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Name of submitter	Andrea Bonzanni
Affiliated organization of submitter	IETA
Email of submitter	bonzanni@ieta.org
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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	4. Applicability	Paragraph 11(a)(iii) and 11(b)(ii)	The draft methodology prevents activities that otherwise meet the applicability conditions of the “Energy efficiency measures in household cooking” methodology (A6.4-AMM-00X) from using this methodology. Such an approach is problematic for improved biomass cookstove activities because the two methodologies use materially different baseline approaches. In particular, this methodology allows historical/actual baseline quantification based on representative pre-activity data and KPTs, whereas routing an activity automatically to the “Energy efficiency measures in household cooking” methodology may prevent the use of robust activity-specific historical evidence. The availability of a simpler methodology should not, by itself, exclude use of a more data-intensive methodology that better reflects actual project conditions. We also question the procedural basis of this applicability condition as it is unusual for a methodology to prevent an activity from using another one under a crediting mechanism. Moreover, no mention of this condition is made in the explanatory note.	Delete paragraph 11(a)(iii) and the equivalent exclusion in paragraph 11(b)(ii). Where an activity meets the applicability conditions of both clean-cooking methodologies, allow the activity participant to select the methodology that is most appropriate to the activity and available data, and require the selection to be justified in the PDD or CP-DD. The same mitigation outcome must not be credited under both methodologies.

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2	4. Applicability	Paragraph 11(a)(i)–(ii)	The restrictions for fuelwood activities based on an urban/non-urban classification and a country-level rural electrification threshold are not sufficiently representative of conditions faced by activity participants. There is no evidence of correlation between national electrification rates and access to reliable and affordable electricity to support the power requirements of electric cooking in a specific area. Likewise, restricting fuelwood transitions to non-urban locations does not reflect continued fuelwood use in low-income urban and peri-urban communities. The use of such high-level metrics risks unduly excluding target populations even where the proposed project technology remains additional and appropriate to local cooking needs.	Replace paragraph 11(a)(i)–(ii) with an activity-area assessment. Eligibility should be based on evidence for the target population regarding actual cooking fuels and technologies, reliable and affordable access to alternative cooking energy, and—where electricity is relevant—the technical ability of the local electricity system to support electric cooking. Do not apply a national rural-electrification percentage or an urban/non-urban classification as a stand-alone exclusion criterion.
3	4. Applicability	Paragraph 11(d); Question 2	IETA supports inclusion of high-efficiency LPG cookstoves where the activity demonstrates a transition from a higher-emission baseline and the methodology contains safeguards against long-term fossil-fuel lock-in. Safeguards such as avoiding project-driven development of new LPG distribution infrastructure may be adopted to address concerns, but a full exclusion of LPG cookstoves would be unjustified and counterproductive. Moreover, eligibility should be assessed against the actual alternatives and infrastructure in the activity context rather than relying on broad electrification proxies. The methodology should preserve a technology-neutral pathway where LPG can deliver verified near-term GHG reductions and improved cooking access without creating new long-lived fossil infrastructure attributable to the Article 6.4 activity.	Remove the square brackets around LPG eligibility and retain LPG as an eligible project technology. Retain targeted lock-in safeguards, including that the Article 6.4 activity does not result in development of new LPG distribution infrastructure and that the activity participant is not directly involved in LPG production or distribution. Require the activity participant to demonstrate that LPG cooking results in lower GHG emissions than the relevant baseline cooking system and to assess available lower-emission alternatives in the activity context.

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4	4. Applicability	Paragraph 12(e)–(f)	IETA supports permanent unique identification and traceability of project cookstoves. However, limiting the acceptable identifier to a destructive-removal tag/plate or a permanently installed stove-use monitor (SUM) is unnecessarily prescriptive and can add material hardware and manufacturing costs at programme scale. durable engraved, stamped, moulded, QR or barcode identifiers can provide equivalent traceability when linked to the identifier-management system already required by paragraph 12(f). SUMs should remain an acceptable monitoring and identification option, but should not be required merely to establish stove identity.	Make paragraph 12(e) outcome-based. Add an option such as: “(iii) a permanent unique identifier, including a serial number engraved, stamped or moulded into the cookstove, or a durable machine-readable code (e.g. QR code or barcode), provided that the identifier remains legible and attributable to the cookstove and is recorded in the identifier-management system required under paragraph 12(f).” Retain SUMs as an acceptable, but not mandatory, means of identification.
5	6. Demonstration of additionality	Paragraph 37(f)	The 4.5 per cent penetration threshold is too low to function as a hard eligibility condition for the simplified additionality pathway. The existence of some equivalent technologies in a market does not establish that further deployment would occur without carbon finance, particularly where affordability and credit constraints remain binding. Independent randomized evidence from cookstove adoption in Nairobi illustrates this point: households faced a USD 40 market price for an efficient charcoal stove but average willingness to pay was only USD 12. Access to short-term credit more than doubled willingness to pay but still did not close the price gap. Follow-up evidence shows persistent additionality of subsidies over 3.5 years. These results demonstrate that awareness and some existing adoption can coexist with substantial barriers to further adoption. See Berkouwer & Dean (2022), https://doi.org/10.1257/aer.20210766 ; Berkouwer & Dean (2026), https://doi.org/10.1142/S2010007826500089 .	Delete the 4.5 per cent threshold in paragraph 37(f) as a mandatory eligibility cut-off. The simplified pathway should instead require evidence that material barriers to autonomous adoption remain in the defined target population. If the MEP retains a numerical screen, it should operate as a trigger for further assessment rather than an automatic exclusion from the simplified pathway.

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6	6. Demonstration of additionality	Paragraph 37(g); Question 3	IETA does not recommend defining “low cost” through a fixed percentage of production cost. Production cost is not a stable or readily verifiable proxy for affordability and may vary with manufacturing scale, import duties, distribution, after-sales service, financing, warranties and local supply chains. It can also penalize commercial models that combine carbon finance with consumer finance or PAYGO structures. Real-world randomized evidence further shows that affordability constraints can remain severe even where an efficient stove delivers large private fuel savings: in Nairobi, a USD 40 stove reduced charcoal consumption by approximately 39 per cent, while average willingness to pay remained USD 12 and rose to USD 25 with short-term credit. See https://doi.org/10.1257/aer.20210766 .	Delete paragraph 37(g) as an eligibility condition. Do not prescribe a universal maximum end-user price as a percentage of production cost. Where affordability is relevant to the simplified pathway, allow activity participants to demonstrate that carbon finance materially reduces an identified affordability or financing barrier using transparent evidence such as prevailing retail prices, willingness-to-pay evidence, consumer financing terms, subsidy design, or other activity-specific market data.
7	6. Demonstration of additionality	Paragraph 40(d)	For the same reasons as for biomass cookstoves, a 4.5 per cent penetration threshold is not an appropriate universal indicator of autonomous adoption for LPG or electric cooking. Adoption of modern cooking technologies depends on context-specific constraints including appliance cost, fuel or electricity cost, reliability of supply, household liquidity, consumer finance and cooking preferences. A small existing stock of efficient technologies therefore does not demonstrate that the activity is non-additional. A hard threshold may also exclude low-income target populations located within broader markets where adoption is concentrated in higher-income households.	Delete the 4.5 per cent threshold in paragraph 40(d) as a mandatory eligibility cut-off. Require the simplified pathway to demonstrate that material barriers to autonomous adoption remain in the defined target population. If a numerical screen is retained, use it as a trigger for further evidence rather than an automatic exclusion.

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8	6. Demonstration of additionality	Paragraph 40(e); Question 4	A fixed requirement that LPG or electric devices be free or sold below a specified percentage of production cost is particularly difficult for modern-cooking business models. It is common practice for higher-cost appliance-plus-fuel packages to use PAYGO or other consumer-finance arrangements alongside carbon revenue. Production cost does not capture the financing terms, distribution costs, customer support or recurring energy costs that determine affordability. A fixed 50 per cent threshold could therefore exclude additional activities even where carbon finance is demonstrably necessary to make the household offer viable.	Delete paragraph 40(e) as a mandatory simplified-additionality criterion. Do not set a universal end-user price threshold as a percentage of production cost. Permit activity participants to demonstrate the role of Article 6.4 revenue in addressing the relevant affordability or financing barrier using transparent, auditable market evidence, including PAYGO terms where applicable.
9	6. Demonstration of additionality	Paragraphs 69–73; Question 5	IETA recommends avoiding a very low global common-practice threshold. Clean-cooking adoption is heterogeneous and non-linear across geographies and income groups, and reliable data on the thermal efficiency of all comparable household technologies are often unavailable. Member developers report that national fuel-use statistics frequently cannot establish the share of households using technologies with an efficiency equal to or higher than the project technology. Independent randomized evidence from Nairobi also shows that widespread awareness and commercial availability do not eliminate credit and affordability constraints. If the MEP requires a numerical threshold, member input converges around 25–30 per cent as a more workable range than a low single-digit threshold. IETA does not suggest that any one value is universally empirically optimal.	Prefer an activity-specific common-practice assessment based on the defined target market and the best available data. If the MEP retains standardized numerical thresholds, set an interim backstop of 30 per cent for both urban and non-urban households, with the ability to use a more representative activity-specific threshold where robust data justify it. Review the threshold after implementation data become available. Do not require thermal-efficiency market data that are not reasonably available; permit documented proxy evidence where necessary.

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10	7. Baseline scenario	Paragraphs 86–90; Table 3; Question 6	IETA supports retaining the flag concept as a review trigger: it focuses scrutiny on unusually high baseline-consumption values while still allowing robust project evidence to be considered. We also caution against further geographic disaggregation unless robust, representative datasets exist. Additional granularity can create false precision and data gaps, particularly in countries where household energy statistics are limited. The methodology should continue to give appropriate weight to representative KPT evidence and credible contextual explanations.	Retain the current flag mechanism and the present high-level rural versus urban/peri-urban structure in Table 3. Do not introduce additional mandatory geographic disaggregation unless supported by robust published datasets. Maintain paragraph 90 so that values above the flag may be accepted when supported by representative KPTs and credible contextual evidence, subject to the applicable cap. Revisit the numerical values as implementation evidence accumulates.
11	7. Baseline scenario	Paragraphs 125–138; Note 2	If an initial downward adjustment is retained, IETA supports Option 2, which focuses the uncertainty adjustment on baseline energy-consumption parameters. This is the component most directly affected by project measurement and, as the cover note notes, baseline energy use accounted for more than 80 per cent of variance in the referenced Monte Carlo analysis. Applying Option 1 across all contributing parameters risks layering uncertainty adjustments on parameters that are already set conservatively or addressed elsewhere in the methodology. Multiple member submissions support Option 2. The current text in paragraph 125 also refers to “baseline emissions from electricity generation”, which is inconsistent with a section that applies to the broader cooking-energy methodology.	Select Option 2 and delete Option 1. Limit the initial downward-adjustment uncertainty calculation to the baseline energy-consumption parameters specified in paragraphs 131–134. Correct paragraph 125 by replacing “baseline emissions from electricity generation” with “baseline emissions under this methodology” (or equivalent technology-neutral wording).

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12	7. Baseline scenario	Paragraph 139 (and paragraphs 140–141)	The fixed one-per-cent annual increase in the downward adjustment is not linked to an identified physical trend in household cooking emissions or to observed degradation in baseline accuracy. Actual changes in stove use, household participation and fuel consumption are already captured through recurring monitoring, surveys, KPTs and/or SUMs. The cumulative effect of the initial adjustment plus annual escalations can materially reduce credited emission reductions over a five-year period. Applying a mechanically increasing haircut in addition to activity monitoring and other conservative provisions risks compounding conservativeness without improving accuracy.	Delete paragraph 139 and remove INDA from the equations in paragraphs 140–141. Carry forward the initial downward adjustment without an automatic annual escalation, unless a future methodology revision establishes an evidence-based adjustment linked to an observable parameter.
13	8. Activity scenario	Paragraphs 169–172	The default adjustment in paragraph 172 is not supported by a sufficiently broad empirical evidence base to justify a universal 25 per cent reduction in estimated emission reductions for KPT-based activities. We note that there is only limited and conflicting evidence on changes in stove use during KPT observation, with the available studies covering a small number of stove models and locations. Furthermore, cooking-event frequency is not necessarily proportional to fuel consumption or emissions. Applying the same default across technologies and geographies therefore risks replacing measurement with an arbitrary conservativeness factor. The activity-specific SUM approach in paragraph 171 is preferable because it tests whether observed behaviour changed in the actual project sample.	Delete the default 75 per cent factor in paragraph 172. Where a Hawthorne-effect correction is required, use the activity-specific approach in paragraph 171 based on SUM observations around the KPT period. If the MEP retains a default during the transition period, it should be supported by a documented meta-analysis that demonstrates applicability across relevant technologies and geographies rather than by a single universal value.

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14	2. Definitions	2.2 Methodological terms and definitions / 16 Data and parameters monitored Paragraph 7(v); Data / Parameter table 24	A fixed minimum of five project-stove cooking events per week can exclude genuine adopters in contexts with low or seasonal cooking frequency. For example, a household conducting four of five weekly cooking events on the project stove would have 80 per cent project-stove use yet could fail the user-household definition. This is particularly relevant during lean seasons, travel or other temporary changes in household cooking. Lower usage and fuel savings are already reflected in KPT and usage monitoring; excluding the household entirely can therefore create an additional reduction unrelated to actual emission savings. The existing wording “on average ... during a given monitoring period” is helpful, but the fixed five-event floor remains unnecessary where actual use is measured.	Remove the fixed five-cooking-events-per-week threshold from paragraph 7(v) and Data / Parameter table 24. Define a user household as a participating household with a functioning project cookstove for which project-stove use is demonstrated during the monitoring period, and quantify emission reductions based on observed usage and fuel/energy consumption. If a minimum threshold is retained, specify that it is assessed as an average over the full monitoring period and must account for documented seasonal variation.
15	10. Non-permanence provisions	Paragraphs 183–184; Equation (59)	IETA does not support the application of non-permanence provisions to emission reductions associated with reduced biomass consumption under this methodology. As IETA noted in its comments on the parallel “Energy efficiency measures in household cooking” methodology, no forest or woodland carbon stock is credited by the cookstove activity. The durability and reversal risk of such stocks should therefore not determine the amount of emission reductions credited to the activity. Applying a 100-year reversal-risk assessment and a buffer pool contribution to cookstove activities would be conceptually inappropriate and would depart from long-standing practice under the CDM and voluntary carbon market.	Delete paragraphs 183–184 and Equation (59) and remove the requirement for emission reductions associated with reduced biomass consumption under this methodology to contribute A6.4ERs to the Reversal Risk Buffer Pool Account. If non-permanence provisions are nevertheless retained, IETA recommends, at a minimum, exempting activities in LDCs and SIDS.

