TABLE FOR COMMENTS

Name of submitter: Esther Adams

Affiliated organization of the submitter (if any): Proyecto Mirador LLC

Contact email of submitter: eadams@proyectomirador.org

| **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*)** |
| **N/A** | **N/A** | **N/A** | **Ge** | The fNRB values proposed in the Info Note are low enough to put many carbon financed cookstove projects out of business, obviating the only viable means for them to provide economic, social and health benefits to the poorest of the poor.  The UNFCCC has given only two weeks to comment. An intelligent and balanced response will require a deep dive into the hard science and can only happen with help from a diverse group of scientists and academics. If the scientific community is to perform a fair analysis, two weeks is not enough.  The future of carbon cookstove projects cannot rely on the work of a small handful of scientists without considering alternative perspectives and multiple approaches. We respectfully request that the comment deadline be extended to 30 April 2024. | We recommend the comment period be extended from 10 November 2023 to 30 April 2024. |  |
| **p. 18** | **Para. 5** | **1** | **ge** | The report acknowledges that “MoFuSS relies on several dozen parameters to model land cover change associated with fuelwood harvesting.” Many of those parameters are in turn based on estimations and uncertain variables. With such a large number of assumptions, it is impossible to achieve precision. However, the fNRB figures in this report will be — and in some cases, already are being — regarded by ratings agencies, carbon buyers, and the media as factual, creating a real risk that carbon financed cookstove projects will lose their funding and cease to exist. The underlying assumption that precise fNRB figures are possible to determine has ultimately fed the narrative that carbon projects are universally bad. We ask that the CDM MP & EB clearly acknowledge the risk of inaccuracy in calculating fNRB using MoFuSS by adding the proposed verbiage. | Proposed text:  *MoFuSS relies on several dozen parameters to model land cover change associated with woodfuel harvesting, many of which are estimated, precluding the possibility of precision in the final result.* |  |
| **p. 28**  **p. 29** | **Para. 1**  **Para. 2** | **1**  **1** | **Te** | The MoFuSS tool used a default wood fuel consumption value of 0.4 tonnes per capita to calculate regional values globally, resulting in artificially low fNRB values. The differential between default and actual values varies by region. Central American households, for example, consume an average of nearly 3 times the default fuelwood consumption figure used in the assumptions for the UNFCCC analysis, introducing an inaccurate discount.  Biomass consumption data are included in the DHS and Census survey data of most host countries. Additionally, most carbon financed cookstove projects publish verified fuelwood consumption data in their public documentation for carbon certification and issuance. It is, therefore, reasonable to expect the MoFuSS analysis to include regionally appropriate fuelwood consumption values in the calculation of fNRB.  We ask that the CDM MP & EB allow Host Countries and Project developers to use nationally approved data sets to augment or supersede the MoFuSS data models where applicable. | Proposed text:  *The CDM MP shall consult directly with Host Countries on the estimation of demographic and wood fuel consumption data, forestry data and charcoal supply chain data.*  Proposed text:  *The quantification of demographic and wood fuel consumption data can be sourced from updated Host Country approved DHS or Census data.* |  |