

TEMPLATE

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2021**

Version **5.0**

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## A. To be completed by Gold Standard

### 1 | Decision

**1.1 | Date – 09/01/2023**

**1.2 | Decision**

The applied deviation request regarding a delay in the submission of documents for preliminary review is approved. The Project Developer may continue with the process by considering the original project start date as 05/08/2020.

**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_340	
Date of decision	09/01/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	Original submission date 15/11/2022; revised onto new form 23/12/2022	
Project/PoA/VPA	Project	ID – GS11933
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	TMS Tankers Ltd. Shipping Retrofit Project 1	
Date of listing	N/A	
GS Standard version applicable	Gold Standard for the Global Goals	
Date of transition to GS4GG (if applicable)	N/A	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	N/A	
Location of project/PoA/VPA	Host country(ies): There is no host country. Project involves ships mostly travelling in international waters. Shipping emissions and emissions reduction are not included in GHG inventory of any country.	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://platform.sustain-cert.com/public-project/3180">https://platform.sustain-cert.com/public-project/3180</a>	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Request to maintain original project start date as a consequence of changing Gold Standard rules	

	and updates around Preliminary Review, Stakeholder Consultation process and time of first submission while the project was actively being developed. Request relates also to delay in submission of documents for Preliminary Review due to SustainCERT delays in setting up and allowing access to SustainCERT account and app to create the project and upload project documentation.
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Gold Standard methodology "Retrofit Energy Efficiency Measures in Shipping", V 2.0  Gold Standard for Global Goals Principles & Requirements, section 3.4.7.4 ( <a href="https://globalgoals.goldstandard.org/retroactive-projects-eligibility/">https://globalgoals.goldstandard.org/retroactive-projects-eligibility/</a> ), "The following exceptions have been introduced through this Rule Update: 2.1 Requirement for retroactive projects applying the methodology Retrofit Energy Efficiency Measures in shipping"
Specify the monitoring period for which the request is valid (if applicable)	Start date                      End date
Submitted by	Contact person name: Alison Morris
	Email ID: amorris@fremco.com
	Organisation: The FReMCo Corporation Inc.
	Project participant: Yes <input checked="" type="checkbox"/> No <input 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 checked="" type="checkbox"/>  If yes; VVB name:  VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

## 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):

This Deviation Request relates to a request to maintain the original project start of 05/08/2020 as a consequence of the revised Gold Standard rules related to Preliminary Review, Stakeholder Consultation Requirements and the order of activities, including time of first submission. In addition, the Deviation Request is being sought as there were delays on SustainCERT's part in setting up and providing access to the SustainCERT account, which prevented the project developer from being able to create the project and upload documentation to start Preliminary Review.

The project developer (FReMCo) began working with the project owner (TMS Tankers Ltd.) on this project in December 2021. Since this is a retroactive project, the intended steps and timeline for project development were to submit the project for Preliminary Review as quickly as possible, while the Stakeholder Consultation process was getting underway but not yet completed, which is the same process followed in previous and similar Gold Standard projects (e.g. GS11208.) As document preparation was being completed and Stakeholder Consultation was being organized, the project developer became aware of several new/proposed Gold Standard rule updates around both the Stakeholder Consultation process (STAKEHOLDER CONSULTATION AND ENGAGEMENT REQUIREMENTS, Publication Date 14/06/2022) as well as Preliminary Review (REVISION TO PRELIMINARY REVIEW REQUIREMENTS AND PROCEDURE, Publication Date 16.08.2022.) Both of these rule updates impacted project timing, especially since this project GS11933 is retroactive.

In attempts to align with the updated Gold Standard rules, all project documents were prepared and ready for submission for Preliminary Review prior to August 2022, since the project start date was intended to be 05/08/2020. The Stakeholder Consultation

session planning and organization was well underway, with the initial Consultation session held on 09 August 2022, after allowing sufficient time (minimum 30 days ahead of the session) to send invitations well ahead of the session itself.

TMS Tankers Ltd. opened their Registry account, approved on 04 August 2022, which was still within 2 years of the intended project start date of 05/08/2020. The Registry invoice was paid by TMS on 19 August 2022. TMS received notice that the Registry account was approved and accessible on 23 August 2022; however, access was not granted to the SustainCERT app until 06 September 2022, therefore the project could not be created until after that date. During these delays (we have provided emails exchanged with SustainCERT and Gold Standard about the delays), the time of first submission (Preliminary Review) was also delayed to 08 September 2022.

In the case of this shipping project, with 47 unique ships included each with a different retrofit/start date, the project start date is determined by the date associated with the earliest retrofitted ship. This date is 05/08/2020 (see table below from PDD.) The project can then have a time of first submission within two (2) years of this earliest/oldest date, as per the Gold Standard rule update copied below, and also noted within the PDD:

*As noted in Gold Standard for Global Goals Principles & Requirements, section 3.4.7.4 (<https://globalgoals.goldstandard.org/retroactive-projects-eligibility/>), "The following exceptions have been introduced through this Rule Update:*

*2.1 Requirement for retroactive projects applying the methodology Retrofit Energy Efficiency Measures in shipping*

*Considering the unique nature of the shipping sector activities and the intricate methodology requirements for data collection, the prior consideration requirements have been revised for retroactive project applying the methodology "Retrofit Energy Efficiency Measures in shipping". The projects applying this methodology can submit the required documents to Gold Standard for preliminary review within two years of its start date. This rule change is applicable with effect from the date of publication."*

The initial project start date was intended to be 05/08/2020 as stated above, the date associated with the earliest retrofitted ship (see Table 8 below, pasted from the PDD)

however as the Gold Standard rules changed while we were actively working on this project, and delays were experienced in being able to access the SustainCERT account to create and submit the project, we are therefore requesting that the original start date of 05/08/2020 be accommodated and maintained. Should that not be acceptable, then the project start date would be changed to 23 August 2020, considering that the project owner obtained Registry access only on 23/08/2022.

