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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 2.0).

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	Cover note	Cover note Para 83, A6.4-STAN-METH-007 paras 6(a), 10, 11(b)	The methodology as drafted still requires decentralised cookstove activities to undertake a 100-year reversal-risk assessment and to contribute A6.4ERs to the buffer pool. The methodology's own paras 50-52 confirm that all three A6.4-STAN-METH-007 para 13 exemption conditions are met: activity participants do not control the relevant reservoir, the reservoir is geographically separate from the activity, and observed changes cannot be attributed to the activity. As an implementing partner developing and supporting clean cooking activities under the Mechanism, we note that a demand-side efficiency activity avoids a combustion flux rather than sequestering carbon in a reversible stock, and that fNRB already discounts credited reductions for the non-renewable share of biomass. A buffer pool contribution applied on top of this therefore double-discounts the same underlying risk. Where the methodology's own analysis satisfies the exemption conditions set out in A6.4-STAN-METH-007, we consider that the appropriate regulatory conclusion is exemption, not a reduced monitoring burden alone. We submit that this conclusion is further reinforced on both causal and technical grounds. On causation: paragraph 6(a) of A6.4-STAN-METH-007 restricts the non-permanence provisions to activities "increasing carbon stocks or reducing the loss of carbon stocks, relative to the baseline, in any of the greenhouse gas reservoirs of the biosphere." A causal link between avoided household fuelwood consumption and an actual increase in, or reduced loss of, forest carbon stock cannot be assumed. First, suppressed demand means millions of households already face constrained fuelwood access, leading to adaptive behaviours such as fewer cooked meals (FAO: https://www.fao.org/4/t7750e/t7750e05.htm) ; fuelwood freed up by a clean cooking activity is liable to be absorbed by other households or communities previously without adequate access, rather than remaining unharvested. Second, forest degradation is substantially driven by commercial logging and industrial timber use - a market-driven activity distinct from household fuelwood collection; wood not	We request that fNRB-based demand-side cookstove activities be fully exempted from the buffer-pool contribution, not only from ex-post monitoring obligations. We ask the SB to recognise fNRB, updated at each crediting-period renewal, as the appropriate and complete instrument for addressing forest-carbon risk in this activity category. Where any residual buffer contribution is retained, we request that it be capped so that it is not additive to fNRB on the same tonnes of emission reductions. We further request that the Supervisory Body confirm that the threshold condition in paragraph 6(a) of A6.4-STAN-METH-007 is not met by A6.4-MEP014-A04 as currently drafted, given the absence of any carbon-stock calculation in the baseline or activity scenario, and that footnote 4 not be treated as a binding requirement in place of the operative text. We ask the MEP, as methodology proponent, to either identify the national and sub-national reversal-related policies required under Section 4.2, paragraph 10, or confirm that none apply, and to clarify that issuance of A6.4ERs under Section 5, paragraph 11(b) is not conditioned on actual stock-change measurement for this activity category.
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			gathered for cooking is not thereby protected from harvesting for these other purposes. We also note that published, peer-reviewed evidence attributes the large majority of deforestation to agricultural expansion rather than fuelwood harvesting - approximately 90% per FAO (https://www.fao.org/newsroom/detail/cop26-agricultural-expansion-drives-almost-90-percent-of-global-deforestation/en), consistent with Pendrill et al. (Science, DOI: 10.1126/science.abm9267) - such that even a genuine reduction in fuelwood harvested has a negligible effect on forest carbon stock, supporting treatment of these activities as emission avoidance rather than emission reduction carrying reversal risk.	

2	Cover note	paras 51-52, A6.4-STAN-METH-007 para 18(a); A6.4-MEP014-A07 Appendix 2 para 7	As an implementing partner, we welcome the rationale already reflected in paragraphs 51 and 52 of the cover note and paragraphs 53(c) and 57(b) of Section 10, namely that "activity participants neither control the relevant carbon reservoirs nor have any incentive to increase reversal risks, with their interests aligned toward reducing biomass consumption and associated emissions," that "activity participants have a direct economic interest only in actions that reduce emissions from the reservoir (rather than increase them)," and that reservoirs are "geographically distinct from the locations of the cookstove deployment by the mitigation activity" such that "observed changes cannot be attributed to the activity." We refer to this as rationale 1, and note it has correctly been used to dismiss activity participants from monitoring potential reversals during the project lifetime. When rationale 1 is read together with a second, related consideration - that losses of carbon stock in these reservoirs, being unrelated to the activity, would by definition be reflected in a higher fraction of non-renewable biomass (fNRB) for the activity region at the point the fNRB value is next updated - it follows that no discount factor for reversal risk (fBuffer, per para 115, equation 36) should be applied to clean cooking methodologies anchored on the fNRB approach. Since the applicable fNRB is fixed at the start of the crediting period, before any such carbon-stock losses occur, it is by construction lower than a subsequently updated fNRB that incorporates those losses. A Buffer deduction applied against reversals outside the activity's control therefore risks double-discounting a risk already captured, dynamically, within the fNRB mechanism; and where such reversals do occur, their effect is to make the activity's emission reductions more conservative, not less. We note that both the Kyoto and Paris regimes have consistently favoured an evidence-based approach, as reflected in A6.4-STAN-AC-003, whereas the current treatment of clean cooking assumes, without demonstration, that avoided fuelwood consumption translates into reduced loss of, or increase in, carbon stock. We further note that Decision 2/CMA.3 (Annex, para 3(a))	We request that clean cooking projects relying on fNRB-based methodologies be exempted not only from the monitoring criteria associated with reversals, but also from the application of a reversal-risk discount factor (fBuffer), on the basis of the combined reasoning set out above. We ask that Appendix 7, Table 4 of A6.4-MEP014-A04 be revised so that any claimed consistency with equation 1 of A6.4-STAN-METH-007 reflects actual stock-change calculations rather than energy-equivalent baseline figures, and that the Reversal Risk Assessment Tool (A6.4-MEP014-A07) revise the absolute-attribution approach in Section 1.2.1, para 7, Appendix 2, to require a causal nexus before attributing reservoir losses to an activity. At a minimum, and pending resolution of the broader applicability question above, we ask the Supervisory Body to disapply the fBuffer and associated non-permanence provisions to clean cooking and other fNRB-anchored activities hosted in Least Developed Countries and Small Island Developing States, in accordance with Decisions 2/CMA.3 and 3/CMA.3.
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			and Decision 3/CMA.3 (RMP para 29, and paras 5(f)-(g)) direct that the special circumstances of least developed countries (LDCs) and small island developing states (SIDS) be recognised in the Mechanism's rules, modalities and procedures. As the great majority of clean cooking activities are hosted in LDCs, we ask the Supervisory Body, at a minimum, to give effect to these provisions by disapplying the non-permanence and fBuffer provisions to clean cooking and other fNRB-related activities hosted in LDCs and SIDS, pending any broader determination on applicability.	
3	7. Baseline scenario	Section 7.3.1 - Baseline	As an implementing partner, we note that the fraction of non-renewable biomass (fNRB) is a key parameter, strongly influenced by factors specific to a given geographic region, with data availability - and hence estimate accuracy - varying considerably by region. We recognise that the Modelling Fuelwood Savings Scenarios (MoFuSS) tool, which underlies Tool 33's default fNRB values, represents a marked improvement over Tool 30, including through input from the UNFCCC's methodology panel. However, Tool 33's estimates rely on the data and assumptions available at the time the model was run, which do not always align with conditions on the ground in every context. Further, Tool 33 provides only national fNRB values; although MoFuSS itself estimates fNRB at a finer (1 km) resolution, aggregation to national level can obscure significant sub-national variation. Across the host-country contexts in which we operate, as elsewhere, reliance on a single national fNRB value for geographically diverse regions can materially over- or under-state the emission reductions of sub-national activities.	We request that the methodology allow more precise fNRB estimates in addition to the current national default under Tool 33, through: (1) revised country-level fNRB estimates developed by the MoFuSS team, where relevant national and sub-national data are available, submitted with supporting documentation to a DOE or to the MEP/SB directly for review and approval, ideally developed by an independent research team to avoid bias; and (2) the reinstatement of sub-national fNRB values as previously defined in Tool 33 v2.0, which we understand are already available and would support more accurate emission-reduction estimates in countries with significant intra-national variation, including where such sub-national estimates are subsequently updated by the MoFuSS team.