



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	Cover note	General comment	The call for input on the 2 methodologies recommended for adoption at SBM 022 is only open from 6 to 13 July. This window is far too short for stakeholders to be able to give proper responses and risks penalising stakeholders with fewer resources and capacity to respond. It falls well short of the 21-day period required under paragraph 91 of the "Procedure: Development, revision and clarification of methodologies and methodological tools". It also runs counter to paragraph 21 of decision 20/CMA.7, in which the CMA mandates the Supervisory Body to facilitate broad stakeholder engagement, in particular for the groups that face barriers to participation. We request that the window be extended until at least the 27th of July 2026.	-

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2	Cover note	General comment	Carbon Market Watch welcomes the introduction of some good elements in the latest version of this draft methodology, such as accounting for non-permanence risks and the introduction of the mandatory use of SUMs, which should be retained and, if anything, only strengthened. At the same time, we note there are still some outstanding issues to resolve, as outlined in our comments below.	-
3	Cover note	-	We stress the importance of adopting a conservative approach in calculations and assumptions for this methodology. This is for two main reasons. The first is that, as stated in paragraph 54 of the cover note, key parameters have large uncertainty ranges. The second is that cookstove methodologies have historically suffered from severe over-crediting. For example, Gill-Wiehl et al. found their project sample to be over-credited by a factor of 9.2 (Source: Gill-Wiehl, A., Kammen, D.M. & Haya, B.K. Pervasive over-crediting from cookstove offset methodologies. Nat Sustain 7, 191–202. 2024. https://doi.org/10.1038/s41893-023-01259-6), As stated in paragraph 56 of the cover note, the P10 values are generally about 30 to 50 per cent of the mean values, and paragraph 55 states that the P10 of the results of the Monte Carlo simulation was found to be in the range of, or higher than, the quantification resulting from the methods and parameter values included in this mechanism methodology. This reduction from the mean indicates that the current approach to this methodology may only reduce overcrediting rather than ensuring that the methodology is very unlikely to be overestimated. Given the historical high overcrediting associated with multiple cookstove methodologies, from both the CDM and VCM, this is a critical issue to address.	We ask the SBM to request that the MEP make public the information about Monte Carlo analysis.

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4	10. Non-permanence provisions	-	We welcome and strongly support the introduction of the provision to account for non-permanence risk. This is in line with paragraph 6(a) of the “Standard: Addressing non-permanence and reversals in mechanism methodologies” which clearly states that the Standard applies 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. Footnote 4 of the Standard clarifies that this includes activities reducing the consumption of non-renewable biomass, such as cookstoves. We also support that the units will be cancelled immediately upon transfer to the reversal risk buffer pool account. We also want to stress that we remain sceptical of buffer pools as effective safeguards against non-permanence due to underestimated risk assessments which can lead to undercapitalisation of the pool. We will address our concerns regarding this in more detail in our response to the call for input on the “Draft methodological tool: Reversal risk assessment (v.01.0)”.	No change requested to the methodology. We strongly support the inclusion of non-permanence risk and provisions in the methodology and ask for them to be retained. We ask that the final reversal risk assessment tool adopt a conservative, science-based approach.

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5	7. Baseline scenario	-	We welcome the inclusion of mandatory physical monitoring via SUMs. However, we want to highlight that the current version of the recommended methodology delays making SUMs mandatory until 1st of January 2028. Allowing survey-only monitoring to continue for several more years introduces a significant risk to the environmental integrity of the credits obtained with this methodology as survey-based reporting remains fundamentally flawed due to social desirability bias, where recipients of free or subsidised stoves are prone to overreporting usage when asked once-off if they have used the stove at all by the organisation that provided the stove. We welcome that the adoption or “usage” cap was lowered compared to version 1 of the draft methodology when customer support actions are provided. However, the 90% cap when customer support actions are provided is not conservative: it does not reflect expected realworld usage rates, and it does not create genuine incentives for SUMs deployment. We request that the methodology adopt a more conservative value of 50%, as justified in our previous input (item 4 of our submission): https://unfcccstwebprd01.blob.core.window.s.net/pacm/Call_for_input/MEP013-A02-CFI-Energy-efficiency-Carbon_Market_Watch-3.pdf	We request SUMs to become mandatory by 1st of January 2027 at the latest. We request that when survey-only methods are permitted, they must be subject to a conservative cap of 50%.
6	14. Monitoring requirements	126	See our previous input on the rule that Kitchen Performance Tests (KPTs) only need to be conducted every two years. Item 5 of our submission: https://unfcccstwebprd01.blob.core.window.s.net/pacm/Call_for_input/MEP013-A02-CFI-Energy-efficiency-Carbon_Market_Watch-3.pdf	We recommend mandating annual KPTs, ideally conducted quarterly as proposed by Gill-Wiehl and Haya to account for seasonal fuel patterns.

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7	7. Baseline scenario	Section 7.5.1.	The MEP is requesting the Supervisory Body to consider an exemption to the downward adjustment. We think this should be denied, given that the methodology must fulfil the requirement for all mechanism methodologies to increase ambition over time. The MEP notes the rationale for this is that the methodology is implemented exclusively in low-income and impoverished households and, in addition to climate benefits, also results in health and gender-related improvements for the participating households. We appreciate the fact that this methodology brings positive co-benefits, but this cannot come at the cost of Article 6.4 activities contributing to increased climate ambition over time. This tension between climate ambition and co-benefits raises doubts about whether carbon crediting is in fact the most appropriate method of funding cleaner cookstoves.	Request the Supervisory Body to not allow an exception to applying a downward adjustment. Select Option 2.