TABLE FOR COMMENTS

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| **0** | **1** | **2** | **3** | **4** | **5** | **6** |
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| **#** | **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** | N/A | N/A | ge | The subsequent work and timeline for public comment is 13 October to 10 Nov 2023. The fNRB calculations and assumptions are complex, took years to develop, require 52 pages of methodological explanation and will have an enormous impact on the crediting for cookstove carbon projects. Allowing just a short time for response does not permit sufficient time for scientific review or governmental comment. | We recommend the comment period be extended to 26 of January 2024.Proposed text:The call for inputs from stakeholders is open from (13 October to 26 January 2024, 23:59 CEST). |  |
| **2** | 3.2.2 | 17 | te | The model focuses primarily on residential wood fuel demand and does not count wood harvesting for any other purpose.There is substantial use of woodfuel for other purposes (lumber including waste, brick kilns, industrial uses, etc.) and to ignore this aspect of consumption is inaccurate. If primary data is lacking, including conservative assumptions is much better than ignoring the source of consumption entirely. | Include alternative sources of demand.  |  |
| **3** | 3.2.1 | 14 | te | Comparing consumption and regrowth in a specific area may provide skewed results since regrowth may not take place in the area where consumption occurs. While there is an algorithm embedded in Mofuss to account for transport of biomass, it isn’t clear that the one size fits all approach accurate. This explains why the default values for most African capitals are so far from what one would expect. | Fundamental MoFuss methodological issue and not pertaining to a specific part of the text. Propose methodological revision before the tool can be launched.The tool should have the ability to couple supply from one location with demand from another. |  |
| **4** | Appendix 2.Pg 25 | subscript 2 | te | Stove stacking is exceedingly common in households cooking with biomass, especially in Africa. Not accounting for stove stacking, and only counting households that are primary wood and charcoal users leads to a significant underestimate of baseline fuel consumption. The reason cited was that such data is not available, however, making conservative assumptions rather than not counting any fuel use among households stacking does a disservice to host countries by artificially lowering fNRB values. | Fundamental MoFuss methodological issue. Propose methodological revision that takes into account stove stacking before the tool can be launched. |  |
| **5** | Appendix 2.Pg 26/27 | Whole section | te | Three potential methods were chosen to quantify fuel consumption per person. The UNFCCC default of 0.4 t/yr wood and 67kgs/yr for charcoal was chosen as it was found to be “between the two other methods” of the three. However, the methods used to quantify the others also greatly under-estimated fuel consumption by assuming 15% and 25% thermal efficiency for wood and charcoal respectively. These efficiencies can only be attained by closely tending fires, extinguishing unspent charcoal before it burns to ashes, etc. In short, they are laboratory results, and results we consistently observe in the field are much lower than this.The method that took averages of all CDM projects included multiple non-African regions (which have much lower consumption) even though the study scope is limited to Africa, thus bringing the average of all CDM projects down significantly.So the methodology makes it seem like a middle ground has been chosen, when in fact the UNFCCC default isn’t a middle ground at all, and in fact grossly under-estimates fuel consumption compared to real world situations in SSA. | We strongly recommend the researchers use to most appropriative country-specific woodfuel consumption values based on any official statistics or UN data or through localized surveys etc.Proposed text:“The region-specific woodfuel demand is estimated based on consumption statistics as per reliable sources such as regional studies, official statistics, UN data, localized surveys, registered PDDs, host country published default values, etc.” |  |
| **6** | Appendix 2.Page No – 22/67Para No - 1 | 7 | te | **Biomass Growth Functions** The work cites biomass growth rates from the IPCC’s 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories to estimate the annual biomass growth potential. As per IPCC, the forests are categorized into 3 heads considering their age, Primary, Secondary >20 years and Secondary ≤ 20 years and their respective growth rates were published for various ecological zones. The Table 4.12 of 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (Volume 4: Agriculture, Forestry and Other Land Use) highlights the aboveground net biomass growth rate for these 3 age categories, wherein the growth rate for Secondary Forest ≤ 20 years is much higher than that of Primary Forest and Secondary Forest >20 years. Importantly, the work only considers growth rate of Secondary Forest ≤ 20 years for the value of rmax to calculate the biomass availability (supply). This raises the following points:1. If forests in SSA are anything other than the fastest growing category of secondary forest, this approach would dramatically inflate the regrowth potential and availability of renewable biomass and provide us a false indication rate of forest depletion.
2. No evidence has been presented that only Secondary Forest area ≤ 20 years are harvested by the local population for firewood merchants & charcoal producers, and our field experience suggest this not to be the case.
3. If we assume that Primary Forests are found primarily in protected areas, then how can the model assume both that there is a 10% likelihood that wood is harvested within a protected area AND that the regrowth rate is sourced exclusively from Secondary Forest areas ≤ 20 years? The two approaches are contradictory.
 | We strongly recommend the researchers use the aboveground net biomass growth rates as defined by the IPCC’s 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories specific to the respective age category of the forest types to determine rmax in order to apply a more realistic regrowth capacity. Also, the split of various forest age categories should be sourced from the relevant host countries and applied in the calculation.Proposed text:“*Aboveground net biomass growth rate data are provided across three age categories: “< 20 years after disturbance or establishment”, “> 20 years after disturbance or establishment”, and “primary” or mature stands. We use the respective growth rate values and rmax considering the age of the forest cover in order to realistically estimate the biomass availability*” |  |