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Name of submitter	Victor Costenoble
Affiliated organization of submitter	Victor Costenoble
Email of submitter	victor@vico2s.com
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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	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. 2 The fNRB Framework Is the Appropriate Risk Management Tool (see the rest in next comment 2)	

2	COVER NOTE	3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)	Follow up of previous comment : 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	Ibid. Comment 1

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			causal relationship to a managed or 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. 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." 4 Risk of Suppressing High-Impact Projects Without Integrity Benefit (see the rest in next comment 3)	

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3	COVER NOTE	3.11. Non-permanence provisions (Art.44) 3.12. Emission reductions (Art.45) 10.2. Buffer pool contributions (Entire section)	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. 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.	Ibid. Comment 1

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4	COVER NOTE	3.4. Identification of the baseline scenario 23. Para. 23	The 4.5% penetration threshold used to test the performance-based approach should explicitly exclude improved/clean cookstoves whose deployment was enabled by carbon finance (including under CDM, voluntary standards, or Article 6.4 itself). By definition, such adoption does not reflect a counterfactual baseline scenario — it is itself the result of carbon-market intervention, and counting it in the baseline conflates project-driven outcomes with autonomous market dynamics	in paragraph 23, clarify that the penetration assessment shall exclude cookstoves attributable to carbon-crediting activities and shall be based on autonomous (non-incentivised) adoption only.

5	COVER NOTE	Para 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.
6	BASELINE SCENARIO	Section 7.2, Selection of the baseline approaches from paragraph 36 of the RMPs	We strongly believe that the methodology should incorporate an additional baseline option based on existing actual or historical	Add Option 3, Project-specific measured baseline. Allow activity participants to determine the baseline using project-level KPT

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			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 VMR0006, enabling more comprehensive use of digital monitoring activities (including digital KPTs) and supporting transparency and confidence in the carbon market.	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 methodology's conservativeness intent while restoring the value of empirically measured pre-activity baseline data, and aligns with the analogous provisions in parallel cookstove methodologies.
7	BASELINE SCENARIO	7.3.1 - Baseline Setting	Bracketed text on two Options to set the baseline scenario.	On top of proposed change in Comment 7: under Option 1, we further recommend that activity participants be allowed to substitute the methodology default values with values derived from locally relevant, peer-reviewed published literature on baseline cookstove efficiency, where such literature is available and meets defined quality criteria. This could be operationalised through a standardised baseline mechanism under which project developers may submit a proposed locally calibrated benchmark for approval, supported by appropriate documentation. Such a provision would maintain the simplicity of Option 1 while improving its representativeness in geographies where the methodology-level defaults are demonstrably non-representative.

8	APPENDIX 7	Para. 34 Data / parameter table 10.	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, under document "fNRB in carbon methodologies_vShort.pdf": https://drive.google.com/file/d/1v4tlWKd022jmkwIlkvww2-f39Qk-yANt/view?usp=drive_link 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 effect within ER calculations, and the resulting findings will be shared with the MEP upon publication.	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.
9		Section 15 - Data parametesr 8 and 9 - wood	The methodology embeds wood-to-charcoal (W2C) conversion ratios as low as 4:1 within the charcoal upstream emission factors	Allow the use of a default wood-to-charcoal conversion factor of 6:1 as an explicit option in Data Parameter Tables 8 & 9, recognised as a

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	DATA AND PARAMETERS NOT MONITORED	to charcoal conversion factor	(Data Parameter Tables 8 & 9). Available empirical evidence indicates that such low ratios are not representative of real-world artisanal charcoal production systems and create a material risk of systematic under-crediting. Recent peer-reviewed evidence. Urban et al. (2026, Energy for Sustainable Development; https://www.sciencedirect.com/science/article/abs/pii/S096195342501325X?dgcid=author) assessed charcoal yields across a representative sample of producers in Malawi and Ghana. Key findings: Kiln-stage conversion factors: 7.3 kg wood / kg charcoal (Malawi), 6.9 kg/kg (Ghana), 7.1 kg/kg overall. System-boundary-expanded factors (including wood losses during harvesting, transport and distribution): 9.5 kg/kg (Malawi), 10.6 kg/kg (Ghana), 10.0 kg/kg overall. These results demonstrate that values as low as 4:1 are not realistic under field conditions, even before accounting for upstream losses. Convergence with other standards. The same conservative direction is reflected in the CLEAN Cooking Alliance CLEAR methodology, which adopts a default W2C conversion factor of 6:1 for LMIC contexts based on a meta-analysis of the existing literature. CLEAR explicitly notes that 6:1 better reflects observed field conversion efficiencies and applies this assumption consistently across its emission factors and fNRB-related calculations (CLEAR Revised Explanation of Decisions, June 2025, https://cleancooking.org/wp-content/uploads/2025/06/CLEAR-revised-EOD-June-2025.pdf). Taken together, these sources support the conclusion that a 6:1 W2C ratio is a conservative, evidence-based default, whereas values around 4:1 are not supported by peer-reviewed empirical evidence and may undermine the environmental integrity of the methodology by systematically understating baseline emissions.	conservative, evidence-based default aligned with recent peer-reviewed literature (Urban et al., 2026) and with established clean cooking methodologies (CLEAR). Activity participants opting for a value different from 6:1 should provide a documented justification based on equivalent or stronger empirical evidence applicable to the project boundary.

10	EMISSION REDUCTIONS	Section 11: Emission reductions	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, I am 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 recognise 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)). To illustrate this concern, I have conducted an Excel-based analysis applying the methodology's benchmark approach to a charcoal-based project. The analysis concludes 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 prices for these project types in both the 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. https://docs.google.com/spreadsheets/d/1Pk	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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11	COVER NOTE	General comment	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 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): ~1–4% 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.	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.