



STAKEHOLDER COMMUNICATION FORM (Version 01.0)

This form shall be used for any Article 6.4- related communication with the Article 6.4 Supervisory Body or UNFCCC secretariat. All the sections are mandatory unless otherwise indicated.

The completed form and any supplemental documents shall be submitted electronically to A6.4mechanism-info@unfccc.int.

1 SECTION 1: COMMUNICATION HEADER

Title	Co-Vice-Chair
First Name / Last Name:	Olivia / Tuchten
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Stakeholder Type:	<input checked="" type="checkbox"/> Activity participant <input type="checkbox"/> Applicant Entity (AE)/Designated Operational Entity (DOE) <input type="checkbox"/> Consultant <input type="checkbox"/> Designated National Authority (DNA) <input type="checkbox"/> Focal point entity of activity participant <input type="checkbox"/> General Public <input type="checkbox"/> Media <input type="checkbox"/> National Focal Point <input checked="" type="checkbox"/> Non-Governmental Organizations <input type="checkbox"/> Researcher <input type="checkbox"/> Other If other, please specify:
This communication is addressed to¹:	<input type="checkbox"/> The secretariat <input checked="" type="checkbox"/> Chair of the Supervisory Body

2 SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (POA)

If this communication refers to a specific Article 6.4 project activity/PoA, please answer the questions in this section (Otherwise proceed to Section 3)

Project/PoA Ref Number:	If applicable, Component Project Ref. Number:
Project/PoA Title:	n/a
Activity Cycles Stage:	<input type="checkbox"/> Prior consideration <input type="checkbox"/> Validation <input type="checkbox"/> Approval <input type="checkbox"/> Registration <input type="checkbox"/> Post-Registration <input type="checkbox"/> Verification <input type="checkbox"/> Authorization <input type="checkbox"/> Issuance <input type="checkbox"/> Renewal <input type="checkbox"/> Other If other, please specify:

If there is no specific Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).

¹ In accordance with the “Procedure: Direct communication with stakeholders” (version 02.0), stakeholder may address communications either (a) to the secretariat, in order to seek a fast-track technical or operational explanation regarding the implementation of existing Article 6.4 rules, or (b) to the Article 6.4 Supervisory Body, in order to communicate to the Body their views on Article 6.4 rules and their implementation or to seek official clarification of Article 6.4 rules.

Host Country(ies):	n/a
3 SECTION 3: YOUR COMMUNICATION	
Title/Subject <i>Maximum 250 characters</i>	Clean cooking activities and non-permanence related matters.
<p>Communication Text Include background, details, and conclusion</p>	<p>According to the FAO, more than 2 billion people in the world still depend on woody biomass as a source of primary energy. Market based mechanisms provide one of the most tangible approaches to allow for the large-scale expansion of cleaner cooking practices, reconciling mitigation and positive sustainable development impacts for rural and urban communities, which are subject to high levels of social, economic and environmental vulnerabilities.</p> <p>As part of the implementation of PACM, we have been deeply engaged in the process of methodological updates intended to enhance integrity and enable the transition from the CDM to a new set of practices under Article 6.4 of the Paris Agreement. In this context, we are closely following the development of clean cooking methodologies under PACM, including publicly available information on PMM0004 (henceforth the CLEAR methodology).</p> <p>Statement of concern and request</p> <p>We note with concern that the issue of non-permanence is being considered in relation to clean cooking activities - including through its mention as an example in footnote 14 of the PACM Reversals Standard² - and is being considered on a priority basis under the Methodology Expert Panel (MEP) towards development of the “Reversal risk assessment” tool for cookstove methodologies under development.³</p> <p>We respectfully submit to the Supervisory Body that non-permanence related provisions should not be applied to cleaner cooking activities.</p> <p>Accordingly, we request the Supervisory Body to take into account the evidence and conclusions reached in relevant discussions in other forums, and to clarify that clean cooking project types do not give rise to non-permanence or reversal risks, and therefore should not be subject to reversal-related provisions under PACM.</p>

² SBM 018-A13 - Standard: Addressing non-permanence and reversals in mechanism methodologies (v.01.0).

³ Para 11 and Para 18 of the Report of the 11th Meeting of the Methodology Expert Panel, accessed here: <https://unfccc.int/sites/default/files/resource/A6.4-MEP011.pdf>

	<p>Rationale and supporting evidence</p> <p>The applicability of non-permanence provisions to clean cooking activities has been extensively debated over many years within the clean cooking community and among standard setters. The prevailing understanding is that the potential climate benefits associated with cleaner cooking, especially the mitigation of CO₂ from the reduced consumption of non-renewable biomass, do not require provisions on reversals, as there are no claims for removals. Rather, they require provisions to ensure that emission reductions are attributable to the avoided combustion of non-renewable biomass. To address this; clean cooking methodologies, including CLEAR⁴, rely on the fraction of non-renewable biomass (fNRB), as per the recently revised and approved version of Tool 33.</p> <p>As explained in Tool 33, fNRB has been developed to address the risk that the biomass subject to combustion in cleaner cooking activities may come from wood stocks that regenerate at a rate that would make such consumption renewable. In this case, the CO₂ emissions would be carbon neutral and no CO₂ emission reductions would occur (although CH₄ and N₂O would still take place). Therefore, once a project activity applies the fNRB factor and its related methodological provisions, it ensures that emission reductions are credited only for the fraction of biomass consumption that would have resulted in net CO₂ emissions.</p> <p>For clarity, while reduced fuel use may incidentally reduce pressure on biomass resources, clean cooking activities do not claim credits or rely on the preservation of forest carbon stocks as a mitigation outcome. Emission reductions are realised through avoided fuel combustion, and subsequent loss of biomass or forest carbon cannot constitute a reversal of claimed reductions.</p> <p>Discussions in other forums, including the Integrity Council for the Voluntary Carbon Market (ICVCM), have reached similar conclusions in the context of clean cooking. For example:</p> <p><i>“The assessment process considered numerous viewpoints on this issue and noted that methodologies may not directly measure and address reversal risks because emission reductions are derived from energy displaced or saved, rather than from maintaining biomass stocks (ICVCM, 2025:5⁵)”.</i></p>
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⁴ For details on the non-permanence related conclusions within the CLEAR framework please check <https://cleancooking.org/wp-content/uploads/2025/06/CLEAR-revised-EOD-June-2025.pdf> (pages 15 to 17).

⁵ https://icvcm.org/wp-content/uploads/2025/03/Board-Observations_Cookstoves-and-Biodigesters-FINAL.pdf

	<p>In short, clean cooking projects avoid emissions at the point of fuel use, which is why non-permanence considerations are not applicable.</p> <p>On this basis, we respectfully submit that clean cooking project types should not be subject to provisions addressing non-permanence risks, given (i) the nature of the mitigation outcome involved, and (ii) the existence of recently updated and conservative provisions on the adoption of fNRB, which are already part of the CLEAR methodology (PMM0004).</p> <p>We remain available for any clarifications on this matter. Thank you once again for the opportunity of expressing our concerns and we look forward to hearing from you.</p> <p>Sincerely yours, The Project Developer Forum</p> <p>About us The Project Developer Forum (PD Forum) was founded in 2009 and brings together leading practitioners in the development and financing of greenhouse gas (GHG) emission reduction and removal projects to strengthen the standards and mechanisms of international carbon markets, from the Paris Agreement and CORSIA to national, corporate and voluntary programmes, ensuring they are robust, efficient, and drive real climate progress. We seek to improve the efficiency, legitimacy and functioning of the regulatory systems governing the development and use of emission reduction projects. We currently represent more than 60 different organizations.</p> <p>The PDF and its member companies have been working intensively on mitigation solutions based on cleaner cooking practices.</p>
<p>Supplemental Documents <i>If applicable, list the title(s) of any attached file(s) or link(s)</i></p>	<p>³ For details on the non-permanence related conclusions within the CLEAR framework please check https://cleancooking.org/wp-content/uploads/2025/06/CLEAR-revised-EOD-June-2025.pdf (pages 15 to 17).</p> <p>⁴https://icvcm.org/wp-content/uploads/2025/03/Board-Observations_Cookstoves-and-Biodigesters-FINAL.pdf</p> <p>https://goldstandard.cdn.prismic.io/goldstandard/aUkQFHNYCif9oj_b_TPDDTECPAAV5.0-PC.pdf</p>

This communication may be made public	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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