



## CALL FOR INPUT

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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	COVER NOTE	Paras 2–8 (Purpose; Key issues and proposed solutions)	The Cover Note correctly identifies the role of default fNRB values in facilitating Article 6.4 activities. However, it places strong emphasis on a single modelling approach (MoFuSS) without sufficiently highlighting the transitional nature of these defaults or the legitimate role of alternative conservative approaches. Explicit recognition that defaults are facilitative instruments—not scientific ceilings—would improve usability and reduce unnecessary barriers for activity developers and their consultants, particularly in complex or non-traditional biomass supply chains.	Insert the following sentence after paragraph 8: “The default values provided by this tool are intended to facilitate implementation and reduce transaction costs and shall not preclude the use of alternative conservative approaches or updated data sources where such approaches are transparently justified and consistent with the principles of environmental integrity.”
2	INTRODUCTION	Paras 1–2 (Scope)	The scope appropriately defines the tool as providing default values for fNRB. However, the current wording does not explicitly recognize that the tool may be applied across diverse activity contexts, including integrated energy systems, logistics chains, and site-specific applications. Clarifying this flexibility would improve consistency of application and avoid overly narrow interpretations that could limit eligible activity types.	Add the following sentence at the end of paragraph 1: “The application of this tool may extend to diverse activity contexts where woody biomass use or displacement occurs, including site-specific, asset-specific, or integrated energy and logistics systems, as defined in the applicable mechanism methodology.”

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3	DEFINITIONS	Para 6(b) (Renewable biomass) and Para 6(c) (Fraction of non-renewable biomass)	The definitions of renewable biomass and fNRB are comprehensive but rely heavily on land-based sustainability conditions that may be difficult to evidence at project level. In practice, activity participants rely on defaults precisely to avoid such granular demonstrations. Clarifying that the use of default fNRB values does not require project-specific proof of renewability characteristics would reduce uncertainty and verification burden.	Add the following sentence at the end of paragraph 6(c): “Where default fNRB values from this tool are applied in accordance with the applicable mechanism methodology, activity participants are not required to demonstrate compliance with the renewable biomass conditions at the project level for the purposes of determining fNRB.”
4	APPLICABILITY	Paras 8–11	The applicability section appropriately establishes that use of the tool must be explicitly referenced by the mechanism methodology. However, it does not sufficiently clarify the hierarchy between this tool and methodology-specific provisions. A clearer statement would reduce interpretative risk and facilitate efficient project design by consultants.	Replace paragraph 11 with the following text: “Where the requirements of the applicable mechanism methodology differ from, supplement, or further specify the provisions of this methodological tool, the requirements of the mechanism methodology shall take precedence, and the provisions of this tool shall be applied only to the extent relevant and consistent with that methodology.”
5	NORMATIVE AND INFORMATIVE REFERENCES	Para 12	The current reference list is appropriate but narrowly focused. In sectors characterized by international operations, cross-border supply chains, or non-traditional biomass uses, additional contextual references may support more accurate interpretation without introducing new binding requirements.	Add a new sub-paragraph to paragraph 12: “(c) Internationally recognized sectoral guidance, lifecycle assessment standards, or sustainability frameworks may be used as informative references where relevant, provided that such references do not create additional mandatory requirements beyond those specified in this tool or the applicable mechanism methodology.”
6	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Paras 13–15; Tables 2 and 3	The mandatory hierarchy requiring national values where available may lead to conservative distortions where national values are outdated, statistically uncertain, or not representative of specific supply chains. Allowing limited flexibility to apply regional values in justified cases would improve robustness and reduce unintended bias.	Amend paragraph 14 as follows: “Activity participants shall use national values where these are provided in Table 3 and otherwise use the appropriate regional (continental) values provided in Table 2, unless the applicable mechanism methodology or a transparent and conservative justification demonstrates that regional values better represent the biomass supply context of the activity.”

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7	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Paras 13–15; footnote 4	Footnote 4 correctly allows for revisions but frames this primarily as a regulatory process. Explicit recognition of the role of activity participants and consultants in proposing improvements would incentivize methodological innovation.	Add the following sentence to footnote 4: “Such proposals may be initiated by activity participants or their authorized representatives and may include simplified or sector-specific approaches that demonstrably improve accuracy or conservativeness.”
8	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Para 15 Tabel 3	The absence of uncertainty values is noted but unresolved. To avoid implementation delays, interim guidance on conservative handling of uncertainty would be beneficial.	Add a new paragraph after paragraph 15: “Pending the inclusion of explicit uncertainty values, activity participants shall apply the default fNRB values conservatively and may include sensitivity analysis or conservative adjustments where required by the applicable mechanism methodology.”