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TABLE FOR COMMENTS

Name of submitter: Christian Ehrat (Director, VCS Methodologies)

Affiliated organization of the submitter (if any): Verra

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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)
1	17	1 and 2	te	In more industrialized developing countries (that rely less on fuel wood for cooking/heating purposes), the demand for wood from formal/cottage industries and commercial establishments could be higher than 10% of the overall wood harvest.	The Secretariat may consider including a conservative default factor (possibly, the lowest fraction of total wood harvest in non-SSA countries) to account for the demand for wood from formal/cottage industries and commercial establishments in such non-SSA countries.	
2	20	9-11	te	Keeping a fixed friction value of 90% seems high, given that the frequency of intrusions into protected areas may vary across countries	The Secretariat may consider using a range of friction values (rather than keeping a single, fixed value) which would be dependent upon several inherent factors like safety/rule of law, human development, economic growth etc. Please refer to Dehmel et al. (2022)) and the Ibrahim Index of African Governance (IIAG) .	
3	25	1 and 2	te	The definition of the term "project area" seems imprecise and would be open to interpretation from Activity Developer, which could lead to non-uniformity in its usage.	The Secretariat should provide some guidance (in a standard or tool document) on how an Activity Developer should identify the relevant "project area" within the context of their standalone activity/PoA as it is key to determining the right f _{NRB} value.	
4	33	1 and 2	ge	Please clarify if the original version or a revised version of the TOOL30 will still be permitted as an alternative option to determine f_{nrb} .		
5	10	1-6	ge	It states that "Subject to guidance from the Board, work will continue to be conducted for the remaining countries/regions in the world; with the possibility of further updates given new global datasets and assumptions become available in the coming years."	It is unclear how projects in countries in other regions could be credited if global datasets are not provided. Please clarify.	

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6	N/A	N/A	ge	We understand that the approach to determine fnrb default values is conservative.	Can you clarify the following: (1) Does this approach include uncertainty deductions? (2) If so, do you have an estimate of the uncertainty of the default values, or how conservative they are?	