



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	6. Demonstration of additionality	6.2.1.37 (f)	We'd like to clarify how "target population" is scoped for the purposes of the 4.5% threshold in this paragraph - specifically: "the proportion of households within the target population that have a functioning cooking technology." When a project calculates this proportion via household sampling to compare against the 4.5% threshold, should the sample be drawn from the overall population (national or regional level), or from a specific, identified population facing particular access barriers? If the former, the 4.5 threshold appears low relative to typical market evidence: ESMAP's State of the Global Clean and Improved Cooking Sector reports improved-biomass-cookstove penetration among solid fuel users of roughly 11-21% across Sub-Saharan Africa, South Asia, and Southeast Asia (closer to 20% than the figure implied here). If the households sampled for distribution are already a specifically targeted population (e.g., one facing distribution or affordability barriers), the 4.5% threshold sounds appropriate, and we'd appreciate that being made explicit in the text.	-

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2	4. Applicability	4.1.11 (a)	We'd like to understand the rationale for excluding same-fuel efficiency pathways that qualify under Track 1 from also being eligible under Track 2. We recognise this exclusivity likely reflects a legitimate concern about double-counting or methodology-shopping between the two tracks, and would welcome clarification on that point specifically. That said, we appreciate the rigour of the Track 2 methodology, and we believe Track 2 should be open to all same-fuel pathways currently redirected to Track 1, rather than redirected by default.	-
3	7. Baseline scenario	7.5.1.125 Note 2	We view the introduction of adjustments based on error propagation and uncertainty bounds into the crediting calculation positively, under either option. Option 1's inclusion of the full extent of uncertainty parameters aligns with best-in-class practice elsewhere - for example, Isometric's Standard (v2.1), which requires projects to quantify uncertainty across all parameters used in the emissions calculation, supported by a sensitivity analysis that directs additional scrutiny toward the most influential parameters rather than excluding less influential ones from consideration. That said, we recognise Option 2 may be more verifiable in practice. If Option 2 is adopted, we would recommend requiring a sensitivity analysis demonstrating that the excluded sources of uncertainty (e.g., fNRB, emission factors, baseline scenario assumptions) are genuinely immaterial, rather than assuming this to be the case.	-

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4	10. Non-permanence provisions	10.2	We agree that non-permanence risk is an important consideration for methodologies, but acknowledge the current challenges in assessing and mitigating this risk at the project level. We therefore believe this should remain an open issue, to be revisited as the science on how to quantify it at the project level develops. A key area to monitor is the development of methods for assessing causal relationships between above-ground biomass (AGB) dynamics, project activities, and reversal events - this is where we see the clearest need for scientific advancement.	-
5	6. Demonstration of additionality	6.2.2	We agree that including LPG within the methodology, subject to appropriate safeguards, is a sensible approach. Without safeguards, LPG inclusion could risk delaying electrification; however, we recognise this is a pragmatic option where grid connection is not a near-term prospect.	-
6	15. Data and parameter not monitored	214. Data / Parameter table 9.	We believe the 5:1 ratio for artisanal charcoal is conservative, and would be in favour of increasing this to 6:1 - still conservative relative to the approximately 9:1 mass ratio reported for traditional kilns by Hoffmann et al. (2018, Food Security), who found an 11.1% wood-to-charcoal conversion efficiency in Tanzania. This supports the methodology's own acknowledgment that field-measured ratios exceed the current 5:1 default.	-
7	6. Demonstration of additionality	6.2.1.37 (d) (e) (f) (g)	We support the continued use of Option 1 (simplified demonstration of additionality) when these conditions are met. We view these criteria as quantitative, traceable, and grounded in peer-reviewed literature, which we believe strengthens the credibility of additionality claims for LDCs and SIDS. We would not support further loosening these criteria in these cases.	-

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8	6. Demonstration of additionality	6.3.2 para 49	The current safeguards under Option 1 help ensure that free cookstove distribution is paired with consideration of socio-economic context. Under Option 2, we'd like to raise an additional consideration for areas where energy markets may already exist (e.g., peri-urban areas): alongside investment analysis, we'd suggest requiring evidence of willingness-to-pay or existing consumer market dynamics, to demonstrate genuine uplift in penetration for the target population. Investment analysis alone risks allowing projects that distribute cookstoves for free or at a subsidy to demonstrate a financial loss, without necessarily showing that this translates into real additional uptake beyond what the existing market would have delivered.	-
9	4. Applicability	4.1.12 (j)	On the 1 January 2028 transition date for mandatory Stove Use Monitors (SUMs): we support further evidence-gathering and stakeholder consultation to confirm this timeline is operationally feasible, particularly for large or logistically complex countries. We'd also note a trade-off worth exploring: without SUMs, achieving robust usage monitoring may require more frequent field campaigns, which carries its own operational burden; but mandating SUMs before the market can support them may introduce its own implementation risk. We'd welcome the MEP's view on whether the current timeline strikes the right balance, or whether a phased or delayed approach would be preferable.	-