

Date: 23rd January 2019

Dear CDM Team (UNFCCC Secretariat),

e-mail: CDMRegistration@unfccc.int

Reference: Request for review for request for issuance of the PoA 5342: African Improved Cooking Stoves Programme of Activities – Issuance request

Carbon Check (India) Private Ltd., (CC IPL) acknowledges the issues raised by UNFCCC in reference to the Request for review for request for issuance of the PoA 5342: African Improved Cooking Stoves Programme of Activities – Issuance request 5342-MP5-IRP2.

As part of our response, Monitoring Report, Emission Reduction spreadsheet and the Verification Report have been appropriately revised and are being resubmitted.

Issue raised during Request for Review		
<p>1. As per paragraph 120 (b) the PS-PoA (version 01.0), the eligibility criteria shall cover conditions to avoid double counting, such as unique identifications of product and end-user locations. Page 23 of the PoA-DD also requires recording of name/identification of end user. However, as per the CAR ID 02, the stove database (i.e. worksheet "CPA Distribution data" in file "CDM PoA 5342 MP#5 Ghana ER calculator ver 2.0 31072018") does not list the actual end users. The database shall contain identification of end-user otherwise it would not be possible to, inter alia:</p> <ul style="list-style-type: none">(i) identify the source of the emission reduction as it is not clear whether the stoves remain under the CPA or PoA boundary;(ii) check whether a particular household has more than one cook stoves, as the baseline stove fuel consumption was ex-ante fixed based on household fuel consumption and assuming that there is only one stove in each household; and(iii) draw proper samples since the location of the stove (at end user) remains unclear. <p>With the above observation, the DOE is requested to explain how it has verified:</p>		
Issue raised during Request for Review	CME Response	DOE Assessment
(a) The implementation of the PoA, in particular whether the management system is in line with the revised and approved PoA-DD in regard to the correctness of the database as it is not recording name/identification of end user.	<p>a) The CME wishes to clarify that it has implemented the PoA as per the PoA Operational and management plan specified in the PoA-DD (page 23 onwards).</p> <p>A CPA distribution record, is generated only when a physical ICS sale takes place, and gets listed in the CPA distribution database. For the instances referred by UNFCCC in the review finding (multiple ICS</p>	The verification team confirms the implementation of the PoA, in line with the management system stated in the approved revised PoA-DD. This is based on the fact, that the cases for which multiple stoves were sold to one owner (with actual

