

TEMPLATE

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2022**

Version **5.0**

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## A. To be completed by Gold Standard

### 1| Decision

**1.1 | Date – 27/09/2022**

#### **1.2 | Decision**

The requested deviation is approved whereby the PD/CME is allowed to continue the project without submitting the annual report for the MP i.e., 01/07/2018 to 12/01/2020. As per PD's justification retroactive project may be allowed to continue without submitting the annual report for each retroactive year and are not required to demonstrate compliance against paragraph 5.1.39 of [Principles and requirements](#). It should be noted that the exception is only applicable if the proposed project/VPAs are retroactive in nature and are able to demonstrate the progress and track key updates of the project, thereby confirming the project's status as active.

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 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_305	
Date of decision	27/09/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	19/09/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS10833
	<input checked="" type="checkbox"/> VPA	VPA 01-GS10974, VPA 02-GS10976, VPA 03-GS10977, VPA 04-GS10978, VPA 05-GS10979, VPA 06-GS10980, VPA 07-GS10981, VPA 08-GS10982
Project/PoA/VPA title	<p>VPA 01 - GS10974: Improved Cooking Stoves in Bangladesh – CPA No.12 "SZ Consultancy Services Ltd."</p> <p>VPA 02 - GS10976: Improved Cooking Stoves in Bangladesh – CPA No.13 "SZ Consultancy Services Ltd."</p> <p>VPA 03 - GS10977: Improved Cooking Stoves in Bangladesh – CPA No.14 "SZ Consultancy Services Ltd."</p> <p>VPA 04 - GS10978: Improved Cooking Stoves in Bangladesh – CPA No.15 "SZ Consultancy Services Ltd."</p> <p>VPA 05 - GS10979: Improved Cooking Stoves in Bangladesh – CPA No.16 "SZ Consultancy Services Ltd."</p> <p>VPA 06 - GS10980: Improved Cooking Stoves in Bangladesh – CPA No.17 "SZ Consultancy Services Ltd."</p> <p>VPA 07 - GS10981: Improved Cooking Stoves in Bangladesh – CPA No.18 "SZ Consultancy Services Ltd."</p> <p>VPA 08 - GS10982: Improved Cooking Stoves in Bangladesh – CPA No.19 "SZ Consultancy Services Ltd."</p>	
Date of listing	--	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)		

Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	23/08/2021
Date of design certification/inclusion (if applicable)	--
Location of project/PoA/VPA	People's Republic of Bangladesh
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	<a href="https://platform.sustain-cert.com/public-project/2178">https://platform.sustain-cert.com/public-project/2178</a>
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 from GS4GG principles and requirement, para 5.1.39 regarding submission of the annual report.
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	<p>GS4GG principles and requirement v1.2, section 5.1.39 states:</p> <p>"Transparent, annual update reports need to be provided for Projects that have achieved the Project Design Certification stage or have successfully transitioned to Gold Standard for the Global Goals. An annual report shall be submitted for each monitoring year by end of next calendar year for which verification is not completed. If a verification is in progress but not completed, then an Annual Report is still required by the end of calendar year."</p> <p><a href="https://globalgoals.goldstandard.org/101-par-principles-requirements/">https://globalgoals.goldstandard.org/101-par-principles-requirements/</a></p>
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/07/2018      End date 12/01/2020
Submitted by	Contact person name: Rohit Lohia
	Email ID: <a href="mailto:rohit.lohia@climate-secure.com">rohit.lohia@climate-secure.com</a>
	Organization: Climate Secure
	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).	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes; VVB name:</p> <p>VVB Staff name(s):</p>

Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> COVID_DEV 160
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### 3| Deviation detail

#### 3.1 | Description of the deviation:

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

The proposed GS PoA "Improved Cooking Stoves in Bangladesh" involves displacement of traditional, baseline wood stoves through dissemination of energy efficient woody biomass fired improved cook stoves (ICS) in various parts of Bangladesh (households/SMEs). The coordinating and managing entity (CME) for the proposed project is SZ Consultancy Services Ltd. (SZCSL). The subject PoA and the associated VPAs were registered under CDM and have undergone successful transitioning to GS4GG on 20/09/2021.

For the concerned monitoring period (stated on page 5 above) the PD hereby seeks clarification/deviation from the requirement 5.1.39 of the GS4GG principles and requirement v1.2, which states the following:

*"Transparent, annual update reports need to be provided for Projects that have achieved the Project Design Certification stage or have successfully transitioned to Gold Standard for the Global Goals. An annual report shall be submitted for each monitoring year by end of next calendar year for which verification is not completed. If a verification is in progress but not completed, then an Annual Report is still required by the end of calendar year."*

Further to aforesaid, the CME wishes to refer to SustainCert performance review feedback in this regard:

*GS10974, GS10976-10982 is design certified under GS4GG on 23 Aug 2021.*

- *MP1 01/07/2018 to 12/01/2020, in case GS verification not completed by end of 2021, annual report is requested to be submitted by end of 2021.*
- *MP2 from 13/01/2020, has PD submitted annual report by 2021?*

Considering aforesaid, the CME wishes to state the following :

1. Firstly, the aforesaid rule is not deemed applicable for retroactive monitoring periods. Otherwise, an annual report shall become due immediately after design certification, for the first retroactive year, in each retroactive project, that is operational for more than 2 years. For instance, if a project gets design certified on 30 Dec 2021, it shall render the PP with only 1 day to submit the annual report to GS / SustainCert for the first year of retroactive period. This would render the rule significantly partial to retroactive projects registering in last few months of a calendar year. A timeline till end of next year for submission of annual reports, from the year of design certification, allows at a minimum 1-year window, to all projects alike, to complete verification or else submit annual report thus giving the PD enough room to submit a verification report or an annual report.
2. Secondly, for the period 2018-2020, the verification site visit was completed in year Sep 2020, the verification was completed in Dec 2020 and the CERs were issued in Mar 2021, even before the design certification of the PoA and the CPAs, under GS4GG was achieved. The project MR and FVR were available on CDM website and were public even before the project was design certified. Also, in

2021, the PoA and VPAs were under transition review with SustainCert and hence SustainCert was fully aware of the status of the PoA.

3. Thirdly, the CME requests to consider para 5.1.44 of GS4GG principles and requirement v1.2, that says that the annual reporting is intended as an opportunity to share progress and track key updates and confirms to Gold Standard that the Project remains active. The following table summarizes tasks conducted since then in a chronological manner to further strengthen the fact that the project was active during the monitoring period.

Sl. No.	Standard	Task Description	Timeline
1.	CDM	Completion the verification site visit	Sep 2020
2.	CDM	Submission of verification report to UN	Dec 2020
3.	CDM	Issuance of CERs	Mar 2021
4.	<b>GS4GG</b>	<b>Registration/Design certification date</b>	<b>23/08/2021</b>
5.	GS4GG	Submission to DoE for GS audit for conversion of issued CDM CERs	13/01/2022
6.	GS4GG	Submission to GS for issuance review	17/03/2022
7.	GS4GG	GS 1 <sup>st</sup> round findings Received	08/06/2022
8.	GS4GG	Response to GS 1 <sup>st</sup> round findings	14/06/2022
9.	GS4GG	GS 2 <sup>nd</sup> round findings Received	01/08/2022
10.	GS4GG	Response to GS 2 <sup>nd</sup> round findings	17/08/2022

4. Lastly but not the least, this period was also affected by COVID to make the submission of annual reports not possible should that is deemed required, irrespective of aforesaid.

Thus, it is deemed implied that annual reports are not required for the concerned retroactive period by end of 2021. Further, please note that the CME commits to either submit an issuance request (i.e. verification report) or annual report before end of 2022 covering period subsequent to 13/01/2020, as applicable, against clause 5.1.39.

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

Not Applicable

### 3.2 | Assessment of the deviation:

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

As stated above, the deviation is from requirement 5.1.39 of GS4GG Principle and Requirements for the retroactive registration period of projects.

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

Not Applicable.

### 3.3 | Impact of the deviation:

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

No Impact envisaged

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

Please refer the GS4GG performance review feedback for more details.

### 3.4 | Documents:

Sustain review feedback round 2 for concerned PoA and VPAs.

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> </ul> Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption