



DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 04/10/2023

1.2 | Decision

The applied deviation request is not approved. As per the requirements of para 5.1.46 of Principle and Requirements, no issuance can be claimed for a period of delay in design certification renewal.

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_536	
Date of decision	04/10/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	26/09/2023	
Project/PoA/VPA	<input type="checkbox"/> Project	ID – GS4962
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Wind Power Project in Madhya Pradesh by OBWPPL	
Date of listing	-	
GS Standard version applicable	Principles & Requirements, version 1.2	
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)	04/06/2018	
Location of project/PoA/VPA	INDIA	
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://platform.sustain-cert.com/public-project/927	
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	Deviation from Principles & Requirements, section 5.1.46 regarding delay in design certification renewal so as to obtain full credits for the 2 nd crediting period of the project (05/05/2023 – 04/05/2028)	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	PRINCIPLES & REQUIREMENTS version 1.2, published in October 2019, section 5 (e) paragraph 5.1.46 indicates "Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay)."
Specify the monitoring period for which the request is valid (if applicable)	Start date End date
Submitted by	Contact person name: Mr. Sumeet Singhvi Email ID: sumeet@infisolutions.org Organization: Infinite Environmental Solutions LLP Project participant: Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> No <input type="checkbox"/>

3 | Deviation detail

3.1 | Description of the deviation:

The project activity “Wind Power Project in Madhya Pradesh by OBWPPL” has been design certified under Gold Standard for Global Goals on 04/06/2018. Under GS the project activity has 15 years of crediting period i.e., first crediting period from 05/05/2016 – 04/05/2023, second crediting period from 05/05/2023 – 04/05/2028 and third crediting period from 05/05/2028 – 04/05/2031.

The project activity has claimed VERs from 01/08/2020 to 31/12/2020. Currently the project is undergoing Crediting Period Renewal no. 01.

For the project, there have been deviations from the guidelines PRINCIPLES & REQUIREMENTS Version 1.2, sections 5.1.45 and 5.1.46 of According to the guidelines, to maintain Gold Standard Certified Project status beyond five years, a Project must undergo Design Certification Renewal. This process should begin no later than the last date of the current certification cycle, as defined by the submission of a Renewal opinion by a VVB (Validation, Verification, and Certification Body) for Design Review to Gold Standard. Note that review of the Design Certification Renewal may complete after the last date of current crediting period. In this case, the renewal date shall be the first day after the end date of the current certification cycle. In light of the challenges described below, we request a deviation to continue revalidation and verification process of the project without any loss of rights regarding VER credits.

However, in this case, the Design Certification Renewal process was not initiated by the last date of the current certification cycle, which ended on 04/05/2023. Instead, the project underwent re-validation on 10/08/2023, which indicates a delay in the completion of the re-validation process beyond the specified timeline.

3.1.1 | Deviation detail (to be completed by Project developer):

The deviation does not attract any kind of risk upon environmental integrity and all the SDG contributions are achieved in-line with the registered PDD.

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

Not applicable

3.2 | Assessment of the deviation:

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

The subject project activity owned by M/s Orange Bercha Wind Power Pvt. Ltd. The project attained Design Certified Status on 04/06/2018. The crediting period 1 of the project activity was 05/05/2016 to 04/05/2023 during certification process and accordingly periodic verification carried out. PP has started VVB appointment process for revalidation and renewal of the crediting. Since the project owner was serious towards renewal of crediting period and the project is compiling all requirements as per GS guideline, the project owner is requesting Gold Standard for allowing the renewal date to be the first day after the end date of the current certification cycle .GS crediting

period cycle will be from 05/05/2023 to 04/05/2028. It is requested to allow GS labelling from 05/05/2023 onwards without any loss of GS labelled credits due to delay in GS RCP submission.

The Deviation happened due to the following reasons-

- **Major Breakdown Issue:**

During renewable of crediting period, the WTG no B-72 was under breakdown due to failure of Blade A Pin Ball Stu and an unscheduled breakdown happened which restored after 271 hours. The generation of the project activity affected & subsequently other month started & PP got busy in preparation of JMRs / Invoices. In restoration & excessive workload at the start of the month, PP missed the deadline & later process of renewal started with delay which resulted in delayed submission to Board as well.

- **Price Increase for VVB and Consultants:**

All prices for VVB and consultants have significantly increased over the past few years. This price escalation is a result of general market trends and inflation. The project developer had faced challenges in finding new consultants who could meet the project's requirements within the budget. This required extensive negotiations, leading to delays in securing suitable expertise at an affordable cost.

- **Site Visit Delays:**

During renewal of crediting period the site visit also faced delays, primarily due to the workload of the VVB. Being responsible for multiple projects simultaneously, the VVB's availability to conduct site visits was constrained. Unfortunately, the project was subject to delays as project developer awaited their turn in the queue for the VVB's site visit, which affected the overall timeline.

- **Decision-making Process and Board Approval:**

Due to the dynamic nature of the carbon market, several significant decisions arose during the certification cycle that warranted careful consideration. To ensure proper governance and mitigate risks, it was necessary to seek approval from our board for these decisions. While this adherence to good governance practices ensured responsible decision-making, it did introduce an additional

layer of time-consuming board approvals, which regrettably contributed to project delays.

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

Not Applicable

3.3 | Impact of the deviation:

3.3.1 | Impact assessment (to be completed by Project developer):

The scope of this project's deviation lies within the "DEVIATION APPROVAL REQUIREMENTS AND PROCEDURES" version 1.2. Throughout the period of delay, the project owner diligently monitored all parameters that were previously validated and approved during the Design Certification process. It is important to note that this deviation will not affect the project design, emission reductions, monitoring frequency, data quality and potential risk or any other relevant aspect of the project and also will not impact the data quality or pose any potential risks to the Gold Standard (GS), including any issuance or material impacts affecting the project's quality. Therefore, there are no potential risks attributed to the GS Project activity specifically.

The above deviation will not cause any impact upon the data quality or attract any potential risk on GS related to any issuance or any other material impact affecting the quality of the project and thus no any potential risk is attributed to GS Project activity in particular. The requested deviation aligns with the Principles and Requirements outlined by GS4GG and demonstrates compliance in the following areas:

Environmental Integrity: The deviation does not result in overestimation of GS Verified Emission Reductions (GSVERs), as conservatism in calculations is ensured.

Contribution to Sustainable Development Goals (SDGs): The project's intended contributions to the SDGs comply with GS4GG requirements, and the deviation does not have any potential impact on the certified SDGs claimed during the current monitoring period.

Safeguarding Principles and Requirements: The deviation does not compromise any of the safeguarding principles and requirements established by GS4GG.

Compliance with Host Country Regulations: The project remains fully compliant with the regulations of the host country, and there are no conflicts arising from the deviation.

The Project Proponent has initiated the process of Design Certification Renewal and commits to adhering to all GS4GG guidelines in the future. It is essential to highlight that the project's low rate of return makes it economically unsustainable without carbon credits. Therefore, the project developer requests this deviation as a means to compensate for the loss of credits.

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

Not Applicable

3.4 | Documents:

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