

**FORM**

## **FORM - DEVIATION REQUEST SUBMISSION**

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**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](mailto: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-232
Date of decision	18/11/2025
Decision	<input checked="" type="checkbox"/> <b>Approved</b> [No precondition to apply the deviation decision] <input type="checkbox"/> <b>Conditionally approved</b> [Decision is subject to compliance with the precondition defined below] <input type="checkbox"/> <b>Not approved</b> [reason for rejection is provided in decision summary]

### 4.2 | Decision

#### 4.2.1 | Decision Summary

The request is approved.

The approval is based on the justification that the age-based sampling requirement is not technically necessary for Water Purification Systems (WPS) due to their non-degrading operational nature and continued functionality is restored through regular replacement of consumable components.

Note - This deviation approval applies from the start of the first Monitoring Period (30/07/2025) and shall remain valid for all subsequent monitoring periods, unless superseded by updated Gold Standard methodology requirements.

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

The Project developer must ensure the following:

1. The sampling approach complies with Appendix 3 "Guidelines for Sampling and Surveys for CDM Project Activities and Programmes of Activities" (95% confidence, 10% precision)
2. The stratified random sampling approach applied for sample size calculation for the monitoring survey must meet all requirements under Appendix 3.
3. Continuity of monitoring must be demonstrated, ensuring no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). If any gap(s) exist, a conservative approach must be applied in line with section 3 of the Deviation Approval Requirements and Procedures and overarching Gold Standard principles.
4. The deviation shall be reflected in the Monitoring Report for each applicable monitoring period and will remain subject to VVB assessment and confirmation of continued ongoing applicability.

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

VVB shall evaluate the project's compliance with the above conditions and provide an assessment within the Validation/Verification Report.

#### 4.2.4 | Directions for the Gold Standard, if applicable



### 4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances? <sup>1</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does this decision set a precedent for future projects with similar circumstances? <sup>2</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Precedent details (if applicable to other activities)	

<sup>1</sup> 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.

<sup>2</sup> 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 <sup>3</sup> :	Evan Haigler
Email ID <sup>4</sup> :	ehaigler@impactcarbon.org
Organisation: <sup>5</sup> :	Impact Water
Are you an authorized project participant as per the cover letter submitted for this activity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

### 5.3 | Background information

Type	<input type="checkbox"/> Project activity	<input checked="" type="checkbox"/> PoA GSXXXX	<input checked="" type="checkbox"/> VPA
GS ID	GSXXXX GSXXXX	GS 2393	GS 23403 GS 23404 GS 23405 GS 23406 GS 23407

Host country(ies)	Uganda
Project Title	PoA: Impact Water Safe Drinking Water Initiative VPAs: GS2393 VPA_1 Impact Water Safe Drinking Water initiative in Uganda GS2393 GS23403 RVPA_1 Impact Water Safe Drinking Water initiative in Uganda VPA1 GS2393 GS23403 RVPA_1 Impact Water Safe Drinking Water initiative in Uganda VPA2 GS2393 GS23403 RVPA_1 Impact Water Safe Drinking Water initiative in Uganda VPA3

<sup>3</sup> Name of the individual representing the entity requesting the deviation

<sup>4</sup> Email ID for further correspondence related to the deviation request

<sup>5</sup> The name of the entity requesting the deviation

GS2393 GS23403 RVPA\_1 Impact Water Safe Drinking Water initiative  
in Uganda VPA4

Registry link

GS ID	Link
GS23403	<a href="https://registry.goldstandard.org/projects/details/5327">https://registry.goldstandard.org/projects/details/5327</a>
GS23404	<a href="https://registry.goldstandard.org/projects/details/5328">https://registry.goldstandard.org/projects/details/5328</a>
GS23405	<a href="https://registry.goldstandard.org/projects/details/5329">https://registry.goldstandard.org/projects/details/5329</a>
GS23406	<a href="https://registry.goldstandard.org/projects/details/5330">https://registry.goldstandard.org/projects/details/5330</a>
GS23407	<a href="https://registry.goldstandard.org/projects/details/5331">https://registry.goldstandard.org/projects/details/5331</a>

Scale

- ☐ Microscale (GS)  
☒ Small scale  
☐ Large scale  
☐ Other, if applicable please specify below  
*Insert text here*

Certification Status  
and corresponding  
date of latest  
status

<input checked="" type="checkbox"/> Listed	<input type="checkbox"/> Certified design	<input type="checkbox"/> Certified project	<input type="checkbox"/> Other <i>If other, specify here</i>
16/09/2025	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy

Applied version of  
Standard

<input checked="" type="checkbox"/> GS4GG				
<input type="checkbox"/> Previous version of Gold Standard	Version no.			
	<input type="checkbox"/> 1.0	<input type="checkbox"/> 1.1	<input type="checkbox"/> 1.2	<input type="checkbox"/> 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	<input type="checkbox"/> CDM <input type="checkbox"/> 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.		<input type="checkbox"/> Yes
		<input checked="" type="checkbox"/> No
Reference number	Insert Text here	
Status of the deviation	<input type="checkbox"/> Approved	<input type="checkbox"/> Rejected <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>Summary of the findings</b> <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	METHODOLOGY FOR EMISSION REDUCTIONS FROM SAFE DRINKING WATER SUPPLY
	Version	Version 1.0
	Paragraph	Parameter Table SDWS 29 and page 51 wrt to SDWS29 of the applied methodology

**6.2 | Description of the deviation**

Title	Deviation from ageing-based survey for Water purification Systems (WPS)	
Confirm the nature of changes related to deviation	<input type="checkbox"/> Temporary (e.g. not expected to occur beyond one monitoring period)	<input checked="" type="checkbox"/> Permanent (e.g. deviation from requirements prior to submission for certification)
	<p>Identical deviations (DEV-184 and DEVRQ-174) have already been approved for VPAs (GS11259-GS11288, GS11289-GS11305, GS12251-GS12275 and GS12390-GS12420 under the PoA GS11189.</p> <p>The VPAs GS23403-GS23407 under PoA GS2393 adopt the same impact quantification methodology as the above-listed VPAs under PoA GS11189. Accordingly, the Project Participant (PP) requests approval for a deviation to align the monitoring plan of these VPAs with the approach already approved under DEV-184 and DEVRQ-174.</p>	
Relevant monitoring period, if applicable	Start date	30/07/2025
	End date	--



Summarise the changes	<p>The concerned VPAs under PoA GS2393 are based on GS4GG approved large scale methodology "Methodology for emission reductions from safe drinking water supply" version 1.0, 03/05/2021. All five concerned small-scale VPAs in Uganda involve the implementation of Water Purification Systems (WPS). These VPAs deploy UV and chlorination-based WPS devices (such as UltraTAB, UltraFLO etc.) to provide safe drinking water to project institutions.</p> <p><b>Specific authorization is requested for the following requirements of the methodology for project surveys:</b></p> <ol style="list-style-type: none"> <li>1. As per applied methodology "Methodology for emission reductions from safe drinking water supply version 1.0, 03/05/2021" parameter table SDWS 29 - <i>The minimum sample size for IWT - for individual technology age group shall be determined considering the project technology type and in line with the sampling approach applied</i>"</li> <li>2. Also, page 51 of the applied methodology, for parameter SDWS29, refers to a minimum sample size of 30 per technology age.</li> </ol> <p>Unlike ICS technologies that age significantly over time, WPS technologies are not affected by ageing, and are resupplied, maintained, and/or replaced on an ongoing basis. The WPS technologies operate on consumable modules basis i.e., once their treatment capacity (cartridge/tablets/UV bulbs etc.) is fully consumed, their consumables (cartridges/tablets/UV bulbs etc.) are replaced making them revive their useful lifetime (age) again. For example, Chlorination based UltraFLO cartridge can be replaced once it is consumed and the WPS is replenished with a new cartridge and hence a given system can run for eternity with regular cartridge supplies.</p> <p>Also, unlike ICS (where ICS efficiency degrades over time and emission reduction is a function of thermal efficiency) WPS operate on binary performance rather than reducing performance i.e., a WPS irrespective of its age will either provide safe water or unsafe water.</p> <p>Thus, requirement to monitor the systems per technology age is deemed superfluous and only the monitoring of each WPS technology, irrespective of age, shall be applicable for WPS devices.</p> <p>Additionally, all the concerned VPAs under the PoA are implemented in Uganda, thus they are identical as they follow same management plan, operational plan and technologies.</p> <p>Given the aforesaid VPAs are identical, hence the CME shall be allowed to conduct the project surveys for WPS stratifying each technology irrespective of their age.</p> <p>An illustration for concerned VPAs (for cross VPA sampling) wrt to sample size is given below:</p>
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	Sample Size - Operational Units			
	WPS Type (Sampling Frame)	Anticipated Sales (Sampling Frame Size)	Expected operational rate (%)	Calculated Sample Size (n)
	UltraViolet System	3,000	90%	84
	UltraFlo	100	90%	30
	UltraTab	500	90%	30
	Sample size determination			
	Estimated Operation Unitsi (p)			90%
	Estimated Standard Deviation of Operational Unitsi (SD)			30.0%
	$V = (SD/p)^2$			0.11
	Sample Size required (Operational Unitsi)			100
	<p>Thus, in line with the methodology the following have been considered:</p> <ol style="list-style-type: none"> <li>1. A confidence level of 95% (for cross VPA sampling) and a precision of 10% (for annual sampling) has been applied.</li> <li>2. A stratified random sampling approach has been applied stratifying on the basis of technology.</li> <li>3. The minimum sample size for the group has been considered as 100.</li> <li>4. For each technology category, the minimum sample size is considered as 30. In the above example, the sample size arrived for UltraFlo is only 3 samples which was considered as 30 instead. Similarly, the sample size arrived for UltraTab is only 14 samples which was considered as 30 instead.</li> <li>5. Total sample size therefore is 144 (=84+30+30).</li> </ol> <p>The aforesaid is in compliance with the latest Standard: Sampling and surveys for CDM project, version 09.0 and "Guidelines for sampling and surveys for CDM project activities and programmes of activities", version 04.0.</p>			
Reason for deviation	<p>Without this deviation approval, (considering age and technology), a large number of (400-500) samples would need to be monitored for methodology compliance, which is not feasible to implement and rather overly superfluous. It would also be a very poor use of resources, given desired reliability and precision can be achieved with much lower sample sizes i.e. 100 - 150 samples (as illustrated above), preserving program resources for improving usage, hygiene campaigns, and other critical program activities.</p>			
Proposed resolution	<p>Given the aforesaid VPAs are identical, hence the CME shall be allowed to conduct the project surveys for WPS stratifying each technology irrespective of their age.</p> <p>Further, the deviation is requested to be universally applicable to all concerned VPAs (real Case VPA: GS23403 and its regular case VPAs: GS23404 to GS23407 and identical VPAs) and future regular case VPAs that will be included under the real case VPA GS23403, while ensuring the following:</p> <ul style="list-style-type: none"> <li>• The stratified random sampling approach applied for sample size calculation for the monitoring survey shall meet all the requirements under Appendix 3 of Guideline: Sampling and surveys for CDM project activities and programmes of activities.</li> </ul>			

	<ul style="list-style-type: none"> <li>The CME shall maintain continuity in the project's monitoring activities, and PD can justify that no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). However, if gaps(s) exist, the project shall justify that conservative approach(es) have been applied in line with overarching GS principles (as applicable).</li> </ul>						
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	<p>Select the relevant area:</p> <p><input type="checkbox"/> Project design</p> <p><input type="checkbox"/> Local stakeholder consultation</p> <p><input type="checkbox"/> Safeguarding principles</p> <p><input type="checkbox"/> SDG assessment</p> <p><input type="checkbox"/> Regulatory compliance</p> <p><input type="checkbox"/> Additionality</p> <p><input type="checkbox"/> Applicability of methodology</p> <p><input type="checkbox"/> Annual emission reduction volume (if yes, fill the table below)</p> <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 tCO<sub>2</sub>e</td><td>XYZ tCO<sub>2</sub>e</td></tr> <tr> <td></td><td></td></tr> </tbody> </table> <p><input type="checkbox"/> any other matrix, please specify...</p>	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO <sub>2</sub> e	XYZ tCO <sub>2</sub> e		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
XYZ tCO <sub>2</sub> e	XYZ tCO <sub>2</sub> e						
Summary of the impact	The proposed deviation does not have any impact on any of the above relevant areas. The Emission reductions before and after applying the deviation shall remain the same.						
Insert text here							

### 6.3 | VVB information

<p>Is a VVB opinion on the deviation request required?</p> <p><i>VVB opinion shall be included, where required by the requirements under <a href="#">Deviations Request Requirements and Procedures</a> or request is submitted by the VVB.</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Identical deviations (DEV-184 and DEVRQ-174) have already been approved for VPAs (GS11259-GS11288, GS11289-GS11305, GS12251-GS12275 and GS12390-GS12420 under the PoA GS11189.</p>
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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):	
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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://globalgoals.goldstandard.org/standards/DEV\\_184-Deviation-Request.pdf](https://globalgoals.goldstandard.org/standards/DEV_184-Deviation-Request.pdf)

Document 2.

[DEVRO-174.pdf](#)

Document 3.

[GS23403-23407 Preliminary Review Submission Form GS Decision.pdf](#)

**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: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> <li>- Guidance on VVB opinion</li> </ul>
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