

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 06/10/2022

1.2 | Decision

The deviation is approved. However, the PD shall ensure that the Objective Observer (OO) has been selected for the on-site audit as required by para 2.1.2 of the Annex B of [Principles and Requirements version 1.2](#) and have conducted the audit under the guidance of a GS-approved VVB.

The validating/verifying VVB shall ensure the following:

- a. The Objective observer (OO) is selected to conduct the assessment as per the checklist provided.
- b. The site visit conducted by the OO during the verification shall confirm the status of the project operation and the mitigation plan in place to tackle the negative impacts of the project.
- c. Assess and demonstrate how the selected OO has prior experience working in conflict zones/areas that pose a high risk to life and/or

health. The VVB shall also demonstrate OO's involvement in other activities within the project's geographical area.

The VVB shall report the above-mentioned information in the verification report.

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

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_303	
Date of decision	06/10/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	22/08/2022	
Project/PoA/VPA	Project	ID – GS 10824
Project/PoA/VPA title	Nazava Water Filter Project in Ethiopia	
Date of listing	31/08/2020	
GS Standard version applicable	GS TPDDTEC v3.1 PRINCIPLES & REQUIREMENTS Version 1.2 SITE VISIT AND REMOTE AUDIT REQUIREMENTS AND PROCEDURES Version 1 .0 Annex 2	
Date of transition to GS4GG (if applicable)		
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)		
Date of design certification/inclusion (if applicable)	31/08/2021	
Location of project/PoA/VPA	Ethiopia	
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/2781	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Deviation for Site Visit exemption and delay in field activities due to project area in conflict zone.	

<p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p>	<p>TPDDTEC v3.1 Section A3.3.E "Water quality must be tested every quarter, with the first test within 6 months of the stated project start date" Section A3.4 "The project proponent shall report the activities conducted each year in the annual monitoring report" Section 3.C.a" monitoring survey is to be completed annually, beginning 1 year after project registration". Section 3.C.b "Usage Survey - Completed annually, or more frequently, and in all cases on time for any request of issuance" PRINCIPLES & REQUIREMENTS Version 1.2 Annex B and 5.1.26 – site visit requirements</p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>Start date 1/09/2020 End date 31/12/2021</p>
<p>Submitted by</p>	<p>Contact person name: Chetan Aggarwal Email ID: Standards@southpole.com, c.aggarwal@southpole.com Organisation: Swiss Carbon Value Ltd. Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes; VVB name: VVB Staff name(s):</p>
<p>Any previous deviations approved for the same project activity/PoA/VPA(s)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

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):

Nazava Water Filter Project in Ethiopia is a water purification project registered (design certified) under Gold Standard.

As per gold Standard Principles and Requirements (PAR) Version 1.2, Section 5.1.26, Verification includes a site visit by a VVB who assesses the following against all Gold Standard Requirements including applicable Activity Requirements, Gold Standard Methodology and Product Requirements:

- (a) The Monitoring Report (including any updates in Annual Reports)
- (b) All supporting evidence and documents included by the Project Developer to demonstrate conformity

Considering that the civil war conflict in Tigray of Ethiopia has resulted in some field activities for the project being halted until the project proponents deem it safe for their staff to continue with field activities. The conflict which has been raging for more than a year and has escalated and is affecting the area of our projects in Wello, Gonder, Amhara. The area has been taken over by the rebellion group of Tigray People's Liberation Front.

Please refer to the following news articles for more detail.

<https://www.aljazeera.com/news/2021/8/26/ethiopia-rights-commission-says-150-killed-in-attack-in-oromiya>

<https://epo.acleddata.com/2022/07/20/epo-weekly-9-15-july-2022/>

<https://www.seattletimes.com/nation-world/more-than-200-feared-dead-in-ethiopia-massacre/>

<https://reliefweb.int/report/ethiopia/ethiopia-humanitarian-access-snapshot-january-june-2022>

Project proponents' opinion due to the above rationale, it is unsafe to carry out field activities for the immediate future some field activities including physical site visit activity Water purification project is Ethiopia is a community-based projects which involves household visits located within the cities that are affected by the conflict. Hence, Annex B of GS PRINCIPLES & REQUIREMENTS Version 1.2. section 1.1.1 applies. Considering the situation in the project area deviation is requested for appointment of objective observer for the field visits as per Annex B section 2.1.2 of GS Principle and Requirements V.1.2. Remote audit in line with annex 2 of SITE VISIT AND REMOTE AUDIT REQUIREMENTS AND PROCEDURES v.1.0 can be conducted for this monitoring period i.e., 1/09/2020 to 31/12/2021

This would include-

- a. Recording of Video/telephonic conversation with the end user. The project will take due precautions and must not record any conversation without seeking prior consent from the end user.
- b. Photographic evidence –photographs of the project water purification units will be gathered , where possible, to collect visual data on the status, safe water storage practices, etc. of the unit.

Nazava Trading PLC have checked on the water points following the conflict, they have found no water filters damaged.

Also, Field activities affected that may get postponed/delayed:

- Quarterly Water Quality Testing
- Usage and Project Surveys
- Hygiene campaign monitoring

Also, Water quality test will be performed with the help of mobile water quality test kits as it is inexpensive option. However, to verify the result from this mobile kit, every two years, an accredited third-party laboratory will be used.

Methodology components affected:

TPDDTEC v3.1 Section A3.3 Application of the Monitoring Methodology for Water Treatment Project Scenarios due to the conflict, Nazava Trading PLC's field staff may not be able to undertake the required monitoring.

This will include:

- TPDDTEC v3.1 section A3.3.E states "Water quality must be tested every quarter, with the first test within 6 months of the stated project start date. In addition, PPs shall ensure that water quality is tested at least once during seasons where there is a high chance of contamination, for example, the rainy season. Local non-accredited laboratories can do the quarterly water quality testing. However, at least once every two years, accredited laboratories must perform the water quality testing."
- TPDDTEC v3.1 Section A3.4 states "The project proponent shall report the activities conducted each year in the annual monitoring report. Any major changes in the health status of the water users as a result of contaminated water (e.g. an outbreak of water related disease) must be reported and, if relevant, a strategy put in place to address it through the hygiene campaign"
- TPDDTEC v3.1 Section 3.C.a states the monitoring survey is to be "completed annually, beginning 1 year after project registration".
- TPDDTEC v3.1 Section 3.C.b states "Usage Survey - Completed annually, or more frequently, and in all cases on time for any request of issuance".

As the Water Consumption Field Test schedule tend to be delayed due to the situation at the project location and hence is included in deviation request.

To summarize, the Tigray conflict has impacted the water quality test schedule of the project. There is also the potential that annual monitoring surveys, such as the monitoring and usage surveys, could be affected as the situation has not entirely stabilized in the region.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.*

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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):

PP is trying to provide WQT but there could be a delay which could be addressed in FAR keeping this deviation request valid till the condition in the project area returns to normal. Also, deviated schedules will be resumed as soon as it is possible to do so. In addition to this, Quarterly water quality testing will resume once the conflict situation is stabilized. To maintain the integrity of the project the PD and project partner have closely monitored feedback from communities through phones to check working status of the filters and ensured immediate repair and maintenance services

Monitoring Surveys by VVB deviation:

This deviation is to make SustainCert aware that there is a risk that the conflict will affect the PD's ability to undertake some monitoring activities. It is highly uncertain to conduct physical visit from VVB for verification of the project equipment. Instead, remote site visit will be conducted for the project which will be in line with SITE VISIT AND REMOTE AUDIT REQUIREMENTS AND PROCEDURES Version 1 .0 Annex 2. Also, it is highly uncertain whether the Usage Survey and annual WASH training where hygiene campaigns occur will be postponed. If these activities are postponed, a further deviation request will be submitted to Gold Standard with an approach that will account for conservative assumptions and/or discount factors to emission reductions claimed for monitored parameters affected.

The conflict situation is beyond the PD's control; however, the nature of this deviation is temporary, and the project will revert to its original design after the conflict has resolved.

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.*

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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):

1. **Project Design:** No change. Project Survey, Follow-ups that include hygiene campaigns monitoring and Water Quality Test will occur. Though, the postponement length is very uncertain, it is outside the control of the project developer.
2. **Safeguard principal assessment:**
The project has been registered under GS version 2.2. The project will consider the gap analysis between "Do No Harm" assessment and will evaluate the current implementation against the latest version of the Safeguarding Principal and requirement. To ensure the project is complied with safeguard principles on social, economic, and environmental & ecological aspects will be verified.
3. **SDG assessment:**
The SDG impact of the project will be assessed during the upcoming verification once conflict settles. The following SDGs impact would be demonstrated; SDG6, SDG8 & SDG13

4. **Emission reduction:**

The ex-post value will be verified by approved VVB. The project participant would take principle as per Gold Standard claim guidelines into account and for conservativeness

5. **Monitoring frequency:**

Since there is no change in the project design, the monitoring frequency remains as per the registered PD. However, this will be reassessed by the approved VVB during the forthcoming verification.

6. **Data quality:**

No data quality is impacted. The data will be in line with the QA/QC section explained in registered PDD. VVB could check and prove the accuracy & transparency of the data during the upcoming verification, once situation is stabilized.

7. **Potential risk or any other relevant aspect of the project**

No impact in this component, however it could be evaluated during the verification when the situation is stable in project area.

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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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.)*

1. <https://www.aljazeera.com/news/2021/8/26/ethiopia-rights-commission-says-150-killed-in-attack-in-oromiya>
2. <https://epo.acleddata.com/2022/07/20/epo-weekly-9-15-july-2022/>

3. <https://www.seattletimes.com/nation-world/more-than-200-feared-dead-in-ethiopia-massacre/>)
4. <https://reliefweb.int/report/ethiopia/ethiopia-humanitarian-access-snapshot-january-june-2022>