

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 – 26/10/2022

#### 1.2 | Decision

The deviation request is **approved**. The Project Developer may continue with the certification process.

The PD shall document the deviation request, its implications, and deviation decision in the appropriate section of the PDD.

The validating VVB shall, through appropriate means at its disposal, evaluate the information and provide its opinion in the Validation Report. Certification body 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_315	
Date of decision	26/10/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	29/07/2022	
Project/PoA/VPA	Project	ID – GS11662
	<input type="checkbox"/> PoA	n.a.
	<input type="checkbox"/> VPA	n.a.
Project/PoA/VPA title	Gazişehir LFG Utilization Project	
Date of listing	Under preliminary review	
GS Standard version applicable	Gold Standard for Global Goals Principles and Requirements version 1.2	
Date of transition to GS4GG (if applicable)	n.a.	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	n.a.	
Date of design certification/inclusion (if applicable)	n.a.	
Location of project/PoA/VPA	Turkey	
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://platform.sustain-cert.com/public-project/2909">https://platform.sustain-cert.com/public-project/2909</a>	
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	Deviation Request for GS11662 linked with paragraphs 4.1.49 (b) and 5.1.7 of Principles and Requirements (v1.2)	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	4.1.49.(b): Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date. Retroactive Project submitted at a	

	<p>date later than one year from the project start date will not be eligible for Gold Standard certification.</p> <p>&amp;</p> <p>5.1.7: The Preliminary Assessment <b>starts</b> when the Project Developer has:</p> <p>(a) signed and submitted the Terms and Conditions AND</p> <p>(b) submitted the Project Documentation AND</p> <p>(c) paid the fee for the Preliminary Review, where required.</p>
Specify the monitoring period for which the request is valid (if applicable)	<p>Start date n.a.                      End date n.a.</p>
Submitted by	<p>Contact person name: Ömer Akyürek</p> <p>Email ID: <a href="mailto:o.akyurek@outlook.com">o.akyurek@outlook.com</a></p> <p>Organisation: Gazişehir Enerji Üretim San. Ve Tic. Ltd.</p> <p>Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
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)?	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

### 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):

GS11662 Gazişehir LFG Utilization Project is a retroactive project activity since the Stakeholder Consultation is conducted after the start of project activity as defined under par 4.1.42 of Principles and Requirements.

The starting date of the project activity is determined as 11.05.2021 in line with the definitions and requirements of GS. PP has submitted **key project information** (as per par. 5.1.4) on 09.05.2022 in line with the 1 year rule (as per par. 4.1.49.(b)) however uploaded signed Terms and Conditions on 25.05.2022 and paid the fee for the preliminary review on 16.06.2022. Detailed timeline of the project activity is as follows:

Date	Action
14.02.2021	Prior Consideration
11.05.2021	Start of Project Activity
10.03.2022	LSC Meeting announcement
16.04.2022	LSC Meeting
9.05.2022	GS ID Creation Date (GS11662)
9.05.2022	Submission of Key Project Documentation
11.05.2022	Deadline for +1 year rule
25.05.2022	Terms and Conditions Upload
30.05.2022	Transfer of Sustain Cert Account
8.06.2022	Received invoice for GS11662
16.06.2022	Invoice Paid

With regards to communication (email) with Sustain Cert on 27.07.2022, PP was requested to clarify and send a deviation form addressing the following requirement:

*"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)"*

PP was also requested to provide clarification on date of fee payment.

The PP kindly requests that the project activity is considered in compliance with 4.1.49(b) and proceed with retroactive project cycle.

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.*

n.a.

### 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):

PP wishes to present the following main arguments for consideration to support a positive assessment outcome.

#### **Compliance with core principles and requirements of Gold Standard:**

Although administrative documents have been submitted to gold standard after 11.05.2022, key project information including the **draft PDD and Local Stakeholder Consultation Report** was submitted to Sustain Cert on a timely fashion. This assures compliance with par 4.1.49(b); par 5.1.1(a); par 5.1.3; par 5.1.4 and par 5.1.8 which require submission of Draft PDD and LSC report as key documents. This indicates strong evidence on prior consideration of the project activity and PP's dedication to receive GS registration.

#### **Requirement of Par. 5.1.7:**

PP interpretation on Par 5.1.7 of GS4GG Principles and Requirements was that it governs conditions on **when a Preliminary Review starts** within GS rather than providing a definition on "submission date" or a conditionality on submission is considered "submitted or not".

#### **Clarification on partial submission of documents to Sustain Cert:**

GS11662 was established on 09.05.2022 and is listed under the general account of CEV Enerji Üretim Sanayi ve Ticaret Limited Şirketi (CEV account). However CEV account was registered by a consultant company on behalf of project owner as a

practical solution to follow-up a issuance of another project. The need to transfer the main account to the project owner has caused PPs to upload documents partially. Key project documentation (LSC report and Darft PDD) was uploaded before solving the registry transfer to comply with 4.1.49. Please also take into account the above clarification on interpretation of the PP on Par. 5.1.7.

### **Delayed payment on Preliminary Review Fee.**

The payment can only be made by the PP once an invoice is issued by Sustain Cert. PP only received an invoice for GS11662 on 08.06.2022 which was immediately processed and paid on 16.06.2022.

Note: Although the Invoice date was 02.06.2022, this invoice was not received by the PP. An invoice was received on 02.06.2022 however it was for GS745. One possible reason for communication problems could have been the transfer of account and change in contact information.

The PP kindly requests that the project activity is considered in compliance with 4.1.49(b) despite submission of administrative documents and requirements (signed T&C and invoice payment) were not satisfied.

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.*

n.a.

### **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 will not result in any impact on environmental integrity, SGDs, safeguard principles and/or contradict with local regulations.

### Environmental Integrity:

Proposed deviation will not lead to overestimated ERs, and conservativeness be ensured.

### Contribution to Sustainable Goals (SDGs):

The proposed deviation does not have any impact on contribution of Project Activity to SDGs.

### Safeguarding Principles and Requirements:

The proposed deviation does not have any impact on safeguarding principles and requirements.

### Compliance with Hot Country Regulations:

The proposed deviation is not linked with any of the host country regulations.

### 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.*

n.a.

### 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	<p>Additional information added:</p> <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> <p>Guidance on VVB opinion</p>
4	14.01.2021	



3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption