CALL FOR INPUT

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Document reference number and title: (Recommendation from the MEP to SBM020)

Draft mechanism methodology: Energy efficiency measures in household cooking (version 01.0)

Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	ACTIVITY SCENARIO	par 93 - 96	The methodology proposes a 75% default for HE_ind (equivalent to a 25% discount on PE-side fuel savings under the survey-only pathway). We have substantive concerns with the magnitude and the asymmetry of this provision. The 75% factor is not supported by the literature cited in the methodology. In particular, findings from a 2012–13 study by Berkeley Air Monitoring Group, recently re-analysed (BAMG 2025), did not find evidence of a strong Hawthorne effect for cookstove KPTs. The methodology should ground the proposed factor in current empirical evidence rather than older default assumptions.	Adopt a default HE_ind = 90% (10% discount), consistent with the most recent empirical re-analysis of Hawthorne effects in cookstove KPTs (BAMG 2025, building on Bensch & Peters 2013) and with what parallel methodologies have adopted on the same evidence base, until more current empirical evidence supports a different value. We strongly advocate this approach pending an evidence-collection phase during which projects using modern dMRV report actual cooking patterns before and during KPTs. Allow developers to demonstrate HE_ind > 90% with project-specific SUMs data showing that cooking patterns during the KPT period are statistically indistinguishable from non-KPT periods Where SUMs are deployed continuously, allow Eq 31 (HE_ind = MIN(1, PCE_m/PCE_KPT)) at face value without an upper cap below 100%.

2	EMISSION REDUCTIONS	General	The requirements set out in the draft methodology risk creating a compounding effect through multiple overlapping requirements and adjustments included to ensure conservativeness, including the use of global defaults in the ambitious benchmark based baseline (Option 1, paragraph 45, Table 3). When combined with the stringent applicability conditions, we are concerned that the methodology, in its current form, does not provide sufficient incentives for LDCs and SIDS to benefit from clean cooking carbon projects, contrary to the objectives and spirit of the RMPs - which explicitly require the Supervisory Body to recognize the special circumstances of LDCs and SIDS (Decision 3/CMA.3, annex, paragraphs 29 and 39) and to encourage their participation in the mechanism (Decision 3/CMA.3, paragraph 5(f) and (g)). An individual PDForum member has submitted an excel based analysis applying the methodology's benchmark approach to charcoal-based projects. We quote this analysis conclusion that the draft methodology reduces crediting potential from approximately [0.26 tCO_2e/stove/yr] under CDM AMS-II.G v.14 (which already incorporates conservative factors such as a MoFuSS-derived fNRB and a 4:1 wood-to-charcoal conversion factor) to approximately [0.16 tCO_2e/stove/yr] under the draft EEMHC. This represents an additional −37% reduction relative to AMS-II.G v.14, before accounting for further deductions associated with the Reversal Risk Buffer Pool, OMGE, and the Share of Proceeds for the Adaptation Fund. At current market price for these project types in voluntary and compliance carbon markets, projects are unlikely to remain financially viable under the level of reduction in crediting potential implied by the methodology. A fully documented worked example - based on a fictive case calibrated to a real project and its field measurement data (KPT) - comparing AMS-II.G v.12, AMS-II.G v.14, and the draft EEMHC methodology, is available at the link below. Additional analyses and scenarios (e.g. fuelwood-based projects) can be made available to the MEP upon request.	To this effect, we request the MEP to consider: 1. Allowing alternative nationally appropriate benchmarks to be proposed by project developers and/or DNAs, where well-evidenced; 2. Reconsidering the application of the baseline downward adjustment.; and 3. Taking into account our comments related to the treatment of permanence. Should the MEP wish to engage further on the commercial and implementation impacts of the methodology, the Project Developer Forum stands ready to provide additional evidence and case study analysis — including on woodfuel-based projects — through the channel established under paragraph 46 of the Procedure: Direct Communication with Stakeholders, which provides for interaction between the MEP and project developer forums on policy issues relevant to methodological standards and procedures.

