



## Stakeholder Communication Form (Version 01.0)

*This form shall be used for any CDM-related communication with the UNFCCC secretariat or the CDM Executive Board. All the questions are mandatory unless otherwise indicated.*

*The completed form and any supplemental documents shall be submitted electronically to [cdm-info@unfccc.int](mailto:cdm-info@unfccc.int), or via fax to +49-228-815-1999 or via post to: Sustainable Development Mechanism (SDM) Programme, UNFCCC secretariat, P.O. Box 260124, D-53153 Bonn, Germany.*

### SECTION 1: COMMUNICATION HEADER

*Please provide your contact information.*

**Title:** Mr.                      **First Name:** William                      **Last Name:** Farmer

**Name of Organization:** Improved Cook Stoves for East Africa (ICSEA) Ltd                      **E-mail Address:** billfarmer@ugandacarbon.org

**Postal Address:** P.O. Box 70480, Kampala                      **Phone Number:** 256752644611  
**Country:** Uganda                      *Include country code (e.g. +49-228-815-1999)*

**Stakeholder Type:** CDM Coordinating/Managing Entity (CME)                      If other:

*Please indicate from whom you would like to get an answer.*

**This communication is addressed to<sup>1</sup>:** Chair of CDM Executive Board (normal track)

### SECTION 2: PROJECT ACTIVITY OR PROGRAMME OF ACTIVITIES (PoA)

*If this communication refers to a specific CDM project activity/PoA, please answer questions in this section (otherwise proceed to Section 3).*

**Project/PoA Ref. Number**                      7014                      If applicable, CPA Ref. Number:  
5-digit# format 01234                      8-digit# format 0123-4567

**Project Cycle Stage**                      Renewal                      If other:

*If there is no specific CDM Reference Number, please answer the remaining questions in this section (otherwise proceed to Section 3).*

**Host Country(ies)**                      Uganda Kenya Rwanda Burundi South Africa Lesotho Ethiopia

**Project/PoA Title**                      Improved Cook Stoves for East Africa (ICSEA)

**Technology Type**                      Other                      If other: Improved household cookers & fuel switch

### SECTION 3: YOUR COMMUNICATION

**Title/Subject**  
Maximum 250 characters                      Addition of methodology AMS-I.K household solar cookers to PoA 7014 as a Post-Registration Change together with the renewal of the PoA crediting period

**Communication Text**  
Include background, details, and conclusion (unlimited length)

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 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

<sup>1</sup> In accordance with the "Procedure: Direct communication with stakeholders" (version 02.0), stakeholders may address communications either (a) to the secretariat, in order to seek a fast-track technical or operational explanation regarding the implementation of existing CDM rules, or (b) to the CDM Executive Board, in order to communicate to the Board their views on CDM rules and their implementation, or to seek official clarifications of CDM rules.

PS-PoA, version 2.0.”

However, our reading of paragraph 167(b) 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).”

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.”

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 in fact 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 addition of this game-changing “ECOCA solar-powered micro-kitchen” to 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 ” 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 . 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.

	<p>Following the comments that we have made about the two Reasons &amp; Rationale texts above:</p> <p>The CME is requesting a Direct Communication with the CDM Secretariat to discuss the above points and to identify a positive way forward.</p>
<b>Supplemental Documents</b> <i>If applicable, list the title(s) of any attached file(s) or link(s)</i>	<ol style="list-style-type: none"> <li>1. Information Discussion Document (Version UCB 05.0)</li> <li>2. Secretariat Clarification SSC_756, Eligibility of an induction cookstove model that is powered by the user's solar generated electricity</li> <li>3. Ruling note. Rationale for the rejection of PRC-7014-004</li> </ol>
<b>This communication may be made public</b>	Yes

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### Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	02 March 2015	<p>This form supersedes and replaces the following:</p> <ul style="list-style-type: none"> <li>• F-CDM-RtB: <i>Form for submission of Letters to the Board</i> (version 01.2)</li> <li>• F-CDM-RtB-DOE: <i>Form for communication on policy issues initiated by AEs/DOEs</i> (version 01.1)</li> <li>• CDM-RtB-DNA: <i>Form for communication on policy issues initiated by DNAs</i> (version 01.1)</li> </ul>
Decision Class: Regulatory Document Type: Form Business Function: Governance Keywords: communications		

## Information Discussion Document (Version UCB 05.0)

<b>Name of the author:</b>	William Farmer
<b>Affiliation:</b>	Coordinating/Managing Entity (CME) of CDM PoA 7014 –Improved Cook Stoves of East Africa (ICSEA) Ltd
<b>Subject:</b>	<p>Renewal of the PoA 7014 crediting period, and the options for the CME of either:</p> <p><b>Option 1)</b> preparing a new version of the PoA-DD in accordance with the CDM Project Standard for PoAs to update the 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; or</p> <p><b>Option 2)</b> a combined submission of a request for a Post-Registration Change (PRC) to the PoA to add the methodology AMS-I.K solar cookers, together with the renewal of the PoA crediting period with updated PoA-DD with the latest versions of AMS-II.G., AMS-I.E. and AMS-I.K.</p> <p>In either option, such changes would <i>inter alia</i> accommodate the inclusion of CPAs distributing solar cookers, as confirmed in Clarification SSC_756 as being eligible under AMS-I.E.<sup>1</sup> .</p> <p>Solar cookers are welcomed in the latest version of methodology AMS-I.E Version 10 (page 3), 1.Introduction, Para 1, Table 1 – “Typical projects” – Generation of thermal energy by introducing renewable energy technologies for end users that displace the use of non-renewable biomass.</p> <p>Examples of these technologies include, but are not limited to biogas stoves, solar cookers or passive solar homes.”</p>
<b>Methodologies currently used</b>	<p>AMS-II.G. Energy Efficiency Measures in Thermal Applications of Non-Renewable Biomass (version 03) - upgrading to version 10</p> <p>AMS-I.E. Switch from non-renewable biomass for thermal applications by the user (version 06.0) - upgrading to version 10</p>
<b>Contact Information:</b>	<p>William Farmer</p> <p><a href="mailto:billfarmer@ugandacarbon.org">billfarmer@ugandacarbon.org</a></p>

<sup>1</sup> At the upcoming World Bank Global Off-Grid Solar Forum (Nairobi 18-20 February) the Clean Cooking Alliance will facilitate a discussion of the status of solar-powered e-cooking solutions and how to leverage partnerships between the off-grid solar energy and clean cooking sectors. We hope to present our experience of trying to support such e-cooking solutions with our CDM PoA 7014.

<b>Date and signature of the author:</b>	15/01/2020  
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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).

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**“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) 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);**

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.”

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 in fact 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 addition of this game-changing “ECOCA solar-powered micro-kitchen” to 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>2</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>3</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.

Following the comments that we have herein made about the two Reasons & Rationale texts above:

The CME is requesting a Direct Communication with the CDM Secretariat to discuss the above points and to identify a positive way forward, and thanks in advance all readers of this Information Discussion Document for their useful comments and advice.

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<sup>2</sup> CDM –POA7014-RULE02 section 1.(c) (ii)

<sup>3</sup> Clarification response (23/07/2019) to our request (SSC-756) of 11/07/2019



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

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

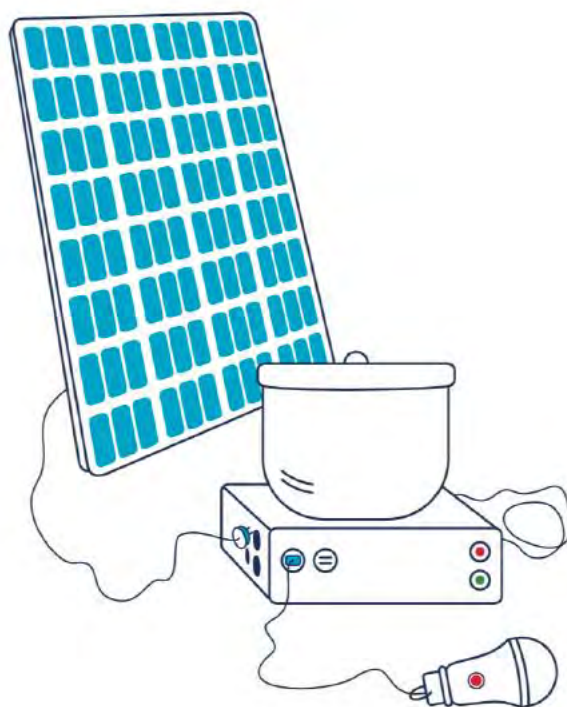
<b>Date and number of Panel / WG meeting:</b>	N/A
<b>Title/Subject of the request for clarification:</b>	Eligibility of an induction cookstove model that is powered by the user's solar generated electricity
<b>Reference number of the request for clarification:</b>	SSC_756
<b>Exact reference (number, title and version) of the methodology or methodological tool to which the request for clarification applies:</b>	AMS-II.G. Energy Efficiency Measures in Thermal Applications of Non-Renewable Biomass (version 03) AMS-I.E. Switch from non-renewable biomass for thermal applications by the user (version 06.0)
<b>Fast track or Regular track:</b>	<input checked="" type="checkbox"/> Fast track <input type="checkbox"/> Regular track

**Summary of the request for clarification**

**Original text from Stakeholder:**

We would value your opinion about this request for clarification concerning our registered PoA - ref 7014: Improved Cook Stoves for East Africa (ICSEA).

An applicant wishes to use our PoA to distribute a newly designed solar induction cooker and associated solar panel that involves the complete replacement of non-renewable biomass (NRB) by self-generated solar energy. This will lead to a complete fuel switch, thereby reducing greenhouse gas emissions accordingly.



