

TEMPLATE

# DEVIATION REQUEST FORM

---

PUBLICATION DATE **11.04.2021**

Version **5.0**

---

## A. To be completed by Gold Standard

### 1 | Decision

**1.1 | Date – 16/08/2023**

**1.2 | Decision**

The deviation is approved.

However, the PD shall ensure that an Objective Observer (OO) is selected for the on-site audit as required by paragraph 2.1.2 of the Annex B of Principles and Requirements version 1.2 and have conducted the audit under the guidance of a GS-approved VVB.

The VVB shall ensure the following:

- a) The Objective observer (OO) is selected to conduct the assessment as per the applicable requirements.
- b) The site visit conducted by the OO during the verification shall confirm the status of the project operation and the mitigation plan in place to tackle the negative impacts of the project.
- c) Assess and demonstrate how the selected OO has prior experience working in conflict zones/areas that pose a high risk to life and/or health.

The VVB shall also demonstrate OO's involvement in other activities within the project's geographical area. The VVB shall report the above-mentioned information in its verification report.

The PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS PDD/ 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 and provides its opinion in its Verification Report.

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?**

Yes.

**B. To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation**

**2| Background information**

Since February 2019, violent political protests are happening in Haiti, particularly in the metropolitan area of Port-au-Prince, which is precisely the whole area of the GS2564 project. Due to this situation, the project and even the entire structure (which has other activities) faced a slowdown of its operations that put the whole NGO's sustainability at risk.

Our team on the field takes risks every day doing activities to keep the project in place. Having this context in mind, we put all of our efforts into the carbon finance side by doing the required activities (e.g., usage and monitoring survey, KPT) in order to start the 6th verification as soon as possible. Additionally, having noticed reluctant behavior from the project's technology users to allow access to execute the surveys correctly, a previous Deviation request was approved by Gold Standard (DEV\_405) granting the option for the project developer to conduct telephonic surveys.

Regardless of the political and security situation in Port-au-Prince, activities were still ongoing, which can be demonstrated by the sales that were made in 2021 and 2022 and the surveys and requests that have been made during this time, however, entry into the geographical area of the project remains limited by gang control and internal wars.

Deviation Reference Number	DEV_488	
Date of decision	16/08/2023	
Precedent (YES/NO)	Yes	
Precedent details	Allow to perform remote audits in conflict zones.	
Date of submission	02/06/2023	
Project/PoA/VPA	Project	ID – GS2564
	<input type="checkbox"/> PoA	
	<input type="checkbox"/> VPA	
Project/PoA/VPA title	EXPANDING ACCESS TO LPG IN HAITI THROUGH MICROFINANCE SERVICES	
Date of listing	26/11/2013 (Design certification)	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	29/06/2020	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	26/11/2013 (Design certification) 29/03/2021 (Design change)	
Location of project/PoA/VPA	Haiti	
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/420">https://registry.goldstandard.org/projects/details/420</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	Alternative for Remote follow-up site visits	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Gold Standard Site Visit and Remote Audit Requirements and Procedures – V2.0, establishes that, At minimum, the VVB shall conduct physical site visit within two years of project start date; and Once within every three years after the first physical site visit date. It also establishes that, for rules on possible deviations from the minimum site visit requirements, please see the Rule Update “Applicability of minimum site visit requirements by VVB”.	

Specify the monitoring period for which the request is valid (if applicable)	Start date 01/04/2021      End date 31/12/2022
Submitted by	Contact person name: Barbara Adolehoume
	Email ID: barbara.adolehoume@entrepreneursdumonde.org
	Organisation: Entrepreneurs du Monde
	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: KBS Certification Service Pvt. Ltd. VVB Staff name(s): Raul González Mitre & Javiera Labbe
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](#).*

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

Regarding minimum site visit frequency requirements for Validation/Verification Bodies (VVBs), Gold Standard rule update Site Visit and Remote Audit Requirements and Procedures – V2.0, establishes that: “At minimum, the VVB shall conduct physical site visit within two years of project start date; and Once within every three years after the first physical site visit date”, however, the project cannot comply with the rule requiring the VVB to conduct physical site visit every three years.

As mentioned before, since February 2019, violent political protests are happening in Haiti, particularly in the metropolitan area of Port-au-Prince, which is precisely the whole area of the GS2564 project. The political and security situation in Port-au-Prince

continues to this day, with most neighborhoods in the project area being controlled by outlaw gangs. This situation represents an imminent and real risk for VVB wishing to conduct physical site visits for verification purposes, something confirmed by governmental entities warning travelers on risks related to kidnapping, crime and civil unrest in Haiti<sup>1</sup>.

Under this context, and following provisions in the Rule Update “Applicability of minimum site visit requirements by VVB”, a Deviation Request is proposed for the VVB to conduct the audit visit for the 6th monitoring period remotely based on the consideration of force majeure associated with a local context within the country the geographic area of the project.

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

---

<sup>1</sup> USA: <https://travelmaps.state.gov/TSGMap/?extent=-75.774691733,17.64785931,-70.455419429,20.286428746>  
United Kingdom: [https://assets.publishing.service.gov.uk/media/6411a1f28fa8f55568784e04/FCDO\\_TA\\_019\\_-\\_Haiti\\_Travel\\_Advice\\_Ed2.pdf](https://assets.publishing.service.gov.uk/media/6411a1f28fa8f55568784e04/FCDO_TA_019_-_Haiti_Travel_Advice_Ed2.pdf)

The VVB and the PP entered into agreement on 26/06/2023. The PP has provided the current deviation request form on 29/06/2023 and it will be submitted from the VVB to the GS4GG.

According to the Human Rights Watch:

*"In 2022, Haiti remained in a long-standing political, security and humanitarian crisis that has left all government branches inoperative, compounding overwhelming impunity for human rights abuses.*

*Armed gangs intensified their control of strategic areas increasing violence, including at the main fuel terminal in Port-au-Prince, and preventing the distribution of fuel. The lack of access to fuel has harshly impacted businesses, schools, and hospitals and created shortages of basic goods including water and telecommunications".*

Source: <https://www.hrw.org/world-report/2023/country-chapters/haiti>

Furthermore, according to the United Nations web site:

*"Maria Isabel Salvador, Special Representative of the Secretary-General and Head of the United Nations Integrated Office in Haiti (BINUH), stressed that gang violence is expanding at an alarming rate in areas previously considered relatively safe in the capital, Port-au-Prince. Compared to the first quarter of 2022, criminal incidents — homicide, rape, kidnappings and lynching — more than doubled in the same period in 2023 to 1,647. Some residents have begun to take matters in their own hands, as two days ago, a group of civilians seized 13 suspected gang members from police custody, beat them to death and burned their bodies".*

Source: <https://press.un.org/en/2023/sc15266.doc.htm>

It is clear from public and reliable available sources that the situation in Haiti is critical and it would be very risky to send any auditor to the country considering the current situation of the country. Hence, KBS cannot take risks and send its auditors that seriously jeopardize their security and integrity. Thus, the deviation request is considered as appropriate and necessary to protect auditors and consultants integrity.

.....

### 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 deviation has no impact whatsoever on project design, assessment of safeguard principles, assessment of SDGs and emission reductions. Since it is very complicated to perform a physical site visit due to the specific situation in the project area, the deviation aims to comply with all GS4GG approved Site Visit and Remote Audit Requirements, and through it, help to ensure that the proper auditing techniques and means are used to evaluate the accuracy, completeness and conservativeness required for the calculation of emission reductions.

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

It would be possible to perform remote assessment following the rules and requirements from the core document "Site Visit and Remote Audit Requirements and Procedures, V1.0. The audit team will take special care to follow the requirements for audits using remote audit techniques (section 5). This has been already happened in the past during COVID-19 pandemic and therefore the selected audit team has previous experience performing remote assessments.

.....

## 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):

The deviation has no impact whatsoever on project design, assessment of safeguard principles, assessment of SDGs and emission reductions. Since it is very complicated to perform a physical site visit due to the specific situation in the project area, the deviation aims to to comply with all GS4GG approved Site Visit and Remote Audit Requirements and Procedures, and through it, reinforce the data quality and monitoring of the project.

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



Following the requirements from the core document "Site Visit and Remote Audit Requirements and Procedures, V1.0 will reduce any possible impact when performing remote assessment. The selected audit team has previous experience performing remote assessments and this audit will not be different than any other. The verification team performed the remote assessment risk & mitigation measures required by KBS for this kind of audits. As a result, the estimated impact on performing the remote assessment is considered minimum as soon as it would be possible to perform proper remote interviews.

.....

### 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	<p>Additional information added:</p> <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> <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption