



# 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 – dd/mm/yyyy

31/05/2023

#### 1.2 | Decision

The request to postpone the FAR#2 to next monitoring period is **approved** considering that the FAR was raised after the surveys were conducted (in 2021 and 2022).

However, PD shall note that this is not a permanent approval and has to comply with the requirement set in the FAR raised during the 3<sup>rd</sup> monitoring period (2018-2020) of its first crediting period (2014-2020).

Additionally, if the usage rate values achieved during the next monitoring period is materially less than the value used for the current MP, the PD must retroactively adjust the ERs (for the next monitoring) based on the difference in the usage rates achieved.

In addition to the above-mentioned conditions/requirements, PD must also 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, the information and statements presented by the PD in this deviation request 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.

The verifying VVB during next MP shall ensure that the usage rate is conservatively applied, and the emission reduction is retroactively adjusted in the next Monitoring Period, as applicable.

**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_432	
Date of decision	31/05/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	03.05.2023	
Project/PoA/VPA	Project	ID – GS2457
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Improved Jikos – Better Living for Rural Population	
Date of listing		
GS Standard version applicable	Technologies and Practices to Displace Decentralized Thermal Energy Consumption (vers.3.1, August 2017)	
Date of transition to GS4GG (if applicable)	04/01/2022 (with Crediting Period Renewal)	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	n/a	
Date of design certification/inclusion (if applicable)	19/05/2015 Renewal: 04/01/2022	
Location of project/PoA/VPA	Kenya	
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/363">https://registry.goldstandard.org/projects/details/363</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	Transition to apply FAR#2 on sample's average age	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Technologies and Practices to Displace Decentralized Thermal Energy Consumption, Version 3.1 – Published August 2017, point 3.1.C.b (p.31, footnote 33 ) “To ensure conservativeness, participants in a usage survey with technologies in the first year of use (age0-1) must have technologies that have been in use on average longer than 0.5 years. [...]”.
Specify the monitoring period for which the request is valid (if applicable)	Start date: 01.01.2021 End date : 31.12.2022
Submitted by	Contact person name: Leon Jander Email ID: jander@fastenaktion.ch Organisation: Fastenaktion 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 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](#).*

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

In January 2023, the project GS2457 has successfully concluded the 3<sup>rd</sup> monitoring period (2018-2020) of its first crediting period (2014-2020). The project is currently in its second crediting period (2021-2027). In line with methodological requirements that the first verification needs to take place within the first two years of any crediting period, we have initiated the verification of the monitoring period 2021 in early 2022, hence, before the conclusion of the last verification exercise (which only ended in January 2023).

The verification exercise of the 3<sup>rd</sup> monitoring period (2018-2020) of its first crediting period (2014-2020) ended with an approved performance review including several FAR. However, this has led to an impasse. Since this verification exercise was only concluded in January 2023, we are unable to apply the FAR #2 to the years 2021 and 2022. Specifically, to the monitoring and usage surveys carried out in 2021 and 2022. We seek therefore to deviate from this specific FAR for the years 2021 and 2022, which refers to the TPDDTEC, point 3.1.C.b (p.31, footnote 33).

Thus, this deviation request concerns the FAR#2 of the latest approved performance review (approved on the 3<sup>rd</sup> of January 2023)<sup>1</sup>.

*"The PD shall ensure the minimum total sample size for Usage Survey is 100, with at least 30 samples for project technologies of each age being credited. The usage survey monitoring shall also be compliance with the applied methodology TPDDTEC: "to ensure conservativeness, participants in a usage survey with technologies in the first year of use (age 0-must have technologies that have been in use on average longer than 0.5 years. For technologies in the second year of use (age 1-2), the usage survey must be conducted with technologies that have been in use on average at least 1.5 years, and so on"."*

However, the usage & monitoring surveys 2021 and 2022 include age groups that are below x.5 year average (see GS2457 monitoring & usage survey report 2021 & 2022). Find the details summarized below:

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<sup>1</sup> See annex of the approved performance review "\_GS2457\_GS4GG MP3 Performance Review\_Final 2023-01-03", p.2

Age group	Average age survey 2021	Average age survey 2022
0-1	0.61	0.65
1-2	1.39	1.47
2-3	2.31	2.37
3-4	3.37	3.31
4-5	4.38	4.24
5-6	5.25	5.39
6-7	6.44	6.26
7-8	7.43	7.38
8-9	8.13*	8.53
9-10		9.12*

\*Last age groups are always under .5, because the first stoves were constructed in September and the monitoring survey occurs every year in November.

With this deviation request we seek deviation from the methodological requirement to have a minimum average age of at least x.5 years per age group for the years 2020 and 2021 only.

As the request concerns past years, it is unfortunately not possible to retroactively apply the FAR#2. We will explain in the next chapter why this situation for the usage surveys 2021 and 2022 exists.

3.1.1 | 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.*



### 3.2.0 | Deviation assessment (to be completed by Project developer):

We justify this request considering that:

- In September 2015, when we drew the sample for the first monitoring & usage survey. Aware of the mentioned problem that it is hard to impossible to randomly sample age groups with an average age above x.5, we requested clarification from Gold Standard on how to proceed. This clarification at the time was equivalent to what is now known as "deviation request", which at that time was not yet formalized. The Gold Standard clarification provided, laid out that if the sample did not reach x.5 on average, we have nonetheless to sample within this age group: "[...] *It means for 1-2 years, the sample stoves can be selected from the stove group with average age 1.43 years [...]*"(see "Question regarding the sampling for the monitoring survey GS.pdf"). At the same time, we continued following scrupulously the requirements of random selection of the sample and the minimum number of stoves per age group in the sample, as highlighted in the same clarification. Following this clarification guideline, we successfully conducted two Performance Reviews. This approach did not raise any questions neither by the Validation and Verification Body nor by Gold Standard. Thus, we had no reason to reconsider our approach, which, as described, was approved.
- It was for the first time during the 3<sup>rd</sup> Performance Review of the monitoring period 2018-2020, that our approach raised questions by the SustainCERT technical reviewer, finally accepted and brought forward in FAR #2, as per final performance review document issued in January 2023.
- It is unfortunately not possible to achieve the x.5 requirement in adjusting the past samples by for example introducing cut-off dates as suggested by the SustainCert technical reviewer, as this would **lead to incompatibility with the requirement of a minimum sample size of 30 households per age group.**
- We understand that the practice of GoldStandard/SustainCERT may have evolved over time and that the clarification made by GoldStandard in 2015 would not be issued anymore now. We understand therefore that we have to adjust our approach as of now following new guidance on how to solve this methodological requirement. For example, by introducing cut-off dates for each age group. This will be taken into consideration in the 2023 usage & monitoring survey sampling.

- Aware of this problem of not being able to retroactively change the samples, we already suggested this approach in the 3<sup>rd</sup> performance review (*GS2457\_GS4GG MP3 Performance Review\_Final 2023-01-03, p. 15*)

In the sense described above, we consider that the project GS2457 could always assume that it was in compliance with the requirements.

Regarding conservativeness, one could think that older stoves have lower usage rates and that therefore the x.5 average age supports conservativeness in the usage rate. However, looking at the usage survey 2021 and 2022, this is not the case.

First, it must be considered that in any case, every age group with a usage rate above 90% is capped to 90%, thus levelling out any differences above.

Second, according to the above argument, we would expect decreasing usage rates across age groups. However, this is not what we observe in project GS2457. Find below the tables.

Age group	Usage rate 2022 in %	Usage rate 2021 in %
0-1	97.14	94.59
1-2	91.89	94.14
2-3	83.33	100
3-4	96.97	85.71
4-5	100	97.14
5-6	85	94.87
6-7	88.24	97.06
7-8	88.57	100
8-9	82.35	

We conclude that usage patterns don't follow stove age but are rather linked to the engagement activities carried out by the project team throughout the year sensitizing stove owners how to correctly use their stoves.

From this we conclude that the above formulated deviation request is not likely to affect conservativeness for the usage surveys 2021 and 2022.

What is more, we would like to emphasize that our project has developed and improved over the years through every contact with our Validation and Verification bodies, SustainCERT, Gold Standard, project evaluators and our active participation in a network of European non-governmental organization working with community-based carbon emission reduction projects.

We are committed to maintaining our high-quality standards and improve further and take needed measures to meet the requirement in 2023 and forward.

3.2.1 | 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.*

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

#### Impact of the deviation on project design:

This deviation does not impact the implementation, operation or monitoring of the activities. Thus, the environmental integrity and the contribution to the SDGs are not changed.

#### Impact of the deviation on project design:

The deviation request is temporary and does not impact.

#### Impact of the deviation on safeguarding principles assessment:

The deviation request does not impact the safeguarding principles, as it's about the sampling for the usage surveys of 2021-2022.

### Impact of the deviation on emissions reduction

As described above, in our view, the deviation request does not hamper the principle of conservativeness. Indeed, usage patterns don't follow stove age but are rather linked to the engagement activities carried out by the project team throughout the year sensitizing stove owners how to correctly use their stoves. Thus, we conclude that the deviation request also does not affect emissions reduction.

#### 3.3.1 | 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.)*

Version number	Release date	Description
1	27.09.2015	Email exchange 2015 with Gold Standard: <i>Question regarding the sampling for the monitoring survey GS.pdf</i>
1	03.01.23	Final Document Performance Review 3 GS2457: <i>_GS2457_GS4GG MP3 Performance Review_Final 2023-01-03.pdf</i>
1	December 2021	Monitoring & usage survey report 2021: <i>GS2457_Monitoring_Usage_Survey_2021_Report_220323_Report_v1_(confidential).docx</i>
1	December 2022	Monitoring & usage survey report 2022: <i>GS2457_Monitoring_Usage_Survey_Report_2022_Report_v1_(confidential).docx</i>

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