TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 15/11/2023

1.2 | Decision

The deviation request is approved only for the corresponding monitoring period.

The PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).
The verifying VVB shall, through appropriate means at its disposal, report in detail the assessment of the Project's compliance with the mentioned conditions in this deviation requests and provide its opinion in the corresponding 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?

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_564	
Date of decision	15/11/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	05/10/2022	
Project/PoA/VPA	☒ Project	ID – GS12015
	☐ PoA	ID – New Project
	☐ VPA	ID – GSXXXX
Project/PoA/VPA title	Safe Water in Uganda	
Date of Listing	17/12/2022	
GS Standard version applicable	Version 1.2	
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)	N/A	
Location of project/PoA/VPA	Uganda	
The scale of the project/PoA/VPA	☐ Microscale ☒ Small scale ☐ Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	N/A	
Status of the project/PoA/VPA	☐ New ☒ Listed ☐ Certified design ☐ Certified project	
Title/subject of deviation	Safe Water in Uganda Project	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Gold Standard "Methodology for emission reductions from safe drinking water supply", Section 4.2. Version: 1.0, published on 03/05/2021.	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/12/2021 End date	
Submitted by	Contact person name: Fulya EKİNCİ ÖZEN Email ID: fulya@netzero.com.tr	
	Organisation: Net Zero Danışmanlık A.Ş.	
	Project participant: Yes ☒ No ☐	

Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes ☒ No ☐ If yes; VVB name: Earthood Services Pvt. Ltd. VVB Staff name(s): Arohi Jain
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☐ No ☒

3| Deviation detail

3.1 | Description of the deviation:

**Guidance* Use the space below to describe the deviation and substantiate the reason for requesting a 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):

Net Zero Türkiye is requesting a deviation from section 4.2 of the "Methodology for emission reductions from safe drinking water supply", for the planned project "Safe Water in Uganda" to obtain revenues that will later be reinvested in our voluntary emission reduction projects in the region and will be able to continue the maintenance and repair processes throughout the crediting period.

Since the primary purpose of Net Zero is to meet the needs of disadvantaged groups as soon as possible, some of our borehole projects have been activated and continue their activities without conducting a Baseline Survey within a 1 km radius as per methodology requirements. Besides that, Uganda had a nationwide curfew from March 2020 to October 2021 due to COVID-19. In this case, it was not possible for our company, which is based in Türkiye, to go to Uganda to conduct a baseline survey there.

Therefore, we would like to request the deviation for allowing the conducting of baseline surveys in the sample area which is located out of a 1 km radius for retro actively commissioned boreholes as in line with paragraph 4.1.49 of Principles & Requirement Version 1.2 Published October 2019 4.1.49. Only retroactively commissioned boreholes

will be submitted for preliminary review (time of the first submission) within one year of the borehole start date of serving drinking water. While choosing the sample area the Guideline "Sampling and surveys for CDM project activities and programs of activities Version 04.0" will be used. Since this sample area will be also the project area of our newly planned SDWS projects in the region.

The World Bank's findings show that Africa's water crisis is more pressing than ever. To address water shortages, many African countries have recently been forced to take radical steps. The World Health Organization recommends frequent soap hand washing as the best defense against the coronavirus. It is obvious that maintaining efforts to stop the spread of COVID-19 and potential pandemics depends on making safe water accessible to everyone. However, in Sub-Saharan Africa, roughly 63% of residents in urban areas—the main virus clusters—find it difficult to acquire basic water services and are unable to wash their hands. Approximately 70% to 80% of the diseases in the area are related to the region's poor water quality. For instance, cholera and dysentery are two of the main reasons for infant mortality.

To provide basic sanitary services and safe drinking water to the entire population, $10–$15 billion will be required annually. Currently, the industry receives just a relatively small fraction of international aid, with African nations investing little more than 0.5% of their GDP there. In this respect, developing projects in Africa is as urgent as it is necessary (World Bank, n.d.). Therefore, our purpose in developing SDWS projects is to follow the maintenance processes throughout the credit period of the projects and to ensure that the local people gain the co-benefits and meet the water needs, which is more urgent than ever, although we could not perform the baseline survey within the time required.

Also, we would like to develop fast and reliable solutions for the needs and mid to long-term projects in Sub-Saharan Africa with a solution partner. For this purpose, we are conducting due diligence for our newly planned projects in the regions where we developed retroactive projects. By including retroactive projects in our multi-country PoA or standalone projects, we will obtain assets that we can reinvest in the region. This will help us explore much of the positive impact we can have there.

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.*

With reference to section 4.2 of the applied methodology "Methodology for emission reduction from safe drinking water" it is mandatory for the baseline survey samples to be located within 1 km of the CWS/ CWT. Since the baseline survey for the project was conducted during the nationwide curfew in Uganda from March 2020 to October 2021 due to COVID-19 it was difficult for the project developer to travel form Turkey to Uganda. As a result of this, the samples of baseline survey were selected outside the 1km radius of the project implementation area.

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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):

Previously, we sent a query about this subject to Gold Standard (Clarification Reference Number: CL_111). Referring to section 2.1.1 of the SDWS Methodology, we asked if it was possible to submit retroactive projects, referring to the methodology being applicable to project activities that introduce a new or rehabilitate an existing, zero-emission low-emission technology to supply safe drinking water. We confirmed that we would conduct the Baseline Survey after the boreholes were commissioned.

We also received the answer that the methodology does limit the application of the retroactive projects in line with GS4GG Principles and Requirements and it is not related to the date of conducting the baseline survey, referring to the definition of retroactive projects in section 4.1.42 of GS4GG Principles and Requirements.

The baseline survey could be implemented after the commissioning of the project under the conditions:

– The PD could demonstrate the survey is conducted to reflect the real baseline situation before the start of the project

– No project users shall be included in the baseline survey.

– The baseline survey shall be conducted with the representative set of samples following the sampling requirements in section 4.2 of the methodology."

In this direction, we would like to develop a combined survey method to conduct a representative baseline survey, since there is no difference between our retroactive and regular projects of boreholes in terms of the demographic structure, representation of the people of the region, technology, and methodology.

For the combined survey method, in line with the response above, we intend to create a sample group for our retroactive projects. We are planning a Baseline Survey for our proposed regular projects. In parallel, our team is conducting a Project Survey for the boreholes already drilled. Also, to analyze the baseline scenario before boreholes are drilled, a baseline survey is also conducted for households where the project survey is conducted.

The following quotations are the requirements of the Gold Standard:
"– The baseline survey shall be conducted with the representative set of samples following the sampling requirements in section 4.2 of the methodology."
"– The PD could demonstrate the survey is conducted to reflect the real baseline situation before the start of the project"
Our baseline survey demonstrates the real baseline state, as we specify a representative sample for our retroactive projects that are different from the sample of the project surveys, but very similar in terms of the demographic structure, representation of the people of the region, technology, and methodology.

"– No project users shall be included in the baseline survey."
When selecting the sample, we did not include project users in the baseline survey as per the specified requirement below. Nonetheless, we included individuals from different region sharing characteristics such as geography, demographics, and water needs similar to those of the project area in the baseline survey.

Since we are designing a combined survey we mentioned above in line with the response we received from the Gold Standard, our deviation request is fully compliant with the principles and requirements and also the SDWS methodology.

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.*

The CME has requested the deviation since the baseline survey for the project was conducted during the nationwide curfew in Uganda from March 2020 to October 2021 due to COVID-19 which was verified from the news articles links provided by the CME, and it was difficult for the project developer to travel from Turkey to Uganda at the project implementation area. As a result of this, the samples of baseline survey were selected outside the 1km radius of the project implementation area. VVB has assessed the 'Comparison analysis of the cities' and 'Analysis of regions where boreholes are located' documents submitted by the project developer to analyze the demographic conditions and whether the areas of baseline survey have similar water accessibility and usage patterns as compared to the project implementation area. On assessment, the VVB has found that the rural population is higher than the urban areas in the cities. The rural/ urban ratios are similar in most cases which is approximately 3. It was also observed that the growth rate in the all the cities ranges from 1% to 5% and the access to safe water in the cities is between 60% to 80% which indicates that the implementation of the project will prove a boon for the communities staying in the regions.

Since the CME conducted the baseline survey in a different location than the project implementation area. Hence, none of the project beneficiaries were part of the baseline survey.

Therefore, the VVB is of the opinion that the deviation requested by the project developer is acceptable.

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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, a 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 requested deviation does not have any negative impact on project design, safeguarding principles, monitoring frequency, data quality, or any other aspect of the project. It will only allow us to include the boreholes of the planned project (standalone project) that we were previously unable to conduct baseline surveys due to external circumstances, thus we will reinvest the revenue from retroactive projects as described in line with the GS Requirements to facilitate more people's access to clean drinking water in Uganda. This will increase the overall impact of our multi-country project and will be a source of a much-needed asset.

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.*

The VVB is of the opinion that since, the areas in which the baseline survey is conducted have similar demographic conditions, water accessibility and water usage patterns to the areas where the project is implemented, there will be no negative impact/ deviation on the project design, safeguarding principles, monitoring frequency, data quality, or any other aspect of the project. The parameters that have been determined using the baseline survey were Water sources in the project boundary, Stove technologies used in the project boundary, Percentage of fuel f use in target population (xf) and Cb and the other alternative for determining the values of these parameters were not considered since this is the most reliable and appropriate value which can be used during the implementation of the project. Further, the project developer proposes that the area in which the baseline survey was conducted will act as project implementation for their upcoming projects.

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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 them here to ensure they are omitted.)*

Reference

Covid-19: Solving Africa's water crisis is more urgent than ever. World Bank Blogs. (n.d.). Retrieved September 30, 2022, from

https://blogs.worldbank.org/nasikiliza/covid-19-solving-africas-water-crisis-more-urgent-ever

Version number	Release date	Description
5	11.04.2022	Additional information added: - 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