

28 October 2015 - *shortened and updated version of letter to Gold Standard Foundation dated 6 July 2015 for the purposes of publishing in the Gold Standard Foundation's new web site*

The Gold Standard Foundation
Avenue Louis Casai 79 CH-1216
Geneva-Cointrin Switzerland

To: **Pinar Ozturk**, Regional Manager, Turkey
Neha Rao, Head of Certification
Lisa Rosen, Chief Operations Officer
Owen Hewlett, Chief Technical Officer
Marion Verles, Chief Executive Officer

Re: **Ruzgar Elektrik Uretim, A.S.**, registered owner of production licence

- Previously known as **Ruzgar Elektrik Uretim Ltd. Sti.**
- **An affiliate of ATASEVEN GROUP**
Ceyhun Atuf Kansu Caddesi, 1271. Sokak
Sumer Is Merkezi, No. 15/16
06520 Balgat, Ankara, TURKEY
- Stocks owned by **YIGITRES Elektrik Uretim A.S.** as of 04.12.2013
(See Attachment: 1)

GERIS Rüzgar Enerji Santrali

- **GERIS Wind Power Plant project, Yalikavak, Bodrum, Turkey**
(Not to be confused with nearby AKYARLAR Wind Power Plant project also by the same developer)
- Energy Market Regulatory Authority Licence no: **EU/3680-3/2232**
- Number of Turbines: **13** (as per developer's Project Description Booklet)
- Installed Capacity: **11.2 Mw** (as per developer's Project Description Booklet)

Project Supplier: **ENERCON GmbH** – Sales International
Teerhof 59, D-28199 Bremen, GERMANY

Your letter dated **8 April 2015** **(See Attachment: 2)**

Dear Ms. Ozturk, Ms. Rao, Ms. Rosen, Mr. Hewlett, Ms. Verles

Thank you so much for your patience and understanding until we were able to compile the attached binder with as much documentary proof as is relevant in support of our claims against the above referenced **Geris Wind Power Plant Project**. This letter is written **to also be open to public view and to be posted on your website** (www.goldstandard.org) **so that you may open a formal complaint against the GERIS Wind Power Plant Project as part of Gold Standard Foundation's grievance mechanism.**

1. As stated in your above referenced letter dated 8 April 2015, "stakeholder consultation process" is an essential part of Gold Standard's procedures. To make it clear from the start, **Ruzgar Elektrik Uretim, A.S.** had only one stakeholder meeting scheduled with the supposed stakeholders at the tiny coffehouse of the Village of Geris on **11 November 2014** with the obvious intention of obtaining as many supporting signatures from the villagers as they could in that one brief meeting. **(See Attachment: 3)**

Participants protested the proposed construction of a Wind Power Plant as well as the very skimpy overview information given which did not address any local matters at all. **No signatures of approval were granted**; no evaluation forms were filled out by the attendees because there were no relevant specific project material or an **Environmental Impact Study** presented to evaluate. **Continuous Input/Grievance Expression Process Book** which was provided after the meeting currently sits with empty pages on a shelf at the office of elected head of neighborhood in Yalikavak, Town of Bodrum, City of Mugla.

In lieu of the insufficient and, in this case, irrelevant **Continuous Input/Grievance Expression Process Book** provided by the Gold Standard Foundation, letters of complaint and requests for stop work order addressed to The Governor of the City of Mugla and to the Ministry of Environment and City Planning of the Republic of Turkey were signed by **1,100 + (one thousand one hundred plus)** citizens at public meetings held against the project, organized by Geris Platform.

(See Attachments: 4a and 4b)

Another **2,456 (two thousand four hundred and fifty six)** signatures against the **GERIS Wind Electrical Power Plant project** have been filed so far by **change.org** internet campaign organized by **Bodrum Peninsula Environmental Protection Platform** and addressed to the Ministry of

Environment and City Planning of the Republic of Turkey as well as five (5) other relevant agencies. (See Attachment: 5)

2. GERIS PLATFORM is a citizens' organization formed locally by a large number of local inhabitants, residents, land and business owners in the **Village of Geris and Town of Yalikavak** located on the **Bodrum Peninsula** on the **South Western Coast of Turkey**.

The PLATFORM is formed against **GERIS Wind Power Plant project**, planned to be constructed directly inside the residential areas of our village and town where citizens' livelihood depends totally on high-end tourism supported by its pristine waters, recreational marine activity, protected surrounding landscape, exceptional fauna and flora, history, ancient archeology and rich local traditions and culture.

The local citizens in large numbers are very much against this **totally out of scale and out of character project** now looming over our heads where some of the planned wind turbines are located as close as **180 meters** to year-round occupied residences, certified and protected historic villages, planned elementary and middle schools for local children, and social facilities. Some of the 100 + meter tall turbine shafts and 50 meter long blades are located to be right in the middle of planned residential land and some are located at **60 meters** to planned thoroughfare which will be creating a direct connection between Town of Bodrum and the Village of Geris where public buses, school buses, private cars, motorcycle and bicycle riders, trekkers will be present on a continuous basis!

No SAFETY ZONE is possible to be established around the turbines due to their placement within existing and planned residential, educational and recreational areas. **No mitigation is possible to prevent the public from the dangers and adverse health effects of the turbines once they are built.**

There have been **no consultations whatsoever** with the local and seasonal residents throughout the planning and certification process which, apparently, has been going on in a **very non-transparent** manner since year 2007 when the initial license to develop the project was issued by the Ministry of Energy Works in Ankara. Citizens' property rights protected by national and international laws are run over by rapid and forced expropriation of private lands to be turned over to public domain for the purposes of their being leased to the developer for

fourty nine (49) + fourty nine (49) year periods. Recent appeals by the local administrations to the Ankara Government to not issue development permits for the project have gone unnoticed. The Ankara Government and developers/investment companies are in obvious collusion in many parts of the country bypassing the wills of local administrations and the public alike, in order to establish wind energy farms in huge numbers for the sake of material gains and “supposed energy independence”, using the easy excuse of "public good". There is **total disregard** for the local people, the local economy, the natural and the man made environments which are under direct threat of damage and the existing habitats which are under threat of eventual abandonment.

3. We understand that the developer is in the process of requesting **Gold Standard Certification** at the Gold Standard Foundation in Geneva in order to make his project credit worthy and available for lucrative **emissions trading** in the international marketplace.

The project does not satisfy any of the **Gold Standard Principles as stated by the Foundation:**

Principle 1: The project shall do no harm, complying with the UNDP Millennium Development Goals (MDG) Carbon Safeguard Principles.

The project **does much harm** to human rights and the rights of the local inhabitants and to the very sensitive local environment as well as its strong but fragile high-end tourism-based economy.

Principle 2: The project shall enhance sustainable development.

The project **prevents and damages** and has no positive contribution to the sustainable development of the area. Surprisingly, **no environmental impact assessment study** was required for the development of this project in this extremely sensitive environment. **There is no mention, in the developer’s Project Description and Presentation Booklets, of the existing 1:1,000 SCALE IMPLEMENTARY ZONING PLANS on which the development of the entire area is based.**

Principle 3: The project shall involve all relevant stakeholders.

The project has **not involved any of the relevant stakeholders** from its apparent start in 2007 until now. The

community has not been able to define indicators of social, economic and environmental success, **if there are any!** The stakeholders have had no influence on the project design and are left to defend their Constitutional rights via legal means.

Principle 4: Greenhouse gas emission reductions and carbon sequestration shall be real.

No comment can be made since this is a technical matter; however, the Foundation should be aware that **thousands of mature trees are being taken down – without plans for reforestation - at other nearby wind farm construction sites on the Northern Coast of the Bodrum Peninsula, namely in and around villages of Gulluk and Mumcular.**

Principle 5: The project shall be compliant with all relevant laws and Gold Standard Principles.

The project is **non-compliant** with relevant local and international laws. Property ownership rights are being run over and properties are being expropriated in a hurry by the development company and the government against the will of property owners for very little monetary compensation. It is **not possible** for the project **to meet the noise criteria** established by World Health Organization (WHO) as well as local laws and regulations due to extremely close proximity of the turbines to occupied and planned occupiable noise sensitive areas. The project is non-compliant with Gold Standard Principals.

Principle 6: The project shall be transparent.

The project is **absolutely non-transparent**. The public has not been made aware of any parts of the process until it was time for the company to seek support from the local citizens and the unsuspecting villagers – the “stakeholders”.

No real face-to-face meetings or work sessions have been held with the local population. Several meetings and presentations held by the developer since the coming out of the Project have been one sided monologues filled with lies and deceiving, incorrect information.

Principle 7: The project's compliance and progress shall be monitored, reported and independently verified throughout the entire crediting period.

No comment could be made on the project's compliance and progress, monitoring, reporting and verification throughout the crediting period, since **there is no real do-no-harm assessment and detailed sustainable development impact assessment study** prepared for the project.

4. As a result of numerous **litigation petitions** by the local public against the project, 2nd Administrative Court in the City of Mugla had called in a **Team of nine (9) Experts** to review the cases both against the **"decision by the Governor's office that an Environmental Impact Study is not required"** for the proposed GERIS Wind Power Plant application and against the **proposed GERIS Wind Power Plant Zoning Plans and Zoning Notes.**

Copies of the Reports to the Administrative Court by the nine (9) assigned Experts which clearly state their views against the project have been filed separately with the Foundation's Regional Office in Istanbul, Turkey for further reference.

Thank you for your kind support in preventing such an ignorant, thoughtless, scaleless, hazardous and one dimensional intervention such as this INDUSTRIAL PLANT in our lives.

With best regards,

For GERIS PLATFORM of Town of Yalikavak, Bodrum, Turkey

Faruk Yorgancıoğlu, Architect and Urban Designer

B. of Arch., University of Maryland, '73

M. of Arch. and Urban Planning, YALE University, '76

+ 90 532 232 8169

farukyorgancioglu@hotmail.com

Attachments:

1. Letter from Ruzgar Uretim A.S. to 1st Administrative Court of Mugla requesting inclusion as part of defence in the court case
2. Letter from The Gold Standard dated 8 April 2015
3. Posting regarding Public Meeting dated 11 November 2014
4. a) Signature campaign addressed to the Ministry of Environment and City Planning
b) Signature campaign addressed to the Governor of Mugla
5. **Change.org** signature campaign addressed to the Ministry of Environment and City Planning
6. Litigation petition at the Administrative Court in Mugla
7. Litigation petition at the Administrative Court in Mugla
8. Litigation petition at the Administrative Court in Mugla
9. Litigation petition at the Administrative Court in Mugla
10. Litigation petition at Turkish Council of State in Ankara
11. Notice of decision to call in a Team of Experts by 2nd Administrative Court in Mugla
12. Letter from plaintiffs to 1st Administrative Court in Mugla regarding a list of issues and questions to be forwarded to the Team of Experts
13. Yalikavak (Bodrum – Mugla) 1:1,000 scale Zoning Plan, Plan Notes and Regulations
14. Regulations for Opening of Businesses and their Licensing
15. Geris Wind Power Plant Zoning Plan, Plan Notes
16. a) Geris Wind Power Plant 1:5,000 Scale Master Plan, Planning Criteria Report
b) Geris Wind Power Plant 1:1,000 Scale Implemetary Development Plan, Planning Criteria Report
17. Geris Wind Power Plant Project Description Report
18. Aydin – Denizli - Mugla 1:100,000 scale Regional Plan, partial showing Bodrum Peninsula and Geris Wind Power Plant License Area Boundary
19. Defense letter by legal counsel to the Ministry of Environment and City Planning to 1st Administrative Court in Mugla

20. Geris Wind Power Plant Zoning Plan superimposed on existing Yalikavak (Bodrum – Mugla) 1:1,000 scale Zoning Plan
21. Letter from the Ministry of Agriculture, Mugla Department of Agriculture to Municipality of Yalikavak dated 20 July 2010
22. a) Turkish Energy Markets Law
b) Turkish Energy Markets License Regulations
23. Sample photographs of existing houses, holiday villas and farm houses within the boundaries of Geris Wind Power Plant License Area Boundary
24. Actual birds fly distances from wind turbines to occupied structures, future occupiable lots and protected Historical Settlement areas
25. Detail plan showing turbines set right in the middle of residential, recreational, educational and social facilities areas
26. a) Regulations for the Assessment of Environmental Noise and Noise Management
b) Revisions to Regulations for the Assessment of Environmental Noise and Noise Management
27. Regulations for Opening of Businesses and their Licensing, Items 27 and 28
28. Method for demarcation of Wind Power Plant Area Boundary
29. Regulations for Opening of Businesses and their Licensing, Items 23, 24, 25 and 26
30. Photographs showing wind turbine hazards
31. Statement of Decision from the Ministry of Culture and Tourism’s Mugla Regional Board of Protection of Cultural Heritage
32. Generic site section and site sections taken at turbines no. 9, 11 and 13 showing protected certified archeological sites and remains
33. Report on the “IMPACT OF GERIS WIND POWER PLANT ON EXISTING CULTURAL HERITAGE AND THE ARCHEOLOGICAL LANDSCAPE” dated 2015
34. Turkish Law for the Protection of Cultural and Natural Heritage, Article 65
35. Note posted on the Web Site of the Ministry of Environment and City Planning stating the impacts of a Wind Power Generating Plant on its immediate environment