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 | 16 | 5 | ge | “Stakeholders may also propose new methodological approaches for calculation of fNRB resulting in further advancement in terms of accuracy and conservativeness…”. The use of “conservativeness” is problematic here. Conservativeness should not be a consideration, the values should be accurate, thus accuracy should be at the forefront and not be conservative as values can be accurate, but not conservative and vice versa. | Remove “conservativeness” from the text. Suggested text: “Stakeholders may also propose new methodological approaches for calculation of fNRB resulting in further advancement in terms of accuracy, for consideration the CDM EB.” |  |
| 1 | 16 | 5 | ge | “Stakeholders may also propose new methodological approaches for calculation of fNRB resulting in further advancement in terms of accuracy and conservativeness…” There is not much language around how the potential new approaches can look. Does it have to be fully validated / peer reviewed models or can it be idea note which the MP will then investigate further. | More clarity is required on how the potential new methods can look or how they will be considered by the MP. |  |
|  | Table 3.3 fNRB Values | Table 3.3 | te | The sub-national default values have been removed, without explanation. We suggest allowing the use of such subnational values until further data/research provides updated numbers. If the reason for removing them was lack of confidence in the existing values, we propose to at least create a work stream in the MP to properly develop such figures, as they will greatly increase accuracy and bring values closer to the reality of project-based activities. | Either allow the continued use of subnational values until reliable data becomes available—particularly at the local or regional level—or require the MP to establish a dedicated workstream to develop these subnational values. This process should include a transparent explanation for their removal to ensure that any concerns are adequately addressed through the additional work. |  |
|  |  |  | ge | During the last public consultation period, numerous comments were raised in relation to the MoFuSS model. It is not clear in the updated Tool 33 whether these concerns / comments were addressed in the current version of Tool 33. | Provide a tracking table or change log on how the MoFuSS model was amended post last public consultation. |  |
| 5 | 5.4 | 15 | te | KPT data submitted by developers shows much higher fuelwood consumption than the assumed 0.4 t/person/year in MoFuSS. Ignoring this leads to underestimation of emissions. | Incorporate KPT data submitted by the PD Forum and other country-specific surveys as default or adjust the default to reflect this wider dataset (e.g., SSA: 0.71 t/person/year). |  |
| 7 | 5.5 | 16 | te | MoFuSS values rely on outdated datasets (>10 years old), yet the model is presented as generating national defaults. This undermines credibility unless local data inputs are integrated. | Update Tool33 values based on a re-run of the MoFUSS model with the most up to date datasets. |  |
| 9 | 5.5 | 16 | te | The current definition of fNRB focuses on total harvest, not marginal reductions. This departs from the approach in AMS-II.G, risking misalignment with efficiency methodologies. | Request the MP to set up a budget and work plan to investigate the possibility of a marginal fNRB approach. |  |
| 10 | 5.5 | 16 | te | TOOL 33 currently reflects average fNRB across total national/regional harvest. However, carbon projects reduce biomass usage at the margin—they displace the most recent, incremental harvesting that would otherwise occur. | Allow for use of marginal fNRB values, justified using credible models (e.g., MoFuSS), to reflect the emissions avoided by project activities more accurately. |  |
| 11 | 5.5 | 16 | te | MoFuSS excludes biomass from land clearance and any other non-sustainable extraction of wood from forests. fNRB is the proportion of biomass harvested in a given area that exceeds the natural rate of regeneration. Surely when determining the fNRB, all drivers of deforestation and forest degradation should be taken into account and not just fuelwood harvesting as it is a combination of the drivers which contributes to the deterioration of the forests. | Include all wood / biomass harvesting except for that form sustainable forests and woodlots. |  |
| 12 | 5.5 | 16 | te | MoFuSS can be run to produce fNRB values at a more granular and specific scale.  Other initiatives and standards have already adopted the use of MoFuSS-derived values as the basis for future fNRB default generation. Aligning Tool 33 with this approach promotes standardization across standards and minimises risk of public scrutiny. | Include the recommendation to use MoFUSS derived fNRB values as an option to calculate fNRB. |  |
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