TABLE FOR COMMENTS

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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** | **5, page 10** | **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 fNRB 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**](https://www.iea.org/reports/a-vision-for-clean-cooking-access-for-all)**. Current commitments stand at a** [**mere $130 million each year**](https://cleancooking.org/funding-opps/invitation-to-undertake-detailed-analysis-of-the-carbon-markets-landscape-for-clean-cooking-identification-of-the-risks-and-opportunities-in-kenya/#:~:text=Each%20year%2C%20the%20clean%20cooking,%2C%20environmental%2C%20and%20economic%20impacts)**. 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 26 January 2024.** |  |
| **2** | **3.2.2, page 6** | **17** | **te** | **The model focuses primarily on residential wood fuel demand and does not count wood harvesting for any other purpose.** | **Include alternative sources of demand in the model.**  **Alternative Text:**  **The model has been modified to include alternative sources of demand** |  |
| **3** | **Appendix 2, page 16** | **What is fNRB** | **te** | **The definition of fNRB is the amount of wood harvested above the landscape’s natural rate of regeneration.**  **Estimating the landscape’s natural rate of regeneration in a specific location is impossible without a thorough ground study to quantify “reachable harvesting area” and a categorization of the woody biomass types and a sophisticated evaluation to determine whether the consumption of woody biomass is greater than the incremental biomass growth over a long period of time to inform estimates.**  **The entire model for fNRB is complex with a large number of variables, some of the variables reliant on old data, or on variables built on a series of other assumptions, that it cannot provide a reliable estimate of non-renewability of the wood supply.** | **Request a review of alternative discount factors that can be applied to cookstove project credits that provide a straightforward means to ensure projects are not over crediting or a Tool with which projects can perform independent calculations.**  **Perhaps Household reliance on biomass consumption for energy needs can be considered as a default factor. Perhaps a risk evaluation similar to a buffer pool review, can be performed and audited to determine the non-renewability of the fuel. This could include reachability of wood source, country rate of deforestation/degradation, time spent gathering fuel, trends in wood prices, type of biomass collected and used, etc.**  **Proposed text:**  **The UNFCCC seeks proposals for an alternative to the fNRB default factors.** |  |
| **4** | **Appendix 2, page 22**  **Page 36** | **Paragraph 5**  **Use of deforestation by products** | **te** | **The model can simulate future tree cover loss that might be caused by drivers unrelated to woodfuel demand, such as agricultural expansion.**  **It can be assumed that if woodfuel is generated by agricultural expansion, it eliminates gathering of woodfuel in other reachable harvesting areas. Agricultural expansion that delivers woodfuel for consumption should contribute to non renwability.** | **Include agricultural expansion woodfuel in the model as contributing to non renewability.**  **Proposed Text**  **The model will be revised to include woodfuel from agricultural areas in the non-rewability category.** |  |
| **5** | **Appendix 2, page 26** | **Quantifying Consumption** | **te** | **It is noted that LAC countries vary dramatically in average annual consumption of woody biomass per person vs other areas of the world. Applying an average to the simulation unfairly punishes LAC countries.** | **Determine how to manage the simulation allowing for differences in country consumption.**  **Proposed text:**  **The model will be revised to accommodate variability in annual consumption of woody biomass per person.** |  |
| **6** | **Appendix 2, page 37** | **Paragraph 1** | **te** | **For this assessment, friction was increased by 90% which means that the likelihood of wood harvesting from protected areas was only 10% that of unprotected areas with similar terrain.**  **We suspect that harvesting of woodfuel from protected areas is much higher than this assumption.** | **Review “friction factor,” all protected areas are not equally difficult to access for both self collection and commercial extraction.**  **Proposed text:**  **We will review harvesting of woodfuel from protected areas.** |  |
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