

TEMPLATE

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2022**

Version **5.0**

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## A. To be completed by Gold Standard

### 1 | Decision

**1.1 | Date – 29/09/2022**

**1.2 | Decision**

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

- i. Document the deviation request, its implications, and GS' decision in the appropriate section of the Verification Report (for the relevant MP).
- ii. 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_308	
Date of decision	29/09/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	13/09/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input checked="" type="checkbox"/> VPA	ID – GS7531
Project/PoA/VPA title	DURABRIC Bricks Project by 14 Trees in Malawi: VPA 01 (GS 7531)	
Date of listing	NA	
GS Standard version applicable	Gold Standard for The Global Goals (GS4GG) Requirements (version 1.2)	
Date of transition to GS4GG (if applicable)	NA	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	NA	
Date of design certification/inclusion (if applicable)	20/07/2020	
Location of project/PoA/VPA	Malawi	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://registry.goldstandard.org/projects/details/1969">https://registry.goldstandard.org/projects/details/1969</a>	
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	Deviation request for verification team for performance certification	
Specify applicable rule/requirements/methodology	Rule Update: Validation and Verification by same VVB (RU 2020 PR – PR V1.2)	

gy, with exact paragraph reference and version number	
Specify the monitoring period for which the request is valid (if applicable)	Start date:01/11/2019      End date: 31/12/2020
Submitted by	Contact person name: Vikash Kumar Singh
	Email ID: vikash@carboncheck.co.in
	Organization: Carbon Check (India) Private Ltd.
	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: Organization: Carbon Check (India) Private Ltd.  VVB Staff name(s): Sanjay Kumar Agarwalla
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):

During the second periodic verification, the following finding has been raised by SC under Comment 8, issue 3:

“The validation, 1st verification and 2nd verification of the VPA was conducted by the same VVB (Carbon Check). Further the entire verification team was not different from the validation team that performed validation activity. Hence the VVB shall clarify as how the integrity and impartiality of the verification audit was maintained inline with the “Rule Update: Validation and Verification by same VVB (RU 2020 PR – PR V1.2)”. Clarify.”

VVB justification:

We thank SC for highlighting this concern and we believe that a clarity must be established between SC and VVB on this critical aspect.

We understood the concern is due to the fact that technical reviewer of the (combined design & previous performance certification) is now assessment team leader of this performance certification. Further the Technical Expert during the last verification is now the 'Expert to the TR' during this current verification. We also understand that continuation of the local expert is also forms a concern in the same regards as he continues during this assessment as well. We would like to provide our submission on the requirements along with Carbon Check's view on this issue.

The verification team during combined design & previous performance certification was as provided below:

Team Leader: Anubhav Dimri

Technical expert to TL: Vikash Kumar Singh

Local Expert: Priscilla Kumwima

Independent Technical Reviewer for validation and first verification: Sanjay Kumar Agarwalla

Verification team during the 2nd periodic verification:

Team Leader and technical expert: Sanjay Kumar Agarwalla

Local Expert: Priscilla Kumwima

Independent Technical Reviewer: C Indumathi

Technical expert to TR: Vikash Kumar Singh

In our opinion the change of team as cited in the GS4GG is to avoid either familiarity or self-review thereat. As per ISO 17029:2019:

"Familiarity (or trust) : threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evidence for validation / verification."

"Self-review: threats that arise from a person or body reviewing the work done by themselves."

In the background above, we wish to confirm here that an internal technical reviewer (also called as independent reviewer) is always for the inspection of the project validation and verification team and never deemed as part of the “team” and does not even communicate with the client. This interpretation is also testified as per definition of ISO 14065:2020:

“independent reviewer

competent person, who is not a member of the validation/verification team (3.3.7), who reviews the verification (3.3.15) or validation (3.3.16) activities and conclusions”

Based on the justification above, it is clearly established that use of an individual (who was previously an independent reviewer for a project) is not a violation of the cited GS4GG requirement. In regard to a local expert, the role is very limited for interpretation purpose only under strict supervision of the assessment team leader. We believe that use of same local (rather language) expert is also not a violation of the GS4GG rules and does not also constitute a familiarity/self review threat. We have our own way to cross-check interpretation done by the local expert and thus ensure any impartiality threat.

Furthermore, we would like to submit that Independent technical reviewer is not a part of the previous verification (C Indumathi). However, with regards to the concern raised by SC for technical expert to the team in the first verification being technical expert to TR during the current verification, we have changed the same and got the project reviewed by Mr R V Nesari (technical expert to TR). After considering this, the team for second performance certification is as below:

Verification team during the 2nd periodic verification:

Team Leader and technical expert: Sanjay Kumar Agarwalla

Local Expert: Priscilla Kumwima

Independent Technical Reviewer: C Indumathi

Technical expert to TR: Mr R V Nesari

So, the only team member used for both combined design/performance certification and second performance certification is the local expert.

In light of the justification above VVB request GS to allow this deviation request for the use of same local expert (as involved in combined design/performance certification) for the second performance certification.

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

NA

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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### 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):

NA

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.*

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):

NA

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.*

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.)*

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