



**OPTIONAL REQUIREMENT**

## **GOLD STANDARD FOR THE GLOBAL GOALS**

### **DEVIATION APPROVAL REQUIREMENTS AND PROCEDURES**

**Publication date:** ~~1103~~<sup>ed</sup>/~~045~~<sup>1</sup>/~~2022~~<sup>1</sup>

**Version:** ~~1.2~~<sup>1</sup>

NEXT UPDATE: 16.07.2023

#### **TABLE OF CONTENTS**

1  SCOPE AND APPLICABILITY	2
2  PRINCIPLES AND DEFINITIONS	2
3  REQUIREMENTS	3
4  REQUIREMENTS FOR VVBS	4
5  DEVIATION APPROVAL PROCEDURE	3
5.1   SUBMISSION OF REQUEST FOR DEVIATIONS	5
5.2   PROCESSING THE REQUEST FOR DEVIATIONS	65
6  ACCESS TO APPROVED DEVIATIONS	76

## 1| SCOPE AND APPLICABILITY

- 1.1.1 | This document outlines key principles, requirements and approval procedures for projects seeking:
- Deviation from Gold Standard for the Global Goals (GS4GG) requirements and SDG Impact Quantification Methodologies and/or applicable methodologies prior to submission for certification with GS4GG.
  - Temporary changes to a certified project - which include changes from the registered monitoring plan, the applied methodologies or other standard documents - that are expected not to occur beyond a given monitoring period.

For a deviation approval, project developers shall submit the required documents and/or send notification to SustainCERT [at help@sustain-cert.com](mailto:help@sustain-cert.com). Project developers seeking permanent<sup>1</sup> changes to a registered project activity, shall follow the [Design Change Approval Procedure](#).

- 1.1.2 | Any clarifications on Gold Standard for the Global Goals (GS4GG) Requirements and SDG Impact Quantification methodologies/or applicable methodology can be sought at any time and do not require a deviation to be submitted. Clarifications can be submitted to SustainCERT at [help@sustain-cert.com](mailto:help@sustain-cert.com).

## 2| PRINCIPLES AND DEFINITIONS

### 2.1 | Principles

- 2.1.1 | Projects seeking a deviation must ensure that the following principles are adhered to -
- **Environmental integrity:** Gold Standard certified products e.g. GS VERs and/or statements shall not be overestimated as a result of the deviation, and conservativeness must be ensured
  - **Contribution to the Sustainable Development Goals (SDGs):** SDG contributions that the project is designed to achieve must be in line with GS4GG requirements and are not compromised

---

<sup>1</sup> Changes that alter the project design and are permanent in nature are considered as a permanent change. The permanent change may have an impact on certified project design with regards to one or more of following project aspects, although not limited to; applicability of the methodology, compliance with registered monitoring plan, scale of the project, safeguarding assessment, stakeholder consultation, sustainable development impact, applicable legal requirements.

~~OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure~~**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure** **Deviation Approval Procedures**

- **Safeguarding principles and requirements:** Projects must be in line with [Safeguarding principles and requirements of GS4GG](#)
- **Compliance with host country regulations:** Projects must not conflict with host country regulations

## 2.2 | Definitions

2.2.1 | The following actions constitute a project deviation, when a project [temporarily deviates, or is at risk of deviating](#) from:

- Applicable requirements listed in the following GS4GG documents<sup>2</sup>:
  - Principles and Requirements
  - Activity Requirements
  - Product Requirements
  - Context Requirements
- Requirements listed in an applicable SDG Impact Quantification methodology
- Its approved monitoring plan

## 3 | REQUIREMENTS

3.1.1 | The project developer or coordinating/managing entity (CME) shall identify and document any actual or proposed temporary changes<sup>3</sup> to the implementation, operation or monitoring of the certified project activity, Programme of Activities (PoA) or included VPAs. Hereafter, 'project activity' refers to project activity, PoAs or included VPAs, unless stated otherwise.

3.1.2 | If there is any actual or proposed temporary change to the implementation, operation or monitoring of a certified project activity, the project developer/CME **IS RECOMMENDED TO** submit the following information/documents, **REFLECTING THE TEMPORARY DEVIATION**, as part of the request for approval of temporary changes:

- PDD, PoA DD or VPA DD (in both track-change and clean versions) that reflects the actual or proposed changes
- Monitoring report, where applicable

---

<sup>2</sup> [And any rule updates applicable to them](#)

<sup>3</sup> A Certified Design project requesting to include new technology/measures shall submit the request for approval of design change to Gold Standard within one year of the start date of the proposed technology/measures (design change component). If the developer fails to submit the request for approval within one year, the design change component shall not be eligible for Gold Standard Certification. Paragraph 4.1.49, [Principles and requirements](#)

~~OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure~~**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure** **Deviation Approval Procedures**

- c. Deviation request form, summarising the temporary changes and the impact(s) of these changes on the relevant aspects of the project, including the reasons for the changes and any additional information relating to the changes.
  - d. Any other supporting documentation (for example, Environmental Impact Assessment conducted in relation to the changes in the project, licenses etc.) shall be provided along with the documents listed above.
- 3.1.3 | Project ~~d~~developers shall explain the nature, scope of the temporary change(s), extent and duration of the non-confirming monitoring period in the Monitoring Report and shall provide all supporting documentation.
- 3.1.4 | Project ~~d~~developers shall also:
- a. Propose alternative monitoring arrangements for the non-confirming monitoring period. In this case, the project developers shall apply conservative assumptions or discount factors to the calculations to the extent required to ensure that GHG emission reductions or net anthropogenic GHG removals will not be overestimated as a result of the deviation; or
  - b. Apply the following most conservative values approach when alternative monitoring arrangements are not proposed. This does not require approval by the Gold Standard Secretariat:
    - i. Apply zero for baseline GHG emissions for the entire non-confirming monitoring period; and/or
    - ii. Apply the values assuming that the source of GHG emissions is operated at the maximum capacity for the entire non-confirming monitoring period.
    - iii. For project GHG emissions related to the consumption of electricity, add 10 per cent to account for transmission and distribution losses.
- 3.1.5 | Project developers shall confirm in the monitoring report that the changes have occurred due to reasons beyond their control but is temporary in nature and the project will revert back to its original design after a given monitoring period.

#### **4| REQUIREMENTS FOR VVBs**

- 4.1.1 | ~~T~~The VVB shall determine (where requested ~~red~~ by either SustainCERT and/or the Gold Standard Secretariat on a case-by-case basis):
- a. Whether there is a temporary change from the registered monitoring plan, and, if there is, determine whether the change complies with the relevant requirements stated in paragraphs 3.1.3 & 3.1.4 above, as applicable

**OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure**  
**OPTIONAL REQUIREMENT 110\_V1.2\_PAR\_Deviation Approval procedure** Deviation Approval Procedures

- b. Whether the project developers have proposed alternative monitoring arrangements or applied the most conservative values approach for the non-conforming monitoring period
- c. Where alternative monitoring arrangements have been proposed, whether the arrangements apply conservative assumptions or discount factors to the calculations to the extent required to ensure that GHG emission reductions or net anthropogenic GHG removals will not be overestimated as a result of the deviation

4.1.2 | For cases where a temporary change from the registered monitoring plan may be applicable to the monitoring period under verification and part of the subsequent monitoring period, the VVB shall determine the exact period to which the temporary change applies.

4.1.3 | The VVB shall state its opinion on whether the deviation complies with the relevant requirements stated in paragraphs 3.1.3 & 3.1.4 above, as applicable.

**5 | DEVIATION APPROVAL PROCEDURES**

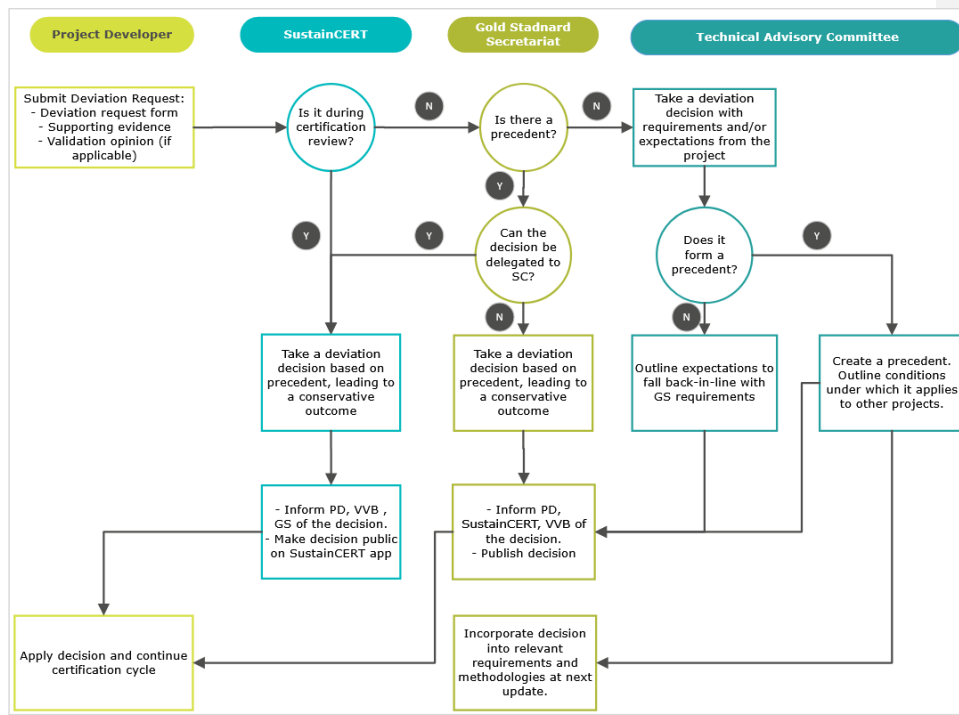


Figure 1: Deviation approval procedures

## 5.1 | Submission of request for deviations

5.1.1 | Deviation requests shall be submitted to SustainCERT at [help@sustain-cert.com](mailto:help@sustain-cert.com) with including:

- a. a complete [Deviation Request form](#)
- b. [all evidence supporting the deviation reasons and proposed approach as per paragraphs 3.1.3 & 3.1.4.](#)
- ~~a-c.~~ [VVB opinion \(if required, as per section 4- above\)](#)

## 5.2 | Processing the request for deviations

5.2.1 | The deviation requests are processed as outlined below.

### a. Outside Certification Review

~~5.2.1~~5.2.2 | \_\_\_\_\_ When a new project deviation without any precedent of TAC approval is submitted, the Gold Standard Secretariat will present the request to the TAC for decision, at the earliest possible opportunity. The decision confirms approval or rejection of the request. It will also outline any requirements and/or expectations from the project, as applicable, in light of the deviation from GS4GG requirements. The decision will be communicated to the project developer and/or VVB as part of the deviation form.

~~5.2.2~~5.2.3 | \_\_\_\_\_ Deviations that are approved by TAC will either set a precedent for other projects to apply or will be limited to a specific project, e.g. if a project faces unique circumstances arising from force majeure conditions. For project specific deviations that do not apply to other projects, the approval decision should clearly define the expectations to fall back in-line with Gold Standard requirements as project circumstances return to normal.

~~5.2.3~~5.2.4 | \_\_\_\_\_ When a project deviation with precedent (i.e., TAC has previously approved a similar deviation) is submitted, the Gold Standard Secretariat will decide on the deviation request in line with previous decisions approved by TAC or may delegate to SustainCERT if precedent exists and the decision is clear.

### b. Part of Certification Review

~~OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure~~**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure** **Deviation Approval Procedures**

**5.2.5 |** When a deviation is identified by SustainCERT or submitted by PD/VVB as part of the certification process, i.e. design or performance certification etc, SustainCERT shall assess the deviation and decide on the deviation request, leading to ~~the a~~ conservative outcome as part of the certification decision. SustainCERT shall take into account any precedents available, based on earlier TAC decisions. It should also be ensured that such deviations are restricted to a specific period and do not become a norm.

~~5.2.4~~**5.2.6 |** Should there be no precedent for a deviation submitted during the certification process, or should there be specific circumstances which make it unclear whether a precedent applies, SustainCERT may forward the deviation request to the Gold Standard Standard secretariat, which will proceed as per the process outlined in point 5.2.1.a. Outside Certification Review above.

**c. Creation of Precedent**

~~5.2.5~~**5.2.7 |** When a decision by the Gold Standard TAC on a deviation request constitutes a precedent, i.e. the approved deviation can also be applied by other projects, this shall be mentioned and outlined in the deviation form. Conditions under which the approved deviation can be applied by other projects shall be clearly defined.

~~5.2.6~~**5.2.8 |** Gold Standard will ensure that the deviation precedents are incorporated in the relevant requirements or methodologies at the time of the next revision/update. In the interim, deviation precedents may also be published as a rule update/clarification on the Gold Standard website.

**6| ACCESS TO APPROVED DEVIATIONS**

6.1.1 | All deviations and associated documents submitted for approval will be made publicly available. The project developer may request to retract any confidential information informing SustainCERT at the time of submission of a request.

6.1.2 | The deviation decisions, ~~including the deviation request forms, will~~ shall be made publicly ~~available using one of the following platforms, as applicable:~~

- a. ~~Project level deviations—These deviation forms will be u~~Uploaded on a~~Within the~~ project page ~~of~~ in the SustainCERT application, ~~and made publicly available on the Gold Standard Impact Registry~~registry;
- b. On the deviation page in the Gold Standard for the Global Goals website~~Project level deviations that result in a precedent—the deviation form will be made publicly available on the Gold Standard website.~~

~~OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure~~**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure** **Deviation Approval Procedures**

6.1.3 | Supporting documents submitted along with the deviation request form will not be made publicly available. Project developerPDs shall ensure that confidential information is provided in supporting documents and not in the deviation request form.

## **7 | RECONSIDERATION OF DEVIATION DECISIONS**

### **7.1 | Roles & Responsibilities**

7.1.1 | **Project developer** - ~~A legitimate project developer/representative as appointed/assigned the role in the Cover Letter can submit~~ A request for a reconsideration of a deviation decision, can only be submitted by the project developer/representative appointed/assigned the role of project developer in the cover letter.

7.1.2 | **Validation Verification Body** – A VVB, where involved in deviation assessment and evaluation shall also provide opinion on the request for reconsideration.

7.1.3 | **SustainCERT** - SustainCERT shall conduct a completeness check, assess the reconsideration request, and submit its opinion to Gold Standard Secretariat/TAC for review and decision making.

7.1.4 | **Gold Standard Secretariat** – The Gold Standard Secretariat shall conduct preliminary assessment and facilitate the procedure.

7.1.5 | **Technical Advisory Committee** - As per the deviation requests procedure, ~~the deviation decisions though mandated to Secretariat/SustainCERT in some cases,~~ are made by the TAC, thus the reconsideration shall also be decided upon by the respective TAC, or by a the-mandated Reconsideration Committee formed of by at least 2 TAC members. ~~of the TAC~~

### **7.2 | Requirements for Reconsideration Requests**

7.2.1 | The submission of a request for reconsideration of a decision shall be made by ~~the a-legitimate-p~~Project dDeveloper within 60 days of the original deviation decision being communicated to ~~the p~~Project dDeveloper.

7.2.2 | A reconsideration request can be made by a pProject dDeveloper in cases where deviation decision leads to:

- a. rejection or deregistration of an activity
- b. rejection of issuance requests in full or at minimum more than 25% of requested volume
- c. material financial and/or other implications (aAny claim of financial non-viability/project endangerment as a result of a deviation decision will need to show a before and after scenario and provide objectively verifiable evidence in support of the claim.)



~~OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure~~OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure Deviation Approval Procedures

7.2.3 | The reconsideration request shall include the following information:

- a. The original deviation request form, including the deviation decision.
- b. Information, evidence, or argumentation additional to the ones presented in the original deviation requests that underpin the reconsideration request. This may include, among others:
  - i. Evidence, information, or data about the project’s circumstances
  - ii. References to applicable Gold Standard rules and requirements
  - iii. Evidence of/reference to communication with Gold Standard or SustainCERT
  - iv. Background information included but not limited to calculations, experts’ opinions, references to laws, official statistics, public policies, academic articles, etc.
- c. VVB opinion: If the deviation request involves VVB opinion, the additional information, evidence or argumentation provided as the basis for the reconsideration request shall be reviewed by the VVB and their opinion included in the reconsideration request.
- d. Submission fee: A fee of \$1000 per deviation request shall be paid. In case the deviation decision is overturned: the fee will be returned to the Project Developer by means of discounting it from the next applicable fee i.e., preliminary review, project design review, performance review or crediting period renewal review fee, whichever is first. In case the deviation decision is upheld, the fee will be retained by Gold Standard.
- e. The Project developer shall request reconsideration for each deviation decision individually.

