

August 16, 2023

Article 6.4 Supervisory Body

United Nations Framework Convention on Climate Change
Bonn, Germany

RE: Clean Cooking and Climate Consortium (4C) submission in response to the “Call for input 2023 - structured public consultation: Further input - Requirements for the development and assessment of mechanism methodologies”

Dear Members of the Supervisory Body:

The [Clean Cooking and Climate Consortium \(4C\)](#), a group of partners [1] led by the Clean Cooking Alliance, appreciates the opportunity to submit this short comment in response to the “Call for input 2023 - structured public consultation: Further input - Requirements for the development and assessment of mechanism methodologies.”

This letter concerns Section Seven on “non-permanence and reversals” of the draft recommendation [A6.4-SB007-AA-A##](#). In particular, we would like to make observations/comments regarding Paragraph 34 of the RMP, which states that “Mechanism methodologies shall (...) address reversals, where applicable.”

While emission reductions from projects that displace non-renewable biomass consumption are in many aspects functionally similar to credits derived from carbon removal projects, we believe that introducing a requirement to track the biomass saved by these project activities would be impractical for the following reasons:

- Activities that displace non-renewable biomass consumption are highly diffuse, and it is very difficult to define the boundaries of areas that are impacted by specific projects. This applies for projects that target to displace firewood collected by participating households but is even more relevant for projects that displace charcoal in urban or peri-urban centers, because the biomass used to produce charcoal often originates from multiple production areas serving multiple markets.
- Even if those areas can be identified and have well-defined boundaries, attributing changes in biomass stocks to project activities is very difficult because in most cases, biomass cover is affected by multiple human and natural processes.
- There is consensus in the scientific community that consumption of non-renewable biomass linked to the use of fuelwood and charcoal contributes mainly to degradation rather than deforestation. Degradation is much more difficult to measure (even without considering the diffuse boundaries and attribution challenges described above). Demonstrating measurable impact on degradation would require the use of sophisticated remote sensing techniques with extensive ground truthing and/or the creation of semi-permanent plots in both project and non-project areas. Both of these options would

**Clean Cooking and Climate
Consortium (4C)**

require specialized knowledge and investment that are beyond the capabilities of most or all project implementers.

Furthermore, activities that displace non-renewable biomass and apply a value of fraction of non-renewable biomass (fNRB) to the emissions reduction calculations account for some permanence risk by accounting for the balance between tree offtake and regeneration. In other words, by applying an fNRB value, emissions reductions are only credited from biomass that would not have regrown without the project activity.

4C thanks the Article 6.4 Supervisory Body for its consideration of our views and looks forward to assisting the UNFCCC's work to drive integrity, credibility, and trust in the cooking and carbon markets. Please do not hesitate to reach out if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Elisa Derby".

Elisa Derby
Sr. Director, Climate Science and Standards
Clean Cooking Alliance

[1] Led by the Clean Cooking Alliance (CCA), 4C is a group of partners supporting countries' efforts in using cooking energy interventions to achieve climate goals as part of their Nationally Determined Contributions (NDC) targets or through the international carbon market. In addition to CCA, 4C members include the United States Environmental Protection Agency (U.S. EPA), the United Nations Framework Convention on Climate Change (UNFCCC) secretariat, the Climate and Clean Air Coalition (CCAC), Berkeley Air Monitoring Group (Berkeley Air), and Stockholm Environmental Institute (SEI).