



**Approved baseline and monitoring methodology /  
methodological tool clarification response form  
(Version 03.0)**

**INFORMATION TO BE COMPLETED BY THE SECRETARIAT OR PANEL / WG**

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| <b>Date and number of Panel / WG meeting:</b>  | 17–20 February 2020 / MP 81  |
| <b>Title/Subject of the request for clarification:</b>   | Inclusion of solar electric cookers as a new technology/measure in a PoA applying AMS-I.E and AMS-II.G, and currently distributing improved biomass cookstoves   |
| <b>Reference number of the request for clarification:</b>  | SSC_773  |
| <b>Exact reference (number, title and version) of the methodology or methodological tool to which the request for clarification applies:</b> | AMS-I.E.<br>Switch from non-renewable biomass for thermal applications by the user --- Versions 3.0 and 10.0<br><br>AMS-II.G.<br>Energy efficiency measures in thermal applications of non-renewable biomass --- Versions 3.0 and 10.0 |
| <b>Fast track or Regular track:</b>  | <input type="checkbox"/> Fast track<br><input checked="" type="checkbox"/> Regular track   |

**Summary of the request for clarification**

**Original text from CME:**

We valued the CDM's clarification opinion in response to our clarification request (SSC-756) of 11/07/2019 concerning our PoA 7014: Improved Cook Stoves for East Africa (ICSEA).

Our subsequent submission of a post-registration change (PRC-7014-004) to add thermal conduction solar cooker models that are powered by each household's own solar generated electricity was however rejected by the CDM-EB (CDM-POA7014-RULE02), citing in Section (c), that "The reasons and rationale for the final decisions are:"

**"Reasons and Rationale (i)"** Solar cooker and renewable biomass cook stove are not considered as same technology and therefore does not meet the requirement as per paragraph 167(b) of PS-PoA, version 2.0."

However, our reading of paragraph 167(b) where there are two options, and option (ii) guided us by its text "Two different project activities are considered to be using the same technologies if they:

(i).... or

**(ii) Undertake the same course of action that results in the same kind of effect (e.g. two projects using the same management practice such as fuel switching);**

So we understood from this that "the same course of action" indeed covered households cooking food either using NRB biomass or solar electricity, and so we submitted our PRC based on this understanding.

**"Reasons and Rationale (ii)"** Further, paragraph 238(g) of PS-PoA, version 2.0 is not applicable, as the proposed change (i.e. adding solar cooker and the new generic CPA-DD) is not a post registration change to the technology in the registered PoA (renewable biomass cook stove) considering that the renewable biomass cook stove is neither modified nor replaced by the solar cooker. In fact, the solar cooker is an addition to the biomass cook stove."

However, paragraph 238 states that "Changes to a registered PoA shall be limited to:...

"... (g) Changes to the technologies/measures that result in the same technologies/measures as in the registered technologies/measures as per the definition of "the same technologies" in paragraph 167(b) above".

Our understanding is that the biomass-fueled stoves in use as the baseline stoves described in the

registered PoA, do indeed perform the same measures (households cooking food) as the proposed solar cookers, and that paragraph 167(b) cited above therefore treats the described solar cookers as per the definition of “the same technologies”.

Furthermore, our PRC request explained that all the distributed solar cookers (as Improved Cook Stoves – ICS) would replace baseline traditional stoves (unimproved Cook Stoves). The Reasons & Rationale (ii) above is not correct in stating, “...the renewable biomass cook stove is neither modified nor replaced by the solar cooker”. Each supplied solar cooker will in fact replace the biomass stoves that are currently in use by the client households, and the combined tracking and monitoring work of the CPA and the CME will allow this to be carefully monitored. It is also incorrect for it to be stated in the Ruling Note’s Reasons & Rationale (ii) that “In fact, the solar cooker is an addition to the biomass cook stove.”

The solar cookers will 100% replace the inefficient biomass stoves that are currently in use by the client households. No stove stacking will be permitted (in accordance with the revised PoA-DD), and there is no plan of any sort, for the solar cooker to be “an addition to the biomass cook stove”.

We are concerned that EB members were given the wrong information about the way that the improved cook stove (ICS) solar cookers will be introduced as replacement stoves, with their zero GHG emissions, clean indoor air benefits, no gathering of biomass fuel, and self-generated solar electricity, and we are disappointed that the EB subsequently rejected solar cookers and the game-changing “ECOCA solar-powered micro-kitchen” CPA into the ICSEA PoA.

The solar cooker is not, in the words of the ‘Ruling Note – Rationale for the rejection of PRC-7014-004’ “an addition to the biomass cook stove<sup>1</sup>” of the existing local traditional cooking technology, but instead it 100% replaces all the traditional unimproved stoves used previously by the recipient households. The ICS solar cooker is also a 100% fuel-switch from NRB to electricity, hence its eligibility under AMS-I.E<sup>2</sup>. The PoA CME is experienced and able to monitor the use of these improved stoves using its usual survey methods.

Our rejected (PRC-7014-004) application provided for the solar cookers to fully displace all pre-project cooking devices in the project households’ kitchens, and its use would be monitored by us (as the CME) following the normal CDM requirements for sampling and surveys, including confirmation that no pre-project cooking devices were being used, and that any use of such stoves would be subject to the revised PoA-DD’s provision for “Adjustment for continued use of baseline stoves”.

The switch by households to the use of a solar-powered cookstove ensures an ‘emissions free’ environment with no indoor air pollution, no requirement for the gathering of biomass fuel (whether renewable or non-renewable) and no more risks to the women and children whose task it mostly is to gather such fuel.

It is expected that there will be a widespread distribution of this particular solar cooker to refugees (the first targeted users of the ECOCA stove by the CPA applicant), host communities and other households and institutions in Uganda, and other parts of Africa where solar-powered improved cooking devices like these are on the increase. This will result in a dramatic drop to zero use of NRB fuel by these users.

The proposal by the EB, that we should submit a new PoA to cover solar cookers, is not feasible given the costs involved, when we believe that our multi-meth PoA 7014 already provides us with the ability to add “solar cookers” under AMS-I.E. in the up-coming RCP PoA-DD update as a “PART II. Generic component project activity (CPA) TYPE 3: CPAs applying only AMS-I.E. (version 10.0)”.

Our request to the Meth Panel is to provide us with a clarification on whether our earlier intention to submit a Renewal of the Crediting Period (RCP) request for our PoA 7014, with an updated PoA-DD with the latest versions of AMS-II.G and AMS-I.E, and explicitly referring to solar cookers and other improved cooking devices, is now the correct procedure for us to follow, instead of submitting a Post Registration Change.

#### Clarification by the secretariat or Panel / WG

The Meth Panel would like to thank the stakeholder for the submission. The Meth Panel analysed the request and agreed to clarify, that it is outside the scope of the Meth Panel’s mandate to determine whether a change to a PoA is eligible via a post registration change (PRC) request at/before/after the renewal of the crediting period.

The Meth Panel noted that applicability of the methodology AMS-I.E. for solar induction/electric cooker has been clarified already in the response to SSC\_756.

<sup>1</sup> CDM –POA7014-RULE02 section 1.(c) (ii)

<sup>2</sup> Clarification response (23/07/2019) to our request (SSC-756) of 11/07/2019

All requirements under the CDM regulatory documents shall be met to be able to include a new technology/measure under an existing PoA.

**Version(s) of the approved methodology / methodological tool to which the clarification is applicable:**

AMS-I.E. Switch from non-renewable biomass for thermal applications by the user --- Versions 3.0 onward  
 AMS-II.G. Energy efficiency measures in thermal applications of non-renewable biomass --- Versions 3.0 onward

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**Document information**

| <i>Version</i>   | <i>Date</i>  | <i>Description</i>   |
|--|--------------|--|
| 03.0   | 13 May 2016  | Revised to include the row "Version(s) of the approved methodology / methodological tool to which the clarification is applicable"   |
| 02.0   | 18 July 2013 | Revised to remove the row "Date and signature of the chair and vice chair of Panel/WG (in case of clarification by Panel/WG)"  |
| 01.0   | 4 July 2013  | Initial publication. This document supersedes and replaces the following documents: <ul style="list-style-type: none"> <li>• Recommendation Form for Small Scale Methodologies (F-CDM-SSCwg) (Version 01.1)</li> <li>• Recommendation Form for Small Scale A/R Methodologies and Procedures (F-CDM-SSC-AR) (Version 01.1)</li> </ul> |
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