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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	COVER NOTE	26, 27	"The "ambitious benchmark" approach allows only a standardized baseline with a default value of 0.001095 TJ per person per year, based on 3 MJ per person per day, equivalent to 0.42 t of wood per person per year. This value is far too conservative and disconnected from reality. It effectively undermines the economics of project development: no new project can be economically viable using this parameter. Projects must be allowed to apply a scientifically measured baseline. To date, no project worldwide has relied on this type of default value. For a project where the actual measured baseline consumption is, for example, 0.9 t/person/year—a value that is not unusual for intensive biomass cooking in rural Sub-Saharan Africa—the methodology limits crediting to less than half of the real emission reductions achieved. Moreover, this approach does not constitute a simplification, as the project developer must still demonstrate whether the project activity delivers at least the minimum level of useful cooking energy defined by the ambitious benchmark baseline of 0.001095 TJ per person per year. The proposed new methodology must not prohibit the use of Kitchen Performance Tests (KPTs) to assess the baseline scenario (especially since CLEAR explicitly allows them), nor should it make the use of default values mandatory. Relying solely on default values in the absence of scientifically robust Kitchen Performance Tests is not a step in the right direction and sets a dangerous precedent that could jeopardize future versions of the CLEAR methodology. Secondly, the proposed default value of 0.42 t of wood per person per year is significantly lower than the default values used in CLEAR and VM0050, which are set at 0.5 t/person/year."	"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. The new methodology should retain the cap at 2 t of wood per person per year(cf CLEAR)""

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2	BASELINE SCENARIO	44, 52, Table 4	"The "ambitious benchmark" approach allows only a standardized baseline with a default value of 0.001095 TJ per person per year, based on 3 MJ per person per day, equivalent to 0.42 t of wood per person per year. This value is far too conservative and disconnected from reality. It effectively undermines the economics of project development: no new project can be economically viable using this parameter. Projects must be allowed to apply a scientifically measured baseline. To date, no project worldwide has relied on this type of default value. For a project where the actual measured baseline consumption is, for example, 0.9 t/person/year—a value that is not unusual for intensive biomass cooking in rural Sub-Saharan Africa—the methodology limits crediting to less than half of the real emission reductions achieved. Moreover, this approach does not constitute a simplification, as the project developer must still demonstrate whether the project activity delivers at least the minimum level of useful cooking energy defined by the ambitious benchmark baseline of 0.001095 TJ per person per year. The proposed new methodology must not prohibit the use of Kitchen Performance Tests (KPTs) to assess the baseline scenario (especially since CLEAR explicitly allows them), nor should it make the use of default values mandatory. Relying solely on default values in the absence of scientifically robust Kitchen Performance Tests is not a step in the right direction and sets a dangerous precedent that could jeopardize future versions of the CLEAR methodology. Secondly, the proposed default value of 0.42 t of wood per person per year is significantly lower than the default values used in CLEAR and VM0050, which are set at 0.5 t/person/year."	"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. The new methodology should retain the cap at 2 t of wood per person per year(cf CLEAR)"

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3	ACTIVITY SCENARIO	91,92	"This approach does not constitute a simplification either, as the project developer must still demonstrate whether the project activity's energy consumption delivers at least the minimum amount of useful energy for cooking defined under the ambitious benchmark baseline of 0.001095 TJ per person per year. "	"The proposed new methodology must allow "Kitchen Performance Tests" to assess the baseline scenario (although CLEAR permits it), and not make the use of a default value as mandatory"
4	COVER NOTE	44	"A simple science-based model shows that the application of a sufficiently conservative fNRB effectively covers the risk of non-permanence. For instance, let us assume that the calculated climate impact of a project over one crediting period is 100 tCO ₂ (combining emission reductions and removals). Suppose that a non-permanence risk assessment tool requires a buffer of 20%, i.e. 20 tCO ₂ . Now consider three illustrative fNRB values: 20%, 50%, and 70%. Under these assumptions, the emission reductions granted as carbon credits would be 20, 50, and 70 tCO ₂ , respectively, while the non-credited emission reductions would amount to 80, 50, and 30 tCO ₂ . These non-credited tonnes of CO ₂ remain stored in forests in the form of wood biomass. In all cases, they exceed the 20 tCO ₂ buffer requirement, demonstrating that the risk of non-permanence is more than adequately covered through the application of the fNRB alone. Even with an fNRB of 80%, the implicit buffer coverage is 20%, and the highest fNRB value currently referenced is 65%, as per the draft A6.4-MEP012-A04 Tool: Fraction of Non-Renewable Biomass (v2). An fNRB of 65% therefore provides an effective coverage of 35%, well above typical buffer requirements."	"It should be stated that no additional non-permanence provisions are required, as scientific evidence demonstrates that the application of the fNRB sufficiently covers the risk of non-permanence. An option may be introduced to cap the fNRB at 65%. 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). "

