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Name of submitter	David Kitt
Affiliated organization of submitter	DelAgua
Email of submitter	david.kitt@delagua.org
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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	Cover Note Paragraphs 7–8; Section 5 Paragraph 14; Footnote 4	The tool provides only national and regional default fNRB values. Sub-national defaults would materially improve accuracy and integrity, as fNRB can vary significantly within countries due to differences in forest cover, biomass demand, and regeneration rates. MoFuSS is a spatially explicit model capable of producing sub-national values. The CDM Methodology Panel had already begun work on sub-national defaults. There is no technical barrier to resuming this work — it should not wait for the three-year review cycle.	Add text requesting the MEP, in conjunction with the MoFuSS research group, to develop sub-national default fNRB values within the scope of the current tool and to recommend an approach for their inclusion prior to the scheduled three-year review.
2	COVER NOTE	Cover Note Paragraph 8; Section 5 Paragraph 14; Footnote 4	"Footnote 4 mentions that stakeholders may propose revisions to default values or submit new tools. However, it does not mention the possibility of applying improved, locally sourced input data to the MoFuSS model to generate more accurate national or sub-national defaults. This omission discourages countries and stakeholders from investing in better primary data, since there is no clear pathway to translate improved inputs into usable fNRB values under this tool."	Add text clarifying that DNAs and stakeholders may develop national or locally applicable studies — including research on MoFuSS input parameters such as biomass stock, consumption rates, and population data — and apply such updated parameters to the MoFuSS model to obtain more accurate fNRB defaults, subject to validation by a VVB and approval by the Supervisory Body.

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3	COVER NOTE	Cover Note Paragraphs 5, 7	MoFuSS assumes a per capita fuelwood consumption of approximately 0.4 tonnes/person/year. However, Kitchen Performance Test (KPT) data submitted by project developers across Sub-Saharan Africa consistently shows significantly higher consumption (e.g. ~0.71 tonnes/person/year for SSA). Using lower consumption inputs leads to underestimation of demand pressure and, consequently, underestimation of fNRB.	Incorporate KPT data submitted by the PD Forum and other validated country-specific surveys into the MoFuSS input assumptions, or adjust the default consumption parameters to reflect the wider evidence base. At minimum, publish the consumption assumptions used so that stakeholders can assess their accuracy for specific geographies.
4	COVER NOTE	Cover Note Paragraphs 7–8; Section 5 Paragraph 14; Footnote 4	The default fNRB values have been adopted without formal validation or consultation with DNAs of the host countries concerned. DNA engagement would improve the accuracy of input assumptions and strengthen the legitimacy of the resulting defaults.	Establish a structured consultation process with DNAs prior to finalising the default values, enabling host countries to review and provide input on the data and assumptions underlying their national fNRB values.
5	COVER NOTE	Cover Note Paragraphs 5, 7; Section 5 Paragraphs 13–15	Several input datasets used in the MoFuSS model are over a decade old. Presenting model outputs as authoritative national defaults without ensuring the currency of underlying data risks undermining credibility. Land cover, population distribution, and biomass stocks have changed materially in many countries since these datasets were compiled.	Require that default values are derived from input data no older than 10 years at the time of publication. Where more recent data are available (e.g. post-2020 land cover, updated population estimates), these should be incorporated. Enable activity participants to submit updated, locally validated data for use in model runs.

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6	DEFINITIONS	Paragraph 6(b), 6(c)	The definition of fNRB in the tool needs to be aligned with the definition used in the MoFuSS model from which the default values are derived. The tool defines renewable biomass (Paragraph 6(b)) using criteria originating from CDM EB23 (2006), including conditions on forest management, carbon stock maintenance, and regulatory compliance. It then defines fNRB (Paragraph 6(c)) as the fraction of woody biomass saved that ""cannot be established as renewable biomass"" — implying a local-level, pool-inclusive assessment. However, MoFuSS defines fNRB differently: as the relative amount of wood harvested above the landscape's natural rate of regeneration, calculated at landscape level using above-ground woody biomass only. MoFuSS does not include soil organic carbon, belowground biomass, or dead organic matter in its calculations (Ghilardi & Bailis, 2024, paras. 2.6.1–2.6.2). Using one definition in the normative text and a different definition in the underlying model creates ambiguity and risks methodological incoherence.	Align the definition of fNRB in Paragraph 6(c) with the MoFuSS definition, specifying: (a) The spatial scope (landscape-level, not local/project-level); (b) The carbon pools included (above-ground woody biomass only, consistent with MoFuSS). Alternatively, add an explanatory note acknowledging the difference and clarifying that the default values reflect the MoFuSS scope.
7	APPLICABILITY	Paragraphs 8–10; Section 5 Paragraphs 13–14; Footnote 4	MoFuSS is a dynamic, spatially explicit model that integrates land cover change, biomass regeneration, demographic pressure, and urban-rural demand gradients. It can produce sub-national, project-boundary, and temporally updated fNRB values that reflect actual landscape conditions — rather than static national snapshots. The ICVCM and Gold Standard have already adopted MoFuSS-derived values as the basis for fNRB determination. Aligning this tool with that approach would promote inter-standard harmonisation and allow activity participants to use the most accurate available evidence.	Include a provision allowing activity participants to propose MoFuSS-derived fNRB values for specific project areas, provided the model run is transparently documented, uses robust and current reference data, and is validated by the VVB.

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8	APPLICABILITY	Paragraphs 8–10; Section 5 Paragraphs 13–14; Footnote 4	The tool lacks flexibility to incorporate project-specific or sub-national fNRB values generated using MoFuSS. Gold Standard already supports MoFuSS-derived defaults within its framework. The absence of a similar provision under Article 6.4 creates an unnecessary divergence between standards and limits the ability of activity participants to use more accurate values where these are available.	Include a clause allowing activity participants to use MoFuSS-derived fNRB values, subject to transparent documentation of model inputs, configuration, and results, and alignment with host country and UNFCCC validation frameworks.
9	APPLICABILITY	Paragraphs 8–10; Section 5 Paragraphs 13–14; Footnote 4	The tool does not reference Web MoFuSS (https://webmofuss.unam.mx/) or the User-Defined Scenario (UDS) functionality that enables users to generate fNRB values for custom project boundaries using locally validated input parameters. This is a significant omission. Web MoFuSS is the publicly accessible implementation of the same peer-reviewed model that underpins the default values in this tool. It allows users to define custom geographies, input locally sourced data (biomass stock, consumption rates, population), and produce spatially explicit fNRB estimates tailored to specific project areas. The current tool locks activity participants into a national default even where the same accepted model, run with better local data, demonstrates that the national average does not reflect conditions in the project area. This reduces accuracy without improving conservativeness.	Add a new paragraph under Section 5 providing an additional route for determining fNRB, along the following lines: ""Activity participants may determine fNRB values using the Web MoFuSS platform (or its successor), provided that: (a) The model run uses the most recent publicly available version of MoFuSS; (b) The project boundary or sub-national area is clearly defined and justified; (c) Any locally derived input parameters are documented, referenced, and validated by the VVB; (d) The model configuration, inputs, and results are transparently reported in the project design document; (e) The resulting fNRB value does not exceed the national default in Table 3 unless supported by a peer-reviewed study or DNA-approved data."" This preserves conservativeness (via the national cap in condition (e)) while enabling more accurate, locally relevant values — using the model the MEP has already endorsed.