

TEMPLATE

# DEVIATION REQUEST FORM

---

PUBLICATION DATE **11.04.2021**

Version **5.0**

---

## A. To be completed by Gold Standard

### 1 | Decision

**1.1 | Date – 12/02/2025**

**1.2 | Decision**

Approved.

The project developer may continue with the certification process.

**1.3 | Is this decision applicable to other project activities under similar circumstances?**

No

**B. To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation** (Submit deviation request form in Microsoft Word format)

## 2| **Background information**

Deviation Reference Number	DEVQR-73	
Date of decision	12/02/2025	
Precedent (YES/NO)	No	
Precedent details	-	
Date of submission	01/11/2024	
Project/PoA/VPA	Project	ID - GS12952
	<input type="checkbox"/> PoA	ID - GSXXXX
	<input type="checkbox"/> VPA	ID - GSXXXX
Project/PoA/VPA title	FPD Robotic E-Waste Recycling, eLoop, US	
Date of listing	Not yet listed	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	N/a	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/a	
Date of design certification/inclusion (if applicable)	N/a	
Location of project/PoA/VPA	United States	
Scale of the project/PoA/VPA	<input checked="" type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA		
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Retroactive project start date	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	In the PRINCIPLES & REQUIREMENTS version 1.2 4.1.49 (b) Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date. Retroactive Project submitted at a date later than one year from the project start date will not be eligible for Gold Standard certification.	
Specify the monitoring period for which the request is valid (if applicable)	Start date N/a	End date

Submitted by	Contact person name: David O'Shea
	Email ID: doshea@fpdrecycling.com
	Organisation: PEREGRINE SUSTAINABILITY SOLUTIONS LIMITED (FPD)
	Project participant: Yes <input type="checkbox"/> No <input type="checkbox"/>
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  If yes; VVB name:  VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

### 3| Deviation detail

#### 3.1 | Description of the deviation:

*\*Guidance\* Use the space below to describe the deviation and substantiate the reason for requesting deviation from applicable rules/requirements. Please include all relevant information in support of the request. You are requested to follow the principles for requesting deviations, given in the [Deviation Approval Procedure/Design Change Requirements](#).*

The project "FPD Robotic E-Waste Recycling, eLoop, US" had the Stakeholders Consultation on 5 August 2024 at 3500E College Ave, State College, PA 16801, United States.

The start date of the project was on 21 April 2023 according to the document "Equipment handover document 21.04.2023". Therefore, the project is retroactive since the Stakeholders' Consultation was after the start date of the project.

The project does not meet the rule from the PRINCIPLES & REQUIREMENTS, version 1.2:

4.1.49 (b) Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date. Retroactive Project submitted at a date later than one year from the project start date will not be eligible for Gold Standard certification.

The time of first submission for preliminary review is: 01/11/2024 which is later than 1 year.

### 3.1.1 | Deviation detail (to be completed by Project developer):

We like to describe below the fact that the project developer had strong actions related to prior consideration of the carbon credits, but due to operational and financial problems, they could not submit the documents for Preliminary review earlier, within one year.

The Project Developer has submitted on 17 January 2021 to Gold Standard the application with all documents to open a registry account and the open of the account was confirmed by GS on 06<sup>th</sup> January 2022 for Impact Registry and the confirmation for Sustain Cert is 06<sup>th</sup> January 2022.

The management vision of obtaining carbon revenues for their Project began on 3<sup>th</sup> August 2022, before the start date of the project when they contacting a consultant to develop a pre-feasibility study on CO2 emission certification.

The following actions have been done by the company in order to acquire carbon revenues before the start date of the project (21<sup>st</sup> April 2023). At the same time, after the start date of the project, continuous actions have been taking for the same purpose to obtain carbon credits and will be described in the table below:

