Name of submitter	MUNYAZIKWIYE Faustin, UNFCCC National Focal Point
Which Party do you represent?	Rwanda
Email of submitter	fmunyazikwiye@rema.gov.rw
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	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 | Table.3 | Rwanda wishes to highlight structural factors that explain its historically high fNRB values and should be carefully considered to ensure reality and environmental integrity. Two key parameters are particularly relevant for Rwanda: 1. Very high dependence on biomass for energy 2. Biomass demand exceeding sustainable supply A large majority of households and public institutions (e.g: schools, prisons,...) in Rwanda rely on firewood and charcoal as their primary cooking fuels. Urban charcoal demand places additional pressure on biomass resources, as charcoal production requires several tonnes of wood to produce one tonne of charcoal, significantly increasing overall biomass extraction. At the same time, national biomass consumption consistently exceeds the Mean Annual Increment (MAI) of forests and plantations. This imbalance results in a substantial share of harvested biomass being non-renewable, directly contributing to a high fNRB value. National assessments and studies for Rwanda consistently demonstrate: • High reliance on firewood and charcoal for cooking; • Limited forest regrowth relative to national demand; • Significant and persistent pressure on biomass resources. Recent evidence from the Seventh Integrated Household Living Conditions Survey (EICV7, 2023/2024) further confirms this situation. At the household level: • 75.0% of households rely on firewood as their main cooking fuel; • 18.8% use charcoal; • Only 5.4% use gas or biogas (including LPG), indicating limited penetration of modern cooking fuels. Marked urban–rural disparities are observed: • In urban areas, 32.1% of households use firewood, 50.6% use charcoal, and 16.8% use gas or biogas; • In rural areas, 92.5% of households rely on firewood as their primary cooking fuel. These figures clearly demonstrate that traditional biomass fuels continue to dominate household cooking nationwide, particularly in rural areas, reinforcing sustained pressure on forest resources. | On behalf of Rwanda, the Designated National Authority (DNA) respectfully requests that the data and evidence outlined above, together with the referenced national sources (including EICV7, the National Forest Inventory, Forest Cover Mapping 2019, and forestry statistics and land-use maps), be duly considered in the refinement of the draft fNRB tool. Rwanda encourages the recalculation and adjustment of its fNRB value based on these nationally representative data to ensure that the final methodology yields realistic, conservative, and country-appropriate fNRB estimates consistent with on-the-ground conditions on country specificity. |