



CALL FOR INPUT

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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)
1	4. Applicability	11(c), 13(a-h)	IETA is concerned about the cumulative impact of these eligibility restrictions. While each individual restriction is a normative decision with advantages and drawbacks that may be debated, their cumulative impact may result in the exclusion of a significant number of existing and potential Article 6.4 activities. Activities that are genuinely additional and contribute to the goals of the Paris Agreement and its crediting mechanism will not be eligible, depriving host Parties and communities of much needed carbon finance. Considering the special circumstances of LDC and SIDS recognised in para. 29 of the RMP, we believe these Parties should be exempted from some of these requirements.	The SBM should exempt LDC and SIDS from some of these conditions following an assessment of the scientific basis of each condition. A mandate may be given to the MEP or the Secretariat.

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2	4. Applicability	13(j)	IETA believes the use of a 4.5% penetration rate is fundamentally flawed as it introduces an arbitrary hard eligibility cut-off, which is not a suitable tool for eligibility criteria and additionally demonstration. A small existing stock of equally efficient cookstoves above the 4.5% threshold does not demonstrate that the Article 6.4 activity is not additional, particularly where those technologies were introduced through donor intervention or earlier carbon finance and have not achieved autonomous scale. The use of penetration rate as a hard cap is better suited in an optional or rebuttable common-practice test rather than as an applicability condition.	Remove para. 13(j)
3	7. Baseline scenario	45	As above	Remove the following sentence from para. 45: "As set out in paragraph 13(j) in section 4, this mechanism methodology is not applicable if this proportion is greater than 4.5 per cent."
4	4. Applicability	13(k)	We support the transition to SUMs, which are increasing available thanks to technological diffusion. However, in a context of highly insufficient mitigation finance, some existing and planned mitigation activities may struggle to meet this new requirement in less than 18 months. A postponement of the SUMs requirement to 2031 would also promote consistency over NDC periods and clearer international carbon accounting.	Retain para. 13(k) with an amended date, delete footnote 20: "From 01 January 2031 onwards, emission reductions shall be calculated using stove usage monitored as per section 7.4.1 (using SUMs), noting that a robust sample of stoves equipped with SUMs can be used for deriving this parameter. For any monitoring after that date, emission reductions can only be claimed for stoves for which the usage rate was determined using SUMs."
5	7. Baseline scenario	67-72	As above.	Retain Option 2, but apply for 1 January 2030. Retain the reference to a 95/100 reliability level.

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6	7. Baseline scenario	51, 57(b), 58, 59 (Table 3)	The revised fuelwood backstop (0.0077 TJ or 0.49 tonnes per person per year) is an improvement over v.10, but IETA believes it remains a fundamentally flawed approach as it sets an absolute constraint derived from standardised benchmarks rather than measured consumption. It may therefore substantially understate cooking energy services in specific contexts, particularly in LDCs and Sub-Saharan Africa. IETA supports an approach that preserves integrity while allowing measured local realities to be recognised. As a result, a conservative default value should not be used as an absolute cap when actual data are available. Such an approach is used by Gold Standard in its GS RECH methodology v.5.	Add the following text where appropriate: "Activity participants may propose a more representative regional or activity-specific factor where supported by peer-reviewed research or independently verified field evidence."
7	7. Baseline scenario	73	IETA supports an exemption from downward adjustment in the first year. As previously argued by IETA and other stakeholders, the application of a downward adjustment factor has both merits and unintended consequences, and it is not suitable to a blanket application to all methodologies and activities. The baseline setting standard introduced a mandatory adjustment, but also allowed for exemptions. The application of an exemption is fully justified in this case given the numerous applicability restrictions and conservative assumptions in the methodology.	Retain para. 73
8	7. Baseline scenario	74-79	For the same reasons outlined above, IETA is in favour of an exemption from downward adjustment in subsequent years.	Retain Option 1.

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9	10. Non-permanence provisions	112-115	IETA believes that the application of non-permanence provisions to clean cooking activities is conceptually flawed. The removals standard defines reversals as a negative net change in greenhouse gas storage (para. 30e) in a reservoir or stock. As such, it does not directly apply to fuel wood. In essence, as no forest or woodland carbon stock from is credited by this methodology, the durability and risk of reversals of such stocks should not be considered. Moreover, the reversal risk assessment tool currently under development appears to be inadequate as no human-induced factors are included. In this context, buffer pool contributions would simply result in an additional arbitrary burden on Article 6.4 activity participants and a threat to the viability of high-integrity Article 6.4 activities. The issue is particularly acute in contexts where data are scarcely available and data collection is constrained. Article 6.4 activities in LDCs, especially those with vast territories and large rural populations (such as, for instance, Tanzania or Bangladesh), are likely to be disproportionately impacted. Thus, we urge the SBM to remove these provisions. If they are retained, the significant burden to Article 6.4 activities in LDC and SIDS should be considered and an exemption should be granted to activities in these Parties given their special circumstances recognised in para. 29 of the RMPs.	Remove Section 10. If retained, consideration should be given to an exemption for LDCs and SIDS.
10	15. Data and parameter not monitored	Table 8, Table 9	IETA supports the revision of the wood-to-charcoal conversion factor from 4:1 to 5:1. This is a material improvement over v.1.0 as it reduces an arbitrary source of conservativeness in this methodology. The methodology should also retain a pathway for activity-specific or region-specific evidence where materially more accurate data are available.	Add the following text where appropriate: "Activity participants may propose a more representative regional or activity-specific factor where supported by peer-reviewed research or independently verified field evidence."