



DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**
Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 31/05/2022

1.2 | Decision

The applied deviation request is not approved. For VPA 48, though an online stakeholder consultation meeting has been conducted, the PD shall conduct a physical stakeholder meeting after the COVID situation eases in the relevant geographical area. The PD shall comply with the requirements set forth in section 2 of [COVID-19 Interim Measures](#).

This deviation is valid till the declared end date of the COVID 19: Interim Measures. The PD shall strive to conduct the physical stakeholder meeting at the earliest possible instance, keeping track of the evolving COVID-19 situation in the host country.

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

The validating/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 validation/verification report.

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

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**

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| Deviation Reference Number | COVID_DEV 263 | |
| Date of decision | 31/05/2022 | |
| Precedent (YES/NO) | No | |
| Precedent details | N/A | |
| Date of submission | 27/05/2022 | |
| Project/PoA/VPA | Project | ID – GSXXXX |
| | <input checked="" type="checkbox"/> PoA | ID – GS11189 |
| | <input checked="" type="checkbox"/> VPA | ID – Nigeria WPS VPAs: GS11259 to GS11288 Kenya WPS VPAs: GS11289 to GS11305 Nigeria ICS VPA: GS11306 And any VPAs that are included in future under the PoA |
| Project/PoA/VPA title | VPA title: Improved Cookstove and Safe Water Programme – Nigeria – VPA 01 to Improved Cookstove and Safe Water Programme – Nigeria – VPA 30 Improved Cookstove and Safe Water Programme – Kenya – VPA 31 to Improved Cookstove and Safe Water Programme – Kenya – VPA 47 and Improved Cookstove and Safe Water Programme – Nigeria – VPA 48 | |
| Date of listing | 11/10/2021 | |
| GS Standard version applicable | GS4GG | |
| Date of transition to GS4GG (if applicable) | Not Applicable | |
| Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable) | Not Applicable | |
| Date of design certification/inclusion (if applicable) | 16/02/2022 (date of 4 week design certification review period end) | |
| Location of project/PoA/VPA | Host country(ies): Nigeria and Kenya | |
| Scale of the project/PoA/VPA | <input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale | |
| Gold Standard Impact Registry link of the project/PoA/VPA | https://registry.goldstandard.org/projects/details/3177 | |

NGO communities, and other stakeholders on the design of the PoA. The PoA design consultation does not necessarily require a live meeting.....

6.1.3 In the case of multi-country PoA, the CME shall demonstrate that all relevant stakeholders across the different countries have been invited to provide feedback on the design of the PoA.

6.1.4 Stakeholder consultations at the VPA/CPA level shall comprise of a minimum two rounds of consultation including one mandatory physical meeting and one stakeholder feedback round lasting at least two months.....

6.1.5 For regular VPA/CPA, the physical meeting with stakeholders shall be conducted during the first round of consultation. For retroactive VPA/CPA, a physical meeting shall be held at the stakeholder feedback round if no physical meeting has taken place earlier or depending on the outcome of the detailed preliminary review or a VVB's request in case of Completeness Check pathway (Pathway 1).

6.1.7 In cases where only PoA level consultations are being conducted, a physical meeting for stakeholders is required at the PoA level in parallel to the design consultation. The physical meeting shall be followed by a Stakeholder Feedback Round at PoA level.....

Project scenario:

As per clause 6.1.1 of the GS4GG Programme of Activity Requirements" V1.2 above, CME has conducted stakeholder consultations at both PoA and VPA level.

As per clause 6.1.2 above, for the PoA level consultation, CME conducted the mandatory Design Consultation to obtain the feedback from relevant stakeholders. Given clause 6.1.2 does not mandate a live meeting for PoA level consultation, hence the design consultation was conducted virtually (by inviting feedback via email, phone calls and whatsapp messages). The design consultation report has been approved by SustainCert already.

The clause 6.1.7 becomes applicable if only PoA level "alone" consultation is conducted. Given in this PoA both PoA level and VPA level consultations have been conducted hence, clause 6.1.7 is not deemed applicable and there is no need to conduct a physical meeting for the PoA level consultation.

Therefore, COVID Interim Measures, version 3 - 18.12.2020, clause 2.2.1 is deemed not applicable for PoA level consultation.

For VPA level consultation, clause 6.1.4 above, requires minimum two rounds of consultation including one mandatory physical meeting and one stakeholder feedback round. Further as per clause 6.1.7, for retroactive VPA/CPA, a physical meeting shall be held at the stakeholder feedback round if no physical meeting has taken place earlier.

For VPAs 01-47, the systems under the concerned VPAs have been transferred from the CPAs under CDM PoA 9948. As part of CDM PoA 9948, stakeholder consultation meetings were undertaken at CPA level (covering a group of CPAs). The physical Local Stakeholder Consultation meetings were held on 14th March 2019 at 09:00

A.M. at the Best Western Hotel in Lagos, Nigeria¹ for WPS systems installed in Nigeria and on 20th March 2019 at 10:00 A.M. at La Maison, 9 Mogotio Rd, Westlands, Nairobi, Kenya² for WPS systems installed in Kenya. This is verifiable from the registered CPA-DDs under CDM PoA 9948. Thus, given a physical meeting has already been conducted for these CPAs under CDM PoA 9948, hence as per clause 6.1.7, physical meeting again for these CPAs is not deemed required.

For reference, the **TRF Guideline also corroborate the same as follows:**

“CPA that conducted a stakeholder consultation meeting to comply with CDM/other standard requirements, should conduct, at minimum, one round of consultation for identified gaps i.e., gaps due to differences in stakeholder consultation requirements of GS4GG and CDM/another standard. For instance, if original consultations only involve one physical meeting, CME/PD should conduct stakeholder feedback round covering all the identified gaps. The additional stakeholder consultations may involve a physical meeting or stakeholder feedback round, as necessary”

Considering aforesaid, the CME conducted VPA level stakeholder consultation (SFR), covering the identified gaps between CDM and GS4GG requirements for stakeholder consultation.

The SFR for the VPAs was initiated on May 14, 2021, it was due for closure on July 13, 2021. However, due to COVID, the CME extended the consultation time to provide equal opportunity to various stakeholders to revert. Hence, instead of the required 60 days period, the SFR feedback window had been kept open for more than 100 days and was closed on Tuesday, August 31, 2021.

Therefore, all VPAs created via transitioning systems from CDM PoA 9948 (i.e. VPA 01-47) are compliant with the requirements related to stakeholder consultation and do not require any physical stakeholder meeting.

Thus, for PoA level consultation (design consultation) and VPA level consultations (for VPAs 01-47), the “COVID 19: INTERIM MEASURES, v3-18.12/2020” clause 2.2.1 is not applicable as physical meeting is not being deferred.

VPA 48 (ICS VPA in Nigeria) is the only VPA that is purely greenfield VPA without any consultation history. Given no previous stakeholder consultation has been conducted for VPA 48, hence, PP conducted a live³ meeting, as part of VPA level consultations on Tuesday, August 31, 2021 (covering all VPAs).

Conducting a virtual live-stream meeting is deemed far better than conducting a one-point location, singular time event, physical meeting. A Physical meeting poses

¹

https://cdm.unfccc.int/filestorage/I/H/C/IHCEYXDKP4VRB3MQL7O8GNTSW60U1/PoA%209948%20Nigeria%20CPA77%20CPA-DD%20v1.0%2001042019?t=SDd8cmNqbDg3fDBRufFHTuy99FY9BTIW_2b

²

<https://cdm.unfccc.int/filestorage/6/F/D/6FD48B3VKPJAQSCNH0MYOG9EWZL5R7/PoA%209948%20CPA102%20Kenya%20CPA-DD%20v1.0%2001042019?t=SGh8cmNqampxfDBqNKVowQazF9yu5jIE68Ot>

³ A virtual meeting was conducted which was live-streamed in Kenya and Nigeria via google meet.

challenges to many with respect to participating in the event. The virtual meeting provided an option to stakeholders to participate in the consultation from the comfort of their home/office, also ensuring safety during COVID times. Had CME conducted a physical meeting then, no/little participation would have been possible. It is worth noting that the meeting was also attended by a GS representative, which would not have been possible, had the meeting been physically conducted in Nigeria/Kenya.

The CME would also want to highlight that conducting an online meeting, in no way, compromises the ability to give feedback / share grievances by those who do not have access to electronic media. Such stakeholders have an option of raising their concerns via the CME's customer care or by logging their feedback in the expression books kept in the country offices (continuous input / grievance mechanism). Details regarding continuous input / grievance mechanism was also communicated to the stakeholders via non-technical summary provided to stakeholders during SFR.

Lastly, the safeguarding principles assessment confirms that the PoA or the associated VPAs have little/no risks wrt to environmental / social / economic safeguards and hence need for a physical meeting additional to the meetings conducted by CME is deemed superfluous.

In light of aforesaid, Gold Standard is requested to confirm the following:

1. Clause 2.2.1 of the COVID Interim Measures not being applicable to PoA level consultation (Design consultation) as per clause 6.1.2 of the GS4GG PoA requirements, version 1.2
2. Clause 2.2.1 of the COVID Interim Measures not being applicable to VPA level consultations for VPA 01-47 as per clause 6.1.4 of the GS4GG PoA requirements, version 1.2 and TRF guidelines.
3. Exempting VPA-48 (ICS in Nigeria) from physical stakeholder consultation, given the requirements of the physical meeting have been covered in the google meet live streaming consultation already.

3.1.2 | VVB opinion (to be completed by VVB, if applicable):
Not Applicable

3.2 | Assessment of the deviation:

3.2.1 | Deviation assessment (to be completed by Project developer):
The deviation does not impact the applicability of the applied methodology, scale of the project, additionality or Emission reduction volumes.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):
Not Applicable

3.3 | Impact of the deviation:

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

No Impact envisaged

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

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 |