

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 – 06/09/2023

#### 1.2 | Decision

The Deviation request is not approved.

The developer shall note that the project is eligible to claim credits for maximum three years window (08/11/2018-08/11/2021) and additional period of 15/11/2017 to 07/11/2018 is not in compliance with [GS-VVB requirements](#).

The Project Developer 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 condition 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)

**2 | Background information**

Deviation Reference Number	DEV_475	
Date of decision	06/09/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	02/06/2023	
Project/PoA/VPA	Project	ID – GS2429
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	WWF Ningshan County High Efficient Cook Stove Project	
Date of listing	-	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	04/01/2019	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	-	
Date of design certification/inclusion (if applicable)	28/05/2014	
Location of project/PoA/VPA	P. R. China	
Scale of the project/PoA/VPA	<input checked="" type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://registry.goldstandard.org/projects/details/344">https://registry.goldstandard.org/projects/details/344</a>	
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	On-site visits for verification
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Gold Standard COVID-19 interim measures: <a href="https://globalgoals.goldstandard.org/standards/RU-2022-TC-v6_COVID-19_Interim-measures.pdf">https://globalgoals.goldstandard.org/standards/RU-2022-TC-v6_COVID-19_Interim-measures.pdf</a> Applicability of minimum site visit requirements by vvb: <a href="https://globalgoals.goldstandard.org/ru-2021-applicability-of-minimum-site-visit-requirements-by-vvb/">https://globalgoals.goldstandard.org/ru-2021-applicability-of-minimum-site-visit-requirements-by-vvb/</a>
Specify the monitoring period for which the request is valid (if applicable)	Start date 12/11/2017 End date 31/08/2020
Submitted by	Contact person name: Xuan Yang Yuxi Feng Email ID: x.yang@southpole.com y.feng@southpole.com
	Organisation: South Pole Carbon Asset Management 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: China Classification Society Certification Company (CCSC) VVB Staff name(s): Xingtong LI Wusen Zhou Rui Zhang
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):

For WWF Ningshan County High Efficient Cook Stove Project, CCSC was contracted by South Pole Carbon Asset Management Ltd. in March 2021 to conduct the verification for the monitoring period (15/11/2017 to 31/08/2020). It is the 4<sup>th</sup> verification for the project. All previous three verification were concluded and credits were issued. The summary for the previous three verifications is provided below:

MP	Verification bodies	Monitoring periods	Conclusion dates
1	Gold Standard Internal Verification	29/07/2013-31/12/2014	/
2	Gold Standard Internal Verification	01/01/2015-31/05/2016	/
3	Gold Standard Internal Verification	01/06/2016-14/11/2017	01/01/2019

As shown in the table, the last verification was for the third monitoring period (01/06/2016 to 14/11/2017), which was concluded on 01/01/2019. Since it is a micro scale project, as per Microscale Project Requirements, either an external VVB or GS internal verification could be used and the GS internal verification was adopted. Also, as per the Requirements, "a target-random approach was applied to the project appraisal, making use of an Objective Observer at Verification stage". This project was not selected for an appraisal by an Objective Observer for last verification and so no site visit was required.

Project developer believed that the onsite visit date (Dec 8<sup>th</sup> 2021) for this verification was a legitimate date. Since site visit for the last verification was exempted by GS as per internal verification procedure, and the last verification was finished on 1/1/2019, project developer was assuming that, from the date onwards, an onsite visit was required before 31/12/2021 to meet the minimum onsite visit requirement (at least once three years). Actually, due to the lockdown and travel restriction caused by covid 19, VVB conducted the onsite visit as early as possible as they could (Dec 8<sup>th</sup> 2021).

Now, the project developer was required to seek a deviation request approval from the GS to be allowed to claim ERs from 15/11/2017 to 07/11/2018 during the GS performance review.

During the monitoring period, the monitoring activities and procedures were conducted successfully because the project developer could remotely direct the staffs who based in the Huangguanshan Nature Reserve to carried out the usage survey and efficiency tests. All the data was successfully transferred online, and PP received the original documents after the delivery service was back to normal. Data and documents were checked by project developer and verified by VVB. As mentioned above, this microscale project went well and no impacts was detected on monitoring systems and procedures, data quality, or project design.

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.*

According to Section 3.1.1 of the site visit and remote audit requirements and procedures v1.0, the VVB (for micro-scale project internal validation/verification, SustainCERT acts as a VVB) shall conduct physical site visit once every three years after the first physical site visit. For the 4<sup>th</sup> verification of project GS2429, the VVB paid a visit to the project site on 08/11/2021, which only covers a valid period from 08/11/2018 onwards. In this case, the PD seeks a deviation from the site visit and remote audit requirements and procedures v1.0, for it still wishes to claim ERs from 15/11/2017 to 07/11/2018, as required by SustainCERT.

As a micro-scale project, the project GS2429 has been verified by Gold Standard Internal Verification for the first three monitoring periods and was concluded on 01/01/2019 for the 3<sup>rd</sup> monitoring period. The PD planned to have a site visit from a VVB for the 4<sup>th</sup> one at the year 2020 and was not able to find one to do it because of the covid-19 pandemic.

The CCSC was finally contracted on 04/03/2021 but was only able to arrange an onsite trip on 08/11/2018 due to the travel control policies in the place of departure and arrival (any visitors shall stay in quarantine for at least 7 days prior to any local activity). As per the Section 4.1.1 of the COVID 19: INTERIM MEASURES, the VVB may postpone the on-site inspections, considering the rules of relevant national or local authorities, WHO recommendations, or polices of VVB. The VVB had tried to

arrange the onsite trip as early as possible and made sure the inspection includes the monitoring period from 15/11/2017 to 31/08/2020.

### 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 of onsite visit of this project followed the requirement of Transition Requirements, Gold Standard Rules and Requirements for general site visit regulations and the Covid-19 Interim Measure.

#### 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.*

The VVB may validate a deviation addressing a non-compliance with the minimum site visit requirement, when the reason for gaps in site visit is considered a Force-Majeure, where the situation of covid-19 pandemic is beyond the control of the PD and not involving the PD's fault or negligence and not foreseeable, according to the section 2 of applicability of minimum site visit requirement by VVB. In this case, the VVB is submitting a deviation request as required by SustainCERT to GS. Also, the VVB has conducted the onsite inspection as normal and required as the Covid 19: interim measures instructed.

### 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):

Following the proposed deviation, the impact will be evaluated as follows:

1. Project Design:

There is no change in the project design. The monitoring plan is implemented in compliance with the applied methodology and registered PDD. After the cluster of pandemics, the project developer ensured the monitoring plan was successfully conducted by providing the local staffs in Huangguanshan nature reserve with remote guidance.

2. Emission reduction:  
The value has been verified by approved VVB.
3. Monitoring frequency:  
Since there is no change in the project design, the monitoring frequency remains as per the registered PD. The monitoring activities have been verified by the approved VVB during the verification.
4. Data quality:  
No data quality is impacted. The data is in line with the monitoring requirements explained in registered PDD. Data quality can be ensured as the monitoring plan was clear and solid. VVB has checked and prove the accuracy & transparency of the data during the verification.
5. Safeguard principal assessment:  
The project has been transferred to GS4GG from GS version 2.2. The Safeguarding Principal and requirement had been verified during the transition. VVB has also evaluated the current implementation and confirmed there was no impacts on the safeguarding principles assessment.
6. SDG assessment:  
The SDG impact of the project will be assessed during the upcoming verification. The following SDGs impact would be demonstrated; SDG7, SDG8 & SDG13. The identification and justification under each SDG will be provided in the GS transition annex.
7. Potential risk or any other relevant aspect of the project:  
No impact in this component, and it had been evaluated during the verification by approved VVB.

### 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.*

The deviation only concerns the site visit and remote audit requirements and procedures v1.0, and does not involve any changes from the registered documents of this project, including project design, monitoring plan or the applied methodology.



This deviation follows the principles and definitions set out in the section 2 of the deviation approval requirements and procedures v1.1 as follows,

- a. Environmental integrity: despite the last verification conducted by GS Inner verification was completed on 01/01/2019, and the VVB has conducted an onsite inspection on 08/11/2021, the PD still seek a deviation request for the period from 15/11/2017 to 07/11/2018 so ER claim will not be overestimated and the rule of conservativeness will be ensured;
- b. Contribution to SDGs: all the SDG impacts claimed in the MR v03 were verified in line with GS4GG requirements in an independent manner;
- c. Safeguarding principles and requirements: all safeguarding reporting claims were verified in line with GS4GG requirements;
- d. Compliance with host country regulations: the PD has obeyed the relevant national and local regulations, including the travel control, and personnel involved in the onsite work were from local.

According to the requirements set out in section 4 of the deviation approval requirements and procedures v1.1, the VVB determines this deviation as follows,

- a. there is no temporary change from the registered monitoring plan as the registered monitoring plan was not impacted;
- b. there is no standard document or methodologies proposing a most conservative values approach for the non-conforming monitoring period, so the VVB is also seeking any precedent of TAC approval to find compliance with the principles of conservativeness.

### 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: <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> </ul>

		<ul style="list-style-type: none"> <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