

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 – 26/04/2023**

**1.2 | Decision**

The deviation request is partially approved. The VVB shall:

- a. Conduct a supplementary audit (remote audit may also be conducted) with a new team leader. VVB shall provide a proper justification in case a remote audit is not conducted. If findings suggest over-estimation of emission reduction, it shall be retrospectively adjusted in the first monitoring period of the second crediting period of the project activity. If the emission reduction is found to be underestimated, then no adjustment shall be made.
- b. Use an entirely different team for the next verification and shall not repeat any member that has been involved in any of the previous verifications.

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).

SustainCert shall review both the project developer'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**

The purpose of the project is to utilise the available renewable energy sources in the form of biomass received as a result from sludge treatment by the town of Sofia Municipality wastewater treatment plant, located in the Kubratovo (Kubratovo WWTP). Methane produced in Kubratovo WWTP is captured in common methane tanks (four digesters for anaerobic sludge treatment, each of 7,000m<sup>3</sup>) serving as a buffer and then supplied to the newly installed CHP gas engines (three co-generations sets with 1,063 kW electric capacity and 1,088 kW thermal capacity each) for electricity and heat production, which in turn will substitute both the plant's electricity purchases from the grid and diesel fuel usage. Excess electricity is supplied to the grid.

The main purpose of the project is to transform the existing low-tech sludge treatment process at Kubratovo WWTP that existed before implementation of the project into an advanced treatment process matching the best sludge treatment practice available. The project replaces the baseline sludge drying beds and landfill sludge options disposal with mesophilic digestion of all primary and secondary sludge followed by mechanical dewatering in order to reduce GHG emissions.

The project was successfully validated by RINA and registered by the GS as a retroactive GS VER project in 2016 year. On 13/11/2019 the transition to GS4GG Requirements was approved by GS.

Deviation Reference Number	DEV_388	
Date of decision	26/04/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	<b>27/03/2023</b>	
Project/PoA/VPA	<input checked="" type="checkbox"/> <b>Project</b>	<b>ID – GS4238</b>
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	<b>“Methane Gas Capture and Electricity Production at Kubratovo Wastewater Treatment Plant, Sofia, Bulgaria”</b>	
Date of listing	<b>N/A</b>	
GS Standard version applicable	<b>1.2</b>	
Date of transition to GS4GG (if applicable)	<b>GS4GG Transition Annex 09/03/2020</b>	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	<b>N/A</b>	
Date of design certification/inclusion (if applicable)	<b>N/A</b>	
Location of project/PoA/VPA	Host country(ies): <b>Bulgaria</b>	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> <b>Small scale</b> <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://registry.goldstandard.org/projects/details/719">https://registry.goldstandard.org/projects/details/719</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> <b>Certified project</b>	
Title/subject of deviation	<b>Deviation of VALIDATION AND VERIFICATION BY SAME VVB (RU 2020 PR – PR V1.2)</b>	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	<b>Point 2.2</b>
Specify the monitoring period for which the request is valid (if applicable)	Start date <b>01/09/2020</b> End date <b>31/03/2021</b>
Submitted by	Contact person name: <b>Konstantin RACHEV</b>
	Email ID: <a href="mailto:konstantin.rachev@rina.org">konstantin.rachev@rina.org</a>
	Organisation: <b>RINA</b>
	Project participant: Yes <input type="checkbox"/> <b>No</b> <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).	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/>  If yes: VVB name: <b>RINA</b> VVB Staff name(s): <b>Konstantin RACHEV</b>
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> <b>No</b> <input checked="" type="checkbox"/>

## 3| Deviation detail

### 3.1 | Description of the deviation:

RINA's request is for 4<sup>th</sup> verification phase (last one) of the 1<sup>st</sup> crediting period only.  
RINA's request is for a stand-alone extraordinary deviation (i.e. project-specific) from the VVB-requirements for the 4<sup>th</sup> monitoring period only, because the verifier is the same as validator – Konstantin RACHEV.

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

The conducted validations and verifications are as follows:

- The validation of the 1<sup>st</sup> crediting period was conducted by Mr. RACHEV as team leader and validator (as well as a technical and local expert) and Stefan MANEV (technical and financial expert), in addition one technical reviewer – Rekha MENON and approver Laura SEVERINO. **The project is successfully closed by GS.**
  1. First verification phase was conducted by Konstantin RACHEV as TL and validator (as well as a technical and local expert), in addition one technical reviewer – Rekha MENON and approver Laura SEVERINO. **The project is successfully closed by GS.**
  2. Second verification phase was conducted by Konstantin RACHEV as TL and validator (as well as a technical and local expert), in addition one technical reviewer – Cyril AUGUSTUS and approver Laura SEVERINO. **The project is successfully closed by GS.**
  3. Third verification phase was conducted by Konstantin RACHEV as TL and validator (as well as a technical and local expert), in addition one technical reviewer – Cyril AUGUSTUS and approver Laura SEVERINO. **The project is successfully closed by GS.**
  4. Forth verification phase was conducted by Konstantin RACHEV as TL and validator (as well as a technical and local expert), in addition one technical reviewer – Tugce KIRATLY and approver Giovanni D`ANGELO. **The project is under GS feedback round by GS.**
- The validation of the 2<sup>nd</sup> crediting period was conducted by Tugce KIRATLI (as Team Leader and validator), in addition one technical reviewer – Fulya OZEN and approver Laura SEVERINO. **The project is successfully closed by GS.**

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.*

The validation and re-validation phases as well as previous three verification Reports were successfully closed by the GS.

Moreover there are different technical reviewers in validation and 4<sup>th</sup> verification phase.

### 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):

RINA's involuntary inconsistency did not come from ignorance of GS4GG's requirements but out of confusion caused by the unexpected urgency of the events (i.e. PP's urgency) that occurred.

#### 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.*

This request is therefore done not to create further delay to the Client.

### 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):

After an assessment by RINA, a low impact on the project can be determined. The only impact can be assessed on the impartiality of the verifier but due to the small period of verification the impact is estimated to be minimal.

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

Based on the analysis above, no impact occurs.

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

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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. Final Validation Report, covering the 1st crediting period – ver. 1.3 of 27/05/2016
2. Final Verification Report, covering the 1st verification monitoring period – ver. 1.4 of 04/01/2017
3. Final Verification Report, covering the 2nd verification monitoring period – ver. 1.3 of 01/07/2020
4. Final Verification Report, covering the 3th verification monitoring period – ver. 2.0 of 02/04/2021
5. Final Verification Report, covering the 4th verification monitoring period – ver. 4.0 of 20/03/2023
6. Final Validation Report, covering the 2nd crediting period – ver. 1.1 of 23/03/2021

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