

TEMPLATE

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2021**

Version **5.0**

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A. **To be completed by Gold Standard**

## 1 | **Decision**

**1.1 | Date – 28/11/2022**

**1.2 | Decision**

The requested deviation is **not approved**.

In-line with para 2.2.4 of the [Applicability of minimum site-visit requirements by VVB](#) the Project Developer shall:

1. Ensure that the duration of the GS monitoring period is not more than three years from the date of remote site visit by a VVB. For example, if the site visit is concluded on 01/05/2022, the MP cannot start before 01/05/2019 (inclusive).
2. Ensure that 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).
3. 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_321	
Date of decision	08/11/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	28/10/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	x PoA	ID – GS1265
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	African Biomass Energy Conservation PoA	
Date of listing	1/1/2018 (creation date as per SustainCert Platform)	
GS Standard version applicable	Gold Standard for the Global Goals	
Date of transition to GS4GG (if applicable)	27/6/2019	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	N/A	
Location of project/PoA/VPA	Host country(ies) Malawi and Rwanda	
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://registry.goldstandard.org/projects?q=&amp;page=3&amp;countries=MW">https://registry.goldstandard.org/projects?q=&amp;page=3&amp;countries=MW</a>	
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	GS1265 Site Visit 2019
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	
Specify the monitoring period for which the request is valid (if applicable)	Start date 16/3/2017 End date 28/8/2019
Submitted by	Contact person name: Conor Fox
	Email ID: conor.fox@hestianproject.com
	Organisation: Hestian Innovation Ltd.
	Project participant: Yes x 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 x No <input type="checkbox"/>  If yes; VVB name: Earthood Services Private Limited  VVB Staff name(s): Dr Kavi Singh; Ms Deepika Mahala & Ms. Jahnabi Kalita
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No x

### 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):

Under the PoA GS 1265, monitoring activities are conducted PoA wide and monitoring results from surveys and tests in each country are applied for all VPAs in this country.

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Monitoring activities are planned taking into account the provisions of the monitoring plan and the availability of operational stoves distributed under the PoA. Following a site visit in 2017 (for a previous monitoring period), a site visit was conducted in September 2019 (and was followed up by a virtual site visit in May 2022, <3 years later) but it was assessed by the VVB as not to have covered all 6 of the VPAs (5 VPAs in Malawi and 1 VPA in Rwanda).

The contract between VVB and PD was for PoA wide site visit, as was the work-plan GS.VER.19.20 submitted by VVB to PD (see attached). Since monitoring is performed PoA wide, the site visits organized during the verification process cover all VPAs included in the PoA even in cases when separate monitoring reports are prepared for the purpose of issuance process management.

Fixed Institutional Stove (FIS) users, from one the the VPAs (GS2444), were visited in Malawi in 2019.

However, end-users of domestics stoves in Malawi from (GS1330, GS2444, GS2445, GS2446 and GS2447) were not visited because they were no longer claiming credits, i.e. their estimated average life-span had passed. Therefore, there was households with operational stoves from which a representative sample could be selected. The last household stoves distributed under the VPAs terminated operational lifetime in the beginning of 2019: for VPA 1330 – 06/05/2019, for VPA 2444 – 08.02.2019, for VPA 2445 – 17.03.2018, for VPA 2446 - 11.01.2019, for VPA 2447 – 21.04.2019. Also GS2397 in Rwanda was not visited.

VVB did however do an on-site inspection in Malawi, conducted interviews with CME, on-site co-implementers and visited villages and households where the same stoves were used at the same time as part of a CDM visit.

**The VVB did verify through virtual site visit interviews, in May 2022, with project technology end-users that they had indeed been reached by the programme and had used the technologies.**

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.*

As per APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB para 2.2.4 , "The project may have more than two years (first site visit) or three years (follow up site visit) of monitoring periods before the site visit date, the remaining years of the

retroactive periods will be foregone without any extension of crediting period". The previous site visit for the VPAs was conducted on 19/04/2017- 22/04/2017. The follow-up site visit was conducted only for institutional cook stoves (FIS) in Malawi distributed under GS VPA GS2444. No onsite assessment or follow-up visit was conducted for the current verification of Portable Clay Stoves (PCS) distributed under GS1330 VPA, GS2445 VPA, GS2446 VPA, GS2447 VPA for Malawi & GS2397 VPA for Rwanda due to due to unavailability of monitored data in 2019 hence not meeting the condition set by para 2.2.4 of "APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB". Therefore, PD has submitted a request for deviation to Gold Standard.

