

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_209	
Date of decision	06/12/2021	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	23/11/2021	
Project/PoA/VPA	Project	ID - GS1369
	PoA	ID - GSXXXX
	☐ VPA	ID – GSXXXX
Project/PoA/VPA title	Marmara 11.5 MW Wind Power Project, Turkey	
Location of project/PoA/VPA	Turkey	
Scale of the project/PoA/VPA	☐ Microscale ☐ Small scale	
	Large scale	
Gold Standard Impact	https://registry.goldstandard.org/projects/details/2	
Registry link of the	<u>24</u>	
project/PoA/VPA	∏ New	
Status of the project/PoA/VPA	☐ New	
	☐ Certified design	
	☐ Certified proj	
Title/subject of deviation	Registration Deadline Exemption	
Specify applicable	AMS-I.D Version 18.0	
rule/requirements/methodolo		
gy and version number		
Specify the monitoring period	-	
for which the request is valid		
(if applicable)	Contact person name:	
Submitted by	Contact person name: Email ID: Organisation: Babadağ Elektrik Uretim San. Ve Tic. A.Ş. Project participant: Yes NO	
V 1: 1 1: 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
Validation and Verification body (VVB opinion shall be	Yes NO	
included, where required by	If yes;	
the applicable	VVB name:	
rules/requirements or request	V V D Harrier	
is submitted by the VVB).	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 <u>Deviation Approval Procedure/Design Change Requirements</u>.

3.1.1 | Deviation detail (to be completed by Project developer):

Our Project, GS1369 Marmara 11.5 MW Wind Power Project has been listed on the Gold Standard registry in 2014. However, the location of the project has been changed to Erdek, Balıkesir due to not being able to get permission from the Security Board of Marmara Island and as a result, the project has not been able to start electricity generation. Due to this reason, in order to commence action in respect to the project (such as the preparations of PDD during the validation stage), waiting for the finalisation of location finalisation was necessary. Marmara 11.5 MW WPP is small scale project which has 9.6 MWe installed capacity and after the problems related to the location finalisation were resolved, the project was commissioned on 10/12/2020. That is, the date in which the project started generating electricity was 10/12/2020. All things considered and upon location finalisation, the PO anticipates the project to proceed in an orderly fashion. However, the document submission deadline specified in the GS4GG TRANSITION REQUIREMENTS document published by Gold Standard in 16/08/2021 (version 2.0) puts a strain on the project owner because there are currently only two active VVBs (ReCarbon and RINA) with offices located in Turkey and both of these VVBs have insufficient amounts of local experts running voluntary projects. Due to the pandemic, they could not increase their capacity and presently, they have way too many projects they need to provide services for. Due to everything mentioned above, offers were requested from VVBs located outside of Turkey, however in consequence of similar work densities, they have also fallen behind with their service proposals and the start of the validation process of the project owner has taken up too much time.

Additionally, with this deviation request form, we would like to indicate that the VER credits prices were quite low during those times in which this project should have held its registration process. Unfortunately, considering the cost of DOE and GS services for a registration process, it was not profitable for POs to issue the associated VER credits.

TEMPLATE - DEVIATION REQUEST FORM V4.0

So, this was why the PO of Marmara 11.5 MW Wind Power Project did not initiate a registration process in those times.

We kindly request, with this deviation request form, an exemption from the articles 3.1.12(a) and 3.1.12(b) of the Gold Standard TRANSITION REQUIREMENTS (publication date: 16/08/2021, version:2.0) document. This way, the project validation process will continue without being liable to any sort of time limitation and the documentary evidences that can be found in the aforementioned Gold Standard document.

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

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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):

According to the rules of GS, such Projects/PoAs must have engaged a VVB and shall submit the request for registration/design review before 23/11/2021. If our request is accepted, the project will complete its validation process without being liable to the 23/11/2021 deadline and without submitting the documentary evidences that are requested by GS and get successfully registered to Gold Standard.

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

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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):

In the case of the project being liable to the articles 3.1.12(a) and 3.1.12(b) of the Gold Standard TRANSITION REQUIREMENTS (publication date: 16/08/2021) document, it will lose its right to get registered to Gold Standard due to not being able to complete all the documents required until the specified date (23/11/2021) by the reason of VVBs' work densities despite having started electricity generation quite recently and having completed all the necessary procedures in terms of carbon certification.

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

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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.)