



CALL FOR INPUT

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Instruction: **Enter your input in the table below.** Stakeholders **must** submit their comments by the established deadline and strictly use this commenting template to ensure their input is duly considered. The use of AI-generated content is **prohibited**, as such submissions frequently lack relevance and fail to address the specific issues presented in the published documents.

General Observations/suggestions:

1. On the requirement of using 'most recent available data not older than 3 years', for Africa, allow triangulation of weaker/older data sources (e.g., NGO surveys, donor evaluations, ESMAP/SE4ALL reports)
2. For the stock-based and time bound thresholds, for Africa and mostly LDCs, allow higher thresholds, consistent with the proposals under the option 2 of the para 63.
3. Given the impact of multiple factors on uptake and scalability of various household level energy access technologies/practices, application of the thresholds and the tool itself might be challenging mainly due to challenges with the uniform definition of geographical boundary, output, capacity, comparable activities etc. Hence, either the relevance of CP tool in such circumstances should be revisited or more flexibility should be allowed with such definitions.
4. In addition to numbers/technology/fuel etc, both financial and non-financial (cultural, institutional etc) barriers should be allowed as part of the CP assessment
5. With a lot of on-ground innovation happening with the definition of CPAs under the POA where in each unit/system can potentially be counted as an individual CPA (e.g., under the WB's Standardized Crediting Framework), clarification is needed on the definitions of various parameters for the CP assessment.
6. The application and various considerations of the tool for the POAs should be urgently clarified given the increasing level of POA type activities in the African context (also links to the point 3 above).

Document reference number and title: A6.4-MEP008-A02. Draft Methodological tool: Common practice analysis (version 02.0)				
Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	3	8	It is stated that: "This tool is applicable to Article 6.4 activities implemented at the project level. The tool may be amended in the future to also cover activities implemented at other scales (e.g. programmes of activities, policies, sectoral approaches, etc.)."	The common practice tool has explicit reference for use in case of projects and not for programmes of activities or large-scale crediting programmes or sectoral approaches. Noting that the same methodology(ies) may get applied at project and PoA level, the need for such distinction should be clarified or the clause for interim till the PoA specific tool emerges may be excluded.
2	6.4.1.1	22	The key is determining the number comparable activities, which the Tool leaves up to the methodologies.	-
3	6.4.1.1	23	It is stated that: "...activity participants may exclude comparable activities that have been registered as an Article 6.4 activity..."	The exclusion of comparable activities from target market size is only spelt in context of A6.4 and not for other carbon markets towards arriving at the similar activities. Activities which are using carbon finance under other carbon programs should also be included in the determination of similar activities.
4	7.4	56	It is stated that: "To define comparable activities, the mechanism methodology may specify further conditions than those specified in section 6.4 above. This may also include different criteria for least developed countries (LDCs) and small island developing states (SIDS), where appropriate."	There may be special consideration for how to determine comparable activities for LDCs and SIDS in the tool itself rather than keeping it at the methodology level wherein variations could emerge.
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