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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	-	The methodology relies on several tools that are still under development, including the Sampling and Surveys Tool and Reversal Risk Assessment Tool.	Prioritise their inclusion in the next revision. In the interim, consider allowing robust fuel-sales-based monitoring for processed biomass where exclusive supply chains and anti-diversion controls provide reliable consumption data

2	4. Applicability	Paragraphs 11–12 pp. 22–24	Paragraphs 11(a)(iii) and 11(b)(ii) confine the fuelwood and artisanal charcoal pathways to areas that do not otherwise fulfil the applicability conditions of paragraphs 12 to 13(f) of A6.4-MEP014-A04. The referenced range commences at paragraph 12 and therefore excludes paragraph 11(c) of that methodology, which confines its application to rural areas. The conditions actually tested concern baseline fuel, fuel stability, the artisanal character of charcoal production, poverty level and suitability to cooking needs. None distinguishes an urban household from a rural one. An urban household below the applicable poverty threshold cooking predominantly on artisanal charcoal accordingly satisfies paragraphs 12 to 13(f), is excluded from this mechanism methodology, and remains outside the scope of A6.4-MEP014-A04 by operation of its paragraph 11(c). No mechanism methodology is available to such an activity. Paragraph 11(b)(i) of this draft expressly contemplates urban areas, which indicates that the exclusion is unintended. Separately, where an activity does qualify under both mechanism methodologies, it is given no election between them. The two differ materially in baseline construction: this mechanism methodology quantifies the baseline from measured consumption, whereas A6.4-MEP014-A04 applies an ambitious benchmark constructed from standardised assumptions. Paragraph 63 of A6.4-STAN-METH-004 further provides that no downward adjustment applies in the first crediting year to benchmark-based baselines, so the choice of instrument carries a direct quantified consequence. The rural electrification/LPG thresholds at paragraph 11(a)(ii) may not accurately reflect actual household access to electric or LPG cooking. Electrification does not necessarily mean that households have sufficient capacity or affordability to cook electrically, while LPG availability does not necessarily translate into regular LPG use. The requirement for permanent identifiers at paragraph 12(e) is unnecessarily prescriptive. Mandating specific forms of identification, including SUMs on every credited stove, may create substantial cost	Amend paragraphs 11(a)(iii) and 11(b)(ii) to refer to the applicability conditions of A6.4-MEP014-A04 in full, so that failure of any such condition renders this mechanism methodology available. Permit an activity qualifying under both mechanism methodologies to apply either, subject to justification and consistent application throughout the crediting period. Remove or reconsider the electrification and LPG thresholds at paragraph 11(a)(ii). For identification, adopt an outcome-based requirement at paragraph 12(e) allowing any durable, unique and traceable identifier, including engraved/stamped/moulded serial numbers or durable QR/barcodes, provided the identifier is recorded in the required management system.
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			and implementation barriers at programme scale.	
3	7. Baseline scenario	Question 6, paragraphs 86 to 90 and Table 3 p. 41	The caps and flags bind baseline energy consumption only. Activity energy consumption is measured under section 8 and is subject to no equivalent constraint. Paragraph 90 provides that where justification for exceeding a flag is not accepted, the value is capped to the flag rather than to the cap, so the flag operates as the effective ceiling. Because the constraint applies to one side of a difference, its effect on credited emission reductions is levered. For an activity achieving a [45] per cent reduction in fuel consumption, capping a measured baseline of [1.4] tonnes of fuelwood per person-year to the rural flag reduces credited emission reductions to approximately [8] per cent of the measured margin under Option 2 at paragraph 137, and produces negative emission reductions under Option 1, notwithstanding a genuine reduction in household fuel use. Members further note that Table 3 expresses caps and flags in the same defined term as the standardised value for useful energy delivered in A6.4-MEP014-A04. The rural flag of 0.0023 and cap of 0.0047 TJ per person-year stand against a standardised value of 0.001277 for fuelwood; the urban flag of 0.0015 and cap of 0.00295 against 0.001095 for charcoal. Table 3 is derived from the KPT studies listed in Appendix 10, section 2. Members support retaining flags. The examples of justification at paragraph 89 are of different character: the use of plancha cookstoves is a technology consideration, whereas relative abundance of wood is a resource consideration already addressed through the fraction of non-renewable biomass.	Retain flags as triggers for justification rather than as default ceilings. Amend paragraph 90 so that a flag value is applied only after testing against measured activity consumption, so that no activity is driven to negative emission reductions by a data quality presumption. Alternatively, apply caps and flags symmetrically to baseline and activity energy consumption. Reconcile Table 3 with the standardised value applied in A6.4-MEP014-A04

4	7. Baseline scenario	Note 2, paragraph 125 p. 52	The two options differ in one respect only. Expressed as the maximum of two adjustments under Option 1, or the minimum of two baselines under Option 2, the calculations are algebraically equivalent, and both reproduce the minimum downward adjustment set out in equation (2) of A6.4-STAN-METH-004. The substantive difference is the scope of uncertainty considered. Option 1 is bound by paragraph 64(a)(i) of that standard to all causes of uncertainty identified in Appendix 1, section 4, paragraph 13. Option 2 confines the assessment to uncertainty in baseline energy consumption. Option 2 is properly grounded in the standard. Paragraph 64(b) permits an alternative approach provided the minimum downward adjustment is considered, and paragraph 137 of the draft does so. The evidential basis is the Panel's own: the uncertainty analysis undertaken for A6.4-MEP014-A04 identified baseline energy consumption as the dominant contributor to variance in emission reductions. Limiting the uncertainty term to that parameter therefore captures the material uncertainty without importing parameters whose contribution is immaterial. Option 1 would also result in the same uncertainty being deducted twice. The fraction of user households is already taken at the lower bound of the 95/10 confidence interval under paragraph 114, and again under paragraph 119 where sensor-based monitoring is applied. Paragraph 127 would require that same sampling uncertainty to be reflected a further time within DA_initial,UNC. The choice between the options is material rather than technical. Because the downward adjustment applies to baseline emissions while activity emissions are separately measured, its effect on credited emission reductions is levered by a factor of approximately [2.2] for an activity achieving a [45] per cent reduction in fuel consumption. On a representative case, credited emission reductions fall from approximately [44] per cent of the measured margin under Option 2 to approximately [29] per cent under Option 1.	Adopt Option 2, retaining the minimum downward adjustment at paragraph 137 as the floor.
5		Paragraph 182 -184 p. 69	fNRB-based clean cooking activities should not be subject to an additional reversal-risk buffer where the activity does not control the	A reversal buffer should not be applied to a carbon reservoir that the activity neither controls nor claims to have enhanced,

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	10. Non-permanence provisions		relevant carbon reservoir and does not cause or increase the risk of carbon-stock loss. The methodology itself recognises that activity participants do not control the relevant reservoirs, have no incentive to increase reversal risk, and that the reservoirs are geographically distinct from the cookstove activity. Carbon-stock losses would instead increase the non-renewable fraction of biomass and therefore make subsequent fNRB-based emission reductions more conservative. Members further note that the reversal risk treatment is not among the matters on which input is sought, notwithstanding that materially identical provisions appear in A6.4-MEP014-A04 and were the subject of stakeholder comment on that draft.	particularly where the existing fNRB mechanism already captures the relevant risk conservatively. Exempt fNRB-based clean cooking activities from the reversal-risk buffer contribution, not merely from ex-post reversal monitoring. The periodic updating of fNRB should be recognised as the appropriate mechanism for capturing changes in biomass renewability and associated carbon-stock conditions.
6	12. Avoidance of double counting	-	The current approach appears to place the correction on the measured cookstove activity, even where the water activity is based on an assumed baseline.	Where overlap occurs, adjust the assumed water baseline rather than deducting measured cookstove emission reductions. Retain household waiver certificates as the principal safeguard
7	14. Monitoring requirements	Data/Parameter Tables 4 and 9 pp. 81 and 85	fNRB – Table 4: The default fNRB model inputs may not adequately reflect local conditions in all project contexts. Project developers may have project-specific or local evidence that provides a more representative basis for determining fNRB. Wood-to-charcoal conversion – Table 9: The proposed 5:1 wood-to-charcoal conversion factor may not adequately reflect actual conversion ratios. Available evidence points towards higher conversion factors, including a weighted average of approximately 7:1, while higher factors may apply when the wider charcoal supply chain is considered.	Monitoring parameters should reflect the best available evidence and, where appropriate, allow robust local evidence to improve accuracy while retaining an appropriately conservative approach. fNRB – Table 4: Allow MoFuSS-derived, project-specific fNRB values where local evidence demonstrates that the default model inputs do not adequately reflect conditions on the ground. Such values should be supported by appropriate quality and relevance checks on the underlying data. Wood-to-charcoal conversion – Table 9: Adopt a 6:1 wood-to-charcoal conversion factor rather than 5:1. This would remain conservative while better reflecting available evidence and is consistent with the previous IPCC value.

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8	16. Data and parameter monitored	Data/Parameter Table 24 p. 95	The requirement for a household to use the project stove at least five times per week may not reflect actual cooking patterns, particularly during seasonal periods of food scarcity or lower cooking frequency. KPT sampling already captures households with lower or occasional use, meaning the proposed threshold may effectively introduce an additional reduction in both usage and fuel savings.	Monitoring requirements should reflect real-world household behaviour rather than impose an artificial usage threshold that may disproportionately penalise projects serving vulnerable or seasonal-use populations. Reduce the minimum usage threshold from five times per week to once per week.
9	Appendix 2. Sample template...	Paragraphs 2–7 p. 110	The requirement to audio-record a verbal explanation of the certificate and its implications for every household creates a significant implementation burden, particularly at programme scale, without clear evidence that this additional requirement materially improves integrity. The requirement for national identification may also create barriers for marginalised households that lack formal identification documents. Members also raise concerns about mandatory collection of national identification numbers, particularly under host-country data-protection requirements.	Household protection and informed consent should remain fundamental, but requirements should be proportionate and practical for large-scale implementation. Make audio recording one acceptable form of evidence, rather than a mandatory requirement in every case. Alternative evidence could include signed forms, witnessed confirmation or verifiable digital acceptance. Make national ID optional where another unique identifier – such as stove serial number linked to a household record – provides sufficient traceability. Similarly, avoid making possession of a national ID an absolute prerequisite where alternative appropriate means of establishing identity and consent are available.
10	1. Introduction	-	Members identified numerous apparent drafting and cross-reference inconsistencies, including equation references, appendix references, missing-data provisions, paragraph cross-references and terminology.	Conduct a full editorial and cross-reference QA before finalisation and consider a second consultation on a corrected draft given the number of substantive unresolved issues.

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11	6. Demonstration of additionality	Section 6.3.3, Paragraphs 69-72	A common practice threshold of 4.5% is inconsistent with the objective of universal access to clean cooking under SDG7 and would exclude from crediting many areas in which access remains substantially incomplete. The threshold is also impractical to apply. Activity participants would be required to establish the thermal efficiency of cookstoves in comparable households. National statistics on fuel use are variable are available in some host Parties but are not disaggregated by income and do not support an assessment at that level of specificity.	Where a common practice threshold is retained, adopt a value in the range of 25%-30% consistent with the approach taken in comparable standards and specify sources of evidence that can realistically be obtained at activity level.