



CALL FOR INPUT

<i>Name of submitter</i>	Serah Wangari, Daisy Jelagat
<i>Which Party do you represent?</i>	Kenya
<i>Email of submitter</i>	serah.wangari@kayopulse.com
<i>Date of submission</i>	27/07/2026

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 16 of the draft Leakage Standard requires that, for REDD+ activities falling under Article 5, paragraph 2 of the Paris Agreement, mechanism methodologies demonstrate the activity's inclusion in all four elements referred to in decision 1/CP.16, paragraph 71 — including, at sub-paragraph (c), inclusion of the activity's geographical boundary in the host country's national forest monitoring system (NFMS). Paragraph 17 provides an interim pathway: where an activity is not yet included in all four elements, methodologies may accept a letter from the host country's REDD+ focal point committing to a date of inclusion, with actual inclusion required and DOE-verified no later than the first verification. This interim pathway addresses formal, procedural inclusion. It does not, on its own, resolve the underlying data problem for leakage identification and quantification. Leakage calculation for REDD+ PoAs (sections 5.2 and 5.3 of Appendix 3) will in practice depend on the same underlying NFMS outputs — deforestation drivers, activity data, reference levels — that a complete national system would supply. Countries with mature, well-resourced NFMS infrastructure will be able to support country-specific, higher-resolution leakage factors. Countries whose NFMS is still under development — which includes a significant share of the countries hosting Africa's REDD+ and	● Alongside the interim focal-point letter mechanism in paragraph 17, the Standard should specify that a conservative interim/default leakage value may be used by activity participants where a complete NFMS is not yet in place for the relevant leakage sources (e.g., diversion of pre-project agricultural or forestry activity, competition for resource use). ● The default should be set conservatively enough that a country's later transition to country-specific NFMS data always results in an equal or higher creditable outcome than remaining on the default — so that adopting better national data is always rewarded, never penalized. ● The burden of proposing and justifying this default value should sit with the mechanism methodology proponent, not with individual under-resourced component projects, consistent with how the Standard already assigns other identification and calculation burdens to proponents. ● Use of the interim default should be explicitly time-bound and subject to periodic review against emerging national data — mirroring the uncertainty-based conservativeness principle already set out in the Reversals Standard (Appendix 5, paragraph 10), which we would suggest cross-referencing into the Leakage Standard.	-
---	---	--	---	---

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)
		agroforestry pipeline — will either be unable to proceed, or will need to rely on more generic, non-country-specific default assumptions. If those defaults are set conservatively without a clear, symmetric pathway to country-specific data, the practical effect is that financing gravitates toward jurisdictions that already have the infrastructure, rather than toward the projects with the strongest mitigation case. Reference: Appendix 3 (Draft Standard: Addressing leakage in mechanism methodologies, v02.0), paragraphs 16–17; see also the general conservativeness requirement at paragraph 8.		

2	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Section 5 of Appendix 5 requires mechanism methodologies to apply the forthcoming Methodological Tool: Reversal Risk Assessment to determine the share of A6.4ERs contributed to the reversal risk buffer pool, and, for PoAs, requires this tool to be applied at the component-project level and described in the PoA design document. As footnoted in the draft standard, that tool is still under development and has not yet been published for consultation. Because the tool itself is not yet public, this is the right moment to establish the evidentiary bar for what may be included in it, before specific risk factors are locked in. In comparable voluntary carbon standards, reversal-risk scoring frequently draws on generic country-level indices — political stability, governance quality, rule-of-law scores — as inputs to the buffer calculation. These indices are attractive because they are standardized and easy to apply uniformly across host countries. However, they are frequently weak or unproven predictors of reversal specifically, as distinct from general country or investment risk: many are built from perception surveys that correlate more closely with income level and international media coverage than with observed drivers of reversal such as fire, encroachment, or land-use change. Adopting such indices as reversal-risk proxies would risk systematically raising	● When the Reversal Risk Assessment Tool is developed, the MEP should require that any risk factor be included only where it has a demonstrated, evidence-based link to reversal outcomes for the relevant activity type or reservoir — consistent with the Relevance and Accuracy principles the MEP has already adopted in Appendix 5, paragraph 9. ● Generic country-level governance or political-risk indices should not be used as a direct proxy for reversal risk unless their predictive validity for reversal specifically — not general investment or country risk — has been demonstrated and published. ● Where activity-level or landscape-level evidence (site fire/encroachment history, tenure security at the specific site, the quality of the activity's own risk mitigation plan) provides a more direct and better-evidenced indicator of reversal risk than a national proxy, the tool should require that this activity-level evidence take precedence. ● Given its direct bearing on buffer contributions — and therefore on the commercial viability of credits — the design and weighting of the Reversal Risk Assessment Tool should be released for public consultation in draft form before finalization, in the same manner as the standards addressed in this concept note.	-
---	--	---	--	---

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)
		the buffer contribution — and therefore reducing net creditable A6.4ERs — for activities in African and other emerging-economy host countries, independent of each activity's own demonstrated performance, without evidence that doing so reduces reversals or improves environmental integrity.		