

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	Revised decision – 21/05/2026 Initial decision – 07/11/2025
Decision	☐ Approved [No precondition to apply the deviation decision] ☒ Conditionally approved [Decision is subject to compliance with the precondition defined below] ☐ Not approved [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

Revised decision

The requested deviation is conditionally approved.

1. Eligibility of Distributed Stoves: The Project Developer (PD) shall not include any cookstoves in the project design or database that were distributed prior to 25th March 2024. This date represents the limit for the retroactive start date based on the valid Preliminary Review submission.
2. Stakeholder Consultation Feedback: The Project Design Document (PDD) must clearly demonstrate that any relevant feedback received during the new stakeholder consultation rounds, conducted on 12th and 20th January 2025, has been meaningfully incorporated into the project design (where applicable).
3. Site Visit and Verification Requirements: Standard site visit requirements remain applicable. Accordingly, the Validation and Verification Body (VVB) cannot verify a duration exceeding two (2) years from the actual site visit date.

Initial decision:

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

NA

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

NA

4.2.4 | Directions for the Gold Standard, if applicable

NA

4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances? ¹	☐ Yes ☒ No
Does this decision set a precedent for future projects with similar circumstances? ²	☐ Yes ☒ 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?	☒ Yes ☐ No

5.3 | Background information

Type	☒ Project activity	☐ PoA GSXXXX	☐ VPA
GS ID	GS12229	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	India		
Project Title	Utkal Uday Improved Cookstove Project Odisha, India		
Registry link	N/A		
Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below Insert text here		
Certification Status and corresponding date of latest status	☐ Listed dd/mm/yyyy	☐ Certified design dd/mm/yyyy	☐ Certified project dd/mm/yyyy
			☒ Other Preliminary Review 14/10/2024

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

Applied version of Standard	☒ GS4GG			
	☐ Previous version of Gold Standard	Version no.		
		☐ 1.0	☐ 1.1	☐ 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	☐ CDM ☐ Other Name of the Standard – Insert text here		
Applicable activity requirement	☐ Renewable Energy Activity Requirements ☒ Community Services Activity Requirements ☐ Land-use and Forests Activity Requirements ☐ 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.			☒ Yes ☐ No
Reference number	DEVREQ-144 [#61022]		
Status of the deviation	☐ Approved	☒ Rejected	☐ 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?	☐ Yes ☒ No		
	Summary of the findings Section 4.2.1 (page 4): 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.		

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	Version V2.1
	Paragraph	para 4.1.40

6.2 | Description of the deviation

Title	Request to exclude from ER crediting all cookstoves distributed before 15/10/2023.	
Confirm the nature of changes related to deviation	☐ Temporary not expected to occur beyond one monitoring period	☒ Permanent deviation from requirements prior to submission for certification
	Insert Text here (if required) to support the selection	
Relevant monitoring period, if applicable	Start date	14/10/2023
	End date	13/10/2028
Summarise the changes	For the purpose of this Gold Standard project, the official Project Start Date is 14 October 2023. Limited cookstove distributions commenced before the defined project start date. However, section 4.1.40 (Project Start Date) of 101_V2.0_PAR_Principles-Requirements states, "For distributed technology projects, the start date is the date of implementation of the first unit under the project." Therefore, activities before 14 October 2023 will be considered pre-project, and excluded from crediting. This date aligns with the first submission to SustainCERT Preliminary Review on 14 October 2024. There were subsequent requests to Gold Standard for Preliminary Review then Deviation in March then April 2025, respectively. These are, in retrospect, misapplication of the guidance. This current request for Reconsideration's change is the appropriate corrective measure to the October 2024 submission.	
Reason for deviation	Project implementer Meensou distributed some stoves before 15 October 2023 (Document 1). The distribution struggled at first because a different operator co-opted Meensou's intended project areas. Meensou wanted to ensure accounting integrity of its project, so it constrained its distribution activities. distribution was delayed and only resumed gradually once the risk of overlap could be managed (Document 2). From February 2023 to June 2024, drastic changes in the fNRB guidelines also exerted downward pressure on the project's ER and financial projections (Documents 3 to 7). Project documentation was revised to suit the new guidelines once those were finalized, and the project was submitted 14 October 2024. SustainCERT rejected this first request. Reasons cited were that project start date defined more than one year before submission, and that LSC report submitted more than three months after the event (Document 9). As argued in DEVRQ-144 (this time submitted to GoldStandard as SustainCERT had ceased assurance services), the project participants' response was to organize a new conforming LSC meeting as soon as possible and made Deviation Request to shift the crediting	

