



## 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	This is a very weak statement of support for MoFuSS: "a scientific approach" – the language does not justify the emphasis placed on MoFuSS. I fully support MoFuSS but think a stronger statement here is warranted.	Rephrase to: "has been identified as currently the most robust scientific approach to defining fNRB"
2	COVER NOTE	Paragraph 6	Allowing activity participants to continue using TOOL33 or other default fNRB values during a transition period perpetuates over-crediting. Without an immediate switch to MoFuSS, inflated credits continue to be issued.	Remove the transition provision. Require immediate adoption of MoFuSS. Delete language permitting use of TOOL33 or other legacy fNRB values.
3	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Typographical error: "percentage" appears as two words.	Typographical error: "per centage" appears as two words.	Correct to: "percentage"

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4	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Footnote 4 on p7, Paragraph beginning "Stakeholders, including Designated National Authorities (DNAs)..."	This provision leaves fNRB determination subject to political will. DNAs have financial incentives to obtain more offsets and to attract projects to their host countries. fNRB values should be grounded in the best available science, not submitted by parties with conflicts of interest. While I applaud a 3-year review cycle where additional peer-reviewed approaches are considered, the submission of standardized baseline values by DNAs should not be permitted. Past experience with tools used to calculate fNRB has demonstrated the risks of this approach.	Remove all language permitting DNAs to submit standardised baseline values for fNRB (i.e., remove reference to A6.4-PROC-METH-002 and the associated sentence). Retain the 3-year review, but insist any suggested approaches be peer-reviewed in high quality publication.
5	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Paragraph 14 beginning "Activity participants shall use national values..."	The impact of fuel collection can vary significantly within a country. A cookstoves project located in a region with diminishing forest cover can have significantly more benefit than if it were in a different area of the country. The current drafting does not make clear whether activity participants may use more geographically specific values where their project operates in a defined sub-national area (e.g., only urban contexts or specific districts). This ambiguity could lead to inappropriate application of regional or national averages. If a project only operates in specific districts or urban areas, a more specific fNRB from MoFuSS should be used. Further, fuelwood and charcoal baselines should be treated differently as charcoal is often derived from various locations throughout the country, rather than locally collected firewood. Ghilardi, A., & Bailis, R. (2024). Updated fNRB Values for Woodfuel Interventions. Zenodo. <a href="https://doi.org/10.5281/zenodo.14291479">https://doi.org/10.5281/zenodo.14291479</a> . Provides more specific values in their Google Drive supplement	Add a clarifying sentence such as: "Where a project operates exclusively within a specific sub-national area (e.g., urban zones or defined administrative districts), activity participants should use more specific MoFuSS-derived fNRB values for fuelwood baselines, but retain the national value for charcoal baselines"

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6	DEFINITIONS	Paragraph 6(b)(i)b. Under definition of Renewable biomass for forest lands	The definition of renewable biomass should be about the biomass not the management practices. For a single cookstoves project, for example, a portion of biomass used may be renewable and a portion non-renewable for biomass taken from the same forest. This may be the case regardless of whether there is active management of that forest.	Change from: “Sustainable management practices are undertaken that are designed to ensure, in particular, that the level of carbon stocks does not systematically decrease over time (carbon stocks may temporarily decrease due to harvesting); and” To: “Biomass use that does not systematically decrease carbon stocks over time (carbon stocks may temporarily decrease due to harvesting); and” Or alternatively, this definition from the CLEAR cookstoves methodology ( <a href="https://cleancooking.org/wp-content/uploads/2025/12/CLEAR-methodology-Aug2025-DA-included.pdf">https://cleancooking.org/wp-content/uploads/2025/12/CLEAR-methodology-Aug2025-DA-included.pdf</a> ) has a clear definition for fNRB that could be adopted here: “Geographically specific parameter that estimates the percentage of wood that is harvested beyond the landscape’s rate of regeneration meaning that the wood is not a carbon neutral fuel.”
7	DEFINITIONS	.	See our reasoning for changing the definition of Renewable biomass just above.	Change from: “The fraction of woody biomass saved by the Article 6.4 activity during year y that cannot be established as renewable biomass.” To the definition used by the Clear methodology: “Geographically specific parameter that estimates the percentage of wood that is harvested beyond the landscape’s rate of regeneration meaning that the wood is not a carbon neutral fuel.”