



**Gold Standard**<sup>®</sup>  
for the Global Goals

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 – 11/10/2023**

**1.2 | Decision**

Not Approved.

The proposed project is applying the methodology AMS III.AV which falls under Type III: "Other GHG emission reduction project which does not fall into Type I and Type II" and the emission reduction must be less than 60,000 tCO<sub>2</sub>e per year as mentioned in the [GHG Emissions Reductions & Sequestration Product Requirements](#):

Therefore, the Project Developer must ensure that the emission reduction for each VPA does not exceed an upper bound threshold of 60,000 tCO<sub>2</sub>e per year.

The developer may include a new VPA to accommodate the excess ERs in accordance with necessary methodology requirements.

**1.3 | Is this decision applicable to other project activities under similar circumstances?**

**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

Project GS11713 is a drinking water project activity in Nigeria.

The project was registered as a CDM CPA under methodology AMS-I.E version 04, sectoral scope 01. During renewal of the PoA and the renewal of the crediting period, the project must use the latest version of the methodology. The latest version of methodology AMS-I.E is no longer applicable for drinking water solutions.

During the renewal of the crediting period, the project will therefore be renewed with methodology AMS-III.AV version 08, sectoral scope 3.

The POA GS11574, include both methodology AMS-III.AV for drinking water projects, and methodology AMS-I.E for ethanol stove project activities (not relevant for this deviation request).

In accordance with the listed GS PoA, the small scale limitation for project under methodology AMS-I.E is 45 MW of installed capacity, while the small scale limitation of projects under methodology ASM-III.AV version is 180 GWh of total energy savings per year per VPA.

The project was within the small-scale limitation of 45 MW installed capacity during crediting period 1. But the energy savings annually is almost 50% higher than the small-scale limitation of 180GWh of energy saving annually as applicable during crediting period 2.

It should be noted that there has been no expansion of the project since the end of crediting period 1. Moreover, the project registered several CPA DDs in Nigeria, but implemented all the project activity in one project, so as to keep the transaction cost down as the project remained within the applicable small-scale limitation applicable at the time of project implementation.

We request that Gold Standard will approve for the project to claim carbon credits from all the 53,841 households that has been included in this project, even though total energy savings from these households might exceed the 180 GWh of annual energy savings. The project might achieve energy savings which might be up to 50% higher than 180 GWh small-scale limit of energy savings annually. The project shall however remain within the Small-Scale limit of 45 MW as described in the CDM CPA DD, which was applicable at the time of project implementation.

[https://cdm.unfccc.int/ProgrammeOfActivities/cpa\\_db/PQRU1B9A2YV3TFEXLNWSJZKC5IHMD6/view](https://cdm.unfccc.int/ProgrammeOfActivities/cpa_db/PQRU1B9A2YV3TFEXLNWSJZKC5IHMD6/view)

PoA GS11574

<https://platform.sustain-cert.com/public-project/2819>

Deviation Reference Number	DEV_526	
Date of decision	12/10/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	20/09/2023	
Project/PoA/VPA	<input type="checkbox"/> Project	ID – GSXXXX
	<input type="checkbox"/> PoA	ID – GS574
	<input checked="" type="checkbox"/> VPA	ID – GS11713
Project/PoA/VPA title	CPA-NI-003-Nigeria	
Date of listing	Not Applicable	
GS Standard version applicable	Not applicable	
Date of transition to GS4GG (if applicable)	In the process of being transferred from CDM to GS4GG	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	28/05/2021 will be the start of the second crediting period, which will be under GS4GG	
Date of design certification/inclusion (if applicable)	04/08/2023	
Location of project/PoA/VPA	Host country: Nigeria	
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://platform.sustain-cert.com/certification/projects/2960">https://platform.sustain-cert.com/certification/projects/2960</a>	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Extension of small-scale limitation	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	<p>Reference from PoA GS11574</p> <p>«Total energy savings per year per VPA will be within 180 GWh(th) limit of small scale for solutions which is implemented in accordance with Methodology AMS-III.AV and 45 MW limit for small scale for solutions which is implemented in accordance with methodology AMS-I.E version 12».</p> <p>See Eligibility Criteria 3.1.2 in PoA DD.  <a href="https://platform.sustain-cert.com/public-project/2819">https://platform.sustain-cert.com/public-project/2819</a></p>	

Specify the monitoring period for which the request is valid (if applicable)	Start date End date Not applicable
Submitted by	Contact person name:
	Email ID:        hn@greendevlopment.no
	Organisation:    Green Development AS
	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: Not applicable  VVB Staff name(s): Not applicable
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> COVID_DEV 273

### 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):

Project GS11717 shall be allowed to claim VERs for project activities for up to 50% more than the small-scale limitation of 180 GWh of energy savings annually. The project shall however at all times remain within the small-scale limitation of 45 MW of installed capacity as was the small-scale limitation applicable when the project was implemented. The project shall not expand to include more than the 53,841 project participating households that was included in the project during the first crediting period.

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

Not applicable

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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 deviation request complies with all the requirements as listed in section 3 "REQUIREMENTS" in "Deviation Approval requirements and procedures. Version 1.2

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

Not applicable.

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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.*

The deviation will have no impact on project design, safeguard principles assessments, SDG assessment, emission reduction, monitoring frequency, data quality, political risk or any other relevant aspects of the project. The deviation request will also not impact emission reductions, but the deviation request will impact the portion of the emission reduction achieved by the project, that may result in VERs being issued.

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

The impact of the requested deviation will be that more VERs might be issued from the project. The number of VERs to be issued will then be closer to the real emission reduction achieved by the project activity.

By allowing the project to claim VERs from all the project activities implemented by the project, the project does not have to exclude part of the project activities (boreholes) from the project as the funding from the VERs generated will then continue to be sufficient to provide support and repair for all the boreholes provided by the project.

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

Not applicable.

### 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.)*

- CPA DD
- PoA DD GS11574

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