

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](#)

CONTACT DETAILS

The Gold Standard Foundation
International Environment House 2
Chemin de Balxert 7-9
1219 Châtelaine Geneva, Switzerland
Tel +41 22 788 70 80
Email help@goldstandard.org

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.

Table of Content

1 General Guidelines.....	2
1.1 Applicability.....	2
2 Submission of deviation form	2
3 Implementation of deviation decision	2
4 Decision summary	4
4.1 General information.....	4
4.2 Decision.....	4
4.3 Applicability to other activities	4
5 Deviation Request Details.....	6
5.1 Submitted by.....	6
5.2 Details of the entity and its representative submitting the form	6
5.3 Background information.....	6
5.4 Project deviation history	7
6 Deviation detail	7
6.1 Standard document reference.....	7
6.2 Description of the deviation.....	7
6.3 VVB information.....	9
6.4 VVB's assessment	9
6.5 Documents:	15

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVREQ-61
Date of decision	24/01/2025
Decision	<input type="checkbox"/> Approved [No precondition to apply the deviation decision] <input checked="" type="checkbox"/> Conditionally approved [Decision is subject to compliance with the precondition defined below] <input type="checkbox"/> Not approved [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

The deviation is conditionally approved.

Please note the following requirements that must be adhered to as part of this approval:

- The project developer (PD) or validation/verification body (VVB) shall comply with the stipulations outlined in Annex B – Conflict and Emergency Zones of the Gold Standard Principles and Requirements.
- An objective observer must be hired to ensure the integrity and impartiality of the verification process.

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

The project developer shall report the deviation and its decision in the applicable monitoring report.

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

The VVB shall verify the compliance with the above-mentioned.

...

4.2.4 | Directions for the Gold Standard, if applicable

N/A

4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances? ¹	<input type="checkbox"/> Yes <input type="checkbox"/> No
---	---

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.

Does this decision set a precedent for future projects with similar circumstances? ²	<input type="checkbox"/> Yes <input type="checkbox"/> No
Precedent details (if applicable to other activities)	

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 :	Sanjith Kakkat
Email ID ⁴ :	sanjith.kakkat@agasco.com
Organisation ⁵ :	Agasco Ltd
Are you an authorized project participant as per the cover letter submitted for this activity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

5.3 | Background information

Type	<input checked="" type="checkbox"/> Project activity	<input type="checkbox"/> PoA GSXXXX	<input type="checkbox"/> VPA
GS ID	GS11729 GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Nigeria		
Project Title	Agasco Improved Cookstoves Nigeria		
Registry link	GSF Registry		
Scale	<input type="checkbox"/> Microscale (GS) <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale <input type="checkbox"/> Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding date of latest status	<input checked="" type="checkbox"/> Certified design	<input type="checkbox"/> Certified project	<input type="checkbox"/> Other <i>If other, specify 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

	dd/mm/yyyy	14/07/2023	dd/mm/yyyy	dd/mm/yyyy
Applied version of Standard	<input checked="" type="checkbox"/> GS4GG			
	<input type="checkbox"/> Previous version of Gold Standard	Version no.		
		<input type="checkbox"/> 1.0	<input type="checkbox"/> 1.1	<input checked="" type="checkbox"/> 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	<input type="checkbox"/> CDM <input type="checkbox"/> Other Name of the Standard – Insert text here		
Applicable requirement	<input type="checkbox"/> Renewable Energy Activity Requirements <input checked="" type="checkbox"/> Community Services Activity Requirements <input type="checkbox"/> Land-use and Forests Activity Requirements <input type="checkbox"/> 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.			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Reference number	DEV_635		
Status of the deviation	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Rejected	<input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Summary of the findings <i>Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number</i>		

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, Principles & Requirements, and Applicability of Minimum Site Visit Requirements by VVB
	Version	v2.0, v2.0, N/A respectively
	Paragraph	Para (3.1.1, 3.2.2), 5.1.26, 2.1.1.A respectively

6.2 | Description of the deviation

Remote Site Visit	Remote site visit for the first verification
-------------------	--

Confirm the nature of changes related to deviation	<input checked="" type="checkbox"/> Temporary (e.g. not expected to occur beyond one monitoring period)	<input type="checkbox"/> Permanent (e.g. deviation from requirements prior to submission for certification)
Insert Text here (if required) to support the selection		
Relevant monitoring period, if applicable	Start date	10/01/2023
	End date	31/10/2024
Summarise the changes	<p>As per the Site Visit and Remote Audit Requirements and Procedures version 2.0 para 3.1.1, at minimum, the VVB shall conduct physical site visit within two years of project start date. Para 3.2.2, a physical site visit by VVB is mandatory at the first verification of a project.</p> <p>As per para 5.1.26 of Principle & Requirements V2.0, verification includes a site visit by a VVB who assesses the monitoring report and all supporting evidence and documents.</p> <p>According to Applicability of minimum Site Visit Requirements by VVB, para 2.1.1.A, Force-Majeure, an event beyond the control of the project developer and not involving the developer's fault or negligence and not foreseeable, may result in non-compliance with site visit requirements.</p> <p>Refer to latest version of Deviation Request Requirements and Procedures for requirements and guidelines</p>	
Reason for deviation	<p>Travel to Nigeria is deemed unsafe based on various travel advisories issued by international and governmental organizations. The project activity is aiming distribution of improved cookstoves to household in Nigeria. During the first monitoring period 10/01/2023 to 31/10/2024 the stove distribution was conducted in Bauchi States and Taraba States. The project developer previously requested a similar deviation for the monitoring period 10/01/2023 to 10/01/2024 and approved by GS, but project developer had to extend the monitoring period. However, the United Kingdom Foreign and high Commission of India (Nigeria travel advice - GOV.UK, Advisories Archives) still advise against travel to the project locations in Taraba and Bauchi States, Nigeria.</p>	
Proposed resolution	<p>Due to safety concerns, the project developer is requesting a remote site visit. This would include interviews with end users and other stakeholders conducted via phone calls, video calls, video recordings, as well as the use of geological data and geoinformation systems, as outlined in paragraph 2.C of the Site Visit and Remote Audit Requirements and Procedures.</p> <p>All planning, scheduling, and carrying out of the hybrid remote audit will be done in line with para 6.4 of Site Visit and Remote Audit Requirements and Procedures version 2.0</p>	
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	<p>Select the relevant area:</p> <p><input type="checkbox"/> Project design</p> <p><input type="checkbox"/> Local stakeholder consultation</p> <p><input type="checkbox"/> Safeguarding principles</p> <p><input type="checkbox"/> SDG assessment</p>	

	<input type="checkbox"/> Regulatory compliance <input type="checkbox"/> Additionality <input type="checkbox"/> Applicability of methodology <input type="checkbox"/> 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 removal after applying deviation</th> </tr> </thead> <tbody> <tr> <td>XYZ tCO₂e</td> <td>XYZ tCO₂e</td> </tr> </tbody> </table>	Annual emission reduction/removal before applying deviation	Annual emission removal after applying deviation	XYZ tCO ₂ e	XYZ tCO ₂ e
Annual emission reduction/removal before applying deviation	Annual emission removal after applying deviation				
XYZ tCO ₂ e	XYZ tCO ₂ e				
	No impact on the above-mentioned area.				
	<input type="checkbox"/> any other matrix, please specify...				
Summary of the impact	The deviation will not have a negative impact on project design, Local stakeholder consultation, safeguarding principles, SDG assessment, Regulatory compliance, Additionality, Applicability of methodology, emission reductions, monitoring frequency, data quality, potential risks or any other relevant aspect of the project.				

Insert text here

6.3 | VVB information

Is a VVB opinion on the deviation request required? <i>VVB opinion shall be included, where required by the requirements under Deviations Request Requirements and Procedures or request is submitted by the VVB.</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <i>The relevant information has been added in section 6.4 below.</i>
--	---

6.4 | VVB's assessment

The below information is to be completed by VVB, if applicable.

VVB's assessment of deviation request	In consideration of travel advisories issued by the High Commission of India, Australian Department of Foreign Affairs and Trade (DFAT) ⁶ , Canadian Government ⁷ , the Federal Department of Foreign Affairs (FDFA), and the UK Foreign, Commonwealth & Development Office (FCDO) ^{8,9} advising against non-essential travel to Borno, Yobe, Adamawa, and Gombe states, particularly Bauchi State, in addition to the United States State Department's designation of Bauchi State and Taraba State, as level 4 Do Not Travel areas due to risks including kidnapping and other safety concerns, the deviation request has been formulated to prioritize the safety and well-being of all participants involved in the verification site visit.
---------------------------------------	--

