Note: This Summary Table provides a high-level view on the comments submitted by stakeholders in response to the Call for public input on the updated revised report from the experts on the "Default values for fraction of non-renewable biomass (fNRB)" (21 June to 9 August 2024, 23:59 CEST). For exact compilation of stakeholder comments, please see the supplementary "Compilation Document" attached with this Excel Sheet.

#	Date	Document	Submitter	Stakeholder	Contact	Comments Summary	Proposed Change	Data Quality / Missed Parameter	Model Uncertainties / Complexity	fNRB Improvements	Options for Roll-out of New fNRB Values	Editorial	Clarifications / Queries	Any Other Comments
1	18 July 2024 at 03:55 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/iFQBMMLCX5EPXR1HDMRCO0SFW5M5BC	Rahul Rai	N/A	N/A	1. The report proposes revised fNRB values that are significantly lower, impacting carbon-financed improved cookstove (ICS) projects worldwide. 2. The proposed fNRB values (e.g., Myanmar's value reduced from 61% to 30%) would reduce emissions reductions (ERs) by up to 80%. 3. Carbon finance is a critical incentive for private sector investment in ICS projects, and without it, such projects may no longer be viable. 4. In compliance markets, there's no premium for carbon credits from pro-poor projects, making ICS projects less competitive.	1. Propose making the actual emission factor (EF) for fuelwood 112 instead of the current 81.6 to offset reduced ERs. 2. Request for creating market premiums specifically for pro-poor ICS projects to differentiate from other carbon credit projects (e.g., wind farms).	1. The data doesn't consider the crucial role of carbon financing in supporting the poorest communities who rely on fuelwood for cooking. 2. The EF for fuelwood used in ICS projects is outdated. The value should be corrected to 112, as the current one (81.6) is inaccurate, further complicating project calculations.	1. The revised values reduce emissions by up to 80%, making ICS projects unattractive for investors, potentially stopping funding and project survival.	N/A	N/A	N/A	N/A	1. The CDM model (Clean Development Mechanism) is an effective "pay for performance" system that should be used by funds like Green Climate Fund to support cookstove projects.
2	20 July 2024 at 03:07 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/KLW7WJRWSS7P1LHPQAXIKBL2IWPQYA	Josh Goralski	Unlocking Communities	connect@unlockingcommunities.org	1. Demand for 300,000 stoves in three years; financing needed. 2. Delayed project registration due to larger developers' revenue cuts. 3. Incorrect fNRB estimates (30-40%) from TOOL30 put community projects at risk. Actual value believed to be 96%.	1. Provide a simple, clear explanation of fNRB methodology to help financiers. 2. Collaborate with grassroots organizations for more accurate data in rural areas like Haiti. 3. Allow local surveys for temporary fNRB values. 4. Consider island nations equally.	1. TOOL30 data is incomplete for rural regions like Haiti, leading to inaccurate estimates (30-40%). Ground-level data collection by grassroots organizations could improve accuracy.	1. Lack of adequate data for regions like Haiti leads to significant discrepancies in fNRB values, which impact project viability and credit calculations.	1. Suggest collaboration with grassroots organizations for more accurate local data. 2. Allow use of temporary fNRB values from local surveys in initial project stages, adjusting later with more data.	1. Propose progressive implementation by allowing temporary fNRB values for initial project stages, backed by future adjustments based on more robust data.	N/A	N/A	N/A
3	28 July 2024 at 20:55 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/1JJQNMZFBET58PIJJZ28LBNPC32K7E	Thomas Fisterwald	Foundation myclimate	thomas.finsterwald@myclimate.org	1. The current fNRB definition in the MoFUSS model is incorrect. It calculates fNRB as NRB/H, which is conceptually wrong. 2. MoFUSS model fails to account for non-energy wood demand and timber extraction, causing bias in fNRB values for certain countries (e.g., India, South Africa).	1. Suggest defining fNRB as the change in NRB relative to the change in total harvest (ΔNRB/ΔH). 2. Recommend discontinuing the CDM Tool to derive fNRB values in its current form. 3. Parametrize timber extraction in forest management calculations.	1. TOOL30 input data accuracy is insufficient, and the model doesn't account for uncertainties in input parameters, leading to inconsistencies in fNRB calculations.	1. Large standard deviations in the model outcomes are not addressed. It is unclear how uncertainties should be treated in emission reduction calculations for projects.	1. Suggest adopting a marginal fNRB approach (as proposed by Burn stove) as a temporary alternative to the current definition in MoFUSS. 2. Focus on including timber extraction in forest regions for accurate fNRB values.	1. Recommend providing guidance on how to handle uncertainty estimates in project calculations and emission reductions based on these model outcomes.	N/A	1. How should uncertainties in the model outcomes be incorporated into project calculations and emission reduction estimations?	1. If MoFUSS does not reconsider the fNRB definition, allow for marginal fNRB concepts as a temporary solution.
4	29 July 2024 at 16:59 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/UJ34B62TD223JHDBZ1H7TEUUEOSPS7L	Jessica Wade-Murphy de Jimenez	Atmosphere Alternative	jwm@atm-alt.com.co	1. Para No. 7b: Sentence 'growth rates that observed standing stocks' doesn't make sense and needs clarification. 2. Para No. 9: Confusion regarding whether decadal intervals lead to conservative or unconservative fNRB values. 3. Para No. 10: Requests for data inputs to improve certainty of revegetation rates. 4. Concerns regarding variability in NCV for wood and charcoal impacting emission reductions. 5. Uncertainty regarding altitude in harvesting likelihood.	1. Clarify wording in Para 7b to improve understanding. 2. Clarify whether decadal intervals result in higher or lower fNRB values. 3. Identify datasets or cross-checks to reduce uncertainty in revegetation rates. 4. Add guidance for including/excluding plantations in project-specific models.	1. What additional datasets could improve certainty in growth rates and revegetation? 2. How does variability in NCV impact model results?	1. Unclear how altitude is factored into harvesting likelihood. 2. Variability in NCV for wood and charcoal is not well addressed.	1. Reevaluate assumptions about wood sourcing for charcoal, especially in urban areas.	1. Provide guidance on how to include plantations and accessibility in fNRB modeling.	1. Use the same Y-axis for graphs for better visual comparison. 2. Change biomass color for easier distinction.	1. Clarify how altitude is considered in harvesting likelihood. 2. Should Para No. 92 read 'is unavoidable'?	1. Conduct sensitivity analysis for fNRB by applying realistic fuelwood harvest values (higher for SSA).
5	31 July 2024 at 01:49 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/6ATUBW2ETMDA7O82APJ11QYTPF44RE	Loic Braune	N/A	loic.braune@laposte.net	1. The landscape-based approach used in MoFUSS is incompatible with existing methodologies like CDM AMS-II.G and VCS VMR-0006. 2. Paragraphs 14-17 show incoherence in the definition of fNRB, particularly regarding emission reductions. 3. The fNRB in the scenario with and without projects should be different.	1. Clarify that the fNRB approach in MoFUSS is incompatible with current methodologies that calculate emission reductions as fNRB x displaced emissions. 2. Reevaluate fNRB in project scenarios to reflect the landscape's move towards sustainability.	1. The definition of fNRB in MoFUSS is inconsistent with methodologies that assume it represents the fraction of each unit of emissions from a non-renewable source. 2. Variability in fNRB needs better parameterization.	1. The current methodologies fail to adjust fNRB between scenarios with and without projects, leading to an underestimation of actual emission reductions.	1. fNRB should not be constant between project and non-project scenarios. Reductions in biomass consumption should alter fNRB to better represent the improved landscape sustainability.	1. Recommend considering the positive leakage effect of freeing up renewable biomass for non-project households when fNRB is reduced.	1. Paragraph 61: Suggest modifying the project system definition to include all households in the landscape, not just those in the project area.	1. How can the methodologies account for renewable biomass freed up for other households when consumption is reduced? 2. What adjustments should be made to current methodologies to better reflect the impact of projects on fNRB?	1. Consider adjusting methodologies to eliminate the fNRB parameter when calculating emission reductions and focus on biomass consumption reductions.

6	31 July 2024 at 11:14 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240606/cfi/44IEFNS1IQVMMJ0U6QQHPEL980FA6W	Edwin Cogho	TASC	edwin@tasc.je	1. Concerns about MoFuSS not being validated by DNAs within the short timeframe given. 2. Lack of independent validation for the MoFuSS tool's fNRB computation. 3. Queries about the validation timeline and framework for future development. 4. Open-access and replication challenges for the MoFuSS model.	1. Delay the implementation of fNRB estimates until broader scientific consensus is achieved. 2. MoFuSS data inputs should be validated by ground-truthed studies approved by Host Country governments. 3. Establish clear validation timelines and guidelines for future development of MoFuSS.	1. Concerns about the use of Global Forest Watch data and its relevance for certain regions. 2. Lack of updated biomass stock data for 2020, leading to a high degree of uncertainty in the fNRB results.	1. The MoFuSS model does not adequately account for future deforestation driven by climate change and agricultural expansion. 2. The exclusion of non-energy wood demand is not properly justified, especially for countries like South Africa.	1. Further explore the marginal fNRB approach and use MoFuSS to generate marginal defaults that better reflect the reduction in non-renewable biomass. 2. MoFuSS should only publish fNRB defaults based on the difference between baseline and intervention scenarios.	1. Project developers should be allowed to continue using existing fNRB protocols until MoFuSS validation is complete. 2. Project developers using MoFuSS should be guided on how to interpret standard deviations in the results.	1. Clarify chemical formulae such as "CO2" for consistency.	1. Request guidance on how VVBs will validate MoFuSS-derived sub-national defaults. 2. Clarify the impact of updated biomass stock data on fNRB results.	1. The current fNRB values have large standard deviations, leading to concerns about the robustness of these values. Further validation and funding are needed to address these issues.
7	31 July 2024 at 15:45 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240606/cfi/8U7DWMSP92KWRC28D7Q3BT0ABYW3IU	Rory McDougall	DelAgua Health Rwanda Ltd.	rory.mcdougall@delagua.org	1. Default wood fuel consumption of 0.4 tonnes per capita is too low and lacks academic justification. 2. Significant variations in proposed fNRB numbers compared to previous defaults and recent outputs. 3. Inaccurate non-residential biomass consumption for Rwanda. 4. Lack of forest plantation data impacting fNRB.	1. Quantify wood fuel consumption nationally using updated host country-approved surveys. 2. Call for a third round of public consultation due to significant changes in fNRB values. 3. Rwanda's non-residential biomass consumption should use national-level data, not a weighted average.	1. Lack of detailed national studies on non-residential biomass consumption in countries like Rwanda. 2. Forest plantation areas are inaccurately accounted for in Rwanda, leading to flawed fNRB calculations.	1. The MoFuSS values are still in development and not finalized, making them unsuitable for immediate public consultation or implementation.	1. Default fNRB values should reflect actual national data inputs, and non-residential biomass consumption should be revised using accurate country-level data.	1. Allow stakeholders to submit national-level forest plantation data to adjust fNRB numbers, as in the case of Rwanda's protected forests. 2. Continue using CDM Tool30 until fNRB values are validated.	1. Data inputs should reflect localized consumption and forest stock, not region-wide averages.	1. Provide clarity on how high standard deviations in fNRB outputs should be interpreted by project developers. 2. Reassess the impact of forest plantations on fNRB numbers for countries like Rwanda.	1. Third public consultation round needed before approving significant fNRB changes, especially for Sub-Saharan Africa.
8	31 July 2024 at 17:17 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240606/cfi/JWC3C5MUUL2Q5G7OS69GDLNOESEN4T	Sam Ngangi	N/A	N/A	1. Data granularity and quality concerns: reliance on global datasets may mask local variations in biomass consumption and regeneration. 2. Significant uncertainties in input parameters like growth rates and consumption patterns. 3. Debate over marginal vs. average fNRB approaches.	1. Address data granularity issues by integrating more localized datasets for accurate reflection of biomass consumption and regeneration. 2. Provide clarity on which approach (marginal or average fNRB) should be prioritized for consistency in emission reduction calculations.	1. Granularity of existing datasets is insufficient for accurately capturing local variations in biomass consumption, leading to potential inaccuracies in fNRB calculations.	1. Uncertainties remain in Monte Carlo simulations and assumptions regarding woodfuel harvesting distribution across rural and urban areas.	1. Prioritize using more localized data in the MoFuSS model to reduce inaccuracies stemming from generalized global datasets.	1. Recommend delaying the release of fNRB values until wider consultations and validations are completed to ensure accuracy and credibility.	N/A	1. Clarify the choice between marginal and average fNRB methodologies for accurate emission reduction estimates. 2. Provide detailed guidance on how to handle the uncertainty in MoFuSS outputs in real-world applications.	1. Transboundary trade in woodfuel needs to be more comprehensively addressed, as international dynamics can significantly impact national and regional fNRB calculations. Provide more context on trade impacts in fNRB estimates.
9	01 August 2024 at 17:36 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240606/cfi/2W87SHUT1R79W7EPSSNFXQC67Q4RYG	Evan Haigler	Impact Carbon	ehaigler@impactcarbon.org	1. Question about MoFuSS considering biomass growth potential beyond the replacement rate. 2. Concerns about how fNRB losses are calculated relative to replacement rates. 3. Suggestion that marginal fNRB may be underrepresented in MoFuSS calculations. 4. Residential charcoal and institutional wood consumption might not be fully captured in the model.	1. Recalculate fNRB to account for growth potential above replacement rate, not just losses below replacement. 2. Reevaluate fNRB as a marginal variable, adjusting MoFuSS to reflect non-renewability of marginal reductions. 3. Consider higher marginal fNRB values for regions with significant charcoal and institutional wood consumption.	1. Residential charcoal consumption data might be incomplete or generalized across sub-Saharan Africa, underestimating its environmental impact. 2. Lack of granular data on institutional wood consumption, which could significantly contribute to non-renewable biomass extraction in urban areas.	1. Uncertainty around the accuracy of generalized adjustments for residential charcoal and institutional wood consumption. This may lead to underestimation of non-renewable biomass usage in key areas.	1. Reassess fNRB values using more detailed and localized data on charcoal production and institutional wood consumption, particularly in regions where such activities are concentrated.	1. Recommend conducting further studies to explore the marginal approach to fNRB, including re-running the MoFuSS model for 2020-2030 based on Paris-aligned clean cooking interventions.	N/A	1. Clarify if MoFuSS should account for biomass growth potential above the replacement rate in fNRB calculations. 2. Clarify assumptions about institutional wood and charcoal consumption in high-demand areas.	1. Urgent need for more localized and detailed data on residential charcoal production and institutional wood consumption, which may significantly impact fNRB calculations if not properly captured.
10	02 August 2024 at 14:41 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240606/cfi/V4CSSSQC08T4CS921UYTALPMQ6TNC0	Elisa Derby	Clean Cooking Alliance (& 4C Consortium)	ederby@cleancooking.org	1. Support for the robustness of the MoFuSS model but recommend additional complementary work. 2. Recognizing the need for incorporating localized, project-based data to improve accuracy. 3. Discussion on national vs. marginal fNRB approaches and how marginal calculations might provide more accurate estimates.	1. Recommend mandating the use of MoFuSS-generated national or subnational default fNRB values instead of TOOL30. 2. Suggest conducting studies on the effectiveness of using marginal fNRB calculations rather than national averages.	1. The global datasets used in the MoFuSS model are a necessary first step but do not capture site-specific nuances related to wood fuel supply and demand in certain regions. Complementary localized data is necessary to improve accuracy.	1. MoFuSS model may not adequately account for regional consumption patterns like brick-making or lumber industries, which could affect fNRB estimates.	1. Recommend further refining the MoFuSS model to include localized data inputs for areas with special wood fuel supply and demand conditions.	1. Suggest allowing project developers to input their own data into a cloud-based MoFuSS version, improving accuracy and accessibility of the model.	N/A	1. Clarify guidelines for countries that may want to adjust their national fNRB defaults within acceptable limits to avoid reverting to outdated, high estimates. 2. Clarify potential benefits of adopting marginal fNRB approaches over national calculations.	1. Support for national sovereignty in adjusting fNRB values but recommend setting limits on the range to prevent unrealistic deviations from reliable data.
						1. The MoFuSS model is not yet user-friendly, requiring coding knowledge and is difficult for public use.	1. Support development of an open-access cloud-based version of MoFuSS for public use with validated local data.	1. The biomass stock datasets used in MoFuSS are outdated and may not accurately reflect current realities.		1. Update the model to use more recent data, including European Space Agency (ESA) data.	1. Allow independent calculation of fNRB values as an alternative to using MoFuSS or provide options through updated TOOL30.	1. Ensure that open-	1. Request clarification on the 90% friction increase in protected areas used in the model.	1. Clearer justification is

11	02 August 2024 at 17:37 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406/cfi/B45TOQOWMQS3OA2QCVYPLI3DWY6RNN	Pedro Carvalho	Ecosecurities Swiss Sarl	pedro.carvalho@ecosecurities.com	2. The biomass stock data is outdated (over 10 years old). 3. Treatment of tree plantations in biomass supply is unclear. 4. Use of unvalidated open-source data.	2. Update MoFuSS with recent biomass data from sources like ESA. 3. Exclude tree plantations from carbon project applicability criteria.	2. Open-source data used in the model should be validated by recognized institutions.	1. Uncertainty regarding the friction increase in protected areas (90%) applied in the model. No source for the 90% friction mentioned.	2. Provide clear methodology for handling plantation forests in carbon projects.	2. Ensure project-specific scenarios handle friction as part of VPA, rather than including it in the general tool.	source data used in the model is validated by appropriate institutions before being incorporated.	2. Transparent process needed for justifying Monte Carlo simulations used in the model, particularly for standard deviations in NRB/fNRB values.	1. Clearer justification is required for selecting NRB/fNRB values in simulations, especially the conservative choice of 5% for Indonesia with an SD of 100%.
12	02 August 2024 at 18:10 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406/cfi/GQUC6EGEQEXUFCPLCEQVXVHJPFQE63	Ulla Mauno	South Pole	u.mauno@southpole.com	1. Concern about lack of validation for data inputs and MoFuSS model. 2. MoFuSS model's complexity makes it difficult for widespread use. 3. Uncertainty in wide variance between latest submission and previous defaults.	1. Delay implementation of fNRB estimates until a broader scientific consensus is achieved. 2. Ensure model outputs are validated by Host Country governments through ground-truthed studies.	1. The data inputs for MoFuSS have not been validated, creating wide variance between submissions. 2. There is a need for more recent and publicly available datasets like ESA to improve accuracy.	1. Uncertainty around model use due to lack of validation by independent experts in biomass and forestry. 2. MoFuSS model outputs are subject to material changes when updated with new inputs or assumptions.	1. Support development of an open-access cloud-based version of MoFuSS to allow users to run localized data. 2. Encourage independent validation of the outputs.	1. Provide guidance for project developers using MoFuSS to interpret high standard deviations. 2. MoFuSS values should only be implemented after validation studies have been completed.	1. Provide a disclaimer in the report that MoFuSS outputs may change with updated inputs.	1. What will be the impact of updating MoFuSS with new biomass data? 2. Clarification needed on how high standard deviations should be interpreted for project developers.	1. Urgent need for validating MoFuSS data before widespread use. 2. The model should be adjusted to ensure local data is properly reflected in the results, especially in countries with reliable, updated data such as Rwanda.
13	02 August 2024 at 19:43 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406/cfi/I204PRIDB70JQTTXF655O6DTD6YTBE	Esther Adams	Proyecto Mirador	eadams@proyectomirador.org	1. Concern over the fact that validation was not part of the MoFuSS assignment, and the figures, which have high standard deviations, are being proposed for adoption. 2. The forest areas in the calculations should account for marginal forest areas being tapped first for fuelwood. 3. Default values derived from old datasets should be replaced by more accurate, project-specific values.	1. A rigorous academic review is needed to confirm the approach and ensure the inputs to MoFuSS are realistic. 2. Default values should not be implemented until marginal harvest is properly accounted for. 3. Allow PDs to implement project-specific, ground-truthed values.	1. MoFuSS-derived default values rely on datasets that are over 10 years old, potentially underestimating carbon intensity of fuelwood harvesting by not accounting for marginal forest harvests.	1. Uncertainty around the accuracy of MoFuSS values due to failure to account for other drivers of deforestation and marginal forest use for fuelwood.	1. PDs should have the ability to replace default values with project-specific inputs based on ground-truthed data. 2. Incorporate marginal forest harvest in calculations to improve accuracy.	1. MoFuSS-derived values should only be implemented once the tool is developed enough to allow PDs to define inputs more accurately.	N/A	1. Clarify if TOOL0 is still recommended for use with MoFuSS or if the methodology should shift away from [illegible] 2. Clarify the significance of incorporating dead wood in land clearance calculations.	1. Acknowledge the discrepancy between datasets (e.g., Rob Bailis 2024 study showing 1.25 kg/capita consumption vs. 1.11 kg/capita currently used) and adjust if appropriate.
14	03 August 2024 at 11:53 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406	ven Kolmetz	Project Developer Forum	sven.kolmetz@pd-forum.net	Same as 6 & 12								
15	05 August 2024 at 15:55 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406/cfi/SQOFO8OKAM7ORFAY0NG5CR01V7MLBC	Victor Costenoble	Freelance carbon consultant	victor@vico2s.com	1. The MoFuSS model provides accurate fNRB estimates based on the latest science but is incompatible with existing carbon methodologies. 2. The MoFuSS pixel-based approach differs from carbon methodologies where project intervention areas consist of only the households included in the project. This impacts how fNRB is evaluated. 3. Overconsumption in clean cookstove projects should lead to 100% of issuances, not fractioned. 4. The fNRB must be considered in the context of sustainability equilibrium, rather than per unit of biomass consumption.	1. Clarify in the MoFuSS paper that fNRB values cannot be used directly in carbon methodologies unless a change in the definition of the project scope is made. 2. Consider system-wide impacts of overconsumption reductions, where RB becomes available outside the project boundary.	1. The pixel-based approach of MoFuSS does not align with carbon methodology definitions of project areas. 2. More specific data needed for overconsumption and its impact on sustainability thresholds in biomass harvesting.	1. Misinterpretation of fNRB in the methodologies can lead to underestimations of emission reductions. The fNRB should decrease in project scenarios as sustainability equilibrium is reached.	1. Recommend re-evaluating fNRB in project scenarios to reflect overconsumption reduction and its contribution to reaching sustainability equilibrium in biomass consumption.	N/A	N/A	N/A	1. Methodological approaches should be revised to account for the full benefits of overconsumption reduction, which impacts fNRB calculations across entire landscapes, not just within project boundaries.
16	06 August 2024 at 06:27 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406/cfi/IUCUG20BHUNLVORF9KCXU7NFQYFQO5	Channabasava Parit	N/A	N/A	1. The wood fuel consumption data in the report (0.4 tons per capita/year) is inconsistent with the CLEAR methodology and the Gold Standard (0.8 - 0.9 tons per capita/year). 2. Omitting commercial and industrial wood fuel consumption leads to inaccurate assessments of wood consumption.	1. Update the wood fuel consumption data in the report to reflect more accurate values (0.8 tons per capita per year, as per CLEAR methodology). 2. Include commercial and industrial wood fuel consumption to provide a more comprehensive assessment.	1. The report relies on outdated wood consumption data (0.4 tons per capita/year), which significantly underestimates the harvested biomass and impacts the fNRB calculation. 2. Population growth and urbanization trends are not reflected.	1. fNRB calculations are highly sensitive to per capita wood consumption data; even slight changes in these figures drastically impact the fNRB percentage.	1. Suggest updating the base year for calculations (currently 2010) to more recent country-specific data, as population growth and urbanization trends may significantly alter wood fuel consumption.	1. Allow for more flexibility in project calculations by integrating country-specific reports and datasets to avoid over-reliance on default assumptions.	1. Consider adding more context on the implications of outdated population data and rapid urbanization trends for future projects.	1. What is the rationale behind using 2010 as the base year for calculations despite significant population growth and urbanization since then? 2. How can commercial and industrial consumption be integrated into fNRB calculations more effectively?	1. Questioning the financial viability of clean cooking technologies in many countries, as they may not have a significant impact in reducing GHG emissions. 2. Impact on rural communities when accounting for trees outside forests in fNRB calculations.
17	06 August 2024 at 07:40 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406	Eduardo Baixo	N/A	N/A	Same as 6 & 12								
18	06 August 2024 at 11:28 GMT+2	https://cdm.unfccc.int/public_inputs/2024/202406/cfi/CTDUGMRMO5GMZSSIXIS8WTYNX4DMS8	Samir Thapa	Modern Energy Cooking Services Program (Loughborough University)	s.thapa@lboro.ac.uk	1. Significant emissions from below-ground biomass are not considered in the MoFuSS model. 2. Limited data on the non-residential demand for wood and biomass consumption. 3. Issues with woodfuel values used for assessment in South Asia and SSA. 4. Urban fNRB estimates assume woodfuel originates from high-fNRB rural areas, which may not always be the case.	1. Consider reviewing literature on systemic effects of below-ground biomass emissions and provide snapshots of the net effect of woodfuel use. 2. Collect robust data on non-residential woodfuel demand and use of biomass for non-energy purposes.	1. There is limited data on non-residential demand and biomass consumption, especially in regions like small islands or tourist destinations. 2. Woodfuel consumption data in regions such as South Asia and SSA is potentially incorrect.	1. The assumptions made about the origin of urban woodfuel consumption from high-fNRB rural areas may lead to inaccuracies. 2. Lack of detailed data on biomass use for non-energy purposes may affect the accuracy of the estimates.	1. Propose that fuelwood and charcoal consumption be differentiated between urban and rural areas, with adjustments for the impact of rural-to-urban shifts in fuel consumption.	1. Recommend collecting data for specific locations and improving the understanding of regional non-residential biomass consumption, particularly for non-energy uses like building materials.	1. Clarify whether woodfuel values used for assessment in South Asia and SSA are correct, and adjust values accordingly if they are incorrect.	1. Clarify assumptions behind urban fNRB estimates and the methodology for determining woodfuel origins in rural areas.	1. Stacking of stoves and fuels significantly affects firewood consumption estimates, which in turn influences fNRB calculations. Provide guidelines for allowing project developers to adjust fNRB based on evidence of stacking in specific areas.
		https://cdm.unfc				1. Concerns regarding lack of independence in the review process for the MoFuSS model.	1. Appoint an independent team of experts to review the methodology and the model.	1. National-level data should	1. Uncertainty in how MoFuSS will handle non-energy biomass consumption, which affects fNRB estimates in certain regions.		1. Project developers should be allowed to adjust fNRB based on national data and dynamic biomass assessments.	1. Provide training and communication materials for	1. Clarify how the high standard deviations in MoFuSS outputs should be interpreted by developers.	1. Significant concerns about the lack of alignment between

19	07 August 2024 at 11:36 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/W9FQ3U4Q88DRKXCJNXZMB7VXQVY816	Rajesh Sundaresan	Carbon Impact Capital Pte. Ltd.	rajesh@carbonimpact.capital	2. The fNRB concept is flawed, leading to under-crediting for climate action projects. 3. The MoFuSS model has not been validated, as admitted by the authors, posing risks to credibility. 4. Need for resolving conflicts with national data in carbon projects.	2. Credits issued should reflect actual emissions reductions achieved, and a dynamic baseline of biomass consumption and supply should be used.	be compared to model inputs, and conflicts need to be addressed to ensure consistency between sovereign data and model outputs.	2. Model outputs do not align with common sense in several cases, especially in regions like India.	1. Consider dynamic, annually updated baselines based on real consumption and supply data to avoid over-reliance on unvalidated model assumptions.	2. Validation of the model outputs is essential before fNRB values can be used for carbon credit projects.	materials for project developers and verifiers on how to explain the rationale behind model outputs that do not align with common sense.	2. Provide clear guidance on how national authorities can adjust fNRB values based on sovereign data.	the lack of alignment between the model's fNRB outputs and actual on-the-ground realities in countries like India, leading to a disconnect between project results and the real impact on climate action.
20	07 August 2024 at 16:52 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/1LWXH7PY5	Thomas Hills	SCB Environmental Markets SA	thomas@starcb.com	Same as 7								
21	08 August 2024 at 14:33 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/R8468ACGMXFPQC9U6CEET9Y1S4RSNQ	Anantha Karthik Rajagopalan	UpEnergy Group	anantha@upenergygroup.com	1. General appreciation for the improvements made to the MoFuSS model and detailed explanations in the updated report. 2. Questions around the public availability timeline for the cloud-based version of MoFuSS. 3. Request for further engagement through workshops for technical understanding of MoFuSS among project developers.	1. Provide visibility on the public release timeline for the cloud-based MoFuSS version. 2. Organize workshops for project developers to improve understanding and use of the tool.	1. Need for more transparent data and results validation processes for public tools like MoFuSS.	1. Concerns about the use of outdated biomass data and its potential impact on fNRB accuracy, especially in fast-changing regions.	1. Incorporate the most recent biomass data available and validate the results with real-world data from national surveys and studies.	1. Recommend extending the stakeholder consultation process and reviewing the results more thoroughly before implementing the updated fNRB values.	1. Provide clearer communication on the limitations of the data used in the MoFuSS model and the expected impact of future updates.	1. Clarification on the timeline for public release of the cloud-based MoFuSS tool and how users can participate in its validation and refinement.	1. Request for comprehensive stakeholder engagement and validation processes to ensure that the fNRB values are widely accepted and accurately reflect real-world conditions.
22	08 August 2024 at 20:09 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/6T4DLA3S4HF5DYDS09Q1A0ALK89G0Z	Molly Brown	BURN Manufacturing	molly.brown@burnmfg.com	1. MoFuSS model is complex and lacks validation by DNAs. 2. Current timeframe for stakeholder engagement is too short. 3. The model's accuracy and results deserve broader scientific consensus.	1. Delay implementation of new fNRB estimates until consensus is achieved. 2. Extend review period to allow sufficient validation and stakeholder engagement. 3. Incorporate national data and validate through Host Country governments.	1. The data used in MoFuSS has not been validated by DNAs. The short timeframe provided for analysis limits the ability of DNAs to assess data quality and provide feedback on accuracy.	1. Uncertainty arises from the lack of independent validation from experts in biomass, forestry, and geo-imaging, which could affect the reliability of the model's outputs.	1. Further research should be commissioned into the implications of a marginal definition for fNRB, as current estimates may not fully consider non-renewability reductions.	1. Extend the deadline for feedback submission to ensure DNAs have time to assess data and provide comprehensive feedback. 2. Allow developers to use current protocols while MoFuSS results are validated.	1. Provide clearer guidance on how to interpret standard deviation values and their application to project contexts.	1. Clarification needed on how SD values can be applied to projects and how national data can be integrated into the MoFuSS model.	1. Significant concerns about the short review period and lack of independent validation. The model should be revised with local data before rolling out new estimates.
23	09 August 2024 at 04:55 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/3JFJ3NO9DAWOCV2V436WFPPKB7S6GX	Jonathan Norton	Vitol	JSN@Vitol.com	1. The latest proposed fNRB values differ significantly from previously approved CDM defaults and the Q3 2023 MoFuSS output (e.g., Myanmar's fNRB value reduced from 0.615). 2. The model and data inputs have not been sufficiently validated by DNAs due to the limited timeframe. 3. The results lack sufficient consideration of local and national variations.	1. Propose a third round of public consultation on fNRB values to reflect the need for further and broader surveys. 2. Cross-check and fully discuss fNRB values with DNAs. 3. Commission local or regional studies to incorporate localized inputs into the MoFuSS model.	1. The model lacks sufficient validation by DNAs due to limited analysis time. 2. Variations in local and national inputs were not fully incorporated into the results.	1. The current model uses generalized country-level assumptions rather than localized data, which could lead to inaccuracies and lack of private financing interest.	1. Incorporate local and national variations before default values are adopted. 2. UNFCCC should commission local studies to ensure localized data is integrated into the model.	1. Suggest releasing fNRB values by batches, as countries submit their inputs for proper validation and feedback from DNAs.	N/A	1. Clarification on how fNRB results will be validated across different countries with varying levels of data availability. 2. Question on procedures for DNA involvement in future data inputs.	1. Need for stronger engagement with DNAs to validate fNRB results before they are rolled out as defaults for carbon projects, given the significant differences between MoFuSS and prior CDM defaults.
24	09 August 2024 at 11:08 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/HZTK6I2S850Q3POXNO7UO1NUDTLEC2	Jonathan Norton	Vitol	Repetition: Same as 23									
25	09 August 2024	https://cdm.unfcc	Raphael Eberle	Sistema.bio	raphael@sistema.l	Same as 6 & 12								
26	09 August 2024 at 19:37 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/8K6MG5SRGFB9GB6XKRME6YXNRVR8LO	Matteo Massa	KTH Royal Institute of Technology	N/A	1. National and subnational fNRB values may not accurately reflect the conditions of smaller or localized projects. 2. The model does not differentiate between firewood and charcoal, leading to oversimplified fNRB assessments.	1. Allow project developers to use project-specific fNRB values supported by credible data sources. 2. Update the methodology to differentiate between firewood and charcoal based on their respective renewability impacts.	1. National-level data is insufficient for smaller projects, which may require more specific, localized data to reflect the actual impact on non-renewable biomass consumption.	1. Lack of differentiation between firewood and charcoal in the model leads to inaccurate assessments, as they have different renewability timeframes and procurement processes.	1. Recommend allowing project developers to calculate project-specific fNRB values. 2. Distinguish between firewood and charcoal for more accurate and fair assessments.	N/A	N/A	N/A	1. The inclusion of project-specific data and differentiation between biomass types would lead to more accurate and fair assessments of non-renewable biomass impacts in
27	09 August 2024 at 20:14 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/YVU258SL3X71IC8I15GGDX977E5ZA9	Nicolas Fouassier	Pamoja Mocambique LDA	nicolas@pamojacleantech.com	Same as 26								
28	09 August 2024 at 21:32 GMT+2	https://cdm.unfccc.int/public_inputs/2024/20240607/cfi/AYWWQRNUSAT5IRQMJKCD48PYD569M8	Erik Wurster	BioLite Energy	erik@bioliteenergy.com	1. The public commenting period for the updated fNRB values is too short for stakeholders to adequately review and provide feedback. 2. The MoFuSS model uses simplified assumptions for woodfuel consumption across residential, commercial, and industrial sectors, leading to inaccuracies. 3. The model does not account for non-energy wood demand and timber plantations in its calculations.	1. Extend the timeline for the stakeholder consultation process to 15 September 2024 to enable broader participation. 2. Use more localized and reliable data sources for calculating biomass consumption (e.g., regional studies, IEA, UN, PDDs). 3. Include non-energy wood demand in the MoFuSS model.	1. Current woodfuel consumption assumptions are based on limited data from only four SSA countries, with significant outliers impacting the results. 2. The exclusion of non-energy wood demand leads to an incomplete assessment of biomass consumption.	1. The MoFuSS model lacks clarity on how forest plantation data is excluded from its initial biomass stock calculations. Excluding non-energy wood demand leads to potential inaccuracies.	1. Recommend including a marginal fNRB calculation approach to account for the actual non-renewable biomass saved by project activities. 2. Apply marginal biomass offset methodology for more accurate climate impact measurements.	1. Propose conducting a stakeholder consultation meeting with experts from the Global South, academics, and carbon project developers to discuss the implementation of the marginality concept within MoFuSS.	1. Provide clearer explanations in the report for the treatment of non-energy wood demand and how forest plantation data is handled in the model.	1. Clarification on how the marginality concept can be incorporated into the MoFuSS tool to better reflect the climate impact of clean cooking and water projects.	1. The fNRB methodology should be updated to include the marginality concept to avoid undervaluing the climate impact of clean cooking projects. A stakeholder meeting is necessary to explore how this can be practically implemented in MoFuSS.