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 | Appendix 3 / Para 18 | N/A | ge | The paragraph clearly stated that the current model is a complicated model and requires some knowledge of coding in the appropriate languages (R, C++, and Dinamica-EGO). We are in the process of developing an open-access cloud-based version of the model, which will allow anyone to run it for an area of interest (country, project area, etc) and adjust parameters without needing to download software or understand the underlying code. Therefore, it can be said that is not yet user-friendly for public to run with specific data that they have.  This may mean that the consultant will be the sole entity that can process modelling of fNRB. Therefore, if a PD would like to run the model with their specific numbers based on a validated survey, they need to reach out to the consultant directly. Is this something that is allowed by UNFCCC? How can UNFCCC set the standard that make sure the independency of this consultant/entity so that the result coming from PD’s number will be acknowledged? | We encourage UNFCCC to support the transition of the MoFUSS model to be user-friendly for public users through open-access cloud-based version of the model, so that it can be used by public using the local validated data and therefore will be specific to the local situation.  Since this open-access cloud-based version would take some time to develop, we ask for UNFCCC to ensure that there are other options for fNRB values, that may include independent calculation of fNRB, whether through the revised/updated version of TOOL30 or other method that is deemed appropriate.  We ask for UNFCCC to ensure independency of the entity that run the MoFuSS model and to ensure that procedure is in place for the DOE to check this independency. |  |
| 2 | Para 23-24 (Section 2.5) | N/A | te | This paragraph discusses the sources for biomass stocks data and it is noted that the datasets are all 10 or more years old which may not reflect the actual situation of the last 10 years. | We propose for the MoFuSS model to use a more recent data that is also publicly available, such as from the European Space Agency (ESA) data which can be accessed in this link: <https://climate.esa.int/en/projects/biomass/> |  |
| 3 | Para 41-42  (Section 2.9) | n/a | te | The paragraph mentioned plantation which then raise the question about the treatment of tree plantation in biomass supply. However, it is not clear on the reference to be used on whether tree plantations is covered by eligibility criteria from the methodology/tool. | We believe that tree plantations should be an applicability / eligibility criteria instead of a variable in model for biomass supply. If a project has any relationship with plantations, this relationship should be excluded from the carbon project.  We ask for UNFCCC to make clearer reference about tree plantation involvement in carbon project. |  |
| 4 | Para 48 | n/a | te | Similar to para 23, the biomass users map sources are used (i.e. WorldPop map). Does this imply that the use of open source as an input to the MoFuSS model can be validated? | We propose for the report to provide clear information whether the data taken from the open source has been validated by any recognized institution that can confirm the data is correct.  If the report continues to use an open source input without clear information on its validity, we ask that UNFCCC provide clear guidance and adequate time for the DOE to review or validate those input prior to the release of these default values. |  |
| 5 | Para 64 (Section 2.15.2) | n/a | te | The paragraph mentioned that the model increases the friction by 90% for this assessment.  We would like to know what the basis is for selecting 90% friction in protected areas because the source was not identified in the report.  As we understood, for local inhabitants, the access to protected areas could vary greatly. We believe this should be also a factor for a methodological requirement, treated on a project/VPA scenario and should not be included in the general tool. | We ask for the report to clearly provide the reference of this 90% increase.  We propose for UNFCCC to consider this friction as a factor for a methodological requirement, treated on a project/VPA scenario and should not be included in the general tool such as this assessment. |  |
| 6 | Para 67 (Section 2.15.3) | n/a | te | Similar to para 64 where friction is being applied to a general tool for calculating a default value.  We believe that this should be treated in each project as a particularity of that project, since the estimation of a general scenario for this is very uncertain. | We propose for UNFCCC to consider this friction as a factor for a methodological requirement, treated on a project/VPA scenario and should not be included in the general tool such as this assessment. |  |
| 7 | Para 69 (Section 2.15.4) | n/a | ge | As mentioned in the other paragraph that this model is also meant to be used publicly, we question how the demonstration of “prune” factor can be done by project developer later on. | We propose for UNFCCC to provide clear guidance on the prune factor determination for project to use in the future model of the MoFuSS that is open-access and cloud-based. |  |
| 8 | Para 86 | n/a | ge | It is noted that the MoFuSS model acknowledge the complexities in the simulation of woodfuel harvest and regrowth. The model is assuming that all input values are very reliable however we found that there is already a more recent data available that can be used for the input, e.g. the biomass stocks data, that was not used in the modelling. | We ask for UNFCCC to conduct thorough validation of the data used in the modelling to ensure that these data reflect the most up to date situation. |  |
| 9 | Table 5 (page 31) | n/a | ge | The table show the Standard Deviation that are derived from variance of NRB and fNRB resulting from Monte Carlo simulation. However, it is not clear how the Monte Carlo simulation determines which NRB and fNRB that are selected for the table.  As an example, it is not clear how the choice of fNRB of 5% for Indonesia with an SD of 100% is selected to be presented. The justification of using 5% as a conservative number is not wel informed in the table nor in the paragraph. | We ask for the report to provide transparent process and clear justification on how the Monte Carlo simulation selected these NRB and fNRB values in Table 5. |  |
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