

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2022**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 20/09/2022

1.2 | Decision

The deviation approval is subject to successful compliance with the following requirement –

- a. The PD shall submit the documentation for Design Certification Renewal along with the VVB opinion latest by 31st December, 2022 to SustainCert.

If the PD complies with above-mentioned condition, then they are allowed to claim credits from end date of the 2nd crediting period . In case the documentation does not get submitted within the deadline then the PD will not be allowed to claim for the gap period.

The validating VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned condition and provide its opinion in the Validation 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_300	
Date of decision	20/09/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	22/08/2022	
Project/PoA/VPA	Project	ID – GS567
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Amayo 40 MW Wind Power Project – Nicaragua	
Date of listing	August 27th, 2010 (GS Registration Date) April 12th, 2009 (CDM Registration Date)	
GS Standard version applicable	Gold Standard for the Global Goals	
Date of transition to GS4GG (if applicable)	July 19th, 2021	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	May 02 nd , 2022 (date of transition from GS CDM to GS VER stream)	
Date of design certification/inclusion (if applicable)	August 27th, 2010	
Location of project/PoA/VPA	Nicaragua	
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/1002	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project	
Title/subject of deviation	Continuity for the gap period between end date of 5 years crediting period and renewal request.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Principles and Requirements, version 1.2 Paragraph 5.1.45	

Specify the monitoring period for which the request is valid (if applicable)	<p>Start date 12/04/2021 End date 01/04/2023</p> <p>The project request continuity for this monitoring period.</p> <p>The start date is the date before the 2nd crediting period ends under the 5 years length.</p> <p>The end date is the expected date when the project expects to request the renewal (7 months estimated to complete the re-validation)</p>
Submitted by	Contact person name: Martin Schaffer
	Email ID: martin.schaffer@inkiaenergy.com
	Organisation: Consorcio Eólico Amayo, S.A.
	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).	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes; VVB name:</p> <p>VVB Staff name(s):</p>
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):

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Based on the decision received on the deviation submitted by the project previously (T-V5.0-Deviation-Request-Form AMAYO I GS567.pdf, dated 28/07/2022). We confirm of receipt the decisions on the deviation requested. The project will follow the 5 years crediting period in the terms detailed below:

		Amayo I
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Crediting Period	status	Terms	Number of years
1	completed	12 Apr 09 - 11 Apr 16	7
2	on-going	12 Apr 16 - 11 Apr 21	5
3	Renewal to be requested	12 Apr 21 - 11 Apr 24	3
Total years allowed under GS4GG			15

In this regard, the project will have a delay between the last date (11 Apr 21) of 2nd crediting period (current period) and the completion of the re-validation, tentatively to be completed on 01 Apr 23 (estimating 7 months for completing this step). Following these dates, the remaining period eligible to claim VERs from the 3rd crediting period will be approximate only one year (e.g. from 01 Apr 23 to 11 Apr 24). This is following paragraph 5.1.46 of the GS Principles and Requirements v1.2.

As mentioned before, we are keen to move forward immediately with the re-validation in order to reduce as much as possible the delay to request the renewal. In this regard, we don't want to omit the fact that the decision from the GS to have the length of the 2nd crediting period of 5 years because the migration from GS CDM to GS VER stream didn't give chance for the project to anticipate the renewal on time because the migration was completed only on 02 May 2022, this is after the last date of the crediting period (11 Apr 21) under the length of 5 years imposed by GS due to the migration of stream. We want to stress the fact there was no neglect/inattention in the process from our side, but ambiguity in the rules from transitioned projects from GS CDM to GS VER stream.

On the other hand, the FAQs (see image below) relating how crediting period applied to projects that have completed 5 of the 7 years crediting period for transitioned CDM projects includes the option to request a maximum of 2 years of retroactive issuance (see image below). This approach is applied for pure CDM projects transitioning to GS certification, which gives the impression those projects have an advantage over the already certified GS CDM projects that migrated to the GS VER stream as in the case of project Amayo I (GS567). Therefore, we request GS to allow claiming the retroactive period between the end date of the 2nd crediting period and the date of submission to request the renewal for Amayo I project (GS567), with the condition the project should proceed with the renewal and limit the retroactive period up to two years.



Image 1. FAQ from SC Helpdesk – Retroactive issuance for project already completed 5 of 7-year crediting period.

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.*

Not applicable

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 project

The project AMAYO I (GS ID 567) has been successfully Gold Standard certified since 2010. The requested approach bears no risk for detriment to GS and has no bearing whatsoever on the total emission reductions to be claimed, as these do not seek to claim GS-VERs longer than the 15 years maximum. Since this flexibility for retroactive crediting is allowed for CDM projects that never had before a GS certification, we consider adequate that this flexibility is granted as well to the project that has been aligned with the standard rules since its registration in 2010.

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.*

Not applicable

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):

No impact envisaged on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. This is just about the reasonable timing to complete the renewal. It was not possible for the project to anticipate the renewal under the 5 years period, because that end date (11/04/2021) of 5 years-period was before the date of completion the transition from GS CDM to GS VER stream (19/07/2021). Furthermore, when the project completed the stream transition, no comments/requests were raised about length of crediting period, not about need of urgent renewal. The head-ups on that regard came in the form of an email from GS (see email below) received on 25/05/2022, indicating the need for renewal because the end date of the crediting period was considered overdue because the transition to the VER stream. Therefore, it was not possible for the project to avoid the gap between the end date of the 5 years crediting period and the request of the renewal.

Sent: Wednesday, May 25, 2022 8:26 AM

To: Xochilt Martinez <Xochilt.Martinez@inkiaenergy.com>; Platform Support <platformsupport@sustain-cert.com>

C: Martin Schaffer <Martin.Schaffer@inkiaenergy.com>; Mariana Barrios <barriosjackman@gmail.com>; Tanvi Bongale <tanvi.bongale@sustain-cert.com>; Keith Black <keith.black@goldstandard.org>; Sandeep Kanda <sandeepkanda.consultant@sustain-cert.com>; deepika.proothi@goldstandard.org

Subject: Re: Delays Communication

Dear Xochilt,

1. Performance review NO.7 is approved. You can book PR NO.8 now. If continue problem, please contact @Platform Support for help.
2. To avoid double counting, unique ID but GS stream is updated to GS VER now.

Kindly notice Transition project, PoA/CPAs shall follow GS4GG certification cycle for crediting period **renewal** (e.g. 5 years) in order to issue or convert issued emission reductions to GSVERs under GS4GG.

GS567 CP2 ends on 11 Apr 2021 (please contract VVB for re validation a.s.a.p)

GS828 CP2 ends on 30 Sep 2023

Best,



Annyta Luo
Certification Director-Energy

Email annyta.luo@sustain-cert.com

sustain-cert.com

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Image 2. Email from GS indicating the end date of crediting period and need for re-validation.

As mentioned before, there is no negative effect identified in this deviation. Since this flexibility is allowed for CDM project transitioning to GS VER, we believe the application of this rule to the project will not affect the integrity.

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.*

Not required

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.)*

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> - date of listing, design certification, transition - standard version

		<ul style="list-style-type: none"> - specific reference to a requirement deviated from - any previous deviations/design changes approved <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption