

8 November 2023

**RE: UNFCCC [call for public comment](#) on *Information note: Default values for fraction of non-renewable biomass (fNRB)*, [CDM-MP92-A07](#)**

Dear Article 6.4 Methodology Panel and CDM Executive Board:

First, thank you for supporting substantial research into fNRB values for use by Article 6.4 methodologies. Thank you also for this opportunity to review and comment on the resulting report.

**I'm writing in strong support of the mandatory use of the new fNRB values developed using MoFuSS by all UN cookstoves crediting projects. These are the most accurate figures to date.**

Given the quality issues that have led to deep distrust and price volatility carbon offset markets to date, and increasing scrutiny that the Article 6.4 market will be under, a trusted, effective, and stable market will need to be based on a commitment to science. MoFuSS provides the most accurate figures to date.

The University of California, Berkeley Carbon Trading Project is dedicated to the rigorous interdisciplinary study of carbon offset quality. Our assessment of the quality of credits generated by improved cookstove offset methodologies, Gill-Wiehl et al. (2023), described in more detail at <https://gspp.berkeley.edu/research-and-impact/centers/cepp/projects/berkeley-carbon-trading-project/cookstoves>, is the first comprehensive quantitative over/under crediting analysis of a set of offset methodologies.

We found that fNRB was a significant source of over-crediting for all improved cookstove offset methodologies. In addition, in all methodologies except for Gold Standard's Metered & Measured methodology, the methods used to monitor stove adoption, usage, and stacking (the use of multiple stoves) rates are another important source of over-crediting. Please see the preprint and our website (links below and above) for a full set of recommendations on how to ensure the quality cookstoves offset credits.

What the UNFCCC decides on fNRB and other similar issues will determine trust in, and effectiveness of, the new UN offset market. I hope that you will make methodological decisions that will result in, once and for all, a quality market, that can also guide other carbon markets.

Most sincerely,  
Barbara Haya

Research Fellow, Goldman School of Public Policy  
Director, [Berkeley Carbon Trading Project](#)  
University of California, Berkeley  
bhaya@berkeley.edu

Works cited: Gill-Wiehl, A., Kammen, D., & Haya, B. (2023). *Cooking the books: Pervasive over-crediting from cookstoves offset methodologies* [Preprint]. In Review. <https://doi.org/10.21203/rs.3.rs-2606020/v1>