



Gold Standard[®]
for the Global Goals

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 25/10/2023

1.2 | Decision

The deviation request is approved.

In this particular instance, the project developer has been granted approval, taking into account that the site visit was conducted four days before the end of the monitoring period.

For all subsequent cases, the project developer and the VVB shall ensure that site visits are carried out after the end of the monitoring period. Any further deviations of this nature shall not be considered.

The project developer shall apply conservative assumptions or discount factors to address the gap (if any) in monitoring to the extent and wherever required, to ensure that GHG emission reductions/SDG impacts will not be overestimated.

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

This request is made since we have been forced to submit deviation and since SC experts would not allow us to proceed otherwise. We are not aware of and deviation and or violation of any rule/requirement.

2| Background information

MP covers 01/11/2020-31/10/2022 dates. Before the site visit, which was conducted on 27/10/2022 with the lead auditor Ms. Seda Atabek, the 1st version of MP had been submitted to VVB using generation data until October 2022. After the site visit, during revisions, generation data for October 2022 became available and we have included this in revised Monitoring report. As per the comment of GS reviewer, we have replied and explained that in our responses. However, although there is no rule violation or deviation, we have been forced to submit deviation. This is a common practice; we have done it many times before. For example, 1st MP of GS7734 has been updated after the site visit, and the verification of the project has been approved by GS without any question. Similarly, generation data of December 2022 has been included after the site visit in the 1st verification of GS5009, which is an approved project. Another example is the change of 1st MP of GS7105. These are just a few recent examples which show that this approach is conservative and recognized many times by GS. Reviewer has referred to articles 5.1.25 & 5.1.26 below, which are not relevant to the comments raised. Although, we cannot see any statement justifying the comment and imposition, we have written this request as SC did not initiate review otherwise.

5.1.25 Verification may start after:

Project has achieved Gold Standard Certified Design status (it may also be combined with validation, see 'Combined Design and Performance Certification'), AND

The Project Developer has contracted an eligible VVB, AND

The Project Developer has submitted the Monitoring Report to the VVB, AND

The Project Developer has notified Gold Standard of the commencement of Verification.

5.1.26 Verification includes a site visit by a VVB who assesses the following against all Gold Standard Requirements including applicable Activity Requirements, Gold Standard Methodology and Product Requirements:

The Monitoring Report (including any updates in Annual Reports)

All supporting evidence and documents included by the Project Developer to demonstrate conformity

Deviation Reference Number	DEV_535	
Date of decision	25/10/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	26/09/2023	
Project/PoA/VPA	Project	ID – 7491
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	ORLEMIS WPP	
Date of listing	17/12/2019	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	-	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	-	
Date of design certification/inclusion (if applicable)	08/04/2021	
Location of project/PoA/VPA	Host country(ies) Turkey	
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	https://registry.goldstandard.org/projects/details/1884	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Monitoring Period	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	There is no rule requirement	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/11/2020 End date 31/10/2022	
Submitted by	Contact person name: M.Kemal Demirkol Email ID: kemal.demirkol@gte.com.tr	

	Organisation: GTE
	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 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):

The reason for requesting deviation is request of SC and reviewer.

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:

3.2.1 | Deviation assessment (to be completed by Project developer):

We have received this comment for the first time in 15 years. In our assessment, it is another bureaucratic request which is time consuming for everyone. Unfortunately, GS/SC has started to request deviations for minor issues. For this case, this is a arbitrary request which has no basis but to be able to proceed, we request deviation.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

The site visit has been done on 27/10/2022 and MP is between 01/11/2020-31/10/2022. The MP data until October had been submitted to VVB before SV. When October data is generated by the EPIAS system it is submitted to VVB. As the meters are sealed and PP can not interfere, it is no source of bias for the sake of verification. Besides, the stakeholders stated that the communication is always positive and we do not expect any critical grievance issue in the last 3 days of MP. VVB therefore kindly requests GS to approve the deviation.

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):

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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
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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