

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 13/01/2025

1.2 | Decision

The deviation request is approved only for the period 21/03/2022 to 20/03/2024 of the first crediting period, under the following conditions:

1. For Usage surveys

- The verifying VVB shall ensure that the usage survey questionnaires were designed to cover the period from 21/03/2022-20/03/2024 following the [Cookstove Usage Rate Guidelines](#).
- The project developer shall confirm and the VVB shall verify that this is a temporary deviation, and the project developer has measures/procedures in place to secure that this will not be recurrent.
- The VVB shall validate the reasons for this temporary deviation on the annual monitoring of the usage surveys.
- The VVB shall ensure that the project developer has demonstrated, in its monitoring reports, that GHG emission reductions are not overcalculated (as the rejection rate

of Hifadhi stoves in 2022-23 monitoring period was as high as 62%) because of the deviation and that the applied conservative approach mentioned in the deviation request are correct and provide conservative final emission reductions.

- The VVB shall ensure that the monitoring report is documenting this deviation request's conclusion, its implications, and the GS decision.
- The VVB shall include, in its verification report, the means of evaluation of project's compliance with the above conditions and provides its opinion in the Verification Report.

2. For project KPT

- The VVB shall ensure that the KPT tests conducted and recorded in the table including the date of performing these KPTs are in line with the methodology's requirements.

3. Annual Report

- The VVB shall ensure that the Project Developer implements a process/procedure to ensure that in future, the Annual Reports are submitted each year and latest by end of the following year of a monitoring period as stipulated in the applicable version of Principles & Requirements.

1.3 | Is this decision applicable to other project activities under similar circumstances?

No

B. To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation (Submit deviation request form in Microsoft Word format)

2 | Background information

The Enkima Cookstove Project (GS11319) was first implemented within Narok County in March 2022. Following on from the great success of another cookstove Kenyan project, it was assumed that the same cookstove model (the Hifadhi) would be suitable for rural households in Narok county.

In MP1, 21/03/2022 – 20/03/2023, 10,735 Hifadhi cookstoves were distributed. After an estimated 9 months of distribution, preliminary sample usage surveys were conducted, which found a low uptake rate of the stove. Whilst the households were

happy to have received a stove, they were not communicative that the stove was not entirely suitable for their domestic cooking needs. Whilst the team were busy with ongoing distribution to ensure smooth roll-out, follow-up phone calls were neglected. Initial training with stove demonstrations were conducted on initial distribution, but follow-up trainings were due in MP2, until the stoves were deemed unsuitable.

In light of discovering the unsuitability of the Hifadhi stoves, the monitoring activities (usage survey and pKPT) were postponed whilst a redesign was considered, thinking about a different stove model which could be distributed. This took time, and during this period, no usage survey or KPT surveys were conducted during MP1 or the beginning of MP2. The Hifadhi project database was still collected, all beneficiary agreements for each stove distributed were scanned and the project database was compiled.

Upon the confirmation that a second cookstove could be sourced, supplied and distributed within the project area, the distribution of this second stove model (Sunken stove) began in MP2 and remains ongoing into MP3. As such, the monitoring activities were scheduled to take place after focused training with the implementing partner.

For the context of this project:

Stove model 1 = Hifadhi stove, 10,735 stoves distributed in MP1. No more were distributed after this.

Stove model 2 = Sunken Stove, 6917 stoves distributed in MP2. There will be a total of 15,300 Sunken stoves distributed, completing Dec 2024.

Both stoves were successfully design certified and are present in the PDD and ex-antes.

PP has decided the Hifadhi stove will only credit for MP1 and 2, then the project will generate credits only from the Sunken stoves.

The sustainability and impact of our projects is our core framework, it was underestimated that following on from the success of another project in our portfolio in Kenya, that the Hifadhi stove would possibly not be an appropriate stove to roll out in a different area. We are committed to delivering positive impact and that the

Sunken stove has been adopted much better within the households who have received one.

Deviation Reference Number	DEVQR-38	
Date of decision	13/01/2025	
Precedent (YES/NO)	No	
Precedent details	-	
Date of submission	08/11/2024	
Project/PoA/VPA	Project	ID - GS11319
	<input type="checkbox"/> PoA	ID - GSXXXX
	<input checked="" type="checkbox"/> VPA	ID - GS11319
Project/PoA/VPA title	Enkima Stoves	
Date of listing	08/04/2022	
GS Standard version applicable	TPDDTEC v4.0	
Date of transition to GS4GG (if applicable)	N/A	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	04/05/2023	
Location of project/PoA/VPA	Host country(ies) Republic of Kenya, Narok County	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/3340	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Delayed monitoring activities and annual reports	

<p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p>	<p>TPDDTEC v4.0 ICS parameters:</p> <p>Section 4.2</p> <p><i>ICS 19 – Pp,y (and ICS 20 – SFSb,p,y): conducted in MP1 and updated every two years (pg 37+38)</i></p> <p>The pKPT survey for MP1 Hifadhi stove was not conducted until MP2.</p> <p>The pKPT survey for MP2 Sunken stove was conducted in May 2024, falling just outside of the monitoring period dates for MP2.</p> <p><i>ISC 26 - Up,y, conducted at least annually (pg 41)</i></p> <p>The usage survey for MP1 Hifadhi stove was not conducted until MP2.</p> <p>Principles and Requirements v1.2</p> <p>(d) Annual Reporting (page 26)</p> <p>Annual reports were not submitted for 2022 (MP1) or 2023 (MP2). They have been produced now and submitted to SC.</p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>MP1 : Start date 21/03/2022 End date 20/03/2023</p> <p>MP2 : Start date 21/03/2023 End date 20/03/2024</p>
<p>Submitted by</p>	<p>Contact person name: Amie Nevin</p> <p>Email ID: amie.nevin@se.com</p> <p>Organisation: EcoAct SAS</p>

	Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes; VVB name: TBC We are engaging with VVBs now to select one to begin the VVB verification. VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

3 | Deviation detail

3.1 | Description of the deviation:

**Guidance* Use the space below to describe the deviation and substantiate the reason for requesting deviation from applicable rules/requirements. Please include all relevant information in support of the request. You are requested to follow the principles for requesting deviations, given in the [Deviation Approval Procedure/Design Change Requirements](#).*

3.1.1 | Deviation detail (to be completed by Project developer):

This deviation request is to transparently report the delayed MP1 usage and pKPT surveys for the first stove which was distributed during MP1.

No usage survey or pKPT was conducted in MP1 of the project (21/03/2022 – 20/03/2023).

In MP1, 21/03/2022 – 20/03/2023, 10,735 Hifadhi cookstoves were distributed. After an estimated 9 months of distribution, preliminary sample usage surveys were conducted, which found a low uptake rate of the stove. Whilst the households were happy to have received a stove, they were not communicative that the stove was not entirely suitable for their domestic cooking needs. The team were busy with ongoing distribution to ensure smooth roll-out, which inhibited follow-up measures to ensure the stoves were appropriate and being used we expected.

In light of discovering the unsuitability of the Hifadhi stoves, the monitoring activities (usage survey and pKPT) were postponed whilst a redesign was considered, thinking about a different stove model which could be distributed. This took time, and during this period, no usage survey or KPT surveys were conducted during MP1 or the beginning on MP2. The Hifadhi project database was still collected, all beneficiary agreements for each stove distributed were scanned and the project database was compiled.

An overview of the monitoring activities are as follows:

Monitoring activities undertaken in MP1:

Hifadhi Stove Beneficiary Database/Stove List – Sdistributed/sold and ER,y

Monitoring activities undertaken in MP2:

Hifadhi stove MP1 usage survey – Up,y; IAPp,y; IAPr,y; Tp,y; TR,y.

Hifadhi stove MP1 pKPT – Pp,y

Hifadhi stove MP2 usage survey – Up,y; IAPp,y; IAPr,y; Tp,y; TR,y.

The Hifadhi database was monitored and deemed to be accurate. Sdistributed/sold and ER,y

Sunken stove MP2 usage survey – Up,y; IAPp,y; IAPr,y; Tp,y; TR,y.

The Beneficiary List (project database) and beneficiary agreements for all Sunken stoves distributed within this MP were collected. – Sdistributed/sold and ER,y

The Sunken stove MP2 pKPT – (Pp,y) was conducted after MP2 dates, May 2024.

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

**Guidance* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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3.2 | Assessment of the deviation:

****Guidance*** Use the space below to describe how the deviation complies with the requirements, and, where applicable, the accuracy, completeness and conservativeness is ensured. Please include all relevant information in support of the request.*

3.2.1 | Deviation assessment (to be completed by Project developer):

The deviation of these activities was not pre-planned and it was only in the event of the low uptake of the Hifadhi stove that it was deemed necessary at the time to ensure the project intervention leads to sustainable impacts on the communities. PP understands the need to conduct the usage survey and KPT to the highest standard, with formal training of the field team – which there was not time for in the urgent steps taken to find a more suitable stove model and go through due diligence of assessing manufacturers who were capable to support the initial delivery and then replacement stoves for the projects lifetime.

Given the low usage rates calculated for both Hifadhi usage surveys (MP1 <40%, MP2 <30%), and the high pKPT value calculated for the Hifadhi KPT (>8kg/day), PP does not feel there is any risk of over crediting or concern over the quality /reliance of the data collected. Although collected late, the results reflect the real situation on the ground and ensure carbon credits are only being generated for days the stoves were actually in use.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

****Guidance*** If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

3.3 | Impact of the deviation:

**Guidance* Use the space below to describe the impact of the deviation on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. Please substantiate the impact assessment with relevant and verifiable data/information.*

3.3.1 | Impact assessment (to be completed by Project developer):

We do not consider that the delay in conducting these activities has sacrificed the integrity of the carbon calculations, or the information collected.

If anything, PP have sacrificed themselves additional credits that could have generated with a slightly higher usage rate if the surveys had been conducted during MP1. The final usage rates for the MP1 and MP2 data are both <40%. If the surveys had been conducted month 6-12 of MP1, we could likely have found that the stoves were being used more.

We also found that the pKPT value for the Hifadhi stoves was higher than expected, 8.97 kg/day, indicating again unsuitability. This value also provides suggestive confirmation that the stoves aren't being used properly/to the most efficient way because they're used so little, and the communities are overloading the stoves. Again, this could have been a lower value if the pKPT had been conducted in MP1, when the stove use could have been slightly higher.

We consider these less-than-favourable final values to reflect the real uptake of the Hifadhi stoves and allow us to generate a small volume of carbon credits from the small use they have had.

The Hifadhi stoves list were properly collected and devised, as well as all beneficiary agreements to ensure all of the required information for the stoves was collated accordingly.

The Hifadhi stoves are only going to be verified under the project for MP1 and MP2, given the low use of the technology, they are deemed an unsustainable intervention and not providing long-term sustainable impacts on the communities.

3.3.2 | VVB opinion (to be completed by VVB, if applicable):

**Guidance* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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3.4 | Documents:

**Guidance* List of documents provided (note that once a decision has been made by Gold Standard, this deviation form along with supporting documents will be made public on the Gold Standard website. If any of the supporting documents are confidential, please indicate here to ensure they are omitted.)*

Version number	Release date	Description
1		Annual Report MP1
1		Annual Report MP2
1		Hifadhi MP1 Usage Survey -confidential, contains beneficiary information
1		Hifadhi MP2 Usage Survey -confidential, contains beneficiary information
1		Hifadhi MP1 pKPT -confidential, contains beneficiary information
1		Sunken MP2 Usage Survey -confidential, contains beneficiary information
1		Sunken MP2 pKPT -confidential, contains beneficiary information