

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	DEVREQ-357
Date of decision	03/06/2026
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 is approved for the monitoring period stated in the deviation request only, subject to VVB confirmation that the application of the KPT derived parameters is methodologically correct and does not result in overestimation of emission reductions.

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

Project Developer shall ensure that :

1. Full documentation of the KPT protocol, sampling design, and ER calculation spreadsheets is maintained and made available for verification.
2. The revised parameters $Bb,y = 3.84 \text{ t/HH/year}$ and $Pp,y = 1.79 \text{ t/HH/year}$ are applied consistently across all affected VPAs (1,2,8 and 9) for the approved monitoring period.
3. If the Project Developer intends to Temporary apply KPT derived Values for Bb,y and Pp,y for Monitoring Period 01.04.2024–31.03.2025, this must be:
 - Transparently reflected in future monitoring plans, and
 - Supported by methodology compliant sampling procedures in subsequent monitoring periods.

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

The VVB shall:

1. Ensure that the revised values are correctly incorporated into emission reduction calculations across all applicable VPAs.
2. Shall confirm that the application of KPT derived parameters does not result in overestimation of ERs
3. also confirm that the KPTs conducted have followed compliance protocols and is fully representative of the project population

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 :	Evelien Lambooij
Email ID ⁴ :	lambooij@fairclimatefund.nl
Organisation: ⁵ :	Fair Climate Fund B.V. Netherlands
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 11242	GS 11246 VPA1 GS 12161 VPA2 GS 12467 VPA8 GS 12468 VPA9
Host country(ies)	India		
Project Title	Fair Climate Programme for Sustainable Household Energy (PoA) - Fair Climate Programme: Bachat project - Odisha, India (VPA 1) Fair Climate Programme for Sustainable Household Energy (PoA) - Fair Climate Programme: Bachat project - Odisha, India (VPA 2) Fair Climate Programme for Sustainable Household Energy (PoA) - Fair Climate Programme: Bachat project - Odisha, India (VPA 8)		

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

Fair Climate Programme for Sustainable Household Energy (PoA) - Fair Climate Programme: Bachat project - Odisha, India (VPA 9)

Registry link [VPA 1](#)
[VPA 2](#)
[VPA 8](#)
[VPA 9](#)

Scale ☒ Microscale (GS)
☐ Small scale
☐ Large scale
☐ Other, if applicable please specify below
Insert text here

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>		GS11246 – VPA 1: 24-11-2022 GS12161 – VPA 2: 01-03-2024 GS12467 – VPA 8: 07-06-2024 GS12468 – VPA 9: 07-06-2024	GS11246 – VPA 1: 24-11-2022 GS12161 – VPA 2: 01-03-2024 GS12467 – VPA 8: 07-06-2024 GS12468 – VPA 9: 07-06-2024	<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
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 <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	Simplified Methodology for Efficient Cookstoves
	Version	Version 1.1
	Paragraph	Section regarding monitoring of fuel consumption parameters $B_{b,y}$ and $P_{p,y}$ and required sampling frequency/methodology.

6.2 | Description of the deviation

Title	Permanent Adoption of KPT-Derived Values for $B_{b,y}$ and $P_{p,y}$		
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	01.04.2024	
	End date	31.03.2025	
Summarise the changes	The deviation involves deviating from the default baseline fuel consumption $B_{b,y} = 4.4$ t/household/year to $B_{b,y} = 3.84$ t/household/year and from $P_{p,y} = 3.17$ t/household/year to $P_{p,y} = 1.79$ t/household/year used in the registered VPA-DDs (based on baseline survey and methodology defaults for India firewood). This applies to ER calculations under SMEC Methodology, ensuring project-specific accuracy across VPAs 1,2,8,9 for the above-mentioned monitoring period.		
Reason for deviation	The KPT was conducted beyond methodology requirements to derive conservative, site-specific parameters reflecting real-world conditions in Odisha tribal households. Ex-ante default savings (~73% vs. KPT 48.15%), leading to inflated ER estimates. This deviation ensures compliance with GS4GG principles of accuracy and conservatism, avoiding over-crediting.		

Proposed resolution	Apply KPT-derived values in all future ER calculations and MRs: For this Monitoring period, apply $B_{b,y} = 3.84$ t/household/year, $P_{p,y} = 1.79$ t/household/year. This maintains completeness (full data coverage), accuracy (statistically valid at 90/30), and conservativeness (uses lower bound of savings, reducing ERs by ~43% per stove).										
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>9,795</td><td>8,268</td></tr> <tr> <td>9,873</td><td>7,828</td></tr> <tr> <td>8,940</td><td>7,791</td></tr> <tr> <td>8,022</td><td>6,914</td></tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	9,795	8,268	9,873	7,828	8,940	7,791	8,022	6,914
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation										
9,795	8,268										
9,873	7,828										
8,940	7,791										
8,022	6,914										
Summary of the impact	The impact of this deviation is centered on increasing the precision of the project's impact quantification: • Project Design: The monitoring plan is strengthened by shifting from theoretical defaults to a permanent KPT-based monitoring cycle. This aligns the project design with high-precision monitoring practices. • SDG Assessment: The impact on SDG 13 (Climate Action) is directly affected as the ER volume per stove is adjusted downward to match field reality, using real-world fuel saving percentages (43.5% reduction) rather than only baseline survey, lab-based efficiency ratings of stoves. • Annual Emission Reduction Volume: There is a significant impact on the total volume of VERs. The ex-post KPT data shows higher fuel consumption in the project scenario than originally estimated ex-ante. • <i>Data Evidence:</i> The KPT Result confirms a $P_{p,y}$ of 1.790 tonnes/year. When extrapolated, the actual achieved ERs per household will be lower than the pro-rated ex-ante estimates in the MR (e.g., in VPA 1, the pro-rated ex-ante was 9,795 tCO₂eq. from 2026 Stoves, but the ex-post KPT data results in 8,268 tCO₂eq. reduction from 3447 Stoves a more conservative final figure. • Verification Rigor: By utilizing a 90/30 confidence/precision threshold for KPT the project provides the VVB and Gold Standard										

	with verifiable, high-quality data that reduces the risk of over-estimation common in default-value applications.
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	The VVB has assessed the proposed deviation from the default <i>baseline fuel consumption</i> and <i>project fuel consumption</i> values applied to VPAs 1, 2, 8, and 9 for the current monitoring period. The assessment included review of the Kitchen Performance Test (KPT) protocol, sampling approach, datasets and calculation sheets under the applicable SMEC methodology. The VVB confirms that the KPT was conducted beyond minimum methodological requirements and reflects actual usage conditions in Odisha tribal households. The revised savings (48.15%) are lower than the ex-ante default estimate (~73%), thereby resulting in conservative ER estimates. The applied parameters are transparently documented and consistently integrated into the ER calculations, thereby enhancing the accuracy of emission reduction quantification and preventing potential over-crediting, in alignment with GS4GG principles of conservativeness and environmental integrity.
VVB's assessment of impact of deviation request	The VVB has assessed the impact of the deviation and confirms that the shift to a permanent KPT-based monitoring cycle strengthens the project design by replacing default assumptions with site-specific, high-precision data. The revised fuel savings (43.5%) and confirmed Pp,y of 1.790 t/household/year directly affect SDG 13 quantification and result in lower ex-post ERs compared to ex-ante estimates, thereby ensuring conservativeness. The re-calculated ER volumes across the concerned VPAs demonstrate a downward adjustment based on field evidence, reducing the risk of over-crediting.
VVB recommendation	Based on the assessment performed, the VVB considers the proposed deviation to be technically justified, transparently documented, and conservatively applied across the concerned VPAs. The adoption of site-specific KPT-derived parameters enhances the accuracy of ER quantification and reduces the risk

		of over-crediting in line with GS4GG requirements under Gold Standard. The VVB therefore suggests the approval of the temporary deviation for the applicable monitoring period.
VVB details	VVB name:	Earthood Services Limited (ESL)
	Auditor name(s):	Anurag Verma (Team Leader)
	Email (s):	anurag.verma@earthood.in

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