



Gold Standard[®]
for the Global Goals

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-176
Date of decision	07/08/2025
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**

Conditionally Approved

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

Deviation request is to allow the application of GS approved small-scale CDM methodology AMS-III.C (targeted at activities with annual emission reductions up to 60,000 tCO₂e) for a large-scale electric motorbike project in Ghana. A temporary approval is granted to use a valid version of AMS-III.C methodology for this project with the following conditions:

1. A cap on total issuances to 60,000 tCO₂e/year.
2. Once a large-scale EV methodology is available, the project must transition to that methodology to continue crediting. Requirement will be for project transition to new methodology within 2 years or at renewal of design certification.
3. A statement in the project documents that this does not set a precedent for other projects.

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

Through all appropriate and available options, VVB shall ensure compliance with this decision and all other GS4GG requirements in this project.

4.2.4 | Directions for the Gold Standard, if applicable

GS team shall review this project for certification on the basis of the decision of this deviation.

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)	

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 :	Herman Noppen
Email ID ⁴ :	h.noppen@southpole.com
Organisation: ⁵ :	South Pole
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	Still to be identified GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Ghana		
Project Title	E-Mobility Project in Ghana by Solar Taxi		
Registry link	Still to be identified		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding	☐ Listed	☐ Certified design	☐ Certified project ☒ Other

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

date of latest status				MADD development ongoing
	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy
Applied version of Standard	☒ GS4GG ☐ Previous version of Gold Standard			
	Version no.			
	☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
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 Insert name here			

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 Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number

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	SSC Methodology Emission reductions by electric and hybrid vehicles
	Version	V16.0
	Paragraph	2.2.12

6.2 | Description of the deviation

Title	Application of small scale methodology AMS-III.C for a large scale EV project	
Confirm the nature of changes related to deviation	☐ Temporary (e.g. not expected to occur beyond one monitoring period)	☒ Permanent (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	<i>Describe the deviation requested from applicable rules/requirements. Please include all relevant information in support of the request.</i> <i>Refer to latest version of Deviation Request Requirements and Procedures for requirements and guidelines</i> The project in question is an Article 6.2 mitigation activity developed under the Ghana-Switzerland bilateral agreement, aiming to deploy 48,500 electric motorbikes throughout Ghana by 2030 utilizing methodology AMS-III.C (Emissions reductions from electric and hybrid vehicles). The activity is part of Gold Standard and Sweden's pilot collaboration on interoperability of registries, and is being used as a case study to determine how collaborations between sovereign buyers and independent crediting standards can be enacted under Article 6. Currently, the project is in the Mitigation Activity Design Document (MADD) phase, with validation expected to begin in September 2025. The MADD is developed following the requirements of SEA, Ghana, and Gold Standard, combining necessary elements of all templates. As per procurement requirements defined by Sweden and Ghana, the activity aims to exceed 200,000 tCO₂e by 2030. Therefore, significant deployment of electric vehicles is necessary within 5 years, resulting in a scenario in which the emissions reductions during the last two years of the crediting period exceed 60,000 tCO₂e - the limit for use of small-scale methodologies.	

	There are other EV projects which have been developed using the same methodology, including a Verra grouped project by Spiro in Togo and Benin and another Article 6.2 project in Ghana by Wahu. The Wahu project also exceeds the threshold of 60 ktCO₂e/annum, indicating a wider need for flexibility until large-scale methodologies can be developed for EV projects.
Reason for deviation	<i>Describe the reasons for requesting deviation from applicable rules/requirements.</i> The small-scale methodology AMS-III.C has been identified as the most appropriate methodology for this project, as agreed with SEA upon commencement of drafting project documentation as part of the pilot structure. For comparison, other existing methodologies related to dissemination of electric motorbikes include: VM0038 - Allows large-scale projects in some cases, but as a Verra methodology it is not eligible for use under Gold Standard. This methodology also focuses on development of charging infrastructure rather than vehicle deployment and is therefore not applicable to this activity design. AMS-III.S - Also a small-scale methodology and less relevant to the activity type as it focuses on commercial transportation of passengers (like buses, jeepneys, commuter vans and tricycles for public transportation) and freight (like trucks, waste collection and other services with regular routes). AMS-III.BM and GS methodology 'Two and three wheeled personal transportation' - Also small-scale methodologies and less relevant to the activity type as it often involves the development of supporting infrastructure like bike lanes and is primarily focused on urban passenger transport. There are no large-scale methodologies that are applicable to this activity type, and therefore deviation is requested to exceed the 60 ktCO₂e limit. All other requirements of the methodology will be followed.
Proposed resolution	<i>Describe the proposed resolution for example proposed alternative monitoring arrangements for the non-conforming monitoring period.</i> <i>Describe how proposed resolution complies with the related requirements, where applicable, the accuracy, completeness and conservativeness is ensured.</i>

	<i>Please include all relevant information in support of the request.</i> The following measures are proposed to adjust methodology AMS-III.C to comply with requirements for large-scale projects. 1) Adjust tools used for proof of additionality: AMS-III.C refers to TOOL21 (Demonstration of additionality for small-scale activities). Since the activity will exceed the threshold of a small-scale activity, we propose to utilize TOOL01 instead (Tool for the demonstration and assessment of additionality), which has no size limit. This aligns with the new GS4GG requirements for additionality demonstration. The other option for proof of additionality as per AMS-III.C is the penetration rate, which is not affected by the deviation and is therefore still valid. 2) As an additional safeguard towards ensuring conservativeness, the Article 6.4 baseline standard will be used to determine the baseline. These measures will ensure conservativeness is upheld and proof of additionality is appropriate for the scale of the activity.				
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" data-bbox="472 1653 1441 1848"> <thead> <tr> <th data-bbox="472 1653 951 1787">Annual emission reduction/removal before applying deviation</th><th data-bbox="951 1653 1441 1787">Annual emission reduction/removal after applying deviation</th></tr> </thead> <tbody> <tr> <td data-bbox="472 1787 951 1848">XYZ tCO₂e</td><td data-bbox="951 1787 1441 1848">XYZ tCO₂e</td></tr> </tbody> </table> ☐ any other matrix, please specify...	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	<i>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.</i>				

	The impact of the deviation has implications for the additionality of the activity, as small- and large-scale activities are subject to different requirements for additionality. However, additionality as per AMS-III.C can be proven through demonstration of penetration rate of the technology below 2.5%, a threshold which the activity is not expected to exceed. Therefore, the deviation is not seen to be of major consequence to the additionality of the activity. Exceeding the threshold of a small-scale activity also has implications for the applicability of the methodology, which is intended to be remedied using the solutions outlined above (i.e., use of TOOL01 and PACM baseline setting requirements). In summary, allowing the activity to exceed the 60 ktCO₂e limit of small-scale activities is a necessary deviation to allow the continuation of the GS-SEA pilot in the absence of large-scale methodologies of the activity, and any impacts will be safeguarded against with substitution of relevant tools and application of the highest standards of conservativeness. Therefore, we see the deviation as having impacts that are rather administrative in nature and do not impact major aspects of project design or present significant risks.
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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.

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: - 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