



**TEMPLATE**

# DEVIATION REQUEST FORM

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PUBLICATION DATE **14.1.2021**

Version **4.0**

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## **A. To be completed by Gold Standard**

### **1| Decision**

**1.1 | Date** – 03/11/2021

#### **1.2 | Decision**

The deviation request is approved. However, the VVB shall:

1. Document the deviation request, its implications, and GS' decision in the appropriate section of the Verification Report (for the relevant MP).
2. Explain in the verification report the measures employed to ensure maintenance of impartiality during the audit (in line with its established requirements and procedures).

#### **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	DEV_192	
Date of decision	03/11/2021	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	2/11/2021	
Project/PoA/VPA	Project	
	<input type="checkbox"/> PoA	ID - GS1172
	<input checked="" type="checkbox"/> VPA	<b>ID - GS1174</b>
Project/PoA/VPA title	<u>INDONESIA DOMESTIC BIOGAS PROGRAMME OF ACTIVITIES (IDBP) (ID 1172), VPA-1 (GS1174)</u>	
Location of project/PoA/VPA	Indonesia	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> <b>Small scale</b> <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://impact.sustain-cert.com/project_developer/projects/117">https://impact.sustain-cert.com/project_developer/projects/117</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> <b>Certified project</b>	
Title/subject of deviation	Verification by TUV NORD TL who was also TL at validation	
Specify applicable rule/requirements/methodology and version number	VALIDATION AND VERIFICATION BY SAME VVB RU 2020 PR – PR V1.2	
Specify the monitoring period for which the request is valid (if applicable)	Start date 1 Jan 2020 End date 31 Dec 2020	
Submitted by	Contact person name: Harry Clemens	
	Email ID: <a href="mailto:hclemens@hivos.org">hclemens@hivos.org</a>	
	Organisation: Hivos	
	Project participant: Yes	
Validation and Verification body (VVB opinion shall be included, where required by the	YES	

<p>applicable rules/requirements or request is submitted by the VVB).</p>	<p>VVB name: TUV NORD CERT GmbH</p> <p>Auditor name: Robert Cheong</p> <p>Email: robert.cheong@tuv-nord.com</p>
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### 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](#).*

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

Applicable rule:

1. Rule Update: Validation and verification by same VVB (RU 2020 PR – PR V1.2): page 1, 2.1, Applicability: The Gold Standard projects registered with previous versions of the Standard may also apply this rule update.
2. Rule Update: Validation and verification by same VVB (RU 2020 PR – PR V1.2): page 1, 1, Background: In the context of Programmes of Activities (PoAs), Gold Standard follows the requirements listed in the CDM Project Standard for Programmes of Activities. (Programme of Activity Requirements, V1.2 paragraph 1.1.4, page 3). It requires that if the VVB has performed a validation activity (including for renewal of the PoA period and inclusion of a proposed VPA/CPA in the PoA) for the registered PoA and wishes to perform verification for the same PoA, they shall obtain prior authorization to do so from the Secretariat.
3. Programme of Activity Requirements, V1.2 paragraph 1.1.4, page 3 refers to CDM Project Standard for Programmes of Activities
4. CDM Project Standard for Programmes of Activities refers to the CDM validation and verification standard for programmes of activities
5. CDM validation and verification standard for programmes of activities, par. 293: If the DOE has performed validation for registration or renewal of PoA period of the PoA,

or for inclusion or renewal of crediting period of any of the CPAs covered by the verification, and wishes to perform verification for the same PoA, it shall obtain authorization to do so from the Board in accordance with the "CDM project cycle procedure for programmes of activities".

**PD request that TUV NORD is allowed to conduct verification of MP3 with same VVB Team Leader and Technical Reviewer as during validation of Design Document for Crediting Period II.**

Reasons

Under previous rule, which was applicable at validation and approval of the Design Document, the same VVB was allowed to undertake Validation and Verification of the project

Gold Standard for the Global Goals Principles & Requirements allow that the same VVB may undertake Validation and Verification of a given Project (Principles & Requirements V1.2, paragraph 5.1.28, page 25

5.1.28 Unless otherwise stated (for example in an applied Methodology or Product Requirements), the same VVB may undertake Validation and Verification of a given Project.

Furthermore

- Monitoring and verification of VPA1 (GS1174) and VPA2 (GS5303) has been combined since start of implementation of VPA2, as both are part of the same Indonesia Domestic Biogas Programme with the only difference that VPA1 covers biodigesters installed from 2009 to 2016 and VPA2 covers biodigesters installed from 2017 to date.
- Design of VPA2 CP1 (running from 02/01/2017 to 01/01/2024) has been validated by CTI Centre Testing International while Design of VPA1 CP1 (running from 31/05/2011 to 30/05/2018) has been validated by TUV Rheinland and CP2 (running from 31/05/2018 to 30/05/2025) has been validated by TUV NORD CERT GmbH.

- It would be very inefficient to contract two different VVBs for the verification of the same monitoring period of VPA1 and VPA2 or to conduct verification by different audit teams, due to the fact that the various parties to be interviewed during the verification activities apply to both VPA1 and VPA2 (e.g. the same VPA implementer, common CPOs responsible for construction, one common annual biogas survey used to collect information covering both VPA1 and VPA2).
- TUV NORD CERT GmbH has well established internal procedures to ensure robust verification, including impartiality of the audit during Technical Review. The Team Leader is based in Malaysia. Technical Review is done by an expert of TUV NORD based in East Africa. Final review and approval is conducted in the German Headquarters.

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

As described in the Procedure for the Verification of project activities and PoAs Section 17 – Technical Review as below:

Before the submission of the final verification report a technical review of the whole verification procedure is carried out. The technical reviewers are competent GHG auditors being appointed for the scope this project falls under. The technical reviewers are not considered to be part of the verification team and thus not involved in the decision-making process up to the technical review.

### 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):

The above deviation does not affect negatively the conservativeness of the quantification of GHG emission reductions, nor the accuracy or completeness of data quality.

Through the years of verification, the lead auditor has always been stringent -as it should be- to ensure the quantification of the data applied for GHG emission reductions or removals are traceable to the survey data and database information. The robustness of verification by TÜV NORD CERT GmbH is also illustrated by the fact that in past years the Technical Review of TL/TE verification findings raised a list of questions which are subsequently addressed by PD. We expect that this year the Technical Review will again raise a new list of questions to the VPA1 Monitoring Report and to the Verification Report drafted by TL/TE.

Assuming that COVID-19 situation allows on-site verification in Q2, 2022, the PD commits to contract for both VPA1 (GS1174) and VPA2 (GS5303) a VVB different from CTI Centre Testing International and TÜV NORD CERT GmbH to conduct verification of emission reductions and SDG impacts in Monitoring Period 1 January 2021 – 31 December 2021 (VPA1 MP4 CP2 and VPA2 MP5 CP1). In doing so, we will be able to be fully compliant with VALIDATION AND VERIFICATION BY SAME VVB RU 2020 PR – PR V1.2 in the next Monitoring Period.

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

TÜV NORD has described the internal procedure Technical Review / Final Approval for CDM validation and verification processes, which is guiding equally the verification process of Gold Standard project activities and PoAs. Section 6 of the procedure describe the technical review process as below:

## 6. TECHNICAL REVIEW

### 6.1. TECHNICAL REVIEW APPROACH

The Technical Review (TR) is an independent check of the VVC work as carried out by the VVC team to assure that all requirements of the scheme (CDM, JI etc.) are met. The Technical Reviewer shall not be part of the VVC team. He/she shall not be involved in the validation/verification/determination process of the VVC team up to the technical review.

The (Final) TR has to be carried out by personnel of TÜV NORD CERT GmbH, Germany. Technical reviews carried out by local personnel of the TÜV NORD JI / CDM Certification Program do not substitute the (final) TR.

### 6.2. SUBMISSION OF PROJECTS FOR TR

The projects shall be submitted for TR in a proper condition (i.e. they should be in a condition that could be submitted to UNFCCC (or the DFP, DNA etc.) even without

TR). Internal review circles (if existing in the subsidiary) shall be passed and the project should be released from the internal reviewer for TR.

In order to be able to carry out technical review completely, all relevant information for the technical review shall be made available in the project documentation, the reports or as separate documents. The information shall be in English. The documentation shall contain:

- PDD / MR,
- Excel calculation sheet,
- DVR / FVR,
- financial calculation (in case of validation and additionality justification via investment analysis route),
- documents which have to be submitted to the UNFCCC, GS, VCS (if available) and
- any other supporting documents which enables the technical reviewer to understand the basic assumptions in the decision making process.

In case review results cannot be finally issued, because of missing information, the corresponding information must be procured from the team leader.

### 6.3. SCOPE OF WORK

The TR has to be carried out for:

- Validation / determination PDD
- Verification / determination ERU
- Request for revision of monitoring plan
- Validation on requested changes from the project activity as described in the registered PDD
- Re-validation (renewal of crediting period)

The TR has to be carried out on the final report level.

The TR shall encompass the complete work of the VVC team. Especially it has to be checked that:

- the project documentation as submitted by the client is free of material mistakes
- the report of the VVC team is free of material mistakes and
- decisions taken by the VVC team are transparent and justifiable.

The technical review shall be carried out in a complete manner. All relevant findings shall be documented in the technical review report (S01-F018) during the first review circle. Adding additional findings in possible subsequent reviews should be avoided. The results of the TR shall be communicated to the Team Leader in order to address the issues identified and to carry out or initiate the corresponding corrections. After the corrections have been carried out the Technical Reviewer has to confirm the successful completion of the final TR by forwarding the documentation for final approval.

After successful technical review of the final report an overall (esp. procedural) assessment of the complete verification will be carried out by an appointed person employed with the accredited entity TÜV NORD CERT GmbH. Please refer to procedure S01-VA230 for further details on persons appointed for final approval.

Only after this step, the request for issuance can be started (in case of a positive verification opinion).

The final approval shall be conducted according to procedure S01-VA230 and documented using the form S01-F022 or via dedicated JI/CDM SharePoint solution.

Section B.1 of IDBP verification report will list the audit team.

**B.1. Verification team members**

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of VVB or outsourced entity)	Involvement in			
						Desk review	On-site inspection	Interview(s)	Verification findings
1.	Team Leader	EI	Cheong	Chun Yuen (Robert)	TN Malaysia	x	-	x	x
2.	Enumerator	EI	Sutresniwati	-	-	-	x	x	-

Section B.2 as below list the TR and approver who are not part of the audit team

**B.2. Technical reviewer and approver of the verification and certification report**

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of VVB or outsourced entity)
1.	Technical reviewer	EI	Lubanga	David	-
2.	Approver	IR	Rami	Kunal	TUV NORD CERT GmbH



### 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):

The above deviation does not affect negatively the conservativeness of the quantification of GHG emission reductions, the safeguarding principles assessment, SDG assessment, the monitoring frequency and data quality and/or potential risk.

All these key elements will be verified in a robust manner by the verification team of TUV NORD CERT GmbH.

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

The verification conducted is in accordance to the applied methodology, GS4GG Principles Requirements, TUV NORD Cert GMBH internal verification requirements. The deviation does not cause any impacts to the quantification of GHG emission reductions, the safeguarding principles assessment, SDG assessment, the monitoring frequency and data quality and/or potential risks.

### 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.)*