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<i>Name of submitter</i>	Laurent Perrinjaquet
<i>Affiliated organization of submitter</i>	Laurent Perrinjaquet
<i>Email of submitter</i>	laurent.perrinjaquet@burnmfg.com
<i>Date of submission</i>	20/08/2026

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)
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1	5. Activity Boundary	Paras 22-23, pp. 28-29; para 37(c), p. 31; Data/Parameter table 4, p. 81	"fNRB The methodology permits only the sub-national, national or multi-national default values of the fNRB tool (A6.4-AMT-009), and places fNRB among the parameters not monitored (Data/Parameter table 4). We raise four points: (i) the MoFuSS tool is *still in development* with further research required, and it is highly likely that the science of estimating fNRB continues to improve over the lifetime of PACM and a project's crediting period. National governments are commissioning new fNRB studies - often using the MoFuSS tool, but inputting robust local data rather than outdated global averages. We believe fNRB should be a monitored parameter, and updated as more evidence becomes available (ii) fNRB is highly site-specific. As we submitted on A6.4-MEP013/014 and in the Project Developer Forum submission on fNRB, more precise estimates should be admissible where they are demonstrably conservative and rigorously validated. CLEAR, for example, permits customised project-area MoFuSS runs with validated inputs. Accuracy is the goal of the mechanism; a validated, more precise value serves it better than a coarser default. (iii) fNRB changes over time. Forest cover, wood demand and supply sheds evolve during a crediting period, and the parameter itself is defined per year (fNRB i,y). A value that changes over time should be treated as a monitored parameter and periodically re-determined - for example when the fNRB tool or its underlying datasets are updated, and at crediting-period renewal - rather than fixed for the duration. This also strengthens the environmental-integrity case for managing non-permanence through fNRB (see our comment on Section 10). (iv) The fuel-boundary provisions are difficult to apply as drafted. Para 22(a)(ii) allows a sub-national boundary for charcoal only where the specific source of the charcoal, and of the wood used to produce it, is known and lies within one jurisdiction. Informal charcoal supply chains make this extremely difficult to evidence, so the option risks being unusable. Para 37(c) requires, for a multi-national boundary, that the host Party 'and all neighbouring countries' import at least 50 per cent of their charcoal. This appears	(a) Allow, in addition to the fNRB tool defaults, project-specific fNRB determination using the MoFuSS model with a customised supply-shed and validated inputs, subject to conservativeness demonstration and DOE validation. (b) Treat fNRB as a monitored parameter: require its re-determination when the fNRB tool or underlying data are updated, and at each crediting-period renewal, applying the then-valid values to subsequent monitoring periods. (c) Amend para 22(a)(ii) to accept best-available evidence of predominant sourcing (market surveys, government or literature sources) rather than knowledge of the specific source. (d) Correct para 37(c) so the import condition applies to the host Party only, consistent with para 22(a)(i).
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			inconsistent with para 22(a)(i) and would be extremely difficult to demonstrate."	
2	4. Applicability	Paras 11-12, pp. 22-25; para 154, p. 60; cover note para 56, p. 14	"Applicability The monitored-energy pathways are limited to electricity [and LPG]. Processed-biomass and liquid-biofuel technologies (pellets, ethanol, biogas, bio-digesters) are excluded from this version, and metered or fuel-sales-based accounting for biomass fuels is reserved for a future version (para 154, footnote 42). We welcome the commitment in cover note para 56 to expand the methodology once the relevant tools are concluded. Our concern is the gap in the meantime. Proven clean-cooking business models - pellet gasifiers and ethanol stoves with exclusive fuel-supply chains and household-level sales records - would have no pathway under the mechanism, even though they are creditable today under CLEAR and under Gold Standard's metered methodology. Excluding them narrows the technology choices available to households without an integrity rationale: an exclusive supply chain with household-level sales records provides the same quality of consumption data for processed biomass as it does for LPG, which the draft already accepts."	Prioritise the expansion to pellets, ethanol, biogas and bio-digesters in the next revision cycle. In the interim, permit fuel-sales-record-based monitored energy consumption for processed biomass fuels with exclusive delivery systems and anti-diversion safeguards, mirroring the treatment the draft already provides for LPG in the corresponding parameter tables.

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3	3. Normative and informative references	Paras 9(g)-(i), p. 21	"Normative and informative references Core elements of the methodology depend on documents that are not yet approved: the Sampling and surveys tool (governing all surveys, KPTs and sampling plans), the Reversal risk assessment tool (governing buffer contributions), and the companion methodology A6.4-AMM-00X (governing the applicability boundary in para 11). All three are bracketed in para 9(g)-(i), with footnotes noting they are under development. As we observed on A6.4-MEP013/014, adopting a methodology that references unapproved instruments creates regulatory risk for early movers. Activities cannot assess their sampling burden, their buffer exposure, or in some cases their eligibility. Each subsequent tool approval may then trigger methodology revisions, compounding the uncertainty. Predictability of the regulatory framework is what allows investment to flow to activities; sequencing the approvals protects it. Please note that the UNFCCC consultation on tools 9.a-i happened over only 3 weeks in July (when much of the sector was out of office), and we believe have not yet been subjected to proper scrutiny or review"	Sequence adoption so that the Sampling and surveys tool and the Reversal risk assessment tool are approved, or published in stable draft, before or together with this methodology. Finalise the companion methodology A6.4-AMM-00X in the same Supervisory Body decision. Where that is not possible, include explicit transitional provisions guaranteeing that activities registered under this version are not retroactively affected by later tool changes within their crediting period.

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4	Appendix 2. Sample template...	Appendix 2 paras 5-6, p. 110; Appendix 5, pp. 115-123	"Carbon Waivers We support documented, informed household consent and the waiver-certificate concept. Two requirements, however, appear disproportionate at household scale. (i) The mandatory audio-recording and archiving of the verbal explanation for every certificate (Appendix 2 paras 5-6) creates significant data-management and privacy burdens across hundreds of thousands of households. We are not aware of a comparable standard that requires this for all attestations; Gold Standard, for example, accepts signed forms, transactional records, or verifiable digital or audio confirmations as equivalent evidence, which we consider a more proportionate approach with the same evidentiary value. (ii) Collecting national identification numbers raises data-protection exposure under host-country privacy laws and GDPR-equivalent regimes, particularly where certificates must be made available to DOEs and retained for the crediting period. Traceability, not identity documentation, is what verification requires."	Make the audio recording one acceptable evidentiary option among equivalents (signed form, witnessed thumbprint, verifiable digital acceptance), required only where the signatory cannot read or write. Make the national ID field optional where another unique identifier (stove serial number plus household record) ensures traceability. Align data-handling requirements with host-country data-protection law: village or ward-level location descriptors in public documentation, with full records retained for DOE review.

5	Cover note	Various (listed in comment)	"Editorial In the course of our review we noted a number of apparent cross-referencing and drafting inconsistencies. We list them here to support the editorial quality-assurance process, as they would create interpretation questions at validation if carried into the final version. Examples: the parameter PCE_KPT in equation (55) is defined as 'Average Energy efficiency measures in household cooking', which appears to be a copy-paste error; cover note para 38 refers to a 75 per cent cap while para 114 sets survey caps at 90/58 per cent for a different parameter; paras 121-123 appear to mix subscripts i and j and reference equation (20) for a parameter defined in equation (22); paras 148 and 198 state the missing-data rule with inverted conditions ('more than half' versus 'less than half'); para 38 directs activities failing 'the conditions in paragraph 34' to the comprehensive route, while para 41 references 'paragraph 37' after the electric/LPG conditions of para 40 - both cross-references appear shifted (para 38 should reference 37, and para 41 should reference 40); references to Appendix 5 and Appendix 9 appear interchanged in several parameter tables; a non-existent 'Appendix 11' is referenced in Data/Parameter table 7; the paragraph numbering cited in para 14(a) does not appear to match the referenced provisions; and the cover note's section 7 paragraph numbering diverges from the body. NCV source references also alternate between 'Appendix 4' and 'Appendix 5'. Separately on terminology: the draft replaces the established CTEC / non-CTEC terms of the source methodology with 'monitored energy consumption' and 'sampling-based energy consumption'. We suggest retaining the established terminology. It is already used across existing programme documentation, training materials and literature, and continuity would avoid interpretation errors during the transition."	Undertake a full editorial and cross-reference QA pass and publish a corrected version. Given the number of substantive open brackets and questions, conduct a second round of public consultation on the revised draft before recommending it to the Supervisory Body.
6	4. Applicability	Para 12(e), read with para 12(f), p. 24	About the requirement for a "permanent unique identifier affixed to the cookstove". All our stoves have a metal QR code attached to them that is directly link to a specific household and we think the intention is to have it permanent but we have to be realistic and recognise that it can	Amend the introductory words of paragraph 12(e) so that the listed means are not exhaustive. Keep the requirement at a achievable by requiring any means that to a reasonable endeavour achieves permanent, unique and auditable identification of the

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			be removed if somebody really want to remove it and the stove will still be usable for cooking. Despite we understand the good intention behind this requirement, we think it is too strict and put some stove at risk of being declared to eligible for the wrong reason.	cookstove and its linkage to a single household.
7	10. Non-permanence provisions	Appendix 10 paras 30-31, pp. 152-153	The methodology requires decentralised cookstove activities to run a 100-year reversal-risk assessment and contribute A6.4ERs to the buffer pool. Its own paras 30-31 confirm all three A6.4-STAN-METH-007 para 13 exemption conditions are met: participants do not control the reservoir, it is geographically separate, and changes cannot be attributed to the activity. A demand-side efficiency activity avoids a combustion flux, it does not sequester carbon in a reversible stock. fNRB already discounts credited reductions for the non-renewable share, so a buffer on top double-discounts the same risk. If the methodology's own analysis satisfies the exemption conditions, the conclusion should be exemption.	Fully exempt fNRB-based demand-side cookstove activities from the buffer-pool contribution, not just from ex-post monitoring. Recognise fNRB as the complete instrument for forest-carbon risk, updated at each crediting-period renewal. If any residual buffer is retained, cap it so it is not additive to fNRB on the same tonnes.
8	4. Applicability	General	The methodology excludes any option to develop an Art6.4 activity in an institution. Knowing the strong engagement from government on this topic, the important financial potential to transition institution like schools and the impacts of such project we think it is essential to integrate institution in the scope if the methodology. We see a strong risk to loose the current momentum of project development in this area if it's kept out of this methodology scope.	Include a path to develop Art6.4 activity in institution like hospitals, schools, churches or prisons (non-exhaustive list)