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| *Name of submitter* | Barbara Haya |
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| *Reference number of proposed new methodology or methodological tool* | A6.4-PNM004 |
| *Based on an assessment of information in the A6.4-FORM-METH-002 and its application in sections A to C of the submitted draft project design document (A6.4-FORM-AC-020), provide your comments to the proposed new methodology using the tabular format below. Please indicate the sections or issues to which your comments refer to.* | |
| *Date received by the secretariat* | 6 July 2025 |

| **#** | **Section / Para no./ Annex / Figure / Table** | **Type of comment**  **ge** = general  **te** = technical  **ed** = editorial | **Comment**  **(including justification for change)** | **Proposed change**  **(including proposed text)** |
| --- | --- | --- | --- | --- |
|  |  | ge | The CLEAR Methodology does a commendable job addressing the major sources of over-crediting from prior methodologies. Below I note some suggestions for improvement (the first section below) along with some key advancements already included (the second section below).  I also refer to the comments from Dr. Annelise Gill-Wiehl for a comprehensive technical assessment of the proposed methodology.  Many thanks to the methodology development team for all of the work that went into preparing this methodology. |  |
| 844 | Leakage | te | Leakage: according to an analysis we performed, which will go through a peer review process and which we shared with CCA, a 5% leakage rate is conservative and likely would lead to a small amount of under-crediting.  Until our article goes through peer review, we believe it can be best used to defend the conservativeness of a 5% leakage rate.  Further, our study analyzed published randomized control trial (RCT) data informing leakage rates in rural areas; but we did not find RCT data for urban areas. | Option 1 should read:  “apply a default leakage rate of 5% to the emission reductions to approximate leakage emissions; this value may be updated with peer reviewed journal publication documenting higher or lower leakage rates across many regions, in rural and urban areas, or” |
| 1154 | Transparency | te | Please require the calculation sheet always be made publicly available. | The calculation sheet should always be publicly available (not optional). |
| 1210 | CCA Principles | te | I suggest adding one more bullet in the CCA Principles for Responsible Carbon Finance in Clean Cooking (could go under Fairness or Sustainability) >> | Carbon finance should prioritize clean stoves and sustainable fuel supply chains aligned with World Health Organization (WHO) recommendations wherever reasonably possible. |
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|  |  |  | **This methodology also has a number of positive advances over current methodologies. Below I list some of the innovations that align this new methodology with the latest science.** |  |
| 973 | Hawthorne Effect | te | Hawthorne effect: the inclusion of a Hawthorne effect discount factor is an important improvement from previous methodology.  The Hawthorne effect is well-recognized in the literature whereby households use the project stove more when being observed by someone associated with the cookstoves company.  I understand that only one peer-reviewed study – Simons et al (2017) – has been published to date quantifying the effect and finding that a 35% discount rate on the number of credits issued is needed to avoid over-crediting (calculated from their findings of a 53% increase in cooking with the project stove during a KPT).  CLEAR proposes using a 25% discount based on this study and on a new non-peer-reviewed study that uses less rigorous methods for examining the Hawthorne effect compared to Simons et al and finds a low Hawthorne effect.  A 25% discount factor for the Hawthorne effect seems reasonable given the limited data available. | None. |
| 1085 | fNRB | ed | On fNRB, I strongly support the use of MoFuSS to calculate fNRB; it is the best science to date. I also strongly support retiring CDM TOOL30. | None. |
| 1129 | Project Information Cover Sheet | ed | A Project Information Cover Sheet should help to increase transparency for cookstove offset projects. Thank you for including one. | None. |
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|  | NOTE: | ge | Please refer to our cookstoves offsets website for more details on the literature backing the comments above: <https://gspp.berkeley.edu/berkeley-carbon-trading-project/cookstoves> |  |
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*(Please add rows as required)*

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**Document information**

| *Version* | *Date* | *Description* |
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| 1. 01.0 | 1. 23 May 2025 | 1. Initial publication of form template. |
| 1. Decision Class: Regulatory Document Type: Form Business Function: Methodology Keywords: A6.4 mechanism, developing methodologies and tools, stakeholder consultation | | |