	CALL FOR INPUT	

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Document reference number and title: (Recommendation from the MEP to SBM020)
A6.4 MEP011-A04: Draft Methodological tool: Fraction of non-renewable biomass (version 01.0)

Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	COVER NOTE	Paragraph 5	4C reiterates the points made by CCA in its June 2025 public statement (https://cleancooking.org/news/cca-statement-on-the-cdm-executive-boards-decision-on-fnrb/). In particular, we welcome the decision of the Clean Development Mechanism (CDM) Executive Board at its 125th meeting to withdraw "TOOL30: Calculation of the fraction of non-renewable biomass" (fNRB) and approve the default national fNRB values derived using the June 2024 version of the MoFuSS model, now incorporated into "TOOL33: Default values for common parameters."	N/A
2	COVER NOTE	Paragraph 6	With respect to the Supervisory Body's seventeenth meeting (SBM 017), 4C supports the decision to allow the use of default fNRB values contained in TOOL33 for the transition of CDM activities to the Article 6.4 mechanism, pending the development of an Article 6.4-specific tool or new set of default values.	N/A

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3	COVER NOTE	Paragraph 8	4C welcomes the MEP's conclusion that the adoption of the MoFuSS-derived default fNRB values, developed under the CDM and approved by the CDM EB, represents the most appropriate interim solution currently available for the Article 6.4 mechanism. At the same time, 4C respectfully recommends that the MEP consider advising the Supervisory Body to allow Article 6.4 project proponents two additional options to determine fNRB (in addition to using the default fNRB values included in TOOL33), as included in the current draft of the CLEAR methodology: - Use customized project area (not aligned with national or subnational boundaries) using the online MoFuSS Default Scenarios (MoFuSS-DS) interface (https://mofuss.unam.mx/mofuss-ds/) following guidance provided by Ghilardi & Bailis (2024) (https://zenodo.org/records/14291479) about selecting proper fNRB values for project activities focused in urban areas; or - Where applicable, allow project proponents to run their own model with webMoFuSS using their own rigorously validated inputs, as stipulated in the model, which will be published in 2026. Allowing project proponents to parameterize the MoFuSS model using context-specific data would enhance accessibility, while potentially improving the accuracy of fNRB estimates in diverse national circumstances.	Allow Article 6.4 project proponents two additional options to determine fNRB (in addition to using the default fNRB values included in TOOL33), as included in the current draft of the CLEAR methodology: - Use customized project area (not aligned with national or subnational boundaries) using the online MoFuSS Default Scenarios (MoFuSS-DS) interface (https://mofuss.unam.mx/mofuss-ds/) following guidance provided by Ghilardi & Bailis (2024) (https://zenodo.org/records/14291479) about selecting proper fNRB values for project activities focused in urban areas; or - Where applicable, allow project proponents to run their own model with webMoFuSS using their own rigorously validated inputs, as stipulated in the model, which will be published in 2026.
4	COVER NOTE	Paragraph 8	The MoFuSS development team is continually refining the model to utilize the latest available data and advances in software. 4C supports the MEP proposal to review the Article 6.4 fNRB tool in no later than three years to determine whether new research and modelling improvements would be sufficient to undertake an update to the fNRB default values or even the underlying methods of the tool.	N/A