

DECLARATION OF NO DOUBLE COUNTING OF ENVIRONMENTAL ATTRIBUTES

Project Information

Project Name: Primary Carbon Solar PV Grouped Project

Project ID: 5270

Under: Verified Carbon Standard (VCS) Version 4.7, clause 3.23

Project Proponent: Primary Carbon (Pty) Ltd

Project Location: South Africa

Project Type: Solar Photovoltaic (PV) Facilities

Validation/Verification Body (VVB): SustainCert

To whom it may concern,

I, Avesh Padayachee, in my capacity as Founder and CEO of Primary Carbon (Pty) Ltd, hereby declare that:

1. The grouped project shall not seek credit for the same GHG emission reduction under the VCS Program and another GHG program. Any projects issuing GHG credits from different time periods under the VCS Program and another GHG program shall also conform with the rules and requirements in the Registration and Issuance Process.
2. Where activities (PV installations) under the grouped project have received or are seeking credit for reductions from a project activity under the VCS Program and another GHG program, the following information about the other GHG program shall be provided to the validation/verification body and Verra:
 - a. Name and contact information of administrator,
 - b. Details of participation under the program,
 - c. Details of the vintage period(s), volume(s), serial number(s), and all other relevant identification information for emissions reductions and removals included,
 - d. Evidence that the same reductions and removals seeking credit under the VCS Program have not been and will not be counted, used, or credited under the GHG program, or evidence confirming the cancellation and non-use of credits issued under the other GHG program. Such evidence may include:
 - i. A signed letter from the program administrator stating that the same reductions or removals have not and will not be otherwise counted, used, or credited under the other GHG program;
 - ii. A signed letter from the program administrator confirming the cancellation and non-use of GHG program credits for the same reductions or removals seeking credit under the VCS Program; or
 - iii. Links to the official public program registry or project page demonstrating non-issuance or cancellation of credits.



3. PV installations that are registered under another GHG program shall only be eligible for registration under the VCS Program after the date of project inactivity in the other GHG program.
4. PV installations registered under other GHG programs are not eligible for VCU issuance beyond the end of the total project crediting period under those programs.
5. PV installations registered under another GHG program shall be eligible to complete a gap validation and/or register under the VCS Program where the conditions set out in Appendix 2 of the VCS Standard, v4.7, are met.
6. PV installations registered under another GHG program are only eligible for VCU issuance for reductions that occur after the date of project inactivity in the other GHG program.
7. PV installations shall not alter their design during the gap validation process.

In addition to the above, Primary Carbon will comply with any other requirements prescribed by the VCS, with regards to ensuring that there is no double counting or double claiming (for example in the reporting of indirect emissions in company carbon footprints) of environmental attributes associated with the renewable power generated by the activities in the grouped project.

I affirm that the information provided in this declaration is accurate and truthful to the best of my knowledge.

Name: Avesh Padayachee

Designation: CEO

Signature: *Avesh Padayachee*

Date: 2025-08-18

