TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 17/01/2023

1.2 | Decision

The deviation request is APPROVED for the monitoring period 01/01/2021 to 31/12/2021. The VVB shall however:

- Apply the GS4GG Remote Audit and Site Visit Requirements to carry out the remote audit.
- Submit the Audit Techniques Checklist (Annex 3 of GS4GG Remote Audit and Site Visit Requirements) along with the verification report.

The PD shall note that an on-site visit shall be carried out as part of the next periodic verification. The same shall be raised as a Forward Action Request by the VVB.

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	COVID_DEV 352	
Date of decision	17/01/2023	
Precedent (YES/NO)	NO	
Precedent details	N/A	
Date of submission	09/01/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	☐ PoA	ID – GS1340
	☒ VPA	GS2456 GS3516 GS3517 GS3518 GS3519 GS3520 GS3521 GS3522 GS3523 GS3524 GS6152 GS6419 GS6420 GS10778 GS10779 GS10780 GS10781 GS11074 GS10922 GS10923 GS10924 GS11070 GS11071
Project/PoA/VPA title	- GS1340 Efficient cookstoves in Burkina Faso – VPA-01 - tiipaalga F3PA cookstoves in Bam and Loroum (GS2456) - GS1340 Efficient cookstoves in Burkina Faso – VPA-02 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3516) - GS1340 Efficient cookstoves in Burkina Faso – VPA-03 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3517)	

	- GS1340 Efficient cookstoves in Burkina Faso – VPA-04 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3518) - GS1340 Efficient cookstoves in Burkina Faso – VPA-05 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3519) - GS1340 Efficient cookstoves in Burkina Faso – VPA-06 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3520) - GS1340 Efficient cookstoves in Burkina Faso – VPA-07 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3521) - GS1340 Efficient cookstoves in Burkina Faso – VPA-08 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3522) - GS1340 Efficient cookstoves in Burkina Faso – VPA-09 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3523) - GS1340 Efficient cookstoves in Burkina Faso – VPA-10 - tiipaalga F3PA cookstoves in Bam and Loroum (GS3524) - GS1340 Efficient cookstoves in Burkina Faso – VPA-11– Tiipaalga – F3PA cookstoves in Kourwéogo (GS6152) - GS1340 Efficient cookstoves in Burkina Faso – VPA-12– Tiipaalga – F3PA cookstoves in Kourwéogo (GS6419) - GS1340 Efficient cookstoves in Burkina Faso – VPA-13– Tiipaalga – F3PA cookstoves in Kourwéogo (GS6420) - GS1340 Efficient cookstoves in Burkina Faso - VPA-14 – Improved cookstove F3PA project in Nahouri (GS10778) - GS1340 Efficient cookstoves in Burkina Faso - VPA-15 – Improved cookstove F3PA project in Nahouri (GS10779) - GS1340 Efficient cookstoves in Burkina Faso - VPA-16 – Improved cookstove F3PA project in Nahouri (GS10780) - GS1340 Efficient cookstoves in Burkina Faso - VPA-17 – Improved cookstove F3PA project in Nahouri (GS10781) - GS1340 - Efficient cookstoves in Burkina Faso – tiipaalga F3PA cookstoves in Center-South Protected Areas - VPA-18 (GS10922)

	- GS1340 - Efficient cookstoves in Burkina Faso – tiipaalga F3PA cookstoves in Center-South Protected Areas - VPA-19 (GS10923) - GS1340 - Efficient cookstoves in Burkina Faso – tiipaalga F3PA cookstoves in Center-South Protected Areas - VPA-20 (GS10924) - GS1340 Efficient cookstoves in Burkina Faso – VPA-25 – Solidagro F3PA cookstoves in Passoré (GS11070) - GS1340 Efficient cookstoves in Burkina Faso – VPA-26 – Solidagro F3PA cookstoves in Passoré (GS11071) - GS1340 Efficient cookstoves in Burkina Faso - VPA-29 - Improved Cookstove F3PA project in Nahouri (GS11074)
Date of listing	GS2456_GS3516-24: 21/10/2015 GS6152_GS6419-6420: 01/01/2018 GS10778-10781_11074: 18/05/2020 GS10922-10924: 19/12/2020 GS11070-11071: 26/02/2021
GS Standard version applicable	GS4GG
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)	GS2456_GS3516-24: 21/10/2015 GS6152_GS6419-6420: 27/09/2019 GS10778-10781_11074: 12/03/2021 GS10922-10924: 12/07/2022 GS11070-11071: 14/07/2022
Location of project/PoA/VPA	Burkina Faso
Scale of the project/PoA/VPA	☒ Microscale ☐ Small scale ☐ Large scale
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects?q=1340&page=1
Status of the project/PoA/VPA	☐ New ☐ Listed ☐ Certified design ☒ Certified project

Title/subject of deviation	PoA GS1340- Verifications vintage 2021: audit procedures
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Microscale project requirements v1.2 para. 11.1.10 Site-Visit-and-Remote-Audit-Requirements v1.0
Specify the monitoring period for which the request is valid (if applicable)	Start date: 01/01/2021 End date: 31/12/2021
Submitted by	Contact person name: Victor Costenoble Email ID: v.costenoble@southpole.com
	Organisation: CO2logic, part of South Pole
	Project participant: Yes ☒ No ☐
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes ☒ No ☐ If yes; VVB name: Carbon check India Private Limited, Noida VVB Staff name(s): Team leader- Harish Sharma Trainee Assessor - Siddhant Bankar, Technical Reviewer – Shivaji Chakraborty
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☐ No ☒

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):

Context:

The proposed deviation concerns the verification of the vintage 2021 of 5 grouped micro-scale projects (23 micro-scale projects in total) listed under the PoA GS1340 Efficient cookstoves in Burkina Faso:

- VPAs 1 to 10: tiipaalga F3PA cookstoves in Bam and Loroum (MP7).
- VPAs 11 to 13: Tiipaalga – F3PA cookstoves in Kourwéogo (MP2-3-4);
- VPAs 14-17 & 29: Improved cookstove F3PA project in Nahouri (MP1-2);
- VPAs 18-20: tiipaalga F3PA cookstoves in Center-South Protected Areas (MP1);
- VPAs 25-26: Solidagro F3PA cookstoves in Passoré (MP1).

The verification documents for all the internal verifications were shared by Project participants between August and October 2022 on SC platform. On the 10/11/2022[1], SustainCERT suggested an alternative solution to immediately commence the internal verification process. Upon acceptance of the project participants (signature of consent form on the 23/11/2022), an external VVB (Carbon Check india private limited) was appointed by SustainCERT to proceed with the verification procedure. In preparation of the audit, the VVB Carbon Check asked project participants to seek for a deviation from a physical site visit to a remote audit.

Situation:

As per the present deviation request form, project participants are asking the certification standard to accept the proposition (doing a remote audit instead of a physical site visit).

In the past for those projects under the PoA GS1340, 10 internal verifications have already been conducted remotely based on desk reviews performed by SustainCERT. Those verifications all lead to positive outcomes (i.e. issuances of the associated carbon credits) and no major findings were raised by the Standard. Moreover, the security situation in Burkina Faso[2] prevents from conducting a physical site visit in the country. According to the UK[3] & French[4] governments, the whole country is advised against all travels except for the capital Ouagadougou (essential travels only). As the projects

[1] See email exchange : '20221110- Interim solution for Internal Verification'
[2] See also : https://issat.dcaf.ch/Learn/Resource-Library/Case-Studies/Burkina-Faso-Current-Critical-Security-Issues
[3] Map from : https://www.gov.uk/foreign-travel-advice/burkina-faso#:~:text=The%20political%20situation%20in%20Burkina,vigilant%20and%20monitor%20local%20media.
[4] Map from : https://www.diplomatie.gouv.fr/fr/conseils-aux-voyageurs/conseils-par-pays-destination/burkina-faso/#entree

intervention areas are located in the provinces outside the capital, conducting a site visit would constitute a high risk for the security of the participants. In addition, it is deemed unjustified as it would lead to additional unexpected costs and delays in the verification process. Hence, Project Developers are seeking a deviation in order to conduct a remote assessment in the most simple but compliant manner, limiting the security risks for any of the involved entities (project participants, VVB, beneficiaries,…).

