I would like to express my concerns regarding the recently proposed default fNRB values by MoFuSS and the ongoing discussions within the Methodology Panel. The fNRB parameter plays a critical role in determining the renewability of harvested wood, which directly impacts the viability of emission reduction projects, particularly in the clean cooking sector.

The proposed national default fNRB value of 7% for India appears to significantly underrepresent the country's actual forest degradation and wood fuel dependence. For example, despite India losing 171 kha of forest in 2023, only 7% of harvested wood is categorized as non-renewable—an inconsistency that questions the robustness of the underlying data.

State-level discrepancies further highlight methodological issues. Rajasthan, a dry state with low biomass and high fuelwood use (64% rural reliance), is assigned a 0% fNRB, while Assam—with higher biomass and similar fuelwood usage—is assigned 24%. Likewise, Punjab and Uttar Pradesh, both with limited forest cover, are given fNRB values of just 1% and 2%, respectively, which doesn't reflect the actual ecological stress or usage patterns.

These anomalies suggest that the current MoFuSS approach does not sufficiently account for regional forest dynamics, wood fuel dependency, or the availability of harvestable biomass. Uniform application of such default values could discourage investment in clean cooking projects, reducing the potential for carbon financing and, in turn, climate benefits for marginal communities.

I strongly urge a reassessment of the methodology, advocating for more region-specific data and a possible reconsideration of the use of fNRB altogether. The focus should shift to supporting technologies that genuinely reduce emissions, rather than overcomplicating biomass classification. Moreover, improved cookstove initiatives should be recognized as carbon removal strategies, not just emission reduction tools—unlocking broader funding opportunities and aligning with global climate goals.

Thank you for considering the concerns.

Best regards,
Abhishek Mondal