



# 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 – dd/mm/yyyy

10/10/2024

#### 1.2 | Decision

The Deviation Request is Approved.

Due to the current humanitarian crisis situation in Haiti, exemption has been granted to conduct the remote site visit due to emergency and force majeure situations in line with p2.1 of RULE UPDATE-Applicability of minimum site visit requirements by VVB. However, this exemption is granted for the current monitoring period only and shall not be taken as a precedent for further monitoring periods.

VVB shall carry out a risk assessment for conducting the remote verification in line with Annex-1: Risk assessment guidelines as per Site Visit and Remote Audit Requirements and Procedures – V2.0. Such assessment shall be part of the Verification report.

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_804	
Date of decision	10/10/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	September 18, 2024	
Project/PoA/VPA	<input type="checkbox"/> Project	GS12910
	<input type="checkbox"/> PoA	ID -
	<input checked="" type="checkbox"/> VPA	ID - GS12856
Project/PoA/VPA title	Unlocking Communities High Efficiency Charcoal Cookstoves and Water Filters	
Date of listing	August 30, 2024	
GS Standard version applicable	Gold Standard for the Global Goals	
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	Haiti	
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://platform.sustain-cert.com/public-project/4103">platform.sustain-cert.com/public-project/4103</a> <a href="https://platform.sustain-cert.com/public-project/4157">https://platform.sustain-cert.com/public-project/4157</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input checked="" type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Request to Conduct Remote Site Visit for the GS Project in Haiti	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	GS TPDDTEC V4.0: REDUCED EMISSIONS FROM COOKING AND HEATING - TECHNOLOGIES AND PRACTICES TO DISPLACE DECENTRALIZED THERMAL ENERGY CONSUMPTION	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/08/2023	End date 12/07/2024

Submitted by	Contact person name: Josh Goralski
	Email ID: josh@unlockingcommunities.org
	Organisation: Unlocking Communities
	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: Carbon Check (India) Private Limited  VVB Staff name(s): Hariprasath A L
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):

This deviation request seeks an exemption from the mandatory on-site visit requirement for the validation and first verification of the project titled “Unlocking Communities High Efficiency Charcoal Cookstoves and Water Filters” (GS12910). The project, which launched in October 2018, is currently undergoing a combined validation and first verification for the monitoring period of August 1, 2023, to July 12, 2024.

The request for deviation is based on the current unrest and security concerns in Haiti, the host country of the project. News reports from sources like [AP News](#), [UN Nations](#), and [UN News](#) have highlighted significant risks and challenges associated with on-site visits, making them potentially unsafe for all parties involved.

Applicable Rules/Requirements:

- Paragraph 3.1.1 of the Site Visit and Remote Audit Requirements, V2.0, mandates a physical site visit within two years of the project start date.
- Paragraph 3.2.2 of the same document makes a physical site visit by the Validation Verification Body (VVB) mandatory for the first verification of a project.

*Proposed Alternative:* To ensure safety and compliance with project requirements, a remote site visit is proposed as a safe and effective alternative to an on-site visit. This approach will allow for necessary assessments and evaluations while mitigating the risks posed by the current situation in Haiti. The project developers will provide all necessary documentation and evidence remotely to support the verification process.

Alignment with Deviation Principles:

- **Environmental Integrity:** A remote site visit will not compromise the environmental integrity of the project or lead to an overestimation of emission reductions.
- **Contribution to Sustainable Development Goals (SDGs):** The deviation will not negatively impact the project's contribution to the SDGs. The project aims to improve access to clean cooking and safe drinking water, and these objectives remain unchanged despite the proposed remote verification approach.
- **Safeguarding Principles and Requirements:** The safety and well-being of all stakeholders, including the VVB team, are paramount. The proposed deviation prioritizes safety by avoiding travel of international persons to a high risk country.

**Compliance with Host Country Regulations:** The project will continue to comply with all relevant regulations in Haiti. The deviation solely pertains to the method of conducting the site visit and does not alter any project activities.

By granting this deviation, Gold Standard/SustainCERT would enable the project to proceed with its first verification process safely and efficiently while upholding the principles of the Gold Standard for the Global Goals.

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 Haiti through the latest news report and from other local sources and concludes that performing an onsite verification in the upcoming month is found to be difficult as it poses security and safety risk to life. Extending the verification does not also prove to be 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):

This deviation request seeks an exemption from the mandatory physical site visit requirement stipulated in Paragraph 3.2.2 of the Gold Standard for the Global Goals (GS4GG) site visit and remote audit requirements and procedures, V2.0. The request is based on the current unrest and security concerns in Haiti, which pose significant safety risks to the Validation Verification Body (VVB) team. This deviation aligns with Gold Standard requirements by ensuring a conservative approach is maintained, prioritizing the safety and well-being of all stakeholders, and preserving the integrity of the verification process through a robust remote verification methodology.

To ensure the accuracy, completeness, and conservativeness of the verification process despite the deviation from a physical site visit, the following measures will be implemented:

- The project developers will provide all necessary documentation electronically to the VVB team for remote review.
- Robust Remote Verification Methodology: The VVB team will employ a robust remote verification methodology, including:
  - Thorough review of all project documentation, data records, and supporting materials to assess compliance with GS4GG requirements.
  - In-depth analysis of project data, including emission reductions, SDG impact data, and other relevant metrics, to verify accuracy and completeness.
  - Virtual interviews will be conducted with the project developers and other stakeholders using video conferencing tools to gather firsthand



information and clarify any uncertainties. Internet access will be provided to stakeholders, as needed, via hotspots or internet cafes to facilitate these interviews.

- **Third-Party Verification of Physical Operations:** Recognizing the limitations of remote assessments for certain physical aspects, the VVB will engage third-party entities or individuals in Haiti to perform specific physical operations and measurements as needed. This will ensure the accuracy and reliability of data related to physical installations or parameters that require on-site observation.
- **Remote Data Collection and Communication:** The VVB team will leverage various communication and data collection methods, including video conferencing, messaging applications like WhatsApp, email, and remote data collection platforms that can operate offline and synchronize data to the cloud when internet access is available. This multi-faceted approach will ensure data integrity and facilitate a comprehensive review of project data, even with potential internet connectivity limitations in Haiti.
- **Interpreters:** To overcome potential language barriers during virtual meetings and interactions with local stakeholders, interpreters will be available.
- **Selection of Objective Observer:** In alignment with Gold Standard Principles and Requirements, an objective observer will be used to ensure project integrity. The objective observer will be selected by Gold Standard as required in the Principals and Requirements.

#### Additional Information:

- **Safety and Well-being:** The proposed deviation prioritizes the safety and well-being of the VVB team and other out-of-country stakeholders by avoiding travel to Haiti, which is currently experiencing unrest and security concerns.
- **Project History and Operational Status:** The project has been operational since October 2018, demonstrating its long-standing commitment to delivering sustainable development benefits as well as experiencing working in conflict zones
- **Alignment with Gold Standard Principles:** The requested deviation aligns with the Gold Standard's principles of environmental integrity, contribution to the SDGs, safeguarding principles and requirements, and compliance with host country regulations.
- **Precedence for Remote Verifications:** Gold Standard has historically approved deviations from on-site visit requirements due to security concerns or

exceptional circumstances, such as the COVID-19 pandemic. This precedent demonstrates Gold Standard's understanding of the need for flexibility while upholding the rigor of the verification process.

### 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. Further, as per the requirement mentioned in the GS4GG Principles & Requirements, ANNEX B – CONFLICT AND EMERGENCY ZONES, VVB agrees to GS decision of contracting an objective observer to carry out the onsite visited 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):

The deviation from a physical site visit to a remote verification approach is not anticipated to have any direct impacts on the project design, safeguarding principles assessment, SDG assessment, emissions reductions, or monitoring frequency. The core components of the project, its implementation strategy, and the methodologies used to assess its impacts remain unchanged. The primary impact of this deviation relates to the process and logistics of data collection and verification.

#### Impact on Data Quality and Potential Risks:

- **Data Quality:** The sources and our conversation history highlight the importance of robust remote verification methodologies to maintain data quality. Implementing a multi-faceted approach to data collection, including document reviews, virtual interviews, and third-party verification of physical aspects, can effectively mitigate potential risks to data accuracy and reliability.

- Potential Risks:
  - Verification Challenges: Remote assessments may pose challenges in verifying physical installations or observing community interactions firsthand. Engaging third-party entities in Haiti for specific on-site observations can help address this limitation.
  - Internet Connectivity: Reliable internet access in Haiti is crucial for the success of the remote verification process. Leveraging a combination of online and offline data collection tools can minimize disruptions caused by potential internet connectivity issues. Providing internet access to stakeholders, where necessary, through strategies like using hotspots or internet cafes, is crucial to ensure equitable participation in virtual interviews.

Justification for Minimal Impact on Other Project Aspects:

- Project Design and SDG Assessment: The project's design, SDG targets, indicators, and data collection methods are determined *a priori* and documented in the Project Design Document (PDD). The deviation does not alter these predefined elements, hence having minimal impact on these aspects.
- Safeguarding Principles: The project's commitment to upholding safeguarding principles is evident in the comprehensive Safeguarding Principles Assessment outlined in the PDD. The remote verification process will still include a thorough review of documentation and evidence related to safeguarding measures, ensuring continued compliance.
- Emissions Reductions: The calculation of emissions reductions relies on pre-established methodologies and data collection procedures defined in the PDD. As the deviation does not affect the actual implementation or data sources used for these calculations, it is expected to have a negligible impact on emissions reductions estimates.
- Monitoring Frequency: The project's monitoring plan, including data collection frequency, remains unchanged, as detailed in the PDD. The remote verification process will adapt to this established monitoring plan, ensuring no changes in data collection frequency.

While the shift to a remote verification approach necessitates careful planning and adaptation, the overall impact on the project is anticipated to be minimal, provided

the mitigation measures outlined in the deviation request and this impact assessment are effectively implemented. The priority is to maintain the integrity of the verification process while ensuring the safety and well-being of all stakeholders involved.

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)	During remote interviews by means of using audio/video call (as feasible) and real time photographs at the time of remote inspection and on-site assessment by the objective approver, the implemented project technology can be checked. 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 implementation is as per the PDD.	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
2	Risk associated to verify implemented monitoring plan with the	This risk can be mitigated by conducting remote interview via audio/video	<input checked="" type="checkbox"/> <b>Yes</b>

	registered/included documents (PDD/PoA-DD, VPA-DD) and applied baseline and monitoring methodology	call with end users and assessment by objective observed 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 type="checkbox"/> <b>No</b>
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 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 observed to make sure that actual monitoring systems and procedures comply with the procedures described in monitoring plan.	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
4	Risk associated to evaluate the GHG emission reduction data and express a conclusion with a reasonable level of assurance on whether the	The identified risk can be mitigated by managing access to the records during audio/video calls. It can be verified whether project has adequate	<input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>

	reported GHG emission reduction data is free from material misstatement	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.	
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 PDD and MR 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"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
6	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"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>

### 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