	period to one year before submission (Documents 10 & 11). This project participant has since been seeking an audience with Gold Standard, and is filing this Reconsideration request on Gold Standards' last communication on January 2026 (Document 12). We feel a direct conversation would resolve this issue faster, but hope this new submission is presented to your satisfaction. Upon further analysis, DEVRQ-144 failed to address the 4.1.49 (b) of 01_V2.0_PAR_Principles-Requirements: "Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date."				
Proposed resolution	For the purpose of GS1229, the official Project Start Date is 14 October 2023, aligned with the first submission for Preliminary Review on 14 October 2024. The proposed resolution complies with 4.1.49 (b) of 01_V2.0_PAR_Principles-Requirements. Meanwhile, all cookstoves distributed prior to 15 October 2023 are treated as pre-project activity and are explicitly excluded from the credited project population and all emission reduction calculations. 4.1.40 (Project Start Date) of 101_V2.0_PAR_Principles-Requirements states, "For distributed technology projects, the start date is the date of implementation of the first unit under the project," applies for distribution from 14 October 2023 onwards. Accuracy is ensured by applying the Project Start Date cut-off directly in the monitoring database and ER Tool, using verifiable distribution records (e.g., delivery notes, household acceptance forms, digital logs) to include only units distributed on/after 15 October 2023. Completeness is ensured by transparently documenting pre-start distributions in the project description as context, while clearly separating them from the credited population. Conservativeness is ensured by not claiming any emission reductions from pre-start distributions and by preventing any risk of double counting (Document 13).				
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	Select the relevant area: ☒ Project design ☐ Local stakeholder consultation ☐ Safeguarding principles ☐ SDG assessment ☐ Regulatory compliance ☐ Additionality ☐ Applicability of methodology ☐ Annual emission reduction volume <i>(if yes, fill the table below)</i> <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></td><td></td></tr> </tbody> </table>	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				

	XYZ tCO ₂ e	XYZ tCO ₂ e
	☐ any other matrix, please specify...	
Summary of the impact	The Reconsideration of the Deviation Request defines Project Start Date as 14 October 2023. This ensures the project meets Gold Standard retroactive eligibility requirements. All distributions are documented for transparency but pre-Start Date activities are excluded from crediting to prevent any double counting. Otherwise, there are no further impacts on the project design identified. The purpose and general description of the project stays the same; the general location stays the same; the technology stays the same; the scale is same; funding source source is still sales of potential carbon credits. Deviation has no further impact on the local stakeholder consultation, Safeguarding principles, SDG assessment, regulatory compliance, additionality, methodology applicability nor ER volume. The project monitoring, grievance mechanism, trainings, and other project activities are all in place by the defined project start. These activities have all been documented and able to be audited by a VVB after project Registration.	
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 ☐ No ☒ <i>If answer is yes, fill the information in section 6.4 below.</i>
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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. Distribution schedule of Meensou stove model Prathamesh-1

Document 2. Affidavit from project owner regarding constraint on distribution.

Signed statements from individual households available on request.

Document 3. Berkeley study asserts over-crediting from cookstove methodologies

Document 4. Ex-ante calculations using old fNRB indicating up to 101,000 ERs/y

Document 5. UNFCCC publishes drastically lower fNRB of 10-30% for project area

Document 6. myclimate comments to UNFCCC EB regarding risk to project viability

Document 7. Ex-ante calculations using new fNRB indicating up to 35,000 ERs/y

Document 8. Regular communication between Meensou and myclimate

Document 9. Rejection by SustainCERT

Document 10. DEVRQ-144

Document 11. DEVRQ-144 accompanying email

Document 12. GS email advising Request for Reconsideration

Document 13. Around 2,800 tCO₂/y will be excluded from being claimed as ERs

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: - 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