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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)
1	-	n/a	The tool has been designed on the basis of guidance from the Non-Permanence Standard (A6.4-MEP014-A02-APPX05), which itself remains in draft form and is currently under consultation. It is procedural inconsistent to develop and finalize a tool that is intended to operationalize a methodological standard when the underlying standard has not yet been agreed upon by Parties and is still subject to change. Advancing a near-final tool before the standard is finalized risks misalignment, premature application, and undermines the integrity of the consultation process.	The Supervisory Body should suspend the finalization of tools derived from the Non-Permanence Standard until the standard itself has been formally adopted. Tools should only be developed once the methodological framework they are intended to operationalize is stable and agreed upon by Parties. Proceeding with tool development while the standard remains in draft risks misalignment, wasted effort, and undermines the integrity of the consultation process. A staged approach is recommended: first finalize the Non-Permanence Standard through Party deliberation, then initiate tool development to ensure consistency, transparency, and credibility.

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2	4. Applicability	4.1. General requirements, 12. (a)	The tool states that “this version of the methodological tool is only applicable to Article 6.4 activities reducing non-renewable biomass consumption.” Applying non-permanence provisions to activities reducing non-renewable biomass consumption (i.e. clean cooking, water filtration, etc.) is entirely inappropriate, as these activities are based on household energy efficiency and avoided combustion rather than direct measurements of carbon stock changes. Furthermore, these activities have no control over biomass reservoirs in the areas of operation and do not claim for any enhancement or loss of these reservoirs. Thus subjecting these activity types to non-permanence provisions and buffer pool contributions is unjustified and provides clear grounds for their exemption	It is entirely inappropriate to impose non-permanence provisions to these activities as they are energy efficiency programmes and claim emission reductions based on efficiency improvements and not on changes in biomass reserves.
3	Cover note	General	According to the draft non-permanence standard, a reversal is defined as “a net loss in the storage of a greenhouse gas or its precursor for which A6.4ERs have been issued,” in simpler terms, a loss of carbon stocks. Activities reducing consumption of non-renewable biomass (i.e. clean cooking, safe water filtration, etc.), however, do not claim or quantify changes in greenhouse gas reservoirs; they generate credits from household or institutional energy efficiency improvements. These projects have no control over standing biomass reservoirs and cannot be held liable for their depletion. The parameter fNRB already addresses this issue by ensuring that no emission reductions are credited for the renewable portion of biomass. Credits are only issued for the non-renewable fraction, making results inherently conservative. Moreover, these activities do not claim increases in carbon stocks from reduced pressure on forests.	Non-permanence provisions should not be applied to projects reducing consumption of non-renewable biomass. These projects DO NOT claim removals, thus there is nothing that can be reversed.