



Gold Standard[®]
for the Global Goals

FORM

FORM - DEVIATION REQUEST SUBMISSION

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VERSION: 6.0

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RELATED DOCUMENTS

– [Deviations Approval Requirements and Procedures](#)

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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-437
Date of decision	08/06/2026
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 subject to the following conditions:

- The combined pre-harvest season usage monitoring data (from end of March to June, and from mid-August/September to October/November) shall total a **minimum of 90 days** of pre-harvest season data, as guided under CLRQ-328 for this proposed project.
- The SUM sensors shall remain installed on the **same stoves and in the same households** throughout the entire monitoring campaign (including the post-harvest season gap period) to ensure data continuity and avoid selection bias.
- The data collected during the post-harvest season (June to mid-August) shall be **clearly separated** from pre-harvest data using timestamps recorded by the SUM devices and shall only be used for the post-harvest season emission reduction calculations.
- No data shall be double counted across seasons. The project developer must demonstrate clear seasonal allocation of all data points in the monitoring report.
- The approved deviation applies to the **current monitoring period only**. For future monitoring periods, the project developer should plan sensor deployment timelines to minimize the need for non-continuous aggregation where feasible.

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 validating VVB shall, through appropriate means at disposal, evaluate that the project's compliance with the above-mentioned conditions and provide VVB opinion in the validation 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)	

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 :	Kayaja Ryang
Email ID ⁴ :	ryankayaja@gmail.com
Organisation: ⁵ :	Futures Inc.
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	GS23186 GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX	
Host country(ies)	Republic of Malawi			
Project Title	Mbaula za Makono, Banja la thanzi (Improved Cookstove, a health family) project – Dowa district			
Registry link	https://registry.goldstandard.org/projects/details/4859			
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	☒ Certified design	☐ Certified project	☐ Other <i>If other, specify here</i>
	dd/mm/yyyy	16/07/2025	dd/mm/yyyy	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

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		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	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	Requirements and Guidelines: Usage Rate Monitoring
	Version	2.0
	Paragraph	2.4.4

6.2 | Description of the deviation

Title	<i>Deviation from the continuous usage monitoring rule across seasons</i>
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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)
	The deviation for this requirement will be temporary, only changing the monitoring period for one season of this monitoring period.	
Relevant monitoring period, if applicable	Start date	01/06/2025(<i>inclusive of this date</i>)
	End date	21/08/2026(<i>inclusive of this date</i>)
Summarise the changes	The conditions within the Requirements and Guidelines: Usage Rate Monitoring v2.0 document states that the monitoring campaign shall be conducted for a minimum of 100 households for at least 90 consecutive days. It is the “consecutive” portion of that rule from which this project seeks temporary deviation for the project’s 2nd upcoming verification and issuance which has not yet commenced since monitoring is currently undergoing. The purpose of this project is the distribution of fuel-efficient improved cookstoves (ICS) in the Dowa District of the Republic of Malawi. The ICS distributed for this project are called TLC Rocket Stoves and they utilize wood as the fuel source. The baseline scenario is the continued use of three stone fire stoves for cooking in this region. The TLC Rocket Stove requires less fuelwood inputs, while producing fewer CO2 emissions compared to three stone fire cooking methods. A statistically significant number of these stoves were fitted with an Stove Usage Monitor (SUM) sensor device that will monitor stove utilization (including date and timestamps). This data is downloaded and used to calculate usage rate emission reductions calculations. The project monitoring plan outlines the two monitoring seasons per year defined by the agricultural cycle in Malawi influencing fuel consumption, particularly the harvesting period. Because the preliminary project data shows such variation in fuelwood consumption due to the availability/use of agricultural residues remaining after the agricultural harvest, it was determined that two monitoring periods should take place, one in each season (pre-harvest and post-harvest seasons) to account for this influential difference. A pre-harvest season usage monitoring period and a post-harvest season usage monitoring period will be calculated and applied to estimate emission reductions. This method means the usage monitoring data is more representative of the fuel usage throughout the year. The current monitoring plan, including the seasonality distinction explained above, has	

been approved by the VVB and Gold Standard as a permanent design change under the 1st verification (see most recent version of PDD attached entitled: "3.0-Revised_PDD_GS23186_Futures Inc._Malawi ICS_2026-04-27", design change section). In addition, the project is maintaining the annual monitoring frequency requirement under the GS4GG methodology.

The post-harvest season is characterized by the household's tendency to rely more on agricultural residues for cooking, resulting in reduced fuelwood use. This season's duration and temporality was determined from a desk-based literature review of harvest seasonality in the country, in addition to local household interviews where the respondents answered when they utilize more agricultural residue vs. fuelwood for cooking needs. The pre-harvest season is characterized by the household's tendency to rely more on harvested wood for cooking. The timing and duration of these seasons are:

- Pre-harvest season: mid-August to June (9.6 months of the year)
- Post-harvest season: June to mid-August (2.4 months of the year)

This seasonality is defined and implemented in the current monitoring plan for the project and will not be changed with the implementation of the deviation request extrapolated below.

The ongoing usage monitoring period for the current per-harvest season includes two installation batches, the first of which was deployed at the end of March and the second batch will be deployed in mid-May. To comply with the requirement of consecutive monitoring for 90 days, the monitoring would run into August (the post-harvest season) without the deviation. This means the current monitoring period would occur across the seasonally boundaries defined in the project's monitoring plan, leading to misrepresented data in the usage monitoring. It is important for the usage monitoring data to be as closely linked to the monitoring seasons to have the most representative data for emission reduction calculations.

The SUM sensors will remain on the same stoves from the start of monitoring (end of March) through the post-harvest season (June- August) and into the pre-harvest season again (September onwards), meaning that there will be no skewed data that could happen if the monitors were applied to different stoves/households when the initial monitoring period is resumed

	later in the year. The sensors will continuously collect data throughout both seasons. The request seeks approval to aggregate data collected between the end of march and the onset of the post-harvest season in June with additional usage monitoring data collected after the pre-harvest season resumes in September, such that the combined dataset may be used to meet the requirements of the current pre-harvest usage monitoring period. To ensure that the monitoring requirements of a minimum of 90 days of data is reached for the pre-harvest season, the usage sensor campaign will not end until October or November. There is no change in usage expected due to this deviation, since the sensors will remain on the stoves throughout. The SUM collects dates and time information as well as utilization, which will be used to distinguish the data between the seasons, allowing for separate analysis for emission calculation. This will also mean that data will not be double counted in the analysis, since the data will be allocated by date to one season or the other. Therefore, there is no overestimation of reductions and environmental integrity will be maintained. In addition, the deviation will not make any changes to SDG contributions, safeguarding principles and requirements, or host country regulation compliance.
Reason for deviation	A rule deviation is requested because of a delayed distribution of stove sensors leading to a delayed start to the monitoring period for the pre-harvest season. Stove sensor installation occurred in two batches: end of March (batch 1) and mid-May (batch 2) to meet the confidence precision requirements. This has caused the required continuous 90-day monitoring period for the pre-harvest season to occur run into the post-harvest season outlined in the monitoring plan and above. Seasonal differences in household behavior, fuel availability, cooking frequency, and stove utilization patterns between these periods are expected to materially affect stove usage consistency during the monitoring window. Without amendment of the monitoring period, the resulting dataset may not accurately represent stable or seasonally consistent stove utilization conditions, potentially introducing bias into monitored usage rates and associated emissions reduction calculations. The monitoring of usage during the pre-harvest season was due to the project developer waiting for the PA aligned methodology draft announcement (October 2025) to make certain that the

	monitoring plan and requirements aligned with any new usage survey and monitoring requirements. It wasn't until December 2025 when the draft methodology was published and April 2025 when the final version of the methodology was published that the project activities and monitoring plan could be finalized. This uncertainty resulted in a delay in sensor installment in the field and the start of the monitoring period.
Proposed resolution	The proposed resolution is to allow the required minimum 90-day continuous use monitoring period to be completed non-consecutively for this pre-harvest monitoring cycle to avoid crossing behavior and fuel consumption patterns. Specifically, monitoring would run from the end of March up until the post-harvest season (June- mid-August) and resume in the pre-harvest season (Mid-August onwards) until the minimum 90-day monitoring requirement is achieved. The sensors will therefore continue running during the entirety of the post-harvest season and then back into the pre-harvest season. This will mean monitoring will likely continue until October or November. This deviation request applies only to the consecutive timing requirement of the monitoring campaign and does not alter the intent, rigor, or methodological purpose of the usage monitoring survey requirements. The project will continue to monitor a statistically significant sample that meets the confidence precision requirements and will ensure it is carried out on at least 100 households using the same SUM installed throughout the entire monitoring duration. Any data that is collected from the post-harvest season (June to mid-August) will be allocated to the usage for that season. The proposed approach maintains monitoring integrity and preserves the representativeness of usage calculations by ensuring that the monitoring data remains aligned with the seasonal condition defined within the Gold Standard design-certified monitoring plan. Because the same sensors will remain installed on the same stoves and households continuously from the beginning of monitoring throughout both seasonal periods, there is no risk of introducing inconsistencies associated with changing monitored households or devices between monitoring phases. The SUM continuously record stove utilization, including date and time stamps, allowing data to be clearly separated by season and analyzed accordingly. As a result, the deviation will not impact the accuracy, conservativeness, or reliability of usage rate calculation or emission reduction estimates but instead will

	improve the representativeness of monitored data relative to actual seasonal cooking practices and fuel use patterns in the project area.						
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" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #00a69a; color: white;"> <th style="width: 50%;">Annual emission reduction/removal before applying deviation</th><th style="width: 50%;">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, please specify...	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	Although this deviation is pertaining to the applicability of the methodology, there will be no impacts to usage. It is a deviation solely from the “continuous” aspect of the 90-day usage monitoring rule for a particular season. The sensors will continue to remain on the household stoves throughout the pre-harvest season for 90 days in total, as well as cover the entire post-harvest season in the same batch of data.						

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.
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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