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-498
Date of decision	23/08/2026
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 request is not approved. The CME must follow the requirements from paragraph 5.1.37 of the Principles & Requirements. The 2-year retroactive period from the date of Project Design Certification is a core requirement, and the VVB scheduling, documentation timelines, and in-country logistics, do not constitute exceptional force majeure events sufficient to override this core requirement. The project shall only claim credits from 24/06/2024 onwards.

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 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] :	Chiara Martin
Email ID[4] :	Chiara.martin@co2balance.com
Organisation:[5]:	CO2balance UK LTD
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	GS12855 *GSXXXX*	*GS XXXX* *GS XXXX*	*GS XXXX* *GS XXXX*
Host country(ies)	Eritrea		
Project Title	GS12855 - VPA 68 Vita Green Impact Programme – Eritrea Safe Water Project		
Registry link	**https://registry.goldstandard.org/projects/details/4592**		
Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below *Insert text here*		

[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 *If other, specify here*
	31/07/2024	*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	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] Design certification date
[7] Date of first issuance approval by Gold Standard

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 and Requirements
	Version	2.1
	Paragraph	5.1.37

6.2 | Description of the deviation

Title	Request to extend Retroactive Certification to original start date	
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 impacts the credits potentially claimed for the first monitoring period of the project	
Relevant monitoring period, if applicable	Start date	06/02/2024
	End date	31/12/2024
	☐ NA	
Summarise the changes	*Describe the deviation requested from applicable rules/requirements. Please include all relevant information in support of the request.* Paragraph 5.1.37 of Principles and Requirements v2.1 states "The project may take into account retroactive period for performance Certification of Certified Impact Statement and /or Products. The maximum period for Retroactive Certification is two years prior to the date of Project Design Certification unless otherwise stated in a specific Impact quantification methodologies or Product Requirements" The project followed all other required certification timelines as stated in Principles and Requirements v2.1, but was unable to achieve Design Certification in the required timeframe for full retroactive certification from its start crediting date. The proposition is to enable the project to retroactively certify VERs from its original start crediting date.	
Reason for deviation	Describe the reasons for requesting deviation from applicable rules/requirements. The PD is requesting the deviation from paragraph 5.1.37 because significant delays in the combined Validation and Verification review process resulted in the project's Design Certification being achieved more than two years after the Project Start Date. The delays were primarily caused by circumstances outside the PD's reasonable control. The contract between the PD and the chosen VVB was signed by both parties in January 2025 (please refer to supporting	

	docs), shortly after the end of the monitoring period under review. The initial documentation required for the combined Validation and Verification reviews was submitted to the VVB in July 2025, and the site visit subsequently took place in November 2025. A significant amount of time elapsed between the signing of the contract, submission of the required documentation, and completion of the site visit. This was primarily due to difficulties in obtaining the requested supporting evidence from the in-country partner and, in particular, challenges associated with organizing the site visit. The site visit required access to the three project regions—the Northern Red Sea, Southern Red Sea, and Gash Barka. In Eritrea, travel to areas outside the capital, Asmara, requires special permits issued by the Government. Obtaining these permits was therefore a key constraint in organizing and completing the site visit. The PD made continuous efforts to progress the combined Validation and Verification process; however, the above circumstances resulted in the review process extending over an unusually long period. In addition, because the project was undergoing a combined Validation and Verification review, submission to the Gold Standard platform for Performance Review could only take place once all Validation CARs and CLs had been satisfactorily closed and Validation had been approved by the VVB. Validation was approved in May 2026, and the project was submitted to the Gold Standard platform for Performance Review in the same month. The timing of the Performance Review submission was therefore directly dependent on the completion and approval of the Validation review. The PD considers that the resulting delay was not due to inaction or a failure to progress the project, but rather to circumstances beyond its reasonable control. The PD also complied with the other applicable time-specific requirements under the Principles and Requirements v2.1, including the requirements relating to Listing, Validation, and Preliminary Review (5.1.1.b., 5.1.16, 5.1.51, 5.1.29). The purpose of paragraph 5.1.37 is understood to be to prevent projects from benefiting from extended periods prior to Design Certification by continuing to apply outdated methodologies or requirements. This risk does not arise in the present case, as the project will apply the CDM default fNRB values and the most up-to-date applicable methodology. Furthermore, the requested deviation would result in a retroactive certification period of approximately two years and four months, compared with the two-year period specified in paragraph 5.1.37. The additional four months therefore represents a limited and clearly defined extension, requested solely to account for the exceptional delays in the Validation and Verification review described above.

	For these reasons, the PD considers that the circumstances justify an exception to the requirement in paragraph 5.1.37 and respectfully requests that the deviation be approved.
Proposed resolution	*Describe the proposed resolution for example proposed alternative monitoring arrangements for the non-conforming monitoring period. Describe how proposed resolution complies with the related requirements, where applicable, the accuracy, completeness and conservativeness is ensured.* As per para 5.1.23 of Principle and Requirements v2.1, the date of Design Certification is the last day of the 4-week Design Review period. For this project, this corresponds to 24/06/2026, please note, the project is still undergoing Design Review. Consequently, without the requested deviation, the project would only be eligible for retroactive certification from 24/06/2024. This would exclude the period from the proposed Project Start Crediting Date of 06/02/2024, despite the fact that the project activities have been implemented from the proposed start date, with the first water point installation taking place on this date. The PD therefore proposes that the project be permitted to retroactively certify the VERs generated from its proposed Project Start Crediting Date of 06/02/2024, as specified in the current versions of the VPA Design Document. The proposed resolution does not compromise the **conservativeness** of the certified emission reductions. As described in the preceding section, all VERs generated during the proposed retroactive certification period will be calculated using the applicable CDM default fNRB values and the most up-to-date version of the applicable methodology permitted for the relevant pre-2026 vintages. The application of these values and the applicable methodology ensure that the emission reductions are not overstated as a result of the requested deviation. The deviation therefore does not create a risk of over-crediting arising from the delayed Design Certification. The **accuracy** of the project's emission reductions is likewise not affected by the timing of the Design Certification. The delay in completing the Validation and Verification reviews and the subsequent Design Review is procedural in nature and does not alter the underlying monitoring data, project activity, calculation methods, or parameters used to quantify the emission reductions. The emission reductions generated during the proposed retroactive period will remain subject to the applicable monitoring, verification, and quality control requirements. The **completeness** of the project is also maintained. The project has been progressing through the required project cycle and has complied with the other applicable time-specific requirements under the

	Principles and Requirements v2.1. The PD has demonstrated continued efforts to progress the Validation and Verification process and to submit the project for the required reviews. The proposed deviation therefore relates specifically to the timing requirement under paragraph 5.1.37 and does not waive or alter the other applicable project requirements. Accordingly, the proposed resolution would allow the project to retain the emission reductions generated from its proposed Project Start Crediting Date of 06/02/2024 while maintaining the required levels of accuracy, completeness, and conservativeness. The requested deviation would not result in the application of less stringent monitoring or quantification requirements, nor would it create a risk of over-crediting. All emission reductions generated during the proposed retroactive certification period will remain subject to the applicable monitoring and verification requirements.
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.
Insert text here	

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. Eritrea Water combined signed CONFIDENTIAL

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