

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 29/08/2023

1.2 | Decision

The deviation request is approved considering there was only 14 days (about 2 weeks) delay in the payment of the invoice for preliminary review.

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).

The verifying VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above condition and provide its opinion in the Verification Report.

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

Deviation Reference Number	DEV_461	
Date of decision	29/08/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	20/06/2023	
Project/PoA/VPA	Project	ID – GS12137
	<input type="checkbox"/> PoA	ID – N/A
	<input type="checkbox"/> VPA	ID – N/A
Project/PoA/VPA title	15 MW solar plants to power COP27	
Date of listing	Not listed. Documents for preliminary review uploaded on 10/05/2023	
GS Standard version applicable	GS4GG Principles & Requirements, version 1.2	
Date of transition to GS4GG (if applicable)	Not Applicable	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not Applicable	
Date of design certification/inclusion (if applicable)	Not Applicable	
Location of project/PoA/VPA	Egypt	
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	The Project is not in the Impact Registry yet	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Date of Project submission for Preliminary Review	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	GS4GG Principles and Requirements, ver1.2: para. 4.1.49(b), para. 5.1.7(c) Rule Update “The SDG Impact Tool” ver 2.0. footnote 1 (para. 2.1.3, page 2)	
Specify the monitoring period for which the request is valid (if applicable)	Not Applicable Start date N/A End date: N/A	
Submitted by	Contact person name: Marina Fernandez	
	Email ID: focalpoint@firstclimate.com	
	Organisation: First Climate (Switzerland) AG	

	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: N/A VVB Staff name(s): N/A
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:

**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):

First Climate (Switzerland) (**FCS**) developed and, being fully aware about the importance of the prior consideration requirements, uploaded the whole package of documents (as required by para. 5.1.8 of GS4GG Principles and Requirements, ver1.2) for the Project GS 12137 "15 MW solar plants to power COP27" (the **Project**) for Preliminary Review on the 10/05/2023, within 1 year period after the Project Start Date (16/05/2022). FCS received invoice for Preliminary Review fee from GS on the 11/05/2023 and paid this invoice on the 30/05/2023. On the 14/06/2023 FCS received notification from GS that the *Project* is not eligible, as prior consideration requirement is not met (more than 1 year passed by since Project start date until the Project is submitted for Preliminary Review). FCS also received the answer to its Clarification Request, that Project is considered submitted for Preliminary Review when the fee for Preliminary Review is paid, as per footnote 1 of Rule Update "The SDG Impact Tool".

FCS, when developing the Project, first off all referred to core document *GS4GG Principles and Requirements, ver 1.2*

Requirement for prior consideration, as stated in para. 4.1.49 (b) of *GS4GG Principles and Requirements* does not explicitly determine the term "First Submission". Para. 5.1.7 (c) of *GS4GG Principles and Requirements* states that Preliminary Review Starts once respective fee is paid, but this para. does not determine whether "Start of Preliminary Review and time of "First Submission" are the same. From its previous experience FCS is aware that Preliminary Review start date can be only scheduled once the fee is paid (technically "Schedule Preliminary Review" button is only activated, once Invoice status is changed to "paid" while Invoice cannot be issued, unless the submission of the documents is fully completed). However, the payment of the fee requires completion of certain administrative actions (issuing invoice, processing and payment of the invoice), and timeframes for these activities cannot always be the same and are not always under full control of a project developer. That is why FCS interpreted the Date of First Submission (date when the documents were uploaded) and the Date of Start of Preliminary review (date when the Preliminary review starts, once the fee is paid) as two different dates. Moreover, the information under Frequently Asked Questions (FAQ) section for Preliminary Review Process ([Preliminary Review Submission Process \(zohodesk.com\)](https://zohodesk.com)) is not fully consistent with the process followed during submission of Project for Preliminary Review. Step 6 envisages that Preliminary Review is booked BEFORE the Invoice is issued. And invoice shall be issued not later than 30 days prior the "booked" Preliminary Review date or immediately. Apparently, in Preliminary Review process of the Project: Once the submission of the documents had been completed, FCS received the invoice with due date of 10/06/2023, but the booking of the Preliminary Review was possible only once the invoice had been paid (invoice was paid on 30/05/2023). This also makes FCS assume that the Date of documents submission to SustainCert portal (but not the Date when the invoice was paid) determines the date of when the Project is considered to be submitted for the Preliminary Review. In fact, if FCS had paid the invoice (issued on the 10/05/2023) until 16/05/2023, the Project would have been fully eligible as per definition in the footnote 1 of Rule Update "The SDG Impact Tool".

Taking into account that:

- Clear Definition of "when the Project is considered to be submitted to Preliminary Review" is not provided in the Core Document "GS4GG Principles and Requirements", ver1.2

- FAQ section about Preliminary Review Process, Step 6 ([Preliminary Review Submission Process \(zohodesk.com\)](#)) deviates from currently applied process.
- FCS has uploaded to SustainCert portal all documents required for Preliminary Review on 10/05/2023, before the deadline of 16/05/2023, being fully aware about the importance of this deadline.
- Issuance of Invoice is only possible once submission of the documents has been fully completed, and booking of the Preliminary Review Date is only possible once Invoice is paid.
- Invoice was issued on 11/05/2023 with the due date (and respectively the Date of start of Preliminary Review – is not later than 10/06/2023, if applying information provided in Step 6 of FAQ Section)
- FCS has paid invoice on 30/05/2023, before Invoice Due Date (10/06/2023)
- Timeframes required for issuance and payment of Preliminary Review invoice may vary and are not always under full control of the developer

We kindly request Gold Standard to accept the deviation from the definition of the “Project submitted to Preliminary Review” provided in the Footnote 1 of the Rule Update “SDG Impact Tool”, accept the Date of Documents submission (10/05/2022) as a date when “the Project is considered to be submitted for Preliminary Review”, reconsider GS decision reg. Project ineligibility due to late submission for Preliminary Review (decisions sent to FCS on 14/06/2023), and list the Project under 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.*

Not applicable

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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 request complies with the requirements, accuracy, completeness and conservativeness and follows *the GS4GG Principles and requirements, ver 1.2* and *GS4GG Deviation Approval Requirements and Procedures, ver.1.2*

As required by para. 2.1 of *GS4GG Deviation Approval Requirements and Procedures, version 1.2*, the following principles are adhered to:

- a. Environmental integrity: The deviation request does not affect the capacity of the Project, neither Project set-up, hence the amount of GS VERs will not be overestimated as a result of the deviation, ensuring conservativeness.
- b. Contribution to the Sustainable Development Goals (SDGs): As the capacity of the Project and its set-up remain the same, there are no changes and compromises with the project activity SDG contributions in line with GS4GG requirements.
- c. Safeguarding principles and requirements: The Project will remain in line with the *GS4GG Safeguarding principles and requirements*, as deviation request does not affect Project set-up and thus does not relate to safeguarding principles and requirements.
- d. Compliance with host country regulations: deviation request does not have any influence on compliance of the Project with host country (Egypt) regulations.

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.*

.....Not Applicable

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):

the Deviation does not have any impact on the project design, safeguarding principles assessment, emission reductions, SDG impacts or on the data quality.

The Project contribution to SDG 13 will remain the same: the Project will reduce 13,783 tCO₂ per year. The deviation will not affect the contribution of the Project to SDG7 by generating 34,492 MWh/year of clean electricity. And finally, the Project will create local employment opportunities during the construction and operation of the project activity, contributing towards SDG 8. The Deviation will not affect the contribution of the Project to SDG, as Project set-up is not affected by the Deviation.

3.3.2 | VVB opinion (to be completed by VVB, if applicable): Not 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.)*

1. Decision of GS on Project eligibility (e-mail dated 14/06/2023)
2. GS answer to clarification request of FCS (e-mail dated 19/06/2023)
3. GS invoice for Preliminary Review fee (e-mail and attachment, dated 11/05/2023)
4. GS FAQ Section: Preliminary Review Process Screenshot: with marked content of Step 6
5. Confirmation of FCS payment of the invoice for Preliminary Review.
6. Evidence that documents for Preliminary Review were uploaded on 10/05/2023: Screenshots

Version number	Release date	Description
5	11.04.2022	<p>Additional information added:</p> <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 <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption