

FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: 12/11/2024

VERSION: 6.0

NEXT PLANNED UPDATE: 12/11/2026

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.

Table of Content

1 General Guidelines.....	2
1.1 Applicability.....	2
2 Submission of deviation form	2
3 Implementation of deviation decision	2
4 Decision summary	4
4.1 General information.....	4
4.2 Decision.....	4
4.3 Applicability to other activities	5
5 Deviation Request Details.....	6
5.1 Submitted by.....	6
5.2 Details of the entity and its representative submitting the form	6
5.3 Background information	6
5.4 Project deviation history	7
6 Deviation detail	7
6.1 Standard document reference.....	7
6.2 Description of the deviation	8
6.3 VVB information.....	10
6.4 VVB's assessment	10
6.5 Documents:	11

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEV_197
Date of decision	19/08/2025
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 | Decision Summary

The request is approved.
Under GS4GG Principles & Requirements, the 24 month requirement for initiating the first verification is calculated from either the project implementation date or the design certification date, whichever is later.

Hence, in this case Gold Standard approves a one time exemption from the 24 month rule, recognising that verification could not be initiated until after the final validation approval on 04/03/2024.

The Project Developer may proceed with verification and to claim up to two years of credits prior to the site visit date (04/06/2024).

4.2.2 | Directions for the project developer/CME, if applicable

PD must include transparent evidence of site visit and verification initiation dates in the revised submission.

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

VVB shall cross check in the verification report that crediting covers no more than two years prior to the site visit date (04/06/2024).

VVB to ensure all related evidence (including CLRQ responses and validation approval date) is clearly documented in the verification package.

...

4.2.4 | Directions for the Gold Standard, if applicable

NA

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)	
NA	

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.

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 :	Muhsin Dervişoğulları
Email ID ⁴ :	muhsin.dervisogullari@sankoenerji.com.tr
Organisation: ⁵ :	Sanko Enerji Sanayi ve Ticaret A.S. (10215857)
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	☐ VPA
GS ID	GS7741		
Host country(ies)	Turkey		
Project Title	Gazi-9 WPP		
Registry link	https://assurance-platform.goldstandard.org/projects/GS7741		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding	☐ Listed	☒ Certified design	☐ Certified project ☐ Other <i>If other, specify here</i>

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

date of latest status	10/08/2022			
Applied version of Standard	☒ GS4GG ☐ Previous version of Gold Standard			
	Version no.			
	☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
Transition date, if applicable	From previous GS version to GS4GG		dd/mm/yyyy	
	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 Insert name here			

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	DEV_729	
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	

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 & REQUIREMENTS
	Version	v. 2.1
	Paragraph	Para 5.1.25 (This is not exactly correct, because the verification process should not start final approval documents by Gold Standard which date is 04/03/2024 for this project.)

6.2 | Description of the deviation

Title	Deviation due to verification start after GS final document approval	
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)
Relevant monitoring period, if applicable	Start date	04/06/2022
	End date	03/06/2024
Summarise the changes	In the first round assessment of the Gazi-9 Wind Power Plant under the Gold Standard (GS), a question was raised as to why the verification process had not started within the 24-month period, given that the registration date appears as 10/08/2022. However, the actual effective registration date is 04/03/2024, when the validation report and the Project Design Document (PDD) were officially approved by GS. As you are aware, verification activities can only commence after the final validation approval is completed by GS which is 04/03/2024. Accordingly, the project participant initiated the verification process immediately after validation was finalized. The site visit was carried out on 04/06/2024 with the participation of the VVB, the project developer, and the consultant, on the first available date provided by the VVB. It appears that some of these details may not have been fully known during the GS first round review, and as such, the question regarding the 24-month rule was raised again. Consequently, the VVB, RINA, as seen in the attached CL-143 form, has requested clear written clarification and confirmation regarding the timeline and rules mentioned above. RINA has stated that, without resolving this ambiguity, they will not submit the revised verification report or respond to the first-round queries. In the meantime, the project participant submitted a deviation request decision dated 29/09/2024 (Ref. No. 729-submission date 31/05/2024). However, since the deviation form did not mention the physical site visit that took place on 04/06/2024, GS noted in Section 5 of its decision that there was no evidence that verification had begun, and therefore did not approve the request for crediting from the start of the crediting period or starting date of renewable energy production. As a result, only the final two years were approved for issuance. The project participant, with the support of the VVB, accepted this outcome and continued the process accordingly, subsequently submitting the report to GS. Nevertheless, in the first round review, GS once again referred to the registration date as 10/08/2022 and questioned whether the project met the 24-month rule. This issue has now brought the process to a standstill, creating a critical situation for the project participant. The VVB has explicitly refused to proceed without an official confirmation regarding the registration date and the applicability of the 24-month rule. As per GS procedures, verification cannot start before the final PDD and validation report are approved. Therefore, the verification process could only begin after 04/03/2024.	

	In this critical phase, we kindly request your written confirmation on one of the following points: • A formal written confirmation stating that the verification process may proceed as outlined in the Monitoring Report and/or the project participant's submission; And • A clear written statement from the GS reviewer (or relevant team) confirming that the 24-month rule is calculated based on the GS validation approval date of 04/03/2024, and that the project is therefore within the valid period until 04/03/2026. Once such written confirmation is provided, the DOE will be able to submit both the revised verification report and the second-round responses to GS. Since the GS first-round comments were received on 15 April 2025, numerous emails have been sent, meeting requests have been made, and this clarification form has been prepared again at GS's request. All supporting documents and explanations are attached and clearly demonstrate the situation described above. We kindly appreciate your understanding and support in this matter and respectfully request your written confirmation so that the process may proceed without further delay. Should any additional information or documents be required, we are more than willing to arrange a brief meeting with the reviewers or provide any necessary clarifications.
Reason for deviation	The first-round assessment of the Gazi-9 WPP project under the Gold Standard (GS), regarding why verification did not begin within 24 months of the apparent registration date (10/08/2022). The project participants clarify that the actual effective approval date is 04/03/2024, when the PDD and validation report were officially approved by GS after which verification began promptly. A site visit was conducted on 04/06/2024 with all parties present. Due to confusion about the registration date, the VVB (RINA) has requested a formal written confirmation from GS confirming that the 24-month rule is based on the validation approval date of 04/03/2024, not the earlier administrative registration date. Without this confirmation, RINA will not submit the revised verification report or responses to GS's comments. The project is currently stalled, and formal clarification is urgently needed. The project team respectfully requests GS to provide written confirmation to resolve this issue and allow the process to proceed. Supporting documents are attached, and the team is available for any further clarification or meetings as needed.
Proposed resolution	Within the GS4GG framework, the project has been monitored in full compliance with all applicable Gold Standard regulations since the commencement of renewable energy production. Although the design certification date is 10 August 2022, the performance certification review (verification) could not begin prior to the issuance of the final approval document by Gold Standard, which was granted on 04 March 2024. Following this final approval and with GS's awareness and consent, the verification process commenced. A physical site visit was conducted in June 2024 with VVB, and the Monitoring Report was submitted

	accordingly. However, based on comments received during the GS review, the VVB has explicitly refused to proceed without an official confirmation regarding the registration date and the applicability of the 24-month rule.						
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"> <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>XYZ tCO₂e</td><td>XYZ tCO₂e</td></tr> <tr> <td></td><td></td></tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO ₂ e	XYZ tCO ₂ e		
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation						
XYZ tCO ₂ e	XYZ tCO ₂ e						
Summary of the impact							
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 Deviations Request Requirements and Procedures or request is submitted by the VVB.</i>	Yes ☐ No ☐ <i>If answer is yes, fill the information in section 6.4 below.</i>
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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. DEV_729

Document 2. CLRQ-143

Document 3. CLRQ-202

Document 4. GS7741_GS4GG Design Review_Final_04032024

Document 5. GS7741_PERR_MP1_CP1_Review Form_Round 1_with PP response

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