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** |  |  | **ge** | We are concerned that pressure from external organisations like carbon standards and the ICVCM etc could force a rushed decision by the UNFCCC methodological panel to approve a set of parameters in Tool33 that has to date failed to stand up to scrutiny. We urge the panel to keep in mind that the wrong decision (ie inclusion of miscalculated default parameters) could be extremely detrimental to regional carbon programmes - threatening to obliterate community based carbon projects from entire regions, and distort national GHG inventory and NDC calculations. Whilst the intended evolution of Tool33 towards higher accuracy and credibility is welcomed, given the high stakes surrounding use of this tool, these changes should be introduced with caution - once sufficient consensus amongst academics and host countries has been reached. We emphasise that conservativeness does not itself equate to accuracy and credibility, and that a high integrity carbon market should be built on scientific best practice; to date, we do not feel that the required threshold for consensus from the scientific community has been adequately demonstrated. In particular, we highlight the following specific shortcomings (this list is illustrative, not exhaustive):* Lack of independent validation for the MoFuSS tool using contemporary satellite data and ground truthing studies
* Omission of urban fNRB values or a separate approach to calculating urban values
* The unresolved issue of marginality, that many peers argue should be included in the MoFuSS model.
* Lack of cooperation with host countries and inconsistence with host countries' own reported inventories. Host countries should play a vital role in defining locally applicable assumptions, social and behavioural context, and providing contextually appropriate data to ensure regional accuracy
* Inadequate approach to modelling the impacts of 'protected areas' on fNRB\*
* The fact that model is built upon inputs with a tendency towards defaults and average values. It is vital to be informed as to what the input parameters of the model are, and which of them can/have been effectively adjusted to fit the specific situations and regions of interest (such as in determination of the subregional defaults that are being proposed). It would seem surprising that standard defaults can adequately fit the diversity of interactions between abiotic, biotic and social factors encountered in subregions. We hypothesize that the scientific validity of the model derived values would be improved by fine scale and in-situ insights, measures and analyses - and call for much greater transparency in what inputs are used for regional calculations.
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| **2** |  |  | **te** | \*To expand on this lesser-discussed issue:*A critical challenge in the geospatial analysis of biomass, especially in the context of protected areas (PAs), lies in the simplification of their boundaries as mere cartographic polygons. This representation often ignores the complex internal zoning that defines different levels of administrative conservation, such as strict core zones versus more flexible buffer or multiple-use zones. Beyond legal delineation, it is imperative that our models and analyses reflect the gap between regulations on paper and actual management in the field. The effectiveness of biomass conservation depends not only on legal designation but also on the capacity to implement and enforce those regulations. Therefore, it is essential that geospatial analysis integrates monitoring data on changes in forest cover and biomass that can reveal where anthropogenic pressures persist despite protection, or where effective management is generating positive conservation outcomes. Only in this way will we be able to obtain a true picture of the impact of PAs on the renewability of locally available woody biomass.* |  |  |
| **3** |  |  | **ge** | We also call for clarity on if and when further regional calculations will be made available and included in Tool33. |  |  |
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