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The comment was received via email by the VCS Association

Comments on the proposed new VCS methodology "Methodology for Sustainable Grassland Management (SGM)":

Applicability condition *h*)

Regions where precipitation is less or equal to potential evaporation in same period. The indirect N₂O emission from leach and runoff is not considered according to Chapter 11, Volume 4 of 2006 IPCC Guidelines.

--unclear what is meant by "in same period"

"N-fixing grass"

--probably they mean N-fixing vegetation since most N fixing in grasslands is actually done by legumes or other forbs.

Seems like they count all of the N from N fixing species as contributing to emissions. This seems wrong. Even for N-fixing species, only a fraction of the N that they acquire comes from the atmosphere. Since you don't count N₂O emissions associated with the organic N inputs in litter of non-N fixing species, then shouldn't they only count N emissions from the proportion of N that is actually fixed by the N fixers?

"Since the applicability conditions limit the project to lands that are degrading,"

--unclear the criteria with which Pps determine if lands are degrading.

--"stratum" could be added to definitions.

--20 cm depth is not justified. This seems to shallow. I would recommend 30 cm. This depth can usually be sampled with essentially the same level of effort as 20 cm. Alternatively, the depth of 20 cm should be justified.

"Following the CDM AR grazing displacement leakage tool , it is assumed that if grazing animals are sold to an entity not involved in the improved grassland management project activities, or if animals are slaughtered, then there is no leakage due to grazing displacement."

--this does not make any sense to me. If, instead of grazing the animals on your lands, you sell them to someone else to gaze on their lands, then this would seem like a textbook case of leakage. Unclear why you would then assume there is no leakage. This is listed as "assumption 1". This issue could be remedied by removing this assumption. (Side note: I checked the CDM methodology that they refer to. The same problem appears in this methodology, so this is not simply an issue of misinterpreting the CDM methodology.)

I have not thoroughly reviewed the CDM methodology, but it seems OK to reference it for leakage, with the above caveat that selling your livestock to a party not involved in the project should still result in leakage if the livestock will continue to be grazed (i.e. if they are not sold for slaughter).

"The SOC density should be estimated using area-weighted average values of model input parameters for each management practice identified. The proponents should demonstrate that the standard deviation of the modeled SOC within each group is less than 10% of the average value."

--this is an important piece to define what it means to use a "validated" model. Needs to be retained.