Plastic Waste Reduction Standard

VALIDATION REPORT

MR. GREEN AFRICA & REMOVALL: PLASTIC WASTE REDUCTION PROJECT IN KENYA

CONTROLUNION

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Client	MGA GROUP B.V
Project Title	Mr. Green Africa & Removall: Plastic waste reduction project in Kenya
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Summary

Mr. Green Africa, the first recycling company to be a Certified B Corporation on the African continent, leverages business as a force for good to realize sustainable, long-term social, environmental and economic impact through the collection, conversion and selling of post-consumer plastic waste. Its technology-driven plastics collection model enables waste collection at source, integrating informal waste workers, micro-entrepreneurs and consumers into formal value chain, increasing the amount of post-consumer plastic waste Mr. Green Africa collects and providing stakeholders with the chance to earn a fair, predictable and transparent income and benefits. Mr. Green Africa has world-class processing equipment, housed at their factory in Nairobi, allows Mr. Green Africa to convert locally collected plastic waste into high-quality PCR (Post Consumer Recyclates) and sell it as a substitute imported virgin plastics at competitive rates. To close the loop, Mr. Green Africa works closely with brand owners and third-party plastics manufacturers to develop and execute three-way off take agreements for high quality PCR, helping FMCGs (Fast-moving consumer goods) and others realize their sustainable packaging goals by accessing ethically sourced, locally produced PCR.

The purpose of this validation is to independently assess the project against the requirements of the Plastic Standard v1.0 and other documents within the Waste Reduction Program. The project activity has been elaborated in the project description report of the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya. The project activity description also includes the monitoring elements for plastic credits. During the validation process, observation, interviews, and document review were used to assess the consistency and reality of project activities as captured in the report against practical experience. Mr. Green Africa & Removall: Plastic waste reduction project in Kenya was reviewed against the requirements of the Plastic Standard v1.0, the Plastic Waste Collection Methodology (PWRM0001, v1.1) and Plastic Waste Recycling Methodology (PWRM0001, v1.1)

During the validation of the project, two (2) Clarification Requests, fourteen (14) Corrective Action Requests, and one (2) Forward Action Requests were issued.

Control Union Ghana was solely responsible for providing an independent validation conclusion related to the project's compliance with the Plastic Standard v1.0, Plastic Waste Collection Methodology (PWRM0001 v1.1) and the Plastic Waste Recycling Methodology (PWRM0002 v1.1) from Verra. Evidence gathered through the sample assessed during the validation period by Control Union Ghana confirmed that the project was in line with what was reported in the project description and followed the Plastic Waste Reduction Standard v1.0 and methodologies - Plastic Waste Collection Methodology (PWRM0001 v1.1) and the Plastic Waste Recycling Methodology (PWRM0002 v1.1) of the project collection and recycling activities.

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1 VALIDATION PROCESS

1.1 Objective

The objective of a validation was an independent assessment by a third party of the proposed project against the Waste Reduction Program requirements enabling the project register as a Plastic Program project under Verra. Throughout the validation process, the project activities and instances were confirmed with collected evidence (through interviews, document reviews as well as observations made onsite) as to whether the project proponent's practices were indeed in line with what was reported in the project description and in accordance with the Plastic Standard v1.0 and implemented methodologies (Plastic Waste Collection Methodology v1.1 and the Plastic Waste Recycling Methodology v1.1). Assessment processes included but not limited to checking if the project was in conformance with the Plastic Standard v1.0 criteria, applicable methodologies which involved assessing monitoring systems, additionality, stakeholder engagement/consultations, baselines, social and environmental impacts. This assessment can be done periodically whenever the project proponent wishes to request issuance of plastic credits. As part of this step, the volumes of plastic to be collected and recycled were assessed to ensure the process is in line with the methodologies (Plastic Waste Collection Methodology v1.1 and the Plastic Waste Recycling Methodology v1.1), Plastic Standard v1.0. At the end a validation conclusion was reached by the Control Union Ghana and confirmed compliance of the project's activities with the Plastic Waste Reduction Program requirements.

1.2 Scope and Criteria

The scope for the validation is defined as an independent and objective review of the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya. The essential elements checked included:

1) Whether the Project Description matches reality on the ground
2) Accurate & correct definition and calculation of the baseline scenario
3) Additionality of the project
4) Transparency and adequate monitoring of collected and recycled plastic volumes.
5) Accurate estimation of plastic waste to be collected or recycled.
6) Stakeholder engagement & consultation
7) Social and environmental impact of the project

The project is reviewed against the Plastic Standard v1.0 and the Plastic Waste Collection Methodology (PWRM0001 v1.1) and the Plastic Waste Recycling Methodology (PWRM0002 v1.1). For activities related to collection the PWRM0001 v1.1 was used and PWRM0002 v1.1 was also used for activities related to recycling.

These activities were carried to finally reach a conclusion at a reasonable level of assurance regarding the validation of the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya.

1.3 Level of Assurance

A credible level of assurance is guaranteed for this validation, in line with the ISO 14064-3 guidelines and the Plastic Standard v1.0 requirements. This level of assurance was achieved through reviewing of supporting documents, interviews actors involved, and observations made during site visits. Majority of supporting documents were reviewed remotely, and partly onsite, and onsite visits were done in person. To maintain a reasonable level of assurance, the site visit was done at respective project locations (Bamburi, Bombolulu, Eldoret, Malindi & Nairobi) based on project activities where the project team members of the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya led the lead assessor and showed him around the collections sites and recycling facility to determine objectively whether activities were in line with Plastic Standard v1.0 requirements. Interviews with employees, partners and/or stakeholders were conducted privately (in a separate room with closed door, in isolations and via phone call) ensuring as little interference as possible from project management team.

1.4 Summary Description of the Project

Project Title	Mr. Green Africa & Removall: Plastic waste reduction project in Kenya
(main) Project Participants	Removall SAS
Location of the project	Kenya
Project start date	01 July, 2020
Applied methodology/version	Plastic Standard v1.0, Plastic Waste Collection Methodology (PWRM0001, v1.1) and the Plastic Waste Recycling Methodology (PWRM0002, v1.1).
Plastic crediting period	The Project Crediting Period is 7 years from 01 of July 2020 to 30 of June 2027 (twice renewable).

1.5 Audit Team Composition

The table below shows the team that performed the validation assessment and the different roles fulfilled by each individual. To ensure persons interviewed could understand and provide adequate response in their native language, independent interpreters (James Mureithi & Emily Gitonga) were used to collect all the necessary information and helped provide clarifications when needed. The interviews (both remote and onsite) were conducted by Davidson Boahene and the report on the validation process was finalized by Davidson Boahene.

Name	Role	Task	Expertise
Davidson Boahene	Lead Verifier	RDR, RMI, OV/I, RP	Sustainability, (recycling) certification programs and agriculture
James Mureithi	Interpreter	IP	Sustainability, Certifications & Inspections and agriculture
Emily Gitonga	Interpreter	IP	Marketing, Laboratory information management system

*RDR=Remote Desk Review, *RMI=Remote Interviews, OV/I=Onsite Visits/Inspections, *RP=Reporting *IP=Interpreter

1.6 Method and Criteria

This validation was conducted in three major steps as outlined below. The assessment was conducted in line with the ISO 14064-3 principles, the Plastic Program v1.0 requirements, and with the guidance of the VCS Validation and Verification Manual. These protocols were adapted to plastics and the necessity to conduct the validation onsite.

1. Preparation:

- Development of the validation planning (indicating what documents to review, locations to visit, and stakeholders to consult).
- Preparing a checklist based on the documents of Plastic Standard v1.0, the methodologies (PWRM0001 v1.1 & PWRM0002 v1.1), and the format for this report using the appropriate reporting and following instructions.
- Comprehensive analysis of the Project monitoring report prepared by Mr. Green Africa & Removall: Plastic waste reduction project in Kenya

2. The actual validation process:

- Remote and onsite document Review.
- Application of methodology.
- Monitoring.
- Traceability assessment (plastic supply chain from collectors to end use (recycling facility).
- Safeguards and stakeholder engagement.

- Desk review with project management team (both local and project level).
- site visits
- Clarification calls when needed.

3. Follow-up on CARs, CLs, FAR's

- Review of evidence in closing CARs
- Clarification calls where needed.
- Review of action plan to close FARs

Interviews:

With respect to interviews, the main project partners were selected for a more extensive discussion. A main project partner in this case is a partner that is closely involved in either the financing, collecting, or recycling activities and were interviewed onsite. Local project partners were also included in the interviews. Most collectors are informal collectors and were therefore identified as vulnerable group. Onsite visits to local collectors for interviews in combination with the recycling facility tour was done. Some collectors were met at their locations collection points where they took the audit team through their collection process via interview.

1.7 Document Review

Project monitoring report, supporting background documents including but not limited to agreements/contracts, procedures, policies, training records, communication materials (E.g., posters), volume database, receipts etc were requested and reviewed. These aforementioned documents were used to check whether the project was in line with the requirements of the Plastic Waste Reduction Program. The document review included an examination of the project design, monitoring system, stakeholder engagement protocols, health and safety reports, and protocols, baseline scenario and collection estimates, plastic traceability, and legal documentation. The lead assessor also confirmed from externally available data to verify legal documents, assumptions made in calculations, and technical data. The important document was the data records that Mr. Green Africa & Removall: Plastic waste reduction project in Kenya presented. This report contained an overview of the collected waste per project area and day-to-day calculations carried out. This was cross-checked with the administration of local partners (at Bamburi, Bombolulu, Eldoret & Malindi). The quality of the data was checked based on the frequency of measurement, completeness of the data, consistency, the calibration of measurement equipment used, and the quality control procedures. An overview of all documents assessed was made available when requested and reviewed thoroughly. Throughout the remainder of the document review process, references were made to show where certain information was collected. When documents submitted required further explanations, a clarification call was scheduled, and the documents were then updated if needed by Mr. Green Africa & Removall: Plastic waste reduction project in Kenya and shared accordingly, which checked by VVB to determine its accuracy and true representation on the ground.

1.8 Interviews

The goal of the interviews was to confirm whether protocols detailed in the project monitoring report had taken place, project partners had a clear understanding of the project, and if the safeguards (social and health) were also achieved by the project.

Interviewee	Role	Organization	Subject
Yunia Bidali	Chief Growth and Expansion Officer	MGA GROUP B.V.	Project Proponent, Growth and Expansion Initiative
Côme FALQUE	Project Manager	Removall SAS	Project Management and Authorized Representative, Innovative Environmental Assets
Bennit Odhlambo	Management Representative	MGA GROUP B.V.	Project Supportive Services
Maurice Ala	NGO	Danish Refugee Council (DRC)	Stakeholder engagement & Safeguards
Terry Wambi Gichuhi	HSE Manager	MGA GROUP B.V.	Health & Safety
Sharon Kangai	HR Manager	MGA GROUP B.V.	Finance & Accounts, Working Conditions, Stakeholder engagement & Safeguards
Job Laleyo	County Officer	NEMA	Project Awareness Raising Activities, Stakeholder engagement & Safeguards
James Njenga Maina	Community Leader	Waste Picker	Plastic Waste Collection Activities, Stakeholder engagement & Safeguards
Daniel Gichuru	Sourcing Manager	MGA GROUP B.V.	Operational Management, Project traceability, Monitoring process, Stakeholder engagement & Safeguards

Richard Kiyondi Boriga	PC (Mobile Trading Point Personnel - Nairobi)	MGA GROUP B.V.	Plastic Waste Sourcing Activities
Samuel Mukwabi Wesonga	PC (Mobile Trading Point Personnel - Malindi)	MGA GROUP B.V.	Plastic Waste Sourcing Activities
Aaron Muthani Kavuti	Inventory Assistant - Malindi	MGA GROUP B.V.	Volume Reconciliation and Validation, Supervision Of Hub Activities
Kennedy Kithusi	Productivity Assistant - Bamburi	MGA GROUP B.V.	Operational Management & Processing.
Mandela Mutesa	Operations Manager – Coastal Region	MGA GROUP B.V.	Project traceability, Recycling process, Monitoring process, Stakeholder engagement & Safeguards
Gloria Nyevu	Logistics Officer - Bombolulu	MGA GROUP B.V.	Transportation Services & Invoicing
Zablon Mwalimu	Regional Inventory Supervisor - Eldoret	MGA GROUP B.V.	Project traceability, Recycling process, Monitoring process, Stakeholder engagement & Safeguards
Keith Kemboi	Machine Operator	MGA GROUP B.V.	Recycling Activity/Operations
Pamela Ewoe	Pre-Sorting Worker	MGA GROUP B.V.	Recycling Activity/Operations
Naftali Odhiambo Odete	Production Supervisor - Nairobi	MGA GROUP B.V.	Operational Management (Planning & Supervision)
Vicentia Orient	Quality Control Assistant	MGA GROUP B.V.	Quality Checks
Aggrey Mugambi	Supplier	Waste Picker	Plastic Waste Sourcing Activities
Jafar Ali	Supplier	Waste Picker	Plastic Waste Sourcing Activities

Kingston Nyata	Supplier	Waste Picker	Plastic Waste Sourcing Activities
Richard Kainika	Secretary General	Kenya Association of Waste Recyclers	Stakeholder engagement & Safeguards
John Chweya	Member	Waste Picker Association	Stakeholder engagement & Safeguards

1.9 Site Inspections

In person onsite visits were employed during the validation process to confirm project description with reality on the ground. During the onsite visits at the various locations sampled, the audit team adopted interviews, document review and observations as methods of obtaining objective evidence to ensure compliance to Waste Reduction Program requirements by project management and partners. Locations visited for validation were based on assessment after review of project description report by the audit team and project activities carried out in the respective sites.
The sites and corresponding dates of visit are listed below:

03-04-2024

Visit to Eldoret Hub

- Verified the plastic waste collection system through installation of collection centers called Trading points.
- Traceability (correspond the volumes of plastic types collected at collection hub vis a vis the recycling facility.
- Interviewed group of workers at the collection hub.
- Assessed the hub (Including safety measure in place)
- Confirmed recycling process at the hub.
- Assessed recycling machinery at the hub.
- Conducted stakeholder interviews.
- Interviewed suppliers of plastic waste to the hub.
- Observed the hub to confirm awareness raising materials including posters in communicating project policies.
- Confirmed working conditions as per labour laws via interviews with workers.

- Traceability (corresponded the volumes of collected and recycled plastic waste) as reported at the recycling facility.
- Reviewed all relevant documents including calibration certificates.

04-04-2024

Visit to Mombasa – Mombululu Hub

- Verified the plastic waste collection system through installation of collection centers called Trading points.
- Traceability (correspond the volumes of plastic types collected at collection hub vis a vis the recycling facility.
- Interviewed group of workers at the collection hub.
- Assessed the hub (Including safety measure in place)
- Confirmed recycling process at the hub.
- Assessed recycling machinery at the hub.
- Conducted stakeholder interviews.
- Interviewed suppliers of plastic waste to the hub.
- Observed the hub to confirm awareness raising materials including posters in communicating project policies.
- Confirmed working conditions as per labour laws via interviews with workers.
- Traceability (corresponded the volumes of collected and recycled plastic waste) as reported at the recycling facility.
- Reviewed all relevant documents including calibration certificates.

04-04-2024

Visit to Mombasa – Bamburi Hub

- Verified the plastic waste collection system through installation of collection centers called Trading points.
- Traceability (correspond the volumes of plastic types collected at collection hub vis a vis the recycling facility.
- Interviewed group of workers at the collection hub.

- Assessed the hub (Including safety measure in place)
- Confirmed recycling process at the hub.
- Assessed recycling machinery at the hub.
- Conducted stakeholder interviews.
- Interviewed suppliers of plastic waste to the hub.
- Observed the hub to confirm awareness raising materials including posters in communicating project policies.
- Confirmed working conditions as per labour laws via interviews with workers.
- Traceability (corresponded the volumes of collected and recycled plastic waste) as reported at the recycling facility.
- Reviewed all relevant documents including calibration certificates.
-

05-04-2024

Visit to Malindi Hub

- Verified the plastic waste collection system through installation of collection centers called Trading points.
- Traceability (correspond the volumes of plastic types collected at collection hub vis a vis the recycling facility.
- Interviewed group of workers at the collection hub.
- Assessed the hub (Including safety measure in place)
- Confirmed recycling process at the hub.
- Assessed recycling machinery at the hub.
- Conducted stakeholder interviews.
- Interviewed suppliers of plastic waste to the hub.
- Observed the hub to confirm awareness raising materials including posters in communicating project policies.
- Confirmed working conditions as per labour laws via interviews with workers.
- Traceability (corresponded the volumes of collected and recycled plastic waste) as reported at the recycling facility.
- Reviewed all relevant documents including calibration certificates.

06-04-2024

Visit to Nairobi – Recycling Facility

- Verified the plastic waste collection system through installation of collection centers called Trading points.
- Traceability (correspond the volumes of plastic types collected at collection hub vis a vis the recycling facility.
- Confirmed the recycling processes on plastic waste from reception to end destination
- Interviewed group of workers at the recycling facility.
- Confirmed recycling process at the hub.
- Assessed recycling machinery at the facility.
- Conducted stakeholder interviews.
- Observed the recycling facility to confirm awareness raising materials including posters in communicating project policies.
- Confirmed working conditions as per labour laws via interviews with workers.
- Traceability (corresponded the volumes of collected and recycled plastic waste) as reported at the recycling facility.
- Reviewed all relevant documents including calibration certificates.

1.10 Public Comment

The project received two comments during the consultation period from an individual belonging to Kenya Association of Waste Recyclers. The individual's comment.

Comment 1

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.

Mister Green Africa & Removall answer:

Since the crediting start date of the project in July 2020, the plastic types recycled by Mister Green Africa do not have recycling rates above 20% in the geographical areas of the project. Please refer to section 3.5 and section 3.6 of the Project Description Documentation for more information.

The studies mentioned by the stakeholder globally lack precise figures. A WWF study "Extended Producer Responsibility for single-use plastics and packaging waste streams: an assessment for Kenya" conducted in 2022 had an estimated PET generation nearly 3 times more important than the one mentioned. Other recent references come to the same conclusion with recycling rates far below 20% such as the "Plastic Pollution Policy Country Profile: Kenya" by the Duke Nicholas Institute with an estimated overall 8% recycling rate (section 1.12.2 of the Project Description Documentation).

EPR regulation is still under development in Kenya, therefore there is currently a lack of plastic collection and recycling infrastructures and a lack of reliable data on the overall plastic recycling sector in the country. In addition, there is no correlation between the monthly EPR fees for different plastic materials from the KEPRO's subsidy rates and the recycling rates in the project geographical area.

Since the beginning of the project in 2020, MGA puts a lot of effort into the empowerment of its 2,500 informal waste pickers and 120 employees, as demonstrated by its fair compensation policy which is one of the solutions to provide better living conditions to the vulnerable stakeholders of that sector, as well as the numerous social campaigns put in place (e.g., "support a waste picker" health program, loyalty program, safety trainings…). Please refer to section 2.3 of the Project Description Documentation for more information.

VVB Assessment:

The plastic recycled by type, as referenced in the stakeholder's comments regarding its recycling rate, was confirmed to be inaccurate through a review of a study commissioned by WWF. The study revealed that the recycling rates are 4.4% for PET, 7% for HDPE, and 1.3% for PP, which contradicts the claims made in the public comments by the stakeholder.

Furthermore, it was found that EPR regulation is currently under development in Kenya, with no official communications published during the validation process. As a result, reliable data on plastic collection, recycling infrastructures, and the plastic recycling sector in the country is not available. The VVB evaluated the connection between the monthly EPR fees for different plastic materials based on KEPRO's subsidy rates mentioned by the stakeholder and the recycling rates in the project's geographical area, but no correlation could be established.

MGA is committed to creating job opportunities, empowering individuals, and enhancing the living conditions of vulnerable populations. This commitment was evident during onsite interviews, where female employees expressed that they were granted leadership positions, something they hadn't anticipated when they initially joined MGA. Additionally, the loyalty program implemented by MGA has led waste pickers to confirm that they receive fair compensation for the waste they deliver. MGA has also instituted health and safety programs to protect the well-being of waste pickers and suppliers.

The verification of a recent (2022) study commissioned by WWF and the Nicholas Institute for Environmental Policy Solutions, as referenced by the project, discredits the claims made by the

stakeholder, showing that their assertions are contradictory to the findings presented in the reviewed study reports. Additionally, the review of responses and supporting references confirmed that the project effectively addressed the comments received.

Comment 2

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

Mister Green Africa & Removall answer:

MGA's project cannot either be described as going against "a just transition for the informal players", where its core principles and engagements are to better remunerate the waste pickers (section 1.12.2 of the PDD) and to set-up strong social co-benefits for the informal waste sector (section 2.3 of the PDD) which desperately needs it.

MGA has a key role in promoting fair compensation for waste pickers, thereby empowering them to enhance their collection capabilities and access to a reliable market. MGA's project of collection and recycling of plastic waste in Kenya - where 92% of plastic waste is mismanaged - cannot be described as having "negative impact on the recycling space" or "threatening the livelihoods of their competitors". As detailed in section 1.12 and 3.5 of the PDD, plastic waste pollution remains a major problem in the country, and we should do nothing but to encourage as many actors as possible to get involved. Since the beginning of activities in 2020, MGA has proven that it has the capacity to scale-up for being one of the key barriers against plastic pollution in Kenya.

Plastic credit finance granted to MGA's project will be used to scale-up its collection and recycling activities (addressing new plastic types, expand geographical coverage, establish new factories…) and to maintain the strong co-benefits for the informal waste sector resulting in improved environmental and social conditions for Kenya.

Review of responses and references of support confirmed the project addressed comments received adequately. The comments and associated actions reflected in the project description report and no update to the project design was required to that effect.

VVB Assessment:

VVB assessed the elimination of income-generating activities resulting from the project activity and for small-scale recyclers as claimed by the stakeholder in the public comments received. The project does not eliminate any income-generating activities. Verification through interviews with the project proponent and MGA management confirms that there is no expected decrease in employment due to project activities throughout its lifetime. This was verified by reviewing the full-time employee lists of MGAs which have created enormous job opportunities and employed over 100 workers. A study commissioned by WWF in 2022 referenced by the project and confirmed during the assessment affirmed that out of the 982,580 tonnes of plastic estimated being generated annually, only 2.2% of the total waste collected per polymer types are being able to be recycled making available more waste for recycling.

Kenya Association of Waste Recyclers (KAWR) is a registered non-profit organization established in 2017 under section 10 of the Societies Act with a membership base across the country. Members consist of players in different levels of the recycling value chain, such as waste pickers, collectors/site managers (Viwanja People), transporters, value addition (sorting, crushers, washers, pelletizers), converters/manufacturers, and other interested parties. As an organization, they concentrate on sharing knowledge among our members and other stakeholders on the most efficient recycling approaches as one of the workable solutions to the waste management problem facing this country in order to achieve a circular economy in resource utilization. Richard Kainika expressed through interview that the organization members recycle various types of materials that have completed their service use or were previously used for packaging other products, including (Plastics (thus PET, LDPE, PVC, PP, HDPE, and Polystyrene); members are grouped into two tiers based on the respective activities they perform. Tier 1 members are made up of waste pickers/reclaimers, and Tier 2 members are the aggregators. The organization, through Richard Kainika, explained during the interview that MGA buys directly from the pickers, cutting off the aggregators and threatening their business.

The small-scale recyclers were interviewed through their representative (Richard Kainika - Kenya Assocation of Waste Recyclers) who claimed that MGA price rates for plastic waste were high and wanted to understand what makes MGA pricing on plastic waste materials were higher than other recyclers. During the interview, views on the marketing pricing system as well reasons why these claims made were assessed. Further verifications through interviews with waste pickers and suppliers who forms part of the Kenya Association of Waste Recyclers, it was determined that 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. MGA conducts market pricing surveys. The survey report reviewed highlights weekly pricing trends in the various project locations as well as price changes per plastic type. The project also studies and monitors the average price trends for previous months. Based on these results, MGA is able to establish the average selling price for each plastic type and anticipate price changes in subsequent weeks. Contrary to what is being claimed in the public comments, the local community representative interviewed confirmed that MGA plastic prices and that of the markets have no significant difference. However, they prefer to sell to MGA because they receive cash equivalence on products immediately, unlike other places where they have to wait for several days/weeks before receiving their monies upon making deliveries.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 informal waste recycling entities (e.g., Kenya Association of Waste Recyclers). Taking into account the diverse backgrounds of the stakeholders involved in the project, both qualitative and quantitative approaches were used to gather relevant information during the assessment process. It was based on three lines of evidence: desk review, interviews, and observation. A sampling process was employed to select locations and actors from the various counties of the project. All project locations were visited. This is because of the assumption of heterogeneities in responses by the suppliers, workers, and stakeholders in different locations and counties. However, the focus was more on highly interested (Kenya Association of Waste Recyclers) and marginalized stakeholders (Local communities, Informal Suppliers, etc). VVB assessed the elimination of income-generating activities resulting from the project activity and for small-scale recyclers, as claimed by the stakeholders in the public comments received. The project does not eliminate any income-generating activities. MGA operations project doesn't risk eliminating income generation as demonstrated in sections 2.1.2 and 2.3.2 of the project description report. The project has been able to demonstrate this through its sustainability initiatives (e.g., instituting a loyalty program. Market surveys on pricing have been carried out to understand suppliers' needs, preferences, and market trends to ensure a fair pricing system is established with all actors within their supply chain. Assessment has been carried out to identify and mitigate potential challenges. This includes considering factors like economic fluctuations, regulatory changes, and competition. The project also fostered collaboration among stakeholders, such as project managers, community members, and suppliers, to enhance project success and ensure a shared understanding of the project's goals and potential risks. Verification through interviews with the project proponent and MGA management confirms that there is no expected decrease

in employment due to project activities throughout its lifetime. This was verified by reviewing the full-time employee lists of MGAs since its inception, and it was deduced that over the implementation period, employee growth has increased incredibly, which has created enormous job opportunities and employed over 100 workers. A study commissioned by WWF in 2022 referenced by the project and confirmed during the assessment affirmed that out of the 982,580 tonnes of plastic estimated to be generated annually, only 2.2% of the total waste collected per polymer type is being able to be recycled, making available more waste for recycling

Further investigations into MGA operations during the onsite assessment revealed that one of MGA's key objectives is to enhance the living conditions of vulnerable populations and also as part of its social impact contribution to the county through the project, it strives to bridge the living wage gap through fair trade and compensation for all its partners thereby instituting loyalty program making It a first trade choice when it comes to plastic waste. MGA seeks to remunerate its partners fairly which goes a long way in supporting them in the provision of food, shelter clothing and security. The project is designed with sustainability in mind, considering its impact on the environment, community, and the long-term viability of the income-generating activity.

A review of responses and references of support confirmed the project addressed comments received adequately. The comments and associated actions were reflected in the project description report and no update to the project design was required to that effect.

1.11 Resolution of Findings

List of all the Corrective Action Requests (CARs) and Clarification Requests (CLs) are provided in Appendix C. In all, two (2) Clarification Requests, fifteen (15) Corrective Action Requests were issued at the end of the validation process. The distinction between CL and CAR is made based on the impact to the project. For example, a clarification requests were issued when only clarity was required. For example, 2.1.9 of the PD on stakeholder access to project documentation states “project proponents also intend to provide project documentation to all stakeholders through the regular communication channels”. regular communication channels established was not defined in this statement and clarification request issued. CARs were made when the project did not provide adequate evidence or explanation on certain requirements of the Plastic Standard v1.0. For example, Stakeholder identification, description of locally appropriate methods used in the identification of all stakeholder groups who could potentially be affected by the project to ensure compliance with 3.13.1 of the Plastic Standard v1.0 was missing and project needed to establish a holistic stakeholder engagement procedure that allows for stakeholder identification, engagement and reporting. Upon review of the responses and evidence received on CLs & CARs raised by the project and deemed sufficient by the VVB then CLs and CARs are finally closed and corresponding changes made in project applicable documents (PD and reporting template).

1.11.1 Forward Action Requests

Two (2) forward action requests (FARs) were issued where actions on its implementation was expected by the VVB to be assessed in the next verification process.

FAR (1): Monitoring system to ensure compliance with project partners inadequate. Project team to develop a more improved monitoring plan and implementation actions be checked during the next monitoring period

FAR (2): Measures put in place (including instructions, signages etc.) for addressing potential hazards and safety risks associated with implementation of the project activities to be checked during the next monitoring period

2 VALIDATION FINDINGS

2.1 Project Details

2.1.1 Description of the Project Activity

The description of the project activities in the project description report were accurate and consistent with operations observed onsite. The project activity is a plastic waste collection activity, implementing PWRM0001 v1.1 and plastic waste recycling activity, implementing PWRM0002 v1.1 as stated below:

- Collection of plastic wastes from households, streets, public places, landfills, and dumpsites, and
- Recycling plastic waste at the recycling facility in Nairobi.

The plastic waste collection activities support local municipalities waste management systems by developing a network of collection and recycling infrastructure in order to remove plastic waste from the environment. The project benefits to local populations and most importantly it provides decent and sustainable living conditions for the informal sector.

The collaboration between the project proponent and all relevant stakeholders were evident during the validation process. Stakeholders interviewed also confirmed information communicated in the project description (e.g., building project awareness, sharing project updates, and obtaining community feedback as well as the project holding regular meetings in the community, and the project's locations

The project has implemented actions communicated in the project description report which was verified through interviews stakeholders, site visit including verifying with local team as the project proponent.

2.1.2 Project Type and Eligibility

Plastic Waste Reduction Program Methodologies (PWRM0001 Plastic Waste Collection Methodology, v1.1 and PWRM0002 Plastic Waste Recycling Methodology, v1.1) were adequately applied by Mr. Green Africa & Removall: Plastic waste reduction project in Kenya in accordance with its rules and requirements as such. Subsequently, the project also demonstrated their compliance with the Plastic Standard v1.0 and Plastic Program Guide v1.0 throughout validation process conducted by Control Union Ghana. Evidence collected both onsite and remotely, on the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya proved to be eligible in request of registration and Plastic Credit issuance via Verra. The project is a grouped project and as a such the project is further configured as multiple instances of multiple project activities, thus (there is more than one collection and /or recycling activity, with instances of some or all activities at different locations as described in the Plastic Standard v1.0. The Project Description of Mr. Green Africa & Removall: Plastic waste reduction project in Kenya indicated that project activities occur in the respective geographic locations of Kenya (specifically Eldoret, Mombasa (Bamburi & Mombululu), Malindi and Nairobi) areas or community network of plastic collection. The waste materials are sourced primarily from households, dumpsites, uncontrolled landfills, public areas, installed trading points which are recycled at the recycling facility (Nairobi) into pellets then finally sent to appropriate end destinations (plastic manufacturing companies). The project meets all applicable rules and requirements set out under the Plastic Waste Collection Methodology & Plastic Waste Recycling Methodology. Verified objectively through site visits (waste sorting process), traceability records on reported collected and recycled volumes. The project activities included plastic waste collection and recycling of materials categorized as polypropylene (PP), polyethylene terephthalate (PET), and High-density Polyethylene (HDPE) which falls under the scope of the Plastic Waste Reduction Program as described in the Plastic Standard v1.0. The project is both plastic waste collection and recycling activity, and the project activity also develops new collection infrastructure facility for sorting and recycling of plastic waste.

2.1.3 Project Configuration

The project configuration was validated by interviewing the project management and their objectives for the future of the project's activities and instances against references as required in the Plastic Standard v1.0. Mr. Green Africa & Removall: Plastic waste reduction project in Kenya can be identified as a grouped project in line with the definition provided in the waste reduction program as described in Plastic Standard v1.0 related to project configurations. It conducts multiple activities (collection and recycling) and each activity has multiple instances (collection in Eldoret, Mombasa (Bamburi & Mombululu), Malindi and recycling activities in Nairobi).

Criteria	VVB Assessment
Project Locations 1.11	Mr. Green Africa & Removall: Plastic waste reduction project in Kenya at the time of the validation process covered 3 provinces in Kenya with its main areas of activities within Central - Nairobi, Coastal – Mombassa & Malinda and Eldoret - Rift Valley provinces respectively
Baselines and project activity instances 1.10	Baseline is identified for each project activity. Additionality covers all provinces and activities as described. The project confirmed this is done in line with the eligibility criteria set out in the project description.
Multiple activities in grouped project 1.3	The project has five plastic waste collection hubs and a recycling facility and includes multiple instances of waste collection and recycling that covered three provinces in Kenya with a target to increase across other provinces and the collection/recycling capacity after the validation process.
Baseline for each area	For the geographic areas in Kenya, for which the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya operates, a baseline scenario has been determined.
Additionality for each area 3.10	For the geographic areas in Kenya, Mr. Green Africa & Removall: Plastic waste reduction project in Kenya has successfully demonstrated additionality This was based on a regulatory overview and the penetration rates for recycling and collection activities.
Project area has common factors to justify one additionality argument	Areas determined have indeed similar regulatory frameworks and income levels. There is lack of policies laws that enforces the collection of plastic waste. There is lack of policies or regulations that enforce recycling of the relevant material type(s).
Eligibility criteria	The project consists of Multiple Instances of Multiple Project Activities as described in the Plastic Waste Reduction Standard v1.0.

2.1.4 Project Proponent and Other Entities Involved in the Project

The project description has vividly detailed the project proponent's and other entities involved in the project as per the tables below. The involvement of project partners was ascertained by review of the

contracts that have been signed between the project partners and Mr. Green Africa & Removall: Plastic waste reduction project in Kenya. These project partners and other stakeholders were interviewed to confirm their role in corroborating information in the project description report.

Organization name	MGA GROUP B.V.
Contact person	Yunia Bidal
Title	Chief Growth and Expansion Officer
Address	Prinsengracht 769 A 1017 JZ, Amsterdam, The Netherlands
Telephone	+254 792 613996
Email	yunia@mrgreentrading.com

Organization name	Removall SAS
Role	Removall played a role as a project advisor and authorised representative. Project developer of the Project Description and Monitoring Report. Coordination of project registration and validation and verification activities as a been assigned the responsibility for plastic credit transactions. Removall offers tailored solutions to help its customers contribute to the net zero transition by financing projects in line with their unique identities and strategies. Removall works daily with an ecosystem of actors committed to the net zero transition. As a player committed to preserving the environment, Removall also acts beyond carbon. It is also supporting companies and organizations in implementing innovative environmental contribution approaches geared towards the development of new impact finance tools. It develops plastic collection and recycling projects where it's urgently needed. These certified actions are in line with best practices from the plastic contribution market, enabling the financing of infrastructure and the improvement of living conditions in communities over the long term. Removall continues help companies and organizations to limit plastic pollution in a circular economy approach that complements internal reduction strategies, by enabling them to support high-quality collection and recycling projects.
Contact person	Côme FALQUE
Title	Project Manager – Innovative Environmental Assets
Address	86 boulevard de Sébastopol, 75003 PARIS
Telephone	+33 7 61 91 98 59

Email	come.falque@removall-carbon.com

Organisation name	Mr. Green Africa Kenya
Role	Mr. Green Africa Kenya is the first recycling company to be a Certified B Corporation on the African continent, leverages business as a force for good to realize sustainable, long-term social, environmental and economic impact through the collection, conversion and selling of post-consumer plastic waste. Its technology driven plastics collection model enables waste collection at the source, integrating informal waste workers, micro-entrepreneurs and consumers into formal value chain, increasing the amount of post-consumer plastic waste. Mr. Green Africa collects and provides stakeholders the chance to earn a fair, predictable and transparent income and benefits. Mr. Green Africa has world class processing equipment, housed at factory in Nairobi, allows Mr. Green Africa to convert locally collected plastic waste into high-quality PCR (Post Consumer Recyclates) and sell it as a substitute imported virgin plastics at competitive rates. To close the loop, Mr. Green Africa works closely with brand owners and third-party plastics manufactures to develop and execute three-way off take agreements for high quality PCR, helping FMCGs (Fast-moving consumer goods) and others realize their sustainable packaging goals by accessing ethically sourced, locally produced PCR. Mr. Green Africa has assembled the stakeholders, informed them about the project and sought their input, assisted local partners to improve and render safer & more efficient way of their operations, collected and authenticated all information needed to apply for plastic credits, verified all project activities, as well as consistently monitoring the Project. Specifically, Mr. Green Africa has collaborated with its partners to coordinate all collection and recycling data, monitor all activities along the supply chain from collection to final product and ensure full compliance of program activities, traceability, and chain of custody of the plastic waste to generate plastic credits. Mr. Green Africa also monitors the economic, social, and environmental impacts generated by project activities and assembles stakeholder meetings to inform, educate and evaluate all activities throughout the project. In addition, Mr. Green Africa oversees the traceability to avoid any risk of double counting or double claim on volumes collected and recycled. As well, Mr. Green Africa has provided or committed to financial and administrative support to its partners with respect to specific projects to improve operations and to provide educational programs to local communities (details provided in partner description). Mr. Green Africa receives technical support from Removall SAS as project partners in the implementation of the Plastic Standard v1.0 requirements to ensure project activity compliance.
Contact person	Yunia Bidal
Title	Chief Growth and Expansion Officer
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Telephone	+254 792 613996
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2.1.5 Ownership

Removall (through its associated legal entity, Removall SAS) has the legal right to control and operate the project activities provided to it by way of a Plastic Project MOU with Mr. Green Africa.

The Plastic Project MOU is an enforceable and irrevocable agreement that grants Removall the rights and control the sale of all plastic credits generated.

Mr. Green Africa Kenya Ltd founded in 2014, with certificate of registration (No 0032141 -07-23) of a workplace under the OCCUPATIONAL & SAFETY ACT, NO 15 2007 and business permit under the Nairobi County and its partnership with Removall mandates Mr. Green Africa owner for all instances to perform plastic waste recovery, processing, and recycling in accordance with the applicable Verra frameworks which is tailored in providing practical programs that create sustainable employment opportunities in rural and urban communities.

Project Instances operate private leased lands for its collection in accordance with host country policies and laws. The mechanical recycling site is located in Nairobi on private land with signed lease agreement documented and filed. Project proponents demonstrated during the validation process that they have the legal right to control and operate project activities. Ownership documents submitted and reviewed were in line with Section 3.4.1 of the Plastic Standard v1.0.

2.1.6 Project Start Date

The project start date confirmed through document review (including supplier data, collection data summary and sales per partner) and via interview with project management team was 1st July 2020, which is the date the project formally began project activities. From this start date, plastic waste was collected, processed, and remanufactured under the project design and in line with the requirements of the methods and the Plastic Standard v1.0.

2.1.7 Project Crediting Period

The Project Crediting Period is 7 years from 1st July 2020 to 30th Jun 2027 (twice renewable).

2.1.8 Estimated Collected and/or Recycled Plastic Waste

The project estimated collected and/recycled plastic waste were determined based on historical operational records provided by project proponent (Mr. Green Africa) and project's anticipated funding and plan for expansion. The project collected plastic waste was estimated based on the first monitored batches of plastic deliveries and the project's anticipated funding and plan for expansion. That includes an increase in suppliers joining the project, the project establishing new trading points and encouraging independent suppliers to sell collected plastic to the project. The monitored data and corresponding records (Waybills, invoices, data registry etc.) were reviewed during this assessment. The assumptions made were based on the factors mentioned above were also determined, and the estimates that were allocated to those assumptions were found to be reasonable. The calculation worksheets that were used for the arriving at the estimates, in which the monitored and projected data is aggregated, were then also reviewed and recalculations were performed to confirm the final estimates as provided in the project description report. On the basis of this review, it was concluded that the estimates as calculated by the project were reasonable and within an expected range considering the size and extent of the operations.

The amount and the estimated annual additional amount are described within the project description report as shown in tables below.

Table 1: Estimated net collected plastic waste volumes

Year	Estimated net collected plastic waste (tonnes)
2020	570
2021	2682
2022	3983
2023	5049
2024	8400
2025	12000
2026	18000
2027	9000
Total estimated amount	59684
Total number of crediting years (where applicable)	7
Average annual amount	8526

Table 2: Estimated net recycled plastic waste volumes

Year	Estimated net recycled plastic waste (tonnes)
2020	460
2021	1858
2022	2360
2023	3410
2024	7000
2025	10000
2026	15000

2027	7500
Total estimated amount	47588
Total number of crediting years (where applicable)	7
Average annual amount	6798

2.1.9 Project Location

The project takes place in Kenya, East Africa, specifically within the Central, Central - Nairobi, Coastal – Mombasa & Malinda and Eldoret - Rift Valley provinces respectively. The project implements multiple instances of multiple project activities (collection and recycling). Exact geolocation points (GPS coordinates) have been specified in a KML file in accordance with section 3.7.1 of the Plastic Standard v1.0.

GPS coordinates were taken during the on-site visits. These coordinates validated were in line with the GPS coordinates provided by the project Proponent, and the project activity instance locations as indicated in the KML file. The lead assessor as also reviewed the approval for project activities in the indicated project locations by recognised government entities (County Assembly and National Environmental Management Authority - NEMA. It was concluded that the project location specified is in accordance with the requirements of the Plastic Standard v1.0.

