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<i>Name of submitter</i>	WWF International
<i>Affiliated organization of submitter</i>	WWF International
<i>Email of submitter</i>	rscotney@wwfint.org
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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)
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1	INTRODUCTION	General Comment	WWF has been actively engaged in the clean cooking sector for several decades. For many of our offices, particularly across the Global South, clean cooking remains a strategic priority. WWF recognizes that current unclean cooking processes result in severe negative impacts, including accelerated climate change, significant deforestation, loss of biodiversity, and adverse health outcomes. The IPCC's Sixth Assessment Report states that net zero energy systems will share common characteristics, including the "widespread electrification of end uses, including [...] cooking". This is in alignment with WWF's global energy framework, our long-term vision is to "electrify all we can." However, in the interim, it is necessary to reduce energy demand through robust energy efficiency measures. Carbon finance is a major source of income, but projects using flawed methodologies (inflated counterfactual baselines and permanence estimates) overestimate climate benefits, posing a risk to the Paris Agreement. This poses a major risk for addressing climate change, especially if the credits are used to offset the emissions of a country, company or organisation. Projects that do not use projected baselines, are based on jurisdictional approaches and have strong permanence safeguards, are generally able to mitigate such risks better. Several scientific studies have highlighted significant over-crediting in clean cooking projects to date. (e.g. 1. Gill-Wiehl et al, Pervasive over-crediting from cookstove offset methodologies. Nat Sustain 7, 1 (2024), 2. Probst, B.S., Toetzke, M., Kontoleon, A. et al. Systematic assessment of the achieved emission reductions of carbon crediting projects. Nat Commun 15, 9562 (2024), 3. Shankar et al, Lessons from household energy case studies to inform design principles for clean energy transitions, Energy Policy, Volume 141, 2020).	WWF strongly supports the transition to a more conservative Article 6.4 mechanism. The methodology must mandate the use of conservative methodologies and independent data to ensure every credit issued represents a genuine and verifiable reduction in greenhouse gas emissions.
2	BASELINE SCENARIO	Section 7.4.1 Para. 62-64	WWF strongly supports a shift toward real-time monitoring to enhance the accuracy of MRV. Shanka et al (2020), and others, demonstrate that rarely does adoption of new stoves lead to full 100% usage. The current draft should be tightened to discourage reliance on surveys conducted	Prioritize Stove Use Monitors or similar metered data to ensure objective, verifiable evidence of adoption and usage. This should be done by reducing the default claimed usage rate to a conservative figure, in line with the latest independent scientific studies and research

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			by project developers, which can introduce bias. The draft gives project developers the right to claim usage rates up as 90% without any stove use monitors (SUMs), which discourages uses of SUMs.	
3	DATA AND PARAMETERS NOT MONITORED	Data Parameter table 10	The Fraction of Non-Renewable Biomass (fNRB) must be based on detailed, independent research that is regularly updated (not only at the start of a crediting period, which can be up to 10 years). Ghilardi and Ballis (2024) describes in detail the rationale for adopting more scientifically backed FNRB figures. https://cdm.unfccc.int/Sunset_CMS_Controller/public_inputs/sunsetcms/storage/contents/stored-file-20240624161613578/Report_on_Updated_fNRB_Values_20%20June%202024.pdf	Use conservative, evidence-based fNRB values based on research updated throughout the crediting period to prevent the systematic overestimation of avoided forest degradation. For example, using the more robust MoFuSS model as a standard is important to ensure conservative assumptions.
4	BASELINE SCENARIO	Section 7.3.1 (Para 43-54)	Establishing the baseline for clean cooking must be rooted in detailed independent research that applies conservative assumptions. This upholds the integrity of the mechanism against the "stacking" of non-conservative assumptions regarding usage and baseline scenarios.	WWF supports the use of the "Ambitious Benchmark" approach to ensure that the crediting baseline is set significantly below business-as-usual conditions
5	COVER NOTE	N/A	The fundamental principle of these methodologies is to use independent data to ensure that every credit issued represents a genuine emissions reduction must be that project participants cannot choose the most lenient or "generous" options. Instead, the Article 6.4 mechanism must mandate the use of conservative methodologies and verifiable reduction in greenhouse gas emissions.	The Article 6.4 mechanism must mandate the use of conservative methodologies and independent data to ensure that every credit issued represents a genuine and verifiable reduction in greenhouse gas emissions.