

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-210
Date of decision	05/09/2025
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 deviation request is not approved. The project developer must follow the Rule update [fNRB application for GS4GG certification](#) and other requirements of the principles and requirements.

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

The CME may access to the Tool 33 in option (b) from the following link:

<https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-33-v3.pdf>

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	☐ 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 :	Greg Murray
Email ID ⁴ :	g.murray@kokonetworks.com
Organisation: ⁵ :	KOKO NETWORKS LIMITED
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 GS10884	☒ VPA
GS ID	GSXXXX GSXXXX	GS XXXX GS XXXX	GS 11440 GS XXXX
Host country(ies)	KENYA		
Project Title	PoA: KOKO KENYA - ETHANOL COOKSTOVES PROGRAM (GS10884) VPA: GS10884 - KOKO KENYA - ETHANOL COOKSTOVES PROGRAM - CPA-0002 (GS11440)		
Registry link	PoA: https://registry.goldstandard.org/projects/details/2841 VPA: https://registry.goldstandard.org/projects/details/3461		
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	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>	19/08/2025 (PFR 6)	<i>dd/mm/yyyy</i>								
Applied version of Standard	☒ GS4GG ☐ Previous version of Gold Standard											
	<table border="1"> <tr> <td colspan="4">Version no.</td> </tr> <tr> <td>☐ 1.0</td> <td>☐ 1.1</td> <td>☐ 1.2</td> <td>☐ 2.2</td> </tr> </table>				Version no.				☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
Version no.												
☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2									
Transition date, if applicable	From previous GS version to GS4GG		<i>dd/mm/yyyy</i>									
	From another standard to GS4GG		25/08/2022									
	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	
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	Gold Standard Programme of Activity Requirements and Procedures
	Version	Version 3 dated 12/11/2024
	Paragraph	Paragraph 8.9.1 and 8.9.5

6.2 | Description of the deviation

Title	Extension of the deadline for RCP submission	
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	<u>Executive Summary</u> The Coordinating/Managing Entity (CME) for GS 11440 requests a deviation, from the applicable Gold Standard rules, to extend the Renewal of Crediting Period (RCP) submission deadline from 27 August 2025 to 31 December 2025, and to allow issuance of credits during this interim period. This request is sought due to the unexpected delays in the availability of approved fNRB methods under PACM A6.4, the absence of expected updates in recent MEP cycles, and the time required to complete a robust MoFuSS-based fNRB assessment.	
Reason for deviation	Current Situation The current crediting period for GS 11440 ends on 27 August 2025. Because of unresolved policy details and ongoing development of fNRB methods under PACM A6.4, the Coordinating/Managing Entity (CME) is unable to finalize the Renewal of Crediting Period (RCP) by the stipulated deadline. We therefore request an extension of the RCP submission deadline to 31 December 2025. Relevant GS Rules & Guidelines PP is requesting deviation from the following GS rules and requirements related to renewal of crediting period. Paragraph 5.1.45 & Paragraph 5.1.46 of Gold Standard, GS4GG principles and requirement, version 2.1, dated 31.01.2025. "5.1.45 To maintain Gold Standard Certified Project status beyond five years, a Project must undergo Design Certification Renewal. This process shall begin (defined by the submission of a Renewal opinion by a VVB for Design Review to Gold Standard) no later than the last date of current certification cycle. Note that review of the Design Certification Renewal may complete after the last date of current crediting period. In this case, the renewal date shall be the first day after the end date of the current certification cycle. 5.1.46 Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle	

	shall mean that no Certified Impact Statements shall be issued for the period of delay)." Paragraph 8.9.1 and 8.9.5 of Gold Standard Programme of Activity Requirements And Procedures V-3.0 dated 12.11.2024 "8.9.1 To maintain Gold Standard Certified status beyond five years, a PoA and its VPAs shall undergo Design Certification Renewal. This renewal process shall begin (defined by the submission of a validation report by a VVB for renewal of crediting period of PoA and its VPAs to Gold Standard) no later than the last date of current crediting period. 8.9.5 Delay in the submission of validation report by a VVB for renewal of crediting period beyond the last date of current crediting period will result: a) For PoA - no new real case/regular VPAs can be included during the delay period; b) Real case and regular VPAs - Certified Products and/or Impact Statements cannot be issued for period of delay. In such cases period of delay will be the period between end date of current crediting period and the submission of validation report by a VVB for renewal of crediting period. For example, a delay of 1 year beyond end date of the first crediting period shall mean that no issuance can be requested for period of delay of 1 year. However, the crediting period start and end date will be unchanged and will be determined as per para 8.9.2, above." Context and Ground for Deviation The timeline for completion of validation of the RCP for GS 11440 is impacted by a confluence of interrelated technical and procedural factors, primarily linked to the evolving framework for fNRB assessment. These are detailed below: 1. Evolving Requirements for fNRB Application As per the Rule Update on fNRB for GS4GG Certification (v1.0, 24 April 2025), paragraph 2.3.1 mandates that any issuance, design certification, inclusion, or renewal must apply one of the following fNRB estimation options: a) MoFuSS-derived values; b) Tool 33 default values or revised Tool 30 under PACM A6.4; or c) New fNRB method developed under PACM A6.4/Gold Standard. Currently, the CME does not have access to either Option (b) or Option (c) of the Rule update. This has left the project reliant on developing MoFuSS-derived values, which entails a detailed and resource-intensive process. 2. Ongoing Internal MoFuSS Work In order to derive robust Kenya-specific fNRB value from MoFuSS framework, the CME has undertaken an internal study for
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	development of the programming codes, satellite imaging data-sets, other relevant demographic and fuel consumption data-sets and assumptions. This involves: • Collection and processing of field and regional data; • Biomass and consumption modeling; • Data Validation • Internal QA/QC and validation checks; This work is essential to meet Gold Standard's expectations for methodological rigor and conservativeness. However, it is also time-consuming and sensitive to the outcomes of evolving policy guidance under PACM. 3. Delays in PACM/MEP Delivery Timeline According to the MEP workplan v2.0, updated fNRB values under PACM were expected to open for public consultation around MEP-07 and proceed to recommendation at MEP-08. MEP-07 concluded without an fNRB consultation launch, and fNRB was not listed in the MEP-08 annotated agenda, indicating that additional technical work is still required. This policy uncertainty has significantly hindered the CME's & the VVB's ability to ensure alignment of the key baseline assumptions with the much awaited guidance from the PACM Secretariat.
Proposed resolution	Request for Extension of Submission Deadline Due to the above conditions affecting finalization of project documents, CME foresee inability to complete the validation of the RCP request by the stipulated deadline (27/08/2025). CME anticipates that these volatile and unclear situations may extend up to the end of the year 2025 which would interrupt the decision making on critical parameter values. Hence, CME requests a deviation from the above mentioned guidelines to allow extension of the submission deadline for the Renewal of Crediting Period Request for the projects, GS 11440, specifically: • Exemption from the requirement (of RCP submission deadline) as defined in Paragraph 5.1.45 of Principle & Requirements and Paragraph 8.9.1 of PoA Requirements, thereby granting extension of submission deadline for Renewal of Crediting Period (RCP) Request till 31st December 2025. • Exemption from the requirement (of curtailment of issuance cycle during the delay period) as defined in Paragraph 5.1.46 of Principle & Requirements and Paragraph 8.9.1 of PoA Requirements, thereby granting permission to allow continuation of the issuance cycle under Crediting Period 2 from the next day of the current crediting period i.e. 28th August 2025 to 27th August 2030. Given the unforeseen challenges, <u>we respectfully request a postponement of the submission deadline to December 31, 2025.</u> This extension will allow us the necessary time to diligently compile and

	finalize all requisite information, thereby ensuring a comprehensive and accurate submission.						
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" style="width: 100%; background-color: #00a0a0; color: white;"> <thead> <tr> <th style="width: 50%;">Annual emission reduction/removal before applying deviation</th><th style="width: 50%;">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 relevant areas, apart from the regulatory compliance. There is no impact of the change on any of the fundamental principles of the Gold Standard or any core 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	Not Applicable	
VVB's assessment of impact of deviation request		
VVB recommendation		
VVB details	VVB name:	
	Auditor name(s):	

	Email (s):	
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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. https://www.the-star.co.ke/news/2024-11-20-heavy-rainfall-to-continue-as-la-nina-downscales-say-forecasters?utm_source=chatgpt.com

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