



CALL FOR INPUT

<i>Name of submitter</i>	Laurent Perrinjaquet
<i>Affiliated organization of submitter</i>	BURN Manufacturing
<i>Email of submitter</i>	laurent.perrinjaquet@burnmfg.com
<i>Date of submission</i>	24/07/2026

Document reference number and title: (Recommendation from the MEP to SBM020)

Draft Methodological tool: Reversal risk assessment

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	-	"General / Fundamental Cover Note para 10, 12, 19, 22, 53 Scope of application (Section 4.2)"	"We welcome the MEP's work to provide a clear permanence pathway for activities transitioning from the CDM to the Article 6.4 mechanism. We would, however, respectfully encourage the MEP to reconsider the central premise on which the tool's application to clean cooking rests. The Cover Note (para 22) characterises the emission reductions of activities that reduce non-renewable biomass consumption as ""reductions in losses of non-renewable biomass (i.e., biomass gain relative to the baseline) in forests"", and on that basis brings clean cooking activities within a reversal-risk and buffer-pool regime (para 10, 12, 19, 53). In our view this characterisation does not reflect the physical nature of the activity, and it leads to a conclusion on applicability that we believe should be revisited. Improved cookstove (ICS) projects reduce the quantity of biomass fuel, fuelwood or artisanal charcoal, combusted per household cooking event. The emission reduction arises because a portion of the biomass combusted in the baseline is sourced from non-renewable stock's; when that combustion is avoided, the associated CO2 is never emitted. No carbon is captured, sequestered or stored, and the activity does not create or modify a greenhouse gas reservoir. The credited outcome is an avoided emission (a flow that does not occur) rather than a net enhancement in storage (a stock that could later be released). A reversal, by definition, requires that a prior sequestration or storage event be undone. In an ICS project there is no sequestration event and no stored stock of ""saved"" carbon that could be reversed: once the combustion does not occur, the avoided emission is permanent. We would therefore respectfully suggest that treating a forest's exposure to disturbance as capable of reversing a household's already-realised fuel savings brings together two different mitigation pathways (avoidance and removal) that the mechanism otherwise keeps distinct. We note that this understanding is shared more widely. The ICVCM Board Observations on Cookstoves and Biodigesters state that ""methodologies may not directly measure and address reversal risks because emission reductions	"We recommend that the tool clarify that activities reducing non-renewable biomass consumption generate avoided emissions, rather than removals or enhancements in storage, and are therefore not subject to reversal risk in the sense addressed by A6.4-STAN-METH-007. On that basis, we recommend that Article 6.4 clean cooking activities be exempted from this tool and from any buffer-pool contribution, with F_{buffer,i,t} set to zero for this activity type, and that this be stated in the Cover Note and the tool. Should the Supervisory Body prefer to retain a nominal assessment, we would encourage a default negligible or zero rating for this activity type (see comments 6-9), rather than the application of forest-stock disturbance risk to an avoided-emission activity."
---	---	--	--	---

Document reference number and title: (Recommendation from the MEP to SBM020)**Draft Methodological tool: Reversal risk assessment**

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)
			are derived from energy displaced or saved, rather than from maintaining biomass stocks""", and Gold Standard's Paris-aligned clean cooking suite reaches a comparable conclusion (see comment 4)."	
2	2. Definitions	"Definitions (Section 2, para 6) Table 1 (para 2) , F_buffer,i,t"	"We note that the tool's own definitions are framed consistently around greenhouse gases stored in a reservoir: _ Reversal risk: the risk of reversal of greenhouse gases or their precursors stored in one or more applicable greenhouse gas reservoir(s)"" (para 6(c)); _ Reversal risk factor: the estimated loss of credited greenhouse gas stocks over a 100-year period ..."" (para 6(d)); _ F_buffer,i,t (Table 1) is ""the fraction of the net enhancement in storage of a greenhouse gas or a precursor in reservoir i, resulting from the Article 6.4 activity ..."" A clean cooking activity produces no net enhancement in storage and stores no greenhouse gas in a reservoir; it reduces a flow of emissions at the point of use. We would respectfully observe that applying a parameter defined as a fraction of ""net enhancement in storage"" to an activity that delivers no such enhancement creates a tension within the tool, and that the fit is achieved only by treating avoided harvest as ""biomass gain in forests"" in Section 4.2, which sits uneasily with the defined terms in Section 2."	"We recommend resolving this tension in favour of the defined terms: because activities reducing non-renewable biomass consumption produce no net enhancement in storage and store no greenhouse gas in a reservoir, F_buffer,i,t is effectively zero for them and the tool need not apply. We would also suggest revisiting Section 4.2 so that it aligns with the storage-based definitions in Section 2 and Table 1, rather than treating avoided non-renewable biomass combustion as a stored forest-carbon stock."

Document reference number and title: (Recommendation from the MEP to SBM020)**Draft Methodological tool: Reversal risk assessment**

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)
3	4. Applicability	"Alignment with the fNRB Tool Cover Note para 22, 29-31 Section 4.2 para 15; Section 5.1"	"We would like to draw attention to the fact that the forest-carbon integrity risk the tool seeks to address is already managed by the fraction of non-renewable biomass (fNRB) parameter, which is the established instrument for cookstove activities. Under fNRB, only the non-renewable fraction of biomass consumption generates creditable reductions; if regeneration improves and the stock becomes more renewable, fNRB falls and credited reductions fall accordingly. The tool ties its geographic level of analysis to the fNRB Tool (para 29-31) and derives its natural reversal risk from forest disturbance dynamics, that is, from the same biophysical phenomena that fNRB already reflects. Applying a reversal-risk buffer in addition to fNRB would, in our view, address the same underlying risk twice: the activity is first adjusted to the non-renewable fraction through fNRB, and then adjusted again through F _{buffer} for the possibility that the same forest is disturbed. We are concerned that this would lead to systematic under-crediting of genuine mitigation."	"We strongly recommend that fNRB (A6.4-AMT-009) be recognised as the appropriate and sufficient instrument for managing forest-carbon integrity risk in activities that reduce non-renewable biomass consumption, and that this be confirmed in the Cover Note and in A6.4-STAN-METH-007. We would encourage the MEP not to apply an additional reversal-risk buffer to these activities. Where any residual concern remains, we suggest it be addressed within the fNRB framework (including through dynamic or marginal fNRB approaches) rather than through a separate, overlapping adjustment."

4	4. Applicability	"Section 4.2 para 15(b) Paragraph 13 of A6.4-STAN-METH-007 (No-control considerations)"	"We note that the tool itself recognises the limited relationship between the activity and the reservoir. Section 4.2 para 15(b) requires participants to identify ""a geographic area or region, rather than a specific parcel or plantation, as the source of non-renewable biomass"", and footnote 15 confirms that reduced loss ""is expected to occur across the relevant geographic area or region, rather than be attributable to a specific parcel of land or plantation."" Activity participants do not own, manage or control the forest reservoir, and changes in that reservoir are not attributable to the activity site. These are the circumstances contemplated by paragraph 13 of the Reversals Standard for alternative or no-control treatment. A buffer pool is well suited to giving participants an incentive to prevent or remediate reversals in a reservoir they influence; where participants have no such ability, the buffer provides limited risk-management value, while participants' economic incentives are in any case already aligned with reducing biomass consumption. We note that other standards have adopted this reasoning. Gold Standard's Paris-aligned clean cooking methodology states that ""the activity developer operates the technology distribution and data management infrastructure but possesses no legal control, land tenure, or management authority over the physical greenhouse gas reservoir (the forest or land area). Consequently, the activity is formally classified under the 'No Control' exemption regarding the carbon reservoir. Non-permanence buffer pool deductions are therefore fundamentally inappropriate for avoidance activities applying this methodology and shall not be required."" The ICVCM reached a comparable conclusion, and the Project Developer Forum submitted a Stakeholder Communication on permanence and fNRB in clean cooking to the Chair of the Supervisory Body on 4 February 2026."	"We recommend that the tool adopt a no-control treatment for activities reducing non-renewable biomass consumption: given that participants have no control over, and no attributable relationship to, the greenhouse gas reservoir, we suggest that buffer-pool contributions not be required for these activities. We would encourage alignment of the Article 6.4 treatment of non-permanence in clean cooking with the approaches already adopted by the ICVCM and Gold Standard, and with the position set out in the PD Forum's 4 February 2026 Stakeholder Communication, in the interest of credit comparability and market confidence across standards."
5	5. Reversal risk assessment	"Section 5.1.1 (Natural reversal risks), para 19-20, Eq 2 Appendix 2 Cover Note para 32-36"	"We note that the natural reversal risk factors (R_{wildfire} and R_{other}) are derived from global forest-disturbance modelling of standing forest carbon stocks, the ""absolute reversal"" method of Wu et al. (2026), applied across disturbance and climate scenarios (Cover Note para 32-36;	"We recommend that forest-stock disturbance rates (Wu et al. 2026 / Appendix 2) not be applied to activities that reduce non-renewable biomass consumption. Where these methods are retained for the tool's future forestry or removals applications, we suggest they be kept separate from avoided-emission activities. For

Document reference number and title: (Recommendation from the MEP to SBM020)**Draft Methodological tool: Reversal risk assessment**

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)
			Appendix 2). That approach estimates the probability and severity of loss of a forest carbon stock. We would suggest that this is not the most appropriate quantity for an avoided-emission activity. A cookstove A6.4ER does not correspond to a tonne of standing forest carbon that could be released by disturbance; it corresponds to a tonne of combustion that did not occur. Whether a forest elsewhere in the jurisdiction is disturbed in a future period does not undo fuel savings that households have already delivered. Applying stock-loss disturbance rates to a flow-based avoided emission therefore appears, in our view, to be a conceptual mismatch in the context of demand-side biomass reduction."	clean cooking activities, we recommend that the natural reversal risk rating be set to zero, consistent with the avoided-emission nature of the activity and with fNRB already addressing forest-carbon integrity."
6	5. Reversal risk assessment	"Section 5.1.1 para 21 (mitigation = 0) Section 3.6 / Cover Note para 46-47 (no upper limit) Section 5.1 para 18, Eq 1"	"We would like to raise two further design features that we believe warrant reconsideration: (a) Reversal risk reduction (mitigation) factors for natural reversal risks are "deemed to be zero by default" (para 21). As a result, a clean cooking project has no means of reducing the natural component of F _{buffer} , notwithstanding that the tool elsewhere relies (para 15(b)) on the fact that the project does not own or manage the forest. This places the project in the position of contributing in respect of a risk it cannot mitigate, in a reservoir it does not control. (b) The tool proposes no upper limit on the reversal risk rating for this activity type (Cover Note para 46; Section 5.1 para 18 caps F _{buffer} only at 1). Combined with the additive treatment of natural and human-induced ratings (Eq 1) and the currently undefined human-induced factors, the resulting exposure is difficult to predict, which may in itself affect investment decisions and the pricing of the resulting credits."	"For activities reducing non-renewable biomass consumption, we recommend that the natural reversal risk rating, and hence F _{buffer} , be zero (see comments 1-6). Should any rating be retained, we suggest allowing it to be reduced to a negligible level through recognised project circumstances, rather than fixing mitigation at zero. We would also encourage the introduction of an upper limit on the reversal risk rating for this activity type, and/or an explicit negligible-risk classification (see comment 9), so that exposure is bounded and predictable for developers and buyers."

Document reference number and title: (Recommendation from the MEP to SBM020)**Draft Methodological tool: Reversal risk assessment**

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)
7	5. Reversal risk assessment	"Section 5.1.2 (Human-induced reversal risks), para 22, Eq 3 Cover Note para 39-41 (Questions 01, 02, 03)"	"In response to the MEP's Questions 01-03 concerning the determination and combination of human-induced reversal risk factors and reduction factors, we would suggest that, for activities reducing non-renewable biomass consumption, the human-induced reversal risk factor R_{human} should be set to zero. As the Cover Note notes, the MEP was "unable to identify any peer-reviewed studies or other analytical literature that provided a clear empirical or analytical basis for projecting human-induced reversal risks" for this activity type (para 39). The candidate drivers referenced in the Standard and the definitions (activity finance and management, asset ownership, rising opportunity costs, regulatory uncertainty, political, governance and legal risk, and acts of terrorism, crime and war) are drivers associated with removals and stored stocks. We would gently observe that none of them can reverse an avoided emission that has already occurred, since there is no post-issuance stock whose ownership, financing, opportunity cost or loss could release previously credited carbon. Setting a positive default in the absence of an evidence base would, in our view, risk introducing a further reduction alongside the natural component. Question 01 (the combination of natural and human-induced ratings) does not arise for this activity type if, as we suggest, both components are zero."	"In answer to Questions 02 and 03, we recommend that, for activities reducing non-renewable biomass consumption, the human-induced reversal risk factor $R_{human,i}$ be set to zero, and correspondingly that a reduction factor M_{human} not be used to support a non-zero R_{human} . Given the absence of an empirical basis and the avoided-emission nature of the activity, a zero default appears more appropriate than a placeholder positive value. We would also encourage the MEP to ensure that human-induced reversal risk does not become an additional buffer reduction for an activity that carries no post-issuance reversal liability."

Document reference number and title: (Recommendation from the MEP to SBM020)**Draft Methodological tool: Reversal risk assessment**

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)
8	Cover note	"Section 3.7 / Cover Note para 48-51 (Negligible reversal risks) A6.4-STAN-METH-007 (flexibility provisions, s.5)"	"We welcome the MEP's recognition in the Cover Note that guidance on negligible risk ""may not be relevant to activities that reduce non-renewable biomass consumption"" (para 49), that these activities are expected not to require post-crediting monitoring or remediation and to have buffer contributions cancelled at issuance (para 27), and that mechanism methodologies "may request alternatives to post-crediting monitoring" (para 49). We would respectfully suggest that these observations point towards treating the activity type as presenting a negligible risk of reversal, rather than requiring a positive buffer contribution. A consistent approach would be to classify activities that reduce non-renewable biomass consumption as presenting a negligible risk of reversal by design, so that F _{buffer} is effectively zero and the corresponding A6.4ERs can be tagged accordingly in the mechanism registry (para 50), rather than leaving each activity to seek an individual determination."	"We recommend that the tool include an explicit determination that Article 6.4 activities reducing non-renewable biomass consumption present a negligible risk of reversal, with F _{buffer,i,t} effectively zero, consistent with the flexibility provisions in section 5 of A6.4-STAN-METH-007 and with para 49. We would suggest that A6.4ERs from these activities be tagged as negligible-risk in the registry without a buffer-pool contribution, which would provide developers and buyers with helpful certainty."