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16	15. Data and parameter not monitored	Data / Parameter table 4 (fNRB)	IETA supports the use of standardized fNRB values under A6.4-AMT-009. However, standardized model inputs may not always reflect the best available national or subnational evidence. Consistent with IETA's broader position that standardized default or backstop values should not override more representative robust evidence, the methodology should allow improved local data to inform the MoFuSS inputs where the quality and relevance of those data can be demonstrated.	Allow revised national or subnational fNRB estimates generated using the approved MoFuSS framework where the revised inputs are demonstrably more representative and are supported by peer-reviewed research or independently verified field evidence. The revised inputs, supporting evidence and resulting fNRB estimate should be transparently documented and independently reviewed.
17	15. Data and parameter not monitored	Data / Parameter table 9; Appendix 10 (wood-to-charcoal evidence)	IETA reiterates its previous recommendation that activity participants should be able to deviate from standardized wood-to-charcoal conversion values where more representative regional or activity-specific values exist and are supported by peer-reviewed research or independently verified field evidence. In addition, the evidence considered in the present draft reports mean and median conversion efficiency values around 5.8:1 and an overall weighted average of 7.1:1 in recent field studies. On that basis, and taking into account member inputs received for this consultation, IETA supports revising the default value from 5:1 to 6:1.	Replace the 5:1 default wood-to-charcoal conversion value with 6:1. In addition, allow activity participants to use a regional or activity-specific value where it is demonstrably more representative and supported by peer-reviewed research or independently verified field evidence.
18	11. Emission reductions	Paragraph 187; Note 3	IETA is concerned about the cumulative application of conservative adjustments. In the parallel "Energy efficiency measures in household cooking" methodology, uncertainty is addressed at the methodology level through Monte Carlo analysis. Requiring an additional activity-level uncertainty analysis under paragraph 187 risks accounting more than once for uncertainties already addressed through conservative parameter values and other adjustments, and would create inconsistent treatment across the two clean cooking methodologies.	Align the treatment of uncertainty with the parallel "Energy efficiency measures in household cooking" methodology and address uncertainty at the methodology level. Individual activities should not be required to undertake an additional uncertainty analysis under paragraph 187 where the relevant uncertainties have already been addressed by the methodology. If paragraph 187 is retained, it should explicitly exclude uncertainty components already accounted for elsewhere.

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19	4. Applicability	4.1 Applicability conditions / 14 Monitoring requirements Paragraph 12(j); section 14.2.4 and Appendix 8	IETA supports the objective of improving monitoring accuracy through Stove Use Monitors (SUMs). However, making SUM-based monitoring mandatory from 1 January 2028 would not provide sufficient time for project developers and the wider market to adapt, particularly for large-scale and geographically dispersed programmes. Consistent with IETA's previous submission on the parallel clean cooking methodology, the mandatory requirement should be postponed to 1 January 2031 to allow sufficient time for market adaptation and implementation.	Replace 1 January 2028 with 1 January 2031 wherever it applies to the mandatory use of SUMs. Until that date, retain the monitoring approaches otherwise permitted by the methodology. Where SUMs are used, the methodology should continue to allow statistically representative sampling in accordance with the applicable sampling requirements, rather than requiring installation on every project cookstove unless expressly required for a specific monitoring purpose.
20	-	6 Demonstration of additionality / 7 Baseline scenario Paragraph 27; paragraph 85	Periodic review is appropriate, but a full re-demonstration of additionality at every crediting-period renewal can create material investment uncertainty for activities whose own deployment has changed market conditions. The draft already requires the regulatory analysis to be updated for each monitoring report and terminates crediting if a relevant legal requirement or qualifying public support becomes effective. These ongoing safeguards can address changes in regulatory surplus without requiring the original investment decision to be re-litigated in full. Likewise, frequent baseline re-identification should be predictable and aligned with the crediting-period framework.	Clarify that additionality is demonstrated at registration and that reassessment at crediting-period renewal focuses on continued regulatory surplus and other forward-looking eligibility conditions required by Article 6.4 rules, rather than retroactively re-testing the original investment decision. Align baseline re-identification with the crediting-period renewal cycle to the extent permitted by the applicable Article 6.4 standards, while preserving emission reductions validly verified under the preceding period.