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	4. Applicability	Para 11 (a) - (i)	The methodology currently limits its applicability to user households (using fuelwood primarily) located in non-urban (rural) areas, without clarifying whether peri-urban or semi-urban households are eligible. In many countries, households in peri-urban and semi-urban areas continue to rely on traditional biomass or inefficient cooking technologies due to limited access to clean cooking fuels or affordability constraints. Excluding these areas may unnecessarily restrict the methodology's applicability and overlook significant greenhouse gas mitigation opportunities.	The methodology should clearly define the geographical eligibility criteria by: Expanding applicability to include peri-urban and semi-urban households, provided they demonstrate continued reliance on eligible baseline cooking technologies and fuels. Eligibility should be based on objective criteria such as baseline fuel use, household characteristics, or access to clean energy, rather than solely on administrative classifications. Providing standardized definitions for "urban," "peri-urban," "semi-urban," and "non-urban," referencing nationally recognized classifications (e.g., national census definitions or statistical agency classifications) to ensure consistent implementation across countries.

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2	4. Applicability	Para 11 (a), (b), (c), (d)	The methodology currently restricts the target application to household cooking, which may unnecessarily limit its applicability. In many regions, clean cooking technologies are also adopted by small commercial establishments (e.g., tea stalls, roadside food vendors, small restaurants, bakeries, and community kitchens) that rely on traditional biomass or fossil fuels and could achieve significant greenhouse gas emission reductions through fuel switching. Excluding these users may reduce the methodology's overall mitigation potential and market applicability.	Expand the eligibility criteria to include micro and small commercial cooking applications, provided that: The cooking device and fuel consumption remain within predefined capacity thresholds (e.g., maximum rated thermal capacity). Appropriate baseline fuel consumption and monitoring procedures are established for commercial users. Separate default values or monitoring approaches are provided where cooking patterns differ significantly from households. Large industrial or institutional cooking facilities (e.g., factories, hotels, and large catering operations) remain excluded unless covered under a separate methodology.
3	2. Definitions	para 7 (i)	Question 1: Stakeholders are requested to provide input on the proposed inclusion of gasifier stoves for households under this methodology, considering concerns related to their safety for household use, difficulties in managing tar, etc. Response: The inclusion of gasifier stoves under the methodology can be supported, provided that minimum technical, safety, and performance requirements are established to ensure their safe and effective deployment. While concerns regarding user safety, tar formation, and operational complexity are valid, these issues are largely dependent on stove design, fuel quality, user training, and maintenance practices rather than being inherent limitations of gasifier technology.	Rather than excluding gasifier stoves altogether, the methodology should permit their inclusion subject to the following conditions: The stove has been independently tested and certified against recognized performance and safety standards. The manufacturer provides clear operating and maintenance instructions. The project includes user training on safe operation and appropriate fuel use. Monitoring includes indicators such as continued stove usage, maintenance records, and user feedback on operational or safety issues. Project developers implement corrective actions where recurring safety or performance issues are identified.

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4	4. Applicability	Para 11 (d)	Question 2: Stakeholders are requested to provide inputs on the potential inclusion of LPG stoves as an Article 6.4 activity, considering concerns related to the lock-in risk of promoting new uses of fossil fuels under the Article 6.4 mechanism. Stakeholders are also requested to consider the different proposed conditions for eligibility of LPG cookstoves and the extent to which these address lock-in risks, the GHG emissions of LPG cooking versus alternatives available in the activity context, and so forth. Response: In many developing countries, LPG serves as an important transitional clean cooking solution, especially in regions where electric cooking, biogas, or other renewable alternatives are not yet technically, economically, or socially feasible. Therefore, eligibility should be determined based on country-specific circumstances rather than applying a blanket inclusion or exclusion.	If LPG cookstoves are included, the methodology should incorporate robust safeguards, including: Restricted applicability to countries or regions where renewable clean cooking alternatives are demonstrably unavailable, unaffordable, or technically infeasible. Mandatory comparison with renewable alternatives, demonstrating why options such as electric cooking, biogas, or ethanol are not currently practical for the target population. Alignment with national policies, ensuring that LPG projects support-not conflict with-the host country's long-term decarbonization and clean cooking strategies.
5	4. Applicability	Para 11	The methodology focuses mainly on biomass, electricity and potentially LPG, while excluding commercially mature clean cooking technologies like biogas cookstoves.	Expand applicability or provide a clear technical justification for exclusion until future revisions.
6	4. Applicability	Para 11 (a) - (ii)	Limiting biomass projects to countries with rural electrification below 50% does not necessarily reflect actual electricity reliability or cooking feasibility. Many countries exceed 50% electrification while rural households still predominantly use biomass.	Base eligibility on actual cooking fuel use, electricity reliability and affordability rather than a national electrification threshold.
7	4. Applicability	Para 12 (j)	The methodology states that “From 01 January 2028 onwards, stove usage, in accordance with section 7.4.1, shall be determined using SUMs, which may be conducted on a sampling basis.” While SUMs provide an objective means of measuring stove usage, making their use mandatory for all Article 6.4 activities may create significant implementation, financial, and operational challenges, particularly for large-scale Programmes of Activities (PoAs) in developing countries.	Allow project developers to select the most appropriate monitoring approach (SUM/KPT/CCT) based on: cookstove technology, project scale, data quality, cost-effectiveness, feasibility in the host country.

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8	6. Demonstration of additionality	Para 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. Question 3: Stakeholders are requested to provide inputs on the proposed thresholds comprising low cost to Activity 6.4 households, their advantages and disadvantages and proposed level. Response: Rather than adopting a fixed 50% production cost threshold, the methodology should prioritize household affordability and financial accessibility over production cost. A flexible, evidence-based affordability criterion would better reflect diverse socio-economic conditions across host countries while maintaining environmental integrity and enabling broader deployment of clean cooking technologies.	Instead of prescribing a universal threshold such as 50% of production cost, the methodology should adopt a more flexible, context-specific approach by: Requiring that project cookstoves be provided at a price that is demonstrably affordable for the target population, supported by market assessments or household affordability analyses. Allowing multiple financing mechanisms, including direct subsidies, instalment payments, pay-as-you-go models, results-based financing, and carbon-finance-supported discounts. Requiring activity participants to demonstrate that the pricing structure creates a genuine financial incentive compared with the baseline while maintaining accessibility for low-income households.
9	6. Demonstration of additionality	Para 40 (e)	Devices are provided to households [free of charge or may be sold to end users] for a fee that does not exceed [50 per cent] [XX per cent] of the production cost. Question 4: Similar to above, stakeholders are requested to provide inputs on the proposed thresholds comprising low cost to Activity 6.4 households, their advantages and disadvantages and proposed level. Response: Rather than adopting a fixed 50% production cost threshold, the methodology should prioritize household affordability and financial accessibility over production cost. A flexible, evidence-based affordability criterion would better reflect diverse socio-economic conditions across host countries while maintaining environmental integrity and enabling broader deployment of clean cooking technologies.	Instead of prescribing a universal threshold such as 50% of production cost, the methodology should adopt a more flexible, context-specific approach by: Requiring that project cookstoves be provided at a price that is demonstrably affordable for the target population, supported by market assessments or household affordability analyses. Allowing multiple financing mechanisms, including direct subsidies, instalment payments, pay-as-you-go models, results-based financing, and carbon-finance-supported discounts. Requiring activity participants to demonstrate that the pricing structure creates a genuine financial incentive compared with the baseline while maintaining accessibility for low-income households.

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10	6. Demonstration of additionality	Para 37 (d)-(ii) & Para 40 (b)- (ii)	The methodology states – "In the absence of the indices referred to in subparagraph (i), the internationally recognized Multidimensional Poverty Index (MPI) shall be applied. The population shall be considered to satisfy the poverty criterion where the average MPI score is 0.2 or greater. A single global MPI cut-off of 0.2 excludes populations that are biomass-dependent and under-served but sit just below 0.2, and the income ceiling excludes many households that still cook on solid biomass.	Broaden the poverty-eligibility criteria so that more biomass-dependent populations qualify: lower the MPI cut-off (e.g. towards 0.1) or express it as a band rather than a hard 0.2 floor.
11	6. Demonstration of additionality	Para 37 (e) & para 40 (c)	The methodology establishes a universal eligibility criterion based on the World Bank poverty threshold for lower-middle-income countries (e.g., USD 4.20/person/day, 2021 PPP) but does not specify how this requirement applies to Least Developed Countries (LDCs) and Small Island Developing States (SIDS).	Providing separate or more flexible eligibility criteria for activities implemented in LDCs and SIDS.
12	6. Demonstration of additionality	Para 72	The common practice thresholds, F, shall be: (a) [X] per cent for urban households; and (b) [Y] per cent for non-urban households. Question 5: Stakeholders are requested to provide inputs on the appropriate common practice thresholds for similar technologies in urban and non-urban areas. Response: Based on current clean cooking adoption trends and the need to maintain environmental integrity: Urban households: 20% Non-urban households: 30%	The methodology should also explicitly address peri-urban and semi-urban areas, which often display characteristics of both urban and rural markets. The methodology should also provide flexibility for Least Developed Countries (LDCs) and Small Island Developing States (SIDS).

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13	7. Baseline scenario	Para 90	Question 6: The MEP is considering the appropriateness of the flag and cap values. Further, the MEP is considering alternatives for aggregating or disaggregating the cap values, for example on a geographical basis. Finally, the MEP is also considering the utility of the "flag" values and requests stakeholder inputs on all these issues. Response: The proposed cap and flag values require further justification and should be based on representative empirical datasets covering different geographical regions, socio-economic conditions, and cooking practices.	The methodology should therefore adopt a hierarchical geographical approach, for example: Country-specific cap values where robust national datasets exist. Regional default values (e.g., Sub-Saharan Africa, South Asia, Southeast Asia, Latin America) where national data are unavailable. Global default values only as a fallback where no better information exists.
14	7. Baseline scenario	Para 142	The methodology applies a fixed annual baseline reduction without demonstrating that cooking fuel transitions naturally improve by 1% annually.	Support the adjustment with empirical clean cooking market evidence or make it country-specific.
15	8. Activity scenario	Para 172	Applying a blanket 75% cap where SUMs are absent may be excessively conservative and may not reflect actual behavioural changes across different project types.	Allow different yearly caps or literature-supported adjustment factors instead of a universal cap.
16	6. Demonstration of additionality	Para 38 & Para 41	Additionality fallback triggers cite the wrong paragraph. Paragraph 38 refers to "the conditions in paragraph 34", but the Option 1 biomass eligibility conditions are in Paragraph 37. Paragraph 41 refers to "the conditions in paragraph 37", but the Section 6.2.2 LPG/electric conditions are in Paragraph 40. As drafted, the fallback from simplified to comprehensive additionality is mis-anchored.	Correct the cross-references: in Paragraph 38, replace "paragraph 34" with "paragraph 37"; in Paragraph 41, replace "paragraph 37" with "paragraph 40".
17	6. Demonstration of additionality	Para 37(f) & 40(d)	The simplified additionality pathway requires that ≤4.5% of the target population already holds a technology of equal-or-higher efficiency. The 4.5% figure is stated without any derivation.	Request the empirical basis for the 4.5% value.