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RE: Annelise Gill-Wiehl in response to the CDM-MP92-A07: "Information note: Development of default values for fraction of non-renewable biomass (v1)"

Dear Members of the UNFCCC Methodologies Panel,

My name is Annelise Gill-Wiehl and I am a Ph.D. candidate at the University of California, Berkeley in the Energy & Resources Group. I have over 7 years of experience on the ground in rural Tanzania working on clean cookstove projects and over two years of experience researching the quantification of cookstove offsets. With Dr. Barbara Haya and Dr. Daniel Kammen, I have conducted the first over/under crediting analysis of cookstove offset methodologies. I appreciate the opportunity to submit this comment in response to CDM-MP92-A07: "Information note: Development of default values for fraction of non-renewable biomass (v1)."

In particular, I would like to comment on Section #33: "The MP will also continue to review the current requirements of TOOL30 and propose improvements through a revision to TOOL30.

In our common goal to ensure that "the fraction of non-renewable biomass (fNRB) value applied is reliable and conservative and based on the latest data and information," I stress that I hope that the Supervisory Body (SB) will:

(1) Adopt (and thus enforce projects to adopt) the newly released values for fraction of non-renewable biomass (fNRB) for Article 6.4.
(2) Eliminate the option for projects to continue to use even a revised TOOL30.
(3) Require updated fNRB values each monitoring period to align with current science.

The MP92's MoFuSS (Modelling Fuelwood Sustainability Scenarios) analysis represents the leading science on fNRB and best method and values we have to date, obtained through peer-reviewed, transparent, accessible open-source software. I applaud the UNFCCC for commissioning this work and the third-party experts on their incredible effort. Now, we must honor it.

Specifically, I recommend that projects must use the fNRB value from the MP92's MoFuSS analysis at the most granular (location specific) level, but projects with a national scope or those using charcoal that has a national market, might choose a national figure. I also recommend that projects must update this fNRB value at each monitoring period (to ensure that the generated offsets reflect the most up to date value).

MP92-A07 clearly outlines differences between TOOL30 and the approach in MoFuSS. MoFuSS runs multi-year simulations which compare intervention (i.e., actions to reduce extraction on non-renewable biomass such as through efficient cookstove projects) and non-intervention scenarios that incorporate dynamic variables like population growth, urbanization, and land cover change. In its current form, TOOL30 does not factor in biomass at the pixel level, land cover heterogeneity, protected areas or physical accessibility.

By continuing to allow projects to use TOOL30 or other less robust methods when MoFuSS values exist, developers are forced to choose between science or generating excess offsets and thus potentially more revenue.

There is no incentive to follow the science. The developers' incentives are evident, as robust WISDOM fNRB values have been published for eight years (previously the most robust approach—which MoFuSS builds on), yet all projects have opted to use higher TOOL30-derived or default values.

It is imperative that the methodologies enforce accurate or conservative estimation, which starts with the most robust fNRB values we have to date.

I fully support further updates as new global datasets and assumptions become available in the coming years.

These new MoFuSS fNRB values, however, represent the latest, most robust approach the scientific community has to date. In continuing to allow for flexibility and not enforce these values, we risk destroying all faith in the quality of cookstove offsets and the ability to improve the system. The carbon market is at an inflection point; the methodologies must reflect their commitment to science and quality offsets. The future of the market, and the long-term financing of all Sustainable Development Goals depends on it.

Thank you for considering my view and I would be happy to assist any way I can 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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