**Comments on: Info note: Default values for fraction of non-renewable biomass (fNRB)**

Firstly, I think the initiative to create more localised default values is much needed and a great step forward for improving project integrity. The current 30% default value is almost never used, and is too standardised to take into account the wide local variation across and within countries for what fNRB should be.

There are a few suggestions for how to maximise the impact of this modelling technique and these default values going forward:

* **Alignment with New Methodologies:** It’s important that the provision of updated default values is not separate from any other methodological updates and guidance for projects that don’t want to just use these default values. Ensuring that the model is an open one, and updated methodologies align with this approach is important. Some of the standardised inputs (eg around consumption per capita) could create inaccuracies at the local level, and therefore projects may not want to use the default values. However, in this case, it is critical that any updated cookstove or relevant methodologies align with this same modelling approach, then projects can still use their own inputs regarding consumption per capita where justified and robustly evidenced, and have some consistency to the default values.
* **Ranged / Maximum Values:** We have spoken to others in the market before about not just providing default values, but providing ranged guidance (eg upper bounds that can be used). There is clearly going to be local variations even within the pixel approach, but having guidance on what the realistic bound of these variations could be. For example, if the default value for a locality is 45%, how realistic is it for this to reach 80% within very small communities within the locality?
* **Satellite Imagery:** The use of geospatial techniques can help to validate the extent to which these projects slow and reduce the amount of deforestation and degradation around the area by analysing carbon stocks and land use change in proximity to a project area.
* **Updating Process:** From experience with other project types in the carbon markets, it is critical that there is a process in place to ensure these values are regularly updated as we have seen many occasions of default values becoming quickly outdated. Underlying data inputs can change materially in short periods of time, and the default values should be set up with a clear procedure for when / how they will updated.

Thanks,

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