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Name of submitter	teddy
Affiliated organization of submitter	Cookswell Jikos Limited
Email of submitter	cookswelljikos@gmail.com
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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	INTRODUCTION	Section 1 – Introduction (Scope; Entry into force and validity)	We welcome the development of a dedicated methodological tool for determining the fraction of non-renewable biomass (fNRB) under the Article 6.4 mechanism. A transparent and standardized approach to fNRB is essential for safeguarding environmental integrity while enabling credible mitigation outcomes from biomass-based energy interventions in contexts where biomass remains a dominant component of household and productive energy use. In Kenya, however, biomass energy is frequently framed as a primary driver of forest degradation and loss. While unsustainable extraction does occur, this framing risks obscuring the more complex social, economic, and political drivers shaping biomass use and land-cover change. A substantial proportion of biomass used for energy in Kenya is sourced from non-forest systems, including farm forestry, dryland woodlands, rangelands, shrublands, and managed woodlots. Moreover, Kenya's drylands, which constitute approximately 70% of the national land area, are experiencing significant woody vegetation change driven by bush encroachment and land-use transitions rather than fuelwood demand alone. Forest loss and degradation in Kenya are more closely linked to structural factors such as land clearing for expanding agriculture, tenure insecurity, and the interaction between biomass energy markets and broader policy incentives, including agricultural and energy subsidies. In some cases, subsidised or under-regulated biomass energy markets intersect with land-clearing activities, where woody biomass is treated as a by-product of agricultural expansion rather than a managed energy resource. These dynamics highlight that fNRB is not solely a biophysical parameter, but one that reflects governance arrangements, land-use trajectories, and social equity considerations. In this context, the proposed tool has the potential to play an important enabling role. By providing clear default fNRB values and methodological consistency, it can support a transition away from informal and extractive biomass use toward sustainably grown, managed, and socially embedded biomass supply systems, including agroforestry, community-managed	We therefore recommend that the Introduction more clearly articulate that the purpose of this tool is not only to improve emissions accounting, but also to support policy-relevant differentiation between renewable and non-renewable biomass pathways in diverse land-use contexts. Such framing would enhance the relevance of the tool for countries like Kenya, where climate mitigation, land restoration, and equitable energy access are tightly coupled, and where improved fNRB accounting can help align Article 6.4 activities with long-term sustainable land and energy transitions.

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			woodlands, and restoration-linked biomass production. Explicitly recognising this potential in the Introduction would help avoid reinforcing simplistic narratives that position all biomass energy as inherently unsustainable, and instead encourage investment in sustainable biomass as a legitimate component of the national energy mix.	