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| | **CALL FOR INPUT** |
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| 1 | 10. Non-permanence provisions | 183 | As already recognized by the draft methodology as per Paragraphs 45 and 46 of the Cover Note as well para 31 in Appendix 10, “activity participants neither control the relevant carbon reservoirs nor have any incentive to increase reversal risks, with their interests aligned toward reducing biomass consumption and associated emissions”. “Activity participants have a direct economic interest only in actions that reduce emissions from the reservoir (rather than increase them)”. Also, “reservoirs are geographically distinct from the locations of the cookstove deployment by the mitigation activity and observed changes cannot be attributed to the activity”. In addition, one must note the conceptual fact that losses of carbon stocks in the referred reservoirs are the result from higher pressure on forest carbon stocks (unrelated to the activity as above) and, by definition, would lead to an increase in the fraction of non-renewable biomass factor (fNRB) at the activity region, either at national or subnational levels as applicable. The fNRB factor applicable to the activity is defined at the beginning of the crediting period, as per the recently updated fNRB tool. Since it is set before the potential carbon stock loss events have occurred (carbon stock “reversals” as referred by the methodology), the activity fNRB is logically lower than what a new fNRB would be once it eventually incorporates such carbon losses. Hence, any further losses of carbon stocks after a clean cooking activity begins do not mean a reversal of credited removals nor a reversal of any type of credits or climate benefits. At last, the incompatibility of non-permanence/reversals provisions with fNRB based clean cooking methodologies is illustrated by several inconsistencies in the application of the Reversals Standards and the draft Risk Reversals Tool, as below: (pages/paragraphs below refer to the Reversals Standards and the Risk Reversals Tool) 1) The definition of Fbuffer refers to it as the “fraction of the net enhancement of storage GHGs in a reservoir resulting from the A6.4 activity”, i.e. potential removals. However, removals are never claimed by a clean cooking activity, let alone the fact that the carbon stocks are not under the control of the | The best way to incorporate any changes to the renewability of the biomass subject to crediting under a project is to ensure that the use of the fNRB factor be properly considered and updated in adequate intervals, which could result in higher or lower amounts of credits in future periods. Since the current methodology already requires fNRB to be updated at crediting period intervals (Data/parameter table 4 in Section 14 – Monitoring Requirements), we propose to exempt clean cooking projects relying on fNRB based methodologies not only from the monitoring criteria associated with reversals, but also from discounting reversal risks as (fBuffer), based on the rationale explained in the justification of this proposed solution. If any carbon stocks are lost after a clean cooking activity begins, they would make the ERs claimed under such an activity more conservative as such losses of carbon stocks would have not been accounted for in the fNRB factor upon which ERs are generated in that crediting period. In this context, if buffer discounts are applied to fNRB-based clean cooking activities, there would be a double discount of ERs, not grounded in the physical reality of carbon fluxes. |

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| | | | activity participants. 2) All risks of reversals defined para 37 of the Reversals Standard point to the risk of carbon losses, not net enhancements. As explained above, losses of carbon stocks after the project begins lead to more conservative ERs. To illustrate the point, Equation 9 of the methodology determines that the risk of wildfires should be factored into fBuffer. Why should clean cooking activities apply discounts in ER generation because of a wildfire that leads to carbon losses outside of the control of the project and whose stock losses will never be accounted for ER generation in the activity? 3) The definition of reversals in the Reversals Standard, also quoted in Paragraph 20 of the draft tool, clearly determines that a reversal occurs when the net change in storage is less than zero, i.e. when carbon stock losses occur. Also, all definitions in paragraph 6 of the tool refer to reversals as the loss of carbon stocks. As explained above, clean cooking activities are not subject to such a risk because if carbon losses occur they will actually lead to an increase in fNRB and as such the activity ERs will be more conservative, as defined on an ex-ante basis. To illustrate the rationale: reversals = losses of carbon stocks = potential higher use or higher availability of non-renewable biomass (higher fNRB) = activity ERs become more conservative in the activity, as fNRB has been defined before the further losses of carbon stocks (i.e, it will be a lower fNRB, de facto), let alone the fact that they are not controlled by the activity. In any case, fNRB is already a monitoring parameter in the draft methodology and will be updated at crediting period intervals. | |

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| 2 | 14. Monitoring requirements | Data / Parameter table 9. | By recognizing the most recent scientific references on wood to charcoal conversion factors, especially Urban et al 2026 and 4C 2025a, the methodology has made substantive progress. However, considering that the most recent evidence point to the weighted average of 7:1 and that the previous IPCC value was 6:1, we suggest to adopt a 6:1 factor instead of the 5:1 factor currently proposed by the methodology for three main reasons: (i) it represents transparent and objective criteria (below the most recent value and consistent with an IPCC factor) , (ii) 6:1 is still quite conservative, as it is lower the most recent data (7:1) and (iii) it would not over-penalize a major factor for the calculation of ERs, as the 5:1 is almost 20% higher than the higher end of the most recent evidence (7:1). It is worth recalling that in Urban et al 2026, the authors report that as the system boundary expands to account for all mass lost during harvesting, transportation, and distribution, the research registered increases in the conversion factor, reaching 9.5 kg/kg in Malawi and 10.6 kg/kg in Ghana (10.0 kg/kg overall). As such, a 6:1 factor is indeed conservative. | Adopt a 6:1 wood to charcoal conversion factor instead of 5:1 based on the objective criteria mentioned in the justification. |

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| 3 | 14. Monitoring requirements | Data / Parameter table 4 in Section 14 and paragraph 41 of the cover note | The Modeling Fuelwood Savings Scenarios (MoFuSS) tool provides more detailed and accurate assessments of fNRB than previously available and represents a marked improvement over older estimates. However, like all models, it has limitations. In particular, the estimates produced for A6.4-AMT-009 rely on limited available data at the time the model was run. Researchers were required to make some assumptions about key parameters. In some contexts, these assumptions do not align with the actual situation on the ground and lead to inaccurate fNRB estimates. In cases where there is reason to believe the model estimates do not reflect reality on the ground and there is local data available on key input parameters, we suggest that more accurate fNRB estimates can be developed leveraging the MoFuSS model. As the model itself is well validated, the remaining question would be the validity of revised input parameters. To ensure the integrity of this approach, the data supporting changes to the default input parameters would need to be reviewed for quality and relevance. | Allow revised fNRB estimates in addition to the current options provided. In cases where relevant national and subnational data are available, it may be possible to produce more accurate estimates of fNRB for specific countries. Where the MoFuSS team is able to leverage this data and the existing MoFuSS tool to develop more accurate fNRB estimates, we recommend these be allowed under the methodology. To ensure that these revised estimates are valid, we further recommend that revised fNRB estimates and documentation outlining changes in input parameters and supporting data and evidence are provided to a DOE or to the MEP/SB directly for review and approval alongside the revised estimates. The use of independent research teams, such as the MoFUSS team, could also be a requirement to avoid any bias. |

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| 4 | 8. Activity scenario | paragraphs 169-172 | The proposed Hawthorne Effect Adjustment imposes a penalty on emissions based on an estimated impact on stove usage (cooking events), with an underlying assumption (emissions are directly proportional to number of cooking events) that is unfounded. Footnote 44 reads “See Appendix 10 for further details on the Hawthorne Effect, the activity emissions adjustment, and how the default percentage was derived.” Appendix 10 does not include a section on the Hawthorne Effect. This adjustment, as structured, assumes: 1) there is a significant change in behavior by households during project KPTs, leading to inaccurate, biased estimates of activity emissions, and 2) emissions is directly proportional to number of cooking events. It is not clear that the Hawthorne Effect on KPTs exists. Nor is it clear what the magnitude of such a bias is. The entire evidence base covering the Hawthorne Effect on KPTs is two studies of limited scope that are directly contradictory (from Simons et. al and Berkeley Air Monitoring Group). These studies cover two interventions (one commercial, neither carbon projects) with three stove models. Both studies were conducted over six months in Uganda (the BA study included an additional site in South Africa). There is no evidence—published or unpublished—of any Hawthorne effect on KPT-measured fuel consumption from South Asia, Latin America, Central or West Africa, or any other context. There is no evidence from other stove/fuel types. The BA study found no difference in stove usage during KPTs. The Simons study found an increase in intervention stove usage by 53% during KPTs. These estimates are entirely driven by how long households cooked on intervention stoves, not by measuring fuel consumption with and without observation. Fuel consumption is not directly proportional to stove use time, nor cooking events. Thus, Simons et al. modeled unobserved fuel consumption from observed fuel consumption (KPT measurements), stove use data, and burn rates. Burn rate of the intervention stove was based on laboratory testing, which is not representative of field operation. The modeled Hawthorne effect on fuel consumption they found was | We recommend the Hawthorne Effect Adjustment be removed. If an adjustment is included, it should be limited to the stove use data (in line with the literature, which measured the impact of observation on stove use measurements). The methodology already accounts for this by (1) capping stove usage for surveys; and (2) requiring SUMs-based usage estimates to exclude the KPT period. |

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| | | | approximately 14%, far lower than the 25%. Following the same approach to translating stove use time measured into an implied fuel consumption effect in the BA study, there is no difference in fuel consumption during KPTs and non-KPT periods. The proposed adjustment factor and equation, as structured, goes a step further and assumes that cooking events (not cooking time) are directly proportional to emissions. Further, the intervention design may have inadvertently contributed to the effect estimated by Simons et al. Participating households purchased one stove and were then given a second stove as a surprise gift by researchers a few weeks after receiving the first. This may have created expectations of additional gifts, inducing households to behave differently during KPTs (and other visits from researchers). Applying a universal deduction to all KPT-based projects globally, regardless of stove type, geography, or program model, extrapolates far beyond what a single-site Ugandan trial (that was not replicated by the Berkeley Air study) can support. There is scant evidence, in any direction, of the Hawthorne Effect on KPTs. Drawing a conclusion about the magnitude or direction of this effect on activity emissions is premature. Without a credible empirical foundation, this cut goes beyond conservative to arbitrary. | |

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| 5 | 16. Data and parameter monitored | Data / Parameter table 24; paragraph 7 (v) & Section 2: Definitions | A user household is now defined as households where the activity stove is used at least 5 times per week. This threshold may make sense in some context/seasons, where typical cooking patterns are multiple times per day throughout the year. However, during lean seasons, cooking reduces to once a day or even less due to scarcity of food in some regions. The 5 times per week threshold may inadvertently discount households that are true adopters. For example, if a household cooks 4 times on an activity stove and 1 time on a baseline stove in a given week, they would not be a user despite 80% of their cooking events being on activity stoves. Further, KPTs are conducted on any household from the sample, not just households where cooking occurs at least 5 times per week. As such, the lower fuel savings that these non-user/occasional user households represent are already incorporated into the estimate of activity emissions. Setting this threshold at 5 times per week therefore results in cuts in both usage and fuel consumption, leading to an unrealistic activity emissions estimate. | Set the threshold to 1 time per week. |
| 6 | 6. Demonstration of additionality | Paragraph 27; Paragraph 85 and Section 7: Baseline Scenario | Additionality must be reassessed at each crediting-period renewal (para 27), and the baseline scenario re-identified at renewal or five years, whichever is first (para 85). While periodic review supports integrity, a full reassessment of additionality at every renewal introduces significant revenue uncertainty over a project's life: an activity that was additional at registration could be found non-additional at renewal because of market shifts it helped create, undermining the long-term investment case that carbon finance is meant to secure. Frequent baseline re-identification compounds this by resetting the crediting basis. | Confirm that additionality is demonstrated once at registration and that any reassessment at renewal is limited to confirming continued eligibility (e.g., regulatory surplus), rather than a full re-demonstration that could retroactively disqualify an operating activity. Align baseline re-identification with the renewal cycle and provide transitional protection for ERs already contracted, to preserve investment certainty for developers. |

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| 7 | 7. Baseline scenario | Paragraphs 125-140 | Section 7.5 imposes a downward adjustment (DA) on baseline emissions: an initial DA taken as the higher of an uncertainty-based value (Eq 25) and a minimum-conservative value of 10% of the (BEy1 − AEy1) gap (Eq 26/27), escalating by a fixed INDA = 1%/yr (Eq 32/33; para 139), giving the adjusted baseline BEadj,y = BEy × (1 − DAy) (Eq 31). There are three concerns for fNRB-based cooking activities. (i) Framing. The step is written "for baseline emissions from electricity generation" (para 125) and draws on the Baseline Standard's uncertainty provisions; its extension to fuelwood/charcoal cooking baselines is not substantiated. (ii) Double-counting of conservativeness. For an fNRB-based activity, conservativeness is already secured through the ex-ante, periodically-updated fNRB, the Hawthorne adjustment (Eq 54, 25%), the usage caps (paras 114–117), and the reversal buffer (Eq 59). Layering a further, escalating baseline haircut double counts the same conservatism. (iii) The 1%/yr escalation has no physical basis. Baseline fuel use is not systematically over-stated in a way that grows each year, and declining stove usage/drop-off is already captured through adoption monitoring and periodic re-surveys/KPTs. The escalation produces an ER stream that shrinks year-on-year — on Bridge Carbon's modelling of a representative activity, roughly 10% in year 1 rising to ~24% by year 5 — undermining the investment certainty carbon finance is meant to provide. The MEP has expressly invited feedback on the two initial-DA options (para 125, Note 2). | For activities quantifying ERs on the fNRB approach, remove the Section 7.5 downward adjustment. If a downward adjustment is retained: (a) delete the annual escalation (INDA), which lacks a physical basis for cooking; (b) do not stack it with the Hawthorne adjustment (Eq 54) and the reversal buffer (Eq 59) — apply a single conservativeness mechanism, not three; (c) adopt Option 2 (limited-parameter uncertainty, Baseline Standard para 64(b)) rather than Option 1; and (d) correct the para 125 framing, which currently refers only to "electricity generation". On the MEP's request for feedback on the two options, Bridge Carbon supports Option 2. |

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| 8 | 4. Applicability | Paragraph 12 (e)-(f) | Para 12(e) requires the cookstove identifier to be either (i) a tag/plate affixed or fired into the stove body such that its removal would damage or destroy the stove, or (ii) a SUM with a serial number permanently installed on the stove; 12(f) rules out detached household ID cards as the sole means. Bridge Carbon supports robust, permanent, one-to-one stove–household identification and the identifier-management system in 12(f). However, limiting acceptable means to these two options is disproportionately costly and impractical at programme scale: destructive-removal tags/plates add manufacturing cost and are not offered by all producers, and mandating a SUM on every credited stove (SUMs are normally deployed on a representative sample) imposes major hardware and data costs without a corresponding integrity gain. Widely used alternatives deliver equal or better durability and traceability when registered in the identifier-management system already required under 12(f). Such options include laser-engraved or stamped serial numbers, serial numbers moulded/cast into the stove body, and a durable machine-readable code (QR/barcode). | Make para 12(e) outcome-based rather than prescriptive: accept any permanent, unique identifier that (1) is affixed to, engraved/stamped into, moulded into, or otherwise embedded in the cookstove so as to remain legible and attributable for the crediting period, and (2) is registered in the identifier-management system under 12(f). Suggested added means: "(iii) a permanent serial number engraved, stamped or moulded into the body of the cookstove, or a durable machine-readable code (e.g., QR or barcode) affixed so that it remains legible for the crediting period, provided it is recorded in the identifier-management system required under (f)." A stove use monitor should remain an acceptable means of identification but not be required. |
| 9 | 4. Applicability | Paragraph 11 (iii) | The condition that user households be "in areas that do not otherwise fulfill the applicability conditions" from the draft Energy efficiency measures in household cooking effectively channel most rural cookstove projects to that methodology. That methodology limits baseline assessment to a simple default, which is often less accurate than a measured baseline, as is allowed in this methodology. As a result, a significant number of rural cookstove projects would have inaccurate baselines. For large-scale projects in particular, this could lead to (1) inaccurate estimates of emissions reductions or (2) present an insurmountable barrier to engaging in A6.4. | Remove this applicability requirement. Instead, for projects that could use either methodology, allow the project developers to select the one most appropriate to their project and justify this decision. |

