Template for comments

Date: 21 May 2025	Document:

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*)
01	18		Ge	We submit this formal critique of the current MoFuSS (Model for Fuelwood Supply and Sustainability) methodology for determining the fraction of non-renewable biomass (fNRB) with profound concern. Our analysis reveals fundamental flaws in the model's approach that systematically distort emissions calculations, particularly in geographies with complex forest dynamics like India. 1. Fundamental Methodological Oversight The MoFuSS model's critical shortcoming lies in its treatment of all forest biomass as a homogeneous supply source, failing to differentiate between: • Natural forests (subject to degradation and non-renewable extraction)	**We propose to change the fNRB values or rather omit the parameter. This parameter is not only creating the difference between the biomass, but it is discouraging the cookstove projects in the country.**	

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				• Purpose-grown plantations/agroforestry systems (managed as renewable resources) This conflation results in a significant underestimation of fNRB values, as agroforestry plantations – established primarily for food security and horticulture – are erroneously included in sustainable biomass calculations despite their negligible contribution to fuelwood supply. 2. Evidence of Systemic Error A comprehensive review of India's Forest Survey of India (FSI) reports (1980-2023) demonstrates: • Increased forest cover driven entirely by afforestation/agroforestry programs • Continued degradation of natural forests, with declining growing stock and ecological quality		

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				• Dominance of open/degraded forests (now comprising 61% of India's forest area) The model's inability to distinguish between these biomass types violates IPCC 2006 Guidelines (Volume 4, Chapter 2), which specify that only depletion of natural forest stocks should factor into fNRB calculations. 3. Consequences for Climate Action This methodological flaw creates severe adverse impacts: • Underestimation of Baseline Emissions: Projects addressing genuine forest degradation receive fewer CERs than warranted • Financial Unviability: The drastic reduction in India's fNRB (from 70-90% under Tool 30 to 7% currently) renders most clean cooking projects economically unsustainable • Policy Contradiction: Forces an impossible choice between		

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				afforestation progress and clean cooking initiatives 4. Empirical Contradictions The proposed 7% fNRB value implies that 93% of biomass extraction is renewable, yet FSI data shows: • Continued decline in moderately dense (natural) forests • Increasing dominance of degraded open forests • No correlation between plantation growth and natural forest recovery • This disparity exposes fundamental errors in the MoFuSS modeling approach. 5. Recommended Corrective Actions We urgently propose either: 1. Model Modification: Exclude purpose-grown plantations from sustainable biomass calculations to ensure fNRB reflects only natural forest extraction		

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				2. Country-Specific Adjustments: Implement empirical corrections based on verified degradation data (e.g., FSI records) where model refinement proves insufficient 6. Call for Immediate Review The current methodology: • Undermines the integrity of emissions accounting • Disincentivizes legitimate climate mitigation projects • Contradicts India's commitments under the Paris Agreement We stand ready to provide technical support and additional data to facilitate necessary revisions. The credibility of carbon markets and our collective climate goals depend on addressing these critical issues without delay.		