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1	Cover note	General	"General BURN Manufacturing welcomes the development of a PACM methodology for cooking energy transitions, and submits these comments in a constructive spirit. Our objective, shared with the MEP and the Supervisory Body, is the most accurate, conservative and implementable final methodology. Our input draws on our operational experience manufacturing and distributing cooking devices across African markets. One general observation first. Having worked extensively with the CLEAR methodology (PMM004) on which this draft is built, we found it simple, coherent and closely adapted to the reality of cookstove activities. We were not able to identify clearly the advantage that merging it with elements of AMS-I.E brings. Several of the concerns we raise below - changed terminology, added applicability restrictions, additional conditions - arise from that merger rather than from the CLEAR architecture itself. We would therefore encourage the MEP to keep the final methodology as close as possible to the CLEAR architecture, departing from it only where a clear improvement is demonstrated. Within the new draft, we particularly appreciate the following elements: (i) applicability to both urban and non-urban areas, and to charcoal cookstoves; (ii) leakage determined at methodology level, with a per-stove embodied-emissions default rather than a blanket percentage deduction; (iii) the conservative BAU scenario deemed equal to the baseline scenario, which removes a redundant calculation layer; (iv) SUMs recognised as the preferred usage-monitoring approach, with an activity-specific Hawthorne adjustment; (v) the exclusion of cookstoves installed under registered carbon activities from the common practice analysis (para 67); we propose that this exclusion be extended to other non-market distribution. and (vi) the conservative missing-data rule (25th percentile). These elements improve consistency with field reality."	Retain these elements in the final version of the methodology.
2	4. Applicability	Para 11(a), p. 22	"Applicability Para 11(a) restricts fuelwood-baseline cookstoves to: (i) non-urban areas; (ii) countries with rural electrification below 50 per cent [and no LPG distribution networks]; and (iii) areas outside the	Delete the country-level conditions in para 11(a)(ii) (rural electrification threshold and LPG-network condition). Replace the exclusion in para 11(a)(iii) with a provision allowing activities that also meet the applicability of A6.4-AMM-

			applicability of the companion methodology 'Energy efficiency measures in household cooking' (A6.4-AMM-00X). The companion methodology is itself restricted to rural, low-income contexts. Combined, the two documents leave an eligibility gap. An efficient wood-stove activity in an urban or peri-urban area, or in a country whose rural electrification exceeds 50 per cent (Kenya, for example), would be eligible under neither methodology. This would be the case even where the pre-activity survey demonstrates that households cook predominantly with fuelwood. This matters because national electrification rates are a poor proxy for how families cook, and do not consider wide regional inequalities across nations. A grid connection does not translate into electric cooking - in some countries it doesn't even mean a household has an electricity connection to their house (merely that they are near a pylon). In addition, tariffs, unreliable supply and appliance costs form barriers for rural communities. The MEP's own references document this (ESMAP 2020; MECS 2022). In addition, current and comparable country-level data on rural electrification and on LPG distribution networks may simply not exist for many host countries, which would make the conditions difficult to apply and to verify. Eligibility should therefore follow the demonstrated cooking practice of the target population, not a national infrastructure statistic. On the boundary with A6.4-AMM-00X, we note that the two documents take deliberately different approaches: this methodology prioritises accuracy through direct measurement, while the companion methodology relies on standardised defaults for simplicity. An activity prepared to carry the higher measurement burden should not be barred from it merely because the simpler methodology would also apply. The measurement-based route better reflects the actual conditions of the activity, and accuracy is the objective of the mechanism. The exclusion in para 11(a)(iii) should therefore become a choice."	00X to elect to apply this methodology instead, subject to its full measurement requirements. Allow fuelwood-baseline activities in urban and peri-urban areas where the pre-activity survey demonstrates that fuelwood is the primary cooking fuel. This keeps the two methodologies complementary, with no gap and no overlap.
3	4. Applicability	Para 11(d), pp. 23-24; Question 2, p. 24	"Response to Question 2: We support the inclusion of LPG cookstoves. Beyond mitigation, the transition from solid fuels to LPG delivers major health benefits by reducing household air pollution - a co-	"Retain LPG cookstoves in the final methodology, with the lock-in safeguards of paras 11(d)(iv)-(v) as drafted. Remove the 0.6 tCO2/MWh eligibility trigger in para 11(d)(iii). Alternatively, if a grid-intensity condition is

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			benefit central to SDG 3 and SDG 7 and recognised in the WHO indoor air quality guidelines. A clean cooking methodology should not close the door on a technology that delivers these benefits. We consider the lock-in safeguard conditions reasonable and support their retention, in particular paras 11(d)(iv)-(v) (no new LPG production or import infrastructure; activity participants not involved in LPG production and distribution). One condition, however, would undermine the activities these safeguards make acceptable. The grid-emission-factor trigger of 0.6 tCO2/MWh in para 11(d)(iii) ends eligibility mid-crediting-period once the host grid decarbonises. An activity that was additional and correctly credited at registration would stop being creditable through no change in its own performance. This is a retroactive risk that no investor can price. It would make LPG activities unfinanceable in precisely the countries whose grids are improving. We also note the unresolved [at least one]/[all] drafting in para 11(d), which makes the condition set difficult to assess."	retained, apply it ex ante at registration and reassess it only at crediting-period renewal (consistent with para 27), so that eligibility established at registration is stable for the crediting period. Resolve the [at least one]/[all] drafting in para 11(d). In addition here are few LPG specific safeguards that must be added to avoid any loophole in an Art6.4 activity: 1. Verified fuel-stacking / partial-suite adjustment. Households rarely abandon wood or charcoal fully. Without a measured stacking discount, baseline savings are systematically overstated. Using baseline back calculation with SEC ratio seems the favourable solution here 2. Anti-resale controls on subsidised fuel, cylinder serialisation, refill-frequency caps, ID-linked purchase records, and outlier detection on refill volumes. Where subsidised LPG is cheaper than market, arbitrage leaks fuel out of the project boundary and credits emissions that never happened 3. Individual cross checks of baseline fuels and baseline stoves for 100% of customers as the attractiveness of subsidised fuel in high penetration market can lead to challenging customer targeting. 4. Mandatory updates to baseline scenario within crediting period rather than a fixed 5- year baseline. LPG penetration is extremely volatile and cost sensitive. 5. If a project only relies on sales data records, the project must apply 80% cap on the project fuel consumption. Otherwise, if the project validate project consumption with KPT in the project HH the cap is only 90%. There is no cap for metered devices"

4	6. Demonstration of additionality	Para 37(g), p. 32; para 40(e), p. 33; Questions 3-4, pp. 32-33	"Response to Questions 3 and 4: Price Requirements We respectfully advise against conditioning the simplified additionality route on providing cookstoves [free of charge or] at a fee not exceeding [50 per cent] of production cost, for three reasons. First, additionality derives from the affordability gap and the role of carbon finance in closing it - not from any specific discount against production cost. The study Appendix 10 itself relies on demonstrates this directly. Berkouwer and Dean, now published (Climate Change Economics, 2026), ran a randomised trial with 955 low-income households in Nairobi. An improved charcoal stove was sold at randomised subsidies of 25-98 per cent of its US$40 market price. Households made additional purchases at every positive price level. Only 16 per cent of subsidy expenditure flowed to non-additional buyers. Each additional sale generated 4.6 tCO2e of abatement, at a cost of US$7/tCO2e. Second, the proposed pricing doesn't take into account different financial models for more expensive stove types (which are typically modern fuels). For example, electric, LPG and institutional stoves often include both a carbon subsidy on the upfront purchase price, and some form of PAYGO financing. This PAYGO financing may be funded by carbon, or receivables financing, or both. If a total package of modern stove + fuel is >$150 over the lifetime of a stove, but carbon financing can only sustain a $50 upfront subsidy (based on market conditions and conservative methodologies), then the 50% subsidy level would exclude these modern fuel projects, even if PAYGO financing was used to cover the gap between an upfront payment of $10 and a total cost to consumer of $100. Third, production cost is not observable or verifiable by DOEs. It varies across manufacturers and over time, and a production-cost test rewards inefficient producers: a high-cost manufacturer qualifies where an efficient one does not. Fourth, mandatory below-cost distribution undermines local stove markets and their long-term sustainability. This runs contrary to the Principles for Responsible Carbon Finance in Clean Cooking referenced in Appendix 1. In practice, carbon revenue is	"Delete the price-cap condition in paras 37(g) and 40(e). Replace it with a requirement to document in the PDD how carbon revenue enables the activity: for example, evidence that the end-user price is materially below the prevailing retail price without carbon finance, or that carbon revenue funds consumer financing, distribution or after-sales support. If a quantitative test is retained, benchmark it against the prevailing market retail price rather than production cost, and set it at a level consistent with commercial sustainability. Ensure any price caps include PAYGO financing and other forms of subsidies that make modern stoves and modern fuels accessible"

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			deployed across retail price reduction, consumer financing (PAYGO), last-mile distribution and after-sales service - all of which drive adoption and sustained use."	
5	6. Demonstration of additionality	Para 72, p. 38; Question 5, p. 38	"Response to Question 5: Common Practice Consistent with the position we submitted during the PMM004 consultation, we consider that no fixed penetration rate should act as a binary exclusion. We feel clean cooking programmes would fail if less than 100% of a population is shift away from cooking with e.g. three stone fires and this is a risk with such threshold. Penetration varies by geography and by sub-population: adoption across a city can be high while adoption among the low-income households who most need carbon finance remains far lower. It also moves up and down with market forces. Our preferred approach is therefore a rebuttable threshold: below it the activity passes, and above it the activity may still demonstrate additionality with context-specific evidence, such as adoption within the target population or host-country circumstances. If a fixed value must be retained, it should in any case be no lower than 30 per cent, the level adopted by CLEAR on the same evidence, with carbon-financed devices excluded from the count. It is important to mention the goal of SDG 7 remains one hundred per cent access to clean cooking: a threshold is a screen, not a ceiling."	While common practice analysis can be a useful tool to demonstrate additionality, it should not be used as a mandatory exclusion in this regard. Here we suggest to use the Gold Standard formulation that if there is more than 30% (or higher) penetration we have to prove additionality of the project and not just shut it down.

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6	6. Demonstration of additionality	Para 37(f), p. 32; para 40(d), p. 33; para 72 and Question 5, p. 38	"Demonstration of Additionality - Penetration [1/4] The 4.5 per cent penetration condition should be removed. We refute this condition on three grounds: 1) Counter to the UN Sustainable Development Goals The UN's SDG7 aims for 100% access to clean cooking, not 5% access to clean cooking. Globally, more than 2 billion people lack access to clean cooking. The carbon markets are currently one of the only tools to channel finance for subsidised clean stoves and modern fuels in development contexts. Accepting a 5% penetration as sufficient is inadequate. The threshold is far below the levels adopted elsewhere on the same evidence: 30 per cent under CLEAR, and 25 per cent under the corresponding Gold Standard tool - and even these methodologies are not in line with the SDGs. There is limited evidence that a technology becoming ""common practice"" drives adoption curves / tipping points in development contexts. Rather, adoption is constrained by other barriers, predominantly financial. "	"Consider removing this penetration condition entirely If there must be a penetration condition, raise the Option 1 eligibility threshold in paras 37(f)/40(d) to at least 30 per cent, with carbon-financed devices excluded per para 67. This is the level CLEAR adopted on the same evidence base. Set the common practice thresholds in para 72 at [X] = at least 30 per cent for urban households and [Y] = at least 30 per cent for non-urban households, consistent with the levels used by CLEAR. Publish the empirical basis for whatever thresholds are adopted."

7	6. Demonstration of additionality	Para 37(f), p. 32; para 40(d), p. 33; para 72 and Question 5, p. 38	"Demonstration of Additionality - Penetration [2/4] The 4.5 per cent penetration condition should be removed. We refute this condition on three grounds: 2) Lack of Evidence in the Literature In the draft methodology it is attributed by Appendix 10 (para 14) to the findings of Gill-Wiehl et al. (2026, Carbon Management 17:1, 2618350) and Berkouwer and Dean (2026). Having examined both studies, we do not believe either supports the number as it is used here. Gill-Wiehl et al. conduct a literature review and meta-analysis of four previous RCTs (published between 2013-2022). From this they find an ANNUAL autonomous-adoption rate of 4.2 per cent per year, observed in the control groups of rural randomised trials. The paper itself is explicit about the limits of that figure. The authors state that their 'review cannot recommend a standard default discount for additionality', because variance across settings is high (0 to 15 per cent, the maximum driven by India's PMUY subsidy programme). They also state that the findings 'are unable to inform the level of additionality of stove projects in urban settings', since every underlying study is rural. Their conclusion is that 'cookstove projects in rural areas can be highly additional'. The PACM methodology draft converts this annual adoption rate into a cumulative stock ceiling, applied to urban and rural markets alike. A market that took a decade to reach 5 per cent penetration would be excluded by a figure derived from one-year adoption rates. Meanwhile the Berkouwer and Dean study (2026) confirm that autonomous adoption is slow even in cities: 3.5 years after their urban Nairobi RCT, only 11 per cent of non-buyers owned an improved stove (roughly 3 per cent per year). This also means that ~90% of these urban households (whose neighbours have adopted clean cooking) have still not adopted it themselves, implying strong financial and other barriers to access."	The 4.5 per cent penetration condition should be removed.
8	6. Demonstration of additionality	Para 37(f), p. 32; para 40(d), p. 33; para 72 and Question 5, p. 38	"Demonstration of Additionality - Penetration [3/4] The 4.5 per cent penetration condition should be removed. We refute this condition on three grounds: 3) Challenging to implement It is unclear how a project will be able to provide robust evidence of the penetration of clean cooking within a given	Either remove this requirement or provide guidance to developers on how they will demonstrate penetration in neighbouring households

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			village / town / city. In particular, how it should gather data on the penetration of other clean cooking projects, or the relative thermal efficiency of the stoves commonly in use locally. For example, a country may have national statistics on the use of ""ICS stoves"", but without an ISO test of locally available models, or an accurate database of stove inclusion in competitor projects, a PD will be unable to calculate whether the 5% threshold will be breached. "	
9	6. Demonstration of additionality	Para 37(f), p. 32; para 40(d), p. 33; para 72 and Question 5, p. 38	"Demonstration of Additionality - Penetration [4/4] 4) non market stoves In addition, and irrespective of the level at which any threshold is set, the penetration count in paras 37(f), 40(d) and 72 should exclude cookstoves that were not acquired on commercial terms. Para 67 already excludes cookstoves installed under registered carbon activities, which we support. The same logic applies to devices distributed free of charge or at nominal cost by NGOs, under Official Development Assistance or donor programmes, or under government subsidy schemes. These are not market appliances and their presence does not evidence an organic business-as-usual counterfactual. The point is illustrated by the evidence the draft itself relies on: the upper end of the adoption range reported by Gill-Wiehl et al. is driven by India's PMUY subsidy programme, not by autonomous commercial uptake. Counting such devices inflates measured penetration in precisely the deeply impoverished communities where carbon finance is most needed, and would exclude activities on the basis of prior donor activity rather than market conditions. "	extend the exclusion in para 67 so that, for the purposes of paras 37(f), 40(d) and 72, the penetration count excludes cookstoves distributed free of charge or below cost under carbon activities, NGO or donor programmes, Official Development Assistance, or government subsidy schemes, and is limited to devices acquired on commercial terms

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10	6. Demonstration of additionality	Paras 37(d)-(e), pp. 31-32; paras 40(b)-(c), p. 33	"Demonstration of Additionality - Poverty Test We do not believe that conducting a poverty test on every household is practical, or in line with preserving the dignity of participant households. Note that families tend to refuse financial questions. Even if they do answer them, financial circumstances in low income households vary greatly month to month. The poverty conditions (national or sub-national poverty index; otherwise an average MPI of 0.2 or more, or income below the USD 4.20/day 2021 PPP line) would in practice exclude most urban and peri-urban charcoal-using populations from the simplified route. This works against the methodology's own evidence base. The Berkouwer and Dean study cited throughout Appendix 10 demonstrates persistent under-adoption and price sensitivity precisely in low-income urban Nairobi. An average MPI of 0.2 is a very high deprivation bar in urban settings, where deprivations concentrate in living-standards indicators rather than spreading across the index. More fundamentally, the criteria conflate poverty with energy poverty. A household above the USD 4.20/day line in an African city still faces rent, food, transport, school and health costs that consume its budget before cooking energy. This is why energy poverty extends well above the income-poverty line, as documented in the methodology's own references (ESMAP, The State of Access to Modern Energy Cooking Services, 2020; MECS 2022). An income line therefore does not measure a household's ability to afford clean cooking. The result is that the population segment with the strongest evidence of additionality for improved charcoal stoves is pushed into the comprehensive pathway."	Remove the requirement for poverty tests

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11	6. Demonstration of additionality	Para 37(b), p. 31	"Demonstration of Additionality - Fuel Efficiency Projects Para 37(b) requires the primary energy source to remain unchanged between the pre-activity and activity scenarios, with its share of cooking events falling by no more than 20 per cent, assessed at the first monitoring report. Because this is an eligibility condition of the simplified additionality route, an activity could become retroactively ineligible after registration and investment. The cause would be household behaviour the activity does not control, such as organic stacking or partial switching driven by fuel prices. Additionality describes the situation at the investment decision; it should not be undone by later behavioural drift. As drafted, the condition creates a regulatory risk that cannot be managed or priced, and it penalises the deep transitions the mechanism seeks to encourage."	Assess additionality ex ante and keep it stable for the crediting period, consistent with para 27, which requires reassessment only at renewal. Treat post-implementation changes in fuel mix through the baseline consistency checks and conservative adjustments of section 14.2.5 and Table 6, which already reduce the baseline where the observed mix is less emissive. Clarify explicitly what consequence follows if para 37(b) is not met at first verification.
12	6. Demonstration of additionality	Para 40(f), p. 33	"Demonstration of Additionality - Modern Fuels Para 40(f) conditions the simplified additionality route for [LPG and] electric cookstoves on a technical lifetime of 10 years or less. For electric appliances, this penalises durability and product quality. It also contradicts the draft's own lock-in treatment: para 45(b) and Appendix 10 exempt electric cookstoves from lock-in analysis because they are the least GHG-intensive technology available. A durable induction stove or electric pressure cooker presents no lock-in risk. Making short product life a condition for the simplified route creates an incentive to build less durable products - the opposite of what households and Art6.4 activity need."	Delete the 10-year lifetime condition for electric cookstoves in para 40(f), relying on the lock-in treatment of section 6.3.1 (electric cookstoves exempt as the lowest-intensity technology). If a lifetime screen is retained for [LPG], link it to the Lock-in risk tool rather than to the additionality route.

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13	7. Baseline scenario	Paras 114-117, p. 50	"Calculation of unadjusted baseline emissions We support waiving the caps where usage is determined with SUMs, and we support the customer-support requirements. Our concern is the 58 per cent cap applied to activities that do not evidence all customer-support actions. We were unable to locate the derivation of this value in the methodology or its appendices. It is also materially below the equivalent values in comparable methodologies: CLEAR and Gold Standard both apply 75 per cent in the corresponding case. A default this consequential should rest on published evidence. In addition, the 58 per cent cap is applied on top of the 95/10 lower-bound requirement for the survey estimate. This compounds conservativeness twice on the same parameter, which reduces accuracy rather than adding integrity."	Set the caps at 90 per cent with customer-support actions and 75 per cent without, waived when SUMs are used - the levels adopted by CLEAR and Gold Standard, which we consider better supported. Publish the empirical derivation of any default retained. Clarify that where the cap applies, it is compared against the survey point estimate, not the 95/10 lower bound, to avoid double-counting conservativeness.

14	Cover note	Cover note para 40 (section 3.9.3 of the cover note)	"User Households For activities without monitored energy consumption, a household qualifies as a user household only if the project cookstove is used, on average, for at least five cooking events per week (cover note para 40). We suggest reconsidering this threshold, for two reasons. First, emission reductions are already quantified from measured fuel consumption: a household that cooks less on the project stove generates proportionally fewer reductions through the KPT-based quantification. The frequency threshold does not change what is credited per household; it excludes households - and their real, measured displacement of baseline fuel - from the count entirely once they fall below a fixed frequency, for which we could not locate a derivation. Second, legitimate cooking patterns vary: smaller households, seasonal patterns, and stacking during a transition can all produce averages below five events per week while the stove remains in regular service. Excluding such households removes real mitigation from the accounting without an integrity rationale. Our own monitoring data shows why this threshold is too strict when enforced as describe in the draft methodology. We have been running continuous digital stove-monitoring studies across five country markets for more than a year. The data shows a wide variety of usage behaviour, across households and across time. A household can average five cooking events per week over the year and still fall below that level during specific periods. Ordinary life explains this: holidays, travel, funerals, celebrations, guests, illness. Such events disturb cooking habits for days or weeks. They barely move the annual average, but they can pull a genuine, regular user below the threshold within a given monitoring period. Enforced strictly per monitoring period, the threshold would eliminate real users, and their real, measured fuel displacement, because ordinary life events disrupted their routine. The exclusion is also not needed for integrity: emission reductions are already quantified from measured fuel consumption, so a household that cooks less generates proportionally fewer reductions. A lower threshold that confirms the stove is in	Lower the user-household threshold one or more cooking event per week during a given monitoring period (as per CLEAR recommendation), or define user households through evidence of continued use of the project cookstove rather than a fixed weekly frequency. Retain the option for activities to apply a higher threshold voluntarily in their monitoring plan, as the draft already provides.

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			regular service protects integrity without penalising normal life. "	

15	4. Applicability	Para 12(j), p. 25; paras 118-119, pp. 50-51; paras 169-172 and equation (55), pp. 66-67; Appendix 8, pp. 132-136	Stove Use Monitors We support SUMs as the preferred approach, and we expressly welcome the activity-specific Hawthorne ratio of equation (55). Replacing an assumed penalty with a measured ratio of cooking events per day is the right architecture. We raise four points. (i) The 75% default (a 25% deduction) applicable until end-2027 appears unreferenced. Footnote 44 states that Appendix 10 explains 'how the default percentage was derived'. However, we were unable to locate any Hawthorne analysis in Appendix 10, or any Hawthorne study in its reference list. If a derivation exists, we ask that it be published. To the best of our knowledge, the published evidence base is in substance one study: Simons, Beltramo, Blalock and Levine (2017, JEEM 86, 68-80). That trial covered about 168 rural Ugandan households, with free stoves distributed for research and intensive daily in-person measurement. It found increased improved-stove use during observation, which reversed when the visits ended. We do not consider that a single study, in one context and under one of the most intensive observation protocols in the literature, is a sufficient basis for a universal deduction set at the maximum of the range - particularly for commercial, purchase-based programmes whose observation conditions differ fundamentally. Facing the same evidence gap, Gold Standard chose a different starting point: a 10 per cent deduction for 2026-27 vintages, escalating to 15 and then 25 per cent only after a formal evidence review at each step. We consider that approach more robust, because it starts where the evidence permits and escalates only when a review justifies it, instead of starting at the maximum without published justification. BURN is currently running paired SUM/KPT measurement studies across its commercial activities. We commit to sharing the results with the MEP as they become available, to help build the consolidated evidence base this parameter needs. (ii) The specification of the SUM-ratio option is incomplete. PCE_KPT is defined in equation (55) as 'Average Energy efficiency measures in household cooking', an apparent drafting error. Para 171 cross-references equations	"(a) Set the default at HEind = 90 per cent (a 10 per cent deduction) as the conservative starting point in the absence of consolidated evidence, with escalation conditional on an MEP review of paired SUM/KPT evidence at each step. Invite developers to submit paired datasets from commercial, purchase-based activities. Publish the evidence base and derivation of whatever default is adopted, as footnote 44 promises. (b) Complete the SUM-ratio specification: correct the definition of PCE_KPT (average project cookstove cooking events per day during the KPT); fix the equation cross-references in para 171; confirm the ratio is capped at 1 per equation (55); confirm the 30-day reference placement rules of Appendix 8 para 5; and state that the ratio is determined on the SUMs sample of section 7.4.2.2. (c) Retain the 2028 SUM transition, but confirm explicitly that representative-sample deployment (95/10, with the oversampling of Appendix 9) satisfies para 12(j), and provide a documented-infeasibility pathway with conservative survey caps where SUM deployment is demonstrably constrained. (d) Specify in Appendix 8 the minimum deployment duration per stove use monitor for the determination of Ψy under para 119, and the minimum number of monitors to be installed in a monitoring period. Confirm that monitored households may be re-randomised in each monitoring period, with any retained panel subject to a maximum tenure, consistent with the rotating-cohort and ex-post sample-frame safeguards we propose at comment 12; note that a fixed panel would itself introduce the observation bias the Hawthorne adjustment seeks to address. Confirm in section 7.4.2 that from 1 January 2028 the determination of Ψy rests exclusively on stove use monitor measurement, and that usage surveys are retained only for household eligibility, confirmation of the presence and functionality of the cookstove, and characterisation of fuel and stove stacking, and do not independently constrain the measured value."

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			(50) and (52) where (54) and (55) appear intended. And para 171 requires SUMs on 'all project cookstoves in households where the KPT is performed', while section 7.4.2.2 and Appendix 8 para 7 operate on a sampling basis; the interplay should be stated explicitly. (iii) The mandatory transition to SUM-determined usage from 1 January 2028 (para 12(j)) is directionally right, and we appreciate that para 118 permits a sampling basis. However, hardware supply, device attrition and field logistics across multi-country fleets justify a limited flexibility mechanism, as we submitted on A6.4-MEP014. (iv) Three parameters governing SUM deployment are unspecified. Appendix 8 is detailed on installation, sensor placement, temperature analysis and publication of the stove-use algorithm, and it specifies sampling by reference to the 95/10 precision guidance, but it does not state: the minimum deployment duration per monitor for the determination of Ψy under para 119, as distinct from the 30 days fixed for the Hawthorne adjustment; the minimum number of monitors to be installed in a monitoring period beyond the general precision requirement; or whether monitored households are re-randomised each monitoring period or retained as a panel, and if retained, for how long. Each is presently left to DOE judgement, which produces inconsistent treatment between activities verified by different entities and leaves participants who have built monitoring systems to a defined standard exposed if a later validation adopts a stricter reading. Relatedly, the residual function of the usage survey after 1 January 2028 is not stated: para 117 disapplies the caps where Ψy is determined by SUMs, but the draft does not say whether a survey result may operate as a ceiling or cross-check where the two diverge.	

16	7. Baseline scenario	Para 93, p. 42; paras 147-149 and equation (35), p. 59; para 198, p. 76	"Sampling of SUMs The monitored-energy pathway requires consumption data from all project cookstoves for the full monitoring period. Paras 93 and 147 define the approach as tracking fuel or electricity use 'for all project cookstoves', and equation (35) sums consumption over every activity household, with no sampling alternative. In our view this conflates two distinct things: metering hardware and monitoring data. We support - and practise - fitting a meter on every device. BURN has deployed more than 711,000 electric cooking devices with 100 per cent on-board metering across seven African markets, and has field-tested every viable data-transmission architecture (GSM/SIM, LoRa, Bluetooth, NB-IoT) over more than 12 product generations. That operational experience is the basis of this comment. Collecting, transmitting and processing complete data from every device, every day, adds substantial cost in low-connectivity conditions - without adding integrity. Statistical integrity comes from a robust random sample drawn from a fully metered population. Because every stove carries a meter, the sample can be completely randomised over the full population avoiding risk of selection bias by only focusing on a ""metered sub population"". This ensure a total integrity of a sampling approach. Data retrieval and processing costs, meanwhile, fall to a fraction, which is decisive for the financial viability of the monitoring activity itself. The draft accepts the same logic elsewhere: para 118 allows SUMs 'on a sampling basis'. The missing-data rules of paras 148 and 198 already anticipate that complete collection will not always succeed. A designed representative sample is statistically stronger than ad-hoc gaps back-filled with 25th-percentile substitutions. One example of how this can be solved is the Alternative Continuous Monitoring Approach in Gold Standard's metered methodology (MECD v2, section 3.2.3), which we consider an efficient model: a revolving representative sample with published integrity safeguards, where the monitored cohort is the greater of the statistical sample size or 5 per cent of the active device population, applied across telemetry configurations with strict meter-accuracy	Amend paras 93, 147 and 149 to permit total monitored energy consumption (tECAS,k,y) to be determined from a statistically representative random sample drawn from the fully metered device population, scaled to the activity population. Suggested safeguards: sample size the greater of the statistical requirement (95/10 on mean consumption per device) or 5 per cent of the active device population; lower bound of the confidence interval where precision is not met; random selection with rotating cohorts; sample frames drawn ex post (at the end of the monitoring period) so that sampled households cannot be identified in advance, eliminating observation-related bias; and retention of the requirement that all project devices are metered, so that no selection bias is possible. At minimum, allow this as a transitional option through 2030 for LDC and connectivity-constrained contexts, mirroring the sampling basis already accepted in para 118.

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			and conservative data-gap-filling rules (confirmed in clarification CLRQ-386, 02/07/2026). A clarification note detailing the monitoring costs of 100 per cent data collection is attached to this submission."	
17	7. Baseline scenario	Paras 94, 96-97, p. 43; Data/Parameter tables 14-15, pp. 87-88; Appendix 7, pp. 127-131	"CCT Calculations Method 1 rests entirely on specific energy consumption (SEC) ratios derived from CCTs. Data/Parameter tables 14-15 require the parameter estimate to meet 95/10 confidence/precision, with the lower bound applying otherwise. However, we were unable to find where the statistical procedure is specified, and this creates four practical problems: (i) The unit of analysis is not stated: is it the individual meal, the cook, or the stove sample? The prescribed design (at least 3 cooks, 3 stove samples per baseline type, and 3 meals per cook per device type, rotated in blocks per Figure 1) yields nested, non-independent observations, for which a naive standard error is incorrect. (ii) It is not stated whether the 95/10 test applies to each SEC parameter separately, or to the SEC_BL/SEC_AS ratio that actually enters equations (7)-(8). Statistically these are very different tests. (iii) No method is indicated for constructing the confidence interval of a ratio. (iv) The arithmetic of the minimum design is demanding: with nine meals per device type and typical CCT coefficients of variation of 15-30 per cent, the 95/10 target cannot be reached. Activities following the minimum protocol would therefore fall to lower-bound haircuts by construction. Without a specified procedure, each DOE would need to determine the statistical approach independently, which risks inconsistent validation outcomes. Complete specification would protect both activity participants and the integrity of verification."	In Appendix 7, specify the complete statistical procedure: the unit of analysis; the treatment of the nested cook/stove/meal design (for example, a mixed-effects model or cluster-robust errors); the method for the confidence interval of the SEC ratio (delta method or bootstrap); and a worked example. State explicitly that the 95/10 test applies to the SEC ratio used in equations (7)-(8). Provide default sample-size guidance (meals per device type) derived from published CCT variability, so that the mean value is realistically attainable and the lower-bound rule is the fallback rather than the default outcome.

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18	7. Baseline scenario	Paras 81-82 and Note 1, p. 40	"Application of the selected baseline approach Response to Note 1: the MEP is considering a hierarchy of methods, or conditions, for choosing between Method 1 (specific energy consumption ratios from CCTs) and Method 2 (baseline emission quotient from KPTs). We suggest not introducing a mandatory hierarchy. Neither method has inherently higher accuracy or integrity; their relative performance is context-specific. Method 1 depends on how well the standard meal and the CCT design represent local cooking practice. Method 2 depends on the quality and representativeness of the baseline and activity KPT campaigns. A fixed hierarchy would force some activities into the method that fits their context less well, without an integrity gain. The existing safeguard is adequate: para 82 requires the selected method to be specified in the PDD or CP-DD and applied consistently throughout the crediting period."	Do not introduce a mandatory hierarchy between Methods 1 and 2. Retain free choice, with the selection justified in the PDD against the activity context (cooking practices, meal standardisation, measurability of fuels) and applied consistently per para 82. If the MEP identifies specific risk cases, address them through targeted conditions rather than a general hierarchy.

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19	6. Demonstration of additionality	Paras 41-73, pp. 33-38	"Option 2: Comprehensive additionality demonstration We support the two-pathway structure in general: a simplified route based on eligibility criteria, and a comprehensive route for all other cases. Our concerns relate to the workability of the comprehensive route as drafted. Option 2 is the mandatory fallback whenever any single condition of paras 37/40 is not met (para 41). It requires a lock-in analysis, an investment analysis (tool A6.4-AMT-002) and a common practice analysis (tool A6.4-AMT-001), all concluded positively (para 43). As drafted, we believe the route would be very difficult to implement or to assess ex ante, for three reasons. (i) The common practice thresholds F in para 72 are blank ([X]/[Y]). No activity participant can know today whether it would pass. An additionality route that cannot be assessed ex ante cannot support investment decisions. (ii) The investment analysis framework was designed for discrete infrastructure investments. It offers no guidance on the evidence expected for a distributed consumer product sold household by household: cost structures, retail benchmarks, revenue mix across thousands of small transactions, or the treatment of PAYGO receivables. (iii) For PoAs, para 44 [bracketed] would require the comprehensive demonstration per component project. Where component projects share the same technology, market and business model, this multiplies cost without any integrity benefit. Because the simplified criteria are restrictive (see our comments on the price cap, the 4.5 per cent gate and the poverty criteria), many legitimate activities would be directed into this route. Its workability is therefore not a secondary issue."	(a) Define the common practice thresholds in para 72 now, and consult on the values; we recommend removing this threshold; if it is retained, it should be set at no less than 30 per cent, the level adopted by CLEAR, with carbon-financed devices excluded per para 67. (b) Add cookstove-specific guidance to the investment analysis: confirm that the simple cost analysis route applies where A6.4ER revenue is the only revenue beyond nominal fees; specify acceptable evidence (audited production or landed cost structures, documented retail prices with and without carbon finance, NPV/IRR without A6.4ER revenue, benchmark selection per the tool's defaults); and confirm the +/-10 per cent sensitivity requirement of para 51 as the outer bound of the assessment. (c) Allow the comprehensive demonstration at PoA level where component projects share technology, target market and business model.

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20	7. Baseline scenario	Paras 86-90, Table 3 and Question 6, p. 41	"Response to Question 6: We support evidence-based caps, and the values adopted are consistent with the published KPT literature. We raise two issues. (i) Para 90 provides that where a flag is exceeded and no justification is accepted, the baseline is capped at the flag value. This converts the flag from a transparency trigger into a de facto second cap at half the cap value. It also leaves acceptance entirely to DOE discretion, without criteria, which makes outcomes unpredictable. We consider the approach in CLEAR more robust: flags trigger justification and disclosure, while the cap remains the single hard limit. (ii) The groups are defined by user location (rural versus urban/peri-urban) rather than by primary fuel. A rural charcoal-using household would be assessed against fuelwood-denominated values, and vice versa. Defining groups by primary baseline fuel (fuelwood, charcoal, mixed) matches how households actually cook and what KPTs actually measure."	(a) Retain the flag as a justification trigger only, with the cap as the single hard limit. Specify the acceptable evidentiary basis for justifications (KPT data, plancha use, wood abundance, peer-reviewed or government sources), so that assessment is predictable. (b) Define the groups by primary baseline fuel (fuelwood / charcoal / mixed) rather than by geography alone, and clarify the treatment of mixed baselines with the worked example of footnote 36.

21	7. Baseline scenario	Note 2 and paras 125-144, pp. 52-58	"Response to Note 2: We support Option 2. Uncertainty should be priced once, transparently, and at the level the rules require. As drafted, the methodology prices the same baseline uncertainty several times, through conservative parameter bounds (the 95/10 lower-bound rules), through the downward adjustment, and potentially also again through para 187. Between the two options, we support Option 2. Baseline energy consumption drives over 80 per cent of the variance in emission reductions (cover note para 32), so limiting the assessment to those parameters captures the uncertainty that matters the most. Option 1 would re-vary parameters that are already fixed at conservative values, counting the same conservativeness twice. But we believe there is a better route than either option, and the MEP has already taken it once. For the companion methodology (A6.4-MEP014-A04, version 02.0), the MEP performed the uncertainty analysis once, at methodology level, through a Monte Carlo simulation and concluded that no activity-level determination was needed. We supported that approach and ask that the same be applied here, for consistency between two sibling methodologies covering the same sector. Two calibration points also deserve attention. First, the Baseline Standard requires that overestimation be 'very unlikely', which corresponds to the 10th percentile; the draft instead applies the lower bound of a 95 per cent confidence interval (para 126), which is the 2.5th percentile, stricter than the standard requires, and applied to inputs already set at conservative bounds. The adjustment should be calibrated to the 10th percentile and computed against mean parameter values. Second, we suggest deleting two add-ons that duplicate protection already in place. The 0.99 factor in para 144 exists 'to ensure' the year-one baseline sits below the conservative BAU but it already does, by construction, since DA_1 is always greater than zero. And the 1 per cent annual escalation (INDA, para 139) assumes the baseline becomes more wrong every year in one direction; in practice, baseline drift is already managed by the methodology itself, baselines are reassessed at crediting-period	"Adopt Option 2 and delete Option 1 or, preferably, determine the adjustment once at methodology level through a Monte Carlo analysis calibrated to the 10th percentile, as already done for A6.4-MEP014-A04 (version 02.0), and state the resulting value in the methodology. Delete the 0.99 factor in para 144, as the year-one crediting baseline is already below the conservative BAU by construction (DA1 = DAinitial > 0). Clarify that DAinitial,UNC is determined with respect to mean parameter values, so uncertainty is not counted both in conservative parameter bounds and in the downward adjustment. State explicitly that parameters already fixed at conservative default values (as identified in the parameter tables) are excluded from the uncertainty estimation, mirroring the list in para 187. Delete the annual escalation INDA (para 139), as baseline drift is already managed through reassessment at crediting-period renewal and the consistency checks of section 14.2.5. Correct the electricity-generation references in para 125 and equation (25). Recommend to the Supervisory Body that this mechanism methodology be exempted from the application of a subsequent-year downward adjustment under section 7.2 of version 01.0 of the Baseline Standard, on the same grounds and in the same terms as recommended in A6.4-MEP014-A04 (version 02.0). Retain paras 139 to 142 as a fallback applying only if the Supervisory Body declines the exemption, mirroring the structure adopted in the companion methodology."

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			renewal, and the consistency checks of section 14.2.5 adjust the baseline whenever monitoring shows the fuel mix has changed. An escalation on top of these mechanisms shrinks the crediting stream by design, without a physical justification we could identify. We further note that the MEP has already recommended to the Supervisory Body that the companion methodology A6.4-MEP014-A04 (version 02.0) be exempted from the application of a subsequent-year downward adjustment, under section 7.2 of version 01.0 of the Baseline Standard, retaining the 1 per cent annual increase only as a fallback should the exemption be declined. The stated grounds were that the methodology applies exclusively to low-income and impoverished households where autonomous adoption of improved cookstoves is negligible, and that the activities deliver health and gender benefits alongside the climate benefit. This methodology imposes the same population tests on its simplified additionality route: para 37(d) requires low income or poverty to be demonstrated against a recognised index, and para 37(e) caps income at the World Bank lower-middle-income threshold. The households are the same, the evidential basis is the same, and para 142 acknowledges the same affordability barriers. The treatment should be the same. Finally, para 125 and the subscript UNC_BE,EG,CP1 refer to 'baseline emissions from electricity generation', which appears to be a leftover from another methodology"	

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22	11. Emission reductions	Para 187 and Note 3, pp. 70-71	"Response to Note 3: We ask the MEP to demonstrate compliance with the one-sided 90 per cent confidence requirement at the level of the mechanism methodology, in Appendix 10, rather than requiring each activity to undertake uncertainty propagation or Monte Carlo simulation. The reason: the methodology already embeds layered conservativeness - conservative default emission factors and NCVs; 95/10 sampling rules with conservative bounds where precision is not met; baseline caps and flags; usage caps; the Hawthorne adjustment; the downward adjustment; and the year-one 0.99 factor. A methodology-level demonstration would show, once and transparently, that this stack of provisions meets the confidence principle. Activity-level simulation would re-derive the same conclusion at every activity, at significant cost. This also mirrors the approach the MEP adopted for the companion methodology in response to stakeholder input, which we supported. We support the para 187 list of parameters deemed conservative that need not be varied."	Conduct and publish a methodology-level Monte Carlo analysis demonstrating that the combined conservative provisions fulfil the 90 per cent confidence principle for representative activity configurations. Remove the activity-level requirement, retaining it only as a fallback for atypical configurations identified by the analysis. Retain the para 187 exclusion list for parameters fixed at conservative values.

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23	12. Avoidance of double counting	Para 190 [bracketed] and Note 4, p. 72; para 193, p. 73	"Response to Note 4: We support safeguards against double counting with safe drinking water activities However, para 190 allocates the correction to the wrong side. Para 190(c) requires the cookstove activity to remove the fuel savings linked to boiling drinking water. Yet the cookstove activity measures its fuel savings: through KPTs or metering, every tonne claimed was really burned and really displaced, whatever the household cooked or boiled. A water activity, by contrast, credits an assumption that households would otherwise have boiled their water. When a measured claim and an assumed claim overlap, the correction should apply to the assumed one, not the measured one. Otherwise the mechanism deducts real, verified reductions to protect estimated ones. In addition, para 190(b) asks activities to prove that no water-crediting activity exists in the area, using CORSIA and ICVCM programme data. Registries do not publish activity boundaries at that level of detail, so participants would be asked to prove a negative with data that is not available. Finally, para 193 already requires household-level waiver certificates confirming that reductions are claimed under no other programme, which addresses the same risk where it actually arises: at the household."	Retain a double-counting safeguard for overlaps with safe drinking water activities, but reverse the allocation: where an overlap exists, the water activity's baseline should exclude the fuel savings already captured by the measured cookstove baseline, rather than deducting measured savings from the cookstove activity. Replace the proof-of-absence requirement in para 190(b) with a declaration by the activity participant, supported by a check of publicly available registry information and DNA confirmation where available. Retain para 193 (household waiver certificates) as the household-level safeguard.

24	10. Non-permanence provisions	Paras 182-184, p. 69; cover note paras 44-46, pp. 11-12; Appendix 10 section 5, pp. 152-155	"Non-permanence Provisions ICS projects reduce emissions by preventing biomass combustion at the household level. Once avoided, these emissions cannot be retroactively re-emitted because combustion never occurred. When that combustion is avoided, the associated CO2 is never emitted. No carbon is captured, sequestered or stored. In an ICS project there is no sequestration event and no stored stock of 'saved' carbon that could be reversed: once the combustion does not occur, the avoided emission is permanent. We welcome the exemption from reversal monitoring, reporting and post-reversal actions (para 182). It correctly reflects that activity participants have no control over the relevant reservoirs. However, we continue to consider - as we submitted on A6.4-MEP013/014 - that fNRB-based demand-side cooking activities should also be exempt from Reversal Risk Buffer Pool contributions, for three reasons. First, the risk the buffer addresses is already managed: the fNRB parameter discounts every credit for the renewable fraction of the biomass. Charging a buffer on top prices the same risk twice. Second, the reservoirs concerned are geographically remote, unattributable and outside the activity's control; a cookstove activity cannot cause or prevent their disturbance. Third, contributions are immediately cancelled (para 184), which makes the buffer a permanent deduction rather than an insurance mechanism. Other Paris-aligned standards, examining the same question, concluded that buffer contributions are not appropriate for avoidance activities where the developer has no control over the reservoir; they manage non-permanence through fNRB updates at crediting-period renewal instead. We consider that treatment more accurate, and we note the ICVCM Board reached a consistent conclusion for cookstove methodologies. We also understand that the draft reversal-risk tool derives its default natural-reversal values from observed carbon losses in standing forests, using the absolute-reversal approach of Wu et al. (2026). If that is the intended basis, the mismatch is compounded: disturbance rates of standing forest carbon have no causal link to	Exempt fNRB-based cookstove activities from buffer pool contributions (Fbuffer = 0), and manage macro-level non-permanence through mandatory fNRB updates at crediting-period renewal, with a catastrophic-disturbance check. At minimum: (i) publish the draft Reversal risk assessment tool and the resulting Fbuffer values for public consultation before this methodology is recommended for adoption; and (ii) bound Fbuffer at a de minimis level, reflecting that the reservoirs are already discounted through fNRB.

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			emission reductions achieved by burning less harvested wood, and their application to clean cooking in LMIC contexts would not, in our view, be appropriate. Finally, the parameter Fbuffer depends on the Reversal risk assessment tool, which is still under development. The actual impact of para 183 therefore cannot be assessed in this consultation."	

25	15. Data and parameter not monitored	Data/Parameter tables 9-10, pp. 84-85; Appendix 10 para 20, p. 151; cover note para 42, p. 11	"Wood - Charcoal Conversion Factor The methodology adopts upstream charcoal emission factors based on a 5:1 wood-to-charcoal conversion factor. In our reading, this value sits outside the range of the evidence Appendix 10 itself presents. The controlled-condition kiln studies underlying the emission factors (Bertschi et al. 2003; Smith et al. 1999; Pennise et al. 2001) average 3.5:1, but the Appendix rightly sets these aside as unrepresentative of field operation. The values it then treats as representative all exceed 5:1. The review of field-focused conversion-efficiency studies (4C 2025a) centres on 5.8:1. The only peer-reviewed field study of operator-run earth-mound kilns we are aware of - Urban et al. (2026), Biomass and Bioenergy 209, 108914 - measured a weighted average of 7.1:1 in Ghana and Malawi. These are the kilns that produce most artisanal charcoal in Sub-Saharan Africa. We would add that this 7.1:1 figure is measured at the kiln gate. The same study reports that as the system boundary expands to account for mass lost during harvesting, transport and distribution, the conversion factor rises further, reaching 9.5 kg/kg in Malawi and 10.6 kg/kg in Ghana, or approximately 10.0 kg/kg overall. Charcoal purchased by a household embodies those losses. On either boundary, kiln-gate or full supply chain, a 6:1 factor remains conservative, and by a substantial margin against the latter. The Appendix concludes that 'with this, a conversion factor of 5:1 is considered conservative' (para 20, p. 151). We respectfully suggest this conclusion does not follow from the evidence presented: 5:1 is not a conservative point within the field-evidence range, it sits below it. We have not been able to identify, among the cited studies, one that supports 5:1 for operator-run kilns; if such evidence exists, we ask that it be published. We also note that CLEAR and Gold Standard, reviewing the same sources, adopted 6:1 for Sub-Saharan Africa. Divergent values would create different emission factors for the same tonne of charcoal across crediting programmes - an outcome we have consistently asked standard-setters to avoid."	Adopt a 6:1 conversion factor for artisanal charcoal in Sub-Saharan Africa and comparable LMIC contexts, based on the field evidence in Urban et al. (2026) and the 4C review, with lower ratios retained for regions where kilns are demonstrably more efficient. Update the upstream CO2 and non-CO2 emission factors in Data/Parameter tables 9 and 10 accordingly. Alternatively, permit activity participants to justify a regional conversion factor from published field studies.