

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1| Date – 05/11/2022

1.2| Decision

Deviation Request No.1

The requested deviation is **approved**. The PD may proceed with the transition from GS-CER to GS-VER project. However, PD shall ensure the following:

- i. The second crediting period under GS may start from the 01/05/2021 and PD may claim the credits from the start date of the second crediting period considering that all the requirements of the Principles and Requirements are complied with.
- ii. 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).

- iii. PD shall 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-mentioned conditions 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.

Deviation Request No.2:

The requested deviation is **approved**. PP may claim the GS-VERs from 01/07/2018 onwards once the project has transitioned from GS-CER to GS-VER.

PD shall 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-mentioned conditions 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) https://globalgoals.goldstandard.org/standards/501_V2.0_PR_GHG-Emissions-Reductions-Sequestration.pdf

2| Background information

The project design certification was completed on 23/05/2019 as GS-CDM project. The first monitoring period was from 12/12/2017 to 05/06/2018 and GS CERs for the first monitoring period have already claimed. Subsequently the transition to the GS4GG took place in June 2020. The verification of the next monitoring period (2018 onwards) could not happen afterwards due to widespread COVID-19 pandemic and due to uncertainties in the CDM market.

The project crediting period under CDM was valid till 30 April 2021. The 1st crediting period under GS ends in year 2024 as per the approved Transition Annex as well as the approved Monitoring Report of the 1st Monitoring Period. Project Developer request for claiming the monitoring period (01/07/2018 onwards) as GS-VERs and pursue for the renewal of crediting period for the project activity (GS 5073) as GS-VER project.

Deviation Reference Number	DEV_311	
Date of decision	05/11/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	04/10/2022	
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	Renewal of Crediting Period and convert GS-CDM project to GS-VER project
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Deviation is requested as per the 110_V1.2_PAR_Deviation-Approval-requirements-procedures for deviation request "Rule Update-2020-COVID-19_Interim-measures"
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/07/2018 End date
Submitted by	Contact person name: Anushree Mishra
	Email ID: anushree.mishra@numerco.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):

Project Developer request for claiming the current monitoring period (01/07/2018 onwards) as GS-VERs and pursue for the renewal of crediting period for the project activity GS 5073 as GS-VER project activity.

The project design certification was completed on 23/05/2019 as GS-CDM project. The first monitoring period was from 12/12/2017 to 05/06/2018 and GS CERs for the first monitoring period have already claimed. Further the transition of this project from GS ver2.2 to GS4GG was completed on 30/06/2020. The 1st crediting period ends in year 2024 as per the approved Transition Annex as well as the approved Monitoring Report of the 1st Monitoring period. Both the documents are publicly available on the GS registry. However, the PP recently noted that project webpage on the GS4GG registry mentions the end of crediting period as 30/04/2021, which is not inline with the registered GS documents. As the PP was not aware of the change in the end of the crediting period from year 2024 to 2021, hence due to this reason, PP could not apply for the renewal of the crediting period by year 2021.

The CDM crediting period was ended on 30/04/2021, however could not be renewed due to uncertainties related to the CDM market. The verification of the next monitoring period (01/07/2018 onwards) could not happen afterwards due to widespread COVID-19 pandemic. Hence PP requests the following as part of the Deviation Request:

1. **Request No. 1:** PP requests to allow the transition from GS-CDM project to GS-VER project, although CDM crediting period is not renewed. PP is aware of the requirements of the Section 2.1.1 of the "GHG Emission Reduction & Sequestration Product Requirements", which states the following:

"The project or CPA is eligible for transition to GS4GG, if the project or CPA has a valid registration status with the other standard at the time of first submission (preliminary review) to Gold Standard"

However, PP wants to inform that transition to GS4GG already happened on 30/06/2020. The CDM crediting period was ended on 30/04/2021, however could not be renewed due to uncertainties related to the CDM market. Further no action on the renewal of the crediting taken due to COVID-19 pandemic. The "Rule Update-2020-COVID-19_Interim-measures" was valid upto 14/06/2022 which clearly reflects the impact of COVID-19 around the world upto June 2022. Hence the PP requests to allow the transition from GS-CDM project to GS-VER project, even the CDM crediting is not renewed.

2. **Request No. 2:** No action was taken on claiming the credits for the current monitoring period (01/07/2018 onwards) due to the issues of COVID-19 pandemic. Further there are lot of uncertainties related to the CDM market, hence PP do not want to claim GS-CER credits and wish to apply for only GS-VERs credits. Hence PP requests to allow claiming the credits for the period from 01/07/2018 onwards as GS-VERs instead of GS-CERs, as per the Request No. 1 (above).

Hence the PP want to seek deviation as per the above requests (Request No. 1 and Request No. 2) as explained above.

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.*

Not Applicable

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):

With the introduction of the GS4GG in year 2017, the PP already started monitoring the project activity considering the GS4GG requirements. Hence the PP already have the monitoring data as per the GS4GG requirements, since year 2018. Hence applying for the previous monitoring period as on date will not affect any accuracy of emission reductions. PP has sufficient recording procedures and QA/QC procedures that will provide all the necessary data required for claiming the retroactive credits.

Further the COVID-19 had a severe impact on the business of project owner and hence the carbon credits will help the project owner to take forward the project in a sustainable manner.

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.*

Not Applicable

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 above deviation will not cause any impact upon the data quality or attract any potential risk on GS4GG related to any issuance or any other material impact affecting

the quality of the project and thus no any potential risk is attributed to GS Project activity in particular.

The deviation requested adheres to the Principles and Requirements set forth by GS4GG and complies with:

- Environmental Integrity- The GS-CERs/GS-VERs generated from the project activity are not over estimated as a result of deviation and conservativeness are ensured.
- Contribution to Sustainable Development Goals- SDG contributions that the project is designed to achieve are inline with GS4GG requirements and the above deviation does not have any potential impact upon the certified SDG's claimed during the current monitoring period.
- Safeguarding Principles and requirements- The deviation does not create any impact upon the safeguarding principles and requirements set forth by GS4GG.
- Compliance with Host Country Regulations- The project does not create any conflict with Host Country regulations and all the host country regulations are followed.

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.*

Not Applicable

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