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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)
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1	-	Cross cutting comment applicable to multiple sections, especially sections 1, 4, 5, Appendix 2 (Part 1 of the comment)	The relationship between forest carbon stocks and the risk or reversals does not seem to be consistent with the context of clean cooking activities. Hence, the proposed tool as well as provisions to manage the risk or reversals, in general, shall not be applicable to clean cooking activities that are based on the concept of fNRB, as elaborated below. There are several inconsistencies between (i) the terms and definitions associated with reversals, which all point to the “loss of carbon stocks” that, in theory, would have been previously credited as GHG removals and (ii) the nature of clean cooking projects, where emission reductions are not attributed to the maintenance or enhancement of carbon stocks (removals, as defined in fBuffer), but rather to the reduction of consumption of non-renewable biomass from forest carbon stocks that are not under the control of the activity participants and, most importantly, are already defined within the rationale of fNRB as already approved under UNFCCC’s Tool 33 (harvested biomass that exceeds the rate of regeneration, i.e. losses of carbon stocks, not removals). Hence, any further losses of carbon stocks after a clean cooking activity begins do not mean a reversal of credited removals nor a reversal of any type of credits or climate benefits for two main reasons: (a) Removals (enhancement of carbon stocks) are not claimed nor measured in clean cooking activities and (b) any further losses in carbon stocks (reversals) that eventually occur during a clean cooking activity will, by definition, make the ERs generated within such an activity more conservative, since they have been previously defined as per fNRB factors (fraction of non-renewable biomass), i.e. credits are only accounted for the portion of non-renewable biomass consumed and will not account for any further depletion of carbon stocks. Therefore, if fBuffer is applied to clean cooking activities it will actually “double discount” credits without any causality with the physical reality of carbon fluxes attributable to the activity. The following terms, concepts and definitions adopted in the draft tool illustrate the above-mentioned structural inconsistencies: 1) The definition of	The draft tool has made explicit the inconsistencies that arise from attempts to address the potential risk or reversals of net enhancements/removals (i.e. losses of carbon stocks previously claimed as net enhancements/removals) in fNRB based clean cooking activities (i.e. no carbon removals are claimed, as per the definition of fNRB and its factors already adopted under the UNFCCC). The solution is to exempt fNRB based clean cooking activities from the application of reversal risk assessment tools and non-permanence provisions in general (not only for the monitoring part) to avoid double discounts, not grounded in the physical reality of carbon fluxes. At last, if any carbon stocks are lost after a clean cooking activity begins, they would make the ERs claimed under such an activity more conservative as they have not been accounted for in the fNRB factor upon which ERs are generated over time.
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			Fbuffer refers to it as the “fraction of the net enhancement of storage GHGs in a reservoir resulting from the A6.4 activity” i.e. potential removals that are never claimed by a clean cooking activity, let alone the fact that are not under the control of the activity participants. As explained above, credits are based on the reduction of consumption of a fraction of non-renewable biomass defined ex-ante. So, any further losses of stocks will result in more conservative ERs, not in the reversal of any carbon benefits nor of any net enhancements. 2) The definition of reversals in the Reversals Standard, also quoted in Paragraph 20, clearly determines that a reversal occurs when the net change in storage is less than zero, i.e. when carbon stock losses occur. As explained above, clean cooking activities are not subject to such a risk because: (i) they never claim the previously enhanced stock (removals) that would have been lost and (ii) if carbon losses occur they will actually lead to an increase in fNRB and as such the activity ERs will be more conservative, as defined on an ex-ante basis. To illustrate the rationale: reversals = losses of carbon stocks = potential higher use or higher availability of non-renewable biomass (higher fNRB) = activity ERs become more conservative in the activity, as fNRB has been defined before the further losses of carbon stocks, let alone the fact that they are not controlled by the activity. 3) All definitions in paragraph 6 of the tool refer to reversals as the loss of carbon stocks, which would have to be based on previously claimed “net enhancement” (as mentioned in fBuffer) but no clean cooking activities claim net enhancements. ...continued in in the next comment...	

2	4. Applicability	Cross cutting comment applicable to multiple sections, especially sections 1, 4, 5, Appendix 2 (Part 2 of the comment)	continuation of the previous comment.... 4) To further illustrate inconsistencies, Equation 9 determines that the risk of wildfires should be factored into fBuffer. How can a wildfire be considered as a driver of net enhancement of carbon stocks? Why should clean cooking activities apply discounts in ER generation because of a wildfire that leads to carbon losses outside of the control of the project and whose stock losses will never be accounted for ER generation in the activity? Moreover, in Appendix 2, all calculations also refer to carbon stock losses and the content of paragraph 29 seems to be further contradictory: “for each result, the number in the output file represents the fraction of credited carbon in percentage that is projected to be lost to reversals from total natural risks, wildfire only, or all non-wild fire natural risks, respectively, as calculated over a 100-year period” 5) All risks of reversals defined para 37 of the Reversals Standard point to the risk of carbon losses, not net enhancements. 6) At last, the conclusion presented in paragraph 35 is not consistent. Para 35: “based on this understanding, it is appropriate to use the results developed in this report to quantify reversal risks from credited non-renewable biomass. Non-renewable biomass consumption would reduce forest carbon stocks over a given period, which is broadly aligned with the definition of a reversal used for this report”. Respectfully, this is not aligned with the concepts of reversals in this report and other Standards, as well as with the rationale of clean cooking activities based on fNRB. If in clean cooking activities credits are only claimed to the portion of non-renewable biomass, defined on an ex-ante basis as per a fNRB factor adopted in a UNFCCC tool, a further reduction of carbon stocks does not lead to any reversals of carbon benefits, by definition. They make the ERs more conservative. There is no consistency between the conclusion stated in paragraph 35 and the fNRB concepts and methodological tool referred to in paragraphs 33 and 34.	The draft tool has made explicit the inconsistencies that arise from attempts to address the potential risk or reversals of net enhancements/removals (i.e. losses of carbon stocks previously claimed as net enhancements/removals) in fNRB based clean cooking activities (i.e. no carbon removals are claimed, as per the definition of fNRB and its factors already adopted under the UNFCCC). The solution is to exempt fNRB based clean cooking activities from the application of reversal risk assessment tools and non-permanence provisions in general (not only for the monitoring part) to avoid double discounts, not grounded in the physical reality of carbon fluxes. At last, if any carbon stocks are lost after a clean cooking activity begins, they would make the ERs claimed under such an activity more conservative as they have not been accounted for in the fNRB factor upon which ERs are generated over time.
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