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Information note

Summary of the comments received from stakeholders on the draft methodological tool “Analysis of lock-in risk” from the call for public inputs to annexes of the MEP 011 meeting documents

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1. Introduction

1. This note provides a summary of the views submitted by stakeholders in response to the call for public inputs to the draft version of the methodological tool: Analysis of lock-in risk contained in Annexes 1 to the meeting report of the eleventh meeting of the Methodological Expert Panel (MEP 011).

2. The call for public inputs was open between 04 to 25 February 2026, and a total of 9 submissions were received. The full list of submissions can be found in the appendix to this note.

2. Summary of views to the draft methodological tool "Analysis of lock-in risk"

3. The following sections summarize the views expressed in the submissions.

2.1. Cover Note

4. Main points for consideration:

   (a) Introduce proportionality and flexibility for the application of the tool: Apply simplified or tiered requirements based on project size, sector, and host country capacity (especially for LDCs and small-scale projects).

   (b) Refine lifetime thresholds: Replace the uniform 10-year cutoff with sector-specific guidance and provide default lifetime tables to reduce reliance on costly expert assessments.

   (c) Limit alternatives to realistically implementable options: Require that comparable alternatives be commercially, financially, and institutionally feasible in the relevant national/regional context — not just theoretically available.

   (d) Align GHG intensity thresholds with national pathways: Allow GHG intensity thresholds to reflect NDCs, LT-LEDS, and sectoral transition strategies rather than rigid percentile benchmarks.

   (e) Allow conditional treatment of transitional technologies: Permit high-efficiency or improvement-over-BAU projects where aligned with national transition plans. This could be combined with shorter crediting periods or stronger baseline adjustments.

   (f) Simplify or remove the resource abundance test: Avoid complex renewal/depletion assessments where reliable data does not exist; allow use of default indicators or host Party confirmation instead.

   (g) Product crowding out: This could be better addressed through technology eligibility criteria defined in methodologies.

   (h) Adopt a dynamic, evidence-based scale assessment: Assess real displacement risk using market planning documents and investment pipelines rather than static market-share thresholds.

(i) Expand applicability to retrofits and upgrades: Prioritize inclusion of retrofit/refurbishment activities, which represent a major mitigation opportunity in developing countries [1]

5. The Cover Note correctly summarizes the intent and structure of the proposed tool. However, it does not sufficiently acknowledge sectoral diversity or the role of transitional mitigation activities, particularly in hard-to-abate sectors such as maritime transport and port infrastructure. Without such clarification, there is a risk that the tool may be interpreted in a manner that discourages early mitigation actions that are compatible with long-term decarbonization pathways. Explicit reference to proportionality and risk-based application would improve clarity for stakeholders while maintaining environmental integrity. Add the following sentence at the end of paragraph 6 or paragraph 14 "In applying the four assessment steps, due consideration should be given to sector-specific transition pathways, capital stock turnover rates, and the role of early and transitional mitigation activities, particularly in hard-to-abate sectors, in order to ensure a proportionate and risk-based assessment of lock-in risk." [9]

6. To allow for consistency in authorisation and approval across host Parties, the Lock-in Risk Tool can include consideration of host Party long-term decarbonization policies and commitments—including NDCs and LT-LEDS where available—in addition to the technical parameters already identified (e.g. lifetime and emissions intensity). Incorporating such considerations could strengthen alignment between the lock-in risk assessment and the broader Article 6.4 requirement that activities not constrain, but align with, host Party climate strategies, and could help reduce the risk of uneven treatment of similar project types across different host Parties. Under A6.4-AMM-001, the demonstration of consistency with the host Party's long-term climate objectives is primarily addressed through the host Party approval and the associated DNA confirmation submitted with the PDD. This approach relies on host Party assessments to demonstrate that the activity does not constrain, and aligns with, the implementation of the host Party's NDC and, where applicable, its LT-LEDS. However, DNAs of Parties may interpret parameters differently, which may result in different outcomes for similar project activity types across jurisdictions. For example, a project involving internal combustion vehicles could be considered inconsistent with a host Party's LT-LEDS that envisages a phase-out of fossil fuel vehicles, while a similar project might be approved by another host Party with comparable long-term objectives but a different interpretation or application of the approval criteria. The Lock-in Risk Tool needs to make clear the scope of consideration of host Party long-term policy trajectories—such as LT-LEDS or sectoral decarbonization targets under the NDC. [6]

7. Efficiency improvements within an existing transition fuel (e.g. LPG stove replacement with higher-efficiency LPG) reduce emissions intensity and should remain eligible. These activities do not extend fuel persistence beyond baseline. Add clause: 'Efficiency improvements within an existing cooking fuel, including retrofit or replacement with higher-efficiency devices, shall be considered eligible mitigation activities.' [3]

8. For cooking systems, manufacturer responsibility and crediting incentive end with device life. Continued fuel use after device failure lies outside project boundary and cannot be attributed to the activity. Define: 'Activity lifetime for distributed cooking technologies equals the operational lifetime of the provided cooking system [3]

9. LPG is recognised in many national clean cooking strategies as a transition pathway delivering large emission and health benefits relative to biomass and charcoal. Excluding

LPG would conflict with national transitions. Add recognition: If an activity is recognised by host party as part of their NDC or authorised then the activity can skip the lock-in risk analysis. [3]

10. Lock-in analysis should not delay access to clean cooking in LDCs where electricity is not reliably available and LPG offers the most feasible emission and health improvements. Assessment shall consider realistic technology availability and energy access constraints in LDC and developing country contexts. Excluding LPG transitions risks slowing emission reduction and SDG7 progress for low-income households with limited energy options. Mitigation activities improving clean cooking access and reducing emissions for underserved households shall not be deemed non-additional solely due to inaccessible future alternatives. [3]

11. The F lock-in factors need to be adjusted for context. Particularly, as the lowest-GHG alternative in the cooking sector is typically electric induction, other fuels will almost always fall above the implied threshold when compared to that benchmark. This would effectively disqualify build infrastructure for other fuels through Article 6.4 credits in most country contexts — even where alternative fuels represent a major improvement over the existing baseline of wood and charcoal use. The tool does not appear to account for contexts where the lowest-GHG alternative is not commercially available or economically accessible to the relevant user population. Amend Table 1 to allow mechanism methodologies serving energy-poor households to apply a differentiated Flock-in value, or to specify that the lowest-GHG alternative must be commercially available and economically accessible in the project region within a reasonable timeframe. Suggested text addition: 'Where the mechanism methodology demonstrates that the lowest-GHG alternative is not commercially available or economically accessible to project participants within [10] years of the activity start date, the mechanism methodology may propose an adjusted F lock-in value supported by a reasoned justification.' [4]

12. The inclusion of alternatives that could be implemented by third parties (Case ii) is problematic when applied to clean cooking projects in low- and middle-income country settings. The premise — that a project participant's choice locks out a lower-emitting technology another party could otherwise deploy — does not hold well where grid infrastructure, supply chains, and end-user affordability constraints make those alternatives effectively unavailable for the foreseeable future. Applying Case ii to LPG projects would create a situation where credits are denied based on the theoretical availability of induction stoves that are not, in practice, a realistic near-term option for the target beneficiaries. Clarify that Case ii applies only where there is credible evidence that third-party alternatives could realistically be deployed in the same project region and timeframe. Suggested text: 'When applying Case ii, the mechanism methodology shall specify criteria for assessing whether the identified third-party alternatives are commercially and logistically feasible within the project region and within [10] years of the activity start date. Where this cannot be demonstrated, only Case i alternatives shall be considered.' [4]

13. The tool does not differentiate between activity types by scale, population served, or development context. A clean cooking project reaching tens of thousands of households in rural sub-Saharan Africa is treated under the same framework as large-scale industrial infrastructure. For cooking energy transitions specifically, the human development co-benefits — reductions in indoor air pollution, time savings, gender equity impacts — are central to the rationale for crediting. The current design of the tool risks making it

systematically harder to finance the clean cooking projects that are most needed in the hardest-to-reach communities, by applying a lock-in standard calibrated primarily for energy infrastructure of a different character. Request that the MEP consider whether a separate or simplified pathway for specific activities serving low-income populations. Suggested text: 'For mechanism methodologies serving low-income households in low- and middle-income countries, the methodology may propose alternative approaches to steps 1–4 of this tool, subject to approval by the Supervisory Body, where the standard thresholds are demonstrated to be inappropriate given the activity context.' [4]

