

DEVIATION REQUEST FORM

PUBLICATION DATE **16.07.2020**

Version **3.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 05/02/2021

1.2 | Decision

The deviation request is approved whereby the project developer is allowed to:

- I. claim emissions reductions and other SDG impacts for a gap period equivalent to two years retroactive from the crediting period renewal approval date.
- II. carry out combined verification (along with retroactive issuance of a maximum of 2 years) and renewal of crediting period of the project.

The above decision is subject to fulfilment of the following conditions:

- a. The project developer shall justify existence of exceptional circumstances in Uganda that are affecting project operations (i.e., implementation and monitoring) by providing credible evidence in support of this claim and VVB's opinion on the suitability of conducting an on-site visit (both during the pre and post COVID-19 period).
- b. The project developer shall highlight gaps in monitoring data (caused by intermittent monitoring) in the project documents and shall apply conservative monitoring approaches to parameter values, as appropriate.

The validating/verifying VVB shall assess the PD's compliance (and supporting documents) with the above conditions and provide their opinion in the Validation/Verification Report. SustainCert shall subsequently review both the PD's compliance with the above conditions and VVB's assessment and opinion on the same.

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_167	
Date of decision	05/02/2021	
Date of submission	27/01/2021	
Project/PoA/VPA	<input checked="" type="checkbox"/> Project	ID – GS1044
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Up Energy’s Improved Cookstove Carbon Project, Uganda	
Location of project/PoA/VPA	Uganda	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/39	
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 issue emissions reductions for two years prior from the date of design recertification.	
Specify applicable rule/requirements/methodology and version number	GS4GG principles and requirement, section 5.1.46 states "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 Product 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)."	
Specify the monitoring period for which the request is valid (if applicable)	Start date 15/06/2018 End date 14/06/2025	
Submitted by	Contact person name: Anantha Karthik	
	Email ID: anantha@upenergygroup.com	
	Organization: UpEnergy Group	
	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"/> If yes; VVB name:	

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

As per the Gold Standard, GS4GG principles and requirement, version 1.2, dated 24th October 2019, section 5.1.46 "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)."

The deviation request submission is based on precedence set from the Gold Standard Deviation number- DEV_158 which states:

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

UpEnergy Group is requesting a deviation from the above requirement for the project GS-1044: Up Energy's Improved Cookstove Carbon Project, Uganda. The project targets rural and poor communities in Uganda. The project has so far been able to reach 44,000 poor households and provides them with clean and efficient cooking technology. The project participant is requesting for deviation as it was not feasible for the project to get the re-validation completed in time, due to following reasons –

1. The delay was primarily due to safety constraints in visiting the project region as this is based in conflict areas of Uganda i.e. these areas have witnessed several incidents of violence in the last few years. The travel to these areas had also been restricted. Below are some of the publicly available news/information regarding these regions:

- a) <https://africacenter.org/spotlight/escalating-tensions-between-uganda-and-rwanda-raise-fear-of-war/>
- b) <https://www.dw.com/en/uganda-riots-over-alleged-torture-of-lawmakers/a-45138760>
- c) <https://www.garda.com/crisis24/news-alerts/226776/uganda-political-protests-reported-in-kampala-april-30-update-4>

2. There were several attempts made by the project participant for completion of the design recertification related activities. However, due to several of the project areas falling into conflict/refugee regions in Uganda, it was not feasible to conduct VVB site visit in 2018 and in 2019. Furthermore, it has also not been possible for UpEnergy to identify Objective Observers to carry out site visit as per GS rules for audits of projects in conflict zones.
3. In 2020, there were further challenges due to COVID19 pandemic, which had hampered the ability to travel and visit the project regions. Although we do acknowledge that this is not the primary reason for the delay in CP renewal.

During this duration, the project participant has maintained the monitoring data, which has been collected remotely in these regions through intermittent surveys/field visits that have been possible using local sales agents. In addition, local distributors have been able to maintain and distribute further devices during this period, especially during 2018 and 2019, in line with our commitment made to the end-users. During 2020, new sales have been hampered due to COVID-19.

We would like to further submit that due to the non-renewal of the crediting period and no further issuances, UpEnergy's programme GS ID-1044 is finding it challenging to continue the service, maintenance and sales of cook-stoves under the project resulting in the risk of end-user shifting to traditional stoves. Uganda is a LDC country where the precedence statement (DEV_158) has allowed for a 2-years gap in design recertification. In order to continue carrying out these activities, UpEnergy is requesting for this deviation to be approved based on the precedence statement.

Additionally, if GS deems that the deviation can be approved, we would also like to request that the project be allowed to combine the re-registration audit with verification audit for retroactive issuance of 2 years.

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. Regular usage surveys and KPTs are carried out for the gap period. For some of the years, the project may not have all relevant vintages covered as per the requirements of the TPDDTEC methodology. This is because of limited access to the project area. However, in such cases, the PP will forfeit the ERs and ensure that conservativeness is achieved.

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 issued, 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. Emissions reductions would be calculated and accounted in line with provisions of registered monitoring plan and methodology.
- 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. In fact allowing the deviation would help the project participant to service the user base more efficiently and with better financial resources, PP can reach many more users and thus advance SDG impacts
- 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

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