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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	11 A (i)	Insert a definition of 'non-urban area' in the Definitions section, to apply by default where no national or sub-national classification exists (e.g. based on population density or the UN Degree of Urbanisation methodology).	Paragraph 11(a)(i) defers to national/sub-national classification, but many host countries — particularly LDCs — have no codified urban/rural classification, or apply inconsistent thresholds across ministries. Without a fallback definition, eligibility screening becomes subjective and unverifiable at validation.
2	4. Applicability	12 (i)	In the case of electric cookstoves, activity participants should select project cookstoves with the highest nationally available efficiency rating. Where no national efficiency rating scheme exists for electric cookstoves, require selection of a device meeting a defined minimum energy efficiency class, rather than an undefined 'highest nationally available' rating.	Paragraph 12(i) ties selection to the 'highest nationally available efficiency rating,' but most Sub-Saharan African markets have no national electric appliance rating scheme, leaving the requirement without an objective benchmark to test against at validation. Unlike biomass and LPG cookstoves, which are already anchored to ISO 19867-1:2018 testing under paragraph 12(h), electric cookstoves have no equivalent fallback standard in the draft. A defined minimum efficiency class under an existing appliance testing standard would close this gap and give DOEs an auditable basis for compliance.
3	6. Demonstration of additionality	32	Activity participants shall update the regulatory analysis for each monitoring report. Fix the regulatory analysis at validation for the full crediting period, to be updated only renewal of crediting period	Investment/regulatory analysis is an ex-ante additionality test tied to the original investment decision. Re-running it at each monitoring report will introduce revenue uncertainty that deters investment.

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4	6. Demonstration of additionality	33	"(a) A relevant legal requirement becomes effective that directly or indirectly requires the installation of efficient cooking devices within the geographical boundary of the Article 6.4 activity where the project cookstoves are distributed; or (b) A relevant public sector finance becomes effective, unless the activity participants apply the Investment Analysis as per section 6.3.2 below ex-post and demonstrate that the public support is insufficient to render the activity financially viable and that the Article 6.4 activity would not be implemented in the absence of additional carbon finance." Add a grandfathering clause under paragraph 33 allowing ER claims to continue for the remainder of the crediting period for cookstoves already distributed before a new legal requirement or public finance measure takes effect.	As drafted, a change in law can terminate crediting prospectively without distinguishing stoves already distributed and generating verified reductions from those not yet deployed. This exposes activity participants to stranded-asset risk they could not have priced at the investment decision, and is particularly disruptive to local employment in LDC/SIDS clean cooking value chains.

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5	6. Demonstration of additionality	37 (f)	Prior to the implementation of the Article 6.4 activity, the proportion of households within the target population that have a functioning cooking technology with the same or higher thermal efficiency than the project cookstoves shall be 4.5 per cent or less, as determined in accordance with the methods in section 7.4.1; and Revise the 4.5 per cent threshold in paragraph 37(f) to 30–40 per cent, or publish the technical/statistical basis and sensitivity analysis behind the current figure.	No empirical basis for the 4.5 per cent threshold is disclosed in the draft or cover note. At this level, the criterion excludes target populations where even modest penetration of intermediate-efficiency stoves has already occurred, which is common in transitional markets — making the threshold appear arbitrary rather than conservative. Furthermore, this penetration figure will, in practice, not be verifiable for most host countries, as nationally representative data on the proportion of households already owning a functioning cooking technology of comparable or higher efficiency is not routinely collected or available, particularly in LDC and rural contexts; activity participants and DOEs would therefore have no credible dataset against which to test or validate compliance with this threshold. By excluding such populations from eligibility, the threshold effectively withdraws access to Article 6.4-financed clean cooking services from LDC populations who have made only partial progress towards cleaner cooking, undermining the basic right of these populations to progressively access modern, clean cooking energy under SDG 7 (Affordable and Clean Energy) and its target of universal access to clean cooking by 2030. A threshold this restrictive risks penalizing early, incomplete transition efforts rather than supporting their completion, contrary to the just and inclusive energy transition objectives underpinning both SDG 7 and the Article 6.4 mechanism.
6	6. Demonstration of additionality	37 (g)	Project cookstoves shall be provided to households [free of charge or may be sold to end users or] for a fee that does not exceed [50 per cent] [XX per cent] of the production cost[24]. Compliance with this requirement shall be assessed at each verification. Delete paragraph 37(g), — the MEP itself has flagged this threshold as unresolved in the accompanying Question 3.	This duplicates the additionality safeguards already tested under sections 6.1–6.3. ‘Production cost’ is not a standard, auditable MRV parameter, especially through informal or subsidised distribution channels, so the cap adds validation risk without a corresponding integrity benefit. The MEP’s own Question 3 confirms the threshold and its rationale are not yet settled.

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7	7. Baseline scenario	78	"The findings of the pre-activity survey shall be cross-checked against recent, appropriate (i.e., geographically and demographically comparable) information from nationally or regionally representative surveys or reputable literature, as follows:32 (a)Where, for parameters listed in paragraph 76(a), the discrepancy between the pre-activity survey findings and the cross-check data is no more than 10 per cent, the findings of the pre-activity survey shall be used; (b)Where, for parameters listed in paragraph 76 the discrepancy between the pre-activity survey findings and the cross-check data is more than 10 per cent, the following shall apply: (i)The value supported by the strongest evidence base and of greatest relevance to the geographic area of the Article 6.4 activity shall be selected and justified;33 and (ii)Where it is not possible to determine which value is supported by the strongest evidence base and is of greatest relevance to the geographical area of the Article 6.4 activity, the more conservative value from either the pre-activity survey or the cross-check data shall be used." Raise the discrepancy threshold in paragraph 78 from 10 to at least 30 per cent before reconciliation is mandatory, or remove the cross-check where no genuinely comparable national/regional survey exists.	National surveys are designed for macro-level policy purposes and do not capture localized project-boundary conditions. A 10 per cent tolerance does not allow for legitimate variance between project-level primary data and national aggregates, and would routinely override statistically valid project data with less granular figures — undermining the accuracy objective the check is meant to serve.
8	7. Baseline scenario	89	Table 3. Summary of the baseline caps and flags - Charcoal flag and cap values to be provided for the rural as well Add a charcoal-specific baseline cap and flag value for rural users in Table 3, alongside the existing fuelwood (rural) and charcoal (urban/peri-urban) rows.	Table 3 sets caps in tonnes of fuelwood energy per person-year for rural users and tonnes of charcoal energy per person-year for urban/peri-urban users only — there is no charcoal cap for rural users. Yet paragraph 11(b) explicitly permits charcoal cookstove activities 'in urban or non-urban areas' without restriction, so rural charcoal-based activities currently have no applicable baseline cap under Table 3. This appears to be a drafting gap rather than a deliberate exclusion.

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9	7. Baseline scenario	118	Option 2 (mandatory from 01 January 2028)The parameter representing the percentage of activity households with cookstoves that qualify as user households (Ψ_y) shall be estimated through measurements using SUMs, which may be conducted on a sampling basis. Retain SUMs as the default, MEP-recommended method for estimating Ψ_y under Option 2 from 1 January 2028, but permit continued use of the survey-based caps (paragraph 29) beyond that date wherein activity participants the SUM deployment is not commercially viable for the scale of the project, anyways to mitigate the over crediting risks the applicable Hawthorne effect discount will be applied to survey-based monitoring	The cover note explains that the 2028 SUM mandate responds to well-founded accuracy criticisms of survey-based approaches — a sound rationale we do not dispute in principle. A blanket mandate, however, does not account for field conditions where SUM deployment, connectivity and maintenance costs are disproportionate to activity scale, particularly for smaller PoA component projects in remote areas. The application default Hawthorne for the projects use survey based monitoring will give a better optionality on the economics.
10	8. Activity scenario	172	Otherwise, activity emissions shall be adjusted to account for the Hawthorne Effect, such that, in equation (55), HE_{ind} shall equal 75 per cent. ⁴⁴ The default Hawthorne Effect adjustment is valid through 31 December 2027. Replace the flat 75 per cent conservative cap under paragraph 38(a) with a phased, vintage-based default Hawthorne effect adjustment factor aligned with Gold Standard's RECH v5.0 (Table 9, section 10.1.2.3): 90 per cent for 2026–2027 vintages, 85 per cent for 2028–2029 vintages, and 75 per cent only for 2030 and later vintages.	MEP015 applies a flat 75 per cent cap on credited emission reductions irrespective of vintage year. By contrast, RECH v5.0 — a comparable, previously reviewed methodology — applies a phased schedule starting at 90 per cent for 2026–2027 vintages and reaching 75 per cent only for 2030 and later vintages, with further tightening contingent on a scheduled Secretariat evidence review in June 2027. Applying RECH's most conservative, final-phase figure from the very first crediting year, with no phase-in and no cited empirical basis, unnecessarily discounts credited emission reductions for early-vintage activities and is inconsistent with the phased, evidence-based approach RECH itself adopted for the same parameter.

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11	10. Non-permanence provisions	182 to 184	Non-permanence provisions Delete Section 10 (Non-permanence provisions) in its entirety, together with the associated Reversal Risk Buffer Pool Account deductions under Section 11, as non-applicable to cooking energy transition activities.	Non-permanence and reversal risk provisions are designed for removal activities, where a physical carbon stock is created and could later be released back to the atmosphere. Cooking energy transition activities generate emission reductions from avoided fuel combustion: once a cooking event occurs using the project cookstove rather than the baseline technology, the associated emission reduction has already happened and is not capable of being subsequently reversed. Imposing a buffer pool deduction on emission reductions that are complete at the point of generation has no technical basis and unnecessarily reduces the volume of A6.4ERs available to activity participants, undermining the financial viability of activities serving LDC and other low-income populations.
12	12. Avoidance of double counting	189	Requirements for the avoidance of double counting with Jurisdictional REDD+ Programs Specify in Section 12 a defined, proportionate evidentiary standard (e.g. based on publicly available REDD+ programme boundary data) by which activity participants can demonstrate non-overlap with a jurisdictional REDD+ programme, given that project developers typically have no direct access to jurisdictional REDD+ reference levels or accounting data.	The cover note confirms this safeguard is already scoped to fuelwood- and charcoal-related crediting activities rather than a generic cross-sectoral requirement, which is appropriate given the shared biomass reservoir. However, the operative text does not specify what evidence is sufficient to demonstrate non-overlap, and cookstove developers do not routinely have access to jurisdictional REDD+ MRV data. A defined, proportionate screening test would make this safeguard operable rather than aspirational.
13	15. Data and parameter not monitored	214	Data / Parameter table 9. & Data / Parameter table 10 Publish the technical basis for the wood-to-charcoal conversion factor of 5:1 applied to artisanal charcoal upstream emission factors in Data/Parameter Tables 9 and 10, and reconcile this figure against the ratio of 6:1 applied under the CLEAR methodology and Gold Standard RECH v5.0.	Section 3.9.5 of the draft applies a wood-to-charcoal conversion factor of 5:1 for artisanal charcoal, materially lower than the 6:1 ratio used in comparable, previously reviewed methodologies (CLEAR; Gold Standard RECH v5.0). Field-based studies from Sub-Saharan Africa report values exceeding 6:1 in several contexts. A lower conversion factor understates the wood input — and therefore the upstream emissions — associated with a given quantity of charcoal, which runs counter to the conservativeness principle applied elsewhere in the standard.

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14	4. Applicability	table 1	Applicable to household cooking energy transitions through improved biomass cookstoves and alternative cooking technologies, including fuel-switching to lower-emission cooking solutions, such as LPG cookstoves (potentially) and electric cookstoves	Both the recently released methodologies i.e MEP013 (cooking energy efficiency) and MEP015 (cooking energy transition) are only allowed at household level. There has been considerable effort from most of the developing and global south countries to increase the access of clean cooking to institutional scale as well. Both the methodologies should allow the project to be implemented at the institutional level as well.