



**Verified Carbon
Standard**

DENİZLİ WIND POWER PROJECT, TURKEY

VALIDATION REPORT

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Project title	Denizli Wind Power Project, Turkey
Project ID	1908
Crediting period	13-September-2019 to 12-September-2029
Original date of issue	22-May-2026
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Version	03
VCS Standard Version	4.7
Client	Korda Enerji Üretim Pazarlama İthalat ve İhracat A.Ş.
Prepared by	BM Certification SIA
Approved by	Maris Zamovskis

	Managing Director of BM Certification SIA
	
Work carried out by	Fikriye Seda Atabek-Team Leader Şeymanur Ersoy-Validator

Summary:

BM CERTIFICATION SIA carried out the validation of a Design Change for the Denizli Wind Power Project, Türkiye (VCS ID 1908), situated in the Denizli province of Türkiye. The validation aimed to evaluate the compliance of the updated project design, including the addition of solar PV capacity, added wind turbines with the requirements of the Verified Carbon Standard (VCS) Program (Version 4.7) and the applied methodology ACM0002 (Version 19).

The validation scope included the assessment of the project description, baseline scenario determination, demonstration of additionality, GHG emission reduction quantification, monitoring plan (MP), and conformity with applicable legal and environmental requirements. The validation process was undertaken through a comprehensive review of project documentation and interviews with the Project Participant (PP) and relevant stakeholders, in line with ISO 14064-3 and BM CERTIFICATION SIA internal validation procedures and Verified Carbon Standard (VCS) Program (Version 4.7).

During the validation process, 36 Corrective Action Requests, 00 Clarification Requests, and 00 Forward Action Requests were raised, all of which were satisfactorily resolved and closed. No material uncertainties that could impact the validation conclusion were identified.

Based on the evidence assessed, BM CERTIFICATION SIA concludes that the project activity complies with all relevant requirements of the VCS Standard (Version 4.7) and recommends approval of the design change for continued crediting under the VCS Standard.

BM CERTIFICATION SIA further confirms the following, based on the results of the document review conducted for the crediting period from 13-September-2019 to 12-September-2029:

Year	Estimated GHG emission reductions or removals (tCO _{2e})
13/09/2019-31/12/2019	31,831
2020	105,622
2021	105,622

2022	105,622
2023	105,622
2024	105,622
2025	198,116
2026	204,336
2027	204,336
2028	204,336
01/01/2029-12/09/2029	142,755
Total	1,513,821
Total number of crediting years	10
Average annual ERs	151,382

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1 INTRODUCTION

1.1 Objective

Under a Validation Agreement with no 111-03-2026 dated 06/03/2026, BM CERTIFICATION SIA was engaged by “Korda Enerji Üretim Pazarlama İthalat ve İhracat A.Ş.” (hereafter referred to as “PP”) to carry out the Design Change Validation of the project activity “Denizli Wind Power Project, Turkey” (VCS Registry No.: 1908) located in the “Denizli” Province of Türkiye.

The aim of this validation was to conduct an independent and objective assessment to determine whether:

- the revised Project Description (PD) is in conformity with the applicable requirements of the VCS Standard (Version 4.7) and the approved methodology ACM0002 (Version 19);
- the Monitoring Plan (MP) remains consistent with the methodology and associated tools and
- the project activity continues to comply with relevant host-country regulations and requirements.

1.2 Scope and Criteria

The scope of this Design Change Validation is the independent and objective assessment of the revised PD for the Denizli Wind Power Project, Türkiye (hereafter referred to as the “project activity”), which incorporates additional solar PV capacity and supplementary wind turbines to the existing wind farm under the overall design change process.

The validation was carried out to assess whether the proposed design changes have been correctly and fully reflected in the revised PD and the Monitoring Plan (hereafter referred to as the “MP”) and are in compliance with the requirements of the VCS Standard (Version 4.7), the VCS Validation and Verification Manual (Version 3.2), and ISO 14064-3:2019.

BM CERTIFICATION SIA adopted a risk-based approach to assess the completeness, consistency, and accuracy of the information provided and to identify any issues that could influence the integrity of the baseline scenario or the potential emission reductions.

The assessment was conducted in an independent manner, and BM CERTIFICATION SIA did not provide any consulting services to the PP throughout the validation process.

The only purpose of this validation is to support the registration of the project activity under the VCS Standard.

1.3 Reasonableness of Assumptions

As per VCS standard sec 4.1.2,(2), BM CERTIFICATION SIA confirms that this validation was conducted at a reasonable level of assurance in accordance with ISO 14064-3:2019 and the VCS Validation and Verification Manual (Version 3.2). The resulting validation opinion provides a moderate yet dependable level of confidence that the information contained in the PD is free from material inaccuracies, omissions, or misstatements.

All key data, parameters, and assumptions used for the estimation of GHG emission reductions were fully reviewed without the application of sampling techniques. The review particularly focused on:

- the consistency of installed-capacity data, wind and solar resource evaluations, and electricity generation estimates;
- the suitability and conservativeness of baseline emission factor assumptions applied under ACM0002 (Version 19); and
- the traceability and transparency of data sources and calculation methodologies.

Based on the outcome of this review, BM CERTIFICATION SIA considers the data and assumptions presented in the PD to be reasonable, coherent, and appropriate for estimating the expected Verified Carbon Units (hereafter referred to as “VCUs”) under the VCS Standard (Version 4.7).

1.4 Summary Description of the Project

Initially, the project activity involves the installation and operation of 3 MWe wind turbines and originally consisted of 22 wind turbines. The electricity generated by the project is supplied to the Tavas TM and Denizli Batı 380 TM grid connection point. Under the initial project design, the estimated annual net electricity generation was 186,100 MWh. By utilizing available wind resources efficiently, the project activity displaces grid electricity generated predominantly from fossil fuel-based sources. As a result, the project was expected to achieve annual emission reductions of 105,622 tonnes of CO₂e. Total emission reductions during the first crediting period, from 13/09/2019 to 12/09/2029, were estimated at 1,056,220 tonnes of CO₂e.

The original project design was subsequently revised through the addition of five new wind turbines and an additional solar power unit. Following the increase in the number of turbines from 22 to 27 and the integration of the solar component, the project license was updated accordingly. The Project initially had an installed capacity of 66 MW. After the solar equipment agreement signed on 03/04/2024 /18/, an additional solar unit with a capacity of 5.7629 MWm was incorporated into the Project. Later, pursuant to the turbine supply agreement signed with Nordex on 23/07/2024 for five additional turbines /17/, the total installed capacity of the Project was revised to 104.5629 MWm / 90 MWe, and the project license was amended accordingly.

	Number of Turbines	Total Capacity	Date of Being operational	Estimated Annual Net Electricity Generation (MWh/y)	Estimated Emission Reduction (tCO ₂ /y)
Initial Design	22 WTG	66 MWm/MWe	13-September-2019	186,100	105,622
After Design Deviation	27 WTG	104.5629 MWm-90 MWw (5.7629 MWm Solar Part; 98.8 MWm Wind/90 MWe Wind)	Partial Commissioning ; -from T23 to T26; 22-August-2025 -T27; 04-September-2025	360,000	151,382

The solar unit was partially commissioned on 23/01/2025 and 04/09/2025. Of the total solar capacity, 4.5188 MWm was commissioned on 23/01/2025, while the remaining 1.2441 MWm was commissioned on 04/09/2025. Additional turbines T23–T26 were commissioned on 22/08/2025, whereas turbine T27 and the remaining solar unit were commissioned on 04/09/2025. Following these additions, the estimated annual electricity generation of the Project was revised to 360,000 MWh/year. The estimated annual emission reductions during the first crediting period are expected to reach 151,382 tCO₂e. Total emission reductions from the project activity for the first crediting period, covering 13/09/2019–12/09/2029, are estimated at 1,513,821 tonnes of CO₂e. In addition, the project activity is expected to contribute to the wider deployment of wind and solar energy technologies and support the expansion of national power generation capacity.

Technical Properties of equipment have been validated via product specifications and on site observations as below:

Technical specifications of Siemens SWT-3.4-108 Curtailed to 3MW

Specifications	Siemens SWT-3.4-108
Rated Power (kW)	3000
Rotor Diameter (m)	108
Blade Length (m)	53
Num. of Blades	3
Swept Area (m ²)	9144
Cut-out wind speed (m/s)	25

Technical specifications of Nordex N133/4800 /14/

Specifications	Nordex
Rated Power (kW)	4800
Rotor Diameter (m)	133
Hub Height (m)	83
Num. of Blades	3
Cut-in wind speed (m/s)	3
Cut-out wind speed (m/s)	28

Technical specifications of solar unit /23/

Specifications	SPE 550 Half Cut Bifacial
Number of Power Modules	15288
Maximum Power (Wp)	550
Power Tolerance	0~+5 W
Maximum Power Voltage (Vmp)	42.15
Maximum Power Current (Imp)	13.07
Open Circuit Voltage (Voc)	49.74
Short Circuit Current (Isc)	13.86
Maximum System Voltage	1500 V DC
External Dimensions (L × W × H)	2278 mm × 1134 mm × 35 mm
Operating Temperature Range	-40 °C to +85 °C
Nominal Operating Temperature	-45 °C ±2

The project will support Türkiye in promoting and commercializing grid-connected renewable energy technologies and markets. Furthermore, the project will demonstrate the feasibility of grid-connected wind farms and solar installations, contributing to enhanced energy security, improved air quality, sustainable energy development, better local livelihoods, and the advancement of the renewable energy sector. The specific objectives of the project are to:

- reduce greenhouse gas emissions in Türkiye compared to the business-as-usual scenario;
- support the development of the wind and solar power sectors in Türkiye;
- create local employment opportunities during both the construction and operational phases of the wind and solar facilities;
- reduce other pollutants associated with electricity generation in Türkiye compared to the business-as-usual scenario;
- contribute to reducing Türkiye's growing energy deficit; and
- diversify the national electricity generation mix while decreasing dependency on imported energy sources.

2 VALIDATION PROCESS

2.1 Method and Criteria

This Design Change Validation was carried out in accordance with ISO 14064-3, the VCS Validation and Verification Manual (Version 3.2) and BM CERTIFICATION SIA's internal Operating Procedures.

A risk-based validation approach was employed to assess the completeness, consistency, and accuracy of the revised Project Description (PD) and to verify that the updated project design remains in compliance with the requirements of the VCS Standard (Version 4.7) and the applicable methodology ACM0002 (Version 19).

Validation Team and ITR details

Name	Role	Responsibility(ies)*
Fikriye Seda Atabek	Team Leader, Technical Expert	DR, SV, RP
Şeymanur Ersoy	Validator	AP, DR, SV, RP
Jaya Rajput	Independent Technical Reviewer	ITR, DM

AP: Administrative Procedure

DR: Desk Review

SV: Site Visit

RP: Report Preparation

ITR: Internal Technical Review

DM: Decision Maker

2.2 Document Review

The basis for the design change validation activity is the VCS PD version 07 dated 16/03/2026 /01/, which was submitted to the verification team on the same date. The latest version is v11 dated 04/09/2026/26/ which is the basis for this validation.

The following actions were involved in the desk review:

- A review of the data and information presented to verify their completeness
- A review of the monitoring plan and monitoring methodology, paying particular attention to the frequency of measurements, the quality of metering equipment, including calibration requirements, and the quality assurance and quality control procedures

- An evaluation of data management and the quality assurance and quality control system in the context of their influence on the generation and reporting of emission reductions

The list of the documents that were reviewed for this Validation is given in the table below:

Document Number	Document Name	Version	Date
D01	PD	7	16/03/2026
D02	PD	8	14/04/2026
D03	ER Calculation Excel Sheet	01	11/02/2026
D04	IRR	01	16/03/2026
D05	IRR	02	14/04/2026
D06	Common Practice Analysis	01	16/03/2026
D07	Common Practice Analysis	02	14/04/2026
D08	Provisional Acceptances	-	10/10/2019, 13/09/2019 for initial turbines, 04/09/2025, 22/08/2025 for additional wind turbines, 23/01/2025 and 04/09/2025 for SPP
D09	EIA not required for SPP addition	-	19/01/2022
D10	EIA positive decision for added wind turbines	-	14/07/2020
D11	Feasibility for added wind turbines	-	18/03/2024
D12	Revised License	-	07/11/2019
D13	Single line diagram	-	-
D14	Nordex technical documents	-	-
D15	Grievance letter from Ataköy village Head	-	09/04/2026
D16	Meter tests for 2025	-	17/08/2025
D17	Nordex agreements	-	Service Agreement- 23/07/2024 Supply Agreement- 23/07/2024
D18	SPP agreements	-	Panel agreement- 03/04/2024 EPC agreement- Asunim Enerji- 03/04/2024
D19	SPP feasibility by PVsyst	-	01/04/2024
D20	Registered PD	6	13/10/2021
D21	Registered Validation Report by RINA	4.0Aa	17/12/2021
D22	Initial IRR excel file	-	30/04/2019

Document Number	Document Name	Version	Date
D23	SPP Technical specifications	-	-
D24	PD	9	05/06/2026
D25	PD	10	08/06/2026
D26	PD	11	04/09/2026

2.3 Interviews

During site visit the following notes were taken by the Team Leader:

Approximately 90% of the access route to the project site passes through Ataköy Village, which is located around 15 km from the project area. The roads have been used both during the construction phase and during current operations by the Project Owner (PO). Although certain sections of the roads were damaged during construction activities, repair works were completed in 2020. It was also noted that another nearby power plant uses the same access roads. No issues related to excavation waste or general waste management were identified. A limited number of expropriations were carried out for the project; however, no ongoing legal disputes or court cases involving residents of Ataköy Village were reported.

No bird strikes have been observed since the start of operations. The project currently employs 10 Akfen personnel and 4 security staff from Zep Güvenlik, all of whom are recruited locally. The PO has also contributed to the local community through various social support activities, including the donation of a corn harvesting vehicle, other agricultural equipment, a weighbridge and its maintenance, concrete works for the village wedding hall, renovation of the health center and muhtar office, and installation of security cameras.

According to information obtained during stakeholder consultations, no significant problems or conflicts related to the project have occurred to date. The SPP installations, new turbine units and their potential impacts were explained to the residents of Ataköy Village. Local shepherds continue to access and move freely within the area and stated that they have never experienced any disputes with the PO. It was also confirmed that the solar power plants (GES) were commissioned in February and September 2025. In addition, TRA and TRB meters together measure the total electricity generation of the plant.

During the on-site visit, the mukhtar of Ataköy Village and Karacasu residents confirmed that the local stakeholders were informed about the project activity before the implementation of design change. Also, he stated that no complaints were received by the local stakeholders during the current monitoring period.

Furthermore, there had not been any complaints raised by the interviewed local stakeholders during the on-site visit dated 09/04/2026. The local stakeholders were interviewed about the following issues, and there had not been any complaints by the interviewed local stakeholders during the on-site visit:

- Design change impacts

- Sufficiency of local employment (The interviewed local stakeholders were pleased about the local employment opportunities provided by the project owner)
- Waste management practices implemented by the project owner

It was also concluded that the grievance mechanism is in place, and this was also confirmed by the interviewed local stakeholders during the on-site visit. Signed Declaration from Ataköy Village Mukhtar for Grievance Mechanism dated 09/04/2026 is provided to VVB /15/. Also, it is confirmed during site visit that no complaints from the local stakeholders have been taken during the current monitoring period.

Interviews				
Interviewee Name ¹	Affiliation/Role	Date	Topic	Team Member
Hüseyin D. (Male)	Ataköy Village - Muhtar	09/04/2026	Local Stakeholder Consultation on Design Change, Feedback/Grievance mechanism, advantages and disadvantages of the project	Fikriye Seda Atabek
Osman K. (Male)	Ataköy Village - Local Stakeholder			
Ali Z. (Male)	Karacasu Village - Local Stakeholder			
Onur A. (Male)	Denizli WPP - Plant Manager	09/04/2026	Project Description, Project Boundary, Baseline Calculation, Regulatory requirements, Monitoring procedures & Calibration of meters, Operation and Maintenance Procedure, Data recording and archiving, Emergency	Fikriye Seda Atabek
Müdanis D. (Male)	Denizli WPP- Operator and Karacasu Village - Local Stakeholder			

¹ Stakeholder consent for public disclosure of identities was not obtained. Accordingly, the VVB has submitted a confidential verification report containing all stakeholder names to VERRA, and a public version with stakeholder names redacted.

			procedures, Safety Procedures	
Validated/Verified Information			Source of Information	
Checking the technical specifications of the Installed Technology and Monitoring Equipment			Physical site visit observations and interview with the business manager	
Assessing the continuity of the Baseline Scenario			Physical site visit observations, interview with the local stakeholders	
Location of the Project			Physical site visit observations and GPS	
Assessing monitoring approaches (e.g., SCADA system)			Physical site visit observations, interview with the business manager, and the employees	
Receiving comments from Local Stakeholders			Interviews with the local stakeholders	
Review of information flows for generating, aggregating, and reporting the monitoring parameters			Document review, physical site visit observations, and interviews with the project proponent representatives	
Cross-check between information provided in the PDD and data from other sources such as plant logbooks, purchase records, or similar data sources			Physical site visit observations, document review	
Identification of quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters			Document review, physical site visit observations, and interviews with the project proponent representatives	

2.4 Site Visits

As a part of the validation activities, a physical site visit was performed to the project activity site on 09/04/2026 and details of which can be seen in below:

Date	09/04/2026
Activity performed on-site	Checking technical specifications of the Installed Technology and Monitoring Equipment Location of the Project Activity Assessing monitoring approaches (e.g. SCADA system) Receiving comments from Local Stakeholders Review of information flows for generating, aggregating and reporting the monitoring parameters Cross-check between information provided in the VCS PD and data from other sources such as plant log books, or similar data sources

	Identification of quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters
Site location	Project Site (On-site)
Team member(s), Role(s), Activity(ies)	Fikriye Seda Atabek (Team Leader / Technical Expert)

All the monitoring parameters furnished by the project proponent have been cross-checked with the electronic records and operational logbooks.

2.5 Resolution of Findings

To ensure transparency a validation protocol, which shows in a transparent manner criteria (requirements), means of validation and VVB findings and final VVB conclusions, is customized for the project activity. All findings and outstanding issues, identified during the desk review and discussed during the site observation, are included in a list of CARs, CLs and FARs.

Clarification requests (CR), corrective action requests (CAR) and forward action requests (FAR)

Finding Topics	No. of CR	No. of CAR	No. of FAR
Project design document		1,12, 13,15,34,35	
Description of project activity		2,3,4,5,6,36	
Application of selected baseline and monitoring methodology and selected standardized baseline			
- Applicability of methodology and standardized baseline		8,14, 30, 31	
- Deviation from methodology			
- Clarification on applicability of methodology, tool and/or standardized baseline			
- Project boundary			
- Establishment and description of baseline scenario			
- Project eligibility			
- Demonstration of additionality		11, 17,18,19,20, 21,22,	
-Sustainability assessment			
- Emission reductions		7,23,32,33	
- Monitoring plan		24	
- Sustainability Monitoring plan		25,29	
Duration and crediting period		9, 10, 16	
Environmental impacts		26,28	
Local stakeholder consultation		27	
Pre-feasibility assessment			
Total		36	

As the final validation step, comprehensive documentation, including the validation report and its appendices, undergoes internal quality control through the Independent Technical Review process. Once the Team Leader completes the Validation Report, it is forwarded to an Independent Technical Reviewer. At this stage, not only the report but also all supporting documents, such as emission reduction calculations and relevant Excel sheets /03/, undergo a thorough review. The Independent Technical Reviewer may issue Corrective Action Requests (CARs) and Clarification Requests (CLs) as needed for further clarification. Upon closure of all CARs and CLs, the request for issuance, aligned with the positive validation opinion and accompanied by all relevant documents, is submitted to VERRA.

2.5.1 Forward Action Requests

BM CERTIFICATION SIA did not raise any Forward Action Requests (FARs) during this design-change validation. There were no FARs from previous processes.

All matters relevant to the design change were resolved during the validation stage through the closure of Corrective Action Requests (CARs) and Clarification Requests (CLs). No issues requiring attention in subsequent verification periods were identified.

3 VALIDATION FINDINGS

3.1 Project Details

Initially, the project activity involves the installation and operation of 3 MWe wind turbines and originally consisted of 22 wind turbines. The electricity generated by the project is supplied to the Tavas TM and Denizli Batı 380 TM grid connection point. Under the initial project design, the estimated annual net electricity generation was 186,100 MWh. By utilizing available wind resources efficiently, the project activity displaces grid electricity generated predominantly from fossil fuel-based sources. As a result, the project was expected to achieve annual emission reductions of 105,622 tonnes of CO₂e. Total emission reductions during the first crediting period, from 13/09/2019 to 12/09/2029, were estimated at 1,056,220 tonnes of CO₂e.

The original project design was subsequently revised through the addition of five new wind turbines and an additional solar power unit. Following the increase in the number of turbines from 22 to 27 and the integration of the solar component, the project license was updated accordingly.

The Project initially had an installed capacity of 66 MW. After the solar equipment agreement signed on 03/04/2024 /18/, an additional solar unit with a capacity of 5.7629 MWm was incorporated into the Project. Later, pursuant to the turbine supply agreement signed with Nordex on 23/07/2024 for five additional turbines /17/, the total installed capacity of the Project was revised to 104.5629 MWm / 90 MWe, and the project license was amended accordingly. The

solar unit was partially commissioned on 23/01/2025 and 04/09/2025. Of the total solar capacity, 4.5188 MWm was commissioned on 23/01/2025, while the remaining 1.2441 MWm was commissioned on 04/09/2025. Additional turbines T23–T26 were commissioned on 22/08/2025, whereas turbine T27 and the remaining solar unit were commissioned on 04/09/2025. Following these additions, the estimated annual electricity generation of the Project was revised to 360,000 MWh/year. The estimated annual emission reductions during the first crediting period are expected to reach 151,382 tCO₂e. Total emission reductions from the project activity for the first crediting period, covering 13/09/2019–12/09/2029, are estimated at 1,513,821 tonnes of CO₂e. In addition, the project activity is expected to contribute to the wider deployment of wind and solar energy technologies and support the expansion of national power generation capacity.

Following the design change, the project activity was reconfigured as a hybrid renewable-energy facility combining wind and solar generation sources. The additional components share the same internal and external grid infrastructure, including the switchyard and transmission line, without increasing the project's maximum licensed grid injection capacity. The solar units enhance generation stability and renewable energy utilization during periods of low wind availability as a supportive source.

As confirmed by the updated generation license issued by the Energy Market Regulatory Authority (hereafter referred to as "EMRA") with decision dated 07/11/2019, which is a continuation of the previous license issued on 18/08/2011.

The project is located in Denizli Province, Babadağ District, Demirli Village. Some parts of the plant are located in Aydın Province, Karacasu District. The coordinates, as well as the precise locations of the solar arrays, were validated during the physical site visit and cross-referenced with KMZ mapping data, the generation license and layout drawings provided by the PP.

Wind Turbine No.	Latitude (N)	Longitude (E)
1	37° 47' 20.6232''	28° 46' 23.1853''
2	37° 47' 12.2208''	28° 47' 01.8137''
3	37° 47' 03.9120''	28° 47' 14.8588''
4	37° 47' 01.2264''	28° 47' 27.2621''
5	37° 47' 00.8664''	28° 47' 48.5921''
6	37° 46' 57.2304''	28° 48' 07.8802''
7	37° 46' 48.7524''	28° 48' 21.2862''
8	37° 46' 40.6128''	28° 48' 27.3013''
9	37° 46' 28.7040''	28° 48' 38.1288''
10	37° 46' 27.5160''	28° 49' 06.7112''
11	37° 46' 22.2780''	28° 49' 16.2287''
12	37° 46' 20.9208''	28° 49' 30.3374''
13	37° 46' 16.3164''	28° 49' 51.1912''
14	37° 46' 10.6140''	28° 50' 03.2709''
15	37° 46' 12.4608''	28° 50' 38.6291''
16	37° 46' 03.8532''	28° 50' 43.5239''
17	37° 45' 55.1196''	28° 50' 46.0450''
18	37° 45' 45.2808''	28° 50' 54.7502''
19	37° 45' 36.4392''	28° 51' 02.1310''
20	37° 45' 28.4112''	28° 51' 11.2480''
21	37° 45' 19.0440''	28° 51' 25.1119''
22	37° 45' 24.4980''	28° 51' 55.5690''
23*	37 ° 47' 1.0356"	28 ° 47' 37.6815"
24*	37 ° 46' 31.8208"	28 ° 48' 29.6212"
25*	37 ° 46' 21.0153"	28 ° 49' 41.2116"

26*	37° 45' 23.7637"	28° 51' 18.0379"
27*	37° 45' 10.4044"	28° 51' 54.5612"
*Added WTGs to the initial design of the Project		
Geographic coordinates of added SPP unit		
SPP Unit 1	Latitude (N)	Longitude (E)
K1	37° 47' 37.0873"	28° 46' 54.4802"
K2	37° 47' 37.0785"	28° 46' 54.5188"
K3	37° 47' 35.9515"	28° 46' 54.9107"
K4	37° 47' 36.0288"	28° 46' 57.1293"
K5	37° 47' 34.8799"	28° 46' 57.0174"
K6	37° 47' 34.4573"	28° 46' 54.5902"
K7	37° 47' 27.2754"	28° 46' 57.3648"
K8	37° 47' 25.8656"	28° 46' 55.2079"
K9	37° 47' 26.1120"	28° 46' 48.5536"
K10	37° 47' 26.5015"	28° 46' 47.9080"
K11	37° 47' 29.2010"	28° 46' 48.8992"
K12	37° 47' 30.7026"	28° 46' 48.9580"
K13	37° 47' 36.2633"	28° 46' 50.2473"
SPP Unit 2	Latitude (N)	Longitude (E)
K1	37° 47' 16.3749"	28° 46' 57.3883"
K2	37° 47' 14.4754"	28° 46' 59.5621"
K3	37° 47' 13.9880"	28° 47' 0.1083"
K4	37° 47' 13.9821"	28° 46' 59.5380"
K5	37° 47' 12.9731"	28° 46' 59.5545"

K6	37° 47' 13.0703"	28° 46' 58.6604"
K7	37° 47' 13.3706"	28° 46' 57.8217"
K8	37° 47' 15.6175"	28° 46' 55.6201"
SPP Unit 3	Latitude (N)	Longitude (E)
K1	37° 47' 13.4879"	28° 47' 7.3821"
K2	37° 47' 12.6854"	28° 47' 7.4285"
K3	37° 47' 12.3416"	28° 47' 6.0076"
K4	37° 47' 9.0239"	28° 47' 7.4517"
K5	37° 47' 8.9534"	28° 47' 6.0722"
K6	37° 47' 9.2122"	28° 47' 5.1633"
K7	37° 47' 10.4561"	28° 47' 3.5712"
K8	37° 47' 10.4615"	28° 47' 4.0910"
K9	37° 47' 11.9905"	28° 47' 4.0660"
SPP Unit 4	Latitude (N)	Longitude (E)
K1	37° 47' 2.7914"	28° 47' 17.1254"
K2	37° 47' 2.5258"	28° 47' 17.6747"
K3	37° 47' 0.8932"	28° 47' 19.1418"
K4	37° 47' 0.9899"	28° 47' 19.4411"
K5	37° 46' 58.9743"	28° 47' 21.6171"
K6	37° 46' 58.6924"	28° 47' 21.5563"
K7	37° 46' 57.6006"	28° 47' 19.1971"
K8	37° 46' 57.6000"	28° 47' 18.0616"
K9	37° 46' 55.2844"	28° 47' 16.8121"
K10	37° 46' 55.2418"	28° 47' 16.5529"
K11	37° 46' 55.5362"	28° 47' 16.2601"
K12	37° 46' 57.7307"	28° 47' 15.2909"

K13	37° 47' 2.1043"	28° 47' 15.6121"
K14	37° 47' 2.1372"	28° 47' 15.5979"
K15	37° 47' 2.1530"	28° 47' 17.1358"
SPP Unit 5	Latitude (N)	Longitude (E)
K1	37° 47' 2.8377"	28° 47' 21.1665"
K2	37° 47' 0.5038"	28° 47' 23.3825"
K3	37° 47' 0.4346"	28° 47' 22.6395"
K4	37° 47' 0.5070"	28° 47' 22.0074"
K5	37° 47' 0.8303"	28° 47' 21.2069"
K6	37° 47' 1.8231"	28° 47' 19.7220"
SPP Unit 6	Latitude (N)	Longitude (E)
K1	37° 47' 0.7675"	28° 47' 20.2744"
K2	37° 47' 0.3899"	28° 47' 20.8333"
K3	37° 46' 59.8612"	28° 47' 22.1119"
K4	37° 46' 59.9178"	28° 47' 23.9389"
K5	37° 46' 59.0981"	28° 47' 24.7172"
K6	37° 46' 57.2438"	28° 47' 23.5094"
K7	37° 46' 58.3409"	28° 47' 22.4552"
K8	37° 46' 59.6063"	28° 47' 21.2393"

Electricity generated from both wind and solar components is supplied to Türkiye's national grid through the existing interconnection point.

For the initial project design, according to the relevant Environmental Impact Assessment Regulation for Denizli Wind Power Project, an Environmental Impact Assessment is not required. The official letters from Provincial Directorate of Environment and Urbanization confirming non-applicability of this regulation is available to DOE during validation process. For added wind turbines, the EIA Positive Decision was granted on 14/07/2020 by the Ministry of Environment/10/, Urbanization and Climate Change, General Directorate of EIA. For the additional solar unit to be integrated into the Denizli WPP, a "No EIA Required" decision was

issued by the Provincial Directorate of Environment, Urbanization and Climate Change on 19/01/2022/09/. Accordingly, the project continues to remain fully compliant with the applicable environmental regulations and permitting requirements.

VVB conducted interviews with site management and local authorities during the physical site visit.

EIA documents /09, 10/ provided and it is concluded that potential environmental and safety risks are limited and effectively mitigated through site design, operational protocols and compliance with national regulations. Accordingly, the project continues to remain fully compliant with the applicable environmental regulations and permitting requirements. All permits and certificates were provided within the scope of project boundary.

BM CERTIFICATION SIA reviewed all relevant documentation provided by the PP, including the updated generation license/12/, technical specifications/14/, layout drawings /13/ and provisional acceptance protocols /08/.

During the site visit, BM CERTIFICATION SIA observed the operational wind farm and the solar PV arrays, inverters, transformers and monitoring equipment.

Metering infrastructure remains unchanged. Electricity generation is measured through two main and two backup meters installed at the grid interface, both calibrated and compliant with regulatory requirements. Meter data are cross-referenced between EPIAŞ and TEİAŞ records to ensure accuracy and traceability.

Emission reduction calculations /03/ were reviewed and validated by BM CERTIFICATION SIA based on the revised baseline and project emission spreadsheets submitted by the PP. The applied methodology ACM0002 (Version 19) remains appropriate and valid, as the project activity continues to generate renewable electricity displacing fossil-fuel-based grid electricity in Türkiye.

The project activity remains classified as a large-scale renewable energy project and its eligibility under the applied methodology is unaffected by the design change.

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Audit history	Reviewed project registration documents and prior validation by “RINA” (version 4.0Aa, dated 17/12/2021) /21/. Verified that no previous validation findings remain unresolved. Cross-checked VCS Registry ID #1908 and project history in the Verra Registry: No outstanding issues.
Sectoral scope	The project activity falls under Sectoral Scope 1 – “Energy industries (renewable / non-renewable sources)”, as confirmed through the applicable registry classification and methodology applicability.

	This sectoral allocation was verified against the UNFCCC Standard: Applicability of Sectoral Scopes (Version 01.0) and the VCS Standard (Version 4.7). BM CERTIFICATION SIA confirms that the scope has been correctly identified and applied.
AFOLU project category, if applicable	Not applicable.
Project activity type	Verified as grid-connected renewable electricity generation using wind turbines and solar PV arrays. Confirmed under ACM0002 (Version 19). This is verified by site visit observations and interviews and review of PD.
General eligibility of the project to participate in the VCS Program	Checked VCS Standard (Version 4.7): project activity not excluded. Checked Project in Verra Registry (https://registry.verra.org/app/projectDetail/VCS/1908) Reviewed methodology ACM0002 (Version 19): eligible and appropriate. Confirmed that the hybrid configuration is part of the same licensed facility. Furthermore, the PP has described and justified how the project is eligible in Section 1.13 of the PD and this is reviewed and verified by BM CERTIFICATION SIA as above. Therefore, the project activity is “eligible”.
AFOLU project eligibility, if applicable	N/A
Transfer project eligibility, if applicable	N/A. The project activity was not transferred from another GHG program
Project design	Reviewed updated PD; verified integration of additional wind turbines and solar PV modules within existing wind farm infrastructure. Confirmed hybrid design does not exceed license limit (90 MWe) and aligns with revised license, which is a continuation of the previous license and EIA approval. The design conforms to VCS requirements.
Project ownership	Verified EMRA generation license and ownership declarations by Korda Enerji Üretim Pazarlama İthalat ve İhracat A.Ş. Cross-checked registry account holder and legal authorization to claim VCUs. Ownership clearly established.
Project start date	Unchanged from original validation: 13-September-2019 (provisional acceptance protocols of initial set of wind turbines). Compliant with VCS definition of start date.

Project crediting period	Verified 10-years renewable periods beginning 13-September-2019. Current DC applies to CP1 (2019–2029). Consistent with VCS rules and registry record.
Project scale	Large-scale (> 15 MW). Total capacity 104.5629 MWm/ 90 MWe.
Likelihood of achieving estimated GHG emission reduction or removals	Generation forecasts and baseline calculations using ACM0002 (Version 19) have been cross-checked against wind-feasibility report /11/. P75 estimates are conservative and reasonable. SPP feasibility is provided to VVB /19/.
Technologies and measures implemented by the project activity or activities	Siemens SWT-3.4-108 and Nordex N133 of the turbines /14/ and Schmid Pekintaş Solar modules SPE 550 Half Cut Bifacial. Reviewed installation photos. Technologies are consistent with the PD and methodology requirements.
Implementation schedule of the project activity or activities	Reviewed construction timeline and commissioning plans for PV component. The solar unit was partially commissioned on 23/01/2025 and 04/09/2025. A capacity of 4.5188 MWm was commissioned on 23/01/2025, while the remaining 1.2441 MWm was commissioned on 04/09/2025. Additional turbines T23-T6 have been commissioned on 22/08/2025, T27 turbine and solar unit has been commissioned on 04/09/2025. The implementation status is realistic and aligned with design change.
Project location	Confirmed through site visit and KMZ file: The project is located in Denizli Province, Babadağ District, Demirli Village. Some parts of the plant are located in Aydın Province, Karacasu District. Moreover, the coordinates of the project activity are given in section 3.1 of this report. The location is accurate and consistent across all documents.
Conditions prior to project initiation	Verified baseline scenario as grid electricity from fossil fuel sources. Reviewed pre-project generation mix and grid emission factors. Baseline correctly defined.
Project compliance with applicable laws, statutes and other regulatory frameworks	Reviewed licenses, permits, EIA approval. All valid and in force, hence the project activity is compliant.
Double counting and participation under other GHG programs	“Double counting” was assessed by BM CERTIFICATION SIA, through review of the following databases: - the CDM Project Registry (https://cdm.unfccc.int/Projects/projsearch.html), - the Gold Standard Registry (https://registry.goldstandard.org/projects?q=&page=1), - the GCC Registry (https://projects.globalcarboncouncil.com/pages/submitted_projects),

	- the ICR Registry (https://iceland.itmoregistry.net/Public/Project), - the Biocarbon Registry (https://biocarbonregistry.com/en/), - the I-Rec Registry (https://fotonplatform.com/santraller/), - the Cercarbono Registry (https://www.ecoregistry.io/projects-list/cercarbono-co2) and - the GCR Registry (https://gcr.globalcarbon.net/Public/Project) The project activity is not listed on any of these. BM CERTIFICATION SIA hence confirm that, to the best of its knowledge, no other VER or equivalent carbon credits are being issued for this project. This conclusion satisfies the requirements of Article “3.23 (Double Counting)” and “3.24 (Participation under Other GHG Programs)” in the VCS Standard (Version 4.7)
No double claiming with emissions trading programs or binding emission limits	Türkiye has no mandatory ETS covering renewable electricity projects. No double claiming risk.
No double claiming with other forms of environmental credit	The PP confirmed no applications under REC or green certificate schemes.
Supply chain (Scope 3) emissions double claiming	The PP is not a seller of renewable energy products with embodied carbon claims; no Scope 3 reporting relevant.
Sustainable development contributions	BM CERTIFICATION SIA reviewed the supporting documentation provided in the revised PD and accompanying evidence related to the project’s expected contributions to the United Nations Sustainable Development Goals (SDGs). The assessment confirmed that the design change is consistent with the project activity’s environmental and socio-economic objectives and continues to contribute positively to sustainable development. <u>SDG 13 (Climate Action):</u> The hybrid project activity will continue to reduce greenhouse gas emissions by displacing grid electricity generated from fossil fuel sources. Based on the revised emission-reduction calculations /03/, the project activity is expected to prevent approximately 151,382 tCO₂e annually. BM CERTIFICATION SIA validated that the estimation method and baseline parameters

	applied in the PD are consistent with methodology ACM0002 (Version 19) and the VCS Standard requirements. <u>SDG 7 (Affordable and Clean Energy):</u> By adding solar PV capacity, the project activity increases the reliability and diversity of renewable power generation within the same grid-injection limit. The combined hybrid configuration is expected to supply approximately 360,000 MWh/year of clean electricity per year to the Turkish national grid. Technical documentation, single-line diagrams and licensing evidence confirm that the integration complies with EMRA and TEİAŞ regulations. <u>SDG 8 (Decent Work and Economic Growth):</u> The design change contributes to sustained local employment through construction, assembly and operation of the new PV system and additional turbines. Interviews during the site visit confirmed that the PP intends to use primarily local contractors for installation and maintenance, in line with the project's ongoing social commitments. The project activity contributes positively to sustainable development. This was verified through interviews of the PP-Representative during the physical on-site audit. BM CERTIFICATION SIA reviewed the EIA documents/09,10/, updated generation license /12/ and stakeholder interviews and verified that the design change does not introduce new adverse environmental or social impacts.
Additional information relevant to the project	Leakage not applicable for grid-connected renewables.

3.2 Safeguards and Stakeholder Engagement

BM CERTIFICATION SIA confirm that the project activity was assessed and found to conform with the requirements of the VCS Standard (Version 4.7), including procedures for stakeholder identification, consultation, ongoing communication, grievance handling and environmental and social safeguard management.

Mitigation measure No. 1 relates to dust management during construction activities. The selected mitigation measure consists of regularly watering the roads and construction site to minimize dust formation. The chosen monitoring parameter is the amount of dust emissions. The current situation confirms that roads and the construction site are watered regularly, although dust levels would remain compliant with applicable regulations even in the absence of watering activities. The baseline scenario for the parameter is defined as dust emissions generated naturally by wind. The future target is to maintain the current mitigation practice throughout the

project activity. Monitoring will be conducted through interviews with local residents, to be carried out once during the first verification by the Project Proponent.

Mitigation measure No. 2 addresses water quality and quantity management. Wastewater generated during the project activity is stored in a septic tank and transferred to a wastewater treatment plant by sewage truck. The monitored parameter is the amount of wastewater prevented from being discharged into the environment. The current situation confirms that no wastewater is discharged within the project area, which is also consistent with the baseline scenario. The future target is to maintain the current practice without environmental discharge. Monitoring is conducted through records of wastewater transfer by sewage truck during each verification period by an assigned technician designated by the Plant Manager or by the assigned carbon consultant.

Mitigation measure No. 3 relates to noise management. Construction activities are carried out in accordance with the limit values specified under the applicable regulations. The monitored parameter is the noise level around the project site. The current situation demonstrates that noise levels do not exceed the regulatory thresholds. The baseline scenario is defined as the existing environmental noise level in the surrounding area. The future target is to maintain compliance with the current situation. Monitoring will be performed through interviews with local residents once during the first verification by the Project Proponent.

Mitigation measure No. 4 concerns the status of roads affected by construction activities. Any roads damaged during construction will be repaired once the construction period is completed. The monitored parameter is the impact of the project activity on roads. The current situation reflects the condition of the roads prior to construction activities, and the baseline scenario is defined as the continuation of this condition. The future target is to preserve the current road status through necessary repairs and maintenance. Monitoring will be conducted through interviews with local residents once during the first verification by an assigned technician designated by the Plant Manager or by the assigned carbon consultant.

Mitigation measure No. 5 addresses biodiversity protection. The measures include painting turbines in light colours, applying contrasting colours to turbine blade tips, installing lights on turbines, and clearing vegetation within approximately 100 m diameter areas around turbine locations, preferably covering these areas with gravel. In addition, four endemic plant species identified within the project area — *Centaurea cadmea* Boiss., *Picris olympica* Boiss., *Draba bruniifolia* Stev. subsp. *heterocoma* (Fenzl) Coode & *nana* (Stapf) Schulz, and *Muscari aucheri* (Boiss.) Baker — will be protected through appropriate soil stripping and restoration practices whenever encountered. The monitored parameter is the number of bird strikes on turbines and any adverse impacts on the natural habitat. The current and baseline situations are considered not applicable, while the future target is zero adverse impact. Monitoring will be conducted during verification site visits through reports, photographs or videos provided by the Designated Operational Entity (DOE) and the Project Proponent. Monitoring will take place once during the

verification site visit and will be carried out by an assigned technician designated by the Plant Manager or by the assigned carbon consultant.

For the initial project design, according to the relevant Environmental Impact Assessment Regulation for Denizli Wind Power Project, an Environmental Impact Assessment is not required. The official letters from Provincial Directorate of Environment and Urbanization confirming non-applicability of this regulation is available to DOE during validation process. For added wind turbines, the EIA Positive Decision was granted on 14/07/2020 by the Ministry of Environment /10/, Urbanization and Climate Change, General Directorate of EIA. For the additional solar unit to be integrated into the Denizli WPP, a “No EIA Required” decision was issued by the Provincial Directorate of Environment, Urbanization and Climate Change on 19/01/2022 /09/. Accordingly, the project continues to remain fully compliant with the applicable environmental regulations and permitting requirements.

VVB conducted interviews with site management and local authorities during the physical site visit.

EIA documents provided and it is concluded that potential environmental and safety risks are limited and effectively mitigated through site design, operational protocols and compliance with national regulations. Accordingly, no negative effects on endemic flora and fauna are anticipated.

Mitigation measure No. 6 concerns water quality and quantity management associated with PV panel cleaning activities. No routine water-based cleaning is implemented, as natural rainfall is primarily relied upon for module cleaning in accordance with common practice for PV installations in Türkiye. Additional cleaning is only carried out when necessary, such as during exceptional dust accumulation events, using minimal amounts of water. The monitored parameter is water consumption for panel washing, if applicable. The current situation confirms that there is no regular or scheduled water consumption associated with panel cleaning, and any occasional cleaning activities do not constitute material water use affecting local water resources. The baseline scenario similarly assumes no routine water consumption for panel washing. The future target is to maintain the current practice of avoiding routine water use and continuing only minimal, as-needed cleaning activities. Monitoring will be conducted through operation and maintenance records whenever cleaning activities occur, and responsibility lies with site O&M personnel or the plant operator.

3.2.1 Stakeholder Engagement and Consultation

3.2.1.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
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Stakeholder identification	The stakeholders listed in the registered PD /20/ have remained the same since the project activity's original validation. During the physical site visit on 09/04/2026, BM CERTIFICATION SIA interviewed sampled stakeholders representing each role listed in the PD.
Legal or customary tenure/access rights	Reviewed EMRA generation license and forestry permits. Land registry records confirm that the site is government-owned forestry land leased to the PP.
Stakeholder diversity and changes over time	Stakeholders include local residents (mainly farmers and service workers), local authorities and project staff. No significant change in stakeholder composition or diversity was observed since the original validation.
Expected changes in well-being	Interviewed the village head and local residents during the site visit. Stakeholder statements and municipal feedback confirm continued positive perception of the project. The design change (wind and solar addition) is expected to maintain local well-being through temporary employment; no adverse effects were identified.
Location of stakeholders	Reviewed KMZ data. Stakeholders reside in two villages around the plant, Ataköy and Karacasu. Still, the project site is on top of a hill and away from residential area. No Indigenous Peoples or customary land users identified; affected stakeholders are local communities and employees.
Location of resources	Reviewed land-use and forestry maps, public consultation announcements and grievance mechanism records. No water resources used; forestry permits in place; consultations held locally and in Turkish.

3.2.1.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder engagement process	Reviewed records of the stakeholder consultation meetings conducted prior to implementation and again prior to the design change, including invitations, attendance sheets, photos, agendas and face to face communications. Conducted interviews with Ataköy and Karacasu Villages during the physical site visit. Meeting minutes showing that representatives of all stakeholder groups were present; documentation of discussions on project design, risks, costs and benefits, workers' rights, copies of the presentation explaining the VCS validation/verification process and the role of BM CERTIFICATION SIA

	The consultation was inclusive and in line with national EIA procedures. All required topics were covered and stakeholder consent was obtained without objection.
Consultation outcome	Ataköy Village Head and Karacasu stakeholders confirm that the community has no complaints; showing that no design modification was required.
Ongoing communication	Grievance register (no entries) is available and stakeholders declare they can reach out to PP when needed. Signed Declaration from Ataköy Village Mukhtar for Grievance Mechanism dated 09/04/2026 is provided to VVB /15/.
Stakeholder input	Interviewed local residents, site workers and the Village Head to confirm whether feedback mechanisms are effective and whether concerns have been addressed. Stakeholders expressed continued support and no unresolved concerns.

3.2.1.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Obtaining consent	The project activity obtained free, prior and informed consent from all affected land users. Forest permits have been provided to VVB.
Outcome of FPIC discussion	FPIC has been secured through voluntary agreement and continued community acceptance. No unresolved property conflicts exist.

3.2.1.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Development process	Grievance logbook seen by PP. The PP has developed a culturally appropriate, accessible and documented grievance mechanism covering all VCS requirements for receiving, hearing and resolving complaints. The procedure is well communicated and publicly available. Signed Declaration from Ataköy Village Mukhtar for Grievance Mechanism dated 09/04/2026 is provided to VVB.
Grievance redress procedure	The grievance redress mechanism is functioning, accessible to all stakeholders and effective in preventing and resolving conflicts within reasonable time frames. No open cases exist and no evidence of unresolved disputes was found.

3.2.1.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
No public comments were received during the 30-day public comment period.	Not applicable	The project activity complied fully with the VCS public-comment requirements. No further action was required.
No additional comments were received after the public comment period.	Not applicable	The project activity complied fully with the VCS public-comment requirements. No further action was required.

3.2.2 Risks to Local Stakeholders and the Environment

3.2.2.1 Management Experience

BM CERTIFICATION SIA reviewed the organizational structure and management profiles provided in the revised PD and supporting documentation submitted by the PP. Interviews were conducted with the site manager during the physical site visit.

The project management team has substantial technical and managerial experience in developing and operating grid-connected renewable-energy projects in Türkiye.

3.2.2.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human-induced risks to stakeholders' wellbeing	For the initial project design, according to the relevant Environmental Impact Assessment Regulation for Denizli Wind Power Project, an Environmental Impact Assessment is not required. The official letters from Provincial Directorate of Environment and Urbanization confirming non-applicability of this regulation is available to DOE during validation process. For added wind turbines, the EIA Positive Decision was granted on 14/07/2020 by the Ministry of Environment, Urbanization and Climate Change, General Directorate of EIA.

	For the additional solar unit to be integrated into the Denizli WPP, a “No EIA Required” decision was issued by the Provincial Directorate of Environment, Urbanization and Climate Change on 19/01/2022. Accordingly, the project continues to remain fully compliant with the applicable environmental regulations and permitting requirements. VVB conducted interviews with site management and local authorities during the physical site visit. EIA documents provided and it is concluded that potential environmental and safety risks are limited and effectively mitigated through site design, operational protocols and compliance with national regulations.
Risks to stakeholder participation	As confirmed by stakeholders during site visit, stakeholder participation remains open and inclusive.
Working conditions	As observed during site visit, the PP maintains safe and healthy working conditions consistent with national requirements.
Safety of women and girls	No risks identified; mitigation measures appropriate and preventive.
Safety of minority and marginalized groups, including children	No adverse impacts identified; controls in place protect children and vulnerable persons.
Pollutants (air, noise, discharges to water, generation of waste, release of hazardous materials, and chemical pesticides and fertilizers)	Reviewed EIA reports, annual environmental monitoring data and waste-management records; inspected site waste-storage areas. Noise and shadow-flicker levels below legal thresholds; no liquid discharges; solid waste segregated and disposed through licensed operators; lubricants and transformer oils stored in sealed, banded containers. Pollution-prevention and waste-handling practices comply with national environmental regulations and VCS requirements. No risk identified.

3.2.3 Respect for Human Rights and Equity

3.2.3.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	Reviewed the PP's HR Policy, Code of Ethics and Equal Opportunity Statement. Interviewed site manager and O&M staff during the physical site visit. Company policies explicitly prohibit discrimination based on gender, religion, ethnicity or political view and are communicated to all employees through orientation training. No complaints or incidents were found in the internal HR records.
Sexual harassment	Clear reporting and confidential response mechanisms exist; no cases reported or observed.

Equal pay for equal work	No discrepancies identified; remuneration practices comply with Turkish Labour Law and VCS § 3.19.14.
Gender equity in labor and work	Gender equity objectives are integrated and demonstrated in practice.
Forced labor	No indications of forced labor.
Child labor	No child labor risks identified.
Human trafficking	No risks or violations detected.

3.2.3.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Respect for human rights in project design and implementation	VVB checked the compliance with Turkish Labour Law No. 4857 and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Interviews were conducted with the site manager, workers and local officials during the physical site visit. The PP respects all rights set out in the International Bill of Human Rights and applies the ILO Declaration principles within its HR and supplier-management systems. No violations, complaints, or pending legal actions identified.
Rights of Indigenous Peoples (IPs), Local Communities (LCs) and customary rights holders	No indigenous or tribal communities exist in or near the project boundary.
Freedom of association and collective bargaining	Reviewed HR manual and union-membership policy; interviewed employees on freedom to join professional associations. Employees enjoy full freedom of association consistent with ILO Convention 87.
Grievance and access to remedy	Effective remedy and complaint mechanisms are in place; human-rights protection measures adequate.

3.2.3.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Presence of Indigenous Peoples (IPs), Local Communities (LCs) and customary rights holders	No Indigenous Peoples.
Rights recognition and protection of Indigenous and customary groups	N/A
Cultural heritage sites and artifacts	No risk to tangible or intangible cultural heritage identified; the project activity complies with UNESCO heritage protection principles.

3.2.3.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
Recognition and respect of property rights	Reviewed EMRA generation license, forestry authorizations and expropriation records; interviewed the stakeholders of Ataköy and Karacasu and local landholders during the physical site visit. All project lands are lawfully leased or expropriated with prior consent and compensation in accordance with Turkish Expropriation Law No. 2942.
Encroachment or displacement	No physical or economic displacement has occurred or is anticipated.
Benefit-sharing and local engagement	No property-rights impacts required a formal compensation or benefit-sharing agreement.

3.2.3.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Process used to design the benefit sharing plan	No property-rights impacts required a formal compensation or benefit-sharing agreement.
Summary of the benefit sharing plan	N/A
Approval and dissemination of benefit sharing plan	N/A

3.2.4 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	For the initial project design, according to the relevant Environmental Impact Assessment Regulation for Denizli Wind Power Project, an Environmental Impact Assessment is not required. The official letters from Provincial Directorate of Environment and Urbanization confirming non-applicability of this regulation is available to DOE during validation process. For added wind turbines, the EIA Positive Decision was granted on 14/07/2020 by the Ministry of Environment, Urbanization and Climate Change, General Directorate of EIA. For the additional solar unit to be integrated into the Denizli WPP, a “No EIA Required” decision was issued by the Provincial Directorate of Environment, Urbanization and Climate Change on 19/01/2022. Accordingly, the project continues to remain fully compliant with the applicable environmental regulations and permitting requirements. VVB conducted interviews with site management and local authorities during the physical site visit. EIA documents provided and it is concluded that potential environmental and safety risks are limited and effectively mitigated through site design, operational protocols and compliance with national regulations.

Soil degradation and soil erosion	Conducted on-site inspection of turbine pads, PV array foundations and access roads. Topsoil was removed, stored and reinstated according to the EIA requirements. No visible erosion or land instability observed during the site visit.
Water consumption and stress	The project's water use is minimal and does not cause local water stress or impact hydrological functions.

3.2.4.1 Rare, Threatened, and Endangered species

Risk identified	Evidence gathering activities, evidence checked, and assessment conclusion
Species and habitat	As per EIA documentation, the project activity is not located in or adjacent to habitats of rare, threatened, or endangered species and no negative impact is expected. Periodic ecological monitoring under EMRA's environmental permit continues to ensure compliance.
Areas needed for habitat connectivity	As per EIA documentation, the project activity does not interfere with habitat connectivity or wildlife movement pathways.

3.2.4.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable – no species introduction involved	The project activity does not include any introduction of plant or animal species.

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
None identified in or around the project area	No invasive species are present within the project footprint. Natural regeneration of native grasses is observed in temporarily disturbed areas.

Evidence gathering activities, evidence checked, and assessment conclusion	
Invasive species	The risk of invasive species introduction or spread is negligible. The project activity is located in a previously disturbed energy-use zone and all ground-cover regeneration is natural and native.

3.2.4.3 Ecosystem conversion

Risks Identified	Evidence gathering activities and evidence checked
Ecosystem conversion	As per EIA documents provided to VVB and site visit observations the project activity does not result in ecosystem conversion. Construction was limited to already-disturbed or low-biodiversity lands and natural steppe vegetation regenerates around the infrastructure. The project activity therefore conforms with the VCS Standard, ensuring no negative impacts on natural ecosystems.

3.3 Application of Methodology

3.3.1 Title and Reference

The project activity applies the approved CDM consolidated methodology “ACM0002: Grid-connected electricity generation from renewable sources (Version 17.0)”

The applied methodology is appropriate because the project activity involves grid-connected generation of electricity from renewable sources and does not involve switching of fuels, off-grid components, or energy efficiency improvements.

This Design Change Validation concerns “ACM0002: Grid-connected electricity generation from renewable sources (Version 19)” with the hybridization of an existing wind power plant through the addition of auxiliary solar photovoltaic (PV) units and additional turbines. The hybrid system continues to operate under a single grid interconnection point and within the revised licensed generation capacity.

In addition to the main methodology, the following approved tools and methodological references have been applied:

- “Tool to calculate the emission factor for an electricity system” (Version 06.0)
- “Tool for the demonstration and assessment of additionality” (Version 07.0.0)
- “Methodological Tool: Investment analysis” (Version 14.0)
- “Methodological Tool: Common practice” (Version 03.1)
- “Methodological Tool to determine the remaining lifetime of equipment” (01.0)

All methodology and tool versions applied were valid and effective at the time of validation, as confirmed through the UNFCCC CDM Methodology Database and the Verra VCS Methodology Library.

BM CERTIFICATION SIA confirm that the applied methodology ACM0002 (Version 19) and associated tools are valid, applicable and correctly implemented for the project activity's hybrid configuration (wind + solar).

3.3.2 Applicability

Methodology ID	Applicability condition	Assessment and conclusion
ACM0002 (Version 19)	This methodology is applicable to grid-connected renewable energy power generation project activities that: (a) Install a Greenfield power plant; (b) Involve a capacity addition to (an) existing plant(s); (c) Involve a retrofit of (an) existing operating plants/units; (d) Involve a rehabilitation of (an) existing plant(s)/unit(s); or (e) Involve a replacement of (an) existing plant(s)/unit(s).	The project activity consists of installation of Greenfield power plant at a site where no renewable power plant was operated prior to the implementation of the project activity. Thus, it meets the said applicability condition. Validated via on site visit and document review by VVB.
	The project activity may include renewable energy power plant/unit of one of the following types: hydro power plant/unit with or without reservoir, wind power plant/unit, geothermal power plant/unit, solar power plant/unit, wave power plant/unit or tidal power plant/unit.	The project activity is the installation of 27 wind turbine generators (WTVCS) and a solar unit. Hence, it meets this criterion. Validated via on site visit and document review by VVB.
	In the case of capacity additions, retrofits, rehabilitations or replacements (except for wind, solar, wave or tidal power capacity addition projects the existing plant/unit started commercial operation prior to the start of a minimum historical reference period of five years, used for the calculation of baseline emissions and defined in the baseline emission section, and no capacity expansion, retrofit, or rehabilitation of the plant/unit has been	The project activity only involves capacity addition of solar and wind. Hence, this criterion is not applicable to the project activity. Validated via on site visit and document review by VVB.

	undertaken between the start of this minimum historical reference period and the implementation of the project activity.	
	In case of hydro power plants, one of the following conditions shall apply:(a) The project activity is implemented in existing single or multiple reservoirs, with no change in the volume of any of the reservoirs; or (b) The project activity is implemented in existing single or multiple reservoirs, where the volume of the reservoir(s) is increased and the power density calculated using equation (3), is greater than 4 W/m²; or (c) The project activity results in new single or multiple reservoirs and the power density, calculated using equation (3), is greater than 4 W/m²; or (d) The project activity is an integrated hydro power project involving multiple reservoirs, where the power density for any of the reservoirs, calculated using equation (3), is lower than or equal to 4 W/m², all of the following conditions shall apply: (i) The power density calculated using the total installed capacity of the integrated project, as per equation (4), is greater than 4 W/m²; (ii) Water flow between reservoirs is not used by any other hydropower unit which is not a part of the project activity; (iii) Installed capacity of the power plant(s) with power density lower than or equal to 4 W/m² shall be:	The project activity is not a hydro power plant. Hence, this criterion is not applicable to the project activity.

	a. Lower than or equal to 15 MW; and b. Less than 10 per cent of the total installed capacity of integrated hydro power project.	
	In the case of integrated hydro power projects, project proponent shall: (a) Demonstrate that water flow from upstream power plants/units spill directly to the downstream reservoir and that collectively constitute to the generation capacity of the integrated hydro power project; or (b) Provide an analysis of the water balance covering the water fed to power units, with all possible combinations of reservoirs and without the construction of reservoirs. The purpose of water balance is to demonstrate the requirement of specific combination of reservoirs constructed under CDM project activity for the optimization of power output. This demonstration has to be carried out in the specific scenario of water availability in different seasons to optimize the water flow at the inlet of power units. Therefore this water balance will take into account seasonal flows from river, tributaries (if any), and rainfall for minimum five years prior to implementation of CDM project activity.	The project activity is not a hydro power plant. Hence, this criterion is not applicable to the project activity.
	The methodology is not applicable to: (a) Project activities that involve switching from fossil fuels to renewable energy sources at the site of the project activity, since in this case the baseline may be the continued use of fossil fuels at the site;	Project activity does not involve: Switching from fossil fuels to renewable energy sources at the site of the project activity.

	(b) Biomass fired power plants/units	• Biomass fired plants. Hence this criterion is not applicable.
	In the case of retrofits, rehabilitations, replacements, or capacity additions, this methodology is only applicable if the most plausible baseline scenario, as a result of the identification of baseline scenario, is “the continuation of the current situation, i.e. to use the power generation equipment that was already in use prior to the implementation of the project activity and undertaking business as usual maintenance”.	The project is not a retrofit, rehabilitations, replacements or capacity addition; hence, this criterion is not applicable to the project activity
	In addition, the applicability conditions included in the tools referred to above apply.	Applicability conditions of the applied tool are justified.

3.3.3 Project Boundary

The project boundary defines the physical, geographical and operational extent of the project activity, as well as the GHG sources, sinks and reservoirs considered in both the project and baseline scenarios.

Under ACM0002 (Version 19), the boundary includes all anthropogenic GHG emissions under the control of the PP that are significant and reasonably attributable to electricity generation and delivery to the grid.

BM CERTIFICATION SIA reviewed the PD, MP, single-line diagrams, EIA license, generation license and commissioning reports to confirm that all facilities and emission sources were correctly included within the boundary including the added turbines and SPP.

During the physical site visit, BM CERTIFICATION SIA inspected the wind turbines, PV arrays, inverters, transformers, internal cabling network and the Tavas TM and Denizli Batı 380 TM , which constitutes the grid connection point.

Source		Gas	Included?	Assessment and conclusion
Baseline	CO ₂ emissions from	CO ₂	Yes	This is the only significant source of GHG emissions in the baseline scenario. Electricity that would have been generated by fossil fuel-based grid-connected power plants (primarily natural gas and coal in Türkiye) is displaced by renewable electricity from

Source		Gas	Included?	Assessment and conclusion
	electricity generation			the project. BM CERTIFICATION SIA verified the baseline emission factor calculated using the “Tool to calculate the emission factor for an electricity system” (Version 7.0) based on EPIAŞ data.
		CH ₄	No	Methane emissions from grid electricity generation are negligible under ACM0002.
		N ₂ O	No	Nitrous oxide emissions from grid electricity generation are negligible under ACM0002.
		Other	No	No other gases are significant in the baseline scenario.
	Source 2	CO ₂	N/A	Not applicable; there are no additional baseline sources beyond grid electricity generation.
		CH ₄	N/A	Not applicable; there are no additional baseline sources beyond grid electricity generation.
		N ₂ O	N/A	Not applicable; there are no additional baseline sources beyond grid electricity generation.
		Other	N/A	Not applicable; there are no additional baseline sources beyond grid electricity generation.
Project	Source 1: Electricity generation from wind turbines and solar PV units	CO ₂	No	The project activity uses renewable sources (wind and solar PV), which do not emit CO ₂ during operation. Verified through equipment specifications and on-site observation.
		CH ₄	No	No CH ₄ -emitting processes are present.
		N ₂ O	No	No N ₂ O-emitting processes are present.
		Other	No	No other greenhouse gases are emitted during normal operation.
	Source 2: Auxiliary and maintenance activities (e.g., internal electricity use, service vehicles)	CO ₂	No	Auxiliary power consumption is < 1 % of annual generation and negligible per ACM0002. Service vehicle use is not under the PP’s operational control and is excluded.
		CH ₄	No	N/A
		N ₂ O	No	N/A

Source	Gas	Included?	Assessment and conclusion
	Other	No	N/A

BM CERTIFICATION SIA confirm that the project boundary has been correctly defined and encompasses all relevant sources and systems under the PP's control.

3.3.4 Baseline Scenario

Under ACM0002 (Version 19), the baseline scenario for grid-connected renewable energy projects is defined as:

“The electricity that would have been generated by the operation of grid-connected power plants and the addition of new generation sources in the absence of the project activity.”

Accordingly, the baseline for this project activity is the continued generation of electricity by fossil-fuel-based power plants supplying the Turkish national grid, which relies primarily on natural gas and coal. The baseline scenario therefore represents the electricity generation mix that would have continued to operate had the renewable project not been implemented.

BM CERTIFICATION SIA assessed the baseline identification process and verified that it complies with the requirements of ACM0002 (Version 19), the Tool for the Demonstration and Assessment of Additionality (Version 7.0.0) and the Tool to Calculate the Emission Factor for an Electricity System (Version 7.0).

By country expertise and investigation of TEIAS sources, VVB concludes that fossil-fuel generation is dominant in Turkish grid. The combination of aforementioned trends indicates that if Denizli WPP would not be built, power from a new grid-connected thermal plant would be the most likely scenario.

3.3.5 Additionality

The project activity applies the project method for demonstrating additionality as prescribed in ACM0002 (Version 19) in conjunction with the “Tool for the Demonstration and Assessment of Additionality” (Version 7.0.0).

This tool follows a structured, step-wise approach including:

- Step 1 – Identification of Alternatives to the Project Activity
- Step 2 – Investment Analysis
- Step 3 – Barrier Analysis
- Step 4 – Common Practice Analysis
- Step 5 – Impact of the CDM/VCS Registration

VVB reviewed the national electricity laws (Law No. 5346 on Renewable Energy, Law No. 6446 on Electricity Market) and EMRA generation license. VVB confirmed that project implementation is voluntary and not mandated by law.

Some important dates for the project activity are validated as below:

Date (DD/MM/YYYY)	Activity
15/07/2011	"EIA is not required" certificate
18/08/2011	Issuance of the License
20/10/2014	Site Related Wind Potential Analysis and Energy Yield Assessment Report at the Babadağ Site
19/03/2018	EPC Agreement
19/03/2018	Turbine Maintenance Agreement
23/03/2018	Construction Start Date (Notice to Proceed for Execution of Works)
03/08/2018	Loan Agreement
10/08/2018	Facility Supplement Agreement
13/09/2019	Commissioning date of the turbines, start date of the operation and start date of the first crediting period
13/09/2019	Start of the first monitoring period
14/07/2020	" EIA Positive" decision regarding capacity addition (Addition of 5 turbines to Denizli WPP)
19/01/2022	"EIA is not required" certificate regarding addition of solar unit
31/05/2022	End of the first monitoring period
01/06/2022	Start date of the second monitoring period
31/12/2023	End date of the second monitoring period
01/01/2024	Start date of the third monitoring period
03/04/2024	Investment Decision Date for solar capacity addition (EPC Agreement)
23/07/2024	Investment Decision Date for wind capacity addition (EPC Agreement)
31/12/2024	End date of the third monitoring period
01/01/2025	Start date of the fourth monitoring period
23/01/2025	Commissioning date of SPP unit 1-2-3-5-6

22/08/2025	Commissioning date of additional wind turbines (T23-T26)
04/09/2025	Commissioning date of additional wind turbines (T27)
04/09/2025	Commissioning date of additional solar unit
31/12/2025	End date of the fourth monitoring period
12/09/2029	End of the first crediting period

VVB has checked the financial calculations /05/. Equity IRR is selected as the financial indicator. The project's IRR ($\approx 9.37\%$) is below the benchmark of 12.72%, indicating that, without carbon revenue, the project activity would not be financially attractive.

For selection of benchmark, since Turkey is not listed in the Tool 27's Appendix, similar countries having same credit rates around 19.03.2018 (investment decision taken date) are examined. As the Moody's credit ratings for two countries are similar, Georgia's default value for equity IRR 12.72 is selected by PO and approved by VVB.

Also, Related details about sensitivity Analysis with IRR rate was indicated in below table. Financial parameters are transparent, current and appropriately justified.

Since there is a project design deviation, IRR analysis has been reassessed for the added capacity. IRR analysis has been reassessed in terms of added capacity, additional capital expenses, operational cost. Revised IRR inputs related to capacity addition has been given below.

Item	Value	Units	Source	Date of The Source Document
Installed Power	90	MWe	Official Generation License of the Project	18/08/2011
Technical lifetime of the project	25	years	Tool to determine the remaining lifetime of equipment (v.1)	16/10/2009
Gross Generation	360,000	MWh	Official Generation License of the Project	18/08/2011
Electricity tariff	55.5	EUR Per MWh	Feed-in-tariff	18/05/2005
Investment Cost (Additional Solar Unit)	4.6	MI EUR	EPC Agreement	03/04/2024

Investment Cost (Additional 5 Wind Turbines)	17.75	MI EUR	EPC Agreement	23/07/2024
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IRR value for project activity (after tax) (after project design deviation) is 9.37 %. The Benchmark is 12.72%, it does clearly exceed the resulting equity IRRs, thus rendering the project activity economically unattractive.

PLF= Annual Gen. / Installed Cap. * (working hours)
=186,100/66*8760
=0.321 (before design deviation)

PLF= Annual Gen. / Installed Cap. * (working hours)
=360,000/90*8760
= 0.457 (after design deviation)

Sensitivity analysis for the Equity IRR without carbon revenue for the project (Benchmark: 12.72%)

After DC:

Parameter	Electricity Price			Investment Cost			Energy Yield			Operating Cost		
Variance	-10%	0%	10%	-10%	0%	10%	-10%	0%	10%	-10%	0%	10%
IRR	6.70 %	9.37 %	12.08 %	10.08 %	9.37 %	8.72 %	6.70 %	9.37 %	12.08 %	10.97 %	9.37 %	7.62 %

IRR Breaching Values for Denizli WPP after design deviation

Parameter	IRR Breaching Values	IRR Result
Power Price	12.35%	12.73%
Investment Cost	-40%	12.73%
Energy Yield	12.38%	12.74%

Operating Cost	22.35%	12.73%
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The IRR breaching analysis demonstrates that achieving the benchmark would require highly unrealistic assumptions, including significant increases in electricity prices, substantial reductions in both investment and operating costs, and overly optimistic energy generation levels.

Data sources are transparent, nationally recognized and reasonable. No material errors or inconsistencies were detected.

Barrier Analysis has not been selected for the project activity additionality.

Common Practice Analysis result /07/ was confirmed that project is not common practice with in the scope of “ $F=1-N_{diff}/N_{all}$ $F=1-(24/28)$ ” calculation and F value found as correctly as “0.14” which is not greater than “2” and $N_{all}-N_{diff}$ value equals to “2” which is not greater than “3” as in line with Common Practice analysis Tool (version 03.1).

BM CERTIFICATION SIA confirm that the PP has correctly applied the additionality demonstration procedure in accordance with ACM0002 (Version 19) and the Additionality Tool (Version 7.0.0).

All assumptions and data used are justified, supported by credible evidence and reasonably represent the national and sectoral context.

Therefore, the project activity is additional within the meaning of Article 3.14 of the VCS Standard (Version 4.7) and Article 18.5 of the VCS Validation and Verification Manual and the demonstration of additionality is validated and justified.

3.3.6 Quantification of GHG Emission Reductions and Carbon Dioxide Removals

The quantification of baseline, project and leakage emissions were carried out in accordance with ACM0002 (Version 19) “Grid-connected electricity generation from renewable sources”, in combination with the following approved tool “Tool to calculate the emission factor for an electricity system (Version 6.0)”.

The project activity displaces grid-supplied electricity that would otherwise have been generated by fossil-fuel-based power plants connected to the Turkish national grid.

The total net GHG emission reductions are quantified as:

$$ER = BE - PE - LE$$

where:

BE = Baseline Emissions,

PE = Project Emissions,

LE = Leakage Emissions

Calculated using the combined margin (CM) emission factor for the Turkish grid, as per registered PD /20/D.

$$EF_{grid,CM,y} = 0.6601 \text{ tCO}_2/\text{MWh} * 0.75 + 0.2900 \text{ tCO}_2/\text{MWh} * 0.25 = 0.5676$$

No project emissions occur from renewable generation. Auxiliary consumption (< 1 % of output) is excluded per ACM0002. The *calculation approach is appropriate*.

Leakage from equipment transfer does not apply. Leakage = 0 tCO₂e.

ER_y = BE_y = EG_y * EF_{grid,CM}, = 186,100 MWh/year * 0.5676 tCO₂/MWh = 105,622 tCO₂/year (Before design deviation)

ER_y = BE_y = EG_y * EF_{grid,CM}, = 360,000 MWh/year * 0.5676 tCO₂/MWh = 204,336 tCO₂/year (After design deviation)

Average value for CP after design change: 151,382 tCO₂e

Year	Estimated baseline emissions or removals (tCO ₂ e)	Estimated project emissions or removals (tCO ₂ e)	Estimated leakage emissions (tCO ₂ e)	Estimated net GHG emission reductions or removals (tCO ₂ e)
13/09/2019-31/12/2019	31,831	0	0	31,831
2020	105,622	0	0	105,622
2021	105,622	0	0	105,622
2022	105,622	0	0	105,622
2023	105,622	0	0	105,622
2024	105,622	0	0	105,622
2025	198,116	0	0	198,116
2026	204,336	0	0	204,336
2027	204,336	0	0	204,336
2028	204,336	0	0	204,336
01/01/2029-12/09/2029	142,755	0	0	142,755
Total	1,513,821	0	0	1,513,821

BM CERTIFICATION SIA Reviewed the Project Description (VCS Project ID 1908) and GHG calculations from the PD and VVB cross-checked for formula consistency and consequently, BM CERTIFICATION SIA confirm that:

- The quantification methods and formulae were applied exactly as required by ACM0002 (Version 19).
- All data and parameters are reasonable, transparent and sourced from official or peer-reviewed databases.
- The baseline emissions, project emissions and leakage are correctly defined and quantifiable.
- The uncertainty level is within VCS permitted thresholds and conservative values are used where relevant.

Accordingly, the quantification of GHG emission reductions and removals is accurate, complete, transparent and in conformance with the VCS Standard (Version 4.7) and the VCS Validation and Verification Manual (Version 3.2).

3.3.7 Methodology Deviations

During the validation of the Design Change-PD, no deviations from the applied methodology ACM0002 (Version 19) or the referenced tools were identified or requested by the PP.

3.3.8 Monitoring Plan

The project activity's MP, as described in PD, defines the process and schedule for obtaining, recording, compiling and analyzing all data necessary to quantify GHG emission reductions in accordance with ACM0002 (Version 19) and the Tool to Calculate the Emission Factor for an Electricity System (Version 6.0).

BM CERTIFICATION SIA reviewed the MP against the methodology requirements, national grid regulations and the actual configuration of the hybrid wind-solar facility during the on-site validation audit.

EG_{PJ,y} "Net electricity supplied to the national grid by the project" is monitored via 4 meters installed at 2 transformers.

Data collection is carried out through the facility's SCADA system, which continuously records hourly readings from all main and backup export meters. These readings are automatically logged and cross-checked against TEİAŞ monthly billing data to ensure consistency. The O&M Department downloads and verifies monthly CSV exports and stores them on a secure server with restricted access rights. Data is monitored continuously by redundant metering devices, which provides the data for the monthly invoicing to TEİAŞ. All meters are in compliance with the communiqué for Metering Devices to be used in the Electricity Market. Information about the old and current meters, main and spare (back-up) are given in the following tables:

Name	Brand & Model	Serial Number	Accuracy Class	Meter Test Date	Protocol Date
Main Meter	ITRON & SL761W071	84051056	0.2S	17-August-2025	13-September-2019
Main Meter-II	ITRON & SL761W071	84051121	0.2S	17-August-2025	13-September-2019
Back-up Meter	ITRON & SL761W071	84051120	0.2S	17-August-2025	13-September-2019
Back-up Meter-II	ITRON & SL761W071	84051122	0.2S	17-August-2025 /16/	13-September-2019

Quality control is maintained through monthly reconciliation of TEİAŞ invoices with SCADA system exports, enabling timely identification and correction of any data gaps or anomalies. All electricity meters are calibrated annually in accordance with EMRA Regulation No. EÜ/8909-6/04344 (Decision dated 07/11/2019), and the reviewed calibration certificates were found to be valid. Backup data generated by the SCADA system ensure full redundancy in the event of loss or corruption of primary meter data.

The monitoring process is implemented by qualified electrical and mechanical engineers whose roles and responsibilities were reviewed during validation. Quality assurance and quality control procedures, including dual verification, routine cross-checks and error flagging mechanisms, are applied to maintain measurement errors below 0.5%.

The validation confirmed that the installed meters comply with accuracy class 0.2 S requirements and that calibration intervals are consistent with ACM0002 and applicable national metering standards. Uncertainty analyses presented in the PD demonstrate a combined measurement uncertainty below $\pm 1\%$, which is within the acceptable limits defined under the VCS Standard.

BM CERTIFICATION SIA performed a detailed assessment of the monitored parameters against the requirements of ACM0002 and verified that the monitoring frequency, measurement units, calculation methods and data management procedures are fully aligned with the applied methodology. The review also confirmed that QA/QC procedures, calibration schedules, data archiving practices and personnel responsibilities are adequately defined and implemented.

All monitoring records, including meter readings, calibration certificates and QA/QC documentation, are retained for a minimum of two years after the end of the final crediting period in accordance with applicable legal requirements.

No material discrepancies were identified between the project Monitoring Plan (MP) and the requirements of the applied methodology.

BM CERTIFICATION SIA therefore concludes that the Monitoring Plan is complete, accurate and compliant with the requirements of ACM0002 (Version 19), the VCS Standard (Version 4.7) and the VCS Validation and Verification Manual (Version 3.2). The monitoring system and associated QA/QC procedures are considered sufficient to ensure that GHG emission reductions will remain measurable, reportable and verifiable throughout the crediting period.

3.4 Non-Permanence Risk Analysis

The applied methodology and project type (grid-connected renewable energy generation) do not involve carbon storage in biomass or soil carbon pools. Therefore, the project activity is not subject to non-permanence risks as defined under the AFOLU Non-Permanence Risk Tool and no buffer withholding applies.

4 VALIDATION OPINION

4.1 Validation Summary

BM CERTIFICATION SIA conducted the Design Change Validation of the “Denizli Wind Power Project, Turkey” (VCS Registry No.: 1908), located in Türkiye, covering the period from 13 September 2019 to 12 September 2029, with a reasonable level of assurance.

The GHG Statement and all associated documentation remain the sole responsibility of the Project Proponent, “Life İklim ve Enerji Ltd. Şti.”

The validation was performed in accordance with the design change validation requirements defined under the Verified Carbon Standard (VCS) Version 4.7 and the VCS Validation and Verification Manual Version 3.2. Host country regulatory and permitting requirements in Türkiye, including compliance with the Turkish EMRA licensing framework, were also taken into consideration to confirm the continued legal conformity of the project activity.

The validation activities were carried out by a competent and qualified validation team comprising:

- Team Leader: Mrs. Fikriye Seda ATABEK
- Validator: Mrs. Seymanur ERSOY

- Internal Technical Reviewer (ITR): Mrs. Jaya Rajput

The project activity was assessed against the following applicable standards and references:

- VCS Standard (Version 4.7)
- VCS Validation and Verification Manual (Version 3.2)
- Approved Consolidated Baseline and Monitoring Methodology ACM0002 (Version 19)
- ISO 14064-3:2019 – Specification with Guidance for the Validation and Verification of Greenhouse Gas Statements

BM CERTIFICATION SIA confirms that the project activity remains aligned with the scope and objectives of the registered VCS project and that the proposed design modifications — including revised turbine models, updated inverter configurations, and optimization of the internal electrical system layout — do not affect the project boundary, baseline scenario, or eligibility under the applied methodology.

The assumptions applied for the updated electricity generation profile, grid emission factor, and plant load factor were reviewed and determined to be reasonable, conservative, and consistent with current national grid data published by EPIAŞ and TEİAŞ.

Based on the validation activities performed, BM CERTIFICATION SIA concludes that:

- The design change remains methodologically consistent with ACM0002 (Version 19);
- The assumptions and parameters applied are conservative and comply with VCS requirements;
- The project activity continues to satisfy additionality requirements and remains eligible under the VCS Standard;
- The estimated emission reductions, averaging 151,382 tCO₂e annually, remain achievable under the revised design; and
- No material discrepancies or adverse findings were identified that could impact the project's conformity or the integrity of the baseline scenario.

Accordingly, BM CERTIFICATION SIA issues a positive validation opinion regarding the Design Change of the “Denizli Wind Power Project, Turkey,” as presented in the revised Project Description (PD), confirming that:

- The project activity continues to comply with all applicable host-country regulatory requirements;
- The project activity continues to comply with all relevant requirements of the VCS Standard (Version 4.7);

- The applied baseline and monitoring methodology ACM0002 (Version 19) remains applicable and has been correctly implemented;
- The project activity's additionality remains adequately demonstrated; and
- The project activity is expected to achieve the stated emission reductions throughout the crediting period.

Therefore, BM CERTIFICATION SIA concludes that the Design Change Validation results in a positive validation opinion without any qualifications or modifications.

4.2 Validation Conclusion

The data and information supporting the GHG statement assertion are projected in nature, as this validation concerns a design change rather than a monitoring verification.

The emission reduction estimates are based on updated technical specifications (revised installed capacity), the most recent grid emission factor published by Ministry of Environment, Urbanization and Climate Change for the national grid (0.6261 tCO₂/MWh) and projected net electricity generation data derived from the project activity's feasibility study and O&M performance models.

All assumptions, limitations and calculation methods were reviewed by BM CERTIFICATION SIA and deemed reasonable, transparent and conservative.

The calculations adhere to the procedures prescribed in ACM0002 (Version 19), applying conservative default factors where uncertainty exists.

The principal assumptions include:

- Annual estimated electricity generation: 360,000 MWh/year, based on the P75 factor from the wind & solar-technical due diligences;
- Auxiliary consumption: 1.2 % of gross generation;
- Grid emission factor: 0.6261 tCO₂/MWh (most recent available from Ministry of Environment, Urbanization and Climate Change, consistent with the registered PD /20/);
- Project emissions: limited to minor on-site consumption during operation and auxiliary load;
- Leakage emissions: not applicable, as no equipment transfer or displacement of existing installations occurs.

BM CERTIFICATION SIA confirm that the methodology was correctly applied and that the estimation of baseline, project and leakage emissions follow the equations and data sources defined in ACM0002 (Version 19) and the VCS Standard (Version 4.7).

BM CERTIFICATION SIA conclude that the project activity is likely to achieve the validated emission reduction estimates, provided that operational conditions remain consistent with the assumptions stated in the revised PD.

Vintage period	Estimated baseline emissions (tCO ₂ e)	Estimated project emissions (tCO ₂ e)	Estimated leakage emissions (tCO ₂ e)	Estimated reduction VCUs (tCO ₂ e)	Estimated removal VCUs (tCO ₂ e)	Estimated total VCUs (tCO ₂ e)
13/09/2019-31/12/2019	31,831	0	0	31,831	0	31,831
2020	105,622			105,622		105,622
2021	105,622			105,622		105,622
2022	105,622			105,622		105,622
2023	105,622			105,622		105,622
2024	105,622			105,622		105,622
2025	198,116			198,116		198,116
2026	204,336			204,336		204,336
2027	204,336			204,336		204,336
2028	204,336			204,336		204,336
01/01/2029-12/09/2029	142,755			142,755		142,755
Total	1,513,821	0	0	1,513,821	0	1,513,821

BM CERTIFICATION SIA therefore conclude that the Design Change Validation confirms the project activity's continued eligibility under the VCS Standard, with no impact on baseline or methodological consistency and requests the continued registration of the "Denizli Wind Power Project, Turkey" as a VCS project activity under the revised design configuration.

		
Fikriye Seda ATABEK	Jaya Rajput	Māris Zamovskis
Team Leader	Independent Technical Reviewer	Decision Maker
05 September 2026		

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

Use the table below to describe the commercially sensitive information included in the project description to be excluded in the public version.

Section	Information	Justification	Assessment method and conclusion

APPENDIX 2: VALIDATION PROTOCOL

Project ID & Name:	Denizli WPP							
Project Developer:	Korda Enerji Üretim Pazarlama İthalat ve İhracat A.Ş.							
Reporting Period:	DC RENEWAL							
List of Findings version :	4.0							
Corrective Action Request (CAR), Calibration Request (CL), Forward Action Request (FAR)	Finding	Date (First findings dated DD/MM/YYYY)	Section of Protocol/ Methodology or Program Document	Project Developer Response and Date	BMC response and Date	Additional Project Developer Response and Date	Additional BMC Response and Date	Open or Closed
CAR								
CAR 1	Verra registry has v6 of PD dated 13/10/2021 for initial validation. The PD sent for this DC is v5, please make sure you revised the latest PD and add any missing revisions	28/03/2026	PD cover page	<u>14.04.2026</u> The Project Description has been revised to incorporate all updates from the validation PDD v6 (dated 13/10/2021). The version numbers have also been updated for this DC: the initial PD is now v7, and the revised version that has been	21/05/2026 Ok closed (versions clarified) .			closed

	that took place in v6 of validation PDD, also revise the version numbers for initial PD for this DC (v7) and the revised version that you will be sending (v8)			submitted is v8.				
CAR 2	The v6 of PD and VR in the registry says 3 MW X22 turbines = 66 MW This PD says "The initial installed capacity of the Project was 121 MWm/99 MWe". Please clarify. Please state more clearly (tabulate) the existing capacity, units and generation and added units with their capacities	28/03/2026	PD 1.1	The initial design of the Project was 3 MWx22 Turbines =66 MW. Thus, the statment has been revised accordingly.	21/05/2026 Ok closed (statem ent correcte d).			closed

CAR 3 and generation . Please clarify in PD that the equipment agreement is more than “5.7629 MWm solar unit” but the license limitation is as such.							
	28/03/2026	PD 1.1	The licensed capacity (5.7629 MW AC) defines the maximum power at the grid connection point, while the panel procurement contract (6.320 MW DC) refers to the nominal installed capacity of the modules under standard test conditions; as these two figures represent different physical quantities, they cannot be directly compared. The resulting DC/AC ratio of 1.097 reflects standard industry oversizing practice (typical range: 1.10–1.30), applied to	21/05/2026 Ok closed (footnote added and clarified)			closed

CAR 4 According to project revised license project has 27 wind turbines, please state in DC PD correctly (addition			compensate for panel degradation, cabling and inverter losses, and real-world operating conditions over the project lifetime. Since the power delivered to the grid is strictly capped at 5.7629 MW by the inverter control system under all operating conditions, the licensed capacity <u>cannot</u> be exceeded. This information is included in section 1.1 as a footnote.				
	28/03/2026	PD 1.1	The statement has been corrected in the DC PD. Following the addition of five new turbines, Denizli WPP now comprises a total of 27 turbines. The DC PD has been revised accordingly.	21/05/2026 Ok closed (additions clarified) .			closed

	of two turbines).						
CAR 5	Please clarify in PD if the solar part has been commissioned or not.	28/03/2026	PD 1.1	Solar part has been commissioned on 04/09/2025. Relevant information has been included in DC PD.	21/05/2026 Ok closed (date added).		closed
CAR 6	Please provide initial acceptances of the project to verify the CP start date.	28/03/2026	1.5	Initial acceptance documents have been provided as a supporting document now.	21/05/2026 Ok closed (references provided).		closed
CAR7	In PD "18/06/2019-17/06/2029" and "1,421,330" do not match with excel provided	28/03/2026	PD 1.1	DC PD-Crediting period date and estimated ER amounts have been corrected in line with the ER Excel Sheet of Denizli WPP	21/05/2026 Ok closed (values corrected).		closed
CAR8	ACM19 is stated in V6 of the registered PD	28/03/2026	PD 1.2	ACM Version has been revised in line with the latest version of registered PD(v6).Related parts have been corrected and revised according to ACM0002 v19.	21/05/2026 Ok closed (versions clarified).		closed
CAR9	Check info in 1.5 and 1.6 of the PD, check v6 of PD	28/03/2026	1.5, 1.6	Section 1.5 and 1.6 has been checked and corrected in line with	21/05/2026 Ok closed (sections		closed

			the registered PD (v6)	corrected).			
CAR10	Check CP dates in 1.7 and 3.4 of PD	28/03/2026	1.7 3.4	CP dates have been checked and corrected.	21/05/2026 Ok closed (versions clarified).		closed
CAR11	Please explain in PD why the revised numbers occur in beginning of 2026.	28/03/2026	1.7	Related explanation has been added regarding revised ER amounts have been occurred as of 2026.	21/05/2026 Ok closed (DC has been applied as of first capacity addition date).		closed
CAR12	Please include SPP coordinates in the PD too	28/03/2026	1.9	SPP corner coordinates have been included in DC PD as well.	21/05/2026 Ok closed (added).		closed
CAR13	Please state in 1.11 of PD if SPP complies with regulations and state which ones. Section 1.11 is more detailed in v6 of PD.	28/03/2026	1.11	Further explanation regarding related laws and regulation has been added in line with v6. Also, an explanation has been included regarding how added capacity remains fully compliant with the applicable regulations and requirements.	21/05/2026 Ok closed (regulations clarified).		closed

CAR14	Re evaluate applicability with ACM19 which is given in v6 of PD	28/03/2026	2.2	Applicability of ACM0002 Methodology has been re-evaluated in line with the v19 which is applied version in the latest version of registered PD.	21/05/2026 Ok closed (applicability explained).			closed
CAR15	Üçpınar WPP mentioned in PD.	28/03/2026	2.3	Corrected.	21/05/2026 Ok closed (corrected).			closed
CAR16	Timeline table in PD does not include correct CP date (as seen in verification report by RINA), also does not include acceptance dates and MP dates, license revision and EIA revision dates.	28/03/2026	2.5	The CP dates in Section 2.5 have been updated. The timeline table now also includes the MP dates, acceptance dates, license revision date, and EIA revision dates regarding capacity additions.	21/05/2026 Ok closed (dates given).			closed
CAR17	Investment decision for added capacities shall be stated in timeline	28/03/2026	2.5	Investment decision date for added capacities have been stated in timeline in Section 2.5.	21/05/2026 Ok closed (date given).			closed

CAR18	Please provide the initial IRR excel for comparison	28/03/2026	2.5	Initial IRR analysis has been provided for reference.	21/05/2026 Ok closed (provided).			closed
CAR19	In table of IRR inputs of added capacity please demonstrate other values like investment cost and OPEX.	28/03/2026	2.5	Investment costs and OPEX have been included in IRR inputs.	21/05/2026 Ok closed (inputs given).			closed
CAR20	Please show the benchmark breaching values in PD as the sensitivity results are very close to benchmark.	28/03/2026	2.5	Breaching values have also been included along with the sensitivity analysis in DC PD and IRR Sheet	21/05/2026 Ok closed (sensitivity revised).			closed
CAR21	SPP contract shows 1.2 MIO USD please explain the breakdown for cell B35 in IRR excel.	28/03/2026	2.5	Breakdown amount specified in SPP contract has been stated in Cell B35 in IRR Excel along with the reference.	21/05/2026 Ok closed (breakdown provided).			closed
CAR22	Common practice shall be revised to include	28/03/2026	2.5	The date related to capacity additions was filtered out in Step 2, and in Step 3, both	21/05/2026 Ok closed (CP revised).			closed

	both wind+solar plants in step 3 and also take into account investment decision date for capacity additions			wind and solar plants were included. The Common Practice analysis has now been finalized.				
CAR23	3.2 pd states wind power plant, please re-evaluate the PD considering wind-solar power plant, state if the solar addition effects project emissions, for instance	28/03/2026	3.2	The PD has been re-evaluated to reflect a combined wind-solar power plant. It has been assessed whether the solar capacity addition affects project emissions, and the findings have been incorporated into the updated PD.	21/05/2026 Ok closed (clarified).			closed
CAR24	4.2 of PD state how the monitoring is done for SPP and added turbines, monitoring with new meters or how?	28/03/2026	4.2	The monitoring for the SPP and the added turbines will be performed together through two main meter and two back-up meter; however, the output of each turbine can be individually	21/05/2026 Ok closed (meters clarified).			closed

CAR25 Please evaluate under “Water Quality and Quantity” panel washing activity, state under each safeguard if SPP is also relevant.			monitored via the SCADA system. The explanation has now been added to Section 4.2.				
	28/03/2026	5.1	Water use for panel washing is not a routine operational requirement for the SPP. In line with common practice for PV installations in Türkiye, the modules are primarily cleaned through natural precipitation (rainfall), which provides regular passive soiling removal. Any cleaning, if required, is performed on an as-needed basis under specific conditions (e.g. exceptional dust accumulation events) and is not part of a scheduled maintenance activity. In such cases, water use is minimal and does not constitute a material consumption affecting local	21/05/2026 Ok closed (issue clarified) .			closed

			water resources. Accordingly, no significant or continuous water demand is associated with PV operation, and no impact on water quality or quantity is expected. Necessary information regarding this safeguard has been included in DC PD.				
CAR26	5.2 of Pd please give details about EIA for capacity addition	28/03/2026	5.2	Information regarding EIA processes and decisions by the relevant authorities for the capacity addition has been included in Section 5.2.	21/05/2026 Ok closed (EIA clarified) .		closed
CAR27	State in 5.3 of PD about how stakeholders have been informed about added capacity and the existing grievance mechanism	28/03/2026	5.3	The relevant information has been included in Section 5.3 of the PD.	21/05/2026 Ok closed (grievance clarified) .		closed

CAR28	Comment on effect of SPP on endemic species in the area.	28/03/2026	5.1	Based on the “No EIA Required” decision obtained for the SPP, the project is not expected to have any significant adverse impact on endemic species in the area. The assessment conducted by the competent authority concluded that the scale and nature of the project do not pose a risk to local biodiversity, including endemic flora and fauna. Accordingly, no negative effects on endemic species are expected. Related information has been included in Section 5.1 as well.	21/05/2026 Ok closed (clarified).			closed
	SDGs the project contributes to are not	28/05/2026	ITR	The PD has been updated to include the SDGs to which the project	21/05/2026 Ok closed (added).			

CAR30	mentioned in PD.			contributes in Section 1.17				
	More recent version of methodology is available.	28/05/2026	ITR	The project is currently within an ongoing crediting period and applies the methodology version that was valid and applicable at the time of validation/registration. The applicability of newer methodology versions will be assessed at the time of the next crediting period renewal.	06/06/2026 Not closed(Please quote related standard item that says these updates are not necessary at DC validation).	08/06/2026 VCS Standard v4.7 does not establish methodology version or emission factor updates as a requirement of DC validation. These updates are specifically associated with crediting period renewal (Section 3.9.8), while Section 3.20 contains no equivalent requirement. In addition, Section 3.20.2(4) explicitly provide	08/06/2026 Ok closed.	

					s that transition to a newer methodology version during an active crediting period is optional. Related information has been provided as a footnote in PD. Therefore, no provision has been identified in VCS v4.7 or ACM0002 that would require a methodology or emission factor update as a consequence of DC validation.		
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CAR31 Tools used need to be checked, CP tool is not mentioned and additional tool is not stated correctly, please refer only to tools used, the versions need to be latest versions. Applicability of tools are not given in PD.	28/05/2026	ITR	The tools referenced in the Project Description have been reviewed and the necessary revisions have been made(CP has been added). The project is currently within an ongoing crediting period, and the versions of the applied tools remain valid and applicable under the relevant requirements.	06/06/2026 Not closed(Please quote related standard item that says these updates are not necessary at DC validation).	08/06/2026 VCS Standard v4.7 does not establish methodology version or emission factor updates as a requirement of DC validation. These updates are specifically associated with crediting period renewal (Section 3.9.8), while Section 3.20 contains no equivalent requirement. In addition, Section 3.20.2(4) explicitly provides that transition to a newer	08/06/2026 Ok closed.	
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CAR32	More recent EF is available for 2025 when capacity addition is occurring				methodology version during an active crediting period is optional. Therefore, no provision has been identified in VCS v4.7 or ACM0002 that would require a methodology or emission factor update as a consequence of DC validation.		
		28/05/2026	ITR	The project is currently within an ongoing crediting period and applies the emission factor determined in accordance with the applicable methodology requirements. The	06/06/2026 Not closed(Please quote related standard item that says these updates are not necessary at DC validation).	08/06/2026 VCS Standard v4.7 does not establish methodology version or emission factor updates as a requirement of	08/06/2026 Ok closed.

			availability of a more recent emission factor does not automatically trigger a mandatory update during an active crediting period. Any requirement to adopt updated emission factors will be assessed in accordance with the applicable methodology and standard requirements at the time of the next crediting period renewal.		DC validation. These updates are specifically associated with crediting period renewal (Section 3.9.8), while Section 3.20 contains no equivalent requirement. In addition, Section 3.20.2(4) explicitly provides that transition to a newer methodology version during an active crediting period is optional. Therefore, no provision has been identified		
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					d in VCS v4.7 or ACM002 that would require a methodology or emission factor update as a consequence of DC validation.		
CAR33	2 transformers and 4 meters have been validated on site, check PD.	28/05/2026	ITR	The Project Description has been reviewed against the site validation findings and TM has been revised where necessary to ensure consistency with the equipment verified during the site visit. Details regarding 4 meters have been provided as verified during the site visit.	06/06/2026 Not closed(PDD says two meters, please search for word "two").	08/06/2026 Checked and corrected.	08/06/2026 Ok closed.
CAR34	PD version 4.4 is available.	28/05/2026	ITR	PD has been updated to Version 4.4	06/06/2026 Not closed(Please update PDD version	08/06/2026 The PDD version and revision date	08/06/2026 Ok closed.

					and date).	were already updated following the previous review round and have been reviewed again in the current revision for consistency. However, the original date of issue has been retained, as the project remains within the same ongoing crediting period and no new project issuance has occurred.		
CAR35	VCS standard version 4.7 is available.	28/05/2026	ITR	The revisions has been reflected accordingly with Version 4.7	06/06/2026 Ok closed(version revised).			
CAR36	In PD, please tabulate the			Changes related to design change has been	21/05/2026 Ok closed			

	information about design change as such			provided in tabular format in Section 1.1 as commented	(clarified).			
CAR37			number of turbines	total capacity	date of being operational	the estimated annual net electricity generation	expected to achieve annual emission reductions	
CAR38		initial design						
		wind turbines addition						
		SPP addition						
CAR39								
CAR40								
CAR41								
CAR42								
CAR43								
CAR44								
CL								
CL 1								
CL 2								
FAR								
FAR 1								
FAR 2								

APPENDIX 3: VERIFICATION TEAM AND ITR COMPETENCE

Team Leader /Lead Verifier

Fikriye Seda ATABEK is qualified Team Leader and auditor for scope 1.1-2, 3.1 and 13.1 for validation and verification of GHG projects. Since 2010, she has been a lead verifier/verifier/technical reviewer for 400+ projects under Gold Standard/ VERRA/ GCC and ICR. Seda has B.Sc. in Chemical Engineering from Istanbul Technical University, M.Sc. in Energy Science and Technology from Istanbul Technical University and Executive MBA from Koç University.

Şeymanur Ersoy is a qualified carbon project developer and sustainability professional, currently lead validator/verifier for scope 1.1-2, 3.1 and 13.1-2 for validation and verification of GHG projects for BM Certification SIA. She has over 5 years of hands-on experience in the voluntary carbon market, having developed 36 VERRA and Gold Standard projects for more than 20 companies. Ersoy holds a Master's degree in Bioengineering from Izmir University of Economics and a Bachelor's degree from Ege University.

Independent Technical Reviewer

Jaya Rajput is a qualified Team Leader and Lead Auditor for validation and verification of GHG emission reduction projects under Verra, Gold Standard, SD Vista, and CDM. She has been involved in the assessment of over 30 projects across sectors 1 (Energy industries), 3 (Energy demand), and 13 (Waste handling and disposal). Jaya holds an M.Sc. in Environmental Science and Technology and a B.Sc. in Life Sciences, and is a certified GHG Lead Verifier/Validator under ISO 14064.