

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 30/06/2023

1.2 | Decision

The deviation request is not approved.

The non-renewable fuel stated in this deviation cannot be considered as fossil fuel under this methodology.

The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the PDD.

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.

Certification body shall review both the project developer'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

Methodology ASM-I.E version 10 is using the term “fossil fuel” when it might be understood to mean “non-renewable fuel”. The methodology is made for projects in which non-renewable fuel is used in the baseline scenario, but the project is still referring to the use of fossil fuel in the baseline scenario.

Our PoA and the projects under our PoA provide solutions to replace the use of non-renewable woody biomass in the baseline scenario. We need a deviation approval for such solutions to be applicable under methodology ASM-I.E version 12 and that the value of $EF_{projected_fossil\ fuel}$ might then be calculated based on the emission factors of the actual fuel used in the baseline scenario.

Our PoA and our projects under the PoA is transferred from CDM. CDM Carbon Credits have been issued from 5 consecutive monitoring periods prior to end of 2020. It is hence understood that CDM approve the methodology AMS-I-E to be applicable for projects in which the use of non-renewable woody biomass is used in the baseline scenario.

I would like to point to a similar Gold Standard methodology “Reduced Emission from Cooking and Heating”

<https://globalgoals.goldstandard.org/407-ee-ics-technologies-and-practices-to-displace-decentralized-thermal-energy-tpddtec-consumption/>

In this Gold Standard methodology the Baseline EF fuel is calculated in the same way and using the same reference value as in methodology AMS-I.E version 12, but it is specifying that the EF fuel might also be wood or charcoal.

Deviation Reference Number	DEV_434	
Date of decision	30/06/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	16/04/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input checked="" type="checkbox"/> VPA	ID – GS11718 ID – GS11717 ID – GS11716 ID – GS11715 ID – GS11714 ID – GS11713 ID – GS11693 ID – GS11692 ID – GS11691 ID – GS11690 ID – GS11689 ID – GS11688 ID – GS11687
Project/PoA/VPA title	PoA Title: PoA for the Reduction of emission non-renewable fuel from cooking at household level	
Date of listing	ID – GS11718 – 14/06/2022 ID – GS11717 – 14/06/2022 ID – GS11716 – 14/06/2022 ID – GS11715 – 14/06/2022 ID – GS11714 – 14/06/2022 ID – GS11713 – 14/06/2022 ID – GS11693 – 30/05/2022 ID – GS11692 – 30/05/2022 ID – GS11691 – 30/05/2022 ID – GS11690 – 30/05/2022 ID – GS11689 – 30/05/2022 ID – GS11688 – 30/05/2022 ID – GS11687 – 29/05/2022	
GS Standard version applicable		
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)		

<p>Location of project/PoA/VPA</p>	<p>ID – GS11718 - Madagascar ID – GS11717 – Madagascar ID – GS11716 - Madagascar ID – GS11715 - Madagascar ID – GS11714 - Madagascar ID – GS11713 - Nigeria ID – GS11693 - Kenya ID – GS11692 - Kenya ID – GS11691 - Kenya ID – GS11690 - Kenya ID – GS11689 - Kenya ID – GS11688 - Kenya ID – GS11687 - Malawi</p>
<p>Scale of the project/PoA/VPA</p>	<p><input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale</p>

<p>Gold Standard Impact Registry link of the project/PoA/VPA</p>	<p>ID – GS11718 - https://platform.sustain-cert.com/certification/projects/2965</p> <p>ID – GS11717 - https://platform.sustain-cert.com/certification/projects/2964</p> <p>ID – GS11716 - https://platform.sustain-cert.com/certification/projects/2963</p> <p>ID – GS11715 - https://platform.sustain-cert.com/certification/projects/2962</p> <p>ID – GS11714 - https://platform.sustain-cert.com/certification/projects/2961</p> <p>ID – GS11713 - https://platform.sustain-cert.com/certification/projects/2960</p> <p>ID – GS11693 - https://platform.sustain-cert.com/certification/projects/2940</p> <p>ID – GS11692 - https://platform.sustain-cert.com/certification/projects/2939</p> <p>ID – GS11691 - https://platform.sustain-cert.com/certification/projects/2939</p> <p>ID – GS11690 - https://platform.sustain-cert.com/certification/projects/2938</p> <p>ID – GS11689 - https://platform.sustain-cert.com/certification/projects/2936</p> <p>ID – GS11688 - https://platform.sustain-cert.com/certification/projects/2935</p> <p>ID – GS11687 - https://platform.sustain-cert.com/certification/projects/2934</p>
--	---

Status of the project/PoA/VPA	<input type="checkbox"/> New <input checked="" type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project
Title/subject of deviation	Approval the use of non-renewable fuel as fossil fuel

<p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p>	<p>Methodologies refer to use of Fossil fuel in the baseline scenario. The fuel in the baseline scenario is however wood and charcoal, which is none-renewable fuel, but not fossil fuel. The methodology is clearly developed for projects that use wood and charcoal in the baseline and it is understood that the term fossil fuel often is use as a term that is understood to include all non-renewable forms of fuel including the portion of wood and charcoal that is considered none-renewable.</p> <p><u>See methodology AMS-I.E version 12,</u> paragraph 22 in which it is stated that</p> <p>“Baseline emissions</p> <p>It is assumed that in the absence of the project activity, the baseline scenario would be the use of fossil fuels for meeting similar thermal energy needs”.</p> <p>This reference to the use of fossil fuel in the baseline scenario is however in direct contradiction to:</p> <ul style="list-style-type: none"> • Paragraph 1, State that “the typical project generates thermal energy by introduction renewable energy technologies for end users that displaces the use of non-renewable biomass”. • Paragraph 2. “This methodology comprises of activities to displace the use of non-renewable biomass.” • Paragraph 3. “Project participants⁴ 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. <p>It is understood that the methodology is applicable for projects in which use non-renewable woody biomass in the baseline scenario, even though paragraph 22 refer to the use of fossil fuel, even though non-renewable biomass might not be considered a fossil fuel.</p> <p>If so, the value $EF_{projected_fossil\ fuel}$ may be not only apply for fossil fuel, but for all fuel used in the baseline scenario, including non-renewable woody biomass.</p> <p><u>Methodology AMS-III.AV version 8</u></p>
--	---

	<p>This methodology specify have a similar issue as Methodology AMS-I.E version 12. But in methodology ASM-III.AV version 5 it is specified that:</p> <ul style="list-style-type: none"> • Paragraf 1 “Project activities that introduce low GHG emitting water purification systems to provide safe drinking water and displace water boiling using non-renewable biomass or fossil fuels. • Paragraph 13 “It is assumed that fossil fuel and/or non-renewable biomass (NRB).” • Paragraph 15. “$EF_{projected_fossil\ fuel}$ = Emission factor of the fuel type i substituted (t CO₂/TJ)” <p>Paragraph 27, table “$EF_{projected_fossil\ fuel}$” does however state under “value applied” that “If the fuel displaced is NRB, this parameter can be sourced from approved methodology AMS-I.E. (i.e. Table 2 in version 10.0 of AMS-I.E., if there are updates use the information from the latest version of AMS-I.E.); Table 2 in version 10,0 of AMS-I.E is the same as table 2 in AMS-I.E version 12, and refer to fossil fuel only (and not non-renewable woody biomass).</p>
Specify the monitoring period for which the request is valid (if applicable)	<div>Start date</div> <div>End date</div>
Submitted by	<div>Contact person name:</div> <div>Email ID: hn@greendevlopment.no</div> <div>Organisation: Green Development AS</div> <div>Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></div>
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	<div>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></div> <div>If yes; VVB name:</div> <div>VVB Staff name(s):</div>
Any previous deviations approved for the same project activity/PoA/VPA(s)?	<div>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></div>

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):

Green Development AS is submitting this deviation request for projects under “PoA for the Reduction of emission non-renewable fuel from cooking at household level”, with GS ID GS11574 to be allowed to consider methodology AMS-I.E version 12 to be applicable for projects which use non-renewable woody biomass in the baseline scenario and to use calculate the baseline value of $EF_{\text{projected_fossil fuel}}$ based on the emission factors for the fuel that is used in the baseline scenario, including the emission factors from wood and charcoal.

It is understood that the term “Fossil fuel” often is used as a generic term for all non-renewable fuel. But such a understanding is not 100% correct and we hence request that the Gold Standard approve that we may be allowed consider the reference to “fossil fuel” in methodology AMS-I.E version 12 to be understood to also include other forms of non-renewable fuel including non-renewable woody biomass. Furthermore, that the calculation of the value of $EF_{\text{projected_fossil fuel}}$ might be calculated based on the actual fuel used in the baseline scenario, using the formula and reference sources for such calculations as specified in the methodology.

.....

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.

.....

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)

Green Development is requesting that the project might reference to fossil fuel in baseline scenario in methodology AMS-I.E version 12 may also be understood to include other types of fuel such as non-renewable woody biomass and that the calculation of $EF_{projected_fossil\ fuel}$ might be calculated based on the emission factors of the fuel actually used in the baseline scenario including the use of non-renewable woody biomass, with the formula and reference sources referred to in the methodology.

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.*

.....

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, safeguard principles, SDG assessment, data quality monitoring frequency, emission reduction calculations, potential risk of any other aspect of the project due to this deviation. There is no negative impact or overestimation of emission reduction from the projects. The poa and the VPAs will

abide by the "Deviation Approval Requirement and procedures", version 1.1 and other GS 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.*

.....

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
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