

**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**

The Gold Standard Foundation  
International Environment House 2  
Chemin de Balxert 7-9  
1219 Châtelaine Geneva, Switzerland  
Tel +41 22 788 70 80  
Email [help@goldstandard.org](mailto:help@goldstandard.org)

---

## 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](mailto: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.....	8
6.3   VVB information.....	9
6.4   VVB's assessment .....	9
6.5   Documents: .....	10

## 4| Decision summary

*To be completed by Gold Standard*

### 4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-244
Date of decision	29/10/2025
Decision	<input type="checkbox"/> <b>Approved</b> [No precondition to apply the deviation decision] <input checked="" type="checkbox"/> <b>Conditionally approved</b> [Decision is subject to compliance with the precondition defined below] <input type="checkbox"/> <b>Not approved</b> [reason for rejection is provided in decision summary]

### 4.2 | Decision

#### 4.2.1 | Decision Summary

The Request is Conditionally approved.

The project developer is permitted to use the grid emission factor (EF) from IFI data for default grid factor 2021 with the following conditions:

1. The applied EF may be used for baseline emissions calculation; however, it must not be treated as an ex-ante value for the entire project crediting period. Instead, the project developer must review the availability of updated grid data annually. If newer data or emission factors become available (from government reports, IRENA/UNFCCC databases, or other credible sources), the project developer is required to apply these updated values from the subsequent verification onward.
2. The VVB shall ensure that the project developer has updated the grid emission factor (EF) in each verification cycle. If no updated EF is available, the project developer must provide credible reasoning for continuing to use the previous emission factor, including evidence of attempts to obtain more recent data. VVB shall ensure full compliance with the reasoning provided.

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

The project developer shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the project developer. The project developer shall comply with all other applicable standard requirements unless specifically mentioned in the deviation decision. The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the project document.

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

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

4.2.4 | Directions for the Gold Standard, if applicable

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

4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances? <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does this decision set a precedent for future projects with similar circumstances? <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Precedent details (if applicable to other activities)	
<hr/>	

<sup>1</sup> 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.

<sup>2</sup> 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 <sup>3</sup> :	Juno Carbon Investment & Environmental Technology (Beijing) Co., Ltd.
Email ID <sup>4</sup> :	xuehuimei@junocapital.cn
Organisation: <sup>5</sup> :	Juno Carbon Investment & Environmental Technology (Beijing) Co., 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 checked="" type="checkbox"/> Project activity	<input type="checkbox"/> PoA GSXXXX	<input type="checkbox"/> VPA
GS ID	GS12777	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Kazakhstan		
Project Title	Jasil Jel Energy 15MW Wind Project		
Registry link	<a href="https://registry.goldstandard.org/projects/details/4666">https://registry.goldstandard.org/projects/details/4666</a>		
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	<input checked="" type="checkbox"/> Listed	<input type="checkbox"/> Certified design	<input type="checkbox"/> Certified project <input type="checkbox"/> Other

<sup>3</sup> Name of the individual representing the entity requesting the deviation

<sup>4</sup> Email ID for further correspondence related to the deviation request

<sup>5</sup> The name of the entity requesting the deviation

date of latest status				<i>If other, specify here</i>
	21/10/2024	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy
Applied version of Standard	<input checked="" type="checkbox"/> GS4GG <input type="checkbox"/> Previous version of Gold Standard			
	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			dd/mm/yyyy
	From another standard to GS4GG			dd/mm/yyyy
	Name of another standard	<input 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 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.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Reference number	DEV_680		
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No There was no finding (CL, CAR, FAR) raised during any certification step (preliminary review, design and/or performance review etc.) that are relevant to this deviation request.		

## 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	Validation and Verification Standard
	Version	V2.0
	Paragraph	Para 7.12.1

## 6.2 | Description of the deviation

Title	Deviation in the use of grid emission factor	
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)
	Insert Text here (if required) to support the selection	
Relevant monitoring period, if applicable	Start date	Dd/mm/yyyy
	End date	Dd/mm/yyyy
Summarise the changes	<p>We used IFI data for calculating the grid emission factor which is not as per the applied Tool.</p> <p>As per Validation and Verification Standard V2.0, par. 7.12.1 and refer to latest version of <a href="#">Deviation Request Requirements and Procedures</a> for requirements and guidelines.</p>	
Reason for deviation	<p>As per paragraph 7.12.1 of Validation and Verification Standard V2.0, deviations from methodology and/or methodological tool (if already approved) or VVB may seek guidance on acceptability of deviation from selected methodology or methodology tool if VVB finds that a revision of the methodology and/or methodological tool would not be required to address the project-specific issue. In such cases, the VVB shall include an assessment of the case including demonstration that the deviation does not require revision of the selected methodology or methodological tool and shall include a description of the impact of the deviation on GHG emission reductions or net anthropogenic GHG removals by the proposed project activity.</p> <p>We didn't calculate the grid emission factor comply with the requirements of the Tool07 because there is no publicly available data in Kazakhstan that can be used to calculate the operational margin, build margin, and combined margin, which we have also confirmed with the project owner. Therefore, we referred to two projects in Kazakhstan that have successfully obtained issuance: Borey Energo (GS12241)<sup>6</sup> and Energo Trust (GS12242)<sup>7</sup>, we adopted the default values of IFI data<sup>8</sup> for default grid factor 2021 version 3.1 prepared by International Financial Institutions Technical Working Group on Greenhouse Gas Accounting available on UNFCCC website<sup>9</sup> publicly available. The database is latest available at the time of PDD submission to VVB for validation, hence the same is considered for emission factor calculations.</p>	
Proposed resolution	We will submit this form and relevant supporting documents to the VVB. After their assessment, we will submit them to GS for review by the GS Secretariat and TAC team.	

<sup>6</sup> [GSF Registry](#)

<sup>7</sup> [GSF Registry](#)

<sup>8</sup> [IFI Default Grid Factors 2021 v3.1\\_unfccc.xlsx](#), Dataset worksheet, Cell No. "C111", Value is converted from gCO<sub>2</sub>/KWh to tCO<sub>2</sub>/MWh

<sup>9</sup> [IFI Default Grid Factors 2021 v3.1 | UNFCCC](#)



<p>Is there any potential temporary or permanent impact of deviation on other aspects of the project?</p>	<p>Select the relevant area:</p> <p><input type="checkbox"/> Project design</p> <p><input type="checkbox"/> Local stakeholder consultation</p> <p><input type="checkbox"/> Safeguarding principles</p> <p><input type="checkbox"/> SDG assessment</p> <p><input type="checkbox"/> Regulatory compliance</p> <p><input type="checkbox"/> Additionality</p> <p><input type="checkbox"/> Applicability of methodology</p> <p><input type="checkbox"/> Annual emission reduction volume <i>(if yes, fill the table below)</i></p> <table border="1" data-bbox="475 589 1437 790"> <thead> <tr> <th data-bbox="475 589 954 701">Annual emission reduction/removal before applying deviation</th> <th data-bbox="954 589 1437 701">Annual emission reduction/removal after applying deviation</th> </tr> </thead> <tbody> <tr> <td data-bbox="475 701 954 745">XYZ tCO<sub>2</sub>e</td> <td data-bbox="954 701 1437 745">XYZ tCO<sub>2</sub>e</td> </tr> <tr> <td data-bbox="475 745 954 790"></td> <td data-bbox="954 745 1437 790"></td> </tr> </tbody> </table> <p><input type="checkbox"/> any other matrix, please specify...</p>	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO <sub>2</sub> e	XYZ tCO <sub>2</sub> e		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
XYZ tCO <sub>2</sub> e	XYZ tCO <sub>2</sub> e						
<p>Summary of the impact</p>	<p>There is no impact of applicability of methodology.</p>						
<p>Insert text here</p>							

### 6.3 | VVB information

<p>Is a VVB opinion on the deviation request required?</p> <p><i>VVB opinion shall be included, where required by the requirements under <a href="#">Deviations Request Requirements and Procedures</a> or request is submitted by the VVB.</i></p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><i>If answer is yes, fill the information in section 6.4 below.</i></p>
---	---

### 6.4 | VVB's assessment

<p>The below information is to be completed by VVB, if applicable.</p>		
<p>VVB's assessment of deviation request</p>	<p>Since there is no publicly available calculation data of the grid emission factors in Kazakhstan, the PP use the IFITWG combined margin emission factors published on the website of UNFCCC, which are the same grid emission factors applied in the similar projects in website, e.g. GS12241 and GS12242. As the CDM tool07 "Tool to calculate the emission factor for an electricity system" does not refer to the IFITWG default data, the PP submitted a deviation request submission form for the use of IFITWG default data as the grid emission factor to the VVB.</p>	
<p>VVB's assessment of impact of deviation request</p>	<p>Considering that there is no publicly available calculation data of the grid emission factors in Kazakhstan, and taking similar GS projects for reference, the validation team accepted this deviation and consider that it is appropriate to use the IFITWG default data as the grid emission factor. This deviation follows the registered GS projects, GS12241 and GS12242, which has been accepted by GS.</p>	
<p>VVB recommendation</p>	<p>Use the only data source IFITWG default data as the grid emission factor.</p>	
<p>VVB details</p>	<p>VVB name:</p>	<p>China Classification Society Certification Co., Ltd. (CCSC)</p>

	Auditor name(s):	Team leader: LI Xingtong Team Member: LI Qiuyan
	Email (s):	lixingtong@c.ccs.org.cn

## 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: <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> <li>- Guidance on VVB opinion</li> </ul>
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