

## **Comments for proposed Methodology for Sustainable Grassland Management (SGM)**

### i) Selected Carbon pools and emission sources

Below Ground biomass should be taken as a compulsory carbon pool for monitoring at least during project crediting period as it is a major percentage of living biomass for any grassland ecosystem and is an indicator of the health of the grassland. It can be monitored indirectly by measuring above ground biomass outturn in designated sample plots as conversion factors of above ground to below ground biomass exists for grasslands in different agro-ecological zones.

### ii) Leakages

The assumptions made for choosing the scenarios for leakage emissions are very case-specific and needs to be more general. It seems that the underlying presumption is that over-grazing is the major cause of grassland degradation which may not be the case as per the applicability conditions.

### iii) Stratification of project area for sampling

The basis of stratification is not well defined

### iv) Use of genetically modified varieties

The methodology should expressly state its position on use or seeding of genetically modified varieties of grasses that may be specially "designed" to lower methane emissions, increased digestibility, increased nutritional value or any such purpose.