7.2.4 | A reconsideration request is not required should there be a mistake/error in the deviation decision. For example – if different rules, requirements or procedures than those referred to in the deviation decision were actually applicable to the project activity. In such cases, the Project Developer may solicit a correction of the deviation decision by the Gold Standard Secretariat, pointing out the applicable rule, requirement, or procedure, as follows:

- a. If the decision was taken during a certification process by SustainCERT, the Project Developer shall contact SustainCERT with the request for correction at [compliance@sustain-cert.com](mailto:compliance@sustain-cert.com) and [cc standards@goldstandard.org](mailto:standards@goldstandard.org)

~~OPTIONAL REQUIREMENT-110\_V1.1\_PAR\_Deviation Approval procedure~~  
~~OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure~~ **Deviation Approval Procedures**

- b. If the decision was taken outside of a certification review process by Gold Standard (and/or the TAC), the pProject dDeveloper shall contact the Gold Standard secretariat at standards@goldstandard.org.

### **7.3 | Procedure**

- 7.3.1 | The Project Developer/Representative (PD) shall submit the request for reconsideration of a deviation decision with required documents to compliance@sustain-cert.com and cc standards@goldstandard.org.
- 7.3.2 | SustainCERT shall conduct the completeness check and acknowledge the receipt informing the project developer within 2 weeks of the submission if the reconsideration criteria have or have not been met (original deviation decision lead to one of the possibilities given in section 7.2.2. above and additional information is given with attached evidences). SustainCERT may provide an additional opportunity to the PD project developer to supply further information if the criteria could be met.
- 7.3.3 | SustainCERT shall take a decision on whether to progress the reconsideration request or not. The decision is final.
- 7.3.4 | If the reconsideration request has not been progressed, SustainCERT shall provide an explanation to the project developer-Project Developer.
- 7.3.5 | If the request has been progressed, the following procedure applies:
  - a. SustainCERT shall inform Gold Standard Secretariat of the reconsideration request and submit all relevant documentation (including correspondence) at least two weeks in advance of the next scheduled TAC call.
  - b. Gold Standard shall issue an invoice for \$1000 per reconsideration request.
  - c. The pProject dDeveloper shall pay the invoice, preferably within 14 days of receipt to ensure a timely consideration of the reconsideration request.
  - d. The Gold Standard Secretariat shall inform the Project Developer/SustainCERT of the TAC meeting date on which the Reconsideration Committee will be appointed. If delays are expected, these shall be communicated accordingly.
- 7.3.6 | The Secretariat shall propose an Reconsideration Committee in consultation with the Technical Advisory Committee Chair and Vice-Chair considering the following:
  - a. At least two members of the respective TAC,
    - i. the members shall be different from those who assessed and made a decision on the original deviation request (this does not apply when deviation is decided by the full TAC)
    - ii. the members should have the subject matter expertise

**Commented [CW1]:** To check this is correct - SustainCERT has the final say on whether a reconsideration request is to be progressed or not?

**Commented [CW2]:** What happens if it's not progressed and PD doesn't agree with SC's explanation?

~~OPTIONAL REQUIREMENT-110\_V1.1\_PAR\_Deviation Approval procedure~~**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure** **Deviation Approval Procedures**

- iii. if needed, an external subject matter expert may be engaged, however any expenses to such engagement in full shall be paid by the project developer
- b. A Secretariat member to facilitate the process. The Secretariat representative shall not have participated in deviation review and shall not take part in the decision making on the reconsideration request.

~~OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure~~**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure** **Deviation Approval Procedures**

- 7.3.7 | The Reconsideration Committee shall be confirmed by the TAC in regular call or via email confirmation from TAC members.
- 7.3.8 | The Reconsideration Committee shall decide on the request after reviewing all related relevant information and correspondence, including related to the precedent, based on which the initial deviation decision was taken (if applicable).
- 7.3.9 | The Reconsideration Committee may decide upon the request, or may forward the recommendation to the full TAC (Energy or Land Use and Forests) depending on the nature of request and its implication to similar project activities. The Reconsideration Committee decision is final.
- 7.3.10 | Upon conclusion of the request, the Secretariat shall share the decision with the pProject dDeveloper, VVB, SustainCERT and any other stakeholders (if applicable)
- 7.3.11 | Gold Standard/SustainCERT shall maintain transparent record of all reconsideration decisions.
- 7.3.12 | Should the decision warrant a wider clarification/rule update or removal/replacement of a precedent for future deviations, if necessary, the Secretariat shall follow the applicable procedure to communicate with all stakeholders/project developers, as required.
- 7.3.13 | The Gold Standard Secretariat shall publish the decision(s) on its website and mark if it forms a precedent for future projects
- 7.3.14 | The Gold Standard Secretariat shall remove/replace any previous precedents, as recommended by the Reconsideration Committee.
- 7.3.15 | SustainCERT shall make the reconsideration decision public on the SustainCERT application.

**OPTIONAL REQUIREMENT 110\_V1.1\_PAR\_Deviation Approval procedure**  
**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure**  
**Deviation Approval Procedures**

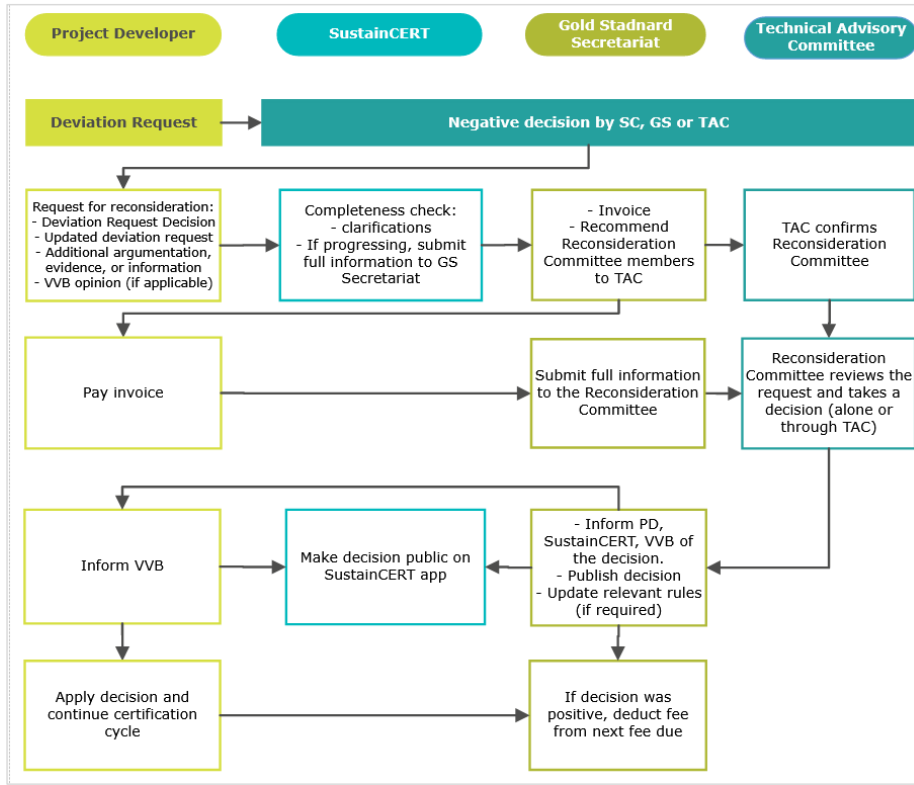


Figure 24: Deviation reconsideration procedure process flow

**7.4 | Documentation**

- 7.4.1 | The project developer shall use the relevant section of deviation request form for information with regards to the reconsideration request.
- 7.4.2 | If the initial deviation request form contained a VVB opinion, the additional information, evidence or argumentation provided shall be reviewed by the VVB and their opinion included in the deviation request form.
- 7.4.3 | All changes in the deviation request form shall be in track changes.

**Document Revision History**

Version number	Release date	Description
1.2	11.04.2022	Clarification on submission and access to deviation decisions.

~~OPTIONAL REQUIREMENT-110\_V1.1\_PAR\_Deviation Approval procedure~~**OPTIONAL REQUIREMENT-110\_V1.2\_PAR\_Deviation Approval procedure** **Deviation Approval Procedures**

		<u>Clarification on the process when there is no precedent.</u> <u>Clarification on the need to for a VVB opinion</u> <u>Addition of section on reconsideration deviation decisions</u> <u>Editorial changes.</u>
<u>1.1</u>	<u>14.01.2021</u>	<u>Addition of sections on requirements and requirements for VVBs.</u>
<u>1</u>	<u>6.07.2020</u>	<u>Initial adoption</u>