No	Date	Action	Document
1	6 <sup>th</sup> January 2022	SustainCert approval and account opening	Proof open account SustainCERT_E-mail from 06.01.2022
2	6 <sup>th</sup> January 2022	Gold Standard approval and accounts opening	Proof open account GS Registry_E-mail from 06.01.2022
3	3 <sup>th</sup> August 2022	First interaction with consultants from Carbon Expert in order to discuss about the eligibility of the type of the project and the carbon credits.	"E-mail from 03 August 2022"
4	13 <sup>th</sup> April 2023	Carbon Expert sent the offer for a prefeasibility study, that would include estimated costs and revenues for GS certification.	"E-mail from 13 April 2023"
5	21 <sup>st</sup> April 2023	The agreement with the consultants from Carbon Expert was signed and the pre-feasibility study starts.	"E-mail from 21 April 2023"

6	17 <sup>th</sup> July 2023	Discussions continued on the certification of the new project with consultants from Carbon Expert. Carbon Expert starts project pre-analysis with the calculation of emissions reduction, verification of the eligibility with the GS rules and the applicability of the methodology. The entirety period were sent technical emails with the consultants and physical meetings in this respect. The report of the prefeasibility study was received on 17 <sup>th</sup> July 2023 .	"E-mail from 17 July 2023"
7	3 <sup>th</sup> August 2023	Management decision regarding the certification of the recycling project.	"E-mail from 3 August 2023"
8	9 <sup>th</sup> August 2023	E-mail from Carbon Expert with the proposal agreement	"E-mail from 9 August 2023" and the proposal for the certification process
9	7 <sup>th</sup> February 2024	Online meeting to discuss certain operational and financial issues from the agreement and process of certification. Between August 2023 and February the proposal agreement for the certification was negotiated by phone or online meetings.	"E-mail from 7 February 2024"

10	15 <sup>th</sup> February 2024	E-mail from Carbon Expert with contractual agreement	"E-mail from 15 February 2024" and Draft agreement for the consultancy of the project
11	4 <sup>th</sup> April 2024	E-mail from Carbon Expert with the revised draft agreement negotiated.	"E-mail from 4 April 2024"
12	19 <sup>th</sup> April 2024	Signed agreement with Carbon Expert for the consultancy on the carbon credits certification process.	Signed agreement Carbon Expert_FPD Recycling_19.04.2024
13	09 <sup>th</sup> July 2024	Submission of the project in the existing Sustain Cert Account of FPD Recycling	"Proof from the account with the creation date of the project_09.07.2024"

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

### 3.2 | Assessment of the deviation:

*\*Guidance\* Use the space below to describe how the deviation complies with the requirements, and, where applicable, the accuracy, completeness and conservativeness is ensured. Please include all relevant information in support of the request.*

3.2.1 | Deviation assessment (to be completed by Project developer):

This deviation will not affect the following principles:

- the accuracy,
- completeness and
- conservativeness.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

.....

### 3.3 | Impact of the deviation:

*\*Guidance\* Use the space below to describe the impact of the deviation on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. Please substantiate the impact assessment with relevant and verifiable data/information.*

#### 3.3.1 | Impact assessment (to be completed by Project developer):

This deviation will not affect the following:

- the deviation on project design,
- safeguarding principles assessment,
- SDG assessment,
- emissions reductions,
- monitoring frequency,
- data quality,
- potential risk or any
- other relevant aspect of the project

#### 3.3.2 | VVB opinion (to be completed by VVB, if applicable ):

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

.....



### 3.4 | Documents:

*\*Guidance\* List of documents provided (note that once a decision has been made by Gold Standard, this deviation form along with supporting documents will be made public on the Gold Standard website. If any of the supporting documents are confidential, please indicate here to ensure they are omitted.)*

	Document
1,2	Proof open account SustainCERT_E-mail from 06.01.2022
3	"E-mail from 03 August 2022"
4	"E-mail from 13 April 2023"
5	"E-mail from 21 April 2023"
6	"E-mail from 17 July 2023"
7	"E-mail from 3 August 2023"
8	"E-mail from 9 August 2023" and the proposal for the certification process
09	"E-mail from 7 February 2024"
10	"E-mail from 15 February 2024" and Draft agreement for the consultancy of the project
11	"E-mail from 04 April 2024"
12	Signed agreement CarbonExpert_FPD Recycling_19.04.2024
13	"Proof from the account with the creation date of the project_09.07.2024"
14	Equipment handover document 21.04.2023

Version number	Release date	Description
5	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> </ul> Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption