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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	Table 2 and 3	Due to high transaction costs and small total volumes, it is not tenable for small island states to finance consultants to write fnrb reports. Please provide a realistic default value. It is highly problematic in terms of equal access to the mechanism to provide a very low average fnrb for Asia (by averaging with the low values in India, China, Turkey, etc.) and NOT provide adapted national levels for most of the Asian Small Island Countries. Please provide at least sub-regional default values for pacific island nations.	Default Value in Table 2 for Pacific Island States

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2	DEFINITIONS	3.4.	The MoFUSS model is missing critical parameters in the determination of the correct value. Most importantly, it is not informed by the differentials in political power between land owners (who benefit from low fnrb) and wood fuel users (who benefit from high fnrb). It may be advisable to delegate authority on fnrb definition to the DNAs directly, as such political questions between conflicting national stakeholder interests are not in scope for international scientific community to comment on. Further, MoFUSS does not consider the positive impact on carbon storage when less than the sustainable amount is harvested from a forest and underestimates leakage through international charcoal markets.	Define pragmatic, rounded default values and delegate authority to define standardized national and subnational baselines to DNAs