

**TEMPLATE**

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2021**

Version **5.0**

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## **A. To be completed by Gold Standard**

### **1 | Decision**

#### **1.1 | Date – 25/05/2023**

#### **1.2 | Decision**

The deviation request is not approved.

Design Certification Renewal will follow its process to ensure that the Renewable of Crediting Period complies with all the applicable requirements.

The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

The verifying VVB shall, confirm the date of site visit in the verification report and verify that the MP duration is not more than three years from this date and through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provide its opinion in the Verification Report.

SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

**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**

**2| Background information**

Deviation Reference Number	DEV_423	
Date of decision	25/05/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	17/03/2023	
Project/PoA/VPA	Project	ID – GS388
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Mazi-3 30 MW Wind Power Plant Project	
Date of listing	09/07/2008	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	Transitioned to GS4GG with CP renewal	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	N/A	
Location of project/PoA/VPA	Turkey	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://registry.goldstandard.org/projects/details/681">https://registry.goldstandard.org/projects/details/681</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project	
Title/subject of deviation	Streamlined Crediting Period Renewal Process for Mazi-3 30 MW Wind Power Plant Project	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	<ul style="list-style-type: none"> <li>- Principles &amp; Requirements (Version 1.2), Section 5, Para. 5.1.1., 5.1.45, 5.1.46, 5.1.47.</li> <li>- Validation and Verification Standard (Version 1.0), Section 10</li> </ul>	

Specify the monitoring period for which the request is valid (if applicable)	Start date: 09/09/2023      End date: 08/09/2030  (Dates below are for the crediting period subject to this deviation request)
Submitted by	Contact person name: Inci Hazal Ozcan
	Email ID: incihazal.ozcan@lifeenerji.com
	Organisation: Life İklim ve Enerji Ltd. Şti.
	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 type="checkbox"/> No <input checked="" type="checkbox"/>

### 3 | Deviation detail

#### 3.1 | Description of the deviation:

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

The “Mazi-3 30 MW Wind Power Plant Project” (hereon referred to as the “project”) is requesting a deviation from the standard crediting period renewal procedure. As the Secretariat may be aware, our project has regrettably experienced a prolonged crediting period renewal process, which regrettably culminated in a delay in following procedures as well. Given the impending renewal deadline in a mere six months, we would like to propose a more expeditious and simplified process to guarantee the efficient renewal of our crediting period. We recognize the necessity of the standard renewal process to validate and uphold the project's emission reduction efforts; however, we have experienced considerable delay during our most recent renewal for the second crediting period which covered a period between 09/09/2016 and 08/09/2023. As per Principles and Requirements (v 1.2), para. Section 5, Subsection (e), Para 5.1.4.5 “To maintain Gold Standard Certified Project status beyond five years, a Project must undergo Design Certification Renewal. This 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.” Due to the short period of time until the submission of

documents for the next renewal – until 08/09/2023), we are concerned that the project will go through the identical process with the same supporting documents, which can be deemed as repetitive. Consequently, we respectfully submit the following proposal for deviations from the standard renewal process, focusing on the role of the VVB and the optimization of the PDD and Validation Report.

In this context, we request a streamlined for the renewal process, focusing on essential updates and key performance indicators (such as emission reductions and SDG impacts) rather than a comprehensive review of the project – which already took place less than a year ago for the second crediting period renewal. We humbly request that the VVB produce a concise validation report in line with the PDD. Both the PDD and the Validation Report would follow the standard template, prepared by the GS4GG, but the generic parts that were already subjected to meticulous validation by the VVB and the standard, would be accepted as approved priorly. For Ongoing Financial Need, for instance, the situation will remain the same in the course of the next 9 months, thus rendering the requirement to reaffirm financial need. Further, the baseline scenario – which refers to the current situation of the electricity mix in the host country – would not differ dramatically from what it was about a year ago. We also propose to keep this section the same. In essence, we would like to change the parts related to key performance indicators and revised methodological requirements, such as the updated version of applied ACM0002 methodology, for the third crediting period.

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

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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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):

To demonstrate that the proposed deviation complies with the relevant paragraphs from the GS4GG Principles and Requirements document (5.1.45 - 5.1.47), we provide the following explanations:

*5.1.45* - Our proposed deviation aims to initiate the Design Certification Renewal process within the stipulated timeframe by submitting a Renewal opinion by a VVB for Design Review to Gold Standard no later than the last date of the current certification cycle.

*5.1.46* - The proposed deviation seeks to prevent any delay in the completion of re-validation beyond the last date of the current certification cycle, thereby avoiding the potential reduction of Certified Products or Impact Statements issuance during the following certification cycle. Our proposed solution aims to reduce the likelihood of delays and ensure timely renewals.

*5.1.47* - Our deviation proposal addresses the scope of assessment required for Design Certification Renewal by only changing key performance indicators and methodology-specific requirements.

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

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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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):

The proposed deviation is intended to expedite the renewal process without altering the project's fundamental design or structure. By focusing on essential updates, pivotal

performance indicators, and pre-assessment of key areas, the project can maintain its effectiveness. While the proposed deviation maintains compliance with the GS4GG safeguarding principles, and the streamlined approach will enable the project to proactively identify and address any impacts that differs from the ones examined during the second crediting period renewal procedures. The deviation will not compromise the project's alignment with the SDGs. It will not affect the project's ability to achieve its emission reduction targets. By streamlining the renewal process and minimizing delays, the project can maintain its focus on generating clean, renewable energy, ultimately contributing to reduced greenhouse gas emissions. The deviation does not propose changes to applied methodology or methodological requirements.

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

*\*Guidance\* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

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### 3.4 | Documents:

N/A

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> </ul> Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption