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

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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-392
Date of decision	20/04/2026
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

The deviation request is approved on the condition that the VVB shall do a cross-check site visit (at least remote audit or onsite through a local expert) and the VVB shall ascertain how the original site visit does not pose any risk to the integrity of the system.

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

The project developer (PD) must submit all the related evidence for VVB/GS review.

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 until 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 VVB shall validate the justification and supporting evidence provided by the Project Developer in order to form and submit its opinion to GS for review. The justification and evidence shall include the following:

- Evidence of the actual site visit conducted.
- Documents submitted by the PD to the VVB prior to the site visit, provided at the early stage of the preliminary review.
- The VVB's opinion on how all findings and stakeholder comments (if any) identified after the site visit were considered and addressed in the Final Validation Report (FVR).

In addition, the VVB shall explicitly confirm the following:

- That there were no changes to the project design between listing and validation, and that the scope of the site visit adequately covered the project design as validated.
- Whether any aspects included in the validation did not exist at the time of the site visit, and how such aspects were assessed by the VVB.
- Whether there are any risks associated with validating the proposed project prior to listing.

The VVB shall also implement all applicable requirements related to the site visit (e.g., substantiating a pre-listing site visit through additional audit effort) and clearly demonstrate compliance with relevant provisions to confirm that the validation audit was conducted appropriately and in accordance with GS rules.

…

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?[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] :	Gediz S. Kaya
Email ID[4] :	gkaya@gaiaclimate.com
Organisation:[5]:	Gaia Climate Finansal Danışmanlık Hizmetleri ve Ticaret Anonim Şirketi
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	*GS12225* *GSXXXX*		*GS XXXX* *GS XXXX*		*GS XXXX* *GS XXXX*
Host country(ies)	Türkiye				
Project Title	Oslomej Solar Power Plant				
Registry link	**https://registry.goldstandard.org/projects/details/4365**				
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below *Insert text here*				
Certification Status and corresponding	☒ Listed	☐ Certified design		☐ Certified project	☐ Other *If other, specify here*

[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

date of latest status	*17/11/2023*		*dd/mm/yyyy*	*dd/mm/yyyy*	*dd/mm/yyyy*
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** *Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number*		

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	Site Visit and Remote Audit Requirements and Procedures
	Version	Version 2.0
	Paragraph	Section 3

6.2 | Description of the deviation

Title	Early site visit conducted prior to project listing

<table>
<tr><td rowspan="2">Confirm the nature of changes related to deviation</td><td colspan="2">☒ Temporary
(e.g. not expected to occur beyond one monitoring period)</td><td>☐ Permanent
(e.g. deviation from requirements prior to submission for certification)</td></tr>
<tr><td colspan="3">Insert Text here (if required) to support the selection</td></tr>
<tr><td rowspan="2">Relevant monitoring period, if applicable</td><td>Start date</td><td colspan="2">Dd/mm/yyyy</td></tr>
<tr><td>End date</td><td colspan="2">Dd/mm/yyyy</td></tr>
<tr><td>Summarise the changes</td><td colspan="3">The deviation request relates to the timing of the validation site visit, which was conducted prior to the Project achieving Listed status.
In accordance with GS4GG P&R V2.1 para 5.1.13 the site visit should take place after listing. However, in this case, the site visit was conducted approximately two months in advance of the listing date due to misleading guidance and endorsement of the VVB, ReCarbon Ltd. The supporting evidence has been uploaded separately to the Assurance Platform.
This represents a temporary procedural deviation limited to the sequencing of validation steps, without any impact on the scope, content, or outcomes of the validation process.</td></tr>
<tr><td>Reason for deviation</td><td colspan="3">The validation site visit was conducted on 13/09/2023 prior to the project achieving Listed status (17/11/2023) but after its submission for preliminary review with guidance and endorsement of the VVB. Gaia Climate and the Project Owner were persuaded with such scheduling by the VVB, ReCarbon Ltd. During the discussions between the Project Owner and the VVB regarding validation service planning, it was clearly communicated that the VVB did not have any availability for conducting the site visit until the end of November, unless the proposed day of 13/09/2023 by the VVB is agreed, as also evidenced by the email correspondence. Accordingly, an earlier site visit date was agreed upon jointly. The VVB had never mentioned about the possibility that this would be an issue to be raised during registration review. We would like to express that we, as GAIA Climate reviewed the GS4GG “Site Visit and Remote Audit Requirements and Procedures Version 2.0”, Section 3, and we assessed that it did not explicitly prohibit conducting site visits prior to project listing and trusted in the selected VVB’s proposal of the site visit date.

Also, we were in communication with SustainCert regarding the assessment of country eligibility after request for preliminary review and during these communications no issues or barriers</td></tr>
</table>

	were identified that would prevent the project from achieving Listed status. Therefore we wrongfully assumed that the project was about to achieve the listed status and were looking forward to see the status change on the SustainCert platform. Even though there was the slightest risk that the project might not be listed, the Project Owner acknowledged the risk that the project might not be listed and explicitly accepted this risk in order to proceed with the scheduled site visit and avoid delays due to expected deterioration in seasonal weather conditions, which could have negatively impacted site accessibility and caused further delays. In summary, the site visit took place before the Project achieved the "Listed" status solely on the VVB's own availability and scheduling, and the Project Owner and we, as GAIA Climate aligned with this proposed timeline. Following the site visit, the project achieved Listed status within approximately two months. During this interim period, we would like to underline that no validation activities were conducted. All validation activities, including desk review, were initiated only after the project achieved Listed status, in full alignment with GS P&R V2.1 requirements, as the VVB previously explained in the review round. We sincerely regret any inconvenience this may have caused and kindly request your understanding in this matter.
Proposed resolution	Based on our assessment, the deviation does not affect the integrity, accuracy, completeness, or conservativeness of the validation process. All formal validation steps, including the desk review, were conducted only after the project achieved Listed status, ensuring alignment with GS P&R V2.1 requirements. The site visit findings remain valid and representative of actual project conditions. The deviation relates to a limited period of approximately two months, and conducting the site visit slightly earlier does not result in any changes to the project's operation, emission reductions, or any other monitoring parameters. Based on our assessment, the deviation does not affect the integrity, accuracy, completeness, or conservativeness of the validation process. We respectfully note that the timing of the site visit was primarily driven by the VVB's scheduling, as well as site-specific constraints, and was carried out in good faith to avoid potential delays. We sincerely regret any inconvenience this may have caused and kindly request your understanding in this matter.

<table>
<tr><td>Is there any potential temporary or permanent impact of deviation on other aspects of the project?</td><td>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)
<table><tr><th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/ removal after applying deviation</th></tr><tr><td>XYZ tCO_2e</td><td>XYZ tCO_2e</td></tr><tr><td></td><td></td></tr></table>☐ any other matrix, please specify…</td></tr>
<tr><td>Summary of the impact</td><td>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.</td></tr>
<tr><td colspan="2">Insert text here</td></tr>
</table>

6.3 | VVB information

Is a VVB opinion on the deviation request required? *VVB opinion shall be included, where required by the requirements under [Deviations Request Requirements and Procedures] 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.

<table>
<tr><td colspan="2">VVB's assessment of deviation request</td><td>Please confirm the nature of deviation.</td></tr>
<tr><td colspan="2">VVB's assessment of impact of deviation request</td><td></td></tr>
<tr><td colspan="2">VVB recommendation</td><td></td></tr>
<tr><td rowspan="3">VVB details</td><td>VVB name:</td><td></td></tr>
<tr><td>Auditor name(s):</td><td></td></tr>
<tr><td>Email (s):</td><td></td></tr>
</table>

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. Supporting evidence (email correspondence between the Project

Owner and the VVB, Recarbon Ltd.)

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: - 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