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for the Global Goals

TEMPLATE

KEY PROJECT INFORMATION & PROJECT DESIGN DOCUMENT (PDD)

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VERSION **v.1.5**

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KEY PROJECT INFORMATION

GS ID of Project	GS735
Title of Project	Aliağa Wind Farm
Time of First Submission Date	27/05/2011
Date of Design Certification	03/04/2012
Version number of the PDD	09
Completion date of version	16/12/2024
Project Developer	Bergama RES Enerji Üretim A.Ş.
Project Representative	Bergama RES Enerji Üretim A.Ş.
Project Participants and any communities involved	Bergama RES Enerji Üretim A.Ş.
Host Country (ies)	Turkey
Activity Requirements applied	<input type="checkbox"/> Community Service Activity <input checked="" type="checkbox"/> Renewable Energy <input type="checkbox"/> Land-Use and Forests Activity Requirements/Risks & Capacities <input type="checkbox"/> N/A
Scale of the project activity	<input type="checkbox"/> Micro scale <input type="checkbox"/> Small Scale <input checked="" type="checkbox"/> Large Scale
Other Requirements applied	N/A
Methodology (ies) applied and version number	01- ACM0002: Grid-connected electricity generation from renewable sources --- Version 21.0
Product Requirements applied	<input checked="" type="checkbox"/> GHG Emissions Reduction & Sequestration <input type="checkbox"/> Renewable Energy Label <input type="checkbox"/> N/A
Project Cycle:	<input checked="" type="checkbox"/> Regular <input type="checkbox"/> Retroactive

Table 1 – Estimated Sustainable Development Contributions

SUSTAINABLE DEVELOPMENT GOALS TARGETED	SDG IMPACT (DEFINED IN B.6)	ESTIMATED ANNUAL AVERAGE	UNITS OR PRODUCTS
SDG 13 Climate Action	Emission Reductions	187,114	VERs
SDG 7 Affordable and clean energy	MWh of renewable energy generated	294,900	MWh/yr
SDG 8 Decent work and economic growth	Number of employees and Training given	22 people	Number
		1	HSE Training/employee/yr

SECTION A. DESCRIPTION OF PROJECT

A.1 Purpose and general description of project

Bergama RES Enerji Üretim A.Ş., installed 36 wind turbines, each having a capacity of 2.5 MW with a total capacity of 90 MW (**Aliağa WFP**). EMRA granted Aliağa WFP with a Generation License on 17/07/2008. The partial commissioning was achieved on 09/04/2010 and the complete commissioning on 16/06/2010.¹ With a total capacity of 90 MW, the plant's estimated electricity generation is 294,900² MWh per year. The voltage is stepped up to 154 kV, and the power is fed to the grid through the Viking TM (Substation) of the Turkish Electricity Transmission Company (TEİAŞ). An estimated generation of 294.9 GWh per year by the efficient utilization of the available wind energy by project activity replaces the grid electricity, which comprises different fuel sources, mainly fossil fuels. EMRA revised the Generation License of the Project Activity on 13/03/2013 to have a total capacity of 120 MW. On 01/07/2016, two additional turbines, each having a capacity of 3.0 MW, started generating electricity and on 12/08/2016, six other additional turbines each having a capacity of 3.0 MW started generating electricity and lastly on 02/09/2016, two additional turbines, each having a capacity of 3.0 MW, so that the total capacity of the project reached 120 MW. There are currently 46 wind turbines operating in the project activity. As per the Generation License for the installed capacity of 120 MW, the Project Activity will produce 420,000

¹ See, 37.5 and 52.5 MW Provisional Acceptance Letter (total 90 MW)

² DEWI Micrositing Report 0719302A

MWh of electricity per year. However, since the Project did not undergo a design change procedure under GS, emission reduction claims will be conducted with the 90 MW registered capacity. As per the registered PDD for 90 MW registered capacity a 294,900 MWh electricity will be generated yearly. Considering this yearly generation amount stated in the license, the project activity will result in an annual emission reduction of 187,114 tons of CO₂e. Moreover, project activities will further disseminate wind energy and extension of national power generation.

Table 2 Project Implementation Schedule

Date (DD/MM/YYYY)	Activity
02/06/2008	Investment decision Date
17/07/2008	Generation License Date
08/10/2008	Signing of VERPA Agreement
07/11/2008	Local Stakeholder Meeting
07/04/2009	Revision of Generation License
02/2009 – 04/2009	Stakeholder Feedback Round
08/05/2009	Turbine Supply and Installation Agreement
20/05/2009	Agreement with the VVB
17/07/2009	Construction/ Recruitment Start Date
25/08/2009	Site Visit Conducted
03/09/2009	LSC Report Uploaded to GS Registry
15/10/2009	LSC Feedback report uploaded
09/04/2010	Start Date of First Crediting Period
09/04/2010	Partial Commissioning Date
16/06/2010	Full Commissioning Date
09/04/2010 – 31/12/2011	First Monitoring Period
18/16/2012	First Submission of First Monitoring Period
01/01/2012 – 30/06/2012	Second Monitoring Period
03/04/2012	Gold Standard Registration
01/07/2012 – 31/12/2012	Third Monitoring Period
13/03/2013	Revision of the Generation License for 120 MW
26/08/2013	Date of "EIA is not Required" Certificate

Date (DD/MM/YYYY)	Activity
01/07/2016	Operation Start date of two additional turbines
12/08/2016	Operation Start date of six additional turbines
02/09/2016	Operation Start date of two additional turbines
08/04/2017	End Date of the First Crediting Period
09/04/2017	Start Date of the Second Crediting Period
11/01/2022 – 11/03/2022	Stakeholder Feedback Round
18/07/2022	First Submission of Crediting Period Renewal
19/07/2022 – 30/06/2023	Fourth Monitoring Period
08/04/2024	End Date of the Second Crediting Period
09/04/2024	Start Date of the Third Crediting Period
08/04/2031	End Date of the Third Crediting Period

The Project Activity has undergone three verifications, as seen from the above table. However, between 01/01/2013 – 08/04/2017, no verification was conducted due to the fact that the VER credits prices were quite low during those times in which this project should have held its verification process. Unfortunately, considering the cost of consultancy, VVB and GS fees for a verification process, it was not additional financial burden for Project Owner without meaningful revenue, to verify and issue the associated VERs. However, after completion of Crediting Period Renewal 1, fourth monitoring period verification has been initiated.

A.1.1. Eligibility of the project under Gold Standard

The project activity meets the eligibility criteria as per section 3.1.1 of the GS4GG Principles & Requirements document as described below:

- The Project applies ACM0002: Grid-connected electricity generation from renewable sources --- Version 21.0.
- The project type is power generation using Wind Energy, an eligible project type per 2.1.2 a) and 2.1.2 b) of the Eligible Project Types under Renewable Energy Activity Requirements.
- The project activity results in the displacement of electricity from thermal power plants while contributing to the sustainable development of Turkey. Hence, the Project contributes to the Gold Standard Vision and Mission.

- Wind power is an approved project type and does not require approval from Gold Standard.
 - This project activity is not associated with geo-engineering or energy generated from fossil fuel or nuclear fossil fuel switch, nor does it enhance or prolong such energy generation.
 - The Project is not registered with any other schemes.
- a) General Eligibility Criteria under Renewable Energy Activity Requirements
Project Type: The project type is eligible as discussed above. Aliaga WFP is a wind power project. There is no change regarding the type of the project during this renewal of the crediting period.
- b) Project Location: The Project is located in Turkey, which is not located in an HCV area. The location of the project is given under Section A.2 of this report. For this renewal of crediting period, there is no change in the location of the Aliaga WFP. Aliaga wind farm project seeks registration only in the GS4GG program. The proposed project activity has not participated in other emissions trading programs, other binding limits, other forms of environmental credits or other GHG programs. Any other GHG programs do not reject this Project. Therefore, no double counting of impacts is potentially in this project activity. This information is confirmed in the no-double counting declaration by the project owner. Thus, the Project is eligible.
- c) Project Scale: The Project is a large-scale project.
- d) Host Country Requirements: There are no additional laws that came into force that have an impact on the project activity, and the project activity is still in line with the available law and regulations. The proposed project activity complies with applicable Turkey's laws and environmental, ecological and social regulations, including the law on investment, the law on environmental protection, the electricity law, the labour code, the law on gender equality, the land law. Bergama RES Enerji Üretim A.Ş. has been granted a generation license as WPP for a 120 MW wind power plant by EMRA. "Environmental Impact Assessment (EIA) Is Not Required" certificate was granted on 26 August 2013 to the Project Activity for 120 MW installed capacity by the Ministry of Environment and Urban Planning.

Contact Details: This information has been given under Appendix 2 in this PDD. There is no change regarding information about the contact details of the Aliaga WFP.

- Legal Ownership: This information has been given in PDD. The Legal Ownership specified in the first crediting period has not changed after the renewal of crediting period. Bergama RES Enerji Üretim A.Ş. which is legal developer and owner of the project.

- Other Rights: This information has been given in PDD. The legal rights specified in this crediting period have not changed after the crediting period renewal process. Bergama RES Enerji Üretim A.Ş. has the legal rights for the VER credits that will be issued under Gold Standard.

- Official Development Assistance (ODA) Declaration: The project developer has already submitted the Official Development Assistance (ODA) declaration.

- The project helps Turkey stimulate and commercialise the use of grid-connected renewable energy technologies and markets. After the renewal of crediting period, the project type has not changed. So, it is still an eligible type under Gold Standard for the Global Goals. In addition, Aliaga WFP demonstrates its contribution to the Sustainable Development Goals and impact on SDG 13, SDG 8 and SDG 7. The project contributed to mentioned SDGs (SDG 13, SDG 8 and SDG 7) before the renewal of crediting period. The project also will continue to contribute with many Safeguarding Principles as it did in the first crediting period. There was no update after the renewal of crediting period regarding this issue.
- The emissions reduction calculations are based on two main parameters: the energy produced and the grid emission factor. The project baseline is still the "ACM0002 "Grid-connected electricity generation from renewable sources". The project activity is still in line with the first crediting period. There will be no changes to the Eligibility Principles, Criteria and Requirements during this new crediting period.
- After the renewal of crediting period, there were no updates to the Gold Standard activity, product, and methodology specific Requirements. For this crediting period, the specified product requirements are the same; Product Requirements applied: GHG Emissions Reduction & Sequestration, Units/Products: VERs

The project activity meets the design certification renewal criteria as per section 5.1.47 of the GS4GG Principles & Requirements document as described below:

- a) There is no change in the Project as related to the General Eligibility Criteria
- b) The project meets GS4GG updates according to Gold Standard Requirements
- c) The baseline scenario is identified according to the "Baseline Methodology Procedure" of ACM0002 ver.21. The project activity is the installation of a new grid-connected wind farm with 36 turbines and is not modification/retrofit of an existing grid-connected power plant. Therefore, there is not any impact of change on the Eligibility Principles, Criteria and Requirements.

The Project applies ACM0002: Grid-connected electricity generation from renewable sources --- Version 21.0.

Aliaga WFP is not registered with any other voluntary or compliance schemes, and no potential exists for double counting of impacts. No GHG related environmental credits are applied to the Turkish power sector. Moreover, Turkey's GS735 Aliaga Wind Farm Project is not included in an ETS or other GHG trading mechanism. Since an ETS is not implemented in Turkey, an emission reduction cap has not been enforced for any sector. As an ETS is not implemented in Turkey, no double-counting risk exists for Turkey and this project.

This information is confirmed in the no-double counting declaration by the Bergama RES Enerji Üretim A.Ş.³ If any such risk of double counting exists in Turkey, the Project Developer (Bergama RES Enerji Üretim A.Ş.) shall retire eligible units equal to the quantity of Gold Standard VERs.

A.1.2. Legal ownership of products generated by the project and legal rights to alter use of resources required to service the project

Bergama RES Enerji Üretim A.Ş. is the developer and owner of the Project. The Republic of Turkey is the host country. Turkey has recently ratified the Kyoto Protocol (on 5

³ Necessary Commitment Letter has been provided to the VVB.

February of 2009). Turkish National Focal Point to the UNFCCC is the Ministry of Environment and Forestry⁴.

As the project developer, Bergama RES Enerji Üretim A.Ş. believes that efficient utilization of all kinds of natural resources with harmony coupled with responsible environmental considerations is vital for the sustainable development of Turkey and the World. This has been a guiding factor for the shareholders towards the designation and installation of a wind power project. Other than the objective of climate change mitigation through a significant reduction in greenhouse gas (GHG) emissions, the Project has been carried out to provide a social and economic contribution to the region in a sustainable way. The benefits that the realization of the Project will gain compared to the business-as-usual scenario can be summarized under four primary indicators:

Environmental

The project activities replace the grid electricity, which comprises different fuel sources causing greenhouse gas emissions. By substituting in the consumption of these fuels, it contributes to the conservation of water, soil, flora, and faunas. It transfers these natural resources and the additional supply of these primary energy sources to future generations. In the absence of the project activity, an equivalent amount of electricity would have been generated from the power plants connected to the grid, most of which are based on fossil fuels. Thus, the Project is replacing the greenhouse gas emissions (CO₂, CH₄) and other pollutants (SO_x, NO_x, particulate matters) from extraction, processing, transportation, and burning of fossil fuels for power generation connected to the national grid.

Economical

Firstly, the Project helps accelerate the growth of the wind power industry and stimulate the designation and production of renewable energy technologies in Turkey. Then, other entrepreneurs, irrespective of the sector, are encouraged to invest in wind power generations. It also assists in reducing Turkey's increasing energy deficit and

⁴ UNFCCC, list of the National Focal Points <https://unfccc.int/process/parties-non-party-stakeholders/parties/national-focal-point>

diversifying the electricity generation mix while reducing import dependency. Importantly, rural development is maintained in the areas around the project site by providing infrastructural investments to these remote villages.

Social

All project activities enhance local employment during the construction and operation of the wind farm. As a result, increased job opportunities and project trade activities partially eliminated local poverty and unemployment. Construction materials for the foundations, cables, and other auxiliary equipment were preferentially sourced locally. Moreover, as a contribution of the Project to the region's welfare, the quality of the electricity consumed in the region is increased by local electricity production, which also contributes to decreasing distribution losses.

Technological

The proposed Project's implementation contributes to the broader deployment of wind power technology locally and nationally. It demonstrates the viability of larger grid-connected wind farms that support improved energy security, alternative sustainable energy, and renewable energy industry development. This will also strengthen the pillars of the Turkish electricity supply based on ecologically sound technology.

A.2 Location of project

The turbines are located on top of the four hills, namely Danişment, Dutluyayla, Halayık and Sıyırdım. The residential areas nearby are İsmaili, Seklik and Atçılar. Seklik Village and Atçılar Villages are approximately 1 km away, and İsmaili Village is 2 km away from the Project Area; the closest turbine to the nearest house in Seklik village is the turbine numbered T48 about 600 m away⁵.

⁵ Please See Page 17 of the latest PIF dated 04/2013

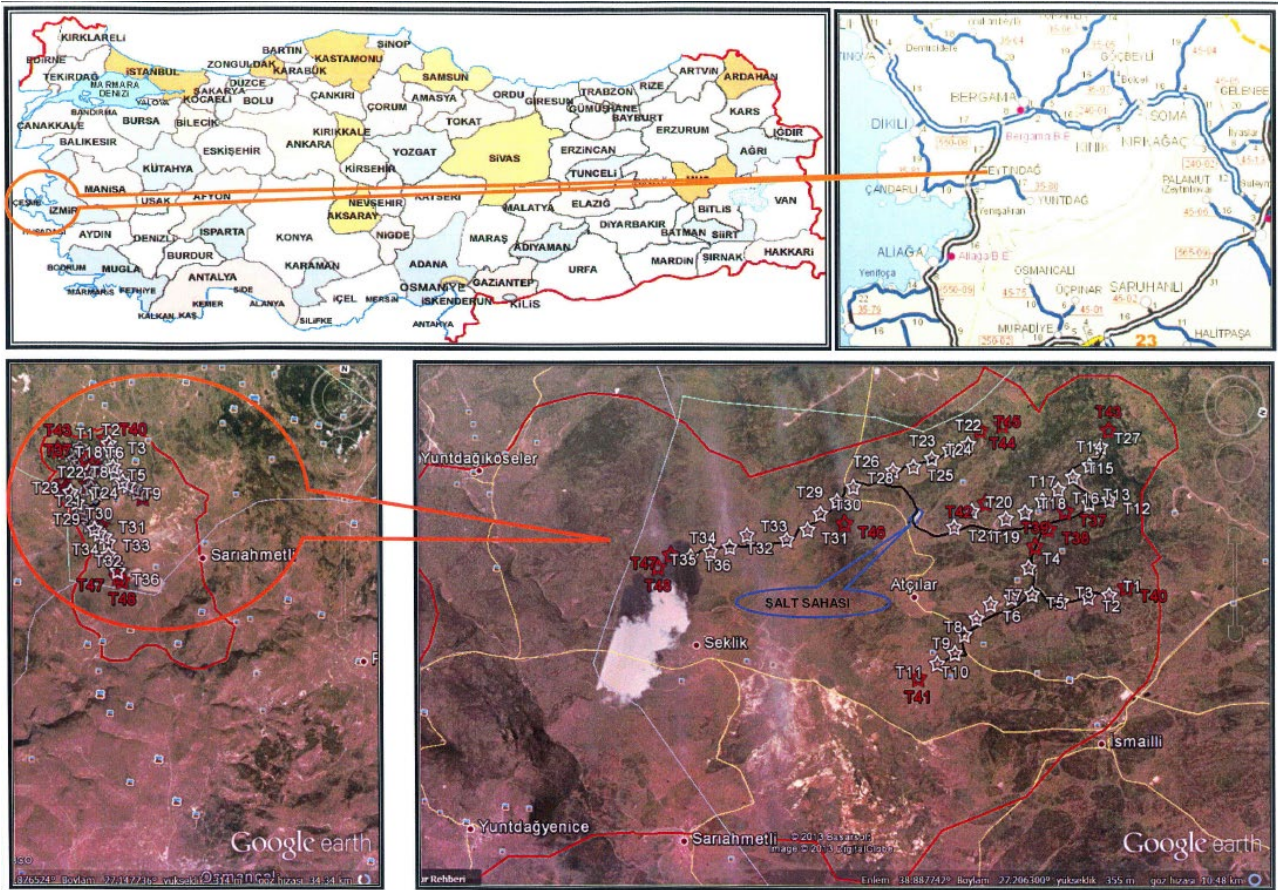


Figure 1 Location of Project Activity

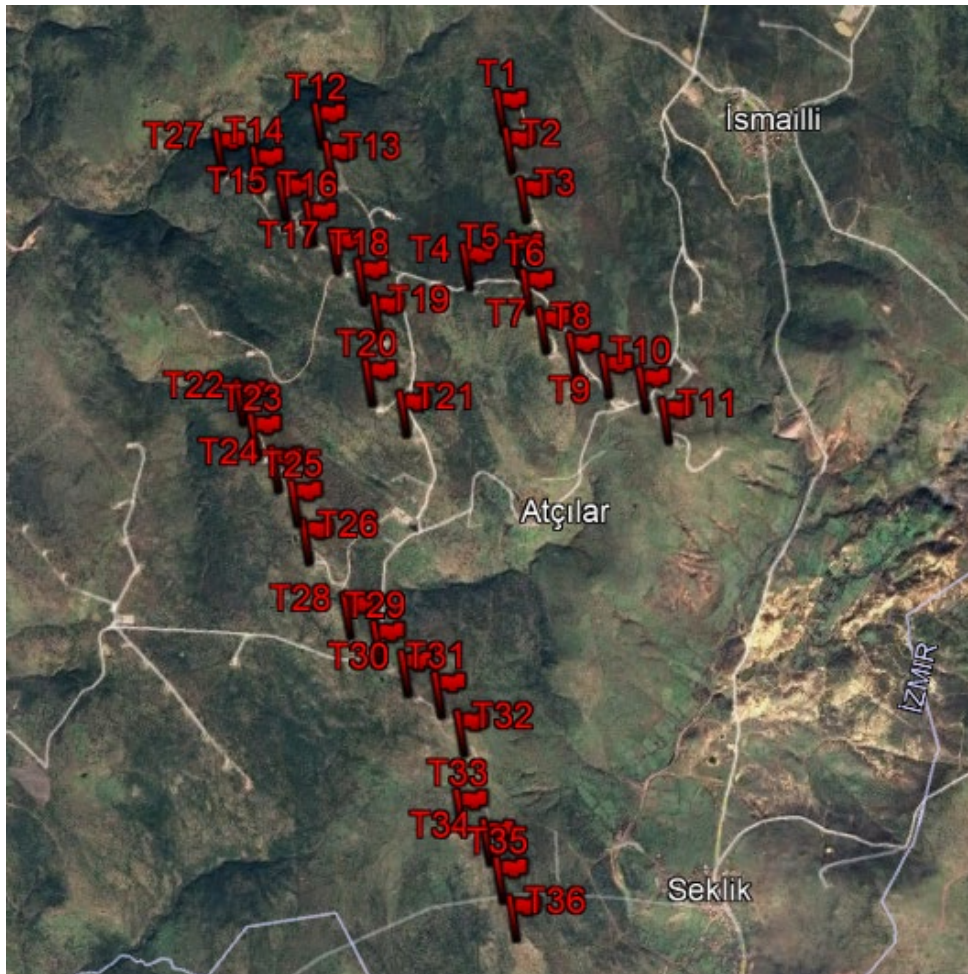


Figure 2 Location of Turbines

Table 3 Geographical Coordinates of the turbines operational in the Project Activity⁶

Wind Turbine No.	Latitude (North)	Longitude (East)	Wind Turbine No.	Latitude (North)	Longitude (East)
1	38°55'54.67"	27°11'32.42"	24	38°54'19.26"	27°10'48.82"
2	38°55'37.58"	27°11'42.34"	25	38°54'12.31"	27°10'55.69"
3	38°55'26.41"	27°11'48.42"	26	38°54'4.25"	27°11'0.45"
4	38°55'9.70"	27°11'34.96"	27	38°55'29.41"	27°10'18.43"

⁶ Geographical coordinates of the turbines are taken from the Generation License of the Project Activity.

Wind Turbine No.	Latitude (North)	Longitude (East)	Wind Turbine No.	Latitude (North)	Longitude (East)
5	38°55'13.54"	27°11'48.51"	28	38°53'49.34"	27°11'14.81"
6	38°55'5.58"	27°11'53.01"	29	38°53'43.97"	27°11'24.39"
7	38°54'57.65"	27°11'59.05"	30	38°53'38.41"	27°11'33.30"
8	38°54'53.19"	27°12'8.55"	31	38°53'34.73"	27°11'43.54"
9	38°54'49.87"	27°12'18.63"	32	38°53'26.99"	27°11'51.33"
10	38°54'47.84"	27°12'29.59"	33	38°53'9.76"	27°11'54.10"
11	38°54'41.66"	27°12'37.21"	34	38°53'4.07"	27°12'2.80"
12	38°55'37.74"	27°10'46.65"	35	38°52'56.21"	27°12'7.88"
13	38°55'29.36"	27°10'51.40"	36	38°52'48.38"	27°12'13.05"
14	38°55'26.25"	27°10'30.42"			
15	38°55'20.20"	27°10'39.34"			
16	38°55'15.09"	27°10'48.46"			
17	38°55'9.30"	27°10'56.83"			
18	38°55'3.16"	27°11'5.71"			
19	38°54'55.75"	27°11'11.71"			
20	38°54'41.06"	27°11'11.96"			
21	38°54'35.30"	27°11'22.82"			
22	38°54'33.07"	27°10'35.94"			
23	38°54'25.79"	27°10'41.40"			

A.3 Technologies and/or measures

The project currently comprises 46 wind turbines, 36 of which have a unit capacity of 2500 kW, and 10 of them have a unit capacity of 3000 kW. Nordex is decided as an equipment provider due to the outstanding features of its product regarding safety factors, simple, durable design for low maintenance and long-life operation, high efficiency, and pleasing visual appearance. The key parameters about the technical design of the selected model Nordex N90 turbines are listed below in Table 4; and, the key parameters about the technical design of the chosen model Nordex N117 turbines are listed below in Table 4 and Table 5.

Table 4: Technical specifications of Nordex N90 turbines

Specifications	Nordex N90
<i>Rated Power (kW)</i>	2,500
<i>Rotor Diameter (m)</i>	90
<i>Hub Height (m)</i>	80
<i>Num. of Blades</i>	3
<i>Swept Area (m²)</i>	6,362
<i>Cut-out wind speed (m/s)</i>	25

Table 5: Technical specifications of Nordex N117 turbines

Specifications	Nordex N117
<i>Rated Power (kW)</i>	3,000
<i>Rotor Diameter (m)</i>	116,8
<i>Hub Height (m)</i>	91
<i>Num. of Blades</i>	3
<i>Swept Area (m²)</i>	10,715
<i>Cut-out wind speed (m/s)</i>	25

The project activity will achieve emission reductions by avoiding CO₂ emissions from the business-as-usual scenario electricity generation produced by mainly fossil fuel-fired power plants within the Turkish national grid (Figure 2). Total emission reduction over the 7-year crediting period is expected to reach **1,339,317** tCO₂e with the assumed annual total registered net electricity generation of **294,900 MWh**.

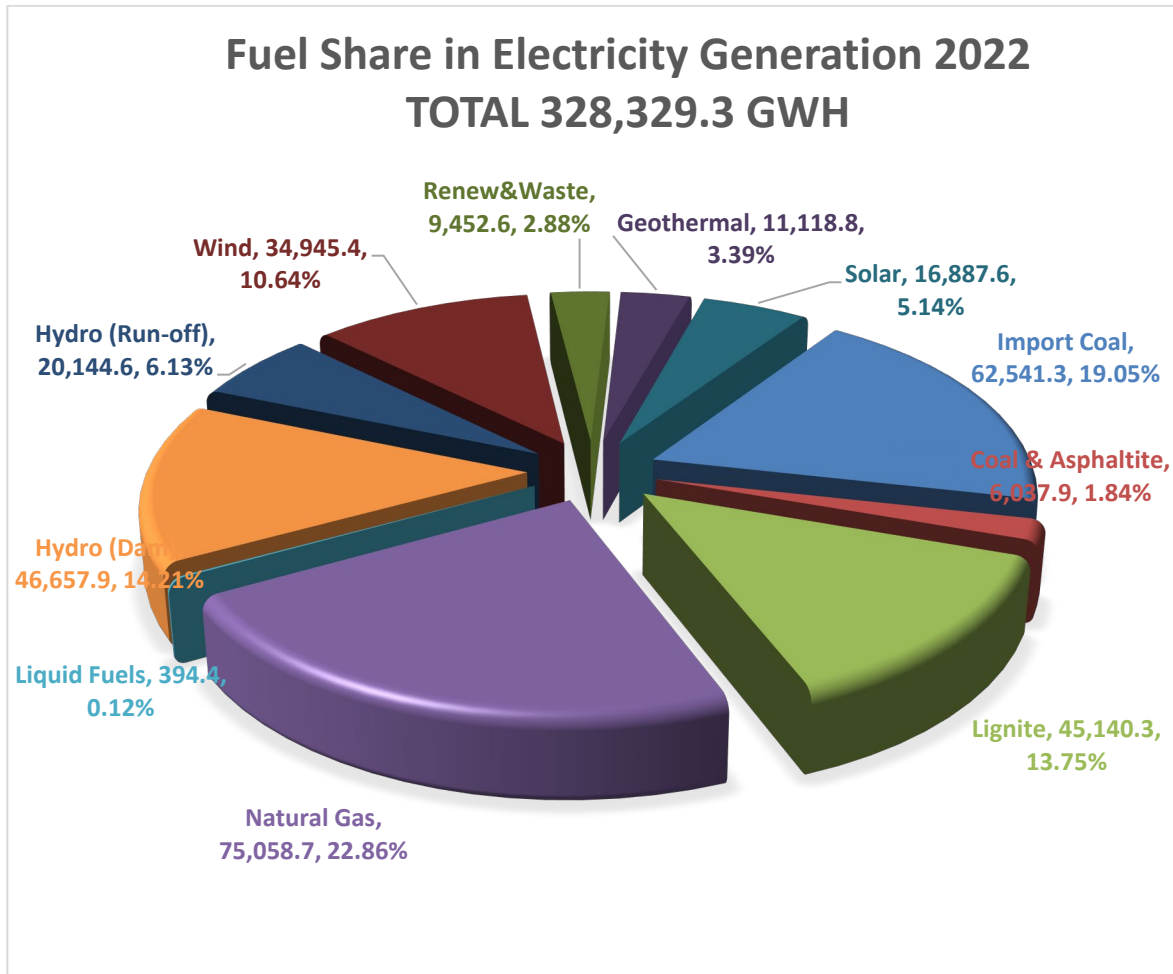


Figure 3 Share of Sources in Electricity Generation 2022⁷

Although Turkey has an excellent wind resource, substantial space, a reasonably good electrical infrastructure, and an impending electricity shortage, it uses negligible capacity (less than 4%) of its onshore potential, estimated as 47,849.44 MW by the Renewable Energy General Directorate.⁸ Lack of attractive incentives and tax advantages, limited grid access, and limited turbine supply constitutes the significant barriers to wind energy.

⁷ See, TEİAŞ, Annual Development of Electricity Generation- Consumption and Losses in Turkey (2022); <https://webim.teias.gov.tr/file/58903f7f-c41b-4d7d-9f59-98941f8fb419?download>

⁸ See, Page 40, https://www.mmo.org.tr/sites/default/files/T%C3%BCrkiyeEnerjiG%C3%B6r%C3%BCn%C3%BCm%C3%BC_2018_Sunumu_%2812.04.2018%29.pdf

Renewable energy law, enacted in 2005, which had amendments at the end of 2010 regarding feed-in tariffs, stipulates a purchase obligation by the retail companies for 10 years with a purchase price of 7.3 USD/kWh (~5.5 €/kWh) for the power plants put in operation by the end of 2015⁹. This tariff was much below the average remuneration in the leading wind markets. It did not constitute a sufficient incentive for investments in Turkey's minor experienced wind energy sector. The revenues calculated according to these regulations are considered in the investment planning of the projects. They do not lead to returns that allow the Project to be profitable or attractive for capital investors and lenders.

These numbers and figures show the contribution of a wind power project like Aliaga WFP to the development of environmentally friendly electricity generation instead of the described Turkish mix of hydroelectric and fossil-fuelled power plants, which are better known financially more attractive from an investor's point of view. The emission reductions would not occur in the absence of the proposed project activity because of various real and perceived risks that impede the provision of financing.

Aliaga WFP, as a large wind power plant project, is a perfect project to demonstrate the long-term potential of wind energy to efficiently reduce GHG emissions and diversify and increase the security of the local energy supply contributing to sustainable development. Wind-driven turbines will rotate in generators, and electricity generated here will be transferred to the grid for the consumer without any greenhouse gas emissions. The Gold Standard certification shall help realize this seminal technology by compensating for the lack of financial incentives in the Turkish renewable energy market.

The second 7-year crediting period is from 09/04/2017 to 08/04/2024.

The end date for the First Crediting Period was 08/04/2017. For this reason, the CPII start date is now set as 09/04/2017. And accordingly, the end date of the CPII is now set as 08/04/2024. Due to a delay in the completion of re-validation beyond the last

⁹ See : http://www.epdk.org.tr/documents/elektrik/mevzuat/kanun/Elk_Kanun_Yek_Kanun.doc (List I in page 10)

date of the Second Crediting Period, no ERs will be issued for the delay period. The first submission to GS for the design certification renewal is on 18/07/2022. The Project Activity will be eligible to certify the period from 18/07/2022 to 08/04/2024. Fourth monitoring period has been initiated and period is between 19/07/2022 – 30/06/2023. In addition, the third 7-year crediting period is expected to be from 09/04/2024 to 08/04/2031.

Voluntary carbon markets sustained a loss after 2012, which has continued until 2020. Carbon certification processes created an extra expense, not revenue, for this period. Project Owner has started the certification process for second crediting period between 19/07/2022 – 30/06/2023.

A.4 Scale of the project

Since the Project's installed capacity is 90.0 MWe, which consists of a total of 36 turbines (36x2.5 MWe), the Aliaga WFP project is a large-scale project.

A.5 Funding sources of project

A significant amount of bank loan has been received for this project. Therefore, the project activity doesn't have any public funding or Official Development Assistance (ODA) funding.

SECTION B. APPLICATION OF APPROVED GOLD STANDARD METHODOLOGY (IES) AND/OR DEMONSTRATION OF SDG CONTRIBUTIONS

B.1. Reference of approved methodology (ies)

For the determination of the baseline, the official methodology ACM0002 version 21.0.0, "Grid-connected electricity generation from renewable sources"¹⁰, is applied, using conservative options and data as presented in the following section. This methodology refers to four Tools, which are:

1. Tool to calculate the emission factor for an electricity system (Version 07.0.0)¹¹;
2. Tool for the demonstration and assessment of additionality (Version 7.0.0)¹²;
3. Tool to determine the remaining lifetime of equipment (Version 01.0.0)¹³
4. Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period (Version 03.0.1)¹⁴

B.2. Applicability of methodology (ies)

The choice of methodology ACM0002 v21 is justified as the proposed project activity meets its applicability criteria:

¹⁰ <https://cdm.unfccc.int/methodologies/DB/HF3LP6O41YY0JIP1DK6ZRJO9RSCX3S>

¹¹ <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-07-v7.0.pdf>

¹² <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-01-v7.0.0.pdf>

¹³ This tool is applied to demonstrate the total lifetime of the onshore wind turbines
<https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-10-v1.pdf>

¹⁴ <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-11-v3.0.1.pdf>

Applicability Conditions of ACM002	Applicability to This Project Activity
<p>This methodology is applicable to grid-connected renewable energy power generation project activities that:</p> <ul style="list-style-type: none"> a) Install a Greenfield power plant; b) Involve a capacity addition to (an) existing plant(s) c) Involve a retrofit of (an) existing operating plants/units d) Involve a rehabilitation of (an) existing plant(s)/unit(s) or e) Involve a replacement of (an) existing plant(s)/unit(s) 	<p>Aliaga WFP is a grid-connected renewable power generation project activity that install a wind power plant at a site where no renewable power plant was operated prior to the implementation of the project activity (Greenfield plant). Thus, it meets the said applicability condition.</p>
<p>The project activity may include renewable energy power plant/unit of one of the following types: hydro power plant/unit with or without reservoir, wind power plant/unit, geothermal power plant/unit, solar power plant/unit, wave power plant/unit or tidal power plant/unit.</p>	<p>The project activity is the installation of 46 wind turbine generators (as previously discussed). Hence, meets this criterion.</p>
<p>In the case of capacity additions, retrofits, rehabilitations or replacements (except for wind, solar, wave or tidal power capacity addition projects the existing plant/unit started commercial operation prior to the start of a minimum historical reference period of five years, used for the calculation of baseline emissions and defined in the baseline emission section, and no capacity expansion, retrofit, or rehabilitation of the plant/unit has been undertaken between the start of this minimum historical reference period and the implementation of the project activity.</p>	<p>The project activity does not involve capacity additions, retrofits, rehabilitations or replacements. Hence this criterion is not applicable to the project activity.</p>
<p>In case of hydro power plants, one of the following conditions shall apply:</p>	<p>The project activity is not a hydro power plant. Hence this applicability criterion is not relevant to the project activity.</p>

Applicability Conditions of ACM002	Applicability to This Project Activity
<p>a) The project activity is implemented in existing single or multiple reservoirs, with no change in the volume of any of the reservoirs, or</p> <p>b) The project activity is implemented in existing single or multiple reservoirs, where the volume of the reservoir(s) is increased and the power density calculated using equation (3), is greater than 4 W/m^2, or</p> <p>c) The project activity results in single or multiple reservoirs and the power density, calculated using equation (3), is greater than 4 W/m^2 or</p> <p>d) The project activity is an integrated hydro power project involving multiple reservoirs, where the power density for any of the reservoirs, calculated using equation (3), is lower than or equal to 4 W/m^2, all of the following conditions shall apply:</p> <ol style="list-style-type: none"> i. The power density calculated using the total installed capacity of the integrated project, as per equation (4), is greater than 4 W/m^2 ii. (ii) Water flow between reservoirs is not used by any other hydropower unit which is not a part of the project activity iii. Installed capacity of the power plant(s) with power density lower than or equal to 4 W/m^2 shall be: <ul style="list-style-type: none"> • Lower than or equal to 15 MW, and • Less than 10 per cent of the total installed capacity of integrated hydro power project 	

Applicability Conditions of ACM002	Applicability to This Project Activity
<p>In the case of integrated hydro power projects, project proponent shall:</p> <ul style="list-style-type: none"> a) Demonstrate that water flow from upstream power plants/units spill directly to the downstream reservoir and that collectively constitute to the generation capacity of the integrated hydro power project, or b) Provide an analysis of the water balance covering the water fed to power units, with all possible combinations of reservoirs and without the construction of reservoirs. The purpose of water balance is to demonstrate the requirement of specific combination of reservoirs constructed under CDM project activity for the optimization of power output. This demonstration has to be carried out in the specific scenario of water availability in different seasons to optimize the water flow at the inlet of power units. Therefore this water balance will take into account seasonal flows from river, tributaries (if any), and rainfall for minimum five years prior to implementation of CDM project activity. 	<p>The project activity is not a hydro power plant. Hence this applicability criterion is not relevant to the project activity.</p>
<p>The methodology is not applicable to:</p> <ul style="list-style-type: none"> a) Project activities that involve switching from fossil fuels to renewable energy sources at the site of the project activity, since in this case the baseline may be the continued use of fossil fuels at the site; b) Biomass fired power plants/units 	<p>Project activity does not involve:</p> <ul style="list-style-type: none"> a) Switching from fossil fuels to renewable energy sources at the site of the project activity. b) Biomass fired plants. Hence this criterion is not applicable.

Applicability Conditions of ACM002	Applicability to This Project Activity
<p>In the case of retrofits, rehabilitations, replacements, or capacity additions, this methodology is only applicable if the most plausible baseline scenario, as a result of the identification of baseline scenario, is “the continuation of the current situation, i.e. to use the power generation equipment that was already in use prior to the implementation of the project activity and undertaking business as usual maintenance”.</p>	<p>The project is not a retrofit, rehabilitations, replacements, or capacity addition; hence this applicability criterion is not relevant.</p>
<p>In addition, the applicability conditions included in the tools referred to above apply.</p>	<p>Applicability conditions of the applied tool are justified.</p>

Applicability Conditions of the Tools employed	Applicability of the Tool to This Project Activity
<p>Tool to calculate the emission factor for an electricity system (Version 07.0.0)</p>	
<p>a) This tool may be applied to estimate the OM, BM and/or CM when calculating baseline emissions for a project activity that substitutes grid electricity that is where a project activity supplies electricity to a grid or a project activity that results in savings of electricity that would have been provided by the grid (e.g. demand-side energy efficiency projects)</p> <p>b) Under this tool, the emission factor for the project electricity system can be calculated either for grid power plants only or, as an option, can include off-grid power plants. In the latter case, two sub-options under the step 2 of the tool are available to the project participants, i.e. option IIa and option IIb. If option IIa is chosen, the conditions specified in “Appendix 1: Procedures related to off-grid power generation” should be met.</p>	<p>a) This condition is applicable to the Project Activity since the project activity substitutes grid electricity, and thus, the Project results in savings of electricity that the grid would have provided.</p> <p>b) The emission factor used for this Project Activity has been calculated for grid power plants only.</p> <p>c) This Project is not a CDM Project.</p> <p>d) This Project Activity doesn’t employ biofuels.</p>

Applicability Conditions of the Tools employed	Applicability of the Tool to This Project Activity
<p>Namely, the total capacity of off-grid power plants (in MW) should be at least 10 per cent of the total capacity of grid power plants in the electricity system; or the total electricity generation by off-grid power plants (in MWh) should be at least 10 per cent of the total electricity generation by grid power plants in the electricity system; and that factors which negatively affect the reliability and stability of the grid are primarily due to constraints in generation and not to other aspects such as transmission capacity.</p> <p>c) In case of CDM projects the tool is not applicable if the project electricity system is located partially or totally in an Annex I country.</p> <p>d) Under this tool, the value applied to the CO2 emission factor of biofuels is zero</p>	
Tool for the demonstration and assessment of additionality (Version 7.0.0)	
<p>a) The use of the “Tool for the demonstration and assessment of additionality” is not mandatory for project participants when proposing new methodologies. Project participants may propose alternative methods to demonstrate additionality for consideration by the Executive Board. They may also submit revisions to approved methodologies using the additionality tool.</p> <p>b) Once the additionally tool is included in an approved methodology, its application by project participants using this methodology is mandatory</p>	<p>a) The additionality of this Project Activity was evaluated at the First Crediting Period employing the Tool for the demonstration and assessment of additionality (Version 5.2). Thus, no new additionality assessment was carried out during this Crediting Period Renewal.</p> <p>b) The additionality of this Project Activity was evaluated at the First Crediting Period. Thus, no new additionality assessment was carried out during this Crediting Period Renewal.</p>

Applicability Conditions of the Tools employed	Applicability of the Tool to This Project Activity
Tool to determine the remaining lifetime of equipment (Version 01.0.0)	
<p>a) The tool may be used for project activities which involve the replacement of existing equipment with new equipment or which retrofit existing equipment as part of energy efficiency improvement activities.</p>	<p>a) The tool is used for this Project Activity to determine the project’s total lifetime. Although this Project Activity doesn’t involve the replacement of existing equipment during the Second Crediting Period there were newly added turbines. This tool states that:</p> <p>Project participants may use one of the following options to determine the remaining lifetime of the equipment:</p> <p>(a) Use manufacturer’s information on the technical lifetime of equipment and compare to the date of first commissioning; (b) Obtain an expert evaluation; (c) Use default values.</p> <p>Option c is chosen and the default values stated in the methodology is used. From the table in this tool it can be seen that for the technical lifetime onshore wind turbines 25 years can be accepted.</p>
Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period (Version 03.0.1)	
<p>a) This tool provides a stepwise procedure to assess the continued validity of the baseline and to update the baseline at the renewal of a crediting period, as required by paragraph 49 (a) of the modalities and procedures of the clean development mechanism. The tool consists of two steps. The first step provides an approach to evaluate</p>	<p>a) Detailed assessment of the validity of the original baseline as per the Tool was carried out in Section B.4 of this PDD. Please see Section B.4.</p>

Applicability Conditions of the Tools employed	Applicability of the Tool to This Project Activity
<p>whether the current baseline is still valid for the next crediting period. The second step provides an approach to update the baseline in case that the current baseline is not valid anymore for the next crediting period.</p>	

B.3. Project boundary

As per the Approved Large Scale Consolidated Methodology ACM0002, the project boundary is "The spatial extent of the project boundary includes the project power plant and all power plants connected physically to the electricity system that the CDM project power plant is connected to." Correspondingly, the project boundaries include the project site and all power plants attached to the Turkish National Grid in this project activity.

The Project uses wind energy to produce electricity. The kinetic power of the wind is converted to electrical energy, which then will be transferred to the grid. Back-up power generators in the wind farm will only be used when the wind farm is out of service and power cannot be supplied from the grid. Hence, emissions due to usage of backup power generation are expected to be very low and are taken to be zero complying with the Tool.

The project activity and baseline scenario are defined as the greenhouse gasses and emission sources. As a result, the project boundary for Aliaga WFP is as demonstrated in Figure 4 below:

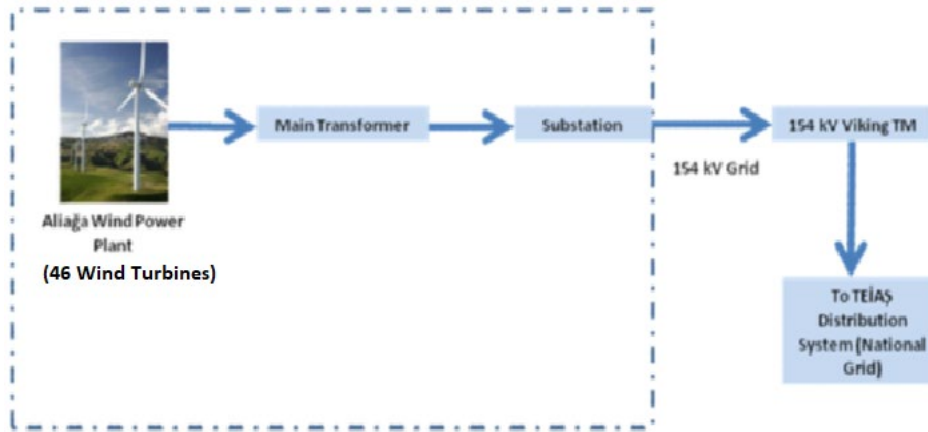


Figure 4 Project Boundary

Based on the above operation diagram, the baseline and project activity related greenhouse gases which are considered in baseline calculation is given below, in Table 6:

Table 6 Emissions sources included in or excluded from the project boundary

	Source	GHGs	Included?	Justification/Explanation
Baseline scenario	CO2 Emissions from electricity generation in fossil fuel-fired power plants that are displaced due to the project activity	CO ₂	Yes	Main emission source: Fossil fuels fired for electricity generation cause CO ₂ emissions. It is included in the baseline calculation to find the displaced amount by the project activity.
		CH ₄	No	Even though there may be some CH ₄ and N ₂ O emissions during electricity generation are negligible and not included in the baseline calculation to be conservative and comply with Table-1 of the methodology (ACM0002 v21.0) (page 6).
		N ₂ O	No	
Project scenario	Emissions during construction and operation of the project activity	CO ₂	No	Even though there may be some CO ₂ emissions during construction are negligible
		CH ₄	No	There are no CH ₄ emissions during construction and operation.

		N ₂ O	No	There are no N ₂ O emissions during construction and operation.
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B.4. Establishment and description of baseline scenario

The baseline scenario is identified according to the "Baseline Methodology Procedure" of ACM0002 ver.21. The project activity is the installation of a new grid-connected wind farm with 36 turbines and is not modification/retrofit of an existing grid-connected power plant. So, the first identification of this procedure is selected for the proposed project activity, which is described as:

"Electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the combined margin (CM) calculation of Ministry of Energy and Natural Resources of Turkey".

The methodological tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period" (version 03.0.1) is adopted to assess the continued validity of the baseline and to update the baseline. This Tool provides a stepwise procedure to determine the continued validity of the baseline and to update the baseline at the renewal of a crediting period, as required by paragraph 49 (a) of the modalities and procedures of the clean development mechanism. According to this tool, the following steps are applied.

Step 1: Assess the validity of the current baseline for the next crediting period

The validity of the current baseline is assessed using the following Sub-steps:

Step 1.1 Assess compliance of the current baseline with relevant mandatory national and/or sectoral policies.

During the First Crediting Period, the baseline scenario for the project had been defined as:

"Electricity delivered to the grid by the project would have otherwise been generated by the operation of grid-connected power plants."

The current baseline of the project is the same as the first crediting period and complies with the existing legal framework. No additional laws that impacted the project activity came into force, and the project activity is still in line with the available law and regulations.

Step 1.2 Assess the impact of circumstances.

There has been no significant deviation or change in the market characteristic during the first crediting period.

To describe the baseline and its development for the project activity, Turkey's long-term electricity demand and supply projections are assessed.

Turkey's long-term electricity demand and supply projections are assessed to describe the baseline and development for the project activity.

Demand for electricity in Turkey is growing rapidly, with an average of %¹⁵ for the previous ten years. TEİAŞ, responsible for grid reliability, has prepared an electricity demand projection for the next ten years (2023-2032) for Turkey and announced on July 2019, given in Figure 5 and Figure 6, reflecting the continuation of current demand growth¹⁶.

Table 7: Low and High Demand Projection Scenarios for Ten Years Period (GWh)

Scenarios	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
High Scenario	235,764	244,790	254,017	263,170	272,333	281,350	290,593	299,869	309,408	319,153
Low Scenario	214,925	219,940	225,089	230,102	235,013	239,630	244,301	248,889	253,587	258,200

¹⁵ See, https://www.teias.gov.tr/tr-TR/ilgili-raporlar_10_Yillik_talep_tahminleri_raporu
https://webim.teias.gov.tr/file/f09f9857-4844-42b0-a0fa-74cdacfe4013?download_d

¹⁶ See, https://www.teias.gov.tr/tr-TR/ilgili-raporlar_10_Yillik_talep_tahminleri_raporu
https://webim.teias.gov.tr/file/f09f9857-4844-42b0-a0fa-74cdacfe4013?download_d

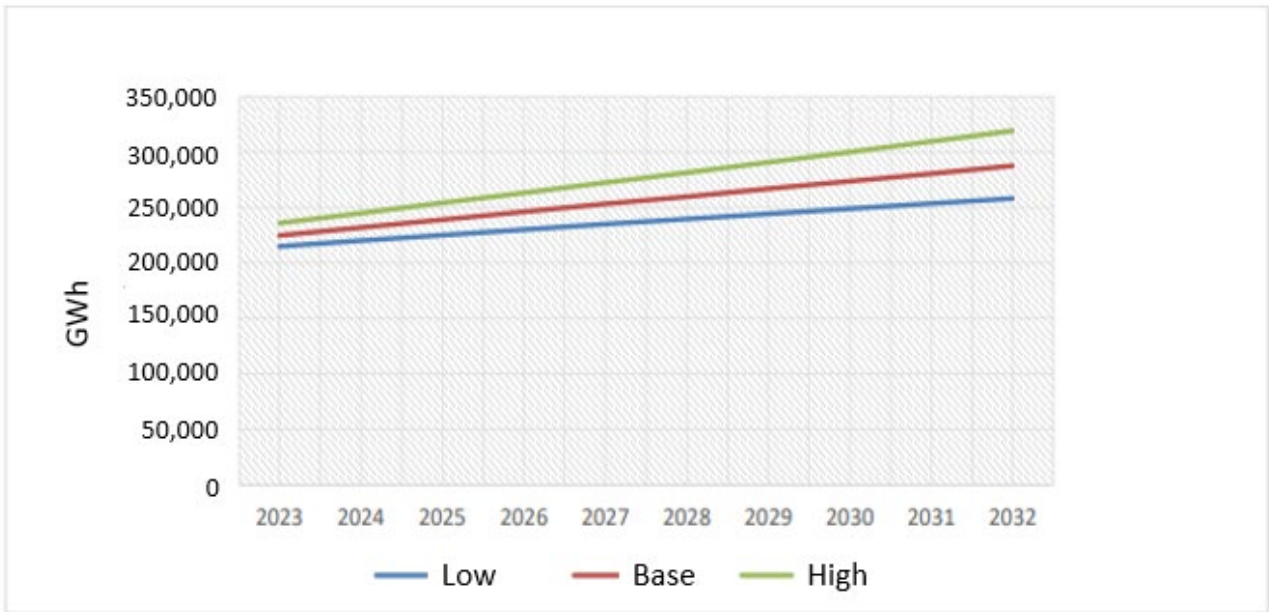


Figure 5 Electricity Demand Projections for Ten Years

This projection also forecasted electricity supplies considering all operational power plants under construction and newly licensed. Generation projection based on project generation is given in Figure 6.

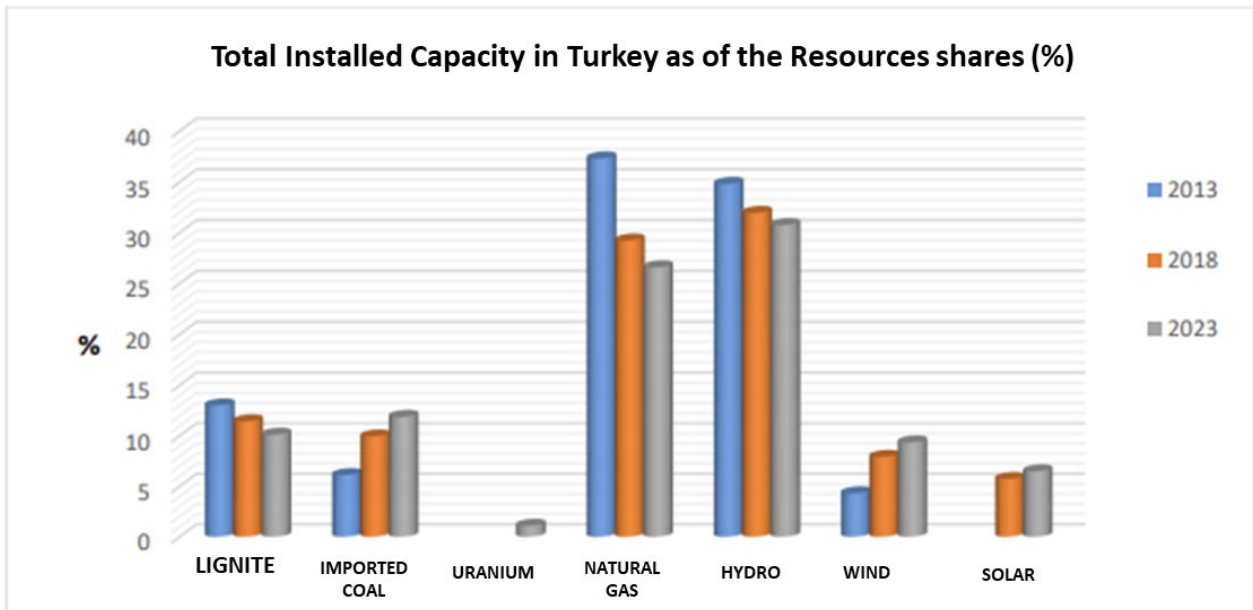


Figure 6 Total Installed Capacity in Turkey as of the Resources shares (%)¹⁷

According to the 5-year projection, it is clear that fossil fuels will remain the primary source for electricity generation (46% in 2023). Natural gas will continue to dominate the market while total imported fuel will still be 11%. Hydro will account for 30% of the mix, whereas all non-hydro renewable combined (geothermal/biogas/waste/wind) will be accountable for 15% of all electricity generation. This projection is consistent with continuing fossil fuel-dependent characteristics of the Turkish electricity sector.

Table 8 By Primary Energy Resources, Installed Capacity of Turkey (2009-2022)¹⁸

Unit :MW

	Coal	Fuel Oils	Natural Gas	RES (renewable energy sources) + Waste + Waste Heat	Multi Fuel	Hydro	Geothermal	Wind	Solar	TOTAL
2009	10,590.3	1,699.1	11,825.6	86.5	5,137.6	14,553.3	77.2	791.6	-	44,761.2

¹⁷ See, https://www.epdk.gov.tr/Detay/DownloadDocument?id=GTRjtj8aTa8=_ (page 104)

¹⁸ See, <https://webapi.teias.gov.tr/file/163dfadf-80d8-4271-baf8-bc0b76710177?download>

%	23.66	3.79	26.42	0.19	11.48	32.51	0.17	1.77	-	100.00
2022	21,099. 1	135.356	21,243. 9	2,354.6	4,891.8	31,571. 5	1,691.3	11,396. 2	9,425. 4	103,809. 3
%	20.32	0.13	20.46	2.27	4.71	30.41	1.63	10.98	9.08	100.00

In the light of the above analysis for the baseline scenario (continuation of the current situation), which is given by Table 7, it can be concluded that:

- Conclusion-1: Energy demand in Turkey has been increasing at significant rates for ten years, and it is expected to continue at least for the next ten years.
- Conclusion-2: Even all operational plants, construction phase plants, and licensed ones are considered to lack supply is projected after the year 2028. So, there is a significant need for electricity generation investments to satisfy demand. New power plants would otherwise generate the project activity to avoid power shortages in the coming years.
- Conclusion-3: Fossil fuels will dominate the generation mix for at least a midterm period (till the end of 2023) with a 46% share. Hydro included renewable will remain low with a 30% share, and non-hydro energy contribution will stay negligible with only 15% of the total share by the end of that period. This also shows that most new capacity additions will be fossil fuel-fired power plants.

The combination of the trends above indicates that the continuation of energy generation of Aliaga WFP would decrease the power amount from new grid-connected thermal plants.

Step 1.3 Assess whether the continuation of use of current baseline equipment(s) or an investment is the most likely scenario for the crediting period for which renewal is requested.

The technical lifetime of the project activity (including wind turbines) is defined as 25 years, and the equipment lifetime exceeds the crediting period for which renewal is requested. Equipment only requires regular maintenance. The baseline scenario identified at the validation of the project activity was the continuation of grid-connected electricity generation from renewable sources. Under this scenario, no investment from the project’s proponent or a third party (or parties) has been envisioned later specifically for the project.

Step 1.4 Assessment of validity of the data and parameters.

The emissions reduction calculations are based on two main parameters: The energy produced and the grid emission factor. The latter will be updated as explained in the next paragraph.

The emission factors and values for the calculation of the baseline emissions have been determined for the whole crediting period and parameters not monitored have been changed. Therefore, Step 2 has been applied.

Step 2: Update the current baseline and the data and parameters

This step is applicable since Step 1.4 showed that the current baseline needs to be updated accordingly with the new officially published national emission factor data.

Step 2.1: Update the current baseline

As confirmed in Step 1, during the First Crediting Period, the baseline scenario for the project had been defined as:

“Electricity delivered to the grid by the project would have otherwise been generated by the operation of grid-connected power plants.”

The current baseline of the project is the same as the first crediting period and complies with the existing legal framework. No additional laws that impacted the project activity came into force, and the project activity is still in line with the available law and regulations. No additional laws that impacted the project activity came into force, and the project activity is still in line with the available law and regulations. This conforms to the provisions of the latest version of the approved applicable methodology to the project activity, namely: ACM0002 version 21.0, “Grid-connected electricity generation from renewable sources”.

Step 2.2: Update the data and parameters

The new national circumstances impact the emission factor of the grid and thus on the project’s current baseline emissions. Accordingly, the grid emission factor is updated

according to the Turkish Ministry of Energy and Natural Resources publication, which indicates Turkey's National Electric Grid Emission Factor for the year 2021.¹⁹

So, that were used to calculate estimated emission reductions, the Turkish Ministry of Energy and Natural Resources published that Turkey's National Electric Grid Emission Factor (0.6345 tCO₂/MWh) was used for the third crediting period of this project

B.5. Demonstration of additionality

The additionality was already demonstrated in first validation.

B.5.1 Prior Consideration

N/A. According To PDD Template Guide, "only (non-CER) retroactive projects and all projects undergoing Design Changes to include new technologies/measures are required to demonstrate Prior consideration". Since the Project is regular and has no Design Change, it is marked as N/A.

B.5.2 Ongoing Financial Need

Investment analysis conducted during the First Crediting Period shows that the project is not economically feasible without GS VER credit income. Also, the sensitivity analysis confirms that the proposed project activity is unlikely to be financially attractive without the revenues from VERs as the IRR result (8.21% for 90 MW) is below the benchmark, which is 10.68%. Consequently, the project activity was deemed as additional.

Furthermore, the agreement signed with the turbine provider (Nordex) established a maintenance regime of the equipment. In line with this agreement, maintenance work is being carried out by Nordex every 6 months a year. This maintenance work of the turbines proves to be a significant financial burden for the Project Activity²⁰. Additionally, system usage fees that need to be paid by the Project Activity to the TEİAS is another important factor contributing to the project's expenditure²¹. In addition, in

¹⁹ See:

https://enerji.gov.tr//Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/TUESEmisyonFktr/Belgeler/TUESEF_Bilgi_Formu.pdf

²⁰ Payments made by the PO to the Nordex for the maintenance work are provided to the VVB for review.

²¹ System Usage payments are now provided to the VVB for review.

Turkey; transmission fee, forestry fee and public expenses have been rising due to high inflation in Turkey. This leads to increase payment liability for the company. Moreover, there are still loan payments have been made for the projects until 2029. Public expenses, such as interconnection fees to TEİAŞ and other regulatory costs, are recurring and constitute 2.9% of the annual budget. Forestry fees are annual charges incurred due to compliance with national regulations for land use, accounting for approximately 28% of the total project expenses annually. Therefore, carbon revenues derived from Gold Standard certification have played an essential role in helping Project Owners pay maintenance works of the equipment and system usage fees.²²

In light of the explanations provided above, both Option (a) and Option (b) effectively justify the ongoing financial need of the project by detailing how Gold Standard certification revenue is essential to covering key costs and ensuring the project's sustainability.

Moreover, IRR analysis conducted during the previous Crediting Period Renewal process was re-performed again with the carbon revenue added to show that the resulted IRR still stays below benchmark value. Carbon revenue is assumed to be 2.5 - 3.00 USD²³ per tonne. And the income generated by the carbon revenue is calculated with the estimated emission reductions amounts during the previous crediting period. However, actual prices are lower than that, so it is unfeasible for starting verification process for previous periods. The new IRR result (8.78 with the added carbon revenue shows that the resulting IRR (8.78%) still stays below the project activity's benchmark value (10.68%). This is further proof that the project needs the financial support that the carbon certification will enable.

The project activity satisfies all the "Tool for demonstrating and assessing additionality" criteria. Therefore, the Project is additional and still has ongoing financial need.

²² Declaration of the project owner on this issue has been provided to the VVB.

²³ World Bank, State and Trends of Carbon Pricing 2023 Report, Figure 14 on Page 41 of the <https://openknowledge.worldbank.org/bitstreams/bdd449bb-c298-4eb7-a794-c80bfe209f4a/download>

B.6. Sustainable Development Goals (SDG) outcomes

Relevant Target/Indicator for each of the three SDGs

SUSTAINABLE DEVELOPMENT GOALS TARGETED	MOST RELEVANT SDG TARGET	SDG IMPACT
		INDICATOR (PROPOSED OR SDG INDICATOR)
SDG 13: Climate Action (mandatory)	N/A	Emission reduction: 187,114 tCO2/yr
SDG 7: Affordable and clean energy	7.2 by using renewable energy systems	294,900 MWh/yr
SDG 8: Decent work and economic growth	8.8 by employment and decent work	22 employees 1 HSE Training/employee/yr

B.6.1 Explanation of methodological choices/approaches for estimating the SDG Impact

- SDG 7

Firstly, the Project helps accelerate the growth of the wind power industry and stimulates the designation and production of renewable energy technologies in Turkey. Then, other entrepreneurs, irrespective of the sector, are encouraged to invest in wind power generations. It also reduces Turkey's increasing energy deficit and diversifies the electricity generation mix while reducing import dependency, especially natural gas. Importantly, rural development is maintained in the areas around the project site by providing infrastructural investments to these remote villages. The Project is expected to generate 294,900 MWh/annually²⁴. The Project contributes to the following indicators 7.2.1 "Renewable energy share in the total final energy consumption" and following

²⁴ DEWI Micrositing Report 0719302A

target: 7.2 "By 2030, increase the share of renewable energy in the global energy mix substantially".

The project contributes to the following indicators 7.2.1 "Renewable energy share in the total final energy consumption" and following target: 7.2 "By 2030, increase substantially the share of renewable energy in the global energy mix"

- SDG 8

The employment of local people with the necessary technical qualifications for the required post is the priority and enhanced by all project activities during the wind farm operation. As a result, increased job opportunities and project business activities partially eliminated local poverty and unemployment. Construction materials for the foundations, cables and other auxiliary equipment were/are preferentially sourced locally. Moreover, as a contribution of the Project to the region's welfare, the quality of the electricity consumed in the region is increased by local electricity production, which also contributes to decreasing distribution losses.

The Project led to employment opportunities that would not have been possible in the baseline scenario. The Project provides local employment during the operation phase. It contributes to the following target 8.8. and following indicator 8.8.2. Furthermore, all workers are trained on health and safety issues during each monitoring period. Health and safety Training records or certificates will be provided during each monitoring period.

- SDG 13

The annual emission reduction estimated by the Project is 187,114 tonnes of tCO₂/year. While this amount of emissions is mitigated, technology transfer is also realized as benefitting from wind energy.

The Project contributes to improving the environmental situation in the region and the country as avoiding fossil fuel-based electricity will enhance the air quality and help to reduce the adverse effects on the climate. Through renewable technologies and wind-based electricity, sustainable and climate-friendly development is promoted.

This Project is expected to remove CO₂: 187,114 tCO₂/year.

It contributes to the following target 13.3 and following indicator 13.3.1.

For the emission factors that were used to calculate estimated emission reductions, the publication of the Turkish Ministry of Energy and Natural Resources, which indicates Turkey's National Electric Grid Emission Factor for the year 2021, was used. The publication includes calculated Emission Factor values that are Operating Margin (OM), Growth Based Margin (Build Margin-BM) and Combined Margin (CM) Emission Factors, for the relevant year with the usage of the IPCC's Clean Development Methodology Tool 07-V07.0. For this calculation, information regarding the data set is given below in detail;

- TEİAŞ Turkey's electricity generation-consumption and loss statistics,
- Common prepared report under Turkey's National Greenhouse Gas Inventory Reporting Format. - Common Reporting Format (CRF) tables for electricity generation (1.A.1.a.i) emission values
- Chronological order of power generation plants from TEİAŞ Load Dispatch Department with commissioning dates, plant names, fuel types, installed power values, electricity generation for the calculated year
- Checking off Volunteers from the websites of Gold Standard (GS) and Verified Carbon Standard (VCS) for the ownership status of the carbon reduction certificate and,
- From Clean Development Mechanism (CDM) Tool 009- V3.0, Power plant efficiency figures are used

According to this publication;

- Operating Margin-OM; **0.7279** tCO₂/MWh
- Build Margin-BM; **0.3541** tCO₂/MWh
- Combined Margin-CM (for solar and wind); **0.6345** tCO₂/MWh²⁵

Project emissions

²⁵

https://enerji.gov.tr//Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/TUESEmisyonFktr/Belgeler/TUESEF_Bilgi_Formu.pdf

The proposed project activity involves the generation of electricity by the development of a wind farm. The generation of electricity does not result in greenhouse gas emissions and therefore is taken as 0 tCO₂/year.

Leakage

LE_y is 0, as it is not considered according to ACM0002 (page 21) PE_y is 0 because Project is a wind power generation activity (Only for geothermal and hydro project activities, it should be considered according to ACM0002 page 14).

Then: $ER_y = BE_y$

Baseline emissions

Baseline emissions include only CO₂ emissions from electricity generation in fossil fuel fired power plants that are displaced due to the project activity, calculated as follows:

$$BE_y = (EG_y - EG_{\text{baseline}}) \times EF_{\text{grid,CM,y}} \quad (6)$$

Where:

BE_y = Baseline emissions in year y (tCO₂/yr).

EG_y = Electricity supplied by the project activity to the grid (MWh).

EG_{baseline} = Baseline electricity supplied to the grid in the case of modified or retrofit facilities (MWh). For new power plants this value is taken as zero.

EF_{grid,CM,y} = Combined margin CO₂ emission factor for grid-connected power generation in year y calculated using the latest version of the "Tool to calculate the emission factor for an electricity system". (tCO₂/MWh) (v.7.0.0).

The project activity is the installation of a new grid-connected renewable power plant

so, $EG_{\text{baseline}} = 0$

Then:

$$ER_y = BE_y = EG_y * EF_{\text{grid,CM,y}} = 294,900 \text{ MWh/year} * 0.6345 \text{ tCO}_2/\text{MWh} = 187,114 \text{ tCO}_2/\text{year}$$

The baseline scenario is identified and described in B.4. Emission reductions due to project activity will be calculated according to "Tool to calculate the emission factor for an electricity system" (Tool) version 7.0.0 as indicated in ACM0002 ver. 21.0.

A brief explanation of this methodology is given in Tool as (page 4):

This methodological tool determines the CO₂ emission factor for the displacement of electricity generated by power plants in an electricity system by calculating the "combined margin" emission factor (CM) of the electricity system.

Between 2017 and 2024, Turkey significantly expanded its renewable energy capacity, particularly in wind, solar, and hydropower.

According to official data from the Ministry of Energy and Natural Resources, the share of renewable energy in total installed capacity increased from approximately 44% in 2017 to 55% in 2024²⁶.

The government implemented supportive measures, such as feed-in tariffs and renewable energy zones (YEKA), to accelerate the deployment of renewable energy projects. These policies have successfully incentivized the private sector and increased the share of renewables in electricity generation.²⁷

As a result of this transition, the grid emission factor has shown a gradual decline, reflecting a cleaner energy mix. The annual average ERs for the project during the third crediting period (2024–2031) are calculated as 187,114 tCO_{2e}/year, using the most recent emission factor data provided by the Ministry of Energy and Natural Resources. The combined margin emission factor (CM) calculated for CP1 is 0.59384 tCO₂/MWh, the CM calculated for CP2 is 0.6482 tCO₂/MWh and the most recently calculated CM is 0.6345 tCO₂/MWh.

The increase and decrease in the emission factors compared to the previous crediting periods can be attributed to the updated OM and BM, and the inclusion of the latest renewable energy contributions to the national grid.

B.6.2 Data and parameters fixed ex ante

SDG13

Data/parameter	EF _{grid,CM,y}
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²⁶ https://enerji.gov.tr//Media/Dizin/SGB/tr/Faaliyet_Raporlari/2023/ETKB2023FR.pdf

²⁷ <https://www.resmigazete.gov.tr/eskiler/2024/10/20241005-2.htm>

Unit	tCO ₂ /MWh
Description	For the combined margin CO2 emission factor that were used to calculate estimated emission reductions, publication of Turkish Ministry of Energy and Natural Resources which is indicating Turkey's National Electric Grid Emission Factor for the year of 2021 was used.
Source of data	Please see: https://enerji.gov.tr//Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/TUESEmisyonFktr/Belgeler/TUESEF_Bilgi_Formu.pdf
Value(s) applied	0.6345
Choice of data or Measurement methods and procedures	The baseline emissions are the product of electrical energy baseline expressed in MWh of electricity produced by the renewable generating unit multiplied by an emission factor.
Purpose of data	To show CO ₂ e reduction in order to monitor the SDG 13 Indicator.
Additional comment	-

B.6.3 Ex ante estimation of SDG Impact

Calculation of the Operating Margin Emission Factor

For OM factor calculation, the Chronological order of power generation plants from TEİAŞ Load Dispatch Department with fuel types, electricity generation for the calculated year were used as input data. By using all of the data which were mentioned

above, the Turkish Ministry of Energy and Natural Resources calculated $EF_{grid,OMsimple,y}^{28}$.
:

→

$$EF_{grid,OMsimple,y} = 0.7279 \text{ (tCO}_2\text{/MWh)}$$

Calculation of the Build Margin Emission Factor

For BM factor calculation, the Chronological order of power generation plants from TEİAŞ Load Dispatch Department with commissioning dates, plant names, fuel types, installed power values, electricity generation for the calculated year were used as input data. Consequently, the Turkish Ministry of Energy and Natural Resources calculated $EF_{grid,BM,y}^{29}$.

→

$$EF_{grid,BM,y} = 0.3541 \text{ tCO}_2\text{/MWh}$$

Calculating of the Combined Margin Emission Factor

The combined margin emission factor is calculated by using weighted average CM as per the tool formula below:

$$EF_{grid,CM,y} = EF_{grid,OM,y} * w_{OM} + EF_{grid,BM,y} * w_{BM}$$

$EF_{grid,BM,y}$ = Build margin CO₂ emission factor in year y (tCO₂/MWh)

$EF_{grid,OM,y}$ = Operating margin CO₂ emission factor in year y (tCO₂/MWh)

w_{OM} = Weighting of operating margin emissions factor (%)

w_{BM} = Weighting of build margin emissions factor (%)

According to the Tool for wind power generation project activities;

$w_{OM} = 0.75$ and $w_{BM} = 0.25$

Then:

$$EF_{grid,CM,y} = 0.7279 \text{ tCO}_2\text{/MWh} * 0.75 + 0.3541 \text{ tCO}_2\text{/MWh} * 0.25 = 0.6345 \text{ tCO}_2\text{/MWh}$$

²⁸https://enerji.gov.tr//Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/TUESEmisyonFktr/Belgeler/TUESEF_Bilgi_Formu.pdf

²⁹https://enerji.gov.tr//Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/TUESEmisyonFktr/Belgeler/TUESEF_Bilgi_Formu.pdf



$EF_{grid,CM,y} = 0.6345 \text{ tCO}_2/\text{MWh}$

Emission reductions are calculated as follows:

$$ER_y = BE_y - PE_y - LE_y \tag{5}$$

Where:

ER_y = Emission reductions in year y (t CO₂/yr).

BE_y = Baseline emissions in year y (t CO₂/yr).

PE_y = Project emissions in year y (t CO₂/yr).

LE_y = Leakage emissions in year y (t CO₂/yr).

Baseline emissions

Baseline emissions include only CO₂ emissions from electricity generation in fossil fuel-fired power plants that are displaced due to the project activity, calculated as follows:

$$BE_y = (EG_y - EG_{baseline}) \times EF_{grid,CM,y} \tag{6}$$

Where:

BE_y = Baseline emissions in year y (tCO₂/yr).

EG_y = Electricity supplied by the project activity to the grid (MWh).

$EG_{baseline}$ = Baseline electricity supplied to the grid in the case of modified or retrofit facilities (MWh). For new power plants, this value is taken as zero.

$EF_{grid,CM,y}$ = Combined margin CO₂ emission factor for grid-connected power generation in year y calculated using the latest version of the "Tool to calculate the emission factor for an electricity system". (tCO₂/MWh) (v.7.0.0).

Leakage

LE_y is 0, as it is not considered according to ACM0002 (page 21) PE_y is 0 because Project is a wind power generation activity (Only for geothermal and hydro project activities, it should be considered according to ACM0002 page 14).

Then: $ER_y = BE_y$

Emission Reduction

The project activity is the installation of a new grid-connected renewable power plant

so, $EG_{baseline} = 0$

Then:

$$ER_y = BE_y = EG_y * EF_{grid,CM,y} = 294,900 \text{ MWh/year} * 0.6345 \text{ tCO}_2/\text{MWh} = 187,114 \text{ tCO}_2/\text{year}$$

SDG 7 Affordable and Clean Energy:

The project is expected to generate 294,900 MWh/annually.

SDG 8 Decent Work and Economic Growth:

The project provides at least 22 employment.

B.6.4 Summary of ex ante estimates of each SDG Impact

SDG 13 Climate Action

The Project’s third crediting period is between 09/04/2024 – 08/04/2031.

CO2 Emissions

YEAR	BASELINE ESTIMATE	PROJECT ESTIMATE	NET BENEFIT
09/04/2024 – 31/12/2024	136,875	0	136,875
2025	187,114	0	187,114
2026	187,114	0	187,114
2027	187,114	0	187,114
2028	187,114	0	187,114
2029	187,114	0	187,114
2030	187,114	0	187,114
01/01/2031 – 08/04/2031	50,239	0	50,239
Total number of crediting years		7	

YEAR	BASELINE ESTIMATE	PROJECT ESTIMATE	NET BENEFIT
Annual average over the crediting period	187,114	0	187,114

SDG 7 Affordable and Clean Energy

The baseline for the Project is no project, thus leading to generation in the relevant grid dominated by fossil fuel. The clean energy generated by the Project is calculated based on the amount of electricity generated by the Project per annum.

The Project is expected to generate 294,900 MWh of clean energy per annum.

YEAR	BASELINE ESTIMATE	PROJECT ESTIMATE	NET BENEFIT
09/04/2024 – 31/12/2024	0	215,721	215,721
2025	0	294,900	294,900
2026	0	294,900	294,900
2027	0	294,900	294,900
2028	0	294,900	294,900
2029	0	294,900	294,900
2030	0	294,900	294,900
01/01/2031 – 08/04/2031	0	79,179	79,179
Total number of crediting years		7	
Annual average over the crediting period	0	294,900	294,900

SDG 8 Decent Work and Economic Growth

The Project will lead to employment opportunities that would not have been possible in the baseline scenario. The Project provides local employment. Also, project activity improves the quality of employment by giving Health and safety training to the employee. Thus, a series of Health and safety training will be organised within Aliaga WFP. In the below table, it is possible to see the number of employees employed for this Project Activity. Health and Safety training will be provided annually for all employees.

YEAR	BASELINE ESTIMATE	PROJECT ESTIMATE	NET BENEFIT
09/04/2024 – 31/12/2024	0	22	22
2025	0	22	22
2026	0	22	22
2027	0	22	22
2028	0	22	22
2029	0	22	22
2030	0	22	22
01/01/2031 – 08/04/2031	0	22	22
Total number of crediting years		7	
Annual average over the crediting period	0	22	22

HSE Trainings

YEAR	BASELINE ESTIMATE	PROJECT ESTIMATE	NET BENEFIT
09/04/2024 – 31/12/2024	0	1	1
2025	0	1	1
2026	0	1	1
2027	0	1	1
2028	0	1	1
2029	0	1	1
2030	0	1	1
01/01/2031 – 08/04/2031	0	1	1
Total number of crediting years		7	
Annual average over the crediting period	0	1	1

B.7. Monitoring plan

B.7.1 Data and parameters to be monitored

SDG 13 Climate Action

Target: 13.3

Indicator: 13.3.1

SDG 13

Data / Parameter	ER_y
Unit	tons of CO ₂ e/year
Description	Baseline emissions correspond to emission reductions and are calculated as the net electricity generated by the project activity, multiplied with the combined margin CO ₂ emission factor for grid-connected power generation in year y.
Source of data	Both measured and calculated Emission reductions will be calculated considering the EPIAS records for the net electricity generated and the emission factor for the grid, 0.6345 tCO ₂ /MWh, which is calculated and published by The Ministry of Energy and Natural Resources of Turkey ³⁰ As per the monitoring plan sheet of registered CM Excel, the results shall be obtained from the Actual ER excel file during the verification.
Value(s) applied	187,114
Measurement methods and procedures	The amount of annual net electricity generation calculated by monthly settlement notifications of EPIAS based on monthly meter readings will be used to calculate estimated CO ₂ emission reduction by project activity.

30

Monitoring frequency	Annually
QA/QC procedures	Calculation of amount of emission reduction will be calculated on an excel document and provided in each monitoring period
Purpose of data	Calculation of combined margin CO2 emission factor and thus the baseline emissions-to demonstrate contribution to SDG Target 13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning
Additional comment	-

SDG 7 Affordable and Clean Energy

Target: 7.2

Indicator: 7.2.1

Data / Parameter	EG_{PJ,y}
Unit	MWh/yr
Description	Net electricity generation
Source of data	Feasibility Study & Registered PDD. (During performance certification monthly meter reading will be used as source of data).
Value(s) applied	294,900 MWh/y
Measurement methods and procedures	<ul style="list-style-type: none"> Regarding the electricity meters: four meters are placed (two main and two reserve) at the Aliaga WFP, which meters the electricity transferred to TEİAŞ substation. TEİAŞ seals these meters, and intervention by the project proponent is not possible. The fact that four meters are installed in a redundant manner keeps the uncertainty level of the only parameter for baseline calculation low. This parameter's high data quality is not only in the interest of emission reduction monitoring but paramount for the business relationship between the plant operator and the electricity buyers. <p>Measured hourly and readings monthly. Monthly settlement notifications of EPIAS consist hourly electricity production and withdrawn from the grid. EPIAŞ reading will be used as a base data on the other hand; electricity meter reading will be used to crosscheck the accuracy of the data. Authenticity will be increased</p>

by the aid of data crosschecks between EPIAŞ data and electricity meter readings. This means that the main source is the EPIAS data. TEIAS notices are used to cross-check the EPIAŞ records. TEIAS sends an electronic spreadsheet that includes daily and monthly electricity generation and withdrawn amounts for each power plant. Thus, cross-check source is the TEIAS meter readings. Since the meters are reading electricity supplied to the system and withdrawn from the system separately, the net electricity amount provided to the grid is calculated by electricity supplied minus electricity withdrawn, which is taken from monthly settlement notifications. Due to the fact that only the registered capacity’s electricity generation amount will be relevant for this new Crediting Period, the total electricity generation by the registered capacity (for 90MW) will be calculated with the help of the SCADA system. SCADA system employed in the Project Activity provides the monthly electricity generation values for each ten additional turbines. Electricity generation for registered capacity will be calculated by deducting the net electricity generation values obtained from the SCADA system for the last ten turbines from the total generation data received from the EPIAS recordings. The SCADA screenshots showing the monthly generation amount of the latest added ten turbines will be provided for monitoring. TEIAS meter readings will be used for cross-check. The above-described measurement method follows Article 81 of the official regulation "Electricity Market Balancing And Settlement Regulation."³¹

Name	Serial Number	Brand – Model	Date Of Calibration	Accuracy Class	Year of Manufacture
Main Meter (TR2) after 24/11/2019	8923685	EMH – LZQJ-XC	11/10/2019 25/07/2021 05/11/2023	0.2s	2019
Backup Meter (TR2) after 22/12/2019	8923686	EMH – LZQJ-XC	11/10/2019 25/07/2021 05/11/2023	0.2s	2019
Main meter (TR1) after 24/11/2019	8923715	EMH– LZQJ-XC	22/10/2019 25/07/2021 05/11/2023	0.2s	2019
Backup Meter (TR1) after 22/12/2019	8923684	EMH– LZQJ-XC	11/10/2019 25/07/2021 05/11/2023	0.2s	2019

³¹ See page 63,

Monitoring frequency	Continuous measurement and Monthly Recording
QA/QC procedures	<p>According to Article 2 of the Communiqué of Meters in Electricity Sector³²: 'The meters to be used in the electricity market shall be compliant with the standards of Turkish Standards Institute or IEC and have obtained "Type and System Approval" certificate from the Ministry of Trade and Industry.' Therefore, the Ministry of Trade and Industry (Ministry) is responsible for controlling and calibrating the meters. Also, according to Article 11 of this Communiqué, meters shall be in the class of 0.2s, which means the error interval for measuring is in the acceptable range according to rules.</p> <p>Annex-1 Section A of the "Electricity, Water and Gas Meters Inspection Regulation" of Ministry states that "The periodic inspection period of active electricity energy meters are done every 10 years."</p> <p>Therefore, periodic calibration of the meters will be done every 10 years.</p> <p>Also, according to Article 67 (page 20) of this regulation, the calibration shall be done in calibration stations that have been tested and approved by the Ministry of Trade and Industry. Article 10 d) of Communiqué requires the meters shall be three phases four-wire and Article 64 of Regulation clearly states how calibration shall be performed for this kind of meters.</p> <p>As above mentioned, the data acquisition and management and quality assurance procedures that are anyway in place, no additional procedures have to be established for the monitoring plan.</p>
Purpose of data	To exhibit renewable electricity generation performance of the plant
Additional comment	Plant Manager will be responsible for monitoring data.

SDG 8 Decent Work and Economic Growth

Target: 8.8

³² See, <https://www.epdk.gov.tr/Detay/DownloadDocument?id=+6B2PMv4N4A=>

Indicator: 8.8.2

Data / Parameter	Quantitative employment and income generation
Unit	-
Description	Number of local employment
Source of data	SGK (Social Security Institution) Records of the company
Value(s) applied	The company will provide job opportunities for at least 22 employee.
Measurement methods and procedures	Social Security System (SGK) records
Monitoring frequency	Each monitoring period.
QA/QC procedures	SGK records of employees are provided during each monitoring period
Purpose of data	Employment and decent work for all
Additional comment	-

SDG 8 Decent Work and Economic Growth

Target: 8.8

Indicator: 8.8.2

Data / Parameter	Quality of employment
Unit	-
Description	Quality of employment
Source of data	Health & Safety trainings
Value(s) applied	HSE trainings will be held for all employees (including local employees) at the plant. Only HSE training was provided.
Measurement methods and procedures	Training attendance list and/or certificates for HSE trainings.

Monitoring frequency	Annually (Once at the end of each monitoring period).
QA/QC procedures	Attendance records or training certificates are provided during each monitoring period. Safety measures and equipment will be shown to VVB during each verification.
Purpose of data	To exhibit employment performance of the plant
Additional comment	-

Principle 3. Community Health, Safety and Working Conditions

Data / Parameter	Livelihood of the poor
Unit	-
Description	Making various contributions to the poorest people in the vicinity of the project area
Source of data	Donation Statements by Project Proponent
Value(s) applied	The project makes contributions to the poorest people in the vicinity of the project area.
Measurement methods and procedures	Statements by PP or receipts of donations.
Monitoring frequency	Once during each MP.
QA/QC procedures	Donation records or statements will be provided once during each monitoring period. Donation records or statements will be shown to VVB during each verification.
Purpose of data	To exhibit employment performance of the plant
Additional comment	-

Principle 3. Community Health, Safety and Working Conditions

Data / Parameter	Public Health and Safety
Unit	-
Description	Taking precautions to protect public from any potential high voltage hazard

Source of data	Project Proponent
Value(s) applied	-
Measurement methods and procedures	Photographic evidences of the precautions taken
Monitoring frequency	Every Monitoring Period
QA/QC procedures	The project will safeguard public from any potential electricity related risks, the site is safeguarded and access to project site is only possible under the supervision of the security team. In addition to all the turbines are fenced and the fences are grounded to avoid any third-party injury or accident related to high voltage. Similarly, the immediate switch gear area and the main control chamber and substation is also fenced and guarded.
Purpose of data	Precautions to ensure the public health and safety
Additional comment	The project owner takes all necessary precautions in order to safeguard public from any potential electricity related risks.

Principle 9.4 - Release of pollutants

Data / Parameter	Water quality and quantity
Unit	-
Description	Disposal of wastewater
Source of data	Records of transfer of wastewater by sewage truck and statement of the wastewater treatment plant
Value(s) applied	Wastewater transfer records
Measurement methods and procedures	Wastewater generated will be collected in tanks/containers, and these waters will be transported and disposed of by the local municipality.

Monitoring frequency	At least one wastewater disposal record in one monitoring period.
QA/QC procedures	According to Waste Management Regulation, waste water disposal must be done. Records are kept by the plant.
Purpose of data	Avoidance of wastewater discharge to the environment
Additional comment	-

Principle 9.4 - Release of pollutants

Data / Parameter	Solid waste
Unit	-
Description	a) Solid household waste b) Waste oil etc. (gearbox oil waste, oil filters etc.)
Source of data	a) Garbage bins' photos b) Removal invoices.
Value(s) applied	a) Garbage bins' photos b) Removal invoices will be provided.
Measurement methods and procedures	a) Solid household waste: By visual inspection. b) Waste oil: By checking invoices.
Monitoring frequency	a) Each monitoring period b) At least one waste oil (gearbox oil waste, oil filters etc.) disposal record in a one monitoring period.
QA/QC procedures	According to Waste Management Regulation, waste water disposal must be done. Records are kept by the plant.
Purpose of data	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss.
Additional comment	-

Principle 9.4 - Release of pollutants

Data / Parameter	Noise Pollution
Unit	-

Description	Noise resulted from the turbines' rotations
Source of data	Project Owner
Value(s) applied	-
Measurement methods and procedures	Local People living in vicinity of the project site will be interviewed for the noise resulted from the turbines' rotations.
Monitoring frequency	Only Once Each Monitoring Period during this Crediting Period
QA/QC procedures	Interviews conducted with the local people
Purpose of data	To guarantee no negative impact of noise of the project activity to the habitants
Additional comment	-

Principle 9.10 High Conservation Value Areas and Critical Habitats

Data / Parameter	Biodiversity
Unit	-
Description	Bird strikes to the turbines
Source of data	Statement from appointed personnel who is constantly on the site.
Value(s) applied	Bird strikes to the turbines will be monitored.
Measurement methods and procedures	Interviews with local people will be conducted at each monitoring period. The appointed employee will complete an assessment form regarding the bird deaths around the site to record the monitoring outcome.
Monitoring frequency	Annually
QA/QC procedures	The appointed personnel of Project Proponent carry out monitoring.
Purpose of data	To prove that the project activity does not affect or alter ecosystems, critical habitats, landscapes, key biodiversity areas or sites.
Additional comment	-

B.7.2 Sampling plan

N/A

B.7.3 Other elements of monitoring plan

The Monitoring Plan for the project includes the net electricity generation by the project activity in the scope of monitoring SDG 7. The electricity generated is metered by TEİAŞ by two meters placed on the switchgear station where the plant is connected to the national grid. Those meters provide official data, which is read and recorded monthly by TEİAŞ officers and is co-signed into a protocol between the project owner and TEİAŞ. The maintenance and calibration of the meters are also done by TEİAŞ, which ensures the accuracy and quality of the measurements. In the scope of monitoring SDG 13 and SDG 7, the monthly electricity generation values will be monitored during monitoring periods. The employment records and Health and safety training provided to the employees will be monitored during the monitoring period in the scope of monitoring SDG 8.

The following shows the organisational structure for the Aliğa Wind Farm Project (Figure 8)

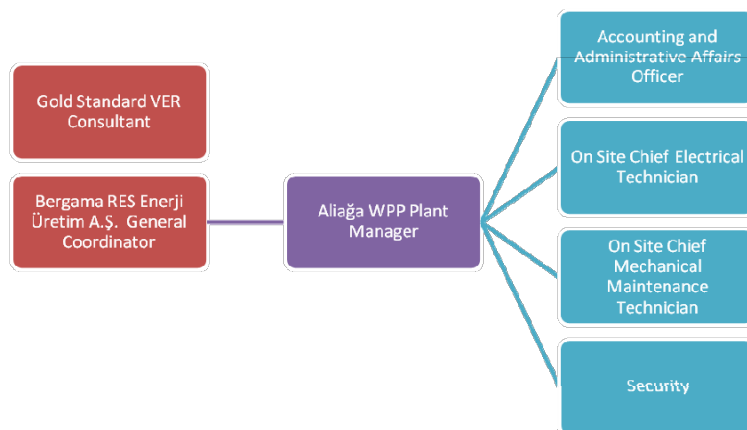


Figure 7 Organisational Structure for Aliğa WFP

The role of the staff that will be involved in the implementation of the monitoring plan is given in the following table (Table 12).

Table 9 Table indicating the role and responsibilities of the staff who will be involved in the implementation of the monitoring plan.

Who	Role
General Coordinator	Data entry in an Excel workbook. Responsible for QA/QC, including archiving. Requests calibration and maintenance certificates,
Plant Manager	Electricity meter(s) reading Attends monthly meter reading with TEIAS representative
GS VER Consultant	Prepares emission report and accompanies verification(s). Quality check of the monitoring data reported in the monitoring workbook
Grid operator	Maintenance and calibration of main and control meters. Electricity meter(s) reading.

SECTION C. DURATION AND CREDITING PERIOD

C.1. Duration of project

C.1.1 Start date of project

The project activity begins in 09/04/2010, first commissioning date.

C.1.2 Expected operational lifetime of project

The expected lifetime of the Aliaga WFP is 25 years 0 months³³.

C.2. Crediting period of project

C.2.1 Start date of crediting period

Start date of the third crediting period: 09/04/2024³⁴

³³ The operational lifetime of the Aliaga WFP is determined using the methodological Tool 10 Tool to determine the remaining lifetime of equipment. <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-10-v1.pdf>. Also, the technical brochure of the turbines used states that "the wind turbine should produce high yields over a service life of at least 20 years" (Page 17 of N90 2500 Turbine technical Specifications Brochure) which was provided to the VVB for review

³⁴ Start date of the first crediting period: 09/04/2010; End date of the first crediting period: 08/04/2017.
Start date of the second crediting period: 09/04/2017; End date of the first crediting period: 08/04/2024.

End date of the third crediting period: 08/04/2031

C.2.2 Total length of crediting period

7 years

SECTION D. SUMMARY OF SAFEGUARDING PRINCIPLES AND GENDER SENSITIVE ASSESSMENT

D.1 Safeguarding Principles that will be monitored

PRINCIPLES	MITIGATION MEASURES ADDED TO THE MONITORING PLAN
Principle 3. Community Health, Safety and Working Conditions	The project will safeguard public from any potential electricity related risks, the site is safeguarded and access to project site is only possible under the supervision of the security team. In addition to all the turbines are fenced and the fences are grounded to avoid any third-party injury or accident related to high voltage. Similarly, the immediate switch gear area and the main control chamber and substation is also fenced and guarded. Moreover, the positive contributions to the local community to increase the livelihood of the poor will be monitored. Donation records to the local activities will be provided as proof.
Principle 6.1 Labour Rights	The company will provide job opportunities to local people. SGK records of employees will be provided during each monitoring period. Moreover, health and safety training will be provided to all of the employees
Principle 9.4 Release of pollutants	Wastewater generated will be collected in septic tanks and transported to the Municipality's wastewater treatment plant. In this way, discharge of wastewater will not be allowed.
Principle 9.4 Release of pollutants	Waste oil will be vacuumed by vacuum trucks regularly. In this way, discharge of plant-sourced waste oil will not be allowed.
Principle 9.4 Release of pollutants	Garbage bins' photos will be provided for solid household waste. In this way, solid waste disposal will not be allowed.

Principle 9.4 Release of pollutants

To guarantee no negative impact of noise of the project activity to the habitants’ noise resulted from the turbines’ rotations will be monitored. Local People living in vicinity of the project site will be interviewed for the noise resulted from the turbines’ rotations once during each Monitoring Period.

Principle 9.10 High Conservation Value Areas and Critical Habitats

The Project is not located in a high conservation value area or within critical natural habitats or critical biodiversity areas or sites identified. Therefore, the project activity does not affect or alter ecosystems, critical habitats, landscapes, key biodiversity areas or sites identified. However, bird nests and carcasses on the project site will be observed by appointed personnel periodically.

D.2. Assessment that project complies with GS4GG Gender Sensitive requirements

Question 1 - Explain how the project reflects the key issues and requirements of Gender Sensitive design and implementation as outlined in the Gender Policy?

Gold Standard Gender Policy (<https://globalgoals.goldstandard.org/101-1-g-gold-standard-gender-policy/>), p. 10 "Foundational gender-sensitive requirement - This strengthens Gold Standard's 'do no harm' approach and addresses safeguards to prevent or mitigate adverse impacts on women or men and girls and boys. Such action is mandatory for all projects seeking Gold Standard certification and includes compliance with the gender 'do no harm' safeguards, gender gap analysis and gender-sensitive stakeholder consultations."

The Project is a renewable energy project and not gender-sensitive Project. The Project does not impact women or men negatively.

Question 2 - Explain how the project aligns with existing country policies, strategies and best practices

The Project does not involve and is not complicit in discrimination based on gender, race, religion, sexual orientation or any other basis. Turkey signed the convention of the International Labour Organization. The related articles are 100 and 111. The project owner respects Article 5/8425 of Labour Law; Which states no discrimination based on gender, race, religion, sexual orientation, or other basis is allowed.

Question 3 - Is an Expert required for the Gender Safeguarding Principles & Requirements?

No. The Project does not involve and is not complicit in any form of discrimination based on gender, race, religion, sexual orientation or any other basis.

Question 4 - Is an Expert required to assist with Gender issues at the Stakeholder Consultation?

No. At the Stakeholder Consultation, women are free to say anything regarding the Project. Their opinions and comments are also considered while evaluating the Project at the Stakeholder Consultation.

SECTION E. SUMMARY OF LOCAL STAKEHOLDER CONSULTATION

The below is a summary of the 2 step GS4GG Consultation for monitoring purposes. Please refer to the separate Stakeholder Consultation Report for a complete report on the initial consultation and stakeholder feedback round.

E.1 Summary of stakeholder mitigation measures

A Local Stakeholder Consultation Meeting in line with Gold Standard Requirements was held on 07 November 2008 to develop the Project as a Gold Standard VER project. The Gold Standard Organization process for VER includes two round stakeholder process. The second part of the Consultation is the Stakeholder Feedback Round held from February 2009 till April 2009. The participants were provided information about the Project's ongoing activities and let to provide their comments. The comments from the participants were positive for Aliağa WFP. During the first crediting period, general

concerns of the participants regarded the employment opportunities that project activity would enable, the radiation effect of the turbines, developments on the vegetation. The project proponent ensured that the project activity enabled more employment opportunities in the area, and the employees were selected from the local people. Regarding radiation concerns, the project proponent ensured that the project does not cause any electromagnetic radiation like a base station erected for wireless communication.

Moreover, while the project area is plain agricultural land, no distinct flora is affected by project activities. Furthermore, Project Documents and Feedback forms were enabled for the stakeholders to access from February 2009 till April 2009, and within this period, no comments were received. A grievance mechanism was established with the support of the Mukhtar for stakeholders to forward their requests or concerns regarding the project activities. In Turkey, mukhtars are the most relevant persons in the villages for establishing a grievance mechanism. Their offices are some of the few places the locals visit very often for different purposes, such as requesting some official letters. Whenever a problem arises in the village as the first thing, locals go to the mukhtars office to express their concerns, situations to find solutions and reflect on their issues with the Mukhtar. It has been decided that the Mukhtar will also take an active role in monitoring the requests of the participants so that a grievance mechanism situating the Mukhtar at the centre was established for this project activity. Mukhtar was provided all the contact information of the responsible persons from the project activity. Whenever a complaint arises from the local people or Mukhtar himself arises a concern regarding the project activity, he can directly contact the relevant responsible persons.

For the first CP renewal, no other meeting for this project was conducted apart from the remote site visit due to the travel restrictions imposed due to the COVID-19 pandemic. However, an announcement poster, which indicates that the project will continue its operation, was hung in the village where everyone could see it. Also, in the poster, local stakeholders were informed that a Continuous Input Process Book was provided to Muhtar of Atçılar village so that they could inform their complaints and feedback for 30 days regarding the project if they have. Also, on that poster, they can reach the contact information of the responsible person of the project to inform their complaints directly on the phone. During this time (input/grievance process for two

months), no feedback or complaints were reported on the Continuous Input Process Book (logbook), which was provided to Muhtar of Atçılar village³⁵.

During the online site visit conducted with VVB, the local people were interviewed, and the general outcome of the interviews was positive verbally. Opinions of the stakeholders have been taken in the online site visit, and no complaints or problems were recorded regarding the Aliağa WFP. So, no negative feedback has been received from Aliağa WFP personnel or local people regarding this Project. Moreover, when the outcome was evaluated in general, it was seen that the Project had a positive effect on the stakeholders. A stakeholder feedback round was held between 11/01/2022 and 11/03/2022. Contact information of the Project Owner was shared with the stakeholders when any negative situation arose regarding the Project Activity. Although the general outcome of the discussions with the local people was positive during the remote site visit, the Project Owner agreed to regularly follow up with the local people whether they have any problems or requests. With the Grievance Mechanism established, local stakeholders will have a chance to submit their requests and complaints to the Project Owner about the project. At the end of the SFR period, no feedback or complaints were received.

For crediting period renewal process, remote audit was held on 10/01/2024. As same with the onsite audit; although the general outcome of the discussions with the local people was positive during the remote site visit, the Project Owner agreed to regularly follow up with the local people whether they have any problems or requests. With the Grievance Mechanism established, local stakeholders will have a chance to submit their requests and complaints to the Project Owner about the project. At the end of the SFR period, no feedback or complaints were received.

E.2 Final continuous input / grievance mechanism

METHOD

INCLUDE ALL DETAILS OF CHOSEN METHOD (S) SO THAT THEY MAY BE UNDERSTOOD AND, WHERE RELEVANT, USED BY READERS.

³⁵ Logbook and the muhtar's statement regarding logbook were provided to the VVB.

- Continuous Input / Grievance Expression Process Book (mandatory)
- Continuous Input Process Book was provided to Mukhtar of Atcılar village. Mukhtar is the representative of the village and the most appropriate person to handle the book and complaints from the village.
 - All project information regarding the Project will be on the website of Life Enerji enabling stakeholders to reach and comment.
 - Other than the mukhtar, the locals can directly call or reach (go to his office) Mr Yakup Okçu regarding the problems related to the project activity. Yakup Okçu is the responsible person from the project activity who is constantly on site.

GS Contact (mandatory)

help@goldstandard.org

Other (Responsible person at the Project Site)

Yakup Okçu
E-Mail: yakup.okcu@bilgin.com.tr
Phone: +232 646 30 10

APPENDIX 1 - SAFEGUARDING PRINCIPLES ASSESSMENT

Complete the Assessment below and copy all Mitigation Measures for each Principle into [SECTION D](#) above. Please refer to the instructions in the [Guide to Completing](#) this Form.

SOCIAL SAFEGUARDING PRINCIPLES		
Reference requirement	Question	Response
P.1 HUMAN RIGHTS		
P.1.1.1 	Does the project developer, its representatives and the Project disrespect internationally proclaimed human rights?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.1.1.1 	Is the project involved or complicit in violence or human rights abuses of any kind as defined in the Universal Declaration of Human Rights?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.1.1.2 	Have local communities or individuals raised human rights concerns regarding the project (e.g., during the stakeholder engagement process, grievance processes, public statements)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.1.1.3 	Is there a risk that rights-holders (e.g., Project-affected stakeholders) do not have the capacity to claim their rights?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.1.1.3 	Does this project undermine national or regional measures for the realisation of the right to development?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<p>If the answer to any of the questions above is "yes," please explain the reason and how the project will ensure compliance with applicable requirements.</p> <p>1. Turkey is a party to Universal Declaration of Human Rights: http://ua.mfa.gov.tr/detay.aspx?2634 Turkey is a party to the Universal Declaration of Human Rights, therefore does not violate these rights and it's not a matter of discussion for Turkey. Therefore, the project developer and the project do respect nationally and internationally proclaimed human rights and is not complicit in violence or human rights abuses of any kind. The project respects internationally proclaimed human rights including dignity, cultural property.</p> <p>2 - 3. Turkey is a party to Universal Declaration of Human Rights: http://ua.mfa.gov.tr/detay.aspx?2634 Therefore, the project will not discriminate with regards to participation and inclusion.</p>		
<p>Would the project potentially involve or lead to:</p>		
P.1.1.1 	adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalised groups?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

P.1.1.2 	inequitable or discriminatory impacts on affected populations, particularly people living in poverty or marginalised or excluded individuals or groups, including persons with disabilities?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.1.1.3 	restrictions in availability, quality of and/or access to resources or basic services, in particular to marginalised individuals or groups, including persons with disabilities?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.1.1.3 	exacerbation of conflicts among and/or the risk of violence to project-affected communities and individuals?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

Briefly describe below how the project incorporates a human rights-based approach.

For example, by describing how the project design:

- is informed by human rights analysis, including from UN human rights mechanisms (human rights treaty bodies, universal periodic review, special procedures)
- includes measures to assist the government to realise (respect, protect and fulfil) human rights under international law and to implement human rights-related standards in national law (whichever is higher)
- enhances the availability, accessibility and quality of benefits and services for potentially marginalised individuals and groups, and to increase their inclusion in decision-making processes that may impact them (consistent with the non-discrimination and equality human rights principle)
- provides reasonable accommodations to strengthen inclusivity and accessibility of project benefits and services to persons with disabilities.

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P.2 | GENDER EQUALITY AND WOMEN’S EMPOWERMENT

P.2.1.1 	Have women’s groups/leaders raised gender equality concerns regarding the project, (e.g., during the stakeholder engagement process, grievance processes, public statements)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.2.1.2 	Does the project undermine the principles of non-discrimination, equal treatment, and equal pay for equal work?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.2.1.2 	Does the project prevent men and women from having equal opportunities to participate in identified tasks and activities, whether through paid work, volunteer work, or community contributions, as appropriate?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.2.1.2 	Does the project limit the participation of women or men based on pregnancy, maternity/paternity leave, or marital status?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.2.1.2 	Is information about project objectives being communicated in a way that is inappropriate for the local context and not tailored to the methods of understanding of both women and men, which could hinder their participation?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

P.2.1.3	Has the project assessed gender risks without referencing the country's gender strategy or equivalent national commitment?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.2.1.4	Has expert stakeholder(s) been involved, and has their input been requested for the project design on gender equality and women's empowerment?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain the reason and how the project will ensure compliance with applicable requirements.

1. The project does not adversely affect men and women in marginalized or vulnerable communities because it creates stable jobs and incomes for local men and women. The project does not reduce or put at risk women's access to or control of resources, entitlements and benefits because the project owner comply with the Labor Code. In the main office of the project owner company there are women employees as well. Therefore, Project contributes to recognition of women rights implicitly. Turkey is also party to Convention on Discrimination since 1967 to prevent any form of discrimination; <http://ua.mfa.gov.tr/files.ashx?872>

2. The project owner complies with regulations of Turkey's law. Therefore, the project will not discriminate with regards to participation. Men and women are paid equally for work of equal value.

3. Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment <http://www.ilo.org/ankara/areas-of-work/equality-discrimination/lang--tr/index.htm>

Would the project potentially involve or lead to:

P.2.1.1	adverse impacts on gender equality and/or the situation of women and girls?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.2.1.1	exacerbation of risks of gender-based violence? For example, through the influx of workers to a community, changes in community and household power dynamics, increased exposure to unsafe public places and/or transport, etc.	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.2.1.2	reproducing discriminations against women based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.2.1.2	limitations on women's ability to use, develop and protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services? For example, activities that could lead to natural resources degradation or depletion in communities who depend on these resources for their livelihoods and well-being.	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

Briefly describe below how the project is addressing any identified risk to gender equality and women's empowerment.

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P.3 | COMMUNITY HEALTH AND SAFETY

P.3.1.1 	Does the project involve potential risks to the health and safety of affected communities during its life cycle?	<input type="checkbox"/> YES <input type="checkbox"/> NO
P.3.1.2 	Does the project involve any potential risks to the workers' safety and health?	<input type="checkbox"/> YES <input type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain the reason and how the project will ensure compliance with applicable requirements.

1. The project leads to safe working condition and improvement in health as it will replace coal as fuel with wind which is clean and safe. Further, periodic Health and safety trainings are being implemented for all employees to ensure prevention of any unsafe working condition. Turkey has ratified ILO convention 155 and about work safety and precautions https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/WCMS_356966/lang--en/index.htm.

Would the project potentially involve or lead to:

P.3.1.1 	construction and/or infrastructure development (e.g., roads, buildings, dams)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.3.1.2 	air pollution, noise, vibration, traffic, injuries, physical hazards, poor surface water quality due to runoff, erosion, sanitation?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.3.1.2 	harm or losses due to failure of structural elements of the project (e.g., collapse of buildings or infrastructure)?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.3.1.2 	risks of water-borne or other vector-borne diseases (e.g., temporary breeding habitats), communicable and noncommunicable diseases, nutritional disorders, mental health?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.3.1.2 	transport, storage, and use and/or disposal of hazardous or dangerous materials (e.g., explosives, fuel and other chemicals during construction and operation)?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.3.1.2 	adverse impacts on ecosystems and ecosystem services relevant to communities' health (e.g., food, surface water purification, natural buffers from flooding)?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

Briefly describe below how the project is addressing any identified risk related to community health and safety.

1. Health and Safety trainings are provided for all employees regularly.

P.4 | CULTURAL HERITAGE, INDIGENOUS PEOPLE, DISPLACEMENT AND RESETTLEMENT

[P.4.1 | Sites of Cultural and Historical Heritage](#)

P.4.1.1 	Does the project involve altering, damaging, or removing sites, objects, or structures of significant cultural heritage?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain the reason and how the project will ensure compliance with applicable requirements.

According to the approved exemption of environmental impact assessment, the project area does not include sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture.

Would the project potentially involve or lead to:

P.4.1.1 	activities adjacent to or within a cultural heritage site?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.1.1 	significant excavations, demolitions, movement of earth, flooding or other environmental changes?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.1.1 	alterations to landscapes and natural features with cultural significance?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.1.1 	adverse impacts to sites, structures, or objects with historical, cultural, artistic, traditional or religious values or intangible forms of culture (e.g., knowledge, innovations, practices)? (Note: projects intended to protect and conserve Cultural Heritage may also have inadvertent adverse impacts)	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.1.2 	utilisation of tangible and/or intangible forms (e.g., practices, traditional knowledge) of Cultural Heritage for commercial or other purposes?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.1.2 	If answer to question above is "YES" or "POTENTIALLY" - are the communities made aware of their right under the law, scope and nature of proposed development and its potential consequences?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.1.3 	If answer to question above is "YES" - does the project provide equitable sharing of benefits from commercialisation of such knowledge, innovation, or practice, consistent with their customs and traditions?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.1.4 	If answer to question above is "YES" - are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.1.4 	If answer to question above is "YES", has project design been changed, modified, updated considering opinions and recommendations of an Expert Stakeholder?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.4.2 | Forced Eviction and Displacement](#)

P.4.2.1	Does the project involve any risks related to involuntary relocation of people?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain the reason and how the project will ensure compliance with applicable requirements.

For the project activity, no resettlement is required.

Would the project potentially involve or lead to:

P.4.2.1	risk of forced evictions or involuntary relocation of people?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
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P.4.2.2	temporary or permanent and full or partial physical displacement (including people without legally recognisable claims to land)?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
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P.4.2.2	economic displacement (e.g., loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
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P.4.2.2	If answer to question above is "YES" or "POTENTIALLY", <ul style="list-style-type: none"> - has the project developed Resettlement Action Plan or Livelihood Action Plan in consultation and agreement with affected individual, group or community? - has the project integrated Resettlement Action Plan or Livelihood Action Plan into the Project design? 	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
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P.4.2.3	If answer to question above is "YES" - are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
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P.4.2.3	If answer to question above is "YES", have project design been changed, modified, updated considering opinions and recommendations of an Expert Stakeholder?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
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If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A

P.4.3 | LAND TENURE AND OTHER RIGHTS

P.4.3.1	Does the project involve any risks related to identifying and managing legitimate tenure rights that may be affected by the project?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain the reason and how the project will ensure compliance with applicable requirements.

There is no need for expropriation. Land acquisition was done according to the Turkish Expropriation Laws and Regulations.

Would the project potentially involve or lead to:

P.4.3.1 	impacts on or changes to land tenure arrangements and/or community-based property rights/customary rights to land, territories and/or resources?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.3.1 	uncertainties with regards to land tenure, access rights, usage rights or land ownership? Examples include, but are not limited to water access rights, community-based property rights and customary rights.	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.3.2 	Changes in legal arrangements, if yes, are the changes done in line with relevant laws and regulations?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.3.2 	Changes in legal arrangements, if yes, are these changes agree with free, prior and informed consent of the involved stakeholders?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.3.3 	Does some other entity (other than the project developer) hold uncontested land title for the entire Project Boundary?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.3.4 	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.3.4 	If answer to question above is "YES", have project design been changed, modified, updated considering opinions and recommendations of an Expert Stakeholder?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.3.5 	Have project developer in consultation with stakeholders established a functioning mechanism to receive, process, resolve, communicate and record grievances?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.4.4 | INDIGENOUS PEOPLES](#)

P.4.4.1 	Does the project involve Indigenous People within the Project area of influence who may be affected directly or indirectly by the Project?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

N/A.

Would the project potentially involve or lead to:

P.4.4.1 	affect areas where indigenous peoples are present (including project area of influence)	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.4.1 	affect areas, land and territory claimed by indigenous peoples?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY

		<input checked="" type="checkbox"/> NO
P.4.4.1	impacts (positive or negative) to the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.4.7	If answer to above questions is "YES" or "POTENTIALLY", <ul style="list-style-type: none"> - Is it determined that the proposed project may affect the rights, lands, resources, or territories of indigenous people? - Has an "Indigenous People Plan" (IPP) or "Indigenous People Plan Framework" been elaborated and included in the project documentation? - Was the plan developed in accordance with the effective and meaningful participation of indigenous peoples and in accordance with UNDP Guidelines? 	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.4.3	risk of forcibly removing indigenous people from their lands and territories?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.4.4	utilisation and/or commercial development of natural resources on lands and territories claimed by indigenous peoples? Consider, and where appropriate ensure, consistency with the answers under Principle 4.1 above	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.4.4.5 P.4.4.6	If answer to question above is "YES" or "POTENTIALLY" <ul style="list-style-type: none"> - Did the project obtain free, prior and informed consent from indigenous people before taking their cultural, intellectual, religious, and/or spiritual property? - Does the project ensure that the indigenous people receive an equitable sharing of benefits resulting from the use of their traditional knowledge and practices? ? - Does the project ensure that the sharing of benefits resulting from the use of indigenous peoples' traditional knowledge and practices is culturally appropriate and inclusive? - Does the project ensure that the provision of equitable sharing of benefits does not impede land rights or equal access to basic services including health services, clean water, energy, education, safe and decent working conditions, and housing? 	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

P.4.4.8	Does the project lack appropriate feedback and grievance channels for Indigenous Peoples and their representatives?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.4.8	Has a grievance mechanism not been established at the beginning of programme or project implementation with due consideration given to customary dispute settlement mechanisms among the Indigenous Peoples concerned and will it remain operational throughout the project cycle?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.4.9	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.4.4.9	If answer to question above is "YES", have project design been changed, modified, updated considering opinions and recommendations of an Expert Stakeholder?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

P.5 | CORRUPTION

P.5.1.1	Does the project involve, or is it complicit in, contributing to or reinforcing corruption or corrupt projects?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
P.5.1.1	Does the project have a risk of encouraging bribery, kickbacks, or other unethical behavior?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project does not involve any kind of corruption.

Turkey is a party to United Nation Convention against Corruption since 2006;

<http://ua.mfa.gov.tr/detay.aspx?15042>

Moreover, Turkey has ratified several conventions on bribery and corruption including OECD and UN conventions

<http://www.masak.gov.tr/en/LaunderingProceedsofCrime/Chronology.htm> .

The Project owner has not any negative track record related to corruption or any such activity whatsoever.

ECONOMIC SAFEGUARDING PRINCIPLES

P.6 | ECONOMIC IMPACTS

P.6.1 | LABOUR RIGHTS AND WORKING CONDITIONS

P.6.1.1	Does the project involve, facilitate, or condone forced labor, or pose a potential risk of forced labor?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.1	Does the project violate any labor or health and safety laws, international obligations, or ILO conventions?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

P.6.1.2 	Does the project violate the principles of equal opportunity and fair treatment in its employment decisions?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.3 	Does the project violate national laws, if available regarding non-discrimination in employment?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.4 P.6.1.5 	Does the project allow child labor?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.7 P.6.1.8 	Does the project have insufficient processes and measures in place to ensure the safety and health of project workers?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.9 	Does the project have insufficient measures to safeguard and support vulnerable project workers, such as women, people with disabilities, migrant workers, and young workers, and to prevent any kind of harassment, abuse, bullying, or exploitation, including gender-based violence (GBV)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.10 	Does the project have no grievance mechanism available for workers to voice workplace concerns? Is information about this mechanism not provided to workers at the time of recruitment, or is it not easily accessible?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

Project owner protects labours rights of all employees within this company. Workers might have occupational accidents during construction and operation phase. According to project developer, during construction and operational phase of the project "Health and Occupational Safety Regulation" will be followed. Regulation could be found under this link too:

<http://www.mevzuat.gov.tr/MevzuatMetin/1.5.6331.pdf>

1. Turkey has ratified ILO 87 and 98 conventions. All employee are recruited according to the national legislations. Turkey is a party of IPEC (<http://www.ilo.org/ipec/programme/lang--en/index.htm> and <http://www.ilo.org/ipec/Regionsandcountries/lang--en/index.htm>) since 1992 and ratified ILO convention 138 and 182 (<http://www.ilo.org/public/turkish/region/eurpro/ankara/about/sozlesmeler.htm>). Turkey has ratified ILO convention 155 and about work safety and precautions.

2. In accordance with the Labour Code of Turkey, workers should have the right to establish and join the organization that they consider necessary.

3. The project owner follows regulations of Labour Code of Turkey. All employee are provided with labour contracts, medical insurance and regular health-check as well as social insurance and unemployment insurance.

4. Trained technicians are involved in construction and operation and maintenance of plants. Therefore, no child labour is involved.

5. Necessary health and safety measures will be taken during operation phase according the regulation of health and safety requirements in construction Works (<http://www.resmigazete.gov.tr/eskiler/2013/10/20131005-2.htm>). Additionally, relevant staff will be trained to be able to work with high voltages, high heights and heavy machineries.

Would the project potentially involve or lead to: (NOTE: APPLIES TO BOTH PROJECT AND CONTRACTOR WORKERS)		
P.6.1.1 	use of forced labour?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.1 	working conditions that do not meet national labour laws and international commitments?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.1 	working conditions that may deny freedom of association and collective bargaining?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.1 	absence of documented working agreements with all individual workers <i>if such agreements do not exist, or do not address working conditions and terms of employment, the project developer shall provide reasonable working conditions and terms of employment.</i>	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.1 	use of migrant workers? <i>if engaged, the developer shall ensure that they are engaged substantially equivalent terms and conditions to non-migrant workers carrying out similar work.</i>	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.1 	having no arrangements for basic services ³⁶ for workers? <i>the project developer shall put in place and implement policies on the quality and management of the accommodation and provision of basic services in a manner consistent with the principles of non-discrimination and equal opportunity. Workers' accommodation arrangements should not restrict workers' freedom of movement or of association</i>	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.2 	any form of discrimination or harassment based on factors unrelated to job requirements, such as gender, race, nationality, ethnicity, social or indigenous origin, religion or belief, disability, age, or sexual orientation?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.2 	any form of discrimination in any aspect of employment, such as recruitment, compensation, working conditions, training, job assignment, promotion, termination, or discipline?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

³⁶ Basic services requirements refer to minimum space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, noise, fire, and disease-carrying animals, adequate sanitary and washing facilities, ventilation, cooking and storage facilities and natural and artificial lighting, and in some cases basic medical services.

P.6.1.2 	harassment, intimidation, and/or exploitation, especially in regard to women?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.3 	discriminatory working conditions and/or lack of equal opportunity where national law provides provision to address non-discrimination in employment?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.4 	use of child labour? (including third-party engaged workers)	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.1.4 	inadequate and verifiable mechanisms for age verification?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.7 	no processes and measures in place for the safety and health of project workers?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.7 	No provision of safety and health training provisions, including on the proper use and maintenance of personal protective equipment conducted by competent persons and the maintenance of training records?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.7 	No provision to record and document accidents, diseases, incidents, and any resulting injuries, illnesses, or deaths?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.8 	occupational health and safety risks due to physical, chemical, biological and psychosocial hazards (including violence and harassment) throughout the project life-cycle?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.9 	No measures to protect vulnerable project workers from harassment, exploitation, and gender-based violence (GBV)? This includes women, people with disabilities, migrant workers, and young workers.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.10 	No grievance mechanism available for workers to voice workplace concerns.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.1.11 	No measures for due diligence and the establishment of policies and procedures to manage and monitor the performance of third-party employees in the project?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

P.6.2 | NEGATIVE ECONOMIC CONSEQUENCES

P.6.2.1 	Is there a risk of project failure during implementation or after project certification due to a lack of financial resources?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.6.2.2 	Does the project have potential negative impacts or pose a risk to the local economy?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

P.6.2.2 	Are there any potential risks or negative impacts this project may have on vulnerable or marginalised social groups, despite the benefits it may bring?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The project activity involves electricity generation from local and renewable sources. Since Turkey is dependent on import fuel (mainly natural gas and coal), project will not generate any risk but contribute to local economy. Project Activity provides job opportunities for local people. By this way, it contributes improvement of economy.

Would the project involve or lead to:

P.6.2.2 	economic impacts (negative/detrimental) to the local economy?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.6.2.2 	negative economic consequences during and after project implementation, e.g., for vulnerable and marginalised social groups in targeted communities?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.7 | CLIMATE AND ENERGY](#)

[P.7.1 | GHG EMISSIONS](#)

P.7.1.1 	Does the project have a risk of increasing greenhouse gas emissions over the Baseline Scenario?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project will reduce the emission of 187,114 tCO_{2e}/year compared to the Baseline Scenario as it replaces electricity generated from fossil fuel fired power plants with zero emissions electricity from the wind power plant. On the contrary, it helps to reduce GHG emissions by producing green energy.

Would the project involve or lead to:

P.7.1.1 	increase greenhouse gas emissions over the Baseline Scenario?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
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If the answer is "yes" or "potentially" to the above question, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.7.2 | ENERGY SUPPLY](#)

P.7.2.1 	Does the project pose a risk to the availability and reliability of energy supply to other users?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project's purpose is to supply clean energy from the wind power plant to the national grid. Plant sometimes can use energy from local grid in the absence of wind. However, this amount is really small when compared to its production of green energy amount.

Would the project involve or lead to:

P.7.2.1 	negative impact on the availability and reliability of energy supply to other users?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
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If the answer is "yes" or "potentially" to the above question, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

P.8 | WATER

P.8.1 | IMPACT ON NATURAL WATER PATTERNS/FLOWS

P.8.1.1 	Does the project increase water usage to a level that will not allow for the maintenance of environmental flows?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.8.1.1 	Does the project result in the discharge of wastewater that does not meet the required standard for beneficial reuse and could therefore negatively impact the environmental flow?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.8.1.1 	Does the project have the potential risk to exceed the rate of recharge for the groundwater source?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.8.1.1 	Does the project involve any processes or activities that could contaminate the groundwater and render it unsuitable for use?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

According to the PIF, there is no aqua production and protected aquifers close to the plant. No lakes or streams are found in the vicinity of the project area.

Would the project involve or lead to:

P.8.1.1 	affect the natural or pre-existing pattern of watercourses, groundwater and/or the watershed(s) such as high seasonal flow variability, flooding potential, lack of aquatic connectivity or water scarcity?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.8.1.1 	Wastewater discharge of quality that does not meet the required standard for beneficial reuse?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.8.1.1 	significant extraction, diversion of ground water? For example, construction of dams, reservoirs, river basin developments, groundwater extraction	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

P.8.1.2	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
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If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

P.8.2 | EROSION AND/OR WATER BODY INSTABILITY

P.8.2.1	Does the project have a risk of negatively impacting the catchment and has it been assessed and addressed?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project is being implemented in a proper way (by considering the concerns indicated via the entire principle 4.2.2 Erosion and/or Water Body Instability): There is no interruption to the hydrological systems in a WPP.

Would the project involve or lead to:

P.8.2.2	negatively impact on the catchment area?	
P.8.2.5	<p><i>If yes, Erosion prevention measures, including soil and slope protection measures, must be implemented before project commencement. These measures should involve natural terracing, infiltration strips, permanent ground cover, hedge and tree rows, and effective slope length assessment. Regular reassessment of these measures is necessary.</i></p>	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.8.2.6	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

P.9 | ENVIRONMENT, ECOLOGY AND LAND USE

P.9.1 | LANDSCAPE MODIFICATION AND SOIL

P.9.1.1	Is there any risk of soil resource degradation or loss of ecosystem services provided by soils in the project?	
P.9.1.3	<p><i>If yes, the project shall maintain healthy soils by minimising negative impacts on soil health, productivity, structure, and water retention. Steps to minimise soil degradation include crop rotation, composting, using N-fixing plants, and reducing tillage and ecologically harmful substances.</i></p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project is being implemented in a proper way (by considering the concerns indicated via the entire principle Landscape Modification and Soil): Only potential impact to soil would be observed due to construction activities of the Project, and these negligible impacts are not permanent. Furthermore, there is an access road to the project area so that there is no problem in accessing the area. The necessary attention to be paid to the speed limits of the trucks and the material inside the trucks will be covered. Trucks to be loaded in line with the axle load and will not be overloaded, the top 10% of the material to be moisturised.

Would the project involve or lead to:

P.9.1.4 	production, harvesting, and/or management of living natural resources by small-scale landholders and/or local communities?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.1.4 	if answer to above question "yes" or "potentially", does project adopt appropriate and culturally sensitive sustainable resource management practices?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.9.2 | VULNERABILITY TO NATURAL DISASTER](#)

P.9.2.1 	Does the project have any risks associated with natural or man-made hazards that could result from land use changes due to the project?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project is being implemented in a proper way (by considering the concerns indicated via the entire principle Vulnerability to Natural Disaster): The project area is not a place to specific extreme climatic conditions and harmful natural events such as earthquake.

Would the project involve or lead to:

P.9.2.2 	any potential risks that require emergency preparedness and response planning?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.2.2 	if answer to above question "yes" or "potentially", did the project developer disclose appropriate information about emergency preparedness and response to affected communities?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.9.3 | BIOSAFETY AND GENETIC RESOURCES](#)

P.9.3.1 	Does the project involve the transfer, handling, and use of genetically modified organisms/living modified organisms that may result in adverse effects on biological diversity?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project is being implemented in a proper way (by considering the concerns indicated via the entire principle 4.3.3 Genetic Resources): There is no relevance to GMO of a Wind Power Plant.

Would the project involve or lead to:

P.9.3.1 	the transfer, handling and use of genetically modified organisms/living modified organisms (GMOs/LMOs) that result from modern biotechnology	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.3.1 	If answer to above question is "yes" has a risk assessment by a competent Expert stakeholder been carried out in accordance with Annex iii of the Cartagena protocol on biosafety to the convention on biological diversity?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.3.2 	If answer to above question is "yes" has any risks identified in the risk assessment?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.3.3 	Forestry (for example Afforestation/Reforestation) involving GMO planting? <i>Note - Forestry projects (for example Afforestation/Reforestation) involving GMO planting are not eligible for Certification under Gold Standard for the Global Goals.</i>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.9.4 | RELEASE OF POLLUTANTS](#)

P.9.4.1 	Does the project have a risk of releasing pollutants to air, water, and land in routine, non-routine, or accidental circumstances?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

During this Crediting Period the Project Activity will produce domestic waste due to employee but it will be collected appropriately. Also, waste oil will be generated due to operation of the wind turbines and they will also be collected and disposed following related regulations and precautions defined by the laws and the Municipality. Moreover, wastewater generated by the employee use will be collected and disposed appropriately following relevant regulations.

According to PIF, nearest settlement (Seklik Village) is 1 km away from the project site. Distance-noise calculation for construction period of the project activity shows that the noise level for this length is 40.59 dBA, which is below minimum legal limit values i.e. 50 dBA for night and 60 dBA for daylight. The noise level from turbines during operation is low and under legal limits. Therefore, no negative impact of noise of the project activity to the habitants is expected during operation period. The same is valid for shadow flickering effect.

Since the nearest residential house is 600m away from the closest turbine there is no shadow flickering effect.

Would the project involve or lead to:

P.9.4.1	any potential risk of pollutant release that cannot be avoided?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.4.3	If answer to above question is "Yes" or "potentially", has the project identified all potential pollution sources that may degrade the quality of soil, air, surface, and groundwater in the project area?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.4.2	If answer to above question is "Yes" or "potentially", do the pollution prevention and control technologies and practices applied during the project life cycle align with national regulations or international best practices?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.4.3	If answer to above question is "Yes", is there a monitoring plan to ensure that mitigation measures are implemented, and resources are protected?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

Wastewater produced will be collected in an impermeable septic tank and will be periodically transferred to treatment plant. This process will be handled according to the Regulation of Ministry of Environment and Forestry.

Waste oil will be vacuumed by vacuum truck regularly. By this way, discharge of plant sourced waste oil will not be allowed.

Following PIF, all waste generated by the workers and machines will be collected in separate closed bins (plastic, metals etc.) and then they will be collected by Seklik Municipality. Non recyclable wastes will be collected in impermeable closed bins. Garbage bins' photos will be provided for solid household waste. By this way, solid waste disposal will not be allowed.

P.9.5 | HAZARDOUS AND NON-HAZARDOUS WASTE

P.9.5.1	Does the project involve the generation of waste materials (both hazardous and non-hazardous)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.5.3	Does the project involve risk of release of hazardous materials resulting from their production, transportation, handling, storage, or use?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.5.5	Does the project involve the use of any chemicals or materials subject to international bans or phase-outs?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The proposed Project activity is a renewable energy project and doesn't involve any hazardous chemicals & other materials. The host party has its credible legislation "Health and Occupational Safety Regulation". Regulation could be found under this link too: <http://www.resmigazete.gov.tr/eskiler/2012/06/20120630-1.htm>

Hazardous waste including lubricant, grease, light bulb, accumulator, etc. may release during the maintenance process of equipment; and Non-hazardous waste including domestic solid waste and domestic waste water are generated from worker's activities.

Would the project involve or lead to:

P.9.5.1	the generation and management of waste materials?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.5.1	treatment, destruction, or disposal of waste material?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
P.9.5.1	If answer to above question is "Yes", does the project involve an environmentally friendly method that includes appropriate control of emissions and residues resulting from the handling and processing of waste material?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.5.3	risk of release of hazardous materials resulting from their production, transportation, handling, storage, or use?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
P.9.5.3	If answer to above question is "yes", does project has measures in place to address health risks?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> NA
P.9.5.4	Involve manufacture, trade, and use of chemicals and hazardous materials subject to international bans or phase-outs due to their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

The following mitigation measures will be applied to the project activity.

Hazardous wastes are collected and treated by the third authorized party in accordance with local laws and related regulations;

Non-hazardous wastes are collected and treated in accordance with local laws and related regulations.

All relevant legal building codes will be applied appropriately.

[P.9.6 | PESTICIDES & FERTILISERS](#)

P.9.6.1	Does the project involve the use of chemical pesticides?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.6.5	Does the project involve purchase, store, manufacture, trade or use products that fall in Classes IA (extremely hazardous) and IB (highly hazardous)	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.6.6	Does the project use fertilisers, and if so, are measures being taken to minimise their use and nutrient losses to the environment?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project's purpose is to supply clean energy from the wind power plant to the national grid. Therefore the Project does not involve the application of pesticides and/or fertilizers.

Would the project involve or lead to:

P.9.6.1 	chemical pesticides use for pest management?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.6.4 	If answer to question above is "yes" or "potentially", does project has documented Chemical Pesticides Policy in place?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.6.5 	purchase, store, use, manufacture, or trade in Class II (moderately hazardous) pesticides?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.6.5 	If answer to question above is "yes" or "potentially", does project has appropriate controls on manufacture, procurement, or distribution and/or use of these chemicals?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.9.7 | HARVESTING OF FORESTS](#)

P.9.7.1 	Does the project have a risk of unsustainable forest management, including timber harvesting?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.7.1 	Does the project pose a risk of depleting biodiversity and ecosystem functionality in areas where improved forest management is undertaken?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.7.1 	Does the project risk not meeting requirements for environment-friendly, socially beneficial, and economically viable plantations using native species whenever possible?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project is being implemented in a proper way (by considering the concerns indicated via the entire principle 4.3.7 Harvesting of Forests): There has not been a significant forestation during the construction phase (i.e. project has been approved as EIA positive) and the Project does not involve an operation that requires forest harvesting.

[P.9.8 | FOOD SECURITY](#)

P.9.8.1 	Does the project involve the risk of negatively influencing access to and availability of food for people affected?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to the question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project is being implemented in a proper way (by considering the concerns indicated via the entire principle 4.3.8 Food): The Project does not modify the quantity or nutritional

quality of food available such as through crop regime alteration or export or economic incentives.

Would the project involve or lead to:

P.9.8.1	modification of the quantity or nutritional quality of food available such as through crop regime alteration or export or economic incentives?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
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If the answer is "yes" or "potentially" to the above question, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

P.9.9 | ANIMAL WELFARE

P.9.9.1	Does the project involve any risks to animal welfare? Animal welfare shall be ensured by providing access to water and food, appropriate environment, humane treatment, and staff training. Evidence of mistreatment will be treated as an immediate non-conformity.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.9.2	Does the project involve any potential risk of excessive or inadequate use of veterinary medicines?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.9.4	Does the project involve the risk of administering synthetic growth promoters, including hormones?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

The Project is being implemented in a proper way (by considering the concerns indicated via the entire principle 4.3.9 Animal husbandry): The Project does not involve any operation that disrupt husbandry and agriculture in the region.

Would the project involve or lead to:

P.9.9.1	animal husbandry or harvesting of fish populations or other aquatic species? ³⁷	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.9.1	limiting access for animals to basic needs like drinking water, adequate food, daylight, appropriate shelter etc.?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.9.3	inadequate measures to isolate sick animals and control the spread of disease, especially zoonotic diseases?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.9.5	inadequate low-stress methods, equipment, and facilities that facilitate calm animal movement.	<input type="checkbox"/> YES <input type="checkbox"/> NO

³⁷ 'Involve' means if the project mechanism and/or impact(s) are achieved via changing animal husbandry practices in some way.

		<input checked="" type="checkbox"/> NA
P.9.9.6 	inadequate measures to ensure that animals are exposed to the least stress possible during transportation and slaughtering?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.9.7 	inappropriate spacing per animal and stocking rates per land unit?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.9.8 	inadequate measures to address the specific needs of aquatic animals?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.9.9 P.9.9.10 	primary production of living natural resources such as animal husbandry, aquaculture, and fisheries? If the answer is yes, implement industry-standard sustainable management practices in line with to one or more relevant and credible standards and utilise available technologies.	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above question, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.9.10 | HIGH CONSERVATION VALUE AREAS AND CRITICAL HABITATS](#)

P.9.10.1 	Does the project have the risk of negatively impacting HCV areas and/or critical habitats?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
P.9.10.2 	Does the project in the project area or area of downstream impacts have risks to the following: native tree patches, individual native trees, freshwater resources (including rivers, lakes, swamps, temporary water bodies, and wells), habitats of rare, threatened, and endangered species, and biodiversity-enhancing areas?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

There is no endangered flora or fauna in the region. The project site has no protection status in terms of National Park, Land Fence, Protection of Cultural and Natural Assets and similar laws. The project is not located in an area within a high conservation value area or within critical natural habitats or key biodiversity areas or site identified. Therefore, the project activity does not affect or alter ecosystems, critical habitats, landscapes, key biodiversity areas or sites identified.

The project area is not on the migration path of birds therefore the effect on birds by the project activity is negligible. However, proper mitigation measures will be applied to the project activity including: painting over turbine with white color and installation of warning lights.

Would the project involve or lead to:

P.9.10.1 	identified habitats as HCV areas and or Critical habitats?	<input type="checkbox"/> YES
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		<input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.10.1	If answer to above question is "yes", does the project have any risks that could negatively impact the catchment, project success, and surrounding HCV and ecological assets, as well as any measurable adverse impacts on the criteria or biodiversity values for which the critical habitat was designated, and on the ecological processes supporting that biodiversity?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA
P.9.10.1	If answer to above question is "yes", is a robust, appropriately designed, and long-term Habitats and Biodiversity Action Plan absent which will make the project unable to achieve net gains of those biodiversity values for which the critical habitat was designated?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
P.9.10.2	Does the project area or area of downstream impacts have native tree patches, individual native trees, freshwater resources (including rivers, lakes, swamps, temporary water bodies, and wells), habitats of rare, threatened, and endangered species, and biodiversity-enhancing areas?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.10.2	If the answer to the above question is "yes", will the project have any adverse effects on these areas?	<input type="checkbox"/> YES <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
P.9.10.3	If the answer to above question is "yes", does the project has opportunities to minimise unwarranted conversion or degradation of the habitat and to enhance the habitat as part of its development?	<input type="checkbox"/> YES <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
P.9.10.4	Is the project applying Land Use & Forest Activity Requirements and managing a minimum 10% of the project area to protect or enhance the biological diversity of native ecosystems following HCV approach as per the given requirements?	<input type="checkbox"/> YES <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
P.9.10.5	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above question, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.9.11 | ENDANGERED SPECIES](#)

P.9.11.1	Does the project lead to the reduction or negative impact on any recognised Endangered, Vulnerable or Critically Endangered species?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

1. According to the PIF, the project area is not in natural protection zone. There are no endangered species identified as potentially being present the project Boundary.

2. According to PIF and also the bird routes map of Doga Dernegi (an environmental NGO in Turkey), the project is not on the route of migration birds. The project doesn't affect adversely the migration of birds.

Would the project involve or lead to:

P.9.11.2 	distortion of habitats of endangered species?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NA
P.9.11.2 	If answer to the above question is "yes", does the project plan to protect and enhance them?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
P.9.11.2 	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NA

If the answer is "yes" or "potentially" to any of the above question, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

[P.9.12 | INVASIVE ALIEN SPECIES](#)

P.9.12.1 	Does project introduce any alien species (not currently established in the country or region of the project) into new environments?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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If the answer to question above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

N/A.

Would the project involve or lead to:

P.9.12.1 	risk of introducing any alien species with a high risk of invasive behaviour regardless of whether such introductions are permitted under the existing regulatory framework?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.12.1 	risk of potential accidental or unintended introductions including the transportation of substrates and vectors (such as soil, ballast, and plant materials) that may harbour alien species.	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO
P.9.12.2 	risk of spreading alien species into areas in which they have not already been established?	<input type="checkbox"/> YES <input type="checkbox"/> POTENTIALLY <input checked="" type="checkbox"/> NO

If the answer is "yes" or "potentially" to any of the above question, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

N/A.

APPENDIX 2 - CONTACT INFORMATION OF PROJECT DEVELOPER(S)

Organization name	Bergama RES Enerji Üretim A.Ş.
Registration number with relevant authority	
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Last name	Akdağ Gökağaçlı
Middle name	
First name	Baharsu
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APPENDIX 4 - DESIGN CHANGES

Please refer to Design Change [Requirements](#) for more information on procedures governing Design Changes

Revision History

Version	Date	Remarks
1.5	29 June 2023	Editorial changes to match V2.1 of the Safeguarding Principles Requirements
1.4	21 June 2023	Editorial changes to match V2.0 of the Safeguarding Principles Requirements
1.3	14 April 2023	Integrated the design change memo as annex of the document. Editorial changes
1.2	14 October 2020	Hyperlinked section summary to enable quick access to key sections Improved clarity on Key Project Information Inclusion criteria table added Gender sensitive requirements added Prior consideration (1 yr rule) and Ongoing Financial Need added Safeguard Principles Assessment as annex and a new section to include applicable safeguards for clarity Improved Clarity on SDG contribution/SDG Impact term used throughout Clarity on Stakeholder Consultation information required Provision of an accompanying Guide to help the user understand detailed rules and requirements
1.1	24 August 2017	Updated to include section A.8 on 'gender sensitive' requirements
1.0	10 July 2017	Initial adoption