

20 October 2023

BeZero Carbon (BZC) Household Devices Methodology

Dear BeZero team,

We are writing to you to provide detailed feedback, collated from our members, on your Household Device methodology which was published in September 2023.

We appreciate the opportunity to provide such feedback and it has galvanized action within the Forum to respond.

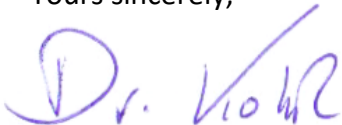
The Project Developer Forum (www.pd-forum.net) is a collective voice to represent the interests of companies developing greenhouse gas emission reduction projects in international markets, including in the Voluntary Carbon Market (VCM), with more than 40 current members from diverse international jurisdictions. We have a dedicated Household Devices working group within the Forum, which represents leading project developers involved in the sector.

We have also collated feedback from non-member project developers in the sector, so this is fairly comprehensive in nature. Our feedback is extensive, and the general impression is that this methodology would be more effective if it had been developed with greater advance consultation with practitioners to ensure that it reflects the realities of project implementation.

We stand ready to answer any question you may have on this feedback, which we will also publish on our website and via our communication channels.

We look forward to working with you on this and other matters in the future.

Yours sincerely,



Dr. Sven Kolmetz (on behalf of our members & including feedback from non-members)
Chairman, PD-Forum

BZC Household Device Methodology Feedback

- 1) According to your rating eligibility (page 20), BZC will only rate a project if they have public access to the crediting calculations which makes sense. However, VCS projects are not required to share their ER calculation sheets publicly on the platform. Similarly, for older projects/verifications the ER calculation sheet has not always been made publicly available in GS registry. This may hinder the rating of these projects? A suggestion would be contacting the PD directly to ask for these calculations and any other information that can help inform the overall rating of the project?
- 2) There is a misleading statement regarding additionality demonstration for micro-scale VPAs using a positive list - Box 4 (page 24) and Figure 9 (page 25). While it is true that the rules for demonstrating additionality can differ between micro-, small-, and large-scale projects, there are some cases where the rules are exactly the same. For instance, in the case of GS, it is possible to use “deemed additionality” for additionality demonstration, which is not limited only to micro-scale projects but is applicable for all projects (regardless of scale) located in LDC, SIDS, and LLDC countries.
- 3) In the over-crediting section (page 48), BZC states that they prefer the use of the WISDOM model when calculating the fNRB value for a project. Will BZC just compare the project fNRB value to that of the WISDOM model, or will they also be willing to ask for and assess the fNRB calculations/report used by the PD if the value was calculated independently? Additionally, household device projects have shorter crediting periods compared to NBS projects for example. During the crediting period renewal, certain parameters are re-evaluated and updated. For instance, GS mandates reassessment of fNRB based on the most recent information available at the time of renewal, which occurs every five years.
- 4) The WISDOM model also contains significant uncertainties (such as using a dataset from 2009 and making assumptions regarding travel time to accessible biomass). Applying any default value for a specific jurisdiction fails to account for project-specific criteria, such as the accessibility and usage of renewable fuels in remote communities. It also fails to acknowledge the difference between project types, for example a charcoal project relies on a completely different fuel source to a wood stove project (one sources fuel from a ‘market’, one via local collection), which can impact significantly the fNRB calculation. This is why fNRB calculations at the project level are still an appropriate approach; which could be tempered by a justification for why the value is at variance to WISDOM etc. CO2 emissions reduction calculations should prioritize accuracy over conservativeness, and localized fNRB studies, particularly for rural woodfuel projects, can still be the most appropriate. We would propose a more flexible approach for such projects, that is not automatically penalized by ratings agencies for being at variance to modelled defaults.
- 5) In Box 22 on page 52, an ICS project in Malawi is discussed and it is said that they used a WBT to determine a “lower thermal efficiency of 25.6%” and also mentions using a KPT to determine efficiency. You are mixing these approaches up: WBTs are used to determine thermal efficiency of the stove and KPT’s determine the fuel efficiency, as stated earlier on in the “Thermal Efficiency” section. Box 22 is also confusing, it states that WBTs “can be driven by myriad factors such as geography, climate, and cooking practices” and then argues that there is uncertainty surrounding assumptions because there are variable results. Which one is it? It is either variable owing to project-specific



factors, or consistent across the board (your measure of ‘certainty’). It can’t be both. It is widely acknowledged that KPTs provide the most accurate picture of actual fuel usage at the household level in both the pre- and post-project scenarios, and therefore mitigate the variables and uncertainties you identify in WBTs.

- 6) In Box 24 on page 55, the HAP performance of stoves is discussed.
 - a. We are not sure how this links to a rating for GHG emissions reductions? If you are rating for health impacts, then this could/should be considered, but this is a GHG emissions rating. If you include HAP, then this should positively impact your rating as well as negatively, as appropriate.
 - b. Furthermore, the analysis does not cover all stove models (understandably so) but most of the devices used in projects are tested for emissions, thermal efficiencies etc. by an independent 3rd party already. The PD can be asked to share these test reports with BZC when the rating process begins which can be taken into consideration when assessing this parameter.
 - c. You say data comes from “International Workshop Agreement” with no reference; where is this data from?
 - d. You go on to say “We find that some ICSs have a low performance when reducing HAP, which may suggest an overestimation of actual reductions.” How do you correlate performance on HAP with emissions reductions? Of course the higher the efficiency of the stove, the higher the HAP reduction, but where does this fit into the rating of ICS projects? Unless a project is seeking to credit ‘black carbon’ as an emissions reduction, which most are not, then this is not relevant.
 - e. Where is your evidence that suggests: “HAP may increase even when using ICS”?
- 7) In the “sample size” section on page 55, BZC mentions “an appropriate sample size and a representative population” is suggested for more efficient monitoring and projects using the minimum sample size are criticized. However, if statistical precision and confidence levels are achieved with the respective sample outlined in a methodology, then the sample is representative of the entire population regardless of the sample size. This is applicable in all scientific studies, not just for carbon projects, so what is your objection here?
- 8) Your argument on stove usage is extremely weak and demonstrates a fundamental lack of understanding of project-specific conditions. Where independent auditors have conducted site visits to assess usage rates there is considerably more assurance around usage data than using non-project-specific literature. You fail to acknowledge that usage can and does increase over time as developers employ outreach programmes to encourage usage – indeed developers are incentivized to do this.
- 9) Your section on Stove Stacking fails to identify how paired KPTs negate this risk by isolating the fuel use in question (i.e. biomass) and comparing the pre- and post-project scenarios. If other stoves exist and if they are being used it will be demonstrable in the baseline and project KPT data. Equally where baseline stoves continue to be used in the project scenario, this is always captured in KPT/habit survey data. Referring to published literature is considerably less accurate than reviewing independently



verified, project-level data. Therefore, KPT results and other monitoring results such as the usage rate and stove stacking should all be considered when analyzing the project as a whole.

- 10) In Box 30 on page 65, an ICS project in Kenya is discussed and the reduction in fuel use over the three monitoring periods is criticized. However, even if the stove does marginally decrease in efficiency over time, this does not necessarily mean that the fuel usage will increase. If the PD shows that increased community engagements and monitoring activities were done to improve stove usage and uptake, will this be taken into consideration? In some cases, it has been seen that the fuel usage decreases over time as stove beneficiaries get more accustomed to using the device and use it more efficiently. It is to be expected that the adoption rate of stoves increases over time.
- 11) The acronym “NBS” is only explained as being “nature-based solutions” on page 71 but is used as an acronym earlier on in the methodology and is not on the acronym list.
- 12) You discuss leakage from ‘other cookstove uses’:
 - a. This fails to recognize that KPTs assess any other usage as they measure fuel use at the household level, not just on the ICS. Applying KPTs negates any leakage from other cookstove usage.
 - b. This also applies to the “Jevons paradox” which is equally covered by KPT assessments at the household level.
 - c. Additionally, projects can evaluate potential leakage sources during the baseline survey (e.g., if the baseline stoves are used for heating) or monitoring survey/s. The results can be used to justify the default leakage discount as a conservative approach.
- 13) With regards to “Reversal Risk” on page 77, household device methodologies do not account for carbon stocks in forests. Instead, they focus on reducing emissions from biomass combustion. The emissions reduction credits (ERs) generated during fuel combustion are not reversible. The potential impact of “Members of the population who do not participate in the project, and previously used lower emitting energy sources, instead use the nonrenewable biomass or fossil fuels saved under the project activity” is accounted for within the project leakage assessment.
- 14) The section about end-user household locations on page 77 states that it's rare for projects to disclose the exact locations of households. This information is, however, available for many of the newer projects which collect the GPS location of each monitored end-user and also include GPS locations in their end-user databases. It is to be noted that the GPS locations and the full name of the end-users might not be disclosed within the publicly available documents for privacy issues but are always shared with the independent auditors.
- 15) With regards to “Sustainable Development Goals” section on page 83, there has been standardization work done for monitoring, reporting and verification of the SDG’s (other than SDG13). For example, the GS SDG tool which has been available since 2021.



16) With regards to the “Risk Factor Weighting” on page 85, some more clarity on the rating and how it relates to the final “score” would be useful. How does the rating scale relate to the risk factor weighting scale and how exactly are each of the sectors scored?

✓ Will be available on pd-forum.net

