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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	BASELINE SCENARIO	Section 7.3, paragraphs 53–54 — Baseline redetermination at crediting period renewal	Baseline scenario redetermined at crediting period renewal or 5 years after start of crediting period, whichever first (¶53). If a baseline stove reaches end of lifetime during the 5 years, activity may assume replacement with same-type/performance stove (¶54). (i) 5-year redetermination introduces a discontinuity in ER trajectories that complicates long-term financial planning for activities. (ii) The replacement assumption in ¶54 is favorable in the short term but interacts unpredictably with the 1%/yr downward adjustment.	Align baseline redetermination with crediting period renewal only (typically 5 or 7 years per the A6.4 framework). Within a crediting period, allow the baseline to remain stable with the explicit downward adjustment per §7.5 doing the work of accounting for baseline drift. A project-specific framework redetermines the baseline at crediting period renewal, with in-period adjustments handled by the downward-adjustment mechanism alone.
2	BASELINE SCENARIO	Section 7.4.1, paragraphs 61–65 — Usage determination Options 1 and 2	Option 1: Usage can be determined through surveys but capped at 90% if all Customer Support Actions have been followed, unless usage is monitored by SUMS, then 100% can be claimed if monitored as such. Option 2 - SUM only approach on determining device usage.	We suggest keeping both options. However, making Option 1 mandatory and Option 2 an optional approach.

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3	BASELINE SCENARIO	Section 7.4, paragraphs 62–64 — 75% / 90% survey-based caps rationale	The draft methodology proposes caps of [75 per cent] and [90 per cent] for survey-based estimation of user households depending on whether customer support actions are implemented. However, the basis for selecting these specific cap values and the relationship between the proposed customer support measures and the cap levels are not sufficiently explained.	Provide additional clarification on the basis and rationale used to determine the proposed cap values of [75 per cent] and [90 per cent].
4	BASELINE SCENARIO	Section 7.4, paragraphs 93–96 (Eq. 30–31) — Hawthorne effect HE_ind = 75%	The methodology proposes a 75% default for HE_ind (equivalent to a 25% discount on PE-side fuel savings under the survey-only pathway). We have substantive concerns with the magnitude and the asymmetry of this provision. The 75% factor is not supported by the literature cited in the methodology. In particular, findings from a 2012–13 study by Berkeley Air Monitoring Group, recently re-analyzed (BAMG 2025), did not find evidence of a strong Hawthorne effect for cookstove KPTs. The methodology should ground the proposed factor in current empirical evidence rather than older default assumptions.	Adopt a default HE_ind = 90% (10% discount), consistent with the most recent empirical re-analysis of Hawthorne effects in cookstove KPTs (BAMG 2025, building on Bensch & Peters 2013) and with what parallel methodologies have adopted on the same evidence base, until more current empirical evidence supports a different value. We strongly advocate this approach pending an evidence-collection phase during which projects using modern dMRV report actual cooking patterns before and during KPTs. Allow developers to demonstrate HE_ind > 90% with project-specific SUMs data showing that cooking patterns during the KPT period are statistically indistinguishable from non-KPT periods. Where SUMs are deployed continuously, allow Eq 31 (HE_ind = MIN(1, PCE_m/PCE_KPT)) at face value without an upper cap below 100%.

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5	ACTIVITY SCENARIO	Section 8.2.3, paragraphs 93–96; Appendix 7, Section 4, paragraph 19 — Hawthorne 75% (analysis variant)	Where SUMs are not used to measure the Hawthorne effect directly, project emissions are adjusted by HE_ind = 75% in equation 30. App.7 §4 ¶19: '75% cap on ERs when the Hawthorne effect is not directly measured is conservative based on a review of published and grey literature.' The methodology cites Berkeley Air Monitoring Group 2025 (no strong Hawthorne effect found) and Gill-Wiehl 2024 (Hawthorne effect found). (i) The 25% upward adjustment of project emissions toward the baseline is a severe default; it directly removes ~25% of the gross ER gap. (ii) The supporting literature is mixed: BAMG 2025 found NO strong effect, Gill-Wiehl 2024 found one, yet the default is set at the higher-impact end. (iii) The 75% specifically lacks empirical anchoring; it is described as 'conservative based on a review' without disclosing the quantitative basis. (iv) It forces projects to invest in SUMs to avoid the default, which adds cost.	(a) Document the empirical basis for 75% specifically (vs. 80%, 90%). (b) Provide a tiered default: 75% for projects with no direct measurement, 85% for projects with verified KPT protocol design that minimizes Hawthorne risk (e.g., extended observation, control kitchens, blind enumeration). (c) Allow projects to apply project-specific Hawthorne corrections derived from comparable KPT designs in similar contexts. A project-specific framework grounds Hawthorne corrections in measured evidence specific to the activity context, not a centralized flat penalty. The 75% default is not transparent.
6	BASELINE SCENARIO	Section 2.2(o); Section 7.4 note; Appendix 7, Section 4, paragraphs 17–18 — User household definition	User household defined as activity household with a functioning project cookstove 'in use at least [once] per week during a given monitoring period' (§2.2(o)). The once/week is bracketed pending stakeholder input. (i) Once per week is a very low threshold - a household using the project stove for one meal per week and traditional stoves for the other 13-21 meals still counts as a user. (ii) But the KPT will then measure actual fuel consumption including the stacking - so the credit attribution is correct on a fuel basis. The user definition affects only whether the household is INCLUDED in the calculation. (iii) The note in §2.2(o) acknowledges the risk that low-frequency use generates ERs partly from baseline-vs-activity-method differences rather than true reductions.	(a) Raise the threshold to a minimum that ensures the activity stove is the PRIMARY cooking technology (e.g., ≥3 uses per week, OR more than 50% of cooking events). (b) Alternatively, weight inclusion proportionally: a household using project cookstove for X% of cooking events contributes X% of the household-level baseline. (c) Disclose the expected ER impact of the threshold choice. A project-specific framework defines user-household by an empirically meaningful threshold tied to the activity's design intent (primary cooking technology), not a minimum-presence rule.

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7	BASELINE SCENARIO	Section 2.2(o); Section 7.4 note; Appendix 7, Section 4, paragraphs 17–18 — User household definition	User household defined as activity household with a functioning project cookstove 'in use at least [once] per week during a given monitoring period' (§2.2(o)). The once/week is bracketed pending stakeholder input. (i) Once per week is a very low threshold - a household using the project stove for one meal per week and traditional stoves for the other 13-21 meals still counts as a user. (ii) But the KPT will then measure actual fuel consumption including the stacking - so the credit attribution is correct on a fuel basis. The user definition affects only whether the household is INCLUDED in the calculation. (iii) The note in §2.2(o) acknowledges the risk that low-frequency use generates ERs partly from baseline-vs-activity-method differences rather than true reductions.	(a) Raise the threshold to a minimum that ensures the activity stove is the PRIMARY cooking technology (e.g., ≥3 uses per week, OR more than 50% of cooking events). (b) Alternatively, weight inclusion proportionally: a household using project cookstove for X% of cooking events contributes X% of the household-level baseline. (c) Disclose the expected ER impact of the threshold choice. A project-specific framework defines user-household by an empirically meaningful threshold tied to the activity's design intent (primary cooking technology), not a minimum-presence rule.
8	BASELINE SCENARIO	Section 7.4 — Yearly recalculation of EC_BL,j,y / EC_BL,j,y1	The notation EC_BL,j,y and EC_BL,j,y1 in the equations is not entirely clear regarding whether the baseline must be recalculated annually using updated parameters, or whether the Year 1 baseline values are carried forward (subject only to the 1% downward adjustment under Eq 13). For activity participants and validators, the answer materially affects monitoring burden, annual recalculation of H_y, fuel-mix shares, and other parameters would require an annual survey, doubling or tripling the monitoring cost relative to a Year 1-only determination.	Clarify in Section 7.4 and the variable definitions in Section 15 whether the parameters in EC_BL,j,y must be re-determined each year or whether the Year 1 values are carried forward with the downward adjustment alone. Our preferred approach: H_y and fuel-mix shares are fixed at Year 1 and reviewed only at crediting period renewal. Ψ is monitored annually via usage surveys. This keeps monitoring cost proportionate to the dynamic vs static nature of each parameter.

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9	BASELINE SCENARIO	Section 7.5, paragraphs 67–71 — 1%/yr downward adjustment of baseline	Annual downward adjustment of 1% of year-1 baseline emissions applied each year from year 2 onwards (¶68, ¶71). Justification (¶69): 'ensure that baselines remain ambitious over time, while acknowledging the economic realities of clean cooking activities.' (i) The 1% rate appears as a methodology choice without empirical derivation. (ii) Over a 10-year crediting period this compounds to ~9.6% additional baseline reduction on top of the already-discounted ambitious benchmark. (iii) The justification ('remain ambitious over time') begs the question - the ambitious benchmark is already an ambitious baseline. (iv) The adjustment increases monotonically without reference to actual market evolution in the activity geography.	(a) Empirically derive the downward adjustment rate from observed clean-cooking adoption trends in comparable contexts (e.g., from the same IEA reports cited in App.7 §6 ¶22, which document SLOW progress - implying a LOW or zero rate). (b) Allow project-specific downward adjustment based on observed local market evolution. (c) If a centralized rate is retained, justify it transparently and document the empirical basis. A project-specific framework calibrates the downward adjustment to observed market trends in the activity area, not a uniform 1%/yr applied globally regardless of actual market evolution.

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10	BASELINE SCENARIO	Section 7.5 — Downward adjustment exemption per RMP §5.1.3	As per section 5.1.3 of the RMPs of Article 6.4 (please see applicable extracts below), baseline approaches based on paragraphs 36(ii) and (iii), i.e. ambitious benchmarks and BATs, could be exempted from downward adjustments if approved by the Supervisory Body, for different reasons, including lack of economic viability due to a low or inexistent amount of reductions to be claimed. As such the methodology under assessment should clearly state such a possibility to be decide by the Supervisory Body based on proposed activities. Extracts from the RMPs: 5.1.3. Step 3: Application of the downward adjustment 2.Where baseline approaches from RMP paragraph 36 (i) or (ii) have been selected, exemptions from the downward adjustment may apply in particular circumstances, subject to the provisions in section 7.2. Where such exemptions are proposed, the proponent of the mechanism methodology shall provide appropriate justification. Section 7.2. Downward adjustment in subsequent years 65. For all three baseline approaches in paragraph 36 of the RMPs (i.e., BAT, ambitious benchmark, and existing actual or historical emissions), a downward adjustment shall apply in all calendar years following the start date of the first crediting period, unless an exemption in specific circumstances is approved by the Supervisory Body. 66. Such exemptions shall only apply to baselines based on BAT or ambitious benchmarks. Economic viability could be a consideration for exemptions, for example, where the application of a downward adjustment may result in no calculated emission reductions or net removals.	Explicitly include the possibility of claiming an exemption from downward adjustments, as per the criteria contained in Section 5.1.3 of the RMPs.

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11	APPENDIX 7	Section 7.6, paragraphs 72–73 (Table 4); Appendix 7, Section 6, paragraph 27 — Conservative BAU efficiency upper bound	Conservative BAU efficiencies set at upper bound of measured uncertainty interval: 17.1% wood (mean 11.8% + 1 SD 5.3%), 31.9% charcoal (mean 22.1% + 1 SD 9.8%), per Urban 2025. App.7 §6 ¶27: 'upper bound of the uncertainty interval relative to the central estimate'. (i) Using mean + 1 SD for the BAU efficiency embeds extreme conservatism: the implied BAU stove is in the top ~16% of measured traditional stoves. (ii) This compounds with: the ambitious benchmark approach (already conservative), the 1%/yr downward adjustment, and the fNRB 30% haircut - multiple non-independent layers acting on the same parameter chain. (iii) The 'comparison' test in §7.7 will systematically trigger BAU-overrides because the BAU efficiency is set so high that BAU emissions are correspondingly LOW - meaning the comparison rule (use the lower of adjusted baseline or BAU) frequently forces projects onto the more restrictive BAU. (iv) Urban 2025 reports the mean efficiency for household cooking; using the upper bound of measurement variability as if it were a central tendency is statistically inappropriate.	(a) Set BAU efficiency at the CENTRAL estimate from Urban 2025 (11.8% wood, 22.1% charcoal), not the upper bound. (b) Address uncertainty separately via the §11 ¶105 uncertainty analysis, not by inflating the central parameter. (c) If a conservatism buffer is required, apply it ONCE at the end of the calculation chain, not at every parameter. A project-specific framework uses central (mean or median) parameter values for the expected case, and addresses uncertainty through a defined uncertainty discount applied once. Stacking upper-bound choices at every input compounds into a non-transparent total discount.
12	APPENDIX 7	Section 7.6, paragraph 72; Appendix 7, Section 6, paragraph 26 — fNRB constancy baseline vs activity	App.7 §6 ¶26: 'in the specific context of this mechanism methodology, the uncertainty associated with these parameters does not need to be considered when determining the conservative BAU baseline … several parameters used in the calculation of baseline emissions and BAU emissions are identical, including net calorific value (NCV) of fuels, emission factors of fuels, and fNRB values of fuels (under current assumptions).' The assumption that fNRB is identical in baseline and activity scenarios is convenient but only true if the activity does NOT measurably affect local fNRB (an assumption discussed but not quantified in App.7 §7 ¶34 on 'positive leakage'). For scale activities this is increasingly questionable.	(a) Document the threshold above which activity scale could plausibly affect local fNRB (e.g., >X% of household biomass demand in a sub-national area). (b) Below threshold, retain constancy assumption. (c) Above threshold, require a sensitivity analysis on fNRB evolution and an explicit positive-leakage credit accounting if applicable. A project-specific framework explicitly addresses scale-dependent assumptions and thresholds beyond which they no longer hold.

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13	BASELINE SCENARIO	Section 7.7, paragraphs 80–82; Section 10.2, paragraph 102 — BAU comparison override	Activity must compare downward-adjusted baseline BEadj with conservative BAU baseline BAUcons. If BAUcons < BEadj, BAUcons is used (¶81, ¶82). Comparison done at PDD stage and annually. (i) Because BAUcons is constructed using upper-bound efficiencies, BAUcons emissions will frequently be LOWER than BEadj emissions - triggering the override and forcing the activity onto the more restrictive baseline. This means the 'BAU comparison' acts as an additional downward ratchet in many cases. (ii) The interaction with §10.2 ¶102 means buffer pool calculations also flip when BAUcons is the binding baseline.	Restructure the comparison: (a) use the central (not upper-bound) BAU efficiency for BAUcons construction - see row 1 above; (b) if comparison still indicates BAUcons < BEadj, investigate parameter choices rather than auto-overriding; (c) apply the override only where the divergence is material (>5%), not for any divergence. A project-specific framework treats baseline-vs-BAU comparison as an integrity check, not a default-binding floor. Override should be the exception, not the rule.
14	BASELINE SCENARIO	Sections 7.6 and 7.7 (Eq. 33), paragraphs 80–82 — BAU comparison opt-out	The BAU comparison test is one of the most operationally consequential provisions in the methodology. There should be a transparent option to opt out of the BAU comparison where the developer can demonstrate that the proposed crediting baseline is already conservative by other means. For example, where Option 3 (project-specific KPT baseline, as we propose above) is used with a documented downward adjustment, the BAU comparison becomes redundant and adds operational complexity without enhancing integrity.	Provide an explicit opt-out pathway: where the developer uses a project-specific KPT baseline (proposed Option 3) and demonstrates a downward adjustment that ensures the crediting baseline is below BAU under a defined test, the activity may be exempted from the year-on-year BAU comparison. Remove the requirement in para 102 to substitute EC_BL,UNC for EC_BL,adj in the buffer pool calculation when the cap triggers. The buffer should be calculated on the same baseline as the credits themselves (consistency principle), not against a hypothetical higher baseline.

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15	DATA AND PARAMETERS NOT MONITORED	Section 15, Data Parameters 8 and 9 — Wood-to-charcoal conversion factor (4:1 vs Urban 2026)	The 4:1 conversion factor adopted has been based largely on research from 1999 to 2003. The reference mentioned in section 5.1 (page 95) of the proposed methodology has observed a much higher value (7.1:1) as a result of much more recent (2026) research conducted by Oregon State University, Aprovecho Research Center, SunFire Energy in Malawi, and the Council of Scientific and Industrial Research-Institute for Industrial Research in Ghana. It measured wood-to-charcoal conversion rates across different kiln runs in Malawi and Ghana. The average rates were 7.3:1 in Malawi and 6.9:1 in Ghana, which is much closer to the previous IPCC-based default of 6:1 but quite far from the value suggested in this proposed methodology (4:1). The proposed methodology uses this reference to state that the 4:1 factor is conservative (in comparison with the 7.1:1 value) and that, as such, the 4:1 factor should be adopted. However, this is not consistent with accuracy and places a major unnecessary impact (40% relative impact) on the feasibility of activities. It is also worth mentioning that, under Urban et al. (2026), the authors report that as the system boundary expands to account for all mass lost during harvesting, transportation, and distribution, the conversion factor increases, reaching 9.5 kg/kg in Malawi and 10.6 kg/kg in Ghana (10.0 kg/kg overall). As such, the average 7:1 factor is already quite conservative and accurate, and there is no need to adopt the 4:1 factor, which would be both inaccurate and excessively conservative.	Change the 4:1 factor to 7:1 as per Urban et al. (2026), or at least to 6:1 (the former IPCC-based value, also adopted by the CLEAR methodology). To make it more accurate, a specific criterion could be added requesting that activity participants update the factor as more applicable references are published. This would also be a positive step toward alignment of cookstove methodologies and a more accurate, scientific outcome when measuring impact.

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16	DATA AND PARAMETERS NOT MONITORED	Section 15, Data Parameters 8 and 9 — WCCF artisanal-charcoal inconsistency	The use of a wood-to-charcoal conversion factor of 6:1 is supported by the draft methodology itself when it describes the charcoal fuel as "artisanal charcoal" in parameter tables 8 and 9. Tables 8 and 9 clarify that artisanal charcoal is produced from earth-mound kilns, which are known to reach an efficiency of 15–18% at best. However, we observed that the MEP arbitrarily decided to use a conversion factor of 4:1, calling it conservative, when it is established that the value should be between 5.8:1 and 7.1:1. We do not think it is acceptable to deny scientific research and not aim for accuracy when we can show strong and robust data to support it.	It is essential to use robust scientific facts to improve the accuracy of methodologies developed under PACM frameworks, and this includes the use of a WCCF of 6:1 in SSA and wherever earth-mound kilns are the main way to produce charcoal.

