

May 14, 2025

Dear Secretariat, Methodological Expert Panel, Article 6.4 Supervisory Body, and other relevant colleagues,

On behalf of the [Clean Cooking and Climate Consortium \(4C\)](#), I would like to share our input regarding the [draft standard “Setting the baseline in mechanism methodologies”](#) (A6.4-MEP004-A01), as referenced in the annotated agenda and related annexes for the sixteenth meeting of the Supervisory Body (May 12-16, 2025).

While we are aware that the official deadline for [input submission](#) was May 5, we believe it is important to raise the following points, given their relevance to methodologies for clean cooking interventions, such as the CLEAR methodology recently submitted for consideration under Article 6.4 use.

Specifically, the points below address concerns regarding paragraphs 16 and 22 of A6.4-MEP004-A01, which require that the degree of conservativeness of mechanism methodologies be based on the level of uncertainty, and that “all causes of uncertainty shall be considered, including uncertainty in data (e.g., measurements), parameters (e.g., representativeness of default values), assumptions (e.g., the baseline scenario), and methods (e.g., models to quantify emission reductions).”

1. **Complexity and number of parameters in cookstove carbon projects.** Estimating emissions reductions from cooking energy transitions involves many different parameters, including fuel consumption, fraction of non-renewable biomass (fNRB), stove use, emission factors, stove thermal efficiency, among others. These parameters draw from diverse data sources and are subject to significant variability across different contexts.
2. **Unrealistic burden on project proponents.** Requiring project proponents to estimate the uncertainty of each of these parameters is impractical, as it would require specialized expertise and considerable financial and technical resources that many proponents, particularly in low-income countries, cannot realistically access. This creates a significant barrier to participation in carbon markets. Further, the uncertainty indicators for some parameters would be provided by outside entities (e.g., for global warming potentials, emissions factors, and fNRB) and thus beyond the control of project proponents.
3. **Rigid uncertainty requirements can hamper market viability.** Several key parameters in cookstove projects are dynamic and influenced by changing user behavior. Requiring uncertainty estimations for all parameters and corresponding adjustments to emission reductions introduces a high degree of unpredictability. For instance, basing annual downward adjustments on uncertainty estimations would introduce unpredictability into the ex-ante estimation of emissions reductions without ensuring greater accuracy. This unpredictability would undermine projects’ ability to attract the upfront financing necessary for implementation.

We respectfully urge the Supervisory Body and MEP to adopt a more pragmatic approach to uncertainty, focusing on material sources of uncertainty. For cookstove projects, the primary risks that relate to the baseline include: 1) the risk of a material differences in the circumstances and practices between values measured ex-ante in the baseline scenario and those monitored from project participants; and 2) the risk that the BAU scenario will be decarbonizing over the duration of the crediting period, causing the baseline values to be inflated.

The CLEAR methodology submitted for Article 6.4. consideration provides mechanisms to address these potential risks while balancing rigor and accuracy with the realities of the clean cooking sector.

Thank you for your consideration, even after the formal input deadline. We hope these points can still inform the Supervisory Body's and MEP's deliberations.

Best regards,
Elisa Derby, on behalf of 4C