



CALL FOR INPUT

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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	-	2	We note that the original study referenced in this section (Wu et al., 2026a) uses the following language: "we categorized a loss of carbon as a 'reversal' when a disturbance factor (for example, wildfire, drought or insect outbreaks) reduced total live carbon by more than 10% over two consecutive censuses, spanning a median interval of 5 years. This method for classifying reversals is conservative because we required total live carbon stocks to decline over two inventory measurements, which conservatively accounted for measurement error and biomass scaling uncertainty in FIA."	We recommend altering the wording of this section to either reflect this intention (i.e., requiring that a reversal be identified over the course of two periods of measurement); or, that adding language to provide guidance for cases where natural annual fluctuation in carbon stocks (e.g., in forests) exceeds 10%.
2	Appendix 2. Methods used for deriving...	37-39	This tool relies heavily on a model from a single published analysis, from a quickly-evolving field of study. We recommend that it be required, rather than suggested, that the tool is updated every two years. This is especially relevant for any analysis of human-induced risk of reversal, which can change quickly (e.g., because of a single political election).	Given the rapid pace of the science around reversal risk, the Supervisory Body shall review the reversal risk assessment tool and associated default values at least every two years. Such reviews shall assess whether new models, datasets, monitoring methods, or improved estimates of uncertainty warrant revisions to the tool or its default values.

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3	5. Reversal risk assessment	22	Re: Question 2. Default values for human-induced risk of reversal will likely be quite noisy and subject to temporal variation that will be difficult to keep up with even with regular revisions of this tool. The risks will also vary not only by GHG reservoir, but by activity type. Ideally, the modelling and data involved in this exercise would capture local-level variation relevant to a given project, making jurisdictional default factors too blunt an instrument. For example, for a REDD+ project, one source of risk might be the likelihood of state expropriation of land. This likelihood could vary significantly within a country based on factors such as land tenure types, rates of internal migration, natural resource discoveries, ethnic makeup of the area, etc. While some data exist at national levels to calculate somewhat plausible factors (World Bank Governance Indicators, Ease of Doing Business Index, etc.), this approach risks serious inaccuracy in estimating actual risk of reversal.	-
4	5. Reversal risk assessment	16	The proposed approach relies on data from a relatively high (i.e., coarse) level, and modeling of nature-based risk from a single study. This tool should include a provision that allows for approaches to risk modelling that use better-quality data and modelling that more accurately reflect risk-related conditions in the activity area.	We suggest adding a paragraph after number 16 with the following: "The default risk values provided in this tool may be used where project-specific reversal risk information is unavailable or does not meet the applicable quality requirements. Activity participants may alternatively submit project-specific reversal risk assessments that use higher-resolution datasets, locally relevant information, or more advanced modelling approaches, provided such assessments are transparent, independently verified, and demonstrate a more accurate characterization of reversal risk than the applicable default values. Where approved, project-specific assessments shall supersede the default values for the purposes of determining reversal risk and associated buffer pool contribution requirements."

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5	5. Reversal risk assessment	22	Re: Question 3. As noted above, there exist some national-level datasets which measure some variables which may be relevant for estimating human-induced reversal risk (e.g., level of corruption, history of land expropriation, etc.). These data would most likely represent a coarse, imperfect input into any risk model, but may serve as a decent first approximation. However, we recommend that care is taken when combining multiple measures of human-induced risk. Specifically, some of these measures may be endogenous to one another: if combined in a simple, additive manner, this risks a statistically biased predictor of risk, and one that likely overstates risk. For example, insights from political science have demonstrated how political institutions influence multiple relevant outcomes like democracy, rule of law, and economic performance (Acemoglu & Robinson 2005; Menaldo 2016). Acemoglu, D., & Robinson, J. A. (2005). Economic origins of dictatorship and democracy. Cambridge university press. Menaldo, V. (2016). The institutions curse: Natural resources, politics, and development. Cambridge University Press.	We strongly recommend that any approach to modelling human-induced risk include input from political scientists, economists, sociologists, and scientists from other relevant disciplines. These fields have a multiple decade history of being on the cutting edge of causal inference, and will bring the necessary insight into the selection of data and methods.