

Call for public input on the updated revised report from the experts on the "Default values for fraction of non-renewable biomass (fNRB)"

I appreciate the opportunity to provide input on the revised report concerning default values for the fraction of non-renewable biomass (fNRB).

I have two key points that I would like to raise:

The current methodology primarily provides fNRB values at national or subnational levels. However, this approach may not accurately reflect the conditions of smaller or more localized projects. Many low-scale projects may encounter challenges when required to use a national value that does not represent their specific circumstances. For this reason, I strongly believe that project developers should be allowed to follow an alternative methodology or guidelines that enable them to present project-specific fNRB values, supported by relevant and credible sources. This flexibility would help ensure that the values used are more accurate and reflective of the project's actual impact.

Secondly, the current model does not differentiate between various types of woody biomass, instead providing an average fNRB value. However, there is a significant difference between firewood and charcoal in terms of renewability and impact. Firewood is often manually gathered in close proximity to households, while charcoal is typically purchased from sellers who obtain it through more resource-intensive processes. Given these differences in renewability timeframes and the nature of their procurement, it is essential that the methodology distinguishes between the two. Allowing project developers to use specific fNRB values corresponding to the type of woody biomass utilized in their projects, rather than an average, would lead to more accurate and fair assessments.

In conclusion, I recommend that the methodology be updated to allow for the calculation of project-specific fNRB values where appropriate and to differentiate between firewood and charcoal to better reflect their respective renewability impacts.

Thank you for considering these suggestions.

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