

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 03/07/2023

1.2 | Decision

The deviation request is not approved. The explanation and justification provided by the project developer were not found enough for this deviation to be granted.

The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the PDD.

The Validating/verifying VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above-mentioned conditions and provides its opinion in the Validation 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 (Submit deviation request form in Microsoft Word format)

2| Background information

Deviation Reference Number	DEV_447	
Date of decision	03/07/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	11/05/2023	
Project/PoA/VPA	Project	ID – GS1372
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	KIYIKOY WPP	
Date of listing	27/03/2014	
GS Standard version applicable	GS Version 2.2 VER	
Date of transition to GS4GG (if applicable)	-	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	-	
Date of design certification/inclusion (if applicable)	-	
Location of project/PoA/VPA	Turkey, Tekirdag	
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	https://registry.goldstandard.org/projects/details/227	
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	Exemption from Article 3.1.12(b) of the Gold Standard TRANSITION REQUIREMENTS (version 2.0) document	
Specify applicable rule/requirements/methodolog	ACM0002 Version 20	

y, with exact paragraph reference and version number	
Specify the monitoring period for which the request is valid (if applicable)	Start date End date
Submitted by	Contact person name: Nilsun Akpınar Email ID: nilsun.akpinar@makienerji.com.tr
	Organisation: Beşiktepe Enerji Üretim ve Ticaret A.Ş.
	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: 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:

**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):

This deviation request is submitted to the Gold Standard regarding the exemption needed for Kiyikoy WPP Project (hereon referred to as “the project”) from article 3.1.12(b) of the Gold Standard TRANSITION REQUIREMENTS (publication date: 16/08/2021, version 2.0) document. The project was listed under Gold Standard with ID 1372, as a large-scale wind power plant with 44 MWe installed capacity on 27/03/2014.

As per paragraph 3.1.12 of the Transition Requirements (version 2.0) document, “Projects/PoAs that are under listing or validation process at the time of launch of GS4GG (01/07/2017) shall follow, as applicable, the requirements, procedures, and

timeframes listed below to achieve Design Certification under previous versions of the Standard:

- a) Such Projects/PoAs must have engaged a VVB and shall submit the request for registration/design review before 23/11/2021. Such projects/PoAs shall transition to GS4GG at the time of first verification after 23/11/2021, and
- b) For such projects/PoAs,
 - The Project Developer (PD)/Coordinating/Managing Entity (CME) shall demonstrate that "continuing and real actions were performed to secure Design Certification."

The applicable GS standard version is GS Version 2.2 VER, and the project was listed on 27/03/2014. Therefore, we would like to indicate that the requirements given in the 3.1.12 paragraph of the Transition Requirements introduced on 16/08/2021 mentioned new retroactive rules for all existing GS projects at that time. However, we would like to bring to your attention an issue regarding certain projects with special status that we believe may be impacted negatively by the current requirements, which was not fair, especially for the ones whose ownerships changed well after the GS application of the project. We understand that the standard requires all projects to meet certain criteria and comply with specific requirements. However, this project has undergone a change in ownership, which we believe may present challenges in meeting these current requirements. We understand that the standard requires certain actions and correspondence to be completed within specific timelines to ensure that the project meets the necessary criteria for carbon certification. However, no previous communications done by the previous owner can be accessed by the new PP. We believe that it would be unfair to penalize the project for a situation that is beyond the current Project Proponent's control and may impact the project's ability to comply with the current requirements.

The project had a change in ownership on **02/03/2020** as can be seen in the evidence document. Then, Carbon Consultancy Agreement has been signed on **17/08/2021** with Life İklim ve Enerji. The new Project Proponent has taken swift action to address any issues or challenges that may impact the project's compliance with the current requirements. We believe that this proactive approach demonstrates a strong commitment to the reduction of carbon emissions and should be recognized by GS.

To summarize, the new Project Proponent is facing a challenging situation due to several factors. Firstly, the project changed ownership on 02/03/2020, and the new Project

Proponent has not been able to access any previous communications related to the project. This lack of information has made it difficult for the new Project Proponent to fully understand the project's history and comply with the current rules. Secondly, new retroactive rules were introduced on 16/08/2021 that require all existing GS projects to comply with the requirements given in the 3.1.12 paragraph of the Transition Requirements. This has added an additional burden for the new Project Proponent to ensure compliance with the new rules.

We kindly request, with this deviation request form, an exemption from article 3.1.12(b) of the Gold Standard TRANSITION REQUIREMENTS (publication date: 16/08/2021, version 2.0) document to acknowledge the efforts of the new PP to maintain the project's carbon rights. This way, the project validation process will continue without being liable for any sort of documentary evidence that can be found in the aforementioned Gold Standard document.

We kindly request your understanding and assistance in this regard.

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):

If our request is accepted, the project will complete its validation process without submitting the documentary evidence that is requested by GS and get successfully registered to Gold Standard. So, we kindly request, with this deviation request form, an exemption from article 3.1.12(b) of the Gold Standard TRANSITION REQUIREMENTS (publication date: 16/08/2021) document.

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):

In the case of the project being liable to article 3.1.12(b) of the Gold Standard TRANSITION REQUIREMENTS (publication date: 16/08/2021) document, it may lose its right to get registered to Gold Standard while it is in the final stage of the validation process.

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:

**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.)*

Version number	Release date	Description
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5	11.04.2022	<p>Additional information added:</p> <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 <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption