



TEMPLATE

KEY PROJECT INFORMATION & PROJECT DESIGN DOCUMENT (PDD)

PUBLICATION DATE **29.06.2023**

VERSION **v.1.5**

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KEY PROJECT INFORMATION

GS ID of Project	GS 1237
Title of Project	Sadilli Wind Farm Project, Türkiye
Time of First Submission Date	23/03/2026
Date of Design Certification	10/09/2013
Version number of the PDD	02
Completion date of version	18/08/2026
Project Developer	Çanres Elektrik Üretim A.Ş.
Project Representative	Gaia Finansal Danışmanlık A.Ş.
Project Participants and any communities involved	Çanres Elektrik Üretim A.Ş.
Host Country (ies)	Türkiye
Activity Requirements applied	☐ Community Service Activity ☒ Renewable Energy ☐ Land-Use and Forests Activity Requirements/Risks & Capacities ☐ N/A
Scale of the project activity	☐ Micro scale ☐ Small Scale ☒ Large Scale
Other Requirements applied	N/A
Methodology (ies) applied and version number	ACM0002, V.22.0.
Product Requirements applied	☒ GHG Emissions Reduction & Sequestration ☐ Renewable Energy Label ☐ N/A
Project Cycle:	☒ Regular ☐ Retroactive

Table 1 – Estimated Sustainable Development Contributions

SUSTAINABLE DEVELOPMENT GOALS TARGETED	SDG IMPACT (DEFINED IN B.6)	ESTIMATED ANNUAL AVERAGE	UNITS OR PRODUCTS
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Climate Action (mandatory)	SDG 13	87,118 tCO ₂ /year	CO ₂
Affordable and clean energy	SDG 7	134,400 MWh/annually renewable energy	MWh
Balance of payments and investment	SDG 7	5,528,573 m ³ of natural gas and 1,864,788 € avoided per year	m ³ natural gas and € spending
Decent work and economic growth	SDG 8	The project provides between 5 and 15 employments. HSE trainings to be held	N/A
Clean water	SDG 6	Avoidance of 5,563.17 m ³ /year wastewater discharge to the environment	m ³

SECTION A. DESCRIPTION OF PROJECT

A.1 Purpose and general description of project

This Project Activity constitutes a Design Change related to a capacity increase of the previously registered Sadilli Wind Farm Project under the Gold Standard for the Global Goals (GS4GG). The design change concerns the planned expansion of the installed capacity of the existing wind power project, while maintaining the original project activity and baseline scenario. The purpose of this section is to describe the original registered project and the scope of the proposed capacity expansion in accordance with the applicable Gold Standard requirements.

Çanres Elektrik Üretim A.Ş. (hereafter referred to as “Çanres Elektrik”), operated 14 units of “Sadıllı Wind Farm Project” with total installed capacity of 38.5 MWm/33 MWe. The Project consists of the installation of 14 wind turbines that have an installed capacity of 2.75 MWm each; totaling 38.5 MWm. The Project is located in Tekirdağ province, in Türkiye. Energy Market Regulatory Authority (EMRA) issued the license of the project in February 2012 for 33 MWe. Operation start date of the first three turbines was 27/10/2014, and it is considered as the actual start date of the project.

The registered Project generates 112,000 MWh per year¹. The electricity produced by project activity resulted in a total emission reduction of 72,598 tCO₂ per year. The existing wind turbines, each equipped with 3 blades, have a hub height of 85 m and a rotor diameter of 100 m. The Project has been connected to the Keşan transformer station via a 154 kV high voltage transmission line.

As part of a planned capacity expansion (design change), the project owner intends to install six additional wind turbine generators with a nominal capacity of 6.0 MWm each. Upon completion, the total physical installed capacity of the wind farm will increase from 38.5 MW to 74.5 MWm.

The capacity expansion is being implemented in line with the applicable national regulatory framework. An Environmental Impact Assessment (EIA) process has been completed for the first phase of the expansion covering the installation of four additional turbines, and an “EIA Not Required” decision has been obtained for the subsequent two turbines in accordance with the relevant legislation.

In accordance with the Gold Standard for the Global Goals (GS4GG) requirements for design changes involving capacity increases, Gold Standard certification is limited to a maximum capacity increase of 20% over the originally registered installed capacity. Since the originally registered installed capacity is 38.5 MWm, the maximum eligible installed capacity under Gold Standard after the capacity increase will be 46.2 MWm ($38.5 \text{ MWm} \times 1.20$) with an increase of 7.7 MWm. Thus, the estimated annual electricity generation will be 134,400 MWh with 20% capacity increase and the estimated annual emission reduction will be 87,118 tCO₂e. Accordingly, for Gold Standard purposes,

¹ Garrad Hassan “Assessment of The Energy Production of The Proposed Sadıllı Wind Farm” report.

emission reductions will be calculated only for the eligible installed capacity (46.2 MWm), while any capacity beyond this threshold will not be included within the Gold Standard certification boundary and will not generate VERs under Gold Standard. The detailed approach for monitoring and attribution of electricity generation to the eligible capacity will be addressed in the relevant sections of this PDD.

The additional six turbines are planned to start operation on 01/11/2026. This assumption is consistent with the current generation licence (EÜ/3696-3/2248), as amended on 10/06/2026, which sets the facility completion deadline for turbines T15–T19 and T20 at 31/12/2026. All electricity production and emission reduction values have been calculated in line with the 01/11/2026 assumption.

Table 2 – Project Implementation Schedule

Date	Milestone
01/11/2007	Application to EMRA for license
15/11/2011	Proposals for carbon development collected (prior consideration)
29/12/2011	Confirmation for going ahead with carbon development services
26/01/2012	EIA exemption permit acquired
15/02/2012	License issued by EMRA
28/02/2012	Equipment order signed
06/08/2012	Agreement with the construction company is signed
03/09/2012	Mobilisation on site initiated (road construction etc.)
19/12/2012	Loan agreement signed
26/12/2012	Final license amendment application made to EMRA
12/12/2013	EIA exemption permit amended according to the turbine coordinate change
27/10/2014	3 turbines with 8.25 MWe capacity started to operate (start date of the first monitoring period)
14/11/2014	5 turbines with 13.75 MWe capacity started to operate
06/12/2014	6 turbines with 16.5 MWe capacity started to operate
31/03/2016	End date of the first monitoring period
01/04/2016	Starting date of the second monitoring period
27/09/2016	Issuance of VERs for the first monitoring period
30/09/2017	End date of the second monitoring period
01/10/2017	Starting date of the third monitoring period

09/02/2018	Issuance of VERs for the second monitoring period
30/09/2019	End date of the third monitoring period
14/09/2020	Issuance of VERs for the third monitoring period
26/05/2022	Licence amendment by EMRA for 5 new turbines
28.08.2023	EIA positive decision for four new turbines of capacity 5.3 MW each
23.10.2023	EIA not required decision for one turbine of capacity 6.1 MW (T19)
02/11/2023	Licence amendment by EMRA for 1 new turbine
08.12.2023	EIA not required decision for one turbine of capacity 6.1 MW (T20)

A.1.1. Eligibility of the project under Gold Standard

The project is eligible in line with Renewable Energy Activity Requirements. Information about the eligibility of Şadıllı WPP is provided below.

Required points as per design certificate renewal rules are given in Section 5.1.47 of the GS4GG Principles & Requirements v1.2. The project activity meets the eligibility criteria as per Section 3.1.1 of the GS4GG Principles & Requirements document, as described below:

- The Project applies ACM0002: "Grid-connected electricity generation from renewable sources" — Version 22.0
- The project type is power generation using wind energy, an eligible project type under Section 1.1.1 a) and 1.1.1 b) of the Eligible Project Types & Scope under Renewable Energy Activity Requirements.
- The project activity results in the displacement of electricity from thermal power plants while contributing to the sustainable development of Türkiye. Hence, the Project contributes to the Gold Standard Vision and Mission.
- Wind power is an approved project type and does not require prior approval from Gold Standard.
- This project activity is not associated with geo-engineering or energy generated from fossil fuels or nuclear fuel, nor does it enhance or prolong such energy generation.
- The Project is not registered with any other schemes.
- Type of Project: Şadıllı WPP is a wind power project.

Location: The host country is the Republic of Türkiye. The project area is located in the Marmara Region, Tekirdağ Province. The project is situated in Şadıllı District; Elmalı

village. After the renewal of the crediting period, there has been no change in the location of Şadıllı WPP.

Project Area, Project Boundary and Scale: The Project Area, Scale of the Project and Project Boundary have been defined in the PDD. Şadıllı WPP is a “large-scale” project.

Host Country Requirements: There are no additional laws that have come into force that have an impact on the project activity, and the project activity remains in line with the applicable laws and regulations. Şadıllı WPP complies with applicable Turkish laws and environmental, ecological and social regulations, including the law on investment, the law on environmental protection, the electricity law, the labour code, and the land law. Consistency with mandatory laws and regulations is given in Section B.5 of the PDD.

Contact Details: This information is provided in this PDD. There is no change regarding the contact details of Şadıllı WPP.

Legal Ownership: There is no change in the information previously provided regarding the legal ownership of the project. Çanres Elektrik Üretim A.Ş. is the legal developer and owner of the project.

Other Rights: There is no change in the information previously provided regarding the specified legal rights. Çanres Elektrik Üretim A.Ş. has the legal rights for the VER credits that will be issued under Gold Standard.

Official Development Assistance (ODA) Declaration: The Project Developer has already submitted the Official Development Assistance (ODA) declaration.

- The project helps Türkiye to stimulate and commercialise the use of grid-connected renewable energy technologies and markets.

The Project is an eligible project type under the Gold Standard for the Global Goals. In addition, Şadıllı WPP demonstrates its contribution to the Sustainable Development Goals, including impacts on SDG 13, SDG 8, SDG 7 and SDG 6. The Project will continue to contribute to the Safeguarding Principles after the capacity addition.

The emission reduction calculations are based on two main parameters: the energy produced and the grid emission factor. The project baseline remains ACM0002 “Grid-connected electricity generation from renewable sources”. There are no changes to the Eligibility Principles, Criteria and Requirements after the design change due to the capacity addition.

In accordance with GS4GG requirements governing design changes involving capacity increases, although the total physical installed capacity of the wind farm will increase

following the installation of additional turbines, Gold Standard certification is limited to a maximum capacity increase of 20% above the originally registered installed capacity of 38.5 MWm. Accordingly, the maximum eligible installed capacity under Gold Standard is 46.2 MWm. Emission reductions will therefore be calculated exclusively for the electricity generation attributable to the eligible installed capacity within the Gold Standard certification boundary.

- Şadıllı WPP is not registered with any other voluntary or compliance schemes, and there is no potential for double counting of impacts. No GHG-related environmental credits are applied to the Turkish power sector. Moreover, the GS1237 Sadıllı Wind Farm Project, Türkiye is not included in an ETS or other GHG trading mechanism. Since an ETS is not implemented in Türkiye, an emission reduction cap has not been enforced for any sector. Therefore, no double-counting risk exists for Türkiye and for this project. This information is confirmed in the no-double counting declaration by Çanres Elektrik Üretim A.Ş. If any such risk of double counting arises in Türkiye, the Project Developer (Çanres Elektrik Üretim A.Ş.) shall retire eligible units equal to the quantity of Gold Standard VERs.

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

Çanres Elektrik Üretim A.Ş. is the legal developer and owner of the project and holds the legal rights for the VER credits that will be issued under Gold Standard.

As the project developer, Şadıllı believes that the efficient utilization of natural resources, in harmony with responsible environmental considerations, is vital for the sustainable development of Türkiye and the world. This has been a guiding principle for the shareholders in the design and installation of the wind power project. In addition to the objective of climate change mitigation through significant reduction in greenhouse gas (GHG) emissions, the project has been implemented to provide sustainable social and economic contributions to the region.

The benefits gained through the realization of the project compared to the business-as-usual scenario can be summarized under four main indicators:

Environmental

The project activity replaces grid electricity, which is generated from a mix of fuel sources that cause greenhouse gas emissions. By reducing the consumption of fossil

fuels, the project contributes to the conservation of water, soil, flora and fauna and supports the preservation of natural resources for future generations.

In the absence of the project activity, an equivalent amount of electricity would have been generated from power plants connected to the grid, the majority of which are based on fossil fuels. Thus, the project replaces greenhouse gas emissions (CO₂, CH₄) and other pollutants (SO_x, NO_x, particulate matter) arising from the extraction, processing, transportation and combustion of fossil fuels for electricity generation connected to the national grid.

Following the planned capacity addition, the environmental benefits of the project are expected to increase proportionally with the additional renewable electricity generation. However, in accordance with Gold Standard requirements, emission reductions will only be credited for the eligible installed capacity defined within the certification boundary.

Economical

The project helps accelerate the growth of the wind power industry and stimulate the design and production of renewable energy technologies in Türkiye. It encourages entrepreneurs, irrespective of sector, to invest in wind power generation. The project also assists in reducing Türkiye's increasing energy deficit and diversifying the electricity generation mix, while decreasing import dependency, particularly on natural gas.

Importantly, rural development is supported in the areas surrounding the project site by providing infrastructural investments to remote villages.

Social

Employment of local people with the necessary technical qualifications is prioritized during both the construction and operation phases of the wind farm. As a result, local poverty and unemployment are partially alleviated through increased job opportunities and related business activities.

Construction materials for foundations, cables and auxiliary equipment are preferentially sourced locally where feasible. Moreover, as a contribution to regional welfare, the quality and reliability of electricity consumed in the region are enhanced through local electricity production, which also contributes to the reduction of distribution losses.

Technological

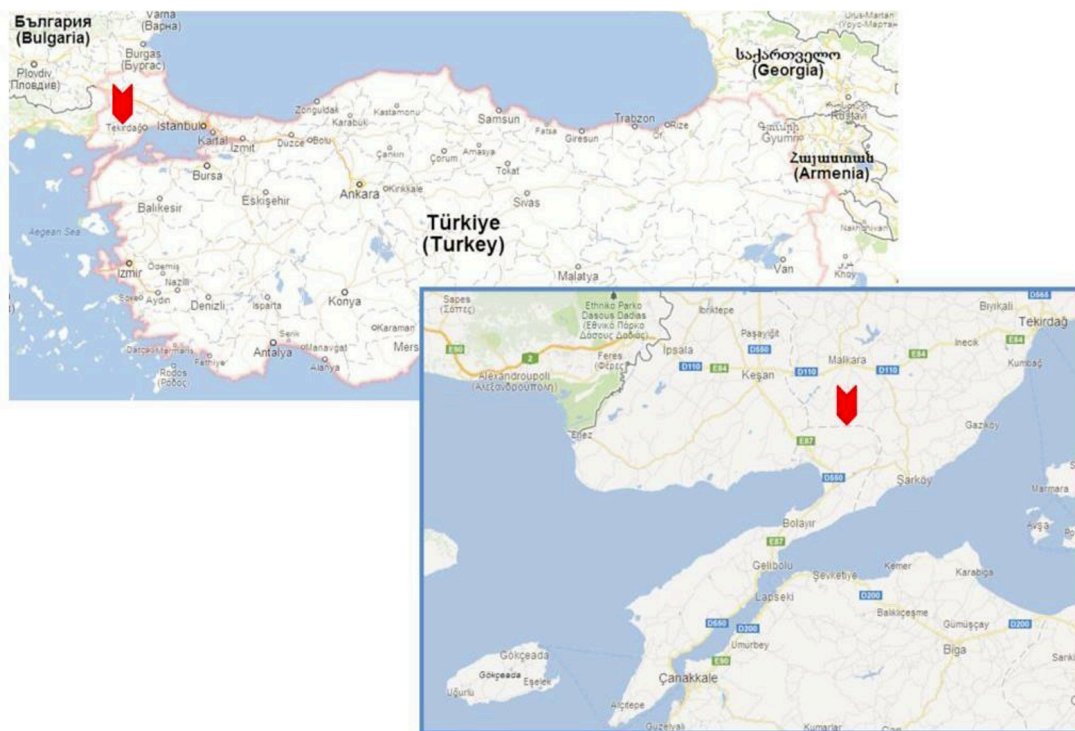
Implementation of the proposed project contributes to the wider deployment of wind power technology at both local and national levels. It demonstrates the viability of larger grid-connected wind farms and supports improved energy security, sustainable energy alternatives and renewable energy industry development.

The project strengthens the pillars of the Turkish electricity supply system through the use of environmentally sound technology.

A.2 Location of project

The host country is the Republic of Türkiye. The project area is located in the Marmara Region, Tekirdağ Province. The Project is situated near the villages of Süleymaniye, Bayramiç and Elmalı within the Şadıllı District in Tekirdağ, Türkiye.

The location of the project is shown in Figure 1.



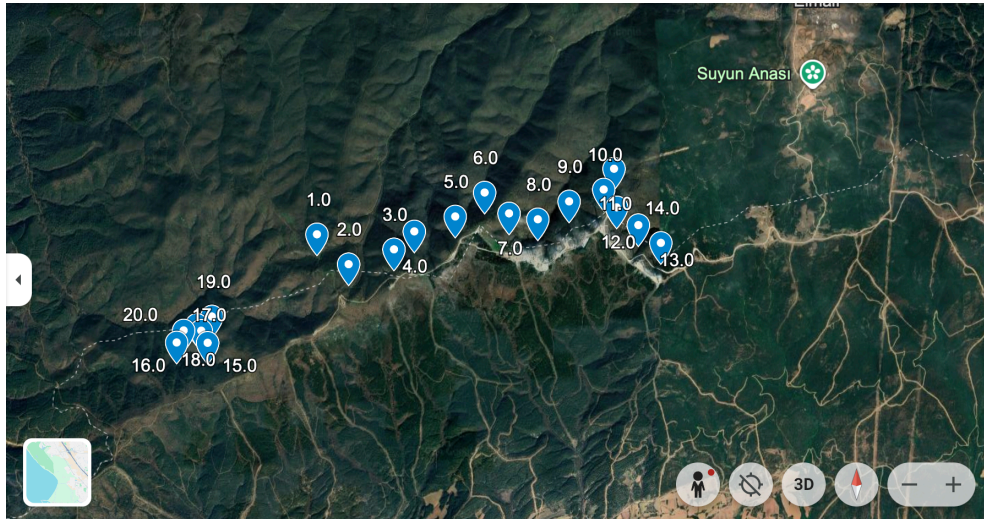


Figure 1: Location of Şadıllı WPP

The coordinates of the turbines are provided below. The original generation license was issued for 14 turbines, each with an installed capacity of 2.75 MW. Following the planned capacity expansion, additional wind turbines will be installed within the same general project area in accordance with the relevant regulatory approvals. There is no change in the overall project location or host country. The expanded turbines will remain within the defined project area as described in this PDD and in the applicable environmental approval documentation.

Table 3 – Geographical coordinates of the turbines of Şadıllı WPP

Wind Turbine No.	Longitude (E)	Latitude (N)
<i>Originally Registered Turbines</i>		
1	26° 53' 13"	40° 45' 04"
2	26° 53' 27"	40° 44' 54"
3	26° 53' 47"	40° 44' 59"
4	26° 53' 56"	40° 45' 05"
5	26° 54' 14"	40° 45' 10"
6	26° 54' 27"	40° 45' 18"
7	26° 54' 38"	40° 45' 11"
8	26° 54' 51"	40° 45' 09"
9	26° 55' 05"	40° 45' 15"
10	26° 55' 20"	40° 45' 19"

11	26° 55' 25"	40° 45' 26"
12	26° 55' 26"	40° 45' 13"
13	26° 55' 36"	40° 45' 07"
14	26° 55' 46"	40° 45' 01"
<i>Turbines Included under Design Change (Capacity Increase)</i>		
15	26° 52' 21"	40° 44' 31"
16	26° 52' 13"	40° 44' 31"
17	26° 52' 24"	40° 44' 27"
18	26° 52' 19"	40° 44' 33"
19	26° 52' 26"	40° 44' 36"
20	26° 52' 10"	40° 44' 27"

A.3 Technologies and/or measures

Originally Registered Project Technology:

The Project activity involves the generation of renewable energy from wind, thereby displacing grid electricity that is partly generated from fossil fuel-fired power plants. The wind-driven blades are connected to an electricity generator, which produces electrical energy and supplies it directly to the grid without storage.

GE Energy, a wind turbine manufacturer, was selected as the equipment provider for the originally registered project. Şadıllı WPP consists of fourteen (14) GE 2.75–100 type turbines, each with an installed capacity of 2.75 MW, resulting in a total installed capacity of 38.5 MWm / 33 MWe.

Each turbine is equipped with:

- Three blades,
- A rotor diameter of 100 meters,
- A hub height of 85 meters,
- A generator rated at 2.75 MW.

The Project has been connected to the Keşan transformer station via a 154 kV high voltage transmission line.

The registered Project generates approximately 112,000 MWh per year. With figures taken from the Feasibility Report, the Plant Load Factor (PLF) is calculated as follows:

$$\text{PLF} = \text{Annual Generation} / (\text{Installed Capacity} \times \text{Working Hours})$$

$$= 112,000 \text{ MWh} / (33 \text{ MWe} \times 8,760 \text{ h})$$

$$= 0.39 \text{ or } 39\%$$

The project activity achieves emission reductions by avoiding CO₂ emissions from the business-as-usual electricity generation scenario, which is mainly based on fossil fuel-fired power plants within the Turkish national grid.

Under the originally registered project configuration, total emission reductions over the 7-year crediting period were estimated at 508,385 tCO₂e, based on the assumed total net electricity generation of 112,000 MWh/year.

The second 7-year crediting period is expected to run from 27/10/2021 to 26/10/2028.

The operational lifetime of Şadıllı WPP is determined using the "Tool to determine the remaining lifetime of equipment" (v1). The tool states that project participants may use one of the following options:

- (a) Use manufacturer's information on the technical lifetime of equipment and compare it to the date of first commissioning;
- (b) Obtain an expert evaluation;
- (c) Use default values.

For this project, option (c) has been selected. According to the tool, the default lifetime for onshore wind turbines is 25 years.

Design Change – Capacity Increase:

As described in Section A.1, this Project Activity constitutes a Design Change involving a capacity increase of the originally registered Şadıllı WPP. The project owner intends to install six additional wind turbine generators with a nominal capacity of 6.0 MW each.

Upon completion, the total physical installed capacity of the wind farm will increase from 38.5 MWm to 74.5 MWm.

Technical specifications of the additional turbines are given below:

Operating Parameters	Type	GW165-6.0
	Rated power	6000KW
	Cut-in wind speed	3m/s
	Cut-out wind speed	24m/s
	Design lifetime	20

	Operating ambient temperature	-20°C ~ +40°C
	Standby ambient temperature	-30°C ~ +50°C
	Nominal rotor diameter	165m
	Swept area	21382 m ²
	Number of blades	3
Generator	Type	Permanent Magnet Direct Drive Synchronous Generator
	Rated power	6300KW
	Design	IEC S
	Rated current	2150 A
	Rated rotation speed	10.7 r/min
	Protection class	IP 54
	Insulation category	F
Converter	Type	Full Power Converter (IGBT Modules)
	Protection class	IP 54
	Output power factor regulated range	-0.95~+0.95 @1pu voltage
	Rated output voltage	900 V
	Rated output current	4106 A
Yawing System	Design concept	Four Stage moderating/ Motor Driving
	Rated of movement	0.21°/s
	Yawing system	Automatic Wind Direction Capturing
Brake system	Aerodynamic braking	Blades feathered brake
	Mechanical braking	Hydraulically brake
Control System	Type	PLC
Lighting protection	Design Standards	IEC 61400-24、IEC 62305
	Earth resistance	4 Ω
Tower	Type	Steel
	Hub height	100 m

The additional turbines operate under the same grid-connected renewable electricity generation principle as the originally registered turbines. No change occurs in:

- Energy source (wind),
- Technology type (onshore wind turbines),
- Grid connection principle,
- Baseline scenario,
- Applied methodology (ACM0002 Version 22.0),
- Emission factor.

The project continues to displace electricity from the Turkish national grid in accordance with ACM0002.

In accordance with Gold Standard for the Global Goals (GS4GG) requirements for design changes involving capacity increases, Gold Standard certification is limited to a maximum installed capacity increase of 20% over the originally registered installed capacity.

Originally registered capacity: 38.5 MWm

Maximum eligible capacity under Gold Standard:

$$38.5 \text{ MWm} \times 1.20 = 46.2 \text{ MWm}$$

Accordingly, emission reductions will be calculated only for the eligible installed capacity (46.2 MWm). Any installed capacity beyond this threshold will remain outside the Gold Standard certification boundary and will not generate VERs.

The monitoring and attribution approach ensuring conservative allocation of electricity generation to the eligible capacity will be described in the Monitoring section of this PDD. Emission reductions associated with the eligible installed capacity following the capacity increase are quantified in Section B (Estimation of Emission Reductions) of this PDD, taking into account the phased implementation within the ongoing crediting period.

Turkish Electricity System Context:

Electricity supplied by Şadılı WPP displaces electricity that would otherwise be generated within the Turkish national grid.

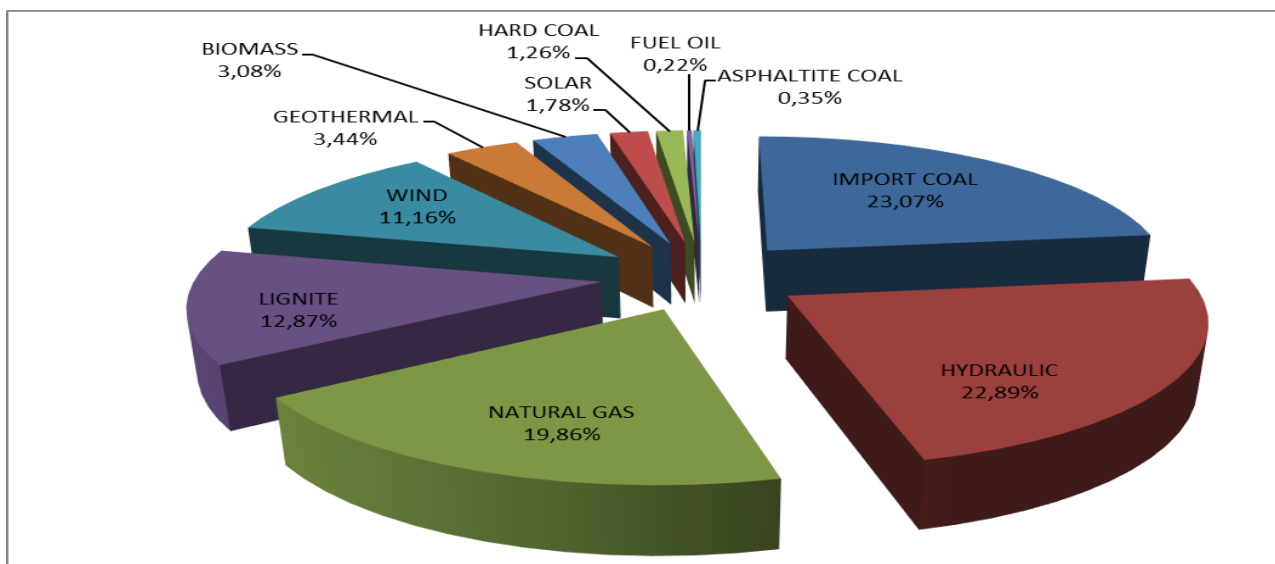


Figure 2: Distribution of Licensed Electricity Generation by Sources in 2024

As illustrated in Figure 2, fossil fuel-based electricity generation continues to represent a substantial share of total generation in Türkiye. Thermic sources including imported coal, natural gas, lignite, hard coal and fuel oil constitute more than half of total electricity generation, while wind energy accounts for approximately 11% of licensed electricity production.

Although Türkiye has strong wind resource potential, substantial land availability, and a developed electricity infrastructure, fossil fuel-based generation continues to play a dominant role in the electricity mix. Therefore, additional wind-based generation from projects such as Şadıllı WPP results in measurable emission reductions through displacement of fossil fuel-based generation.

Renewable Energy Investment Context:

Wind power investments and capacity expansions in Türkiye require significant upfront capital expenditure, particularly due to:

- High turbine procurement and installation costs,
- Dependence on imported equipment and components,
- Grid connection constraints in high-wind regions,
- Exposure to market and regulatory conditions affecting long-term revenue stability.

Capacity increase investments are capital intensive while operating under the same wholesale electricity market framework as the original project. In this context, carbon certification under the Gold Standard provides an additional revenue stream that

contributes to the financial robustness and long-term operational sustainability of renewable energy investments.

A.4 Scale of the project

Since the installed capacity of the project per license issued by EMRA (Energy Market Regulatory Authority) was originally 33.0 MWe and 38.5 MWm, consisting of 14 turbines (14 × 2.75 MWm), Şadıllı WPP is classified as a large-scale project.

Following the approved capacity expansion, the total installed capacity of the project has increased in accordance with the amended generation license. However, the project remains classified as a large-scale renewable energy project under Gold Standard requirements.

A.5 Funding sources of project

The project activity does not have any public funding or Official Development Assistance (ODA) funding.

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

B.1. Reference of approved methodology (ies)

For the determination of the baseline, the approved methodology under Gold Standard, ACM0002 version 22.0, "Grid-connected electricity generation from renewable sources"², is applied, using conservative options and data as presented in the following section. This methodology refers to four Tools, which are:

1. Tool to calculate the emission factor for an electricity system (Version 07.0.0)³;
2. Tool for the demonstration and assessment of additionality (Version 07.0.0)⁴;

² <https://cdm.unfccc.int/methodologies/DB/XB1TX7TAZ6SLWM9B7BC67THHVD16JV>

³ https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-07-v7.0.pdf/history_view

⁴ https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-01-v5.2.pdf/history_view

3. Tool to determine the remaining lifetime of equipment (Version 1)⁵;
4. Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period (Version 03.0.1)⁶

B.2. Applicability of methodology (ies)

The applicability conditions of ACM0002 v22.0 and the applied tools are assessed below.

Applicability Condition	Justification
The project activity involves a capacity addition to an existing grid-connected renewable energy power plant.	The Design Change consists of a capacity increase of the existing Şadıllı Wind Power Plant through the installation of additional wind turbines within the same project boundary.
The project activity is a wind power plant/unit.	The project generates electricity exclusively from wind energy and therefore falls under the renewable energy technologies explicitly covered by ACM0002 v22.0.
The project activity is connected to an electricity grid.	The project supplies electricity to the Turkish national grid through the existing grid connection infrastructure.
For capacity addition projects, the existing plant/unit shall have started commercial operation prior to the start of the minimum historical reference period of five years.	The existing Şadıllı Wind Power Plant commenced commercial operation well before the start of the applicable historical reference period and therefore satisfies this requirement.
For capacity addition projects, no previous capacity expansion, retrofit or rehabilitation shall have been undertaken between the start of the	No capacity expansion, retrofit or rehabilitation affecting the applicability of ACM0002 has been undertaken during the relevant historical reference period

⁵ https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-10-v1.pdf/history_view

⁶ https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-11-v3.0.1.pdf/history_view

historical reference period and implementation of the project activity.	prior to implementation of the present Design Change.
The project activity is not a biomass-fired power plant/unit.	The project utilizes wind energy only and does not involve biomass combustion.
The project activity does not involve switching from fossil fuels to renewable energy sources at the project site.	The project is a wind power plant and does not involve fuel switching from fossil fuels to renewable energy sources.
The project activity is not a hydro power plant requiring application of specific reservoir-related provisions.	The project is a wind power plant and therefore hydro-specific applicability conditions are not relevant.
The project activity is the installation, capacity addition, retrofit, replacement or rehabilitation of a grid-connected renewable power plant/unit.	The Design Change involves a capacity increase of the existing Şadılı Wind Power Plant, which is a grid-connected renewable electricity generation project utilizing wind energy.
The project activity generates electricity using renewable energy sources.	Electricity is generated solely from wind energy, which is a renewable energy source.
The project activity is not a renewable energy project involving co-firing of fossil fuels.	No fossil fuels are used in the electricity generation process.

The “Tool to calculate the emission factor for an electricity system” (TOOL07) is applied for determination of the Operating Margin (OM), Build Margin (BM) and Combined Margin (CM) emission factors used in baseline emission calculations. The project supplies renewable electricity to the Turkish national grid and displaces electricity that would otherwise be generated by grid-connected power plants. Therefore, TOOL07 is applicable to the project activity.

B.3. Project boundary

As per the Approved Large Scale Consolidated Methodology ACM0002, the project boundary is defined as:

“The spatial extent of the project boundary includes the project power plant and all power plants connected physically to the electricity system to which the CDM project power plant is connected.”

Accordingly, for this project activity, the project boundary includes the project site and all power plants connected to the Turkish National Grid.

Following the planned capacity expansion, the additional turbines remain within the same project site and are connected to the same Turkish National Grid. Therefore, the spatial and system boundaries of the project remain unchanged.

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

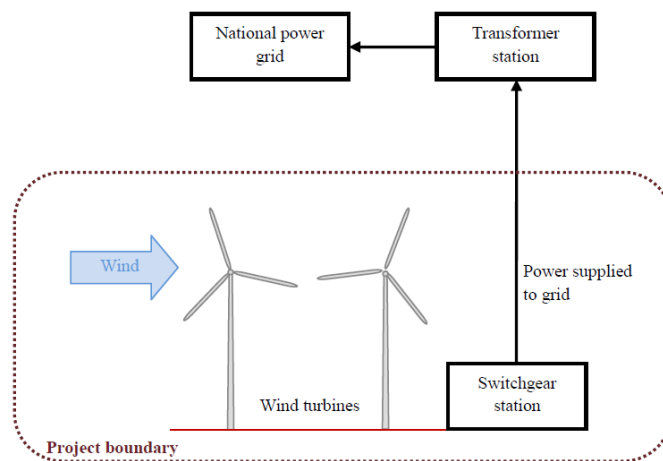


Figure 3: Project Boundary

A general operation diagram of the project is given in Figure 4.

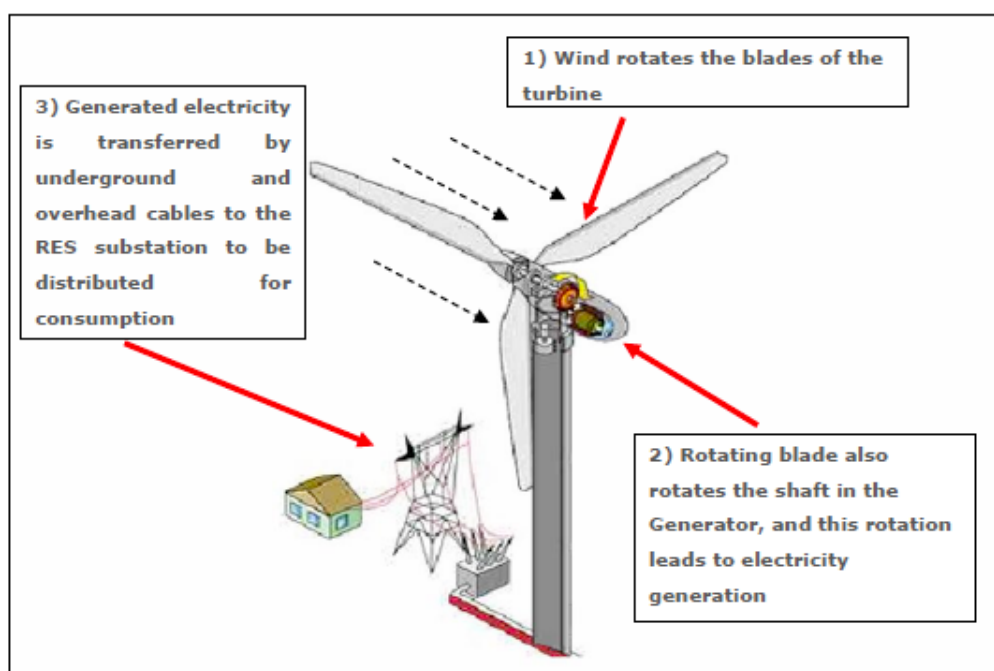


Figure 4: Operation diagram of the project

Based on the above operation diagram, the baseline and project activity related greenhouse gases which are considered in baseline calculation are given below, in Table 4:

Table 4: Emissions sources included in or excluded from the project boundary

Source	GHGs	Included?	Justification/Explanation	
Baseline scenario	Emissions from Electricity generation in fossil fuel fired power plants that are displaced due to the project activity	CO ₂	Yes	Main emission source: Fossil fuels fired for electricity generation cause CO ₂ emissions. It is included to baseline calculation to find the displaced amount by the project activity.
		CH ₄	No	Minor emission sources: Even though there may be some CH ₄ and N ₂ O emissions during electricity generation, these emissions are negligible and not included in baseline calculation to be conservative and comply with Table-1 of the methodology (ACM0002 v22.0) (page 5).
		N ₂ O	No	
Project	Emissions during construction and	CO ₂	No	Project emissions from the construction, operation and maintenance of the wind power plant are considered negligible and
		CH ₄	No	

operation of the project activity	N ₂ O	No	are therefore excluded from the project boundary in accordance with ACM0002. Consequently, CO ₂ , CH ₄ and N ₂ O emissions are not accounted for.
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B.4. Establishment and description of baseline scenario

The baseline scenario is identified according to the “Baseline Methodology Procedure” of ACM0002 ver. 22.0.

The project activity involves the installation of a grid-connected wind farm and the subsequent capacity expansion of the existing wind power plant. It is not a modification or retrofit of an existing fossil fuel-based grid-connected power plant.

Accordingly, the identification of the baseline scenario remains consistent with ACM0002, under which electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the Combined Margin (CM) calculation of the Ministry of Energy and Natural Resources of Türkiye.

The methodological tool “Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period” (Version 03.0.1) is adopted to assess the continued validity of the baseline and to update the baseline. This tool provides a stepwise procedure to assess the continued validity of the baseline and to update the baseline at the renewal of a crediting period, as required by paragraph 49(a) of the modalities and procedures of the Clean Development Mechanism. According to this tool, the following steps are applied.

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

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

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

The project baseline is the “Grid-connected electricity generation from renewable sources”. It is in compliance with the current legal framework. There are no additional laws that have come into force that have an impact on the project activity, and the project activity is still in line with the applicable laws and regulations.

Step 1.2 Assess the impact of circumstances.

The grid emission factor applied during the second crediting period remains unchanged for the purpose of this Design Change, as no renewal of the crediting

period is being requested and the baseline scenario remains the supply of electricity from the Turkish National Grid. There has been no major deviation or change in the market characteristic during the first crediting period.

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

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

The planned capacity expansion of the project does not alter the identified baseline scenario, as the baseline remains the supply of electricity from the Turkish National Grid. The expansion represents an increase in renewable electricity generation capacity and does not introduce any new baseline alternative.

Step 1.4 Assessment of validity of the data and parameters.

The emissions reduction calculations are based on two main parameters: the energy produced and the grid emission factor. The latter remains unchanged for the Design Change and continues to be applied consistently with the approved emission factor determined at the renewal of the second crediting period. As a requirement of the methodology, only the grid emission factor has been updated during the second crediting period renewal.

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

Step 2.1: Update the current baseline

As confirmed in Step 1, under the current context of the sectoral policies and circumstances, the project baseline for the next crediting period is the use of electricity from the national grid. This conforms to the provisions of the latest version of the approved applicable methodology to the project activity namely: ACM0002 version 22.0, "Grid-connected electricity generation from renewable sources".

Step 2.2: Update the data and parameters

The grid emission factor applied in this Design Change continues to be the emission factor determined at the renewal of the second crediting period and is applied

consistently in accordance with the Tool to calculate the emission factor for an electricity system (Version 07.0).

To describe the baseline and its development for the project activity, long-term electricity demand and supply projections for Türkiye are assessed. Demand for electricity in Türkiye is growing rapidly with average 4.2%¹³ for previous ten years. TEİAŞ, which is responsible for grid reliability, has prepared an electricity demand projection for next ten years period (2019-2028) for Türkiye and announced on July 2019, given in Table 5 and Figure 5, reflecting the continuation of current demand growth.

Table 5: Low and High Demand Projection Scenarios for Ten Years Period (TWh)

Scenarios	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
High Scenario	316,503	332,057	348,662	366,385	385,177	404,287	422,303	440,654	458,917	477,553
Low Scenario	313,832	327,285	340,511	353,200	366,767	380,401	392,610	404,628	416,619	428,791

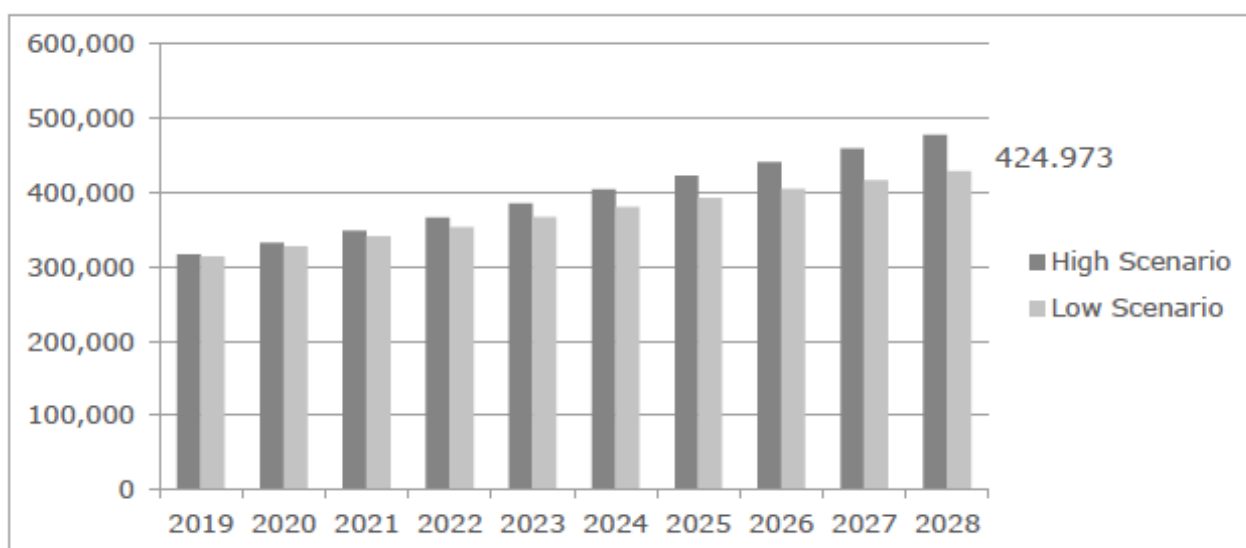


Figure 5: Electricity Demand Projections for Ten Years

In this projection, electricity supplies are also forecasted taking into account all power plants, which are operational, under construction and newly licensed. Generation projection based on project generation is given in Figure 6.

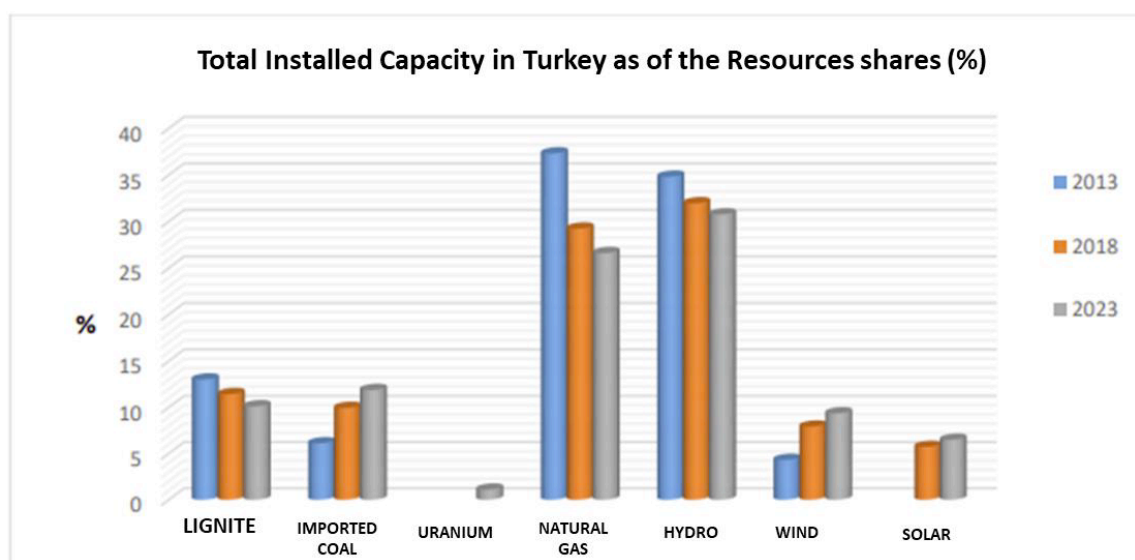


Figure 6: Total Installed Capacity in Türkiye as of the Resources shares (%)

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

Table 6: By Primary Energy Resources, Installed Capacity of Türkiye (2008-2018)

Unit :MW										
	Coal	Fuel Oils	Natural Gas	RES+Waste+Waste Heat	Multi Fuel	Hydro	Geothermal	Wind	Solar	TOTAL
2008	10,191	1,818.6	10,656.8	59.7	4,869.0	13,828.7	29.8	363.7	-	41,817.2
%	24.37	4.35	25.48	0.14	11.64	33.07	0.07	0.87	-	100.00
2018	18,997.4	294.0	22,665.9	811.2	4,140.2	28,291.4	1,282.5	7,005.4	5,062.8	88,550.8
%	21.45	0.33	25.60	0.92	4.68	31.95	1.45	7.91	5.72	100.00

Based on the analysis presented in Table 6 for the baseline scenario (continuation of the current situation), the following conclusions can be drawn:

- **Conclusion-1:** Energy demand in Türkiye has been increasing significantly over the past decade and is expected to continue increasing in the coming years.

- **Conclusion-2:** Even when operational plants, plants under construction and licensed projects are taken into account, supply constraints may occur in the medium to long term. Therefore, there remains a significant need for electricity generation investments to satisfy demand. In the absence of the project activity, electricity generated by Şadıllı WPP would otherwise be generated by new grid-connected power plants.

- **Conclusion-3:** Fossil fuels continue to hold a significant share in the generation mix. Although renewable capacity has increased in recent years, fossil fuel-based power plants remain a substantial contributor to electricity generation. This indicates that, without renewable energy projects such as Şadıllı WPP, additional electricity demand would likely be met by fossil fuel-fired power plants.

The combination of the aforementioned trends indicates that the continuation and expansion of electricity generation from Şadıllı WPP contributes to reducing the need for generation from new grid-connected thermal power plants.

B.5. Demonstration of additionality

For the explanation of how and why the project activity leads to emission reductions that are additional to what would have occurred in the absence of the project activity, the Baseline Methodology refers to the consolidated “Tool for the demonstration and assessment of additionality” (Version 7.0.0), which defines a step-wise approach to be applied to the proposed project.

Additionality was demonstrated at the time of the first validation in accordance with the applicable version of the Tool.

In light of the planned capacity expansion, the investment and barrier analysis will be reassessed to confirm the continued additionality of the project activity in accordance with the applicable version of the Additionality Tool.

Step 1. Identification of alternatives to the project activity consistent with current laws and regulations

Sub-step 1a. Define Alternatives to the project activity

To identify the realistic and credible alternative scenario(s) for project participants, the scenarios identified in the Tool are assessed:

a) The proposed project activity undertaken without being registered as a GS VER project activity

This alternative is realistic and credible, as Şadıllı may undertake the project activity if it considers the investment sufficiently attractive without GS VER credit income.

However, as demonstrated in Step 3 of the additionality assessment, the project is not economically feasible in the absence of GS VER revenues. The expected return on investment without the additional income from carbon credits does not meet the required investment benchmarks. Therefore, implementation of the project without GS VER registration is considered financially unattractive.

For the purpose of this assessment, the proposed project activity includes the planned capacity expansion. The same conclusion applies to the expanded configuration of the project, as the overall investment viability remains dependent on the additional revenue stream provided by GS VER credits.

b) Other realistic and credible alternative scenario(s) to the proposed GS VER project activity scenario that deliver electricity with comparable quality, properties and application areas, taking into account, where relevant, examples of scenarios identified in the underlying methodology

The project activity is renewable power generation without greenhouse gas emissions, harnessing wind energy. As a private entity, Şadılı is not obliged to undertake power generation investments. Furthermore, Şadılı holds a license specifically for wind power investment, and there are no alternative renewable resources such as hydro or other viable electricity generation sources within the project area. Therefore, other project activities delivering electricity with comparable characteristics at the same site are not considered realistic for the project participant.

c) Continuation of the current situation, i.e. Şadılı WPP would not have built

The decision in favour of or against a project investment depends on expected revenues and risks, as for any private investment. This alternative is also realistic and credible.

According to the baseline scenario described in Section B.4, there is a continuing need for electricity generation investments to meet growing demand. In the absence of the project activity, the equivalent amount of electricity would be generated by other grid-connected power plants in accordance with the baseline defined under ACM0002 version 22.0. Based on national projections, fossil fuel-based generation continues to represent a significant share of the electricity mix.

In the absence of the project, electricity would be produced by new and existing power plants in line with the baseline scenario under ACM0002.

Outcome of Step 1.a: Therefore, two realistic and credible alternative scenarios are identified for the project activity:

a) The proposed project activity undertaken without being registered as a GS VER project activity.

b) Continuation of the current situation, i.e. the project (including its planned capacity expansion) would not be implemented.

Sub-step 1b. Consistency with mandatory laws and regulations

Both alternatives are (building or not building the project activity) in compliance with the following identified applicable mandatory laws and regulations:

Relevant Laws	Number/Enactment Date	Aim and Scope
Environmental Law *Environmental Impact Assessment Regulation	Nr. 2872/17/07/2008	The approval is requested for power plants from Ministry of Environment and Forest as Electricity Licence Regulation requests project to be in line with the environmental law
Electricity Market Law *Electricity Licence Regulation *Electricity Market Balancing and Conciliation Regulation	Nr. 4628/03/03/2001	procedures of electricity generation, transmission, distribution, wholesale, retail for legal entities. Two regulations issued under the law; one for generation licence and the other for market price balancing and conciliation
Law on Utilization of Renewable Energy Resources for the Purpose of Generating Electrical Energy	Nr. 5346/18/05/2005	Aims to extend the utilization of renewable energy for electricity generation and identifies method and principles for power generation from renewable resources in an economical and conservative manner as well as certification of the electricity generated from renewable resources
Energy Efficiency Law	Nr. 5627/02/05/2007	Identifies method and principles for industry, power plants, residential buildings and transport to imply necessary measures for energy efficiency during electricity generation, transmission, distribution and consumption

According to Turkish regulations, to get necessary permits for further project implementation, license issued by EMRA is required. Hence, issuance of license cannot

be considered as 'Project Start Date' but a prerequisite to proceed for further project development activities. The starting date of the Project activity is 28/02/2012. This is the fourth wind farm of the same Project owner, and the first three projects are registered with the Gold Standard. Therefore, the Project owner was well aware of carbon finance before the starting date of the Project activity, demonstrating prior consideration of carbon credits. The bank statement regarding the inclusion of carbon income, which is before the starting date of the Project activity, further demonstrates prior consideration of carbon credits. Moreover, an internal meeting memo dating prior to Project starting date clearly demonstrates that carbon finance has been one of the key drivers in the decision of going forward with the project. In the following, the investment analysis is applied to clearly demonstrate that the project activity is unlikely to be financially/economically attractive without the revenue from the sale of VERs.

Outcome of Step 1.b: Şadılı complies with all applicable mandatory laws and regulations. Project implementation schedule shows us that Şadılı started to consideration of VER from the beginning of the project implementation and VER Revenue has decisive impact on decision of proceeding to the project.

Step 2. Investment analysis

"Guidelines on the assessment of investment analysis" version 5 is taken into account when applying this step.

Sub-step 2a: Determine appropriate analysis method

Three options can be applied for the investment analysis: the simple cost analysis, the investment comparison analysis and the benchmark analysis.

	Investment Analysis Options	Explanation
Option (I)	Simple cost analysis	Not applicable to the project because the project activity generates the revenue from the sales of electricity generation.
Option (II)	Investment comparison analysis	Not applicable because an investment comparison analysis shall be used if the proposed baseline scenario leaves the project participant no other choice than to make an investment to supply the same (or substitute) products or services.
Option (III)	Benchmark analysis	This option is chosen.

To conclude, ACM0002 provides three options for the investment analysis. The benchmark analysis option is selected because more than one alternative remains after Step 2.

Sub-step 2b: Option III. Apply Benchmark analysis

The likelihood of the development of this Project will be determined by analyzing its “Real Project IRR” based on the scenarios with and without the sale of carbon credits. The chosen benchmark for the Project is the (pre-tax) WACC, as the CDM “Guidelines on the Assessment of Investment Analysis” v.5.

Sub-step 2c: Calculation and comparison of the IRR

The following financial figures are used for calculations;

Table 7: Parameters used for benchmark analysis

Parameter	Figure	Source / Justification
Discount rate (WACC)	8.69%	Calculated as WACC
Electricity Price/kWh	5.4 EUR cents/kWh	Guaranteed electricity sales price in Türkiye (7.3 USD cents/kWh converted to EUR)
Capital Expenditure	44,413 TEUR	Benchmark with another wind farm of PP
Capital Expenditure for capacity addition	5,685 TEUR	Cashflow analysis with data of another wind farm of PP
O&M Costs	1,574 TEUR/a	Benchmark with another wind farm of PP
O&M Costs	294 TEUR/a	Cashflow analysis with data of another wind farm of PP
Royalty Payment	1,463 TEUR/a	Contract with TEIAS
Royalty Payment for capacity addition	293 TEUR/a	Contract with TEIAS
Investment horizon	20 years	Aligned with GS4GG Guidelines on the Assessment of Investment Analysis (minimum 10 years, maximum 20 years).
Corporate tax (CT) rate	25%	General corporate tax rate in Türkiye as of 2026, per Kurumlar Vergisi Kanunu No. 5520, Article 32 (Source: Turkish Revenue Administration, GİB)
Equity (E) / Debt (D) ratio	20/80	Min. Equity required by EMRA
Power Generation	112,000 MWh/a	Feasibility Study
	134,400 MWh/a (Gold Standard capacity increase cap = $1.2 \times 112,000$ MWh registered generation; not a feasibility-based generation forecast for the	Gold Standard cap ($1.2 \times 112,000$ MWh registered generation)

	expanded plant)	
Feasibility-based generation of eligible capacity (7.7 MW)	~23,900 MWh/a ⁷	Fiba_Wind Extension Cashflow (P75 net production, 7.7 MW × ~3,103 MWh/MW/yr)

Table 7a: Parameters for the Full Investment Additionality Test (36.0 MWm)

Parameter	Figure	Source / Justification
Actual installed capacity of capacity increase	36.0 MWm	6 × GW165-6.0 turbines; consistent with Fiba_Wind Extension Cashflow (36.0 MWm)
Capital Expenditure (36.0 MWm)	29,916,957.57 USD	Itemised capex budget for the 36 MWm capacity increase
Power price	62.56 USD/MWh	Derived from the guaranteed YEKDEM feed-in tariff (7.3 USD cent/kWh)
Investment horizon	20 years	Aligned with GS4GG Guidelines on the Assessment of Investment Analysis
Corporate tax rate	25%	"Kurumlar Vergisi Kanunu" No. 5520, Article 32 (Source: Turkish Revenue Administration, GİB)
Discount rate (benchmark)	8.69%	Pre-tax WACC, recalculated with the 25% corporate tax rate

Table 7b: Results of the Full Investment Additionality Test

Scenario	Project IRR
With carbon credits	8.01%
Without carbon credits	7.87%
Benchmark discount rate	8.69%

Both scenarios result in a Project IRR below the benchmark discount rate, even when assessed on the basis of the full 36 MWm capacity increase (i.e. the actual investment decision), rather than only the Gold Standard-eligible 7.7 MWm share. This demonstrates that the capacity increase would not have been financially attractive without the additional revenue from the sale of carbon credits, supporting the additionality of the project activity under either basis of assessment.

⁷ Derived from the Fiba_Wind Extension Cashflow worksheet: P75 net production for the new 36 MWm capacity = 111,700 MWh/yr (row 12, "Net production P75 (MWh)"), i.e. 111,700 / 36 = 3,102.8 MWh/MWm/yr. This yield rate is applied to the Gold Standard-eligible 7.7 MWm capacity increase (Capacity Increase worksheet: 38.5 MWm × 20% = 7.7 MWm): 7.7 × 3,102.8 ≈ 23,891 MWh/yr (~23,900 MWh/a).

The discount rate (WACC) which is selected as the benchmark value is calculated with the following formulas:

$$\text{WACC} = (E/(E + D)) * \text{Cost of Equity} + D/(E + D) * \text{Cost of Debt} (1 - \text{CT}) \quad [1]$$

$$\text{WACC}_{\text{pretax}} = \text{WACC} / (1 - \text{CT}) \quad [2]$$

Financial expenditures are not considered in the calculations. The Project IRR calculations are carried out for both scenarios with and without considering carbon credits. The calculations conservatively assume that the revenues from electricity sales are obtained without delay, that there are no major unforeseen malfunctions and that wind properties will be as expected. The results are provided below;

Table 8: Comparative table of the financial indicators with and without carbon revenues

Scenario	Real Project IRR
With carbon credits	2.92%
Without carbon credits	2.77%
Benchmark discount rate	8.69%

The Project IRR remains below the benchmark rate both with and without carbon credits. The results indicate that without carbon credits, the financial performance of the Project is not feasible. Under these circumstances, the Project would not be attractive for the investor.

Sub-step 2d: Sensitivity analysis

The purpose of the sensitivity analysis is to examine how the uncertainty of a single variable such as total investment cost and net power output will have an impact on the Project IRR. According to "Guidelines on the Assessment of Investment Analysis", paragraph 20, only variables that constitute more than 20% of either total project costs or total project revenues should be subjected to sensitivity analysis. Only electricity prices, capital investment and O&M costs are the parameters that influence cash flow by more than 20%. The assumptions set in the analysis process are increasing/decreasing $\pm 15\%$ from the original level of the parameters. The following parameters are identified which would have a significant impact on the financial results;

- a) Electricity prices,
- b) Capital expenditure,
- c) Operation and maintenance costs.

The results are shown in the figure below;

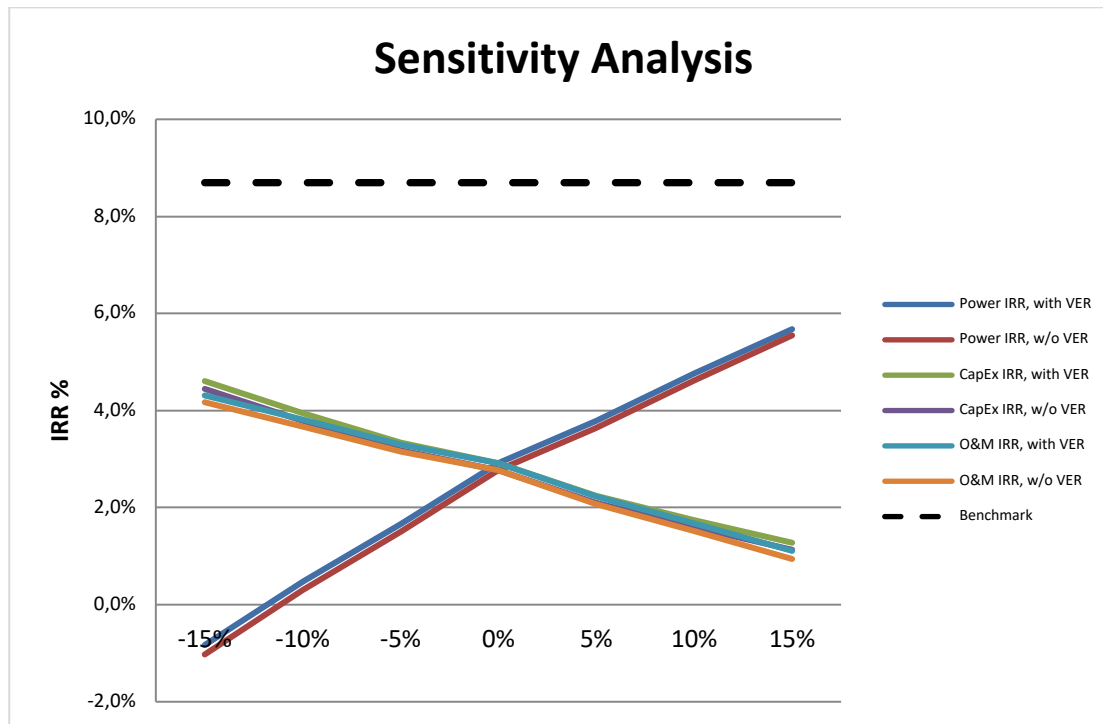


Figure 7: Results of the sensitivity analysis

Here it can be seen that all parameters selected for the sensitivity analysis, i.e. power sales, CapEx and operational expenses have all considerable impact on the Project IRR. The results indicate the following:

- Even if the electricity price or power generation would increase by 15%, the Project would stay unfeasible. The electricity price at which the Project IRR is equal to the benchmark is 6.73 EUR cents/kWh, which represents a 24% increase relative to the baseline electricity price. This is significantly higher than the market price and the guaranteed tariff for renewable energy in the host country.
- Even if the capital expenditures would decrease by 15%, the Project would stay unfeasible. The breakeven point for CapEx is reached at a 31.5% decrease relative to the baseline CapEx. It is considerably lower than the expected investment cost. Such a change is not realistic.

c) Even if the operational and maintenance costs, or the annual royalty payments to TEIAS would decrease by 15%, the Project would stay unfeasible. The breakeven point for O&M costs is negative, which is not realistic.

Within the reasonable variation of the CapEx, price of electricity and O&M costs, the calculated IRRs are below the benchmark IRR, thus the Project remains economically unfeasible without carbon revenues. This demonstrates that the proposed Project activity is not the most economically or financially attractive and not financially feasible without the revenue from the sale of carbon credits.

Outcome of Step 2: The proposed Project activity is unlikely to be the most financially/economically attractive.

Step 3. Barrier analysis

The investment analysis has fully demonstrated and explained the additionality of the project, so step 3 is skipped.

Step 4: Common Practice Analysis

The section below provides the analysis as per step 4 of the "Tool for the demonstration and assessment of additionality", version 7.0.0 and according to the Guidelines on Common Practice version 02.0

For the purpose of this assessment, the design capacity of the proposed project activity is considered as the total physical installed capacity of the wind farm following the capacity increase (74.5 MW), rather than the Gold Standard-eligible crediting capacity (46.2 MW). This basis is used because the Common Practice step compares the proposed project against other real, physically operating power plants in the applicable geographical area; the Gold Standard eligible capacity is an administrative crediting boundary specific to this certification and is not representative of the plant's actual physical scale for comparison purposes. The robustness of this choice against alternative capacity bases is demonstrated in Table 9 below.

Substep 1. Calculate applicable capacity or output range as +/-50% of the total design capacity or output of the proposed project activity:

Only the projects that have a capacity between +/-50% of

74.5 MW, i.e. between 37.25 MW and 111.75 MW, are considered.

Substep 2. Identify similar projects (both CDM and non-CDM) which fulfil all of the following conditions:

In the applicable geographical area, identify all plants that deliver the same output or capacity, within the applicable output range calculated in Substep 1, as the proposed

project activity and have started commercial operation before the start date of the project. Note their number N_{all} . Registered CDM project activities and project activities undergoing validation shall not be included in this step.

Public power plants and carbon projects are left out. The number of remaining power plants, N_{all} , is 67.

Substep 3: Within plants identified in Step 2, identify those that apply technologies different that the technology applied in the proposed project activity. Note their number N_{diff} :

The proposed project activity is wind power generation. Within the plants identified in Substep 2, the number of power plants that are not wind farms (N_{diff}) is 54.

Substep 4: Calculate factor $F=1-(N_{diff}/N_{all})$ representing the share of plants using technology similar to the technology used in the proposed project activity in all plants that deliver the same output or capacity as the proposed project activity:

$$F = 1 - (54/67) = 0.19403$$

$$N_{all}-N_{diff} = 67 - 54 = 13$$

Substep 5: Calculate factor $F=1-N_{diff}/N_{all}$ representing the share of similar projects (penetration rate of the measure/technology) using a measure/technology similar to the measure/technology used in the proposed project activity that deliver the same output or capacity as the proposed project activity:

$$F = 1-N_{diff}/N_{all}$$

$$= 1 - (54/67)$$

$$= 0.19403$$

Table 9: Robustness of the Common Practice result against alternative capacity bases

Capacity basis	Range ($\pm 50\%$)	N_{all}	N_{diff}	F	Result
74.5 MW (total installed, used above)	37.25–111.75 MW	67	54	0.194	Not Common Practice
46.2 MW (GS-eligible capacity)	23.1–69.3 MW	96	80	0.167	Not Common Practice
36.0 MW (new capacity, MWm)	18.0–54.0 MW	118	101	0.144	Not Common Practice

As shown above, the "Not Common Practice" conclusion holds under all plausible capacity bases, confirming that the result is not sensitive to the choice of capacity basis.

The proposed project activity is a common practice within a sector in the applicable geographical area if both the following conditions are fulfilled:

- a) The factor F is greater than 0.2, and
- b) $N_{all}-N_{diff}$ is greater than 3.

For the proposed project activity, the factor F is 0.19403, which is not greater than 0.2. Although $N_{all}-N_{diff}$ equals 13 ($67 - 54$), which is greater than 3, both conditions are not fulfilled simultaneously. Therefore, the proposed project activity is not a common practice as per the guidelines. The proposed project activity is therefore additional under common practice analysis.

B.5.1 Prior Consideration

This Project Activity represents a capacity increase (Design Change) of the originally registered Şadılı Wind Power Plant.

Carbon revenue has been considered as part of the financial planning for the capacity increase. A Local Stakeholder Consultation Meeting (LSCM) for the capacity increase was held on 09 March 2026, in line with the Stakeholder Consultation and Engagement Requirements applicable to design changes. No objections to the project or its continuation were raised during the consultation.

Accordingly, prior consideration of carbon revenue is satisfied for this Design Change. Further detail on the meeting, including participant feedback, is provided in the Stakeholder Consultation Report prepared for this Design Change.

B.5.2 Ongoing Financial Need

This alternative is realistic and credible as Şadılı WPP may undertake project activity if it sees no risk for project and/or if the project turns out to be financially attractive without GS VER credit income. However, investments analysis shows that the project is not economically feasible without GS VER credit income. Moreover, the sensitivity analysis confirms that the proposed project activity is unlikely to be economically attractive without the revenues from VERs. Consequently, the project activity is additional, it has still ongoing financial need.

Conclusion: The project activity satisfies all the criteria of "Tool for the demonstration and assessment of additionality". Therefore, the project is additional, it has still ongoing financial need.

B.6. Sustainable Development Goals (SDG) outcomes

Relevant Target/Indicator for each of four SDGs

SUSTAINABLE DEVELOPMENT GOALS TARGETED	MOST RELEVANT SDG TARGET	SDG IMPACT
		INDICATOR (PROPOSED OR SDG INDICATOR)
SDG 13: Climate Action (mandatory)	Target 13.2: Integrate climate change measures into national policies, strategies and planning	Indicator 13.2.2: Total greenhouse gas emissions per year
SDG 7: Affordable and clean energy	Target 7.2: By 2030, increase substantially the share of renewable energy in the global energy mix	Indicator 7.2.1: Renewable energy share in the total final energy consumption
SDG 8: Decent work and economic growth	Target 8.8: Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment	Indicator 8.8.2: Level of national compliance with labour rights based on International Labour Organization textual sources and national legislation, by sex and migrant status
SDG 6: Clean water	Target 6.3: By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally	Indicator 6.3.1: Proportion of domestic and industrial wastewater flows safely treated

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

- **SDG 7**

Firstly, the project helps to accelerate the growth of the wind power industry and stimulates the design and production of renewable energy technologies in Türkiye. The capacity increase further strengthens this contribution by expanding renewable generation within the existing project boundary.

The project contributes to reducing Türkiye's increasing energy deficit and diversifying the electricity generation mix while reducing import dependency, particularly on natural gas. Rural development in the areas surrounding the project site is supported through infrastructure investments and long-term operational activities.

Under the Design Change, emission reductions are calculated for the eligible installed capacity (46.2 MW). Accordingly, the project is expected to generate 134,400 MWh annually, corresponding to a 20% increase over the originally registered generation.

The project contributes to the indicator 7.2.1 – "Renewable energy share in total final energy consumption" and, supports the target 7.2 – "By 2030, increase substantially the share of renewable energy in the global energy mix".

Balance of Payments and Investment:

With 134,400 MWh of annual electricity generation, the project is expected to avoid approximately 5,528,573 m³ of natural gas imports per year. This corresponds to an estimated economic value of approximately 1,864,788 EUR per year. This co-benefit contributes to SDG Target 1.1 (eradication of extreme poverty) via indicator GSDM-I1.1.1, reflecting the estimated national currency savings associated with avoided natural gas imports.

The avoided natural gas calculation is linearly scaled based on the 20% increase in eligible electricity generation.

Annual avoided natural gas import will be calculated as follows:

Annually Avoided Natural Gas Import

$$= \text{Net Annual Electricity Generation of Project Activity} \left[\begin{array}{l} * \text{Amount of Natural Gas Combusted for Electricity Generation} \\ * \text{Import Share of Natural Gas Consumption in Türkiye} \end{array} \right] ^$$

Value Avoided Imported Natural Gas by Project Activity (EUR) will be calculated as follows:

Value of Avoided Imported Natural Gas (€)

$$= \text{Amount of Avoided Imported Natural Gas by Project Activity (m}^3\text{)} \left[\begin{array}{l} * \text{Price of Gas in Türkiye (€ / m}^3\text{)} \\ * \text{ExchangeRate (€ / ₺)} \end{array} \right] ^$$

● **SDG 8**

The employment of local people with the necessary technical qualifications is prioritised and supported through all project activities during the operation of the wind farm. As a result, local poverty and unemployment are partially reduced through

increased job opportunities and project-related business activities. Construction materials for foundations, cables and other auxiliary equipment are preferentially sourced locally whenever feasible.

Moreover, as a contribution to the welfare of the region, the quality and reliability of electricity consumed in the area are improved through local electricity production, which also contributes to reducing distribution losses.

The project creates employment opportunities that would not have occurred under the baseline scenario. During the operation phase, the project provides employment to between 5 and 15 persons. This contribution remains valid for the continued operation of the project, including the planned capacity expansion.

The project contributes to SDG Target 8.8 (Protect labour rights and promote safe and secure working environments) and Indicator 8.8.2.

Furthermore, between 5 and 15 employees receive regular training on occupational health and safety during each monitoring period. Training records and/or certificates will be made available during each monitoring period.

● **SDG 6**

The project activities replace grid electricity, which is generated from fuel sources that cause greenhouse gas emissions and require significant water use, particularly in thermal power plants. By displacing fossil fuel-based generation, the project contributes to water conservation and reduces wastewater discharge associated with thermal electricity production.

Under the Design Change, emission reductions and associated SDG impacts are calculated for the eligible installed capacity (46.2 MW), corresponding to an annual electricity generation of 134,400 MWh (134.4 GWh).

According to the most recent Water and Wastewater Statistics (2024) published by the Turkish Statistical Institute (TÜİK)⁸, thermal power plants continue to account for a substantial share of national wastewater discharge. This confirms that thermal electricity generation remains a significant source of water use within the Turkish electricity system.

For the purpose of SDG impact estimation, the Project applies the previously established national proxy value derived from the 2024 official dataset, ensuring methodological consistency across crediting periods.

⁸ <https://veriportali.tuik.gov.tr/en/press/49607>

Average Amount of Wastewater Discharged per each GWh Electricity Generation

= 45.47 m³/GWh (based on national wastewater and electricity generation statistics for 2024)

Then,

Amount of Avoided Cooling Wastewater Discharge per year

= 134.4 GWh × 45.47 m³/GWh

= 6,111.17 m³ per year

Domestic Wastewater Discharge:

In addition to avoided cooling wastewater discharge from thermal power plants, the project activity generates domestic wastewater during its operational phase due to personnel presence at the site.

The amount of domestic wastewater discharged by the project activity is calculated using the following approach:

Average Daily Wastewater Discharge per Person = 0.150 m³/day (based on official statistics published by TÜİK)

Amount of Domestic Wastewater Discharged per Year = Number of Employees

× Average Daily Wastewater Discharge per Person × 365 days

Assuming the project employs at least 10 personnel during operation:

Amount of Domestic Wastewater Discharged per Year = 10 × 0.150 m³/day × 365 days

= 548 m³/year

This value represents the annual domestic wastewater generated by the project activity during normal operational conditions.

Net Amount of Avoided Wastewater Discharge = 6,111.17 – 548 = 5,563.17 m³ per year

- **SDG13**

Under the Design Change, emission reductions are calculated for the eligible installed capacity (46.2 MW), corresponding to an annual net electricity generation of 134,400 MWh.

The annual emission reduction estimated by the project is approximately 87,118 tCO₂/year. While this amount of emissions is mitigated, technology transfer is also realized through the deployment and expansion of wind energy technologies.

The project contributes to improving the environmental situation both regionally and nationally, as avoiding fossil fuel-based electricity enhances air quality and helps reduce adverse climate impacts. Through renewable technologies and wind-based electricity generation, sustainable and climate-friendly development is promoted.

This project is therefore expected to avoid approximately 87,118 tCO₂/year, contributing to target 13.2 and indicator 13.2.2.

For the emission factors used to calculate the estimated emission reductions, the publication of the Turkish Ministry of Energy and Natural Resources indicating Türkiye's National Electric Grid Emission Factor for the year 2019 has been applied. The publication includes calculated emission factor values for Operating Margin (OM), Build Margin (BM), and Combined Margin (CM), derived using the IPCC Clean Development Mechanism Tool 07-V.07.0.

The dataset used for this calculation includes:

- TEİAŞ electricity generation, consumption and loss statistics,
- Common Reporting Format (CRF) tables under Türkiye's National Greenhouse Gas Inventory (1.A.1.a.i electricity generation emission values),
- Chronological order of power generation plants from TEİAŞ Load Dispatch Department (commissioning dates, plant names, fuel types, installed capacities and electricity generation for the calculated year),
- Cross-checking of carbon credit ownership status via Gold Standard (GS) and Verified Carbon Standard (VCS) registries, and
- Power plant efficiency figures from CDM Tool 009-V2.0.

According to this publication, the emission factor values are:

- Operating Margin (OM): 0.7258 tCO₂/MWh
- Build Margin (BM): 0.4153 tCO₂/MWh
- Combined Margin (CM) for wind and solar: 0.6482 tCO₂/MWh

In accordance with ACM0002, the Combined Margin baseline emission of 0.6482 tCO₂/MWh has been applied in the calculation of emission reductions.

Project emissions

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

Leakage

LE_y is 0, as it is not considered according to ACM0002 (page 10) PE_y is 0 because project is a wind power generation activity (Only for geothermal and hydro project activities, it should be considered according to ACM0002 page 7).

Then: $ER_y = BE_y$

Baseline emissions

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

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

Where:

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

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

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

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

The originally registered project was a new grid-connected renewable power plant. The Design Change represents an expansion within the same project boundary; however, in accordance with ACM0002, EG_{baseline} remains zero.

Emission reductions are calculated as:

$$ER_y = BE_y = EG_y \times EF_{grid,CM,y}$$

For the originally registered configuration:

$$EG_y = 112,000 \text{ MWh/year}$$

$$EF_{grid,CM,y} = 0.6482 \text{ tCO}_2/\text{MWh}$$

$$ER_y(\text{original}) = 112,000 \times 0.6482 = 72,598 \text{ tCO}_2/\text{year}$$

Under the Design Change, emission reductions are calculated for the eligible installed capacity (46.2 MW):

$$EG_y = 134,400 \text{ MWh/year}$$

$$EF_{\text{grid,CM,y}} = 0.6482 \text{ tCO}_2/\text{MWh}$$

$$ER_y(\text{expanded}) = 134,400 \times 0.6482 = 87,118 \text{ tCO}_2/\text{year}$$

As the capacity increase is planned to be implemented from November 2026 onwards, emission reductions for the year 2026 will be calculated on a pro-rata basis as follows:

For 10 months (January–October 2026), the originally registered configuration applies:

$$= (10/12) \times 72,598$$

$$= 60,498 \text{ tCO}_2$$

For 2 months (November–December 2026), the eligible expanded configuration applies:

$$= (2/12) \times 87,118$$

$$= 14,520 \text{ tCO}_2$$

Total emission reductions for 2026:

$$= 60,498 + 14,520 = 75,018 \text{ tCO}_2$$

From 2027 onwards, emission reductions will be calculated based on the eligible installed capacity (46.2 MW), corresponding to 87,118 tCO₂ per year. The emission reduction for the full year 2027 is 87,118 tCO₂ and the emission reduction from 01/01/2028 to 26/10/2028, the end of crediting period, is 71,603 tCO₂.

Baseline scenario is identified and described in B.4. Emission reductions due to project activity will be calculated according to "Tool to calculate the emission factor for an electricity system" (Tool) version 7.0.0 as indicated in ACM0002 ver. 22.0.

A brief explanation of this methodology is given in Tool as (page 4): *This methodological tool determines the CO₂ emission factor for the displacement of*

electricity generated by power plants in an electricity system, by calculating the "combined margin" emission factor (CM) of the electricity system.

B.6.2 Data and parameters fixed ex ante

Data/parameter	EF_{grid,CM,y}
Unit	tCO ₂ /MWh
Description	For the combined margin CO ₂ emission factor that were used to calculate estimated emission reductions, publication of Turkish Ministry of Energy and Natural Resources which is indicating Türkiye's National Electric Grid Emission Factor for the year of 2019 was used.
Source of data	Please see: https://enerji.gov.tr/evced-cevre-ve-iklim-turkiye-ulusal-elektrik-sebekesi-emisyon-faktoru or https://enerji.gov.tr//Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/T%C3%BCrkiyeUlusalElektrik%C5%9EebekesiEmisyonFakt%C3%B6r%C3%BC/Belgeler/EK-2.pdf
Value(s) applied	0.6482 tCO ₂ /MWh
Choice of data or Measurement methods and procedures	The baseline emissions are the product of electrical energy baseline expressed in MWh of electricity produced by the renewable generating unit multiplied by an emission factor.
Purpose of data	To show CO ₂ e reduction in order to monitor the SDG 13 Indicator.
Additional comment	

SDG 13

Data / Parameter	EF_{grid,BM,y}
Unit	tCO ₂ /MWh

Description	For the emission BM factor, that were used to calculate estimated emission reductions, publication of Turkish Ministry of Energy and Natural Resources which is indicating Türkiye's National Electric Grid Emission Factor for the year of 2019 was used. Publication includes calculated Emission Factor values that are Operating Margin (OM), Growth Based Margin (Build Margin-BM) and Combined Margin (CM) Emission Factors, for the relevant year with usage of the IPCC's Clean Development Methodology Tool 07-V.07.0.
Source of data	Please see: https://enerji.gov.tr/evced-cevre-ve-iklim-turkiye-ulusal-elektrik-sebekesi-emisyon-faktoru or https://enerji.gov.tr/Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/T%C3%BCrkiyeUlusalElektrik%C5%9EebekesiEmisyonFakt%C3%B6r%C3%BC/Belgeler/EK-2.pdf
Value(s) applied	0,4153 tCO ₂ /MWh
Choice of data or Measurement methods and procedures	Ministry of Energy and Natural Resources makes available the official data in Türkiye. The latest data available during PDD preparation was for 2019.
Purpose of data	Used for baseline emissions
Additional comment	

Data / Parameter	EF_{grid,OM,y}
Unit	tCO ₂ /MWh
Description	For the emission OM factor, that were used to calculate estimated emission reductions, publication of Turkish Ministry of Energy and Natural Resources which is indicating Türkiye's National Electric Grid Emission Factor for the year of 2019 was used. Publication includes calculated Emission Factor values that are Operating Margin (OM), Growth Based Margin (Build Margin-BM) and Combined Margin (CM) Emission Factors, for the relevant year with usage of the IPCC's Clean Development Methodology Tool 07-V.07.0.

Source of data	Please see: https://enerji.gov.tr/evced-cevre-ve-iklim-turkiye-ulusal-elektrik-sebekesi-emisyon-faktoru or https://enerji.gov.tr/Media/Dizin/EVCED/tr/%C3%87evreVe%C4%B0klim/%C4%B0klimDe%C4%9Fi%C5%9Fikli%C4%9Fi/T%C3%BCrkiyeUlusalElektrik%C5%9EebekesiEmisyonFakt%C3%B6r%C3%BC/Belgeler/EK-2.pdf
Value(s) applied	0,7258 tCO ₂ /MWh
Choice of data or Measurement methods and procedures	Ministry of Energy and Natural Resources makes available the official data in Türkiye. The latest data available during PDD preparation for 2 nd crediting period was for 2018.
Purpose of data	Used for baseline emissions
Additional comment	

B.6.3 Ex ante estimation of SDG Impact

Calculation of the Operating Margin Emission Factor

For OM factor calculation, Chronological order of power generation plants from TEİAŞ Load Dispatch Department with, fuel types, electricity generation for the calculated year were used as input data. By using all of the data which were mentioned above, Turkish Ministry of Energy and Natural Resources calculated $EF_{grid,OMsimple,y}$:



$$EF_{grid,OMsimple,y} = 0.7258 \text{ (ktCO}_2\text{/GWh)}$$

Calculation of the Build Margin Emission Factor

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

$$EF_{grid,BM,y} = 0.4153 \text{ tCO}_2\text{/MWh}$$

Calculation of the Combined Margin Emission Factor

The combined margin emission factor is calculated using the weighted average formula as defined in the “Tool to calculate the emission factor for an electricity system”:

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

where

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

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

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

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

According to the Tool for wind power generation project activities;

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

Therefore:

$$EF_{grid,CM,y} = (0.7258 \text{ tCO}_2/\text{MWh} * 0.75) + (0.4153 \text{ tCO}_2/\text{MWh} * 0.25) \\ = 0.6482 \text{ tCO}_2/\text{MWh}$$

$$EF_{grid,CM,y} = 0.6482 \text{ tCO}_2/\text{MWh}$$

Emission reductions

Emission reductions are calculated as follows:

$$ER_y = BE_y - PE_y - LE_y$$

Where:

- ER_y = Emission reductions in year y (tCO₂/year)
- BE_y = Baseline emissions in year y (tCO₂/year)
- PE_y = Project emissions in year y (tCO₂/year)
- LE_y = Leakage emissions in year y (tCO₂/year)

Baseline emissions

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

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

Where:

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

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

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

$EF_{grid,CM,y}$ = Combined margin CO₂ emission factor for grid connected power generation in year y (tCO₂/MWh).

The originally registered project was a new grid-connected renewable power plant. Under the Design Change, the capacity expansion remains within the same project boundary and does not constitute a retrofit of an existing fossil fuel-based facility. Therefore, in accordance with ACM0002, $EG_{baseline}$ remains zero.

Project Emissions and Leakage

Project emissions (PE_y) are zero, as electricity generation from wind does not result in direct greenhouse gas emissions.

Leakage emissions (LE_y) are zero, as they are not considered for wind power generation activities under ACM0002.

Therefore:

$$ER_y = BE_y$$

Ex-ante Emission Reduction Estimation (Eligible Capacity)

Under the Design Change, emission reductions are calculated for the eligible installed capacity of 46.2 MW, corresponding to an annual net electricity generation of: $EG_y = 134,400$ MWh/year.

Accordingly:

$$ER_y = BE_y = EG_y \times EF_{grid,CM} = 134,400 \text{ MWh/year} \times 0.6482 \text{ tCO}_2/\text{MWh} = 87,118 \text{ tCO}_2/\text{year}$$

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

SDG 13 Climate Action

YEAR	BASELINE ESTIMATE	PROJECT ESTIMATE	NET BENEFIT
27.10.2021-31.12.2021	13,127	0	13,127
2022	72,598	0	72,598
2023	72,598	0	72,598
2024	72,598	0	72,598
2025	72,598	0	72,598
2026	75,018	0	75,018
2027	87,118	0	87,118
01.01.2028-26.10.2028	71,603	0	71,603
Total	537,258	0	537,258
Total number of crediting years		7	
Annual average over the crediting period	76,751		76,751

SDG 6 Clean Water and Sanitation:

The project activity replaces grid electricity, which is generated from various fuel sources that cause greenhouse gas emissions and require significant water use, particularly in thermal power plants. By displacing fossil fuel-based electricity generation, the project contributes to water conservation and reduces wastewater discharged into the environment.

Under the Design Change, SDG impacts are calculated based on the eligible installed capacity (46.2 MW), corresponding to an annual net electricity generation of 134,400 MWh (134.4 GWh).

In the absence of the project activity, electricity would be generated by grid-connected power plants, including thermal power plants that discharge significant volumes of wastewater. The baseline value for wastewater discharge associated with fossil fuel-based electricity generation is calculated as follows:

$$\frac{\text{Average Amount of WasteWater Discharged per each GWh Electricity Generation}}{\text{Total WasteWater Discharged by Thermal Power Plants in 2024}^9} = \frac{\text{Total Electricity Generation by Thermal Power Plants in 2024}^{10}}{\text{Total WasteWater Discharged by Thermal Power Plants in 2024}^9}$$

$$45.47 \text{ m}^3/\text{GWh} = 8,649,017 \text{ m}^3/190,231.01 \text{ GWh}$$

According to the calculation, 45.47 m³ of wastewater is discharged per GWh of electricity generated.

Amount of Avoided Cooling Wastewater Discharge

$$\frac{\text{Amount of Avoided Cooling Wastewater Discharge by Project Activity per year}}{\text{Annual Electricity Generation of Project Activity within the MP}} \times \text{Average Amount of Wastewater Discharged per each GWh Electricity Generation}$$

$$= 134.4 \text{ GWh} \times 45.47 \text{ m}^3/\text{GWh}$$

$$= 6,111.17 \text{ m}^3 \text{ per year}$$

Domestic Wastewater Discharge

In addition to avoided cooling wastewater discharge from thermal power plants, the project activity generates domestic wastewater during operation.

$$\frac{\text{Amount of Wastewater Discharged by Project Activity per year}}{\text{Number of employees}} \times \text{Daily water usage per worker} \times 365$$

Daily wastewater discharge per person is estimated as 0.150 m³/day according to TURKSTAT.

Assuming the project employs at least 10 personnel:

$$= 10 \times 0.150 \times 365$$

$$= 548 \text{ m}^3/\text{year}$$

Net Amount of Avoided Wastewater Discharge

Net Amount of Avoided Wastewater Discharge

⁹ <https://veriportali.tuik.gov.tr/tr/press/54109>

¹⁰ <https://www.teias.gov.tr/turkiye-elektrik-uretim-iletim-istatistikleri>

$$= 6,111.17 - 548$$

$$= 5,563.17 \text{ m}^3 \text{ per year}$$

The project is therefore expected to avoid approximately 5,563.17 m³ of net wastewater discharge per year, contributing to SDG Target 6.3 and Indicator 6.3.1.

SDG 7 Affordable and Clean Energy

The baseline scenario for the project is the continuation of electricity generation within the Turkish national grid, which includes a significant share of fossil fuel-based power plants. In the absence of the project activity, the equivalent electricity demand would be met by grid-connected power plants, including thermal generation sources.

Under the Design Change, emission reductions and SDG impacts are calculated for the eligible installed capacity of 46.2 MW, corresponding to an annual net electricity generation of 134,400 MWh.

For the year 2026, electricity generation is calculated on a prorated basis reflecting implementation of the capacity increase from November 2026 onwards. For the year 2028, generation is calculated proportionally for 300 operating days within the crediting period.

Accordingly, the clean energy generated by the project is calculated based on the annual electricity supplied to the grid under the eligible capacity configuration.

YEAR	BASELINE ESTIMATE	PROJECT ESTIMATE	NET BENEFIT
27.10.2021-31.12.2021	0	20,252	20,252
2022	0	112,000	112,000
2023	0	112,000	112,000
2024	0	112,000	112,000
2025	0	112,000	112,000
2026	0	115,733	115,733
2027	0	134,400	134,400
01.01.2028-26.10.2028	0	110,465	110,465
Total	0	828,850	828,850

Total number of crediting years		7	
Annual average over the crediting period	0	118,407	118,407

Balance of payments and investment:

The project is expected to generate 134,400 MWh of clean energy per annum under the eligible installed capacity following the Design Change. For the year 2026, electricity generation is calculated on a prorated basis reflecting implementation of the capacity increase from November 2026 onwards. For the year 2028, generation is calculated proportionally for 300 operating days.

The project is expected to avoid approximately 1,864,788 EUR of natural gas imports annually based on the eligible electricity generation.

SDG 8 Decent Work and Economic Growth

The project activity generates employment opportunities that would not have occurred under the baseline scenario. During the operational phase, Şadılı WPP employs between 5 and 15 personnel, contributing to local employment and regional economic activity.

Under the Design Change, the continued operation and expanded capacity of the wind power plant sustain and reinforce these employment opportunities. The capacity increase does not reduce workforce requirements; rather, it supports long-term operational stability and job continuity.

In addition, the project enhances the quality of employment by providing regular training to employees. Training programmes are organised periodically with a focus on occupational health and safety, technical operation, and environmental management within Şadılı WPP.

Through stable employment and structured training programmes, the project contributes to SDG Target 8.8 and Indicator 8.8.2.

B.7. Monitoring plan

B.7.1 Data and parameters to be monitored

SDG 13 Climate Action

Target: 13.3

Indicator: 13.3.1

Data / Parameter	ER_y
Unit	tons of CO ₂ e/year
Description	Emission reductions in year y, calculated as the net electricity supplied to the grid by the project activity multiplied by the Combined Margin (CM) emission factor of the Turkish electricity system, in accordance with ACM0002.
Source of data	Net electricity generation is obtained from official EPIAŞ settlement notifications based on monthly meter readings. The Combined Margin emission factor (0.6482 tCO ₂ /MWh) is calculated and published by the Ministry of Energy and Natural Resources of Türkiye in accordance with the "Tool to calculate the emission factor for an electricity system".
Value(s) applied	87,118
Measurement methods and procedures	Amount of annual net electricity generation, which is calculated by monthly settlement notifications of TEİAŞ based on monthly meter readings, will be used to calculate estimated CO ₂ emission reduction by project activity.
Monitoring frequency	Annually
QA/QC procedures	-
Purpose of data	Calculation of combined margin CO ₂ emission factor and thus the baseline emissions-to demonstrate contribution to SDG Target 13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning
Additional comment	-

SDG 7 Affordable and Clean Energy

Target:7.2

Indicator: 7.2.1

Data / Parameter	$EG_{\text{facility},y}$
Unit	MWh/yr
Description	Quantity of net electricity generation supplied by the project plant to the grid in year y

Source of data	Electricity meter(s)
Value(s) applied	134,400
Measurement methods and procedures	Regarding the electricity meters: two meters are placed (one main and one reserve) at the Şadıllı WPP which meters the electricity transferred to TEİAŞ substation. These meters are sealed by TEİAŞ and intervention by project proponent is not possible. The fact that two meters are installed in a redundant manner keeps the uncertainty level of the only parameter for baseline calculation low. High data quality of this parameter is not only in the interest of the emission reduction monitoring, but paramount for the business relation between the plant operator and the electricity buyers. Measured hourly and readings monthly. Monthly settlement notifications of EPIAŞ consist hourly electricity production and withdrawn from the grid. Since the meters are reading electricity supplied to the system and withdrawn from the system separately, the net electricity amount supplied to the grid is calculated by electricity supplied minus electricity withdrawn which is taken from monthly settlement notifications. The above described measurement method is implemented in accordance with the provisions of the Turkish Electricity Market Balancing and Settlement Regulation and the settlement procedures applied by EPIAŞ and TEİAŞ. Net electricity supplied to the grid is determined based on electricity supplied to and withdrawn from the system as recorded by the revenue-grade meters and reflected in the monthly settlement notifications¹¹.
Monitoring frequency	Monthly

¹¹ https://www.epias.com.tr/wp-content/uploads/2026/02/Electricity-Market-Balancing-and-Settlement-Regulation-29.12.2025.pdf?utm_source=chatgpt.com

QA/QC procedures

The electricity meters used for revenue metering comply with the applicable requirements of the Turkish electricity market legislation and relevant IEC standards. Both the main and backup meters have an accuracy class of 0.5S and are installed, sealed and operated under the supervision of the competent authorities and system operators. The use of main and backup meters ensures data reliability and allows cross-checking of the monitored electricity generation data.

The main and backup electricity meters are subject to periodic inspection, testing and calibration requirements in accordance with the applicable Turkish metering legislation and the requirements of the relevant authorities. Calibration and verification records are maintained by the project owner and made available during verification.

On 03.10.2019, both main and backup meters have been changed as their official seals were expired. After 03.10.2019 different meters are being used. The specification of current electricity meters are provided below:

Current Main Electricity Meter with accuracy class of 0.5 S. Manufacturer: EMH

Brand-Model: LZQJ-XC

Serial Number: 8088831

Date of installation 03/10/2019

Date of calibration (First Index Procokol)³⁷ :
03/10/2019

Validity of calibration: 03/10/2029

Year of Manufacture: 2018

Current Back-up Electricity Meter with accuracy class of 0.5 S. Manufacturer: EMH

Brand-Model: LZQJ-XC

Serial Number:

8088832

Date of installation: 03/10/2019

Validity of calibration: 03/10/2029

Date of calibration (First Index Protocol)³⁸ :
03/10/2019 Year of Manufacture: 2018

As above mentioned, the data acquisition and management and quality

	assurance procedures that are anyway in place, no additional procedures have to be established for the monitoring plan.
Purpose of data	To exhibit renewable electricity generation performance the plant
Additional comment	Plant Manager will be responsible for monitoring data.

SDG 7

Data / Parameter	Balance of payments and investment
Unit	m ³ natural gas avoided per year / EUR per year
Description	Savings on natural gas imports due to renewable electricity generation
Source of data	TEİAŞ electricity generation statistics (2024) for natural gas consumption and generation; Monthly net electricity generation based on EPIAŞ settlement notifications
Value(s) applied	Avoidance of approximately 5,528,573 m ³ natural gas imports per year, corresponding to the eligible installed capacity under the Design Change (134.4 GWh/year). This corresponds to an estimated economic value of approximately 1,864,788 EUR per year.
Choice of data or Measurement methods and procedures	According to TEİAŞ data, 14,326,244 thousand m ³ natural gas was consumed for electricity generation in 2024. In the same year, electricity generation from natural gas amounted to 66,978 GWh. Since Türkiye imported 98.12% of consumed natural gas in 2024, it is calculated that for 1 GWh of gas-fired electricity generation, 209,873.55 m ³ natural gas is imported (Source: TEİAŞ Türkiye Elektrik Üretim-İletim İstatistikleri, https://www.teias.gov.tr/turkiye-elektrik-uretim-iletim-istatistikleri). This conversion factor represents the gas-import intensity of gas-fired generation specifically, and is not applied to the project's total generation without adjustment. Natural gas accounted for 19.6% of Türkiye's total electricity generation in 2024 (66,978 GWh gas-fired generation ÷ 341,848.06 GWh total national generation; TEİAŞ Türkiye Elektrik Üretim-İletim İstatistikleri, https://www.teias.gov.tr/turkiye-elektrik-uretim-iletim-istatistikleri). This share is applied as a conservative proxy for the portion of the project's displaced generation

	attributable to gas-fired plants, consistent with the fact that gas does not represent the entirety of the national generation mix. The annual avoided natural gas volume is therefore calculated by multiplying the eligible net electricity generation (MWh/year) by this fixed conversion factor and by the 19.6% gas-share factor. Net annual electricity generation is determined based on monthly settlement notifications of EPIAŞ derived from monthly meter readings.
Purpose of data	To quantify avoided natural gas imports and associated economic savings, contributing to SDG Target 7.2 (increase renewable energy share).
Additional comment	

SDG 7 Affordable and Clean Energy

Target:7.2

Indicator: 7.2.1

Data / Parameter	Balance of payments and investment
Unit	-
Description	Savings on natural gas imports
Source of data	Monthly meter readings
Value(s) applied	Avoidance of around 5,528,573 m ³ natural gas import each year by generation of project activity, which is worth about 1,864,788 EUR per year.
Measurement methods and procedures	TEİAŞ statistics for natural gas share in the electricity mix shall help to demonstrate the high import dependency. Amount of annual net electricity generation, which is calculated by monthly settlement notifications of EPIAŞ based on monthly meter readings, will be used to calculate correspondent amount of currency saved by project activity with help of above calculated factor.
Monitoring frequency	Annually
QA/QC procedures	-
Purpose of data	Ensure access to affordable, reliable, sustainable and modern energy.
Additional comment	-

SDG 6

Data / Parameter	Average amount of wastewater discharged
Unit	m³ /GWh
Description	Average amount of wastewater discharged per GWh
Source of data	Turkish Electricity Transmission Company (TEİAŞ), Annual Development of Türkiye's Gross Electricity Generation of Primary Energy Resources (2024) Turkish Statistical Institute (TURKSTAT), Wastewater Discharged by Thermal Power Plants (2024)
Value(s) applied	45.47 m ³ /GWh
Choice of data or Measurement methods and procedures	Coefficient for wastewater avoidance from potential cooling water operations calculated by taking Total Waste Water Discharged by Thermal Power Plants in the related year (publication of TURKSTAT data for the year of 2024, which is the most recent available data, was used) and Net Electricity Generation in the related year (publication of TEİAŞ data for the year of 2024 was used) TEIAS is the national electricity transmission company, which makes available the official data of all power plants in Türkiye. TURKSTAT compile, evaluate, analyses and publish official statistics in the fields of economy, social issues, demography, culture, environment, science and technology, and in the other required areas in Türkiye.
Purpose of data	Avoidance wastewater discharge to the environment
Additional comment	-

SDG 8 Decent Work and Economic Growth

Target: 8.8

Indicator: 8.8.2

Data / Parameter	Quantitative employment and income generation
Unit	-
Description	Number of employments
Source of data	Social security records
Value(s) applied	The project provides between 5 and 15 employments
Measurement methods and procedures	Social Security System (SGK) records. Project owner will employ workers from the local villages in the Şadıllı WPP.
Monitoring frequency	Each monitoring period.
QA/QC procedures	SGK records of employees are provided during each monitoring period
Purpose of data	Employment and decent work for all
Additional comment	-

Data / Parameter	Quality of employment
Unit	-
Description	Quality of employment
Source of data	Health & Safety trainings
Value(s) applied	All employees will attend trainings on Health and Safety. HSE trainings will be held for employees at the plant.
Measurement methods and procedures	Training attendance list and/or certificates
Monitoring frequency	Annually (Once at the end of the each monitoring period). After first verification period, only new cases will be reported.
QA/QC procedures	Attendance records or training certificates are provided during each monitoring period.
Purpose of data	To exhibit employment performance of the plant
Additional comment	

SDG 6 Clean Water and Sanitation

Target: 6.3

Indicator: 6.3.1

Data / Parameter	Water Quality and Quantity
Unit	m ³ /year
Description	Net amount of wastewater discharge avoided per year
Source of data	TURKSTAT (Wastewater Discharged by Thermal Power Plants, 2024) and TEİAŞ electricity generation statistics (2024)
Value(s) applied	Avoidance of around 6,111.17 m ³ wastewater discharge to the environment per year.
Measurement methods and	Coefficient for wastewater avoidance from potential cooling water operations calculated by taking Total Wastewater

procedures	Discharged by Thermal Power Plants in the related year and Net Electricity Generation in the related year.
Monitoring frequency	Annually
QA/QC procedures	
Purpose of data	Avoidance wastewater discharge to the environment
Additional comment	-

Principle 9.4 – Release of Pollutants

Data / Parameter	Other pollutants
Unit	N/A
Description	a) Noise level during operation of the project activity. b) Waste oil amount c) Solid household waste
Source of data	a) Interview with the head of village b) Removal receipts c) Garbage bins' photos
Value(s) applied	N/A
Measurement methods and procedures	a) The noise level from turbines will be interviewed to the head of village b) Receipts of transfer of waste oil will be checked c) Garbage bins' photos will be checked
Monitoring frequency	a) At least once for each monitoring period b) At least once for each monitoring period c) At least once for each monitoring period
QA/QC procedures	-
Purpose of data	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss.
Additional comment	-

Principle 9.10 - High Conservation Value Areas and Critical Habitats

Data / Parameter	Biodiversity
Unit	N/A
Description	Impact of the project activity on birds and bats
Source of data	Plant personnel records, carcass monitoring reports and site observations.

Value(s) applied	N/A
Measurement methods and procedures	Project personnel routinely observe the project site during operation and maintenance activities and record any bird or bat collision incidents reported around the wind turbines. In addition, periodic carcass monitoring surveys are conducted by qualified experts to assess bird and bat mortality associated with the project activity. The results of these surveys are reviewed together with site observation records to evaluate potential biodiversity impacts. The latest carcass monitoring study conducted in 2025 confirmed that no bird or bat carcasses were detected within the monitoring area.
Monitoring frequency	Once in a monitoring period
QA/QC procedures	-
Purpose of data	Determining the impact of the project activity on bird and bat mortality.
Additional comment	-

Principle 4 - Cultural Heritage, Indigenous Peoples, Displacement and Resettlement

Data / Parameter	Livelihood of the Poor
Unit	N/A
Description	Livestock feeding
Source of data	Interview with stakeholders
Value(s) applied	N/A
Measurement methods and procedures	No access limitation at the project site for livestock.
Monitoring frequency	Only once during the first verification for second crediting period
QA/QC procedures	-
Purpose of data	Livestock feeding
Additional comment	-

Data / Parameter	Livelihood of the Poor
Unit	N/A
Description	Land acquisition

Source of data	Interview with stakeholders
Value(s) applied	N/A
Measurement methods and procedures	Interviews to check whether the process is carried out properly according to legal requirements and that land owners are compensated fairly.
Monitoring frequency	Only once during the first verification for second crediting period
QA/QC procedures	-
Purpose of data	Land acquisition
Additional comment	-

Principle 9.1 Landscape Modification and Soil

Data / Parameter	Other
Unit	N/A
Description	Erosion risk control at new roads
Source of data	Observation
Value(s) applied	N/A
Measurement methods and procedures	Visual inspection whether the roads have caused significant erosion. Interview with Şadıllı WPP personnel. The erosion at the newly constructed roads will be minimised by limiting the slope and the curvature of the roads and by ensuring high road strength and stability.
Monitoring frequency	Only once during the first verification for second crediting period
QA/QC procedures	-
Purpose of data	Soil Condition
Additional comment	-

Principle 9.2 - Vulnerability to Natural Disaster

Data / Parameter	Other
Unit	N/A
Description	Earthquake risk
Source of data	EIA study
Value(s) applied	N/A
Measurement methods and procedures	Earthquake insurance is taken out for the project.

Monitoring frequency	Only once during the first verification for second crediting period
QA/QC procedures	In the HSE (occupational health and safety) trainings, all employees are informed related to the earthquake.
Purpose of data	Soil Condition
Additional comment	-

B.7.2 Sampling plan

N/A

B.7.3 Other elements of monitoring plan

As the necessary baseline emission factors are defined ex-ante (Operating Margin and Built Margin, see baseline description), the most important parameter to be monitored is the net amount of electricity fed into the grid by Şadılı WPP. This value will be monitored continuously by redundant metering devices, one of them being the main meter located at the substation, which provides the data for the monthly invoicing to TEİAŞ.

The collected data will be retained by Şadılı throughout the crediting period and for at least two years after the last issuance of GS VERs for the respective crediting period. The monitoring approach applies to the entire project activity; the primary monitored parameter (net electricity supplied to the grid) remains unchanged following the design change and continues to be measured through the existing metering infrastructure. To attribute this measured generation to the Gold Standard-eligible capacity, the following conservative allocation approach is applied: the eligible share of net electricity generation is calculated by multiplying total metered generation by the ratio of eligible installed capacity to total installed capacity following the design change ($46.2 \text{ MW} / 74.5 \text{ MW} = 62.01\%$). In accordance with the Gold Standard capacity increase limitation, the resulting eligible generation may in no case exceed the annual generation cap of 134,400 MWh ($1.2 \times$ the originally registered generation of 112,000 MWh); where the ratio-based calculation would exceed this cap, the cap is applied instead.

Given the selection of a renewable 7-year crediting period, the Combined Margin emission factor is recalculated at each renewal of the crediting period using the applicable version of the baseline methodology.

In the case that a backup power generator is installed for emergency situations, emissions from such generator are expected to be negligible in accordance with ACM0002 version 22.0.

Potential leakage emissions in power sector projects may arise from activities such as plant construction, fuel handling or land inundation. However, in accordance with the methodology, these sources are not required to be accounted for.

Operational and Management Structure

Data handling has been updated to reflect technological improvements that enable TEİAŞ to read meters remotely. Under this system, meters are read remotely at the end of each month and the data are published on the TEİAŞ website, which can be accessed by the Project Developer for verification.

In addition, the project owner conducts a monthly cross-check of the data. Once the meter data are verified, the electricity generation amount is also published on the EPIAŞ website. After verification of all data, an invoice is prepared by Çanres Elektrik and submitted to TEİAŞ.

Electricity generation data and related records are stored both in hard copy and electronically on a daily and monthly basis. These records are retained for the entire crediting period and for at least two years after the last issuance of GS VERs.

Since baseline emission factors are defined ex ante, the only monitored parameter relevant for emission reduction calculations is the net electricity supplied to the grid. The data used as the basis for invoicing and published on the EPIAŞ platform are used as inputs for emission reduction calculations.

Two calibrated best-practice meters are installed in a redundant configuration, which ensures a low level of uncertainty in the monitored parameter.

The reliability of the data is essential not only for emission reduction monitoring but also for commercial settlement between the plant operator and the electricity purchaser. As electricity supplied to and withdrawn from the grid are measured separately, the net electricity supplied to the grid is calculated as electricity supplied minus electricity withdrawn, based on monthly settlement notifications.

Monthly data from TEİAŞ are stored electronically and can be accessed through the Project Developer's login credentials. Çanres Elektrik also retains hard copies of the monthly meter reading protocols for backup purposes.

Internal reviews of the meter data are conducted regularly. Meter readings are collected daily by technicians and stored electronically. In addition, electricity production can be cross-checked through the SCADA system. Minor differences between SCADA data and meter readings may occur due to internal losses.

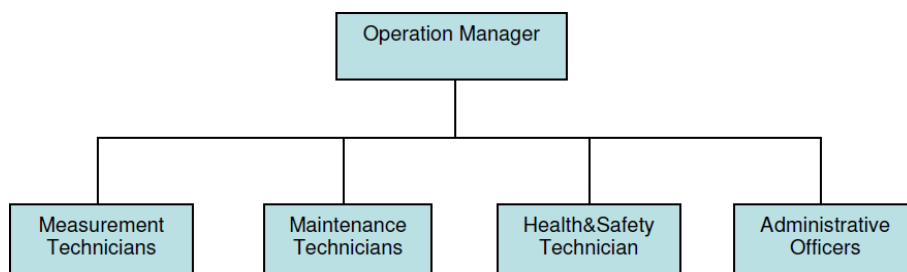


Figure 5: Operation and Management diagram

Çanres Elektrik retains all data required for emission reduction calculations during the crediting period and for at least two years after the last issuance of GS VERs for Şadıllı WPP.

Due to the existing data acquisition, management and quality assurance procedures, no additional monitoring procedures are required following the design change. No dedicated emergency procedures are required, as there is no risk of overestimation of emission reductions due to emergency situations.

SECTION C. DURATION AND CREDITING PERIOD

C.1. Duration of project

C.1.1 Start date of project

The registered project activity commenced on 28/02/2012, corresponding to the date on which the equipment order was signed between Şadıllı and GE Energy.

C.1.2. Expected operational lifetime of project

The expected lifetime of the Şadıllı WPP is 25 years.

C.2. Crediting period of project

C.2.1. Start date of crediting period

Start date of the first crediting period: 27/10/2014

End date of the first crediting period: 26/10/2021

(Crediting period of the project is 7 years which is twice renewable)

Start date of the second crediting period: 27/10/2021

End date of the second crediting period: 26/10/2028

C.2.2. Total length of crediting period

7 years, renewed twice.

SECTION D. SUMMARY OF SAFEGUARDING PRINCIPLES AND GENDER SENSITIVE ASSESSMENT

D.1 Safeguarding Principles that will be monitored

A completed Safeguarding Principles Assessment is in [Appendix 1](#), ongoing monitoring is summarised below.

PRINCIPLES	MITIGATION MEASURES ADDED TO THE MONITORING PLAN
Principle 9.4 Release of pollutants	Noise level will be interviewed by head of village regularly.
Principle 9.4 Release of pollutants	Waste oil will be vacuumed by vacuum truck regularly. By this way, discharge of plant sourced waste oil will not be allowed. Solid household waste will be monitored with garbage bins' photos.
Principle 4 – Cultural Heritage, Indigenous Peoples, Displacement and Resettlement	Comments will be received from local people both on the project activity and on the livestock feeding regularly. Local stakeholder comments will be received to monitor the land acquisition.
Principle 9.10 - High Conservation Value Areas and Critical Habitats	Bird strikes or carcass will be interviewed by local people and assigned Şadıllı WPP personnel.
Principle 9.1 - Landscape Modification and Soil	Erosion risk will be interviewed by Şadıllı WPP personnel.
Principle 9.2 - Vulnerability to Natural Disaster	All construction codes are maintained and necessary construction permits are obtained. Earthquake insurance is taken out for the project. In the HSE (occupational health and safety) trainings, all employees are informed related to the earthquake.

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

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

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

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

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

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

Question 3 - Is an Expert required for the Gender Safeguarding Principles & Requirements?	No. The project does not involve and is not complicit in any form of discrimination based on gender, race, religion, sexual orientation or any other basis.
Question 4 - Is an Expert required to assist with Gender issues at the Stakeholder Consultation?	No. At the Stakeholder Consultation, women are free to say anything regarding the project. Their opinions and comments are also taken into account while evaluating the project at the Stakeholder Consultation

SECTION E. SUMMARY OF LOCAL STAKEHOLDER CONSULTATION

Below is a summary of the two step GS4GG Consultation for monitoring purposes.

Please refer to the separate Stakeholder Consultation Report for a complete report on the consultation and stakeholder feedback round.

E.1 Summary of stakeholder mitigation measures

The Local Stakeholder Consultation meeting following the procedures and guidance of Gold Standard v.2.1 Toolkit has been organized in the Village Chamber of the Elmalı Village (closest village to the Project site) on 09/03/2026. Identified stakeholders are invited through different ways of communication such as post, e-mail or fax. They are also (mostly) contacted via phone to inform or confirm the delivery of the invitations. Apart from these, other media such as newspapers and wall announcements are also used for public announcement.

The Project does not result in any involuntary resettlement in the region. Feedbacks the Project owner informally receives from local communities suggest that the stakeholders are in general supportive for the Project and are mostly interested in employment opportunities the Project might create.

As for the LSC meeting, the outcomes of the meeting can be summarized as following:

- The meeting was carried out such that participants could freely suggest their own ideas about the Project. The meeting is conducted with a satisfactory

organization and the free-speech atmosphere of the meeting was not disturbed by any participant.

- Stakeholders are already knowledgeable in the wind power technology. In general, participants believe that the Project will have a contributing role. After the consultation process, there is no outstanding issue left and the stakeholders are satisfied with the answers they received and the Project itself. In general, local participants are positive and supportive for the Project.

The comments of stakeholders are positive and do not require the Project owner to take due account.

Local villagers have asked if they had any problems or complaints about the impacts of the project (recent situation of the land etc.). There has been no negative feedback from the stakeholders on these issues or any other issues. So, it is validated that there were no negative comments regarding capacity increase from the stakeholders. The local people have been interviewed and the general outcome of the interviews was already positive.

Stakeholders and PP have an ongoing communication which is positive and easy.

Logbook and contact information is available to Mukhtars of nearby villages, declarations by Mukhtars available to VVB. Although the general outcome of the discussions with the local people is positive verbally, the project owner will regularly follow up with the local people whether they have any problems or requests.

Continuous Input Process Book (Logbook) which was provided to Muhtar of Elmalı village. What's more, thanks to the Grievance Mechanism, local stakeholders will have a chance to submit their requests and complaints to the project owner about the project.

Following the physical meeting held on 09/03/2026, a feedback period was kept open for stakeholders to submit any additional comments, questions or concerns regarding the capacity increase. No additional feedback was received during this period beyond the comments and discussion already captured during the meeting. Full details of the consultation process, including the list of participants and the assessment of comments received, are documented in the Stakeholder Consultation Report prepared for this Design Change.

E.2 Final continuous input / grievance mechanism

METHOD	INCLUDE ALL DETAILS OF CHOSEN METHOD (S) SO THAT THEY MAY BE UNDERSTOOD AND, WHERE RELEVANT, USED BY READERS.
Continuous Input / Grievance Expression Process Book (mandatory)	- Continuous Input Process Book was provided to Muhtar of Elmalı village. Muhtar is the representative of the village and most appropriate person to handle the book and complaints from the village. - All project information regarding project will be on the website of Life Enerji enabling stakeholders to reach and comment.
GS Contact (mandatory)	help@goldstandard.org
Muhtar of Elmalı Village	Mehmet Çoban

APPENDIX 1 - SAFEGUARDING PRINCIPLES ASSESSMENT

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

SOCIAL SAFEGUARDING PRINCIPLES		
Reference requirement	Question	Response
P.1 Human Rights		
P.1.1.1 	Does the project developer, its representatives and the Project disrespect internationally proclaimed human rights?	☐ YES ☒ NO
P.1.1.1 	Is the project involved or complicit in violence or human rights abuses of any kind as defined in the Universal Declaration of Human Rights?	☐ YES ☒ NO

P.1.1.2 	Have local communities or individuals raised human rights concerns regarding the project (e.g., during the stakeholder engagement process, grievance processes, public statements)?	☐ YES ☒ NO
P.1.1.3 	Is there a risk that rights-holders (e.g., Project-affected stakeholders) do not have the capacity to claim their rights?	☐ YES ☒ NO
P.1.1.3 	Does this project undermine national or regional measures for the realisation of the right to development?	☐ YES ☒ NO

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

Please add text here...

Would the project potentially involve or lead to:

P.1.1.1 	adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of the affected population and particularly of marginalised groups?	☐ YES ☐ POTENTIALLY ☒ NO
P.1.1.2 	inequitable or discriminatory impacts on affected populations, particularly people living in poverty or marginalised or excluded individuals or groups, including persons with disabilities?	☐ YES ☐ POTENTIALLY ☒ NO
P.1.1.3 	restrictions in availability, quality of and/or access to resources or basic services, in particular to marginalised individuals or groups, including persons with disabilities?	☐ YES ☐ POTENTIALLY ☒ NO
P.1.1.3 	exacerbation of conflicts among and/or the risk of violence to project-affected communities and individuals?	☐ YES ☐ POTENTIALLY ☒ NO

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

For example, by describing how the project design:

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

Please add text here....

P.2 | GENDER EQUALITY AND WOMEN'S EMPOWERMENT

P.2.1.1 	Have women's groups/leaders raised gender equality concerns regarding the project, (e.g., during the	☐ YES ☒ NO
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	stakeholder engagement process, grievance processes, public statements)?	
P.2.1.2 	Does the project undermine the principles of non-discrimination, equal treatment, and equal pay for equal work?	☐ YES ☒ NO
P.2.1.2 	Does the project prevent men and women from having equal opportunities to participate in identified tasks and activities, whether through paid work, volunteer work, or community contributions, as appropriate?	☐ YES ☒ NO
P.2.1.2 	Does the project limit the participation of women or men based on pregnancy, maternity/paternity leave, or marital status?	☐ YES ☒ NO
P.2.1.2 	Is information about project objectives being communicated in a way that is inappropriate for the local context and not tailored to the methods of understanding of both women and men, which could hinder their participation?	☐ YES ☒ NO
P.2.1.3 	Has the project assessed gender risks without referencing the country's gender strategy or equivalent national commitment?	☐ YES ☒ NO
P.2.1.4 	Has expert stakeholder(s) been involved, and has their input been requested for the project design on gender equality and women's empowerment?	☐ YES ☒ NO

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

Please add text here....

Would the project potentially involve or lead to:

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

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

Please add text here....

P.3 | COMMUNITY HEALTH AND SAFETY

P.3.1.1 	Does the project involve potential risks to the health and safety of affected communities during its life cycle?	☐ YES ☒ NO
P.3.1.2 	Does the project involve any potential risks to the workers' safety and health?	☐ YES ☒ NO

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

Please add text here....

Would the project potentially involve or lead to:

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

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

Please add text here....

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

P.4.1 | Sites of Cultural and Historical Heritage

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

Please add text here....

Would the project potentially involve or lead to:

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

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

Please add text here....

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

P.4.2.1 	Does the project involve any risks related to involuntary relocation of people?	☐ YES ☒ NO
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If the answer to question above is "yes," please explain the reason and how the project will ensure compliance with applicable requirements.

Please add text here....

Would the project potentially involve or lead to:

P.4.2.1 	risk of forced evictions or involuntary relocation of people?	☐ YES ☐ POTENTIALLY ☒ NO
P.4.2.2 	temporary or permanent and full or partial physical displacement (including people without legally recognisable claims to land)?	☐ YES ☐ POTENTIALLY ☒ NO
P.4.2.2 	economic displacement (e.g., loss of assets or access to resources due to land acquisition or access restrictions – even in the absence of physical relocation)?	☐ YES ☐ POTENTIALLY ☒ NO
P.4.2.2 	If answer to question above is "YES" or "POTENTIALLY", - has the project developed Resettlement Action Plan or Livelihood Action Plan in consultation and agreement with affected individual, group or community? - has the project integrated Resettlement Action Plan or Livelihood Action Plan into the Project design?	☐ YES ☐ NO ☒ NA
P.4.2.3 	If answer to question above is "YES" - are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	☐ YES ☐ NO ☒ NA
P.4.2.3 	If answer to question above is "YES", have project design been changed, modified, updated considering opinions and recommendations of an Expert Stakeholder?	☐ YES ☐ NO ☒ NA

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

Please add text here....

[P.4.3 | LAND TENURE AND OTHER RIGHTS](#)

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

Please add text here....

Would the project potentially involve or lead to:

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

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

Please add text here....

[P.4.4 | INDIGENOUS PEOPLES](#)

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

Please add text here....

Would the project potentially involve or lead to:

P.4.4.1 	affect areas where indigenous peoples are present (including project area of influence)	☐ YES ☐ POTENTIALLY ☒ NO
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P.4.4.1 	affect areas, land and territory claimed by indigenous peoples?	☐ YES ☐ POTENTIALLY ☒ NO
P.4.4.1 	impacts (positive or negative) to the human rights, lands, natural resources, territories, and traditional livelihoods of indigenous peoples?	☐ YES ☐ POTENTIALLY ☒ NO
P.4.4.7 	If answer to above questions is "YES" or "POTENTIALLY", - Is it determined that the proposed project may affect the rights, lands, resources, or territories of indigenous people? - Has an "Indigenous People Plan" (IPP) or "Indigenous People Plan Framework" been elaborated and included in the project documentation? - Was the plan developed in accordance with the effective and meaningful participation of indigenous peoples and in accordance with UNDP Guidelines?	☐ YES ☐ NO ☒ NA
P.4.4.3 	risk of forcibly removing indigenous people from their lands and territories?	☐ YES ☐ POTENTIALLY ☒ NO
P.4.4.4 	utilisation and/or commercial development of natural resources on lands and territories claimed by indigenous peoples? Consider, and where appropriate ensure, consistency with the answers under Principle 4.1 above	☐ YES ☐ POTENTIALLY ☒ NO
P.4.4.5 P.4.4.6 	If answer to question above is "YES" or "POTENTIALLY" - Did the project obtain free, prior and informed consent from indigenous people before taking their cultural, intellectual, religious, and/or spiritual property? - Does the project ensure that the indigenous people receive an equitable sharing of benefits resulting from the use of their traditional knowledge and practices? ? - Does the project ensure that the sharing of benefits resulting from the use of indigenous peoples' traditional knowledge and practices is culturally appropriate and inclusive? - Does the project ensure that the provision of equitable sharing of benefits does not impede land rights or equal access to basic services including health services, clean water, energy, education, safe and decent working conditions, and housing?	☐ YES ☐ NO ☒ NA

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

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

Please add text here....

[P.5 | CORRUPTION](#)

P.5.1.1 	Does the project involve, or is it complicit in, contributing to or reinforcing corruption or corrupt projects?	☐ YES ☒ NO
P.5.1.1 	Does the project have a risk of encouraging bribery, kickbacks, or other unethical behavior?	☐ YES ☒ NO

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

Please add text here....

ECONOMIC SAFEGUARDING PRINCIPLES

[P.6 | ECONOMIC IMPACTS](#)

[P.6.1 | LABOUR RIGHTS AND WORKING CONDITIONS](#)

P.6.1.1 	Does the project involve, facilitate, or condone forced labor, or pose a potential risk of forced labor?	☐ YES ☒ NO
P.6.1.1 	Does the project violate any labor or health and safety laws, international obligations, or ILO conventions?	☐ YES ☒ NO
P.6.1.2 	Does the project violate the principles of equal opportunity and fair treatment in its employment decisions?	☐ YES ☒ NO
P.6.1.3 	Does the project violate national laws, if available regarding non-discrimination in employment?	☐ YES ☒ NO

P.6.1.4 P.6.1.5 	Does the project allow child labor?	☐ YES ☒ NO
P.6.1.7 P.6.1.8 	Does the project have insufficient processes and measures in place to ensure the safety and health of project workers?	☐ YES ☒ NO
P.6.1.9 	Does the project have insufficient measures to safeguard and support vulnerable project workers, such as women, people with disabilities, migrant workers, and young workers, and to prevent any kind of harassment, abuse, bullying, or exploitation, including gender-based violence (GBV)?	☐ YES ☒ NO
P.6.1.10 	Does the project have no grievance mechanism available for workers to voice workplace concerns? Is information about this mechanism not provided to workers at the time of recruitment, or is it not easily accessible?	☐ YES ☒ NO

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

Please add text here....

Would the project potentially involve or lead to:

(NOTE: APPLIES TO BOTH PROJECT AND CONTRACTOR WORKERS)

P.6.1.1 	use of forced labour?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.1 	working conditions that do not meet national labour laws and international commitments?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.1 	working conditions that may deny freedom of association and collective bargaining?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.1 	absence of documented working agreements with all individual workers <i>if such agreements do not exist, or do not address working conditions and terms of employment, the project developer shall provide reasonable working conditions and terms of employment.</i>	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.1 	use of migrant workers? <i>if engaged, the developer shall ensure that they are engaged substantially equivalent terms and conditions to non-migrant workers carrying out similar work.</i>	☐ YES ☐ POTENTIALLY ☒ NO

P.6.1.1 	having no arrangements for basic services ¹² for workers? <i>the project developer shall put in place and implement policies on the quality and management of the accommodation and provision of basic services in a manner consistent with the principles of non-discrimination and equal opportunity. Workers' accommodation arrangements should not restrict workers' freedom of movement or of association</i>	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.2 	any form of discrimination or harassment based on factors unrelated to job requirements, such as gender, race, nationality, ethnicity, social or indigenous origin, religion or belief, disability, age, or sexual orientation?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.2 	any form of discrimination in any aspect of employment, such as recruitment, compensation, working conditions, training, job assignment, promotion, termination, or discipline?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.2 	harassment, intimidation, and/or exploitation, especially in regard to women?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.3 	discriminatory working conditions and/or lack of equal opportunity where national law provides provision to address non-discrimination in employment?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.4 	use of child labour? (including third-party engaged workers)	☐ YES ☐ POTENTIALLY ☒ NO
P.6.1.4 	inadequate and verifiable mechanisms for age verification?	☐ YES ☒ NO
P.6.1.7 	no processes and measures in place for the safety and health of project workers?	☐ YES ☒ NO
P.6.1.7 	No provision of safety and health training provisions, including on the proper use and maintenance of personal protective equipment conducted by competent persons and the maintenance of training records?	☐ YES ☒ NO
P.6.1.7 	No provision to record and document accidents, diseases, incidents, and any resulting injuries, illnesses, or deaths?	☐ YES ☒ NO

¹² Basic services requirements refer to minimum space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, noise, fire, and disease-carrying animals, adequate sanitary and washing facilities, ventilation, cooking and storage facilities and natural and artificial lighting, and in some cases basic medical services.

P.6.1.8 	occupational health and safety risks due to physical, chemical, biological and psychosocial hazards (including violence and harassment) throughout the project life-cycle?	☐ YES ☒ NO
P.6.1.9 	No measures to protect vulnerable project workers from harassment, exploitation, and gender-based violence (GBV)? This includes women, people with disabilities, migrant workers, and young workers.	☐ YES ☒ NO
P.6.1.10 	No grievance mechanism available for workers to voice workplace concerns.	☐ YES ☒ NO
P.6.1.11 	No measures for due diligence and the establishment of policies and procedures to manage and monitor the performance of third-party employees in the project?	☐ YES ☒ NO

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

Please add text here....

[P.6.2 | NEGATIVE ECONOMIC CONSEQUENCES](#)

P.6.2.1 	Is there a risk of project failure during implementation or after project certification due to a lack of financial resources?	☐ YES ☒ NO
P.6.2.2 	Does the project have potential negative impacts or pose a risk to the local economy?	☐ YES ☒ NO
P.6.2.2 	Are there any potential risks or negative impacts this project may have on vulnerable or marginalised social groups, despite the benefits it may bring?	☐ YES ☒ NO

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

Please add text here...

Would the project involve or lead to:

P.6.2.2 	economic impacts (negative/detrimental) to the local economy?	☐ YES ☐ POTENTIALLY ☒ NO
P.6.2.2 	negative economic consequences during and after project implementation, e.g., for vulnerable and marginalised social groups in targeted communities?	☐ YES ☐ POTENTIALLY ☒ NO

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

Please add text here....

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

P.7.1 | GHG EMISSIONS

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

Please add text here....

Would the project involve or lead to:

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

Please add text here....

P.7.2 | ENERGY SUPPLY

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

Please add text here....

Would the project involve or lead to:

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

Please add text here....

P.8 | WATER

P.8.1 | IMPACT ON NATURAL WATER PATTERNS/FLOWS

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

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

Please add text here....

Would the project involve or lead to:

P.8.1.1 	affect the natural or pre-existing pattern of watercourses, groundwater and/or the watershed(s) such as high seasonal flow variability, flooding potential, lack of aquatic connectivity or water scarcity?	☐ YES ☐ POTENTIALLY ☒ NO
P.8.1.1 	Wastewater discharge of quality that does not meet the required standard for beneficial reuse?	☐ YES ☐ POTENTIALLY ☒ NO
P.8.1.1 	significant extraction, diversion of ground water? For example, construction of dams, reservoirs, river basin developments, groundwater extraction	☐ YES ☐ POTENTIALLY ☒ NO
P.8.1.2 	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	☐ YES ☐ NO ☒ NA

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

Please add text here....

[P.8.2 | EROSION AND/OR WATER BODY INSTABILITY](#)

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

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

P.9 | ENVIRONMENT, ECOLOGY AND LAND USE

P.9.1 | LANDSCAPE MODIFICATION AND SOIL

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

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

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

P.9.2 | VULNERABILITY TO NATURAL DISASTER

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

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

P.9.3 | BIOSAFETY AND GENETIC RESOURCES

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

Please add text here....

Would the project involve or lead to:

<u>P.9.3.1 </u>	the transfer, handling and use of genetically modified organisms/living modified organisms (GMOs/LMOs) that result from modern biotechnology	☐ YES ☐ POTENTIALLY ☒ NO
<u>P.9.3.1 </u>	If answer to above question is "yes" has a risk assessment by a competent Expert stakeholder been carried out in accordance with Annex iii of the Cartagena protocol on biosafety to the convention on biological diversity?	☐ YES ☐ NO ☒ NA
<u>P.9.3.2 </u>	If answer to above question is "yes" has any risks identified in the risk assessment?	☐ YES ☐ NO ☒ NA

P.9.3.3	Forestry (for example Afforestation/Reforestation) involving GMO planting? <i>Note - Forestry projects (for example Afforestation/Reforestation) involving GMO planting are not eligible for Certification under Gold Standard for the Global Goals.</i>	☐ YES ☐ NO ☒ NA
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If the answer is "yes" or "potentially" to any of the above questions, please provide a brief description of the project situation below. Also, provide justification and/or evidence as necessary to demonstrate compliance with applicable requirements.

Please add text here....

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

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

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

[P.9.5 | HAZARDOUS AND NON-HAZARDOUS WASTE](#)

P.9.5.1	Does the project involve the generation of waste materials (both hazardous and non-hazardous)?	☐ YES ☒ NO
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P.9.5.3 	Does the project involve risk of release of hazardous materials resulting from their production, transportation, handling, storage, or use?	☐ YES ☒ NO
P.9.5.5 	Does the project involve the use of any chemicals or materials subject to international bans or phase-outs?	☐ YES ☒ NO

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

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

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

P.9.6.1 	Does the project involve the use of chemical pesticides?	☐ YES ☒ NO
P.9.6.5 	Does the project involve purchase, store, manufacture, trade or use products that fall in Classes IA (extremely hazardous) and IB (highly hazardous)	☐ YES ☒ NO

P.9.6.6 	Does the project use fertilisers, and if so, are measures being taken to minimise their use and nutrient losses to the environment?	☐ YES ☒ NO
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If the answer to any of the questions above is "yes," please explain project situation and how the project will ensure compliance with applicable requirements.

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

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

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

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

Please add text here....

[P.9.8 | FOOD SECURITY](#)

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

Please add text here....

Would the project involve or lead to:

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

Please add text here....

[P.9.9 | ANIMAL WELFARE](#)

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

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

Please add text here....

Would the project involve or lead to:

P.9.9.1 	animal husbandry or harvesting of fish populations or other aquatic species? ¹³	☐ YES ☒ NO ☐ NA
P.9.9.1 	limiting access for animals to basic needs like drinking water, adequate food, daylight, appropriate shelter etc.?	☐ YES ☐ POTENTIALLY ☒ NO

¹³ 'Involve' means if the project mechanism and/or impact(s) are achieved via changing animal husbandry practices in some way.

P.9.9.3 	inadequate measures to isolate sick animals and control the spread of disease, especially zoonotic diseases?	☐ YES ☒ NO ☐ NA
P.9.9.5 	inadequate low-stress methods, equipment, and facilities that facilitate calm animal movement.	☐ YES ☒ NO ☐ NA
P.9.9.6 	inadequate measures to ensure that animals are exposed to the least stress possible during transportation and slaughtering?	☐ YES ☒ NO ☐ NA
P.9.9.7 	inappropriate spacing per animal and stocking rates per land unit?	☐ YES ☒ NO ☐ NA
P.9.9.8 	inadequate measures to address the specific needs of aquatic animals?	☐ YES ☒ NO ☐ NA
P.9.9.9 P.9.9.10 	primary production of living natural resources such as animal husbandry, aquaculture, and fisheries? If the answer is yes, implement industry-standard sustainable management practices in line with to one or more relevant and credible standards and utilise available technologies.	☐ YES ☒ NO ☐ NA

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

Please add text here....

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

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

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

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

[P.9.11 | ENDANGERED SPECIES](#)

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

Please add text here....

Would the project involve or lead to:		
P.9.11.2 	distortion of habitats of endangered species?	☐ YES ☐ POTENTIALLY ☒ NA
P.9.11.2 	If answer to the above question is "yes", does the project plan to protect and enhance them?	☐ YES ☐ POTENTIALLY ☐ NO ☒ N/A
P.9.11.2 	Are opinions and recommendations of an Expert Stakeholder(s) not sought and demonstrated as being included in the project design?	☐ YES ☐ NO ☒ NA

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

Please add text here....

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

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

Please add text here....

Would the project involve or lead to:

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

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

Please add text here....

APPENDIX 2 - CONTACT INFORMATION OF PROJECT DEVELOPER(S)

Organization name	Çanres Elektrik Üretim A.Ş.	
Registration number with relevant authority		
Street/P.O. Box	Kısıklı Cad. Sarkuysan Ak İş Merkezi	
Building	No:4/A K:2	
City	Altunizade Üsküdar / İSTANBUL	
State/Region	İstanbul	
Postcode	34622	
Country	TÜRKİYE	
Telephone	+90 216 554 54 35	
E-mail	finaenerji@finaenerji.com	
Website	http://www.finaenerji.com.tr	
Contact person	Ömer Faruk Çiftçi	
Title		
Salutation	Mr	
Last name	Çiftçi	
Middle name		
First name	Ömer Faruk	
Department	Senior Specialist – Business Development	
Mobile		
Direct tel.	+90 216 554 54 35	
Personal e-mail	Omer.Ciftci@finaenerji.com	

APPENDIX 3 - LUF ADDITIONAL INFORMATION

Risk of change to the Project Area during Project Certification Period:	
Risk of change to the Project activities during Project Certification Period:	
Land-use history and current status of Project Area:	
Socio-Economic history:	
Forest management applied (past and future)	
Forest characteristics (including main tree species planted)	
Main social impacts (risks and benefits)	
Main environmental impacts (risks and benefits)	
Financial structure	
Infrastructure (roads/houses etc):	
Water bodies:	
Sites with special significance for indigenous people and local communities - resulting from the Stakeholder Consultation:	
Where indigenous people and local communities are situated:	
Where indigenous people and local communities have legal rights, customary rights or sites with special cultural, ecological, economic, religious or spiritual significance:	

APPENDIX 4 - DESIGN CHANGES

A4.1. Details of proposed or actual design change

The proposed design change relates to the expansion of the installed capacity of Şadıllı Wind Power Plant (WPP) through the addition of new wind turbine generators within the licensed project area.

Under the originally registered project activity, Şadıllı WPP consisted of 14 wind turbines with an installed capacity of 2.75 MW each, resulting in a total installed capacity of 38.5 MW.

Following the design change, six additional wind turbines with a rated capacity of 6.0 MW each are planned to be installed within the project boundary.

The addition of these six turbines increases the total physical installed capacity of the wind farm to 74.5 MW.

However, in accordance with Gold Standard for the Global Goals requirements regarding capacity increases (maximum 20% increase from the originally registered capacity), only the eligible installed capacity of 46.2 MW (i.e., $38.5 \text{ MW} \times 1.20$) will be considered under the Gold Standard project boundary for the purpose of emission reduction calculations.

While the physical installed capacity of the wind farm exceeds this threshold, emission reductions will be calculated and claimed only for the eligible capacity of 46.2 MW in line with Gold Standard requirements.

The additional turbines are located within the existing licensed area and are connected to the same national grid connection point. The project technology remains wind-based grid-connected electricity generation and continues to apply the same approved methodology (ACM0002).

No change occurs in the fundamental project type, baseline approach, or monitoring methodology as a result of this design change. The modification solely concerns the expansion of installed capacity.

A4.2. Describe the impacts of design change on the following

a. Additionality

The proposed design change involves the expansion of installed capacity through the addition of new wind turbine generators within the licensed project area. The capacity increase requires additional capital investment and updated financial planning.

Given that the expansion constitutes a material modification to the originally registered project activity in terms of installed capacity and investment scale, the financial attractiveness of the project has been reassessed in line with the "Tool for the Demonstration and Assessment of Additionality".

An updated investment analysis has been conducted considering the revised installed capacity and associated investment costs. The analysis confirms that, without revenues from Gold Standard VERs, the project activity – including the expanded capacity – remains financially unattractive compared to the applicable benchmark. Therefore, the additionality of the project activity is maintained after the design change.

The design change does not alter the fundamental nature of the project activity as a grid-connected renewable energy project, nor does it introduce alternative financially superior scenarios. The continuation of operation and the expanded capacity remain dependent on carbon revenue support.

Accordingly, the project continues to meet the additionality requirements under Gold Standard for the Global Goals after implementation of the design change.

b. Applicability of methodology and other methodological regulatory documents with which the project activity has been certified

The proposed design change does not affect the applicability of the approved baseline and monitoring methodology.

Şadılı WPP continues to apply the approved large-scale consolidated methodology ACM0002 (version 22.0), "Grid-connected electricity generation from renewable sources", as originally registered.

The project activity, including the expanded capacity, remains a grid-connected renewable electricity generation project using wind energy. The fundamental characteristics of the project activity have not changed: electricity is generated from wind and supplied to the Turkish National Grid. No modification to the energy source, technology type, or grid connection structure has occurred.

The applicability conditions of ACM0002 continue to be fully met:

- The project is a grid-connected renewable power generation activity;*
- It does not involve switching from fossil fuels to renewable energy at the project site;*
- It does not involve retrofitting of fossil-fuel-based generation;*
- The baseline scenario remains electricity supplied by grid-connected power plants.*

Furthermore, the methodological tools applied together with ACM0002 — including:

- Tool to calculate the emission factor for an electricity system,
- Tool for the demonstration and assessment of additionality,
- Tool to determine the remaining lifetime of equipment, and
- Tool for assessment of the validity of the baseline at crediting period renewal,

remain applicable without modification.

The design change solely concerns an increase in installed capacity within the licensed project area and does not introduce any new technology or methodological category.

Therefore, the applicability of the methodology and all associated regulatory documents remains unchanged after the implementation of the design change.

c. Compliance with the monitoring plan of the applied methodology

The proposed design change does not affect compliance with the monitoring plan of the applied methodology ACM0002.

The monitored parameter remains the net amount of electricity supplied to the Turkish National Grid. Electricity generation is continuously measured through calibrated and redundant metering systems installed at the substation, in line with the originally approved monitoring plan.

The addition of new wind turbines does not introduce any new emission sources, monitoring parameters, or data collection procedures. All electricity generated by the wind farm continues to be measured through the same grid connection point and recorded through the established metering infrastructure.

For the purpose of emission reduction calculations under Gold Standard, emission reductions will be claimed only for the eligible installed capacity of 46.2 MW, in accordance with the 20% capacity increase limitation. As no separate metering is installed for the additional turbines, the monitoring approach remains unchanged and total generation continues to be measured through the existing grid connection point. The eligible share of electricity generation is determined by applying the ratio of eligible to total installed capacity ($46.2 \text{ MW} / 74.5 \text{ MW} = 62.01\%$) to the total metered generation, subject to the annual generation cap of 134,400 MWh ($1.2 \times$ the originally registered generation) as an upper bound. This allocation methodology is described in full in Section B.7.3.

Data management, quality assurance and quality control procedures remain identical to those described in the Monitoring Plan. No additional monitoring equipment or new parameters are required as a result of the design change.

Therefore, the project activity remains fully compliant with the monitoring requirements of ACM0002 and associated methodological tools following the implementation of the design change.

d. Level of accuracy and completeness in the monitoring of the project activity compared with the requirements contained in the registered monitoring plan

The proposed design change does not affect the level of accuracy or completeness of monitoring as defined in the registered Monitoring Plan.

The primary monitored parameter remains the net electricity supplied to the grid. Measurement continues to be carried out through calibrated, revenue-grade meters installed at the grid connection point. The metering configuration remains unchanged, and redundant meters are in place to ensure reliability and minimize uncertainty.

The addition of new wind turbines does not alter the metering system, data acquisition process, or quality assurance and quality control (QA/QC) procedures. All electricity generated by the wind farm, including generation from the expanded capacity, continues to be measured through the same infrastructure.

Data are collected, recorded, archived and cross-checked in accordance with the established procedures described in the registered Monitoring Plan. Remote meter readings from TEİAŞ, monthly cross-checks, EPIAŞ settlement records and internal verification procedures remain in place.

Therefore, the accuracy, transparency and completeness of monitored data are maintained at the same level as defined in the registered Monitoring Plan. The design change does not introduce any additional uncertainty or data gaps.

Accordingly, the project activity continues to comply fully with the monitoring accuracy and completeness requirements of the applied methodology.

e. Scale of the project activity

The proposed design change results in an increase in the physical installed capacity of Şadıllı WPP through the addition of six new wind turbine generators, increasing the total physical installed capacity from 38.5 MW to 74.5 MW.

However, in accordance with Gold Standard requirements regarding capacity increases, only the eligible installed capacity of 46.2 MW (i.e., a maximum 20% increase from the

originally registered capacity) will be considered under the Gold Standard project boundary for emission reduction calculations.

The project activity was originally registered as a large-scale grid-connected renewable energy project under ACM0002. Following the design change, the project remains a large-scale activity. The capacity expansion does not alter the scale classification of the project under the applicable methodology.

Therefore, while the physical capacity of the wind farm has increased, the scale classification of the project activity under Gold Standard and the applied methodology remains unchanged.

f. Stakeholder consultation

The proposed design change involves the expansion of installed capacity through the addition of new wind turbine generators within the licensed project area. Although the project technology and overall impact profile remain consistent with the originally registered activity, the capacity expansion represents a material modification in terms of installed capacity.

In line with Gold Standard requirements and in order to ensure transparency and continued stakeholder engagement, an additional Local Stakeholder Consultation (LSC) meeting will be conducted specifically addressing the proposed design change.

The purpose of the additional consultation is to inform stakeholders about the planned capacity expansion, present any potential incremental environmental and social impacts, and collect stakeholder feedback prior to implementation under the Gold Standard framework.

Environmental assessment procedures for the additional turbines have been carried out in accordance with national legislation. The stakeholder consultation under Gold Standard will complement the national permitting process by ensuring that all relevant stakeholders are appropriately informed and have the opportunity to provide input.

The outcomes of the consultation process will be documented and addressed in accordance with Gold Standard requirements.

g. Sustainable development criteria

The proposed design change does not negatively affect the sustainable development contribution of the project activity. On the contrary, the expansion of installed capacity

is expected to enhance the positive environmental and socio-economic impacts associated with renewable electricity generation.

The project continues to contribute to the Sustainable Development Goals (SDGs), particularly SDG 7 (Affordable and Clean Energy), SDG 8 (Decent Work and Economic Growth), SDG 13 (Climate Action), and SDG 6 (Clean Water and Sanitation), as originally identified in the registered project documentation.

The increased renewable electricity generation capacity contributes to further displacement of grid electricity predominantly generated from fossil fuels, thereby supporting additional climate mitigation benefits under SDG 13. The expansion also sustains and potentially increases local employment opportunities during both construction and operation phases, contributing to SDG 8.

Environmental and social impacts associated with the additional turbines have been assessed under applicable national environmental legislation. No fundamentally new types of environmental or social risks have been introduced as a result of the design change. The project technology remains wind-based renewable electricity generation, and operational characteristics remain consistent with the originally registered activity. The safeguarding principles applicable to the project remain valid and unaffected by the capacity expansion. The project continues to comply with national environmental, social and regulatory requirements.

Therefore, the sustainable development contribution of Şadılı WPP is maintained and reinforced following the implementation of the design change.

h. Safeguarding assessment

The proposed design change has been assessed against the Gold Standard Safeguarding Principles and does not introduce any new significant environmental or social risks compared to the originally registered project activity.

The capacity expansion consists of the installation of additional wind turbines within the existing licensed project area. Environmental Impact Assessment (EIA) procedures for the additional turbines have been conducted in accordance with applicable national legislation. For part of the expansion, a formal EIA process was completed, and for the remaining turbines, an official "EIA Not Required" decision was obtained from the competent authority.

The project technology remains grid-connected wind power generation. No new fuel types, hazardous materials, or fundamentally different operational processes are introduced as a result of the design change.

Potential impacts related to land use, biodiversity, noise, visual impact, and occupational health and safety have been addressed within the national permitting framework and remain consistent with the originally assessed project profile.

The project continues to comply with all applicable national environmental, labor, and regulatory requirements. No additional safeguard risks have been identified that would alter the risk categorization of the project under Gold Standard.

Therefore, the safeguarding assessment remains valid following the implementation of the design change.

i. Compliance with applicable legislation

The proposed design change has been implemented in compliance with all applicable national legislation and regulatory requirements of the Republic of Türkiye.

The capacity expansion has been carried out within the framework of the valid electricity generation license issued by the Energy Market Regulatory Authority (EMRA). Where required, relevant amendments and approvals have been obtained in accordance with national energy legislation.

Environmental permitting procedures for the additional wind turbines have been completed under the applicable Environmental Impact Assessment (EIA) Regulation. For part of the additional capacity, a full EIA process was conducted and approved by the competent authority. For the remaining turbines, an official "EIA Not Required" decision was issued. These decisions confirm compliance with national environmental legislation.

The design change does not introduce any activity that would conflict with existing land use regulations, labor legislation, environmental protection laws, or other sectoral regulations.

The project continues to comply with all applicable legal and regulatory requirements, including environmental, health and safety, labor, and electricity market regulations. No cases of non-compliance have been identified in relation to the design change.

Therefore, the project activity remains fully compliant with applicable legislation following the implementation of the design change.

j. **Only for LUF Projects:** Transparent summary of all approved changes in Project Area, Eligible Area and accompanying changes in ex-ante emissions removals.

N/A

DATE OF APPROVED DESIGN CHANGE (MM/DD/YYYY)	PROJECT AREA (HA)		ELIGIBLE AREA (HA)		EX-ANTE ESTIMATE (TCO2E)	
	INCREASE OR DECREASE ?	VALUE (HA)	INCREASE OR DECREASE?	VALUE (HA)	INCREASE OR DECREASE ?	PERCENTAGE (%)

DOCUMENT HISTORY

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