TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 22/03/2023

1.2 | Decision

The applied deviation is APPROVED.

The PD must ensure that the request for design certification renewal is submitted by 30/06/2023.

The VVB must access all the evidence related to this deviation and include a clear validation statement in the validation report.

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_376	
Date of decision	22/03/2023	
Precedent (YES/NO)	NO	
Precedent details	N/A	
Date of submission	5/1/2023	
Project/PoA/VPA	Project	ID – GS6411
	☐ PoA	ID – GSXXXX
	☐ VPA	ID – GSXXXX
Project/PoA/VPA title	Household biogas project in Uttarakhand and Kerala, India	
Date of listing	15/04/2018	
GS Standard version applicable	GS4GG Principles and Requirements Version 1.2 of 23/10/2019	
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)	23/01/2019	
Location of project/PoA/VPA	India	
Scale of the project/PoA/VPA	☐ Microscale ☒ Small scale ☐ Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	GSF Registry (goldstandard.org)	
Status of the project/PoA/VPA	☐ New ☐ Listed ☒ Certified design ☐ Certified project	
Title/subject of deviation	Deviation with respect to Request of Crediting period(RCP) from March 31,2022 to December 31,2022,as the project first crediting period end by Apr 01, 2017 — Mar 31, 2022 and delay in RCP request submission and methodology version change AMS I-E	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	1- The **deviation 1** is with request to delay in submission of Request for crediting period to GS meeting December deadline following 3.1.5, of DEVIATION APPROVAL REQUIREMENTS AND PROCEDURES stating Project developers shall confirm in the monitoring report that the changes have occurred due to reasons beyond their control but is temporary in nature and the project will revert back to its original design after a given monitoring period. 2- The **deviation 2** is with respect to paragraph II of the revised project documentation as per the GOLD STANDARD PROCEDURES FOR THE RENEWAL OF A CREDITING PERIOD. If the registered GS project does not meet the criteria specified under (i) or (ii) above because the methodology has been revised or the baseline for the project has been updated, the project participant can either select another applicable approved methodology or request for a deviation from the existing approved methodology in order to apply for the renewal of the crediting period
Specify the monitoring period for which the request is valid (if applicable)	NA
Submitted by	Contact person name: Mr. Bhushan Trivedi Email ID: bhushan.trivedi@climatepartner.com
	Organization: INSEDA Engineers & Consultants Pvt. Ltd
	Project participant: Yes ☒ No ☐
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes ☐ No ☒ If yes; VVB name: VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☐ No ☒

2.1 | Description of the deviation:

The project activity involves installation of 15,203 household biogas plants (bio digesters) in Uttarakhand. Each bio digester is of 3m3 capacity. Initially plants from Kerala were considered under the project however due to devastating flood in Kerala in August 2018 the plants from Kerala were dropped from the project activity. All plants covered under the project activity are commissioned from 15 April 2017 onwards. The biogas plants are of deenbandhu model. The purpose of the project is to replace the commonly used inefficient wood fired mud stoves technology, with clean, sustainable and efficient biogas.

The project has crediting period from 15/04/2017— 31/03/2022.The first crediting period of the project activity is **01.11.2017 to 30.04.2019.** The second monitoring period of the project activity is from 31/04/2019 to 31/12/2020. The present ongoing monitoring period is from 1/01/2021 **to 31/03/2022.**

Since the first crediting period ends by 31/03/2022, and deviation is applied to fulfill the delayed submission of RCP meeting GS guidelines and change in the revised methodology requirement from AMS I.E, version 9 to AMS I.E, Version 13 as per the GOLD STANDARD PROCEDURES FOR THE RENEWAL OF A CREDITING PERIOD.

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

The deviation does not attract any kind of risk upon environmental integrity and all the SDG contributions are achieved in-line with the registered PDD.

2.1.2 | 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.*

NA

……

2.2 | 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.*

2.2.1 | Deviation assessment (to be completed by Project developer)

1- Deviation with respect to submission of RCP request with the end of first crediting period

The request for crediting period procedure for the project activity got delayed due to situations beyond control with respect to change in the mean communication /focal point related to project activity and organizational structure change. The internal management change delayed the request for crediting period notification to Gold standard and there is a delay in validation outcome from the auditor, that prevented us to communicate GS before December. The RCP procedure and initial submission of documents happened to Auditor during September 2022 and despite the submissions we are unable to proceed further with RCP request before the end of the year.

2- Deviation with respect to change in methodology version

The project activity involves installation of household biogas plants (bio digesters) in Uttarakhand. There is change in methodology AMS I.E, Version 9 to Switch from non-renewable biomass for thermal applications by the user Version 13.0 under Sectoral Scope 1, during Request for crediting period(RCP)

Conditions	Applicability
Project participants are able to show that non-renewable biomass has been used in the project region since 31 December 1989, using survey methods or referring to published literature, official reports or statistics.	Fuelwood has remained the principal component of rural domestic energy in India and in most developing countries. Most of the fuel wood has been reported to be derived from forests with some from trees growing on homesteads, farmlands, and common Lands outside forests. Because of the increasing population, the area under agriculture expanded and forests shrunk.
The methodology is applicable for technologies displacing use of non-renewable biomass by renewable energy	Project activity involves installation of bio digesters and biogas thus produced will displace the use of nonrenewable biomass to major extent. Therefore, condition is justified.
In the case that technologies using renewable biomass are used under the project activity, this methodology is applicable where all emissions related to processing of biomass are fully accounted for and biomass is sourced from biomass residues and/or a dedicated plantation of	This project activity is not registered under the CDM and any other mechanism. However, project activity is considered and accounted biomass as a source and biomass residues have not been collected and left for decay in open which

the CDM project activity, meeting the following conditions: (a) For projects that use biomass residues, prior to the implementation of the project activity, the biomass residues have not been collected and used but been left for decay and would, in the absence of the project activity, continue to be left for decay; and (b) For projects that use biomass residues from a production process (e.g. production of sugar or wood panel boards), the implementation of the project does not result in an increase of the processing capacity of raw input (e.g. sugar, rice, logs, etc.) or in other substantial changes (e.g. product change) in this process; and (c) The biomass used by the project facility is not stored for more than one year; and (d) In the case biomass from dedicated plantations are used, the applicability conditions of TOOL16 "Project and leakage emissions from biomass" are satisfied.	leads to methane emissions
For electric cookstoves with integrated renewable energy device or with grid connected renewable energy system employing net metering, project participants shall demonstrate that, on an annual basis, at least 80% of the electricity generated is consumed by the electric cook stoves (i.e. 20% or less of electricity is consumed by other loads connected)	Not Applicable
For electric cook stoves, in all cases under paragraph 2(d) (i.e., under reference of AMS I.E) of above where back-up diesel generators are used, this methodology is only applicable when no more than 1% of total electricity supply occurs from back up diesel generators on an annual basis.	Not Applicable
Under this methodology, emission reductions cannot be claimed only due to fuel-switch aspect and proposed project activities shall introduce new renewable energy-based technologies, i.e. technology switch is also involved.	Firewood was the main fuel used to suffice domestic needs. Usage of inefficient firewood leads to indoor pollution . A biodigester degrades and converts Biomass into usable gases. This ongoing treatment is achieved by bacteria into the tank that is built for

	collection of Biomass. The bacteria decompose the fecal matter anaerobically. The resulting biomass waste (manure) is treated well enough and this used for as a fertilizer.
Project participants shall describe in the PDD/PoA-DD the proposed method for distribution of project devices and how the double counting of emission reductions has been addressed, for example, using methods such as unique identifications of product and end-user locations (e.g. program logo), to prevent double counting of emission reductions from the project devices	Each of the bio-digesters shall be allocated a unique id against each end users. End user and project implementer shall have an agreement to avoid any double counting.
For project activities introducing bio-ethanol cook stoves, project participants or coordinating and managing entities shall demonstrate that the bioethanol cook stoves are designed, constructed and operated to the requirements (e.g. with regard to safety) of a relevant national or local standard or comparable literature. Latest guidelines issued by a relevant national authority or an international organization may also be used.	Not applicable
For project activities introducing bio-ethanol cook stoves, project participants or coordinating and managing entities shall demonstrate that the bioethanol cookstoves are designed, constructed and operated to the requirements (e.g. with regard to safety) of a relevant national or local standard or comparable literature. Latest guidelines issued by a relevant national authority or an international organisation may also be used.	Not applicable.

There are no major changes in the methodology when comparing with registered project activity and the following additional inclusions are envisaged in the new methodology AMS I.E, Version 13.

Additional Changes AMS I.E	Applicability
Introduce reference to "TOOL33: Default values for common parameters"; · Provides alternative procedures to determine the default values contained in	Diesel and kerosene is not used and hence this tool is not applicable during RCP

Ensure the consistency in definitions of market penetration metrics and thresholds.	Not applicable as additionality is demonstrated based on COMMUNITY SERVICES ACTIVITY REQUIREMENTS
Revision to allow the use of biogas flow meters to demonstrate operationally of the biogas system remotely.	The project activity does not require monitoring of the biogas quantity and hence it is not applicable
Revision to includes best practice examples for stove stacking.	Project does not involve stove stacking and hence not applicable
Introduce regional default fossil fuel emission factors and an alternative for the project participant to calculate the fossil fuel emission factor	Regional Emission factor from Table 2 (South Asia) is used for calculation of baseline emissions conservatively.

2.2.2 | 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.*

NA

2.3 | 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.*

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

<u>Deviation in Project design</u>

- The project activity has a deviation with respect to methodology application from registered PDD
- The methodology applicable during registration is AMS I.E, Version 9 and during RCP the methodology employed is AMS I.E, Version 13.0,

- The details of permanent changes for the present crediting period with reference to methodology applicability is mentioned in section 3.2

Deviation in Safeguarding principles

Proposed project is developed pursuant to the "gender sensitive" requirements outlined in the "Gold Standard Gender Equality Guidelines and Requirements". As required for the purpose of the PDD as specified in the guidance note to this section, the project participants present the assessment to questions included in step 1 to 3 in the respective guidelines and requirements.

