

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 – 30/06/2023**

**1.2 | Decision**

The applied deviation request is approved.

The project is granted deviation from para 4.1.49.(b) of the [Principles & Requirements – Gold Standard for the Global Goals](#). The project may proceed for listing and design certification provided that project is in compliance with other applicable requirements.

The validating VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above-mentioned conditions and provides its opinion in the Validation Report.

Certification body shall review both the project developer's submission and the VVB's opinion of the same and take appropriate steps.

**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_431	
Date of decision	30/06/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	24/04/2023	
Project/PoA/VPA	Project	ID – GS12166
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Estimation of the GHG emissions of the " Grupo Transportes Monterrey S.A.P.I." vehicle fleet	
Date of listing	March 27, 2023	
GS Standard version applicable	Version 2.0	
Date of transition to GS4GG (if applicable)	--	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	--	
Date of design certification/inclusion (if applicable)	--	
Location of project/PoA/VPA	México	
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 checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Retroactive design certification	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	PRINCIPLES & REQUIREMENTS 5 PROJECT CYCLE. (g) RETROACTIVE DESIGN CERTIFICATION 5.1.51 Retroactive Projects shall submit for Preliminary Review within one year of the Project Start Date. 5.1.52 For certain Methodologies and Gold Standard Certified Impact Statements, the Design	

	Certification Requirements for a Retroactive Project may differ. Likewise, some Product Requirements require Prior Consideration of revenues in order to be eligible to receive an Issued Product and may limit or extend the maximum period of Certification prior to Design Certification.
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/01/2022      End date
Submitted by	Contact person name: Angélica Velázquez Montero Email ID: avelazquez@cinpro.mx
	Organisation: Consultoría en Ingeniería de Proyectos S. de R.L.
	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 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):

We request to keep the starting day of the certification as 01/01/2022 which is more than 1 year from the submission day.

The deviation presented is found in: Gold Standard for the Global Goals:  
PRINCIPLES & REQUIREMENTS  
5 PROJECT CYCLE.

(g) RETROACTIVE DESIGN CERTIFICATION

5.1.51 Retroactive Projects shall submit for Preliminary Review within one year of the Project Start Date.

5.1.52 For certain Methodologies and Gold Standard Certified Impact Statements, the Design Certification Requirements for a Retroactive Project may differ. Likewise, some Product Requirements require Prior Consideration of revenues in order to be eligible to receive an Issued Product and may limit or extend the maximum period of Certification prior to Design Certification.

Grupo Transportes Monterrey (GTM) is a company in the road freight transportation sector in Mexico, where the baseline scenario is the situation where, in the absence of project activity, the fleet used for freight transportation in the different routes remain the same, without changing technology nor fuel type. Throughout the project, freight is transported using less GHG-intensive modes of transport.

The baseline considers an annual fleet growth of 12.5%. The existing fleet has 94% diesel vehicles and 6% Compressed Natural Gas (CNG) vehicles, which has a correct maintenance plan. According to the methodology, the average tons transported annually, and the total distance traveled are considered.

The project includes renewing vehicles from the existing fleet, by more efficient vehicles in terms of energy and emission, maintaining the CNG-Diesel vehicle fleet composition and the annual growth of the baseline.

According to the methodology, the project boundary includes the following:

- (a) The geographical area in which these vehicles operate;
- (b) Auxiliary facilities such as fueling stations, workshops, and service stations that are used by the vehicles in the fleet.

The conditions which govern the operation of the fleet (e.g. tariffs, regulations) should be homogeneous within the project boundary. The origin and end points of the routes carried out, where complete coverage is observed in Mexico, reaching the 32 states.

The applied methodology is AMS-III.S. Small-scale Methodology; Introduction of low-emission vehicles/technologies to commercial vehicle fleets.

#### The reasons for presenting the project in March 2023:

Several events make the project to be presented later than one year after the starting day. Among them are:

- The information had to be compiled from the company's different transportation routes. At the beginning of 2022, this information was not centralized, so it took several months to gather it and thus obtain a reliable database that would allow the application of the AMS-III.S. methodology.
- The COVID-19 variant omicron wave occurred in early and mid-2022 (see figure below). This delayed the collection and processing of the information, so the calculations and application of the mentioned methodology were ready by the end of September 2022, additionally, the final documentation was completed by last November.

