Plastic Waste Reduction Standard
A VERRA STANDARD

PUBLIC COMMENTS

Project Title	Mr. Green Africa & Removall: Plastic waste reduction project in Kenya
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Project Proponent	MGA GROUP B.V. Removall SAS
VVB	-

Comment 1

Submitted by: Richard Kainika

Organization: Kenya Association of Waste Recyclers

Country: Kenya

Comment:

Lack of additionality

- Both PET plastic bottles as well as HDPE blow & PP injection containers have a recycling rate well above 20%. Based on industry estimates recycling rates for these fractions are in the range of 40-60%.

- Many public studies, unfortunately, do not always go to the required granularity by plastic type. However, various studies do confirm the high recycling rates. See for example page 36 and 42 of this UNIDO report (since the publishing of this report additional companies have opened, further increasing the recycling rate):https://www.unido.org/sites/default/files/files/2022-01/Plastic_value_chain_in_Kenya.pdf

- Producer Responsibility Organizations (PROs) in Kenya, like KEPRO, have established different subsidy rates for different plastic materials based on their current level of recycling in their EPR fee guides. Both PET bottles and HDPE blow as well as PP injection receive the lowest subsidies due to their high recycling rates.

- Mr. Green Africa already pays 20% more than competing waste recyclers for its materials. This shows that the materials are not additional.

Comment 2

Submitted by: Richard Kainika

Organization: Kenya Association of Waste Recyclers

Country: Kenya

Comment:

Negative impact on the recycling space in Kenya

- Already in today's market Mr. Green Africa is known to be paying higher prices than other recyclers, thereby threatening the livelihoods of their competitors, majorly the small-scale informal recyclers, this is attributed to its plastics collection and recycling partnerships with some multinational brands. It is common knowledge within the informal recyclers fraternity that MGA targets to wipe them all from business, as their representative and servant I feel it

important for MGA to engage the collection market more sustainably in line with the UNEA call to a just transition for the informal players, leaving no one behind

- Receiving plastic credits would only aggravate this situation, leading to a large-scale shutdown of many recyclers in Kenya.