

TEMPLATE

# DEVIATION REQUEST FORM

---

PUBLICATION DATE **11.04.2022**

Version **5.0**

---

## A. To be completed by Gold Standard

### 1| Decision

**1.1 | Date – 11/11/2022**

#### **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**

**2| Background information**

Deviation Reference Number	DEV_322	
Date of decision	11/11/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	25/10/2022	
Project/PoA/VPA	Project	ID – GS5003
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Bamako Clean Cookstoves – Improving livelihoods and fighting desertification in the Sahel zone	
Date of listing	30/05/2016	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	01/12/2020	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not applicable	
Date of design certification/inclusion (if applicable)	03/12/2018	
Location of project/PoA/VPA	Host country(ies) Mali	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://registry.goldstandard.org/projects/details/874">https://registry.goldstandard.org/projects/details/874</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	On-site Verification conducted by an Objective Observer (OO)	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	<b>GOLD STANDARD FOR THE GLOBAL GOALS PRINCIPLES &amp; REQUIREMENTS</b> Version 1.2 Published October 2019	

	<p>ANNEX B – CONFLICT AND EMERGENCY ZONES</p> <p>1.1.1 Some Project Developers have faced considerable challenges in contracting VVBs for the Validation and Verification of projects located in conflict zones, refugee camps or areas that pose high risk to life and/or health. Gold Standard rules allow all Projects under these circumstances to combine Validation or Verification (based on a desk-review) with on-site Validation or Verification conducted by an Objective Observer (OO) that is retained by the Project Developer.</p>
Specify the monitoring period for which the request is valid (if applicable)	<p>Start date 01/11/2019</p> <p>End date 30/09/2022</p>
Submitted by	<p>Contact person name: Griselda Nathalia</p> <p>Email ID: g.nathalia@southpole.com registries@southpole.com</p> <p>Organisation: Swiss Carbon Value Ltd.</p> <p>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>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)?	<p>Yes <input checked="" type="checkbox"/> No <input 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):

The project is located in Mali. The security circumstances of the country pose high risk to life, which makes contracting VVBs very difficult. Therefore, the deviation is requested following rules and requirements of Gold Standard:

## GS4GG PRINCIPLES & REQUIREMENTS Version 1.2

### ANNEX B – CONFLICT AND EMERGENCY ZONES

1.1.1 Some Project Developers have faced considerable challenges in contracting VVBs for the Validation and Verification of projects located in conflict zones, refugee camps or areas that pose high risk to life and/or health. Gold Standard rules allow all Projects under these circumstances to combine Validation or Verification (based on a desk-review) with on-site Validation or Verification conducted by an Objective Observer (OO) that is retained by the Project Developer.

The project is applying for the deviation that the on-site Verification for the 2nd monitoring period (01/11/2019 – 30/09/2022) would be conducted by an OO.

#### Rationale of Deviation:

**1. Mali is a high-risk area:**

According to the travel advice from various embassies<sup>1</sup>, all travel to Mali should be avoided due to crime, terrorism, banditry, and kidnapping. Considering the recommendation from these embassies, project developer thus doesn't consider it as safe for foreigners to travel to Mali. For that reason, we would like to apply for exemption of the VVB site visit during the current verification period based on the Annex B rules.

**2. No VVBs are willing to go on-site:**

Project developer has inquired multi VVBs for on-site Verification of the project and received written feedback that they refused to go on-site in Mali due to the security situation of Mali.

---

<sup>1</sup> <https://travel.gc.ca/destinations/mali>  
<https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/mali-travel-advisory.html>  
<https://www.gov.uk/foreign-travel-advice/mali/safety-and-security>

### 3. Collaboration with experienced partners:

Swiss Carbon Value Ltd., the project developer, has been working on cookstove projects in Mali since 2015.

The local project owner, Katene Kadji, is the owner of GS project Improved Household Charcoal Stoves in Mali (GS414), and the current project Bamako Clean Cookstoves – Improving livelihoods and fighting desertification in the Sahel zone (GS5003). The local project owner is already very experienced, not only in its core business e.g., manufacturing, distribution of stoves, but also in data collection, survey organization etc. In the past validations and verifications, it also assisted the DOEs and objective observers to successfully conduct the verifications. Also, since the operation of the local project owner have remained constant over the past years and the environment in which the verification for the project to be conducted will be no different from the previous years, it is considered the collaboration can be sustained over the entire certification period of the project.

#### 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.*

Not applicable

### 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):

The deviation complies with the requirements specified in the Principles & Requirements Version 1.2 - Annex B – Conflict and Emergency Zones:

- (i) The project located in high-risk area as per description in section 3.1.1 above;
- (ii) Written correspondences from four auditors of refusing to go on-site in Mali have been received and provided;

- (iii) Project developer has established sustained collaboration with local project owner local consultants who have experience and involvement in the considered area over the entire certification period of the project, just as described in section 3.1.1 above;
- (iv) Name and contact details of three OOs have been provided for GS to select.

The OO will be selected by GS based on an assessment of their expertise, and OO would conduct the on-site Verification as per requirements from GS and VVB. So, the accuracy, completeness and conservativeness can be ensured.

### 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.*

Not applicable

### 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 deviation (OO to conduct the on-site Verification of the project) has no impact on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk, or any other relevant aspect of the project.

With on-site Verification being conducted by OO, the project design will not change, safeguarding principles and SDG assessments remain the same; emissions reductions are still calculated based on data collected through the monitoring activities as per the monitoring plan; monitoring frequency for each parameter remain the same as required

by monitoring plan; data quality is guaranteed by cross-check procedures stipulated in monitoring plan; and there is no other potential risk.

### 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.*

Not applicable

### 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.)*

List of documents and references

Item	Quoted rationale	Documents and references
Footnote 1	Mali Travel Advice from embassies of Canada, U.S., and UK	<a href="https://travel.gc.ca/destinations/mali">https://travel.gc.ca/destinations/mali</a> <a href="https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/mali-travel-advisory.html">https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/mali-travel-advisory.html</a> <a href="https://www.gov.uk/foreign-travel-advice/mali/safety-and-security">https://www.gov.uk/foreign-travel-advice/mali/safety-and-security</a>
Document 1	Written correspondence from four auditors refusing to go on-site in Mali	Letter from auditor 1_confidential Letter from auditor 2_confidential Letter from auditor 3_confidential Letter from auditor 4_confidential
Document 2	CVs of three OO candidates	CV_OO candidate 1_confidential CV_OO candidate 2_confidential CV_OO candidate 3_confidential



Version number	Release date	Description
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