

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 18/06/2024

1.2 | Decision

The request is approved.

During the periods in question, there was no Gold Standard (GS) rule mandating site visits at three-year intervals. Therefore, the lack of site visits during these periods did not constitute non-compliance with GS requirements for the past issuances discussed in the request.

The project developer has provided relevant evidence demonstrating that financial constraints and market conditions made it unfeasible to conduct site visits and had submitted monitoring reports in a consecutive manner during the periods from 2016 to 2020.

As soon as the conditions allowed, physical and remote site visits were conducted, with visits occurring on 23/08/2016-24/08/2016, 25/04/2019-26/04/2019, 19/04/2021, and 15/06/2022.

Compliance with Clean Development Mechanism (CDM) requirements was maintained throughout the project. Monitoring reports were submitted to the CDM certification body (UNFCCC) consecutively, and CERs were issued accordingly.

SustainCert shall make note of this decision and proceed forward accordingly.

Note: This request should not be treated as a precedent for other project activities. The scope of this decision is limited to the requested deviation. The project shall demonstrate compliance with applicable rules and requirements as necessary.

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_646	
Date of decision	18/06/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	08/03/2024	
Project/PoA/VPA	Project	ID – GS3434
	☐ PoA	ID – GSXXXX
	☐ VPA	ID – GSXXXX
Project/PoA/VPA title	Uberlandia Landfills I and II	
Date of listing	2015	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	N/A	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	04/09/2019	
Date of design certification/inclusion (if applicable)	04/09/2019	
Location of project/PoA/VPA	Brazil	
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/585	
Status of the project/PoA/VPA	☐ New ☐ Listed ☐ Certified design ☒ Certified project	
Title/subject of deviation	Deviation request for authorization to change the project design after the deadline established in the requirements.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Design Change Requirements, version 1.0 ACM0001: Flaring or use of landfill gas, version 18.1	

Specify the monitoring period for which the request is valid (if applicable)	3 rd MP: Start date 01/01/2016 End date 03/09/2019 4 th MP: Start date 04/09/2019 End date 02/03/2020 5 th MP: Start date 03/03/2020 End date 31/12/2020
Submitted by	Contact person name: João Sprovieri Email ID: joao.sprovieri@beng.eng.br Organisation: Beng 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: Earthood Services Private Limited VVB Staff name(s): Sergio Cruz – Team leader
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☒ No ☐ Decision date: 13/05/2022

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):

Due to a finding raised by SustainCert during the Performance Review no. 3, Round 1 and 2, the issue below was raised:

COMMENT/REQUEST number: 15

Round 1: The VVB shall clarify:

- b) how the monitoring site visit frequency of at least once in 3 years as per the GS rules was met.
- c) how the VVB conducted the verification 5 years later for vintage 2016 onwards.

This issue refers to the Validation and Verification Standard (version 1.0), paragraph 9.3.4, where it is mandatory to conduct an on-site inspection at verification for the design certified project activity if:

- a. It is the first verification for the VVB with regard to this project activity;*
- b. More than three years have elapsed since the last on-site inspection conducted for verification for the project activity.*

And also refers to the Validation and Verification Standard (version 1.0), paragraph 9.4.2, where it shall be confirm that:

- 1. Monitoring periods have been consecutive.*
- 2. Monitoring reports have been submitted to the certification body in a consecutive manner, that is, when a monitoring report is being submitted for a monitoring period, the VVB shall confirm that monitoring reports for the previous monitoring periods have been published.*

Regarding the project activity onsite visits, please see below the timeline of visits:

- 23 and 24/08/2016 - PHYSICAL SITE VISIT – GS VERIFICATION MP #1
10/07/2013 – 31/12/2015;
- 25 and 26/04/2019 – PHYSICAL SITE VISIT – CDM and GS VALIDATION OF RENEWAL OF CREDITING PERIOD;
- 19/04/2021 – REMOTE VISIT due to COVID-19 restrictions – CDM and GS VERIFICATION MP # 4 03/03/2020 – 31/12/2020;

Regarding the project activity Monitoring Periods (MP), please see below the timeline of actions:

- MP #1: 10/07/2013 – 31/12/2015 ; Issued GS VERs on 20/08/2021
- MP #2: 01/01/2021 to 31/12/2022 ; Issued on GS VERs on 15/11/2023
- MP #3: 01/01/2016 – 03/09/2019 ; Issued in CDM. Not issued in GS yet, currently under Performance Review

- MP #4: 04/09/2019 – 02/03/2020 ; Issued in CDM. Not issued in GS yet, currently under Performance Review
- MP #5: 03/03/2020 – 31/12/2020 ; Issued in CDM. Not issued in GS yet, currently under Performance Review

Discussion under the Comment Request number: 15 b) and c) raised:

1.b) The 3-year interval monitoring site visit frequency was not accomplished at MP #3, #4 and MP #5 verifications since the project is a CDM-GS project activity and ERs were firstly issued in CDM. As per CDM rules, there is no such requirement for monitoring frequency, and the verification was concluded and CERs issued. There was no market conditions between 2016 and 2020 in order to make feasible investments for GS Performance Review and the PP was committed with all costs charged by the CDM and could not unfortunately open the due Performances Reviews #3, #4 and MP #5. However, it is identified a physical site visit in April 2019 for the means of Renewal of CP. In this sense, this document aims to request permission to proceed with the issuance of the carbon credits between monitored period 2016 and 2020, MP #3, #4 and MP #5 even though the minimum routine of physical site visits was not met.

1.c) As explained above, the project was a CDM-GS project activity and as the CDM verification was performed with such an interval without any negative impacts, with the conclusion of the verification and issuance of respective CERs. Also, Monitoring Reports were submitted to the CDM certification body, UNFCCC in a consecutive manner.

