

TEMPLAT

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

B. To be completed by Gold Standard

1 | Decision

1.1 | Date – 22/09/2022

1.2 | Decision

The applied deviation is approved exclusively for this monitoring period (i.e., 16/07/2017-14/06/2020). However, the PD shall:

- I. Ensure that the verification site visit frequency stated under clause 3.1 of the [Site Visit and Remote Audit Requirements and Procedures – V1.0](#) will be followed in the subsequent verifications.
- II. Ensure that they claim the credits for the remotely verified monitoring period of three years (i.e., 16/07/2017 – 14/06/2020) considering the COVID-19 induced restrictions during the current MP only. But shall follow the regular verification cycles for all the subsequent verifications.

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). The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provide 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_304	
Date of decision	22/09/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	20/09/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	GS4534
	<input checked="" type="checkbox"/> VPA	VPA 01-GS2500, VPA 02-GS6108, VPA 03-GS6109, VPA 04-GS6111, VPA 05-GS6112, VPA 06-GS6113, VPA 07-GS6114, VPA 08-GS6115, VPA 09-GS6116
Project/PoA/VPA title	<p>PoA Title: Improved Cookstoves Program in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento”</p> <p>VPA Title: VPA 01 - Improved Cookstoves Project Activity in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento” CPA No 001 VPA 02 - Improved Cookstoves Project Activity in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento” CPA No 002 VPA 03 - Improved Cookstoves Project Activity in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento” CPA No 003 VPA 04 - Improved Cookstoves Project Activity in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento” CPA No 004 VPA 05 - Improved Cookstoves Project Activity in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento” CPA No 005 VPA 06 - Improved Cookstoves Project Activity in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento” CPA No 006</p>	

	VPA 07 - Improved Cookstoves Project Activity in Honduras "Vida Mejor con Ecofogones de Alto Rendimiento" CPA No 007 VPA 08 - Improved Cookstoves Project Activity in Honduras "Vida Mejor con Ecofogones de Alto Rendimiento" CPA No 008 VPA 09 - Improved Cookstoves Project Activity in Honduras "Vida Mejor con Ecofogones de Alto Rendimiento" CPA No 009
Date of listing	01/01/2018
GS Standard version applicable	GS4GG
Date of transition to GS4GG (if applicable)	14/07/2022
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not Applicable
Date of design certification/inclusion (if applicable)	12/04/2016
Location of project/PoA/VPA	Host country(ies)
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/800
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	Verification Visits
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Site Visit and Remote Audit Requirements and Procedures – V1.0, clause 3.1.1 COVID 19: INTERIM MEASURES, clause 4.3.1
Specify the monitoring period for which the request is valid (if applicable)	Start date 16/07/2017 End date 14/06/2020
Submitted by	Contact person name: Rohit Lohia
	Email ID: Rohit.lohia@envirofit.org
	Organisation: Envirofit International
	Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<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 checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes; VVB name: TuV Nord</p> <p>VVB Staff name(s): Prakash Mishra</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:

3.1.1 | Deviation detail (to be completed by Project developer):

The PoA titled, Improved Cookstoves Program in Honduras “Vida Mejor con Ecofogones de Alto Rendimiento” and its concerned VPAs (VPA 01-09) are seeking issuance under GS4GG for monitoring duration (16/07/2017 – 14/06/2020).

The CME has completed the verification for the concerned monitoring period and submitted the relevant documents to Sustain-Cert for performance review. The CME is seeking deviation for the concerned monitoring period against the following requirements, based on feedback received from SustainCert:

1. Site Visit and Remote Audit Requirements and Procedures – V1.0, clause 3.1
2. COVID Interim Measures para 4.3.1

1. The GS4GG Site Visit and Remote Audit Requirements and Procedures – V1.0, clause 3.1) states the following:

3.1.1 | At minimum, the VVB shall conduct physical site visit

a. Within two years of project start date; and

b. Once every three years after the first physical site visit

This guidance was published on 17 Nov 2021 and entered into force on 18 Dec 2021. The site visit for the concerned monitoring period was conducted during 14-16 Dec 2021 which is prior to the entry into force of the aforesaid requirement. Prior to this, the physical site audit was conducted in Jan 2018 for these VPAs. Also, the monitoring period being verified is from July 2017 – Jun 2020, which is much before the publication date of “Site Visit and Remote Audit Requirements and Procedures” and hence its application on the concerned monitoring period is deemed superfluous.

The CME requests deviation against GS4GG Site Visit and Remote Audit Requirements and Procedures – V1.0, clause 3.1, given it was not applicable

when the VVB conducted the site visit. Please refer the GS4GG performance review feedback for more details.

2. COVID Interim Measures para 4.3.1 states the following:
4.3.1 The maximum monitoring period that VVB can verify based on remote audit (paragraph 4.1.1 b) is two years.

It's critical to note that during the COVID-19 pandemic, there was a complete lockdown in the Host Country of Honduras where movement in the field was not permitted. Even if one could get past roadblocks, citizens were very guarded to outsiders and visitors were not welcomed by the households. Hence, remote auditing techniques were applied for the above audit. The CME followed the recommendations and COVID 19: INTERIM MEASURES of the GS Board published on 06/04/2020, which exempted onsite audit due to COVID-19 Pandemic and related worldwide travel restrictions (subsequently extended till June 2022).

As per COVID interim measures, the length of monitoring period that can be verified remotely is limited to two years. The VVB has verified the monitoring period duration of 3 years together. It was simply not possible to limit the duration of the monitoring period to two years (i.e. July 17-July 2019) as this would have resulted in not being able to issue credits of 2020 vintages which fell under delivery obligation to the buyer. The CME had asked an extension in early 2021 from the buyer for delayed delivery due to COVID and was not in a position to delay the issuance of 2020 vintage further, by commissioning a separate verification for the third year, given no further extension would have been granted by the buyer. If the monitoring period would have been curtailed to first two years, the audit being remote, it would have resulted in delays towards being able to issue 2020 vintages which was imperative for the CME to deliver to the buyers. In light of aforesaid, the CME requested the VVB to conduct the audit for three-year period.

Given the annual monitoring frequency requirement stipulated by the registered monitoring plan, the CME had conducted 3 annual monitoring events MS1, MS2 and MS3 pertaining to each year of the 3-year monitoring period. This provided the VVB an opportunity to objectively verify each year's monitoring data independently from the remaining years. During the audit, the verification team applied acceptance sampling to each monitoring session separately, thus, treating each monitoring year as a separate verification audit. Thus, while the VVB reported the audit outcome period in a single verification report, it considered separate independent acceptance sampling for each year, deemed equivalent to 3 annual audits.

The CME is committed to follow regular verification cycles moving forward, given COVID is now much under control globally and the COVID interim measures are no longer applicable unconditionally.

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

1. The requirement mentioned in **"Site Visit and Remote Audit Requirements and Procedures"** ver 1.0 was published only in November 2021 and came into force in December 2021 and is therefore not applicable for this verification. The contract between VVB and PD to perform this verification has been prepared on 21/09/2021 and signed by the client on 03/11/2021. The audit took place on 14-16 Dec 2021, even before this requirement came into existence/force. Due to COVID-19 pandemic, the project site could only be assessed remotely.
2. As per COVID interim measures, the maximum length of monitoring period that can be verified remotely is limited to two years as per the GS requirements. However, the VVB would like to highlight the important audit strategy adopted to ensure that the GS rule is abided in the spirit and word and simultaneously closing the verification in a timely manner. As an audit strategy, the VVB conducted acceptance sampling for each of the three monitoring years separately to ensure that the results established in each monitoring year is objectively assessed and verified. It is important to note that the VVB has not applied single sampling across all 03 monitoring surveys i.e. MS1, MS2 and MS3 combined. The VVB, conducted three remote on-site verifications (one for each year) rather than a single acceptance sampling audits across the 3 years combined. Thus, although the monitoring period covers 3 years, but verification on-site assessment (remote) has been performed for each of the three years separately. Further, based on PP's request and using professional judgement, the following has been assessed:
 - a) delivery schedule of the GS VERs to the buyers and related impacts of not meeting the delivery deadline of these credits
 - b) the history of the PoA i.e., delays in past submissions and CER labelling; and
 - c) underlying monitoring results presented under these three monitoring sessions covered under verification found being credible and realistic for ICS of given age categories

Based on the extensive professional experience of having audited multiple cookstove programmes, and practicing due professional care during the remote audit, the VVB was able to confirm that the credits being requested are credible, real, measurable, and accurate via remote assessment.

3.2 | Assessment of the deviation:

3.2.1 | Deviation assessment (to be completed by Project developer):

The deviation is not impacting the applicability, accuracy, completeness, or conservativeness of GHG assertion. The deviation is related to the Site Visit and Remote Audit Requirements and Procedures – V1.0, clause 3.1 and duration of monitoring period verified remotely.

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

The VVB requests on PP's behalf to approve the requested deviation and support the project in meeting the GS VERs delivery commitment.

The project has already suffered setbacks in the past due to challenging geo-political scenarios in Honduras, resulting in delays in labeling of VPA -02-09 under MP2. Further, delays shall result in compromising the sustainability of the

project, hence the VVB, based on aforesaid extensive audit approach confirms the emission reductions for the requested period to be credible and accurate.

3.3 | Impact of the deviation:

3.3.1 | Impact assessment (to be completed by Project developer):

The deviation does not impact the PoA/VPA design, safeguarding principles assessment, SDG assessment, Emission reductions, monitoring frequency or data quality.

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

Same as 3.2.2 above

3.4 | Documents:

GS4GG performance review feedback round 2

Version number	Release date	Description
5	11.04.2022	Additional information added: <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 Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption