



CALL FOR INPUT

<i>Name of submitter</i>	Vinay M Deodhar
<i>Affiliated organization of submitter</i>	None
<i>Email of submitter</i>	vdeodhar@gmail.com
<i>Date of submission</i>	21/02/2026

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	COVER NOTE	4	Any model which is expected to represent the real situation on the ground must not be relied on singularly. It has to be corroborated with measurements on the ground. It is not clear whether this has been done in all the host countries for which the fNRB fractions have been approved.	The study of biomass available in the locality of the project or state/province from where it will be collected for use by the project or proposed to be replaced with mitigation measures should be conducted to stimate the fNRB value.

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)
2	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	14	<p>1. It is not appropriate to have a single value for fNRB for large countries like India, China, which have several geo-climatic zones. 2. The MoFUSS model relies entirely on the satellite based assessment of biomass. This should be corroborated by ground-based field studies to assess biomass availability over seasons. 3. The fNRB is an indication of deforestation of a region over time. Low fNRB values should therefore indicate a stable or increasing forest cover. 4. For countries like India where the fNRB values have significantly shrunk (from 85% in previous version to 7% in the latest version of the Tool 30), should indicate significant jump in the forest cover over the past few years. This is not the case in reality. 5. These points therefore necessitate inclusion of ground based studies as an essential requirement. The value that prevails should be preferred over the default value given in Table 3 of the proposed tool.</p>	<p>For projects which apply methodologies requiring calculation of fNRB values to estimate baseline emissions should as a first choice carry out an on-ground study of the availability of biomass. This should be done over the crediting period and if the project proponent has chosen renewable crediting period, the biomass study to estimate fNRB value should be done at every renewal of the crediting period.</p>