GLOBAL STAKEHOLDER CONSULTATION FORM FOR PROPOSED NEW BASELINE AND MONITORING METHODOLOGY OR METHODOLOGICAL TOOL (version 01.0)

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Reference number of proposed new methodology or methodological tool	A.64-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	03 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)
1.	**Section B.2 Para 3 (Applicability condition 1)**	**GE**	The requirement that all project cookstoves have a unique identifier is appreciated; however, clarification is needed on how identifiers will be managed when stoves are replaced or upgraded during the crediting period.	Include a standardized protocol or registry mechanism for handling ID continuity in the event of stove failure or household changes.
2.	**Section B.2 Para 3 (Applicability condition 3)**	**TE**	Thermal efficiency thresholds for griddle-based, charcoal, and other biomass stoves are clearly stated. However, thresholds for electric, biogas, LPG and ethanol stoves (used in fuel-switching) are not included.	Include minimum performance thresholds for clean fuel technologies where applicable, or state why they are excluded.
3.	**Section B.2 Para 4 (Caveats and restrictions point 3)**	**TE**	Limiting biogas project applicability to only CTEC approach could exclude viable projects using alternative monitoring methods at remote areas.	Consider allowing non-CTEC biogas projects that meet equivalent monitoring rigor and demonstrate robust usage data through validated protocols.
4.	**Section B.5.5.3, B.5.5.3.1 (Equation 14)**	**TE**	The approach and equation for $UEbase,i,y$ calculated for non-CTEC projects under the baseline scenario is not mentioned.	Include the approach and equation for $UEbase,i,y$ calculated for non-CTEC projects under the baseline scenario.
5.	**Section B.6, B.6.1 (Equation 17)**	**TE**	The approach and equation for U$Eproj,j,y$ calculated for non-CTEC projects under the project scenario is not mentioned.	Include the approach and equation for U$Eproj,j,y$ calculated for non-CTEC projects under the project scenario.
6.	**Section B.2 Para 4 (Caveats and restrictions point 4)**	**GE**	The methodology mentions the need for safeguards to prevent fuel diversion for non-project activities but does not specify what these look like.	Include examples of acceptable safeguards (e.g., sealed canisters, tamper-evident meters, or delivery log cross-verification etc.) for audit purposes**.**
7.	**Section B.2 Para 2**	**GE**	The methodology states that “There is no restriction on the number of households involved or the total emission reductions achieved”. Hence, is it applicable for micro-scale initiatives as well? Non-CTEC must implement SUMs and KPTs, which may be challenging for micro-scale initiatives. Can pre-approved default factors or simplified methods for micro-scale projects be identified and used?	Include any pre-approved default factors or simplified methods for micro-scale projects.

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8.	**Section B.5.4.1 Point 3**	**GE**	The methodology states that "During the first usage survey, project households are asked **retrospective questions** to assess alignment with the originally defined baseline scenario. If material discrepancies are found— defined as more than a 10% difference in fuel mix or household size— conservative adjustments are required, either by not claiming emissions reductions from non-conforming households or adjusting baseline estimates downward (see section below for specific quantitative guidance)". It is unclear what specific retrospective questions should be asked during the first usage surveys.	Sample Survey guidelines with retrospective questions could be included in the methodology for clarity.
9.	**Section B.10.5**	**GE**	The methodology states that "KPTs must be undertaken every two years, at the end of the monitoring period for which credits are being validated and issued, rather than at the beginning of a monitoring period". The rating agencies suggest doing it annually rather than biennially. Further, for micro-scale projects, doing KPT every 2 years can lead to financial and resource constraints.	The following frequency can be followed for different scales of the project: 1. Large-scale: Annually 2. Small- scale: Biennially 3. Micro-scale: Flexibility in KPT frequency for micro-scale projects, such as extending the interval or allowing KPTs only if significant changes in cookstove models or fuel mix are observed.
10.	**Section B.9 (Step 5)**	**GE**	The methodology states that "If the project technology shows a market penetration, meaning the percent of households in the target population with a functional technology that is equivalent to the project technology, greater than 30%, then it is considered common practice and is not additional." No guidance is provided on acceptable sources (survey, studies, reports) for assessing market penetration rate. Further, excluding projects which cross the 30% threshold won't be reasonable and would discourage adoption of good quality projects and where cookstoves are really needed.	Guidance could be provided on acceptable sources (survey, studies, reports) for assessing market penetration rate. Further, projects can be made to prove additionality through investment analysis etc. if they cross the threshold of 30%.

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11.	**Section A.3 (FNRB)**	**TE**	The methodology states that "If UNFCCC determines that a marginal approach to calculating fNRB is allowable, MoFuSS may be used to calculate marginal fNRB for a given project under the CLEAR methodology." It remains unclear what specific research is required to fully understand the implications of a marginal fNRB. Currently, the MoFuSS model evaluates non-renewability based on the total harvest across a landscape. However, there is a growing suggestion that fNRB should instead be assessed in terms of the non-renewability associated with a marginal reduction in harvest.	We recommend that the UNFCCC assesses the marginal approach to fNRB.

(Please add rows as required)

Document information

Version	*Date*	*Description*
01.0	23 May 2025	Initial publication of form template.

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