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3	EMISSION REDUCTIONS	par 105	The draft methodology introduces an uncertainty analysis requirement at a [95%][90%] confidence level. The methodology already includes several conservative approaches, including Hawthorne effect adjustments, user household caps, and ambitious benchmark approaches.	Consider whether additional uncertainty analysis under paragraph 105 is necessary where conservative approaches are already applied within the methodology.

4	DATA AND PARAMETERS NOT MONITORED	Tables 4, 6, 8, 9	The draft assigns charcoal the following parameters (Data Tables 4, 6, 8, 9): • EF_CO_2 (combustion): 87.9 tCO_2/TJ • EF_nonCO_2 (combustion, AR5 GWPs): 5.845 tCO_2eq/TJ • EF_CO_2,upstream: 72 tCO_2/TJ • EF_nonCO_2,upstream: 4.25 tCO_2eq/TJ These values diverge from those used in parallel methodologies covering the same physical fuel. Without alignment, two projects in the same Kenyan town distributing the same charcoal stove will produce non-comparable credits depending on which methodology they register under. On the upstream side specifically: the methodology applies a single global value of 72 tCO_2/TJ which implicitly assumes a wood-to-charcoal conversion factor (WCCF) that may not reflect SSA earth-mound kiln efficiency. Field studies of artisanal charcoal production in SSA consistently support a 6:1 WCCF, whereas more efficient industrial kilns in South America and parts of Asia operate at 4:1. A single global default fails to capture this regional reality. 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 the 7.1:1 value) and as such the 4:1 factor should be adopted. However, this is not consistent with accurately 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	Regionalise the charcoal upstream EFs based on the WCCF observed in the dominant local production technology. We propose: 6:1 WCCF for SSA and other regions where earth-mound kilns dominate; 4:1 for South America and Asia where pit kilns or industrial kilns are more common. The methodology should provide a default mapping and allow project-specific evidence where available. Publish the full derivation chain from the underlying kiln efficiency, WCCF, NCV of wood and NCV of charcoal to the final EF_CO_2,upstream value. This allows independent reproducibility. Align all charcoal emission factors (EF_CO_2, EF_nonCO_2, EF_CO_2,upstream, EF_nonCO_2,upstream) with the parallel Gold Standard CLEAR / MECD / TPDDTEC methodologies during the consultation phase, to support transparency and confidence in the carbon market.

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			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. Additionally, the rationale for the chosen values is difficult to reconstruct from the meth text. Appendix 7 references the underlying calculations but does not show the full conversion chain from physical kiln efficiency to the upstream EF value.	
5	APPENDIX 1	Section 8, Principles for Responsible Carbon Finance in Clean Cooking	The methodology references compliance with the “Principles for Responsible Carbon Finance in Clean Cooking” as an optional disclosure in the Activity Information Cover Sheet. We are not entirely clear on how this reference is intended to operate: • Is compliance evaluated by the DOE/VVB, or self-declared by the activity participant? • What is the consequence of non-compliance, informational only, or does it affect issuance? • Which version of the Principles applies (the document evolves over time)?	Clarify in Appendix 1 the precise role of the Principles for Responsible Carbon Finance reference. Specify: (i) the version applicable at registration; (ii) whether compliance is self-declared or independently verified; (iii) the consequences (if any) of non-compliance. Consider making compliance with the Principles a mandatory disclosure (rather than optional), to strengthen alignment with broader market integrity initiatives.
6	APPENDIX 3	Section 4, Determination of sample size	Paragraph 14 of Appendix 3 (on Determination of sample size) references a footnote but the corresponding footnote number is not provided in the text we received. We see the footnote referenced as number 3 in this paragraph, which should be made explicit.	Verify and explicitly insert the footnote number in paragraph 14 of Appendix 3, and confirm the cross-reference resolves to the correct supporting document.

7	APPENDIX 7	-	While the draft Article 6.4 fNRB tool (A6.4-MEP012-A04) focuses on improving the estimation of default fNRB values, a more fundamental issue arises for ER accounting in cookstove activities: fNRB is applied as a fixed ex-ante parameter, identical in baseline and project scenarios. By definition (e.g. A6.4-MEP012-A04), fNRB represents the imbalance between biomass harvesting and the landscape's natural regeneration capacity. Any project that reduces woodfuel demand necessarily modifies this balance and therefore the fNRB itself. Treating fNRB as static in both scenarios is conceptually inconsistent with its own definition, and results in systematic under-crediting of mitigation outcomes. Two implications follow: i. Dynamic fNRB in the project scenario. A reduction in biomass demand decreases over-harvesting and therefore lowers fNRB in the project scenario relative to the baseline. This dynamic effect is a genuine additional emission reduction attributable to the activity, not currently captured by the methodology. ii. System boundary effect on non-project households. Because fNRB is calibrated at landscape level (typically a sub-national, national supply pool) covering many more households than the project participants, any project-induced change in fNRB affects the emissions of all households drawing on the same biomass pool. Current methodologies credit only direct reductions in consumption among project households and ignore this broader mitigation contribution. A proposed revision of the ER formulas is set out in the supporting note available here: https://url.avanan.click/v2/r02/___https://drive.google.com/file/d/1v4tlWKd022jmkwIlkvww2-f39Qk-yANt/view?usp=drive_link___.YXAxZTp0YXNjOmE6bzphZTYzMTQ5NjU2ZjkyYzI5YTA3Yzk3YWQyOTUwOTImNzo3OmM2ZDg6YzJmOTQ5YmYwZDY0ODU2OTk5YmM5YmJiZTI4MjhjMDBlOTE3NzNhMWFmY2UxYTUyM2ViZmJkMzMzMzJmZjA4Yjp0OlQ6Rg Modelling tools such as MoFuSS already make this adjustment technically feasible without fundamentally redesigning the methodology. Active research is currently underway with the MoFuSS research team to quantify this genuine positive spill-over	We recommend the MEP consider, for this draft methodology and for future Article 6.4 methodologies, the incorporation of an additional ER term reflecting: i. The dynamic adjustment of fNRB in the project scenario ii. The resulting emission impact on non-project households within the fNRB assessment boundary. Recognising this contribution would (i) restore conceptual consistency between the definition of fNRB and its application in ER equations, and (ii) reduce systematic under-crediting of large-scale clean cooking interventions. In parallel, we recommend that the MEP retain sufficient flexibility for activity participants to apply scenario-based or localised MoFuSS calculations where these can be shown to improve accuracy and environmental integrity, rather than mandating exclusive reliance on the fixed default values of the fNRB tool until its next revision in three years. Default values provide simplicity and predictability; activity-specific dynamic modelling should remain a permitted complement where justified.

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			effect within ER calculations, and the resulting findings will be shared with the MEP upon publication.	

