TABLE FOR COMMENTS

Name of submitter: _____Foundation myclimate _____

Affiliated organization of the submitter (if any): _____

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Template for comments

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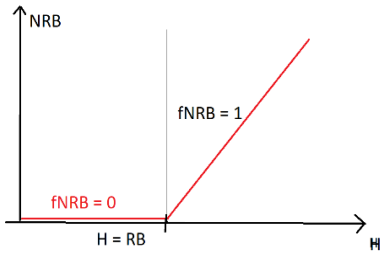
#	**Para No./ Annex / Figure / Table**	**Line Number**	**Type of comment** **ge** = general **te** = technical **ed** = editorial	**Comment** **(including justification for change)**	**Proposed change** **(including proposed text)**	**Assessment of comment** **(*to be completed by UNFCCC secretariat*)**

1	2.15	Equation 4	ge	**While we generally welcome to detailed, spatially sensitive modelling approach of MoFUSS until this point, strongly disagree with the derivation of fNRB as described in equation 4.** **As already stated in the previous submission and as confirmed by external forestry experts, we are convinced that this calculation of fNRB as the quotient between the amount of non-renewable biomass NRB and the total woody biomass harvest H in the area is conceptually wrong.** **Incorrect fNRB definition as used in MoFUSS (and predecessors):** $$fNRB = \frac{NRB}{\mathrm{H}} = \frac{non-renewable\ biomass}{total\ harvest}$$ **The correct interpretation of fNRB as it is necessary to obtain information on how many emission reductions can be derived from a reduction of woody biomass harvest should be the following:** **1. It needs to be demonstrated that a region does indeed suffer from overexploitation of woody biomass caused by woodfuel use (NRB > 0)** **2. For NRB <0, fNRB is 0** **3. If NRB > 0, then the fraction of non-renewable biomass describes how much a reduction of woody biomass harvest H translates to a reduction in overuse of the biomass, which is NRB. This is a seemingly small but conceptionally huge difference that we believe was .** $$fNRB = \frac{\Delta NRB}{\Delta \mathrm{H}} = \frac{\text{change in } non-renewable\ biomass}{\text{change in } total\ harvest}$$ **Thus, MoFUSS model results are crucial to determine how high the overused/non-renewable amount of biomass (NRB) is in a region, i.e. if the region falls into the NRB > 0 regime. However, when a model does fall into this regime, and the additional condition that H << NRB is given in a project region, any reduction in total harvest should almost entirely translate to a reduction in non-renewable biomass, thus fNRB values close to 1.** **A sketch of this concept is provided here.**  **On the ground, this reflects to the concept that if the condition that a wood resource is overexploited is fulfilled, a reduction in biomass consumption will first occur to the non-renewable fraction of the biomass with almost immediate effect.** **In old methodologies like AMS I.E / II.G in 2012 this concept was represented correctly, leading to relatively high national fNRB default values (while we acknowledge that these national default values and the old methodology had other shortcomings that have been improved since).** **We understand that this feedback might have major implications on how the fNRB is handled. While MoFuss brings many improvements over old approaches and greatly enhances data quality its final definition of fNRB is conceptually incorrect.**		

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				We thus strongly urge the authors and the MP to reconsider this feedback and allow sufficient resources and time to develop a consistent fNRB model and not adapt a conceptually wrong model. **In case this suggestion despite its urgency should be dismissed, we advocate that at least the concept of a marginal fNRB as e.g. Burn stove has been suggesting, is adopted in MoFuss as it is closer to a correct representation of reality than the current fNRB definition.**		
2	**3.3**		**ge**	**We strongly encourage the discontinuation of the CDM Tool (at least in its current form) to derive a region fNRB values for the two main reasons:** **1. The definition of fNRB is conceptually incorrectly calculated as NRB/H in the tool in the same way as it is taken up by MoFuss and described in point 1.** **2. All available input data that the tool requires is not available in the necessary accuracy level and with the tool itself not accounting for uncertainty of input parameters, the fNRB "values" derived from the tool to not meet any minimum requirements for data robustness.** **3. In the past the input parameters for calculations performed with the Tool 30 were not checked correctly by the validation bodies and standards, allowing for very inconsistent calculations**		
3	**2.9**		**te/ge**	**The model not accounting for non-energy woods demand and timber introduces a huge bias in some countries. The text gives an example from South Africa, stating that "any inaccuracies as a result of ignoring plantation are likely minimal" as only 2% of the country's total land area is managed forests – but it fails to notice that this is almost 1/4th of the entire forest area of the country and thus a non-negligible. In other countries like India, all forests in the country that are not protected areas are managed forests where large amounts of timber extraction happens that the model fails to account for.**	**We request that further effort is made to parametrize how much of each countries/regions forests are under management and how much timber is likely to be extracted. While in some countries this number might indeed be negligible, in other countries this leads to a strong bias towards very low fNRB values that overestimates the amount of available renewable biomass by neglecting timber extraction.**	

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4	**1.4**		**ge**	**From a scientific standpoint we welcome the refined model input parameters and the newly developed uncertainty estimation that accounts for uncertainty from at least one major input parameter, making . However, as many of the suggested model outcomes show very large standard deviations, it is unclear to us how these uncertainties should be accounted for in the actual project development and the emission reduction calculations (none of which have the potential to consider uncertainty ranges as of today).**	**We request that further guidance is provided on how the uncertainty estimates should be treated in projects and the calculation of emission reductions.**	