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 4–8 (Pages 1–2) Section 5, Paras 13–15 (Page 7)	The tool relies almost entirely on legacy CDM TOOL33 values derived from the MoFuSS model (June 2024 version). No independent validation or country-level reassessment has been conducted under the Article 6.4 framework. This assumes that historical biomass dynamics and harvesting patterns remain unchanged, which is unlikely given population growth, urbanization, and fuel substitution trends. This creates a structural risk of systematic underestimation of non-renewable biomass, particularly in rapidly developing countries.	In this context, we recommend that the MEP allow sufficient flexibility under Article 6.4 to use scenario-based and localized MoFuSS calculations where appropriate, rather than relying exclusively on fixed default values until the next revision of the tool in three years. While default values provide simplicity and predictability, dynamic and localized modelling should remain possible where it improves accuracy and environmental integrity.
2	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Table 3: National Values (Pages 8–9)	Several countries (e.g., India 7%, Armenia 1%, Azerbaijan 1%, Djibouti 1%) are assigned extremely low fNRB values that appear inconsistent with: 1. High rural biomass dependence, 2. Documented forest degradation, and 3. Large informal fuelwood markets. For India, extensive evidence indicates continued pressure on forest and non-forest biomass resources. A default value of 7% likely underrepresents actual non-renewable harvesting, leading to systematic undervaluation of emission reductions (ERs).	Require justification notes for values below a defined benchmark (e.g., <10%) and permit the use of country-specific studies and remote sensing data to override unrealistically low defaults.

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3	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Section 5, Paras 13–14 (Page 7)	The tool mandates national or continental values, ignoring strong intra-country variation in forest cover, fuelwood scarcity, and management practices. In large countries (e.g., India, Brazil, Indonesia), regional differences are substantial. Uniform national values risk both over-crediting and under-crediting.	Enable standardized sub-national fNRB values and permit DNAs to submit region-specific baselines.
4	DEFINITIONS	Section 2.2 (Pages 5–6)	Definitions of renewable biomass rely on compliance with national regulations, yet the default values do not systematically integrate official forest inventories, satellite monitoring, or national energy surveys.	Require periodic cross-checking with national statistics.