

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 04/08/2023

1.2 | Decision

The deviation request is approved to use the site visits performed during the CDM verification process to be considered for the current process of transition to GS4GG and GS VER verification provided that:

- The claimed Monitoring Period for GS-VERs is the same as for the CDM monitoring period already verified by the VVB.
- There are additional checks (and remote audits when needed) done by the VVB to assess all Gold Standard for the Global Goals (GS4GG) rules and requirements, when applicable.
- The PD, for the next Monitoring Period, complies with the Site visit and remote audit requirements and procedures, in particular but not limited to the frequency of physical site visit requirement which shall consider the last site visit performed by a VVB.

- The Project Developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS PDD.
- The verifying VVB shall through appropriate means at its disposal, evaluate the PoA's compliance with the above conditions and provide its opinion in its Verification Report.
- SustainCert shall review both the PD's information 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_485	
Date of decision	04/08/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	13/07/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS11949
	<input checked="" type="checkbox"/> VPA	ID – GS11996 ID – GS11998 ID – GS11999
Project/PoA/VPA title	Small-scale solar electrical programme, South Africa	
Date of listing	25/04/2023	
GS Standard version applicable	Gold Standard for the Global Goals	
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)	NA	
Location of project/PoA/VPA	South Africa	
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://platform.sustain-cert.com/public-project/3196 https://platform.sustain-cert.com/certification/projects/3243 https://platform.sustain-cert.com/certification/projects/3245 https://platform.sustain-cert.com/certification/projects/3246	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input checked="" type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Site Visit requirement for the verification of GS VERs in terms of the VPAs for which site visits were done under the CDM verification.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Site Visit and Remote Audit Requirements and Procedures – V2.0, paragraph 3.2.2	

Specify the monitoring period for which the request is valid (if applicable)	Start date 16/12/2020 End date 31/08/2022
Submitted by	Contact person name: Ilya Goryashin
	Email ID: Ilya.goryashin@blueworldcarbon.com
	Organisation: Blue World Carbon Asset Management (Pty) 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 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):

In 2021 we started the process of CER verification generated by our CDM PoA 7484 “Small-scale solar electrical programme, South Africa” (GS11949) for CPA-002 (GS11996), CPA-003 (GS11998) and CPA-004 (GS11999), hoping to be able to issue and cancel the provisional CERs. After completing the first round of remote site visits during the CER verification as per the COVID guideline of UNFCCC, we were informed that the verifying DOE was selected by the UNFCCC for a performance assessment and the UNFCCC requested us and the DOE to redo the remote site visits because UNFCCC wanted to be part of this process. We proceeded and achieved another round of site visit during 3 site visit slots in June-July 2022. In Q3 2022 we decided to transit the PoA (GS11949) with the included VPAs to GS4GG to be able to

issue and cancel GS VERs. In December 2022 the preliminary review was initiated with GS4GG. PoA and all real case CPAs are undergoing combined inclusion & verification by VVB, followed by combined design and performance review by SustainCERT.

We are using TÜV SÜD South Asia Private Limited for the PoA and VPA transition to GS4GG as well as GS VER verification, which was previously appointed to do CER verification under the CDM in 2021.

We understand that as per the GS4GG requirements (Site Visit and Remote Audit Requirements and Procedures – V2.0, paragraph 3.3.1 and 3.2.2), a physical site visit by VVB is mandatory at the first verification of a project. We kindly ask that GS4GG considers allowing us and the DOE to use the site visit recordings and checks that were done under the CDM verification process for the current process of transition to GS4GG and GS VER verification. We are using the same DOE as was used in 2021/2022 for CER verification. We have already had a number of site visits during CDM verification with TÜV SÜD South Asia Private Limited for GS11949, including GS11996, GS11998 and GS11999. Thus, the minimum site visit requirements have successfully been fulfilled.

The issue is that each site visit took a long time to set up because of the number of projects and participants involved in the PoA and the frustration of the project owners of potentially having to do this for a third time. I fear this request for a third site visit round will create further delays and could impact our relationship with our project owners who have been patiently waiting for Offsets to support their projects for almost 3 years. Using the site visit recordings and checks that were done under the CDM verification process for the current process of transition to GS4GG and GS VER verification will also allow BWC, the project owners and the VVB to reduce travel time and travel costs, allow VVB to focus on the quality of the audit by reducing the logistical burden of site-visits and to make the audit process more effective and efficient while ensuring and enhancing the integrity of the audit process and the VVB opinion. Other applicable checks will still be done as per Gold Standard for the Global Goals (GS4GG) rules and requirements.

The key principals listed in paragraph 2.1.1 of the Deviation Approval Process version 01 are adhered to.

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 key principals listed in paragraph 2.1.1 of the Deviation Approval Process version 01 are adhered to:

- Environmental integrity: GS VERs will not be overestimated as a result of the deviation, and conservativeness will be ensured. The deviation does not affect the estimation of the GS VERs, the relevant physical project details have been verified by the DOE during the site visits in 2021/2022 while doing CER verification. We kindly ask that GS4GG considers allowing us and the DOE to use the site visit recordings and checks that were done under the CDM verification process for the current process of transition to GS4GG and GS VER verification. Other required remote checks will still be done by the DOE during the GS VER verification.
- Contribution to the Sustainable Development Goals (SDGs): SDG contributions will not be compromised. The deviation does not affect the estimation of the contribution to SDGs.
- Safeguarding principles and requirements: Safeguarding principles and requirements will not be compromised. The deviation does not affect the Safeguarding principles assessment.
- Compliance with host country regulations: The host country regulations will not be compromised. The deviation does not conflict with the host country regulations.

Furthermore:

- Accuracy: The deviation does not affect the accuracy of the measurement and the monitoring plan. All measurement equipment has been duly calibrated, and the calibration certificates have been given to the DOE to verify.
- Completeness and conservativeness: The deviation does not affect the VPA eligibility under the PoA, application of the methodology, additionality, baseline determination and quantification of GHG emission reductions.

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):

Deviation does not impact in any way the PoA or VPA design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. We just kindly ask that GS4GG considers allowing us and the DOE to use the site visit recordings and checks that were done under the CDM verification process for the current process of transition to GS4GG and GS VER verification. All required additional checks will still be done by the DOE as per Gold Standard for the Global Goals (GS4GG) rules and requirements.

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.)*

BWC has uploaded the site visit details into this Dropbox folder in case the Certification Officer would like to see more details:

<https://www.dropbox.com/sh/8wcr2136cepv0j/AABTTybBaCYCI2mAuJI9queaa?dl=0>

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