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	

Issue	Current proposal in CLEAR	Recommended change	Comment
Wood-to-charcoal conversion	Single default 6 : 1 conversion (with optional 4 : 1 for CCP)	Allow usage of region-specific factors; require justification via national forestry or FAO data.	Allowing regional values provides more flexibility to those that have the data to demonstrate
Fraction of non-renewable biomass (fNRB	Only MoFuSS defaults or bespoke MoFuSS runs; CDM TOOL30 disallowed	Permit triangulation with field wood-fuel surveys or TOOL33, where national inventories exist; require sensitivity test vs. MoFuSS.	Several African governments (e.g. Rwanda, Ghana) maintain up-to-date biomass-supply datasets; Dual pathway avoids over- or under-crediting.
B.5.5.3 “Baseline caps & flags	Cap 0.031 TJ u.e./pp-yr & flag >0.016 for wood users	Contextual cap: raise to 0.040 TJ u.e./pp-yr in Sahel & high-altitude zones (longer cooking times) when supported by KPT evidence.	West-African dishes (e.g. tô, fufu) need prolonged simmering; existing Gold Standard projects often exceed 0.031 TJ without over-crediting.
B.5.5.3 Global default baseline	Default 0.0012 TJ u.e./pp-yr wood (0.5 t)	Offer regional default tiers (for e.g., 0.7 t yr^{-1} humid tropics; 0.4 t yr^{-1} arid).	This is needed to align with the three African climatic bands; reduces survey cost for small proponents.
PTD caps (90 % / 75 %)	Non-CTEC projects limited to 90 % (with support) or 75 % of max PTDs	Introduce a “digital-verification” tier (95 %) where low-cost sensors or pay-as-you-cook smart chips confirm daily functionality.	African PAYG LPG and metered pellet businesses (e.g. KOKO, Inyenyeri) already collect these data; rewarding them mirrors Verra’s remote-monitoring allowances.
Step 5: Common-practice screen > 30 %	Project ineligible if ≥ 30 % of households already own equivalent stove	Remove this requirement. Also, allow “suppressed-demand” justification where income or fuel price prevents use.	Our recent study on subsidizing the clean cooking transition has shown that there is no automatic market uptake and sustainability of clean cooking until considerable GDP per capita and income levels of households are reached. Removing this requirement also avoids penalizing urban African markets where LPG penetration quickly rises.
Leakage default 2%	Apply flat 2 % deduction or project-specific analysis	Suggest including the country-/fuel-specific default table depending on the documentation of the supply-chain displacement unless project quantifies leakage directly.	Emerging practices and availability of needed data helps to identify appropriate values, sometimes lead to higher defaults, where supply-chain displacement is documented.

Issue	Current proposal in CLEAR	Recommended change	Comment
Hawthorne effect cap 75 % of ERs	Non-CTEC projects may cap ERs at 75 % or deploy SUMs	Clarify that SUMs include low-cost continuous-temperature and allow statistically-modelled adjustment, not full metering.	Removes ambiguity
MoFuSS determined once ex-ante	fNRB fixed for crediting period	Require update at each renewal or when national biomass-stock study > 5 years newer.	African wood-fuel landscapes change rapidly (e.g. Mozambique 2016-2024 deforestation spike); Gold Standard requires fNRB refresh at every renewal.
Baseline electricity emission factor	Uses IFI marginal grid EF list (Appendix 2)	Allow national regulators or IEA hourly marginal EF where published, and mini-grid measured EF for isolated systems.	Reflects rapidly greening grids (Kenya geothermal, South Africa REIPPPP); ensures baseline isn't inflated.
Data parameter "Scales accuracy"	10 g or 2 % resolution; daily 1 % calibration	Add photo-log + mobile-app verification option (timestamp & geotag) for remote African field teams; weekly calibration acceptable if using app-verified reference weights.	Reduces field burden & fraud risk
Glossary "Stove Use Monitor"	SUMs "do not measure fuel consumption" and thus not CTEC-compliant	Clarify that SUMs may be paired with modelled fuel-use algorithms (e.g. time-at-temperature vs. KPT correlations) to upgrade to "quasi-CTEC" pathway.	Enables African PAYG LPG / smart-meter projects to earn CTEC precision without expensive flow-meters
KPT frequency	Once every 2 yrs	Allow the option to switch to meter-based fuel measurement	Balances cost vs. data quality; allows innovation
Baseline fuel consumption data	3-day Kitchen Performance Test (KPT) sample of 30 households	Require ≥7-day KPT with min. 100 hh per stratum; supplement with FAO/WHO wood fuel studies where survey impractical	Longer monitoring reduces day-to-day variance
Additionality	Most follows the additionality tool	Allow suppressed demand justification as well, mainly along with the barrier analysis	Captures non-financial adoption barriers (gender, liquidity)
Sample size and precision	90 / ±15	90 / ±10 for emission reduction parameters; 95 / ±10 where results >1 $MtCO_2e$	Meets ICVCM high-integrity thresholds
Attrition tracking	Assume 10 % stove loss	Require actual inventory verification each verification; retire serial numbers	Prevents double issuance; ISO 14064-2:2019 best practice

Additional comment: *The document highlights that emission reductions from clean cooking projects, as modeled by MoFuSS, are physically linked to increased biomass stock in the landscape. MoFuSS is a spatially explicit model that identifies probable biomass supply areas and calculates fNRB based on actual landscape-level biomass changes. Contrary to current text in Section B11, the emission reductions, as mentioned elsewhere in the document, are indeed tied to physical carbon stocks, meaning landscape disturbances (e.g., fires) can negate these gains. However, such events are typically treated as part of the baseline scenario, not the project's responsibility. Thus, wording on reversals and monitoring may need to be revised to reflect MoFuSS's spatial approach and the fact that ERs are derived from avoided biomass extraction, resulting in a real stock increase.*

Document information

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

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