

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-206
Date of decision	01/09/2025
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

The request for deviation is conditionally approved, in recognition of the continuing conflict situation in Somalia which renders physical site visits by VVBs unsafe and infeasible.

This deviation approval is valid only for the MP02 monitoring period (02/02/2024 – 19/06/2025) of VPA GS12285. Any future monitoring periods will require a fresh assessment of the security situation and re-submission if deviation is still necessary.

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

PD shall share the complete monitoring documentation and supporting evidence with both the Objective Observer and the VVB.

PD must ensure transparency of the processes, where observer can cross-check the monitoring data with field evidence.

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

1. VVB shall ensure all monitoring parameters, emission reduction calculations, and SDG claims are cross verified with both field evidence and project documentation.

2. VVB shall clearly document in the Verification Report that this verification was conducted under a deviation, referencing this approval and include an annex summarizing the role and findings of the Objective Observer.

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 :	PETER SCOTT
Email ID ⁴ :	peter.scott@burnmfg.com
Organisation: ⁵ :	BURN Manufacturing Co.
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 12285 GS XXXX
Host country(ies)	The Federal Republic of Somalia		
Project Title	GS10789 GS10790 RVPA-52: Efficient and Clean cooking for Households in Somalia		
Registry link	https://registry.goldstandard.org/projects/details/4290		
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 <i>If other, specify here</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

date of latest status	dd/mm/yyyy	dd/mm/yyyy	25/04/2024	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	DEV_651		
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	Principles and Requirements
	Version	V2.0
	Paragraph	Annex B Para 2

6.2 | Description of the deviation

Title	regarding deviation on case-to-case basis for on-site visit in conflict and emergency zones
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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	02/02/2024
	End date	19/06/2025
Summarise the changes	Paragraph 2.1.1 of ANNEX B of the Gold Standard Principles and Requirements, version 1.2, provides specific guidance for deviations for the verification of projects located in conflict zones or areas that pose high risk to life. The guidance provided dictates that the "Gold Standard will assess applications on a case-by-case basis. To be eligible for the rule deviation described therein, there must be evidence that demonstrates that VVBs are not willing to go on-site. Furthermore, the applicant must demonstrate prior experience working in conflict zones/areas that pose a high risk to life and/or health. And show involvement in other activities within the considered area, apart from implementing the project under review. Alternatively, the establishment of a formal collaboration with partners who have such experience and involvement in the considered area may qualify under these rules if the collaboration is sustained over the entire certification period of the Project." BURN Manufacturing Co. ("BURN") would like to request for this deviation for VPA GS12285. This project continues to help thousands of people in SOMALIA to access and use energy efficient biomass cookstoves which collectively abate GHG emissions and provide numerous, SDG-defined co-benefits. BURN is now requesting this deviation with respect to the planned MP02 verification for the VPA, which is situated in a Conflict Zone. As the project developer, BURN has continued to monitor the security situation in Somalia. Numerous regions in the Country have witnessed and continue to suffer the adverse effects of an on-going security crisis; with frequent terrorist attacks preventing major transport infrastructure points (highways, airports etc.) across the country. A situation which renders the ability of VVB's who are not native to the Country both perilous and unpredictable. 2 VVBs have confirmed that they are not willing to visit Somalia due to its insecurity, and the evidence for this has been provided as supporting documentation to this deviation request. At this moment, it is impossible to predict when the security situation will stabilize, and BURN is at risk of the project's timelines getting delayed and the issuance timelines for the VPA being delayed inordinately. With respect to this position, BURN would like to request that objective observer be allowed for the on-site audit as required by para 2.1.2 of Annex B of Principles and Requirements version 1.2.	

	In applying this deviation, BURN has adhered to the following core GS principles: - Environmental integrity: This deviation doesn't result in any over-estimation of GS VERs. - Contribution to Sustainable Development Goals (SDGs): The SDG contribution achieved are in line with GS4GG requirement and are not compromised. - Safeguarding principles and Requirements: Safeguarding Principles Assessment carried out for the VPA is in line with GS4GG requirements. - Compliance with host country regulations: The scope of this deviation work does not conflict with host country regulations.						
Reason for deviation	BURN is requesting this deviation with respect to the planned MP02 verification for the VPA, which is situated in a Conflict Zone.						
Proposed resolution	BURN would like to request that objective observer be allowed for the on-site audit as required by para 2.1.2 of Annex B of Principles and Requirements version 1.2.						
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>XYZ tCO₂e</td><td>XYZ tCO₂e</td></tr> <tr> <td></td><td></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	There is no impact on the project design, safeguarding principles, SDG assessment, data quality, potential risk or any other aspects of the project due to this deviation. The VPA will abide by all Gold Standard requirements.						
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	The proposed deviation does not compromise or have any negative influence on the accuracy, completeness or any other requirement of Gold Standard for Global Goals. This deviation is being requested considering project area falls under conflict zone which makes on-site verification visits difficult.								
VVB's assessment of impact of deviation request	There is no impact on the project design, safeguarding principles, SDG assessment, data quality, potential risk or any other aspects of the project due to this deviation. The VPA will abide by all Gold Standard requirements. The VVB has developed risk assessment based on non-conduction of on-site visit and possible mitigation to avoid risk associated with remote assessment as given in the section 3.3. Moreover, VVB agrees to GS decision of contracting an objective observer to carry out the on-site visit selected by GS. <u>Risk associated to the non-conduction of mandatory physical on-site inspection for verification</u> <table border="1"> <thead> <tr> <th>Sl. No</th> <th>Identification of potential risks</th> <th>Mitigation measures</th> <th>Risk Mitigated</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Risk associated to verify project implementation and operation with respect to the registered/included documents (PDD/PoA DD, VPA DD)</td> <td>The on-site assessment will be conducted by the experienced objective observer, he will conduct the interviews as directed by the lead auditor, capture the real time photograph as evidence and the implemented project technology can be checked by him. Cross checking the same through other relevant</td> <td> ☒ Yes ☐ No </td> </tr> </tbody> </table>	Sl. No	Identification of potential risks	Mitigation measures	Risk Mitigated	1.	Risk associated to verify project implementation and operation with respect to the registered/included documents (PDD/PoA DD, VPA DD)	The on-site assessment will be conducted by the experienced objective observer, he will conduct the interviews as directed by the lead auditor, capture the real time photograph as evidence and the implemented project technology can be checked by him. Cross checking the same through other relevant	☒ Yes ☐ No
Sl. No	Identification of potential risks	Mitigation measures	Risk Mitigated						
1.	Risk associated to verify project implementation and operation with respect to the registered/included documents (PDD/PoA DD, VPA DD)	The on-site assessment will be conducted by the experienced objective observer, he will conduct the interviews as directed by the lead auditor, capture the real time photograph as evidence and the implemented project technology can be checked by him. Cross checking the same through other relevant	☒ Yes ☐ No						

		documents such as project database, monitoring survey records. Checklist provided to the objective observed will contain relevant data to make sure that the project implementation is as per the registered PDD.	
2	Risk associated to verify implemented monitoring plan with the registered/included documents (PDD/PoA-DD, VPA-DD) and applied baseline and monitoring methodology	This risk can be mitigated by conducting the interview with end users by objective observer on site to cross check the Monitoring parameters described in certified versions of POA-DD / VPA-DD vis-à-vis their monitoring equipment/procedures and also to check records like project database, monitoring survey sheets and other relevant documents.	☒ Yes ☐ No
3	Risk associated to verify that the actual monitoring systems and procedures comply with the monitoring systems and procedures described	This risk can be mitigated during interview video call/video recording/a real time photo of the monitoring equipment through the help of	☒ Yes ☐ No

		in the monitoring plan	objective observer. Interview with the project implementation representatives, enumerators will be carried out. A checklist will be provided to the objective observer to make sure that actual monitoring systems and procedures comply with the procedures described in monitoring plan.	
	4	Risk associated to evaluate the GHG emission reduction data and express a conclusion with a reasonable level of assurance on whether the reported GHG emission reduction data is free from material misstatement	The identified risk can be mitigated by managing access to the records during audio/video calls. It can be verified whether project has adequate controls related to data changes/updates, version tracking, traceability, security and whether data is reproduceable from the sample sheets. Furthermore, data quality control personnel can also be interviewed to establish the level of assurance.	☒ Yes ☐ No
	5	Risk associated to verify that reported	The identified risk can be mitigated during	☒ Yes

		GHG emission data is sufficiently supported by evidence	remote interview by asking complete set of data for the monitoring period and Information provided in the monitoring report can be cross-checked with other sources such as Survey sheet/household interviews. To check whether, calculations of baseline emissions and emission reduction has been carried out in accordance with the formulae and methods described in the monitoring plan and the applied methodology. A checklist will be provided to the objective observer to check all the project specific GHG emission data.	☐ No
	6	Any outstanding FAR(s)/pending issue(s) since the previous physical site visit.	The identified risk is mitigated by reviewing the previous Verification report and found that no FAR is raised during last Monitoring Period.	☒ Yes ☐ No
	7	Any gaps in monitoring data, if any, that cannot be	As per the shared data no such gap exists for the	☒ Yes ☐ No

		justified as per applicable requirements.	proposed monitoring period.	
	8	Any design change(s)/temporary deviation(s) since the previous physical site visit.	The identified risk will be mitigated by reviewing the previous monitoring/verification report and any design change proposed/approved will be assessed complying to the GS principles and requirement. Checklist will be provided to the objective observed considering the available design change/deviation	☒ Yes ☐ No
VVB recommendation	The VVB has assessed the current situation in Somalia through the latest news report and from other local sources and concludes that performing an on-site audit in the upcoming month is found to be difficult as it poses risk to life for the VVB. Extending the validation and verification do not also prove to be a viable alternative considering the delay that will be caused for issuance. VVB agrees to GS decision of contracting an objective observer to carry out the on-site visit selected by GS.			
VVB details	VVB name:		Earthood Services Private Limited	
	Auditor name(s):		Sukanya Phukan	
	Email (s):		sukanya.phukan@earthood.in	

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. Applus: VVB Email declining OSV in Somalia

Document 2. Earthood: VVB Email declining OSV in Somalia

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