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Date of submission	13/07/2026

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)

1	10. Non-permanence provisions	Section 10 (non-permanence), paras 53(c), 55(b), 57(b); Cover Note 3.1.4, paras 51-52	As already recognized by the draft methodology as per Paragraphs 51 and 52 of the cover note as well as paragraph 53c and 57b of Section 10, “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”. “Activity participants have a direct economic interest only in actions that reduce emissions from the reservoir (rather than increase them)”. Furthermore, “reservoirs are geographically distinct from the locations of the cookstove deployment by the mitigation activity and observed changes cannot be attributed to the activity”. We welcome this rationale, which has been correctly used to dismiss activity participants from monitoring potential reversals during the project lifetime. For the purposes of this comment, we refer to this rationale as “rationale 1”. However, when rationale 1 is analyzed in conjunction rationale 2, as explained below, it becomes clear that no discount factors (fBuffers, etc.) potentially attributable to reversal risks should be applied to clean cooking methodologies that are anchored on the fNRB approach. Rationale 2 is herein defined as the conceptual fact that losses of carbon stocks in the referred reservoirs are the result from higher pressure on forest carbon stocks (unrelated to the activity as per rationale 1) and, by definition, would lead to an increase in the fraction of non-renewable biomass factor (fNRB) at the activity region, either at national or subnational levels as applicable. The fNRB factor applicable to the activity is defined at the beginning of the crediting period, as per the recently updated fNRB tool. Since it is set before the potential carbon stock loss events have occured (carbon stock “reversals” as referred by the methodology), the activity fNRB is logically lower than what a new fNRB would be once it eventually incorporates such carbon losses. Therefore, it does not make sense to apply a discount factor (fBuffer - para 115 equation 36) for the potential “reversals” in carbon stocks outside of the control of the activity. If they eventually occur it will mean that the project ERs will become more conservative, since they were not	Exempt clean cooking projects relying on fNRB based methodologies not only from the monitoring criteria associated with reversals, but also from discounting reversal risks as (fBuffer), based on the combined nature of rationales 1 and 2 explained in the justification/comment associated with this proposed solution.

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			considered in the fNRB default adopted by the activity. In conclusion the fBuffer factor should only be applicable to other types of clean cooking methodologies that do not rely on the fNRB rationale. If the fBuffer factor is applicable to a fNRB based methodology, it will result in a double discount, since the dynamics of carbon stocks is captured under the fNRB approach, either for natural or human-induced factors. Any additional carbon losses (reversals of carbon stocks outside of the control of the activity) would mean that the activity ERs will become more conservative, as explained above.	
2	Appendix 7. Demonstration of requirement…	Appendix 7 - para 26 (wood-to-charcoal conversion factor)	By recognizing the most recent scientific references on wood to charcoal conversion factors, especially Urban et al 2026 and 4C 2025a, the methodology has made substantive progress. However, considering that the most recent evidence point to the weighted average of 7:1 and that the previous IPCC value was 6:1, we suggest to adopt a 6:1 factor instead of the 5:1 factor currently proposed by the methodology for three main reasons: (i) it represents transparent and objective criteria (below the most recent value and consistent with an IPCC factor) , (ii) 6:1 is still quite conservative, as it is lower the most recent data (7:1) and (iii) it would not over-penalize a major factor for the calculation of ERs, as the 5:1 is almost 20% higher than the higher end of the most recent evidence (7:1).	Adopt a 6:1 wood to charcoal conversion factor instead of 5:1 based on the objective criteria mentioned in the justification/comment.

3	7. Baseline scenario	Section 7.3.1 - Baseline	The fraction of non-renewable biomass (fNRB) is a key parameter and is impacted by multiple factors that are quite specific to a given geographic region. Data availability on these factors also varies greatly from region to region. Thus, the accuracy of estimates of fNRB also varies greatly by region. The Modeling Fuelwood Savings Scenarios (MoFuSS) tool has been peer-reviewed and refined significantly, including with input from UNFCCC's methodology panel, to more accurately assess the impact of woodfuel harvestly. UNFCCC relies on fNRB estimates generated by the Modeling Fuelwood Savings Scenarios (MoFuSS) tool for default fNRB values for cookstove methodologies. These default values underlie Tool 33 and represent a marked improvement over Tool 30. However, like all models, it has limitations. In particular, the estimates produced for Tool 33 rely on limited available data at the time the model was run. Researchers were required to make some assumptions about key parameters. In some contexts, these assumptions do not align with the actual situation on the ground and lead to inaccurate fNRB estimates. Further, Tool 33 only includes a provision for national fNRB values. While the MoFuSS tool estimates fNRB at a finer resolution (1 km), when these are aggregated to the national level, the estimates can become quite coarse. In countries with diverse ecosystems, this can lead to particularly stark. As an example, Ethiopia includes tropical, temperate and arid regions. MoFuSS values at a district level range from 0% to 77%. The national fNRB value, however, is 33%. Relying on a national fNRB value to estimate the impact of a subnational project in a country with a diverse geography can lead to significant over or underestimates of emissions reductions. In cases where there is reason to believe the model estimates do not reflect reality on the ground and there is local data available on key input parameters, we suggest that more accurate fNRB estimates can be developed leveraging the MoFuSS model. As the model itself is well validated, the remaining question would be the validity of revised input parameters. To ensure the integrity of this approach, the data	Allow the use of more precise estimates of fNRB under this methodology, in addition to the current option of using national fNRB values as defined by Tool 33, based on the following options: 1. Allow revised country-level fNRB estimates, developed by MoFuSS team: In cases where relevant national and subnational data are available, it may be possible to produce more accurate estimates of fNRB for specific countries. Where the MoFuSS team is able to leverage this data and the existing MoFuSS tool to develop more accurate fNRB estimates, we recommend these be allowed under the methodology. To ensure that these revised estimates are valid, we further recommend that revised fNRB estimates and documentation outlining changes in input parameters and supporting data and evidence are provided to a DOE or to the MEP/SB directly for review and approval alongside the revised estimates. The use of independent research teams, such as the MoFUSS team, could also be a requirement to avoid any bias. 2. Allow subnational fNRB values, as defined by Tool 33, v2.0: As noted above, MoFuSS produces much finer fNRB estimates than national values. Version 2.0 of Tool 33 included estimates of subnational values of fNRB. However, these values were not included in the latest version. We recommend that these subnational estimates of fNRB, determined by MoFuSS developers for carbon projects, are allowed within the methodology. This will support more accurate emissions reductions estimates where there is significant variation within a country These can be leveraged immediately as these estimates are already published. They already represent more accurate values than the currently mentioned national values. Where revised estimates of fNRB are developed by the MoFuSS team, we further recommend that revised subnational estimates are allowed within the methodology as well.

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			supporting changes to the default input parameters would need to be reviewed for quality and relevance. Finally, it is worth stressing that this does not represent any change in terms of methodological calculations. Rather, it allows for the use of more locally applicable and transparent data as inputs to increase accuracy and, hence, integrity.	
4	7. Baseline scenario	7.3.1 – Baseline	Considering the highly conservative nature of the ambitious benchmark approach, based on the top 20th percentile and other features, such as the use of poverty levels as a parameter, it would be important to provide more flexibility around the determination of baseline parameters for the Least Developed Countries (LDCs), as already practiced in standard baseline, additionality and monitoring provisions in light of their special circumstances.	Develop differentiated baseline thresholds for LDCs.