

#### FORM

# **FORM - DEVIATION REQUEST SUBMISSION**

**PUBLICATION DATE: 12/11/2024** 

**VERSION: 6.0** 

**NEXT PLANNED UPDATE: 12/11/2026** 

#### **RELATED DOCUMENTS**

- <u>Deviations Approval Requirements and Procedures</u>

#### **CONTACT DETAILS**

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Email help@goldstandard.org

# 1| General Guidelines

#### 1.1 | Applicability

- 1.1.1 | This form is to be completed for projects (project activities/PoAs/VPAs) seeking deviation or is/are at a risk of deviating from any applicable requirements, GS4GG-specific requirements listed in the applicable <a href="Methodologies">Methodologies</a> or any other deviations occurring in any of the various aspects of the project.
- 1.1.2 | Refer to the latest version of <u>Deviation Request Requirements and Procedures</u> for detailed information on the procedures and requirements.
- 1.1.3 | This form can be used in the following instances i.e.,
  - a. Deviation from GS4GG requirements and/or applicable methodologies prior to submission for certification with GS4GG.
  - b. Temporary changes to a certified project which include changes from the registered monitoring plan, the applied methodologies or other standard documents - that are expected **not** to occur beyond a given monitoring period.
- 1.1.4 | For any permanent changes to a design certified project, the requirements set in <a href="Design Change Approval Requirements">Design Change Approval Requirements and Procedures shall be followed.</a>

# 2| Submission of deviation form

- 2.1.1 | This form shall be submitted in Microsoft Word (.doc) format to Gold Standard at <a href="mailto:deviations@goldstandard.org">deviations@goldstandard.org</a>
- 2.1.2 | Forms with incomplete/inaccurate information shall not be considered for review and shall be returned to the applicant.

# 3| Implementation of deviation decision

3.1.1 | The decision prescribed in this form shall be considered by the entity applying for deviation for further course of action.

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# 4| Decision summary

## To be completed by Gold Standard

#### 4.1 | General information

DEVIATION REFERENCE NUMBER		DEVRQ-174		
Date of decision		29/07/2025		
Decision	☑ Approved [No precondition to apply the deviation decision]			
	☐ <b>Conditionally approved</b> [Decision is subject to compliance with the			
	precondition defined below]			
	□ <b>Not approved</b> [reason for rejection is provided in decision summary]			

#### 4.2 | Decision

#### 4.2.1 | **Decision Summary**

The deviation request is approved for the PoA GS11189 for the 2<sup>nd</sup> crediting period. The CME shall ensure compliance with the same requirements as in the approved DEV\_184.

## 4.2.2 | Directions for the project developer/CME, if applicable

The CME shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the CME. The CME shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision. The CME shall document the deviation request, its implications, and GS decision in the appropriate section of the project document.

4.2.3 | Directions for the Validation and Verification Body (VVB), if applicable The VVB shall, through appropriate means at disposal, evaluate that the project's compliance with the above-mentioned conditions and provide VVB opinion in the verification report.

#### 4.2.4 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the CME and the VVB for appropriateness, accuracy and consistency.

## 4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances?¹	□ Yes
	□ No
Does this decision set a precedent for future projects with similar	□ Yes
circumstances? <sup>2</sup>	□ No
Precedent details (if applicable to other activities)	

# **5**| Deviation Request Details

<u>To be completed by the entity requesting deviation - (Project Developer/Coordinating and Managing Entity and/or VVB)</u>

5-:	ι   Submitted by
	Project developer
X	CME
	VVB
	Other (specify)

## 5.2 | Details of the entity and its representative submitting the form

Item	Information
Name <sup>3</sup> :	Evan Haigler
Email ID <sup>4</sup> :	ehaigler@impactcarbon.org
Organisation: <sup>5</sup> :	Impact Carbon LLC
Are you an authorized project participant as	⊠ Yes
per the cover letter submitted for this	□ No
activity?	

## 5.3 | Background information

Туре	☐ Project activity	☑ PoA GSXXXX	⊠ VPA
GS ID		GS11189	GS11259 - GS11288
			GS11289 - GS11305
			GS12251 - GS12275
			GS12390 - GS12420
Host country(ies)	GS11259 - GS11288, GS	12390 – GS12420 - Nig	geria

<sup>&</sup>lt;sup>1</sup> If this is marked yes, this means that any other project (PoA/VPA/PA) in similar situation may apply the decision of this deviation to their project as well. The project developer/VVB may quote this deviation decision in the relevant certification documents. This is relevant to only the projects which have already entered the certification cycle with GS4GG.
<sup>2</sup> If this is marked yes, it means the decision is valid to all the future projects which will enter the certification cycle with the similar situation. This

<sup>&</sup>lt;sup>2</sup> If this is marked yes, it means the decision is valid to all the future projects which will enter the certification cycle with the similar situation. This is relevant to all the projects which are not yet design certified with GS4GG or have not submitted their documents for preliminary review yet.

<sup>&</sup>lt;sup>3</sup> Name of the individual representing the entity requesting the deviation

<sup>&</sup>lt;sup>4</sup> Email ID for further correspondence related to the deviation request

<sup>&</sup>lt;sup>5</sup> The name of the entity requesting the deviation

#### GS11289 - GS11305, GS12251 - GS12275 - Kenya

#### Project Title

PoA: Improved Cookstove and Safe Water Programme VPAs:

Improved Cookstove and Safe Water Programme - Nigeria - VPA 01 Improved Cookstove and Safe Water Programme – Nigeria – VPA 02 Improved Cookstove and Safe Water Programme – Nigeria – VPA 03 Improved Cookstove and Safe Water Programme – Nigeria – VPA 04 Improved Cookstove and Safe Water Programme - Nigeria - VPA 05 Improved Cookstove and Safe Water Programme – Nigeria – VPA 06 Improved Cookstove and Safe Water Programme – Nigeria – VPA 07 Improved Cookstove and Safe Water Programme – Nigeria – VPA 08 Improved Cookstove and Safe Water Programme – Nigeria – VPA 09 Improved Cookstove and Safe Water Programme – Nigeria – VPA 10 Improved Cookstove and Safe Water Programme – Nigeria – VPA 11 Improved Cookstove and Safe Water Programme - Nigeria - VPA 12 Improved Cookstove and Safe Water Programme - Nigeria - VPA 13 Improved Cookstove and Safe Water Programme - Nigeria - VPA 14 Improved Cookstove and Safe Water Programme - Nigeria - VPA 15 Improved Cookstove and Safe Water Programme – Nigeria – VPA 16 Improved Cookstove and Safe Water Programme - Nigeria - VPA 17 Improved Cookstove and Safe Water Programme - Nigeria - VPA 18 Improved Cookstove and Safe Water Programme – Nigeria – VPA 19 Improved Cookstove and Safe Water Programme – Nigeria – VPA 20 Improved Cookstove and Safe Water Programme - Nigeria - VPA 21 Improved Cookstove and Safe Water Programme - Nigeria - VPA 22 Improved Cookstove and Safe Water Programme - Nigeria - VPA 23 Improved Cookstove and Safe Water Programme - Nigeria - VPA 24 Improved Cookstove and Safe Water Programme – Nigeria – VPA 25 Improved Cookstove and Safe Water Programme - Nigeria - VPA 26 Improved Cookstove and Safe Water Programme – Nigeria – VPA 27 Improved Cookstove and Safe Water Programme - Nigeria - VPA 28 Improved Cookstove and Safe Water Programme - Nigeria - VPA 29 Improved Cookstove and Safe Water Programme - Nigeria - VPA 30 Improved Cookstove and Safe Water Programme - Kenya - VPA 31 Improved Cookstove and Safe Water Programme – Kenya – VPA 32 Improved Cookstove and Safe Water Programme – Kenya – VPA 33 Improved Cookstove and Safe Water Programme - Kenya - VPA 34 Improved Cookstove and Safe Water Programme – Kenya – VPA 35 Improved Cookstove and Safe Water Programme - Kenya - VPA 36 Improved Cookstove and Safe Water Programme – Kenya – VPA 37 Improved Cookstove and Safe Water Programme - Kenya - VPA 38 Improved Cookstove and Safe Water Programme - Kenya - VPA 39 Improved Cookstove and Safe Water Programme - Kenya - VPA 40 Improved Cookstove and Safe Water Programme - Kenya - VPA 41 Improved Cookstove and Safe Water Programme – Kenya – VPA 42 Improved Cookstove and Safe Water Programme - Kenya - VPA 43 Improved Cookstove and Safe Water Programme – Kenya – VPA 44 Improved Cookstove and Safe Water Programme – Kenya – VPA 45 Improved Cookstove and Safe Water Programme - Kenya - VPA 46 Improved Cookstove and Safe Water Programme - Kenya - VPA 47 Improved Cookstove and Safe Water Programme - Kenya - VPA 49 Improved Cookstove and Safe Water Programme - Kenya - VPA 50 Improved Cookstove and Safe Water Programme - Kenya - VPA 51 Improved Cookstove and Safe Water Programme - Kenya - VPA 52 Improved Cookstove and Safe Water Programme - Kenya - VPA 53 Improved Cookstove and Safe Water Programme – Kenya - VPA 54 Improved Cookstove and Safe Water Programme – Kenya - VPA 55 Improved Cookstove and Safe Water Programme - Kenya - VPA 56

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	Nigeria – VPA 07 Improved Cookstove and Safe Water Programme –
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GS11269	Improved Cookstove and Safe Water Programme –
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	Nigeria – VPA 14 Improved Cookstove and Safe Water Programme –
GS11273	Nigeria – VPA 15
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Scale	☐ Microscale				
	⊠ Small scale	9			
	□ Large scale	2			
	$\square$ Other, if a	pplical	ble please specify be	elow	
	Insert text he	ere			
Certification Status and corresponding	□ Listed		☑ Certified design	☑ Certified project	☐ Other  If other,  specify here
			<u> </u>	<u>I</u>	Specify Here

date of latest status			VPA	02/2024 s GS12: .2420		for GS11288 26/09/2026 for GS11289	24 for MP <sup>2</sup> 259 - 24 for MP <sup>2</sup> – GS1130 24 for MP:	4 5	dd/mm/yyyy	
Applied version of		166				GS12251	- GS1227	5		
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5-4   Project de	□ Lan □ Oth Insert	name here	rest	s Activit	y Requ	irements	PA(s) that	— —		
was submitted to G	S previo	ously? If yes,	belo	w infor	mation.	1			□ No	
Reference number		DEV_184								
Status of the deviat	tion	⊠ Approved			Reject	ed	□ Unde	er re	view	
Were there any findings (CL, CAR, FAR) raised during any certification step (preliminary review, design and/or performance review etc.) that are relevant to this deviation request?		Summary of the findings GS12390 − GS12420 − MP1 Performance Review Feedback CL3 GS12251 − GS12275 − MP2 Performance Review Feedback CL1  The DEV_184 specifies it is limited to GS11259 − GS11290 for CP1. Thus, another deviation has been asked to be filed for GS 12390 − GS 12420 and GS 12251 − GS 12275 in the latest performance review feedback from GS								

# 6| Deviation detail

To be completed by the entity requesting deviation (Project Developer/Coordinating and Managing Entity and/or VVB)

# 6.1 | Standard document reference

Standard document reference	Title	METHODOLOGY FOR EMISSION REDUCTIONS FROM SAFE DRINKING WATER SUPPLY				
	Version	Version 1.0				
	Paragraph	Parameter Table SDWS 29 and page 51 wrt to SDWS29				
		Para 4.2.2 of the applied methodology				

6.2   Description of	the deviation			
Title	Deviation from ageing based survey for WPS and monitoring under single sampling plan			
Confirm the nature of changes related to deviation	□ Temporary		⊠ Permanent	
	(e.g. not expected to occur beyond one monitoring period)		(e.g. deviation from requirements prior to submission for certification)	
	An identical deviation (DEV_184) already approved for first batch of the VPAs under the PoA (GS 11259- GS 11305) is limited to their first crediting period (CP1). This deviation seeks an extension to the approved deviation to CP2 of the VPAs GS 11259 - GS 11305 (renewal due in 2026) as well as other VPAs that have been subsequently included under the PoA (GS12390 – GS12420 in Nigeria and GS12251 – GS12275 in Kenya ) to allow a unified and consistent sampling and monitoring plan across the VPAs in a given country.			
Relevant monitoring	Start date	01/12	/2023	
period, if applicable	End date			
Summarise the changes	The PoA GS11189 and its VPAs are based on GS4GG approved large scale methodology "Methodology for emission reductions from safe drinking water supply" version 1.0, 03/05/2021.  Specific authorization is requested for the following requirements of the methodology for project surveys:  1. As per applied methodology "Methodology for emission reductions from safe drinking water supply version 1.0, 03/05/2021" parameter table SDWS 29 - The minimum sample size for IWT - for individual technology age group shall be determined considering the project technology type and in line with the sampling approach applied"  2. Also, page 51 of the applied methodology, for parameter			
	SDWS29, refers a minimum sample size of 30 per technology age.			

3. Para 4.2.2. of the applied methodology prohibits grouping more than 10 VPAs together.

The PoA has 104 small sale VPAs that include Water Purification System (WPS) in Nigeria and Kenya. These 104 VPAs include Chlorination WPS (UltraTAB and UltraFLO) devices to provide safe drinking water to project institutions

Unlike ICS technologies that age significantly over time, WPS technologies are not affected by ageing, and are resupplied, maintained, and/or replaced on an ongoing basis. The water purification technologies operate on consumable modules basis i.e., once their treatment capacity (cartridge/tablets/filters) is fully consumed, their consumables (cartridges/tablets/filters) are replaced making them revive their useful lifetime (age) again. For example, Chlorination based UltraFLO cartridge can be replaced once it is consumed and the WPS is replenished with a new cartridge and hence a given system can run for eternity with regular cartridge supplies.

Also, unlike ICS (where ICS efficiency degrades over time and emission reduction is a function of thermal efficiency) WPS operate on binary performance rather than reducing performance i.e., a WPS irrespective of its age will either provide safe water or unsafe water.

Thus, requirement to monitor the systems per technology age is deemed superfluous and only the monitoring of each WPS technology, irrespective of age shall be applicable for WPS devices.

Additionally, all 104 VPAs under the PoA are distributed in Nigeria (61 VPAs) and Kenya (42 VPAs). The VPAs in a given country are identical as they follow same management plan, operational plan and technologies. The limitation to not club more than 10 VPAs, results in increasing the burden of monitoring on CME by multifolds. The VPA number is not a correct parameter to determine the limits for sampling. Please refer below for example:

- a. 10 micro scale VPAs (with each unit resulting in 100 VERs per annum) shall only include 1,000 systems.
- b. 10 small scale VPAs on the other hand, will have 6,000 systems (of the same type as in a) above)
- c. Lastly, 10 large scale VPAs may have even 60,000 or 600,000 systems when combined for sampling.

Thus, limiting the sampling by VPA numbers is discriminating and prohibitive to micro and small scale PoAs.

Given the aforesaid VPAs are identical, hence the CME shall be allowed to conduct the project surveys for WPS stratifying each technology irrespective of their age and by grouping more than 10 small scale VPAs together.

An illustration for Nigeria in MP5 (currently under the performance review) wrt to sample size is given below:

Sample Size - Operational Units			
WPS Type	Total Sales	expected operational	Calculated
(Sampling	(Sampling	rate (%)	Sample
Frame)	Frame Size)		Size (n)
UltraFlo	10,000	90%	30
UltraTab	35,000	90%	78
Sample size determination			
Estimated Operational Units (p) 90%			90%
Estimated Standard Deviation of Operational Units   30.0%			
(SD)			
$V = (SD/p)^2$ 0.11			0.11
Sample Size required (Operational Units) 100			100

Thus, in line with the methodology the following have been considered:

- 1. A confidence level of 95% (for cross VPA sampling) and a precision of 10% (for annual sampling) has been applied.
- 2. A stratified random sampling approach has been applied stratifying on the basis of technology.
- 3. The minimum sample size for the group has been considered as 100.
- 4. For each technology category, the minimum sample size is considered as 30. In the above example, the sample size arrived for UltraFlo was only 23 samples which was considered as 30 instead.
- 5. Total sample size therefore is 108 (=30 + 78).

The aforesaid is in compliance with the latest Standard: Sampling and surveys for CDM project, version 09.0 and "Guidelines for sampling and surveys for CDM project activities and programmes of activities", version 04.0.

#### Reason for deviation

The aforesaid deviation has already been approved for first batch of the VPAs under the PoA (GS 11259- GS 11305), however, limited to their first crediting period (CP1).

This deviation seeks an extension to the approved deviation to CP2 of the VPAs GS 11259 - GS 11305 as well as subsequent VPAs that have been included under the PoA (GS12390 – GS12420 in Nigeria and GS12251 – GS12275 in Kenya) to allow a unified and consistent sampling and monitoring plan across the VPAs in a given country.

Alternatively, without this deviation approval, (considering age, technology and 10 VPA groups), 1,000 – 1,500 samples would need to be monitored for methodology compliance, which is not feasible to implement and rather overly superfluous. It would also be a very poor use of resources, given desired reliability and precision can be achieved with much lower sample sizes i.e. 100 – 150 samples (as illustrated above), preserving program

resources for improving usage, hygiene campaigns, and other critical program activities. Additionally, the CME has demonstrated full compliance with the conditions precedent in the DEV 184 Approved Decision. The same has been verified multiple times and approved under the performance certifications under the PoA till date. Given the aforesaid VPAs are identical, hence the CME shall be Proposed resolution allowed to conduct the project surveys for WPS stratifying each technology irrespective of their age and by grouping more than 10 small scale VPAs together. Further, the deviation is requested to be universally applicable to all the VPAs under the PoA, while ensuring the following: The stratified random sampling approach applied for sample size calculation for the monitoring survey shall meet all the requirements under Appendix 3 of Guideline: Sampling and surveys for CDM project activities and programmes of activities. The CME shall maintain continuity in the project's monitoring activities, and PD can justify that no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). However, if gap(s) exist, the project shall justify that conservative approach(es) have been applied in line with overarching GS principles (as applicable). The aforesaid has already been demonstrated in each of the 4 performance certifications that have been taken under Nigeria and Kenya each, under the PoA. Select the relevant area: Is there any potential temporary or ☐ Project design permanent impact of □ Local stakeholder consultation deviation on other □ Safequarding principles aspects of the project? ☐ SDG assessment ☐ Regulatory compliance □ Additionality ☐ Applicability of methodology ☐ Annual emission reduction volume (if yes, fill the table below) Annual emission Annual emission reduction/ reduction/removal before applying removal after applying deviation deviation XYZ tCO2e XYZ tCO2e ☐ any other matrix, please specify...

Summary of the impact	The proposed deviation does not have any impact on any of the above relevant areas. The Emission reductions before and after applying the deviation shall remain the same
Insert text here	

#### 6.3 | VVB information

	Yes □ No ⊠
required?	An identical deviation has already been
VVB opinion shall be included, where	approved for first batch of the VPAs under
required by the requirements under	the PoA (GS 11259- GS 11305), however,
Deviations Request Requirements and	limited to their first crediting period (CP1) -
Procedures or request is submitted by the	refer DEV_184.
VVB,	

## 6.4 | VVB's assessment

The below information is to be completed by VVB, if applicable.			
VVB's assessment of deviation request		Please confirm the nature of deviation.	
VVB's assessment of impact of deviation request			
VVB recommendation			
VVB details	VVB name:		
	Auditor name	(s):	
	Email (s):		

#### 6.5 | Documents:

- 6.5.1 | List of documents provided (note that once a decision has been made by Gold Standard, this deviation form will be made public on the Gold Standard website. Kindly refrain from including any confidential information in the form.)
  - 1. DEV 184
  - 2. GS11189 VPA 31-47 49-61\_PERR\_RF, Rd3 feedback
  - 3. GS11189 VPA 01-30 & 74-102\_PERR\_RF, Rd3 feedback

#### **DOCUMENT HISTORY**

VERSION NUMBER	RELEASE DATE	DESCRIPTION
6.0	12.11.2024	Editorial and structural changes to the template

5.0	11.04.2022	Additional information added: - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved - Guidance on VVB opinion
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4.0	14.01.2021	Editorial changes
3.0	16.07.2020	Editorial changes
2.0	03.05.2018	Editorial changes
1.0	01.07.2017	Initial adoption