

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
3	Other	Additionality	7.1	No suggested changes to the EPR treatment		This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to ensure that project proponents list all EPR schemes relevant to the project activity in the applicable region. EPR schemes will only be used to indicate an existing legal requirement if the EPR scheme is mandatory. Mandatory schemes can include those required by law, those which could result in legal redress and those which enable the authorities to require that brands/private companies undertake collection.
4	Other	Additionality	7.2	The proposed thresholds are appropriate, but the analysis will come at an additional project cost.		This section has been revised so that the positive list no longer includes a threshold for the technology penetration rate and material collection rate. Regarding the requirement for a project to determine the activity penetration rate in the additionality section, consultation with relevant stakeholders (primarily waste management practitioners), have shown that the inputs necessary for this assessment are already collected by project proponents during their project feasibility assessment. Thus, there is not likely to be a significant increase in cost for the determination of this value. For ease of understanding and execution of this assessment, this section provides guidance on how to undertake this analysis.
5	Other	Additionality	7.3	It would be preferable to use the positive list and benchmark analysis for the first few years of the Plastic Program.		Your comment is noted. The <i>Plastic Waste Collection Methodology, v1.0</i> uses a positive list to help projects most in need of finance demonstrate additionality. The options of an activity penetration or investment analysis is also offered for projects that do not meet the conditions in the positive list.
7	Service Provider	Additionality	7	Additionally for grouped projects might not be clear. For example, the pilot project proposed by SCS and Natural Capital Partners is a grouped project within some countries in Southeast Asia. Singapore is on the list of the SIDS, but the rest are not in there. According to the plastic accounting program, additionally must be assessed together for grouped projects.		Per Section 3.3.11 in the <i>Plastic Standard, v1.0</i> , if the additionality of the initial project activity instances in a grouped project within a particular geographic area cannot be demonstrated for the entire geographic area, the geographic area should be redefined such that each geographic area (represented by a geodetic polygon) can use the same rationale/method to demonstrate additionality. This means that the countries that would warrant the use of different methods to demonstrate additionality would have to be considered to be different geographic areas.
13	Industry	Additionality	7.2	Question 4: Threshold rates appear reasonable, however technology penetration and collection rates may prove more difficult to assess	Please define what 'technology penetration' covers, would this also include 'operational systems'?	This section in the <i>Plastic Waste Collection Methodology, v1.0</i> no longer includes the option for projects to use the positive list based on a technology penetration rate or a collection rate. The revised positive list only allows for projects that are located in LDCs, SIDS and SUZs to be deemed automatically additional based on the positive list.
15	Service Provider	Additionality	7.3	Question 5 a-c	a. In terms of project size, investment opportunity may be the only concern there and it is smart to consider leniency for small scale projects. I believe that small projects will be beneficial and more manageable than larger ones, paving the way for streamlining bigger projects in the future. b. Yes definitely. Capacity building will be critical in establishing mainstream participation and collection and identifying gaps and needs are an important component.	Given the lack of available and adequate data required to determine the threshold for categorization of projects based on scale, categorization by scale is no longer included in the methodology. However, such threshold may be included in future versions of the methodology should there be an improvement in data availability. Your point on the importance of capacity building has been noted for future consideration should we decide to include a threshold for categorization by scale.
20	Service Provider	Additionality	7	Figure 2 acronyms	Suggest to define all acronyms when first used or have a list of acronyms - e.g. SUZ is not defined until later	Thank you for your comment. The acronyms LDC, SIDS and SUZ are written in full and defined in their first instance in the document. Acronyms used in the methodology are either written in full and defined in the Definitions section or in their first instance in the document.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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21	Service Provider	Additionality	7.1	7.1 Regulatory Surplus	This section is a bit confusing. In many locations regulations and BAU practices may be at odds, ie in rural regions where waste management is regulated but irregular, which leads to poor waste management practices, ie burying/burning. Also, in many places waste collection is regulated and may be diverted to landfill both secure and insecure, but wouldn't a better outcome be for waste to be diverted to recycling?	<p>Project proponents can demonstrate widespread non-compliance of relevant regulations/laws in the region in the case that waste management is regulated but is irregular. The purpose of the regulatory surplus requirement is to ensure that only projects that are not required by law, exceed existing regulation or where regulations are not widely enforced are deemed eligible under the Plastic Program. This is to make sure that finance is not directed towards projects that could be implemented in the absence of credit finance.</p> <p>The <i>Plastic Waste Collection Methodology, v1.0</i> allows for projects to collect waste and take it to landfills to account for cases where there are no other reasonably accessible end of life options. The Plastic Program considers both landfills and recycling as eligible end destinations as long as the applicability conditions in the methodologies are met. Section 4.1.7 in the methodology lists the requirements that a landfill must meet to be considered an eligible end destination.</p> <p>Demand for Waste Recycling Credits in the market will encourage projects to invest in recycling of the collected waste. Recycling is also encouraged over taking waste to landfills in the <i>Guidelines for Leadership in Corporate Plastic Accounting</i>.</p>
22	Service Provider	Additionality	7.1	7.1 Regulatory surplus, row 4-6 (first sentence)	The meaning of this sentence is unclear and may need to be split into more than 1 sentence and/or the punctuation changed. It is unclear how the last section "without being registered as a project activity under the Plastic Program" relates to the first 2/3 of the sentence and what the meaning or intent of the sentence is.	The language in the <i>Plastic Waste Collection Methodology, v1.0</i> has been revised to clarify that the project has to exceed existing regulations or that no existing regulations apply to the project prior to being registered as a project activity under the Plastic Program. The statement "without being registered as a project activity under the Plastic Program" has been deleted to avoid confusion.
23	Service Provider	Additionality	7.1	Section 7.1, p 15, rows 1 - 3	The requirement "Compliance with a law or regulation in a given region shall be measured by the total number of relevant entities in the region complying with the law or regulation divided by the total number of relevant entities in the region to whom the law or regulation applies." will be very hard if not impossible to demonstrate in many instances.	Your point is noted. However, based on further consultation with primarily waste management practitioners and industry bodies, we found that such data is reasonably available through primary surveys, typically undertaken as a part of project feasibility assessments, as well as through local regulatory/administrative bodies. Given that this data is reasonably accessible by projects, no revisions have been made to this section.
24	Service Provider	Additionality	7.2.1(2)	7.2.1(2)	<p>Given that project boundaries are deemed to be relatively large, eg entire country or large region as outlined earlier in project boundary section - Why is the threshold for collection activity penetration at 2.5%? This seems to unnecessarily preclude a significant amount of plastic collection, particularly in developing countries where waste collection may be spatially heterogeneous.</p> <p>Perhaps I'm missing the intent but I also see how this would preclude any expansion opportunities. ie in a developing island nation there are waste pickers - 100% of waste is collected by waste pickers, therefore any project that improves or increases on waste picker governance, capacity and infrastructure would be ineligible. or in the case of a developed country where waste collection is coordinated by local authorities -eg truck - it reads so as to preclude any project where trucks are used to collect waste.</p>	<p>The definition of "region" in the <i>Plastic Program Definitions, v1.0</i> has been revised to clarify that it is preferable for the region to only encompass the source, project activity and end destination of the project rather than the entire country. The region may include an area larger than this (e.g., the entire country) in the absence of data for the preferred scale of the region. Please note that the project boundary is only required to include the plastic waste collection site, the project activity and the appropriate end destination of the collected plastic waste.</p> <p>Please review the response to comment #13 for further details on the technology penetration rate in the positive list.</p> <p>A project located in a developing island nation will likely be able to use one of the criteria included in the positive list (e.g., being located in an LDC, SIDS or SUZ) to demonstrate additionality.</p>

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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25	Service Provider	Additionality	7.2.1(3)	7.2.1 (3)	Where is this data meant to come from? This data will be very difficult if not impossible to obtain in many countries and regions. Is there a justification for the 5% threshold?	<p>The collection rate option has been deleted from the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i>. Per the methodology, projects can use the positive list to demonstrate additionality by being located in an LDC, SIDS or SUZ.</p> <p>The additionality section has also been revised to include an activity penetration test that allows projects that can demonstrate that the activity penetration rate of collection is below 20% in the region they are operating in to be deemed additional. This threshold is based on the 20% common practice threshold in the <i>CDM Methodology tool: Common practice</i> https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-24-v1.pdf</p>
26	Service Provider	Additionality	7.2	Comment on "Note to Reviewers" text box in PDF version of the meth (p 16 - 17)	This is unnecessary - it doesn't need to be innovative to be additional or have a positive outcome. It also seems likely that small-scale innovation may be additional but not always - particularly if implemented by a specific industry	<p>Your point is noted. Please review the response to comment #13 for further details on the technology penetration rate in the positive list.</p> <p>Since the technology penetration rate is no longer included in the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i>, the explanation provided on Roger's diffusion model is no longer applicable to the methodology.</p>
31	Industry	Additionality	7.3	Small scale project should be distinct from large scale projects, due to the disadvantages small and remote communities experience, in particular transport costs, high leakage rates and lack of infrastructure. Small scale projects would typically process under 1 ton of materials per day and be defined by a particular geographical location, eg island, remote region.		<p>Given the lack of available and adequate data required for determining the threshold for categorization of projects based on scale, the <i>Plastic Waste Collection Methodology, v1.0</i> does not currently include such a provision. However, such a provision may be included in future versions of the methodology, depending on the data collected from projects that register under the Plastic Program and further research. Relatively small projects in regions that are remote or low-income (e.g., located in an LDC, SIDS or SUZ), are deemed automatically additional based on the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i>.</p>

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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36	Industry	Additionality	7.2.1	<p>Question 4a:The Draft Methodologies do not address "Remote Projects". Remote Projects are similar to "Rural Projects" in that they have low population density, i.e. are small. However Remote Projects need to be distinguished from Rural Projects in that they are a significant distance from urban areas, and or separated by sea (i.e. islands), and or are coastal projects where significant plastic waste from other territories washes ashore.</p> <p>We therefore propose a new positive list criteria for the Collection Methodology which is "Remote Location"</p> <p>Please see full response and reasoning for this proposal in the "Other general feedback" section of the "CM Comments by Section" tab.</p> <p>We also propose that a capacity threshold of 250 tonnes per year (similar to the threshold approach taken in the recycling methodology) be added. This threshold may approximate the plastic waste generated by a small community with a population in the range of 5,000-10,000 people:</p> <ul style="list-style-type: none"> - the average person produces 50 kg plastic waste per year - 5,000 people will produce 250 tonnes - assume 50% is collected, 10,000 people would produce 250 tonnes - 150 tonnes would likely be associated with a smaller community (e.g..of a few thousand people) and therefore may be too low of a threshold 		<p>The categories of locations included under the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i> include the suggested type of projects (remote projects) since projects located in LDCs, SIDS and SUZs are deemed automatically additional based on this positive list.</p> <p>Given the lack of available and adequate data required for determining the threshold for categorization of projects based on scale, the methodology does not currently include a provision to categorize projects by scale. However, such a provision may be included in future versions of the methodology depending on data obtained from projects registered under the Plastic Program and further research. Relatively small projects in regions that are remote or low-income (e.g., located in an LDC, SIDS or SUZ), are deemed automatically additional based on the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i>.</p>
39	NGO	Additionality	7.2.1	<p>Question 4a: No. Indonesia falls between the cracks, as does Malaysia. Maybe an automatic inclusion based on local per capita income (to exclude wealthy urban communities) for communities who are coastal or near waterways (and therefore most at risk of polluting the oceans from inadequate plastic waste management).</p> <p>Question 4b: Technology penetration and collection rate will not be easily demonstrated by project proponents.</p>		<p>Per the <i>Plastic Waste Collection Methodology, v1.0</i>, project activities included in the positive list are deemed automatically additional (e.g., activities located in an LDC, SIDS or SUZ). Projects that cannot use the positive list to demonstrate additionality can use the activity penetration rate or investment analysis options to demonstrate additionality.</p> <p>Please review the response to comment #13 for further details on the technology penetration rate in the positive list.</p>
40	NGO	Additionality	7.3.2	<p>Question 5: why the distinction between small and large scale? Wouldn't large scale projects be just as worthy of credits, if not more, because of the scale of efficiency achieved? If additionality is the main criteria, the distinction between small and large scale projects seems arbitrary. If the intention is to deny richer nations access to credits, then the positive benchmark analysis should adequately address these concerns. Note the comments on positive benchmark deficiencies in CM Comments by Section.</p>		<p>There was a consideration to categorize projects by scale to reduce the burden of demonstration of additionality for small-scale projects. This would help lower the barrier to entry for small-scale projects that might find it too expensive to meet the current requirements of the Plastic Program. However, please refer to the response to comment #31 to understand why categorization by scale has not been included in the <i>Plastic Waste Collection Methodology, v1.0</i>.</p> <p>Irrespective of whether categorization by scale is included, we have tried to ensure that the Program is as friendly to small-scale projects as possible.</p>
45	NGO	Additionality	7	<p>Additionality needs to be demonstrated for our project since Indonesia is not a LDC nor SIDS (Singapore, by the way, is an SIDS).</p>	<p>Maybe we can draw the line for applicability with reference to per capita income, where Indonesian rural communities can qualify for the credits scheme automatically? And proximity to waterways and oceans, where the risk of plastic entering the ocean is far greater.</p>	<p>Only projects that are located in LDCs, SIDS or SUZs will be deemed automatically additional per the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i>.</p> <p>Projects located in countries like Indonesia can use the activity penetration rate test or the investment analysis to demonstrate additionality. Most projects located in regions that meet the criteria described in the comment are likely to be applicable per the positive list.</p>

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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46	NGO	Additionality	7.2.1(2)	Primary technology for collection not having a penetration rate of 2.5%	Meaning, if our collection method is cart and labour, which has an almost 100% penetration rate in Bali, we do not qualify to meet the additionality criteria?	Please review the response to comment #13.
47	NGO	Additionality	7.2.1(3)	Not more than 5% of each material type is being collected in the 'region'	Region needs to be defined. Again, Les may fail this criteria because the plastic waste collected through the borongan (rag and bone) channels may exceed 5%.	The collection rate option has been deleted from the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i> . Projects located in an LDC, SIDS or SUZ are deemed automatically additional according to the positive list. The definition of "region" has been revised and included in the <i>Plastic Program Definitions, v1.0</i> . The preferred scale of the region includes the project source, activity and end destination, but can include an area as large as the country the project activity is located in based on the availability of data.
48	NGO	Additionality	7.3	investment analysis will be beyond the capacity of most remote communities.	How are remote communities expected to satisfy the feasibility study parameters required? IRR is an unnecessarily complicated and inaccurate way of demonstrating additionality. The better financial analysis will be negative cash flow from operations.	Negative cash flows are generally used as an assessment criteria for projects with no revenues other than those from credit finance, which is a possible scenario for entirely voluntary activities (from source until end destination). However, these activities are not likely to be commonplace. With the recognition that not all projects may be able to determine IRR, the investment analysis section in the <i>Plastic Waste Collection Methodology, v1.0</i> has been revised to allow projects to use relevant/applicable financial indicators (not just IRR) and compare them with corresponding benchmarks.
56	NGO	Additionality	7.1	Question 3: Yes, EPR schemes should be included as part of the regulatory surplus assessment. No, the guidance provided is not sufficient to avoid confusion of how EPR schemes should be treated. EPR schemes need to directly contribute to the local REDUCED consumption of plastic and increased collection and recycling of plastic in LDCs, SIDS, SUZ, small, rural and coastal communities, and large cities worldwide. EPR schemes could directly benefit and recuperate some of their expenses and, or costs of implementing EPRs, through royalties from the profits derived from the sales revenues of value-added products in each LDC, SID, SUZ, small, rural and coastal communities, and large cities worldwide.		Your comment on the importance of consideration of EPR schemes is noted. The <i>Plastic Waste Collection Methodology, v1.0</i> contains further guidance on how to address EPR schemes under the regulatory surplus assessment. This includes guidance on what constitutes a mandatory EPR scheme and how voluntary schemes should be treated.
57	NGO	Additionality	7.2.1	Question 4: a. Unable to comment. b. Transparency, traceability, tracking and reporting of the journey of plastic throughout the plastic value chain from production through recycling, upcycling or other transformation of waste plastic into value-added products will be an additional cost to project developers' general market/feasibility assessment. This additional cost could be recovered by project developers from EPR schemes receiving royalties from revenues created by value-added products from plastic waste.		This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> so that the positive list no longer includes a threshold for the technology penetration rate and material collection rate. Only projects located in LDCs, SIDS or SUZs can use the positive list to be deemed automatically additional.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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58	NGO	Additionality	7.3.2	<p>Question 5: a) Yes, the distinction between small and large scale projects should be included in this methodology. Given the lack of data to support this categorization, the distinction should be included eventually when enough data is available.</p> <p>b) No, the categorization should not take into account regional data for a sample based on a project capital investment and annual revenues to establish a correlation between capacity and viability. EPRs should cover these. In some regions they may lose revenues from investment while other regions could provide revenues to make up for the difference.</p> <p>c) Yes.</p>		As mentioned in your comment, the <i>Plastic Waste Collection Methodology, v1.0</i> does not include a threshold for categorization of projects by scale due to the lack of available data to determine such a threshold.
61	NGO	Additionality	7.1	<p>Question 3: EPR schemes are very relevant, therefore, very useful to include this assessment. It is clear that they should be part of the assessment only if they are mandatory.</p>		Thank you for your confirmation that the guidance provided in this section is sufficient. This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to further clarify how EPR schemes should be considered and what constitutes a mandatory EPR scheme.
62	NGO	Additionality	7.2.1	<p>Question 4: a. What criteria can be used to determine that the project is in a region with similar technological, economic, regulatory and environmental conditions? (p. 15, L. 18). Requirement 3) sounds a bit contradictory with the purpose of recovering and diverting material from the environment. It creates a disincentive to do cleanups if there is already some recycling ongoing in the region. What is the purpose behind?</p> <p>b. Are there methodologies to estimate the maximum adoption potential of the technology? (it could be a little subjective, if not a method is established). Cleanup projects do not necessarily look at market assessment, therefore, this requirement could add costs.</p>		This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to not include this language. Please review the response comment #13 for further details on revisions made to this section.
63	NGO	Additionality	7.3.2	<p>Question 5: Recognizing that small scale projects require some relaxation and leniency, categorization should be included in the Plastic Program. However, if the benchmark analysis allows for including some degree of differentiated requirements for certain projects, c) could be a good alternative.</p> <p>If categorization is kept, is should also consider processing capacity. Considering only financial information is not enough.</p>		Please review the response to comment #31.
80	NGO	Additionality	7.1	<p>If EPR schemes are included in the regulatory surplus assessment, we should be careful not to disincentive the development of such schemes. In the CDM context, I know of at least one country which delayed a domestic carbon emission regulation in order to remain CDM eligible.</p>		<p>Your point is noted. We recognize that countries may hesitate to make EPR schemes legally required so that projects can continue to use the Plastic Standard.</p> <p>However, one of the (indirect) objectives of the Plastic Waste Reduction Program is to open up waste management markets and encourage plastic waste reduction related legislation by demonstrating the business case for the same. In other words, the Program will incentivize the growth of low-value plastic waste management markets and demonstrate that legislation on the management of this waste will be viable.</p>

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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81	NGO	Additionality	7.2.1	It would be good to add countries with a high volume of mismanaged plastic which do not qualify as LDCs or SIDS to the positive list. Our river model could be used to identify these countries.		Per the <i>Plastic Waste Collection Methodology, v1.0</i> , projects may use the positive list to be deemed automatically additional if they are located in an LDC, SIDS or SUZ. Projects that cannot use the positive list to demonstrate additionality can use the activity penetration rate or investment analysis to demonstrate additionality. Projects located in areas with a high volume of mismanaged plastic waste should be able to demonstrate additionality with the use of the activity penetration rate analysis since it compares the ratio of the annual plastic waste collection and annual plastic waste generation to a defined threshold value (20%).
82	NGO	Additionality	7.2.1(2),(3)	The collection rates and market penetration rates need further discussion. As currently drafted they appear an disincentive for large, scalable solutions.		Please review the response to comment #57.
83	NGO	Additionality	7.2.1(3)	collection rates may differ for the various materials that will be taken out of the environment. Which rate is then decisive?		The collection rate option has been deleted from the positive list in the <i>Plastic Waste Collection Methodology, v1.0</i> . Per the methodology, projects can use the positive list to demonstrate additionality by being located in an LDC, SIDS or SUZ.
84	NGO	Additionality	7.3.2	Barrier Analysis: We are currently developing our projects on the assumption that we can only monetize part of the plastic catch (if at all) through recycling. Most funding will come from a variety of donors, such as philanthropy, the crowd, governments and corporate sponsors. Of course, adding a plastic crediting scheme would be quite beneficial but we can't say that the projects would not be feasible without the revenue from plastic credits. As a non-profit, our mission is to make them feasible.		Your point is noted. However, to be eligible to use the <i>Plastic Standard</i> and the methodologies, project proponents must demonstrate that their project would not be feasible without revenue from the sale of Plastic Credits. This is because the Standard is based on the concept of additionality which requires that a project only be deemed additional if credit financing enables performance above a baseline that would not occur in the absence of such financing. Given the many ways to demonstrate additionality, you may find that only a portion of your activities is eligible based on the additionality tests required in the <i>Plastic Waste Collection Methodology, v1.0</i> .
85	NGO	Additionality	7.3.2	Question 5: What is the categorization based on if not data? Maybe leave out until further defined. Right now it seems too loosely defined to be operationally easy to navigate		Please review the response to comment #31.
92	Service Provider	Additionality	7.1	If the compliance rate is determined by the number of entities, this may not be representative, since larger municipalities would have the same impact on the ratio as very small municipalities (e.g. it could be that compliance rate on a waste basis is over 90%, but the ratio is less than 10% if a large number of small municipalities does not have any collection system in place). Besides, this does not reflect the difference of urban and non-urban areas in the region.		Compliance rate should not be confused with collection rate. The objective of checking compliance rate is to determine the spread/penetration of the practice of waste collection with respect to existing regulations. Referring to the example provided in the <i>Plastic Waste Collection Methodology, v1.0</i> , two municipalities collecting more plastic waste does not compensate for the remaining 18 municipalities in the state not collecting plastic waste. This is analogous to tax compliance where even if 10% of the population accounts for 90% of income tax payable to the government, the compliance rate will remain at 10% if only 10% of the population pays taxes. This applies for the private sector too. For non-urban regions, project proponents are encouraged to check for regulations in the applicable region and follow the above procedure to check compliance.
93	Service Provider	Additionality	7.2.1(2),(3)	General question to consider for both methodologies - should the 'positive list' or broader additionality process include an option for projects that strengthen the national plastic value chain (i.e. for projects that avoid transboundary transport of virgin and waste plastic by increasing local waste collection for national recycling, and/or national recycling infrastructure)?	Consider whether project impact on the applicable region's dependence on the transboundary transport of plastic (virgin and waste) materials should be included as a consideration in additionality / baseline assessments	It is difficult to demonstrate such an aspect of a project, and equally difficult for this to be verified by a validation/verification body. However, based on the inclusion of a wide range of projects in the Plastic Program, Verra may consider conditions/criteria for the demonstration and verification of such aspects, as well as eligibility conditions for the inclusion of such projects during future revisions of the methodologies.
94	Service Provider	Additionality	7.2.1(2),(3)	If the region is defined as the whole country (As suggested in the definition), the 5% collection ratio is unlikely to be met, even if the project is focused on a rural area.	Can distinction be made (i.e. higher threshold) for projects in rural areas?	Please review the response to comment #83.

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95	Service Provider	Additionality	7.2.1(2),(3)	Not clear what happens if a project partly meets the positive list criteria, could cause confusion.	Clarify that projects must proceed to the next steps if the entire project does not fit the positive list options. Clarify in the written text the steps the project must take if the whole project does meet the positive list (i.e. do they need to undertake common practice analysis - see below - or proceed to section 8)	Your point is noted. This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to include outcome boxes similar to the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> . These boxes indicate the next steps a project proponent should take based on the outcome of the prior step.
96	Service Provider	Additionality	7.2.1(2)	In this methodology, do 'technology(ies)' refer mainly to ocean and river cleaning technologies, or are other types envisaged? As ocean/river technologies are all early stage there may not be an official source of information, but would more likely be the result of desktop searches / competitor surveys of other projects in the region - would that be considered sufficient proof of technology adoption? What happens in the case that there are several river clean-up projects in the same region but using different 'tech/methods' - would they all count as 'first of their kind' even though the intention is the same? Is the penetration rate (<2.5%) supposed to be calculated with or without the project proponent's project?	Clarifications. Provide examples of 'technology(ies)' and how distinctions can be made (i.e. for first of it's kind or not), add definition or explanation of how 'maximum adoption potential' can be determined.	Please review the response to comment #13.
97	Service Provider	Additionality	7.2.1(3)	It may be challenging to collect data on collection rate for each material type. In case data by type is not available, can projects use other categories (i.e. rigid, recyclables) or 'mixed plastics'?		Please review the response to comment #83.
98	Service Provider	Additionality	7.2.1(3)	Is the 'generation' rate referring to the total generation of that material type (i.e. PET) or the total generation of the waste of that material type (i.e. PET waste)? As above, what happens in cases when the project is not able to collect this data by material type?	Clarify generation rate (definitions?). Include note on data collection by material type/other categories	Please review the response to comment #83.
99	Service Provider	Additionality	7.3.2	Why include "barriers (risks), opportunities" in the investment analysis? This would be rather subjective to quantify. The CDM tool only considers cash flows. "Examples of barriers include technological, investment and institutional barriers" would be rather relevant in case a specific barrier analysis is allowed (which is not part of the investment analysis)	Delete "barriers (risks), opportunities" and add "investment costs, O&M costs and revenues" (or completely delete these items, since they are more detailed in the CDM tool and also include taxes etc).	This section (investment analysis) has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> by deleting the language that you pointed out and by providing examples of the costs and revenues that the project proponent may consider while performing the investment analysis. The project proponent may still consider barriers/risks as long as they can be monetized, as demonstrated in the CDM Guidelines on the Objective Demonstration of Barriers (https://cdm.unfccc.int/Reference/Guidclarif/meth/meth_guid38.pdf).
100	Service Provider	Additionality	7.3.2	Question 5: We support the inclusion of a project threshold with a streamlined process for projects with smaller collection capacity. This is to enable smaller projects, which are likely to face higher costs and be less financially feasible, to have a degree of leniency and reduced cost burden to demonstrate and meet requirements. A conservative threshold can be adopted in the first instance and can be revised as more market data is available/if another clear threshold emerges once the Standards have been in operation. The thresholds could be aligned between methodologies.	Assign a conservative threshold for small-scale projects.	Please review the response to comment #31.
101	Service Provider	Additionality	7.3.2	Question 5: As above, we think it is important to include more lenient measures for small-scale projects, including simplified demonstration of additionality.	Include option for small-scale projects to demonstrate additionality using simplified barrier analysis (As suggested in Note to Reviewers on pg 18, c))	Please review the response to comment #31.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
108	Service Provider	Additionality	7	The decision tree suggests that there is only one linear process for additionally, however it is then split into 3 sections.	Alignment between decision-tree format and subsequent layout - could be achieved by adding numbering into the decision-tree.	The decision tree has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to align with the content in the additionality section and represent the step by step approach that should be followed while attempting to demonstrate additionality.
109	Service Provider	Additionality	7	The methodology could be clearer on the process that projects need to take in determining additionality	Clarify which steps are mandatory, what the outcomes can be and the appropriate next steps at each stage	Please review the responses to comment #95 and comment #108.
110	Service Provider	Additionality	7	Could be streamlined to avoid needing to navigate to the CDM tool 01 (baseline and additionality v.7.0). Could also create confusion/be open to interpretation if only specific sections are mentioned and not specified how they relate to plastic collection	Include the requirements from the CDM tool directly in the methodology document, ideally adapting them to the context or remove - see our comment above	The additionality section in the <i>Plastic Waste Collection Methodology, v1.0</i> has been revised to include more detailed and contextual guidance and fewer references to external tools unless absolutely required. The investment analysis section has been revised to include guidance from the CDM tools that project proponents should be following to perform the investment analysis.
119	Industry	Additionality	7	Figure 2 introduces a number of terms not defined previously by the methodology (e.g., "country interbank rate"). It would be useful to either define these terms upfront, or use broader language until these terms can be more completely introduced to the reader.	Revise language in Figure 2 to be more broad.	Your point is noted. The decision tree for the demonstration of additionality has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> and no longer includes terms that have not been defined previously in the methodology. The revised decision tree only contains terms and references that have been defined earlier or in the appropriate place for ease of understanding.
120	Industry	Additionality	7.2.1	The sentence "Within a region with similar..." seems out of place in this paragraph.	Please restructure paragraph so that the context of this sentence is clear.	This sentence has been deleted from this section in the <i>Plastic Waste Collection Methodology, v1.0</i> .
128	Other	Additionality	7.1	Question 3: EPR schemes should be included as part of the regulatory surplus assessment if they are required by law. We understand that this is what is being proposed in Section 7.1.		Yes, Section 7.1 requires that EPR schemes should only be included as part of the regulatory surplus requirement if they are required by law. The <i>Plastic Waste Collection Methodology, v1.0</i> has been revised to provide further guidance on how mandatory EPR schemes are defined.
129	Other	Additionality	7.2.1	Question 4a: The definition of "primary technologies for collection" is unclear. How do you determine the maximum adoption potential of the technology? Benchmarking, maximum technical potential, etc.? This will have a big impact on the rate. The thresholds seem somehow arbitrary and very low. It would be good to elaborate further on how you derived these thresholds. Question 4b: Both the technology penetration and collection rate can be calculated easily by project developers, provided they can base their calculation on official data and statistics or approximations from official sources such as the World Bank. Data on informal collection and treatment ratios is scarce and unreliable by nature and should therefore not be required for a calculation of rates.		Please refer to the response to comment #57.
2	Other	Applicability Conditions	4.2.2	The approach on trans-boundary movement is appropriate. Yes, import should be limited to semi-processed waste.		The eligibility criteria for projects that import plastic waste has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to include a requirement for the pre-processing of waste (e.g., sorting by material, removal of impurities) in the case that collected plastic waste is being exported from an LDC or SIDS to ensure that waste is not dumped in the importing country and that the exporting country develops basic waste collection infrastructure.
8	NGO	Applicability Conditions	4.1.7	This section does not recognise the health implications of end of life options	give equal importance to environmental and health benefits	Environmental and social safeguard requirements are included in the <i>Plastic Standard, v1.0</i> to help identify and mitigate the potential negative impacts of a project. End of life options within the project boundary of the project that do not meet these safeguard requirements will not be eligible under the Plastic Program. The applicability condition regarding appropriate end destinations in the <i>Plastic Waste Collection Methodology, v1.0</i> also requires the project proponent to demonstrate that the end destination facility complies with relevant local or national regulations.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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9	NGO	Applicability Conditions	4.1	Rather than simply being more beneficial, projects should demonstrate they are sufficiently 'safe'	Work will need to be done to define 'safe', but would recommend a definition that incorporates looking at impacts on GHGs, biodiversity and people's health.	Environmental and social safeguard requirements are included in the <i>Plastic Standard, v1.0</i> to help identify and mitigate the potential negative impacts of a project. Any activities and end of life options that are included in the project boundary of the project are required to meet these environmental and social safeguards that address among others, impacts on greenhouse gas emissions, biodiversity and health and safety of the project actors. The applicability conditions have been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to highlight that the process of moving plastic waste from the environment (including open burning, dumpsites) or moving plastic waste that is incinerated without energy recovery to an appropriate end destination (as listed out in the methodology) will be considered as the collection of plastic waste. The methodology no longer includes a hierarchy of appropriate end destinations based on how environmentally beneficial they are.
10	NGO	Applicability Conditions	4.1.7	Note that the order of preference and relative environmental benefit of the options listed below may vary based on the technological, geographic or regulatory context of the project.' How will this be independently assessed? I would argue no low and very few middle income country governments have the capacity to safely regulate incinerators.		The applicability conditions have been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to highlight that the process of moving plastic waste from the environment (including open burning, dumpsites) or moving plastic waste that is incinerated without energy recovery to an appropriate end destination (as listed out in the methodology) will be considered as the collection of plastic waste. The methodology no longer includes a hierarchy of appropriate end destinations based on how environmentally beneficial they are.
12	Industry	Applicability Conditions	4.2	Agree with the above comment		Your agreement with the comment is noted. Please review the response to comment #2.
14	Service Provider	Applicability Conditions	4.2	Lack of equipment/infrastructure	In the case of end of life fishing gear recycling, we have been unable to identify recyclers with the capacity to handle this type of material in the United States. We are forced to collect and process material from the US and import to Europe and Canada for recycling. Perhaps language allowing for this type of circumstance would be helpful.	Your point is noted. The applicability condition on the transboundary movement of waste has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to ensure that LDCs and SIDS can collect, pre-process (e.g., sort by material, remove impurities) and export material if they lack the appropriate infrastructure for the management of the plastic waste. However, we would like to encourage the development of collection infrastructure in countries that have the economic means to do so since such countries can most likely develop local collection infrastructure without financial incentives. Your point regarding the lack of local recycling infrastructure is noted. The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised so that plastic waste can be exported if the exporting country can demonstrate that they lack sufficient plastic waste of that type to enable the development of local mechanical recycling infrastructure at the time of project validation. This revision to the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> will help address the situation described here.
17	Service Provider	Applicability Conditions	4.1.3	Last sentence (rows 20-23): Can "industry body" be added to the list of bodies		Your point is noted. "Industry body" has been added to the list of bodies that can be used to identify and demonstrate the sources of the collected waste in the <i>Plastic Waste Collection Methodology, v1.0</i> .
18	Service Provider	Applicability Conditions	4.1.6 lines 6,7,8	Requiring tracking "throughout the value chain" may be difficult, as recovered plastic may be on-sold more than once. E.g. some plastic types may be sold to a recycling company that cleans and pellets it before on-selling it to subsequent users. There may be co-mingling of multiple sources in this process without clear transparency regarding end buyers/users. Can you confirm how far along the value chain this needs to be tracked? i.e. all the way to end-use of the final recycled product(s)?		Your point is noted. This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to clarify that the project proponent only has to demonstrate that the material has been sold to an entity that is known not to manage waste in an unauthorized or illegal way. Per your comment, it will not be feasible to track the movement of the material throughout the value chain. This applicability condition has been revised to only require that the project proponent demonstrate through proof of transaction that the collected waste has been sold to an appropriate end destination (i.e., they will only have to account for the nature of the end destination included in their project boundary).

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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32	Service Provider	Applicability Conditions	4.1.7	4.1.7 - Use of plastic waste in construction materials should be classified as downcycling rather than reuse.	The use of plastic waste in bricks, etc. could also be seen as a form of recycling. Especially considering the potentially difficult treatment options of these materials at their respective end-of-life, this application should not be listed as top-priority under reuse.	As you will see in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> , only plastic waste recycling processes that are displacing the use of virgin plastic will be eligible to issue Waste Recycling Credits. Given this rationale, the process you describe cannot be classified as a form of recycling. However, we do recognize your point that the use of plastic waste in bricks should not be classified as reuse. We have revised this end destination to be "reprocessing" to reflect that this is not as good an option as "reuse" as you will see defined in the <i>Plastic Program Definitions, v1.0</i> .
33	Service Provider	Applicability Conditions	4.1.7	4.1.7 - Incineration with energy recovery - co-processing also shall comply with environmental standards	Just as other recovery options, co-processing shall be in line with international and/or industry standards. Also see: https://www.giz.de/de/downloads/giz-2020_en_guidelines-pre-coprocessing.pdf	The applicability condition regarding appropriate end destinations in the <i>Plastic Waste Collection Methodology, v1.0</i> has been revised to require that the project proponent demonstrate that the end destination facility complies with relevant local or national regulations. This will ensure that all appropriate end destinations (per the methodology) meet relevant national/local pollution control and environmental regulations.
34	Service Provider	Applicability Conditions	4.2.2	4.2.2 - This section should be further specified with respect to imports	Would projects involving the import of waste be able to generate credits for those amounts as well? That should be restricted to cases where there can be sufficiently demonstrated that no adequate treatment options are available in the export country. Otherwise, one would argue that the import for making a recycling activity worthwhile in terms of quality and quantity is an economic decision that should pay for itself and not be financed through a crediting scheme.	Please review the response to comment #14. The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised to allow projects to import plastic waste for recycling if there is insufficient plastic waste available in the exporting country to enable the development of recycling infrastructure at the time of project validation. This has been included to enable the development of recycling infrastructure and increase plastic waste recycling in the short term.
41	NGO	Applicability Conditions	4.1.2	requirement that collection be a new or capacity addition activity. How does one differentiate between waste from an existing collection channel versus new collection channel? Les's plastic waste is mostly from existing collection channels.	Why should credits only be paid for new collection? Credits enhance the value of plastic waste and therefore incentivises the village to make their plastic collection more efficient and widen the net. Delete this requirement.	This applicability condition allows for project activities that are new (e.g., a new activity that collects LDPE from a river) and for project activities that are adding on to existing activities (e.g., installation of more bins for collection of waste from households) to be eligible under the Plastic Program. This condition is not meant to only support new collection activities and disincentivize the scale-up of existing collection activities. This requirement does factor in collection from new vs. existing collection channels and only pertains to whether the project requires credit finance to start up or to scale up.
42	NGO	Applicability Conditions	4.1.3	Re: the need for someone to certify that if uncollected, will be left in the environment, incinerated or disposed in unmanaged landfill. This seems superfluous - it penalises and denies credits to authorities who are already collecting plastic waste responsibly. In any event, this will be left to the local waste management body in the local government to certify, and as recipient of credits, they will be in a conflict of interest to act as independent certifier.	Delete the need to certify	To clarify, the project proponent is required to demonstrate that the plastic waste would have been left in the environment, incinerated or disposed in an unmanaged landfill in the absence of the project activity to justify their selection of sources of plastic waste. If the plastic waste was being collected at baseline, it cannot be used as a source for the project activity. Given this, authorities that are already collecting plastic waste responsibly are not likely to be penalized.
43	NGO	Applicability Conditions	4.1.4	Managed landfill requirement	The requirements of a managed landfill bars most poor remote communities from the credits scheme. Perhaps the credits scheme should redirect some buyer credits towards sponsoring local government improvement of landfill infrastructure or environmentally friendly incineration.	Your point is noted. The definition of a managed landfill has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to only include the definition of "landfill" in the <i>Plastic Program Definitions, v1.0</i> and include the conditions that a landfill must meet to be considered an eligible end destination as an applicability condition. These conditions are suitable for projects in remote areas but do not allow the dumping of waste in sites with no landfill management procedures and high rates of leakage. Projects may include local landfills or incineration facilities (with energy recovery) in their project boundaries as long as they meet the applicability conditions in the methodology. Landfill infrastructure improvement is currently not an eligible project activity under the Plastic Program. However, it is up to individual projects to determine how revenues generated from the sale of Plastic Credits are disbursed among project actors.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
44	NGO	Applicability Conditions	4.1.6	Re: output should not end up in illegal/non-statutory activities within the value chain. It is impossible for Les village to certify where the intermediary plastic merchants sell the plastic to manufacturers who comply with this requirement	Delete this requirement. The plastic waste will have a second life, that is the main point - it displaces the use of virgin plastic in illegal/non-statutory activities. In any event, once shredded/pelletised, the fungibility of recycled plastic makes it impossible to trace where it will end up.	Please review the response to comment #18. As you noted, project proponents will only be required to demonstrate that the collected plastic waste ends up at an appropriate end destination per the <i>Plastic Waste Collection Methodology, v1.0</i> . The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> will also require the project proponent to demonstrate that the recycled plastic waste (except from projects that recycle composite materials) displaces the use of virgin plastic.
55	NGO	Applicability Conditions	4.2.2	Question 2: a. No, excluding transboundary movement of plastic waste from LDCs or SIDS and export to other countries (LDCs, SIDS or otherwise) for further processing, is not appropriate. b. No, there should be no import of semi-processed waste by any country. Each jurisdiction needs to be able to implement the Proximity Principle and benefit from the employment generated from recycling plastic waste locally in LDCs, SIDS, SUZ, small, rural and coastal communities or otherwise worldwide. These jurisdictions need to benefit from the sale of value-added products recycled, upcycled or otherwise transformed from waste plastic in plants that provide jobs at walking distance to the community in which they operate.		Please review the response to comment #2.
60	NGO	Applicability Conditions	4.2.2	Question 2: a. It would be better to be more flexible with this requirement. Governments are already approaching transboundary movement of plastic in their national regulation, therefore, if the country allows a transaction it could be also allowed by the Plastic Standard Program. This requirement would rather focus on checking the regulation of countries that will be involved in the transactions. b. Similar as the answer in a. maybe better to leave this to following regulation issued by countries involved in transactions.		Please review the response to comment #2. Per the <i>Plastic Standard, v1.0</i> , project proponents are required to demonstrate that the projects and the implementation of project activities do not lead to the violation of applicable laws, statutes and regulations irrespective of whether they are enforced. This requirement will ensure that project proponents that are engaging in the transboundary movement of plastic waste are complying with relevant national regulations in the exporting and importing country.
65	NGO	Applicability Conditions	4.1.3	The sources of collected waste shall be "certified", but in line 21 it is mentioned that it can be just demonstrated (not necessarily certified)	demonstrated (instead certified) Other possibility: identifiable OR certified	Your point is noted. The term "certified" has been removed from this requirement in the <i>Plastic Waste Collection Methodology, v1.0</i> . The project proponent will only be required to demonstrate that the source of the plastic waste is indeed an existing or a potential source of plastic waste.
66	NGO	Applicability Conditions	4.1.7	The definition of reuse here is slightly different from the one included in the Plastic Program Definitions. This one looks better, wider	Update "Reuse" definition in the previous document according to what is described here	Your point is noted. However, we have revised the use of the term "reuse" in this section of the <i>Plastic Waste Collection Methodology, v1.0</i> to "reprocessing" to better represent the nature of the end destination. The definition of "reuse" under the Plastic Program will remain as defined in the <i>Plastic Program Definitions, v1.0</i> .
67	NGO	Applicability Conditions	4.1.7	Co-processing is not defined	Please include a definition of co-processing.	The term "co-processing" is no longer used in this section in the <i>Plastic Waste Collection Methodology, v1.0</i> . The end destinations have been revised to broader terms to include as many appropriate waste management methods as possible.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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68	NGO	Applicability Conditions	4.2.1	disposal in an "unmanaged landfill" is sometimes allowed by local regulation (when they do not have alternatives)	Maybe good to add some flexibility as well (similar to incineration without energy recovery), but including some minimum conditions to be met by disposal sites	The requirements included for a managed landfill are to ensure that there is proper management in place at the site and that there is no leakage from the site. Allowing the dumping of waste in an unmanaged landfill would defeat the purpose of collecting the waste from the environment since high levels of leakage to the environment would still occur. The definition of managed landfill has been removed from the <i>Plastic Waste Collection Methodology, v1.0</i> as has the definition of unmanaged landfill. Instead, we have included applicability conditions that must be met in order for a landfill to be considered an eligible end destination. The conditions have been slightly modified to better allow for the collection and disposal of waste in remote areas or areas that do not have the resources to meet the previous definition of managed landfill.
75	NGO	Applicability Conditions	4.1.4	we see a risk of leakage if there's no verifiable chain of custody. Will that be addressed?		While we see your point, it will likely be too burdensome to require that projects track the movement of the collected material beyond the destination that they sell the material to. We have heard from pilot projects on-the-ground that chain of custody requirements beyond this would be burdensome and unreasonable, especially on small-scale projects.
76	NGO	Applicability Conditions	4.1.5	with our river plastic interception, dry weight may not be practicable. Would an estimated dry weight, based on a methodology to be validated by an independent third party, be acceptable?		We have included a broad definition of dry weight in the <i>Plastic Waste Collection Methodology, v1.0</i> . Per your comment, you may also determine the "dry weight" based on a method that is recognized by an accredited laboratory and/or relevant national/international guidelines as explained in the methodology.
77	NGO	Applicability Conditions	4.2.2	there may be valid economic and/or environmental reasons to allow transboundary movement, also if no LDCs or SIDS are involved.		Please review the response to comment #2
86	Service Provider	Applicability Conditions	4.1.3	There is a requirement that collected waste should be "identified and certified to be an existing or potential source of plastic waste that would have been left in the environment..." - would surveys undertaken by the project qualify as evidence, or would they need to be undertaken by a third party (i.e to be independent market research)? Smaller & remote projects might not have access to specific data and may not have the resources to fund external research.	Clarify if primary surveys can be suitable	Primary surveys conducted by the project proponent are acceptable only if they are attested by a competent authority or an expert to avoid any manipulation of information in favor of the project activity. Projects of all scales are generally preceded by a feasibility analysis which involves the collection and validation of the type of data/information required by this applicability condition. It is thus likely that acquiring this data will not impose additional cost or time burden on the project proponent.
87	Service Provider	Applicability Conditions	4.1.6	Will projects be penalised if they cannot demonstrate the full value chain transactions of the collected plastic material AFTER their project activity?	Change 'throughout the value chain' to 'the next stage in the value chain'	Your point is noted. We have revised this section of the <i>Plastic Waste Collection Methodology, v1.0</i> to clarify that the project proponent only has to demonstrate that the material has been sold to an entity that is known not to manage waste in an unauthorized or illegal way. Per your comment, it will not be feasible to track the movement of the material throughout the value chain. We have revised this applicability condition to only require that the project proponent demonstrate through proof of transaction that the collected waste has been sold to an appropriate end destination (i.e., they will only have to account for the nature of the end destination included in their project boundary).
88	Service Provider	Applicability Conditions	4.1.7	Consider adding a note that 'reuse' should not include applications that will directly lead to risk of environmental pollution		Your point is noted. This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> so that a project proponent is required to demonstrate that all end destinations comply with relevant local or national regulations, which will include pollution control regulations. Per the <i>Plastic Standard, v1.0</i> , project proponents will also have to demonstrate that all entities in the project boundary, including the end destination, meet the environmental and social safeguard requirements.
89	Service Provider	Applicability Conditions	4.1.7	If Verra intends to develop a methodology explicitly for chemical recycling, it would be beneficial to explicitly use the term in the list of suitable end destinations in this collection methodology	Change incineration with energy recovery - gasification or pyrolysis to 'chemical recycling - pyrolysis'	Your point is noted. The term "chemical recycling" is included as an applicable end destination in the <i>Plastic Waste Collection Methodology, v1.0</i> .
114	Industry	Applicability Conditions	4.1.1	The phrasing of this sentence is awkward in the context of the preceding statement.	Rewrite as "Project activities MUST result in plastic waste collection from the environment...". Overall, it would be useful to ensure that these lead-ins to each of the applicability conditions use consistent syntax.	Your point is noted. We revised the language here to ensure clarity and consistency with the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> .

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
115	Industry	Applicability Conditions	4.1.3	The term "certified" seems a bit strong for what this applicability condition is meaning to accomplish. Even where third party studies/research identify that certain sources of plastic waste would have been left in the environment, there may not be a "certification" as such that sits behind that claim.	Revise the term "certified" as "confirmed" or similar.	Please review the response to comment #65
116	Industry	Applicability Conditions	4.1.7	Where incineration without energy recovery is listed as an acceptable end-use of collected plastic waste, it is important to ensure that there are appropriate environmental and health safeguards in place in the relevant jurisdiction.	Add further requirements to this applicability condition to ensure appropriate health safeguards are implemented in the case of incineration without energy recovery.	The list of appropriate end destinations has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to no longer include incineration without energy recovery.
127	Other	Applicability Conditions	4.2.2	Question 2a: This approach seems reasonable, provided that you want to discourage the export of waste from developed and developing nations and encourage the development of a local waste management industry in these countries instead. However, you may want to consider that the import of high-quality plastics may actually enable the development of a local waste management/ recycling infrastructure in the importing country.		Your point is noted. Please review the response to comment #14. The intent behind this applicability condition is to ensure that countries that are economically capable of collecting plastic waste and developing plastic waste management infrastructure do so instead of exporting this waste. Per the revised applicability condition on this in the <i>Plastic Waste Collection Methodology, v1.0</i> , projects will only be able to export collected plastic waste if they are located in an LDC or a SIDS.
79	NGO	Baseline Scenario	6	"dumped" implies an intentional disposal of large quantities. Most of the plastic which aggregates in rivers gets there because plastic waste is mismanagement, carelessly disposed of. Is that covered here?		This section has been revised so that waste, whether it was dumped in the environment or ended up in the environment because of mismanagement, can be collected by a project using this methodology. The language has been revised so that the word "dumped" is not used.
118	Industry	Baseline Scenario	6	It is not clear what the project proponent is meant to do in respect of Section 6. In particular, there is no defined process for how the project proponent identifies and justifies their baseline scenario.	Add further specificity to Section 6 in order to clearly guide the project proponent in the identification and justification of their baseline scenario.	Your point is noted. The language in this section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> so that project proponents are aware that the baseline scenario represents plastic waste that would not have been collected from the environment, open burning, incineration without energy recovery, or dumpsites prior to project implementation. The <i>Project Description Template, v1.0</i> guides a project proponent on how to identify and justify the baseline scenario in accordance with the methodology, wherein the project proponent will describe how the plastic waste was managed prior to project implementation.
1	Other	Definitions	3	The definition of managed landfill is correct, and all conditions are important and should be kept. The reference to the ISO standard is positive and definitive.		We removed the definition of managed landfill in the <i>Plastic Waste Collection Methodology, v1.0</i> and instead included it as an applicability condition that must be met by all projects that include landfills as an end destination for collected plastic waste.
6	Service Provider	Definitions	3	Managed landfill: Definition of landfill: Some landfills in Third World Countries does not have a restrictions on access or other measures implemented. In Guatemala, the only landfill available does not comply with several of those points, and that would make Guatemalan projects unable to register. Other measures like control placement, be capped when it closes, sanitary lining, etc could not be followed by third world countries and will be out of the project proponents' action area.	My opinion would be that the project's landfill would not have to meet all requirements, or at least try to explain how waste scavenging will not be related to the project. Top requirements for me would be: 1. Be government recognised or affiliated. 2. Have a well-defined boundary. 3. Leachate drainage system.	Please review the response to comment #68

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
11	Industry	Definitions	3	<p>Managed landfill</p> <p>1. Question for consideration: Is the definition of managed landfill appropriate? Yes</p> <p>Should projects have to meet all of the above requirements, or are there top requirements that should be included in a subset of priority requirements?</p>	They should aim to address them, however regional/ remote areas will find 'daily cover' , and sanitary lining or other measures...to avoid direct contact on the ground' - difficult to adhere to. If a clause was added to 'eliminate or minimise and leakage of plastic materials in the air, water or soil' - this would be more specific and address the two above issues	Please review the response to comment #68.
35	Industry	Definitions	3	<p>Question 1: We have the following feedback from our pilot in Indonesia regarding sanitary landfills. The concern is that the requirements of the Plastic Standards as it pertains to landfill may result in rural landfills being excluded. We recognise that in order for recovery to be effective plastic that is recovered must go somewhere where it will not harm the environment however we hope that the solution keeps in mind smaller community challenges:</p> <ul style="list-style-type: none"> - In both Indonesia and the Philippines, 5-star sanitary landfill facilities were built for big urban areas. - Main reason is high construction and operational cost for which a large population base is a necessary justification. - Local governments usually take loans to afford it. - Rural areas may not have access to such loans and thus what they will most likely be able to access, if at all, are government-run dumps or semi-sanitary landfills. - The above results in a built-in structural bias for urban areas when it comes to sanitary landfills. - If the Plastic Standards only recognise these 5-star sanitary landfills, the result is likely to be (at least in regards to recovery/landfill element) that plastic from urban areas for which these landfills have been built is favored over rural areas that have difficulty accessing these landfills (due to cost etc.) 		Please review the response to comment #68.
54	NGO	Definitions	3	<p>Question 1: Zero plastic waste to landfill needs to be a requirement included in the definition of "managed landfill".</p>		The Plastic Program currently allows for plastic waste to be disposed of in a landfill that meets the applicability conditions set out in the <i>Plastic Waste Collection Methodology, v1.0</i> to ensure that plastic waste is collected and appropriately managed even in areas that lack other forms of waste management infrastructure. This also serves to ensure proper management of plastic waste that is collected but not currently considered recyclable. As a result, "zero plastic waste to landfill" cannot be included as a requirement in the definition of 'managed landfill'. Note, the definition of 'managed landfill' no longer exists and the conditions that qualify a landfill as an eligible end destination of plastic waste are included in the applicability conditions section of the methodology.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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59	NGO	Definitions	3	Question 1: This is a difficult aspect for projects aiming to collect waste from the environment. In several cases it is challenging to find good waste disposal practices (see, WB report 2018, cell E4). It would be good to define some categories and associate WRCs (amount or prices) with the type of disposal site used in the project. For instance, include three categories: controlled disposal, managed landfill, sanitary landfill, considering increasing requirements/standards according to each category. Some minimum requirements should be met, but also current and future actions from the government could be considered. If it can be demonstrated that the government is already working on restoration/remediation of the site, a project could be eligible. Although not in sanitary landfills, waste scavenging could be more flexible as it is very common in developing countries (for instance, instead of rejecting the site, asking for census of people developing this activities, safety procedures, etc.). About the requirements already mentioned in the methodology, a sanitary landfill should also include gas management, vector & bird control; should be built following engineering techniques; and should include a plan for closure and post-closure activities. World Bank report, 2018		Please review the response to comment #68. The point on waste scavenging has been revised to ensure that landfills with authorized waste scavenging activities are eligible as end destinations per the <i>Plastic Waste Collection Methodology, v1.0</i> . The point on capping the landfill when it closes has also been expanded to allow for the project proponent to use measures other than capping for post closure care. Revisions have been made to the conditions of an eligible landfill under this methodology keeping in mind that it should not become too burdensome for the project proponent to demonstrate compliance with the requirements and does not exclude potential/promising projects. Given this, your points on gas management and vector and bird control have not been added to avoid being too burdensome.
64	NGO	Definitions	3	Waste management: This definition could at least mention what Waste Management involves	Include: SWM refers to activities related to collecting, treating and disposing of solid material that is not longer useful to its owner (or something similar). Then the Basel Convention can be cited.	We have revised this definition to include "The collection, treatment, transportation and/or disposal of waste". Since this term is used in multiple documents under the Plastic Program, this definition has been moved to the <i>Plastic Program Definitions, v1.0</i> .
71	NGO	Definitions	3	Producer: typo is last line. Consumers/end users should be excluded from this definition.		Your comment is noted. However, this definition has been deleted from the <i>Plastic Waste Collection Methodology, v1.0</i> since this term is no longer used in the methodology.
72	NGO	Definitions	3	Managed landfill: are all criteria of equal importance?		Please review the response to comment #68
73	NGO	Definitions	3	Market penetration: percentage of total market value against which measure?		Your comment is noted. However, this definition has been deleted from the <i>Plastic Waste Collection Methodology, v1.0</i> since this term is no longer used in the methodology.
74	NGO	Definitions	3	Total market size: Is total market size the same as total market value? Seems like the two are equated here.		Your comment is noted. However, this definition has been deleted from the <i>Plastic Waste Collection Methodology, v1.0</i> since this term is no longer used in the methodology.
111	Industry	Definitions	3	Formal and informal waste sector activities: The distinction between "formal" and "informal" waste sector activities is not completely clear. Particularly where NGOs or other formally established entities are engaging in such activities, they would likely consider their activities to indeed be quite "formal".	A more useful distinction could be "regulated" vs. "non-regulated" waste sector activities.	The definition of informal waste sector activities has been revised to "Waste management activities carried out by individuals or a group of individuals who are not formally registered or regulated by local authorities or formally responsible for providing waste management services" in the <i>Plastic Waste Collection Methodology, v1.0</i> and the <i>Plastic Program Definitions, v1.0</i> to better distinguish informal from formal waste sector activities and for clarity. NGOs and other formally established entities can be considered as the informal sector for the purposes of this methodology since these entities help bring informal actors together, where the informal actors implement the project activity.
112	Industry	Definitions	3	Market penetration, Market share: With respect to the definitions for both "market penetration" and "market share", it would be helpful to include an acknowledgement of regional specificity to the definitions. At the moment it is not clear that these variables should be defined for a particular region, but that seems important. We note that the definition for "total market size" does include an element of region-specificity.	As per comments in Column D.	Your comment is noted. However, this definition has been deleted from the <i>Plastic Waste Collection Methodology, v1.0</i> since this term is no longer used in the methodology.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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113	Industry	Definitions	3	Region: The definition for "region" is a bit odd. It seems to be driving at the establishment of a region that is relevant for certain elements of the project (e.g., additionality? baseline scenario? etc?), but that context isn't clear in the context of the definition itself.	Simplify the definition for "region" by removing the project-specific context and simply move that contextual information to the relevant section of the body of the methodology.	Your point is noted. The definition of "region" has been revised for clarity and consistency with the definition of "region" in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> .
126	Other	Definitions	3	Managed landfill The definition seems appropriate, although two more criteria could be added: - Has a groundwater monitoring protocol - Has post-closure care requirements While some criteria (e.g. sanitary lining) may be more relevant from an environmental viewpoint than others (e.g. access restrictions), we would argue that a landfill would have to meet all the requirements mentioned in order to be regarded as 'managed'.		Please review the response to comment #68. Revisions have been made to the conditions of an eligible landfill under this methodology keeping in mind that it should not become too burdensome for the project proponent to demonstrate compliance and does not exclude potential/promising projects. Given this we have not concluded your point on ensuring that the landfill has a groundwater monitoring protocol but have revised the requirement on post closure care requirements to allow for different ways of ensuring post closure care such as capping the landfill when it closes.
52	NGO	Monitoring	9	Monitoring parameters PC is ok to provide (subject to clarification as to what is meant by transfer to destination d). EPCW will be difficult and costly to establish and audit - see comments on WG and WC above.	Audit parameters should be set bearing in mind the cost for the project to employ auditors capable of performing the audit. Additionality should be a one-off test set at the validation stage and not require repeat audits.	Your point is noted. In the quantification of plastic waste collected by the project (and the quantification of plastic waste collected at baseline), destination d is meant to represent the entity in the value chain that the collected materials are sold to. This could be the intermediary site that the collected waste is sold to as long as this end destination meets the applicability conditions for appropriate end destinations in the <i>Plastic Waste Collection Methodology, v1.0</i> . We have included an explanation of what destination d represents in the quantification section of the methodology. The section on EPCW has been deleted in the <i>Plastic Waste Collection Methodology, v1.0</i> to avoid placing burden on projects. An applicability condition has been included instead that requires the project proponent to demonstrate that there is plastic waste available in the region and that it would not have been collected in the absence of the project. An applicability condition has also been included for the project proponent to demonstrate that the project activity does not compete with other collection activities or include plastic waste that has been diverted from a historically existing collection activity. As you noted, additionality only needs to be demonstrated at validation. Regulatory surplus needs to be demonstrated at crediting period renewal per Section 3.6.4(1) in the <i>Plastic Standard, v1.0</i> .
106	Service Provider	Monitoring	9.1	Source of data can include external sources for new projects (currently only direct measurement from the project facility)	Clarification	We added "external source(s) of data (e.g., primary surveys, third party literature)" to this row in the table in the <i>Plastic Waste Collection Methodology, v1.0</i> for clarity.
107	Service Provider	Monitoring	9	Question for both methodologies - will projects be required to submit a calibration report (e.g. for weight scales)? This could be quite onerous for projects		Project proponents will not be required to submit a calibration report. However, per the <i>Plastic Waste Collection Methodology, v1.0</i> they will have to demonstrate that they perform maintenance and calibration of monitoring equipment according to current good practice or at least every three years.
30	Service Provider	Monitoring	9.1	Tables	Suggestion to number tables for easier reference	Your comment is noted. The tables have been numbered and headers have been included for each table to make them easy to identify in the <i>Plastic Waste Collection Methodology, v1.0</i> and the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> .
19	Service Provider	Project Boundary	5	Figure 1 and spatial extent of project boundary text (row 3)	The text states "The spatial extent of the project boundary encompasses: - Waste source/collection sites (e.g., households, commercial establishments, landfills, streets);" However, the dotted line of the project boundary in Figure 1 excludes the box "Waste source/collection sites". Can you please clarify if "waste sources / collection sites" are included or excluded from the project boundary.	This figure has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to accurately represent the text and includes the source and end destination in the project boundary. The project boundary diagram has also been revised to no longer include the monitoring points since the location of the monitoring points are likely to vary based on the project. Requirements for monitoring are provided by the applicability conditions (Section 4) and in the monitoring section (Section 9).

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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78	NGO	Project Boundary	Figure 1	Shouldn't "waste source/collection sites" be included in the Project boundary. Of course we're reviewing this from our river interception model where the project starts at the waste source, i.e. the river (although arguably the real sources are upstream where the plastic is mismanaged or where it enters the river).		Yes, the waste source/collection site should be included in the project boundary. Please review the response to comment #19 for a summary of the revisions made to this section. The source in the project boundary should represent the site from where your project collects plastic waste, not where the plastic waste is generated.
90	Service Provider	Project Boundary	5	Mismatch between project boundary in written text and image	Remove 'waste source/collection sites' and 'appropriate end destinations' from project boundary in written text. Can include for reference	Please review the response to comment #19.
91	Service Provider	Project Boundary	5	Image suggests that the two monitoring points have equal value, however one is the primary data point (at the collection facility) and the second is used as a cross-check according to the monitoring parameters - pg. 24/25.	Suggest revising representation of measurement points so that it is clear there is only one primary data collection point for projects.	The project boundary diagram has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> to no longer include the monitoring points since the location of the monitoring points are likely to vary based on the project. Requirements for monitoring are provided by the applicability conditions (Section 4) and in the monitoring section (Section 9). The figure in this section has also been revised to include the source and end destination to ensure consistency with the text.
117	Industry	Project Boundary	5	Line 2 sets out the elements of the project boundary. However, within Figure 1, the dotted line (which presumably represents the project boundary) does not encapsulate some of these.	Modify the diagram, or clarify what the dotted line of Figure 1 represents.	Please review the response to comment #19.
16	Service Provider	Quantification	8.3	Net Plastic Waste	This first sentence is confusing to me. Some additional clarification may be needed.	This section has been deleted in the <i>Plastic Waste Collection Methodology, v1.0</i> to avoid placing burden on projects. An applicability condition has been included instead that requires that the project proponent demonstrate that there is plastic waste available in the region and that it would not have been collected in the absence of the project. An applicability condition has also been included for the project proponent to demonstrate that the project activity does not compete with other collection activities or include plastic waste that has been diverted from a historically existing collection activity.
27	Service Provider	Quantification	8.1	Capacity addition activities	The meth states: "If the existing activity is less than three years old, then at least one year's data shall be used to determine baseline collection." Why is the 1 year data requirement needed for an "activity"? Some flexibility re. this would be very helpful as this rule may delay project start and implementation by almost 1 year. E.g. we are expanding existing collection operations that have been ongoing for less than 3 years, but the scale of the operations have changed over this 3 year period. They have expanded recently, and we aim to expand them further. Based on my reading of the text as written it seems like we would need to halt all planned expansions for 1 year just to collect data. Is that correct? Or how does this 1 yr requirement relate to the next sentence that states "Waste management data may be obtained from historical records of the waste collection system(s) that existed prior to the implementation of the project activity." Can we derive activity data from other sites that have the similar collection activities?	1. As you noted, these requirements for data are only for capacity addition activities. Since there are variations in the amount of waste collected over a year due to various reasons (e.g., season, economic activity, precipitation, business decisions, regulations), a minimum of one year's data is essential to understand and determine the scale of activity for any given project. 2. For projects older than three years, a minimum of data the three year period prior to the start of the project activity is required to account for annual variations in the amount of plastic waste collected over a substantial period of time. These variations are likely to result from larger and more long term effects related to the factors mentioned in the point above. This data is meant to provide a more accurate picture of the scale of activity of a given facility. All these methods are adopted from standard industry practice and sourced from peer reviewed documents. 3. For projects that are less than three years old, one year's data can be used to determine the amount of plastic waste collected in the baseline. The project does not need to halt expansion since it may provide data for any one year from the start date of the operations until the start date of the project activity (i.e., the expansion of operations). 4. For an existing facility, historical records of the collection activity need to be obtained for that facility and nowhere else.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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28	Service Provider	Quantification	8.3	Comment on first sentence	<p>Comment on this sentence: "Net plastic waste collected by the project activity shall not exceed the amount of plastic waste in the region that is not collected or is collected and transferred to an end destination with less environmental benefit than that of the project activity."</p> <p>Sentence may need to be tightened as it can be read to imply that waste plastic must be left in the environment.</p>	Please review the response to comment #16
29	Service Provider	Quantification	8.3	8.3 Second paragraph data requirements	<p>It may be very hard to collect the data needed for this.</p> <p>Why not simplify and state that the collected waste must not exceed the generated waste? Although this may be still be difficult to quantify in areas where governance and infrastructure is poor.</p> <p>More information/guidelines is required around 'surveys'. Primary surveying would likely require ethics approvals which may be difficult to obtain.</p>	Please review the response to comment #16
37	Industry	Quantification	8	<p>There is a lack of data regarding plastic collection rates in remote communities. Searching for data is likely to take considerable time and effort to at most bring back data that is not accurate to the remote project (see next point).</p> <p>The data that is available is generally for major urban centres or at country level, each of which is likely unrepresentative of the actual collection rates and activity of the remote project. A baseline assessment made on this data is likely to be inaccurate and overstated for the remote project.</p> <p>Any relevant baseline assessment calculated (assuming relevant data can be found) is likely to be low in any case and close to zero.</p> <p>If we are to take a proxy approach, it would seem given the data challenges and the likelihood to end up in a low baseline case, to help remote projects by allowing them to assume a default baseline of zero.</p>	Remote projects are allowed to assume a default baseline of zero.	<p>The <i>Plastic Waste Collection Methodology, v1.0</i> provides guidance on how projects shall apply Section 8 to quantify the plastic waste collected at baseline and by the project activity.</p> <p>An automatic baseline of zero is not included for the project activity type mentioned here as any existing collection system would only be eligible to issue credits on the added capacity, as long as the project can demonstrate additionality. This means that a capacity addition project will have to use the amount of waste collected by the existing activity as its baseline collection amount. Only new project activities will be eligible to use a baseline of zero.</p> <p>While we do recognize your point on the lack of data, allowing all projects that are considered to be remote to use a baseline of zero will lead to potential over-crediting since it will not account for existing collection taking place in the baseline. Since only capacity addition projects are required to calculate the baseline amount of plastic waste collected and this amount is based on the activity of their existing system, we see this data as being fairly straightforward to obtain.</p>
49	NGO	Quantification	8.1	re Baseline data: we have only records of what Sea Communities started collating at TPST since September 2018, and this data does not represent all the plastic waste generated from Les village. Many remote communities do not collect data like this.	One year track record is recommended, not 3 years.	<p>Per the requirement for capacity addition activities in Section 8 of the <i>Plastic Waste Collection Methodology, v1.0</i>, if the existing activity is less than three years old, the project may use one year's data to determine the baseline collection amount. In this case, if you can demonstrate that collection by the Sea Communities started less than three years prior to the start date of your project activity, you can use the amount of plastic waste collected in one year as the baseline collection amount.</p> <p>You are only required to determine the amount of plastic waste collected in the region prior to the start of the project. You are not required to include information on the total plastic waste generated in the region in this section.</p>
50	NGO	Quantification	8.2	what is meant by waste having to be transferred to destination d?	waste is sold at site to intermediaries so we won't measure what is being transported to destination d	In the quantification of plastic waste collected by the project (and the quantification of plastic waste collected at baseline), destination <i>d</i> is meant to represent the entity in the value chain that the collected materials are sold to. This could be the intermediary site that the collected waste is sold to as long as this end destination meets the applicability condition on appropriate end destinations in the <i>Plastic Waste Collection Methodology, v1.0</i> . We have included an explanation of what destination <i>d</i> represents in the quantification section of the methodology (Section 8).

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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51	NGO	Quantification	8.3	EPWC definition, namely WG (plastic waste generated) and WC (waste sent to end destinations with better environmental outcomes than the project), will be difficult for remote communities to demonstrate	WG will be hard to capture, since the best source of data will be what the waste management centres report as collected plastic waste; however this inevitably will not capture leakage to the environment and rag and bone trade. WC is just close to impossible for a remote community to find out.	Please review response to comment #16
69	NGO	Quantification	8.1	WRCs do not request to account plastic by type in some projects (Plastic Program Guide, section 2.5, p. 8 L. 13 Where feasible, projects that recover plastic waste should identify the material type(s) managed, but are not required to do so.)	Amount of material type collected (when known) or amount of plastic collected	Collection projects are not required to identify the material collected by type. The equations in Section 8 of the <i>Plastic Waste Collection Methodology, v1.0</i> provide the option to quantify the material managed by type but they may also be used to identify the total material collected by the project activity as long as the material is eligible in the scope of the Plastic Program per section 2.1 of the <i>Plastic Standard, v1.0</i> . We have included an additional sentence in Section 8 to clarify that collection projects that do not identify the material by type can quantify the total additional material collected at baseline/by the project activity.
102	Service Provider	Quantification	8.1	For new project activities: This first sentence could cause confusion - 'historically existing streams' presumably refers to the fact that the waste should already be in existence (i.e. not created for the project), however it reads as though a project could take plastic that would otherwise have gone to another possibly suitable end destination	Rephrase to clarify that this is meant for new projects collecting waste that was not otherwise collected or is collected with an environmentally superior end destination.	This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> so that new project activities will have a baseline of zero. The baseline scenario section will require project proponents to demonstrate that the plastic waste being collected by the project would have remained in the environment, been open burned, incinerated without energy recovery and/or disposed of in an unmanaged landfill prior to project implementation. An applicability condition has also been included that requires that the project proponent demonstrate that there is plastic waste available in the region and that it would not have been collected in the absence of the project. Another applicability condition has been included for the project proponent to demonstrate that the project activity does not compete with other collection activities or include plastic waste that has been diverted from a historically existing collection activity.
103	Service Provider	Quantification	8.1	For new project activities: How is the movement/management defined? Does this mean that they need to provide an overview of how much waste material was collected and what happened to it before their project was set up?	Clarify 'movement/management'	This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> so that new project activities will have a baseline of zero. This text regarding the movement/management of waste has been deleted.
104	Service Provider	Quantification	8.1	For new project activities: Clarify what happens in the case that there was no collection OR it was taken to an unsuitable end destination. Would this result in 0 baseline?	Consider clarification (e.g. distinction between projects that are new and there is no collection and those established where there is some collection already)	Your point is noted. We revised this section in the <i>Plastic Waste Collection Methodology, v1.0</i> to clarify that in the case where there was no collection at baseline or that the collected waste was taken to an end destination that is not considered an appropriate end destination per this methodology, the baseline collection amount would be zero.
105	Service Provider	Quantification	8.3	Have you considered the leakage rate of plastic that is collected but leaks before it reaches its final destination? The Plastic Leak Project provides some %s to calculate the adjusted collection rate (i.e. to include % leaked before collection). This could also relate to baseline calculation.	Consider discount factor for plastic that is collected by leaks into the environment before treatment to calculate baseline and eligible plastic waste in the region	Your point is noted. However, we would like to avoid including a discount factor of this nature since we want to use the amount of plastic waste that is collected and makes it to an appropriate end destination while calculating the amount of plastic waste collected. We do not want to account for the amount of plastic waste that has leaked while calculating the amount of material collected since the leaked material does not make it to an appropriate end destination and cannot be considered as collected waste.
121	Industry	Quantification	8	It is not clear what it means for project proponents to use "real time" data for monitoring purposes.	Please clarify the meaning of "real time" in this context.	The term "real time" has been deleted from the <i>Plastic Waste Collection Methodology, v1.0</i> .
122	Industry	Quantification	8.3	It would be useful to have some context as to the purpose of Section 8.3. At the moment this section comes a bit out of nowhere for the reader without any real context and background as to its purpose.	Please provide additional context and background as to the purpose of Section 8.3 and how it fits with the rest of the methodology.	Please review response to comment #16

