

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-363
Date of decision	15/04/2026
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 conditionally approved as per guidance from the paragraph 3.3.2 of the "P&R: Requirements for Paris Agreement Alignment", Version 1.0. In particular, the VPA 3 GS23552 in Madagascar, as the required PA-Aligned Methodology is unavailable at this stage, the VPA is granted an automatic exemption from that deadline. If the CME decides to complete their validation and Design Certification Review using the PA aligned methodology, VPA 3 shall be required to complete validation within 6 months after the relevant PA-Aligned methodology is published.

"3.3.2 | However, if a required PA-Aligned Methodology is unavailable by a project's required submission deadline, the project shall be granted an automatic exemption from that deadline. In such cases, the project shall be required to complete Submission within six (6) months after the relevant PA-Aligned methodology is published".

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

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. Hendrik Hoelzer
Email ID ⁴ :	hendrik.hoelzer@dlight.com
Organisation: ⁵ :	d.light
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	☒ VPA
GS ID	GSXXXX GSXXXX	GS 23548	GS 23549 GS 23550 GS 23551 GS 23552
Host country(ies)	Nigeria, Tanzania and Madagascar		
Project Title	GS23548: d.light Clean Energy Access Programme – Africa ⁶ GS23549: GS23548 VPA-1 d.light Clean Energy Access Programme-Nigeria GS23550: GS23548 RVPA-1 d.light Clean Energy Access Programme-Nigeria GS23551: GS23548 VPA-2 d.light Clean Energy Access Programme-Tanzania GS23552: GS23548 VPA-3 d.light Clean Energy Access Programme-Madagascar		

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

⁶ The name of the PoA is different from the DEVRQ-149 because when DEVRQ-149 was applied, the project was at a planning stage, and the title was not finalised. Post the deviation approval of DEVRQ-149, the project-initiated stakeholder engagement and the project title was changed to "d.light Clean Energy Access Programme – Africa" from "d.light Solar Lighting Programme – Africa".

Registry link	Not applicable. The project is under preliminary review.											
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 New								
Applied version of Standard	☒ GS4GG ☐ Previous version of Gold Standard											
	<table border="1"> <tr> <td colspan="4">Version no.</td> </tr> <tr> <td>☐ 1.0</td> <td>☐ 1.1</td> <td>☐ 1.2</td> <td>☐ 2.2</td> </tr> </table>				Version no.				☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
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	DEVQ- 149		
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

6.1 | Standard document reference

Title	PoA Requirements and Procedures
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Standard document reference	Version	3.0
	Paragraph	Paragraph 8.10.1

6.2 | Description of the deviation

Title	Deviation pertains on requesting deferred submission of one of the real case VPA (GS23552) for Multi-country PoA	
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	NA
	End date	NA
Summarise the changes	The Project Developer (PD) seeks a deviation from the requirement under Section 8.10.1 of the Programme of Activity Requirements & Procedures (Version 3.0), which mandates the submission of a real case VPA-DD for each country included in a multi-country Voluntary PoA at the time of PoA validation. The PoA covers the distribution of solar lighting systems across three African countries — Nigeria, Tanzania, and Madagascar — and is structured as a PoA with three real case VPAs. In Nigeria and Tanzania, distribution of solar lighting systems commenced in August 2023 and is already at an advanced stage of implementation. The project is eligible to apply non-PA aligned methodology (AMS III.AR) for quantification of credits till end of 2025. In Madagascar, distribution commenced in September 2025, and as per recent announcements by Gold Standard, the project will require to apply PA aligned methodology in order to quantify emission reduction for vintage 2026 onwards. Hence it does not make sense for PD to proceed with validation and design certification of Madagascar VPA with CDM methodology AMS III.AR to just claim emission reductions for four months of the year 2025. The PoA, 3 real case VPAs (GS23549, GS23551, GS23552) and 1 regular VPA (GS23550) have already been submitted for preliminary review. Given this context, the PD requests that Gold Standard permit the validation and design certification to proceed based on the PoA with the two real case (GS23549, GS23551) and one regular case VPAs (GS23550) from Nigeria and Tanzania, using the non-PA aligned methodology (AMS III.AR). The third real case VPA for Madagascar (GS23552) would be submitted for validation and subsequently design certification once Gold Standard approves the applicable PA-aligned methodology (Revision to CDM AMS III.AR methodology to align with Article 6 principles has been submitted by d.light and is under consideration by GS Secretariat). This approach would enable	

	the PoA to move forward without delay while maintaining investor confidence. Significant investments have been made under the project which includes setting of distribution networks, conducting PoA- Design and local stakeholder consultation (LSC) etc. Additionally, there are investor milestone commitments linked to the project.
Reason for deviation	The Project Developer is requesting a deviation from the requirement under Section 8.10.1 of the Programme of Activity Requirements & Procedures (Version 3.0), which requires submission of real case VPA-DDs for each country included in a multi-country Voluntary PoA at the time of PoA validation. The deviation is sought to allow submission of real and regular case VPA-DDs (GS23549, GS23550, GS23551) for Nigeria and Tanzania for validation, while Madagascar (GS23552) submitted as a real case VPA at a later stage. The primary reason for this request is the differing stages of project implementation across the three countries. In Nigeria and Tanzania, the distribution of solar lighting systems commenced in August 2023 and has progressed to an advanced stage. These project activities have already established implementation arrangements, supply chains, monitoring systems, and stakeholder engagement processes, making them suitable for submission as real case VPAs at the time of PoA validation and design certification. In contrast, project implementation in Madagascar commenced only recently in September 2025 and remains at an early stage. While the stakeholder consultations have been completed, the project activity is required to apply a PA-aligned methodology for credits accrued from 1 January 2026 onwards; however, the relevant PA-aligned methodology is currently not available. As a result, preparation of a real case VPA-DD (GS23552) for Madagascar at this stage is not feasible. The requested deviation is limited in scope and procedural in nature, does not compromise environmental integrity or stakeholder safeguards, and is intended to align documentation timelines with actual project implementation maturity across countries. The Project Developer remains committed to submitting the real case VPA for Madagascar for validation and subsequent design certification in accordance with Gold Standard requirements once implementation progresses sufficiently and PA-aligned methodology is released.
Proposed resolution	NA
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>	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						
	☐ any other matrix, please specify...						
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

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