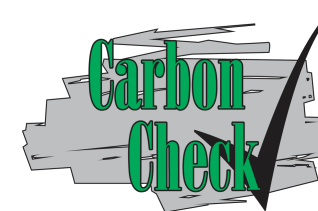
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	<p>listed with the same name and address in the database), the ICS sales have been made to owners / buyers of the ICS (for example, local representatives - village head, Donor Organization / sponsored program Institution, landlords in case of rented living / slum developments, association / group representative, relatives etc. as referred in response to CAR 05 of the verification report) who subsequently distributed the ICS to the intended actual end user.</p> <p>For all cases (including multiples ICS listed on the same name and address in the database), each ICS unit can be uniquely tracked in the field through the ICS's unique serial number (product identification punched on the ICS) and by contacting the corresponding owner for actual end user detail. The owners/ buyers possess complete information and data of corresponding actual end users. Thus, the CME confirms that it is possible to identify the actual end user location in the field, as required.</p> <p>Therefore, the CPAs under the PoA have been implemented in accordance with the PoA management system as per the revised and approved PoA-DD. CME confirms to further improve the CPA distribution database to also record end user information for all ICS instead of owner / buyer (resulting in multiples ICS listed with the same name and address in the database), which shall be verified during next periodic verification.</p> <p>Additionally, please note that for this monitoring period, the CME has only claimed CERs for ICS for which the end user details are available, as discussed in b) below. Refer the revised MR and ER calculator.</p>	<p>end user data not recorded in the presented data base), it is possible to uniquely identify and locate the end user in the field through the unique serial number punched on each stove and through contacting the corresponding stove owner listed in database. This was further confirmed by the verification team during the on-site visit interviews with the CPA implementers and sample stove owners (with multiple stoves listed in the database).</p> <p>Moreover, as a conservative measure for this monitoring period, CME is now claiming emission reductions for only those stoves for which actual end user data is present in the CPA database. The CME has discounted CERs for all cases with multiple stoves listed on same name and address in database. The verification team has checked the revised ER calculator and confirms that such cases has been aptly discounted from ER calculations. Revised MR, ER spread sheet and Verification Report being submitted in this respect.</p> <p>Furthermore, a FAR is being raised</p>
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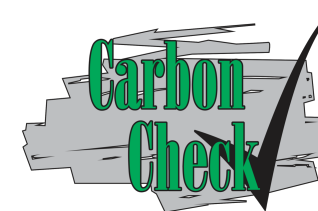
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		in this respect, for the CME, to present the data base including all the end users in the next verification (Please refer to the revised Verification Report).
<p>(b) The emission reduction calculation, in particular the number of stoves claiming emission reductions since:</p> <p>(i) the database does not record the information of the end user, which raises concerns on whether all stoves claiming emission reductions have been distributed to end users under the CPA or PoA boundary;</p> <p>and</p> <p>(ii) the 105 samples selected by the CME show one ICS per customer while the stove database shows that some customers listed with more than one ICS. Therefore, the multi-use scenario observed (e.g. ten stoves used by customer name "PATRICK BANOYELE") in the population (i.e. 15,241 ICS) was not reflected in the samples and eventually no discount was applied to ensure that only one ICS per household is credited as described in ex-ante baseline parameter $Q_{biomass}$ (i.e. annual average biomass consumption per appliance)/the monitoring plan for parameter N_{all} and the CAR ID 02 in the verification report.</p>	<p>b) Envirofit manages ICS distribution in Ghana via CPA Implementors (CEEDS and Envirofit itself). The CPA Implementer is mandated to distribute ICS in Ghana only (i.e. the CPA boundary) thus ensuring that any ICS sold under the CPAs remains within the CPA boundary. Although some of the CPA distribution records do not mention the actual end user name, the ICS sale within the CPA boundary is still confirmed as the buyer / owner address is also within the CPA boundary.</p> <p>The CME wishes to clarify that out of total 105 random samples monitored, 24 samples have more than 1 ICS listed on the same name and address. Thus, the sampling covers cases with more than one ICS listed on a given name and address. In none of these monitored samples, more than 1 ICS was found during the monitoring surveys conducted by the PP confirming use of only 1 ICS per household. Hence, no discount factor to adjust N_{all} was applied in previous submission.</p> <p>Further, as an added conservative measure, the PP has decided to further discount (from ER calculations) all multiple ICS listed on a given name and address from the CPA distribution database. Please refer the CPA distribution data (Column E "Multiple ICS Check") of the revised ER calculator. For all multiple ICS cases, as perceived, the stove_{year} fraction has been considered as zero ensuring that no CERs are accounted.</p> <p>This ensures that the CERs are being claimed,</p> <ul style="list-style-type: none"> • Only for ICS with end user details in the CPA distribution data, and; 	<p>The verification team confirms that the stoves are distributed within the boundary of the CPAs. This was confirmed by the verification team during the on-site visit interviews with the CPA implementers and also the stove users/ owners who confirmed having distributed the stoves within the country.</p> <p>Further, the multi-use scenario, is not deemed present in CPA households under verification. From 105 randomly sampled ICS monitored (out of total population of 15,241), 24 samples were found to have more than 1 ICS listed on the given name and address in the database.</p> <p>Presence of only 1 stove in these household was further cross-verified during the onsite visit by the verification team. As part of acceptance sampling, the verification team picked random samples from the CME's 105 samples which included two</p>