8	COVER NOTE	Equation 6, Standardized Useful Energy of 0.001095 TJ/(person·year)	The methodology applies a standardised useful energy value of 0.001095 TJ/person/year (3 MJ/person/day) globally as the foundational input to all baseline energy calculations under the ambitious benchmark approach. We consider that this single global default value, exclusively in Gill-Wiehl et al. (2024), is insufficiently disaggregated, inadequately supported by the cited evidence base, and inconsistent with consumption data presented by peer-reviewed, regionally differentiated published data. The empirical basis is a single reference citing a wide and undifferentiated range. A single global default value applicable across Sub-Saharan Africa (SSA), Latin America, South Asia, and East Asia alike — which is not scientifically justified. The breadth of the range (2–4 MJ/person/day) signals that meaningful geographical disaggregation is necessary and that a single central value will systematically misrepresent consumption in specific regional contexts. For charcoal-based projects, the 3 MJ/person/day assumption combined with the methodology's Conservative BAU thermal efficiency of 31.9% yields a per capita baseline charcoal consumption of 0.0034 TJ/person*year, which should be equivalent to 0.115 tonnes/person*year (~0.316 kg/person*day and approximately 0.547 kg/meal/household/day for a household of 5). For context, these figures are inconsistent with peer-reviewed, regionally differentiated published data, as are materially below consumption levels documented by project KPTs across multiple SSA and Latin American markets, and inconsistent with reported household charcoal expenditure surveys in these regions. The Bailis and Ghilardi (2024) updated fNRB Values for Woodfuel Interventions report — the reference document cited for and underpinning the A6.4-MEP012-A04 fNRB tool and UNFCCC CDM Tool 33 (Default values for common parameters v.3, 2025) — provides regionally differentiated per capita consumption estimates derived from household surveys, field measurements, and cross-referenced project data. For charcoal, the Bailis and Ghilardi estimates range from 0.16 to 0.25 tonnes/person/year across relevant regions,	We propose two complementary revisions to be adopted in combination, as a standardised energy value set at the lower bound of observed consumption does not represent a conservative assumption in the conventional methodological sense. It does not protect environmental integrity by reducing the risk of over-crediting. Rather, it reduces credited emission reductions by underestimating baseline fuel consumption. The consequence is structural under-crediting of genuine mitigation outcomes, particularly in high-consumption contexts such as charcoal-dependent SSA markets and firewood-dependent Latin America. This is particularly concerning in light of the broader cumulative conservatism already embedded in the methodology, including the Hawthorne effect adjustment, the Ψ usage cap, the 1% annual downward adjustment, and the BAU comparison ceiling. Each of these mechanisms independently reduces credited volumes. Anchoring all baseline calculations on a globally undifferentiated energy assumption at the low end of the observed range compounds these reductions without additional environmental integrity benefit. The proposed revisions are: Revision to Option 1— Regional Differentiation of the Default Useful Energy Value The 3 MJ/person/day global default should be replaced by a table of regionally differentiated default values, with separate figures for at minimum: Sub-Saharan Africa, Latin America and the Caribbean, South Asia, and East Asia. These values should be derived from the Bailis and Ghilardi (2024) regional consumption estimates. Additionally, activity participants should be permitted to propose an activity-specific useful energy value under Option 1, where locally representative published literature is available — for example, national biomass surveys, peer-reviewed household energy studies, or FAO/IEA country-level data. This is consistent with the provision in other A6.4 methodologies that allow regionally or nationally appropriate benchmarks to be demonstrated where well-evidenced. Addition of Option 3: Project-Specific KPT-Measured Baseline A third baseline option should be introduced, under which activity participants may determine the pre-activity baseline fuel consumption directly from project-level Kitchen Performance Tests (KPTs) conducted prior to activity implementation. This approach replaces the standardised energy

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			with fuelwood estimates ranging from 0.40 to 1.10 tonnes/person/year. It is methodologically untenable for MEP013-A02, CDM and MEP012-A04 to share a common fNRB reference base while using divergent consumption assumptions: the fNRB tool is calibrated against regional biomass demand data that implies consumption levels materially above the 3 MJ/person/day floor. Adopting the lower-bound energy assumption while applying fNRB values derived from higher consumption contexts creates a structural inconsistency that systematically suppresses credited emission reductions. Furthermore, the Bailis and Ghilardi estimates are consistent with default values published in UNFCCC CDM-MP88-A19 (Review of Default Baseline assumptions, 2022) and with field KPT data from project developers across multiple markets. These represent the established, science-based reference for the improved cookstove sector and should be afforded at least equal methodological weight to the single Gill-Wiehl et al. (2024) citation currently used to justify the global default.	assumption with directly observed fuel consumption data, which is both more accurate and more transparent. Option 3 should be subject to the following safeguards: • Conformance with a defined KPT protocol consistent with the CCA KPT methodology referenced in Appendix 5 of MEP013-A02; • A minimum statistical reliability standard of 95/10 on total energy consumption per person per year; This option does not undermine environmental integrity — the statistical reliability requirements ensure that over-crediting risk is controlled. However, it eliminates the systematic under-crediting that results from applying a globally undifferentiated energy assumption to projects where better data are available and verifiable.