

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – dd/mm/yyyy

14/02/2024

1.2 | Decision

The Deviation Request is Not Approved.

VVB (4K Earth Science Private Limited) has conducted remote site visit for the MP 01/07/2018 to 30/06/2020 for the CDM Project verification on 28/04/2021, however the MR has been withdrawn for the monitoring period. The Verification for GS VER has not been conducted or evidenced for the verification conducted, hence the requirements were not conclusive.

VVB (Carbon Check (India) Private Limited) has conducted the physical site visit for the same MP 01/07/2018 to 30/06/2020 on 16/02/2023 and reported in the request below that no specific relevant concerns have been detected by the previous VVB in terms of project design and monitoring implementation. However in the UNFCCC project page, it has been mentioned that there were specific concerns raised by earlier VVB. The issue is unclear as why the VVB has conducted the physical site visit for the same MP which was remotely audited earlier and hence the deviation request is not transparent.

In-line with para 2.2.4 of the Applicability of minimum site-visit requirements by VVB the Project Developer shall ensure that

- a) the duration of the GS monitoring period is not more than three years from the date of site visit by a VVB. For example, if the site visit is concluded on 16/02/2023, the MP cannot start before 15/02/2020 (inclusive).
- b) 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).
- c) Document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

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_588	
Date of decision	14/02/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	12/12/2023	
Project/PoA/VPA	Project	ID – GS5073
	☐ PoA	ID – GSXXXX
	☐ VPA	ID – GSXXXX
Project/PoA/VPA title	JBEL SENDOUQ-KHALLADI (“KHALLADI”) WIND FARM PROJECT IN MOROCCO	
Date of listing	01/01/2018	
GS Standard version applicable	Gold Standard for the Global Goals	
Date of transition to GS4GG (if applicable)	30/06/2020	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not Applicable	
Date of design certification/inclusion (if applicable)	23/05/2019	
Location of project/PoA/VPA	Morocco	
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/899 https://registry.goldstandard.org/projects/details/2053	
Status of the project/PoA/VPA	☐ New ☐ Listed ☒ Certified design ☐ Certified project	
Title/subject of deviation	Waiving off the 3 years Physical site visit requirement	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Consolidated baseline methodology for grid connected electricity generation from renewable sources, ACM0002, Version 6	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/07/2018 End date 30/06/2020	

Submitted by	Contact person name: Anushree Mishra
	Email ID: Anushree.mishra@gmail.com
	Organisation: Numerco Limited
	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: 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):

The following explanation was submitted by Project Developer on 12/12/2022 as part of request for deviation submitted by VVB:

The Project Developer is aware that a requirement pertaining to site visit has already been provided by Gold Standard. The Project developer is also aware that the project exceeded the allowed timeline of 3 years for on-site verification by VVB for the monitoring period 01/07/2018 to 30/06/2020 which is currently under verification.

The primary reason for non-compliance with site visit requirements is Force Majeure which has been contextually defined below:

"Force-Majeure: Any cause constituting force majeure i.e., an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable. Such events may include, but are not limited to;

- any act of war (whether declared or not), invasion, revolution, insurrection, terrorism, or any other acts of a similar nature or force, that prevents VVB travel to project site*
- Natural disaster like flood, earthquake, etc.*
- Change in Governmental requirements, policy, etc that affect the project implementation and operation*
- Any other situation which meets the definition above"*

The last visit for the CDM & GS verification for the project was undertaken by VVB on 26/04/2019. As per the requirement, the site visit was due on 25/04/2022. However, to Covid-19 pandemic across the world, travel had been restricted due to safety concerns.

However, the VVB conducted remote site visit for GS & CDM verification on 28/04/2021 and next physical site visit for the project GS VER verification on 16/02/2023.

In this regard, we are submitting our request to seek your kind consideration for granting an exemption of site visit requirement post three years of last physical site visit for the current monitoring period 01/07/2018 to 30/06/2020 (inclusive of both the dates). This deviation request is based on unavoidable, unforeseen and absolutely grave circumstances created because of the COVID pandemic. Hence, we expect that Gold Standard will appreciate the genuine reasons for this deviation request and would grant an exemption accordingly.

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.*

We Carbon Check (India) Private Limited are aware that a requirement pertaining to site visit has already been provided by Gold Standard; which is

2| REQUIREMENTS

The VVB may approve a deviation to address a non-compliance with the minimum site visit requirement as follows;

2.1 | Validate the reason for gaps in site visit:

2.1.1 | The reasons for non-compliance with site visit requirements could be either Force Majeure or Non-Force Majeure.

a. Force-Majeure: Any cause constituting force majeure i.e., an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable. Such events may include, but are not limited to;

- any act of war (whether declared or not), invasion, revolution, insurrection, terrorism, or any other acts of a similar nature or force, that prevents VVB travel to project site*
 - Natural disaster like flood, earthquake, etc.*
 - Change in Governmental requirements, policy, etc that affect the project implementation and operation*
 - Any other situation which meets the definition above*
- Force majeure does not include shortage of personnel, industrial action, economic downfall, sickness of personnel, and breach of contract by subcontractors and liquidity or solvency problems.*

The last physical visit for the project was done by VVB on 26/04/2019 and the link to the

verification report is given below:

<https://cdm.unfccc.int/UserManagement/FileStorage/QR08OMXCFYI6U5Z1KD42SN3JB P9AWL>

The last physical visit for the project was undertaken by VVB on 26/04/2019. As per the guideline, the site visit was due on 25/04/2022. However, to Covid-19 pandemic across the world, travel was restricted due to safety concerns.

However, the VVB conducted remote site visit for GS & CDM verification on 28/04/2021 and next physical site visit for the project GS VER verification on 16/02/2023.

As per the guideline "2.2.3 | *Follow-up site visits – 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."

Hence, we are applying for deviation for current verification i.e., monitoring period 01/07/2018 to 30/06/2020 (inclusive of both the dates), for this particular project for conducting the physical site visit post three years of last site visit.

Carbon Check (India) Private Limited can confirm that the COVID-19 situation was absolutely grave when the physical site visit for the said project activity was due as per the guideline. Non-essential travel was restricted due to lockdown imposed. However, the VVB conducted remote site visit for GS & CDM verification on 28/04/2021 and next physical site visit for the project GS VER verification on 16/02/2023.

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):

PP has already confirmed that as soon as the travel restrictions were lifted and safety concerns due to travel were alleviated, a thorough on-site visit was conducted by the Verifying VVB on 16/02/2023, which essentially included a detailed personal interview all relevant stakeholders, project site team etc. Essentially, the requirement of undertaking a physical site visit within three years of the last visit could not be adhered to because of the unavoidable, unforeseen and grave situation created by COVID pandemic. However the remote visit was conducted by VVB on 28/04/2021. Due to this, Project developer is seeking an exemption/deviation, which would immensely help in timely delivery of the credits from this monitoring period of the project, as VVB has successfully completed the assessment

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.*

.....

PP has already confirmed that as soon as the travel restrictions were lifted and safety concerns due to travel were alleviated, a thorough on-site visit was conducted by the Verifying VVB on 16/02/2023, which essentially included a detailed personal interview all relevant stakeholders, project site team etc. Essentially, the requirement of undertaking a physical site visit within three years of the last visit could not be adhered to because of the unavoidable, unforeseen and grave situation created by COVID pandemic. Due to this, Project developer is seeking an exemption/deviation, which would immensely help in timely delivery of the credits from this monitoring period of the project, as VVB has successfully completed the assessment.

VVB hereby confirms that:

While the deviation is compliant with the relevant requirement for site visit. Due to Interim Measures for COVID-19, we couldn't perform physical site visit within three years of last on site visit. The VVB confirms that we conducted physical site visit on 16/02/2023. During the physical site visit, VVB conducted personal interview of all relevant stakeholders and a thorough assessment ensuring the quality and the accuracy of the same. Hence, the assessment of the verification was based on best possible capabilities of VVB and hence VVB reconfirms that granting this deviation shall not create any material impact on the project and the outcomes.

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):

Based on the outcome of the verification assessment, PP hereby reconfirms that: There is no impact on the project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. Also, the said monitoring period corresponds to first GS VER verification.

Earlier to this GS VER verification, the project has undergone for first CDM and GS CER verification. Later the PP requested deviation and transitioned the project from GS CER to GS VER 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.*

The VVB is of the opinion that the potential impacts derived from the delay in conducting site visit for this project have already been mitigated by means of the following:

Applying the experience of the VVB in this kind of assessments the pandemic situation has forced us to adapt to;

2. Applying current knowledge of the project itself and the performance of UNFCCC CDM Verification processes done by the VVB for the Monitoring Period from 01/07/2018 to 30/06/2020 (inclusive of both the dates), which also covers the Monitoring Period which is under GS VER verification in GS as well (i.e. 01/07/2018 to 30/06/2020 (inclusive of both the dates). The UNFCCC CDM Verification process has been also conducted by assigned VVB (4k) by remote assessment in 28/04/2021 and no specific relevant concerns have been detected in terms of project design and monitoring implementation.

3. The VVB (Carbon Check (India) Private Limited) conducted physical site visit on 16/02/2023, wherein detailed interviews were conducted as well as VVB personally checked all meters, turbines and also visited sites wherein CSR activities were performed, ensuring all aspects of projects are covered

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.)*

Monitoring Report (final version 3.3 dated 23/10/2023)

Final Verification Report from VVB (final version, 02, 25/07/2023)

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