# 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.

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| **Project ID** | 4949 |
| **Project Name** | Mister Green Africa & Removall: Plastic waste reduction project in Kenya |
| **Review Type** | Registration Approval |
| **Program(s)** | Plastic Waste Reduction Program |
| **Project Proponent** | MGA GROUP B.V.<br>Removall SAS |
| **Methodology** | PWRM0001 *Plastic Waste Collection Methodology, v1.1*<br>PWRM0002 *Plastic Waste Recycling Methodology, v1.1* |
| **VVB** | Control Union Certifications |
| **Assessment Criteria** | *Plastic Standard, v1.0* |
| **Date of First Issue** | December 13, 2024 |
| **Date of Second Issue** | February 25, 2025 |
| **Date of Third Issue** | May 01, 2025 |
| **Review Conclusion** | Registration approved |
| **Date of Final Issue** | June 09, 2025 |

## FINDINGS

| # | Finding Description | VVB Response | Status |
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| 1 | **Description of the Project Activity** | | |
| | Issue<br>1. Section 1.1 of the project description report states: "In Kenya, only 8% of plastic waste gets collected for ensuring an appropriate end-of-life' whereas on p.22 of the WWF report it is stated that 27% of the waste generated in Kenya is collected.<br>2. The data source for the "…465,000 tonnes of mismanaged plastic waste per year" in Section 1.1 of the project description is not provided.<br>3. Section 1.10 of the project description states: "The collection framework includes central aggregation hubs, fixed collection points, and mobile collection services." and "For its consumer ecosystem, MGA has also established buy-back centres throughout the country", but does not describe the buy-back centres and mobile collection service methods of collection.<br><br>Action Required<br>1. The VVB must update the project description to address the issues referenced above.<br>2. (Issue #3) The VVB must ensure that the project proponent updates the project description to:<br>a. clearly provide information on all methods of plastic waste collection activities, including a description of the various organizations, communities and other entities and how they are involved;<br>b. a description of the waste source(s) for each | **Round 1**<br>VVB Response<br>Project description have been updated by the project proponent to address all issues referenced.<br><br>1. 'The WWF report states that 27% of the waste generated in Kenya is collected. However, the WWF report also states that only 8% of plastic waste is well managed. The other 92% is either openly burnt, dumped in illegal dumpsites or left into the environment. Therefore only 8% of plastic waste gets collected for ensuring an appropriate end-of-life.<br>2. The data source was a scientific study older than 3 years old. This has been replaced by 903,974 tonnes per year, mentioned in the WWF report from 2022 (page 16).<br>3. 'Mobile collection service was only at the pilot phase that was not conclusive. It was never active as waste aggregators were bringing waste directly to MGA. Therefore it has just been removed from the project description. A phrase was added to describe the buy-back centres as shown in Figure 8 of the project description<br><br>Verra Response<br>Project description has been updated to address the issues. | Closed |

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| | of the plastic waste collection methods within the project boundary.<br>c. a description of the end-of-life of the collected plastic waste (e.g., mechanical recycling); and<br>d. a description of the infrastructure, systems and equipment involved in collection activities.<br><br>Program Rule(s)<br>Section 3.2.1, *Plastic Standard, v1.0* | | |

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| **2** | **Public Comments** | | |
| | Issue<br>1. Section 1.10 of the validation report under comment 2:<br>a. does not describe whether and how the VVB assessed whether the project activity is threatening the livelihoods of the small-scale informal recyclers by paying higher prices for collected plastic waste and "MGA targets to wipe them all from business" as claimed in the public comment;<br>b. states: "Interviews with the interested stakeholders revealed a major concern which has to do with pricing". However, it is unclear who were these interested stakeholders who were interviewed;<br>c. does not describe whether the stakeholders who made the comments were interviewed and provide the details of the interview;<br>d. states: "Through interviews with waste pickers and suppliers, it was determined that | **Round 1**<br>VVB Response<br><br>1. Section 1.10 of the validation report under comment 2 have updated to address all issues raised.<br>2. Section 2.2 of the project description have been revised to state the public comment period dates.<br><br>Verra Response<br>1. The VVB states that the focus of the interviews to assess the elimination of income generating activities was "more on highly interested (Kenya Association of Waste Recyclers) and marginalized stakeholders (Local communities, Informal Suppliers, etc)." However, it is unclear if any small-scale recyclers were interviewed.<br>2. In response to issue #1c, VVB has provided details of the stakeholders who made the comments who were | Closed |

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| | there is no structured system in place for determining the pricing of plastic waste in Kenya, making it an open market for the highest bidder to determine the market price and source the most waste. MGA therefore set in motion a more structured and fair pricing system ensuring all pickers and suppliers are adequately renumerated." but does not provide the details of the project proponent's pricing system and how the VVB assessed and determined the fairness of their pricing system; and<br>e. does not describe how the VVB assessed that the project does not eliminate any existing income-generating activities based on the interviews with the project proponent and MGA management.<br>2. Section 2.2 of the project description does not state the public comment period dates.<br><br>Action Required<br>The VVB must ensure that the project description and validation report are updated to address the issues referenced above.<br><br>Program Rule(s)<br>Sections 3.2.1, 3.13.18. 4.1.14, *Plastic Standard, v1.0*<br><br>Background<br>The project documents must sufficiently address the public comments. If any of the comments are based on public perception, the project documents must clearly describe why | interviewed; however, the details of the interview are not provided.<br>3. It is stated in the VVB's response that "The essence of evaluating the elimination of income-generating activities of the project was to compare the benefits generated against the economic impact of its operational activities on other similar establishments." However, it is unclear which "other similar establishments" are being referred to here and does not provide their details.<br>4. The project description has been updated to address issue #2.<br><br>Action Required<br>The VVB must ensure that the validation report is updated to address the issues referenced above.<br><br>**Round 2**<br>VVB Response<br>VVB has updated the validation report to address the issues referenced above.<br>Verra Response<br>1. Section 1.10 of the validation report has been updated to address issues #1-2. It is stated that: "The organization, through Richard Kainika, explained during the interview that MGA buys directly from the pickers, cutting off the aggregators and threatening their business." However, the project does not provide an assessment of whether there is any loss of employment due to threatening of aggregators businesses and whether it is greater than creation of employment as a result of the project and does not | |

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| | that is the case, and whether and how the project plans to address a negative perception or demonstrate their irrelevance.<br>The VVB must provide a clear assessment of how the comments were addressed or provide an assessment of their irrelevance, as applicable. If the comments involve a particular stakeholder or stakeholder group, the VVB must interview the stakeholders to understand their perspective and provide a clear assessment of the same along with a summary of the interview. | describe the situation and justifies it in the project description as required by Section 3.14.8 of the *Plastic Standard.*<br>2. Section 1.10 of the validation report has been updated to state that: "The essence of evaluating the elimination of income-generating activities of the project was to compare the benefits generated against the economic impact of its operational activities on other waste recycling companies (e.g., EcoPost, Vintz Plastics Limited , Limu Plastic Recyclers Ltd, Pure Planet Recyclers Ltd, PETCO Kenya." However, the statement is unclear. Additionally, it is unclear how comparing the benefits generated against the economic impact of its operational activities on other waste recycling companies is relevant to assessing that project did not eliminate income generating activities of any entities.<br><br>Action Required<br>The VVB must ensure that the project description and validation report are updated to address the issues referenced above.<br><br>**Round 3**<br>VVB Response<br>1. The project descrtiptiom report have been updated by the project proponent to address whether there is loss of employment by its activities due to threatening of aggregators businesses or if its activities has impacted greater creation of employment.<br>2. The comparative assessment on elimination of | |

**Commented [VA1]:** Could you point us towards the sections in the project description where the updates in response to this issue have been made by the project proponent? Additionally, the VVB must provide an assessment of those updates in Section 1.10 of the validation report.

**Commented [DB2R1]:** Verra Comments 1. Could you point us towards the sections in the project description where the updates in response to this issue have been made by the project proponent?

VVB Response: Information required can found in sections 2.1.2 and 2.3.2 of the project description report

Verra Comment 2: Additionally, the VVB must provide an assessment of those updates in Section 1.10 of the validation report.

Assessment of updates has been highlighted in section 1.10 of the validation report

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| | | income-generating activities has been carried against Kenya Association of waste recyclers as claims where made during the public comments period by this entity and was deemed relevant by the VVB to evaluate such claim.<br><br>Verra Response<br><br>The issues have been addressed. | |

| 3 | Project configuration | | |
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| | Issue<br>Section 2.1.3 of the validation report states that: "the project has two plastic waste collection and recycling facilities…" while Section 1.3 of the project description states that there are 5 collection centres and 1 recycling facility;<br><br>Action Required<br>The VVB must ensure that the validation report is updated to address the above issues.<br><br>Program Rule(s)<br>Sections 3.3.13, 4.1.14, *Plastic Standard, v1.0* | **Round 1**<br>VVB Response<br>VVB have updated that the validation report to address the referenced issue.<br><br>Verra Response<br>The issue has been addressed. | Closed |

| 4 | Project Start Date | | |
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| | Issue<br>Section 1.7 of the project description does not describe the evidence provided to the VVB to justify the start date for the project.<br><br>Action Required<br>The VVB must ensure that the project description is updated to address the issue described above. | **Round 1**<br>VVB Response<br>VVB have ensured project description updated by the project proponent to address the issue described.<br><br>Verra Response<br>The project description has been updated to address the issue. | Closed |

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| | Program Rule(s)<br>Sections 3.5, 3.2.1, *Plastic Standard, v1.0* | | |

| 5 | Project ownership | | |
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| | Issue<br>Section 1.6 of the project description does not describe the evidence provided to the VVB to demonstrate project ownership.<br><br>Action Required<br>The VVB must ensure that the project description is updated to consistently describe the evidence provided to demonstrate the ownership of the project.<br><br>Program Rule(s)<br>Sections 3.4, 3.2.1, *Plastic Standard, v1.0* | **Round 1**<br>VVB Response<br>Project description has been updated by the project proponent to consistently describe the evidence provided to VVB in demonstrating ownership of the project.<br><br>Verra Response<br>The project description has been updated to address the issue. | Closed |

| 6 | Project Location | | |
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| | Issue<br>The coordinates of project activity instances stated in Section 1.11 of the project description and Section 2.1.10 of the validation report are inconsistent.<br><br>Action Required<br>The VVB must ensure that the project description and validation report are updated to consistently reference the coordinates.<br><br>Program Rule(s)<br>Sections 3.4, 3.2.1, *Plastic Standard, v1.0* | **Round 1**<br>VVB Response<br>The coordinates of project activity instances stated in Section 1.11 of the project description and Section 2.1.10 of the validation report have been aligned.<br><br>Verra Response<br>The project description and validation report have been updated to address the issue. | Closed |

| 7 | Compliance with applicable laws, statutes and regulatory frameworks |
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| | Issue<br>1. Section 1.13 of the project description does not identify and demonstrate compliance of the project with relevant local, regional and national laws, statutes and regulatory frameworks (for example, labor laws) applicable in the project region.<br>2. Section 2.1.11 of the validation report does not provide adequate detail about whether and how the VVB assessed that the project complies with all the applicable labor laws, statutes and regulations in the region in which the project operates.<br><br>Action Required<br>The VVB must ensure that the project description and validation report are updated to address the above issues.<br><br>Program Rule(s)<br>Sections 3.1.3, 3.2.1, and 4.1.14, *Plastic Standard, v1.0* | **Round 1**<br>VVB Response<br>1. Has been updated by the proponent in the project description.<br>2. The VVB have updated validation report to address all issues raised.<br><br>Verra Response<br>1. The project description has been updated to address issue #1. However, it does not state how the project complies with "International Labour Organisation Regulations " and "Regulation of Wages (General) Order 1982".<br>2. The laws and regulations listed in the project description and validation report are inconsistent. For example, Labour Relations Act (2007), Work Injury Benefits Act, 2007, The National Solid Waste Management Strategy 2015 (NEMA), and many others listed in the project description are not mentioned in the validation report.<br><br>Action Required<br>The VVB is requested to address the issues referenced above.<br>**Round 2**<br>VVB Response<br><br>VVB has addressed the issues referenced above<br><br>Verra Response<br>The finding has been addressed. | Closed |

