**Template for comments** | **Date: August 1, 2024** | **Document:**

## 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 | General | N/A | ge | Many thanks to Rob Bailis and Adrian Ghilardi for their work on this Updated Report and to the UNFCCC for guiding this process for improving default fNRB values. | | |
| 2 | 2.1 What is fNRB? Para. 14 | N/A | ge | **2.1 What is fNRB?** "…if more wood is harvested than the landscape can replace…, harvesting is not sustainable and tree cover will decline over time."<br><br>Clarifying question:<br>In calculating fNRB should (or does) MoFuSS account for biomass growth potential above and beyond the replacement rate? If, for example, there is potential for tree cover to increase by 1% per year, should fNRB account for the delta between tree cover decline and potential tree cover growth of 1% above replacement, rather than the delta between tree cover decline and the replacement rate exclusive of potential growth. | If MoFuSS is calculating fNRB based on the amount of wood harvest beyond what the landscape can replace, should it instead be calculating fNRB based on the amount of wood harvest beyond what the landscape grow/increase above replacement? In other words, should the increment of potential growth above replacement also be included in fNRB calculations alongside losses below replacement. | |

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| 3 | **2.14 Calculating fNRB**<br>**Para. 55** | N/A | ge | **2.14 Calculating fNRB**<br>"To estimate fNRB, we sum the losses occurring within the administrative boundary of interest and divide that by the total biomass harvest within that same boundary."<br><br>Clarifying question (same as above):<br>In calculating fNRB, should (or does) MoFuSS 'sum the losses occuring' against a baseline of the potential growth/increases above the replacement rate, or against a baseline of the replacement rate? | Given:<br>fNRB = Losses / Harvest<br><br>should losses be defined as:<br>Losses = Losses below Replacement + Unrealized Growth Potential above Replacement<br>(Instead of losses defined as only Losses below Replacement) | |
| 4 | General | N/A | ge | **Marginal fNRB:**<br>The current methodology within the MoFuSS model for calculating the fraction of Non-Renewable Biomass (fNRB) may overlook the complexities of calculating the incremental fNRB of marginal harvesting practices.<br><br>By focusing primarily on the total available wood stock, rather than on the non-renewability of the reduction in harvest, the model might risk underestimating the true extent of the non-renewability. A more accurate approach might involve treating fNRB as a marginal variable, similar to how energy efficiency projects calculate marginal grid emission factors under AMS II.C. | **Recommendation:**<br>Reevaluate the fNRB calculation methodology to consider fNRB as a marginal variable. This would involve adjusting the MoFuSS model to reflect the non-renewability of marginal reductions in harvest rather than the total wood stock.<br><br>**Proposed Actions:**<br>• Initiate further studies to explore the potential impacts of adopting a marginal approach to fNRB.<br>• Re-run the MoFuSS model for the period 2020-2030, using intervention scenarios aligned with Paris Agreement goals on clean cooking practices, to develop new marginal fNRB defaults.<br>• Ensure that published fNRB defaults reflect the difference between baseline and intervention scenarios. | |

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| 5 | General | N/A | ge | **Residential Charcoal Consumption and Institutional Wood Consumption:**<br><br>The current fNRB calculations in the MoFuSS model account for residential charcoal consumption and institutional wood consumption using generalized adjustments (10% for wood and 20% for charcoal) across sub-Saharan Africa. However, these adjustments may not fully capture the true impact of these consumption patterns on non-renewable biomass resources. Charcoal production, especially for residential use, often involves the harvesting of wood at rates that significantly exceed natural regeneration, likely leading to higher marginal non-renewability. Similarly, institutional wood consumption—such as that by schools, prisons, and other public facilities—can be substantial and concentrated, further exacerbating marginal non-renewability in specific regions.<br><br>Given the significant environmental impact of charcoal production and the high demand for woodfuel from institutional users, it is likely that the marginal non-renewability of residential charcoal and institutional wood demand is underestimated in the current model, likely justifying higher marginal fNRB values. | **Recommendation:**<br>Reassess the fNRB values using a marginal approach for regions with high residential charcoal consumption and significant institutional wood consumption. This reassessment should be based on more localized and detailed data that accurately reflects the intensity and concentration of biomass extraction for these purposes.<br><br>**Proposed Actions:**<br>• Conduct a thorough review and update of data on residential charcoal production and consumption, particularly in regions where charcoal is a primary cooking fuel. This review should include the inefficiencies of charcoal production processes that result in higher wood demand and lower regeneration rates.<br>• Assess institutional wood consumption on a more granular level, focusing on the impact of concentrated demand in urban and peri-urban areas where institutions are typically located.<br>• Use the findings to adjust fNRB values upwards where evidence shows that residential charcoal and institutional wood consumption significantly contribute to marginal biomass non-renewability.<br><br>This is justified by the need to more accurately capture the environmental impact of residential charcoal consumption (and associated production) and institutional wood consumption, the marginal impacts of which may be underestimated in generalized models. | |