



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

05/03/2024

1.2 | Decision

The Deviation request is approved, since the reason for delay in submission of the preliminary review documents was beyond the control of the CME. The decisions of the regulations in the host country and subsequent incidents and thereby the communication, could be accepted as valid reason for the delay.

The project is granted deviation from para 4.1.49.(b) of the Principles & Requirements – Gold Standard for the Global Goals. The project may proceed for listing and design certification provided that project is in compliance with other applicable requirements.

The validating VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above-mentioned conditions and provides its opinion in the Validation Report.

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_630	
Date of decision	05/03/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	22/02/2024	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Southern Africa Clean Cookstove Initiative (SACCI) PoA	
Date of listing	N/A	
GS Standard version applicable	4.0	
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	Zimbabwe, Mozambique, Malawi, Zambia, South Africa, Botswana	
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	N/A	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Deviation from the Gold Standard requirement on submission of PoA documents for preliminary review within 1 year of VPA Start Date	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	GS 101: Principles & Requirements, version 1.2 Para 4.1.49 Prior Consideration (b)	
Specify the monitoring period for which the request is valid (if applicable)	Start date	End date

Submitted by	Contact person name: Ajay Dixit
	Email ID: developer@sacci1.com
	Organisation: SACCI1 Limited
	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 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):

The GS 101: Principles & Requirements, version 1.2, Para 4.1.49 Prior Consideration (b) states that *“Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date. Retroactive Project submitted at a date later than one year from the project start date will not be eligible for Gold Standard certification.”*

The VPA01 of the Southern Africa Clean Cookstove Initiative (SACCI) PoA was implemented on 27 June 2022. Due to decisions pending at Gold Standard and the host country DNA, CME was unable to submit the PoA & VPA for preliminary review. Following is the chronological account of reasons that led to the delay in CME fulfilling the aforementioned GS PAR requirement:

1. In the third week of May 2023, Zimbabwe DNA suspended¹ the Carbon projects to operate amid speculations of greenwashing and increase their intervention thus acting as a regulatory body to the projects operating in the country.
2. Post this, Gold Standard paused² the registration and issuance of requests for projects from the host country Zimbabwe on 11 July 2023.
3. On 18 August 2023, Zimbabwe DNA released their statutory instrument (regulations³) to regulate Carbon markets in the host country.
4. Following a series of conversations with Gold Standard executives on this matter, on 29 January 2024, GS (Mrs. Claire Willers) responded to our request, where we were seeking clarity on the submission of our PoA's registration and issuance request. She advised us that we can either submit a deviation request to GS for further clarity on this request, or we don't include the Improved Cookstoves (ICS) that were distributed earlier than 1 year from the date of submission of preliminary review request.
5. The mail from GS provided CME with clarity on this, and for the same reason, this deviation request submission is being made to the GS against the deviation from the GS PAR requirements.

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

¹ <https://www.reuters.com/world/africa/zimbabwe-regulate-carbon-credit-market-curb-greenwashing-2023-05-23/>

² <https://www.bloomberg.com/news/articles/2023-07-11/gold-standard-pauses-issuance-of-co2-credits-from-zimbabwe>

³ <https://www.veritaszim.net/node/6534>

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 assessment by the CME leads to the following:

1. The deviation from the GS requirements is not deliberate in nature. The delay from CME were a consequence of the delays from the host country Zimbabwe DNA and GS opinion on resuming the registration and issuance of projects being implemented in Zimbabwe.
2. The deviation is not repetitive in nature. The delay for real case VPA01 accompanying the PoA would not impact the VPAs to be added later to the PoA.
3. The deviation, in no way, is leading to an increase in the estimation or quantification of ERs for the VPA01.
4. CME is unable to keep the Improved Cookstoves installed 1 year before the start date from being included under VPA01 for crediting. The main reason behind CME's inability to perform such an action is the Carbon Finance. The VPA01 was planned with Carbon Finance as its sole medium of earnings. The ICS units were installed at beneficiary homes without any charges or fees imposed on them, and were provided completely for free.

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):

If the ICS units distributed under VPA01 does not get through the deviation approval process, and are denied inclusion into the VPA, then the scale-up of the programme will be halted, as the lack of any finances at CME end will depict this initiative as financially unattractive to the prospect VPAIs, and consequently will stop any further funding.

The CMEs vision to transform the Southern African nations present in the PoA with clean cooking solutions will be severely impacted, and will diminish the opportunities where rural households are expected to be benefited by clean cooking at no cost.

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.)*

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
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