November 9, 2023

Clean Development Mechanism (CDM) Methodologies Panel (MP)
United Nations Framework Convention on Climate Change

RE: Clean Cooking Alliance (CCA) submission in response to the call for public input on the information note "Default values for fraction of non-renewable biomass (fNRB)"

Dear Members of the Methodologies Panel:

The Clean Cooking Alliance (CCA) appreciates the opportunity to submit this comment in response to the call for public input on the information note "Default values for fraction of non-renewable biomass (fNRB)", as contained in MP 92 Annex 7.

CCA is grateful to CDM Executive Board and Methodologies Panel for commissioning this research to develop subnational/regional values of fNRB, and to SEI and UNAM for undertaking it.

Given the wide variability in estimates that can be generated by TOOL30, and the lack of ability to target areas of high non-renewability when using a global average of 30%, there has been a need for new data that can create full confidence among carbon offset buyers, while allowing for important geographic contextualization; this is what the revised fNRB values represent. Because this research uses a peer-reviewed model and global data set and was thoughtfully and carefully undertaken, we now have the best information on fNRB to date, which will help to bring higher transparency and integrity to the carbon market. **We support and stand behind the current research and resulting updated fNRB values as published and recommend additional complementary work.**

Using a global data set is a necessary first step and allows for harmonized inputs for different geographies. That said, using global data exclusively has limitations. In some countries/areas, there are site-specific considerations related to wood fuel supply and demand that can impact fNRB calculations beyond what modeling with global data alone can quantify.
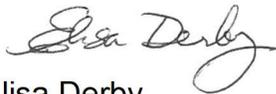
As such, CCA recommends that the CDM Methodologies Panel:

> 1. Refine this work by commissioning and integrating complementary site-specific data into the global model for key geographies with special wood fuel supply and demand considerations, (e.g. brick-making and lumber).

2. Support the development of an online version of the model that project developers and other stakeholders can parameterize with their own locally specific data, to both enhance the accessibility of the model and potentially result in more accurate estimations.

CCA thanks the CDM Methodologies Panel for its consideration of our views and looks forward to assisting the UNFCCC's work to drive integrity, credibility, and trust in the cooking and carbon markets. Please do not hesitate to reach out if you have any questions.

Sincerely,

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