

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 05/09/2023

1.2 | Decision

The deviation request is not approved.

SDWS 18 is a critical monitoring parameter and any deviation from the requirement shall not be accepted. In addition, since the threshold is exceeded, the project shall provide a remediation plan to improve the water treatment system in place.

The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the PDD and Monitoring Report (for the relevant MP).

The validating/verifying VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above-mentioned conditions and provide its opinion in the Validation 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_437	
Date of decision	05/09/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	08/03/2023	
Project/PoA/VPA	Project	ID – GS11864-6
	<input type="checkbox"/> PoA	ID – GS7591
	<input checked="" type="checkbox"/> VPA	ID – GS11864-6
Project/PoA/VPA title	GS7591 VPA 48-50 Safe Water Supply in the Central African Republic	
Date of listing	14/12/2022	
GS Standard version applicable	GS4GG	
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)		
Location of project/PoA/VPA	Central African Republic	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/3859	
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	Deviation from parameter SDWS 18	
Specify applicable rule/requirements/methodology	Emission Reductions from Safe Water Supply SDWS 18 rule "The water quality test applies the bacterial	

gy, with exact paragraph reference and version number	quality standard"; and "If the proportion of samples not meeting Safe Drinking Water Quality Standards exceeds a threshold, no emission reductions can be claimed for the corresponding monitoring period."
Specify the monitoring period for which the request is valid (if applicable)	Start date 08/01/2022 End date 31/12/2023
Submitted by	Contact person name: James Walker
	Email ID: james.walker@co2balance.com
	Organisation: CO2balance UK Ltd
	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 checked="" 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):

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Parameter SDWS 18 of ERSDWS does not allow for ERs to be issued where E.Coli is found in >20% of household water quality tests in year 1, and the threshold gets stricter every year. The tests are conducted at the point where the user reaches their premises. Although WASH training is provided and users are sensitized to clean their collection containers, safe water projects cover 10,000s of households and project developers cannot influence all users to clean their containers.

The effect of this is to shut down projects which are supplying safe water, as proven by the water quality tests from the water sources. CO2balance agree that it is a positive move to focus on safe collection and storage of water. However, project developers face a huge risk as project implementation and certification costs are spent in advance of this monitoring, and it can all be lost if no ERs can be issued. This essentially requires PDs to gamble as to whether any ERs will be issued.

In the case of this project (Safe Water Supply in the Central African Republic), where the systems have in built chlorination, the results are as follows:

Count of Number of E.coli colonies per level	
0	62%
1 - 10	26%
11 - 100	7%
100+	6%

CO2balance are requesting that the definition of a pass is extended to a count of 1 – 10 colonies, or that the rule whereby no emission reductions can be claimed is removed. Otherwise, the project will be shut down.

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):

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The deviation is directed at the methodology level as it is most likely applicable to all projects which apply the methodology.

Environmental integrity

The deviation does not compromise the environmental integrity of the project as the benefits of the project activity are still achieved.

Contribution to the Sustainable Development Goals (SDGs)

The project contributes to SDGs by improve service levels of water supply (SDG1), reduces illness (SDG3) and saves time for women collecting water (SDG5). If the ERs are not issuable then the project activity will stop, having a negative impact on the SDGs.

Safeguarding principles and requirements

The project will continue to sensitise communities on hygienic water collection and storge to ensure that the tests improve throughout the lifetime of the project

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):

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Project design

The deviation will not affect the project design.

Safeguarding principles assessment

The deviation will allow the project activity to continue and supply safe water to rural communities. If the rule is enforced, then the project activity will shut down causing beneficiaries to return to the baseline situation of collecting unsafe surface water.

SDG assessment

The project will consider the % of pass/fail in the calculation of SDG 3 impact.

Emissions reductions

The deviation will allow for ERs to be issued from the project activity. Otherwise, no ERs will be permitted to issue.

Monitoring frequency

The deviation will not affect the monitoring frequency.

Data quality

The deviation will not affect the data quality.

Potential risk or any other relevant aspect of the project

The risk is that the project will shut down if it is not able to issue ERs. This will cause beneficiaries to revert to the unimproved baseline sources, which will carry with it much larger risks of consuming water contaminated by E.Coli. It will also prevent project developers in investing in safe water supply projects due to the risk in not issuing ERs.

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.)*

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