



## FORM

# FORM - DEVIATION REQUEST SUBMISSION

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**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](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	DEVRQ-239
Date of decision	31/10/2025
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 deviation request is approved.

The CME could use the results of the baseline survey and KPT conducted at the time of previous crediting period validation of the VPA for ex-ante emission reduction estimation of renewing crediting period. The CME must conduct a new baseline survey and KPT prior to the first verification of the next crediting period, and the updated results could be incorporated through an issuance track design change during the verification process.

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

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 CME. The CME shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision. The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the project document.

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

The VVB shall, through appropriate means at disposal, evaluate the project's compliance with the above-mentioned conditions and provide VVB opinion in the validation/verification report.

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

The review team shall check the information reported by the CME and the VVB for appropriateness, accuracy and consistency.

### 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)

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<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> :	PETER SCOTT
Email ID <sup>4</sup> :	peter.scott@burnmfg.com
Organisation <sup>5</sup> :	BURN Manufacturing Co.
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 type="checkbox"/> PoA GSXXXX	<input checked="" type="checkbox"/> VPA
GS ID	GSXXXX GSXXXX	GS XXXX GS XXXX	GS11433
Host country(ies)	Democratic Republic of Congo		
Project Title	GS10789 VPA5: Efficient and Clean Cooking for households in Democratic Republic of Congo (DRC)		
Registry link	<a href="https://registry.goldstandard.org/projects/details/3454">https://registry.goldstandard.org/projects/details/3454</a>		
Scale	<input type="checkbox"/> Microscale (GS) <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale <input type="checkbox"/> Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding	<input type="checkbox"/> Listed	<input type="checkbox"/> Certified design	<input checked="" type="checkbox"/> Certified project  <i>If other, specify here</i>

<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

date of latest status	dd/mm/yyyy	17/01/2025,	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	<input type="checkbox"/> Renewable Energy Activity Requirements <input checked="" type="checkbox"/> Community Services Activity Requirements <input type="checkbox"/> Land-use and Forests Activity Requirements <input type="checkbox"/> 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.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Reference number	DEVRQ-97, DEVRQ-221		
Status of the deviation	<input checked="" 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 checked="" 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	Gold Standard Principles and Requirements; CDM Methodological Tool “Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period”
	Version	version 2.1, version 03.0.1
	Paragraph	Paragraph 2.1.1 (P&R)

## 6.2 | Description of the deviation

<b>Title</b> Request for Deviation from Planned Baseline data collection due to Conflict Zone Risks – VPA GS11433		
Confirm the nature of changes related to deviation	<input checked="" type="checkbox"/> <b>Temporary</b> (e.g. not expected to occur beyond one monitoring period)	<input type="checkbox"/> <b>Permanent</b> (e.g. deviation from requirements prior to submission for certification)
	Temporary deviation for Renewal of crediting period	
Relevant monitoring period, if applicable	Start date	$dd/mm/yyyy$
	End date	$dd/mm/yyyy$
Summarise the changes	<p>Given the scale and unpredictability of the conflict in eastern DRC, it is currently not feasible to ensure safe and reliable data collection exercises. BURN intended to conduct a baseline survey and Kitchen Performance Test (KPT) on baseline technology as part of the crediting period renewal process. However, citing the current unrest, this is not feasible.</p> <p>BURN respectfully requests Gold Standard's approval to suspend the baseline monitoring survey and KPT for the renewal of the crediting period and instead use the results of the baseline survey and KPT conducted at the time of validation of the VPA for ex-ante emission reduction estimation. BURN will conduct a new baseline survey and KPT once the security situation stabilizes, thereby prioritizing the safety of field personnel while upholding the environmental and developmental integrity of the project outcomes. The new baseline survey will be completed prior to the first verification of the next crediting period, and the updated results will be incorporated through an issuance track design change during the verification process.</p>	
<b>Deviation Basis</b> <ol style="list-style-type: none"> <li>Applicable Gold Standard Provisions:            Paragraph 2.1.1 of Annex B of the <i>Gold Standard Principles and Requirements, Version 2.1</i> provides for deviations where projects are located in conflict zones or areas that pose high risk to life. These provisions are designed to address cases where developers face barriers in engaging VVBs to conduct validation or verification. In such circumstances, desk-based assessments may be combined with on-site checks by an Objective Observer retained by the developer. However, the Principles and Requirements do not provide specific guidance for situations in which Baseline surveys themselves—whether remote or in-person—cannot be implemented due to severe conflict.         </li> <li>Alignment with CDM Guidelines            In accordance with the CDM Methodological Tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period", version 03.0.1, BURN has assessed the continued validity of the existing baseline through the following steps:         </li> </ol>		

