Template for comments

Date: 1 Aug 2024	Document: Proposal for improvement - Updated fNRB Values

TABLE FOR COMMENTS

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0	1	2	3	4	5	6
#	**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	**-**	**-**	**ge**	**Extension of Public Commenting Period** The information note was published on 20 June 2024, only allowing stakeholders to share feedback on the note and the related research work till 01 August 2024. We strongly feel that this timeline is inadequate to review, comprehend, analyse and opine, considering the substantial amount of information present in the information note.	We would recommend extending the timeline for the stakeholder consultation process to enable participation of a broader audience including Project Developers, Academics, NGOs, Designated Agencies and Governmental bodies from host Countries. Proposed text: *"With the widespread request from stakeholders, the committee will extend the deadline for commenting on the updated fNRB information note from 01 August 2024 to 15 September 2024"*	

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2	Page 12 to 15	Para 39 to 48	Te	**Residential, commercial, and industrial woodfuel consumption** We find that the MoFUSS model uses a vague assumption to calculate the biomass for Energy Applications that includes residential, commercial and industrial consumption with a limited explanation lacking a methodical or research-backed approach. It is currently assuming the commercial, and industrial woodfuel consumption only based on 4 SSA countries, including one significant outlier among the cited examples, which we believe is too simplistic. We strongly recommend the MoFUSS research team explore research methodologies that would allow country specific biomass consumption values rather than a simplified assumption.	We ask that the research team use more localized and reliable sources such as regional studies, official statistics, IEA statistics, UN data, surveys, registered PDDs, etc." for calculating biomass consumption for residential commercial, and industrial wood fuel consumption.	
3	Page No – 13 to 14 Para No – 41 and 42	4	Te	**Accounting for non-energy wood demand and timber plantations** Para 41 and 42 justify the exclusion of non-energy wood demand for applications like building materials and timber exports citing reasons such as non-availability of the forest plantation maps, minimal inaccuracies associated with the exclusion of non-energy biomass consumption, etc. However, the research team has not clarified how they ensured that exclusion of forestry plantations from the 2010 NASA data of Global above Aboveground and Belowground Biomass initial stocks given the challenges in accessing the forest plantation maps. If MoFuSS does not exclude the forest plantations in its initial biomass stocks, then the consumption of non-energy wood demand should also be considered in the MoFuSS model.	We ask the research team to clarify their approach of exclusion of forest plantations in their initial biomass stocks sourced from 2010 NASA biomass maps. Otherwise the biomass demand for non-energy applications, namely building constructions and timber export should be included in the model.	

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4	**Para No – 2 & 3 Pg No – 25 of 67**	**Whole Para 2 & 3**	**Te**	**Marginality Concept** While the current fNRB approach does indicate the portion NRB of total biomass consumption in a country, it does not explicitly account for the actual NRB portion of biomass savings achieved by the project activity. The current approach applies a pre-calculated fraction of NRB in the fuel saved, but cannot accurately discern the true portion of biomass that is fully non-renewable since it ignores the effects of the project activity which reduces non-renewable harvest. A concept of “Marginality" is needed in the fNRB computation which calculates the real NRB portion of biomass saved by taking both baseline and project demand scenario into consideration, given the likelihood that the biomass saved from the project activity can be obtained predominantly from non-renewable biomass sources. Similar marginality concepts have been applied in the emission reduction approach in energy efficiency projects like AMS II.C, wherein a marginal grid emission factor (instead of the average grid emission factor) is applied to quantify the emission reduction impacts. This would mean the methodology clearly looks at the source of the saved units of electricity where it would have been potentially generated (mostly costly and non-renewable sources) and uses its emission factor. In this case, if an average grid emission factor were to be applied in the emission reduction calculation, the climate impacts of renewable energy transitions would be significantly undervalued. A similar methodology should be applied in cleaning cooking methodologies to measure the real climate impacts of clean cooking by looking at the marginal biomass offset. The existing fNRB approach applies predefined NRB fractions on the saved biomass based on a baseline scenario and fails to differentiate how much saved fuel is truly sourced from NRB based on a current demand scenario. Most importantly, fNRB changes with biomass supply and demand scenarios, hence it is not appropriate to apply the same fNRB values in both baseline and project scenarios, rather it should be applied on the marginal changes (i.e., the difference between baseline biomass consumption and the reduction that occurred due to the project scenario). In the current methodology, the fNRB undervalues the climate impact created by the clean cooking projects. The marginality concept for fNRB calculation is being actively discussed within the cleaning cooking communities and seems like an actionable item to improve the valuation of clean cookstove projects. Given the MoFuSS tool is already able to compare baseline and project demand models, the application of the marginal fNRB calculation approach should align with the current capabilities of the tool.	We recommend that the MoFuSS research team include the marginality module in the MoFUSS tool to accurately capture the climate impact created by the clean cooking and safe water projects and to assess the real forest cover change scenario. Given the discussions that have already occurred among stakeholders, we propose that MoFuSS host a stakeholder consultation meeting including various SMEs from Global South, academicians, Carbon PDs etc. to brainstorm and work through the practical considerations of the marginality concept and eventually to understand how to include this feature in the MoFUSS tool.	