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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	2. Definitions	Question 1	Gasifier stoves should be included in this methodology for cooking transitions. These devices are much cleaner burning and provide a practical, lower cost alternative interim step on the transition to clean fuels like LPG and electricity. Potential safety concerns around proper maintenance etc. can be alleviated / safeguarded by extensive training sensitisation meetings and follow up monitoring campaigns. Which is central to successful carbon projects in any case. Furthermore, including LPG stoves pose much more of a safety risk as improper handling of the burner and cylinder could yield disastrous outcomes. However, proper training and follow-up with participants safeguards against situations like this.	Include gasifier stoves into the scope of the methodology.

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2	4. Applicability	Section 4.1.11 (d)	It is very important to distinguish between access to electricity and actual usage thereof for cooking / thermal applications. For example, according to World Bank data, South Africa had a 90.2% electrification rate in 2024 (https://data.worldbank.org/indicator/EG.EL.C.ACCS.ZS?locations=ZA). However, many households cannot afford the cost of electricity and uses it very sparingly. As a result, many low-income households still rely on solid and more polluting fuels for thermal applications rather than electricity. Therefore, the presence or access to electricity infrastructure does not necessarily imply that households are using it for cooking. Thus, it should be left to the baseline setting to determine in the region / households if electricity is used for cooking rather than placing a blanket exclusion on an activity type due to "access" to something.	Baselines should determine the applicability of implementing the project rather than blanket exclusions based on reported access rates.
3	7. Baseline scenario	Par 78	It states that results from the pre project survey is to be compared against recent and appropriate information from national or regional representative surveys or reputable literature. How would cases be handled if there are no appropriate surveys or literature to conduct the cross-check with?	-
4	Cover note	Par 47	The mechanism methodology states that fNRB values shall be obtained from the A6.4-AMT-009 tool. This limits the methodology to only use the default factors available in the tool and not any other tools/methods as and when they become available.	We request that this is expanded to include other tools and methods for calculating fNRB as and when they become available and approved by the MP and SB.
5	15. Data and parameter not monitored	Table 4	fNRB should be a monitored parameter to be updated at the discretion of the developer. This allows for more accurate values to be applied as tools for calculating fNRB are refined and new tools become available.	Move fNRB into section 16 "Data and parameters monitored"

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6	4. Applicability	Question 2	We support the inclusion of LPG into the scope of the methodology and believe the lock-in measures are appropriate.	-
7	8. Activity scenario	par 169-172	The methodology proposes a 75% default for HE_ind (equivalent to a 25% discount on fuel savings). We have substantive concerns with the magnitude and the asymmetry of this provision. The 75% factor is not supported by the literature cited in the methodology. In particular, findings from a 2013 study by Berkeley Air Monitoring Group, recently re-analysed (BAMG 2025), did not find evidence of a strong Hawthorne effect for cookstove KPTs. The methodology should ground the proposed factor in current empirical evidence rather than older default assumptions.	Adopt a default HE_ind = 90% (10% discount), consistent with the most recent empirical re-analysis of Hawthorne effects in cookstove KPTs (BAMG 2025, building on Bensch & Peters 2013) and with what parallel methodologies have adopted on the same evidence base, until more current empirical evidence supports a different value. We strongly advocate this approach pending an evidence-collection phase during which projects using modern dMRV report actual cooking patterns before and during KPTs. Allow developers to demonstrate HE_ind > 90% with project-specific SUMs data showing that cooking patterns during the KPT period are statistically indistinguishable from non-KPT periods.
8	10. Non-permanence provisions	Par 183 - 184	Permanence provisions are not relevant to improved and clean cooking projects as the projects have no control over the standing biomass reservoirs. Also, these projects do not claim for increases or decreases in biomass reservoirs and also do not monitor these reservoirs. Thus, buffer pools should also not be considered in these project types as there can be no reversals of emission reductions.	Remove the need for buffer pool contributions as it is not relevant to this project type.