

FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: 12/11/2024

VERSION: 6.0

NEXT PLANNED UPDATE: 12/11/2026

RELATED DOCUMENTS

– [Deviations Approval Requirements and Procedures](#)

CONTACT DETAILS

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

1| General Guidelines

1.1 | Applicability

- 1.1.1 | This form is to be completed for projects (project activities/PoAs/VPAs) seeking deviation or is/are at a risk of deviating from any [applicable requirements](#), GS4GG-specific requirements listed in the applicable [Methodologies](#) or any other deviations occurring in any of the various aspects of the project.
- 1.1.2 | Refer to the latest version of [Deviation Request Requirements and Procedures](#) for detailed information on the procedures and requirements.
- 1.1.3 | This form can be used in the following instances i.e.,
 - a. Deviation from GS4GG requirements and/or applicable methodologies prior to submission for certification with GS4GG.
 - b. 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.
- 1.1.4 | For any permanent changes to a design certified project, the requirements set in [Design Change Approval Requirements and Procedures](#) shall be followed.

2| Submission of deviation form

- 2.1.1 | This form shall be submitted in Microsoft Word (.doc) format to Gold Standard at deviations@goldstandard.org
- 2.1.2 | Forms with incomplete/inaccurate information shall not be considered for review and shall be returned to the applicant.

3| Implementation of deviation decision

- 3.1.1 | The decision prescribed in this form shall be considered by the entity applying for deviation for further course of action.

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4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-173
Date of decision	22/09/2025
Decision	☐ Approved [No precondition to apply the deviation decision] ☐ Conditionally approved [Decision is subject to compliance with the precondition defined below] ☒ Not approved [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

The deviation request is not approved as the project is not eligible. The CME must follow the requirements from paragraph 4.1.49 Principles and Requirements V2.1.

4.2.2 | Directions for the project developer/CME, if applicable

NA

4.2.3 | Directions for the Validation and Verification Body (VVB), if applicable

NA

4.2.4 | Directions for the Gold Standard, if applicable

NA

4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances? ¹	☐ Yes ☒ No
Does this decision set a precedent for future projects with similar circumstances? ²	☐ Yes ☒ No
Precedent details (if applicable to other activities)	
NA	

¹ If this is marked yes, this means that any other project (PoA/VPA/PA) in similar situation may apply the decision of this deviation to their project as well. The project developer/VVB may quote this deviation decision in the relevant certification documents. This is relevant to only the projects which have already entered the certification cycle with GS4GG.

² If this is marked yes, it means the decision is valid to all the future projects which will enter the certification cycle with the similar situation. This is relevant to all the projects which are not yet design certified with GS4GG or have not submitted their documents for preliminary review yet.

5| Deviation Request Details

To be completed by the entity requesting deviation - (Project Developer/Coordinating and Managing Entity and/or VVB)

5.1 | Submitted by

- ☒ Project developer
☐ CME
☐ VVB
☐ Other (Consultants to Project Developer)

5.2 | Details of the entity and its representative submitting the form

Item	Information
Name ³ :	Christopher Murillo
Email ID ⁴ :	christopher.murillo@circularep.gob.ec
Organisation: ⁵ :	Circular EP
Are you an authorized project participant as per the cover letter submitted for this activity?	☒ Yes ☐ No

5.3 | Background information

Type	☒ Project activity	☐ PoA GSXXXX	☐ VPA
GS ID	GSXXXX GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Ecuador		
Project Title	"Proyecto de captura y aprovechamiento del biogás generado en el Complejo Ambiental Las Iguanas" (Biogas Capture and Utilization Project at the Las Iguanas Environmental Complex)		
Registry link	N/A (Deviation prior to submission certification with GS4GG)		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding	☐ Listed	☐ Certified design	☐ Certified project ☐ Other

³ Name of the individual representing the entity requesting the deviation

⁴ Email ID for further correspondence related to the deviation request

⁵ The name of the entity requesting the deviation

date of latest status				<i>If other, specify here</i>
	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy
Applied version of Standard	☒ GS4GG ☐ Previous version of Gold Standard			
	Version no.			
	☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
Transition date, if applicable	From previous GS version to GS4GG		dd/mm/yyyy	
	From another standard to GS4GG		dd/mm/yyyy	
	Name of another standard	☐ CDM ☐ Other Name of the Standard – Insert text here		
Applicable activity requirement	☒ Renewable Energy Activity Requirements ☐ Community Services Activity Requirements ☐ Land-use and Forests Activity Requirements ☐ Other Insert name here			

5.4 | Project deviation history

Is there any deviation request(s) for the same project activity/PoA/VPA(s) that was submitted to GS previously? If yes, below information.			☐ Yes ☒ No
Reference number	N/A		
Status of the deviation	☐ Approved	☐ Rejected	☐ Under review
Were there any findings (CL, CAR, FAR) raised during any certification step (preliminary review, design and/or performance review etc.) that are relevant to this deviation request?	☐ Yes ☐ No Summary of the findings Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number		

6 | Deviation detail

To be completed by the entity requesting deviation (Project Developer/Coordinating and Managing Entity and/or VVB)

6.1 | Standard document reference

Standard document reference	Title	1. Principles and Requirements 2. GHG Emissions Reduction & Sequestration Product Requirements
	Version	1. Version 2.1 2. Version 3.1

	Paragraph	1. Paragraph 4.1.49.b) Regular or Retroactive 2. Paragraph 10.2.1 The start date of Crediting Period
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6.2 | Description of the deviation

Title	Deviation from retroactivity limits due to unconventional circumstances at the Las Iguanas Landfill	
Confirm the nature of changes related to deviation	☐ Temporary (e.g. not expected to occur beyond one monitoring period)	☒ Permanent (e.g. deviation from requirements prior to submission for certification)
	The requested deviation for project activity involves unconventional circumstances or unique conditions such that previous approval is required prior to request for certification.	
Relevant monitoring period, if applicable	Start date	N/A
	End date	N/A
Summarise the changes	"Biogas Capture and Utilization Project at the Las Iguanas Environmental Complex" involves the installation and operation of a biogas capture system for future electricity generation at the Las Iguanas landfill, managed by the public company CIRCULAR EP in Guayaquil, Ecuador. On December 12, 2019, the Municipality of Guayaquil and the Development Bank of Latin America and the Caribbean (CAF), under the European Union's LAIF-PBC initiative, signed a Performance Agreement. The sole purpose of this agreement was to allocate economic incentives (grant funding) to the Municipality of Guayaquil for the installation and operation of a landfill gas capture and flaring system at the Las Iguanas landfill. This agreement was formalized under Ecuador's Sectoral Mitigation Mechanism for the solid waste sector. The effective period for methane emission avoidance was defined as a 15-month span, from October 1, 2021, to December 31, 2022. During this period, the project achieved emissions reductions totaling 242,707 tCO₂e, as verified by ICONTEC (VVB). Energy utilization beyond gas flaring was not applicable during this phase, as the performance-based funding exclusively covered the initial installation and operation costs of the flaring system. Recognizing the necessity of securing ongoing revenue to sustain operations after the conclusion of the CAF-EU/LAIF agreement, the Municipality of Guayaquil initiated efforts to access carbon credits for the post-agreement period. This intention was formally communicated to the UNFCCC on March 16, 2021, through a notification expressing the Municipality's interest in applying under the Clean Development Mechanism (CDM). However, the process of identifying viable climate finance mechanisms was hindered throughout 2023 and 2024 by various institutional barriers, including the absence of a legal and operational entity capable of ensuring carbon ownership and its potential transfer to the Municipality. The following key milestones led to the establishment of CIRCULAR EP: • May 14, 2023: A new municipal administration assumed office, continuing the interest in obtaining carbon credits due to the lack	

of economic incentives following the expiration of the CAF-EU/LAIF agreement.

- **September 2023:** A technical evaluation commenced to explore potential uses for the biogas generated at the Las Iguanas landfill. At that time, according to its city charter, the municipal administration lacked formal authority over energy recovery and waste valorization, prompting the proposal of a new institutional framework— a new public company (CIRCULAR EP).
- **May 13 and 16, 2024:** The first and second municipal council debates were held regarding the creation of the new public company.
- **June 16, 2024:** The official establishment of CIRCULAR EP was approved. The company was founded with a clear mission: "To comprehensively manage the solid waste of the Guayaquil canton, ensuring the utilization, valorization, treatment, and final disposal of non-hazardous solid waste with social and environmental responsibility, in an efficient, technical, integrated, and transparent manner, contributing to the development of a city characterized by solidarity and opportunity."
- **September 18, 2024:** CIRCULAR EP initiated the procurement process for consulting services to document, validate, verify, and certify the emission reductions achieved by the existing methane capture and flaring system. This phase aims to facilitate the project's registration under a carbon credit certification program and ensure its financial sustainability through the issuance and sale of carbon credits. The feasibility and implementation of new biogas-to-energy initiatives is also under consideration.
- **February 19, 2025:** Due to the lack of national capacity to fulfill the consulting services outlined by CIRCULAR EP, the government authorized the company to engage international consultants. This led to the signing of a contract with the selected advisory firm, Atmosphere Alternative SAS, on June 26, 2025.

In summary, although the project has been operating continuously since the conclusion of the CAF-EU/LAIF agreement, it is only in 2025 that the legal and operational framework has been established to initiate the registration process under an international carbon certification program. This step aims to secure carbon finance to support the ongoing operation of the project activities.

The overarching objective of the Municipality of Guayaquil, in collaboration with CIRCULAR EP as the project developer, is to establish a reliable carbon finance mechanism to achieve the following goals:

1. Ensure the continued operation of the landfill biogas capture and flaring system at the Las Iguanas landfill.
2. Secure dedicated funding—separate from landfill operational budgets—for the design, procurement, installation, and operation

	of a landfill gas-to-energy system. This system will complement the existing project by generating electricity from captured biogas, covering the energy needs of landfill operations and supplying the surplus to the national grid. Currently, the power generation component is in the feasibility stage, with implementation targeted for the second half of 2026, contingent upon the availability of reliable financial support from carbon finance.
Reason for deviation	Via its consultant Atmosphere Alternative, the Project Proponent Circular EP respectfully requests that the Technical Advisory Committee (TAC) consider the exceptional circumstances surrounding this project initiative and provide a favorable opinion on the following two aspects: 1. A deviation of the Prior Consideration rules (4.1.49 Principles and Requirements V2.1). According to the GS4GG guidelines, projects submitted more than one year after their start date are not eligible for certification. The start date is defined as the earliest date on which the Project Developer has committed to expenditures related to the implementation of the project. In this case, the project start date may be considered to be December 12, 2019, when the Performance Agreement between the Municipality of Guayaquil and the Development Bank of Latin America and the Caribbean (CAF), under the European Union's LAIF-PBC initiative, was signed. This agreement marked the formal commitment to install and operate the landfill gas capture and flaring system using grant funding from LAIF-PBC. The actual operational start date of the project activity was October 1, 2021. The Project Proponent is therefore requesting a deviation from the one-year submission rule, acknowledging that the certification request is being submitted more than one year after the project start date. 2. A deviation of the Crediting Start Date rule (10.2.1 GHG Emissions Reduction & Sequestration Product Requirements Ver. 3.1) This rule states that the crediting period must begin on the date of project operation or up to two years prior to the date of Project Design Certification, whichever is later. The Municipality of Guayaquil has continued to operate and maintain the landfill gas capture and flaring system since the conclusion of the CAF-EU/LAIF performance agreement and the associated grant funding. Given the absence of external financial support, the Municipality requests that the Crediting Start Date be set as January 1, 2023, which marks the beginning of the project's operation without any new external funding. The Project Owner is prepared to demonstrate that the landfill gas (LFG) capture and flaring system is not economically sustainable under current conditions and that there are no available financial resources to leverage funding for the planned power generation system.

