

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 – 25/01/2023

#### 1.2 | Decision

**Deviation 1:** Deviation request is approved. Project Developer does not need to submit the annual report for monitoring period 01/01/2018- 31/12/2020 and 01/01/2021-30/06/2021.

**Deviation 2:** Deviation request is approved. Project Developer may claim GSCERs for monitoring period 01/01/2018- 30/06/2021.

In addition to this, Project Developer shall ensure the following:

1. A continuity in the Project's monitoring activities is maintained and Project Developer 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 1.1) and overarching GS principles (as applicable).

2. The Project Developer 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 two 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_362	
Date of decision	25/01/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	15/12/2022	
Project/PoA/VPA	Project	ID – GS4300
	<input type="checkbox"/> PoA	ID – GSXXXX - NA
	<input type="checkbox"/> VPA	ID – GSXXXX - NA
Project/PoA/VPA title	Mampuri Wind Power Project	
Date of listing	20/07/2022	
GS Standard version applicable	TRANSITION REQUIREMENTS Version 2.0 Dated 16/08/2021	
Date of transition to GS4GG (if applicable)	06/04/2022	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	NA	
Date of design certification/inclusion (if applicable)	04/08/2012	
Location of project/PoA/VPA	Host country – Sri Lanka	
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://platform.sustain-cert.com/public-project/786">https://platform.sustain-cert.com/public-project/786</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 related to Retroactive Submission of Annual Report and VVB Follow-up Site Visit date consideration in light of the Force Majeure events being Covid scenario and Sri-Lanka crisis scenario	
Specify applicable rule/requirements/methodology,	<b>Deviation 1:</b> Transition review: FAR#1: In-line with GS4GG Principles and Requirements, VVB	

<p>with exact paragraph reference and version number</p>	<p>and PP shall consider the following rules after the Transition is finalized:</p> <p>5.1.39: Transparent, annual update reports need to be provided for Projects that have achieved the Project Design Certification stage or have successfully transitioned to Gold Standard for the Global Goals. An annual report shall be submitted for each monitoring year by end of next calendar year for which verification is not completed. If a verification is in progress but not completed, then an Annual Report is still required by the end of calendar year.</p> <p>Source: Transition Review for the Project attached; PRINCIPLES &amp; REQUIREMENTS Version 1.2 Published October 2019; Paragraph 5.1.39.</p> <p>Further as per the TRANSITION REQUIREMENTS version 2.0 dated 16/08/2022, Paragraph 3.1.2   All projects <b>after transition to GS4GG</b> shall comply with annual reporting requirements defined in section 3.4.9.1 of Principles &amp; Requirements</p> <p>-----</p> <p>Deviation 2:</p> <p>2.2   Deviation approval 2.2.1   VVB may approve such deviation as per the following paragraphs.</p> <p>2.2.3   Follow-up site visits – In case follow-up site visits are not conducted within three years after the previous site visit, and the delays were due to: i. Force Majeure, the VVB shall submit a request for deviation to Gold Standard. ii. Non-Force Majeure, the VVB shall not verify the monitoring period falling before three years of the site visit date. Under similar circumstances for GSCERs projects, CERs only for three years before the site visit date shall be labelled as GSCERs. 2.2.4   The project may have more than two years (first site visit) or three years (follow up site visit) of monitoring periods before the site visit date, the remaining years of the retroactive periods will be foregone without any extension of crediting period.</p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>Start date 01/01/2018      End date 30/06/2021</p>

Submitted by	Contact person name: Ms. Pancherine Dias Email ID: dias@senoksl.com
	Organisation: Senok Wind Power (Pvt) Ltd.
	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 checked="" type="checkbox"/> No <input type="checkbox"/> If yes; VVB name: KBS Certification Services Pvt. Ltd. VVB Staff name(s): Shikha Sharma (Manager Validation and Verification- Team Leader and Technical Expert for the project)
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):

##### **Deviation 1:**

As per the Transition review (enclosed as attachment): FAR#1: In-line with GS4GG Principles and Requirements, VVB and PP shall consider the following rules **after the Transition is finalized**: 5.1.39: Transparent, annual update reports need to be provided for Projects that have achieved the Project Design Certification stage or have successfully transitioned to Gold Standard for the Global Goals. An annual report shall be submitted for each monitoring year **by end of next calendar year** for which verification is not completed. If a verification is in progress but not completed, then an Annual Report is still required by the end of calendar year.

Further, as per the TRANSITION REQUIREMENTS version 2.0 dated 16/08/2022, Paragraph 3.1.2 | **All projects after transition to GS4GG** shall comply with annual reporting requirements defined in section 3.4.9.1 of Principles & Requirements

It may please be noted that the project has successfully transitioned to Gold Standard for the Global Goals and the GS4GG Transition Review was approved on 06/04/2022 wherein the FAR#1 was raised which required "An annual report shall be submitted for each monitoring year by end of next calendar year". The present monitoring period for which deviation is being sought are

- (a) For the monitoring period 01/01/2018- 31/12/2020: The FAR#1 **cannot be applied on a retroactive basis for the period (01/01/2018- 31/12/2020) since it was raised in the GS4GG Transition Review approved on 06/04/2022** and would be applicable as on 06/04/2022. Further as per the Transition Requirements version 2.0 dated 16/08/2022, Paragraph 13.1.2 | **All projects after transition to GS4GG** shall comply with annual reporting requirements. PP was awaiting GS4GG Transition Review approval before they could take up the activity of submission of annual reports. As soon as approval was received, PP and VVB completed the Verification Process and the Verification Report was uploaded 21/07/2022, within the calendar year (31/12/2022).
- (b) For the monitoring period, 01/01/2021-30/06/2021 the Annual Report would not be required since the GS MR and VVB Verification Report were completed and submitted on 21/07/2022 before the end of next calendar year (31/12/2022).

**PP would request the GS team to provide approval for the Deviation Request considering the above.**

### **Deviation 2:**

As per APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB Dated 16/08/2021, paragraph 2.2.3 | Follow-up site visits – In case follow-up site visits are not conducted within three years after the previous site visit, and the delays were due to: i. Force Majeure, **the VVB shall submit a request for deviation to Gold Standard.** ii. Non-Force Majeure, the VVB shall not verify the monitoring period falling before three years of the site visit date. Under similar circumstances for GSCERs projects, CERs only for three years before the site visit date shall be labelled as GSCERs. 2.2.4 | The project may have more than two years (first site visit) or three years (follow up site visit) of monitoring periods before the site visit date, the remaining years of the retroactive periods will be foregone without any extension of crediting period. PP has collated herein the key dates for consideration

Last Onsite Visit for CDM & GS, version 2.2 Verification Audit for the Monitoring period 01/01/2016 to 31/12/2017	21/02/2018 & 22/02/2018
CDM Remote Verification	07/09/2021 (remote audit through Zoom Virtual meet)
As per APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB dated 16/08/2021 paragraph 2.2.4   The project may have more than two years (first site visit) or <b><u>three years (follow up site visit) of monitoring periods before the site visit date</u></b>	Therefore, in line with the requirement the monitoring period that falls in this category would be 07/09/2018-30/06/21;
Deviation Request 2: In order to cover the period from 01/01/2018-06/09/2018 for issuance, the Follow up site visit was to be conducted before 31/12/2020 but it was conducted on 07/09/2021 (9 months later), however that was the peak of Covid 19 pandemic Period for both India (VVB and Consultant are based out of India – please refer to link	

<https://www.worldometers.info/coronavirus/country/india/>) and SriLanka (PP are based out of SriLanka

<https://www.worldometers.info/coronavirus/country/sri-lanka/> ). It may also be noted that the Covid-19 Interim Measures V1 was released on 04.04.2020, because the situation was limiting. **Additional supportive on SriLanka Circulars have been provided.**

Further SriLanka has been under tremendous crisis Caused by

- 2019 Sri Lanka Easter bombings
- COVID-19 pandemic in Sri Lanka
- Foreign exchange crisis

[https://en.wikipedia.org/wiki/2019%E2%80%93present\\_Sri\\_Lankan\\_economic\\_crisis](https://en.wikipedia.org/wiki/2019%E2%80%93present_Sri_Lankan_economic_crisis)

since April 2019 till date. Both these crises' events – the Covid Pandemic and the SriLanka Crisis fall under the Force-Majeure event wherein the event was beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable. Under these circumstances it was not possible to conduct the follow-up site visit. Therefore, we would request the GS Team to accept and approve the deviation for the issuance for the period 01/01/2018-07/09/2018.

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

Deviation 1:

**Verification team has checked deviation 1 elaborated above and confirms that the annual reports cannot be submitted on retroactive basis and as the project transitioned to GS4GG on 06/04/2022, PP shall submit the annual report by next calendar year as required by the TRANSITION REQUIREMENTS version 2.0 dated 16/08/2022, Paragraph 3.1.2**

Deviation 2:

**VVB confirms that follow up site visit although was to be conducted with 3 years of the previous site visit (21/02/2018 & 22/02/2018), however, the same was delayed for over 9 months (conducted on 07/09/2021 (remote audit through Zoom Virtual meet) and not carried out as per the requirement of the rule update. The delay in the site visit were due to force majeure considering the COVID-19 pandemic lockdown and travel restrictions in India and the crises explained above for Sri Lanka.**

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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):

Deviation 1: It may be noted that the deviation was beyond the control of the PP, primarily because the PP could not submit Annual Reports for the period

01/01/2018-31/12/2018	by 31/12/2019
01/01/2019-31/12/2019	by 31/12/2020
01/01/2020-31/12/2020	by 31/12/2021

in absence of GS4GG Transition Review Approval which was obtained on 06/04/2022. The Transition Requirements version 2.0 dated 16/08/2022, Paragraph 13.1.2 requires | **All projects after transition to GS4GG** shall comply with annual reporting requirements. The Verification Processes were initiated soon after GS Transition Review approval (06/04/2022) and the Verification report was submitted on 21/07/2022.

Deviation 2: **As per APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB Dated 16/08/2021, paragraph 2.2.3 | Follow-up site visits – In case follow-up site visits are not conducted within three years after the previous site visit, and the delays were due to: i. Force Majeure**, the VVB shall submit a request for deviation to Gold Standard.



In order to cover the period from 01/01/2018- 06/09/2018 for issuance, the Follow up site visit was to be conducted before 31/12/2020 but it was conducted on 07/09/2021 (9 months later), however that was the peak of Covid 19 pandemic Period for both India (VVB and Consultant are based out of India – please refer to link <https://www.worldometers.info/coronavirus/country/india/>) and SriLanka (PP are based out of SriLanka <https://www.worldometers.info/coronavirus/country/sri-lanka/> ). It may also be noted that the Covid-19 Interim Measures V1 was released on 04.04.2020, because the situation was limiting.

Further SriLanka has been under tremendous crisis Caused by

- 2019 Sri Lanka Easter bombings
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[https://en.wikipedia.org/wiki/2019%E2%80%93present\\_Sri\\_Lankan\\_economic\\_crisis](https://en.wikipedia.org/wiki/2019%E2%80%93present_Sri_Lankan_economic_crisis)

since April 2019 till date. Both these crises' events – the Covid Pandemic and the SriLanka Crisis fall under the Force-Majeure event wherein the event was beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable. Under these circumstances it was not possible to conduct the follow-up site visit. Therefore, we would request the GS Team to accept and approve the deviation for the issuance for the period 01/01/2018-07/09/2018.

We would like to clarify that all data (Import Export Invoices that lead to Emission Reduction calculations and other SDG Parameters) audited for the monitoring period were monitored by PP and supported by Third party data and was in line with the GS Passport, Registered PDD and GS Transition Annex Approval. The VVB Verification Report has been attached as reference for the same.

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

Deviation 1:

**Verification team confirms that PP shall submit the annual report by next calendar year as required by the TRANSITION REQUIREMENTS version 2.0 dated 16/08/2022, Paragraph 3.1.2**

Deviation 2:

**VVB confirms that follow up site visit although was not conducted within 3 years of the previous site visit (21/02/2018 & 22/02/2018), and the same was delayed for over 9 months (conducted on 07/09/2021 (remote audit through Zoom Virtual meet). As, the delay in the site visit were due to force majeure explained above and verification team carried out the assessment to ensure a reasonable level of assurance, by reviewing the entire set of data presented by the PP as well as cross check of the site records, regulatory documents, technical specifications, monitoring equipment, monitoring report, monitoring parameters, SDG parameters and monitoring plan. Hence, the deviation has been requested by PP to consider the entire monitoring period verified for the issuance 01/01/2018 – 30/06/2021 (including both days).**

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### 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):

All aspects of the project have been audited by the VVB and reviewed by the GS Team during the Performance Review process. There is no *impact of the deviations on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project*. The UNFCCC CDM Team has issued the CERs for 01/01/2018-31/12/2020 and the Provisional CERs for the monitoring period 01/01/2021-30/06/2021. The GS Team is in the process of GS-Labeling the issued CERs and issuing GSVERs for the Provisional CERs. The above Deviation 1 would curtail the monitoring period from 01/01/2018-30/06/2021 to 01/01/2021-30/06/2021). We would like once again to draw attention on the fact that the annual report requirements come for **"All projects after transition to GS4GG" which happened on 06/04/2022 for project case therefore we seek approval for the Deviation 1.**

Deviation 2 would curtail the monitoring period (from 01/01/2018-30/06/2021 to 01/10/2018-30/06/2021) that the quantum of CERs issued as per table below would be reduced and so would the associated GSCER sale revenue to the project will drop under such difficult times in Sri Lanka.

01/01/2018-01/10/2018	13,317
01/10/2018-31/12/2018	1,088
01/01/2019-31/12/2019	14,311
01/01/2020-31/12/2020	16,290
01/01/2021-30/06/2021	5599

We would like to once again to draw attention on the fact that the follow up site audit could not be accomplished before 31/12/2020 due to **Force Majeure** situation in SriLanka at that time, **therefore we seek approval for the Deviation 2.**

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

Deviation 1:

**Verification team would like to confirm that the impact of the deviation is not realised on the project design and its operation. It is also confirmed that the deviation is temporary in nature and PP shall submit the annual report by next calendar year as required by the TRANSITION REQUIREMENTS version 2.0 dated 16/08/2022, Paragraph 3.1.2.**

Deviation 2:

**As explained above in the assessment of deviation, a reasonable level of assurance was achieved during the verification and entire set of data was verified. Further, it has been confirmed that the deviation has had no impact on the project design, operation and monitoring. The assessment of all the monitoring and SDG parameters were covered in the verification opinion. Hence, the deviation requested by PP to consider the entire monitoring period verified for the issuance 01/01/2018 – 30/06/2021 (including both days).**

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### 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.)*

1. GS4GG Performance Review GS4300 Round 1 2022-10-11 [The 2 Deviation aspects have been highlighted in yellow]
2. GS Transition Review Approval
3. GS FVR Mampuri WPP Clean

4. Mampuri 1 ER Sheet GS

5. GS Mampuri 1 MR v2.1

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