However, the VVB has been able to complete the audit through remote audit for the current verification of Portable Clay Stoves (PCS) distributed under GS1330 VPA, GS2445 VPA, GS2446 VPA, GS2447 VPA for Malawi & GS2397 VPA for Rwanda in May 2022. Since the start date of the SV is in 2019 for the verification, there is no requirement for discounting the ERs for the current MP (16/03/2017 to 28/08/2019).

### 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):

A site visit was conducted in 2019 but did not include visits to end-users of project technologies that were no longer claiming ERs.

The VVB, on the same visit, also performed a site visit for the same PD for a CDM programme ([PoA10182](#)) using the exact same technology, targeting the same populations just with later dissemination dates (dissemination of domestic cookstoves stalled in 2015 for GS1265 to cater for a CDM contract with Norwegian Ministry of Climate & Environment). This CDM [verification report](#) can also be used for corroboration.

If it is decided that the GS PoA 1265 site visit in 2019 was not valid and that it is determined that ERs can only be claimed 3 years from remote site visit in 18/5/22, the PoA 1265 will lose >96% of the 450,015 VERs being claimed in the monitoring period 16/3/2017 to 28/8/2019, which would be catastrophic for the PoA.

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

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

Hestian Innovation Ltd. has contracted Earthood Services Private Limited (Earthood) to conduct the verification and certification of emission reductions reported for the 6 GS VPAs with GS IDs GS 2397, GS 1330, GS 2444, GS 2445, GS 2446 and GS 2447 under the GS registered PoA with ID- GS1265 "African Biomass Energy Conservation PoA" for the period 16/03/2017 to 28/08/2019. Hence, the work plan for the verification assignment was shared with the CME. The site visit as per as work plan was initiated in 10/09/2019. However, on-site visit was done only for institutional cook stoves (FIS) in Malawi distributed under GS VPA GS2444. Onsite assessment was not conducted for the current verification of Portable Clay Stoves (PCS) distributed under GS1330 VPA, GS2445 VPA, GS2446 VPA, GS2447 VPA for Malawi and GS2397 VPA in Rwanda as the lifetime of the stoves ended in the beginning of 2019. The site visit was later was conducted in May 2022 (18/05/2022-23/05/2022), remotely. During the remote interviews, no household was found to be using the baseline stove. The VVB thus confirms based on the remote interviews and on-site interviews that the CME has carried out the monitoring and parameter values are in accordance with the monitoring plan provided in PoA DD and the VPA DDs.

Further, RULE UPDATE-Applicability of minimum site visit requirements by VVB, version 2.0 was published on 16/08/2021 and therefore the conditions for establishing minimum site visit frequency requirements were unclear during the current monitoring period :16/03/2017 to 28/08/2019 (inclusive of both days).

Since the start date of the site visit is in 2019 for the current verification, there is no requirement for discounting the ERs for the current MP (16/03/2017 to 28/08/2019).

### 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):

The site visit in 2019 occurred when the stoves were no longer claiming ERs, when the risk of overclaiming for these stoves was zero. The site visit did include visits and interviews with management and operational staff; verification that monitoring activities were compliant with monitoring plan and applied methodology; data was properly recorded and archived; and monitoring personnel were interviewed. Therefore in terms of risk management, the site visit in 2019 performed the required activities.

### 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.*

The VVB conducted remote audit for the current verification of Portable Clay Stoves (PCS) distributed under GS1330 VPA, GS2445 VPA, GS2446 VPA, GS2447 VPA for Malawi & GS2397 VPA for Rwanda. 8 households were remotely interviewed from each usage survey conducted for PCS in 2017 and 2018 in Malawi under GS1330 VPA, GS2445 VPA, GS2446 VPA, GS2447 VPA by the CME (16 samples in total). 8 from each usage survey conducted for PCS in 2017, 2018 and 2019 under GS2397 VPA for Rwanda (24 in total). Based on which the VVB concludes that the deviation possess no significant impact on the overclaiming for these stoves distributed under the VPAs. Further, RULE UPDATE-Applicability of minimum site visit requirements by VVB, version 2.0 was published on 16/08/2021 and therefore the conditions for establishing minimum site visit frequency requirements were unclear during the current monitoring period :16/03/2017 to 28/08/2019 (inclusive of both days).



### 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.)*

Work Plan (Gold Standard for Global Goals) for Verification of Project Titled African Biomass Energy Conservation PoA For Hestian Innovation Ltd. Work Plan No. and Revision No. Write Project No GS.VER.19.20

CDM POA 10182 Verification Report 01 Jun 2018 - 31 May 2019

5	11.04.2022	<p>Additional information added:</p> <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> <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption