

TEMPLATE

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2021**

Version **5.0**

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## A. To be completed by Gold Standard

### 1| Decision

**1.1 | Date – 19/07/2022**

#### **1.2 | Decision**

The deviation request is not approved. The PD shall ensure that:

1. The start date of the monitoring period shall be not more than three years before the date of remote/physical site visit by a VVB. For example, as the current site visit is concluded on 30/05/2021, the MP cannot start before 30/05/2018 (inclusive) and the PD can claim the credits starting 30/05/2018.
2. A continuity in the Project's monitoring activities is maintained and PD is able to 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 \(version 1.2\)](#) and overarching GS principles (as applicable).

It shall be noted that the design certification date is 03/01/2018 i.e., the last day of the 6-week design review period, it doesn't have bearing on current site visit and eligible monitoring period. Also, the final closure of the review doesn't have implication on design certification date as also mentioned under para 5.1.23 of the [Principles and Requirements](#).

The PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS 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 provides its opinion in the Verification Report.

SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

**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_268	
Date of decision	19/07/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	04/05/2022	
Project/PoA/VPA	Project	ID – GS4822
	PoA	ID – GSXXXX
	VPA	ID – GSXXXX
Project/PoA/VPA title	Barroso 20MW hydroelectric project	
Date of listing	31/12/2017	
GS Standard version applicable	2.2	
Date of transition to GS4GG (if applicable)	23/05/2022	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not applicable	
Date of design certification/inclusion (if applicable)	02/01/2018	
Location of project/PoA/VPA	Colombia	
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	<a href="https://registry.goldstandard.org/projects/details/854">https://registry.goldstandard.org/projects/details/854</a>	
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	GS4822 First Monitoring Period – Temporary Deviation from site visit requirements and procedures.	
Specify applicable rule/requirements/methodology with exact paragraph reference and version number	SITE VISIT AND REMOTE AUDIT REQUIREMENTS AND PROCEDURES, version 1.0, November 17, 2021, paragraph 3.1, section 3.1.1.	

Specify the monitoring period for which the request is valid (if applicable)	Start date 29/01/2016      End date 29/01/2021
Submitted by	Contact person name: Francisco Charry
	Email ID: Francisco.charry@ebt.com.co (admin@ebt.com.co)
	Organisation: EBT SAS
	Project participant: Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/>  If yes; VVB name: TÜV NORD CERT  Auditor name: Raul Mitre
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:

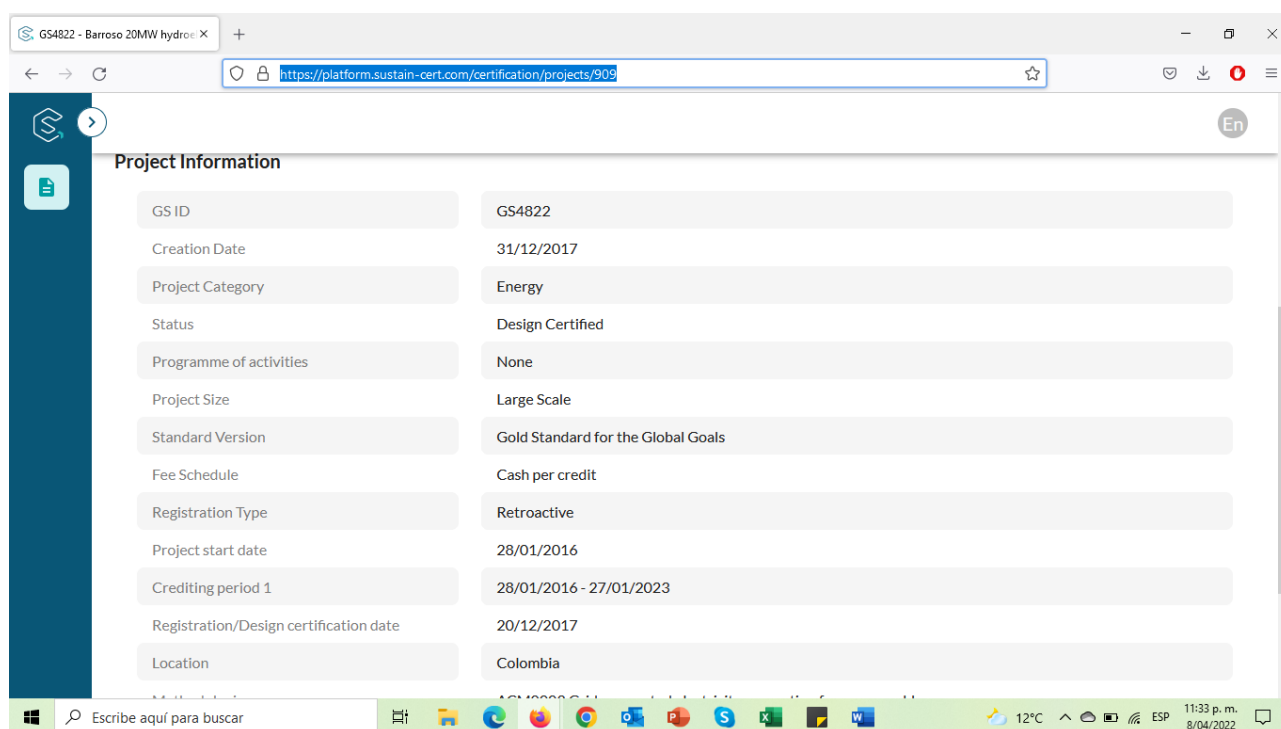
*\*Guidance\* Use the space below to describe the deviation and substantiate the reason for requesting deviation from applicable rules/requirements. Please include all relevant information in support of the request. You are requested to follow the principles for requesting deviations, given in the [Deviation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

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

As per the requirements of the Core Document - Site visit and remote audit requirements and procedures, version 1.0, August 16, 2021, section 3 - Minimum physical site visit requirements, paragraph 3.1 - Frequency of physical site visits "3.1.1. At minimum, the VVB shall conduct physical site visit: a. Within two years of project start date; and b. Once every three years after the first physical site visit", and paragraph 3.2 – Audit events, "3.2.2. A physical site visit by VVB is mandatory at the first verification of a project."

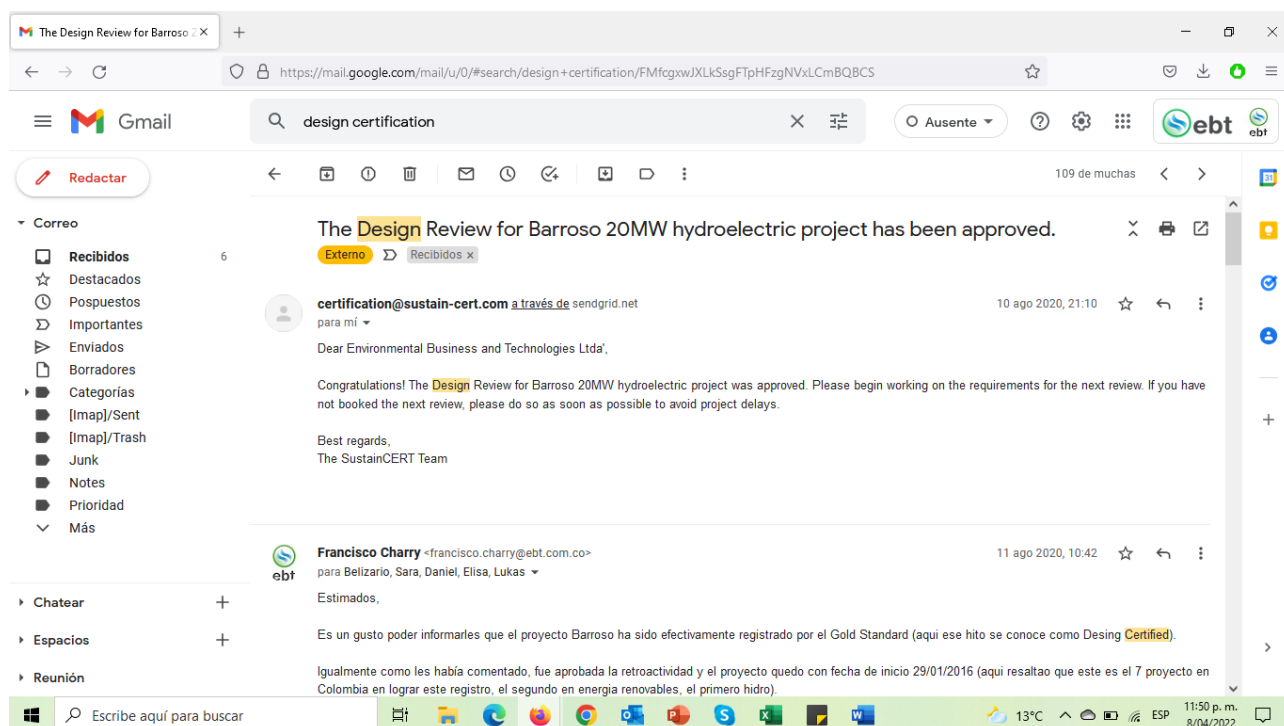
For the GS4822 project, the start date is 28/01/2016<sup>1</sup>, and corresponds also to the start date of the first crediting period. For the first verification covering the monitoring period from 29/01/2016 to 29/01/2021, the on-site visit was carried out by TUV NORD on 03/05/2021, thus the time frame between the project start date and the onsite visit is 5 years, 3 months and 4 days approximately.

It is important to note that according to the Performance Review report issued by SustianCERT, the reviewers indicated that the on-site visit was carried out after 2 years from the start date of the project and considering that the Project Design Certification of the project GS4822 was on 03/01/2018; however, this information is not consistent with the information indicated in the SustainCERT platform which reports that Registration/Design Certification Date was on 20/12/2017 as it can be seen in the following screen shot of the GS4822 project's account.



In addition to the above (difference in the project registration dates information between the Performance Review Report and the SustainCERT account), it should be noted that the approval of the Design Review for "Barroso 20MW hydroelectric project" was notified to the project proponent on 10/08/2020; Reference to the email from SustainCERT certification team shown below.

<sup>1</sup> This date can be confirmed at SustainCERT platform (<https://platform.sustain-cert.com/certification/projects/909>)



Due to the difference in the dates of the project Design Certification approval and the fact that according to the communication from SustainCERT just in August 2020, the effective project registration/design was approved, for the project proponent was not possible to schedule the first verification before said date (including the site visit, within the 2 years established in the procedure that was released in a date after the start of the verification). It should be noted that the verification of the project started right after the notification of registration/design approval and therefore the on-site visit took place a few months after the start of the verification.

For the reasons above, this temporary deviation is exclusively applicable to the first monitoring period, specifically to the verified period; therefore, the duration of the deviation is from 29/01/2016 to 29/01/2021, and after this, the subsequent verifications will be at least every three years.

### Relevant dates for project activities are as follows:

10/09/2009: Signature of Engineering, Procurement, and Construction contract

01/10/2009: Project construction begins

28/06/2010 Loan agreements signed between banks and the project developer

21/12/2010: The local DNA emitted the Letter of Approval for "Barroso 20MW hydroelectric project".

27/07/2011: The CDM validation process begins with the DOE Perry Johnson Registrars.

30/11/2012: Project full commissioning

01/02/2013: Project owner signed a VER Purchase Agreement with Allcot Group to move the project under Gold Standard.

15/01/2016: TUV NORD starts validation

26/02/2016: Project submitted for Pre-Feasibility Assessment under GS Version 2.2 CER

26/05/2016: finalization of the Pre-Feasibility Assessment under GS Version 2.2 CER

18/10/2017: Completion of project validation by TUV NORD

23/11/2017: Registration Review Started by GS (initial submission)

03/01/2018: Project Design Certification approved under GS (information not available to the PP until notification in August 10,2020).

04/01/2018: GS Feedback - First round (starting of 6 Wk review - Registration)

19/09/2018: Notification of project response uploaded in the new GS registry system (all under review)

12/10/2018: GS second round (starting of 6 Wk review - Registration)

10/11/2018: GS second review end date

10/12/2018: New feedback uploaded by GS

05/11/2019: Notification of project response to the findings raised during review.

05/11/2019: GS third round (starting of 6 Wk review - Registration)

11/12/2019: GS third review end date

21/11/2019: New feedback uploaded by GS

23/07/2020: Notification of project response to the findings raised during review.

28/07/2020: GS fourth round (starting of 6 Wk review - Registration)

30/07/2020: GS Notification of the review closure and indication to upload documents in SC App

10/08/2020: Notification of the Project Design Review approval.

23/02/2021: Approval of the verification proposal of TUV NORD



13/01/2021: Monitoring report preparation (version 1)  
 10/10/2021: Confirmation of GS regarding transition review initiation  
 25/10/2021: Confirmation of GS regarding performance review initiation  
 27/01/2022: GS second round performance review confirmation  
 10/03/2022: Transition review closed  
 23/05/2022: GS third round performance review confirmation  
 04/05/2022: Deviation request submitted to GS

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

Proper clarification and evidence were provided. The deviation description provided by the PP is transparent and clear to provide enough understanding to the reader. No discrepancies are found in such description.

### 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):

Due to the differences in dates and the late approval of the project registration/design, it was impossible to arrange the verification according with the requirements. In order to follow the spirit of the requirement, the verification service was contracted with TUV, immediately after SustainCERT confirmation of the registration/design approval.

Despite the additional time to reach approval, resources were deployed to collect data and information to monitor all parameters included in the project, to provide the most representative and comprehensive monitoring results possible. The intention of this action is to ensure that project activity represents a positive impact in the influence area.

It is important to include this period as part of the monitoring in order for the project to comply with their purpose of contribution with the wellbeing in the area, and to

account for the mitigation results achieved. The intention of the project's monitoring system is to provide a complete, transparent, and conservative data set that is representative of the project reality in field in all moments during the entire time.

The decision to include the entire monitored period despite the requirement of happening within 2 years of the project start date, is in line with the Rule Update - APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB, section 2.1 - Validate the reason for gaps in site visit , paragraph 2.1.1, which establish that reason for non-compliance with site visit requirements could be a caused by a Force Majeure or a Non-Force Majeure, considering as a valid reason "an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable".

Alternative monitoring arrangements for the monitoring period were evaluated, however, the relevance to verify data for the entire monitoring period was based on the availability, ability, and the capacity of the VVB.

The alternative solution to meeting the site visit time requirement would be to consider the monitored period from 2 year prior to the site visit, but a movement of this magnitude is unreasonable for projects whose timeline has implications on a variety of stakeholders, due to engagement with communities, and other requirements and social and environmental investments made in the area. Internal projections, goals, and plans are defined based on the external commitment with stakeholders, which are directly related to the timeline of the project.

In addition, from the beginning of the project and throughout the period, resources were deployed to comply with the community agreements and the socio-environmental investment plan, thus, the collection of data and information according to the monitoring plan, turned out to be the best solution available for the project, following like this, the spirit of the requirement based on what was feasible.

This temporary deviation is exclusively applicable to the first monitoring period, applied to the data and information collected from 29/01/2016 to 29/01/2021. Data and information onwards will be assessed in subsequent verifications at least every three years.

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

1. Clarification was provided by the PP regarding the reasons behind why the projects has been never verified. As the Design Review of the project activity by the Gold Standard was approved only till August 10, 2020. The e-mail from Sustain Cert was provided. Therefore, the project could not be verified on a previous date. The PP is requesting a deviation covering the first monitoring period only from 29/01/2016 to 29/01/2021. This request for deviation is in line with the applicable Rule Update applicability of minimum site visit requirements by VVB, section 2.1 - Validate the reason for gaps in site visit, paragraph 2.1.1, which establishes the reasons for non-compliance with the site visit requirements could be caused by mayor force, considering as a valid reason "an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable". This justification is considered appropriate by the verification team.

### 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 temporary deviation to consider the entire monitored period, does not have an impact on the project operation and monitoring. There is no identified impact on the project design, safeguarding principles, monitoring frequency, data quality, or potential risks.

There is no possibility that the result of this deviation has a negative impact on the SDGs of the project and on the contrary, as the developed verification shows, there is a positive impact on SDG1 (No Poverty), SDG7 (Affordable and Clean Energy), SDG8 (Decent Work and Economic Growth) and SDG13 (Climate Action), for the fulfillment of objectives and goals in social, environmental and mitigation matters.

Finally, there is no impact identified for this monitoring period. However, if there happens to be any impact on the project outcome because of this deviation, it will be assessed and discounted at future verifications.

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

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 is not visible. The project fulfills all requirements and approved documents. The deviation is caused by a reason beyond the control of the PP.

### 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.)*

**CONFIDENTIAL** – SustainCERT Document\_GS4822\_PERFORMANCE REVIEW  
REPORT\_21022022.doc

Verification and Certification Report\_ 2022\_01\_18\_FVR\_Barroso\_GS\_VER.

Monitoring Report \_ 031221 BARROSO\_GS Monitoring Report-V4 CLEAN.pdf

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