

03. DEVIATIONS: WHY AND WHEN ARE THEY REQUIRED

DEVIATION APPROVAL REQUIREMENTS AND PROCEDURES

Publication: 3rd May, 2022 (v1.2)

- Provides guidance on temporary changes and permanent changes to projects
- Deviations are changes which have been necessitated by the project
- Deviations happen when project deviates or is at risk of deviating from:
 - Applicable requirements listed in the GS4GG documents
 - Requirements listed in an applicable SDG Impact Quantification methodology
 - Its approved monitoring plan

Difference Between Deviations and Design Change

- Deviations are a temporary changes from the approved plan, GS requirement or methodology requirements
- Design change are permanent changes to the registered GS project which the PD requests to be considered and be approved.

What to do if a project deviates or is likely to deviate from GS requirements?

As a rule of thumb, seek GS approval:

- Before commencement of monitoring or verification exercise
- Inform VVB about the deviation and deliberate on the nature of the deviation being sought
- Determine with VVB's input whether the verification shall be re-scheduled after GS decision regarding the submitted deviation request or not
- If verification proceeds, do not submit to GS seeking performance review without deviation approval outcome
- VVB shall not finalise verification report without deviation approval outcome unless the deviations are those which do not require GS approval.

Deviation Challenges

- Most PDs deviate from monitoring requirements due to circumstances beyond their control
- PD fails to seek GS approval in term before verification conclusion
- Deviations sent to GS can be a) approved, b) approved with conditions and c) rejected
- If b) and c), PD can have challenges if verification is carried out before approval is given
- In a worst-case scenario, the verification is repeated

Examples of cases where PD fails to seek deviation request approval

- PD fails to submit project for validation within 6 months after the time of first submission for Preliminary Review and but continue to apply old version of applied methodology (GHG Standard par. 8.2.2)
- Project fails to complete Validation within two years of successful listing of the project. (P&R para. 5.1.1 (b) and 5.1.16)
- VVB fails to conduct physical site visit within two years of project start date and once within every three years after the first physical site visit date (Site Visit and Remote Audit Par 3.1.1 and 3.1.2)

Examples of cases where PD fails to seek deviation request approvalCont

- PD fails to submit project for listing within 1 year from project start date (Preliminary review requirements Par 2.1.2)
- PD fails to implement project in line with registered monitoring plan (P&R par. 2.2.1 (a))
- Design change request not submitted within one year of the start date of the proposed technology/measures (Validation Verification Body Requirements par. 4.8.3 (c))
- VVB fails to rotate the team used during validation and verification when they validate and verify the same project (Validation Verification Body Requirements par. 6.8.1)