

DEVIATION REQUEST FORM

PUBLICATION DATE **16.07.2020**

Version **3.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 17/11/2020

1.2 | Decision – Approved

The deviation request is hereby approved. Considering the unique situation (existence of project site in a refugee camp), the project has been granted an exception and allowed a deviation from the rule stated in paragraph 5.1.46 of the [GS Principles and Requirements](#), whereby it can claim emission reductions for the gap period from 01/01/2019 to 14/05/2020.

The above decision is subject to fulfillment of the following two conditions:

- I. The CME shall ensure that the PoA/VPAs demonstrably comply with all relevant monitoring requirements within the gap period of 01/01/2019 to 14/05/2020.
- II. The VVB and/or SC shall review all relevant project documentation and provide their confirmation on the justification provided on the change in the CME.

Precedent Statement:

The GS decision on this deviation request sets a precedent for projects operating under identical conditions. The project is allowed to claim a part of their gap period following a delay in submitting request for renewal of its crediting period, if it can demonstrate that -

- a) The delay in applying for CP renewal was due to exceptional circumstances, for example the project's presence in a refugee zone/conflict area.
- b) The project has all the monitoring data available in compliance with the methodology version applicable at time of renewal of crediting period.

The maximum allowable gap in such cases is -

- a) 1 year for non-LDC/LLDC/SIDS
- b) 2 years for LDC/LLDC/SIDS

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_158	
Date of decision	17/11/2020	
Date of submission	09/09/2020	
Project/PoA/VPA	<input type="checkbox"/> Project	
	<input checked="" type="checkbox"/> PoA	ID – GS1075
	<input checked="" type="checkbox"/> VPA	ID – GS3445
Project/PoA/VPA title	Solar Cooking in Chad	
Location of project/PoA/VPA	Republic of Chad	
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/1609	
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 from GS4GG principles and requirement, section 5.1.46 regarding delay in design certification renewal so as to obtain full credits for the 2 nd crediting period of the project (01/01/2019 to 31/12/2025)	
Specify applicable rule/requirements/methodology and version number	Principles and requirement, version 1.2, published in October 2019, paragraph 5.1.46 indicates " <i>Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay).</i> "	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/01/2019	End date 14/05/2020
Submitted by	Contact person name: Gert Crielaard	
	Email ID: crielaard@fairclimatefund.nl	
	Organization: FairClimateFund B.V	
	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	Yes <input type="checkbox"/> NO <input checked="" type="checkbox"/>	

rules/requirements or request is submitted by the VVB).	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.

The CME (FairClimateFund) is requesting a deviation from section 5.1.46 of the GS4GG principles and requirements, for project Solar Cooking in Chad so as to obtain VERs for emission reductions that occurred during the period 01/01/2019 to 14/05/2020 as part of the 2nd crediting period.

The delay between the end of the 1st crediting period (31/12/2018) and the moment at which documents were submitted to begin 2nd crediting period renewal (14/05/2020) is due to the unique difficulties the project has had to face since its registration and also to the particular character of its original and former CME (AAA). However, AAA began looking for a new CME to take over management of the project from as early as August 2018, indicating his willingness to ensure its continuation as soon as possible after the end of the 1st crediting period. Attempts to submit documents to start the 2nd Crediting Period renewal were made in February 2019, while discussions with the current CME, FairClimateFund, began in April 2019.

In summary, on one hand, the former CME (AAA) only sold its first batch of VERs in June 2018, and on the other hand from August 2018, it had been looking for an organization to take over the CME role. These meant that it did not have the resource to undertake the renewal of the crediting period, nor it made sense for the former CME to invest in such a process. Once the new CME (FairClimateFund) was identified and took over in Sept. 2019, it did not have the resource either to start the crediting period renewal and waited for the 2nd verification of ER to have certainty over risk and resources. The renewal of the CP only started (14/05/2020) once there was greater certainty to issue VERs from the 2nd monitoring period (internal verification was started 13/03/2020 and completed on 22/06/2020).

Among carbon projects, the Solar Cooking in Chad is one of a kind. It is the only carbon project in Chad, possibly the only (or among the very few) project taking place in a refugee camp and is promoting the cleanest of all cooking technologies: solar cookers. It is also a very challenging project to managed as it is in the middle of desert and is fully funded by the sale of VERs.

The project has been facing a high level of uncertainty since registration even though it has made critical contributions to improving the livelihoods of some of the most deprived populations on the planet (refugees from Darfur) in one of the poorest area of Africa (eastern Chad). Some of these uncertainties include the absence of stable revenues during the first years of the first crediting period, overall lack of technical and financial resources, organisational issues and the costs associated with the GS's monitoring process having to be carried out in a particularly remote area of eastern Chad (one of the poorest regions of this country), in refugee camps, with highly unsafe/insecure conditions.

More precisely, since the end of the 1st monitoring period (June 2016), the project has been facing multiple issues:

- I. Lack of stable financial resources:
 - a. The project only sold its first and only significant batch of VERs (9,200) in June 2018 to Carbon Neutral Group (VERPA available upon request). No significant sale had taken place until Q4 2019 (by the new CME) and the revenues of carbon was used to cover the certification process as well as some of the project costs;
 - b. Most importantly, the PD has been using his personal savings to fund the running costs of the project since 2010-12 until these ran out.
 - c. The PD saw the sale of carbon emission rights as critical to ensure the financial stability of the project from its inception, confirming good faith
- II. Organisational issues:
 - a. From August 2018, the former CME (AAA) had been looking for a new CME to take over the management of the project (see doc. *Example of emails sent by former CME in Aug. 2018* and attached communication between AAA and potential new PD), notably due to the initial CME representative reaching 86 years old (see <https://prabook.com/web/derk.rijks/484224>) and being sick with cancer. As noted above, attempts to submit documents to start the 2nd Crediting Period renewal were made in February 2019, while discussions with the current CME, FairClimateFund, began in April 2019 (see *examples of emails exchanged by a representative of the former CME -Herman Rijks- with a representative of the current one -Gert Crielaard- and emails sent by an employee of the former CME - Friederike Kosche- inquiring about how to submit documents to begin CP renewal review with Sustaincert*). In Sept. 2019, a contract between the former CME and the new CME was agreed upon and activities started being resumed, confirming the PD's good faith in inscribing GS certification at the heart of the project's design.
 - b. The lack of resources led to former CME to navigate the GS rules on its own without being successful at carrying out monitoring (see review of the 2nd Monitoring Period) as required and request the crediting period renewal.
 - c. Once the new CME (FairClimateFund) was identified and took over in Sept. 2019, it did not have the resource either to start the crediting period renewal and waited for the 2nd verification of ER to have certainty over risk and resources. The renewal of the CP only started (14/05/2020) once there was greater certainty to issue VERs from the 2nd monitoring period (internal verification was started 13/03/2020 and completed on 22/06/2020).

As stated above, the project has nevertheless brought important benefits and made critical contributions to global emissions reduction:

The project has brought extensive benefits to more than 40,000 households among the poorest groups living in refugee camps in the eastern part of the country saving time and reducing threats they were facing while having to collect wood outside of the camps.

It is now hoped that being able to issue credits over the period 01/01/2019 – 14/05/2020 via the present deviation request will allow the project to have the necessary resources to fund the project in Iridimi camp and expanded to one of the nearby camp. Hence, it will continue to make critical contributions to ER in Chad and provide socio-economic benefits to end-users. This project is fully funded by the sale of VERs.

The lack of resources, management and safety issues described above have prevented the hiring of a GS4GG certification consultant until September 2019. For these reasons, no surveys have been carried out until December 2019-January 2020. From March 2020, the COVID-19 pandemic also began to affect management and logistical efficiency of the CME as well as the GS4GG certification consultant and submission of documents for crediting period renewal could not take place before May 2020.

As of the time of this request, the new CME would like to ensure he can monetize all emission reductions enabled through the project to ensure he can take charge of the long-term management and monitoring costs of the project so as to ensure its continuation into 2021 and beyond. While this has not been precisely accounted for, this would represent around 3,000 to 5,000 VERs.

Hence, the CME requests that SustainCERT grants him an authorization to deviate temporarily from the principles and requirement rule stated in paragraph 5.1.46 and be issued credits stemming from the project for the period 01/01/2019 to 14/05/2020 and be authorized to started the 2nd credit period a day after the end of the 1st one.

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.

As stated above, the present request is to deviate from requirement 5.1.46. Apart from this rule, the project complies with all other requirements.

In particular, data used to determine the amount of credits issued during the delayed period will be based on a monitoring and usage survey which was carried out in December 2019-January 2020. This survey gives an accurate, and conservative picture of current users and usage patterns of the solar cookers in the project area (Iridimi refugee camp). This data will be used to account for emission reductions that occurred during the period 01/01/2019 – 14/05/2020. The survey provided complete data since it confirmed:

- Continuous usage of the cookers throughout 2019
- No new distribution of cookers in 2019, confirming a relatively conservative number of cookers currently in use in the iridimi refugee camp since the end of the last crediting period
- The project’s continuous contribution to SDGs (No Poverty; Good health and well-being; Affordable and Clean Energy; Climate Action)

Data obtained during this survey has been used to account for the 2017 and 2018 and is more conservative than if it had been collected in 2017 and 2018 since it is older. Older usage data would imply more conservativeness since the rate of dropout and the baseline stove usage can only go higher with time. Furthermore, results from data collection actually lead to more conservative emission reductions. This data is also accurate since the data collected is the same that would have been collected in 2017 and 2018, but older.

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.

Out of the potential impacts of the requested deviation on total number of credits issues, emissions reductions, SDG impact, monitoring frequency, data quality and/or potential risk, only the total number of credits issued in the 2nd crediting period (01/01/2019 to 31/12/2025) would be impacted.

Other parameters can be considered as follow:

- Emissions reductions: the requested deviation will have no impact on these. Primary data collection has actually led to more conservative emission reduction calculation, given expected usage rate dropoff;
- SDG impacts: the requested deviation is related to the management of the project only. As such, it will have no impacts on the project SDGs, unless the CME cannot or is not allowed to issue VERs for the delayed period as a result of the GS decision. In this case the new PD will have to take charge of the project costs for a longer period of time, which could be detrimental to its ability to enable it to continue managing the project;
- Potential risk: there is no risk that is perceived in this request. Conservativeness is possibly the most significant consideration and it is dealt with in the previous section.

VVB opinion (if applicable):

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3.4 | Documents:

List of documents provided

- ER calculation for 2016, 2017 and 2018 based on survey data collected in December 2019 and January 2020
- AAA-FCF contract transferring ownership of the project from the original PD to the present PD
- Example of emails sent by former CME in Aug. 2018
- Example of emails sent by former CME in February 2019 to sustaincert, inquiring about how to submit documents to begin CP renewal review
- Example of emails exchanged between the former and current CME in April 2019 in which the former CME is asking confirmation that the current CME, FairClimateFund is willing to take over management of the project.