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.” |  |
|  | Table 3.3 fNRB Values | Table 3.3 | te | We have noticed that 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, without jeopardizing project feasibility. | 1. Continue allowing the use of subnational values until further data is provided by reliable sources, especially at the local/regional level or (ii) mandate the establishment of a workstream in the MP to develop such sub-national values, transparently explaining why the subnational values have been removed, so that concerns be properly addressed as part of the additional work. 2. Allow country governments and PDs to use MoFuSS-derived fNRB values at either a national or sub-national value. This will allow governments or PDs to strengthen fNRB values in their countries or project areas by using country- or project-specific data (instead of global data sets, as was used in MoFuSS). |  |
|  |  |  | 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. |  |
| **1** | 5.3 | 14 | te | Lack of Regional Variation in WCCF Defaults  The default WCCF of 4:1 does not reflect regional variation in kiln types, wood moisture content, or traditional vs. improved carbonization technologies. Field studies and national surveys (e.g., in Kenya, Rwanda, Ghana) show WCCF ranging from 4.5 to 7.5 in traditional systems and 3.5–4.5 in improved kilns.  Here is a list of publications that reflect the discrepancy observed here: [LINK](https://docs.google.com/spreadsheets/d/1dHAHMSruYombgBoitCm5PCNsZvQP6It8/edit?usp=drive_link&ouid=113750626920219758095&rtpof=true&sd=true) | Provide region-specific default WCCF values or allow country-specific values to override the default when supported by peer-reviewed or Host Country-endorsed data. |  |
| 2 | 5.3 | 14 | te | Transparency in Data Sources and Assumptions  The source data and assumptions behind the WCCF default are not disclosed in the tool. This makes it difficult for project developers and host country stakeholders to verify or validate the factor. | Publish a transparent methodology note or annex explaining the derivation of the 4.0 default, including moisture content assumptions, carbonization type, kiln efficiency, kiln type and geographic basis. |  |
| 3 | 5.3 | 14 | te | Conflict with Host Country Defaults or Surveys  Several Host Countries have issued national energy statistics or biomass conversion studies with different WCCF values. Using a flat global default risks misalignment with national MRV systems and could undermine host country ownership. | Allow substitution of the default with Host Country-approved WCCF values, where documented through credible and peer-reviewed national studies or public energy surveys. |  |
| 4 | 5.3 | 14 | te | No Guidance on Fuelwood Basis (Wet vs. Dry)  The default WCCF of 4.0 (wet basis) does not clarify the assumed moisture content range of the input wood, which can vary substantially across geographies and seasons. | Clarify the assumed moisture content (e.g., 20%, 30%) and provide a sensitivity range or conversion method to adjust the WCCF accordingly in cases where field data are reported on a dry basis. |  |
| 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). |  |
| 6 | 5.5 | 16 | te | The MoFuSS tool has not undergone adequate validation or approval from DNAs. The fNRB estimates should be delayed until scientific consensus and stakeholder feedback from Host Countries can be incorporated. | Delay fNRB default publication until validation by DNAs and expert review is complete. Establish a transparent country consultation process for data and model acceptance. |  |
| 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. | Enable project developers to submit updated, locally validated biomass stock data. Only release national defaults when current data (e.g. post-2020) are used or validated. |  |
| 8 | 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. | Support generation and use of marginal fNRB values using MoFuSS scenarios that compare business-as-usual vs. intervention scenarios. |  |
| 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. | We need a dedicated budget and project plan to develop a MoFuSS based marginal approach for fNRB which will represent the impact of a cookstove project more accurately |  |
| 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 (e.g., for agriculture) despite its contribution to fuelwood. This contradicts observed field dynamics in Sub-Saharan Africa. | Include deadwood and deforestation by-products as a parameter contributing to renewable biomass or justify their exclusion quantitatively. |  |