1) Does the project reflect the key issues and requirements of gender-sensitive design and implementation as outlined in the gender policy? Explain

The project respects the key gender issues and requirements of gender-sensitive design and implementation of the project. SDG#5 is one of the impact areas of the project. The project is aimed to replace conventional wood fired mud stoves technology with biogas primarily for cooking. This will result in reducing use of firewood consumption or replacement of complete firewood usage at user place. Primarily in rural areas of India, cooking activity at household level is manahed by women. Therefore, women are more exposed to the indoor air pollution and the associated hazard. Women in rural areas in most cases are also responsible for taking care of their children specially infants who need mother's support most of the time are bound to accompany their mother in kitchen. This situation leads to enhanced exposure of the women and children to kitchen smoke and associated health consequences. Since the project aims to replace the polluting traditional cooking stoves with biogas cooking system, the primary beneficiary would be the women and children. Furthermore, the project is focused to the economically disadvantaged group of people, which also justifies the dimension of social inclusion in the project design.

2) Does the project align with existing country policies, strategies and best practices?

The Government of India reaffirms its commitment to work for the realization of constitutional guarantee of equality, social justice and non-discrimination on the basis of sex, caste, community, language and religion. Ministry of women & child development, govt. of India has taken various measures for gender equality/socio-economic development/empowerment of women1 . Out of these, the project positively contributes towards the national mission for empowerment of women

through improvement of health and attaining vision for empowerment of women under national policy for women 2016 (Women participation will be ensured in the efficient use and spreading the use of solar energy, biogas, smokeless hulah and other technological applications to have positive influence on their life styles and a long term impact on meeting sustainable development goals)

3) Does the project address the questions raised in the Gold Standard Safeguarding Principles & Requirements document?

All the mandatory social safeguards are followed as per Gold standard requirement and hence there is no deviation in the safeguarding principles.

4) SDG Assessments

The SDGs claimed are SDGs 3,7 and 14 as per the registered PDD and no new SDGs are claimed.

5) Emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project

The emission reductions from RCP period is higher due to revised F_{NRB} of the locality from 89% to 95% when compared with the registered PDD for the next crediting period. Hence the emission reductions increase from 60,739t CO2/Annum to 69,000 t CO2/Annum

Parameter	Description	Value	Unit
By	Quantity of woody biomass that is substituted or displaced in year y	72062.22	tonnes
H	Total consumption of woody biomass in the applicable area in the relevant period	36235945	tonnes
MAI forest, i	Mean Annual Increment of woody biomass growth per hectare in subtropical dry forest i of forest areas in the relevant period	0.50	Tonnes/hactare/year
MAI other, i	Mean Annual Increment of woody biomass growth per hectare in subtropical dry forest i of forest areas in the relevant period	0.50	Tonnes/hactare/year
RB	Quantity of renewable biomass that is available on a sustainable basis in the applicable area in the relevant period	1484150	tonnes
NRB	Quantity of non-renewable biomass consumed in the applicable area in the relevant period	34751795	tonnes
fNRB	Fraction of non-renewable biomass in the applicable area in the relevant period	0.9590	%

BEy	Baseline emissions in the year y	69431.37	tCO2e

The change is due to revised Tool 33 and parameter inclusions like P Forest and F others for FNRB calculations.

The quantity of renewable biomass available in the applicable area (RB) is estimated using the following equation:

$RB = \sum(MAIforest,i \times (Fforest,i - Pforest,i)) + \sum(MAIother,i \times (Fother,i - Pother,i))$ Equation (4)

Where: MAIforest,i = Mean Annual Increment of woody biomass growth per hectare in subcategory i of forest areas in the relevant period (tonnes/ha/yr)

MAIother,i = Mean Annual Increment of woody biomass growth per hectare in subcategory i of other land areas in the relevant period (tonnes/ha/yr)

Fforest,i = Extent of forest in sub-category i in the relevant period (ha)

Fother,i = Extent of other land in sub-category i in the relevant period (ha)

Pforest,i = Extent of non-accessible area (e.g. protected area where extraction of wood is prohibited, geographically remote area) within forest areas (in subcategory i) in the relevant period (ha)

Pother,i = Extent of non-accessible area (e.g. protected area where extraction of wood is prohibited, geographically remote area) within other land areas (in sub-category i) in the relevant period (ha) i = Sub-category i of forest areas and other land areas

The monitoring procedure, QA/QC are maintained same with respect to the registered PDD by the Project Developer and there is no potential risk relevant to project activity

2.3.2 | 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.*

NA

2.4 | Documents:

- Revised GS PDD
- Revised ER sheet

**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.)*

Version number	Release date	Description
5	11.04.2022	Additional information added: - 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