I.I Background

Sigma Global is a project participant in two improved cook stove projects in Malawi under AMS-II.G that are currently undergoing validation, and has also developed improved cook stove projects under AMS-I.E. As such, we have experience with developing projects using a range of stove designs and methodologies in a number of locations.

applications of non-renewable biomass

I.2 Response

Our response to each question posed in the consultation is as follows.

I.2.1 Phased implementation

Implementation of stoves in a phased manner is likely due to the large numbers of devices that are normally involved in improved cooks stove projects. A standardised approach to account for phased implementation in the methodology would assist project developers by simplifying project design. The installation date of each device should be tracked individually, and emission reductions should be calculated from the date of commissioning of each device.

I.2.2 Continued usage of baseline stoves

The best solution for monitoring any continued use of baseline stoves will depend of the project circumstances. It is recognised that stove utilization monitors can provide statistically reliable information using smaller sample sizes than are required for a qualitative or quantitative survey methods. However, access to technology such as stove utilization monitors is not always available at project locations, and a qualitative or quantitative survey approach may be more appropriate. We would support maintaining flexibility for project developers to select the best solution for monitoring any continued use of baseline stoves from a number of options specified in the methodology, including stove utilization monitors, qualitative and quantitative surveys.

1.2.3 Determination of the quantity of woody biomass

We agree that methods to determine the quantity of woody biomass allowed under the methodology need to be clarified, and propose that a number of methods be specified to allow project developers to choose the method most suitable to local project conditions. We strongly support the introduction of standardised baselines and the introduction of the ability to account for suppressed demand of baseline woody biomass use. Both options would assist in bringing the benefits of improved cook stoves to those that need it most.

I.2.4 Monitoring of stove efficiency

Subject to determining if a simplified approach is conservative and equally valid for different technologies used under PoAs, we would support the use of an appropriate default discount factor to account for efficiency loss over time. This would be in preference to use of a standard curve for the efficiency loss which is not available for all stove types.

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1.2.5 Options to deal with frequent issuance requests when monitoring requirements are not provided

Monitoring of stove usage rates is a key part of the project activity and we do not believe that it is appropriate to request issuance prior to undertaking a monitoring survey. We would support the requirement that a survey be undertaken for each monitoring period to ensure emission reduction calculations are realistic and conservative.

1.2.6 Minimum required information on project technology

We believe that the current version of the methodology specifies the inclusion of sufficient information on the project technology through:

- The methodology requirement that the stoves have a specified efficiency of at least 20; and
- The description required of the technologies and/or measures in Section A.3 of the SSC PDD.