

FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: 12/11/2024

VERSION: 6.0

NEXT PLANNED UPDATE: 12/11/2026

RELATED DOCUMENTS

– [Deviations Approval Requirements and Procedures](#)

CONTACT DETAILS

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1| General Guidelines

1.1 | Applicability

- 1.1.1 | This form is to be completed for projects (project activities/PoAs/VPAs) seeking deviation or is/are at a risk of deviating from any [applicable requirements](#), GS4GG-specific requirements listed in the applicable [Methodologies](#) or any other deviations occurring in any of the various aspects of the project.
- 1.1.2 | Refer to the latest version of [Deviation Request Requirements and Procedures](#) for detailed information on the procedures and requirements.
- 1.1.3 | This form can be used in the following instances i.e.,
 - a. Deviation from GS4GG requirements and/or applicable methodologies prior to submission for certification with GS4GG.
 - b. Temporary changes to a certified project - which include changes from the registered monitoring plan, the applied methodologies or other standard documents - that are expected **not** to occur beyond a given monitoring period.
- 1.1.4 | For any permanent changes to a design certified project, the requirements set in [Design Change Approval Requirements and Procedures](#) shall be followed.

2| Submission of deviation form

- 2.1.1 | This form shall be submitted in Microsoft Word (.doc) format to Gold Standard at deviations@goldstandard.org
- 2.1.2 | Forms with incomplete/inaccurate information shall not be considered for review and shall be returned to the applicant.

3| Implementation of deviation decision

- 3.1.1 | The decision prescribed in this form shall be considered by the entity applying for deviation for further course of action.

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4| Decision summary

To be completed by Gold Standard

4.1 | General information

| | |
|----------------------------|--|
| DEVIATION REFERENCE NUMBER | DEVRQ-144 |
| Date of decision | 07/11/2025 |
| Decision | <input type="checkbox"/> Approved [No precondition to apply the deviation decision] <input type="checkbox"/> Conditionally approved [Decision is subject to compliance with the precondition defined below] <input checked="" type="checkbox"/> Not approved [reason for rejection is provided in decision summary] |

4.2 | Decision

4.2.1 | Decision Summary

The deviation request is not approved as the project developer could not demonstrate with evidence the real and continuous consideration of carbon finance while the project was not submitted for Preliminary Review within one year of the project start date.

The list of submitted evidences were reviewed:

- *GS12229 Timeline of Project Implementation.docx*
- *407.4_V1.2_TPDDTEC_ER-Tool ICS-Odisha-IND (Banhi).xlsx*
- *407.4_V1.2_TPDDTEC_ER-Tool ICS-Odisha-IND (Pratamesh-1).xlsx*
- *Sbp 8.jpeg*
- *Sbp 10.jpeg*
- *Sbp 11.jpeg*
- *Sbp 18.jpeg*
- *Sbp 19.jpeg*
- *Sbp 34.jpeg*
- *Sbp 37.jpeg*
- *Sbp Handwritten-5.jpeg*
- *Sbp1.jpeg*
- *Sbp2.jpeg*
- *Sbp-3.jpeg*
- *Sbp4.jpeg*
- *6 Study claims overcrediting in ICS projects.png*
- *7 MP92_Annex 7_Information Note_fNRB values.pdf*
- *8 myclimate comment to UNFCCC EB.pdf*
- *9 Odisha fNRB by Mofuss.png*
- *10 Preliminary Review request to SustainCert.pdf*
- *11 Stakeholder-Consultation-Report 2nd 3rd ICS_Odisha_IND CONFIDENTIAL.pdf*

- 12 - GS advice to submit Deviation Request.pdf

4.2.2 | Directions for the project developer/CME, if applicable

N/A

4.2.3 | Directions for the Validation and Verification Body (VVB), if applicable

N/A

4.2.4 | Directions for the Gold Standard, if applicable

N/A

4.3 | Applicability to other activities

| | |
|---|--|
| Is this decision applicable to other projects under similar circumstances? ¹ | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Does this decision set a precedent for future projects with similar circumstances? ² | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Precedent details (if applicable to other activities) | |
| NA | |

¹ If this is marked yes, this means that any other project (PoA/VPA/PA) in similar situation may apply the decision of this deviation to their project as well. The project developer/VVB may quote this deviation decision in the relevant certification documents. This is relevant to only the projects which have already entered the certification cycle with GS4GG.

² If this is marked yes, it means the decision is valid to all the future projects which will enter the certification cycle with the similar situation. This is relevant to all the projects which are not yet design certified with GS4GG or have not submitted their documents for preliminary review yet.

5| Deviation Request Details

To be completed by the entity requesting deviation - (Project Developer/Coordinating and Managing Entity and/or VVB)

5.1 | Submitted by

- ☒ Project developer
☐ CME
☐ VVB
☐ Other (specify...)

5.2 | Details of the entity and its representative submitting the form

| Item | Information |
|--|--|
| Name ³ : | Rex Romero |
| Email ID ⁴ : | rex.romero@myclimate.org |
| Organisation: ⁵ : | Foundation myclimate |
| Are you an authorized project participant as per the cover letter submitted for this activity? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

5.3 | Background information

| | | | |
|--|--|---|--|
| Type | <input checked="" type="checkbox"/> Project activity | <input type="checkbox"/> PoA GSXXXX | <input type="checkbox"/> VPA |
| GS ID | GS 12229 | GS XXXX GS XXXX | GS XXXX GS XXXX |
| Host country(ies) | India | | |
| Project Title | Utkal Uday Improved Cookstove Project, India | | |
| Registry link | SustainCERT Platform | | |
| Scale | <input type="checkbox"/> Microscale (GS) <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale <input type="checkbox"/> Other, if applicable please specify below <i>Insert text here</i> | | |
| Certification Status and corresponding date of latest status | <input type="checkbox"/> Listed | <input type="checkbox"/> Certified design | <input type="checkbox"/> Certified project <input checked="" type="checkbox"/> Other <i>Preliminary Review no.1 In Preparation</i> |

³ Name of the individual representing the entity requesting the deviation

⁴ Email ID for further correspondence related to the deviation request

⁵ The name of the entity requesting the deviation

| | | | | |
|---------------------------------|---|---|------------------------------|------------------------------|
| | dd/mm/yyyy | dd/mm/yyyy | dd/mm/yyyy | 14/04/2025 |
| Applied version of Standard | <input checked="" type="checkbox"/> GS4GG | | | |
| | <input type="checkbox"/> Previous version of Gold Standard | Version no. | | |
| | | <input type="checkbox"/> 1.0 | <input type="checkbox"/> 1.1 | <input type="checkbox"/> 1.2 |
| Transition date, if applicable | From previous GS version to GS4GG | | dd/mm/yyyy | |
| | From another standard to GS4GG | | dd/mm/yyyy | |
| | Name of another standard | <input type="checkbox"/> CDM | | |
| | | <input type="checkbox"/> Other Name of the Standard – Insert text here | | |
| Applicable activity requirement | <input type="checkbox"/> Renewable Energy Activity Requirements <input checked="" type="checkbox"/> Community Services Activity Requirements <input type="checkbox"/> Land-use and Forests Activity Requirements <input type="checkbox"/> Other <i>Insert name here</i> | | | |

5.4 | Project deviation history

| | | | |
|--|--|-----------------------------------|--|
| Is there any deviation request(s) for the same project activity/PoA/VPA(s) that was submitted to GS previously? If yes, below information. | | | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Reference number | n/a | | |
| Status of the deviation | <input type="checkbox"/> Approved | <input type="checkbox"/> Rejected | <input type="checkbox"/> Under review |
| Were there any findings (CL, CAR, FAR) raised during any certification step (preliminary review, design and/or performance review etc.) that are relevant to this deviation request? | <input type="checkbox"/> Yes <input type="checkbox"/> No Summary of the findings <i>Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number</i> | | |

6 | Deviation detail

To be completed by the entity requesting deviation (Project Developer/Coordinating and Managing Entity and/or VVB)

6.1 | Standard document reference

| | | |
|-----------------------------|-----------|-----------------------------|
| Standard document reference | Title | Principles and Requirements |
| | Version | V2.1 |
| | Paragraph | para 4.1.49 |

6.2 | Description of the deviation

| | | |
|-------|------------------------------------|---|
| Title | Adjust crediting period start date | |
| | <input type="checkbox"/> Temporary | <input checked="" type="checkbox"/> Permanent |

| | | |
|--|--|--|
| Confirm the nature of changes related to deviation | (e.g. not expected to occur beyond one monitoring period) | (e.g. deviation from requirements prior to submission for certification) |
| | Insert Text here (if required) to support the selection | |
| Relevant monitoring period, if applicable | Start date | 01/01/2023 |
| | End date | 14/10/2024 |
| Summarise the changes | <p>Deviation Request for Prior Consideration Requirement (Section 4.1.49)</p> <p>We respectfully request an exception to the Gold Standard requirement outlined in Section 4.1.49 of the Principles and Requirements, which mandates the submission of required documents for Preliminary Review within one year of the project start date for both regular and retroactive projects.</p> <p>The project was originally intended to be submitted as a Regular project. A formal Local Stakeholder Consultation (LSC) was held on 29 November 2022, and Gold Standard was notified of this one month in advance, which aligns with standard procedures for a Regular project submission. However, due to unforeseen delays in documentation and finalization, the submission could not be completed within the one-year window. We kindly request that the deviation be granted, allowing for the submission of the required documents after the one-year deadline, in recognition of the intention to comply with Gold Standard procedures from the outset.</p> <p>We appreciate your consideration of this request and are happy to provide any additional information as needed.</p> | |
| Reason for deviation | <p>The request for deviation arises due to significant delays in project implementation and unforeseen challenges encountered during the stove deployment process.</p> <p>1. Deployment Delays and Community Confusion</p> <p>The project implementer, Meensou, faced a delay in the distribution of the first batch of stoves. Initially, 50 stoves (out of the intended 40,000) were distributed in January 2023. However, upon reaching the target communities, Meensou discovered that these communities had already been engaged by a different stove project, which had promised stoves and collected national IDs from residents. As the communities had been waiting for stoves for a long time, they demanded stoves from Meensou. To maintain the integrity of the carbon project and avoid double-claiming from the same households, Meensou had to negotiate and clarify that they were a separate entity. This issue caused significant delays as Meensou had to identify alternative communities that had not been promised stoves by another project.</p> <p>2. Impact of the fNRB Study</p> <p>During this time, the release of the Berkeley study on fNRB raised new concerns regarding the project's carbon credit projections and</p> | |

| | <p>demand for such credits. Given the uncertainty around the study's findings, Meensou chose to wait for guidance on fNRB values, which caused further delays in finalizing the certification process.</p> <p>3. Transition to Retroactive Submission</p> <p>Following delays in the deployment and the fNRB uncertainty, Meensou decided to proceed with certification using the best available information, despite the time lapse since the formal LSC meeting (29 Nov 2022). Unfortunately, on 13 Dec 2024, SustainCert rejected the Preliminary Review submission, prompting a shift towards retroactive certification. Formal LSC meetings were held on 12 and 20 January 2025, and the LSC Reports were submitted for Gold Standard Assurance's Preliminary Review on 25 March 2025, following guidance from Gold Standard.</p> <p>This deviation request is submitted based on Gold Standard's advice, acknowledging the exceptional circumstances leading to the delay.</p> | | | | |
|--|---|---|--|------------------------|------------------------|
| Proposed resolution | <p>The project participant proposes to submit the project as a Retroactive Project with a Designated Project Start Date of 14 October 2023. This date reflects is one year from the submission date to SustainCERT.</p> <p>Despite the delays, the project has adhered to the Gold Standard guidelines throughout the entire period, with proper documentation and monitoring maintained from the outset. All activities, including stove distribution and community engagement, have been tracked and recorded in compliance with the Gold Standard's monitoring and reporting requirements.</p> | | | | |
| Is there any potential temporary or permanent impact of deviation on other aspects of the project? | <p>Select the relevant area:</p> <p><input type="checkbox"/> Project design</p> <p><input type="checkbox"/> Local stakeholder consultation</p> <p><input type="checkbox"/> Safeguarding principles</p> <p><input type="checkbox"/> SDG assessment</p> <p><input type="checkbox"/> Regulatory compliance</p> <p><input type="checkbox"/> Additionality</p> <p><input type="checkbox"/> Applicability of methodology</p> <p><input type="checkbox"/> Annual emission reduction volume (<i>if yes, fill the table below</i>)</p> <table border="1"> <thead> <tr> <th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/removal after applying deviation</th></tr> </thead> <tbody> <tr> <td>XYZ tCO₂e</td><td>XYZ tCO₂e</td></tr> </tbody> </table> <p><input type="checkbox"/> any other matrix, please specify...</p> | Annual emission reduction/removal before applying deviation | Annual emission reduction/removal after applying deviation | XYZ tCO ₂ e | XYZ tCO ₂ e |
| Annual emission reduction/removal before applying deviation | Annual emission reduction/removal after applying deviation | | | | |
| XYZ tCO ₂ e | XYZ tCO ₂ e | | | | |
| Summary of the impact | Describe the impact of the deviation on each relevant aspect of the project as selected above. Please substantiate the impact assessment with relevant and verifiable data/information. | | | | |
| Insert text here | | | | | |

6.3 | VVB information

| | |
|--|--|
| Is a VVB opinion on the deviation request required? <i>VVB opinion shall be included, where required by the requirements under Deviations Request Requirements and Procedures or request is submitted by the VVB.</i> | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <i>If answer is yes, fill the information in section 6.4 below.</i> |
|--|--|

6.4 | VVB's assessment

The below information is to be completed by VVB, if applicable.

| | | |
|---|---|--|
| VVB's assessment of deviation request | Please confirm the nature of deviation. | |
| VVB's assessment of impact of deviation request | | |
| VVB recommendation | | |
| VVB details | VVB name: | |
| | Auditor name(s): | |
| | Email (s): | |

6.5 | Documents:

6.5.1 | List of documents provided (*note that once a decision has been made by Gold Standard, this deviation form will be made public on the Gold Standard website. Kindly refrain from including any confidential information in the form.*)

Document 1.

Document 2.

Document n.

DOCUMENT HISTORY

| VERSION NUMBER | RELEASE DATE | DESCRIPTION |
|-------------------|--------------|--|
| 6.0 | 12.11.2024 | Editorial and structural changes to the template |
| 5.0 | 11.04.2022 | Additional information added: <ul style="list-style-type: none"> - 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 |
| 4.0 | 14.01.2021 | Editorial changes |
| 3.0 | 16.07.2020 | Editorial changes |
| 2.0 | 03.05.2018 | Editorial changes |
| 1.0 | 01.07.2017 | Initial adoption |