



## 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](mailto:A6.4mechanism-info@unfccc.int).*

### SECTION 1: COMMUNICATION HEADER

<b>Title</b>	
<b>First Name / Last Name:</b>	Elisa / Derby
<b>Name of Organization:</b>	Clean Cooking and Climate Consortium (4C)
<b>Country</b>	USA
<b>E-mail address:</b>	<a href="mailto:climate@cleancooking.org">climate@cleancooking.org</a> / <a href="mailto:ederby@cleancooking.org">ederby@cleancooking.org</a>
<b>Phone number (Including country code):</b>	
<b>Stakeholder Type:</b>	<input 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:
<b>This communication is addressed to<sup>1</sup>:</b>	<input type="checkbox"/> The secretariat <input checked="" type="checkbox"/> Chair of the Supervisory Body

### 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)*

<b>Project/PoA Ref Number:</b>	If applicable, Component Project Ref. Number:
<b>Project/PoA Title:</b>	
<b>Activity Cycles Stage:</b>	<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).*

<sup>1</sup> 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.

<b>Host Country(ies):</b>	
<b>SECTION 3: YOUR COMMUNICATION</b>	
<b>Title/Subject</b> <i>Maximum 250 characters</i>	Non-permanence and reversal risks for clean cooking
<p><b>Communication Text</b>  <i>Include background, details, and conclusion</i></p>	<p>Dear Members of the Supervisory Body,</p> <p>The Article 6.4 mechanism is at a critical juncture in its operationalisation. As the global community looks to this Body to establish a premier benchmark for high-integrity carbon finance, the success of this mission depends on providing timely pathways for high-impact sectors.</p> <p>We are concerned that continued delays in methodological approval risk creating a permanent break in project continuity, particularly as the window for a seamless transition from the CDM is rapidly closing. Without quick action, many essential projects will be left in a regulatory vacuum that undermines the credibility of the centralized mechanism.</p> <p>Clean cooking is a cornerstone of climate justice and an important pillar of national climate strategies, especially across sub-Saharan Africa. Given how much of the region still relies on traditional biomass, these projects are often an important and viable way for African Parties to engage with international carbon markets. Yet, as recently highlighted during the UN International Day of Clean Energy on January 26, the world remains alarmingly off-track to meet SDG 7 targets, leading the Secretary General to call on the global community to lift barriers and cuts costs with scale, speed, and solidarity. For the many countries that have prioritized these projects in their Article 6 strategies, the current methodological void acts as a profound barrier to meaningful participation in the Paris Agreement.</p> <p>The CLEAR methodology (A6.4-PNM004) offers a high-integrity solution that is ready for implementation. By combining conservative defaults, guardrails aligned with the latest science, including the use of MoFuSS to determine realistic fNRB values, and mandated direct in-home fuel consumption measurements, it addresses core concerns regarding over-crediting. Adopting this methodology in the near term would provide a clear signal that the mechanism is open for business and capable of delivering verifiable mitigation outcomes.</p> <p>We urge therefore the SBM to prioritize operational progress over new, experimental requirements previously unseen in the clean cooking sector. A primary example is the resurfacing debate regarding non-permanence and reversal risks for emission</p>

	<p>reductions activities. Newly suggested alternatives on how to assess the non-permanence and reversal risks lack a unified scientific consensus, and practical tools are not sufficiently mature to be implemented without causing unacceptable delay and jeopardizing the systemic project viability for decentralized energy projects. Imposing new theoretical frameworks now, without a proven, workable, and broadly accepted scientific approach, would contradict the SBM’s own mandate to minimize transaction costs and ensure a stable and predictable investment climate. Such a fundamental regulatory misalignment risks stalling the transition process and undermines the usability of the mechanism, effectively barring participation from host Parties that Article 6.4 mechanism was designed to support.</p> <p>We propose that the SBM accelerate the approval of the CLEAR methodology to provide the market with the certainty required for the CDM transition. If the science for addressing non-permanence in energy-demand sectors evolves, the methodology can be updated as part of a scheduled review. To do otherwise is to prioritize a theoretical debate over immediate climate action.</p> <p>Respectfully,</p> <p>The Clean Cooking and Climate Consortium (4C)</p>
<p><b>Supplemental Documents</b> <i>If applicable, list the title(s) of any attached file(s) or link(s)</i></p>	
<p><b>This communication may be made public</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

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**Document information**

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	28 October 2025	Initial publication of form template.
<p>Decision Class: Regulatory                      Document Type: Form                      Business Function: Governance                      Keywords: A6.4 mechanism, communications, stakeholder consultation, transparency</p>		