



DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 19/10/2023

1.2 | Decision

The deviation request is hereby approved.

Considering the situation in the country that affected the project as explained by the PD, the same has been granted with a unique exception and allowed a deviation from the rule stated in paragraph 5.1.46 of the GS Principles and Requirements v1.2.

The project can submit the renewal of CP and can claim emission reductions for the gap period of 1 year.

This decision is subject to fulfillment of the following conditions:

1. The PD shall ensure that the project comply with all relevant monitoring requirements within the gap period.
2. The contracted VVB shall review all relevant project documentation and provide its opinion regarding the information presented within this request and validate the same providing proper justification and evidence.

If the VVB cannot confirm the information and has a negative opinion regarding the reasons the PD presented to justify the delay, then paragraph 5.1.46 of the GS Principles and Requirements v1.2 shall be applied, and the PD cannot claim any issuance of Certified Products and/or Impact Statements available during the certification cycle for the period delay.

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_544	
Date of decision	19/10/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	10/10/2023	
Project/PoA/VPA	Project	ID – GS7312
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Promoting Improved Cooking practices in Nigeria	
Date of listing	25/04/2019 (Initial GS7312 project listing date)	
GS Standard version applicable	GS4GG Principles and Requirement, Version 1.2, dated 24th October 2019	
Date of transition to GS4GG (if applicable)	Not applicable	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not applicable	
Date of design certification/inclusion (if applicable)	24/10/2019 (Initial GS7312 project Design Certification date)	
Location of project/PoA/VPA	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/1468	
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	Deviation from GS4GG principles and requirement Version 1.2, para 5.1.46 regarding delay in the completion of re-validation beyond the last date of current certification cycle.	

<p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p>	<p>1. GS4GG principles and requirement, section 5.1.46 states "Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Product and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay)."</p> <p>https://globalgoals.goldstandard.org/101-principles-requirements/</p> <p>2. COVID 19: INTERIM MEASURES, PUBLICATION DATE 14/06/2022, 5.1 Extension Request under Rule 5 (Submission Timelines)- Clause 5.1.1.</p> <p>https://globalgoals.goldstandard.org/ru-2021-covid-19-interim-measures-update/</p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>NA</p>
<p>Submitted by</p>	<p>Contact person name: Prakash Kumar Mishra Email ID: p.mishra@persistentclimate.com Organisation: PersistentClimate on behalf of Toyola Energy Services Limited. Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes; VVB name: VVB Staff name(s):</p>
<p>Any previous deviations approved for the same project activity/PoA/VPA(s)?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>

3 | Deviation detail

3.1 | Description of the deviation:

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

Toyola Energy Services Limited, the Project Participant, wishes to renew the crediting period of GS7312: Promoting Improved Cooking practices in Nigeria which was due on 24/10/2022 after the end of the 1st crediting period (10/03/2017 to 23/10/2022).

As per the Gold Standard, GS4GG principles and requirement, version 1.2, dated 24th October 2019, section 5.1.46 **“Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay).”**

The Project Participant, Toyola Energy Services Limited thus requests a deviation from the above requirement for the project GS-7312: “Promoting Improved Cooking practices in Nigeria”.

The project under concern has been instrumental in bringing a significant change in the rural and semi-urban ecosystem in Nigeria by providing more than 800,000 households with clean and efficient cooking technology. Toyola Energy Services Limited manufactures the project ICS and implement at a subsidized price to the beneficiaries who are primarily the local communities in the host country of Nigeria. The subsidized price and making payments in installments (on top of subsidized price for ICS) helps in easy adoption of project ICS by needy beneficiaries. The subsidy bill is settled by Toyola Energy Services Limited using proceeds from carbon credits. This ensures that the Toyola Energy Services Limited see the manufacturing and sale of project ICS as a viable and sustainable business and are not affected by price reduction being offered to ICS beneficiaries.

In this regard, please also note the following:

1. The deviation request submission is based on precedence set from the Gold Standard Deviation number- DEV_158¹ which states:

https://globalgoals.goldstandard.org/standards/DEV_158_Deviation-Request-Solar-cooking-in-Chad.pdf

The project is allowed to claim a part of their gap period following a delay in submitting request for renewal of its crediting period, if it can demonstrate that

- a) The delay in applying for CP renewal was due to exceptional circumstances, for example the project’s presence in a refugee zone/conflict area.
- b) The project has all the monitoring data available in compliance with the methodology version applicable at time of renewal of crediting period.

The maximum allowable gap in such cases is

- a. 1 year for non-LDC/LLDC/SIDS

¹ https://globalgoals.goldstandard.org/standards/DEV_158_Deviation-Request-Solar-cooking-in-Chad.pdf

- b. 2 years for LDC/LLDC/SIDS
2. Clause 5.1.1 of the COVID 19: INTERIM MEASURES², v6 – 14/06/2022, allows the project developer to seek an extension by submitting a request to Gold Standard if Submission of design review for renewal is later than the last date of current certification cycle.

Primary causes of delay:

1. The Central Bank of Nigeria's Naira redesign policy which introduced redesigned 200, 500 and 1,000 Naira notes into the Nigerian financial system on 26th October 2022, led to massive disruption in economic activities and an unprecedented spike in the cost of essential goods and transportation services across states in the country. Several strike actions to compel the government for urgent solutions to the dual crisis of Naira and petrol scarcity were reported when the project proponent was expected to do the ground work. Below are some of the publicly available news/information regarding these regions:
 - <https://www.premiumtimesng.com/news/headlines/580177-naira-redesign-nigerians-grapple-with-hardship-as-pos-transaction-charges-jump-400.html>
 - <https://punchng.com/new-naira-chaos-spreads/>
 - [LCCI Laments Negative Impact Of Naira Redesign On Businesses \(leadership.ng\)](#)
 - [TIMELINE: From old notes to old notes -- the back and forth with naira redesign policy \(thecable.ng\)](#)
 - <https://www.premiumtimesng.com/opinion/587791-naira-redesign-implementation-failure-and-its-consequences-by-kingsley-moghalu.html>
2. The delay in renewal was also due to safety constraints in visiting the project region as it was affected by an internal socio-political-economic upheaval within the State of Nigeria. Due to which, the plan of achieving the design certification renewal for the aforesaid project was compromised to a large extent. Over the months, the different pockets of the region have witnessed several incidents of violence at the time when the project should have started the ground work related to kitchen performance tests in the randomly selected population in the host country. Several conflicts such as violence against civilians and protestors, explosions, looting and property destruction, were reported due to the Nigerian Presidential election, held on February 2023. Below are some of the publicly available news/information regarding these regions around that time:
 - <https://www.dw.com/en/more-violence-feared-in-nigeria-as-elections-approach/a-62065448>

² <https://globalgoals.goldstandard.org/ru-2022-covid-19-interim-measures-update/>

- <https://acleddata.com/nigeria-election-violence-tracker/>
- <https://apnews.com/article/nigeria-government-ad45d526e58e8b03555d72226d66a86d>
- <https://www.aljazeera.com/news/2023/3/2/how-violence-robs-nigerians-of-their-votes>
- <https://www.vanguardngr.com/2023/03/violence-that-marred-2023-elections/>

3. No substantial progress could be made towards the completion of renewal before the last date of current certification cycle, due to travel/movement restrictions in Nigeria following the COVID-19 pandemic until December 2022. Nigeria relaxed COVID-19-related entry requirements only on 12th December 2022. Below are some of the publicly available news/information regarding these regions:

- <https://www.premiumtimesng.com/health/health-news/570188-breaking-covid-19-nigeria-relaxes-travel-protocols-cancels-pcr-test.html>
- [Revised Covid-19/Public Health guidelines for all Aviation Service Providers \(Domestic International Operations\). NCAA](#)

It is to be noted that this GS project last performance review was conducted for the monitoring period 01/07/2021 to 31/12/2021 and since then PP could not conduct the fifth performance review for the period from 01/01/2022 to 23/10/2022 (last date of current CP1 certification cycle) for the obvious above mentioned reasons.

However, during the delay period the project participant maintained all the monitoring data in compliance. We would like to further submit that due to the non-renewal of the crediting period and no further issuances, Toyola Energy Services Limited programme GS ID-7312 is finding it challenging to continue the service, maintenance and sales of cook-stoves under the project, resulting in the risk of end-user shifting to traditional stoves.

Nigeria, being a non-LDC country where the precedence statement (DEV_158) has allowed for a 1-year gap in design recertification. In order to continue carrying out these activities, Toyola Energy Services Limited is requesting for this deviation to be approved based on the precedence statement in conservative manner although this project would be loosing on huge amount of accrued emission reduction over one year gap period.

Hence, it is requested to grant an extension to renew the crediting period of the concerned project.

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.*

Not applicable.

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):

As stated above, the present request is to deviate from requirement 5.1.46 GS4GG Principle and Requirements Version 1.2. Apart from deviation from stated rule, the project complies with all other requirements.

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.*

Not Applicable.

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):

There are no negative impacts envisaged from this deviation request as it does not hamper with any of the compliances with regards of the methodology and GS4GG requirements. This deviation approval will avoid related risk from the already distributed highly subsidized and most popular locally manufactured improved cookstoves and will allow to further continue the service while generating real SDG impacts.

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.*

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.)*

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