



Gold Standard[®]
for the Global Goals

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](#)

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	5
5 Deviation Request Details.....	6
5.1 Submitted by.....	6
5.2 Details of the entity and its representative submitting the form	6
5.3 Background information.....	6
5.4 Project deviation history	7
6 Deviation detail	7
6.1 Standard document reference.....	7
6.2 Description of the deviation.....	7
6.3 VVB information.....	11
6.4 VVB’s assessment	11
6.5 Documents:	12

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-295
Date of decision	12/01/2026
Decision	<input type="checkbox"/> Approved [No precondition to apply the deviation decision] <input checked="" type="checkbox"/> Conditionally approved [Decision is subject to compliance with the precondition defined below] <input type="checkbox"/> Not approved [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

The deviation request for using the 2024 baseline data is approved with the condition that the baseline survey following the methodology requirement was conducted. The VVB shall validate during Design Change review.

Clarification by Gold Standard:

1. The CCP labelling is allowed for GSVERs that have not already been issued. The project developer shall refer to the requirement in paragraphs from 1.2.6 to 1.2.11 of the REQUIREMENTS: CORE CARBON PRINCIPLES LABELLING OF GOLD STANDARD VERIFIED EMISSION REDUCTIONS, version 3.0, dated 22/12/2025.
2. The design change review for the new baseline application will be conducted independently to the CP renewal as the scopes are different.
3. The project developer must follow the requirement from CCP labelling of GSVERs without deviation.

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

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

4.2.4 | Directions for the Gold Standard, if applicable

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

4.3 | Applicability to other activities

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

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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

5.3 | Background information

Type	<input checked="" type="checkbox"/> Project activity	<input type="checkbox"/> PoA GSXXXX	<input type="checkbox"/> VPA	
GS ID	GS5642 GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX	
Host country(ies)	The Republic of Kenya			
Project Title	Burn Stoves Project in Kenya			
Registry link	https://registry.goldstandard.org/projects/details/1559			
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 date of latest status	<input type="checkbox"/> Listed dd/mm/yyyy	<input type="checkbox"/> Certified design dd/mm/yyyy	<input checked="" type="checkbox"/> Certified project 31/10/2025	<input type="checkbox"/> 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	<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 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	
	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	REQUIREMENTS: CORE CARBON PRINCIPLES LABELLING OF GOLD STANDARD VERIFIED EMISSION REDUCTIONS
	Version	2.0
	Paragraph	6.1.4

6.2 | Description of the deviation

Title	Request for Deviation to Allow Use of 2024 Baseline Reassessment for CCP Labelling – Project 5642	
	<input type="checkbox"/> Temporary	<input checked="" type="checkbox"/> 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)
	The ex-post ER sheet will be updated for MP (13/03/2024 – 25/04/2024) using the latest baseline, and ex-post be remodeled for updating the PDD	
Relevant monitoring period, if applicable	Start date	13/03/2024
	End date	25/04/2024
Summarise the changes	<p>Background and Context</p> <p>Project 5642 is currently undergoing preparation of design change documents required for CCP labelling for the monitoring period 13 March 2024 – 25 April 2024, which was implemented under Gold Standard Methodology Version 3.1.</p> <p>During internal validation of CCP requirements, we identified that the project does not meet the provision requiring that “a reassessment of baseline emissions has been conducted at least once within the five years immediately preceding the start of an issued monitoring period.” Project 5642 operates under a 7-year renewable crediting period (RCP). The baseline emissions used for the current monitoring period were originally established in 2018, which places them outside the required 5-year window and therefore renders them ineligible for CCP labelling purposes.</p> <p>However, as part of the recent RCP renewal, BURN conducted comprehensive baseline surveys in 2024, following all applicable methodological and Gold Standard requirements. These baselines have already been reviewed and accepted during the RCP renewal process. To maintain methodological integrity while enabling CCP alignment, BURN hereby submits a deviation request to apply the 2024 baseline reassessment for CCP labelling for the referenced monitoring period.</p> <p>Deviation Basis</p> <p>1. Applicable Gold Standard Provisions</p> <p>CCP requirements under the Gold Standard for the Global Goals (GS4GG) specify that a baseline reassessment must be completed within the five-year period preceding the start of any monitoring period intended for CCP issuance.</p> <p>These provisions aim to ensure that:</p> <ul style="list-style-type: none"> • Baselines remain current and reflective of actual field conditions, • Emission reductions are estimated using the most recent baseline surveys, and • Methodological alignment with Gold Standard requirements are upheld. <p>The 2024 baseline surveys fully satisfy these objectives and provide an up-to-date and robust basis for quantifying emission reductions for the relevant monitoring period.</p> <p>2. Consistency With Methodological Guidance</p>	

Under standard practice, projects may update baseline parameters at renewal and use these values for subsequent monitoring periods, provided they have undergone appropriate assessment and approval. The baseline surveys conducted in 2024 were reviewed and approved during the RCP renewal, meaning their methodological validity and representativeness have already been confirmed.

Therefore, applying these baselines for both ex-post and ex-ante emission reduction (ER) quantification is methodologically sound and consistent with Gold Standard's approach to ensuring environmental integrity

Rationale for the Proposed Deviation

- The 2018 baselines fall outside the required 5-year CCP compliance window.
- The 2024 baselines were developed using updated field data and robust sampling methodologies.
- These baselines have already undergone Gold Standard review under the RCP renewal.
- Applying the 2024 ensures compliance without delaying the CCP process.

Proposed Deviation

BURN respectfully requests Gold Standard's authorization to:

1. Use the 2024 baseline surveys (approved during the RCP renewal) for quantifying both ex-post and ex-ante ERs for monitoring period 13/03/2024 – 25/04/2024, for the purpose of CCP labelling.
2. Incorporate the 2024 baselines into the updated PDD and Monitoring Report as part of the design change package for CCP.

Safeguards and Integrity

The proposed deviation fully upholds Gold Standard principles:

- **Environmental Integrity:** Using the more recent 2024 baseline ensures conservative ER estimates aligned with true field conditions.
- **Methodological Rigor:** The 2024 baseline has already undergone formal GS assessment during the RCP renewal process.
- **Transparency:** All revisions will be clearly documented in the MR and updated PDD.
- **No Risk of Over-Crediting:** Updated baselines ensure accuracy and representativeness.

Clarification Requested From Gold Standard

To proceed appropriately, we kindly request confirmation on the following points:

1. Is the proposed approach—using the 2024 baseline reassessment for CCP labelling acceptable even though the performance review for the monitoring period is already closed?
-

	<p>2. Will Gold Standard require any additional audits, validation, or verification of these 2024 baselines, beyond the review already completed during the RCP renewal?</p> <p>3. If the 2024 baselines are deemed inapplicable for the monitoring period, can Gold Standard permit a deviation from CCP requirements and allow the project to use the 2018 baseline for CCP labeling, given that the project has a 7-year crediting period?</p> <p>Conclusion</p> <p>In light of the above, BURN respectfully requests approval for this deviation to allow the use of the 2024 baseline reassessment for CCP labelling of Project 5642. This approach maintains full methodological integrity, aligns with CCP principles, and reflects the most accurate and conservative baseline conditions available.</p> <p>We remain available to provide any additional documentation, sampling files, or methodological justification to support Gold Standard’s review.</p>
Reason for deviation	<p>The CCP labelling requirements stipulate that a baseline reassessment must fall within five years prior to the start of the monitoring period. For Project 5642, the baselines used for the monitoring period 13 March 2024 – 25 April 2024 were originally established in 2018, making them ineligible under current CCP rules.</p> <p>However, during the recent renewal of the 5642-crediting period, comprehensive baseline surveys were conducted in 2024 and formally approved by Gold Standard. These updated baselines represent the most accurate and current data available.</p> <p>A deviation is therefore required to allow the use of the 2024 baseline reassessment—rather than the 2018 baseline which are ineligible as per CCP requirements—for CCP labelling, ensuring methodological accuracy and compliance without necessitating a new baseline study.</p>
Proposed resolution	<p>BURN proposes to apply the 2024 baseline reassessment—conducted and approved during the recent renewal of the Project 5642 crediting period—for the purpose of quantifying both ex-post and ex-ante emission reductions for the monitoring period 13 March 2024 – 25 April 2024 under CCP labelling.</p> <p>The 2024 baselines were developed using updated field data, robust sampling procedures, and all methodological requirements applicable under the Gold Standard for the Global Goals. Their application ensures that emissions calculations remain accurate, complete, and conservative, consistent with CCP rules requiring baselines to be reassessed within a five-year window.</p> <p>This proposed approach does not alter the monitoring methodology, parameters, or calculation structure. It solely updates the baseline dataset to reflect the most current and representative information already validated by Gold Standard during the RCP renewal process.</p>

	All supporting documentation—including baseline survey reports, sampling design, data collection tools, and RCP approval records—is already available to Gold Standard as part of the recent crediting period renewal submission and can be referenced to confirm full compliance with applicable requirements.				
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	<p>Select the relevant area:</p> <p><input checked="" type="checkbox"/> Project design</p> <p><input type="checkbox"/> Local stakeholder consultation</p> <p><input type="checkbox"/> Safeguarding principles</p> <p><input checked="" 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 checked="" type="checkbox"/> Annual emission reduction volume <i>(if yes, fill the table below)</i></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>15,973⁶ tCO₂e</td> <td>29,622⁷ tCO₂e</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	15,973 ⁶ tCO ₂ e	29,622 ⁷ tCO ₂ e
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				
15,973 ⁶ tCO ₂ e	29,622 ⁷ tCO ₂ e				
Summary of the impact	<p>Summary of the Impact</p> <p>The proposed deviation affects two key aspects of the project: SDG assessment (SDG 15) and annual emission reduction volumes, both of which rely on baseline fuel consumption values.</p> <p>Overall, the deviation improves accuracy, prevents over-crediting, and aligns monitoring results with the most current data available, thereby enhancing the reliability of both SDG and ER outcomes.</p>				

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> <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.

⁶ Ex-post CCP ERs achieved using old baselines CONFIDENTIAL 27th July GS5642 Kenya Ex Post ER calculations MPVICP2-AR Com

⁷ Ex-post CCP ERs achieved using new baselines ref CONFIDENTIAL 9th DEC GS5642 Kenya Ex Post ER calculations MPVICP2-AR Com

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. Er sheet ref Ex-post CCP ERs achieved using old baselines
CONFIDENTIAL 27th July GS5642 Kenya Ex Post ER calculations MPVICP2-AR Com
- Document 2. Er sheet ref Ex-post CCP ERs achieved using new baselines ref
CONFIDENTIAL 9th DEC GS5642 Kenya Ex Post ER calculations MPVICP2-AR Com

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"> - 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