

**TEMPLATE**

# 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 – 14/06/2023**

#### **1.2 | Decision**

The applied deviation request is approved for the verification approach proposed by Project Developer for the monitoring period 04/06/2020 - 02/09/2022. The Project Developer/VVB should follow the available options for verifying the monitoring survey conducted between 23.01.2022 - 28.01.2022 as listed in section 3 within this deviation request. However, PD shall:

1. Ensure and demonstrate that GHG emission reductions will not be overestimated as a result of the deviation. Where required, the PD shall apply conservative assumptions and/or discount factors to the calculations to the extent required to ensure conservativeness.
2. 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 two conditions and provides its opinion in the Verification Report. In case of the households could not be found/accessed physically, the VVB shall conduct the detail verification on surveyed data such as photos of stoves and conduct the phone call (if phone number is available) to the selected households in VVB's sample size to confirm the monitoring survey result. The report on reaching/not reaching of households shall be transparently reported. Besides, the VVB shall include the question to the households if the specific project stove was actually in used during the monitoring period.

SustainCert shall review both the PD'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_445	
Date of decision	14/06/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	14/04/2023	
Project/PoA/VPA	Project	ID – GS7142
	<input type="checkbox"/> PoA	-
	<input checked="" type="checkbox"/> VPA	-
Project/PoA/VPA title	CONSERVING THE MULANJE MOUNTAINS, MALAWI - SAVING FORESTS AND EMPOWERING MOUNTAIN COMMUNITIES WITH IMPROVED COOKSTOVES	
Date of listing	<i>(not available on SustainCert)</i>	
GS Standard version applicable	AMSIIG v10.0	
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)	19/02/2020	
Location of project/PoA/VPA	Malawi	
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	<a href="https://registry.goldstandard.org/projects/details/1453">https://registry.goldstandard.org/projects/details/1453</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Cyclone Freddy – Monitoring Survey 1 Deviation	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	CDM-EB93-A05-STAN CDM validation and verification standard for project activities Version 03.0, entry into force 07.10.2021, paragraph 325  VALIDATION AND VERIFICATION STANDARD version 1.0, published on 06.03.2023, Gold Standard for the Global Goals, paragraph 9.6.3, paragraph 4.1.2e, footnote 4	

Specify the monitoring period for which the request is valid (if applicable)	Start date 04/06/2020 (estimated, see COVID_DEV 224) End date 02/09/2022
Submitted by	Contact person name: Thomas Batardy
	Email ID: <a href="mailto:t.batardy@southpole.com">t.batardy@southpole.com</a> <a href="mailto:h.noppen@southpole.com">h.noppen@southpole.com</a>
	Organisation: SouthPole
	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 checked="" type="checkbox"/> No <input type="checkbox"/>  COVID_DEV 224, Deviation from applicable requirements listed in the COVID – 19 Interim Measures

### 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):

##### **Current project status**

The Monitoring Survey 1 (MS1) has been conducted from the 23.01.2022 until the 28.01.2022 on 430 stoves of different Age Groups from a project database of 53'722 stoves (see MS1 training report in Annex 1). Aside of the usual data related to usage, MS1 included geolocation of the interviews and pictures of all sampled stoves and sampled household's kitchens.

The Monitoring Period 1 (MP1) covers the period from 04/06/2020 until 02/09/2022. The start date of 04/06/2020 is tentative since the Deviation Request COVID\_DEV 224 states that the start can be maximum 3 years retroactive from the VVB site visit, site visit which is not yet confirmed.

The Monitoring Report 1 (MR1), will be completed and submitted upon reception of the answer to the present Deviation Request.

### ***Cyclone Freddy***

Starting on the 13.03, cyclone Freddy hit Malawi resulting in the loss of life, the flooding of large areas, the collapse of numerous houses and ultimately the displacement of hundreds of thousands of people, mostly in the country 's Southern Region<sup>1,2,3</sup> where the project is located.

Mulanje and Phalombe Districts – the two zones of project implementation – have been amongst the hardest hit, as described in Annex 2, 3 and 4. Following the floodings, inhabitants of Mulanje and Phalombe living in impacted area had to move to temporary camps often located in schools, very often leaving behind many of their possessions. As of the time of writing, part of those camps are still open and expected to close within few weeks with the beginning of the dry season.

### ***Impact of the cyclone on the Monitoring Survey***

With the information currently available and nearly one month after the end of the cyclone, it is estimated that up to 40-50% of the stoves sampled during MS1 are located in heavily affected impacted areas. While those stoves have been crediting for the whole MP1 (end of MP1 = 02/09/2022, before cyclone Freddy) the fate of those stoves is now potentially unknown. In addition, 30% of the sampled households are

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<sup>1</sup> <https://www.aljazeera.com/news/2023/3/16/cyclone-freddy-toll-passes-300-as-mozambique-counts-bodies>

<sup>2</sup> <https://news.un.org/en/story/2023/04/1135362>

<sup>3</sup> <https://www.nyasatimes.com/chakwera-declares-state-of-disaster-in-southern-region-as-cyclone-freddy-continues-to-wreck-havoc/>

located in zones accessible with difficulty or impossible to reach (mostly due to flooded ground or collapsed bridges).

If we transpose this situation to the third party Verification and the site visit of the acceptance sample, different discrepancy scenarios exist between a) the monitoring survey data and b) the visual inspection in the field:

- The sampled household is still displaced and cannot be found, the house is potentially destroyed
- The sampled house cannot be accessed
- The sampled stove was destroyed or disappeared and cannot be visually inspected by the VVB
- The sampled stove was moved to another location and the serial number does not match with MS1 data

It is important to note that due to the extent of the cyclone, all scenario's cannot be anticipated and other type of discrepancies are possible.

### **Object of the Deviation Request**

Since those discrepancies could potentially affect up to an estimated 40-50% of MS1 data, a deviation request is made to take into account the effects of the natural disaster on the concepts developed in section 9.6 of "Application of Materiality in the document Validation and Verification Standard v1.0" published on the 06.03.2023 and in particular on the concepts of reasonable level of assurance, materiality and quality of evidence :

1. Reasonable level of assurance : since the DOE "*shall achieve a reasonable level of assurance that the reported GHG emission reductions or net anthropogenic GHG removals are free from material errors, omissions or misstatements*"<sup>4</sup>, it is suggested that the DOE takes into account the loss of project material and

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<sup>4</sup> CDM-EB93-A05-STAN CDM validation and verification standard for project activities Version 03.0, entry into force 07.10.2021, paragraph 325

information caused by the cyclone and explores all alternative sources of information to elaborate his professional opinion.

Example : While, for instance, the absence of a sampled stove during the third party verification field visit would usually not lead to a reasonable level of assurance, the triangulation with other data available such as pictures of the monitoring survey from MS1, receipts of serial numbers kept by customers, consultation of sales receipt books from Stove Producers Groups (SPG's) or interviews with SPG's could support as much the establishment of a reasonable level of assurance. Should such triangulation remain impossible (disappearance of receipt books for instance) or not fully satisfactory due to the cyclone conditions, an extension of the acceptance sample to another reachable stove could act as a replacement, while not assigning a material error to the household where sufficient evidence could unfortunately not be gathered.

2. Materiality : the terms *omission*, *misstatement* or *erroneous reporting of information*<sup>5</sup> should be interpreted in the broader frame of the situation linked to the Cyclone.

Example : While, for instance, the absence of a sampled stove during the third party verification field visit would usually constitute a misstatement with respect to MS1 data, the DOE could interpret this discrepancy in the broader frame of the cyclone situation and look for triangulation of information to establish his professional opinion. Should such triangulation remain impossible (disappearance of receipt books for instance) or not fully satisfactory due to the cyclone conditions, an extension of the acceptance sample to another reachable stove could act as a replacement, while not assigning a material error to the household where sufficient evidence could unfortunately not be gathered.

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<sup>5</sup> VALIDATION AND VERIFICATION STANDARD version 1.0, published on 06.03.2023, Gold Standard for the Global Goals, paragraph 9.6.3



3. Quality of evidence : since the VVB shall *"Determine whether information provided by the Project Developer(s) or CME is reliable and credible"*<sup>6</sup> and that *"Information is credible if it is authentic and is able to inspire belief or trust, and the willingness of persons to accept the quality of evidence. Information is reliable if the quality of evidence is accurate and credible and able to yield the same results on a repeated basis."*<sup>7</sup>, the VVB shall triangulate sources of information to establish reliability and credibility whenever data discrepancies arise.

Example : For instance, a household sampled in MS1 might not be traceable and its house not witnessed – or partially witnessed - due to destruction. The VVB might then triangulate all information available to establish his best judgement. Should such triangulation remain impossible (disappearance of receipt books for instance) or not fully satisfactory due to the cyclone conditions, an extension of the acceptance sample to another reachable stove could act as a replacement, while not assigning a material error to the household where sufficient evidence could unfortunately not be gathered.

### ***Proposed course of action***

The proposed course of action for MP1 is therefore as follows :

1. Use the January Monitoring Survey data for the elaboration of the Monitoring Report 1
2. Conduct the field visit for the third party verification with the broader interpretation of the 3 concepts mentioned above to accurately reflect ER's while taking into account the exceptional situation due to the cyclone. In case sample data cannot be substantiated with enough field information due to the

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<sup>6</sup> VALIDATION AND VERIFICATION STANDARD version 1.0, published on 06.03.2023, Gold Standard for the Global Goals, paragraph 4.1.2e

<sup>7</sup> VALIDATION AND VERIFICATION STANDARD version 1.0, published on 06.03.2023, Gold Standard for the Global Goals, footnote 4

cyclone conditions, an alternative sample can act as a replacement without the attribution of a material error.

Before the third party verification is launched, the project developer is also considering the possibility to relaunch a monitoring survey of January Sample to refresh/strengthen its data in area's that are now reachable. That would allow as well to refine the expected portion of households heavily affected and anticipate where discrepancies could arise.

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.*

N/A

### 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):

Accuracy, completeness and conservativeness are conserved compared to the scenario without a Deviation Request since the Deviation Request does not affect the quality of the data collected in January.

The object of the request is to raise the attention to the fact that, during the third party verification visit, discrepancies between those data and field information might occur for an estimated 50% of the acceptance sample due to the situation on the ground created by the cyclone.

Such discrepancies can be cleared up by triangulating other information (pictures taken during the January Monitoring Survey, sales records books, interviews with Stove Producing groups) or by the extension of the sample to other stoves as a complement or replacement, with penalizing the project by attributing material errors to conditions linked to the cyclone.

### 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.*

N/A

### 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):

During the third party field visit of the acceptance sample, the three following cases can be witnessed :

1. No discrepancy between MS1 data and field information
  - The Deviation Request has no impact in this case
2. Discrepancy between MS1 data and field information
  - The Deviation Request would require the VVB to consider a larger than usual body of evidence to establish his professional opinion
3. Impossibility to reach a household
  - The Deviation Request would require the VVB to consider a larger than usual body of evidence to establish his professional opinion or to replace the unreachable household by another sample

The main potential impact of the Deviation request would be that real discrepancies leading to material errors between MS1 data and field information remain unknown in cases 2 or 3 above.

While this risk is already mitigated due to the possibility of triangulating data, if it was the case such material errors would also arise in case 1 where no impact of the cyclone could be claimed. This would be a strong indicator of the credibility and reliability of the whole project database and be an important factor to establish the professional opinion of the VVB for all 3 different type of cases.

### 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.*

N/A

### 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.)*

- Annex 1 : Enumerator's training report, 19-20.01.2023
- Annex 2 : Emergency Response Coordination Centre (ERCC), DG ECHO Daily Map | 24/03/2023
- Annex 3 : MALAWI: Tropical Cyclone Freddy Flash Update No. 12 7 April 2023
- Annex 4 : Malawi – Tropical Cyclone Freddy's Impact, OCHA

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> </ul> Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption