

ECO_A_BURN multi-country Clean Cooking Programme (GS10789)

Design Consultation Review under Gold Standard for the Global Goals

This document summarizes the results of GS4GG Design Consultation Review:

- Where present, Clarification/Corrective Action Requests are summarised in the **Comment/Request boxes** found beneath the Project Summary Information. These require a satisfactory explanatory response from the GS-VVB, or the Project Developer, before the Design Consultation can be approved.
- Where present, Forward Action Requests are summarized in the **table immediately below**. These must be resolved during Validation/Verification or Design/Performance Review, as applicable.

Summary of Forward Action Requests (FARs):	
FAR # 1:	
FAR # 2:	
FAR # 3:	
FAR # n:	

Review Feedback Round:	1 st <input type="checkbox"/> 2 nd <input checked="" type="checkbox"/> 3 rd <input type="checkbox"/> 4 th <input type="checkbox"/> 5 th <input type="checkbox"/> 6 th <input type="checkbox"/> 7 th <input type="checkbox"/>
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Program summary	
Project Type:	Energy Efficiency-Domestic
Project Size:	Large scale
Project Location:	Benin, Burkina Faso, Democratic Republic of the Congo, Côte d'Ivoire, Ethiopia, Ghana, Guinea, Kenya, Liberia, Madagascar, Mozambique, Nigeria, Rwanda, Senegal, Sierra Leone, Somalia, Tanzania, United Republic of Togo, Uganda, Zambia, Malawi, Cameroon
PoA Start Date:	30/06/2020
Regular/Retroactive	Retroactive
Date of PoA Design Consultation:	19/05/2020
Program details: The Programme of Activities (PoA) 'ECO_A_BURN multi-country Clean Cooking Programme' will deploy efficient improved cookstoves reducing woody biomass consumption for households, institutions and Small and Medium Enterprises (SMEs) across different countries in Africa. The PoA may opt later on to include technologies and/or practices that displace nonrenewable by renewable fuels or for the introduction of safe water supply and treatment technologies. The Coordinating and Managing Entity (CME) of the PoA is 'BURN Manufacturing Co.' (in the following 'BURN'), a US based company. The proposed project activities under the PoA will be implemented by 'BURN' or any other project implementing partners. The first project activities under the PoA will distribute highly efficient improved firewood and/or charcoal stoves to households in Somalia and Kenya.	

Document (s) provided and reviewed (1 round):

- PoA Design Consultation Report (20200630_GS4GG_PoA_Design-Consultation_BURN_multi-country PoA.pdf)
- Other supporting evidence and documentation:
 - *Non-Technical Summary_ECO_A_BURN_English_Portuguese_French.pdf*
 - *Re Invitation pour Gold Standard PoA Design Consultation ECOABURN multicountry Clean Cooking Programme_Email with feedback form_Almighty.pdf*

- *NGO Tandavanala Feedback_ECOA BURN multi-country PoA_NGO Tandavanala.pdf*
- *Feedback form_ECOA BURN multi-country PoA_feedback form_Almighty.pdf*
- *Feedback form_ECOA BURN multi-country PoA_Feedback CO2logic.pdf*
- *Feedback form_ECOA BURN multi-country PoA_DNA Mozambique.pdf*
- *Re Invitation pour Gold Standard PoA Design Consultation ECOABURN multicountry Clean Cooking Programme_Femmes Solidaires comments.pdf*
- *Re Convite para Gold Standard PoA Design Consultation ECOABURN multicountry Clean Cooking Programme_PRODEA_comments.pdf*
- *Queries Gold Standard PoA Design Consultation_Comments Easy Solar.pdf*
- *Fwd REMINDER Invitation for Gold Standard PoA Design Consultation ECOABURN multicountry Clean Cooking Programme_HIVOS comments.pdf*

Document (s) provided and reviewed (II round):

- *202000903_GS4GG_PoA_Design-Consultation_BURN_multi-country PoA_clean.pdf*
- *20200630_PoA-DD_ECOA_BURN multi-country Clean Cooking Programme_ver1.0.pdf*

Review Results: Please respond to the following comments and/or requests for additional information

SECTION A:
PoA Design consultation report
<p>1. A.1:</p> <ul style="list-style-type: none"> • The PP shall provide the GS ID of PoA together with its title. • The provided link (http://www.who.int/mediacentre/factsheets/fs292/en/) does not support to the PP's statement that "In most of the countries on the African continent cooking is done on either 3-stone fires or very inefficient traditional cookstoves, consuming a lot of fuel, in particular nonrenewable firewood and charcoal". Please clarify and submit the correct supporting evidence. <p>2. A.3: According to GS4GG definition, the PoA start date for a Gold Standard voluntary PoA is the date when the PoA Design Consultation Report is submitted for Gold Standard Review. This event is the time of first submission of the PoA instead of the starting date of first VPA. Please correct.</p> <p>3. A.3: According to the GS4GG PoA requirement, page 4, version 1.2: "Under no circumstances, the VPA/CPA crediting period start date can be earlier than the PoA crediting period start date", the CME shall clarify how the VPA1 with start date of 01/07/2019 could be eligible to be included in the PoA.</p> <p>4. A.4:</p> <ul style="list-style-type: none"> • Please check the reference "see Principles & Requirements, 4 (a) 4.1.3" as the section 4.1.3 does not regulate the Type of project. The PP shall note that the updated GS4GG Programme of Activity Requirements was released and in forced since Oct 2019. The PP shall conduct the assessment base on the updated eligibility criteria. • Double counting: the PP shall clarify how they ensure that the ICS under the PoA will not be counted under another carbon project or double counted among the different VPAs of this proposed PoA. • Project scale: The PP is requested to clearly define the Project scale (Large, small or micro-scale) <p>The PP shall update and resubmit the updated documents in track-change mode.</p>
Response by CME (round 1)
<p>1. -GS ID of PoA has been added in the PoA Design Consultation Report -The link in footnote 1 has been updated accordingly.</p> <p>2. Following the logic, the PoA start date <u>cannot</u> be <u>after</u> the start date of the VPA. Since the PoA is the general framework for all VPA activities. Since the first VPA is retroactive and the start date is 01/07/2019, it has been considered as PoA start date, too. Hence, no amendment is necessary.</p> <p>3. GS4GG PoA requirements, 3.1.2, mention that the 'the PoA crediting period start date is the crediting period start date of the earliest VPA/CPA included in the PoA'. The start date of the crediting period of the earliest VPA (GS10790) is 02/07/2019, consequently the PoA crediting period start date is 02/07/2019 too. As per GS4GG requirements, a retroactive project start date of a VPA is possible up to a maximum of 1 year prior to submission for preliminary review. Crediting is possible retroactively for a maximum of 2 years prior to Design Certification. The CME follows/will follow both requirements.</p> <p>4. -The CME had conducted its assessment on the most recent available principles & requirements. Please note, that the reference to 4 (a) 4.1.3. in this context is correct since it refers to 'eligible project types' and the associated community services activity requirements. Hence, there is no need for any correction. -In regard to avoidance of double counting of project activities, an inclusion criterion requires each of the VPAs to be checked on whether it is registered as a separate GS project activity and neither included as part of another registered GS (or other carbon standard) PoA nor that the project activity has been deregistered. Carbon registries will be checked accordingly. In terms of avoidance of double counting of emission reductions, another inclusion criterion requires an unique identification system, i.e. each of the cookstove devices will have an unique serial number. The details are provided in the PoA-DD and VPA-DDs as well had been already provided under section C.2 of the PoA Design Consultation Report. Hence no modification in the PoA Design Consultation Report is necessary.</p>

-The project scale is large and had been mentioned in the VPA-DDs before. Though it had been mentioned in the PoA Design Consultation Report (A.4.) that 'there will be no aggregated micro-scale or small-scale threshold', it has still been added that the VPAs will be of large scale.

Response by SustainCERT (round 2)

1. **The Comment/Request is closed.**
2. **The Comment/Request is closed.**
3. **The Comment/Request is closed.**
4. **The Comment/Request is closed.**

SECTION B:

1. As the project is developed under Voluntary carbon mechanism, the PP shall use the term "VPA" instead of "CPA" consistently within the project document.
2. The CME shall clarify that besides English, French and Portuguese language if the non-technical summary of the PoA is written in local language to ensure that the programme information has been spread to as many stakeholders as possible and obtain relevant constructive feedback on the various aspects of the PoA. The original text of the non-technical summary shall be submitted.
3. The PP shall note that a single stakeholder physical meeting can be organized for several VPA(s) as long as convincing justification is provided and approved by Gold Standard, e.g. the activities are close enough to each other in location and time (start of construction/implementation within the same 2 years), similar socio-economic situations, identical activity or technology, etc. This approach shall be approved at the time of listing the VPA i.e. submission of activity level stakeholder consultation report.

Response by CME (round 1)

1. The term VPA is now consistently used within the project document. PoA Design Consultation Report has been corrected accordingly.
2. The original text of the NTS had been already mentioned in section B.2 of the PoA Design Consultation Report. Besides, the document 'Other Document 10 (Non-Technical Summary_ECOA_BURN_English_Portuguese_French.pdf)' had been uploaded to the SustainCert registry. Hence no further submission of any document is necessary. The NTS was submitted in the three languages English, French and Portuguese, and any of these three languages is spoken and understood by the stakeholders invited from the different countries. The CME has not received any single complaint that the submitted documents would not have been understandable. If this had been the case, the respective translated version of the document into the local language would have been provided.
3. Noted.

Response by SustainCERT (round 2)

1. **The Comment/Request is closed.**
2. **The Comment/Request is closed.**

SECTION C:

1. The CME shall explain how the carbon ownership will be transferred from the end-users to the CME and how the end-users would be benefitted from carbon revenues.
2. The CME shall clarify the criteria for recruitment of a new improved cookstove into their programme.

Response by CME (round 1)

1. Section A.4 (legal ownership) of the PoA Design Consultation Report explains that it will be demonstrated for each project activity that ownership of any products that are generated under GS certification (e.g. carbon credits) will be transferred from project beneficiaries (users of improved cookstoves) to the project developer. Any further details on how exactly the end-users will transfer the carbon credit ownership and how the end-users benefit from the carbon revenues will be provided in the VPA-DDs and discussed during the local stakeholder consultation.
2. Since BURN Manufacturing Co. is a manufacturer of highly efficient cookstoves having a broad stove portfolio and at the same time is the CME of the PoA, it is of course BURN's primary interest to deploy its proper stoves in the different VPAs. If however for some reason an organisation is interested to join the PoA with a stove model not manufactured by BURN, then this would have to be discussed on a case by case basis. There are no pre-defined criteria for recruitment of improved cookstoves. The CME however articulated in several responses to stakeholder comments that it is happy to explore about possible synergies and discuss about partnerships (see section C.1 of the PoA Design Consultation Report).

Response by SustainCERT (round 2)
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| <ol style="list-style-type: none">1. The Comment/Request is closed.2. The Comment/Request is closed. |
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