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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)**				
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1	NON-PERMANENCE PROVISIONS	Section 10 - non permanence	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 request the application of the Reversal Risk Buffer Tool and, as a consequence, to determine a share of ERs to be immediately cancelled. 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), such a fact 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 render the total ERs claimed by a project more conservative. All of such 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 40b (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 aplication 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.
2	INTRODUCTION	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	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

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			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.	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.

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3	NORMATIVE AND INFORMATIVE REFERENCES	General, Alignment with parallel methodologies	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 CO_2 and non-CO_2 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 harmonisation 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	APPENDIX 7	Cover Note par 14, par 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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5	NON-PERMANENCE PROVISIONS	3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)"	The Project Developer Forum have shared a Stakeholder Communication Form to the Chair of the Supervisory Body on the 4th of February 2026 addressing the use of Permanence and fNRB in clean cooking projects. A link to the document can be found here: https://docs.google.com/document/d/1DqaXql8_ZpeLvu1Yo7KhtVAandXr_XyY/edit?usp=drive_link&ouid=105686326439109719997&rtpof=true&sd=true	-

6	APPLICABILITY	4.11. (c)	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 Journal of Development Economics 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. Amother study, Batchelor et al. (2021) (in Energy Research & Social Science) find 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. Ssekimpi et al. (2022) (BMC Public Health) document that 89% of households in an informal urban settlement in 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 (inexhaustive list) Ravallion et al. (2007). On the Urbanization of Global Poverty. Journal of Development Economics. ScienceDirect 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 Ssekimpi et al. (2022). Biomass fuels and indoor air pollution in urban Uganda. BMC Public Health. PubMed"	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 to or financial means to adopt cleaner cooking alternatives. This preserves the methodology's integrity while ensuring it reaches all households for whom it was designed.
7	BASELINE SCENARIO	7.1.1, Par 38a - Exclude carbon projects from the baseline	The adoption of improved cookstoves based on carbon finance should not be part of the baseline, since it does not represent the	Keep paragragh 38 a, i.e. (a) [Exclude technologies installed under another activity

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			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.	registered under another carbon crediting scheme";]
8	BASELINE SCENARIO	7.2, Selection of the baseline approaches from paragraph 36 of the RMPs	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 VMR0006, 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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9	BASELINE SCENARIO	7.5 - Downward adjustment	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 donward adjustements 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 claming for an exemption of downward adjustments, as per the creteria contained in Section 5.1.3 of the RMPs

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10	BASELINE SCENARIO	7.6, 7.7 / Eq 33 / Para 80–82, BAU comparison and 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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11	DATA AND PARAMETERS MONITORED	Section 15 - Data parametesr 8 and 9 - wood to charcoal conversion factor	The 4:1 conversion factor adopted has been mostly based 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 Research-Institute for Industrial Research in Ghana. It has measured wood to charcoal conversion rates in different kiln runs in Malawi and Ghana. The average rates were 7.3 to 1 in Malawi and 6,9 to 1 in Ghana, which is much closer to the previous IPCC based default of 6:1 but quite far from the proposed value suggested in this proposed methodology (4:1). The proposed methodology uses such a reference to state that the 4:1 factor is conservative (in comparison with he 7.1:1 value) and 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. Also, it is 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 research registered increases in the conversion factor, 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, 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 to 7:1, as per Urban et al 2026 or, at leaset to 6:1 (former IPCC based value, also adopted by the CLEAR methodology). To make it more accurate, a specific criterion could be added requesting activity participants to update the factor, as more applicable references are eventually published.