



# 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 – 10/10/2023**

#### **1.2 | Decision**

The deviation request is approved, considering that the project developer submitted the documents for fast-track approval of the VPA within one year of the Project Start Date. This exception is granted based on the evidence and timeline provided by the project developer to ensure the timely completion of the submission process, acknowledging that the delays were beyond the control of the project developer.

The project developer is granted an exception from the 1-year rule for submitting the VPA for preliminary review. The developer may also start the crediting period based on the actual start date of the project VPA(2). Additionally, the VPA may claim retroactive credits starting from the project's start date, i.e., February 21, 2022, provided that the project developer can demonstrate compliance with monitoring requirements.

#### **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_552	
Date of decision	10/10/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	06/10/2023	
Project/PoA/VPA	Project	ID – GSXXXX
	<input checked="" type="checkbox"/> PoA	ID – GS1075
	<input checked="" type="checkbox"/> VPA	ID – GS12011
Project/PoA/VPA title	PoA title: Solar cooking in Chad (PoA) VPA: Solar Cooking in Chad, Touloum (VPA2)	
Date of listing	18/11/2022 (tbc)	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	N/A	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	N/A	
Location of project/PoA/VPA	The Republic of Chad	
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	N/A	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New (VPA) <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project (PoA)	
Title/subject of deviation	Request to allow exception of 1 year rule for submission of preliminary review to allow crediting based on actual start date of the project VPA(2)	
Specify applicable rule/requirements/methodology,	Principles & Requirements. Paragraph 5.1.51. "Retroactive Projects shall submit for Preliminary Review within one year of the Project Start Date."	

with exact paragraph reference and version number	
Specify the monitoring period for which the request is valid (if applicable)	N/A
Submitted by	Contact person name: Olivier Levallois Email ID: o.levallois@hamerkop.co
	Organization: Hamerkop Climate Impacts Ltd
	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:

*\*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 official VPA start date is the **21 of February 2022** and the registration type for this project is retroactive. This is the second VPA (VPA2) to be registered under PoA GS1075. The purpose of the deviation request is to allow the crediting period to be backdated to the project start date, as the first documentation for the inclusion of the VPA was submitted on **November 18, 2022** which is well ahead (3+ months) of the 1 year deadline required by GS4GG.

**This first section (1)** will summarize the history of communication between SustainCert (SC) and HAMERKOP regarding this VPA and highlight the reasons why the initial 1-year period (for submission of first review) was not satisfied. HAMERKOP highlights that the reason this deviation request is necessary (and the 1-year timeline

not satisfied) is because HAMERKOP was operating under the assumption that the VPA2 could proceed to fast-track inclusion under PoA GS1075. **The second part (2)** of this detailed summary will document the more recent communications between HAMERKOP and SC and highlight the request from SC for HAMERKOP to submit a deviation request to allow the crediting period to commence at the time of the project start date.

## Section 1.

**On 18 November 2022**, the inclusion of a 2<sup>nd</sup> VPA (GS 12011 - Solar Cooking in Chad, Touloum) was submitted to SC for inclusion (Design Certification Review). The consultants (HAMERKOP) were aware of the rules that the preliminary review must be submitted within 1 year of the start date of the project (VPA2). As such, the inclusion of the 2<sup>nd</sup> VPA was submitted 3+ months prior to this 1-year deadline. In line with our understanding of the fast-track VPA inclusion rules at the time, it was anticipated that this VPA2 could proceed directly to design certification review and NOT have to undertake another preliminary review (since this VPA is part of the same PoA master project GS1075 and that there was no explicit mention that all older PoA rules – no longer available on GS website - needed to be followed). The consultants highlight the fact that the inconsistent and delayed feedback from SC regarding the status of this VPA-fast track inclusion led HAMERKOP to believe that VPA2 was on track for eligibility within the allotted 1-year timeline. The email communication is summarized as follows:

- **18 November 2023** – HAMERKOP informed SC that VPA2 was created and submitted under fast-track inclusion.
- **4 January 2023** – HAMERKOP had not heard back from SC and sent email to enquire about the timeline.
- **6 January 2023** – SC (Nayan) shared with HAMERKOP the findings of the internal validation and informed the consultants that there would be a remote audit.
- **11 January 2023** – HAMERKOP enquired why the audit plan included a 12-week process given that the VPA2 was submitted under a fast-track process. **Of note:** the inclusion process was submitted 8 weeks prior and nobody at SC informed HAMERKOP that the fast-track process would not be possible.

- **26 January 2023** - SC informed HAMERKOP that the VPA was not eligible to fast-track inclusion (over two months after initial inclusion of VPA2 and the internal validation started)
- **30 January 2023** – HAMERKOP enquired with SC why we had had been working for VVB for over 1 month on the review and only informed now the reason the fast-track process was not eligible. (NO reply from SC).
- **2 February 2023** – remote audit took place.
- **10 February 2023**, SC requested the PD actually undergo a Preliminary Review. After another 2 months of slow and poor communication, SC suddenly decided that there **was another issue** and that the methodology was suddenly no longer applicable for the project, without explanation of the reason the methodology adopted at the PoA level was no longer applicable.
- **6 March 2023** – After a phone call with SC on **February 24, 2023** – SC could not find in the GS rules a clear statement that we had to use the previous PoA rules SC emailed HAMERKOP to inform them they were discussing this internally.
- **28 March 2023** – After waiting for 3 more weeks for feedback from SC, HAMERKOP was informed that GS was still discussing internally.
- **29 March 2023** – HAMERKOP was informed by SC that they had to seek a deviation request based on the methodology applicability.
- **12 June 2023** – HAMERKOP’s deviation request was approved.

As is evident by the above communications, the project filing incurred significant delays due to: **1)** the inability of HAMERKOP to proceed directly to certification review under VPA fast track rule – which led to re-starting the process at the preliminary review stage. **2)** SC informing HAMERKOP that the methodology was suddenly no longer applicable for the project which requires Hamerkop to submit a deviation request.

After all these issues were resolved (deviation request approved, and HAMERKOP understanding the need to restart the process at preliminary review stage), HAMERKOP proceeded to submit the documentation for the preliminary review of VPA2. This documentation was submitted on **July 28<sup>th</sup>, 2023**. Though obviously beyond the 1-year timeline since the start date of the project, HAMERKOP anticipated that due to the nature of the delays incurred, there would be a reasonable and flexible

response from SC and Gold Standard regarding the approval of the preliminary review. Even though we are where well beyond the 1-year timeline, the initial documentation was submitted in **November 2022** (almost 4 months prior to 1 year deadline). Nevertheless, HAMERKOP accepts the necessity to submit this additional deviation request to finally get this project back on track as continued delays have threatened the viability of this project. HAMERKOP highlights that although the documentation for preliminary review were submitted on **July 28, 2023**, there was no response from SC regarding the request until HAMERKOP followed up with SC on **September 6, 2023**. HAMERKOP paid the invoice to kick off the preliminary review on **August 30<sup>th</sup>, 2023**, but **SC (Tijana)** apologized to HAMERKOP and informed them that due to a technical error in the IT platform, the payment was not recorded (again, another delay). HAMERKOP got confirmation that the review had started on **September 10<sup>th</sup>, 2023**.

**On September 18<sup>th</sup>, 2023**, SC informed HAMERKOP that they needed to file a deviation request since the preliminary review had been submitted beyond the accepted 1-year retroactive timeline. The following email communication summarizes the recent communications between HAMERKOP and SC and outlines the justification and invitation by SC to submit a deviation request.

**September 18<sup>th</sup>, 2023**. SC (Quinten) provided HAMERKOP with the following option: *You may request a deviation from the one-year retroactive period, thereby aligning the project start date with February 21, 2022, and the first submission date with July 28, 2023. Subject to deviation approval, you can proceed with the preliminary review.*

**September 19<sup>th</sup>, 2023**. Olivier Levallois (HAMERKOP) explained to SC that HAMERKOP had submitted the original documentation 3+ months prior to deadline (as discussed and detailed above). HAMERKOP highlighted the significant delays already incurred and the fact that HAMERKOP had gone above and beyond the required documentation for the approval of VPA2. HAMERKOP suggested that SC and GS discuss this internally and obtain confirmation that the project had followed the rules and requirements and that the preliminary review requested be BACK DATED to November 2022 due to the situation and delays incurred.

**September 22<sup>nd</sup>, 2023** – SC (Quinten) explained to HAMERKOP that all options were being discussed with GS and that HAMERKOP would be informed of the resolution in short order.

**September 26<sup>th</sup>, 2023** - SC (Quinten) again explains to HAMERKOP that all options were being discussed with GS and that Hamerkop would be informed of the resolution in short order.

**October 4<sup>th</sup>, 2023** – SC informs HAMERKOP that they had received a response from Gold Standard regarding the situation. SC informed that Gold Standard and SC will nonetheless require a deviation request. Gold Standard provided the following instruction: *Considering the VPA history and the ongoing efforts to secure carbon revenue, they see that your project has a valid justification to request a deviation that allows crediting based on the actual start of the project. Therefore, it is recommended that you request a deviation to make an exception to the one-year rule for this VPA.*

SC informed that GS will process the request for deviation from HAMERKOP at their earliest convenience.

In summary, HAMERKOP understands that this deviation request has been proposed as a way to advance the project which will allow for the crediting period to be back dated to the start date of the project, which is February 21<sup>st</sup>, 2022. As such, this deviation request is intended to allow for the preliminary review to proceed almost 1 year after the initial submission of documentation.

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):

**Accuracy:** This deviation request is in accordance with communications between HAMERKOP, SC and the Gold Standard. This request would allow a reasonable and logical deviation to the rules that stipulate that the preliminary review be undertaken within one year of the project start date. As outlined in the communications above, HAMERKOP made a legitimate and sustained attempt to initiate the inclusion of VPA 2 over 3+ months prior to the 1-year deadline. Due to inconsistent and delayed response from SC, HAMERKOP was not able to satisfy the 1-year timeline for back-dated project start date and preliminary review.

Under the PoA GS1075, HAMERKOP has demonstrated a rigorous and thorough understanding of the requirements and processes to undertake a carbon crediting project with the Gold Standard. We approach this process with transparency and with good intentions and we are working hard to satisfy the requirements of SC. Documentation that proves that the project activities began in February 2022 has been previously submitted by HAMERKOP to SC (and subject to a remote audit completed February 2023).

**Completeness:** Nothing in the request impact completeness. The details provided above give a complete account of the communications regarding the undertaking of this deviation request.

**Conservatism:** HAMERKOP believes this request is legitimate and logical and does not pose a risk to the conservatism of the VPA2 emission reductions calculations. HAMERKOP has demonstrated successful (through 5 rounds of internal verification and performance review) adherence to the rules stipulated under SC and GS in the continuation of VPA1 (GS3445 under PoA GS1075) Solar Cooking in Chad, Iridimi. VPA2 in Touloum is identical in scope and size to Iridimi VPA1 and the only difference being it is another refugee camp a short distance away.

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):

The deviation request will have absolutely no impact on safeguarding principles assessment, SDG assessment, emission reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. If this request was not accepted, the project will have to end, as the budget available for this project has already been significantly impacted by the incurred delays. Any further delay will negatively affect the refugees already living in dire circumstances and this will have a significant impact on SDG in the camp (VPA2)

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.)*

- **Email thread 1:** email thread from SC (Quinten) inviting HAMERKOP to submit a deviation request that would allow the crediting period to begin at project start date and for the preliminary review to go forward.
- **Email thread 2:** Previous email chains between SC and the Hamerkop regarding IT delay in preliminary review process
- **PDF doc DEV\_411)** : Previously approved Deviation request for Touloum VPA2- which outlines the history of VPA2 inclusion and delays incurred

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