

TABLE FOR COMMENTS

Name of submitter: _Bridge Carbon _____

Affiliated organization of the submitter (if any): _____

Contact email of submitter: **donee.alexander@bridgecarbon.com**

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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)
	Paragraph 14	n/a	te	The updated Tool 33 adopts a wood-to-charcoal conversion rate of 4 kg of wood per kg of charcoal, i.e. 4:1 or 25%. Since it seems to be a general default factor, with no mention to specific carbonization practices/technologies, we believe such a value is excessively high as a general reference for the domestic energy use context. Recently available research in SSA ¹ conducted by Oregon State University, Aprovecho Research Center, SunFire Energy in Malawi, and the Council of Scientific Research-Institute for Industrial Research in Ghana, has measured wood to charcoal conversion rates in different kiln runs in Malawi and Ghana. The average rates were 7.3 to 1 in Malawi and 6,9 to 1 in Ghana, which is closer to the previous IPCC based default of 6:1 but quite far from the proposed value under tool 33 (4:1). However, as the system boundary expands to account for all mass lost during harvesting, transportation, and distribution, the research registered increases in the conversion factor, reaching 9.5 kg/kg in Malawi and 10.6 kg/kg in Ghana (10.0 kg/kg overall).	Change the updated Tool 33 default to 7:1, as per the evidence above, or at least 6:1 (former IPCC based value) while more primary data is made available.	

¹ Urben, Jessie et al, (2025). *Quantifying conversion factors for the supply chain of charcoal production in Malawi and Ghana*. Forthcoming. Jan 8, 2025.

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	Paragraph 15	N/A	te	The value of 0.4 is quite far (below) from reality. The information note, based on which the proposed changes in Tool 33 are being made, mentions that fuelwood and charcoal consumption parameters have been reviewed (paragraph 14d of the Information Note), but it does not specify the numbers adopted by the mode (MoFUSS). In previous versions, such figures were excessively conservative and did not reflect reality. On paragraph 20c, the Note refers to the WHO Global Household Energy Model as a reference for the amount of people consuming biomass, but it does not mention the adopted consumption factor per person or per HH. Likewise, paragraph 15 of the updated tool 33 mentions a factor of 0.4 tons of biomass/person/year, but there are no references to sources, and it is not clear if the fNRB default values have been based on this number.	a) Change the 0.4 default value 0.5. Recent KPTs often point out to values between 1 and 2 tons/person/year, which strongly suggests that 0.4 is excessively conservative and not consistent with the minimum cooking needs for survival in urban or rural areas in SSA. b) Provide transparency, by disclosing the adopted biomass consumption values per capita or per HH that were used for the calculation of the proposed fNRB default values. This should be done at least at the country level, if data used for sub-national values is not available.	

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	Table 3.3 fNRB values	Table 3.3	te	We have noticed that the sub-national default values have been removed, without explanation. We suggest allowing the use of such subnational values until further data/research provides updated numbers. If the reason for removing them was lack of confidence in the existing values, we propose to at least create a work stream in the MP to properly develop such figures, as they will greatly increase accuracy and bring values closer to the reality of project-based activities, without jeopardizing project feasibility.	c) Continue allowing the use of subnational values until further data is provided by reliable sources, especially at the local/regional level or (ii) mandate the establishment of a workstream in the MP to develop such sub-national values, transparently explaining why the subnational values have been removed, so that concerns be properly addressed as part of the additional work. d) Allow country governments and PDs to use MoFuSS-derived fNRB values at either a national or sub-national value. This will allow governments or PDs to strengthen fNRB values in their countries or project areas by using country- or project-specific data (instead of global data sets, as was used in MoFuSS).	