	The request for Gold Standard certification could not be submitted earlier due to unresolved institutional barriers faced by the Municipality of Guayaquil during 2023 and 2024. These barriers delayed the establishment of a legal entity capable of ensuring carbon ownership and its transfer to the Municipality, in accordance with the host country's legal framework. In summary the project developer is requesting two different deviations. 1. Authorization that the project activity is eligible for Gold Standard certification despite the project certification request being submitted more than one year after the project start date. 2. Authorization that the starting crediting period will be January 1, 2023, considering that the Municipality of Guayaquil has guaranteed the continued operation of the LFG capture system without grant funds which is necessary to obtain financial viability and support the new process of power generation.
Proposed resolution	The Project Developer is prepared to provide evidence and transparent documentation during the Preliminary Review and Design Certification process to demonstrate the following: 1. The ongoing operation of the current landfill gas (LFG) system would not be financially feasible without carbon finance. Since the LFG system operates independently from the landfill's core activities, its operational costs must be covered by public resources. Therefore, carbon finance is essential to ensure the system's continued operation and effective management. 2. Institutional barriers prevented the timely submission of the Project Certification request following the conclusion of the CAF-EU/LAIF agreement. The Project Developer will present supporting documentation showing that the official establishment of the CIRCULAR EP entity was the only legally viable option for carbon transactions under Ecuadorian law. 3. The Project Developer can demonstrate that the design, installation, and equipment procurement for the LFG-based power generation system is not economically or financially feasible without carbon finance. The project presents a unique opportunity to enhance contributions to the Sustainable Development Goals (SDGs), with credible mitigation outcomes that could be achieved through the full implementation of the project activity.
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	Select the relevant area: ☐ Project design ☒ Local stakeholder consultation ☐ Safeguarding principles ☐ SDG assessment ☐ Regulatory compliance

	☐ Additionality ☐ Applicability of methodology ☐ Annual emission reduction volume <i>(if yes, fill the table below)</i>						
	<table border="1"> <thead> <tr> <th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/removal after applying deviation</th></tr> </thead> <tbody> <tr> <td>XYZ tCO_{2e}</td><td>XYZ tCO_{2e}</td></tr> <tr> <td></td><td></td></tr> </tbody> </table>	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO _{2e}	XYZ tCO _{2e}		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
XYZ tCO _{2e}	XYZ tCO _{2e}						
	☐ any other matrix, please specify...						
Summary of the impact	The Local Stakeholder Consultation shall be conducted under exceptional circumstances, considering the extended operational period of the LFG capture and flaring system at Las Iguanas Landfill. We expect the Stakeholder Consultation and Engagement Requirements can be fully met in all technical and procedural aspects, with the difference that it will be undertaken after the start of implementation. This primary risk is that the project activity (LFG Capture and Power Generation)—focused on environmental mitigation and sustainable development—may not be immediately distinguishable by the local community from the general landfill operations. Therefore, the consultation process will include targeted efforts to clearly communicate the scope, benefits, and impacts of the project activity as distinct from routine landfill management.						
Insert text here							

6.3 | VVB information

Is a VVB opinion on the deviation request required? <i>VVB opinion shall be included, where required by the requirements under <u>Deviations Request Requirements and Procedures</u> or request is submitted by the VVB.</i>	Yes ☐ No ☒ <i>If answer is yes, fill the information in section 6.4 below.</i>
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6.4 | VVB's assessment

The below information is to be completed by VVB, if applicable.		
VVB's assessment of deviation request	Please confirm the nature of deviation.	
VVB's assessment of impact of deviation request	N/A	
VVB recommendation		
VVB details	VVB name:	
	Auditor name(s):	

	Email (s):	
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6.5 | Documents:

6.5.1 | List of documents provided (*note that once a decision has been made by Gold Standard, this deviation form will be made public on the Gold Standard website. Kindly refrain from including any confidential information in the form.*)

Document 1.

Document 2.

Document n.

DOCUMENT HISTORY

VERSION NUMBER	RELEASE DATE	DESCRIPTION
6.0	12.11.2024	Editorial and structural changes to the template
5.0	11.04.2022	Additional information added: - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved - Guidance on VVB opinion
4.0	14.01.2021	Editorial changes
3.0	16.07.2020	Editorial changes
2.0	03.05.2018	Editorial changes
1.0	01.07.2017	Initial adoption