

TEMPLATE

# DEVIATION REQUEST FORM

---

PUBLICATION DATE **14.1.2021**

Version **4.0**

---

## **A. To be completed by Gold Standard**

### **1| Decision**

**1.1 | Date – 20/06/2022**

#### **1.2 | Decision**

The applied deviation request is not approved. TAC considers that accepting this request would be a retrogressive step and would not correctly reflect the situation of nonbiocidal coatings development. Thus, E-TAC decided not to accept this request.

#### **1.3 | Is this decision applicable to other project activities under similar circumstances?**

No



**B. To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation** (Submit deviation request form in Microsoft Word format)

**2| Background information**

Deviation Reference Number	DEV_266	
Date of decision	20/06/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	01 March 2022	
Project/PoA/VPA	Project	ID – GSXXXX
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title		
Location of project/PoA/VPA	Host country(ies)	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA		
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Application of Retrofit Energy Efficiency Measures in Shipping to Advanced Coatings	
Specify applicable rule/requirements/methodology and version number	422 V2.0 EE Retrofit Energy Efficiency Measures in Shipping (13.12.2021)	
Specify the monitoring period for which the request is valid (if applicable)	Start date	End date
Submitted by	Contact person name: Hauke Kite-Powell	
	Email ID: hauke.kite-powell@marsoft.com	
	Organisation: Marsoft Inc.	
	Project participant: Yes <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes <input type="checkbox"/> NO <input type="checkbox"/>  If yes; VVB name:  Auditor name:	

### 3| Deviation detail

#### 3.1 | Description of the deviation:

*\*Guidance\* Use the space below to describe the deviation and substantiate the reason for requesting deviation from applicable rules/requirements. Please include all relevant information in support of the request. You are requested to follow the principles for requesting deviations, given in the [Deviation Approval Procedure/Design Change Requirements](#).*

##### 3.1.1 | Deviation detail (to be completed by Project developer):

The subject methodology states (p. 6, footnote 20) that “This methodology can only be applied to hull coatings/paints that do not contain biocidal materials. Also, for qualifying under this methodology, all of the environmental benefits of hull coatings/paintings should be clearly demonstrated and be independently verified through life cycle studies following ISO 14040 and ISO 14044.” This footnote survives from earlier versions (now withdrawn) of the methodology, when it was first developed to support projects focused solely on hull coatings (“Reducing Vessel Emissions Through the Use of Advanced Hull Coatings (Version 2.0),” <https://globalgoals.goldstandard.org/423-ee-shipping-reducing-vessel-emissions-through-the-use-of-advanced-hull-coating/>, 2017, p. 5).

Since that time, biocide-free coatings have not achieved substantial market penetration in shipping, mainly because of concerns over their performance (Barnes 2020, <https://www.safinah-group.com/wp-content/uploads/2020/09/The-Naval-Architect-September-2020.pdf>). The use of biocides in maritime coatings is increasingly restricted by international regulations, including those of the International Maritime Organization (<https://www.imo.org/en/OurWork/Environment/Pages/Anti-fouling.aspx>) and the European Union’s Biocidal Products Regulation (<https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr>). Coatings manufacturers and ship owners are exploring and adopting alternatives that reduce biocide release while also supporting substantial energy and emission reductions, while stopping short of eliminating biocides altogether ([https://www.rina.org.uk/Greener\\_smarter\\_anti-fouling\\_solutions\\_on\\_the\\_horizon.html](https://www.rina.org.uk/Greener_smarter_anti-fouling_solutions_on_the_horizon.html); Swain et al. 2022, <https://doi.org/10.3389/fmars.2021.808549>).

Until biocide-free treatments are available and mandated for all commercial vessels and operating profiles, we suggest that owners should be encouraged to invest in high-performance treatments that meet or exceed all relevant regulations regarding biocides, so as to maximize the emission reduction that can be accomplished with advanced hull treatments. We therefore request a general deviation that permits application of the methodology to hull treatments that include biocides in coatings, provided that these treatments conform with all applicable national and international regulations on biocides in maritime coatings.

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

.....

### 3.2 | Assessment of the deviation:

*\*Guidance\* Use the space below to describe how the deviation complies with the requirements, and, where applicable, the accuracy, completeness and conservativeness is ensured. Please include all relevant information in support of the request.*

3.2.1 | Deviation assessment (to be completed by Project developer):

The deviation maintains all aspects of the 2021 methodology for monitoring and calculating emission reductions, including all provisions to safeguard accuracy, completeness, and conservativeness.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

.....

### 3.3 | Impact of the deviation:

*\*Guidance\* Use the space below to describe the impact of the deviation on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. Please substantiate the impact assessment with relevant and verifiable data/information.*

3.3.1 | Impact assessment (to be completed by Project developer):

The deviation involves no changes to fundamental project design, safeguarding principles assessment, SDG assessment, monitoring frequency,

or data quality. The main impact is to broaden the applicability of the methodology to a wider range of advanced hull treatments, thereby incentivizing greater investment in such measures as full hull blasting and application of high-end coatings to older ships, where this is currently not common practice and where biocide-free coatings may not be a viable alternative given the ships' operational profiles. This will result in further reductions of the GHG emissions from maritime shipping.

3.3.2 | VVB opinion (to be completed by VVB, if applicable ):

.....

### 3.4 | Documents:

*\*Guidance\* List of documents provided (note that once a decision has been made by Gold Standard, this deviation form along with supporting documents will be made public on the Gold Standard website. If any of the supporting documents are confidential, please indicate here to ensure they are omitted.)*