



Gold Standard[®]
for the Global Goals

FORM

FORM - DEVIATION REQUEST SUBMISSION

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RELATED DOCUMENTS

– [Deviations Approval Requirements and Procedures](#)

CONTACT DETAILS

The Gold Standard Foundation
International Environment House 2
Chemin de Balxert 7-9
1219 Châtelaine Geneva, Switzerland
Tel +41 22 788 70 80
Email help@goldstandard.org

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	DEVREQ-221
Date of decision	25/09/2025
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 is approved.

The CME shall comply with the requirements stated in Annex B – Conflict and Emergency Zones of the latest [Gold Standard Principles and Requirements](#).

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

The CME shall ensure that the Objective Observer (OO) has been selected for the on-site audit as required by para 2.1.2 of the Annex B of Principles and Requirements version 2.1 and have conducted the audit under the guidance of a GS approved VVB. The CME will be responsible for contracting and covering the costs of the Objective Observer. The relationship between and among the CME, the Objective Observer and Gold Standard shall be established in a Memorandum of Understanding that must be signed by all parties. The CME shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

Note – The CME shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the developer. The CME shall comply with all other applicable standard requirements unless specifically mentioned in the deviation decision.

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

The VVB shall provide a checklist to the selected Objective Observer before the site visit, to assist the Objective Observer in assessing the relevant aspects related to the Project's Verification. The checklist must be limited to issues that the VVB thinks would be necessary to check on-site to form the Verification opinion.

The verifying VVB shall ensure the following:

- The Objective observer (OO) is selected to conduct the assessment as per the checklist provided.

- The site visit conducted by the OO during the verification shall confirm the status of the project operation and the mitigation plans in place to tackle the negative impacts of the project.
- Assess and demonstrate how the selected OO has prior experience working in conflict zones/areas that pose a high risk to life and/or health. The VVB shall also demonstrate OO's involvement in other activities within the project's geographical area.

The Verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provides its opinion in the Verification Report.

4.2.4 | Directions for the Gold Standard, if applicable

The assurance team shall review both the CME's response and the VVB's assessment/opinion of the same and take appropriate steps.

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 :	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	GS11433, GS11435 GS12509
Host country(ies)	Democratic Republic of Congo		
Project Title	GS10789 VPA5: Efficient and Clean Cooking for households in Democratic Republic of Congo (DRC) GS10789 VPA7: Efficient and Clean Cooking for households in Democratic Republic of Congo (DRC) GS10789 GS 10790 RVPA-32: Efficient and Clean Cooking for households in DRC		
Registry link	https://registry.goldstandard.org/projects/details/3454 https://registry.goldstandard.org/projects/details/3456 https://registry.goldstandard.org/projects/details/4431		

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

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	☒ Certified design	☒ Certified project	☐ Other <i>If other, specify here</i>
		<i>VPA32:</i> <i>29/01/2025</i>	<i>VPA5:</i> <i>17/01/2025,</i> <i>VPA7:</i> <i>16/05/2025</i>	<i>dd/mm/yyyy</i>
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		<i>dd/mm/yyyy</i>	
	From another standard to GS4GG		<i>dd/mm/yyyy</i>	
	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	<i>DEVQR-97</i>		
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	Principles and Requirements
	Version	V2.1
	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	
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	VPA 5: 14/05/2024 (MP4) & 16/09/2025 (MP5), VPA 7: 14/05/2024, VPA 32: 17/09/2024
	End date	VPA 5: 15/09/2025 (MP4) & 23/12/2025 (MP5), VPA 7: 13/05/2025, VPA 32: 13/05/2025
Summarise the changes	Paragraph 2.1.1 of ANNEX B of the Gold Standard Principles and Requirements, version 2.1, 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 area considered, 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 VPAs GS11433, GS11435 & GS12509. These projects continue to help thousands of people in the Democratic Republic of Congo 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 validation & verification for the VPAs, which is situated in a Conflict	

	Zone. As the project developer, BURN has continued to monitor the security situation in DRC. Numerous regions in the Country have witnessed and continue to suffer the adverse effects of an on-going security crisis; with armed Conflict, Crime, Civil Unrest, Kidnapping, and Terrorism, 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 DRC 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 2.1. 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 validation & verification for the VPAs, 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 2.1.
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	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 visits and possible mitigation to avoid risk associated with remote assessment as given in 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>

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 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.	☒ Yes ☐ No
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	☒ Yes ☐ No

		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.	
3	Risk associated to verify that the actual monitoring systems and procedures comply with the monitoring systems and procedures described in the monitoring plan	This risk can be mitigated during interview video call/video recording/a real time photo of the monitoring equipment through the help of 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.	☒ Yes ☐ No
4	Risk associated to evaluate the GHG emission reduction data and express a conclusion with a reasonable level of	The identified risk can be mitigated by managing access to the records during audio/video calls. It can be verified	☒ Yes ☐ No

		assurance on whether the reported GHG emission reduction data is free from material misstatement	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.	
	5	Risk associated to verify that reported GHG emission data is sufficiently supported by evidence	The identified risk can be mitigated during 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	☒ Yes ☐ No

			methodology. A checklist will be provided to the objective observer to check all the project specific GHG emission data.	
	6	Any outstanding FAR(s)/pending issue(s) since the previous physical site visit.	The identified risk is mitigated by reviewing the Validation 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 justified as per applicable requirements.	As per the shared data no such gap exists for the proposed monitoring period.	☒ Yes ☐ No
	8	Any design change(s)/temporary deviation(s) since the previous physical site visit.	The identified risk will be mitigated by reviewing the validation 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 DRC 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. VKU: VVB Email declining OSV in DRC

Document 2. Earthood: VVB Email declining OSV in DRC

Travel Ban notices:

[Democratic Republic of the Congo travel advice - GOV.UK](#)

[Democratic Republic of the Congo Travel Advice & Safety | Smartraveller](#)

[Democratic Republic of the Congo Travel Advisory](#)

[Democratic Republic of the Congo International Travel Information](#)

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