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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	-	-	This is the consolidated feedback from the Project Developers Forum (PD-Forum), which are a consortium of more than 60 project developers actively participating and developing projects in the carbon market. As this is a consolidated feedback from multiple organisations, it should be given more weight in consideration.	-

2	-	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 v.14 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): ~1–6% 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.	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.
3	-	General, Alignment with parallel methodologies	It is difficult to understand the need to develop an entirely new methodology framework when CLEAR (A6.4-PMM004)	Coordinate technical parameter setting (charcoal CO_2 and non-CO_2 EFs, charcoal upstream EFs, WCCF, NCVs, sampling

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			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.	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	-	General, Draft status and dependencies on Tool 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.
5	COVER NOTE	Section 3.3, par 20	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 harmonised 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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6	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 methodologies 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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7	COVER NOTE	par 26, par 44 / Eq 6, Standardized useful energy of 0.001095 TJ/(person·year)	The methodology applies a standardized useful energy of 0.001095 TJ per person per year (3 MJ/p/day) globally, supported in the methodology by a single reference to Gill-Wiehl et al. (2024), which itself cites a wide range of 2–4 MJ delivered per person per day. From our field observations across multiple markets, this single value is not representative of actual cooking energy needs on the ground. Useful cooking energy requirements vary significantly with: • Cultural cooking practices (slow-cooking traditional dishes versus quick-cooking preparations); • Seasonal variations (greater fuel use in cold seasons or for water heating); • Economic context (households with limited fuel access naturally constrain consumption); • Number of meals per day, household composition, and types of dishes prepared. Applying a single global default for useful cooking energy is, in effect, equivalent to applying a default emission reduction per stove based solely on stove efficiency. This is inconsistent with the methodologies ambition of measured, conservative quantification.	I not for allowing the use of KPT we at least need to allow the standardized useful energy value to be regionally differentiated, with default values for SSA, South Asia, Latin America, and other relevant regions, derived from credible published surveys or controlled tests representative of the local cooking context. Alternatively, allow activity participants to demonstrate an activity-specific useful energy value through pre-activity surveys and KPTs, subject to the same statistical reliability requirements applied elsewhere in the methodology (95/10). Document the empirical basis for the global default value of 0.001095 TJ/p/yr in Appendix 7, with reference to the underlying datasets and any regional adjustment factors considered.

8	NON-PERMANENCE PROVISIONS	3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)	The draft methodology A6.4-MEP013-A02 (""Energy Efficiency Measures in Household Cooking"") introduces a non-permanence framework that classifies CO_2 emission 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	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 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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			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 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. Continued in next box...	

9	NON-PERMANENCE PROVISIONS	3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)	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 modelling (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	-

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			modifiable reservoir — precisely the type of 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. Continued in next comment box:	

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10	NON-PERMANENCE PROVISIONS	3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)	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. Keeping in mind that more than 2 billion people remain dependent on woody biomass as a primary energy source, and that market-based mechanisms represent one of the most powerful tools for scaling clean cooking transitions. Imposing buffer pool contributions without scientific justification does not improve the environmental integrity of these projects. It reduces their financial viability and undermines the mechanism’s stated goal of supporting climate action in vulnerable countries.	-

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11	NON-PERMANENCE PROVISIONS	3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)	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." Thus, to ensure continuity between standards and methodologies it is advised to adopt a similar approach to how other carbon crediting standards deal with non-permanence in clean cooking programs.	Adopt the no-control approach and do not require clean cooking programs to contribute to a buffer pool as crediting is based on energy efficiency improvements and reductions in emissions rather than CO2 sequestered into biomass. Thus, permanence is a non issue and should not be considered in these project types.
12	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	-

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13	NON-PERMANENCE PROVISIONS	"3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)"	The ICVCM has come to a similar conclusion as the rest of the comment, where the following was stated from the Board Observations on Cookstoves and Biodigesters: "The assessment process considered numerous viewpoints on this issue and noted 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" . https://icvcm.org/wp-content/uploads/2025/03/Board-Observations_Cookstoves-and-Biodigesters-FINAL.pdf	Considering all the above it is clear that the general opinion and market standpoint is that non-permanence and buffer pools should not be considered in clean cooking programs as the crediting is based on emission reductions and not removals.

14	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.
15	APPLICABILITY	13	The para 13 (d) under Section 4 sets the following applicability criteria: ""The Article 6.4 activity shall be implemented in	We recommend using the option i) as the primary approach for demonstrating the poverty levels, and where previous indices are

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			locations where the population is demonstrated to experience low income or poverty levels based on a recognized poverty index"". We agree with using the option i) of the para 13 (d) as the primary approach for demonstrating the poverty levels, and where previous indices are unavailable, ii) and iii) to be utilized as the alternative approaches.	unavailable, ii) and iii) to be utilized as the alternative approaches.
16	BASELINE SCENARIO	31	The MEP would like to seek feedback from stakeholders on the use of the term “preactivity scenario” to describe observed conditions on the ground prior to implementation of an Article 6.4 activity, and whether it may be better to term this the “pre-activity situation” since it reflects empirical observations rather than hypothetical conditions.	It is not necessary to re-invent this, whether "scenario" or "situation" is used it is standard and understood that this section refers to what is going on on the ground before project implementation.
17	BASELINE SCENARIO	Section 7.2	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 VM0050, 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 methodologies 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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18	BASELINE SCENARIO	7.3.1	Bracketed text on two Options to set the baseline scenario.	Suggest to keep both Option 1 & 2 For Option 1 - allow for locally relevant published literature to be provided at by project developers in the form of a standardized baseline on baseline efficiency of stoves.
19	BASELINE SCENARIO	par 45 - 51	Under Option 2, activity participants are required to identify comparable technologies and develop activity-level efficiency distribution curves. In developing countries, it may be difficult to obtain sufficiently representative and reliable data for comparable technologies and thermal efficiencies.	If a single benchmark approach is to be selected, consider retaining the methodology-level benchmark approach under Option 1. Otherwise, maintaining both options could allow flexibility depending on activity circumstances. In addition, provide additional clarification on the basis used to determine the benchmark values for each fuel type included in the methodology.
20	BASELINE SCENARIO	par 61 - 65	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.
21	BASELINE SCENARIO	par 65	The methodology defines a user household based on a usage threshold (proposed in para 58(c) as once-per-week), and we support this as sufficient to ensure that uncertainties in project emissions quantification are reduced as far as is practical Without a comparable anchor to baseline cooking patterns this is probably the best way to address uncertainty in project usage. 1. Defining a “user” without an empirical baseline reference is operationally fragile. Best practice in our field experience is to compare project cooking patterns (via SUMs and KPT) to pre-project patterns recorded in the same households. Any single threshold (cooking events per period) applied without a control reference will introduce systematic errors when continuously monitored data is used. That said, we agree that a minimum usage indicator is needed to confirm the stove is not broken, stored, or inaccessible to the household.	-

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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)
22	BASELINE SCENARIO	par 62 - 64	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].
23	BASELINE SCENARIO	-	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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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)
24	BASELINE SCENARIO	-	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 for an exemption of downward adjustments, as per the criteria contained in Section 5.1.3 of the RMPs

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25	BASELINE SCENARIO	par 80 - 82	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.