



# 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 – dd/mm/yyyy**

09/07/2024

#### 1.2 | **Decision**

The Deviation Request is Not Approved.

CME shall note that the Rule Clarification has been issued for the Regular VPAs and not in contradiction to Gold Standard P&R v1.2.p. 4.1.49 and 4.1.50, which is for Retroactive VPAs. 11 Regular VPAs shall be included in the design certified Real case VPA, and hence the requirement as per the Rule Clarification REGULAR VPAs – DEFINITION OF THE FIRST SUBMISSION V1.0 shall have to be followed.

#### 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_733	
Date of decision	09/07/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	17/04/2024	
Project/PoA/VPA	Project	N/A
	<input checked="" type="checkbox"/> PoA	ID – GS12051
	<input checked="" type="checkbox"/> VPA	ID – GS11743 CCC VPA-1 (real-case VPA) ID – GS11800 Baucau (regular-case VPA) ID – GS11801 Liquica (regular-case VPA) ID – GSxxxxx Laga (regular-case VPA; not yet submitted) ID – GSxxxxx Lautem (regular-case VPA; not yet submitted) ID – GSxxxxx Lospalos (regular-case VPA; not yet submitted) ID – GSxxxxx Quelicai (regular-case VPA; not yet submitted) ID – GSxxxxx Uatucarbau (regular-case VPA; not yet submitted) ID – GSxxxxx Viqueque (regular-case VPA; not yet submitted) ID – GSxxxxx Watulari (regular-case VPA; not yet submitted) ID – GSxxxxx Iliomar (regular-case VPA; not yet submitted)

Project/PoA/VPA title	GS12051 (PoA): Rai Matak (Green Lands) Programme: Carbon Sequestration for Timor-Leste
Date of listing	21-02-2023
GS Standard version applicable	A/R GHG Emissions Reduction and Sequestration Methodology Version 2.0 (26-10-2022). LUF Activity Requirements Version 1.2.1 (Apr-2020). PAR Principles & Requirements Version 1.2 (Oct-2019). POA Requirements & Procedures Version 2.0 (05-05-2022).
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	Timor Leste
Scale of the project/PoA/VPA	<input checked="" type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale
Gold Standard Impact Registry link of the project/PoA/VPA	GS12051 (PoA): <a href="https://registry.goldstandard.org/projects/details/4093">https://registry.goldstandard.org/projects/details/4093</a> GS11743 (real-case VPA): <a href="https://registry.goldstandard.org/projects/details/4094">https://registry.goldstandard.org/projects/details/4094</a>
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input checked="" type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project
Title/subject of deviation	Deviation from Rule Clarification (release date 22-02-2024), requiring first submission of regular VPAs to be within one year of the regular VPA start date.

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Paragraph 1.1.3 of the Rule Clarification: Regular VPAs – Definition of the First Submission (V1.0; 22-02-2024). Paragraph 4.1.49 of the PAR Principles & Requirements (V1.2; Oct 2019).
Specify the monitoring period for which the request is valid (if applicable)	N/A
Submitted by	Contact person name: Sahe Da Silva Email ID: sahe@frm.tl
	Organisation: Foundation Rai Matak (Project Proponent / CME)
	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).	N/A
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No <input checked="" 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):

Rai Matak (Green Land in Tetum) is a community agroforestry project in Timor Leste; the project supports smallholder farmers to plant and maintain trees on their land with annual tree payments financed by carbon revenues. The project equips farmers with practical training in agroforestry, builds green economies and more resilient communities.

Rai Matak builds on the success of the WithOneSeed project, established more than 10 years ago (project activities commenced in 2009) and located in the sub-district of Baguia, Timor Leste. Certified under the Gold Standard (GS4210), the WithOneSeed

project has recruited over 900 smallholder farmers, planting and maintaining over 400,000 trees and issuing 79,779 VERs to date.

Building on this success, Rai Matak has been designed to implement a national scale-up of activities; to establish a Gold Standard certified Program of Activities (PoA) which will include VPAs across selected sub-districts in Timor Leste.

Activities (namely, tree planting) commenced in eleven VPAs from 2020. Prior to commencement, community stakeholder consultation occurred between 2017-ongoing, servicing all eleven VPAs.

In February 2023, CME submitted to Gold Standard for validation, the PoA (GS12051), as well as the first tranche of VPAs including the real-case VPA (GS11743; Covalima), and two regular-case VPAs (GS11800 and GS11801 in the Liquica and Baucau sub-districts, respectively). The PoA, real-case VPA and two corresponding regular-case VPAs are part-way through validation with the VVB. The remaining eight regular-case VPAs were intended for inclusion at a later time, following the appropriate inclusion pathway as detailed in Section 8.4 of the POA Requirements & Procedures (V2.0; 05-05-2022).

All eleven proposed VPAs have a start date from 2020, corresponding to the first trees planted under the Program and consistent with the LUF Activity Requirements (V1.2.1). Given that stakeholder consultation was conducted prior to the Project Start Date, all eleven proposed VPAs are considered Regular VPAs (not Retroactive VPAs) in accordance with the Principles and Requirements (PAR V1.2; s4.1.42).

The PAR (V1.2; s4.1.49/50) requires that Retroactive Projects (or VPAs) must submit required documents to GS for preliminary review within one year of its Start Date. As such, the CME has made key operational decisions regarding the Rai Matak Program and timing of submission, on the basis that these requirements do not apply given the VPAs are Regular VPAs, not Retroactive.

A Rule Clarification published on 22 February 2024, is in contradiction with the Gold Standard PAR (V1.2; s4.1.49/50), by expanding the requirement that Regular VPAs

(in addition to Retroactive VPAs) must make first submission within one year of the Start Date.

We note this Rule Clarification and commit to ensure that future VPA inclusion will be within one year of their start date. However, we request a deviation to this Rule Clarification for the eleven proposed VPAs under the Rai Matak Program.

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):

This deviation request ensures the Rai Matak Program maintains compliance with the PAR (V1.2), which is the relevant Gold Standard Principles and Requirements version as at the time of Program submission in February 2023. Outside of the eleven already-planned VPAs, the Rai Matak is committed to ensure future VPAs submitted under the Program shall be in compliance with the Rule Clarification, published on 22 February 2024.

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):

**Gold Standard**

There will be no impact of the deviation request on the quality and integrity of the VPAs included within the PoA or their associated emission reductions. Each of the eleven VPAs have been designed and implemented in line with all Gold Standard requirements. As noted above, moving forward the CME will ensure that all future VPAs will be included within one year of their respective start date in line with the recent rule clarification.

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.)*

Version number	Release date	Description
5	11.04.2022	Additional information added: - 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