

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 21/04/2023

1.2 | Decision

The deviation request is **PARTIALLY APPROVED**.

The project developer shall refer to section 8.10.4 of POA requirement. Project developer can submit one real case VPA DD (from one of the countries included in the PoA boundary) at the time of PoA Design Certification and subsequent real case VPAs for each country can be included in the PoA at a later stage considering that the stated countries are homogenous on the grounds of additionality, baseline scenario, emission reductions and legislation.

The validating VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provides its opinion in the Validation Report.

SustainCert shall review both the PD's submission and the VVB's 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_394	
Date of decision	21/04/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	24/02/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	New Project
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	ECC_Multi-country Electric Clean Cooking Programme	
Date of listing	Not applicable: Request for Deviation refers to a new GS PoA	
GS Standard version applicable	N/A	
Date of transition to GS4GG (if applicable)	N/A	
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	<p>Batch 1 Countries: Somalia, Madagascar, DRC, Ghana, Togo, Benin, Burkina Faso, Guinea, Guinea-Bissau</p> <p>Batch 2 Countries: Tanzania, Kenya, Mozambique, Cote d'Ivoire</p> <p>Batch 3 Countries: Uganda, Rwanda, Senegal, Sierra Leone, Nigeria, Liberia</p> <p>Batch 4 Countries: Zambia</p> <p>Batch 5 Countries: Ethiopia</p> <p>Other countries may be added by undertaking a formal Design Change request.</p>	
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	Not applicable: Request for Deviation refers to a new GS PoA
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project
Title/subject of deviation	Country batching proposal for multi-country PoA
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Programme of Activity Requirements and Procedures: Version 2.0 of Publication Date 05.05.2022 with specific reference to Section 8.10 Registration of multi-country PoAs
Specify the monitoring period for which the request is valid (if applicable)	<div>Start date</div> <div>End date</div>
Submitted by	Contact person name: Nathan P.M. Gachugi
	Email ID: nathan.gachugi@burnmfg.com
	Organisation: ECOA Climate Capital
	Project participant: Yes <input checked="" type="checkbox"/> 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes; VVB name: VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No <input type="checkbox"/>

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](#).*

ECO Climate Capital (hereinafter referred to as "ECC"), a subsidiary of BURN Manufacturing Co., - the largest vertically integrated modern cookstove company in the world, is in the preparatory stages of a carbon offset program that would facilitate the distribution of metered electric cooking devices across Africa. This project is designed as a testament to the evolution of clean cooking solutions available for end users on the Continent.

The program will incorporate two distinct electric cooking appliances – namely Electric Pressure Cookers and Induction Cooking Units for domestic and small institutions (e.g. restaurants). The carbon offset program described herein is intended to be a Gold Standard Programme of Activities ("GS PoA") including multiple African host countries with individual VPAs thereunder representing individual host countries.

ECC therefore submits this deviation proposal in a bid to launch and design the PoA in manner that is most efficient and compliant with the Principles and Requirements of the Gold Standard for Global Goals ("GS4GG") under the Gold Standard methodology "Methodology for Metered & Measured Energy Cooking Devices" Version 1.2.

Section 8.10.1 of the GS Programme of Activity Requirements and Procedures provides that a multi-country Voluntary PoA shall provide a real-case VPA-DD for each country considered at the time of PoA validation. Exceptions to this rule may be requested on a case-by-case basis.

The CME, ECC, herewith submits this formal request to the Gold Standard with the requisite justification and supporting documentation evidencing the fact that targeted communities within host countries are homogeneous with respect to additionality, the baseline scenario applied, emission reductions and legislation. GS approval of this Request for Deviation will effectively authorize ECC to submit one VPA-DD (from one of the homogeneous countries within a batch) at the time of PoA Design Certification and subsequent VPAs for the other homogeneous countries within a batch can be included in the PoA at a later stage.

The CME will ensure that the Sustainable Development Goals Assessment and Safeguarding Principles Assessment will be carried out at VPA equivalent level.

At the time of submission of the PoA for Design Certification, the CME will ensure that least one real case VPA for one of the batches will be submitted. In the eventuality that not all of the countries of all the batches will be included at the time of PoA Design Certification, they may be included later on as **and when ECC will include a representative VPA from the batch.**

ECC seeks GS approval for the approach and the batches being accepted as presented below.

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

Here following, ECC will demonstrate that targeted households within the Countries are homogenous with respect to:

- a) Additionality
- b) Baseline Scenario
- c) Emissions Reductions
- d) Legislation

1) Additionality

All projects (VPAs) to be included under the PoA will be in compliance with item 1.1.3 of Annex B – positive list mentioned in the 'Community Services Activity Requirements'. All VPAs will be solely composed of isolated units (electric cooking metered devices) where each unit results in less than 1,800 MWh of thermal energy savings per year¹. In accordance with Principle 5, paragraph 4.1.9 of the 'Community Services Activity Requirements', each of the VPAs, regardless of the host country in which the project activity is being implemented, is deemed additional and therefore is not required to prove financial additionality at the time of Design Certification.

2) Baseline scenario

Comprehensive literature analysis has been conducted based on credible data sources regarding the proportion of woody biomass (firewood + charcoal) used for cooking in the respective countries as well as the proportion of improved cookstoves (ICS) using woody biomass.

The following steps have been conducted to compare the baseline scenario between the different countries:

- 1) Literature research regarding values for the proportion of charcoal and firewood used for cooking in the different countries.
- 2) Calculating the woody biomass used for cooking as the sum of proportions of charcoal and firewood for each of the countries.

¹ Section 1.1.3 of Annex B (positive list) indicates an energy savings threshold of 600 MWh which is equivalent to 1,800 MWh thermal energy savings per year.

- 3) Literature research on the electric cooking technology access rate in various countries. The latest available data for all the countries analyzed for baseline is used. Countries which do not have credible data points on electric cooking have been factored using a 0% access rate.
- 4) Literature research in regard to values for the proportion of improved cookstoves (ICS) using woody biomass used for cooking in the different countries.
- 5) Calculating the product of proportion of woody biomass (item 2) and proportion of ICS (item 3).
- 6) Adding Item 5 and Item 3 to arrive at the percentage of population using biomass with ICS and access to electric cooking.
- 7) Creating batches in 5% intervals:
 - a. Batch 1 consists of countries for which the calculated number as per item 4 is between 0 and 5%;
 - b. Batch 2 consists of countries for which the calculated number as per item 4 is bigger than 5% but $\leq 10\%$;
 - c. Batch 3 consists of countries for which the calculated number as per item 4 is bigger than 10% but $\leq 15\%$;
 - d. Batch 4 consists of countries for which the calculated number as per item 4 is bigger than 15% but $\leq 20\%$;

The 5% batch intervals have been chosen since considered as a reasonable range for this evaluation. Any difference within the 5% threshold has not been considered as material. The 5% criterion is also used in GS TPDDTEC methodology in 2 cases:

- a) Page 9: Classification of project technologies with similar design and performance characteristics under one single project scenario.
- b) Page 43: Emissions from production, transport, installation and delivery of clean water supply or treatment options are not considered as material when below 5% of the overall project emissions.

Baseline Batching methodology:

The batching resulted in groups of countries based on percentage of population using biomass with ICS + Access to Electric Cooking. The proposed batching groups countries into the various combinations of energy access to reflect the countries that are homogeneous in this respect. Countries may have relatively better energy access. The proposed batching groups the counties according to the different baseline combinations.

Please refer to "240223_ECC Multi-country PoA Deviation Request" excel file for the batch results which is mentioned below:

Batch 1 Countries: Somalia, Madagascar, DRC, Ghana, Togo, Benin, Burkina Faso, Guinea, Guinea-Bissau

Batch 2 Countries: Tanzania, Kenya, Mozambique, Cote d'Ivoire

Batch 3 Countries: Uganda, Rwanda, Senegal, Sierra Leone, Nigeria, Liberia

Batch 4 Countries: Zambia

Batch 5 Countries: Ethiopia

More countries can be added to the respective batches without changing the methodology of batching through a subsequent deviation request. The literature references for the values used are also mentioned in the excel file.

3) Emission reductions calculation:

Emission reductions of all VPAs will be calculated using the approach as defined in the GS methodology for metered & measured energy cooking devices version 1.2. All VPAs with similar technologies will follow the same calculation approach to ensure homogeneity.

4) Legislation

An analysis of cookstove related legislation has been conducted for each of the host countries. In none of the countries there is a mandatory law, policy or regulation which would oblige households to use energy efficient cookstoves. Even though many countries defined targets for the dissemination/promotion of improved cookstoves, those ones are not binding and not enforced. Often, efficient government structures and institutions are lacking, which prevent the targets from being implemented on the ground. In addition, financial, technological and capacity/knowledge barriers exist resulting in a failure of the intended cookstove mitigation measures.

Please find the detailed analysis for each country in the following as well as see all the data sources used and more information in the attached excel "240223_ECC Multi-country PoA Deviation Request" under the worksheets 'Legislation' and 'Sources').

Tanzania

The Nationally Determined Contribution (NDC) of Tanzania indicates as one of the intended contributions the expansion of use of natural gas for power production, cooking, etc. However, there is no mention in regard to any target related to the distribution/promotion of efficient cookstoves.

Uganda

The NDC of Uganda refers to the promotion and wider uptake of energy efficient cooking stoves or induction cookers as one of the mitigation ambitions. However, there is no mention regarding any target related to the distribution/promotion of efficient cookstoves. Further, the NDC mentions that the implementation of the mitigation measure is contingent upon receipt of sufficient international support, provided in the form of finance, technology and capacity building.

Rwanda

The NDC of Rwanda refers to the intention to increase the diffusion of improved cook stoves and reach 100% of all households in needs 2030. This is not a binding law/policy, but a target which is probably hardly to be accomplished due to financial, technological, and other barriers.

Kenya

Kenya's national energy policy (National Energy Policy, 2018) mentions as one of the prioritized actions in the energy sector the development and distribution of 4 million improved biomass stoves by 2022. Kenya's National Climate Change Action Plan 2018-2022 (National Climate Change Action Plan, 2018) provides some more details related to the development and distribution of those improved biomass cookstoves. As per the National Climate Change Action Plan it becomes clear that the distribution of 4 million improved biomass stoves is an objective and a proposed priority mitigation action, however the distribution and use of improved biomass cookstoves is not enforced by any government law, policy or regulation, hence there is no obligation for households to use improved cookstoves. Hence, though a government objective

has been defined, it is not guaranteed whether this objective will be achieved in reality and if so, to what extent. The NDC of Kenya does not mention any specific objectives in regard to improved cookstoves (UNFCCC).

Ethiopia

According to the 'Financing Climate Futures' (2019), Ethiopia clean cooking policy focuses on improved biomass cookstove technology with the goal of having distributed an additional 11.45 million improved cookstoves during the 2016-2020 period. However, the same document mentions several barriers for such cookstove programmes in Ethiopia, like the high dependence on public subsidies and incentives to decrease the cost as well as the lack of availability of cookstoves. Further, a review on policies and strategies in Ethiopia noted a lack of governmental capacity, despite the government's ambitious goals. SNV Ethiopia, 2018 mentions that there is no mandated, champion government institution to lead the cooking sector, casting doubt on the capability of the country to meet its goal. There is poor coordination and duplication of efforts in implementing policies related to ICS (SNV Ethiopia, 2018). The NDC of Ethiopia mentions that one of the priority initiatives under the Climate Resilient Green Economy Strategy (CRGE) is the use of more efficient stoves, however, no quantitative targets are indicated.

Somalia

The NDC mentions as potential remedial actions to overcome the deforestation the introduction and advocating the use of more efficient kilns for charcoal making and efficient stoves for local use. However, the NDC does not mention any specific targets for the implementation of improved cookstoves. The National Communication to UNFCCC (2018) indicates that the regulatory framework for most of Somalia is poorly developed, although the country has signed a number of important international conventions relating to natural resource use and management.

Zambia

The NDC of Republic of Zambia mentions the involvement of improved biomass devices as part of the Zambia's Programs Contribution to its National Mitigation Goal, however does not mention any specific objectives in regard to improved cookstoves. The National

Energy Policy (2019) does not mention any national targets for the implementation of improved cookstoves either.

Mozambique

According to the BEST report (2012), the government and its partners have been promoting ICS for a while but hasn't taken any initiatives to scale up the operations. No regulation on ICS standards and labelling exists. Mozambique first NDC does not have any mention on improved cookstoves.

Madagascar

Though the government of Madagascar has defined an ambitious target for the adoption of ICS (70% by 2030), there are several barriers and challenges to achieve these targets, amongst others lack customer awareness, limited capacity due to lack of financing, consumer affordability challenges, and a lack of data. Hence, it cannot be expected that the defined targets will be realized as envisaged (Energizing Finance 2019).

Democratic Republic of Congo

As per the UNDP report 'Sustainable Energy for all towards the 2030 horizon' (UNDP 2013), one of the objectives as part of the 'Program to improve energy efficiency through the diffusion of improved stoves' is the government's support for production, and commercialization of improved cookstoves, sensitization of the population in DRC for the use of improved cookstoves and develop a favorable legal and tax framework for improved cookstoves. However, the distribution and use of improved biomass cookstoves is not enforced by any government law, policy or regulation, hence there is no obligation for households to use improved cookstoves. Hence, though a government objective has been defined to foster the use of improved cookstoves, it is not guaranteed whether this objective will be achieved in reality and if so, to what extent. The NDC of DRC does not mention any specific objectives in regard to improved cookstoves.

Ghana

Though Ghana's NDC mentions as one of the policy actions the scale up access and adoption of 2 million efficient cook stoves up to 2030 (NDC Ghana), there is a lack of cohesive policy, strategy and coordination framework for the cookstoves sector, inadequate regulation in the cooking sector and lack of incentives to promote the cooking sector, such as tax exemptions or regulation of raw materials (UNDP Nama study, 2016). Hence, it is not guaranteed whether objective as defined in the NAMA will be achieved in reality and if so, to what extent. Besides there is no obligation for households to use improved cookstoves.

Senegal

The document 'Energy policy of the Republic of Senegal' (2018) mentions that the objective of the government in the sub-sector is to provide sustainable supply of urban and rural households with cooking energy, while ensuring the preservation of forest resources. However, no specific targets for the promotion/dissemination of improved cookstoves are mentioned. No NDC has been submitted to UNFCCC.

Cote d'Ivoire

The NDC mentions as one planned mitigation action the promotion of improved cookstoves, however no specific targets are mentioned.

Sierra Leone

The NDC of Sierra Leone refers to the expansion of clean energy utilization like biomass stoves, however, does not mention any specific target. UNDP further describes the capacities to translate the plans and strategies defined in the National Energy Plan and National Energy Strategy into pragmatic and business solutions as weak (UNDP).

Nigeria

The national renewable energy and energy efficiency policy (2015) mentions as a key strategy the encouragement of the production and use of improved and more-efficient cooking stoves. However, the policy does not mention any quantitative target. The NDC of Nigeria indicates that efficient cookstoves are one way to reduce fuel demand, however again no specific targets or objectives are outlined.

Togo

The NDC of Togo has only one vague mention that Togo can promote the roll-out of energy-efficient cookstoves, however no specific target is mentioned. UNEP research (Togo Air Quality Policies, 2015) confirms that no programs or policies regarding promotion of clean/efficient cookstoves exist. The Poor People's Energy Outlook (2019) refers to a poor national activity on clean cooking.

Benin

The NDC mentions the promotion of clean cookstoves (140,000 ICS) and focuses on LPG penetration (275,000 households). However, the indicated numbers are only envisaged figures, hence it is expected that those objectives will not be achieved in reality unless there is foreign investment in form of carbon credit projects.

Burkina Faso

The NDC mentions the production and distribution of improved cook stoves in urban and semi-urban areas as one of the adaptation actions. It mentions 540,000 cook stoves produced and distributed, at least 50% in urban and semiurban areas. However, the distribution and use of improved biomass cookstoves is not enforced by any government law, policy, or regulation, hence there is no obligation for households to use improved cookstoves. Hence, though a government objective has been defined to foster the use of improved cookstoves, it is not guaranteed whether this objective will be achieved in reality and if so, to what extent.

Guinea

The NDC mentions past activities in regard to dissemination of improved cookstoves, and that 'another programme aims to develop efficient wood-fired stoves for rural areas'. However, no targets for the dissemination of improved cookstoves for the future are indicated.

Guinea-Bissau

There is no single mention about improved/efficient cookstoves in the NDC.

Liberia

The NDC mentions as planned mitigation actions amongst others the production and distribution for 280,543 energy saving cook stoves that use fuel wood and 308,004 energy saving cookstoves that use charcoal by 2030. However, the distribution and use of improved biomass cookstoves is planned and not enforced by any government law, policy or regulation, hence there is no obligation for households to use improved cookstoves. Hence, though a mitigation action has been planned to foster the use of improved cookstoves, it is not guaranteed whether this objective will be achieved in reality and if so, to what extent.

The data sources used and more information in the attached excel file "240223_ECC Multi-country PoA Deviation Request".

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.*

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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):

As evidenced in Section 3.1.1 (Deviation Detail), all material representation provided in this deviation request are buttressed on the GS PoA Principles and Requirements. All reference files and supporting documents are referenced in the attached worksheet: "240223_ECC Multi-country PoA Deviation Request".

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.*

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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):

There is no impact on the project design, safeguarding principles, SDG assessment, Emission reductions, monitoring frequency, data quality, potential risk or any other aspects of the project due to this deviation. Each VPA submitted for design certification within the PoA will be following the relevant Gold Standard eligibility criteria. The PoA will abide by the Programme of Activity requirements v 2.0 and other Gold Standard requirements.

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.*

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3.4 | Documents:

**Guidance* List of documents provided
"240223_ECC Multi-country PoA Deviation Request".*

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 <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption