

The Chair of the Supervisory Body of the Article 6.4 mechanism

Mr. Mkhuthazi Steleki

Article 6.4 Mechanism, UNFCCC

cc: Ms. Adriana Gutierrez and Mr. Simon Fellermeier

Co-Chairs, Methodological Expert Panel

UNFCCC Secretariat

Bonn, Germany

28th September 2026

Dear Chair of the Supervisory Body of the Article 6.4 mechanism,

BURN submissions on issues included in the SBM 023 annotated agenda and related annexes

BURN is Africa's largest clean cooking carbon project, with over 7 million stoves distributed across 14 countries. We care deeply about the integrity of clean cooking methodologies, and support the work of the Methodological Expert Panel and the Supervisory Body to raise standards.

For this reason, we request that the Supervisory Body **does not approve** the clean cooking methodologies and tools as proposed at the forthcoming SBM023 in October 2026.¹ While we thank the Methodological Expert Panel for their fast work this summer, we are concerned that the process has been rushed, and there is need for further technical due diligence and stakeholder engagement. There has not been adequate sector engagement since the drafts were released in July 2026.

The MEP Information Note on reversal risk goes well beyond a technical adjustment. It describes the effect of reducing non-renewable biomass as "a land-use change impact", and appears to propose a reclassification of clean cooking crediting under LULUCF. A change of this magnitude deserves more than a week of sector consultation, especially given serious technical and scientific points remain outstanding. We prefer to delay approval until they are resolved.

If the Supervisory Body wishes to consider a reclassification of clean cooking, we kindly request that the scope of work includes:

- Assessment of the status of clean cooking in Host Country Greenhouse Gas Inventories and Nationally Determined Contributions – the project type currently sits between LULUCF baselines but energy sector targets
- Consideration of crediting for forest regrowth, to balance out conservatism adjustments
- Further funding for research on fNRB, and regular updates to default values (to account for changes in biomass stock)
- Better mechanisms for recognizing the value of ancient forests, over fast-growing vegetation (or non-native trees like eucalyptus) which absorb more carbon
- A strategic view of whether 2 billion people cooking with biomass fuel should really be considered "renewable"

Clean cooking remains an urgent unmet opportunity for energy transition at the household level. Methodologies under the Paris Agreement Crediting Mechanism should support the UN's Sustainable Development Goals. To achieve SDG7 – universal access to clean cooking by 2030 – it is essential that emission reductions are accurately quantified, while ensuring that climate finance can still flow to this important sector.

¹ This submission responds to A6.4-MEP016-A04 (the "Information Note"), A6.4-MEP016-A07 (the "Reversals Tool"), and their relationship with A6.4-STAN-METH-007 (the "Reversals Standard"), as well as the two proposed clean-cooking methodologies (A6.4-MEP016-A01 and A6.4-MEP016-A03).

In review of the proposed documentation submitted by the MEP to the SB, we have identified three key strategic problems which need to be addressed:

1) **Additionality**

The UN Sustainable Development Goals target 100% access to clean cooking by 2030. Yet, under the current design of the “Cooking Energy Transitions” methodology (A6.4-MEP016-A01), carbon finance becomes unavailable once technologies reach only 16% of the target market (20% in LDCs), or 4.5% under the simplified route. We consider this unacceptable.

Clean cooking adoption does not follow the same logic, or penetration curves, as electric vehicles in Europe. Even if modern fuels are “common practice” in cities (i.e. above 16% penetration), millions of the urban poor continue to lack access without carbon subsidies. Extensive academic evidence points to cost as a key barrier to accessing clean cooking, even among the urban poor. For example, a randomized control trial in urban Nairobi of BURN’s Jikokoa stove found that 3.5 years after the initial distribution of stoves, 90% of the control group households **still** didn’t own an improved stove.² This suggests that even families that live in a capital city where clean cooking adoption is rising, and whose neighbors have clean stoves, subsidies are essential to adoption.

We recommend edits to the methodology A6.4-MEP016-A01, to require that the common practice analysis (A6.4-AMT-001) is stratified by region, and income level, and ensures that no one is left behind in the household energy transition.

2) **Reversal Risk Buffer Pool**

There is no attributable causal pathway between a clean cooking activity and the later loss of woody biomass in the landscapes from which fuel is drawn. A cookstove credit represents carbon that is **kept out of the atmosphere**, not carbon held in an identified stand of trees. Every time less charcoal is burned, there is a one-time, one-way reduction in carbon emissions. If a fire or land clearance occurs, the impact of the reversal event is the same in the baseline and project scenario, but the project emission reductions remain. We have illustrated this by re-working Table 1 from the MEP’s Information Note (see Annex B).

Given the very high impact of this tool on carbon crediting for clean cooking, the bar for scientific justification should be set accordingly. By the MEP’s own assessment, 83 to 85 per cent of fuelwood stove reductions would be exposed; at a 50 per cent buffer, credits per household fall from 0.39 to 0.23 tCO₂e a year, and prices would need to rise by 71 to 74 per cent to compensate (Tables 3, 4 and 6). The tool that would set the buffer has not been approved, so investors cannot price it.

We ask the Supervisory Body **not to approve this tool** in its current form, and instead consider the following actions:

- Open the information note for stakeholder consultation, and return it to the MEP to address sector concerns;
- Exempt clean cooking projects from reversal risk assessment requirements in the interim;
- Amend the Reversals Standard so that paragraph 16(a) does not require a buffer for reservoirs the Standard itself deems unattributable, or add these activities to paragraph 7 as deemed not subject to reversal risk;
- Consider more appropriate treatment of clean cooking, which could include:

² Berkouwer and Dean (2023) Private actions in the presence of externalities: The health impacts of reducing air pollution peaks but not ambient exposure

- Fbuffer,i,t = 0 for activities that reduce demand for non-renewable biomass where all three conditions of STAN-METH-007 paragraph 13 are met. Record the rationale as absence of an attributable causal pathway;
- Adopt dynamic safeguards in place of a buffer, as the secretariat proposed in 2023 and Gold Standard now applies:
 - mandatory fNRB update at each crediting period renewal using A6.4-AMT-009;
 - a catastrophic disturbance check for the fNRB region at each renewal;
 - re-evaluation of the baseline where severe depletion of the fuel resource is confirmed.
- Commission an independent attribution study covering fNRB drivers and the feasibility of linking landscape loss to clean cooking activities;
- Pause the MEP's mandate to develop a reversal risk assessment tool until more scientific evidence is available.

3) Conservatism

In addition, we note that many of the concerns raised by project developers in the consultations for MEP 14 and MEP 15 have not been considered. In particular, the cumulative effect of several simultaneous discount mechanisms may result in over-conservatism (baseline benchmarks, usage caps, Hawthorne effect, annual baseline decay, BAU comparison caps, a 5:1 wood-to-charcoal-conversion, and now the buffer pool).

By the MEP's own analysis, credited reductions are only 34–53% of the central estimate before any buffer, and 25–70% lower than comparable methodologies (A6.4-MEP016-A04, Appendix). Several discounts target the same uncertainty - where two provisions address the same risk, only the more conservative should apply. We recommend further due diligence and assessment of the appropriate discounts.

We also have practical implementation concerns, and note differences between the application of the two cooking methodologies. While audio recording of every carbon waiver conversation has been made optional in A6.4-MEP016-A01, it remains mandatory in A6.4-MEP016-A03. Meanwhile, A01 contains new requirements for project developers to conduct Monte Carlo analyses. Please see our list of technical comments at Annex C.

We thank the Supervisory Body for its consideration of these views, and reiterate our commitment to working constructively with the MEP and the Supervisory Body toward methodologies that are both environmentally robust and capable of delivering the clean cooking transition that we urgently need.

Yours sincerely,



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Annex A. No attributable causal pathway between clean cooking and biomass reversals

There is no attributable causal pathway linking a clean cooking activity to the later loss of woody biomass in the landscapes from which fuel is drawn. Losses of that biomass are caused by fire, agricultural conversion, mining and third-party harvesting, which the activity neither causes nor influences. A deduction for "reversal" therefore prices an event that cannot be identified, measured or attributed to the credited tonne.

A1. What a cookstove A6.4ER represents

A cookstove A6.4ER certifies that a quantity of woodfuel was not burned in a monitored period. It does not certify that a specific quantity of carbon is held in a specific reservoir. The chain of evidence runs from the household outward: household fuel use is measured (kitchen performance tests, stove use monitors, surveys); fuel saved is multiplied by fNRB and an emission factor; and A6.4ERs are issued at the 10th-percentile confidence level. No link refers to a delineated stand of trees. The MEP accepts that the methodologies determine emission reductions indirectly, by quantifying the reduction in biomass consumption rather than monitoring carbon stocks (A6.4-MEP016-A04, paragraph 12(b)).

For forestry and geological storage the position is reversed. The credited tonne is identical to carbon held inside a boundary. If that carbon is lost, the credited tonne is lost. That is identity, not causation, and it is why reversal mechanisms were first developed for forestry activities (Perspectives Climate Group 2025, section 2.1).

For clean cooking, the fNRB ratio allocates the saving across a subnational, national or multinational region (A6.4-AMT-009). It does not locate it. The Reversals Standard's own reversal test, Equation 1, requires the stock in the activity scenario and the baseline scenario for each reservoir i at the start and end of each monitoring period. For a cookstove activity, none of those four terms can be defined, let alone measured.

A2. The causal and identification tests

- **Counterfactual.** The MEP's illustration shows one third of the landscape converted to cropland. That conversion is driven by agricultural demand and land tenure, and happens in both scenarios, meaning the emission reduction remains in both cases (see Annex B)
- **The drivers are independent and dominant.** The MEP lists wildfire, drought, conversion for agriculture and mining as the channels of loss (MEP016-A04, paragraphs 26 and 28). None is an activity-participant action. The MEP also acknowledges that country-level stock changes arise from "other drivers of carbon stocks losses" such as land conversion and natural disturbance (paragraph 12(b)). The secretariat reached the same conclusion in 2023: "other drivers such as agricultural land expansion may have greater influence on forest loss" (A6.4-SB007-AA-A16, paragraph 15(d)(ii)).
- **The identification test.** Even if some woodland is later lost, nobody can say that the lost carbon is the increment preserved by the activity rather than the baseline stock. The landscape is shared by millions of harvesters, charcoal producers and farmers. Perspectives Climate Group show that allocating a loss between just five developers sharing one well-defined geological reservoir has no settled answer (2025, section 3.5). In an open, multi-user landscape with no delineated boundary, allocation is indeterminate.
- **Reversal is a net concept.** The Standard defines a reversal as a net loss "calculated across all applicable greenhouse gas reservoir(s)" (STAN-METH-007, paragraph 3(j)). Perspectives Climate Group give the example of a stand where half burns but the remainder has doubled its stock: no net reversal occurs (2025, section 3.5). Reduced

harvest pressure lets degraded woodland regenerate. That regrowth is real, is not credited (MEP016-A04, footnote 6), and offsets losses in any net calculation.

- **Leakage is already separated out.** The MEP confirms that other users taking the saved wood is leakage, not reversal (paragraph 40). Once leakage is removed, the only remaining channel is exogenous loss from fire, conversion or third-party harvest. Those are exactly the losses the activity does not cause.

A3. Why the MEP's symmetry argument does not hold

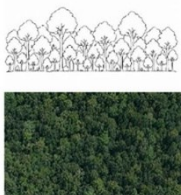
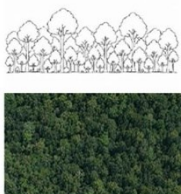
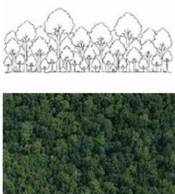
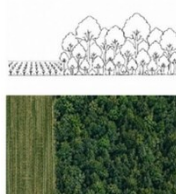
The MEP argues that if reversals cannot be attributed to clean cooking, neither can emission reductions (paragraph 20). The two rest on different evidence:

	Emission reduction	Claimed reversal
What causes it	The activity: a household burns less fuel	Third parties and nature: fire, farming, mining
Where the evidence sits	The household, monitored each period	A landscape nobody monitors or controls
How it is measured	KPTs, SUMs and surveys, verified by a DOE	Not measured; a default percentage applied ex ante
Role of fNRB	Splits a measured saving into renewable and non-renewable parts	None; the MEP confirms fNRB does not address reversal (paragraph 27)
Link to the credited tonne	Direct: the tonne is the verified saving	None: the lost carbon cannot be matched to the saving

The MEP's own analogy with grid electricity makes the point (paragraph 22). A grid emission factor attributes displaced generation to a renewable plant, but nobody treats a later coal-plant expansion on that grid as a "reversal" of the renewable plant's credits. Similarly, the Reversals Standard deems reduced fossil fuel combustion not subject to reversal (paragraph 7(a)), even though the fuel not burned remains available to be extracted later.

Annex B. Adjusted Information Note Table 1: how cookstove projects generate emission reductions

Adapted from A6.4-MEP016-A04, Table 1 (page 6). The MEP's version quantifies only the activity scenario; this version quantifies both, using the MEP's own assumptions.

	Time point 1: Start of the first crediting period	Time point 2: Year X of the crediting period	Time point 3: Immediately after year X	Analysis
Baseline scenario				200 t biomass burned for cooking: $200 \text{ t} \times 30\% \text{ fNRB} \times 0.5 \text{ t C/t} = 30 \text{ t C}$ of non-renewable carbon (110 tCO ₂) Crop clearing: 5 t C of forest lost (18 tCO ₂)
Article 6.4 activity scenario				100 t biomass burned for cooking: $100 \text{ t} \times 30\% \text{ fNRB} \times 0.5 \text{ t C/t} = 15 \text{ t C}$ of non-renewable carbon (55 tCO ₂) Crop clearing: 5 t C of forest lost (18 tCO ₂)
MEP Emission Reduction	The MEP Information Note Table 1 considers that clearing forest for cropland reverses 18 tCO ₂ of the project emissions.			
Adjusted Emission reduction	In fact, the crop clearing occurs in both scenarios, the impact of the reversal is zero. Cooking: $110 - 55 = 55 \text{ tCO}_2$ reduced. Crop clearing: $18 - 18 = 0 \text{ tCO}_2$. Regardless of the clearing, 55 tCO₂ is reduced. Assumptions as in A6.4-MEP016-A04, Table 1: 30% fNRB, 0.5 t C per t biomass, 44/12 to convert C to CO₂.			

Annex C. Technical recommendations

Additionality

- The 16 and 20 per cent common practice thresholds should be reconsidered in light of evidence of the financial barriers to accessing cookstoves. Assess common practice within the regions and income segments targeted by the activity (A6.4-MEP016-A01, paragraph 54).
- Any tax and duty exemptions now count as public finance and forces a full investment analysis (A6.4-MEP016-A01, paragraphs 32(b)(ii) and 51(f); A6.4-MEP016-A03, paragraphs 30 and 35). Only activity-specific public finance should trigger the comprehensive route.
- Assess retail-price condition (paragraph 39(h) of A6.4-MEP016-A01) ex ante at validation, not at every verification.

Conservativeness

- Where no justification is accepted, the flag still becomes a second cap at half the cap value (A6.4-MEP016-A01, paragraph 92). The flag should remain a disclosure trigger only, and groups should be defined by primary baseline fuel rather than location.
- Remove the 0.99 first-year factor, which duplicates the downward adjustment (A6.4-MEP016-A01, paragraph 140).
- Compare survey usage caps against the point estimate, not the 95/10 lower bound (A6.4-MEP016-A01, paragraphs 116–119), and do not apply the lower bound to SUM-measured usage (A6.4-MEP016-A03, paragraph 71).
- Replace the 25 per cent Hawthorne default, described by the MEP as an "intermediate value", with a phased default subject to review of the evidence.
- Adopt a 6:1 wood-to-charcoal ratio, consistent with the 5.8:1 literature review and 7.1:1 field average cited by the MEP (A6.4-MEP016-A01, Appendix 10, paragraph 21).

Practical implementation

- Continue to require metering of every device in the monitored-energy pathway, but allow representative sampling (A6.4-MEP016-A01, paragraphs 95 and 143). Collecting, transmitting and processing complete data from every device adds substantial cost in low-connectivity conditions - without adding integrity. Statistical integrity can be achieved from a robust random sample drawn from a fully metered population.
- Remove the requirement for Monte Carlo analysis at project level in A6.4-MEP016-A01 – it is unclear whether project developers have the capability to undertake this analysis. Instead apply Monte Carlo at methodology level, as already done for A6.4-MEP016-A03.
- Align A6.4-MEP016-A03 with changes already accepted in A01: one cooking event per week for user households; ex-ante fuel-consistency assessment (paragraph 13(b))
- Remove the requirement for audio recording of carbon waiver conversations and collection of national ID in A6.4-MEP016-A03, to align with changes accepted in A6.4-MEP016-A01.
- Correct drafting errors: in A01 the default Hawthorne factor expires on 31 December 2027 while SUMs become mandatory only on 1 January 2029 (paragraph 167), and Appendix 2 paragraphs 5 and 6 conflict; A03 contains unresolved tracked changes and inconsistent SUM dates (paragraph 13(k) and section 7.4.1).

References

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