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| 10 | 4. Applicability | Paragraph 11 (a) (ii) | The condition that user households be "in countries where rural electrification is below 50 per cent [and LPG distribution networks are not present];" may leave out many households who do not truly have access to electricity or LPG as an option. Cooking with electricity requires a higher amperage circuit than other commons tasks (such as lighting). Initial electrification efforts often focus on lower cost, lower amperage connections, which in turn do not support electric cooking. Rural electrification of 50% or more may not in fact ensure that electric cooking is an option for these households. The condition "LPG distribution networks are not present" is not specific enough and cannot reasonably be assessed by a project developer. LPG is likewise subject to high costs for initial use as well as variable regular costs (depending on the price and availability of LPG). Due to this, households' adoption of LPG is not always straightforward. That is, households may have an LPG stove but use it only seasonally or for specific tasks when gas is available while continuing to use biomass for the bulk of their cooking. Further, the additionality requirements address project households use of LPG and electricity sufficiently. | Remove this applicability requirement. |

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| 11 | 7. Baseline scenario | Paragraphs 114-117 | Under Option 1 (until 31 Dec 2027), the share of user households (Ψy) determined by survey must be applied as the lower bound of the 95/10 confidence interval and, in addition, capped at 90% or 58% even where the survey indicates a higher usage rate (para 114). The 90% cap requires a prescribed set of customer-support actions (para 116); otherwise the value is capped at 58% (para 117). Combining a lower-bound (95/10) treatment with an absolute cap penalizes an activity twice and, in the 58% case, discounts creditable usage by more than 40 percentage points irrespective of demonstrated real-world adoption. This can materially understate ERs for high-performing programmes and is a significant feasibility barrier for smaller developers ahead of the 2028 SUMs transition. Further, the 58% is not evidence-based. | Recommend reverting to the previous cap of 75% for usage for surveys without customer support actions. |
| 12 | Appendix 2. Sample template… | Paragraphs 2-7 | While it is critical to ensure that households enrolling in activities have a clear understanding of their rights and the agreement they are entering into with the waiver, the requirement to audio-record the explanation at each household presents an enormous practical barrier without significantly improving integrity. This additional requirement may also discourage households who would otherwise benefit from an activity from participating. Similarly, the requirement to present a national ID may exclude marginalized communities. | We recommend removing these requirements or making them optional. |
| 13 | 6. Demonstration of additionality | Paragraph 37 (d) (iii) | While poverty status can support an additionality argument, its use is as a proxy for energy access. However, these are not one to one. The inclusion of stringent poverty requirements, such as demonstrating the income level of the target population is lower than the poverty threshold may require collection of sensitive data from households and pose a barrier to participation in a program they could otherwise benefit from (as means-testing often does). | Remove the poverty requirement as the energy access considerations will already address what this component is intending to address. |