

QUALITY REPORT

# 48 MW Houqiao Hydropower Project, Yunnan, China

VCS-192 · VCS · China

Report ID: CM-EA9DD356 · Generated: 2026-04-19 · Scoring Methodology: General v2.0

|                                                              |                       |     |
|--------------------------------------------------------------|-----------------------|-----|
| <div>6.0</div> <div>Overall Score</div> <div>out of 10</div> | ■ Integrity (35%)     | 7.1 |
|                                                              | ■ Transparency (25%)  | 5.8 |
|                                                              | ■ Claim Safety (25%)  | 4.9 |
|                                                              | ■ Documentation (15%) | 5.4 |
|                                                              |                       |     |

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

## Assessment Summary

The project has some strong integrity signals, including VVB-confirmed additionality, an investment test, and no reported material findings. However, the verified issuance is far below the claimed amount, and several safeguards and leakage-related items rely on newer documents that conflict with older records, which reduces confidence in the overall claim quality.

## Project Details

|                     |                       |
|---------------------|-----------------------|
| Registry            | Verra (VCS)           |
| Registry ID         | VCS-192               |
| Sector              | renewable_energy      |
| Country             | China                 |
| Vintage             | Stale                 |
| Project Methodology | ACM0002 10.0          |
| Crediting Period    | 2006 — 2016           |
| VVB                 | TUV NORD CERT GmbH    |
| Verified ERs        | 596,949 tCO2e         |
| Monitoring Period   | 2011 — 2016           |
| Confidence          | Medium                |
| Documents Reviewed  | 15 documents reviewed |
| Scored              | 2026-04-19            |

## Red Flags

- Verified emission reductions are much lower than the amount claimed, suggesting a substantial over-claim risk.
- Several social and safeguards fields conflict across documents, including FPIC, grievance mechanism, benefit sharing, and safeguard disclosure.

## Score Breakdown

### Integrity — 7.1 / 10

+ Additionality was confirmed by the VVB, and the project used an investment test under ACM0002.

- The project shows a large gap between claimed and verified emission reductions, and reversal risk is not addressed beyond an unspecified treatment.

The verification report confirms additionality through an investment test, and the VVB, TUV NORD CERT GmbH, explicitly validated the project under ACM0002. There were no material findings or corrective actions required in the extracted record, which supports the core project case. That said, reversal risk is not clearly addressed, with reversal events marked as not addressed and no buffer pool information found in the available documents.

### Transparency — 5.8 / 10

+ The monitoring period and registry information are available, and the verification report identifies TUV NORD CERT GmbH as the VVB.

- Public-facing completeness is weakened by missing usage-monitoring details and a large discrepancy between claimed and verified ERs.

The record includes the monitoring period, registry status, methodology, and VVB identity, which helps traceability. However, usage-monitoring details are not stated in the available documents, and the extracted record does not provide a baseline reassessment date. The large difference between claimed and verified emission reductions also makes the public accounting less transparent.

### Claim Safety — 4.9 / 10

+ The project is marked as not CORSIA-eligible, which reduces dual-market claim risk.

- The verified total is far below the claimed total, and the baseline is project-specific rather than a more conservative reassessed jurisdictional baseline.

Claim safety is weakened by the large gap between claimed emission reductions and verified emission reductions, with 943,454 claimed versus 596,949 verified. The project is not CORSIA-eligible, which lowers dual-claim risk, but the baseline remains project-specific rather than a more conservative standardized or recently reassessed baseline. Leakage is treated as negligible with a 0% deduction, but the supporting justification is limited.

### Documentation — 5.4 / 10

+ Fifteen documents were used, and the extracted record shows no material findings or corrective actions required.

- Extraction confidence is only medium, and the contradiction log shows multiple conflicts between older and newer documents.

Documentation is moderately strong because fifteen documents were used and the record reports no material findings or corrective actions. Still, extraction confidence is only medium, meaning at least one key document was not fully readable. The contradiction log also shows multiple conflicts across documents on safeguards, FPIC, benefit sharing, leakage justification, and verified ER totals, which reduces reliability.

## Risk Indicators

|                        |                                                      |
|------------------------|------------------------------------------------------|
| ● <b>Additionality</b> | VVB-confirmed investment test                        |
| ● <b>Permanence</b>    | No clear buffer or reversal treatment                |
| ● <b>Leakage</b>       | 0% deduction with negligible justification           |
| ● <b>Baseline</b>      | Project baseline, reassessment not stated            |
| ● <b>Safeguards</b>    | Safeguards present but contradicted in older records |
| ● <b>Double-claim</b>  | Not CORSIA-eligible                                  |

## What Would Improve This Score

→ Publish a reconciled verification note explaining the claimed-versus-verified ER gap and the final accepted issuance basis.

→ Provide a complete, dated safeguards and MRV package covering FPIC, grievance handling, leakage rationale, and reversal treatment.

## Documents Reviewed

- Issuance-Representation-Single-Representor-v4.1 for 192.pdf
- 192-Issuance Representation(201102016).pdf
- VCS\_MR\_Houqiao\_ver 03.0\_clean.pdf
- 230215\_192\_vcs-MR\_v4.2-final\_KS.pdf
- 3.VCS-Listing-Representation-Single-Representor-v4.1for192(Houqiao)signed.pdf
- VCS\_Verification\_Approval\_PRR\_ProjectID\_192\_05\_July\_2023\_.pdf
- 1.VCS-Registration-Representation-Single-Representor-v4.1for192(houqiao)signed.pdf
- Verra-Registry-Communications-Agreement-single-PP-for 192 Houqiao(Both Signed).pdf
- VCS-PD (Houqiao Hydropower Project)091014-ver.1.3.pdf
- Validation Deed of Representation Houqiao.pdf
- VCS-Verification-Representation-v4.1.pdf
- Validation Report Houqiao Final.pdf
- 230627\_VCS-FVerR-Houqiao Hydro MP2\_clean.pdf
- VCS Verification Representation(Houqiao).pdf
- VCSVerificationReportAmendedforHouqiao.pdf

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