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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*)
3	4	24	ge	The Executive Board (EB) of the Clean Development Mechanism (CDM) has taken a commendable step in enhancing the process for estimating non-renewable biomass, aiming to minimize uncertainties in greenhouse gas (GHG) avoidance calculations for clean cooking and water purification projects. The extensive use of biomass in Africa for domestic purposes severely impacts the continent's natural ecosystems and contributes notably to global GHG and Black Carbon emissions. Clean cooking is integral to many African countries' national climate action plans, with many Host Countries actively establishing regulatory frameworks for carbon offset trading to support both compliance and voluntary markets.	We recommend the comment period be extended from 10 November 2023 to 30 April 2024. Proposed text: *In response to stakeholder comments, the committee will extend the deadline for commenting on fNRB from November 2023 to 30 April 2024.*	

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				However, the adoption of the Modelling Fuelwood Savings Scenarios (MoFuSS) tool, still in varied stages of development since 2011, requires careful consideration. The tool, which is complex and GIS-based, has only been analysed for 43 African countries, with further studies for Asian and South American markets pending. African Host Countries need substantial training to utilize MoFuSS effectively, align it with their GHG inventories, and reconcile any discrepancies between the tool's data and their own. Without dedicated training, these countries may be forced to accept default values without fully understanding them, potentially leading to future disputes. The push for universal clean cooking access by 2030 requires significant investment, far exceeding the current financial commitments. Carbon market funding is crucial for expanding clean cooking access, particularly in poor and rural areas in Sub-Saharan Africa and Southeast Asia. The fNRB (fraction of Non-Renewable Biomass) calculations significantly influence credit issuance, which is vital for financing and validating cookstove projects. Any adjustments to the fNRB to prevent over-crediting must be carefully balanced to avoid under-crediting, which could hinder private sector engagement in addressing the widespread use of non-renewable biomass. It is urged that the CDM MP & EB provide comprehensive capacity building and prolong the public consultation period to allow African Host countries ample opportunity to contribute their insights.		
28 29	**Paragraph 1** **Paragraph 2**	1 1	te	The MoFuSS tool, estimates non-renewable biomass primarily as a function of population data and estimated fuel consumption metrics. Notably, the use of default wood fuel consumption of 0.4 tonnes per capita, as homogenized estimation of wood fuel demand across the continent. The tool also relies on 2018 UN data for demographic distribution, which is not an accurate representation of demographic data 5 years since, and which admittedly lacks specificity in sub national geographical data. An opportunity here exists for Host Countries to provide more accurate demographic and biomass consumption data as both variables are tracked to varied degrees in most Host Counties DHS and Census survey data.	Proposed text: *The CDM MP shall consult directly with Host Counties on the estimation of demographic and wood fuel consumption data, forestry data and charcoal supply chain data.* Proposed text: *The quantification of demographic and wood fuel consumption data can be sourced from updated Host Country approved DHS or Census data.*	

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				Host Countries should also provide data on forestry biomass stocks. Host Countries maintain data on protected and non-protected forest biomass depletion and regrowth rates over a long time period which should be incorporated into the modelling of renewable biomass using the MoFuSS tool. Host Countries are primarily tasked with the protection of these biomass stocks and should be able to provide meaningful contributions to their estimations and contributions to national and regional fNRB estimates. We implore the CDM MP & EB to consult directly with Host Counties and afford Host Countries and Project developers the option to use nationally approved data sets to augment or supersede the MoFuSS data models where applicable.		