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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	Kenya 29	This submission challenges the adequacy of Kenya's current fNRB estimate of 29% and calls for ground validation exercises to accurately assess biomass sustainability. The current methodology fails to capture the reality of unsustainable harvesting practices that threaten indigenous tree species, accelerate forest degradation, and contribute to altered climate patterns. 1. CRITICAL GAP BETWEEN OFFICIAL fNRB AND GROUND REALITIES The stated fNRB of 29% for Kenya does not accurately reflect actual conditions in biomass harvesting zones. This discrepancy has significant implications for: Carbon accounting accuracy under CDM/PACM and voluntary carbon projects National climate commitments and NDC calculations Forest conservation policy effectiveness Community livelihoods dependent on sustainable forest resources We strongly recommend that the Methodology Panel require mandatory ground validation exercises as part of fNRB determination, rather than relying solely on national forest inventory data and modeling. 2. INDIGENOUS TREE REGENERATION FAILURE A critical factor absent from current fNRB calculations is species-specific regeneration capacity. Field observations in Kenya reveal: Most indigenous tree species rarely regenerate once harvested for charcoal or fuelwood Slow-growing hardwood species lack the regeneration rates assumed in national forestry statistics Harvesting pressure exceeds natural regeneration capacity, creating a ""biomass mining"" scenario rather than sustainable harvesting Seedling establishment is inhibited by changed microclimate conditions, grazing pressure, and altered soil conditions post-harvest This effectively means that for many indigenous species, the fNRB is higher and not 29%. 3. MARKET DYNAMICS DRIVING UNSUSTAINABILITY The charcoal and fuelwood markets create perverse incentives that accelerate unsustainable harvesting: Quality-Driven Species Selection: Charcoal quality and burn characteristics are directly determined by wood species and carbonization process Dense hardwoods produce high-quality, long-lasting charcoal Lighter woods produce	5. METHODOLOGICAL RECOMMENDATIONS The UNFCCC Methodology Panel should consider the following enhancements: 5.1 Species-Specific Assessment Disaggregate fNRB calculations by dominant species used in charcoal/fuelwood production Incorporate species-specific regeneration rates and growth patterns Weight fNRB values according to actual species harvested, not just overall forest cover 5.2 Mandatory Ground Validation Require periodic field verification in primary biomass harvesting zones Include stakeholder input from charcoal/wood traders who observe species availability trends Document changes in sourcing patterns, distances, and species preferences over time 5.3 Market-Based Indicators Monitor charcoal quality changes as indicator of species depletion Track price changes that may reflect scarcity of preferred species Survey producer and trader observations on wood availability 5.4 Regeneration Capacity Assessment Conduct regeneration surveys in post-harvest areas Measure actual seedling establishment and survival rates Account for anthropogenic pressures (grazing, agriculture conversion) that prevent regeneration 5.5 Dynamic fNRB Values Recognize that fNRB is not static and increases as forests degrade Implement regular updating mechanisms based on ground conditions Create early warning indicators for transition from sustainable to unsustainable harvesting

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			charcoal that burns faster and hotter with inferior market value Market Preference for Vulnerable Species: Traders and producers naturally prefer hardwood species for superior product quality These preferred species typically have: Slower growth rates Lower regeneration capacity Higher vulnerability to overexploitation This creates additional anthropogenic pressure on already vulnerable tree populations, a factor not adequately captured in current fNRB methodologies. 4. OBSERVABLE IMPACTS OF UNSUSTAINABLE BIOMASS HARVESTING Ground-level evidence demonstrates: Forest degradation in traditional harvesting areas Species composition shifts as preferred hardwoods become locally extinct Altered climate patterns at loc The practical realities of biomass harvesting in Kenya demand a more rigorous, ground-truthed approach to fNRB determination. The current 29% figure does not reflect the unsustainable extraction of indigenous hardwood species, their limited regeneration capacity, or market dynamics that accelerate forest degradation. We urge the UNFCCC Methodology Panel to: Require ground validation exercises as mandatory components of fNRB assessment Incorporate species-specific regeneration and harvesting data Develop mechanisms for stakeholder input from the charcoal/wood value chain Create dynamic updating procedures that reflect changing forest conditions Recognize that fNRB is and should be higher for slow-regenerating indigenous species under current harvesting pressure The credibility of carbon accounting and the effectiveness of climate mitigation efforts depend on accurate representation of actual conditions on the ground. I strongly recommend that the Methodology Panel require mandatory ground validation exercises as part of fNRB determination, rather than relying solely on national forest inventory data and modeling which is based on assumptions.	