

Our Ref: WG2280926

28th September 2026

Members of the Article 6.4 Supervisory Body

Dear Members of the Article 6.4 Supervisory Body,

Re: Reversal-risk treatment and methodological applicability -

Submission by the Project Developer Forum, ahead of SBM023

The Project Developer Forum (PD Forum) welcomes the continued work of the Supervisory Body and the Methodological Expert Panel (MEP) to establish robust, credible and environmentally sound methodologies under the Paris Agreement Crediting Mechanism (PACM).

The PD Forum represents more than 60 project developers globally. Our members are directly involved in developing, financing and implementing mitigation activities across a range of markets, including least developed countries, and therefore bring practical experience of how Article 6.4 requirements translate into implementation on the ground.

This submission responds to **A6.4-MEP016-A04** (the “Information Note”), **A6.4-MEP016-A07** (the “Reversals Tool”), and their relationship with **A6.4-STAN-METH-007** (the “Reversals Standard”), as well as the two proposed clean-cooking methodologies (**A6.4-MEP016-A01** and **A6.4-MEP016-A03**).

Clean cooking is an activity type particularly concentrated in low-income and least developed countries. It is also among the first activity types to which the proposed reversal-risk provisions would apply. We therefore encourage the Supervisory Body to consider, alongside the technical questions, the practical implications of the proposed treatment for project development and implementation in the markets where these activities are most relevant.

1. Our position on reversal risk and non-renewable biomass

The PD Forum previously raised concerns with the Supervisory Body regarding the application of reversal-risk requirements to clean-cooking activities that reduce the use of non-renewable biomass. We remain concerned that applying a reversal-risk treatment to these activities may not appropriately reflect the underlying nature of the mitigation activity.

A clean-cooking activity that reduces the consumption of non-renewable biomass avoids emissions associated with biomass combustion. The mitigation outcome is therefore fundamentally different from activities that generate or manage a carbon stock whose credited removal can subsequently be reversed.

Furthermore, the fraction of non-renewable biomass (fNRB) already provides a mechanism for accounting for the non-renewable component of biomass use, hence we suggest not to apply reversals provisions to clean cooking activities. fNRB defaults derive from models of harvest pressure and regeneration over the same landscapes to which the reversal-risk factor would apply. Whether the two instruments price the same depletion is a quantitative question, and we ask that the demonstration referred to in **paragraph 27** of the Information Note be made available.



Applying an additional reversal-risk factor to the resulting emission reductions therefore warrants careful consideration to ensure that the same underlying forest-carbon risk is not effectively accounted for more than once.

The Reversal Standard itself recognises the position of these activities. **Footnote 14**, which illustrates the condition in **paragraph 13(c)**, takes as its example a cookstove efficiency project reducing demand for non-renewable biomass, and states that neither the project owner nor the participating households have control over the forests from which the biomass is sourced. This activity type was used as the archetype of an activity without control over, or attributable effect on, the relevant reservoir. We ask the Supervisory Body to consider what follows from that characterisation for the allocation of liability, as distinct from the existence of risk. A buffer contribution deducted from the activity renders the activity participant financially responsible for land conversion, mining, illegal logging, wildfire and harvesting by third parties in respect of land it does not hold and cannot manage.

We also note that **paragraph 8** of the Reversals Standard establishes principles that guide the development of mechanism methodologies, including transparency, which requires that assumptions be stated and justified such that outcomes can be reproduced, and accuracy, which requires that bias and uncertainty be reduced as far as is practical. We therefore encourage the Supervisory Body to consider whether the proposed approach meets these principles, particularly in light of the evidentiary limitations discussed below.

2. Evidentiary basis for proposed deductions, and where the burden falls

The Reversals Tool does not fix the buffer contribution, instead the Supervisory Body is requested to choose it. **Paragraph 63** of the cover note to **A6.4-MEP016-A07** recommends selecting the human-induced risk factors from a range of 20% to 45%. The MEP is also clear about the limits of the evidence supporting these recommendations. **Paragraphs 49 to 57** of the cover note describe the human-induced risk estimates and the recommended range of 20% to 45% as matters of expert judgment. The lower bound of 20% was not quantitatively derived. The MEP could identify neither evidence on implementation of the relevant measures at jurisdictional level nor evidence characterising the effectiveness of the proposed mitigation actions.

In this context, we ask the Supervisory Body to clearly recognise these evidentiary limitations when selecting the reversal-risk values. A parameter selected as a matter of expert judgment from a range whose lower bound has not been quantitatively derived should be accompanied by a clear record of the assumptions, evidentiary basis and uncertainty underlying its selection.

The reduction factors themselves raise a further question. Under **equations (3) and (4)** of the Reversals Tool, the factors that reduce the human-induced risk component attach to whether the host Party has submitted a nationally determined contribution, a long-term low-emission development strategy and a REDD-plus submission. These are measures of reporting capacity. Their effect is that host Parties with the least administrative capacity, which are in general those in which clean cooking activities are most needed, face the largest deduction.

We ask that the suggested pairings be chosen with this in view, and that the evidentiary limits the MEP has described appear in the decision itself rather than only in its supporting documents.



3. Cumulative effects and practical consequences for project development

The proposed methodologies have resulted in several new and cumulative conservativeness provisions. This is not simply a question of credit volumes. Project developers must incur the costs of technology procurement, distribution, consumer engagement, monitoring, verification and long-term programme management, at risk, before and during credit generation. Where additional methodological discounts, risk factors and monitoring requirements are layered onto an activity, the combined effect can materially change the economics of implementation.

Paragraph 20 of the appendix of the Information Note prepared by the MEP reports that emission reductions under the two draft methodologies, before any buffer contribution, are 25 to 70 per cent lower than under comparable methodologies in other programmes.

The accounting approach also treats changes in the same reservoir differently. **Footnote 6** of the Information Note acknowledges that potential increases in biomass accumulation from reduced harvesting are not included in activity outcomes, while losses from that reservoir are charged through the buffer. **A6.4-MEP016-A01** excludes biochar removals from gasifier stoves on conservativeness grounds. **Paragraph 45 of Appendix 7 to A6.4-MEP016-A03** identifies sources of positive leakage that are likewise unaccounted for. We ask that these asymmetries be examined alongside the combined reduction in credited volumes.

The MEP has already identified the consequences: **Paragraph 72(c)** of the Information Note states that a lack of development of clean cooking activities under the mechanism would be a drawback for host Parties wishing to use the centralized mechanism under the authority of the CMA; that the countries hosting these activities are developing countries, including LDCs; and that this could be, in the MEP's words, "*a barrier to the participation of such countries*". We ask that it be given weight commensurate with the other considerations in the Note.

4. Our suggestions and requests

The PD Forum respectfully encourages the Supervisory Body to consider the following suggestions. It is worth mentioning that they do not represent an exhaustive list of our concerns regarding the usability of the proposed clean cooking methodologies and related standards or tools. Due to the short time interval between the recently released MEP documents and the upcoming SB meeting, they represent a sample of key conceptual aspects. In some cases, they also involve new approaches and bridging proposals.

4.1 Reconsider whether the Reversals Standard should apply to clean cooking activities using non-renewable biomass

Specifically, we suggest deleting "activities reducing the consumption of non-renewable biomass" from the example in footnote 4 to **paragraph 6 (a)** of the Reversals Standard, so that the alternative approaches outlined below can be assessed on their technical merits.

When losses of non-renewable carbon stocks increase after a clean-cooking project begins, the project's emission reductions become more conservative and do not represent reversals. This is



because the fNRB value applied by the activity reflects lower historical stock losses in comparison with those occurring after the increase in carbon-stock losses. By definition, this results in fewer credits (lower fNRB) in comparison with actual conditions when there are more losses of carbon stocks (higher fNRB). We could not identify a technical answer from the MEP regarding this point, which was made in our previous comments. Instead, the response referred to **paragraph 6** of the Reversals Standard, in which a footnote mentions non-renewable biomass projects as an example of activities that may be subject to reversal risks.

Since the Reversals Standard has been issued by the Supervisory Body, we understand that the SB would also have the power to amend it as part of a normal evolutionary process, including the interpretation of a footnote. We therefore encourage the SB to reconsider whether the reference to non-renewable biomass projects is appropriate in the context of clean cooking activities. The following points 2 and 3 further illustrate the basis for exempting clean cooking activities from reversals provisions.

4.2 Reconsider the premise in paragraph 26 of the Information Note regarding the loss of preserved carbon stocks

Paragraph 26 of the Information Note states that *“If all the preserved carbon stocks were lost, an activity would – cumulatively over time – not have resulted in emission reductions of CO₂”*.

We respectfully disagree with such an assertion.

Assuming that (i) more than 80% of the population in Sub-Saharan Africa, for example, still rely on wood biomass for cooking (African Development Bank COP29 Report, 2024) and (ii) there is no related technology capable of fully or substantially replacing such an amount in the near future, other sources would have to be used in the event that this unlikely scenario occurs. In the meantime, clean cooking activities would have permanently prevented the combustion of biomass defined as non-renewable through fNRB on an ex-ante basis, generating immediate benefits for a dynamic climate system.

In such case, it would be logical to assume that emission reductions will occur either through (i) the permanent reduction of household combustion of non-renewable biomass, considering accuracy and integrity gains from more frequent updates to fNRB, as suggested below, or (ii) the future use of non-renewable fuels in the unlikely case that all biomass stocks are eventually depleted. It would be reasonable to assume that the complete absence of biomass fuels would not decrease the human need for food, which in turn requires an available energy source for cooking.

Finally, and most importantly, we consider that such scenarios such as the one described in paragraph 26 are unlikely and should be considered as outliers. If similar assumptions were applied more broadly under Article 6, this could have implications for activities across several sectoral scopes. For example, if all biomass were eventually consumed in a country, the benefits associated with activities that create or maintain additional carbon stocks could also be considered to have been lost, regardless of any buffer mechanism. At the same time, the methodology already recognises that monitoring of the potential risks of “reversals” is not necessary, which suggests that such a scenario is not considered sufficiently plausible to warrant ongoing monitoring.



We are concerned that placing significant weight on such scenarios could create unintended incentives for inaction: the potential for benefits to be affected by a future, extreme outcome should not discourage action to address the underlying problem and reduce the likelihood or scale of that outcome. No individual Article 6 activity can, by itself, prevent such extreme scenarios from occurring. If they were to occur, they would likely result from broader factors beyond the control of an individual activity, including changes associated with the wider climate and environmental context. In this context, more frequent updates to fNRB, as recommended below, would provide a more direct means of improving the accuracy and conservativeness of the quantified climate benefit over time, while supporting the continued reduction of non-renewable biomass consumption.

We therefore encourage the Supervisory Body to reconsider this premise when assessing the need for reversal provisions for clean-cooking activities.

4.3 Increase the frequency of fNRB update, ensuring that changes to the availability of non-renewable biomass be incorporated into ongoing activities.

As a way of managing the accuracy of mitigation benefits associated with clean cooking, while exempting such activities from the Reversals Standard, we recommend increasing the frequency of updating the fNRB parameter **from five to three years**. Since fNRB determines the amount of non-renewable biomass available at a national/subnational level, the project would also issue fewer credits in the case of a decrease in the use of non-renewable biomass, i.e. a decrease in carbon-stock losses or an increase in carbon stocks in the applicable region.

This approach would increase both accuracy and conservativeness, without the need to apply a Reversals Standard which has been designed to address reversals of removals, which are not claimed by clean-cooking activities.

In addition to the fundamental issues outlined above, we would also like to draw the Supervisory Body's attention to several other aspects of the proposed approach that illustrate potential inconsistencies and warrant further consideration in the context of applying reversal-risk provisions to clean-cooking activities, including but not limited to:

4.4 The need to **establish a dated review** consistent with the MEP's expectation that further scientific evidence on natural reversal risks will become available within two to three years.

4.5 Addressing the **treatment of biomass accumulation** from reduced harvesting recorded in footnote 6 of the Information Note.

4.6 We ask the Supervisory Body to clearly **record the evidentiary basis and underlying uncertainty** associated with the adopted reversal-risk values. The adoption of a specific value should not be interpreted as a finding that the underlying uncertainty has been resolved, or that the value is scientifically justified independently of the methodological framework. Such assumptions and their evidentiary basis should be made explicit.

4.7 Further **explore alternative approaches 6 and 7** in the Information Note. On a supplementary basis to the approaches suggested above, alternative approach 6 (adjust other requirements for clean cooking activities) and approach 7 (exemptions based on policy) could



be further explored, in the spirit of better addressing the overall and cumulative implications of all adjustments being proposed in the context of the two draft clean-cooking methodologies.

4.8 Assess the cumulative impacts of the proposed methodological requirements before any definitive solution is approved.

Conclusion

The PD Forum supports the development of an Article 6.4 mechanism whose units command confidence and recognises the importance of maintaining environmental integrity. At the same time, environmental integrity and practical applicability should reinforce one another.

The PD Forum is concerned that the proposed reversal-risk treatment raises unresolved questions regarding its applicability to clean-cooking activities using non-renewable biomass, its interaction with existing fNRB accounting, and its cumulative impact when combined with other methodological requirements.

We therefore encourage the Supervisory Body to ensure that these issues are assessed on the basis of evidence, proportionality and the actual mitigation pathway, taking into account the diversity of activities covered under Article 6.

The PD Forum would welcome continued dialogue with the Supervisory Body and MEP on these issues and would be pleased to provide practical evidence and project-level experience from our members, including relevant third-party assessments, to support the further development of the methodologies and reversal-risk framework.

We would also welcome an opportunity for a more detailed technical dialogue with the Supervisory Body and MEP, including through an informal stakeholder workshop at the next COP, should such an opportunity be considered appropriate.

Yours sincerely,

Project Developer Forum Ltd

