

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 27/07/2023

1.2 | Decision

The deviation request is **Approved**. However, project developer shall make note of the following requirements/recommendations –

The existing stakeholder consultation meetings are deemed sufficient; however, a virtual SFR round of 60 days shall be required where GS requirements on the grievance mechanism and invitation to the minimum group of stakeholders to be consulted shall be met in accordance with the [Stakeholder Consultation and Engagement Requirements](#).

Please note that if during certification process any major gaps from the stakeholder consultation process are identified, GS retains the right to require the projects to do a physical stakeholder consultation.

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_477	
Date of decision	27/07/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	05/07/2023	
Project/PoA/VPA	Project	ID – GS12197
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	d'Amico Società di Navigazione SpA Shipping Retrofit Project 1	
Date of listing	28/06/2023	
GS Standard version applicable	GS4GG	
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	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 checked="" type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/4166	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input checked="" type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Stakeholder Consultation process, international shipping projects	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	GS STAKEHOLDER CONSULTATION AND ENGAGEMENT REQUIREMENTS Version 2.1 Sections 3.1.3 and 3.6.5	

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.	
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
	<p>Project has only just been listed and will be submitted for internal SustainCERT Validation shortly.</p> <p>If yes; VVB name: N.A.</p> <p>VVB Staff name(s):</p>	
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):

Gold Standard Stakeholder Consultation Engagement rules require an in-person, physical meeting. However, it is felt that for projects of this nature (involving international shipping with no host country and no project site) the alternative of holding a virtual (on-line) Stakeholder Consultation session meets all of the goals of this process.

As per the Gold Standard Stakeholder Consultation and Engagement Requirements:
"The aim of the stakeholder consultation is to meaningfully engage stakeholders and

discuss potential environmental, social and economic impacts (both positive contributions and potential risks) that projects may have during the design, planning, implementation and operational stages of the project and to establish an ongoing mechanism for feedback in consultation with stakeholders.” Specifically, section 3.1.1 of the Stakeholder Requirements outlines the objectives as:

- a. to identify, engage and consult stakeholders in a meaningful manner to improve project design and its outcomes, and*
- b. to inform stakeholders about the projects and discuss their likely impacts (both positive and negative) during the design, planning and implementation stage and relevance to stakeholders, and*
- c. to establish an ongoing engagement process for stakeholders to provide input, feedback and to raise concerns throughout the project life.*

Section 3.6.2 goes on to say the following: *“The objective of the physical meeting is to inform the relevant stakeholders of the project details and ensure that stakeholders are provided with an opportunity to influence project design, implementation and operation by interacting with the project developer (and also amongst each other) and exchanging views and concern(s) in a free and transparent manner.”*

The virtual Stakeholder session held for this specific d’Amico project, and for previous projects relying on the “Retrofit Energy Efficiency Measures in Shipping” methodology as well as the previous Advanced Hull Coatings methodology, met all of these objectives.

A physical meeting may be relevant for local stakeholders’ participation. However, the project involves ships that are mostly at sea. Hence there are no local stakeholders. Stakeholders for this project are those that are interested in the global marine environment, climate change mitigation opportunities in shipping, technology providers, etc.

Since for this project (comprising energy efficiency in international shipping) the stakeholders are dispersed in multiple global locations, and in keeping with stakeholder consultations conducted in previous Gold Standard shipping projects, a physical meeting was neither necessary nor feasible. Since there is no host country for this project, and no local area *per se*, holding a physical stakeholder meeting would have required most attendees to travel in order to participate, likely by air or

train, which would have been prohibitive for many, as well as being contrary to the climate mitigation and emission reduction goals of both the project and the Gold Standard. A physical meeting would have greatly reduced the possibility for genuine stakeholders to participate. Therefore, a virtual/online meeting was considered most appropriate, permitting the maximum level of participation and the most fair, equitable and transparent manner of engaging stakeholders in this situation. Invitees who could not participate in the live video conference meeting could send in written comments by email.

There are numerous precedent examples from past Gold Standard projects including International Paint (GS 2767, GS 5406, GS 5836), Golden Union Shipping (GS 11208) and TMS Tankers Ltd. (GS 11933) where this same process was carried out and accepted by Gold Standard and SustainCERT due to the unique nature of these projects. There is no single location for an in-person event in this case, nor multiple locations that are realistic or make sense. The ships are traveling in international waters and there is no host country for any of the projects. In addition, the relevant stakeholders are scattered globally. Again, an in-person event (and particularly several in-person events) would be cost-prohibitive and would be encouraging stakeholders from many different countries to travel (mostly by air), which would in fact indirectly increase emissions associated with this project. Many companies have gone as far as restricting employee travel to reduce expenditures and emissions from employee travel, and it is our strong belief that attendance during such a remote session as was held in this case was actually much higher than it would have been if the meeting was held in-person.

It is requested that for some specific projects such as this one (GS 12197), the in-person Stakeholder meeting requirement be not required as long as the session held virtually meets the stated aims of engaging stakeholders and allowing for free, interactive and transparent discussion amongst the participants and the project developer/owner.

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):

It is felt that the Stakeholder Consultation process carried out in this and other similar projects complies with, and meets the stated aims of, the Gold Standard Stakeholder engagement and consultation requirements in every way, other than the fact that the meetings were not able to be realistically held in-person.

There are no impacts whatsoever on the overall project and the accuracy, completeness and conservativeness of the project is ensured and unchanged by this deviation.

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):

There is no impact on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of 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.)*

There are no other documents provided with this Deviation Request. The Stakeholder Consultation Report for this project, which has been updated to reflect the Stakeholder Feedback Round process and outcome, has already been uploaded to the project account on the SustainCERT app. There are also several project documents available on the SustainCERT app related to the other similar projects referenced above, where remote stakeholder consultation sessions were also carried out, namely International Paint (GS 2767, GS 5406, GS 5836), Golden Union Shipping (GS 11208) and TMS Tankers Ltd. (GS 11933).

Version number	Release date	Description
5	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

		<ul style="list-style-type: none"> - any previous deviations/design changes approved <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption