FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: **20/05/2026**
VERSION: **6.1**
NEXT PLANNED UPDATE: **15/05/2028**

RELATED DOCUMENTS
– Deviations Approval Requirements and Procedures

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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 Deviation Request Requirements and Procedures 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 help@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 Secretariat

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-495
Date of decision	16/10/2026
Decision	☒ **Approved (Part 1)** [No precondition to apply the deviation decision] ☐ **Conditionally approved** [Decision is subject to compliance with the precondition defined below] ☒ **Not approved (Part 2)** [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

Part 1: Regarding age/cohort-based sampling

The deviation request is conditionally approved for the PoA GS11189 when transitioning to the PAA methodology "Emission Reductions from Safe Drinking Water Supply", V 2.0. In particular, the deviation is given for:

Exemption from age/cohort-based sampling stratification is granted for Water Purification System (WPS) technologies, based on the non-degrading, binary operational nature of WPS units restored via regular consumable replacement. Sampling shall be stratified by WPS technology type across operational units. The deviation is approved with the conditions:

- The simple random/stratified sampling approach applied for sample size calculations for monitoring surveys meets all statistical reliability requirements (minimum 95% confidence and 10% precision for annual sampling).
- The minimum sample size per WPS technology category shall be 50 operational units (or higher if calculated per sampling standards).
- Continuity in project monitoring activities is maintained, and the CME justifies that no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). If gaps exist, conservative approaches must be applied in line with overarching Gold Standard principles.
- CME shall maintain compliance with the Forward Action Request (FAR) established under DEV_184 regarding continuous supply and verification of chlorine tablets (UltraTAB) to avoid overestimation bias.

Part 2: Regarding grouping of more than 10 VPAs for monitoring purpose

- Exemption from the 10 VPA grouping limit for cross-VPA monitoring sampling is not granted. The Project Developer shall not combine more than 10 VPAs for monitoring purposes.

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 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.

5| Deviation Request Details

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

5.1 | Submitted by

☐ Project developer
☒ CME
☐ VVB
☐ Other (specify…)

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

Item	Information
Name[3] :	Evan Haigler
Email ID[4] :	ehaigler@impactcarbon.org
Organisation:[5]:	Impact Carbon LLC
Are you an authorized project participant as per the cover letter submitted for this activity?	☒ Yes ☐ No

5.3 | Background information

Type	☐ Project activity	☒ PoA GSXXXX	☒ VPA
GS ID	*GSXXXX* *GSXXXX*	GS 11189	GS11259 - GS11288 GS11289 – GS11305 GS12251 – GS12275 GS12390 – GS12420
Host country(ies)	GS11259 – GS11288, GS12390 – GS12420 - Nigeria 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 – VPA02 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		

[3] Name of the individual representing the entity requesting the deviation
[4] Email ID for further correspondence related to the deviation request
[5] The name of the entity requesting the deviation

	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 – Nigeria – 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 Improved Cookstove and Safe Water Programme – Kenya - VPA 57 Improved Cookstove and Safe Water Programme – Kenya - VPA 58 Improved Cookstove and Safe Water Programme – Kenya - VPA 59

	Improved Cookstove and Safe Water Programme – Kenya - VPA 60 Improved Cookstove and Safe Water Programme – Kenya - VPA 61 Improved Cookstove and Safe Water Programme – Kenya - VPA 62 Improved Cookstove and Safe Water Programme – Kenya - VPA 63 Improved Cookstove and Safe Water Programme – Kenya - VPA 64 Improved Cookstove and Safe Water Programme – Kenya - VPA 65 Improved Cookstove and Safe Water Programme – Kenya - VPA 66 Improved Cookstove and Safe Water Programme – Kenya - VPA 67 Improved Cookstove and Safe Water Programme – Kenya - VPA 68 Improved Cookstove and Safe Water Programme – Kenya - VPA 69 Improved Cookstove and Safe Water Programme – Kenya - VPA 70 Improved Cookstove and Safe Water Programme – Kenya - VPA 71 Improved Cookstove and Safe Water Programme – Kenya - VPA 72 Improved Cookstove and Safe Water Programme – Kenya - VPA 73 Improved Cookstove and Safe Water Programme – Nigeria - VPA 74 Improved Cookstove and Safe Water Programme – Nigeria - VPA 75 Improved Cookstove and Safe Water Programme – Nigeria - VPA 76 Improved Cookstove and Safe Water Programme – Nigeria - VPA 77 Improved Cookstove and Safe Water Programme – Nigeria - VPA 78 Improved Cookstove and Safe Water Programme – Nigeria - VPA 79 Improved Cookstove and Safe Water Programme – Nigeria - VPA 80 Improved Cookstove and Safe Water Programme – Nigeria - VPA 81 Improved Cookstove and Safe Water Programme – Nigeria - VPA 82 Improved Cookstove and Safe Water Programme – Nigeria - VPA 83 Improved Cookstove and Safe Water Programme – Nigeria - VPA 84 Improved Cookstove and Safe Water Programme – Nigeria - VPA 85 Improved Cookstove and Safe Water Programme – Nigeria - VPA 86 Improved Cookstove and Safe Water Programme – Nigeria - VPA 87 Improved Cookstove and Safe Water Programme – Nigeria - VPA 88 Improved Cookstove and Safe Water Programme – Nigeria - VPA 89 Improved Cookstove and Safe Water Programme – Nigeria - VPA 90 Improved Cookstove and Safe Water Programme – Nigeria - VPA 91 Improved Cookstove and Safe Water Programme – Nigeria - VPA 92 Improved Cookstove and Safe Water Programme – Nigeria - VPA 93 Improved Cookstove and Safe Water Programme – Nigeria - VPA 94 Improved Cookstove and Safe Water Programme – Nigeria - VPA 95 Improved Cookstove and Safe Water Programme – Nigeria - VPA 96 Improved Cookstove and Safe Water Programme – Nigeria - VPA 97 Improved Cookstove and Safe Water Programme – Nigeria - VPA 98 Improved Cookstove and Safe Water Programme – Nigeria - VPA 99 Improved Cookstove and Safe Water Programme – Nigeria - VPA 100 Improved Cookstove and Safe Water Programme – Nigeria - VPA 101 Improved Cookstove and Safe Water Programme – Nigeria - VPA 102 Improved Cookstove and Safe Water Programme – Nigeria - VPA 103 Improved Cookstove and Safe Water Programme – Nigeria - VPA 104
Registry link	**GS ID** / **Registry Link** GS11189 / Improved Cookstove and Safe Water Programme

	GS11259	Improved Cookstove and Safe Water Programme – Nigeria – VPA 01
	GS11260	Improved Cookstove and Safe Water Programme – Nigeria – VPA 02
	GS11261	Improved Cookstove and Safe Water Programme – Nigeria – VPA 03
	GS11262	Improved Cookstove and Safe Water Programme – Nigeria – VPA 04
	GS11263	Improved Cookstove and Safe Water Programme – Nigeria – VPA 05
	GS11264	Improved Cookstove and Safe Water Programme – Nigeria – VPA 06
	GS11265	Improved Cookstove and Safe Water Programme – Nigeria – VPA 07
	GS11266	Improved Cookstove and Safe Water Programme – Nigeria – VPA 08
	GS11267	Improved Cookstove and Safe Water Programme – Nigeria – VPA 09
	GS11268	Improved Cookstove and Safe Water Programme – Nigeria – VPA 10
	GS11269	Improved Cookstove and Safe Water Programme – Nigeria – VPA 11
	GS11270	Improved Cookstove and Safe Water Programme – Nigeria – VPA 12
	GS11271	Improved Cookstove and Safe Water Programme – Nigeria – VPA 13
	GS11272	Improved Cookstove and Safe Water Programme – Nigeria – VPA 14
	GS11273	Improved Cookstove and Safe Water Programme – Nigeria – VPA 15
	GS11274	Improved Cookstove and Safe Water Programme – Nigeria – VPA 16
	GS11275	Improved Cookstove and Safe Water Programme – Nigeria – VPA 17
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	GS11277	Improved Cookstove and Safe Water Programme – Nigeria – VPA 19
	GS11278	Improved Cookstove and Safe Water Programme – Nigeria – VPA 20
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	GS11280	Improved Cookstove and Safe Water Programme – Nigeria – VPA 22
	GS11281	Improved Cookstove and Safe Water Programme – Nigeria – VPA 23
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	GS11283	Improved Cookstove and Safe Water Programme – Nigeria – VPA 25
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	GS11285	Improved Cookstove and Safe Water Programme – Nigeria – VPA 27
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	GS11288	Improved Cookstove and Safe Water Programme – Nigeria – VPA 30
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	GS11295	Improved Cookstove and Safe Water Programme – Kenya – VPA 37
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	GS11297	Improved Cookstove and Safe Water Programme – Kenya – VPA 39
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	GS11299	Improved Cookstove and Safe Water Programme – Kenya – VPA 41
	GS11300	Improved Cookstove and Safe Water Programme – Kenya – VPA 42
	GS11301	Improved Cookstove and Safe Water Programme – Kenya – VPA 43
	GS11302	Improved Cookstove and Safe Water Programme – Kenya – VPA 44
	GS11303	Improved Cookstove and Safe Water Programme – Kenya – VPA 45
	GS11304	Improved Cookstove and Safe Water Programme – Kenya – VPA 46
	GS11305	Improved Cookstove and Safe Water Programme – Kenya – VPA 47
	GS12251	Improved Cookstove and Safe Water Programme – Kenya - VPA 49
	GS12252	Improved Cookstove and Safe Water Programme – Kenya - VPA 50
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	GS12254	Improved Cookstove and Safe Water Programme – Kenya - VPA 52
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	GS12256	Improved Cookstove and Safe Water Programme – Kenya - VPA 54
	GS12257	Improved Cookstove and Safe Water Programme – Kenya - VPA 55
	GS12258	Improved Cookstove and Safe Water Programme – Kenya - VPA 56
	GS12259	Improved Cookstove and Safe Water Programme – Kenya - VPA 57
	GS12260	Improved Cookstove and Safe Water Programme – Kenya - VPA 58
	GS12261	Improved Cookstove and Safe Water Programme – Kenya - VPA 59
	GS12262	Improved Cookstove and Safe Water Programme – Kenya - VPA 60
	GS12263	Improved Cookstove and Safe Water Programme – Kenya - VPA 61
	GS12264	Improved Cookstove and Safe Water Programme – Kenya - VPA 62
	GS12265	Improved Cookstove and Safe Water Programme – Kenya - VPA 63
	GS12266	Improved Cookstove and Safe Water Programme – Kenya - VPA 64
	GS12267	Improved Cookstove and Safe Water Programme – Kenya - VPA 65
	GS12268	Improved Cookstove and Safe Water Programme – Kenya - VPA 66
	GS12269	Improved Cookstove and Safe Water Programme – Kenya - VPA 67
	GS12270	Improved Cookstove and Safe Water Programme – Kenya - VPA 68
	GS12271	Improved Cookstove and Safe Water Programme – Kenya - VPA 69
	GS12272	Improved Cookstove and Safe Water Programme – Kenya - VPA 70
	GS12273	Improved Cookstove and Safe Water Programme – Kenya - VPA 71
	GS12274	Improved Cookstove and Safe Water Programme – Kenya - VPA 72
	GS12275	Improved Cookstove and Safe Water Programme – Kenya - VPA 73
	GS12390	Improved Cookstove and Safe Water Programme – Nigeria - VPA 74
	GS12391	Improved Cookstove and Safe Water Programme – Nigeria - VPA 75
	GS12392	Improved Cookstove and Safe Water Programme – Nigeria - VPA 76
	GS12393	Improved Cookstove and Safe Water Programme – Nigeria - VPA 77
	GS12394	Improved Cookstove and Safe Water Programme – Nigeria - VPA 78
	GS12395	Improved Cookstove and Safe Water Programme – Nigeria - VPA 79

	GS12396	Improved Cookstove and Safe Water Programme – Nigeria - VPA 80
	GS12397	Improved Cookstove and Safe Water Programme – Nigeria - VPA 81
	GS12398	Improved Cookstove and Safe Water Programme – Nigeria - VPA 82
	GS12399	Improved Cookstove and Safe Water Programme – Nigeria - VPA 83
	GS12400	Improved Cookstove and Safe Water Programme – Nigeria - VPA 84
	GS12401	Improved Cookstove and Safe Water Programme – Nigeria - VPA 85
	GS12402	Improved Cookstove and Safe Water Programme – Nigeria - VPA 86
	GS12403	Improved Cookstove and Safe Water Programme – Nigeria - VPA 87
	GS12404	Improved Cookstove and Safe Water Programme – Nigeria - VPA 88
	GS12405	Improved Cookstove and Safe Water Programme – Nigeria - VPA 89
	GS12406	Improved Cookstove and Safe Water Programme – Nigeria - VPA 90
	GS12407	Improved Cookstove and Safe Water Programme – Nigeria - VPA 91
	GS12408	Improved Cookstove and Safe Water Programme – Nigeria - VPA 92
	GS12409	Improved Cookstove and Safe Water Programme – Nigeria - VPA 93
	GS12410	Improved Cookstove and Safe Water Programme – Nigeria - VPA 94
	GS12411	Improved Cookstove and Safe Water Programme – Nigeria - VPA 95
	GS12412	Improved Cookstove and Safe Water Programme – Nigeria - VPA 96
	GS12413	Improved Cookstove and Safe Water Programme – Nigeria - VPA 97
	GS12414	Improved Cookstove and Safe Water Programme – Nigeria - VPA 98
	GS12415	Improved Cookstove and Safe Water Programme – Nigeria - VPA 99
	GS12416	Improved Cookstove and Safe Water Programme – Nigeria - VPA 100
	GS12417	Improved Cookstove and Safe Water Programme – Nigeria - VPA 101
	GS12418	Improved Cookstove and Safe Water Programme – Nigeria - VPA 102
	GS12419	Improved Cookstove and Safe Water Programme – Nigeria - VPA 103
	GS12420	Improved Cookstove and Safe Water Programme – Nigeria - VPA 104

Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below			
Certification Status and corresponding date of latest status	☐ Listed	☒ Certified design[6]	☒ Certified project[7]	☐ Other *If other, specify here*
	dd/mm/yyyy	• GS11259 to GS11288 and GS11289 to GS11305 - *02/02/2022* • GS12251 to GS12275 – *29/12/2023* • GS12390 to GS12420 - *01/02/2024*	• GS11259 to GS11288 and GS11289 to GS11305 - *07/11/2022* • GS12251 to GS12263 – *26/09/2024* • GS12390 to GS12418 - *13/08/2025*	*dd/mm/yyyy*

Applied version of Standard	☒ GS4GG			
	☐ Previous version of Gold Standard	Version no.		
		☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2

Transition date, if applicable	From previous GS version to GS4GG	*dd/mm/yyyy*
	From another standard to GS4GG	*dd/mm/yyyy*
	Name of another standard	☐ CDM ☐ Other Name of the Standard – Insert text here

Applicable activity requirement	☐ Renewable Energy Activity Requirements ☒ Community Services Activity Requirements ☐ Land-use and Forests Activity Requirements ☐ Agriculture Activity Requirements ☐ Blue Carbon and Freshwater Wetlands Activity Requirements ☐ Engineered removals Activity Requirements ☐ Other *Insert name here*

5.4 | Project deviation history

Is there any deviation request(s) for the same project activity/PoA/VPA(s) that was submitted to GS previously? If yes, below information.			☒ Yes ☐ No
Reference number	*DEV_184 and DEVRQ-174*		
Status of the deviation	☒ Approved	☐ Rejected	☐ Under review

[6] Design certification date
[7] Date of first issuance approval by Gold Standard

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?	☒ Yes ☐ No
	Summary of the findings GS12251 – GS12263 – MP2 Performance Review Feedback CL1 GS12390 – GS12418 – MP1 Performance Review Feedback CL3

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	GS4GG Impact Quantification Methodology- "Emission Reductions from Safe Drinking Water Supply"
	Version	Version 2.0
	Paragraph	• Parameter Table SDWS 34, Table 11 Mitigation measure for parameter $U_{p,y}$, $X_{cleanboil,y}$ and page 95 w.r.t. SDWS 34 and SDWS 26 • Para 14.5.5 and para 16.1.4, sub point (a) and (c) and Annex-1 Section A1.2.2 (b) 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 (e.g. not expected to occur beyond one monitoring period)	☒ Permanent (e.g. deviation from requirements prior to submission for certification)
	Identical deviations (DEV_184 and DEVRQ-174) have already been approved for PoA GS11189 for the second crediting period. However, those approvals were granted under the Methodology for Emission Reductions from Safe Drinking Water Supply, Version 1.0. With the availability of the updated Paris Agreement Aligned (PAA) methodology, the CME is proactively submitting this deviation request to enable the application of a harmonized and consistent sampling and monitoring approach across all VPAs within the same country.	
Relevant monitoring period, if applicable	Start date	01/01/2026
	End date	--
	☐ NA	
Summarise the changes	The PoA GS11189 and its VPAs are based on GS4GG approved large scale methodology "Emission Reductions from Safe Drinking Water Supply" version 2.0, 09/07/2026. **Specific authorization is requested for the following requirements of the methodology for project surveys:** I. As per applied methodology "Emission reductions from safe drinking water supply version 2.0, 09/07/2026" parameter table SDWS 34 - *Sampling shall be stratified by technology age (cohorts)".* This parameter table refers to para 14.5.5 of the methodology which states that, "*For HWT/IWT activities (Method 2), sampling for Usage Surveys $U_{p,y}$, $X_{cleanboil,y}$ shall be stratified by*	

	the age of the technology (cohorts) to ensure the results are representative of the adoption and drop-off rates across the operational population. The minimum sample size requirements apply to each cohort." II. ***Table 11*** Mitigation measure for parameter $U_{p,y}$, $X_{cleanboil,y}$ also mandates for a cohort-based sampling for (HWT/IWT) technologies for determining potential overestimation. III. Para 16.1.4 of the methodology, subpoint (a) also mandates for a cohort-based homogeneity criterion. Additionally, page 95 of the methodology mandates a cohort stratification for parameter SDWS 34 ($U_{p,y}$) and SDWS 26 ($X_{cleanboil,y}$). Similar requirement is outlined under section A1.2.2 (b) of the applied methodology. IV. *Also, para 14.5.3 of the applied methodology, refers to a minimum sample size of 50 per group or stratum.* V. *Para 16.1.4, sub point (c) of the applied methodology prohibits grouping more than 10 VPAs together.* The PoA has 103 small sale VPAs that include Water Purification System (WPS) in Nigeria and Kenya. These 103 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 103 VPAs under the PoA are distributed in Nigeria (61 VPAs) and Kenya (42 VPAs). The VPAs in each 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 multi-folds. 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 project surveys for each WPS technology irrespective of their age and grouping more than 10 small scale VPAs together.

An illustration for Nigeria in next monitoring period (Due for performance review) wrt to sample size is given below:

Project Scenario-1 (UltraFlo)			
Sample Size - Operational Units			
WPS Type (Sampling Frame)	*Total Sales (Sampling Frame Size)*	*expected operational rate (%)*	*Calculated Sample Size (n)*
UltraFlo	10,000	90%	50
Sample size determination			
Estimated Operational Units (p)			90%
Estimated Standard Deviation of Operational Units (SD)			30.0%
$V = (SD/p)^2$			0.11
Sample Size required (Operational Units)			**50**

Project Scenario-2 (UltraTab)			
Sample Size - Operational Units			
WPS Type (Sampling Frame)	*Total Sales (Sampling Frame Size)*	*expected operational rate (%)*	*Calculated Sample Size (n)*
UltraTab	35,000	90%	50
Sample size determination			
Estimated Operational Units (p)			90%
Estimated Standard Deviation of Operational Units (SD)			30.0%
$V = (SD/p)^2$			0.11
Sample Size required (Operational Units)			**50**

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 simple random sampling approach has been applied considering two distinct project scenario(s).
3. For each project scenario, the minimum sample size is considered 50. In the above example, the sample size arrived for UltraFlo and UltraTab was only 43 samples which was considered as 50 instead, as per the applied methodology.
4. Total sample size, therefore is 100 (=50 + 50), which is in line with the applied methodology.

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 programme of activities", version 04.0.

Reason for deviation	The aforesaid deviation has already been approved for PoA GS11189 for the second crediting period. However, those approvals were granted under the Methodology for Emission Reductions from Safe Drinking Water Supply, Version 1.0. With the availability of the updated Paris Agreement Aligned (PAA) methodology, the CME is proactively submitting this deviation request to enable the application of a harmonized and consistent sampling and monitoring approach across all VPAs within the same country. Alternatively, without this deviation approval, (considering age, technology and 10 VPA groups), 2,000 – 2,500 samples would need to be monitored for methodology compliance, which is not feasible to

<table>
<tr><td></td><td>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 – 120 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 precedented in the DEV_184 and DEVRQ-174 Approved Decision(s). The same has been verified multiple times and approved under the performance certifications under the PoA till date.</td></tr>
<tr><td>Proposed resolution</td><td>Given the aforesaid VPAs are identical, hence the CME shall be allowed to conduct project surveys for each WPS 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 simple random sampling approach applied for sample size calculation for monitoring surveys 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).

<u>The aforesaid has already been demonstrated in each of the 6 performance certifications that have been taken under Nigeria and Kenya each, under the PoA.</u></td></tr>
<tr><td>Is there any potential temporary or permanent impact of deviation on other aspects of the project?</td><td>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)

<table><tr><th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/ removal after applying deviation</th></tr><tr><td>XYZ tCO_2e</td><td>XYZ tCO_2e</td></tr><tr><td></td><td></td></tr></table>☐ any other matrix, please specify…
☐ NA</td></tr>
<tr><td>Summary of the impact</td><td>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.</td></tr>
<tr><td colspan="2">Insert text here</td></tr>
</table>

6.3 | VVB information

Is a VVB opinion on the deviation request required? *VVB opinion shall be included, where required by the requirements under Deviations Request Requirements and Procedures or request is submitted by the VVB.*	Yes ☐ No ☒ Identical deviations (DEV_184 and DEVRQ-174) have already been approved for PoA GS11189 for the second crediting period.

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.*)

Document 1. ***(Approved Deviation Request Forms) :*** DEV_184-Deviation-Request.pdf and DEVRQ-174-Deviation-Request.pdf

Document 2. ***(GS12390 – GS12418 – MP1 Performance Review Feedback) :*** GS11189 VPA 01-30 & 74-102_PERR_RF GS Decision.pdf

Document 3. **(GS12251 – GS12263 – MP2 Performance Review Feedback)** : GS11189 VPA 31-47 49-61_PERR_RF_GS Decision_ISSR.pdf

DOCUMENT HISTORY

VERSION NUMBER	RELEASE DATE	DESCRIPTION
6.1	15.05.2026	Editorial and structural changes to the template
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