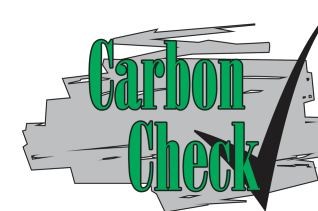
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	<ul style="list-style-type: none"> • Only one ICS unit per household <p>As a result, there is a significant reduction in the ERs. The ERs have reduced to 27,082 from 31,319 (~13.5% reduction) due to discarding 4,224 ICS out of total 15,241 (~27.7% reduction) ICS in the CPA distribution database. The reduction in ERs is relatively lower compared to reduction in ICS as for CPA 5342-0001 because the ERs in CPA 0001 are already capped at ex-ante value of 15,477 (corresponding to micro-scale threshold – 60GWhth, as per CPA-DD). If the capping is not considered, then the CERs have actually been reduced by ~27.7%.</p>	<p>samples from the above 24 samples (David Yaw Yeboah and Abigail Ameyaw). The verification team confirmed these samples to be using only one ICS each in their household.</p> <p>However, in order to further ensure that emission reductions are claimed</p> <ul style="list-style-type: none"> • Only for ICS with end user details in the CPA distribution data, and; • Only one ICS unit per household <p>the CME is now claiming emission reductions for only those stoves for which actual end user data has been presented in the CPA database.</p> <p>Therefore, the CME has discounted CERs for all cases with multiple stoves listed on same name and address in the database, as a conservative measure. The verification team has checked the revised ER calculator and confirms that such cases has been aptly discounted from ER calculations. Revised MR, ER spread sheet and Verification Report being submitted in this respect.</p>
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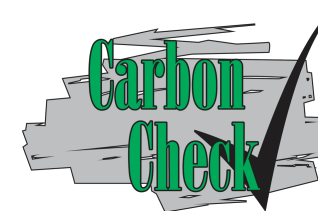
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<p>(c) The sampling conducted by the CME, with regard to whether the selected samples were representative of the population, as it is not clear how the samples were drawn (i.e. whether from the "CPA Distribution Data" which does not list actual end users, or from other data).</p> <p>Please refer to paragraphs 340 and 358 (a) of VVS-PoA (version 01.0), paragraph 24 (b) of Standard for Sampling and surveys (version 07.0)".</p>	<p>c) As explained in the response a) above, CME can trace the end user in the field, as required, for each ICS listed in the database (including those enlisted under same name and address in the database), through the ICS's unique serial number and by contacting the corresponding owner.</p> <p>The CME wishes to clarify that samples were drawn from the entire population under the CPAs (15,241 ICS) for monitoring purposes. 130 random numbers were generated online, selecting a range of 1 to 15241, giving each ICS in the population, an equal chance of being selected. This is also substantiated by the fact that the 105 samples monitored, also include 24 samples having more than one ICS listed on their given name and address in the CPA database.</p> <p>Since the random samples generated for the monitoring survey were selected from the entire population of ICS under the CPAs, the selected samples are representative of the population.</p>	<p>It is confirmed by the verification team that the CME had selected the samples from the whole population of the ICS distributed, i.e. 15,241. The Verification team had verified the evidence for the random generator in this respect covering the entire population of 15,241 which has also been listed in the verification report Appendix 3 /14/.</p> <p>The random numbers were generated online via Stat Trek random number generator on 2 February 2018 which is before the date of start of monitoring by CME.</p> <p>Further the range of random numbers specified, in the evidence provided (minimum value of 1 and maximum value of 15241) confirms the consideration of entire population for sampling. Out of 130 random numbers generated, the least value was verified to be 4 and highest value was verified to be 15,159 thus confirming the random numbers to be scattered over entire population.</p> <p>Further the 105 samples monitored, include 24 samples with more than 1 ICS on the same name and</p>
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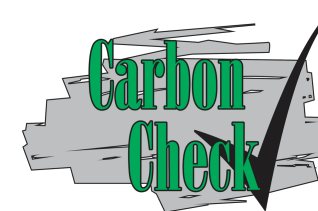
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		address in the CME's sample list confirming that multi-stove scenario was covered under sampling. Hence the verification team concludes, the sampling approach adopted by CME to be appropriate and the identified samples as representative of the whole population (15,241 stoves).
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We believe that the above response and revised documents adequately address the issues raised during the Request for Review.

In case of any further query, the undersigned shall be responsible for answering and can be reached via the contact details provided below.

Kind regards

(Amit Anand)
Chief Executive Officer

Reference documents attached:

1. Revised MR in Track Change (CDM PoA 5342 MP#5 Ghana MR ver 3.0 22012019 track)
2. Revised MR in Clean (CDM PoA 5342 MP#5 Ghana MR ver 3.0 22012019 clean)
3. Revised ER Sheet (CDM PoA 5342 MP#5 Ghana ER calculator ver 3.0 22012019 final)
4. Revised FVR in Track Change (CC IPL 608_FVR_Review response_track change)
5. Revised FVR in Clean (CC IPL 608_FVR_Review response_clean)

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