	CALL FOR INPUT
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Document reference number and title: (Recommendation from the MEP to SBM020) **Concept note: Revision of methodological standards and tools for application to programmes of activities (version 01.0) and its appendices**				
Item	**Section no.** (as indicated in the document)	**Paragraph/Table/Figure no.** (as indicated in the document)	**Comment** (including justification for change)	**Proposed change** (including proposed text)
1	Concept note	Paragraphs 9, 10, 11	The stated focus on Article 6.4 PoA mechanism methodologies that reduce non-renewable biomass consumption (e.g., clean cooking) is understandable given the need to operationalize the mechanism as quickly as possible and the existence of so many clean cook stove PoAs that are waiting to move over from the CDM. Per paragraph 11, it must be made abundantly clear that this is only the first step, and that the MEP plans to make further revisions to the same standards and tools listed as Appendices 1-8 when it undertakes the work to accommodate other large-scale crediting approaches (including other PoA mechanism methodologies). The current language throughout Appendices 1-8 specifies that the proposed revisions will apply to all PoA methodologies, which runs the risk of these clean cooking revisions being interpreted as applicable to all PoA methodology types and thus may set precedent beyond PoAs to other large-scale crediting approaches. We encourage the MEP and SB to specify that the proposed clean-cooking-driven revisions have limited application to PoAs, and are not automatically sufficient for other PoAs, including nature-based PoAs. The Supervisory Body should provide additional guidance on how the revised standards are intended to apply across different sectors and PoA types in future public comment periods.	We encourage the MEP and SB to specify that the proposed clean-cooking-driven revisions have limited application to PoAs, and are not automatically sufficient for other PoAs, including nature-based PoAs. The Supervisory Body should provide additional guidance on how the revised standards are intended to apply across different sectors and PoA types in future public comment periods.

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2	Concept note	Paragraphs 28-32	The Concept Note focuses on immediate revisions needed to operationalize clean development mechanism PoAs (specifically, clean cooking activities). The revisions to the standards are framed as broadly applicable to all PoAs and the Concept Note does not clearly incorporate considerations into this version that would make sense for a diverse range of PoAs, nor propose next steps for future revisions to ensure that all Article 6.4 PoAs have standards and tools that work for them. The MEP may wish to consider publishing a longer-term workplan describing how lessons learned from clean cooking PoA implementation will be used to inform future methodological work on other programme types and larger-scale crediting approaches. As the MEP proceeds, stakeholders would benefit from clarity on how the PoA applicability analysis may inform future work on other large-scale crediting approaches. We encourage a subsequent call for public input to amend Appendices 1-8 for all PoA activity types, beyond the clean cooking focus of this consultation, and the applicability to other large-scale crediting approaches.	We encourage a subsequent call for public input to amend Appendices 1-8 for all PoA activity types, beyond the clean cooking focus of this consultation, and the applicability to other large-scale crediting approaches.
3	Concept note	Paragraph 20	The flexibility for methodologies to include additional requirements for identifying and quantifying leakage in clean cooking PoAs is welcomed. Further guidance may be beneficial as additional categories of programme-based activities are considered in the future. The MEP should grant methodologies the possibility to include differentiations that might be required for PoAs in addressing leakage. An example is international leakage, which falls outside the scope of the Paris Agreement as the PA covers all Parties reporting on emissions within their boundaries, and is currently difficult to quantify (e.g. many countries do not have the detailed or reliable data needed to understand or quantify emissions beyond their sovereign borders).	Suggested language change: “may include additional or differentiated requirements.”

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4	Appendix 1. Draft Standard: Demonstration of additionality in mechanism methodologies (version 3.0)	Paragraphs 4(b)(i), 13, 15(a) and 17	Regulatory additionality analysis can be an important tool for some project types. However, regulatory analysis should not be a required approach for all project types, as it may not be applicable for large-scale crediting activities. For example, the increased enforcement of existing policies that combat illegal deforestation or the creation of new regulations are types of activities that generate emission reductions and are credited under jurisdictional REDD+ and under some projects that comprise PoAs. Requiring the use of regulatory analysis will lock out these large-scale mitigation interventions and should be listed as an optional approach to demonstrating additionality.	Regulatory additionality analysis should be listed as an optional approach to demonstrating additionality.
5	Appendix 1. Draft Standard: Demonstration of additionality in mechanism methodologies (version 3.0)	Paragraphs 16 and 17	The paragraph 16 text is unclear and implies an extra "not" that should be deleted. If Figure 1 "illustrates how mechanism methodologies may combine the approaches referred to in Section 5.1" and then para 16 says "other combinations of approaches are not permitted" then this effectively implies that the flowchart in the figure must be followed, rather than may be followed. The paragraph language should be changed to "Other combinations of approaches are permitted". Notably, regulatory and lock-in risk analysis are not applicable approaches to test for additionality of large-scale crediting such as jurisdictional REDD+. As such, they should be listed as optional approaches, rather than "shall be addressed", in paragraph 17.	The paragraph language should be changed to "Other combinations of approaches are permitted". Regulatory and lock-in risk analysis should be listed as optional approaches, rather than "shall be addressed", in paragraph 17.
6	Appendix 1. Draft Standard: Demonstration of additionality in mechanism methodologies (version 3.0)	Paragraph 61	Performance based approaches should not be limited to homogenized products. These approaches are the most suitable additionality approach for landscape level and large-scale crediting, including for AFOLU activities. We suggest that 61(b) should be deleted as a limitation.	We suggest that 61(b) should be deleted as a limitation.

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7	Appendix 3. Draft Standard: Addressing leakage in mechanism methodologies (version 2.0)	Paragraph 10	The requirement to monitor and report on international leakage is not applicable in the context of the Paris Agreement as all parties monitor and report on emissions within their sovereign borders. Furthermore, international leakage is currently difficult or not possible to quantify for most activities (e.g. many countries do not have the detailed or reliable data needed to understand or quantify it). More fundamentally, international leakage is extremely challenging for an activity proponent to influence due to sovereignty and inability to prevent mitigation impacts crossing international borders. This should be removed as a requirement and should instead be re-written as "…and shall include international leakage where this occurs to the extent possible."	Monitoring and reporting on international leakage should be removed as a requirement and should instead be re-written as "…and shall include international leakage where this occurs to the extent possible."
8	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Paragraph 3(j)	The provided definition of a reversal as "a net loss in the storage of a greenhouse gas or a precursor of a greenhouse gas for which A6.4ERs have been issued" only works for activities that generate removal units. This definition does not work for emission reduction activities because emissions may and likely will continue, so the net storage of that GHG reservoir will go down even if the mitigation activity is successful. The definition should be amended to calculate a reversal relative to a baseline.	The definition of a reversal should be amended to calculate a reversal relative to a baseline, not as a net loss in storage.

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9	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Paragraph 28	Defining a reversal as a negative net change in storage of a greenhouse gas does not seem to allow for activities that reduce emissions, such as IFM and REDD+. In such a situation, the quantity of a GHG stored in the reservoir may decrease after the activity ends without constituting a reversal – for example, if emissions from deforestation and degradation outpace removals from forest regrowth but remain lower than in the baseline scenario. In REDD+, Improved Forest Management (IFM) and other activities that reduce emissions, the net change in emissions is what is important, not the net change in carbon stock. As the current definition seems limited to removal-activity types, we encourage it to be amended to be applicable to emission reduction activities. Activity proponents should be liable at most for the volume of A6.4ERs (i.e. the change) that they generate, not for the carbon stock that is present when activities occur. It is entirely unreasonable for a project proponent to be liable for the entire carbon stock of the forest within which they implement a project or be responsible for its full site remediation. Rather, liability should exist for the generated emission reductions or removals, which is what underlies the actual A6.4ER unit.	We encourage the definition of a reversal (crediting deficit) to be amended to be applicable to emission reduction activities as the current definition is limited to removal-activity types.
10	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Paragraph 44	Large-scale crediting approaches and other PoAs require monitoring across a large accounting area (such as an entire country), so differentiating between avoidable and unavoidable reversals in existing market methodologies is not required and is a conservative approach. We encourage this distinction to be optional and only applied to project methodologies and not applied to large-scale crediting approaches.	We encourage the distinction between avoidable and unavoidable reversals to be optional and only applied to project methodologies and not applied to large-scale crediting approaches.