

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 07/11/2022

1.2 | Decision

Deviation request 1:

The applied deviation request is approved. The Project Developer may continue with the design review of the project.

Deviation request 2:

The applied deviation request is partially approved. The project can undergo design certification renewal, with the crediting period starting immediately after the end date of the previous CP. However, no credits (and SDG Impacts) can be claimed for the period of delay.

1.3 | Is this decision applicable to other project activities under similar circumstances?

No

1.3.1 | To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation (Submit deviation request form in Microsoft Word format)

Please see Section 2 below.

2| Background information

Deviation Reference Number	DEV_319	
Date of decision	07/11/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	07/10/2022	
Project/PoA/VPA	Project	ID – GS1192
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	10 MW Umurlar Wind Power Project	
Date of listing	2015	
GS Standard version applicable	GS v2.2	
Date of transition to GS4GG (if applicable)		
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	20/07/2015 (Project Validation Date by DOE)	
Location of project/PoA/VPA	Turkey	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" 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/119	
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	Deviation Request for 1. Project Registration and seeking labelling under GS4GG, successive verification of the 1 st CP in line with GS Clarification, which stipulates "Projects that were under the listing or validation process at time of launch of GS4GG (01/07/2017) can request for	

	registration/design review with applied version of the standard before 23/11/2021" 2. Revalidation for the start of the 2nd CP
Specify applicable rule/requirements/methodology , with exact paragraph reference and version number	AMS-I.D. "Grid-connected electricity generation (Version 17)
Specify the monitoring period for which the request is valid (if applicable)	Start date 30/09/2014 End date 29/09/2021
Submitted by	Contact person name: Gediz KAYA
	Email ID: gkaya@gaiacclimate.com
	Organisation: GAIA Climate
	Project participant: Yes <input type="checkbox"/> No <input checked="" 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: VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

3| Deviation detail

3.1 | Description of the deviation:

The project has been listed under Gold Standard in 2015. 1st crediting period of the project is 30/09/2014- 29/09/2021 as per the validation report completed by RINA.

Pursuant to GS Clarification published on 05/05/2022, projects that had "Listed" status under a previous version of the Standard may submit the Project for design review no later than 23/11/2022, provided that required conditions are met.

In addition and according to the GS v2.2 requirement, Revalidation process shall begin (defined by the submission of a Renewal opinion by a VVB for Design Review to Gold Standard) no later than the last date of current certification cycle. Note that review of the Design Certification Renewal may complete after the last date of current

crediting period. The design certification renewal could not be performed by 29/09/2021. Hence, there is a delay period of thirteen months to start revalidation.

Therefore, we kindly request a deviation for (1) Project registration and successive verification of the 1st CP and (2) revalidation to start 2nd CP.

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

Umurlar 10 MW Wind-farm Project (hereafter referred as "the proposed project") is a new built wind-farm project, located in Dursunbey County of Balıkesir Province, Turkey owned by ELFA ELEKTRİK ÜRETİM A.Ş.

The installed capacity of the project was 10 MW consisting of 5 turbines. The Project commenced operation on 30/09/2014.

The project has been validated by RINA on 20/07/2015 and has become "Listed" under Gold Standard in 2015. The 1st CP is 30/09/2014-29/09/2021. Please note that, without the knowledge of the project owner, the GS registration was not requested by the previous carbon consultant even though the Project was validated.

The first Deviation Request Form for the 10 MW Umurlar Wind Power Project was submitted on 22/11/2021 and the decision was made on 17/12/2021. The Decision was as follows:

"The deviation request is not approved since there were no real actions from the Project Developer to secure carbon finance since the project listing. The project developer must comply with paras 2.1.4 and 3.1.12 of the Transition Requirements."

We strongly argue that the decision has to be reconsidered by Gold Standard. The project owner hired a consultant named Borga Carbon for carbon asset development services and paid the consultant also for the validation service to be paid to RINA, which is the DOE of the project. Then, according to mail correspondence that can be provided as proof if necessary, the validation report was completed by the DOE but the DOE did not release the report hence the DOE did not receive any payment. The consultant abandoned the project along with many other carbon credit projects in the market and disappeared without any explanation. Later, the DOE sent a legal notice

for the payment and the PO paid for the second time, to be able to receive the report. The DOE reported that the validation report did not exist in their systems anymore because of a cyber attack. Please note that the DOE had conducted a reckless process by first sending the report to the consultant only in 2015, the consultant that abused that mistake and then by losing the validation report after the PO proved the payment for validation services.

Recently and luckily after a thorough search and continuous request from the Project Owner, DOE found the final validation report and all supporting documents. Therefore, the PO did their best to register the project by trying to access the final validation report.

Hence we argue that there is clear action by the PO to complete the registration of the project. Gaia Climate assumes a constructive role for such resolution not only because of a commercial stake but to preserve the reputation of the voluntary carbon markets. The project owner has been the victim here and treated by both the DOE and the consultant unjustly. We believe the Gold Standard could collaborate with us to bring integrity to this case, which is well-deserved by the project owner.

As a result, we kindly request approval of our deviation request for Project registration having labeled under GS4GG, continue with verification of the 1st CP and revalidation.

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

N/A

3.2 | Assessment of the deviation:

3.2.1 | Deviation assessment (to be completed by Project developer):

The project is still additional in Turkey where the project owner try to maintain financial feasibility in a "high interest rate and daily currency crash" investment environment. Also, the project contributes significantly to the region's sustainable development in the following ways:

- Reduction of the greenhouse gas emissions in Turkey by replacing electricity otherwise generated by the Turkish grid, which has a large share of fossil fuel power generation.
- Creation of local employment both during the construction and operational phase. At the moment the unemployment level in Turkey is 11.4%¹. The Project will mainly have a positive impact on the local area.
- Creation of new job opportunities for the local community and support to the regional economy through the employment of different kind of service and material supply (civil and electrical works, operation and maintenance activities, security).
- Technology and know-how transfer as the employees are trained on maintenance, safety, and operational issues.
- Contribution to the reduction of pollutants such as sulfur dioxide, nitrogen oxides and particles resulting from the electricity generation using fossil fuels in Turkey.
- Reduction of Turkish dependency on electricity imports.
- Diversifying the energy generation mix which is currently dependent on natural gas.

It has been justified that the project activity is contributing to sustainable development and result in real, measurable benefits.

Last of all, it is strongly believed that this Project deserves to benefit from VER issuances. We strongly believe that the Project could not been registered because of multiple reasons none of which were caused by the Project Owner; therefore the Project should be allowed to be placed back to GS Project cycle, which is very well-deserved.

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

N/A

3.3 | Impact of the deviation:

3.3.1 | Impact assessment (to be completed by Project developer):

¹ <https://data.tuik.gov.tr/Bulten/Index?p=Isgucu-Istatistikleri-Ocak-2022-45644>

The project would highly benefit from carbon credits, as the additionality is high due to technical difficulties that have required continuous maintenance of the power plant. In addition to the must to keep the on-going maintenance of the power plant, the recent economic and financial stress in Turkey and the global crisis because of the Ukrainian War, make it even harder for the investors to access finance for further improvements. Sale of carbon credits would therefore be a great contribution to the Project revenue.

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

N/A

3.4 | Documents:

Gold Standard Final Validation Report "10 MW Umurlar Wind Power Project, Turkey" in Turkey prepared by RINA, date of approval 20/07/2015

All validation documents relevant to this final validation report will be uploaded to the GS Project Account.

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 - any previous deviations/design changes approved Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption

