

QUALITY REPORT

# Sanibey Dam And Hydroelectric Power Plant

VCS-1100 · VCS · Türkiye

Report ID: CM-05B4A4A8 · Generated: 2026-04-02 · Scoring Methodology: General v2.0

|  |                       |            |
|--|-----------------------|------------|
| <b>5.8</b><br>Overall Score<br>out of 10 | ■ Integrity (35%)     | <b>5.6</b> |
|  | ■ Transparency (25%)  | <b>6.2</b> |
|  | ■ Claim Safety (25%)  | <b>5.1</b> |
|  | ■ Documentation (15%) | <b>7.1</b> |

Weights: Integrity 35% · Transparency 25% · Claim Safety 25% · Documentation 15%

## Assessment Summary

The project has VVB-confirmed additionality and recent monitoring/validation documentation, but several internal inconsistencies across documents raise reliability concerns. Leakage treatment is weakly supported (0% deduction with inconsistent justification), and key parameters (grid emission factor, crediting period, and ERR totals) vary between versions of reports, increasing over-crediting risk.

## Project Details

|                     |                            |
|---------------------|----------------------------|
| Registry            | Verra (VCS)                |
| Registry ID         | VCS-1100                   |
| Sector              | renewable_energy           |
| Country             | Türkiye                    |
| Vintage             | 2012, 2013, 2014           |
| Project Methodology | ACM0002 21.0               |
| Crediting Period    | 2020 — 2030                |
| VVB                 | RINA                       |
| Verified ERs        | 889,111 tCO <sub>2</sub> e |
| Monitoring Period   | 2020 — 2023                |
| Confidence          | High                       |
| Documents Reviewed  | 29 documents reviewed      |
| Scored              | 2026-04-02                 |

## Red Flags

- Large discrepancy in reported verified/claimed emission reductions between validation reports (889,111 vs 1,460,318 tCO<sub>2</sub>e).
- Grid emission factor differs materially between validation reports (0.4616 vs 0.5429), affecting baseline emissions and credit volume.
- Leakage is taken as 0% but is either not addressed (monitoring report 2024) or only asserted as negligible (validation report 2024).
- Safeguards/FPIC/grievance/benefit-sharing are reported as present in 2024 monitoring but absent in 2012 monitoring, suggesting inconsistent social documentation.

## Score Breakdown

### Integrity — 5.6 / 10

+ Additionality is confirmed by the VVB using an investment test (validation report).

- Baseline/crediting inputs show inconsistencies across documents (ERR totals, grid emission factor, and crediting period), increasing over-crediting risk.

The validation documentation confirms additionality via an investment test and indicates it was confirmed by the VVB (validation report). However, the baseline is project-specific and key baseline drivers vary across validation versions, including the grid emission factor (0.4616 vs 0.5429) and the total verified/claimed ERs (889,111 vs 1,460,318 tCO<sub>2</sub>e), which undermines confidence in baseline validity and credit quantification. Leakage is applied as a 0% deduction, but the monitoring report does not address leakage while the later validation report only deems it negligible, leaving a weak evidentiary basis for zero leakage.

### Transparency — 6.2 / 10

+ Monitoring period is clearly stated (2020-12-02 to 2023-11-30) and the same ERR figure is shown as claimed and verified in the extracted record (monitoring/validation materials).

- Conflicting figures across report versions reduce traceability and confidence in what was ultimately monitored/verified.

The monitoring period is clearly defined as 2020-12-02 to 2023-11-30 (monitoring report dated 2024-07-24), and the extracted record shows the same ER number as claimed and verified for the period (889,111 tCO<sub>2</sub>e). Transparency is reduced by conflicting values across report versions for ER totals, grid emission factor, and even the stated crediting period, making it harder for third parties to reconcile what was ultimately validated/verified. The VVB is identified as RINA, which supports audit traceability, but the volume of CARs suggests MRV clarifications were needed.

### Claim Safety — 5.1 / 10

+ Uses an established grid-connected renewable methodology (ACM0002 v21.0) with a stated baseline reassessment year (2022).

- CORSIA and CCP status are not stated in the extracted record, and contradictions in ERR and grid EF elevate greenwashing/over-crediting risk.

Over-crediting risk is elevated because two validation report versions present materially different ER totals (889,111 vs 1,460,318 tCO<sub>2</sub>e) and different grid emission factors (0.4616 vs 0.5429), both of which directly affect credited reductions. Leakage is treated as 0% with inconsistent supporting narrative between monitoring and validation, which weakens defensibility of claims. CORSIA eligibility and CCP status are not stated in the extracted record, so buyers cannot easily assess alignment with higher-integrity claim frameworks from the available extracted information.

### Documentation — 7.1 / 10

+ A relatively complete document set is referenced (PDD, monitoring report, validation report, issuance) with high extraction confidence and 17 documents used.

- Numerous corrective action requests (CAR-1 to CAR-13) indicate documentation/MRV issues that required remediation.

The extracted record indicates a broad evidence base (PDD, monitoring report, validation report, issuance) and a relatively high document count (17), with high extraction confidence. Documentation quality is nonetheless mixed because the monitoring/verification cycle generated many corrective action requests (CAR-1 through CAR-13), implying gaps or issues that required correction. Contradictions between older and newer monitoring reports on safeguards-related disclosures (FPIC, grievance mechanism, benefit sharing) also point to inconsistent documentation over time.

## Risk Indicators

|                        |  |
|------------------------|--|
| ● <b>Additionality</b> | VVB-confirmed investment test                          |
| ● <b>Permanence</b>    | Avoidance project; no reversals reported               |
| ● <b>Leakage</b>       | 0% leakage with weak/inconsistent justification        |
| ● <b>Baseline</b>      | Project-specific baseline; key parameters inconsistent |
| ● <b>Safeguards</b>    | Safeguards reported but inconsistent over time         |
| ● <b>Double-claim</b>  | CORSIA/CCP status not stated                           |

## What Would Improve This Score

→ Publish a clear change log or consolidated final parameter table reconciling ER totals, grid emission factor, and crediting period across all report versions, with explicit justification for any revisions.

→ Provide a documented leakage assessment consistent across validation and monitoring (even if negligible) and disclose safeguards evidence (FPIC records, grievance process details, benefit-sharing arrangements) in a consistent, auditable format.

## Documents Reviewed

- Issuance Representation
- Issuance Review Report
- Monitoring Report
- Communications Agreement
- Registration Representation
- Project Description
- Verification Representation
- Verification Report
- Validation Representation
- Validation Report

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