Email from PP to SustainCert (From r.oliveira@asja.energy to annyta.luo@sustain-cert.com) was sent on 09/07/2023, Subject: RES: Re:[## 16723 ##] Query on SustainCERT GS3434, stating the below:

"Dear Annyta,

The documentation forwarded within Performance Review No. 3 refers to the 5th verification of the Uberlândia Landfills I and II project, that is, the 3rd verification of the 2nd crediting period. As we are finalizing the audit with the VVB of three other verifications and following the understanding of the observation presented by you. The checks should proceed as follows:

- *Performance Review No 2: 01/01/2016 to 03/09/2019 – Issued by the UNFCCC and we will convert to GS CERs.*
- *Performance Review No 3: 04/09/2019 to 02/03/2020 – Issued by the UNFCCC and we will convert to GS CERs.*
- *Performance Review No 4: 03/03/2020 to 31/12/2020 – Issued by the UNFCCC and we will convert to GS CERs.*
- *Performance Review No 5: 01/01/2021 to 31/12/2022 – Refers to the verification that is submitted within Performance Review No 3.*

In order to fix it, we need your help to create the other Performance Review. The Performance Review MRs (No. 2, No. 3 and No. 4) as indicated above, are already under review with the VVB and should be submitted by the end of August.

Due to the issuance deadlines, signed in the contract, of the GS VERs for the period 01/01/2021 to 31/12/2022, it was necessary to submit it, before sending the Performance Review MRs (No. 2, No. 3 and No. 4) which are indicated above.”

In the same direction of response b) above, between 2016 and 2020 there was no market conditions to make feasible investments for GS Performance Review and Monitoring reports have not been submitted to the certification body in a consecutive manner. In this sense, this document aims to request permission to proceed with the issuance of the carbon credits between monitored period 2016 and 2020, MP #3, #4 and #5 even though the Monitoring reports have not been submitted to the certification body in a consecutive manner.

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

- b) in fact, the requirements for the monitoring site visit frequency of at least once in 3 years as per the GS rules was not met. Nevertheless, there were visits on 23 and 24/08/2016 (physical); 25 and 26/04/2019 (physical); 19/04/2021 (remote); and 15/06/2022 (physical). All inspections attested the compliance of the project activity and its monitoring plan to the description of registered PDD. No major discrepancy was verified in any of those visits. Moreover, it can be confirmed that there is no negative impact to the accuracy, conservativeness and completeness of the project activity, neither for the application of methodology and tools.
- c) in fact, the verification of MP from 01/01/2016 to 03/09/2019 has happened by a remote site visit 19/04/2021, which is more than 5 years from the beginning of the MP, but 1 ½ year from the end of the period. As explained by the project owner, the market scenario did not allow a visit before that. It is important to

mention that a physical site visit was performed on 15/06/2022 to reconfirm all information. In addition, although the issuance of VERs of MP from 01/01/2021 to 31/12/2022 has already happened, the chronology of the verifications has been verified as the three previous MPs (i.e., 01/01/2016 – 03/09/2019; 04/09/2019 – 02/03/2020; and MP #4: 03/03/2020 – 31/12/2020) had their MRs already published at CDM website, with audit processes finalized and CDM CERs already issued. The verification team can confirm that there is no negative impact of accuracy, conservativeness and completeness of the project activity, neither for the application of methodology and tools.

Therefore, the verification team understands that the required deviations have no negative impact to the operation of the project activity and conservativeness of ER calculations, with no negative impact to the accuracy and completeness of the project activity and to the application of methodology and tools.

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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):

The deviation aims at requesting permission to proceed with the issuance of the carbon credits between monitored period 2016 and 2020 (MP#3, MP#4 and MP#5), even though the minimum routine of verification physical site visits has not been met and Monitoring reports have not been submitted to the certification body in a consecutive manner. It is needed since the PP suffered with lack of market feasibility to perform the site visits and submission of monitoring periods mentioned in line with GS rules and wishes to recover the full monitored periods of the GS4GG project.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

As explained in 3.1.2 above, as per the VVB's opinion, four visits (physical or remote) have been performed within the monitoring periods mentioned above and it is possible to confirm that the deviations have no negative impact to the operation of the project activity and conservativeness of ER calculations, with no negative impact to the accuracy and completeness of the project activity and to the application of methodology and tools.

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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):

The deviation is related to rules specified in Validation and Verification Standard (version 1.0), paragraph 9.3.4, where it is mandatory to conduct an on-site inspection at verification at a maximum of 3-years interval.

And also refers to the Validation and Verification Standard (version 1.0), paragraph 9.4.2, where Monitoring reports should be submitted to the certification body in a consecutive manner.

Thus, there is an impact on Emissions Reductions since the deviation aims requesting permission to proceed with the issuance of the carbon credits between monitored period 2016 and 2020 (MP#3, MP#4 and MP#5) and wishes to recover the full monitored periods of the GS4GG project.

The Deviation requested does not impact items below:

- Project Design
- Safeguarding principles assessment
- SDG assessment
- Monitoring frequency
- Data quality

- Potential risk or any other relevant aspect of the project.

3.3.2 | VVB opinion (to be completed by VVB, if applicable):

As explained in 3.1.2 above, as per the VVB's opinion, all visits could confirm the compliance of the project activity and its monitoring plan to the description of registered PDD. No major discrepancy was verified in any of those visits. The gathering of monitored data was not changed and continue being collected in a transparent, accurate and conservative manner. So, it can be confirmed that there is no negative impact to the accuracy, conservativeness and completeness for the project activity, neither for the application of methodology and tools.

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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.)*

PREVIOUS APPROVED DEVIATION: COVID DEV_225.pdf

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