



**Gold Standard<sup>®</sup>**  
for the Global Goals

TEMPLATE

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2021**

Version **5.0**

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A. **To be completed by Gold Standard**

## 1 | Decision

**1.1 | Date – 16/01/2025**

### **1.2 | Decision**

The deviation is not approved.

As per para 1.1.4 of Annex B of LUF Activity Requirement, a project that includes areas managed by smallholders and non-smallholders can conduct a combined certification. As per paragraph 3.1.4 (b) of Annex B of LUF Activity Requirements, the requirement of maintaining a buffer zone of 15 m on both sides of permanent or temporary water bodies is not applicable only for the smallholder areas. Exceptions for smallholder activities as stipulated in LUF Activity Requirements may be exercised only for smallholder areas in those activities that involve both smallholder and non-smallholder areas.

The total area bound by smallholder requirements should adhere to all the applicable conditions in Annex B of LUF Activity Requirements and the Rule Update dated 04/10/2021 "[Smallholder, small scale and microscale definitions and requirements for Land-Use and Forestry \(LUF\) projects](#)". It will have to be demonstrated that the smallholder areas which have exceptions do not exceed 16,000 tCO<sub>2</sub>e per year. Any

area managed by smallholders, beyond this cap, shall not be allowed to exercise the exceptions.

**1.3 | Is this decision applicable to other project activities under similar circumstances?**

Yes

- B. **To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation** (Submit deviation request form in Microsoft Word format)

## 2| Background information

Deviation Reference Number	DEV_784	
Date of decision	16/01/2025	
Precedent (YES/NO)	No	
Precedent details	-	
Date of submission	29/07/2024	
Project/PoA/VPA	<input type="checkbox"/> Project	ID – GSXXXX
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX

Project/PoA/VPA title	Nestlé & FNC tree planting/Reforestation Project in Colombia
Date of listing	To be listed
GS Standard version applicable	Land Use & Forests Activity Requirements Version 1.2.1/ Published April 2020
Date of transition to GS4GG (if applicable)	N/A
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A
Date of design certification/inclusion (if applicable)	N/A
Location of project/PoA/VPA	Colombia
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale
Gold Standard Impact Registry link of the project/PoA/VPA	N/A
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project
Title/subject of deviation	15 m Buffer zones exemption for small-holders within a large-scale project
Specify applicable rule/requirements/methodology , with exact paragraph reference and version number	Land Use & Forests Activity Requirements Version 1.2.1/ Published April 2020 - Principle 2: Safeguarding Principles & Requirements, paragraph 3.1.6: <i>The Project Developer shall maintain a buffer zone of 15 meters for water bodies on both sides of any permanent or temporary water bodies such as lakes, streams, rivers, wetlands, etc. Irrigation channels are excluded from this requirement. In these buffer zones: (a) All existing native trees shall be kept, AND (b) No fertilizer and pesticides shall be used, AND (c) No logging activities shall take place, AND (d) No heavy machinery shall be used, AND (e) No cropping is allowed, AND (f) In case trees are being planted, these need to be native tree species.</i>

Specify the monitoring period for which the request is valid (if applicable)	Start date 2022 End date 2052
Submitted by	<b>Contact person name:</b> <a href="#">Andrea Sabelli</a> / <a href="#">Laura Castañeda Gómez</a> <b>Email ID:</b> <a href="mailto:a.sabelli@southpole.com">a.sabelli@southpole.com</a> / <a href="mailto:l.castaneda@southpole.com">l.castaneda@southpole.com</a>
	<b>Organisation:</b> South Pole
	<b>Project participant:</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  If yes; <b>VVB name:</b> <b>VVB Staff name(s):</b>
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

### 3 | Deviation detail

#### 3.1 | Description of the deviation:

*\*Guidance\* Use the space below to describe the deviation and substantiate the reason for requesting deviation from applicable rules/requirements. Please include all relevant information in support of the request. You are requested to follow the principles for requesting deviations, given in the [Deviation Approval Procedure/ Design Change Requirements](#).*

##### 3.1.1 | Deviation detail (to be completed by Project developer):

This deviation request is submitted for the Project “Nestlé & FNC tree planting/Reforestation Project in Colombia” to be submitted to Gold Standard. It focuses on the fulfillment of the 15 m buffer zone requirement as part of principle 2 - safeguarding principles and requirements contained within the [Land Use & Forests Activity requirements, Version 1.2.1 \(April 2020\)](#).

