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Document reference number and title: (Recommendation from the MEP to SBM020)
Draft mechanism methodology: Energy efficiency measures in household cooking (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	APPLICABILITY	Section 4, paragraph 11(c) — Peri-urban/urban exclusion	Paragraph 11(c), read together with footnote 10, actively excludes peri-urban and urban households from this methodology wherever a national or sub-national classification system exists. We submit that this exclusion is inconsistent with the empirical reality of biomass cooking in the developing world and request the MEP to reconsider. Rural–urban migration in developing countries does not transfer households into energy security. For instance, Ravallion, Chen & Sangraula (2007) demonstrate in the Population and Development Review that urbanization in developing countries redistributes poverty spatially rather than reducing it, a dynamic UN-Habitat has explicitly linked to the persistence of energy deprivation in informal urban and peri-urban settlements. Another study, Batchelor et al. (2021) (in Energy Research & Social Science), finds that informal urban households continue to rely on solid biomass for cooking due to the unaffordability of cleaner fuels and barriers to grid access, with this reliance persisting even after years of urban residence. Kansiime et al. (2022) (BMC Public Health) document that 89% of households in an informal urban settlement in Fort Portal city, Uganda, cook primarily with charcoal, with indoor air pollution levels indistinguishable from the rural settings this methodology targets. Please consider these references as a non-exhaustive list. These households satisfy the pre-activity conditions of paragraph 13(a) in every material respect. Their exclusion under 11(c) is an artifact of administrative classification, not a reflection of their cooking practices or energy access. References (non-exhaustive list) Ravallion et al. (2007). New Evidence on the Urbanization of Global Poverty. Population and Development Review, 33(4), 667–701. UN-Habitat. Statement to the UN Department of Economic and Social Affairs. UNDESA Batchelor et al. (2021). City living but still energy poor. Energy Research & Social Science. ScienceDirect Kansiime, W.K., Mugambe, R.K., Atusingwize, E., et al. (2022). Use of biomass fuels predicts indoor particulate matter and carbon monoxide concentrations; evidence from an informal urban settlement in Fort Portal city, Uganda. BMC Public Health, 22:1723.	We recommend revising paragraph 11(c) to include peri-urban and urban households, subject to project-level safeguards consistent with paragraph 13(a), and demonstrated lack of access. This preserves the methodology's integrity while ensuring it reaches all households for whom it was designed.

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2	APPLICABILITY	Section 4, paragraph 11(c); Appendix 7, Section 1, paragraphs 1–2 — Rural-only restriction	Methodology applies only to activities implemented in rural areas per national/sub-national classification (¶11(c)). Peri-urban and urban explicitly excluded. Excludes a major segment of the actual clean-cooking deficit. Peri-urban populations using fuelwood/charcoal have the same emissions profile and lack of clean cooking access as rural households. The exclusion is not justified by emissions integrity - it is a policy preference. It also creates classification arbitrage risk (governments differ in what is 'rural').	Remove the rural-only restriction. Anchor applicability on: (i) primary fuel ≥75% biomass (already in ¶13(a)) and (ii) demonstrated lack of clean cooking access through pre-activity survey. Allow peri-urban and low-income urban contexts where the biomass-fuel applicability condition is met. Add transparent reporting of national/sub-national classification used. A project-specific empirical framework triggers eligibility on observed cooking practices, not on administrative geography. The MPI/$4.20 PPP cap in ¶13(d)–(e) already filters for low-income; layering on rural-only is redundant and excludes additionality-eligible populations.

3	APPLICABILITY	Section 4, paragraphs 13(d)–(e); Appendix 7, Section 1, paragraphs 1–2 — MPI / $4.20 PPP poverty test Part 1 of 2	Eligibility for emission-reduction crediting under Article 6.4 is properly governed by the additionality demonstration and applicability conditions of the methodology, supported by the standardized tools of the A6.4 Supervisory Body (investment analysis, barrier analysis, common practice analysis). A population-level poverty test is not a determinant of GHG accounting and is not a recognized additionality instrument under the A6.4 framework. By inserting poverty status as a binding eligibility gate at Section 4 ¶13(d)–(e), the MEP conflates two distinct constructs: (i) the socio-economic profile of the target population, which is appropriate to sustainable development co-benefit assessment, and (ii) the additionality of the GHG mitigation activity, which is appropriate to crediting eligibility. The two should be assessed under separate frameworks; folding them into a single threshold creates eligibility outcomes that do not track GHG additionality. The draft methodology appears to assume that traditional biomass cooking is a static poverty marker. Peer-reviewed evidence on sub-Saharan Africa rejects this assumption. Fuel-stacking studies consistently find that biomass, particularly charcoal, is used across the household income distribution in SSA, with high-income households retaining biomass fuels alongside LPG and electricity (Zulu et al., 2026, Energy for Sustainable Development, on Lusaka and Lilongwe; Tucho, 2022, Global Challenges, on Jimma, Ethiopia, where 80%+ of households are grid-connected and 85%+ still use biomass for cooking; Masera, Saatkamp & Kammen, 2000, World Development, foundational fuel-stacking critique of the energy-ladder model). A poverty-indexed eligibility test therefore systematically excludes GHG-additional populations who use traditional biomass for reasons that include cultural cooking practices, fuel reliability, appliance constraints, and food-type requirements, not income alone. Specific defects in the proposed thresholds. (i) Measurement-scale mismatch. The Global MPI is published by UNDP/OPHI at sub-national administrative units defined by national statistical agencies. Carbon-project activity boundaries do not, in general, align with these administrative units. Applying the MPI	Delete Section 4, paragraphs 13(d) and 13(e) and the supporting provisions in Appendix 7, Section 1, paragraphs 1–2. Replace with a provision that requires the activity to demonstrate additionality through the A6.4 additionality and baseline tools, with the population's socio-economic characterization moved to the sustainable development co-benefits section of the PDD as a descriptive (not gating) element. Alternatively, if the Panel retains a socio-economic eligibility filter on policy grounds, the following modifications are essential: Decouple from additionality. Make the test explicitly a co-benefit eligibility filter for SDG-1 (poverty) reporting, not a GHG-crediting gate. Country-classification-conditional thresholds. Apply the World Bank international poverty line corresponding to the host country's income classification, not a single $4.20/day cap. Replace MPI 0.20 with a published, defensible threshold. Reference an OPHI/UNDP publication that supports any cut-off used, or apply a relative threshold (e.g., the host country's MPI 75th percentile across reporting sub-national units). Resolve the geographic-scale mismatch. Specify the procedure for applying sub-national MPI to project boundaries that do not coincide with UNDP/OPHI reporting units (e.g., area-weighted aggregation with explicit uncertainty propagation). Add a transitional-population provision. Permit inclusion of households above the income/MPI threshold where the activity proponent demonstrates, through baseline survey data, that traditional biomass cooking persists in the population and that clean-cooking access barriers remain binding.

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			to a non-conforming geography is a categorically different statistical operation than applying it to the unit for which it was estimated, and the methodology provides no procedure for handling this scale mismatch. (ii) Country-category exclusion. The $4.20/day PPP threshold is calibrated by the World Bank specifically for lower-middle-income countries. Section 4 ¶13(e) applies the threshold irrespective of country income classification. This excludes populations in upper-middle-income host countries with persistent rural and peri-urban biomass dependence (e.g., parts of South Africa, Brazil, Indonesia, Namibia), notwithstanding documented GHG-additional opportunities in those settings. The threshold should at minimum be country-classification-conditional, applying the relevant World Bank international poverty line ($3.00/day, $4.20/day, or $8.30/day in 2021 PPP) for the host country's income category.	

4	APPLICABILITY	Section 4, paragraphs 13(d)–(e); Appendix 7, Section 1, paragraphs 1–2 — MPI / $4.20 PPP poverty test Part 2 of 2	(iii) MPI 0.20 threshold lacks methodological basis. The MEP itself acknowledges at Appendix 7, Section 1, paragraph 1 that "the global MPI does not define a formal population-level threshold." The example provided (H=0.4, A=0.5) is illustrative, not normative. Adopting 0.20 as a binding eligibility cut-off without published statistical justification, sensitivity analysis, or alignment with any UNDP/OPHI guidance creates an arbitrary boundary that materially affects project eligibility. Additional structural concern: transitional populations. The poverty test creates a binary inclusion/exclusion regime that does not account for households in income transition. Populations whose recent income gains have moved them above the threshold but who still cook with traditional biomass, because clean-cooking appliances and fuels remain unaffordable on a cash-flow basis, or because the local market does not yet provide them, are excluded from project access despite being precisely the population for which carbon-financed clean-cooking interventions are most additional and most beneficial. The structural rationale for carbon finance in clean cooking is documented in the global access data: global clean cooking access has grown at approximately 1.4% per year (2010–2022), concentrated in five large LMICs with little change elsewhere; the number of people in sub-Saharan Africa without clean cooking access has continued to grow; the Carbon Credit Quality Initiative independently rates clean cooking 5-star for additionality on the basis that the sector cannot scale at the required rate without concessional finance instruments. Demonstrating additionality through the standard A6.4 tools (investment analysis showing the project IRR below benchmark without carbon revenue; barrier analysis; or common practice analysis showing penetration below the relevant threshold) directly tests whether GHG reductions would have occurred in the absence of the activity. Poverty status does not.	See previous answer
5	APPLICABILITY	Section 4, paragraph 13(j); Section 7.1.1, paragraphs 37–41 — 4.5% common-practice threshold	Methodology not applicable if >4.5% of target-population households have a functional cooking technology of equal or higher efficiency than the project cookstoves (¶13(j)). Derivation: App.7 §2 ¶6(a) - 1.5%/yr	(a) Replace single 4.5% threshold with a barrier-analysis option: the activity may demonstrate that despite some penetration of equivalent stoves, persistent affordability/access barriers prevent diffusion to

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			non-additionality rate × 3 years = 4.5%. (i) The 4.5% threshold derives from a single weighted average in Gill-Wiehl 2026 (App.7 §2 ¶6(a)), with the methodology itself noting the original Gill-Wiehl figure of 4.2%/yr was 'influenced by one particular case' (a national LPG subsidy) and that 'eliminating cases where subsidies are present' brings it to ~1.5%/yr. This is a fragile derivation - sensitive to one outlier study and to a non-transparent re-weighting. (ii) The 4.5% applies to ANY equivalent-efficiency stove regardless of fuel - so e.g. an LPG stove already in the household (efficiency ~50%) counts the same as a clean biomass ICS, even though it solves a different problem. (iii) Operationally hard - requires every project to enumerate cookstove efficiency in the target population.	the target households. (b) Apply the equivalent-tech check ONLY to comparable improved biomass cookstoves, not to LPG/electric stoves that serve a different role in stove stacking. (c) If a fixed threshold is retained, derive it from a broader literature base and transparent sensitivity analysis, not one re-weighted Gill-Wiehl figure. (d) Move the assessment from applicability (binary kill condition) to a baseline adjustment (proportional discount). A project-specific framework treats high common-practice penetration as a barrier-analysis input or a baseline adjustment, not a binary applicability kill switch. Hard-coding 4.5% from a single re-weighting of one study creates fragility.
6	APPLICABILITY	Section 4, paragraph 13(d) — Poverty test as applicability criterion	Paragraph 13(d) under Section 4 sets the following applicability criterion: "The Article 6.4 activity shall be implemented in locations where the population is demonstrated to experience low income or poverty levels based on a recognized poverty index". We generally disagree with the use of a poverty level to evaluate the eligibility of a population for an Article 6.4 activity. First, such questions or data are extremely intrusive to collect from individual households. Second, we do not think poverty is the right indicator for eligibility; we cannot imagine being forced to refuse to deliver a clean cooking solution to a household because they are not poor enough. Finally, poverty is a complicated indicator to standardize, particularly here, where it can vary under option (iii).	For all these reasons, we recommend not using poverty levels and removing paragraph 13(d) entirely.

