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<i>Name of submitter</i>	Chetan Aggarwal
<i>Affiliated organization of submitter</i>	Climate Spring
<i>Email of submitter</i>	chetan@climatespring.org
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Document reference number and title: (Recommendation from the MEP to SBM020)

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	15	<p>This tool should include technologies that can be classified as "positive list". Such technologies should include but not limited to renewable energy (such as grid connected or off grid solar PV - e.g., ACM0002 or electrification of communities methodologies), removals technologies such as Direct Air Capture (because either there is DAC or there is not, there is not alternative). This list should also consider host country eligible activities. The inclusion of positive list a must - this is because, it would encourage developers to not go through extra step of lock-in analysis and will prefer to do projects that are in positive light. Plus, any sort of standardisation for such as subjective topics is crucial to prevent gaming. [Note - I can personally think of many instances where I can game in project as per the requirements established in the draft tool]</p>	<p>Step 0: The methodological tool includes positive list as follows: - Activities including Grid connected or off grid renewable energy such as solar PV with or without energy storage, wind, hydro, geothermal, tidal and wave. - Activities listed as "positive list" and submitted by the host country to UNFCCC as host country requirements. It is assumed that for these technologies the host country has conducted any potential lock-in risk analysis and this list considers any host country circumstances. - Activities that include energy efficiency in residential or commercial settings that are not directly linked to fossil fuel combustion. These technologies include replacement of devices such as motors, air conditioning systems, lighting devices and electric cooking devices and electric water filtration devices whose functioning does not have direct connection (physical connection) with fossil fuel combustion. These technologies shall be powered by grid connected electricity or directly via renewable energy sources. (For grid connection, it is assumed that as per country's NDC, the grid will get cleaner). [I have also added this because, these types of activities are inherently leading to better resource efficiency]. [I have not added activities such as efficiency of engines of trucks because that depends highly on national circumstances and technology availability} - Projects that directly substitute fossil fuel with other source of energy. E.g., coal with biomass or gasoline with ethanol. (do not worry on biomass, as sustainability and excess presence would be defined in the biomass accounting tool). - Novel activities such as Direct Air Capture, Enhanced Rock Weathering, etc. - Activities that involve capture and destruction of "super pollutants" such as refrigerants. if the technology does not fall into positive list as in step 0 - following procedures as below.</p>

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2	APPLICABILITY	9	<p>The requirement state "only applicable to activities that generate at least one measurable output". here, I think it is a bit clear if output means a product (e.g., less GHG intensive cement) or service (e.g., public transportation). If this true, kindly add footnote for better clarification. Does this also mean that typical projects that lead to no output does not need to go through this? e.g., destruction of HFCs? Where projects such as carbon capture (DACCS or BECCS), there is no output of a product, but only CO2 that is going deep into Mother Earth. so such projects are also exempt? {this is different projects such as CO2 infused concrete} This requirement also seems to be a bit weird, e.g., 1 projects that include only flaring of landfill are not required to use this tool - as there is no output of a product or service. But for projects that include landfill flare and electricity production need demonstrate that there is no-lock in analysis? E.g., 2: is there are projects that are capturing and destroying coal bed methane - since there is no output, the project does not do go though the troubles of lock-in analysis but if project is also producing electricity, it needs to go through the trouble? if the above is true (and I think it is, by the way it is written), this is not really promoting more actions to reduce GHG emissions.</p>	<p>Either remove this requirement or update based on above comment please.</p>

3	GENERAL REQUIREMENTS	18 a	<p>"if the applicable lifetime is no more than 10 years, then activity is not deemed to have a lock-in risk" I can understand, that these requirements are done so that projects such as cookstoves do not fall into the trap. Because, for sure, if you remove this 10 years timeline requirements, and require the usual improved thermal efficiency cookstoves, they might never pass this test for sure, as electric and metered devices would be deemed better than this. But, this has to be seen from another lens too. E.g., many pyrolysis have lifetime between 5-15 years. so by this logic, if I choose a machine that has lifetime of 11 years and go through mini research project using the tool. But, if I choose a machine that has technical lifetime as prescribed by manufacturer as 9 years and 11 months, I am fine. From a circular economy perspective, if the machine can be used (efficiently) for more time, the better it is. Such requirement should promote that. This requirement does not seem to be. Even for ICS - they can have typical operational years of 5 years and after that they would need to be replaced. However, in the case above of pyrolysis, the crediting period would end at lifetime of the machine but for ICS, the crediting period would continue. In such cases, there should be a requirement of technology graduation (depending on commercial availability of the technology) where the replaced cookstove should be better efficiency than the previous. Also, third angle: if I use energy efficiency measure in coal power plants for 5 years, this tool is not valid (even if in future it becomes eligible for brownfield projects) but building biomass fired power plant would need to go through this. Also - this requirement may not really fit well for projects with measures or practices are much longer - e.g., ARR on barren land, agroforestry, AWD projects, SOC increase projects. I do not think that they should be really going through things such as GHG intensity comparison as in Step 2. Of course, even in these activities, there has to be safeguards - environmental and social - but that can be addressed either via SD tool or via applicability conditions in the methodology (preventing monoculture in certain scenarios, etc).</p>	<p>Remove the 10 years requirements. For critical projects such as cookstoves - either add in positive list above with clause in methodologies on technology graduation. (in many countries, it can anyway be addressed if the host country has provided list of eligible activities in PACM or a positive list).</p>
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4	GENERAL REQUIREMENTS	5.2 - GHG intensity assessment	Logically, if the baseline approach used is "BAT" or "performance benchmark", the activity should not be required to do GHG intensity assessment. This will promote standardised forms of baseline and additionality demonstration.	Add a paragraph before 19. "Where the activity uses Best Available Technology or Performance Benchmark to define baseline, the activity is not required to conduct GHG intensity assessment"
5	GENERAL REQUIREMENTS	5.2 GHG intensity assessment	From the section, it is not clear what really constitutes GHG intensity (or maybe my interpretation is not upto the mark). What does it mean from the two? A: net GHG emission reduction per unit of output OR B: project + leakage emissions per unit of output ideally, it should be A. but that would also mean that to assess alternatives - the activity is required to have detailed LCAs for many alternatives to be compared to the activity. However for this, I am assuming A. If it is really B. The rule can be simple - the project emissions shall not be more than [10] or [20]% of the net GHG emissions reduction or removals.	Define GHG intensity for the context of the tool. - The GHG intensity refers to the net GHG emissions reductions or removals per unit of output
6	GENERAL REQUIREMENTS	20.	This requirement shall also include - the host country/national circumstances and where relevant local circumstances. This could include identifying situations or scenarios where the intensity of only relevant technologies/measures/practices need to be compared and not really all commercially and financially viable alternatives. E.g., Farm equipments maybe commercially available. however, in the context of the host country (e.g. India) the typical land holding size is very small. Hence, this as alternative to project to reduce GHG emissions shall not be included. Consideration of host country circumstances is also required as per additionality standard (and I think RMPs too?). It is critical to ensure that geographies (e.g., LDCs) where carbon finance goes a long way, these geographies are not punitively excluded by typical mathematical/statistical assessments.	The activity participant shall also describe and refer to national and/or local circumstances that are essential for consideration of alternative technologies, measures and practices such as it represents real and practical project circumstances.

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7	GENERAL REQUIREMENTS	21 b	It is requested that, such forward looking requirements are not included. These are very theoretical and does not represent reality. E.g., Previous Electric Vehicle policy of Delhi wanted 25% of all new vehicles sold to electric. This was seen very possible due to strong incentives by the government and increasing options for buyers in various categories at that time. However, even in 2026, the penetration in vehicles such as Cars is barely 8-10% in Delhi, whereas national penetration is about 4-5% for cars. If this would have been evaluated, in theory, alternative available that have much better infrastructure in Delhi such as CNG would have not been taken by fleet buyers. Future seeing assessments may not always see reality of the project.	removal of forward looking requirement - 21b
8	GENERAL REQUIREMENTS	paragraph 25 and equation 1	I am unsure if this equation really works. If it does, the document should include an example (probably a real case?)	addition of an example for paragraph 25 and equation 1
9	GENERAL REQUIREMENTS	Para 25	As an alternative, if the net GHG emissions reductions or removals per unit are better than alternatives as compared from national values, global values or using defaults, this equation is perhaps not required. It is to be noted that, whether this should be based on actual process E.g.. if the alternatives to composting of waste includes using waste biomass as feedstock for electricity/heat or using waste biomass as fuel (e.g., through briquettes). GHG intensity should be compared amongst composting vs electricity vs briquettes. Of course, it should be based on national circumstances - e.g., if there is a lack of grid connection in the region, biomass for electricity to be provided for the grid can not be used (hence the relevance of national or host country circumstances as mentioned before)	Addition of approach - Where the net GHG emissions reduction or removals per unit of out (e.g., tCO2e removals per hectare of land) is higher than alternatives. This can be compared with values available at national level, peer reviewed research papers or global defaults.