14. The risk of lock-in emissions exists primarily for projects with high upfront capital investment, immobile, long-lived infrastructure, and high switching costs. Project operators are contractually or economically obligated to use the infrastructure or technology for its lifetime in order to ensure that upfront costs are reimbursed, and returns are generated as expected. Clean cooking projects do not have these characteristics. At the household level, the capital involved is relatively low, and appliances have short replacement cycles. Moreover, households have a much more dynamic approach to deciding when and how to replace their cooking appliances. While liquidity and credit obligations or constraints may be one factor, many other dimensions influence this decision, including family size, home location, fuel and technology availability, education, etc. Therefore, households routinely re-evaluate their cooking technology choices, and carbon projects can influence these decisions through behavior change, subsidies, incentives, etc. [2]

15. At the energy system level, even transitional cooking fuels do not entail the type of immobile, high-capital infrastructure typically associated with fossil fuels lock-in. Distribution networks are modular and low-capital, and markets for transitional cooking fuels are small relative to national energy systems. Moreover, electrification and grid expansion timelines are typically driven by infrastructure investment cycles, not by stove adoption patterns, making it highly unlikely that the adoption of transitional cooking solutions crowds out electric cooking. In general, therefore, there is very limited risk of lock-in emissions in the cookstove context, while the greater empirical risk is backsliding to high-emitting polluting fuels due to affordability concerns, supply instability, or household circumstances. [2]

16. Clean cooking appliances typically have an operational lifespan below the ten-year threshold and would therefore be outside the scope of lock-in risks defined in the current methodological tool. However, we recommend that cookstove carbon projects should be explicitly exempt from lock-in emissions risk assessments for the reasons given above. This ensures regulatory clarity and avoids unnecessary technical debates. [2]

2.2. Introduction

17. The Introduction clearly defines the purpose of the tool but could further guide consistent interpretation by recognizing that lock-in risk must be assessed in the context of realistic technology transition pathways. In sectors where zero-emission solutions are not yet widely available or scalable, early mitigation measures may enable, rather than hinder, long-term alignment with the Paris Agreement. Clarifying this point would reduce interpretative ambiguity for activity participants and assessors. Insert a new paragraph after paragraph 5: "The assessment of lock-in risk should take into account realistic technology transition pathways and investment cycles across different sectors. In sectors where zero- or near-zero-emission solutions are still emerging, mitigation activities that deliver measurable emission reductions while enabling future deployment of lower-

emission technologies should be distinguished from activities that risk locking in technologies incompatible with long-term climate goals." [9]

2.3. Definitions

18. The current definition appropriately distinguishes operational lifetime from technical lifetime but could better reflect sectors where operational lifetimes are strongly influenced by regulatory change, international standards, and retrofit practices. This is particularly relevant for maritime transport and port-related activities, where assets may be repurposed, upgraded, or phased out well before the end of their technical lifetime. Explicit recognition of these dynamics would support more accurate lock-in risk assessments. Amend paragraph 5(d) as follows: "Operational lifetime: The period during which a technology, measure, or practice is expected to remain in operation from the date of its first commissioning, considering not only its technical lifetime, where applicable, but also its economic viability, regulatory environment, international standards, retrofit or repurposing potential, user preferences, and market or policy conditions." [9]

2.4. Applicability

19. The applicability criteria appropriately limit the tool to greenfield, project-level activities. However, in sectors such as maritime transport, many mitigation activities are asset-specific or site-specific and produce outputs that are not readily substitutable by third parties. Without clarification, the applicability provisions may lead to unrealistic assumptions regarding market-wide displacement or substitution in subsequent assessment steps. Add the following clarification at the end of paragraph 10 or as a new paragraph 10(i): "Where the outputs of an Article 6.4 activity are asset-specific, site-specific, or operationally constrained, and cannot reasonably be supplied by other actors without significant structural changes, assumptions regarding market-wide displacement or substitution by third parties should be applied with caution in subsequent lock-in risk assessments." [9]

20. The requirement state "only applicable to activities that generate at least one measurable output". here, I think it is a bit clear if output means a product (e.g., less GHG intensive cement) or service (e.g., public transportation). If this true, kindly add footnote for better clarification. Does this also mean that typical projects that lead to no output does not need to go through this? e.g., destruction of HFCs? Where projects such as carbon capture (DACCS or BECCS), there is no output of a product, but only CO2 that is going deep into Mother Earth. so such projects are also exempt? This is different projects such as CO2 infused concrete. This requirement also seems to be a bit weird, e.g., 1 projects that include only flaring of landfill are not required to use this tool - as there is no output of a product or service. But for projects that include landfill flare and electricity production need demonstrate that there is no-lock in analysis? E.g., 2: is there are projects that are capturing and destroying coal bed methane - since there is no output, the project does not do go though the troubles of lock-in analysis but if project is also producing electricity, it needs to go through the trouble? if the above is true (and I think it is, by the way it is written), this is not really promoting more actions to reduce GHG emissions. Either remove this requirement or update based on above comment please. [7]

21. Requirement to identify lowest-emission alternatives including third-party or future options is impractical in household cooking contexts where accessibility depends on infrastructure, affordability and policy beyond project control. Clarify that comparable alternatives refer to

technologies realistically accessible and deployable for the target households under prevailing infrastructure and affordability conditions. Options not practically available within the project context should not be treated as comparable. [3]

22. It is indicated that the 'methodological tool is applicable to Article 6.4 activities where its use is explicitly referenced in the applicable mechanism methodology'. However, later it is also cited that mechanism methodologies provide further specifications and requirements. The use case of the tool appears to be rather limited and that it does not provide sufficient details for its usage. [1]

2.5. Normative and informative references

23. The use of existing methodological standards and tools is appropriate. For sectors governed by internationally harmonized regulatory frameworks, such as maritime transport, additional contextual recognition of relevant international standards and strategies could support consistent interpretation without creating new normative obligations. Add a new sub-paragraph under paragraph 14: "(c) Internationally harmonized sectoral standards and strategies, where relevant, may be used as informative context to support the determination of lifetimes, operational constraints, and transition pathways, provided that such references do not override the normative requirements of the Article 6.4 mechanism." [9]

2.6. General requirements

24. This tool should include technologies that can be classified as "positive list". Such technologies should include but not limited to renewable energy (such as grid connected or off grid solar PV - e.g., ACM0002 or electrification of communities methodologies), removals technologies such as Direct Air Capture (because either there is DAC or there is not. there is not alternative). This list should also consider host country eligible activities. The inclusion of positive list a must - this is because, it would encourage developers to not go through extra step of lock-in analysis and will prefer to do projects that are in positive light. Plus, any sort of standardisation for such as subjective topics is crucial to prevent gaming. [Note - I can personally think of many instances where I can game in project as per the requirements established in the draft tool] Step 0: The methodological tool includes positive list as follows:

    (a) Activities including Grid connected or off grid renewable energy such as solar PV with or without energy storage, wind, hydro, geothermal, tidal and wave.

    (b) Activities listed as "positive list" and submitted by the host country to UNFCCC as host country requirements. It is assumed that for these technologies the host country has conducted any potential lock-in risk analysis and this list considers any host country circumstances.

    (c) Activities that include energy efficiency in residential or commercial settings that are not directly linked to fossil fuel combustion. These technologies include replacement of devices such as motors, air conditioning systems, lighting devices and electric cooking devices and electric water filtration devices whose functioning does not have direct connection (physical connection) with fossil fuel combustion. These technologies shall be powered by grid connected electricity or directly via renewable energy sources. (For grid connection, it is assumed that as per country's NDC, the grid will get cleaner). [I have also added this because, these types of

activities are inherently leading to better resource efficiency]. I have not added activities such as efficiency of engines of trucks because that depends highly on national circumstances and technology availability.

(d) Projects that directly substitute fossil fuel with other source of energy. E.g., coal with biomass or gasoline with ethanol. (do not worry on biomass, as sustainability and excess presence would be defined in the biomass accounting tool).

(e) Novel activities such as Direct Air Capture, Enhanced Rock Weathering, etc.

(f) Activities that involve capture and destruction of "super pollutants" such as refrigerants.

(g) if the technology does not fall into positive list as in step 0 - following procedures as below. [7]

2.6.1. Step 1: Technical or operational lifetime assessment

25. Remove the 10 years requirements for critical projects such as cookstoves - either add in positive list above with clause in methodologies on technology graduation. (in many countries, it can anyway be addressed if the host country has provided list of eligible activities in PACM or a positive list). I can understand, that these requirements are done so that projects such as cookstoves do not fall into the trap. Because, for sure, if you remove this 10 years timeline requirements, and require the usual improved thermal efficiency cookstoves, they might never pass this test for sure, as electric and metered devices would be deemed better than this. But, this has to be seen from another lens too. E.g., many pyrolysis have lifetime between 5-15 years. so by this logic, if I choose a machine that has lifetime of 11 years and go through mini research project using the tool. But, if I choose a machine that has technical lifetime as prescribed by manufacturer as 9 years and 11 months, I am fine. From a circular economy perspective, if the machine can be used (efficiently) for more time, the better it is. Such requirement should promote that. This requirement does not seem to be. Even for ICS - they can have typical operational years of 5 years and after that they would need to be replaced. [7]

26. However, in the case above of pyrolysis, the crediting period would end at lifetime of the machine but for ICS, the crediting period would continue. In such cases, there should be a requirement of technology graduation (depending on commercial availability of the technology) where the replaced cookstove should be better efficiency than the previous. Also, third angle: if I use energy efficiency measure in coal power plants for 5 years, this tool is not valid (even if in future it becomes eligible for brownfield projects) but building biomass fired power plant would need to go through this. This requirement may not really fit well for projects with measures or practices are much longer - e.g., ARR on barren land, agroforestry, AWD projects, SOC increase projects. I do not think that they should be really going through things such as GHG intensity comparison as in Step 2. Of course, even in these activities, there has to be safeguards – environmental and social – but that can be addressed either via SD tool or via applicability conditions in the methodology (preventing monoculture in certain scenarios, etc). [7]

27. The tool should clarify that, for distributed household energy technologies, the technical or operational lifetime refers to the lifetime of the incentivised device system rather than persistence of household behaviour after device failure. Otherwise LPG transitions may be incorrectly treated as long-term lock-in despite finite device intervention. Add

clarification: 'For distributed household technologies such as cooking devices, activity lifetime shall correspond to the operational lifetime of the credited device system provided by the activity. [3]

28. Climate policy should not incentivise reduced durability. Lock-in risk should relate to crediting duration, not product lifespan. Durable devices should not be penalised. Add clarification: "Longer device durability shall not increase lock-in risk where crediting duration remains bounded within the intervention timeframe." [3]

29. It is cited that 'In some cases, there may be more than one main technology, measure or practice relevant for lock-in risk analysis (for example a dam and a turbine in the case of a hydro power plant), in which case the lock-in risk analysis shall be carried out separately for each one in accordance with the relevant guidance provided in the mechanism methodology'. Such sort of examples and going into the component level takes away the attention from lock-in risk context and rather make the tool unviable for application at project level. Relevant example types where the application of the tool is envisaged should be provided. [1]

30. Activities with lifetime less or equal to 10 years do not have a lock-in risk, and activities with lifetime of more than 10 years prompts for lock-in risk being assessed through further steps. It would be good to also define positive and/or negative list wherein lock-in risk analysis is to either not to be performed or necessarily performed. Allow methodologies to justify alternative thresholds. Include default technical lifetimes for common technologies. Including further examples of positive/negative list of activities. Also, clarify if this applied equally across sectors (energy, agriculture, waste, transport etc). Also, clarify how this interacts with crediting period choices. [1]

2.6.2. Step 2: Greenhouse gas intensity assessment

31. The mandatory inclusion of third-party alternatives may require speculative assumptions in sectors with asset-specific investments, such as maritime transport. In addition, uniform GHG intensity thresholds may not adequately reflect transitional pathways. a. Amend paragraph 21(c) as follows: "Where the applicable mechanism methodology explicitly justifies their relevance, alternatives implemented through public works or by third parties." Add the following sentence to paragraph 26 or footnote 13: "Mechanism methodologies are encouraged to define sector-specific values or approaches, including the use of downward adjustment mechanisms, where this better reflects realistic transition pathways." [9]

32. Logically, if the baseline approach used is "BAT" or "performance benchmark", the activity should not be required to do GHG intensity assessment. This will promote standardised forms of baseline and additionality demonstration. Add a paragraph before 19. "Where the activity uses Best Available Technology or Performance Benchmark to define baseline, the 6.4activity is not required to conduct GHG intensity assessment". [7]

33. From the section, it is not clear what really constitutes GHG intensity (or maybe my interpretation is not up to the mark). What does it mean from the two?

    (a) net GHG emission reduction per unit of output; or

    (b) project + leakage emissions per unit of output.

34. Ideally, it should be (a), but that would also mean that to assess alternatives - the activity is required to have detailed LCAs for many alternatives to be compared to the activity. However for this, I am assuming (a), if it is really B. The rule can be simple - the project emissions shall not be more than [10] or [20] % of the net GHG emissions reduction or removals. [7]

35. This requirement shall also include, the host country/national circumstances and where relevant local circumstances. This could include identifying situations or scenarios where the intensity of only relevant technologies/measures/practices need to be compared and not really all commercially and financially viable alternatives. E.g., Farm equipment maybe commercially available. however, in the context of the host country (e.g. India) the typical land holding size is very small. Hence, this as alternative to project to reduce GHG emissions shall not be included. The activity participant shall also describe and refer to national and/or local circumstances that are essential for consideration of alternative technologies, measures and practices such as it represents real and practical project circumstances. Consideration of host country circumstances is also required as per additionality standard (and I think RMPs too?). It is critical to ensure that geographies (e.g., LDCs) where carbon finance goes a long way, these geographies are not punitively excluded by typical mathematical/statistical assessments. The activity participant shall also describe and refer to national and/or local circumstances that are essential for consideration of alternative technologies, measures and practices such as it represents real and practical project circumstances. [7]

36. It is requested that, such forward looking requirements are not included. These are very theoretical and does not represent reality. E.g., Previous Electric Vehicle policy of Delhi wanted 25% of all new vehicles sold to electric. This was seen very possible due to strong incentives by the government and increasing options for buyers in various categories at that time. However, even in 2026, the penetration in vehicles such as Cars is barely 8-10% in Delhi, whereas national penetration is about 4-5% for cars. If this would have been evaluated, in theory, alternative available that have much better infrastructure in Delhi such as CNG would have not been taken by fleet buyers. Future seeing assessments may not always see reality of the project. removal of forward-looking requirement in 21(b). [7]

37. I am unsure if this equation really works. If it does, the document should include an example (probably a real case?). Addition of an example for paragraph 25 and equation 1. [7]

38. As an alternative, if the net GHG emissions reductions or removals per unit are better than alternatives as compared from national values, global values or using defaults, this equation is perhaps not required. It is to be noted that, whether this should be based on actual process E.g.. if the alternatives to composting of waste includes using waste biomass as feedstock for electricity/heat or using waste biomass as fuel (e.g., through briquettes). GHG intensity should be compared amongst composting vs electricity vs briquettes. Of course, it should be based on national circumstances - e.g., if there is a lack of grid connection in the region, biomass for electricity to be provided for the grid can not be used (hence the relevance of national or host country circumstances as mentioned before). Addition of approach, where the net GHG emissions reduction or removals per unit of out (e.g., tCO2e removals per hectare of land) is higher than alternatives. This can be compared with values available at national level, peer reviewed research papers or global defaults. [7]

39. If LT-LEDs/NDC define a declining emissions pathway for the sector, then GIBAU could reflect projected intensity consistent with the host Party’s LT-LED (GILT-LEDs) instead of historical BAU. Then Equation (1) becomes: GIthreshold=GIlowest+Flockin×(GIBAU OR GILT-LED−GIlowest) [6]

40. Suggest setting out factor F as a continuous function of the declared technical lifetime of the activity. This would avoid cliff-edge effects and reduce incentives for strategic lifetime optimization, while preserving the conceptual relationship between lifetime and lock-in risk. Instead of a table, the MEP could adopt a simple formula where “F” decreases smoothly as lifetime “L” increases. A possible function for “L > 10” would be: “Flock-in = (max(0.2, 1 - 0.04 x (L - 10)) This specific formula would replicate the current "start" (1.0 at 10 years) and "end" (0.2 at 30 years) but remove the jumps. [6]

41. The tool compares the proposed activity's GHG intensity against the lowest-intensity alternative available — but does not appear to require that comparison to be made against a realistic baseline. For clean cooking projects, the relevant baseline is typically wood or charcoal combustion. Anchoring the lock-in assessment solely to the lowest-GHG alternative, without reference to the baseline scenario, may produce conclusions that are technically correct but practically misleading: a technology that achieves 70–80% emission reductions relative to BAU could still be deemed to have lock-in risk. Introduce an additional consideration in Step 2 that accounts for the magnitude of emission reductions relative to the BAU scenario, not only relative to the lowest-GHG alternative. Suggested text: 'In cases where the proposed Article 6.4 activity achieves a GHG intensity reduction of at least [X]% relative to the BAU scenario, the mechanism methodology may propose a modified GIthreshold, provided that a reasoned justification is submitted demonstrating that the activity does not materially prevent lower-GHG alternatives from being deployed.' [4]

42. The bracketed text in paragraph 21(b) proposes that the list of alternatives include technologies 'that can be reasonably expected to be implemented within the next [5] years.' For clean cooking in low-income settings, this provision could bring electric cooking into scope as a comparator, even in contexts where grid reliability, appliance affordability, and consumer acceptance remain significant barriers. A 5-year horizon is insufficient to capture the structural constraints that make other fuels a more realistic near-term option than electricity-based cooking in many project regions. The MEP's request for stakeholder views on this bracketed text is therefore particularly important for the clean cooking sector. In response to the MEP's request for stakeholder views: the forward-looking alternatives provision should either be removed or refined so that only alternatives with demonstrated commercial viability in the specific project region and socioeconomic context are included. Suggested text: 'Alternatives expected to be implemented within [5] years shall only be included where the mechanism methodology demonstrates that such alternatives are commercially available, affordable to end-users, and supported by adequate infrastructure in the project region.' [4]

43. It is cited that ‘Activity participants shall compile a list of all credible alternatives that are comparable with the proposed Article 6.4 activity’. However, it is also to be noted that lock-in risk analysis is a part of the additionality steps, and the alternatives are already defined in the previous steps of additionality assessment. The alternatives herein should be the same as considered in the start of the additionality assessment. The alternatives should be available under prevailing market, infrastructure, regulatory and financing conditions in the relevant boundary considered. [1]

44. It is cited that 'The MEP is further considering the utility of analysing technologies, measures or practices that may be implemented in the future and requests stakeholders to kindly provide inputs on the proposed text in brackets'. However, it is also to be noted that lock-in risk analysis is a part of the additionality steps, and the alternatives are already defined in the previous steps of additionality assessment. The alternatives herein should be the same as considered in the start of the additionality assessment. Also, the aspect of additionality reassessment at the time of renewal and in particular lock-in risk reassessment should also be clarified. [1]

45. It is cited that 'Activity participants shall calculate the greenhouse gas intensity of the alternative …'. However, no details of how to calculate the GHG intensity is provided. Example(s) or basis of calculating the GHG intensity should be provided. [1]

2.6.3. Step 3: Resource use efficiency assessment

46. Duplicative policy assessments at project level may increase transaction costs without improving environmental outcomes. Host Party authorization already reflects national policy priorities. Replace Option 1 text in paragraphs 29–31 with: "The assessment of whether a resource is substantial for mitigating climate change or achieving other policy objectives is deemed to be addressed through host Party authorization and approval of the Article 6.4 activity, unless otherwise specified in the applicable mechanism methodology." [9]

