

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 Balxert 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-410
Date of decision	25/05/2026
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 request is conditionally approved. The CME could conduct the design change for voluntary methodology upgrade for regular VPA "GS10789 GS11673 RVPA-64: Efficient and Clean Cooking for households in Nigeria" (GS12283) without mandatory methodology upgrade of the relevant real case.

The design change for the regular VPA (GS12283) to TPDDTEC v4.0 shall be limited to the purpose of CCP labelling, and CCP-labelled credits may be claimed up to and including the 2025 vintage under this arrangement.

The VVB shall validate and provide opinion on whether there is any risk/potential impact to the relevant real case VPA.

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

The CME shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the CME. The CME shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision. The CME shall document the deviation request, its implications, and GS' decision in the appropriate section of the project document.

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

The VVB shall validate the design change with limited only to the purpose of CCP labelling.

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 :	Nathan Gachugi
Email ID ⁴ :	nathan.gachugi@burnmfg.com
Organisation: ⁵ :	BURN Manufacturing Co.
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 XXXX GS XXXX	GS12283 GS XXXX
Host country(ies)	Federal Republic of Nigeria		
Project Title	GS10789 GS11673 RVPA-64: Efficient and Clean Cooking for households in Nigeria		
Registry link	https://assurance-platform.goldstandard.org/project-documents/GS12283		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>Insert text 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

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>21/01/2025</i>	<i>dd/mm/yyyy</i>	<i>dd/mm/yyyy</i>
Applied version of Standard	☒ GS4GG			
	☐ Previous version of Gold Standard	Version no.		
		☐ 1.0	☐ 1.1	☐ 1.2
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	Core Carbon Principles Labelling of Gold Standard Verified Emission Reductions
	Version	V2.0 & V3.0
	Paragraph	para 1.2.1 (c)

6.2 | Description of the deviation

Title	Applicability of CCP Labelling for Regular VPA Independent of Real-Case VPA	
Confirm the nature of changes related to deviation	☒ Temporary not expected to occur beyond one monitoring period	☐ Permanent (e.g. deviation from requirements prior to submission for certification)
	Deviation to allow the applicability of CCP labelling for a regular VPA without applying the same methodological update to the Real-case VPA	
Relevant monitoring period, if applicable	Start date	
	End date	
Summarise the changes	We respectfully submit this deviation request concerning the update of the applied methodology, TPDDTEC, from version 3.1 to version 4.0. Our request seeks approval to voluntarily update to the most recent version of the methodology (TPDDTEC v.4.0) at the VPA level to meet CCP labelling requirements. This request is submitted in accordance with Section 1.2.1 (c) of the Core Carbon Principles Labelling of Gold Standard Verified Emission Reductions requirements. Specifically, we request permission to apply this methodology update to the regular VPA through a design change without requiring a simultaneous update to the real-case VPA or the PoA.	
Reason for deviation	Rationale for the Request 1. Applicability requirement for CCP labelling of GS VERs As per Section 1.2.1 (c), Project Developers (PDs) may update to a newer version of a methodology to meet CCP labelling requirements through a design change. Because this CCP upgrade is an elective, market-driven enhancement rather than a mandatory methodological transition dictated by Gold Standard, it is our understanding that it is procedurally permissible for distinct VPAs under the same PoA to operate under different methodology versions or crediting approaches based on their specific strategic considerations. 2. Divergent VPA Requirements There is a distinct mismatch in the commercial mandates of the VPAs in question. The regular VPA (e.g., GS12283) has an investment mandate that necessitates a Version 4.0 upgrade to achieve CCP compliance. Conversely, the corresponding real-case VPA (GS11673) does not require CCP-related changes and will not be pursuing this voluntary upgrade at this time. 3. Principle of Conservativeness The methodology changes implemented in the regular VPA are conservative in nature and safeguard environmental integrity. Specifically: • Direct CO₂ and non-CO₂ emission factors for charcoal have been applied to mitigate uncertainties associated with the wood-to-charcoal emission factor.	

	- The conservative default value for the f_{NRB}, as per the latest updated Tool 33, has been applied in place of a calculated, higher value. - A default 5% leakage deduction has been applied instead of utilizing monitored survey values (which have historically demonstrated leakage rates of 0% to less than 5%). 4. Mandatory update required for post 2026 credits Under the latest Paris Agreement Crediting Mechanism (PACM) requirements, all projects or VPAs seeking credit issuance for vintages from 2026 onward must apply PACM-aligned methodologies. Therefore, a mandatory design change to upgrade both the real-case and regular VPAs to the latest methodology version will inevitably occur in the future.						
Proposed resolution	We respectfully request that Gold Standard permit the regular VPA to upgrade to TPDDTEC v4.0 via a CCP design change, independent of the real-case VPA, to facilitate the claiming of CCP-labelled credits up to the 2025 vintage. Both the real-case and regular VPAs will subsequently be uniformly updated to align with the PACM-aligned methodology once it is published and becomes mandatory for post-2026 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"> <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,	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.						

• **Environmental Integrity & Conservativeness:**

The impact on emission reductions is highly conservative. The adoption of default f_{NRB} values, default leakage rates (5%), and stricter emission factors ensures that the calculated emission reductions for the regular VPA will not be overestimated.

• **Administrative & PoA Impact:**

Granting this deviation will cause no adverse structural impact to the overarching PoA. It simply allows parallel operational tracks for VPAs with differing market demands, preventing unnecessary administrative burdens on the real-case VPA prior to the mandatory PACM transition.

- **Market Impact:**

This deviation facilitates the immediate mobilization of climate finance by allowing the regular VPA to meet investor demands for high-integrity, CCP-labelled credits without being hindered by the differing timeline of the real-case VPA.

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