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<i>Name of submitter</i>	Annelise Gill-Wiehl
<i>Affiliated organization of submitter</i>	Columbia University UC Berkeley Carbon Trading Project
<i>Email of submitter</i>	ag5050@cumc.columbia.edu
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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	COVER NOTE	Para. 8 / Table 1 (Step 2 – GHG Intensity Assessment)	The F lock-in factors need to be adjusted for context. Particularly, as the lowest-GHG alternative in the cooking sector is typically electric induction, other fuels will almost always fall above the implied threshold when compared to that benchmark. This would effectively disqualify build infrastructure for other fuels through Article 6.4 credits in most country contexts — even where alternative fuels represent a major improvement over the existing baseline of wood and charcoal use. The tool does not appear to account for contexts where the lowest-GHG alternative is not commercially available or economically accessible to the relevant user population.	Amend Table 1 to allow mechanism methodologies serving energy-poor households to apply a differentiated F lock-in value, or to specify that the lowest-GHG alternative must be commercially available and economically accessible in the project region within a reasonable timeframe. Suggested text addition: 'Where the mechanism methodology demonstrates that the lowest-GHG alternative is not commercially available or economically accessible to project participants within [10] years of the activity start date, the mechanism methodology may propose an adjusted F lock-in value supported by a reasoned justification.'

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2	COVER NOTE	Para. 21(b)–(c) / Para. 10(d) (Case ii: Third-party alternatives)	The inclusion of alternatives that could be implemented by third parties (Case ii) is problematic when applied to clean cooking projects in low- and middle-income country settings. The premise — that a project participant's choice locks out a lower-emitting technology another party could otherwise deploy — does not hold well where grid infrastructure, supply chains, and end-user affordability constraints make those alternatives effectively unavailable for the foreseeable future. Applying Case ii to LPG projects would create a situation where credits are denied based on the theoretical availability of induction stoves that are not, in practice, a realistic near-term option for the target beneficiaries.	Clarify that Case ii applies only where there is credible evidence that third-party alternatives could realistically be deployed in the same project region and timeframe. Suggested text: 'When applying Case ii, the mechanism methodology shall specify criteria for assessing whether the identified third-party alternatives are commercially and logistically feasible within the project region and within [10] years of the activity start date. Where this cannot be demonstrated, only Case i alternatives shall be considered.'
3	GENERAL REQUIREMENTS	Para. 9–10 (Cover Note) / Para. 19–26 (Step 2 general)	The tool compares the proposed activity's GHG intensity against the lowest-intensity alternative available — but does not appear to require that comparison to be made against a realistic baseline. For clean cooking projects, the relevant baseline is typically wood or charcoal combustion. Anchoring the lock-in assessment solely to the lowest-GHG alternative, without reference to the baseline scenario, may produce conclusions that are technically correct but practically misleading: a technology that achieves 70–80% emission reductions relative to BAU could still be deemed to have lock-in risk.	Introduce an additional consideration in Step 2 that accounts for the magnitude of emission reductions relative to the BAU scenario, not only relative to the lowest-GHG alternative. Suggested text: 'In cases where the proposed Article 6.4 activity achieves a GHG intensity reduction of at least [X]% relative to the BAU scenario, the mechanism methodology may propose a modified G1threshold, provided that a reasoned justification is submitted demonstrating that the activity does not materially prevent lower-GHG alternatives from being deployed.'

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4	GENERAL REQUIREMENTS	Para. 28–34 (Step 3 – Resource Use Efficiency)	The resource use efficiency step creates uncertainty for projects by leaving open the question of whether certain fuels would be classified as a resource that is 'substantial for mitigating climate change.' If so, projects would need to proceed to further analysis, adding cost and uncertainty. Simultaneously, Option 2 contains no normative text at all, meaning the outcome of this step may depend entirely on host Party authorization — which is an appropriate safeguard in some contexts, but may not be consistently applied across countries with varying institutional capacity. The current ambiguity creates a material barrier to project development and financing.	Clarify the treatment of transitional fuels under Step 3, and provide more substantive guidance under Option 2. Suggested text: 'For transitional fuels used in clean cooking activities serving energy-poor households, mechanism methodologies shall specify criteria for determining resource abundance and relevance to climate objectives, taking into account the scale of the activity relative to national fuel supply and the absence of commercially viable lower-GHG alternatives for the target population.'
5	GENERAL REQUIREMENTS	Para. 6–14 (Cover Note – General Design)	The tool does not differentiate between activity types by scale, population served, or development context. A clean cooking project reaching tens of thousands of households in rural sub-Saharan Africa is treated under the same framework as large-scale industrial infrastructure. For cooking energy transitions specifically, the human development co-benefits — reductions in indoor air pollution, time savings, gender equity impacts — are central to the rationale for crediting. The current design of the tool risks making it systematically harder to finance the clean cooking projects that are most needed in the hardest-to-reach communities, by applying a lock-in standard calibrated primarily for energy infrastructure of a different character.	Request that the MEP consider whether a separate or simplified pathway for specific activities serving low-income populations. Suggested text: 'For mechanism methodologies serving low-income households in low- and middle-income countries, the methodology may propose alternative approaches to steps 1–4 of this tool, subject to approval by the Supervisory Body, where the standard thresholds are demonstrated to be inappropriate given the activity context.'

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6	GENERAL REQUIREMENTS	Para. 21(b) / Note following Para. 21 (Forward-looking alternatives)	The bracketed text in paragraph 21(b) proposes that the list of alternatives include technologies 'that can be reasonably expected to be implemented within the next [5] years.' For clean cooking in low-income settings, this provision could bring electric cooking into scope as a comparator, even in contexts where grid reliability, appliance affordability, and consumer acceptance remain significant barriers. A 5-year horizon is insufficient to capture the structural constraints that make other fuels a more realistic near-term option than electricity-based cooking in many project regions. The MEP's request for stakeholder views on this bracketed text is therefore particularly important for the clean cooking sector.	In response to the MEP's request for stakeholder views: the forward-looking alternatives provision should either be removed or refined so that only alternatives with demonstrated commercial viability in the specific project region and socioeconomic context are included. Suggested text: 'Alternatives expected to be implemented within [5] years shall only be included where the mechanism methodology demonstrates that such alternatives are commercially available, affordable to end-users, and supported by adequate infrastructure in the project region.'