

FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: 15/05/2026

VERSION: 6.1

NEXT PLANNED UPDATE: 15/05/2028

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 help@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 Secretariat

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVQR-444
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. The CME is requested to apply the cap value of 80% for the non-compliance period (i.e., for the period 03/02/2023 to 02/02/2024 which the first round of testing was not conducted at least after six months from the start date) for considering the risk of contamination during the cholera outbreak.

The VVB shall assess whether other projects in the country encountered the same security issue and, if not, provide a justification explaining why this project was specifically affected.

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 verifying VVB shall, through appropriate means at disposal, evaluate that the project's compliance with the above-mentioned conditions and provide VVB opinion in the verification report.

4.2.4 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the CME 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 :	Anantha Karthik Rajagopalan
Email ID ⁴ :	anantha@upenergygroup.com
Organisation: ⁵	UpEnergy Group
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	GS11320	10963	11
Host country(ies)	Zambia		
Project Title	Community Carbon Safe Water Drinking Programme-VPA-11		
Registry link	https://registry.goldstandard.org/projects/details/3341		
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 ⁶	☐ Certified project ⁷	☐ Other <i>If other, specify here</i>
	dd/mm/yyyy	26/04/2023	dd/mm/yyyy	dd/mm/yyyy
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 ☐ Agriculture Activity Requirements			
	☐ Blue Carbon and Freshwater Wetlands Activity Requirements ☐ Engineered removals 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	DEVREQ-218		
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 CAR#1(c), Section 4.4 – Round 3 comment: "Although the IWTs were installed progressively, all installations were completed by mid-July 2023. Further, progressive installation does not provide grounds for extending water testing intervals beyond		

⁶ Design certification date

⁷ Date of first issuance approval by Gold Standard

	the stipulated annual monitoring frequency under the applied methodology. As previously stated, since the first monitoring period commenced on 03/02/2023, but the first round of water quality testing was conducted only between 04/03/2024 and 15/03/2024, the required annual testing frequency was not complied with. Accordingly, the CME shall submit a deviation request in accordance with the Deviation Request Requirements and Procedures v2.0."
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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	METHODOLOGY- Emission reductions from Safe Drinking Water Supply v.1.0
	Version	V2.1
	Paragraph	Section 4.1, a, Parameter ID – SDWS 18

6.2 | Description of the deviation

Title	Temporary deviation in the first monitoring timeline	
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)
Relevant monitoring period, if applicable	Start date	03/02/2023
	End date	02/02/2025
	☐ NA	
Summarise the changes	The project in Lusaka, Zambia, aims to provide Institutional Water Treatment (IWT) systems to public institutions through the installation of Water Purification Systems (WPS), ensuring access to safe drinking water while reducing greenhouse gas (GHG) emissions that would otherwise arise from the use of non-renewable biomass for water treatment purposes. Under this VPA, a total of 62 IWT systems were successfully installed in educational institutions, with the final installation completed on 18 July 2023 during the current monitoring period (MP). The first monitoring period spans two years, from 03/02/2023 to 02/02/2025. Accordingly, the first year of the monitoring period covers 03/02/2023 to 02/02/2024. As per the applied methodology and the monitoring plan of the design certified VPA DD, the monitoring frequency for the parameter SDWS-18 (◆_{q,y} /Ongoing water quality indicated as	

the fraction of the samples that pass microbial quality standard requirements specified in relevant microbial quality standard for drinking water of the host country. In case a national standard is not available, the water quality shall comply with WHO Guideline values for verification of microbial quality i.e., all water directly intended for drinking must not have detectable E.Coli in any 100 ml sample i.e., less than 1 Colony Forming Unit (CFU) of E.Coli /100 ml.) is 'Annual'. However, due to circumstances explained below, the monitoring activity could not be completed within the stipulated timeline, and therefore a temporary deviation is being requested for the first year annual monitoring requirement.

A severe cholera outbreak, declared in Lusaka in October 2023, escalated into a critical public health emergency by January 2024 — the worst in Zambia's recent history. The outbreak peaked in January 2024 with Lusaka as the national epicentre, accounting for approximately 75% of all national cases. By late January 2024, over 14,900 cases and 560 deaths had been reported across 62 districts nationwide, with a case fatality rate of 3.8%, exceeding WHO thresholds. The Ministry of Health designated the National Heroes Stadium as an emergency Cholera Treatment Centre on 04 January 2024, with a capacity of over 1,000 patients, and a national oral cholera vaccination campaign was launched on 16 January 2024 (WHO Regional Office for Africa: <https://www.afro.who.int/countries/zambia/news/zambia-rallying-control-cholera-outbreak>).

This outbreak had direct and documented operational consequences on the project's monitoring activities. All WASH-related field personnel were mandatorily redeployed to support the national cholera emergency response — the same workforce required to conduct project monitoring activities. Active public health advisories discouraged all non-essential entry into communities, particularly the dense peri-urban areas of Lusaka where the project's institutional beneficiaries are located, making it operationally impossible for the project team to conduct field monitoring within the stipulated timeline (Pan African Medical Journal source (Kateule et al., 2024): <https://www.panafrican-med-journal.com/content/article/48/19/full/>).

As conditions stabilised sufficiently to permit safe field access and institutional entry, the monitoring surveys for Vintage 2023–24 were initiated on 04/03/2024 and completed on 15/03/2024. Since the cholera epidemic and its associated restrictions persisted beyond the end of the first-year monitoring timeline, the annual monitoring could only be undertaken shortly thereafter. By late February 2024, cholera cases in Lusaka had begun declining significantly from their January peak, with epidemiological data confirming a gradual and sustained decrease in cases towards late February and into early March 2024 (Tropical Medicine and Health, Geospatial analysis of cholera outbreak in Lusaka, Zambia, 2023–2024: <https://tropmedhealth.biomedcentral.com/articles/10.1186/s41182-025-00718-4>).

As conditions stabilised sufficiently to permit safe field access and the resumption of normal WASH operations, monitoring surveys for Vintage

	2023–24 were initiated at the earliest practicable date on 04/03/2024 and completed on 15/03/2024. Therefore, a temporary deviation from the first-year annual monitoring timeline is being sought.
Reason for deviation	The cholera outbreak that escalated into a national public health emergency in Lusaka, Zambia, during January–February 2024 constitutes a force majeure circumstance that was entirely beyond the control of the project proponent. The outbreak directly prevented the timely completion of the first year annual monitoring for parameter SDWS-18 for the following reasons: 1. WASH Personnel Redeployment The monitoring of IWT systems under this project requires trained WASH field personnel to conduct water quality testing, usage surveys, and site inspections at the 62 institutional project locations. During the peak of the cholera emergency in January–February 2024, all available WASH-related field personnel in Lusaka were mandatorily redeployed by authorities to support the national cholera response — including water quality testing, chlorination of water sources, and community sanitation interventions. This workforce redeployment was not discretionary; it was a consequence of a nationally declared public health emergency, leaving no qualified personnel available to conduct routine project monitoring activities. 2. Community Access Restrictions Active public health advisories issued during the outbreak period discouraged all non-essential entry into the peri-urban communities of Lusaka where the project's 62 institutional sites are located. These restrictions were enforced to contain the spread of cholera and protect both community members and field workers. Conducting monitoring visits under these conditions would have been contrary to prevailing public health guidance and unsafe for field teams. 3. Nature of the Project It is particularly noteworthy that this is a safe drinking water project operating in the very communities most severely affected by a waterborne disease epidemic. The cholera outbreak is scientifically and directly linked to inadequate access to safe drinking water — the precise problem this project seeks to address. The diversion of all WASH resources to emergency response was therefore an unavoidable consequence of the crisis, uniquely impacting projects of this nature more than any other project type. 4. No Impact on Data Integrity or ER Volume The deviation is strictly limited to the timing of monitoring commencement and has no bearing on the integrity of the monitoring data collected or the emission reductions generated during the first monitoring year. Monitoring was deferred, not cancelled, and was conducted comprehensively from 04/03/2024 to 15/03/2024 covering all parameters required under the annual monitoring schedule. The delay of approximately 31 days does not affect the representativeness of the data for the annual monitoring period.

Proposed resolution	The project proponent respectfully requests that the Gold Standard approve a temporary deviation from the first year annual monitoring timeline for parameter SDWS-18, acknowledging that the monitoring surveys for Vintage 2023–24 were initiated on 04/03/2024 and completed on 15/03/2024, in place of the stipulated deadline of 02/02/2024. The project proponent confirms the following: 1. Force Majeure Circumstance The delay was caused solely by the cholera public health emergency prevailing in Lusaka, Zambia, during January–February 2024 — a circumstance entirely beyond the control of the project proponent and independently verified by WHO, UNICEF, and the Zambia Ministry of Health. The project proponent could not have reasonably anticipated or mitigated this emergency. 2. Earliest Practicable Date By late February 2024, cholera cases in Lusaka had begun declining significantly from their January peak, with epidemiological data confirming a gradual and sustained decrease in cases towards late February and into early March 2024 (Tropical Medicine and Health, Geospatial analysis of cholera outbreak in Lusaka, Zambia, 2023–2024: https://tropmedhealth.biomedcentral.com/articles/10.1186/s41182-025-00718-4). As conditions stabilised sufficiently to permit safe field access and the resumption of normal WASH operations, monitoring surveys for Vintage 2023–24 were initiated at the earliest practicable date on 04/03/2024 and completed on 15/03/2024. Monitoring was initiated at the earliest practicable date once conditions stabilised sufficiently to permit safe field access and the availability of WASH field personnel. The surveys were completed within 11 days of commencement, demonstrating the project proponent's commitment to fulfilling monitoring obligations at the first available opportunity. 3. No Impact on Project Integrity The deviation does not affect any of the following: • Project design or methodology applicability • Additionality determination • Safeguarding principles or SDG assessments • Regulatory compliance • Annual emission reduction volumes for the first monitoring year Although the first-year monitoring activity was completed shortly after the prescribed timeline, all monitoring activities were conducted in full compliance with the monitoring requirements, sampling procedures, and data collection provisions of the applied methodology and the registered monitoring plan. Furthermore, the project proponent has applied conservative approaches in the calculation of emission reductions. Specifically, conservative per-student daily water consumption values, lower than or equal to the applicable methodological defaults, have been applied where appropriate. In addition, actual school operating days were used, with deductions made for non-operational periods, including maintenance-related downtime, thereby ensuring that emission
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	reduction estimates remain conservative and do not result in over-crediting. 4. Temporary and Non-Recurring Nature This deviation is strictly temporary and limited to the first year annual monitoring of the first monitoring period. The project proponent confirms that all subsequent annual monitoring activities will adhere to the required timeline without deviation. No systemic or structural changes to the monitoring plan are required or proposed. 5. Data Completeness All parameters required under the annual monitoring schedule, including parameter SDWS-18, were monitored comprehensively during the surveys conducted from 04/03/2024 to 15/03/2024. The monitoring data collected is complete, representative, and fit for purpose for the annual verification of the first monitoring year.				
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>28,569 tCO₂e</td><td>28,569 tCO₂e</td></tr> </tbody> </table> ☐ any other matrix, please specify... ☒ NA	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	28,569 tCO ₂ e	28,569 tCO ₂ e
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				
28,569 tCO ₂ e	28,569 tCO ₂ e				
Summary of the impact	The deviation has no material impact on any aspect of the project. The sole deviation is the timing of the monitoring event — not the nature, scope, or quality of monitoring conducted. The IWT systems continued to operate throughout the monitoring period, emission reductions are unaffected, and all data collected is complete and representative of the first monitoring year. The deviation has no bearing on methodology applicability, additionality, safeguarding, SDG assessments, or regulatory compliance. This is a one-time deviation arising from an unprecedented public health emergency and is not expected to recur.				

1. Background Information:

The project in the Lusaka province of Zambia focused on distributing and providing institutional water treatment to institutional users with a water purification system to provide safe drinking water and reduce/avoid greenhouse gas emissions from the burning of nonrenewable woody biomass and/or charcoal for water treatment.

The VPA is implemented by Community Carbon & UpEnergy Group is the Coordinating and Managing Entity of the PoA. Community Carbon has implemented the programme in partnership with local partners and ensures the last-mile distribution/installation of the water purification systems to the beneficiaries.

2. Deviation detail

VPA 11 (GS11320) involves the promotion and distribution of Water Purification Systems, specifically Institutional Water Treatment technologies, to provide safe drinking water to students and institutional staff in Lusaka Province, Zambia, while reducing greenhouse gas emissions associated with the use of non-renewable woody biomass for water treatment. The project thereby contributes to reduced consumption of non-renewable fuel and associated deforestation impacts.

The VPA includes the marketing, distribution, and awareness creation of WPS for public institutions across Lusaka Province, Zambia. Under this VPA, a total of 62 IWT systems were successfully distributed and installed in educational institutions during the current monitoring period.

The first monitoring period of the VPA spans two years, from 03/02/2023 to 02/02/2025. Accordingly, the first year of the monitoring period covered 03/02/2023 to 02/02/2024, during which annual monitoring of parameter SDWS-18 was required to be completed in accordance with the applied methodology.

However, during the first-year monitoring period, Lusaka Province experienced a severe cholera outbreak that significantly affected the project's ability to conduct field monitoring activities within the prescribed timeline. The outbreak, which was declared in October 2023, escalated into a major public health emergency by January 2024 and became the worst cholera outbreak recorded in Zambia in recent years. Lusaka was the national epicentre of the outbreak, accounting for approximately 75% of all reported cases across the country. By late January 2024, more than 14,900 cases and 560 deaths had been reported nationwide, prompting extensive emergency response measures by the Government of Zambia and public health authorities.

The outbreak had direct operational consequences on the project's monitoring activities. Personnel involved in Water, Sanitation and Hygiene activities were required to support cholera response efforts, while public health advisories and emergency measures restricted non-essential movement and access to beneficiary institutions and surrounding communities. As a result, the project developer was unable to safely and effectively conduct the planned annual monitoring surveys for parameter SDWS-18 within the required timeline. These circumstances were beyond the control of the project developer and prevented the commencement of monitoring activities before the end of the first-year monitoring period.

Once the public health situation had sufficiently stabilised and access to project sites became operationally feasible, the monitoring surveys for Vintage 2023–24 were initiated on 04/03/2024 and completed on 15/03/2024. The monitoring surveys for Vintage 2024–25 were subsequently conducted between 05/03/2025 and 18/03/2025. Despite the delayed commencement of the first-year monitoring activities, all monitoring activities were completed in accordance with the applicable methodological requirements, including the prescribed sampling approach and survey procedures.

As the cholera outbreak and its associated restrictions extended beyond the end of the first-year monitoring timeline, the annual monitoring of parameter SDWS-18 could only be conducted shortly thereafter. Therefore, this deviation request is being submitted for consideration and acceptance of the delayed first-year monitoring timeline for parameter SDWS-18. The delay was solely attributable to the exceptional public health emergency caused by the cholera outbreak and did not impact the quality, reliability, transparency, or integrity of the monitoring process or the data collected.

6.3 | VVB information

Is a VVB opinion on the deviation request required?

VVB opinion shall be included, where required by the requirements under [Deviations Request Requirements and Procedures](#) or request is submitted by the VVB.

Yes ☐ No ☒

If answer is yes, fill the information in section 6.4 below.

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
6.1	15.05.2026	Editorial and structural changes to the template
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