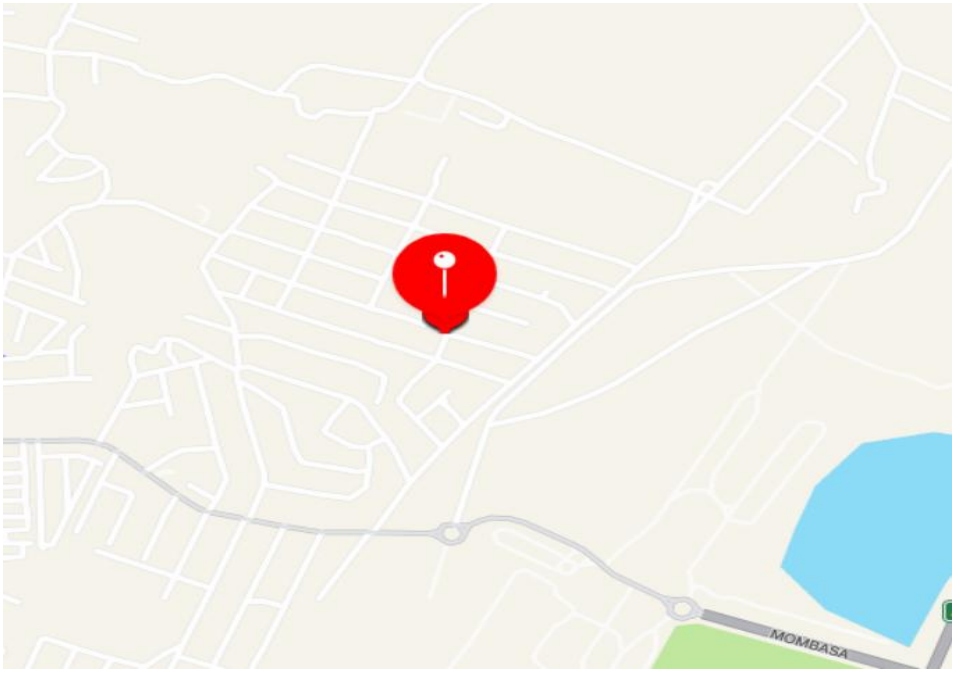


Eldoret Hub

0°34'54.0"N, 35°13'14.9"E



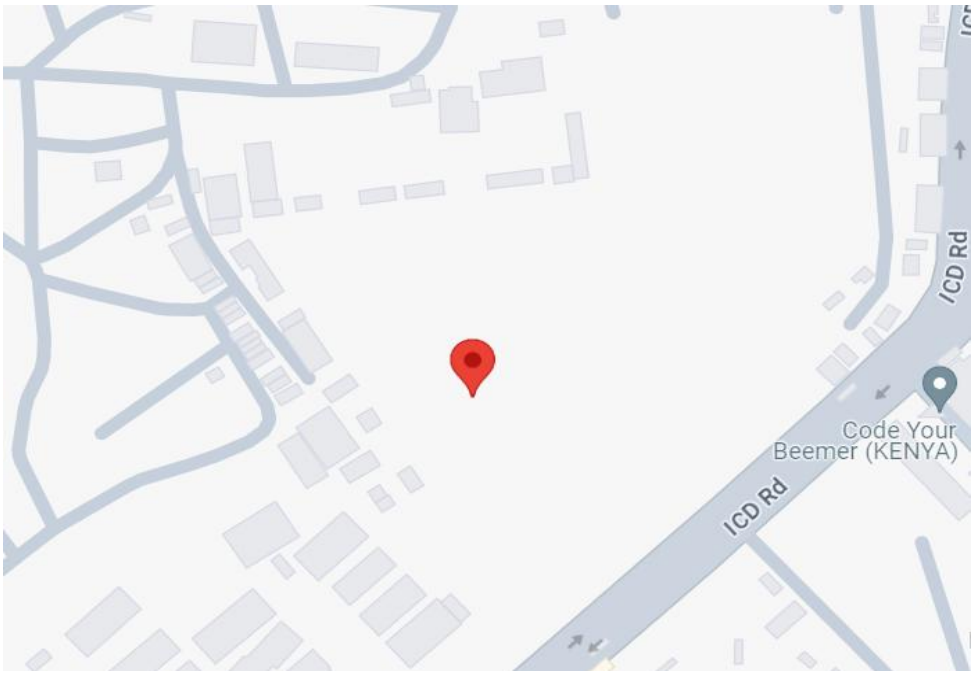
Bombolulu Hub
4°01'13.7"S
39°41'55.9"E



Bamburi Hub
3°59'58.9"S, 39°42'53.3"E



Malindi Hub
3°13'34.5"S, 40°06'46.3"E



Nairobi Recycling Facility
1°19'41.6"S, 36°51'56.1"E,

2.1.10 Conditions Prior to Project Initiation

Plastic pollution poses a major global threat to humans and the environment. At the present rate of population growth under a business-as-usual model, plastics production is estimated to double within the next 20 years (Lebreton, 2019). Due to high population densities in Asia and Africa, coastal communities in these regions produce a disproportionate amount of plastic waste (Lebreton, 2019).

Waste generation is low in Kenya compared to the world average: in 2018, the per capita waste generation rate was 11 kilograms per year, compared to the world average per capita waste generation rate of 29 kilograms per year (Paruta et al. 2020). However, 92 percent of that waste is mismanaged (Paruta et al. 2020). In fact, there are no collection services in rural areas (Paruta et al. 2020). This leads to leakage into terrestrial and marine ecosystems (Paruta et al. 2020). In terms of plastic, an estimated 37 thousand tons of plastic leaks into the ocean every year and 67 percent of that leakage comes from urban centers (Paruta et al. 2020). The problem is projected to get worse: by 2060, plastic generation will be 1.9 million metric tons per year (Lebreton, 2019).

The most common polymers leaked into the environment are polypropylene (PP), polyethylene terephthalate (PET), and polyester, mostly coming from nondrinking bottles, lids/caps, and dairy packaging (Paruta et al. 2020). The sectors that produce the most plastic waste are packaging, textiles, and automotive tires (Paruta et al. 2020). The most important pathways for single-use plastics (SUPs) into the environment are littering, storm water pathways, wind and water currents, and tides (ME&F, 2020)

In Kenya's capital city of Nairobi, an estimated 2,400 tons of solid waste is generated every day, 20% of which is in plastic form. Poor waste management, coupled with rising urban pressure, have heightened the risks of environmental degradation in the city of 4.4 million people. Of the waste generated by the city, only 45% is recycled, reused or transformed into a form which can yield an economic or ecological benefit, a far cry from the 80% target set by the National Environment Management Authority.

Also in Kenya, plastic waste has emerged as a significant environmental problem, with far-reaching concerns for ecosystems, wildlife, and human health. The widespread use and incorrect disposal of single-use plastics have polluted land, rivers, and oceans, posing major challenges to the country's sustainable development. Kenya introduced a ban on the importation, production and use of plastic bags used for commercial and household purposes through the publication of Gazette Notice 2356 in March 2017. Penalties stipulated for violations include fines amounting to $40,000 and prison terms of up to four years for the importation, production and consumption of SUP bags.

Kenya has also banned plastic bottles, straws and related products in all national parks, national reserves and conservation areas and any other designated wildlife areas. But there's been implementation challenges with the regulations.

Consensus on the scope of legislation is lacking; specific clauses and provisions are needed that target plastics, not only broad provisions on solid waste management and marine pollution prevention and their effective enforcement.

The scope of prohibited activity is often not clear within legislation, which carries the risks of legal challenge and uncertainty and lack of predictability.

The scope of covered plastic items subject to the ban in wildlife parks, reserves and conservation areas is not clear, which could pose challenges for implementation and enforcement once the ban takes effect.

A general prohibition on pollution of the marine environment (including dumping of plastic waste such as fishing gear) can be interpreted from provisions in Kenya's maritime, wildlife and fisheries laws related

to conservation, management, development and protection of marine, fisheries and wildlife resources within its maritime zone.

Kenya is developing extended producer responsibility (EPR) regulations that aim to establish mandatory EPR schemes for various products including plastics.

However, there is hope. Mr. Green Africa & Removall: Plastic waste reduction project in Kenya together with other stakeholders to tackle Kenya's plastic waste challenge by increasing awareness, implementing effective solutions, and mobilizing public participation.

Since the start of the project and the fact that plastic waste could be monetized there has been a noticeable reduction of plastic waste in public areas which was a major plague in most suburbs in counties where the project operates. Men and women within the project scope through interviews confirmed to have been able to collect the plastic from the environment while earning a decent living to be able to support their families with no discrimination against any gender in terms of earnings. Project has been able to formalize plastic waste collection system equipping its collectors with appropriate PPEs (boots, gloves, clothing, masks) which were evident during the site visit in protecting them from health complications. The sources cited by the project proponent on the labor conditions prior to project implementation, among others the labour conditions, Air, water, soil quality and ecosystems, Energy consumption and GHG emissions and human health, have been cross checked and confirmed accurate and reliable. Collection and recycling of plastic waste under the Mr. Green Africa project offers alternatives for these populations, offering a way to earn a living, whereas before the implementation of this project that would have been much harder. From this assessment, it can be concluded that the prior conditions of labor and working conditions (and improvements that have taken place since) are accurately described by the project.

https://www.worldbank.org/en/news/feature/2021/03/11/battling-kenya-plastic-waste-young-kenyan-woman-transforming-waste-into-sustainable-and-affordable-building-materials

https://www.radheplasticltd.com/plastic-waste-problems-kenya-empowering-change-through-sustainable-solutions/

https://unctad.org/system/files/non-official-document/tcsditcinf2022d3_fs2_en.pdf

https://leap.unep.org/en/countries/ke/case-studies/kenya

2.1.11 Compliance with Laws, Statutes and Other Regulatory Frameworks

The project has been approved independently by the government of Kenya and all county offices have also understood and accepted this project activity which was confirmed by the review of registration documents, contracts, and stakeholder engagements. The project activity has been implemented legally corresponding with Kenyan applicable laws and regulations. The entities involved in the project have been registered under Kenyan laws and regulations, including issuance of contracts and business registration documents. Laws, regulations, and codes applicable to the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya operational activities as indicated in the project description were cross referenced with the said documents and these were found to be laws within the Republic of Kenya and are applicable to the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya. The relevant regulations conforming with Kenyan laws within the project scope are displayed below:

Table 3. Kenyan Laws and Regulations

Law/Regulation	Demonstration of Project Compliance

Constitution of Kenya, 2010	The project is upholding its right to the constitution through plastic collection and recycling activities, ensuring a clean and healthy environment.
Environmental Management and Coordination Act (EMCA) of 1999 (last revised in 2018	MGA engaged with all relevant local authorities since these entities formally control the dumpsites and permission demands. MGA collaborates with the National Environmental Management Authority (NEMA) on Waste Management regulations to define waste management operations in the country and acquire the required permits to carry out its operations.
Occupational Safety and Health Act, 2007	MGA has established a detailed Health & Safety SOP. Safety trainings are regularly provided to the workers. A Health & Safety Committee is also implemented which was evident during the site visits.
Kenya Employment Act (2007)	MGA has workplace policies, including an employee code of conduct, in place that ensures compliance with Part III of the Act.
Minimum Wages Order (2002)	Employment contracts are in place with MGA workers that meet conditions of employment (Part IV). Payment records of employees verified onsite higher wages than the minimum wages.
The National Environment Policy 2013	The project promotes the use of economic incentives to manage waste thanks to its loyalty program
National Sustainable Waste Management Policy of 2021	The goal is to help ensure that waste is collected, separated at the source, reused, and recycled and that the remaining waste stream is destined to a secure, sanitary landfill. All plastic waste collected are transported to the recycling facility in Nairobi.
National Marine litter Action Plan, 2021	The project activities contribute to waste management ensuring plastic waste does not reach marine ecosystems that are a livelihood, especially to coast and lake region counties.
Nairobi County Waste Management Action Plan, 2021	The project contributes to the development of key structures to ensure waste management efficiency.
The Mombasa County Solid Waste Management Act, 2021	The project collects, sorts and transports plastic waste within the Mombasa County and transported to the recycling facility in Nairobi.

Sustainable Waste Management Act of 2022	The project is not involved in a mandatory EPR system. The project contributes to the settlement of Material Recovery Facilities across all counties.
The National Solid Waste Management Strategy 2015 (NEMA)	The MGA project has obtained approval from NEMA to carry out it's in the respective counties.The project regularly meets with NEMA for helping the establishment of the long-term goal waste recovery strategy.
Gazette Notice No. 2334 of 2017 (NEMA)	The projects aims to empower waste pickers to collect discarded plastic bags or single-use plastic items, bringing them for recycling.
Gazette Notice No.4858 of 2019 (NEMA)	The project activities promote the ban of specific single-use plastic items, plastic bottles, straws, and related products within protected areas in the national parks, national reserves, conservation areas, and any other designated wildlife protected areas.
International Labour Organisation Regulations	The MGA project was observed to provide international standards in promoting decent work, protecting fundamental worker rights (e.g., freedom of association, elimination of forced or child labor), and guidance for fair and safe labor practices globally, which the project origin (Kenya) incorporates into its national laws.
Regulation of Wages (General) Order 1982	MGA demonstrated compliance with all the general rules (wages, hours of work, overtime, rest periods). Contracts of employees verified onsite confirmed wages, hours of work, overtime, rest periods, and related employment conditions, complementing the minimum wage standards and protecting employees' basic rights.
Labour Relations Act (2007)	MGA has set up dedicated processes and efforts for formation and regulation of trade unions, collective bargaining, industrial action, and dispute resolution. Employees interviewed have an existing agreement with terms and conditions well explained and signed by both parties.
Work Injury Benefits Act, 2007	The project provides a framework for compensating employees who suffer work-related injuries or diseases, detailing the process for reporting, assessing, and paying out injury benefits or medical costs. There is also an Occupational Health Safety Policy in place binded by all employee ensuring accident-free environment during operational activities

In conclusion, Control Union Ghana confirms that the project proponent and its partners have registered with the appropriate government bodies and received the necessary authorisation/permits (approval letters from the government and county authorities which are compliant to the Environmental Code of Kenya to carry out project activities without facing penalties against any applicable law or statutory regulation.

All land uses in the project area have not violated any Kenya laws and regulations, and waste collection activity can access freely to public areas, including formal or approved authorization to collect waste from private areas. Project activities have been implemented in good cooperation with local collectors and recycling activities ensure that negative environmental and social impacts are prevented.

2.1.12 Additional Information Relevant to the Project

Additionally, commercially sensitive information has been excluded from the public version of the project description. Training attendance excluded due to names and contact information supplied. Project partner agreements and other contracts were removed due to sensitive financial information (expenditure, budgets etc) as well strategic management plan. It was necessary to exclude this information from the public version because the sensitive information it contains could affect the ability of the project proponent to work competitively.

2.2 Stakeholder Engagement

2.2.1 Stakeholder Identification

Stakeholders were described by Mr. Green Africa & Removall: Plastic waste reduction project in Kenya as any individuals, companies, organizations or government entities who either impact or are impacted by Mr. Green Africa activities at any stage in the process during its lifespan, from the collection to the sales of the recycled products. The first step in the process of stakeholder engagement was stakeholder identification–determining who the project stakeholders are and their key groupings and sub-groupings. From this flow's stakeholder analysis, a more in-depth look at stakeholder group interests, how they will be affected and to what degree, and what influence they could have on within the project. The answers to these questions provided the basis on which MGA built its stakeholder engagement strategy. Here, the project management explained that it was essential to keep in mind that not all stakeholders in a particular group or sub-group necessarily shared the same concerns or had unified opinions or priorities

A systematic approach was adopted by the project, starting with delineating the project's geographic sphere of influence. Here, not only about the primary project site(s), but also all related facilities, including associated facilities, transport routes, areas potentially affected by cumulative impacts, or unplanned but predictable developments. This analysis was used to establish and articulate the project's area of influence and determine who might be affected and in what way.

This process began to reveal those most directly affected by the project, whether from the use of land at the project site or the effects of air and water emissions, from off-site transportation of hazardous materials, or even the socio-economic impacts of job creation throughout the supply chain. By mapping the sphere of influence of different types of environmental and social effects, the project can begin to identify distinct groups by impact area and, from this, prioritize stakeholders for consultation. Priority was given to individuals and groups in the project area who are directly and adversely affected, drawing the line between who is affected and who is not.

Mr. Green Africa through interviews with identified stakeholders was confirmed to have established a professional and good relationship with each stakeholder group because of its strong on-ground presence and constant consultations and feedback redress system implemented. Mr. Green Africa has put in place locally appropriate methods to identify all stakeholder groups. This identification process included word-of-mouth, through well-established relationships with key local partners.

More specifically, Mr. Green Africa pays particular attention to informal waste workers and was able to identify with the support of its partnerships with local community groups and NGOs.

More formal stakeholder groups were contacted through email, WhatsApp and scheduled calls, and or met during business events. Mr. Green Africa has established a holistic stakeholder engagement procedure, that allows for stakeholder identification, engagement, and reporting.

The analysis of the documented identification procedure and interviews with selected stakeholders involved in the project found that due diligence was applied in the stakeholder identification process, considering interested and relevant parties, potentially affected groups, local community organizations, and NGOs.

2.2.2 Stakeholder Description

Table 4. Stakeholders and their relevance to project

Stakeholder group	Description
Informal Suppliers	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.
Consumer Ecosystem	MGA collects available plastic waste which correspond to local commercial entities and households (buy-back centres).
Local authorities	MGA held discussions with relevant local authority, such as the Nairobi City County for building permits, the National Environmental Management Authority (NEMA) for the license to operate in the respective project locations, the Occupational Safety and Health Services of the Republic of Kenya for registering the workplace. MGA has also established regular engagements with the National Environmental Management Authority (NEMA) on Waste Management regulation, for better defining waste management operations in the country. **Communication channels:** face to face meetings, online meetings, emails, WhatsApp, events **Local Stakeholder Consultation:** at the factory in Nairobi and during online meetings MGA activities are carried out in multiple geographical areas within Kenya and has established strong links with local communities to gather their opinions and feedback on the project. MGA is working with the Kenya National Waste Pickers Welfare Association to ensure waste pickers get fair prices (through collective bargaining), enjoy human rights as they source and deliver plastic, and receive

	empowerment throughout their interactions with MGA. **Communication channels:** physical visits, WhatsApp, informal discussions **Local Stakeholder Consultation:** at the factory in Nairobi and during dedicated Tea Parties at each Collection Hub
Local NGO	• MGA partners with local NGOs on different subjects: Along with Challenge Fund for Youth Employment to provide sustainable income and jobs for youth. • Also, with the Danish Refugee Council to provide a sustainable income for refugees while having a positive impact on the environment as confirmed during interviews with NGO representative.
Local communities	MGA is present in multiple geographical areas within Kenya and has established strong links with local communities to gather their opinions and feedback on the project. **Communication channels:** physical visits, WhatsApp, informal discussions **Local Stakeholder Consultation:** at the factory in Nairobi and during dedicated Tea Parties at each Collection Hub
Small-scale informal recyclers	The informal recycling sector comprises all kinds of unregistered workers engaged in the collection, recovery, and recycling of waste. The industry is typically characterized by small-scale and unregulated recycling activities, providing a source of income for poor and marginalized workers. However, it is increasingly recognized as consisting of entrepreneurs and established micro-businesses that are highly skilled in their occupations. Informal recycling workers constitute a particularly vulnerable livelihood group. Socio-economic precarity, a negative perception of its work, and marginalization tend to be particularly acute at the lower levels of the informal recycling ecosystem. Informal waste pickers, collectors, and sorters are exposed to occupational health hazards when working without adequate training or access to safety equipment. Women and children are particularly vulnerable, as they are overrepresented in labor-intensive, low-earning, and hazardous occupations. Beyond addressing the structural vulnerabilities of informal recycling workers and efforts to integrate them into public and/or private waste management systems, MGA has considered the larger informal recycling ecosystem,

	including material flows, informal supply chains, and complex trade relations both within and between informal and formal waste management actors
Direct employees	MGA employs the local population in its sorting and recycling facilities as part of its recruitment process and social responsibility within the locations they operate
Main Plastic Producers	MGA collaborates with a vast network of plastic producers who purchase MGA's recycled plastic flakes and pellets to manufacture products which displace the use of virgin plastic. MGA has been able to secure long-term contracts with Main Plastic Producers. The secured revenues from recycled plastic purchases enable MGA to provide a fair pricing system to the informal waste pickers. Therefore, Main Plastic Producers stakeholder group is relevant to project design.
Kenya National Waste Pickers Welfare Association	MGA is working with the Kenya National Waste Pickers Welfare Association to ensure waste pickers get fair prices (through collective bargaining), enjoy human rights as they source and deliver plastic, and receive empowerment throughout their interactions with MGA. **Communication Channels:** physical visits, online meetings, WhatsApp, informal discussions **Local Stakeholder Consultation:** at the factory in Nairobi
Kenya Association of Waste Recyclers ((KAWR)	Kenya Association of Waste Recyclers (KAWR) is a registered non-profit organization established in 2017 under section 10 of the Societies Act with a membership base across the country. Members consist of players at different levels of the recycling value chain, such as – Waste pickers – Collectors/site managers – Transporters – Value addition (sorting, crushers, washers, pelletizers) – Converters/Manufacturers – Other interested parties. As an organization, they concentrate on sharing knowledge among their members and other stakeholders on the most efficient recycling approaches as one of the workable solutions to the waste management problem facing this country in

	order to achieve a circular economy in resource utilization. The organization members recycle various types of materials that have completed their service use or were previously used for packaging other products, including **Plastics:** Polyethylene terephthalate (PET), High-Density polyethylene (HDPE), Polyvinyl chloride (PVC), Low-Density Polyethylene (LDPE), Polypropylene (PP), Polystyrene.

To verify the stakeholders identified by the project proponent, the project management team provided a list of relevant stakeholders. This list was compiled through interviews with the project team, focusing on how the project would impact and influence these stakeholders, as well as the benefits they might gain. The project proponent then refined this list, considering how each stakeholder could contribute—either positively or negatively—to the project. Following this analysis, a systematic engagement process with the identified stakeholders commenced. This involved direct communication and visits to their offices, locations, or events, during which the project's significance to the community and its role in reducing plastic waste and protecting public health and the environment were clearly communicated.The validation team sampled and interviewed from the list provided based on how positively/negatively these stakeholders could contribute to the project as described by the project proponent. In accordance with the knowledge obtained through interviews with the project team and review of the monitoring report, the waste suppliers, local communities and recyclers were identified to be vulnerable and included in the sample and confirmed with them if they have been engaged by the project proponent per meeting minutes received from the project proponent during the engagement process. MGA has also identified the Association of Waste Recyclers (KAWR) as an independent group of interested stakeholders. The Association represents various stakeholders in Kenya's recycling industry, including informal and formal recyclers. While KAWR is acknowledged as an important entity in the waste management ecosystem, MGA does not directly collaborate with any of its stakeholders. Direct relevance of the Association to this project was assessed based on the alignment of the project's goals with stakeholder practices. The small-scale recyclers were interviewed through their representative (Richard Kainika - Kenya Assocation of Waste Recyclers) who claimed that MGA price rates for plastic waste were high and wanted to understand what makes MGA pricing on plastic waste materials were higher than other recyclers. During the interview, views on the marketing pricing system as well reasons why these claims made were assessed. Further verifications through interviews with waste pickers and suppliers who forms part of the Kenya Association of Waste Recyclers, it was determined that 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. MGA conducts market pricing surveys. The survey report reviewed highlights weekly pricing trends in the various project locations as well as price changes per plastic type. The project also studies and monitors the average price trends for previous months. Based on these results, MGA is able to establish the average selling price for each plastic type and anticipate price changes in subsequent weeks. Contrary to what is being claimed in the public comments, the local community representative interviewed confirmed that MGA plastic prices and that of the markets have no significant difference. However, they prefer to sell to MGA because they receive cash equivalence on products immediately, unlike other places where they have to wait for several days/weeks before receiving their monies upon making deliveries.

Interviews with sampled waste suppliers, local community representative and recyclers at the collection center visited, and with managers of the recycling facility and hubs during the onsite visits affirmed that there had been effective communications between these identified stakeholders and the project proponent and due diligence were made with corresponding meeting minutes evident to support the engagement process with these stakeholders. Upon completion of this assessment, it was concluded

that the stakeholder identification process was deemed effective, and the stakeholder description is accurate and complete. The validation team interviewed almost all stakeholders privately without presence or interference of MGA and Removall management and where in person interviews could not be feasible and phone interview was scheduled to ensure information provided by the project proponent corroborated with what was collected onsite.

2.2.3 Stakeholder Consultation

Mr. Green Africa & Removall: Plastic waste reduction project in Kenya established consultation process through meetings, presentations, and training related to the project activity with stakeholders. Control Union reviewed these minutes, pictures with timestamp and presentations recorded during those meetings for sample of the locations where these activities took place. These were part of the documents shared by established consultation process through meetings, presentations, and training related to the project activity with stakeholders. Control Union reviewed the minutes, pictures with timestamp and presentations recorded during those meetings for sample of the locations where these activities took place. These were part of the documents shared by MGA project.

It was gathered through interviews with project management team during the assessment period by the VVB that the project set its sights on the impoverished neighbourhoods in Kenya specifically (Bamburi, Bombolulu, Eldoret, Malindi & Nairobi) and its environs where some of the most vulnerable and marginalized people live, with the goal of easing up the burdens of poverty through employment, income, training, and awareness building. The project then started its engagement with the stakeholders prior to its operations in achieving set objective, and to build the waste collection network. The stakeholder consultation process was spearheaded by the project's management supported by a team of coordinators working in the field.

The project maintained an "open door" approach, focusing on clear verbal communication to accommodate those with low level of literacy, providing translators where necessary. Additional meetings, gatherings, Q&A sessions were scheduled and supporting information provided as requested. The project also ensured potential, interested, and relevant stakeholders influence by directly involving individuals and representatives in its day-to-day operations.

Counties identified to be impacted by the project played vital role in the project's consultation process and in enabling meaningful stakeholder influence. The meeting minutes reviewed confirmed that an engagement with stakeholders was held in Nairobi on March 6, 2024. All stakeholder groups were informed at least two weeks in advance through the regular communication channels. The stakeholders' consultation process included face-to-face meetings with all the stakeholder groups identified. All stakeholder groups, including local authorities, local communities, and recyclers, were represented at the meeting. Representatives from each collection hub (thus Bamburi, Bombolulu, Eldoret & Malindi) were in attendance during the initial engagement. Subsequent meetings took place in each collection hub, during which the hub managers used tea parties to explain the project and its activities to the waste pickers and their feedback obtained. Each county had its own stakeholder engagement requirements for its community initiatives and in turned out those became the prerequisite of the project. The focus was on defining and engaging with a "Community of Beneficiaries", identifying those stakeholders who are vulnerable, marginalized, have low literacy. For instance, representative of the Danish Refugee Council and Africa Inland Child & Community Agency for Development (Aiccad) during interview confirmed to be part of the engagement process and described the collaborative approach with MGA in identifying contributors for their child referral pathway program in keeping children from plastic waste collection activities.

Adequate effort was made by the VVB to reach all stakeholders to determine compliance by the project.

Interviews with representatives described in 1.8 of the validation report confirmed that, at the meeting, the project's collection and recycling instances, as well as the plastic credit certification process, were explained to all the stakeholders. The impending validation assessment was also emphasized, as well as the detailed Feedback & Grievance Redress procedure associated with the project.

The various stakeholder groups were informed about the potential costs, risks, and benefits of the project. As an example, the possible benefits of the plastic credit program cited during the subsequent engagement included:

- Recycling a large variety of plastic types at a more significant quantity: buying more plastics from the waste pickers, hiring new employees, strengthening partnerships with manufacturers
- Providing more stable prices for plastic waste sourcing, ensuring more regular income for waste pickers
- The project's infrastructure being expanded, requiring landlords to lease more space, which will generate more revenues for them.

Feedback sessions were confirmed to be held, allowing all the stakeholders to ask their questions and address their concerns, as described in the meeting minutes reviewed.

Interviews with small-scale recyclers representative (Richard Kainika,- Kenya's Association of Waste Recyclers, and John Chweya,- Kenya's National Waste Pickers Welfare Association) revealed a significant concern about pricing. The stakeholder (Richard Kainika,- Kenya Association of Waste Recyclers) claimed that MGA price rates for plastic waste were high and wanted to understand what makes MGA pricing on plastic waste materials higher. Kenya Association of Waste Recyclers (KAWR) is a registered non-profit organization established in 2017 under section 10 of the Societies Act with a membership base across the country. Members consist of players in different levels of the recycling value chain, such as waste pickers, collectors/site managers (Viwanja People), transporters, value addition (sorting, crushers, washers, pelletizers), converters/manufacturers, and other interested parties. As an organization, they concentrate on sharing knowledge among our members and other stakeholders on the most efficient recycling approaches as one of the workable solutions to the waste management problem facing this country in order to achieve a circular economy in resource utilization. Richard Kainika expressed that the organization members recycle various types of materials that have completed their service use or were previously used for packaging other products, including (Plastics (thus PET, LDPE, PVC, PP, HDPE, and Polystyrene); members are grouped into two tiers based on the respective activities they perform. Tier 1 members are made up of waste pickers/reclaimers, and Tier 2 members are the aggregators. The organization, through Richard Kainika, explained during the interview that MGA buys directly from the pickers, cutting off the aggregators and threatening their business. Through interviews with waste pickers and suppliers, it was determined that there is no structured system in place for deciding 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.

Further investigations into MGA operations during the onsite assessment revealed that one of MGA's key objectives is to enhance the living conditions of vulnerable populations. Also, as part of its social impact contribution to the county through the project, it strives to bridge the living wage gap through fair trade and compensation for all its partners, thereby instituting a loyalty program, making It a first trade choice when it comes to plastic waste. MGA seeks to remunerate its partners fairly, which goes a long way in supporting them in the provision of food, shelter, clothing, and security.

The assessment of the consultation procedures and discussions from stakeholder interviews confirmed that the project’s approach was suitable for each stakeholder group. This process is viewed as a common and traditional method of communication, adapting its strategies based on the characteristics of each group—for instance, using primarily verbal communication for stakeholders with lower literacy levels. The project effectively disseminated information about potential costs, risks, and benefits to each group, and it was verified through interviews and meeting records that all stakeholders had opportunities to influence the project design.

The project demonstrated a commitment to maximizing benefits for marginalized and vulnerable groups, such as waste suppliers and their families, by providing them with a stable source of income. Previously, the market for plastic waste lacked structure, with the highest bidder controlling the sourcing process.

Interviews with waste suppliers revealed that negotiation skills were crucial for determining the value of collected materials; better negotiation led to higher prices for their goods. However, the project has introduced stability in waste value for these recyclers and suppliers, ensuring transparency through weighing scales that display the weight of plastic waste delivered, and enabling a collective bargaining approach. Pickers reported that they could unite to negotiate prices and that their concerns were addressed by management. Consequently, it was concluded that the stakeholder consultation procedures and operations align with the requirements of the Plastic Standard v1.0.

2.2.4 Free, Prior and Informed Consent

Waste collection activities are mainly carried out in public areas, households, landfill, and dumpsites or through formal agreements with county offices where collection points are established. There are lease agreements where recycling facility, collection hubs and trading points are instituted and recycling and collection activities taking place. For these activities, consent have been given by the county offices as authorization for collection activities to be carried out within that county. The evidence of consent covers the areas in which these project locations and activities occur. All consent agreements signed with the recommended entity of the areas, including government sectors who are responsible in those areas. During the stakeholder interviews the following points were addressed related to consent:

- Knowledge of the project and plastic credit activities supporting it.
- Knowledge of the procedures in place for grievances and the code of conduct.
- Confirming project partnership agreements and activities.
- Project impacts since its initiation.
- Community response towards the project.

Stakeholders were sampled from various locations visited onsite and interviewed to confirm authorization of consent and assess knowledge on project existence and its activities. The stakeholder procedure does outline clearly how to deal with certain stakeholders in the different project areas. These include local communities, government etc. This specifically means: the stakeholder procedure reviewed outlined list of potential and relevant stakeholders determined by the project proponent. The list included community leaders/representative, government bodies, waste suppliers.

The list through interviews with project team was gathered to be developed based on how the project was going to impact, influence and what they tend to benefit from the project. Engagement process was unique per project county area. In every county where, the government was identified to be in charge with the waste collection activities, hence the county offices consent was required to be sought after by the project proponent to be able to carry out its operational activities. Direct communication and visits to their respective offices/locations were adopted and clarifications of project and its importance to community and achieving the government's goal to reduce plastic waste, protect public health and the environment was communicated during these meetings. The VVB confirmed that MGA had obtained consent, either written and/or verbal, from the project partners and other stakeholder groups whose rights may have been affected by the project activity although there was no evidence recorded, observed, or verified through interviews on any such occurrence.Thus No property rights are impacted by any of MGA's collection and recycling instances.

2.2.5 Continued Consultation and Adaptive Management

On assessment of the project's plan for continuous consultation, MGA and Removall devised an ongoing consultation process to appropriately aid in identifying and engaging with Project stakeholders throughout the life of the Project. As the initiative described, the organisations undertake a stakeholder identification process each monitoring period to ensure stakeholders (and their impact) remain relevant. The consultation process has been tailored to each stakeholder group with communication channels by call, email, WhatsApp or word-of-mouth. In-person stakeholder consultation meetings are completed with more regular internal and external communication.

As carried out during its initial consultation with all stakeholders at the start of the project, such consultations were confirmed through interviews with project management to be repeated frequently in order to gather the updated opinions of each stakeholder. In case of future addition of a new instance, engagement process similar to the first consultation was scheduled to the one organized. For the plastic credit certification process, MGA has introduced briefing of casuals during Toolbox meetings (daily meetings before every shift). MGA has also engaged with the external hotline service SPEAKOUT which was observed to be displayed at all central locations visited onsite since 2022 for collecting feedback and improve management activities.

MGA's internal processes for Stakeholder Engagement, together with indicators reporting, allows management to follow and track stakeholder's input on an ongoing basis and adapt strategy to address concerns accordingly. Tea Parties were organized at every trading point once a week. During those Tea Parties, feedback were shared from the waste pickers to MGA Sourcing Coordinator.

A certification communication plan (Generally speaking) allows stakeholder groups to provide feedback and express their degree of involvement in the project. Each milestone of the certification process is also communicated to all stakeholders through the various communication channels.

Interviews with sampled stakeholders during the onsite visits affirmed that there had been effective communications through direct meetings between these identified stakeholders and the project proponent and due diligence have been made with corresponding meeting minutes evident to support the engagement process with these stakeholders. Based on this information, together with the project's reviewed plan for continued consultation and adaptive management, it is concluded that the project is committed in its continuous consultation with all stakeholder groups and adapt management based on the received input.

2.2.6 Anti-Discrimination

Mr. Green Africa & Removall: Plastic waste reduction project in Kenya operated under a strict anti-discrimination policy. A code of conduct policy Code of Conduct policy that includes a strict non-discrimination statement, diversity, equity and inclusion, harassment, bullying and discrimination and the sexual harassment policy and complaints procedure are made available to all project partners and are expected to comply. The policy was also designed to incompliance with Equality and freedom from discrimination provisions of Chapter Four - The Bill of Rights Part 2. Rights and fundamental freedoms of the constitution of Kenya. The responsibility for effective implementation of the ethics policy is the sole responsibility of the HR- human resource. The ethics policy is accessible to all staff and made available to any party on request. It was observed during the site visits that; MGA has women employees fulfilling a lot of management positions. During interviews with employees, no evidence of discriminatory issues was uncounted/recorded by the procedure as requires and non was observed during site visits and facility tour. Pictograms depicting non-discriminatory actions and other forms of abuse were seen displayed and recycling facilities during site visits. Interviews with representatives of all entities involved in the project, including some of the suppliers who sell these plastic wastes to the collection hubs also confirmed no discriminatory actions. During the documentation review no documents were found that violate the antidiscrimination policy. The anti-discriminatory mechanism of MGA verified considered the following key aspects:

- **Policy Framework**: An established, clear anti-discrimination and anti-harassment policy is essential. The policy outlined unacceptable behaviors, defined discrimination and harassment, and specified consequences for violations.
- **Training and Awareness**: Regular awareness-raising sessions are held for all project personnel, including stakeholders and contractors, to help keep everyone informed about discrimination and harassment issues. The training covers recognizing inappropriate behavior and understanding reporting mechanisms.
- **Screening and Vetting**: Implementation of thorough screening processes for all entities involved in the project. This could include background checks, reviewing past conduct, and assessing potential partners' policies to ensure they align with anti-discrimination standards.
- **Reporting Mechanisms**: Create accessible and confidential reporting mechanisms for individuals to report incidents of discrimination or harassment without fear of retaliation. This could involve anonymous hotlines or designated personnel for handling complaints.
- **Monitoring and Evaluation**: Regular monitoring of the project environment and periodic evaluations can help identify any issues related to discrimination or harassment. Feedback from project participants should be encouraged to assess the effectiveness of the implemented measures.
- **Accountability**: Established clear accountability measures for addressing complaints. This includes having a dedicated team or individual responsible for investigating claims and taking appropriate action against offending parties. Hotline service SPEAKOUT since 2022 provides independent feedback and grievance redress procedures to its stakeholders.
- **Stakeholder Engagement**: Involve community stakeholders in discussions about discrimination and harassment. Their insights help tailor culturally sensitive and effective measures.
- **Continuous Improvement**: Commitment to continuously review and improve policies and practices based on feedback, incidents reported, and evolving best practices in the field.

Based on these implementing measures, the project has significantly reduced the risk of discrimination and sexual harassment, fostering a safe and inclusive environment for all involved.

2.2.7 Feedback and Grievance Redress Procedure & Accessibility

It is Mr. Green Africa's policy to maintain a harmonious working environment which affords equality of opportunity. MGA recognises the right of employees and stakeholders to express their concerns about project and work-related issues and has established an official avenue to resolve all grievances and complaints in a fair and timely manner. The Feedback and Grievance Redress procedure is explained in the Local Stakeholder Consultation support. The support was presented during meetings and shared to all the stakeholders thereafter, with clear identification of the main points of contact.
For grievances on the plastic credit certification process, MGA has introduced briefing of casuals during Toolbox meetings (daily meetings before every shift), during which MGA employees can report their feedback or grievance directly to their site manager. MGA has also engaged with the external hotline service SPEAKOUT which was observed to be vividly displayed at all central locations since 2022 for providing an independent feedback and grievance redress procedure to its stakeholders.

In addition to the official procedure, regular communication is maintained by MGA to provide constant feedback to the project proponents. Internal communication goes through emails to discuss meetings details, WhatsApp messaging for general information on operations and with other departments and telephone calls for more urgent matters. External communication goes through phone calls for supplier-customers relations, Bulk SMS for all suppliers and verbal communication are used by to MGA's coordinators when suppliers are not well acquainted with the language or technology.

In assessing the project's feedback and grievance redress procedure, the existing procedures were examined with the current feedback and grievance redress policies to understand the framework, assess clarity, accessibility, and effectiveness in addressing concerns. Subsequently, stakeholders, including

project participants and beneficiaries, were engaged to gather insights on their experiences with the procedures through interviews to evaluate how the grievance mechanism is assessed considering language, cultural appropriateness, and whether multiple channels (e.g., online, in-person, anonymous) are available for reporting issues. Response times for grievances lodged were 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 through interviews with employees and suppliers onsite to confirm the outcomes of grievances filed, review whether issues were resolved satisfactorily and determine whether the solutions were communicated effectively to the complainants. From responses received during the interviews and observations made onsite with displayed commitment mechanisms, e.g., hotlines, SMS, WhatsApp, and incident reporting email, it was deemed that all actors within MGA were well informed on the project's feedback and grievance redress procedures established. However, no cases were recorded at the time of the audit. Training and awareness activities are carried out for all actors within the project to evaluate whether project staff and stakeholders are adequately trained in the grievance procedures. Awareness campaigns may be necessary to ensure everyone knows how to report issues. A system for documenting grievances and tracking their resolution is established, and a committee is set up to help identify patterns and areas for improvement. Feedback loops have also been implemented to gather user feedback on the grievance process itself, allowing for continuous improvement. Reporting mechanisms are in place to ensure that grievances are reported using precise, transparent mechanisms and that these are communicated effectively to all stakeholders.

It was concluded that systems have been put in place to assess the feedback and grievance redress procedure comprehensively.

2.2.8 Stakeholder Access to Project Documentation

Other than the project documentation being publicly available through the project's page on the Verra Registry, the project proponent also adopted numerous pathways for project documentation dissemination. There are leaflets with links to Verra Registry project listing where all project documentation can be found, along with project personnel contact information. The project operates in most communities where majority cannot read no write the language though all documents pertaining to the project is written in English and to resolve this challenge. One-pager poster on plastic credit project have been translated into Swahili (local language) and shared to the various stakeholders by email, as well as printed and distributed at each collection site. Management has adopted engagement of most stakeholders on face-to-face meetings and plan to transform materials into local languages and as part of the public awareness creation. Assessment of information gathered during validation and verification process confirmed the project is committed to ensuring continual accessibility of project documentation to all stakeholders in a timely manner.

2.2.9 Information to Stakeholders on Validation and Verification Process.

Project partners are contacted prior to all validation and verification site visits, and they in turn disseminate all information to their team and relevant community members. They are responsible for handling communication within the project and preparing site visits including but not limited to informing all relevant stakeholders of the Plastic Credits Program. Specifically, project team do ensure communication in numerous instances via face-to-face meetings and the steps taken to obtain project validation as well as explaining the plastic credits program to obtain feedback and suggestions on how the issuance of plastic credits could be used to invest back into their activities not only for expansion but to improve the quality and safety of the workplace. Before every audit site visit audit, the site managers are verbally informed at least two weeks in advance, as soon as MGA gets confirmation from the auditor. An official email notice is then sent to the site managers, at least a week in advance, and the site

managers are responsible for informing their employees and stakeholders implied. A final reminder is sent the day prior to the actual site visit, with the contact of the auditor and any other participant of the site visit. Stakeholders and project partners during the site visits confirmed that they were informed of the validation process through face-to-face meetings, phone calls and emails. The project partners then cascaded this information verbally, in person, to their respective supporting teams and the community members involved. The information on the validation process to stakeholders and project partners took place days to a week earlier to the actual visit. Review of email communications with sample stakeholders confirmed that prior knowledge on validation process by established had been established and there is the likelihood of such approach been used in the future.

For this validation specifically, the project staff explained that a 3rd party evaluator will come to evaluate the Program and will be interviewing stakeholders individually and in groups, making the assessment process very easy for the audit team because stakeholder groups already had knowledge on the audit proceedings and activities that was going to take place, as confirmed during the interviews onsite.

2.3 Safeguards

The Duke Nicholas Institute for environmental policy solutions reported that 92% of plastic waste is mismanaged in Kenya – representing a total of 465,000 tonnes per year. Even though plastic waste generated is low in Kenya compared to the world average, it is projected to increase by 2060, plastic generation will be 1.9 million metric tonnes per year. In rural areas, waste management infrastructures are missing. There is no minimal recovery and no collection services, resulting in around 37,000 tonnes of plastic waste leaking into the ocean every year. Plastic waste flows into waterways, endangering aquatic biodiversity and releasing harmful chemicals into the surrounding soil, which can then seep into groundwater or other surrounding water sources, and the larger ecosystem. This causes a range of potentially harmful effects on the species that drink the water. Collected plastic waste in urban areas are mostly put in unsanitary landfills or dumpsites. They do not include proper ecological precautionary measures such as wastewater treatment or landfill sealing. Nairobi's Dandora dump site is one of the largest in Africa. It covers approximately 30 acres and is the destination of about 850 tonnes of solid waste generated daily by the city. Open burning of mismanaged plastic waste in Kenya poses significant risk for human health, due to the release of noxious chemical substances such as dioxin and particulate matters. It also directly contributes to climate change. Mismanagement of plastic waste also impacts animals – and therefore the whole food chain. A study by the National Environment Management Authority (NEMA) in 2018 found that 50% of livestock slaughtered in Nairobi's abattoirs had plastics in their stomach and all these instances contributes negatively to the environment. MGA undertook a safeguard analysis to identify negative impact on the natural environment or local communities. Waste recovery and management activities pose potential risks to health and safety, especially for informal workers such as waste pickers/suppliers. Waste collection environments can be hazardous, with common hazards such as moving machinery and plant, hazardous waste, and infectious diseases. The nature of the work can also lead to injury, especially ergonomic and musculoskeletal strains, as well as have social and emotional wellbeing implications for waste pickers, including stigmatisation.

Kenyan informal waste sector is responsible for most of the waste management activities in the country. Informal waste pickers are collecting recyclable materials mainly from homes, businesses, or illegal dumpsites. They then sell the plastic waste to trading points for recycling at a price that fluctuates a lot. As their revenue streams are not guaranteed, many waste pickers live in informal settlements or are homeless. They usually do not have the necessary equipment for collecting plastic waste from toxic dumpsites – and are therefore exposed to toxic chemicals. Studies have shown that serious illnesses like diarrhoea, malaria and infections of respiratory system have also been associated with populations living near dumpsites. MGA project intends to impact the environment positively and as part the of the organization's social responsibility, improve lives.

Documents reviewed showed that occupational Health and Safety Training has been carried out for all workers allowing the VVB to conclude that the safeguards of the workers were positively taken into account. The aim of this training was to provide MGA staff and waste pickers an understanding of the hazardous nature of plastic waste collection, and the appropriate safety measures to take to mitigate these risks. This included how to use Protective Personal Equipment (PPE). This training has been designed in a 'train the trainer' system to ensure knowledge can be passed down to others. MGA also has an employee handbook accessible to all employees which outlines the policies, procedures related to human resource management. This handbook includes policies on harassment, workplace violence, dispute resolution and employee among others.

2.3.1 Health and Safety

MGA acknowledged that waste management often poses risks to the environment as well as human health and in light of that, the need to safeguard against any potential threat/risk within the project scope including but not limited to health and safety, and to consider the need to safeguard workers and promote their welfare. Within a broad spectrum of the project, it sought to identify and map service development interventions (excluding provision of training) aimed at improving awareness and identifying measures designed to protect health, wellbeing in work settings. Waste collection environments can be hazardous, with common hazards such as infectious diseases. The nature of the work can also lead to injury, especially ergonomic and musculoskeletal strains, as well as have social and emotional wellbeing implications for waste pickers, including stigmatisation.

In addition, to the above potential hazards and risks associated with the project's plastic collection and recycling that needed to be mitigated, there were also associating risks that had also been identified by the project such as risks of fire and collapsing mountains of rubbish associated with collection of plastic from landfill (where poorly engineered and managed),decomposition of organic waste, acids, insecticides, chemicals and solvents which may be harmful to waste pickers, waste pickers possibility of exposure to disease vectors such as mosquitoes that can cause typhoid, malaria and materials such as broken glass and sharp objects being present as an hazard for the waste pickers and processors during collection activities and as such MGA and Removall has shown commitment to providing a healthy and safe work environment for waste pickers, workers and visitors as a part of the project initiative under the Waste Reduction Program.

There an Occupational Health and Safety Policy in place. This policy solidifies MGA and Removall's commitment to providing a healthy and safe work environment for waste pickers, workers and visitors as a part of the project's initiative under the Waste Reduction Program. Its intention is to significantly minimise the risk of occupational health and safety hazards by implementing prevention and mitigation measures. The policy also the policy complements the requirements under the Occupational Health And Safety Act No 15 2007 of Kenya. As part of the policy implementation actions, an assessment on potential risks has been carried and preventive/mitigations measures instituted to curb all risks identified. Waste picker guidelines are also in place to ensure safety while these pickers engage in their routine collection activities. There is incident reporting (log) mechanism established which ensure rapid response on any reported incident and helps to keep track and make adjustment to proposed action in eliminating all work environment risk.

The project provided full personal protective equipment (PPEs) to all staff and waste pickers, including gloves, glasses, safety shoes, reflective vests, and overalls. The project recognized that it is necessary to provide regular reminders to staff and waste pickers to always wear PPE correctly and line supervisors were required to monitor and enforce discipline in consistence and proper use of PPE. The project conducted occupational, safety and health training for its waste pickers and employees and during these training courses explanations were given as to the risk factors associated with plastic waste collection and processing, awareness on health and safety best practices (including proper PPE use and maintenance of injury and accident-free working environment, as well as the use of fire and safety devices.

Health and safety warning signages were not seen displayed at appropriate places around the project's work areas. Hence, FAR (2) was raised to verify this during the verification.

A worker health and safety committee has also been instituted that helps to monitor and advise on health and safety programs. In addition to the remuneration in exchange of plastic waste from waste pickers, a loyalty program has been created by MGA which allows them to earn additional benefits (balanced diet meal, food items, better PPEs…). MGA also has a crowdfunded yearly health program called "Support a waste worker" which donates health checks and individual counselling to waste workers directly in a chosen TP (Trading Point) during Health Events. Above 95% of MGA's workers are covered by a health insurance.

Observations made onsite made onsite and documented evidence (Occupational Health & Safety policy, Employee Handbook etc) confirmed that the project has gone through a great deal to safeguard the health and safety of its workers and that adequate measures were taken to address all health and safety concerns, and the project's procedures and measures followed the requirements of the Plastic Standard, v1.0 but there were not health and safety signage in displayed hence, FAR (2) was raised.

2.3.2 Labor

The project identified all relevant labour and human rights laws of the host country and implemented strict measures to ensure compliance with all applicable laws governing the project. The identified laws cross-referenced with the project region's national and international legislation directory covering workers right were confirmed as tabled below:

Table 5. Applicability of Laws & Regulations

Applicable Laws & Regulations Covering Workers Rights
Kenya Employment Act (2007
International Labour Organisation Regulations
Minimum Wages Order (2002)
Regulation of Wages (General) Order 1982
Labour Relations Act (2007
Occupational Safety and Health Act, 2007
Work Injury Benefits Act, 2007

The entities involved in the project have been registered under Kenyan laws and regulations, including issuance of contracts and business registration documents. Laws, regulations, and codes applicable to the Mr. Green Africa & Removall: Plastic waste reduction project in Kenya operational activities.

Staff and workers are the recycling facility are not required to work under conditions that directly impact their health, safety, or religious values and workers under the age of 16 are not involved in the project. Waste pickers and suppliers have their identities checked by reviewing identification cards with display of ages to eliminate the risk of recruiting underage workers. All entities and organizations are given signed contracts and/or agreements with the project activity. Workers onsite confirmed during interview that are orientated upon hiring on their rights and responsibilities. Labors laws and workers' rights were one of the key elements considered by project to prevent any backlash from the Kenyan government. Labor laws

captured in the projects scope which were confirmed to be in line with the labor of laws of Kenya included, registering with the relevant government agencies (such as the Business Registration Service-BRS, KRA-Kenyan Tax Authority, the labor and social protection) with documented evidence confirming alignment with these agencies assessed onsite to ensure compliance.

In compliance with constitutional provisions giving effect to freedom of association and collective bargaining rights, sampled employees during interviews confirmed they have the right to join or form union to defend their rights through industrial action without facing any backlash from their employer.

Sampled employees' contracts reviewed contained the mandatory benefits which employees through interviews confirmed to have been beneficiaries of Payrolls of employees reviewed during the validation captured only applicable deductions as required by law.

The project also identified the need to continually strengthen women's organizations within the sector by identifying and working with existing women's organizations and enterprises to build their organizational, leadership, and business-management skills.

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 already existing collection and recycling business (e.g. that of Kenya Association of Waste Recyclers . Taking into account the diverse backgrounds of the stakeholders involved in the project, both qualitative and quantitative approaches were used to gather relevant information during the assessment process. It was based on three lines of evidence: desk review, interviews, and observation. A sampling process was employed to select locations and actors from the various counties of the project. All project locations were visited. This is because of the assumption of heterogeneities in responses by the suppliers, workers, and stakeholders in different locations and counties. However, the focus was more on highly interested (Kenya Association of Waste Recyclers) and marginalized stakeholders (Local communities, Informal Suppliers, etc). VVB assessed the elimination of income-generating activities resulting from the project activity and for small-scale recyclers, as claimed by the stakeholders in the public comments received. The project does not eliminate any income-generating activities. Verification through interviews with the project proponent and MGA management confirms that there is no expected decrease in employment due to project activities throughout its lifetime. This was verified by reviewing the full-time employee lists of MGAs since its inception, and it was deduced that over the implementation period, employee growth has increased incredibly, which has created enormous job opportunities and employed over 100 workers. A study commissioned by WWF in 2022 referenced by the project and confirmed during the assessment affirmed that out of the 982,580 tonnes of plastic estimated to be generated annually, only 2.2% of the total waste collected per polymer type is being able to be recycled, making available more waste for recycling.

Interviews with the interested stakeholders (Richard Kainika,- Kenya Assocation of Waste Recyclers and John Chweya,- Kenya National Waste Pickers Welfare Association) revealed a significant concern about pricing. The stakeholder (Richard Kainika,- Kenya Assocation of Waste Recyclers) claimed that MGA price rates for plastic waste were high and wanted to understand what makes MGA pricing on plastic waste materials higher. Through interviews with waste pickers and suppliers, it was determined that 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.

Further investigations into MGA operations during the onsite assessment revealed that one of MGA's key objectives is to enhance the living conditions of vulnerable populations, and also, as part of its social impact contribution to the county through the project, it strives to bridge the living wage gap through fair trade and compensation for all its partners thereby instituting loyalty program making It a first trade choice when it comes to plastic waste. MGA seeks to remunerate its partners fairly, which goes a long way in supporting them in the provision of food, shelter, clothing, and security.

The VVB did not interview small-scale informal recyclers on insights into whether their income-generating activities were eliminated or diminished because this association comprises all kinds of unregistered workers engaged in the collection, recovery, and recycling of waste. The industry is typically characterized by small-scale and unregulated recycling activities, providing a source of income for poor and marginalized workers, and no complaints have been received from these groups or through a representative. However, MGA has considered the larger informal recycling ecosystem, including material flows, informal supply chains, and complex trade relations both within and between informal and formal waste management actors.

In view of the evidence collected onsite during the validation process, the project was found to have implemented practices which were compliant with the employment act of the republic of Kenya including but not limited to sections.

- PART VII – PROTECTION OF CHILDREN - Prohibition of employment of children between thirteen years and sixteen years of age.
- PART III – EMPLOYMENT RELATIONSHIP - Oral and written contracts. Contract of service
- PART IV – PROTECTION OF WAGES - Payment, disposal and recovery of wages, allowances, etc. When wages or salaries due, Deduction of wages, Itemised pay statement, Statement of statutory deductions.
- PART V – RIGHTS AND DUTIES IN EMPLOYMENT - Basic minimum conditions of employment, Hours of work, Annual leave, Maternity leave, Sick leave

Labor laws referenced in the project description by the project proponent was confirmed on the country profile of international labor standards in the international labor organization database. Information obtained international labor organization database affirmed that labor laws and workers right identified and stated were accurate and in line with Kenya's applicable laws.

2.3.3 Energy Efficiency and Greenhouse Gas Emissions

The main sources of (GHG) emissions of such collection and recycling projects are the energy consumption of the machinery used in the recycling facility and all transportation involved in the project. While the project does not actively measure energy consumption or (GHG) emissions as at the time of the validation process, MGA has endeavoured in making active efforts to enhance energy efficiency and reduce (GHG) emissions activities.

Report reviewed confirmed that MGA conducted an energy audit in December 2021 as indicated in the project description and was confirmed that based on on the audit results, MGA implemented various energy saving measures such as changing lights to LED, installation of new industrial equipment to optimize the operations and maintenance procedure. All changes have been quantified in terms of estimated GHG emissions reductions. Energy efficiency calculations were witnessed to be done onsite by project partners, confirming the accuracy and parameters used in estimations and calculations of energy generated and consumed. At the recycling facility visited, measures have been adopted to keep the GHG emissions at a bare minimum. Sorting is done manually by the women's group, and electricity for the operational activities on the plastic waste is monitored with consumption receipts kept at the plant, keeping project management informed on a monthly basis how much energy has been consumed by the facility and measures to be taken against that. Machines were observed to be turned off when not in use, and regular maintenance was carried out to ensure the effective working of these machines and to keep the consumption level at a minimum. All equipment at the processing (recycling facility) is

regularly serviced and maintained to ensure that it continues to operate efficiently, and equipment for new processing is chosen with energy-efficiency components as one of the key considerations. Vehicles undergo regular maintenance and servicing in line with the manufacturer's recommendations to ensure that they maintain as high fuel efficiency as possible. Any increase in GHG emissions from the project activities is offset by the reduction in GHG emissions through the avoidance of the burning of plastic waste and the avoidance of using virgin plastic material further down the value chain.

A significant GHG emissions reductions factor ascertained during the onsite visit was optimizing vehicle capacity for material delivery, aiming to improve their efficiency and in doing so, MGA made it a point to crush and bale material to optimize vehicles loadings. MGA has also recently acquired new electrical forklifts to replace the diesel ones, reducing its total GHG emissions which were evident onsite during the facility tour.

The recycled plastic produced displaces the use of virgin plastic, meaning that plastic products are produced with recycled plastic instead of virgin plastic. As GHG emission factors of mechanically recycled plastics are lower than virgin plastics' ones, this results in lower GHG emissions globally. MGA's recycling activity is also in likeness of better management practices as it avoids plastic waste openly burnt or landfilled. Additionally, the plant runs purely on electricity received from the main substation – and around 90% of the Kenyan electricity, used in the project's recycling facilities, is renewable.

Any increase in GHG emissions from the project activities is offset by the reduction in GHG emissions through the avoidance of the burning of plastic waste, and the avoidance of using virgin plastic material further down the value chain. It was concluded that the project's greenhouse gas emissions are monitored by the project, and the provided analogy are appropriate.

2.3.4 Condition of Natural Resources

Air Quality

MGA project practices aim to significantly reduce dangerous gases and other harmful impacts such as micro plastics in waterways, soil, and ecosystem in general. Common pollutants observed to be generated within the facility during the site visits included dust generated from the shredding and grinding activities, for which management have provided workers within this area of work protective clothing to prevent any potential health risks on workers as possible. Also, ventilators have been installed on the roofing of the recycling facility to help get rid of stale air. Around 42% of plastic waste is openly burnt in Kenya. MGA's project collects and recycles plastic waste which helps to reduce the amount of plastic waste openly burnt and therefore improving air quality. MGA has tested the emission of its boiler in a study reviewed onsite which was confirmed through interview to be conducted by an accredited Kenyan laboratory which concluded that the requirements of the air quality (EMC regulation of 2014) were fully met

Water quantity and quality:

MGA's project was confirmed through interviews with suppliers and observations made onsite to collect and recycles plastic waste which helps to reduce the amount of plastic waste in landfills or dumped into the environment, therefore reducing the pollution of chemicals and microplastics from plastic waste into water bodies. In addition, MGA implements a dedicated manufacturing process to ensure effluent water treatment. The input of this process is the chemically polluted water from the recycling facility machineries visited (during the washing process specifically) was observed to go through flocculation, clarifier, and carbon filter to produce treated water to be reused. This extra process allows to reduce the quantity of polluted water therefore improving the quality of water overall. By recycling its own water, MGA lowers the total volume of raw water required for its industrial process.

Soil quality:

The project was confirmed through interviews with suppliers and observed during site visit to collect and recycle plastic waste which helps to reduce the amount of plastic waste in landfills or dumped into the environment, therefore reducing the pollution of chemicals and microplastics from plastic waste into the soil.

Biodiversity and ecosystem health:

MGA's project collects and recycles plastic waste which helps to reduce the amount of plastic waste in landfills or dumped into the environment of which a significant part ends-up in waterbodies as verified through interviews with suppliers at the project locations and observations made, resulting in an overall improvement of the marine ecosystem. In addition, MGA's project activities do not take place in protected areas or impact threatened and endangered species. Moreover, the removal of plastic waste from the environment aids to improve the health of flora and fauna by reducing likelihood of ingestion or absorption of plastic and its derivatives. Observations made onsite during the site visits and interviews with project management team confirmed that progressive approach has been taken by the project in ensuring minimal negative impact on the conditions of natural resources. The observed impact on natural resources were mainly positive.

2.3.5 Additional Impact Certifications

MGA was confirmed via B-Corp website to be first African recycling company to be certified B-Corporation, since 2021. The B-Corporation certification assesses the sustainable, long-term social, environmental and economic impact of MGA's collection, recycling and sales activities. MGA received an overall B Impact Score of 80,9 which is highly above the median score for ordinary businesses of 50,9.

Additionally, MGA has also passed REACH certification tests on its recycled plastics and is under validation for the ISO 5512-1 certification.

2.4 Application of Methodology

2.4.1 Title and Reference

The methodologies applied in the Project Description comprised.

The project applied both PWRM0001 Plastic Waste Collection Methodology v1.1 and PWRM0002 Plastic Waste Recycling Methodology v1.1.

2.4.2 Applicability

The project activity of waste collection and waste recycling have been validated through documents review, observations made onsite, site visit, and interviews as such. From this assessment, a well-grounded deduction was made which affirmed that every step and procedure of the project activity is operated properly and correctly following the Plastic Standard v1.0, and all project activities described are truly the reflection of what is on the ground, and all relevant stakeholder groups joined and were part of this project activity. All project activities are operated as per local regulations, and all stakeholder groups described joined or have been a part of this project activity. Traceability on amount of waste

collected and recycled were assessed from suppliers though to the end (Recycling facility). Onsite visits were used in determining the whole process and payment from waste pickers to suppliers. The table below provides comprehensive description of applicability per the respective criteria.

Table 6. Applicability criteria for Collection methodology

Applicability criteria PWRM0001 v1.1	Justification of the project situation
1. Project activities result in plastic waste collection from the environment through the following activities: (1) Informal collection (2) Formal collection	Mr. Green Africa & Removall: Plastic waste reduction project in Kenya depends on informal sector through waste pickers, aggregators or community-based organizations, who collect from dump sites, public areas, uncontrolled landfills. Collection is also done via structures strategically located in designated areas called trading points. The Project is operated by MGA, and it provided training to these collectors on what types of plastic to collect and how to safely collect it. Checked through interviews with collectors and project partners and review of invoices of waste collected. informal waste collectors deliver their collected waste off at the respective project collection hubs. Based on the above assessment supported a positive conclusion.
2. Collection activity is a new activity or a capacity addition.	Collection activity is new activity. Each collection instance is a new activity carried out for the recycling of plastic waste in MGA recycling plant in Nairobi; this results in significant increases in the collection of plastic waste. This was confirmed from review of inventory files at the respective collection hubs containing data on all volumes from start date of July 1, 2020. The VVB can confirm that the collection activity is a new activity based on the above assessment.
3. The sources of the collected waste are clearly identifiable and are existing or potential sources of plastic waste that would have been left or dumped in the environment (including open burning, dumpsites) or incinerated without energy recovery in the absence of the project activity.	Sources of waste are clearly identifiable and mainly originate from households, dumpsites, public areas, uncontrolled landfills. This was verified through onsite visits made and most project regions do not have a proper solid waste management system. Waste pickers within the project interviewed confirmed to collect plastic waste from informal dumpsites, open land, the environment, and public spaces where there is inadequate waste management. Waste pickers take material to collection sites hubs The material collected by waste pickers would have otherwise been left in the environment, due to a lack of policies and systems in place, as described in the regulatory surplus section confirming through the verification of the study by WWF on “EXTENDED PRODUCER RESPONSIBILITY FOR SINGLE-USE PLASTICS AND PACKAGING WASTE STREAMS: AN ASSESSMENT FOR KENYA” estimating 982,580 tonnes of plastic waste being generated in Kenya annually out of which, 8 percent is collected nationwide; the remainder is left in the environment or burnt. The VVB can conclude that the sources of collected waste are clearly identifiable and traceable.

4 The collected waste is disposed of directly in a landfill or transferred directly (with or without commercial transactions) to a processing/recycling /manufacturing facility or to a chain of intermediary agencies that transfer the material to an appropriate end destination (e.g., identifiable processing/recycling/manufacturing facilities and/or landfills).	The sources of the 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. This includes waste from informal dumpsites, open land, the environment, and public spaces. Traceability assessment on waste volumes (incoming and outgoing), the end destinations through issued receipts and sales receipts/payment invoices) for plastic waste checked ensured project's compliance to the criterion. During the assessment, the entire plastic supply chain was validated from source to end destination was confirmed that all collected plastic waste is transferred to appropriate end destinations. During interviews management team and project partners that the collected waste is pre-sorted at aggregation hubs and then sorted by type, weighed and transferred to the mechanical recycling facility in Nairobi, where it is processed into flakes and/or pellets and sold to plastic manufacturing facilities. Based on the assessment done on the transfer of the collected insufficient volumes to this end destinations, and a cross check on the locations of the end destinations through receipts issued where the collected plastic waste was transferred to, it is concluded that all collected plastic waste is transferred to an appropriate end destination.
5 The dry weight of the final output of collected plastic waste that reaches an appropriate end destination is directly measured and recorded	The dry weight of the final output of collected plastic waste that reaches to MGA recycling factory is directly measured using a calibrated scale and recorded. Evidence such as sales invoices, delivery notes and receipts generated by the project proponent are documented. Documented SOP (including sourcing, sales and manufacturing) are also in place aiding in the monitoring the final product against the sales invoice as evidence of the final output and destination of the plastic waste managed. This was checked during the field visit when collectors delivered their waste and using the invoices. Staff at the respective site visited were interviewed to determine alignment deliveries with available stock, ensuring data correspondence. The VVB can confirm, based on the assessment above, that the dry weight of the final output reaches an appropriate end destination through a documented manner.
6 The output of the collection activity is not used in any unauthorized, illegal, or non-statutory activities within the project boundary.	The output of the collected material goes to the processing sites within each Pod, where it is processed. Processing may include sorting, drying, cleaning, and storing, though for the sake of preventing double-handling of contaminated waste, most sorting, drying, and cleaning occurs at the collection sites. Each collection point has a relevant county permit or is in waste zoning land, fire safety permit which is fenced and secured. It is unlikely that material from this location would

	be removed to be used in any illegal or harmful activities as the facility is managed by MGA staff during operating hours and securely locked up at night. If need be, security personnel are hired but there's been no instances to resort to that. Records of sale of collected plastic (including sales invoices, delivery notes and receipts) generated by the project proponent are maintained for the purposes of the project and recordkeeping and payments invoices recorded and used to verify that the collected waste goes to recycling facility in Nairobi and other appropriate end destinations. The assessment above supported a positive conclusion on this point.
7 The material collected in the project activity is taken to one or more of the end-of-life destinations listed below, referred to as appropriate end destinations throughout this methodology. Compliance of the activities of the end destination facility with relevant local or national regulations shall be demonstrated: (1) reprocessing, (2) mechanical recycling, (3) Incineration with energy recovery, (4) Chemical recycling, (5) Landfill.	The material collected in the project activity is taken to an end of-life facility defined as in the project as a mechanical recycling facility where the collected waste is reprocessed and/ sold directly to plastic manufacturing companies for the appropriate end-of-life destination. No plastic waste is taken to landfill in the collection stage. This was confirmed through performing a traceability assessment (which includes volume reconciliation), tracing whether the volumes that were collected were then also transferred to one of these end destinations (through comparing weigh bridge receipts of received collected plastic and sales/ receipts of the plastic waste that is then transferred to its end destination). The assessment above supported a positive conclusion.
8 There is plastic waste available in the region that would not have been collected in the absence of the project.	The availability of plastic waste was demonstrated by defining the baseline scenario and using the most recent publicly available data on plastic waste. A cross check was performed to confirm the data from the sources cited by the PP. Based on this corroboration of the referenced study and the assessment of the sources, information was confirmed to be reliable and accurate.
9 The project activity does not compete with other collection activities or include plastic waste that has been diverted from a historically existing collection activity.	Plastic waste collection and recycling are negligible in scope due to a lack of formal waste collection services and coordinated government resources. As well as defined in the project eligibility, the plastic waste recovery is below 20%. Therefore, the project activities do not compete with other collection activities. Contrarily, it expands and enhances formal collection in cities and towns with low formal collection and high plastic leakage. This was assessed through interviews of project staff, stakeholders that left comments on the project during the public comment period and literature review of laws and peer reviewed articles. It can therefore be confirmed that the project does not compete.

This methodology is not applicable under the following condition: 10 Project activities include any of the following end-of-life destinations of plastic waste: a) Open burning; b) Dumping on open land; c) Dumping in water bodies and/or dumpsites; or d) Incineration without energy recovery.	Plastic waste collected during the project activities are all taken to the mechanical recycling facility in Nairobi, which is an appropriate end-of-life. This was assessed through volume reconciliation (based on sales and purchase invoices that detail volumes and location) which showed appropriate end destination. Based on this assessment and interviews with stakeholders and observations, the VVB can conclude that the project activities do not include dumping on open land, in water bodies and/or at dumpsites; open burning; or incineration without energy recovery. Plastic waste deemed unapproved/contaminated is either not accepted by the recycling facility or is stored for later disposal by the authorized agency as per the relevant regulations.
This methodology is not applicable under the following condition: 11 There is transboundary movement of collected plastic waste occurs between countries, except in the following circumstance: a) Projects involve collection of plastic waste in a Least Developed Country (LDC) or Small Island Developing State (SIDS) and its export to any country after completing at least one pre-processing requirement (i.e., sorting by material, removal of impurities, shredding and resizing, identification/testing and/or separation), where the waste is taken to an appropriate end destination in the importing country. A robust and transparent chain of custody from the source of plastic waste in the exporting country to the appropriate end destination shall be provided.	Based on the assessment done on the transfer of the collected volumes to appropriate end destinations, and cross referencing on the locations of the end destinations where the collected plastic waste was transferred to, it is concluded that all collected plastic waste is transferred to an appropriate end destination within the project region of Kenya. No transboundary movement of collected plastic waste takes place.

Table 7. Applicability criteria for Recycling Methodology

Applicability Criteria PWRM0002 v1.1	Justification of the project situation
1. Project activities result in mechanically recycled plastic waste through one or more of the following: (a) new facility (b) Capacity addition (c) incentivising and facilitating an increase in collection and/or sorting of plastic to enable an increase in recycling.	During site visits it confirmed that the project involves the installation and operation of a new mechanical recycling facility for collected plastic waste. As the project advances, including the establishment of new trading points, additional recycling machines would be installed at the facility, enabling new recycling opportunities. Claims are to be made on credits for all plastic waste that mechanically recycled at the recycling facility

	sites operated by the MGA and either remanufactured on-site or sold to a local manufacturing company.
2 The plastic waste being recycled is either collected or diverted from: a) The environment. b) Landfill. c) Open burning d) Incineration with energy recovery. e) Households and/or commercial entities. f) Incineration without energy recovery; or g) Any other waste management option that does not allow for a second life of the plastic waste	The plastic waste is collected from the environment: untreated landfills, open dumpsites, public areas, streets, near waterways, beaches. Visits to the collection sites and interviews with suppliers at the recycling facilities confirmed that plastic waste recycled is indeed collected from the above-mentioned sources. Based on the above assessment supported a positive conclusion.
3 Project activities include mechanical and/or chemical recycling as defined in the latest version of the Plastic Program Definitions.	The project adheres to the definition of mechanical recycling. The Project activities include the processing of plastic waste into a secondary raw material via a mechanical process including flaking. MGA mechanically recycles plastic waste producing pellets from the hot-washed flakes obtained during the processing process. Hot washed flakes were observed to be put into the conveyer which moves them to the heating part of the machine where they are melted and come out as pellets. The pellets are then inspected by the quality team onsite to ensure conformity of colour and size. The pelletizing process entails the production of by-products such as machines lumps (which is materials do not properly melt but is eliminated in the sieve) and dust, which are also be sold to specific clients. Based on the above assessment, recycling activities witnessed onsite conforms with mechanical recycling as defined in the latest version of the Plastic Program Definitions.
4 The waste stream is sorted before it enters the recycling process. The project proponent must provide a sorting (pre-recycling) description. The description must include the following: a) Source of the plastic waste; Technologies and methods used to sort the plastic waste; c) Detailed description of the sorting criteria; and d) Expected material composition of output waste streams post-sorting according to material types defined in the latest version of the Plastic Standard.	Plastic waste is collected were confirmed through interviews with sampled waste pickers and project responsible management personnel and observations made onsite to be from the environment, dump sites, public areas, uncontrolled where it was dumped by individuals, households, or businesses, landfills and taken to the collection sites. Collection is also done via structures strategically located in designated areas called trading points. Informal waste collectors are trained to manually separate plastic waste based on the type of plastic prior to bringing their waste to the collection site where it further sorted by staff with documented

	training records made available for review during the site visits. This is incentivized to be done and attracts a higher purchase price at the collection sites compared to unsorted waste. Records reviewed confirmed that MGA provided training to these collectors on what types of plastic to collect and how to safely collect it. Checked through interviews with suppliers and project partners and review of invoices of waste collected. Waste is further sorted manually per type by collection site staff into the different plastic types; HDPE, PP and PET, with any contaminated plastic waste being separated. As part of the sorting process, any contaminated plastic waste is separated from the rest of the plastic waste before weighing occurs. The waste materials delivered by waste pickers is directly measured and recorded in monitoring spreadsheets and corresponding receipts by MGA staff and waste pickers receive payments accordingly. The VVB confirms that only uncontaminated waste is then separately flaked and or pelletised at the recycling facility. Only uncontaminated recycled PET HDPE, PP flakes and or pellets are sold to local recycling companies.
5 Waste materials are not mixed with hazardous materials or substances (e.g., coatings, adhesives, or colourants) that could become unsafe if compressed, combined, or exposed to high temperatures during the recycling process.	The project does not use any additives at any stage in its recycling process as witnessed during the site visit. All Waste pickers under the project are trained in collecting clean and dry plastic, and receive their payments based on the dry weight of plastic delivered. As part of the sorting process, any contaminated plastic waste is separated out from the rest of the plastic waste before weighing occurs. The output of the collected material goes to recycling facility site in Nairobi where it is processed. Processing may include sorting, drying, cleaning, and storing, though for the sake of preventing double-handling of contaminated waste, most sorting, drying, and cleaning witnessed to occur at the collection sites. Activities observed at the recycling were in line with the regulations and certificate affirming project's compliance to all environmental regulations was in place affirming that recycling process activities are carried with all safety precautions maintained.
6 It is possible to directly measure and record the final output of the recycling facility (i.e., the weight of plastics) segregated by material type.	The different types of plastic were observed to be recycled separately in Nairobi, and the final output of the recycling facility is measured and recorded. The plastic, after being recycled into flakes and/or pellets, is placed into bags of different weights for sale to plastic manufacturers. To conclude, the VVB

	confirm through the above assessment that it is not only possible, but the project has implemented measurement and recording of final outputs.
7 The output of the recycling facility is of a sufficient quality such that it can be used to displace the use of virgin plastic. Only the fraction of the output of the recycling process that is or can be used to produce recycled plastics is eligible for WRCs. Credible evidence such as contractual agreements, receipts of sale of recycled material, third party survey results, or chain of custody certification (e.g., ISCC PLUS) must be provided.	HDPE, PET and PP were observed to be mechanically recycled onsite using a flaker which creates a feedstock which can be used in the manufacturing of recycled products, displacing the use of virgin plastic. Feedstocks are materials or substances produced by the recycling of waste, which can be used as resources for the manufacture of new plastics These remanufactured products replace the use of virgin plastic as they are creating products traditionally made from virgin fossil fuel plastic. Receipts, invoice, email communication on orders received from entities confirmed purchased remanufactured materials affirming to the displacement of virgin plastic. The final output from the recycling process is directly recorded and measured as there is no additives in the process. HDPE, PP and PET are then segregated by material type prior to being flaked and palletized which will allow identification of the final product by material type. The quality of the recycled plastic waste allows it to be used as feedstock in the manufacture of recycled products, thereby displacing the use of virgin plastic. MGA has established a customer feedback procedure for permanently assess the quality of the produced recycled products compared to virgin plastic's performances. Receipts are maintained specifically on the sale of recycled plastic to plastic manufacturers. All sales receipts are processed and stored. To conclude, based on the above assessment, the plastic is of sufficient quality and the project's outputs are used by its customers to produce a diverse range of recycled plastic products.
8 There is recyclable plastic waste available in the region that would not have been recycled in the absence of the project.	The availability of plastic waste is demonstrated by defining the baseline scenario and using the most recent publicly available data on plastic waste. Despite limited sources and data available on the subject, the project managed to produce a solid reasoning based on data on the availability of plastic waste in Kenya. Sources used include a study commissioned and completed exclusively for WWF on "EXTENDED PRODUCER RESPONSIBILITY FOR SINGLE-USE PLASTICS AND PACKAGING WASTE STREAMS: AN ASSESSMENT FOR KENYA", confirming an estimated 982,580 tonnes of plastic waste being generated in Kenya annually out of which, 8 percent

	is collected nationwide, and with that just 2.2 percent is properly managed. A reassessment of referenced data was carried out to determine the confirm information from the sources cited by the PP. Based on this corroboration of the referenced and the assessment of the sources, information was deemed reliable. The cross examination and reassessment of the data and sources cited by the project were consistent with observations made during the site visits to the project region. It was therefore concluded that there is plenty of plastic waste available in the region that would not have been collected in the absence of the project.
9 Project activities that include any depolymerization of sorted plastic waste streams must justify why the materials in the sorted plastic waste stream cannot be	There was no depolymerisation of the plastic waste during the recycling process observed during site visits of the various project locations.
10 The project activity does not compete with other recycling activities or include plastic waste that has been diverted from a historically existing, legally recognized recycling activity. Evidence, such as proof of how the plastic waste was managed over the three-year period prior to implementation of the project activity, must be provided.	MGA does not divert plastic waste from any historically existing, legally recognized recycling activity. The recycling activity processes mismanaged plastic waste brought in through the collection activity that was going to be left in the environment in the absence of the project as demonstrated in **Step 3a: Project Method - Penetration Rate of Recycling Activities**. Therefore, the project activities do not compete with other recycling activities. The availability of plastic waste is demonstrated by defining the baseline scenario and using the most recent publicly available data on plastic waste. The VVB concludes that without the project activities, there would be mismanaged plastic waste, which would be at significant risk of entering the ocean, environment etc
11 Plastic waste that enters the project recycling facility but is not recycled or is lost during the recycling process (e.g., due to contamination) is managed in a way that does not include dumping on open land, in water bodies and/or at dumpsites; open burning; or incineration without energy recovery.	It was observed during recycling facility site visit and sales receipts delivery notes, and or invoices reviewed that plastic waste that enters the project recycling facility but is not recycled or is lost during the recycling process (e.g., due to contamination) is managed in a way that does not include dumping on open land, in water bodies and/or at dumpsites; open burning; or incineration without energy recovery. Contaminated plastic waste is either not accepted by the recycling facility or is stored for later disposal by the authorized agency as per the relevant regulations. The VVB confirms that the plastic waste that enters the project recycling facility but not recycled or lost during the recycling process is managed appropriately.
12 The plastic waste to be recycled MUST NOT be collected in and imported from other countries (except if importing from LDC / SIDS).	No plastic waste observed to recycled within project has been collected in or/and imported from other countries. All plastic waste recycled where collected

	within the project region (Kenya), as per delivery notes, receipts, and sales invoice reviewed during the onsite assessment. To conclude, the plastic waste recycled is not collected and imported from other countries.

2.4.3 Project Boundary

Interviews with sampled collectors (including suppliers) during site visit at the collection hubs confirmed that plastic wastes are collected from locations such as:

a) The environment (thus waterways or public land.

b) Uncontrolled landfills

c) Households and/or commercial entities

d) Open dumpsites and streets

The collectors confirmed through interviews that, they sort the plastic collected by material type and color. Sorted plastic waste are then transported by trucks to the recycling facility.

Receipts on plastic waste volume delivered by sampled suppliers reviewed and records at the collection hubs were balanced. cash equivalence on plastic waste delivered by the respective suppliers were also made with payment receipts reviewed confirmed with payment records at the recycling plant.

At the collection hubs, visited, the volume of plastic wastes is aggregated and then transported to the recycling facilities at Nairobi for reprocessing or sold to a local manufacturing company.

At the Nairobi recycling facility, the plastic waste is further sorted out recycled per material types and colours for further manufacturing activities.

Recyclers at recycling facility were observed to segregate plastic waste delivered at the recycling facility per type then to the recycling machinery for further recycling processes.

Project boundary steps assessed on onsite as elaborated with diagram in the Project description reviewed confirmed project compliance with project boundary requirements described in the Plastic Standard v1.0.

Source		Material Type	End-of-life	Explanations
Baseline	Unregulated disposal sites	HDPE	Continues to remain in the dumpsites, sometimes openly burnt and leaks into the environment	Minimal to no collection activities depending on region. Plastic waste is mainly found in the environment. In Kenya, the landfill is an unsanitary landfill. There is a chance of leakage of plastics back into the environment, and the incineration of waste is predominant in landfills, causing air pollution.
		PP		
		PET		

	Environment	HDPE	Continues to remain in the Environment or if cleaned up, is transported to a dumpsite.	
		LDPE		
		PET		
Project	Unregulated disposal sites	HDPE	Recycled into feedstock such as pellets or flakes, etc.	Through mechanical recycling, it is made into flakes and/or pellets, and sold for manufacturing units. The plastics which are collected but not recycled are sent to the landfills
		PP		
		PET		
	Environment	HDPE	Recycled into feedstock such as pellets or flakes, etc	
		PP		
		PET		

2.4.4 Project Region

GPS coordinates were taken during the on-site visits. These coordinates validated were in line with the GPS coordinates provided by the project Proponent, and the project activity instance locations as indicated in the KML file. Interviews with suppliers and workers during the validation assessment confirmed collection and recycling activities occurs in the outlined locations and follow up visits to these sites was carried out by control union Ghana to ensure the locations of the collection activities are as described and not otherwise.

2.4.5 Baseline Scenario

The baseline scenario is that in which, without project implementation, the plastic waste would have remained in the environment, been disposed of by open burning, been incinerated without energy recovery and/or disposed of in a dumpsite.

Collection

The project proponent used feasible and reliable evidence to support the claim that the correct baseline scenario for plastic waste collection activities in the geographic area of Kenya was determined. This was

verified through double checking the supporting documentation that was done as part of the validation process, what was witnessed onsite in the project region when visited the project locations, and additional evidence gathered by the lead assessor (as referenced below) which confirmed the assertions made in the project description reviewed.

" Study was commissioned by and completed exclusively for WWF 2022 estimated 2,692 tonnes of plastic waste per day, or 982,580 tonnes per year is generated in Kenya. The amount of plastic waste that is collected but not taken to designated municipal dumpsites – e.g., is either burnt in the open or is taken to informal dumpsites – can be estimated to be around 240,000 tonnes per year. About 903,974 tonnes of plastic waste annually is mismanaged in Kenya and ends up in the environment in one form or another, based on the amount that is not collected or not properly disposed of"

Without the project activities, most of these volumes of plastic would not be collected and would remain on the streets and in the environment or, if collected, would end up in landfills and dumpsites and burnt without proper control hence Control Union confirms that the baseline scenario from PWRM0001 v1.1 is well defined for this project.

Recycling

Similar to the assessment provided in the baseline for the collection, this was verified through double checking the supporting documents (WWF analysis report from 2022) that was done as part of the validation process, onsite visit of the project region when visited the project locations, and additional evidence gathered by the lead assessor (as referenced below) which confirmed the assertions made in the project description reviewed. Waste is not separated at the source, as there is no separate collection, so many valuable resources, such as LDPE, PP, HDPE, are discarded, dumped in public places, and taken to dumpsites and landfills or incinerated in open spaces. Without the project activities, plastic would not be recycled and would remain in the environment therefore Control Union can confirm that the baseline from PWRM0002 is applicable to this project.

> *"92% of all plastic waste generated can be considered mismanaged per study commissioned by and completed exclusively for WWF 2022. The mismanaged waste fractions are prone to become problematic by finding their way into the environment"*

Waste is not separated at the source, as there is no separate collection, so many valuable resources, such as PE, PP, and HDPE, are discarded, dumped in public places, and taken to dumpsites and landfills or incinerated in open spaces. Without the project activities, plastic would not be recycled and remain in the environment. Control Union concluded that the baseline scenario from PWRM0002 v1.1 is well-defined for the project.

https://wwfke.awsassets.panda.org/downloads/extended_producer_responsibility_report.pdf

https://nicholasinstitute.duke.edu/sites/default/files/projects/Plastic-Pollution-Policy-Country-Profile-Kenya.pdf

2.4.6 Additionality

In demonstration of compliance to the applicable methodology, the project applied the following steps to demonstrate additionality for plastic waste collection activities according to PWRM0001 v1.1 in the project geographic locations of Kenya.

Collection activities (PWRM0001, v1.1):

Step 1: The regulatory surplus

Evaluation through conducting a regulatory review of the Kenyan laws, policies, regulations, and regulatory frameworks (past, present, and in the process) that are and/or maybe applicable to waste management and specifically to a collection of plastic waste. There were no laws, policies, or regulations identified and listed by the PP (project proponent) in section 1.13 of the PD and this data provided by the project was validated as part of the review to ascertain the credibility of the data reported. During this review, no laws and regulations were identified as relevant in the project region waste management, including collection.

Step 2: Activity Method - Positive List

The UN's Committee for Development Policy (CDP), which sits in judgment over which country should or should not be ranked an LDC, has not identified the Republic of Kenya as meeting the criteria for an LDC, it remains on the list of lower middle-income country therefore the project does not meet any criteria under the positive list to be deemed automatically additional. The thresholds for inclusion in the list of LDCs are a population of less than 75 million; per capita gross domestic product (GDP) of less than 900 dollars; Augmented Physical Quality of Life Index (combining health, nutrition, and education) of less than 59; and an economic vulnerability index (EVI) of less than 36 but with an annual average growth of 5.9% between 2010 and 2018. With a GDP of $95 billion, Kenya recently reached lower-middle income status and has successfully established a diverse and dynamic economy.

https://data.worldbank.org/country/kenya?view=chart

https://unctad.org/topic/least-developed-countries/list

https://www.usaid.gov/kenya/economic-growth-and-trade#:~:text=OVERVIEW,a%20diverse%20and%20dynamic%20economy.

Step 3a: Project Method - Penetration Rate of Collection Activities

VVB reviewed the calculations made the by the PP (project proponent) during the onsite assessment and observed formula used for calculations is as described per applicable methodologies and data source authentic. The referenced study commissioned and completed exclusively for WWF on "EXTENDED PRODUCER RESPONSIBILITY FOR SINGLE-USE PLASTICS AND PACKAGING WASTE STREAMS: AN ASSESSMENT FOR KENYA", estimated that 2,692 tonnes of plastic waste per day, or 982,580 tonnes per year is generated in Kenya.

The study further emphasized that within the collected portion, mismanagement is also prevalent, as no landfill in Kenya operates according to sanitary standards; this leaves only the recycled and legally exported fractions out of this equation. Accordingly, 92% of all plastic waste can be considered mismanaged.

The amount of plastic waste that is collected but not taken to designated municipal dumpsites – e.g., is either burnt in the open or is taken to informal dumpsites – can be estimated to be around 240,000 tonnes per year. About 903,974 tonnes of plastic waste annually is mismanaged in Kenya and ends up in the environment in one form or another, based on the amount that is not collected or not properly disposed.

Based on both aforementioned instances, annual plastic waste collection was determined as,

Annual plastic waste collection C = 982,580 – 903,974 = 78,606 tons/year

The project estimated the penetration rate of collection activities in Kenya using the formula:

Penetration Rate = (C/G) x 100

Where C = Annual Plastic waste collection (tonnes/year) and

G = Total Plastic waste generation (Tonnes/year).

Collection penetration rate = (total plastic waste collected (C) / total plastic waste generated (G)) x 100

=78,606/982,974*100

= 8%

The project activity has a penetration rate less than 20 percent; hence the project activity is deemed additional.

https://wwfke.awsassets.panda.org/downloads/extended_producer_responsibility_report.pdf

https://nicholasinstitute.duke.edu/sites/default/files/projects/Plastic-Pollution-Policy-Country-Profile-Kenya.pdf

Recycling activities (PWRM0002, v1.1):

Step 1: The regulatory surplus

In Kenya, there are no laws or regulations that enforce the recycling of the relevant material type(s) or the laws or regulations are not systematically enforced, and non-compliance is widespread in the relevant country. While the National Environment Management Authority sets out several plastic waste collection management regulatory improvements, progress towards the implementation of these actions is limited.

Step 2: Activity Method - Positive List

The UN's Committee for Development Policy (CDP), which sits in judgement over which country should or should not be ranked an LDC, has not identified the Republic of Kenya as meeting the criteria for LDC, it remains on the list of lower middle-income country therefore the project does not meet any criteria under the positive list to be deemed automatically additional.

Step 3a: Project Method - Penetration Rate of Recycling Activities

An Independent market survey was conducted by an expert (Domitille Guilloton), an Individual Consultant Company registered under SIRET 88271036100032, to estimate the maximum installed plastic recycling capacity for PET, HDPE, and PP in Kenya.

The installed recycling capacities for PET, PP, and HDPE remain largely insufficient across Kenya. Mr. Green Africa stands out as one of the few actors with the capacity to address plastic pollution on a national scale. With plastic production expected to grow exponentially in the coming years, scaling up and supporting such initiatives has become more critical than ever.

Given the limited availability of reliable data, the study combines an extensive literature review with local data collection methods—including word-of-mouth inquiries and targeted call sessions—to produce the most accurate estimates possible. The survey was conducted over two months, during February and March 2025.

First, a comprehensive literature review was conducted, drawing from official sources such as government publications, reports from local authorities, and documents released by reputable organizations like UN-Habitat and WWF. Industry-specific resources, including information available on the websites and social media platforms of recycling companies, complemented this.

Second, local survey methods were employed by leveraging existing networks to collect insights through word-of-mouth, informal conversations, and call sessions. Due to the informal and often confidential nature of this type of information, obtaining precise figures proved challenging. In cases where uncertainty remained, the survey retained the maximum reported recycling capacity to ensure a conservative and inclusive estimate.

Given Kenya's economic growth in recent years, combined with the limited enforcement of plastic reduction legislation, these figures are likely to have increased significantly over the past three years. However, to ensure a conservative and consistent baseline for analysis, the 2022 data was retained for all calculations in the study.

Based on the findings from both the literature review and local surveys, a comprehensive list of large-scale plastic recycling facilities operating in Kenya has been compiled, along with their primary areas of focus and location.

TakaTaka Solutions has already been validated under Verra's Plastic Waste Reduction Program. As per Verra's Plastic Waste Reduction Standard Guidance, its total recycling capacity has therefore been excluded from the calculation of the penetration rate. Mr. Green Africa was also excluded from the calculation, as the project activity is undergoing Validation with the Plastic Waste Reduction Program at the time of the study. Several other plastic recycling companies were identified but were excluded from the scope of this study. These companies were not included either because they do not engage in the mechanical recycling of the plastic types relevant to the analysis — namely PET, HDPE, and PP — or because they operate on a very small scale, with recycling capacities below 100 tonnes per annum. In some cases, they were excluded due to a lack of available information, as neither the literature review nor local call sessions yielded sufficient data. The detailed list of excluded companies was included in the study results which were verified by the VVB corroborating reasons for exclusion.

The project estimated the penetration rate of collection activities in Kenya according to the formula:

Penetration Rate = (C/G) x 100

Where ***C*** is the annual total installed recycling capacity of all legally recognised recycling facilities in the region, in tonnes per year, and ***G*** is the annual plastic waste generation for the region in tonnes per year.
The Penetration Rate for all plastic types combined is determined as:

$$Penetration\ Rate = \frac{Annual\ total\ installed\ recycling\ capacity\ C}{Annual\ plastic\ waste\ generation\ G} * 100$$

Plastic recycling capacity - 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. With the assumption that recycling operations are functioning at full capacity. As the data is not readily available, independent market studies were carried out by interviewing industrial experts to estimate as precisely as possible the generation and recycling capacity of plastic waste for the material types focused on by MGA. In cases where recycling capacity was expressed as a range, the maximum value was selected to adopt the most conservative approach. The independent survey results for each plastic type managed by the project.

The survey's referenced data dates to 2022. a WWF study led in 2022. The numbers used for calculation:

	PET (MT)	HDPE (MT)	PP (MT)
Maximum installed recycling capacity	**12 450**	**4 750**	**7 275**
Amount of waste generated *(2022)*	85 781	101 377	212 502
Recycling capacity rate	14,51%	4,69%	3,42%

Category	Amount generated (tpa)
PET	85 781
HDPE	101 377
PP	212 502

$$Penetration\ Rate\ (PET) = \frac{12{,}450}{85{,}781} = 14.51\ \%$$

$$Penetration\ Rate\ (HDPE) = \frac{4{,}750}{101{,}377} = 4.69\ \%$$

$$Penetration\ Rate\ (PP) = \frac{7{,}275}{212{,}502} = 3.42\ \%$$

The Recycling Penetration Rate of Kenya is below 20% for each plastic types managed by the project. The project is therefore additional.

The independent market study concluded that even under the most conservative scenario — considering the maximum installed capacities estimates and excluding the fact that plastic waste generation has significantly increased over the past three years — the nationwide recycling capacity for PET, HDPE, and PP remains below 20%. This highlights a significant shortfall in Kenya's installed recycling infrastructure for these key plastic types. Mr. Green Africa stands out as one of the few actors with the capacity to address plastic pollution on a national scale. The independent market survey can be assessed using *https://mgaindependentmarketsurvey.tiiny.site/*

Based on the findings of the assessment of the additionality, VVB concluded that

1. The project correctly followed procedure for demonstrating additionality as described in Plastic Waste Reduction Standard v1.0 and also in compliance with additionality requirements of the applied methodologies - Plastic Waste Collection Methodology (PWRM0001 v1.1) and the Plastic Waste Recycling Methodology (PWRM0002 v1.1) of the project collection and recycling activities.
2. Additionality is adequately demonstrated for plastic waste collection and recycling activities in both activities covered under the project.

2.4.7 Estimated Collected and/or Recycled Plastic Waste

MGA project adopted some methods in assessing the quantification of the (estimated) baseline, project and net collected and recycled plastic waste which was evaluated to determine whether steps/methods deployed followed reference documents used. Analysis carried out comprised of.

1. The quantification of the (estimated) baseline, project and net collected and recycled plastic waste as described in the Project Description and Monitoring Report were assessed for conformance with the calculation methods as prescribed in PWRM0001 v1.1 and PWRM0002 v1.1. It was checked to determine if the correct parameters and equations were applied.
2. The data sources for calculating the baseline collected and recycled plastic waste volumes were reviewed, and recalculation of the collected and recycled plastic waste volumes was performed to ensure accuracy.
3. Traceability assessment was carried out, tracing data from the source (i.e., Waybills, invoices, commercial files etc) to the values of the monitored parameters as reported in the project description report and retracing the values of the monitored parameters as reported back to the source of the data, to ensure accuracy of data representation.

4. Recalculation was performed to confirm the reported volumes of (estimated) baseline, project and net collected and recycled plastic waste.

5. Estimate analysis was performed on sample of the reported data to confirm that the projected volume to be collected and recycled by project were feasible and within a reasonable range, based on the monitored data of project collected and recycled plastic waste at the time of the joint validation and verification.

Based on this assessment carried out, it is concluded that:

a) the (estimated) baseline, project and net collected and recycled plastic waste volumes are quantified in accordance with the parameters and calculation methods provided in respectively PWRM0001 v1.1 and PWRM0002 v1.1

b) the reported volumes of (estimated) baseline, project and net collected and recycled plastic waste are accurate, and

c) the estimated volumes of project collected and recycled plastic waste were feasible and within r reasonable range.

The estimated baseline, project and net collected and recycled plastic waste volumes are described in the MGA project description deport as shown in the tables below, both the project total for each project activity, and broken down on material type totals per project activity. For the sake of keeping this section succinct, please refer to section 4.3 of the project description report for the exact estimated volumes for each material type per project activity instance.

Table 9. Annual net collected quantities (rigid plastics only), collection Instance 1 – Nairobi (start date: 01/07/2020, end date: 30/06/2027)

Year	Estimated baseline collected plastic waste (tons)	Estimated project collected plastic waste	Estimated Net Collected Plastic Waste (tons)
2020	0	570	570
2021	0	2586	2586
2022	0	3622	3622
2023	0	3546	3546
2024	0	5900	5900
2025	0	8429	8429
2026	0	12643	12643
2027 (until June 30th)	0	6322	6322
Total	**0**	**43618**	**43618**

Table 10. Annual net collected quantities (rigid plastics only), collection Instance 2 – Eldoret (start date: 01/07/2020, end date: 30/06/2027)

Year	Estimated baseline collected plastic waste (tons)	Estimated project collected plastic waste	Estimated Net Collected Plastic Waste (tons)
2020	0	0	0
2021	0	96	96
2022	0	360	360
2023	0	395	395
2024	0	657	657
2025	0	938	938
2026	0	1407	1407
2027 (until June 30th)	0	704	704
Total	**0**	**4556**	**4556**

Table 11. Annual net collected quantities (rigid plastics only), collection Instance 3 – Bamburi (start date: 01/07/2020, end date: 30/06/2027)

Year	Estimated baseline collected plastic waste (tons)	Estimated project collected plastic waste	Estimated Net Collected Plastic Waste (tons)
2020	0	0	0
2021	0	0	0
2022	0	1	1
2023	0	216	216
2024	0	360	360
2025	0	514	514
2026	0	771	771

2027 (until June 30th)	0	386	386
Total	**0**	**2248**	**2248**

Table 12. Annual net collected quantities (rigid plastics only), collection Instance 4 – Bombolulu (start date: 01/07/2020, end date: 30/06/2027)

Year	Estimated baseline collected plastic waste (tons)	Estimated project collected plastic waste	Estimated Net Collected Plastic Waste (tons)
2020	0	0	0
2021	0	0	0
2022	0	0	0
2023	0	589	589
2024	0	980	980
2025	0	1401	1401
2026	0	2101	2101
2027 (until June 30th)	0	1050	1050
Total	**0**	**6122**	**6122**

Table 13. Annual net collected quantities (rigid plastics only), collection Instance 5 – Malindi (start date: 01/07/2020, end date: 30/06/2027)

Year	Estimated baseline collected plastic waste (tons)	Estimated project collected plastic waste	Estimated Net Collected Plastic Waste (tons)
2020	0	0	0
2021	0	0	0
2022	0	0	0
2023	0	302	302

2024	0	503	503
2025	0	718	718
2026	0	1077	1077
2027 (until June 30th)	0	539	539
Total	**0**	**3139**	**3139**

Table 14. Annual net collected quantities (rigid plastics only) – Total (start date: 01/07/2020, end date: 30/06/2027)

Year	Estimated baseline collected plastic waste (tons)	Estimated project collected plastic waste	Estimated Net Collected Plastic Waste (tons)
2020	0	570	570
2021	0	2682	2682
2022	0	3983	3983
2023	0	5049	5049
2024	0	8400	8400
2025	0	12000	12000
2026	0	18000	18000
2027 (until June 30th)	0	9000	9000
Total	**0**	**59684**	**59684**

Table 15. Annual net recycled quantities, recycling Instance 1 – Nairobi (start date: 01/07/2020, end date: 30/06/2027

Year	Estimated baseline recycled	PET recycled (tons)	HDPE recycled (tons)	PP recycled (tons)	Estimated net recycled plastic waste (tonnes)

	plastic waste (tons)				
2020	0	0	230	230	460
2021	0	0	929	929	1858
2022	0	60	1150	1150	2360
2023	0	418	1496	1496	3410
2024	0	858	3071	3071	7000
2025	0	1226	4387	4387	10000
2026	0	1839	6581	6581	15000
2027 (until June 30th)	0	919	3290	3290	7500
Total	**0**	**5320**	**21134**	**21134**	**47588**

2.4.8 Methodology Deviations

No deviations in methodologies applied to the project.

2.4.9 Data and Parameters Available at Validation

The data and parameters were checked during the project validation process which were deemed appropriate with the requirements of Plastic Waste Collection Methodology v1.1 and Plastic Waste Recycling Methodology v1.1. All data and parameters were accurately represented in the MGA project.

Table 16. Plastic waste collection

Data / Parameter	$B_{collected,d,y}$
Unit	Tonnes per year
Description	Amount of plastic waste collected in the baseline and transferred to destination *d* in year *y*
Equation	Equation 2 Section 8.1 of PWRM0001 (version 1.1)
Value	0
Source of data	Calculated from historical plastic waste collection data provided by MGA
Justification of choice of data or description of measurement methods and procedures applied	Baseline plastic waste collection is zero for new project activities

Purpose	Determination of baseline plastic waste collection for new activities
VVB assessment	Project proponent has correctly applied and implemented this baseline collection parameter

Table 17. Plastic waste recycling

Data / Parameter	*Brecycled,i,y*
Unit	Tonnes per year
Description	Amount of material type *i* recycled in the baseline in year *y*
Equation	Equation 2 Section 8.1 PWRM0002 (version 1.1)
Value	0
Source of data	Calculated from historical plastic waste collection data provided by MGA
Justification of choice of data or description of measurement methods and procedures applied	Baseline plastic waste collection is zero for new project activities
Purpose	Determination of baseline plastic waste collection for new activities
VVB assessment	Project proponent has correctly applied and implemented this baseline collection parameter

2.4.10 Data and Parameters Monitored

The data and parameters were checked during the project validation process which were deemed appropriate with the requirements of Plastic Waste Collection Methodology v1.1 and Plastic Waste Recycling Methodology v1.1. All data and parameters were accurately represented in the project description report of the MGA project.

Table 18. Project collection parameter monitored

Data / Parameter	$Pcollected,d,y$
Unit	Tonnes per year
Description	Amount of plastic waste collected by the project and transferred to destination *d* in year *y*

Equation	PWRM0001, version 1.1.: Equation 3
Source of data	Measurement on a dry basis at Collection Centres and Aggregation hubs as output of the sorting activity.
Description of measurement methods and procedures applied	Measurement of collected plastic waste is carried out using weighing machines, and the data is documented in the MGA ERP system
Frequency of monitoring/recording	Recorded every time collected material is recovered.
Quality Assurance/Quality Control (QA/QC) procedures to be applied	Hanging scales are regularly calibrated, mandatory QC training and test before starting to work for the responsible of data collection. Strict compliance with MGA's QC policies (e.g., pre-sorting policy…)
Purpose	Calculation of project collected and/or recycled plastic waste
VVB assessment	The project proponent has correctly applied and implemented the parameter as indicated in PWRM0001 v1.1, and has implemented measures and procedures in place to ensure the correct monitoring of the project plastic waste collection parameter for all instances.

Table 19. Sorting output parameter monitored

Data / Parameter	Sorting output
Unit	Tonnes per year
Description	Quantity of sorted plastic waste of each material type *i* in year *y*
Equation	PWRM0001, version 1.1.: Equation 3
Source of data	Measurement on a dry basis at Collection Centres and Aggregation hubs as output of the sorting activity
Description of measurement methods and procedures applied	Measurement of sorted plastic waste is carried out using weighing machines, and the data is documented in the MGA ERP system.
Frequency of monitoring/recording	Recorded every time collected material is recovered
Quality Assurance/Quality Control (QA/QC) procedures to be applied	Hanging scales are regularly calibrated, mandatory QC training and test before starting to work for the responsible of data collection. Strict compliance with MGA's QC policies (e.g., pre-sorting policy…)
Purpose	Hanging scales are regularly calibrated, mandatory QC training and test before starting to work for the responsible of data collection. Strict compliance with MGA's QC policies (e.g., pre-sorting policy…)

VVB assessment	The project proponent has correctly applied and implemented the parameter as described in PWRM0002 v1.1, and implemented measures and procedures in place to ensure the correct monitoring of the project plastic waste recycling parameter for all instances.

Table 20. Recycling input parameter monitored

Data / Parameter	Recycling input
Unit	Tonnes per year
Description	List of input materials (e.g., solvents, process fuels) to the recycling process. This includes the category of plastic waste of material type i and any other material(s) used in the recycling process in year y
Equation	-
Source of data	On-site records
Description of measurement methods and procedures applied	Measurement of sorted plastic waste is carried out using weighing machines before sending as a recycling input, and the data is documented in the MGA ERP system.
Frequency of monitoring/recording	Recorded prior to each batch of sorted plastic waste entering the recycling process
Quality Assurance/Quality Control (QA/QC) procedures to be applied	Proponent uses hanging scales and weighbridges that are regularly calibrated based on manufacturer's specifications and/or every three years. QC is performed before data collection as per proponent's policies.
Purpose	Monitoring for compliance with Applicability Condition 5 in Section 4 of PWRP0002, v1.1
VVB assessment	The project proponent has correctly applied and implemented the parameter as indicated in PWRM0002 v1.1, and instituted measures and procedures in place to ensure the correct monitoring of the project plastic waste recycling parameter for all instances.

Table 21. Project recycling parameter monitored

Data / Parameter	Precycl$ed_{,d,}$y
Unit	Tonnes per year
Description	Amount of plastic recycled by the project activity and transferred to destination d in year y.
Equation	PWRM0002, version 1.1.: Equation 3 As the project does not include polymerisation that is not included in the equation.
Source of data	Direct measurement at project facility using weighing scales.

Description of measurement methods and procedures applied	Measurement of each material type i with weighing scale after the final stage at the recycling facility, before leaving the project site.
Frequency of monitoring/recording	Recorded at each batch of recycled plastic waste after recycling and prior to leaving the recycling facility.
Quality Assurance/Quality Control (QA/QC) procedures to be applied	Continuous inspection is operated on flakes and pellets that are produced. Production of by-products is recorded to calculate Processing Loss rates
Purpose	Calculation of project recycled plastic waste
VVB assessment	The project proponent has correctly applied and implemented the parameter as described in PWRM0002 v1.1, and implemented measures and procedures in place to ensure the correct monitoring of the project plastic waste recycling parameter for all instances.

Table 22. End destination of non-plastic waste from recycling facility parameter monitored

Data / Parameter	End destination of non-plastic waste from recycling facility
Unit	-
Description	End destination of waste (other than non-recycled plastic) produced by the recycling activities of the facility. This includes any waste segregated at the sorting stage within the recycling facility that is not used as an input to the recycling activity and any waste coming out of the recycling process.
Equation	-
Source of data	Third-party evidence such as sales receipts and contractual agreements as well as data extracted from MGA's ERP system.
Description of measurement methods and procedures applied	-
Frequency of monitoring/recording	Recorded at each batch of recycled plastic waste after recycling.
Quality Assurance/Quality Control (QA/QC) procedures to be applied	-
Purpose	Monitoring for compliance with Applicability Condition 11 in Section 4
VVB assessment	The project proponent has applied correctly and monitored project activities to ensure compliance with applicability condition 11 of PWRM0002 v1.1

2.4.11 Monitoring Plan

Documented monitoring framework has been designed to ensure project's tracking processes are in line with the requirements of Section 9.3 of PWRM0001 v1.1 and Section 9.3 of PWRM0002 v1.1.

In accordance with the methods, all parameters listed in each method was monitored for the duration of the project. Data collection and monitoring procedures are followed to manage data and information throughout the project operations and to establish continuous flow of materials and chain of custody, whilst ensuring full traceability across the project's value chain. Detailed SOPs for Sourcing, manufacturing and sales are meticulously followed by all stakeholders involved in MGA's processes

The QA/QC process entails verifying collection and recycling volumes against various forms of evidence, such as sales invoices, landfill receipts, production logs, and the recycling machines' production capacities. If inconsistencies are identified during the reconciliation of volumes, the most conservative values are utilized in the calculations. This QA process is documented using a checklist, which can be reviewed during site visits. The monitoring plan has been thoroughly developed with input from team members with diverse expertise and will be regularly reviewed and updated as necessary to ensure compliance with the methods specified in the Plastic Standard v1.0. At each collection site, a designated official oversees operations related to acquiring plastic waste from suppliers. This official conducts an initial quality assessment of the delivered materials to confirm they meet established standards, utilizing a sorting table for this task. The total weight of acceptable materials is recorded in the presence of the supplier using a precision scale. Transactions for the collected plastic occur on-site, with immediate payment to the supplier, along with any applicable reward points as part of the organization's incentive program. All personnel must complete and pass quality control training before commencing their duties to ensure consistent operational standards. The processes for converting plastic waste into flakes and pellets are meticulously planned and monitored, with trained staff sorting materials by type and color. Continuous quality inspections are conducted on the output, and weights are recorded to evaluate process efficiency and identify any losses. Chemical handling, particularly during washing, is carefully managed to ensure environmental compliance, especially concerning the treatment of contaminated water. Maintenance of the machinery is essential and is performed by a specialized team to ensure regular cleaning and lubrication, preventing breakdowns and enhancing overall operational efficiency. Evidence reviewed confirmed that the actions detailed in the monitoring plan correspond with onsite findings and adhere to the applicable methodologies. The VVB confirmed onsite that the project proponent's QA/QC supply chains are adequate however monitoring systems to track compliance throughout the lifetime of the project with project partners were lacking. Hence why FAR (1) was raised requiring a more improved mechanism to ensure conformance.

3 VALIDATION CONCLUSION

VVB assessment by Control Union on validation of the project activities as implemented under Mr. Green Africa & Removall: Plastic waste reduction project in Kenya (operated by project proponent MGA) in Kenya, East Africa, specifically within the Central, Central - Nairobi, Coastal – Mombasa & Malinda and Eldoret - Rift Valley provinces respectively. Validation was conducted for the crediting period (The Project Crediting Period is 7 years from 01 of July 2020 to 30 of June 2027 (twice renewable)).

The review of the project documents including the plastic project description and additional documentation combined with the interviews carried out with stakeholders, has provided Control Union with adequate evidence to determine that the requirements as described in the Plastic Waste Reduction Standard (v1.0), Plastic Waste Collection Methodology (PWRM0001, v1.1) and Plastic Waste Recycling Methodology (PWRM0002, v1.1) are met.

The documents provided by Removall & MGA related to the validation of the project have resulted in the following conclusions drawn:

- The project complies with the criteria set out in the Plastic Standard v1.0.
- The project complies with the criteria set out in the Plastic Waste Collection Methodology (PWRM0001, v1.1)
- The project complies with the criteria set out in the Plastic Waste Recycling Methodology (PWRM0002, v1.1)
- Baseline is correctly defined and estimated in line with the advised tools.
- Additionality is successfully demonstrated.
- Data and estimates of the collected and recycled waste are of reasonable nature.
- A reasonable level of assurance was reached with physical site visits to assess most of important activities and facilities operations.
- The monitoring plan of waste collection is in line with the Plastic Waste Collection Methodology (PWRM0001, v1.1).
- The monitoring plan of waste recycling is in line with the Plastic Waste Recycling Methodology (PWRM0002, v1.1).

Control Union was the sole responsible entity for the independent validation conclusion related to the project's compliance with the Plastic Standard v1.0 and the applied methodologies. Based on the conclusions outlined above, it is Control Union's opinion, that the project activities were as described in the Project Description and in line with the applicable criteria as spelt out in the Plastic Waste Reduction Standard v1.0, Plastic Waste Collection Methodology (PWRM0001, v1.1) and the Plastic Waste Recycling Methodology (PWRM0002, v1.1).

The plastic waste collected and recycled was measured directly from the suppliers at the collection hubs and at the recycling facility. The measurements and database of partners are also checked in regular intervals during monitoring activities by MGA staff. It was gathered through interviews with project team and sampled employees during site visits those sales receipts are issued per plastic waste delivered at the collection hubs before recycling activities takes place. To confirm volume of plastic waste collected and recorded in the databases at the recycling facility were collected within the project scope, sampled sales receipts, record books from the collection points by the project during the site visits were collated and reviewed by the VVB which were traced to the recycling facility. Therefore, it was confirmed that each supplier's data has been captured in the database of the recycling facility visited with each delivery (including volume delivered and dates of delivery) made at the facility affirming the information captured on the receipts and record books collected during the site visit. List of suppliers with corresponding volumes delivered have been captured in this database. Apart from the receipts and record books, this

was also confirmed through corroborating the information with individual suppliers during interviews. The actual sites of waste collection were done in person by the VVB and observations made painted a vivid picture of where wastes were being collected. The projects activities were also confirmed by the suppliers and staff interviewed during the site visits and this was supported by the consistency of reporting across the different databases and receipts issued to the suppliers. In addition, the weighing scales used are regularly calibrated to ensure accurate measurement of the collected waste with evidence of calibration available and reviewed. In conclusion the evidence (receipts copies, payments voucher, record book etc) reviewed on site in support of the waste collected and recycled is found to be reliable and can be confirmed by the VVB that the project collected and recycled waste reflected the reality on the ground and has the potential to realize the estimated collected and/or recycled plastic waste.

The validation was based on the methodologies for waste collection and recycling (PWRM0001 and PWRM0002, versions 1.1) which is outlined in the Project Description. Responsibility for the collection, calculation, storage and reporting of plastic waste collection and recycling data lies with the project proponent and is conducted as outlined in their monitoring plan. This was checked based on a risk-based methodology where calculations and evidence were assessed using sampling techniques to corroborate information captured in databases containing waste volumes, and interviews with the main project partners and stakeholders. In addition, a document review was also carried out remotely and partly onsite. Control Union was responsible for an independent validation conclusion on the reported plastic waste that is collected and/recycled. A review was conducted of the monitoring plan to determine the risks and their mitigation strategies to ensure an accurate calculation of the collected and recycled waste. Based on the information collected and reviewed, Control Union has reached a validation conclusion at a reasonable level of assurance that Volumes of plastic collected and recycled were calculated in line with the corresponding methodologies PWRM0001 v1.1 and PWRM0002 v1.1.

Lead Verifier: Davidson Boahene

Signature: 

Date: 28-05-2024

Independent Verifier: Evaline Okumu

Signature: 

Date: 28-05-2024

Accreditation Holder: Julia Stefanovic

Signature:



Date: 30-05-2024

4 APPENDIX A: SUPPORTING DOCUMENTS

#	Document
1	Project description of Mr. Green Africa & Removall: Plastic waste reduction project in Kenya
2	Company registration Environment Mr. Green Africa
3	Certificate of incorporation Removall SAS
4	MOU of local project partners: -MGA - Project Agreement - NGO
5	Employment contracts
6	GPS coordinate files (KML, to be opened in Google Earth)
7	Mr. Green Africa (MGA) data collection process
8	MGA Code of Conduct
9	MGA Group BV development ownership confirmation over Mr. Green Africa & Removall: Plastic waste reduction project in Kenya
10	MGA grievance procedure
11	Health and safety assessments conducted
12	Mr. Green Africa & Removall: Plastic waste reduction project in Kenya stakeholder Management Procedure
13	Stakeholders meeting minutes
14	Evidence of consent from county offices allowing MGA Project activities at project locations
15	Bamburi, Bombolulu, Eldoret, Malindi & Nairobi documents : - Monitoring Report and database

	- Plastic waste collection and recycling registry - List of suppliers and volume deliveries - Sales invoices, delivery volumes and volumes per municipality. - Business license & registration - Documents related to social and environmental regulations - Payment receipts

5 APPENDIX B: REFERENCE DOCUMENTS

#	Document
1	Plastic Waste Reduction Standard, v1.0
2	Plastic Program Guide, v1.0
3	PWRM0001 Plastic Waste Collection Methodology, v1.1
4	PWRM0002 Plastic Waste Recycling Methodology, v1.1
5	Plastic Project Validation Reporting Template, v1.0

6 APPENDIX C: FINDINGS

CAR/ CL/FAR + #	Finding	Response by project proponent
CAR #01	Stakeholder identification Describe the locally appropriate methods used in the identification of all stakeholder groups who could potentially be affected by the project to ensure compliance with 3.13.1 of the Plastic Standard v1.0	Thanks to its strong on-ground presence, MGA has put in place locally appropriate methods to identify all stakeholder groups. MGA has established a holistic stakeholder engagement procedure, that allows for stakeholder identification, engagement and reporting.

		The most common identification process is by word-of-mouth, through well-established relationships with key local partners. More specifically, MGA pays particular attention to informal waste workers and was able to identify them thanks to its partnerships with local community groups and NGOs. More formal stakeholder groups are contacted by email, WhatsApp and calls, or met during business events. Justifying document: - MGA Stakeholder Engagement Tracker 2024
CAR #02	Insufficient information and inadequate assessment of stakeholder 1. Section 2.1.8 of the project description 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. Documentations confirming consultation processes in 3.13.7 of the Plastic Standard v1.0 with stakeholders in the project description and addressing whether and how the project design and implementation has been revised based on such input.	The consultation process has been tailored to each stakeholder group with communication channels by call, email, whatsapp or word-of-mouth, as described in the Stakeholders Attending Plastic credit meeting Excel file. The Feedback and Grievance Redress procedure is explained in the Local Stakeholder Consultation support. The support has been presented during the meeting and shared to all the stakeholders afterwards, with Yunia Bidali and Côme Falque identified as the main points of contact. The support has recently been shared again with the department leaders to train teams. A one-pager has also been translated into Swahili (local language), printed and shared to the stakeholders, resuming the main information from the Local Stakeholder Consultation and the main contacts for the Feedback and Grievance Redress procedure. A printed copy of both the Local Stakeholders Consultation support and of the one-pager are now available at each instance. MGA has also engaged with the external hotline service SPEAKOUT since 2022 for providing an independent feedback and grievance redress procedure to its stakeholders. About the plastic credit certification process, MGA has introduced regular briefing of casuals during Toolbox meetings (daily meetings before every shift). Justifying documents:

		- LSC presentation (previously shared) - LSC MGA Removall - one pager - Speak out hotline service - MGA Stakeholder Engagement Tracker 2024 - 2023_GIF_MGA indicators reporting Section 2.1.8 updated. Mentioned: - During the Local Stakeholder Consultation and in its presentation support - During regular meetings, as part of the Stakeholder engagement procedure - in the one-pager on the plastic credit project Printed versions of the one-pager and the Local Stakeholder Consultation support are available at each collection and recycling instance.
CAR #03	Local language that is widely used in the region of the project activities, it is context appropriate for the project to make available a summary of each project description and/or monitoring report available in this language, as to improve accessibility of project documentation for those stakeholders that have little to no understanding of the English language	All the information has been translated in local language - even though almost all the stakeholders are english-speaking - and almost all MGA employees speak both local language and english, which facilitates the communication. A translated version of the Local Stakeholder Consultation support and a one-pager summary have been shared to the stakeholders. Justifying documents: - LSC presentation (previously shared) - LSC MGA Removall - one pager Section 2.1.9 updated: - Printed and translated version of the Local Stakeholder Consultation support and of the one-pager are available at each collection and recycling instances. - PD is currently being translated (even though most stakeholders are English-speaking)
CAR #04	PP is requested to revise section 2.1.5 to describe the project's plan for continued consultation and adaptive management, and address the following:	' MGA's internal processes for Stakeholder Engagement, together with indicators reporting, allow to follow and track stakeholder's input on an ongoing basis and adapt management accordingly.

	- Section does not "Explain the processes the project proponent will use throughout the life of the project to solicit and consider stakeholder input on an ongoing basis and adapt management accordingly" (Instructions from section 2.1.5 of the Joint Plastic Project Description and Monitoring Report Template) - Section does not include "measures to enable the meaningful influence of all stakeholder groups that want and need to be involved in project design, implementation, monitoring and assessment throughout the project lifetime" (Requirement 3.13.9 of the Plastic Standard)	The Speak-Out hotline service has also been established for allowing the collection of such inputs. Tea Parties are organized at every trading point once a week. During those Tea Parties, feedback are shared from the waste pickers to MGA Sourcing Coordinator. Generally-speaking, the certification communication plan allows for stakeholder groups to provide feedback and express their degree of involvement in the project. During the Local Stakeholder Consultation, a time was dedicated to stakeholders for questions and feedback (slide 22). All questions and their answers can be found in the meeting minute Each milestone of the certification process is also communicated to all stakeholders through the various communication channels. Finally, as mentioned in the Local Stakeholder Consultation support, similar stakeholder consultations will be held on a regular basis. Section 2.1.5 updated: - Consultation process tailored to each stakeholder group - Quarterly meetings for all stakeholder groups, and leveraging existing meetings to talk about the project - Influencing project design thanks to the key role of MGA Sourcing Coordinator and the Feedback & Grievance Redress Procedure. Since the beginning of the project, MGA engage stakeholders for establishing project design together with them, in a constructive and collaborative approach
CAR #05	Stakeholders are to receive timely information about the validation/verification body's site visit before a site visit occurs and it's the project proponent's responsibility in facilitating direct and independent communication between stakeholders or their representatives and the assessor however, Section 2.1.10 of the project description does not include how far in advance of the site visits the project	Each site manager has been informed previous to the validation site visit - and the site managers have then informed their employees. In addition, MGA has made representants of various stakeholder groups available for the assessor to meet them. Previous to that, the project proponents had already informed the stakeholders about the validation process during the Local Stakeholder Consultation meeting.

	proponent informs the stakeholders about the validation process.	Justifying documents: - Audit field visit - notice emails - LSC presentation (previously shared) Section 2.1.10 updated: - Site managers verbally informed as soon as MGA gets confirmation from the auditor (at least two weeks in advance) - Official email notice sent to the site managers that notify employees and stakeholders implied - Reminder sent the day prior to the site visit, with contact of site visit participants
CAR #06	List of all relevant laws and regulations covering workers' rights in the host country Kenya missing at 2.3.2 of the PD.	Section 2.3.2 of the PD updated
CAR #07	Measures in place for addressing potential hazards and safety risks associated with implementation of the project activities is inadequate. For instance, at the sampled collection hubs visited during the assessment period, it was observed that emergency route/signage including marking of fire assembly points were unclear. Fire assembly points have been made in some sites visited but inadequate e.g., too small for the number of employees onsite per shift. Also, unmarked instructions for electricals were evident in all collection hubs visited.	Emergency route/signage, fire assembly points and instructions for electricals have been updated in each Collection Hub and in the Factory, following the auditor's comments. Justifying documents: - HSE folder
CAR #08	2.3.1 of the PD confirms that waste pickers are also provided with adapted PPE gear and trainings (at least twice a year). however, it was observed at sampled collection hubs visited in Malindi and Mombasa that not all workers onsite during PP operational activities were in appropriate PPE's (including gloves, boots) A worker health and safety committee help monitor and advise on health and	PPE equipment stock and usage is tracked at each collection hub and at the factory. MGA has established a dedicated Standard of Procedure for PPE issuance and return. Stakeholders can also use the SPEAK OUT procedure for requesting new PPEs, or address the demand directly to their site manager. Meeting minutes of the Health and Safety Committees from 2023 have been shared.

	safety programs but meetings minutes affirming the implementation on monitoring actions were also missing from documents submitted by the project. Preventative measures in place aimed at avoidance negative health impacts, within the project activities, on the project actors and community is inadequate. It was observed at the visit to a collection hub in Malindi that the risk of flood within the working space is high during the rainy season due to poor drainage system, however mechanism to avert such potential risk is yet to put in place by the PP.	For the Malindi Collection Hub subject to risk of flood, the team is currently moving bales to another place to allow construction of a water way. The collection hub will soon move to a new warehouse under construction, to be ready in 2 or 3 months from now. Justifying documents: - HSE folder
CAR #09	PP is requested to complete section 2.2 now that the public comment period has been completed, adhering to the instructions of the Validation Report Template: "Demonstrate how due account of any comments received during the public comment period has been taken. Include details on any updates to the project design, or demonstrate the insignificance or irrelevance of comments. Note – This section is only required to be completed after the 30-day public comment period, prior to validation or crediting period renewal. However, if any general comments on the project activity from local stakeholders were received prior to the commencement of the public comment period, please include those here."	Section 2.2 of the PD updated
CAR #10	PP is requested to resolve the following regarding stakeholder access to project documentation: - Through the stakeholder interviews conducted during the validation it was observed that the stakeholders have little to no knowledge of a) the Plastic Waste Reduction Program and the project's objectives under this program, and b) how they can access project documentation	The Local Stakeholder Consultation support has been shared to all participants after the meeting. Both the Plastic Waste Reduction program and the project's objectives under this program are mentioned and have been described orally. A translated version of the Local Stakeholder Consultation support and a one-pager summary has been also shared to the stakeholders.

		Stakeholders are regularly informed of the various steps of the plastic credit certification process.
CAR #11	Through the stakeholder interviews conducted during the validation it was gathered that none of the stakeholders were informed of the 30 day public comment period, and how they could submit any comments they might have through the Verra Registry	The 30-day public comment period was ongoing at the time of the Local Stakeholder Consultation. It has been mentioned and explained to all the participants, and Verra Project ID has been communicated.
CAR #12	2.3.5 of the PD does not include the description the additional certifications (ISO 5512-1) impact confirmed to implemented by the PP and the positive social and environmental impacts beyond those that are included in the Plastic Program	MGA has obtained REACH certification tests. The certification for ISO 5512-1 is still under validation. MGA is also the first plastic recycling company to be a Certified B Corporation on the African continent.
CAR #13	The project does not have a documented procedure for obtaining free, prior and informed consent in conformance with the definition provided in Box 3, page 25 of the Plastic Standard v1.0	'MGA workers are willingly working with MGA. No property rights are impacted by any of MGA's collection and recycling instances. The factory is located in the industrial area, and the Collection Hubs are businesses with proper lease agreement. Stakeholders' free, prior and informed consent is part of MGA's Stakeholder Engagement procedure. The Local Stakeholder Consultation was also a useful way to verify every stakeholder's free, prior and informed consent on the project. The documented procedure is mentioned in the Local Stakeholder Consultation support.
CAR #14	PP is requested to resolve the following regarding energy efficiency and GHG emissions (section 2.3.3): - It is not indicated what the amount of energy consumption of the project activities and whether it is conservative for the activity type - It is not indicated what measures are implemented to ensure energy efficiency	'MGA conducted an energy audit in December 2021. Thanks to that, MGA was able to implement various energy saving measures such as changing lights to LED, install new industrial equipment or optimize the Operation and Maintenance procedure. All changes have been quantified in terms of estimated GHG emissions reductions. In addition, the plant runs purely on electricity received from the main substation. Finally, MGA has recently bought new electrical forklifts to replace the Diesel ones, reducing its total GHG emissions.

	of (the technologies used in) the project activities - It is unclear whether all technologies used in the project activity have energy efficiencies similar to or greater than equivalent technologies used in the region - Details on GHG emissions from the project activity are not provided - It is not described how the project proponent monitors greenhouse gas (GHG) emissions and ensures that any increase in emissions as a result of project activities, where unavoidable, is minimal - It is not described if and how where feasible, the project proponent implements the least GHG emission-intensive activities and/or technologies The recycled plastic produced displaces the use of virgin plastic – Kindly described how this is achieved.	Further information is given in the Energy Audit Report and in 2023_GIF_MGA indicators reporting. MGA also recycles its own water use, lowering the total volume of raw water required. The recycled plastic produced displaces the use of virgin plastic, meaning that plastic products will be produced with recycled plastic instead of virgin plastic. As GHG emission factors of mechanically recycled plastics are lower than virgin plastics' ones, this results in lower GHG emissions globally.
CAR#15	2.1.10 section of the PD does not clearly state how much time in advance information about the validation/verification body's site visit is/will be communicated to stakeholder before a site visit occurs.	Section 2.1.10 updated: see CAR05
CL#01	2.3.2 of the PD states "There is also no loss of employment or income generation as a result of project activities" kindly clarify this statement.	'The phrase was deemed inadequate, and has been replaced by the following: "As a result of project activities, the number of MGA direct employees and sourcing partners is significantly growing, resulting in various job creations throughout the host country." Evidence can be found in 2023_GIF_MGA indicators reporting

CL#02	2.1.9 of the PD on stakeholder access to project documentation states “project proponents also intend to provide project documentation to all stakeholders through the regular communication channels”. Kindly emphasize on the regular communication channels established.	The most common communication channels are by word-of-mouth, email, WhatsApp and calls, or business events. The various modes of contact for each stakeholder group have been indicated in the Stakeholders Attending Plastic Credit Meeting document.
FAR#01	Monitoring system to ensure compliance with project partners inadequate. Project team to develop a more improved monitoring plan and implementation actions be checked during the next monitoring period	Compliance with project partners is described in the MGA Stakeholder Engagement Tracker 2024 document. The monitoring plan and implementation actions will be enhanced for the next monitoring period.
FAR#02	Measures put in place (including instructions, signages etc.) for addressing potential hazards and safety risks associated with implementation of the project activities to be checked during the next monitoring period.	Emergency route/signage, fire assembly points and instructions for electricals have been updated in each Collection Hub and in the Factory, following the auditor's comments. Health & Safety follows a continuous improvement process, so other measures will be put in place thanks to the regular Health & Safety Committees.