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# VERIFICATION AND CERTIFICATION REPORT

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Eksim Enerji A.Ş.


Silivri WPP

IN

TURKEY

MONITORING PERIOD:

From 20/08/2021 to 30/11/2023 (both days included)

<b>Organizational Unit:</b>	Re Carbon Ltd.		
<b>Project Title:</b>	Silivri WPP		
<b>Project Number:</b>	<b>Client:</b>	<b>Current MR Version:</b>	
857	Eksim Enerji A.Ş.	5	
<b>Date of First Issue:</b>	<b>Date of Current Version:</b>	<b>Version Number:</b>	<b>Number of Pages:</b>
10/10/2024	17/02/2025	03	55
<b>Verification Number:</b>	<b>Registration Number:</b>	<b>Monitoring Period:</b>	
4 <sup>th</sup> (1 <sup>st</sup> of 2 <sup>nd</sup> CP)	GS4264	From: 20/08/2021	To: 30/11/2023
<b>Summary:</b>			
<b>Host Country: Turkey</b>			
<b>Project is Reviewed Against:</b>			
<input checked="" type="checkbox"/> Kyoto Protocol <input checked="" type="checkbox"/> UNFCCC CDM rules and regulations and associated documents <input checked="" type="checkbox"/> Gold Standard rules and regulations <input type="checkbox"/> Other (Please Specify)			
<b>Methodology:</b> ACM0002, Grid-connected electricity generation from renewable sources			
<b>Version:</b> 20.0			
<b>Verified Emissions Reductions:</b> 223,009 tCO <sub>2</sub> e			
<b>Project Size:</b> <input checked="" type="checkbox"/> Large Scale <input type="checkbox"/> Small Scale <input type="checkbox"/> Micro Scale			
<b>Project Developers:</b>	Eksim Enerji A.Ş. (Project Owner) Sıla Duran (Project Representative)		
<b>Verification Stages:</b>			
<input checked="" type="checkbox"/> Desk Review <input checked="" type="checkbox"/> Site Visit <input checked="" type="checkbox"/> Follow-up Interviews <input checked="" type="checkbox"/> Resolution of Outstanding Issues			
<b>Verification Findings:</b>			
<p>During the verification 23 Corrective Action Requests and 00 Clarification Requests were issued, all of which were closed out before the issuance of this verification report. No Forward Action Requests were issued during the verification, all of which shall be addressed during the next verification of the project activity.</p> <p>In summary, it is Re Carbon Ltd.'s opinion that the project activity "Silivri WPP" in Turkey, is in compliance with the monitoring plan described in the registered PDD, version 10 and dated 06/09/2023. The GHG emission reductions are calculated correctly as per the applied methodology and the emission reductions given in the monitoring report version 5 dated 03/02/2025 are fairly stated.</p>			
<b>Verification Team Leader:</b>	Ms. İrem TAŞKIRAN		<b>Indexing Terms:</b>
<b>Verification Team Members:</b>	N/A		<input checked="" type="checkbox"/> No distribution without permission of the client or responsible organizational unit  <input type="checkbox"/> Limited Distribution <input type="checkbox"/> Unrestricted Distribution
<b>Approved By (Technical Reviewer):</b>	<b>Name:</b>	<b>Signature:</b>	
	Rohit BADAYA		

## **Abbreviations**

<b>CAR</b>	: Corrective Action Request
<b>CDM</b>	: Clean Development Mechanism
<b>CEF</b>	: Carbon Emission Factor
<b>CER</b>	: Certified Emission Reduction(s)
<b>CL</b>	: Clarification request
<b>CO<sub>2</sub></b>	: Carbon dioxide
<b>CO<sub>2</sub>e</b>	: Carbon dioxide equivalent
<b>DNA</b>	: Designated National Authority
<b>DOE</b>	: Designated Operational Entity
<b>DR</b>	: Document Review
<b>EF</b>	: Emission Factor
<b>ER</b>	: Emission Reductions
<b>ERPA</b>	: Emission Reduction Purchase Agreement
<b>FAR</b>	: Forward Action Request
<b>GHG</b>	: Greenhouse gas(es)
<b>GS</b>	: Gold Standard
<b>GS4GG</b>	: Gold Standard for Global Goals
<b>GWP</b>	: Global Warming Potential
<b>I</b>	: Interview
<b>IPCC</b>	: Intergovernmental Panel on Climate Change
<b>kWh</b>	: Kilo Watt Hour
<b>MP</b>	: Monitoring Plan
<b>MoV</b>	: Means of Verification
<b>MW</b>	: Mega Watt
<b>MWh</b>	: Mega Watt Hour
<b>NGO</b>	: Non-governmental Organisation
<b>ODA</b>	: Official Development Assistance
<b>PDD</b>	: Project Design Document
<b>PD</b>	: Project Developer(s)
<b>tCO<sub>2</sub>e</b>	: Tonnes of CO <sub>2</sub> equivalents
<b>UNFCCC</b>	: United Nations Framework Convention on Climate Change

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## 1. EXECUTIVE SUMMARY– VERIFICATION AND CERTIFICATION OPINION

Re Carbon Ltd. performed the 4<sup>th</sup> (1<sup>st</sup> of 2<sup>nd</sup> CP) verification of the “Silivri WPP”, a Gold Standard project with the registry reference number “GS4264” for the period in between 07/12/2023 and 15/10/2024. The scope of the activities covers the verification and certification of GHG emissions reductions reported in the Monitoring Report Version 5, dated 03/02/2025 of “Silivri WPP”.

Re Carbon Ltd. hereby confirms that the project activity “Silivri WPP” in Turkey, is implemented in accordance with the validated and registered PDD version 10, dated 06/09/2023. The monitoring system is in place and the emission reductions are calculated without material misstatements as per the applied approved methodology, which is “ACM0002 “Grid-connected electricity generation from renewable sources, Version 20.0”.

Re Carbon Ltd. confirms the following based on the results of document review and on-site assessment:

The implementation of the project has resulted in the avoidance of 223,009<sup>1</sup> tCO<sub>2</sub>e during the monitoring period in between 20/08/2021 and 30/11/2023.

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<sup>1</sup> The emission reductions have been capped to the upper bound of the sensitivity analysis range (The emission reductions have been capped to 10% upper limit of amount estimated ex ante deducted) for the monitoring period as per Rule Clarification -ASSESSMENT APPROACH FOR REPORTING HIGHER EX-POST EMISSION REDUCTIONS.

## 2. INTRODUCTION

### 2.1. Objective

Through a contract, dated 18/02/2022, Re Carbon Ltd. was appointed by “Eksim Enerji A.Ş.” to perform the 4<sup>th</sup> (1<sup>st</sup> of 2<sup>nd</sup> CP) verification of the “Silivri WPP”. The objective of this verification activity was to assess, with objective evidence:

- if the monitoring report version 5, dated “03/02/2025” conforms with the requirements of the monitoring plan of the registered PDD and the approved methodology
- if the project activity conforms with the monitoring report and the registered PDD, and
- if the data reported in the monitoring report are complete and transparent.

### 2.2. Scope

The scope of the verification is the independent and objective review of the monitored GHG reductions. The verification activity is based on the validated and registered PDD version 10, dated 06/09/2023.

The project activity and the monitoring report are assessed against the requirements of Article 12 of the Kyoto Protocol, CDM Modalities and Procedures as agreed on in the Marrakech Accords under decision 3/CMP.1, the annexes to that decision, “ACM0002 “Grid-connected electricity generation from renewable sources, Version 20.0”, subsequent decisions and guidance made by COP/MOP and the CDM Executive Board as well as other related rules, according to the guidance given in the CDM Validation and Verification Standard for project activities version 3.0, CDM Project Standard for project activities version 3.0, Gold Standard for the Global Goals (GS4GG) version 1.2 and other relevant GS4GG requirements.

The only purpose of the verification and certification is its usage during the issuance process as part of the GS project cycle. Therefore, Re Carbon Ltd. cannot be held liable by any party for decisions made or not made based on the verification and certification opinion, which will go beyond that purpose.

### 2.3. Description of the Project Activity

The Silivri WPP is operated by Eksim Enerji A.Ş. The project activity is located in İstanbul Province, in Marmara Region of Turkey. 2<sup>nd</sup> crediting period is between 20/08/2021 to 19/08/2028. As per the generation license dated 31/03/2017, the project activity includes 23 wind turbines currently and total installed capacity is 63 MW/63 MWe. The project began generating electricity on 20/08/2014, marking its official first acceptance by the Ministry of Energy with 10 turbines. Subsequently, an additional 5 turbines were added on 04/09/2014, as noted in the second official acceptance by the Ministry. Another 3 turbines were added on 19/09/2014, marking the third acceptance, followed by an additional 2 turbines on 11/01/2019, marking the fourth acceptance. Finally, on 25/10/2019 last 3 turbines were commissioned by the Ministry, bringing the total to 23 turbines and increasing the capacity to 63 MW. Despite this, the project can only use 45 MW of its capacity for ER calculation and electricity generation (i.e. Nordex N100 and Nordex N131 wind turbines) for the registered project activity. This information has been confirmed via the registered PDD version 10 dated 06/09/2023. Therefore, the total installed

capacity of the registered project activity is 45 MW. The electricity generated at project is fed to the national grid via Silivri transformer station on 154 kV high-voltage Level Transformer Center. The purpose of the proposed project is to generate electricity by utilizing the renewable energy. Total amount of electricity generation is 378,227.25 MWh and emission reduction achieved in this monitoring period is 234,423 tons of CO<sub>2</sub>e. However, emission reduction is capped to the limit which is 223,009<sup>2</sup> tons CO<sub>2</sub>e.

There are 2 electricity meters and these meters measure the generated electricity of 63 MWe. Therefore, a calculation has been introduced to calculate the generated electricity of 45 MWe. During the monitoring of net energy generation (SDG7) value calculation, PP has simply subtracted the SCADA values of unregistered 5 turbines' electricity generation from all 23 turbines gross generation data of EPIAS. In this way, PP found a registered production of 45 MW from 18 turbines of 45 MW. The formula of the electricity generation is as follows:

$$\text{Adjusted net electricity supplied to the grid} = \text{EG}_{P,J,y} - \text{Generation of Added Capacity Taken from the SCADA System}^3.$$

Where:

$\text{EG}_{P,J,y}$  = Net electricity generation (63 MW) supplied to the grid in year y by the project plant/unit (MWh/yr)

Generation of Added Capacity Taken from the SCADA System = Quantity of total net electricity generation from SCADA of unregistered 5 turbines

For Nordex N100 wind turbines:

Parameter	Value
Manufacturer	Nordex
Type of Turbines Used	Steel tubular, conical shape
Rotor diameter	99.8 m
Rated Power	2500 kW
Swept area	7823 m <sup>2</sup>
Hub height	80 m
Cut-in / cut-out wind speed	3.0 - 25.0 m/s

For Nordex N131 wind turbines:

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<sup>2</sup> The emission reductions have been capped to the upper bound of the sensitivity analysis range (The emission reductions have been capped to 10% upper limit of amount estimated ex ante deducted) for the monitoring period as per Rule Clarification -ASSESSMENT APPROACH FOR REPORTING HIGHER EX-POST EMISSION REDUCTIONS.

<sup>3</sup>This calculation was approved during the 3<sup>rd</sup> Verification of the Project Activity.

Parameter	Value
Manufacturer	Nordex
Type of Turbines Used	Steel tubular, conical shape
Rotor diameter	131 m
Rated Power	3600 kW
Swept area	13478 m <sup>2</sup>
Hub height	112 m
Cut-in / cut-out wind speed	3.0 - 20.0 m/s

First crediting period was between 20/08/2014 to 19/08/2021. The second crediting period start date of the project as verified from the information provided on GS Registry and registered PDD version 10, is between 20/08/2021 to 19/08/2028. This is the 1<sup>st</sup> monitoring period of the second crediting period /4<sup>th</sup> in total) which the monitoring is in between 20/08/2021 and 30/11/2023 (both days included).

VVB has checked and confirmed that there is no legal contest or dispute has arisen during monitoring period. Signed declaration has been provided to VVB and VVB has been confirmed this information via public search.

#### **2.4. Parties Involved**

Eksim Enerji A.Ş. is the project owner and host country is Turkey.

#### **2.5. Verification Period Covered**

This is the 1<sup>st</sup> verification process of 2<sup>nd</sup> CP (totally 4<sup>th</sup> verification), verification period is from 20/08/2021 to 30/11/2023 (both days included). First crediting period was between 20/08/2014 to 19/08/2021. Second crediting period is between 20/08/2021 to 19/08/2028.

### 3. METHODOLOGY

The verification of this GS project activity includes the following steps:

- Assessment of the conformity of the actual project activity and its operation with the registered PDD version 10, dated 06/09/2023
- A physical site visit, executed on 13/12/2023 in order to assess that all physical features of the project activity proposed in the registered PDD are in place and that the project developer has operated the project activity in line with the registered PDD.
- Assessment of the compliance of the monitoring plan with the monitoring methodology “ACM0002 “Grid-connected electricity generation from renewable sources”, Version 20.0”
- Assessment of the compliance of the monitoring with the monitoring plan
- Assessment of data and calculation of greenhouse gas emission reductions
- Issuance of the verification report
- Independent technical review
- Approval of the verification report and request for issuance

The Verification Protocol is used for the assessment of each requirement during the execution of verification activities and is given in Annex-1 of this verification report.

The Verification Protocol consists of the following table:

- Table 1 (Resolution of Corrective Action, Forward Action and Clarification Requests)

The usage description of Table-1 in the Verification Protocol is explained in Table 3-1 below:

**Table 3-1:** Explanation of Table-1 in the Verification Protocol

Draft Report Clarifications, Forward Action and Corrective Action Requests by Verification Team	Ref. to Questions in Table-1 and Table-2	Summary of Project Developers' Response	Verification Team Conclusion
The all CL, FAR and CARs determined during the draft verification report should be listed here	Gives reference to the checklist questions in Table-1 of Verification Protocol	Is used to summarize the responses by project developers regarding the non-conformities	Is used to summarize the responses by verification and their conclusions

The Verification Protocol is filled out by the verification team in line with the descriptions above. All CARs, CLs and FARs are listed in a transparent and clear manner.

### 3.1. Verification Team and ITR Selection

The appointment process of the verification team takes into account the technical area(s), sectoral scope(s), and relevant host country experience required by the team members for the verification of the emission reductions achieved by the project activity in the related monitoring period for this verification. The relevant GS verification and previous ITR experiences are also assessed during the selection of the team members as well as the Independent Technical Reviewer (ITR). The verification team and ITR was assigned to this verification activity on 27/01/2022, taking all the above factors into consideration and following the contract review procedure. On 11/12/2023 team change has been done since new team leader İrem Taşkıran is a fully qualified.

The verification team and ITR details are given in Table 3-3 below:

**Table 3-3:** Verification team and ITR details

Name	Role	Host Country Experience	GHG Project Type Coverage	Technical Expertise	Involvement*
İrem TAŞKIRAN	Current Team Leader	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	A, DR, SV, R
Selen CİLASUN	Previous Team Leader	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	A, DR
Rohit BADAYA	ITR	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ITR

\* Explanations for the abbreviations used for involvement types are as follows:

- A : Administrative
- DR : Desk Review
- SV : Site Visit
- RA : Remote Assessment<sup>4</sup>
- R : Reporting
- ITR : Independent Technical Review

### 3.2. Audit Techniques

According to GS4GG Audit Techniques Template explanation<sup>5</sup> “If the latest version of the “Site Visit and Remote Audit Requirements” (v.2.0) is being used, it is not mandatory to the “Audit Techniques Template”, however the VVB shall ensure that all the relevant information related to the means of verification and auditing techniques used is reported in the validation/verification report.” Hence “Site Visit and Remote Audit Requirements” (v.2.0) have been used to complete the project’s verification process. Furthermore, a physical site visit has been conducted to eliminate the remote site-visit verification risks. Site visit mode, audit techniques are also detailed in Section 3.2 of this report. Furthermore, site visit has been conducted by verification team members who has a local expertise. In conclusion, VVB completed the auditing process by complying with “Site Visit and Remote Audit Requirements” (v.2.0)” and VVB has a positive opinion on all the CARs raised. Please check the audit techniques used during the verification and provide where you use them throughout your report:

The following audit techniques have been used during the verification of this project:

- observation;
- inquiry;
- analytical testing;
- confirmation;
- recalculation;
- examination;
- retracing;
- tracing;
- control testing;
- sampling;
- estimate testing;
- cross-checking;
- reconciliation.

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<sup>5</sup> [Audit techniques – Gold Standard for the Global Goals](#)

### 3.3. Desk Review of Documents

The basis for the verification activity is the monitoring report version 01, dated 06/12/2023, which was submitted to the verification team on 07/12/2023. This monitoring report was revised several times due to issued CARs and CLs, resulting in version 5, dated 03/02/2025 as the final version. The monitoring report and the monitoring activities were assessed against the registered PDD, version 10, dated 06/09/2023, the “ACM0002, Grid-connected electricity generation from renewable sources, Version 20.0”, the relevant CDM rules and regulations, CDM Validation and Verification Standard for project activities version 3.0, CDM Project Standard for project activities version 3.0, GS4GG version 1.2, and the following:

- final validation report of “2<sup>nd</sup> crediting period version 05 has been prepared by Re Carbon Ltd. on 26/09/2023” team of the crediting period renewal process and verification process are different. Team of the CP renewal is; Mrs. Seda ATABEK as the Team Leader and Mr. Sandeep KANDA as the ITR.

The following actions were involved in the desk review:

- A review of the data and information presented to verify their completeness
- A review of the monitoring plan and monitoring methodology, paying particular attention to the frequency of measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures
- An evaluation of data management and the quality assurance and quality control system in the context of their influence on the generation and reporting of emission reductions

A list of all the documents that were reviewed can be found in Section 6 of this verification report.

### 3.4. On-Site Visits

As a part of the verification activities a physical site visit was performed at the project activity’s site, details of which can be seen in Table 3-4 below:

**Table 3-4: Site visit details**

<b>Date</b>	13/12/2023	
<b>Location</b>	Silivri/İstanbul	
<b>Participant</b>	<b>Company Name</b>	<b>Role in the Organization / Role in the Site Visit</b>
İrem TAŞKIRAN	Re-carbon	Team Leader
Mustafa HASANOĞLU	Kurfallı Village	Male Resident
Yılmaz SÜTÇÜ	Kurfallı Village	Mukhtar (Headman)
Osman Nuri ÇORAKLI	Eksim Enerji	Command Operator
Erkan ÇELİK	Eksim Enerji	Turbine Technician
Olcay YILDIZ	Eksim Enerji	Turbine Technician (local from Fenerköy)
Murat VARDAR	Eksim Enerji	Turbine Technician
Yüce Can YILMAZ	Eksim Enerji	Energy Trading Expert
Taner AKKAN	Eksim Enerji	Business Manager of Silivri WPP (assigned technician for monitoring “biodiversity” parameter)
<b>Points Verified</b>		<b>Source of Information</b>
Implementation and operation of the proposed CDM project activity as per the registered PDD		Document review, on-site visit and interviews with the local stakeholders from Kurfallı Village
Review of information flows for generating, aggregating and reporting the monitoring parameters		Document review, on-site visit and interviews with the local stakeholders from Kurfallı Village
Interviews with relevant personnel to confirm that the operational and data collection procedures are implemented in accordance with the monitoring plan in the PDD		Interviews with the relevant personnel from Eksim Enerji
Cross-check between information provided in the monitoring report and data from other sources such as plant log books, inventories, purchase records or similar data sources		Document review and on-site visit

Check of the monitoring equipment including calibration performance and observations of monitoring practices against the requirements of the PDD and the selected methodology	Document review, on-site visit and interviews with the local stakeholders from Kurfallı Village
Review of calculations and assumptions made in determining the GHG data and emission reductions	Document review
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	Document review and interviews with the local stakeholders from Kurfallı Village

During the physical site visit, the logbook was seen and there were no complaints. Also, local people of the Kurfallı Village were interviewed, and it was stated that there were no complaints from the local stakeholders and headman of the Kurfallı Village. Logbook was located in the office of the headman of Fenerköy village.

### 3.5. Reporting of Findings via the Verification Protocol

During the verification period, a Verification Protocol (attached as Annex 1 to this verification report) was used to submit the findings to the project developers.

As part of this verification report, please see “**Attachment to Verification Report / GS4GG Audit Techniques Template for Verification**” for details of Audit Techniques used and the related risk assessment.

In line with the CDM Validation and Verification Standard the team reports the non-conformities in form of Corrective Action Requests (CARs), Clarification Requests (CLs) and Forward Action Requests (FARs). When and for which type of non-conformities CARs, CLs and FARs are issued is explained below:

- The Verification team raises a **CAR** if one of the following occurs:
  - A non-conformity with the monitoring plan or methodology is found in the monitoring and reporting, or if the evidence provided to prove conformity is insufficient.
  - Mistakes have been made in applying assumptions, data or calculations of emission reductions that will impair the estimate of emission reductions.
  - Issues identified in a FAR during validation to be verified during verification have not been resolved by the project developers.
- The Verification team raises a **CL** if information is insufficient, not transparent, or not clear enough to determine whether the applicable CDM and/or GS4GG requirements have been met.

- The Verification team raises a **FAR** during the verification for actions if the monitoring and reporting require attention and/or adjustment for the next verification period.

According to these principles, a total of 23 CARs, 00 CLs and 00 FARs were issued, all of which are listed in the Verification Protocol.

### **3.6. Follow-Up Interviews**

During the verification period, follow-up interviews were performed by the verification team in order to further analyze the correctness and accurateness of the information provided. A list of individuals interviewed is given in Section 5 of this Verification Report.

### **3.7. Resolution of Outstanding Issues**

During the verification activity, CARs and CLs were issued to clarify the issues that are not sufficiently transparent to reach a positive verification opinion and to approve the achieved GHG emission reductions.

If there are any findings issued as Forward Action Requests (FARs) previously, as indicated in earlier validation and/or verification reports, these are also addressed in this phase.

Outstanding issues indicated in the FARs from earlier reports, and CLs and CARs from this verification activity, were resolved and/ or clarified during the written and oral communications between the Project Developer and Re Carbon Ltd.'s Verification Team Members. These communications are backed up with objective evidence that were sent to the verification team as a proof of compliance. Concerns issued in the desk review, the on-site audit assessments, the follow up interviews and the responses provided for the issued concerns are documented in Annex 1 (Verification Protocol) in order to guarantee the transparency of the verification process.

The verification timeframe is given in detail in Table 3-5 below:

**Table 3-5: Verification Timeframe**

Activity	Timeline		Total Days
	From	To	
Desk Review	7.12.2023	15.10.2024	314
Review of the MR version 01	7.12.2023	7.02.2024	63
Site Visit	13.12.2023	13.12.2024	367
Issuance of the Verification Protocol version 01	5.02.2024	7.02.2024	3
Review of PDs Initial Set of Responses	7.02.2024	19.07.2024	164
Issuance of the Verification Protocol version 02	19.07.2024	22.07.2024	4
Review of PDs Second Loop Responses	22.07.2024	2.10.2024	73
Closing of all the CARs and CLs	5.10.2024	5.10.2024	1
Issuance of the Verification Report version 01	15.10.2024	15.10.2024	1
ITR Process	15.10.2024	28.11.2024	45
Issuance of the Verification Report version 02	27.11.2024	27.11.2024	1
Submission for Final Approval	28.11.2024	28.11.2024	1
Submission to the PD	28.11.2024	28.11.2024	1
Revisions based on GS review comments round 1	15.02.2025	17.02.2025	3

Information or clarifications provided as a response to a CAR, CL or FAR could also lead to a new request. This can also be seen transparently in the Verification Protocol provided in Annex 1 of this Verification Report.

### 3.8. Internal Quality Control

As a final step of verification, the final documentation including the verification report and its annexes must undergo an internal quality control in Re Carbon Ltd. This quality control is also referred to as the “Independent Technical Review” process.

The Independent Technical Review is performed by another Team Leader who was not involved in the verification activity of this project activity. Following finalization of the Verification Report by the Team Leader, the draft report is sent to the Independent Technical Reviewer. At this stage not only the report but all the supporting documents, such as emission factor calculations, additionality justifications, relevant excel sheets etc. are being reviewed.

Further CLs and CARs can be issued by the Independent Technical Reviewer during this review to cover all aspects that may need further clarification.

After all the CLs and CARs are closed, the verification report is reviewed and approved by the Team Leader, ITR and the Certification Manager. The request of issuance is submitted to the

Project Developer in line with the positive verification opinion and along with all relevant documents.

## 4. VERIFICATION FINDINGS

### 4.1. Remaining Issues from Previous Validation or Verifications

There are 3 FARs issued during the design renewal process from GS design renewal review:

FAR#1: Remote Site Visit of VVB shall be resumed when Covid-19 situation eases.

Response to FAR# 1: Physical on-site visit was conducted on 13/12/2023 which is in line with GS4GG site visit requirements.

FAR#2: Last verification and design renewal validation has been conducted by the same VVB. In case of next verification to be performed by ReCarbon as well, VVB shall consider the GS rule update of Validation and Verification by the same VVB.

Response to FAR# 2: Re-carbon has conducted the crediting period renewal process and doing the 1<sup>st</sup> verification of 2<sup>nd</sup> crediting period as well. Team of the CP renewal is; Mrs. Seda ATABEK as the Team Leader and Mr. Sandeep KANDA as the ITR. Team of the 1<sup>st</sup> verification of 2<sup>nd</sup> CP is; Ms. İrem TAŞKIRAN as the Current Team Leader, Ms. Selen CİLASUN as the Previous Team Leader and Mr. Rohit BADAYA as the ITR.

FAR#3: Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle. Thus, PD can only claim realized ER from 12 Aug 2021 in CP2.

Response to FAR#3: This is 1<sup>st</sup> verification of 2<sup>nd</sup> crediting period. Monitoring period is between 20/08/2021 to 30/11/2023 which is after 12/08/2021.

There are 3 FARs issued during the previous performance review of 1<sup>st</sup> CP:

FAR#1: On-site Audit shall be resumed by VVB when Covid situation eases.

Response to FAR# 1: On-site audit has been conducted on 13/12/2023.

FAR#2: Next Verifying VVB shall consider Rule Clarification dated 04/07/2022, "Assessment Approach for Reporting Higher Ex-post Emission Reductions" in case of Increase In realized energy generation and claimed ERs. As per paras 2.1.3 and 2.1.4, the ERs will be capped by the upper bound of the sensitivity analysis range for MP. As per para 2.1.5, If higher emission reductions reported due to the same cause consecutively, further analysis shall be conducted.

Response to FAR# 2: Emission reductions have been limited to the maximum threshold within the sensitivity analysis range for MP.

FAR#3: During next CP, regular carcass/nest observation activities on site shall be performed and recorded.

Response to FAR#3: VVB has been verified the regular carcass/nest observation records and interviewed the responsible personnel (Taner AKKAN) on physical-site audit.

#### **4.2. Compliance of the Project Implementation with the Registered PDD**

The project is fully implemented according to the description presented in the registered PDD version 10, dated 06/09/2023 and 23 wind turbines (including 18 registered wind turbines) were operational during the on-site visit as in the registered project. The verification team confirms through the site visit inspection and provided evidences that all physical features of the project activity including data collecting systems and storage have been implemented in accordance with the registered PDD. Electricity meters were also seen during the on-site visit. The project activity is completely operational and the same has been confirmed through on-site visit. The project start date is 20/08/2014 which was confirmed from first acceptance protocol of 10 turbines.

- **The commissioning date of the 1<sup>st</sup> phase turbines (10 Turbines): 20/08/2014**
- **The commissioning date of the 2<sup>nd</sup> phase turbines (5 Turbines): 04/09/2014**
- **The commissioning date of the 3<sup>rd</sup> phase turbines (3 Turbines): 19/09/2014**
- **The commissioning date of the 4<sup>th</sup> phase turbines (2 Turbines): 11/01/2019**
- **The commissioning date of the 5<sup>th</sup> phase turbines (3 Turbines): 25/10/2019**

This date is also confirmed by checking the provisional acceptance protocols of the wind turbines.

According to the registered PDD, the estimated annual emission reduction is 88,834 tCO<sub>2</sub>e and corresponding total estimated amount for the monitoring period is 202,736 tCO<sub>2</sub>e. The actual values achieved for the current monitoring period is 234,423 tCO<sub>2</sub>e but the difference between the realized and estimated emission reductions during the monitoring period has been addressed by capping the emission reductions at 223,009 tCO<sub>2</sub>, in line with the Assessment Approach for Reporting Higher Ex-Post Emission Reductions. A 20% reduction was applied therefore emission reduction have been limited to 10% increase. The actual amount of emission reduction for the current monitoring period is 15.6% higher than estimated emission reduction amount but with capping the emission reductions, emission reduction for the current monitoring period is 10% more than the estimated. With considering the yearly fluctuations in wind, high uncertainty for wind speed estimation and possible increase and decrease in the electricity generation during the long-life time of the project, the average increase throughout the monitoring period as 10% is deemed acceptable.

The difference in the values does not lead to a substantial increment of the ER in this period in relation to the estimates in the registered PDD. The technical specifications of the wind turbines

are confirmed by looking at the provisional acceptance protocols of turbines and Nordex website.

### **4.3. Compliance of the Monitoring Plan with the Monitoring Methodology**

The monitoring plan is in accordance with the approved methodology, ACM0002 version 20.0, applied by the project activity.

In line with the methodology, the only information to be monitored is the amount of net electricity delivered to the grid by the project activity.

### **4.4. Compliance of the Monitoring with the Registered Monitoring Plan**

The net electricity is measured continuously by one main electricity meter at the grid interface and recorded monthly. There is also one back-up electricity meter. The meters used are in line with the regulatory requirements for electricity meters. On 16/08/2021, main meter and back-up meters have been changed.

The technical details of the current electricity meters are as follows:

	<b>Main Meter</b>	<b>Back-up Meter</b>
Manufacturer	EMH	EMH
Model	LZQJ-XC-P2FB	LZQJ-XC-P2FB
Serial Number	11590270	11590284
Date of Installation	16/08/2022	16/08/2022
Date of Initial Calibration	16/08/2022	16/08/2022
Accuracy class	0.2s	0.2s

The installation documents of the electricity meters dated 16/08/2022 for main meter and for back-up meter (i.e. the meter change date) and initial calibrations of the documents of the electricity meters dated 16/08/2022 for main meter for back-up meter were provided by the project owner.

The electricity meters have been controlled and maintained by the grid owner. The quantity of net electricity delivered to the grid has been taken from EPIAŞ monthly electricity meter readings. The net electricity generation has been measured from the EPIAŞ monthly electricity meter readings (and cross-checked with OSF records) and measuring the difference between registered and unregistered turbines. Also, for August 2021, daily calculation has been done for electricity generation.

Data has been stored electronically, during the crediting period and at least two years after the last issuance of credits for the wind farm project activity in the concerning crediting period. The project participants also archived a hardcopy of meter reading protocols, scanned them, and stored them. The invoices are kept by the Project owner as hardcopies. Furthermore, the EPIAS

system stores the reports electronically, which is accessible to the Project owner whenever necessary.

Moreover, the details of the ex-ante parameter were confirmed with checking the registered PDD version 10, dated 06/09/2023 of the project activity.

#### **4.5. Completeness of Monitoring**

All parameters required by the methodology and Gold Standard are monitored. In line with the methodology, the only information to be monitored is the amount of net electricity exported to the grid by the project activity. The sustainable development goal (SDG) data/parameters indicated in the registered PDD relevant for the 1<sup>st</sup> verification of 2<sup>nd</sup> CP are:

- $EG_{pj,grid,y}$  (SDG 7, Indicator 7.2.1)
- $ER_y$  (SDG 13, Indicator 13.3.2)
- Number of Employment (SDG 8, Indicator 8.5.2)
- Number of employees to be trained for the construction and operation of the plant / Fair wage, working hours and occupational injuries (SDG 8, Indicator 8.8)

**Table 4-1:** Sustainable Development Contributions

Sustainable development goals targeted	Chosen Data / Parameter	Way of Monitoring (When)	Compliance check
SDG 13, Indicator 13.3.2	$ER_y$	Checking monthly EPIAŞ meter readings	The net electricity generation has been checked from the monthly EPIAŞ electricity meter readings (and cross-checked with OSFS records). The details of the electricity generation are provided in Section 4.8 of this verification report. The electricity values have been multiplied by the ex-ante emission factor of 0.6198 tCO <sub>2</sub> /MWh.
SDG 7, Indicator 7.2.1	$EG_{pj,grid,y}$	Checking monthly EPIAŞ meter readings	The net electricity generation has been checked from the monthly EPIAŞ electricity meter readings (and cross-checked with OSF records) and checking the difference of electricity generation between registered and unregistered turbines from SCADA system. Therefore, a calculation has been introduced to calculate the generated electricity of 45 MWe. During the monitoring of net energy generation (SDG7) value calculation, PP has simply subtracted the SCADA values of unregistered 5 turbines' electricity generation from all 18 turbines gross generation data of EPIAS. In this way, PP found a registered production of 45 MW from 18 turbines. Also, for August 2021, to calculate the electricity generation value, daily production for 20/08/2021 to 31/08/2021 has been calculated from EPIAŞ meter reading. The details of the electricity generation are provided in Section 4.8 of this verification report.

SDG 8, Indicator 8.5.2	Number of Employment	Checking social security records of the employees	Social security records of 17 employees were provided to the VVB. 9 of the employees are local.
SDG 8, Indicator 8.8	Number of employees to be trained for the construction and operation of the plant / Fair wage, working hours and occupational injuries	Checking the training and social security records	The training records of the employees dated 11/08/2021, 28/06/2022, 06/10/2022, 24/01/2022, 13/02/2023, 14/02/2023 and 26/04/2023 were provided to the VVB. Also, it was learned from the employees during the on-site visit that there have been no occupational injuries during the current monitoring period (20/08/2021 – 30/11/2023). Employees are satisfied for taking health and safety trainings every year.

The project contributes to SDG 7 (Affordable and Clean Energy with 378,227.25 MWh net electricity generation), SDG 8 (Decent Work and Economic Growth with total 17 employed staff during the recent year of operation period and there are several training records which are indicated above), SDG-13 (Climate Action with achieved emission reduction of 223,009<sup>6</sup> tCO<sub>2</sub>e) during the monitoring period.

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

#### **4.6. GS4GG Safeguarding Principles and Requirements**

Safeguarding Principles and Requirements are in line with the registered PDD and the final version of the Gold Standard for the Global Goals. For the verification of Safeguarding Principles and Requirements in the current monitoring period, document review, on-site visit observations and on-site interviews with local stakeholders were used.

Compliance check of the Data / Parameter(s) indicated in the Safeguarding Principles Monitoring Plan of the registered PDD has been carried out as described in Table 4-2 below:

<sup>6</sup> The emission reductions have been capped to the upper bound of the sensitivity analysis range (The emission reductions have been capped to 10% upper limit of amount estimated ex ante deducted) for the monitoring period as per Rule Clarification -ASSESSMENT APPROACH FOR REPORTING HIGHER EX-POST EMISSION REDUCTIONS.

**Table 4-2: Safeguarding Principles**

<b>Principle #</b>	<b>Safeguarding Principle</b>	<b>Means of Verification</b>	<b>Compliance Check</b>
Hazardous and Non hazardous Waste (Principle 9.5)	Waste Oil Disposal	Amount of waste oil to be discharged to the environment	Waste oil from equipment is collected in an oil-proof container and disposed via third party companies which are properly in line with the relevant regulation. The hazardous waste disposal records of 2021, 2022 and 2023 were provided to the VVB.
Endangered Species (Principle 9.11)	Biodiversity	Number of bird and bat strikes to the turbines	During the on-site visit dated 13/12/2023, the logbook for bird/bat nests and carcasses has been checked and there was no problem. Also, the employees were interviewed about this subject. No negative comments were received from them. No harm has been occurred.
Release of pollutants (Principle 9.4)	Waste water disposal	Amount of wastewater to be discharged to the environment	With evidence documents, a septic tank for collection of waste water have been checked. The sewage is transferred by sewage truck to the municipality sewage system as per the “Regulation on Control of Water Contamination”. The wastewater transfer receipts dated 27/09/2021, 07/12/2021, 17/03/2022,26/06/2022, 26/08/2022, 27/03/2023, 11/07/2023, 25/09/2023

Principle #	Safeguarding Principle	Means of Verification	Compliance Check
			<p>and 20/10/2023 were provided to VVB. Project discharged 9,953,489 m<sup>3</sup> wastewater to the environment during this monitoring period. And this corresponds to 4,361,373 per year.</p>
<p>Sites of Cultural and Historical Heritage (Principle 4.1)</p>	<p>Impact on objects or structures of significant cultural heritage</p>	<p>Advocates the avoidance of inappropriate alteration, damage, disruption, or removal of artifacts and objects of cultural, archaeological value</p>	<p>During the on-site visit conducted on 13/12/2023, it was observed that the project has not caused any damage or negative impact on cultural or archaeological values. No harm has occurred to the archaeological site. The verification process included a physical inspection of the site to ensure that no construction activities, land disturbances, or other project-related actions have affected the integrity of the archaeological area. Additionally, discussions with relevant stakeholders and a review of available documentation confirmed that the site remains preserved and unaffected by the project activities.</p>
<p>Release of pollutants (Principle 9.4)</p>	<p>Air Quality</p>	<p>Reduction in amount of NMVOC and CO emissions</p>	<p>The net electricity generation has been checked from the EPIAŞ records and the emission intensities of NMVOC and CO emissions due to</p>

Principle #	Safeguarding Principle	Means of Verification	Compliance Check
			electricity generation are taken as: 0.034 t/GWh and 0.160 t/GWh respectively, as fixed ex-ante in the registered PDD. Therefore, total of 12.94 tons of NMVOC and 60.59 tons of CO emission reduction (avoidance) has been achieved during this monitoring period in line with the provided and checked calculation.

Applied GS4GG activity and product requirements for this project is listed in below:

- Projects has made positive contributions to a minimum of three Sustainable Development Goals which are SDG 7, SDG 8 and SDG 13.
- Projects has been appointed an eligible GS VVB, which is Re-carbon Ltd, to conduct the verification of Renewable Energy Label Projects.
- Projects seeking issuance of both Gold Standard VERs and Gold Standard Renewable Energy Labels has been verified concurrently by same GS VVB, which is Re-carbon Ltd.
- Projects has included, within the Monitoring Report, the reporting of MWh generated and supplied to the grid (including evidence from the grid regulator).

According to GHG Emissions Reduction & Sequestration Product Requirements para 4:

- Only Carbon Dioxide (CO<sub>2</sub>), Methane (CH<sub>4</sub>) and/or Nitrous Oxide (N<sub>2</sub>O) are eligible for GSVERs or GSCERs, provided Projects comply with all GS4GG Requirements and eligibility criteria. Silivri WPP project is only doing reduction for only Carbon Dioxide (CO<sub>2</sub>), so this project is eligible for GS4GG activity and product requirements.
- Projects involving the reduction of eligible and non-eligible greenhouse gases (GHGs) shall be eligible for the crediting of emission reductions associated with eligible GHGs only. This project is only doing reduction for only Carbon Dioxide (CO<sub>2</sub>), so this project is eligible for GS4GG activity and product requirements.

According to Renewable Energy Activity Requirements para 2.1.2:

- In order to be eligible for Gold Standard certification, all Renewable Energy Projects, shall meet the following Eligibility Criteria:
  - a. Projects shall generate and deliver energy services (e.g., mechanical work/electricity/heat) from non-fossil fuel and renewable energy sources. This project is

generating electricity from wind energy which is non-fossil fuel energy type, so this condition is applicable for this project.

- b. Projects shall comprise of renewable energy generation units, such as solar photovoltaic, tidal/wave, wind, hydro, geothermal, waste to energy and renewable biomass, that are:
- Supplying energy to a national or a regional grid;
- OR
- Supplying energy to an identified consumer facility via national/regional grid through a contractual agreement such as wheeling. This project is physically connected to Turkish National Grid and comprise of renewable energy generation units from wind energy. So, this condition is applicable.
- c. Any Project supplying electricity to a mini-grid<sup>1</sup> shall refer to Community Services Activity Requirements. This project is supplying electricity to Turkish National Grid so this condition is not applicable.
- d. Projects generating on-site energy for captive consumption at an industrial facility shall refer to the requirements in this document. This project is generating on-site energy for captive consumption at an industrial facility, so this is applicable.

Therefore, it is concluded by the verification team that this project is complying to the GS4GG activity and product requirements as described above.

#### **4.7. Compliance with the Calibration Frequency Requirements for Measuring Instruments**

Although, re-calibration is required after ten years<sup>7</sup>, 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 electricity meters were changed on 16/08/2022. The technical details of the old electricity meters are as follows:

Old Meters:

	<b>Primary Meter</b>	<b>Secondary Meter</b>
<b>Brand/Model</b>	EMH	EMH
<b>Serial Number</b>	4241393	4241394
<b>Accuracy of Meters</b>	0.2S	0.2S

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<sup>7</sup> <https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=6381&MevzuatTur=7&MevzuatTertip=5>

The technical details of the current electricity meters are as follows:

Current Meters:

	<b>Primary Meter</b>	<b>Secondary Meter</b>
<b>Brand/Model</b>	EMH	EMH
<b>Serial Number</b>	11590270	11590284
<b>First Index Date</b>	16/08/2022	16/08/2022
<b>Accuracy of Meters</b>	0.2S	0.2S

The calibration document (i.e. meter change protocol) dated 16/08/2022 has been provided by the project owner. The technical features of the electricity meters were confirmed by the verification team via these documents.

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.

#### **4.8. Assessment of Data and Calculation of Emission Reductions**

EPIAS records and OSF forms have been presented to the VVB for all months of the monitoring period. All EPIAS records have been checked for the electricity generation values. EPIAS records are used as the source of net generated electricity value and meter reading forms or OSF forms issued by TEIAS are used for the crosscheck. The net electricity generated during the current monitoring period was as follows in Table 4-3 below:

**Table 4-3: Net Electricity Generation Values**

<b>Period</b>	<b>Amount</b>	<b>Compliance check</b>
20/08/2021 - 31/12/2021)	Export to Grid: 96,584.08 MWh Import from Grid: 50.05 MWh Net electricity supplied to grid: 96,534.03 MWh Adjusted net electricity supplied to grid: 65,825.35 MWh (Considering GS registered capacity of the project (45 MW) and excluding the electricity generation of the added five turbines)	Monthly EPIAS records with subtracting the unregistered 5 turbine's generation

Period	Amount	Compliance check
01/01/2022 - 31/12/2022	Export to Grid: 229,491.67 MWh Import from Grid: 143.32 MWh Net electricity supplied to grid: 229,348.35 MWh Adjusted net electricity supplied to grid: 160,296.78 MWh (Considering GS registered capacity of the project (45 MW) and excluding the electricity generation of the added five turbines)	Monthly EPIAŞ records with subtracting the unregistered 5 turbine's generation
01/01/2023 - 30/11/2023	Export to Grid: 217,687.15 MWh Import from Grid: 138.00 MWh Net electricity supplied to grid: 217,549.15 MWh Adjusted net electricity supplied to grid: 152,105.12 MWh (Considering GS registered capacity of the project (45 MW) and excluding the electricity generation of the added five turbines)	Monthly EPIAŞ records with subtracting the unregistered 5 turbine's generation
Total (20/08/2021 – 30/11/2023)	Export to Grid: 543,762.90 MWh Import from Grid: 331.37 MWh Net electricity supplied to grid: 543,431.54 MWh Adjusted net electricity supplied to grid: 378,227.25 MWh (Considering GS registered capacity of the project (45 MW) and excluding the electricity generation of the added five turbines)	Monthly EPIAŞ records with subtracting the unregistered 5 turbine's generation

VVB confirms that the data used for emission reductions are correct. The grid emission factor taken is 0.6198 tCO<sub>2</sub>/MWh and the value is same as fixed ex-ante in the registered PDD. VVB also confirms that the methods and formulae used for calculating baseline emissions are in line with the methodology and the registered PDD. To accurately determine the actual values associated with the registered capacity, the generation from the additional turbines, as recorded by the SCADA system, will be subtracted from the total generation tracked in the EPIAS records. After this deduction, the remaining amount (the adjusted net electricity supplied to the grid) will represent the generation from the registered capacity. This value will be calculated as follows:

$$\text{Adjusted net electricity supplied to the grid} = \text{Total Generation (EGPJ,y)} - \text{Generation from Added Capacity (as recorded by the SCADA system)}$$

The net electricity generation is multiplied with the grid emission factor to arrive at the emission reductions. The grid emission factor and data and parameters available before validation are also applied in line with the registered PDD.

Furthermore, double counting issue has also been assessed and the verification team has also checked the I-REC Registry (<https://evident.services/device-register>) and this project is not available within I-REC Registry database. Similarly, VCS project database (<http://vcsprojectdatabase.org/#/home>) and GCC project database ([https://projects.globalcarboncouncil.com/pages/submitted\\_projects](https://projects.globalcarboncouncil.com/pages/submitted_projects)) were checked and this project is not available within VCS and GCC projects' databases, either. Given that CDM projects are not applicable in Turkey and the project does not appear on domestic REC scheme, I-REC, VCS and GCC registries, it could be confirmed that no RECs and other VER carbon credits are being issued for the project at the time of this verification.

#### 4.9. Quality of Evidence

According to the PDD, the estimated emission reduction for this monitoring period would be 202,736 tCO<sub>2</sub>e corresponding to the monitoring period. The project in operation totally reached 234,423 tCO<sub>2</sub>e in this period, however, emission reductions have been capped to 223,009<sup>8</sup> as per the Assessment Approach For Reporting Higher Ex-Post Emission Reductions.

The vintage break-up of the emission reductions during the current monitoring period was as follows in Table 4-4 below:

**Table 4-4:** Emission Reduction Values

Period	Emission reductions (tCO <sub>2</sub> e)	Capped Emission reductions (tCO <sub>2</sub> e)
20/08/2021 -31/12/2021	40,798	35,874
01/01/2022 -31/12/2022	99,351	97,717
01/01/2023 -30/11/2023	94,274	89,418
Total (20/08/2021 – 30/11/2023)	234,423	223,009

Calculations have been reproduced by the VVB and the source data (monthly EPIAŞ meter readings) are presented by the PP. PP can only claim ERs between 20/08/2021 to 30/11/2023 for this monitoring period. Calculations have been reproduced by the VVB and the source data (monthly EPIAŞ meter readings) are presented by the PP.

#### 4.10. Management System and Quality Assurance

There are two electricity meters as one main and one back up meter attached to the power plant for measurement of the generated electricity which were installed to the plant. The meters used

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<sup>8</sup> The emission reductions have been capped to the upper bound of the sensitivity analysis range (The emission reductions have been capped to 10% upper limit of amount estimated ex ante deducted) for the monitoring period as per Rule Clarification -ASSESSMENT APPROACH FOR REPORTING HIGHER EX-POST EMISSION REDUCTIONS.

in the power house are in line with the Energy Market Regulatory Authority (EMRA) requirements for the electricity meters. Both these meters are bi-directional (meter the energy in two directions – consumption and production). If there is a measuring difference between these two meters and one of the parties (EPIAŞ or the PP) requests for calibration of the meters, in this case, the meters will be calibrated without waiting for the periodical check. This calibration process is made by an accredited party under the control of EPIAŞ and the PP is not responsible for calibration of the meters in Turkey according to the local standards and requirements.

#### **4.11. Materiality**

Verification VVB checked all data set (EPIAS records August 2021-October 2023) and each day of production is included in these readings. These readings are exact and are the basis for billing. They are recorded and saved automatically by the relevant government authority and there is no base for any option of material information.

Materiality threshold of the project is 2% of emission reductions since this project is large scale and achieved a total emission reduction of less than 300,000 tons of carbon dioxide.

Level of materiality is ensured by application of “Guideline on the Application of Materiality in Verifications” version 02. To guarantee this level of assurance all data that is used in the GHG emission reduction calculations have been reviewed without any sampling.

The verification team confirms that the claimed emission reductions for Silivri WPP are free from material errors, with a reasonable level of assurance. The baseline scenario, data accuracy, and emission reduction calculations were reviewed and found to align with Gold Standard rules and requirements. All data sources, including monitoring records and grid emission factors, were verified as reliable, and no significant discrepancies were identified. Any minor deviations were within the allowable materiality thresholds. The project adhered to its monitoring plan and Gold Standard requirements, and the emission reductions were validated as accurate and credible.

#### **4.12. Verification of Sampling Plan**

N/A

#### **4.13. Post Registration Changes**

##### **4.13.1. Temporary deviations**

N/A

##### **4.13.2. Corrections**

N/A

##### **4.13.3. Changes to the start date of the crediting period**

N/A

**4.13.4. Permanent changes**

N/A

**4.13.5. Changes to the project design**

N/A

## 5. LIST OF INDIVIDUALS INTERVIEWED

During the site visit an arrangement was made to meet relevant stakeholders such as personnel with knowledge of the activity design and implementation and other local stakeholders who are affected by the implementation of the project to perform the interviews. Before the beginning of these interviews each interviewee was informed that their name and general information will be shared in this public report only if their consent is provided. A confidential document is the attachment of this report for the full list of interviewees.

The list of individuals who were interviewed during the verification period is given in Table 5-1 below:

**Table 5-1:** List of individuals interviewed (with name and general information if consent is provided by interviewees<sup>9</sup>)

Reference Number	Means of Interview <sup>10</sup>	Full Name	Title	Organization
I01	SV	Mustafa HASANOĞLU	Male Resident	Kurfallı Village
I02	SV	Yılmaz SÜTÇÜ	Mukhtar (Headman)	Kurfallı Village
I03	SV	Osman Nuri ÇORAKLI	Command Operator	Eksim Enerji
I04	SV	Erkan ÇELİK	Turbine Technician	Eksim Enerji
I05	SV	Olca YILDIZ	Turbine Technician	Eksim Enerji
I06	SV	Murat VARDAR	Turbine Technician	Eksim Enerji
I07	SV	Yüce Can YILMAZ	Energy Trading Expert	Eksim Enerji
I08	SV	Taner AKKAN	Business Manager of Silivri WPP	Eksim Enerji

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<sup>9</sup> If interviewee doesn't provide consent to disclose the name in public document, the Re Carbon will include an annex (separate document "Re Carbon Site Visit Attendance Form") with interviewees detail marked clearly that document is confidential and shall not be made public.

<sup>10</sup> SV: Site visit; T: Telephone; EM: E-mail

## 6. LIST OF DOCUMENTS REVIEWED

The list of the documents which were reviewed during the verification period is given in Table 6-1 below:

**Table 6-1:** List of documents reviewed

Document Number	Document Name	Version	Date (dd/mm/yyyy)
D01	Monitoring Report	1	06/12/2023
D02	Monitoring Report	2	19/07/2024
D03	Monitoring Report	3	01/10/2024
D04	ER Excel Sheet	1	06/12/2023
D05	ER Excel Sheet	2	19/07/2024
D06	ER Excel Sheet	3	01/10/2024
D07	EPIAŞ Records	-	08/2021-10/2023
D08	SCADA Records	-	08/2021-10/2023
D09	PDD of 2 <sup>nd</sup> CP	10	06/09/2023
D10	Waste Water Disposal Records	-	27/09/2021, 07/12/2021, 17/03/2022,26/06/2022, 26/08/2022, 27/03/2023, 11/07/2023, 25/09/2023, 20/10/2023
D11	Waste Oil Disposal Records	-	2021-2023
D12	Meter First Index Protocols (Meter Change)	-	16/08/2022
D13	Social Security Records	-	2021-2023
D14	Training Records	-	11/08/2021, 28/06/2022, 06/10/2022, 24/01/2022, 13-14/02/2023, 26/04/2023
D15	Generation License	-	31/03/2017
D16	Declaration for Double Counting, Legal Dispute	-	28/08/2024
D17	Declaration from Mukhtar for Grievance	-	28/08/2024
D18	Photographic Evidence of Compliance and Grievance Mechanism Notebook	-	28/08/2024
D19	EIA Not Required Report		11/06/2009

Document Number	Document Name	Version	Date (dd/mm/yyyy)
D20	Validation Report of 2 <sup>nd</sup> CP	05	26/09/2023
D21	Provisional Acceptance Protocols	-	20/08/2014 04/09/2014 19/09/2014 11/01/2019 25/10/2019
D22	KMZ Document	-	07/12/2023
D23	ACM0002: Grid-connected electricity generation from renewable sources	20	28/09/2019
D24	Annual Report	-	17/12/2023
D25	Ornithology Reports	-	2021-2023
D26	Design Renewal Review	-	10/10/2023
D27	Monitoring Report	4	20/11/2024
D28	Registered IRR	-	15/11/2019
D29	Monitoring Report	5	03/02/2025
D30	ER Excel Sheet	4	03/02/2025

## 7. VERIFICATION TEAM AND ITR COMPETENCE

**Ms. İrem Taşkiran** holds a B. Sc. in “Energy Systems Engineering” from Ankara Yıldırım Beyazıt University. With re-carbon, İrem is an internal Team Leader and a Technical Expert for Project-Level Group 1 - GHG Project Type: Renewable Energy Production. Furthermore, İrem is a Regional Expert for Türkiye. Currently İrem undergoes a training program for Project-Level Group 1 - GHG Project Type: Energy Efficiency Improvements.

**Mr. Rohit Badaya** holds a Master’s degree in “Nanotechnology” and a Bachelor’s degree in “Pulp and Paper Engineering” from the Indian Institute of Technology Roorkee (IIT Roorkee). He is also an Energy Auditor, certified by the Bureau of Energy Efficiency, Ministry of Power, Govt. of India. Rohit has more than 14 years of work experience in the area of Climate Change (CDM, GS, VCS, GCC) and has worked for various DOEs/VVBs in the capacity of Team Leader, Validator/Verifier, Technical Expert, ITR, Manager (Technical & Certification) and Quality Manager. Within the context of CDM/GS/VCS/GCC, Rohit has a record of accomplishment of more than 200 projects as Team Leader, Validator, Verifier, Technical Expert and Technical Reviewer. He is well versed with various local regulations related to CDM/GS/VCS/ GCC projects, located in countries in Asia, Africa, Middle East, Asia Pacific as well as in Türkiye. With re-carbon, Rohit is a free-lance Team Leader, ITR and an expert in Project-Level Group 1 - GHG Project Types: Renewable Energy Production & Energy Efficiency Improvements // Project-Level Group 5 - GHG Project Types: Methane collection & destruction as well as Livestock and other anaerobic digester operations // Project-Level Group 6 - GHG Project Types: Capture & destruction of Landfill gas & Capture & use of Landfill gas & Avoidance of methane production in wastewater treatment. Rohit is also a Regional Expert for Bhutan, Brazil, Cambodia, Chile, Democratic Republic of Congo, Egypt, El Salvador, Ethiopia, The Gambia, India, Indonesia, Iran, Kenya, Madagascar, Malawi, Mauritius, Mexico, Morocco, Myanmar, Nepal, Nicaragua, Nigeria, Papua New Guinea (PNG), Republic of Madagascar, Senegal, South Africa, Sri Lanka, Thailand, Türkiye, Uganda, Vietnam and Zambia.

**Ms. Selen Cilasun** holds a B.Sc. and a M.Sc. Degree in “Bioengineering”. With re-carbon, Selen is an internal Team Leader, a Technical Expert for Project-Level Group 1 - GHG Project Type: Renewable Energy Production and a Regional Expert for Türkiye. Selen is also a Trainee for Project-Level Group 5 - GHG Project Types: Methane collection & destruction as well as Livestock and other anaerobic digester operations // Project-Level Group 6 - GHG Project Types: Capture & destruction of Landfill gas & Capture & use of Landfill gas & Avoidance of methane production in wastewater treatment.



# CERTIFICATE OF APPOINTMENT



Within the scope and in strict accordance to the appointments indicated below, the bearer may:

- Participate in assessments conducted by re-carbon Ltd.
- Take the appointed positions within and outside of an assessment team
- Bring specific expertise to assessments

This Certificate of Appointment is valid unless there are changes in the related requirements for the qualification and appointment and/or the personnel's work agreement is terminated. There is no defined validity period for this Certificate. However, The Certificate may be updated, suspended or cancelled at any time, as a result of performance assessments and/or other reasons as defined above.



This Certificate of Appointment is given to

**Mr. Rohit Badaya**

as a confirmation of compliance with re-carbon's internal qualification requirements for the following positions:

This Appointment Certificate is granted on the date of **27.03.2024** by

**Christian Johannes**  
(General Manager)



PROJECT LEVEL GROUP	GHG PROJECT TYPE EXPERTISE	SUPPORTING CORE TECHNICAL AREA EXPERTISE	GOLD STANDARD					VERIFIED CARBON STANDARD					CERCARBONO						
			VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT		
1	Renewable Energy Production	1.2	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021
1	Energy Efficiency Improvements	3.1	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021
5	Methane Collection & destruction	1.3.2	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021
5	Livestock & other anaerobic digester operations	1.3.2	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021
5	Agricultural methane emission reduction	1.5.2																	
5	Agricultural carbon emission reduction	1.5.2																	
6	Capture & destruction of landfill gas	1.3.2	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021
6	Capture & use of landfill gas	1.3.1	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021
6	Avoidance of methane production in wastewater treatment	1.3.1	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021
SDS Criteria:			25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021	25.10.2021



PROJECT LEVEL GROUP	GHG PROJECT TYPE EXPERTISE	SUPPORTING CORE TECHNICAL AREA EXPERTISE	ICR					BioCarbon					GCC						
			VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT		
1	Renewable Energy Production	1.2	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023
1	Energy Efficiency Improvements	3.1	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023
5	Methane Collection & destruction	1.3.2	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023
5	Livestock & other anaerobic digester operations	1.3.2	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023
5	Agricultural methane emission reduction	1.5.1																	
5	Agricultural carbon emission reduction	1.5.1																	
6	Capture & destruction of landfill gas	1.3.1	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023
6	Capture & use of landfill gas	1.3.1	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023
6	Avoidance of methane production in wastewater treatment	1.3.1	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023
SDS Criteria:			02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023	02.02.2023

**COUNTRY EXPERTISE:**

Egypt, India, Indonesia, Iran, Kenya, Malawi, Senegal, Thailand, Türkiye, Uganda for all above listed GHGRSs

C-	Trainee	Trainee	Trainee	Trainee	Trainee
B+	Trainee	Trainee	Trainee	Trainee	Trainee
CORSCA	Trainee	Trainee	Trainee	Trainee	Trainee

# CERTIFICATE OF APPOINTMENT



Within the scope and in strict accordance to the appointments indicated below, the bearer may:

- Participate in assessments conducted by re-carbon Ltd.
- Take the appointed positions within and outside of an assessment team
- Bring specific expertise to assessments

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This Certificate of Appointment is given to

**Ms. Selen Cilasun**

as a confirmation of compliance with re-carbon's internal qualification requirements for the following positions:

This Appointment Certificate is granted on the date of **27.03.2024** by

**Christian Johannes**  
(General Manager)



PROJECT LEVEL GROUP	GHG PROJECT TYPE EXPERTISE	SOURCING / OWN TECHNICAL AREA EXPERTISE	GOLD STANDARD					VERIFIED CARBON STANDARD					CERCARBONO				
			VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT
1	Renewable Energy Production	1.2	10.01.2023	10.01.2023	10.11.2023			15.10.2022	27.02.2023	27.02.2023	10.11.2023						15.10.2022
1	Energy Efficiency Improvements	3.1															
5	Methane Collection & destruction	1.3.2	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee							Trainee
5	Livestock & other anaerobic digester operations	1.3.2	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee							Trainee
5	Agricultural methane emission reduction	1.5.2															
5	Agricultural carbon emission reduction	1.5.2															
6	Capture & destruction of landfill gas	1.3.1	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee							Trainee
6	Capture & use of landfill gas	1.3.1	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee							Trainee
6	Avoidance of methane production in wastewater treatment	1.3.1	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee							Trainee
SDS Criteria:			10.01.2023	10.01.2023	10.11.2023			15.10.2022	27.02.2023	27.02.2023	10.11.2023						15.10.2022



PROJECT LEVEL GROUP	GHG PROJECT TYPE EXPERTISE	SOURCING / OWN TECHNICAL AREA EXPERTISE	ICR					BioCarbon Registry					GCC							
			VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT	VERIFIER	VALIDATOR	TEAM LEADER	ITR	EXPERT			
1	Renewable Energy Production	1.2	27.02.2023	27.02.2023	10.11.2023			15.10.2022	27.02.2023	27.02.2023	10.11.2024			15.10.2022	27.02.2023	27.02.2023	10.11.2023			15.10.2022
1	Energy Efficiency Improvements	3.1																		
5	Methane Collection & destruction	1.3.2	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee									Trainee	
5	Livestock & other anaerobic digester operations	1.3.2	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee									Trainee	
5	Agricultural methane emission reduction	1.5.1																		
5	Agricultural carbon emission reduction	1.5.1																		
6	Capture & destruction of landfill gas	1.3.1	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee									Trainee	
6	Capture & use of landfill gas	1.3.1	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee									Trainee	
6	Avoidance of methane production in wastewater treatment	1.3.1	Trainee	Trainee	Trainee			Trainee	Trainee	Trainee									Trainee	
SDS Criteria:			27.02.2023	27.02.2023	10.11.2023			15.10.2022							27.02.2023	27.02.2023	27.02.2023			27.02.2023

**COUNTRY EXPERTISE:**

Türkiye for all above listed GHGRS

C-	15.03.2024	15.03.2024	15.03.2024		15.03.2024
B4	15.03.2024	15.03.2024	15.03.2024		15.03.2024
CONCA	15.03.2024	15.03.2024	15.03.2024		15.03.2024

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## 8. VERIFICATION AND CERTIFICATION OPINION

Re Carbon Ltd. performed the 4<sup>th</sup> (1<sup>st</sup> of 2<sup>nd</sup> CP) verification of Gold Standard “Silivri WPP”, a project with the registry reference number “GS4264” for the period in between 07/12/2023 and 15/10/2024. The scope of our activities covers the verification and the certification of GHG emissions reductions, as reported in the Monitoring Report Version 5 dated 03/02/2025 of “Silivri WPP”.

Eksim Enerji A.Ş. is responsible for the preparation of the GHG emissions data and the reported GHG emissions reductions of the project on the basis set out within the project Monitoring Plan as indicated in the final PDD. The development and maintenance of records and reporting procedures in accordance with that plan, including the calculation and determination of GHG emission reductions from the project are under the responsibility of the management of the Project. The development and maintenance of the records and the related monitoring procedures are in accordance with the Monitoring Report Version 5.

The verification was performed by a verification team consisting of “Ms. İrem TAŞKIRAN as the Team Leader, Ms. Selen CİLASUN as the Previous Team Leader and Mr. Rohit BADAYA as the ITR”, and the project activity was checked against the applicable rules and regulations of CDM including Section I of CDM Modalities and Procedures, the relevant guidance and decisions of the COP/MOP, CDM EB and CDM Validation and Verification Standard for project activities version 3.0, CDM Project Standard for project activities version 3.0, GS4GG version 1.2 and other relevant GS4GG requirements.

Re Carbon Ltd. hereby confirm that the project activity “Silivri WPP” in Turkey, was implemented in accordance with the validated and registered PDD version 10, dated 06/09/2023. The monitoring system is in place and the emission reductions were calculated without material misstatements as per the applied approved methodology “ACM0002, Grid-connected electricity generation from renewable sources, Version 20.0”.

Re Carbon Ltd. confirms the following, based on the results of the document review and the on-site assessment:

<b>Project Title</b>	Silivri WPP
<b>Applicable Period</b>	20/08/2021 – 30/11/2023
<b>Baseline Emissions</b>	223,009 tCO <sub>2</sub> e (20/08/2021-31/12/2021: 35,874 tCO <sub>2</sub> e, 01/01/2022-31/12/2022: 97,717 tCO <sub>2</sub> e, 01/01/2023-30/11/2023: 89,418 tCO <sub>2</sub> e)
<b>Project Emissions</b>	000 tCO <sub>2</sub> e
<b>Leakage Emissions</b>	000 tCO <sub>2</sub> e
<b>Emission Reductions</b>	223,009 tCO <sub>2</sub> e (20/08/2021-31/12/2021: 35,874 tCO <sub>2</sub> e, 01/01/2022-31/12/2022: 97,717 tCO <sub>2</sub> e, 01/01/2023-30/11/2023: 89,418 tCO <sub>2</sub> e)



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## PROJECT NUMBER: 857

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İrem TAŞKIRAN  
Team Leader  
17/02/2025

Rohit BADAYA  
ITR and Decision Maker  
17/02/2025

Esin TUNALI  
CMD Review  
17/02/2025

**ANNEX 1: VERIFICATION PROTOCOL**

**Table 1 – Resolution of Corrective Action, Forward Action and Clarification Requests**

Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
<p>CAR-1 25/01/2022 dated annual report should have been provided to VVB.</p>	<p>1.7</p>	<p>Response:It's been provided.  Review-1: It's been provided.</p>	<p>Review-1: Annual report has not provided.  Review-2: OK, closed. (Provided)</p>
<p>CAR-2 Duration of the monitoring period should have been corrected according to site visit date.</p>	<p>1.9</p>	<p>Response:Site visit was realized in December 2023, therefore, the period has been taken until the end of Nov 23.  Review-1: CP renewal was approved on 10/10/2023. After that the site visit was organized asap with the VVB, therefore, this timeline is organized.</p>	<p>Review-1: Start date of the first monitoring period can start 2 years before the first site visit date. August 2021 is more than 3 years from site visit date.  Review-2: OK, closed. (MP is between 20/08/2021 to 30/11/2023)</p>
<p>CAR-3 In GS registry, project developer has been shown as "İltek Enerji Yatırım Sanayi ve Ticaret A.Ş.". In registered PDD and MR project developer has been written as "Eksim Enerji A.Ş.". Contradiction should have been corrected. Eighter, GS should have been notified or project representative in MR should have been corrected.</p>	<p>1.10</p>	<p>Response:Please see the screenshot provided from the registry.  GS was notified about the error.  Review-1: It's been sent.</p>	<p>Review-1: Evidence document have not provided.  Review-2: OK, closed. (Project owner has corrected)</p>
<p>CAR-4</p>	<p>2</p>	<p>Response:</p>	<p>Review-1:</p>

\* CAR= Corrective Action Request, FAR= Forward Action Request, CL= Clarification Request

Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
<p>a) Electricity generation and emission reduction values should have been corrected according to changes in monitoring period duration.</p> <p>b) In PDD, T11, T19, T20, T22 an T23 is not considered in crediting period, they are not registered. According to this, in ER excel sheet, electricity generation calculation has not been indicated correctly. Total generation value of the months has been considered according to EPIAŞ records, but calculation should have been made with registered turbines, not with all turbines, the difference between total and registered turbines should have been considered as electricity generation. After the electricity generation calculation corrected, emission reduction values should have been updated as well.</p>		<p>a) MP is not changed. b) Please re-check the ER sheet.</p> <p>Review-1: a) It's been corrected. b) It's been revised.</p>	<p>a) Electricity generation and emission reduction values should have been corrected according to changes in the start date of monitoring period.</p> <p>b) Calculation of emission reduction has been done correctly but emission reduction &amp; electricity generation values in MR are not consistent with ER excel sheet.</p> <p>Review-2: a) OK, closed. (Updated) b) OK, closed. (Corrected)</p>
<p>CAR-5</p> <p>a) All provisional acceptance protocols should have been provided.</p> <p>b) Project start date is not in line with registered PDD.</p> <p>c) Registered installed capacity, registered installed turbine names and numbers should have been indicated clearly.</p> <p>d) Reference to applied methodology should have been shown for baseline scenario and project boundary.</p>	<p>A.1.1</p>	<p>Response: a)It's been provided. b) Please consider the registered PDD in CP1. c) Wording has been revised. d) It's been added. e) It's been provided.</p> <p>Review-1: a)It's been provided.</p>	<p>Review-1: a) All provisional acceptance protocols have not provided. b) OK, closed. (Start date of the project activity is correct) c) OK, closed. (Capacity has been clarified) d) OK, closed. (Project boundary has indicated correctly)</p>

\* CAR= Corrective Action Request, FAR= Forward Action Request, CL= Clarification Request

Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
<p>e) MR and verification report of 3<sup>rd</sup> verification should have been provided.</p>		<p>e) They've been provided. f) It's been moved under to Section B.1.</p>	<p>e) MR and verification report of 3<sup>rd</sup> verification have not provided. f) Milestone table is empty in section A.1.  Review-2: a) OK, closed. (Provided) e) OK, closed. (Provided) f) OK, closed. (Milestone has moved to section B.1.)</p>
<p>CAR-6</p> <p>a) According to site visit, there are 3 villages that are closed to project are. Third village name should have been indicated as well. b) Screenshot of the KMZ (with showing turbines) should have been indicated in section A.2 of the MR.</p>	<p>A.2.1</p>	<p>Response:</p> <p>a) Please see the registered PDD and previous verification reports of the project. b) This format has already been approved by Sustaincert. And coordinates have already been provided.</p>	<p>Review-1:</p> <p>a) OK, closed. (Location has indicated correctly) b) OK, closed. (Location has indicated correctly)</p>
<p>CAR-7</p> <p>In section A.3, tools that are only about verification process should have been indicated. There is an unrelated tool that is about cp renewal.</p>	<p>A.3.1</p>	<p>Response: It's been removed.</p>	<p>Review-1: OK, closed. (Unnecessary tool has removed)</p>
<p>CAR-8</p> <p>a) Technical specifications of the generators should have been indicated Section B.1 b) Meter details (brand, serial number, calibration dates and so on) should</p>	<p>B.1</p>	<p>Response:</p> <p>a) This section is directly taken from PDD. b) We indicated in the parameter and accepted by Sustaincert. c) Table 4 has moved to section B1. d) It's already indicate in parameter. e) Please see the Ministry Acceptance Protocols.</p>	<p>Review-1:</p> <p>a) OK, closed. (Turbine specifications are available) b) Meter details (brand, serial number, calibration dates and so on) should have been</p>

\* CAR= Corrective Action Request, FAR= Forward Action Request, CL= Clarification Request

Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
<p>have been indicated in tabular format in section B.1 as well.</p> <ul style="list-style-type: none"> <li>c) Commissioning dates of turbines should have been indicated.</li> <li>d) Meter change details should have been indicated.</li> <li>e) Data sheets of turbines and generators should have been provided.</li> <li>f) Meter test documents (if the meter test have been conducted) should have been provided and meter test dates should have been indicated.</li> </ul>		<p>Review-1:</p> <ul style="list-style-type: none"> <li>b)It's been added.</li> <li>d)Please see the parameter.</li> <li>f)It's been provided.</li> </ul>	<p>indicated in tabular format in section B.1 as well since section B.1 is the description of the technology used.</p> <ul style="list-style-type: none"> <li>c) OK, closed. (Milestone table has been indicated)</li> <li>d) Meter change details are still missing.</li> <li>e) OK, closed (Turbine specifications are correct)</li> <li>f) Meter control test documents have not provided.</li> </ul> <p>Review-2:</p> <ul style="list-style-type: none"> <li>b) OK, closed. (Meter details also indicated in section B.1)</li> <li>d) OK, closed.</li> <li>f) OK, closed. (Provided but provided document does not in MP)</li> </ul>
<p>CAR-9</p> <p>In design renewal review document, there are 3 FARS. Section B.1.1 should have been indicated correctly.</p>	<p>B.1.1.1</p>	<p>Response:Section B.1.1 has been revised.</p> <p>Review-1:</p> <p>It's been added and stated.</p>	<p>Review-1:</p> <p>Site visit date is missing for FAR-1 response. More explanation for FAR-2 is needed, if the VVB is same, it should be stated that the team of the verification is different than the previous process.</p> <p>Review-2:</p>

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			OK, closed. (Explanation indicated)
<p>CAR-10</p> <ul style="list-style-type: none"> <li>a) The roles of power plant employees should have been indicated.</li> <li>b) Organizational chart should have been indicated.</li> </ul>	C.1	Response:a)b)It's been added.	<p>Review-1:</p> <ul style="list-style-type: none"> <li>a) OK, closed. (Roles of power plant employees have been indicated)</li> <li>b) OK, closed. (Organizational chart has been indicated)</li> </ul>
<p>CAR-11</p> <ul style="list-style-type: none"> <li>a) Future tens used sentences should have been corrected throughout the MR since this verification process is between 2021-2023 years.</li> <li>b) Relevant SDG indicator should have been corrected for EG PJ, grid, y parameter.</li> <li>c) Footnote has been missing for source of data for EG PJ, grid, y parameter according to registered PDD.</li> <li>d) Monitoring frequency has been indicated wrong for EG PJ, grid, y parameter.</li> <li>e) Specify the old and current meters for EG PJ, grid, y parameter.</li> <li>f) Latest test date of the old meters is missing in EG PJ, grid, y parameter.</li> <li>g) First index date, calibration date and meter test date should have been indicated separately for EG PJ, grid, y parameter.</li> </ul>	D.2	<p>Response:</p> <ul style="list-style-type: none"> <li>a)It's been revised.</li> <li>b)It's been revised.</li> <li>c) It's been added.</li> <li>d) It's been revised.</li> <li>e) They already exist.</li> <li>f) Latest test date is the installation date of the current (new meters).</li> <li>g) This is CP2 of the project activity and installation date of the meters have already been included.</li> <li>h) It's been revised.</li> <li>i)It's been added.</li> <li>j)It's been added.</li> <li>k)they've been provided.</li> <li>l) they've been provided.</li> <li>m)n) These are already validated during CP1 and CP2. The links are changing by the responsible bodies, these cannot be tracked over the time.</li> <li>o) Assigned technician by Plant Manager monitors carcass/nest in the Project area and keep records in case of a carcass/nest.</li> </ul>	<p>Review-1:</p> <ul style="list-style-type: none"> <li>a) Format of the tables in section D.2 should be corrected.</li> <li>b) OK, closed. (SDG indicator has indicated)</li> <li>c) OK, closed. (Footnote of the related parameter's source of data has indicated)</li> <li>d) OK, closed. (Monitoring frequency has corrected)</li> <li>e) Since the tabular format is not correct, VVB will check the meter details after the format of the table corrected.</li> <li>f) Since the tabular format is not correct, VVB will check the meter details after the format of the table corrected.</li> <li>g) Since the tabular format is not correct, VVB will check</li> </ul>

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Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
<ul style="list-style-type: none"> <li>h) For Ery parameter value(s) applied row, only achieved net value should have been indicated.</li> <li>i) Briefly describe the Measurement methods and procedures for Ery parameter.</li> <li>j) Training dates should have been indicated for "Number of employees to be trained for the construction and operation of the plant, Fair wage, working hours and occupational injuries" parameter.</li> <li>k) Waste disposal records should have been provided for waste oil and waste water.</li> <li>l) Waste disposal record dates should have been indicated for "Waste oil disposal" and "Water Quality and Quantity" parameters.</li> <li>m) Indicated link for Air Quality parameter does not work, it should be revised.</li> <li>n) Indicated links for Water Quality and Quantity parameter does not work, it should be revised.</li> <li>o) Carcass reports should have been provided and if there are no dead bird or bats it should have been indicated for Biodiversity parameter.</li> <li>p) Evidence document for "Impact on objects or structures of significant cultural heritage" parameter should have been provided. If there are no</li> </ul>		<p>p) It's been monitored through visual inspection or interviews with local stakeholders. VVB verified this during the site visit.</p> <p>Review-1:</p> <ul style="list-style-type: none"> <li>b)e)f)g)Format of the tables in section D.2 has been corrected.</li> <li>h) Values have been corrected.</li> <li>j)The info has been added.</li> <li>k)The records have been provided.</li> <li>l) They have been added.</li> <li>o)It's been provided.</li> <li>p)It's been provided.</li> </ul>	<p>the meter details after the format of the table corrected.</p> <ul style="list-style-type: none"> <li>h) Values of Ery parameter are not inline with ER Excel Sheet. Also, after the revision of start date of the MP, PP should update all values in MR according to new values.</li> <li>i) OK, closed. (Measurement method of Ery parameter has indicated)</li> <li>j) Number of trained employees are missing for "Number of employees to be trained for the construction and operation of the plant, Fair wage, working hours and occupational injuries" parameter.</li> <li>k) Water disposal records are still missing.</li> <li>l) Dates of waste disposal records have not indicated in for "Waste oil disposal" and "Water Quality and Quantity" parameters.</li> <li>m) OK, closed.</li> <li>n) OK, closed.</li> </ul>

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Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
evidence document, PP should have provide signed and sealed declaration about it.			o) Reports of carcass has not provided. p) Declaration for heritage parameter has not provided.  Review-2: a) OK, closed. (Corrected) e) OK, closed. (Meter details are correct) f) OK, closed. (Corrected) g) OK, closed. (Meter details are correct) h) OK, closed. (Corrected) j) OK, closed. (Indicated) k) OK, closed. (Provided) l) OK, closed. (Indicated) o) OK, closed. (Provided) p) OK, closed. (Provided)
CAR-12 a) "Table 6- Baseline Emissions" statement in Section E.1 should have been removed. b) Calculation for showing total production from registered and unregistered turbines should have been added.	E.1	Response: a) We always use this statement. b) "Adjusted" term indicates the registered turbines. Please see the previous MRs and VRs. c) Period has been corrected.  Review-1: b)Section E1 has been revised accordingly. c) CP renewal was approved on 10/10/2023. After that the site visit was organized asap with the VVB, therefore, this timeline is organized.	Review-1: a) OK, closed. (Table for baseline emissions has been indicated) b) "Adjusted" statement has not indicated in calculation, it has only indicated in table-6. PP should show how the calculation of registered turbines done in section E.1.

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Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
<p>c) Also, electricity generation and emission reduction should have been corrected according to above CARs.</p>			<p>c) Electricity generation and emission reduction should have been updated according to above CARs</p> <p>Review2:</p> <p>b) OK, closed. (Indicated)</p> <p>c) OK, closed (Updated)</p>
<p>CAR-13</p> <p>Emission reduction value of the current monitoring period should have been corrected in Section E.2</p>	<p>E.2</p>	<p>Response:</p> <p>MP has been revised accordingly.</p>	<p>Review-1:</p> <p>Value of SDG 7 needs to be updated. Also, value of SDG 8 is not consistent throughout the MR.</p> <p>Review-2:</p> <p>OK, closed. (Values are corrected)</p>
<p>CAR-14</p> <p>a) Monitoring period dates should have been revised accordingly to the site visit date.</p> <p>b) For SDG 8, comparison of actual value with estimated value in registered PDD are not indicated.</p>	<p>E.5</p>	<p>Response:</p> <p>a)MP has been revised accordingly.</p> <p>b)It already exists in the table, however, it's also added by sentence.</p> <p>Review-1:</p> <p>CP renewal was approved on 10/10/2023. After that the site visit was organized asap with the VVB, therefore, this timeline is organized.</p>	<p>Review-1:</p> <p>a) Start date of the first monitoring period can start 2 years before the first site visit date. August 2021 is more than 3 years from site visit date.</p> <p>b) OK, closed. (SDG 8 estimated and actual value is correct)</p> <p>Review-2:</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
			a) OK, closed. (MP duration has corrected)
<p>CAR-15</p> <p>a) For SDG 7, comparison of actual values with estimated values in registered PDD should be added as a percentage.</p> <p>b) Explanation of why achieved values are 16% more than estimated values should have been indicated.</p>	E.6	<p>Response:</p> <p>a) Percentage already exists.</p> <p>b) It's been added.</p> <p>Review-1:</p> <p>a)b)Section E6 has been revised accordingly.</p>	<p>Review-1:</p> <p>a) PP should state if the comparison percentage is more or less than the actual values.</p> <p>b) Explanation indicated. Also, update the actual values according to change in start date of the MP.</p> <p>Review-2:</p> <p>a) OK, closed. (Indicated)</p> <p>b) OK, closed. (Updated)</p>
<p>CAR-16</p> <p>"Safeguards Reporting" template should have been indicated in Section F and filled in the template. Also, parameter tables should have been deleted since those tables belong to section D.2</p>	F.1	<p>Response:</p> <p>"Safeguards Reporting" section is applied with the parameter boxes as we do for all our other projects.</p>	<p>Review-1:</p> <p>OK, closed. (Safeguarding principles have indicated correctly)</p>
<p>CAR-17</p> <p>a) A signed and sealed letter that there was no legal contest arisen during the current monitoring period should have been provided.</p> <p>b) A signed and sealed declaration for double counting should have been provided.</p>	G.1	<p>Response:</p> <p>a)b)c) The documents have been provided.</p> <p>Review-1:</p> <p>a)b)c)All documents have been provided.</p>	<p>Review-1:</p> <p>a) A signed and sealed letter that there was no legal contest arisen during the current monitoring period have not provided.</p> <p>b) A signed and sealed declaration for double counting has not provided.</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests By Verification Team	Ref. to Checklist Questions in Table-1	Summary of Project Developers' Response	Verification Team Conclusion
c) Photographic evidence of logbook should have been provided.			c) Photographic evidence of logbook has not provided. Review-2: a) OK, closed. (Provided) b) OK, closed. (Provided) c) OK, closed. (Provided)
CAR-18 The amount of emission reductions in the Table 1 does not match with the emission reductions as per the ERs Excelsheet. Similarly, the emission reductions for the vintage (20/08/2021 – 31/12/2021) does not match with the emission reductions as per the emission reductions excelsheet.	ITR	Please see v03 of the ER Sheet.	Review-1: OK, closed. (Values in MR match with the values in ER Excel Sheet)
CAR-19 In KPI, the end date of previous monitoring period is 31/07/2021 as per the GS website, however the start date of the current monitoring period is 20/08/2021. However please refer to the following GS Principles and Requirements (paragraph 5.1.45): “Note that review of the Design Certification Renewal may complete after the last date of current crediting period. In this case, the renewal date shall be the first day after the end date of the current certification cycle”.  Hence the start date of monitored period may be checked in view of the above requirements.	ITR	Since 19 days belongs to first CP of the project activity, another reporting was needed to be done if the credits are requested to be issued as per the latest rules. It was not chosen to do a separate reporting for the gap days.	Review-1: OK, closed. (MP dates are 20/08/2021 – 30/11/2023)

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<p>CAR-20</p> <p>The “design certification date” is provided as 08/09/2021 in the KPI section of MR. However please check whether the date (08/09/2021) is the “design certification date” or “project renewal date”. Check and Clarify.</p>	<p>ITR</p>	<p>KPI section has been revised.</p>	<p>Review-1: OK, closed. (KPI section has updated for date of design certification)</p>														
<p>CAR-21</p> <p>Section B.1, the capacity of each turbine is “3.6 MWm/3.6 MWe” as per the Section B.1, however the capacity is 3MWm/0,1MWe as per the submitted technical specifications document.</p>	<p>ITR</p>	<p>It’s been corrected.</p>	<p>Review-1: OK, closed. (Capacity of added turbines have corrected)</p>														
<p>CAR-22</p> <p>Section A.1, the start date is provided as 15/03/2013 as per the statement “The project start date is 15/03/2013 as the date of agreement for equipment contract with Nordex” in the MR. However, the start date is 20/08/2014 as per the PDD. Check on the observed differences.</p>	<p>ITR</p>	<p>20/08/2014 is the start date of operation. 15/03/2013 is the project start date.</p> <table border="1" data-bbox="891 895 1666 1062"> <tr> <td>29/04/2013</td> <td>Issuance of the License</td> </tr> <tr> <td>06/01/2012</td> <td>Agreement with Carbon consultant</td> </tr> <tr> <td>15/03/2013</td> <td>Agreement with Equipment provider</td> </tr> <tr> <td>03/02/2012</td> <td>Silivri Wind Data Analysis and Energy Production Generation Asses</td> </tr> <tr> <td>29/03/2013</td> <td>Loan Proposal Date</td> </tr> <tr> <td>21/10/2013</td> <td>Date for start of construction</td> </tr> <tr> <td>20/08/2014</td> <td>start date of operation</td> </tr> </table>	29/04/2013	Issuance of the License	06/01/2012	Agreement with Carbon consultant	15/03/2013	Agreement with Equipment provider	03/02/2012	Silivri Wind Data Analysis and Energy Production Generation Asses	29/03/2013	Loan Proposal Date	21/10/2013	Date for start of construction	20/08/2014	start date of operation	<p>Review-1: OK, closed.</p>
29/04/2013	Issuance of the License																
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<p>CAR-23</p> <p>As there is an increase in the electricity generation and emission reductions, hence explanation of any significant increase (including data/parameters) that is different from that states in the registered PDD shall be provided. Further it shall be clarified as how the project is still additional considering the increased electricity generation.</p>	<p>ITR</p>	<p>As per the registered IRR, an increase of 17% in energy yield causes the IRR to reach 14.68% which is still below the benchmark rate. Energy yield increase rate is 15.6% which is lower than 17%.</p>	<p>Review-1: OK, closed. (Explanation is satisfactory and related evidence document has provided)</p>														

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