

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 – 26/09/2023**

**1.2 | Decision**

The deviation request has been approved, as all the documents were submitted to SustainCERT before the end of the CDM crediting period, and the project developer has taken the necessary steps to complete the process on time.

SustainCERT is requested to issue the invoice, and the project developer should make the payment within the defined timeline.

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

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provide 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)

We request that project GS11717 to be allowed to be transferred to Gold Standard. This project was registered with CDM, as project "CPA-MA-25-Madagascar Ethanol Stove Program"

[https://cdm.unfccc.int/ProgrammeOfActivities/cpa\\_db/HCM2W94L3OISJ5A781KXEU6VR0NGBQ/view](https://cdm.unfccc.int/ProgrammeOfActivities/cpa_db/HCM2W94L3OISJ5A781KXEU6VR0NGBQ/view)

The CDM Crediting period ended on 02/08/2023.

The project documents was submitted to SustainCERT and request for Preliminary review and design review prior to the end of the crediting period under CDM.

SustainCERT has informed us that the project cannot be transferred to Gold Standard because the CDM Crediting period has already expired and they have not received payment for the fee for preliminary review prior to the date of the expiry of the CDM Crediting period.

We request that the project is allowed to be transferred from CDM to Gold Standard as if the fee had been paid prior to the expiry of the crediting period, subject to the fee of \$900 is paid within 10 days of a new invoice being submitted to Green Development AS, or within 10 days after a positive reply on this deviation request.

## 2| Background information

We have a PoA registered with CDM. We have a number of CPAs implemented in 4 different countries under this PoA. The CPAs was registered in different times and with different crediting periods.

In April 2021 we started the process of trying to transfer the PoA and the projects from CDM to Gold Standard. The Registration / Design Certification date for the GS PoA was 17/01/2023. The GS ID for the PoA is GS11574.

We have submitted the documentation to SustainCERT for them to carry out combined preliminary review and design review as required for transferring the projects from CDM to Gold Standard. For the project in question this was done before the end of the crediting period under CDM.

We have also submitted a Deviation request for some of our other projects in which the CDM Crediting period ended on 27/08/2021. Gold Standard approved this deviation request, COVID\_Dev 273, and concluded that these projects could be transferred to Gold Standard with a crediting period starting on 28/05/2021, under Gold Standard if a validation site visit for the renewal of the crediting period could be done before 28/05/2023. The verification site visit for these projects was done prior to 28/05/2023. Project GS11717 was however not included in Deviation request, COVID\_DEV 273, as we had assumed that the project GS11717 could be transferred within a year from this process started. We now realized that this was an unrealistic assumption and that we should have understood that it would take more than a year to transfer projects from CDM to Gold Standard.

It should be noted that we have been informed by SustainCERT that an invoice was submitted to us on 29/06/2023 with due date on 13/07/2023. Unfortunately, this was not paid, but we have also not received any follow up from SustainCERT to advise us to make a payment for this invoice, so that we could have paid this invoice before the expiry of the CDM Crediting period (on 02/08/2023). Please note that we have received several 100 emails from SustainCERT including at least 104 emails from SustainCERT since the beginning of June 2023, during the summer holiday, which might be way the invoice was not paid.

Please also know that we have made 13 payments to Gold Standard and Sustain CERT in relation to the transfer of our projects from CDM to Gold Standard. In total we have made a payment of \$157,571.10 so far, even though we have not managed to complete the transfer of any projects to Gold Standard so far during the two years we have tried to do so.

We think that it is strange that SustainCERT or Gold Standard does not follow up with request for payment for new invoices when we did fail to make the payment by the due date. Particularly as this invoice was sent to us as one out of more than 100 emails that was sent to us during the summer holiday and considering that we have already made payments of \$157,571.10 for the transfer of the projects under our program from CDM to Gold Standard. If a follow up reminder of the payment due had been sent to us, we would not have had to invest resources in preparing this Deviation and Gold Standard would not have had to use resources to assess this deviation request.

We would also like to point out that we had been warned about the complexity of transferring the projects from CDM to Gold Standard. Because of this we recommended to Gold Standard during a workshop with Gold Standard, that Gold Standard provided technical assistance for projects that wanted such assistance. We pointed out that we of course would pay for such assistance. Gold Standard did however decide that Gold Standard would not provide such support to projects, even though it is clear that such technical support would not impose a cost to Gold Standard, but would greatly reduce the resources that Gold Standard and SustainCERT needed to use for assessment of documents for transferring the projects to Gold Standard. Such technical support would also have saved us, as a project developer, a lot of time and cost, and would have enabled our project to expand more than what is now the case. Such support would in other words have contributed substantially toward the Sustainable Development Goals. If such support had been made available to us, we feel confident that our projects would all have been transferred to Gold Standard by now, and then this Deviation request would not have had to be part of our process of transferring our projects to Gold Standard.

Deviation Reference Number	DEV_519	
Date of decision	27/09/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	02/09/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input type="checkbox"/> PoA	ID – GS11574
	<input checked="" type="checkbox"/> VPA	ID – GS11717
Project/PoA/VPA title	<ul style="list-style-type: none"> <li>VPA Title: CPA-MA-25-Madagascar Ethanol Stove Program</li> <li>PoA Title: PoA for the Reduction of emission non-renewable fuel from cooking at household level</li> </ul>	
Date of listing	Not applicable	
GS Standard version applicable		
Date of transition to GS4GG (if applicable)	Not applicable	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	<ul style="list-style-type: none"> <li>Creating date on SustainCERT web page is 14/06/2023</li> <li>Date of SustainCERT review preparation in progress from 29/06/2023</li> </ul>	
Date of design certification/inclusion (if applicable)	Not applicable	
Location of project/PoA/VPA	Host country(ies) : Madagascar	
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	Not applicable	
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	Transfer of CDM CPA to Gold Standard for project with expired crediting period	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Not applicable	

Specify the monitoring period for which the request is valid (if applicable)	Start date Not Applicable	End date
Submitted by	Contact person name: Havard Norstebo	
	Email ID: hn@greendevlopment.no	
	Organization: Green Development AS	
	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 checked="" type="checkbox"/> No <input type="checkbox"/>  Project do not need to use VVB for transfer of project to Gold Standard. But a VVB is needed for renewal of the crediting period from 02/08/2023. The validation process is ongoing and validator has already conducted the validation site visit.  If yes; VVB name: Earthood  VVB Staff name(s):	
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Deviation for other projects under the PoA. This referred to the start date of the project.	

### 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):

We request that the project is allowed to be transferred from CDM to Gold Standard even if the crediting period has expired before SustainCERT has received payment for the preliminary review.

We request that the project might have transferred from CDM to Gold Standard as if the preliminary review had been done at the date in which SustainCERT has registered

the preliminary review and design review as "Review preparation in progress", which was on 29/06/2023

<https://platform.sustain-cert.com/certification/projects/2964/reviews>

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 has no impact on the project. The only issue is if the project should be allowed to be transferred from CDM to Gold Standard, even though sustainCERT did not received payment for the combined preliminary review and design review prior to the expiry of the CDM crediting period.

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. A VVB opinion on this is not required, nor do we want to impose the cost of engaging a VVB on the project or on the poor project participating households that benefit from our project. We take into consideration the negative impact this cost would have on the ability of the PoA to contribute to the Sustainable Development Goals.



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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):

The deviation request will have no impact on the project or the project design, on safeguard principles, SDG assessment, emission reduction, monitoring frequency, data quality, potential risk or any other relevant aspect of the project.

#### 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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Not applicable. The deviation request does not require the opinion of a VVP, and the cost of obtaining a opinion from VVB would impose a cost that would negatively impact how the PoA would be able to expand and thereby contribute to the Sustainable Development Goals.

### 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.)*

- CDM CPA DD
- VPA DD
- Payments made to SustainCERT and Gold Standard
- Screenshot of date of start of review preparation by SustainCERT
- COVID\_DEV 273. Approval of start of VPA crediting period for specific VPA DDs.
- Communication with Gold Standard about the need for technical support.

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> <li>- any previous deviations/design changes approved</li> </ul> Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption