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Date of submission	24/07/2026

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	-	Para 3(e)	The definition of “greenhouse gas reservoir” limits reservoirs to “the biosphere, geosphere, and hydrosphere.” However, paragraph 7(b) recognises “activities increasing the storage of greenhouse gases ... in products or materials” (e.g. biochar, harvested wood products, concrete) as in scope. Storage in a manufactured product or material is not naturally described as biosphere, geosphere, or hydrosphere storage, creating an internal inconsistency between the Section 2 definition and the Section 3 activity list.	Amend the definition to read: “...includes the biosphere, geosphere, hydrosphere, and products or materials in which carbon or a GHG precursor is durably stored”, or introduce a distinct defined term for this reservoir category.

2	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Para 7(a)	Footnote 4 lists “activities reducing the consumption of non-renewable biomass” (i.e. clean-cooking programmes) as an example of an activity “reducing the loss of carbon stocks ... in the biosphere,” placing it in the same stock/reservoir category as afforestation or peatland rewetting. This is flawed on all possible grounds - Science, Principles & Policy Effectiveness. On the scientific front, MEP failed to realise that activities reducing the consumption of non-renewable biomass is a carbon flow intervention, essentially reducing the annual carbon flux into the atmosphere. This is completely unrelated to the other identified activities - 7(b) to 7(f), which are based on a monitorable carbon stock in an identified reservoir. MEP also failed to recall that PACM is a project based market mechanism, which essentially means that all possible claims and liabilities shall be strictly tagged to the attributiveness of the event with the project. Hence, all sections of a methodology are designed with reference to the impact of the project intervention, including applicability, additionality, baseline, monitoring, etc. How did the MEP find it scientific to make special provisions for permanence risk which defy the scientific basis. If we try to justify this deviation, then additionality might soon be defined as – if the implemented organization (instead of project) would have existed in a business as usual scenario. Secondly, the standard fails to comply with its own defined principles, specifically, 9(c) – Consistency. If the MEP does not distinguish between flow based and reservoir based interventions, then all the methodologies will come under the purview of permanence risk. For example, renewable power/energy projects is displacing the carbon stored in the fossil fuel reservoirs and hence permanence risk needs to be assessed by monitoring the fossil fuel reservoirs. The exemption provided to such projects under 8(a) equally applies to cooking projects. The term “do not interact with atmosphere” has absolutely no consequence in identification of reversal risk and in fact fossil fuel reservoirs are more vulnerable to reversal risks due to many completely avoidable anthropic activities like oil field spillage & fires, deliberate damage to oil fields during war	Cooking sector shall be removed from para 7(a) Para 8(a) shall be revised to remove "do not interact with atmosphere".
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			events. These risks are 100x more damaging than wild fire or forest reversal risk as forests regrow and make up for the lost biomass unlike fossil fuel. It is also noted that the MEP has recently shifted its position on applicability of reversal risk on cooking sector projects. However, there is no explanation provided by the MEP on the scientific basis or rationale for such a stark change in its position. Lastly, the inclusion of cooking projects also fail on the policy effectiveness front, as in absence of the identifiable, exclusive carbon reservoir, it is impossible to monitor the change in carbon stock — footnote 14 itself acknowledges that in a typical cookstove activity “neither the cookstove project activity owner nor the participating households have control over the forests from which biomass is sourced,” precisely why it is used as the illustrative case for the “alternative approaches” carve-out in paragraph 14, implicitly conceding the reservoir-reversal mechanics do not fit. The effectiveness of the policy can only be understood if the desired outcome is the curtailment of cooking projects.	