



CALL FOR INPUT

Name of submitter	Abhishek Mahawar
Affiliated organization of submitter	Bodhi Hub Private Limited
Email of submitter	abhishek.m@bodhi-hub.com
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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	COVER NOTE	Paragraph 17	“Relevant greenhouse gas reservoirs for both the baseline and activity include above ground forest biomass, as this is assumed to be the primary source of harvested biomass.” It is not clear why there is a restriction of aboveground forest biomass. Why aboveground out-of-forest (other protected land is not included in the geographical limit.	None
2	INTRODUCTION	Para 5	One of the key reason for outdated methodology in CDM was no periodic revision of the methodologies. The onus of revision of the CDM methodologies was put on the stakeholder instead of pro-active periodic review. Fixed periodic review of the methodology in PACM is appreciated but 5 years is a very long period. Considering the ever-evolving nature of the project design and the methodological requirements, it shorter interval for periodic review of the methodology would be preferable.	The validity of the methodology shall be restricted to 3 years instead of 5 years. “This mechanism methodology remains valid for 3 years...”

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3	DEFINITIONS	Para 7(d)	Definition of Cooking event suggests inclusion of all types of events like cooking meals, beverages or heating water. This can create inaccuracy in the KPT results as all these events are not of comparable nature and vary on multiple dimensions like time of cooking, energy need, number of persons served, etc.	We propose that the definition of cooking events shall be restricted to full meal preparation and exclude all other peripheral cooking activities.
4	DEFINITIONS	para 7(f)	The definition of fNRB - “the proportion of harvested bio-mass that exceeds the natural rate of regeneration of the landscape during a given period” – does not fit with the notional concept it associates with.	The following definition may seem more appropriate: “the proportion of biomass harvest that contributes to the continuous degradation of the accessible above-ground biomass of the reference landscape during a given period.”
5	DEFINITIONS	7(o)	It would be scientifically inaccurate to claim emission reductions for 1 day of usage of project device out of 7 days (or 21 meals). The exact number shall be determined through statistical significance rather than assigning arbitrary numbers. PACM secretariat shall take help of statisticians to determine the minimum threshold for ensuring high significance of fuel quantity with the project intervention. In the crudest understanding of statistics, our 1st guess would be to set a threshold atleast 50% usage of the project device.	None
6	DEFINITIONS	7(o)	The ratio of Wood-to-Charcoal is very conservatively defined at 4 which is undermining the reality. As the methodology has defined the charcoal as artisan grade charcoal prepared in traditional earth mound kilns using primitive methods, it is unrealistic to achieve 25% charcoal yield under such conditions. Such a yield means energy efficiency of the process being 45%, which is highly unrealistic in the prevalent ground conditions and systems. A more realistic yet conservative assumption would be to consider a factor of 6 for wood-to-charcoal conversion (energy efficiency = 31.5%) which has been reported by many independent published research papers. The charcoal used in baseline, produced via other industrial processes, shall be excluded from the eligibility under this methodology.	The ratio of wood-to-charcoal conversion corrected to 6.0.

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7	APPLICABILITY	12	The whole of Sub-saharan Africa relies on fuel and stove stacking. The methodology does not provide sufficient clarity on how this eligibility requirement would be accounted in such households. If these households are excluded then the methodology is ignoring majority of the needy households.	None
8	DEFINITIONS	13(c)	The definition/identification of the geographical area is missing in the draft methodology.	None
9	APPLICABILITY	13(d)	Eligibility based on Poverty index, after restricting the applicability only to rural areas, is over-killing it. It would be a travesty of policy if the policymakers believes 75% of the households may use traditional biomass and artisan stoves out of their own choice in spite of the good income levels. It is almost impossible to find any sizable geographical area in any Asian country which would qualify under these stringent conditions. Even if they become eligible, low fNRB will make them unviable to implement. 50% of Asian, dependent on biomass, would be deprived of access to carbon finance entirely. This seems counterproductive unless the policy objective is the deprivation of carbon finance for majority. The determination of MPI threshold as 0.2 also seems arbitrary without any justifiable basis. This will exclude, whole or majority of Nepal, Phillipines, India, Kenya, Rwanda, Namibia, Senegal, - all of these need significant carbon finance for transition, especially in the rural areas.	None

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10	APPLICABILITY	13 (i)	The guardrails to uphold integrity of such efficiency tests are very weakly defined. It has been observed that the tests depict significant variation of results in the repeated tests in 3 different modes (High, Medium, Low/Simmer) and may be yielding inaccurate results when performed internally or by unaccredited laboratory. The threshold for project device efficiency seems to be very low and may fail to allow reliable significance of emission reduction with the project emissions. The rural markets have long back rejected marginal improvements in fuel usage; instead they look for significant advancement in smoke reduction, fuel consumption and convenience.	None
11	ACTIVITY SCENARIO	para 62-63	It would be unreasonable to provide comparable benefits to both the scenarios – SUM monitoring (highly resource intensive) and survey based usage, along with customer support system – as survey based results are more prone to errors and manipulation. A significant penalty shall be applied to ensure high standards of monitoring.	We propose to cap the results to 40% in case of baseline surveys.