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

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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-469
Date of decision	06/08/2026

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

Gold Standard has reviewed the request for a deviation from Paragraph 4.1.50(b) of the GS4GG Principles and Requirements v2.1 to allow inclusion of stoves distributed from 11 December 2024 under VPA GS23586, despite the VPA listing submission being completed on 9 March 2026, beyond the one-year deadline. The request relates to a delay arising from the intended project developer's unsuccessful registry account application and the subsequent transfer of project development responsibility to BURN under PoA GS10789.

Gold Standard notes that this was an exceptional case involving legal, compliance, and KYC/AML considerations related to the original registry account applicant. The registry account application underwent an extensive cross-functional review involving multiple Gold Standard functions before a final decision could be reached.

The prolonged timeline was not the result of routine administrative delays or an account opening process taking longer than expected. Rather, the additional time was required to determine whether it was appropriate for Gold Standard to proceed with the applicant, based on issues identified during the review process.

Considering the exceptional circumstances of this case and recognizing that the delay was materially linked to an unusually lengthy internal assessment process that was necessary to reach a final decision on the registry account application, Gold Standard approves the requested deviation and allows inclusion of eligible stoves distributed from 11 December 2024 under VPA GS23586.

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

The CME shall:

1. Maintain clear evidence demonstrating continuity of project implementation from 11 December 2024 onward and the transfer of project development authority and associated rights from ECS to BURN.

2. Ensure that all stoves included under the VPA comply with all other applicable Gold Standard requirements.
3. Document this deviation, it's decision and implications in relevant project documentation

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

During validation and subsequent verification activities, the VVB shall:

1. Confirm that only eligible stoves distributed under the approved project activity are included.
2. Verify that the transfer of project development responsibility and associated rights has been appropriately documented.
3. Confirm that all other applicable requirements remain fully met and that no other deviations from Gold Standard requirements have occurred.

4.2.4 | Directions for the Gold Standard, if applicable

NA

4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances?[1]	☐ Yes ☒ No
Does this decision set a precedent for future projects with similar circumstances?[2]	☐ Yes ☒ No
Precedent details (if applicable to other activities) NA	

[1] If this is marked yes, this means that any other project (PoA/VPA/PA) in similar situation may apply the decision of this deviation to their project as well. The project developer/VVB may quote this deviation decision in the relevant certification documents. This is relevant to only the projects which have already entered the certification cycle with GS4GG.

[2] If this is marked yes, it means the decision is valid to all the future projects which will enter the certification cycle with the similar situation. This is relevant to all the projects which are not yet design certified with GS4GG or have not submitted their documents for preliminary review yet.

5| Deviation Request Details

To be completed by the entity requesting deviation - (Project Developer/Coordinating and Managing Entity and/or VVB)

5.1 | Submitted by

☐ Project developer
☒ CME
☐ VVB
☐ Other (specify…)

5.2 | Details of the entity and its representative submitting the form

Item	Information
Name[3] :	Nathan Gachugi
Email ID[4] :	nathan.gachugi@burnmfg.com
Organisation:[5]:	BURN Manufacturing Co.
Are you an authorized project participant as per the cover letter submitted for this activity?	☒ Yes ☐ No

5.3 | Background information

Type	☐ Project activity	☐ PoA GSXXXX	☒ VPA
GS ID	*GSXXXX* *GSXXXX*	*GS XXXX* *GS XXXX*	*GS23586* *GS XXXX*
Host country(ies)	Republic of Malawi		
Project Title	GS10789-GS10790-RVPA-106: Efficient and Clean Cooking for households in Malawi		
Registry link	**https://assurance-platform.goldstandard.org/project-documents/GS12283**		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below *Insert text here*		
Certification Status and corresponding	☐ Listed	☐ Certified design	☐ Certified project	☐ Other

[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

date of latest status				*If other, specify here*
	dd/mm/yyyy	*dd/mm/yyyy*	*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 ☐ 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	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 *Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number*		

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	Principles & Requirements
	Version	V2.1
	Paragraph	para 4.1.50 (b)

6.2 | Description of the deviation

Title	Deviation Request for Inclusion of Stoves Distributed Prior to VPA Listing Submission	
Confirm the nature of changes related to deviation	☐ Temporary not expected to occur beyond one monitoring period	☒ Permanent (e.g. deviation from requirements prior to submission for certification)
	Deviation to allow inclusion of all stoves distributed from 11/12/2024 under the VPA despite listing submission beyond the one-year deadline	
Relevant monitoring period, if applicable	Start date	
	End date	
Summarise the changes	ECOA and ECS had a pre-existing MoU to develop a VPA under the PoA GS 10789. It was initially agreed that the VPA will be hosted on ECS' registry account, however, due to ECS not being able to open a registry account BURN assumed full project development authority and wishes to submit the VPA under PoA GS10789. The ECS registry account opening process caused a delay beyond the one-year listing deadline from the VPA start date (11/12/2024), approval is sought to include all stoves distributed from the project start date under the VPA.	
Reason for deviation	Rationale for the Request **1. Inability of ECS to Continue as Project Developer** The project activity was initially planned to be implemented by ECS, which commenced stove distribution from 11/12/2024 with the intention of developing the activity as a standalone Gold Standard project under its own registry account. Burn acted as the CME and technology manufacturer and supported distribution and project management as a VPA implementer Accordingly, ECS initiated the process of obtaining a Gold Standard Impact Registry account on 27/03/2025. However, after almost a year of waiting, the registry account application was ultimately rejected by Gold Standard on 11/02/2026, making ECS unable to continue as the project developer or registry account holder. Since the activity was always intended to be developed as a carbon project and remained fully aligned with the scope and eligibility requirements of PoA GS10789, BURN, as the Coordinating/Managing Entity (CME) of the PoA, assumed full project development authority and responsibility for registering the activity under the existing PoA structure. Following Gold Standard's clarification that legal ownership of the project and associated carbon rights could be formally transferred to BURN through a novation agreement or asset transfer agreement, BURN proceeded to incorporate the activity as a regular case VPA under PoA GS10789 (VPA ID: GS23586). **2. Delay in VPA Listing Submission Due to Project Developer Transition**	

	As per Gold Standard Principles & Requirements v2.1, Paragraph 4.1.50(b), a VPA must be submitted for listing within one year of the VPA start date. In this case, the VPA start date is 11/12/2024, while the listing submission was completed on 09/03/2026, resulting in a delay beyond the prescribed timeline. This delay was caused by the original implementation arrangement, where the project activity was initially planned and commenced by ECS, which started stove distribution from 11/12/2024 with the intention of developing the project under its own Gold Standard account. **3. Continuity of Genuine Project Activity** The project activity remained continuous, genuine, and fully aligned with the scope and objectives of PoA GS10789 throughout the implementation period. The delay was purely administrative and procedural, arising from the unsuccessful registry account application and the subsequent transition of project ownership and development responsibility. **4. Principle of Fairness and Environmental Integrity** Excluding stoves distributed during this period would result in the omission of legitimate project activities implemented in good faith and would create an unfair loss of emission reductions solely due to administrative constraints beyond the control of the project participants. The requested deviation does not compromise environmental integrity, additionality, monitoring, or verification requirements. It only seeks acceptance of the original implementation start date and inclusion of the associated distributed stoves under the VPA. 5. **Request for Approval** Considering the exceptional circumstances surrounding the failed registry account application of ECS and the necessary transition of project development authority to BURN, we respectfully request Gold Standard to approve this deviation and allow inclusion of all stoves distributed from 11/12/2024 under the VPA submitted by BURN under PoA GS10789.
Proposed resolution	We request Gold Standard to approve a deviation from Paragraph 4.1.50(b) of the Gold Standard Principles & Requirements v2.1 and allow inclusion of all stoves distributed from 11/12/2024 under regular case VPA GS23586 submitted by BURN under PoA GS10789, despite the listing submission being completed beyond the one-year deadline.
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: Annual emission reduction/ removal after applying deviation *XYZ* tCO_2e: *XYZ* tCO_2e ☐ any other matrix,
Summary of the impact	Describe the impact of the deviation on each relevant aspect of the project as selected above. Please substantiate the impact assessment with relevant and verifiable data/information.

- **Environmental Integrity & Conservativeness:**

The deviation does not affect additionality, monitoring, or environmental integrity and only allows inclusion of genuine project activities implemented from 11/12/2024, ensuring no overestimation of emission reductions.

- **Administrative & PoA Impact:**

Granting this deviation will not impact the structure or compliance of PoA GS10789 and only regularizes the project developer transition from ECS to BURN under regular case VPA GS23586.

- **Market & Financial Impact:**

Approval will prevent loss of eligible emission reductions and associated carbon revenues for already distributed stoves, supporting project continuity and long-term clean cooking investments.

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
6.0	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