

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.

Table of Content

1 General Guidelines.....	2
1.1 Applicability.....	2
2 Submission of deviation form	2
3 Implementation of deviation decision	2
4 Decision summary	4
4.1 General information.....	4
4.2 Decision.....	4
4.3 Applicability to other activities	4
5 Deviation Request Details.....	5
5.1 Submitted by.....	5
5.2 Details of the entity and its representative submitting the form	5
5.3 Background information.....	5
5.4 Project deviation history	6
6 Deviation detail	6
6.1 Standard document reference.....	6
6.2 Description of the deviation.....	6
6.3 VVB information.....	10
6.4 VVB's assessment	10
6.5 Documents:	10

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVREQ-218
Date of decision	12/09/2025
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

Conditionally Approved

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

The Project Developer shall ensure that all monitoring data collected during the period is made available for the first physical site visit in September 2025.

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

The VVB shall validate that monitoring activities conducted during the deviation period are consistent with Gold Standard requirements.

During the planned physical site visit, the VVB shall verify and cross check the continuity of operations, data quality, and system performance for the full monitoring period (03/02/2023 – 02/02/2025)

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)	

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 :	Anantha Karthik Rajagopalan
Email ID ⁴ :	anantha@upenergygroup.com
Organisation: ⁵ :	UpEnergy Group
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	GS11320	10963	11
Host country(ies)	Zambia		
Project Title	Community Carbon Safe Water Drinking Programme-VPA-11		
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 10/12/2021	☒ Certified design 26/04/2023	☐ 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	☐ 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 <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
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	Deviations Request Requirements and Procedures
	Version	V2.0
	Paragraph	

6.2 | Description of the deviation

Title	Temporary deviation from the first physical site visit due to severe drought and the Cholera outbreak in Zambia	
	☒ 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	03/02/2023
	End date	02/02/2025
Summarise the changes	The project in Lusaka, Zambia, aims to provide Institutional Water Treatment (IWT) systems to public institutions using Water Purification Systems (WPS) to ensure access to safe drinking water and reduce greenhouse gas (GHG) emissions that would otherwise result from the use of nonrenewable biomass for water treatment. Under this VPA, a total of 62 IWTs were successfully installed in educational institutions, with the last installation completed on 18th July 2023, during the current monitoring period. The first physical site visit to the Institutional Water Treatment (IWT) project locations in Lusaka, Zambia, could not be conducted within two years from the project design certified date (26th April 2023), i.e., during 2024 and the first half of 2025, because of the country's ongoing severe drought crisis⁶ and Cholera outbreak that began in 2023 and persisted through 2024 and the first half of 2025⁷. The Zambian government declared the drought a national disaster and emergency on 29th February 2024⁶. While these extreme conditions created logistical and safety challenges that prevented the physical site visit, the project's performance and monitoring activities were not adversely impacted. The project's latest IWT installation was on 18th July 2023. Regular monitoring surveys and data collection were carried out in February 2024 and March 2025, and the systems continued to operate as planned, supplying safe drinking water to the beneficiary institutions.	
Reason for deviation	The project aims to distribute Institutional Water Treatment (IWT) systems using Water Purification Systems (WPS) to public institutions in Zambia, to reduce fuel consumption and greenhouse gas emissions. The first monitoring period runs from 03/02/2023 to 02/02/2025 (both dates included). A comprehensive monitoring system is in place to track distribution, stove performance, and user engagement through surveys and GPS data collection. However, due to the ongoing Cholera outbreak and drought, a site visit was not feasible at that time and is therefore proposed to be tentatively held in the month of September 2025. This drought, triggered by the 2023/2024 El Niño phenomenon, has devastated crops, and affected over nine million people across 84	

⁶ <https://www.mofaic.gov.zm/wp-content/uploads/2024/03/Statement-on-Drought-as-a-National-Disaster-and-Emergency-H.E..docx.pdf>

<https://reliefweb.int/report/zambia/unhcr-zambia-drought-emergency-update-no-1-31-july-2024>

[https://www.acaps.org/fileadmin/Data_Product/Main_media/20250116_ACAPS_Zambia - Update on the impact of drought .pdf](https://www.acaps.org/fileadmin/Data_Product/Main_media/20250116_ACAPS_Zambia_Update_on_the_impact_of_drought.pdf)

⁷ https://www.afro.who.int/sites/default/files/2024-01/Donor_Alert_Zambia_January_2024_final.pdf

https://www.who.int/docs/default-source/coronaviruse/situation-reports/20250609_multi-country_outbreak-of-cholera_sitrep_27.pdf?sfvrsn=24b55bfe_3

	districts. The government declared the situation a national disaster in February 2024. As a result, approximately 5.5 million people require humanitarian assistance, and an estimated 5.8 million are projected to face crisis-level hunger (IPC Phase 3) through early 2025. Sighting from the article: https://reliefweb.int/report/zambia/zambia-drought-flash-appeal-response-monitoring-march-2025 As per the WHO Article published about the cholera outbreak in Zambia, a severe cholera outbreak in Zambia, declared a critical public health emergency in October 2023. The epidemic has rapidly spread to all ten provinces, affecting 62 districts with nearly 15,000 reported cases and over 500 deaths, overwhelming the healthcare system. With ongoing emergency response efforts, resource constraints, and heightened health risks, conducting field visits at this time is impractical and unsafe. Sighting from article: https://www.afro.who.int/sites/default/files/2024-01/Donor_Alert_Zambia_January_2024_final.pdf						
Proposed resolution	The first physical site visit was supposed to be scheduled in March 2024, tentatively. Given the escalating drought situation and cholera outbreak, we have determined it is necessary to request for deviation for the Zambia GS 11320 VPA 11 Project. We propose that the first physical site visit be carried out in September of 2025, requesting the deviation to conduct the first physical site visit after 2 years from the project start date for this monitoring period.						
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><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... There is a temporary deviation in the timing of the first physical site visit.	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	The requested deviation from the requirement to conduct the first physical site visit during the current monitoring period is due to two major overlapping draught and health emergencies in Zambia. A severe, El Niño-induced drought—declared a national disaster in February 2024—has affected over nine million people, resulting in widespread food and water insecurity and disrupting essential services. In parallel,						

	a critical cholera outbreak has spread across all ten provinces, overwhelming the healthcare system and increasing health and safety risks. These conditions have made it impractical and unsafe to carry out field activities, including site visits. Therefore, the visit is proposed for September of 2025, when the situation is expected to stabilize.
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1. Background Information:

The purpose of the VPA is to provide Institutional water treatment (IWT) to institutional users with water purification system (WPS) with an aim to provide safe drinking water and reduce/avoid greenhouse gas (GHG) emissions from the burning of nonrenewable woody biomass and/or charcoal for water treatment in Lusaka, Zambia.

The VPA is implemented by UpEnergy Group (UpEnergy/UpE) which is also the Coordinating and Managing Entity (CME) of the PoA. UpEnergy has been implementing the programme in partnership with local partners and has been ensuring the last-mile distribution/installation of the Improved Cookstoves to the beneficiaries.

2. Deviation Detail

The VPA 11 (GS 11320) involves the promotion and distribution of water purification system (WPS) such as Institution Water Treatment (IWT) technologies with an aim to provide safe drinking in Zambia for use by students and institutional staffs and reduce/avoid greenhouse gas (GHG) emissions from the burning of non-renewable woody biomass for water treatment in Zambia, hence reducing use of non-renewable fuel and associated reduction in deforestation.

The VPA involve marketing, distribution, and creating awareness for WPS for public institutions in Zambia. In total 62 IWTs has been successfully distributed and installed in the educational institutions under this VPA during this project monitoring period, the type of water filter (IWT) installed in Zambia.

Due to the ongoing severe drought and Cholera outbreak in Zambia—one of the worst in the country's recent history—site visit was not be possible in 2024 and the first half of 2025. Triggered by the 2023/2024 El Niño, the drought has devastated crops, and impacted over nine million people across 84 districts. Declared a national disaster in February 2024, the crisis has left 5.5 million people in need of humanitarian assistance, with 5.8 million projected to face crisis-level hunger (IPC Phase 3) through early 2025.

The severe cholera outbreak in Zambia, declared a public health emergency in October 2023, has rapidly spread across all ten provinces, affecting 62 districts with nearly 15,000 reported cases and over 500 deaths. With a case fatality rate of 3.8% and ongoing transmission, the healthcare system is under extreme pressure. The outbreak necessitates urgent interventions, including enhanced surveillance, improved WASH services, and intensified community engagement. Given the scale of the crisis, the health risks involved, and the resource constraints, conducting site visits during this period is not feasible and poses significant safety concerns, justifying the request for deviation.

These conditions made a physical site visit unfeasible in 2024 and the first half of 2025, but the project developer is planning to conduct this in the month of September 2025.

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</i> <i>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. Monitoring report

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