

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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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 Methodologies 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 Design Change Approval Requirements and Procedures shall be followed.

2| Submission of deviation form

- 2.1.1 | This form shall be submitted in Microsoft Word (.doc) format to Gold Standard at deviations@goldstandard.org
- 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_226		
Date of decision		24/09/2025		
Decision	Decision Approved [No precondition to apply the deviation decision]			
☐ Conditionally approved [Decision is subject to compliance with the precondition defined below]				
□ Not approved [reason for rejection is provided in decision summary]				

4.2 | Decision

4.2.1 | **Decision Summary**

The deviation request is approved because the CME previously grouped all VPAs in a single monitoring survey across all seven MPs under CP1, using stratified random sampling based on stove model, vintage, and location (urban/rural) per the CDM methodology AMS II.G. Exemption for the last six months of CP1 (from 01/07/2024 to 14/12/2024) from the requirement limiting cross-sampling to no more than 10 VPAs is granted.

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 and methodological requirements (e.g., the CME must still follow the requirement on age groups from TPDDTEC) 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 circumstances? ²	□ Yes ⊠ No
Precedent details (if applicable to other activities) NA	

 1 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.

² 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.

Deviation Request Details

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

5.1	Sub	mitte	ed by
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□ Project de	veloper
--------------	---------

 \boxtimes CME

□ VVB

□ Other (specify...)

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

Item	Information
Name ³ :	Erik Wurstere
Email ID ⁴ :	erik@bioliteenergy.com
Organisation: ⁵ :	Biolite
Are you an authorized project	⊠ Yes
participant as per the cover letter submitted for this activity?	□ No

5.3 | Background information

Туре	☐ Project activity	⊠ PoA GSXXXX	⊠ VPA
GS ID	GSXXXX GSXXXX	GS11191	GS11193, GS11194, GS11196, GS11197, GS11198, GS11199, GS11200, GS11879, GS11880, GS11881, GS11882, GS11883, GS11884, GS11885, GS11886, GS11887, GS11888, GS11889 and GS11890
Host country(ies)	Kenya		
Project Title	PoA: BioLite Improved Co VPAs: GS11193: CPA 008 - Cha GS11194: CPA 009 - Cha GS11196: CPA 051 - Cha GS11197: CPA 052 - Cha GS11198: CPA 053 - Cha	arcoal Stoves in Kenya arcoal Stoves in Kenya arcoal Stoves in Kenya arcoal Stoves in Kenya	

 $^{^{\}rm 3}$ Name of the individual representing the entity requesting the deviation $^{\rm 4}$ Email ID for further correspondence related to the deviation request

⁵ The name of the entity requesting the deviation

Applicable activity requirement	☐ Renewable Energed ☐ Community Served ☐ Land-use and Fo	vice	s Activity	Name here equire	e of the St ements irements	andard -	Inse	rt text	
,			,	Name here equire	of the St	andard –	Inse	rt text	
				Name		andard –	Inse	rt text	
	N						□ Other Name of the Standard – Insert text here		
	Name of another s	tand	dard	⊠ CDM					
applicable	From another standard to GS40			GG 17/08/2022					
Transition date, if	From previous GS	vers	ion to G	S4GG		dd/mm,	/уууу	1	
	Gold Standard				□ 1.1	□ 1.2		□ 2.2	
Applied version of Standard	□ GS4GG □ Previous version	of	Version	no					
Amaliad	dd/mm/yyyy	03/	03/2022		25/06/20)25	dd/i	mm/yyyy	
Certification Status and corresponding date of latest status		design		□ Certified project			☐ Other If other, specify here		
Scale	 □ Microscale (GS) ☑ Small scale □ Large scale □ Other, if applicable please specify below Insert text here 								
Registry link	https://registry.go	iust	anuaru.u	rg/pro	jects/deta	1115/31/9			
	GS11879: CPA 056 GS11880: CPA 058 GS11881: CPA 058 GS11882: CPA 059 GS11883: CPA 060 GS11884: CPA 061 GS11885: CPA 063 GS11886: CPA 063 GS11887: CPA 064 GS11888: CPA 065 GS11889: CPA 066	7 - (7 - (8 - (8 - (8 - (8 - (8 - (8 - (Charcoal	Stoves Stove Stove Stove Stove Stove Stove Stove Stove Stove	s in Kenya s in Kenya				

Reference number	DEV_367			
Status of the deviation	⊠ Approved		□ Rejected	☐ Under review
Were there any findings (C	L, CAR, FAR)	⊠ Yes	□ No	
raised during any certificat (preliminary review, design performance review etc.) the relevant to this deviation research.	Summary of the findings As per deviation Dev_367 dated 24/02/2023, regarding the extension of crediting period for GS11193, and GS11194, emission reductions (ERs) can be claimed for end date of the first crediting period and submission of design certification renewal request (in 2024) under the previously registered methodology. However, post-renewal:			
		• If e a si	f emission reductions a stimated, they shall djusted in the first mo econd crediting period f emission reductions a nderestimated, no adju	are found to be over- l be retrospectively onitoring period of the of the VPA. re found to be ustment will be made.
		impleme claimed calculate	E shall ensure that the stand of the VVB emission reductions of the control of the control of the first monitoring properties.	shall verify that the are conservatively retroactively adjusted

6| Deviation detail

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

6.1 | Standard document reference

Standard document	Title	Technologies and Practices to Displace Decentralized Thermal Energy Consumption (TPDDTEC)
reference	Version	4.0
	Paragraph	4.4.3

6.2 | Description of the deviation

Title	Retroactive application of CP2 revised monitoring plan to CP1 last MP.			
Confirm the nature of			□ Permanent	
changes related to	(e.g. not expected to occu	ır	(e.g. deviation from requirements	
deviation	beyond one monitoring pe	eriod)	prior to submission for certification)	
	Insert Text here (if required) to support the selection			
Relevant monitoring	Start date	01/07/2024		
period, if applicable	End date	14/12/2024		
Summarise the changes	The proposed temporary change (for last 6 months monitoring period under CP1) pertains to exemption from para 4.4.3 of the applied methodology.			
Reason for deviation	The concerned VPAs in CP1 are based on AMS II.G. v3.0 and have already issued credits till 30 th June 2024. In CP2, these VPAs were			

restructured to use TPDDTEC v4.0 as well were consolidated into large scale VPAs.

As per Clarification Request CLRQ-178 decision, CME is allowed to apply TPDDTEC v4.0 methodology upto two years prior to the renewed crediting period, provided relevant monitoring requirements (as per TPDDTEC v4.0) are duly met.

Thus, under CP1, the last monitoring period (MP8 - 1st July 2024 to 14th Dec 2024), which remains to be verified and certified, is deemed eligible to use TPDDTEC v4.0.

To comply with the CP2 registered monitoring plan under TPDDTEC v4.0, the CME is currently conducting project KPTs to determine $P_{p,y}$ while $P_{b,y}$ has been fixed ex-ante in the CP2 VPA-DDs. Further, the CME has already conducted project usage surveys for CP1 MP8 (as per CP1 registered monitoring plan), to be largely in compliance with the CP2 registered monitoring plan as well, with exception to para 4.4.3 of the TPDDTEC v4.0.

Para 4.4.3 prohibits cross VPA sampling for groups larger than 10 VPAs.

Proposed resolution

The VPAs under CP1 have been monitored, verified and issued multiple times in the past, using stratified random sampling, based on stove model, vintage and location (urban / rural). The stratification applied in last performance certified MR (link) is as follows:

Stove Model (Sampling Frame)						
Location Type	ICS Model	Fuel type	Vintage			
Urban	JB, MY	charcoal	2018			
Rural	JB, MY	charcoal	2018			
Urban	JB, MY	charcoal	2019			
Rural	JB, MY	charcoal	2019			
Urban	MY	charcoal	2020			
Rural	MY	charcoal	2020			
Urban	JM	charcoal	2020			
Rural	JM	charcoal	2020			
Urban	MY	charcoal	2021			
Rural	MY	charcoal	2021			
Urban	JM	charcoal	2021			
Rural	JM	charcoal	2021			
Urban	MY	charcoal	2022			
Rural	MY	charcoal	2022			
Urban	JM	charcoal	2022			
Rural	JM	charcoal	2022			
Urban	MY	charcoal	2023			
Rural	MY	charcoal	2023			
Urban	JM	charcoal	2023			
Rural	JM	charcoal	2023			

Urban	JM	charcoal	2024
Rural	JM	charcoal	2024
Urban	JS	charcoal	2024
Rural	JS	charcoal	2024
Urban	MY	charcoal	2024
Rural	MY	charcoal	2024

A similar stratification approach was applied for CP1 MP8 usage surveys (conducted in Aug 24 – Feb 25), combining all VPAs' ICS population together, in line with CP1 monitoring plan, besides representing / covering ICS samples from all vintages, as mentioned in the table above. This approach, although contradicts para 4.4.3 of the TPDDTEC, does not impact the statistical robustness of sampling results and accuracy of emission reduction calculations. As per TPDDTEC, a 90/10 confidence / precision is applicable on usage surveys, while the CME conducted the usage surveys under CP1 MP8 following 95/10 confidence / precision levels in line with CP1 registered monitoring plan under AMS II.G. following CDM Standard for Sampling and Surveys, v 9.0.

Is there any potential temporary or permanent impact of deviation on other aspects of the project?

Select the relevant area:

- ☐ Project design
- ☐ Local stakeholder consultation
- □ Safeguarding principles
- ☐ 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

Describe the impact of the deviation on each relevant aspect of the project as selected above. Please substantiate the impact assessment with relevant and verifiable data/information.

The deviation proposed is wrt to sampling approach and sample size determination for usage surveys. The stratified approach applied for sampling shall be representative of the project population with increased level of confidence / precision, thus increasing reliability of the statistical results established.

6.3 | VVB information

Is a VVB opinion on the deviation request	Yes □ No ⊠
required?	If answer is yes, fill the information in section
VVB opinion shall be included, where	6.4 below.
required by the requirements under	
Deviations Request Requirements and	

Procedures or request is submitted by the	
VVB.	

6.4 | VVB's assessment

The below information is to be completed by VVB, if applicable.		
VVB's assessment of		Please confirm the nature of deviation.
deviation request		
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.)

S.No.	Document Name	Access
1	Clarification request CLRQ-178 and Gold Standard response dated 16/07/2025	<u>Link</u>
2	GS11191 CP2 PoA DD Ver2.0 18112024	
3	GS11191 PoA GS11193 Real Case VPA1 Ver2.0 18112024	
4	GS11191 PoA GS11200 Regular VPA1 Ver2.0 18112024	
5	GS11191 PoA GS11890 Regular VPA2 Ver2.0 18112024	
6	GS PoA 11191 MP7 MR ver 5.0 03072025_ Clean	

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
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