



CALL FOR INPUT

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Document reference number and title: (Recommendation from the MEP to SBM020)

A6.4 MEP012-A04: Draft Methodological tool: Fraction of non-renewable biomass (version 02.0)

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	NORMATIVE AND INFORMATIVE REFERENCES	Section 3.1, Para 8 (Definition of fNRB)	Current \$fNRB\$ logic focuses on "avoided loss." By including HWP, the tool acknowledges that harvesting for long-lived products is a sustainable use of biomass that creates a "sink" outside the forest, which should not be penalized as non-renewable.	Ensure the definition of \$fNRB\$ accounts for "carbon storage in HWP" as a form of renewable biomass utilization.
2	NORMATIVE AND INFORMATIVE REFERENCES	Section 5, Para (MoFuSS Model)	MoFuSS (Modeling Fuelwood Savings Scenarios) often assumes subsistence use. In developing countries, intensive land use for HWP increases the "Natural Regeneration" rate (\$MAI\$), which should lower the \$fNRB\$ and increase the credit potential for managed forests.	Request transparency on how the MoFuSS model accounts for intensive silviculture vs. subsistence harvesting.
3	NORMATIVE AND INFORMATIVE REFERENCES	Section 5 (Default Values)	The default values in the Annex (e.g., for provinces in Zambia or Vietnam) are static. If a project introduces intensive HWP production that improves forest health, they should be allowed to use a project-specific \$fNRB\$ that reflects their superior land management.	Provide a pathway for Project Proponents to update default sub-national values if they implement intensive land management.

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4	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Para 15 (DNA Submission of Values)	In many developing countries, the \$fNRB\$ is high because of unmanaged use. Highlighting that intensive HWP use is a solution to non-renewable harvesting helps align carbon finance with industrial development.	Encourage DNAs to submit values that specifically distinguish between "unmanaged degradation" and "planned HWP extraction."
5	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Annex 1 (Default Values Table)	This allows HWP projects to argue that their "Managed" \$fNRB\$ is significantly lower, thereby proving their "Additionality" and "Net Removal" capability compared to the regional average.	Add a "Technical Note" stating that these values represent a conservative baseline for unmanaged areas.