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

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-423	
Date of decision	08/06/2026	
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 deviation request is conditionally approved as above:

- The project developer shall follow the latest decision from GS regarding the rejection of the capacity addition of the 8 units. The FAR#4 is therefore no longer valid and the project developer could continue with the Performance Review and Design Certification Renewal.
- Any future new capacity addition to the existing capacity in the Designed Certified PDD via design change request will be considered separately following the GS requirement Design Change Request Requirements and Procedures.

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

The project developer shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the project developer. The project developer shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision. The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the project document.

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

The validating/verifying VVB shall, through appropriate means at disposal, evaluate that the project's compliance with the above-mentioned conditions and provide VVB opinion in the validation/verification report.

4.2.4 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the project developer and the VVB for appropriateness, accuracy and consistency.

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)	

[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] :	Ersin AYDIN
Email ID[4] :	eaydin@enerji.istanbul
Organisation:[5]:	İstanbul Enerji San. Ve Tic. A.Ş.
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 GSXXXX	☐ VPA
GS ID	GS7738		
Host country(ies)	Türkiye		
Project Title	IBB Seymen Landfill Gas to Energy Project		
Registry link	**https://registry.goldstandard.org/projects/details/2583**		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below *Insert text here*		

Certification Status and corresponding date of latest status	☐ Listed	☒ Certified design	☐ Certified project	☐ Other *If other, specify here*
	dd/mm/yyyy	*11/04/2022*	*dd/mm/yyyy*	*dd/mm/yyyy*

[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

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	DEVRQ-95		
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		
	Summary of the findings *FAR # 4: In line with GS4GG Design Change Requirements para 3.1.5, in case the installed capacity will be Increased to 53.420 MWm/51.972 MWe after registration, project shall apply for design change.*		

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	V2.1
	Paragraph	5.1.22

6.2 | Description of the deviation

Title	Alteration Request to FAR Raised During Design Certification

<table>
<tr><td rowspan="2">Confirm the nature of changes related to deviation</td><td colspan="2">☐ Temporary
(e.g. not expected to occur beyond one monitoring period)</td><td>☒ Permanent
(e.g. deviation from requirements prior to submission for certification)</td></tr>
<tr><td colspan="3">A specific request which will effect the project, once for this renewal and will not effect future Design Certification Renewals.</td></tr>
<tr><td rowspan="2">Relevant monitoring period, if applicable</td><td>Start date</td><td colspan="2">NA</td></tr>
<tr><td>End date</td><td colspan="2">NA</td></tr>
<tr><td>Summarise the changes</td><td colspan="3">During Design Certification, a FAR has been opened by GS (FAR#4) which mandates the project to go through Design Change if the capacity is increased to 53.420 MWm/51.972 MWe after registration. The design change of request of the project has been rejected by GS recently which causes this FAR not to be closed and prevents successful verification and design certification renewal processes. We wish this FAR to be removed or altered so that we can proceed with finalizing the performance review and design certification renewal processes which have already been started.</td></tr>
<tr><td>Reason for deviation</td><td colspan="3">1) During validation and initial Design Certification the project was presented in the PDD and relevant documents with a license capacity of 51.972 MWe however stated that this capacity would be reached in stages and that the initial validation was made when the project had a smaller capacity in operation. The validated PDD already states the full capacity and that other stages will be implemented. Therefore the implementation of further units to reach the license capacity can not be considered as capacity additions/increases to the original design but as milestones of the original project design. That being said the additionality of the project was carried out for 25.452 MWe part only which is constituted by the 18 units already implemented at the time which has to be updated and demonstrated that the project is still additional with the additional units being implemented.
2) The project is currently undergoing verification and its in GS Review stage. GS has made a comment in the review phase, referencing FAR#4 from design certification which states “In-line with GS4GG Design Change Requirements para 3.1.5, in case the installed capacity will be Increased to 53.420 MWm/51.972 MWe after registration, project shall apply for design change.
This FAR and the review comments on the verification also includes the idea the that the project has to still be additional.
3) The project also recently underwent Design Change application. The stage is currently “rejected” due to not submitting the validation report within 1 year of capacity increase (Details to this issue is also given in this list. According to GS review comments on verification, the first verification will have to wait for the design change to be completed to close all comments from GS. It also must be noted that this design change includes the projects operational capacity for when it increased to</td></tr>
</table>

	37.726 MWe with 26 operational units in total and not to the full capacity stated in the license and the original registered PDD. However this capacity and the design change covers the actual values for the first crediting period. 4) For these reasons the project is still in Certified Design phase and did not claim Certified Project status, since the first verification is not complete. The first monitoring period of the project is 26/12/2020 – 25/12/2025. Taking this period into account, the deadline to submit a Design Certification Renewal was approaching therefore a validation report for this have been submitted within the time frame, received review findings from GS but this was also pending the design change outcome to proceed further. 5) Our request is that the FAR#4 raised during Design Certification to be either removed or amended so that we can finish the performance review of the project (With the capacity of the project at validation, not claiming ERs from the increased capacity) and to be able to finalize the Design Certification Renewal with the validated capacity as well. 6) Another point out is that FAR #4 states: "in case the installed capacity will be Increased to 53.420 MWm/51.972 MWe after registration" The project still did not reach this capacity with the increases made, the current capacity is 37.726 MWm / 36.764 MWe. Therefore this maybe interpreted as FAR#4 is not relevant yet since the capacity mentioned hasn't been reached. 7) Another request is that even though the capacity increase for the inclusion of 8 units have been rejected due to passing of the 1 year deadline, the project still makes capacity increases in order to reach the mentioned 53.420 MWm capacity and there are new units to be implemented, we request that even though the 8 units which were installed and got rejected in the design change, we wish to be able to apply for the design change of the new coming capacity increases provided we apply for design change in time for those, excluding the rejected 8 units. 8) The reason for missing the 1 year deadline for the rejected design change, as also explained in the review report for the design change is: The reasons for this is explained below, to make the topic more understandable the whole story of missing the deadline and not including the 5 new units in the design change is explained together; The PP is a municipality-owned company which operates strictly in accordance with the Turkish Public Procurement Law. The procedures for applying for design certification, performance certification, design change, design certification renewal, etc. create the need for the PP to contract a consultant as a Project Developer and a VVB for validation/verification. In order for the PP to be able to contract a company for these services, the aforementioned law is applied.

	The reasoning for not including the added power units in the design change, as well as for not meeting the one-year deadline for the submission of the design change, arises from the legal constraints with which the PP must comply due to being a municipality-run company. The PP had, and still has, no legal possibility to include the additional units in the design change, nor any possibility to have met the deadline under this law, as explained below: The initial service procurement contract with the consultant company was launched in 02/2019 and was defined as the completion of the design certification works before Gold Standard for the facility consisting of a total of 18 engines, and the work was commenced accordingly. During this period, the work took longer than expected, and before the process could be completed, the capacity of the facility increased. According to the Public Procurement Law, matters such as changing the scope of the procured service, re-tendering for the same subject matter, or launching another tender concerning the same work before the first one is completed, would lead to issues such as the use of excessive funding for the work and exceeding prevailing market prices; therefore, such actions are recorded as public loss, and municipalities cannot do this. The design certification works were completed in 04/2022, and the 4+4 engines were commissioned in 2021. Due to the above-mentioned reasons preventing the change of the service scope, they could not be included during this process. Between 04/2022 and 10/2022, which was the end of the one-year period, it was not possible to complete the work before Gold Standard. For the design change, a service procurement tender was again launched under the same law, and since the PP is a public entity, the procedures related to these processes advance in accordance with the law and take a certain amount of time. For this reason, the completion of the tender, the procurement of the service, and the commencement of the work for the design change could only take place in 09/2022. 9) The validated PDD clearly describes the project as 53.420 MWm/51.972 MWe. The license of the project the validated PDD at Design Certification was also for this capacity and no amendments have been made. Therefore this is actually project design and not capacity addition. Therefore a design change is actually not relevant. The only issue needs to be addressed is the additionality with the full capacity.
Proposed resolution	Taking into account the above described project history, situation and reasoning we request that; 1) FAR#4 to be amended or removed.

	2) Permission to proceed with the already started Performance Review and Design Certification Renewal without the effects of the capacity increases as we desperately need carbon income as soon as possible. 3) Permission to amend the 1 year rule for the rejected design change due to the reasons stated above so that we can submit a new design change request with all implemented capacity in the future. Our request here is that, if this is granted, we wish Request number 2 above first so that we can generate credits as soon as possible without having to wait for another design change process. An alternative for this request is, since the project is already validated with the full capacity design and the only missing aspect is the additionality and ERs of the whole capacity. To treat this as not a design change of the project (Since the design of the project is already at full capacity at validation) but to treat it as a design change of the PDD where we can make the difference in PDD in full additionality demonstration and proper ER estimation which will not be related to the 1 year rule since the project is already registered as 53.420 MWm/51.972 MWe therefore no physical increase date would apply. 4) If Request number 3 above is denied, we request permission to be able to apply for Design Change for the new upcoming increases in capacity to the project excluding the 8 units rejected in the previous Design Change, provided we apply in time. 5) We propose that if needed to grant any of the requests above, even if not increasing the capacity for ER claims, we volunteer to demonstrate additionality of the full capacity of the project in any of the on going processes (Performance Review, Design Certification Renewal).
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 *(if yes, fill the table below)* Annual emission reduction/removal before applying deviation | Annual emission reduction/ removal after applying deviation *XYZ* tCO_2e | *XYZ* tCO_2e ☐ any other matrix, please specify…

Summary of the impact	In summary this requests outcome will directly affect continuation of the project since Performance Reviews and Design Certification Renewals are dependent on it.
Insert text here	

6.3 | VVB information

Is a VVB opinion on the deviation request required? *VVB opinion shall be included, where required by the requirements under [Deviations Request Requirements and Procedures] or request is submitted by the VVB.*	Yes ☐ No ☒ *If answer is yes, fill the information in section 6.4 below.*

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.

Document 2.

Document n.

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