PROJECT REVIEW REPORT

This project review report includes findings raised during Verra's review of the project specified below. The VVB must address the findings before the project request can be considered for approval by Verra. The project review report will be made publicly available on the Verra Registry. Confidential information may be provided in separate attachments.

Project ID	3838
Project Name	Plastic Waste Recycling & Improving Waste Picker Livelihoods in Kenya
Review Type	Registration & Verification Approval
Program(s)	Plastic Waste Reduction Program
Verification Period	1 January 2022 – 31 August 2022
Project Proponent	Taka Taka Solution Ltd.
Methodology	PWRM0001 *Plastic Waste Collection Methodology, v1.1* PWRM0002 *Plastic Waste Recycling Methodology, v1.1*
VVB	Carbon Check (India) Private Limited
Assessment Criteria	*Plastic Standard, v1.0*
Date of First Issue	February 22, 2024
Date of Second Issue	May 02, 2024
Date of Third Issue	May 29, 2024
Review Conclusion	Registration and verification approval request approved on June 24, 2024
Date of Final Issue	June 24, 2024

FINDINGS

#	Finding Description	VVB Response	Status
1	Inconsistent, unclear, and missing information		
	Issue 1. Section 1.10 of the project description and monitoring report and Sections 2.1.1 & 2.1.3 of the validation and verification report state 1st Jan 2012 as the start date for the 'Thika' collection instance which is before the project start date of January 01, 2022. 2. The tables in Section 1.9 of the project description and monitoring report state 2021 to 2027 as the crediting period of the project instead of 2022 to 2028. 3. Section 1.2, 1.6, and Appendix 2 of the validation and verification report reference "Plastic Program Validation and Verification Manual". However, this manual does not exist. 4. Section 2.1.1 of the validation and verification report references, "Bogota" and "Barranquilla" in the statement "Further, based on … Bogota as well as Barranquilla…" However, these locations are not unique to the project. 5. The summary section of the validation and verification report, states: "Under this project Taka Taka Solutions Ltd. is collecting 20,693 tons of plastic waste per year through different channels and operating recycling facility with a total operational capacity of 11549 TPA as per the ~~consent order~~ /13/." However, it is unclear whether these amounts are being collected and recycled by the project or they are the estimated	**Round 1** VVB Response 1. PP updated section 1.10 of the Project description and monitoring report to address the issue. 2. PP updated section 1.9 of the Project description and monitoring report to address the issue. 3. VVB had updated the section 1.2, 1.6 and Appendix 2 by removing the Plastic Program Validation and Verification Manual which was wrongaly mentioned. 4. VVB had rectified the locations and updated the section 2.1.1 to address the issue. 5. The quantity mentioned in the summary section of the validation and verification report is the estimated collection and recycling capacity of the project. VVB had modified the section to address the issue. 6. PP updated section 1.12.2 of the Project description and monitoring report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

	collection and recycling capacity of the project. 6. Section 1.12.2 of the project description and monitoring report does not describe energy consumption prior to project initiation. Action Required The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues referenced above. Program Rule(s) Sections 3.5, 3.2.1, 3.6.1-3.6.2, 4.1.14 - 4.1.15, *Plastic Standard, v1.0* *(#Issue 6)* Sections 3.14.9-3.14.13, 4.1.14 - 4.1.15, *Plastic Standard, v1.0* Background As required by Section 3.5.1 of the *Plastic Standard*, the project date must be on or after 1 January 2016. All the project activity instances must have a start date on or after the start date of the project.		

2	**Insufficient stakeholder interviews**		
	Issue Section 1.8 of the validation and verification report states that only one waste collector/aggregator was interviewed by the VVB. It is unclear how interviewing only one waste collector was deemed representative of the 13 collection activity instances. Action Required The VVB must update the validation and verification report to address the issue referenced above. Program Rule(s)	**Round 1** VVB Response Out of the 13 collection centers, ➢ 08 are the Buyback centre where general public use to deposite their waste, ➢ 03 are the MRF centers where waste collector/aggregator use to supply the wate material ➢ 02 are the industrial establishment from where PP use to collect and transport the material to recycling facility. In order to ensure the sufficient representation of all the three catogery of the collection center, following personals were	Closed

	Sections 3.13.4-3.13.15, 4.1.14 - 4.1.15, *Plastic Standard, v1.0*	interviewed: ➢ 01 waste collector/aggregator was interviewed as they are involved in the supply of material to the 03 MRF facilities only, ➢ 03 employes involved in operation of 08 bu yback centers as at these centers general public use to deposit their used plastic under byback scheme run by PP ➢ 01 employ involved in the handling of industrial waste being received by the project VVB has updated Section 1.8 of the validation and verification report to address the issue.	
		Verra Response Section 1.8 of the validation and verification report has been updated to address the finding.	

3	**Missing details of FAR**		
	Issue Section 1.11 of the validation and verification report does not include and describe the FAR raised in Appendix 3. Action Required The VVB must update Section 1.11 of the validation and verification to include the FAR and describe what the VVB must verify during the next verification. Program Rule(s) Sections 4.1.14 - 4.1.15, *Plastic Standard, v1.0*	**Round 1** VVB Response VVB had rectifyied the locations and updated the section 1.11 to address the issue.	Closed
		Verra Response Section 1.11 of the validation and verification report has been updated to address the finding.	

4	Inconsistent and missing information regarding project configuration		
	Issue 1. In Section 2.1.3 of the validation and verification report, VVB states the project configuration as "multiple instances with multiple activities," whereas the project description and monitoring report and other sections of the validation report state it as a grouped project. 2. The assessment of grouped project eligibility criteria is included in Section 2.1.2 of the validation and verification report instead of Section 2.1.3. Action Required 1. The VVB must update Section 2.1.3 of the validation and verification report to consistently state the project configuration. 2. The VVB must update Section 2.1.3 of the validation and verification report to include the assessment of grouped project eligibility criteria. Program Rule(s) Section 3.3, 4.1.14 - 4.1.15, *Plastic Standard, v1.0*	**Round 1** VVB Response 1. VVB updated section 2.1.3 of the validation and verification report to address the issue. 2. VVB updated Section 2.1.3 of the validation and verification report and included the assessment of grouped project eligibility criteria. Verra Response The validation and verification report has been updated to address the finding.	Closed

5	Insufficient information and incomplete assessment of the project's conformance with applicable laws, statutes, and other regulatory frameworks		
	Issue	**Round 1**	

	1. Section 1.13 of the project description and monitoring report does not identify and demonstrate compliance of the project with relevant local, regional and national laws, statutes, and regulatory frameworks (for example, labor and environmental laws) applicable in the project region in addition to obtaining the NEMA licenses. 2. Section 2.1.11 of the validation and verification report: a. does not identify the laws and how the VVB assessed that the project complies with all the applicable laws, statutes, and regulations in the region in which the project operates; and b. references "India's plastic waste management rules" in the VVB's conclusion. <u>Action Required</u> The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues described above. <u>Program Rule(s)</u> Sections 3.1.3, 3.2.1, 3.2.3, 4.1.14-4.1.15, *Plastic Standard, v1.0*	<u>VVB Response</u> 1. PP updated section 1.13 of the project description and monitoring report to address the issue. 2. VVB updated Section 2.1.11 of the validation and verification report to address the issue. <u>Verra Response</u> The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

6	**Missing assessment of additional information relevant to the project**		
	<u>Issue</u>	**Round 1**	

	Section 2.1.12 of the validation and verification report does not provide an assessment of additional information provided by the project proponent in Section 1.14 of the project description and monitoring report. Action Required The VVB must update Section 2.1.12 of the validation and verification report to include the assessment of additional information shared by the project proponent. Program Rule(s) Section 3.2.2, 4.1.14 - 4.1.15, *Plastic Standard, v1.0*	VVB Response VVB updated Section 2.1.12 of the validation and verification report to address the issue. Verra Response Section 2.1.12 of the validation and verification report has not been sufficiently updated to address the finding. Action Required The VVB must update Section 2.1.12 of the validation and verification report to provide an assessment of the commercially sensitive information in Section 1.14 of the project description and monitoring report. **Round 2** VVB Response VVB updated section 2.1.12 of the validation and verification report to provide an assessment of the commercially sensitive information. Verra Response The validation and verification report has been updated to address the finding.	Closed

7	Inadequate information and assessment of stakeholder engagement		
	Issue 1. Section 2.1.2 of the project description and monitoring report does not identify government agencies and companies buying recycled materials, as stakeholders, whereas they were consulted during the stakeholder consultations. 2. Issue #3 in CL #03 in Appendix 3 of the validation and verification report required the project proponent to explain how the identified groups of stakeholders are appropriate as the identified groups excluded stakeholders like local government bodies, village associations, and buyers of recycled pellets. However, it is unclear how the project proponent's response to issue #3 under CL #03 was deemed sufficient to close the finding. 3. Section 2.2.3 of the validation and verification report does not provide an assessment of whether: a. the project's process was appropriate for each stakeholder group; b. information about potential costs, risks and benefits was appropriately shared with each group; c. each group had an opportunity to influence project design; and d. the project dedicated particular attention to optimizing benefits for any marginalized and vulnerable groups. Action Required 1. The VVB must ensure that the project proponent updates Section 2.1.2 of the project description and monitoring report to clarify why government agencies and companies buying recycled materials were not identified as relevant stakeholders.	**Round 1** VVB Response 1. PP updated section 2.1.2 of the project description and monitoring report to address the issue. 2. The Final Validation Report Section 2.2.2 have been updated to incorporate the assessment provided by the VVB in response to Query #3 raised in CL 3, for addressing the closure requirement. 3. VVB updated Section 2.2.3 of the validation and verification report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

	2. The VVB must update Section 2.2.2 of the validation and verification report to clarify how the exclusion of government agencies and companies buying recycled materials as relevant stakeholders was assessed and deemed appropriate and how the project proponent's response to issue #3 in CL #03 was deemed appropriate to close the finding. 3. The VVB must update Section 2.2.3 of the validation and verification report to address the issues referenced above. Program Rule(s) Sections 3.13.1-3.13.3, 4.1.14 - 4.1.15, *Plastic Standard, v1.0*		

8	Inconsistent information and insufficient assessment of Free, Prior and Informed Consent		
	Issue Section 2.1.4 of the project description and monitoring report states no property rights are impacted by the project as the project obtains consent from those whose property rights will be affected by the project in the form of lease licenses, whereas Section 2.2.4 of the validation and verification report states no property rights are impacted by the project as the facility is owned by the project Proponent. Action Required 1. The VVB must ensure that the project description and monitoring report and validation and verification report are updated to consistently state whether and which stakeholder group's property rights are affected by the project activities. 2. The VVB must update Section 2.2.4 of the validation and verification report to identify which stakeholder group's property rights are affected by the project activities and provide an assessment of the same.	**Round 1** VVB Response VVB updated Section 2.1.4 of the validation and verification report to address the issue. Verra Response Section 2.2.4 of the validation and verification report has been updated to address the finding.	Closed

	Program Rule(s) Section 3.13.6, *Plastic Standard, v1.0*		

9	**Insufficient information and inadequate assessment of continued consultation and adaptive management**		
	Issue 1. In Section 2.1.5 of the project description and monitoring report: a. it is unclear how "health checkups, safety counseling, best practices, PRR distribution," etc., serve as modes of continuing consultations; and b. clear information about the project's plan for continued stakeholder consultation and adaptive management for each stakeholder group is not provided. 2. Section 2.2.5 of the validation and verification report does not: a. clarify how the health checkups, safety counseling, best practices, PRR distribution, etc., were deemed appropriate as modes of continuing consultations; b. describe the project's plan for continued consultation and adaptive management and does not provide an assessment of the plan's effectiveness; and c. provide a conclusion as to whether the project's plan for continued consultation allows the project proponent to effectively communicate with and consult all stakeholder groups using an adaptive management approach. Action Required	**Round 1** VVB Response 1. PP updated section 2.1.5 of the project description and monitoring report to address the issue. 2. VVB updated Section 2.2.5 of the validation and verification report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

	The VVB must ensure that the project description and monitoring report and the validation and verification report are updated to address the issues referenced above. Program Rule(s) Section 3.13.9, *Plastic Standard, v1.0* Background As per Section 3.13.9 of the *Plastic Standard,* the project proponent must develop and implement a plan to continue communication and consultation with all stakeholder groups about the project and its impacts to facilitate adaptive management throughout the life of the project. The plan must include measures to enable the meaningful influence of all project stakeholder groups that want and need to be involved in project design, implementation, monitoring, and assessment throughout the project's lifetime.		

10	**Insufficient information and inadequate assessment of feedback and grievance redress procedure & accessibility**		
	Issue 1. Section 2.1.8 of the project description and monitoring report does not describe how the stakeholders are made aware of the existence of the feedback and grievance redress procedure, its contents, and how to use it. 2. Section 2.2.7 of the validation and verification report does not describe how the VVB assessed the project's feedback and grievance redress procedure and its accessibility. Action Required The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues referenced above.	**Round 1** VVB Response 1. PP updated section 2.1.8 of the project description and monitoring report to address the issue. 2. VVB updated Section 2.2.7 of the validation and verification report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

	Program Rule(s) Section 3.13.11-3.13.12, 3.2.1, and 4.1.14-4.14-15, *Plastic Standard, v1.0*		

11	**Inadequate information about and assessment of health and safety and labor safeguards**		
	Issue 1. Section 2.3.1 of the validation and verification report: a. states: "the project activity within the project boundary poses no potential health impacts", whereas the project description and monitoring report identifies potential risks and hazards associated with the project; and b. does not identify and provide an assessment of the potential health impacts, hazards, and safety risks associated with the collection activity of the project. 2. Section 2.3.2 of the project description and monitoring report does not identify and demonstrate compliance with the labor and human rights laws applicable to the project. 3. Section 2.3.2 of the validation and verification report does not identify the labor laws that were considered by the VVB in its assessment of labor safeguards. Action Required The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues referenced above. Program Rule(s) Sections 3.14.2-3.14.3, 3.2.1, 4.1.14-4.14-15, *Plastic Standard, v1.0*	**Round 1** VVB Response 1. PP updated section 2.3.2 of the project description and monitoring report to address the issue. 2. VVB updated Section 2.3.1 & 2.3.2 of the validation and verification report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

12	**Insufficient information and missing assessment of energy efficiency and greenhouse gas emissions savings**

	Issue 1. Section 2.3.3 of the project description and monitoring report does not provide the GHG emission reduction calculations. 2. Section 2.3.3 of the validation and verification report does not provide an assessment of the greenhouse gas emissions savings for collection and recycling activity quantified by the project proponent. Action Required The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues referenced above. Program Rule(s) Sections 3.14.11-3.14.13, 3.2.1, 4.1.14-4.1.15, *Plastic Standard, v1.0*	**Round 1** VVB Response 1. PP updated section 2.3.3 of the project description and monitoring report to address the issue. 2. VVB updated Section 2.3.3 of the validation and verification report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

13	**Inadequate information and assessment of Applicability Conditions of PWRM0001**		
	Issue 1. Section 3.2 of the project description and monitoring report: a. does not describe how the MRF and industrial collection meets the requirements of formal waste sector activity as defined in the collection methodology activity to establish conformance with Applicability Condition 1; b. does not describe the evidence provided to the VVB to confirm the project's conformance with Applicability Condition 2; c. does not describe how the "PLASTEAX database" demonstrated that the sources of collected waste are identifiable and would likely have been left in the environment or burned in the absence of the	**Round 1** VVB Response 1. PP updated the section 3.2 project description and monitoring report to address the issue. 2. VVB updated section 2.4.6 of the validation and verification report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

	project activity to establish conformance with Applicability Condition 3; and d. does not describe the evidence provided to the VVB to establish conformance with Applicability Condition 4. 2. Section 2.4.2 of the validation and verification report: a. does not describe how the VVB assessed the activity's conformance as a formal collection activity to establish conformance with Applicability Condition 1; b. does not describe how the assessment of the "PLASTEAX database" confirmed that the sources of collected waste are clearly identifiable, and are existing or potential sources of plastic waste that would have been left or dumped in the environment or openly burned in the absence of the project activity to establish conformance with Applicability Condition 3; c. does not describe the evidence that was assessed to confirm that the project activity does not compete with other collection activities or include the plastic waste that has been diverted from a historically existing collection activity to establish conformance with Applicability Condition 9; and d. does not describe how reviewing the KML file confirmed the project's conformance with Applicability Condition 11. <u>Action Required</u> The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues referenced above. The VVB must describe the steps taken to confirm that the collection activity conforms with the requirements of each applicability condition referenced above and provide a conclusion of its assessment of		

	the project activity's conformance with each applicability condition. Program Rule(s) Sections 3.2.1, 4.1.14- 4.1.15, *Plastic Standard, v1.1* Section 4, *Plastic Waste Collection Methodology, v1.1*		

14	**Inadequate information and assessment of Applicability Conditions of PWRM0002**		
	Issue 1. Section 3.2 of the project description and monitoring report: a. references "Table 9" under Applicability Conditions 2 and 3. However, Table 9 in Section 2.3.3 describes GHG emission reduction calculation and does not provide information relevant to these applicability conditions; b. does not describe the evidence to confirm waste sources in order to establish conformance with Applicability Condition 2; c. does not describe the evidence that was provided to the VVB to demonstrate conformance with Applicability Condition 5 of the recycling methodology; d. does not describe the evidence that was provided to the VVB to demonstrate conformance with Applicability Condition 6 of the recycling methodology; and e. does not describe the evidence provided to the VVB to confirm that the project activity does not divert plastic waste from any historically existing, legally recognized recycling activity to confirm the project's conformance with Applicability Condition 10.	**Round 1** VVB Response 1. PP updated the section 3.2 project description and monitoring report to address the issue. 2. VVB updated section 2.4.6 of the validation and verification report to address the issue. Verra Response 1. The project description and monitoring report has been updated to address all issues except issue #1c. 2. The validation and verification report has been updated to address all the issues. Action Required The VVB must ensure that the project description and monitoring report is updated to address issue referenced above. Background A project must demonstrate that the plastic waste intended for recycling is not mixed with hazardous materials or substances. This could be demonstrated by providing the list of materials used as recycling input or providing the recycling process description that confirms the input to the recycling process. **Round 2** VVB Response	Closed

	2. Section 2.4.2 of the validation and monitoring report: a. does not describe how the cross-checking of purchasing and selling invoices confirmed the waste sources to establish the project's conformance with Applicability Condition 2; b. does not describe the evidence assessed by the VVB to confirm the project's conformance with Applicability Condition 6; and c. does not describe the evidence assessed by the VVB to confirm that the project activity does not divert plastic waste from any historically existing, legally recognized recycling activity to confirm the project's conformance with Applicability Condition 10. Action Required The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues referenced above. The VVB must describe the steps taken to confirm that the recycling activity conforms with the requirements of the applicability condition referenced above and provide a conclusion of its assessment of the project activity's conformance with the applicability condition. Program Rule(s) Sections 3.2.1, 4.1.14-4.1.15, *Plastic Standard, v1.1* Section 4, *Plastic Waste Recycling Methodology, v1.1*	1. PP updated the section 3.2 project description and monitoring report to address the issue raised in 1c. 2. VVB updated section 2.4.6 of the validation and verification report to provide the assessment of applicability condition 5. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	

15	Insufficient assessment and missing conclusion of project boundary		
	Issue In Section 2.4.3 of the validation and verification report, the VVB does not describe the steps taken to validate the physical locations of the installations or management activities taking place as part of the project activity. Action Required The VVB must update Section 2.4.3 of the validation and verification report to describe the steps taken to validate the physical locations of the installations or management activities taking place as part of the project activity and provide a conclusion of its assessment. Program Rule(s) Sections 4.1.14-4.1.15, *Plastic Standard, v1.0*	**Round 1** VVB Response VVB updated the section 2.4.3 of the validation and verification report. Verra Response The validation and verification report has been updated to address the finding.	Closed

16	Insufficient information and inadequate assessment of baseline scenario for collection and recycling activities		
	Issue Section 2.4.5 of the validation and verification report states: "The assessment team determined that the documentation evidence /13/ was relevant, correctly cited, and interpreted in the project description." However, evidence /13/ in Appendix 1 is “NEMA licenses”. It is unclear how the assessment of “NEMA licenses” helped demonstrate the baseline scenario. Action Required The VVB must update Section 2.4.5 of the validation and verification report to clearly describe the evidence and data sources assessed to establish and confirm the project’s baseline scenario for both the collection and recycling activity. Program Rule(s) Sections 3.9, 4.1.14-4.1.15, *Plastic Standard, v1.0*	**Round 1** VVB Response VVB updated the section 2.4.5 of the validation and verification report. Verra Response The validation and verification report has been updated to address the finding.	Closed

	Section 6, *Plastic Waste Recycling Methodology, v1.1 and Plastic Waste Collection Methodology, v1.1*		

17	**Insufficient information and inadequate assessment of additionality for collection and recycling activities**		
	Issue 1. Section 3.6 of the project description and monitoring report does not provide references or information sources for that "there were no laws until the year 2022 that mandated plastic collection/recycling". 2. Section 3.6 of the project description and monitoring report (under collection additionality): a. calculates penetration rate using total collection capacity as *C* instead of total plastic waste collected in the project region as required by the methodology; and b. does not describe how the values in Table 14 were obtained and does not provide accessible and clear references for each value. 3. Section 3.6 of the project description and monitoring report (under recycling additionality) does not describe how the values in Table 15 were obtained and does not provide accessible and clear references for each value. 4. Section 2.4.6 of the validation and verification report does not: a. describe how the VVB assessed the project proponent's demonstration of regulatory surplus for both collection and recycling activity; b. provide the penetration rate calculation and its assessment for both the collection and recycling activities and material types managed by the project; c. describe how the VVB deemed appropriate the calculation of collection penetration rate with	**Round 1** VVB Response 1. PP updated the section 3.6 project description and monitoring report to address the issue. 2. VVB updated section 2.4.6 of the validation and verification report to address the issue. Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	Closed

	total collection capacity as *C* instead of total plastic waste collected in the project region as *C*; and d. describe the steps taken to assess the "National Guidance for Plastic Pollution Hot spotting and Shaping Action, 2020 Report" and "PLASTEAX database" to confirm that the penetration rate is less than 20%. <u>Action Required</u> The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues referenced above. <u>Program Rule(s)</u> Sections 3.2.1, 4.1.14-4.1.15, *Plastic Standard, v1.0* Section 7, *Plastic Waste Recycling Methodology, v1.1 and Plastic Waste Collection Methodology, v1.1* <u>Background</u> The project proponent must assess the penetration rate of the project activity in the relevant region for all the material types managed by the project activity in accordance with the requirements in Step 3a, Section 7 of the methodologies. The project description and monitoring report must clearly provide the data, data sources, and any assumptions made to calculate the penetration rate, and calculate the penetration rate using the formula prescribed by the methodology.		

18	**Quantification of collected and recycled plastic waste**		
	<u>Issue</u>	**Round 1**	

	1. Section 4.2 of the project description and monitoring report does not describe the procedure for quantification of project collected and recycled plastic waste in accordance with the applied methodology. 2. Section 4.3 of the project description and monitoring report states: “Since it is a new project, the baseline is 0, so the net collected and recycled plastic waste is the same as in Section 4.2." However, Section 4.2 of the report doesn't provide any amounts. 3. In Section 4.3 of the project description and monitoring report: a. the sum of amounts for the years 5, 6, and 7 presented in Table 15a are inconsistent with the sum of individual material type amounts; b. the sum of amounts for year 2 in Table 15a is rounded up instead of rounding down; c. the totals for PP and HDPE material types are inconsistent with the sum of amounts for individual years in Table 15b; and d. does not provide the respective Appendix reference where the instances-wise and material type breakdown tables for collection activity are presented. 4. Section 7.1 of the project description and monitoring report does not provide the sorting output value in the sorting output parameter table. 5. Section 7.5 of the project description and monitoring report states an “error factor” applied for the month of April for the Dandora collection instance. However, it is unclear how this error factor was determined. Additionally, the VVB does not provide an assessment of the same in the corresponding section of the validation and verification report.	<u>VVB Response</u> 1. PP updated the section 4.2. 4.3 7.1 and 7.5 of the project description and monitoring report to address the issue. 2. VVB updated relevent section of the validation and verification report to address the issue. <u>Verra Response</u> 1. The project description and monitoring report has been updated to address issues #1 and #2. 2. The project description and monitoring report has not been updated to address issues #3, #4, and #5. 3. (For issue#6) Section 7.5 of the project description and monitoring report has been updated to state that the inventory of 1085 tonnes of the collected plastic waste amount is beingconsidered for collection credits. However, if the collected plastic waste has not reached an eligible end destination as per Applicability Condition 7 of the collection methodology it will not be eligible for collection credits. <u>Action Required</u> 1. The VVB must ensure that the sum of amounts provided in Tables 15a and 15b in Section 4.3 of the project description and monitoring report are consistent with the sum of individual amounts. Accordingly, the VVB must update the tables provided in Section 2.4.7 of the validation and verification report and ensure that the amounts are consistently presented in all sections of the reports. 2. The VVB must ensure that sorting output value provided under sorting output parameter table in Section 7.1 of the project description and monitoring report is consistent with the values provided in Table 18 of the project description and monitoring report and	Closed

	6. Section 7.5 of the project description and monitoring report, states 1111 Tons of collected plastic waste as inventory for future recycling. However, it is unclear whether this amount is being included in the quantification of net collected plastic waste and whether credits are being claimed for the amount stored in inventory. Action Required 1. The VVB must ensure that the project description and monitoring report and validation and verification report are updated to address the issues described above. Also, the quantification of the project collected plastic waste must be updated throughout the project description and monitoring report and Section 4 of the validation and verification report to ensure they are stated consistently, as needed, and the VVB must provide an assessment of the same. 2. Issue #6: The VVB must ensure that the project proponent updates Section 7.5 of the project description and monitoring report to clarify whether credits are being claimed for collected plastic waste amount stored in inventory and update the project description and monitoring report as needed to include only the plastic waste amounts that were transferred to an end destination eligible under the Applicability Condition 7 of the *Plastic Waste Collection Methodology, v1.1*. Program Rule(s) Sections 3.2.1 and 3.2.3, *Plastic Standard, v1.0* Background (Issue #6) Under the *Plastic Waste Collection Methodology, v1.1*, plastic waste is not considered to be "collected" unless it is or has	Section 2.4.10 of the validation and verification report. 3. The VVB must ensure that Section 3.2.1 of the validation and verification report is updated to provide an assessment for the "error factor" as applied and stated in Section 7.5 of the project description and monitoring report. 4. The VVB must ensure that the project proponent updates Section 7.4 and 7.5 of the project description and monitoring report to include only the collected plastic waste amounts that were transferred to an end destination that is eligible under the Applicability Condition 7 of the *Plastic Waste Collection Methodology, v1.1.* The quantification of the project collected plastic waste must be updated throughout the project description and monitoring report and validation and verification report to ensure they are stated consistently, as needed, and the VVB must provide an assessment of the same. Background (Issue #4) Under the *Plastic Waste Collection Methodology, v1.1*, plastic waste is not considered to be "collected" unless it is or has been transferred to one of the appropriate end destinations defined in Applicability Condition 7 during the project monitoring period. The plastic waste stored in inventory is not an eligible end destination for the collected plastic waste, and such amounts cannot be considered eligible for Waste Collection Credits (WCC's). Also, credits cannot be claimed for stored materials in the next monitoring period. **Round 2** VVB Response 1. PP updated the respective sections of project description and monitoring report to address the issues as follows:	

	been transferred to one of the appropriate end destinations defined in Applicability Condition 7. The plastic waste stored in inventory is not an eligible end destination for the collected plastic waste, and such amounts cannot be considered eligible for Waste Collection Credits (WCC's).	a. the tables 15a and 15b in section 4.3 to make consistency in the sum of amounts with the sum of individual amounts. b. section 4.3 to provide the Appendix reference where the instances-wise and material type breakdown tables for collection activity are presented c. section 7.1 to provide the sorting output value in the sorting output parameter table. d. section 7.5 to provide the calculation used for the determination of the "error factor". 2. VVB updated the respective sections of validation and verification report to address the issues as follows: a. the tables in section 2.4.7 to ensure that the amounts are consistently presented. 1. the tables in section 2.1.0 to ensure that the amounts are consistently presented. c. section 3.2.1 to provide an assessment for the "error factor" as applied PP is not considering the quantity of PET type material kept as inventory for the collection credit. These materials are being stored at the recycling facility, awaiting the installation of machinery capable of processing PET plastics.	
		<u>Verra Response</u> 1. The project description and monitoring report and the validation and verification report have been updated to address all the issues. However, there is an inconsistency in the total collected plastic waste amounts in Table 15a and instance-wise tables in Appendix 8.7. 2. Section 1.2 of the project description and monitoring is updated to exclude PET as a material type managed by the project. However, in Section 4.3 of the project description and monitoring report, PET is included as a material type for which the collection amount is estimated, indicating it is included in the project's scope. <u>Action Required</u>	

		1. The VVB must ensure that the project description and monitoring report is updated to consistently present the collected plastic waste amount in Table 15a and instance-wise tables in Appendix 8.7. Accordingly, the VVB must update the tables provided in Section 2.4.7 of the validation and verification report and ensure that the amounts are consistently presented in all sections of the reports. 2. The VVB must ensure that the project description and monitoring report is updated to include all the material types managed by the project in Section 1.2.	
		Round 3 VVB Response 1. PP updated the project description and monitoring report to address the following issues: a. To make consistency in the collected plastic waste amount in Table 15a and instance-wise tables in Appendix 8.7. b. Section 1.2 of project description and monitoring report to include the PET material type managed by the project. 2. VVB updated the section 2.4.7 of validation and verification report to make consistency in quantity presented in the table.	
		Verra Response The project description and monitoring report and the validation and verification report have been updated to address the finding.	

19	**Unclear information and inadequate assessment of data and parameters monitored**

	Issue 1. Section 5.2 of the project description and monitoring report: a. does not include the purpose of the parameters in line with the applied methodology; b. does not include the end-destination of non-recycled plastic waste in the end-destination of non-recycled plastic waste parameter table; and c. states: "total loss after sorting and washing = 592 tonnes and Total loss after pelletizing = 194 tonnes". However, it is unclear what these losses mean and how they were handled. 2. Section 2.4.10 of the validation and verification report does not provide an assessment of the data and parameters monitored. Action Required The VVB must ensure that the project description and monitoring report and the validation and verification report are updated to address the issues described above. Program Rule(s) Sections 3.2.1, 3.2.3, 4.1.14 - 4.1.15, *Plastic Standard, v1.0* Section 9.2, *Plastic Waste Recycling Methodology, v1.1* Background (Issue #1b) Non-recycled plastic waste is not required to be quantified but the end-destination of the non-recycled plastic waste must be specified in the parameter table for demonstrating compliance with Applicability Condition 11 of the methodology.	**Round 1** VVB Response 1. PP updated the section 5.2 of the project description and monitoring report to address the issue. 2. VVB updated section 2.4.10 of the validation and verification report to include the assessment on the data and parameters monitored. Verra Response The project description and monitoring report have been updated to address the finding.	Closed

20	**Missing information and assessment of start date of collection activity.**

	Issue Section 1.7 of the project description and monitoring report and Section 2.1.6 of the validation and verification report do not provide clear information regarding the project's collection activity start date. Action Required The VVB must ensure that the project description and monitoring report and the validation and verification report are updated to address the issues described above. Program Rule(s) Section 1.7, *Joint Plastic Program Validation and Verification Report Template, v1.0* Sections 2.1.6, *Joint Plastic Project Description and Monitoring Report Template, v1.0*	**Round 1** VVB Response 1. PP updated section 1.7 of the project description amd monitoring report to address the issue. 2. VVB updated section 2.1.6 of the project validation and verification report to address the issue. Verra Response The project description and monitoring report have been updated to address the finding.	Closed

21	**Missing assessment conclusion for quality of evidence to determine collected plastic waste**		
	Issue Section 3.2.2 of the validation and verification report does not provide a conclusion of its assessment for the quality of evidence to determine collected plastic waste. Action Required The VVB must update Section 3.2.2. of the validation and verification report to provide an overall conclusion with respect to the quantity and quality of the evidence used to determine the amount of both collected and recycled plastic waste. Program Rule(s) Section 4.1.15, *Plastic Standard, v1.0*	**Round 1** VVB Response VVB updated section 3.2.2 of the validation and verification report to address the issue. Verra Response The validation and verification report has been updated to address the finding.	Closed

22	**Missing information in validation and verification conclusion**		
	Issue	**Round 1**	

	1. In Section 4 of the validation and verification report: a. the assessment of whether the data and information supporting the assertion of plastic waste collected and/or recycled were hypothetical, projected, and/or historical in nature, is missing; b. tables summarizing the total verified collected and recycled plastic waste are not provided. c. instance-wise tables for net collected plastic waste are not provided; and d. unrounded amounts are presented in the calculation summary tables. Action Required 1. The VVB must update Section 4 of the validation and verification report: a. to provide an assessment of whether the data and information supporting the assertion of plastic waste collected and/or recycled were hypothetical, projected, and/or historical in nature; b. to provide summary tables for the total amounts of net collected and recycled plastic waste; c. to provide instance-wise tables for net collected plastic waste (in an appendix if they cannot be included in the main body); and d. to round down the amounts in the material-type summary tables. Program Rule(s) Sections 4.1.14-4.14.15, *Plastic Standard, v1.0*	VVB Response VVB updated section 4 of the validation and verification report to address the issue and instance-wise quantity for net collected plastic waste are provided in the Appendix 5 Verra Response Section 4 and Appendix 6 of the validation and verification report is updated to address the finding.	Closed