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<i>Date of submission</i>	10/07/2026

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	Cover note	Non-permanence — paras 51–53, 83	The buffer-pool exemption was rejected (para 83), but non-permanence provisions should not apply to this activity category at all. Fuelwood not consumed by a participating household does not translate into a demonstrated increase in forest carbon stock: under suppressed-demand conditions the fuelwood may simply be accessed by other wood-dependent households, and published FAO and peer-reviewed data (Pendrill et al., 2022) attribute approximately 90% of global deforestation to agricultural expansion rather than fuelwood collection, so the causal chain from reduced household consumption to an actual landscape-level stock change is not established. Para 51 itself already finds that participants do not control the reservoir, the reservoir is geographically distinct, and reversals cannot be attributed to the activity. The same reasoning applies equally to other fNRB-reliant activities such as safe water systems, which rely on identical energy/fNRB-based accounting with no carbon-stock quantification in either scenario. Mandatory cancellation of A6.4ERs into the buffer therefore sits uneasily with the methodology's own findings and remains the single largest ER deduction for both activity types.	Confirm that non-permanence and buffer-pool provisions do not apply to clean cooking and other fNRB-reliant activities, including safe water systems, on the basis that (i) no carbon-stock-based quantification exists in these methodologies, and (ii) the causal link between reduced household biomass consumption and an actual landscape-level stock change is not established, given suppressed demand and the dominance of agricultural expansion as the driver of deforestation. If the Supervisory Body declines a full exemption, retain as fallback: publish the buffer percentage or risk bracket in the methodology now rather than deferring wholly to the draft tool; provide a reduced (or zero) buffer where sub-national fNRB and the no-control conditions in para 51 are demonstrated; and state explicitly in the methodology body - not only as the informational equation reiterated in para 53 - the sequencing of buffer, SOP and OMGE so that overlapping tonnes are not deducted more than once.
2	Cover note	fNRB — paras 47, 58, 85	fNRB is fixed and not monitored (para 58) yet is the largest single driver of baseline emissions. The MEP ruled value and conservativeness comments “out of scope” and rejected the marginal/dynamic approach (para 85), locking activities to static AMT-009 values for the whole crediting period. The SB has itself mandated further MoFuSS analysis, so the values are expected to move.	Commit in the methodology that any future AMT-009 revision raising fNRB is automatically available to already-registered activities without re-validation. Once the SB's further MoFuSS analysis concludes, permit the marginal/dynamic fNRB approach as an elective option. At minimum, allow fNRB to be updated at crediting-period renewal rather than frozen at first registration.

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3	Cover note	Dependent tools — para 93(a),(b)	SBM adoption of the methodology is contingent on two tools that have not yet completed their own calls for input: Sampling and Surveys, and Reversal Risk Assessment. Until both are approved the methodology cannot be used, and early movers face uncertainty on sampling rules and on the buffer percentage that drives net ERs.	Add a transitional provision allowing validation under stated interim parameters - e.g. the existing CDM “Standard for sampling and surveys” and a stated default buffer bracket - with a one-crediting-period grandfather once each tool is approved, so activities are not stranded during the tool-approval gap.
4	4. Applicability	Mandatory SUMs — paras 32, 44, 13(k)	From 1 January 2028 ERs can be claimed only for stoves whose usage is determined by SUMs: stoves without SUMs claim zero (para 13(k), footnote 20). Applied as a blanket census requirement this imposes heavy hardware, installation and data cost on small rural and artisanal-stove PoAs and may be infeasible at scale.	Confirm that a robust statistical sample of SUMs (not a census) satisfies both the usage and Hawthorne requirements. Introduce a size/materiality threshold below which survey-plus-cap monitoring remains permissible beyond 2028. Confirm SUMs capital and operating cost is an eligible activity cost and is not offset against creditable reductions
5	Cover note	Usage cap set to 58% — paras 31, 46	The new 58% floor for survey-only monitoring (down from 75% in v1.0) applies during the 2026–2027 bridging window before SUMs become mandatory, compounding conservativeness precisely when SUMs are not yet required. It is a flat figure not linked to survey quality.	For the bridging window, replace the flat 58% with a tiered cap linked to demonstrable survey quality (e.g. confidence $\geq 90\%$, precision $\pm 10\%$, stratification by fuel type, third-party verification), reserving the lowest cap for low-confidence data only.
6	4. Applicability	Poverty eligibility — paras 13(d), 13(e)	Eligibility requires an average Multidimensional Poverty Index (MPI) of at least 0.2 (13(d)(ii)) or income at/below the national poverty line, subject to a ceiling at the World Bank lower-middle-income line (~US\$4.2/day PPP 2021, 13(e)). A single global MPI cut-off of 0.2 excludes populations that are biomass-dependent and under-served but sit just below 0.2, and the income ceiling excludes many households that still cook on solid biomass. This narrows the eligible population and the project pipeline without a matching integrity gain, since eligibility for a cooking-efficiency activity turns on biomass dependence, not on a precise poverty score.	Broaden the poverty-eligibility criteria so that more biomass-dependent populations qualify: lower the MPI cut-off in 13(d)(ii) (e.g. towards 0.1) or express it as a band rather than a hard 0.2 floor, and/or raise the income ceiling in 13(e) above the lower-middle-income line where solid-biomass cooking is demonstrated. Retain the tiered structure of 13(d) - national/sub-national indices first, MPI and income as alternatives - but make demonstrated biomass dependence under 13(a) the primary eligibility gate, with poverty shown more flexibly.

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7	4. Applicability	Rural-only restriction — para 11(c), footnote 14	Para 11(c) read with footnote 14 confines activities to areas classified rural wherever a national or sub-national classification exists, excluding peri-urban and informal-urban households. Urbanisation redistributes rather than removes energy poverty (Ravallion, Chen & Sangraula 2007); informal-urban households remain solid-biomass dependent (Batchelor et al. 2021; Ssekimpi et al. 2022 report 89% charcoal use with rural-equivalent indoor air pollution). These households satisfy 13(a) in substance; their exclusion is an artefact of administrative classification.	Revise 11(c) to include peri-urban and urban households that meet the 13(a) biomass-dependence and 13(d) poverty conditions and demonstrate a lack of access to, or means to adopt, cleaner alternatives, subject to project-level safeguards. This broadens reach while preserving integrity.
8	5. Activity Boundary	Para 20	The clean cooking methodology (A6.4-MEP014-A04) identifies a greenhouse gas reservoir but does not condition the issuance of A6.4ERs on any actual stock change within that reservoir. The baseline equations (including Equations 2 and 3) and the corresponding activity-scenario equation (Equation 25) are based on energy-equivalent calculations rather than stock changes. These equations measure energy content in fuelwood or its derivatives (charcoal), not the actual carbon stock in the reservoir.	Reconsider the consistency determination made in Appendix 7 (Section 10.3, Table 4) of A6.4-MEP014-A04 between Equation 9 of the methodology and Equation 1 of A6.4-STAN-METH-007, in light of the reservoir mismatch and energy-versus-stock inconsistencies identified above.

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9	Cover note	fNRB is the complete instrument — Sec 3.9.4 / 3.11	fNRB already discounts credited reductions for the risk that biomass is renewable, calibrated at sub-national/national/multi-national scale (MoFuSS); if regeneration improves, fNRB and credits fall. Layering a buffer contribution on top double-discounts the same forest-carbon risk, for both clean cooking and other fNRB-reliant activities such as safe water systems. Gold Standard's new Paris-aligned cooking methodologies classify such activities under a "No Control" exemption and do not require buffer contributions; the ICVCM Board Observations on Cookstoves and Biodigesters note that methodologies "may not directly measure and address reversal risks because emission reductions are derived from energy displaced or saved, rather than from maintaining biomass stocks."	Recognise fNRB as the sole and sufficient instrument for forest-carbon integrity in these activities, including safe water systems, and remove the buffer requirement, aligning with Gold Standard, Verra and the ICVCM position; state this explicitly in the cover note and reopen only if new attribution evidence emerges.