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<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)
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1	-	Section 3. Applicability, Paragraph 7a	The statement in par 7 (a) “Activities increasing carbon stock or reducing the loss of carbon stocks, relative to the baseline, in any greenhouse gas reservoirs of the biosphere” and footnote (4) “This includes, for example, afforestation, reduced deforestation, peatland rewetting, agricultural practices to enhance soil organic carbon, activities reducing the consumption of non-renewable biomass.” implies that improved and clean cooking projects reducing non-renewable biomass use should also include non-permanence provisions. The clean cooking methodology (A6.4-MEP014-A04) includes woody biomass of the landscape under the activity boundary but does not require the calculation or monitoring of carbon stock changes in baseline or activity scenarios. Instead, it quantifies energy use changes. This does not meet the requirement of “reducing the loss of carbon stocks relative to the baseline.” Thus, improved and clean cooking activities should not be required to apply non-permanence provisions. Although, footnote 4 mentions the consumption of non-renewable biomass as potential example, however, according to Article 31 of the Vienna Convention on the Law of Treaties (1969) treaties must be interpreted in good faith in accordance with the ordinary meaning of their text, in context, and in light of their object and purpose. The “text” refers to the operative provisions formally adopted by the Parties, while footnotes are considered part of the context but do not carry binding force. UNFCCC and Paris Agreement practice confirms this distinction: binding obligations are contained in numbered paragraphs and annexes, whereas footnotes serve only as explanatory or illustrative references. Consequently, footnotes cannot create or expand obligations unless explicitly incorporated into the operative text or subsequent agreements adopted by the Parties. We request that the SB avoids over interpretation of footnote 4 and substantially look at text / body of paragraph 7a.	Clarify that non-permanence provisions apply only when methodologies explicitly quantify carbon stock changes in reservoirs, not when they measure energy efficiency or fuel substitution.
2	Appendix 5. Draft Standard: Addressing non-permanence and	Section 3 Applicability, Paragraph 8 (a)	The standard explicitly exempts from reversal risks “activities reducing the combustion of fossil fuels that, in their natural deposits or during storage after extraction, do not interact with the	Revise the provision to clarify that activities reducing fossil fuel combustion are not automatically exempt from reversal risks. While fossil fuels in deposits or storage do not interact with the atmosphere until combusted, the

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	reversals in mechanism methodologies (version 2.0)		atmosphere.” This creates an inconsistency: if a project reduces dependency on fossil fuels, the underlying reserves remain accessible and can still be extracted and combusted by others at a later stage. In such cases, the avoided emissions are not guaranteed to be permanent, raising the question of why these activities are not treated as subject to non-permanence risks in the same way as land-based carbon stock projects or the current treatment of energy efficiency project relying on non-renewable fuel sources.	reserves remain accessible and may be extracted and burned later by other actors. The text should therefore distinguish between permanent emission reductions (e.g., destruction of reserves or binding restrictions on extraction) and temporary avoidance (e.g., reduced demand) and require methodologies to assess whether such activities could lead to future emissions if reserves are subsequently exploited. Alternatively, if the SB maintains the current exemption for fossil fuel combustion reduction activities, then energy efficiency improvement projects (such as clean cooking or household energy efficiency) should be treated consistently. These projects also reduce emissions through avoided combustion but do not directly alter carbon stock reservoirs. To ensure equal treatment, non-permanence provisions should not apply to energy efficiency projects, aligning them with the exemption currently granted to fossil fuel reduction activities.

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3	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Section 5. Identification of Applicable Reservoirs, Paragraph 14	Paragraph 14 of the standard allows for alternative approaches when three conditions are met: a. Activity participants have no control over the greenhouse gas reservoir; b. The reservoir is not located where the mitigation activity is implemented; and c. Observed changes in the reservoir cannot be attributed to the mitigation activity. In the case of improved cooking projects using non-renewable biomass in both baseline and project scenarios, all three conditions are satisfied. These projects do not exercise control over the biomass reservoir, the activities occur within households / institutions rather than within the reservoir itself, and the methodology does not require monitoring of reservoir stock changes. Consequently, such projects should not be treated under the same permanence requirements as removal-based activities or activities whose primary objective is to preserve or enhance forest carbon stocks. Improved cooking projects should therefore be exempt from non-permanence provisions and buffer pool contributions.	Revise the standard to explicitly exempt improved cooking projects and similar energy efficiency activities from non-permanence provisions and buffer pool contributions, recognizing that they do not directly alter carbon stock reservoirs and therefore should not be treated like removals projects.

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4	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Section 6. Quantification of Emission Reductions and Reversals, Paragraph 19 and 20	Equation 1 of the standard requires project developers to calculate carbon stock changes in reservoirs between baseline and project scenarios. This approach is entirely inappropriate for improved cooking projects, which are based on changes in household energy consumption rather than direct measurements of carbon stocks. Paragraph 19(a) of section 6 further states that “mechanism methodologies shall apply all subsections of this section for use during an Article 6.4 activity’s crediting period.” In the case of clean cooking methodologies, this requirement is impossible to fulfill, as these projects do not quantify reservoir stock changes. This mismatch demonstrates that applying non-permanence provisions to clean cooking projects is unjustified and provides further grounds for exempting them from non-permanence provisions and buffer pool contributions.	Revise the standard to explicitly exempt methodologies based on energy consumption (e.g., clean cooking projects) from the requirement to apply Equation 1 and related non-permanence provisions. These projects should be classified as emission avoidance activities, not removals, and therefore excluded from buffer pool contributions.
5	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	Section 6.5. A6.4ER contributions to the reversal risk buffer pool account	Equation 8, parameter $\Delta Si,t$ is defined as the net change in the storage of a greenhouse gas, or its precursor, within a greenhouse gas reservoir. By definition, this parameter relates to stock changes in a reservoir. However, efficiency-based projects such do not directly influence carbon stocks; they measure reductions in energy consumption and avoided combustion. Applying $\Delta Si,t$ to such projects in order to calculate buffer pool contributions is therefore conceptually flawed. This highlights once again the inappropriateness of imposing non-permanence provisions on activities that do not quantify or alter carbon reservoirs.	Revise the standard to exempt methodologies based on energy efficiency and avoided combustion from the requirement to apply Equation 8 and related non-permanence provisions. These projects should be classified as emission avoidance activities, not removals, and excluded from buffer pool contributions.

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6	Appendix 5. Draft Standard: Addressing non-permanence and reversals in mechanism methodologies (version 2.0)	General Comment	Clean cooking projects are predominantly implemented in least developed countries (LDCs) and small island developing states (SIDs). Decisions 2/CMA.3 and 3/ CMA.3 explicitly call for recognition of the special circumstances of these countries and for measures that encourage participation by small and micro-businesses. Applying non-permanence provisions and buffer pool contributions to clean cooking activities undermines these objectives. Such requirements would further erode already conservative crediting baselines, making projects financially nonviable and preventing urgently needed investment in technologies that deliver both climate and development benefits.	Explicitly exempt improved and clean cooking activities from non-permanence provisions.