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5	NON-PERMANENCE PROVISIONS	10.2	"A simple science-based model shows that the application of a sufficiently conservative fNRB effectively covers the risk of non-permanence. For instance, let us assume that the calculated climate impact of a project over one crediting period is 100 tCO ₂ (combining emission reductions and removals). Suppose that a non-permanence risk assessment tool requires a buffer of 20%, i.e. 20 tCO ₂ . Now consider three illustrative fNRB values: 20%, 50%, and 70%. Under these assumptions, the emission reductions granted as carbon credits would be 20, 50, and 70 tCO ₂ , respectively, while the non-credited emission reductions would amount to 80, 50, and 30 tCO ₂ . These non-credited tonnes of CO ₂ remain stored in forests in the form of wood biomass. In all cases, they exceed the 20 tCO ₂ buffer requirement, demonstrating that the risk of non-permanence is more than adequately covered through the application of the fNRB alone. Even with an fNRB of 80%, the implicit buffer coverage is 20%, and the highest fNRB value currently referenced is 65%, as per the draft A6.4-MEP012-A04 Tool: Fraction of Non-Renewable Biomass (v2). An fNRB of 65% therefore provides an effective coverage of 35%, well above typical buffer requirements."	"It should be stated that no additional non-permanence provisions are required, as scientific evidence demonstrates that the application of the fNRB sufficiently covers the risk of non-permanence. An option may be introduced to cap the fNRB at 65%. 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). "
6	COVER NOTE	13, Table 1	As the objective is simplification, there is no need to introduce an additional restriction linked to demonstrating that income levels are below an applicable poverty threshold.	Target Population: should be "restricted to rural locations" only.
7	APPLICABILITY	13 (e) 13(j)	13 (e) As the objective is simplification, there is no need to introduce an additional restriction linked to demonstrating that income levels are below an applicable poverty threshold. 13(j) No need for a common-practice screen confirming that no more than 4.5% of the target population already possesses a cooking technology with equivalent or higher efficiency	This part should be deleted

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8	BASELINE SCENARIO	37.	delete a common-practice screen confirming that no more than 4.5% of the target population already possesses a cooking technology with equivalent or higher efficiency	This part should be deleted
9	COVER NOTE	30	The Downward Adjustment Factor (DAF) should not be applied in subsequent years covered by the exemption, as allowed under paragraphs 65 and 66 of Chapter 7.2 of the Standard: Setting the Baseline in Mechanism Methodologies (v01.0). The methodology is already very conservative, as only emission reductions associated with the fNRB are eligible for crediting.	Withdrawal of §30 is requested
10	BASELINE SCENARIO	7.5.1	"The DAF should not be applied in subsequent years covered by the exemption, as allowed under paragraphs 65 and 66 of Chapter 7.2 of the Standard: Setting the Baseline in Mechanism Methodologies (v01.0). The methodology is already very conservative, as only emission reductions associated with the fNRB are eligible for crediting."	"DAF should be at zero"
11	BASELINE SCENARIO	73, 74, 75, 76, 78, 79, 80, 81, 82	The proposed methodology introduces a unique dual-baseline construction not found in any of the comparator frameworks. 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 the upper-bound uncertainty interval). The final crediting baseline must always sit below this Conservative BAU figure. This creates a scenario where even the already-conservative Option 1 benchmark can be further reduced — a double-conservative ratchet with no equivalent in VCS, Gold Standard or CLEAR frameworks. "Conservative BAU baseline" overlaps other requirements. This is also not compatible with the request to and the Option 3 based on base line measurements with KTP.	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.