

**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 – 08/05/2023**

#### **1.2 | Decision**

The deviation request is partially approved considering project developer took real and continuous action to transition the project and claim emission reductions. Project developer may claim GSCERs from 19/08/2018 to 31/12/2020, i.e., 3 years retroactive from the first physical site visit, and conclude the crediting period renewal for CP2 without any credit loss.

The project developer shall:

- a. Ensure 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 Deviations Approval Requirements and Procedures and overarching GS principles (as applicable).

- b. 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.

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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**

**2| Background information**

Deviation Reference Number	DEV_403	
Date of decision	08/05/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	26/04/2023	
Project/PoA/VPA	Project	ID – GS7676
	<input type="checkbox"/> PoA	NA
	<input type="checkbox"/> VPA	NA
Project/PoA/VPA title	Greenhouse Gas Emission Reductions Through Wind Energy Technology - Reliance Clean Power Pvt. Ltd.	
Date of listing	08/05/2020	
GS Standard version applicable	Principles & 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)	14/09/2022 (GSCER to GSVER)	
Date of design certification/inclusion (if applicable)	23/05/2022	
Location of project/PoA/VPA	India	
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/1943">https://platform.sustain-cert.com/public-project/1943</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Deviation from Site Visit and Remote Audit Requirements and Procedures, GHG Emissions Reduction & Sequestration Product Requirements And Principles & Requirements	
Specify applicable rule/requirements/methodology,	Section 3 of Site Visit and Remote Audit Requirements and Procedures version 1.0;	

with exact paragraph reference and version number	<p>Section 6.5 under Annex-B of GHG Emissions Reduction &amp; Sequestration Product Requirements Version 2.0;</p> <p>Section 5(e) of PRINCIPLES &amp; REQUIREMENTS version 1.2</p>
Specify the monitoring period for which the request is valid (if applicable)	Start date: 22/01/2018 End date: 31/12/2020
Submitted by	<p>Contact person name: Mr. Sumeet Singhvi</p> <p>Email ID: <a href="mailto:sumeet@infisolutions.org">sumeet@infisolutions.org</a></p> <p>Organisation: Infinite Environmental Solutions LLP</p> <p>Project participant: Yes <input type="checkbox"/> No <input checked="" 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)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

### 3 | Deviation detail

#### 3.1 | Description of the deviation:

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

The project activity is registered under CDM with CDM ID: 9225 and has been design certified under Gold Standard as GSCDM on 23/05/2022. Under CDM the project activity has 10 years of fixed crediting period i.e. from 30/03/2014 to 29/03/2024 and has claimed CERs from 30/03/2014 to 20/01/2018. Project activity has completed Transition from GSCER to GSVER on 14/09/2022. Currently the project is undergoing Performance Review no. 01 to claim GSCERs for monitoring period from 22/01/2018 to 31/12/2020 and Performance review no. 02 to claim GSVERs from 01/01/2021 to 31/03/2022.

According to section 3 of Site Visit and Remote Audit Requirements and Procedures version 1.0 dated 17/11/2021:

*"3.1.1 | At minimum, the VVB shall conduct physical site visit*

*a. Within two years of project start date; and*

*b. Once every three years after the first physical site visit"*

And

*"3.2.2 | A physical site visit by VVB is mandatory at the first verification of a project"*

And

According to the section 6.5 under Annex-B of GHG Emissions Reduction & Sequestration Product Requirements version 2.1

*"6.5.1 | 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.*

*6.5.2 | The first crediting period renewal under GS4GG considers the crediting years that have already been issued with other standards. For example, if a project crediting period start date with standard X is 1st Jan 2019, the project shall renew its crediting period with GS4GG on or before 1st Jan 2024, irrespective of date of transition approval with GS4GG."*

And

Section 5(e) of Principles & Requirements version 1.2

*"5.1.45 | To maintain Gold Standard Certified Project status beyond five years, a Project must undergo Design Certification Renewal. This process shall begin (defined by the submission of a Renewal opinion by a VVB for Design Review to Gold Standard) no later than the last date of current certification cycle. Note that review of the Design Certification Renewal may complete after the last date of current crediting period. In this case, the renewal date shall be the first day after the end date of the current certification cycle.*

*5.1.46 | Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay)."*

Please note that PP has completed the verification for monitoring periods from 22/01/2018 to 31/12/2020 and from 01/01/2021 to 31/03/2022. Also, performance reviews are undergoing for both the monitoring periods. A remote site visit was conducted for Design Certification on 18/08/2021, physical site visit for first verification was conducted on 08/08/2022 and for 2<sup>nd</sup> MP the physical site visit was conducted on 30/01/2023.

In light of the challenges described under section 3.2.1 below, we request a deviation to continue the process of performance review and renewal of crediting period.

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

Not Applicable

### 3.2 | Assessment of the deviation:

3.2.1 | Deviation assessment (to be completed by Project developer):

We request you to kindly consider the following points regarding deviation request:

- PP choose to claim GSCERs from 22/01/2018 to 31/12/2020 as per *10.2.3 of GHG Emissions Reduction & Sequestration Product Requirements* and for that site visit was required at 21/01/2020. The project was Design Certified on 23/05/2022 and a remote site visit was conducted for Design Certification on 18/08/2021.
- According to *Site Visit and Remote Audit Requirements version 1.0*: Physical site visits are required within 2 years of the project start date and thereafter every 3 years.  
The project activity is transitioned from CDM, and thus its project start date is 28/06/2011 (as per registered GS PDD, Section C.1.1, p34). So, we would have not been able to meet "2 years for a physical site visit" requirement in the scopes of GS in any case. Until we had got our project design certified under GS (23/05/2022), we would not have been able to make a decision to proceed further for verification of the project, and respectively to proceed to the first site visit in the scopes of verification.
- The rule update *Applicability of Minimum Site Visit Requirements by VVB and Site Visit and Remote Audit Requirements version 1.0* came in to force respectively from

16/08/2021 and 17/11/2021. Therefore, PP was not aware about conducting site visit on the required date i.e. 21/01/2020.

Also, as per COVID 19: INTERIM MEASURES GS4GG guidelines, Interim measures have been extended from 30/06/2022 to 31/12/2022 for only those projects which are located at a place where COVID-19 related restrictions still exist; In the project location, physical site visit for year 2021 and 2022 was not possible due to COVID – 19 restrictions on travel.

- Further as per section '2.2.2 -ii-a' of *Applicability of minimum site visit requirements by VVB "First site visit: In case the VVB site visit is not conducted within first two years after the start of crediting period"*,

*ii. If the start date of the crediting period is before the project registration date and the delays were due to;*

*Force majeure, the project crediting period start date may be postponed for a maximum up to two years. In such a case, the VVB shall validate that no changes have occurred to the baseline, otherwise a conservative approach needs to be followed."*

However, in case of GSCER it is not possible to postpone project crediting period start date for a maximum up to two years because it is not possible to issue GSCERs beyond 2020, hence kindly allow us to claim the GSCERs from 22/01/2018 to 31/12/2020.

- The project has a fixed crediting period under CDM i.e. from 30/03/2014 - 29/03/2024. As per section 6.5 under Annex-B of GHG Emissions Reduction & Sequestration Product Requirements version 2.1 under GS4GG renewal of crediting period is required before 29/03/2019 (end date of CP1 as per GS4GG cycle, 30/03/2014 to 29/03/2019). Since the project was Design Certified on 23/05/2022, RCP for CP2 (30/03/2019 to 29/03/2024) was not possible in the year 2019.

We request you to kindly allow the deviation from Section 5(e) of Principles & Requirements version 1.2 to conclude the crediting period renewal for CP2 without any credit loss.

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

Not Applicable

### 3.3 | Impact of the deviation:

#### 3.3.1 | Impact assessment (to be completed by Project developer):

The deviation of this project lies in the scope of DEVIATION APPROVAL REQUIREMENTS AND PROCEDURES version 1.2. During the delay period, the project owner has continued to monitor all parameters which were validated and approved during the Design Certification. The above deviation will not cause any impact upon the data quality or attract any potential risk on GS related to any issuance or any other material impact affecting the quality of the project. Thus, no potential risk is attributed to GS Project activity in particular. The deviation requested adheres to the Principles and Requirements set forth by GS4GG and complies with:

**Environmental Integrity** - The GSVERs generated from the project activity are not overestimated because of deviation and conservativeness is ensured.

**Contribution to Sustainable Development Goals** - SDG contributions that the project is designed to achieve are in line with GS4GG requirements and the above deviation does not have any potential impact upon the certified SDGs claimed during the current monitoring period.

**Safeguarding Principles and requirements** - The deviation does not create any impact upon the safeguarding principles and requirements set forth by GS4GG.

**Compliance with Host Country Regulations** - The project does not create any conflict with Host Country regulations and all the host country regulations are followed.

Project Proponent has already started the process of Design Certification Renewal and will ensure to follow all the guidelines of GS4GG in future. Since the project proponent has not claimed credits so far in GS4GG and the project will not be able to sustain itself without carbon credits, issuance for the current monitoring period is needed to continue its operation.

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

Not Applicable



### 3.4 | Documents:

1. Design Review Final Feedback
2. Registered GS PDD
3. Transition Review Final Feedback

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