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7	DEMONSTRATION OF ADDITIONALITY	Section 7.1.1, paragraph 38(a) — Excluding carbon projects from the baseline	It is essential that adoption of improved cookstoves based on carbon finance should not be part of the baseline, since it does not represent the baseline scenario by definition. Also, several provisions have made the continuation of a project in the long run much more conservative, e.g. updating baselines, regulatory additionality, lock-in criteria, inter alia.	Keep paragraph 38 a, i.e. (a) [Exclude technologies installed under another activity registered under another carbon crediting scheme";]
8	DEMONSTRATION OF ADDITIONALITY	Section 6, paragraph 25; Appendix 7, Section 2.2, paragraphs 4–6 — Additionality / benchmark conflation	Additionality demonstrated via: (i) regulatory analysis (¶24, ¶27); (ii) standardized lock-in analysis at methodology level (¶25); (iii) performance-based approach using thermal efficiency thresholds of 16.6% (wood) and 23.6% (charcoal) - same values as the ambitious benchmark. (i) Conflating additionality threshold with baseline benchmark - they have different purposes (additionality = barrier demonstration; benchmark = baseline emissions). Using the same number for both means any project just above benchmark efficiency is BOTH additional AND credited against itself with near-zero net ER. (ii) No project-specific barrier analysis option is provided - every project is forced through the performance-based route. (iii) The 23.6% charcoal additionality threshold sits within the variability of measured traditional charcoal stove efficiencies (22.1% ± 9.8%, App.7 §6 ¶27) - i.e., some traditional stoves could pass the additionality test by random performance variability.	(a) Decouple additionality threshold from baseline benchmark: set additionality minima at the lower of the two (e.g., 16.6% wood, 23.6% charcoal) but use a lower baseline benchmark for ER calculation. (b) Add an option for project-specific barrier analysis (investment, technological, prevailing practice, institutional, financial) as an alternative to performance-based for projects in atypical contexts. (c) Raise the charcoal additionality threshold above the upper uncertainty bound of unimproved charcoal stoves to >32% to prevent false-positive additionality from baseline variability. A project-specific framework allows multiple additionality routes (barrier analysis, performance-based, common practice), tailored to the activity's circumstances. A hard-wired single threshold without alternatives reduces credibility and excludes contexts.

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9	DEMONSTRATION OF ADDITIONALITY	Appendix 7, Section 2.2, paragraph 6(a) — Gill-Wiehl 2026 re-weighting	App.7 §2.2 ¶6(a): Gill-Wiehl 2026 reports 4.2%/yr spontaneous ICS adoption in similar contexts; methodology re-weights to ~1.5%/yr by 'eliminating cases where subsidies are present' through the regulatory analysis filter. This is then used to derive both the performance threshold (90% additionality probability claim) and the 4.5% equivalent-tech applicability cap. (i) The re-weighting from 4.2% to 1.5% is described qualitatively, not quantitatively - no transparent calculation of what was excluded. (ii) The same re-weighted figure drives TWO independent applicability/additionality constructs (the threshold and the 4.5% cap), compounding any error in the underlying assumption.	(a) Publish the re-weighting calculation: which Gill-Wiehl cases were removed, the remaining sample size, and the resulting weighted average with confidence intervals. (b) Conduct sensitivity analysis of additionality probability claims across the 0.5%-3.0%/yr range. (c) Decouple the additionality threshold and applicability cap so they don't both depend on the same fragile re-weighting. A project-specific framework discloses the calculation chain underlying any centralized threshold and tests the result against alternative parameterisations.
10	DEMONSTRATION OF ADDITIONALITY	Section 6.1, paragraphs 27(b)(ii) and 30 — Public-sector subsidy exclusion	Activity ineligible if 'public sector finance is providing a subsidy for the adoption of efficient cookstoves or cooking fuels or energy sources cleaner than fuelwood or artisanal charcoal' in the project geography (¶27(b)(ii)). If subsidy comes into effect during the crediting period, credits may only be claimed up to that date (¶30). (i) Broad subsidy exclusion catches situations where the subsidy is small, partial, or targets a different population than the project. A nationwide LPG subsidy for urban areas would disqualify a rural cookstove project where LPG is not accessible. (ii) The geographic scope ('in the geographic boundary of the Article 6.4 activity') is not defined - does it mean the project boundary, the host Party, the sub-national region? (iii) Cliff-edge crediting cutoff at subsidy date is punitive - many subsidies have limited reach and slow uptake.	(a) Narrow the subsidy exclusion to subsidies that: (1) are accessible to the target households of the activity (not just to a different population in the same country); (2) materially shift the adoption economics; (3) cover the same technology category. (b) Replace cliff-edge cutoff with proportional adjustment: credits reduced by the documented uptake of the subsidy in the target population during the period. (c) Define 'geographic boundary' explicitly. A project-specific framework assesses subsidy impact on the activity's actual target population, not on jurisdictional overlap.

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11	DEMONSTRATION OF ADDITIONALITY	Section 6 — Absence of barrier-analysis additionality route	Additionality demonstration is regulatory analysis + standardized lock-in + performance-based. No barrier analysis (investment, technological, prevailing practice, institutional, financial) is offered. Performance-based additionality is fast but blunt. Activities in contexts not well-represented by the underlying literature (atypical geographies, novel business models, early-mover markets) cannot demonstrate additionality through other means.	Add an optional barrier-analysis route consistent with paragraph 32 (or equivalent) of Standard A6.4-STAN-METH-003, available to activities that document why the performance-based approach is unsuitable for their context. A project-specific framework offers multiple additionality routes - the activity selects based on its specific barriers and context, not constrained to one centralized approach.
12	BASELINE SCENARIO	Section 7.1, paragraph 35 — Pre-activity survey cross-check rule	Pre-activity survey findings cross-checked with national/regional surveys or reputable literature; if the cross-check value is more conservative (e.g., lower household size), the cross-check value SHALL be used instead of the survey result. The asymmetric rule (always defer to the more conservative external value) creates a downward bias in ER. Field surveys are designed to be representative of the target population; national averages may not represent the activity's specific geography. The asymmetry is not justified.	Replace 'shall' with 'shall be reconciled': document any discrepancy >10% between survey and external data, investigate the source, and select the value supported by the stronger evidence base for the activity geography. If unresolvable, apply the more conservative. A project-specific framework treats project survey data as primary, with cross-checks as validation rather than override.
13	BASELINE SCENARIO	Section 7.1, paragraph 31 — 'Pre-activity scenario' vs 'situation' terminology	The MEP would like to seek feedback from stakeholders on the use of the term “preactivity scenario” to describe observed conditions on the ground prior to implementation of an Article 6.4 activity, and whether it may be better to term this the “pre-activity situation” since it reflects empirical observations rather than hypothetical conditions.	It is not necessary to re-invent this, whether "scenario" or "situation" is used it is standard and understood that this section refers to what is going on the ground before project implementation.

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14	BASELINE SCENARIO	Section 7.2, paragraph 42 — KPT-based Option 3 baseline approach	Table 3 references the conservative methodology defaults, but where activity participants have access to robust pre-activity data we believe these should be considered the primary reference. The current draft methodology effectively closes off this route, which in our experience is the most reliable basis for an accurate baseline. For several years the market has aimed at reaching more accurate modeling, and project-specific empirical data would correspond to that ambition.	Allow project-specific empirical data (from pre-activity KPT) to be considered the primary reference for baseline consumption, with the Table 3 defaults retained as a conservative fallback. This is especially important because, in the current draft methodology, the project participant has no practical route to use measured pre-activity data.
15	BASELINE SCENARIO	Section 7.2, paragraph 42 — KPT-based Option 3 baseline approach	The methodology suggests two options here and we think neither should be retained. For several years the market has been aiming at more accurate modeling and methodological tools to evaluate the impact of cookstove projects. It is clear that the most accurate way of evaluating impact is by measuring it, in this case by conducting KPTs, which would correspond to the third option under paragraph 42.	Define an approached for baseline approach based on existing actual or historical emissions, adjusted downwards to ensure alignment with paragraph 33 of the RMP
16	BASELINE SCENARIO	Section 7.2, paragraph 42 — Reference for Table 3 default consumption values	Despite strongly recommending the use of a third approach to determine the baseline scenario, we think that each data point used to define the baseline scenario in the current draft methodology should be better explained and referenced, particularly because we cannot link it with any other sources used in other methodologies.	Please reference the supporting documents and logic behind the definition of total energy consumption of fuelwood of 0.0066 TJ/(person × year) and total energy consumption of charcoal of 0.0046 TJ/(person × year). If well referenced, these values can be used as a basis for reference or cap values, but not as the only applicable default for cookstove projects worldwide.

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17	BASELINE SCENARIO	Section 7.2 — Add Option 3 project-specific KPT baseline	We strongly believe that the methodology should incorporate an additional baseline option based on existing actual or historical emissions, derived from project-specific KPT measurements and adjusted downwards to ensure alignment with paragraph 33 of the RMPs. From our experience deploying KPTs at scale across multiple SSA markets, there is no measurement approach offering better accuracy than properly conducted project-level KPTs combined with rigorous protocol adherence. With strict KPT requirements, we can deliver the highest level of integrity for cookstove projects, anchored in directly observed reality rather than global averages. This third option could co-exist with Options 1 and 2 as currently drafted. It would also bring this methodology into closer alignment with the equivalent provisions in CLEAR, Gold Standard TPDDTEC, and Verra VMR0050, enabling more comprehensive use of digital monitoring activities (including digital KPTs) and supporting transparency and confidence in the carbon market.	Add Option 3, Project-specific measured baseline. Allow activity participants to determine the baseline using project-level KPT measurements of pre-activity baseline fuel consumption, subject to: • Conformance with a defined KPT protocol (suggested: aligned with the CCA KPT methodology referenced in Appendix 5); • Sampling reliability of 95/10 on total energy consumption per person per year; • Mandatory application of the BAU cap from Section 7.6 as a ceiling, i.e., the Option 3 KPT-based baseline shall be no higher than BAU_cons,y, ensuring compliance with paragraph 33 of the RMPs and removing any concern that empirical baselines could exceed the conservative envelope; • Demonstration that the resulting baseline is below the BAU baseline determined under Section 7.6. This preserves the methodology's conservativeness intent while restoring the value of empirically measured pre-activity baseline data, and aligns with the analogous provisions in parallel cookstove methodologies.

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18	BASELINE SCENARIO	Section 7.3, paragraph 44; Appendix 7, Section 3, paragraph 15 — Standardized useful energy 0.001095 TJ/person/yr	Standardized useful energy delivered for cooking set at 0.001095 TJ/person/yr (≈3 MJ/day), applied to all activities under this methodology. App.7 §3 ¶15 justifies this with the Gill-Wiehl 2024 range of 2-4 MJ/day and a cross-reference to Standard A6.4-STAN-METH-006 which permits up to 2.1 GJ/person/yr (5.75 MJ/day). The value sits at the BOTTOM of the cited 2-4 MJ/day range, and at 52% of the Standard STAN-METH-006 suppressed-demand threshold (5.75 MJ/day). The choice is internally inconsistent: the methodology cites a permissive standard then applies the most restrictive value possible. Compounding effect: this is a multiplicative input into the baseline fuel consumption (eq. 6 and 7) - every percent reduction in this parameter reduces credits by the same percent. A drop from 5.75 MJ/day (cited as permissible) to 3 MJ/day implies a ~48% baseline reduction.	Either (i) anchor the useful energy at a project-specific value derived from the pre-activity survey (cooking events × energy per event), with the suppressed-demand ceiling of 5.75 MJ/day as the cap; or (ii) if a centrally-fixed value is retained, set it at the midpoint of the cited range (3 MJ/day is at the lower bound - a midpoint would be 3 MJ/day for the lower-bound interpretation OR ~4.4 MJ/day if the upper bound from STAN-METH-006 is included as data). Document the sensitivity of total ER to this parameter. A project-specific framework derives useful energy delivered from observed cooking events, household size, and meal practices in the target population - not a single centralized value. The current choice is conservatism-stacking on top of the BAU efficiency upper bound and the 1%/yr downward adjustment, applied to the same parameter chain.

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19	BASELINE SCENARIO	Section 7.3, paragraphs 26 and 44 (Eq. 6) — Standardized useful energy (alternative framing)	The methodology applies a standardized useful energy of 0.001095 TJ per person per year (3 MJ/p/day) globally, supported in the methodology by a single reference to Gill-Wiehl et al. (2024), which itself cites a wide range of 2–4 MJ delivered per person per day. From our field observations across multiple markets, this single value is not representative of actual cooking energy needs on the ground. Useful cooking energy requirements vary significantly with: • Cultural cooking practices (slow-cooking traditional dishes versus quick-cooking preparations); • Seasonal variations (greater fuel use in cold seasons or for water heating); • Economic context (households with limited fuel access naturally constrain consumption); • Number of meals per day, household composition, and types of dishes prepared. Applying a single global default for useful cooking energy is, in effect, equivalent to applying a default emission reduction per stove based solely on stove efficiency. This is inconsistent with the methodology's ambition of measured, conservative quantification.	If not allowing the use of KPTs, we at least need to allow the standardized useful energy value to be regionally differentiated, with default values for SSA, South Asia, Latin America, and other relevant regions, derived from credible published surveys or controlled tests representative of the local cooking context. Alternatively, allow activity participants to demonstrate an activity-specific useful energy value through pre-activity surveys and KPTs, subject to the same statistical reliability requirements applied elsewhere in the methodology (95/10). Document the empirical basis for the global default value of 0.001095 TJ/p/yr in Appendix 7, with reference to the underlying datasets and any regional adjustment factors considered.
20	BASELINE SCENARIO	Appendix 7, paragraph 7 — Useful energy 3 MJ/capita/day range rigor	The scientific rigor under this paragraph is difficult to understand. The MEP arbitrarily chose 3 MJ/capita based on a study that specifically mentions a range: "reasonable range of 2–4 MJ delivered per person per day". In addition, the MEP mentions "consistent with the threshold value for useful energy delivered for cooking and heating up to 2.1 GJ per person per year (equivalent to 5.75 MJ per person per day)", which is not at all aligned with the 3 MJ/capita figure. It is concerning to cite a reference document and then not use the data provided by the study.	We think more studies must be evaluated to establish this number, and we should use ranges to ensure different situations and local characteristics are taken into account when defining a threshold for delivered energy for cooking per person per day.

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21	BASELINE SCENARIO	Section 7.3, paragraph 45 (Table 3); Appendix 7, Section 3, paragraphs 10–12 — Ambitious benchmark efficiencies (Option 1)	Option 1 (methodology-level) ambitious benchmark efficiencies: 16.6% for fuelwood, 23.6% for artisanal charcoal. Derivation (App.7 §3 ¶10-12): weighted average of 77.5% × unimproved efficiency (Urban 2025: 11.8% wood, 22.1% charcoal) + 22.5% × ICS efficiency (Jetter 2012: 32.72% wood, 28.49% charcoal). The 22.5% weighting comes from 'top 20% of the performance distribution' assumption applied to a 95.5%:4.5% baseline:ICS split. (i) The derivation chain is non-transparent: 1.5%/yr non-additionality (re-weighted from Gill-Wiehl 2026's original 4.2%/yr by removing one LPG-subsidy case) × 3 years = 4.5%; then top 20% of (95.5% baseline + 4.5% ICS) = 77.5% baseline-weighted + 22.5% ICS-weighted. Each step contains modeling choices that compound. (ii) Jetter 2012 are laboratory test results - App.7 §3 ¶11 admits 'they likely overestimate the efficiency of the ICS compared to field conditions, which is conservative for the purposes of baseline setting' - but the use of inflated ICS efficiencies in the benchmark RAISES the benchmark and reduces credits. The 'conservative' framing is inverted. (iii) The charcoal benchmark (23.6%) is barely above the unimproved charcoal central value (22.1%) - the benchmark is essentially the unimproved-cookstove efficiency. (iv) Option 2 (activity-level) is offered but is complex (5 steps) and may not be operationally distinguishable from Option 1 in practice.	(a) Reject Option 1 as default. Make Option 2 (activity-specific benchmark from pre-activity survey + literature) the primary approach, with project-specific data on the actual distribution of in-use stoves and their measured/cited efficiencies. (b) If Option 1 is retained for projects unable to characterize their baseline, re-derive the benchmark using FIELD-measured ICS efficiency (lower than Jetter 2012) - this would lower the benchmark and increase appropriately-credited reductions. (c) Make the 1.5%/yr non-additionality assumption project-modifiable based on local market data. A project-specific framework determines the baseline from the activity's own population and time period, not from a centralized weighting of two academic studies whose original purposes (one estimating adoption, one lab-testing stoves) were not baseline construction. The 'top 20% of performance' rule is borrowed from energy-benchmarking contexts (ENERGY STAR, App.7 fn 6) that do not map cleanly onto distributed cooking technology populations.

