



Gold Standard[®]
for the Global Goals

FORM

FORM - DEVIATION REQUEST SUBMISSION

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
- 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-304
Date of decision	23/03/2026
Decision	<input type="checkbox"/> Approved [No precondition to apply the deviation decision] <input type="checkbox"/> Conditionally approved [Decision is subject to compliance with the precondition defined below] <input checked="" type="checkbox"/> 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 project cannot claim credits beyond 2 years from the date of Project Design Certification.

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

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 : Kate Danter	Insert Text here
Email ID ⁴ : kate.danter@co2balance.com	Insert Text here
Organisation: ⁵ : CO2balance	Insert Text here
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	GS12639 GS12640 GS12641 GS12643	GS XXXX	GS XXXX GS XXXX
Host country(ies)	Malawi Uganda Zambia Tanzania		
Project Title	GS12639 - GS7591 VPA 62 Innovation: Africa Solar Water Pumping Projects – Uganda GS12640 - GS7591 VPA 63 Innovation: Africa Solar Water Pumping Projects – Malawi GS12641 - GS7591 VPA 64 Innovation: Africa Solar Water Pumping Projects - Zambia GS12643 - GS7591 VPA 66 Innovation: Africa Solar Water Pumping Projects - Tanzania		

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

Registry link				
Scale	<input type="checkbox"/> Microscale (GS) <input checked="" type="checkbox"/> Small scale <input 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 checked="" type="checkbox"/> Listed	<input type="checkbox"/> Certified design	<input type="checkbox"/> Certified project	<input type="checkbox"/> Other <i>If other, specify here</i>
	GS12639: 15/03/2024	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>
	GS12640: 15/03/2024			
	GS12641: 15/03/2024			
	GS12643: 15/03/2024			
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
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	<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	Principles and Requirements
	Version	2.1
	Paragraph	5.1.37

6.2 | Description of the deviation

Title	Extended period of retroactive certification from original start dates	
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)
	This is a one-time deviation, but its impact would be permanent as it is relevant to the start of the project lifetime.	
Relevant monitoring period, if applicable	Start date	23/04/2023 – GS12639 19/04/2023 – GS12640 30/04/2023 – GS12641 15/04/2023 – GS12643
	End date	22/04/2025 – GS12639 18/04/2025 – GS12640 29/04/2025 – GS12641 14/04/2025 – GS12643
Summarise the changes	<p>Paragraph 5.1.37 of v2.1 the Principles and Requirements states “<i>The project may take into account retroactive period for performance Certification of Certified Impact Statement and /or Products. The maximum period for Retroactive Certification is two years prior to the date of Project Design Certification</i>”</p> <p>The projects followed all other required certification timelines as stated in Principles and Requirements v2.1, but were unable to achieve Design Certification in the required timeframe for full retroactive certification from their respective start dates. The proposition is to</p>	

	<p>enable the project to retroactively certify VERs from their original start date, using conservative values in calculations.</p>
<p>Reason for deviation</p>	<p>Significant delays in the validation review of the project have resulted in the date of design certification being over two years from the start date of the projects.</p> <p>All other time-specific timelines in Principles and Requirements v2.1 were adhered to:</p> <p><i>5.1.1.b Projects may then seek Gold Standard Certified Design status by successfully completing Validation (within two years of the date of Listing) and a subsequent Design Review.</i></p> <p><i>5.1.16 The Project shall complete Validation (defined as the date of submission of Validation Report by the VVB) within two years of successful listing of the project.</i></p> <p><i>5.1.51 Retroactive Projects shall submit for Preliminary Review within one year of the Project Start Date.</i></p> <p><i>4.1.50b Regular or Retroactive project cycle - both VPA types, with a project start date before or after the time of first submission of the PoA must submit the required documents for preliminary review within one year of its start date.</i></p> <p>The required documents were submitted to the chosen VVB for validation in September & October 2024. Given the proposed start dates for these VPAs are in April 2023, this submission date accounted for between 7-8 months for each project to complete validation and submit for Design Review. This would have enabled the projects to comply with 5.1.37 of the Principles and Requirements and retroactively certify two years prior to the date of Project Design Certification, as this date is 4 weeks from the time of submission to Gold Standard for Design Review.</p> <p>However, significant delays have occurred in the Validation stage of the project which severely prolonged the submission of the projects for Design Review. VVB review timelines have significantly extended since 2024, causing requirements such as 5.1.37 to be taken out of the control of the Project Developer.</p> <p>This rule is designed to prevent projects taking advantage of extended periods of time prior to Design Certification using outdated methodologies and requirements. However, all projects will be applying the most conservative values for the entire period of retroactive certification; CDM default fNRB values are applied and the most up-to-date methodology ERSDWS v1 is applied. Hence, all VERs issued from the start date of the project are using conservative calculations, unlike the majority of comparable VERs from those vintages issued from other projects.</p>

	<p>There have always been considerable efforts to continue the project, with methodological monitoring activities being conducted on all projects despite the validation review not being completed. This demonstrates that the project developer and implementer have intended to validate the project and conduct verification in a timely manner, to adhere to GS timelines where possible.</p> <p>The project has experienced a significant number of challenges during its implementation stage, which have been out of the PD's control. This includes major changes in the carbon market both nationally and internationally (fNRB defaults cutting forecasted credits, credit demand fluctuations, emerging in-country national Article 6 requirements).</p> <p>Furthermore, the project implementer operates in a country which has experienced extreme conflict since late 2023, shortly after the project initiation stage began. They have faced major challenges as an organisation, yet, they have continued to invest resources into the carbon project to ensure that project communities receive the support as intended from the beginning of the project. These additional aspects should be reasonably considered when assessing this deviation request.</p> <p>The challenges outlined above which have caused unavoidable delays in completing validation of the projects should not limit the length of time the project can retroactively claim certification for, particularly as these projects have demonstrated clear progress in complying with other Project Cycle requirements, conducted relevant monitoring, and attempted to comply with 5.1.37 from their inception.</p>
<p>Proposed resolution</p>	<p><i>Describe the proposed resolution for example proposed alternative monitoring arrangements for the non-conforming monitoring period.</i></p> <p><i>Describe how proposed resolution complies with the related requirements, where applicable, the accuracy, completeness and conservativeness is ensured.</i></p> <p><i>Please include all relevant information in support of the request.</i></p> <p>All projects are expected to achieve a date of Design Certification by 01/02/2026 following imminent submission for Design Review; however, this would only enable retroactive certification from 01/02/2024, despite the required activities being completed on the projects from their original start dates (the date of the first water system installation).</p> <p>The proposed resolution is for all projects to retroactively certify from their proposed start dates, as outlined in the current versions of their VPA Design Documents.</p>

For reference, this would result in the respective crediting periods below, starting from the **bold** dates:

23/04/2023 - 22/04/2028: GS12639

19/04/2023 - 18/04/2028: GS12640

30/04/2023 - 29/04/2028: GS12641

15/04/2023 - 14/04/2028: GS12643

These start dates were expected to comply with requirement 5.1.37 given the amount of time between submission and the required deadline for retroactive certification.

These dates are the original start dates at the time of validation submission. The extended VVB review, due to the factors raised above, should not affect the period of retroactive certification in this case; if the review had been completed over a standard timeline, which was the expectation, these dates would be applicable for retroactive certification.

Conservativeness is not compromised during this period of certification. As stated in the previous section, all VERs issued in these periods will be implementing CDM default fNRB values, using the most up-to-date version of the methodology, and hence there is no chance of over crediting. As stated in section 2.2 of 'fNRB Application for GS4GG Certification', if the projects had been submitted for Design Certification prior to 30/06/2025 (which was originally anticipated to be achieved), they would be eligible for using calculated fNRB values for the proposed start dates to 31/12/2025; as this date for Design Certification is later, the result is a far greater level of conservativeness in calculations. The vast majority of VERs issued by similar community projects for these vintages (2023-2025) will be using calculated fNRB values, whereas these projects will be using conservative calculations.

There is no negative impact to the accuracy of the projects. The delayed review timelines and later-than-expected submissions for Design Certification do not reduce accuracy within the projects.

The project complies with the other stated deadlines in the Principles and Requirements, demonstrating attempts to implement the projects from their stated start dates. This proves completeness of the project for all other aspects.

The proposed retroactive certification period does not risk over crediting, applies conservative values for the entire crediting period, and through demonstrable efforts to achieve all timelines within the project cycle, should not be negatively impacted by delayed VVB validation reviews.

<p>Is there any potential temporary or permanent impact of deviation on other aspects of the project?</p>	<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 <i>(if yes, fill the table below)</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #00a6c9; color: white;"> <th style="width: 50%;">Annual emission reduction/removal before applying deviation</th> <th style="width: 50%;">Annual emission reduction/removal after applying deviation</th> </tr> </thead> <tbody> <tr> <td>XYZ tCO_{2e}</td> <td>XYZ tCO_{2e}</td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table> <p><input checked="" type="checkbox"/> any other matrix, please specify... applicability of Principles and Requirements</p>	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO _{2e}	XYZ tCO _{2e}		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
XYZ tCO _{2e}	XYZ tCO _{2e}						
<p>Summary of the impact</p>	<p>Describe the impact of the deviation on each relevant aspect of the project as selected above. Please substantiate the impact assessment with relevant and verifiable data/information.</p>						

There is no impact from the deviation on the above aspects, or proposed emission reductions. The only impact would be for the start date of each VPA to remain at their originally planned dates.

6.3 | VVB information

<p>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></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	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.

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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