

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

The Gold Standard Foundation
International Environment House 2
Chemin de Ballexert 7-9
1219 Châtelaine Geneva, Switzerland
Tel +41 22 788 70 80
Email help@goldstandard.org

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	4
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	8
6.3 VVB information.....	10
6.4 VVB's assessment	10
6.5 Documents:	10

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-335
Date of decision	15/05/2026
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 deviation is approved. [LUF Activity Requirements](#) (para. 3.1.12), requires a performance review at least once within a five-year certification cycle. Where these requirements from [LUF Activity Requirements](#) apply, projects are allowed to deviate from the mandatory three-year follow-up site visits prescribed by the [RULE UPDATE-Applicability of minimum site visit requirements by VVB](#).

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

While the justification provided in the request has been noted, the approval is not based on the rationale of force majeure provided by the PD, as the standard issuance procedures are found to have been appropriately adhered to. The approval is granted in line with applicable Gold Standard requirements, also drawing on precedents where similar deviations have been accommodated for LUF activities.

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

None

4.2.4 | Directions for the Gold Standard, if applicable

None

4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances? ¹	☒ Yes ☐ No
---	--

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.

Does this decision set a precedent for future projects with similar circumstances? ²	☒ Yes ☐ No
---	---

Precedent details (if applicable to other activities)

Pursuant to the [LUF Activity Requirements](#) (para. 3.1.12), a performance review is required at least once within a five-year certification period. Where these requirements apply, the mandatory three-year follow-up site visits prescribed by the [RULE UPDATE- Applicability of minimum site visit requirements by VVB](#) may be waived.

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 :	Sneha Sukare
Email ID ⁴ :	Sneha SUKARE <ssukare@livelihoods-venture.com>
Organisation: ⁵ :	Livelihoods Fund SICAF SIV
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	GS6588 GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Kenya		
Project Title	Sustainable Agroforestry Based Dairy Value Chain in Mount Elgon, Kenya		
Registry link	https://registry.goldstandard.org/projects/details/1809		
Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding	☐ Listed	☐ Certified design	☒ Certified project ☐ Other <i>If other, specify here</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

date of latest status	dd/mm/yyyy	dd/mm/yyyy	26/10/2021	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	DEV_587
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 During the current performance review for the vintage 2021-2023, GS noted that RU-Applicability of minimum site visit requirements VVB have not been met.

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	RULE UPDATE-Applicability of minimum site visit requirements by VVB
	Version	RU_2021
	Paragraph	clause 2.2.3

6.2 | Description of the deviation

Title	Verification of monitoring period before three years of site visit date due to Force Majeure	
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	02/03/2021
	End date	01/03/2024
Summarise the changes	The Rule Update requires follow-up site visits by the VVB within three years of the previous site visit. The VVB site visit was carried out on 27/01/2025 – 04/02/2025 and the previous verification visit happened 01/11/2021 – 05/11/2021. This means that the Rule Update requirement was missed by a total of 2 months and 22 days. We request the change that the VVB may still verify the impacts of the full monitoring period. This change is temporary in nature as we plan to conduct the next site visit right after closure of this performance review round. So, there will be a next site visit roughly 1 year after the last one.	
Reason for deviation	The main reason for this deviation is based on Force Majeure that impacted the whole timeline of all project processes, which ultimately led to this delay of 2 months and 22 days. Force Majeure was mainly constituted in the COVID-19 pandemic and the Kenyan government restricting all contact for 1.5 years between March 2020 and October 2021⁶. This not only impacted the roll out and work of the projects (as shown in the first monitoring report) but also impacted the timeline of all project verifications. As shown above, verification site visit happened right after lifting this curfew in November 2021 – with the overall project timeline having suffered a loss of 6 months already. Another reason for delay, which was out of the hands of the project developer, happened during the issuance process. The process of issuance was prolonged by a misunderstanding in Gold Standard: In April 2024, we received news from GS that a 20% risk buffer would be applied to the verified credits. Although this was based on a misunderstanding (emission reductions do not face non-permanence risk) and subsequently resolved by GS, the preparation of argumentation that this risk buffer does not apply took time and effort. We had to revisit all available Gold Standard documentation (while also communicating with project stakeholders) in order to find the reasoning behind a 20% risk buffer deduction on emission reductions. In the end, this reason could not be found and we approached Gold	

⁶ <https://www.reuters.com/world/africa/kenyas-president-kenyatta-lifts-coronavirus-curfew-2021-10-20/>

	standard for a resolution. Resolution was quick but only enabled because all facts had been checked and prepared. This resolution email (containing personal information) is provided for review but should not be made public and is thus not included in section 6.5. Instead of April 2024, the credits were issued only by July 8, 2024 – roughly 3 months later than expected. Importantly, the first issuance of credits was the necessary step for the investor committee to release funds in order to start the next verification. Only after this issuance, could the compilation of the new monitoring report commence. When this was done, the VVB was contracted – already having passed the 3-year period after the last site visit by a few weeks. The VVB then needed time to prepare and organize the field visit. We believe as project developer, we did our best in order to comply with the organization of VVB site visits at minimum every three years. Much of these three years have passed with the verification process and within the sphere of our influence. However, events out of our control effectively stretched the timeline too much by an estimated 3 to 9 months. Therefore, we believe, it is adequate to deviate from the three year rule by 2 months and 22 days – much less than the time lost due to force majeure.				
Proposed resolution	The proposed resolution is that the VVB may still verify the full monitoring period. The affected monitoring period was subject to a change in monitoring, which has been demonstrated to be accurate, compete and conservative as described in the monitoring report.				
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> </tbody> </table> ☒ any other matrix, namely this deviation avoids the loss of 3736 tCO₂e (VERs) in the 2021 vintage.	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	The deviation will allow the VVB to verify the remaining 2 months and 22 days of the 2021 vintage. This deviation will therefore make a difference in ca 22.7% within the 2021 vintage (Volume of 3736				

	tCO2e). Other than that, this deviation does not impact any other aspect of the project.
--	--

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>
--	--

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.

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