

Dear CDM Team (UNFCCC Secretariat),

Date: 25/01/2019

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

Envirofit International Ltd., 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-IRP1. As part of our following response, revised Monitoring Report and Emission Reduction spreadsheet 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. The approved revised PoA-DD, page 23, also requires the recording of name/identification of end user. However, as per the CAR ID 11, the database which is described in the file "5342 MP5 B1 ER sheet" (in worksheet "CPA Distribution data") does not list the actual end users. Without the database containing identification of end-user, it would not be possible to, inter alia:</p> <ul style="list-style-type: none">(i) Identify 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 fuel consumption which is fixed ex-ante is determined for each household assuming that there is one stove in the 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
<p>a) The implementation of the PoA, in particular the management system, in line with the revised and approved PoA-DD in regard to the database not recording name/identification of end user and correctness of the database. It is noted that the CME's sampling revealed that five sampled households own another ICS. However, it is observed that according to the worksheet "CPA Distribution data", the other ICS found in three of these five sampled households are under different customer. As an example, in sampled household with ICS serial number EC1J036202 (under customer name MURUF SITU in city KADUNA), the other ICS found in the household has serial number of EC1J037096. However, according to the worksheet "CPA Distribution data", ICS with serial number EC1J037096 is registered under customer name BABATUNDE AROWOLO in city LAGOS.</p>	<p>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 21 onwards).</p> <p>The CME collects end user information for ICS distributed via local distribution partners at the time of sale (CPA distribution record). A CPA distribution record, is generated only when a physical ICS sale takes place, and gets listed in the CPA distribution database.</p> <p>However, in some cases, 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 11 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 information and data of corresponding actual end users. Thus, the CME confirms that it is possible to identify the actual end user address 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>Besides, the CME has additionally provisioned for confirming correctness of distribution data at the time of ex-post monitoring via random sampling. For each monitoring survey conducted, it is confirmed that the serial number of the ICS and the ICS model matches exactly with that mentioned in the database. Please refer column 'N' in Monitoring survey Summary where serial number of ICS in database is matched with ICS observed in the field to ensure that the correct sample is being monitored.</p> <p>Similarly, presence of multiple ICS in a household (refer column 'R' and 'S' in Monitoring Survey Summary) is also confirmed ex-post <u>to ensure only one ICS is credited per household</u>. At the time of monitoring, the presence of any additional ICS is recorded along with the reason for using multiple ICS.</p>

Issue raised during Request for Review	CME Response				
	<p>The entire population is proportionally adjusted (based on % samples with multiple ICS), for the purpose of ER calculations, accordingly. This approach cross-checks the following:</p> <p>1. <u>Usage of multiple ICS listed at the same name and address in the database, in the same household</u> - Out of total 135 samples randomly monitored from database, 18 samples are having than 1 ICS are listed on the given name and address as follows:</p>				
	SERIAL NUMBER	ICS Model	CUSTOMER NAME	CUSTOMER ADDRESS	ICS Listed in database
	EC1J038224	CH2300	ABUBAKAR ABDULAH	NATIONAL BOARD TECHNICAL EDUCATION	9
	EM1G011943	M5000	ABUBAKAR MARSIR	SAHADA N.N.D.C	2
	EC1J058755	CH2300	ALH AJARA SANUSI	BABOKO COMMUNITY	3
	EM1G011762	M5000	AMHAD GARBA	72,GADAN-KAYA	5
	EM1G011986	M5000	BALIKISU	KANO	2
	EM1G011915	M5000	FATIMA TIJANI USMAN	1,KARAYE	2
	EC1H094240	CH2300	JULIANA OPEIFA	SACRED HEART HOSIPITAL,LANTORO,ABE OKUTA	2
	EC1J036446	CH2300	KEMI KALEB	28, JUNCTION RD	2
	EC1H094802	CH2300	MRS AJAYI	SACRED HEART HOSIPITAL,LANTORO	3
	EM1G011839	M5000	MRS FELICIA OGENYI	10,MOUNT STR,ACHARA LAYOUT	2
	EM1G057565	M5000	MRS KEHINDE MOJISOLA	MILE 2,AIYETORO RD,LAFENWA OLORUNSOGO	2
	EM1G057466	M5000	MRS. ESE IGHODAKPOR	BENIN CITY	2
	EC1H091546	CH2300	MRS. IRENE MARY OGIERIAKHI	BENIN CITY	3
	EM1G012288	M5000	NGAH BENEDETH	ONUNWANKWO 1,UMUHUALI NKALAGU	2
	EM1G012155	M5000	OGBODO CHRISTIANA	79,OGBAGA RD	2
	EM1G059544	M5000	OSARENMINDA DORIS MRS.	BENIN CITY	2
	EC1J037725	CH2300	SHOLANKE FOLASHADE	19 MUSA OYINKANSOLA AV ABEOKUTA	2
	EM1G056982	M5000	Hussaina Makun	Zaria	2

Issue raised during Request for Review	CME Response					
	<p>However, only 1 out the 18 samples only Hussaina Makun with ICS serial numbers (EM1G056982 and EB1A028043) was found using more than one ICS. The ICS population has already been discounted accordingly considering this one sample with two ICS in the same household.</p> <p>2. <u>For the rare cases, where a household / end user may have another ICS not reflected on his/her name and address in the database</u> – The ex-post monitoring has been provisioned to capture such cases and discount parameter value for N_{all} accordingly. Out of total 135 samples randomly monitored from database, 5 such samples were found using more than 1 ICS during the monitoring survey visits. For Hussaina Makun (EM1G05698 and EB1A028043) both ICSs are traceable in the database on her name. For Malam Munrai (EM1G057941 and EB1A024564) the second ICS is not listed in the database, which is conservative. For Bernice Alhassan (EB1A027867 and EB1A027644) both ICS in the database are listed at the same address, and are being used in a hospital, catering to a much larger population relative to baseline established in the CPA-DD). For remaining 2 samples, the second ICS is listed in the database on a different name and address.</p>					
	Sl. No.	ICS serial number	User name and address	Additional ICS serial number	User name and address in database for additional ICS	Comment
	4	EC1J036202	Muruf Shitu Shade, 12, Alibarka Lwa Rd T/Wasa Kd, Kaduna	EC1J037096	Babatunde Arowolo, Iddo Plastic Ijora, Lagos	The user at the time of monitoring survey has confirmed that the other ICS was being used by them in their village earlier (refer column 'W' in the Monitoring Survey Summary) thereby justifying validity of a different end user / address in the database.
	5	EC1J035107	Ajayi Paul, 9 Gora Str U Pama, Kaduna	EC1J035790	Banjo O. Adetutu, 8, Gabon Ave, Barnawa, Kaduna	The ICS are in the same village sold by same local distributing partner within a gap of one day. This further substantiates the validity of cases mentioned against response to CAR 11 where actual end user information is not available.
	<p>Although in the above two cases, the ICS are found listed on different names in Database, nevertheless, the multiple ICS identified (as specified in above 5 cases) during ex-post</p>					

Issue raised during Request for Review	CME Response
	<p>monitoring results in an equivalent adjustment to the ICS population accordingly. A discount of 4.11% (296 ICS out of 7197) for charcoal ICSs and 3.23% (32 ICS out of 993) for woodfuel ICSs had been already applied to the ER calculations based on monitoring results, in previous submission.</p> <p>Lastly, 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 D "Multiple ICS Check", tab "CPA Distribution Data") 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; • Only one ICS unit per household <p>This is additional to the discount which has already been applied based on ex-post monitoring of multiple ICSs in same household, as overly conservative.</p> <p>As a result of this, the ERs have reduced to 11,791 from 21,582 (~45% reduction due to discarding 3,574 ICS from ER calculations out of total 8,190 ICS in the CPA distribution database.) The revised MR and ER calculator are being submitted.</p>
<p>b) The emission reduction calculation, in particular the correct determination of number of stoves as the database does not record the information of the end user, hence raising concern on whether all stoves claimed under the emission reductions have been distributed to end users under the CPA or PoA boundary.</p>	<p>Envirofit manages ICS distribution in Nigeria via CPA Implementors (CEESD and Envirofit itself). The CPA Implementer is mandated to distribute ICS in Nigeria 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>Further, the correction applied in a) above ensures that only ICS with end user details in the database and thus present within the CPA boundary are accounted for CER calculations.</p>
<p>c) The sampling conducted by the CME, with regard to whether the selected samples were</p>	<p>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>

Issue raised during Request for Review	CME Response
<p>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, 358 (a) of VVS-PoA (version 01.0), paragraph 24(b) of Standard for Sampling and surveys for CDM project activities and programmes of activities (version 07.0)".</p>	<p>The CME wishes to clarify that samples were drawn from the entire population under the CPAs for monitoring purposes. Random numbers were generated online covering entire population in each category (fuel type). For woodfuel ICSs, 90 random numbers were generated online selecting a range of 1 to 993 (total number of ICS in CPA 04). For charcoal ICSs, 90 random numbers were generated online selecting a range of 1 to 7197 (total number of ICS in CPA 05). Thus, each ICS in the population was given equal chance of being selected. This is also substantiated by the fact that the 135 samples monitored, also includes 17 samples having than 1 ICS are listed on the corresponding 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>

We believe that the above response and revised documents submitted 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



(Rohit Lohia)
Carbon Project Development Manager
Envirofit International
rohit.lohia@envirofit.org
+91 9717093552

Reference documents attached:

1. Revised MR in Track Change (5342 MP#5 MR Nigeria v4.0 24012019 FINAL track)
2. Revised MR in Clean (5342 MP#5 MR Nigeria v 4.0 24012019 FINAL clean)
3. Revised ER Sheet (5342 MP#5 ER Nigeria v3.0 24012019 FINAL)