



# 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 – 06/03/2024**

**1.2 | Decision**

The deviation is approved.

The request demonstrates valid reason for non-compliance with site visit requirements, as required by RU APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB.

PD shall document the decision in the Monitoring 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_635	
Date of decision	06/03/2024	
Precedent (YES/NO)	No	
Precedent details		
Date of submission	29/02/2024	
Project/PoA/VPA	Project	ID – G11729
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Agasco Improved Cookstoves Nigeria	
Date of listing	06/10/2022	
GS Standard version applicable	GHG Emissions Reductions & Sequestration Product Requirements Version 2.0 GS2GG Principles & Requirements Version 1.2	
Date of transition to GS4GG (if applicable)		
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)		
Date of design certification/inclusion (if applicable)	14/07/2023	
Location of project/PoA/VPA	Nigeria	
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/3734">https://registry.goldstandard.org/projects/details/3734</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Remote Site Visit	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Site Visit and Remote Audit Requirements and Procedures Version 2.0 para 3.1.1, para 3.2.2 Principles & Requirements Version 1.2 para 5.1.26 Applicability of Minimum Site Visit Requirements by VVB para 2.1.1.A	
Specify the monitoring period for which the request is valid (if applicable)	Start date 10/01/2023      End date 10/01/2024 (inclusive of first and last date) (First Verification / Performance Review)	

Submitted by	Contact person name: Chelsea Woodruff
	Email ID: chelsea.woodruff@agasco.com
	Organisation: Agasco
	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 checked="" type="checkbox"/> No <input type="checkbox"/>  If yes; VVB name: Earthood  VVB Staff name(s): Sushant Vashisht
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):

As per Site Visit and Remote Audit Requirements and Procedures version 2.0 para 3.1.1, at minimum, the VVB shall conduct physical site visit within two years of project start date. Para 3.2.2, a physical site visit by VVB is mandatory at the first verification of a project.

As per para 5.1.26 of Principles & Requirements V 1.2, verification includes a site visit by a VVB who assesses the monitoring report and all supporting evidence and documents.

According to Applicability of Minimum Site Visit Requirements by VVB, para 2.1.1.A, Force-Majeure, an event beyond the control of the project developer and not involving the developer’s fault or negligence and not foreseeable, may result in non-compliance with site visit requirements.

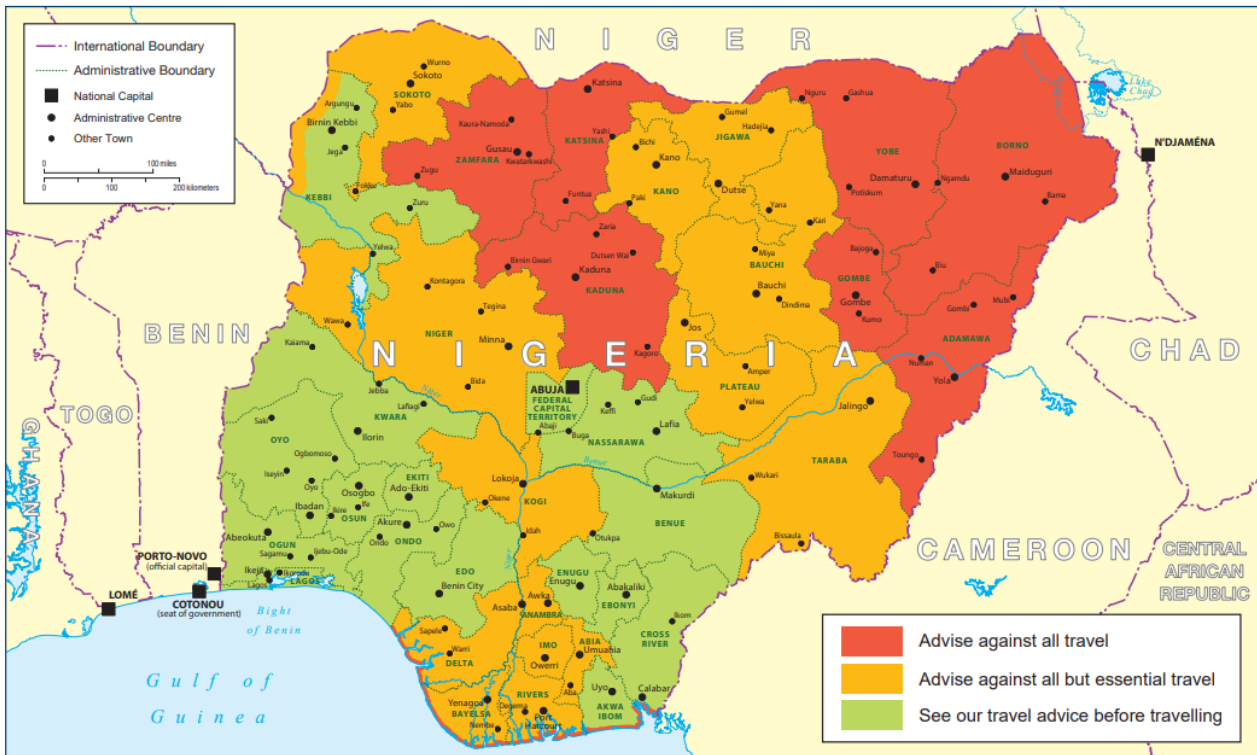
Therefore, a deviation to address a non-compliance with the minimum site requirement is requested due to safety concerns of persons travelling to Nigeria. Whilst the PDD includes the northern states of Bauchi, Borno, Gombe, Taraba and Yobe, the deviation request corresponds to the States of Bauchi and Taraba where the project activity has been implemented in 2023 during this monitoring period.

