

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 12/06/2023

1.2 | Decision

The deviation request is approved for the 2nd VPA in Tolum.

In the future, and prior to including any more VPAs, the project developer shall update the PoA to apply the latest methodology applicable under GS for their project type, and future VPAs shall be submitted applying the new methodology.

The project developer 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 conditions and provides its opinion in the Verification Report.

SustainCert shall review both the project developer'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_411	
Date of decision	12/06/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	27/04/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS1075
	<input checked="" type="checkbox"/> VPA	ID – GS12011
Project/PoA/VPA title	PoA title: Solar cooking in Chad (PoA) VPA: Solar Cooking in Chad, Touloum (VPA2)	
Date of listing	18/11/2022 (tbc)	
GS Standard version applicable	GS4GG	
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	The Republic of Chad	
Scale of the project/PoA/VPA	<input checked="" type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	N/A	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New (VPA) <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project (PoA)	
Title/subject of deviation	Continued use of the SMEC v.1.1 for solar cookstoves project	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Section 1. "This methodology is applicable to the micro-scale programmes and micro-scale activities introducing new wood fired cookstoves that reduce use of non-renewable fire wood"	

Specify the monitoring period for which the request is valid (if applicable)	N/A
Submitted by	Contact person name: Olivier Levallois
	Email ID: o.levallois@hamerkop.co
	Organisation: Hamerkop Climate Impacts Ltd
	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).	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 checked="" 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](#).*

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

On 5 September 2013, the carbon consultant in charge of supporting the certification of a new solar cookstoves project in the refugee camps in Chad sent an email to the Gold Standard to request the confirmation that the GS Simplified Methodology for Efficient Cookstoves v1 (Feb. 2013) was the most suitable methodology for the carbon accounting and monitoring of the new project (described non-ambiguously as “*microscale GS solar cooker project in refugee camps in Chad*” on the email).

On the same day, Sriskandh Subramanian, then Head of Standard Development, replied non-ambiguously on behalf of the Gold Standard that “*Yes, this methodology can be applied to solar cookstoves by taking 100% project stove efficiency.*”.

On 19 June 2015, during the last round of the PoA's internal validation review, it was confirmed by the carbon consultant that *"the cookers run on 100% solar energy, it is not considered necessary to apply an efficiency loss factor. The approach to applying the 100% efficiency figure for solar cooking was confirmed by Sriskandh Subramanian on 05/09/2013"* and the comment was closed, approved by the Gold Standard. The internal validation was closed and the PoA (together with VPA-1) registered on 8 January 2016.

On 12 June 2020, the PoA passed the transition to the GS4GG. The question of the suitability of the methodology was not raised again and the project was successfully transitioned.

In August 2020, the PoA started the renewal of its crediting period. The relevance of the use of a 100% energy efficiency with a solar stove was briefly raised and closed.

On 7 October 2020, the crediting period process was closed, approved, with 2 FAR, none of them related to the applicability of the methodology or the thermal efficiency used for the solar stove.


On 18 November 2022, the inclusion of a 2nd VPA (GS 12011 - Solar Cooking in Chad, Touloum) was submitted to SustainCert for inclusion (Design Certification Review). The internal validation findings were shared by SustainCert on **16 January 2023**. On **31 January 2023**, after 2.5 months of absolutely avoidable delays, SustainCert **informed the PD the project was actually not qualified for fast-track inclusion** (even though 2.5 months had past, and the internal validation started). On **10 February 2023**, SustainCert requested the PD actually undergo a Preliminary Review. After another 2 months of slow and poor communication, SustainCert suddenly decided that there was another issue and that the **methodology was suddenly no longer applicable for the project**, without explanation of the reason the methodology adopted at the PoA level was no longer applicable.

Upon a request for a clarification around a statement that did not make sense in light of the project history, SustainCert had informed us of the email from the Gold Standard (see below) confirming the need to formulate the present request.






Re: Clarification request on the applicability of the meth criteria and a registered MS PoA

@goldstandard.org>

To: 
Cc:  Nayan Deka, 

 Follow up. Start by 03 April 2023. Due by 03 April 2023.

This message is part of a tracked conversation. Click here to find all related messages or to open the original flagged message.

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Mon 03-04-2023 01:27

Hi 

The simplified methodology 1.1 specifies that it is only applicable to wood-fired stoves and, therefore, is not suitable for solar cookstoves.

When making a deviation decision, it is crucial to have a clear understanding of its context, rationale, and applicability. Unfortunately, the deviation decision does not provide enough information to make an informed decision on whether it can be used beyond the approved project. Therefore, I agree with your evaluation and recommend that the deviation decision should not be used as the basis for interpreting its applicability beyond the approved project.

However, note that microscale projects are allowed to follow new simplified, conservative approaches as per section 6 of the "Baseline, Project Scenario & Monitoring" document (<https://globalgoals.goldstandard.org/108-par-microscale-project-requirements/>). This includes using default factors and considering suppressed demand elements to streamline the evaluation of Sustainable Development Goals (SDGs). Nevertheless, the proposed methodological approach should be conservative enough, and convincing arguments must support its use.

If the project developer wishes to apply the same methodological approach, it is essential to seek a new deviation that clearly outlines the context, rationale, and applicability of the proposed approach. Additionally, the developer should state that the approach is an adapted version based on the MS simplified cookstove methodology. Finally, the developer should discuss the sustainability of the technology, as there are new requirements in the latest simplified cookstove methodology that may be relevant to the project technology.

I hope this information helps you make an informed decision. If you have any further questions, please let me know.

The email states that "... the deviation decision should not be used as the basis for interpreting its applicability beyond the approved project". This is referring to the deviation dating back 2013, BUT the deviation was not for a project, it was for a PoA, as accepted during the internal validation, the transition to the GS4GG and the CP renewal process. All the supporting and convincing arguments were provided multiple times and approved.

By the nature of the response formulated by the Gold Standard, it appears clearly that the replier was not provided with the full project context, which should have been done by SustainCert.

This is not so much a deviation request for the same PoA to keep using the same methodology, but the clarification requested by the Gold Standard, that **the new VPA, should be allowed to keep using that methodology without any further deviation request.**

The request formulated back in 2013 was pretty specific at defining what the request was for "GS solar cooker project in refugee camps in Chad". In addition, both of you (GS and SC) had several opportunities to raise this issue in the past, and you never did, notably during the transition to the GS4GG, but also more recently and relevantly during the renewable of the crediting period. The methodology is applied at the PoA level and the PoA description is also very clear about the scope of the programme and the projects. The decision to allow the PD to use this methodology across the PoA was straight forward and without ambiguity.

The proposed VPA-02 is the exact replicate of VPA-01: same location (broader area), same technology, same context, same stakeholders, same everything... only a different refugee camp a few km away.

This project is 100% funded by the sale of carbon credits, funded by a non-for-profit, and credits are retailed at a premium, to cover all the necessary costs. Everything has been funded in this new camp since 2022, and the project needs to move on with the inclusion. Not allowing this project to keep using this methodology, will simply and truly ends the project since it can no longer sustain with a single VPA. FairClimateFund will disinvest and the project will be left to decay on its own. This is simply stating a fact.

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):

The requirements will all be met as articulated several times in the PoA-DD and the VPA-01-DD and as approved during the multiples processes. Impact on:

- **Accuracy:** there is nothing more accurate than emissions and energy consumption calculation when it comes to a solar stove: it does not consume firewood at all, nor any energy that emission GHG emissions. The monitoring is aligned with the methodology and nothing in the requested deviation impact emission reduction calculation. This obviously does not mean that firewood

stove(s) used aside are not accounted for, it is and it will. Hence, this approach could not be more accurate and conservative.

- **Completeness:** Nothing in the request impact completeness.
- **Conservativeness:** solar stoves do not waste energy as long as solar energy not used cannot be considered wasted, accordingly, a 100% energy efficiency for a solar stove is like saying all the energy is used for cooking. Not considering 100% energy efficiency would mean that when going from 10% to e.g., 80% efficiency, firewood is reduced by 8, when the firewood is reduced by 100% when using solar stoves, since no firewood is used. This obviously does not mean that firewood stove(s) used aside are not accounted for, it is and it will. Hence, this approach could not be more accurate and conservative.

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):

The deviation request will have absolutely no impact on safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. If this request was not accepted, the project will have to end, and this will have an impact on SDG.

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 (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.)*

- Crediting period renewal review/feedback form: gs1075_CP
Renewal_GS1075_GS3445-Final round@07102020
- PoA internal validation review/feedback form: GS1075_Internal Validation
feedback_round III_190615
- Email from Gold Standard allowing PD to use the methodology: Re Simplified
cookstove meth solar cookers

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 Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption