



DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – dd/mm/yyyy

29/09/2024

1.2 | Decision

The Deviation Request is Not Approved.

1. The project might have the COVID-19 restrictions earlier; however, they are relevant for all the projects globally.
2. The project site is in Canakkale province, which is not falling within the emergency provinces declared by the Turkish Government. Moreover, the validation has been done remotely by the VVB on 23/07/2020, which is 3 years before the emergency.
3. The documents have been already submitted to GS for design review prior to the declaration of emergency (as per the PD's email communication on 10/11/2022).
4. Further, there were no e-mail communication evidences from the PD to SC on the circumstances involving delays, like the COVID and Emergency declaration. Also, the email communication sent on 23/06/2023 by the PD is to enquire about listing date, and also the e-mail dated 10/11/2022 to enquire about the validation progress as they have submitted all the documents to GS (after listing). It is not sure when the PD has responded to SC on the feedback review points raised.

5. The design review has been approved on 04/03/2024. There is no evidence to show that VVB has been contracted to perform verification before or after March 2024 to demonstrate that continuous actions were taken by the PD for the issuance of GS VERs, and the monitoring activity has been completed.

In line with p.5.1.29 of P&R: Verification must occur at least once during the five-year Certification cycle with the first Verification completed within two years of project Implementation Date or Design Certification, whichever is later. The design certification date is 10/08/2022. In light of the above, PD cannot claim the VERs from the start of project generation date.

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_729	
Date of decision	29/09/2024	
Precedent (YES/NO)	NO	
Precedent details	NA	
Date of submission	31/05/2024	
Project/PoA/VPA	Project	ID- GS7741
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	GAZI-9 WPP	
Date of listing	2020	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	N.a	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N.a	
Date of design certification/inclusion (if applicable)	04/03/2024	
Location of project/PoA/VPA	Çanakkale province of 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	https://registry.goldstandard.org/projects/details/2586	
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	Approval Request for issuance of GSVERs from the starting of the project’s generation because of Earthquake and COVID issues	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	ACM0002, Version 20.0	

Specify the monitoring period for which the request is valid (if applicable)	The project has completed the design review on 04/03/2024. And Sanko company is requested approval from GS-SC for issuance GSVERs between 22/10/2020-31/05/2024.
Submitted by	Contact person name: Muhsin Dervişoğlu Email ID: muhsin.dervisogullari@sankoenerji.com.tr
	Organisation: Sanko Enerji Sanayi 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 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 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):

Sanko Enerji Sanayi ve Ticaret A.Ş. has installed 67.2 MWm/51 MWe Gazi-9 wind power plant in capacity in borders of Çanakkale province in Turkey. The project has 14 turbines which each having an output of 4.8 MWm. The total electricity production of the project is estimated as 178,500 MWh/year.

The project owner has faced significant challenges in completing the validation of the project since 2020, with delays due to the COVID-19 pandemic and natural disasters such as earthquakes in Turkey. Sanko Enerji's headquarters, where all its operations are conducted, is located in Gaziantep. On February 6, 2023, an earthquake occurred, affecting ten provinces including Gaziantep. More than 50,000 people lost their lives, almost 100,000 people were injured, 1,000,000 people had their lives changed in these

provinces. A State of Emergency was declared for these provinces (the relevant official decision is attached in Turkish), and many institutions, including the Energy Market Regulatory Authority (the authority that grants production licenses and makes all the decisions, the relevant official decision is attached in Turkish), extended the deadlines for various tasks. Consequently, this also affected the validation process in the carbon business, and the tasks could not be completed. Financially, we need the carbon revenues, so we seek your approval to issue all of our GSVER credits once our plant starts electricity production. Despite these hardships, the design review was successfully completed on 04/03/2024. The Project Owner has been struggling to complete the registration (Design Certification) for many years.

After extensive and meticulous efforts on the project, Sanko Energy requests the issuance of GSVERs from the starting credit date. (Between 22/10/2020 and 31/05/2024)

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.*

Firstly, the COVID-19 outbreak has caused significant slow-down in many business operations in Türkiye due to the significant adverse impacts of the outbreak and the restrictive precaution decisions has been taken by the government as checked and confirmed through the following links (https://tr.wikipedia.org/wiki/T%C3%BCrkiye%27de_COVID-19_pandemisi_zaman_%C3%A7izelgesi and (<https://www.icisleri.gov.tr/arama/ara/soka%C4%9Fa%20%C3%A7%C4%B1kma>) and through the significant local knowledge of the validation team (Team Leader being the local). Similarly, the massive earthquake affecting almost 11 cities in Türkiye including Gaziantep where the headquarters of Sanko Holding (Sanko Enerji Sanayi ve Ticaret A.Ş., as the PP, belongs to and operate under the same) is located as checked and confirmed again through the following link (<https://sanko.com.tr/en/>) and through the significant local knowledge of the validation team (Team Leader being the local) and the state of emergency decision was taken by the government on 08/02/2023 (<https://www.resmigazete.gov.tr/eskiler/2023/02/20230208-1.pdf> and <https://www.resmigazete.gov.tr/eskiler/2023/02/20230218-5.pdf>) and the same also affected negatively especially the GS design review stage and respond time. The validation service contract was signed with the PP on 07/04/2020 and the timeline of the project has already been checked and confirmed by the validation team during the validation process. Besides that, the email sent to Gold Standard by PP and dated as 23/06/2023 asking about the actual listing date of the project and the email sent to the consultant and dated as 10/11/2022 about the status of this project submitted to Gold Standard at that time. That means, it can be concluded that PP has been following up the status of the project's progress and continued actions have been taken by PP. Finally, there had been quite busy period in both VVB and PP side due to the high workload and negative impacts of staff changes in the consultant side. These have also significant negative impact on GS design review stage, the associated respond time and the registration process of the project. Therefore, considering all above, the deviation request by PP is found reasonable and logical in VVB side and any adverse impact has been foreseen by the VVB due to the same.

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):

As you can see below, design certification process has taken very long because of so many reasons such as COVID-19 pandemic and natural disasters such as earthquakes in Turkey. And we are seeking a clarification that we can monitor the parameters for 22/10/2020-31/05/2024.

Please find below the milestones of the project:

Milestone	Date
Feasibility Report	13/11/2018
Agreement between Carbon Consultant and Sanko Enerji Ticaret ve Sanayi A.Ş	15/01/2019
EIA Positive Decision	09/04/2019
Turbine Agreement	02/08/2019
Generation License of 14 turbines	26/09/2019
LSC Meeting	16/01/2020
Acceptance Certificate by Ministry of Energy and Natural Resources of T2	22/10/2020
Acceptance Certificate by Ministry of Energy and Natural Resources of T1	19/11/2020
Acceptance Certificate by Ministry of Energy and Natural Resources of T3 and T4	18/12/2020
Acceptance Certificate by Ministry of Energy and Natural Resources of T6 an T7	07/01/2021
Acceptance Certificate by Ministry of Energy and Natural Resources of T5 and T11	21/01/2021
Acceptance Certificate by Ministry of Energy and Natural Resources of T9 and T12	05/02/2021
Acceptance Certificate by Ministry of Energy and Natural Resources of T13 and T14	19/02/2021
Acceptance Certificate by Ministry of Energy and Natural Resources of T8	30/09/2021
Acceptance Certificate by Ministry of Energy and Natural Resources of T10	12/11/2021
GS Design Certification Approval	04/03/2024

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.*

Firstly, the COVID-19 outbreak has caused significant slow-down in many business operations in Türkiye due to the significant adverse impacts of the outbreak and the restrictive precaution decisions has been taken by the government as checked and confirmed through the following links (https://tr.wikipedia.org/wiki/T%C3%BCrkiye%27de_COVID-19_pandemisi_zaman_%C3%A7izelgesi and (<https://www.icisleri.gov.tr/arama/ara/soka%C4%9Fa%20%C3%A7%C4%B1kma>) and through the significant local knowledge of the validation team (Team Leader being the local). Similarly, the massive earthquake affecting almost 11 cities in Türkiye including Gaziantep where the headquarters of Sanko Holding (Sanko Enerji Sanayi ve Ticaret A.Ş., as the PP, belongs to and operate under the same) is located as checked and confirmed again through the following link (<https://sanko.com.tr/en/>) and through the significant local knowledge of the validation team (Team Leader being the local) and the state of emergency decision was taken by the government on 08/02/2023 (<https://www.resmigazete.gov.tr/eskiler/2023/02/20230208-1.pdf> and <https://www.resmigazete.gov.tr/eskiler/2023/02/20230218-5.pdf>) and the same also affected negatively especially the GS design review stage and respond time. The validation service contract was signed with the PP on 07/04/2020 and the timeline of the project has already been checked and confirmed by the validation team during the validation process. Besides that, the email sent to Gold Standard by PP and dated as 23/06/2023 asking about the actual listing date of the project and the email sent to the consultant and dated as 10/11/2022 about the status of this project submitted to Gold Standard at that time. That means, it can be concluded that PP has been following up the status of the project's progress and continued actions have been taken by PP. Finally, there had been quite busy period in both VVB and PP side due to the high workload and negative impacts of staff changes in the consultant side. These have also significant negative impact on GS design review stage, the associated respond time and the registration process of the project. Therefore, considering all above, the deviation request by PP is found reasonable and logical in VVB side and any adverse impact has been foreseen by the VVB due to the same.

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):

This project has been developed as a VER project accounting for GS financing and revenue from carbon credits which are essential for loan repayments as well as supporting the sustainable development parameters. During this time, the project owner has continued to monitor all parameters which were validated and approved during the design certification. To secure carbon finance, the Project Owner continued its monitoring activities internally in the same manner as the projects was being verified. So, we hope that you will approve our deviation request to issue of GSVERs from starting credit date of the project.

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.*

Firstly, the COVID-19 outbreak has caused significant slow-down in many business operations in Türkiye due to the significant adverse impacts of the outbreak and the restrictive precaution decisions has been taken by the government as checked and confirmed through the following links (https://tr.wikipedia.org/wiki/T%C3%BCrkiye%27de_COVID-19_pandemisi_zaman_%C3%A7izelgesi and (<https://www.icisleri.gov.tr/arama/ara/soka%C4%9Fa%20%C3%A7%C4%B1kma>) and through the significant local knowledge of the validation team (Team Leader being the local). Similarly, the massive earthquake affecting almost 11 cities in Türkiye including Gaziantep where the headquarters of Sanko Holding (Sanko Enerji Sanayi ve Ticaret A.Ş., as the PP, belongs to and operate under the same) is located as checked and confirmed again through the following link (<https://sanko.com.tr/en/>) and through the significant local knowledge of the validation team (Team Leader being the local) and the state of emergency decision was taken by the government on 08/02/2023 (<https://www.resmigazete.gov.tr/eskiler/2023/02/20230208-1.pdf> and <https://www.resmigazete.gov.tr/eskiler/2023/02/20230218-5.pdf>) and the same also affected negatively especially the GS design review stage and respond time. The validation service contract was signed with the PP on 07/04/2020 and the timeline of the project has already been checked and confirmed by the validation team during the validation process. Besides that, the email sent to Gold Standard by PP and dated as 23/06/2023 asking about the actual listing date of the project and the email sent to the consultant and dated as 10/11/2022 about the status of this project submitted to Gold Standard at that time. That means, it can be concluded that PP has been following up the status of the project's progress and continued actions have been taken by PP. Finally, there had been quite busy period in both VVB and PP side due to the high workload and negative impacts of staff changes in the consultant side. These have also significant negative impact on GS design review stage, the associated respond time and the registration process of the project. Therefore, considering all above, the deviation request by PP is found reasonable and logical in VVB side and any adverse impact has been foreseen by the VVB due to the same.

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
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