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17	DATA AND PARAMETERS NOT MONITORED	Section 15, Data Tables 4, 6, 8, 9 — Charcoal emission factors	The draft assigns charcoal the following parameters (Data Tables 4, 6, 8, 9): • EF_CO_2 (combustion): 87.9 tCO_2/TJ • EF_nonCO_2 (combustion, AR5 GWPs): 5.845 tCO_2eq/TJ • EF_CO_2,upstream: 72 tCO_2/TJ • EF_nonCO_2,upstream: 4.25 tCO_2eq/TJ These values diverge from those used in parallel methodologies covering the same physical fuel. Without alignment, two projects in the same Kenyan town distributing the same charcoal stove will produce non-comparable credits depending on which methodology they register under. On the upstream side specifically: the methodology applies a single global value of 72 tCO_2/TJ which implicitly assumes a wood-to-charcoal conversion factor (WCCF) that may not reflect SSA earth-mound kiln efficiency. Field studies of artisanal charcoal production in SSA consistently support a 6:1 WCCF, whereas more efficient industrial kilns in South America and parts of Asia operate at 4:1. A single global default fails to capture this regional reality. Additionally, the rationale for the chosen values is difficult to reconstruct from the meth text. Appendix 7 references the underlying calculations but does not show the full conversion chain from physical kiln efficiency to the upstream EF value.	Regionalise the charcoal upstream EFs based on the WCCF observed in the dominant local production technology. We propose: 6:1 WCCF for SSA and other regions where earth-mound kilns dominate; 4:1 for South America and Asia where pit kilns or industrial kilns are more common. The methodology should provide a default mapping and allow project-specific evidence where available. Publish the full derivation chain from the underlying kiln efficiency, WCCF, NCV of wood and NCV of charcoal to the final EF_CO_2,upstream value. This allows independent reproducibility. Align all charcoal emission factors (EF_CO_2, EF_nonCO_2, EF_CO_2,upstream, EF_nonCO_2,upstream) with the parallel Gold Standard CLEAR / MECD / TPDDTEC methodologies during the consultation phase, to support transparency and confidence in the carbon market.

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18	APPENDIX 5	Appendix Section 5, paragraph 22(a) — Charcoal fNRB geographic level	For charcoal, the fNRB geographic level depends on charcoal import share and parameter availability: multi-national if the host imports ≥50% of charcoal AND multi-national fNRB is lower than national; sub-national if the specific source is documented with KML; national in other cases (¶22(a)). (i) The ≥50% imports criterion creates a binary cliff: countries at 49% imports vs. 51% are treated very differently. (ii) The 'whichever is lower' rule (where multi-national < national) means projects can be forced to a less favorable fNRB. (iii) Sub-national documentation requires KML files for charcoal sourcing, which is operationally heavy and may not be feasible for activities serving urban markets supplied by distributed artisanal producers. (iv) The fNRB tool itself must publish multi-national values, which adds complexity.	(a) Smooth the ≥50% cliff: allow weighted average of national and multi-national fNRB proportional to import share. (b) Remove the 'whichever lower' override; use the applicable geographic level based on supply chain. (c) Allow alternative documentation of charcoal source (commercial records, customs data) instead of strict KML. A project-specific framework allows the geographic level of fNRB to track the actual supply chain, weighted by share, rather than binary cliffs.

19	NON-PERMANENCE PROVISIONS	Section 10 — Non-permanence (fNRB-as-buffer)	The methodology has correctly exempted project activities from monitoring GHG reservoirs, since project participants have no control over the reservoirs and observed changes in the reservoirs cannot be directly attributed to the activity. However, it is also not appropriate to require the application of the Reversal Risk Buffer Tool and, as a consequence, to determine a share of ERs to be immediately canceled. This is because there is no risk of reversals (the release of CO2 previously removed by woody biomass), conceptually speaking. In fact, the key point for emission reductions attributable to clean cooking is the assessment of the renewability of the biomass used in a project, which is properly performed through the application of the fraction of non-renewable biomass (fNRB). Such a factor is determined at a national or subnational level, based on a wide range of input parameters, including remote sensing, in a much more appropriate manner than any risk assessment performed at the activity level. Moreover, and most importantly, if a given project region is experiencing increases in the loss of carbon stocks (i.e., reversals of CO2 previously removed by woody biomass), this would result in higher fNRBs and, as such, in a higher amount of credits that could be claimed by the project activities. Thus, not accounting for such reversals renders the total ERs claimed by a project more conservative. All of these matters have been discussed by a wide range of experts under the CLEAR initiative and have been recently updated through Tool 33. Finally, as mentioned in para 40(b) (Section 8): "Because the number of A6.4ERs issued to activity participants is based on the use of efficient project cookstoves that reduce the consumption of fuelwood or charcoal, and therefore that reduce emissions from the greenhouse gas reservoir, activity participants have a direct economic interest only in actions that reduce forest emissions (rather than increase them)". In short, the adoption of improved cookstoves does not fall under the scope of a removal activity.	We suggest not to apply an additional "buffer" discount to clean cooking activities, which are not removal activities and as such not subject to the concept of a reversals "buffer". In addition, since the Reversal Risk Buffer Tool is yet unknown, it is currently difficult to make a judgement on the suggested a approach. At last, it is essential to note that the application of fNRB already serves as a major "discount" factor to ERs. For example, if an activity applies an fNRB of 49% it means it there is already a "discount" of 51% in ERs, as it can only claim for reductions on the basis of the 49% fraction (non-renewable). We suggest to consider alternatives that follow such a principle, since it represents a much wider context than the project activity.
20	NON-PERMANENCE PROVISIONS	Section 10.2, paragraph 102 — Buffer pool contribution Part 1 of 2	The draft methodology A6.4-MEP013-A02 ("Energy Efficiency Measures in Household Cooking") introduces a non-permanence framework that classifies CO_2 emission	We respectfully urge the Methodological Expert Panel (MEP) and the Supervisory Body (SB) to revise the non-permanence provisions in A6.4-MEP013-A02 to fully exempt improved

			reductions from reduced non-renewable biomass combustion as subject to reversal risk, and requires contributions to the A6.4-STAN-METH-007 ("Standard: Addressing Non-Permanence and Reversals in Mechanism Methodologies"). While the methodology does adopt a pragmatic alternative approach, exempting project participants from active monitoring and management obligations and instead mandating upfront buffer pool contributions based on a 100-year risk assessment, the fundamental categorization of these emission reductions as subject to reversal risk is scientifically contested and methodologically inconsistent with the nature of the activity. Retaining the buffer pool contribution requirement imposes a financial cost premised on the assumption that a reversal risk exists that must be pre-remediated. Improved cookstove projects reduce the quantity of biomass fuel, fuelwood or artisanal charcoal, consumed per household cooking event. The emission reduction arises from the fact that a portion of the biomass being consumed in the baseline scenario is sourced from non-renewable forest stocks. When that consumption is reduced, the net CO_2 that would have been released to the atmosphere from those non-renewable stocks is avoided. No carbon is captured, sequestered, or stored. The GHG reservoir (above-ground forest biomass) is not directly modified by the activity. This stands in clear contrast to afforestation, reforestation, and other land-based removal activities, where the activity itself changes the carbon stock of a managed reservoir and where the stored carbon can be released through fire, disease, land-use change, or other disturbances. Permanence requirements were designed for those scenarios. Applying non-permanence provisions to improved cookstove projects mischaracterizes the physical mechanism of the emission reduction and introduces transaction costs and structural disincentives that are not warranted by the underlying science. Our rationale is explained in detail below: 1 Emission Avoidance Is Not a Removal The non-permanence framework within the Article 6.4 mechanism is designed to address the risk that previously sequestered or stored	cookstove projects from buffer pool contribution requirements, and to formally recognize fNRB as the complete mechanism for addressing forest carbon risk in demand-side biomass reduction activities. The following alternative framework is proposed for consideration: 1 Full Exemption from Non-Permanence Provisions Cookstove projects operating under the scope of A6.4-MEP013-A02 should be fully exempt from all non-permanence provisions, including buffer pool contributions, because: • The activity generates avoided emissions, not removals. • No causal relationship exists between the activity and changes in the GHG reservoir. • The fNRB framework already manages the forest carbon integrity risk at the appropriate level of rigor. • The three conditions of paragraph 13 of A6.4-STAN-METH-007 are satisfied in full. 2 fNRB as the Sole Forest Carbon Integrity Instrument The fNRB parameter, applied through the approved methodological tool (A6.4-AMT-00X), should be recognized as the complete and sufficient mechanism for addressing the forest carbon risk associated with these activities. The MEP should confirm explicitly in the methodology cover note and in the relevant standard that fNRB fulfills the function of non-permanence provisions for demand-side biomass reduction activities. 3 Provision for Methodology Review Should new scientific evidence emerge regarding the attribution of forest carbon changes to cookstove activities, or should the non-permanence standard be revised to provide clearer guidance on avoided emission activities, the methodology can be updated through a scheduled review process. This preserves regulatory adaptability without imposing premature or unjustified costs on the current project pipeline.

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			carbon is re-emitted. This logic is only applicable where an activity has created a new carbon stock or has modified a reservoir to store additional carbon. Cookstove projects do neither. The emission reduction in question is the avoidance of CO_2 that would have been emitted through the combustion of non-renewable biomass. Once that biomass is not burned, the corresponding emissions do not occur. There is no stock of "saved" carbon that can subsequently be reversed. The avoided emission is permanent in the sense that the combustion event that would have caused it does not take place. Key distinction: A reversal requires that a prior sequestration or storage event be undone. In cookstove projects, there is no sequestration event. The mechanism is one of avoided emission, not removal. Applying reversal risk logic to avoided emissions conflates two fundamentally different mitigation pathways.	

21	NON-PERMANENCE PROVISIONS	Section 10.2, paragraph 102 — Buffer pool contribution Part 2 of 2	2 The fNRB Framework Is the Appropriate Risk Management Tool The fraction of non-renewable biomass (fNRB) parameter is the established methodological instrument for managing the forest carbon integrity risk in cookstove projects. It was developed precisely to address the concern that emission reductions may be overclaimed if the biomass consumed is sourced from renewable stocks. Under fNRB: • Only the non-renewable fraction of biomass consumption generates creditable emission reductions. • If biomass regeneration rates improve, effectively making the stock more renewable, the fNRB value decreases, and so do credited emission reductions. • The tool is calibrated at subnational, national, or multi-national scale using spatial modeling (e.g., MoFuSS), ensuring geographic and temporal relevance. The fNRB mechanism already performs the function that the buffer pool is intended to serve: it adjusts credited emission reductions downward to reflect the risk that consumed biomass is from a stock that will regenerate. Adding a buffer pool contribution on top of fNRB constitutes double-discounting of the same underlying risk. The prevailing understanding in the clean cooking community is that provisions on reversals are not applicable because there are no claims for removals, and that fNRB already addresses the risk of crediting reductions that are not attributable to genuinely non-renewable biomass combustion. 3 Activity Participants Have No Control Over and No Relationship to the GHG Reservoir A6.4-MEP013-A02 itself acknowledges, in Appendix 7, that the three conditions for proposing alternative approaches under paragraph 13 of the reversals standard are met: participants do not control the relevant reservoir, the reservoir is geographically distinct from the activity site, and observed changes in the reservoir cannot be directly attributed to the activity. These admissions are significant. They establish that the activity-reservoir relationship in cookstove projects is so attenuated that even the standard's own conditions for exemption are satisfied. The buffer pool, however, was designed as a mechanism for activities with a genuine causal relationship to a managed or modifiable reservoir, precisely the type of	See above response

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			relationship that the methodology's own Appendix 7 confirms does not exist here. Requiring buffer contributions in this context is structurally illogical: participants are being asked to contribute to a reserve fund to remediate reversals in a reservoir over which they have no control, no visibility, and no contractual or operational relationship. 4 The Buffer Pool Requirement Creates Moral Hazard Inversion The standard rationale for buffer pool contributions is that they create a financial incentive for participants to avoid or remediate reversals. This incentive structure only functions where participants have the ability to influence reversal outcomes. In cookstove projects, participants have no such ability. As confirmed in Appendix 7 of A6.4-MEP013-A02, participants' economic interests are already aligned with reducing biomass consumption and thus reducing emissions from the relevant reservoirs. There is no moral hazard to counteract. A buffer pool requirement in this context does not improve environmental integrity; it merely imposes a cost without a corresponding governance or risk management function. 5 Risk of Suppressing High-Impact Projects Without Integrity Benefit Improved cookstove projects are among the most scalable, cost-effective, and socially beneficial mitigation interventions available, particularly in sub-Saharan Africa and South/Central America. They address SDG 7 (affordable and clean energy), SDG 3 (health), SDG 5 (gender equality), and SDG 13 (climate action) simultaneously. Many countries have prioritized clean cooking in their Article 6 strategies, and unnecessary methodological barriers effectively exclude these countries from meaningful participation in the Paris Agreement's market mechanisms. K	

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22	NON-PERMANENCE PROVISIONS	Section 10.2 — Non-permanence (Gold Standard parallel-regime precedent)	Furthermore, recently the Gold Standard released their new suite of Paris aligned clean cooking methodologies in which the following is stated with regards to their treatment of non-permanence in clean cooking programs: "In the context of decentralized thermal energy service activities, the activity developer operates the technology distribution and data management infrastructure but possesses no legal control, land tenure, or management authority over the physical greenhouse gas reservoir (the forest or land area). Consequently, the activity is formally classified under the "No Control" exemption regarding the carbon reservoir. Non-permanence buffer pool deductions are therefore fundamentally inappropriate for avoidance activities applying this methodology and shall not be required."	Aligned to ensure scientific consensus is reflected in all methodologies.

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23	EMISSION REDUCTIONS	Section 11 — Emission reductions, cumulative effect	The requirements set out in the draft methodology risk creating a compounding effect through multiple overlapping requirements and adjustments included to ensure conservativeness, including the use of global defaults in the ambitious benchmark based baseline (Option 1, paragraph 45, Table 3). When combined with the stringent applicability conditions, we are concerned that the methodology, in its current form, does not provide sufficient incentives for LDCs and SIDS to benefit from clean cooking carbon projects, contrary to the objectives and spirit of the RMPs - which explicitly require the Supervisory Body to recognize the special circumstances of LDCs and SIDS (Decision 3/CMA.3, annex, paragraphs 29 and 39) and to encourage their participation in the mechanism (Decision 3/CMA.3, paragraph 5(f) and (g)). An individual PDForum member has submitted an excel based analysis applying the methodology's benchmark approach to charcoal-based projects. We quote this analysis's conclusion that the methodology reduces crediting potential from approximately [0.48 tCO2e/stove] under CDM AMS-II.G v.14 to approximately [0.16 tCO2e/stove], even before accounting for further reductions associated with contributions to the buffer pool, OMGE, and the Adaptation Fund. At current market price for these project types in voluntary and compliance carbon markets, projects are unlikely to remain financially viable under the level of reduction in crediting potential implied by the methodology.	To this effect, we request the MEP to consider: 1. Allowing alternative nationally appropriate benchmarks to be proposed by project developers and/or DNAs, where well-evidenced; 2. Reconsidering the application of the baseline downward adjustment.; and 3. Taking into account our comments related to the treatment of permanence.

24	EMISSION REDUCTIONS	General — Cumulative effect of conservative provisions	A6.4-MEP013-A02 applies multiple layered conservatism mechanisms to the same activity. Each is individually defensible, but cumulatively they produce a substantial reduction in credit yield versus equivalent projects under CDM AMS-II.G or MMECD V1.2 for the same physical fuel savings. Stacking the deductions for a typical SSA charcoal project: • Use of ambitious benchmark instead of measured baseline: ~10–20% reduction • Ψ cap at 75% (vs measured 80–90% in field data): ~10–18% reduction • Mandatory Hawthorne adjustment (25% default cap on PE-side savings): ~15–20% reduction • 1% annual downward adjustment of baseline (Eq 13): ~1–4% cumulative over 5 years • BAU comparison cap (Eq 33, para 81–82), binding for most charcoal projects: ~15–20% reduction • Reversal Risk Buffer pool contribution (TBD): expected 5–10% reduction • Share of Proceeds (SOP) 5% + OMGE 2%: 7% reduction Several mechanisms address the same underlying concern (uncertainty about real-world stove use), but the methodology applies them in parallel without acknowledging the compounding effect. The cumulative result is a credit yield that is difficult to defend on technical grounds, not because each individual provision is unreasonable, but because there is no analysis of the joint effect. We strongly believe that reliance on measurement should be the methodology's primary anchor for project performance. Discounts based on assumed efficiency or assumed useful energy create distance between the credited reductions and the underlying observed reality, and reduce confidence among prospective buyers who increasingly conduct independent due diligence. Of particular concern is that several mechanisms are bracketed or governed by tools still under development. A developer cannot today know whether the net effect on their specific project will be sustainable for the business case, which is a substantive deterrent to investment in new cookstove activities under Article 6.4, at a time when the sector should be expanding access to clean cooking.	Publish a transparent sensitivity analysis showing the cumulative effect of all conservative provisions in the methodology, applied to a representative set of project archetypes (Kenya charcoal, Nigeria wood, Bangladesh wood, etc.). BURN can contribute representative project datasets to this exercise. Apply a "substitution rule" for overlapping provisions: where two or more provisions address the same underlying uncertainty (the Ψ cap and the Hawthorne adjustment both address the gap between observed and actual usage; the BAU cap and the downward adjustment both address baseline drift over time), allow developers to apply the more conservative of the overlapping provisions rather than stacking them. This is consistent with standard regulatory practice on non-cumulative discounting where two safeguards address the same risk, and preserves environmental integrity while removing arbitrary compounding. Specifically: if a developer deploys SUMs that allow Hawthorne measurement via Eq 31 (HE_ind = MIN(1, PCE_m/PCE_KPT)), waive the Ψ survey cap and allow the use of SUMs-measured usage at face value. The SUMs data already addresses the underlying concern. Anchor the methodology in measurement rather than assumed defaults. Where project-specific empirical data are available and meet statistical reliability requirements, allow them to be used directly. Where they are not available, default to the methodology values, but do not impose the methodology values when better data exists.
25	EMISSION REDUCTIONS	Section 11, paragraph 105 — Uncertainty analysis necessity	The draft methodology introduces an uncertainty analysis requirement at a [95%][90%] confidence level. The	Consider whether additional uncertainty analysis under paragraph 105 is necessary

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			methodology already includes several conservative approaches, including Hawthorne effect adjustments, user household caps, and ambitious benchmark approaches.	where conservative approaches are already applied within the methodology.