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*)** |
| **10** | **5** | **31** | **te** | 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 21 working days for response does not permit sufficient time for scientific 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. | We recommend the comment period be extended from 13 October to 26 of January 2024.Proposed text:*In response to stakeholder comments, the committee will extend the deadline for commenting on fNRB from 10 November 2023 to 19 January 2024.* |  |
|  | **3.1** | **3** | **Ge** | fNRB impacts carbon projects and methodologies beyond just cookstove projects | Include other project types and methodologies.Proposed text:*CDM programmes of activities (PoAs) include many project types which reduce consumption of non-renewable biomass**(List methodologies)* |  |
|  | **3.1** | **5&6** | **Te** | Presumably there was no intention that the 0.3 ‘global default’ would ever be used in project-specific applications. It represents the least accurate way of assessing this parameter value at the project level. Stating that the other two options “yielded much higher and therefore less conservative values of the *fNRB”* completely neglects to mention the vital importance of accuracy in the calculations and positions this paper in the wrong way – i.e. that anything over 0.3 is not conservative; rather than discussing the more important aspect of accuracy. If we prioritize conservativeness over accuracy, then why not a default fNRB value of 0.2 or 0.1? | Include the vital component of prioritizing accuracy in assessment of the parameter value, which is of higher importance than just pure ‘conservativeness’. Greater accuracy can be achieved by assessing the parameter value at the sub-national, project level.Proposed text:*5. The current default value of 0.3 that can be applied globally was adopted by the Board at its 97th meeting as a conservative default, taking into account literature available at that time, however it is acknowledged that this is the least accurate approach to calculating project-level fNRB**6. Over time, it became apparent that this universal default value of 0.3 has seldom been applied in CDM projects and PoAs owing to this clear lack of accuracy obtained from a global default. Instead, most projects employed either of the other two options which yielded higher, yet more accurate and project-specific, values for the fNRB Most projects adopted the most recent version of CDM Tool 30 in accordance with methodological requirements.* |  |
|  | **3.2** | **11** | **Te** | Accessibility is not accurately modelled in the new values. This is where project level assessments can be more accurate. Although some biomass may be considered by the model as ‘theoretically’ accessible, in reality it is not. Remote, rural villages collect woodfuel according to accessibility (i.e. they gather the nearest first), and in this context the proportion of what is collected that is renewable is extremely low. People do not harvest wood in a managed way. It is harvested according to need and the need is closest to areas of human habitation, where pressure on standing biomass is most intense. This is where most cookstove projects also take place. It is totally conceivable that 80-90% of locally harvested wood fuel is non-renewable. Also, how can charcoal and wood fuel both have the same default fNRB value as the accessibility is entirely different; one fuel is purchased from a market and one fuel is collected locally. | Allow for variable accessibility rates dependent on project-specific conditions. Adjust calculations for fuel types; e.g. charcoal vs. wood.Proposed text:*d) Neither approach adequately makes a localized assessment of where biomass for different fuel types is sourced. Rural villages using wood fuel are more likely to source the nearest available fuel in an unmanaged way; leading to high levels of localized fNRB. Whereas, biomass for charcoal may be sourced from an entirely different region and, quite frequently in Africa, from across international borders. It is very difficult to see how a ’unified’ fNRB is applicable for al fuel types in one particular region.* |  |
|  | **3.2.1** | **13,14,15** | **Te** | This section gives no context for forest degradation. It does nothing to differentiate the carbon storage potential of new growth trees and saplings vs. old growth trees. Theoretically the model could allow for total denuding of old growth trees in an ecosystem favour of replacement by young saplings or alien invasive species; and still retain the same fNRB. What looks to be a forest from a satellite may actually be a heavily degraded landscape. | Locally-sourced data on a project-basis can inform the degradation of forests caused by wood harvesting. This would change the profile of the fNRB used by households. Proposed text:*The model neglects to accurately account for forest degradation. Satellite images may show ground cover and attribute the same carbon sequestration value to this as in old growth forests; where this is clearly not the case. Extensive localized harvesting is taking place can have a significant impact on fNRB which is not accounted for in the model; whereby increasing the uncertainty of the calculations. Localized, project-base data can improve accuracy.* |  |
|  | **3.2.2** | **16** | **Te** | This is a very crude assessment of fuel use at the household level. Project developers conduct far more rigorous assessments of fuel use at the household level in their baseline assessments.  | Allow for more accurate, localized project-level assessments of biomass fuel use.Proposed text:*Project developers should be allowed to employ project data to inform he fNRB calculations for their project area. Baseline assessments of fuel use can be utilized in the calculations to improve accuracy.* |  |
|  | **3.2.3** | **21** | **Te** | Previous modelling by the same authors, suggested that the fNRB for the Caprivi Strip in Namibia has an fNRB of 83.1%. The only factor that distinguishes this area from neighbouring regions in Zambia (Western) 33% and Botswana (Chobe) 45.3% and Botswana (Ngamiland) 47% is the fact that it is enclosed by national boundaries. So, the authors’ own studies acknowledge that, where wood fuel collection is localized (here limited supposedly only by national borders), high levels of fNRB are possible in line with many Tool 30 assessments. As project developers operating in these regions, we do not see the wood collection behaviour of villages in the Caprivi Strip to be any different to neighbouring villages in Zambia or Botswana. The national boundary is artificial in this context, as households fuel collection habits mean that they simply collect wood fuel from the nearest available location. So, villages in Zambia do not travel excessive distances to collect wood fuel, they simply obtain the closest available fuel. This practice is inherently unsustainable and leads to very high localized levels of fNRB in collected fuel on both sides of the border. | Allow for more accurate, localized project-level assessments of biomass fuel harvesting.Proposed text:*Localized Biomass Harvesting**The model does not account for localized collection and use of biomass which can be inherently unsustainable. Project developers can assess during the baseline stage the accessibility of biomass and how biomass is harvested to improve accuracy of the fNRB in harvested biomass. This can be based on assessments of how far households must travel to collect wood fuel, for example.*  |  |
|  | **3.3** | **28** | **Ge** | Understanding the high variability of fNRB is crucial in its assessment. The authors rightly state that “countries have sub-national units with large differences in population density and accessibility. So, we see high NRB (in) close proximity to populated regions and low NRB in the unpopulated regions.” This potential for high-levels of fNRB close to populated human habitation is not accurately captured in the modelling and can only be achieved via localized, project-level assessments. | Allow for more accurate, localized project-level assessments of biomass fuel use and harvesting.Proposed text:*It should be recognized that the inherent variability of fNRB is not represented by the model, and that project-level studies can increase the accuracy of the calculation. Therefore, there should be flexibility in the way that Project Developers can calculate project-specific fNRB rates that captures this variability more effectively using localized data on biomass fuel use and harvesting* |  |
|  | **Page 27** | **4, 5 and 6** | **Te** | In the Quantifying Consumption section of Appendix 2 Report from External experts it is stated that “*A third option is to use the default value currently recommended by the UNFCCC for woodfuel projects, which is 0.4 tons of wood per capita, held constant throughout the entire simulation. We selected this option since it falls between the two previous options.”*. As the actual woodfuel consumption in an area plays a crucial part in determining the fNRB and is one of the key variables, we believe that a general default value is not appropriate to use.Through numerous baseline studies conducted by our team using the robust KPT version 4 protocol, which is considered to be one of the most robust field tests to determine actual household wood consumption, the average wood use per capita per annum greatly exceeds the value used in the proposed fNRB calculation. Please see baseline wood use values from various of our registered carbon project below as determined through conducting KPTs:GS11145: 0.8 tons per capita per annum (Zambia)GS11596: 0.8 tons per capita per annum (Zambia)GS11551: 0.92 tons per capita per annum (Zimbabwe)VCS 2505:Instance 1 – 1.3 tons per capita per annum (South Africa K2C Region)Instance 2 – 1.5 tons per capita per annum (South Africa Waterberg Region)From the above values it is clear that the default value of .04 used to calculate the household wood consumption is far too low and cannot be used as a blanket value for all regions considered in the fNRB study. | It is proposed that the authors of the study and the UNFCCC re do the calculations using more appropriate consumption values as derived through KPTs or other similar field performance tests used to determine baseline wood consumption. There are numerous project developers who on the regular conduct baseline KPT’s throughout the areas considered in the study. This data is also available to the public as PD’s are required to share information such as this in the public domain through the respective carbon registries. |  |
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