

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 18/05/2023

1.2 | Decision

The deviation request is approved.

The project developer may continue with the performance review to claim GSCER for the period 01/07/2018 to 28/12/2020 (including both days) considering a remote site visit (as per COVID requirements) was performed on 10/07/2020 (as mentioned in the GS Validation report [GS7555 - Solar PV power project by Roha Dyechem Pvt. Ltd. \(EKIESL.CDM.Aug-11-02\) \(sustain-cert.com\)](#)) and a physical site visit was performed on 12/05/2022 for the verification activities (as can be seen in the CDM Verification Report [CDM: Applus1640001812.09 \(unfccc.int\)](#)).

The project developer shall:

- a. Ensure continuity in the Project's monitoring activities is maintained and PD 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 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_419	
Date of decision	18/05/2023	
Precedent (YES/NO)	YES	
Precedent details	DEV_402	
Date of submission	15/05/2023	
Project/PoA/VPA	Project	ID – GS7555
	<input type="checkbox"/> PoA	NA
	<input type="checkbox"/> VPA	NA
Project/PoA/VPA title	SOLAR PV POWER PROJECT BY ROHA DYECHEM PVT. LTD. (EKIESL.CDM.AUG-11-02)	
Date of listing	NA	
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)	NA	
Date of design certification/inclusion (if applicable)	23/08/2021	
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	https://registry.goldstandard.org/projects/details/2057	
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	

<p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p>	<p>Section 3 of Site Visit and Remote Audit Requirements and Procedures version 1.0</p> <ol style="list-style-type: none"> 1. https://globalgoals.goldstandard.org/standards/112_V1.0_PAR_Site-Visit-and-Remote-Audit-Requirements.pdf 2. https://globalgoals.goldstandard.org/ru-2021-applicability-of-minimum-site-visit-requirements-by-vvb/ <p>(Clause 2.a, section 2.2.2- If the start date of the crediting period is before the project registration date and the delays were due to; a. Force majeure, the project crediting period start date may be postponed for a maximum upto 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)</p> <p>a. Force-Majeure: Any cause constituting force majeure i.e., an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable. Such events may include, but are not limited to; – any act of war (whether declared or not), invasion, revolution, insurrection, terrorism, or any other acts of a similar nature or force, that prevents VVB travel to project site – Natural disaster like flood, earthquake, etc. – Change in Governmental requirements, policy, etc that affect the project implementation and operation – Any other situation which meets the definition above Force majeure does not include shortage of personnel, industrial action, economic downfall, sickness of personnel, breach of contract by subcontractors and liquidity or solvency problems.</p>
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Specify the monitoring period for which the request is valid (if applicable)	Start date: 01/07/2018 End date: 28/12/2020
Submitted by	Contact person name: Sumeet Singhvi
	Email ID: sumeet@infisolutions.org Organization: Infinite Environmental Solutions LLP
	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 type="checkbox"/> No <input checked="" type="checkbox"/> If yes; VVB name: VVB Staff name(s):
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: 7442 ¹and has been design certified under Gold Standard as GS CDM on 23/08/2021. Under CDM project activity total length of crediting period is 21 years (7 years + 7 years + 7 years) starting from 29/12/2013. Project activity has claimed CERs under CDM from 29/12/2013 to 30/06/2018. The project design certification date as GSCER is 23/08/2021. The start date of the project activity as per GS CER is mirrored from 01/07/2018 as per the approved GS PDD and it is before the design certification date under GSCER activity.

¹ https://cdm.unfccc.int/Projects/DB/KBS_Cert1348557135.31/view?cp=1

Currently, the project is undergoing Performance Review no. 01 to claim GSCERs for the monitoring period from 1/07/2018 to 28/12/2020 as per the registered Project activity under GSCDM mechanism

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 VVB3 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"

The PP is claiming the GS CER for the current monitoring period from 1/07/2018 to 28/12/2020 for which the CER credits are issued and the Performance Review is undergoing for the same under GS CDM. The project got design certified on 21/08/2021 and as remote site visit was conducted for Design Certification on 10/07/2020 and as per the applicability of rule of minimum site visit requirement physical site visit for verification was conducted on 10/02/2022, that falls within 2 years from the design certification date. But the mirrored project crediting period start date as per GS CER requirement starts from 01/07/2018 as approved from the GS board. In line of the challenges described above, a deviation to continue the process of performance review is sought for project activities to claim CERs from the mirrored date due to unviability of GS rules on PARA minimum site visit requirement during the project transfer and registration time.

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 from Site Visit and Remote Audit Requirements:

- PP choose to claim GSCERs from 01/07/2018 to 28/12/2020 as per *10.2.3 of GHG Emissions Reduction & Sequestration Product Requirements* and for that site visit was required on 30/06/2020. The project was Design Certified on 23/08/2021 and a remote site visit was conducted for Design Certification on 10/07/2020.

- 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 **28/02/2011** (as per registered GS PDD, Section C.1.1, p40). 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 the project design certified under GS (23/08/2021), the project proponent was uncertain to make a decision to proceed further for verification of the project, and respectively plan 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 into force respectively from 16/08/2021 and 17/11/2021. Therefore, PP did not have knowledge of the scheduled date for conducting the site visit.

Also, the other guideline, i.e. 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, a physical site visit for year 2021 was not possible due to COVID – 19 restrictions and due to forced majeure and economic uncertainty the world faced, during the pandemic time.

- 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 the case, since there is lack of clarity on minimum site visit rule during the transition time, followed by COVID period that world faced and India faced from 30-1-2020, the site visit cannot happen and since there is no change in baseline and major effect in the project implementation, it is utmost important to claim credits from the date of crediting period from GS PDD from 01/07/2018 to 28/12/2020 (GS CER period)

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 form
2. Registered GS PDD

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption