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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)
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1	-	Cross-cutting comments	CROSS-CUTTING COMMENTS The Concept Note on Programmes of Activities (PoAs) is a necessary step as Article 6.4 standards and tools need to work for programmes of activities, not only standalone projects. However, the adjustments proposed in the Concept Note and Appendices appear primarily oriented towards enabling the transition of clean cooking and non-renewable biomass PoAs, although it clearly states under 3.2, 9. that the analysis includes whether the methodological standards and tools listed in Table 1 are already applicable to Article 6.4 PoAs. While the MEP recognizes that subsequent work may be needed for PoAs, the Concept Note does not clearly incorporate considerations into this version that would make sense for a diverse range of PoAs, nor propose clear next steps for future revisions to ensure that all Article 6.4 PoAs have standards and tools that work for them. Several key methodological concepts introduced or elaborated in the revised standards—including best available technology approaches, ambitious benchmark approaches, lock-in risk analysis, and performance-based additionality approaches—appear more readily suited to technology-based mitigation activities. The Supervisory Body should provide additional guidance on how the revised standards are intended to apply across different sectors and PoA types. While the revisions are framed as broadly applicable, several concepts and examples appear primarily informed by clean cooking and household energy programmes, and their application to Agriculture, Forestry, and Other Land Uses (AFOLU) and other nature-based activities remains unclear. Indeed, while it changes applicability language and terminology, it does not yet provide the substantive rules needed to aggregate nature-based activities. Therefore, this distinction needs to be clearly stated in the concept note; otherwise, there is a risk of inconsistent interpretation and application of these standards across sectors in subsequent work, particularly for AFOLU activities. The Concept Note to be submitted to the Supervisory Body should make clear that the proposed clean-cooking-driven revisions	-
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			have limited application to PoAs, and are not automatically sufficient for other PoAs, including nature-based PoAs. For nature-based activities, PoAs are essential for scaling dispersed restoration, agroforestry, blue carbon, smallholder, Indigenous Peoples, Local Communities, and landscape-scale activities. They also provide a natural structure for portfolio-based risk management, which is central to a scientifically credible permanence framework. A robust PoA framework for nature-based activities should allow programme-level additionality, where justified, dynamic baselines, stratified Component Project (CP) eligibility, pooled monitoring, landscape-scale leakage assessment, reversal-risk diversification, and programme-level remediation mechanisms. Before PoAs that apply to nature-based activities are operationalized, Article 6.4 should develop specific requirements for CP stratification, dynamic baseline setting, leakage, monitoring, reversal-risk pooling, risk mitigation, and remediation.	
2	Concept note	Overall document	The Concept Note does not frame PoAs as a tool for portfolio-based risk management. That is a missed opportunity. Permanence should be managed through probabilistic and portfolio-based approaches rather than unrealistic certainty tests. PoAs could be the institutional mechanism for doing exactly that.	Propose adding a section explaining how PoAs can support diversified portfolios, pooled monitoring (similar to pooled project rules used in Verra and Climate Action Reserve), pooled reversal buffers, programme-level governance, and lower transaction costs while maintaining environmental integrity.

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3	Concept note	Paragraph 9, including Table 1, and Paragraph 11	The Standards and Tools listed in Table 1 are prioritized because they are needed to determine whether each methodological standard or tool is: (a) Already applicable to Article 6.4 PoAs; and (b) Required to support the implementation of mechanism methodologies that reduce non-renewable biomass consumption (e.g., clean cooking). However, the assessment seems to have been developed primarily with clean cooking and other technology-based activities in mind. That creates a risk that PoA rules are optimized around clean cooking and fNRB rather than the broader set of Article 6.4 activities, including nature-based activities. The broad applicability but narrow design focus would lead to exclusion of other activities from POAs and the design of rules that are not fit for all sectors.	Amend paragraph 11 specifying clearly that that revisions made for clean cooking should not be presumed sufficient for all POAs, including PoAs for nature-based activities (e.g., REDD+, forestry, blue carbon, agroforestry, IFM, ARR, soil carbon, etc.) and that additional sector-specific guidance will be further developed consistent with the mandate provided in paragraph 3.
4	Concept note	Paragraph 12	The Concept Note states that revisions largely expand the applicability language from projects to PoAs and align terminology across PDD, PoA-DD, and CP-DD. This is necessary but not sufficient. PoAs for nature-based activities require substantive rule adjustments for aggregation, sampling, monitoring, leakage, reversals, and baseline updating, not simply terminology changes.	Clarify that terminology updates are only the first step needed for transition of specific methodologies. Specify that additional methodological revisions will be made to ensure that requirements specific to nature-based activities will be in place before PoAs can be considered robust for ecosystem carbon activities.

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5	Concept note	Paragraph 16 (b) and (c)	Approaches (b) and (c) make eligibility criteria to the operative mechanism through which each CP demonstrates additionality. However, the Concept Note does not propose minimum design requirements for such criteria. At least one set of eligibility criteria should be required for each combination of project activity, geographic area (if applicable), baseline scenario, and additionality demonstration, and criteria must be objective and verifiable ex ante. Embedding equivalent minimum requirements in the Additionality Standard would ensure consistency across mechanism methodologies and avoid sector-specific retrofitting later. Where the mechanism methodologies also contain scale or capacity thresholds, this combination creates an incentive to fragment what is, in substance, a single, large activity into multiple nominally small CPs, or even parallel PoAs, to access simplified requirements or circumvent thresholds. Introducing a cluster safeguard would protect environmental integrity across all activity types without burdening dispersed programmes.	Amend paragraph 16 to note that where additionality is demonstrated in accordance with approaches (b) and (c), the Standard shall require that at least one set of eligibility criteria be defined for each combination of generic component project (and geographic area, if applicable) covered by the Article 6.4 PoA. Eligibility criteria shall be objective and verifiable ex ante and shall ensure, at a minimum, that: (i) is not mandated by applicable law or regulation (regulatory surplus); (ii) has a start date that is the same as or later than the start date of the Article 6.4 PoA; (iii) is supported by evidence of the activity participants' right to the ERs or net removals generated by the CP; (iv) has characteristics consistent with the demonstration of additionality performed at the level of the Article 6.4 PoA, as applicable. Add to paragraph 16 an indication that, where a mechanism methodology specifies scale or capacity limits or differentiated requirements based on CP scale, the revised Additionality Standard (Appendix 1) will require CPs under common ownership or control and implemented in geographic proximity to be assessed jointly against such limits (i.e., as a cluster), with no CP permitted where its inclusion would cause a cluster to exceed an applicable limit, and with activity participants required to confirm that the PoA or any CP is not a fragmented part of a larger activity designed to circumvent applicable limits or requirements. The Concept Note should also indicate that the Additionality Standard will expand the anti-dividing rule (dividing an activity into its technical components) from paragraph 14 to cover the fragmentation of an activity into multiple CPs or parallel PoAs (dividing a large activity into many small CPs within a PoA), with joint cluster evaluation.

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6	Concept note	Paragraph 18 (b)	Where approach (b) is used, and the baseline scenario is standardized at the PoA level, the validity of the standardized scenario should be demonstrated for the entirety of each geographic area to which it applies.	Add a note in paragraph 18 that, where the baseline scenario or the BAU scenario is determined in a standardized manner at the level of the Art. 6.4 PoA, the Baseline Standard will require activity participants to demonstrate that the scenario is valid for the entirety of each geographic area to which it applies. Where such validity cannot be demonstrated, the geographic area shall be redefined or subdivided accordingly.
7	Concept note	Paragraph 20	The MEP's proposed revisions to the Leakage Standard are necessary but not sufficient. By extending the full Leakage Standard to PoAs, while allowing methodologies to include additional requirements for identifying and quantifying leakage emissions in the context of PoAs, the MEP misses the opportunity to grant methodologies the possibility to include differentiations that might be required for PoAs in addressing leakage. An example is international leakage which is currently difficult or not possible to quantify (e.g. many countries do not have the detailed or reliable data needed to understand or quantify it).	Amend the paragraph with the inclusion in red/bold: "In addition to expanding its applicability to Article 6.4 PoAs, the proposed revisions to the Leakage Standard indicate that mechanism methodologies applying the standard to Article 6.4 PoAs may include additional and/or differentiated requirements for identifying and quantifying leakage emissions in the context of Article 6.4 PoAs, as necessary."

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8	Concept note	New paragraph(s) suggested and/or Paragraph 29	The MEP omits areas of subsequent work that are needed on PoAs: (1) Neither the Concept Note nor the revised standards address the movement of a CP between Article 6.4 activities, i.e., a CP that leaves one PoA and is subsequently enrolled in another PoA or registered as a stand-alone Article 6.4 project. Without an explicit safeguard, such movement creates risks of double counting, of re-baselining an ongoing activity, and of evading pending reversal-remediation or monitoring obligations attached to the original PoA. (2) PoAs for nature-based activities require substantive rule adjustments for aggregation, sampling, monitoring, leakage, reversals, and baseline updating, not simply terminology changes.	Include additional elements of subsequent work: (1) And Development of an amendment to the relevant Standards and procedures (including A6.4-SBM018-A09 and A6.4-PROC-AC-003) providing that a CP that has left an Article 6.4 PoA shall not be included in another Article 6.4 activity unless (i) any outstanding monitoring, reporting and reversal-remediation obligations pertaining to that CP have been discharged, and (ii) the mechanism registry records ensure that no emission reductions or net removals are credited more than once for that CP. (2) Elaboration of additional methodological revisions to ensure that requirements specific to nature-based PoAs will be developed to ensure they are robust for ecosystem carbon activities. These should allow programme-level additionality, where justified, dynamic baselines, stratified CP eligibility, pooled monitoring, landscape-scale leakage assessment, reversal-risk diversification, and programme-level remediation mechanisms.

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9	Concept note	New paragraph(s) suggested	The SBM gave the MEP the mandate to prepare the concept note for revision of methodological standards and tools for the application of programmes of activities in response to the requirement from the MEP oriented specifically to allow for the transition of PoA clean cookstoves from the CDM to Article 6.4. However, 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. Several concepts and examples appear primarily informed by clean cooking and household energy programmes only. This includes key methodological concepts in the revised standards—including best available technology approaches, ambitious benchmark approaches, lock-in risk analysis, and performance-based additionality approaches. The Supervisory Body should provide additional guidance on how the revised standards are intended to apply across different sectors and PoA types and avoid their application to other sectors beyond clean cookstoves in subsequent work.	Add a paragraph specifying that subsequent work will be needed to assess the need and required revisions to the methodological standards and tools for application to PoAs for nature-based activities (e.g., REDD+, forestry, blue carbon, agroforestry, IFM, ARR, soil carbon, etc.).