CALL FOR INPUT

Name of submitter	Kyungrak Kwon
Affiliated organization of submitter	Plan 1.5
Email of submitter	kyungrak@plan15.org
Date of submission	15/05/2026

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	DATA AND PARAMETERS NOT MONITORED	Data/Parameter Table 10 (fNRB)	fNRB is the key component which drives over-crediting issues in cookstove projects. According to our research 'Recipe for Greenwashing' co-authored by Carbon Market Watch and UC Berkeley Carbon Trading Project in 2024, fNRB values higher than the latest modelled values contributed to over-crediting, account for an average 2.4-fold by itself. To prevent this over-crediting issue, we strongly recommend setting conservative fNRB values. For more detailed guidance, we recommend referring to 'Updated fNRB Values for Woodfuel Interventions (Adrian Ghilardi and Rob Bailis, 2024). A comparison between the country-level fNRB values in the fNRB Tool and those reported in the Bailis dataset indicates that the default values for at least 46 countries such as Uganda, Guinea-Bissau were established at higher levels in the Tool, which directly contributes to the risk of over-crediting.	"The methodology requires the use of fNRB values contained in the "Methodological Tool: Fraction of non-renewable biomass" (A6.4-AMT-00X) and provides requirements for how to select the fNRB default at the sub-national, national, or multi-national level." The methodology uses the latest literature-derived fNRB values from Modeling Fuelwood Sustainability Scenarios (MoFuSS), a dynamic landscape model that provides fNRB values for different regions. If the project location isn't listed on the MoFuSS map, Bailis's "Scenario B-Low Yield" values will be used. Where MoFuSS or Bailis values are unavailable, project developers will opt for a conservative 30% fNRB value, which is rarely chosen by project developers.

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)
2	DATA AND PARAMETERS NOT MONITORED	para. 112.	Kitchen Performance Tests (KPTs) play a critical role in accurately quantifying emission reductions from cookstove projects, as they help capture real-world usage patterns, including potential rebound effects. Unlike the AMS-I.E and AMS-II.G methodologies, which do not require KPTs, the proposed methodology introduces KPT monitoring as a mandatory component. This is a meaningful improvement over existing methodologies. That said, requiring KPTs only once every two years is unlikely to be sufficient. Reliable assessment of real-world conditions requires repeated measurements over time, particularly to account for seasonal variations in fuel consumption and stove-use behavior. Poor KPT design can directly lead to over-crediting. We therefore recommend conducting KPTs at least annually, with a monitoring frequency designed to adequately capture seasonal variability and changes in actual household usage patterns	"KPTs shall be undertaken every two years, within the last four months of the monitoring period for which credits are being validated and issued" KPTs shall be undertaken every year, within the last four months of the monitoring period for which credits are being validated and issued. Also, it should be designed to assess seasonable patterns.

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)
3	BASELINE SCENARIO	para. 62	For Usage rate, reliance on surveys could be biased because self-reported stove usage is widely recognized as unreliable due to social desirability and bias. The Lawrence Berkeley National Laboratory found that households substantially overreported cookstove usage when compared against sensor-based measurements, overstating both cooking duration and cooking frequency by roughly a factor of two. The study concluded that survey responses could not reliably predict actual stove usage and that sensor-based monitoring provided a substantially more accurate representation of household behavior. Also, our research "Recipe for Greenwashing" found that cookstove projects relying on survey-based methods to measure usage rates resulted in approximately 1.8 times over-crediting from the usage component alone. In this context we recommend adopting sensor-based measurements rather than surveys. If survey-based approaches are allowed, the methodology should apply a conservative downward adjustment to reported usage rates to account for the tendency of households to overstate actual stove use in surveys.	"For the parameter representing the percent of activity households with cookstove present that qualify as user households, a cap of [90 per cent] or [75 per cent] shall be applied to ~ " For the parameter representing the percent of activity households with cookstove present that qualify as user households, a cap 58 per cent shall be applied to ~, [[add]] Usage rates shall be determined using sensor-based measurements.