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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	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	15	"Kenya has been given a Non Renewable Biomass Fraction of 29%. However, Kenya's BTR reports (Page 2, Table 1.1) that 46 million tonnes of CO2 derive from Land Use Change and Forestry (which includes wood used for cooking). The annual growth rate in LULUCF emissions is reported at 20% (Page 3, Table 1.2). LULUCF currently represents 41% of the county's total GHG emissions of 113 million tonnes of CO2. Put another way, emissions from deforestation are 70% of those from all other sources put together. In Europe, there is a push towards fuel switching to electricity, partly because it is 47% generated from renewable sources (seen as a good thing). In Kenya, according to the UNFCCC, wood fuel in Kenya is 71% renewable (by definition, if it is 29% non-renewable). By this measure, we should have a push towards wood fuel in Kenya, as a great fuel source. However, the opposite is the case, as the fuel market is so destructive to the deforestation position - noted as driving such a large part of the country's emissions. With this conundrum in mind, I would urge the Board to Review its NRB figure for Kenya in light of the BTR, as they cannot both be correct."	Review the fNRB fraction for Kenya, in light of the BTR.