We express concern over the MoFuSS-proposed default fNRB values, which do not align with India’s ground realities. A national fNRB of 7% underrepresents the true environmental impact, given ongoing deforestation. India’s diverse forest conditions require region-specific data, not a one-size-fits-all model. States with high wood dependence and deforestation, like Rajasthan and Assam, show contradictory fNRB values. The methodology lacks clarity on wood fuel demand and forest accessibility across varied geographies.  
Inconsistencies across states like Punjab and Uttar Pradesh highlight the flawed uniform approach.  
Low fNRB values threaten carbon revenue streams for clean cookstove projects in vulnerable regions. These risks discouraging investments and prolonging traditional biomass usage.  
We recommend removing fNRB or revamping its methodology to focus on actual fuelwood reduction. Cookstove projects should be recognized as both emission reduction and carbon removal initiatives.