



Climate Land Ambition and Rights Alliance

Working Group on Article 6 activities

28 September 2026

Thank you for the opportunity to provide input to SBM 023 regarding the key issue of **reversal risks**, and its application to cookstove projects as registered under Article 6.4 of the Paris Agreement. The Climate Land Ambition and Rights Alliance (CLARA) is an international network of organizations active in the UNFCCC, IPCC, and related climate processes as they pertain to land use, forestry, and the rights and livelihoods of indigenous peoples and local communities. CLARA has an active Working Group on Paris Agreement Article 6 activities, and it is this CLARA Working Group now submitting this comment. See below for contact information for the Working Group.

2026 has been a difficult year for global forests, as the gradual impact of temperature rise is magnified by the ferocity of the current 'El Nino' / ENSO event. Many parts of the world have seen unprecedented levels of forest fire and loss. Meanwhile, recent research from California, looking at reversal risks in its compliance market, found that buffer pools created to manage these risks needed to be roughly six times larger to fully cover the expected losses in the 100-year timeframe mandated under 6.4. We appreciate the Supervisory Body's attention to the adequacy of buffer pools and to improving the reversal risk assessment tool and our comments focus on securing these improvements.

There is no question that reversal risks, and the creation of buffer pools, should apply to projects using biomass (and claiming biomass savings, as is the case with cookstoves). Specifically, the CLARA Working Group **strongly supports use of empirical data in determining the number of credits that should be placed in the buffer pool**. The SB should use empirical findings to guide its natural risk ratings as outlined in paragraphs 32-36 of the Draft Methodological Tool, while also employing a **very conservative estimate of human-induced reversal risk** which is calculated separately from, and remains additive to, natural reversal risks. We appreciate that the SB considers 'default values for reversal risk' at paragraph 25 of the most recent draft of the Methodological Tool, but we also note that in practice, *underestimation of reversal risk* is far more prevalent than overestimation, a finding bolstered by the recent empirical work done in California's forests, as cited above.

We also appreciate that the SB has considered, in the Information Note Appendix, a range of other possible approaches. In line with the reasoning of the SB, we concur that **only the Reversal Risk Assessment tool as proposed in the main text is consistent with existing SBSTA, CMA and Supervisory Body decisions** and therefore must be adopted at SBM 023.

With respect to specific project types, the CLARA Working Group argues that it is essential that the **non-permanence provisions necessary in accounting for reversals is maintained for cookstove project as well as household energy use efficiency project methodologies**. There should be immediate cancellation of buffer pool units in the case of reversals.

Further, there is no reason that methodologies for these project types should be exempted from the necessary downward adjustment (of just 1% annually) in order to ensure that the methodologies uphold the Paris Agreement and CLARA's focus on *enhancing ambition*.

While CLARA focuses primarily on land use, including bioenergy use, we also oppose the introduction of Liquefied Petroleum Gas or other fossil fuels into the cookstove methodology. Use of LPG should be excluded from the cookstove methodologies. Any promotion or 'lock-in' of fossil fuel use must be vigorously opposed. The promotion or 'lock-in' of fossil fuel use is, in fact, directly in conflict with the Paris Agreement and Article 6's stated goal of enhancing ambition.

The 6.4 Supervisory Body has an important opportunity to send a message regarding the integrity of its standards, by ensuring that a) high standards for managing risks related to *permanence* apply to all activity types involving biomass; a) reversal risks reflect actual, empirical calculations of risk from natural events, and are conservatively estimated with respect to human-caused reversals; c) forward momentum in the use of Article 6 mechanisms is maintained through gradual downward adjustments to reduce the risk of over-crediting; and d) no fossil fuel use is countenanced in cookstove and household energy projects that generate carbon credits.

The CLARA Working Group thanks you for this opportunity to comment.

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