

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **14.1.2021**

Version **4.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 06/12/2021

1.2 | Decision

The applied deviation request is **not approved**. The Gold Standard requirements are that the projects that were under the listing or validation process at the time of launch of GS4GG (01/07/2017) can request for registration/design review with the applied version of the standard before 23/11/2021. The project developer failed to meet this deadline. The GS Secretariat and TAC do not consider reasons provided by the PD sufficient justification for granting an extension to the submission deadline.

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_207	
Date of decision	06/12/2021	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	04/10/2011	
Project/PoA/VPA	Project	ID – GS1056
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	200 MW Istanbul WPP	
Location of project/PoA/VPA	Host country(ies)	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale - Turkey <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://impact.sustain-cert.com/project_developer/projects/45	
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 for Extension of completion of Validation	
Specify applicable rule/requirements/methodology and version number	TRANSITION REQUIREMENTS 2.1.4 and 3.1.12	
Specify the monitoring period for which the request is valid (if applicable)	Start date	End date
Submitted by	Contact person name:	
	Email ID:kemal@gte.com.tr	
	Organisation: GTE KARBON	
	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: -. Auditor name:-	

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):

LSC for the proposed project has been organized on 23/11/2012 and submitted on 18/12/2021. First feedback has been received on 29/10/2013 from GS.

At time of LSC meeting, Draft EIA had been submitted to Ministry of Environment for final approval and approval was expected. However, final approval of EIA has been completed in 06/2015 whereas generation license could be issued on September 2020.

Meantime, project design and boundaries, turbine locations, capacity etc. has changed upon comments from public agencies during EIA and licensing process. Project site has been reduced to 28 % of initially planned area and further reduction in land use has been achieved during micro siting and final layout studies. Thus, further to reduction to 28%, around 25-30 of land allocated to the project has not been used.

Due to design changes, EIA approval and generation license, grid connection point, GS certification process could not be continued since all project details (location, capacity, turbine type, financial information etc.) was subject to change during this period.

Turbine agreement had been signed for five turbines in June 2019 with assumption of approval of generation license and amended in November 2020 for 39 turbines. Project installation is still going on and by 12/11/2011, commissioning of 10 turbines have been approved and total installed capacity has reached 109MWe. Installation is expected to be completed in 2022 depending logistics, turbine supply and weather conditions.

On 27/04/2020, we have requested GS opinion about project status and we have been requested to respond first round review of LSC report. Meantime shareholders of company has changed on 02/05/2021 (see generation license page 4, article 3) and contract between GTE and project owner has been renewed.

As per the final layout, project boundary has been significantly reduced due to use of higher capacity turbines which also enables the project to exclude turbines in wildlife area and use much less land. Project owner has also initiated ESIA studies and continuous environmental monitoring procedures.

Due to delays in EIA and generation license and other permits, project could not be initiated until end of 2020 and installation is still going on. Project owner and GTE has continuously followed the progress to continue certification process.

Since it is not possible to calculate emission reductions, IRR or specify turbine coordinates, type etc. responses to first round review could not be initiated earlier. From the timeline, continuous and real action can be seen clearly. Timeline is in compliance with GS requirements.

As per the rules of GS4GG to finalize validations before 23/11/2017, project owner and developer request exemption from the rule for finalizing validation by 23/11/2021 or additional time for finalizing the validation until 01/10/2022.

Milestones are given below;

- 23/11/2012- LSC Meeting
- 18/12/2012- Submission of LSC to GS
- 29/10/2013- First round response from GS
- 05/09/2014-Amendment of Protocol btw GTE and project owner for continuation of certification process (see screenshot)
- 30/06/2015-EIA Approval
- 12/19/2016-11/19/2022- Emails with project owner about status of the project
- 27/04/2021-Emails with GS for continuation of GS review round
- 02/06/2020- Permission obtained from DG Nature Protection
- 01/06/2020-Turbine agreement (5 turbines)

- 20/09/2020- Turbine agreement (39 turbines)
- 09/10/2020- Permit from DG Forestry for land allocation/lease
- 25/12/2020- Commissioning of first turbine
- 02/05/2021- Change of ownership of the company
- 04/06/2021- Amendment protocol btw GTE and new project owner for GS
- 12/11/2021- Commissioning of 10 turbines
- 18/11/2021-LSC review response by GTE

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

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):

Although the certification has been initiated in 2012, due to delays in permissions, project could not be commissioned fully so far (by November 2021).

Due to delays in EIA, generation license and other permits and also changes in project (project site/size, turbine type, number ,capacity, location, generation, costs etc), responses to GS could not be submitted and certification process could not be continued.

Although the project was initially planned to be commissioned in 2013, due to the reasons explained in section 3.1.1, partial provisional acceptance of the project could be made on 12/11/2021 whereas full commissioning is expected in 2022.

Project validation and calculations could not be initiated until final plant layout (type and capacity of turbines etc) is decided. Generation license has been issued in end of 2020 and amended around 8 times due to change in turbine types, grid connection point, license period, partners (see Annex I generation license).

Project is large scale and carbon revenues are critical for the project activity. Due to ongoing uncertainties and delays, though the continuous and real action is shown, GS certification could not be initiated. We request request exemption or additional time to finalize registration process.

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

NA

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):

Deviation will not impact safeguarding or SDG assessment. Project owner has implemented several other studies as past of ESIA studies and working on a stakeholder involvement plan for the project activity. All environmental ,social impacts are assessed in detail and relevant measures are being defined.

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

NA

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.)*

- **Annexes**

- **Generation License (to see amendments in project design and partnership structure)**
- **Provisional Acceptance Cover Page**
- **EIA Approval**
- **Other Supporting Documents (emails, screenshots etc)**