

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-397
Date of decision	15/04/2026
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 not approved. In order to change the scope of the methodology "Recovery and Recycling of Materials from Solid Wastes", v1.0, which covers only metals, alloys, and minerals from municipal solid waste streams, the project developer must follow the procedure in the [Procedure for development, revision, and clarification of methodologies and methodological tools](#) for methodology revision.

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

N/A

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

N/A

4.2.4 | Directions for the Gold Standard, if applicable

N/A

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

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.

Precedent details (if applicable to other activities)

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 :	Peter Holywell
Email ID ⁴ :	pholywell@getagriptyres.com.au
Organisation: ⁵	East-West Pilbara Rubber Recycling Pty Ltd
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	GS23495		
Host country(ies)	Australia		
Project Title	East-West Pilbara Rubber Recycling		
Registry link	(Not yet listed on Gold Standard Impact Registry)		
Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below		
Certification Status and corresponding date of latest status	☐ Listed	☐ Certified design	☐ Certified project ☒ Other Preliminary Review – In Preparation
	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy
			05/12/2025

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
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 <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.			☐ Yes ☒ No
Reference number	N/A		
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 During GS23495 Preliminary Review No. 1, Gold Standard ARM issued an observation in the Assurance Platform's "View Active Conversation" tab that the project must seek a formal deviation or revision to Methodology 448 to include rubber, as the current methodology scope is limited to metals, alloys and minerals.		

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	Recovery and Recycling of Materials from Solid Wastes
	Version	v1.0
	Paragraph	3.1.1

6.2 | Description of the deviation

Title	<i>Inclusion of rubber recovered from end-of-life tyres in the material scope of Methodology 448</i>	
Confirm the nature of changes related to deviation	☐ Temporary (e.g. not expected to occur beyond one monitoring period)	☒ Permanent (e.g. deviation from requirements prior to submission for certification)
	<i>This request concerns a deviation from the material scope defined in Methodology 448 prior to project certification.</i>	
Relevant monitoring period, if applicable	Start date	N/A
	End date	N/A
Summarise the changes	This request is for a deviation from Methodology 448 prior to submission for certification under the Gold Standard for the Global Goals (GS4GG). The project developer seeks approval to apply Methodology 448, <i>Recovery and Recycling of Materials from Solid Wastes v1.0</i>, to rubber recovered from end-of-life tyres, including off-the-road (OTR) tyres and giant mining tyres (GMTs). Section 3.1.1 of Methodology 448 defines the material scope of the methodology as the recovery and recycling of metals, alloys, and minerals from solid waste streams. While the methodology allows a broad range of eligible solid waste streams, including industrial waste, rubber recovered from end-of-life tyres is not currently included within the material scope. This request therefore seeks a limited deviation to include rubber recovered from end-of-life tyres as a solid waste within the material scope of Methodology 448, while leaving all other methodological provisions unchanged. The project processes end-of-life mining tyres to recover both steel and rubber fractions. Recovered steel, which represents a smaller share of the mass of end-of-life OTR tyres, already falls within the current material scope of the methodology. This deviation request applies only to the recovered tyre rubber fraction.	

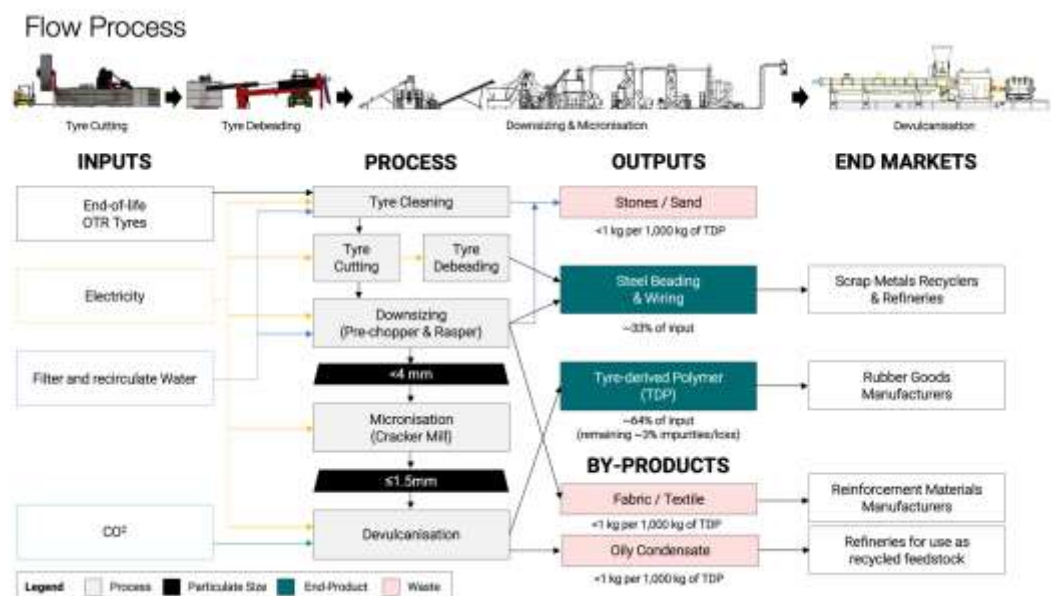


Figure 1. Simplified process flow for the EWPRR project showing inputs, processing stages, recovered outputs, and downstream end markets. Source: East-West Pilbara Rubber Recycling (EWPRR)

	The recovered rubber is processed through thermomechanical devulcanisation to produce tyre-derived polymer (TDP). TDP is sold for use as a raw material input in the manufacture of new rubber products, including tyres, conveyor belts, and other industrial rubber goods. Consistent with the methodology, the project will provide evidence that the recovered rubber is used downstream, that it is comparable to the virgin material it replaces, and that the substitution factor applied is appropriate. These values will be determined and documented at project level using credible and conservative data sources consistent with Methodology 448, including publicly available literature and independent expert assessments, with all utilised values, assumptions, sources and rationale documented in the PDD appendix and supporting annexes for validation. The project will apply the existing methodological framework under Methodology 448 without modification to the equations, accounting structure, monitoring approach, leakage treatment, or additionality requirements. The deviation does not introduce a new emissions reduction mechanism. It is limited to inclusion of rubber recovered from end-of-life tyres as a solid waste within the material scope of the methodology. Accordingly, the proposed deviation is narrow in scope and remains aligned with the underlying principles of the methodology and the deviation procedure. Environmental integrity will be maintained through conservative quantification; SDG contributions will not be compromised; safeguarding requirements will continue to apply; and the project will remain in compliance with all applicable Australian regulations.
Reason for deviation	Methodology 448 defines applicability criteria for eligible waste streams, recovered materials, and recycling activities. This project satisfies the applicability criteria of the methodology, with the exception of the material category currently specified in Section 3.1.1. The project meets the applicability requirements as follows: <u>Waste stream eligibility</u> Methodology 448 applies to the recovery and recycling of materials from solid waste streams. The East-West Pilbara Rubber Recycling (EWPRR) project processes end-of-life tyres sourced from mining operations, which constitute an industrial solid waste stream. Section 3.2.1(a) of the methodology includes municipal solid waste, industrial waste, e-waste, and “any other solid waste stream” provided that such waste does not contain significant amounts of mercury, infectious materials, or radioactive materials. End-of-life tyres from mining operations meet these conditions and are therefore consistent with the solid waste streams addressed by the methodology. <u>Waste collection and diversion</u> The project recovers end-of-life tyres that are commonly disposed of at mine sites, including through burial in mine pits. In Australia, there is currently no mandatory requirement to recycle off-the-road (OTR) mining tyres, and recovery of this waste stream remains limited.

The project provides an alternative recovery pathway by collecting these tyres from mining operations and processing them to recover steel and rubber fractions. The tyres collected by the project are at the end of their operational life and are not manufacturing scrap or other materials that would otherwise be reintroduced into a production cycle in the absence of the project activity.

The waste tyres are sourced from mining operations within Australia, and no transboundary movement of waste is involved. Collection and handling activities therefore remain within applicable national and regional waste management requirements.

Downstream use of recovered materials

The project produces recovered steel and tyre-derived polymer (TDP), both of which are sold to downstream industrial users. Recovered steel is sold to scrap metal recyclers, brokers, and traders for reintroduction into steel manufacturing supply chains, consistent with the methodology's substitution of virgin materials.

After devulcanisation, the rubber recovered from end-of-life tyres becomes tyre-derived polymer (TDP), which is sold for use as a raw material input in the manufacture of new rubber products, including tyres, conveyor belts, and other industrial rubber goods. Consistent with the methodology, the project will provide evidence that the recovered rubber is used downstream, is comparable to the virgin rubber it replaces, and supports the substitution factor applied. This is consistent with the methodology's requirement that recovered materials be reintroduced into a new product cycle and substitute virgin material use.

Justification for the requested deviation

The only limitation to direct application of Methodology 448 is that Section 3.1.1 currently defines the material scope as metals, alloys, and minerals. Rubber recovered from end-of-life tyres is not currently included within that material scope.

The requested deviation therefore seeks approval to include rubber recovered from end-of-life tyres within the material scope of Methodology 448 for this project. The request does not alter the methodology's baseline logic, emissions accounting, monitoring requirements, leakage treatment, or additionality provisions. It is limited to inclusion of an additional recovered material derived from a solid waste stream.

Relevance of the waste stream and recovery pathway

In Australia, end-of-life OTR mining tyres have a low recovery rate. The dominant end-of-life pathway is onsite disposal, commonly including in-pit burial, with stockpiling and landfill as secondary pathways. Where OTR mining tyres are diverted from disposal, alternative pathways are typically lower-value or non-circular uses rather than return to equivalent industrial applications.

Tyre Stewardship Australia (TSA), which administers the National Tyre Product Stewardship Scheme, reports that Australia generated an estimated 155,000 tonnes of used OTR tyres in 2023–24. Of these, only 13% were recovered, meaning 87% were

not recovered. TSA further notes that the mining sector, which is the main user of OTR tyres by weight, is commonly permitted by governments to bury used tyres at mine sites. TSA's 2023 national OTR business case estimated that, for mining tyres, the dominant end-of-life pathway was onsite disposal (93%), with only small minority shares going to stockpiles (2%), landfill (3%), civil engineering (1%) and pyrolysis (1%). TSA's 2026 supply-chain analysis similarly identifies continued onsite disposal of OTR tyres as one of the five highest circularity constraints in Australia, estimating that approximately 135,000 tonnes each year are managed through onsite disposal.

Tyre percentage recovered and unrecovered by tyre group (2023-24)



Figure 3. Tyre percentage recovered and unrecovered by tyre group (2023-24), Source: Tyre Stewardship Australia (TSA), Australian tyre consumption and recovery – 2023-24, January 2025

These conditions demonstrate that end-of-life mining tyres are currently managed predominantly through disposal in Australia, rather than circular recovery and support the relevance of the proposed recycling pathway under this deviation request.

Proposed resolution

The proposed resolution is that Methodology 448, *Recovery and Recycling of Materials from Solid Wastes v1.0*, be applied to this project so that rubber recovered from end-of-life tyres may be included within the material scope defined in Section 3.1.1, with all other provisions of the methodology remaining unchanged.

The EWPRR project will apply the methodology's existing equations, parameters, and monitoring requirements to recovered rubber in a manner consistent with the established framework:

- Baseline emissions, substitution factors, and baseline recovery assumptions will be determined using credible data sources and conservative assumptions, consistent with Sections 4.4, 4.6, and 4.11.
- Project and leakage emissions will be quantified in accordance with Sections 4.7 and 4.8, including energy use, transport, and other relevant processing inputs.
- All monitored parameters required under Section 6.1 will be monitored, recorded and verified, including recovered material quantities, energy consumption, and downstream sales.
- Conservativeness and accuracy are ensured through the application of established methodological requirements, including appropriate emission factors and inclusion of all relevant project and leakage emissions.
- No modifications to the methodology's accounting framework are required beyond the inclusion of rubber within the material scope defined in Section 3.1.1, and emission reductions will not be overestimated.

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 (<i>if yes, fill the table below</i>) <table border="1" data-bbox="373 584 1345 862"> <thead> <tr> <th data-bbox="373 584 852 701">Annual emission reduction/removal before applying deviation</th> <th data-bbox="852 584 1345 701">Annual emission reduction/removal after applying deviation</th> </tr> </thead> <tbody> <tr> <td data-bbox="373 701 852 817">14,043 tCO₂e (steel fraction currently under material scope)</td> <td data-bbox="852 701 1345 817">56,733 tCO₂e (steel and rubber fractions if the requested deviation is approved)</td> </tr> <tr> <td data-bbox="373 817 852 862"></td> <td data-bbox="852 817 1345 862"></td> </tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	14,043 tCO ₂ e (steel fraction currently under material scope)	56,733 tCO ₂ e (steel and rubber fractions if the requested deviation is approved)		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
14,043 tCO ₂ e (steel fraction currently under material scope)	56,733 tCO ₂ e (steel and rubber fractions if the requested deviation is approved)						
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.						

The requested deviation affects the material scope of the methodology and its applicability to the recovered rubber fraction of the project.

The EWPRR project processes end-of-life OTR tyres and recovers both steel and rubber. While the steel fraction is already included within the existing material scope of the methodology, the rubber fraction is the subject of this deviation and is expected to account for approximately 75% of the project's total indicative emission reductions.

Approval of the deviation enables the methodology to be applied consistently across all recovered material fractions derived from an eligible waste stream, without modification to the methodological framework.

The requested deviation affects which parts of the project are eligible under the methodology and, as a result, the indicative annual emission reductions that could be credited. Before the deviation is applied, the indicative annual emission reductions reflect only the steel fraction currently within the material scope of Methodology 448. After the deviation is applied, they reflect both the steel and rubber fractions. This difference arises only from inclusion of the recovered rubber fraction within the material scope of Methodology 448. The deviation does not change the project design, monitoring, data collection, regulatory compliance, additionality, or the calculation approach for emission reductions. All other requirements of the methodology remain unchanged.

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</i>	Yes ☐ No ☒ <i>If answer is yes, fill the information in section 6.4 below.</i>
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<i>Deviations Request Requirements and Procedures</i> or request is submitted by the VVB.	
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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. Downstream Offtake and End-Use Evidence

Document 2. Australian Tyre Consumption and Recovery - 2023-24

Document 3. Tyromer TDP Environmental Benefits Assessment

Document 4. Tipping the Balance (TSA Report)

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