



**Gold Standard**<sup>®</sup>  
for the Global Goals

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 – 19/12/2023**

**1.2 | Decision**

The deviation request is partially approved, only for this monitoring period, as long as the VVB can demonstrate how, without the presence of the Objective Observer , it was possible to comply with section 11 of Annex B of Microscale Project Requirements.

Compliance with above mentioned paragraph shall be reflected in its Verification report and explain how the remote audit allowed the VVB to reach to a conclusion on its validation and verification.

Additionally, the project developer shall:

- Ensure that a continuity in the Project’s monitoring activities has been maintained and project developer is able to justify that no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). However, if gap(s) exist, the project shall justify that conservative approach(es) have been applied in line with section 3 of the Deviation Approval Requirements and Procedures (version 1.2) and overarching GS principles (as applicable).
- Document the deviation request, its implications, and GS’ decision in the appropriate section of the GS Monitoring Report (for the relevant MP) and the verifying VVB shall, through appropriate means at its disposal, evaluate the Project’s compliance with the above condition and provide its opinion in the Verification Report.
- Ensure that the verification site visit frequency stated under clause 3.1 of the Site Visit and Remote Audit Requirements and Procedures – V2.0 will be followed in the subsequent verifications.

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 Verification Report.

For the purpose of current remote verification, the VVB shall follow requirements, procedures and guidelines stated in Site visit and remote audit requirements and Procedures.

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_543	
Date of decision	19/12/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	09/10/2023	
Project/PoA/VPA	Project	ID - GS11818
	<input type="checkbox"/> PoA	ID - GSXXXX
	<input type="checkbox"/> VPA	ID - GSXXXX
Project/PoA/VPA title	Small Farmers Carbon Farming Project in Taiwan	
Date of listing	08/02/2023	
GS Standard version applicable	Soil Organic Carbon Framework Methodology	
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	Host country(ies) Taiwan	
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/3996">https://registry.goldstandard.org/projects/details/3996</a>	
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	Microscale project requests remote validation and verification procedure by GS objective observer	
Specify applicable rule/requirements/methodolo	MICROSCALE PROJECT REQUIREMENTS, Version 1.2, published October 2019	

<p>gy, with exact paragraph reference and version number</p>	<p>11.1.2 A microscale project must be subjected to an Objective Observer appraisal and site visit at least once within two years of date of Design certification or the start of certification/crediting period, whichever is later.</p> <p>Since COVID-19 caused travel visa issue between Taiwan and China, with no sign of approval date of business traveller visa issuing, the project need to be remote validation and/or verification by GS designated Objective Observer appraisal, rather than a site visit.</p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>Start date 15/02/2024      End date 28/02/2024  <i>Expected Objective Observer appraisal date.</i></p>
<p>Submitted by</p>	<p>Contact person name: Jay Fang</p> <p>Email ID: jay@mihumisang.org</p> <p>Organisation: Eco-affinity Inc.</p> <p>Project participant: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes;  VVB name: CEPRI</p> <p>VVB Staff name(s): Madame Chunyen CHEN</p>
<p>Any previous deviations approved for the same project activity/PoA/VPA(s)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

### 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):

SMALL FARMERS CARBON FARMING PROJECT IN TAIWAN, is a microscale project covers ~300 ha agricultural field in different areas in Taiwan. The project design documents were passed the preliminary review by the SC on 8/2/2023. The PD, Eco-

affinity Inc. works with hundreds of smallholders and look forward get site visit and validation and verification procedures to get the project design validated.

The PD has reviewed all previous projects in Taiwan, mostly VVB is CEPRI. CEPRI is an appropriate VVB since language, culture, climate factors are pretty much similar also with experienced staffs who visited Taiwan for the GS project before, it would be easier to communicate with less deviation across translation.

PD tried to invite CEPRI as the objective observer and CEPRI agreed in early April 2023.

But there is an issue for the business traveler visa. Since early 2020 COVID-19 pandemic blocked most travel between Taiwan and China, the business visa is not able to issue until today and there is no sign to lift this blockade.

PD needs the project design to be validated than can start to invite more small farmers join the project according to the GS4GG Principles and requirements, and Microscale Project Requirements.

According to the Rule "APPLICABILITY OF MINIMUM SITE VISIT REQUIREMENTS BY VVB", Change in Governmental, policy, etc that affect the project implementation and operation is part of Force-Majeure.

<sup>1</sup> **a. Force-Majeure:** Any cause constituting force majeure i.e., an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable. Such events may include, but are not limited to;

- any act of war (whether declared or not), invasion, revolution, insurrection, terrorism, or any other acts of a similar nature or force, that prevents VVB travel to project site
- Natural disaster like flood, earthquake, etc.
- **Change in Governmental requirements, policy, etc that affect the project implementation and operation**
- Any other situation which meets the definition above

Force majeure does not include shortage of personnel, industrial action, economic downfall, sickness of personnel, breach of contract by subcontractors and liquidity or solvency problems.

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.*

It's indeed as PD stated, CEPRI is willing to be the objective observer for the Small Farmers Carbon farming project. If the appraiser/objective observer's business traveler visa issue is not lifted, it will be impossible to do site visit.

### **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):**

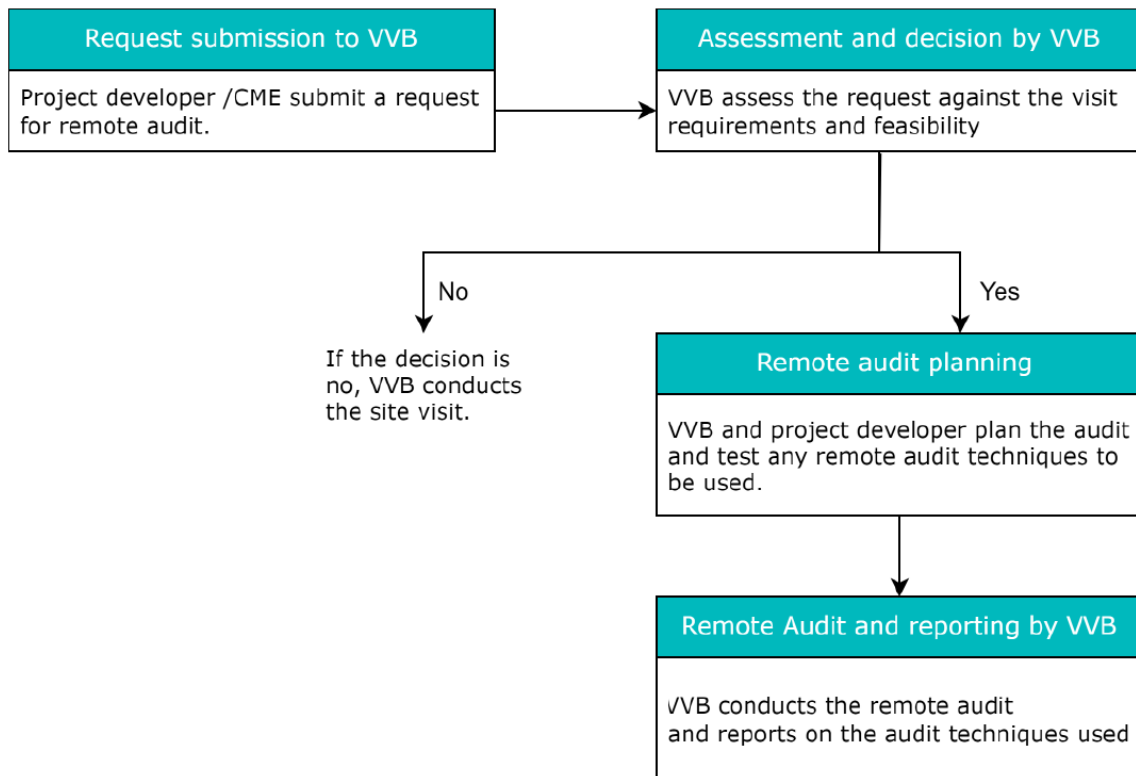
Remote assessment shall follow the "[SITE VISIT AND REMOTE AUDIT REQUIREMENTS AND PROCEDURES](#)" PUBLICATION DATE 30.05.2023

VERSION 2.0, which is a comprehensive guidelines and requirements.

The PD is sophisticated with the ICT (Information Communication Technology) , most of smallholders are using mobile phone to record their project activities. PD is very essay to demonstrate backend data process for the project monitoring plan.

The soil organic carbon samples are tested and determined by government agencies, Taiwan Agricultural Research Institute (TARI) and Agricultural Research and Extension Stations.

According the "Process of conducting a remote audit", PD will use online meeting software, Zoom Meeting, to do onsite visits to the smallholders farms, it will be fully compliance with the objective observer audit plan.



**Figure 1– Process of conducting a remote audit**

**If the business traveler visa issue is resolved, PD will welcome VVB auditor(s) to do site visit timely, within 2 years.**

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.*

First of all, SC had a thorough review process and identified 2 CARs, 6CLs, 1 likely CARs, 5 OBs, and 1 FARs in the first round, then dramatically reduced to 3 FARs in the second round. After directly communicated with Mr. Jay Fang, the PD CEO, who demonstrated sufficient facts and evidence to support their works compliance with the methodology, rules and requirements.

Although on site visit is very important for the validation and verification procedures, but the business traveler visa is a complicated issue, no one can predict when the issue will be resolved.



After discussing with the PD, they have clear design documentation guides their Baseline, Project scenario and monitoring plan. The PD is sophisticated with ICT that we have confidence to have a remote audit for this project.

If the visa issue resolved, VVB will have onsite visit timely within 2 years.

### 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 Small Farmers' Carbon Farming Project is a new kind of agricultural project, not only small farmers, but large farms also/agro business are very interested in the project. Even the prominent Taiwan Semiconductor Manufacturing Company (TSMC) contacted the PD and expressed highly interested in sponsor the project. Without the PDD fully validated and performance verified it still a shortfall of the project.

PD will ensure and safeguard all GS principle and requirements are fulfilled. As a veteran of quality management system, we also realize the site visit still the essential part of the emission reduction projects.

#### 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.*

This is a microscale project, although there are hundreds of project owners, but each small project has clear boundary, procedures, and records with highly developed ICT support. If the electronic data plus remote visit through ICT tools with remote assessment operation procedure, we can validate and verify the project remotely and minimize deviation between on site and remote procedures. If there is any deviation, the follow up site assessment will clarify the deviations.

This is only on deviation of audit procedure, once GS and SC approved, we can proceed a flawless remote audit with ICT tools for this microscale project.

**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> <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