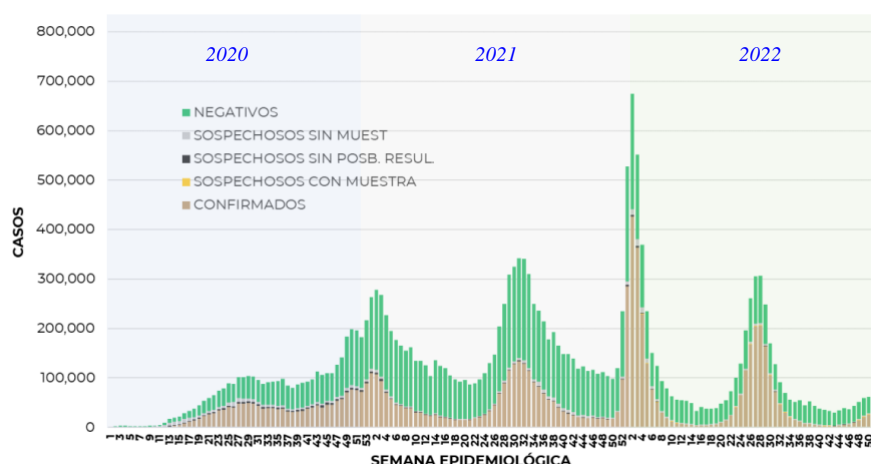



Fig 1. Covid-19 evolution in Mexico by epidemiological week.

Source: Mexico Health Secretary, 2022. Covid-19 Technical weekly report 12.27.2022. Available online in: <https://bit.ly/41F3zPM>


- At a Mexican level, this project is new for the stakeholders. Therefore, the relevant internal procedures took long time to receive approval from the sustainability direction and general direction (two different departments) of GTM transport company.
- A search for similar freight transport projects did not identify any similar ones, so the learning process for the development of this type of projects was slower.



IMPACT REGISTRY

CREDITS

PROJECTS

 LOGIN


ALL PROJECTS

































Project Status

Country

Project Type: Energy Efficiency - Transport Sector



X CORSIA


 Search...

GS ID	PROJECT DETAILS	STATUS	SDGS	PROJECT TYPE	COUNTRY	ACTIONS
GS11933	TMS Tankers Ltd. Shipping Retrofit Project 1 by TMS TANKERS LTD.	 Planned	  	Energy Efficiency Transport Sector	Greece	<a href="#">VIEW</a>
GS11567	Battery Electric Vessels for Costa Rica by Grütter Consulting AG	 Planned	  	Energy Efficiency Transport Sector	Costa Rica	<a href="#">VIEW</a>
GS11577	Programme of Activities for Shipping Energy Efficiency Retrofits by Barry Rogliano Salles (Genève) SA.	 Planned	  	Energy Efficiency Transport Sector	Switzerland	<a href="#">VIEW</a>
GS11208	Golden Union Shipping Retrofit Project 1 by Golden Union Shipping Company S.A.	 Estimated	  	Energy Efficiency Transport Sector	Greece	<a href="#">VIEW</a>
GS7608	EcoCar Solaire by myclimate Foundation	 Planned	      	Energy Efficiency Transport Sector	Senegal	<a href="#">VIEW</a>
GS5836	VPA 3 Project - Application of advanced hull coatings to reduce shipping fuel consumption by International Paint Limited	 Estimated	  	Energy Efficiency Transport Sector	International	<a href="#">VIEW</a>
GS5406	Programme for the application of advanced hull coatings to reduce shipping fuel consumption (PAHSF) VPA No. 2 by QK TS Pvt. Ltd.	 Estimated	  	Energy Efficiency Transport Sector	International	<a href="#">VIEW</a>

