



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

22/07/2024

1.2 | Decision

The Deviation Request is Not Approved.

CME shall refer to the relevant scenario under Rule Clarification-2023: DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG for the renewal of VPAs transitioning from CDM. CME shall follow the due process for transition and shall request the CP renewal. This has not been followed for few VPAs. CME shall also refer to Design Change Requirements v1.1 to change the start date of CP.

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

Our PoA and our projects was registered under CDM. The PoA and the VPAs was transferred to Gold Standard. There is believed to be faults in the registered crediting period for the PoA and it was not possible to renew the crediting period for these projects in time for the projects to under Gold Standard, partly due to Covid 19 and partly because the projects was listed under Gold Standard so late that it was not time to complete a renewal of the crediting period before the previous crediting period expired.

We seek a deviation request that will allow us to change the crediting period of the PoA and the VPAs referred to in this document.

Deviation Reference Number	DEV_701	
Date of decision	22/07/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	08/05/2024	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS11574
	<input checked="" type="checkbox"/> VPA	ID – GS11717 ID – GS11693 ID – GS11692 ID – GS11691
Project/PoA/VPA title	<p>PoA for the Reduction of emission non-renewable fuel from cooking at household level</p> <p>CPA-MA-25-Madagascar Ethanol Stove Program CPA-MA-28-Madagascar Ethanol Stove Program CPA-KE-012-Kenya Samsung Project CDM-KE-011 Kenya EcoEye Mombasa Project CPA-KE-010-Kenya Samsung Mombasa Project</p>	
Date of listing	<p>27/09/2022 (GS11574) PoA 26/12/2023 (GS11717) 19/09/2023 (GS11693) 19/09/2023 (GS11692) 19/09/2023 (GS11691)</p>	
GS Standard version applicable	AMS-I.E., Version 12.	
Date of transition to GS4GG (if applicable)		
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	<p>Creation Date 07/03/2022 (GS11574) PoA 14/06/2022 (GS11717) 29/05/2022 (GS11693) 29/05/2022 (GS11692) 29/05/2022 (GS11691)</p>	
Date of design certification/inclusion (if applicable)	<p>17/01/2023 (GS11574) PoA 27/10/2023 (GS11717) 10/01/2023 (GS11693) 21/07/2023 (GS11692) 04/08/2023 (GS11691)</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):

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We have some challenged with the crediting period for our PoA and some of our VPAs. Our PoA was initially registered under CDM, with a 7-year crediting period that started on 30/11/2012. The start date of the crediting period of the fist CPA under our PoA was from 01/01/2013.

The first CPA that was registered with the PoA was however never implemented and was formally withdrawn from the program. The formal exclusion date was 27/05/2016.

The first CPAs that was registered and implemented as part of the PoA was registered with the start of the crediting period of 28/05/2014.

The CDM PoA had a 7-year PoA period and from 30/11/2012 to 29/11/2019. The PoA period was renewed under CDM and the second PoA period under CDM was from 30/11/2019 to 29/11/2026.

In 2022 we started the process of transferring the PoA from CDM to Gold Standard. The Gold Standard ID of this PoA is GS11574, and in the project information page on the SustainCERT app it is registered with a Creating date of 07/03/2022, with a listing date of 27/09/2022, a Registration /Design Certification date of 17/01/2023 and with a crediting period from 28/05/2019 to 27/05/2024.

Based on the above, the crediting period for the PoA ends on 27/05/2024, and we have hence requested a VVB to validate the renewal of the PoA period under Gold Standard. But in this process, we have run into issues with the crediting period, which is understood to be incorrect.

In accordance with the Gold Standard rules, GS4GG Programme of Activity Requirements and Procedures v.2.1 paragraph it is stated that "The PoA crediting cycle start date is the crediting period start date of the earliest VPA Included in the PoA. It is understood that the renewal of the crediting period of the PoA is done together with the renewal of a VPA. This is of course not possible for the renewal of our PoA as there is no VPAs that needs to be renewed at the same time as the PoA.

During a training session with SustainCERT we were informed that the crediting period for projects (and PoA) transferred could have a crediting period of more than 5 years under Gold Standard if the projects (or PoA) was transferred from CDM to Gold Standard at the end of the crediting period. It is of course understood that the total crediting period could not exceed 7 years and the crediting period under Gold Standard, may not exceed 5 years. We have asked SustainCERT for a copy of the presentation in which this rule was presented during the training session and clarification on these rules but have so far not received neither the clarification not the copy of the presentation. Due to the urgency of this issue (end of Crediting period), we are now seeking deviation request approval from Gold Standard.

1. We request that approval for the Gold Standard crediting period for our PoA to be extended to 27/05/2026.

Justification for this request.

- This is the end of the second crediting period for the first projects registered under our PoA. These projects had the first crediting period under CDM from
 - First crediting period 28/05/2014 to 27/05/2021 (7 years under CDM).
 - 2. crediting period from 28/05/2021 to 27/05/2026 (5 years under GS).
- The PoA period, in which projects may be included under Gold Standard will be less than 5 years.

- The covid-19 pandemic prevented us from expanding and registering any new projects during the start of the second crediting period. Extending the end of the second crediting period under Gold Standard would therefore reduce the cost to our project caused by the Pandemic, without any cost to anyone and without any risk to the integrity or reputation of the Gold Standard.

2. Request for change to the end of the crediting period for the 4 projects under our PoA.

Project	Creation Date	Design Certified	Start CP	End CP	Proposed new and CP
GS11717	14/06/2022	27/10/2023	03/08/2016	02/08/2021	02/08/2023
GS11693	29/05/2022	10/01/2023	15/03/2018	14/03/2023	14/03/2025
GS11692	29/05/2022	21/07/2023	01/11/2017	31/10/2022	31/10/2025
GS11691	29/05/2022	04/08/2023	01/11/2017	31/10/2022	31/10/2025

All projects were submitted to Gold Standard for Preliminary review during the last two years of the CDM Crediting period.

Justification for the new end of Crediting period for these projects.

1. Renewal of the crediting period under Gold Standard by these projects was not possible to complete by the end of the Gold Standard Crediting period, both due to the crediting period ending before the PoA was Design Certified and because of covid-19.
2. No projects will earn carbon credits under Gold Standard for more than 5 years.
3. The Covid-19 pandemic prevented us to carry out new baseline surveys in time for renewal of the projects under Gold Standard. Baseline survey and VVB validation site visit for both Kenya and Madagascar (the countries in which these projects are implemented) was completed in May 2023. It was not possible to have validation site visit earlier, both due to Covid-19 and because the PoA DD was not design certified until 2023. We have been working on the renewal of the crediting period ever since, but this take time, and have still not been completed for either of the above-mentioned projects.

3. Request for being allowed a late validation of renewal of crediting period for a VPA.

VPA GS11717 is registered with a end of crediting period under Gold Standard at 02/08/2021. This is long before the PoA was design certified under Gold Standard. Even if the Crediting period under Gold Standard is extended to 02/08/2023, it would have been impossible to validate the renewal of the crediting period by this date. We hence request that Gold Standard accept that the Validation Report for the renewal of this project might be submitted by end of 2024, without any interruption in the Crediting periods under Gold Standard.

Approval for the request will have no negative impact but will have a positive impact on

- Environmental Integrity of the projects.
- Contribution to the Sustainable Development Goals.
- Safeguard principles.
- Compliance with host country regulations.

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.*

Not Applicable.

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):

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The deviation will not have any negative impact on the accuracy, completeness or the conservativeness of the projects or the program. There is no requested change in how the Emission Reduction is monitored or calculated.

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.*

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Not Applicable.

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):

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The deviation request will make it possible to renew the crediting periods before the previous crediting period expires. This will enable us to continue to earn carbon credits and thereby finance further support and expansion of our projects.

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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Not Applicable.

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