**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

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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

# 4| Decision summary

## 4.1 | General information

| DEVIATION REFERENCE NUMBER | DEVRQ-255 |
|---|---|
| Date of decision | 09/12/2025 |
| Decision | ☐ **Approved** [No precondition to apply the deviation decision]<br><br>☐ **Conditionally approved** [Decision is subject to compliance with the precondition defined below]<br><br>☒ **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 Coordinating and Managing Entity (CME) has not provided sufficient evidence to demonstrate that the renewal activities—such as baseline reassessment and preparation for the Validation and Verification Body (VVB) site visit—were initiated prior to the end date of the previous crediting period. Furthermore, the CME has not established that these activities were interrupted solely due to the cited events occurring at the close of the previous crediting period, nor that such events had a direct and unavoidable impact on the renewal process.

With respect to the proposed methodology change, the CME is required to follow the Design Change Request Requirements and Procedures rather than seeking approval through the deviation process.

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

N/A

### 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<br>☒ No |
| Does this decision set a precedent for future projects with similar circumstances?[2] | ☐ Yes<br>☒ No |

Precedent details (if applicable to other activities)

NA

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[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] : | Tushar Kanti Saha |
| Email ID[4] : | tushar@ccdbbd.org |
| Organisation:[5]: | CCDB Enterprise Ltd. |
| Are you an authorized project participant as per the cover letter submitted for this activity? | ☒ Yes<br>☐ No |

## 5.3 | Background information

| Type | ☐ Project activity | ☒ PoA | ☒ VPA |
|---|---|---|---|
| GS ID | | GS 7443 | GS 7444 |
| Host country(ies) | Bangladesh | | |
| Project Title | Carbon Emission Reduction Program through CCDB Improved Cook Stove (ICS) in Bangladesh | | |
| Registry link | **https://registry.goldstandard.org/projects/details/1658** | | |
| Scale | ☒ Microscale (GS)<br>☐ Small scale<br>☐ Large scale<br>☐ Other, if applicable please specify below<br>*Insert text here* | | |

| Certification Status and corresponding | ☐ Listed | ☐ Certified design | ☐ Certified project | ☒ Other |
|---|---|---|---|---|

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[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 | | | | *Renewal of Crediting Period* |
|---|---|---|---|---|
| | *dd/mm/yyyy* | *dd/mm/yyyy* | *dd/mm/yyyy* | *dd/mm/yyyy* |

| 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 |
| | *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. | | ☐ Yes ☒ No | |
|---|---|---|---|
| Reference number | Insert Text here | | |
| 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** *Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number* | | |

# 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 | Version number V2.1 |
| | Paragraph | Paragraph number, para 5.1.45 |

## 6.2 | Description of the deviation

| | |
|---|---|
| Title | Renewal of Crediting Period from the last date of first crediting cycle |
| 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 | This deviation request is being submitted for the Programme of Activities (PoA) GS 7443 and its first real case VPA GS7444 to address missed crediting period renewal deadline. The first crediting period for the projects ended on 14/01/2024, and according to Paragraph 5.1.45 of the Gold Standards Principles and Requirements (v2.1), the renewal application should have been submitted no later than the last date of current certification cycle. |

CCDB requests a deviation for the delayed renewal application, which was a direct consequence of unforeseen and severe internal country riots, climatic event and widespread social instability (described below in reason for deviation section). These extraordinary circumstances, which were beyond internal control, significantly disrupted the movement in the field, making it impossible to meet the submission deadline. We therefore request that the new crediting period for the PoA and its first real case VPA be permitted to start on 15/01/2024 to avoid any adverse effects on the project from these unavoidable delays.

Additionally, in accordance with paragraph 3.6 of the Design Change Request and Requirement Procedure (v2.0), CCDB is also requesting a deviation to revise the applied methodology. The request is to update the methodology from the "Gold Standard Simplified Methodology for Clean and Efficient cookstove version 1.0" to the CORSIA eligible "Technology and Practices to Displace Decentralized use of Thermal Energy (TPDDTEC) version 04.0."

CCDB confirms that this deviation adheres to all core Gold Standard principles,
- Environmental Integrity: no over-estimation of GSVERs
- Contribution to Sustainable Development Goals (SDGs): no compromise to SDG contributions
- Safeguarding Principles and requirements: continued adherence to Safeguarding Principles
- Compliance with host country regulation: no conflict with host country regulations

| | |
|---|---|
| Reason for deviation | The delay in submitting the crediting period renewal application was a direct consequence of three distinct, successive, and unavoidable national crises in Bangladesh. These compounding events, which were |

extraordinary circumstances beyond CCDB's control, created national paralysis, making it impossible to adhere to procedural timelines.

The first crisis was the intense political unrest surrounding the January 2024 national election. The period from the last quarter of 2023 through January 2024 was marked by nationwide strikes (hartals), transport blockades, and widespread political violence as the main opposition parties boycotted the election (VOA News, 2024). This resulted in logistical chaos, shutdown of services, and a climate of fear, severely hampering the project team's mobility and ability to conduct normal work.

Second, as the situation began to normalize, the southern coast was struck by Cyclone Remal in late May 2024. Classified as the most devastating cyclone to hit the region in years, Remal affected over 4.5 million people and caused catastrophic infrastructure damage (ACAPS, 2024). The storm's aftermath saw nearly 17 million people without power and 20,000 mobile/cell towers out of service, severing communication and transport links (UN Bangladesh, 2024). Since this project is also implemented in one of the coastal subdistricts, the project area also faced the devastating effect of cyclone. This natural disaster forced a nationwide shift in focus to emergency response and humanitarian aid, further diverting resources and halting processes, including those for the project.

Finally, before operations could fully recover, the country faced unprecedented civil unrest starting in July 2024. What began as student-led protests for quota reform escalated into a nationwide mass uprising (The Diplomat, 2024). This period was characterized by a "non-cooperation movement" that led to a complete shutdown of government offices, banks, and all transport services. The government imposed nationwide curfews and a country-wide internet and mobile network blackout, effectively isolating the country and making digital or physical work impossible (Al Jazeera, 2024). This crisis culminated in the resignation of the government on August 5, 2024, creating a power vacuum and a period of profound administrative uncertainty.

While an interim government led by Dr. Muhammad Yunus was formed on August 8, 2024 (VOA News, 2024), this transition did not immediately restore normalcy. The power vacuum led to a temporary collapse of the national law enforcement and administrative structures. The police force was largely absent from the streets, resulting in a severe security vacuum, widespread public disorder, and incidents of looting (RSIS, 2024). This ongoing state of administrative paralysis and insecurity made it impossible to resume normal operations or complete complex administrative tasks like the renewal application.

This compounding series of political, natural, and civil crises created an impossible operating environment. The project team was unable to conduct necessary activities or submit documentation due to the

| | |
|---|---|
| | complete and recurring breakdown of national infrastructure, communications, transport, and government services.<br><br>** Please see the Annex 1 for Reference documents |
| Proposed resolution | CCDB requests approval for this deviation, which is essential for the project's continuation and integrity. We request that the second crediting period for the PoA (GS 7443) and its first real case VPA (GS7444) be permitted to start on 15 January 2024, ensuring the project's crediting period cycle continues without a gap despite the late submission. This back-dating is critical because the submission delay was a direct result of documented force majeure events, yet the project continued to fully operate and deliver real, verifiable emission reductions during this entire crisis period. Failure to approve this start date would create an unjust crediting gap, unfairly penalizing the project for circumstances completely beyond its control and jeopardizing its financial viability. Furthermore, we request permission to update the applied methodology to "Technology and Practices to Displace Decentralized use of Thermal Energy (TPDDTEC) version 04.0." This update is necessary to align the project with current, high-integrity international standards and ensure its long-term financial sustainability by securing access to critical carbon markets, including those requiring CORSIA eligibility. |
| Is there any potential temporary or permanent impact of deviation on other aspects of the project? | Select the relevant area:<br>☒ Project design<br>☐ Local stakeholder consultation<br>☐ Safeguarding principles<br>☐ SDG assessment<br>☐ Regulatory compliance<br>☐ Additionality<br>☒ Applicability of methodology<br>☐ Annual emission reduction volume *(if yes, fill the table below)*<br><br><table><tr><td>Annual emission reduction/removal before applying deviation</td><td>Annual emission reduction/ removal after applying deviation</td></tr><tr><td>*XYZ* tCO$_2$e</td><td>*XYZ* tCO$_2$e</td></tr></table><br>☐ any other matrix, please specify… |
| Summary of the impact | The impact would be on the design of the PoA and its VPA and it would be the result of update in the applied methodology. |
| Insert text here | |

## 6.3 | VVB information

| | |
|---|---|
| Is a VVB opinion on the deviation request required?<br>*VVB opinion shall be included, where required by the requirements under* <u>*Deviations Request Requirements and*</u> | Yes ☐ No ☐<br>*If answer is yes, fill the information in section 6.4 below.* |

| | |
|---|---|
| *Procedures or request is submitted by the VVB.* | |

## 6.4 | VVB's assessment

| | | | |
|---|---|---|---|
| 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.

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:<br><br>- date of listing, design certification, transition<br>- standard version<br>- specific reference to a requirement deviated from<br>- any previous deviations/design changes approved<br>- 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 |