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FM 4.9 Gold Standard Sustainability
Verification Report Template

September 2020

GOLD STANDARD SUSTAINABILITY VERIFICATION REPORT

FOR

CEMEL HYDRO BUNDLE

GOLD STANDARD REGISTRY ID: 1208

BY

HGG ENERJI ÜRETİM SAN. VE TİC. A.Ş.

METHODOLOGY: ACM0002 (VERSION 12.3)

MONITORING PERIOD: 01/06/2019 TO 31/07/2021 (FIRST AND LAST DAY INCLUDED)

REPORT NO: CCIPL1017/GS/VER-RCP/CHB/20211008

REVISION NUMBER: 04

REPORT DATE: 16/12/2021

CARBON CHECK (INDIA) PRIVATE LIMITED

CIN: U74930DL2012PTC232495

Regd. Off: 2071/38, 2nd Floor, Nai Wala, Karol Bagh, New Delhi - 110005

Corporate off: Unit No. 1701, Logix City Centre Office Tower, Plot No. BW-58, Sector-32 Noida, Uttar Pradesh

Tel: +91 120 4373114 | URL: www.carboncheck.co.in | e-mail: info@carboncheck.co.in



I. PROJECT DATA

Project activity title:	Cemel Hydro Bundle		
GS Registration No.	GS 1208	Scale:	Large
Monitoring period:	01/06/2019 – 31/07/2021 (Inclusive of both the days)	Monitoring Period Number:	3
Methodology:	ACM0002 Version 12.3	Sectoral Scope/Technical Area:	01/1.2
Publication of MR:	N/A		
Final Monitoring Report:	Monitoring report (version 4, dated 14/12/2021).		
Average emission reductions:	Estimated:	86,680 tCO ₂ e	Verified: 69,162 tCO ₂ e
GHG reducing measure/technology:	GHG reduction by using renewable energy source (hydro) and supplies electricity to the grid through displacement of electricity that would be provided to the grid by more-GHG-intensive means i.e., by thermal power plants.		
Party	Project participants	Party considered a project participant	Contract party
Turkey (Host)	HGG Enerji Üretim San. Ve Tic. A.Ş (private entity)	Yes	☒

II. VERIFICATION TEAM

Verification Team			Role									
Full name	Affiliation	Appointed for Sectoral Scopes (Technical Areas)	Team leader	Acting/trainee Team Leader	Local Expert	Team Member (Auditor)	Technical Expert	Acting/Trainee Tech. Expert	Trainee Auditor	Technical Reviewer	Expert to TR	Trainee TR
Dinesh Mane	India		X				X					
Muhammet Ali ERDURAN	Turkey				X							
Indumathi C.	India									X		

III. VERIFICATION REPORT

Status	Verification Phases
☒	Desk Review
☒	On Site Assessment
☒	Follow up interviews
☒	Corrective Actions / Clarifications Requested
☒	Resolution of outstanding issues
☒	Full Approval and Submission for Issuance

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Rejected

Status	Distribution Conditions
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Final Approval	
Date	21-12-2021
Approved by	Amit Anand
Designation	Chief Executive officer
Signature	

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Abbreviations

BAU	Business As Usual
CA	Corrective Action / Clarification Action
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
CAR	Corrective Action Request
CC IPL	Carbon Check (India) Private Ltd.
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
CL	Clarification Request
CO ₂	Carbon Dioxide
CO _{2e}	Carbon Dioxide Equivalent
DOE	Designated Operational Entities
DVR	Draft Validation Report
EB	CDM Executive Board
ETN	Electricity Transaction Note
EF	Emission Factor
FA	Final Approval
FAR	Forward Action Request
FVR	Final validation Report
GS	Gold Standard
GHG	Greenhouse gas(es)
GWh	Giga Watt Hour
HEPP	Hydro Electric Power Plant
IPCC	Intergovernmental Panel on Climate Change
MP	Monitoring Plan
MEDAŞ	Meram Elektrik Dağıtım A.Ş.
MWh	Mega Watt Hour
MRR	Monthly Reading Records
OSV	On Site Visit
PA	Project Activity
QC/QA	Quality control/Quality assurance
RMP	Revised Monitoring Plan
TA	Technical Area
TR	Technical Review
UNFCCC	United Nations Framework Convention on Climate Change

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VVS
VVB

Validation and Verification Standard
Validation/Verification Body

Verification Opinion — Summary

Carbon Check (India) Private Ltd. has performed the 3rd periodic verification of the GS registered Project activity “Cemel Hydro Bundle” GS reference number GS 1208, registration date 01/10/2013 and date of Transition Approval is 24/04/2020.

The monitoring period under assessment is from 01/06/2019 – 31/07/2021 (inclusive of both days). The verification team assigned by the VVB concludes that the GS Project Activity as described in the GS PDD (version 10, dated 04/11/2019) /B01/, GS4GG Transition Annex /B04/ and monitoring report (version 4, 14/12/2021) /01/, meets all relevant requirements of the Gold Standard for Global Goals. The verification has been conducted in-line with the requirements of CDM VVS PA (version 03.0) /B05/ and GS4GG principles & requirements version 1.2, GS4GG safeguarding principles & requirements version 1.2, GS4GG Stakeholder-Consultation requirements version 1.2 /B09/ and other relevant requirements as applicable.

Verification methodology and process

The Verification team confirms the contractual relationship signed on 11/10/2021 between the VVB, Carbon Check (India) Private Ltd. and the Project Participant, HGG Enerji Üretim San. Ve Tic. A.Ş. The team assigned to the verification meets the Carbon Check (India) Private Ltd. internal procedures including the UNFCCC and GS4GG requirements for the team composition and competence. CC IPL has conducted a thorough contract review as per UNFCCC, GS4GG and Carbon Check procedures and requirements.

The verification has been performed as per the requirements described in the Gold Standard for the Global Goals Principles & Requirements (version 1.2) and CDM VVS for PA (version 03.0) /B01/ and constitutes the review and completion of the following steps:

- Reviewing the revised registered PDD /B02/ (version 10, dated 04/11/2019), the monitoring plan and the corresponding validation report and the Gold Standard Passport, the Sustainability Matrix and monitoring data, GS4GG transition Annex AA;
- Desk review of the MR /01/, previous verification reports and other relevant documents including documents related to the project activities in emission reductions.
- Review of the applied monitoring methodology ACM0002 “Consolidated baseline methodology for grid connected electricity generation from renewable sources”, Ver 12.3.0 /B06/
- Review of any CMP and EB decisions, clarifications, and guidance from the Gold Standard.
- Remote interview (26/11/2021)
- Issuance of Draft Verification Report (27/11/2021)
- Resolution of CARs and CLs raised during verification.
- Confirmation that any FARs raised during validation or previous verification have been addressed by the Project Participant.
- Issuance of Verification Report.

In Carbon Check’s opinion the project activity has been implemented in accordance with the monitoring methodology /B06/, monitoring plan /B02/ as contained in the registered PDD /B01/, /B02/. Based on document review and remote interviews, the verification team confirms that the project has resulted in 69,162 tCO_{2e} of net emission reductions during the reported monitoring period. The GHG parameters and non-GHG parameters were correctly calculated/monitored on the basis of the applied approved monitoring methodology /B06/ and as per the registered GS passport /B08/ and GS4GG Transition Annex respectively/B04/.

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Carbon Check as the VVB is therefore pleased to issue a positive verification opinion expressed in the attached Certification statement and certify the net emission reductions of 69,162 tonnes of CO₂ equivalent from the PA “Cemel Hydro Bundle” during the above stated monitoring period.

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1. INTRODUCTION

HGG Enerji Üretim San. Ve Tic. A.Ş has appointed Carbon Check (India) Private Ltd. to perform an independent verification of the GS PA “Cemel Hydro Bundle” (hereafter referred to as “project activity”). This report summarises the findings of the verification of the project, performed on the basis of GS4GG principles & requirements version 1.2, GS4GG safeguarding principles & requirements version 1.2, GS4GG Stakeholder-Consultation-Requirement’s version 1.2, and paragraph 62 of the CDM M & P, as well as criteria given to provide for consistent project operations, monitoring and reporting and the subsequent decisions by the CDM Executive Board and Gold Standard Secretariat. Verification is required for all registered GS PA intending to confirm their achieved emission reductions and proceed with request for issuance of GS-VERs. This report contains the findings and resolutions from the verification and a certification statement for the verified emission reductions.

1.1 Objective

Verification is the periodic independent review and ex post determination of both quantitative and qualitative information by VVB the monitored reductions in GHG emissions that have occurred as a result of the registered GS PA during a defined monitoring period.

Certification is the written assurance by a VVB that, during a specific period in time, a project activity achieved the emission reductions as verified. Hence, this will be issued only after the successful closure of CARs and CLs.

The objective of this verification was to verify and certify emission reductions reported for the PA under the GS-PA “Cemel Hydro Bundle” in country “Turkey” for the monitoring period 01/06/2019 to 31/07/2021 (both days inclusive).

The purpose of verification is to review the monitoring results and verify that the monitoring methodology was implemented according to the monitoring plan and monitoring data and used to confirm the reductions in anthropogenic emissions by sources, is sufficient, definitive, and presented in a concise and transparent manner. Other non-GHG parameters shall also be assessed as per the requirement of GS. Verification of emission reductions for Gold Standard crediting is only for eligible gases.

In particular the monitoring plan, monitoring report and the project’s compliance with relevant GS4GG/UNFCCC and host Party criteria are verified in order to confirm that the project has been implemented in accordance with the previously registered project design and conservative assumptions, as documented. And also, to confirm that monitoring plan follows the registered Large-Scale PA /B01/ and approved monitoring methodology.

1.2 Scope

The scope of the verification is:

- To verify the project implementation and operation with respect to the registered PDD /B02/ and GS4GG transition Annex /B04/
- To verify the implemented monitoring plan with the registered PDD /B02/ and GS4GG transition Annex /B04/ and applied baseline and monitoring methodology /B06/.
- To verify that the actual monitoring systems and procedures follow, the monitoring systems and procedures described in the monitoring plan.
- To evaluate the GHG emission reduction data /02/ and express a conclusion with a reasonable level of assurance about whether the reported GHG emission reduction data is free from material misstatement.

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- To verify that reported GHG emission data and other non-GHG parameters as per the requirement of GS is sufficiently supported by evidence.

Carbon Check's scope of verification as a third-party verifier is to verify project emission reductions and sustainable development impacts against the requirements set out by the Gold Standard. The verification shall ensure that the reported emission reductions are complete and accurate in order to be certified.

The verification comprises a review of the Monitoring report over the monitoring period (01/06/2019 to 31/07/2021) (both days inclusive) and based on the registered PDD in part of the monitoring parameters and monitoring plan, emission reduction calculation spread sheet, monitoring methodology and all related evidence provided by project participant.

Remote interview (Local Expert onsite) and stakeholders' interviews are also performed as part of the verification process.

1.3 Project Activity Description

HGG Enerji Üretim San. Ve Tic. A.Ş. has installed and commissioned a 21.6 MWm/20.4 MWe run-of-river hydropower plant on Kızılırmak River within the boundaries of Avanos District of Nevşehir city in Turkey. Project got registered in name of PP as per registered PDD was "Zeynep Enerji Üretim San. Ve Tic. A.Ş." which was collaboration of two entities named HGG and ERT, after that the shares of ERT purchased by HGG completely and the complete ownership of project activity comes under "HGG Enerji Üretim San. Ve Tic. A.Ş.". The EMRA Electricity production license is also in name of "HGG Enerji Üretim San. Ve Tic. A.Ş.". The same is confirmed with PP during onsite visit interview and document review. This bundled project is composed of 6.567 MWe Cemel I HEPP, 7.055 MWe Cemel II HEPP and 6 MWe Cemel III HEPP on the mid-section of Kızılırmak River basin and the generated electricity through the project transferred to the national grid via Avanos Substation.

The net electricity generation has been checked from the Joint metering records. The projected cost of NG that for electricity generation is 1.0871 TL/Sm³. Therefore, the total payment avoided for natural gas import by the project is € 57,39,959 during the monitoring period in line with the provided and checked calculation in ER sheet /02/.

The crediting period start date of the project as verified from the initial and second Verification Report and project's GS registry link is 03/07/2015 with choice of renewable crediting period.

The estimated emission reductions during this monitoring period are 69,162 tons CO_{2e} /2/.

The verification team confirms that the project is in line with the plans contained in the registered revised GS PDD /B01/, /B02/.

2. METHODOLOGY

The verification consists of the following four phases:

1. Completeness check of the Emission Reductions /02/, GS4GG Monitoring report/01/ and Gold Standard Sustainability Monitoring Report, and Project Administration System.
2. Review of project documentation (monitoring plan, monitoring report, monitoring methodology, project design document, applicable tools in particular attention to the frequency of measurements, QA/QC procedures and other relevant documents and regulations).
3. Remote interview (including follow-up interviews with project stakeholders, when deemed necessary) includes the following.
 - An assessment of implementation and operation of project activity with respect to registered PDD/B01/ or approved revised PDD /B02/.

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- Review of information flows for generating, aggregating and reporting the monitoring parameters.
 - Interview with relevant personals to determine whether the operations and data collection procedures are implemented and in accordance with monitoring plan of the PDD /B01/;
 - Cross check of information and data provided in the monitoring report with actual monitoring. Also, checking the consistency of the information reported as per physical implementations.
 - Check of monitoring equipment's, calibration frequency and monitoring practice in-line with methodology and PDD /B06/, /B02/.
 - Review of assumptions made in calculating the emission reductions.
 - Implementation of QA/QC procedure in-line with the PDD/B02/ and methodology requirement /B06/.
4. Resolution of outstanding issues and the issuance of the final Verification report and Certification statement.

The following sections outline each step in more detail.

Duration of Verification:

- Signing of Letter of Engagement: 11/10/2021
- Remote interview: 26/11/2021
- Reporting/Calculations/Quality and Control checks: 07/12/2021

2.1 Desk review

The following table outlines the documentation reviewed during the verification:

No.	Title
/01/	• Monitoring Report Ver 1 dated 06/10/2021 • Monitoring Report Ver 4 dated 14/12/2021
/02/	Emission reduction calculation spread sheet
/03/	Technical specifications/photographs of turbines, generators, electricity meters etc. as provided in registered PD
/04/	Power purchase Agreement with TEIAS
/05/	Single line diagram for the flow of electricity from generation point to feed in grid including meter locations
/06/	Project site photographs
/07/	Electricity production license dated 13/08/2013
/08/	Commissioning document (Provisional Acceptance Letter) of Cemel I, II, III
/09/	Calibration Certificates and meter test report for main meter and check/backup meter
/10/	3rd Monitoring Period Electricity generation data from TEIAS – EPIAS web site
/11/	Proof of location of the weirs, powerhouse, turbines
/12/	Proof of Meters information (Manufacture, Calibration date, Validation, Accuracy class)
/13/	Invoices raised by PP to TEIAS
/14/	Proof of Area of the reservoir measured i.e., Surface area determined using the lake from topographical maps in KML file
/15/	TEIAS meter Calibration guidelines showing calibration frequency of 10 years
/16/	Communiqué for Metering Devices
/17/	Proof of installed capacity of the Project Activity i.e., showing in SCADA system
/18/	Valid Meters "Type and System Approval" certificate from the Ministry of Trade and Industry in compliance with TS-620 EN 60044-1 and TS718 IEC60044
/19/	The ICE/TSE 62053-22: Electricity metering equipment (a.c) – Particular requirements - Part 22: Static meters for active energy (Classes 0.2 S and 0.5 S)
/20/	Fish Passage Design Expert Report
/21/	Proof of occupational trainings and occupational health trainings provided in Current Monitoring period dated 05.12.2019 & 06.12.2019

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/22/	Proof Metering records readings mentioned in ER sheet (Gross and Self) for current monitoring period
/23/	Hazardous Waste Disposal Declaration Form
/24/	A sewage truck record on 24/02/2020
/25/	Proof of Company Name Change
/26/	Transition Documents including PDD Ver 10
/27/	Annual Report -CEMEL-HYDRO-BUNDLE-T-PerfCert_V1.1-Annual-Report- 6102021
/28/	Social Security Records for PP Site Employees
/29/	Proof of maintenance of planted areas during monitoring period
/30/	Payrolls and annual expenditures provided during this monitoring period
/31/	Proof of 28 people are employed in this monitoring period among which 18 of them are locals

2.2 Background documents

Ref no.	Reference Document
/B01/	Registered PDD Ver 8 and corresponding validation Report
/B02/	Revised PDD Ver 10 dated 04/11/2019
/B03/	Documents pertaining to 2 nd Verification - Monitoring Report - Verification Report
/B04/	GS Transition-Annex- v 3.0
/B05/	CDM VVS for PA (version 03.0) CDM PS for PA (version 03.0) CDM PCP for PA (version 03.0)
/B06/	Applied baseline and monitoring methodology, "ACM0002 "Consolidated baseline methodology for grid connected electricity generation from renewable sources", Ver 12.3.0"
/B07/	Instructions for filling out the Gold standard for the global goals - Monitoring report (version 1.1)
/B08/	GS Passport
/B09/	GS4GG Principles & requirements version 1.2 GS4GG Safeguarding principles & requirements version 1.2 GS4GG Stakeholder-Consultation requirements version 1.2 GS4GG Gender-Equality-Requirements-Guidelines version 1.1

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2.3 Remote and follow-up interviews with project stakeholders

A.1. On-site inspection

On-site inspection has been conducted by Local Expert of team and other Team members attended site visit remotely for the verification of the PA.

Justification for not conducting on-site inspection :

Carbon Check audit team members have not conducted an on-site inspection, which is in conformity with CDM Executive Board's recommendation to avoid site visit due to COVID-19 outbreak (https://cdm.unfccc.int/newsroom/latestnews/releases/2020/01041_index.html) and COVID-19 Interim Measures (<https://globalgoals.goldstandard.org/ru-2020-covid-19-interim-measures-update/>).

The on-site inspection can-not be postponed due to timeline agreed between the Project Participant and the VVB.

Regarding GS4GG requirements and in the view of current situations where travel restrictions have been put in place for domestic as well as international travel around the world due to COVID-19 pandemic, the VVB has decided to conduct the verification remotely (without physical on-site inspection) for the project in accordance with the provisions of paragraph 4.1.1. (b) of Rule Update: COVID 19: Interim Measures, which states:

"If site visit cannot be postponed due to significant impact of delaying the site visit on VVB and/or project developer due to timeline/commitment as per validation/verification or GS-VERs delivery agreement, VVB may replace mandatory on-site visits with remote audits. The audit may include but not limited to validation, verification, design change review etc."

Remote interview was performed by the verification team of Carbon Check on 26/11/2021 and the following activities were performed:

- i. An assessment of the implementation and operation of the registered GS PA as per the registered PDD /B01/ and the respective revised PDD /B02/.
- ii. A review of information flows for generating, aggregating, and reporting the monitoring parameters.
- iii. Interviews with relevant personnel to determine whether the operational and data collection procedures are implemented in accordance with the monitoring plan in the PDD/B01/ and the revised PDD/B02/;
- iv. A cross check between information provided in the monitoring report /01/ and data from other sources such as purchase records /04/, or similar data sources.
- v. A check of the monitoring equipment including calibration performance and observations of monitoring practices against the requirements of the PDD/B01/ and the selected methodology /B06/ and corresponding tool(s), where applicable.
- vi. A review of calculations and assumptions made in determining the GHG data and emission reductions/02/
- vii. An identification of quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters.



The project representatives and stakeholders interviewed through available onsite local expert: 26/11/2021.

Sl. No.	Name (Organisation)	Date	Type	Topic
/i/	Mr. Murat Muftuoglu (Project Manager- HGG)	26/11/2021	☒ On-site LE ☐ Face to Face ☐ Telephone ☐ E-mail ☒ Google Meet ☒ Remotely	• PA implementation, • Monitoring Report, • GHG and non-GHG parameters, • PA Operation, • Compliance of monitoring plan with monitoring methodology, registered PDD • Discussion the achievement of the sustainability monitored parameters mention in MR including SDG goals • Safeguarding principles • Stakeholder consultation feedback provided in Monitoring Report • No Net harm
/ii/	Ms. Merve Aygenc (Project Carbon Consultant- GTE)	26/11/2021	☒ On-site LE ☐ Face to Face ☐ Telephone ☐ E-mail ☒ Google Meet ☒ Remotely	• ER calculation • MR Completeness • Document review
/iii/	Mr. Ali Riza (Local Farmer)	26/11/2021	☒ On-site LE ☐ Face to Face ☐ Telephone ☐ E-mail ☒ Google Meet ☒ Remotely	• Discussion the achievement of the sustainability monitored parameters mention in MR including SDG goals • Safe guarding principles • Stakeholder consultation feedback provided in Monitoring Report • No Net harm
/iv/	Mr. Erdal Bey (Technician-TEIAS Transformer Centre)	26/11/2021	☒ On-site LE ☐ Face to Face ☐ Telephone ☐ E-mail ☐ Google Meet ☒ Remotely	• Calibration requirements of Energy meters • Energy meters accuracy class and other details

Through the above-mentioned activities, the verification team confirmed the following Gold Standard project aspects in relation to the project activity:

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- The implementation and operation of the project activity is as described in the monitoring plan in the registered PDD /B01/.
- The operational and data collection procedures are implemented as per the monitoring plan in the PDD /B01/, /B02/.
- The information flow for generating, grouping and reporting of the monitored parameters.
- Procedures to avoid double counting are in place.

A.2. Sampling approach

No sampling approach is used.

2.4 Resolution of outstanding issues

The objective of this phase of the verification is to resolve any outstanding issues (issues that require further elaboration, research, or expansion) which have to be clarified/corrective action done prior to final GS VVB's conclusions on the project implementation, monitoring practices and achieved emission reductions. In order to ensure transparency a verification protocol is completed for the project activity. The protocol shows in transparent manner criteria (requirements), means of verification and resulting statements on verification actual project activity against identified criteria.

The verification protocol serves the following purposes:

- It organises in a table form, details, and clarifies the requirements, a GS project is expected to meet GS4GG requirements.
- It ensures a transparent verification process where the GS VVB will document how a particular requirement has been verified and the result of the verification.
- It ensures that the issues are accurately identified, formulated, discussed and concluded in the validation report.
- It ensures the determination of achieving credible emission reductions from the project activity.

The verification protocol consists of two tables. Table 1 reflects the verification requirements and reference to the materials used to verify the project activity against those requirements, as well as means of verification, reference to Table 2 (i.e., tables of findings) and preliminary and final opinion of the GS VVB on every particular requirement listed in table 1.

Verification Protocol Table 1: Requirement checklist

Checklist question	Verification Team Comment/MoV	Reference	Findings comments references, data source / Draft Conclusion	Final Conclusion
The checklist items in Table 1 are linked to the various requirements the project should meet. The checklist is organised in various sections. Each section is then further subdivided as per the requirements of the topic and the individual project activity.	The section is used to elaborate and discuss the checklist item in detail. It includes the assessment of the Verification team and how the assessment was carried out. The reporting requirements of the VVS and Project Standard shall be covered in this section.	Gives reference to the information source on which the assessment is based on	Assessment based on evidence provided if the criterion is fulfilled (OK), or a CAR, CL or FAR is raised (see below). The assessment refers to the draft verification stage.	In case a corrective action or a clarification request the final assessment at the final verification stage is given.

The findings of verification process are summarized in the tables below.

CAR/ CL/ FAR ID	XX	Section no.	Date: DD/MM/YYYY
Description of CAR/ CL/ FAR			
PP response			Date: DD/MM/YYYY
Documentation provided by the PP			
GS VVB assessment			Date: DD/MM/YYYY

Corrective action requests (CARs) are raised, in case:

- Non-conformities with the monitoring plan or methodology are found in monitoring and reporting and has not been sufficiently documented by the project participants, or if the evidence provided to prove conformity is insufficient;
- Modifications to the implementation, operation and monitoring of the registered project activity has not been sufficiently documented by the project participants;
- Mistakes have been made in applying assumptions, data or calculations of emission reductions which will impair the estimate of emission reductions;
- Issues identified in a FAR during validation/previous verification(s) that are not been resolved by the project participant(s) to be verified during current verification.

Requests for clarification (CLs) are raised if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met.

A forward action request (FAR) is raised during verification to highlight issues related to project implementation/monitoring that require review during the subsequent verification of the project activity. FARs shall not relate to the CDM requirements for issuance.

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Tel: +91 120 4373114 | **URL:** www.carboncheck.co.in | **e-mail:** info@carboncheck.co.in

2.5 Internal quality control

The final verification report has passed a technical review before being submitted to the project participant(s) and GS4GG Certification Team / Board. The technical review is performed by a technical reviewer qualified in accordance with CCIPL's qualification scheme for GS4GG validation and verification.

2.6 Verification Team

Carbon Check has appointed a competent team as per the Accreditation Standard and Carbon Check's internal procedures, the team is outlined below:

Verification Team			Type of Involvement							
Full name	Location	Appointed for Sectoral Scopes (Technical Areas)	Supervising the work	Desk review	Remote Interview	Report and protocol Writing	Technical Expert Input	Reporting Support	Technical Reviewer	Technical Expert Input to TR
Dinesh Mane	India		X	X	X	X	X			
Muhammet Ali ERDURAN	Turkey			X						
Indumathi C.	India								X	

Dinesh Mane: He is an appointed Team Leader and Technical Expert for technical area 1.2 and 13.1. He is local expert also for He is having more than 18 years of experience, which involves experience in the environmental services industry. Certification Bodies, Chemical Industries, Project management and technical skills in areas viz., Environment, Energy, Occupational Health and Safety, GHG offset projects Validation and Verification, ISO Audits (IMS) Renewable Energy and waste management. He worked in various capacities at TUV Rhineland India Pvt. Ltd.

Indumathi C.: Qualified lead assessor and internal technical reviewer for offset projects validations and verifications under CDM, VCS and Gold Standard (GS) and actively been involved in the validation and verification or internal technical review of more than 250 GHG offset projects. She is qualified as technical expert for TA 1.1, 1.2, 3.1, 13.1 and 13.2 under CDM SS categorisation. She has undergone extensive training in the validation and verification of carbon offset projects. Currently, she is employed with Carbon Check in the capacity of Technical Reviewer.

Muhammet Ali Erduran: He is a local expert for Turkey and speaks English and Turkish.



3. VERIFICATION FINDINGS

The findings of the verification are described in the following sections. The verification criteria (requirements), the means of verification and the results of verification are documented in detail below.

3.1 Project implementation

The implementation of the project activity

Project Participants:	HGG Enerji Üretim San. Ve Tic. A.Ş
Title of PA:	Cemel Hydro Bundle
GS registration No:	GS 1208
Applied Baseline and monitoring methodology:	ACM0002 Version 12.3 /B03/
Project Scale:	Large scale
Location of the project activity:	Turkey
Project's crediting period:	03/07/2015 to 30/06/2022, (7 years, renewable)
Reported monitoring Period verified in this verification:	01/06/2019 to 31/07/2021 both days inclusive

Project physical features (technology, project equipment, monitoring and metering equipment)

Project activity is the operation of 20.4 MWe run-of-the-river hydroelectric power plant in the Nevşehir Province in Turkey. Nearest location to the project site is Aladdin village of Avanos which is about 2 km away from the project site. Project site is accessible from main road following a 3 km route to Cemel I, 8.5 km to Cemel II and 5.5 km to Cemel III. This bundled project is composed of 6.567 Mwe Cemel I HEPP, 7.055 MWe Cemel II HEPP and 6.4 MWe Cemel III HEPP on the midsection of Kızılırmak River basin. The project activity involves electricity generation using potential energy of the Kızılırmak Stream by means of 2 turbines of each unit and supply of this the generated electricity to the Turkish National Electricity Grid. The project displaces the electricity produced by fossil fuel-based power plants, by using clean renewable source to generate electricity and thereby contributes to sustainable development through reduction in greenhouse gas (GHG) emissions. During LE site visit and remote interview It's confirmed that the project has been implemented in accordance with the description provided in the PDD and MR. It has not been any changed or modified on the project content and details. Approved License by EMRA /07/ also shared to CCIPL authority by PP. The Manager of the Cemel Hydro Power Plant also showed the Units of the field and HPP via Video Calling during remote site visit and at actual to local expert.

During remote interview it has been confirmed from Chief Project Manager of the Hydro Power Plant (HPP), that the electricity produced by HPPs is transmitted to TEİAŞ Transmission lines. The Substation belongs to TEİAŞ. The meters of the power plants are located in the HPPs. The meters are read by TEİAŞ with the Remote Reading System OSOS and reported to the EPIAŞ institution. The SCADA system of Cemel Power Plants can be controlled from the Monitoring Room. Transformer of 5 MVA capacity installed in each Cemel unit in Cemel

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	Hydro Power Plant field to step up Power Generation from 6.3 V to 34.5 kV. The project proponent for the project activity is HGG Enerji Üretim San. Ve Tic. A.Ş. , owns the rights to VERs. However, earlier PP name was Zeynep Enerji Üretim San. Ve Tic. A.Ş. as per registered PDD. The name change of PP is informed by PP to GS through Annual Report /25/ and the documents for the same is also verified during verification /27/. Hence it is concluded that the current PP is HGG Enerji Üretim San. Ve Tic. A.Ş. The project activity ER start date is 03/07/2015 /08/. The same was confirmed through verification carried out by verifier during 1st and 2nd monitoring period verification report also.	
Findings	–	
Any Project Design Change been sought and approved by EB for the project?	☐ Yes ☒ No	No change sought

Carbon Check's verification team considers the project description of the project contained in the registered PDD and revised PDD /B01/,/B02/ to be complete and accurate. The PDD and revised PDD /B01/,/B02/ complies with the relevant methodology /B03/, tools, forms, and guidance at the time of submission for registration.

Verification team reviewed the ER spread sheet /01/ and found that Total emission reduction achieved in whole monitoring period (01/06/2019 - 31/07/2021): 69,162 tCO₂.

Also as part of the remote (Local expert onsite) site visit, the verification team was able to confirm that the project implementation is in accordance with the project description contained in the registered PDD and revised PDD/B01/, /B02/.

3.2 The actual operation of the Gold Standard Project activity

The Start date of project activity is stated as 13/07/2011 in the PDD, which is the date of construction subcontractor agreement. The net generation of electricity in this monitoring period is 127,842 MWh /10/.

The project activity is in operation stage as evidenced by the remote inspection (google meet video inspection and onsite visit by local expert) of the site. All the physical components and project boundary are in conformity with the description in registered PDD, and validation report /B01/. The capacity of project equipment's has been confirmed during the remote inspection (through review of installed capacity by SCADA System /17/), also through the technical specifications, electricity generation license /07/, commissioning certificate /08/ and found in-line with the registered GS PDD /B02/.

On the basis of the remote inspection and local expert onsite visit and the review of technical specifications, Single line diagram and meter location /05/, Electricity production license /07/, Provisional acceptance letter, calibration certificates for meters project documentation /08/, invoices /13/, organization structure and Electricity generation data /08/ , the verification team confirms that the project was implemented and operated as described in the registered PDD /B01/ .

Carbon Check's verification team confirms that the project activity is implemented within the boundary of the project activity as described in the PDD /B01/ and revised PDD /B02/ and the implementation and operation of the project activity has been conducted in accordance with the description contained in the registered PDD /B01/ and GS4GG Transition Annex /B04/. The monitoring report /01/ has been submitted for monitoring period (from 01/06/2019 to 31/07/2021).

In summary, the operation of the project activity is in accordance with the registered PDD /B01/.

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3.3 Compliance of the monitoring plan with the monitoring methodology including applicable tool(s)

The monitoring has been carried out in accordance with the monitoring plan contained in the registered PDD /B01/ and the revised PDD /B01/.

During the course of verification, all relevant monitoring parameters have been verified with regard to the appropriateness of the applied measurement method and applied QA/QC procedures. According to the methodology, a Total energy Sales Record, Detailed Scada Database, and Project Database are maintained.

During the verification, all relevant monitoring parameters of the registered monitoring plan have been verified with regard to the appropriateness of the verification method; the correctness of the values applied for ER calculation, the accuracy and applied QA/QC measures. All monitoring parameters have been measured / determined without material misstatements and are in line with all applicable standards and relevant requirements. It is confirmed that the monitoring mechanism is effective and reliable. The electricity joint reading is taken by MEDAS (local private energy distribution company) under authorisation of government authority named TEDAS along with PP. The same is confirmed by PP during onsite visit interview.

There are 2 energy meters which belong to each HPP in the transformer Centre. One of these is the main energy meter and the other one is the back-up energy meter. The energy meters belong to TEİAŞ. The energy meters of the power plants are located within the HPP Sub Station Center. Meter reading is done by TEİAŞ Remote reading system and giving information to the power plant management by the system of TEİAŞ. Back-up meters for the control of energy production values are also located in the Substation. The TEİAŞ provides remote access to the meters and monitors produced energy amounts every 15 minutes from the Main meters. The amount of energy produced is controlled by comparing the values in the Back-up energy meters.

The information of the energy meters is verified from the Chief Project Manager of HPP. The main energy meter and the back-up energy meter are installed and working according properly as per technical staff of the HPP. The meters belong to TEİAŞ. It was confirmed that the calibration authority and responsibility for the meters goes to TEİAŞ. It was also asserted that meter maintenance and other responsibilities also belong to TEİAŞ. Therefore, it was acknowledged that the "first index determination protocol" regarding the meters was made between TEİAŞ and HPP.

In order to measure the electricity exported to the grid, the information of the installed meters was obtained from the power plant authority. Prior to the monitoring period (01/06/2019 to 31/07/2021), the meters were installed, in 2014. The Initial Index Determination Protocol includes installation information and Brand-Model information of the meters is verified during interview and document review related to meters /12/. During the monitoring period, the energy meters did not change. The first calibration document of the energy meters was verified during first monitoring period by VVB /B01/. Afterwards, it was stated that calibration was carried out at determined periods according to the legislation of TEİAŞ and Industry Ministry of Turkey /16/. The same is also confirmed during onsite visit interview with Mr. Erdal Bey (Technician-TEİAŞ Transformer Centre) by CCIPL local expert at transformer centre (energy meters location).

CC IPL cross check EPIAS recorded data in ER sheet /02/ /10/ with Metering records data /22/ of back up and main meter also. The invoice data also to cross checked with EPIAS records.

During interview with PP, it was confirmed that, the daily electricity generation logbook and common meter reading records are being followed between Energy Markets Management Inc. (EPIAŞ) and HPP over the system. It was indicated that instantaneous production values were monitored by using the remote reading system OSOS belonging to TEİAŞ. Also, the technical staff of the HPP keep the note via Excel format Daily Electricity generation logbook. The operator fills up the data hourly basis through SCADA system and adding in Excel - Daily Electricity generation logbook. Hereafter, they print these documents and sign and record them.

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It was confirmed that, the electricity generation records by the SCADA systems /17/ Monitors from OSOS Dashboard and EPIAŞ Dashboard.

The Power Plant is operated as per the production plan given to Power Plant Control Operator one day before. He records the amount of energy produced every hour in the "Daily Production Sheet" by providing remote access to the Control meter by the Central Control Operator. At the same time, these values are processed into the relevant excel table in the computer. At the end of the month, it is compared with the production values in the main meter of TEIAS and back up meter /22/. If there is an error or mistake, it will be reported to TEIAS.

Joint meter reading records (signed by the representative of the client and power transmission company MEDAS) /22/. The main meter of the power plant is read by MEDAS, and their monthly production values are officially reported to EPIAŞ. With this notification, monthly production values are reconciled between EPIAŞ and the Power Plant. Records from the metering devices used in the power plant were used to calculate the annual generation of energy. PMUM (EPIAS) records were used as a crosscheck both for generation and internal consumption. On the basis of these values ER is calculated /02/.

The above-mentioned information flow for generating, aggregating, and reporting the electricity generation values were confirmed by the Chief Project Manager of HPP. Accounting Manager is responsible for keeping data about generation and consumption. GTE Carbon (Project activity Carbon Consultant) responsible for emission reduction calculations, preparing monitoring report and periodical verification process.

Electricity generation values in the SCADA system are controlled and recorded by the power plant authorities. In addition, the data that TEIAS receives via OSOS, which is the remote reading system, is reported to the EPIAŞ system and uploaded to the "Conciliation Page". In this way, official records are finalized. Also, this information is checked by SCADA Dashboards.

The Technical Chief of the HEPPs provided the information of the operational and data collection procedures. According to him, the accuracy of the set values is checked every hour by pressing the button on the main energy meter, which is located in the substation. These values are recorded in the "daily production sheet". At the end of the month, these data are verified by comparing the main meter values read by MEDAS /22/.

According to PP, the quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring period. The technical staff of the HPP. Confirms that, the monthly meter values read by TEIAS with the remote reading system are notified to the plant operation manager via e-mail. The hourly values previously received by the Control Operator of the Power Plant are compared with the counter values sent by TEIAS. The difference between the two values is checked for measurement accuracy. If there is any data error, TEIAS officers and HPP Officers meet together on the site, try to figure out the crisis. When they find the troubles, TEIAS officers and HPP Officers correct the errors. After the correction process, they send this information to the EPIAS to correct the data of the previous production values. According to the Power Plant Chief Manager, there has been no error process so far. If an error occurs, TEIAS notifies EPIAS of the erroneous data received from the Power Plant Directorate within a reasonable time and ensures that the values are corrected and verified.

During validation calibrated meters were installed as per the regulations. The initial calibration of the electricity meters was done on 22/08/2014 as confirmed during the initial verification period. Although, re-calibration is required after ten years, nevertheless, in case of irregular difference between main and cross-check spare meters, TEIAS responsible are informed for the intervention. That means, TEIAS is responsible for the calibration and maintenance of the devices. There hasn't been any other meter test report provided other than the initial meter test Protocol since there hasn't been such request by TEIAS in line with the information by PP.

The serial numbers of the meters are 4632454 for the main meter and 4632455 for the backup meter, respectively and both are EMH brand as confirmed during the on-site visit. The accuracy class of the meters is 0.2s and they have been controlled and maintained by the grid owner.

All data collected as part of monitoring will be archived electronically by the project owner and be kept at least for 2 years after the end of the last crediting period.

Therefore, from the document review and remote inspection, it is confirmed that all the parameters were monitored in accordance with the registered monitoring plan during the monitoring period. After completing transition of project activity to GS4GG annual report /27/ has been submitted by PP to GS secretariat /26/

The verification team reviewed the monitoring plan in the PDD /B01/ /B02/ and compared it against the requirements of the applied methodology /B05/ and confirms that appropriate provisions are included for the monitoring and reporting procedures, data management, and QA/QC procedures, including maintaining the detailed project database and found in line with the requirements of CDM VVS for PA (version 03.0) /B05/ and GS4GG requirements /B09/.

CC IPL confirms with a reasonable level of assurance that the claimed emission reductions are free from material errors, omissions, or misstatements.

3.4 Monitored Parameters

EX-Post Parameters:

The monitoring plan is in accordance with the approved methodology,

ACM0002 version 12.3.0, applied by the project activity. In line with the methodology, the only parameters that need to be monitored are quantity of net electricity generation supplied by the project plant to the grid ($EG_{\text{facility},y}$), installed capacity of the hydro power plant after the implementation of the project activity (CAP_{PJ}) and area of the reservoir (A_{PJ}) as in below:

$EG_{\text{facility},y}$: The quantity of net electricity delivered to the grid has been calculated with the EPIAS (the financial settlement centre of TEIAS) records provided to the PP by TEIAS. All readings and billings are done via EPIAS system which is the legal database of the Ministry. During this verification, all EPIAS and TEIAS meter reading records have been reviewed by the verification team. The project mainly uses its own electricity however during the times when there is no generation, the project imports electricity from the grid. There are also internal reviews of the metered data which is checked by different parties. SCADA system is available from which daily reports are taken and the data collected daily is saved in plant manager computer and backed up. Records from the metering devices used in the power plant were used to calculate the annual generation of energy. EPIAS (PMUM) records were used as a crosscheck both for generation and internal consumption.

CAP_{PJ} : According to the monitoring plan in the registered PDD, the installed capacity of the power plant is monitored through checking project documents and equipment labels. Since the unit capacity of 6 turbines are 3.8 MWm/3.6 Mwe (4 turbines) and 3.2 MWm/3 Mwe (2 turbines) and total installed capacity of the project is 20.4 Mwe (20,400,000 W) in line with the electricity generation licence of the project, this value has been taken into consideration. Therefore, CC IPL hereby confirms that there hasn't been any change regarding the total installed capacity of the project.

A_{PJ} : According to the monitoring plan in the registered PDD, the area of the reservoir is

monitored and measured from topographical surveys or maps. In line with the site visit observations, the monitoring value can be taken 0 since there hasn't been any reservoir formed due to the project activity, which is also available in the registered PDD, validation report and initial and 2nd verification report.

All data collected as part of monitoring will be archived electronically by the project owner and be kept for at least two years after the crediting period.

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Ex-Ante Parameters:

All ex-ante parameters data provided in section D.1 of MR /01/ is found to be appropriate, as well as in line with monitoring methodology.

The following are the ex-ante parameters used in the ER calculation which follow registered PDD /B01/:

Parameter	Description	Justification
EG _y	Net electricity generated and delivered to the grid by all power sources serving the system, not including low-cost/must run power plants in year y	The value is used in the calculation of the Emission factor (0.541 tCO ₂ e/MWh). The emission factor has already been calculated ex-ante as 0.541 tCO ₂ e/MWh. The values applied was 459,745.428 GWh between 2008-2010. The same is verified from registered PDD /B02/.
EF _{grid,CM,y}	Combined margin CO ₂ emission factor for grid connected power generation in year y calculated using the latest available version of the "Tool to calculate the emission factor for an electricity system"	The value is used in the calculation of the Emission factor 0.541 tCO ₂ e/MWh. The same is verified from registered PDD /B02/.
EF _{CO₂,i,y,i} tCO ₂ /GJ	CO ₂ emission factor of fossil fuel type i in year y	(0.541 tCO ₂ e/MWh). The emission factor has already been calculated ex-ante as 0.541 tCO ₂ e/MWh. The value data on the parameter is available in PDD version /B01/, which has been checked. Hence it is confirmed that the ex-ante details presented on the ex-ante parameter is found appropriate.
η _{m,y}	Average net energy conversion efficiency of power unit m in year y	The value is used in the calculation of the Emission factor (0.541 tCO ₂ e/MWh). The emission factor has already been calculated ex-ante as 0.541 tCO ₂ e/MWh. The value data on the parameter is available in the Annex-1 of the "Tool to calculate emission factor for an electricity

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		system”, which has been checked. Hence it is confirmed that the ex-ante details presented on the ex-ante parameter is found appropriate.
FC _{i,y}	Amount of fuels consumed by thermal power plants for electricity generation in terms of fossil fuel type i in year y	The value is used in the calculation of the Emission factor (0.541 tCO₂e/MWh). The emission factor has already been calculated ex-ante as 0.541 tCO₂e/MWh. The value data on the parameter is available in the Annex-1 of the “Tool to calculate emission factor for an electricity system”, which has been checked. Hence it is confirmed that the ex-ante details presented on the ex-ante parameter is found appropriate.

3.5 Monitoring responsibility

Verification team assessed the management systems of implemented monitoring plan of the project activity. The management system includes the organizational structure, roles and responsibilities, data collection, transfer and aggregation procedures, training of personnel /21/, data storage and archiving and emergency procedures for the monitoring system. Based on remote interview and site visit with local expert with the employees of HGG Enerji Üretim San. Ve Tic. A.Ş (involved in the project monitoring and data collection, inspection of data storage logbook & equipment's and document review) Carbon Check confirms that the responsibilities and authorities for monitoring and reporting are appropriate and effective for the project type and hence in accordance with monitoring plan of the registered PDD and applied monitoring methodology.

3.5.1 Accuracy of equipment

TEIAS is responsible for the calibration and maintenance of the devices. There hasn't been any other meter test report provided other than the initial meter test Protocol since there hasn't been such request by TEIAS in line with the information by PP. The initial calibration of the electricity meters was done on 22/08/2014 as confirmed during the initial verification period. Although, re-calibration is required after ten years in line with registered PD /B01/ and Communique regulations guidelines /16/, nevertheless, in case of irregular difference between main and cross-check spare meters, TEIAS responsible are informed for the intervention. That means, TEIAS is responsible for the calibration and maintenance of the devices. The serial numbers of the meters are 4632454 for the main meter and 4632455 for the backup meter, respectively and both are EMH brand as confirmed during the on-site visit. The accuracy class of the meters is 0.2s and they have been controlled and maintained by the grid owner. The verification team reviewed the equipment purchase invoices/14/ and confirm that the equipment used to perform WBT are brand new.

3.6 Deviation from and/or Revision of the registered monitoring plan

No deviation has been sought for this monitoring period

3.7 Assessment of data and calculation of greenhouse gas emission reductions

The Project Proponent submitted all the relevant data and parameters required to be monitored to the verification team along with the monitoring report. All the monitoring parameters are as per the registered PDD/revised PDD and have been monitored and reported in the monitoring report. CCIPL reviewed the calculation worksheet /02/ for the emission reduction calculation for the monitoring periods 01/06/2019 to 31/07/2021. CCIPL confirms that the formulas, conversions, aggregations and factors are consistent with the monitoring plan in the PDD /B01/, revised PDD /B02/ and GS4GG Transition Annex /B04/. The reported data was checked as follows:

- Necessary data for all the parameters required to be monitored in the registered PDD /B01/ and respective revised PDD /B02/ were reviewed to ensure accuracy.
- The Project invoice Database /13/ kept electronically was reviewed along with an interview with the person responsible for data entry and data review from the HGG Enerji Üretim San. Ve Tic. A.Ş, to confirm the data entered sold during the monitoring period. Electricity sold to grid Invoices /13/ were also assessed for further check.

3.7.1 Baseline Emissions

The Project Proponent has submitted the spreadsheet showing the detailed calculation of baseline emissions and corresponding emission reduction for the PA,

Baseline emission is calculated according to the formula:

$$BE_y = EG_{PJ,y} \times EF_{grid,CM,y}$$

Where:

EG_y = Net electricity delivered to the grid by the project activity in year y excluding transmission losses of the grid.

EF_y = Emission factor calculated according to selected methodology. Emission factor has been calculated ex-ante in PDD /B01/ which is also used in calculating the baseline emissions. EF value used is 0.541 tCO₂/MWh, as it can be seen detail in excel spread sheet used for calculations.

Realized baseline emissions are calculated as follows:

$$EG_y = 127,842 \text{ MWh}$$

$$EF_{grid,CM,y} = 0.541 \text{ tCO}_2/\text{MWh}$$

$$BE_y = (127,842 \text{ MWh}) \times (0.541 \text{ tCO}_2/\text{MWh}) = 69,162 \text{ tCO}_2\text{e}$$

The above equation used for the calculation of emission reduction is in line with methodology /B06/ and registered PDD /B01/ and revised PDD /B02/.

Total verified emission reductions during the reported monitoring period (i.e., 01/06/2019 to 31/07/2021, Both days inclusive, is 69,162 tCO₂e which is based on the net export of clean energy to grid i.e., 127,842 MWh (during the monitoring period).

3.7.2 Project Emissions

Not Applicable

3.7.3 Leakage Emissions

As per the registered PDD /B01/, No leakage emissions are considered. The main emissions potentially giving rise to leakage in the context of electric sector projects are emissions arising due to activities such as power plant construction and upstream emissions from fossil fuel use (e.g., extraction, processing, transport). These emissions sources are neglected Also, the energy generating equipment is not transferred from or to another activity. Therefore, leakage is considered as "0". The same is checked and confirmed by the verification team.

3.8 Assessment of actual emission reductions with the estimate emission reductions in PDD

Estimated emission reduction in the revised PDD /B01/ and emission reduction reported in the MR /01/ for the monitoring period was comprehensively assessed by the verification team, through documents review /02/ and interviews with PP.

Following table provides comparison of estimated/ex-ante value and actual emission reduction value:

Estimated ER within the Monitoring Period tCO ₂ e	Actual ER within the Monitoring Period tCO ₂ e	Has any increase of ER's occurred?
86,680	69,162	No

In summary, verification team confirms the actual emission reduction is lower than the estimated ERs of the PA for the reported monitoring period. Based on above, verification team concludes that, the cause for the decrease of ER's for the current monitoring period (01/06/2019 to 31/07/2021, Both days inclusive) is appropriately justified by the PP, same has been verified and acceptable to the verification team.

Following is the summary of ER value/02/ calculated:

ER Summary					
Symbol	Description	Unit	2019	2020	2021
BE _y	Baseline Emissions achieved by the project activity PA	t CO ₂ e	15,545	37,355	16,262
PE _y	Project Emissions achieved by the project activity	t CO ₂ e	0	0	0
LE _y	Leakage Emissions achieved by the project activity	t CO ₂ e	0	0	0
Total Emission reduction achieved in each year		t CO ₂ e	15,545	37,355	16,262

3.9 Compliance with the sustainability monitoring plan

Sustainability monitoring plan as contained in the registered PDD /B01/ , revised PDD /B01/ and Transition Annex /B04/ and GS passport /B08/ has been monitored by the PP and the same is provided in the Monitoring report. Sustainability monitoring plan was assessed and verified by the verification team during remote interview and by means of interview with the local stakeholders and HGG Enerji Üretim San. Ve Tic. A.Ş. Personnel (who interacted with the local people before and after implementation of the project for baseline and project field discussion).

All the non-neutral indicators are monitored by PP and verified by the verification team. Following documents are parameters reviewed during the verification process:

Sustainability measures are in line with Section G of the registered Gold Standard Passport. For verification of sustainability parameters in the current monitoring period, document review, on site visit observations and interviews with local stakeholders were used.

Compliance check of the parameters indicated in the sustainability monitoring plan of the GS- Passport has been carried out, as follows in Table 4-1 below:

Table 4-1: Sustainability monitoring parameters

No.	Indicator	Chosen Parameter	Way of Monitoring (When)	Compliance Check
1	Air quality	Reduction in amount of SO ₂ and NO _x emissions	Annually based on net annual electricity generation and ex-ante fixed respective emission factor	The net electricity generation has been checked from the EPIAŞ records and the emission intensities of SO ₂ and NO _x emissions due to electricity generation are taken as: 1.96 kg/MWh and 1.50 kg/MWh respectively, as fixed ex-ante in the registered Passport. Therefore, total of 250.5tons of SO ₂ and 192.1 tons of NO _x emission reduction (avoidance) has been achieved during this monitoring period in line with the provided and checked calculation.
2	Labour Rights	Quality of Employment	Through the training attendance list and/or certificates (Annually) and new recruitment records	As per the training records and certificates checked, the trainings were on fire fighting dated as 05.12.2019 & 06.12.2019 with basic HSE, occupational diseases, hygiene provided by PP /21/
3	Labour Rights	Quantitative employment and income generation	Review of payrolls and annual expenditures provided by the Project Owner	In line with review of payrolls and annual expenditures i.e. social security records /28/ employment documents /31/, it is found that 28 people are recruited in this monitoring period, out of which, 18 of them are from local nearby villages .
4	Emissions Reductions in tCO ₂	Reduction of CO ₂ emissions due to implementation of project activity	Electricity generated by Project and ex ante fixed combined margin (CM) emission factor was used in calculation of the emission reduction.	In this monitoring period, net emission reduction was 69,162 tCO ₂ while annual emission reduction is 31,921 tCO ₂ according to the electricity generation during this monitoring period /10/ and the combined margin used for the project as per registered PD /B01/.

5	Erosion and/or water body stability	Soil condition/land restoration	Through site assessment and document for implementation of plan (Annually)	Although there hasn't been any restoration plan submitted during the verification, there hasn't been any observed degraded land due to the project activity and any complaint by the interviewed local stakeholders regarding this issue during the verification site visit.
6	Impact on natural water patterns and flow	Water Quality and Quantity	Through Site assessment and interviews with locals (Annually)	Since the project is run-off- river type, the water used for the electricity generation is released back to river with in 50m and at least 1m depth of water will always be available in weir area. Wastewater due to management activities is stored and transferred to municipal wastewater channel. A sewage truck, waste disposal record dated 24/02/2020 /24/ verified by verification team in this regard. Any complaint by the interviewed local stakeholders regarding this issue during the verification site visit also checked during the verification site visit.

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During the site visit, a septic tank for collection of wastewaters has also been checked. The sewage is transferred by sewage truck to local municipality sewage system as per the “Regulation on Control of Water Contamination”. The wastewater transfer record dated as 24/02/2020 /24/ was provided to VVB. Besides that, previously planted trees by PP had been observed during the verification site visit and the photographic evidence of the planted trees have been provided by PP.

Therefore, based on site visit observations and provided documents, it can be confirmed that sustainability parameters are monitored in line with the registered Gold Standard Passport and Monitoring Plan.

3.10 Monitoring of Gold Standard Sustainability Indicators

Verification team checked the sustainable development indicator parameters through documents review /03/, /07/ and remote interviews.

The details are provided as below:

1. SAFEGUARDING PRINCIPLE ASSESSMENT

According to GS4GG Safeguarding Principles and Requirements document for detailed guidance on carrying out assessment as summarized below:

Safeguarding principles	Assessment questions	Assessment of relevance to the project (Yes/ potentially/ no)	Justification including mitigation measures	Assessment by the validation team
Social & Economic Safeguarding Principles				
3.2 Gender Equality and Women's Rights	1. Is there a possibility that the project might reduce or put at risk women's access to or control of resources, entitlements, and benefits?	No	1. Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS, version 1.2 /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
	2. Is there a possibility that the project can adversely affect men and women in marginalised or vulnerable communities (e.g., potential increased burden on women or social isolation of men)?	No	2. Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment	
	3. Is there a possibility that the project might not take into	No	2. Turkey has ratified ILO convention 100, 111, 122 and 142, which provides	

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	account gender roles and the abilities of women or men to participate in the decisions/designs of the project's activities (such as lack of time, child care duties, low literacy or educational levels, or societal discrimination)?		gender equality and promotes women's employment	
	4. Does the project take into account gender roles and the abilities of women or men to benefit from the project's activities (e.g., Does the project criteria ensure that it includes minority groups or landless peoples)?	Yes	The project outputs serve everyone without regarding gender. It provides electricity for all.	
	5. Does the project design contribute to an increase in women's workload that adds to their care responsibilities or that prevents them from engaging in other activities?	No	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment.	
	6. Would the project potentially reproduce or further deepen discrimination against women based on gender, for instance, regarding their full participation in design and implementation or access to opportunities and benefits?	No	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment.	
	7. Would the project potentially limit women's ability to use, develop	No	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides	

	and protect natural resources, taking into account different roles and priorities of women and men in accessing and managing environmental goods and services?		gender equality and promotes women's employment.	
	8. Is there a likelihood that the proposed project would expose women and girls to further risks or hazards?	No	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment.	
	9. The project is not directly or indirectly contributed sexual harassment and/or any forms of violence against women – address the multiple risks of gender-based violence, including sexual exploitation or human trafficking.	No	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment.	
	10. The project is not directly or Indirectly contribute slavery, imprisonment, physical and mental drudgery, punishment or coercion of women and girls.	No	Turkey has ratified European Convention on Human Right on 10/03/1954, which includes the right to life as well as prohibition of torture, slavery, discrimination and forced labor.	
	11. The project is not directly or Indirectly contribute restriction of women's rights or access to resources (natural or economic).	No.	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment.	
	12. The project is not directly or	No.	Turkey has ratified ILO convention 100,	

	indirectly contribute recognize women's ownership rights regardless of marital status – adopt project measures where possible to support to women's access to inherit and own land, homes, and other assets or natural resources.		111, 122 and 142, which provides gender equality and promotes women's employment.	
	13. Where appropriate for the implementation of the project, paid, volunteer work or community contributions will be organised to provide the conditions for equitable participation of men and women in the identified tasks/activities.	Yes	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment.	
	14. The project introduces conditions that ensure the participation of women or men in project activities and benefits based on pregnancy, maternity/paternity leave, or marital status. The project also ensures that these conditions do not limit the access of women or men, as the case may be, to project participation and benefits.	Yes	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment.	
	15. The project refers to the country's national gender strategy or Equivalent national commitment to aid in assessing gender risks.	Yes	Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality. It also shows parallelism with national strategies	

			prepared for women employment by creating opportunities for all. However, there is no women working directly in the site. Women in the region mostly take roles in agricultural and husbandry activities.	
3.4.3 Land Tenure and Other Rights	a. Does the Project require any change to land tenure arrangements and/or other rights? b. For Projects involving land use tenure, are there any uncertainties with regards land tenure, access rights, usage rights or land ownership?	No	The area between regulators will be approximately 10 ha.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2 /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: This area will be expropriated according to the Turkish Expropriation Law , which is verified during interview with local stakeholder and PP.
3.6.2 Negative Economic Consequence	1. The Project Developer demonstrates the financial sustainability of the project, also including those that will occur beyond the Project Certification period.	Yes	Investment analysis has been done for the project.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2 /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders
	2. The project considers economic impacts	Yes	2. The project involved electricity generation from local	

	and demonstrate a consideration of potential risks to the local economy and how these have been taken into account in project design, implementation, operation and after the project.		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.	Investment analysis during validation stage Mitigation measure: N/A
4.1.1 Emissions	Will the project increase greenhouse gas emissions over the baseline scenario?	No	Since it is a hydro energy power plant, the project is expected to have a positive impact on Climate Change by eliminating fossil fuels. Expected amount of CO ₂ e: 40,006 tonnes.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2 /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
4.1.2 Energy Supply	Will the project use energy from a local grid or power supply (i.e., not connected to a national or regional grid) or fuel resource (such as wood, biomass) that provides for other local users?	No	Project does not use any local fuel resource. It is connected to the national grid and supply 73.95 GWh additional energy to the grid. Internal consumption which indicates the usage in the project site is read from monthly records taken from the meters.	- Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
4.2.1 Impact on natural water patterns and flow	Will the project 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?	No	Project is run-of-river type, and it uses the existing water on the river and releases back to river within 50 m. Since there is no conveyance line, no minimum flow is determined, or gauging station is required for the project activity. Also, the project is subject to water utilization right agreement dated 05/11/2010. Nearby irrigation facilities or fishing fish migration	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2 /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure:

			will not be affected. Design of the fish passage has been done according to the report dated on 12/08/2012 and DSI (State Hydraulic Works) criteria which requires free and continuous flow of water from fish passage. During construction, continuous flow will be achieved to ensure that effect on fish habitat is minimum. The weir will prevent the isolation of fish and organisms by providing a steady minimal flow, even when water level decreases. Project is impoundment type HEPP. Hence, there is no diversion of flow from natural riverbed or storage capacity. Therefore, project can not affect the flow pattern of the river. As per the water utilization rights agreement, project owner has to release all water when the minimum flow is below 10% of average flow. In practice, due to technical limitations about operation of turbines, all incoming flow is released without electricity generation when the flow is less than 30% of turbine capacity to prevent damage to the turbines. The functionality of the fish passage design of the project has been reviewed by independent	N/A
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			experts at time of construction upon request of GS. Design of the fish passage has been renewed upon recommendation of those experts and renewed design has been implemented by project owner. The report of expert has been submitted to GS during registration and 1 st and 2 nd verification.	
4.2.1 Erosion and/or water body stability	Could the project directly or indirectly cause additional erosion and/or water body instability or disrupt the natural pattern of erosion?	No	Project does not have any impact on erosion. The main construction activities are powerhouse, weir and fish passage constructions. Excavation aggregate is formed at all three sites and excavated soil is disposed appropriately and used for landscaping.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2 /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: Project had excavation work on all three project sites. Since the project sites are near the existing road which is paved already, no significant dust due to vehicles are expected however, to minimize the impact, construction site was irrigated regularly to avoid dust. To avoid dust problem in the village, trucks were covered during the transportation of the excavated soil. Also

				during the storage of the excavated soil, the top layer of the soil was kept with a %10 humidity ration to avoid the dust problem. Project is subject to a comprehensive dust formation modelling due to cement production. All the necessary procedures were followed, and it has been proved that the project dust emissions are below the regulative limit values for particulate matters. Project will have an impoundment type of weir and no conveyance line is going to be built. Design of the Project ensures that the Project will only use a small area. A part of the excavation from the construction activities will be used to support the river sideline as a precaution against flooding and some will be used for construction purposes. Remaining excavation will be stored in predesignated areas. Vertical penstocks on the body of regulators will be used as gravel pass in transferring the sediment that may be cumulated in the headwater to the downstream.
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4.2.3 Landscape modification and soil	The project site is located in the relatively plane area where the slope of Kızılırmak River decreases. Therefore, there is alluvial soil used for agricultural purpose in both side of the river.	No	The Project doesn't involve, be complicit in or inadvertently contribute to or reinforce corruption or corrupt Projects. The project is, in fact, implemented on the ground by BURN. The ethical codes of BURN and other project partners are against corruption.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2 /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: Land is limited within the project construction phase and there are no negative effect on use of land and soil for production of crops. Although project aim is to generate electricity, irrigation water allocated from the headwater has been considered during project design.
4.3.1 Landscape modification and soil	Does the project involve the use of land and soil for production of crops or other products?	No	Project site is mainly surrounded by agricultural lands which are not affected and will continue to be cultivated after project activity.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
4.3.2 Vulnerability to Natural	Will the project be susceptible to or lead to	Potentially	Avanos district is in the 3rd Degree Seismic Zone	Appropriateness for this safeguarding principle was

Disaster	increased vulnerability to wind, earthquakes, subsidence, landslides, erosion, flooding, drought or other extreme climatic conditions?		according to the earthquake zones determined by the General Directorate of Disaster Affairs	validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: All the design and construction works will be performed in accordance with relevant regulation (Earthquake Code released by the Ministry of Environment and Urbanization, 18/03/2018). The code classifies the country into earthquake zones and determines the basis of calculations regarding building construction rules, importance & priority of the buildings and ground conditions.
4.3.4 Release of pollutants	Could the project potentially result in the release of pollutants to the environment?	Potentially	Some pollutants may occur during the construction and operation phase of the project, such as waste oil and domestic waste.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders - Document review

				Mitigation measure: Waste oil and domestic Waste generated at the construction site is handled according to the national regulations on handling domestic waste.
4.3.5 Hazardous and Nonhazardous Waste	Will the project involve the manufacture, trade, release, and/ or use of hazardous and non-hazardous chemicals and/or materials?	Potentially	Project was expected to create solid, liquid and particulate wastes/emissions during its construction. Hazardous wastes were also expected such as waste oils in the construction and operation period.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: Handling, storage and disposal of these wastes were done according to the Turkish regulations. Solid wastes generated during construction and operation period are expected to be food, package, plastic bottles, etc. These wastes will be handled according to the "Regulation on Solid Waste Control". They will be collected separately and disposed, accordingly. Project activities include usage of a

				mobile concrete production unit. The cement Works will be carried out one by one and the mobile concrete production unit will be transferred to the construction site after each building is complete. There will not be any waste due to cement usage within the Project site as the cement will be supplied in sealed packages from another company. Cement making unit will be operated as per the article 9 of the waste and landscape management regulations numbered 25755, dated 14/03/2005. Wastewater generated at the site will be handled via cesspool compatible with "Water Pollution Control Regulation". Collected wastewater will be then transferred to the closest sewer line by sewage trucks. During site preparation works, some amount of waste oil generation is expected. This waste will be handled according to the "Waste Oil Control Regulation". In order to reduce dust emission during construction, Street sprinklers will
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				be used, and the trucks will be covered. "Industrial Air Pollution Control Regulation" precautions will also be implemented such as standing wind barriers, walls and planting trees in the site.
4.3.6 Pesticides and fertilizers	Will the project involve the application of pesticides and/or fertilisers?	No	The project is not relevant since it is a renewable energy project.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
4.3.7 Harvesting of forests	Will the project involve the harvesting of forests?	No	The project is not relevant since it is a renewable energy project.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
4.3.7 Harvesting of forests	Will the project involve the harvesting of forests?	No	There is no forest area in and in the close vicinity of the project area.	Appropriateness for this safeguarding principle was validated and

				confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
4.3.8 Food	Does the project modify the quantity or nutritional quality of food available such as through crop regime alteration or export or economic incentives?	No	The project is not relevant since it is a renewable energy project.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A
4.3.9 Animal Husbandry	Will the project involve animal husbandry?	No	The project is not relevant since it is a renewable energy project.	Appropriateness for this safeguarding principle was validated and confirmed through review of GS4GG SAFEGUARDING PRINCIPLES & REQUIREMENTS version 1.2, /B09/ and remote interviews with: - Representatives of Project Participant - Local Stakeholders Mitigation measure: N/A

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Verification team checked the sustainable development indicator parameters through documents review /01/ and remote interviews.

4. VERIFICATION FINDINGS

The findings of the verification are described in the following sections. The verification criteria (requirements), the means of verification and the results of verification are documented in detail in the verification protocol in Appendix 1

4.1 Compliance with the sustainability monitoring plan

The monitoring system complies with the sustainable monitoring plan. All the parameters have been discussed in the monitoring report. The “monitoring plan” as stated in the revised and approved PA-PDD /B02/, Transition Annex /B04/ and GS Passports /B08/ has been followed. The monitoring parameters and the data in the SDG matrix have been checked and cross-checked against the supporting documents. All mitigation measures have been put in place to prevent the violation of the “do no harm assessment” or to neutralise an SDG indicator.

4.12 Monitoring of Gold Standard SDG Indicators

Parameters that are monitored in accordance with the monitoring plan for data and parameters monitored and SDG indicators as referred in the GS Transition Annex /B04/

Relevant SDG Indicator	SDG 7: Affordable and Clean Energy
Data/parameter Description	Production of clean energy
Unit/Value	127,842 MWh
Source of data /frequency	Metering records
VVB Assessment	In line with review of the section B.6.1 of GS PDD /B02/, section E.5 of MR /01/ and verification document review and interview during site visit verification team confirms that project has achieved this SDG during this monitoring period by generating clean energy through renewable source i.e., hydroelectricity.

Relevant SDG Indicator	SDG 9: Industry, Innovation and Infrastructure
Data/parameter -Description	Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.
Unit/Value	Infrastructural benefits
Source of data /frequency	Implementation of project activity as per PDD /B01/
VVB Assessment	In line with review of the section B.6.1 of GS PDD /B02/, section E.5 of MR /01/ and verification document review and site visit verification team confirms that project has achieved this SDG during this monitoring period through installation of this bundle hydroelectric unit.

Relevant SDG Indicator	SDG 13: Climate Action
Data/parameter -Description	The project contributes to SDG Target 13 with an expected amount of 40,006 tonnes of CO ₂ e, which represent direct and quantifiable impact on climate security
Unit/Value	tonnes of CO ₂ e
Source of data /frequency	Project monitoring database/Continuously

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VVB Assessment	In line with review of the section B.6.1 of GS PDD /B02/, section E.5 of MR /01/ and verification document review and interview during site visit verification team confirms that project has achieved this SDG during this monitoring period by achieving CO ₂ emission reduction of 69,162 tCO ₂ ., which would otherwise generate through fossil fuel-based unit.
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Appendix 1. Gold Standard Verification Protocol

CC IPL's Checklist question	Ref.	MoV ¹	Findings, comments, references, data sources	Draft conclusion	Final conclusion
1. Sustainability Monitoring					
1.1 Have all SDG indicators been monitored as per the sustainability monitoring plan?	/1/	DR,	Yes, all the SDG indicators have been monitored as per the sustainability monitoring plan.	OK	OK
1.2 Have the methods to monitor data changed? And are they suitable to the project scale and type?	/1/	DR	Methods to monitor data have not changed as compared with the monitoring plan in the registered passport and monitoring plan.	OK	OK
1.3 Has the way of monitoring been followed? With the inclusion of dates and parameters?	/1/	DR	The sustainability monitoring plan has been followed as per described in the Passport.	OK	OK
1.4 Have mitigation measures been put in place to prevent the risk of the violation of the safeguarding principle of "Do No Harm" assessment or to neutralise a Sustainable Development Indicator that is being monitored?	/1/	DR	The mitigation measures have been put in place that has been put in records as a proof of the same. Several supporting documents as listed under section 2.1 have been provided. Also, the onsite and remote interview of the local stakeholder and interviews of the trained personals of PP were performed during on remote interview.	OK	OK
1.5 Has all the data in the Sustainability development matrix been verified and cross checked against available sources of project data? Has it been described how sustainable development would be affected if a variance occurred?	/1/	DR and remote interview	Yes, all data in the sustainability development matrix have been verified and cross checked from the supporting documents and during remote audit.	OK	OK

¹ MoV = Means of Verification, DR = Document Review, I = Interview, www = internet search.

CC IPL's Checklist question	Ref.	MoV ¹	Findings, comments, references, data sources	Draft conclusion	Final conclusion
2. Other					
2.1 Are there any issues from the previous validation/verification? (i.e., FARs, requests / approvals for RMP)	/1/ /B03/	DR	No	OK	OK
2.2 Has the project ever received any requests for reviews or incompletes from the UNFCCC or GS Secretariat?	/1/ /B03/	DR	No there are no request for reviews or incomplete for the project.	OK	OK
2.3 The evaluation of the status of mitigation and compensation measures has been verified.	/1/ /B03/	DR	Yes, the status of mitigation and compensation measures has been verified.	OK	OK

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APPENDIX 2. CERTIFICATION STATEMENT

Carbon Check (India) Private Ltd., the VVB, has performed the verification of Project Activity (GS1208) registered with the GS –PA “Cemel Hydro Bundle”.

The project activity is designed to generate emission reductions by GHG reduction by using renewable energy source (hydro) and supplies electricity to the grid through displacement of electricity that would be provided to the grid by more-GHG-intensive means i.e., by thermal power plants. The project participants are responsible for the collection of data in accordance with the monitoring plan and the reporting of GHG emissions reductions from the project. It is VVB's responsibility to express an independent verification statement on the reported GHG emission reductions from the project. The verification is carried out in-line with the VVS and GS4GG requirements.

Verification was performed to identify the compliance of the project activity with implementation and monitoring requirements and to verify the actual amount of achieved net emission reductions, through obtaining evidence and information and by conducting remote and onsite interviews that includes:

- i) To confirm whether the provisions of the monitoring methodology and the monitoring plan were consistently and appropriately applied and
- ii) To check the evidence supporting the reported data.

The VVB had raised 04 CLs and 04 CARs which are resolved by the PP.

The VVB with reasonable assurance confirms that reported net GHG emission reductions were calculated correctly on the basis of the approved baseline and monitoring methodology and the monitoring plan (as contained in the registered PDD and revised PDD) and are fairly stated.

The VVB, hereby certifies that the project activity, achieved net emission reductions of 69,162 tCO₂ equivalent and all monitoring requirements have been fulfilled and is substantiated by an audit trail that contains evidence and records.

APPENDIX 3. LIST OF FINDINGS

Table 1. Remaining FARs from validation and/or previous verification

FAR ID	xx	Section no.		Date: DD/MM/YYYY
Description of FAR				
<i>Not Applicable</i>				
PP response				Date: DD/MM/YYYY
<i>Not Applicable</i>				
Documentation provided by the PP				
<i>Not Applicable</i>				
GS VVB assessment				Date: DD/MM/YYYY
<i>Not Applicable</i>				

Table 2. CLs from this verification

CL ID	01	Section no.	Whole MR	Date: 27/11/2021
Description of CL				
Version of the PDD mentioned in key information section of MR /01/ (Ver 10 dated 04/11/2019) does not match on GS registry project page. PP is requested to provide evidence for submission of the stated PDD to GS secretariat.				
Project participant response				Date: 02/12/2021
Version of the PDD mentioned in key information section of MR is changed, according to the one that is uploaded to GS registry.				
VVB Assessment #1				Date: 02/12/2021
MR /01/ is prepared by using Ver 10 of PDD (dated 04/11/2019), which was submitted at the transition period hence version 7 of PDD used cannot mention in MR. PP is requested to provide evidence for submission of the stated PDD to GS secretariat/registry. Hence is CL is Open.				
Project participant response #2				Date: 07/12/2021
Gold Standard has been contacted about the issue.				
Documentation provided by project participant				
NA				
GS VVB assessment				Date: 07/12/2021
<i>In line with above response provided by PP, Verification team confirms that, the Ver 10 of the PDD (dated 04/11/2019) has been communicated to GS registry and the same is valid. Hence, this CL is closed.</i>				

CL ID	02	Section no.	Whole MR	Date: 27/11/2021
Description of CL				
Name of the PP i.e., "HGG Enerji Üretim San. Ve Tic. A.Ş." mentioned in monitoring report does not match with the name of the PP mentioned in registered PDD /B01/ i.e. "Zeynep Enerji Üretim San. Ve Tic. A.Ş.". However, the name "HGG Enerji Üretim San. Ve Tic. A.Ş." can be evidenced on Annual report submitted by PP for verification purpose. PP needs to clarify the same by providing information on submission of name change document to GS secretariat along with submission proof of name change to VVB. PP is also requested to justify and elaborate more on reason of name change in section B.2 of MR /01/ in addition to the statement on name change provided in same section.				
Project participant response				Date: 02/12/2021
PP name change request is already initiated by PP with GS registry team and the same communication with GS registry dated 2 nd Dec. 2021 is submitted to the VVB for information purpose. Reason of the name change has been elaborated now in relevant section of revised MR.				
Documentation provided by project participant				
<i>PP name change communication email dated 2nd Dec. 2021</i>				

GS VVB assessment	Date: 02/12/2021
The Email communication received from Project Developer indicates that the name change process is initiated by PP, which states that name change of PP can be conduct on GS project page ,in project description section. Which is acceptable to VVB (subject to actual change of name in Description section on project page). The name change interpretation provided in revised MR is found to be appropriate in relevant section of the MR. Hence this CL is closed.	

CL ID	03	Section no.	Whole ER and MR	Date: 27/11/2021
Description of CL				
While reviewing the ER sheet /02/ submitted by PP to verification team, it has been found that Avg. NG price and Avg. currency calculated and provided in MR /01/ is on the basis of database covering period of 2017-19 i.e., for last monitoring period. PP needs to clarify that why PP has not calculated the same on the basis of current monitoring period database i.e., 2019 to 2021.				
Project participant response				Date: 02/12/2021
Avg. NG price and Avg. currency is revised by using government database for the period of 2019-2021, which is relevant period for current monitoring period (06/2019 – 07/2021). Accordingly, the same is reflected in revised ER spread sheet.				
Documentation provided by project participant				
<i>Revised ER spread sheet /02/</i>				
GS VVB assessment				Date: 02/12/2021
The changes made in revised ER spread sheet is found to be using latest available data matching with monitoring period. Hence, this CL is closed.				

CL ID	04	Section no.	D.2 of MR	Date: 27/11/2021
Description of CL				
In section D.2 of MR /01/, PP needs to provide explanation for the name change of the PMUM (as per registered PDD /B01/ and /B04/) i.e., Energy Markets Management Inc. to EPIAŞ for clarity purpose in addition to the statement mentioned in section C of MR /01/,as it is a deviation from registered PDD.				
Project participant response				Date: 02/12/2021
Both in D.2 and Section C, clarification has been done about transition from PMUM to EPIAS.				
Documentation provided by project participant				
<i>Revised MR /01/</i>				
GS VVB assessment				Date: 02/12/2021
The clarification provided in MR is acceptable to VVB. Hence, this CL is closed.				

Table 3. CARs from this verification

CAR ID	01	Section no.	D.2 of MR	Date: 27/11/2021
Description of CAR				
PP is requested to provide calibration details of the energy meters, used in the monitoring period, along with details of calibration such meter sr. no., date of calibration, due date of calibration, if any change of meters during monitoring period etc. in section D.2 of MR /01/.				
Project participant response				Date: 02/12/2021
Calibration documents are requested to TEIAS. As soon as documents will receive , it will be provided to VVB. Accordingly, the details will be provided in revised MR.				
VVB Assessment #1				Date: 02/12/2021
Verification team is waiting for calibration certificates and revised MR. Hence, this CAR is open.				
Project participant response #2				Date:07/12/2021
A calibration report submitted by PP from TEIAS is now provided to VVB.				
Documentation provided by project participant				
<i>Energy meters (main and back up) calibration report</i>				
GS VVB assessment				Date: 07/12/2021

Provided calibration report by PP has been reviewed by verification team and found it is in line with requirements provided in MR. PP also has modified the revised MR to incorporate calibration details of both meters covering this monitoring period. Hence, this CAR is closed.

CAR ID	02	Section no.	Section G of MR	Date: 27/11/2021
Description of CAR				
In section G of the MR /01/, PP has not provided information on stakeholder inputs and legal disputes as per requirements of Monitoring-Report template V1.1 /B07/ and GS Stakeholder-Consultation requirements V 1.2 /B09/.				
Project participant response				Date: 02/12/2021
Section G has been filled accordingly.				
VVB Assessment #1				Date: 02/12/2021
The information provided in section G of the revised MR, is not relevant to the ongoing stakeholders consultation mechanism, used by PP while consultation with local stakeholder as mentioned in GS Stakeholder-Consultation requirements V 1.2 /B09/. The information provided here is about discussion carried out by Verification team during onsite visit interview with one stakeholder during interview. PP is requested to provide information on stakeholder's inputs /comments received during , ongoing consultation mechanism with local stakeholder during current monitoring period in section G of MR. Hence, this CAR is open.				
Project participant response #2				Date: 07/12/2021
No comments received from the local stakeholders during Continuous Input and Grievance Mechanism during this monitoring period. The same is stated in section G.1 of the MR.				
Documentation provided by project participant				
<i>Revised MR</i>				
GS VVB assessment				Date: 07/12/2021
The explanation provided by PP in section G.1 of revised MR is found to be in line with GS requirements, hence this CAR is closed.				

CAR ID	03	Section no.		Date: 27/11/2021
Description of CAR				
While carrying out document review of EPIAS records (web portal screenshot) values to cross check with ER sheet /02/ provided values, it has been found that values provided for June and July 2021 from EPIAS records into ER sheet are not matching for energy export to grid and import from grid. For the month of June 21, the actual value (and ER sheet value) from EPIAS record for energy export is 3554.22 (2344.25) MWh and energy import are 21.96 (16.03) MWh and for the month of July 2021, the actual value (and ER sheet value) from EPIAS record for energy export is 2080.09 (1767.60) MWh and energy import is 28.61 (20.09) MWh. PP needs to correct these values in revised ER sheet. Also, after putting the above-mentioned values in ER sheet, the difference for electricity export and import in comparison with Joint metering records values for the month of June 21 is 1209.97 and 5.9 MWh and for the month July 21 is 312.39 and 8.5 MWh respectively. PP needs to justify the difference in response and the same to be clarified in the revised MR.				
Project participant response				Date: 02/12/2021
EPIAS records (web portal screenshot) values are taken into consideration and used in ER sheet. The correct values of energy export to grid and import from grid are respectively 2344.25 MWh and 16.03 MWh (for June 2021) and 1747.60 MWh and 20.09 MWh (for July 2021). Related documents belonging to June 2021 and July 2021 are provided again. The reason for this complication is that there were a separate EPIAS Excel Sheet including energy export to grid and import from grid. However, only in June 2021 and July 2021, the data did not match.				
Documentation provided by project participant				
<i>EPIAS Records Monthly Index (June 2021 and July 2021)</i>				
GS VVB assessment				Date: 02/12/2021
Provided correct documents reviewed by verification team and found that the correct values are applied in ER sheet. Hence, this CAR is closed.				

CAR ID	04	Section no.		Date: 27/11/2021
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CARBON CHECK (INDIA) PRIVATE LIMITED

CIN: U74930DL2012PTC232495

Regd. Off: 2071/38, 2nd Floor, Nai Wala, Karol Bagh, New Delhi - 110005

Corporate off: Unit No. 1701, Logix City Centre Office Tower, Plot No. BW-58, Sector-32 Noida, Uttar Pradesh

Tel: +91 120 4373114 | URL: www.carboncheck.co.in | e-mail: info@carboncheck.co.in

Description of CAR	
The commissioning date mentioned in section A.4 of the MR is not matching with date mentioned in section B.1 of MR for CEMEL III unit. As per previous verification reports it is confirmed that the date of Cemel III commissioning is 03/07/2015. The same date is also not matching in section B.2.3 and B.2.4 of MR.	
Project participant response	Date: 02/12/2021
The commissioning date mentioned in section A.4 of the MR is now corrected, matching with the date in B.1, B.2.3 and B.2.4.	
Documentation provided by project participant	
<i>Provisional Acceptances</i>	
GS VVB assessment	Date: 02/12/2021
The date of commissioning provided in revised MR , are found to be unique in each section of MR. Hence, this CAR is closed.	

APPENDIX 4. CERTIFICATE OF COMPETENCE



Carbon Check (India) Private Ltd.

Mr. Dinesh M Mane

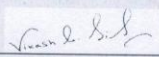
has been qualified as per CCIPL's internal qualification procedures, in accordance with requirements of Accreditation Standard (version 07.0):

For following functions:

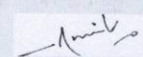
Validator	☒	Team Leader	☒	Technical reviewer	☐
Verifier	☒	Technical Expert	☒	Local Assessor ¹	☒

In the following Technical Areas:

TA 1.1	☐	TA 4.1	☐	TA 9.1	☐	TA 13.1	☐
TA 1.2	☒	TA 5.1	☐	TA 9.2	☐	TA 13.2	☐
TA 3.1	☐	TA 5.2	☐	TA 10.1	☐	TA 14.1	☐



Mr. Vikas Kumar Singh
Compliance Officer



Mr. Amit Anand
CEO

Date of Approval
24/12/2021

Valid Till
23/12/2022

Revision History of the Document

01/03/2020 ²	Interim Revision for office address change
01/09/2020	Interim Revision for CCIPL logo change
24/12/2020	Annual Revision

¹ India.

² Please refer to previous version of competency certificates for the revision history.

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Tel: +91 120 4373114 | URL: www.carboncheck.co.in | e-mail: info@carboncheck.co.in

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Tel: +91 120 4373114 | URL: www.carboncheck.co.in | e-mail: info@carboncheck.co.in



Carbon Check (India) Private Ltd.

Indumathi. C

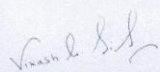
has been qualified as per CCIPL's internal qualification procedures, in accordance with requirements of Accreditation Standard (version 07.0):

For following functions:

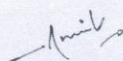
Validator ☐ Team Leader ☒ Technical reviewer ☒
 Verifier ☐ Technical Expert ☒ Local Assessor¹ ☒

In the following Technical Areas:

TA 1.1 ☒ TA 3.1 ☒ TA 5.2 ☐ TA 9.2 ☐ TA 13.2 ☒
 TA 1.2 ☒ TA 4.1 ☐ TA 8.1 ☐ TA 10.1 ☐ TA 14.1 ☐
 TA 2.1 ☐ TA 5.1 ☐ TA 9.1 ☐ TA 13.1 ☒



Mr. Vikash Kumar Singh
Compliance Officer



Mr. Amit Anand
CEO

Date of Approval
29/09/2021

Valid Till
24/12/2021

Revision History of the Document

26/12/2014	Initial Adoption
24/12/2015	Annual Revision
20/01/2016	Interim Revision for office address change
23/12/2017	Annual Revision
24/12/2017	Annual Revision
24/12/2018	Annual Revision
24/12/2019	Annual Revision
01/03/2020	Interim Revision for office address change
01/09/2020	Interim Revision for CCIPL logo change
24/12/2020	Annual Revision

¹ India and Sri Lanka

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