

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	DEVQR-219
Date of decision	27/10/2025
Decision	<input checked="" type="checkbox"/> Approved [No precondition to apply the deviation decision] <input type="checkbox"/> Conditionally approved [Decision is subject to compliance with the precondition defined below] <input type="checkbox"/> Not approved [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

The deviation request is approved as the extension to the approved deviation DEVQR-140 for only allowing for the inclusion of VPAs: GS13183, GS13184, GS13185, GS13186, GS13187, GS13196, GS13197, and GS13198 under the PoA GS11949 to be submitted within two years of the grouped physical meeting and conducting site visit by VVB within two years of the VPA's crediting period.

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

This approval is exclusively for the regular VPAs with the following GSIDs: GS13183, GS13184, GS13185, GS13186, GS13187, GS13196, GS13197, and GS13198.

Nevertheless, the CME is required to comply with all other applicable standard requirements, except where explicitly exempted in the deviation decision.

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

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

4.2.4 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the CME 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does this decision set a precedent for future projects with similar circumstances? ²	<input type="checkbox"/> Yes <input type="checkbox"/> No
Precedent details (if applicable to other activities)	
<hr/>	

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 :	Joost van Lier
Email ID ⁴ :	joost.van.lier@blueworldcarbon.com
Organisation: ⁵ :	Blue World Carbon Asset Management (Pty) Ltd
Are you an authorized project participant as per the cover letter submitted for this activity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

5.3 | Background information

Type	<input type="checkbox"/> Project activity	<input type="checkbox"/> PoA GSXXXX	<input checked="" type="checkbox"/> VPA
GS ID			GS 13183 GS 13184 GS 13185 GS 13186 GS 13187 GS 13196 GS 13197 GS 13198
Host country(ies)	South Africa		
Project Title	GS11949 GS11996 RVPA-4 Small-scale solar electrical programme, South Africa GS11949 GS11996 RVPA-5 Small-scale solar electrical programme, South Africa GS11949 GS11996 RVPA-6 Small-scale solar electrical programme, South Africa		

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

	GS11949 GS11996 RVPA-7 Small-scale solar electrical programme, South Africa									
	GS11949 GS11996 RVPA-8 Small-scale solar electrical programme, South Africa									
	GS11949 GS11996 RVPA-9 Small-scale solar electrical programme, South Africa									
	GS11949 GS11996 RVPA-10 Small-scale solar electrical programme, South Africa									
	GS11949 GS11996 RVPA-11 Small-scale solar electrical programme, South Africa									
Registry link	https://platform.sustain-cert.com/certification/projects									
Scale	<input type="checkbox"/> Microscale (GS) <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale <input type="checkbox"/> Other, if applicable please specify below <i>Insert text here</i>									
Certification Status and corresponding date of latest status	<input type="checkbox"/> Listed	<input type="checkbox"/> Certified design	<input type="checkbox"/> Certified project	<input checked="" type="checkbox"/> Other <i>If other, specify here</i> 27/11/2024 & 02/12/2024 (creation dates)						
Applied version of Standard	<input checked="" type="checkbox"/> GS4GG <input type="checkbox"/> Previous version of Gold Standard									
	<table border="1"> <tr> <td colspan="2">Version no.</td> </tr> <tr> <td><input type="checkbox"/> 1.0</td> <td><input type="checkbox"/> 1.1</td> </tr> <tr> <td><input type="checkbox"/> 1.2</td> <td><input type="checkbox"/> 2.2</td> </tr> </table>				Version no.		<input type="checkbox"/> 1.0	<input type="checkbox"/> 1.1	<input type="checkbox"/> 1.2	<input type="checkbox"/> 2.2
Version no.										
<input type="checkbox"/> 1.0	<input type="checkbox"/> 1.1									
<input type="checkbox"/> 1.2	<input type="checkbox"/> 2.2									
Transition date, if applicable	From previous GS version to GS4GG									
	From another standard to GS4GG		08/12/2023 (design certification of GS11949)							
	Name of another standard		<input checked="" type="checkbox"/> CDM <input type="checkbox"/> Other Name of the Standard – Insert text here							
Applicable activity requirement	<input checked="" type="checkbox"/> Renewable Energy Activity Requirements <input type="checkbox"/> Community Services Activity Requirements <input type="checkbox"/> Land-use and Forests Activity Requirements <input type="checkbox"/> 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.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Reference number	DEVREQ-140		
Status of the deviation	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Rejected	<input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Summary of the findings These VPAs do not meet the eligibility criteria for GS certification as per RC_2024_Regular VPAs - Definition of the first submission. VPAs must be submitted within two years of the grouped physical meeting. For VPAs included via the Fast Track pathway, a site visit by the Validation and Verification Body (VVB) must occur within two years of the VPA's start date.		

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	Regular VPAs - Definition of the first submission
	Version	V1.0
	Paragraph	para 1.1.4
Standard document reference	Title	Programme of Activity Requirements and Procedures
	Version	V3.0
	Paragraph	para 5.7.3 (d) & para 8.4.12

6.2 | Description of the deviation

Title	Inclusion of Regular VPAs Beyond the 1-Year Start Date Limitation Due to Delayed by CDM PoA Transition Process	
Confirm the nature of changes related to deviation	<input type="checkbox"/> Temporary (e.g. not expected to occur beyond one monitoring period)	<input checked="" type="checkbox"/> Permanent (e.g. deviation from requirements prior to submission for certification)
	We are going through the VPA design certification	
Relevant monitoring period, if applicable	Start date	
	End date	
Summarise the changes	We respectfully submit this request for a deviation from the following requirements:	

	<p>(a) the current "Regular VPAs – Definition of the first submission" rule (published 22/02/2024), which requires the inclusion of regular VPAs within one year of their start date; and</p> <p>(b) Programme of Activity Requirements and Procedures (version 3.0), which require that regular VPAs be submitted within two years of the grouped physical stakeholder consultation meeting, and that a subsequent site visit by a VVB takes place within two years of the regular VPA start date (for VPAs included via the Fast Track pathway).</p> <p>Deviation request DEVRQ-140 for exemption from the definition of the first submission for the VPAs have previously been submitted and approved by Gold Standard.</p> <p>We are now amending approved deviation DEVRQ-140 and, in addition, seeking permission to include VPAs RVPA-4 to RVPA-11 within two years of the 2023 grouped physical meeting as well as to conduct the required site visits by the VVB within the first two years of the crediting period, as part of the first verification currently scheduled for 2026.</p>				
Reason for deviation	<p>Our Programme of Activities (PoA GS11949, originally CDM PoA 7484) was first registered under the CDM in 2012. The PoA was developed through robust stakeholder engagement, fulfilling the CDM requirements including the establishment of eligibility criteria such as:</p> <p><i>Criterion 4: "The start date of the activity under CPA (type 1 and type 2) shall be after the date of start of the global stakeholder process for the PoA (23/12/2011)."</i></p> <p>Following a successful crediting period renewal in Q4 2020, and continued inclusion of CPAs through 2020-2022, we initiated the transition to GS4GG in June 2022 due to uncertainty around the CDM's future. This transition was crucial to continue supporting the renewable energy projects that rely on our PoA for carbon offset revenue, particularly within the domestic South African Carbon Tax Offset market.</p> <p>The transition process took over 18 months and included:</p> <ul style="list-style-type: none"> • Document preparation • Comprehensive alignment with GS4GG rules; • Conducting stakeholder consultations; • Securing regulatory approvals from South African authorities (e.g. eLoA), the key requirement to be able to trade VERs locally (South African Carbon Tax Offset system); • Design certification by GS4GG <p>Here is the milestone table for your reference</p> <table border="1"> <thead> <tr> <th>Date</th><th>Milestone</th></tr> </thead> <tbody> <tr> <td>Q2 2022</td><td>Initiated assessment of CDM alternatives due to growing uncertainty regarding the mechanism's future.</td></tr> </tbody> </table>	Date	Milestone	Q2 2022	Initiated assessment of CDM alternatives due to growing uncertainty regarding the mechanism's future.
Date	Milestone				
Q2 2022	Initiated assessment of CDM alternatives due to growing uncertainty regarding the mechanism's future.				

	June 2022	Commenced documentation and preparation for the transition of the PoA to GS4GG
	Mid 2022	Submitted prior consideration to the CDM Executive Board for an additional 11 CPAs (CPA-101 to CPA-111), currently designated RVPA-1 to RVPA-11. CDM Prior Consideration Link However, the new CDM inclusion process was subsequently paused due to persistent uncertainty surrounding the CDM's continuity. Further progress was contingent upon the CME demonstrating the ability to deliver carbon credits under GS4GG to the project owners. Activity owners expressed significant concern and requested proof of concept under the new system
	September 2022	Final batch of CPAs (currently VPA-009 to VPA-015) successfully included under the CDM PoA
	07/10/2022	PoA profile successfully created on the SustainCERT platform: platform.sustain-cert.com
	Q4 2022 – Q1 2024	Undertook detailed preliminary reviews and design certification with the VVB, SustainCERT, and GS4GG.
	Q1 – Q2 2023	Grouped stakeholder consultation process under GS4GG, including addressing the identified gaps between the original CDM consultations and GS4GG requirements.
	05/04/2023	Public consultation meeting held at Noordhoek Hotel Conference Centre.
	Q2 2023 – now	Continuous stakeholder identifying and stakeholder database expansion as per GS4GG requirements.
	08/02/2024	Submission of application for the required regulatory approval (eLoA) by BWC to facilitate VER trading under the South African Carbon Tax Offset system
	22/02/2024	Formal request received from the Designated National Authority (DNA) to conduct a site inspection.
	29/02/2024	Completion of on-site inspection with the DNA
	28/03/2024	Receipt of eLoA dated 26/03/2024 from the South African authorities.
	April 2024	Demonstration to the project owners that GS4GG route actually works. Initiated collection of supporting documentation for the inclusion of VPAs, including RVPA-4 to RVPA-11.
	Q1 2025 – Q2 2025	Second grouped stakeholder consultation under GS4GG, including a physical meeting and feedback round.
	Due to this extensive and time-bound transition process, we were unable to submit new VPAs until Q3 2024, including RVPA-4 to RVPA-11, by which time the standard timelines for first submission and site visits had passed.	

The PoA has been successfully transitioned and design certified on 29/01/2024 with the same eligibility Criterion 4 (see above).

The recent rule clarification introduced on 22/02/2024 introduced a new time restriction that was not visible in GS4GG rules and requirement prior to that date. This placed RVPA-4 to RVPA-11 at an unintended disadvantage despite their clear eligibility under the PoA's original and validated start date criteria

We respectfully request a deviation based on the following:

1) Clear Intent and Transparency

- Prior consideration for RVPA-4 to RVPA-11 was submitted to the CDM Executive Board in Q3 2022 to demonstrate our intention and timeline based on the rules available at that point in time.
- These projects were placed on hold only because the CME could not proceed with submissions until the PoA transition was finalized and approved by both GS4GG and South African regulatory authorities. The delay in formal submission was entirely due to the transition to GS4GG and regulatory procedures (including eLoA approval).
- Stakeholder consultations applicable to RVPA-4 to RVPA-11 were duly conducted in accordance with the CDM requirements prior to the start dates of the VPAs. At the time, these consultations were valid and fully complied with CDM procedures, additional consultations in 2023 addressed all identified gaps between the original CDM consultations and the stakeholder engagement requirements under GS4GG. RVPA-4 to RVPA-11 were submitted within two years of the 2023 grouped physical consultation meeting held on 05/04/2023. The Stakeholder Inclusivity Principle was fully upheld by the CME, ensuring that all affected, interested, and vulnerable stakeholders were informed, consulted, and given the opportunity to provide feedback throughout the consultation process. All stakeholders relevant to RVPA-4 to RVPA-11 were again invited in 2025 for physical meetings and feedback rounds and no negative comments have been received.
- As part of the standard performance review process, the VVB will independently confirm that each VPA satisfies all applicable GS4GG requirements prior to issuance of any VERs. The start date of crediting period of each VPA is after the VPA start date. The Demonstration of Real Outcomes Principle will also be fully honored by the CME. We commit to complete the site visits within the first two years of the crediting period, during the first verification scheduled for 2026.

2) Financial Dependence on VER Revenue

	<ul style="list-style-type: none"> Most of the projects in RVPA-4 to RVPA-11 are heavily reliant on carbon revenue, delayed payback periods make these projects financially unsustainable without access to carbon markets <p>3) Impact on Local Sustainable Development</p> <ul style="list-style-type: none"> These VPAs directly support South Africa's national energy transition goals, including the decentralization of clean energy generation, as outlined in the official communications from the President (25/07/2022) and Government of South Africa (23/01/2023). They align with the South African Carbon Tax Offset system's limited but critical eligible project scope, helping alleviate a supply bottleneck for eligible offsets in the domestic market. <p>4) No Alternative Pathway</p> <ul style="list-style-type: none"> Our PoA was the only viable framework for these specific project owners to access carbon finance, given the niche segment of the market and lack of other eligible offset programs locally. <p>5) Conformance with GS4GG Core Values</p> <ul style="list-style-type: none"> These projects fully meet the Safeguarding Principles & Requirements and make verifiable contributions to SDG 7, SDG 8, SDG 9 and SDG 13. Granting an exemption from the rule clarification would correct an inequitable outcome that unfairly restricts participation for project owners who have acted in good faith throughout the prolonged and necessary transition process. <p>The projects included into RVPA-4 to RVPA-11 are the microscale projects, that are dependent on carbon revenue. Many of these projects were developed by SMEs and independent power producers with narrow margins and limited cashflow. Without VER revenue, these operations struggle to break even. The projects in RVPA-4 to RVPA-11 are not only socially and environmentally impactful—they are financially fragile and urgently require market access to carbon offsets.</p>
Proposed resolution	<p>We kindly request a deviation from the rule requiring inclusion within one year of the regular VPA start date, allowing for the inclusion of VPAs RVPA-4 to RVPA-11 under our certified PoA GS11949, submitted within two years of the 2023 grouped physical meeting, and requiring a site visit by VVB within two years of the VPA's start date.</p> <p>We remain committed to transparency, fairness, and the long-term success of the GS4GG system and are ready to provide any additional documentation or clarifications required.</p>

	<p>The proposed resolution complies with the key principles and requirements</p> <ul style="list-style-type: none"> • Environmental integrity: GS VERs will not be overestimated as a result of the deviation, and conservativeness will be ensured. The deviation does not affect the estimation of the GS VERs, the relevant checks will be carried out by the VVB during the verification process. The deviation does not affect the Environmental integrity. Combustion of fossil fuels (mostly coal) at Eskom's power plants and hereby emissions of the harmful substances into the atmosphere, such as flue ash, oxides of sulphur and nitrogen will be reduced due to the implementation of each independent activity under the VPAs. • Contribution to the Sustainable Development Goals (SDGs): SDG contributions will not be compromised. The deviation does not negatively affect the estimation of the contribution to SDGs. In fact, in case the deviation is granted, the contribution to SDGs will increase for the entire PoA. • Safeguarding principles and requirements: Safeguarding principles and requirements will not be compromised. The deviation does not affect the Safeguarding principles assessment. The VPAs in question clearly demonstrate a direct contribution to sustainable development and fully conform to the Safeguarding Principles & Requirements. • Compliance with host country regulations: The host country regulations will not be compromised. The deviation does not conflict with the host country regulations. In fact, the host country is welcoming the renewable energy projects. The host country proposed in August 2024 that the carbon offset regulations be amended to increase the eligibility threshold for renewable energy projects to qualify for the allowance in respect of carbon offsets from 15 to 30 Megawatts. <p>Furthermore:</p> <ul style="list-style-type: none"> • Accuracy: The deviation does not affect the accuracy of the measurement and the monitoring plan. • Completeness and conservativeness: The deviation does not affect the application of the methodology, additionality, baseline determination and quantification of GHG emission reductions.
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	<p>Select the relevant area:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Project design <input type="checkbox"/> Local stakeholder consultation <input type="checkbox"/> Safeguarding principles <input type="checkbox"/> SDG assessment <input type="checkbox"/> Regulatory compliance <input type="checkbox"/> Additionality <input type="checkbox"/> Applicability of methodology

	<input type="checkbox"/> 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 tCO₂e</td><td>XYZ tCO₂e</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 ₂ e	XYZ tCO ₂ e		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
XYZ tCO ₂ e	XYZ tCO ₂ e						
	<input type="checkbox"/> any other matrix, please specify...						
Summary of the impact	The impact is only positive as described above						
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 <input type="checkbox"/> No <input checked="" type="checkbox"/> <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.)*
- VPA-DDs
 - Deviation Request Form
 - GS4GG Design Review feedback

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: <ul style="list-style-type: none"> - 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