



Gold Standard[®]
for the Global Goals

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **16.07.2020**

Version **3.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date - 15/10/2020

1.2 | Decision – Approved

The deviation request is approved, and PD is allowed a one-time extension of 5 years for projects stoves (starting from the date of completing refurbishment), subject to compliance with all the following conditions:

- i. Beyond the extension provided, the refurbished project stoves shall be replaced with new project stoves in order to be eligible for crediting. No further extensions will be provided.
- ii. An Objective Observer (OO) shall be appointed mandatorily to perform on-site visit at the time of next verification of the project. The OO shall ensure that they visit and provide their assessment on the usage/operation of a sample of the refurbished stoves.
- iii. The PD shall record and maintain a repair/replacement record for claiming the extended lifetime of project stoves and provide this as part of the next performance certification review. The PD shall also maintain other evidences of refurbishing, as mentioned in the deviation form below.
- iv. The sampling approach for testing the efficiency of the refurbished stoves must include stoves that are representative of repaired and non-repaired groups.
- v. The PD must be able to demonstrate that the repair of stoves results in an efficiency improvement. Any stove with efficiency below 20% shall not be eligible for crediting.
- vi. Both the verifying VVB and SustainCert shall review and provide their opinion on the project's compliance with all the above conditions at the time of next verification.

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

2| Background information

Deviation Reference Number	DEV_154	
Date of decision	15/10/2020	
Date of submission	08/09/2020	
Project/PoA/VPA	<input checked="" type="checkbox"/> Project	ID – GS1296
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Dissemination of TLUD improved cook stoves in the Sundarbans, India	
Location of project/PoA/VPA	India	
Scale of the project/PoA/VPA	<input checked="" type="checkbox"/> Microscale <input 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/171	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project	
Title/subject of deviation	Deviation request regarding the default replacement of devices after the end of their life span as of AMS-II.G.	
Specify applicable rule/requirements/methodology and version number	AMS-II.G., version 10: "Energy Efficiency Measures in Thermal Applications of Non-Renewable Biomass". AMS-III.BG, version 3: "Emission reduction through sustainable charcoal production and consumption ".	
Specify the monitoring period for which the request is valid (if applicable)	Start date: Aug 01, 2019 — End date: Jul 31, 2026	
Submitted by	Contact person name: Dr. Katrin Mikolajewski	
	Email ID: mikolajewski@atmosfair.de	
	Organization: atmosfair gGmbH	
	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 type="checkbox"/> NO <input checked="" type="checkbox"/> If yes; VVB name: Auditor name:	

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3| Deviation detail

3.1 | Description of the deviation:

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 guidelines for requesting deviations, given in the Deviation Approval Procedure.

Dear Vikash Talyan,

atmosfair is running several efficient cookstove projects in India. In line with AMS-II.G, we usually use a water boiling test to determine $B_{y,savings\ i,j}$ and a sampling and monitoring approach (para 37 c or d) to account for the annual efficiency drop. Information on lifetime/life span of the project devices is provided according to manufacturer's specification.

In the next years the stoves deployed under the project GS1296 will reach the end of their theoretical lifetime/life span as of the manufacturer's specification ("more than 7 years").

However, due to good maintenance, after sales service and repair service, the majority of these stoves is still operational and in good condition, which is shown through the zero drop-outs in the annual monitoring even after 7 years of usage. Please see the latest Monitoring report of GS1296 MP1 of the second crediting period.

Thus we would like to request clarification on para 33 of the methodology AMS-II.G version 10 (and similar paragraphs of previous and later methodology versions): *If the life span of devices is less than the crediting period, it shall be demonstrated that the devices shall be replaced after the life span has ended. In such cases, if it cannot be demonstrated that the project devices will be replaced with new devices, no emission reductions can be claimed beyond the life span of the project devices.*

In our view, the default replacement of the entire device after the end of the theoretical life span is not reasonable. The full replacement of an operational stove is cost- and material-intensive, and thus highly unsustainable, especially if it is a high quality stove. In addition, for projects offering good after sales service, warranty on the products and repair service, the default replacement might make the services uneconomical and lead to discontinuation of these services.

We would thus like to clarify if:

At the end of the theoretical life span a demonstrated replacement of essential parts of the stoves (e.g. replacement of the burning chamber) may be applied instead of a full replacement of the devices? The documentation of the replacement could be done e.g. through the purchase or production receipts for new stove parts, pictures from the replaced stoves, payment receipts for the replacement work, etc. The replacement of the replacement of essential parts of the stoves (e.g. replacement of the burning chamber) will take place after the end of the theoretical life span, even if the parts are not broken.

We would like to suggest, that the default replacement of devices after the end of the life span/lifetime as per AMS-II. G version 10 is extended for the GS Microscale project by the following options:

After the end of the life span of the devices one of the three options shall be demonstrated:

- a) the devices are replaced after the life span has ended.
- b) essential parts of the stoves (e.g. the burning chamber) are replaced after the life span has ended. Life span of such partly replaced stoves is extended by 5 years according to the manufacturers specification. A random sample (90/10) of the partly replaced stoves can be tested to ensure the efficiency of these stoves is above 20%.
- c) no ER are claimed for the stoves after the life span has ended and for which no repair or replacement as of options a) and b) can be demonstrated.

The information, which of the options was used for the stoves will be added in the stove database.

Thank you for the consideration.

Kind regards,

Katrin Mikolajewski

VVB opinion (if applicable):

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3.2 | Assessment of the deviation:

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

The calculation of emission reductions is not affected, since all replacements and stove removals will be documented and the efficiency of the stoves where parts are replaced will be determined in a sample.

This deviation might lead to a more sustainable approach to maintain a project. The full replacement of an operational stove is cost- and material-intensive, and thus highly unsustainable, especially if it is a high quality stove. In addition, for projects offering good after sales service, warranty on the products and repair service, the default replacement might make the services uneconomical and lead to discontinuation of these services.

Also Project developers might decide to not replace the old stoves with new ones in a running project, but include the new stoves into a new project with longer crediting period. This will have a negative effect on the stove users of the old project, since they will not receive repair service for their stove. The old project might be abandoned.

VVB opinion and recommendation (if applicable):

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3.3 | Impact of the deviation:

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.

No effect is expected on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project.

VVB opinion (if applicable):

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3.4 | Documents:

List of documents provided