



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 – dd/mm/yyyy

29/02/2024

#### 1.2 | Decision

The deviation request is approved.

In this particular instance, the CME has been granted approval, taking into account that the validation site visit was conducted before the PoA and the VPAs are under Listed' status. For all subsequent cases of VPAs, the CME and the VVB shall ensure that to start the validation of PoA and real case VPAs that have achieved Listing Status in accordance with 8.2.9 and 8.3.2 of the Programme of Activity Requirements v2.0.

Any further deviations of this nature shall not be considered. CME and VVB shall include the decision in the relevant documents.

#### 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_618	
Date of decision	29/02/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	05/02/2024	
Project/PoA/VPA	Project	
	<input checked="" type="checkbox"/> PoA	ID – GS11598
	<input type="checkbox"/> VPA	
Project/PoA/VPA title	Distributed Emission Reductions by Bboxx Energy Solutions	
Date of listing	28/10/2022	
GS Standard version applicable	2.0	
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)	Not applicable	
Location of project/PoA/VPA	Democratic Republic of the Congo (DRC), Kenya, Nigeria, Rwanda, and Togo	
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		
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	Deviation for timing of validation start and project listing	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Validation may start after the project has achieved a "Listed Status". Considering final listing of the project was in 28/10/2022, please justify how on-site visit was conducted on 20/09/2022 by VVB for validation before the PoA achieved listing status and clarify how the process adhered to paragraph	

	<p>8.2.9 (c) and 8.3.2 of Programme of Activity Requirements</p> <p>Programme of activity requirements and procedures, version 2.0.</p> <p>Paragraph 8.2.9: With outcome (b. a successful Review with likely or potential CARs, FAR s or OBs identified but that are not required to be resolved prior to Listing) the PoA and its real case VPAs will obtain 'Listed' status in the Impact Registry. This means that: c. The CME may proceed to Validation.</p> <p>Paragraph 8.3.2 To start the validation of PoA and real case VPAs that have achieved Listing status, the CME shall: a. contract an approved VVB - eligible for the activity type and pathway proposed, and b. submit PoA and real case VPA documentation and supporting documents to the VVB.</p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>Start date <input type="text"/> End date <input type="text"/></p>
<p>Submitted by</p>	<p>Contact person name: Norio Suzuki – Focal Point CME Email ID: <a href="mailto:n.suzuki@bbox.co.uk">n.suzuki@bbox.co.uk</a> Organisation: Bboxx Ltd. 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 checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes. VVB name: Earthood Services Private Limited (ESPL)  VVB Staff name(s): Jahnabi Kalita. Validation Team Leader.</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> <p>DEV-443 GS11598 Request deviation of country batch proposal for multi-country PoA.</p>

## 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):

Bboxx Ltd is developing the Gold Standard PoA (GS11598) and real cases GS11600 and GS11893, already listed in the Gold Standard registry. This Programme of Activities aims to provide affordable, reliable, renewable, and clean energy services to the urban and rural populations in the Democratic Republic of the Congo, Kenya, Nigeria, Rwanda, Togo, and potentially other Sub-Saharan African countries. The programme activities consist of the distribution and installation of Bboxx Solar Home Systems (SHS), solar water pumps (SWP), and efficient LPG stoves to promote the efficient use of innovative technologies for reducing greenhouse gas emissions by replacing fossil fuel-based lighting and inefficient, traditional cookstoves, by bPower fixed solar devices and Flexx portable units, solar water pumps, and efficient LPG stoves, to be used in the rural and urban areas of the target countries for domestic and commercial, institutional and industrial applications at an affordable price.

During the Certification Design Review process, a Clarification/Corrective Action Request has been raised by SustainCERT, soliciting a Gold Standard deviation approval considering that the VVB site visit has been done before the PoA achieved listing status, which does not adhere to the requirement set by Programme of activity requirements and procedures, version 2.0, paragraphs 8.2.9 (c) and 8.3.2:

*8.2.9 (c) With either outcome (a) or (b) the PoA and its real case VPAs will obtain 'Listed' status in the Impact Registry. This means that: The CME may proceed to Validation.*

*8.3.2 To start the validation of PoA and real case VPAs that have achieved Listing*

*status, the CME shall: a. contract an approved VVB - eligible for the activity type and pathway proposed, and b. submit PoA and real case VPA documentation and supporting documents to the VVB.*

Therefore, Bboxx Ltd is seeking Gold Standard approval of deviation to these GS4GG requirements to permit start of Validation, with site inspection process, before achieving listing status. Bboxx aims to demonstrate that the VVB (ESPL) had all project activity data available and context, including technologies, localization, host country conditions, and relevant project activity documentation, to develop the site inspection, and therefore undertaking the site visit prior to the PoA achieving listing status did not have a material impact on the Validation process.

The main considerations to start the validation process without having the complete listed process have been the following:

1. First submission to SustainCERT for preliminary review of the Programme Activity POA GS11598 was on 25/03/2022, and the first SustainCERT Preliminary Review response was received on 11/07/2022. In the meantime the CME began contracting and planning validation with the VVB, with the objective not to delay certification further and with an expectation of when Listed status would be achieved.
2. Defining a successful validation site visit date for such a retroactive Program of Activities (and associated VPAs) in Rwanda required overcoming several difficulties and challenges. The main issue was the geographical dispersion of the participants in the site inspection (Auditors - India, CME representative - UK, Consultants – Kenya, Local Representative, and diversion of persons into isolated regions- host country). Although the COVID-19 regimen<sup>1</sup> at the time of the site visit date has been under gradual easing of restrictions, there were limitations in terms of international travel, passengers' health conditions, connections, and high travel costs. Rescheduling the site visit for another date would have significant impacts on validation timeline and retroactive crediting

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<sup>1</sup> The GS COVID 19: INTERIM MEASURES version 6 was valid up to 31/12/2022

period, so it was determined that there was no other option but to conduct the visit during the available period.

3. The CME focused on guaranteeing minimum conditions to comply with the mandatory site inspection during the validation process (paras 3.2 & 8.3.4 Programme of Activity Requirement, version 2.0). As a result, it was necessary to develop the site visit on different days, with the presence and participation of the ESPL auditor, Rwanda Bboxx representative, and virtual participation of the CME representative and consultants. ESPL found, during this chosen period, all the conditions to correctly develop the site inspections.
4. The VVB (ESPL) and CME agreed to develop the site inspection considering the following points:
  - a. The project data provided were sufficient and relevant to the project activities, technologies employed, host country conditions, and the main ER assumption and calculations to assess the up-front design and monitoring plan during the site inspections.
  - b. As it can be checked with the ESPL Onsite Validation Plan 19/09/2022, the Site Visit was planned with two different stages. The first stage of the site visit took place on 20/09/2022 to check details about the project activities, localization, technology, baseline confirmation, additionality, local stakeholders, and other relevant issues. By this date, the ESPL was already in possession of the Preliminary Review findings and detailed conditions of the CARs, FARs, or OBs raised by SustainCERT, and considered that none of those involved critical aspects of the GS Eligibility Principles.
  - c. The second stage focused on interviewing the end-user's conditions and other contingencies during the dates 30/09/2022 and 01/10/2022 for LPG stoves users; and from 08/10/2022 to 10/10/2022 to SHS users.
  - d. From the Preliminary Review assessment results, it was clear that the remaining comments were more administrative and procedural, and the adjustments needed would not represent a risk for the certification cycle, project implementation, technology, ER, double counting, E & S safeguarding, or VPAs overlaps.
  - e. The CME response to the Preliminary Review second round was made on 01/10/2022, when SustainCERT proceeded to final approval.

In summary, the CME was able to fit, in the chosen window of time, all needed aspects for the successful site visit that may not have been possible to encounter if the site visit were postponed. Furthermore, this PoA and the first VPAs were developed during COVID pandemic times, which added complexity.

Since the first round of findings from the Preliminary Review did not involve major issues, it was decided to proceed with validation and site visit arrangements since this PoA already had experienced delays during the Preliminary Review and it involved retroactive activities that were ongoing. The best period was defined to be in the end of September 2022. Neither the CME nor the VVB expected to have major issues moving forward and Listing could have been achieved by that time.

Although the second round of Preliminary Review assessment was even more straightforward, it enabled the validation team to check all the necessary context during the end-user's condition. The decision was made with the best intention in mind to have the best and most compliant validation site visit possible.

The key dates of Listed Approval process were the following:

- First GS submission for preliminary review of the Programme Activity POA GS11598 was on 25/03/2022.
- The first SustainCERT Preliminary Review response was on 11/07/2022, which was responded by CME on 10/08/2022.
- *The first stage of the Validation site visit took place on 20/09/2022 to check details about the project activities, localization, technology, baseline confirmation, additionality, local stakeholders, and other relevant issues.*
- The second round SustainCERT response was 21/09/2022, responded on 01/10/2022.
- *The second stage of the Validation site visit focused on interviewing the end-user's conditions and other contingencies during the dates 30/09/2022 and 01/10/2022 for LPG stoves users; and from 08/10/2022 to 10/10/2022 to SHS users.*
- The Listing status was obtained on 13/10/2022 POA GS11598, 27/10/2022 GS11893 VPA2 and lastly 28/10/2022 GS11600 VPA1.

Other relevant information in support of the deviation request are the following:

- ESPL Onsite Validation Plan Sep 2022.pdf
- Closure of the Review GS11598, GS11600 & GS11893

Similar discussion and justification have been included during the responses of Design Review.

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.*

VVB would like to confirm the above requested deviation by CME for initiating validation before project achieved 'listed' status, which is deviation from requirements stated in para 8.2.9 (c) and 8.3.2 of PoA Requirements and Procedure, version 2.0. VVB would like to following points to be considered, reiterating the argument provided above by CME:

- a. The site visit was initially planned with expectation that all preliminary findings to be closed by the time site visit will be conducted considering the nature of findings. The onsite visit was undertaken by the VVB assessment team on 20/09/2022 which is 23 days before the listing status was obtained. This period was covered under Covid Interim measures in place and to accommodate for a logistical challenge in international travel, a site-visit had to be undertaken while VVB team was also travelling for two other assignments to the region.
- b. However, to mitigate any risk in assessment due to this noncompliance the assessment team reviewed the issues remaining pending from the first round of preliminary review and addressed the FARs raised once the closure was obtained.
- c. VVB would like to further highlight that the findings raised by SustainCERT during the Preliminary Review were mostly related to check compliance with PoA DD/VPA DD template guidelines and Stakeholder Consultation meetings. Hence, the findings from the Preliminary Review had no significant impact on the aspects that are reviewed at the time of the onsite visit.
- d. VVB would like to highlight that all project related documents were shared by CME before site visit was conducted, including the ongoing and open preliminary review findings, thus ensuring that VVB was aware of the open findings which were considered for assessment during site visit.



- e. VVB would also like to reiterate that during site visit, all site visit requirements were met by the assessment team in line with "SITE VISIT AND REMOTE AUDIT REQUIREMENTS AND PROCEDURES", version 1.0 which was the applicable document for site visit rules at the time.
- f.

### 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 CME ensured that the validation site visit before the PoA achieved listing status did not have any negative impact, direct or indirect effect over GS principles.

**Environmental integrity:** the VVB, as part of the validation activity, checked the integrity of monitoring plan, the technologies implemented and the project activity implementation status in Rwanda. The deviation does not consider aspects or components related to the emission reduction calculation or further changes in design, assumptions or monitoring plan.

**Contribution to the Sustainable Development Goals (SDGs):** the deviation request does not aim to change, modify, or compromise the SDGs project activity contribution defined in the PoA and VPAs design documents. (i.e., affordable clean energy, decent work and economic growth and climate action).

**Safeguarding principles and requirements:** the result of the deviation request does not impact the conditions of the safeguarding principles or requirements. The monitoring plan is not being changed.

**Compliance with host country regulations:** the deviation request has no relation with host country regulation and do not generate any type of conflict with the local legal framework. All applicable Host Country's legal, environmental, ecological, and social regulations keeps in same conditions.

The CME confirms this deviation request complies with all deviation requirements according to the following:

1. The deviation submission consists of requesting a deviation approval of the Gold Standard for the Global Goals (GS4GG) requirements according to the paragraphs 8.2.9 (c) and 8.3.2 of the Programme of Activity requirements and procedures v.2.0.
2. The deviation does not refer to clarification for Global Goals (GS4GG) Requirements and SDG Impact Quantification methodologies/or applicable methodology.
3. The CME provides all required documents, data and/or send notification to SustainCERT at [help@sustain-cert.com](mailto:help@sustain-cert.com).
4. The request does not involve any actual or proposed temporary changes to the implementation, operation or monitoring of the certified project activity.
5. It is not necessary to propose any alternative monitoring arrangements, since the deviation request does not change assumption or claim different values applicable for emission reduction calculation. Therefore, there is no need for applying a conservative approach.
6. The deviation request has no relation with monitoring plan or monitoring report.

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.*

VVB would like to confirm that the deviation has no impact on accuracy, completeness and conservativeness of the project and emission reduction calculations. The deviation is solely from the GS PoA Requirements and Procedure, version 2.0, paragraph 8.2.9 (c) and 8.3.2, which require listing of project to be completed before initiating project validation. As described above in sections 3.1.1 and 3.1.2, since the Preliminary review findings did not have an impact on the aspects primarily validated during the assessment (methodology applicability, eligibility criteria, additionality, certification cycle, project implementation, technology, ex-ante ER estimation, double counting, environment and sustainability safeguarding, or VPAs overlapping).

### 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):

The deviation will not impact project design, safeguarding principles, SDGs assessment, ERs, monitoring frequency, data quality or any other potential risk, as this is an *ex ante* deviation, requested before the PoA design certification.

Each VPA submitted for design certification within the PoA will be following the relevant Gold Standard eligibility criteria, and the inclusion conditions of each one of the VPAs will be met in which it is verified that all the conditions are uniform and under the same conditions.

#### 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.*

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VVB would like to confirm that the deviation will have no impact on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project.

Since the deviation is only related to initial registration of the project, it will have no impact on future design certifications and performance certifications.

### 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.)*

- Programme of activity requirements and procedures, version 2.0  
<https://globalgoals.goldstandard.org/107-par-programme-of-activity-requirements/>
- Deviation approval requirements and procedures, Version 1.2  
<https://globalgoals.goldstandard.org/110-par-deviation-approval-procedure/>
- Rule Update COVID-19:Interim Measures, version 6.  
<https://globalgoals.goldstandard.org/ru-2022-covid-19-interim-measures-update/>

We kindly request that the following list of document will be treated as confidential,

- ESPL Onsite Validation Plan Sep 2022.pdf
- VVB LPG stoves customer visit record Sep 30 - 01 Oct
- VVB SHS customer visit record 10 Oct
- VVB SHS customer visit record 08 and 09 Oct
- VVB LPG stoves customer visit 08 Oct

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
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