

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-334
Date of decision	16/06/2026
Decision	☐ Approved [No precondition to apply the deviation decision] ☐ Conditionally approved [Decision is subject to compliance with the precondition defined below] ☒ Not approved [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

The request does not tantamount to a deviation from GS4GG requirements.

As per Land-use & Forests Activity Requirements, retroactive forestry projects (projects where the stakeholder consultation is conducted after the project start date) can submit the required documentation within five years of the start date of the project.

As per the [Stakeholder Consultation and Engagement Requirements](#), if the stakeholder consultation is carried out after the project start date, the project developer shall provide clarification in the [Stakeholder Consultation Report](#) on why the stakeholder consultation was not conducted before the project start date, and provide explanation of how the comments received during the consultation were taken into account in the design and implementation of the project.

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

-

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

-

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? ¹	☐ Yes ☒ No
Does this decision set a precedent for future projects with similar circumstances? ²	☐ Yes ☒ No
Precedent details (if applicable to other activities)	

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 :	Dr Éamonn Coyne
Email ID ⁴ :	info@wellsforzoe.org
Organisation: ⁵ :	The Wells for Zoë Association
Are you an authorized project participant as per the cover letter submitted for this activity?	☒ Yes ☐ No

5.3 | Background information

Type	☐ Project activity	☐ PoA GSXXXX	☐ VPA
GS ID	GSXXXX GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Malawi		
Project Title	Wells for Zoë Carbon Project		
Registry link	N/A		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding date of latest status	☐ Listed <i>dd/mm/yyyy</i>	☐ Certified design <i>dd/mm/yyyy</i>	☐ Certified project <i>dd/mm/yyyy</i>
			☒ Other <i>Under Development</i> <i>dd/mm/yyyy</i>

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	☒ GS4GG			
	☐ Previous version of Gold Standard	Version no.		
		☐ 1.0	☐ 1.1	☐ 1.2
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 <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.			☐ 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 <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	V2.1
	Paragraph	Paragraph 4.1.28 and 5.1.51

6.2 | Description of the deviation

Title	Delayed submission of preliminary review documentation and completion of stakeholder consultation.	
	☐ Temporary	☒ 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)
Relevant monitoring period, if applicable	Start date	Dd/mm/yyyy
	End date	Dd/mm/yyyy
Summarise the changes	Two deviations to the requirements defined in the Gold Standard's "Principles and Requirements" are requested. First, the ability to conduct a stakeholder engagement process that complies with the Gold Standard requirements after the project start date. As described below, Wells for Zoë (WfZ) has been working in Malawi for 20 years and has strong, long-term relationships with communities and traditional leadership across the landscapes where AR activities are planned. Although substantial engagement was held with parties before the establishment of nurseries and planting of trees, it does not comply with the process defined by the Gold Standard. A deviation is requested to complete an engagement process that is compliant with the requirements of the Standard as early as possible in 2026. Second, to submit the documentation required for Preliminary Review by the Gold Standard more than a year after the start date of the project. Due to uncertainties associated with the enactment of the Malawi Carbon Market Framework, it is unclear at this point in time if project proponents are permitted to submit any project documentation to international carbon standards without the express permission of the Malawi government. Whereas WfZ is doing its utmost to secure clarification, this is causing a delay in the submission of documentation required for the Preliminary Review. A deviation from this requirement is therefore requested.	
Reason for deviation	Wells for Zoë (WfZ), a voluntary organisation founded in 2005, is dedicated to improving the lives of people in rural communities in Malawi through numerous interventions. Its focus to date is providing access to clean, safe drinking water and supporting clinics that provide essential care and education on nutrition, family planning, and disease prevention. Building on its established relationships with local communities, WfZ has expanded its activities to promote sustainable land-use practices, including sustainable agriculture, agroforestry, and landscape restoration. Over the past few years, the organisation has pioneered Afforestation and Reforestation (AR) activities in central and northern Malawi, aiming to rehabilitate degraded woodlands and restore soil health while equipping communities	

	with the knowledge and skills to manage their land sustainably over time. Since January 2025, WfZ has established a formal AR project aimed at obtaining verification under the Gold Standard. The project is funded by entities that require tree planting to begin as soon as possible, so participating communities can receive carbon revenues and see 'proof of concept' as soon as possible. Activities on the ground began in January 2025, and only thereafter did WfZ realise that the Gold Standard required a formal two-step stakeholder consultation process. While priority has been on implementing in partnership with communities with which WfZ has a long-standing working relationship, a commissioned review of the Gold Standards requirements was made in the second half of 2025, and a stakeholder engagement compliant with the Gold Standard can only be done in early 2026. The second deviation request, to submit the documents required for preliminary review more than a year after the project start date, is due to uncertainties regarding the newly enacted Malawi Carbon Market Framework, specifically with respect to clarification on whether formal documentation may be submitted to an international carbon standard prior to the issuance of a letter of no objection by the Government of Malawi. Whereas the project has submitted a Mitigation Activity Idea Note (MAIN) to the Malawi Government, due to elections in late 2025 and the protracted development of internal processes and capacity to enact the Framework, the Environmental Affairs Department has not clarified if Voluntary Carbon Market projects are permitted to submit documentation to international carbon standards without a formal letter of no objection, as well as the period of time it may take to secure such a letter.
Proposed resolution	First, with respect to the timing of a stakeholder engagement process that complies with the Gold Standard requirements, the project requests a deviation to complete it within 18 months of the project start date. However, it should be reiterated that extensive engagement was held before the start date, it just does not comply with the process required by the Gold Standard. Second, to submit the documentation required for Preliminary Review by the Gold Standard more than a year after the start date of the project. As soon as the Malawi Government provides clarification to project proponents on the time required to obtain a letter of no objection and permission to submit documentation

	to an international carbon standard, WfZ will be able to submit the documentation necessary for the Preliminary Review.						
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	Select the relevant area: ☐ Project design ☒ Local stakeholder consultation ☐ Safeguarding principles ☐ SDG assessment ☐ Regulatory compliance ☐ Additionality ☐ Applicability of methodology ☐ Annual emission reduction volume <i>(if yes, fill the table below)</i> <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 tCO₂e</td><td>XYZ tCO₂e</td></tr> <tr> <td></td><td></td></tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO ₂ e	XYZ tCO ₂ e		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
XYZ tCO ₂ e	XYZ tCO ₂ e						
Summary of the impact							
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 ☐ No ☒ <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.		
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. Mitigation Activity Idea Note (MAIN)

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: - 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