

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	DEVREQ-427
Date of decision	25/05/2026
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

Clause 8.1 of the [Validation & Verification Body Requirements](#) stipulates that a Validation and Verification Body must hold a formally approved sectoral scope in order to conduct validation and verification activities.

In consideration of TÜV SÜD's ongoing accreditation scope extension ANAB Scope 4: Carbon Capture and Storage (CCS), which requires a witness assessment, and which is a prerequisite for GS approval for scope 16, CCS, Gold Standard Secretariat hereby approves TÜV SÜD's deviation request to conduct a validation/verification of Green Plains Ethanol CDR Project developed by Green Plains Inc, as a case for said witness assessment.

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

This approval allows TÜV SÜD to validate and verify Green Plains Ethanol CDR Project developed by Green Plains Inc once for the purpose of conducting the ANAB witness assessment and supporting the accreditation scope extension process.

Such approval is granted solely for this purpose and does not constitute formal authorization to independently undertake validation or verification activities under Scope 16 until the accreditation extension and Gold Standard approval have both been formally granted.

The design/performance certification request of the Green Plains Ethanol CDR Project may only be submitted to Gold Standard after TUV SUD America has obtained both:

- Accreditation by ANSI for scope 4, CCS
- Approval by GS under the Carbon Capture and Storage certification pathway/scope 16.

Please ensure that the project developer is aware of this and agrees to the conditions.

You may proceed with the rest of the re-approval application. The re-approval for all other scopes may be closed before obtaining accreditation and approval for the CCS scope, if the latter takes much longer.

4.2.4 | Directions for the Gold Standard, if applicable

You may proceed with the rest of the re-approval process. The re-approval for all other scopes may be closed before obtaining accreditation and approval for the CCS scope, if the latter takes much longer.

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)	

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 :	Nina Pinette
Email ID ⁴ :	nina.pinette@tuvsud.com
Organisation: ⁵	TÜV SÜD America Inc.
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	GS ID unknown as the project has not yet been listed	N/A	N/A
Host country(ies)	USA		
Project Title	Green Plains Ethanol CDR Project, developer is Green Plains Inc.		
Registry link	Not yet available		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding	☐ Listed ☐ Certified design	☐ Certified project	☒ Other <i>The project is not yet listed</i>

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	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>
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TÜV SÜD has a contract to conduct the Validation/Verification (design certification/ first performance certification) for this project

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	<i>dd/mm/yyyy</i>
	From another standard to GS4GG	<i>dd/mm/yyyy</i>
	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
 Engineered Removals

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
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 <i>Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number</i>	

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/ Verification Body Requirements
	Version	3.0
	Paragraph	Annex D Sectoral Scopes and Technical Knowledge Required

6.2 | Description of the deviation

Title	TÜV SÜD is in the process of obtaining the required accreditation scope extension necessary for Gold Standard Scope 16: Carbon capture and storage of CO2 in geological formation. This aligns with our accreditation body's—ANSI National Accreditation Board (ANAB)—Scope 4 Carbon Capture and Storage. TÜV SÜD will be coordinating with ANAB to initiate the scope extension procedure and prepare the documentation required for compliance, including arranging a witness assessment using this project as the reference case.	
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)
	TÜV SÜD anticipates that the approval of the accreditation scope extension will be obtained as part of this validation/verification.	
Relevant monitoring period, if applicable	Start date	07/11/2025 (estimated)
	End date	31/03/2026 (estimated)
Summarise the changes	TÜV SÜD does not currently hold the accreditation scope extension for carbon capture and storage. In order to obtain it, the ANSI National Accreditation Board (ANAB) will be conducting a witness assessment of the validation/verification of this project. This is being submitted to Gold Standard as part of the VVB's re-approval application.	
Reason for deviation	Gold Standard requested TÜV SÜD to submit a Deviation Request specifying exactly which project we will be auditing and for what specific audit, so GS can officially approve it and we do not have any issues during review.	
Proposed resolution	Gold Standard approves TÜV SÜD to conduct the validation/verification of this project so we may obtain the necessary accreditation scope extension.	
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	Select the relevant area: N/A	
	☐ 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>	
	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation
	N/A	N/A
	☐ any other matrix, please specify...	
Summary of the impact	This deviation request has no impact on the validation/verification itself. TÜV SÜD acknowledges that the certification request may only	

	be submitted to Gold Standard after we have obtained approval by GS under the Carbon Capture and Storage certification scope.
Insert text here	

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 Deviations Request Requirements and Procedures or request is submitted by the VVB.</i>	Yes ☐ No ☒ <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	N/A	
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.*)

N/A

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