| 12 | 5.5 | 16 | te | MoFuSS (Model for Fuelwood Supply and Sustainability) provides a dynamic, spatially explicit and temporally sensitive modelling approach to estimating fNRB.  Unlike static national averages, MoFuSS integrates:   * Land cover changes * Biomass regeneration * Demographic pressure * Urban-rural demand gradients * Trade dynamics   MoFuSS can be run to produce subnational, marginal, and temporally updated fNRB values that respond to actual landscape and energy trends, rather than frozen default snapshots.  The ICVCM and Gold Standard have already adopted MoFuSS-derived values as the basis for future fNRB default generation. Aligning Tool 33 with this approach promotes inter-standard harmonization, minimizes conflict, and supports cross-use of data. | In recognition of the evolving research into fNRB, include a provision allowing project developers to propose MoFuSS-derived fNRB values, provided they are transparently documented and validated through, in line with the evolving practices and using robust reference data |  |
| 13 | Table 3 | 18 | te | Without disaggregated urban fNRB defaults, urban projects face undercalculation of their true avoided emissions, making them economically non-viable despite their real climate benefit. | Integrate or allow the use of urban-specific fNRB default values for densely populated municipalities where charcoal or fuelwood supply chains are documented to originate from non-renewable sources. Alternatively, require projects to demonstrate urban-specific supply dynamics using tools like MoFuSS or official supply chain data. |  |
|  | Par 14 |  | te | The updated Tool 33 adopts a wood-to-charcoal conversion rate of 4 kg of wood per kg of charcoal, i.e. 4:1 or 25%. Since it seems to be a general default factor, with no mention to specific carbonization practices/technologies, we believe such a value is excessively high as a general reference for the domestic energy use context. Recently available research in SSA[[1]](#footnote-1) conducted by Oregon State University, Aprovecho Research Center, SunFire Energy in Malawi, and the Council of Scientific Research-Institute for Industrial Research in Ghana, has measured wood to charcoal conversion rates in different kiln runs in Malawi and Ghana. The average rates were 7.3 to 1 in Malawi and 6,9 to 1 in Ghana, which is closer to the previous IPCC based default of 6:1 but quite far from the proposed value under tool 33 (4:1). However, as the system boundary expands to account for all mass lost during harvesting, transportation, and distribution, the research registered increases in the conversion factor, reaching 9.5 kg/kg in Malawi and 10.6 kg/kg in Ghana (10.0 kg/kg overall). | Change the updated Tool 33 default to 7:1, as per the evidence above, or at least 6:1 (former IPCC based value) while more primary data is made available. |  |
|  | **Par 15** |  | **te** | The value of 0.4 is quite far (below) from reality. The information note, based on which the proposed changes in Tool 33 are being made, mentions that fuelwood and charcoal consumption parameters have been reviewed (paragraph 14d of the Information Note), but it does not specify the numbers adopted by the mode (MoFUSS). In previous versions, such figures were excessively conservative and did not reflect reality. On paragraph 20c, the Note refers to the WHO Global Household Energy Model as a reference for the amount of people consuming biomass, but it does not mention the adopted consumption factor per person or per HH. Likewise, paragraph 15 of the updated tool 33 mentions a factor of 0.4 tons of biomass/person/year, but there are no references to sources, and it is not clear if the fNRB default values have been based on this number. | 1. Change the 0.4 default value to 0.5. Recent KPTs often point out to values between 1 and 2 tons/person/year, which strongly suggests that 0.4 is excessively conservative and not consistent with the minimum cooking needs for survival in urban or rural areas in SSA. 2. Provide transparency, by disclosing the adopted biomass consumption values per capita or per HH that were used for the calculation of the proposed fNRB default values. This should be done at least at the country level, if data used for sub-national values is not available. |  |
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1. Urben, Jessie et al, (2025). *Quantifying conversion factors for the supply chain of charcoal production in Malawi and Ghana*. Forthcoming. Jan 8, 2025. [↑](#footnote-ref-1)