

Input to SBM 023 on clean cooking methodologies and reversal risk

Comments on agenda item 3.4 (methodologies) | 28 September 2026

Overall position

The Supervisory Body should adopt the MEP recommendations as the minimum credible integrity package, while retaining conservative safeguards where evidence is incomplete. Decisions should be grounded in the best available science, robust monitoring and consistency with existing Article 6.4 standards.

Topic and requested decision	Comments and rationale
1. Reversal risk assessment tool A6.4-MEP016-A07	• Adopt the tool and retain its empirical approach to natural reversal risk. Observed and modelled disturbance data provide a more credible basis than predominantly qualitative scoring or project-level claims about risk management. • For human-induced risk, select conservative default values. A relatively high gross risk factor should be combined with cautious risk-reduction factors. In particular, the lowest gross risk assumption should not be combined with the highest reduction factors. • Coverage by an NDC, long-term strategy or REDD+ framework should not, by itself, be treated as evidence that deforestation risk has been effectively reduced. Risk reductions should reflect demonstrated implementation and outcomes where feasible. • Do not replace or defer buffer contributions through alternatives that weaken immediate coverage of reversal risk. The credited benefit depends on maintaining higher landscape carbon stocks than under the baseline, and those stocks remain exposed to natural and human-induced loss. • Adoption should be followed by evidence-based review; it should not imply that the wider permanence framework is already sufficient.
2. Energy efficiency measures in household cooking A6.4-MEP016-A03	• Adopt the methodology with its non-permanence provisions and the immediate forwarding and cancellation arrangements for buffer units linked to biomass-based emission reductions. Removing these provisions would create an accounting gap.

Topic and requested decision	Comments and rationale
	• Apply the 1% annual downward adjustment rather than granting an exemption. Health and development benefits are important, but do not substitute for progressively more ambitious crediting baselines. • Strengthen the transition to direct usage monitoring. The 2029 date for mandatory stove use monitors is lengthy; it should be brought forward where practicable. Conservative caps should apply while survey-based estimates remain permitted. • Require sufficiently frequent kitchen performance tests, preferably annually, to capture changes in fuel use and reduce over-crediting risk. Retain the 4.5% autonomous-adoption threshold unless stronger evidence supports revision.
3. Cooking energy transitions A6.4-MEP016-A01	• Adopt the methodology only with robust safeguards for biomass-related reversal risk, direct usage monitoring, conservative baseline setting and the annual downward adjustment. • Retain the MEP decision not to exempt the methodology from the annual downward adjustment. Its historical-emissions baseline approach does not provide a sound basis for an exemption. • Bring forward mandatory stove use monitoring where feasible and preserve conservative treatment of survey-only estimates during the transition. Stove use monitoring is empirically more reliable than survey-only estimates. • Exclude LPG from eligibility. If LPG remains eligible, establish a tightly limited pathway with a credible no-lock-in test, alignment with host-country decarbonization pathways, and evidence that lower-carbon alternatives are not feasible. Article 6.4 finance should not create new dependence on fossil-fuel infrastructure.

Closing

Adopting this package with conservative safeguards would provide a credible starting point for Article 6.4 clean-cooking activities. Future revisions should be evidence-led and should strengthen, rather than dilute, environmental integrity as monitoring data and implementation experience accumulate.