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| 8 | **Stakeholder Identification and Description** | | |
| | Issue<br>1. Section 2.1.2 of the project description:<br>*a.* states: "MGA works with a large network of informal waste workers which are employed to collect plastic waste in exchange for a remuneration. This mainly concerns the informal waste workers and waste aggregators paid for collecting waste and bringing it to aggregation hubs." However, it is unclear whether the project employees the waste workers or buys the waste from them. If the project only buys the waste from the waste workers without any other engagement, it is unclear how that part of the collection activity meets the stakeholder engagement and safeguard requirements of the *Plastic Standard;*<br>b. does not provide specific information about the local authorities, local communities, recyclers, main plastic producers stakeholder groups, (e.g., who makes up this stakeholder group and their relevance to the project.); and<br>c. does not identify small scale informal recyclers and Kenya Association of Waste Recyclers (highlighted in the public comments) as stakeholder groups and describe their relevance to the project.<br>2. Sections 2.2.1 and 2.2.2 of the validation report provide inadequate assessment of project's stakeholder identification approach and stakeholder description. It is unclear how the exclusion of small-scale informal recyclers and Kenya Association of Waste Recyclers as stakeholders was deemed appropriate by the VVB and how the VVB assessed the inadequate description and the roles of the | **Round 1**<br>VVB Response<br>a.The project description report has been updated to address all issues referenced.<br>b. This has bee updated. Recyclers changed to Direct employees. Main Plastic Producers list termed as confidenfidentila. List was observed during the audit.<br>c. This has been explained.<br>2. The validation report has been updated to address this.<br><br>Verra Response<br>1. Issue #1 has been resolved. However, "Local Communities", referenced as one of the stakeholders in Section 2.1.2 of the project description is not included as a stakeholder in the validation report and "Small-scale informal recyclers" referenced as a stakeholder in Section 2.2.2 of the validation report is not included in the project description.<br>2. Sections 2.2.2 and 2.2.3 of the validation report do not describe how the exclusion of Kenya Association of Waste Recyclers as stakeholders was deemed appropriate by the VVB.<br><br>Action Required<br>The VVB must ensure that the stakeholders are consistently identified and referenced in both the project description and validation report.<br>**Round 2** | Closed |

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| | local authorities, local communities, recyclers, main plastic producers stakeholder groups, (e.g., who makes up this stakeholder group and their relevance to the project.).<br><br>Action Required<br>The VVB must ensure that the project description and the validation report are updated to address the issues referenced above.<br><br>Program Rule(s)<br>Sections 3.13.1-3.13.3, 4.1.14, *Plastic Standard, v1.0*<br><br>Background<br>Per Sections 3.13.1-3.13.3 of the *Plastic Standard, v1.0, a* stakeholder is any person or entity who can potentially be affected by the project. In the identification of stakeholders, it is permitted to consider the significance of user populations and how deeply affected they may be by the project such that distant or intermittent user groups who will be affected in very limited ways by the project need not be defined as stakeholders. | VVB Response<br><br>The stakeholders have been consistently identified and referenced in both the project description and validation report.<br><br>Verra Response<br>1. Issue #1 has been addressed.<br>2. Sections 2.2 and 2.3 of the validation report have been updated to provide the details of the interviews with the Kenya Association of Waste Recyclers. However, the VVB has not described why it has not been identified as a stakeholder in Sections 2.1.1 and 2.1.2 of the project description<br><br>Action Required<br>The VVB must updated the validation report to describe why Kenya Association of Waste Recyclers has not been included as a stakeholder in the project description and how they deemed appropriate their exclusion as a relevant stakeholder. The VVB must ensure that the project description is updated as needed.<br><br>**Round 3**<br><br>VVB Response<br>2.1.1 and 2.1.2 of the project description have been updated to reflect the inclusion of Kenya Association of Waste Recyclers as required in 3.13.1 of the *Plastic Standard, v1.0* | |

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| | | Verra Response<br>The issue has been addressed. | |

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| 9 | **Stakeholder Consultation** | | |
| | Issue<br>1. Section 2.1.3 of the project description does not:<br>a. describe the consultations held with all identified stakeholder groups, specifically including "local authorities, local communities, recyclers";<br>b. does not provide the details of the stakeholder groups who attended the consultation on March 06, 2024;<br>c. does not describe whether any consultations other than the one in Nairobi were held in the other project locations; and<br>d. describe whether and how the project design has been affected by stakeholder input and any special attention paid to optimizing benefits for any marginalized and/or vulnerable groups.<br>2. Section 2.2.3 of the validation report:<br>a. provides an insufficient assessment of the stakeholder consultation with all the identified stakeholder groups and at all the locations of the project;<br>b. states: "Control Union reviewed these minutes, pictures with timestamp and presentations recorded during those meetings for sample of the locations where these activities took place." However, it is unclear sampling of which locations is being referred to here as the project description states that the | **Round 1**<br>VVB Response<br>1. Section 2.1.3 of the project description have updated to address issues (a), (b), (c) & (d)<br>2. Section 2.2.3 of the validation report have been updated to address issues referenced.<br><br>Verra Response<br>1. Issue #1 has been addressed.<br>2. Issues #2a-d, and f have been addressed.<br>3. Issue #2e has not been addressed. Additionally, it is unclear what "misidentifying" means in the statement: "For instance,...misidentifying contributors for their child referral pathway program in keeping children from plastic waste collection activities" in Section 2.2.3 of the validation report.<br><br>Action Required<br>The VVB must update the validation report to address the issues referenced aboe.<br>**Round 2**<br>VVB Response | Closed |

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| | consultation was only held in Nairobi in March 2024;<br>c. includes an unclear statement: "However, an interested stakeholder (small recyclers) who opposes the project's claim as additional and also debunks projects as having a positive impact on the recycling system in Kenya was not consulted because basis of the assertion and report of reference could not be verified and project was able to provide objective affirming its response to all refuted claims by this entity." It is unclear whether and what efforts were made by the VVB to interview or consult with these stakeholders to assess their claims. It is unclear what is the "basis of the assertion" that is being referenced above how the project affirming the claims of this entity was considered sufficient to not pursue this further;<br>d. does not describe whether the stakeholder who submitted public comments (i.e., Kenya Association of Waste Recyclers) was interviewed by the VVB;<br>e. states: "Each county had its own stakeholder engagement requirements for its community initiatives and in turned out those became the prerequisite of the project." However, the project description does not describe the country specific engagement requirements.<br>f. does not describe how the VVB assessed whether and how the project design has been affected by stakeholder input and any special attention was paid to optimizing benefits for any marginalized and/or vulnerable groups.<br><br>Action Required<br>The VVB must ensure that the project description and the | The validation report have been updated by the VVB to address the issues referenced above.<br><br>Verra Response<br>The finding has been addressed. | |

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| | validation report are updated to address the issues referenced above.<br><br>Program Rule(s)<br>Sections 3.13.4-3.13.5, 3.2.1, 4.1.14, *Plastic Standard, v1.0* | | |

| 10 | Free, Prior, and Informed Consent | | |
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| | Issue<br>1. Section 2.1.4 of the project description states: "No property rights are impacted by any of MGA's collection and recycling instances." whereas validation report states: "The VVB confirmed that MGA had obtained consent either written and/or verbal from the project partners and other stakeholder groups whose property (rights) may have been affected by the project activity although there was no evidence gathered or recorded of such instances." making it unclear whether and which stakeholder group's property rights are affected by the project activity.<br>2. Section 2.2.4 of the validation report:<br>a. does not describe who were the stakeholder groups "whose property (rights) may have been affected by the project activity".; and<br>b. states that consent has been given by the county offices as authorization for collection activities to be carried out within that county and also describes the engagement process in each county, whereas no details about this have been provided in Section 2.1.4 of the project description. | **Round 1**<br>VVB Response<br>1.The VVB have updated the validation report to address the issues referenced.<br>2. The project description and the validation report has been updated.<br><br>Verra Response<br>1. Issue #1 has not been addressed. The project description does not state which stakeholder group's property rights were affected by the project whereas the validation report describes how the consent was obtained.<br>2. Issue #2 has not been addressed fully as Section 2.1.4 of the project description has not been updated.<br><br>Action Required<br>The VVB must ensure that the project description and validation report are updated to address the issues referenced above.<br>**Round 2**<br>VVB Response | Closed |

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| | Action Required<br>The VVB must ensure that the project description and the validation report are updated to address the issues referenced above.<br><br>Program Rule(s)<br>Section 3.13.6, 4.1.14 *Plastic Standard, v1.0* | The project description and validation report have been updated to address the issues referenced above.<br><br>Verra Response<br>This finding has been addressed. | |

| 11 | Anto-discrimination | | |
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| | Issue<br>Section 2.1.6 of the validation report does not provide an overall conclusion of the VVB's assessment regarding the measures planned to ensure that no entities involved in project design or implementation are involved in, or complicit in, any form of discrimination or sexual harassment.<br><br>Action Required<br>The VVB must ensure that the validation report is updated to address the issue referenced above.<br><br>Program Rule(s)<br>Section 3.13.10, 4.1.14 *Plastic Standard, v1.0* | **Round 1**<br>VVB Response<br>VVB have updated the validation report to address the issue referenced.<br><br>Verra Response<br>The issue has been addressed. | Closed |

| 12 | Feedback and Grievance Redress Procedure & Accessibility | | |
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| | Issue<br>1. Section 2.1.7 of the project description does not describe the project's feedback and grievance redress procedure, its contents, and how to use it.<br>2. Section 2.2.7 of the validation report does not describe the steps taken by the VVB to assess the project's feedback and grievance redress procedure.<br><br>Action Required | **Round 1**<br>VVB Response<br>The proponent and VVB has updated project description and the validation report to address the issues referenced.<br><br>Verra Response<br>1. Issue #1 has been addressed.<br>2. Section 2.2.7 of the validation report has been updated. It is unclear how the VVB assessed "Response times for grievances lodged were | Closed |

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| | The VVB must ensure that the project description and the validation report are updated to address the issues referenced above.<br><br>Program Rule(s)<br>Sections 3.13.12, 3.21, 4.1.14, *Plastic Standard, v1.0* | analyzed to verify the response process as being an integral part of the feedback system for maintaining trust and showing commitment to addressing concerns. Resolution effectiveness was also assessed to confirm the outcomes of grievances filed, review whether issues were resolved satisfactorily and determine whether the solutions were communicated effectively to the complainants" since no "…no cases were recorded at the time of the audit."<br><br>Action Required<br>The VVB must address the issue referenced above.<br>**Round 2**<br>VVB Response<br><br>Issues referenced above have been addressed by the VVB.<br><br>Verra Response<br>The finding has been addressed. | |

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| **13** | **Safeguards** | | |
| | Issue<br>1. Section 2.3.1 of the project description does not identify health impacts as a result of the project activity in the project boundary and potential hazards and safety risks associated with the implementation of the project activity.<br>2. Section 2.3.2 of the project description does not indicate whether the project leads to the elimination of income-generating activities, including details on | **Round 1**<br>VVB Response<br>1 Section 2.3.1 of the project description has been updated by the project proponent to identify health impacts as a result of the project activity in the project boundary and potential hazards and safety risks associated with the implementation of the project activity.<br>2 Section 2.3.2 of the project description has been updated by the project proponent to describe whether the project leads to the elimination of income- | Closed |

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| | the creation of alternative activities or a justification for loss of employment as a result of the project activity, if any.<br>3. Section 2.3.2 of the validation report states that the VVB assessed the elimination of income-generating activities by verification through interviews with the project proponent and MGA management and by checking the full-time employee lists of MGAs. However, it is unclear how the interviews with the project proponent and their employment records conformed that the project did not result in the elimination of any existing income generating activities. It is unclear why the VVB did not interview the small-scale informal recyclers to confirm the veracity of the public comments and assess any aspects related to elimination of income generating activities.<br>4. Section 2.3.3 of the validation report does not describe the steps taken to assess the information provided in Section 2.3.3 of the project description.<br>5. Section 2.3.4 of the validation report does not describe the steps taken to assess the information provided for each of the aspects in Section 2.3.4 of the project description.<br><br><u>Action Required</u><br>The VVB must ensure that the project description and the validation report are updated to address the issue referenced above.<br><br><u>Program Rule(s)</u> | generating activities, including details on the creation of alternative activities or a justification for loss of employment as a result of the project activity, if any<br>3 Section 2.3.2 of the validation report have revised to address the issue referenced.<br>4 VVB has updated Section 2.3.3 of the validation report to describe the steps taken to assess the information provided in Section 2.3.3 of the project description<br>5 Section 2.3.4 of the validation report have been updated to describe the steps taken to assess the information provided for each of the aspects in Section 2.3.4 of the project description.<br><br><u>Verra Response</u><br>1. Issues #1, 2, 4 and 5 have been addressed.<br>2. Section 2.3.2 of the validation report has been updated. However, it is unclear how not interviewing the small-scale informal recyclers was deemed appropriate by the VVB despite one of the public comments specifically claiming elimination of income generating activities of small-scale recyclers.<br><br><u>Action Required</u><br>(Issue #2) The VVB must clarify how not interviewing the small-scale recyclers was deemed appropriate despite the claims about elimination of income generating activities of small-scale recyclers in one of the public comments.<br>**Round 2**<br><u>VVB Response</u><br>The VVB have clarified how not interviewing the small- scale recyclers was deemed appropriate despite the claims about elimination of income generating activities of small-scale recyclers in one of the public comments. | |

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| | Sections 3.14.2-3.14.13, 4.1.14, *Plastic Standard, v1.0* | Verra Response<br>This finding has been addressed. | |

| 14 | Application of Methodology (PWRM0001) | | |
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| | Issue<br>1. Section 3.2 of the project description states that collection is conducted by informal sector waste pickers, aggregators or community-based organizations which are then bought by the project proponents in Applicability Condition 1, whereas Section 1.10 states that the collection happens through buy-back centers and mobile collection as well.<br>2. Section 2.4.2 of the validation report under applicability condition 3 does not provide the source for the data point "…8 percent is collected nationwide…".<br><br>Action Required<br>The VVB must ensure that the project description and validation report are updated to address the issues referenced above.<br><br>Program Rule(s)<br>Sections 3.2.1, 4.1.14- 4.1.15, *Plastic Standard, v1.1*<br>Section 4, *Plastic Waste Collection Methodology, v1.1* | **Round 1**<br>VVB Response<br><br>1. Section 3.2 of the project description have been updated by the project proponent<br>2. Section 2.4.2 of the validation report under applicability condition 3 referenced WWF on "EXTENDED PRODUCER RESPONSIBILITY FOR SINGLE-USE PLASTICS AND PACKAGING WASTE STREAMS: AN ASSESSMENT FOR KENYA" as source of data<br><br>Verra Response<br>The project description and validation report have been updated to address the issues. | Closed |

| 15 | Application of Methodology (PWRM0002) | | |
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| | Issue | **Round 1** | |

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| | 1. Section 2.4.2 of the validation report:<br>a. under Applicability Condition 1 states: "During site visits it was observed that HDPE, PP and PET have been mechanically recycle using a locally made flaker and pelletizer to be stored in a clean dry location in reusable plastic sacks at the recycling facility. The project activity initially increases the capacity of mechanical recycling at the processing site by facilitating additional plastic waste collection at the collection site", whereas the project description states that it is a new activity.<br>b. under Applicability Condition 2 does not describe how the review of sales receipts of suppliers against volume deliveries by suppliers at the recycling facilities confirmed that plastic waste recycled was collected from the environment; and<br>c. under Applicability Condition 10 references and provides an assessment for the collection activity instead of recycling activity in the statement: "As defined in the project eligibility criteria for additionality (Section 3.6), the plastic waste recovery is below 20%. Therefore, the project activities do not compete with other collection activities."<br><br>Action Required<br>The VVB must ensure that the validation report is updated to address the issues referenced above.<br><br>Program Rule(s)<br>Sections 3.2.1, 4.1.14- 4.1.15, *Plastic Standard, v1.1* | VVB Response<br><br>Section 2.4.2 of the validation report have updated by to address issues referenced (a), (b) and (c)<br><br>Verra Response<br>The validation report has been updated to address the issue. | Closed |

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| | Section 4, *Plastic Waste Collection Methodology, v1.1* | | |

| 16 | **Project Boundary** | | |
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| | Issue<br>1. Table 8 in Section 3.3 of the project description does not include households and commercial entities as the sources of plastic waste as stated in the other sections of the project description.<br>2. Figure 27 in Section 3.3 of the project description does not show the locations of all the project activity instances.<br><br>Action Required<br>The VVB must ensure that the project description is updated to address the issues referenced above.<br><br>Program Rule(s)<br>Section 3.2.1, *Plastic Standard, v1.0* | **Round 1**<br>VVB Response<br>Project description have been updated by the project proponent to address the issues (1) and (2).<br><br>Verra Response<br>The project description has been updated to address the issues. | Closed |

| 17 | **Additionality** | | |
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| | Issue<br>1. Section 3.6 of the project description calculates the penetration rate of the recycling activity using the amount of plastic waste recycled in Kenya as C, instead of total installed recycling capacity which does not meet the methodology requirements.<br>2. Section 2.4.5 of the validation report provides an incorrect assessment of the penetration rate of recycling activities using the amount of plastic waste recycled in Kenya as C, instead of the total installed recycling capacity which does not meet the methodology requirements. | **Round 1**<br>VVB Response<br>There is a dearth of data on recycling capacity and operations in Kenya. The project's research and market intelligence indicate that existing recycling operations tend to be small-scale. The project considered a conservative scenario where recycling factories are only functioning at half of their capacities, meaning with an Average Capacity Utilization Rate of 50%, as an Average Capacity Utilization Rate below 50% would not be economically viable over a multi-year period<br><br>It meant that penetration rates calculated would be two times | Closed |

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| | Action Required<br>The VVB must update the project description and the validation report to address the issues described above.<br><br>Program Rule(s)<br>Sections 3.21, 4.1.14, *Plastic Standard, v1.0*<br>Section 7, *Plastic Waste Recycling Methodology, v1.1*<br><br>Background<br>The project proponent must assess the penetration rate of the project activity in the relevant region for all material types managed in the project activity using the formula prescribed by the methodology. If the data as per the formula prescribed by the methodology is not available, a project may conduct an investment analysis to demonstrate additionality. | higher and for instance the maximum penetration rate for HDPE as callauted at 7% would be 14.0%. This conservative scenario results in recycling penetration rates still below 20%.<br><br>Verra Response<br>Issues #1 and #2 have not been addressed.<br><br>Action Required<br>The VVB must update the project description and the validation report to address the issues described above.<br><br>Background<br>The project proponent must assess the penetration rate of the project activity in the relevant region for all material types managed in the project activity using the formula prescribed by the methodology. If the data as per the formula prescribed by the methodology is not available, a project may conduct an investment analysis to demonstrate additionality.<br>**Round 2**<br>VVB Response<br><br>The VVB has ensured that the project description and the validation report have been updated to address the issues described above | |

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| | | Verra Response<br>1. Section 3.6 of the project description has been updated to state: "…independent market research has been done by interviewing industrial experts to estimate as precisely as possible the generation and recycling capacity of plastic waste for the material types focused by MGA. In cases where recycling capacity was expressed as a range, the maximum value was selected to adopt the most conservative approach." However, the details of this research have not been provided and nor have the values ascertained as a part of this research been provided in the project description;<br>2. The penetration rate of HDPE recycling is mentioned twice as 4.69% and 3.42% creating confusion about the correct value in both the project description and validation report.<br>3. It is unclear why the penetration rate is presented twice, using the estimated recycling capacities and the amounts recycled in both the project description and validation report.<br><br>Action Required<br>The VVB must update the project description and the validation report to address the issues described above. | |
| | | **Round 3** | |
| | | VVB Response<br>The VVB have updated the project description and the validation report to address the issues described in (1), (2) and (3). | |

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| | | Verra Response<br>The issue has been addressed. | |

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| 18 | **Estimated Project and Net collected and/or recycled plastic waste** | | |
| | Issue<br>1. Section 4.2 of the project description does not describe the procedure for quantification of project collected and recycled plastic waste in accordance with the applied methodologies.<br>2. Section 4.3 of the project description does not include the equations for quantification of net collected and recycled plastic waste in accordance with the applied methodologies.<br>3. Section 2.4.7 of the validation report:<br>a. references "Joint Plastic Project Description and Monitoring Report" in the statement "The quantification of the (estimated) baseline, project and net collected and recycled plastic waste as described in the Joint Plastic Project Description and Monitoring Report were assessed" instead of project description; and<br>b. states: "The data sources for calculating the baseline collected and recycled plastic waste volumes were reviewed, and recalculation of the baseline collected and recycled plastic waste volumes was performed to ensure accuracy" but it is unclear why that was done as the baseline for the project collection and recycling activities is zero. | **Round 1**<br>VVB Response<br>The VVB have ensured the updates of both project description and validation report to address referenced issues.<br><br>Verra Response<br>The project description and validation report have been updated to address the finding. | Closed |

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| | Action Required<br>The VVB must ensure that the project description and validation report are updated to address the issues above.<br><br>Program Rule(s)<br>Sections 3.2.1 and 4.1.14, *Plastic Standard, v1.0* | | |