


Dear SSC WG Chair Ms. Fatou Gaye and Vice-Chair Mr. Peer Stiansen:

Responding to “**Call for inputs on standardized baselines in SSC methodologies for displacing non renewable biomass**”, here I would like to submit my comments as follows.

Thank you very much for your kind consideration.
Best regards,


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Comments on “how to determine the fraction of non-renewable biomass”

Conclusion:

We cannot accept the mandatory use of WISDOM model.

Alternatively, I propose the following procedures:

As I explained in the first bullet below, $f_{\text{NRB}} = 100\%$ for the countries where forest is decreasing totally. The SSC WG can specify such countries as a list by using some statistics, expert judgments, submission by the host country.

Reasons:

- WISDOM model explicitly assumes that the f_{NRB} is location-specific, *i.e.*, there are very large variations within countries and regions, as its fundamental assumptions. This is NOT appropriate in the calculation of f_{NRB} . In most of the countries where fuelwood is used and forest is decreasing, fuelwood has a single (or linked) market which encompasses the whole country. It means that TOTAL demand and supply relation in the country is important. It is meaningless to consider region-specific fuelwood demand/supply in order to evaluate the carbon stock change in the country. Even if demand < supply in some area in the country, the demand reduction activity in the area implies more fuelwood can be exported to other areas where demand > supply in the country. This contributes to avoid carbon stock decrease in these areas in the country (as a sort of negative leakage effect). I consider that WISDOM model is good for REDD study or other objectives, but is NOT appropriate to evaluate f_{NRB} .

- The fuelwood is the most important energy source (especially for cooking) in LDCs. It is totally unrealistic to prepare such precise data to be used in WISDOM model in LDCs. If WISDOM model use is mandatory, it means that the related projects cannot be implemented.
- If CDM allows that the f_{NRB} is location-specific (not only by using WISDOM model but also by using other models), the related activities cannot be implemented for the poor people in the area where the f_{NRB} is zero or small number. This kind of 'bias' will cause the SOCIAL ISSUE. Since CDM is a mechanism for sustainable development, this cannot be accepted by the COP/MOP, I believe.
- In general, the poor people living in rural areas can enjoy the benefits of CDM only by reducing fuelwood use. I believe that SSC WG shall prepare arrangements for them and not limit this opportunity for them.

Comments on “default value setting for per household/per capita fuelwood consumption”:

Conclusion:

We appreciate SSC WG's effort to prepare the default value. This makes the project activities to be implemented much easier. I really wish the CDM EB's decision as soon as possible.

For the frequency for updating, we can set it as long as 10 years.

Reasons:

- The fuelwood is used for cooking purpose mainly. The energy use for cooking does not changed over time if the fuelwood is conventionally used.
- It shall be noted that the CDM project activities target the rural household which utilized fuelwood conventionally. New technologies such as ICS (improved cookstove), biogas and other fossil fuel users are not targeted by the CDM project activities (for improvement of efficiency or fuel switch). Therefore, the statistics shall not be for whole of them but focusing on households with conventional use of fuelwood only.