

We would like to raise serious concerns regarding the new default fNRB values proposed by MoFuSS. The fNRB plays a vital role in classifying harvested wood as renewable or non-renewable, which directly impacts projects aimed at reducing firewood usage, especially improved cookstove initiatives.

While standardization is important, the proposed national fNRB value of 7% for India does not reflect ground realities. India's forest loss in 2023, along with varying levels of firewood dependence across states, clearly shows that a one-size-fits-all value is not suitable. States like Rajasthan, with minimal tree cover and high wood fuel reliance, are assigned a 0% fNRB-this makes no practical sense. On the other hand, states with abundant biomass, like Assam, have been assigned disproportionately high values.

The inconsistency continues in agricultural states like Punjab and Uttar Pradesh, where low forest cover and high usage still result in unjustifiably low fNRB values. These mismatches highlight the flaws in the current methodology and the urgent need for more region-specific and data-driven assessments.

Such arbitrary values threaten to discourage investment in clean cooking solutions by reducing carbon credit potential. We strongly urge for a re-evaluation of the methodology and recommend eliminating the fNRB parameter altogether to simplify funding and focus on real impact-reducing firewood use and emissions. Cookstove projects should also be recognized as carbon removal efforts, which would open doors to better funding and support the larger goal of climate action.