



**Approved baseline and monitoring methodology/  
methodological tool clarification response form  
(Version 02.0)**

**INFORMATION TO BE COMPLETED BY THE SECRETARIAT OR PANEL/ WG**

<b>Date and number of Panel/ WG meeting:</b>	5–8 May 2014/SSC WG 44
<b>Title/Subject of the request for clarification:</b>	Clarification on the requirement to avoid double counting under AMS-II.G
<b>Reference number of the request for clarification:</b>	SSC_703
<b>Exact reference (number, title and version) of the methodology or methodological tool to which the request for clarification applies:</b>	AMS-II.G “Energy efficiency measures in thermal applications of non-renewable biomass --- Version 3.0”
<b>Fast track or Regular track:</b>	<input type="checkbox"/> Fast track <input checked="" type="checkbox"/> Regular track

**Summary of the request for clarification**

Original text from PP:

For Programmes of Activity (PoAs) applying the methodology: AMS-II.G.: Energy efficiency measures in thermal applications of non-renewable biomass --- Version 3.0, there is a requirement that the applied measures are uniquely identified so as to avoid double counting. This requirement is governed by the CDM Standard: Demonstration of additionality, development of eligibility criteria and application of multiple methodologies for programmes of activities (CDM-EB65-A03-STAN), paragraph 16 b):

*Conditions that avoid double counting of emission reductions like unique identifications of product and end-user locations (e.g. programme logo);*

During the application of the methodology for the registered PoA 5342: “African Improved Cooking Stoves Programme of Activities”, the PP, Envirofit International, interpreted the Paragraph 16b literally and incorporated the following provision to avoid double counting into Eligibility Criteria no. 2 of the registered PoA-DD:

*[Part 1]*

*Photo or similar proof that stoves have a unique serial ID number or other means of identification.*

*[Part 2]*

*For first CPA, document to be provided: stove sales receipt (“CPA Distribution Record”) showing CME and DO logos, end user details including name and address and stove ID number.*

*[Part 3]*

*For all subsequent CPAs, in addition to the sales receipt the programme logo shall be displayed on the stoves.*

Envirofit has applied Part 1 and Part 2 of the eligibility criteria for the first CPA by effectively establishing a system of unique identification of each stove Envirofit manufactures, based on serial numbers. This is an approved way of avoiding double-counting of appliances in CDM projects registered using the AMS-II.G methodology, alongside the capture of unique customer data from each stove distributed. Many registered PoAs applying the methodology utilize this system.

Envirofit is facing significant difficulties in applying Part 3 of the eligibility criteria for all subsequent CPAs (programme logo). Envirofit manufactures stoves in a centralized manufacturing unit, making it difficult to identify in advance which stoves will be sold to a specific project developer (whether that be Envirofit itself or another PP). Envirofit has experimented with stamping each stove with a suitable heat-proof stamp containing the programme logo that will be visible over the stove’s lifetime. However, after a short period of use, stoves become blackened very quickly, making the programme logo illegible, and over time the heat from the stove is causing the ink to run and smudge. We feel that it will be almost impossible for a DOE to

check these stamps for the programme logo accurately during verification.

Quite apart from the logistical difficulties this represents for Envirofit as a stove manufacturer, it is furthermore not something project developers or other registered PoAs applying the approved methodology are implementing.

So Envirofit would like to propose an alternative workable solution.

As mentioned above, Envirofit uses a unique system of serial numbers to identify every stove it manufactures and distributes under the PoA 5342. We will supply (e.g. via physical database copy or a password protected section of Envirofit's website) to the DOE a master set of serial numbers of all Envirofit stoves distributed by country, so that a validating/verifying DOE can check for the uniqueness of the stoves distributed under the PoA in any country. This will enable a validating/verifying DOE to check the avoidance of double-counting and ensure that stoves can be identified as belonging to PoA 5342 and not to a PoA managed by any other CME.

Therefore, a validating/verifying DOE can review the country master list of stove serial numbers against the unique serial numbers of stoves distributed in the project, plus the unique customer data Envirofit captures at the point of sale contained in the Envirofit monitoring database.

With this background, Envirofit requests a clarification from the Secretariat with regards to the ongoing requirement of meeting Part 3 of the eligibility criteria no.2 in the registered PoA 5342 noted above for subsequent CPAs. With the existing system adequately avoiding double counting of stoves, plus the provision of the master list of Envirofit stove serial numbers to verifying DOEs, the need for the programme logo visible on every can be averted. We therefore request the Secretariat to clarify whether this proposed alternative solution is acceptable or not.

It is also noted that Envirofit does recognize that there is a risk of double-counting between multiple stove projects implemented in a specific country where Envirofit is the manufacturer, but not the developer or CME.

We therefore can supply, on request, (e.g. via physical database copy or a password protected section of Envirofit's website) to any DOE a master set of serial numbers of all Envirofit stoves distributed under other PoAs by country, so that any DOE can check for the uniqueness of the stoves distributed under any stove project in any country.

#### Clarification by Panel/ WG

The Small-Scale Working Group (SSC WG) of the Executive Board (hereinafter referred to as the Board) of the clean development mechanism (CDM) would like to thank the author for the submission.

The requirements indicated in the methodology AMS-II.G and the PoA standard you have cited are to ensure that if monitoring is based on sample survey, sample selection is on a random basis to ensure results are unbiased estimates of the parameters and each unit (e.g. each cookstove if only one stove is distributed per household) would have equal chance to qualify as a sample. Besides the requirements are also to avoid double counting within the PoA (the same device belonging to two different CPAs of the same PoA); and to avoid double counting in situations external to the PoA (the same device belonging to two different PoAs). Thus unique identification of each stove would avoid double counting as well as allow implementation of unbiased and reliable sample schemes.

The SSC WG noted that the eligibility criteria in the registered PoA-DD included the provision stating that "The CPA includes a means of uniquely identifying the stoves to be distributed and the end-users who will receive stove. This shall ensure no double counting of stoves within the PoA and ensure that stoves can be identified as belonging to this PoA and not to a PoA managed by any other CME". Further the SSC WG noted that three means i.e. part 1, part 2 and part 3 have been proposed to check compliance with the eligibility criteria.

The SSC WG is of the opinion that, in principle, part 1 and part 2 of the eligibility criteria no.2 you have cited above meets the requirements for unbiased sampling and avoiding double counting of functional stoves. The SSC WG understood that the stoves will have a unique serial ID number from manufacturer as well as a CME ID number. In cases where this is not possible, other means such as providing an ID card/name plate to the final user of the stove with this information will be undertaken. The SSC WG also noted that actual implementation of these aspects (e.g. checking the serial numbers of stoves provided versus those listed in the master list on the website) is an aspect to be checked by a DOE during validation.

As stated in paragraph 187 of the CDM Validation and Verification Standard, "the DOE shall assess any proposed CPA that a coordinating/managing entity wishes to include in the PoA, to determine whether it

complies with the eligibility criteria specified in the CDM-PoA-DD". The same paragraph also states that "the means of validation to determine compliance with this requirement will be specific to the PoA". Therefore, the SSC WG is of the opinion that it is the responsibility of a validating DOE to determine compliance with the eligibility criteria for CPAs, and that the means for the DOE to assess compliance with the eligibility criteria may include those already described in the registered PoA-DD as well as other means which the DOE find it appropriate, taking into account specificity of the proposed PoA.

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### Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
02.0	18 July 2013	Revised to remove the row "Date and signature of the chair and vice chair of Panel/WG (in case of clarification by Panel/WG)"
01.0	4 July 2013	Initial publication. This document supersedes and replaces the following documents: <ul style="list-style-type: none"> <li>• Recommendation Form for Small Scale Methodologies (F-CDM-SSCwg) (Version 01.1)</li> <li>• Recommendation Form for Small Scale A/R Methodologies and Procedures (F-CDM-SSC-AR) (Version 01.1)</li> </ul>
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