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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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.

Table of Content

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-424
Date of decision	15/06/2026
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 deviation request is conditionally approved for the monitoring period 01/02/2023 - 31/01/2024. The project developer/VVB must submit together with the Performance review request the following:

- Original and updated VVB contracts and communication demonstrate that the site visit scope was originally for both validation and first verification.
- Evidence collected in initial audit and site visit in April 2024 adequately covers both the Design Certification and Performance Review requirements.
- Samples size for each survey (baseline survey, baseline KPT, project survey, project KPT) with questionnaires and justification on how sample size for each of the survey meets the sampling requirement.

In accordance with the clarification provided in CLRQ-171, the project developer shall ensure the frequency of physical site visits as per Section 3.1 of the Site Visit and Remote Audit Requirements and Procedures – V2.0.

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

The project developer 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 project developer. The project developer shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision. The project developer 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, through appropriate means at disposal, evaluate the project's compliance with the above-mentioned conditions and provide VVB opinion in the validation/verification report.

4.2.4 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the project developer and the VVB for appropriateness, accuracy and consistency.

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] :	Sushant Vashisht
Email ID[4] :	sushant.vashisht@earthood.in
Organisation:[5]:	Earthood Services Limited
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	*GS XXXX*		GS11253		GS11790
Host country(ies)	Kenya				
Project Title	Dziva Cookstove Project				
Registry link	**https://registry.goldstandard.org/projects/details/3771**				
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 *If other, specify here*
	dd/mm/yyyy	*dd/mm/yyyy*		20/09/2024	*dd/mm/yyyy*

[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

<table>
<tr><td rowspan="3">Applied version of Standard</td><td colspan="5">☒ GS4GG</td></tr>
<tr><td rowspan="2">☐ Previous version of Gold Standard</td><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>
<tr><td rowspan="4">Transition date, if applicable</td><td colspan="3">From previous GS version to GS4GG</td><td colspan="2">dd/mm/yyyy</td></tr>
<tr><td colspan="3">From another standard to GS4GG</td><td colspan="2">dd/mm/yyyy</td></tr>
<tr><td colspan="2" rowspan="2">Name of another standard</td><td colspan="3">☐ CDM</td></tr>
<tr><td colspan="3">☐ Other
Name of the Standard – Insert text here</td></tr>
<tr><td>Applicable activity requirement</td><td colspan="5">☐ Renewable Energy Activity Requirements
☒ Community Services Activity Requirements
☐ Land-use and Forests Activity Requirements
☐ Other
Insert name here</td></tr>
</table>

5.4 | Project deviation history

<table>
<tr><td colspan="3">Is there any deviation request(s) for the same project activity/PoA/VPA(s) that was submitted to GS previously? If yes, below information.</td><td>☐ Yes
☒ No</td></tr>
<tr><td>Reference number</td><td colspan="3">Insert Text here</td></tr>
<tr><td>Status of the deviation</td><td>☐ Approved</td><td>☐ Rejected</td><td>☐ Under review</td></tr>
<tr><td rowspan="2">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?</td><td colspan="3">☒ Yes ☐ No</td></tr>
<tr><td colspan="3">Summary of the findings
The FAR#01 has been raised during the Performance review round 3 description of the FAR#01 has been reflected in the Appendix IV of the Verification report version 5.0 Dated: 22/04/2026.
The description of FAR#01 is described below:

This FAR is raised due to a procedural misalignment with Section 2.2 of the “RU 2020 PR – PR V1.2”, arising from the unplanned transition from a combined Design Certification and Performance Review audit (conducted between 10/04/2024 and 12/04/2024) to separate certification processes. While the initial audit was conducted in accordance with applicable requirements at the time, the revised certification structure necessitates adherence to audit team independence provisions.

A Forward Action Request is hereby raised requiring</td></tr>
</table>

	the subsequent VVB to conduct a physical site visit at least once within every three (3) years following the initial site visit undertaken between 10/04/2024 and 12/04/2024. This requirement shall be implemented in accordance with Section 3.1 of the *"Site Visit and Remote Audit Requirements and Procedures V2.0"* and Section 2.2 of the *"RU 2020 PR – PR V1.2."* This FAR is issued to ensure the continued integrity and impartiality of the verification process. Accordingly, the subsequent verification shall be performed by a verification team comprising the Lead Auditor, auditors, and technical area experts that is independent of the team involved in the validation activities. Compliance with the requirements stipulated under Section 3.1 of the *"Site Visit and Remote Audit Requirements and Procedures V2.0"* shall be demonstrated during the subsequent verification.

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	Rule update: Validation & Verification by same VVB (RU 2020 PR – PR V1.2)
	Version	V1.2
	Paragraph	Section 2.2

6.2 | Description of the deviation

Title	Deviation Request for Use of Same Audit Team for Validation and Verification under Initially Planned Combined Design Certification and Performance Review for Project GS11790	
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	01/02/2023
	End date	31/01/2024
Summarise the changes	The deviation resulted from an unplanned shift from a combined Design Certification and Performance Review to a staggered process due to external changes. While the initial audit and site visit (April 2024) were	

	compliant, the revised sequencing created a procedural misalignment with audit team independence requirements. Based on Secretariat clarification (CLRQ-171), the existing site visit evidence remains valid and usable. The deviation is considered temporary and case-specific, with no material impact on verification integrity or outcomes. The VVB emphasises that this deviation constitutes a procedural exception & temporary in nature and shall be treated on a case-specific basis.
Reason for deviation	The deviation is sought by the VVB, in coordination with the CME, in relation to the use of the same audit team for both validation and verification activities for project GS11790. Initially, the project was designed to undergo a combined Design Certification and Performance Review. In accordance with paragraph 5.1.53 of the *Principles and Requirements (V1.2 and V2.1)*, the requirement for separate audit teams is not applicable in cases where Design Certification is conducted in conjunction with the first verification and Performance Review for a given project. Under such circumstances, the same audit team may perform both validation and verification activities and accordingly, the same audit team conducted the site visit between 10/04/2024 and 12/04/2024, covering both scopes in line with the planned combined Design Certification and Performance Review request. However, due to unforeseen circumstances, including organizational restructuring and a change in the implementing partner, the combined certification process could not be completed as intended, resulting in a staggered submission wherein only the Design Certification was submitted for review, with the Performance Review deferred. This shift in audit sequencing subsequently triggered the applicability of Section 2.2 of the “Gold Standard Rule Update: Validation and Verification by Same VVB (RU 2020 PR – PR V1.2)”, which requires separation of validation and verification teams. Accordingly, the deviation is sought to address this procedural misalignment and Misarticulation of CLRQ-171(discussed in section 6.3 below) by GS4GG & VVB as the same audit team was initially engaged under a combined audit plan, but the subsequent decoupling of certification stages necessitates compliance with team independence

	requirements that were not originally envisaged at the time of the site visit.
Proposed resolution	The assessment team has raised FAR#01 (refer Table 4, Appendix IV of the Verification Report). This FAR is issued to ensure alignment with the applicable requirements under Section 2.2 of the Gold Standard Rule Update: Validation and Verification by Same VVB (RU 2020 PR – PR V1.2), as well as Section 3 of the "Site Visit and Remote Audit Requirements and Procedures – V2.0". The FAR requires that the subsequent VVB conducts the site visit in full compliance with these provisions, specifically mandating the application of independent audit arrangements. In this regard, the verification audit team including the Lead Auditor, verifier/assessor, technical area experts, technical reviewer & TA expert to TR shall be demonstrably distinct from the team that undertook the validation & 1st verification. This requirement is established to uphold the principles of integrity, objectivity, and impartiality of the verification process, in accordance with Section 3.1 of the "Site Visit and Remote Audit Requirements and Procedures – V2.0".
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 *(if yes, fill the table below)* Annual emission reduction/removal before applying deviation: 35,546 tCO_2e Annual emission reduction/ removal after applying deviation: 35,546 tCO_2e ☐ any other matrix, please specify…
Summary of the impact	Non-compliance of section 2.2 of Gold Standard Rule Update Validation and Verification by Same VVB (RU 2020 PR – PR V1.2)," due to miss articulation of CLRQ-171 by VVB & GS4GG & potential non Compliance with the site visit frequency requirements outlined in Section 3.1 of the "Site Visit and Remote Audit Requirements and Procedures – V2.0", in subsequent verification.

Annual emission reduction/removal before applying deviation	Annual emission reduction/ removal after applying deviation
35,546 tCO_2e	35,546 tCO_2e

Insert text here

6.3 | VVB information

Is a VVB opinion on the deviation request required?	Yes ☒ No ☐

VVB opinion shall be included, where required by the requirements under [Deviations Request Requirements and Procedures](#) or request is submitted by the VVB.	The VVB would like to clarify that the project was initially intended to undergo a combined Design Certification and Performance Review. In line with this approach, a single audit team conducted the site visit between 10/04/2024 and 12/04/2024 covering both scopes. However, due to unforeseen internal restructuring within EcoAct and a change in the implementing partner of the project developer, the CME was unable to provide the required verification documentation within the stipulated timeline. Consequently, the combined certification approach could not be completed, and only the Design Certification request was formally submitted & design certificated on 20/09/2024. Subsequently, the VVB raised concern with the CME regarding the validity and appropriateness of relying on the aforementioned site visit for the current verification scope. Given the time elapsed since the site visit, the VVB noted uncertainty as to whether the evidence collected would remain valid for the purposes of Performance Certification. In response, the CME initiated a formal clarification request (CLRQ-171). The VVB confirms that a formal request for clarification was submitted to the Gold Standard Secretariat on 03/07/2025, subsequent to the Design Certification request, to seek confirmation on whether the same site visit conducted between 10/04/2024 and 12/04/2024 covering both scopes could be considered valid for both Design Certification and Performance Review. The VVB further reiterates that, in instances where a combined audit approach is adopted, it is standard practice for the same audit team to

	undertake both the Design Certification and Performance Certification assessments. Gold Standard Secretariat has provided formal clarification under Section 1.2 of CLRQ-171, stating that "*There is no expiry date for a site audit conducted by a VVB when combining both validation and verification audits. For future verifications, the Project Developer shall ensure the frequency of physical site visits as per Section 3.1 of the 'Site Visit and Remote Audit Requirements and Procedures' – V2.0.*" and in section 3.1 of CLRQ-171, under para 3 is mentioned "*The combined audit was conducted in person April 2024. The audit was successful, and all of the surveyed individuals and surveys (both the pKPT and usage surveys) all remain relevant and are being used as part of this verification*." The justification for the delayed submission of the Design Certification and Performance Certification requests has also been noted i.e., 1. Replacing the partner due to differences and going through the proper legal process to do so. 2. Sustain Cert incorrectly deactivated the Design Certification review on their platform and ignored our emails for over 2.5 months to reactivate it. Based on the above clarification, the VVB interpreted CLRQ-171 to allow the verification audit to be considered valid, notwithstanding that the audit for both scopes was conducted concurrently and not submitted to the Secretariat at the same time. However, noting the Secretariat's emphasis on compliance with the "Gold Standard Rule Update

	Validation and Verification by Same VVB (RU 2020 PR – PR V1.2)," the deviation is being requested and additionally, The assessment team has raised FAR#01 (refer Table 4, Appendix IV of the Verification Report). This FAR is issued to ensure alignment with the applicable requirements under Section 2.2 of the Gold Standard Rule Update: Validation and Verification by Same VVB (RU 2020 PR – PR V1.2), as well as Section 3 of the "Site Visit and Remote Audit Requirements and Procedures – V2.0". The FAR requires that the subsequent VVB conducts the site visit in full compliance with these provisions, specifically mandating the application of independent audit arrangements. In this regard, the verification audit team including the Lead Auditor, verifier/assessor, technical area experts, technical reviewer & TA expert to TR shall be demonstrably distinct from the team that undertook the validation & 1st verification. This requirement is established to uphold the principles of integrity, objectivity, and impartiality of the verification process, in accordance with Section 3.1 of the "Site Visit and Remote Audit Requirements and Procedures – V2.0".

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 deviation request in accordance with applicable Gold Standard requirements, including the *Validation and Verification by Same VVB* ((RU 2020 PR – PR V1.2)) and Section 3.1 of the *Site Visit and Remote Audit Requirements and Procedures – V2.0*. The deviation arises from an unplanned change in certification sequencing, wherein a site visit conducted between 10/04/2024 and 12/04/2024 under a combined Design Certification and Performance Review audit approach was subsequently followed by staggered submission of certification requests. This change resulted from external factors, including organisational restructuring and a change in the implementing partner, and was not foreseen at the time of audit execution. The VVB confirms that the initial audit was planned and conducted in line with the combined audit provisions under the applicable Gold Standard framework, and that the site visit covered both validation and verification scopes.

	The VVB further notes that formal clarification (CLRQ-171) was obtained from the Gold Standard Secretariat. After the submission of design request to the Secretariat confirmed that: • Site visits conducted under a combined audit approach do not have a defined expiry, provided the evidence remains relevant; and • The data and findings from the April 2024 site visit remain valid and applicable for the current Performance Review; and • Subsequent verifications must comply with site visit frequency requirements under Section 3.1 of the applicable procedures. Based on the above, the VVB considers that the use of the April 2024 site visit evidence for the current Performance Review is conditionally acceptable. However, the VVB notes that the non-simultaneous submission of Design Certification and Performance Review, despite a combined audit having been conducted, results in a procedural deviation from the intent of Section 2.2 of RU 2020 PR – PR V1.2 concerning audit team independence. The VVB further acknowledges a procedural risk related to perceived independence and audit sequencing. In this regard, FAR#01 has been raised to ensure full separation of validation and verification functions for subsequent verification activities, in line with applicable requirements. The VVB concludes that the deviation represents temporary in nature and a procedural exception arising from documented external constraints and does not constitute standard practice. The deviation is therefore shall be treated on a case-specific basis, subject to: • Adherence to the conditions outlined in CLRQ-171 • Implementation of corrective actions as defined in FAR#01, and • Compliance with auditor independence and site visit frequency requirements for all subsequent verifications.
VVB's assessment of impact of deviation request	The VVB assesses that the deviation has no material impact on the integrity, accuracy, or credibility of the verification outcome. The primary audit evidence was collected through a site visit conducted in accordance with an originally compliant combined audit approach. As confirmed by the Gold Standard Secretariat under CLRQ-171, such evidence remains valid where relevance is maintained. The VVB confirms that the data, surveys, stakeholder consultations, and monitoring evidence collected during the April 2024 site visit remain applicable and have been appropriately used for the current verification. The VVB confirms that: • Monitoring data are independently generated and verifiable. • Emission reduction calculations are methodology-driven and conservative

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- Baseline, additionality, and applicability assessments were completed at Design Certification and remain unaffected; and
- No Verified Emission Reductions were issued prior to completion of the Performance Review.

Accordingly, no risk of over-crediting, data misrepresentation, or compromise of environmental integrity has been identified.

However, the VVB recognises the following procedural impacts:

- Misalignment with Section 2.2 of RU 2020 PR – PR V1.2 due to decoupled certification processes.
- Potential compliance consideration with respect to site visit frequency requirements under Section 3.1 of the applicable procedures; and
- A moderate risk to perceived audit independence due to use of the same audit team under a subsequently decoupled certification process.

These risks are temporary in nature and have been adequately mitigated through FAR#01 and alignment with Secretariat guidance.

The VVB concludes that the deviation does not affect the validity of audit conclusions or the credibility of the emission reductions but requires formal acknowledgement and corrective action.
</td></tr>
<tr><td colspan="2">VVB recommendation</td><td>

The VVB recommends conditional acceptance of the deviation on an exceptional and case-specific basis, taking into account:

- The originally compliant combined audit approach.
- Documented external factors leading to staggered certification.
- Formal clarification provided by the Gold Standard Secretariat (CLRQ-171); and
- Absence of material impact on environmental integrity or verification outcomes.

This recommendation is subject to:

- Implementation and closure of FAR#01 to ensure full compliance with auditor independence requirements; and
- Strict adherence to the *Validation and Verification by Same VVB (RU 2020 PR – PR V1.2)* and Section 3.1 of the *Site Visit and Remote Audit Requirements and Procedures – V2.0* for all subsequent verifications.

The VVB emphasises that this deviation constitutes a procedural exception and shall be treated on a case-specific basis.
</td></tr>
<tr><td rowspan="3">VVB details</td><td>VVB name:</td><td>Earthood Services Limited</td></tr>
<tr><td>Auditor name(s):</td><td>Sushant Vashisht</td></tr>
<tr><td>Email (s):</td><td>sushant.vashisht@earthood.in</td></tr>
</table>

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. – CLRQ-171

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