



# 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 – 15/11/2023**

**1.2 | Decision**

The applied deviation request is approved. However, 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).

PD shall comply with section 3.1 of Site Visit and Remote Audit Requirements and Procedures – V2.0 and conduct a physical site visit no later than 28/03/2024.

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 condition and provide 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

**TEMPLATE - DEVIATION REQUEST FORM V4.0**

Deviation Reference Number	DEV_574	
Date of decision	15/11/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	23/10/2023	
Project/PoA/VPA	Project	ID – GS11307
Project/PoA/VPA title	Sapphire 49.5MW Wind Farm Project	
Date of listing	28 <sup>th</sup> March 2022	
GS Standard version applicable	V1.2	
Date of transition to GS4GG (if applicable)	May 2023 (GS CDM to GS VER)	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	March 2022 (from CDM)	
Date of design certification/inclusion (if applicable)	28 <sup>th</sup> March 2022	
Location of project/PoA/VPA	Islamic Republic of 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	<a href="https://registry.goldstandard.org/projects/details/3328">https://registry.goldstandard.org/projects/details/3328</a>	
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 to Physical Site Visit Requirement	

<p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p>	<p>Paragraph 3.1 of Site Visit and Remote Audit Requirements and Procedures:</p> <p><b>3.1   Frequency of physical site visits<sup>2</sup></b>                  3.1.1   At minimum, the VVB shall <b>conduct physical site visit</b> within two years of project start date<sup>3</sup>; and                  3.1.2   Once within every three years after the first physical site visit date</p> <p>From:  <a href="https://globalgoals.goldstandard.org/standards/112_V2.0_PAR_Site-Visit-and-Remote-Audit-Requirements.pdf">https://globalgoals.goldstandard.org/standards/112_V2.0_PAR_Site-Visit-and-Remote-Audit-Requirements.pdf</a></p> <p>Paragraph 2.2.3 of Applicability of Minimum Site Visit Requirements by VVB</p> <p>2.2.3   <b>Follow-up site visits</b> – In case follow-up site visits are not conducted within three years after the previous site visit, and the delays were due to:                  i. Force Majeure, the VVB shall submit a request for deviation to Gold Standard.</p> <p>From: <a href="https://globalgoals.goldstandard.org/ru-2021-applicability-of-minimum-site-visit-requirements-by-vvb/">https://globalgoals.goldstandard.org/ru-2021-applicability-of-minimum-site-visit-requirements-by-vvb/</a></p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>Start date 1/1/2021      End date 31/12/2022</p>
<p>Submitted by</p>	<p>Contact person name: Fahd Naeem</p> <p>Email ID: Fahd.Naeem@sapphiretextiles.com.pk</p> <p>Organisation: Sapphire Wind Power Co. Ltd.</p> <p>Project participant: Yes <input checked="" type="checkbox"/> No <input 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 type="checkbox"/> No <input type="checkbox"/></p> <p>If yes;                  VVB name:                  VVB Staff name(s):</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):

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This project was registered in Gold Standard in March 2022 and transitioned from GS CDM to GS VER project in May 2023.

Verification of the previous monitoring period under CDM (period 2, 2018 - 2020) was conducted remotely in 2021 and GS project validation was then conducted remotely in 2022. The remote site visits were necessary due to COVID and related visa issues for verifiers. There is now potentially an issue in relation to the requirement for physical site visits once every three years, noting that under GS, Sapphire has never had a 'first physical site visit' (re: Section 3.1.2 of [Site Visit and Remote Audit Requirements](#)).

The project developers are seeking a deviation to the requirement for a physical follow up site visit once every three years, as there were delays throughout the 2020-2022 period due to COVID, which is a force majeure event (re Section 2.2.3). The changes have occurred due to reasons beyond our control, but this change was temporary in nature and the project will revert back to the stated requirements for the next monitoring period.

##### 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):

The deviation is due to a force majeure event for a follow up site visit. As at 2.2.3 of Applicability of Minimum Site Visit Requirements by VVB, the VVB shall submit a request for deviation to Gold Standard.

#### 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.*

According to Site Visit and Remote requirements and procedures (V2.0, 30/05/2023) and as described by the PP, the project activity could not comply with the requirement of frequency of physical site visit which states that physical site visit shall take place (3.1) under the following conditions:

- Within 2 years of project start date;
- Once within every three years after first physical site visit.

For the first condition, the project start date (PSD) occurred on 28/08/2011, according to the registered GS PDD (version 3.2, 17/03/2022). As the project was previously registered on the CDM, thus, the PSD occurred previous the GS registration date (04/02/2022). Hence, first condition was not applicable to the project activity.

For the second condition, this has not taken place as no first site visit have occurred yet.

Furthermore, as 3.2 of the same Site Visit and Remote requirements and procedures:

- A physical site visit by VVB is mandatory at the first verification of the project



As the previous verification was the first one to be done, and it was not possible to take place on site due to COVID and it was done remotely (11/04/2022), this condition was also not possible to be fulfilled.

Furthermore, according to the rule update Applicability of minimum site visit requirements by VVB (16/08/2021), as the previous verification which was the first one was not possible to take place due to COVID, this is considered as force majeure as it was an event beyond the control of the project developer and not involving developer's fault or negligence and not foreseeable. Hence, deviation to the GS shall be submitted.

Concluding, it is VVB understanding that the PP took the right decision to perform the current 2<sup>nd</sup> verification physically on the project site. The Verification team was on site on 11<sup>th</sup> of October 2023. The current verification is still on going. Thus, the deviation was due to circumstances out of control of the PP and therefore, it is VVB opinion that requesting approval of such deviation to the GS was the right decision.

### 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 does not materially impact the project design, safeguards, SDGs, emission reductions, monitoring frequency or data quality. It does not pose potential risks to the project.

#### 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.*

It is VVB opinion that the impact in postpone the first on site physically visit does not materially impact the project design, safeguards, SDGs, emission reductions, monitoring frequency or data quality. First of all, the PP did not have a choice to perform the first (previous) verification on site due to COVID constrains and GS allowed at that time to perform remote assessments. Second, during the current verification (2<sup>nd</sup>), the Verification Team could check the project design, safeguards, SDGs, emission reductions, monitoring frequency and data quality. No discrepancies were identified so far but the verification is still on going and at the time of submission of this deviation request, the Technical Review of the verification is under way.

**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