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	-	Paragraph 21	Setting the natural reversal risk reduction factor to zero by assumption is justified by the absence of jurisdiction-wide mitigation efforts (subnational, national, multinational). That justification is specific to the non-renewable biomass context, in which the reservoir is an entire region and no agent is responsible for mitigation at the jurisdictional scale. For project-based activities such as ARR, the activity is a delimited, monitored area in which the participant implements concrete and verifiable natural-risk mitigation measures (firebreaks, fire brigades, fuel management, early-detection systems, etc.). The absence of state-level public policy does not equate to the absence of project-level mitigation. Keeping M_natural at zero for ARR unduly penalizes projects that demonstrably reduce the probability and severity of natural disturbances.	We suggest that future applications of the tool to project-based activities (forestry/ARR) should not automatically inherit the setting of M_natural to zero. We propose reintroducing the reduction factor in Equation 2 for those activities, in the form: Rating_natural,i = (R_wildfire,i + R_other,i) × (1 − M_natural,i), where M_natural reflects demonstrable and verifiable project-level natural-risk mitigation measures, with magnitude grounded in evidence on the effect of mitigation on the probability or severity of disturbance, consistent with the definition of reversal risk mitigation measure in paragraph 6(f) and with the tree-thinning example for wildfire reduction already cited in footnote 7.

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2	4. Applicability	Paragraph 16 + 56	The document signals that future applications may include alternatives to the use of default values, such as a site-specific reservoir assessment, depending on the characteristics of the GHG reservoir. For ARR, the exclusive use of subnational default values is inadequate because such values derive from historical forest loss aggregated and weighted by biome stock, dominated by conversion and anthropogenic fire in risk unrelated to a fenced, monitored active restoration project. The exposure profile, growth curve and vulnerability of a native-species restoration on degraded land differ substantially from those of mature forest.	We suggest that the extension of the tool to forestry/ARR explicitly allow for site-specific assessment of reversal risk, with default values serving as a floor or reference, not as a mandatory ceiling. We recommend that the methodology distinguish active restoration from mature forest in risk assessments, allowing projects that demonstrate, through robust MRV, risk performance below the jurisdictional default to use project-specific values.
3	5. Reversal risk assessment	Questions 2+3, paragraphs 40 + 41	On reduction factors (Question 03): project-level mitigation measures should generate a positive reduction factor for human-induced risk. Equation 3 is already multiplicative and therefore already accommodates such a factor; what is absent is any basis for populating it. Verifiable measures (tenure regularization, remote-sensing MRV, community engagement and long-term contractual arrangements) demonstrably reduce the probability of human-induced reversal at the activity level and should be reflected in the rating, consistent with the definition of a reversal risk mitigation measure in paragraph 6(f). We further note a boundary problem that affects both the natural and the human rating: wildfire is treated as a natural risk, yet on agricultural frontiers a substantial share of wildfire is anthropogenic in origin. Without an explicit methodological boundary, the same reversal vector may be counted once in the wildfire component of the natural rating and again in the human rating. This is a classification issue and is distinct from the combination method addressed in our comment on Question 01: even with a correct combination method, counting one event in two terms overstates the total.	We suggest that reduction factors for human-induced risk recognise demonstrable, verifiable project-level mitigation measures, applied multiplicatively as already provided for in Equation 3. The tool should establish an explicit methodological boundary between the wildfire component treated as natural risk and the anthropogenic component treated as human-induced risk, so that a single reversal vector is not counted in both terms.

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4	5. Reversal risk assessment	Paragraph 17, Equation 1 and Question 01	Equation 1 sums the natural and human ratings, an approximation appropriate only if the terms are statistically independent. To some extent, the distinction between "natural" and "human-induced" risks may be imperfect, particularly where historical natural disturbance rates already reflect underlying human influences, such as in agricultural-frontier contexts, where natural risk (notably wildfire) and human risk (deforestation and conversion) are strongly correlated. In such cases, adding separately estimated human-induced risks to natural risks could introduce some degree of double-counting. Addition under positive correlation tends to overestimate the total buffer in jurisdictions where the risks overlap, precisely the regions of greatest interest for restoration.	We suggest that the combination of natural and human ratings incorporate a treatment of statistical dependence when the terms are correlated, rather than assuming independence by default. We recommend that the revised version specify the combination method consistently with the approach adopted to determine the human factors, avoiding excessive conservatism where risks are correlated.
5	5. Reversal risk assessment	paragraph 18 + 46	The document proposes not to apply an upper limit to the reversal risk rating for clean cooking, a decision stated without prejudice to future applications. We note that, for ARR, the decision on post-crediting monitoring is a precondition for any discussion of buffer magnitude: non-renewable biomass activities are exempt from post-crediting monitoring and remediation (paragraph 27), which removes pool-solvency implications; ARR will likely not be exempt, which entirely changes the sufficiency logic and the degree of conservatism required of the factors.	We suggest that the decision on the upper limit and on the buffer pool confidence level for ARR should be taken only after defining the post-crediting monitoring regime applicable to those activities. We recommend making explicit that the conservatism parameters calibrated for clean cooking (where credits forwarded to the buffer are immediately cancelled and there is no post-crediting monitoring) not be transposed to ARR without reassessing the solvency logic.