



**GLOBAL STAKEHOLDER CONSULTATION FORM FOR  
PROPOSED NEW BASELINE AND MONITORING  
METHODOLOGY OR METHODOLOGICAL TOOL  
(version 01.0)**

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<i>Reference number of proposed new methodology or methodological tool</i>	A6.4-PNM004
<p><i>Based on an assessment of information in the A6.4-FORM-METH-002 and its application in sections A to C of the submitted draft project design document (A6.4-FORM-AC-020), provide your comments to the proposed new methodology using the tabular format below. Please indicate the sections or issues to which your comments refer to.</i></p>	
<i>Date received by the secretariat</i>	03 July 2025

#	Section / Para no./ Annex / Figure / Table	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)
1	Section 12.3 / Para No. 1009	General	<p>“KPTs must be conducted every two years, at the end of the monitoring period for which credits are being validated and issued, rather than at the beginning of the monitoring period.”</p> <p>This paragraph is unclear about whether surveys can be done near the end of the monitoring period or only after it ends</p>	Please clarify this point. Furthermore, if surveys can only be conducted after the monitoring period ends, it raises a commercial concern, as it would delay credit issuance by approximately two to three months.

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2	Appendix 6	General	<p>“All surveys undertaken for CLEAR must be conducted by trained enumerators. Best practice is for these enumerators to be independent of the project proponent’s organization. At a minimum, enumerators must not be engaged in a customer facing role for the project proponent or its implementation partners, such as selling, marketing, distributing, or providing customer service for project technologies.”</p> <p>The current requirement under CLEAR — that all surveys must be conducted by enumerators independent of the project proponent’s organization and not engaged in any customer-facing roles — presents significant practical and commercial challenges. Specifically:</p> <ul style="list-style-type: none"> <li>Increased cost burden: Hiring third-party enumerators involves substantial additional costs for recruitment, training, oversight, and logistics. This is especially burdensome for projects operating in rural or dispersed geographies where external agencies may not have a presence, leading to further cost escalation.</li> <li>Reduced local participation and trust: In many communities, respondents are more comfortable interacting with familiar local staff. Bringing in unfamiliar third-party enumerators can result in lower participation rates, reluctance to share accurate information, or even refusal to engage, thereby undermining the quality and representativeness of the data collected.</li> <li>CLEAR already includes a 25% discount for Hawthorn effect (row 363-367), potentially already accounting for and mitigating these concerns.</li> </ul>	<p>Given these concerns, it is proposed that the methodology be updated to allow project proponents to conduct surveys using their own trained teams, provided that additional safeguards are put in place to minimize bias. For example:</p> <ul style="list-style-type: none"> <li>Segregation of duties: Enumerators from the project proponent’s team conducting surveys should not be the same personnel involved in sales, marketing, distribution, or direct customer service.</li> <li>Enhanced documentation: Detailed records (including enumerator logs, GPS-tagged survey records, and random back-checks) can be maintained to demonstrate impartiality and robustness of the process.</li> </ul> <p>This balanced approach would help ensure high-quality, unbiased data while maintaining community trust and keeping costs manageable, thereby supporting the long-term sustainability and scalability of such projects.</p>
3	Section 1 Row 164	Technical	<p>Currently states that MP can be no longer than two years.</p> <p>In the case of a CDM project transitioning to Art6.4 there may be an situation where no MP has been able to be stipulated or monitored due to the collapse of the CDM.</p>	<p>Proposed change would allow for projects to request deviation on this metric if there are situations outside of their control (collapse of the CDM) that have prevented the utilisation of a maximum 2 year monitoring period.</p>

(Please add rows as required)

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Document information

Version	Date	Description
01.0	23 May 2025	Initial publication of form template.
Decision Class: Regulatory Document Type: Form Business Function: Methodology Keywords: A6.4 mechanism, developing methodologies and tools, stakeholder consultation		