<ul style="list-style-type: none"> <li>• Step 1.1: Assess compliance of the current baseline with relevant mandatory national and/or sectoral policies.</li> </ul> <p>There are no national or sectoral policies mandating the use of improved cookstoves in DRC. Traditional charcoal stoves remain the dominant cooking technology.</p> <ul style="list-style-type: none"> <li>• Step 1.2: Assess the impact of circumstances</li> </ul> <p>There has been no change in baseline cooking technology since validation. Publicly available literature confirms that charcoal stoves continue to be predominantly used in households.</p> <ul style="list-style-type: none"> <li>• Step 1.3: Assess whether the continuation of use of current baseline equipment(s) or an investment is the most likely scenario for the crediting period for which renewal is requested.</li> </ul> <p>The improved stoves distributed under this project will continue using for next crediting period.</p> <ul style="list-style-type: none"> <li>• Step 1.4: Assessment of the validity of the data and parameters</li> </ul> <p>Ex-ante parameters can be assessed without requiring on-site baseline surveys at this time. The existing baseline remains valid for emission reduction estimation.</p> <p>Therefore, re-assessment of the baseline is not required for renewal of crediting period.</p>	<p><b>Conflict Escalation in Eastern DRC</b></p> <p>The security situation in North and South Kivu has deteriorated sharply in 2025, rendering monitoring infeasible. BURN has historically conducted surveys in Goma and Bukavu through a combination of in-person and remote monitoring; however, the intensity of the current conflict has made both approaches impossible.</p> <p>Whereas this region has not been without pockets of volatile conflicts, BURN had always been able to send enumerators to conduct monitoring surveys or pursue alternatives such as remote monitoring for the last three monitoring periods against which we have successfully completed monitoring and verification. However, the conflict in 2025 has seen an explosion in violence which has paralyzed operations in the region at an unprecedented pace and ferocity. The circumstances are extraneous, as the escalation in conflict is centered on a confluence of internal and external geo-political tensions that have been haltered by the lack of any political or expedient resolutions. More than 8 million people have been displaced because of the on-going conflict, with 3.8 million people displaced from North and South Kivu provinces in the east of the country.</p> <p>The violence in 2025 has largely been driven by armed groups, particularly M23 rebels, who have intensified their offensive in eastern DRC.</p> <p>Recent escalations include:</p>
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- **27 January 2025** – M23 forces captured Goma, displacing more than 2 million people.
- **16 February 2025** – Bukavu was seized, further expanding the conflict into South Kivu.
- **19 March 2025** – Walikale, a mining hub in North Kivu, was taken, marking the farthest westward advance by M23.
- **9–21 July 2025** – OHCHR reported at least 319 civilian deaths in North Kivu during this period.
- **22 August 2025** – The UN Security Council convened an emergency meeting in response to a surge of armed group attacks.
- **27–29 September 2025** – Armed clashes intensified between FARDC, local militia ("Wazalendo") and M23, including drone airstrikes on Nzibira.

The presence of multiple armed actors has created a highly insecure operating environment, with widespread displacement, human rights violations, and restricted access to transport infrastructure. Peace negotiations have repeatedly collapsed, and there is no credible expectation of near-term stabilization.

### **Proposed Deviation**

In line with the CDM guidelines referenced above, re-assessment and updating of the baseline technology is not required for renewal of the crediting period. However, BURN remains committed to conducting this re-assessment to ensure the reliability and accuracy of data. BURN respectfully requests approval to suspend the repeat baseline survey and KPT for the renewal of the crediting period of VPA Gold Standard GS11433 and to use the results of the baseline survey and KPT conducted at the time of validation of the VPA for ex-ante emission reduction estimation. A new baseline survey and KPT will be conducted once the security situation stabilizes, ensuring methodological rigor and personnel safety while maintaining the environmental integrity of the project. This temporary allowance will allow us to mitigate the risk of losing certifying period timelines associated with a delayed validation of the RCP owing to the ongoing and unpredictable political situation. We will, however, ensure that complete Baseline survey and KPT are conducted once the security situation normalizes. The new baseline survey will be completed prior to the first verification of the next crediting period, and the updated results will be incorporated through an issuance track design change during the verification process.

### **Safeguards and Integrity**

The proposed deviation upholds Gold Standard principles:

- **Environmental integrity:** Conservative adjustments prevent over-crediting.
- **SDG contributions:** The project continues to deliver health, economic, and environmental benefits in line with GS4GG requirements.

	<ul style="list-style-type: none"> <li>• <b>Safeguarding Principles:</b> The assessment remains valid and is not compromised.</li> <li>• <b>Host country compliance:</b> The deviation does not conflict with DRC regulatory requirements.</li> </ul>						
Reason for deviation	BURN is requesting this deviation with respect to the planned baseline exercise for the VPA, which is situated in a conflict zone where significant security risks prevent safe access for on-site surveys.						
Proposed resolution	BURN would like to request that the on-site baseline survey & KPT be postponed and use the results of the baseline survey and KPT conducted at the time of validation of the VPA, for ex-ante emission reduction estimation, in order to ensure both the safety of personnel and the integrity of reported emission reductions.						
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  <input type="checkbox"/> Local stakeholder consultation  <input type="checkbox"/> Safeguarding principles  <input checked="" type="checkbox"/> SDG assessment  <input type="checkbox"/> Regulatory compliance  <input type="checkbox"/> Additionality  <input type="checkbox"/> Applicability of methodology  <input checked="" type="checkbox"/> Annual emission reduction volume (<i>if yes, fill the table below</i>)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Annual emission reduction/ removal before applying deviation</td> <td style="width: 50%;">Annual emission reduction/ removal after applying deviation</td> </tr> <tr> <td>XYZ tCO<sub>2</sub>e</td> <td>XYZ tCO<sub>2</sub>e</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> any other matrix, please specify...</td> </tr> </table>	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	<input type="checkbox"/> any other matrix, please specify...	
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						
<input type="checkbox"/> any other matrix, please specify...							
Summary of the impact	Estimated annual emission reduction may change based on the baseline fuel consumption monitored during baseline KPT.						
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 <u>Deviations Request Requirements and Procedures</u> or request is submitted by the VVB.</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><i>If answer is yes, fill the information in section 6.4 below.</i></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	
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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.*)

### REPORTS ON ARMED CONFLICT IN DRC

1. Africa Center for Strategic Studies. (2025, June). *The DRC conflict enters a dangerous phase: Risks of a repeat of the second Congo war.* <https://africacenter.org/wp-content/uploads/2025/06/DRC-Conflict-Enters-Dangerous-Phase.pdf>
2. Al Jazeera. (2025, March 24). *Mapping the human toll of the conflict in DR Congo.* <https://www.aljazeera.com/news/2025/3/24/mapping-the-human-toll-of-the-conflict-in-dr-congo>
3. Al Jazeera. (2025, September 5). *UN suspects all sides in DR Congo conflict guilty of war crimes.* <https://www.aljazeera.com/news/2025/9/5/un-suspects-all-sides-in-dr-congo-conflict-guilty-of-war-crimes>
4. Council on Foreign Relations. (2025). *Violence in the Democratic Republic of Congo.* Global Conflict Tracker. <https://www.cfr.org/global-conflict-tracker/conflict/violence-democratic-republic-congo>
5. Critical Threats Project. (2025, September 29). *Congo war security review.* <https://www.criticalthreats.org/briefs/congo-war-security-review>
6. Médecins Sans Frontières. (n.d.). *Conflict in DR Congo: What's happening and how to help.* Doctors Without Borders. <https://www.doctorswithoutborders.org/latest/conflict-dr-congo-whats-happening-how-help>

7. ReliefWeb. (2025, September 21). *Eastern DRC situation regional external update, 21–08 September 2025*. <https://reliefweb.int/report/democratic-republic-congo/eastern-drc-situation-regional-external-update-21-08-september-2025>
8. Security Council Report. (2025, September 18). *Democratic Republic of the Congo: Briefing and consultations*. What's in Blue. <https://www.securitycouncilreport.org/whatsinblue/2025/09/democratic-republic-of-the-congo-briefing-and-consultations-18.php>
9. Security Council Report. (2025, September). *Democratic Republic of the Congo: Monthly forecast*. <https://www.securitycouncilreport.org/monthly-forecast/2025-09/democratic-republic-of-the-congo-31.php>
10. United Nations. (2025, August 15). *Continued attacks by armed militia in Eastern DRC persist despite UN intervention calls*. UN News. <https://news.un.org/en/story/2025/08/1165586>
11. United Nations. (2025). *Report on efforts toward a political solution in the Democratic Republic of Congo*. [Exact URL/details pending].
12. ACAPS. (2025). *Democratic Republic of Congo: Country humanitarian analysis*. <https://www.acaps.org/en/countries/drc>

## 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