⁶ <https://www.smarttraveller.gov.au/destinations/africa/nigeria>

⁷ <https://travel.gc.ca/destinations/nigeria>

⁸ <https://www.gov.uk/foreign-travel-advice/nigeria>

⁹ https://assets.publishing.service.gov.uk/media/6544d3059e05fd000dbe7cb8/FCDO__TA__030_-_Nigeria_Travel_Advice_Ed8.pdf

	Additionally, to enhance the level of assurance, the audit team representing VVB will travel to Abuja and conduct visits to Agasco Ltd. head office, as well as other relevant parties such as manufacturers and local implementers (Roshan Renewables), to authenticate the supporting evidence provided by the PD during the audit process. This approach will enable the audit team to interview professionals engaged in the project activities, thereby allowing the Lead Auditor & TA Expert to ascertain the level of assurance associated with the project verification								
VVB’s assessment of impact of deviation request	<div>Risk associated with the non-conduction of mandatory physical on-site inspection for verification.</div> <table><tr><th>Sl. No</th><th>Identification of potential risks</th><th>Mitigation measures</th><th>Risk Mitigated</th></tr><tr><td>1.</td><td>Risk associated to verify project implementation and operation with respect to the registered/included documents (PDD/PoA DD, CPADD)</td><td><div>During remote interviews conducted via audio/video calls (where feasible) and through real-time photographs during the remote audit, the nameplate containing capacities and unique identification will be verified. This will be cross-checked against relevant documents, such as statutory clearances and the project database.</div><div>Additionally, the logbooks and grievance mechanism records of Roshan Renewables will be reviewed at the head office during the remote Audit. This review may be conducted either synchronously (in real time) or asynchronously, as applicable, and can also be facilitated remotely using platforms like Zoom or Google Meet.</div></td><td><div><input checked="" type="checkbox"/> Yes</div><div><input type="checkbox"/> NO</div></td></tr></table>	Sl. No	Identification of potential risks	Mitigation measures	Risk Mitigated	1.	Risk associated to verify project implementation and operation with respect to the registered/included documents (PDD/PoA DD, CPADD)	<div>During remote interviews conducted via audio/video calls (where feasible) and through real-time photographs during the remote audit, the nameplate containing capacities and unique identification will be verified. This will be cross-checked against relevant documents, such as statutory clearances and the project database.</div> <div>Additionally, the logbooks and grievance mechanism records of Roshan Renewables will be reviewed at the head office during the remote Audit. This review may be conducted either synchronously (in real time) or asynchronously, as applicable, and can also be facilitated remotely using platforms like Zoom or Google Meet.</div>	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> NO</div>
Sl. No	Identification of potential risks	Mitigation measures	Risk Mitigated						
1.	Risk associated to verify project implementation and operation with respect to the registered/included documents (PDD/PoA DD, CPADD)	<div>During remote interviews conducted via audio/video calls (where feasible) and through real-time photographs during the remote audit, the nameplate containing capacities and unique identification will be verified. This will be cross-checked against relevant documents, such as statutory clearances and the project database.</div> <div>Additionally, the logbooks and grievance mechanism records of Roshan Renewables will be reviewed at the head office during the remote Audit. This review may be conducted either synchronously (in real time) or asynchronously, as applicable, and can also be facilitated remotely using platforms like Zoom or Google Meet.</div>	<div><input checked="" type="checkbox"/> Yes</div> <div><input type="checkbox"/> NO</div>						

	2	Risk associated to verify implemented monitoring plan with the registered/included documents (PDD/PoA-DD, VPA-DD) and applied	This risk will be mitigated by conducting remote interviews via audio/video calls with end users to verify the monitoring parameters outlined in the registered PDD. Additionally, the documents will be cross-checked during the remote audit conducted at the head office of Agasco Ltd./Roshan Renewables by the audit team.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
	3	Risk associated to verify that the actual monitoring systems and procedures comply with the monitoring systems and procedures described in the monitoring plan.	This risk can be mitigated during remote interview video call/video recording/a real time photo of the monitoring equipment along with make and model, to check whether calibration of each of the measuring equipment is done at intervals specified in the registered document (PDD/PoA-DD/VPA-DD). Furthermore, this can be cross verified by reviewing all the calibration certificates and taking note of the date of calibration on each one for each	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO

			<p>specific monitoring equipment at the head office of Roshan renewables.</p> <p>Remote Interview will be conducted at Agasco. Ltd/Roshan renewables head office with the relevant personnel to ensure that the calibration procedures are being followed as per the registered monitoring plan.</p>	
	4	<p>Risk associated to evaluate the GHG emission reduction data and express a conclusion with a reasonable level of assurance on whether the reported GHG emission reduction data is free from material misstatement.</p>	<p>The identified risk can be mitigated by managing access to the records during audio/video calls at Roshan renewables & Agasco. Ltd, head office. It will be verified whether a project has adequate controls related to data changes/updates, version tracking, traceability, security and weather data is reproduceable from the sample sheet. Furthermore, data quality control personnel can also be interviewed to establish the level of assurance.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
	5	<p>Risk associated to verify that reported GHG emission data is sufficiently supported by evidence.</p>	<p>The identified risk can be mitigated during remote interview by asking for a complete set of data for the monitoring period and information provided in the monitoring report can be cross-checked with other</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO

		sources such as electricity/heat sales receipts/logs. To check weather, calculations of baseline emissions and emission reduction have been carried out in accordance with the formulae and methods described in the monitoring plan and the applied methodology. Furthermore, appropriate/correct emission factor value has been applied or not.	
6	Any outstanding FAR(s)/pending issue (s) since the previous physical site visit.	The identified risk is mitigated by reviewing the validation report, confirming that no FARs were raised during the design review.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
7	Any gaps in monitoring data, if any, that cannot be justified as per applicable requirements.	As per the shared data no such gap exists for the proposed monitoring period as this is the first verification of the project.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
8	Any design changes(s)/temporary deviation(s) since the previous physical site visit.	The identified risk is mitigated by reviewing the validation report, which confirms that no design changes are present.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO
9	Sustainable development goals targeted under the project activity	According to the registered PDD, eight SDGs have been claimed and validated by the VVB. The identified risk will be addressed by reviewing the supporting	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> NO

	<table><tr><td></td><td>documents / evidence which will be further cross-verified during the remote audit at the beneficiaries household, head offices of Agasco Ltd and Roshan Renewables.</td><td></td></tr></table>		documents / evidence which will be further cross-verified during the remote audit at the beneficiaries household, head offices of Agasco Ltd and Roshan Renewables.	
	documents / evidence which will be further cross-verified during the remote audit at the beneficiaries household, head offices of Agasco Ltd and Roshan Renewables.			
	<p>The VVB opines that the identified deviation is unlikely to negatively impact the project design, the assessment of project implementation, safeguarding principles, evaluation of Sustainable Development Goals (SDGs), achievement of emission reductions, monitoring frequency, data quality, associated risks, or any other relevant aspects of the project. Additionally, conducting interviews with stakeholders involved in the project activity within the host country will help ensure that the aforementioned risks are effectively mitigated.</p>			
VVB recommendation	<p>Based on the assessment conducted, the VVB recommends approval of the proposed deviation for the project registered under GS4GG. The VVB has carefully evaluated the potential implications of the deviation and concludes that it does not adversely affect the following key elements of the project:</p> <ol style="list-style-type: none">1. Project Design and Implementation: The deviation does not compromise the integrity of the project design or its implementation.2. Safeguarding Principles: There is no evidence to suggest that the deviation infringes upon safeguarding principles.3. Sustainable Development Goals (SDGs): The deviation does not hinder the evaluation or achievement of the relevant SDGs.4. Emission Reductions: The attainment of the intended emission reductions remains unaffected.5. Monitoring and Data Quality: The frequency and quality of monitoring, as well as the integrity of collected data, are maintained.6. Risk Assessment: No significant risks have been identified that could arise due to the deviation. <p>To further ensure that the deviation does not compromise the project's objectives, the VVB recommends conducting interviews with stakeholders and other relevant parties engaged in the project activities within the host</p>			

	country. These interviews will provide additional assurance that any potential risks are mitigated and that the project remains aligned with GS4GG requirements. In light of the above, the PD respectfully seeks approval for this deviation, with the assurance that all necessary measures have been undertaken to maintain the project's credibility, sustainability, and alignment with GS4GG standards.	
VVB details	VVB name:	Earthood Services Limited
	Auditor name(s):	Team Leader: Sushant Vashisht TA expert 3.1: Sushant Vashisht GS Approved Auditor: Sushant Vashisht Verifier: Sushant Vashisht Trainee Verifier: Ronaldo Sebastian Local Expert – Nigeria: Kumdan Nanbal Luka
	Email (s):	operations@earthood.in sushant.vashisht@earthood.in

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.*)

Not Applicable

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: <ul style="list-style-type: none"> - 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