

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 Balexert 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.

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4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-380
Date of decision	16/05/2026
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 request is approved considering the justifications provided by the project developer on the appropriateness of a 30-day window in context of representativeness, behavior patterns and active usage.

The approved approach may be applied for the current monitoring period as proposed.

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

The PD shall ensure that SUM deployment follows a statistically valid random sampling approach and any future changes to sampling design shall be justified and documented.

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

VVB must confirm that SUM based monitoring is implemented in accordance with:

1. The registered monitoring plan
2. The sampling approach is statistically representative across the project boundary
3. Verification of usage rate calculation is done as per approved conservative approach and no alternative and adjusted calculations are applied.

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
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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)	
NA	

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 :Anantha Karthik Rajagopalan	Insert Text here
Email ID ⁴ :anantha@upenergygroup.com	Insert Text here
Organisation: ⁵ UpEnergy Group	Insert Text here
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		GS 10963	GS 12120
Host country(ies)	Uganda		
Project Title	GS1210 Community Carbon Efficient Cooking Programme- VPA 17		
Registry link	https://registry.goldstandard.org/projects/details/4137		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>The GS PoA includes both Large and Small Scale VPAs</i>		
Certification Status and corresponding date of latest status	☐ Listed ☒ Certified design 17/07/2023	☒ Certified project 10/02/2025	☐ Other <i>If other, specify here</i> dd/mm/yyyy
☒ GS4GG			

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

Applied version of Standard	☐ 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 <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		
Status of the deviation	☐ Approved	☐ Rejected
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	Requirements and Guidelines: Usage rate monitoring
	Version	V2.0
	Paragraph	Para 2.1

6.2 | Description of the deviation

Title	Deviation in the Usage Monitoring Methodology	
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	Project Developer (PD) has been implementing improved cookstove projects in several SSA countries under the PoA 10963 and PoA 10898 by applying TPDDTEC v3.1 and v 4 (RECH) methodologies, wherein the stove usage rate is monitored in accordance with the GS4GG Requirements and Guidelines: Usage Rate Monitoring v2.0. PD adopts 'Good Practice' for the usage rate monitoring requirement in all its VPAs and applies a cap of 90% in line with the guidelines. As per PD's vision for continuous improvement, PD intends to introduce digital continuous Stove Usage Monitors (SUMs) 'The Digital SUM Monitoring', for a period of 30 days. While the GS4GG Usage Guideline already qualifies digital SUM-based monitoring as a "Best Practice" and allows to claim the usage rate above 90% with a monitoring window of 90 days, PD proposes a 30-day period of SUM over and above the requirement of "Good Practice" and still maintaining the conservative cap of 90% stove usage rate. Hence a reduction of digital SUM-based monitoring from 90 days to 30 days is requested.																		
Reason for deviation	The PD aims to include an additional Digital SUM-based monitoring over and above its current "Good Practice" for the usage rate monitoring requirement to improve the accuracy and robustness of the usage monitoring.																		
Proposed resolution	The Requirements and Guidelines: Usage Rate Monitoring v2.0 defines three levels of usage monitoring—Mandatory, Good Practice, and Best Practice—with corresponding claimable usage rates as given in the below table: <table border="1"> <thead> <tr> <th>Level</th><th>Applicability</th><th colspan="2">Claimable usage rate Requirements</th></tr> </thead> <tbody> <tr> <td>Mandatory</td><td>Mandatory</td><td>Upto maximum 75</td><td> • Define use and nonuse • In-person household usage survey • Verification of accuracy of results </td></tr> <tr> <td>Good Practice</td><td>Optional</td><td>Upto maximum 90%</td><td> • Field team training and supervision • End-user training and follow-ups • Awareness campaign </td></tr> <tr> <td>Best Practice</td><td>Optional</td><td>Above 90%</td><td> • Continuous use monitoring </td></tr> </tbody> </table> Presently PD adopts the "Good Practice" for the usage rate monitoring requirements and going forward we propose an additional layer of digital SUM-based monitoring. The usage rate guideline recommends a			Level	Applicability	Claimable usage rate Requirements		Mandatory	Mandatory	Upto maximum 75	• Define use and nonuse • In-person household usage survey • Verification of accuracy of results	Good Practice	Optional	Upto maximum 90%	• Field team training and supervision • End-user training and follow-ups • Awareness campaign	Best Practice	Optional	Above 90%	• Continuous use monitoring
Level	Applicability	Claimable usage rate Requirements																	
Mandatory	Mandatory	Upto maximum 75	• Define use and nonuse • In-person household usage survey • Verification of accuracy of results																
Good Practice	Optional	Upto maximum 90%	• Field team training and supervision • End-user training and follow-ups • Awareness campaign																
Best Practice	Optional	Above 90%	• Continuous use monitoring																

	monitoring window of 90 days for SUMs with claimable usage rate of above 90%, whereas PD would like to deviate from this and propose a 30 days period and still applies cap of 90% as per the "Good Practice" level. Further PD intends to use the minimum usage rate obtained from the usual survey-based usage monitoring ($U_{p,ySurvey}$) and continuous usage monitoring through SUMs with a 90% cap ($U_{p,y SUMs}$) i.e. $\text{Min}(U_{p,ySurvey}, U_{p,y SUMs})$ in the ER computation thereby resulting in conservative ER values. Hence this proposition would require a deviation on the two fronts i.e., a reduction in the SUM monitoring days and a modification in the approach for usage rate calculation. The primary deviations from GS4GG Requirements and Guidelines: Usage Rate Monitoring v2.0 are as follows, Proposed Changes: Monitoring Approach: Proposing an extra layer of continuous monitoring by utilization of digital SUMs in addition to the existing physical survey-based usage monitoring in accordance with the "Good Practice" for the usage rate monitoring requirements. This calls for no deviation from the usage guideline. Duration of SUMs Monitoring: Reduce the duration of digital/continuous monitoring from 90 to 30 days, hence the deviation is requested Usage Rate Calculation: The final claimable usage rate will be determined by taking the minimum of the two values obtained from SUM digital monitoring and the physical survey and by applying a 90% cap in both methods Applicable Usage rate ($U_{p,y}$) = $\text{Min}(U_{p,y SUMs}, U_{p,ySurvey}$)				
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="472 1706 1441 1865"> <thead> <tr> <th data-bbox="472 1706 951 1823">Annual emission reduction/removal before applying deviation</th><th data-bbox="951 1706 1441 1823">Annual emission reduction/removal after applying deviation</th></tr> </thead> <tbody> <tr> <td data-bbox="472 1823 951 1865">XYZ tCO_{2e}</td><td data-bbox="951 1823 1441 1865">XYZ tCO_{2e}</td></tr> </tbody> </table> ☒ any other matrix, please specify... there is no material impact on the annual emission reduction volume nor in the design of the project, as conservative data treatment and existing quality control measures ensure robustness of the monitored stove usage data. The deviation is	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO _{2e}	XYZ tCO _{2e}
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				
XYZ tCO _{2e}	XYZ tCO _{2e}				

	limited in scope and does not introduce any temporary or permanent adverse impacts on other aspects of the project.
Summary of the impact	An additional layer of digital/continuous monitoring is being introduced to enhance the accuracy and robustness of the stove usage monitoring, thereby improving the overall quality of the project.
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 ☐
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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	VVB confirms that the deviation request is reviewed against section 3.2.3 of the deviation request requirements and procedures v2.0. relates to the introduction of digital Stove Usage Monitors (SUMs) as an additional monitoring layer, implemented beyond the requirements of the registered monitoring plan and GS4GG "Good Practice" usage rate monitoring. The VVB notes that the PD did not replace the registered survey-based usage monitoring approach; instead, the digital monitoring was implemented over and above the existing approved monitoring plan. To ensure conservativeness, the final usage rate applied is determined as the lower value between (i) the survey-based usage rate and (ii) the SUM-based usage rate, both subject to the 90% cap.
VVB's assessment of impact of deviation request	The VVB has reviewed the PD's request for a permanent deviation for the introduction of Digital Stove Usage Monitors (SUMs) for determining stove usage rates. - The PD has implemented Digital SUM-based monitoring for a duration of 30 days, rather than the 90-day monitoring period recommended under the GS4GG Usage Monitoring Guideline to qualify as "Best Practice." - Notwithstanding the shorter monitoring duration, the PD has proposed to maintain a cap of 90% on the stove usage rate, consistent with the "Good Practice"

		requirements of the guideline. This ensures that the reduced monitoring window does not result in inflated usage rates or overestimation of emission reductions. The PD has applied the same approach in the previous monitoring period for the calculation of monitoring usage rate against the survey based approach as stated in the registered VPA-DD. The deviation maintains environmental integrity, complies with safeguarding principles and host country regulations, and does not compromise the project's SDG contributions.
VVB recommendation		The VVB notes that the deviation aligns with requirements of paragraphs 3.2.3 of the Deviation Request Requirements and Procedures v.2.0. PD's approach demonstrates adherence to the principles of conservativeness, as required under the deviation procedures. PD avoids any risk of overstating emission reductions by using the minimum usage rate obtained between usual survey-based usage monitoring and continuous usage monitoring through SUMs with a 90% cap, this is further in line with the Usage Rate Monitoring v2.0. Therefore, the VVB Recommends approval of the deviation request, with the confirmation that methodological compliance will be restored for the following monitoring period.
VVB details	VVB name:	Earthood Services Limited
	Auditor name(s):	Team Leader: Diyotima Karfa TA Expert 3.1: Neharika Chandanani GS Approved Auditor: Diyotima Karfa; Neharika Chandanani Trainee Verifier: Mohit Gupta Local Expert: Khalayi Irene Martha
	Email (s):	operations@earthood.in Diyotima.karfa@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