

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.

Table of Content

1 General Guidelines.....	2
1.1 Applicability.....	2
2 Submission of deviation form	2
3 Implementation of deviation decision	2
4 Decision summary	4
4.1 General information.....	4
4.2 Decision.....	4
4.3 Applicability to other activities	5
5 Deviation Request Details.....	6
5.1 Submitted by.....	6
5.2 Details of the entity and its representative submitting the form	6
5.3 Background information.....	6
5.4 Project deviation history	7
6 Deviation detail	7
6.1 Standard document reference.....	7
6.2 Description of the deviation.....	7
6.3 VVB information.....	20
6.4 VVB's assessment	20
6.5 Documents:	20

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVREQ-194
Date of decision	19/09/2025
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

This deviation request is not approved.

Use of Tool 30 for New submissions after 30 June 2025: This approach is not approved. As per "RULE UPDATE - fNRB application for GS4GG certification" section 2.2, "After June 30, 2025, project developers shall use one of the eligible methods listed below to estimate fNRB values for any design certification, crediting period renewal, or VPA inclusion requests" and "For design certification or renewal of crediting periods (including standalone activities, PoAs, real or regular case VPAs, VPA/CPAs, or inclusion of regular case VPAs), CDM Tool 30 validity ends on June 30, 2025". Based on this rule update, and the date of submission of your regular case VPAs, the use of TOOL 30 will not be allowed for design certification.

Regular VPA crediting period start date: The start date of the crediting period shall follow the PoA requirements that states in para 5.4 and 6.3 "Unless otherwise stated in a specific Methodology or Product Requirements, the crediting period start date of real case VPA is either the VPA Start Date or two years prior to the date of Design Certification or Inclusion Date – whichever is later." PD shall ensure the crediting period start date of the regular VPAs are aligned with this requirement.

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

N/A - see above decision

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

VVB shall validate the compliance of the decision above and provide their opinion at the time of design review.

4.2.4 | Directions for the Gold Standard, if applicable

N/A

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)	

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 (specify...)

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

Item	Information
Name ³ :	Sally Burns
Email ID ⁴ :	sally@environmental.markets
Organisation: ⁵ :	Conservation Carbon Malawi
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 12151 GS XXXX	GS 12208 GS XXXX
Host country(ies)	Malawi		
Project Title	High Impact Cookstoves in Malawi by Ripple Africa (PoA)		
Registry link	https://registry.goldstandard.org/projects/details/4645		
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 <i>If other, specify here</i>

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	30/06/2025	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	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 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	fNRB APPLICATION FOR GS4GG CERTIFICATION
	Version	Version 1.0
	Paragraph	Para 1.2.1

6.2 | Description of the deviation

Title	- Use of Tool 30 for the Regular VPAs in line with the Design Certified real case VPA.
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	- Use the crediting period of the Design Certified real case VPA from 17/12/2022 onwards for the Regular VPAs.	
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)
	For the period prior to the rule being implemented until 30/06/2025.	
Relevant monitoring period, if applicable	Start date	17/12/2022
	End date	30/06/2025
Summarise the changes	<u>Allowing the use of fNRB Tool (Tool 30) for 6 Regular VPAs:</u> The Design Certified real case VPA uses Tool 30. We are requesting that the 6 Regular VPAs to be included use Tool 30 to calculate emission reductions for the monitoring period 17/12/2022 to 30/06/2025. The Regular VPAs could not be submitted before the 30/06/2025 Tool 30 deadline, as their submission was contingent upon the Real Case VPA (GS12208) receiving its Design Certification status. Despite prior expectations and communication with Gold Standard, the confirmation of Design Certification for GS12208 was only received on 30/06/2025 which was also the final day for inclusion, leaving insufficient time to submit the Regular VPAs. <u>Aligning the crediting period start date of 6 Regular VPAs with the registered real case VPA:</u> In addition, the overall delays experienced have also resulted in the 6 regular VPAs being eligible for submission much later than initially anticipated. We therefore request that the crediting period of the Regular VPAs align with the Design Certified real case VPA from 2022 (17/12/2022) onwards, as the stoves covered under these Regular VPAs were also distributed and operational during 2022. This ensures that emission reductions generated since the start of stove distribution are appropriately credited, avoiding loss of legitimate carbon revenue for activities already implemented on the ground.	
Reason for deviation	There are two reasons for Tool 30 to be applied to the Regular VPAs: - The rules in the Programme of Activity Requirements and Procedures v 3.0. - Delays by Gold Standard that were not in the control of the Project Developer that occurred at crucial dates resulting in the Project Developer not being able to meet recently imposed deadlines on the inclusion of Regular VPAs for the use of Tool 30.	

Reason to allow the crediting period of the Regular VPAs from year 2022 onwards

- The delays have also resulted in the Regular VPAs being eligible for submission much later than expected resulting in lost crediting period. . Aligning their crediting period with the Real Case VPA (from 17/12/2022 onwards) ensures that emission reductions generated from stove distributions carried out in 2022 are fully credited, maintaining financial viability of these already operational activities.

Please see definition of Regular VPA below from page 6 of the Programme of Activity Requirements and Procedures v 3.0. As per the definition, the Regular VPAs needs to follow the real case VPA. Hence the Regular VPAs needs to follow the same method of fNRB calculations as prescribed by real case VPA.

Regular VPA	An activity involving single measure or a set of interrelated measures implemented under a PoA that follow the framework/requirements set out by an associated real case VPA and PoA.
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Please also see para 6.9 from PoA Requirements, v 3.0, which clearly states that Regular VPAs to follow the modalities defined by the real case VPA.

6.9 | Estimation of emissions reductions or net anthropogenic removals

6.9.1 | The CME shall, in accordance with the modalities in the corresponding real case VPA, describe how to:

- a. undertake the ex-post calculation of baseline, project, and leakage GHG emissions by sources, or baseline and actual net anthropogenic GHG removals by sinks, as well as GHG emission reductions or net anthropogenic GHG removals to be achieved by each of the regular VPAs
- b. provide the ex-ante calculation of GHGs for each year of the crediting period
- c. describe all steps to be undertaken for calculations and provide all results.

6.9.2 | The CME shall, in accordance with the modalities in the corresponding real case VPA, provide the data and parameters that will not be monitored but are determined before the inclusion of the VPA and remain fixed throughout the

43

OPTIONAL REQUIREMENT- Programme of Activity Requirements and Procedures Ver 3.0

crediting period. These data and parameters shall be available at the time of the inclusion of the VPA.

6.9.3 | The CME shall ensure that the application of default data in the estimation of GHG emission reductions or net anthropogenic GHG removals for the proposed VPA is in accordance with the modalities in the corresponding real case VPA.

As per para 8.1, Preliminary review is not required for Regular VPAs:

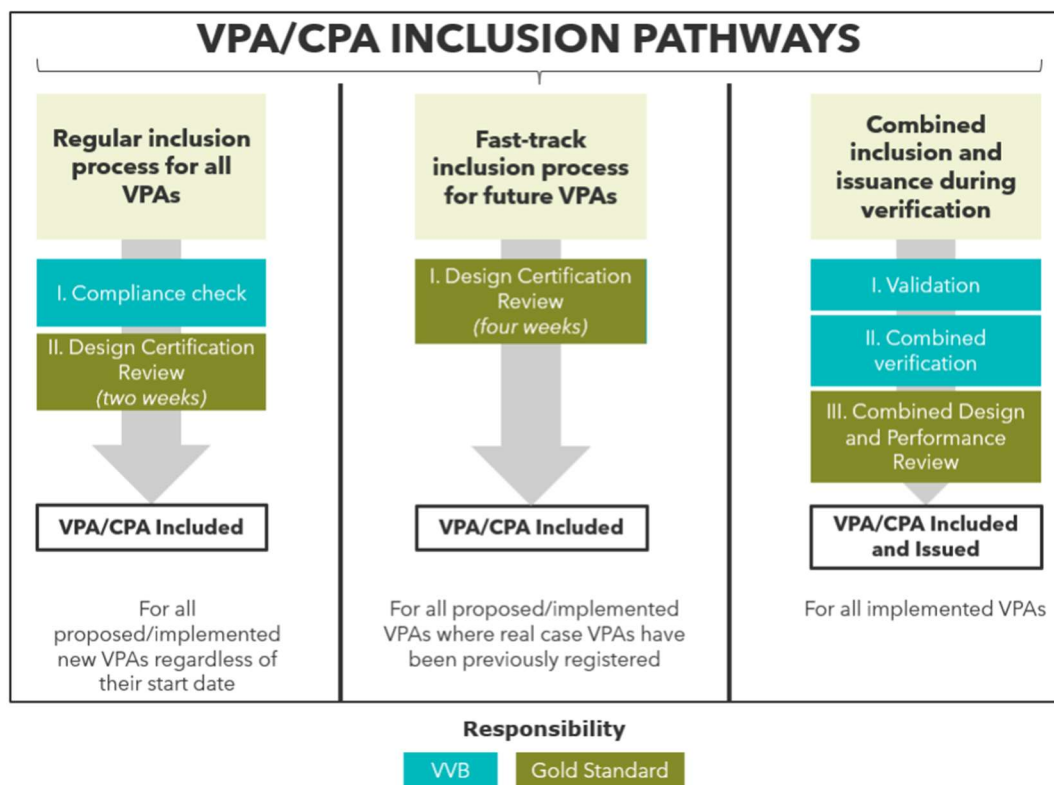
8.1 | General overview

8.1.1 | Certification for a PoA and its VPAs is based on a five-year renewable certification cycle as per the process below:

- a. Preliminary Review/Listing** - The Preliminary Review (time of first submission) is conducted at the outset of the PoA and its real case VPAs before Listing on the [Impact Registry](#). During the Preliminary Review, Gold Standard conducts a 4 week desk review to assess whether the proposed PoA and real case VPAs have the potential to conform to the applicable requirements and may therefore progress to the Listed status. Note that,
- PoA and its real case VPAs are required to undergo Preliminary Review, and both will be listed simultaneously upon completion of the preliminary review process; and
 - Regular VPAs (corresponding to a design certified real case VPA) requesting inclusion in a PoA are not required to go through preliminary review and may be submitted for inclusion following one of the VPA inclusion pathways, as applicable. Refer to VPA inclusion pathways, below.

CME has chosen pathway 3 “Combined inclusion and issuance of real case and Regular VPAs” to include the Regular VPAs under GS 12208 as per para 8.4, which clearly states that it is applicable to all the implemented VPAs:

8.4.3 | A regular VPA may be included in the PoA by following one of the applicable pathways mentioned below. The figure below provides a schematic of all the three VPA inclusion pathways.



iii. Combined inclusion and issuance of real-case and regular VPAs

8.4.13 | This pathway allows for inclusion and issuance of GSVERs for implemented VPAs in the PoA for achieving. This pathway entails the following three phases:

- a. **Validation/ compliance check:** The VVB shall conduct a validation (real case VPAs)/ compliance check (regular VPAs) for inclusion of new VPA in the PoA.
- b. **Verification:** The VVB shall conduct a verification of all new VPAs and/or any existing VPA. The VVB may combine verification assessment for all VPAs with same monitoring period start and end date in a single Verification Report. Also, the VVB may carry out a combined site visit for both validation and verification process.
- c. **Combined Design and Performance Review:** Gold Standard shall carry out a combined Design and Performance Review (6 weeks) of all new VPAs and Performance Review of all existing VPAs (as applicable) together.

8.4.14 | The combined design and performance review period starts when the relevant documents (VPA DD, VVB reports and other documents) are submitted to Gold Standard, and a completeness check of the documents is successful.

We were unable to submit the Regular VPAs before the 30/06/2025 deadline because the real case VPA (GS12208) did not receive official confirmation of design certification until 30/06/2025. As Regular VPAs must be included only after the real case is Design Certified, this left no time for compliant submission, despite our readiness and prior efforts. The delay in the certification notification was beyond our control and was caused by delays on the part of Gold Standard and SustainCERT review teams. While each individual delay may have appeared manageable, their cumulative impact resulted in many months of delay.

For example, please see below emails with Gold Standard during June and July with correspondence re the delays in receiving the response to Round 3. It can be seen in the emails that Gold Standard stated a date of 27/06/2025 to send the response. This would have been enough time to submit the Regular VPAs prior to the 30/06/2025 deadline, but the response was not received until 30/06/2025. This was 3 days after the stated date, also corresponding with the deadline. It is important to note that this is only the latest instance in an extended sequence of delays. Notably, the significant delays experienced earlier under SustainCERT, prior to Gold Standard assuming responsibility, have not been detailed here, though they materially contributed to the cumulative delays.

It is also important to note that we did not receive a response to our follow-up email sent to Gold Standard team on 10 July, which sought clarification regarding the delays in receiving the real case VPA's

	design certification. Unfortunately, our queries were not addressed, which has further prolonged the process and compounded the delay in submitting the Regular VPAs within the stipulated deadline. Re: Malawi GS12208 and GS12151 ◆ Summarise this email → Sally Burns <sally@environmental.markets> to Annyta, Vikash ▾ 10 Jul 2025, 07:05 (12 days ago) ☆ ↶ ⋮ Dear Annyta, Thanks for your email. Can you please put me in contact with someone more senior in the organisation? Many thanks, Sally On Thu, 10 July 2025, 00:07 Annyta Luo, <annyta.luo@goldstandard.org> wrote: Dear Sally, I want to clarify that there is no limitation on the assurance platform preventing the PD from creating a regular case VPA until the real case VPA and PoA design are certified. However, as it has been 9 days past the submission deadline and the regular case VPA has not been submitted yet, how you plan to demonstrate that you can submit a regular case VPA for design review by June 30, 2025. The PD can find the guidelines regarding the Assurance Platform's final transition phase, which includes the migration of open reviews from SustainCERT to Gold Standard, on the GS website starting April 30, 2025. I would like to remind you of the following key points: Two-Year Retroactive Claiming Period: Under GS4GG, the PD can claim realised ERs starting from the commission date or a maximum of two years prior to the date of design certification, whichever is later. Can your project start the crediting period in 2022? Submission Timeline for Regular Case VPA: A regular case VPA must be submitted within one year after the project start date for preliminary review or design review (fast-track inclusion pathway). If their crediting period start date is in 2022, are they eligible for GS certification? CDM Tool 30 Validity: As previously mentioned, the validity of CDM Tool 30 for design certification or renewal of crediting periods (including standalone activities, PoAs, real or regular case VPAs, VPA/CPAs, or inclusion of regular case VPAs) ends on June 30, 2025. If you wish to continue using CDM Tool 30, please follow the deviation procedure and provide justification on the submission delay. Please note that the deviation process is handled independently by another team, and the ARM team can not be involved. If you require assistance, please reach out to the helpdesk. Best regards, Annyta Luo Director, Assurance Review Management Email annyta.luo@goldstandard.org Gold Standard Geneva, Switzerland www.goldstandard.org
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From: Sally Burns <sally@environmental.markets>
Sent: Tuesday, July 8, 2025 6:27 AM
To: Annyta Luo <annyta.luo@goldstandard.org>
Cc: Vikash Talyan <vikash.talyan@goldstandard.org>
Subject: Re: Malawi GS12208 and GS12151

Dear Annyta,

Thanks for your email.

We were not able to submit the regular VPAs until the Real Case VPA had been Design Certified.

We are asking how Gold Standard will take into account delays from Gold Standard in relation to the 30 June deadline. There is the recent delay of 3 days (promised to submit 27 June and submitted 30 June). Also earlier with the transition from SustainCERT to the Assurance Platform, there was a 2 week delay with continued promises to finalise, but still a 2 week delay. It was also very unclear what the process was after the transition was made which took many emails to clarify. Prior to that we experienced lengthy delays from SustainCERT with late submissions from them.

These delays have now become critical as you are saying we cannot apply Tool 30 to our other 6 VPAs.

We understand that Tool 30 can only be applied until 31 Dec 2025, however our crediting period starts in 2022 and our projects have already been implemented so it is the past years we are concerned about.

Can we please organise a meeting to discuss these matters? If you are not the correct person please pass me onto the right person.

These matters are critical in the commercial viability of projects and it would be appreciated if they can be taken seriously. We would hope that considering it is not our error that we would not have to undertake the Deviation process.

Please let me know when we can have a meeting to discuss.

Best,
Sally

On Mon, 7 Jul 2025 at 22:37, Annyta Luo <annyta.luo@goldstandard.org> wrote:

Dear Sally,

I hope this message finds you well.

Have you created the regular case VPA entry and submitted the necessary documents so far? GS12208 and GS12151 were design certified on 30 June 2025.

If you plan to use CDM Tool 30 for fNRB, please ensure you follow the guidelines outlined in **110_V2.0_PAR_Deviation-Approval-Requirements-Procedures**.

I'd like to remind you that the validity of fNRB values calculated using either the methodology's prescribed method or CDM Tool 30 for any design certified activity will expire for GS4GG certification on December 31, 2025.

Best regards,

Annyta Luo
Director, Assurance Review Management

Email annyta.luo@goldstandard.org

Gold Standard
Geneva, Switzerland
www.goldstandard.org

From: Sally Burns <sally@environmental.markets>
Sent: Friday, July 4, 2025 5:43 PM
To: Annyta Luo <annyta.luo@goldstandard.org>
Cc: Vikash Talyan <vikash.talyan@goldstandard.org>
Subject: Re: Malawi GS12208 and GS12151

Dear Annyta,

We were supposed to receive a response on 27 June. If we had received the response on 27 June we would have had time to submit our regular VPAs before 30 June and therefore applied Tool 30.

Please advise as to how we can get an exception in this case due to the late response from Gold Standard.

Many thanks,
Sally

On Fri, 4 Jul 2025 at 11:49, Annyta Luo <annyta.luo@goldstandard.org> wrote:

Dear Sally,

Please refer to RU_2025_fNRB-application-for-GS4GG-certification.pdf

For design certification or renewal of crediting periods (including standalone activities, PoAs, real or regular case VPAs, VPA/CPAs, or inclusion of regular case VPAs), CDM Tool 30 validity ends on June 30, 2025.

Best,

Annyta Luo
Director, Assurance Review Management

Email annyta.luo@goldstandard.org

Gold Standard
Geneva, Switzerland
www.goldstandard.org

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From: Sally Burns <sally@environmental.markets>
Sent: Friday, July 4, 2025 9:29 AM
To: Annyta Luo <annyta.luo@goldstandard.org>
Cc: Vikash Talyan <vikash.talyan@goldstandard.org>
Subject: Re: Malawi GS12208 and GS12151

Dear Annyta,

Many thanks for your email.

We are very pleased the PoA and VPA have been design certified.

We are assuming that even though the response and design certification was received on the 30th of June and not the 27th of June, we can still add the remaining regular VPAs using Tool 30. Can you please confirm? The new rule states **anything after this date** cannot use Tool 30.

Many thanks,
Sally

On Mon, 30 Jun 2025 at 23:20, Annyta Luo <annyta.luo@goldstandard.org> wrote:

Dear Sally,

The subjected PoA and VPA has been design certified on AP. Please check updated project status.

If you have any further question, please reach out help@goldstandard.org.

Best,

Annyta Luo

Director, Assurance Review Management

Email annyta.luo@goldstandard.org

Gold Standard

Geneva, Switzerland

www.goldstandard.org

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From: Sally Burns <sally@environmental.markets>

Sent: Monday, June 30, 2025 1:56 PM

To: Annyta Luo <annyta.luo@goldstandard.org>

Cc: Anshika Gupta <anshika.gupta@goldstandard.org>; Vikash Talyan <vikash.talyan@goldstandard.org>

Subject: Re: Malawi GS12208 and GS12151

You don't often get email from sally@environmental.markets. [Learn why this is important](#)

Dear Annyta,

We did not receive anything on June 27. Can you please update us on the status of our project?

Many thanks,
Sally

On Tue, 24 Jun 2025 at 00:06, Annyta Luo <annyta.luo@goldstandard.org> wrote:

Dear Sally,

I wanted to update you on the current status of our reviews. The PD submitted the R3 response for GS12208 on June 13, 2025, and it is currently in progress. We will share our feedback by June 27, 2025.

Regarding the GS12151 PoA design review, there are no remaining issues. However, we are waiting for the closure of the VPA1 design review to approve both simultaneously.

Best regards,

Annyta Luo

Director, Assurance Review Management

Email annyta.luo@goldstandard.org

Gold Standard

Geneva, Switzerland

www.goldstandard.org

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From: Anshika Gupta <anshika.gupta@goldstandard.org>

Sent: Monday, June 23, 2025 11:04 AM

To: Sally Burns <sally@environmental.markets>; Annyta Luo <annyta.luo@goldstandard.org>

Cc: Vikash Talyan <vikash.talyan@goldstandard.org>

Subject: Re: Malawi GS12208 and GS12151

Dear Sally,

Thanks for writing in.

I am extremely sorry to hear that you have been having issues in the process. I would like to loop in my colleague from Assurance Review team who will be able to assist you further.

[@Annyta Luo](#) – Could you please help Sally with this. Thanks.

Best regards,

Anshika Gupta

Manager - Standard Development and Innovation

Please also refer to the email correspondence included below, which outlines the delays encountered during the transition from the SustainCERT platform to the new Assurance Platform. These system-level disruptions contributed to significant communication and processing delays, which directly impacted the timely completion of the Design Review for the real case VPA (GS12208):

Re: Re: Review - GS12151 / Design Certification Review - [#59590]

External

Malawi GS x



Summarise this email

Gold Standard <help@goldstandard.org>

Thu 8 May, 19:49



to me, schalk ▾

Hi Sally,

I understand your frustration - as soon as the technical team have migrated the requests, my team will be happy to support you as much as needed so that you can get your review underway.

I'm sorry that we cannot offer any better news in the meantime.

Best Wishes,

Nancy Mansell

Associate, Market Relations

Gold Standard

www.goldstandard.org

On Thu, 8 May at 10:46 AM , Sally Burns <sally@environmental.markets> wrote:

Hi Nancy,

Thanks for the update.

It's very disappointing news to be honest. We have had many delays not caused by us.

We have been through many findings already with SustainCERT and are hoping we receive the Design Certification now.

Best,

Sally

On Thu, 8 May at 10:34 AM , Gold Standard <help@goldstandard.org> wrote:

Hi Sally,

Thanks for your enquiry regarding the transition.

Unfortunately, our team are experiencing unforeseen challenges whilst migrating requests from the SustainCERT platform to the assurance platform. We therefore ask that you check the Design Review for GS12151 again on the **9th May**. From this date, your documents should have migrated across, and you should have the option to upload any for which this is not the case.

Please be assured that this is not an issue with your project alone and that the Gold Standard team are aware of it and working to resolve it as quickly as possible.

I apologise for the confusion that this delay has caused and will be happy to help if you have any further questions regarding this transition.

Best Wishes,
Nancy Mansell
Associate, Market Relations
Gold Standard
www.goldstandard.org

On Wed, 7 May at 9:53 PM , Sally Burns <sally@environmental.markets> wrote:

Hi Nancy,

Thanks for your email.

We have waited another week until 7 May. Our project has been on the **assurance platform** during this week, but as per the **TECHNICAL NEWSLETTER Assurance Platform Final Transition Phase**, all of the documents we have uploaded to SustainCERT **do not** appear on the **platform**. The newsletter states: *Note: all documentation provided by SustainCERT should already be migrated and included within the request*). This has not occurred. Or at least I cannot find the documents or any findings etc.

It is completely unclear what we need to do.

We have experienced many delays with our project with SustainCERT and the VVB. We are very concerned at this stage about the progress of the Design Certification and the future of the project.

If we can have a phone call would be much appreciated. Please also explain in an email what is going on.

Best,
Sally

On Tue, 6 May at 2:44 PM , Gold Standard <help@goldstandard.org> wrote:

Hi Sally,

I am following up on my previous email to ensure that you are up to date with our recent communication regarding the transition.

The next stages for Project Developers are as follows:

For projects that had open reviews with SustainCERT, we require project developers to review the migrated requests on the **Gold Standard Assurance Platform** from 7th May.

Further information regarding the steps that are required and how this may differ depending on project type can be found in our recent communication which went out on 30th April in our **technical newsletter**, as well as the **Final Transition Phase FAQs**. If you are not yet subscribed to Gold Standard's newsletter, we encourage you to **sign up** to stay informed. Please remember to tick "Gold Standard Technical Updates".

Please let me know if you have any questions on this.

Best Wishes,
Nancy Mansell
Associate, Market Relations
Gold Standard
www.goldstandard.org

	Please also refer to many emails sent to help@goldstandard.org during the period before the transition away from SustainCERT outlining significant delays caused by SustainCERT during the Validation and Desing Certification. A change in fNRB value from 83% (as per Tool 30) to the new default of 48% would result in a significant reduction of emission reductions across the 6 Regular VPAs. This would adversely affect the financial viability of these activities, which are already operational on the ground and depend on carbon revenues for continued implementation.				
Proposed resolution	- We propose that the 6 Regular VPAs be allowed to apply Tool 30 for the monitoring period from 17/12/2022 to 30/06/2025, consistent with the real case VPA (GS12208). - We propose that the crediting period of the 6 Regular VPAs align with the real case VPA from 17/12/2022 to 30/06/2025. This solution does not contravene any related requirements and the accuracy, completeness and conservativeness is ensured.				
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 (if yes, fill the table below) The difference in ERs for the monitoring period 17/12/2022 to 30/06/2025 for the 6 Regular VPA is shown below: <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>581,344 tCO₂e (at 48% default fNRB)</td><td>941,810 tCO₂e (at 83% fNRB using tool 30)</td></tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	581,344 tCO ₂ e (at 48% default fNRB)	941,810 tCO ₂ e (at 83% fNRB using tool 30)
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				
581,344 tCO ₂ e (at 48% default fNRB)	941,810 tCO ₂ e (at 83% fNRB using tool 30)				
Summary of the impact	This deviation does not affect the methodological integrity or accuracy of the emission reduction calculations, as the six Regular VPAs were implemented under the same baseline conditions, technological specifications and geographical boundary as the real case VPA (GS12208).				

Insert text here

6.3 | VVB information

Is a VVB opinion on the deviation request required?

VVB opinion shall be included, where required by the requirements under [Deviations Request Requirements and Procedures](#) or request is submitted by the VVB.

Yes ☐ No ☒

If answer is yes, fill the information in section 6.4 below.

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.

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