



# DEVIATION REQUEST FORM

---

PUBLICATION DATE **11.04.2021**

Version **5.0**

---

## **A. To be completed by Gold Standard**

### **1 | Decision**

**1.1 | Date -24/01/2024**

**1.2 | Decision**

The deviation request is NOT APPROVED.

Batch 1 categorizes countries across different regions of the world. The information supporting the baseline scenario, additionality and legislations are different from each of these countries, and hence the grouping all the countries under similar baseline conditions is not a feasible approach as required under para 8.10.3 of the PoA requirements.

Batch 2 and 3 categorizes countries in similar region however the baeeline and legislations are different from each of these countries, and hence the grouping all the countries under similar baseline conditions is not a feasible approach as required under para 8.10.3 of the PoA requirements.

CME shall follow the requirements of p.8.10.1 of PoA Requirements and Procedures v2.1. The PoAs that are not granted with this exception can add new countries to the PoA boundary after PoA design certification via a formal Design change request and payment of the design change fee. This process requires submission of a real case VPA DD for activities developed in each of the countries.

**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_590	
Date of decision	24/01/2024	
Precedent (YES/NO)	NO	
Precedent details	NA	
Date of submission	05/12/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS12204
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Sistema.bio Global Carbon Programme: Waste management, clean energy and regenerative agriculture on family farms	
Date of listing	27/09/2023	
GS Standard version applicable	Gold Standard for the Global Goals	
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)	Not design certified yet	
Location of project/PoA/VPA	Batch 1: Kenya, India, Mexico, Colombia Batch 2: Nigeria, Zambia, Mozambique, Rwanda, Ethiopia Batch 3: Honduras, Guatemala	
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	<a href="https://registry.goldstandard.org/projects/details/4269">https://registry.goldstandard.org/projects/details/4269</a>	
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	Multi-country PoA: Exception to submit one real case VPA DD from one of the countries included in the PoA boundary at the time of PoA Design Certification and subsequent real case/regular VPA(s) for the other countries to be included in the PoA at a later stage.	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	PROGRAMMEME OF ACTIVITY REQUIREMENTS AND PROCEDURES, version 2.1 Paragraphs 8.10.1 to 8.10.4
Specify the monitoring period for which the request is valid (if applicable)	Start date N/A                      End date N/A
Submitted by	Contact person name: Stephanie Zayed
	Email ID: stephanie@sistema.bio
	Organisation: Sistema.bio, Inc.
	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: N/A  VVB Staff name(s): N/A
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:

*\*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):

Sistema.bio is a social enterprise that manufactures and distributes high-quality, affordable biodigesters that enable farmers around the world to convert waste into energy and fertilizer.

Sistema.bio is in the process of implementing a multi-country Gold Standard Programme of Activities (PoA) *GS12204 Sistema.bio Global Carbon Programme: Waste management, clean energy and regenerative agriculture on family farms* with the objective to enable farmers to convert waste into energy, promoting

sustainability, independence, and productivity while mitigating the greenhouse gas emissions generated by farms around the globe.

PoA activities are:

- Animal Waste Management System and biogas for thermal application following the *Methodology for Animal Manure Management and Biogas Use for Thermal Energy Generation, version 1.1; and/or,*
- Biogas for electricity generation following the *Methodology AMS-I.F.: Renewable electricity generation for captive use and mini-grid, version 5.0.*

This will be a global multi-country PoA proposing to group countries in batches based on estimated implementation dates while ensuring homogeneity with respect to Additionality, Baseline scenario, Emission reductions/SDG Impact calculation, and Legislation applicable to the applied technology (Details below in section 3.2.1 | *Deviation assessment*).

- Batch 1 (2023-2024): Kenya, India, Mexico, Colombia.
- Batch 2 (TBD): Nigeria, Zambia, Mozambique, Rwanda, Ethiopia
- Batch 3 (TBD): Honduras, Guatemala

The PoA was listed on 27/09/2023 along with its associated real and regular case VPAs (GS12322 and GS12078 respectively).

As per Gold Standard for Global Goals *Programme of Activity Requirements And Procedures, version 2.1, section 8.10 Registration of multi-country PoAs*, multi-country Voluntary PoA shall provide a real case VPA DD for each country considered at the time of PoA validation. Exceptions may be requested on a case-by-case basis following a Deviation request demonstrating all targeted communities within the PoA boundary are homogeneous with respect of Additionality, Baseline scenario, Emission reductions or other SDG Impact calculation, and Legislation applicable to the applied technology.

The project is submitting this deviation requesting to be granted with this exception to submit one real case VPA-DD (from one of the countries included in the PoA boundary) at the time of PoA Design Certification and subsequent real case/regular VPA(s) for the other countries to be included in the PoA at a later stage.

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.*

N/A

### 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):

Below is demonstrated that all targeted users within the PoA boundary are homogeneous with respect of Additionality, Baseline scenario, Emission reductions or other SDG Impact calculation, and Legislation applicable to the applied technology.

#### a. Additionality

In accordance with the *Community Services Activity Requirements, version 1.2, paragraph 4.1.9*, projects falling within the *Annex B – Positive list* are considered as deemed additional (regardless of the host country in which the project activity is being implemented) and therefore are not required to prove Financial Additionality at the time of Design Certification. All VPAs to be included under the PoA will be in compliance with this.

- For the component applying the *Methodology for Animal Manure Management and Biogas Use for Thermal Energy Generation V.1.1*, the following criterion listed in the *Annex B – Positive list* will be met:

*1.1.3 Project activities solely composed of isolated units where the users of the technology/measure are households or communities or institutions and where each unit results in  $\leq 600$  MWh of energy savings per year or  $\leq 600$  tonnes of emission reductions per year; and/or...*



*1.1.5 Project activities that involve technologies and/or practices providing thermal energy to the user that have less than 20% adoption rate among the target users.*

- For the component applying the Methodology *AMS-I.F.: Renewable electricity generation for captive use and mini-grid version 5.0*, the following criterion listed in the *Annex B – Positive list* will be met (the project activity is solely composed of off-grid electricity generation biogas generators delivering a maximum power of 10kW):

*1.1.2 The following mini-grid connected or off-grid electricity generation technologies where the individual units do not exceed the thresholds indicated in parentheses with the aggregate project installed capacity not exceeding the 15 MW threshold: o Micro/pico-hydro (with power plant size up to 100 kW); o Micro/pico-wind turbine (up to 100 kW); o PV-wind hybrid (up to 100 kW); o Geothermal (up to 200 kW); o Biomass gasification/ biogas (up to 100 kW).*

## **b. Baseline scenario**

All VPAs irrespective of the country of implementation will focus on smallholder farmers that have the following characteristics, ensuring the homogeneity of the targeted users:

- Have livestock (cattle and/or pigs, or similar); and,
- Typically rely on fuelwood, charcoal, or LPG for their energy needs both in the household and productive uses in the farm; and,

- Manage their manure partially in liquid form, in pits or in heaps with some content of moisture due to the mixing of urine and water<sup>1</sup>; and,
- The use of biodigesters has not been a common practice.<sup>2</sup>

The CME will perform a feasibility assessment to a country/region prior to being considered for a VPA implementation, which includes ensuring Manure management and fuel consumption practices stay homogenous within the PoA boundary irrespective of the implementation country.

Country specific baseline information for manure management and fuel consumption (for thermal applications, and electricity generation when applicable) at each VPA will be captured during the baseline survey diagnosis of each farm prior to the installation of a biodigester and will follow the recognized scientific sources (e.g., IPCC Guidelines for National Greenhouse Gas Inventories).

The full baseline survey database of each VPA will be available for review and verification.

---

<sup>1</sup> From the experience of other projects implemented by Sistema.Bio, it is expected that different treatment types (slurry crust, slurry no crust, uncovered lagoon, others) will be present within the project boundary. Each project will be adjusted according to what is determined by the baseline diagnosis.

<sup>2</sup> There may be a limited number of cases where an end-user who has a biodigester installed in their farm from another brand may want to purchase and install a Sistema.bio digester. Sistema.bio will not deny selling and installing a system in such cases because a user has the right to purchase the system, however, these will be excluded from the VPA to avoid potential double counting with overlapping activities.



Photos of typical manure management at baseline scenario

**c. Emission reductions or other SDG Impact calculation**

All VPAs will apply the Gold Standard *Methodology for Animal Manure Management and Biogas Use for Thermal Energy Generation, version 1.1*<sup>3</sup> for the component of Animal Waste Management System and Biogas for Thermal Applications.

The VPAs will apply the Methodology *AMS-I.F.: Renewable electricity generation for captive use and mini-grid, version 5.0*<sup>4</sup> for the component of Biogas for Electricity Generation, when applicable.

All VPAs will contribute positively to the same SDGs and follow the same approach.

*SDG contributions*

13 Climate Action	4 Quality education
2 Zero hunger	5 Gender equality
3 Good health and wellbeing	7 Affordable and clean energy
	8 Decent work and economic growth

#### **d. Legislation**

For each country listed in the PoA, research<sup>5</sup> on legislations was carried out on Biodigesters and Small scale off-grid electricity generation to ensure with confidence that all countries within the PoA boundary are homogeneous with respect of the legislation applicable to the applied technologies.

- Biodigesters

There are no laws, policies, and/or regulations mandating the installation and use of biodigesters on smallholder farmers and/or households within the countries of the PoA boundary. Countries like Kenya, Colombia, Rwanda among others, have programs supporting this type of activity and encouraging voluntary participation but are not mandating its implementation.

- Small scale off-grid electricity generation

---

<sup>3</sup> Or applicable version at the time of submission of Validation/Design Certification.

<sup>4</sup> Ibid.

<sup>5</sup> Research performed during November 2023.

Similar to biodigesters, there are no laws, policies, and/or regulations mandating the implementation of small-scale off-grid electricity generation within the countries of the PoA boundary. For example, Ethiopia support and incentivize small-scale generation but do not mandate its implementation. Kenya regulates small-scale off-grid electricity generation of sources creating up to 1MW, and Mexico do not incentivize nor forbid off-grid generation as long as it does not surpass the threshold of 0.5MW, both which are above the maximum power of 10kW electricity generation that can be achieved by this project biogas generators. Most countries promote and regulate the generation of renewable energy (projects mostly being large-scale and grid-connected) but do not cover small-scale off-grid electricity generation, which may be supported but do not mandated.

A summary of the research done on the legislations of each country is provided as a separate document named *Country-specific legislation to biodigesters and small-scale off-grid electricity generation*, shared along this deviation.

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.*

N/A

### 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):

This deviation will not impact the project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk, or any other relevant aspect of the project.



All VPAs within the PoA will be in compliance with relevant Gold Standard requirements.

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.*

N/A

**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.)*

- Country-specific legislation to biodigesters and small-scale off-grid electricity generation.

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