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22	BASELINE SCENARIO	Section 7.3, paragraphs 14 and 46; Appendix 7 — Option 2 activity-specific benchmark procedure	The Option 2 (activity-specific) benchmark procedure presents several practical challenges that, in our experience, make it difficult to implement in good faith: 1. Stove efficiency is not a reliable proxy for actual fuel consumption. The relationship between laboratory-tested thermal efficiency and field fuel consumption is often weak, depending strongly on cooking practices, fuel quality, and stove maintenance. Building a baseline on efficiency assumptions risks a meaningful disconnect from observed consumption. 2. Determining efficiency of stoves identified in pre-activity surveys is operationally difficult or impossible. Baseline cookstoves in target markets are typically traditional or artisanal devices for which no ISO 19867-1 test data exists. Conducting in-field efficiency testing is not feasible in many situations, and lab-testing of every observed stove type is prohibitively expensive. 3. The definition of "traditional" cookstoves is vague and creates a loophole in the methodology's conservativeness. Without a clear, audit-proof definition, activity participants and validators may legitimately disagree on which observed stoves count as "traditional" and which already qualify as "improved", with material consequences for the derived BM_BL. 4. Manufacturer specifications are not consistently available or comparable. Where the methodology relies on manufacturer-stated efficiencies, these are often unavailable for the artisanal stoves dominating the baseline, and where available are typically not ISO 19867-1-conformant.	Provide a more detailed and operationally robust step-wise procedure in Appendix 7 for Option 2, including: • A definitive, audit-proof definition of "traditional" cookstoves (e.g., absence of insulation, single-pot, no thermal envelope, primary fuel = solid biomass); • A fallback for stove types lacking ISO 19867-1 efficiency data, e.g., a default efficiency by archetype (3-stone, simple metal, mud-walled, ceramic) drawn from published studies, with documented references; • Clearer guidance on how to handle multi-fuel households in the top-20% cohort calculation; • A worked example with representative sample data, walking through the cohort identification and the weighted-average derivation. Alternatively, restrict Option 2 to projects with direct KPT evidence of pre-activity fuel consumption (effectively merging Option 2 with our proposed Option 3 above).

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23	BASELINE SCENARIO	Section 7.3, paragraphs 45–51 — Option 2 activity-level data feasibility	Under Option 2, activity participants are required to identify comparable technologies and develop activity-level efficiency distribution curves. In developing countries, it may be difficult to obtain sufficiently representative and reliable data for comparable technologies and thermal efficiencies.	If a single benchmark approach is to be selected, consider retaining the methodology-level benchmark approach under Option 1. Otherwise, maintaining both options could allow flexibility depending on activity circumstances. In addition, provide additional clarification on the basis used to determine the benchmark values for each fuel type included in the methodology.
24	BASELINE SCENARIO	Section 7.3, paragraph 45 (Table 3) — Baseline fuel consumption values	Derived from useful energy 0.001095 TJ × benchmark efficiency: wood 0.0066 TJ = 0.42 t (NCV 0.0156 TJ/t), charcoal 0.0046 TJ = 0.16 t (NCV 0.0295 TJ/t). Both values are LOW relative to field measurements typical of rural sub-Saharan Africa where actual fuelwood consumption per person/yr is widely reported in the range 0.6-1.5 t/person/yr. The factor underlying this is the 3 MJ/day useful energy assumption combined with benchmark efficiencies skewed by Jetter 2012 lab data. The compounding effect: if real field consumption is 0.7 t/person/yr and the methodology credits against 0.42 t/person/yr, the methodology systematically underrepresents baseline emissions even before downward adjustment.	Replace Table 3 baseline values with project-specific values derived from pre-activity KPT, with the central methodology values as a conservative fallback only for projects unable to conduct adequate baseline KPTs. Sensitivity analysis to be presented in the PDD comparing the project-specific value with the central default. A project-specific framework derives baseline fuel consumption from measured pre-activity KPT, not from a derivation chain anchored on a single useful-energy assumption + lab-weighted benchmark efficiency.
25	BASELINE SCENARIO	Sections 7.3–7.4 — Exclusion of pre-activity KPT from baseline	Baseline fuel consumption is determined ENTIRELY through the ambitious benchmark approach (centralized in Option 1, partly localised in Option 2). The pre-activity survey (§7.1) records cooking technology types and fuel types but does NOT feed measured baseline consumption into the baseline emissions calculation. Major divergence from established practice. The pre-activity KPT is the most direct, field-grounded measurement of baseline fuel consumption available. Excluding it forces all baselines through a centralized derivation that is inherently less accurate for any specific activity than direct measurement.	Replace Table 3 baseline values with project-specific values derived from pre-activity KPT, with the central methodology values as a conservative fallback only for projects unable to conduct adequate baseline KPTs. Sensitivity analysis to be presented in the PDD comparing the project-specific value with the central default. A project-specific framework derives baseline fuel consumption from measured pre-activity KPT, not from a derivation chain anchored on a single useful-energy assumption + lab-weighted benchmark efficiency.