

4C comments in response to [UNFCCC Call for input on SBM023](#) - annotated agenda and related annexes

The Clean Cooking and Climate Consortium (4C) thanks the MEP and SB for their consideration of CLEAR for A6.4. As you know, 4C has deep knowledge of the clean cooking sector, and the specific and unique challenges that clean cooking carbon projects face. We invested intensive research, consultation with additional carbon and clean cooking experts, and thoughtful consideration into the development of CLEAR. We ground these comments on that foundation.

Comments on the information note: Analysis of matters raised by the Supervisory Body at its 22nd meeting on the “Draft mechanism methodology: Energy efficiency measures in household cooking” ([A6.4-MEP016-A04](#))

4C welcomes MEP’s information note and considers it a well-written and thorough piece of work.

Regarding non-permanence risks, 4C would like to bring the following additional information to the SBM’s attention:

- The MEP explains in detail why, in its view, non-permanence risks should be taken into account for cookstove carbon projects. 4C would like to underscore the merit of the opposing view: ‘[Comment: Should cookstoves meet permanence requirements? The question Article 6.4 has yet to ask.](#)’ by Labbate (UNEP), Chen (University of Singapore) and Barata (Environmental Defense Fund)
- 4C would like to emphasize that a decision to subject clean cooking projects to permanence requirements would have far-reaching consequences for the clean cooking carbon market, and could render many clean cooking projects financially unviable.
- The information note addresses the implications of the non-permanence requirements in chapter 2.4. Table 4 illustrates the emission reduction estimates

per household after buffer pool deduction, as copied below:

Table 4. Comparison of Illustrative Emission Reductions Estimates per Household (t CO₂-eq / household-year) after buffer pool deduction

	Total emission reductions (t CO ₂ eq / household-year)		After contribution to the buffer pool account (t CO ₂ eq / household-year) ¹⁷					
Hypothetical activity	MEP014-A04	MEP015-A01	MEP014-A04			MEP015-A01		
Contribution to the buffer pool for reversal risk ($F_{\text{buffer},i,t}$) in per centage	NA		10	30	50	10	30	50
Fuelwood efficiency	0.39	0.38	0.36	0.29	0.23	0.35	0.29	0.22
Charcoal efficiency	0.35	0.30	0.33	0.29	0.26	0.28	0.25	0.22
Charcoal to Electricity	NA	0.84	NA	NA	NA	0.79	0.71	0.63

- 4C would like to point out that, according to this table, the implementation of the reversal risk alone could lead to a deduction of up to 42% of the emission reductions of a cookstove project. As noted above, this would effectively render many projects financially unviable.

Draft methodological tool: Reversal risk assessment (A6.4-MEP016-A07)

Section no. (as indicated in the document)
General
Paragraph/Table/Figure no. (as indicated in the document)
General
Comment (including justification for change)
4C notes that: - The MEP commissioned its own modelling, developed a reversal risk assessment tool, and subsequently ran a public comment period. - Some 36 different stakeholders submitted thoughtful critiques via public comments. - No meaningful changes in the tool or default values were implemented. - Valid criticism, such as the use of unrepresentative datasets in the tool, was dismissed on the basis that the commenter did not produce alternative scientific data or evidence.

- Development of a validated alternative dataset or method would be impossible to undertake in a 3-4 week commenting response window.

4C sees a significant risk of institutional tunnel vision and is concerned that the MEP is closing itself off to the possibility that, as 4C firmly believes, the chosen approach is not appropriate for the purpose it is meant to serve.

4C believes that a comment process that discards criticism on the basis that the commenter does not provide an alternative is not a sound process, and does not follow the Conference of the Parties requests that the methodological standards and tools be “informed by robust evidence”.

4C reiterates that the implementation of the current tool may have a very significant impact on the viability of clean cooking projects under Article 6.4.

4C strongly feels that:

- given the potentially very high impact of this tool, the bar for scientific justification and evidence should be set at a level appropriate to that impact;
- the current tool is not sufficiently backed by science that meets this bar, nor informed by robust evidence in the sense required by the COP; and
- the potential devastating impact of this tool is not proportional to the risk it is meant to address.

4C therefore urges the SBM not to approve this tool in its current form, and instead either exempt clean cooking projects from reversal risk assessment requirements, or adopt a significantly less impactful interim measure, such as a general clean cooking reversal risk discount between 0% and 5%, until the underlying science has advanced sufficiently to support a more granular and evidence-based tool.

This would avoid further delaying the approval of otherwise well-balanced clean cooking methodologies.

4C also invites the SBM to consider pausing the MEP’s mandate to develop a reversal risk assessment tool until more scientific evidence is available.

Proposed change (including proposed text)

Reject this tool in its current form, and instead adopt a significantly less impactful interim measure, such as a general discount for between 0% and 5%, until the underlying science has advanced sufficiently to support a more granular tool.

Consider pausing the MEP’s mandate to develop a reversal risk assessment tool until more scientific evidence is available.