

FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: 12/11/2024

VERSION: 6.0

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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	DEVQR-172
Date of decision	28/04/2026
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

A conditional deviation from Annex 1 of the [Soil Organic Carbon Framework Methodology](#) (SOC FM) is allowed. This exception applies to only one project submitted by the Project Developer for design certification, where SOC FM is applied.

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

The Project Developer may utilize a customized stratification-based sampling approach provided it employs a standardized, reproducible stratification protocol and probability-based random sampling within each stratum. For the purposes of this decision, a reproducible stratification protocol is one where a third party, using the same data layers (e.g., soil texture, slope, and land use/management), would arrive at the same stratum boundaries. Probability-based random sampling requires that every location within a stratum has a known, non-zero chance of selection, strictly prohibiting the use of representative or convenience site selection.

In addition, the following conditions shall be adhered to:

- a) Stratification must be established *a priori*.
- b) Remain fixed for the crediting period and re-checked at renewal of crediting period (if applicable).
- c) Incorporate at minimum: i) soil texture, ii) slope (where gradients exceed 5%), and iii) land use or management history. Other parameters to consider for stratification include drainage class/hydrology, multi-year vegetative productivity indices (e.g., mean NDVI), and previous organic amendment history (e.g., compost or manure applications).
- d) Regardless of the statistical calculation, no stratum shall have fewer than 5 primary samples to ensure a baseline level of distribution for variance analysis.
- e) To ensure standardization, the approach must achieve a precision of 90% confidence with a +/- 10% error margin. Failure to meet this target necessitates a reliability deduction, applying the lower bound of the 90%

confidence interval to project outcomes and the upper bound to baseline stocks to maintain conservativeness.

- f) If the Coefficient of Variation (CV) within a stratum exceeds 10%, the developer shall increase the sample size appropriately to attempt to meet the required precision target and avoid deductions. Furthermore, any stratum displaying a CV exceeding 50% is considered under-stratified and must be subdivided to accurately reflect soil heterogeneity and reduce intra-stratum variance.
- g) Soil sample collection, testing and SOC estimation shall follow the extant requirements of Annex 1 of SOC FM.
- h) This exception applies exclusively to one project submitted by the Project Developer for design certification where SOC FM is applied. Following the conclusion of this design certification process, the Project Developer may apply for similar deviations for subsequent projects applying SOC FM. Any such requests must be accompanied by relevant findings and stakeholder input obtained during the initial design validation stage to ensure continuous alignment with methodological requirements.

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

VVB shall check the applied stratification and sampling design at the time of design validation of the activity. Adherence to the conditions provided above in this decision shall be assessed.

4.2.4 | Directions for the Gold Standard, if applicable

The deviation allowed with conditions is regarding the sampling protocol to be applied for assessing SOC in an activity.

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): Precedence shall be considered on a case-to-case basis in line with 4.2.2 (h) above.	

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 : Peter FROEHLICH	Insert Text here
Email ID ⁴ : peter.froehlich@agricircle.com	Insert Text here
Organisation: ⁵ AGRICIRCLE AG	Insert Text here
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	GSXXXX GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)			
Project Title			
Registry link			
Scale	☐ Microscale (GS) ☐ Small scale ☐ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding date of latest status	☐ Listed dd/mm/yyyy	☐ Certified design dd/mm/yyyy	☐ Certified project dd/mm/yyyy
			☐ Other <i>If other, specify here</i> dd/mm/yyyy

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	Insert Text here
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 <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	Soil Organic Carbon Framework Methodology (SDG: 13 Climate Action)
	Version	Version 1.0
	Paragraph	Annex 1: Eligible Soil Sampling Protocols

6.2 | Description of the deviation

Title	Precision sampling with randomized plots within informed strata to enhance accuracy and reduce sampling effort	
	☐ Temporary	☒ 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	Dd/mm/yyyy
	End date	Dd/mm/yyyy
Summarise the changes	Describe the deviation requested from applicable rules/requirements. Please include all relevant information in support of the request.	
We request a deviation from the standard requirement of purely random or stratified random sampling for biomass and/or soil carbon monitoring. Instead, we propose a precision sampling approach, in which environmental factors (e.g., remote sensing data, elevation, slope, soil texture) are used to stratify the project area, followed by randomized sampling within each stratum.		
Refer to latest version of Deviation Request Requirements and Procedures for requirements and guidelines		
Reason for deviation	Describe the reasons for requesting deviation from applicable rules/requirements.	
The main reasons for requesting this deviation are to improve sampling efficiency, reduce field costs, and enhance spatial representativeness by leveraging remote sensing data and environmental covariates. In large and heterogeneous project areas, purely random or stratified random sampling often requires a high number of plots to achieve acceptable confidence levels. By using remote sensing products (e.g., Sentinel data, and cover, elevation models) to identify ecological gradients and stratify the landscape, we can strategically target sampling zones and then apply randomization within each stratum.		
Proposed resolution	We propose to resolve the deviation by implementing a precision sampling approach that uses remote sensing-informed stratification combined with randomized plot selection within each stratum. This method replaces a purely random sampling design for the affected monitoring period. To ensure compliance and methodological integrity: • Remote sensing datasets (e.g., NDVI, land cover, slope, elevation, soil maps) will be used to delineate ecologically meaningful strata across the project area. • Within each stratum, plots will be randomly selected, ensuring unbiased representation of spatial variability. • Sampling intensity will be calibrated to maintain the required statistical confidence level (e.g., 90/10 or 95/5), as per Gold Standard and IPCC guidance. Alignment with Gold Standard and Other Frameworks:	

	This approach is consistent with: • Gold Standard Soil Organic Carbon Framework Methodology (402_V1.0_LUF_AGR_FM_Soil-Organic-Carbon-Framework-Methodology.pdf): Annex 2 explicitly states that alternative sampling strategies may be used if scientifically justified and adequately documented. Our proposed method meets both conditions. • ICRAF Soil Carbon Protocol (Aynekulu et al., 2011): This protocol recommends the use of ecological stratification and model-informed sampling to account for spatial variability and reduce required sample sizes without compromising accuracy. • Verified Carbon Standard (VCS) SOC Module VMD0021: This module allows estimation of soil carbon using stratified and model-guided sampling designs, provided that the uncertainty and bias are assessed and reported. • IPCC 2006 Good Practice Guidelines (Vol. 4, AFOLU): The IPCC recognizes stratified random sampling as an accepted approach to improve sampling efficiency and reduce error in land-based carbon assessments. • FAO Global Soil Partnership (GSP) Soil Sampling Guidelines: These guidelines support the use of stratification informed by environmental variables for systematic soil carbon monitoring. Ensuring Accuracy, Completeness, and Conservativeness: • Accuracy: Achieved through stratification based on high-resolution environmental data and random selection within strata. • Completeness: All ecologically relevant strata within the project area are represented, ensuring no major land types or carbon pools are omitted. • Conservativeness: Bias is minimized through randomization; uncertainty is quantified and reported; no assumptions are made that would inflate emission reductions or carbon gains. This resolution maintains methodological rigor while reducing the resource burden and improving spatial representativeness, particularly in heterogeneous or difficult-to-access areas. It also supports long-term monitoring feasibility while upholding the environmental and statistical integrity required by the Gold Standard.
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>)

	Annual emission reduction/removal before applying deviation Annual emission reduction/removal after applying deviation XYZ tCO_{2e} XYZ tCO_{2e} ☐ any other matrix, please specify...
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 ☐ 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. Yuzugullu, O., Fajraoui, N., Don, A., & Liebisch, F. (2024). Satellite-based soil organic carbon mapping on European soils using available datasets and support sampling. *Science of Remote Sensing*, 9, 100118.

Document 2. Aynekulu, E. Vagen, T-G., Shephard, K., Winowiecki, L. 2011. A protocol for modeling, measurement and monitoring soil carbon stocks in agricultural landscapes. Version 1.1. World Agroforestry Centre, Nairobi.

Document 3. Verified Carbon Standard (VCS). (2011). Module VMD0021: Estimation of Stocks in the Soil Carbon Pool (Version 1.0). Available at: <https://verra.org/methodology/vmd0021-estimation-of-stocks-in-the-soil-carbon-pool-v1-0/>

Document 4. Intergovernmental Panel on Climate Change (IPCC). (2006). 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Volume 4 - Agriculture, Forestry, and Other Land Use (AFOLU). Available at: <https://www.ipcc-nggip.iges.or.jp/public/2006gl/>

Document 5. Food and Agriculture Organization (FAO). (2017). Guidelines for Soil Sampling and Analysis. FAO Global Soil Partnership (GSP). Available at: <http://www.fao.org/3/i7218en/I7218EN.pdf>

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