**Table 1. Ship names, IMO numbers, retrofit application date and retrofit measures, as listed in previous table**

Ship number	Vessel	IMO No	Retrofit	
			Application date <sup>1</sup>	Measures
1	Conquistador	9724635	20/4/2021	2
2	Pink Sands	9724647	25/5/2021	2
3	Raiatea	9580376	18/9/2021	2,3
4	Andama	9480526	23/8/2020	2,3,5
5	Robusto	9386512	12/8/2020	2,3,5
6	Flecha	9284570	25/10/2021	2
7	Amalfi	9465801	21/8/2021	2
8	Malindi	9363015	14/1/2022	2
9	Tampa	9363027	27/12/2021	2
10	Oregon	9721683	14/1/2021	2
11	Petani	9363065	6/10/2021	2
12	Kelly	9768227	27/9/2021	2
13	Nasaka	9602423	15/4/2021	2
14	Matisse	9677375	4/10/2021	2
15	Saldanha	9268992	21/4/2022	2
16	Ligari	9279513	12/5/2022	2
17	Netadola	9406453	10/6/2022	2,4
18	Sidari	9363053	25/6/2022	2
19	Madeira	9355161	30/6/2022	2
20	Partagas	9272345	20/7/2022	2
21	Fakarava	9634701	30/7/2022	2,4
22	Majorca	9294109	1/9/2022	2
23	Belmar	9516959	5/8/2020	2
24	Bora Bora	9621596	10/7/2021	1,2
25	Calida	9522128	25/9/2021	2
26	Daytona	9528043	11/9/2021	2
27	Desimi	9395305	19/11/2021	2
28	Lacerta	9621601	9/6/2021	1,2
29	Malibu	9776731	5/11/2021	2
30	Matala	9776743	1/10/2021	2
31	Saga	9528031	12/11/2020	2
32	Samsara	9792228	7/12/2021	2

<sup>1</sup> Recent and future dates are estimates, shown in italics

33	Stamos	9592276	17/9/2021	1,2,4
34	Waikiki	9776755	24/11/2020	2
35	Bonita	9297541	15/6/2022	2
36	Fontana	9792541	15/7/2022	2
37	Karekare	9787986	15/8/2022	2
38	Lipari	9529487	15/5/2022	1,2
39	Marfa	9773478	15/5/2022	2
40	Montego	9297553	15/7/2022	2
41	Monterey	9377779	15/5/2022	2
42	Nantucket	9600865	15/6/2022	2
43	Petalidi	9529475	15/5/2022	2
44	Venice A	9283306	15/7/2022	2
45	Zuma	9308821	15/11/2022	2
46	Freud	9804461	15/9/2022	2
47	Tamara	9600889	15/6/2022	2

Every attempt was made to submit the project within the two (2) year period allowed for by the rule update mentioned above, however since the Gold Standard rules around submission dates, Preliminary Review, Stakeholder Consultation and order of activities were all being revised while this project was well underway, as well as the SustainCERT account opening being delayed and this being outside of our control, we believe that the original start date of 05/08/2020 should be accepted. If this is not accepted, then the revised proposed start date of 23/08/2020 should be acceptable and within the Gold Standard rules, however this change would result in two (2) ships needing to be removed from the project. This was noted as a possible change within the revised project documentation. The earliest retrofit date, which corresponds directly to the project start date, would then be 23 August 2020. Adjustments (reductions) to the ex-ante estimates have been made in the revised project documents to demonstrate the impact, however the original PDD would be reinstated should the start date of 05/08/2020 be accepted and all 47 ships remain in the project.

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



*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

N/A

### 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):

Should the initial start date be acceptable, there are no changes to the project.

Should the start date of the project need to be revised due to Gold Standard rule changes that occurred while the project was being developed and delays in the ability to submit project documentation due to delays in being able to access the SustainCERT account of the project owner, there is still virtually no impact on the project since it is at the Preliminary Review stage. Unfortunately, in that case 2 ships would then be removed from the project. Adjustments (reductions) to the ex-ante estimates have been made in the revised project documents to demonstrate the impact, however the original PDD would be reinstated should the start date of 05/08/2020 be accepted and all 47 ships remain in the project.

No other impacts to the project.

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

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

N/A

### 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):

Should the initial start date be acceptable, there are no changes to the project. The deviation request would allow the initial start date of 05/08/2020 to stand and 47 ships would remain in the project activity.

Should the start date of the project need to be revised due to Gold Standard rule changes that occurred while the project was being developed and delays in the ability to submit project documentation due to delays in being able to access the SustainCERT account of the project owner, there is still virtually no impact on the project since it is at the Preliminary Review stage. However, 2 ships would be lost from the project activity, and the ex-ante emission reductions would need to be decreased slightly as 2 ships would need to be removed from the project given a revised start date.

No other impacts to the project.

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

***\*Guidance\*** If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

N/A

### 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.)*

- Revised Draft PDD following Preliminary Review Round II *[some CONFIDENTIAL information, to be redacted before being made public]*
- Revised Stakeholder Consultation Report, following completion of the SFR round as well as Preliminary Review Round II
- Revised Preliminary Review Request form, following Preliminary Review Round II

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> </ul> Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption