



## CALL FOR INPUT

Name of submitter	NESTA NYAMONGO
Affiliated organization of submitter	FIE CONSULT
Email of submitter	n.nyamongo@fieconsult.co.ke
Date of submission	02/08/2026

### 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	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Section: 5 – Default values for fraction of non-renewable biomass Paragraphs: 13–15 and Table 3 (Kenya national value) Related definition: Section 2.2(b) – Renewable biomass	The default national fNRB value of 29% assigned to Kenya in Table 3 appears to be methodologically inconsistent with Kenya’s most recent Biennial Transparency Report (BTR) submitted to the UNFCCC. Under Section 2.2(b) of this tool, biomass is considered renewable only where carbon stocks do not systematically decrease over time. However, Kenya’s official reporting to the UNFCCC clearly demonstrates systematic carbon stock decline associated with woodfuel use, evidenced by the scale and growth of LULUCF emissions. This creates a methodological contradiction classifying 71% of Kenya’s woodfuel as renewable.	The tool should allow, or require, adjustment of national default fNRB values where official UNFCCC-submitted national inventory data (e.g. BTRs, NDC technical annexes) demonstrate evidence of systematic carbon stock decline linked to woodfuel extraction. The supervisory body should review the 29% value in light of Kenya’s BTR LULUCF data.