



TEMPLATE

# DEVIATION REQUEST FORM

---

PUBLICATION DATE **11.04.2021**

Version **5.0**

---

## A. To be completed by Gold Standard

### 1 | Decision

#### 1.1 | Date – dd/mm/yyyy

13/02/2024

#### 1.2 | Decision

The Deviation Request is not Approved.

In line with the Gold Standard VVS v1.0, p.17.4.5: The VVB shall confirm that

- a. monitoring periods have been consecutive.
- b. VPAs have been included in requests for issuance of ERs in a consecutive manner, that is, when a VPA has been included in a request for issuance of VERs for a monitoring period, the VVB shall confirm that a monitoring report for the previous monitoring period that included the particular VPA has been published.

The remaining Monitoring Period of CPI (from 01/05/2020 to 06/01/2021) cannot move to CP2, since CP2 starts from 01/07/2021. Hence shortening the CPI Monitoring period in order to continue with CP2 MP cannot be accepted, since the continuity is not maintained for the request for issuances.

**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_594	
Date of decision	13/02/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	14/12/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS2747
	<input checked="" type="checkbox"/> VPA	ID – GS2751
Project/PoA/VPA title	African Biogas Carbon Programme (ABC) – Tanzania-VPA02	
Date of listing	07/01/2016	
GS Standard version applicable	1.1	
Date of transition to GS4GG (if applicable)	11/07/2019 (date of last GS feedback)	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/a	
Date of design certification/inclusion (if applicable)	07/01/2016	
Location of project/PoA/VPA	Tanzania	
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://registry.goldstandard.org/projects/details/1645">https://registry.goldstandard.org/projects/details/1645</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project	
Title/subject of deviation	Shortening of VPA-02 crediting period I (GS2751) with 8 months and 5 days	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	There is no specific applicable rule.	
Specify the monitoring period for which the request is valid (if applicable)	Start date 07/01/2014	End date 06/01/2021

Submitted by	Contact person name: Kevin Kinusu & Eric Buijsman
	Email ID: <a href="mailto:kkinusu@kbp.co.ke">kkinusu@kbp.co.ke</a> & eric.Busyman@gmail.com
	Organisation: ABPL, CME of this PoA
	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 checked="" type="checkbox"/> No <input type="checkbox"/> DEV_237 (attached)

### 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):

VPA02's first crediting period expired on 6/1/2021. The CME is now in the process of renewing the CP. The PD is aware that credits from 7/1/2020 until design renewal cannot be claimed. However, a deviation request has been submitted for this and was approved. The evidence (DEV-237) is attached. Thus, the PD will claim credits from 7/1/2021.

In CP1, credits are claimed until 1/5/2020 and therefore 8 months and 5 days in the CP remain (until 1/6/2021, including the 6<sup>th</sup> of January). The CME wishes to monitor this remaining period, where possible combined with the first monitoring period of CP2. However, the survey requirements of the methodology applied in CP2: *methodology for*

animal manure management and biogas use for thermal energy generation (MAMMBUT) are radically different from the CPI methodology TPDDTEC v1.1, the survey sample for instance is at least 3 times larger, see the table below:<sup>1</sup>

Survey	TPDDTEC v.1.0	MAMMBUT v1.1
CP	1	2
User	>100	>100
Usage	>30 per age group. There are 7 age groups, thus a total of at least 210 hh	Usage data is collected in the user survey
Total sample size	>310 hh	>100

Organizing surveys for both CP's means surveying over 410 (>310+>100) households (+10-20% oversampling), which is given the relative small number of digesters in the project, 4,437 of which around 60% are estimated to be in operation<sup>2</sup>, rather expensive.

In this deviation request, the CME is requesting the GS to consider 2 possible option to overcome this conundrum:

- **Option 1: Shortening of CPI**

Shorten CPI so that CPII can start from 1/7/2021. By doing so, no MP remains in CPI, and the methodology of the CP2 can be applied for the monitoring of all units from 1/7/2021.

- **Option 2: Apply MAMMBUT monitoring approach for the last remaining MP in CPI**

Alternatively, applying the CPII methodology to monitor the remaining 8 months in CPI. However, according to SustainCert this is only possible with a design change not with a temporarily deviation<sup>3</sup>. The process of undergoing a design

---

<sup>1</sup> In the table '>' indicates that the actual sample will be larger to account for sample attrition and non-responsiveness (i.e. hh is not at home during time of the survey)

<sup>2</sup> 73% in 2020, drop-off rate is around 4%/year thus in the beginning of 2024 around 60% will be in operation

<sup>3</sup> A temporarily deviation would have been ideal for our case

change is both cumbersome and expensive, the VVB workload would increase, and it is likely 2 separate monitoring reports are required and verified. VVB's often charge double for this, cost thus are high.

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.*

**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 complies with the requirements because through shortening the CPI, the CP2 monitoring approach<sup>4</sup> will be applied and thus in summary:

- An updated methodology will be applied, which utilizes updated more conservative default values based on the latest scientific understanding, e.g. the IPCC 2019 guidelines instead of the IPCC 2006 revised guidelines and updated more conservative charcoal emission factors.
- Completeness and conservativeness is ensured by applying the latest approved methodology.

---

<sup>4</sup> VPA02-DD RCP has started mid-2023. The PoA-DD for CP2 is undergoing a design change to allow the use of MAMMBUT. The first round is concluded by SC.

- The SDG impact assessment will be replaced by the guidance offered in the SDG impact tool. This is a harmonized approach and will offer better comparison with other projects, completeness and compliance.

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.*

.....

**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 is no change in the project design, safeguard principles assessment or monitoring frequency. The emission reductions will be calculated using the latest methodology based on the most recent IPCC guidelines. These guidelines are based on the latest scientific understanding. The SDG impact assessment will follow the SDG impact tool, which is a harmonized approach developed by the GS.

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.*

.....



### 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.)*

- Dev\_237
- VPA02 CPI-DD

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