



Gold Standard[®]
for the Global Goals

OPTIONAL REQUIREMENT

DESIGN CHANGE REQUIREMENTS

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CONTACT DETAILS

The Gold Standard Foundation
International Environment House 2
Chemin de Balexert 7-9
1219 Châtelaine
Geneva, Switzerland
Tel: +41 22 788 70 80
Email: standards@goldstandard.org

SUMMARY

This document provides the requirements and approval procedures for project developers and Coordinating/Management Entities (CMEs) seeking permanent changes to the implementation, operation and/or monitoring of a certified project activity/PoA/VPA.

Project developers seeking temporary 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 refer to the [Deviation Approval Requirements and Procedures](#).

Note: The design change requirement is also included as Annex-A (Design Change Approval Procedure) of the [Gold Standard Principles and Requirements](#) (version 1.2 published October 2019). This document clarifies permanent changes allowed under GS4GG and outlines circumstances requiring Design Change approval from the Gold Standard. This document takes precedence over any inconsistency between the two.

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1| SCOPE AND APPLICABILITY

- 1.1.1 | This document outlines requirements and procedures to seek approval for permanent changes - proposed or actual - to implementation, operation or monitoring of a design certified project activity. The project activity refers to standalone project activity, Programme of Activities (PoA) or included VPAs, unless stated otherwise.
- 1.1.2 | The design change request for a certified project shall be submitted to Certification body.¹
- 1.1.3 | Project developers seeking **temporary change** from design certified monitoring plan² or an **interim deviation** from Gold Standard for the Global Goals (GS4GG) requirements and Methodologies or applicable methodologies for activities prior to project submission for certification with GS4GG, shall follow the [Deviation Approval Requirements and 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 or design change to be submitted. Clarifications can be submitted to SustainCERT using the [Clarification Request Form](#) and sending it at help@sustaincert.com with the email subject line - 'Clarification Request'.

2| GENERAL REQUIREMENTS

- 2.1.1 | For any change regarding the cover letter, project ownership, change of coordinating/managing entity (CME) and others after the request for design certification, the project developer/CME shall submit the applicable revised document(s) signed by all entities involved, to the certification body.
- 2.1.2 | The project developer and/or CME shall identify and document any actual or proposed changes³ to the implementation, operation or monitoring of the certified project activity, Programme of Activities (PoA) or included VPAs.

¹ If a certified project includes a new technology or measure, it shall submit a request for approval of the design change to the certification body within one year of the proposed technology or measure's start date. Failure to do so will render the design change component ineligible for Gold Standard certification. The prior consideration rule also applies to projects that undergo a design change.

² The monitoring plan outlined in PDD at the time of project design certification.

³ 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

- 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.
- 2.1.4 | If there is any actual or proposed change(s) 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. Revised PDD, PoA-DD or VPA-DD (in both track-change and clean versions) that reflects the actual or proposed changes;
 - b. Revised SDG Impact Tool; if required
 - 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 constitute permanent changes as defined in paragraph [3.1](#) | below.
- 2.1.6 | Unless otherwise stated in the provisions below, the design changes request requires positive validation opinion from VVB prior to submission to the certification body.

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. Refer to Paragraph 4.1.49(c), [Principles and requirements](#).

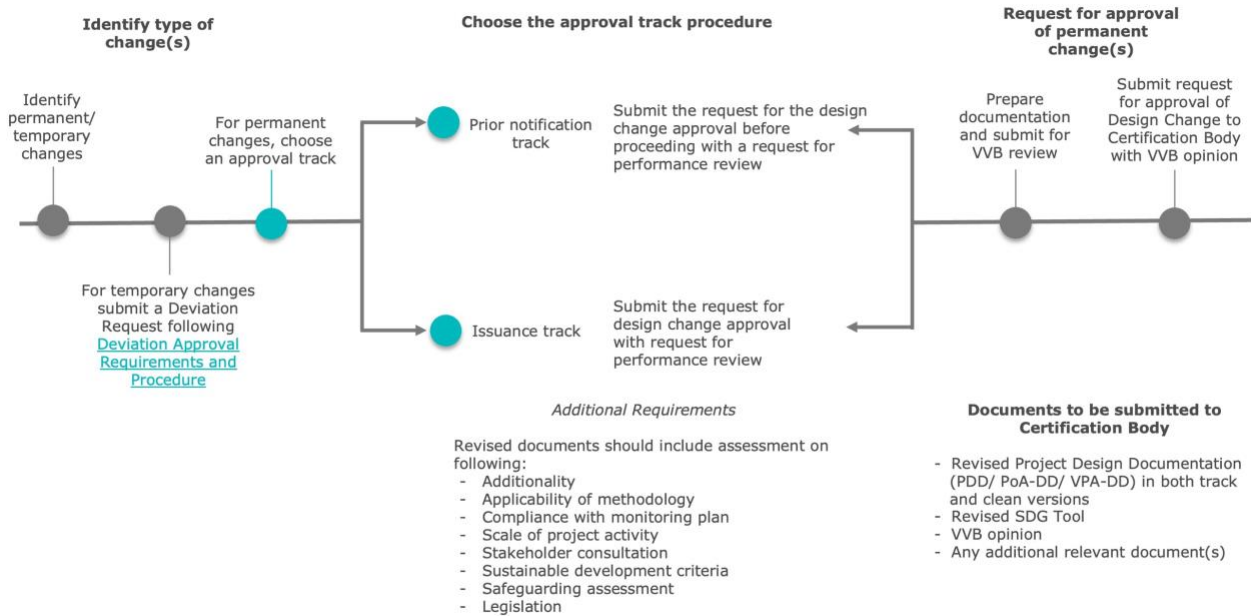


Figure- 1 A diagrammatic representation of the steps involved in Submission of Design Change Request

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 design certified monitoring plan, scale of the project⁴, safeguarding assessment, stakeholder consultation, sustainable development impact, applicable legal requirements etc.

3.2 | Corrections

3.2.1 | Involve changes in the project information that affect the design of the project, for example - project information or ex-ante parameters information⁵ at design certification of the project activity as described in the design

⁴ The scale of the project is not only defined by the maximum power generation capacity for power projects (type I projects) and maximum threshold of energy savings for energy efficiency project (type II projects), but also may refer to the volume of emission reductions from a project (type III projects or GS microscale project).

⁵ This provision does not allow the parameter values fixed ex ante at the time of the design certification of the project activity to be updated, as it is not regarded as a correction.

certified PDD. The project developer shall make corrections in a revised PDD. VVB shall provide opinion on such changes in the validation/verification report as applicable.

3.3 | Changes to the start date of the crediting period

3.3.1 | The following changes to the start date of the design certified crediting period may be requested:

- a. Bringing forward the crediting period start date up to one year earlier than that indicated in the design certified PDD, taking into account that the start date shall not be earlier than two years⁶ from date of design certification and/or start date of the project, whichever occurs later;
- b. In case the revised 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 1 below, but shall notify VVB at the time next certification event, as applicable
- c. In case the revised start date of the crediting period is before the date of Project Design Certification, a certified project activity is required to request approval for the changes summarised in the Table 1 below;
- d. A design certified 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 if the existing start date of the crediting period was prior to the date of design certification.

Table 1 – Requirements for change from design certified crediting period start date

CHANGES IN CREDITING PERIOD START DATE	PROJECT LOCATION	REQUIREMENTS
Up to one year	All locations	No Justification and/or approval is required
Between 1-2 year	All locations	Prior to or at the time of first verification, the project shall:

⁶ In case of A/R and Agriculture Projects it is maximum three years prior to Project Design Certification.

Between 2-4 years	LDC, LLDC and SIDC	<ul style="list-style-type: none"> 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. ii. Demonstrate that substantive progress has been made by the project developer to start the project activity.
Between 2-4 years	Host country other than LDC, LLDC and SIDC	<p>Prior to or at the time of first verification, the project shall:</p> <ul style="list-style-type: none"> i. Demonstrate that the project activity remains additional. ii. Demonstrate that the original baseline scenario established in the design certified PDD remains valid, or update the baseline scenario using the latest data, as appropriate. iii. If the methodology version has been updated, the defaults values for e.g., emission factors etc. shall be updated in line with the recent methodology versions. iv. Demonstrate that substantive progress has been made by the project developer to start the project activity.
>4 years	Host country other than LDC, LLDC and SIDC	The revision to crediting period start date is not permitted
>4 years	LDC, LLDC and SIDC	<p>Prior to or at the time of first verification, the project shall:</p> <ul style="list-style-type: none"> i. Demonstrate that the project activity remains additional. ii. Demonstrate that the original baseline scenario established in the design certified 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 versions. iv. Demonstrate that substantive progress has been made by the project developer to start the project activity.

3.4 | Update and/or permanent changes to design certified monitoring plan:

3.4.1 | The project developer shall:

- a. Describe the nature and extent of the non-conformance to the certified monitoring plan, as per the applied methodology, in a revised

PDD/PoA/VPA DD and the proposed alternative monitoring approach for the project activity;

- b. apply conservative assumptions or discount factors to the proposed alternative monitoring calculations as necessary to avoid overestimating GHG emission reductions or net anthropogenic GHG removals and SDG Impact resulting from 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. These procedures are sufficient to ensure that GHG emission reductions achieved by or resulting from the project activity can be reported and verified.;
- d. first propose a revision to the methodology, if proposed changes to the monitoring plan are not in line with the applied methodology. The methodology revision shall follow the requirements given in the [Impact Quantification Methodology Approval Procedure](#).

3.5 | Changes to the project design

3.5.1 | The changes to project design may include following, but not limited to:

- a. Increase in the capacity⁷ specified in the design certified 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 design certified PDDs, or
 2. full amount calculated based on the increased capacity if the project developer can demonstrate that the reason for the increase is not within the control of the project developer.
 - 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_{th} for Type-II or 60,000 tCO₂/yr for Type-III).

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

- 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 tCO₂e/year and/or other threshold as per applied activity requirements).
- b. Decrease in the capacity specified in the design certified PDD;
- c. Addition of new components OR extension/addition of complementary technologies/measures involving mass and/or energy transfer to/from the technologies/measures specified in the originally design certified PDD;
- d. Removal of a component or technology/measure specified in the design certified PDD;
- e. Changes to the technologies/measures that result in the same technologies/measures as originally design certified as per the definition of "the same technologies"⁸;
- f. Removal or addition of one or more site(s) of a project activity design certified with multiple sites;
- g. Removal of a component/part of component of a design certified project activity;
- h. Actual operational parameters that are within the control of the project developer, 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.

⁸ The technology(ies) is considered same if they provide the same kind of output and use the same kind of equipment and conversion process.

3.6 | Changes to PoAs and/or VPA

3.6.1 | The changes to PoAs and/or VPA 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 real case VPAs in the PoA or regular VPAs in a real case VPAs:
 - 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 hold⁹.
 - 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 design certified PoA-DD and/or real case VPA-DD as referred in subparagraph (e.) - (g.) below.
 - vi. A revision to the eligibility criteria pertaining to the demonstration of additionality.
- c. Removal of applied methodologies and/or standardised baselines from the design certified PoA-DD and/or real case VPA-DD;
- d. Changes to the capacity¹⁰ range specified in the design certified PoA-DD and/or real case VPA-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 design certified PoA-DD and/or real case VPA-DD;
- f. Removal of a component or technology/measure described in the design certified PoA DD and/or real case VPA-DD;

⁹ 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.

¹⁰ Installed/rated capacity that directly impacts emission reductions or net anthropogenic removals.

- g. Changes to the technologies/measures that result in the same design certified technologies/measures as per the definition of “the same technologies”¹¹;
- 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 and/or real case VPA-DD;
- 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.

3.6.2 | The allowed changes to the design of an included VPA along with the conditions are as given in paragraph 3.6.1 | for projects. It should be noted that some changes to a real case VPA may require the changes to be reflected in the PoA first or changes to a regular VPA may require changes in real case VPA or PoA as appropriate.

4 | DOCUMENTATION REQUIREMENTS

4.1 | Scope of revised documentation

- 4.1.1 | The revised documentation shall include an assessment of the impacts of the design changes on the following aspects:
- a. Additionality of the project activity,
 - 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 design certified monitoring plan,
 - e. Scale of the project activity,
 - f. Stakeholder consultation,
 - g. Sustainable development criteria,

¹¹ The technology(ies) is considered same if they provide the same kind of output and use the same kind of equipment and conversion process.

- h. Safeguarding assessment,
- i. Legislation.

4.2 | Additionality

4.2.1 | The project developer shall 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 addition¹²:
 - i. if investment analysis was used, the project developer 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 developer shall demonstrate that the barriers are still valid under the new circumstances.
- b. 4.2.1 | above If 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.
- 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;

¹² 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.

- iii. site(s) is/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.

4.3 | Applicability of methodology and compliance with the monitoring plan

- 4.3.1 | When a project has not been implemented as described in the design certified project documentation, the applicability and application of the baseline methodology with which the project has been certified shall be re-assessed.
- 4.3.2 | 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.
- 4.3.3 | 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 developer shall:
 - a. Revise the PDD by applying:
 - i. the 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.

4.4 | Project scale

- 4.4.1 | Project Developers shall discuss the extent to which design changes affect the project's scale according to GS4GG requirements. If the upper threshold for the project's scale, defined as per applicable [Activity](#) or [Product Requirements](#), is exceeded, then the related requirements are no longer apply to the project. The project developer shall then revise the project documentation accordingly.

4.5 | Stakeholder feedback on design change

- 4.5.1 | The project developer shall determine whether a stakeholder consultation is necessary for changes to the project design. This process involves assessing the potential impact of changes on stakeholders and determining whether their input is necessary to ensure that the project design remains aligned with their needs and expectations. If deemed necessary, the project developer shall conduct a stakeholder consultation on changes to occur or that have

occurred in the project design. For example, changes to wind power projects, such as increasing capacities in new locations or modifying the microsite plan of wind turbines to different locations than those originally planned during design certification, may require a physical meeting. This meeting shall include feedback from stakeholders who were not included in earlier stakeholder meetings.

- 4.5.2 | If design changes require extending to new sites or selecting different sites from those originally envisioned during stakeholder consultations, the project developer shall invite relevant stakeholders from these locations to provide input on the changes in accordance with the [Stakeholder Consultation and Engagement Requirements](#). The project developer should conduct the stakeholder consultation on design changes before implementing any changes to the project design, and may choose to solicit comments electronically or through a physical meeting.

4.6 | Sustainable development and safeguarding assessment

- 4.6.1 | The project developer shall assess any necessary revisions in the SDG Impact and [Safeguarding Principles](#) assessment following the design changes, and incorporate those changes.
- 4.6.2 | Changes in the project location or the extension of project boundaries require re-assessment of the SDG Impacts and [Safeguarding Principles](#). The same applies to significant change in project scale, 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 consider new elements provided, including potential new mitigation and/or compensation measures to implement.

4.7 | Monitoring & reporting plan

- 4.7.1 | The project developer shall discuss the need to make any change to design certified monitoring plan with regard to local stakeholders' feedback, applicability of methodology, SDG Impact, safeguarding assessment and any other applicable requirements.
- 4.7.2 | The project developer shall revise the monitoring plan to include new mitigation measures as per a revised EIA or new comments from stakeholders.

4.8 | Legislation

- 4.8.1 | The project developer shall also document any new approvals/licenses required or obtained from the environmental and/or regulatory agencies.

5 | REQUIREMENTS FOR VVBS

- 5.1.1 | For VVB requirements, please refer to [Validation and Verification Standard](#), section 8 for standalone project activity and section 15 for PoA and VPAs.

6| DESIGN CHANGE APPROVAL PROCEDURE

- 6.1.1 | Permanent changes can be identified by project developer, VVB, certification body, 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 | 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

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. The microscale project will follow the requirement in paragraph 6.1.5 .

- 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 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 certification body.
- 6.1.5 | For microscale projects, microscale PoA/VPAs, the project developer may submit the Design Change request to certification body under prior notification or issuance track. For issuance track, the certification body shall review the Design Change request and assess whether validation of the design changes shall be performed by VVB or by the certification body internally. If validation of changes by VVB is requested by the certification

body 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, the certification body 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, certification body 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 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 information¹³ 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 impact¹⁴ on the applicability of the applied methodologies, other standard documents, or the accuracy and completeness of the monitoring;
 - c. Changes to the project design of a certified project activity that do not adversely impact any of the following:

¹³ Such corrections may include typographical errors, location, names and numbers of components, etc.

¹⁴ The materiality thresholds for verification contained in the "[GS4GG validation and verification standard](#)" for project and/or PoA should be followed, unless more conservative threshold is provided in the applied methodology(ies).

- 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.

DOCUMENT HISTORY

Version	Date	Description
1.1	14.04.2023	Editorial changes Removed references to design change memo
1.0	14.01.2021	Formally included as Annex-A (Design Change Approval Procedure) of the Gold Standard Principles and Requirements (version 1.2 published October 2019)