

Lessons Learned: Cookstove Standards & Labeling Strategies and Implementation

Report to the Global Alliance for Clean Cookstoves

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In support of the Global Alliance for Clean Cookstoves (Alliance), in 2016-2017 CLASP assessed the feasibility of implementing cookstove standards and labeling (S&L) programs in four new countries: Kenya, Nigeria, Guatemala, and Haiti.¹ CLASP developed national strategies to help increase the uptake of improved cookstoves (ICS) by households and institutions in each country. The strategies included recommendations for high-level approaches, policies and programs, and implementation activities to put in place S&L and other market transformation programs. In collaboration with the Alliance and others, CLASP developed the strategies with stakeholder inputs gathered during week-long scoping missions, and presented the strategies to stakeholders in workshops or webinars. In addition to the strategies, CLASP designed intervention projects to support Ghana and Uganda in the implementation of their cookstove S&L programs. These intervention projects encompassed strategic activities selected from the critical path of adopting a cookstove S&L program.

This document captures lessons learned from CLASP's involvement in the development of the S&L strategies and the design and implementation of the intervention projects, and offers recommendations for improving future projects. The first section, Summary of Work, describes our scoping and findings for each individual country. The second section, Lessons Learned, discusses observations from the field and opportunities to improve project implementation.

Some key findings include the observations that:

- Industry is a valuable and interested resource, but underutilized and not often consulted.
- Governments and partners conceptualize S&L programs individually, rather than as foundations of a holistic approach to market transformation, to be aligned with other broader activities and interventions.

¹ In 2015-2016, CLASP also developed country strategies for Ghana and Uganda.

- Manufacturers support global and regional market transformation programs built on product performance and testing, such as awards programs.

Summary of Work

Country Strategies

Developing the national strategies for cookstoves S&L programs included mapping stakeholders, ongoing interventions, and the policy framework; determining how a national S&L approach might support ongoing initiatives; and assessing potential challenges and barriers to implementing effective S&L programs. CLASP interviewed cookstove and government stakeholders from all sectors (policy, implementation, test facilities, manufacturers, importers, retailers, civil society, other aid organizations, etc) to provide their perspective on the cookstove landscape and relevant barriers to clean cooking in target countries. The final country strategies - based on the inputs from stakeholders and international S&L best practices - recommended a high-level approach to developing cookstove S&L programs unique to each country, as well as detailed implementation activities, should local partners decide to adopt the high-level approach. CLASP consulted local partners on how to leverage the country strategies to execute the proposed interventions through webinars, phone calls, and in-country workshops and meetings. The specific approaches and status of cookstove S&L programs in target countries are summarized below.

Kenya

CLASP recommended a voluntary, technology-neutral, and endorsement-style labeling program to be developed and implemented over the next 2-5 years as a pilot program, in conjunction with supplemental market transformation initiatives, such as tax policies and incentive programs. Kenyan government agencies and key manufacturers have informally endorsed the recommended approach, and are believed to be developing a corresponding action plan. The biggest barrier to developing and implementing the action plan is funding.

Nigeria

CLASP recommended a voluntary and technology-neutral labeling program, aligned with existing labeling programs for refrigerators and air conditioners, formalization of a cookstoves inter-ministerial steering committee, and a tax incentive program. Nigerian government and key stakeholders are currently reviewing and responding to the proposed strategy.

Guatemala

CLASP recommended a phased-introduction of S&L policies into the national cookstove sector, given the lack of existing legislative and institutional frameworks for S&L. The recently launched Nationally Appropriate Mitigated Action (NAMA) support project on the “Efficient Use of Fuel and Alternative Fuels in Indigenous and Rural Communities” can build a foundation for S&L policies. Specifically, a voluntary, technology-neutral endorsement program, supported by incentives, can help accelerate the transition to an ICS market.

Haiti

CLASP recommended a step-by-step process to introducing S&L, so as to build important foundations for long-term program success, create stakeholder buy-in and Haitian ownership, and to build national capacity, eventually leading to the creation of a comprehensive standard and labeling program. Particular focus should be given to developing coordination and collaboration mechanisms between government and industry, expanding capacity for testing, developing a voluntary certification program for all cookstove technology types, and raising awareness of the need for quality amongst consumers.