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

From above Description of deviation, it is observed that due to security reasons travelling to Burkina Faso is not advised. Furthermore, various international bodies including UK, Canada and New Zealand Govt. also issued not to visit advisory for Burkina Faso due to unrest and security reasons. Considering above steps for the remote site visit VVB has developed risk assessment based on the non-conduction of the on-site visit and possible mitigations to avoid the risk associated with the remote site assessment given in section 3.3. Furthermore, the VVB opinion on the assessment of deviation is provided in section 3.2.2

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):

For the projects submitted for internal verification, the monitoring report along with supporting evidence and documents were shared with SustainCERT to initiate the Internal verification as per the Micro-scale project requirements. The GS Site visit and remote audit requirements and procedures, including the mandatory field visit every 3 years, do not apply in this case because of the scale of the projects (see paragraph 1.2.2. of the document). As per the Microscale project requirements para. 10.1.2.e., the VPAs may be selected by the VVB (initially SustainCERT) for a verification appraisal by an Objective Observer. In this case, the costs would be covered by the Verification Fund.

As per para. 11.1.10 of the same document: For projects not selected for an appraisal by an Objective Observer at verification stage and in view of any request for issuance, Project Developers shall provide relevant information in the monitoring report

including, the status of the project operation, mitigation plans to address negative impacts and the identification of any risks, and an assessment of any new negative impacts that have occurred due to the implementation and operation of the project[5].

Considering the security situation in the country, this approach (i.e. desk review of the submitted documents) is the one suggested by the project developers.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

In line with 4.1.1 (b) of "Site visit and remote audit requirement and procedures", and in line with 2.2.3(i) of "Applicability of minimum site visit requirement by VVB" as informed by the Developer the site visit is not possible due to security conditions in Burkina Faso and the significant impact of delaying the site visit on project developer due to timeline/commitments. Hence, referring to section 4.1.1 (b), VVB proposes to replace the mandatory on-site visit with a remote audit. The impact assessment has been carried out to analyze the risk associated with the non-conduction of mandatory physical on-site inspection for verification which is in line with the Annex 1 Risk assessment guideline of "Site visit and remote audit requirement and procedures" and the same is provided in section 3.3.2.

3.3 | Impact of the deviation:

3.3.1 | Impact assessment (to be completed by Project developer):

This deviation will have no impact on the mentioned aspects of the project: project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, and potential risks,as all these aspects will covered by the VVB through remote audits based on the project documentation.

[5] Those information are already found in the monitoring reports submitted for revision.

Besides, the proposed approach (i.e. desk review) would limit any risk associated with physical site visit within the country for the involved participants (see Section 3.1).

3.3.2 | VVB opinion (to be completed by VVB, if applicable):

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, CPADD)	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 can be checked. Cross checking the same through other relevant documents such as statutory clearances. Logbooks can be checked randomly over video call/ by means of remote access, either synchronously (in real time) or asynchronously (when applicable) during remote inspection. screenshot of the logbooks can also be checked.	☒ **Yes** ☐ **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	☒ **Yes** ☐ **No**

	baseline and monitoring methodology.	certified versions of POA-DD / VPA-DD vis-à-vis their monitoring equipment/procedures and also to check records like logbooks, receipts and calibrations certificates etc.	
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). Furthermore, this can be cross verified by reviewing of all the calibration certificates and taking note of the date of calibration on each one for each specific monitoring equipment. Interviewing the relevant personnel to ensure that the calibration procedures are being followed as per the registered monitoring plan.	☒ **Yes** ☐ **No**
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 a project has adequate	☒ **Yes** ☐ **No**

	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 monitoring report can be cross-checked with other sources such as electricity/heat sales receipts/log. 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. Furthermore, appropriate/correct emission factor value has been applied or not.	☒ **Yes** ☐ **No**
6	Any outstanding FAR(s)/pending issue(s) since the previous physical site visit.	The identified risk is mitigated by reviewing the previous Verification report and found that no FAR is raised during last	☒ **Yes** ☐ **No**

		Monitoring Period.	
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.	☒ **Yes** ☐ **No**
8	Any design change(s)/temporary deviation(s) since the previous physical site visit.	The identified risk is mitigated by reviewing the previous verification report and found that design change is not available.	☒ **Yes** ☐ **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.)*

Please refer to the verification documents (including MR and ER sheets) uploaded on SC platform for revision for the 5 bundles of micro-scale VPAs cited above. The email exchanges between project participants, SustainCERT and Carbon Check is found in document: '20221110- Interim solution for Internal Verification'.

Version number	Release date	Description
5	11.04.2022	Additional information added: - 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