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TABLE FOR COMMENTS

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#	Para No./	Line	Type of	Comment	Proposed change	Assessment of comment
	Annex / Figure /	Number	comment	(including justification for change)	(including proposed text)	(to be completed by UNFCCC
	Table		ge = general			secretariat)
			technical			
			od -			
			editorial			
	5.5(16) and	All lines	te	We respectfully wish to express our grave concerns regarding the	5.5(16):	
	5.5(19)			proposed requirement to utilize a national fNRB value for all carbon projects, including those in Pakistan. Our nation's geography, topography	The project participants, in principle, shall use	
				and forest distribution vary dramatically across regions, resulting in	methodology/ies specifies other level (e.g.	
				substantial differences in biomass renewability metrics that cannot be	national). In addition, where subnational values	
				The proposed national fNRB value of 8 for Pakistan drastically	In cases where neither the sub-national or	
				underrepresents the actual fNRB value in numerous regions of our country.	national values are listed, the regional default	
				previous draft of Tool 33, section 5.5(19) have established significantly	propose new methodological approaches for	
				higher fNRB values in several provinces:	calculation of fNRB values that result in further	
				1. Azad Kashmir: 44	consideration the CDM EB.	
				2. Gigit-Baltistan: 39	5 5(19)	
				3. Khyber-Pakhtunkhwa: 22	The default values for the fraction of non- renewable biomass (fNRB) at the sub-national	
				These sub-national calculations reflect the actual biomass conditions on the ground and represent a more accurate basis for project development than the proposed national average.	level are listed below in Table 4.	
$\left[\right]$				The implementation of a uniform national fNRB value of 8 would render		
				economically unviable all clean water and improved cookstove projects		
				values. This would effectively eliminate the potential for carbon finance to		
				support critical interventions addressing two of our nation's most pressing		
				1 Water Contamination Crisis: Approximately 70% of Pakistan's		
				population (169,043,000 individuals) currently drink bacterially		
				contaminated water. Each year, an estimated 71,611 deaths are directly attributable to diarrheal diseases stemping from		
				inadequate water, sanitation, and hygiene infrastructure.		
				2. Indoor Air Pollution: Household air pollution from traditional		
				158,400 lives annually in Pakistan, disproportionately affecting women and children.		
				The proposed national fNRB value methodology would prevent carbon		
				financing from supporting interventions in these critical areas, effectively		
				closing off an important pathway for addressing these urgent public health crises.		
				We respectfully request that the Clean Development Mechanism adopt a		
				significant regional variations within nations.		
$\left \right $				Specifically, we propose that:		
				 Project developers be permitted to utilize sub-national fNRB values calculated utilizing MoFuSS 		
$\left \right $				2. A framework be established for the periodic review and update of		
				both national and sub-national fNRB values to reflect changing conditions.		
				This approach would maintain the environmental integrity of the Clean		
$\left \right $				Development Mechanism while allowing critically needed projects to		
				economically viable.		
				The Opportunit of Delvister relevant is a state of the st		
				Development Mechanism's commitment to environmental integrity and		
				standardized methodologies. However, we respectfully submit that the		
				regional variations in forest conditions that exist within our nation and many		
				others.		
				By allowing for the use of sub-national fNRB values, the Clean		
$\left \right $				Development Mechanism would more accurately reflect actual environmental conditions while enabling crucial development projects that		
				address pressing public health needs in our most vulnerable communities.		
				We represtully request your thoughtful consideration of this matter		
				and remain available to provide any additional information that may		
Ц				assist in your deliberations.		