



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	-	§ 7(a), footnote 4	Footnote 4 lists “activities reducing the consumption of non-renewable biomass” under § 7(a) (“activities increasing carbon stocks or reducing the loss of carbon stocks ... in ... the biosphere”), thereby classifying them as biosphere-stock activities. This is technically incorrect: improved cookstove (ICS) and other non-renewable-biomass (NRB) reduction activities are credited on avoided combustion emissions — a flow ($-\Delta E$, Equations 3–4) — not on any credited change in stock (ΔS). The same activity type is placed by § 8 and footnote 10 among activities not subject to reversal risk (energy efficiency; fuel switching). Retaining the phrase in footnote 4 creates a direct internal contradiction and improperly draws flow-based activities into the reversal regime.	Delete the phrase from footnote 4: “...activities reducing the consumption of non-renewable biomass.”

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2	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	§ 8 (and footnote 10)	For consistency with the flow-based crediting basis of NRB-reduction/ICS activities, § 8 should expressly deem these activities not subject to reversal risk. They reduce combustion emissions through energy efficiency and/or fuel switching (already reflected in footnote 10) and generate avoided-emission flows, with no change in a greenhouse gas reservoir eligible for issuance.	Add a new sub-paragraph 8(c): “(c) Activities reducing the consumption of non-renewable biomass, where A6.4ERs are issued for avoided combustion emissions and not for a credited change in the storage of a greenhouse gas reservoir.” Consequentially, amend footnote 10: “... energy efficiency improvements, fossil fuel switching, and activities reducing the consumption of non-renewable biomass.”
3	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	§ 2(j) [Reversal] with § 12(b), § 13	The definition of “reversal” is confined to “a net loss in the storage of a greenhouse gas ... for which A6.4ERs have been issued.” An activity credited solely on a net change in emissions (Equation 3), with no reservoir eligible for issuance under § 12(b), has no quantity capable of the “net loss in storage” the definition requires. The Standard should confirm that such activities fall outside the reversal definition and outside §§ 12–13, so the reversal machinery is not applied where it has no object.	Add a clarifying paragraph after § 13 (or a footnote to § 2(j)): “For the avoidance of doubt, an Article 6.4 activity for which A6.4ERs are issued solely on the basis of a net change in emissions (Equation 3), and for which no change in the storage of a greenhouse gas reservoir is eligible for issuance under paragraph 12(b), does not give rise to a reversal within the meaning of paragraph 2(j) and is not subject to paragraphs 12–13.”
4	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	§ 14 and footnote 14	Paragraph 14 permits alternative approaches only where all three conditions are met — (a) no control over the reservoir; (b) reservoir not co-located with the activity; (c) reservoir changes not attributable to the activity. Footnote 14 concedes that a cookstove activity satisfies all three. Any reversal of such a reservoir is therefore, by § 2(m), an “unavoidable reversal.” This characterisation should be made explicit, because it is the premise for full exemption (see Comment 5): where the proponent has no control over, connection to, or attributable influence upon the reservoir, a buffer manages no risk the proponent can affect.	Add a sentence at the end of § 14: “Where all of the conditions in (a)–(c) are satisfied, any net loss in the storage of the applicable greenhouse gas reservoir constitutes an unavoidable reversal within the meaning of paragraph 2(m).”

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5	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	§ 17 (with § 16)	Read with § 16 (which limits alternative approaches to monitoring, reporting and post-crediting provisions), § 17 requires even activities meeting all three § 14 conditions — which the Standard concedes ICS activities do (§ 14, fn. 14) — to apply the reversal-risk tool [§ 17(a)] and contribute to the buffer. This is incoherent: it imposes a buffer against an unavoidable reversal (§ 2(m)) that the proponent cannot cause, prevent, monitor, or be attributed. Satisfaction of the § 14 conditions should trigger full exemption from the tool and buffer, not merely a monitoring/reporting waiver.	Add a new § 17bis (or chapeau proviso to § 17): “Notwithstanding paragraph 17, where all of the conditions in paragraph 14(a)–(c) are satisfied for every applicable greenhouse gas reservoir, the Article 6.4 activity shall be exempt from the ‘Methodological tool: Reversal risk assessment’ and from any contribution to the reversal risk buffer pool account, as any reversal of such a reservoir would be an unavoidable reversal within the meaning of paragraph 2(m).”