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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 6 — Baseline Setting / Step 1	Under Option 1, the baseline wood fuel consumption is fixed at 0.42 tonnes per person per year, derived from a benchmark efficiency of 16.6% applied to a standardised useful energy assumption of 0.001095 TJ per person per year. The equivalent charcoal figure is 0.16 t/person/year at 23.6% efficiency. These values are deeply conservative relative to comparator frameworks: • CLEAR (PNM004): default 0.50 t/person/yr wood; cap 2.0 t • TPDDTEC v5.0 (Gold Standard): MSL default 0.475 t (before 5% deduction); B-KPT cap 0.95 t • VM0050 (VCS): KPT-derived; no fixed cap beyond cross-checks In our ER modelling, replacing a KPT-derived VM0050 baseline with the A6.4 Option 1 benchmark accounts for an 80.8% reduction in gross ERs — by far the largest single driver of the overall 89% A6.4 haircut. For a project where actual measured household consumption is 0.9 t/yr (not unusual in intensive biomass-cooking contexts in rural Sub-Saharan Africa), the methodology credits less than half the real emission reduction achieved. The 0.42 t figure is derived from a modelled benchmark efficiency (16.6%), not from empirically observed average consumption in the low-income, rural, ≥75%-biomass-cooking populations the methodology targets. The ambitious-benchmark philosophy is a valid UNFCCC standard requirement, but the benchmark must be empirically grounded in the actual performance distribution of baseline stoves in eligible populations — not derived from a modelled efficiency assumption applied to a standardised useful energy figure.	We propose the following amendment to Table 2: • Wood benchmark baseline: 0.50 t/person/yr (aligned with CLEAR default and above TPDDTEC MSL default, providing conservative but empirically defensible crediting baseline) This value remain consistent with the ambitious-benchmark standard while reducing the methodological gap with CLEAR and TPDDTEC to a proportionate level. This proposed change should be adopted alongside comment 2.

2	BASELINE SCENARIO	Section 6 — Baseline Setting / Step 1 ¶22–35; Table 2; comparison with CLEAR, VM0050 ¶, TPDDTEC v5.0 (B-KPT / Type A baseline)	The methodology removes kitchen performance testing (KPT) entirely as a mechanism for measuring baseline fuel consumption. Under Option 1, the baseline is fixed at a methodology-level benchmark (0.42 t/person/yr wood). Under Option 2, it is derived from a top-20% performance distribution — also a modelled construct. Neither option permits a project proponent to measure actual baseline fuel consumption through a field KPT survey and use that measurement as the crediting baseline. This is a fundamental departure from all three comparator frameworks: • VM0050 (VCS): KPT is the primary baseline measurement mechanism, with mandatory cross-checks against published data. No fixed benchmark applies. • CLEAR (A6.4-PNM004): Two routes — KPT survey OR global default with caps/flags. Projects with KPT capacity are actively encouraged to measure rather than default. • TPDDTEC v5.0 (Gold Standard): B-KPT (Type A) is the primary route for all large-scale activities; it permits baselines up to 0.95 t/person/yr wood where field data supports it. The practical consequence of eliminating KPT-based baselines is that projects operating in contexts where actual measured household consumption is materially higher than 0.42 t/person/yr — common across rural Sub-Saharan Africa — cannot credit the real emission reductions they achieve. A project in a context where measured baseline consumption is 0.9 t/person/yr is constrained to credit against less than half that figure. The methodology therefore systematically under-credits real-world impact. KPT is the gold standard for measuring actual household fuel consumption under field conditions. It is internationally recognised (ISO 19867-3, Clean Cooking Alliance protocol), used as the primary monitoring tool for project KPT across all four methodologies, and is the established basis on which the broader cookstove sector has developed. Excluding it from the baseline without compelling methodological justification — when all comparator frameworks retain it — undermines both credibility and environmental integrity. A methodology that credits less than the real reduction achieved does not serve the UNFCCC's objective of	Introduce a KPT-based baseline route as Option 3 in the baseline determination framework, modelled on VM0050's KPT approach with the CLEAR-style caps and flags applied to guard against over-crediting: "Option 3 — KPT-derived baseline: Where a statistically representative baseline KPT survey is conducted in accordance with the A6.4 Sampling and Surveys Tool (or equivalent) prior to project registration, the project proponent may use the mean measured household fuel consumption per person per year as the crediting baseline, subject to the following constraints: (a) The KPT-derived baseline shall not exceed [1.0 t/person/yr] for wood or [0.40 t/person/yr] for artisanal charcoal (flag values aligned with CLEAR); (b) Where the KPT-derived value exceeds [0.75 t/person/yr] wood or [0.20 t/person/yr] charcoal, a conservative downward adjustment of [10%] shall be applied; (c) The KPT survey shall achieve a minimum confidence/precision of 95/10 and cover a statistically representative sample of the eligible population in the project area; (d) The KPT-derived baseline shall in all cases remain below the Conservative BAU baseline determined under Section 7.6 (BAU_cons,y). This ceiling ensures compliance with paragraph 33 of the RMPs and removes any concern that an empirical baseline could exceed the conservative envelope; (e) The baseline shall be reassessed via KPT at each crediting period renewal. Option 3 shall not be available concurrently with Option 1 or Option 2; the project proponent must select and document their chosen option at validation." This addition is consistent with the UNFCCC's own Recommendation for Methodologies and Procedures, which permits activity-level data where it can be shown to be more accurate than standardised defaults, and with the CLEAR methodology that the MEP drew upon in developing this draft.

