



CALL FOR INPUT

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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	APPENDIX 3	Appendix 3, Section 4, paragraph 14 — Determination of sample size	Paragraph 14 of Appendix 3 (on Determination of sample size) references a footnote but the corresponding footnote number is not provided in the text we received. We see the footnote referenced as number 3 in this paragraph, which should be made explicit.	Verify and explicitly insert the footnote number in paragraph 14 of Appendix 3, and confirm the cross-reference resolves to the correct supporting document.
2	DEFINITIONS	Section 2, paragraph 20 — Methodology validity to 31 December 2030	The methodology validity expires 31 December 2030, with the rationale that this aligns with the 10-year cookstove technical lifetime assumption. However, projects considering registration in 2026 face a substantive uncertainty: a project registered in 2026 with a 5-year renewable crediting period would have its first renewal in 2031, by which time the methodology will no longer be valid. This uncertainty is a deterrent to investment. Carbon project finance typically depends on multi-period crediting visibility, and a methodology that expires before the second crediting period of projects registered under it creates pricing risk that prospective buyers will discount.	Provide a clear statement from the Supervisory Body on the transition path: (i) will A6.4-MEP013-A02 be extended past 2030; (ii) will a successor methodology be developed and harmonized so existing projects can migrate; or (iii) will projects registered under v01.0 retain its provisions through to their natural crediting period end-dates? Commit to publishing the successor methodology framework by no later than December 2029, allowing developers and prospective buyers to plan for the transition.

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3	DATA AND PARAMETERS NOT MONITORED	General — Alignment with parallel methodologies (CLEAR / GS / Verra)	It is difficult to understand the need to develop an entirely new methodology framework when CLEAR (A6.4-PMM004) exists and has been submitted for clean-cooking Article 6.4 projects. Alignment between A6.4-MEP013-A02 and CLEAR, along with Gold Standard RECH/MECD and Verra VMR0050, would be highly beneficial for the market as a whole. A comprehensive methodology using defaults that are aligned between standards would deliver three substantive benefits: • Credits from the same physical activity are fungible across registries, making due diligence by prospective buyers more efficient; • Validators can audit against a consistent technical baseline rather than reconciling different parameter values for what is physically the same activity; • Developers can build pipelines and project finance structures without facing standard-specific methodological lock-in. We also note that a second methodology revising AMS-I.E. is being developed for fuel-switching, which will further fragment the methodology landscape. In our view, this proliferation of methodologies for similar applications is not beneficial, the market is better served by fewer methodologies, better aligned, with clearly justified differences.	Coordinate technical parameter setting (charcoal CO₂ and non-CO₂ EFs, charcoal upstream EFs, WCCF, NCVs, sampling reliability targets, Ψ cap level, Hawthorne adjustment factor) with the Secretariats of Gold Standard and Verra during the consultation phase. Where a parameter is physically the same across methodologies (e.g., the IPCC-derived NCV of charcoal, the WCCF for SSA earth-mound kilns), publish the chosen value with a transparent reference and explicitly signal alignment in the rationale text of Section 15. Where A6.4 deliberately adopts a more conservative value than parallel methodologies, state this explicitly and provide the underlying empirical justification (not just “conservativeness” in general). For the forthcoming fuel-switching methodology, anticipate harmonization with A6.4-MEP013-A02 on shared parameters, especially for projects involving fuel stacking (e.g., an improved biomass stove plus an LPG or induction stove in the same household).

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4	DATA AND PARAMETERS NOT MONITORED	General — Draft status and dependencies on tools not yet adopted	Several core elements of A6.4-MEP013-A02 are governed by tools that are themselves still under development by the Supervisory Body, including the Sampling and Surveys Tool, the Reversal Risk Assessment Tool, and the fNRB methodological tool. The methodology also contains a substantial number of bracketed [] values, including the Ψ cap (75% vs 90%), the Hawthorne default (75% for HE ind), and provisions in paragraphs 77 and 81. In its current form, an activity participant cannot fully execute the methodology because the inputs required by paragraphs 100–102 (buffer pool contribution) and Appendix 4 (sample size determination) are not yet quantifiable. This makes it difficult for developers to make investment decisions, and difficult for prospective buyers to understand the credit volume profile of projects developed under this methodology.	Publish, alongside the final methodology, a consolidated table of all the dependent tools and the bracketed values, with the expected timeline for their resolution. In the interim, provide indicative default values for the Reversal Risk Buffer fraction (F_{buffer}) and the sampling reliability targets, so that developers can model project economics and prospective buyers can price the resulting credits with reasonable certainty. Clarify whether activities registered under v01.0 will be required to update their PDD if the underlying tools change values materially, and whether vintages already issued would be retroactively affected.