



**Gold Standard**  
for the Global Goals

**FORM**

## **FORM - DEVIATION REQUEST SUBMISSION**

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**PUBLICATION DATE: 12/11/2024**

**VERSION: 6.0**

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### **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](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.

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## 4| **Decision summary**

*To be completed by Gold Standard*

### 4.1 | **General information**

DEVIATION REFERENCE NUMBER	DEVRQ-276
Date of decision	29/01/2026 (Decision revised)
Decision	<input checked="" type="checkbox"/> <b>Approved</b> [No precondition to apply the deviation decision] <input type="checkbox"/> <b>Conditionally approved</b> [Decision is subject to compliance with the precondition defined below] <input type="checkbox"/> <b>Not approved</b>

### 4.2 | **Decision**

#### 4.2.1 | **Decision Summary**

The request for deviation against various requirements of [Stakeholder consultation and engagement requirements v.2.1](#) and [Stakeholder consultation report v.2.0](#) is approved.

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

The deviation is provided only against the requirements mentioned in the form below. The CME shall ensure that project complies with all the other applicable requirements of [Stakeholder Consultation and Engagement Requirements and Guidelines](#). The CME shall document the deviation request, its implications, and GS' decision in the appropriate section of the PDD.

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

VVB shall provide their opinion on project's compliance with all other GS4GG requirements.

#### 4.2.4 | Directions for the Gold Standard, if applicable

ARM team shall review both the project developer's response and the VVB's assessment/opinion of the same and take appropriate steps.

### 4.3 | **Applicability to other activities**

Is this decision applicable to other projects under similar circumstances? <sup>1</sup>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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<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.

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Does this decision set a precedent for future projects with similar circumstances?<sup>2</sup>

Yes

No

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Precedent details (if applicable to other activities)

N/A

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<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> :	Joris Weber
Email ID <sup>4</sup> :	j.weber@southpole.com
Organisation: <sup>5</sup> :	South Pole
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 checked="" type="checkbox"/> PoA GS23264	<input checked="" type="checkbox"/> VPA
GS ID		GS23264	GS23271
Host country(ies)	Switzerland		
Project Title	GS23264 VPA-1 Recovery of metals and minerals from incinerator bottom ash in Switzerland		
Registry link	<a href="https://registry.goldstandard.org/projects/details/5083">https://registry.goldstandard.org/projects/details/5083</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>		

<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

Certification Status and corresponding date of latest status	<input checked="" type="checkbox"/> Listed	<input type="checkbox"/> Certified design	<input type="checkbox"/> Certified project	<input type="checkbox"/> Other <i>If other, specify here</i>
	05/06/2025	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>
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
Transition date, if applicable	From previous GS version to GS4GG		<i>dd/mm/yyyy</i>	
	From another standard to GS4GG		<i>dd/mm/yyyy</i>	
	Name of another standard	<input type="checkbox"/> CDM <input type="checkbox"/> Other Name of the Standard – Insert text here		
Applicable activity requirement	<input 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	DEVRQ-165	
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 <b>Summary of the findings</b> This deviation request is based on the FAR 01 raised during the preliminary review by GS. See "2nd sub_Preliminary Review Submission_PoA_GS 23264 approved" on the registry, page 4. The FAR requests that the project's compliance with stakeholder consultation engagement requirements are validated. As some deviations from GS requirements remain, the CME submits this new deviation request to ensure the project can continue with design certification.	

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	Stakeholder consultation and engagement requirements v.2.1 Stakeholder consultation report v.2.0
	Version	v.2.1 v.2.0
	Paragraph	Stakeholder consultation and engagement requirements v.2.1 <ul style="list-style-type: none"> <li>- Para 3.3.1 &amp; 3.3.2</li> <li>- Para 3.4.2</li> <li>- Para 3.5.1 &amp; 3.5.2</li> <li>- Para 3.6.1 &amp; 3.6.3</li> <li>- Para 3.7.1</li> </ul> Stakeholder consultation report v.2.0 <ul style="list-style-type: none"> <li>- Para C1.2.</li> </ul>

**6.2 | Description of the deviation**

Title	Deviations from stakeholder consultation and engagement requirements for VPA and PoA stakeholder consultation	
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><b>VPA consultation</b></p> <ol style="list-style-type: none"> <li>a. Invitation tracking table and attendance records. Para B.1. and para C.1.2. of the stakeholder consultation report template require a list of invitees and a list participants. There is no detailed list of invitees or attendees available.</li> <li>b. Group of stakeholders. Para 3.3 of the stakeholder consultation and engagement requirements defines a minimum group of stakeholders to be consulted. Since no list of invitees is available, it can not be proven that the minimum group of stakeholders has been invited.</li> <li>c. Feedback round. Para 3.6 of the stakeholder consultation and engagement requirements requires a stakeholder feedback round lasting for at least 30 days. It also requires that at the end of the feedback</li> </ol>	

round, all comments are consolidated. Stakeholders were invited to provide feedback throughout and after the consultation, but no deadline has been communicated. Also, no feedback was consolidated, since no feedback was received during the feedback round.

has a notebook in place to collect feedback, but no further feedback has been provided.

d. Invitation to consultation.

Para 3.4.2 of the stakeholder consultation and engagement requirements requires that invites are to be sent 30 days before the meeting. Invitation to consultation has been sent 10 days before the event.

e. Sharing of key information

Para 3.5.1 and para 3.5.2 of the stakeholder consultation and engagement requirements requires a variety of information to be shared with stakeholders prior to the physical meeting. Para 3.6.3 of the stakeholder consultation and engagement requirements requires the same information to be shared during the meeting. A presentation was shared with stakeholders prior and during the consultation. The presentation covered most key information, but missing some aspects. For example, climate impact and jobs were mentioned, but it lacked a reference to the specific SDGs. Also, avoiding noise and dirt pollution was mentioned, but failing to refer to the specific safeguards (see attached "VPA LSC Presentation").

**PoA consultation**

a. Documentation of comments.

Para 3.7.1 of the stakeholder consultation and engagement requirements requires that the project developer ensures that all the comments received are well documented in the form they are received. Comments were documented but summarized.

b. Feedback round.

Para 3.6 of the stakeholder consultation and engagement requirements requires a stakeholder feedback round lasting for at least 30 days. It also requires that at the end of the feedback round, all comments are consolidated. Stakeholders were invited to provide feedback before, throughout and after the consultation, but no deadline has been communicated. Also, no feedback was consolidated, since no feedback was received during the feedback round.

c. Sharing of key information

Para 3.5.1 and para 3.5.2 of the stakeholder consultation and engagement requirements requires a variety of information to be shared with stakeholders prior to the physical meeting. Only high level information was shared prior to the physical meeting. Para 3.6.3 of the stakeholder consultation and engagement requirements requires the same information to be shared

	<p>during the meeting. Most relevant information was shared verbally, missing written documentation.</p>
<p>Reason for deviation</p>	<p><b>VPA consultation</b></p> <p>General: The local stakeholder consultation was held on 01/07/2021 in a local gym, at the height of COVID, and subject to quickly changing restrictions. The stakeholder consultation was advertised to the public through various channels, such as the municipality’s website and a physical newsletter for all households registered in the municipality of Full-Reuenthal (VPA site). Given the importance of the local community and their perception of the waste recovery facility, the invitation was addressed to the general public, including all genders and age groups.</p> <ul style="list-style-type: none"> <li>a) As the invitation was addressed to the public through the municipality, no list of invitees is available. Since the COVID restrictions created a lot of uncertainty and it was challenging to engage participants individually, the stakeholder consultation measures were reduced to the minimum. For this reason, SELFRAG focused on informing the public about the project and its impact.</li> <li>b) The invitation process for stakeholder consultation strongly focused on the local community, as they are most affected by the project activity. Photos prove that there was great participation from the local community, especially considering the heavy COVID restrictions. The majority of the minimum group of stakeholders was invited in close cooperation with the municipality. This unfortunately led to an unconformity with the stakeholder invitation process and the track record for the list of invitees getting lost.</li> <li>c) The approach of the VPA implementer was to keep stakeholders involved from the start and throughout the entire project development process, which is why feedback was encouraged to be integrated indefinitely. It was therefore missed to give a finite deadline. Integration of feedback was possible for a long time, as the preliminary review was delayed (see above referenced past deviation request).</li> <li>d) The invites were sent only 10 days before the event. The reason was that COVID restrictions created major challenges for the organisation of the event due to uncertainties regarding the location and possible attendees.</li> <li>e) The stakeholder consultation was launched at a very early stage of the project, where many of the details were not yet fully known to the project developer. Additionally, a lot of information was shared verbally, instead of written, as per common practice.</li> </ul> <p><b>PoA consultation</b></p> <ul style="list-style-type: none"> <li>a) Since none of the comments received during the PoA consultation were relevant for the programme design, the VPA implementer was under the impression that a summary would</li> </ul>

	<p>be sufficient. During the onsite audit, the VVB conducted interviews with the stakeholders that participated in the event to prove the relevance of the received comments. It was confirmed that there were no concerns regarding the programme design and that no general comments remained unanswered.</p> <p>b) The approach of the VPA implementer was to keep stakeholders involved from the start and throughout the entire project development process, which is why feedback was encouraged to be integrated indefinitely. It was therefore missed to give a finite deadline according to GS guidelines. Integration of feedback was possible for a long time, as the preliminary review was delayed (see above referenced past deviation request). As no further relevant feedback was received during the feedback round, no summary of feedback has been listed.</p> <p>c) The stakeholder consultation was conducted outdoors, and a lot of the information was shared verbally instead of written, as per common practice. In addition, the consultation was conducted at the site of the VPA, with the majority of stakeholders already having either participated during the VPA stakeholder consultation before, or at other events. The project developer has presented its project at various occasions.</p>
<p>Proposed resolution</p>	<p><b>VPA consultation</b></p> <p>The VPA implementer managed to conduct a stakeholder consultation during the challenging COVID situation, and still was able to include as many stakeholders as possible, most importantly the local community. SELFRAG closely collaborates with the municipality and local population, as well as inviting stakeholders to visit the waste recovery facilities and leaving feedback or suggestions as part of the grievance process. The VPA implementer has ensured and will continue to involve stakeholders during the operation of the VPA.</p> <p>In the frame of the design certification audit, the VVB confirmed through interviews with the minimum group of stakeholders, that the consultation meeting was adequately conducted according to GS guidelines, and stakeholders continue to be consulted and involved, beyond the consultation.</p> <p>In addition, the shortcomings of the VPA consultation were compensated by conducting the PoA consultation at the site of the VPA as flagship project of the PoA, and inviting a variety of stakeholders, covering the required group of stakeholders.</p> <p><b>PoA consultation</b></p> <p>In the frame of the design certification audit, the VVB confirmed that the VPA implementer has attendance records, meeting agenda, and video material to assess the participation of stakeholders in the consultation meeting. The invitation and attendance records confirmed the presence of stakeholders from different groups relevant to project activity. The stakeholders were invited from the local community,</p>

	<p>municipality, scientific &amp; economic associations and NGO. The VVB confirmed that summarized comments were indeed not relevant to programme design. Interviews during the audit further confirmed there was no feedback relevant to programme design.</p> <p>The VPA implementer has taken on various efforts to make up for the shortcomings in the past, and continues to do so. They strongly support the community by attending all relevant stakeholder events, regular presence in the media, and organizing tours of their production facility with science and industry representatives to promote their innovative fragmentation technology. The VPA implementer ensured to track any future feedback, and act upon it according to the grievance process.</p> <p><b>General</b></p> <p>It should be noted that the applied methodology was specifically developed for this project. The significant delays during methodology development also led to delays in registering the project (see above referenced deviation request). Due to these delays, the stakeholder consultations have been conducted a long time ago.</p> <p>Conducting new stakeholder consultations was not a possibility, as the project already faced significant financial pressure, as the delays in methodology development naturally also led to delay in carbon finance. Needing to conduct additional stakeholder consultations would have led to further delays. This has been discussed with GS before the preliminary review and was considered appropriate.</p>				
<p>Is there any potential temporary or permanent impact of deviation on other aspects of the project?</p>	<p>Select the relevant area:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Project design</li> <li><input checked="" type="checkbox"/> Local stakeholder consultation</li> <li><input type="checkbox"/> Safeguarding principles</li> <li><input type="checkbox"/> SDG assessment</li> <li><input type="checkbox"/> Regulatory compliance</li> <li><input type="checkbox"/> Additionality</li> <li><input type="checkbox"/> Applicability of methodology</li> <li><input type="checkbox"/> Annual emission reduction volume <i>(if yes, fill the table below)</i></li> </ul> <table border="1" data-bbox="472 1877 1442 2063"> <thead> <tr> <th data-bbox="472 1877 951 2011">Annual emission reduction/removal before applying deviation</th> <th data-bbox="951 1877 1442 2011">Annual emission reduction/removal after applying deviation</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 2011 951 2063"><i>No change</i></td> <td data-bbox="951 2011 1442 2063"><i>No change</i></td> </tr> </tbody> </table>	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	<i>No change</i>	<i>No change</i>
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				
<i>No change</i>	<i>No change</i>				

	<input type="checkbox"/> 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.

There is no impact on the annual emissions reductions. The deviation request serves the purpose to continue with design certification.

### 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 <a href="#">Deviations Request Requirements and Procedures</a> 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.*)

Document 1: Draft VPA Stakeholder Consultation Report

Document 2: Draft PoA Design Consultation Report

Document 3: VPA LSC Invitation

Document 4: VPA LSC Presentation

Document 5: VPA LSC Photos (1- 3)

Document 6: VPA Stakeholder Feedback Round

Document 7: POA Design Consultation Video

Document 8: POA Stakeholder Feedback Round

## 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