

**Template for comments**

<b>Date:</b>	<b>Document:</b>
--------------	------------------

**TABLE FOR COMMENTS**

**Name of submitter:** JAVIER ARISTIZABAL

**Affiliated organization of the submitter (if any):** Consultant

**Contact email of submitter:** jadaristi@gmail.com

Template for comments

Date:	Document:
-------	-----------

0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical  ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
	Paragraph 22		ge	<p>Why should the way to calculate fNRB to be changed? Certainly, it is not a matter to replace Tool 30 by another method or model, instead. The issue is using Tool 30 rightly. The new approach proposed by MP is intended to improve fNRB estimations in order to avoid overestimations of emissions reductions from mitigations projects to reduce unsustainable woody biomass use. However, conservative fNRB values can be obtained when equation 1 (Tool 30/version 04.0) is applied correctly. As stated by recent researches, fNRB is being overestimated for many countries or regions, particularly those having highly forested areas, but this is owing to a deficient use of parameters as required by equation 1. A recent study carried out in Colombia (ongoing publication) showed that fNRB varied notably depending on how renewable biomass (RB) is estimated. Tool 30 points out land areas providing woody biomass other than forest areas must be included into RB assessment. fNRB values were calculated by five subnational regions taking into account both only native forest areas and forested areas (native plus forest plantations) and croplands, delivering different results. In the scenario where only native forest was considered, fNRB values were higher as compared to those where other lands were included as part of that assessment. Thereby, inclusion of other land use where woody biomass is sourced, makes a remarkable difference to get conservative fNRB values. In the light of these findings, it seems unfair to drop an equation what still proves be useful, simple to use and effective when it is applied properly, just because it has been misused by carbon market-oriented cookstoves projects.</p>	<p>Paragraph 22 should consider possibility to propose two options for calculating fNRB: option 1) keep equation 1 as per tool 30/version 04.0 and, option 2) use the new approach as proposed by information note (CDM-MP92-A07)</p>	

Template for comments

Date:	Document:
-------	-----------

0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical  ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
	Paragraph 28		ge	Certainly, fNRB values vary across different geographical scales, so precaution must be taken of applying national-based fNRB to others subnational analysis units. In the Colombian case, national fNRB delivered a negative figure (it means, biomass 100% renewable by far) which is owing to more than 52% of country's area is forested, so fNRB assessment should be carried out on a subnational basis in order to be aware of those regional features which could affect fNRB.	No one	
	Annex 1 / Table 1		ge	Why NRB, Harvest and fNRB figures displayed for Democratic Republic of Congo in table 1 are different regarding those of table 2? Shouldn't be the same?	Proofreading figures if it is a mistake	