FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: **20/05/2026**
VERSION: **6.1**
NEXT PLANNED UPDATE: **15/05/2028**

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 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	DEVRQ-457
Date of decision	17/07/2026
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 approved. The first verification shall be conducted once the conditions permit and no later than 09 October 2027.

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

The CME shall continuously monitor WHO / US CDC outbreak status and schedule/complete the physical site visit at the earliest date at which the VVB can travel and work safely.

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 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 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] :	Evan Thomas, Chief Executive Officer
Email ID[4] :	evan.thomas@virridy.com
Organisation:[5]:	Virridy Carbon LLC
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		GS13143	Real-case VPA-1: GS13144
Host country(ies)	Democratic Republic of the Congo — VPA1 sites in Bukavu and surrounding areas, South Kivu Province (eastern DRC)		
Project Title	PoA GS13143: Asili Mazingira Bora Safe Water 1st Real Case VPA GS13144: GS13143 VPA-1 Democratic Republic of the Congo Asili Mazingira Bora Safe Water Program		
Registry link	PoA GS13143: https://registry.goldstandard.org/projects/details/4837 1st Real Case VPA GS13144: https://registry.goldstandard.org/projects/details/4838		

[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

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[6]	☐ Certified project[7]	☐ Other *If other, specify here*
	dd/mm/yyyy	08/08/2025	*dd/mm/yyyy*	*dd/mm/yyyy*

Applied version of Standard	☒ GS4GG				
	☐ 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 ☐ Agriculture Activity Requirements ☐ Blue Carbon and Freshwater Wetlands Activity Requirements ☐ Engineered removals Activity Requirements ☐ Other *Insert name here*

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	DEVRQ-82 – 'Extraordinary measures for site visits in response to military violence risk' (remote audit for validation of PoA GS13143

[6] Design certification date
[7] Date of first issuance approval by Gold Standard

	and first real-case VPA GS13144); conditionally approved 24/02/2025.		
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		
	The Deviation Request No. DEVRQ_82 conditionally approved on 24/02/2025 by the GS, section 2.2.3 "Directions for the VVB, if applicable" mentions: "(3) The verifying VVB shall conduct a physical site visit at the time of first verification of the VPA". A FAR was raised in the Validation Report that the above shall be verified by the VVB during the first verification of the VPA-1. Hence, the FAR remains open in the FVR to be checked in the first verification. Reference: Design Certification (Validation) Report for VPA GS project activities, titled "VPA_FValR_Asili_DRC_GS_clean", version 5.0, dated 19/02/2026, page 153 and 176. This is relevant to the current deviation request as it seeks a one-year extension of that on-site first verification for the force-majeure reasons set out in section 6.2. below.		

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	Site Visit and Remote Audit Requirements and Procedures (Core Document) — primary; read together with Principles & Requirements (Core Document), Annex B – Conflict and Emergency Zones.
	Version	Site Visit and Remote Audit Requirements and Procedures v2.0 (30.05.2023); Principles & Requirements v2.1 (31.01.2025).
	Paragraph	Site Visit and Remote Audit Requirements §3.1.1 (physical site visit within two years of project start date) and §3.2.2 (physical site visit mandatory at first verification); Principles & Requirements Annex B §1.1.1 and §2.1.1–2.1.9.

6.2 | Description of the deviation

Title	One-year extension of the mandatory on-site first verification due to the continuation of military violence and Ebola emergency in DRC	
	☒ Temporary	☐ Permanent

Confirm the nature of changes related to deviation	(e.g. not expected to occur beyond one monitoring period)	(e.g. deviation from requirements prior to submission for certification)
Relevant monitoring period, if applicable	Start date	10/10/2024
	End date	To be determined based on the evolution of the county's situations
	☐ NA	
Summarise the changes	This deviation concerns the TIMING of the mandatory physical (on-site) first verification of the real-case VPA GS13144 under the GS13143 Asili Mazingira Bora Safe Water Program (PoA), located in Bukavu and surrounding areas of South Kivu Province, eastern Democratic Republic of the Congo (DRC). Under the Site Visit and Remote Audit Requirements and Procedures (v2.0), §3.1.1 requires the VVB to conduct a physical site visit within two years of the project start date, and §3.2.2 makes a physical site visit mandatory at the first verification of a project. The project start date (commissioning of the first water kiosk, Kiosque Igoki) is 10 October 2024; the two-year deadline for the first physical site visit therefore falls on 09 October 2026. The Project Developer requests a ONE-YEAR EXTENSION of this deadline — from 09 October 2026 to 09 October 2027 — within which to undertake the mandatory on-site first verification. No other requirement is altered: the first verification will still include a full physical site visit; only its timing is deferred. The deviation is temporary and is driven entirely by force-majeure conditions (active armed conflict and a declared Ebola public-health emergency) that make safe travel to, and audit work within, the project area not foreseeable feasible during 2026.	
Reason for deviation	Two concurrent, independently verified emergencies in the project region make it unfeasible to safely conduct an on-site first verification within the §3.1.1 two-year window. Both are entirely outside the control of the Project Developer. 1) MILITARY VIOLENCE / SECURITY CONCERNS (Security situation in eastern DRC remains unstable, particularly in the provinces of North Kivu (including the city of Goma), South Kivu (including the city of Bukavu), among others). The M23 armed group, reported by the UN to be supported by Rwandan Defence Forces, captured Goma	

	(January 2025) and Bukavu (February 2025).[8] Bukavu — where the project's water kiosks and beneficiary households are located for this VPA-1— now serves as M23's military headquarters in South Kivu, with clashes north and south of the city reported as recently as June 2026.[9] More than 500,000 people have been displaced in South Kivu since December 2025, and ceasefire (Doha process) violations continue.[10] The security situation in eastern DRC remains unstable. Armed groups are active and intercommunal violence can affect the political, security and humanitarian situation. Large numbers of civilians remain displaced as a result of the conflict. Acts of violence, including killing, rape and looting continue against civilians. There are continued reports of towns in eastern DRC being attacked by or falling under temporary control of armed groups. There are continued reports of attacks and kidnappings, including against staff from NGOs and international organisations. Government travel advisories prohibit travel to the area[11]: • UK FCDO advises against all travel to Bukavu / South Kivu; routes out of Goma and Bukavu are limited and may change at short notice — https://www.gov.uk/foreign-travel-advice/democratic-republic-of-the-congo/regional-risks (visited on 19/06/2026). • US Department of State — Level 4 "Do Not Travel" advisory for the DRC —

[8] M23 captured Goma in late January 2025 and Bukavu on 15 February 2025: The New Humanitarian, "Goma capture sparks fears of deeper regional conflict as Rwanda-backed rebels (M23) push south" (31 January 2025), https://www.thenewhumanitarian.org/news-feature/2025/01/31/drc-goma-capture-sparks-fears-deeper-regional-conflict-rwanda-backed-rebels-m23. The UN Group of Experts on the DRC reported to the Security Council that thousands of Rwandan Defence Force troops were deployed alongside M23: Al Jazeera, "UN experts cast blame on Rwanda and Uganda: what are they doing in DRC?" (18 July 2025), https://www.aljazeera.com/news/2025/7/18/un-experts-cast-blame-on-rwanda-and-uganda-what-are-they-doing-in-drc; see also UN Security Council, Press Statement on the Democratic Republic of the Congo, https://press.un.org/en/2025/sc15982.doc.htm.

[9] Critical Threats Project (American Enterprise Institute / Institute for the Study of War), Congo War Security Review, 12 June 2026 — M23 holds Bukavu as its South Kivu headquarters and M23–Wazalendo clashes north of Bukavu in Kabare district, near Kahuzi-Biega National Park, were reported on 1 June 2026: https://www.criticalthreats.org/briefs/congo-war-security-review.

[10] UN News, "M23 rebels: UN sees progress in talks but warns violence persists" (February 2026), https://news.un.org/en/story/2026/02/1166899.

[11] UK FCDO, Foreign travel advice — Democratic Republic of the Congo, regional risks (advises against all travel to South Kivu / Bukavu), https://www.gov.uk/foreign-travel-advice/democratic-republic-of-the-congo/regional-risks; US Department of State, DRC Travel Advisory — Level 4: Do Not Travel, https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/democratic-republic-of-the-congo-travel-advisory.html; Government of Canada, Travel advice and advisories — Democratic Republic of Congo (avoid all travel), https://travel.gc.ca/destinations/congo-kinshasa; Centre for Strategic and Defence Studies, Africa (CSDS Africa), DRC risk report, https://csdsafrica.org/democratic-republic-congo-risk-report/.

	https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/democratic-republic-of-the-congo-travel-advisory.html (visited on 19/06/2026). • Government of Canada travel advice — avoid all travel — https://travel.gc.ca/destinations/congo-kinshasa (visited on 19/06/2026). • Centre for Strategic and Defence Studies, Africa (CSDS Africa) – Travel to Goma, Bukavu and to the regions of N'djili and Kimbanseke in Kinshasa are strictly forbidden to foreign nationals – https://csdsafrica.org/democratic-republic-congo-risk-report/ (visited on 19/06/2026). • Critical Threats, Congo War Security Review (visited 16 June 2026) — https://www.criticalthreats.org/briefs/congo-war-security-review 2) EBOLA PUBLIC-HEALTH EMERGENCY (Ebola Bundibugyo virus). On 15 May 2026 the DRC Ministry of Health declared the country's 17th Ebola outbreak; on 17 May 2026 the WHO Director-General declared it a Public Health Emergency of International Concern (PHEIC) for the DRC and Uganda.[12] As of 19 June 2026 WHO reported 896 confirmed cases and 232 deaths in the DRC (915 cases and 234 deaths including Uganda); by 22 June 2026 the DRC Ministry of Health reported the outbreak had surpassed 1,003 confirmed cases and 254 deaths — making it the second-largest Ebola outbreak on record after the 2014–2016 West Africa epidemic, and the fastest-growing to date. Ituri is the most affected province (about 91% of confirmed cases), with further cases reported in North Kivu and South Kivu. The Bundibugyo species has no approved vaccine or specific treatment — the two licensed Ebola vaccines target only the Zaire species, with no established cross-protection — and the case-fatality ratio in this

[12] The DRC Ministry of Health declared the country's 17th Ebola outbreak on 15 May 2026; the WHO Director-General determined it a Public Health Emergency of International Concern (PHEIC) on 17 May 2026: WHO, "Epidemic of Ebola disease in the Democratic Republic of the Congo and Uganda determined a public health emergency of international concern", 17 May 2026, https://www.who.int/news/item/17-05-2026-epidemic-of-ebola-disease-in-the-democratic-republic-of-the-congo-and-uganda-determined-a-public-health-emergency-of-international-concern. See also US Embassy Kinshasa, Health Alert (19 May 2026), https://cd.usembassy.gov/health-alert-update-u-s-embassy-kinshasa-may-19-2026/.

	outbreak is about 26%.[13] WHO has described a "catastrophic collision of disease and conflict", with insecurity and attacks on health facilities making containment in the east a difficult task[14]: • WHO Disease Outbreak News (Ebola disease caused by Bundibugyo virus, Democratic Republic of the Congo & Uganda) (visited on 23/06/2026) — https://www.who.int/emergencies/disease-outbreak-news/item/2026-DON608 • WHO PHEIC determination (dated 17 May 2026) — https://www.who.int/news/item/17-05-2026-epidemic-of-ebola-disease-in-the-democratic-republic-of-the-congo-and-uganda-determined-a-public-health-emergency-of-international-concern • UN News, "Ebola outbreak in DR Congo collides with conflict and hunger, WHO warns" (dated 27 May 2026) — https://news.un.org/en/story/2026/05/1167592 • US CDC — Ebola Outbreak: Current Situation — (visited on 25/06/2026) https://www.cdc.gov/ebola/situation-summary/index.html • US Embassy Kinshasa — Health Alert (dated 19 May 2026) — https://cd.usembassy.gov/health-alert-update-u-s-embassy-kinshasa-may-19-2026/ • CIDRAP, University of Minnesota — "Ebola outbreak in DR Congo tops 1,000 cases, at least 254 dead" (dated 22 June 2026) — https://www.cidrap.umn.edu/ebola/ebola-outbreak-dr-congo-tops-1000-cases-least-254-dead Gold Standard's own rules expressly recognise these circumstances. Principles & Requirements (v2.1) Annex B – Conflict and Emergency Zones applies to projects "located in conflict zones, refugee camps or areas that pose high risk to life and/or health"; its footnote 3

[13] WHO, Disease Outbreak News — "Ebola disease caused by Bundibugyo virus, Democratic Republic of the Congo & Uganda" (2026-DON608, 19 June 2026), https://www.who.int/emergencies/disease-outbreak-news/item/2026-DON608 (896 confirmed cases and 232 deaths in the DRC as of 17 June 2026; 915 cases and 234 deaths including Uganda; case-fatality ratio approximately 26%; no approved vaccine or specific treatment for Bundibugyo virus). For the 1,003 cases / 254 deaths reported by the DRC Ministry of Health as of 22 June 2026 — the second-largest Ebola outbreak on record — see CIDRAP (University of Minnesota), "Ebola outbreak in DR Congo tops 1,000 cases, at least 254 dead" (22 June 2026), https://www.cidrap.umn.edu/ebola/ebola-outbreak-dr-congo-tops-1000-cases-least-254-dead.

[14] UN News, "Ebola outbreak in DR Congo collides with conflict and hunger, WHO warns" (27 May 2026), https://news.un.org/en/story/2026/05/1167592. See also US CDC, Ebola Outbreak: Current Situation, https://www.cdc.gov/ebola/situation-summary/index.html.

	explicitly includes "severe disease outbreak in a country or a part of country and where advisories are issued by national governments / health departments notifying people against travel". Both triggers — active armed conflict and a Public Health Emergency of International Concern level (PHEIC-level) disease outbreak under standing government travel advisories — are squarely met here. These conditions could not have been anticipated or scheduled around and are entirely outside the Project Developer's control.
Proposed resolution	PRIMARY REQUEST — ONE-YEAR EXTENSION. Grant a one-year extension of the §3.1.1 physical-site-visit deadline for the first verification, from 09 October 2026 to 09 October 2027. The first verification will be conducted once the conditions permit and no later than 09 October 2027. The Project Developer commits to: (a) continuously monitoring WHO / US CDC outbreak status; (b) scheduling and completing the physical site visit at the earliest date at which the VVB can travel and work safely; and (c) transparently reporting this deviation and its decision in the verification documentation (per DEVRQ-82 §4.2.3). CONTINGENCY — ANNEX B OBJECTIVE OBSERVER. Should the conflict and/or the Ebola PHEIC still preclude a VVB site visit as the extended deadline of 09 October 2027 approaches, the Project Developer requests, in the alternative, to apply Principles & Requirements Annex B (Conflict and Emergency Zones, §§1.1.1 and 2.1.1–2.1.9): combine a desk-review verification by the VVB with an on-site appraisal by a Gold Standard-selected Objective Observer retained by the Project Developer. ACCURACY, COMPLETENESS AND CONSERVATIVENESS. Neither pathway waives the on-site requirement — it is deferred (primary) or substituted by an independent in-person appraisal (contingency). The verification opinion continues to rely on accredited VVB judgement and proven remote-audit techniques (Site Visit and Remote Audit Requirements §4.1 and Annexes 1–2).
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: *XYZ* tCO_2e Annual emission reduction/ removal after applying deviation: *XYZ* tCO_2e ☐ any other matrix, please specify… ☒ NA
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.
The requested extension affects only the timing of the on-site first verification. It does not change the project design, monitoring plan, methodology, additionality, local stakeholder consultation, safeguarding outcomes, SDG contributions, regulatory compliance, or the estimated emission-reduction volume (annual average 34,106 tCO2e), which remain exactly as design-certified on 08/08/2025. The physical site visit is deferred, not waived; assurance is preserved because no issuance will occur until the on-site verification (or Annex B Objective-Observer appraisal) is completed and the VVB has issued its verification opinion. The deviation is therefore conservative and has no impact on the integrity of the credited reductions.	

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.*)

- DEVRQ_82
- VPA_FValR_Asili_DRC_GS_clean

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