

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	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.....	8
6.2 Description of the deviation.....	8
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	DEVREQ-350
Date of decision	10/03/2026
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 request is not approved. The VPAs shall not claim the emission reduction after the end of crediting period (CP) until they are renewed. Only once the CPs are renewed, the CME could monitor and verify the credits under the existing methodology (if renewed prior to the release date of the PA aligned methodology) or under the PA aligned methodology for the vintage prior to 01/01/2026 as mentioned in section 4.3.8.a of the P&R: Requirements for Paris Agreement Alignment, Version 1.0.

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

N/A

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

N/A

4.2.4 | Directions for the Gold Standard, if applicable

N/A

4.3 | Applicability to other activities

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

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

5.2 | Details of the entity and its representative submitting the form

Item	Information
Name ³ :	VV Krishnadas
Email ID ⁴ :	vv.krishnadas@orbenergy.com
Organisation: ⁵ :	Orb Energy
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 4289 GS XXXX	GS 5643 GS 7506 GS 7607 GS 10879
Host country(ies)	India		
Project Title	Orb Energy Solar Program in India		
Registry link	https://registry.goldstandard.org/projects/details/1349 https://registry.goldstandard.org/projects/details/1374 https://registry.goldstandard.org/projects/details/1914 https://registry.goldstandard.org/projects/details/1915 https://registry.goldstandard.org/projects/details/2836		

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

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	☐ Certified design	☒ Certified project	☐ Other <i>If other, specify here</i>
	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>	<i>12/02/2025</i>	<i>dd/mm/yyyy</i>
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		<i>dd/mm/yyyy</i>	
	From another standard to GS4GG		<i>dd/mm/yyyy</i>	
	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	1. Programme of Activity Requirements and Procedures 2. Requirements for Paris Agreement Alignment
	Version	1. Version 3.0 2. Version 1.0
	Paragraph	1. Section 8.5.8 and 8.9.4 2. Section 4.3.2

6.2 | Description of the deviation

Title	Deviation Request for Extension of Crediting/monitoring Period of Concerned VPAs under PoA 4289 for Monitoring Period 10 (01 July 2024 – 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)
	Insert Text here (if required) to support the selection	
Relevant monitoring period, if applicable	Start date	01/07/2024
	End date	31/12/2025
Summarise the changes	The CME requests temporary approval to allow continuation of the current crediting period for VPAs under PoA GS4289 whose crediting period end dates fall before 31 December 2025, solely for the purpose of aligning Monitoring Period 10 with the full 2025 calendar year. This deviation will enable the definition of a consolidated Monitoring Period 10 spanning 01 July 2024 to 31 December 2025, allowing issuance of all emission reductions generated during calendar year 2025 under the currently registered VPA Design Documents and Monitoring Plans. The proposed adjustment is transitional in nature and applies only up to 31 December 2025. From 01 January 2026 onwards, the CME will undertake the mandatory PA-Alignment Design Change and implement the applicable PA-aligned methodology in full compliance with Gold Standard requirements. This approach will ensure an orderly transition to the PA-aligned requirements from 01 January 2026 onwards, while avoiding unnecessary fragmentation of verification for minimal residual durations in 2025.	
Reason for deviation	As per Section 3.1.1 of the Requirements for Paris Agreement Alignment Version 1.0 (22/12/2025), GSVERs with vintage 2026 onwards must be issued under a PA-aligned methodology following successful PA-Alignment validation. Section 4.3.2 further requires projects to undergo a mandatory Design Change process prior to issuance of post 2025 vintages. The CME fully acknowledges these requirements and confirms that all vintages from 01 January 2026 onwards will comply with PA-aligned provisions.	

However, within PoA GS4289, individual VPAs have differing crediting period end dates, several of which conclude during calendar year 2025. The crediting period timelines are presented below for clarity.

