

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **20.05.2022**

Version **4.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 23/05/2022

1.2 | Decision

The request to accept the submission in accordance with “PRINCIPLES & REQUIREMENTS §4.1.49 (b)” is approved. The submission of documents (22/06/2021) where performed within one year of its start date (26/06/2020), the payment of the invoice (29/06/2021) was performed after ending the one-year deadline, nevertheless this deviation is approved.

The PD shall document the deviation request, its implications, and deviation decision in the appropriate section of the PDDs. The validating VVB shall, through appropriate means at its disposal, evaluate the Project’s evidence to confirm the above stated dates and provide its opinion in the Validation Reports. SustainCert shall review the same during certification reviews.

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_257	
Date of decision	23/05/2022	
Precedent (YES/NO)	NO	
Precedent details	-	
Date of submission	18/05/2022	
Project/PoA/VPA	Project	ID – GS11226 and 11225
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	TEKIRDAG BIOGAS and CORLU BIOGAS Plants	
Location of project/PoA/VPA	Host country(ies)	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale - Turkey <input type="checkbox"/> Small scale <input checked="" 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	Request for clarification	
Specify applicable rule/requirements/methodology and version number	PRINCIPLES & REQUIREMENTS 5.1.7	
Specify the monitoring period for which the request is valid (if applicable)	Start date	End date
Submitted by	Contact person name:	
	Email ID:kemal@gte.com.tr	
	Organisation: GTE KARBON	
	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 type="checkbox"/> If yes; VVB name: NA Auditor name:	

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):

Project has been submitted to SC for preliminary review on

Milestones are given below;

- 26/06/2020- Start Date of Project Activity (Gas Engine Agreement)
- 22/06/2021- Submission to GS for Preliminary Review
- 22/06/2021-Invoice by GS for Review (Due data 30/06/2021)
- 22/06/2021-Review Initiation Confirmation by SC
- 29/06/2021-Payment for Review Invoice
- 30/07/2021-First Round Review
- 11/03/2022-Second Round Review
- 18/04/2022-Third Round Review

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

NA

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):

Project start date for the two projects are 26/06/2020 as per the gas engine agreements submitted to SC. Projects have been uploaded to the SC platform on 22/06/2021. Hence, within one year of start of the project activity.

Preliminary review has been initiated and Preliminary review invoice has been sent in the same date (22/06/2021) with due date 30/06/2021. Payment has been made on 29/06/2021 and preliminary review has started.

After third round review of the project on 30/04/2022, we have received email from SC (Annyta Lou) that one year rule is not met (since by mistake we have written start date as 20/06/2020 in PDD). We have corrected PDD and sent evidences (agreements for gas engine dated 26/06/2020).

After this clarification, we have received another comment on 10/05/2022, after one year of submission of documents and initiation of review as below. We have been requested to submit deviation due to the highlighted rule below and since T&C and cover letter is not submitted, project is evaluated as "not eligible" after three rounds and one year.

However, the rule referred is different in the requirement and given as below and Preliminary review has already started (and three round has been completed already). Hence, the rule referred by SC is not same as given in the requirement below and since review has already started, this has already been cleared.

Besides, since the documents can not be tracked in the registry due to IT, we can not prove when the documents are uploaded. On 11/07/2021, we have sent email to GS and notified that document are not visible in the registry. Registry admin has later confirmed that documents are visible to them.

On 08/03/2022, we have received email from SC about third project of same investor that "documents disappeared due to IT issues" as per the email below. Hence, the IT system is also not reliable.

In recent and all similar projects, missing ODA, etc has never been an issue to reject a project. In such cases, we have uploaded the missing document before project is "listed" upon comment of SC/GS. Now for those projects, a new rule is fabricated retroactively and in an inconsistent manner with requirements itself. Rule is distorted and as you can also see from annexes (screenshot of the registry) , documents seems "completed" in the registry. Raising this comment after one year and stating

that the deadline is missed does not leave us any option to send those documents again.

Although the review has been initiated and three round has bene completed, it has appeared in last round that preliminary review payment has been made on 29/06/2021 , whereas the deadline is 26/06/2021 as per the one year rule. Since the due date of invoice was 30/06/2021 and in previous projects, it has not been an issue, we request deviation for the implementation of one year rule to be able to proceed with the listing and the registration of the project.

5.1.7 The Preliminary Assessment starts when the Project Developer has:

- (a) signed and submitted the [Terms and Conditions](#) AND
- (b) submitted the Project Documentation AND
- (c) paid the [fee](#) for the Preliminary Review, where required.

Hi Kemal,

To avoid another round, I communicate the remaining issue by email here.

- Project start date: 26 June 2020
- PDD first uploaded on 22 June 2021
- Terms and condition signed on 12.01.2022 and uploaded on 22.03.2022
- When did you pay preliminary review fee? [@Finance](#)

Preliminary review submission is considered 'submitted' when the Project Developer has: (a) signed and submitted the Terms and Conditions AND (b) submitted the Project Documentation AND (c) paid the fee for the Preliminary Review, where required (para 5.1.7, Principles and Requirements)

Retroactive Projects shall submit for Preliminary Review within one year of the Project Start Date. This requirement is not met for GS11225/6.

Best,

Annyta Luo

Certification Director-Energy

Email annyta.luo@sustain-cert.com

sustain-cert.com

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

NA

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):

Project has been submitted on time and all requested documents have been uploaded as requested.

We have responded all comments raised in three rounds and each time received new comments/reasons to delay the completion of the project.

In annexes, you'll see evidence submitted. Project is in line GS requirements and eligible project types, and will not have any negative impact in terms of SDG etc.

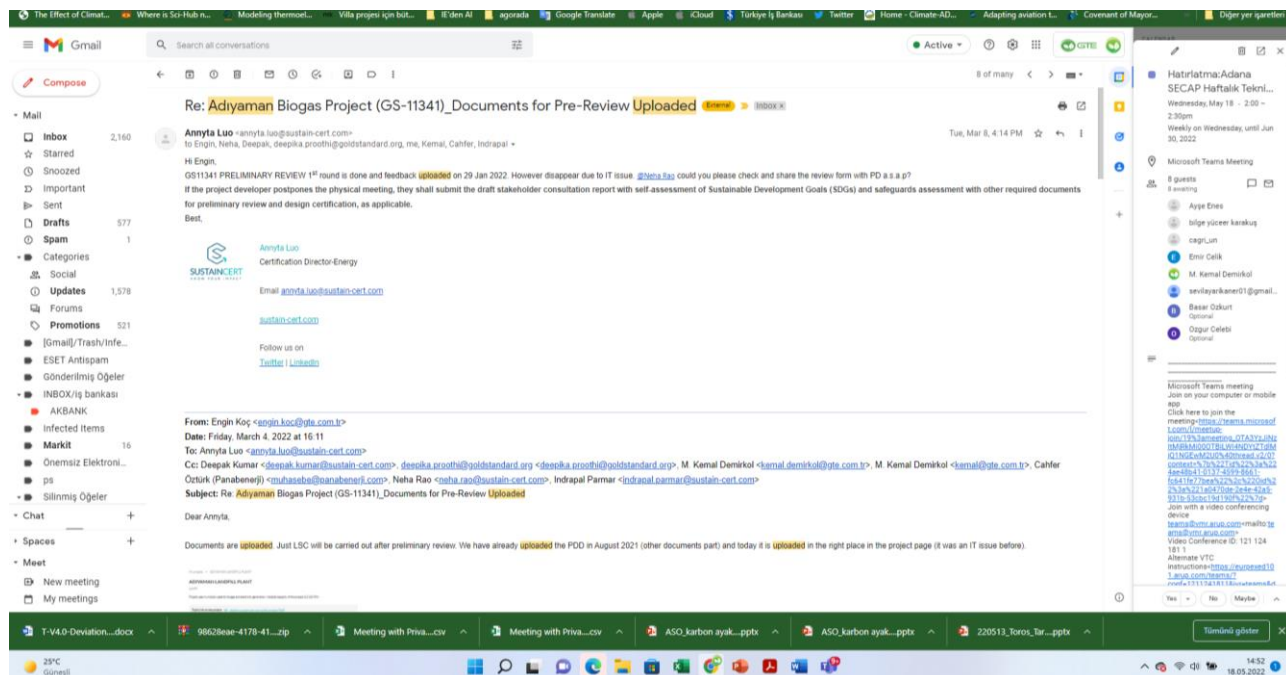
3.3.2 | VVB opinion (to be completed by VVB, if applicable):

NA

3.4 | Documents:

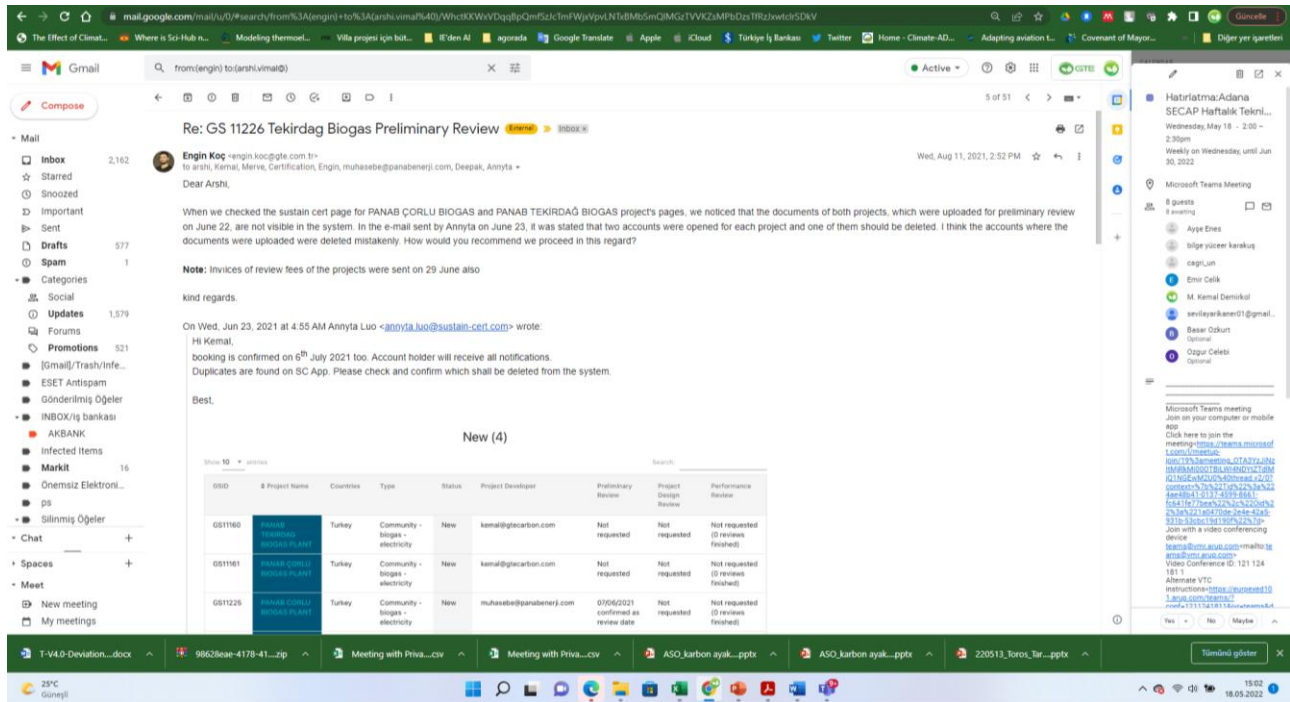
**Guidance* List of documents provided (note that once a decision has been made by Gold Standard, this deviation form along with supporting documents will be made public on the Gold Standard website. If any of the supporting documents are confidential, please indicate here to ensure they are omitted.)*

- **Annex 1- Email about documents disappeared for another project of same investor**



- **Annex 2-Email about visibility of documents uploaded to the registry**

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- **Annex 3- Screenshot of the SC platform showing documents are complete.**

