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Document reference number and title: (Recommendation from the MEP to SBM020)**Draft mechanism methodology: Cooking energy transition**

Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	Cover note	-	Anew appreciates the opportunity to provide feedback on the Cooking Energy Transitions Draft Methodology. As a carbon project developer and investor for over 20 years, Anew (and our predecessor companies Bluesource and Element Markets) have developed and/or financed a variety of projects and methodologies and in each, ensuring robust quantification, monitoring, additionality, and risk management were essential. As an investor in cookstove projects, we are highly supportive of and appreciate the MEP prioritizing this project type and working to expeditiously finalize two protocols for adoption by the SBM. However, we are concerned the MEP is moving too fast and not providing sufficient opportunity for consultation. This consultation follows quickly upon the short three-week consultations for rural stove projects (new AMS II.G) and of all the associated tools. All three consultations occurred over the summer holidays, each only three weeks long. This is a very short timeline for all stakeholders to properly engage, especially host countries, whose communities and carbon finance revenue streams will be significantly impacted by the protocols. This very expedited consultation schedule is all the more concerning when considering that this new draft methodology for Cooking Energy Transitions will replace the rigorous CLEAR methodology, which underwent two years of broad sector consultations, while merging the CLEAR methodology with the CDM AMS I.E. We believe there are a number of concerning edits, which the MEP needs to revisit and reconsider. Our high level comments are elaborated below. However, we also note that we support the comments developed and submitted by IETA, as well as the highly detailed and technical comments submitted by cookstove experts and project developers BURN and DelAgua.	-

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2	Cover note	-	1. Permanence is not relevant to cookstoves. Credits from a cookstove project are not at risk of reversal. A cookstove reduces the withdrawal rate from pre-existing stock. There is no mechanism by which the activity releases previously credited carbon. The fraction of non-renewable biomass is fixed ex ante under the applicable tool at the start of the crediting period, as paragraph 41 provides. Credits are therefore issued only in respect of the non-renewable share of the biomass displaced. Any subsequent loss of carbon stocks in the reservoir, from natural or human-induced pressure unrelated to the activity, would by definition increase the non-renewable fraction in that landscape. Because the activity continues to apply the lower, ex-ante value, its credited emission reductions become more conservative at the moment such a loss occurs. The methodology's own analysis establishes that a buffer pool contribution is not justified for activities that reduce the consumption of non-renewable biomass. It is also worth noting, that historically, methodologies for clean cooking under the CDM (including AMS I.E and AMS-II.G), Verra/VCS, and Gold Standard have never required a buffer pool, reversal-risk rating, or permanence liability. No buffer pool deduction should apply to this methodology. (Section 10.2, paras 183-184)	-

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3	Cover note	-	2. The proposed 4.5% common practice eligibility threshold in this methodology is unworkable, inappropriate, and impractical. SDG7 targets 100% access to clean cooking. Excluding areas with more than 4.5% access to clean cooking will exclude many areas that would otherwise be considered additional and which truly need access to clean cookstoves. Arbitrary and overly stringent additionality and common practice criteria will kill projects, making it harder for PACM to channel financing to deserving emission reduction projects, which in this case also help make SDG 7 achievable. If the methodology includes a cap, we believe that the 25-30% proposed by CLEAR and Gold Standard is far preferable and more appropriate than the 4.5% suggested threshold proposed here. (Section 6.2, para 37(f); Section 6.3.3, para 72)	-
4	6. Demonstration of additionality	Para 37(f)	The proposed 4.5% common practice eligibility threshold in this methodology is unworkable, inappropriate, and impractical. SDG7 targets 100% access to clean cooking. Excluding areas with more than 4.5% access to clean cooking will exclude many areas that would otherwise be considered additional and which truly need access to clean cookstoves. Arbitrary and overly stringent additionality and common practice criteria will kill projects, making it harder for PACM to channel financing to deserving emission reduction projects, which in this case also help make SDG 7 achievable. If the methodology must include a cap, we believe that the 25-30% proposed by CLEAR and Gold Standard is far preferable and more appropriate than the 4.5% suggested threshold proposed here.	-

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5	6. Demonstration of additionality	Paras 69-72	The proposed 4.5% common practice eligibility threshold in this methodology is unworkable, inappropriate, and impractical, and does not support the SDG7 target of 100% access to clean cooking. It is also not entirely clear how robust evidence of stove use or efficiency could be gathered so as to compare households. Alternatively, if project developers were to rely on national statistics, many neighborhoods in need of stoves would be excluded. If the methodology must include a cap, we believe that the 25-30% proposed by CLEAR and Gold Standard is far preferable and more appropriate than the 4.5% suggested threshold proposed here.	-

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6	10. Non-permanence provisions	Paras 183-184	Permanence is not relevant to cookstoves. Credits from a cookstove project are not at risk of reversal. A cookstove reduces the withdrawal rate from pre-existing stock. The fraction of non-renewable biomass is fixed ex ante under the applicable tool at the start of the crediting period, as paragraph 41 provides. Credits are therefore issued only in respect of the non-renewable share of the biomass displaced. Any subsequent loss of carbon stocks in the reservoir, from natural or human-induced pressure unrelated to the activity, would by definition increase the non-renewable fraction in that landscape. Because the activity continues to apply the lower, ex-ante value, its credited emission reductions become more conservative at the moment such a loss occurs. There is no mechanism by which the activity releases previously credited carbon. The methodology's own analysis establishes that a buffer pool contribution is not justified for activities that reduce the consumption of non-renewable biomass. It is also worth noting, that and historically, methodologies for clean cooking under the CDM (including AMS I.E and AMS-II.G), Verra/VCS, and Gold Standard have never required a buffer pool, reversal-risk rating, or permanence liability. No buffer pool deduction should apply to this methodology.	Delete all of section 10.2 (para 183 and 184). No buffer pool deduction should be applied.