



Gold Standard[®]
for the Global Goals

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **16.07.2020**

Version **3.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 09/09/2021

1.2 | Decision

The applied deviation request is not approved. The PD shall follow the requirements of FAR#5 raised by SustainCert.

In addition to the above, the PD shall comply with the following requirements:

1. In line with the requirements of paras 10.2.3 and 10.6.1 of [GHG Emissions Reduction & Sequestration Product Requirements](#):
 - a. The start date of the crediting period with Gold Standard shall be the start date of the crediting period under CDM or a maximum of two years before the date of first submission (submission for preliminary review), whichever occurs later. Thus, in this case, the crediting period of projects GS7744 & GS7746 shall start on any date after 22/01/2018 (inclusive), considering that the first submission (for preliminary review) was done on 22/01/2020.
 - b. The crediting period renewal cycle for Certification Renewals of the project seeking GS labelling shall be the same as that in CDM. Thus, the projects under this deviation request (GS7744 & GS7746) must renew their certification under GS4GG as well along with CDM, mirroring the same crediting cycle.
2. The VVB site visit requirements must be met as per para 2.2 of Rule Update [Applicability of Minimum Site Visit Requirements By VVB](#).
3. The PD shall submit request for GS labelling of CDM CERs for the projects for a maximum period of two years from the VVB site visit date (remote/physical). For example, if the VVB site visit is concluded on 01/12/2021, the GS monitoring period must start after 01/12/2019 (inclusive).

The above decision is subject to fulfillment of the following four conditions. The PD must:

1. Ensure continuity in the Project's monitoring activities is maintained and PD can justify that no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). However, if gap(s) exist, the project shall justify that conservative approach(es) have been applied in line with section 3 of the [Deviation Approval Requirements and Procedures \(version 1.1\)](#) and overarching GS principles (as applicable).
2. Document the deviation request, its implications, and GS' decision in the appropriate section of the GS PDD and/or Monitoring Report (for the relevant MP). The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provide its opinion in the Validation and/or Verification Report. SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

FAR for verifying VVB:

The verifying VVB shall assess compliance of GS7744 and GS7746 with the applicable minimum VVB site visit requirements in accordance with the Rule Update [Applicability of Minimum Site Visit Requirements By VVB](#) and shall provide their opinion on the same in the Verification Report.

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

2| Background information

Deviation Reference Number	DEV_185	
Date of decision	09/09/2021	
Date of submission	25/08/2021	
Project/PoA/VPA	<input checked="" type="checkbox"/> Project	ID – GS7744 & 7746
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	West Huaybong 2 wind farm project West Huaybong 3 wind farm project	
Location of project/PoA/VPA	India	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/2589 https://registry.goldstandard.org/projects/details/2591	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Deviation from the FAR raised during design review	
Specify applicable rule/requirements/methodology and version number	GHG-Emissions-Reductions-Sequestration Requirements, v1.2	
Specify the monitoring period for which the request is valid (if applicable)	Start date	End date
Submitted by	Contact person name: Narendra Kumar	
	Email ID:narendra@kosherclimate.com	
	Organization: Kosher Climate India Private Limited	
	Project participant: Yes <input checked="" 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: Auditor name:	

--	--

3| Deviation detail

3.1 | Description of the deviation:

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 guidelines for requesting deviations, given in the Deviation Approval Procedure.

We have submitted the following CDM project for GS registration and the details are given below:

ID	1st Submission for preliminary review	Status
GS7744	22 nd Jan 2020	Design Certified
GS7746	22 nd Jan 2020	Design Certified

During the design review, we noticed the version 2 of 'GHG-Emissions-Reductions & Sequestration product requirement' (version 2) was published. As per para 10.2.3 of this requirement:

"CDM or JI project seeking GSCERs, the start date of the crediting period with Gold Standard shall be the start date of the crediting period under CDM or maximum of two years prior to the date of first submission (submission for preliminary review), whichever occurs later"

Based on this guideline and email confirmation with Gold Standard, the start date of the crediting period is changed to 01/02/2018 which is within 2 years from the first submission.

The design certification is concluded however the following FAR (FAR# 5) was raised in the design review report:

"It's recommended to start the GS CP on 01/12/2019 in CDM CP2. Under GS a site visiting is mandatory in the first two years after crediting period start and once every three years default after that. If GS CP starts from 01 Feb 2018, GS onsite verification shall be conducted by 01 Feb 2020 and PD shall contract VVB for CP renewal prior to CP1 end date, i.e 30/11/2019. During verification, VVB shall verify the crediting period start date under GS."

Considering the fact that the new guideline allows to take the crediting period start date 2 years from preliminary review, conducting site visit within 2 years from start date of the crediting period is hypothetical scenario for many cases including this project case. Moreover we do not see any GS rules that require conducting site visit within two years from start date of the crediting period. The section 5.1.29 & section 5.1.50 of 'Principles & requirements' says the first Verification should be completed within two years of project Implementation Date (not the crediting period start date) or Design Certification, whichever is later

Also undertaking renewal of the crediting period does not make any sense as the project has already applied latest methodology and used latest baseline parameter (ie, grid emission factor).

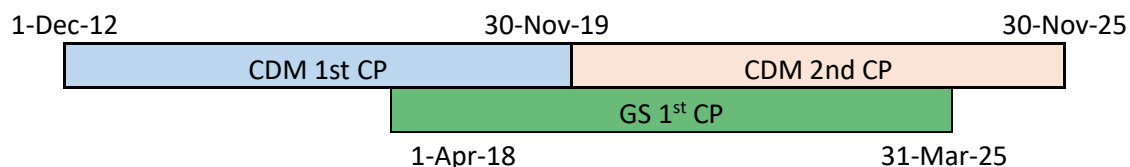
Also it is not possible to postpone the start date of crediting period to 01/12/2019 (CDM 2nd crediting period) as the VERPA has been signed after confirmation received

from GS on the applicability of start date of crediting period that can be 2 year prior to first submission.

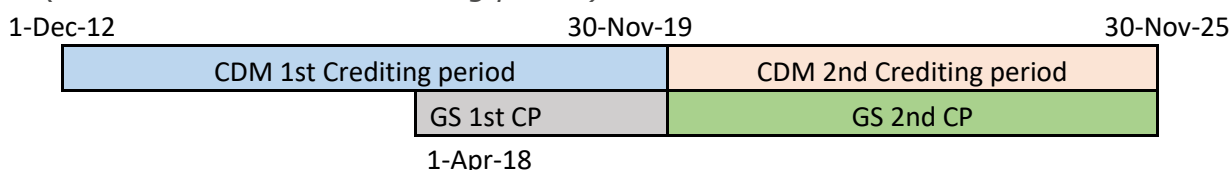
Due to the above reasons, PP will not be able to fulfill the requirement of the FAR#5 raised during the design review.

Hence we request you to approve the deviation with the any of the following alternative measure:

Option 1: We use the same GS crediting period as mentioned in the GS PDD (ie, 1st Apr 2018 to 31st March 2025) irrespective of CDM crediting period.



Option 2: We will submit a new PDD with old emission factor (in line with CDM 1st crediting period) with the crediting period from 1st Apr 2018 to 30th November 2019. And revise the existing PDD crediting period to 1st December 2020 to 30th November 2025 (in line with CDM 2nd crediting period)



VVB opinion (if applicable):

NA

3.2 | Assessment of the deviation:

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

The deviation is relevant to the change in the method of stakeholder consultation. It does not affect the requirements, and accuracy, completeness, conservativeness of any SDG estimation.

VVB opinion and recommendation (if applicable):

NA

3.3 | Impact of the deviation:

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.

The deviation will not have impact on 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.

VVB opinion (if applicable):

NA

3.4 | Documents:

NA