

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Reconsideration Decision

1.1 | Date – 12/12/2023

1.2 | Decision

The Secretariat would like to thank the project developer for their submission. After carefully considering the request and supporting documents, the Technical Advisory Committee (TAC) has concluded that the request cannot be accepted. TAC acknowledges the challenges faced by the project developer. However, complying with site visit requirements is crucial to ensure the integrity and rigor of the certification process.

Despite the significant impact of the COVID pandemic on operations, measures were promptly implemented by the standards to assist project developers in maintaining compliance and continuity. The introduction of remote audits in early 2020 provided an opportunity for project developers to meet requirements. It is important to note that the majority of the monitoring period occurred prior to the COVID period, indicating that delays cannot be solely attributed to the pandemic. After careful consideration of the evidence provided and the available options, the TAC has

concluded that the reconsideration request cannot be accepted. The decision made by SustainCERT stands as final, as outlined in the deviation request form.

1.2.2. | Original deviation decision upheld:

The deviation request is partially approved.

The deviation regarding conducting the site visit after 3 years of the previous one due to Covid-19 situation is approved.

However, PD has to comply with the Site Visit and Remote Audit Requirements and Procedures §3.1.1 b), the duration of the GS monitoring period is not more than three years from the date of remote/physical site visit by a VVB. For example, if the site visit was concluded on 16/12/2021, the MP cannot start before 16/12/2018. Achieved emission reductions before this date cannot be claimed/issued.

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

2| Background information

Deviation Reference Number	DEV_COVID_360	
Reconsideration Reference Number	REC_DEV_360_COVID	
Date of original decision	11/07/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	30/05/2023	
Date of submission for reconsideration	08/09/2023	
Project/PoA/VPA	Project	ID – GS5099
	☐ PoA	ID – GSXXXX
	☐ VPA	ID – GSXXXX
Project/PoA/VPA title	Greentech' Emission Reductions from PET Recycling, Romania	
Date of listing	07/12/2018	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	28/05/2021	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	23/05/2019	
Location of project/PoA/VPA	Host country(ies): Romania	
Scale of the project/PoA/VPA	☐ Microscale ☒ Small scale ☐ Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/1640	
Status of the project/PoA/VPA	☐ New ☐ Listed ☐ Certified design ☒ Certified project	
Title/subject of deviation	Request regarding the online audit due to Covid19 restrictions	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	As per the GS document "Site Visit and Remote Audit Requirements and Procedures"_v1.0, paragraph 3.1.1.b: "3 MINIMUM PHYSICAL SITE VISIT REQUIREMENTS 3.1 Frequency of physical site visits² 3.1.1 At minimum, the VVB³ shall conduct physical site visit a. Within two years of project start date⁴; and b. Once every three years after the first physical site visit" For the current verification i.e second verification, physical onsite was not possible due to travel restriction due to COVID situation. The remote auditing was conducted on 16th December 2021. For the current verification, onsite should have happened before 20th February 2021 as per the rule above 3.1.1.b since the first physical site visit for the first verification was on 20th February 2018.
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/02/2018 End date 31/12/2020
Submitted by	Contact person name: Casiana Fometescu Email ID: casiana@carbonexpert.ro Organisation: Carbon Expert International Srl. Project participant: Yes ☒ No ☐
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes ☒ No ☐ If yes; VVB name: Epic Sustainability VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☒ No ☐

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):

As explained above, as per the GS document "Site Visit and Remote Audit Requirements and Procedures"_v1.0, the **paragraph 3.1.1.b requires:**

"3| MINIMUM PHYSICAL SITE VISIT REQUIREMENTS

3.1 | Frequency of physical site visits²

3.1.1 | At minimum, the VVB3 shall conduct physical site visit

a. Within two years of project start date⁴; and

b. Once every three years after the first physical site visit"

For the current verification, onsite should have happened before 20th February 2021 as per the rule above 3.1.1.b since the first physical site visit for the first verification was on 20th February 2018.

For the current verification i.e second verification, physical onsite was not possible due to international travel restriction due to COVID situation. Moreover, in India, where the VVB was based there were internal Covid19 restriction which did not allow businesses to function in a proper manner. Therefore, the remote auditing could be conducted only on 16th December 2021.

As per the GS document "Rule Update Covid19 Interim Measures_v6" valid up to 31.12.2022, **we are in the situation of applying the Alternative Measures from paragraph 4.b, allowed by these GS Interim measures**, as follows:

"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

mandatory restrictions put by national/provincial/local government related to COVID-19.

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 the 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 returning from specific countries).

b. If the site visit cannot be postponed due to the 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 is not limited to validation, verification, the inclusion of VPAs, design change review etc.

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):

We consider that this deviation complies with the following GS interim rule:
 "Rule Update Covid19 Interim Measures_v6" valid up to 31.12.2022, paragraph 4.b, Alternative Measures

Therefore, this deviation shall be allowed by GS. Moreover, in the Summary of the document "Rule Update Covid19 Interim Measures_v6", there is the following mentioning:

"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."

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):

There is no impact of this 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 as proved by all project documents uploaded on Sustaincert for the second performance review.

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.)*

N/A

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