



CALL FOR INPUT

<i>Name of submitter</i>	Thomas Annicq
<i>Affiliated organization of submitter</i>	Climate Liabilities and Assets Initiative
<i>Email of submitter</i>	Thomas@clai.earth
<i>Date of submission</i>	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	-	paragraph 22	Paragraph 22 provides that mechanism methodologies apply the Methodological tool: Reversal Risk Assessment to component projects. We support making the Reversals Standard applicable to Article 6.4 PoAs and offer one forward-looking observation. The present revision is prioritised to support methodologies reducing non-renewable biomass consumption, where reversal risk is not a material consideration. Appendix 5 will nonetheless become the baseline Reversals Standard inherited by later PoAs in land use and other activity types where storage can reverse. For those activities, a programme comprising many dispersed component projects may carry aggregate reversal risk below the sum of its components, since component-level reversal events are substantially idiosyncratic. Whether that holds in any given case depends on the correlation structure of the programme, and paragraph 7 contemplates generic CPs sharing a common geographical scope, so it should not be assumed. We therefore suggest only that component-level assessment under paragraph 22 be expressed in a way that does not foreclose a programme-level treatment when the standard is later applied to activity types with material reversal risk. We do not propose a methodology for that treatment at this stage.	Retain the component-level requirement in paragraph 22 and Appendix 5, and add wording confirming that it does not preclude the Supervisory Body from providing for a programme-level reversal risk assessment in future, where an activity type carries material reversal risk and the correlation structure of the programme supports it. This could also be noted in the subsequent work identified at paragraph 29, alongside the work already anticipated on how PoAs monitor, report and remediate reversals.