

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.

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4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-347
Date of decision	17/05/2026
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 requests are concluded as below:

1. Deviation 1

The deviation request #1 is conditionally approved for the delay in submission for renewal of the PoA and VPAs. The CME is required to complete revalidation and submission of renewal requests within 6 months after the relevant PA-Aligned methodology is published.

The CME may claim the emission reduction using the methodology TPDDTEC 3.1 only until end of CP2 (29/07/2025). The monitoring period after 29/07/2025 must follow the approved methodology for CP3.

2. Deviation 2

Following the decision on the above deviation request #1, the water quality test shall follow the requirement in the applied methodology for the CP3. Given the fact that the PA Aligned methodology was not officially released, the specific exemption would be given once the PoA/VPAs get renewed and prior to the next monitoring period verification.

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

NA

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

NA

4.2.4 | Directions for the Gold Standard, if applicable

NA

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 :	Mr. Evan Haigler
Email ID ⁴ :	info@impactwater.co
Organisation: ⁵ :	Impact Water
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	GS2393 GS XXXX	GS 2296 GS XXXX
Host country(ies)	Uganda		
Project Title	Impact Carbon and myclimate Safe Water and Improved Cookstoves Global Programme of Activities		
Registry link	Link here		
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	24/08/2022	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	1. Requirements For Paris Agreement Alignment 2. Principles & Requirements
	Version	3. 1.0 4. 2.1
	Paragraph	5. Para 3.1.2 6. Para 5.1.45

7.

6.2 | Description of the deviation

Title	Temporary Deviation on Application of CP2 Documentation and Water Quality Testing Frequency for CP3 (30 July 2025 – 31 December 2025)	
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)
	Not expected to occur beyond one monitoring period	
Relevant monitoring period, if applicable	Start date	30/07/2025
	End date	31/12/2025
Summarise the changes	The CME requests a temporary procedural deviation to allow the continued application of the methodology and project documentation approved under CP2 of the concerned PoA and VPA. This includes the TPDDTEC v3.1 methodology applied during crediting period 2 (CP2: 30/07/2020 to 29/07/2025) and the corresponding approved PoA-DD and VPA-DDs. The requested deviation is limited to covering only the portion of the third crediting period (CP3: 30/07/2025 to 29/07/2030) that falls within calendar year 2025, i.e. 30 July 2025 to 31 December 2025, without proceeding at this stage with the inclusion and design certification of new small scale VPAs, originating from the defragmentation of large-scale VPA GS2296, (refer "GS2296_Defragmentation_Approval_to_Small_VPAs without the need of LSC 1" in section 6.5 below) , under a new methodology. Also, the deviation seeks approval to defer the PoA renewal and inclusion of the defragmented small-scale VPAs (originating from the defragmentation of large-scale VPA GS2296) and the associated design certification until a Paris Agreement (PA) aligned Safe Drinking Water methodology becomes available, after which a single design certification process would be undertaken for the remaining CP3 period (01 January 2026 – 29 July 2030).	
Reason for deviation	Deviation 1: The second crediting period (CP2) of PoA GS2393 and VPA GS2296 ended on 29 July 2025, and renewal was required by this date in accordance with para 5.1.45 of the Gold Standard Principles & Requirements. Based on clarification requests sought by the CME and subsequent discussions with Gold Standard, the CME was granted a three-month extension to the deadline for submission of the PoA renewal request. Accordingly, the PoA renewal request for CP3 was submitted within the extended deadline of 29 October 2025. In the same communication, Gold Standard approved the defragmentation of the large-scale VPA GS2296 into multiple small-scale VPAs, to be included under the renewed PoA at a later stage. Details of the above communication are provided in the email correspondence shared under Section 6.5, file titled	

"GS2296_Defragmentation_Approval_to_Small_VPAs without the need of LSC 1".

Subsequently, in December 2025, Gold Standard introduced the requirement that VERs claimed for vintage 2026 onwards must apply a PA-aligned methodology, implemented through a mandatory design change, in line with para 3.1.2 of the PA Alignment Requirements.

At the time of planning the PoA renewal and defragmentation of VPA GS2296, an applicable PA-aligned Safe Drinking Water methodology was not available; to date, only a draft methodology has been released for public consultation.

If the CME were to proceed at this stage with the inclusion and design certification of the defragmented VPAs, it would be required to apply the currently available non-PA-aligned Safe Drinking Water methodology in order to claim VERs for the portion of CP3 that falls within calendar year 2025 (i.e. 30/07/2025 to 31/12/2025). This approach would inevitably necessitate a second mandatory design change for the same defragmented VPAs (originating from the parent large-scale VPA GS2296) once the PA-aligned methodology is finalized, solely to comply with the PA-alignment requirement for VERs generated from 01 January 2026 onwards.

This would lead to duplicative design certification efforts (first design certification renewal and then design change), increased validation and administrative costs, inefficient use of resources and operational burden. The situation arises purely due to the timing of the PA-alignment requirements and the delayed availability of the PA-aligned methodology, which is outside the control of the CME.

Also, deferring all project activities until publication of the final PA-aligned methodology is not a feasible option for the CME. The project has existing delivery commitments for VERs corresponding to emission reductions generated during the 2025 calendar year, and an extended delay in progressing issuance would materially affect the CME's ability to meet these commitments.

Deviation 2: Conditional to approval of Deviation 1

Under TPDDTEC version 3.1, water quality testing is required to be conducted quarterly during the crediting period. The last WQT campaign under CP2 was conducted between 23 July 2025 and 06 August 2025. Accordingly, the subsequent quarterly WQT would have been due during November–December 2025.

However, at the end of CP2, VPA GS2296 was due for renewal, and based on discussions with Gold Standard, the VPA was approved for defragmentation into multiple small-scale VPAs. During this transition period, the applicable non-PA-aligned methodology for Safe Drinking Water projects was the *Methodology for Emission Reductions from Safe Drinking Water Supply*, under which water quality testing is required annually (as specified under Table SDWS 18).

	In parallel, Gold Standard introduced the requirement that VERs from 01 January 2026 onwards must apply a PA-aligned methodology, creating uncertainty regarding the applicable methodology and monitoring framework for CP3. As a result of these combined factors, the CME did not initiate a quarterly WQT campaign during November–December 2025 and instead planned to conduct water quality testing at the end of the monitoring period, consistent with the annual testing frequency prescribed under the currently applicable Safe Drinking Water methodology. If Gold Standard approves the application of CP2-approved documentation and methodology to the portion of CP3 falling within calendar year 2025, the CME acknowledges that the TPDDTEC v3.1 quarterly WQT requirement would apply to this period, resulting in a deviation due to the absence of a quarterly WQT campaign in November–December 2025.
Proposed resolution	Deviation 1: The Programme Participant therefore proposes that Gold Standard: • Allow the continued application of the methodology and project documentation approved under CP2 of the concerned PoA and VPA (i.e., the TPDDTEC v3.1 approach applied under crediting period 2 (CP2: 30/07/2020 to 29/07/2025) and corresponding VPA-DDs and PoA-DD) to be applied to the portion of CP3 falling in calendar year 2025, i.e. 30 July 2025 to 31 December 2025, without requiring immediate renewal, inclusion/ design certification of PoA and defragmented VPAs, under a new methodology. • Permit the deferral of PoA renewal and inclusion of the defragmented small-scale VPAs for CP3 until a final PA-aligned Safe Drinking Water methodology is available. and claim VERs only for the remaining portion of CP3 (excluding the portion of CP3 falling in calendar year 2025, for which VERs would be claimed using documentation approved under CP2), i.e. 01 January 2026 to 29 July 2030, in full compliance with para 3.1.2 of the PA Alignment Requirements. The PP confirms that no credits for vintages from 01 January 2026 onwards will be claimed without application of a PA-aligned methodology and completion of the required design change and design certification. Deviation 2: The CME therefore requests that Gold Standard: • Approve a temporary deviation from the TPDDTEC v3.1 quarterly water quality testing requirement for the monitoring period 30 July 2025 to 31 December 2025; and • Permit the CME to conduct water quality testing for this period in March–April 2026, applying sampling sizes, testing parameters, and procedures consistent with TPDDTEC v3.1, for the purpose of claiming VERs for the monitoring period 30 July 2025 – 31 December 2025.

	The CME confirms that this deviation is limited to the specified monitoring period, does not affect water quality testing requirements for subsequent periods.						
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	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.						
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.

File name: *GS2296_Defragmentation_Approval_to_Small_VPAs without the need of LSC 1*

Link: [GS2296_Defragmentation_Approval_to_Small_VPAs without the need of LSC 1.pdf](#)

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