

Puro Standard, Compliance requirement: 2.1.3 [Additionality](#)

1.2.3. CO2 Removal Supplier shall be able to demonstrate additionality, meaning that the project must convincingly demonstrate that the CO2 removals are a result of carbon finance. Even with substantial non-carbon finance support, projects can be additional if investment is required, risk is present, and/or human capital must be developed. To demonstrate additionality, CO2 removal Supplier must provide full project financials and counterfactual analysis based on Baselines that shall be project-specific, conservative and periodically updated. Suppliers must also show that the project is not required by existing laws, regulations, or other binding obligations.¹⁸

Note: In Puro Standard and related verification, a project specific additionality assessment is required. Puro Standard does not work with automatic additionality criteria or positive lists.

Notice. These answers are public information

#	Additionality	No/yes. If yes, describe	Project response
	Is the project required by existing laws, regulations, or other binding obligations	No	
	Is the Project dependent on carbon finance?	Yes	The Wakefield project is dependent on carbon finance for CAPEX and OPEX. Current operations are not economically sustainable without. See cost analysis
	Is investment required	Yes	Investment in equipment, human resources & distribution channels.
	Is there a need to develop human capital, is there lack of skilled activity locally?	Yes	Wakefield Biochar's Valdosta location is in an Opportunity Zone. The USA Internal Revenue Service considers it to be a low-income/disadvantaged area. Wakefield is making an immediate impact by bringing in green jobs.
	Is your project first-of-its-kind?		
	How is the project economically not feasible without carbon finance?	-----	For example, the application of biochar to local farms in Foley is 100% financed by future carbon finance. For other applications, carbon finance makes up around 50% of total <i>revenue</i> , without which the applications are not profitable. See cost analysis.

	Attach a simple cost analysis and sensitivity analysis.	-----	Attached - confidential
	What are the key variables impacting the cost analysis?	-----	Labour costs, debt servicing costs, operational efficiency, biochar production variables, marketing distribution costs.
	What else is preventing your project implementation? For example, do you have to change industry norms or market practises or to build new infrastructure to carry out the project ?	-----	Significant work must be done to change industry norms to implement changes in material flows. New pyrolysis equipment is needed, which will require new infrastructure depending on the location. Wakefield is investing in building up end user awareness of biochar in order to increase the application. Wakefield is investing time in building up awareness at the corporate level regarding the benefits of pyrolysis.
	What is the baseline activity and related emissions and removals that would occur if this activity did not take place (business-as-usual, counterfactual)?	-----	The following baseline changes are anticipated: New pyrolysis machinery will divert bark and wood chips from landfill or combustion to biochar and divert wood fibre sludge from landfill. It will be pyrolyzed and applied to farms. Bark char that has previously been re-fired in boilers or used as an activated carbon will be processed and deployed on farms or retail use.
	Attach a simple emission and removal analysis.	-----	See LCA

Project signature and date

I hereby declare that all information provided is truthful and precise to the best of my knowledge.



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