QUALITY REPORT

Sirma Run-Of-River Hydro Project

VCS-603 · VCS · Türkiye

Report ID: CM-FF2BA219 · Generated: 2026-04-02 · Scoring Methodology: General v2.0

6.4

Overall Score

out of 10

Integrity (35%)	6.2
Transparency (25%)	6.0
Claim Safety (25%)	6.4
Documentation (15%)	7.4

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

Assessment Summary

This VCS run-of-river hydro project has VVB-confirmed additionality and a consistent claimed-versus-verified ER figure in the latest record, but several cross-document inconsistencies reduce confidence in the underlying narrative. Leakage is treated as negligible with a 0% deduction, and safeguards information appears to have changed materially across monitoring reports, increasing reputational and over-crediting risk.

Project Details

Registry	Verra (VCS)
Registry ID	VCS-603
Sector	renewable_energy
Country	Türkiye
Vintage	Aging
Project Methodology	AMS-I.D 18.0
Crediting Period	2019 — 2029
VVB	Re Carbon Ltd.
Verified ERs	25,064 tCO2e
Monitoring Period	2019 — 2023
Confidence	High
Documents Reviewed	33 documents reviewed
Scored	2026-04-02

Red Flags

■ Key facts change across documents (e.g., leakage treatment, FPIC, safeguards/grievance, crediting period), indicating data reliability issues.

■ Verified ERs conflict between validation reports (25,064 vs 58,070), creating uncertainty about the correct credited volume.

Score Breakdown

Integrity — 6.2 / 10

+ The verification/validation record indicates additionality was confirmed via an investment test.

- Multiple corrective actions in the 2025 monitoring report (e.g., regulatory surplus assessment, methodology applicability, net ER equation) suggest weaknesses in baseline/quantification documentation.

Additionality is relatively strong because the validation/verification documentation indicates an investment test and confirmation by the VVB. Baseline setting is project-specific (per the monitoring record) and relies on a grid emission factor with a stated data year (2018), but the 2025 monitoring report lists several corrective actions (including assessing regulatory surplus and clarifying methodology applicability), which weakens confidence in baseline validity and quantification rigor. Leakage is treated as negligible with a 0% deduction in the 2025 monitoring report, but earlier monitoring documentation indicates leakage was not addressed, which is an integrity-relevant inconsistency. As an avoidance renewable energy project, reversal risk is low and no reversals are reported, but no buffer pool contribution is stated in the extracted record.

Transparency — 6.0 / 10

+ A relatively complete document set is available (PDD, monitoring report, validation report, issuance) with a clearly stated monitoring period (2019-06-07 to 2023-12-31).

- Contradictory statements across monitoring reports on leakage and safeguards reduce MRV clarity and comparability over time.

The extracted record includes key MRV elements such as the monitoring period (2019-06-07 to 2023-12-31), the methodology (AMS-I.D v18.0), the VVB name (Re Carbon Ltd.), and matching claimed and verified ERs in the latest record (25,064). However, transparency is reduced by internal inconsistencies across monitoring reports on whether leakage was addressed and on safeguards/grievance disclosures, making it harder for third parties to track stable MRV assumptions over time. The presence of multiple corrective actions in the 2025 monitoring report also signals that important explanatory content (e.g., net ER equation, applicability conditions) needed improvement to be fully transparent.

Claim Safety — 6.4 / 10

+ The project is explicitly not CORSIA-eligible, lowering aviation-claims and double-claiming exposure.

- Conflicting ER figures across validation reports (25,064 vs 58,070) elevate over-crediting/claims risk until reconciled.

The project is explicitly not CORSIA-eligible, which reduces the risk of high-impact aviation claims and some double-claiming concerns. The largest claim-safety issue is the contradiction in verified ERs between validation reports (25,064 in the 2025-05-29 validation report versus 58,070 in the 2021-09-23 validation report), which creates uncertainty about what volume is supportable for marketing claims. Leakage is asserted as negligible with a 0% deduction in the 2025 monitoring report, but earlier documentation indicates leakage was not addressed; this inconsistency increases perceived over-crediting risk even if leakage is likely small for grid-connected hydro. CCP status is not stated in the extracted record, leaving an eligibility/quality-label gap for buyers who rely on CCP-type signals.

Documentation — 7.4 / 10

+ High extraction confidence and extensive document coverage (25 documents) support auditability.

- Numerous corrective actions in the 2025 monitoring report indicate documentation gaps that required formal fixes.

Documentation coverage is relatively strong: the evidence set includes a PDD, monitoring report(s), validation report(s), and issuance records, with 25 documents used and high extraction confidence. Nonetheless, the 2025 monitoring report includes a substantial list of corrective actions (e.g., adding net ER equations, clarifying methodology applicability, and assessing regulatory surplus), indicating that key sections were incomplete or unclear at the time of review. Several material narrative elements also vary across document vintages (safeguards, grievance mechanism, FPIC, crediting period), which is a documentation quality concern even when documents are available.

Risk Indicators

Additionality	VVB-confirmed investment test
Permanence	Avoidance project; no reversals reported
Leakage	0% deduction; treatment inconsistent across reports
Baseline	Project-specific baseline; documentation fixes required
Safeguards	Safeguards/FPIC disclosures inconsistent over time
Double-claim	Not CORSIA-eligible; CCP status not stated

What Would Improve This Score

→ Publish a clear reconciliation note explaining the 25,064 vs 58,070 ER discrepancy across validation reports and how it maps to issuance/monitoring periods.

→ Provide a consolidated safeguards package (FPIC evidence, grievance mechanism procedure, stakeholder consultation outcomes) and ensure consistent disclosure across monitoring vintages.

Documents Reviewed

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

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