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A6.4 MEP011-A01: Draft Methodological tool: Analysis of lock-in risk (version 01.0)

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	GENERAL REQUIREMENTS	17	The tool should clarify that, for distributed household energy technologies, the technical or operational lifetime refers to the lifetime of the incentivised device system rather than persistence of household behaviour after device failure. Otherwise LPG transitions may be incorrectly treated as long-term lock-in despite finite device intervention.	Add clarification: 'For distributed household technologies such as cooking devices, activity lifetime shall correspond to the operational lifetime of the credited device system provided by the activity.'
2	APPLICABILITY	10	Requirement to identify lowest-emission alternatives including third-party or future options is impractical in household cooking contexts where accessibility depends on infrastructure, affordability and policy beyond project control.	Clarify that comparable alternatives refer to technologies realistically accessible and deployable for the target households under prevailing infrastructure and affordability conditions. Options not practically available within the project context should not be treated as comparable.
3	COVER NOTE	20	Efficiency improvements within an existing transition fuel (e.g. LPG stove replacement with higher-efficiency LPG) reduce emissions intensity and should remain eligible. These activities do not extend fuel persistence beyond baseline.	Add clause: 'Efficiency improvements within an existing cooking fuel, including retrofit or replacement with higher-efficiency devices, shall be considered eligible mitigation activities.'

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4	COVER NOTE	16	For cooking systems, manufacturer responsibility and crediting incentive end with device life. Continued fuel use after device failure lies outside project boundary and cannot be attributed to the activity.	Define: 'Activity lifetime for distributed cooking technologies equals the operational lifetime of the provided cooking system'
5	COVER NOTE	15	LPG is recognised in many national clean cooking strategies as a transition pathway delivering large emission and health benefits relative to biomass and charcoal. Excluding LPG would conflict with national transitions.	Add recognition: If an activity is recognised by host party as part of their NDC or authorised then the activity can skip the lock-in risk analysis.
6	GENERAL REQUIREMENTS	18	Climate policy should not incentivise reduced durability. Lock-in risk should relate to crediting duration, not product lifespan. Durable devices should not be penalised.	Add clarification: "Longer device durability shall not increase lock-in risk where crediting duration remains bounded within the intervention timeframe."
7	COVER NOTE	General	Lock-in analysis should not delay access to clean cooking in LDCs where electricity is not reliably available and LPG offers the most feasible emission and health improvements.	Assessment shall consider realistic technology availability and energy access constraints in LDC and developing country contexts.
8	COVER NOTE	General	Excluding LPG transitions risks slowing emission reduction and SDG7 progress for low-income households with limited energy options.	Mitigation activities improving clean cooking access and reducing emissions for underserved households shall not be deemed non-additional solely due to inaccessible future alternatives.