



**Gold Standard**<sup>®</sup>  
for the Global Goals

**CORE DOCUMENT**

## **DESIGN CHANGE REQUIREMENTS**

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**PUBLICATION DATE** 14/01/2021

**VERSION** 1.0

**RELATED DOCUMENTS**

– [Principles and Requirements v.1.2](#)

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### **SUMMARY**

This document provides the requirements and approval procedures for project developers/CMEs seeking permanent changes to the implementation, operation and/or monitoring of a certified project activity/PoA. This document was formally included as Annex-A (Design Change Approval Procedure) of the [Gold Standard Principles and Requirements](#) (version 1.2 published October 2019). Apart from being released as a new and standalone standard document, this document release is intended to provide enhanced clarity on the nature of permanent changes (as allowed under GS4GG) and circumstances that require design change approval from the Gold Standard.

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## 1| SCOPE AND APPLICABILITY

- 1.1.1 | This document outlines requirements and approval procedures to seek permanent changes - proposed or actual - to implementation, operation or monitoring of a certified project activity.
- 1.1.2 | For the design change approval of a certified project, project developers shall submit the required documents and send notification to SustainCERT.
- 1.1.3 | Project developers seeking temporary change from registered monitoring plan<sup>1</sup> or an interim deviation from Gold Standard for the Global Goals (GS4GG) requirements and SDG Impact Quantification Methodologies or applicable methodologies for activities prior to project submission for certification with GS4GG, shall follow the [Deviation Approval Procedures](#).
- 1.1.4 | 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@sustaincert.com](mailto:help@sustaincert.com) with the email subject line - 'Clarification Request'.

## 2| GENERAL REQUIREMENTS

- 2.1.1 | If there is any change regarding the cover letter, project ownership, change of coordinating/managing entity and others after the request for registration, the project developer shall submit the applicable revised document(s) signed by all entities involved, to SustainCERT.
- 2.1.2 | The project developer and/or coordinating/managing entity (CME) shall identify and document any actual or proposed changes<sup>2</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, Programme of Activities (PoA) or included VPAs, unless stated otherwise.
- 2.1.3 | CDM PoAs and CPAs seeking labeling under GS4GG, shall refer to the CDM requirements on Design Change as stated in the Project Standard for Project Activities/PoAs.

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<sup>1</sup> The monitoring plan outlined in PDD at the time of project registration.

<sup>2</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](#)

- 2.1.4 | If there is any actual or proposed change to the implementation, operation or monitoring of a certified project activity, the project developer/CME shall submit the following information/documents as part of the request for approval of permanent changes:
- a. PDD, PoA-DD or VPA-DD (in both track-change and clean versions) that reflects the actual or proposed changes;
  - b. Design Change Memo, summarising the design changes and outlining 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;
  - c. 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;
  - d. VVB opinion on the design change, where required.
- 2.1.5 | The project developer shall determine and appropriately justify whether the actual or proposed changes are permanent changes as defined in paragraph 3| below. Unless otherwise stated in the provisions below, the design changes require approval by SustainCERT.

### 3| DESIGN CHANGE REQUIREMENTS

#### 3.1 | PERMANENT CHANGES

- 3.1.1 | Changes that alter the project design and are permanent in nature are considered as a permanent change. The permanent change may impact the certified project design with regards to one or more of following project aspects, but not limited to; applicability of the methodology, compliance with the registered monitoring plan, scale of the project<sup>3</sup>, safeguarding assessment, stakeholder consultation, sustainable development impact, applicable legal requirements etc.
- 3.1.2 | **Corrections** that involve changes in the project information that affect the design of the project, for example - project information or ex-ante parameters

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<sup>3</sup> The scale of the project is not only defined by the maximum power generation capacity for power projects and maximum threshold of energy savings for energy efficiency project, but also refers to the volume of emission reductions from a project.

fixed<sup>4</sup> at registration of the project activity as described in the registered PDD. The project developer shall make corrections in a revised PDD. Such changes do not require approval from SustainCERT, unless VVB determines otherwise.

3.1.3 | **Changes to the start date of the registered crediting period:** the project developer may make the following changes to the start date of the registered crediting period:

- a. Bringing forward the crediting period start date up to one year earlier than that indicated in the registered PDD, taking into account that the start date shall not be earlier than two years<sup>5</sup> from date of registration and/or start date of the project, whichever occurs later;
- b. In case the start date of the Crediting Period is after the date of Project Design Certification, a certified project activity is not required to request approval for the changes summarised in the table below, but shall instead notify SustainCERT of the changes;

Table: 1

Change from registered crediting period start date	Project location	Requirements <sup>6</sup>
Up to one year	All locations	No Justification and/or approval is required
Between 1-2 year	All locations	At the time of verification, the project should: <ul style="list-style-type: none"> <li>i. Demonstrate that no changes have occurred to the project activity that would result in a less conservative baseline, or update the baseline using conservative data.</li> <li>ii. Demonstrate that substantive progress has been made by the project developer to start the project activity.</li> </ul>

- c. The project developer shall request approval from SustainCERT to change the crediting period start date; if the proposed change is between two years to four years and the project activity is located in host country other than LDC, LLDC and SIDC the project developer shall:
  - i. demonstrate that the project activity remains additional.

<sup>4</sup> This provision does not allow the parameter values fixed ex ante at the time of the registration of the project activity to be updated, as it is not regarded as a correction.

<sup>5</sup> In case of A/R and Agriculture Projects it is maximum three years prior to Project Design Certification.

<sup>6</sup> paragraph 6.1.3, GHG Emission reduction & sequestration product requirements

- ii. demonstrate that the original baseline scenario established in the registered PDD remains valid, or update the baseline scenario using the latest data, as appropriate.
  - iii. if the methodology version has been updated, the defaults for e.g., emission factors etc. shall be updated in line with the recent methodology version.
  - iv. demonstrate that substantive progress has been made by the project participants to start the project activity.
- d. The project developer of a registered Land Use & Forestry (LUF) project activity, such as Afforestation/Reforestation (A/R), may not request any changes to the start date of the crediting period of the project activity if the start date of the crediting period was prior to the date of registration.

**3.1.4 | Update and/or make permanent changes to registered monitoring plan:**

The project developer is required to request approval and shall:

- a. Describe the nature and extent of the non-conformance to the monitoring plan, as per the applied methodology, in a revised PDD and the proposed alternative monitoring approach for the project activity;
- b. Apply conservative assumptions or discount factors to the calculations in the proposed alternative monitoring to the extent required to ensure that GHG emission reductions or net anthropogenic GHG removals will not be overestimated as a result of the permanent change;
- c. Demonstrate that proposed changes are in line with the requirements of the applied methodology, feasible and implementable within the project design - data management and quality assurance and quality control procedures, are sufficient to ensure that GHG emission reductions achieved by/resulting from the project activity can be reported and verified;
- d. It shall be noted that if the changes to the monitoring plan are not as per the applied methodology, the project developer shall first need to propose a revision to the methodology. The methodology revision shall follow the requirements given in the [Impact Quantification Methodology Approval Procedure](#).

**3.1.5 | Changes to the project design:** The changes to project design may include following, but not limited to:

- a. Increase in the capacity<sup>7</sup> specified in the registered PDD with following conditions:
  - i. If the project activity is large-scale; the project may claim emission reductions and/or other certified impacts:
    - 1) up to an amount calculated based on the increased capacity by 20 per cent of the capacity specified in the originally registered PDDs or
    - 2) full amount calculated based on the increased capacity if the project participants can demonstrate that the reason for the increase is not within the control of the project.
  - ii. If the project activity is small-scale, the project may claim emission reductions and/or other certified impacts for the full amount calculated based on the increased capacity, provided that the resulting project activity does not exceed the small-scale threshold for the corresponding small-scale project type (i.e., 15 MW for Type-I, 180 GWh<sub>th</sub> for Type-II or 60,000 tCO<sub>2</sub>/yr for Type-III).
  - iii. If the project activity is microscale, the project may claim emission reductions and/or other certified impacts for the full amount calculated based on the increased capacity, provided that the resulting project activity does not exceed the microscale threshold (10,000 tCO<sub>2</sub>e/year).
- b. Decrease in the capacity specified in the registered PDD;
- c. Addition of new components OR extension/addition of complimentary technologies/measures involving mass and/or energy transfer to/from the technologies/measures specified in the originally registered PDD;
- d. Removal of a component or technology/measure specified in the registered PDD;
- e. Changes to the technologies/measures that result in the same technologies/measures as originally registered as per the definition of “the same technologies<sup>8</sup>”;
- f. Removal or addition of one or more site(s) of a project activity registered with multiple sites;
- g. Removal of a part component of a certified project activity;

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<sup>7</sup> Installed/rated capacity that directly impacts emission reductions or net anthropogenic removals.

<sup>8</sup> The technology(ies) are considered same if they provide the same kind of output and use the same kind of equipment and conversion process.

- h. Actual operational parameters that are within the control of the project participants, differing from the expected parameters;
- i. Any consequential changes to the application of methodologies, and/or other methodological regulatory documents resulting from the changes referred to in subparagraphs (a.)–(e.) above, including change to or addition of other methodologies, and/or other methodological regulatory documents, or application of a baseline scenario that is more appropriate as a result of the proposed or actual modifications to the project activity;
- j. Voluntary update of the applied methodologies or the other standard documents to a later valid version of them, or voluntary change to other methodologies, provided all requirements in the updated/changed methodologies and the other standard documents are met;
- k. Changes to the project boundary to expand the geographical coverage or to include additional host Parties.

3.1.6 | Changes to PoAs are limited to:

- a. Changes to the programme boundary to expand the geographical coverage or to include additional host Parties;
- b. The following revisions to the eligibility criteria for inclusion of VPAs in the PoA:
  - i. Mandatory revision to the eligibility criteria due to the revision or replacement of the applied methodologies by the Gold Standard Secretariat subsequent to placing them on hold<sup>9</sup>.
  - ii. If a revision to the eligibility criteria is required by the TAC due to an issue related to environmental integrity having been identified.
  - iii. If the use of positive lists or related provisions is introduced or modified.
  - iv. If the geographical boundary of the PoA is expanded within the host Party or to include one or more host Parties.
  - v. If there is an addition or change of technologies/measures with or without addition or change of applied methodologies in the registered PoA-DD as referred in subparagraph (e.) - (g.) below.

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<sup>9</sup> No action is required if the version of the applied methodology is revised without being placed on hold or is withdrawn for the purpose of inclusion in a consolidated methodology, unless otherwise indicated in the respective TAC decision that has approved the new methodology.



- vi. A revision to the eligibility criteria pertaining to the demonstration of additionality
- c. Removal of applied methodologies and/or standardised baselines from the registered PoA-DD;
- d. Changes to the capacity<sup>10</sup> range specified in the registered PoA-DD;
- e. Addition of new components OR extension/addition of complementary technologies/measures involving mass and/or energy transfer to/from the original technologies/measures described in the registered PoA-DD;
- f. Removal of a component or technology/measure described in the registered PoA DD;
- g. Changes to the technologies/measures that result in the same registered technologies/measures as per the definition of “the same technologies”<sup>11</sup>;
- h. Any consequential changes to the application of methodologies, standardised baselines and/or the other methodological regulatory documents resulting from the changes referred to in subparagraphs (a.) – (g.) above, including change to or addition of other methodologies, other standardised baselines and/or other methodological regulatory documents, or application of a baseline scenario that is more appropriate as a result of the proposed or actual modifications to the PoA;
- i. Voluntary update to the latest valid versions of the applied methodologies or the other standard documents, or voluntary change to other methodologies, provided that all requirements in the updated/changed methodologies or the other methodological regulatory documents are met.

3.1.7 | The allowed changes to the design of an included VPA along with the conditions are as given in Section 3.1.5 | for projects. It should be noted that some changes to a VPA may require the changes to be reflected in the PoA first.

## 4| DESIGN CHANGE DOCUMENT PREPERATION

The revised documentation shall include an assessment of the impacts of the design changes on the following aspects:

- a. Additionality of the project activity

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<sup>10</sup> Installed/rated capacity that directly impacts emission reductions or net anthropogenic removals

<sup>11</sup> The technology(ies) are considered same if they provide the same kind of output and use the same kind of equipment and conversion process.

- b. Applicability of the methodology and other methodological regulatory documents with which the project activity has been certified
- c. Compliance with the monitoring plan and the applied methodology
- d. Level of accuracy and completeness in the monitoring of the project activity compared with the requirements contained in the registered monitoring plan
- e. Scale of the project activity
- f. Stakeholder consultation
- g. Sustainable development criteria
- h. Safeguarding assessment
- i. Legislation

## 4.1 | ADDITIONALITY

4.1.1 | The project developer must discuss the effect of design changes on the validity of the demonstration of additionality and provide all required justifications, as applicable:

- a. If the proposed or actual changes affect the additionality of the certified project activity, PoA or VPAs as referred to in Section 3 above, the demonstration of the impacts of the changes on the additionality shall be based on all original input data. In addition<sup>12</sup>:
  - i. if investment analysis was used, the project participants shall only modify the key parameters in the original spreadsheet calculations affected by the proposed or actual changes to the project activity, PoA or VPA;
  - ii. if only barriers were claimed to demonstrate additionality, the project participants shall demonstrate that the barriers are still valid under the new circumstances.
- b. 4.1.1 | aaboveIf a certified project activity, PoA or VPAs applies an approved methodology that standardises additionality, and if the proposed or actual changes affect the additionality of the certified project activity, the demonstration of the impacts of the changes on the additionality shall be based on the additionality criteria (e.g. positive lists of technologies) identified in the applied methodology or applicable tool.

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<sup>12</sup> If a proposed or actual modification adversely impacts the additionality of the project activity, subsequent requests for issuance of emission reductions based on such modifications will be rejected.

- c. Changes may impact the validity of investment analysis or barrier analysis established at the time of project Design Certification, thus affecting the additionality of the project. This would typically be the case when:
  - i. changes affect the output capacity due to an increased installed capacity or an increased number of units, or installation of units with lower capacity or units with a technology which is less advanced than that described in the project documentation;
  - ii. components are added or the ones considered are extended;
  - iii. sites are removed or added in the context of a project certified with multiple sites;
  - iv. actual operational parameters within the control of the project developer are associated with different values than previously expected, affecting the determination of the emission reductions and the investment analysis.

## 4.2 | APPLICABILITY OF METHODOLOGY

- 4.2.1 | When a Project has not been implemented as described in the registered project documentation, the applicability and application of the baseline methodology with which the Project has been certified shall be re-assessed.
- 4.2.2 | The project developer shall discuss whether the original methodology is still applicable, or whether another methodology shall be used. The same analysis shall also be conducted with respect to the selected baseline scenario as given in the applied methodology.
- 4.2.3 | Where the project developer cannot demonstrate compliance with the requirements of the applied methodologies, or the other standard documents with which the project activity has been certified, the project participants shall:
  - a. Revise the PDD by applying:
    - i. a later valid version of the applied methodologies, or other standard documents; or
    - ii. other methodologies, or other methodological regulatory documents that are applicable to the project activity; and
  - b. Demonstrate compliance with the requirements of the newly applied methodologies, the newly applied standardised baselines, and the other standard documents in the revised PDD.

## 4.3 | PROJECT SCALE

- 4.3.1 | Project developers shall discuss to what extent the design changes affect the scale of the project as per Gold Standard Requirements. If the upper threshold for the project scale, defined as per applicable Activity or Product

requirement is exceeded, related requirements are no longer applicable to the Project and project developer shall revise the project documentation accordingly.

#### **4.4 | STAKEHOLDER FEEDBACK ON DESIGN CHANGE**

- 4.4.1 | The project developer shall discuss if there is a need to conduct a stakeholder consultation on changes that are to occur or have occurred in the Project design.
- 4.4.2 | Whenever design changes include the extension of the Project boundaries to new sites or the selection of different sites from those that had been envisioned at the time of previous Stakeholder Consultations, relevant stakeholders from these locations shall be invited for comments as per [Stakeholder Consultation and Engagement requirements](#). For example, design changes in wind power projects increasing their capacities to new locations or modifying the microsite plan of wind turbines involving different locations compared to the one envisioned at the time of Design Certification may call for a physical meeting to include the feedback of stakeholders who were not included in the earlier stakeholder meetings.
- 4.4.3 | The project developer can choose to invite comments electronically or through a physical meeting and shall justify the selected method. To the extent possible, the project developer shall conduct the complementary stakeholder consultation on design change component prior to the start of implementation of change in the project design.

#### **4.5 | SUSTAINABLE DEVELOPMENT CRITERIA AND SAFEGUARDING ASSESSMENT**

- 4.5.1 | The project developer shall discuss any necessary revision in the SDG Impact and [Safeguarding Principles](#) assessment following the design changes.
- 4.5.2 | Changes in the project location or the extension of the project boundaries call for a re-assessment of the SDG Impacts and [Safeguarding Principles](#), as does a significant change of scale of the project, even if located on the same site. If a new Environmental Impact Assessment (EIA) is required as per the local legislation, the SDG Impact and [Safeguarding Principles](#) assessment shall take into account the new elements provided, including potential new mitigation and/or compensation measures to put in place.

#### **4.6 | MONITORING & REPORTING PLAN**

- 4.6.1 | The project developer shall discuss whether there is a need to make any change in the registered monitoring plan to accommodate any changes due to local stakeholders' feedback, applicability of methodology, SDG Impact, Safeguarding assessment and any other applicable requirements.

4.6.2 | The project developer shall revise the monitoring plan to include new mitigation measures as per a revised EIA or new comments by stakeholders.

## 4.7 | LEGISLATION

4.7.1 | The project developer shall also discuss the need for any new approvals/licenses from the environmental and/or regulatory agencies.

## 5 | VALIDATION REQUIREMENTS FOR VVBs

### 5.1 | PERMANENT CHANGES

5.1.1 | **Corrections:** The VVB shall determine:

- a. whether any corrections to project information or parameters fixed at validation, as described in the registered PDD, comply with the relevant requirements stated in Section 4, above;
- b. if the project participants have made corrections, whether the corrected information is an accurate reflection of actual project information; and/or the corrected parameters are in accordance with applicable standard documents i.e., methodology or applicable requirements.

5.1.2 | The VVB shall state how the corrected information accurately reflects the actual project information and/or how the corrected parameters reflect the application of the applied methodologies, the registered monitoring plan, the applied standardised baseline and the other standard documents.

5.1.3 | **Changes to the start date of the crediting period:** The VVB shall determine and state its opinion on whether the proposed change in start date of crediting period complies with the relevant requirements stated in paragraph 3.1.3 | above.

5.1.4 | **Update and/or permanent changes to registered monitoring plan:** The VVB shall determine:

- a. whether there are permanent changes to the registered monitoring plan, or whether the monitoring permanently deviates from the applied methodologies (hence requiring revision of the methodology). If there are, determine whether the permanent changes or deviation comply with the relevant requirements;
- b. whether the permanent changes are in compliance with the applied methodologies and do not reduce the level of accuracy of the monitoring compared with the requirements contained in the registered monitoring plan;
- c. whether the permanent changes or the permanent deviation of the monitoring from the applied methodologies are likely to lead to a reduction in the accuracy of the calculation of GHG emission reductions or net anthropogenic GHG removals. If the permanent changes or the permanent

deviation will lead to a reduction in the accuracy of the calculation, the VVB shall request the project developer to 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 over-estimated as a result of the permanent change or the permanent deviation.

5.1.5 | The VVB shall state its opinion on whether the permanent changes or the permanent deviation comply with the relevant requirements stated in paragraph 3.1.4 | aboveabove.

5.1.6 | **Changes to the project design:** The VVB shall determine:

- a. whether there are proposed or actual changes to the project design of a certified project activity, and, if there are, determine whether the changes comply with the relevant requirements;
- b. whether the description of changes in revised PDD accurately reflects the implementation, operation and monitoring of the modified project activity by review of the submitted revised PDD and by means of an on-site inspection (where conducted as per the GS4GG requirements);
- c. the impacts of the actual changes on the monitoring plan, the level of accuracy of the monitoring activity, the applied methodologies and other requirements, as applicable;
- d. whether the proposed or actual changes would adversely affect the conclusions of the validation report of the registered PDD with regard to:
  - i. Additionality of the project activity, applicability of the methodology and applicable requirement documents with which the project activity has been certified,
  - ii. Compliance with the monitoring plan with applied methodology,
  - iii. Level of accuracy and completeness in the monitoring of the project activity compared with the requirements contained in the registered monitoring plan,
  - iv. Scale of the project activity,
  - v. Stakeholder consultation,
  - vi. Sustainable development criteria,
  - vii. Safeguarding assessment, and
  - viii. Compliance with applicable legislation

5.1.7 | If the proposed or actual changes affect the additionality of the certified project activity, the VVB shall confirm that:

- a. if investment analysis was used to demonstrate additionality, the project participants have only modified the key parameters in the original

spreadsheet calculations affected by the proposed or actual changes to the project activity;

- b. if only barriers were claimed to demonstrate additionality, the project participants have demonstrated that the barriers are still valid under the new circumstances;
- c. if the certified project activity uses an approved positive list or standardised additionality and the proposed or actual changes affect the additionality of the project activity, the VVB shall confirm that the project activity complies with the positive list of the applied standardised baseline in the registered PDD.

5.1.8 | The VVB shall assess:

- a. whether the revised PDD complies with all the requirements of the applied methodologies, and the other standard documents;
- b. if the applied methodologies and/or standardised baselines have been updated to the latest valid version, or changed to other methodologies or standardised baselines, the VVB shall confirm that the revised PDD meets all requirements of the updated/changed methodologies, including the standards, methodological tools and guidelines applied in accordance with the updated/changed methodologies, and/or the updated/changed standardised baselines.

5.1.9 | The VVB shall state its opinion on:

- a. a description of the proposed or actual changes as compared to the description in the registered PDD;
- b. an assessment on when the changes occurred, reasons for these changes taking place, whether the changes would have been known prior to the registration of the project activity, how the changes would impact on the overall operation/ability of the project activity to deliver emission reductions or net anthropogenic removals as stated in the PDD, and whether the revised estimation of emission reductions due to the change takes into account the applicable limits in accordance with GS4GG requirements;
- c. an assessment regarding whether the changes would adversely affect the conclusions of the validation report of the registered PDD with regard to:
  - i. The applicability and application of:
    - 1) the applied methodologies, the applied standardised baselines and the other standard documents with which the project activity has been certified;
    - 2) the latest valid version of the applied methodologies, the applied standardised baselines and/or the other standard documents;
    - 3) other methodologies and/or standardised baselines that the certified project activity has updated/changed to;

- ii. The project boundary and any associated leakages due to the changes;
- iii. The compliance of the monitoring plan with the applied methodologies, the applied standardised baselines and the other standard documents;
- iv. The level of accuracy of the monitoring compared with the requirements contained in the registered monitoring plan;
- v. The additionality of the certified project activity;
- vi. The scale of the certified project activity.

5.1.10 | In validating the revised PDD containing the proposed or actual changes, and in preparing the opinion, the VVB shall include information on how:

- a. the proposed revisions ensure that the level of accuracy and completeness<sup>13</sup> in the monitoring and verification process is not reduced as a result of the revision. The VVB shall, using objective evidence, assess the accuracy and completeness of each proposed revision to the registered monitoring plan, including the frequency of measurements, the quality of monitoring equipment (e.g., calibration requirements, the quality assurance and quality control procedures);
- b. the proposed revisions comply with all requirements of:
  - i. the applied methodologies, the applied standardised baselines and the other standard documents;
  - ii. the updated/changed methodologies including the standards, methodological tools and guidelines applied in accordance with the updated/changed methodologies, and/or the updated/changed standardised baselines if updated to a later valid version or changed to other methodologies or standardised baselines;
- c. The findings of previous verification and certification reports, if any, have been taken into account.

5.1.11 | In the case of permanent changes to a PoA/VPA, the VVB shall follow the requirements stated in the above sections, however, the VVB shall be required to assess the impact of these changes on both the PoA and the VPA(s).

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<sup>13</sup> Completeness refers to inclusion of all relevant information for assessment of GHG emissions reductions and the information supporting the methods applied as required. For example, if the VVB identifies an on-site generator for emergency use which was not included in the registered monitoring plan during the verification process, the monitoring of fuel consumption of this generator should be included in the monitoring plan via this procedure.



## 6| DESIGN CHANGE APPROVAL PROCEDURE

- 6.1.1 | Permanent changes can be identified by project developer, VVB, the Gold Standard Secretariat or can be mandated due to methodology/rule update (in case of PoA), at any stage of the project cycle - during the course of a given monitoring period, validation/verification, design/performance certification review.
- 6.1.2 | For changes that require the Secretariat’s approval, the project developer may choose to submit a request for approval of design change, following any of the below approval tracks and applicable requirements for VVB opinion.

Table 2

Approval Track	Procedure	VVB requirement
Prior notification track	Submit the request for the design change approval before proceeding with a request for performance certification.	VVB to assess whether the proposed or actual changes comply with the relevant requirements and provide opinion or make a decision internally.  Request for approval can be submitted any time prior to the submission of the request for issuance of emission reductions.
Issuance track	Submit the request for the design change with verification/ performance certification	VVB contracted to perform verification for the next request for issuance of VERs shall also assess whether the proposed or actual changes comply with the relevant requirements.

- 6.1.3 | Design Change requests submitted under issuance track shall be reviewed in tandem with the request for performance certification. In doing so, the project developer may take into account the indicative list of types of changes that may be suitable for approval with issuance request, given in section 8| below. The project developer shall consider potential implications/risk of non-approval of design change request. Rejection of the request prevents any issuance unless the previous design is recovered or an alternative, acceptable design change is submitted.
- 6.1.4 | The project developer shall submit request for approval of a design change with VVB opinion to SustainCERT. A complete design change memo with revised project documents, shall be submitted as per paragraph 2.1.4 | above.
- 6.1.5 | For microscale projects, microscale PoA/VPAs, the project developer may submit the design change request to SustainCERT under prior notification or issuance track. SustainCERT shall review the design change request and

assess whether validation of the design changes shall be performed by VVB or by SustainCERT internally. If validation of changes by VVB is requested by SustainCERT, the project developer shall request a VVB to validate whether proposed design change comply with the relevant requirements and provide opinion.

- 6.1.6 | When the design changes are identified as part of the certification review, SustainCERT may review and make decision during the certification review or ask project developer to submit a design change request separately.
- 6.1.7 | Upon receipt of the request for design change approval, SustainCERT conducts a 'completeness' check to confirm whether all the necessary information and documentation have been submitted.
- 6.1.8 | Approval or rejection of the design change request may occur directly after submission of the necessary documentation or after rounds of review.
- 6.1.9 | Rejection of the request prevents any issuance unless the previous design is recovered or an alternative, acceptable design change is submitted.
- 6.1.10 | Approval of the request allows the revised Project Documentation to be applicable for all future issuances. The revised Project Documentation and the design change memo are uploaded to the [Impact Registry](#) accordingly.

## 7| APPLICABLE FEE

- 7.1.1 | Refer to [fee schedule](#) for applicable fee.

## 8| INDICATIVE LIST OF DESIGN CHANGES THAT CAN BE SUBMITTED WITH ISSUANCE TRACK

- 8.1.1 | Request for approval of a design change may be suitable to be submitted under the issuance track:
  - a. Any corrections to project information<sup>14</sup> of a certified project activity that do not affect the design of the project activity;
  - b. Changes to the monitoring of a certified project activity that have no material impact<sup>15</sup> on the applicability of the applied methodologies, other standard documents, or the accuracy and completeness of the monitoring;

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<sup>14</sup> Such corrections may include typographical errors, location, names and numbers of components, etc.

<sup>15</sup> The materiality thresholds for verification contained in the "[CDM validation and verification standard](#)" for project and/or PoA should be followed, unless more conservative threshold is provided in the applied methodology(ies).

- c. Changes to the project design of a certified project activity that do not adversely impact any of the following:
  - i. The applicability and application of the applied methodologies and the other standard documents with which the project activity has been certified;
  - ii. The additionality of the project activity;
  - iii. The scale of the project activity;
  - iv. Safeguarding and sustainable development impact
- d. Changes to the project design to use the positive list for demonstrating additionality.