

#	Date of submission	Document	Submitter	Stakeholder	Comments Summary	Proposed Change	Data Quality / Missed Parameter	Model characteristics	fNRB Improvements	Options for Roll-out of New fNRB Values	Any Other Comments
1	31 October 2023 at 00:13 GMT+1	Dee Lawrence (35 KB)	Dee Lawrence	Cool Effect (CE)	1. Insufficient time. 2. fNRB calculations based on MoFuSS model can significantly impact cookstove carbon projects and funding. 3. Large reliance on wood fuels for cooking and its environmental health and socioeconomic crisis. 4. The importance of carbon market funding for clean cooking projects, especially in Sub-Saharan Africa and Southeast Asia. 5. Concerns about over-crediting and the complexity of the MoFuSS tool. 6. The necessity for accurate estimates of non-renewable wood supply.	1. Extend the comment period. 2. Modify the model to include alternative sources of demand. 3. Seek proposals for an alternative to the fNRB default factors. 4. Revise the model to include woodfuel from agricultural expansion as contributing to non-renewability. 5. Adjust the model to accommodate variability in consumption of woody biomass per person. 6. Review the "friction factor" used in assessing wood harvesting from protected areas.	N/A	1. Complexity of the MoFuSS tool and reliance on assumptions and outdated data. 2. Difficulty in estimating the landscape's natural rate of regeneration. 3. Variability in friction factor related to protected areas.	1. Address non-residential demand in the model. 2. Include different types of biomass and harvesting scenarios. 3. Reevaluate the assumption that protected areas are less likely to be sources of woodfuel.	N/A	1. Need for thorough ground study to quantify reachable harvesting area. 2. Requirement of categorization of woody biomass types. 3. Sophisticated evaluation to determine whether consumption of woody biomass is greater than incremental biomass growth over time.
2	02 November 2023 at 03:50 GMT+1	Sassan Saatchi (70 KB)	Sassan Saatchi	CTrees.org (CT)	1. Concerns about the short three-week public comment period. 2. fNRB calculation based on the MoFuSS model represents a significant shift from current practices. 3. Implications of the model on cookstove carbon projects. 4. Importance of carbon market funding for clean cooking.	Extend the comment period for the fNRB estimation model from October 13 to January 19, 2024, for broader participation of stakeholders.	N/A	1. Complexity of the MoFuSS tool. 2. Far-reaching implications of its conclusions on cookstove carbon project crediting.	N/A	N/A	N/A
3	03 November 2023 at 17:34 GMT+1	Ji BAO (42 KB)	Advanced Carbon Asset Management Co. Ltd.	Icebergchina (IC)	1. Concern about the huge difference in fNRB values affecting international solidarity against climate change. 2. fNRB values influencing the attractiveness of green investments and carbon credits, especially in African countries. 3. Low fNRB values could hinder efforts to promote clean cooking technologies, crucial for forest protection and carbon emission reductions. 4. The absurd result where electric stoves have higher GHG emissions than improved firewood cookstoves in some African countries.	1. Using a globally uniform fNRB default value or at least a regionally uniform fNRB default value. 2. More review on the fNRB value to prevent defying common sense where electric stoves appear more harmful than firewood cookstoves.	N/A	N/A	N/A	N/A	Inconsistency in the comparison between GHG emissions from 1t firewood combustion and 1.56MWh grid power usage in various African countries due to differing fNRB values.
4	06 November 2023 at 10:17 GMT+1	Edi Medilanski (29 KB)	Edi Medilanski	Swiss Federal Office for the Environment (BAFU)	1. Welcoming the mandate to develop subnational/regional default values of fNRB. 2. Interest in fNRB values facilitating bilateral cooperation activities under Article 6.2 of the Paris Agreement.	Add a tentative timeline possibly with milestones to complete the mandate.	N/A	N/A	N/A	N/A	N/A
5	06 November 2023 at 12:04 GMT+1	Arnaud DORE (33 KB)	Arnaud Dore	Imperative Global (IG)	1. The fNRB model does not consider wood fuel consumption in commercial or industrial establishments. 2. The default wood fuel consumption per person is uniform across all countries and regions. 3. Queries about the validity period of the fNRB values.	1. Include wood fuel use in commercial and industrial activities in the fNRB model, especially for South Asian countries. 2. Reconsider the wood fuel consumption per person per year and allow the use of field test values in fNRB estimation.	1. Current use of a uniform default wood fuel consumption value for all countries and regions. 2. Suggestion to use field test values for more accurate fNRB estimations.	Concerns about the overestimation of regrowth and overestimation of fNRB as stated on page 23 of the information note.	1. Account for non-residential wood fuel demand in the model. 2. Provide more specific and location-tailored fNRB values.	N/A	1. Inquiry about validation and verification processes for the estimated fNRB values. 2. Question on the timeline for fNRB values for other countries/regions.
6	06 November 2023 at 12:19 GMT+1	Tristan Loffler (14 KB)	Tristan Loffler	MSCI Carbon Markets (MSCI)	1. Current 30% default fNRB value is rarely used and too standardised. 2. Suggestion for alignment with new methodologies. 3. Importance of ensuring model openness and methodological updates. 4. Concern about standardised inputs creating inaccuracies. 5. The need for ranged guidance on default values. 6. Mention of satellite imagery use in validating deforestation reduction. 7. Criticality of having an updating process for default values to prevent them from becoming outdated.	1. Ensure that updated cookstove methodologies align with the new modelling approach. 2. Provide ranged guidance on default values and realistic bounds. 3. Validate deforestation reduction using geospatial techniques. 4. Establish a clear procedure for regular updates of default values.	1. Inaccuracies due to standardised inputs like consumption per capita.	Local variations within the pixel approach.	1. Alignment of new fNRB values with other methodological updates. 2. Use of own inputs by projects where justified for consistency with default values.	Progressive implementation with clear procedures for regular updates.	1. The initiative to create localized default values is welcome and needed for project integrity. 2. There is a need for consistency across methodologies and default values to maximise the impact of the modelling technique.
7	06 November 2023 at 13:43 GMT+1	Samir Thapa (39 KB)	Matthew Leach and Samir Thapa	MECS, Loughborough University UK (MECS)	1. SOC exclusion justified in appendix, should be in summaries. 2. Charcoal production inclusion needs clarification. 3. Need for clearer friction maps explanation. 4. Concerns about cherry-picking by developers due to fNRB revisions. 5. Significance of stacking exclusion highlighted. 6. Impact of urban/rural classification on fNRB. 7. Importance of correctly determining consumption values.	1. Include SOC rationale in summaries. 2. Clarify inclusion of charcoal production. 3. Provide a detailed explanation of friction maps. 4. Encourage inclusion of areas with lower fNRB for SDG benefits. 5. Include stacking data where reliable. 6. Adjust methodology for accurate consumption values and urban/rural classification. 7. Improve MoFuSS web-platform.	1. Lack of stacking data inclusion may lead to conservative fNRB. 2. The 0.4 tonnes per capita consumption value may not reflect true regional differences.	1. Uncertainty from not including stacking data. 2. Potential underestimation of demand due to uniform consumption value.	1. Inclusion of reliable stacking data. 2. Methodological adjustments for consumption value differentiation. 3. Urban/rural allocation adjustments based on population density.	Consideration for periodic updates or reviews of fNRB values to incorporate new data or methodologies.	1. Need for clarification on TOOL30 modifications given MoFuSS advancements. 2. Editorial corrections for enhanced clarity.
8	09 November 2023 at 08:00 GMT+1	Tertius Murray/Nova Institute NPC (29 KB)	Tertius Murray	Nova Institute NPC (NI)	1. Global Household Energy Model may underestimate fuel use demand by only accounting for primary reliance, not secondary use. 2. Many households in South Africa rely on a mix of energies for cooking and heating, leading to significant secondary use of solid fuels not reported by national surveys.	1. Suggest adding a limitation description to the model. 2. Make provision in the model for an adjustment factor where data on woodfuel as a secondary energy carrier is available.	1. Exclusion of secondary wood use might result in an underestimation of woodfuel demand.	N/A	1. Introduce an adjustment factor in the model for secondary woodfuel use.	N/A	N/A

9	09 November 2023 at 15:01 GMT+1	Lantonirina RATOONJANAHARY / DNA MADAGASCAR (2282 KB)	Lantonirina RATOONJANAHARY	DNA MADAGASCAR (DNAM)	1. Concerns over proposed 22% fNRB value not reflecting actual deforestation rates in Madagascar. 2. Global models used for calculation may not account for local data and conditions. 3. Application of blanket rates for regions rather than specific rates for individual countries. 4. Importance of accurate local data in reflecting Madagascar's unique environmental, economic, and social pressures.	1. Reevaluation of fNRB values for Madagascar to reflect actual deforestation rates and wood use practices. 2. Consideration of higher, more realistic values to ensure accurate representation of emissions reductions by cookstove carbon projects.	1. Reliance on global satellite imagery and wood supply model data rather than accurate local data. 2. Inaccurate assumptions and data inputs due to lack of local data inclusion.	1. Methodological uncertainty in capturing local nuances of deforestation and wood use. 2. Potential oversimplification of complex dynamics between forest depletion and regeneration.	1. Incorporation of local, accurate data into fNRB calculation. 2. Adoption of region-specific assessments to accurately reflect deforestation rates and sustainable wood fuel use.	1. Progressive implementation based on localized research and analysis. 2. Adjustment of fNRB values to accurately reflect current conditions without disadvantaging cookstove projects.	Advocacy for a closer examination of Madagascar's specific challenges in determining fNRB values.
10	09 November 2023 at 15:14 GMT+1	Manantsoa TIANA / NGO Tandavanala, Madagascar (1885 KB)	ONG Tandavanala	Repetition, same as Submitter 9 (DNAM)	Repetition, Same as Submitter 9 (DNAM)	Repetition, Same as Submitter 9 (DNAM)	Repetition, Same as Submitter 9 (DNAM)	Repetition, Same as Submitter 9 (DNAM)	Repetition, Same as Submitter 9 (DNAM)	Repetition, Same as Submitter 9 (DNAM)	Repetition, Same as Submitter 9 (DNAM)
11	09 November 2023 at 15:21 GMT+1	Rajib Pramanik (29 KB)	Rajib Pramanik	EKI Energy Services Limited (EKI)	1. Model does not account for SOC changes and addresses DOM indirectly. 2. Wood consumption by formal and cottage industries and commercial establishments is not considered. 3. Assessment underestimates wood harvesting in protected areas. 4. Default value for wood fuel consumption per capita per year is set too low. 5. fNRB assessment for other regions lacks relevance due to outdated and limited data.	1. Include SOC and DOM changes in the model. 2. Consider wood consumption by industries and commercial establishments. 3. Use proper survey data for wood harvesting in protected areas. 4. Recalculate fNRB values using a default of 0.75 tons of wood per capita per year. 5. Remove irrelevant fNRB assessment for other regions from the final document.	1. Lack of consideration for wood consumption by industries. 2. Underestimation of wood harvesting in protected areas. 3. Reliance on outdated data for fNRB assessment in other regions.	1. Inaccurate accounting of SOC and DOM. 2. Overlooked consumption by industries and commercial entities. 3. Misestimation of wood harvesting in protected areas.	N/A	N/A	1. Concerns over potential discouragement of investment in community projects due to unreliable fNRB values.
12	09 November 2023 at 16:14 GMT+1	Nindamutsa (33 KB)	Mr. Astere Nindamutsa	CDM-DNA Coordinator at Geographic Institute of Burundi (IGEUBU)	1. Commends the CDM Executive Board's effort to enhance the estimation process for non-renewable biomass and recognizes the importance of clean cooking in African countries' climate action plans. However, highlights concerns about the adoption of the MoFuSS tool, its complexity, and the need for extensive training for African Host Countries. 2. Emphasizes the role of carbon market funding in expanding clean cooking access and the critical impact of fNRB calculations on credit issuance for cookstove projects. 3. Underlines the necessity of balancing fNRB adjustments to prevent both over-crediting and under-crediting. 4. Urges for comprehensive capacity building and an extension of the public consultation period.	1. Extend the comment period. 2. Direct consultation with Host Countries on the estimation of demographic and wood fuel consumption data, forestry data, and charcoal supply chain data. Host Countries and Project developers should be allowed to use nationally approved datasets to augment or replace MoFuSS data models.	1. Notes the use of outdated UN demographic data by the MoFuSS tool and a generalized estimation of wood fuel demand that may not accurately represent the current situation. 2. Highlights the opportunity for Host Countries to provide more accurate demographic and biomass consumption data, as well as data on forestry biomass stocks.	1. Concerns over the MoFuSS tool's reliance on potentially outdated and non-specific demographic data, as well as its homogenized estimation of wood fuel consumption. 2. Suggests that direct consultation with Host Countries could improve the accuracy of non-renewable biomass estimations and enhance the model's utility by incorporating nationally approved datasets.	N/A	N/A	N/A
13	09 November 2023 at 18:11 GMT+1	Aur�lie Lepage (34 KB)	Aur�lie Lepage	AERA Group (AERA)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)
14	09 November 2023 at 18:16 GMT+1	Claver Ndizeye (34 KB)	Claver Ndizeye	OBEN (OBEN)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)	Comments same as 12 (IGEUBU)
15	09 November 2023 at 18:24 GMT+1	Johanna Depenthal (35 KB)	Johanna Depenthal	Independent (JD)	1. Critiques the outdated basemap (WCMC 2010) used in AGB modelling. 2. Suggests considering more recent databases like GEDI and ESA's Climate Change Initiative Biomass project datasets. 3. Raises concerns about model calibration and validation against real-world data. 4. Highlights the omission of MoFuSS deforestation module and its implications. 5. Seeks clarity on data sources, assumptions, and limitations of variables in MoFuSS model. 6. Requests clarification on commercial woodfuel accounting. 7. Questions if the model accounts for future road network expansions.	1. Proposes using more recent AGB databases for MoFuSS. 2. Recommends calibrating and validating model outputs against real AGB estimates. 3. Suggests incorporating critical sources of deforestation into MoFuSS. 4. Calls for a summary of data sources and limitations. 5. Advises incorporating commercial fuelwood use. 6. Recommends revising MoFuSS to include future road network expansions. 7. Proposes extending the comment period to incorporate feedback and rerun fNRB values.	1. Reliance on outdated AGB basemap. 2. Lack of model calibration against observed recent AGB estimates. 3. Exclusion of deforestation module and non-inclusion of commercial woodfuel in simulations.	1. Outdated basemap and unvalidated assumptions. 2. Absence of calibration and validation processes. 3. Non-incorporation of large-scale deforestation factors and commercial woodfuel use. 4. Potential underestimation of future wood harvesting due to unaccounted road network expansion.	1. Use updated AGB databases. 2. Calibrate and validate model outputs. 3. Include deforestation sources and commercial woodfuel use. 4. Summarize data sources and limitations. 5. Adjust for road network expansion impacts.	N/A	N/A
16	09 November 2023 at 19:08 GMT+1	Nicolas Vioillier / BP Carbon Trading Limited (170 KB)	Pradeeti Tyagi	BP Carbon Trading Limited (BP)	1. Supports updating fNRB values for rigor and investor confidence. 2. Questions who will update the maps of woody biomass harvest over time. 3. Suggests providing defaults for all second administrative level for assessed countries. 4. Highlights that default UNFCCC value used is conservative. 5. Discusses model assumptions differing from AMS II.G values regarding stove efficiencies and conversion factors.	1. Generate maps of woody biomass harvest between 2010 and 2050. 2. Define a plan for updating and revising data. 3. Provide default values at the second administrative level. 4. Use country-specific data for consumption quantification. 5. Ensure model assumptions are consistent with AMS II.G or provide rationale for differences.	1. Default value for consumption is conservative and misaligned with MofUSS model. 2. Lack of clarity on who updates the maps and values. 3. Need for default values at second administrative level.	1. Differences in model assumptions from AMS II.G. 2. Uncertainty about charcoal to wood conversion factors.	1. Expand geographic reach to generate reliable fNRB estimates. 2. Use country-specific data for better accuracy. 3. Clarify assumptions related to stove efficiency and charcoal to wood conversion factors. 4. Stakeholder engagement for map and value generation and updates.	1. Define stakeholder responsibilities for generating/updating maps. 2. Plan for revising default data with defined frequency.	N/A

17	09 November 2023 at 19:57 GMT+1	Ramzy Kanaan (155 KB)	Ramzy Kanaan	Modern Cooking for Healthy Forests in Malawi (MCHF)	1. Highlights issues with over-estimation of emission reductions from cleaner cooking due to inaccuracies in fNRB, ICS efficiency, and utilization. 2. Suggests that current methodology for fNRB can lead to ineffective targeting of interventions and limits cleaner cooking options to lower cost improved firewood cookstoves, thus potentially missing more impactful opportunities to address deforestation and forest degradation.	1. Fully disaggregate between firewood and charcoal to align incentives with the most impactful cleaner cooking technologies. 2. Develop a method to accurately reflect the non-renewability of woodfuel use within specific jurisdictions. 3. Recommend having default fNRB values at the lowest possible administrative level to prevent strategic selection by project developers.	1. Concerns about the generalized fNRB value that does not differentiate between firewood and charcoal. 2. The need for more accurate, woodfuel-specific fNRB values.	1. Potential over-crediting due to methodological weaknesses. 2. Averages used in fNRB calculation may not accurately reflect the sustainability of woodfuel sources.	Disaggregating fNRB values and ensuring more accurate, woodfuel-specific assessments could significantly enhance the effectiveness of cleaner cooking interventions and the integrity of associated carbon credit calculations.	Implementing more precise and differentiated fNRB values at the most detailed administrative level possible to prevent the potential for strategic manipulation by project developers.	Appreciates the work on updating fNRB values and emphasizes the importance of the public consultation period to improve the methodology.
18	09 November 2023 at 20:18 GMT+1	Tim Holland (155 KB)	Ramzy Kanaan	Repetition, Same as Submitter 17 (MCHF)	Repetition, Same as Submitter 17 (MCHF)	Repetition, Same as Submitter 17 (MCHF)	Repetition, Same as Submitter 17 (MCHF)	Repetition, Same as Submitter 17 (MCHF)	Repetition, Same as Submitter 17 (MCHF)	Repetition, Same as Submitter 17 (MCHF)	Repetition, Same as Submitter 17 (MCHF)
19	09 November 2023 at 20:57 GMT+1	BioLite (34 KB)	Erik Wurster	BioLite (BL)	1. Concerns about the short comment period for the complex fNRB methodology. 2. The model does not account for wood harvesting for non-residential purposes. 3. Questions the accuracy of comparing consumption and regrowth in specific areas due to potential mismatches. 4. Stove stacking is not accounted for, underestimating baseline fuel consumption. 5. The chosen methods for quantifying fuel consumption per person may greatly underestimate actual consumption. 6. The model potentially overestimates the regrowth potential by using growth rates for Secondary Forest ≤ 20 years across all forest types.	1. Extend the comment period. 2. Include alternative sources of demand in the model. 3. Propose methodological revision to accurately match supply and demand locations. 4. Account for stove stacking in the model. 5. Recommend using country-specific woodfuel consumption values. 6. Use growth rates specific to the age category of forest types and realistically estimate biomass availability.	1. Ignoring non-residential woodfuel use. 2. Inaccurate assumptions about fuel consumption and regrowth areas. 3. Lack of accounting for stove stacking. 4. Underestimation of fuel consumption based on thermal efficiency assumptions. 5. Overestimation of biomass regrowth potential.	1. The complexity and potential inaccuracy of the MoFuSS tool due to one-size-fits-all assumptions. 2. Potential overestimation of renewable biomass availability leading to inaccurate fNRB values.	1. Fundamental methodological revisions to include various woodfuel demands and account for stove stacking. 2. Adjustments to more accurately reflect real-world fuel consumption and forest regrowth dynamics.	N/A	N/A
20	09 November 2023 at 23:30 GMT+1	Elisa Derby (263 KB)	Elisa Derby	Clean Cooking Alliance (CCA)	1. CCA highlights the importance of new data for carbon offset buyers and the necessity of geographic contextualization. 2. They note the limitations of using global data exclusively and emphasize the need for integrating site-specific data to address unique wood fuel supply and demand considerations.	1. Integrate complementary site-specific data into the global model for key geographies with unique wood fuel supply and demand considerations. 2. Support the development of an online model version for parameterization with locally specific data.	Global data sets provide a necessary but limited picture due to lack of site-specific considerations in some geographies.	Using global data alone may not fully capture the variability and specifics of local wood fuel supply and demand, potentially impacting fNRB calculations.	N/A	Enhancing the model's accessibility and accuracy through additional data integration and online tool development.	CCA supports the current research and updated fNRB values while recommending further work to improve model precision and credibility.
21	10 November 2023 at 00:47 GMT+1	C-Quest Capital LLC (952 KB)	Jason Steele	C-Quest Capital LLC (CQC)	1. Questions the rationale behind pixel-level fNRB values due to potential mismatch in growth, harvest, and consumption. 2. Critiques the assertion that TOOL30 lacks spatial analysis capabilities, citing its flexibility and use of recent data. 3. Highlights inaccuracies in the information note regarding TOOL30's recommendations on data sources. 4. Addresses TOOL30's ability to define accessibility, challenging the note's claim about protected areas exclusion. 5. Points out complexities in MoFuSS due to various inputs and the absence of collinearity assessment among variables. 6. Calls for verification of baseline AGB maps and accuracy of future AGB estimates. 7. Urges the assessment of growth functions for accuracy. 8. Seeks clarity on harvest function's pressure index and its calculation. 9. Criticizes assumptions on per capita wood fuel consumption and exclusion of commercial wood products. 10. Suggests cross-checking model results with external deforestation and urbanization trends. 11. Recommends including other sources of deforestation and degradation beyond residential demand.	1. Suggest including a discussion on pixel-scale fNRB values. 2. Correct descriptions of CDM TOOL30 to reflect its guidelines and flexibility. 3. Clarify TOOL30's capacity for spatial analysis and recent data use. 4. Amend TOOL30 descriptions to accurately depict accessibility assessment. 5. Include resolution adjustments and collinearity assessments. 6. Verify 2010 baseline AGB maps for accuracy. 7. Validate growth function and report its accuracy. 8. Describe pressure index calculation and verify harvest function. 9. Use country-specific data for consumption calculations. 10. Perform a general cross-check of model results against external trends. 11. Estimate impact of non-residential deforestation drivers.	1. Misrepresentation of TOOL30's capabilities and data sources. 2. Lack of detailed justification for pixel-level fNRB values. 3. Exclusion of significant woodfuel consumption sources. 4. Overlooked complexities and uncertainties in MoFuSS inputs. 5. Reliance on potentially inaccurate baseline AGB data. 6. Uncertainties in growth and harvest function accuracies. 7. Assumptions on per capita consumption and exclusion of commercial wood products.	1. TOOL30's adaptability to incorporate spatial data and the absence of a collinearity assessment. 2. Potential inaccuracies in AGB estimations affecting fNRB calculations. 3. Lack of clarity on pressure index calculation in MoFuSS. 4. Need for cross-validation of model results with other deforestation and consumption data.	1. Refinement of fNRB methodology to include pixel-level considerations and additional data sources. 2. Validation of MoFuSS model inputs and functions for enhanced accuracy. 3. Incorporation of country-specific consumption data and assessment of non-residential deforestation drivers. 4. Amendment of TOOL30 descriptions for clarity on its flexibility and capacity.	N/A	Check the submitted Appendix Reports for more details.

22	10 November 2023 at 01:15 GMT+1	Annelise Gill-Wiehl (229 KB)	Annelise Gill-Wiehl	University of California Berkeley (UCB)	<p>1. Emphasizes the importance of adopting newly released fNRB values for ensuring the reliability and conservatism of biomass usage estimates. 2. Expresses concerns about the continued use of TOOL30 despite its limitations and applauds the MoFuSS analysis for its advanced approach in estimating fNRB values. 3. Argues for the mandatory adoption of MoFuSS-derived fNRB values at the most granular level available and calls for the update of fNRB values each monitoring period to reflect the most current science. 4. Critiques TOOL30 for not incorporating dynamic variables like population growth and land cover change at a detailed level, thus potentially allowing projects to generate excess offsets and revenue at the expense of scientific accuracy.</p>	<p>1. Enforce the use of MoFuSS-derived fNRB values for projects, eliminating the option to use TOOL30 or less robust methods.
2. Require projects to update fNRB values at each monitoring period for the most current and accurate estimations.
3. Adopt fNRB values at the most granular (location-specific) level available, with the provision for national figures for projects with a national scope or those using charcoal with a national market.
4. Update methodologies as new global datasets and assumptions become available, maintaining a commitment to the latest and most robust scientific approaches.</p>	N/A	N/A	<p>1. Adoption of MoFuSS fNRB values to ensure the generation of offsets reflects the latest, most robust approach.
2. Updates to methodologies as new data becomes available, ensuring continuous improvement and adherence to scientific advancements.</p>	<p>1. Immediate adoption of MoFuSS-derived fNRB values for all relevant projects.
2. Regular updates to fNRB values in line with new scientific insights and global datasets.</p>	<p>1. Stresses the critical role of accurate and conservative estimation in maintaining the integrity and credibility of cookstove offsets and the carbon market as a whole.
2. Highlights the risk to the carbon market's reputation and the financing of Sustainable Development Goals if flexibility in methodology allows for the generation of non-scientifically backed offsets.</p>
23	10 November 2023 at 01:30 GMT+1	Projecto Mirador Foundation (35 KB)	Esther Adams	Projecto Mirador LLC (PM)	<p>1. Raises concerns about the proposed fNRB values potentially jeopardizing carbon-financed cookstove projects and the economic, social, and health benefits they provide. 2. Emphasizes the need for a more extended comment period to allow for a thorough review by the scientific community, highlighting the risks of relying on a small group of scientists and the necessity of considering diverse perspectives and approaches. 3. Points out the high number of assumptions within the MoFuSS model could lead to inaccuracies, potentially affecting the perception and funding of cookstove projects.</p>	<p>1. Extend the comment period
2. Acknowledge the limitations and potential inaccuracies in calculating fNRB using MoFuSS and communicate these risks clearly to all stakeholders.
3. Consult directly with Host Countries on wood fuel consumption data and other relevant parameters, allowing nationally approved datasets to augment or replace MoFuSS data models for more accurate fNRB estimations.</p>	<p>1. Default wood fuel consumption value used in MoFuSS is significantly lower than actual consumption figures in some regions, indicating the need for more accurate, region-specific consumption values.
2. Availability of biomass consumption data in DHS and Census survey data of most host countries, as well as verified fuelwood consumption data from carbon financed cookstove projects.</p>	<p>A large number of assumptions based on estimations and uncertain variables within MoFuSS could prevent achieving precise fNRB figures, contributing to a narrative that may undermine the credibility of carbon projects.</p>	<p>1. Incorporation of regionally appropriate fuelwood consumption values into MoFuSS calculations.
2. Direct consultation with Host Countries for data estimation, allowing for the use of more accurate and current data.</p>	<p>1. Allow Host Countries and Project developers to use nationally approved datasets to augment or supersede MoFuSS models where applicable.</p>	N/A
24	10 November 2023 at 01:51 GMT+1	Richard Lawrence (185 KB)	Richard H. Lawrence Jr.	Repetition, Same as Submitter 23 (PM)	Repetition, Same as Submitter 23 (PM)	Repetition, Same as Submitter 23 (PM)	Repetition, Same as Submitter 23 (PM)	Repetition, Same as Submitter 23 (PM)	Repetition, Same as Submitter 23 (PM)	Repetition, Same as Submitter 23 (PM)	Repetition, Same as Submitter 23 (PM)
25	10 November 2023 at 08:47 GMT+1	Eliakimu Zahabu (113 KB)	Prof. Eliakimu Mnkondo Zahabu	National Carbon Monitoring Centre, Tanzania (NCMC)	<p>1. Points out the challenges associated with the MoFuSS tool, particularly its complexity and the need for substantial training for African Host Countries to utilize it effectively. 2. The comment underscores the significance of carbon market funding for expanding clean cooking access and the delicate balance needed in adjusting fNRB values to avoid under-crediting.</p>	<p>1. Extend the comment period.
2. Provide comprehensive capacity building for African Host Countries to utilize MoFuSS effectively.
3. Consult directly with Host Countries on demographic and wood fuel consumption data, forestry data, and charcoal supply chain data, allowing for the use of nationally approved datasets to augment or supersede MoFuSS data models.</p>	<p>1. MoFuSS's reliance on generalized estimation of wood fuel consumption.
2. Use of outdated UN demographic data.
3. Host Countries have more accurate demographic and biomass consumption data that are not currently utilized in MoFuSS.</p>	<p>1. Complexity of MoFuSS and reliance on outdated or generalized data.
2. The tool's inadequacy in capturing the dynamic nature of biomass consumption and population distribution.</p>	<p>1. Integration of accurate, Host Country-provided data into MoFuSS calculations.
2. Adjustments to the tool to reflect more accurate and location-specific wood fuel demand and supply dynamics.</p>	N/A	<p>The critical need for improved accuracy and realism in fNRB calculations to support the validation and financing of cookstove projects, particularly in Sub-Saharan Africa and Southeast Asia.</p>
26	10 November 2023 at 09:00 GMT+1	TASC (58 KB)	Edwin Cogho	TASC (TASC)	<p>1. Emphasizes the critical role of carbon market funding in expanding access to clean cooking and the risk that inaccurate fNRB values pose to the financing and verification of cookstove interventions. 2. Argues that the default fNRB value of 0.3 may not prioritize accuracy, potentially affecting project-specific applications. 3. Points out the limitations of the MoFuSS tool in modeling accessibility and accurately capturing the variability of fNRB close to human habitation.</p>	<p>1. Extend the comment period.
2. Acknowledge the importance of accuracy over conservativeness in assessing fNRB values.
3. Adapt the fNRB calculations to account for project-specific conditions and allow for localized assessments.
4. Recognize the high variability of fNRB and permit the use of more accurate project-level data to inform calculations.</p>	<p>1. Default wood fuel consumption value is far too low compared to actual use in various regions.
2. The MoFuSS tool's reliance on outdated demographic data and its failure to consider localized wood fuel collection practices.</p>	<p>1. The 0.3 global default value for fNRB lacks accuracy for project-level applications.
2. Accessibility is not accurately modeled, affecting the assessment of renewable biomass.</p>	<p>1. Allow for variable accessibility rates and adjust calculations for fuel types.
2. Employ more accurate localized project-level assessments of biomass fuel use and harvesting.
3. Use consumption values derived from Kitchen Performance Tests (KPTs) or similar field tests for more accurate fNRB calculations.</p>	<p>1. Comprehensive revision of the fNRB study using more appropriate consumption values derived through KPTs or other field tests.
2. Consultation with project developers who conduct baseline KPTs to utilize publicly available data for recalculating household wood consumption.</p>	<p>The urgency in addressing the environmental, health, and socioeconomic crisis posed by polluting cooking fuels, and the pivotal role of accurate fNRB values in supporting clean cooking projects.</p>

27	10 November 2023 at 09:40 GMT+1	Dawit Tibebe (33 KB)	Dawit Tibebe	Ethiopian Clean Cooking Alliance (ECCA)	<p>1. Highlights the complexity of the MoFuSS tool and its potential for misunderstanding among African Host Countries.</p> <p>2. He points out the significant impact of biomass use in Africa on ecosystems and GHG emissions and stresses the importance of clean cooking in climate action plans. 2. The need for substantial training on MoFuSS is emphasized, along with the critical role of carbon market funding in expanding clean cooking access and the necessity of balancing fNRB adjustments to avoid under-crediting.</p>	<p>1. Extend the public consultation period.
2. Direct consultation with Host Countries for more accurate data on demographic and wood fuel consumption, as well as forestry and charcoal supply chain data, using nationally approved data sets to augment or supersede the MoFuSS data models.</p>	<p>1. The default wood fuel consumption estimate of 0.4 tonnes per capita is considered homogenized and not reflective of the continent's diversity.
2. Reliance on outdated 2018 UN demographic data for the MoFuSS tool.</p>	<p>1. The complexity of MoFuSS and reliance on generalized, potentially outdated data.
2. The need for Host Country-specific data to accurately model renewable biomass.</p>	<p>1. Inclusion of Host Country-specific data for more accurate fNRB estimations.
2. Engagement with Host Countries to ensure the protection and accurate contribution of their biomass stocks to national and regional fNRB estimates.</p>	<p>Active collaboration between the CDM MP, EB, Host Countries, and Project developers to enhance the accuracy and applicability of the fNRB model.</p>	<p>The emphasis on the need for careful consideration and improvement of the fNRB estimation process to support clean cooking initiatives effectively.</p>
28	10 November 2023 at 12:12 GMT+1	DNA Kenya (114 KB)	ANNE NYATACHI OMAMBIA Ph.D.	NATIONAL ENVIRONMENT MANAGEMENT AUTHORITY (NEMA KENYA) DNA FOR	<p>Comments same as 27 (ECCA)</p>	<p>Comments same as 27 (ECCA)</p>	<p>Comments same as 27 (ECCA)</p>	<p>Comments same as 27 (ECCA)</p>	<p>Comments same as 27 (ECCA)</p>	<p>Comments same as 27 (ECCA)</p>	<p>Comments same as 27 (ECCA)</p>
29	10 November 2023 at 12:17 GMT+1	Boele van Oosten (33 KB)	GEDIZ KAYA	MUNDO VERDE CLIMATE (MVC)	<p>1. Suggests emphasizing the critical role of updated default values in ensuring the accuracy of emissions reductions claims.
2. Recommends mentioning potential limitations or challenges of the MoFuSS model for balance.
3. Advocates for presenting biomass stock datasets in a tabular format for clarity.
4. Proposes a brief explanation of Monte Carlo simulations for reader understanding.
5. Calls for addressing potential biases in regrowth estimation and model adjustments.
6. Suggests acknowledging the significance of soil organic carbon (SOC) changes.
7. Recommends summarizing challenges and implications of accounting for deadwood.
8. Advises briefly summarizing key steps in calculating fNRB.
9. Recommends explaining the IDW algorithm for distributing woodfuel demand.
10. Asks for a brief explanation of "woodfuel-shed" in the model context.
11. Suggests providing an explanation of the "prune factor".
12. Proposes providing an alternative reference for accessing MoFuSS results.
13. Calls for explaining the BaU scenario.
14. Recommends elaborating on factors influencing fNRB outcomes.
15. Suggests summarizing proposed changes to TOOL30.
16. Asks for explaining terms "maximum AGB stocks" and "growth rates (rmax)".
17. Recommends providing a caption for Figure 20 to enhance comprehension.</p>	<p>1. Emphasize the role of updated default values for emissions reduction accuracy.
2. Add a section on MoFuSS model limitations.
3. Present biomass stock datasets in tabular format.
4. Include a brief explanation of Monte Carlo simulations.
5. Address regrowth estimation biases and model adjustments.
6. Acknowledge SOC changes significance.
7. Summarize deadwood accounting challenges.
8. Summarize key steps in fNRB calculation.
9. Explain the IDW algorithm.
10. Define "woodfuel-shed".
11. Explain "prune factor".
12. Provide alternative access to MoFuSS results.
13. Explain the BaU scenario.
14. Elaborate on factors influencing fNRB.
15. Summarize TOOL30 changes.
16. Explain "maximum AGB stocks" and "growth rates".
17. Provide a caption for Figure 20.</p>	<p>1. Need for a more comprehensive overview incorporating potential model limitations and biases.
2. The importance of clarity in presenting key model inputs, methodologies, and results.</p>	<p>1. The complexity and potential oversimplifications within the MoFuSS model.
2. Uncertainties in the estimations of biomass regrowth and consumption.</p>	<p>1. Enhancements in the presentation and explanation of model data and methodologies.
2. Incorporation of additional data sources and clarifications to address potential biases and improve model accuracy.</p>	<p>N/A</p>	<p>N/A</p>
30	10 November 2023 at 12:40 GMT+1	catherine mukobo (187 KB)	Catherine Mukobo	ACERD asbi (ACE)	<p>1. Mukobo commends the effort to establish new defaults for the fraction of non-renewable biomass (fNRB) in Sub-Saharan Africa but points out the necessity for greater sophistication in statistical modeling to be matched with the most relevant local data inputs including satellite technology and ground-sourced data.
2. Advocates for standardized fNRB approaches.
3. Stresses the need for direct engagement with host country governments for accurate data on forest cover and fuel demand.</p>	<p>1. Extend the comment period .
2. Consult directly with Host Countries on the estimation of demographic and wood fuel consumption data, forestry data, and charcoal supply chain data.
3. The quantification of demographic and wood fuel consumption data can be sourced from updated Host Country approved DHS or Census data.
4. Call for key registries and standards bodies to align on guidelines for the application of new fNRB defaults.
5. Engage host country governments for good local data inputs into forest cover change and fuel demand for cooking.
6. The report should incorporate a description of the calculation of the pressure index and the friction factor, along with an explanation of the relationship between these elements. Additionally, it is crucial to provide justification for the assumptions and methods employed in determining the friction factors.</p>	<p>1. Reliance on outdated 2018 UN demographic data and a generalized estimate of wood fuel consumption.
2. The necessity for more accurate, host country-specific data inputs.
3. The model can be modified to include alternative sources of demand.</p>	<p>1. The complexity of the MoFuSS tool and reliance on generalized data.
2. The tool's inadequacy in capturing the dynamic nature of biomass consumption and population distribution.</p>	<p>1. Inclusion of accurate, Host Country-specific data for more precise fNRB estimations.
2. Engagement with Host Countries to ensure the protection and accurate contribution of their biomass stocks to national and regional fNRB estimates.
3. A comprehensive peer-review before new fNRB values are implemented to ensure best practice.</p>	<p>1. Active collaboration between the CDM MP, EB, Host Countries, and Project developers to enhance the accuracy and applicability of the fNRB model. 2. A validation and verification assessment of the 2010 baseline AGB maps sourced from WCMC should be carried out. The report should incorporate a dedicated section discussing the accuracy of these AGB maps.</p>	<p>The CDM EB is requested to provide guidance on a mechanism to allow for variable accessibility rates dependent on project-specific conditions and adjust calculations for different fuel types; e.g. charcoal vs. wood. In particular, we seek guidance on how sub-national fNRB numbers can be applied to charcoal projects, given charcoal is sourced remotely from the location of households / project interventions.</p>

31	10 November 2023 at 12:57 GMT+1	DeLagua (29 KB)	David Kitt	DeLagua Health Limited (DAH)	DeLagua would like to raise a concern that insufficient time was allowed for the full digestion and analysis of the content of this report. Its content is detailed, technical and wide ranging. We have been unable to suitably review this document and compile comments within the timeframe allowed. We would request an extension, or a further period of public consultation with a wider range of stakeholders before any ratification or acceptance of the recommendations or contents of the enclosed.	N/A	N/A	N/A	N/A	N/A	N/A
32	10 November 2023 at 13:07 GMT+1	Salisu Dahiru (139 KB)	Dr. Salisu Dahiru	National Council on Climate Change (NCCC)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)
33	10 November 2023 at 13:33 GMT+1	AGOSTINHO FERNANDO (33 KB)	Fundo de Energia – Mozambique	Fundo de Energia – Mozambique (FEM)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)	Comments same as 27 (ECCA)
34	10 November 2023 at 14:16 GMT+1	Javier Aristizabal (19 KB)	Javier Aristizabal	Consultant (JA)	1. Questions the need to change the fNRB calculation method, advocating for the correct application of TOOL 30 instead of replacing it. 2. Suggests that conservative fNRB values can be achieved using TOOL 30 correctly, highlighting research from Colombia that showed variability in fNRB values based on the estimation of renewable biomass. 3. Notes that including non-forest areas in the renewable biomass assessment makes a significant difference in obtaining conservative fNRB values.	1. Propose two options for calculating fNRB: keep equation 1 as per TOOL 30/version 04.0, and use the new approach as proposed by the information note (CDM-MP92-A07).	1. Misuse of parameters in TOOL 30 leading to overestimation of fNRB in areas with significant forest coverage. 2. Importance of including non-forest areas in renewable biomass assessment.	N/A	1. Maintain TOOL 30 as a valid option for calculating fNRB when used correctly. 2. Consider regional features in fNRB assessment to ensure accuracy. 3. Allow for the inclusion of various land uses in renewable biomass assessment.	Provide clarity on how to apply national-based fNRB values to subnational analyses, highlighting the need for regional assessments to account for local features that could affect fNRB calculations.	The importance of accurate application and flexibility in choosing the fNRB calculation method to ensure the integrity of emissions reductions claims.
35	10 November 2023 at 14:49 GMT+1	Agostinho Fernando / DNA Mozambique (33 KB)	Fundo de Energia – Mozambique	Repetition, Same as Submitter 33 (FEM)	Repetition, Same as Submitter 33 (FEM)	Repetition, Same as Submitter 33 (FEM)	Repetition, Same as Submitter 33 (FEM)	Repetition, Same as Submitter 33 (FEM)	Repetition, Same as Submitter 33 (FEM)	Repetition, Same as Submitter 33 (FEM)	Repetition, Same as Submitter 33 (FEM)
36	10 November 2023 at 16:03 GMT+1	Barbara Haya (205 KB)	Barbara Haya	Berkeley Carbon Trading Project, UC Berkeley (UCB2)	Reemphasize the Comments of 22 (UCB)	Reemphasize the Comments of 22 (UCB)	Reemphasize the Comments of 22 (UCB)	Reemphasize the Comments of 22 (UCB)	Reemphasize the Comments of 22 (UCB)	Reemphasize the Comments of 22 (UCB)	Reemphasize the Comments of 22 (UCB)
37	10 November 2023 at 16:26 GMT+1	Princess Odiaka (52 KB)	Princess Odiaka	Nigeria Alliance for Clean Cookstoves (NACC)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)
38	10 November 2023 at 17:11 GMT+1	Verra (99 KB)	Christian Ehrat (Director VCS Methodologies)	Verra (VE)	1. In more industrialized developing countries, demand for wood from industries and establishments could be higher than 10% of overall wood harvest. 2. Keeping a fixed friction value of 90% is high as intrusion into protected areas varies across countries. 3. The term "project area" is imprecise, leading to non-uniformity in usage by Activity Developer. 4. Clarification requested on the use of TOOL30 for determining fNRB. 5. Future work on global datasets and assumptions mentioned, but unclear how projects in other regions could be credited. 6. Inquiry about the conservative approach to determine fNRB values, including questions on uncertainty deductions and the estimate of the default values' conservatism.	1. Include a conservative default factor for non-SSA countries to account for wood demand from industries and establishments. 2. Use a range of friction values dependent on factors like safety/rule of law, and economic growth. 3. Provide guidance on identifying the relevant "project area" within the context of activities. 4. Clarification on the crediting of projects in other regions without global datasets. 5. Questions on whether the approach includes uncertainty deductions and requests an estimate of the default values' conservatism.	N/A	N/A	1. Incorporation of industry demand in non-SSA countries. 2. Adjustable friction values. 3. Guidance on defining project areas. 4. Global datasets clarification. 5. Uncertainty and conservativeness clarification.	Clarification on including uncertainty deductions and conservativeness in fnrB calculation.	N/A
39	10 November 2023 at 17:18 GMT+1	Project Developer Forum - Martin Enderlin (125 KB)	Sven Kolmetz	BURN Manufacturing Co. (BURN)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)
40	10 November 2023 at 17:33 GMT+1	ALLCOT Group (202 KB)	Mercedes García Madero	ALLCOT AG (ALC)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)	Same Comments as 30 (ACE)
41	10 November 2023 at 18:22 GMT+1	Greg Murray (372 KB)	ABHISHEK MAHAWAR	KOKO NETWORKS LIMITED (KN)	1. Requests more time for stakeholders to review the technical data presented. 2. Highlights potential omissions in assessment due to isolated revisions. 3. Points out the need for considering different impacts of cooking technologies. 4. Questions the poor correlation between WISDOM and MoFuSS models. 5. Raises concerns about sub-regional fNRB values not matching ground observations. 6. Critiques the methodology for demand projection and excluding non-residential sectors.	1. Proposes extending the consultation period to 60 days. 2. Suggests a comprehensive review of the Default Factor Tool and methodology. 3. Recommends evolving the concept of fNRB into an impact potential factor. 4. Advocates for the development of a tool to assess the project's ability in displacement of non-renewable biomass. 5. Calls for further research on deviations between models. 6. Requests improvement in demand projection methodology using ground-level data.	1. Homogenized estimation of wood fuel demand. 2. Reliance on outdated UN demographic data. 3. Lack of specificity in sub-national geographical data.	1. Poor correlation between WISDOM and MoFuSS models. 2. Exclusion of non-residential sectors' demand.	1. Direct consultation with Host Countries for more accurate data estimation. 2. Use of updated Host Country-approved DHS or Census data. 3. Comprehensive reassessment and adjustment of fNRB values to better match actual scenarios.	Develop a comprehensive assessment tool incorporating all factors impacting emission reduction achievements.	Recognize the carbon market mechanism as a tool for channeling climate funds.

42	10 November 2023 at 18:34 GMT+1	Anantha Karthik Rajagopalan (56 KB)	Anantha Karthik Rajagopalan	UpEnergy Group (UEG)	<p>1. Applauds the research team's work on fNRB for Sub-Saharan countries using MoFuSS.
2. Seeks a training session for the MoFuSS tool.
3. Suggests the public commenting period is insufficient.
4. Raises concerns about biomass growth function assumptions.
5. Critiques the methodology for estimating wood fuel consumption.
6. Highlights transparency issues in wood to charcoal conversion assumptions.
7. Notes the non-accounting of non-residential sectors' wood fuel consumption.
8. Comments on the approach underestimating biomass harvest and inflating biomass availability.</p>	<p>1. Request for a comprehensive MoFuSS workshop.
2. Extension of public commenting period to 31 December 2023.
3. Recommends using IPCC's specific growth rates and host country data for more realistic biomass growth estimation.
4. Advocates for using country-specific wood fuel consumption values.
5. Suggests explicit mentioning of charcoal conversion efficiency.
6. Include non-residential sectors' consumption in line with CDM tool 30.</p>	<p>1. Use of a single growth rate for all forest categories.
2. Questions the rationale behind selecting UNFCCC's default value for wood fuel consumption.</p>	<p>1. Potential overestimation of renewable biomass growth potential due to growth rate assumptions.
2. Assumption of wood fuel consumption values may not represent actual demand scenario.</p>	<p>1. Standardizing fNRB approaches and engaging host countries for data inputs.
2. Peer-reviewing data inputs and assumptions.
3. Ensuring integrity across carbon markets.
4. Developing a comprehensive assessment tool incorporating all factors impacting emission reduction achievements.</p>	Collaborative Enhancement of the fNRB Model.	N/A
43	10 November 2023 at 20:09 GMT+1	Molly Brown (123 KB)	Nathan P.M. Gachugi	Repetition, Same as Submitter 39 (BURN)	Repetition, Same as Submitter 39 (BURN)	Repetition, Same as Submitter 39 (BURN)	Repetition, Same as Submitter 39 (BURN)	Repetition, Same as Submitter 39 (BURN)	Repetition, Same as Submitter 39 (BURN)	Repetition, Same as Submitter 39 (BURN)	Repetition, Same as Submitter 39 (BURN)
44	10 November 2023 at 22:56 GMT+1	Mattias Ohlson (1043 KB)	Mattias Ohlson	Emerging Cooking Solutions (ECS)	<p>1. Supports the adoption of draft default fNRB values for Sub-Saharan Africa as they represent the best-available science.
2. Calls for further research to refine these values despite supporting their immediate adoption.
3. Expresses concern over different registries applying different fNRB values to similar projects.
4. Notes the difference in deforestation impact between firewood and charcoal use, suggesting a need for distinct fNRB values or a conversion factor for each.
5. Raises the issue of attributing carbon savings between overlapping forestry and clean cooking projects.</p>	<p>1. Immediate adoption of the draft default fNRB values.
2. Calls for more research to refine fNRB values.
3. Address the inconsistency in fNRB value application by registries.
4. Propose differentiating fNRB values for firewood and charcoal use or establishing a conversion factor.
5. Suggest exploring new models or methodologies that account for differences between charcoal and firewood and the presence of REDD+ projects.
6. Regular updates to fNRB values as "best available science" improves.</p>	N/A	<p>1. Complex dependencies and lack of data to accurately model the impact of clean cooking on deforestation.
2. Overlap between different carbon credit projects without coordination.</p>	<p>1. Different fNRB values or a conversion factor for firewood and charcoal.
2. More inclusive models to account for the difference between charcoal and firewood and the existence of REDD+ projects.</p>	<p>1. fNRB values need to be regularly updated to reflect improvements in science.
2. Accommodate iterative changes to fNRB values in the carbon ecosystem ongoingly.</p>	The necessity for collaborative efforts to refine and adapt fNRB methodologies in response to new data and scientific advancements.

45	11 November 2023 at 14:30 GMT+1	Lucas Belenky / World Bank (31 KB)	Lucas Belenky	World Bank Group (WBG)	<p>1. Concerns that new fNRB values may disincentivize cookstove projects due to significantly lower values.
2. Highlights the potential negative impact of immediate application of new values on existing projects and the carbon sector.
3. Raises the issue of mismatch between the proposed values and host countries' expectations.
4. Points out the presentation discrepancy of fNRB values as percentages rather than fractions.
5. Comments on the exclusion of non-residential woodfuel demand from the model due to data limitations.</p>	<p>1. Propose a transition system to gradually align projects with new fNRB values.
2. Consider including carbon sequestration in the methodology.
3. Provide clear guidance for crediting periods that span different 10-year periods.
4. Allow host countries to propose their own default values.
5. Clarify the presentation of fNRB values as either fractions or percentages.</p>	<p>1. Lack of reliable data on non-residential woodfuel demand.
2. Assumption of small share and more sustainable management of non-residential demand.</p>	N/A	<p>1. Revisit assumptions and model to include non-residential woodfuel demand to the extent possible.
2. Standardize the presentation of fNRB values.
3. Integrate carbon sequestration considerations.</p>	<p>1. Implement a phased transition to new fNRB values to mitigate investment risk and maintain trust in the carbon sector.
2. Enable host country input on default values to ensure alignment with national data and policies.</p>	N/A
46	11 November 2023 at 14:46 GMT+1	Bob NATIFU (29 KB)	Bob NATIFU	MINISTRY OF WATER AND ENVIRONMENT (MWE)	<p>The country-level fNRB for Uganda was calculated as 38%, indicating that only 38% of the biomass consumed in Uganda is non-renewable. This revised value underestimates the climate impacts of high-integrity cookstove projects in Sub-Saharan Africa and may adversely affect climate justice and finance for host countries. Specifically, it contrasts with the existing fNRB value (89%) used by UpEnergy's clean cook stove project in Uganda, potentially reducing emission reductions and related carbon finance.</p>	N/A	N/A	N/A	N/A	N/A	N/A
47	30 January 2024 at 14:22 GMT+1	Foundation myclimate (33 KB)	Thomas Finsterwald	Foundation myclimate (FMC)	<p>1. Welcomes the reform of fNRB calculation methods based on new research.
2. Supports the adoption of new values to reflect a robust and conservative emission reduction calculation.
3. Expresses appreciation for efforts to use electronic options for rapid and uniform analysis.
4. Highlights the inconsistent results in past fNRB determinations due to scarce data and lack of focus by project developers.
5. Points out a major conceptual flaw in the current interpretation of fNRB in emission reduction calculations, arguing that it doesn't accurately reflect the impact of reduced wood fuel consumption on forest overexploitation.
6. Questions the approach used by Bailis et al., which calculates the general overexploitation in an area, suggesting it differs fundamentally from the factor relevant for calculating emission reductions.</p>	<p>1. Strong guidance and clear communication from CDM and Gold Standard on handling existing projects.
2. Clear guidance on immediate or progressive implementation of new values.
3. Defined schedule for future updates to fNRB values.
4. Simplification of the application process for new values, ensuring conservative and robust handling.
5. For project-specific fNRB definitions, clearer and stricter controls by DOEs during validation and verification.</p>	N/A	N/A	<p>1. Adoption of updated fNRB values should consider high integrity with conservative values while also aligning closer to local realities.
2. Implementation of regularly updated values should keep the impact on projects in mind, balancing integrity with planning stability for project developers.</p>	<p>1. Immediate action for guidance on handling existing projects.
2. Clarity on the application of updated values and the timeline for updates.
3. Ensure a simple yet conservative process for applying new values, with uniform handling across projects.</p>	<p>The submission highlights the necessity for a methodological update that better reflects the actual impact of clean cooking projects on non-renewable biomass consumption and forest overexploitation. It underscores the importance of aligning fNRB calculations with the latest scientific insights while ensuring project development remains viable under new conservative estimates.</p>
48	31 January 2024 at 17:10 GMT+1	C-Quest Capital LLC (472 KB)	C-Quest Capital	C-Quest Capital (CQC2)	<p>1. Highlights the significant role of carbon finance-driven investment in clean cooking.
2. Raises concerns about the underestimation of demand and overestimation of supply in the report, leading to underestimated fNRB levels in SSA.
3. Points to declining fNRB values through 2050 contradicting the documented rates of deforestation and land degradation.
4. Identifies notable demand and supply data deficiencies, including unrealistic default factors for per capita firewood and charcoal consumption, and the assumption that all standing biomass is legitimate fuelwood source.</p>	<p>1. Suggest not publishing updated fNRB defaults without thorough independent peer-review assessments.
2. Emphasize the importance of conservative approach and extensive peer-review processes in determining climate and economic drivers.
3. Consideration of more accurate consumption statistics and wood use in traditional charcoal production.
4. Revert back to applying the IPCC default factor of 6:1 wood-to-charcoal ratio and make provision to insert measured entire supply chain ratios.</p>	<p>1. Consumption statistics for firewood and charcoal significantly higher in CQC projects than UNFCCC default factors.
2. Wood-to-charcoal conversion efficiencies and losses not adequately represented.
3. Lack of inclusion of significant sources of demand for wood such as brick-making, tobacco curing, beer brewing, and construction of farm structures.
4. The assumption that all standing biomass is part of the fuel supply, ignoring the critical livelihood value of trees.</p>	<p>1. Inaccuracies in modeling biomass growth based on forest age categories and consumption estimation.
2. Overestimation of renewable biomass growth potential.
3. Complexity of the MoFuSS tool and lack of access for comprehensive review and validation.</p>	<p>1. Include a conservative proxy for unaccounted traditional sources of wood demand.
2. Commission independent research to determine country-specific charcoal consumption trends.
3. Validate and verify estimated Above Ground Biomass (AGB) maps for accuracy.
4. Validation of population consumption, tree growth pressure index, and harvest estimates.</p>	<p>1. Delay ratifying the fNRB results until project developers and external consultants have fully tested the MoFuSS tool.
2. Recommend a comprehensive and appropriate peer-review and validation of the model and fNRB default values.</p>	<p>1. The submission highlights significant concerns with the methodology and assumptions used in the fNRB calculation, emphasizing the need for a more conservative and validated approach to ensure the integrity of carbon finance-driven investments in clean cooking and sustainable biomass fuel projects. 2. Check the submitted Appendix Report for more details.</p>

49	31 January 2024 at 17:45 GMT+1	Molly Brown (302 KB)	Chris McKinney	BURN Manufacturing (BURNZ)	Proposes replacing the concept of fNRB with Sustainable/Unsustainable Consumption Rates (SCR/UCR) to better reflect the realities of woodfuel consumption and regrowth. This approach aims to separate total woodfuel consumption into sustainable (can be regenerated) and unsustainable portions, with the goal of reducing UCR to zero for emission reductions. The proposal also highlights the ineffectiveness of the current fNRB concept in accurately reflecting emission reductions from fuel-efficient cookstoves.	1. Adopt the SCR/UCR concept for a more realistic reflection of emission reductions from cookstove projects. 2. Regular updates to values as scientific understanding and data improve. 3. Incorporate sequestration benefits for reducing consumption below SCR in methodologies. 4. Comprehensive review and potential revision of methodologies to include the new concept. 5. Encourage independent research to validate SCR/UCR concept and its impact on carbon crediting.	N/A	N/A	1. Implement the SCR/UCR model for more accurate calculations of woodfuel consumption impacts. 2. Update methodologies to include sequestration benefits when reducing consumption below SCR.	N/A	The submission underscores the need for a methodological overhaul that aligns more closely with the realities of biomass use and regeneration. It suggests a shift from fNRB to a more nuanced understanding of sustainable versus unsustainable consumption, highlighting the potential for enhanced accuracy and fairness in carbon crediting for clean cooking initiatives.
50	31 January 2024 at 23:00 GMT+1	Microsol (49 KB)	Elizabeth Lopez	Microsol (MCS)	1. Microsol supports carbon market integrity initiatives and recommends methodological improvements using satellite images. 2. Advocates for the integration of field-collected data for improved precision in results. 3. Suggests careful application to new projects considering the impact on existing PoAs.	Integrate field-collected data to enhance result precision, which can be considered during validation or project renewal phases.	N/A	N/A	Emphasizes the importance of incorporating field-collected data into the methodology to enhance accuracy and reliability.	Recommends applying the methodology primarily to new projects, with consideration for the implications on existing registered PoAs to safeguard long-term investments.	N/A