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			scaling genuine climate action. This position is independently supported by the Project Developer Forum's consultation submission (May 2026), which states: "there is no measurement approach offering better accuracy than properly conducted project-level KPTs combined with rigorous protocol adherence" and makes an identical request to introduce a KPT-based Option 3. The convergence of multiple independent operators on this point reflects a sector-wide consensus that measured data, where available, should take precedence over modelled defaults.	
3	BASELINE SCENARIO	Section 6 — Baseline Setting / Step 1 ¶29–34; Option 2 (activity-level top-20% performance distribution)	Option 2 — the activity-level pathway that allows derivation of the baseline from a top-20% performance distribution of stoves actually in use in the project area — is more aligned with real-world conditions and the ambitious-benchmark principle. However, the conditions for accessing Option 2 are not clearly defined in the current draft. Without clear access criteria, project developers in data-rich environments with established KPT programmes may default to Option 1 (which may be more conservative than necessary) or face uncertainty at validation. Option 2 should be the default for projects with KPT capacity, not a special case requiring implicit justification.	Clarify the access criteria for Option 2 explicitly in the methodology text. We propose the following addition after ¶29: "A project proponent may apply Option 2 where: (a) a baseline KPT survey of the performance distribution of traditional stoves in the eligible population has been conducted in accordance with ¶XX prior to project registration; and (b) the survey sample is statistically representative of the project area and covers at least [100] household-stove pairs. Option 2 shall be available to any project proponent meeting these criteria. There is no requirement to demonstrate that Option 1 would yield a lower baseline before applying Option 2. The top-20% performance benchmark derived under Option 2 shall be used in place of the methodology-level values in Table 2, subject to the useful energy ceiling.

4	BASELINE SCENARIO	Section 6 — Baseline Setting / Step 1 ¶36–40; Equations 9–12 (Conservative BAU baseline and dual-baseline comparison)	The methodology introduces a unique dual-baseline construction not found in CLEAR, VM0050 or TPDDTEC. In addition to the benchmark-derived baseline, it establishes a separate Conservative BAU baseline (using BAU efficiency of 11.8% wood / 22.1% charcoal with upper-bound uncertainty interval). The final crediting baseline must always be the lower of the two (Equation 12: BE_y = MIN(BE_adj,y, BAU_y)). In our modelling, this BAU ceiling imposes a further −9.7% reduction on the already-compressed benchmark baseline, compounding conservatism without a clear methodological rationale. No other framework applies a dual-minimum construction of this type. Additionally, from Year 2 a flat 1% per annum downward adjustment is applied to the baseline regardless of whether any policy change is occurring in the host country. TPDDTEC's Downward Adjustment Factor is tied to the host country's net-zero pathway. A flat annual ratchet unrelated to policy reality progressively erodes the economic case for long-term programme investment without serving an identifiable environmental integrity purpose. Critically, both the BAU ceiling and the annual downward adjustment address the same underlying concern — that the crediting baseline should not drift above a realistic representation of counterfactual emissions. Applying both in parallel, without acknowledging their overlapping purpose, results in a double-safeguard structure that the methodology's own design does not justify. Standard regulatory practice where two provisions address the same risk is to apply the more conservative of the two, not to stack them. We also note that the UNFCCC's own Rules, Modalities and Procedures for the Article 6.4 mechanism (RMP §5.1.3 and §7.2) explicitly provide that exemptions from the downward adjustment may apply for ambitious benchmark baselines on economic viability grounds, subject to Supervisory Body approval. The methodology makes no reference to this exemption pathway despite its direct relevance to the projects within scope.	1. Dual-baseline construction: Remove the Conservative BAU ceiling (Equations 10–12) as a mandatory cap on the benchmark baseline. If the MEP wishes to retain the BAU comparison, it should be used only as a transparency-reporting requirement (requiring disclosure of the gap between BAU and crediting baseline) rather than as a binding constraint on credit volume. 2. Downward Adjustment Factor: Replace the flat 1%/year DAF with a country-specific DAF derived from a published national clean-cooking policy trajectory tool, consistent with the approach in TPDDTEC v5.0. Where no country-specific tool value is available, the default DAF should be 0% (no downward adjustment) rather than 1%, reflecting the absence of evidence of policy-driven baseline change. 3. Exemption pathway: The methodology should explicitly reference the exemption provision at RMP §5.1.3 / §7.2, which permits the Supervisory Body to grant exemptions from the downward adjustment for ambitious benchmark baselines where economic viability is at risk. Given that this methodology is the sole Article 6.4 pathway for its target project category and the cumulative conservatism of its design, the exemption provision is directly relevant and should be accessible to activity participants. Proposed amendment to the DAF provision: "Where a country-specific Downward Adjustment Factor is published in the applicable UNFCCC DAF tool, that value shall be applied. Where no country-specific value is available, the default DAF shall be zero (0%), and the project proponent shall note this in the monitoring report with a qualitative assessment of relevant national policy developments. Activity participants may apply to the Supervisory Body for an exemption from the downward adjustment in accordance with RMP §5.1.3, where the activity demonstrates that the downward adjustment materially impairs economic viability."
5		¶17; Table 1; Equation 33; Appendix 7 §8; Reference tool A6.4-AMT-XXXX	The methodology imposes a mandatory buffer pool deduction on the CO_2 portion of emission reductions associated with	The MEP / Supervisory Body should publish a draft version of the Reversal Risk Assessment Tool (A6.4-AMT-XXXX) — including illustrative

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	NON-PERMANENCE PROVISIONS	(document number unassigned)	displaced fuelwood and artisanal charcoal (Equation 33). The buffer percentage (F_buffer) is wholly determined by a separate Reversal Risk Assessment Tool (A6.4-AMT-XXXX) that has not been published — the document number itself is unassigned in the current draft. This creates a material commercial uncertainty: project developers cannot model project economics, assess financial viability or make pipeline investment decisions without knowing the likely buffer range. Based on analogous AFOLU buffer tools, we estimate F_buffer at 10–25%, implying a 10–12% reduction in total project ERs at typical Sub-Saharan African fNRB values. This is compounded by the fact that the buffer pool deduction is layered on top of an already severely compressed baseline (see Comment 1), making it particularly consequential. Justification for change: The UNFCCC Supervisory Body's own transparency and due process standards require that all tools and instruments referenced in a methodology under consultation be available to stakeholders during the comment period. Publishing a draft tool alongside a draft methodology is standard practice in the voluntary market. Failure to do so prevents meaningful stakeholder engagement on the single most commercially uncertain provision in the methodology.	F_buffer outputs for representative Sub-Saharan African, South/South-East Asian and Latin American project contexts — alongside this methodology during the consultation period, or extend the consultation window until the tool is available. Proposed addition to ¶17 (or as a footnote to Equation 33): "The Reversal Risk Assessment Tool (A6.4-AMT-XXXX) shall be published for stakeholder review no later than the opening of the public consultation on this methodology, so that project developers may assess the commercial implications of the buffer pool provision."

6	NON-PERMANENCE PROVISIONS	Section 5 — Non-permanence (Reversal Risk) ¶17; Table 1; Equation 33; Appendix 7 §8	We object to the conceptual basis of applying a buffer pool to cookstove emission-reduction projects. The methodology classifies the CO_2 reductions associated with displaced non-renewable biomass as a 'reservoir subject to reversal risk' on the grounds that avoided forest depletion cannot be regarded as permanent because the trees not cut down remain standing and exposed to future loss (fire, drought, pest). This framing is incorrect for an emission-reduction activity. Cookstove projects generate credits from avoided combustion of biomass — not from sequestration of carbon in forest stocks. The fNRB parameter already incorporates a forward-looking, risk-adjusted assessment of which fraction of the biomass supply is non-renewable; it does not credit the project for trees that will regenerate naturally. Applying a buffer pool on top of an fNRB-adjusted ER stream double-counts the same underlying permanence risk. On the specific forest-fire scenario: if standing trees are destroyed years after a project ends, those emissions occur regardless of whether the cookstove project ran. The counterfactual without the project also involves trees standing and exposed to fire. The project's contribution is to reduce the rate of harvest during the crediting period; that avoided harvest is not reversed by a subsequent fire. The Gold Standard TPDDTEC v5.0 (December 2025) explicitly concludes that no buffer pool is required precisely because cookstove activities 'have no control over the reservoir' — the same framing the MEP invokes, but reaching the opposite conclusion. The MEP's Appendix 7 does not engage substantively with TPDDTEC's December 2025 reasoning. The Integrity Council for the Voluntary Carbon Market (ICVCM) has reached the same conclusion. In its Board Observations on Cookstoves and Biodigesters (March 2025), the ICVCM stated that "methodologies may not directly measure and address reversal risks because emission reductions are derived from energy displaced or saved, rather than from maintaining biomass stocks." The ICVCM's assessment process considered numerous viewpoints before reaching this conclusion, making it the most authoritative independent	Preferred outcome: Remove the buffer pool from the ER calculation for cookstove emission-reduction projects, consistent with Gold Standard TPDDTEC v5.0 §12.3.1, the CLEAR framework, and the ICVCM Board Observations on Cookstoves and Biodigesters (March 2025). Alternative outcome (if the MEP retains a non-permanence provision): Replace the prospective buffer pool with a continuity-of-practice assessment at each crediting period renewal. At renewal, the project proponent demonstrates that the fNRB values underpinning issued credits remain valid (i.e., forest stocks in the project area have not been materially depleted). If fNRB values at renewal demonstrate stock recovery beyond original assumptions, a corresponding downward adjustment to forward credits would apply — consistent with the methodology's own requirement to redetermine fNRB at crediting period renewal. Proposed replacement for Equation 33 and associated text: "At the time of each crediting period renewal, the project proponent shall demonstrate, using updated fNRB values from the applicable A6.4 fNRB tool, that the non-renewable biomass fractions underpinning previously issued A6.4ERs remain valid. Where updated fNRB values are lower than those used in prior crediting periods, the difference shall be applied as a prospective downward adjustment to the crediting baseline for the renewal period. No retrospective cancellation of issued A6.4ERs or contribution to a Reversal Risk Buffer Pool is required."

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			statement on this question available. The Project Developer Forum's May 2026 consultation submission — representing multiple large-scale cookstove operators — independently makes the same conceptual argument and urges full exemption from buffer pool requirements. The convergence of Gold Standard, the ICVCM and the Project Developer Forum on this point reflects a clear and consistent market position that the MEP's Appendix 7 rationale does not adequately address.	

7	EMISSION REDUCTIONS	Section 8 — Monitoring and Verification / Hawthorne Effect ¶78–82; Equation 28 (HE_ind default [0.75]); Appendix 7 §5	The methodology applies a default Hawthorne effect indicator (HE_ind) of [0.75], meaning 25% of the estimated project-baseline fuel consumption differential is added back as a project emissions adjustment for projects measuring consumption via KPT alone without SUMs. In our modelling, this removes a further 25% of ERs at the post-baseline, post-fNRB stage — the third largest single driver of the total haircut. The MEP itself acknowledges in Appendix 7 that the evidence base for the 25% default is mixed: a 2012–13 Berkeley Air Monitoring Group (BAMG) study did not find evidence of a strong Hawthorne effect; other studies did. Despite this uncertainty, the methodology applies the most conservative reading of a contested evidence base as a fixed default. Critically, that same Berkeley Air study has since been re-analysed (BAMG 2025), and the re-analysis again found no evidence of a strong Hawthorne effect for cookstove KPTs. The methodology's own cited evidence base has therefore been updated in a direction that does not support the [0.75] default, yet the draft does not engage with the 2025 re-analysis. By contrast, TPDDTEC v5.0 (December 2025) takes a phased approach: HE factor of 0.90 in 2026–27, declining to 0.85 in 2028–29 and 0.75 from 2030. This ramp reflects the recognition that as SUMs deployment increases and KPT protocols mature, the Hawthorne risk diminishes. A developer running the same project under TPDDTEC in 2026–29 would receive approximately 10–15% more credits than under A6.4-MEP013-A02 purely from this provision. The Project Developer Forum's May 2026 consultation submission, also citing BAMG 2025, proposes an immediate flat default of HE_ind = 0.90. Both the TPDDTEC phased approach and the PD Forum flat 0.90 position result in a materially less penalising outcome than the current [0.75] draft default — and both draw on the same empirical evidence the MEP has not addressed.	Adopt a phased Hawthorne schedule aligned with TPDDTEC v5.0, as follows: HE_ind default = 0.90 for crediting periods commencing 2026–2027 HE_ind default = 0.85 for crediting periods commencing 2028–2029 HE_ind default = 0.75 for crediting periods commencing 2030 and beyond This phased approach is grounded in the most current available evidence: the 2025 re-analysis of the Berkeley Air Monitoring Group study (BAMG 2025, building on Bensch & Peters 2013) found no evidence of a strong Hawthorne effect for cookstove KPTs, supporting a less conservative near-term default while the SUMs measurement infrastructure matures. The SUMs measurement route (direct calculation of HE_ind from ratio of reference-period to KPT-period consumption) should be retained and strengthened — it is the correct long-run mechanism — but the default penalty for projects without SUMs should be calibrated against the current evidence base rather than the most conservative possible reading of older data. Proposed amendment to ¶80: "Where fuel consumption is measured by KPT alone without cookstove use monitors, HE_ind shall take the following default values by crediting period start year: [0.90] for 2026–2027; [0.85] for 2028–2029; [0.75] for 2030 and beyond. Where projects deploy SUMs and calculate HE_ind by direct measurement in accordance with ¶81, the measured value shall apply in place of the default."
8	EMISSION REDUCTIONS	¶20–24; Data Parameter Table 10 (fNRB uncertainty application); ¶22 (geographic tier selection rule)	This comment concerns the methodology's own provisions governing how outputs from the published A6.4 fNRB tool (A6.4-MEP012-A04) are applied in the ER calculation — not the tool itself. Two	1. In the methodology text at Data Parameter Table 10, specify the confidence level as 90% (the lower of the two bracketed options): Proposed amendment: "The fNRB value applied in the ER calculation shall be the

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			aspects of the methodology text require amendment. First, the confidence level applied to the tool's uncertainty deduction. The methodology specifies (Data Parameter Table 10) that the fNRB uncertainty deduction shall be applied at [90% or 95%] confidence — with the value in square brackets, indicating the MEP has not yet decided. This is a live parameter in the methodology text, and the choice has a direct and material effect on every project's credit volume. The MEP's own fNRB tool cover note states that the 30% deduction figure is based on expert judgement rather than a formal quantitative uncertainty propagation analysis; it is an interim holding position pending the mandatory three-year tool revision. Applying that expert-judgement deduction at the more conservative 95% CI — rather than 90% CI — compounds conservatism upon conservatism without a commensurate evidence base. The methodology should specify 90% CI as the applicable confidence level. Second, the geographic tier selection rule in ¶22. The methodology mandates a hierarchy (sub-national preferred where data exist, national otherwise) but provides limited guidance on how this applies to programme-of-activities structures where project households are geographically dispersed across multiple sub-national zones, some of which may have published sub-national values and some of which may not. The spread of values within a single country is commercially material: Rwanda's published national default is 33% fNRB, while sub-national values range from 21% to 36% — a 15-percentage-point spread that directly affects credit volume depending on which tier a validator requires. Without explicit methodology-level rules for mixed-geography PoAs, the tier selection becomes a verifier discretion question, creating inconsistency across audits and validation bodies.	default value published in the applicable A6.4 fNRB tool, adjusted downward by 30% at the 90% confidence interval as specified in that tool, in accordance with the uncertainty treatment set out in Data Parameter Table 10." 2. In the methodology text at ¶22, add an explicit rule for geographic tier selection under programme-of-activities structures: Proposed addition after ¶22: "For programme-of-activities with component project activities spanning multiple sub-national zones: (a) where all households in a component activity fall within a single sub-national zone for which a published value exists in the A6.4 fNRB tool, the sub-national value for that zone shall be applied; (b) where households in a component activity span multiple sub-national zones, the national value for the host country shall be applied unless the project proponent can demonstrate, at the 95/10 confidence/precision level, the population-weighted average of the applicable sub-national values; (c) where no sub-national value is published for a given zone, the national value shall be applied. The tier selection and its rationale shall be documented in the project description document and confirmed at validation."

9	APPLICABILITY	¶1–13; Appendix 7 §1–3 (MEP decision record on CLEAR and fuel-switching deferral)	A6.4-MEP013-A02 is currently the sole available A6.4 methodology for non-fuel-switch rural cookstove projects. CLEAR (A6.4-PNM004) has not been adopted as a standalone methodology and there is no current MEP workplan item to finalise it independently. The fuel-switching methodology (covering AMS-I.E. scope) has been deferred with no published timeline. This creates a structural concentration of methodology risk: project developers seeking Article 6.4 credits for rural non-fuel-switch improved cookstove programmes — the predominant category in Sub-Saharan Africa — have no alternative pathway if the parameters in A6.4-MEP013-A02 render projects commercially non-viable. The Supervisory Body should be aware that the commercial impact of the methodology in its current draft form is severe. Our modelling indicates that at current carbon prices, the combination of baseline compression, buffer pool, Hawthorne default and fNRB uncertainty deduction makes it extremely difficult to achieve project-level viability for the exact population of projects the methodology is designed to credit. This undermines the stated policy objective of scaling clean cooking access in low-income contexts. We draw the Supervisory Body's attention to Decision 3/CMA.3, paragraphs 29 and 39, which explicitly require the Supervisory Body to recognise the special circumstances of Least Developed Countries (LDCs) and Small Island Developing States (SIDS) and to encourage their participation in the mechanism (Decision 3/CMA.3, paragraph 5(f) and (g)). The vast majority of projects within scope of this methodology operate in LDC contexts. A methodology whose combined provisions make projects commercially unviable in those contexts is in tension with these CMA mandates. A further commercial risk is the methodology's expiry date of 31 December 2030. A project registered in 2026 with a standard 5-year renewable crediting period would face its first renewal in 2031 — after the methodology has expired. The draft contains no transition commitment: no successor methodology framework, no confirmation that registered projects may continue under existing terms, and no timeline for a replacement. This creates	1. The MEP / Supervisory Body should publish a clear workplan timeline for the fuel-switching methodology (AMS-I.E. scope) and for any decision on the final disposition of CLEAR (A6.4-PNM004), so developers can assess pipeline options. 2. Given that this methodology is currently the only A6.4 pathway for non-fuel-switch rural cookstove projects, the MEP should publish a financial viability assessment alongside the methodology — analogous to the economic impact assessments prepared during the development of major CDM methodologies — to demonstrate that projects generating meaningful mitigation outcomes can achieve financial viability under the methodology as drafted, and that its provisions are consistent with the LDC/SIDS participation obligations in Decision 3/CMA.3. 3. We request that the MEP explicitly confirm the applicability of the methodology to programme-of-activities (PoA) structures with multiple component project activities across different sub-national geographies, clarifying how the 4.5% common-practice screen and Option 2 baseline determination apply at the component level. 4. The MEP / Supervisory Body should publish a transition commitment no later than the finalisation of this methodology, stating: (i) whether A6.4-MEP013-A02 will be extended beyond 31 December 2030; (ii) whether a successor methodology will be developed and harmonised to allow existing projects to migrate without re-validation; and (iii) whether projects registered under v01.0 will retain access to its provisions through to the natural end of their crediting period regardless of the methodology's formal expiry date. Absence of this commitment is a material deterrent to pipeline investment and is inconsistent with the Supervisory Body's stated objective of scaling clean cooking access.

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			pricing risk that prospective buyers will discount and is a direct deterrent to pipeline investment in 2026–27.	