



Proyecto Mirador
LA ESTUFADOS POR TRES

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November 8, 2023

Re: Call for public input on the info note "Info note: Default values for fraction of non-renewable biomass (fNRB)" (13 October to 3 November 2023, 23:59 CEST).

To Whom It May Concern:

I am the Founder and Chairman of Proyecto Mirador, a non-profit organization that has built over 320,000 "Dos por Tres" cookstoves in the poorest communities of Honduras and Guatemala, helping more than 1.3 million people rid their homes of indoor smoke from cooking. We provide steady jobs for 265 employees, including 40 microenterprises, in areas where equitable, full-time employment is scarce. Proyecto Mirador was the fourth cookstove project in the world to achieve Gold Standard certification, and the first in Latin America.

Since we began building stoves as a Gold Standard project in 2009, we have relied on carbon proceeds to fund our expansion and sustain our operations. All of our carbon proceeds go into building more stoves. Since project inception, we have received at least 6,477 written requests from community leaders requesting the implementation of the stove project in their communities. We do not spend money on marketing.

Since becoming certified by the Gold Standard, we have gone out of our way to ensure that the NRB values we report are conservative and based in the best science currently available. However, we have always been aware that the NRB value is highly variable between the communities where we work.

First, Honduras and Guatemala both include large areas of rainforest that we do not serve due to their inaccessibility, or due to criminal activity, or both. These areas are included in the fNRB calculations for national defaults, pulling fNRB values sharply downward, but do not translate well to the reality on the ground where deforestation is already extreme and still worsening.

Second, fuelwood demand for cooking is affected by numerous and unpredictable factors, such as social and political unrest, global commodity prices, and the global inflationary environment.

Nevertheless, there seems to be an assumption that accurate fNRB figures exist. This assumption has ultimately fed the narrative that carbon projects are universally bad.

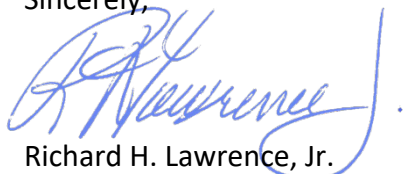
The fact is that project developers have never reported more than a guess at fNRB. We do not have the right fNRB values, and there is no way to reach them. Due to the high variability of fNRB, both geographically and over time, it is unrealistic to expect that any validated fNRB figure is anything but a moving target. To reach some level of accuracy, the figure would have to be recalculated for each municipality, village, or even neighborhood—every year, for every place in the Global South.

The fNRB values proposed in the UNFCCC's Info Note are low enough to put most carbon cookstove projects out of business almost immediately. Absent a better option, the media will pick up these values and assume them to be accurate. Ironically, by doing so, the UNFCCC is killing the cookstove industry — one of the only areas of carbon finance that reaches households directly and touches the poorest of the poor.

Per the Info Note, fNRB calculations include “dozens” of assumptions, which underlines the difficulty of achieving accuracy. The UNFCCC has given only two weeks to comment. If the cookstove community is to perform a fair analysis, two weeks is not enough. The future of cookstoves cannot rest on the work of a small handful of individuals. We need to question the entire approach, let alone the published result. This will involve a deep dive into the hard science and can only happen with help from a diverse group of scientists and academics.

I respectfully request that the comment deadline be extended by at least 3 months.

Sincerely,

A handwritten signature in blue ink that reads "Richard H. Lawrence, Jr." with a stylized flourish at the end.

Richard H. Lawrence, Jr.
Chairman