TEMPLATE

DEVIATION REQUEST FORM

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

A.   To be completed by Gold Standard

1| Decision

1.1 | Date – 15/06/2022

1.2 | Decision

The Deviation request **is not approved**, as a few relevant published reports as listed below are available:

1. Report: "Demand and Supply Dynamics of Wood Energy in Schools in Trans-Nzoia County, Kenya"[1], from which SDWS 8 could be cross-checked with section 4 regarding stove and fuel types. Publication date – March 2016
2. Report: "The impact of a school-based safe water and hygiene programme on knowledge and practices of students and their parents: Nyanza Province, western Kenya, 2006"[2] and "Assessment of the water facilities in primary

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[1] Available at https://ir-library.ku.ac.ke/bitstream/handle/123456789/14987/Demand%20and%20supply%20dynamics%20of%20wood.pdf?sequence=1
[2] https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2870759/

schools in the Niger Delta[3]" from which the SDWS 12 could be cross-checked. Publication date – September 2014

Statistic data from which the SDWS 25 could be cross-checked:

1. Kenya: "Secondary school enrollment in Kenya from 2015 to 2020"[4]; "2016 Basic Education Statistical Booklet"[5], "Education Sector Report Medium Term Expenditure Framework 2022/23 – 2024/25"[6]
2. Nigeria: Statistic website[7,8], National Education Profile[9]

Besides, the Demographic and Health Survey of Nigeria[10] and Kenya[11] could also be used for cross-checking the baseline survey data.
The publication dates need to be considered along with the conservativeness of the values provided.

The project developer shall apply these studies for cross-checking (in addition to further studies identified by the PD) and ensure conservativeness.

The validating VVB, through appropriate means at its disposal, shall review the sources cited, and their applicability and provide their opinion on the conservativeness of the baseline survey results.

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

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[3] https://www.researchgate.net/publication/265574095_Assessment_of_the_water_facilities_in_primary_schools_in_the_Niger_Delta_WASH_education_series_1
[4] https://www.statista.com/statistics/1136083/secondary-school-enrollment-in-kenya/
[5] https://www.education.go.ke/images/REPORTS/Basic-Education-Statistical-Booklet---2016.pdf
[6] https://www.treasury.go.ke/wp-content/uploads/2021/10/Education-Sector-Final-Report-13.10.2021.pdf
[7] https://www.statista.com/topics/6658/education-in-nigeria/#topicHeader__wrapper
[8] https://education.gov.ng/nigeria-digest-of-education-statistics/
[9] https://www.epdc.org/sites/default/files/documents/EPDC_NEP_2018_Nigeria.pdf
[10] https://dhsprogram.com/pubs/pdf/FR359/FR359.pdf
[11] https://www.dhsprogram.com/pubs/pdf/FR308/FR308.pdf

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_259	
Date of decision	15/06/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	24/05/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	☒ PoA	ID – GS11189
	☒ VPA	ID – **Nigeria WPS VPAs:** GS11259 to GS11288 **Kenya WPS VPAs:** GS11289 to GS11305 And any VPAs that are included in future under the Methodology for emission reductions from safe drinking water supply v1.0
Project/PoA/VPA title	**PoA title:** Improved Cookstove and Safe Water Programme **VPA title:** Improved Cookstove and Safe Water Programme – Nigeria – VPA 01 To Improved Cookstove and Safe Water Programme – Kenya – VPA 47	
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)	--	
Location of project/PoA/VPA	Host country(ies): Nigeria and Kenya	
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/details/3177	

Status of the project/PoA/VPA	☐ New ☒ Listed ☐ Certified design ☐ Certified project
Title/subject of deviation	Deviation from Monitoring methodology - Methodology for emission reductions from safe drinking water supply v1.0 dated 03/05/2021
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Methodology for emission reductions from safe drinking water supply v1.0 dated 03/05/2021 Parameters: ID SDWS 8, SDWS12, SDWS 25. Any comment/QA-QC procedure provided for "The value applied shall be cross-checked against at least one other source on the list. For cross-check purposes, sources applied may be up to 5 years old. Further, cross-check with older sources may be used provided they provide conservative results"
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/01/2021 End date 31/12/25 Not Applicable
Submitted by	Contact person name: Rohit Lohia Email ID: rohit.lohia@climate-secure.com
	Organisation: Climate Secure India Private Limited
	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: Earthood Services Private Limited VVB Staff name(s): Shreya Garg
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☒ No ☐ Dev_184, Date of approval: 07/12/2021 Dev_263, Date of approval: 31/05/2022

3| Deviation detail

3.1 | Description of the deviation:

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

The deviation pertains to deviation from the following requirement of applied methodology:" Methodology for emission reductions from safe drinking water supply v1.0 dated 03/05/2021",

Parameter ID	SDWS 25
Data/Parameter:	$HN_{p,y}$
Data unit:	Number
Description:	Number of individuals per premises type p in the project boundary in year y
Source of data:	Any of the following sources shall be used: - Project survey - Official government publications or statistics - Credible published literature for project region, or - Studies by academia, NGOs or multilateral institutions Source applied must not be more than 3 years old. When a project survey is used, follow the section 4.2 |General requirements for sampling, below.
Monitoring frequency:	Annual
QA/QC procedures:	The value applied shall be cross-checked against at least one other source on the list. For cross-check purposes, sources applied may be up to 5 years old. Further, cross-check with older sources may be used provided they provide conservative results.

Parameter ID	SDWS 8
Data/Parameter:	x_f
Data unit:	Percentage of fuel f use in target population
Description:	The proportion of each different cooking fuel f used in the project boundary by end-users: - % among the target population if single fuel is used for water boiling. For example, the target population either use wood or charcoal - 60% end users use wood and 40% charcoal. - Weighted average on energy basis, if multifuel situation exists within premise. For example, a household that uses 1000 kg fuelwood per year and 500 kg charcoal per year for cooking and water boiling uses 51.4% fuelwood and 48.6% charcoal on an energy basis. If the project covers different types of end-users premises (e.g. households, schools), then the fuels used in the geographical area of the project by the same types of end-users are to be determined for each end-user premises type. Undertake assessment at the start of each crediting period.
Source of data:	Any of the following sources shall be used: - baseline survey, - credible published literature for project region, - studies by academia, NGOs or multilateral institutions, or - Official government publications or statistics Source applied shall not be more than 3 years old. When a baseline survey is used, follow the 4.2 | below.
Any comment:	Applies to all project technology types. The percentages applied shall be cross-checked against at least one other source on the list. For cross-check purposes, sources applied may be up to 5 years old. Further, cross-check with older sources may be used provided they provide conservative results

Parameter ID	SDWS 12
Data/Parameter:	C_b
Data unit:	Percentage
Description:	Proportion of project end-users who in the baseline were already using safe water, either from an improved water source, or from a water treatment method other than boiling. At the start of each crediting period.
Source of data:	Any of the following sources shall be used: - Baseline survey - Credible published literature for project region - Studies by academia, NGOs or multilateral institutions - Official government publications or statistics Source applied must not be more than 3 years old. When a baseline survey is used, follow the 4.2 | below.
Any comment:	The percentages applied shall be cross-checked against at least one other source on the list. For cross-check purposes, sources applied may be up to 5 years old. Further, cross-check with older sources may be used provided they give conservative results (for example, an older source shows that in the past, fewer end-users were already using safe water).
	The safe water sources and percentages shall be consistent with the information reported for parameter *Water sources in the*

for Parameter ID SDWS 8, SDWS12, SDWS 25.
"The value applied shall be cross-checked against at least one other source on the list. For cross-check purposes, sources applied may be up to 5 years old. Further, cross-check with older sources may be used provided they provide conservative results"

All the VPAs listed above pertain to IWT (installed in schools) in Kenya and/or Nigeria. Credible published literature for project region, studies by academia, NGOs or multilateral institutions, or Official government publications or statistics to cross check the value used for Parameter ID SDWS $8(x_f)$, SDWS12(C_b) and SDWS 25($HN_{p,y}$) is available for schools in neither of these two countries.

It is because of this reason the CME has used baseline surveys results in case of SDWS $8(x_f)$, SDWS12(C_b) and actual project data in case of SDWS 25($HN_{p,y}$) to establish the parameter values, given, there is no study ever conducted for schools in Nigeria and Kenya that can be used to cross check these parameter values.

For C_b and x_f (ex-ante fixed parameters), the CME conducted a baseline study in Kenya and Nigeria (separately) conducting surveys in >150 schools to capture information on the baseline scenario. The data collected has already been validated by the VVB by interviewing the baseline samples.

For Parameter $HN_{p,y}$ (ex-post monitoring parameter) actual data from all schools in the project has been considered. The CME has collected population data for each of the ~30,000 schools covered under VPA 01-47 and have provided the same to GS. The value used for ex-ante calculations is average of this data and hence is deemed most accurate for the purpose of ER calculations.
For ex-post monitoring, the CME shall be using actual data captured from all schools covered under the VPA. As per the proposed monitoring plan, $HN_{p,y}$ shall be determined using actual data from each school in the PoA. Given actual data shall be used, getting this cross verified from another third-party source is deemed futile.

Seeking to cross verify, a monitoring parameter value, with external sources is deemed superfluous as monitoring data will change with every monitoring event and may change (reduce/increase) with time. Further, the methodology does not specify the range within which values from other external sources shall be deemed acceptable. It is not possible that the actual project monitoring parameter value matches exactly with that reported in external source. The methodology lacks clarity on the allowed degree of variance between actual monitored parameter value and the value reported in other cross check source.

In PP's opinion, the cross check is more suited to these parameters when applied to HWT and CWT systems for which demographic studies are generally available (credible published literature, studies by academia, NGOs of multilateral institutions, official government publication /statistics).

The non-availability of cross check data sources (For schools in Nigeria and Kenya) is outside the control of the CME. Thus, in light of aforesaid, the application of cross check is not deemed appropriate and is rather prohibitive to the PoA.

Therefore, CME seeks exemption from the requirement of methodology i.e cross-checking the value applied with other source for Parameter ID SDWS 8(x_f), SDWS12(C_b) and SDWS 25($HN_{p,y}$).

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

For the parameters SDWS 8(x_f) and SDWS12(C_b):
The methodology requires the aforesaid parameter values, established via baseline surveys, to be cross checked with either of the following:
   1. Credible published literature for project region
   2. Studies by academia, NGOs or multilateral institutions
   3. Official government publication or statistics.

The VVB team, based on independent research, professional experience and assessment of information available in the public domain confirms that no published literature, studies or official statistics were found available, providing information on the aforesaid parameters for the schools in Nigeria and Kenya, as a cross check.

To validate the assertion made by the CME (baseline survey), the VVB team checked, via conducting interviews of school representatives, on a sampling basis, the information in the baseline surveys wrt to these parameters. Detailed assessment can be found in the validation report.

VVB team also consulted the local expert, and a general opinion was gathered in addition to the feedback received from sampled user interviews to confirm that the information presented in the baseline survey reflects the situation on ground.

For monitoring parameter ID SDWS 25($HN_{p,y}$):
The methodology requires the aforesaid parameter values, established via Project survey, to be cross checked with either of the following sources:
   1. Credible published literature for project region
   2. Studies by academia, NGOs or multilateral institutions
   3. Official government publication or statistics.

Instead of a project survey, the CME has submitted to the validation team, the database of entire project population (i.e. ~18,000 schools in Nigeria and ~10,000 schools in Kenya). This database lists the number of persons in each of these ~28,000 schools.

Thus, the CME is deemed to have covered 100% of its population in the project survey which is deemed most accurate and perfect representation of the project population. Thus, the VVB team confirms this to be better than comparing results of a sampling-based survey with other sources. This is further substantiated by the proposed monitoring plan in the VPA-DD which mandates the parameter value for **$HN_{p,y}$** to be collected for each school.

Further, the VVB team confirms based on independent research, professional experience and assessment of information available in the public domain confirms that no published literature, studies or official statistics were found available, providing information on the average population size of the schools in Nigeria and Kenya, as a cross check.

3.2 | Assessment of the deviation:

3.2.1 | Deviation assessment (to be completed by Project developer):
Apart from deviation from the stated rule, the project complies with all other requirements of the monitoring methodology the principles of accuracy, completeness, and conservativeness.

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

As stated above, the values established via baseline surveys (x_f and C_b) or actual project data ($HN_{p,y}$) are correct and acceptable and free from any material errors. In absence of this data in public domain (published literature, studies or official statistics), the approach adopted by CME is deemed most appropriate under the principles of accuracy, completeness, and conservativeness.

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):

No Impact envisaged

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: - 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

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