



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

14/08/2024

1.2 | Decision

The Deviation Request is approved.

The Project Developer request to support the validation for renewal of crediting period , as per the para 2.1.2 of the Annex B of Principles and Requirements version 1, in view of the conflict zone is approved. The PD shall ensure that the Objective Observer (OO) has been selected for the on-site audit as required by para 2.1.2 of the Annex B of Principles and Requirements version 1.2 and have conducted the audit under the guidance of a GS approved VVB.

The VVB shall provide a checklist to the selected Objective Observer before the site visit to assist the Objective Observer in assessing the relevant aspects related to the Project's Validation. The checklist must be limited to issues that the VVB thinks would

be necessary to check on-site to form the Validation opinion. The Project Developer will be responsible for contracting with and covering the costs of the Objective Observer(s). The relationship between and among the Project Developer and the Objective Observer and Gold Standard shall be established in a Memorandum of Understanding that must be signed by all parties.

The validating VVB shall ensure the following:

1. The Objective observer (OO) is selected to conduct the assessment as per the checklist provided.
2. The site visit conducted by the OO during the validation shall capture the information regarding the project impacts on the social, environmental and economic elements of the local community and during the verification shall confirm the status of the project operation and the mitigation plan in place to tackle the negative impacts of the project.
3. Assess and demonstrate how the selected OO has prior experience working in conflict zones/areas that pose a high risk to life and/or health. The VVB shall also demonstrate OO's involvement in other activities within the project's geographical area.

The VVB shall report the above mentioned information in the verification report.

The PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

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

SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

Note – The Project Developer shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the developer. The project developer shall comply with all other applicable standard requirements unless specifically mentioned in the deviation decision.

1.3 | Is this decision applicable to other project activities under similar circumstances?

Yes

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_777 | |
| Date of decision | 14/08/2024 | |
| Precedent (YES/NO) | Yes | |
| Precedent details | DEV 645, DEV 651 and DEV 528 | |
| Date of submission | 29/07/2024 | |
| Project/PoA/VPA | Project | ID – GSXXXX |
| | <input type="checkbox"/> PoA | ID – GSXXXX |
| | <input checked="" type="checkbox"/> VPA | ID – GS10790 |
| Project/PoA/VPA title | GS10789 VPA1: Efficient and Clean Cooking for households in Somalia | |
| Date of listing | GS10790: 05/10/2020 | |
| GS Standard version applicable | - | |
| 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) | - | |
| Location of project/PoA/VPA | Host country(ies): The Federal Republic of Somalia | |
| 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 | GS 10790: https://registry.goldstandard.org/projects/details/2747 | |
| Status of the project/PoA/VPA | <input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project | |
| Title/subject of deviation | GS4GG Principles and Requirements, ANNEX B – CONFLICT AND EMERGENCY ZONES paragraph 2.1.1 regarding deviation on case-to-case basis for on-site visit in conflict and emergency zones | |

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| <p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p> | <p>GS4GG Principles and Requirement Annex B, paragraph 2.1.1: Gold Standard will assess applications on a case-by-case basis. To be eligible for the rule deviation described herein, there must be evidence that demonstrates that VVBs are not willing to go on-site. Furthermore, the applicant must demonstrate prior experience working in conflict zones/areas that pose a high risk to life and/or health. And show involvement in other activities within the considered area, apart from implementing the project under review. Alternatively, the establishment of a formal collaboration with partners who have such experience and involvement in the considered area may qualify under these rules as long as the collaboration is sustained over the entire certification period of the Project.</p> |
| <p>Specify the monitoring period for which the request is valid (if applicable)</p> | <p>GS10790: validation for Renewal of crediting period</p> |
| <p>Submitted by</p> | <p>Contact person name: PETER SCOTT Email ID: peter.scott@burnmfg.com Organisation: BURN Manufacturing Co. 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 type="checkbox"/> No <input checked="" type="checkbox"/> If yes; VVB name: VVB Staff name(s):</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> |

3 | Deviation detail

3.1 | Description of the deviation:

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3.1.1 | Deviation detail (to be completed by Project developer):

Paragraph 2.1.1 of ANNEX B of the Gold Standard Principles and Requirements, version 1.2, provides specific guidance for deviations for the verification of projects located in conflict zones or areas that pose high risk to life. The guidance provided dictates that the *“Gold Standard will assess applications on a case-by-case basis. To be eligible for the rule deviation described therein, there must be evidence that demonstrates that VVBs are not willing to go on-site. Furthermore, the applicant must demonstrate prior experience working in conflict zones/areas that pose a high risk to life and/or health. And show involvement in other activities within the considered area, apart from implementing the project under review. Alternatively, the establishment of a formal collaboration with partners who have such experience and involvement in the considered area may qualify under these rules if the collaboration is sustained over the entire certification period of the Project.”*

BURN Manufacturing Co. (“BURN”) would like to request for this deviation for VPA GS10790. This project continues to help thousands of people in SOMALIA to access and use energy efficient biomass cookstoves which collectively abate GHG emissions and provide numerous, SDG-defined co-benefits.

BURN is now requesting this deviation with respect to the planned validation for Renewal of crediting period for the VPA, which is situated in a Conflict Zone. As the project developer, BURN has continued to monitor the security situation in Somalia. Numerous regions in the Country have witnessed and continue to suffer the adverse effects of an on-going security crisis; with frequent terrorist attacks preventing major transport infrastructure points (highways, airports etc.) across the country. A situation which renders the ability of VVB’s who are not native to the Country both perilous and unpredictable.

2 VVBs have confirmed that they are not willing to visit Somalia due to its insecurity, and the evidence for this has been provided as supporting documentation to this deviation request. At this moment, it is impossible to predict when the security situation will stabilize, and BURN is at risk of the project’s timelines getting delayed and the issuance timelines for the VPA being delayed inordinately. With respect to this position, BURN would like to request that objective observer be allowed for the on-site audit as required by para 2.1.2 of Annex B of Principles and Requirements version 1.2.

In applying this deviation, BURN has adhered to the following core GS principles:

- **Environmental integrity:** This deviation doesn’t result in any over-estimation of GS VERs.
- **Contribution to Sustainable Development Goals (SDGs):** The SDG contribution achieved are in line with GS4GG requirement and are not compromised.
- **Safeguarding principles and Requirements:** Safeguarding Principles Assessment carried out for the VPA is in line with GS4GG requirements.
- **Compliance with host country regulations:** The scope of this deviation work does not conflict 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.*

The VVB has assessed the current situation in Somalia through the latest news report and from other local sources and concludes that performing an on-site audit in the upcoming month is found to be difficult as it poses risk to life for the VVB. Extending the validation does not also prove to be a viable alternative considering the delay that will be caused for issuance.

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 proposed deviation does not compromise or have any negative influence on the accuracy, completeness or any other requirement of Gold Standard for Global Goals. This deviation is being requested considering project area falls under conflict zone which makes on-site verification visits difficult.

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.*

The VVB has developed risk assessment based on non-conduction of on-site visit and possible mitigation to avoid risk associated with remote assessment as given in the section 3.3. Moreover, VVB agrees to GS decision of contracting an objective observer to carry out the on-site visit selected by GS.

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 impact on the project design, safeguarding principles, SDG assessment, data quality, potential risk or any other aspects of the project due to this deviation. The VPA will abide by all Gold Standard requirements.

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

| Sl. 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, VPA DD) | The on-site assessment will be conducted by the experienced objective observer, he will conduct the interviews as directed by the lead auditor, capture the real time photograph as evidence and the implemented project technology can be checked by him. Cross checking the same through other relevant documents such as project database, monitoring survey records. Checklist provided to the objective observed will contain relevant data to make sure that the project | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

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| | | implementation is as per the registered PDD. | |
| 2 | Risk associated to verify implemented monitoring plan with the registered/included documents (PDD/PoA-DD, VPA-DD) and applied baseline and monitoring methodology | This risk can be mitigated by conducting the interview with end users by objective observer on site to cross check the Monitoring parameters described in certified versions of POA-DD / VPA-DD vis-à-vis their monitoring equipment/procedures and also to check records like project database, monitoring survey sheets and other relevant documents. | <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 interview video call/video recording/a real time photo of the monitoring equipment through the help of objective observer. Interview with the project implementation representatives, enumerators will be carried out. A checklist will be provided to the objective observer to make sure that actual monitoring systems and procedures comply with the procedures described in monitoring plan. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4 | Risk associated to evaluate the GHG emission reduction | The identified risk can be mitigated by managing | <input checked="" type="checkbox"/> Yes |

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| | data and express a conclusion with a reasonable level of assurance on whether the reported GHG emission reduction data is free from material misstatement | access to the records during audio/video calls. It can be verified whether project has adequate controls related to data changes/updates, version tracking, traceability, security and whether data is reproduceable from the sample sheets. Furthermore, data quality control personnel can also be interviewed to establish the level of assurance. | <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 complete set of data for the monitoring period and Information provided in the monitoring report can be cross-checked with other sources such as Survey sheet/household interviews. To check whether, calculations of baseline emissions and emission reduction has been carried out in accordance with the formulae and methods described in the monitoring plan and the applied methodology. A checklist will be provided to the objective observer to check all the project specific GHG emission data. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 6 | Any outstanding | The identified risk is | <input checked="" type="checkbox"/> Yes |

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| | FAR(s)/pending issue(s) since the previous physical site visit. | mitigated by reviewing the previous Verification report and found that no FAR is raised during last Monitoring Period. | <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. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 8 | Any design change(s)/temporary deviation(s) since the previous physical site visit. | The identified risk will be mitigated by reviewing the previous monitoring/verification report and any design change proposed/approved will be assessed complying to the GS principles and requirement. Checklist will be provided to the objective observed considering the available design change/deviation | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

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 |

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| | | - 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 |