



DEVIATION REQUEST FORM

PUBLICATION DATE **14.1.2021**

Version **4.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 07/11/2023

1.2 | Decision

The deviation request is approved.

The PD shall ensure that a continuity in the Project's monitoring activities is maintained and PD 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).

The verifying VVB shall confirm that the monitoring approaches are correct and conservative for the emission reduction calculations.

The Project Developer shall clearly document the deviation request, its implications and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned condition and provides its opinion in the Verification 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)

2| Background information

Deviation Reference Number	DEV_559	
Date of decision	07/11/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	25/10/2023	
Project/PoA/VPA	Project	ID – GS3511
Project/PoA/VPA title	49.5 MW Sachal Wind Power Project, Jhampir	
Location of project/PoA/VPA	Pakistan	
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/609	
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	Site visit delay (10 days delay) of VVB due to rejection of Visa application of deputed auditor.	
Specify applicable rule/requirements/methodology and version number	Site-Visit-and-Remote-Audit-Requirements version 2; Rule update – Applicability of minimum site visit requirements by VVB	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/10/2020	End date 31/05/2023
Submitted by	Contact person name: Muhammad Amir	
	Email ID: pd@sedl.pk.com	
	Organisation: Sachal Energy Development (Pvt) Limited	
	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"/> If yes; VVB name: APPLUS+ Certification Auditor name: David Lubanga (Visa Application for on-site visit got rejected from NADRA Pakistan)	

	Auditor name: Raul Mitre (who had the site visit for the project on 11 Oct 2023)
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3| Deviation detail

3.1 | Description of the deviation:

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

The project has been registered as GS CDM since 11/08/2016, with the fixed 10-yr crediting period (11/04/2017-10/04/2027). Since the commercial operation of the project 11/04/2017, the project has GS CERs issuance for the 1st monitoring period (11/04/2017-28/02/2019) and 2nd monitoring period (01/03/2019-30/09/2020) in year 2020 and year 2022 respectively. The site visit was conducted for 1st issuance on 03/04/2019 and the remote auditing (site visit is not possible due to COVID-19) for 2nd issuance on 30/12/2020.

Later, due to the discontinuation of CDM, the project completed transition to GS VER scheme in the last quarter of 2022, soon after, since the project moved from fixed 10-yr crediting period under GS CDM (11/04/2017 - 10/04/2027) to 5-yr crediting period as per Gold Standard which expired on 10/04/2022 and subsequently the project had GS CP renewal for 2nd CP from 11/04/2022 to 10/04/2027. The process of CP Renewal was completed successfully in Jul 2023. Soon after, the project had to initiate the 3rd Issuance process with monitoring period from 01/10/2020 to 31/05/2023 as the onsite visit from VVB had to be ensured before 30/09/2023 as under the Gold Standard a site\visit is mandatory once every three years. As per GS rules, the project developer can only request issuance for the latest three years prior to verification site visit date for which monitoring data can be verified.

Therefore, the process for issuance of the GS VERs was initiated immediately and the agreement was signed at the start of Aug 2023 thus APPLUS+ was hired as VVB for verification of the project. The VVB deputed a resource from Kenya, Mr. David Lubanga in the mid of Aug 2023 to be the lead auditor, who was responsible for verification and on-site visit to project Site. Necessary documents were made available to Mr. David for Visa application and the case was submitted by Mr. David for Business invitation letter provision and Visa application approval but unfortunately due to unforeseen circumstances, the E-bill request (Visa application) was rejected

(relevant notification attached in email for reference) on 11 Sep 2023. VVB immediately started arranging another resource for project developer's Site visit and finally Mr. Raul Mitre got visa and had onsite visit on 11 Oct 2023 successfully for the project.

The project developer appreciates Gold Standard to approve the slight 10 days delay of site visit due to unexpected visa refusal, so that the project developer can verify the MP starting from 01/10/2020.

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 execution of the 3rd Issuance was initiated timely soon after the Crediting Period renewal completion. After signing verification agreement with APPLUS+ as VVB and nomination of lead Auditor Mr. David Lubanga, the Visa application process was initiated promptly. Various documents were requested by Mr. David from the project developer as per the requirements from the VISA application and all the required documents were formulated/arranged for Mr. David so that they can be submitted timely. The entire case for VISA application was submitted but unfortunately, the application was rejected (relevant notification attached in email for reference) and the reasons for rejection were also not highlighted by the Gov of Pakistan's related department.

It is important to highlight that this occurrence of VISA application refusal is out of project developer's control. With the delay of onsite verification, it would delay the verification process, but will not impact the project itself. The actual site verification has been conducted on 11 Oct 2023.

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 monitoring of the project has been conducted in line with registered PDD and monitoring plan. The deviation request has no impact on the project monitoring, SDG impacts of the project during the monitoring period.

3.3.2 | VVB opinion (to be completed by VVB, if applicable):
Not applicable.

3.4 | Documents:

No.	File Name	Remarks
1	Notification of E-Bil (Visa Application) Refusal by NADRA (Gov of Pakistan)	Confidential
2	Email Communication with Auditor (Mr. David) for sharing of Related Documents for VISA Application	Confidential