



CDM: Recommendation Form for Small Scale Methodologies (version 01)

(To be used for presenting questions/proposals/amendments to the simplified methodologies for small-scale CDM project activity categories)

<i>Date of SSC WG meeting:</i>	27–30 October 2009, SSC WG 23
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Clarification regarding the term “independently tested” with regard to derivation of mortality curve for project CFLs
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS-II.J, version 3
<i>Name of the authors of the query:</i>	Seleha Lockwood Institution: Sindicatum Carbon Capital Seleha.lockwood@carbon-capital.com

Summary of the query:

Please use the space below to summarize the query related to SSC methodologies/categories SSC Modalities and Procedures provide recommendation/analysis of the SSC WG.

Original text from PP:

Fast track clarification is sought on the term “independently tested”.

In AMS-II.J. Version 3:-

As per paragraph 5:-

“High quality lamps that have been independently tested must be used. To ensure this a relevant national or international testing standard shall be followed to determine the rated lifetime of the lighting equipment; the project design document shall cite the standard [footnote 2] used to determine the rated lifetime of efficient lamps distributed under the project activity.”

As per footnote 2:-

“National standards or in the absence of national standards, international standards (e.g., IEC 60969) may be used.”

As per the end of paragraph 15:-

“However, under no circumstances can a estimate of LFR_{i,y} value be lower than that indicated in the mortality curve of the CFL determined as per the independent tests referenced in paragraph 5 of this methodology.”

In summary, PPs are asked in paragraph 5, footnote 2 and at the end of paragraph 15 to conduct independent tests on bulbs used in the CDM project activity (paragraph 5) and to use standards such as IEC 60969 (footnote 2) in this testing and to determine a mortality curve from such testing (paragraph 15).

First, we understand the importance of ensuring “High quality lamps” in paragraph 5 but we seek clarification on what “independently tested” means subsequent to that. In our request for clarification we suggest that “independently tested” indicates that there be independent testing by a third party and/or the use of certified laboratories under the standard IEC17025 using the method provided under IEC60690 or a national standard to determine rated lifetime without having a full lifetime test.

Second, we seek clarification on a fundamental point. Using standards such as IEC 60969 do not involve specification of how a mortality curve would be derived. In fact IEC 60969 was never intended to be to derive a curve and, in any case, this standard specifies the use of twenty lamps only for testing, which is insufficient to determine a statistically representative curve. As a result, different PPs could determine whichever curve they like. We would, therefore, like to clarify whether the linear failure rate can be used without taking into account a curve whose derivation could be open to wide disparity.

Recommendation by the SSC WG:

Please use the space below to provide amendments/change (in your expert view, if necessary).

Please refer to paragraph 14 of the meeting report of the SSC WG 23 (http://cdm.unfccc.int/Panels/ssc_wg).

Answer to authors of query by the SSC WG:

Please use the space below to provide answer to the authors of the above query.

The small-scale working group of the CDM Executive Board would like to thank the author for the submission.

The SSC WG defines ‘independently tested’ in the following manner:

“Independently tested means activities that result in documented results based on tests conducted by third-party laboratories, certified under standard ISO/IEC 17025, using national standards, or in the absence of national standards, international standards, to determine (a) rated lifetime (e.g., using IEC 60969) of the lighting equipment and if desired (b) lamp mortality curves if a national or international standard exists to determine such mortality curves.”

Per Note 2 of ISO/IEC 17025, “If the laboratory wishes to be recognized as a third-party laboratory, it should be able to demonstrate that it is impartial and that it and its personnel are free from any undue commercial, financial and other pressures which might influence their technical judgment. The third-party testing or calibration laboratory should not engage in any activities that may endanger the trust in its independence of judgment and integrity in relation to its testing or calibration activities.”

With respect to referencing standards other than IEC 60969 for mortality curves or modifying the language of paragraph 15, the SSC WG has not found any available standards and thus clarifies that the straight line mortality curve should be used as indicated in II.J to determine lamp failure rate (LFR). If, per paragraph 15, an *ex post* adjustment that reduces the LFR is indicated, based on documented monitoring results, then the reduction in LFR adjustment can only be made if (i) a mortality curve developed in accordance with a national or international standard is available and (ii) the LFR adjustment is equal to or more conservative than the available mortality curve. If such a standard does not exist then the *ex post* data cannot be used to reduce LFR. Thus, the monitoring results, in the absence of the mortality curve developed in accordance with a national or international standard, shall only be used to confirm the *ex ante* LFR or increase the *ex ante* LFR.



Signature of SSC WG Chair

(Hugh Sealy)

Date: 30/10/2009



Signature of SSC WG Vice-Chair

(Peer Stiansen)

Date: 30/10/2009

Information to be completed by the secretariat

SSC-Submission number	SSC_354
Date when the form was received at UNFCCC secretariat	30 October 2009
Date of transmission to the EB	30 October 2009
Date of posting in the UNFCCC CDM web site	30 October 2009