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

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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	

#	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)
	A.3	**Te**	In Section A.3, Fraction of Non-Renewable Biomass (fNRB), the third option states that "where applicable, project proponents may run the MoFuSS model using their own rigorously validated inputs." However, it is unclear what qualifies as "rigorously validated inputs." Providing clear guidance and examples would help project developers understand which inputs are acceptable and how to ensure they meet validation requirements.	Below proposed examples of what can be considered rigorously validated inputs: • Input based on information from surveys where the 95/10 rule is met. • Appropriate national or regional datasets or published literature.
	B.4	**Te**	The definition for crediting period (CP) does not clearly state the number of crediting period "…..*This methodology allows a maximum crediting period duration of 5 years, with opportunity for crediting period renewal*." Could you please specify the number of CP renewals allowed under this methodology? Consider the requirements already set in other carbon certification entities for the same activity.	In case this is considered a methodology requirement, it should be clearly state the number of crediting period renewals allowed. If not, as mentioned in several sections of the methodology. The number of crediting period renewal is an activity requirement, not a methodological consideration.
	B.5.5.1	**Te**	In sub-section 1. Data collection and downward adjustments is stated: "*Additionally, CTEC projects must reassess project cookstove efficiency* ***at least twice during the crediting period****, using representative devices from the aging fleet, which captures performance degradation over time and further lowers estimated displaced baseline energy*". Despite the statement offer the chance to project develop to choose when to reassess the project cookstove efficiency. To avoid doing in the last two years of a crediting period, it should consider the same wording at section 5.4.2 "*For CTEC projects that back-calculate their baseline, the proportion of cooking on baseline technologies is assessed periodically (at least every other year) during the project*".	Instead of "*at least twice during the crediting period*" use an statement already mentioned in the methodology "*at least every other year*": project year 1, project year 3 and project year 5.
	B.5.5.2	**Te**	To address seasonal variation, the methodology proposes questions such as: "Relative to the amount of fuel you	This raises the following points for clarification:

			used this week, are there other times of the year when you use more fuel? If so, when? And/or less fuel? If so, when?" However, it does not specify how seasonal variation should be factored into energy consumption estimates for both baseline and project scenarios. In light to address seasonal variation some questions are proposed: "Relative to the amount of fuel you used this week, are there other times of the year when you use more fuel? If so, when? And/or less fuel? If so, when?", but there is not set details about how this variation will apply in energy consumption for baseline and project scenarios.	• The methodology should include a question about the extent of seasonal variation (e.g., percentage or amount of fuel increase/decrease), so that energy consumption can be adjusted accordingly. • If qualitative surveys are not permitted—or are insufficient—for making this adjustment (in both CTEC and non-CTEC projects), then Kitchen Performance Tests (KPTs) should be conducted across different seasons.
	B.5.5.5	**Te**	Annual downward adjustments: There are two sources to address the risk of over-crediting due "(1) to the over-estimation of use of the project technology (25% downward adjustment to the total number of PTDs which can be reduced to 10% by providing certain customer support actions)" and "(2) to the Hawthorne effect, non-CTEC projects shall apply a 25% downward adjustment to their emission reductions (ERs) unless they opt to measure any effects directly with SUMs, comparing stove use during the KPT to the month before or after, and adjusting downward accordingly". If a non-CTEC project only conduct certain customer support actions which the most possible situation in several cookstove projects, the ERs will be discounted by (1-10%)*(1-25%), an overall deduction of 32.5% will be applied which could hinder the implementation of a project.	We acknowledge that validating stove usage with SUMs enhances the reliability of project outcomes. However, given the additional costs they introduce, we recommend that the discount be reduced or applied in proportion to the annual volume of emission reductions (ERs) calculated. Additionally, we request disclosure of the sources and data used to justify the 25% downward adjustment attributed to the Hawthorne effect.
	A.3	**Te**	The next comment is based on Victor Costenoble submission, we strongly support the concept. As noted in Section A.3: "*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*." Currently, a fixed fNRB value from MoFuSS is applied only	Based on Victor Costenoble's proposal, it is suggested the next approach: • **Dynamic fNRB:** Use ex-post fNRB from MoFuSS with updated project-specific inputs. • **Expanded boundary:** Include both project and non-project households in

			to households receiving improved cookstoves. However, the fNRB value derived from the MoFuSS reflects the entire area's household population, including non-project households—implicitly extending the system boundary. To better align with this broader scope, and in line with a marginal approach, it is proposed considering two key effects: (1) reduced NRB use by non-project households due to increased renewable biomass availability, and (2) the marginal change in fNRB between baseline and project scenarios. This would enable recognition and crediting of indirect, landscape-level emission reductions as modeled by MoFuSS. As mentioned in section A.3 *"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."* The current approach uses a fixed fNRB from MoFuSS, applied only to households receiving improved cookstoves. However, this fNRB concept value reflects the entire area's households, including non-project ones—implicitly expanding the system boundary. To better align with this and following a marginal approach, it is proposed accounting for reduced NRB use by non-project households, driven by increased renewable biomass availability and also the marginal impact on fNRB between baseline and project scenario. This would allow crediting of indirect, landscape-scale emission reductions modeled by MoFuSS.	emissions, matching the original MoFuSS baseline coverage. The revised emissions reduction (ER) equation becomes[1]: $ER = (n_p \times \Delta B \times f_{NRB,b} + \Delta f_{NRB} \times (n_b \times B_b + n_p \times B_p)) \times EF$ Where: • $\Delta B = B_b - B_p$: fuel savings per project household • $\Delta f_{NRB} = f_{NRB,b} - f_{NRB,p}$: change in fNRB between baseline and project scenarios • n_p: number of project households • n_b: number of non-project households • EF : emission factor (simplified version, neglecting a.o. distinction between CO_2 and non-CO_2 emissions) This approach highlights an important, yet currently unrecognized, benefit of improved cookstove projects—a reduction in regional pressure on non-renewable biomass (NRB), reflected in decreasing fNRB values over time. Variations in fNRB (ΔfNRB) result in tangible and quantifiable emission reductions, even for households not directly participating in the project. Accounting for this effect would lead to more accurate and consistent emission reduction estimates, in line with the MoFuSS modeling framework already integrated into the methodology.

[1] The complete demonstration is found in the submission from Victor Costenoble.

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Document information

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