SUMMARY OF PUBLIC CONSULTATION

VMR0006 Energy Efficiency and Fuel Switch Measures in Thermal Applications, v1.2

A draft of the revised methodology *VMR0006 Energy Efficiency and Fuel Switch Measures in Thermal Applications, v1.2* was open for public consultation between 28 March 2023 and 27 April 2023. This document includes a list of each comment received and Verra's response.

SPECIFIC COMMENTS

Section 1 - Sources

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#	Organization	Comment	Verra's Response
1	C-Quest Capital	Methodology requires use of latest version of AMS II.G. This could pose issues for projects under various stages of development. There could be a case where a project which is in technical review phase has to redo the entire exercise owing to change in version of AMS II.G. **Proposed Changes:** We propose that instead of stating "latest version" of AMS II.G, it should state "valid version" of AMS II.G. since there is a buffer period between change of versions. Also, PP should be allowed to continue with the version of methodology (VMR as well as AMS II.G) which was applied at the time of project listing.	Verra methodologies in general use the "latest version" of CDM tools and methodologies to follow best practice. The grace period for validating projects listed on the pipeline is applied as per the VCS Standard.
2	C-Quest Capital	The proposed change requires use of latest version of CDM tools.	Revisions of methodologies from approved GHG programs are based on the underlying methodology. The latest versions must be applied in conjunction with the

Section 1 - Sources			
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		Proposed Changes: Current version of tool which is applicable at the time of VMR0006 revision should be fixed as the version to be used under this methodology.	revision to ensure the latest science and development is reflected.

Section 2 – Summary Description of the Methodology

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3	C-Quest Capital	Applicability criterion states that "Project stoves to be implemented shall must have a specified high power thermal efficiency of at least 25%." **Proposed Changes:** It is recommended that the methodology be applicable to project cookstoves with rated thermal efficiency of at least 30 percent, to be consistent with the UN's proposed changes to AMS II.G under Article 6.4 Mechanism [A6.4-SB004-AA-A10, Draft Recommendation: Requirements for the development and assessment of mechanism methodologies]	The requirement for stove efficiencies was aligned with the underlying CDM methodology (AMS-II.G) in the updated version. The device thermal efficiency threshold will remain at 25% for now. We will consider further revisions to this in the new consolidated methodology that is currently under development.

Section 4 – Applicability Conditions

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#	Organization	Comment	Verra's Response
4	C-Quest Capital	Applicability criterion 1 states "Project activities must	The full scope of the methodology is now mentioned in

Section 4 – Applicability Conditions			
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		introduce efficiency improvements in thermal application of non-renewable biomass". This indicates non-applicability of fuel switch projects. However, the very next applicability criteria talks of projects undertaking switch from fossil fuel to renewable biomass. **Proposed Changes:** The applicability criteria should be re-framed to allow efficiency improvement as well as fuel switch (fossil fuel to renewable biomass as well as non-renewable biomass to renewable biomass).	the applicability conditions section which describes both the energy efficiency improvements and fuel switch projects.

Section 7 - Additionality

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#	Organization	Comment	Verra's Response
5	CCQI	Per the Carbon Credit Quality Initiative assessment of cookstove additionality: There is a high likelihood that the values commonly used for f_{NRB} leads to overestimation of emissions reductions under the AMS.II.G methodology. When the CDM Tool 30 was introduced in 2017, it included a conservative default value of 30% based on the work of Bailis et al. (2015) and was therefore in the middle of the range of 27-34% from that peer-reviewed study. At a global level, the f_{NRB} is estimated by the 4th assessment of the Intergovernmental Panel on Climate Change (IPCC) to be 10%. Bailis et al. (2015) estimated country specific values between 27% and 34%, and Miranda et al. (2013) between 20% to 30%. By contrast, the median	"Regarding the proposed change (which seems unrelated to the comment): The positive list is established based on the revenue stream option. If no revenues are generated from the distribution of thermal energy generation units (other than the sale of carbon credits), the projects are additional. This requirement is not location-specific. We have updated the approach for fnrb in version 1.2 to address uncertainty. Project must either apply 30% for fnrb as per TOOL30, or apply a discount factor of 26% for emission reductions to account for uncertainty when calculating fnrb based on TOOL33. The approach may be further revised for the new

Section 7 - Additionality			
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		f_{NRB} used by 305 carbon market projects in 45 countries, as surveyed by Bailis et al. (2015) was 90%. **Proposed Changes:** The positive list activity method approach is not broadly appropriate for cookstove projects in urban areas. Therefore, it is recommended that that VMR0006 should be limited in eligibility to cookstove projects in rural areas.	consolidated methodology under development."
6	C-Quest Capital	Positive list should include projects which distribute stoves at highly subsidized rates in addition to free dissemination. **Proposed Changes:** Projects which are undertaking heavily subsidized stove distribution and which have no other sources of income other than carbon credits should also be allowed to use auto additionality provided proof of subsidy can be presented.	The positive list is based on the revenue stream option for projects that distribute the stoves at zero cost and are not part of a governmental scheme or multilateral funding. For projects under different conditions, the additionality tool must be applied.

Section 8 – Quantification of GHG Emission Reductions and Removals

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7	UpEnergy	As per the methodology VMR0006 ver 1.1, the parameter "$B_{y,savings,i,j}$" which is part of equation (2) in page 10, has to be calculated based on either equation (3) or equation (4). Both the equations (3 and 4) have the parameter $\eta_{new,i,y}$, which has to be determined through WBT in the project scenario. **Proposed Changes:** UpEnergy would like to propose,	All options of the CDM methodology can be used under the final version 1.2 of VMR0006. The methodology revision refers to the CDM methodology for using different options.

Section 8 – Quantification of GHG Emission Reductions and Removals			
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		inline with AMS-II.G ver 13, para 31 equation (6), the parameter "$B_{y,savings,i,j}$" to be determined through KPT as well, as one of the options. Hence, $B_{y,savings,i,j}$ can be calculated as follows: $B_{y,savings,i,j} = B_{old,i,j} - B_{new,KPT,i,j}$. As indicated above, this approach is inline with the latest version of AMS-II.G ver13 and UpEnergy requests VERRA to include the KPT approach in the methodology VMR0006.	
8	CCQI	The original AMS-II.G. methodology provides four options for the quantification of woody biomass saved. VMR0006 appears to eliminate this flexibility, and instead prescribes the water boiling test (WBT). While it's not clear whether the inherent uncertainty of this parameter leads to systematic under or overestimation, please note that the accuracy of the WBT method has been called into question by Abeliotis & Pakula (2013), who found that stove performance does not necessarily translate to cooking actual meals in households (Source 13), and by Berrueta et al. (2008), who evaluated the performance of a stove designed primarily for tortilla-making by using all three tests and found that the WBT "gave little indication of the overall performance of the stove in rural communities" (Source 16). Furthermore, Cames et al. (2016) indicate that evidence suggests the Water Boiling Test (WBT) is not an appropriate tool and should be removed from the CDM methodology (Source 5). **Proposed Changes:** Eliminate the water boiling test and provide more reliable test methods to determine the efficiency.	All options of the CDM methodology can be used under the final version 1.2 of VMR0006. The methodology revision refers to the CDM methodology for using different options.

Section 8 – Quantification of GHG Emission Reductions and Removals			
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9	CCQI	Historically, it seems likely that the woody biomass consumption is over-estimated in many projects. Given that the average values reported in PDDs are 50-75% higher than the previous default value of .5 tons per person per year (which is meant to be a typical value not a conservative one), the level of overestimation could be significant for many projects. **Proposed Changes:** Consider these potential options to reduce overestimation of the quantity of firewood consumed in the absence of the project activity: 1. Mandate the use of the most recent default value in AMS-II.G (Tool 33). 2. Provide further guidance in the methodology how to determine project-specific values in order to avoid risks that too high values are being determined.	The updated version uses the procedure of AMS-II-G. Further guidance and revisions will be considered for the new consolidated methodology.
10	C-Quest Capital	Leakage- The leakage parameter has been introduced in equation 1 and removed from equation 2, however on page 13, it is mentioned that "in order to address the potential source of leakage.....requirements of latest version of AMS II G must be followed or a net to gross adjustment factor of 0.95 must be applied to ERy". AMS II. G. requirement on the other hand mentions applying a net to gross adjustment factor on Bysavings. **Proposed Changes:** There should be consistency in application of leakage factor. Moreover there should be clarity on not subtracting this parameter from equation 1, if PP has opted for default leakage value to be applied to By,saving.	The leakage quantification has been revised.
11	C-Quest Capital	Applying a default schedule of linear decrease in	This has been aligned with the CDM methodology. To

Section 8 – Quantification of GHG Emission Reductions and Removals			
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		efficiency of 20% up to the terminal efficiency assumed as 20 per cent through the span of the life span of the project device". The threshold efficiency applicable under this methodology is 25%, hence linear decrease in efficiency upto 20% will lead to stoves not being applicable under the methodology by the time they reach end of their life. **Proposed Changes:** The decrease should be considered until terminal efficiency of 25% for calculating linear decrease of 30% if Verra adopts the 30% minimum thermal efficiency threshold.	clarify, the 25% efficiency threshold is for new stoves only. This means that the stove may start at >25% with a declining efficiency to 20% over its operational lifetime.
12	C-Quest Capital	AMS II.G. has provision for determining By,savings using other methods such as kitchen performance test, controlled cooking test etc. when this methodology relies on AMS II.G for majority of its requirements, then why restriction on using only WBT as an option of determining By,savings **Proposed Changes:** the methodology should include other methods such as KPT, CCT and thermal energy output as means of determining By,savings	All options of the CDM methodology can be used under the updated version 1.2 of VMR0006. The methodology revision refers to the CDM methodology for using different options.
13	C-Quest Capital	The methodology should include provision for inclusion of projects which replace charcoal stoves with renewable biomass stoves. **Proposed Changes:** Equations required for estimating emission reduction from such projects should be included in section 8.4. Reference uof CDM methodology AMS I.E can be used.	This will be further considered in the consolidated methodology under development.
14	EKI Energy Services	under the justification of the parameter Nnew,i,y the linear reduction in efficiency is mentioned as 20	This has been aligned with the CDM methodology. To clarify, the 25% efficiency threshold is for new stoves

Section 8 – Quantification of GHG Emission Reductions and Removals			
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	Limited	percent. **Proposed Changes:** but the threshold efficiency for the project stove is 25%	only. This means that the stove may start at >25% with a declining efficiency to 20% over its operational lifetime.
15	BeZero Carbon	The data input which underlies the default annual consumption of woody biomass were not publicly available. The lack of transparency causes uncertainties regarding default values. **Proposed Changes:** We advocate for clarity regarding the data and/or methodologies which are applied to the values used by the project. This would include transparent and standardised reporting around any variations (or lack of) regarding climatic conditions or demographic characteristics.	The source of the default data for the annual consumption of woody biomass is CDM concept note CDM-MP88-A19 and CDM Tool 33. Relevant data for all ex-ante and ex-post parameters is reported in the project descriptions and monitoring reports respectively. Further information on the values included can be found in the CDM concept note: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20220713221018839/MP88_EA19_CN_Cookstove%20default%20values.pdf
16	BeZero Carbon	Project stove efficiency may differ between a laboratory environment and local cooking conditions. **Proposed Changes:** We recommend that projects explicitly document and make publicly available how project stove efficiency tests capture local climatic cooking conditions, what sample sizes were used, and where the tests were conducted. We also encourage projects to document clearly the monitoring of decreases in stove efficiency over time.	The updated version uses the approach from the underlying CDM methodology. Reporting requirements are given for validation and verifications (including project descriptions and monitoring reports). This will be further considered in the consolidated methodology under development.

Section 9 - Monitoring

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17	CCQI	Per the Carbon Credit Quality Initiative assessment of AMS.II.G (https://carboncreditquality.org/download/Assessments/1.3.2%20CDM%20AMS%20II.G%20%2831%20May%202022%29.pdf): There is a high likelihood that the values commonly used for fNRB leads to overestimation of emissions reductions under the AMS.II.G methodology. When the CDM Tool 30 was introduced in 2017, it included a conservative default value of 30% based on the work of Bailis et al. (2015) and was therefore in the middle of the range of 27-34% from that peer-reviewed study. At a global level, the fNRB is estimated by the 4th assessment of the Intergovernmental Panel on Climate Change (IPCC) to be 10%. Bailis et al. (2015) estimated country specific values between 27% and 34%, and Miranda et al. (2013) between 20% to 30%. By contrast, the median fNRB used by 305 carbon market projects in 45 countries, as surveyed by Bailis et al. (2015) was 90%. **Proposed Changes:** Make it mandatory for project developers to use regionally disaggregated default values based on peer-reviewed data.	We have updated the approach for fnrb in version 1.2 to address uncertainty. Project must either apply 30% for fnrb as per TOOL30, or apply a discount factor of 26% for emission reductions to account for uncertainty when calculating fnrb based on TOOL33. The approach may be further revised for the new consolidated methodology under development.
18	CCQI	Description states that the fNRB parameter represents the efficiency of the project stove at the start of the project activity, where in fact the parameter represents the fraction of woody biomass that can be established as non-renewable. **Proposed Changes:** Change the description to original description in the AMS-II.G methodology.	The description of the parameter has been corrected in the updated version of the methodology.

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19	CCQI	The revision of the charcoal conversion factor from 6 to 4 kg of fuelwood per kg of charcoal is an improvement on the existing methodology. **Proposed Changes:** Due to the considerable uncertainty with respect to the appropriateness of the wood to charcoal conversion factor, adopting the updated value from CDM of 4 kg of fuelwood per kg of charcoal is a prudent decision. We recommend using a standardized approach and prescribe this value, given the considerable uncertainty in any values determined under project-specific conditions observed with existing projects.	Thanks for your comment.
20	C-Quest Capital	B old- charcoal to wood conversion factor if based on current version of tool may lead to confusion if the version changes midway during registration process. **Proposed Changes:** Version of tool for reference of charcoal to wood conversion factor should be fixed to the one that is applicable at the time of VMR0006 current revision	The methodology will promote the application of the latest versions of the CDM tools to have projects incorporate the latest (scientific) understanding and other developments.
21	C-Quest Capital	fNRB- option for using fNRB values endorsed by host country government or relevant authority under the government should be included. **Proposed Changes:** One more option for determining fNRB should be included.	The updated version uses the approach of the underlying CDM methodology. Further revisions will be considered for the consolidated methodology under development.
22	C-Quest Capital	fNRB- Description of parameter is not correct **Proposed Changes:** Should be changed to correct description	The description of the parameter has been corrected in the updated version of the methodology.

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23	C-Quest Capital	hp- clarity on use of this parameter specially since equation where it was used is no longer included in the methodology **Proposed Changes:** Should be removed if not used in any equation	This parameter has been removed in the update version of the methodology.
24	EKI Energy Services Limited	description of fNRB is mentioned as "Efficiency of project stove at the start of project activity" that is incorrect. **Proposed Changes:**	The description of the parameter has been corrected in the updated version of the methodology.
25	BeZero Carbon	BeZero acknowledges that the wood-to-charcoal default conversion factor is in line with the most recent IPCC Guidelines for National Greenhouse Gas Inventories. The underlying data and/or literature which drives the default factor has not been shared publicly in the methodology. **Proposed Changes:** BeZero encourages projects to demonstrate how regional and/or local conditions may impact the wood-to-charcoal conversion factor in the project area, given geographic variations can arise. Further, the methodology should state publicly the data/literature behind the default value for the purpose of transparent accounting.	The updated version uses the approach and default values from the underlying CDM methodology (AMS-II.G) and CDM Tool 33. Further revisions will be considered for the consolidated methodology under development. Further information on the values included can be found in the CDM concept note: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20220713221018839/MP88_EA19_CN_Cookstove%20default%20values.pdf
26	CO2Balance	Section V of parameter $N_{new,i,j}$ (Efficiency of the device of each type i and batch j implemented as part of the project activity): The "default schedule of linear decrease in efficiency up to the terminal efficiency assumed as 20 per cent through the life span of the project device" should apply to wood ICS, and a	This cannot be addressed as part of this minor revision. This may be considered for the new consolidated methodology for improved thermal energy generation units that is under development.

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		different assumption should be made for charcoal ICS. A default value of 0.25 is applied to baseline charcoal stoves. If the linear default of 0.20 is applied to a charcoal ICS then there will be no saving and charcoal ICS will not be feasible under this methodology. Charcoal ICS are more efficient that wood ICS and the methodology should reflect this, and allow PDs implementing charcoal ICS to also apply a linear thermal efficiency. Based on the pattern of wood ICS efficiency (0.15 baseline, 0.20 project, the charcoal project assumption should be 0.30 (baseline 0.25, project 0.30). **Proposed Changes:** Section V of parameter $N_{new,i,j}$ (Efficiency of the device of each type i and batch j implemented as part of the project activity) should allow an assumption of 0.30 for charcoal ICS.	
27	C-Quest Capital	$h_{new,i,j}$ - linear decrease in efficiency up to 20% **Proposed Changes:** should be corrected to 25% or 30% if Verra adopts this as the minimum thermal efficiency threshold.	This has been aligned with the CDM methodology. To clarify, the 25% efficiency threshold is for new stoves only. This means that the stove may start at >25% with a declining efficiency to 20% over its operational lifetime.
28	C-Quest Capital	$h_{new,i,j}$ - currently just allows WBT test and default linear decrease. Should include all options in line with AMS II.G. **Proposed Changes:** Should be aligned with options available in AMS II.G	All options of the CDM methodology can be used under the final version 1.2 of VMR0006. The methodology revision refers to the CDM methodology for using different options.
29	C-Quest Capital	Life span- the methodology should have special provision for assessing lifespan of fixed brick mud stoves since these can be operational for several years owing to continued application of lays of mud to	This will be further considered in the consolidated methodology under development.

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		maintain it. **Proposed Changes:** there should be provision for assessing life of such stoves based on their present condition.	
30	EKI Energy Services Limited	under "Description of measurement methods and procedures to be applied" of the parameter $N_{new,i,y}$, the linear reduction in efficiency is mentioned as 20 percent **Proposed Changes:** but the threshold efficiency for the project stove is 25%.	This has been aligned with the CDM methodology. To clarify, the 25% efficiency threshold is for new stoves only. This means that the stove may start at >25% with a declining efficiency to 20% over its operational lifetime.
31	BeZero Carbon	BeZero acknowledges the adjustment of the baseline stove efficiency. The data and/or literature which drives the default values were not stated and/or linked in the methodology and is not publicly accessible. **Proposed Changes:** BeZero recommends that projects provide the data and/or literature which drives baseline stove efficiencies publicly, in order to acknowledge local and regional variation in stoves and cooking conditions. We also propose that the monitoring and sampling techniques of baseline devices are clearly reported in project documents. We also recommend transparency around how projects approach any associated uncertainties and potential changes in baseline efficiencies over time.	The updated version uses the approach and default values from the underlying CDM methodology (AMS-II.G) and CDM Tool 33. Further revisions will be considered for the consolidated methodology under development. Further information on the values included can be found in the CDM concept note: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20220713221018839/MP88_EA19_CN_Cookstove%20default%20values.pdf
32	Project Developer Forum	Where charcoal is used by baseline devices, a default wood to charcoal conversion factor of 4 kg of firewood per kg of charcoal may must be used in line with paragraph 35 of AMS II.G, version 11, the latest version	The updated version uses the approach from the underlying CDM methodology. Further revisions to this will be considered for the new consolidated methodology under development.

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		of CDM TOOL 33.' **Proposed Changes:** It would be useful to explicitly allow for alternatives such as test-based or country/region specific baseline values, as in AMS-II.G.	
33	Project Developer Forum	Section V of parameter $\eta_{new,i,j}$ (Efficiency of the device of each type i and batch j implemented as part of the project activity): The "default schedule of linear decrease in efficiency up to the terminal efficiency assumed as 20 per cent through the life span of the project device" should apply to wood ICS, and a different assumption should be made for charcoal ICS. A default value of 0.25 is applied to baseline charcoal stoves. If the linear default of 0.20 is applied to a charcoal ICS then there will be no saving and charcoal ICS will not be feasible under this methodology. Charcoal ICS are more efficient that wood ICS and the methodology should reflect this, and allow PDs implementing charcoal ICS to also apply a linear thermal efficiency. Based on the pattern of wood ICS efficiency (0.15 baseline, 0.20 project, the charcoal project assumption should be 0.30 (baseline 0.25, project 0.30). **Proposed Changes:** Section V of parameter $N_{new,i,j}$ (Efficiency of the device of each type i and batch j implemented as part of the project activity) should allow an assumption of 0.30 for charcoal ICS.	Revisions to charcoal stove efficiencies will be considered for the new consolidated methodology under development.
34	Eni SpA	We suggest to define baseline device efficiency with sample and WBT on-field. On this regard, the methodology specify that the developer may "use the simplified guidelines stated under Option (b) in Section 8.4 above for arriving at the minimum sample size",	The updated version uses the approach of the underlying CDM methodology.

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		which would require to have a minimum sample size of 100 with a target population > 1000. This sample size is feasible if the field activities are questionnaires on cooking devices currently adopted (in accordance with AMS-II.G), but it is not a reasonable target if the project proponent intends to conduct WBT for a more robust outputs on baseline devices. In our view, the optimal approach to identify the thermal efficiency of baseline devices would be to follow one of the option currently applied in the procedure valid for determine the thermal efficiency of project stoves: per each kind of baseline device identified in the project area (three stone fire with wood/charcoal and/or charcoal rudimental stoves), we would conduct WBT n.3 test per device, identifying n.3 baseline devices per each cooking method (n.9 WBT overall per cooking method), considering it as acceptable if the 90/10 precision requirement is met. **Proposed Changes:** The point (f) definition ("If this parameter is surveyed, project promoters may use simplified guidelines stated under Option (b) in Section 8.4 above for arriving at the minimum sample size") could be integrated and better qualified as follow: "If this parameter is surveyed through questionnaires, project promoters may use simplified guidelines stated under Option (b) in Section 8.4 above for arriving at the minimum sample size. Whereas, in case project proponent decides to perform WBT to determine the efficiency of baseline stoves, WBT tests shall be implemented identifying n.3 baseline devices per each baseline cooking device used in the project area (three stone fire with wood; charcoal rudimental stove; others), implementing n.3 tests per device (n.9 WBT	

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		overall per cooking method). The test can be carried out by project proponents or other third parties."	
35	Eni SpA	A default factor of 0.25 applied to any kind of baseline devices using charcoal does not represent the on-field baseline situation, and it would phase out the development of improved cookstoves distribution projects using charcoal devices. A charcoal baseline device compliant with description in point c), "a conventional device with no improved combustion air supply or flue gas ventilation, that is without a grate or a chimney", shall be eligible to apply a default value of thermal efficiency of 0.15. **Proposed Changes:** Use a definition equal to CDM TOOL33, removing the specific reference to "charcoal" when talking about the default value of 0.25, which should be more generally valid for "other type of devices" not compliant with the definition of "a conventional device with no improved combustion air supply or flue gas ventilation, that is without a grate or a chimney."	This will be further considered in the consolidated methodology under development.

General Feedback

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36		While the default value has since been revised down to .4, this will not mitigate the risk of overestimation because only around 1% of monitoring reports for CDM	This will be further considered in the consolidated methodology under development.

General Feedback			
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		cookstove projects reviewed by the UNFCCC Secretariat for the Methodologies Panel used the default value. The rest were calculated with the 2nd and 3rd options: 64% calculated the figure from primary data and 34% from secondary data based on literature. Average calculated values under these methods were .75 for Asia and Sub-Saharan Africa, .83 for the Middle East and North Africa, and 1.34 for Latin America – all well above the default value.	
37		While it is possible that cookstove projects registered under carbon crediting programs could be implemented in geographical areas with higher fNRB values, it appears unlikely that the true (unknown) values for fNRB are significantly higher in these projects than the values from the literature. Projects registered under carbon crediting programs have been implemented in many different regions, including deforestation hotspots but also areas where the literature suggests that the values fNRB are much lower than the values used by registered projects.	We have updated the approach for fnrb in version 1.2 to address uncertainty. Project must either apply 30% for fnrb as per TOOL30, or apply a discount factor of 26% for emission reductions to account for uncertainty when calculating fnrb based on TOOL33. The approach may be further revised for the new consolidated methodology under development.
38		Determining reliable fNRB values is challenging, in particular as these values depend on assumptions that are difficult to verify by auditors. We therefore believe that regionally highly disaggregated values should be used in the methodology, rather than determining project-specific values. Such a standardized approach ensures integrity and also addresses selection bias if project developers can pick and choose between own values and default values.	We have updated the approach for fnrb in version 1.2 to address uncertainty. Project must either apply 30% for fnrb as per TOOL30, or apply a discount factor of 26% for emission reductions to account for uncertainty when calculating fnrb based on TOOL33. The approach may be further revised for the new consolidated methodology under development.
39		The previous value of 6, derived from the Revised 1996 IPCC Guidelines, did not take into account that the same	The updated version aligns with the requirements of AMS-II.G which prescribes a default conversion factor of

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		IPCC source stated that conversion factors in many developing countries "would range from 2.5 to 3.5 and rarely beyond this". Given that CDM is applied in developing countries, the methodology does not refer correctly to the 1996 Revised IPCC Guidelines. If the range of 2.5 to 3.5 would be realistic today, using the previous default conversion factor of 6 would lead to an overestimation of emissions reductions by a factor of two.	4.
40		In 2022, the Methodologies Panel of the CDM conducted a literature review and concluded that a value of 4 represents the lower end of the range indicated in most literature reviewed. Indeed, the available literature often indicates higher values, depending on the kiln type and moisture content.	Thanks for your comment.