

## QUALITY REPORT

# Henan Xinxiang 24MW Biomass Based Cogeneration Project

VCS-1140 · VCS · China

Report ID: CM-ED3D1A42 · Generated: 2026-04-02 · Scoring Methodology: General v2.0

**5.6**Overall Score  
out of 10

■ Integrity (35%)	<b>5.4</b>
■ Transparency (25%)	<b>6.2</b>
■ Claim Safety (25%)	<b>5.1</b>
■ Documentation (15%)	<b>6.0</b>

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

## Assessment Summary

The project is VVB-assessed under ACM0006 and reports no material findings, but several internal inconsistencies across documents (including crediting period, additionality framing, and verified ERs) weakened confidence in the underlying record. Leakage is reported as 0% with conflicting narratives, and multiple corrective actions indicate documentation/control weaknesses even if ultimately resolved.

## Project Details

Registry	Verra (VCS)
Registry ID	VCS-1140
Sector	biomass
Country	China
Vintage	2015
Project Methodology	ACM0006 10 and 15.01
Crediting Period	2009 — 2029
VVB	TÜV Rheinland (China) Ltd.
Verified ERs	309,352 tCO <sub>2</sub> e
Monitoring Period	2018 — 2021
Confidence	Medium
Documents Reviewed	22 documents reviewed
Scored	2026-04-02

## Red Flags

- Conflicting verified ER figures across 2021 validation documents (309,352 vs 454,707) create over-crediting and reliability risk.
- Crediting period start date is inconsistent between the monitoring report (2009) and a 2021 validation report (2019).
- Safeguards/FPIC/grievance/benefit-sharing are inconsistently reported between 2013 and 2021 monitoring documentation.

## Score Breakdown

### Integrity — 5.4 / 10

- + Additionality is confirmed by the VVB and the project applies ACM0006 with a stated grid emission factor of 0.9735.
- Baseline is project-specific and key elements show reliability issues (crediting period inconsistency; multiple corrective actions; leakage narrative conflicts).

The monitoring documentation states additionality was confirmed by the VVB and describes a combined additionality approach, while the 2011 validation report frames additionality as an investment test; this inconsistency weakens confidence in the additionality narrative even if VVB confirmation is present. The baseline is described as project-specific, and the timing of baseline reassessment is not stated in the extracted record. Leakage is treated as 0% with a quantified justification in a 2021 monitoring report, but another 2021 monitoring report describes leakage as deemed negligible, which raises questions about methodological consistency. No material findings are reported, but the presence of multiple corrective actions/CARs suggests non-trivial issues were identified during review.

### Transparency — 6.2 / 10

- + Monitoring period is clearly stated (2018-01-01 to 2021-07-31) and the VVB is identified (TÜV Rheinland (China) Ltd.).
- Reported verified ERs and safeguards information conflict across documents, reducing MRV clarity and comparability.

The monitoring period (2018-01-01 to 2021-07-31) and the VVB (TÜV Rheinland (China) Ltd.) are clearly identified in the monitoring report (2021-10-13). However, the extracted record shows a major inconsistency in the verified ER total across 2021 validation documents, which undermines transparency on what was actually verified. Key MRV-related items such as grid EF vintage and usage monitoring method are not stated in the extracted record, limiting traceability of calculations beyond the single grid EF value provided.

### Claim Safety — 5.1 / 10

- + The project is explicitly not CORSIA-eligible, reducing aviation-claim channel risk.
- Contradictory verified ER totals and inconsistent leakage/safeguards statements increase greenwashing and over-crediting risk.

CORSIA eligibility is explicitly stated as false, which reduces the risk of dual-channel claims in aviation. Nonetheless, the contradiction in verified ER totals across 2021 validation documents (309,352 vs 454,707) is a direct over-crediting/claims risk because it is unclear which quantity is authoritative. Leakage is reported as 0% but with conflicting rationales (quantified vs deemed negligible), which increases the risk that stakeholders perceive the accounting as selectively presented.

### Documentation — 6.0 / 10

- + A relatively large document set was extracted (19 documents including PDD, monitoring, validation, issuance) with high extraction confidence.
- Multiple corrective actions are listed (including missing tool references and several CARs), indicating documentation quality/control gaps.

The evidence set includes PDD, monitoring report(s), validation report(s), and issuance records, with 19 documents used and high extraction confidence, supporting a mid-to-strong documentation score. At the same time, the monitoring documentation lists multiple corrective actions (including missing tool references and several CARs), indicating that key elements were incomplete or required correction during the process. Several safeguards-related fields also vary across older (2013) and newer (2021) monitoring documentation, suggesting uneven documentation practices over time.

## Risk Indicators

● <b>Additionality</b>	VVB-confirmed but inconsistent test description
● <b>Permanence</b>	No reversal risk indicated for biomass energy; no reversals reported
● <b>Leakage</b>	0% leakage with conflicting justification
● <b>Baseline</b>	Project-specific baseline; reassessment timing not evidenced
● <b>Safeguards</b>	Safeguards/FPIC and grievance inconsistently documented over time
● <b>Double-claim</b>	Not CORSIA-eligible; CCP status not evidenced

## What Would Improve This Score

→ Publish/clarify a single authoritative verified ER figure for the monitoring period with a clear reconciliation note explaining why earlier validation numbers differed.

→ Provide a consolidated safeguards package (FPIC evidence, grievance mechanism procedures, benefit-sharing description) showing continuity from early monitoring to the latest period, and explicitly document leakage assessment approach (quantified vs negligible) under ACM0006.

## Documents Reviewed

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

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