

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 22/06/2022

1.2 | Decision

Deviation request 1:

The deviation request is approved for the second monitoring period only (i.e., from 01/11/2016 to 09/10/2022). If PD is applying any additional methods of emission reduction calculation they may do so, however it shall be established that:

- At a minimum, compliance with the registered monitoring plan shall be maintained.
- Compliance with applicable GS4GG and methodological rules and requirements is maintained.
- The emission reduction calculation shall be conservative.

FAR for VVB:

The verifying VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above-mentioned conditions and provides its opinion in the Verification Report.

Deviation request 2:

The deviation request is approved for this monitoring period. PD shall ensure that the revision in the parameter frequency shall be done before/with next verification.

FAR for VVB:

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned condition and provide its opinion in the Verification Report.

Deviation request 3:

The deviation request is approved, but with restrictions.

The PD must ensure that:

1. The duration of the GS monitoring period is not more than three years from the date of remote site visit by a VVB. Since a site visit was conducted on 28/07/2021, PD can claim issuance not before 28/07/2018. The remaining years/months of the monitoring period before that will be foregone without any possibility of extension in the registered crediting period.
2. A continuity in the project's monitoring activities is maintained, and PD is able to 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).

The PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

FAR for the validation and verifying VVB:

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions 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_267	
Date of decision	22/06/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	13/06/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS1299
	<input checked="" type="checkbox"/> VPA	ID – GS2293
Project/PoA/VPA title	GS1299 India Organic Waste Management Programme-VPA01 (GS2293)	
Date of listing	NA	
GS Standard version applicable	GS toolkit v2.2 (DOE site visit)	
Date of transition to GS4GG (if applicable)	21/09/2021	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	NA	
Date of design certification/inclusion (if applicable)	NA	
Location of project/PoA/VPA	Host country(ies) : India	
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	https://registry.goldstandard.org/projects/details/311	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Temporary deviation from the monitoring plan	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	AMS I.E, version 12, AMS I.I V 5 and GS toolkit v2.2 (DOE site visit)	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/11/2016 End date 09/10/2022	
Submitted by	Contact person name: Mr. Swapan Mehra Email ID: swapan@ioraecological.com	

	Organisation: IORA Ecological Solutions Project participant: Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> NO <input type="checkbox"/> If yes; VVB name: 4K Earth Science Private. Limited UNFCCC Ref No. CDM-E-0069 Auditor name: Ma Paa Puratchikkanal
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

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):

The objective of the small scale PoA is to install biogas plants at household, community and institutional level to promote organic waste management in a pre-defined region in India. The biogas units installed under the PoA will enable generation of energy through production of biogas via anaerobic digestion of organic waste. The resulting biogas will be used for thermal and electrical applications. The biogas units will be installed in a geographically reasonable way to expedite their monitoring. Before project implementation, the fuel employed for thermal applications was firewood/fossil fuel and electricity was being sourced from the grid. The PoA seeks to replace the above with biogas generated by the units installed. Under this PoA, VPA-01(GS2293) was successfully implemented and one verification (1st Monitoring period: 10th October 2012 to 31/10/2016) is already been completed. At present we are preparing for 2nd monitoring issuance and we are in course of preparing respective documents for the same.

Deviation 01

As per the registered monitoring plan, the Parameter (Number of biogas plants operating) has to be monitored based on visits to the households with biogas units and AMCs. Yes, this has been followed in this monitoring period as well. Recently the PoA has been renewed with the new methodological version which provides the provision to monitor this parameter as per below explanation.

"As per the latest AMS I.E version 12¹, this parameter shall be monitored as per the requirements stipulated for "Proportion of $N_k,0$ that remain operating at year y (n_k,y)" under "AMS-I.I.: Biogas/biomass thermal applications for households/small users". As per latest AMS I.I ver 05, this parameter is monitored as per the option (a) listed. Net-to-gross adjustment factor of 0.89 is applicable in cases where the operationality is determined based on questionnaire survey i.e. when using option (a), to account for uncertainties"

So while preparing the MR the above-mentioned approach has been used to monitor the data. However, the number of operational days during the monitoring period for each of the system was determined to estimate the emission reductions (Number of operational days in the monitoring period minus number of non-usage days) for each of the biogas unit has been accounted to be more conservative. And finally, the total number of operational days are multiplied with 0.89 to estimate the overall emission reductions to avoid any uncertainties in the usage as per the new methodology version.

Deviation 02

Indicator/Parameter (Livelihood of the poor/Improvement of living conditions and health benefits): The monitoring frequency has been mentioned as "Annually" in the monitoring parameter table of the parameter in the registered monitoring plan. However, this parameter has been monitored biennially. PP had revised all the monitoring parameters frequency in the first monitoring issuance time. There was an omission of this parameter to revise the frequency to biennial. This parameter does not have any impact on overall emission reduction calculation.

¹ https://cdm.unfccc.int/filestorage/R/S/J/RSJ8Y23D6ZLXE9WHQ74CBNOVUGPKMI/EB110_repan06_AMS-I.E%20%28v12.0%29_clean.pdf?t=cEV8cmFqM3ZwfDBG_tH8R98GEwN_oXAM9PUv

Deviation 03

This deviation requested by VVB with respect to site visit as per GS toolkit v2.2. there was a delay in the site visits between 2 monitoring periods. This deviation is requested by VVB to GS and is detailed in the below section.

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

**Guidance* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

Deviation 01

Though PD has monitored the parameter as per the registered monitoring plan, PD additionally considered the adjustment factor of 0.89 as per the latest methodology version. As this is a conservative option, the approach is acceptable to VVB.

Deviation 02

Though the parameter (Livelihood of the poor/Improvement of living conditions and health benefits) is not monitored as per the frequency mentioned in the registered monitoring plan (ie, annually) and PP monitored the parameter in less frequency (ie, biennially). Considering the fact that this parameter is not used for emission reduction calculation, the deviation shall be accepted.

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):

Deviation 01

The mentioned approach is very conservative approach to estimate the overall emission reduction since it takes account of both uncertainties in the biogas usage and the non-operational days as well.

As per the registered monitoring plan, a survey (statistically determined number of households for each of the biogas capacity needs to be conducted biennially for a period of one week) has been conducted and found the biogas were operating. To be conservative and avoid any uncertainties in the biogas usage Net-to-gross adjustment factor of 0.89 has been multiplied with the overall operational days as per the methodology (AMS I.I, version 5). This approach will avoid any uncertainties in the measurements and is more conservative approach to estimate the emission reductions.

Deviation 02

This deviation do not have any impact on overall emission reduction calculations. There was a mistake while revising the PDD in the last monitoring report and PP has forgot to revise the same to biennial. PP wants to combine all the surveys and do one shot at a time since the biogas installations are spread across the state and is not easy for the PP to conduct the surveys every year due to time and financial resources.

The deviations do not deviate from any of the GS requisite requirements of GS4GG Viz, environmental integrity, contribution to SDGs, safeguarding principles and requirements and compliance to host country regulations since approach is in line with approved methodology (PoA renewal methodological versions), do not negatively impact on any of SDG parameters , safeguarding principles and requirements and complies to host country regulations.

Hence PP requests GS to accept the deviations.

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

**Guidance* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

Deviation 1:

Though the deviation has impact on overall emission reduction, it will result in conservative emission reduction estimation. Also, this deviation does not affect monitoring frequency, data quality and/or any potential risk.

Deviation 2:

The deviation affect the monitoring frequency of the SDG parameter. However, this does not affect emission reduction calculation. It shall also be noted that there is no potential risk involved in this.

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):

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From the above deviation, there will be no negative impacts as discussed in the above section. And the new will adhere to all the GS4GG rules and requirements.

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

****Guidance*** If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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These deviations do not adversely affect project design, safeguarding principles assessment, SDG assessment, emissions reductions, data quality, potential risk or any other relevant aspect of the project.

Only the monitoring frequency of a SDG parameter will have adverse impact, however, this does not affect emission reduction calculation and hence the deviation can be accepted.

Deviation 03 requested by VVB

The PP had approached 4K Earth Science for verification of the project of the "VPA : GS2293:India Organic Waste Management Programme-VPA01" in March 2021, the contract was signed to undertake the assignment of verification for the above mentioned VPA on 17/04/2021. In the due course of verification, it was observed that the PoA was due for renewal in October 2019 and not been done. Then, the PP had

approached GS to seek assistance for the VPA verification and was informed by GS to renew the PoA "India Organic Waste Management Programme" GS 1299 before verification of the VPA.

Hence, the first step of renewal of PoA was considered and taken up with concurrence from GS. Please refer to the mail communications between GS and the PP. The PoA had only one VPA, and the Renewal of PoA was carried by us and completed. The site visit was conducted during the PoA renewal from 28 /07/2021 to 29/072021.

Only after the approval of the PoA renewal, the verification was of the VPA commenced and the site visit was conducted from 14/09/2021 to 15/09/2021. Hence, a deviation for non-conduct of site visit at VPA level could not be provided to the GS, due to the above said reasons, as the site visit was done in July 2021 at PoA level. However, now, we apologize for not seeking a deviation, hence, we request to provide a deviation for delayed site-visit for the verification of the "VPA : GS2293:India Organic Waste Management Programme-VPA01".

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.)*

Version number	Release date	Description
5	11.04.2022	<p>Additional information added:</p> <ul style="list-style-type: none"> - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved <p>Guidance on VVB opinion</p>
4	14.01.2021	

3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption