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Name of submitter	Laurent Perrinjaquet
Affiliated organization of submitter	BURN Manufacturing
Email of submitter	laurent.perrinjaquet@burnmfg.com
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Document reference number and title: (Recommendation from the MEP to SBM020)
Information note: Sampling requirements for designated operational entities (version 01.0)

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	"Cover note, para 5-8 Appendix 1, para 1(a)"	We understand the intention behind the additional criteria the auditor (DOE) is asked to apply when a single sampling plan covers more than one project, namely to prevent sampling being concentrated in the larger or better-performing sites. We support checking for real bias. We are concerned, however, that these criteria could discourage the legitimate pooling of activities that are genuinely alike (same stove, same fuel, same type of household), which we have asked to be allowed in the Sampling tool.	"Keep the auditor criteria consistent with the Sampling tool, so that pooling one sample across similar activities remains a workable option. Direct the auditor to focus on detecting genuine differences in performance between sites, using the same clear, objective criteria we have proposed for the Sampling tool (same stove type, same fuel, same baseline, comparable region), rather than treating pooled sampling as a problem in itself."
2	2. Validation and verification of sampling plans	Section 2, para 6	Para 6 allows the auditor to apply its own sampling approach using confidence and precision requirements different from those in the Sampling tool or the methodology. This creates uncertainty: a project that has correctly met the required reliability could still be assessed against a stricter, undisclosed standard chosen by the auditor.	Clarify that when the auditor applies its own sampling for verification, it should not impose a stricter reliability standard than the methodology requires of the project, unless there is a documented and justified reason. The auditor's role is, to check compliance with the applicable requirements.

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3	4. Appendix 2. Recommended practices…	"Appendix 2, section 1.2, para 4 Table 1 (para 16)"	We welcome the recognition that, for parameters monitored by sensors or pay-as-you-go systems, the added value of a site visit "may be limited" (Appendix 2, para 4), and that the auditor may verify by reviewing stove-use monitor data (Talbe 1). This reflects how modern cookstove projects are monitored.	Confirm clearly that, where validated stove-use monitor or metered data exists, the auditor may verify the parameter by reviewing that data, without a mandatory on-site visit. Treat validated digital measurement as equal to physical measurement for verification purposes.
4	4. Appendix 2. Recommended practices…	Appendix 2, section 1.3, para 4-8	The note still describes physical on-site visits as the preferred method and other methods as less preferred. As with the Sampling tool, we do not think this ranking is justified for validated digital measurement, which can be more accurate and more objective than an occasional visit.	Ask the auditor to choose the verification method on the basis of demonstrated accuracy rather than a fixed preference for physical visits, and to accept validated digital measurement on equal terms.
5	2. Validation and verification of sampling plans	"Table 1 (para 16), fuel consumption row (Kitchen Performance Tests)"	The note recognises Kitchen Performance Tests (KPTs) and allows the auditor to verify them either by re-performing or witnessing tests, or by reviewing the KPT records, equipment, calibration and procedures. We support this, and in particular the option to review records rather than reperform every test.	Confirm that a review of complete KPT records (supported by stove-use monitor data where available) is a sufficient basis for verification, so that re-performing KPTs is reserved for cases where the records are inadequate. This keeps verification proportionate.
6	2. Validation and verification of sampling plans	"Paras 13-14 (Treatment of discrepancies)"	We welcome the provision allowing the auditor to reclassify apparent discrepancies where they are caused by factors outside the project's control, such as technology performance changing over time, weather events, or other external conditions (paras 13-14). This is fair and reflects real field conditions.	Retain this provision, and confirm it is applied consistently, so that genuine external factors are not counted as project errors.