

FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: 12/11/2024

VERSION: 6.0

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RELATED DOCUMENTS

– [Deviations Approval Requirements and Procedures](#)

CONTACT DETAILS

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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-94
Date of decision		11/06/2026
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 | Reconsideration Decision

Surveys are needed for alignment with key requirements in the methodology and to ensure integrity of the project; however, the survey requirement may be waived for this specific monitoring period, given that:

- the monitoring period is reduced to cover only 2019 and 2020 vintages
- The PD applies conservative caps for all parameters for the full, updated monitoring period.

Usage rate (Up,y)

The highest acceptable caps shall be those proposed by the PD in the reconsideration request:

Year 2019, GS5383: Applied Usage Rate: 56%

Year 2020, GS5383: Applied Usage Rate: 32%

Year 2019, GS5447: Applied Usage Rate: 56%

Year 2020, GS5447: Applied Usage Rate: 29%

As per the explanation provided by the PD in the Reconsideration Request, the cookstoves have a maximum lifetime of 2 years, with less than 6% of cookstoves being older than 3 years. Therefore, the calculations shall assume a usage rate of 0 for Year 3 and beyond for all distributed stoves.

The PD shall demonstrate that there is no likelihood that the real usage rate is lower than the proposed caps and adjust them further downwards if necessary.

Time spent collecting firewood (Tp,y)

The survey results from 2020 may be used and the associated value of 55 mins/day (0.92 hours/day) may be applied.

Other parameters:

Other parameters shall be monitored as per the approved methodology for the full monitoring period.

Important notice:

This deviation may only be applied to this particular monitoring period for these particular projects and shall under no circumstances constitute a precedent for other projects or monitoring periods.

4.2.2 | **Original Decision Summary**

The deviation request for delay in submission of the Annual Report is approved.

The deviation request for exemption of monitoring surveys for monitoring parameter Pp,y, Up,y, LEp,y, and Tp,y is not approved.

This decision on Annual report is specifically for the monitoring period 01/07/2019 to 31/12/2021 for the VPAs GS5383 and GS5447.

The project developer shall implement a process to ensure that all the delayed and latest annual reports of the project activities with GS IDs, GS5383 and GS5447 are submitted by the end of year 2025 as stipulated in the [PRINCIPLES & REQUIREMENTS](#) - Version 2.1 § 5.1.39 to 5.1.44. in future or any other version that supersede in future; and independent of any status of the project. The project developer shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision.

Regarding the monitoring requirements:

i. Pp,y – The explanation provided in the Deviation is satisfactory. PD can proceed with emission reduction calculation using results from the Kitchen performance tests carried out in August 2021 to represent the Monitoring period dated 01/07/2019 – 31/12/2021 only. This deviation is only applicable for the Monitoring period mentioned. PD shall ensure future KPTs are carried out as per the frequency required in the Methodology and GS4GG standard.

ii. Up,y, - The approach proposed by the PD is not acceptable. Usage rate is monitored via Usage surveys as per the Methodology monitoring approach. PD shall ensure that there is no deviation from the Methodological requirement on this parameter. Parameter Up,y is an annually monitored parameter as per the applicable methodology. PD shall ensure that the usage survey is carried out for the missing period of year 2021, and apply the results in the Monitoring period

iii. LEp,y, – The approach proposed by PD is not acceptable and not approved. Leakage assessment shall be carried out for the monitoring period in question as per the methodological requirements, and VVB shall confirm and provide a verification opinion on the same.

iv. Tp,y, - The approach proposed by PD is not acceptable and not approved. Tp,y shall be carried out for the monitoring period in question as per the methodological requirements, and VVB shall confirm and provide a verification opinion on the same.

4.2.3 | **Directions for the project developer/CME, if applicable**

As given above

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

The verifying VVB shall, through appropriate means at disposal, evaluate that the project's compliance with the above-mentioned conditions and provide VVB opinion in the verification report.

The VVB shall verify these proposed caps and the demonstration provided and confirm they are indeed conservative.

4.2.5 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the project developer 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)	
N/A	

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 :	George Syder
Email ID ⁴ :	george.syder@co2balance.com
Organisation: ⁵	CO2balance UK Ltd

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.

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

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	GS5383 GS5447									
Host country(ies)	Malawi											
Project Title	GS5383 Energy for Sustainable Development – Malawi VPA1 GS5447 Energy for Sustainable Development – Malawi VPA2											
Registry link	https://registry.goldstandard.org/projects/details/951 https://registry.goldstandard.org/projects/details/965											
Scale	☐ Microscale (GS) ☒ Small scale ☐ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>											
Certification Status and corresponding date of latest status	☐ Listed dd/mm/yyyy	☐ Certified design dd/mm/yyyy	☒ Certified project 29/08/2018	☐ Other <i>If other, specify here</i> dd/mm/yyyy								
Applied version of Standard	☒ GS4GG ☐ Previous version of Gold Standard <table border="1"> <tr> <td colspan="4">Version no.</td> </tr> <tr> <td>☐ 1.0</td> <td>☐ 1.1</td> <td>☐ 1.2</td> <td>☐ 2.2</td> </tr> </table>				Version no.				☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
Version no.												
☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2									
Transition date, if applicable	From previous GS version to GS4GG		16/04/2019									
	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 <i>Insert name here</i>											

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 The R1 Findings of the PR performed by SutainCert (19 th Feb 2025; GS5383_GS5447_GS4gg Performance Review Template_R1_19022025.docx)) highlight noncompliance of Annual Reporting Submissions (17.1; Page 8.), as well as deviation from the monitoring requirements for the Parameter Pp,y, Up,y, LEp,y, and Tp,y (8.1-4; Page 5)		

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	V2.1
	Paragraph	5.1.39; 5.1.40
Standard document reference	Title	Technologies and Practices to Displace Decentralized Thermal Energy Consumption
	Version	V3.1
	Paragraph	3.0 1.C

6.2 | Description of the deviation

Title	Deviation in Monitoring Frequency and Annual Report Submission	
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)
	Deviation is related to the completion of specific monitoring activities and submission of specific documents.	
Relevant monitoring period, if applicable	Start date	01/07/2019
	End date	31/12/2021
Summarise the changes	For the Second Monitoring Period (01/07/2019 to 31/12/2021), according to Paragraph 5.1.39 of the Principles and Requirements: "Transparent, annual update reports need to be provided for Projects that have achieved the Project	

	Design Certification stage or have successfully transitioned to Gold Standard for the Global Goals. An annual report shall be submitted for each monitoring year by end of next calendar year for which verification is not completed. If a verification is in progress but not completed, then an Annual Report is still required by the end of calendar year.”, otherwise as per 5.1.40: “Failure to provide Annual Reports as required shall result in the decertification of the Project.” The CME request that, based on the reasoning provided in the section below, a deviation will be provided to allow for the project to continue without de-certification. In addition, related to the monitoring requirements set out in Section 3.0 1.C of TPDDTEC v3.1, we seek a change in the monitoring frequency requirements.
Reason for deviation	Organizational Restructure: Globally, United Purpose Merged with Gorta Self Help Africa in August 2021. In Malawi, effective August 2021, United Purpose and Self-Help Africa started operating as a single entity under the name Self Help Africa/United Purpose. Legally United Purpose legal registration in Malawi was dissolved and merged with Self Help Africa effective January 2024. In addition, prior to this restructuring, changes in the team members overseeing the project resulted in some requirements, such as Annual Reporting and monitoring frequencies, being omitted. COVID19 Impact: In addition to the above-mentioned organisational restructure, COVID19 impacted the ability of the PD to carry out the necessary monitoring to the full requirements, and impacts on staffing led to reduce administrative capabilities. Verification Contracting Date: The CME (CO2balance UK Ltd.) was not contracted to complete the 2nd Verification of this project until 2023, after the deadline for the submission of all Annual Reports. Up,y and Tp,y - monitoring frequency is annual. For the MP related to this Deviation Request (2019/2021), the surveys were carried out in 2019 and 2020; in 2021 surveys were as well carried out, however, this data was lost, hence the Deviation Request. Pp,y - monitoring frequency is biennial. KPT was performed in 2017 and 2021, not aligning with the 2 years requirement, hence Deviation Request. Please note that the KPT for the MP undergoing Performance Certification (01/07/2019 – 31/12/2021) was conducted in August 2021, less than 6 months before the end of the Monitoring Period: this would represent the lowest efficiency period of the stoves, leading to

	a more conservative value as this value was applied for the whole MP. LEp,y - monitoring frequency is biennial. Leakage was assessed in the MR. For this project it can be continued to be deemed insignificant as it involves the replacement of three-stone fires. As the lowest cooking technology available, there is no displacement caused by the discontinuation of the stove, and no waste generated as it is created from the local environment. The existing Leakage assessment is therefore able to be maintained and unaffected by this deviation. Summary of Monitoring <table><tr><th>Parameter</th><th>Monitoring Date</th><th>Result</th></tr><tr><td>Up,y</td><td>Associated Study April 2016 - June 2020</td><td>GS5383 Weighted Averages 2019 – 80% (Capped at 75%) 2020 – 57% 2021 – 33% GS5447 Weighted Averages 2019 – 78% (Capped at 75%) 2020 – 54% 2021 – 30%</td></tr><tr><td>Pp,y</td><td>June 2021</td><td>3.94 kg/household/day</td></tr><tr><td>Tp,y</td><td>Associated Study April 2016 - June 2020</td><td>55 mins/day (0.92 hours/day)</td></tr><tr><td>LEp,y</td><td>May 2023 (Original Assessment Maintained)</td><td>0</td></tr></table> As mentioned above, the parameters are not in line with the monitoring frequency requirements, and we are seeking deviation for the Monitoring period 01/07/2019 – 31/12/2021 (undergoing Performance Certification at the moment)	Parameter	Monitoring Date	Result	Up,y	Associated Study April 2016 - June 2020	GS5383 Weighted Averages 2019 – 80% (Capped at 75%) 2020 – 57% 2021 – 33% GS5447 Weighted Averages 2019 – 78% (Capped at 75%) 2020 – 54% 2021 – 30%	Pp,y	June 2021	3.94 kg/household/day	Tp,y	Associated Study April 2016 - June 2020	55 mins/day (0.92 hours/day)	LEp,y	May 2023 (Original Assessment Maintained)	0
Parameter	Monitoring Date	Result														
Up,y	Associated Study April 2016 - June 2020	GS5383 Weighted Averages 2019 – 80% (Capped at 75%) 2020 – 57% 2021 – 33% GS5447 Weighted Averages 2019 – 78% (Capped at 75%) 2020 – 54% 2021 – 30%														
Pp,y	June 2021	3.94 kg/household/day														
Tp,y	Associated Study April 2016 - June 2020	55 mins/day (0.92 hours/day)														
LEp,y	May 2023 (Original Assessment Maintained)	0														
Proposed resolution	Regarding Annual Reporting the proposed resolution is to allow the project to continue certification. There is precedent for this set out in DEV_774 for GS5575 20 MW Solar Project in Sanwreej, Jodhpur, Rajasthan, which set out similar reasoning. Regarding the monitoring requirements, we propose the following: Up,y Capping Usage Rate to 75% (as per Usage Rate Guidelines), and altering the cumulative usage rate calculation by reducing															

	the usage for each age group (1-4) from 89%,83%,84%, and 100% to 89%, 83%, 72% and 79% respectively and becoming more conservative UR values. Please note that the usage rate calculation is detailed in '2021 05 17 Monitoring, Usage and Sustainable Development Report'. It is assumed that stoves not in use in one year will not be in use in subsequent years, therefore to calculate the final usage rate, the compound usage of the value stated above is used instead. This means that the respective age-wise adjusted usage rates (ages 1-4) are proposed to change from 89%, 71%, 55%, 55% to 89%, 71%, 43%, and 22%, becoming more conservative. In addition, as the usage rate calculation is being applied in two areas (firstly for the calculation of PTDs, then for the calculations of Stove Usage, which includes calculations prior to the application of this deviation) this leads to a highly conservative effective usage rates as follows: 2019 – 56%/56%, 2020 – 32%/29%, 2021 – 11%/9% for GS 5383/5447 respectively. This application leads to a change in credits for GS5383 of 84,937 to 60,063 and 84,635 to 57,318 in GS5447. An effective 30% reduction in ERs now claimed. When compared to the Ex-ante calculation of the approved PDD (150,750 for each VPA) the total credits are 39% of this value. See pre-deviation Ex-antes: GS5383 MP2 Database and ERs v5_REDACTED.xlsx and GS5447 MP2 Database and ERs v5_REDACTED.xlsx and post-deviation ex-antes: GS5383 MP2 Database and ERs v6_REDACTED.xlsx and GS5383 MP2 Database and ERs v6_REDACTED.xlsx. This approach is more conservative than applying a flat 50% Usage Cap, which would result in 65,581 credits in GS5383 (GS5383 MP2 Database and ERs v6_REDACTED_ALT.xlsx) and 66,327 in GS5447 (GS5447 MP2 - Database and ERs v6_REDACTED_ALT.xlsx) Pp,y There is no material impact on only one KPT being conducted as it was conducted in June 2021, less than 6 months before the end of the Monitoring Period. Therefore, this would represent the lowest efficiency period of the stoves, leading to a more conservative value as this value was applied for the whole MP. Tp,y
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	As with the above, this parameter was monitored in 2020 and 2021, representing the least efficient period for the stoves, and therefore when the stoves require the most firewood, leading to a greater time spent collecting firewood, therefore the approach remains conservative. LEp,y Leakage for this project can be continued to be deemed insignificant as it involves the replacement of three-stone fires. As the lowest cooking technology available, there is no displacement caused by the discontinuation of the stove, and no waste generated as they are created from the local environment. The existing Leakage assessment is therefore able to be maintained unaffected by this deviation.				
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 (<i>if yes, fill the table below</i>) <table border="1" data-bbox="588 1144 1442 1339"> <thead> <tr> <th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/removal after applying deviation</th></tr> </thead> <tbody> <tr> <td>67,717 tCO₂e (169,572 tCO₂e across MP)</td><td>46,875 tCO₂e (117,381 tCO₂e across MP)</td></tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	67,717 tCO ₂ e (169,572 tCO ₂ e across MP)	46,875 tCO ₂ e (117,381 tCO ₂ e across MP)
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				
67,717 tCO ₂ e (169,572 tCO ₂ e across MP)	46,875 tCO ₂ e (117,381 tCO ₂ e across MP)				
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. All impacts are temporary as they are only related to the Monitoring Period 01/07/2019 – 31/12/2021. The impact of the deviation is primarily administrative and related to the number of ERs generated from the project. These VPAs (GS5383, GS5447) are part of the ongoing work of Self-Help Africa (formerly United Purpose) in Malawi and are vital to ensuring some of the poorest members of society have effective means to reducing their fuelwood impact and providing time-savings. This project is implemented alongside the recently issued				

	GS11206, using the same stove, in the same country, by the same team, and targeting similar households. The issuance of this project highlights this deviation is primarily due to the administrative challenges stated in the Reason for Deviation section, rather than the implementation and impact of the project. Safeguarding Principles: Through our safeguarding measures we ensure that communities involved in the project may communicate any cases of corruption through the continuous mechanism established for the projects, no cases of corruption have been reported during this monitoring period. End-users contact their respective community-based project Promoters by phone or physical visits to lodge any grievances they may have, including stoves requiring replacement. The Promoter verifies grievance and depending on its nature, escalates it to the Project team by phone for swift redress. If stove replacements are needed in-country partner provides with replacements, reflecting that grievances are considered and are subsequently resolved. The deviation does not impact this process, other than how this is communicated to the Gold Standard (through Annual Reporting). SDG Assessment: SDG1 – No impact as linked to stove distribution; SDG 5 – No impact; SDG 7 – Linked to Usage Rate, therefore reduction in SDG benefit is conservative; SDG 13 – Reduction in ERs is conservative. See tracked MP for detail. Annual Emission Reduction Value: As stated in the Proposed Resolution an effective 30% reduction in credits will be applied, leading to an average annual emission of 46,875 tCO₂e across the MP. See tracked MP. When comparing to the recently Verified GS11206 (MP attached) also managed by UP/SHA in Malawi by the same team, using the same stove technology in similar households, we get an estimated 1.02 ERs per Stove per year. This is compared to a post-deviation average in this project of 0.61 ERs per Stove per Year, a 40% reduction.
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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 <u>Deviations Request Requirements and</u></i>	Yes ☐ No ☐ <i>If answer is yes, fill the information in section 6.4 below.</i>
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Procedures or request is submitted by the VVB.

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. GS5382 PoA – GS5383 MR MP2 v7_TRACKED.pdf

Document 2. GS5382 PoA – GS5447 MR MP2 v7_TRACKED.pdf

Document 3. GS5383 MP2 Database and ERs v6_REDACTED.xlsx

Document 4. GS5447 MP2 Database and ERs v6_REDACTED.xlsx

Document 5. GS5383 MP2 Database and ERs v6_REDACTED_ALT.xlsx

Document 6. GS5447 MP2 Database and ERs v6_REDACTED_ALT.xlsx

Document 5. GS5383 MP2 Database and ERs v5_REDACTED.xlsx

Document 6. GS5447 MP2 Database and ERs v5_REDACTED.xlsx

Document 7. GS5383_GS5447_GS4GG Performance Review

Template_R1_19022025.docx

Document 8. 2021 05 17 Monitoring, Usage and Sustainable Development Report.docx

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