Gold Standard

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 EXPORT

The screenshot shows the Verra Project Search interface. At the top, there are navigation links: NEWS, PUBLIC REPORT, OPEN AN ACCOUNT, and LOGIN. Below this is a tabbed interface with 'All Projects', 'Registered', 'Pipeline', 'Open Comment Period', 'VCUs', and 'Buffer'. The 'Registered' tab is active. On the left, there is a 'PROJECT SEARCH' sidebar with filters for NAME, PROJECT TYPE (with 'Transport' selected), METHODOLOGY (with 'AMS-III.S.' selected), STATUS, COUNTRY/AREA, REGION, and CREDITING PERIOD. The main table displays two projects:

ID	Name	Proponent	Project Type	AFOLU Activities	Methodology	Status
3657	Grouped Commercial Vehicle EV Project in India	Multiple Proponents	Transport		AMS-III.S.	Registration and verification approval requested
2604	Grouped CNG Vehicles Project in India	EKI Energy Services Limited	Transport		AMS-III.S.	Registration and verification approval requested

- Contact with the other project stakeholders began once all the information was organized (end of November 2022), and then the Gold Standard registration process started. However, due to changes inside Gold standard we received a response after three months of our original contact.

Date	Event
2022-12-08	First contact with GS Registry Application
2022-12-14	Answer of GS requesting the documents
2022-12-14	Sending again of requested documents
2022-12-16	CINPRO's question about document status
2022-12-21	CINPRO's question about document status
2023-01-20	CINPRO's question about document status
2023-01-26	GS's response requesting the documents
2023-01-27	Sending again of requested documents
2023-01-28	CINPRO's question about document status
2023-01-31	CINPRO's question about document status
2023-02-02	GS's response requesting the documents
2023-02-02	Sending again of requested documents
2023-02-10	GS's response requesting the documents
2023-02-12	GS's response requesting the documents
2023-02-12	Sending again of requested documents
2023-02-15	CINPRO's question about document status
2023-02-17	Answer of GS with Invoice from our finance system for paid
2023-02-17	CINPRO send proof of payment
2023-02-23	GS send invoice
2023-03-02	Access to GS Registry

This deviation does not affect the applicability, safeguards or compliance with other Gold Standard requirements.

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

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

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### 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):

As stated in the requirements, in order to achieve Certification with Gold Standard, all Projects shall contribute to the Vision and Mission of Gold Standard, applied specifically through the following Eligibility Principles and Requirements.

- **Additionality:** Deviations does not affect the additionally of the project.
- **Project Scale:** The deviation does not affect the capacity of the project.
- **Applicability of Methodology:** The project is implemented as described in the registered project documentation.
- **Stakeholder feedback:** It is considered that there is no need to consult the stakeholders about changes, since they are not affected by the implementation of the project.
- **Sustainable Development Assessment:** The deviation does not affect Sustainable Development Goals.

As described, the deviation does not affect the different requirements of Gold Standard, so the accuracy, integrity, and conservatism of the project are guaranteed.

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

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

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### 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 will not impact project design, safeguarding principles assessment, SDGs assessment, emissions reductions, monitoring frequency, data quality or any other potential risk or any other relevant aspect of the project, as this is a deviation ex-ante of project implementation.

The project will be in compliance with the relevant Gold Standard eligibility criteria. The Project will abide by the Programme of Activity requirements.

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

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

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### 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.)*

Version number	Release date	Description
1	03.01.2020	Registered CDM Transport Projects and Certified Emission Reductions <a href="https://apps1.semarnat.gob.mx:8443/dgeia/compendio_2021/dgeiawf.semarnat.gob.mx_8080/ibi_apps/WFServlete239.html">https://apps1.semarnat.gob.mx:8443/dgeia/compendio_2021/dgeiawf.semarnat.gob.mx_8080/ibi_apps/WFServlete239.html</a>
2	17.12.2022	Weekly Technical Report COVID-19 MEXICO <a href="https://www.gob.mx/cms/uploads/attachment/file/788069/Informe_Tecnico_Semanal_COVID-19_2022.12.27.pdf">https://www.gob.mx/cms/uploads/attachment/file/788069/Informe_Tecnico_Semanal_COVID-19_2022.12.27.pdf</a>