

### **TEMPLATE**

### **DEVIATION REQUEST FORM**

PUBLICATION DATE 11.04.2021

Version 5.0

### A. To be completed by Gold Standard

### 1 Decision

### 1.1 | Date - dd/mm/yyyy

06/06/2023

### 1.2 | Decision

The deviation request is APPROVED for those VPAs where the submission of a Renewal opinion by a VVB for Design Review to Gold Standard were affected by the problem in SustainCERT platform and the delays caused by SustainCERT.

Those VPAs for which the end of Crediting Period fall after a solution was provided, shall comply with section 5 (e) from the PRINCIPLES & REQUIREMENTS Version 1.2.

For those VPAs that this decision is applicable, the PD may claim the second crediting period of the project starting immediately after finalization of CP1 considering that all the requirements of the Principles and Requirements are complied with. The decision is subject to fulfilment of the following condition:

The PD shall ensure that a 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 (version 1.2) and overarching GS principles (as applicable).

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

The validating VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provides its opinion in the Validation 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)

This deviation request is for the submission of the revalidation documents (for VPAs transitioning from TPDDTEC v3.1 to SDWS v1.0) missing the end of the first crediting period due to delays and poor communication from SC.

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GS1247 VPA 91 Improved Kitchen Regimes Multi-Country PoA - Dowa Boreholes, Malawi, GS5329 GS1247 VPA 96 Improved Kitchen Regimes Multi-Country PoA - Dowa Boreholes, Malawi, GS5336 GS1247 VPA 98 Improved Kitchen Regimes Multi-Country PoA - Dowa Boreholes, Malawi, GS5338 GS1247 VPA 100 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5340 GS1247 VPA 101 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5341 GS1247 VPA 102 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5342 GS1247 VPA 103 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5343 GS1247 VPA 104 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5344 GS1247 VPA 112 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5437 GS1247 VPA 113 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5438 GS1247 VPA 114 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5439 GS1247 VPA 115 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5440 GS1247 VPA 116 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5440 GS1247 VPA 116 Improved Kitchen Regimes Multi-Country PoA - Kasungu Boreholes, Malawi, GS5441
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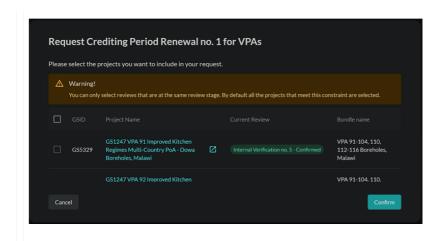
The emails below are evidence for the problems with booking on the SC platform and slow responses.

From: Oscar Lozada <oscar.lozada@co2balance.com>
Sent: 05 August 2022 21:08
To: Deepak Kumar <deepak.kumar@sustain-cert.com>
Cc: George Syder <george.syder@co2balance.com>; Gold Standard <help@goldstandard.org>
Subject: Error message on SC

Hi Deepak,

We're encountering this warning message when trying to book revalidation for VPAs GS5329-32, GS 5335-44, GS 5437-41.

As a result we are unable to select any of the other VPAs in the bundle for the review.



As far as we know, all VPAs in the bundle are in the same review stage, so we're not sure what the error is referring to. As such, we believe this is an error on SC's side.

Could you look into this and correct it on your side please?

Thanks very much,

#### Oscar Lozada

Senior Project Manager

**Tel**: +44 (0)1823 332233 **Skype**: live:oscar.lozada\_5

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From: Deepak Kumar < deepak.kumar@sustain-cert.com >

Sent: 08 August 2022 10:32

To: Oscar Lozada < oscar.lozada@co2balance.com >; help < help@sustain-cert.com >

Cc: George Syder <george.syder@co2balance.com>; Gold Standard <help@goldstandard.org>

Subject: RE: Error message on SC

Dear Oscar,

Our support team will look into this and get back to you.

Thanks...



Deepak Kumar

Senior Manager – IT Operations

From: Help <a href="help@sustain-cert.com">help@sustain-cert.com</a>
Sent: 09 August 2022 11:00

To: Oscar Lozada <a href="help@sustain-cert.com">oscar Lozada@co2balance.com</a>
Cc: help@sustain-cert.com; deepak kumar <a href="help@goldstandard.org">deepak.kumar@sustain-cert.com</a>; George Syder <a href="help@sustain-cert.com">george.syder@co2balance.com</a>; gold standard <a href="help@goldstandard.org">help@goldstandard.org</a>
Subject: Re:[## 7403 ##] RE: Error message on SC

Dear Oscar,

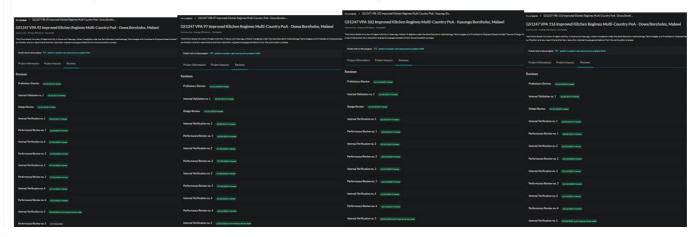
Kindly make sure all VPAs are in the same review status.

For Ex. if in 1st VPA Performance Review 1 is completed and in 2nd VPA Performance Review 5 is completed.

You wont be able to book Crediting Period Renewal without completing PR5 in 1st VPA.

---- On Tue, 9 Aug 2022 12:39:48 +0200 "Oscar Lozada" < oscar.lozada@co2balance.com > wrote ---Dear Helpdesk,

We have double-checked, and all VPAs in the bundle are in the same review. Please see these screenshots as examples:



As you can see they are all in Internal Verification no.5, with Performance Review 4 closed off. Therefore this appears to be a SC issue.

Alternatively we could book Crediting Period renewal for each VPA individually, though this would mean 19 separate bundles. Is this the best solution though?

Thanks,

Oscar Lozada Senior Project Manager

From: Help < help@sustain-cert.com > Sent: 18 August 2022 11:04 To: Oscar Lozada <<u>oscar.lozada@co2balance.com</u>>
Cc: <a href="help@sustain-cert.com">help@sustain-cert.com</a>; George Syder <<u>george.syder@co2balance.com</u>>; gold standard <<u>help@goldstandard.org</u>> Subject: Re:[## 7403 ##] RE: Error message on SC Dear Oscar, Our technical team is currently investigating the issue. We will come back to you as soon as we have something for you. ---- On Wed, 31 Aug 2022 11:08:52 +0200 "Oscar Lozada" < oscar.lozada@co2balance.com > wrote ----Dear Helpdesk, Thanks for looking into this, are there any updates on this issue? Thanks, Oscar Lozada Senior Project Manager Tel: +44 (0)1823 332233 Skype: live:oscar.lozada\_5 Follow us: Blog | LinkedIn | Instagram www.co2balance.com co2balance Dear Oscar, Thank you for your patience while our team is working to resolve this issue. I will let you know as soon as we have any updates.

Gold Standard

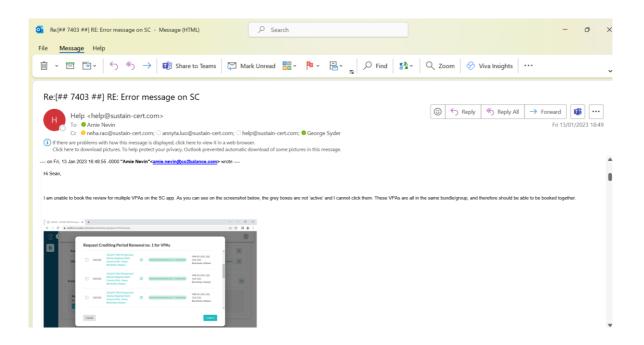
On Tue, 27 Sep 2022 16:30:26 +0100 "George Syder" <george.syder@co2balance.com> wrote</george.syder@co2balance.com>
Dear Helpdesk,
Could you please please provide further update on this issue?,
Kind Regards,
George
George Syder
Carbon Project Manager
www.co2balance.com
From: Help < help@sustain-cert.com > Sent: 28 September 2022 15:49 To: George Syder < george.syder@co2balance.com > Cc: help@sustain-cert.com; Amie Nevin < amie.nevin@co2balance.com > Subject: Re:[## 7403 ##] RE: Error message on SC
Dear Oscar,
I am stepping in to help resolve this issue for you as quickly as I can.
Can you please confirm that the review you are trying to book is crediting period renewal?
If this is the case, I will get the IT support team to edit the bundles for your convenience.
Looking forward to your reply.

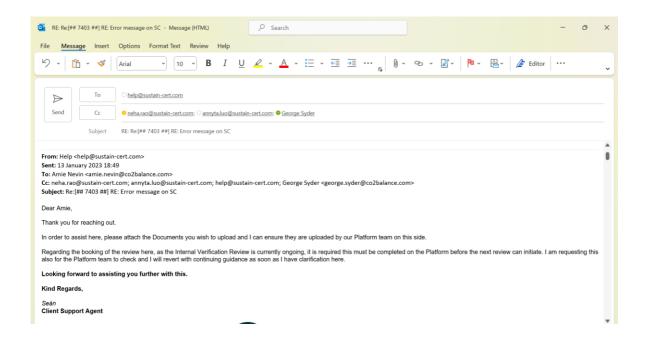
From: George Syder Sent: 30 September 2022 10:49 To: help@sustain-cert.com Cc: Amie Nevin <a href="mailto:nevin@co2balance.com">amie.nevin@co2balance.com</a> Subject: RE: Re:[## 7403 ##] RE: Error message on SC
Dear Helpdesk,
I can confirm the review is Crediting Period Renewal,
Kind Regards,
George
George Syder
Carbon Project Manager
www.co2balance.com
On Wed, 2 Nov 2022 10:09:19 +0000 "George Syder" <george.syder@co2balance.com> wrote</george.syder@co2balance.com>
Dear Helpdesk,
Could you please provide further update on this issue?
Kind Regards,
George
George Syder
Carbon Project Manager
www.co2balance.com

From: Help < help@sustain.cert.com> Sent: 03 November 2022 15:54 TO: George Syder@eorge.syder.sy
Dear George,
Apologies for the overdue response here.
I have consulted with our team and it has been confirmed that, as the last finished review here is "Performance Review no. 4" & the next confirmed booking is for "Internal Verification no. 5". It is required that the preceding reviews must be finished before the next may be booked. In this case then other reviews not yet completed in front of "Crediting Period Renewal 1".
Looking forward to assisting further here, if required.
On Fri, 2 Dec 2022 15:51:33 +0000 "Amie Nevin" <a href="mailto:amie.nevin@co2balance.com">wrote</a>
Good afternoon,
I am now the lead contact for this project. I am disappointed to see we first contacted you with this problem in August and it is still not resolved. The first crediting period for this project ends 12/31/2922. Booking was attempted in August.
Firsty. I kindly share we currently have another project we have registered with you undergoing revalidation and verification review at the same time. As such this statement is not true - It is required that the preceding reviews must be finished before the next may be booked. I expect consistency in the service you provide.
Secondly, in response to in this case there are 4 other reviews not yet completed in front of "Crediting Period Renewal 1". Because of monumental delays we have endured from SC, we are significantly behind on our review schedule and as a result we are going through verification reviews now that should have been completed long ago. We therefore need to do reviews simultaneously to try our best adhere to the requirements for the crediting period renewals given your slow service.
We are currently stuck in Internal Verification No.5 – due to delays with your team verifying the process for the remote audit. Again – we should not be penalised for your delay.
I expect a swift response to this given the situation and timeline we're facing and a response to solving this issue and getting the revalidation review booked ASAP.
Thanks, Anie
From: Help <help@sustain-cert.com></help@sustain-cert.com>
Sent: 05 December 2022 16:49  To: Amie Nevin <a href="mailto:amie.nevin@co2balance.com">amie.nevin@co2balance.com</a>
Cc: help@sustain-cert.com; annyta luo <annyta.luo@sustain-cert.com>; neha rao <neha.rao@sustain-cert.com>; George Syder <george.syder@co2balance.com> Subject: Re:[## 7403 ##] RE: Error message on SC</george.syder@co2balance.com></neha.rao@sustain-cert.com></annyta.luo@sustain-cert.com>
Dear Amie,
Apologies for the delays and overdue timing in having this review confirmed for this project.  This review is being handled as a matter of priority.
I note that currently all required documents for Crediting Period Renewal no. 1 for GS5329 are awaiting upload. As soon as all review requirements are available, I will ensure this review is initiated as soon as is possible.
Hi Sean,
We will upload the documents, they are currently not uploaded as this is the first confirmation we have had that we are able to upload the documents onto the correct review stage.
Kind Regards,
George
George Syder Carbon Project Manager www.co2balance.com

The review was never going to be completed by the end of the crediting due this.

Trying to upload following this:





The problem with the platform is because of the overall delayed service SC are providing on reviews, leading to a backlog, backed up problems and overdue reviews not being able to begin at the appropriate time.

### 2 | Background information

N/A

	DEV. 440	
Deviation Reference Number	DEV_440	
Date of decision	06/06/2023	
Precedent (YES/NO)	Yes	
Precedent details	-	ign certification renewal
Date of submission	11/01/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	□ PoA	ID - GSXXXX
	⊠ VPA	ID - GS5331-2, GS5335-44
Project/PoA/VPA title  Project/PoA/VPA title	PoA - Dowa Bord GS1247 VPA 94 PoA - Dowa Bord GS1247 VPA 95 PoA - Dowa Bord GS1247 VPA 96 PoA - Dowa Bord GS1247 VPA 97 PoA - Dowa Bord GS1247 VPA 98 PoA - Dowa Bord GS1247 VPA 99 PoA - Kasungu B GS1247 VPA 100 PoA - Kasungu B	Improved Kitchen Regimes Multi-Country eholes, Malawi, GS5335 Improved Kitchen Regimes Multi-Country eholes, Malawi, GS5335 Improved Kitchen Regimes Multi-Country eholes, Malawi, GS5335 Improved Kitchen Regimes Multi-Country eholes, Malawi, GS5336 Improved Kitchen Regimes Multi-Country eholes, Malawi, GS5337 Improved Kitchen Regimes Multi-Country eholes, Malawi, GS5338 Improved Kitchen Regimes Multi-Country eholes, Malawi, GS5338 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5339 0 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5340 1 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5341 2 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5342 3 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5342 4 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5342 4 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5342 4 Improved Kitchen Regimes Multi-Country Boreholes, Malawi, GS5342
Date of listing	-	
GS Standard version applicable		
Date of transition to GS4GG (if applicable)	-	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	-	

Date of design certification/inclusion (if applicable)	-
Location of project/PoA/VPA	Republic of Malawi
Scale of the project/PoA/VPA	<ul><li>☑ Microscale</li><li>☐ Small scale</li><li>☐ Large scale</li></ul>
Gold Standard Impact Registry link of the project/PoA/VPA	
Status of the project/PoA/VPA	<ul><li>□ New</li><li>□ Listed</li><li>⋈ Certified design</li><li>□ Certified project</li></ul>
Title/subject of deviation	Crediting period renewal – delayed uploading of revalidation documents due to SC error.
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Revalidation of a safe water project from TPDDTEC v3.1 to SDWS v1.0
Specify the monitoring period for which the request is valid (if applicable)	Start date End date N/A
Submitted by	Contact person name: Amie Nevin
	Email ID: amie.nevin@co2balance.com
	Organisation: CO2balance UK Ltd
Validation and Verification body	Project participant: Yes $\boxtimes$ No $\square$ Yes $\square$ No $\boxtimes$
(VVB opinion shall be included,	TES LINO A
where required by the applicable rules/requirements or request is submitted by the	If yes; VVB name:
VVB).	VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes □ No ⊠ Not for these VPAs

### 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 <a href="Deviation Approval Procedure/Design Change Requirements">Design Change Requirements</a>.

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

The revalidation review for CP2 will commence after the end of CP1 due to SC platform error and poor communication.

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.

. . . . . .

### 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):

This only has an administrative impact on the project, we are in preparations for the changes needed to practically adopt SDWS v1.0 in the field.

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### 4.1.1 | 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.

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### 4.2 | 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.

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

This only has an administrative impact on the project, we are in preparations for the changes needed to practically adopt SDWS v1.0 in the field.

### 4.2.2 | 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.

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### 4.3 | 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	
		Additional information added:	
5	11.04.2022	- date of listing, design certification, transition	
		- standard version	

	1	<u></u>
		- 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