Travel advisories from the United Kingdom Foreign, Commonwealth & Development Office, the United States Department of State Bureau of Consular Affairs, and Switzerland Federal Department of Foreign Affairs – to Nigeria is not advised due to crime and high risk of kidnapping.



Foreign, Commonwealth & Development Office

### Nigeria: Travel Advice



Please note Briefing Maps are not to be taken as necessarily representing the views of the UK government on boundaries or political status. This map has been designed for briefing purposes only and should not be used for determining the precise location of places or features, or considered an authority on the delimitation of international boundaries or on the spelling of place and feature names. FCDO (TA) 030 Edition 8 (October 2023) ©Crown Copyright 2023

Source: Foreign, Commonwealth & Development Office (FCDO). October 2023.

<https://www.gov.uk/foreign-travel-advice/nigeria>

## Areas where FCDO advises against travel

**!** Your travel insurance could be invalidated if you travel against FCDO advice.

### North East Nigeria

FCDO advises against all travel to:

- Borno State
- Yobe State
- Adamawa State
- Gombe State

FCDO advises against all but essential travel to:

- Bauchi State
- Taraba State

The screenshot shows the header of the Travel.State.Gov website. It includes the U.S. Department of State logo, the text "Travel.State.Gov" and "U.S. DEPARTMENT OF STATE — BUREAU OF CONSULAR AFFAIRS". Below this is a dark blue navigation bar with white text for "U.S. Passports", "International Travel", "U.S. Visas", "Intercountry Adoption", "International Parental Child Abduction", and "Replace or Certify Documents". At the bottom left of the screenshot, there is a breadcrumb trail: "Travel.State.Gov > Travel Advisories > Nigeria Travel Advisory". At the bottom right, there is a "Share this page" link.

### Nigeria Travel Advisory

The screenshot shows the Nigeria Travel Advisory page. At the top, it says "Travel Advisory September 20, 2023" and "Nigeria - Level 3: Reconsider Travel" with a C T U K O rating. The main text states: "Updated with return to full operational status, removal of obsolete COVID-19 page links, and updates to Do Not Travel Areas. Reconsider travel to Nigeria due to crime, terrorism, civil unrest, kidnapping, and armed gangs. Some areas have increased risk. Read the entire Travel Advisory." It lists "Do Not Travel to:" areas: Borno, Yobe, Kogi, and northern Adamawa states due to terrorism and kidnapping; Bauchi, Gombe, Kaduna, Kano, Katsina, Sokoto, and Zamfara states due to kidnapping; and Abia, Anambra, Bayelsa, Delta, Enugu, Imo, and Rivers states (with the exception of Port Harcourt) due to crime, kidnapping, and armed gangs. It also includes a "Country Summary" section detailing violent crime, kidnappings, and terrorism in Nigeria.

The screenshot shows the "Travel Advisory Levels" section with four levels: 1. Exercise normal precautions (blue), 2. Exercise increased caution (orange), 3. Reconsider travel (yellow), and 4. Do not travel (red). Below this is the "Assistance for U.S. Citizens" section, which provides contact information for the U.S. Embassy in Abuja, including the address (1075 Diplomatic Drive, Central District Area, Abuja, Nigeria), telephone number (+234 209 461 4328), emergency number (+234 209 461 4000), and email address (AbujaACS@state.gov).

Source: United States Department of State, September 2023.

<https://travel.state.gov/content/travel/en/international-travel/International-Travel-Country-Information-Pages/Nigeria.html>

**Northern half of the country: Travel to the states of Kaduna, Zamfara, Sokoto, Katsina, Kano, Jigawa, Bauchi, Gombe, Adamawa, Borno and Yobe is not recommended. Tourist and other non-urgent trips to the other states in the northern half of the country (Kebbi, Niger, Taraba) are not recommended.**

**Violent clashes** continue to break out in several northern states and have already claimed thousands of lives. People were regularly killed or injured in explosive attacks and armed attacks by terrorist groups. The security forces have massively increased their presence where they still exercise control. Further attacks are to be expected.

The **risk of kidnapping** for local and foreign people is very high in the northern half of the country. Examples of kidnappings and attacks:

Source: Switzerland Federal Department of Foreign Affairs (FDFA). December 2023

<https://www.fdfa.admin.ch/countries/nigeria/de/home/reisehinweise/vor-ort.html>

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.*

In the VVB's opinion, as outlined in Site Visit and Remote Audit Requirements and Procedures version 2.0, paragraph 3.1.1 stipulates that a physical site visit should be conducted within two years of the project start date. Additionally, according to paragraph 3.2.2, a mandatory physical site visit by the VVB is required for the first verification of a project.

As reflected in paragraph 5.1.26 of Principles & Requirements V 1.2, the verification involves a site visit where VVB assesses the monitoring report along with all supporting evidence and documents.

The VVB believes, as per Applicability of Minimum Site Visit Requirements, paragraph 2.1.1.A, acknowledges that unforeseeable events beyond the control of the project developer, such as Force-Majeure, may lead to non-compliance with site visit requirements.



Therefore, VVB requests a deviation to address non-compliance with the minimum site visit requirement, emphasizing safety concerns for individuals traveling to Nigeria, specifically in the States of Bauchi and Taraba where the project has been implemented in 2023 during this monitoring period.

Considering security advisories by the High commission of India<sup>1</sup>, United Kingdom Foreign, Commonwealth & Development Office, the United States Department of State Bureau of Consular Affairs, and Switzerland Federal Department of Foreign Affairs, the VVB holds the opinion that traveling to Nigeria is not advised due to ongoing agitations in southeast and also the high risk of crime and kidnapping.

### 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.*

Due to the safety concerns highlighted by the travel advisories of the United Kingdom, United States and Switzerland travelling to Bauchi and Taraba, a remote site visit with interviews conducted via phone call with end users to complete the household audit is requested.

As per Site Visit and Remote Audit Requirements and Procedures version 2.0, the project developer shall request a remote audit, and the VVB shall assess the feasibility of a remote audit according to current site visit requirements. The VVB will then decide whether to conduct a remote audit or use any remote audit techniques.

All planning, scheduling, and carrying out of the hybrid remote audit will be done in line with para 6.4 of Site Visit and Remote Audit Requirements and Procedures version 2.0

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<sup>1</sup> High commission of India, Abuja, Nigeria: - <https://hciabuja.gov.in/listarchview/OTI>

As per para 2.C, remote audit techniques include phone calls, video calls, video recordings, geological data and geoinformation systems, etc. They may be used in remote audits as well as in audits involving a physical site visit.

Therefore, the deviation of a remote site visit with interviews conducted via phone calls with end users complies with the requirements of the Site Visit and Remote Audit Requirements and Procedures V 2.0.

### 3.2.1 | Deviation assessment (to be completed by Project developer):

Due to travel advisory from Swiss FDFA and UK FCDO advising against all but essential travel to Bauchi State and Taraba State, as well as the United States State Department listing Bauchi State as level 4 Do Not Travel to due to kidnapping and other safety concerns, this deviation request has been assessed to be necessary to ensure the safety of all persons taking part in the verification site visit.

### 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.*

In consideration of travel advisories issued by the High Commission of India, the Federal Department of Foreign Affairs (FDFA), and the UK Foreign, Commonwealth & Development Office (FCDO) advising against non-essential travel Bauchi State, in addition to the United States State Department's designation of Bauchi State and Taraba State, as level 4 Do Not Travel areas due to risks including kidnapping and other safety concerns, the deviation request has been formulated to prioritize the safety and well-being of all participants involved in the verification site visit.

### 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 have a negative impact on project design, safeguarding principles assessment, SDG assessment, emission reductions, monitoring frequency, data quality, potential risks or any other relevant aspect of the project.

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.*

**Risk associated to the non-conduction of mandatory physical on-site inspection for verification.**

Sr. No	Identification of potential risks	Mitigation measures	Risk Mitigated
1.	Risk associated to verify project implementation and operation with respect to the registered/included documents (PDD/PoA DD, CPADD)	<p>During remote interviews by means of using audio/video call (as feasible) and real time photographs at the time of remote inspection, the name plate which includes capacities/unique ID can be checked. Cross checking the same through other relevant documents such as statutory clearances &amp; project database.</p> <p>Logbooks/grievances mechanism book can be checked remotely at the head office of Roshan Renewables, either synchronously (in real time) or asynchronously (when applicable) can also be checked by Remote audit at the head office.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
2	Risk associated to verify implemented monitoring plan with the registered/included documents (PDD/PoA-DD, VPA-DD) and applied	This risk can be mitigated by conducting remote interview via audio/video call with end users to cross check the Monitoring parameters described in the registered PDD. Additionally, the documents will be cross checked during the Remote audit at the head office of Agasco Ltd/ Roshan Renewables by the Audit team.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO

3	Risk associated to verify that the actual monitoring systems and procedures comply with the monitoring systems and procedures described in the monitoring plan.	This risk can be mitigated during remote interview video call/video recording/a real time photo of the monitoring equipment along with make and model, to check whether calibration of each of the measuring equipment is done at intervals specified in the registered document (PDD/PoA-DD/VPA-DD). Remote Interview will be conducted at Agasco. Ltd/Roshan renewables head office with the relevant personnel to ensure that the calibration procedures are being followed as per the registered monitoring plan.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
4	Risk associated to evaluate the GHG emission reduction data and express a conclusion with a reasonable level of assurance on whether the reported GHG emission reduction data is free from material misstatement.	The identified risk can be mitigated by managing access to the records during audio/video with Roshan renewables & Agasco. It can be verified whether a project has adequate controls related to data changes/updates, version tracking, traceability, security and weather data is reproduceable from the sample sheet. Furthermore, data quality control personnel can also be interviewed remotely to establish the level of assurance.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
5	Risk associated to verify that reported GHG emission data is sufficiently supported by evidence.	The identified risk can be mitigated during remote interview by asking for a complete set of data for the monitoring period and information provided in the monitoring report can be cross-checked with other sources such as electricity/heat sales receipts/logs. To check weather, calculations of baseline emissions and emission reduction have been carried out in accordance with the formulae and methods described in the monitoring plan and the applied methodology. Furthermore, appropriate/correct emission factor value has been applied or not.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO

6	Any outstanding FAR(s)/pending issue (s) since the previous physical site visit.	The identified risk is mitigated by reviewing the validation report and found that no FAR is raised during the design review.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
7	Any gaps in monitoring data, if any, that cannot be justified as per applicable requirements.	As per the shared data no such gap exists for the proposed monitoring period as this is the first verification of the project.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
8	Any design changes(s)/temporary deviation(s) since the previous physical site visit.	The identified risk is mitigated by reviewing the validation report and found that design change is not available.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
9	Sustainable development goals targeted under the project activity	As per the registered PDD, there are 8 SDG claimed & validated by the VVB. The identified risk is mitigated by reviewing the validation report and supporting evidence which will be crosschecked during the Remote Audit to the head office of Agasco Ltd & Roshan renewables.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO

VVB believes, it is opined that the deviation will not adversely affect the project design, assessment of Implementation of the project, safeguarding principles, evaluation of Sustainable Development Goals (SDGs), attainment of emission reductions, frequency of monitoring, data quality, potential risks, or any other pertinent aspect of the project.

### 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"> <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