TABLE FOR COMMENTS

Name of submitter: \_\_\_\_\_\_\_\_\_\_\_Lucas Belenky\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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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** |  |  | **General** | **These values of fNRB will heavily disincentivize cookstove projects, or other projects that use fNRB, as most countries end up with a low value. It may also be quite a significant shock if projects would apply those values immediately as some of them have invested financing. If the UNFCCC is perceived as a body that can change drastically the rules of the game in short time, it would be damaging for the carbon sector as a whole and the increased risk may prevent investors to invest in carbon projects. On the other hand, it is important to avoid over crediting of the older projects and potentially damaging the quality of ERs from new projects using the updated, lower fNRB values.** | **A transition system might be proposed to align projects with the new values over time.** |  |
| **2** |  |  | **General** | **The new values for the fraction of non-renewable biomass means that the biomass regeneration is bigger than in the old system.** | **Consider the inclusion of the carbon sequestration in the methodology, as the carbon stock increase is currently ignored. This could potentially mitigate the negative impact that the lower fNRB values will have on projects.** |  |
| **3** |  |  | **Technical** | **fNRB default values are presented for fixed 10-year periods.** | **There should be clear guidance which fNRB value should be used for crediting periods that fall into two different 10-year periods.** |  |
| **4** |  |  |  | **Proposed values might not match the fNRB values presented by host countries** | **Suggest allowing host countries to propose their own default values for projects to use.** |  |
| **5** |  |  | **Editorial** | **Throughout the document fNRB is described as a fraction but presented, it seems, in terms of percentage. For example in Table 3 on page 61, fNRB values are 33, 56, 13, 42, for example.** | **Throughout the document they should be listed as a fraction (0.33, 0.56, 0.13) or as a percentage and indicated with “%”.** |  |
| **6** |  |  | **Technical** | **The model focuses primarily on residential woodfuel demand due to lack of reliable data, expected small share, and expected more sustainable management.** | **Suggest the methodology team for the report to revisit the assumptions and model to include non-residential woodfuel demand to the extent possible.** |  |
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