

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 09/06/2023

1.2 | Decision

The deviation request is approved to claim VERs for period 12/10/2022 to 01/12/2022.

To ensure that emission reductions are not overestimated for this period, the Project Developer shall:

- a. Recalculate the GHG emission reduction for this period and adjust any emission reduction overestimation due to changes in GEF (if any) from the start of crediting period 2 I.e 12/10/2022 at the time of the next issuance, based on the estimated values for the grid emission factor.
- 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 evaluate the Project's compliance with the above-mentioned conditions and provide 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_449	
Date of decision	09/06/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	19/04/2023	
Project/PoA/VPA	Project	ID – GS10887
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	AVN08-S-01, Methane Recovery and Biogas Utilization Project, Nghe An Province, Vietnam	
Date of listing	03/03/2021	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	03/11/2022	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	03/11/2022	
Date of design certification/inclusion (if applicable)	30/08/2021	
Location of project/PoA/VPA	Host country(ies)	
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	https://registry.goldstandard.org/projects/details/2876	
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	Reduction of issuance due to renewal delay	
Specify applicable rule/requirements/methodology	Ref. GS principles and requirements par. 5.1.45 / 5.1.46	

gy, with exact paragraph reference and version number	
Specify the monitoring period for which the request is valid (if applicable)	Start date End date
Submitted by	Contact person name: Tom Hayes
	Email ID: tom.hayes@agasco.com
	Organisation: Agasco 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 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 checked="" type="checkbox"/> No <input 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):

The deviation request relates to the following comment raised during the renewal of crediting period SC review:

Ref. GS principles and requirements par. 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". and 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).

Last day of project crediting period CP1 before renewal was 31/08/2022, and the 2nd crediting period start date of the project under GS4GG is 01/09/2022 according to FVR, Section D.4. The first VVB report version submitted (GS.VAL.22.51_VCR_10887.pdf) is dated 01/12/2022, which is after 31/08/2022. Thus, the project can make claims for VERs under 2CP only starting from 01/12/2022.

It is important to view this request in the context of the CDM – GS4GG transition timeline:

CDM Crediting Period	01/09/2017 – 31/08/2024
GS CER Listing Date	03/03/2021
Design Certification Closure	16/05/2022
Transition Review Closure	03/11/2022
GS4GG CP Adoption Date	03/11/2022
CP Renewal Date (VVB Report Date)	01/12/2022
GS4GG CP1	01/09/2017 – 31/08/2022
GS4GG CP2	01/09/2022 – 31/08/2025

Only at the approval date of the CER – GS VER transition (03/11/2022) did the project formally adopt the revised 5-year GS4GG crediting period. Therefore, it was impossible to submit the GS4GG CP renewal request before 31/08/2022 as the transition review had not concluded.

Without confirmation of the GS transition, we could not finalise the CP renewal validation with the VVB. The VVB can only sign off a GS4GG renewal report if the project has completed GS4GG transition. Despite the significant financial risk, we contracted a VVB (10/10/2022) for the renewal once we had reasonable assurance

that the transition would be successful. Following the transition review closure, the validation was completed soon as possible (subject to VVB internal workload).

From the submission of documents in January 2021 to start the GS Transition process, the project has faced immense uncertainty over its future due to GS transition procedure changes, conflicting review comments at almost every review and multiple delays to SC timelines. We doubt we would be in this position if we had not faced these issues. To penalise the project at this stage, when revenues are vitally needed to ensure the continuation of the project, goes against the principle of providing GS projects with solutions to their ongoing financial need.

It should also be considered that the project activity operates on a seasonal basis following the cassava harvest, which is usually between August and April. The project only produces ERs within these months. If ERs are unclaimable between 01/09/2022 and 01/12/2022, it is exceptionally damaging to project revenues compared to projects that continuously reduce emissions. If 5.1.46 is enforced, the financing structure of the project may need to be reassessed and could place the project at risk of discontinuation.

We, therefore, request the reduction of any issuance in this period according to 5.1.46 be waived since it was impossible to renew the crediting period before its expiry. We acknowledge that it will rarely be the case that the GS4GG approval date occurs after the 1st CP end date and that GS would not likely have considered the issue at the time of writing the principles and requirements.

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.*

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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):

The deviation complies with all requirements beyond para 5.1.46 and does not require specific remedies to ensure accuracy, completeness or conservativeness.

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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.*

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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):

There is no negative impact of the deviation request to the project:

Project Design	The project design will not be impacted by the deviation since it is a procedural deviation, rather than project specific.
Safeguarding Principles Assessment	The safeguarding principles assessment will not be impacted by the deviation since it is a procedural deviation, rather than project specific.

SDG Assessment	The SDG will not be impacted by the deviation since it is a procedural deviation, rather than project specific.
Emission Reductions	The ERs during this period will be restored if the deviation is approved. This will only benefit the project and ensure it's ongoing financial need is met. If 5.1.46 is enforced in this case, the financing of the project may need to be reassessed and could place the project at risk of discontinuation.
Monitoring Frequency	The monitoring frequency will not be impacted by the deviation since it is a procedural deviation, rather than project specific.
Data Quality	The Data Quality will not be impacted by the deviation since it is a procedural deviation, rather than project specific.

3.3.2 | 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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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.)*

Version number	Release date	Description
5	11.04.2022	Additional information added: - date of listing, design certification, transition

		<ul style="list-style-type: none"> - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption