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-486
Date of decision	12/08/2026
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

The deviation is approved.

The CME and VVB shall comply with the requirements stated in Annex B – Conflict and Emergency Zones of the latest Gold Standard Principles and Requirements.

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

The CME shall ensure that the Objective Observer (OO) has been selected for the on-site audit as required by para 2.1.2 of the Annex B of Principles and Requirements version 2.1 and have conducted the audit under the guidance of a GS approved VVB. The CME will be responsible for contracting and covering the costs of the Objective Observer. The relationship between and among the CME, the Objective Observer and Gold Standard shall be established in a Memorandum of Understanding that must be signed by all parties. The CME shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

Note – 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 developer. The CME shall comply with all other applicable standard requirements unless specifically mentioned in the deviation decision.

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

The VVB shall provide a checklist to the selected Objective Observer before the site visit, to assist the Objective Observer in assessing the relevant aspects related to the Project's Verification. The checklist must be limited to issues that the VVB thinks would be necessary to check on-site to form the Verification opinion.

The verifying VVB shall ensure the following:

- The Objective observer (OO) is selected to conduct the assessment as per the checklist provided.

- The site visit conducted by the OO during the verification shall confirm the status of the project operation and the mitigation plans in place to tackle the negative impacts of the project.
- Assess and demonstrate how the selected OO has prior experience working in conflict zones/areas that pose a high risk to life and/or health. The VVB shall also demonstrate OO's involvement in other activities within the project's geographical area.

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provides its opinion in the Verification Report.

4.2.4 | Directions for the Gold Standard, if applicable

The assurance team shall review both the CME's response and the VVB's assessment/ opinion of the same and take appropriate steps.

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] :	Jakob Zenz
Email ID[4] :	jakob@econetix.net
Organisation:[5]:	Econetix GmbH
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 12469*	*GS 12470* *GS 12620*
Host country(ies)	Democratic Republic of the Congo		
Project Title	Uplifting communities through clean energy in the DRC Uplifting communities through clean energy in the DRC - VPA 1 Uplifting communities through clean energy in the DRC - VPA 2		
Registry link	**https://registry.goldstandard.org/projects/details/4481** **https://registry.goldstandard.org/projects/details/4483** **https://registry.goldstandard.org/projects/details/4482**		
Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below		

[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

	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	*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 ☐ 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-426; DEVRQ-146		
Status of the deviation	☒ Approved	☐ Rejected	☐ Under review
	☐ Yes ☒ No		

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

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?	**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	GS4GG Principles and Requirements - Annex B, Conflict and Emergency Zones (deviation, on a case-by-case basis, from the on-site visit requirement in conflict and emergency zones).
	Version	Version 2.0
	Paragraph	Annex B - Conflict and Emergency Zones, para 2.1.1

6.2 | Description of the deviation

Title	Request for Remote Audit and Objective Observer due to conflict-zone restrictions in the DRC	
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	01/06/2025
	End date	30/06/2026
	☐ NA	
Summarise the changes	In accordance with the Gold Standard GS4GG Principles and Requirements, Annex B - Conflict and Emergency Zones, para 2.1.1, ECONETIX GmbH (the Coordinating and Managing Entity) requests a deviation to allow remote audit and/or the use of an Objective Observer, in place of the mandatory physical on-site audit, for the following activities of its programme in the Democratic Republic of the Congo (DRC): (a) the transition of the Programme of Activities (GS12469) to the Paris-Agreement-aligned Gold Standard framework; (b) the transition of VPA-1 (GS12470) to the PULSE methodology; (c) the validation of VPA-2 (GS12620) under the RECH methodology; and (d) the verification of VPA-2 (GS12620) against its monitoring report. The programme activities are located in areas of the DRC currently affected by severe security concerns, armed violence and travel restrictions, making physical access highly unsafe for audit personnel, as continues to be reported by multiple publicly available sources.	

	ECONETIX approached the appointed Validation and Verification Body (VVB) to undertake the mandatory on-site activities for each of the above; however, the VVB is unable to safely deploy personnel to the project locations due to the prevailing security situation, and ECONETIX has been unable to identify any alternative VVB willing to conduct physical site visits in the concerned regions. The continued inability to undertake site visits would significantly delay the transition, validation and verification timelines, while the programme is expected to deliver substantial sustainable-development benefits and greenhouse-gas emission reductions for households across the DRC. ECONETIX therefore requests Gold Standard approval to conduct these audits through remote verification measures and/or the deployment of an Objective Observer, in line with the applicable Gold Standard provisions for conflict and emergency zones. Once the security situation stabilises and travel becomes feasible, ECONETIX commits to facilitating physical on-site audits at subsequent certification and verification events.
Reason for deviation	The programme's main operations are centred in and around Goma, the capital of North Kivu province in eastern Democratic Republic of the Congo (DRC), with distribution and field activities extending across surrounding areas of the eastern DRC. This region is one of the most volatile in the world and is directly affected by a protracted armed conflict. Eastern DRC, and the Goma area in particular, continues to experience active hostilities involving multiple armed groups, including recurrent advances and clashes in and around Goma, large-scale population displacement, roadblocks and unpredictable frontlines. These conditions make overland travel and physical access to project locations highly unsafe for audit personnel. Several governments maintain their highest-level travel advisories (for example, "do not travel") for North Kivu and the wider eastern DRC precisely because of the risk to life, kidnapping risk and the absence of reliable emergency support in the region. In addition to the security situation, eastern DRC, including North Kivu and neighbouring Ituri province, is one of the areas most frequently affected by Ebola Virus Disease (EVD). The region has suffered repeated EVD outbreaks in recent years and remains at ongoing risk of recurrence. During outbreaks, the affected zones are subject to movement restrictions, quarantine measures, mandatory health screening and heightened biosecurity controls, which further restrict the ability to travel into and within the project area. The combination of active armed conflict and recurrent public-health emergencies compounds the operational and safety barriers to conducting any physical on-site audit. Because of these conditions, the appointed Validation and Verification Body (VVB) is unwilling to conduct on-site audit activities in the project area, and, despite reasonable efforts, no alternative VVB willing to travel to the region could be identified. This applies equally to the PoA transition (GS12469), the VPA-1 transition (GS12470), and the

<table>
<tr><td></td><td>validation and verification of VPA-2 (GS12620), all of which have their principal activities in the same conflict- and health-affected area of eastern DRC.

Publicly available reports and supporting evidence demonstrating the ongoing security situation and the public-health risks in the project area, together with the appointed VVB's confirmation that it cannot safely deploy personnel on-site, have been provided with this request. On this basis, ECONETIX requests approval to proceed through remote audit and/or the deployment of an Objective Observer, in line with the Gold Standard provisions for conflict and emergency zones.</td></tr>
<tr><td>Proposed resolution</td><td>ECONETIX requests Gold Standard approval to proceed with the transition of the PoA (GS12469), the transition of VPA-1 (GS12470), and the validation and verification of VPA-2 (GS12620) through remote audit arrangements and/or the deployment of an Objective Observer, in line with Gold Standard requirements applicable to conflict and emergency zones.

Supporting documentation and publicly available evidence of the ongoing conflict, together with the appointed VVB's confirmation that it cannot safely conduct on-site activities, are provided. Physical on-site audits will be undertaken at future certification and verification events once the security situation improves and travel to the project area becomes feasible.</td></tr>
<tr><td>Is there any potential temporary or permanent impact of deviation on other aspects of the project?</td><td>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)

<table><tr><th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/ removal after applying deviation</th></tr><tr><td>XYZ tCO_2e</td><td>XYZ tCO_2e</td></tr></table>
☐ any other matrix, please specify…
☐ NA</td></tr>
<tr><td>Summary of the impact</td><td>There is no impact on the project design, local stakeholder consultation, safeguarding principles, SDG assessment, regulatory compliance, additionality, applicability of methodology, emission-reduction volume, data quality or any other aspect of the PoA or the VPAs as a result of this deviation. The deviation concerns only the modality of the audit (remote in place of on-site) and is temporary. The PoA and both VPAs will continue to abide by all Gold Standard requirements.</td></tr>
<tr><td colspan="2">Insert text here</td></tr>
</table>

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.*)

1. U.S. Department of State - Democratic Republic of the Congo Travel Advisory (North and South Kivu provinces designated Level 4: Do Not Travel; M23 occupation of Goma and Bukavu; kidnapping and armed attacks on NGO and aid personnel). https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories/democratic-republic-of-the-congo-travel-advisory.html

2. UK Government (FCDO) - Democratic Republic of the Congo Travel Advice (advises against travel; confirms M23 control of Goma and Bukavu and highly unstable, unpredictable routes). https://www.gov.uk/foreign-travel-advice/democratic-republic-of-the-congo

3. UN News - M23 rebels: UN warns violence persists (February 2026). https://news.un.org/en/story/2026/02/1166899

4. UN Security Council Report - Democratic Republic of the Congo, March 2026 Monthly Forecast. https://www.securitycouncilreport.org/monthly-forecast/2026-03/democratic-republic-of-the-congo-33.php

5. Al Jazeera - One year after M23 rebels seized DRC's Goma (29 January 2026). https://www.aljazeera.com/features/2026/1/29/banks-shut-futures-uncertain-one-year-after-m23-rebels-seized-drcs-goma

6. Council on Foreign Relations - Global Conflict Tracker: Conflict in the Democratic Republic of Congo. https://www.cfr.org/global-conflict-tracker/conflict/violence-democratic-republic-congo
7. World Health Organization - Ebola outbreak, DRC 2026 (situation page). https://www.who.int/emergencies/situations/ebola-outbreak---drc-2026
8. World Health Organization - Ebola epidemic in the DRC 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
9. World Health Organization - Disease Outbreak News: Ebola disease (Bundibugyo virus), DRC and Uganda (Ituri province most affected). https://www.who.int/emergencies/disease-outbreak-news/item/2026-DON602
10. European Centre for Disease Prevention and Control (ECDC) - Ebola outbreak in the Democratic Republic of the Congo and Uganda. https://www.ecdc.europa.eu/en/ebola-outbreak-democratic-republic-congo-and-uganda
11. U.S. Centers for Disease Control and Prevention (CDC) - Health Alert Network: Ebola Disease Outbreak in the DRC and Uganda. https://www.cdc.gov/han/php/notices/han00530.html

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