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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123	Industry	Quantification	8.4	With respect to Equation 4, in the case of a new collection activity, it may be the case that the project is collecting less plastic waste relative to the total amount collected in the baseline. For example, imagine in the baseline scenario that 100 tonnes of plastic waste is being collected (by other entities), and the project activity collects 50 additional tonnes. In that scenario, it would seem that the result of Equation 4 would be negative (i.e., 50-100). It would seem that net collection by the project is simply equal to the total amount collected by the project, though as confirmed to be additional collection over and above what would have occurred in the baseline. We note that the Plastic Waste Recycling Methodology addresses this by directly accounting for the volume of plastic that would have been recycled in the baseline already (and defaulting that value to 0 for new recycling activities), but that same formula doesn't appear to exist in this methodology.	Please clarify the expected operation of Equation 4.	Your point is noted. This section has been revised in the <i>Plastic Waste Collection Methodology, v1.0</i> so that new project activities have to use a baseline of zero. This will help address the concern you raised and ensure that the amount of plastic waste collected by a new project will always be greater than the baseline collection amount.
53	NGO		0	Our gravest concern is that the validation and monitoring benchmarks are incapable of being performed by remote communities. Additionality should not be an IRR test - a simple cash flow model should suffice. The project cannot certify the downstream use of recycled plastic waste. Nor should the applicability criteria be restricted to new or additional capacity. Existing collection capacity should also qualify for credits since (i) if the community is rewarded for the waste it is collected, only then will they be motivated to invest in improved and additional collection resource and (ii) it will be operationally difficult to draw the line between existing and new collection routes.	Simplify the positive list to include (i) communities identified by the appropriate income levels to exclude the wealthy nations (ii) coastal or waterway communities whose local waste centres currently do not collect plastic waste separately from general waste.	Please review the response to comment #38. The investment analysis test is fairly straightforward, where the project proponent can select a financial indicator and a benchmark per the guidance provided in the <i>Plastic Waste Collection Methodology, v1.0</i> . Project proponents are only required to demonstrate that the collected plastic waste is sent to an end destination that is considered to be an appropriate end destination in the <i>Plastic Waste Collection Methodology, v1.0</i> . They are not required to certify the downstream use of the collected plastic waste beyond this. The Plastic Program aims to direct finance towards additional plastic waste collection and recycling activities, making it so that projects with existing collection capacity cannot qualify for credits. As long as the project proponent can demonstrate the activities (or lack thereof) that were taking place at baseline and the fact that the project needs additional financing to be able to start or scale up, the project should be able to demonstrate additionality.
70	NGO		0	Overriding concern: aren't the rules too complex to establish a plastic crediting mechanism as a novel instrument? The draft rules mirror to a large extent the quite mature CDM/VER market which has been developed over the last 15-20 years. Should we already try to cover all eventualities now or would it be more conducive for a new instrument to go back to basics a bit? Of course, we appreciate and fully support the wish to prevent misuse of the crediting system.		We conducted stakeholder and expert consultation to understand the potential barriers the methodology requirements could cause for projects. In most cases, we found that the data required by the methodology is already typically collected in the development of such activities or projects. Our work with pilot projects and their draft project descriptions also showed us that there is a fair amount of understanding of the rules and criteria included in the methodologies. It is therefore deemed appropriate to retain the current framework developed based broadly on the CDM/VER guidelines and also on typical practices in the waste management sector.
124	Industry		0	Throughout the methodology, the unit of weight used for plastics is 'tonnes'. However, the Plastic Waste Reduction Standard notes that the unit of measure shall be kilograms for plastic material (and subsequent credits).	Ensure consistency between the methodology and the Plastic Waste Reduction Standard in terms of unit of weight.	The <i>Plastic Standard, v1.0</i> has been revised to use metric tonnes as the unit of weight for the Plastic Program (including for Plastic Credits). You will see these revisions in the final version of the <i>Plastic Standard, v1.0</i> and other documents that will be released with the launch of the Plastic Program.
125	Industry		0	It would be useful to have a list of eligible plastics that could be recycled under this methodology, or to include a reference to the Plastic Waste Reduction Standard for that same list.	As per comments in column D.	All projects will be required to reference the <i>Plastic Standard, v1.0</i> alongside the methodology. The <i>Project Description Template, v1.0</i> that projects will be filling out with details on their activity(ies) will require that the <i>Plastic Standard, v1.0</i> is used as a reference for all the materials that are eligible under the scope of the Plastic Waste Reduction Program.

Comments Received During the 7 October - 8 November 2020 Public Consultation on the *Plastic Waste Collection Methodology*: Verra Responses 10 February 2021

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38	Industry		0	<p>The Draft Methodologies do not address "Remote Projects". Remote Projects are similar to "Rural Projects" in that they have low population density, i.e. are small. However Remote Projects need to be distinguished from Rural Projects in that they are a significant distance from urban areas, and or separated by sea (i.e. islands), and or are coastal projects where significant plastic waste from other territories washes ashore.</p> <p>We therefore propose a new positive list criteria for the Collection Methodology which is "Remote Location" and a new project category for the Recycling Methodology which is "Remote Project".</p> <p>Remote recycling projects are very necessary for the success of the plastic credit system, but will be unfairly and significantly disadvantaged if treated the same as Urban or Rural projects. Remote recycling projects have profoundly different economics than do Urban or Rural projects, whereby they proportionately have additional cost and reduced revenues that typically make them very uninvestable. Additionally, access to accurate baseline data that supports Remote recycling project certification is severely limited compared to Urban or Rural projects, which has the effect of reducing the credit inventory that should rightly be available to them, making them even more uninvestable. Finally, communities that are attached to Remote recycling projects are by default the most vulnerable communities in the world and far more socially affected by the impact of plastic pollution. Therefore far more in need of the benefits of credits. On this basis, Remote recycling projects need to be dealt with differently compared to Urban or Rural projects.</p> <p>1. Remote Project's Different Economics Remote project economics are profoundly different to Urban or Rural projects, which applies to both Remote projects in undeveloped countries and developed countries, albeit with some subtle differences as noted as below.</p> <p>a. Remote projects are typically in distant locations from urban areas or separated by sea, i.e. islands, indigenous, etc, which gives rise to no or minimal access to local recycling markets for the sale of recycled plastic. If there are local recycling markets they are usually facilitated by "middlemen" who offer prices vastly lower than that found in urban recycling markets. This usually results in Remote projects having to freight their recycled material to urban recycling markets and in so doing incur substantial</p>	<p>We therefore propose a new positive list criteria for the Collection Methodology which is "Remote Location"</p> <p>We propose the definition of remote consider project locations that are: a significant distance from urban areas, and or separated by sea (i.e. islands), and or are coastal projects where significant plastic waste from other territories washes ashore.</p>	<p>The positive list in the additionality section of the <i>Plastic Waste Collection Methodology, v1.0</i> will ensure that projects that are located in countries that are relatively less economically developed will be deemed automatically additional. While we recognize that projects located in remote areas face unique challenges, we would like to avoid deeming projects in remote locations in middle or high income countries automatically additional to preserve the integrity of the additionality test. Such projects can either use the activity penetration rate test or the investment analysis test to demonstrate additionality, where the latter should be fairly easy to use to demonstrate additionality given the unique barriers and challenges such projects face.</p> <p>Future versions of the methodology may consider further categorizations including the categorization mentioned in your comment, based on more detailed and extensive feedback from project participants and other relevant stakeholders.</p>

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				<p>additional freight costs that otherwise are not incurred by Urban or Rural urban recyclers.</p> <p>The viability of Remote projects is worsened by the small volumes of material they typically process, which is excessively expensive to freight in small batches.</p> <p>Conversely if material is stockpiled over a long period of time in order to fill a container before freighting and achieve some degree of cost efficiency, the Remote project will be impacted by cash flow problems as payments for their recycled material are only made when material is shipped.</p> <p>The remote location of Remote projects further impacts their cost base as travel and transport for training and education programs, equipment delivery technical support and project auditing are significant when applied to their often modest P&L's.</p> <p>b. Remote recycling projects do not benefit from economies of scale, as do Urban or Rural projects, which adversely affects their viability. This predominantly manifests itself in disproportionately high capital equipment and labour costs.</p> <p>As Remote recycling projects have been historically uninvestable, no market has been created for the development and sale of plastic recycling processing equipment that is downscaled for the lower volumes of Remote projects. This means that Remote projects are forced to purchase expensive processing equipment built for Urban or Rural projects that have excessive capacity. This puts a significant and disproportionate cost burden on the Remote project's P&L.</p> <p>Usually Remote projects choose to not to purchase equipment at all and instead process by hand with additional labour. But this pathway results in disproportionate labour costs and results in recycled material being processed at a lower level of quality, which attracts lower prices per kilogram when sold. This has a double and significant effect on Remote project's P&L from additional labour costs and lower price per kilogram..</p> <p>It is also worth noting that the above labor cost impact is exacerbated in Remote projects in developed countries where the minimum wage threshold can be upwards of ten times that in undeveloped countries.</p>		

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				<p>c. Remote projects have reduced revenue potential due to inefficiencies of smaller volumes of recycled material they typically process. This manifests itself due to the typical minimum order requirements and the technical specifications that plastic moulders stipulate when purchasing recycling plastic material.</p> <p>Typical minimum order requirements for a single batch run of a plastic product can be in the region of 10 - 100 tonnes of input material, which is required in a single delivery. These minimum order requirements are typically well beyond the capacity of a Remote project, which means Remote projects are not an attractive supply source for recycled plastic material. Consequently, Remote projects are forced to sell the recycled material to middle men aggregators, who take a disproportionate share of the margin, thereby reducing Remote projects revenue potential compared to Urban or Rural projects. This situation creates a paradox in plastic recycling whereby higher volumes of plastic material supply results in higher prices per kilogram, but unfortunately this paradox can only be enjoyed by Urban or Rural projects.</p> <p>This price problem is made worse as Remote projects are less able to process material in increasingly precise specifications due to their processing equipment limitations. Today, compounders are looking for very accurate material segregation which can be achieved using advanced infrared and artificial intelligence sorting equipment. Regrettably, these technologies and the higher prices they bring, are simply not available to Remote projects.</p> <p>2. Remote Project's Lack Baseline Data Access to accurate data that supports Remote recycling project's certification, in particular it's additionality and baseline calculations, is severely limited compared to Urban or Rural projects which operate in data rich urban areas. This will result in Remote projects being forced to adopt urban or national data that almost always have higher rates of collection and recycling. Relying on urban or national data will have the effect of over exaggerating collection and recycling rates for Remote projects and therefore creating a higher baseline and reducing their true credit inventory.</p> <p>If you take Plastic Collective's Mantanani Island project in Malaysia, when we started the recycling project there 18 months ago, there was no waste management, leaving business and households to dispose of their waste, including all plastic waste, by burning, burying or dumping. This resulted in near 100% mismanagement and high leakage of plastic waste into</p>		

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				<p>the environment. In our attempts to baseline the project using published data from What a Waste Global Data there is no data available at local levels in Malaysia (other than Kuala Lumpur), let alone specifically Mantanani Island. The data available for Malaysia nationally indicates collection rates of 26.1% and recycling rates of 17.5%. This clearly and unfairly misstates the baseline for this project in Mantanani Island, Malaysia, which is near 0%.</p> <p>Similar baseline misstatement applies to all of our other Remote projects in, Bali Indonesia, Normanton and Bourke Town in the Gulf of Carpentaria, Bowraville in NSW Australia, Whitsundays Island, Australia.</p> <p>3. Social Impact of Plastic Pollution on Remote Communities It is vitally important that the plastic credit mechanism does not systematically disadvantage Remote recycling projects. Remote recycling projects are typically associated with Remote communities and remote locations. It is these communities that are already disproportionately impacted by plastic waste. For example, plastic waste litters their immediate environments, burning of plastic waste creates disease, their waterways are polluted, travel industries are affected, while island and coastal communities have a relentless plastic washing ashore. Plastic credits promises to make a profound and proportionately greater impact on Remote communities, but only if the plastic credit system addresses their unique circumstances.</p>		