

Title	Grievance Step 1 Review GS2542
From	Gold Standard Secretariat
Date	May 12, 2019
Subject	Grievance Çeşme Wind Power Project, Turkey
Scope	<p><a href="#">Gold Standard Version 2.2</a>* for Gold Standard VERs Methodology UNFCCC <a href="#">ACM0002</a></p> <p><i>*Note that Gold Standard Version 2.2 is now superceded by Gold Standard for the Global Goals (GS4GG). All projects are required to transition to GS4GG at next Verification. As this project has not yet transitioned to GS4GG the applicable scope for this grievance is Version 2.2.</i></p>

Ref Document: GS2542\_Grievance letter

## **1 - Purpose and Summary Findings:**

This document represents the formal output of the first step in the Gold Standard's published Grievance Process ([here](#)) as related to a grievance submission concerning GS2542 (Cesme Wind Power Project, Turkey, hereafter 'the Project'). It is intended to inform the following steps:

- to make a go/no-go decision on further investigation
- to publish to the Gold Standard website
- the appointment of the investigation team
- the finalization of the investigation workplan and Terms of Reference.

The findings and decisions of this review, as detailed in the following memo are summarised as follows:

- The grievances raised (see Section 2, below) if proven are considered to represent a material and significant non-conformity against the Gold Standard Requirements and therefore warrant further investigation
- The grievance will be published to the Gold Standard website and relevant parties notified
- The investigation will seek to determine the facts of the grievance and to make recommendations for final decision on any actions to be taken

It is noted that the above does not presume any outcome of the investigation.

## 2 – Grievance Background:

On 30 April 2019, Madeleine Staaf Kura submitted a letter requesting an official grievance be raised against a registered Gold Standard project - Çeşme Wind Power Project, Turkey (GS ID 2542 – GS Version 2.2). The complainant alleged that the project developer had not adhered to Gold standard principles during the implementation and operation phase of the project activity and had submitted to Register the project using misleading information.

Specifically, the allegations concern the following:

- Breaches of Gold Standard principles concerning safeguarding and Do No Harm (Principle 1)
- Failure to provide sustainable development benefits (Principle 2)
- Failure to include relevant stakeholders/conduct a stakeholder consultation (Principle 3)
- Concerns raised about removal of existing vegetation and associated leakage (Principle 4)
- Failure to comply with relevant local laws (Principle 5)
- False or misleading information contained in Monitoring Reports (Principle 7)

It is further noted that Turkey’s Federal Court has previously ruled against the project plan.

For expedience the full details of the allegations are not repeated in this review memo, the complainant’s letter is instead published to the Gold Standard website.

If, subject to further investigation any of the above allegations are found to be true, then the project is in non-compliance with GS principles.

## 3 - Project background:

ABK Çeşme RES Enerji Üretim A.Ş. (hereafter referred to as “ABK Çeşme”) developed Wind Power project - Çeşme Wind Power Project in Turkey. The project activity involves installation and operation 6 wind turbines with 3MW capacities - a total 18 MW installed capacity. The generated electricity is supplied to the grid. The table below provides the key project information and certification related milestones.

Table: Project details and key milestones

Project GS ID	GS2542
Project Title	Çeşme Wind Power Project, Turkey
Project participant	ABK Çeşme RES Enerji Elektrik Üretim A.Ş.
Project type	Wind Power - installed capacity of 18 MW (6*3 MW)
Standard version	V2.2
Registration type	Retroactive

Validation site visit	25/11/2014
Registration date	04/02/2016
Crediting period start	22/07/2015
1st monitoring period	23/05/2015-31/07/2017
Verification site visit	18/08/2017
Credit issued	48088
Project registry link	<a href="https://registry.goldstandard.org/projects/details/411">https://registry.goldstandard.org/projects/details/411</a>

#### **4 – GS Secretariat Decision:**

Allegations of non-compliance have been raised against the project, notably concerning the GS principles of do no harm, local laws and presenting misleading information, as summarized in Section 2, above and further detailed in the Complainant’s letter. The allegations, if proven true, are considered to be:

- A non-conformity against Gold Standard Principles and Requirements
- Significant and material

It is therefore decided to proceed as follows, in line with the published Grievance Process:

1. Notify the Project Developer and publish the grievance details to the Gold Standard website (Process Step 1)
2. Appoint the Gold Standard team, Technical Advisory Committee (TAC) Members and any independent experts to oversee the investigation (Process Step 2)
3. Develop Terms of Reference and work plan for the investigation, based on the high-level plan included in Section 5, below (Process Step 2)

Regarding point 2, above, it is considered that the current Gold Standard team (led by Technical Director Vikash Talyan) does not have a material conflict of interest in leading the investigation. To provide further, independent oversight the Gold Standard TAC will be notified and will monitor/review findings. This has been noted under Step 2 of the process, included in Section 5, below.

Furthermore, and given the local-nature of the grievance allegations and the potential language barriers, it is decided that a local, independent (of Gold Standard, the Complainant and the Project) expert will be appointed to carry out part of the investigation.

## **5 - High level investigation plan:**

In accordance with the decision to commence investigation the following high-level investigation plan is provided (in line with the published Grievance Process):

Step 1: Conduct review and make go/no go decision – complete with this document

Step 2: Appoint the grievance investigation team from the Secretariat – May/June 2019

The second step in the Gold Standard grievance investigation process is to appoint the investigation team.

It has been decided and included in this report that the investigative process will be facilitated by Gold Standard's Abhishek Goyal (Senior Technical Director), who has no previous material involvement with the project. The lead investigator is Vikash Talyan (Technical Director), who has no previous ties to the project or any of its past reviews. To assist and advise the lead investigator, an independent, local expert will also be appointed – this will be conducted concurrently with Step 3, below (as the TORs will form part of the expert appointment).

Step 3: Draft the Terms of Reference for the grievance – May 2019

The third step is to define the scope of the investigation. The scope will be memorialized in the Terms of Reference along with a more detailed workplan, which will be reviewed by the Gold Standard's Technical Governance Committee with concurrent notification to The Gold Standard Foundation Board of Directors. The final Terms of Reference will be posted to the Gold Standard website.

Step 4: Flag the Registry Account – concurrent with Step 1, above

In accordance with Gold Standard policy and for the purpose of transparency, Gold Standard will also place a flag on Çeşme Wind Power Project's Gold Standard Registry account that the project is under investigation. The flag appears on the main project page and states: "The Gold Standard is currently investigating a grievance associated with this project: Weblink)."

Step 5: Solicit additional feedback to the review – June to August 2019 (dependent on availability/extent)

Gold Standard Secretariat, supported by the appointed independent, local expert will further solicit feedback from the Complainant, Project Developer, the auditor and any other relevant party identified through the course of these discussions. This Step will involve site visits as required and hence the timeline is subject to change.

It is critical in every grievance investigation to ensure that the project developer and other interested parties have the opportunity to provide feedback. After the Terms of Reference are completed, the Gold Standard will notify project developer of the

grievance (including the Terms of Reference and this Assessment and Investigation Plan) and ask for feedback on grievance.

At this stage it is also important to solicit feedback from validating and verifying auditor that approved the validation and verification report(s). The role of the auditors is to ensure the credibility of the certification through third party assessment. The reputation of the auditor(s) that performed the validation and verification(s) is also at stake, and individual(s) should be given an opportunity to provide feedback in this investigation.

#### Step 6: Desk review – July/August 2019

Information collated from Step 5 will be including in a desk review of the allegations, alongside the project documents. The review of this information will be conducted by the Gold Standard Secretariat.

The conclusion of this step may further update the TORs and workplan and require further on-site visits.

The investigation team will produce a Preliminary Report that includes draft findings of fact, recommendations, and reasoning that underlies those recommendations.

#### Step 7: Preliminary Review Peer Review – September 2019

The output of Step 6 will be Peer Reviewed by:

- The Gold Standard Chief Technical Officer and other members of the Gold Standard Management Team as required
- The Gold Standard Technical Advisory Committee
- The independent expert appointed to support the investigation
- Other independent experts if deemed required

#### Step 8: Revise Report and share with Project Developer and other interested Stakeholders – September/October 2019

The final report draft is shared with the Project Developer and other interested stakeholders. The final findings, decisions and actions to be taken are included in the report and are at the sole discretion of Gold Standard. This step does not require to involve further feedback from stakeholders.

#### Step 9: Final draft report sent to Gold Standard Board for approval – October 2019

The final version of the report will be sent to an executive committee of The Gold Standard Foundation Board of Directors for discussion and approval.

#### Step 10: Secretariat finalizes report and publishes it to website – October/November 2019 (timeline for any actions TBC)

After the final version of the report is approved by the executive committee of the Board, the report will be approved by the Secretariat and published to the Gold Standard website. The recommendations of the report will be implemented.

It is noted that only the final output of Step 10 will be published to the Gold Standard website, draft reports from earlier steps are not published.