VPA Number	Crediting Period Start Date	Current Crediting Period End Date
3	01-12-2015	30-11-2025
4	07-07-2018	06-07-2025
5	20-02-2019	19-02-2026
6	07-09-2020	06-09-2025

As shown above, VPA 4 reaches the end of its crediting period earlier than other VPAs. If next monitoring period (MP10) were aligned strictly with this date (i.e. end date of VPA04 CP, 06/07/2025) to ensure compliance with section 8.5.8 of the "PROGRAMME OF ACTIVITY REQUIREMENTS AND PROCEDURES" version 3.0, only short residual monitoring durations would remain for certain VPAs within calendar year 2025. Under such circumstances, the CME would need to define additional monitoring periods for limited timeframes solely to capture remaining emission reductions under the same crediting period, as shown below.

VPA Number	MP Start Date	MP End Date
3	07/07/2025	30-11-2025
5	07/07/2025	31-12-2025 ⁶
6	07/07/2025	06-09-2025

Furthermore, to claim emission reductions for the remaining portion of calendar year 2025, additional monitoring and verification cycles would be required, as summarized below:

VPA Number	MP Start Date	MP End Date
3	01-12-2025	31-12-2025
4	07-07-2025	31-12-2025
6	07-09-2025	31-12-2025

This situation requires the CME to:

- Undertake crediting period renewals for short interim durations using non-PA-aligned documentation.
- Conduct multiple additional verifications for minimal monitoring windows; and

⁶ As duration of crediting period before 2026 can be claimed using non PA aligned methodology.

	• Immediately thereafter initiating mandatory PA-Alignment Design Change in line with GS requirements. Such fragmented verification activities would introduce disproportionate administrative and financial burden relative to the limited emission reductions involved. The deviation request therefore aims to streamline monitoring period structuring prior to the mandatory methodology transition. Under normal circumstances, VPAs approaching the end of their crediting periods would undergo standard crediting period renewal, after which the same registered project documentation would remain applicable for the subsequent crediting cycle. However, due to the mandatory requirement to apply PA-aligned methodologies for vintages from 2026 onwards, the renewal process is no longer a straightforward continuation of the existing framework. If the monitoring periods are not consolidated as proposed, the CME would be required to complete a crediting period renewal solely to claim emission reductions for a limited residual portion of calendar year 2025 under the current non-PA-aligned documentation. Immediately thereafter, the CME would need to undertake a mandatory PA-Alignment Design Change to apply the updated methodology for vintages from 01 January 2026 onwards. This sequencing would result in multiple design certification processes, first a short-term renewal completion using non-PA aligned methodology, followed shortly by a comprehensive PA-Alignment Design Change, and multiple fragmented verification activities creating unnecessary duplication of efforts. The requested deviation therefore seeks to avoid this procedural redundancy by allowing the current framework to remain applicable until 31 December 2025, enabling a direct and efficient transition to PA-aligned implementation from 2026 onwards.
Proposed resolution	Gold Standard is requested to grant temporary transitional flexibility for PoA GS4289 by approving the following: 1. Allow continuation of the current crediting period for VPAs whose crediting period end dates fall before 31 December 2025, solely for the purpose of aligning monitoring with the full 2025 calendar year. 2. Approval of a consolidated next monitoring period (MP10) covering 01 July 2024 to 31 December 2025 under the currently registered VPA-DDs and Monitoring Plans. 3. Confirmation that the CME will implement the mandatory PA-Alignment Design Change and any required crediting period renewal effective 01 January 2026 onwards, ensuring full compliance with PA-aligned requirements for all subsequent vintages.

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" data-bbox="469 589 1445 745"> <thead> <tr> <th data-bbox="469 589 948 701">Annual emission reduction/removal before applying deviation</th> <th data-bbox="948 589 1445 701">Annual emission reduction/removal after applying deviation</th> </tr> </thead> <tbody> <tr> <td data-bbox="469 701 948 745">XYZ tCO₂e</td> <td data-bbox="948 701 1445 745">XYZ tCO₂e</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.

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