



DEVIATION REQUEST FORM

PUBLICATION DATE **14.1.2021**

Version **4.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 21/02/2022

1.2 | Decision

The applied deviation request is approved. As per the provisions of para 4.1.17 of the [Principles and Requirements](#), the Project Developer may develop their project parallel to the methodology review and approval process. The Secretariat acknowledges the receipt of project developer submission methodology revisions.

Thus, in this case, a delay in the starting and completion of re-validation shall **not** result in the reduction of the issuance of emission reduction during the following certification cycle, as required by para 5.1.45 & 5.1.46 of the [Principles and Requirements](#).

The decision is only applicable to VPAs included in this deviation request (as mentioned under background information below).

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

| | | |
|---|---|---|
| Deviation Reference Number | DEV_237 | |
| Date of decision | 21/02/2022 | |
| Precedent (YES/NO) | No | |
| Precedent details | N/A | |
| Date of submission | 11/02/2022 | |
| Project/PoA/VPA | Project | |
| | <input checked="" type="checkbox"/> PoA | GS2747 |
| | <input checked="" type="checkbox"/> VPA | VPA01 - GS2750 VPA02- GS2751 VPA03 - GS4236 VPA06 - GS5801 |
| Project/PoA/VPA title | African Biogas Carbon Programme (ABC) (GS 2747) and VPAs <ol style="list-style-type: none"> 1. African Biogas Carbon Programme (ABC) - Kenya - VPA001 2. African Biogas Carbon Programme (ABC) – Tanzania – CAMARTEC – VPA002 3. African Biogas Carbon Programme (ABC) – Uganda -VPA003 X. African Biogas Carbon Programme (ABC) - Kenya - VPA006 | |
| Location of project/PoA/VPA | Host country(ies) Kenya, Uganda and Tanzania | |
| 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 | PoA: https://registry.goldstandard.org/projects/details/1639 VPA01: https://registry.goldstandard.org/projects/details/1644 VPA02: https://registry.goldstandard.org/projects/details/1645 VPA03: https://registry.goldstandard.org/projects/details/1646 VPA06: https://registry.goldstandard.org/projects/details/1652 | |
| 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 | Postpone date of submission of VPA RCP documents in lieu of delayed publication of new methodology and consideration of methodology revision request, without reduction of VER issuance |
| Specify applicable rule/requirements/methodology and version number | TPDDTEC v3.1 |
| Specify the monitoring period for which the request is valid (if applicable) | Start date End date |
| Submitted by | Contact person name: until 1 March 2022: Harry Clemens Email ID: hclemens@hivos.org |
| | Organisation: Hivos |
| | Project participant: Yes Please note CME role is in transition from Hivos to ABPL |
| 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 type="checkbox"/> Not applicable If yes; VVB name: Auditor name: |

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):

As of principle and requirements, 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).*

Hivos/ ABPL (CME of the PoA) request a deviation from this requirement, as follows:

Delay in the completion of re-validation beyond the last date of current certification cycle shall NOT 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 reason for the deviation is as follows:

On 6 October 2020 HIVOS submitted a methodology revision request for TPDDTEC v3.1. This revision request was developed based on the observation that monitoring requirements for project with technologies with a long lifespan are becoming disproportionate with advancing project age leading to high costs and a significant monitoring effort by having to survey almost 500 households in some cases¹.

On the same day GS confirmed receipt:

We are initiating the revision of TPDDTEC methodology and will consider the requested changes accordingly. We expect to have a revised version by Jan/Feb 2021.

On various occasions the GS indicated that the new methodology would be published, starting from early 2021 (by email communication, through online meetings and announcement on the website), but despite this, the methodology has not been published.

¹ E.g. VPA03: 14 age-group * 35 = 420 households + 60 participating in the PFT = 480

This deviation applies to the VPA’s that are preparing for RCP. Given the cost of re-validation and design change, the project developer wishes to combine revising the VPA-DD’s concurrent with adopting the new methodology. The delay in publishing the methodology has led to delay in preparing the RPC which is risking or has already resulted in not reaching the submission deadline (CPII start date), consequently leading to a shortening of the second CP.

Given the effort HIVOS has put in preparing revision requests² and the delay it caused with the re-validation, this deviation is requesting for additional time to complete the RCP, as put forth in the table below:

| VPA | Deadline submission RCP documents (CPII start date) | Reason and justification of delay | Propose deadline |
|-----|---|--|---|
| 1 | 12/06/2020 | submission of revision request in October 2020 | 10 months after publication of the approved methodology |
| 2 | 06/01/2021 | revision request in October 2020 | |
| 3 | 18/04/2022 | revision request in October 2020 | |
| 4 | 03/03/2024 | revision request in October 2020 | |
| 6 | 13/03/2023 | revision request in October 2020 | |

A 10-month period after the official publication date of the new methodology would allow for sufficient time to update the documents (~3 months), the validation (~ 4 months) and a buffer of 3 months for unforeseen circumstances.

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

N/A

² Connected energy technologies in close cooperation with HIVOS’ consultants also prepared a revision request which was submitted in January 2021

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):

This deviation request deviates from the requirements. In principle and requirements, 5.1.46 it is stated that: *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 delay resulting from the delayed publication of the upcoming methodology will therefore result in a submission for the re-validation beyond the last date of the current certification cycle.

The accuracy, completeness and the conservativeness however are not affected. The contrary might be the case as upcoming methodology will rely on updated IPCC guidance on establishing the manure management baseline (IPCC 2019 guidelines instead of IPCC 2006) and will be based on recent CDM methodologies. Thus, the most recent scientific insights will be applied which should improve the overall assessment and accuracy of the emission reduction calculations.

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

N/A

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):

The impact is immaterial. Other than the delayed submission, the quality of data used for the baseline re-assessment and other data sources remain the same. The assessment is provided in the table below:

| Impact | Assessment |
|----------------------|--|
| Project design | The project design, in terms of scale and target group remain the same (although the CME may want to consider to extent the target group to rural households, SMEs and institutions owning medium-sized biodigesters). However, the methodology, the ER calculations and the monitoring system will be updated as per guidance in the upcoming methodology |
| SDG assessment | No impact expected. The approach to all the SDG, apart from SDG 13 remains the same. The SDG 13 assessment will follow the guidance in the upcoming methodology |
| Emission reductions | As above for SDG 13 |
| Monitoring frequency | This might change, depending on the possibilities in the upcoming methodology. However, in any case, the project will comply with the methodological requirements on monitoring frequency of the various parameters |
| Potential risk | No additional risks are expected. |

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

N/A

3.4 | Documents:

Methodology revision request (6 October 2020)

**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.)*