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-230
Date of decision	03/12/2025
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

Thank you for submitting the deviation request.

A deviation is not warranted in this case as the resolution of the referred FAR from the preliminary check is not contingent on this deviation.

A project activity is not allowed to plant species with high risk of invasive behaviour. With reference to P.9.12.1 of the Safeguarding Principles & Requirements, an activity shall demonstrate that new alien species are not introduced which are not already established in the country or region of the activity. The PD/CME shall demonstrate with appropriate scientific support, which may include peer reviewed articles and/or expert opinion, that the species being considered for the plantation does not have a high risk of invasive behaviour.

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

Adherence to the safeguards as detailed in P.9.12.1 and P.9.12.2 shall be demonstrated by the PD/CME during the design certification process

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

VVB shall assess adherence of the design to P.9.12.1 and P.9.12.2 of the safeguarding P&R during the design certification process

…

4.2.4 | Directions for the Gold Standard, if applicable

NA

4.3 | Applicability to other activities

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

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

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

5| Deviation Request Details

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

5.1 | Submitted by

☒ Project developer
☐ CME
☐ VVB
☐ Other (specify…)

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

Item	Information
Name[3] :	Camilla Bianchi
Email ID[4] :	camilla.bianchi@renco.it
Organisation:[5]:	RENCO 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	GS12679		
Host country(ies)	Republic of the Congo		
Project Title	Ja.Ca.Mbé Project - The Carbon Garden of Mbé		
Registry link	https://registry.goldstandard.org/projects/details/5315		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below *Insert text here*		

Certification Status and corresponding date of latest status	☐ Listed	☐ Certified design	☐ Certified project	☒ Other Preliminary review
				14/03/2025

[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

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 Document: Preliminary Review Report Section: A.1. Purpose and general description of project Findings: CL1 converted to FAR 9 Date: Review Round 2; 12 Mar 2025 As part of the Preliminary Review, SustainCert had kept a conditional requirement for listing the project subject to approval of the deviation request from the Gold Standard. The statement is below: *'As for FAR 9 from SustainCert: Before the PD engages the VVB for Validation, the PD shall seek a deviation request from the Gold Standard as per the process cited in the next paragraph. The PD shall put arguments to demonstrate how they are in compliance with P.9.12.1 and P.9.12.2 of the SAFEGUARDING PRINCIPLES & REQUIREMENTS v.2.1 (https://globalgoals.goldstandard.org/103-par-safeguarding-principles-requirements/). It is up to the Gold Standard to decide whether they shall allow*		

	plantation of a species as invasive as Acacia Mangium in Congo. In SustainCERT's opinion, this project should not be listed as it poses a high risk of doing harm to the natural environment that offsets gains that might have had in restoring nutrient cycle through Soil Organic Matter and Carbon Sequestration. Only once an approved Deviation Request is received by the project, can it go forward with the Validation. Otherwise, the project cannot be listed under the Gold Standard and the status should be revoked.' P.9.12.1 |The project under no circumstances shall introduce any alien species (not currently established in the country or region of the project) into new environments. Notwithstanding the above, the project shall not deliberately introduce any alien species with a high risk of invasive behaviour regardless of whether such introductions are permitted under the existing regulatory framework. The project shall implement measures to avoid the potential for accidental or unintended introductions including the transportation of substrates and vectors (such as soil, ballast, and plant materials) that may harbour alien species. P.9.12.2 |Where alien species are already established in the country or region of the proposed project, the project developer shall exercise diligence in not spreading them into areas in which they have not already been established. As practicable, the project developer should take measures to eradicate such species from the natural habitats over which they have management control.

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	Safeguarding Principles and Requirements
	Version	V2.1
	Paragraph	P.9.12.1/P.9.12.2

6.2 | Description of the deviation

Title	Proof of conformity with P.9.12.1, plan to conform to P.9.12.2	
	☐ Temporary	☒ Permanent

Confirm the nature of changes related to deviation	(e.g. not expected to occur beyond one monitoring period)	(e.g. deviation from requirements prior to submission for certification)
	The changes need to be applied to the project to ensure absolute conformity with P.9.12.2 need to be diligently applied during the entirety of the crediting period	
Relevant monitoring period, if applicable	Start date	N/A - The DR is applicable to the entire crediting period and not to a specific monitoring period
	End date	N/A - The DR is applicable to the entire crediting period and not to a specific monitoring period
Summarise the changes	This section explains how the project already complies or will comply with Safeguarding Principles P.9.12.1 and P.9.12.2 in relation to the use of *Acacia mangium*. For P.9.12.1, the project shows that it is already in compliance because *A. mangium* is not being newly introduced but has long been established in the Republic of Congo, including the Pool District and in the vicinity of the project area itself. It is also true that it continues to be planted today and will be planted in the future, not only through carbon projects under recognised standards, but also through national and international programmes aimed at rural development, increasing the supply of fuelwood, and reducing pressure on native species. Many of these programmes are led by the Government of Congo or by reputable organisations such as FAO. For P.9.12.2, the project describes the changes and measures it will adopt so that compliance is ensured, including modifications to project design and management that will prevent spread during the crediting period. **P.9.12.1 – Introduction of invasive alien species** The justification for compliance with P.9.12.1 can be organised around three main points: First, Acacia is already present in the country, the region and the project area. *Acacia mangium* has been planted in the Republic of Congo for more than four decades [2][3][4][5]. Documented trials show its use on sandy ferrallitic soils to rehabilitate poor sites and to sustain eucalyptus plantations [2], while growth and productivity studies confirm that it has been integrated into large-scale plantation systems [3][4]. Long-term observations indicate that Acacia rotations have improved soil organic matter quality and carbon pools [1], reinforcing its role as a managed plantation species rather than an invasive one. In the Pool Department (project region) and adjacent landscapes, the species forms part of national and internationally supported programmes, including ProNAR, PREFOREST and PROREP, as well as Makala/CAP Makala trials and the Government's Sustainable Land Use Programme (PUDT) [11][12][13][14][15]. Regionally, FRM-led A/R projects on the Batéké Plateaus (e.g., VCS 2319; OKA 2) and related initiatives (Bateké Carbon Sink, COFOR, ECO ZAMBA) include Acacia species within	

approved plantings [6][7][8]. As part of projects certified or undergoing certification by VERRA in the Republic of Congo, *A. mangium* appears on approved species lists [9][10]. Taken together, these multiple sources confirm that the project is not introducing a new alien species but operating within an existing, multi-programme planting context that already includes the project's vicinity. The following maps shows carbon projects being actively developed in the area, which use acacia in their plantations:

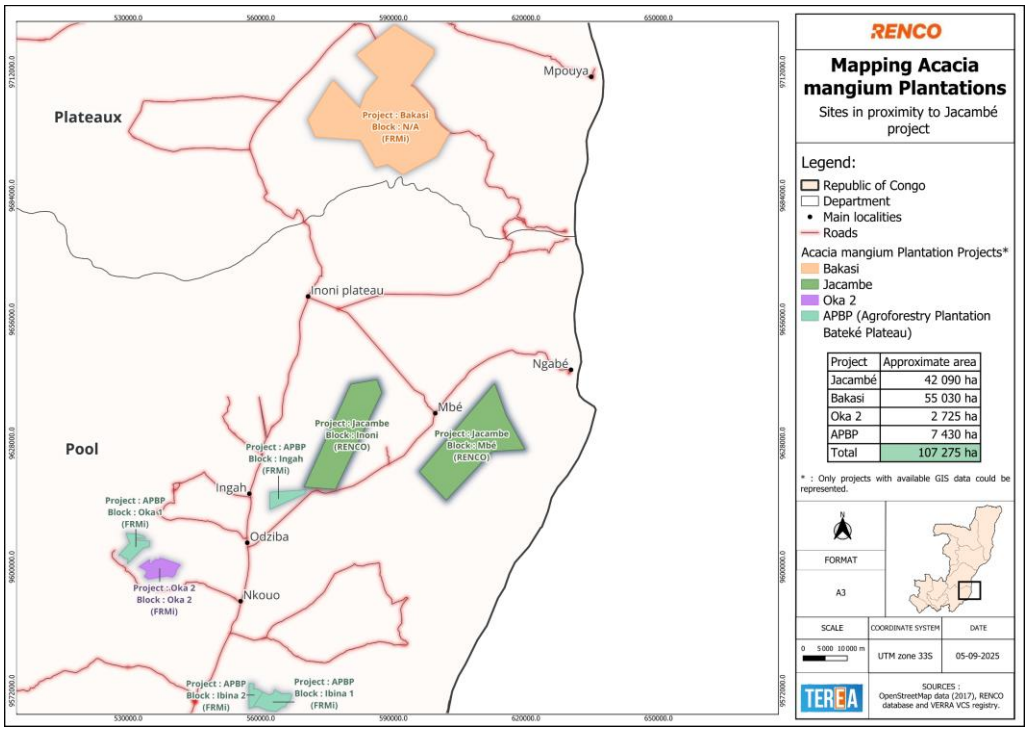

Figure 1 - Carbon projects using Acacia M. in the area of the Ja.Ca.Mbé project.

It is important to notice that the project APBP is in the immediate vicinity of the Ja.Ca.Mbé project area.
It is also of great importance to mention that Acacia Mangium, is being planted in other recent GS projects in the Congo basin (in the DRC, similar edaphoclimatic, ecological, and social outlooks), hence a precedence already exists:

a. GS ID 12214: An afforestation project located in the Democratic Republic of Congo, North-East of Kenge, has received GS Certified Design status very recently (Mar 2025) and plants amongst other trees species, Acacia mangium amongst the other exotic and endemic species. https://registry.goldstandard.org/projects/details/4372
b. GS ID 12447: An afforestation project located in the south of Democratic Republic of Congo, in the town of Idiofa in Kwilu province, has received GS Listed status (Aug 2024) and plants amongst other trees species, Acacia mangium amongst the 25% of the Acacia species in the planting mix. https://registry.goldstandard.org/projects/details/4607

Second, the evidence of invasiveness in Congo is inconclusive, with the country's government and local expert opinions claiming no proof of such

	behaviour within the country. Detailed studies support this position. Koutika et al. (2019) [1] analysed soil organic matter quality in Acacia and Eucalyptus rotations and reported improvements in soil carbon pools, with no indication of invasive behaviour. Bernhard-Reversat (1993) [2] examined litter and organic matter dynamics in Acacia plantations on sandy ferrallitic soils in Congo, noting nutrient cycling benefits without evidence of uncontrolled regeneration beyond planted stands. Epron et al. (2013) [3] partitioned net primary production in Acacia and Eucalyptus systems across tropical environments, including Congo, and found differences in biomass allocation but no signs of spread into surrounding ecosystems. Bouillet et al. (2013) [4] tracked tree growth in Acacia and mixed plantations across Brazil and Congo, again reporting productive yields within managed compartments rather than invasive expansion. Reviews of afforestation experience in the Congolese coastal plains emphasise site selection and management lessons rather than invasion risk [5]. In particular, Koutika (2019) [5] shows that *Acacia mangium*, when integrated into savannah environments, improves soil phosphorus availability and enhances the fertility of Arenosols. The emphasis of this work is on how Acacia can be managed to rehabilitate poor soils and complement eucalyptus production, rather than any uncontrolled spread of the species. The lessons from these afforestation experiences therefore highlight the value of appropriate site choice, stand management and species combination, while providing no evidence of invasive behaviour in the Congolese context. In parallel, the programme documents and species list that underpin ongoing national and international planting (ProNAR, PREFOREST, PROREP; VERRA-approved species lists) implicitly reflect regulatory and technical vetting of *A. mangium* for use in Congo [9][10][11][12][13]. In addition, this conclusion is reinforced by the findings of Jean-Noël Marien, a recognised country specialist in Congolese forestry and land management, whose detailed review annexed to this Deviation Request underlines that the invasive potential of *Acacia mangium* in Congo remains largely theoretical and has not been confirmed by field evidence: (i) "Invasive species: The invasive potential of *Acacia mangium* in Congo" (Jean-Noël MARIEN for TEREA, 2025) His expertise demonstrates that while the species can germinate outside planted plots, local ecological and socio-economic conditions, including annual fires and heavy pressure on woody biomass, prevent its spread and persistence. Further reinforcement comes from two official documents transmitted by the Ministry of Forest Economy in response to RENCO's clarification request: (ii) the Ministry's letter dated 12 September 2025, and (iii) the bibliographic review of *A. mangium* enclosed with that letter. Both confirm that although *A. mangium* has been recognised as invasive in other tropical regions, no spontaneous invasion has been observed in the Republic of Congo despite more than 70 years of planting experience. Together, these national-level assessments provide authoritative confirmation that the invasive status of *A. mangium* in Congo remains unproven and context-specific.

On this basis, and given the absence of records in national biodiversity assessments, the current status in Congo remains inconclusive, rather than demonstrably invasive.

Third, the project will implement strict measures to prevent accidental or unintended introductions of any biological agent. Standard biosecurity and phytosanitary protocols will be applied throughout the project cycle. Nursery operations will use vetted seed sources and hygiene practices described in the nursery management plan. Transport and planting operations will be controlled to avoid contamination with other species, pests or diseases; machinery hygiene will be enforced; and fire management practices will be in place to reduce post-disturbance recruitment – all as per forestry management plan and operational SOP's. Experience from FRM project documentation and the operational frameworks of national and FAO programmes demonstrate that robust governance and technical oversight are already in place in Congo to manage species like Acacia. By situating project safeguards within this broader institutional and technical framework, and in combination with the documented, multi-programme presence of *A. mangium* in Congo, these preventive measures confirm that P.9.12.1, aimed at introductions of invasive alien species, does not apply in this context.

In conclusion, *Acacia mangium* is already present and currently being disseminated in the Republic of Congo, in the project region and in adjacent zones to the project area: The project does not introduce an alien species into a new environment. This species has demonstrated significant value in agroforestry, reforestation, and timber production in the country. Its presence is particularly valued for:

- Growing in poor soils;
- Restoring degraded lands;
- Fixing nitrogen to improve soil fertility;
- Providing communities with fuelwood resources, taking the strain from native trees and dense forest remnants, contributing for biodiversity conservation and socioeconomic benefits.

The documented introduction of *Acacia mangium* in the Republic of Congo was undertaken to rehabilitate poor soils and sustain the productivity of eucalypt plantations [2][3][4][5]. Therefore, the JACA MBÉ project is utilising an already established species that has been present for the past four decades, rather than introducing a new alien species.

[1] Koutika, LS., Ngoyi, S., Cafiero, L. et al. Soil organic matter quality along rotations in acacia and eucalypt plantations in the Congolese coastal plains. For. Ecosyst. 6, 39 (2019). https://doi.org/10.1186/s40663-019-0197-8
[2] Bernhard-Reversat F (1993) Dynamics of litter and organic matter at the soil-litter interface of fast-growing tree plantations on sandy ferrallitic soils (Congo). Acta Ecol 14(2):179–195
[3] Epron D, Nouvellon Y, Mareschal L, Moreira RM, Koutika LS, Geneste B, Delgado-Rojas JS, Laclau JP, Sola G, Gonçalves JLM, Bouillet JP (2013) Partitioning of net primary production in Eucalyptus and Acacia stands and in mixed-species plantations: two case-studies in contrasting tropical environments. For Ecol Manag 301:102–111
[4] Bouillet JP, Laclau JP, Gonçalves JLM, Voigtlaender M, Gava JL, Leite FP, Hakamada R, Mareschal L, Mabiala A, Tardy F, Levillain J, Deleporte P, Epron D, Nouvellon Y (2013) Eucalyptus

and Acacia tree growth over entire rotation in single- and mixed-species plantations across five sites in Brazil and Congo. For Ecol Manag 301:89–101
[5] Koutika LS (2019) Afforesting tropical savannas with Acacia mangium and eucalyptus improves soil P availability in Arenosols of the Congolese coastal plains. Geoderma Reg 16:e00207.
[6] https://www.atibt.org/en/announcements/30/total-and-frmi-launch-40-000-hectares-forestplantation-in-the-republic-of-congo
[7] https://totalenergies.com/media/news/press-releases/total-and-frm-to-plant-forest-in-congo
[8] https://frm.group/fr/plantations
[9] FRM (2022) Project Design Document – OKA 2 Project, Republic of Congo. VCS Version 1.1, VERRA. Forestry Resource Management (FRM), République du Congo, 140 p.
[10] FRM (2022) Project Design Document - Agroforestry Plantation Bateke Plateau, Republic of Congo. VCS Version 3.3, VERRA. Forestry Resource Management (FRM), République du Congo, 147 p.
[11] https://www.mdpi.com/2071-1050/14/21/14624
[12] https://www.fao.org/wood-energy/search/detail/en/c/1642162/
[13] https://openknowledge.fao.org/server/api/core/bitstreams/931d71eb-fe71-4bc2-96ff-bce00b46af0d/content
[14] http://makala.cirad.fr/le_projet_makala
[15] https://www.cirad.fr/en/worldwide/cirad-worldwide/projects/pudt-congo-project

P.9.12.2 – Containment and control

In line with P.9.12.2, the project recognises its responsibility to prevent any further uncontrolled spread of *Acacia mangium* and sets out a verifiable management system based on prevention, containment, eradication, and documentation.

The containment design comprises three complementary zones. First, an internal buffer strip (Control Zone 1) located entirely inside the project boundary is managed by the project workforce through alternating shallow disturbance and vegetation maintenance to suppress seedling establishment, supported by a mineral-soil firebreak on the inner edge. Second, a precautionary monitoring belt (Control Zone 2) lies outside the formal boundary; the project will secure and maintain all required authorisations and community agreements to ensure access for surveillance and treatment. Third, forest patch buffers (Control Zone 3) around internal natural remnants are enriched with fast-closing native canopy and inspected for early removals. Across all zones, the project team retains primary responsibility; farmers may participate under paid micro-contracts, but their role is complementary rather than determinative.

The project will implement scheduled patrols in Zones 1 and 2, with intensified checks in high-risk micro-habitats (road verges, paths, waterways, and recently burned patches). Monitoring protocols will be developed in partnership with the *Institut pour la Recherche Forestière* (IRF), in Brazzaville, contributing to further the knowledge in the country in regards to biological control and containment. All detections and treatments will be geo-referenced (coordinates, photographs, operator, method, date) and consolidated into the annual monitoring report for the Gold Standard. The description of these activities, responsibilities, and data workflows will be incorporated in the PDD, the Forest Management Plan, and the relevant SOPs.

	The project will eliminate any individuals detected outside authorised compartments immediately as identified in all the zones. In no case it will be allowed to reach reproductive maturity. Seedlings and saplings (< 2 m) will be uprooted and removed. In the unlikely event that a plant grows taller than 2m, it will be eliminated according to the eradication protocol (e.g., bark removal, if necessary microdosing herbicide directly on the stump with a syringe – environmental impact negligible). Follow-up checks during 2 years minimum will confirm absence of regrowth. Each action will be recorded for audit. Farmer contracts in Zones 1–2 will explicitly include these tasks (with compensation for verified removals), whereas eradication in Zone 3 remains exclusively under the project team. Through these project-controlled measures (described in detail elsewhere in this deviation request and to be codified in the PDD, Forest Management Plan and SOPs) the proponent demonstrates practical compliance with P.9.12.2 during operations.
Reason for deviation	In relation to P.9.12.1, the project wishes to highlight three key points. First, as documented throughout this request, the evidence regarding the invasive nature of *Acacia mangium* in the Republic of Congo remains inconclusive. The available literature, including local expert assessments, does not demonstrate that the species is invasive under Congolese ecological conditions. Second, Acacia mangium is not a new introduction. It has already been established in the country for more than four decades, is planted in the region of the project, and is currently used in several programmes. Notably, projects led by the Government, FAO, CIRAD, and private operators have integrated Acacia mangium into large-scale initiatives such as ProNAR, PREFOREST, PROREP, and Makala. There is also evidence of nearby plantations in the immediate vicinity of the project area. Third, the species is planted in both carbon and non-carbon projects across the country, including those backed by internationally recognised organisations, and in districts such as Pool where this project is located. These facts demonstrate that the project is not introducing a high-risk alien species into a new environment, as defined by P.9.12.1. On this basis, the project contends that the restriction under P.9.12.1 does not apply in this case. In relation to P.9.12.2, the project acknowledges that although Acacia mangium is already introduced and established in the country, region, and project area, its management must be diligent to prevent further spread. For this reason, the project commits to implementing a robust system of containment and eradication during its operational lifetime. These measures are described in detail in the Proposed Resolution section, and include internal project teams, contracted farmer engagement, clearly defined control zones, systematic surveillance, and active eradication before reproductive maturity. Through these combined measures, the project demonstrates compliance with P.9.12.2, by ensuring that Acacia mangium will not spread into areas where it is not already established and by taking practicable steps to progressively reduce its presence outside authorised planting areas.
Proposed resolution	The project will implement management practices to ensure effective containment of *Acacia mangium* within the project area. This species mainly spreads through seed dispersal, with most seeds concentrated beneath the

	canopy, and plants capable of producing seeds from as early as two years of age. While available evidence from the Republic of Congo indicates that the invasive potential of *A. mangium* remains inconclusive, the project, as additional and prudential safeguard, put in place measures to contain any invasive behaviour. Accordingly, a comprehensive, technically robust, and verifiable system of prevention, monitoring, and eradication will be put in place. This system is tailored to the socio-ecological realities of the Mbé Plateau, where shifting cultivation and recurrent fire shape land-use dynamics, and ensures that all control responsibilities rest with the project, without burdening subsistence farmers whose priority is their own livelihoods. The cornerstone of this system will be the establishment of a project workforce with explicit responsibilities for containment and eradication. This workforce may be composed of individuals already engaged by the project for planting and silvicultural operations, supplemented where necessary by personnel recruited specifically for this purpose. Containment and eradication will form part of their contractual duties, carried out under the supervision of the project's forestry management staff. Alongside this internal capacity, the project will also engage farmers under paid agreements to establish crop fields along selected sections of the boundary. Cultivation of these fields will create soil disturbance and remove seedlings as part of normal farming activities. However, due to the shifting nature of agriculture and the limited continuity of cultivation, the project recognises that this contribution will be supportive rather than sufficient to secure the perimeter. Farmers will therefore play a complementary role and will be directly compensated for their efforts, while the project's own team remains the primary line of defence. The containment design is structured around three zones, which together create a multilayered barrier to uncontrolled spread. These zones are shown in the following map and described below in technical detail:

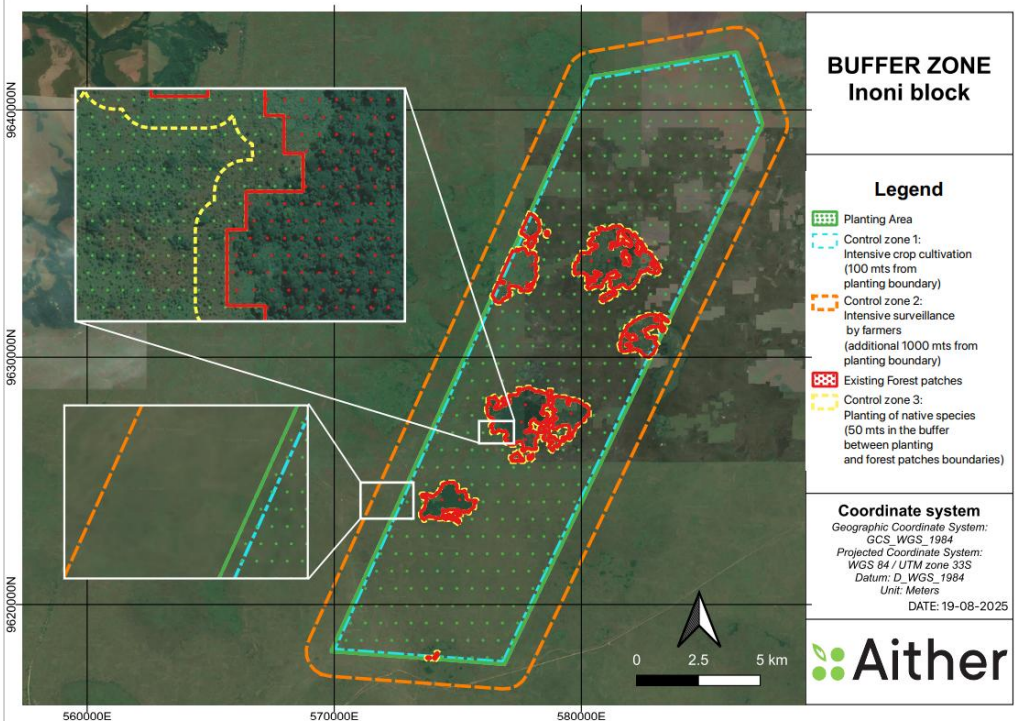

Figure 2- the 3 types of containment zones in one of the planting blocks of the project.

Control Zone 1 – Internal Buffer Strip (100 m): This strip runs immediately inside the plantation boundary, with an operational width of approximately 100 metres. Its function is to intercept and neutralise any *Acacia mangium* seeds dispersed from plantation edges by maintaining recurrent disturbance and unfavourable conditions for establishment. Management of this strip will rely on scalable techniques suitable for large areas, such as alternating shallow tillage in some segments to disrupt the topsoil and destroy germinating seedlings, and in other segments maintaining a low and continuous vegetative cover to limit light availability for acacia sprouts. In parallel, a cleared firebreak of mineral soil will be maintained along the inner edge, designed to prevent the spread of surface fires into the plantation and to minimise acacia regeneration after fire events. By alternating areas and activities, the project can combine disturbance with vegetation management in a way that is technically effective and compatible with the landscape. These practices are designed to be implemented at scale by the project workforce using simple, repeatable methods appropriate to the landscape conditions. Where feasible, short-term cropping by farmers may be introduced under paid micro-contracts, with the project preparing the fields in advance to avoid the use of fire by farmers. This arrangement will provide additional disturbance during cultivation cycles while reducing fire risk. Operations will be scheduled at least twice annually—at the end of the dry season and after the first rains—with supplementary passes following fire or mass seeding events.

Control Zone 2 – Precautionary Monitoring Belt (1,000 m): Extending outward from the plantation boundary, this zone is dedicated to surveillance and rapid response. Importantly, this belt remains outside of the formal project boundary, and the project will be responsible for securing and

maintaining all necessary authorizations and agreements to ensure continued access and the ability to execute biological containment and control activities here. The project team will patrol the belt on a scheduled basis, focusing inspections on high-risk habitats such as roadsides, paths, streams, and recently burned areas. Farmers cultivating plots within this belt may report or remove seedlings they encounter, with payments made for verified contributions. This voluntary involvement will provide additional vigilance, but the project team remains responsible for full coverage of the belt. All detections and treatments will be logged in the geospatial monitoring system, with coordinates, photographs, method, and operator ID.

Control Zone 3 – Forest Patch Buffers (≥ 50 m): Within plantation blocks, areas of remnant natural forest will be surrounded by protective buffers of at least 50 metres. These strips will be enriched with fast-growing native canopy species to close the canopy rapidly and reduce light penetration at the forest edge, thereby creating conditions that are unfavourable for *Acacia mangium* establishment. The project's containment workforce will inspect these buffers annually at the end of the rainy season, and also following any disturbance such as fire, stormfall, or logging damage. Seedlings under two metres will be uprooted, while taller plants eliminated according to the eradication protocol. Farmers are not expected to intervene in these zones, which remain under full project management.

To complement the design of the three containment zones, the project will establish annual monitoring and reporting of areas bordering the plantation in Control Zones 1 and 2 (currently estimated at ~1,400 ha and ~14,000 ha; final figures to be confirmed by GIS). A robust protocol will be applied to assess any possible spread of *Acacia mangium* beyond the perimeter and to define corrective measures. This protocol will be developed in partnership with the *Institut pour la Recherche Forestière* (IRF), a national research centre based in Brazzaville. Monitoring will function at two levels:

(i) systematic patrols and inspections carried out by project teams, and

(ii) contributions from contracted farmers around the perimeters and in external plots, who will be compensated for verified reports or removals.

This dual mechanism ensures that surveillance is both professional and participatory, while overall responsibility for effectiveness remains with the project. For Control Zone 2, which lies outside the project boundary, the project will secure and maintain all required authorizations and agreements to guarantee access and enforcement capacity. The description of these monitoring activities will be incorporated in the PDD, the Forest Management Plan and the relevant SOPs, and results will be reported annually to the Gold Standard.

Complementary to surveillance, the project will apply active control measures to eliminate any individual observed outside the perimeter before reaching reproductive maturity (two years of age). No tree should reach more than 2m tall. In the unlikely case of, protocol will define exactly what should be done to exterminate those trees and to deal with potential

	germination (specific eradication protocol). Plants less than 2 m tall will be uprooted, while taller plants will be eliminated according to the eradication protocol. All cut plants will be followed up to confirm the absence of regrowth. These measures will be formally included in the contracts of farmers in Control Zones 1 and 2, while eradication in Control Zone 3 will be carried out exclusively by the project team. Each destruction action will be documented, with procedures described in the PDD, the Forest Management Plan and the SOPs, and integrated into the annual monitoring report to the Gold Standard. In conclusion, the integrated approach applied across the three zones—reinforced by structured monitoring and active eradication—combines mechanical disturbance, systematic patrols, and ecological enrichment. Together, these measures prevent the spread of *Acacia mangium* beyond authorised planting areas and ensure full conformity with the requirements of P.9.12.1 and P.9.12.2.
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)* Annual emission reduction/removal before applying deviation: *XYZ* tCO_2e Annual emission reduction/ removal after applying deviation: *XYZ* tCO_2e ☐ any other matrix, please specify…
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? *VVB opinion shall be included, where required by the requirements under 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.*) Updated PPD,

Document 1: *"Invasive species : The invasive potential of Acacia mangium in Congo" (Jean-Noël MARIEN for TEREA, 2025)*

Document 2: Jean-Noël MARIEN's resume

Document 3: Olivier MONTEUUIS's resume

Document 4 - the Ministry's letter dated 12 September 2025, accompaning the related report.

Document 5 - Ministry of Forest Economy Report (Sept 2025) — host-country literature review on A. mangium invasiveness and the bibliographic review of A. mangium.

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