**ECOCA solar-powered micro-kitchen**

The ECOCA solar-powered micro-kitchen is a compact, self-contained, multi-purpose home unit consisting of an electric stove top, a battery pack and a solar panel array. The small and lightweight unit is simple and intuitive to use daily in both rural and urban settings. The ECOCA solar-powered micro-kitchen also comes with a highly insulated pot that will keep food warm for hours.

The reading of each appliance's logger will provide the real consumption of energy that is used instead of NRB. A logger installed in each device records the usage of energy for cooking every 60 seconds.

To adjust (if necessary) for any other use of the solar cooker for purposes other than cooking, a periodic qualitative sample survey will be undertaken. This survey will take place when the loggers are read. This approach ensures that the actual energy consumption of a solar cooker for cooking is recorded.

Having read **SSC\_749: Clarification on the applicability of AMS I E version 09.0 for Induction cook stoves project in Nepal** we are concerned that this should not create a precedent preventing our inclusion of this type of solar powered induction cookstove under our PoA.

It is anticipated that there will be a widespread distribution of this stove to refugees and host communities in Uganda, and that this will result in a dramatic drop in their use of NRB.

**Further clarification from the Stakeholder received on 19-Jul-2019:****Thermal conduction heating (our solution)**

This is quite basic. Inside our cooking pot there is placed a heating pad which is providing thermal conduction heating on the surface of our inner pot. Our pot is the effective solution here, coming as a double layered pot, which is making it highly insulated and thus very effective. We utilize the DC power generated in the solar system, which makes us capable of "drinking the water directly from the source" (i.e. DC to DC) - not losing a lot of energy in the transformation. Our innovation comes through the combination of these technologies, which has not been seen before. Namely; Highly effective PV-panels, LiFePo4 batteries (new technology), MPPT-controller, our own motherboard for controls and the highly insulated pot.

System is built upon this formula:

(PV-panels -> Solar charge control unit (MPPT) -> LiFePo4 battery) -> Heating pad inside our pot

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

The secretariat would like to thank the author of the submission and would like to clarify as below:

- Solar cooker using direct current (D.C.) heating element with associated equipment (e.g. solar panel, charge controller, storage battery, balance of systems) is eligible under AMS-I.E.: Switch from non-renewable biomass for thermal applications by the user but not under AMS-II.G.: Energy efficiency measures in thermal applications of non-renewable biomass.
- The periodic survey referred shall comply with requirements of applied methodology and Standard for Sampling and surveys for CDM project activities and programmes of activities and Guidelines for sampling and surveys for CDM project activities and programme of activities. It shall also capture any continued use of pre-project cooking devices using non-renewable biomass, e.g. see paragraphs 21, 23 of AMS-I.E. ver. 6.0.

**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

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**Document information**

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<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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Decision Class: Regulatory

Document Type: Form, Clarification

Business Function: Methodology

Keywords: applying methodologies and tools

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**CDM-POA7014-RULE02**

Ruling note

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Rationale for the rejection of PRC-7014-004

Version 01.0



**United Nations**  
Framework Convention on  
Climate Change

1. The CDM-Executive Board decided to reject the proposed request for post-registration changes for CDM programmes of activities 7014 on 28 November 2019 at its one hundred and fifth meeting, in accordance with the “CDM project cycle procedure for programmes of activities” (PCP-PoA), version 02.0, paragraphs 162. Further, in accordance with paragraph 163 of the PCP-PoA, the ruling shall contain an explanation of the reasons and rationale for the final decision.

(a) The request for post-registration changes “PRC-7014-004: Improved Cook Stoves for East Africa (ICSEA)”, proposed to:

- (i) Expansion of PoA geographical boundary to include a new host party (i.e. Ethiopia); and
- (ii) Changes to the technologies/measures that result in the same technologies/measures as in the registered technologies/measure (i.e. addition of new technology, solar cooker) and the corresponding generic CPA-DD.

The DOE (Carbon Check) failed to demonstrate compliance with the requirements of the Procedures and the applicable Standard as mentioned in paragraph (b) below.

(b) The relevant requirements are:

- (i) CDM PS for PoA version 2, paragraph 238(g) states that “Changes to a registered CDM 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).
- (ii) CDM PS for PoA version 2, paragraph 167(b) states that “Technology: equipment or conversion process used for the production of goods or provision of services. Two different project activities/CPAs are considered to be using the same technology(ies) if they: (i) Provide the same kind of output and use the same kind of equipment and conversion process; 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).

(c) The reasons and rationale for the final decisions are:

- (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.
- (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.

- (d) Additionally, the Board acknowledges the good intent of coordinating and management entity (CME) and therefore encourages the CME to submit this change request (solar cooker) as a new programme of activity (PoA) registration request for its consideration, after due validation by a designated operational entity (DOE).

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### Document information

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<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	2 December 2019	Initial publication. Related to CDM project cycle procedure for programme of activities (CDM-EB93-A09-PROC, version 02.0) (Paragraphs 162, 163).

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Decision Class: Ruling

Document Type: Ruling Note

Business Function: Registration

Keywords: E-0052, PoA7014, calculations, household appliances, post-registration change, technology

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