

RULE UPDATE

COVID 19: INTERIM MEASURES

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VALID UP TO **30+06+2.2022+**

SUMMARY

Gold Standard acknowledges the potential disruptions faced by projects in light of restricted global movement, especially for important upcoming milestones like stakeholder consultations, scheduled monitoring activities and on-site validation or verification audits by Validation and Verification Bodies (VVBs).

In April 2020, the Gold Standard Technical Advisory Committee approved guidance on measures that can be adopted by projects to ensure that they are not adversely impacted during the duration of this crisis, while still maintaining credibility and rigour.

The Gold Standard is continuously monitoring the COVID-19 situation across the world and may extend; or update these Interim Measures as necessary considering how the pandemic develops and affects countries, regions and geographies to different degrees at different times.

Interim measures have been extended from ~~31/01/2021~~ to ~~30/06/2021~~. For deviations already approved with earlier COVID-19 interim measures, the end-dates are automatically allowed to be extended to ~~30/06/2021~~. Any queries on the potential impact on deviations already approved for projects under these interim measures can be sent to – covid19@goldstandard.org

Note that deviations concerning [Section 2.0 Stakeholder Consultations](#) and [Section 4.0 MANDATORY SITE VISITS BY VVBs](#) do not need prior approval from Gold Standard Secretariat.

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1.0 RATIONALE AND TARGET AUDIENCE

1.1 | RATIONALE

1.1.1 | Due to COVID-19 outbreak and subsequent travel restrictions announced by many countries, Gold Standard recognises the associated challenges for projects, developers and Validation and Verification Bodies (VVBs). Gold Standard is committed to support projects, developers and VVBs in these circumstances. These Interim Measures aim to provide flexibility with different steps of the Gold Standard certification cycle without compromising the quality and rigour of the Standard.

1.2 | TARGET AUDIENCE

1.2.1 | The Gold Standard announces the following guidance for project developers, VVBs and [SustainCERT](#) on how project implementation & audit requirements may be managed in the interim period.

2.0 STAKEHOLDER CONSULTATIONS

The project developer may apply the following Interim Measures in cases where physical stakeholder consultation meetings cannot reasonably be conducted by projects due to COVID-19, and the projects are submitted for preliminary review and design/performance certification before the end date of the validity period of this guidance.

2.1 | ALTERNATIVE MEASURES

2.1.1 | The project developer may postpone physical stakeholder consultation meetings and the Stakeholder Feedback Round (SFR) for Gold Standard project/POA/VPAs until the COVID-19 situation eases. The project developer may carry out the physical meeting and SFR after the project achieves listing/design certification (please refer to sections 2.2 to 2.4 below for relevant requirements). However, PoA Design Consultations shall proceed as normal since these consultations do not necessarily require a physical meeting.

~~2.1.1~~2.1.2 | If the project developer postpones the physical meeting and SFR, they shall carry out a remote physical stakeholder consultation meeting using appropriate means (like teleconferencing, video conferencing etc.). Moreover, the project developer shall also carry out a physical meeting and SFR as soon as the situation allows.

Commented [KS1]: As the latest requirements (currently under public consultation) will not be ready in time for the publication of this doc, does the revised footnote 1 below make sense?

Commented [VT2R1]: OK

2.2 | REQUIREMENTS

~~2.2.1~~ | If the project developer postpones the physical meeting, they shall carry out the physical stakeholder consultation meeting and SFR at a later stage¹, as soon as the situation allows.

~~2.2.1~~~~2.2.2~~ | The project developer shall, in light of the evolving global and local COVID-19 situation and its impacts, provide valid justification for not being able to carry out the physical meeting before submission for preliminary review/design certification in the relevant section of the PDD and/or MR (as applicable).

~~2.2.3~~ | The project developer shall, through valid remote/online means, invite stakeholder comments on various aspects of the project (like design, implementation/operation, potential/real impacts etc.) and address them accordingly (please refer to paragraph 2.2.5 below for further details). This period of inviting stakeholder feedback (in case of the inability of carrying out a physical meeting before design certification) shall be open for a period of one month.

~~2.2.2~~~~2.2.4~~ | The project developer shall set up a continuous input and grievance mechanism before starting the validation of the project (i.e., official submission of project design documents to the validating VVB), in line with the requirements prescribed in Section 7 of the GS Stakeholder Consultation and Engagement Requirements. The stakeholders, especially communities around the project site, should be informed about the grievance mechanism and available methods for sharing inputs and concerns.

~~2.2.3~~~~2.2.5~~ | Relevant comments received on the project design, sustainable development assessment and safeguarding principles etc., during the delayed physical stakeholder consultation meeting, shall be accounted for and reflected in the project documentation. The project developer shall note that they may be required to retroactively modify the project design, safeguarding principles and SDG impact parameters (which may, for instance, involve retroactively reducing the amount of emissions reductions/impact statements issued in first verification as a result of the project design changes) based on all relevant feedback received from stakeholders during the delayed physical stakeholder consultation meeting and SFR.

2.3 | SUBMISSION OF STAKEHOLDER CONSULTATION REPORT

2.3.1 | The project developer may submit the project/CPA/VPA for preliminary review without conducting the physical meeting and SFR.

~~2.3.2~~ | If the project developer postpones the physical meeting, they shall submit the draft stakeholder consultation report with self-assessment of Sustainable

Commented [VT3]: Why three months? Would not it increase the timeline as PD has to do it twice. Or are we saying you do it remotely and no future consultation will be needed.

Commented [KS4R3]: revised to 1 month, as discussed

¹ The postponed physical stakeholder consultation and SFR shall be carried out in line with the latest Gold Standard Stakeholder Consultation and Engagement Requirements available here (Version 1.2 dated October 2019).

Development Goals (SDGs) and safeguards assessment with other required documents for preliminary review and design certification, as applicable.

~~2.3.2~~ 2.3.3 | The project developer shall prepare a final stakeholder consultation report after carrying out the physical meeting (whenever possible) and shall submit it for review by the VVB during the current or next review instance (as applicable).

2.4 | GUIDELINES FOR VVBs AND SUSTAINCERT

2.4.1 | The validating VVB shall, through appropriate means at their disposal, evaluate the project developer's justification for carrying out a delayed physical meeting after preliminary review/design certification and provide their opinion in the validation report.

2.4.2 | The VVB shall at each review instance (as many as needed till physical meeting), based on their assessment of global and local situation concerning the COVID-19 pandemic and its impacts, suggest to the project developer² whether a physical meeting can be conducted during the current or next review instance (i.e., first or next verification, as applicable). The VVB shall provide their opinion in writing to the project developer (via an email and/or draft validation/verification report) and shall also keep SustainCert informed of their conclusion. Moreover, VVB should seek stakeholder's opinion as part of each audit instance and recommend actions to the project developer in case any issue is identified.

2.4.3 | In case the VVB concludes that the physical meeting can be carried out, it shall raise a FAR requiring the PD to carry out the physical meeting before or during the next review instance (first or next verification, as applicable).

~~2.4.1~~ 2.4.4 | The VVBs and/or SustainCert shall, through appropriate means at their disposal, seek feedback from relevant stakeholders on the grievance mechanism, safeguarding principles and sustainable development assessment during the remote audit/review process. Feedback shall be communicated to the project developer and addressed by them, as necessary. If applicable, the VVB shall further evaluate project developer's addressal of stakeholder feedback, if any, and provide their opinion in the validation/verification report.

3.0 MONITORING REQUIREMENTS:

COVID-19 may affect ongoing monitoring activities, and projects could face difficulties in conducting monitoring as per the registered monitoring plan.

3.1 | ALTERNATIVE MEASURES

3.1.1 | The project developer may seek deviations from the registered monitoring plan on a case by case basis for the interim period:

² It should be noted that the project developer is not required to wait for the VVB's assessment and may carry out the physical stakeholder consultation, whenever possible. It is advised that, for conducting the physical meeting, the project developer makes themselves fully aware of the COVID-19 situation and takes all necessary COVID-19 precautions during the physical meeting.

- a. **Alternative monitoring approach:** The project developer may propose an alternative monitoring approach/arrangement. For example, the project developer may seek deviation to apply technology³ based remote monitoring (through remote sensing, relevant proxy remote-monitorable data etc.), which enables the project to meet the monitoring requirements while ensuring completeness and conservativeness of the monitored parameters.
- b. **Postpone monitoring:** The project developer may seek deviation to suspend the monitoring until the end of the validity period of the Interim Measures. The project shall be able to complete the monitoring at a later stage and/or apply credible, conservative assumptions or discount factors to the extent required to ensure that GHG emission reductions or removals will not be overestimated as a result of the postponement of monitoring. For example, where possible, monitoring can be done retrospectively (where data is recorded by the project but must be downloaded), or through interpolation of the monitoring period. For interpolations, a reasonable discount factor (for example, 20% reduction on metrics) should be applied to account for higher uncertainty.
- c. **Gap in Monitoring:** The project developer may seek approval for a 'gap' period in monitoring until the end of validity period of interim measures and extend the current project crediting period by a period equal to the gap period.

3.2 | REQUIREMENTS

3.2.1 | The project developer can only request the above deviations for monitoring during the period of the Interim Measures (this guidance).

3.2.2 | The project developer shall:

- Submit the deviation request before the end of the validity period of Interim Measures.
- Clearly state the start and end date of the monitoring period for which deviation applies. Where the end date of deviation is not known at the time of application and is intended to be the end date of the Interim Measures, the deviation request should state 'End of Interim Measures'. The monitoring deviation will end 28 calendar days from the Gold Standard declared end date of the Interim Measures. Project proponents that can re-establish monitoring sooner, may revert to the original registered

³ The developer and VVBs may refer to example cases available at

<https://www.climateledger.org/en/Knowledge.25.html>

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monitoring plan sooner, clearly reporting the change date from interim to registered monitoring.

3.3 | SUBMISSION OF DEVIATION REQUEST

3.3.1 | When seeking deviations on account of all three approaches listed above, the project developer shall complete the [Deviation Request Form](#) and send to Gold Standard at "covid19@goldstandard.org".

3.4 | GUIDELINES FOR VVBs AND SUSTAINCERT

3.4.1 | In case of paragraph 3.1.1 b, the VVBs and SustainCERT shall determine whether the project has applied sufficiently conservative values and/or approach for the monitoring period for which the postponement applies.

4.0 MANDATORY SITE VISITS BY VVBs:

The Validation and Verification bodies & SustainCERT⁴ may apply the following interim measures in cases where on-site inspections cannot reasonably be performed due to COVID-19 and travel restrictions.

4.1 | ALTERNATIVE MEASURES

4.1.1 | Alternative Measures relating to mandatory on-site visits for VVBs audits include:

- a. A VVB may postpone site visits for on-site inspections, taking into account the rules of relevant national and local authorities (local to the DOE offices as well as to locality of the site visits), World Health Organization (WHO) recommendations, policies of the VVB (if any) and other relevant travel restrictions and guidance (for example, a requirement to self-isolation upon return from specific countries).
- b. If site visit cannot be postponed due to significant impact of delaying the site visit on VVB and/or project developer due to timeline/commitment as per validation/verification or GS-VERs delivery agreement, VVB may replace mandatory on-site visits with remote audits. The audit may include but not limited to validation, verification, the inclusion of VPAs, design change review etc.

4.2 | REQUIREMENTS

4.2.1 | In case of 4.1.1 a the VVB shall complete the on-site inspection as normal when the COVID-19 situation eases.

4.2.2 | In case of 4.1.1 b the VVB shall ensure the completeness and conservativeness of the monitored parameters at the time of verification. In doing so, it shall:

⁴ For microscale project/PoAs/VPAs

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- i. Use validation/verification techniques and advanced communication technology solutions to validate/verify information and compliance with applicable requirements to the extent possible, to ensure the completeness and credibility of the audit;
- ii. Use means such as, but not limited to, tele/video meetings; interviews with relevant stakeholders, local authorities, project participants, persons responsible for data collections, end user and/or beneficiaries of the project; photographic evidence, video recordings; data collection using drones, satellite image (where possible); relevant documents; and other publicly available information.
- iii. Transparently disclose in the audit report that
 - a. The audit is undertaken remotely and
 - b. Describe the alternative means used and justification that they are sufficient for the audit
- iv. Must submit the audit report requesting design certification and/or performance certification within six (6) months of the declared end date of the Interim Measures.

4.3 | GUIDELINES FOR VVBs

- 4.3.1 | The maximum monitoring period that VVB can verify based on remote audit (paragraph 4.1.1 b) is two years.
- 4.3.2 | In cases of apparent malfeasance observed/identified at a later stage, Gold Standard retains the right to take retrospective action including retracting issued VERs, suspending project registration and/or withdrawing the accreditation of the VVB.

5.0 SUBMISSION TIMELINES:

5.1 | EXTENSION REQUEST

- 5.1.1 | Where project submission timelines are affected by COVID-19, the project developer may seek an extension by submitting a request to Gold Standard. It includes but is not limited to the following key submission stages:
 - Submission of the project within one year of start date;
 - Successful completion of validation within two years of the date of project Listing;
 - Completion of first verification within two years (5 years in case of A/R) of project implementation date or design certification or design certification renewal, whichever is later;
 - Submission of design review no later than the last date of current certification cycle;
 - Claiming retroactive crediting (extension of retroactive crediting period to cover delays in addition to maximum allowed period of 2 years);
 - Submission of annual report.

5.2 | REQUIREMENTS

- 5.2.1 | When seeking extensions, the project developer shall demonstrate with evidence (such as public statements from relevant authorities on travel restrictions) that the project submission is affected due to COVID-19. For example, the project must be able to demonstrate that all the necessary actions for submission of the project within the first year of start date were taken and evidence such as proof of stakeholder engagement, agreement with VVBs, etc. are available to validate the claim.
- 5.2.2 | Extension requests shall be submitted before the declared end date of these Interim Measures.

5.3 | SUBMISSION OF EXTENSION REQUEST

- 5.3.1 | The project developer shall complete the [Deviation Request Form](#) and send the request to Gold Standard at "covid19@goldstandard.org".

6.0 FURTHER SUGGESTIONS

The Gold Standard encourages all stakeholders, including project developers, VVBs, practitioners and other interested parties to send suggestions on alternative measures and means that can be used to facilitate the stakeholder consultations, monitoring, validation & verification to support Gold Standard projects. Please send your suggestions to Gold Standard at "covid19@goldstandard.org".

ANNEX - 1 RECOMMENDED VALIDATION/VERIFICATION TECHNIQUES

In assessing the information, the VVB shall apply the means of validation and verification, including, but not limited to:

- i. Cross checks between information provided in the PDD/PoA-DD/Monitoring report and information from third-party or publicly available sources other than those used; if available, the DOE’s sectoral or local expertise; and, if necessary, independent background investigations.
- ii. Telephone, video or email interviews with relevant stakeholders in the host country, such as personnel with knowledge of the Project/PoA design and implementation;
- iii. Cross checks between the information provided by interviewed personnel (i.e. by checking sources or other interviews) to ensure that no relevant information has been omitted;
- iv. Reference to available information relating [Annex -1 Recommended validation techniques](#) to assess programme, projects or technologies similar to the proposed Project/PoA under validation/verification;
- v. Review, based on the selected methodologies, the selected standardised baselines and other applied methodological regulatory documents, of the appropriateness of formulae and accuracy of calculations;
- vi. Where no means of validation/verification is specified, the VVB shall apply the standard auditing techniques. The VVB may use other standard auditing techniques for validation or verification, as referred to in sections 7.1.3 and 9.1.3 of the [CDM VVS-PA](#) and sections 7.1.3 and 10.1.3 of the [CDM VVS-PoA](#).
- vii. Reference to recently released [ISO](#) and [ISEAL](#) guidance documents for carrying out remote audits without compromising the reliability and effectiveness of the certification process.

Document Revision History

Version number	Release date
Version 5.0 (Current version)	DD/MM/2021
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