An Open Letter regarding *the "Methodological tool: Reversal Risk Assessment" as applied to clean cooking activities*

17th November 2026

To: Co-Chairs & Members, UNFCCC *Article 6.4 Methodological Expert Panel* and Supervisory Body, Technical Advisory Body, *ICAO CORSIA*; Governing Board, *Integrity Council for the Voluntary Carbon Market* (ICVCM); Open Coalition on Carbon Markets, Secretariat, Board of Directors, *Gold Standard*; Board of Directors, *Verra;* Co-chairs of the *Coalition to Grow Carbon Markets*

Dear Colleagues,

We write as researchers and technical specialists in woodfuel supply, forest and woodland carbon dynamics, and greenhouse gas accounting. Many of us contributed to the fraction of non-renewable biomass (fNRB) analysis on which the Article 6.4 clean cooking methodologies now rely.

Recent developments under PACM related to clean cooking methodologies and a reversal risk assessment tool that deducts a share of each project's credits into the reversal risk buffer pool have prompted extensive discussion among the methodological expert community

There are a number of shared concerns related to the scientific basis of the tool: the tool, as adopted, does not correctly measure the risk it is meant to measure for this activity type, and in many cases, it is likely to overstate that risk.

We ask the relevant standard setting organizations in this letter to:

(1) Conduct further research and analysis on the applicability of, and methods used for how potential reversal risk mitigation tools might be applied to clean cooking technologies and crediting methodologies and defer any consideration of rules changes until the research and scientific community is able to conclude ongoing research related to these matters
(2) Ensure any future consultation and decision making processes allow ample time for adequate stakeholder engagement, consultation, and input from the full range of affected parties given the dynamic nature of research and far reaching implications of these decisions in this emerging field of inquiry.

We ask the SB of PACM to:

(1) Update the recently adopted rules by the SB related to the permanence risk tool on the basis of a landscape analysis; and
(2) Defer the deduction for clean cooking while that work proceeds.

What We Agree On

We share a commitment to sound science and environmental integrity. Reducing household demand for non-renewable woodfuel via clean cooking solutions can leave more woody biomass standing than would otherwise remain.

Research is underway to develop robust estimations of the carbon impacts of avoided wood harvesting. There’s also an active discussion about whether and how to modify clean cooking methodologies to account for the carbon stored in standing stocks of woody biomass. The authors of this letter differ with one another on whether this residual wood, and clean cooking solutions, should be subject to the Reversals Risk Tool at all. Several of us believe cookstoves are subject to reversal risk, while several of us believe they are not. This letter does not seek to resolve that question.

That said, we all agree on this: if a reversal deduction is to be applied to clean cooking, it must be calculated for land cover categories that supply fuelwood and charcoal, using geographically appropriate assumptions and parameters. The current tool adopted by PACM does not do this.

Why the Current PACM Tool Does Not Fit Clean Cooking

1. **It assesses forests, but household fuel comes from whole landscapes.** People collect fuelwood and produce charcoal wherever trees grow: farm mosaics, open woodlands, fallows, roadsides and scattered trees on cropland. Much of this falls outside any forest definition, and forest definitions themselves vary from roughly 10% to 30% canopy cover and 2-5 m a minimum height at maturity (UNFCCC Decision 11/CP.7). The tool's scope does not match the reservoir it is meant to protect.

2. **Key parameters come from the wrong ecosystem.** Several critical parameters are drawn from studies of closed-canopy, moist tropical or boreal forest.[1] Open woodlands and working landscapes differ sharply in growth rates, resilience to disturbance, and drivers of tree removal.

3. **Human-induced risk is inferred from canopy cover loss, rather than biomass loss.** Canopy-loss datasets record where forest cover falls below a threshold. They do not measure the biomass that remains or regrows on the same land. When a forest is converted to mixed, multi-story agriculture, trees are often retained or replanted, but canopy-based accounting records the conversion as a total loss.[2]

4. **Trees outside forests are ignored and regrowth is treated arbitrarily.** Trees outside forests represent a large fraction of standing woody biomass in sub-Saharan Africa, where many clean cooking projects are implemented. They constitute a major source of fuel for people in the region, and face less competition for light and nutrients and can accumulate carbon quickly. When accounting for human-induced tree cover losses, the tool adds an arbitrary percentage to allow for regrowth, with no consideration of differential growth rates based on land cover category, condition, or disturbance history.

5. **The human-induced factor is based on expert judgment and administrative capacity, not science or rigorous analysis.** The MEP described its 20–45% range as a matter of expert judgment—it is not based on science or a rigorous understanding of clean cooking ecosystems. Additionally, the human-induced risk reduction factor discounts are based not on scientific evidence, but rather on the administrative capacity of the relevant national government. In practice, they will penalise the poorest, lowest-capacity countries where the need for clean cooking solutions is greatest.

6. **The accounting bridge is missing.** Before a project carries liability for a later stock loss, the methodology should define the reservoir, its land categories, its spatial boundary, how long the obligation lasts, and what share of a landscape-level loss is attributable to one project. Neither the Reversals Standard nor the methodologies define these for clean cooking. A jurisdiction-wide risk factor cannot show that a particular stock loss reverses a particular project's credited outcome.

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[1] For example, to parameterize losses from wildfire, pests, and windthrow, the tool relied on research from temperate and boreal forest (Thom and Seidl, 2016; Whittier and Gray, 2016) and the Amazon (Bullock and Woodcock, 2021).

[2] It would help for the tool to establish the land use types, how they behave, and the accounting method in use. It is important to know if there is an understanding of the land use and land use change prevalent in the contexts where biomass pressures are reduced through the use of efficient cookstoves.

7. **The natural-risk modelling was not designed to be applied to clean cooking.** The natural-risk component is the more rigorous part of the tool: it uses biomass data and separates fire from other natural causes. Its authors have told us they did not know it would be applied to clean cooking. Natural-risk modelling could be extended across the whole landscape; however, at present, it is not. Further research and analysis would be necessary to adapt the model for clean cooking.

Consequences

Taken together, these problems point in one direction: in many jurisdictions the tool will very likely deduct more credits than the risk it is meant to cover.

Credits cancelled for a risk that has not been proven are not a conservative safeguard. They are an error, and in this context the implications of this error will fall hardest on low-income households in the Global South and least developed countries where clean cooking finance is most needed.

The precedent set by applying reversal-risk provisions to cookstove methodologies matters beyond Article 6.4. Other programmes and buyers look to the mechanism for guidance. A tool not built for clean cooking should not by default become the reference point for the wider market when it was not built for that purpose.

What We Ask

The MEP has said it will seek a mandate to revise the tool following its adoption. We ask the Supervisory Body to:

1. **Grant that mandate at SBM 024 (February 2027), with a defined scope.** The revision should cover all land types that supply household fuel, including trees outside forests; estimate human-induced risk from biomass change, not canopy loss; use regrowth rates from the published literature; distinguish woodfuel-driven removal from clearing driven by agriculture, mining or settlement; and define the reservoir, boundary, duration and proportional share of liability for clean cooking.

2. **Open the revision to independent experts.** We offer our analysis and data. A short technical workshop with the MEP and the authors of the tool's underlying studies would be a practical start.

3. **Publish the evidence for the human-induced factor** and the reasoning behind the values selected.

4. **Treat the current deduction for cookstoves as provisional, and suspend it, until the revision is complete.**

5. **Keep a pathway open for alternatives to the default tool.** The Reversals Standard (paragraphs 13–15) allows alternative approaches to monitoring, reporting and remediation where participants do not control the reservoir. We ask the Supervisory Body to confirm that this route also covers alternative ways of estimating reversal risk for clean cooking, such as landscape-wide biomass analysis or jurisdiction-specific values. Researchers, developers or host countries should be able to submit evidence-based alternatives, reviewed against published criteria and on a published timeline, without waiting for the MEP to finish revising the default tool.

We also ask the Integrity Council for the Voluntary Carbon Market, leading carbon market standards and registries programmes like Gold Standard and Verra, and the CORSIA Technical Advisory Body not to adopt this tool, or treat it as a benchmark for clean cooking, until the revision is complete.

Closing

We support a mechanism that credits real, durable mitigation and addresses risk honestly. That requires a tool built for the activity it governs. We would welcome the opportunity to contribute to its revision.

Signed, in personal capacities (affiliations for identification only):

- **Enam Akoetey-Eyiah** | UNFCCC MEP Member (2024–2026) | *UNFCCC Roster of Experts and Methodologies Expert Panel*
- **Peter W. Ellis** | Co-Lead | *Science for High-Integrity Frameworks to Transform the Carbon Market (SHIFT CM)*
- **Hilda Galt** | Partner | *Climate Focus*
- **Carlijn Nouwen** | Co-Founder | *Climate Action Platform—Africa*
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