

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

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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-192
Date of decision	05/08/2025
Decision	☒ Approved [for delay in validation] ☐ Conditionally approved ☒ Not approved [for extension of retroactive issuance claim]

4.2 | Decision

4.2.1 | Decision Summary

The request for deviation is partially approved for a three-month extension to the deadline for completing the Validation process, i.e., the new deadline is October 27, 2025.

The request for claiming credits beyond 2 years from the date of Project Design Certification is rejected. The project developer must follow the requirement from paragraph 5.1.37 of the GS principles and requirements version 2.1.

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

The project developer shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the project developer. The project developer shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision.

The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the project document

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

The validating VVB shall, through appropriate means at disposal, evaluate the project's compliance with the above-mentioned conditions and provide VVB opinion in the validation report.

4.2.4 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the project developer and the VVB for appropriateness, accuracy and consistency.

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	

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 (specify...)

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

Item	Information
Name ³ :	Daniela Provoste
Email ID ⁴ :	dprovoste@revalora.org
Organisation: ⁵	Revalora SpA
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	GS12193	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Chile		

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.

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

Project Title	Emission reduction from plastic recycling, Chile									
Registry link	https://registry.goldstandard.org/projects/details/4202									
Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>									
Certification Status and corresponding date of latest status	☒ Listed <i>27/07/2023</i>	☐ Certified design <i>dd/mm/yyyy</i>	☐ Certified project <i>dd/mm/yyyy</i>	☐ Other <i>If other, specify here</i> <i>dd/mm/yyyy</i>						
Applied version of Standard	☒ GS4GG ☐ Previous version of Gold Standard									
	<table border="1"> <tr> <td colspan="2">Version no.</td> </tr> <tr> <td>☐ 1.0</td> <td>☐ 1.1</td> </tr> <tr> <td>☐ 1.2</td> <td>☐ 2.2</td> </tr> </table>				Version no.		☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
Version no.										
☐ 1.0	☐ 1.1									
☐ 1.2	☐ 2.2									
Transition date, if applicable	From previous GS version to GS4GG		<i>dd/mm/yyyy</i>							
	From another standard to GS4GG		<i>dd/mm/yyyy</i>							
	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 <i>Insert name here</i>									

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	Insert Text here		
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 <i>Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number</i>		

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	Principles and Requirements
	Version	Version number V. 2.1
	Paragraph	Para 5.1.16 Para 5.1.37

6.2 | Description of the deviation

Title	Extension to complete Validation/Verification	
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)
	Insert Text here (if required) to support the selection	
Relevant monitoring period, if applicable	Start date	01/08/2023
	End date	31/12/2024
Summarise the changes	The Project Developer (PD) is requesting a deviation from Gold Standard for Global Goals Principles and Requirements v1.2, Sections 5.1.16 and 5.1.37: <i>5.1.16. The Project shall complete Validation (defined as the date of submission of Validation Report by the VVB) within two years of successful listing of the project.</i> The project was listed on July 27, 2023. Therefore, the project must complete validation by July 27, 2025. Nevertheless, during the development phase, the PD faced significant challenges related to project execution. These included difficulties in coordinating project activities across teams located in different countries, which led to delays in communication and decision-making. Furthermore, the initial implementation approach had to be restructured due to technical inaccuracies and misinterpretation of the applicable methodology, requiring several months of additional work. These issues significantly affected the project's ability to meet key milestones within the expected timeframe. This deviation purpose is to request an extension to undergo Design Certification passed July 27, 2025 (later than two years after listing). In addition to the deviation request under Section 5.1.16, the Project Developer would also like to request consideration under Section 5.1.37. <i>5.1.37: The project may take into account retroactive period for</i>	

	<i>performance Certification of Certified Impact Statement and /or Products. The maximum period for Retroactive Certification is two years prior to the date of Project Design Certification unless otherwise stated in a specific Methodology or Product Requirements</i> The first monitoring period under consideration began on August 1, 2023. However, due to the delays outlined above and the projected timeline for completing validation and subsequent design certification, it is likely that the project will not achieve Design Certification before August 1, 2025. As such, the retroactive eligibility of this monitoring period would be compromised under the current rules. In light of the documented progress, the substantial efforts made to recover from early challenges, and the advanced status of the validation and verification processes (both of which are currently progressing in parallel), the Project Developer respectfully requests a deviation under Section 5.1.37 to allow for the inclusion of the current monitoring period in the initial issuance of Certified Impact Statements. Furthermore, it is important to highlight that both processes, Validation and Verification are being carried out jointly based on the original monitoring period. This integrated approach reflects the intention to streamline the certification process and further supports the justification for maintaining the eligibility of the retroactive period. It is also worth noting that postponing the start of the period would likely result in higher Emission Reductions (ERs), due to improved operational stability over time. Therefore, maintaining the original period reflects a conservative approach and demonstrates the Project Developer's intention to uphold the integrity and credibility of the claimed impacts.
Reason for deviation	The project "Emissions Reduction from Plastic Recycling, Chile," developed by Revalora SpA, aims to promote sustainable plastic recycling through a facility located in Valparaíso. It collects plastic waste from the informal sector which, under the baseline scenario, would otherwise end up in municipal solid waste streams. By replacing virgin materials with recycled inputs, the initiative claims measurable emission reductions. Revalora's core activity focuses on the recovery and valorization of plastic waste—such as LDPE, HDPE, PP, and PET, among others. As it was mentioned before, the PD successfully listed the project on July 27, 2023, being required to reach the design certification before July 27, 2025. However, the PD faced significant challenges related to project execution. A limited grasp of the applicable international methodology (CDM/Gold Standard) led to early calculation errors and, after approximately eight months of work, revealed the need for a complete reformulation of the technical approach—resulting in the loss of valuable time and resources. These issues were further compounded by communication difficulties, as the individual assigned to the role of Responsible Environmental Project GS was based outside of Chile. This remote management setup limited effective coordination with the local team, hindered timely decision-making, and negatively impacted the

	control and monitoring of activities and deadlines. Consequently, a strategic decision was made to reassign the role. A new project lead was formally appointed on March 06, 2025, to improve local coordination, strengthen oversight, and ensure alignment with the applicable requirements. Although the new lead brought renewed momentum to the project, faced a steep learning curve to fully understand its background and context. By the time the transition occurred, delays had already accumulated, requiring the new team to take over the project with pre-existing setbacks, which further complicated efforts to meet the required documentation and procedural milestones. The new lead assumed responsibility not only for technical and data-gathering tasks but also for overseeing compliance with requirements and ensuring the quality of deliverables. Ultimately, the original lead was formally dismissed, consolidating a new team structure better aligned with the project's technical and managerial demands. Despite the challenges encountered, the Project Developer has achieved significant progress. The VVB was contracted on October 21, 2024, to run in parallel the validation and the verification for the first monitoring period. The PD also notified Gold Standard about the commencement of this process on May 09, 2025, via email. The on-site audit visit was conducted on December 12, 2024. The initial PDD and related documents were submitted to the VVB on December 10, 2024, for the desk review. Subsequent review rounds were completed by July 2025 and is now under review by the Technical Reviewer (TR). In parallel, the Monitoring Report for Verification was as well submitted in March 28, 2025 for Desk review, and the team is currently addressing comments received from the VVB. These milestones reflect the Project Developer's ongoing commitment to completing the certification process in line with Gold Standard's expectations. The upcoming stages include: (i) completion of the VVB review process for the Verification documents, (ii) review by the TR, and (iii) final revision of the both Validation and Verification outputs by the Approval. Based on current timelines and previous review rounds, the Project Developer estimates that the remaining steps will require approximately three months to be fully completed. The Project Developer remains fully committed to completing the Validation process within the shortest possible time frame. The deviation is requested on the grounds that the PD acted in good faith and was unable to move in a timely manner due to significant managerial, methodological, and operational challenges during the different stages of project development.
Proposed resolution	This deviation request seeks a three-month extension to the deadline for completing the Validation process, defined as the date of submission of the Validation Report by the VVB, shifting it from July

	27, 2025, to a new deadline of October 27, 2025. In addition, the Project Developer respectfully requests an exception to Section 5.1.37, which limits the retroactive period for performance certification to two years prior to the date of Project Design Certification. Given that the first monitoring period began on August 1, 2023, the extension to October 2025 would otherwise result in this period exceeding the allowable retroactive window. This proposal would not impact the integrity of the project or any methodology requirements						
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>11,871 tCO₂e</td><td>11,239 tCO₂e</td></tr> <tr> <td></td><td></td></tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	11,871 tCO ₂ e	11,239 tCO ₂ e		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
11,871 tCO ₂ e	11,239 tCO ₂ e						
Summary of the impact	Describe the impact of the deviation on each relevant aspect of the project as selected above. Please substantiate the impact assessment with relevant and verifiable data/information.						
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 Deviations Request Requirements and Procedures 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		
VVB recommendation		
VVB details	VVB name:	
	Auditor name(s):	
	Email (s):	

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. 23.07.27 Listed - Confidential

Document 2. 24.10.21 VVB Contract - Confidential

Document 3. 24.12.10 PDD submitted to VVB - Confidential

Document 4. 24.12.12 CDM-D-28 Onsite-Verification Audit Plan Recycling SPA – Confidential

Document 5. 25.03.06 Email communicating role change - Confidential

Document 6. 25.03.28 Monitoring Report submitted to VVB - Confidential

Document 7. 25.05.09 Notification to GS - Confidential

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