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** | It must be noted that the authors have put a significant effort into the realisation and subsequent revision of the MoFuSS paper. The model seems to provide accurate fNRB estimates based on latest sciences and including relevant experts ‘feedback from the first round of commenting period. However, the following comment and attached paper below questions the applicability of these fNRB values in existing carbon methodologies:  1) **System change**: MoFuSS evaluates the unbalance of fuel harvesting based on a pixel-based approach (i.e. consumption of all the households in those pixels) whereas in carbon methodologies, the project intervention areas consist of only the households included in the project. Hence, the emission reductions must also consider the fNRB evaluated for the same system. In carbon methodologies,the definition of project intervention areas consists of only the households included in the project. Hence, it is different than the definition of the MoFuSS model which relies on project geographic locations. Considering the first definition, when a project reduces the consumption of renewable biomass (RB) within a specific location, this RB becomes now available for everyone inside and outside the project boundary. This can alternatively be considered as a **positive leakage** contribution, meaning that there is an additional reduction of the project emissions occurring outside the project intervention area. | The model used for calculating the fNRB is not questioned as it is understood that it is based on the latest science and available data, including expert’s feedback for revision.  However, the application MoFuSS derived values for cookstove methodologies as they are presented is not compatible and rely on different definitions and interpretations of fNRB parameter.  As described in the comment and more extensively in the paper below: it should be clearly defined in the MoFuSS paper that those fNRB values cannot be used directly in carbon methodologies unless a change in the definition of the project scope is defined. In theory, as long as the sustainability equilibrium has been reached (H=RB, e.g. derived through MoFuSS) any reduction of consumption tackles the overconsumption at first. This would lead to 100% of associated issuances (no fNRB discount until sustainability equilibrium). |  |
|  |  |  |  | 2) **Overconsumption:** Improve/clean cookstove projects tackle first the overconsumption of biomass in the project intervention area. It is understood that tackling this overconsumption allows to reduce this share of overconsumption until the sustainability equilibrium has been reached, therefore claiming 100% of issuances. In the different methodologies where the concept of fNRB applies (a.o. CDM AMS-II.G, Gold Standard Reduced emissions from Cooking and Heating (also known as TPDDTEC) and VCS VMR-0006), it is understood that 𝑓𝑁𝑅𝐵 has been mistakenly interpreted as “the emissions per unit of consumption”. In reality, the 𝑓𝑁𝑅𝐵 assesses the discrepancy between the consumption and the sustainable production of biomass by the landscape, as defined also by MoFuSS. In simplified terms, a 𝑓𝑁𝑅𝐵 of 30%, should not be interpreted as every piece of wood being 30% non-renewable. Instead, it rather means that 30% of the consumption exceeds the threshold of sustainability, and that portion of consumption in excess is causing 100% of the emissions. Therefore, any reduction of the consumption above the sustainability threshold should be integrally considered as emission reduction, not just a fraction of it, since the intervention reduces the overconsumption until the equilibrium between consumption and landscape production is reached. In essence, the marginal consumption of biomass (i.e. the last quantity of consumed wood) defines the renewability status of the consumption. |  |  |

