

**Agenda item 3.3.**

Paragraph 9 of the annotated agenda

**Revision of AMS-II.G.: Energy efficiency measures in thermal applications of non-renewable biomass**

**Methodological Expert Panel – 14<sup>th</sup> meeting**

22 to 26 June 2026

Bonn, Germany



- MEP workplan for 2025 (issued at SBM015) contained further work on revision of CDM methodologies/tools, and a list of CDM methodologies and methodological tools prioritized for transitioning to the Article 6.4 mechanism, including the methodologies:
  - AMS-II.G.: Energy efficiency measures in thermal applications of non-renewable biomass;
  - AMS-I.E: Switch from non-renewable biomass for thermal applications by the user.
- Study conducted on permanence of emissions reductions from improved cookstove projects on behalf of MEP.
- Adoption by CDM EB125 of a revision to Tool 33 (use of  $f_{NRB}$  values from the MoFuSS approach).
- Adoption by SBM018 of the standard “Addressing non-permanence and reversals in mechanism methodologies” (cf. para. 6 and para. 11 to 17).



- MEP 011 considered the revision of “AMS-II.G.: Energy efficiency measures in thermal applications of non-renewable biomass” and “AMS-I.E.: Switch from non-renewable biomass for thermal applications by the user”, together with the proposed mechanism methodology (PMM) “PMM004: Comprehensive Lowered Emission Assessment and Reporting (CLEAR) Methodology for Cooking Energy Transitions” and agreed to continue work.
- MEP 012 further considered the revision of “AMS-II.G.: Energy efficiency measures in thermal applications of non-renewable biomass” and “AMS-I.E.: Switch from non-renewable biomass for thermal applications by the user” and agreed to continue to work on these methodologies.



- MEP 013 considered the revision of “AMS-II.G.: Energy efficiency measures in thermal applications of non-renewable biomass” and agreed to seek input from stakeholders on the “Draft mechanism methodology: Energy efficiency measures in household cooking”.



## Key issues and proposed solutions: Overview

- Call for public inputs: 24 April - 15 May 2026.
- 20 submissions received from the call for public inputs (total of 321 inputs).
- One confidential stakeholder communication to the SBM on this methodology received.

| SCOPE                            | NUMBER OF INPUTS |
|----------------------------------|------------------|
| Conservativeness and uncertainty | 121              |
| Applicability conditions         | 43               |
| Definitions                      | 5                |
| Additionality                    | 13               |
| Baseline                         | 90               |
| Downwards adjustment             | 14               |
| Activity scenario                | 29               |

| SCOPE                              | NUMBER OF INPUTS |
|------------------------------------|------------------|
| Non-permanence risk                | 46               |
| Wood to charcoal conversion factor | 10               |
| Equations                          | 12               |
| Appendices                         | 88               |
|                                    |                  |
|                                    |                  |
|                                    |                  |

Note: one comment may fall into several of the above-listed scopes



### Conservativeness and uncertainty:

- Major issue: compounding conservativeness to address uncertainty (seen as too conservative) which add to other deductions: (i) Ambitious benchmark; (ii) Conservative BAU comparison; (iii)  $\Psi_y$  percent of households that qualify as users; (iv) Hawthorne adjustment; (v) 1%/yr downward adjustment; (vi) Buffer pool contribution; (vii) fNRB; (viii) OMGE and SOP deduction:
  - Proposal to apply “substitution rule” when considering the conservativeness of various values;
- Exclude values which are already conservative (or overridden by more conservative values) from the uncertainty analysis;
- Deduction for Hawthorne effect: seen either as too high or too low;
- The comparison with the conservative BAU sets a too conservative cap de-facto;
- Useful energy for cooking of 0.001095 TJ/person/yr ( $\approx 3$  MJ/day) is too conservative and not representative of reality:
  - Differentiate regionally or allow activity-specific values;
- Allow the use of more measured values rather than default values;
- Select [90%] confidence value.



### Definitions:

- Artisanal cookstove: Improve / further elaborate the definition;
- User household: Revise the definition (which includes the usage rate).

### Applicability conditions:

- Need for enhanced clarity on the +/- 20% allowed change in types of fuel use between pre-activity and activity scenario;
- Request to make the methodology applicable in institutional contexts;
- Request to also consider situation with an auxiliary use of stoves for space heating;
- Request for enhanced clarity and flexibility on poverty demonstration;
- Consider other options than ISO 19867-1:2018 for thermal efficiency testing (future revisions thereof, equivalent national standards);
- Strengthen the unique cookstove identification requirement.



### Additionality:

- Regulatory analysis: do not exclude activities receiving subsidies if the subsidy level is insufficient;
- Amend or remove the 4.5% improved cookstove threshold for applicability;
- Amend the proposed approach to additionality or offer alternatives (e.g. barrier analysis);
- Clarify how the cookstove efficiency thresholds (16.6% for wood; 23.6% for charcoal) were derived.



### Baseline:

- Mixed views on option 1 (conservative default ambitious benchmark) and 2 (activity-specific ambitious benchmark):
  - Leave activity participant free to choose between option 1 and 2 without restriction;
  - Reject option 1 or option 2;
  - Make option 2 the default (but with guardrails: e.g. cannot exceed option 1 benchmark by >15%);
  - Allow option 2 to use data from the pre-activity survey or KPT;
  - Propose more/other options (e.g. historical emissions).
- Cross-check of pre-activity survey (with recent appropriate information): enhance clarity on this cross check and favor the selection of the most relevant/appropriate source over conservativeness;
- Exclude activities registered under other carbon mechanism schemes from the analysis under section 7.1.1 (Assessment of the presence of cooking technologies equivalent to the project cookstoves);
- Rename “pre-activity scenario” to “pre-activity situation”;
- Consider fuel stacking.



Non-permanence risk: Many comments received requesting to exempt all generated A6.4ERs from a contribution to the Reversal Risk Buffer Pool Account. Most common arguments include:

- The already high conservativeness of the methodology;
- Alignment with other cookstove methodologies (e.g. from voluntary carbon standards);
- Cookstove activities do not generate stored carbon (only flow of “avoided” carbon emissions) and do not pertain to carbon stocks;
- Cookstove activities generate immediate irreversible carbon emissions;
- Concept of fNRB may already address the risk related to carbon stored in the landscape.



### Equations

- Corrections to avoid double summation;
- Clarification when equation are for the sum of all households (e.g.:  $\sum_h Days_{y,h}$ ).

### Appendices:

- Clarify and further elaborate the “waiver certificate”;
- Require stricter sample size for the use of SUMs (e.g. 2000 SUMs or at least 5% of all stoves);
- Algorithms to treat SUM raw data to be made public.



### Downward adjustment

- Request to exempt the methodology from downward adjustment in subsequent years – on the basis of limited economic viability (in alignment with para. 66 of the “Standard: Setting the baseline in mechanism methodologies”) and negligible observed autonomous adoption of improved cookstoves.

### Wood to charcoal conversion factor

- Originally proposed 4:1 ratio is overly conservative and not representative of artisanal charcoal production;
- Suggestion to revise to a higher factor to better align with realities on the ground (e.g. 6:1, 5:1).



- Recommend the mechanism methodology for adoption by the SBM.