47. While defining abundance, the MEP may want to specify the boundaries and time horizon that may need to be considered in this assessment. Reason: resources constraints may change overtime and may be location specific. [8]

48. The definition and assessment of abundance may benefit from clearer specification of system boundaries and an explicit time horizon, as resource availability may vary over time (e.g. changes in water availability due to hydrological conditions). A clearer definition of abundance could prevent leaving the interpretation of abundance up to the activity participants. "The assessment of abundance shall consider whether the type of resource is renewed at a rate which is greater than the rate of its depletion, in the absence of the proposed Article 6.4 activity and with the implementation of the proposed Article 6.4 activity, across the crediting period of the activity and within the physical boundaries of the proposed Article 6.4 activity." [6]

49. The resource use efficiency step creates uncertainty for projects by leaving open the question of whether certain fuels would be classified as a resource that is 'substantial for mitigating climate change.' If so, projects would need to proceed to further analysis, adding cost and uncertainty. Simultaneously, Option 2 contains no normative text at all, meaning the outcome of this step may depend entirely on host Party authorization — which is an appropriate safeguard in some contexts, but may not be consistently applied across countries with varying institutional capacity. The current ambiguity creates a material barrier to project development and financing. Clarify the treatment of transitional fuels under Step 3, and provide more substantive guidance under Option 2. Suggested text: 'For transitional fuels used in clean cooking activities serving energy-poor households, mechanism methodologies shall specify criteria for determining resource abundance and relevance to climate objectives, taking into account the scale of the activity relative to national fuel supply and the absence of commercially viable lower-GHG alternatives for the target population.' [4]

50. It is cited that 'Under step 3, activity participants shall assess the use of resources by the proposed Article 6.4 activity to determine whether the activity involves a technology or practice that constitutes an inefficient use of resources that are substantial for mitigating climate change or achieving other policy objectives'. However, further details on this are mostly parked in the mechanism methodology. To ensure workable usage of the tool further details or examples on the resource use efficiency assessment should be provided. [1]

51. The application of the step itself may not be relevant for several activity types. It would be helpful if the step 3 application for the certain type of activities is presented. Alternately, the type of activities wherein the Step 3 is not relevant could as well be cited. [1]

52. Reference to revenues from A6.4 ERs is cited. Noting that lock-in risk assessment is part of the additionality related steps and that the additionality demonstration not necessarily requires revenue consideration of A6.4 ERs and also that there is high uncertainty regarding the same, it should be excluded. [1]

53. Reference to investment analysis and barrier analysis along with incentives from the Article 6.4 activity are cited. However, as lock-in risk analysis is a sequential prior step to investment analysis and/or barrier analysis the flow is to be checked and corrected. The sequential step flow of additionality assessment is to be followed. [1]

2.6.4. Step 4: Scale assessment

54. Scale assessment is not equally relevant across all sectors. For vessel-specific and port-specific maritime activities, outputs are geographically constrained and non-fungible. Add a new paragraph after paragraph 41: "For activities with vessel-specific, facility-specific, or otherwise non-fungible outputs, scale assessment may be deemed not applicable, as such activities do not reasonably prevent the supply of lower-emission outputs by others." [9]

55. Option 1 does not provide sufficient details for performing the scale assessment and thus not helpful. Option 2 wherein scale assessment if relevant gets defined at the methodology level. [1]

Appendix. List of submissions

1. The following table contains the list of submissions used in this information note.

Table 1. List of submissions received

Submission #	Stakeholder	Submission date
1	World Bank	25 February 2026
2	Clean Cooking and Climate Consortium (4C)	25 February 2026
3	The Project Developer Forum (PD Forum)	24 February 2026
4	Columbia University UC Berkeley Carbon Trading Project	24 February 2026
5	BURN manufacturing	24 February 2026
6	The Integrity Council for the Voluntary Carbon Market	23 February 2026
7	Climate Spring	21 February 2026
8	CAEX Consultoria	10 February 2026
9	The House of Shipping	08 February 2026

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Document information

Version	*Date*	*Description*
01.0	06 March 2026	Compilation of inputs from stakeholders by the secretariat.

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