This is a grouped Afforestation and reforestation (A/R) project, aimed to sequester carbon via the planting of trees in limited to no-shade (full-sun) coffee plantations as well as areas within or outside the coffee producing farms previously degraded by cattle and/or shifting agriculture (pastures, fallows and other crops). The project design includes the implementation of: Agroforestry systems, live fences, forestry plantations and protective plantations (focusing on native species and corresponding to 10% of the project area in high value conservation areas). Participating coffee producers and farmers are mostly **small-holders** (with 95% of current enrolled coffee farmers in **Gold Standard**®).

areas <3 Ha) with some being medium and large holders (minority). Yet, this project does not fulfill all the requirements to be defined as a small-holder project. By definition, a small-holder project is composed not only of farmers with project areas <3 Ha and low-incomes (point 2.1.1 from Rule Update: SmallHolder, small-scale and microscale definitions); but also by (point 2.1.2) a) being small-scale or micro-scale, and b) generate no more than 16,000 ton CO<sub>2</sub>e/yr. Nonetheless, this is a **large scale project** aiming to sequester ca. 64,000 ton CO<sub>2</sub>e/yr across ca. 12,000 Ha of farmland in three departments in Colombia (Risaralda, Valle del Cauca and Antioquia).

Large scale projects have as a requirement in point 3.1.6 within the Land Use & Forests Activity requirements, Version 1.2.1 (April 2020), Principle 2, Safeguarding principles and requirements, that *"the project developer shall maintain a buffer zone of 15 meters for water bodies on both sides of any permanent or temporary water bodies such as lakes, streams, rivers, wetlands, etc. Irrigation channels are excluded from this requirement. In these buffer zones: (a) All existing native trees shall be kept, AND (b) No fertilizer and pesticides shall be used, AND (c) No logging activities shall take place, AND (d) No heavy machinery shall be used, AND (e) No cropping is allowed, AND (f) In case trees are being planted, these need to be native tree species"*.

An exemption to this requirement is presented in Annex B of the guidelines, in which this 15 m buffer is **not required for small-holder and micro-scale projects** (point 3.1.4 - b). Alternatively, a combined certification can be sought (Annex B, point 1.1.4) but since this exemption is only applicable for small-scale and micro-scale projects, as the definition of small-holder farmers is inherently associated with small- and micro-scale projects.

Alternatives for this challenge were discussed with GS representatives in which a mixed certification was explored. However, the answer from the Gold Standard secretary regarding this specific case was that **"There is no provision for the exception situation you describe."** and that *"It is not possible to accommodate the situation as described"*. Also, the reply from the GS secretary confirmed that the combined certification option as proposed in Annex B, is applicable only to *"projects that are smallholders and microscale"*.

In light of this, we are requesting this methodology deviation in order for Gold Standard to acknowledge the particular circumstances of this project, aiming for large-scale action involving small-holder farmers.

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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### 3.2 | Assessment of the deviation:

*\*Guidance\* Use the space below to describe how the deviation complies with the requirements, and, where applicable, the accuracy, completeness and conservativeness is ensured. Please include all relevant information in support of the request.*

#### 3.2.1 | Deviation assessment (to be completed by Project developer):

Most of the project area is located within the Coffee Cultural Landscape (Paisaje Cultural Cafetero - PCC) a World Heritage Site, declared by the Scientific and Cultural Organization (UNESCO) on June 25, 2011<sup>12</sup>. This recognition implies a commitment for the protection and preservation of the cultural heritage, its biological diversity and environmental sustainability. The PCC is mainly characterized by the presence of **mostly small-holders spread across the landscape**, including 47 Colombian municipalities that share a unique social and cultural identity as well as an economic revenue model. The departments where the project is carried out is highly fragmented with the mean size of rural farms being 6.3 Ha for Valle del Cauca, 2.9 Ha for Risaralda and 8.2 Ha for Antioquia<sup>3</sup>. Of these departments, Valle del Cauca and Risaralda were recognized as part of the PCC, whereas Antioquia was not included due to political unwillingness during the declaration process<sup>4</sup>. Nevertheless, this department fulfills all the requirements to be included in the PCC.

An impactful **large-scale grouped project** as the one being currently proposed, could not be possible in this landscape under the Gold Standard requirements, particularly the 15 m buffer zone from water bodies, given the inherent nature of the social and economic structure of the target population of farmers (**small-holders**), in the target departments. Therefore, the deviation request proposed here, would allow for a nature-based solution to be implemented in this large heritage area thus allowing Colombian coffee growers and other farmers (e.g. cocoa, banana, cash crops, managed grasslands

<sup>1</sup> Velandia, C.A. 2017. The Coffee Cultural Landscape of Colombia. Journal of World Heritage Studies, Special Issue, ISSN 2189-4728

<sup>2</sup> <https://whc.unesco.org/en/list/1121/documents/>

<sup>3</sup> Cortés C., Fernández A., Lagos L., Maluendas A., Manrique J., Ríos M., Rubiano C., Hincapié J. 2020. Distribución de la propiedad rural. Colombia 2016. Bogotá: UPRA. Available at: [https://www.upra.gov.co/es-co/Publicaciones/Análisis\\_Dist\\_Prop\\_Rural\\_2016.pdf](https://www.upra.gov.co/es-co/Publicaciones/Análisis_Dist_Prop_Rural_2016.pdf)

<sup>4</sup> Osorio, 2024. Antioquia, por fuera del Paisaje Cultural Cafetero. Available at <https://www.elcolombiano.com/opinion/columnistas/antioquia-por-fuera-del-paisaje-cultural-cafetero-CD11125315>

for livestock) in the project area to establish more resilient agroecosystems and benefit from the resultant ecosystem services and additional economic revenues.

The fulfillment of the requirements in point 3.1.6 within the Land Use & Forests Activity requirements, Version 1.2.1 (April 2020), Principle 2, regarding the establishment of the 15 m buffer zones are assessed below:

*"(a) All existing native trees shall be kept,*

The smallholder farms where most of the project is being developed already have coffee plantations or agricultural activities established in the majority of the land, even if there are water bodies close-by. Native vegetation present in these farms has been cleared as part of the landscape transformation of the project area but the "no deforestation" eligibility criteria 10 years prior the start of the project activities is assessed on a case-by-case basis to guarantee its fulfillment. In cases where native trees are established near water bodies within the farms, these will be preserved.

*(b) No fertilizer and pesticides shall be used,*

The traditional and current management practices of small-holder coffee farms involve fertilization practices that are now being based on soil analysis in order to minimize nutrient losses to water bodies as well as manual fertilizer application. In case where no soil analysis is performed, two different fertilizer formulations were created in order to more efficiently nurture coffee crops, maintaining yield and reduce fertilizer losses<sup>5</sup>. Also, pests are managed via integrated pest management plans including either chemical or biological products applied locally in the production area, moreover the foliar fertilizers are not applied in coffee crops. Based on this, the typical PCC management plans are not aligned with the GS requirements but are crucial for the development of the coffee crops in the challenging conditions of this cultural landscape. For other farmers and agricultural activities, the project implementer will ensure that fertilizers are applied in a similar manner (locally and based on soil analysis to minimize losses)

*(c) No logging activities shall take place,*

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<sup>5</sup> <https://federaciondecafeteros.org/wp/servicios/scientific-research-and-technological-development/?lang=en#:~:text=Cenicafe%20desarrolla%20dos%20tipos%20de%20fertilizantes,y%20que%20son%20de%20composici%C3%B3n%20equilibrada>.



The project activities will adhere to this requirement unless coffee crop renovation for small-holder farms that already have established coffee plantations needs to occur in areas that are meant to be within the 15 m zone. A small proportion of 2022-2023 cohort farmers have established live fences and forestry plantations (including *Eucalyptus* sp.), these trees will be eventually logged. However, the project implementer will ensure that future enrolled small-holder farmers won't establish non-native species in their land to avoid logging activities in areas that should be buffer zones.

*(d) No heavy machinery shall be used,*

Coffee plantations in Colombia do not use heavy machinery. Harvesting and crop management is mainly done manually as the hillside and mountain geographies where coffee crops are established do not allow for the use of heavy machinery. Similarly, other crops and livestock management activities are done manually due to the challenging geographical conditions of the area.

*(e) No cropping is allowed,*

As the 15 m buffer is challenging to achieve in smallholder farms of <3Ha, most of the farm's area is already planted with coffee crops or other farming activities.

*(f) In case trees are being planted, these need to be native tree species"*

Farmers from 2022 and 2023 cohorts may have some non-native species established within the farm area. However, for farms with <3 Ha, plantations with non-native species will not be established and only protective plantations will be proposed for these small-holder farms.

Although the PCC is mainly focused on coffee producers, this project will also involve other cropping and productive systems within the project area

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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### 3.3 | Impact of the deviation:

*\*Guidance\* Use the space below to describe the impact of the deviation on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. Please substantiate the impact assessment with relevant and verifiable data/information.*

3.3.1 | Impact assessment (to be completed by Project developer):

The deviation requested here, for smallholders to not fulfill the 15 m buffer zone from water bodies due to the small size of their properties (<3 Ha) in this large scale project would have some impacts on the elements mentioned above, as follows:

- Project design: The project has been designed without considering the 15 m buffer zone requirement given the particular combination of conditions of this project that make it non-applicable to the available exemptions or requirements for a combined certification.
- Safeguarding principles: This deviation impacts specifically the safeguarding principle related with the 15 m buffer zone to be kept in the project areas. This deviation request will help fulfill the safeguarding principle that guarantees that there will be no negative impacts on vulnerable or marginalized social groups (small-holder, low-income farmers) and no negative economic consequences for these farmers as it will allow for small-holders to be included in the project and access the produced economic benefits.
- SDG assessment: Allowing smallholders participation in this project without fulfilling the 15 m buffer zone required for a large-scale project through the approval of this deviation request would facilitate the significant contribution to the proposed SDGs of the project: Climate action via the planting of trees in this mountainous agricultural landscape, currently estimated at 1,945,836tCO<sub>2</sub>e total; and Life on land, via the land restoration of agricultural land with the establishment of shade cover estimated at 12,000 ha.
- Emissions reductions: ER would be calculated for systems implemented within these buffer zones as this represents a good portion of the productive area of farmers enrolled in the project.
- Monitoring frequency: No impact
- Data quality: No impact
- Potential risks: Farmers would be economically impacted in case that the buffer area needs to be implemented as they would lose a good portion of their productive area to this requirement, making the project not economically beneficial for them

3.3.2 | VVB opinion (to be completed by VVB, if applicable ):

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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### 3.4 | Documents:

*\*Guidance\* List of documents provided (note that once a decision has been made by Gold Standard, this deviation form along with supporting documents will be made public on the Gold Standard website. If any of the supporting documents are confidential, please indicate here to ensure they are omitted.)*

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> </ul> Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption