Call for public input	Updated revised report on the default values for fraction of non-renewable biomass (fNRB)

Name of submitter: Elisa Derby

Affiliated organization of the submitter (if any): Clean Cooking Alliance (CCA), on behalf of the Clean Cooking and Climate Consortium (4C)

Contact email of submitter: ederby@cleancooking.org

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Section no.	**Para. no.**	**Type of comment[1]**	**Comment**	**Proposed change**
N/A	N/A	ge	We consider the UNFCCC-supported MoFuSS model to be the most robust fNRB approach to date. As such, we support and stand behind the current research and the resulting revised report and updated fNRB values. We also recommend additional complementary work.	No immediate changes to the updated revised report. To UNFCCC: Consider disallowing the use of TOOL30 by all UN cookstove crediting projects and mandating the use of national or subnational default values from the MoFuSS model when available. In addition, consider commissioning an evaluation to determine whether viewing fNRB in terms of marginal (vs. national) calculations would generate more accurate fNRB estimates. Current fNRB calculations are based on the renewability of wood fuel harvesting at the national level. A marginal definition would be based on the renewability of the change in wood fuel harvesting due to project activities. Marginal fNRB defaults would be calculated by the existing MoFuSS model.
Appendix 3. *Responses to public comments*; **Section 3.** *MoFuSS*	Pg. 29, para. 7	te	On pg. 29, SEI and UNAM note that they received several suggestions requesting that MoFuSS include differences in country consumption or use more	Refine this work by commissioning and integrating complementary site-specific data into the global model

Model: Uncertainties and Complexity; **Sub-section 3.2** *Use more localized project-based data.*			localized, project-base data to improve accuracy. They add that "MoFuSS is designed to use localized data; however, for this assignment, CDM requested estimates of fNRB at a global scale." Using a global data set is a necessary first step and allows for harmonized inputs for different geographies. That said, using global data exclusively has limitations. In some countries/areas, there are site-specific considerations related to wood fuel supply and demand that can impact fNRB calculations beyond what modeling with global data alone can quantify.	for key geographies with special wood fuel supply and demand considerations, (e.g., brick-making and lumber).
Appendix 3: *Responses to public comments*; **Section 4:** *MoFuSS Model: Improvements and Suggestions* **& Section 9**: *Review, Validation & Verification Processes;* **Sub-section 4.2:** *Openness of the model and standardization of input data* **& Sub-section 9.2:** *Project-specific fNRBs and use of field data.*	Pg. 31, para. 18 & Pg. 36, para. 47	te	With the necessary guardrails, allowing project developers and other key stakeholders to parametrize the MoFuSS model with their own data could enhance the accessibility of the model and potentially result in more accurate estimations.	Support the development of an open-access cloud-based version of the MoFuss model, which will allow interested stakeholders to develop their own modelling scenarios for an area of interest using their own inputs, which could be based on government data or data derived from field measurements.

[1] **ge**=general; **te**=technical; **ed**=editorial

Appendix 3: *Responses to public comments*; **Section 8:** *Location-tailored fNRB Values and Demand Scenarios;* **Sub-section 8.1:** *Clarity on national vs/ subnational fNRB defaults.*	Pg. 35, para. 41 & 42	te	In the revised report, SEI and UNAM note that they received comments suggesting to allow country authorities to decide their own default values. In response to this comment, they mention that they "recognize and respect that national sovereignty is paramount on these issues." However, they also "caution that previous national defaults were derived using unreliable methods and were unrealistically high. In addition, some contradicted national data generated and published by the same government authorities."	We acknowledge and support the perspectives of SEI and UNAM regarding the importance of national sovereignty, while emphasizing that fNRB values should not revert to being unrealistically high. We support allowing countries some flexibility in adjusting their fNRB values. However, to do so, some guardrails should be put in place to ensure that the allowed adjustment range is not too wide, preventing countries from reverting to prior fNRB values.