



Gold Standard[®]
for the Global Goals

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

07/09/2024

1.2 | Decision

The Deviation Request is Conditionally Approved.

Exemption shall be given for GS10884 & GS10885 until 31/03/2025 for completion of renewal submission, due to the ongoing situation in Kenya. Any further delay would incur loss of credits in line with p.5.1.46 of GS4GG P&R. The decision shall not be taken as precedent for other project activities.

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 until unless specifically mentioned in the deviation decision.

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_790	
Date of decision	07/09/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	16/08/2024	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS10884
	<input checked="" type="checkbox"/> VPA	ID – GS10885
Project/PoA/VPA title	PoA title: KOKO KENYA - ETHANOL COOKSTOVES PROGRAM (GS10884) VPA title: GS10884 - KOKO KENYA - ETHANOL COOKSTOVES PROGRAM - CPA-0001 (GS10885)	
Date of listing	-	
GS Standard version applicable	GS4GG Principles and Requirement, Version 1.2, dated 24th October 2019	
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	Kenya	
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	PoA GS10884: https://registry.goldstandard.org/projects/details/2841 VPA GS10885: https://registry.goldstandard.org/projects/details/2842	
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	Deviation from GS4GG requirement related to delay in the renewal of crediting period.	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Deviation from Para 5.1.46 GS4GG principles and requirement Version 1.2. Para 8.9.1 and 8.9.5 of Gold Standard Programme of Activity Requirements And Procedures V-2.1 dated 05.10.2023
Specify the monitoring period for which the request is valid (if applicable)	Start date - NA End date - NA
Submitted by	Contact person name: Greg Murray
	Email ID: g.murray@kokonetworks.com
	Organisation: KOKO Networks 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 checked="" type="checkbox"/> No <input type="checkbox"/>

3 | Deviation detail

3.1 | Description of the deviation:

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

Executive Summary

The current crediting period (CP) for the projects GS10884 & GS10885 is concluding on 22nd October 2024. The project Developer initiated the process of renewal (GS RCP) since March 2024 with the view of completing it within 6 months (by end of September 2024). However, due to multiple emergency conditions affecting the baseline data collection activities in Kenya, project developer anticipates significant delay in completion of the project renewal process for both the projects. Hence, the CME would like to submit the deviation request for extension of deadline till 30th June 2025 for submission of CP renewal request for the projects.

Relevant GS Rules & Guidelines

PP is requesting deviation from the following GS rules and requirements related to renewal of crediting period.

Paragraph 5.1.45 & Paragraph 5.1.46 of Gold Standard, GS4GG principles and requirement, version 1.2, dated 24th October 2019

5.1.45 | To maintain Gold Standard Certified Project status beyond five years, a Project must undergo Design Certification Renewal. This process shall begin (defined by the submission of a Renewal opinion by a VVB for Design Review to Gold Standard) no later than the last date of current certification cycle. Note that review of the Design Certification Renewal may complete after the last date of current crediting period. In this case, the renewal date shall be the first day after the end date of the current certification cycle.

5.1.46 | Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay).

Paragraph 8.9.1 and 8.9.5 of Gold Standard Programme of Activity Requirements And Procedures V-2.1 dated 05.10.2023

8.9.1 | To maintain Gold Standard Certified status beyond five years, a PoA and its VPAs shall undergo Design Certification Renewal. This renewal process shall begin (defined by the submission of a validation report by a VVB for renewal of crediting period of PoA and its VPAs to Gold Standard) no later than the last date of current crediting period.

8.9.5 | Delay in the submission of validation report by a VVB for renewal of crediting period beyond the last date of current crediting period will result:

- a. For PoA - no new real case/regular VPAs can be included during the delay period;
- b. Real case and regular VPAs - Certified Products and/or Impact Statements cannot be issued for period of delay. In such cases period of delay will be the period between end date of current crediting period and the submission of validation report by a VVB for renewal of crediting period. For example, a delay of 1 year beyond end date of the first crediting period shall mean that no issuance can be requested for period of delay of 1 year. However, the crediting period start and end date will be unchanged and will be determined as per para 8.9.2, above.

This deviation request submission is based on precedence set from the Gold Standard Deviation number- DEV_158¹ which states:

The project is allowed to claim a part of their gap period following a delay in submitting request for renewal of its crediting period, if it can demonstrate that –

a) The delay in applying for CP renewal was due to exceptional circumstances, for example the project’s presence in a refugee zone/conflict area.

b) The project has all the monitoring data available in compliance with the methodology version applicable at time of renewal of crediting period. The maximum allowable gap in such cases is

a) 1 year for non-LDC/LLDC/SIDS

b) 2 years for LDC/LLDC/SIDS

Context of the Deviation

KOKO Networks (CME) has implemented and managed the operations of “KOKO Kenya-Ethanol cookstove programme” ([GS10884](#)) and “GS10884 - KOKO Kenya - Ethanol Cookstoves Program - CPA-0001” ([GS10885](#)) in Kenya. The project has so far been able to reach more than 1.3 million households and provides them with clean and efficient cooking technology. Among carbon projects, the ethanol-based cooking in Kenya is one of its kind which have complete ICT based setup from stove distribution to fuel dispensing.

The current crediting period for both the projects is set to conclude on 22nd October 2024 (CP1: 23rd October 2019 – 22nd October 2024). We had initiated the activities for renewal of crediting period in March 2024 with a timeline to complete the process by end of September 2024. However, we have been facing significant barriers in conducting the field studies required for baseline data collection. This has resulted in implementation delays of key process-chains due to health and safety concern of the implementation team in Kenya. The key factors driving the health and safety concerns are described below:

¹ https://globalgoals.goldstandard.org/standards/DEV_158_Deviation-Request-Solar-cooking-in-Chad.pdf

1. There are series of nation-wide protests ongoing in Kenya since June 2024 against the latest Finance Bill 2024. Although started as peaceful demonstrations, these protests have rapidly snowballed into violent clashes between the police and the youth of Kenya leading to many casualties. Though the Finance Bill is withdrawn by the Government due to the protests, the situation in the country hasn't returned to normalcy yet due to various factors like deployment of defence forces, decentralized protests from youth against the unresolved issues, etc. This has resulted in a state of panic across the country and the households are not willing to participate in any kind of field studies. Additionally, CME is cautious in moving ahead with the field surveys due to safety concerns of the KOKO employees/contracted staff.

Below are some of the publicly available news/information regarding the protests:

Kenya's President Seeks to Quell Protests After 2 Killed, 200 Injured in Police Response dated 24/06/2024

https://www.democracynow.org/2024/6/24/headlines/kenyas_president_seeks_to_quell_protests_after_2_killed_200_injured_in_police_response

Kenya: Security services must respect fundamental rights during nationwide protests dated 02/07/2024

<https://www.amnesty.org/en/latest/news/2024/07/kenya-security-services-must-respect-fundamental-rights-during-nationwide-protests/>

Kenyans vow to 'take back' their country on August 8 dated 07/08/2024

<https://www.dw.com/en/kenyans-vow-to-take-back-their-country-on-august-8/a-69875853>

Kenya erupts in new wave of protests dated 09/08/2024

<https://english.news.cn/20240809/3a43cb217ece47f7bcfd7dd832767ec0/c.html>

2. DRC and neighbouring countries of Africa including Kenya have witnessed Monkeypox (mpox) outbreak, which will further affect our timelines related to baseline surveys. The same has been recognised by WHO and declared public health emergency of international concern (PHEIC) under the International Health Regulations (2005) (IHR). It has been spreading rapidly to other Continents creating a global concern of another pandemic affecting the whole world.

<https://www.who.int/news/item/14-08-2024-who-director-general-declares-mpox-outbreak-a-public-health-emergency-of-international-concern>

Description of the Deviation Request

Due to the above emergency conditions affecting the essential activities for baseline data collection, CME foresee inability to complete the validation of the RCP request by the stipulated deadline (22nd October 2024). CME anticipates that these volatile situations may extend upto the end of the year 2024 which would interrupt the completion of all stages of the baseline re-assessment for the project. Hence, CME requests a deviation from the above mentioned guidelines to allow extension of the submission deadline for the Renewal of Crediting Period Request for the projects, GS 10884 and GS 10885, specifically:

1. Exemption from the requirement (of RCP submission deadline) as defined in Paragraph 5.1.45 of Principle & Requirements and Paragraph 8.9.1 of PoA Requirements, thereby granting extension of submission deadline for Renewal of Crediting Period (RCP) Request till 30th June 2025.
2. Exemption from the requirement (of curtailment of issuance cycle during the delay period) as defined in Paragraph 5.1.46 of Principle & Requirements and Paragraph 8.9.1 of PoA Requirements, thereby granting permission to allow continuation of the issuance cycle under Crediting Period 2 from the next day of the current crediting period i.e. 23rd October 2024 to 22nd October 2029.

Given the unforeseen challenges we have encountered, we respectfully request a postponement of the submission deadline to June 30, 2025. This extension will allow us the necessary time to diligently compile and finalize all requisite information, thereby ensuring a comprehensive and accurate submission.

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.*

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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):

As stated above, the present request is to deviate from para 5.1.46 GS4GG principles and requirement Version 1.2. and para 8.9.1 and 8.9.5 of Gold Standard Programme of Activity Requirements and Procedures V-2.1. Apart from this rule, the project complies with all other requirements.

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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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 are no negative impacts envisaged from this deviation request as it does not hamper with any of the compliances with regards of the methodology requirements.

Other parameters can be considered as follow: -

Emissions reductions: the requested deviation will have no impact on these.

Emissions reductions would be calculated and accounted in line with provisions of registered monitoring plan and methodology.

SDG impacts: the requested deviation is related to the management of the project only. As such, it will have no impacts on the project SDGs. In fact allowing the deviation would help the project participant to service the user base more efficiently and with better financial resources, PP can continue with its services and reach many more users and thus advance SDG impacts.

Potential risk: there is no risk that is perceived in this request.

Furthermore, this deviation does not impact project design, monitoring frequency, data quality and safeguarding principles assessment.

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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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