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

Concept note: Revision of methodological standards and tools for application to programmes of activities (version 01.0) and its appendices

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	-	General	Downward adjustment is not a necessary condition for Paris Agreement alignment. A project can be fully aligned with a host country's NDC, long-term strategy and its plan for raising ambition over time, without being subject to an automatic baseline reduction. For clean cooking, an annual downward adjustment (DAF) would introduce a structural bias, especially for projects that already use conservative and measured baselines. These baselines are derived from direct field data, meaning that they already capture real-world efficiency and evolve naturally as technologies and markets improve. Imposing a DAF would double discount emission reductions, risking making projects financially unviable and effectively excluding low-income countries from participation. This outcome would be inconsistent with the Paris Agreement's equity principles and its objective to enhance, not suppress, mitigation ambition in developing contexts.	Exempt clean cooking from the mandatory application of DAFs.

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2	Appendix 4. Draft Standard: Addressing suppressed demand in mechanism methodologies" (version 2.0)	20 - Identification of the level of service for meeting basic human needs	Energy needs for heating vary significantly by geography (e.g., staying warm in Mongolia requires much more energy than in Cameroon). As such, 4C believes that a more sensible approach would be to set a consistent threshold for cooking and apply a separate, region-specific threshold for heating. Combining them creates unnecessary complexity.	Separate cooking and heating energy thresholds rather than combining them into a single energy threshold. Set a consistent global threshold for cooking and apply a separate, region-specific threshold for heating.

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3	Appendix 4. Draft Standard: Addressing suppressed demand in mechanism methodologies" (version 2.0)	20 - Identification of the level of service for meeting basic human needs	2.1 GJ/person/year is not an appropriate threshold for cooking and heating combined.	We suggest the MEP/SB changes this: "For total useful energy delivered from fuel used for cooking and heating up to 2.1 Gigajoules (equivalent to 583 kWh) per person per year" to "For total useful energy delivered from fuel used for cooking up to 2.1 Gigajoules (equivalent to 583 kWh) per person per year" "For total useful energy delivered from fuel used for cooking up to 1.17 Gigajoules (equivalent to 583 kWh) per person per year" would also be appropriate. The value of 1.17 GJ-delivered/person*year of delivered cooking energy provides a conservative and evidence-based estimate for suppressed demand in energy-poor households. It is calculated from 0.5 tonnes of raw wood per person per year, assuming a net calorific value of 15.6 GJ/tonne and a 15% thermal efficiency, typical for traditional biomass stoves. 1.17 GJ-delivered/(person*year) is slightly lower than the average delivered energy of 1.27 GJ/person*year observed across a set of independent Kitchen Performance Tests (KPTs) conducted in rural South Asia and Sub-Saharan Africa, where households depend primarily on wood and other unprocessed biomass fuels for cooking (see table at this link: https://docs.google.com/document/d/1aWrXCk9xF8Bv9CCkrjhJwke7PiJ1IBuH2n1i5T_NABY/edit?usp=sharing). These KPTs represent the best available empirical data on real-world cooking energy consumption in energy-poor contexts. The table below summarizes the raw and delivered energy use, as well as wood-equivalent consumption derived from these KPTs. The small downward adjustment in using the 0.5-tonne benchmark helps ensure that the default suppressed demand value remains conservative, while still backed by high-quality data. Importantly, this value should only be applied to the cooking energy required, and in energy poverty contexts where stoves are also used for heating, the heating energy required should be estimated separately.

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4	Appendix 4. Draft Standard: Addressing suppressed demand in mechanism methodologies" (version 2.0)	29	Paragraph 29 is confusing as written.	Consider simplifying and adding examples for sectors (including cookstoves) where suppressed demand is common.
5	Appendix 6. Draft Methodological Tool: Common practice analysis (version 2.0)	69	A threshold of 30% reflects a reasonable bound for when a self-sustaining market for clean cooking technologies is likely to exist in LMICs. While a rule of thumb often identifies a 20% penetration rate as a tipping point for a self-sustaining market, the threshold should be set higher for clean cooking due to weak distribution and knowledge networks connecting urban and rural areas and the relatively small middle-class consumer segment with disposable income in LMICs.	Set common practice thresholds for clean cooking at 30% or higher.
6	Appendix 6. Draft Methodological Tool: Common practice analysis (version 2.0)	General	For energy access-focused activities such as clean cooking, conventional additionality tests are not an appropriate measure of climate ambition of Paris Agreement alignment. These interventions address structural market and affordability barriers, not marginal investment decisions. In most LMIC countries, clean cooking projects are commercially unviable and would not proceed without carbon finance. Every ton of CO2e reduced through such projects represents an additional reduction beyond what would occur under existing policies or market trends.	The common practice tool should not penalize sectors, such as clean cooking where market failure, not saturation, defines adoption.

7	Appendix 7. Draft Methodological Tool: Investment analysis (version 2.0)	General	The approaches of the investment analysis (i.e., simple cost analysis, benchmark analysis, or investment comparison analysis) are not feasible or appropriate for the majority of cookstove project activities. Cookstove activities are typically implemented at the household level, one of the specific cases where, per paragraph 54 of the Article 6.4 Standard: Setting the baseline in mechanism methodologies (Version 02.0), a barrier analysis may be applied as an alternative to investment analysis. The Clean Cooking and Climate Consortium (4C) considers an investment analysis to be inappropriate to represent additionality for the following reasons: Simple cost analysis, per the Article 6.4 Standard: Demonstration of additionality in mechanism methodologies, requires demonstrating that the implementation of the carbon project is associated with costs and does not generate any cost savings or revenues other than from carbon credits. This is not suitable for cookstove projects, as many generate modest revenues, such as partial cost recovery from cookstove or fuel sales. While these revenues are generally insufficient to make the project financially viable, they would disqualify the project under a simple cost analysis, even though the project still depends on carbon finance to exist or scale. Benchmark analysis involves comparing a project's financial performance against a financial benchmark, such as the internal rate of return (IRR). However, cookstove projects often lack clear, centralized cash flows and are not implemented with the goal of achieving a financial return. Many are implemented by non-profit entities or social enterprises, which focus on public health and environmental outcomes rather than profit maximization. Investment comparison analysis requires comparing the project's financial attractiveness against alternative investment options. Similar to the benchmark analysis, this is not relevant in the clean cooking sector, where most projects are not structured as commercial investments and do not compete with alternative profit-generating options. Many projects are public-good interventions designed to address energy access, health,	A barrier analysis is better suited to the clean cooking sector and more accurately reflects the constraints that prevent these projects from being implemented in the absence of carbon finance.

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			and climate challenges, not maximize financial return.	

8	Appendix 8. Draft Methodological Tool: Analysis of lock-in risk (version 2.0).	General	The risk of lock-in emissions exists primarily for projects with high upfront capital investment; immobile, long-lived infrastructure; and high switching costs. Project operators are contractually or economically obligated to use the infrastructure or technology for its lifetime in order to ensure that upfront costs are reimbursed, and returns are generated as expected. Clean cooking projects do not share these characteristics. At the household level, the capital involved is relatively low, and appliances have short replacement cycles. Moreover, households have a much more dynamic approach to deciding when and how to replace their cooking appliances. While liquidity and credit obligations or constraints may be one factor, many other dimensions influence this decision, including family size, home location, fuel and technology availability, education, etc. Therefore, households routinely re-evaluate their cooking technology choices, and carbon projects can influence these decisions through behavior change communications, subsidies, incentives, etc. At the energy system level, even transitional cooking fuels do not entail the type of immobile, high-capital infrastructure typically associated with fossil fuel lock-in. Distribution networks are modular and low-capital, and markets for transitional cooking fuels are small relative to national energy systems. Moreover, electrification and grid expansion timelines are typically driven by infrastructure investment cycles, not by stove adoption patterns, making it highly unlikely that the adoption of transitional cooking solutions crowds out electric cooking. In general, therefore, there is very limited risk of lock-in emissions in the cookstove context, while the greater empirical risk is backsliding to high-emitting polluting fuels due to affordability concerns, supply instability, or household circumstances.	Clean cooking appliances typically have an operational lifespan below the ten-year threshold and would therefore be outside the scope of lock-in risks defined in the current methodological tool. However, we recommend that cookstove carbon projects should be explicitly exempt from lock-in emissions risk assessments. Lock-in risk assessments are intended to address activities that may create durable, long-term dependence on high-GHG emitting infrastructure or technologies. Cookstove carbon projects generally do not have these characteristics, including where they involve transitional cooking fuels. At the household and institutional level, cooking technologies are comparatively low-capital, modular, replaceable, and do not typically create the type of immobile, long-lived infrastructure or high switching costs associated with systemic fossil-fuel lock-in. This exemption would provide regulatory clarity, avoid unnecessary technical debates, and burden for project developers. If UNFCCC does not adopt a full exemption, we recommend that, at minimum, it establishes a dedicated simplified pathway for clean cooking projects, including projects using transitional cooking fuels, where the activity does not involve large-scale, dedicated, long-lived fossil-fuel infrastructure or long-term contractual or economic dependence on fossil-fuel use.
9	Appendix 8. Draft Methodological Tool: Analysis of lock-in risk (version 2.0).	Definitions, 5 (f)	Interpretation of technical lifetime: Please clarify whether an applicable mechanism methodology may define “intended service” using minimum performance criteria. The definition of technical lifetime refers not only to the period during which equipment remains functional, but also to the period	Clarify whether “intended service” may be defined by the mechanism methodology using minimum performance criteria

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			during which it can "deliver its intended service if maintained according to the manufacturer's specifications or standard industrial practices...". Accordingly, a mechanism methodology could potentially define the intended service using specific performance criteria. Under such interpretation, a cookstove that still physically exists after 10 years may not necessarily be considered capable of delivering the same intended service after that period.	

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10	Appendix 8. Draft Methodological Tool: Analysis of lock-in risk (version 2.0).	12 and 13	Please clarify the extent to which a mechanism methodology may modify the application of this methodological tool. In particular, please clarify whether a mechanism methodology may establish that cookstove projects do not create lock-in risk and therefore do not need to undergo the subsequent GHG-intensity and resource-use-efficiency assessments. Alternatively, is the flexibility under paragraphs 12 and 13 limited to specifying alternative values or methods for Flock−in? Paragraph 12 says: "Mechanism methodologies may provide further specifications and requirements for how activity participants shall apply this methodological tool in the context of the type of mitigation activities covered by the mechanism methodology, and in the context of programmes of activities, and, inter alia, for different values for Flock-in if the approach in equation 2 would exclude technologies, measures or practices that would not cause lockin risk." Paragraph 13 further states that "Where the mechanism methodology referring to this tool specifies approaches that differ from those described in this methodological tool, the requirements contained in the mechanism methodology shall take precedence." It is therefore unclear whether these provisions allow a mechanism methodology to exempt certain activity types from subsequent assessments under the tool or only to modify the parameters and methods used in those assessments.	Clarify whether paragraphs 12 and 13 allow a mechanism methodology to determine that certain types of mitigation activities, including clean cooking activities, do not create lock-in risk and are therefore not required to undergo the subsequent GHG-intensity and resource-use-efficiency assessments, or whether the flexibility is limited to specifying alternative values or methods, and how.