TABLE FOR COMMENTS

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Template for comments

Date:	**Document:**

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*)**

10	5	31	te	At MP92, held between the 4th and 6th of October 2023, the CDM Methodology Panel released its meeting report, including Annex 7 to that report with a published information note on the default values for fraction of non-renewable biomass. The MP subsequently confirmed a three week public comment period starting 13 October through 3 Nov 2023. The fNRB computation approach defined in the Information Note represents a significant shift from the current approach for calculating fNRB (currently based on the approved CDM Tool 30). The information note bases the new fNRB calculation on the Modelling fuelwood savings scenarios (MoFuSS) model. The MoFuSS tool is a a complex GIS modelling tool that has been in varied forms of development since September, 2011. The tool and the assumptions that it draws upon are complex and its conclusions will have far-reaching implications on the crediting for cookstove carbon projects. As such, the three-week public comment period allotted by the MP does not permit sufficient time for robust academic review or governmental comment. Globally, 2.4 billion rely on polluting cooking fuels and technologies, representing an urgent environmental, health and socioeconomic crisis. Emissions from burning wood fuels account for 3% of global emissions, akin to the impact of the aviation industry. Achieving universal access to clean cooking by 2030 will require an estimated $8-10 billion annually. Current commitments stand at a mere $130 million each year. While clean cooking projects have helped millions gain access to clean cooking fuels and technologies in the past decade, the absolute number of people without access to clean cooking is outpacing the rate of growth. Carbon market funding has proven essential for scaling access to clean cooking, especially to poor, rural households in Sub-Saharan Africa and Southeast Asia. fNRB numbers have a marked effect on credit issuance. Fewer credits issued impacts the necessary finance and verification of cookstove interventions.	In consideration of the wide-spread implications of the new fNRB estimation model, we recommend the comment period be extended from 13 October to 26 of January 2024 to allow for broader participation of Government stakeholders, private developers, academic and NGO actors active in the clean cooking sector. Proposed text: In response to stakeholder comments, the committee will extend the deadline for commenting on fNRB from 2 November 2023 to 19 January 2024.	

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