Implementation Projects

Ghana

To assist the government in developing the labeling component of a national cookstoves S&L program, the Energy Commission of Ghana (regulator for the energy sector) partnered with the Alliance and CLASP to transfer and apply best practices from energy efficiency labeling programs for on-grid appliances (i.e. electric appliances such as air conditioners and refrigerators). In particular, CLASP provided expert input to three areas:

- 1) Delivered analysis and best practice to inform development of the label tiers, ensuring that Ghanaian tiers were in line with international standards for thermal efficiency and emissions. CLASP also participated in the Technical Committee² to discuss development of the standards.
- 2) Supported a consumer research project to inform design of the label and address a sector-wide data gap. Very limited research is available anywhere on consumer comprehension, behavior, and attitudes towards, and in response to, cookstove labels. Household and institutional users were interviewed to investigate 1) users' comprehension of a draft Energy Commission label, 2) relevance of the label information to users, and 3) users' understanding of benefits of improved cookstoves. Results indicated that a simple, minimal text, endorsement style label may be most effective at communicating to household users. A communications campaign to educate consumers about the meaning and significance of the label, and product performance labels generally, is necessary.
- 3) Provided guidance and input to a cookstove S&L compliance manual, to address the new challenges that come with implementing a program for domestic products (Ghana existing compliance framework under the appliance S&L program addresses imported electric products).

Uganda

CLASP collaborated with policymakers from the Ministry of Energy and the Bureau of Standards (UNBS) to support the design and development of a national certification program for cookstoves. While UNBS took the lead, CLASP served in an advisory capacity to consider and integrate S&L best practice into design of the program. Specifically, CLASP provided expert guidance towards development of certification program materials, and supported planning of

² Technical committee consists of government, academia, NGOs, and technical experts.

two stakeholder workshops to secure buy-in to the program and to both inform and seek industry and civil sector input to the design and key components of the certification program. Various manufacturers have already volunteered to participate in the pilot phase of the program, and UNBS is conducting stakeholder outreach and education efforts on the program before its official launch planned for January 2018.

Lessons Learned

The following sections detail lessons learned from the S&L strategy and implementation work described above. Each lesson learned is categorized as an “observation from the field,” defined as information about the cookstoves landscape (such as technological, market, or stakeholder information); and/or an “opportunity to improve implementation,” defined as information to help international and local organizations improve the efficacy and efficiency of implementing clean cooking projects.



Observations from the Field

1. Resource Allocation

Issue: S&L programs are mistakenly envisioned as a simple solution to complex problems.

Solution: To increase the likelihood of appropriately designed S&L programs, foster political will for S&L at the ministerial level. Leverage local stakeholders with strong political ties or international leaders to advocate for S&L and prime countries prior to- or as part of- engagement by consultants and other experts partners. Consider carefully the potential negative implications of mandatory or hastily designed or implemented S&L approaches on the clean cooking market.

Summary: The process of developing S&L programs requires time and investment, and can typically take five years before a regulation is implemented. S&L programs require legal, financial, human, physical, and institutional resources, as well as strong political will. In target countries, many of these resources already exist to some degree, and each needs bolstering to facilitate design and implementation of an effective cookstove S&L program.

It is common for stakeholders, including manufacturers and even government agencies responsible for S&L, to underestimate - often significantly - the resources and time required to implement these programs. As a result, expectations of S&L’s role in contributing to market transformation, and especially the amount of time and budget required to implement S&L programs and policies, are not aligned. Aligning expectations on the role of these policies and required resources may help speed up the development and implementation process and attract more support for S&L from manufacturers and government, which could ultimately lead to additional funding and improved efficacy.

Political will is an essential requirement for any government-led S&L program. Most of the target countries had some appetite for cookstove S&L, but there is often no clear policy champion to turn will into action. CLASP was able to communicate the value of S&L during

individual meetings with government stakeholders, as well as stakeholder workshops, but there appears to be an opportunity for more engagement and advocacy at both the policy and ministerial levels.

Other factors requiring caution in developing S&L programs (and regulation generally) - to avoid hindering their growth - is the immaturity of clean cookstove markets, and the demographic of the consumer of the product and product performance labels. Target consumers for clean cookstoves fall into different cultural, education, socio-economic groups, and an approach for one consumer group may not be effective for all.

2. Coordination of Government Institutions

Issue: Limited coordination within governments threatens to weaken efficacy of S&L and other market transformation programs.

Solution: Consider organizing an S&L best practice workshop to bring together relevant actors from the cookstove space to clarify responsibilities, roles and needs of all actors from the outset.

Summary: Government ministries and institutions are typically already cooperating on high-level cookstove policy discussions, following market development and industry engagement efforts in other projects. However, S&L programs require ongoing collaboration between different ministries to secure political and resource investment in forging policies, as well as collaboration amongst different institutions or agencies responsible for implementing or administering a program (often undertaken by different bodies).

As S&L for cookstoves is a relatively new concept for various actors in the sector, there was no clear direction which agencies or institutions should be involved in standard or program development. Improving lines of communication and bringing more policy actors into the space can help overcome these challenges and accelerate identification of clear roles, responsibilities, and coordination needs amongst different stakeholders. A policy champion, typically coming from the ministry or agency owning the policy, can help drive and support coordination through inter-ministerial and stakeholder committees, workshops and other means.

3. Engaging Industry

Issue: Industry is a valuable, interested, but underutilized resource, and not often consulted.

Solution: Identify and create (or integrate existing) engagements between industry and relevant stakeholders (or project implementers), across all Alliance focus areas - especially testing and standards and labeling - to improve project efficiency and efficacy. Local (former) Alliance chapters are ideal candidates to facilitate engagement but may need more training/resources. Consider supporting the creation of industry groups to help raise the voice of industry.

Summary: Industry representatives were some of the most informative and committed stakeholders CLASP met with, and served as key resources for learning about the cooking sector broadly, ICS technology, and recent market transformation developments, such as tax exemption changes. However, they were rarely included in conversation about standards,

labeling or certification programs, nor brought in to provide their perspective to steering and technical committees organized by government and NGOs.

The primary reasons for their absence appear to be lack of awareness and communications coming from government and other coordinators, and/or lack of resources to participate in discussions. For example, prior to CLASP's engagement, one of the three major manufacturers in Kenya and Uganda (engaged in broader association discussions) was unaware of the ongoing S&L programs being developed in each country - both of which would have significant impacts on their business and the clean cooking sector broadly. Furthermore, the manufacturer's subsequent attempt to find more information about the S&L programs from relevant government agencies and local and international clean cooking sector coordinators was not successful. As a result, these market transformation programs and policies risked 1) being designed sub-optimally without relying on the best available information, and 2) not being supported by industry.

4. Data

Issue: Product performance and market data is limited.

Solution: Assess the need for product performance and market data, identify stakeholders that can use it, and perform research accordingly. Product data can also be collected through product certification and testing efforts.

Summary: National and up to date product performance and market data are key - and to some governments, required - to justifying and inform the development of S&L programs. This data informs a variety of S&L components, including performance thresholds, labeling tiers, product scope as defined in standards, impact assessments...etc, as well as complimentary market transformation programs, such as incentives and capacity building.

5. Regional Coordination

Issue: Regional coordination and alignment offer easy opportunity for impact.

Solution: Bring together neighboring practitioners and policymakers to participate, network, and/or exchange best practices during an independent workshop or any of the planned S&L stakeholder consultation forums. If successful, this could potentially create a network of S&L policymakers and practitioners across regions to sustain an exchange of ideas and best practices.

Summary: Efforts to develop national cookstove S&L programs are underway in multiple countries, including Kenya, Uganda, Ghana and Nigeria, but the reach and impact of such programs is not always limited to national borders, especially where there are overlapping markets. Learning and sharing experiences among S&L program implementers is important, as well as identifying opportunities for cross-border collaboration where there are overlapping products, markets, or barriers. This is particularly important where differences in approaches, regulations, standards, and conformance assessment measures pose barriers to the movement of goods from one country to another within the region. Opportunities for regional alignment and coordination should be considered - especially between the Uganda National Bureau of

Standards and the Kenya Bureau of Standards, who have both developed ICS standards - and can be easily addressed through study tours, or regional workshops to share experiences.

6. Holistic Approaches to Market Transformation

Issue: Governments and partners conceptualize S&L programs individually, rather than as foundations of a holistic approach aligning broader activities.

Solution: Consider S&L as part of broader market development efforts, and strategize role of these programs upfront in project design to ensure a successful and sustainable holistic approach to market transformation.

Summary: The development of standards and labeling programs are just one of many ongoing types of cookstove market transformation activities in target countries. These include but are not limited to behavior change and communications campaigns (BCC), incentive and procurement programs, capacity building for industry and testing centers, etc. While many of these types of programs overlap, S&L programs can inherently be connected to any program or activity associated with stoves that meet or aim to meet a specified performance criteria.

In many cases, these seemingly tangential or parallel activities are part of the scope of comprehensive S&L programs. For example, communications campaigns are an integral component to S&L, and should therefore either be designed as a component within S&L programs, or aligned very closely with these programs. Otherwise, as in this example, a lack of alignment may result in multiple communication campaigns aimed at the same target audience with different brands and messaging, creating confusion and redundancy, an inefficient use of resources, all while potentially discrediting future S&L efforts. Similarly, tax and import policies, and procurement and incentive programs, should be built upon S&L programs, to strengthen the relevance, impact, and credibility of all involved programs, again reducing redundancy.

7. Promoting Good Products

Issue: Manufacturers support global and regional market transformation programs built on product performance and testing.

Solution: Evaluate the demand for, and feasibility and impact of implementing a global or regional program - such as an awards program - that promotes products based on testing and performance, and serves as a gatekeeper for other market transformation initiatives.

Summary: Examples of these include global or regional awards programs, such as the Global LEAP Awards, or tax exemption policies, and are detailed in the S&L country strategies. These programs would provide incentives through voluntary means, encouraging both the development and improvement of cleaner stoves, and provide a centerpiece for consumer awareness campaigns. Non-regulatory programs like these, that apply beyond national borders (as do ICS supply chains), and are not highly dependent on governments, such as awards programs, are being asked about by industry as a means for non-burdensome market transformation. Lighting Global and Global LEAP Awards are two case studies that show voluntary programs can be successful, and often time more appropriate, for nascent industries in developing economies.



Opportunities to Improve Project Implementation

1. Alliance Market Managers

Issue: Alliance Market Managers are invaluable and have an opportunity to play bigger role.

Solution: Consider clarifying the roles of Market Managers and their relationship and responsibilities associated with Alliance consultants, local stakeholders, and local cookstove alliances. If possible, leverage Market Managers to contribute more directly to implementations and provide their expertise and relationships to improve the impact of interventions.

Summary: Alliance Market Managers have very strong relationships with important stakeholders, across all sectors, appear well respected, and are very knowledgeable and up-to-date on clean cooking initiatives in their countries. Market Managers provided CLASP with significant support ahead of scoping missions, as well as clear interpretations and context from meetings during our scoping missions that were invaluable to the development of the strategy documents. Market Managers should be encouraged to provide more direct input into deliverables, such as the strategy documents, and continue to communicate and provide relevant updates to consultants and other stakeholders. In a few instances, major developments related to cookstoves S&L happened in country (such as technical committee meetings) without our knowledge, which we learned about through other stakeholders or through specific inquiries with Market Managers. Providing clarity on roles and responsibilities of Market Managers can make future coordination and division of responsibilities among consultants, headquarters, and partners more effective.

2. Sharing Knowledge

Issue: Ensure Alliance consultants and topic leaders are aware of ongoing work in target countries.

Solution: Create, maintain, and/or share with implementing partners (i.e. consultants) a list of ongoing projects/interventions (such as BCC campaigns and RTKC capacity building/business plans) within a target country and their implementers at the outset of a project. This list could help implementing partners identify overlaps and opportunities for more efficient and effective interventions. Where feasible, in-person meetings between implementing partners are ideal. Market Managers are particularly well placed to address this opportunity.

Summary: In multiple countries, CLASP became aware of concurrent and interrelated market transformation activities at mature stages of a programs' development or life. When CLASP met with other implementing partners, such as PSI and I-Dev, the meetings and conversations were extremely fruitful. With more communication among stakeholders and coordinators about all ongoing work in a target country, there may be opportunities to apply a more holistic approach that results in greater alignment of similar activities and even more efficient use of resources.

3. Consultant Role

Issue: Leverage consultant or expert experience where possible.

Solution: Identify methods for sharing best practices among Alliance implementing partners, especially those with expertise in a related area. Carefully consider structure of implementation teams, or strongly support engagement for implementing partners to discuss their work, areas of overlap, and opportunities for collaboration. CLASP, for example, can share S&L and product testing best practices with partners working on related activities, such as behavior change and communications campaigns.

Summary: Implementing S&L projects, specifically with multiple contractors, can be time consuming and details can be lost in translation. Typically, primary technical implementers are tasked with subcontracting tasks to local partners which increases efficiency and enables the technical implementer to directly manage inputs and outcomes to project deliverables. For example, the market research project in Ghana was contracted to a firm with experience in consumer research, but little insight to S&L. The project management structure and roles presented challenges for bridging the knowledge gap with respect to applying best practices consumer research for S&L. Many of CLASP's recommendations, for example, were not adopted by the implementing partner, likely as a result of this advisor-partner relationship, in contrast to a more accountable client-consultant relationship. Given CLASP's expertise in S&L activities, direct oversight of implementing partners may allow for a more nuanced, timely, and direct level of input on such projects.

