TABLE FOR COMMENTS

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| **#** | **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*)** |
|  |  |  |  | On 13th October 2023, the UNFCCC released **“Information note-Development of default values for fraction of non-renewable biomass, Version 01.0”** using the “MoFuSS” – a Geospatial computerized tool. This approach makes assessment of fNRB values using publicly available data, along with certain assumptions on woody biomass supply and demand, with the Geographic Information System (GIS) based MoFUSS model.  The current study conducted by UNFCCC has calculated the country level fNRB for Uganda as 38% - this indicates only 38% of the biomass consumed in Uganda is non-renewable and the rest 62% biomass is being sustainably produced. The revised fNRB values (as per this study), under values the climate impacts of high-integrity cookstove projects that are currently active in Sub-Saharan Africa, and will have adverse implications on climate justice and finance for the host countries.  For instance, fNRB value of UpEnergy’s clean cook stove project in Uganda registered under Gold Standard Carbon Programme is 89% vis-à-vis 38% as obtained by the latest MoFuSS study and this can significantly reduce the emission reductions achieved with the clean cooking project activity thereby leading to reduction in carbon finance (USD 1.5 million per annum for 100,000 beneficiaries), unless market offers a higher carbon price. |  |  |
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