CALL FOR INPUT

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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	3. Normative and informative references	45 and 46	We support the conclusion that projects applying this methodology are exempt from the requirements relating to monitoring, reporting, and managing reversals (paragraph 45). However, a Reversal Risk Buffer Pool deduction should not apply to the project types covered in this methodology (paragraph 46). There is a fundamental difference between stock-based claims (which depend on the continued existence of a reservoir) and flow-based claims (which depend on emission avoided over a specific time period). See the argumentation outlined in Carbon Pulse https://carbon-pulse.com/533599/ Labbate, G.; Hoong Chen, T. and Martins Barata, P. (2026) COMMENT: Should cookstoves meet permanence requirements? The question Article 6.4 has yet to ask.	Remove requirement for a buffer pool deduction.

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2	4. Applicability	11	Regarding Question 2: Enabling access to clean cooking technologies is essential to achieving SDG7. We fully acknowledge that LPG is an essential part of achieving this goal and should therefore be a key part of the solution. However, we question whether carbon finance is the right type of finance to support LPG stove distribution and would advocate for other types of (results-based) financing to support access to LPG stoves and fuels.	See above
3	4. Applicability	12(j)	Whilst we support the need for improved tracking of stove usage, and therefore for the employment of SUMs, the MEP should also keep in mind the practical implications of this requirement for projects, alongside existing experience with SUMs and the feasible rate of deployment. Given that this methodology is yet to be approved, the 1 January 2028 requirement will essentially require projects to have SUMs on all devices by the time of their first issuance.	More feasible alternatives to consider include: - Adopting a phase-in approach of SUMs (e.g. by 1 January 2028 x% of devices must have a SUM, with the percentage raised up to a statistically relevant cap each year) - Delaying the date from which this requirement would apply to allow projects to get up and running, including building internal capacity to manage and interpret the data collected through SUMs - Requiring projects to employ SUMs, but for a statistically sound and randomly selected portion of project technologies (rather than 100% of devices)
4	6. Demonstration of additionality	37(f)	This threshold is likely to exclude several areas from access to clean/improved cookstove technologies, meaning that households whose access should be enabled through carbon finance will miss out. In addition, the data needed to demonstrate compliance with this criterion is unlikely to be available. Countries rarely have data available on the efficiency of stoves used by households, especially not disaggregated regional data. Some countries publish data on fuel usage, but not the types of stoves used (and their related efficiency). The existence of >4.5% stock does not mean a project is no longer additional.	We suggest to remove this requirement.

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5	6. Demonstration of additionality	37(g)	We assume these criteria are included to allow projects to be automatically additional if they can demonstrate compliance with the above listed criteria. If so, the methodology would benefit from a statement on this for better clarity. There are costs other than production that project developers need to cover. This includes device transportation from manufacturing to the household, marketing, customer outreach and support, provision of repair and replacement services etc. Whilst we appreciate that effort is made to simplify which costs need to be reported to demonstrate compliance with this criterion, we raise the risk that a 50% cap may be overly prohibitive (unless supported by literature?). In addition, many PDs do not manufacture their own stoves but instead purchase devices for distribution. If this criterion is to remain included, we therefore suggest to include a statement to allow for this scenario.	Include clear statement on projects being additional with no further need to demonstrate additionality if all criteria are met. Reconsider 50% cap as this may be overly prohibitive. Include statement to allow for scenario in which project stoves are purchased from a manufacturer (e.g. purchase cost of device)
6	7. Baseline scenario	90	Question 6: Suggest to remove the requirement to provide additional justification for flag values - this to avoid creating additional work for project developers in applying an already intensive methodology.	Question 6: Suggest to remove the requirement to provide additional justification for flag values - this to avoid creating additional work for project developers in applying an already intensive methodology.