QUALITY REPORT

Kumköy Hydroelectric Power Plant, Samsun

VCS-986 · VCS · Türkiye

Report ID: CM-B79BC9E6 · Generated: 2026-04-02 · Scoring Methodology: General v2.0

5.6

Overall Score

out of 10

Integrity (35%)	5.2
Transparency (25%)	6.1
Claim Safety (25%)	4.6
Documentation (15%)	7.2

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

Assessment Summary

The project has a clear renewable electricity methodology (ACM0002) and additionality is stated as confirmed by the VVB, but several internal inconsistencies across documents reduce confidence. A large gap between claimed and verified emission reductions and unclear/contradictory leakage and crediting-period information elevate over-crediting and claims risk.

Project Details

Registry	Verra (VCS)
Registry ID	VCS-986
Sector	renewable_energy
Country	Türkiye
Vintage	2014
Project Methodology	ACM0002 13.0.0
Crediting Period	2011 — 2021
VVB	RINA Services S.p.A.
Verified ERs	83,484 tCO2e
Monitoring Period	2019 — 2021
Confidence	Medium
Documents Reviewed	24 documents reviewed
Scored	2026-04-02

Red Flags

■ Very large discrepancy between claimed and verified emission reductions (234,277 claimed vs 83,484 verified) across validation documents, indicating potential over-crediting risk or reporting inconsistency.

■ Crediting period is contradictory between the monitoring report (2011–2021) and a later validation report (2021–2031), creating uncertainty about eligibility and vintage boundaries.

■ Leakage treatment is inconsistent: the monitoring report says leakage is not addressed while the validation report says it is quantified, yet the deduction is 0%.

Score Breakdown

Integrity — 5.2 / 10

+ Additionality is confirmed by the VVB using an investment test (validation documentation referenced in the extracted record).

- Leakage is recorded as a 0% deduction with contradictory/missing justification across documents (monitoring report 2022 vs validation report 2023).

The project applies ACM0002 (version 13.0.0) and is an avoidance renewable electricity activity, which generally has low permanence risk; no reversal events are reported (monitoring report 2022). Additionality is stated as confirmed by the VVB using an investment test (validation documentation referenced in the extracted record). However, leakage is problematic: the monitoring report (2022) indicates leakage is not addressed while the validation report (2023) indicates leakage is quantified, yet the leakage deduction is still 0%, which weakens baseline/leakage robustness.

Transparency — 6.1 / 10

+ Monitoring period is clearly stated (2019-04-01 to 2021-03-02) and a specific grid emission factor is provided (monitoring report 2022).

- Claimed vs verified ERs are inconsistent across documents, reducing MRV clarity (validation reports 2019 vs 2023).

Key MRV elements are present, including a defined monitoring period (2019-04-01—2021-03-02) and a stated grid emission factor of 0.53323 (monitoring report 2022). The VVB is identified as RINA Services S.p.A. (extracted record). Transparency is reduced by inconsistent ER figures across validation documents and by missing contextual parameters such as the grid EF year and baseline reassessment timing (not found in the extracted record).

Claim Safety — 4.6 / 10

+ The project is explicitly not CORSIA-eligible, reducing aviation-claim channel risk (extracted registry facts).

- Over-crediting risk signaled by the large ER discrepancy and unclear crediting-period boundaries (validation reports and monitoring report).

The project is explicitly not CORSIA-eligible (extracted record), which lowers the risk of high-impact aviation claims. Nonetheless, the gap between claimed ERs (234,277) and verified ERs (83,484) indicates elevated over-crediting/claims risk and suggests stakeholders could misstate impact if relying on earlier figures (validation reports 2019 vs 2023). Contradictory leakage justification (monitoring report 2022 vs validation report 2023) further increases greenwashing risk because a 0% leakage deduction is harder to defend without consistent documentation.

Documentation — 7.2 / 10

+ A relatively large document set was used (15 documents including PDD, monitoring and validation reports) with high extraction confidence.

- Multiple cross-document contradictions (safeguards, grievance mechanism, benefit sharing, leakage justification, ER totals, crediting period) indicate record reliability issues.

The extracted record indicates 15 documents were used and includes a PDD plus monitoring and validation reports, with high extraction confidence, supporting a solid documentation baseline. No material findings or corrective actions are reported in the extracted record, which is positive for completeness. However, repeated contradictions across documents (safeguards/FPIC/grievance/benefit sharing, leakage justification, ER totals, and crediting period) reduce confidence in the document set’s internal consistency and therefore lower the documentation score.

Risk Indicators

● **Additionality**	VVB-confirmed investment test
● **Permanence**	Avoidance project; no reversals reported
● **Leakage**	0% deduction with inconsistent justification
● **Baseline**	Project-specific baseline; reassessment timing unclear
● **Safeguards**	Safeguards/FPIC and grievance inconsistently reported
● **Double-claim**	Not CORSIA-eligible; CCP status not stated

What Would Improve This Score

→ Publish a reconciled ER table showing claimed vs verified values by monitoring period, with clear explanations for the 234,277 vs 83,484 discrepancy and references to the exact verification/validation sections.

→ Clarify and harmonize the official crediting period across registry, PDD, validation and monitoring reports, including start/end dates and any renewal/extension decisions.

→ Provide a consistent leakage assessment under ACM0002 (including why leakage is 0% if applicable) and ensure the same conclusion appears in monitoring and validation/verification documentation.

Documents Reviewed

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

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