

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**
Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 23/08/2023

1.2 | Decision

The deviation request is conditionally approved considering that no baseline survey was conducted at the time of validation. The Developer will be allowed to deviate from the mentioned methodology pre-requisite, subject to adhering to the following safeguards in place:

1. Developer can opt for using the DHS survey data based on the condition that the project survey information used for baseline fuel and cooking technology type (both for primary and secondary fuels before using the project charcoal stove), shall be reflective of the general cooking practices in the baseline scenario. (Details described in the raised FAR.)
2. Project developer shall conduct the Baseline field test among project end users. The locations where there is non-feasibility to conduct baseline tests, the project developer shall select representative non-project population within project boundary with similar socio-economic status and shall record the necessary details reflecting the baseline scenario.

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

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above requests and provides its opinion in the Validation Report. SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

FAR for project developer: Should the results of project survey indicate significant inconsistency from identified baseline scenario, the project developer shall make address the issue following an approach for 1st verification that leads to conservative emission reductions, while the developer shall seek design change and make necessary changes for subsequent verifications.

FAR for VVB: During verifications, the VVB(s) must select the random samples in the project database and interview end users for baseline cooking practice (both primary and secondary fuel before using the project charcoal stove) to compare to the findings with selected baseline scenario i.e., charcoal consumption only. Should there is inconsistencies, the VVB shall apply the approach that leads to conservative emission reduction estimation. The number of samples and random selection method must follow the Sampling requirement and be transparently reported in the Verification report.

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_500	
Date of decision	23/08/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	01/08/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS11189
	<input checked="" type="checkbox"/> VPA	ID – GS11306
Project/PoA/VPA title	VPA Title: Improved Cookstove and Safe Water Programme – Nigeria – VPA 48	
Date of listing	30/07/2021	
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)	02/02/2022	
Location of project/PoA/VPA	Host country(ies): Nigeria	
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/3327	
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	Request for exemption from conducting baseline survey and BFT	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Para 4 (Baseline Studies) under section 2, of the v3.1 of the methodology “Technologies and Practices to Displace Decentralized Thermal Energy Consumption”	
Specify the monitoring period for which the request is valid	Start date Not applicable	End date

(if applicable)	
Submitted by	Contact person name: Mark C. Turgesen
	Email ID: mturgesen@impactwater.co
	Organisation: Impact Water
	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:

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

The stated goal of the VPA is the widespread dissemination of improved charcoal cook stoves (ICS) to households in Nigeria.

PP seeks deviation from para 4, section 2 of the applied methodology TPDDTEC V3.1 to address the round 4 design certification review feedback received from SustainCERT.

As per para 4 of section 2 of the applied methodology TPDDTEC V3.1:

the project proponent must conduct the following baseline studies for each baseline scenario:

- *Baseline NRB if biomass is one of the baseline fuels*
- *Baseline survey (BS) of target population characteristics*
- *Baseline performance field test of fuel consumption*

The PP has adopted following approach to establish the baseline scenario, the target population characteristics and baseline charcoal consumption value:

Baseline scenario / baseline population characteristics

The target population characteristics has been determined using DHS Nigeria 2018, published in October 2019. The 2018 Nigeria Demographic and Health Survey (2018 NDHS) was implemented by the National Population Commission (NPC) in collaboration with the National Malaria Elimination Programme (NMEP) of the Federal Ministry of Health, Nigeria. The 2018 NDHS is a national sample survey that provides information on demographic and health indicators. A representative sample of approximately 42,000 households was selected for the survey. Also, the geographical boundary of the VPA is entire Nigeria. Thus, this makes DHS far more comprehensive than any baseline survey that the PP may have conducted by himself. The DHS Nigeria study is available in public domain and provides complete information related to household characteristics of the sampled users.

Also, please refer Annex 5 of the DHS which presents the detailed household survey questionnaire used for surveys. Page 565 of the DHS report confirms that the end user details including name and address were collected during the survey. Page 568, 569 confirm that information on the household size was also collected. Page 575 also captures information on the types of fuel used for cooking and if the cooking is done indoors/ outdoors etc.

Lastly, it is worth noting that the **data collected** specified under Section B, page 11 of the methodology specifies the following:

"the data collected is specific to the characteristics of each baseline scenario, and should be tailored accordingly. Information on the following needs to be gathered:....."

Thus, the exact requirements of "data collected" is not mandated and may be tailored to the baseline scenario specific to the project. Given there is singular baseline/project scenario in the VPA (i.e. charcoal users in the baseline being replaced by more efficient charcoal ICS in the project), hence the baseline scenario established in the VPA using DHS rather than actual baseline surveys conducted by PP is deemed appropriate and in compliance with the methodology. Thus, **PP requests GS to allow PP to use DHS report for establishing target population characteristics and baseline scenario rather than conducting a limited baseline survey.**

Baseline fuel consumption

For determining the baseline charcoal consumption value ($P_{b,y}$), instead of conducting Baseline performance field test of fuel consumption the PP has used the value established for baseline charcoal consumption in Host country from CDM project (CDM PoA 5342, CPA 0010). The referred CDM project (CDM PoA 5342, CPA 0010) was included in the CDM PoA in April 2019 and hence is deemed recent. Also, it has already been validated by an accredited third party rendering it credible. Lastly, this value was also found conservative than some of the other sources which were available. For instance, the UN data for charcoal consumption results in higher baseline emissions from charcoal households than that established by PP. The baseline selected in the project is 5.46 tonnes/year/HH whereas that arrived using UN charcoal consumption data is >8.3 tonnes/year/HH. Hence the value established using publicly available UN charcoal data has not been considered as a conservative measure. Thus, the approach used by the PP in establishing the charcoal baseline is indeed very conservative. Refer ER sheet provided at the link shared below wherein this has been clearly demonstrated.

https://www.dropbox.com/scl/fi/u5io8b6t0syomel6uw7pw/GS-VPA-11306-Nigeria-VPA-48-ER-Sheet-v-5.0_09032023.xlsx?rlkey=8o9ypc8uv1ceb1ozrm4ipxdis&dl=0

Also, as part of design certification review SC had raised question on $P_{b,y}$ (comment/Request 4, (1)(d)) and has already closed the same during design certification round 3 feedback. **Hence the PP requests GS allow use of established baseline fuel consumption instead of conducting Baseline field test for determining the baseline charcoal consumption/HH/year.**

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

NA

3.2 | Assessment of the deviation:

3.2.1 | Deviation assessment (to be completed by Project developer):

The deviation does not impact the applicability, accuracy, completeness, or conservativeness of GHG assertion. The PP seeks deviation only against Para 4 under section 2 of the v3.1 of the TPDDTECH. Apart from this PP shall follow requirements of the applied methodology.

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

NA

3.3 | Impact of the deviation:

3.3.1 | Impact assessment (to be completed by Project developer):

No impact envisaged.

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

NA

3.4 | Documents:

- Email from SustainCERT
- Nigeria Demographic and Health Survey 2018

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