

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **14.1.2021**

Version **4.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 10/06/2022, 20/03/2023

1.2 | Decision

Extension of previous decision (20/03/2023)

The deviation request regarding extension of previous deviation (which gives grace until 31/03/2023 to implement the sensor/meter and comply with the methodology) for parameter SWDS 23 is approved and the grace period is extended by 3 more months until 30/06/2023.

The project developer must ensure that:

1. Continuity in the project's monitoring activities is maintained, and the project developer 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 section 3 of the [Deviation Approval Requirements and Procedures \(version 1.2\)](#) and overarching GS principles (as applicable).
2. The deviation request, its implications, and GS' decision is documented in the appropriate section of the GS PDD and Monitoring Report (for the relevant MP).

The validating and verifying VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above-mentioned condition(s) and provides its opinion in the Validation and/or Verification Report.

SustainCert shall review both the project developer's response and the VVB's assessment/opinion of the same and take appropriate steps

Initial decision (10/06/2022)

The deviation requested for parameter SWDS 1 is **not approved**.

Since v2.0 of the methodology (previously TPDDTEC) published, a distance-based eligibility requirement is in place. This limitation on the eligibility of end-user is to ensure that the project provides access to safe water but also improves the accessibility where the end-user community is lacking even the basic access. Additionally, this eligibility criteria is also relevant since further the source of clean water is, the more likely the users are to be tempted to use unsafe water sources available in proximity since carrying water is an arduous task. Using unsafe water sources even occasionally negates or reduces the use of safe water on other days. The requested deviation will lock in the end-users in a baseline situation for accessibility for the entire crediting period. Therefore, the project developer is expected to improve the accessibility where needed to meet the basic service level definition.

Deviations requested for parameter SWDS 23 are **approved until 31/03/2023**. The CME may claim emissions reduction for the monitoring period until 31/03/2023 provided that:

- Default values for water consumption per capita are applied and
- Monitored data confirms a minimum 1200 litre/day water discharge per water point. This may be measured on a sampling basis, following the section 4.2- General requirements for sampling of the methodology.

The developer must ensure the compliance with the methodology requirements for the period after **31/03/2023** by fully implementing one of the monitoring options specified in the methodology -

- Option 1: Flow meter measures water volume directly
- Option 2: Operation sensor measures directly operation time or pump stroke count, and volume is calculated as capacity (defined in the Project technology description) multiplied by operation time or pump strokes, depending on the sensor type.

Note that the projects/VPA will not be allowed to request issuance for the period after 31/03/2023 when the project/VPA is in non-compliance with methodology requirements. No further deviation can be granted for parameter SWDS 23.

The PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS PDD and Monitoring Report (for the relevant MP). The validating and verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned condition(s) and provides its opinion in the Verification Report.

SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

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_255	
Date of decision	10/06/2022, 20/03/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	10/05/2022, 07/12/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS1247 and 7591
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	GS1247 Improved Kitchen Regimes GS7591 International Programme of Safe Water and Efficient Cooking	
Location of project/PoA/VPA	Burkina Faso Eritrea Ethiopia Gambia Kenya Malawi Mozambique Rwanda Sierra Leone Togo Uganda Zambia Zimbabwe	
Scale of the project/PoA/VPA	<input checked="" type="checkbox"/> Microscale <input checked="" 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/155 https://registry.goldstandard.org/projects/details/2206	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project	
Title/subject of deviation	Deviation to ensure supply of safe water	
Specify applicable rule/requirements/methodology and version number	GS ERSDWS SDWS 1 & SDWS 23	
Specify the monitoring period for which the request is valid (if applicable)	Start date	End date
Submitted by	Contact person name: James Walker	
	Email ID: james.walker@co2balance.com	
	Organisation: CO2balance UK Ltd	

	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:

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):

CO2balance have been implementing safe water supply projects under the Gold Standard Foundation since 2013. Since then, CO2balance has rehabilitated over 2,000 water sources in 14 countries. These projects have applied TPDDTEC version 1 and 3.1 and all will at some point transition on to GS ERSDWS.

The safe water supply projects provide safe water to communities in sub-Saharan Africa, predominately in rural areas. Typically, the baseline scenario is such that households rely on surface water and either treat the water by boiling or consuming unsafe water. These communities rely on the support of CO2balance, and the finance provided by the sale of GS VERs, to maintain the safe water sources.

It is essential that safe water supply projects can continue to run under GS ERSDWS. Otherwise, for existing projects, we will be met with a cliff-edge scenario where we must withdraw support from the projects when they reach the end of their crediting period. This would create a step backwards in development and cause end users to revert to consuming unsafe surface water. Many new projects will not be feasible, and GS will be denying millions of dollars of investment in rural water supply in sub-Saharan Africa. Hence, we are seeking deviation to two parameter requirements.

SDWS 1 - End users premises (e.g. households, institutions) within 1 km distance of project water source or a total collection time of 30 minutes or less for a round trip, including queuing, using the travel modes of walking or pedaling.

When the projects were developed it was not a requirement for all households to be within 1km of the project water source. Some water sources in very remote areas were rehabilitated under the project and serve large populations. Boreholes are sited depending on a number of factors, including geological and hydrological

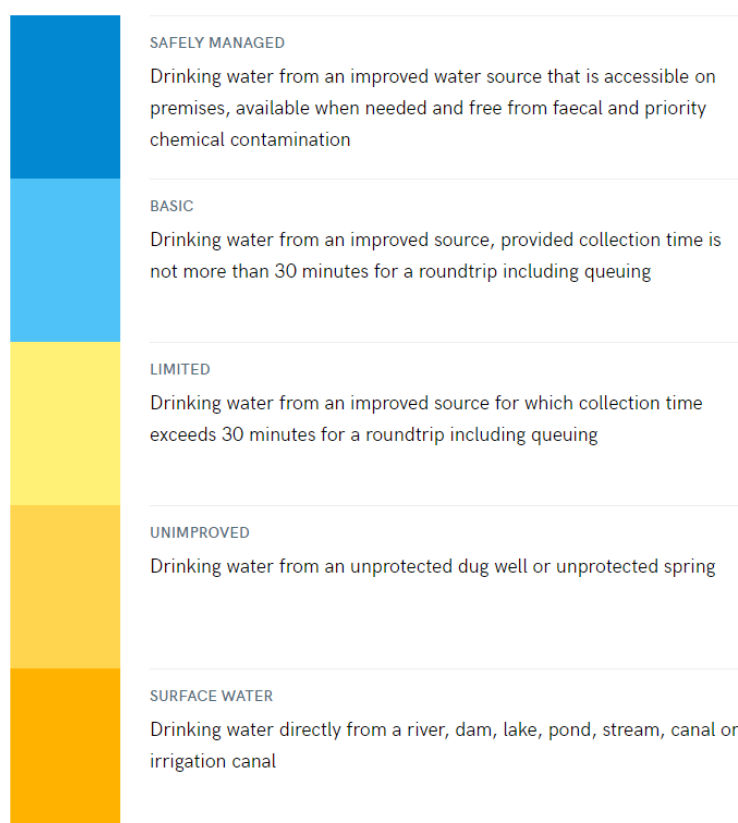
considerations – i.e. where it is suitable for pumping groundwater. These locations do not always match exactly with where rural farming communities are set up. GS/SC must understand that such communities rely on these water sources and do not cease to use a safe water source just because it is >1km from their household.

In “*sub-Saharan Africa...for 29 per cent of the population (37 per cent in rural areas and 14 per cent in urban areas), improved drinking water sources are 30 minutes or more away.*”¹ The goal of a safe water source being less than 1km away is aspirational and not yet a reality for many rural households. It is essential that the projects continue until there are other options for people to access water that is less than 1km away. Some end users travel further than 1km because there is not another option. Safe water is so important that users will collect water from the project water sources despite the distance, rather than reverting to unsafe surface water. The project areas are generally in rural areas, where funding is most needed. The UN found that “*in sub-Saharan Africa, one roundtrip to collect water is 33 minutes on average in rural areas and 25 minutes in urban areas.*”² Therefore, due to SDWS 1, GS SDWS is only suitable for urban water supply.

CO2balance are requesting a deviation from the 1km rule in SDWS. Instead, PD will monitor the number of users within 1km and over 1km, and report this as users with access to limited safe water supply and users with access to basic safe water supply:

¹ <https://www.unicef.org/turkey/en/node/2156>

² Ibid



JMP Drinking Water Ladder

If this request is denied, then CO2balance will have to withdraw support from existing projects which will cause communities to revert to consuming unsafe surface water, and far fewer projects will be viable, meaning that some of the poorest communities in the world will not be able to benefit from the safe water source programme. It cannot have been the intention of the SDWS methodology to cause people to descend the JMP drinking water ladder, or for communities to be denied the chance of progressing.³ The 1km rule will have the effect of only urban and peri-urban households benefiting from the finance provided by GSF. Therefore, we urge GSF to seriously consider this request and the negative effects of enforcing SDWS 1.

SDWS 23 - Monitored quantity of safe water provided by the CWS/CWT project in year y – flow meter or operational sensor

CO2balance have been trialing water meters and exploring different technologies to measure water yield from the project water sources. However, a suitable solution has not been found yet.

Analogue water meters are being trialed, yet some field teams are concerned that parts may be stolen or vandalised. This may have an additional negative impact of hand pump breakdowns. Some meters have led to pumps leaking and the flow of

³ <https://washdata.org/monitoring/drinking-water>

water being disrupted. These issues must be resolved before the technology is rolled out widely.

We have also had discussions with organisations to use digital water meters, however a suitable sensor is yet to be found. Issues have included lack of power, sensors requiring solar panels, lack of network coverage and meters not fitting the pump outlets.

Until a suitable technology is available, SDWS 23 cannot be met. The parameters concerned here are:

- Qpop,y - Quantity of safe drinking water that could be consumed by project end-users in year y (L)
- Qm,y - Monitored quantity of safe water provided by the project in year y (L)

The lowest value of the two is included in the ER calculation as Qy. We request that Qpop,y is applied as default while the required research and development is carried out on the devices which measures output from a handpump. This request is conservative as Qpop,y will always be a lower value than Qm,y. This is because only 4 litres of water per person per day can be claimed for the purposes of the project. A conservative number of users per handpump is 300, making the Qpop,y 1,200 litres per day. Literature supports 6,000 litres per day being provided by a handpump.⁴⁵⁶

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

This is not applicable.

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 request does not affect the accuracy, completeness, and conservativeness of the project. If the SDWS 1 requirement is enforced, then GS would actively prevent

⁴ Standard Foundation Safe Water Supply Grievance, Technical Advisory Committee Grievance Working Group, Investigation Report, 1 October 2020, p28 and p35

⁵ <https://www.rural-water-supply.net/en/implementation/handpump-overview/139-india-mark-ii>

⁶ <https://www.rural-water-supply.net/en/implementation/public-domain-handpumps/afridev>

contribution to the SDGs. The rule will remove access to safe water, taking people from “limited” or “basic” access to “surface water” on the JMP drinking water ladder.⁷

This would also mean breaching the GS Safeguarding principles and requirements. Access to safe drinking water is a human right under international law⁸. Enforcement of SDWS 1 will prevent thousands of people accessing safe water and will remove access to safe water for hundreds of thousands of people. This is contrary to Principle 1 a) and b) of the GS Safeguarding Principles and Requirements. Furthermore, this will disproportionately negatively affect women and girls, on whom the burden of collecting water generally falls (Principle 2) and have an adverse impact on the health and safety of the end user communities who will revert to drinking surface water (Principle 3).

For SDWS 23, $Q_{pop,y}$ will always be lower than $Q_{m,y}$, so the request is conservative and will not lead to over crediting.

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

This is not applicable.

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):

Project Design

The deviation for SDWS 1 and SDWS 23 will be noted in VPA-DDs at Design Certification or Re-Validation.

Safeguarding Principles Assessment

The deviation for parameters SDWS 1 and 23 will have a positive impact on safeguarding, as it will either secure access to safe water (existing projects) or enable access to safe water (new projects).

SDG Assessment

SDWS 1

⁷ <https://washdata.org/monitoring/drinking-water>

⁸ https://www.un.org/en/ga/search/view_doc.asp?symbol=A/RES/64/292

The level of water access will be monitored and reported in the MR as part of SDG 1 impact reporting.⁹

SDWS 23

The volume of water consumed per person per day for drinking water will either apply the default value of 4 litres or be capped at 5.5 litres. As stated above, applying $Q_{pop,y}$ over $Q_{m,y}$ is conservative.

Emissions Reductions

SDWS 1

GS VERs are essential for ongoing support and new investment in rural drinking water supply, which is essential to meet GSF's Safeguarding Principles.

SDWS 23

The deviation will have a conservative effect on ERs as $Q_{pop,y}$ will be a lower figure than $Q_{m,y}$.

Monitoring Frequency

SDWS 1

Total user lists will be collected in time for the first verification of each crediting period. Annual monitoring and maintenance visiting will be used to check whether these need to be updated.

SDWS 23

The total volume of water consumed by households per day is measured in the annual usage survey. The survey asks how many people are in the household and many jerry cans the household fills per day for ALL purposes (not only drinking water), which gives the per capita water consumption. This provides data which would otherwise be provided by SDWS 23 $Q_{m,y}$.

Data Quality

SDWS 1

No impact.

SDWS 23

The deviation will have a positive impact on data quality as the technology for measuring water supplied by a hand pump is not currently fit for purpose and risks providing bad quality data.

Potential Risk or any other Relevant Aspect of the Project

The purpose of the deviation request is to avoid risks associated with removing access to safe water.

⁹ SDG 1.4.1 Proportion of population living in households with access to basic services.

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

This is not applicable.

3.4 | Documents:

**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.)*