

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 10/07/2023

1.2 | Decision

The deviation is approved considering the insecure situation in the City of Goma, Democratic Republic of the Congo.

The verifying VVB shall ensure the following:

The site visit conducted by the local expert during the verification confirms the status of the project operation and demonstrates how the selected expert has any prior experience working in conflict zones/areas that pose a high risk to life and/or health or how this was managed.

The VVB shall ensure that no monitoring gaps exist within the eligible Monitoring Period. However, if gap(s) exist, the VVB shall ensure that conservative approach(es) have been applied and verified in line with section 3 of the Deviation Approval Requirements and Procedures (version 1.2) and overarching Gold Standard principles (as applicable).

The VVB shall ensure that the deviation detail and VVB opinion are included in the appropriate section of the monitoring and verification report (for the relevant Monitoring Period) and shall, through appropriate means at its disposal, evaluate the project's compliance with the above-mentioned conditions and provide its opinion in the Verification Report.

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

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

Request: Request a deviation from the original site visit plan due to insecurity in the region.

As part of the fourth verification of project [GS5391](#) Ecomakala Virunga Energy project, a VVB audit was conducted to verify the outcome of the project during the fourth monitoring period (01/11/2020-31/10/2021).

The precedent VVB site visit was conducted between 06/02/2020 & 10/02/2020. As per paragraph 3.1.2 of [Site Visit and Remote Audit Requirements and Procedures](#), a physical site visit is mandatory once every three years after the first physical site visit date. Hence, similar site visit was initially planned with the VVB between 01/02/2023 & 05/02/2023 (cf. confirmation email exchange from 08/11/2022 in document : '20221108_Email confirmation dates VVB site visit').

Meanwhile, the prevailing insecurity in the North Kivu Province and the city of Goma has made it unsafe for the project developer CO2logic and the VVB Carbon Check to proceed with the scheduled site visit as planned. Indeed during this period, a series of incidents (sources [\[1\]](#), [\[2\]](#)) perpetrated by the rebel group M23, including attacks on security forces and the civilian population, has created a highly volatile and unpredictable environment. These incidents posed significant risks to the safety and well-being of individuals, making it imperative to prioritize their security above all else.

On top, an official letter from the local government on the 11th of January 2023 canceled all visa applications for visitors to Goma due to ongoing military state of siege (see document: 'Letter visa suspension 20230111_with comments') . The cancellation was attributed to military movements and concerns for the safety of individuals in the area.

In the interim, an alternative means of engagement was found. A virtual meeting but with physical presence of local expert on site, to ensure verification on the project despite the physical limitations was conducted between 7th and 9th of March 2023.

The project developers are seeking for a temporary deviation regarding the application of [Site Visit and Remote Audit Requirements and Procedures](#) and will replan the site visit for the next verification (MP5) if the security situation allows the presence of international staff in the North Kivu province.

Deviation Reference Number	DEV_476	
Date of decision	10/07/2023	
Precedent (YES/NO)	Yes	
Precedent details	Follow-up site visits are not conducted within three years after the previous site visit due to force majeure	
Date of submission	05/07/2023	
Project/PoA/VPA	<input checked="" type="checkbox"/> Project	ID – GS5391
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Ecomakala Virunga Energy project	
Date of listing	01/01/2018	
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)	22/01/2018	
Location of project/PoA/VPA	Democratic Republic of Congo	
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	https://registry.goldstandard.org/projects/details/1558	
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	Request a deviation from the original site visit plan due to insecurity in the region.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Paragraph 3.1.2 of Site Visit and Remote Audit Requirements and Procedures	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/11/2020 End date 31/10/2021	

Submitted by	Contact person name: Victor Costenoble (CO2logic, part of South Pole)
	Email ID: victor@co2logic.com
	Organisation: CO2logic, part of South Pole
	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 checked="" type="checkbox"/> No <input type="checkbox"/> If yes; VVB name: Carbon Check VVB Staff name(s): Sumbul Rizwan
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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As part of the fourth verification of project [GS5391](#) Ecomakala Virunga Energy project, a VVB audit was conducted to verify the outcome of the project during the fourth monitoring period (01/11/2020-31/10/2021).

The precedent VVB site visit was conducted between 06/02/2020 & 10/02/2020. As per paragraph 3.1.2 of [Site Visit and Remote Audit Requirements and Procedures](#), a physical site visit is mandatory once every three years after the first physical site visit date. Hence, similar site visit was initially planned with the VVB between 01/02/2023 & 05/02/2023 (cf. confirmation email exchange from 08/11/2022 in document : '20221108_Email confirmation dates VVB site visit').

Meanwhile, the prevailing insecurity in the North Kivu Province and the city of Goma has made it unsafe for the project developer CO2logic and the VVB Carbon Check to proceed with the scheduled site visit as planned. Indeed during this period, a series of incidents (sources [1], [2]) perpetrated by the rebel group M23, including attacks on security forces and the civilian population, has created a highly volatile and unpredictable environment. These incidents posed significant risks to the safety and well-being of individuals, making it imperative to prioritize their security above all else. On top, an official letter from the local government on the 11th of January 2023 canceled all visa applications for visitors to Goma due to ongoing military state of siege (see document: 'Letter visa suspension 20230111_with comments'). The cancellation was attributed to military movements and concerns for the safety of individuals in the area.

In the interim, an alternative means of engagement was found. A virtual meeting but with physical presence of local expert on site, to ensure verification on the project despite the physical limitations was conducted between 7th and 9th of March 2023.

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.*

As a part of the 4th verification of Ecomakala Virunga Energy project, PP is requesting for the deviation request for not conducting the site visit due to insecurity in the North Kivu Province and the city of Goma region. As VVB has planned to conduct an onsite visit in the month of February 2023, however all visa applications got rejected "see document: 'Letter visa suspension 20230111'". Due to the interim measure the virtual audit was done with the physical presence of the local expert. The entire audit is done as a hybrid.

<https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/democratic-republic-of-the-congo-travel-advisory.html#:~:text=Country%20Summary%3A%20Violent%20crime%2C%20such, and%20some%20have%20turned%20violent.>

This is the 4th performance certification of the project, for the monitoring period (01/11/2020 to 31/10/2021). VVB has considered the Remote Audit Requirements and Procedures, version 2.0 paragraph 3.1.2 for conducting the remote audit/hybrid audit. As VVB signed the contract with PP after this VVB plan to do audit as soon as possible, due to the Goma security condition (due to crime and civil unrest, Goma areas have increased risk), the local expert is unable to go onsite without any security and VVB unable to get visa approval. For the same reason the entire verification team were not able to get visa approval and hence must rely on local expert (Rogers Muganga) who conducted the entire survey physically, the sectoral expert is available remotely throughout the audit to guide the LE and involved in the survey of end users via remotely.

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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 project developers are seeking for a temporary deviation regarding the application of [Site Visit and Remote Audit Requirements and Procedures](#) as no physical site visit could be conducted in the three years after the last one (06/02/2020 - 10/02/2020). Instead, a virtual meeting with the physical presence of local expert in Goma office was held following the remote site visit requirements prescribed by Gold Standard (cf. FVR: 'CC IPL 730 GS FVR-22-07-2020-clean'). PD seeks to replan the site visit for the next verification (MP5) if the security situation allows the presence of international staff in the North Kivu province.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

NA

**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):

This deviation has no impact on the mentioned aspects of the project: project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risks,...as all these aspects have been covered by the VVB through remote audits through:

- Video Interviews with relevant stakeholders:
 - o local project partner (Ecomakala and UGP):
 - Project coordinators
 - Employees
 - o Users and charcoal producers:
 - Recorded interviews through video calls of representative samples for the different surveys
 - Photographic evidence of the state of the stoves

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.*

VVB confirms that the deviation has no impact on the project design. above interview of stakeholder, users and charcoal is done by the hybrid mode which do not impact

any emissions reductions, monitoring frequency, data quality, potential risks of the project. Record of the interview are recorded for reference.

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.)*

- Confirmation initial site visit email document : '20221108_Email confirmation dates VVB site visit' (confidential)
- Official letter for visa suspension from the authorities: "Letter visa suspension 20230111_with comments' (confidential)
- FVR: 'CC IPL 730 GS FVR-22-07-2020-clean' (public)

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