

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
50	NGO	1	Definition of Recovery	<p>We are concerned with the definition of Recovery currently being used: "The successful diversion of plastic materials out of the environment to landfill disposal or recycling, collection and reuse systems. These activities can include controlled/regulated incineration with energy capture."</p> <p>The EMF global commitment common vision says "All plastic packaging is reused, recycled, or composted in practice. Landfill, incineration, and waste-to-energy are not part of the circular economy target state." Landfill or controlled/regulated incineration with energy capture should not be considered a legitimate end point for waste recovered within the Standard, but only plastic packaging that is reused, recycled or composted.</p>	<p>The use of landfills and controlled waste-to-energy are superior end-of-life states for waste plastic than plastic in the environment and open burning. While the goal of the Program is to ensure the circularity of plastic, landfills and waste-to-energy provide a realistic and feasible option for projects to use to get off the ground and improve the management of waste plastic. The parameters for the type of landfill that can be used and the pollution control measures in waste-to-energy plants will be defined by the Program.</p>
51	Service Provider	1	To clearly define "a plastic unit" or "plastic credit" !! Currently definition of a Plastic Waste is not clear or can have better presentation	<p>We believe that the standard should clearly define "a plastic unit" or "plastic credit". The standard does not specify on this definition with clear picture even though the later section of the standard mentions that "Kilograms shall be used as the unit of measure".</p> <p>But it's still not clear if this unit "kg" relates to both recovered and recycled plastic quantity which must be in the form of solid output to measure in equivalent "kg" or it relates to only the recovered plastic in "kg" which will go as input quantity in case of recycling process and hence Plastic Unit will be based on this recovered quantity only?</p> <p>A clear definition will help understanding the quantification process and crediting process for projects. Suggestion: a "Plastic Unit" must be defined as: (i) For "Recovery activity" - "1 Kg of waste plastic (all types as approved) that has been recovered irrespective of that is recycled or not"; (ii) For only "Recycling Activity" - "1 Kg of waste plastic (all types as approved) that has been processed for recycling. It also means that Plastic Unit is the quantification of waste plastic that would have been left unattended or unrecovered or non-recycled in absence of the project activity.</p>	<p>See response to Comment #49.</p>
68	NGO	1	Fundamentally, plastic recovery and plastic recycling need to be seen independently as 2 different things. Also all plastics are not equal in the world of recycling, and unrecyclable plastics (the majority) should not be missed.		<p>Recovery and recycling are defined as independent terms and concepts in the Program. The difference in the nature of the activities will be reflected by the credits since projects will be able to issue Waste Recovery Credits and/or Recycling Credits based on the nature of the activity performed.</p> <p>Low-value/hard to recycle plastics are within the scope of the Program, as listed out in section 2.1 of the <i>Standard</i>.</p>
77	NGO	1	Purpose Statement	<p>I think a purpose statement is missing here - why do we need this standard? What outcome do we want it's application to ultimately result in?</p>	<p>The Program objective will be outlined in the <i>Program Guide</i> which is the overarching program document, providing the rules and requirements governing the <i>Plastic Accounting Program</i> and further describing the constituent parts of the program. The Program objective section will elaborate on the overarching objective of the Program - to support and scale-up activities that increase plastic waste recycling and/or recovery from the environment.</p> <p>The <i>Program Guide</i> will be part of the second public consultation.</p>
78	Service Provider	1	Minor editorial comment on paragraph on using the standard for accounting only "The Plastic Standard can also be used by plastic waste recovery and/or recycling projects that intend only on accounting for the results of their recovery and/or recycling activities, and are not interested in issuing plastic recovery units or plastic recycling units (plastic units). Projects using the Plastic Standard solely for accounting purposes are not eligible to issue plastic units. Therefore, requirements pertaining to the issuance of plastic units and eligibility requirements for crediting are not applicable to such projects and are noted as such."	<p>In the paragraph on using the standard for accounting purposes only, I feel that the chain of reasoning should be the other way around. For easier understanding I would propose the following minor restructuring: "The Plastic Standard can also ... or plastic recycling units (plastic units). In that case requirements pertaining to the issuance of plastic units and eligibility requirements for crediting are not applicable and are noted as such. Consequently, projects using the Plastic Standard solely for accounting purposes are not eligible to issue plastic units."</p>	<p>Thank you for this suggested revision. The paragraph referenced will be revised for clarity.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
82	Industry	1	<p>plastic emission / CO2 emission: draw the comparison while introducing the Plastic Standard</p> <p>Is it fair to assume, that down the road the Plastic Standard will go in a similar direction as of today the "CO2 emission certificates", which allow for supporting not only a common way of counting (which is important to have) but also a political means to steer the creation of plastic waste? So that globally plastic waste will get a price tag when created AND those who recycle can benefit, because they help the world.</p>	<p>And in that sense I would believe that an analogy would help in this first chapter (which is sort of a preamble to me) for a common understanding and cross referencing. "Plastic Standard is like 'CO2 emission certificates' only that x and y are different" is mentally a very good starting point. And this would help us (Aventurin Waste, starting a recycling activity for plastic waste in the Senegal) to eventually get our social business (according Muhammad Yunus) more easily sustainable from all perspectives, ecological/social AND financial.</p>	<p>After an entity has done what it is able to as part of its direct footprint and value chain, it can use carbon credits to "offset" that which remains of its GHG footprint. As you point out, this system is very analogous to the way that we hope that credits certified under that <i>Plastic Standard</i> will be used. Plastic Accounting Program communications materials will refer to this analogy as appropriate.</p>
83	Service Provider	1		<p>A simplistic overview of all standards in the form of a "check-box" table might help clarification</p>	<p>Verra will consider creating an overview of the requirements of the <i>Standard</i> once the Program is launched in 2021.</p>
85	Service Provider	1	<p>The Plastic Standard is a welcome framework to provide consistency, transparency and traceability in plastic waste accounting from plastic recovery and recycling activities.</p>		<p>N/A</p>
86	Service Provider	1	<p>Standard will meets the needs of several relevant stakeholders, including recycling projects and corporates looking to purchase credits. Care should be taken to ensure that the Standard supports the development of a wide range of recycling and recovery project scales and types.</p>		<p>Verra recognizes the need to ensure that the <i>Standard</i> and the Plastic Accounting Program support the development of a wide range of recycling and recovery project scales and types. The <i>Standard</i> has been written to accommodate different types and scales of projects, with requirements that can be met as per the relevance and feasibility for different projects. The methodologies approved under the Program will ensure that different project types have defined pathways to follow in their development and that requirements specific to each activity type are included.</p>
88	Industry	1	<p>Can we start referring to Packaging recovery and recycling accounting standard?</p>		<p>We are revisiting the name of the Program, and we've noted your suggestion. One consideration we have in naming is to represent its main focus. While the Program focuses on getting <i>plastic</i> packaging and products out of the environment and back into the economy, we feel that any program name without "plastic" in it would be too broad.</p>
89	Industry	1	<p>Please inform the timeline for the additional documents to be ready and what are the links between the standard and these documents. Are all 3 documents ready?</p>		<p>All documents cited as "to be developed" are currently under development and will be part of the Plastic Accounting Program launch in 2021. The purpose of each document in the Program is explained in the Introduction. All the documents supplement the requirements listed out in the <i>Standard</i>, describing rules and requirements for aspects of the Program that are not addressed in the <i>Standard</i>.</p>
90	Industry	1	<p>Would like to elaborate more with the other members about the accounting system. We would like also to know about the position/benefits for converters to report against neutrality.</p>		<p>Verra is with the 3R Initiative and other partners to develop guidelines for corporates that set out a "mitigation hierarchy": a sequence of steps to be taken prior to engaging in mitigation efforts. At a high level, the steps are as follow: (1) direct action (reducing plastic content, implementing reuse models), (2) value chain actions (sourcing more recycled content to stimulate collection), and finally (3) engaging in mitigation efforts (via extended producer responsibility schemes, producer responsibility organizations and plastic credits).</p> <p>The guidelines for corporates will set out plastic waste reduction-related claims such as "net zero plastic waste to nature", "net zero plastic waste" and "net plastic neutral". We recognize the importance of such claims and will work to get them endorsed by the widest possible group.</p>
91	Industry	1	<p>Appendix 2 lists the members of PSDC and not the members of the 3RI. It looks like members of the PSDC are 3RI members. We recommend to involve more 3RI members in all the checkpoints of the standard.</p>		<p>There are some 3RI members that also participate in the PSDC. However, not all 3RI members participate in the PSDC. V1.0 of the <i>Plastic Standard</i> will acknowledge the 3RI and the PSDC as bodies, but will not list specific members. The roles of Verra, the PSDC and the Steering Committee (3RI members) are outlined on the Governance and Development page of the Plastic Accounting Program website: https://verra.org/project/plastic-accounting-program/governance-and-development/</p>
97	NGO	1	<p>There needs to be a mechanism to encourage the recovery of low value, unrecyclable plastics too as these tend to make up the majority of plastics which don't get picked up by the informal sector and remain in the environment as a result.</p>		<p>See response to Comment #95.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
180	NGO	1	<p>How the plastic standard links with the crediting mechanism</p> <p>We recognise that this consultation is focused specifically on the plastic standard, and we note there are far less details available publicly on the corporate standard and crediting mechanism. However, we believe the introduction to this particular element should present the Plastic Standard within context of the broader initiative. The fundamental importance of the reduction of single-use plastic should be stated. The primary focus of any company or initiative wanting to address their plastic footprint should be on reducing the overall use of single-use plastic. Recovery and recycling of plastic waste should be approached as a strategy in the transition to significant reduction in single-use plastic, and as a mechanism to tackle the huge amounts of plastic already in the environment. With this in mind, we are concerned that the crediting mechanism linked to this Plastic Standard risks undermining a focus on reduction, and the responsibility of companies in this regard.</p>	<p>Can you please provide more information on the Crediting Mechanism and how you envisage companies using it to address their plastic footprints?</p>	<p>As part of the 3R Initiative, Verra is working with partners to develop guidelines for corporates that set out a "mitigation hierarchy": a sequence of steps to be taken prior to engaging in mitigation efforts. At a high level, the steps are as follow: (1) direct action (reducing plastic content, implementing reuse models), (2) value chain actions (sourcing more recycled content to stimulate collection), and finally (3) engaging in mitigation efforts (via extended producer responsibility schemes, producer responsibility organizations and plastic credits).</p> <p>The guidelines for corporates will set out plastic waste reduction-related claims such as "net zero plastic waste to nature", "net zero plastic waste" and "net plastic neutral". We recognize the importance of such claims and will work to get them endorsed by the widest possible group.</p>
183	Industry	1	<p>Participation</p>	<p>Could consider requirements around participation such as a goal around plastic reduction and total use to preclude companies from considering the purchase of plastic credits as an end result.</p>	<p>We will consider such a requirement in future versions of the <i>Standard</i>. At present, it is too high of a barrier to credit purchases.</p> <p>As part of the 3R Initiative, Verra is working with partners to develop guidelines for corporates that will provide best practices for transparency in corporate reporting around direct and value chain actions and mitigation efforts.</p>
213	NGO	1	<p>Greater emphasis on social and environmental impacts needed</p>	<p>We note Section 3.13 - Safeguards, that projects must identify and take steps to mitigate negative social and environmental impacts. However we feel that the social and environmental impacts should be far more 'up front' and mainstreamed throughout all aspects of the Standard. Rather than only mitigating negative impacts, the Plastic Standard is an opportunity to mainstream and replicate best practice in promoting positive social and environment impacts.</p> <p>A key mechanism to ensuring this is engaging and involving the informal waste sector a key stakeholder. As an example, a project requirement could be supporting the organisation, representative and entrepreneurship of informal waste workers, in cooperatives, associations or community based organisations.</p>	<p>Verra recognizes the value of projects with positive environmental and social impacts. However, to accommodate for small-scale projects and ensure that they are not unfairly burdened or excluded, the <i>Standard</i> currently has "do no harm" level safeguard requirements. The requirements are under re-evaluation to ensure that they are appropriately rigorous and stringent. The <i>Standard</i> will include a statement encouraging projects to report social and environmental outcomes beyond what is required by the Safeguards and provide examples of such impacts. Verra will also provide support for projects to use other standards, such as the Sustainable Development Verified Impact Standard, to demonstrate positive impacts once the Program is launched.</p>
221	NGO	1	<p>I think more safeguards need to be put in place to protect vulnerable waste pickers / not encourage the industry as is</p>		<p>The safeguard requirements are under revision to ensure that they are appropriately rigorous and stringent. However, to accommodate for small-scale projects and ensure that they are not unfairly burdened or excluded, the <i>Standard</i> will continue to have "do no harm" level safeguard requirements.</p> <p>The <i>Standard</i> will include a statement encouraging project proponents to report social and environmental outcomes beyond what is required by the Safeguards and provide examples of such impacts. Verra will also provide support for projects to use other standards, such as the Sustainable Development Verified Impact Standard, to demonstrate positive impacts once the Program is launched. The safeguard requirements and the ability to report positive impacts will ensure that projects contribute to improvement in the informal waste management system.</p> <p>The <i>Standard</i> will require project proponents to undertake a local stakeholder consultation. In this process the project proponent will need to identify stakeholders, engage them prior to validation and provide them with a channel to raise concerns about potential negative impacts. The negative impacts on vulnerable waste pickers will be avoided through their involvement in project design and planning of how to mitigate any job loss that might occur.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
227	Service Provider	1		The standard mentions about "Waste Sorting" but it is not clear how waste sorting will be eligible under this scope of this standard. Because in all sections of the standard it has been emphasized that "recovery" and "recycling" will be eligible for "plastic unit" claim which will be based on certain quantification process. Here, sorting waste may not necessarily lead to recovery and recycling over and above the baseline scenario.	Waste sorting activities are included in the scope of the Program as an eligible activity that can result in the issuance of credits. Waste sorting will be considered additional if the activity serves as the point of intervention that enables increased or new plastic waste recovery or recycling. The <i>Standard</i> will be revised to clarify this. The potential of waste sorting activities to demonstrate additionality and issue credits will be further explained in the methodologies, as relevant to different project activities.
228	Service Provider	1	Broadening language	The standard would benefit from broadening the language from 'plastic' to 'plastic and product packaging' to include other composite materials such as aluminum foil lined sachets and pouches, beverage cartons, etc. It is not clear from the current description whether or not these are included. e.g., The Recovery and Recycling Project Accounting Standard (Plastic and product packaging Standard) provides a global standard for product packaging and plastic waste recovery and recycling solutions.	Verra acknowledges the need to broaden the language to reflect that composite materials containing plastic (per the parameters that will be defined in the Scope) are also included in the Scope of the Program. However, the Scope is not limited to product packaging and includes other composite materials and products containing plastic. Verra will consider broadening the language to reflect the same.
234	Industry	1	The introduction needs an explanation of the scope with respect to materials and geography covered within the standard		A sentence will be included in the Introduction section of v0.2 of the <i>Standard</i> to explain the geographic and material scope of the <i>Standard</i> .
87	Industry	1	Can we revisit the naming of the standard and look at a change to plastic PACKAGING AND PRODUCT standard?		We are revisiting the name of the Program, and we've noted your suggestion. One consideration we have in naming is to represent what its main focus is, and the Program definitely focuses on getting plastic packaging and products out of the environment and back into the economy.
94	Service Provider	1	treat different plastic differently	The Standard assume equivalent value for all kind of plastic in the plastic waste management value chain. It is necessary to define different weightage to different kind of plastic based on the current scenarios.	Verra acknowledges the value of assigning different values to plastics by polymer type to incentivize the recovery of traditionally unrecyclable and/or hard to recover plastics. Given the significant amount of time and research required to develop an impact equivalency tool to assign increased value to low-value plastics, Verra is aiming to include this in a future version of the <i>Standard</i> . Currently the Program accounts for all plastic types in an equal manner. Recovery projects will have the option to report on the plastic types if feasible, given the low feasibility of material sorting and identification in certain cases. Recycling projects will be required to identify material managed by the plastic types listed out in the Scope of the <i>Standard</i> . The serial numbers associated with each credit will represent the plastic type(s) managed by the project if the project provides this information. With information on the plastic type(s) managed being reflected in the serial number of the credits, credit buyers will be able to purchase credits from projects that manage plastic types that they are unable to manage in their value chains (a majority of which tends to be low-value plastics). Based on Verra's experience, the value of the credits from projects will be determined by the market demand for projects managing certain types of plastic over others, i.e. credits from projects managing low-value plastic will have a high value.
98	Industry	1	In some parts the standard talks about credits and in other parts about units. The concepts need to be clearer.		We recognize that the way credits/units are currently referred to is confusing. We have also renamed the credits. Verra will revise all instances of credits/units for clarity and consistency, and to reflect the new terminology.
226	Industry	1	Need to ensure that the Standard account for ALL recycling	The Standard seems to openly target mechanical recycling. Chemical recycling is in development and will complement efforts to increase recycling and create high-quality recycled content. It would be key to ensure that the Standard creates a level-playing field for various recycling methods.	While not explicitly stated, chemical recycling is an eligible recycling activity under the Program. This will be made more explicit in the definition of recycling in the <i>Program Definitions</i> document.
70	Industry	1.1	Process to make changes to the document must be established		The process for Program updates will be provided in the <i>Plastic Accounting Program Guide</i> .

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
80	Service Provider	1.2	interpretation/definition of words like "shall", "should", "can", "may", etc.	For non-native English speakers it is beneficial to define and clearly interpret the meaning of the words "shall", "should", "can", "may" and alike, which are used throughout the standard. This will help avoiding misunderstandings.	This is an important point. Verra will include an explanation of the terms used so that readers understand the difference between requirements and suggestions or permitted actions/activities.
266	Other	1.2	Translation into other languages, so all relevant stakeholders can fully understand it	<p>Since English is not vastly spoken in all countries, there should be a second official Language. In LATAM the most common language is Spanish, and as a developing region it still produces a vast amount of waste that doesn't get recycled. here is a lot of potential from Spanish-speaking recycling initiatives, and translating the Standard into that language would make sure the guidelines are fully understood by everyone there.</p> <p>Regarding the Public Comment Period, it may be difficult to participate for non-English speaking countries or places where there's a lack of internet access. With that in mind, Verra could be losing the opportunity to take on the opinion of some of the most vulnerable stakeholders.</p>	<p>The language of the first version 1 of the Plastic Accounting Program will be English. Verra will consider translating selected documents into relevant languages once all documents have been developed and launched in 2021. In the case that translated documents are developed, project documentation would likely still be required to be submit in English.</p> <p>Project proponents (PPs) are required to engage with all stakeholders throughout the life of the project. Auditors will check that PPs are in conformance with requirement during each site visit, ensuring that stakeholders have been engaged directly or through their legitimate representatives.</p>
267	Service Provider	1.2		What is the rationale behind a project proponent's obligation to develop a PD and MR in their local language? Can this not be optional?	It is not required that projects develop project descriptions and monitoring reports in their local language. It is required that project proponents develop <u>at least a summary</u> of the project description and monitoring report in a relevant local or regional language if the project is located in a country for which English is not a widely used language among project stakeholders. Stakeholder consultation is an important component of project development and implementation. For project stakeholders to participate effectively in consultation they need to be able to read at least a summary of the project.
103	Service Provider	2	Applicability related to "Only Accounting" and "Plastic Units" w.r.t. different methodology and tools to be used.	A generic understanding from the standard is that suitable methodology (to be developed by VERRA) will be applied to develop projects that intend to issue "Plastic Units". So what about the practice for only accounting? Does accounting also need to follow the same methodology or can it refer to any other practices in line with the standard or will there be separate methodology for accounting and crediting? This clarity is suggested as it will help project developers understanding and applying projects suitably.	<p>Projects/entities using the <i>Standard</i> only for accounting purposes and not to issue credits must also use an approved methodology under the Program. By using the same methodology, different projects of the same type can account for their impact consistently and in a comparable manner. Projects using the Program only for accounting purposes do not have to follow all of the requirements of the <i>Standard</i>. For example, additionality does not have to be demonstrated and that section of the methodology would not apply to the project.</p> <p>Where existing methodologies or parts of a methodology do not apply to a project, methodology deviations within certain parameters can be applied or a new methodology can be developed.</p>
43	Service Provider	2.1	Provide a general definition of plastic (preferably with reference to an ISO Standard). E.g. ISO/TR 21960:2020		A definition of plastic based on a commonly accepted reference (e.g., ISO and/or the New Plastics Economy Global Commitment definitions) will be added in the <i>Program Definitions</i> document.
60	Service Provider	2.1	definition	Include definition of "reuse" and "reduction". Especially "reuse" against "recycling" is very confusing.	The definitions of reuse and reduce will be included in the <i>Program Definitions</i> document.
124	Service Provider	2.1	SPI code doesn't reflect modern plastic demand. Suggestion for increased granularity on plastic type label: SPI code + base polymer code from UNSPSC designation + UNSPSC commodity code	<p>Examples instead of grouping bottles and buckets as: HDPE #2 it would be: HDPE #2-13102017-24122002 (A plain english version would be "#2 HDPE bottles") HDPE #2-13102017-47121804 (plain english version would be "#2 HDPE buckets")</p>	Verra will make revisions to the Scope (Section 2.1) of the <i>Standard</i> v0.2 drawing input from the suggestions provided. Verra sees the value in ensuring that the Scope reflects the current needs of the market and will revise the Scope to allow for increased specificity in the identification of recovered and recycled materials.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
124a	NGO	2.1	<p>It makes sense that increasing the granularity and specificity in the material code would help the buyers of the recycled materials with their purchasing decisions. Your concrete recommendations of an alternative material labeling scheme is helpful. Your comment generated the following questions to which we would be grateful for your response.</p> <ol style="list-style-type: none"> 1. Would the code system you propose be more relevant for materials that are recovered solely for recycling? Recovered materials that are not suitable for recycling will likely have improved landfilling or controlled incineration as their "end of life" outcome. 2. Do you see small-scale waste management operations and informally organized waste picker communities as having the resources/requisite knowledge to classify materials using this code? 3. Would the same code system be applicable for materials recovered/recycled in both emerging and developed economies? 4. Is there a higher assurance of material quality with the use of a code of this nature as opposed to simply having labels with one of the seven plastic types or the type of packaging? 5. Would it be reasonable to require that the second and third parts of the label codes are provided only if the activities/projects have access to this information? 		See response to Comment #124.
124b	Service Provider	2.1	<p>1. I believe we need a better code system to meet market demands - for recycling or otherwise. On the recycling side, the more detail the more valuable - as we are trying to meet a specific design specification. On the biological reutilization side, we also have multiple pathways that can be optimized - if a material is identified as compostable, degradable or composite - and to what standard - is important and will also determine market value. A more accurate material code will tell you its pathway options</p>		See response to Comment #124.
124c	Service Provider	2.1	<p>The suggestion to use NAME # SPI_code - UNSPSC MATERIAL - UNSPSC COMMODITY may be achievable for industrial projects but probably not for projects in the developing world where requirements from offtakers dictate the classification. Common practice in developing countries is not to segregate the packaging & plastic waste by the RIC 7 types, but by e.g., rigidity and type of packaging like bottles (coloured/non-coloured), bags, bottle caps, cups, foil-lined sachets, textile etc.</p>		See response to Comment #124.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
124d	Service Provider	2.1	<p>2. With a simple mobile app for waste pickers we can leap from the fine detail of a product or package up to a generalized code as I propose. Groups like Gringgo are even using AI on photos of crushed plastic discards to do things like this. In my experience some simple supply chain research (from knowing a package and where it was found) can yield a supply chain all the way to polymer stock numbers. The codes themselves can live in the back end, the pickers just know that they got paid for PET water bottles.</p> <p>We are intuitively starting with very detailed information at collection - pickers are paid for how many kg of PET water bottles they are delivering for example. If I log that into my app to generate a mobile payment to the picker, I have those codes built-in from the first transaction. The codes themselves can live in the back end, the pickers just know that they got paid for PET water bottles. The difference is we are not consciously omitting all that valuable info into an abstract single digit classification and instead are just describing what it is.</p>		See response to Comment #124.
124e	Service Provider	2.1	3. Yes we should have a single universal code, just like SPI's 1-7, but modernized with more information. As per the code I recommend, the first digit can still be 1-7, its just that we can add more specificity with more following digits.		See response to Comment #124.
124f	Service Provider	2.1	4. Material quality can reflect consistency, purity, or how well it meets a performance spec. Labelling at a higher granularity will tend to separate at a higher level and so should provide much more consistency. The ability to meet a performance spec will be much more a reflection of the chosen material, but the consistency will allow a production manager to compound additives with much greater control. However purity is a much different issue. I have found that recycled polymers should be tested for ash/residue content and modifiers (like fillers). ASTM D5630-13 and ASTM E1131-08 seem to be the best to work with. When combined, these tests give fantastic optics on purity and that has a massive impact on supply chain's willingness to use these recycled materials in their equipment. Perhaps this standard should also specify a "purity index" - not as a requirement but as a reference point for where the circular economy is pulling us.		See response to Comment #124.
125	Other	2.1	STYROFOAM is a registered trademark and should not be used as a term in this standard	Replace "styrofoam" with "polystyrene foam" in every instance in the standard	"Styrofoam" will be replaced with "polystyrene foam" in v0.2 of the <i>Standard</i> .
126	Service Provider	2.1	The other type (7) of plastics need to be sub categorize and include for the plastic accounting system, as it is also very important if we go for the recycling. They are as ABS, polycarbonates,Acrylic (PMMA- Polymathic methacrylate), and PA (Poly amide) Nylons which are also heavily used in Electronics and electrical equipments in today's developed world.		The Scope (Section 2.1) of v0.2 the <i>Standard</i> will be revised to more explicitly list the plastic types that will be included to best represent modern plastic demand. The plastic types listed here will be included in the list as relevant.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
127	Other	2.1	Broadening the scope	<p>Would it be possible to differentiate mono-material plastic products from those mixed or multilayered? Since mono-material products are easier to recycle, more credits could be scored for recovering them. By doing that, however, there's a high risk that multi-material products won't be recovered, since they score less points.</p> <p>In many developing countries the plastic market is not only driven by the 7 types of plastic. Price will change depending on its color, for example. It is important that the classification is revised regularly to ensure it stays up to date with the existing types of plastic so it doesn't become obsolete.</p>	<p>Recovery projects will not be required to identify material by plastic type due to the practical challenges of doing so but have the option to report plastic type if feasible. Recycling projects will be required to identify material managed by the plastic types listed out in the Scope of the <i>Standard</i>. The serial numbers associated with each credit will include the plastic type(s) managed by the project if the project provides this information. Further details on the types of plastic being managed (including non-type based metrics for classification) can be listed in the project description.</p> <p>As mentioned above, the identification of plastic type will take place based on the plastic and material types listed out in the Scope of the <i>Standard</i>. Projects will be able to identify both mono-material plastics and have the option to identify materials as mixed plastics or composite material (per the parameters defined). Based on Verra's experience, the value of the credits from projects managing different types of plastics will be determined by the market demand for projects managing certain types of plastic over others.</p>
128	Service Provider	2.1	Standard should differentiate controversial plastic types	<p>Depending on the recycling and environmental properties, some controversial plastic types should not be included in the Standard in the same way as less ambiguous types such as PET. For instance, expanded polystyrene food containers and cups as well as oxo-degradable plastics are to be banned in the EU due to their critical properties and availability of better alternatives. Further bio-based or bio-degradable plastics are harder to recycle and come with their very own challenges. They thus need particular attention. While it is of course still helpful to incentivise the collection of any waste, the recycling and reuse of some of these should not be supported in the same way.</p>	<p>Verra acknowledges that certain plastic types have less preferable recycling and environmental properties. However, to account for the current production and use of these types of plastic, Verra sees value in allowing a range of plastic types (with certain exceptions as listed out in the Scope) in the Scope of the <i>Standard</i>. The eligibility of recovery and recycling activities managing these materials will be contingent on whether the activity is additional in the region. The recovery and recycling of most plastic types is preferable to them remaining in the environment or being burned. Verra is working with the assumption that with more stringent regulations against the use of these materials, there will be reduced market demand for them and they will be phased out over time.</p>
129	Service Provider	2.1	Broadening scope and introduction of "food-grade" terminology	<p>The standard would benefit from broadening the scope from 'plastic' to 'plastic and product packaging' to include other composite materials such as aluminum foil lined sachets and pouches, beverage cartons, etc. It is not clear from the current description whether or not these are included.</p> <p>A distinction between non-industrial and industrial projects may be helpful, which will consider the ability of the project proponent to distinguish between plastic types, polymers, etc.</p> <p>Further, many product packaging producers will be interested if this standard can be used / is applicable for materials that require food grade ratings. An introduction or section on food grade materials will be welcome.</p>	<p>The Scope of the <i>Standard</i> will be revised to reflect modern plastic demand and more explicitly list the plastic types and parameters of composite materials allowed.</p> <p>Recovery projects will not be required to identify material by plastic type due to the practical challenges of doing so but have the option to report plastic type if feasible. Recycling projects will be required to identify material managed by the plastic types listed out in the Scope of the <i>Standard</i>. This will apply to both industrial and non-industrial projects.</p> <p>The determination of whether the recycled plastic can be used for food-grade material is the responsibility of the recycler and the subsequent manufacturer, and is not within the purview of the <i>Standard</i>.</p>
131	NGO	2.1	Composite material - standard needed for what proportion counts as plastic	<p>McKinsey.org agrees with point #2 of section 2.1.1 provided that there is an approved standard for what proportion of the composite material counts as plastic</p>	<p>The Scope of the <i>Standard v0.2</i> will be revised to define the parameters of composite materials that will be covered under the Program.</p>
132	Service Provider	2.1	Regarding waste sorting - define eligibility specifically for Accounting	<p>All types of plastic wastes need to be included under the Standard as plastic in any form is a big environmental hazard. The Other Plastics (O) category should essentially allow coverage of all possible types without limiting on any category. Here our rationale is that there are few types of plastic wastes which may or may not fall under the listed solid category of the plastic wastes and many of them are left unattended due to complexity in their recovery/sorting and recycling. Therefore, this standard can help bringing those plastic wastes into consideration and through an effective crediting mechanism we can help adopting recycling of such plastic wastes in scale. One of the examples of such type is Melamine based plastic wastes which are mainly found in discarded or disused currency notes or rejected bond papers etc. Due to the complexity and less effectiveness of recycling, such wastes are generally left unattended or emphasis is low.</p>	<p>Noted. The Scope of the <i>Standard v0.2</i> will be revised to more explicitly list the plastic types allowed under the Program and clarify whether any plastic types or composite materials are not allowed.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
178	Service Provider	2.1	Business as usual and avoidance of plastic packaging. Governments can eventually tax to internalize the cost of plastic package waste or packagers can voluntarily internalize this cost seeking environmental benefits among others. As these costs internalize, the avoidance of plastic packaging should become more cost effective and package material switching, reduction and reuse should become an option.	My comment is that maybe the scope should from the beginning include project activities that include avoidance, reduction, reuse and material switching using baseline scenarios and additionally to promote inhouse investment on cleaner packaging and/or packaging management.	<p>We agree with the examples you gave and the additionality tests required in each methodology would prevent such projects from being eligible under the Program. However, as you point out, post-industrial waste could be recovered and/or recycled under the Program as long as additionality can be demonstrated for those activities.</p> <p>To help ensure projects do not receive credits under the Program for material that was purposefully generated to be recovered or recycled we included a statement in Section 2.1 of the <i>Standard</i> that states "The scope of the Plastic Accounting Program excludes projects that can reasonably be assumed to have generated plastic waste primarily for the purpose of its subsequent recovery and/or recycling."</p>
179	NGO	2.1	Scope expansion to reuse and reduction	There is a clear need to verify company claims around reduction and reuse of plastic - would be supportive of this scope expansion in the future, but also note that it may best be done under a separate standard / document.	As part of the 3R Initiative, Verra is working with partners to develop guidelines for corporates that define plastic waste reduction-related claims such as "net zero plastic waste to nature", "net zero plastic waste" and "net plastic neutral". We recognize the importance of such claims and will work to get them endorsed by the widest possible group.
181	NGO	2.1	Activities that undertake reduction or reuse of plastic waste should be included	We note that the Plastic Accounting Program may be expanded to project activities that undertake the reduction or reuse of plastic waste. Such project activities should be intentionally included from the start as they are a vital means of reducing overall dependence on single-use plastic. Including such project activities in the Plastic Accounting Program from the start will ensure that reduction principles and strategies are given the priority needed.	<p>Reduction and reuse will not be included in the first version of the <i>Standard</i>. We want to encourage companies to take action as far "upstream" as they can, including by reducing the amount of plastic that they use and developing reuse models, <i>prior to using credits</i>.</p> <p>As part of the 3R Initiative, Verra is working with partners to develop guidelines for corporates that set out a "mitigation hierarchy": a sequence of steps to be taken prior to engaging in mitigation efforts. At a high level, the steps are as follow: (1) direct action (reducing plastic content, implementing reuse models), (2) value chain actions (sourcing more recycled content to stimulate collection), and finally (3) engaging in mitigation efforts.</p> <p>We will explore opportunities to credit reduction and reuse outside of a company's footprint for the second version of the <i>Plastic Standard</i>.</p>
182	Service Provider	2.1	We note that the Standard does not currently include projects that undertake the reduction or reuse of plastic waste. We seek clarification of whether corporates will be able to undertake inseting projects through application of this Standard.	Provide clarification	<p>Reduction and reuse will not be included in the first version of the <i>Standard</i>. We want to encourage companies to take action as far "upstream" as they can, including by reducing the amount of plastic that they use and developing reuse models, <i>prior to using credits</i>.</p> <p>We will explore opportunities to credit reduction and reuse outside of a company's footprint for the second version of the <i>Plastic Standard</i>. Using the <i>Standard</i> to account for reductions or reuse in the inseting context case takes away the challenge of double-counting, which is one significant obstacle in crediting reductions and reuse.</p>
184	NGO	2.1	Reduce/reuse is an important step for future development as both reduction and reuse are more desirable than recycling. There is definitely a need to verify company claims around reduction of plastics.		<p>As part of the 3R Initiative, Verra is working with partners to develop guidelines for corporates that provide best practices for transparency in corporate reporting around direct and value chain actions and mitigation efforts.</p> <p>The guidelines for corporates will also define plastic waste reduction-related claims such as "net zero plastic waste to nature", "net zero plastic waste" and "net plastic neutral". We recognize the importance of such claims and will work to get them endorsed by the widest possible group.</p>
185	Industry	2.1	"The scope of the Plastic Accounting Program does not currently include project activities that undertake the reduction or reuse of plastic waste."Have we ever discussed this point with the 3RI members? If so, how it is foreseen? Would issuance of credits be applicable for reduction and reuse activities?		<p>Reduction and reuse will not be included in the first version of the <i>Standard</i>. We want to encourage companies to take action as far "upstream" as they can, including by reducing the amount of plastic that they use and developing reuse models, <i>prior to using credits</i>.</p> <p>We will explore opportunities to credit reduction and reuse outside of a company's footprint for the second version of the <i>Plastic Standard</i>.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
225	Service Provider	2.1	Scope exclusion "The scope of the Plastic Accounting Program excludes projects that can reasonably be assumed to have generated plastic waste primarily for the purpose of its subsequent recovery and/or recycling."	Suggest adding, "The scope also excludes plastic reductions that may occur indirectly as a result of the Project Proponent's activities. Examples of exclusions are upstream manufacturing changes or public behavior change." The history of the carbon market suggests that it is prudent to explicitly foreclose these types of proposals. Issues around reliable quantification and double-counting arise.	We will consider reflecting this risk in Section 2.1 of the <i>Standard v0.2</i> .
229	Service Provider	2.1	Would it help to define further the types of goods / examples of each materials? The goods definition may be more relevant to some developing markets as recycling is driven by informal sector.		Verra acknowledges that it will help to further define the types of goods and materials allowed. The Scope of the <i>Standard</i> will be revised to more explicitly state the plastic types and parameters of composite materials allowed. Verra will consider including examples as long as they don't prohibit the understanding of the full Scope.
231	NGO	2.1	Excluding projects that generate plastic waste - this needs clarification	Would like to understand this statement a bit better. What scenario is this statement guarding against? Perhaps it makes more sense to frame this around the need for additionality? (i.e. excludes projects that would have happened regardless of whether credits were available or not).	The purpose of this statement is to ensure that projects are not able to claim to recover or recycle plastic waste that they are generating for the sole purpose of performing the project activity and issuing credits. This is a different concept from additionality in that it is meant to ensure that all projects are tackling pre-existing plastic waste, not to ensure that projects that would have happened regardless of credit availability are excluded.
232	NGO	2.1	Would like to understand this statement a bit better. What are some examples of projects that create plastic waste primarily for recovery and recycling? I think I understand what they are trying to do with this statement (highlight the importance of additionality of projects) but it would be good to be clearer on this (i.e. excludes projects that would have happened regardless of whether credits were available or not)		See response to Comment #231.
233	NGO	2.1	Would other resins be included in the standard - e.g., ABS or polycarbonates? Some resins associated with products like electronics arguably also need to be supported by the Standard if the purpose is foster building of infrastructure to divert plastics from disposal.	Include clarity on resins and products not included and reasons why/why not.	Other resins that are not currently listed in the <i>Standard</i> will be allowed in the Program. The <i>Standard</i> will be revised to explicitly list the plastic types and parameters for composite materials that will be allowed.
236	Service Provider	2.1	Scope	The first item under 2.1.1 should be "Recovery and recycling of plastic waste." It be obvious, but it needs to be stated.	While the Program includes plastic waste recovery and recycling activities, only project activities that are supported by an approved methodology under the Program are included in the Scope of the Program. Thus the statement needs to be limited to project activities supported by approved methodologies and cannot be broadened to include all recovery and recycling activities.
237	NGO	2.1	While all opportunities for obtaining credits addressed in this program are important, it neglects the safety, simplicity, and standardization of the chemistry of plastic which are tackled at the production stage. Consider including credits for greening the chemistry of plastic by chemically changing the plastic building blocks so that plastic is less harmful from the beginning and simplifying and standardizing the building blocks of plastic to make it more easily recycled.		Verra agrees that it is important to tackle the plastic waste issue across the value chain, including changing the chemistry of plastic during production to reduce its negative impacts on the environment. Producing plastic that is more easily recyclable would be accounted for and credited as <i>reducing</i> plastic waste, which will not be a part of the first version of the <i>Standard</i> (due to complications involved in double-counting of the reductions in corporate footprints). However, we are looking into including reductions (and reuse) in the second formal version. As part of the 3R Initiative, Verra is working with partners to develop guidelines for corporates that provide best practices for transparency in corporate reporting around direct and value chain actions and mitigation efforts.
238	NGO	2.1	Is the standard applicable to all forms of resins in all products? Do you intend this to be focused on packaging mostly, or only? For example, would the standard apply to PVC only in the form of packaging and not building products (e.g., siding, pipe)? Would PET apply to packaging only or to durable forms of polyester - carpet, textiles?	Include clarity about the scope of products eligible or in the focus of the Standard	The <i>Standard</i> is intended to address any product, including packaging, that includes any type of plastic resin (products and packaging that are composed of composite materials that contain plastic). We will consider how to make this more explicit in the Scope section.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
95	NGO	2.1.1	<p>I suggest that plastics can be collected from different categories and the incentive can be to issue more or less credits per KG / Tonne depending on its origin. This creates a higher value for the low value and difficult to recover plastics, which one would hope encourages the collection of these too.</p> <p>For example:</p> <p>BASELINE</p> <p>HIGH VALUE PLASTICS Recycled traditionally PET, PP, HDPE Credit issuance to Recovery Ratio: 0.5:1</p> <p>LOW VALUE PLASTICS All other low value polymers and composites. Usually unrecyclable. Credit issuance to Recovery Ratio: 1:1</p> <p>ADDITIONAL VALUE</p> <p>TERRESTRIAL ENVIRONMENTAL PLASTICS Recovered from environment (Landfill / terrestrial / ocean bound) MUST BE ETHICALLY SOURCED Credit issuance to Recovery Ratio: +0.5:1</p> <p>MARINE ENVIRONMENTAL PLASTICS Recovered from environment (Offshore / Near Shore / Coastline / River) MUST BE ETHICALLY SOURCED Credit issuance to Recovery Ratio: +1:1</p>		<p>Verra acknowledges the value of assigning different values to plastics by polymer type to incentivize the recovery of traditionally unrecyclable or hard to collect plastics. Given the significant amount of time and research required to develop an impact equivalency tool to assign increased value to low-value plastics, Verra is aiming to include this in a future version of the <i>Standard</i>.</p> <p>Currently the Program accounts for all plastic types in an equal manner. Recovery projects will have the option to report on the plastic types if feasible, given the low feasibility of material sorting and identification in certain cases. Recycling projects will be required to identify material by the plastic types listed in the Scope of the <i>Standard</i>. The serial numbers associated with each credit will include the plastic type(s) managed by the project if the project provides this information.</p> <p>With the plastic type(s) being reflected in the serial number of the credit, credit buyers will be able to purchase credits from projects that manage plastic types they are unable to manage directly in their value chains (a majority of which tends to be low-value plastics). Based on Verra's experience, the value of the credits from projects will be determined by the market demand for projects managing certain types of plastic over others (i.e., credits from projects managing low-value plastic will potentially have a higher value).</p>
130		2.1.1	In African countries, elastomers (natural and artificial rubbers) could be included due to the importance of tyre recycling activities to produce metal		While elastomers are also a type of polymer, they are not categorized as a type of plastic and do not fall under the Scope of the <i>Standard</i> .
133	NGO	2.1.1	"styrofoam" is a brand name	Change "styrofoam" to "expanded polystyrene"	"Styrofoam" will be replaced with "polystyrene foam" in v0.2 of the <i>Standard</i> .
177	NGO	2.1.1	We do not agree with the inclusion of reduction and/or reuse of plastic waste due to the inability of measuring that independently and also the true reason underpinning that change. It may just be the side effect of a pre-planned process upgrade for example and this should not count. If the standard included the reduction of used or waste plastic in the future, this must always have lower value units to encourage the continued efforts to invest in infrastructures. If not, then this may become a point of standard abuse.		<p>Reduction and reuse will not be included in the first version of the <i>Standard</i>. We want to encourage companies to take action as far "upstream" as they can, including by reducing the amount of plastic that they use and developing reuse models, prior to using credits.</p> <p>We will explore opportunities to credit reduction and reuse outside of a company's footprint, keeping in mind the challenges you point out, for the second version of the <i>Standard</i>.</p>
69	Service Provider	2.1.1 (1)	Will Verra define what is meant by "Other plastic"? Is this term intended as a catch all to include any type of plastic (e.g. if collected as mixed plastics), or is it designed to capture certain material types?	Include definition of what can be included under this term. Consider whether definition of plastic types can be included in Program Definitions.	"Other plastic" is a plastic category as identified by the SPI Resin Identification Codes. It is referenced by SPI Code 7.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
96	NGO	2.1.1 (1)	PET, HDPE and PP are widely recycled currently and infrastructures are largely in place already. The remaining plastics are classed as low value plastics and it is imperative that the standard also encourages the recovery of these plastics too. In order to do this. PET, HDPE and PP should be the baseline value. The other polymers should then have a premium value in order to encourage their recovery. Further to this, there should be a stepped value depending on polymer type (explained above) and method of recovery (traditional recycling being lowest, terrestrial collection second, ocean plastic highest). Plastics are made up of several different value polymers and then how to collect / process them again varies widely in cost.		See response to Comment #95.
123	Industry	2.1.1 (1)	We should include Beverage Carton as separate number item		Beverage cartons (or an equivalent term such as composite packaging or composite materials) will be listed as a separate item in the Scope (Section 2.1) of the <i>Standard v0.2</i> .
106	Service Provider	2.1.1 (3)	How is eligibility defined by project activities supported by Methodology under plastic accounting standard?	Is it possible for the standard to define what type of methodologies can be approved?	Yes, requirements for methodology development will be provided in a document separate from the <i>Standard</i> . Two methodologies covering three activities are under development now for release with v1.0 of the Program. Other methodologies can be developed and approved under the Program to cover activities not covered by the initial methodologies. Verra has preference for methodologies that use standardized approaches.
52	Service Provider	2.2	Amendment to and/or addition of principles	Change in language suggested that is more suitable throughout the standard: Instead using 'plastic waste sources', use of 'source streams'.	Verra will replace "plastic waste sources" with "plastic waste source streams".
53	Service Provider	2.2	Amendment to and/or addition of principles	2. Additional definition: 'source stream' means a specific product packaging or plastic type, raw material (e.g., nurdles) or other composite material giving rise to pollution at one or more locations as a result of its consumption or production.	Verra will replace "plastic waste sources" with "plastic waste source streams".
54	Service Provider	2.2	Amendment to and/or addition of principles	4. Additional definition: 'activity data' means the data on the amount of product packaging, plastics, or other plastic-composite materials collected or recycled by a process as relevant for the calculation-based monitoring methodology, expressed in mass in tonnes, or as volume in cubic metres or litres, as appropriate.	Verra will consider including this definition of 'activity data'.
55	Service Provider	2.2	Amendment to and/or addition of principles	6. Broadening principle of 'accuracy' to: 'accuracy' means the closeness of the agreement between the result of a measurement and the true value of the particular quantity or a reference value determined empirically using internationally accepted and traceable calibration materials and standard methods, taking into account both random and systematic factors > Operators shall ensure that neither systematically nor knowingly inaccurate data will be reported and used in the determination of credits/units by the verifier. They shall identify and reduce any source of inaccuracies as far as possible. They shall exercise due diligence to ensure that their calculations and measurements of activity data exhibit the highest achievable accuracy.	Verra will broaden the principle of accuracy reflecting the suggested language.
57	Service Provider	2.2	additional definitions and concepts	3. 'measurement system' means a complete set of measuring instruments and other equipment, such as sampling and data processing equipment, used for the determination of variables like the activity data	Verra will consider including this definition.
58	Service Provider	2.2	additional definitions and concepts	4. 'proxy data' means values which are empirically substantiated or derived from accepted sources and which an operator uses to substitute the activity data for the purpose of ensuring complete reporting when it is not possible to generate all the required activity data in the applicable monitoring methodology	Verra will consider including this definition.
61	Service Provider	2.2	Amendment to and/or addition of principles	7. Updated language: 'Conservativeness' Use conservative assumptions, values and procedures to ensure that source streams are not overestimated.	The language used currently pertains to making conservative assumptions on the amount of plastic recovered and recycled by the project. The proposed definition does not reflect the intent of the principle since it is referring to a conservative assumption of the source(s) of the plastic waste.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
134	Service Provider	2.2	Amendment to and/or addition of principles	3. New principle definition: 'completeness' Monitoring and reporting shall be complete and cover all processes and source streams belonging to activities while avoiding double-counting.	We agree on the intent of the principles and your suggestion. Complete monitoring and reporting is covered by completeness, relevance and transparency. The processes and source streams are covered under relevance and avoided double counting falls under all six principles.
135	Service Provider	2.2	Amendment to and/or addition of principles	8. Additional principle: Continuous improvement Operators shall take account of the recommendations included in the verification reports in their consequent monitoring and reporting.	We agree that continuous improvement could be an appropriate principle to include in the Program. We are exploring where best to reflect this principle and will potentially include it in the list of principles in Section 2.2.1 in v0.2 of the <i>Standard</i> . In addition to taking into account the recommendations included in verification reports, projects will be encouraged to report on social and environmental benefits achieved beyond the minimum social and environmental requirements in the <i>Standard</i> .
136	Service Provider	2.2	Amendment to and/or addition of principles	5. Broaden principle of consistency to: Consistency, comparability and transparency a. Monitoring and reporting shall be consistent and comparable over time. b. Operators shall obtain, record, compile, analyse and document monitoring data, including assumptions, references, activity data, and conversion factors, in a transparent manner that enables the reproduction of the determination of credits/units by the verifier.	We hesitate to include comparability as a principle given that project circumstances will vary greatly and it would not necessarily be appropriate to compare results between projects. The circumstances in just one project could vary greatly between verifications meaning that consistency in how the activities are monitored and impacts reported is more important over time. However, we will consider whether Comparability and Verifiability should be included in v0.2 of the <i>Standard</i> per ISO 14025:2006). Transparency is its own principle in the <i>Standard</i> and is also a principle that credits issued under the Program must meet, which is outlined in the <i>Program Guide</i> . It is required that projects provide sufficient information and evidence for the verifier to reproduce the calculations and determination of credits to be issued.
137	Service Provider	2.2	Two principles (per ISO 14025:2006) are missing: Comparability and Verifiability. Comparability: assuring that same kind of projects are going to be evaluate in the same form Verifiability: assuring that the informaiton presented is posible to be evaluate and verified bya third party.		The inclusion of Comparability and Verifiability will be considered for v0.2 of the <i>Standard</i> and/or <i>Program Guide</i> .
192	NGO	2.2	Environmental and Social Good	I think a principle expressing the intended outcome of the application of the standard is missing, explicitly around the intention to improve environmental and social outcomes.	The intention of the Program is to ensure that there are no negative environmental and social impacts resulting from project activities. This, along with the objective of the Program to support and scale-up activities that increase plastic waste recovery and/or recycling from the environment, will be made explicit in <i>Program Guide</i> .
214	NGO	2.2	Environmental and social principles needed	A set of social and environmental principles could sit alongside these more technical principles.	The social and environmental principles are listed out as "do no harm" level social and environmental safeguards in Section 3.13 of the <i>Standard</i> . The principles in Section 2.2 should be applied by projects when addressing the Safeguard requirements in Section 3.13.
239	Service Provider	2.2	Fairness	Most standards in this space (like GRS) have an inherent disposition to a "flat tax" approach of applying audit costs. Normally these standards will apply a unit cost per certificate or per audit. It is a default logic since each transaction requires an incremental amount of work. However this generally has the unforeseen effect of pricing out smaller operations. We know that the vast amount of plastic leakage happens in remote areas, not concentrated ones, and that the incorporation of it into industrial pathways is highly challenging. Adding an additional flat-payment-per-document/audit could easily double the cost per kilogram of material recovered and be seen as punitive. However by incorporating a principle of fairness into this standard, it would follow to look for creative structures like a sliding scale, or subsidized transaction costs for micro-enterprise operators. Perhaps even a standard cost-per-ton transaction cost would represent a true recognition of the difficulties in the business of growing recycling efforts in rural areas.	Fairness has been, and will continue to be, a key consideration as we develop the Plastic Accounting Program. Verra will take this comment into account particularly as we develop the assessment requirements, which will be included in the <i>Plastic Standard, v0.2</i> and the <i>Program Guide, v0.1</i> documents, as part of the second public consultation. More specifically, we are considering different assessment requirements for micro-, small- and large-scale projects that reflect their different needs, operations and geographical contexts.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
111	NGO	2.2.1	Principle of Transparency: Disclose sufficient and appropriate plastic waste-related information to allow intended users to make decisions with reasonable confidence. What safeguards are in place to ensure accurate reporting?		All projects must use the Project Description Template and Monitoring Report Template, which include guidelines for how and what to report related to the project design and quantification. The templates are based on the rules and requirements of the Program and help ensure project proponents are providing the necessary and accurate information about the project. The auditor responsible for validating and/or verifying the project must check the reports and make a statement about their accuracy before credits can be issued to a project.
235	Industry	2.2.1	Can you clarify what "The scope of the Plastic Accounting Program excludes projects that can reasonably be assumed to have generated plastic waste primarily for the purpose of its subsequent recovery and/or recycling." means?		The purpose of this statement is to ensure that projects are not able to claim to recover or recycle plastic waste that they are generating for the sole purpose of performing the project activity and issuing credits. It is meant to ensure that all projects are tackling pre-existing plastic waste.
265	Other	2.3	Timing not provided	What's the actual timing? Perhaps the following information should be given: 1. Average time taken for the completion of the documentation 2. Time taken for the revision by the institution and feedback 3. Does the certification last forever? If not, every how many years must one re-certify?	Verra will take these suggestions into account. In general, timing for completion of the documentation varies greatly based on project activity type, experience of the project proponent and the development stage of the project (i.e., under development or already implemented). However, an example timeline could certainly be provided as a resource. Verra's own review and feedback timelines will be provided in the <i>Program Guide, v0.1</i> , which will be included in the second public consultation. Once registered with the Plastic Accounting Program, projects will remain registered unless the project proponent submits a formal request to withdraw from the Program. In addition, we are considering requiring projects to verify within a certain number of years of the project validation. Finally, projects that have selected a seven year, twice renewable crediting period will be required to undergo validation every seven years in order to renew their crediting period.
265a	Service Provider	2.3	I agree. This section lacks helpful detail in terms of required or voluntarily chosen verification frequencies. Based on my experience in mandatory and voluntary verification schemes, and voluntary certification schemes, the frequency is often chosen based on the performance of a project / an installation. Something that could be considered for this initiative too.		We are considering requiring projects to verify within a certain number of years of the project validation, and will also take the suggestion to require verification frequencies into account. It is likely that methodologies applied by the projects will dictate required verification frequencies, as these will be specific to the project activity type and context.
265b	Service Provider	2.3	This sections may detail timeline for projects with a project start date between 1 January 2016 and 31 December 2018, the validation completion date, verification date.		In general, timing for completion of the stages of the project registration process varies greatly based on project activity type, experience of the project proponent and the development stage of the project (i.e., under development or already implemented). However, an example timeline could certainly be provided as a resource, and we will consider this.
272	Industry	2.3	Verification	Consider what third party verification might entail - will this be entirely self reported? Will it be possible to audit?	Audits (validations and verifications) will be conducted by accredited, independent third-party entities. All validations and verifications will also be reviewed internally by Verra staff. The assessment process and requirements will be included in the <i>Plastic Standard, v0.2</i> and <i>Program Guide, v0.1</i> documents as part of the second public consultation.
274	Service Provider	2.3	What is verification and what are the criteria used for verification?		Verification is the periodic ex-post independent assessment by a validation/verification body, conducted in accordance with the Plastic Accounting Program rules, of the plastic waste recovered and/or recycled by the project during a monitoring period. The Plastic Accounting Program assessment process and structure, including requirements for validation/verification, will be included in the <i>Plastic Standard, v0.2</i> and <i>Program Guide, v0.1</i> documents as part of the second public consultation.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
274a	NGO	2.3	Assessment requirements will be set out in Section 4 of the Plastic Standard. As you have noticed, we currently have the expectation that the validation and verification will be the form of assessment for this program. Verification is the periodic ex-post independent assessment by a validation/verification body, conducted in accordance with the Plastic Accounting Program rules, of the plastic waste recovered and/or recycled by the project during a monitoring period. Verra will be developing assessment requirements in the coming months; these requirements will be ready for review in the second public consultation.		The commenter correctly notes that the Plastic Accounting Program assessment process and structure, including requirements for validation/verification, will be included in the <i>Plastic Standard, v0.2</i> and <i>Program Guide, v0.1</i> documents as part of the second public consultation.
274b	Service Provider	2.3	I appreciate that further details are still to be established for the periodic verifications, and that these will take some time. It is important at this stage to unequivocally establish the framework though for verifications. E.g., Project proponents will need to demonstrate that they adhere to the principles set out in this standard, and that they operate their projects / implement their activities in accordance with the submitted project description. These two 'compliances' are relatively easy to incorporate into the existing framework, and will provide more clarity for interested parties at this early stage.		The Plastic Accounting Program assessment process and structure, including requirements for validation/verification, will be included in the <i>Plastic Standard, v0.2</i> and <i>Program Guide, v0.1</i> documents as part of the second public consultation.
81	Service Provider	3	perceived contradiction: Certain sections are not applicable to projects using the Standard solely for accounting purposes, and are marked as such.	The footnote is a perceived contradiction with this sentence in the introduction "Projects using the Plastic Standard solely for accounting purposes are not eligible to issue plastic units"	Projects using the <i>Standard</i> solely for accounting purposes are simply using the <i>Standard</i> to apply standardized quantification practices and are therefore not eligible to issue credits. Such projects are not required to demonstrate additionality, follow the eligibility requirements or any requirement pertaining to the issuance of credits, and are not subject to validation or verification. It is necessary to note the requirements that are and are not applicable to projects using the <i>Standard</i> only for accounting versus for issuance of credits. Verra will determine a better way to make that distinction so as not to confuse readers.
84	Industry	3.1	We have not been able to understand and assess what would be the impact of the coexistence of this scheme with EPR schemes.		Extended producer responsibility (EPR) schemes could use the <i>Plastic Standard</i> to account for the impact of the activities they support, providing assurance to companies that invest in the scheme. In addition, <i>Plastic Standard</i> projects could be used as activities under new and emerging EPR schemes, transitioning from credit finance to EPR finance. Finally, in cases where it benefits overall waste recovery and recycling in a country or jurisdiction and is agreed with government, credits from <i>Plastic Standard</i> projects could be used as an alternative to a company's participation in an EPR scheme.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
102	Other	3.1	Referring to website + Methodologies	<p>Some information in this segment is supposed to be checked in Verra's website, but it would be easier to include this documents as Annexes:</p> <p>List of methodologies. (3.1.2) The template to complete the project description. (3.2.1) The template to complete the monitoring report. (3.2.3)</p> <p>Otherwise, whenever referring to website information, add the link to make it more user friendly.</p> <p>In general, in all the 3rd section the vocabulary used is confusing, if the application it's only going to be available in English, nomenclature should be simplified. Example of confusing sentences:</p> <ol style="list-style-type: none"> 1. At least one set of eligibility criteria for the inclusion of new project activity instances shall be provided for each combination of project activity and geographic area specified in the project description 2. Where inclusion of a new project activity instance necessitates the addition of a new project proponent to the project, such instances shall be included in the grouped project within two years of the project activity instance start date. <p>We are working on several projects towards the formalization of informal waste pickers. We can imagine waste picker associations trying to apply to this scheme and not meeting all the requirements, sometimes due to lack of resources, sometimes due to lack of understanding. Therefore, we find advisable to make sure the proposed methodologies are written in a straightforward manner that's easy to understand. Also, methodologies could have a tracking system that indicates to users what % of the requirements have been fulfilled, so they can review their progress as they move along.</p> <p>When are methodologies going to be available? Is this going to be a closed list or is it going to be open for consultation?</p>	<p>Given that new methodologies will be added to the Program over time, it is best to list the approved methodologies on the website and update the website as necessary. In our experience, project proponents prefer to be able to download the <i>Project Description</i> and <i>Monitoring Report Templates</i> from the website so that they can insert their project information directly into the document. We will provide links to the webpages for these documents to the extent possible.</p> <p>We recognize that much of the language used in the <i>Standard</i> is confusing and will be revising the language for simplicity.</p> <p>There are two methodologies covering three activities under development, which will be posted for public consultation later this year. We aim to write these methodologies in a simple and clear manner. Until monitoring and verification systems become more advanced, we will not be able to develop the methodologies in a way that let users know when requirements have been fulfilled. However, it is an interesting idea that we will explore as and when technologies allows us.</p>
105	Service Provider	3.1		<p>Projects should be allowed to have methodology deviations (after validation and confirmation through Verra). similar to CDM scheme, it should be possible for projects to have a deviation from the methodologies. Of course only possible after validation and confirmation through VERRA</p>	<p>Agreed, particularly in the early stages of the Program. Projects may run into unanticipated issues and we need the flexibility to address these issues with deviations. We will include methodology and project description deviations in v0.2 of the <i>Standard</i>.</p>
108	Service Provider	3.1	Methodology validity periods	<p>How will validity periods be determined? The standard should speak to this or should establish validity periods.</p>	<p>Validity period will be determined if/when methodologies are updated. Two methodologies covering three activities are under development now for release with v1.0 of the Program. Other methodologies can be developed and approved under the Program to cover activities not covered by the initial methodologies. At any point in the future, a methodology may need to be updated to better reflect the conditions on the ground. These updates could be done by Verra as part of regular Program updates and/or by other stakeholders who need a methodology applicable to their project conditions. When a methodology is updated, the validity of the previous version will expire requiring projects to update to the latest version at their next verification. Verra will establish the expiration date and provide projects with enough time to make adjustments for the latest version of the methodology.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
109	Service Provider	3.1	Given operators the option to learn and grow with the standard, I suggest the inclusion of allowing for a fall-back methodology and the use of proxy data when it is not possible to generate all the required activity data in the applicable monitoring methodology. These concepts have been widely accepted in Europe under the EUETS, and a fall-back methodology requires prior approval by 'the authority', which in the case of this standard can be Verra or the chosen verifier.	<p>It has been recognised that special circumstances may exist in projects under which applying the measurement system demanded by the methodology is technically not feasible, or leads to unreasonable costs for the operator. Although there might be other reasonably precise methods of monitoring, these circumstances would render the operator non-compliant with the Methodology and the Plastic Standard. In order to avoid such unwanted "pseudo-non-compliance" with the Methodology, the Plastic Standard allows the operator to apply a calculation approach using proxy data.</p> <p>The operator may propose in a monitoring plan using an alternative monitoring methodology (Fall-back methodology), for which she/he can demonstrate that it allows compliance with the required principles set out in Section 2.2. Consequently, the operator must provide a justification for using the fall-back methodology demonstrating unreasonable costs or technical infeasibility.</p> <p>Note: Due to the increased administrative effort required for fall-back methodologies, operators are advised to carefully check whether the standard methodological approach is still possible for all source streams. In particular, operators should strive to use "standard" methodological approaches even if in the end a fall-back methodology is required for a limited part of the monitoring and reporting period.</p>	Two methodologies covering three activities are under development now for release with v1.0 of the Program. Verra's goal is to develop methodologies that use standardized approaches for demonstrating additionality and setting the baseline to reduce the burden on projects. We also aim to write the methodologies in a clear, stepwise manner so that they can be easily applied in varying user/project contexts. These methodologies will be available for public consultation later this year at which point we will have a better idea of whether and how many projects could need a "fall back methodology". It is our goal to make it easier for projects to use an approved methodology rather than having to develop one on their own. However, if that is determined not to be the case we will consider building in the "fall back methodology" option as proposed.
109a	Service Provider	3.1	I added my comment using the EU ETS scheme as a reference rather than the CDM scheme. Working as a verifier with both for years, I found the EU ETS scheme more practical and pragmatic		See response to comment #108.
109b	Service Provider	3.1	Taking into account that each methodology will be created in basis on real projects, there is no logic to allow a fall-back methodology. Any deviation, has to be treated either as non permanent, where the verifier might be the one to accept or not and permanent deviation that can only be accepted by the Verra. Any project that is aware that the methodology cannot be applied, then should present a revision for the methodology or a new methodology.		See response to comment #108. See response to comment #104 which explains that we will include methodology deviations in v0.2 of the <i>Standard</i> .
109c	Service Provider	3.1	It may appear that methodologies as known in the carbon space are not suitable for the initiative, based on information gathered on the ground and based on my experience in other markets, where this concept doesn't exist. It puts too much burden on the project proponents, and potentially will cause delays and drop-outs, posing a threat to the initiative. Alternatives are widely available in other spaces outside the CDM/VCS space, which can be made use of.		See response to comment #108.
92	Industry	3.1.1	Given that some documents of the program are not yet developed how can one be sure about the rules and requirements to develop a project? How can a project proponent get a project off the ground now not knowing the requirements?		<p>The <i>Program Guide</i> which is the overarching program document, providing the rules and requirements governing the Plastic Accounting Program and further describing the constituent parts of the program will be part of the second public consultation. The methodologies approved under the Program will include criteria and methods related to applicability conditions, the project boundary, setting the baseline, demonstrating additionality, quantification of recovered and/or recycled material and monitoring for specific project activities. Verra is in the process of developing two initial methodologies covering informal collection, new/expanded municipal waste collection, and new/expanded mechanical recycling infrastructure activities. The draft versions of these methodologies will be open for public consultation in later in 2020.</p> <p>All documents relevant to the development of projects under the Program will be available at the launch of the Program in early 2021.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
107	Industry	3.1.2	Not clear what tools or modules would be as the methodologies are not established.		Two methodologies covering three activities are under development now for release with v1.0 of the Program. These methodologies will be available for public consultation later this year. Other methodologies can be developed and approved under the Program to cover activities not covered by the initial methodologies. Verra has preference for methodologies that use standardized approaches. Methodologies may refer to existing or new tools to be used in the quantification of recovered and/or recycled plastic. Methodologies may be divided into modules. For example, the recovery methodology may have steps that must be followed by all projects implementing recovery activities. However, there may also be modules within the recovery methodology that provide additional steps that must be followed by a specific type of recovery activity (e.g., a module for recovery from the environment and a module for municipal collection infrastructure). The exact structure and format of the methodologies is to be determined as the initial methodologies are developed.
110	Industry	3.1.2	Can you please give an example of how a project might not apply a methodology in full?		Where a methodology prescribes use of a particular calculation tool a project may not want to apply that particular tool. However, if it is required by the methodology it must be used. In other words, a project cannot pick parts of a methodology to apply and other parts not to apply. The exception to this is for projects using the <i>Standard</i> only to account for plastic recovery and/or recycling and not to issue credits. For those projects, certain requirements such as additionality are not applicable and that section of the methodology would not need to be applied.
101	Industry	3.1.3	The wording here would need to change to say that all projects need to comply with applicable laws. This would be more appropriate than this language here. "Projects and the implementation of project activities shall not lead to the violation of any applicable law, regardless of whether or not the law is enforced."		The language here requires that project proponents demonstrate that their projects are not in violation of applicable laws instead of being in compliance with them to account for the fact that it might be too burdensome on some projects to demonstrate the latter. In some cases it may not be relevant or feasible for projects to demonstrate compliance with all applicable laws. Therefore, it is less burdensome to demonstrate that the project is not in violation of applicable laws.
204	NGO	3.1.3	Does this include utilizing / encouraging the informal waste management industry on below living wages and below standard working conditions?		Per the safeguard requirements (3.13.2(2)), the project proponent will have to demonstrate that all project actors earn at least a regionally-determined living wage. Per 3.13.2(4) projects are also required to identify and mitigate potential hazards and risks associated with the implementation of the project activity and ensure that relevant safety measures are implemented.
71	Industry	3.1.4	The process to establish new requirements will need to be established and made visible		The process for establishing new requirements through Program updates will be provided in the <i>Plastic Accounting Program Guide</i> .
93	Industry	3.2	Please inform the timeline for the <i>Plastic Accounting Project Description Template</i> and the <i>Plastic Accounting Monitoring Report Template</i> to be available		The <i>Plastic Accounting Project Description Template</i> and the <i>Plastic Accounting Monitoring Report Template</i> will be publicly available at the launch of the Program in early 2021. The templates are being tested by pilot projects in the meantime.
99	Industry	3.2	The process is not clear enough and needs more explanation "In order to complete the project verification process, project proponents shall prepare a monitoring report, which describes the data and information related to the monitoring of plastic waste recovery and/or recycling"		The registration and issuance process will be described in detail in a separate program document. The <i>Standard</i> provides the project requirements, whereas the <i>Program Guide</i> and other supporting documents will outline the process requirements.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
104	Service Provider	3.2	Release from administrative burden - front loading of Monitoring Plan into Project Description. "project proponents shall prepare a monitoring report, which describes the data and information related to the monitoring of plastic waste recovery and/or recycling."	<p>In line with my earlier comments on methodologies, I encourage the initiative to further consider simplification and reduce administrative burden for the project proponents.</p> <p>The plan how to quantify the amounts of packaging/plastic waste either recovered or recycled by a project can and should be established within the PD. Drawing on experience from 'failure to plan the monitoring' in past CDM projects, we know that too little detail in the Monitoring Section of a PDD allowed project proponents for years in some instances, to operate their projects with no regards on how to quantify emissions during a verification exercise. The disappointment of reduced claims hit some developers hard, and the lesson from this is to be learnt. Anticipating and planning a solid monitoring system of a project at an early stage is highly beneficial for both the proponent and the verifier.</p> <p>The 'Monitoring Plan' therefore should be established in the PD, reducing the administrative burden to one core document i.e., the PD, rather than two separate ones that will be audited against. The amount of credits that will be claimed does not require prior determination, hence the data in the MP will be placeholders only. The credits issued will be determined during verification, and a simplified statement about credits issued can be provided after this. The EUETS is successfully implementing the 'one core document' rule for nearly a decade, hence serves as a solid example.</p> <p>Whilst this approach will require more thinking and planning in the early stages, the benefit will be that proponents are 'forced' to gain clarity on their potential claims at project perception stage. Would you agree to say that hardly anybody plans to fail, but fails to plan?</p>	<p>The <i>Project Description Template</i> requires projects to develop a monitoring plan at the beginning of the project development process to be reviewed during validation. We will review the requirements for the monitoring plan at this stage to ensure projects provide enough detail to implement the monitoring plan and prepare for verification.</p>
112	Service Provider	3.2	Specify monitoring/reporting period	<p>If there are no major reasons for not specifying the reporting period at this stage, it would be helpful to be presented with some more concrete information here.</p>	<p>There is no requirement for the length of monitoring periods. In other words, projects can decide how long each monitoring/reporting period is. Some projects may want or need shorter monitoring periods. We are considering requiring projects to verify within a certain number of years of the project validation, in which case that requirement would partially dictate the length of the initial monitoring and verification period. In addition, it is likely that methodologies applied by the projects will dictate required verification frequencies, as these will be specific to the project activity type and context.</p>
160	NGO	3.2	Define minimum requirement for public information	<p>set specific requirements for what information needs to be publicly disclosed about a project to support the process for "commercially sensitive" information described in this section.</p>	<p>The <i>Project Description Template</i> will set out the information that will be required from a project and that will be publicly disclosed. The definition of commercially sensitive information in the <i>Standard</i> describes the type of information that does not need to be publicly disclosed.</p>
161	Service Provider	3.2	Information for Public review	<p>The plastic waste management involves commercially sensitive information such as information on the sources and on vendors. However, these are essential for final realisation of plastic credits. These information can be verified by the validator and verifier and doesn't need not to be put up for public review. It is advisable to consider these aspects during the design of the the Project design document.</p>	<p>Projects can avoid having to disclose these details if they can demonstrate that the disclosure of these details could reasonably be expected to result in a material financial loss or gain, prejudice the outcome of a contractual or other negotiations or damage or enrich the person or entity to which the information relates.</p> <p>We will consider whether any other conditions should be added to the definition of commercially sensitive information as we learn from the pilot projects.</p>
162	Industry	3.2.1	What is the instructional text? Will it be shared for review? The project will have a lot of rules, so what is this additional (apparently mandatory) requirement? Same comment applies to all places where this "instructional text" is mentioned		<p>The instructional text included in the <i>Project Description Template</i> is to provide project proponents/developers with guidance on how to use the <i>Standard</i> and provide the necessary information in the <i>Project Description Template</i> to demonstrate that the project meets the Program requirements. The instructional text does not include additional requirements, rather it is to help the project proponent's/developer's understand the information that needs to be provided in its project description.</p> <p>The <i>Project Description Template</i> will be released upon the launch of the Program in early 2021 and is being tested by pilot projects in the meantime.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
163	Industry	3.2.2	We need clarity on what format the information will be made available, is the data 3rd party approved?		The information required to be provided by projects is listed in the Project Description Template with the exception of commercially sensitive information. The <i>Standard</i> explains the information that cannot be deemed commercially sensitive as it relates to aspects of the project that must be made transparent to the market. We will consider whether any other conditions should be added to the definition of commercially sensitive information as we learn from the pilot projects. All information provided by the project will be reviewed by the auditor at validation and verification. The complete data set used to demonstrate additionality, determine the baseline scenario, and estimate plastic waste recovery and recycling does not necessarily need to be made publicly available. However, the auditor will likely need to see the data in order to check that the plastic waste recovered and/or recycled was quantified correctly.
47	Industry	3.3	Include chemical recycling in the scope	It would be essential to include chemical recycling in the scope of this article to ensure you account for all recycling methods.	Chemical recycling is included in the scope of this Program and is under the recycling activities that are eligible in this Program. This will be made more explicit in the definition of recycling.
74	Service Provider	3.3	Clear delineation of ownership need to be defined	In the Plastic credit, two components are critical- the first one is the plastic waste collection/recovery and the second one is end-of-life scenario (recycling, use for recovery of oil). This section does not give clarity on accounting approach for each of the component of plastic value chain. In the plastic value chain many intermediaries are there. Establishing a traceability of the flow is important. However, there are no clarity on the same. In the absence of it there will be always scope of double counting of credits. It will also be appropriate to give certain weightage to each section of the value chain. Example a) An A recycler getting Y amount of plastic waste from Z sets of waste collectors/vendors, justify the proof and claim the credits. b) An A recycler getting Y amount from "P" NGOs who may also be looking into claiming the plastic credits. The P is supplying plastic waste to A, B, C. A will also be planning to claim the plastic credits for Y quantity that is supplied by P NGO. This may lead to ambiguity in the account procedures. In addition, plastic waste flows also happens cross country and inter state, the document has not given clarity on the same. This need to be elaborated in the documents.	The methodologies approved under the Program will include detailed requirements for how plastic recovery and recycling must be accounted. Note that both recovery and recycling credits can be issued under the Program. In the example you gave, the recyclers would only be able to issue <u>recycling credits</u> if they demonstrate that their recycling activities are additional. In your example, the recyclers would not receive <u>recovery credits</u> because it is the NGO that is responsible for the recovery of the material. Assuming the recovery is additional, the NGO would receive the <u>recovery credits</u> for that material. The NGO's recovery efforts may also be the reason that material is being recycled, meaning the recycler has not implemented a new activity to deem their operations additional. In that case, the NGO would also receive <u>recycling credits</u> for the material they collected that ended up recycled. Some activities that look like recovery activities may actually result in <u>recycling credits</u> , therefore the project proponent must carefully explain the specific project activities, select an appropriate methodology and carefully follow the accounting methods. Verra is developing examples to help projects understand how to account for material as it moves through the value chain.
76	NGO	3.3	Potential Double counting from multiple project activities - need a method to avoid How will you ensure that plastic being recovered from mismanagement is not double counted?		It should be made clear that the recovery and/or recycling resulting from each project activity can only be accounted for once. A requirement was added in Section 3.3.2 to make this clear. The methodologies approved under the Program will include detailed requirements for how plastic recovery and recycling must be accounted for each project activity, including avoiding double counting.
113	Service Provider	3.3	Please clarify whether the Project Proponent is required to have legal rights over all new project activity instances (i.e. similar to CME approach in CDM).	Suggest explicitly clarifying whether only one Project Proponent can have rights over the projects.	The registration and issuance process will be described in detail in a separate program document. The <i>Standard</i> provides the project requirements, whereas the <i>Program Guide</i> and other supporting documents will outline the process requirements.
114	Service Provider	3.3	It is not clear how this requirement relates to the Ownership status outlined on page 12, Line 23.		The ownership that must be demonstrated for each project activity instance per Section 3.3.13 is the same as the ownership outlined in Section 3.4. Project proponents must demonstrate that they have the legal right to control and operate the project activities. For grouped projects, this ownership must be demonstrated for each project activity instance although the project may have multiple project proponents.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
149	Other	3.3	It is important to clearly differentiate Multiple Project Activities from Grouped Activities, as well as what's considered a methodology and/or a group of activities that may include different methodologies. Specifically related with 3.3.2 point, when more than one methodology may be applied. Can Grouped Projects include Multiple Project Activities?		<p>Per 3.3.8, a grouped project can incorporate multiple project activities. The requirements set out in 3.3.1 - 3.3.2 will have to be followed for multiple project activities. The project description of a grouped project with multiple project activities will indicate which project activities may occur in each geographic area.</p> <p>Per 3.3.1 and 3.3.2, a project can use a methodology that allows more than one project activity to set up as a project with multiple project activities, or a project can have multiple project activities that are specified separately in the project description and reference the relevant methodology.</p> <p>Verra will revise the language in this section to make it easier to understand and will provide examples as appropriate.</p>
150	Service Provider	3.3	Program of Activities may be not suitable for recovery projects due to variability of circumstances	The likelihood of successfully capturing the scope and boundary of a recovery program (more than one activity in more than one location) is slim to none. The conditions are too variable in terms of recovery activities, with different local waste types, stakeholders, infrastructure and end of life solutions. Larger industrial scale recycling projects may lend themselves to be incorporated into programs; e.g., if a certain technology type is rolled out in various locations. Waste recovery projects however are too complex and different to be described in one common PD.	<p>We recognize that in many cases, it would not be feasible for multiple activity instances to form a single project based on varying activity circumstances. However, these requirements are designed to allow projects to achieve economies and efficiencies of scale and reduce the burden on project proponents in having to develop project documentation for several activity instances that are very similar. There may be some projects for which a multiple instance or grouped approach will significantly reduce their project development costs and allow them to scale the activities. Therefore, we recommend including these options in v1.0 of the <i>Standard</i>.</p> <p>Per 3.3.4, projects with multiple instances of project activities will be required to determine the baseline and demonstrate additionality for all project activity instances together, prior to project validation. This requirement will ensure that project activities with variable conditions will set up as separate projects instead of attempting to register as a single project. This check also exists for grouped projects, where the baseline scenario and additionality of future project activity instances depend on the conditions of the initial project activity instances</p> <p>While the <i>Standard</i> cannot prescribe the types of projects that can set up as a project with multiple project activity instances, the requirements for multiple project activity instances and grouped projects highlight that the multiple instances of a project are required to occur under similar conditions.</p>
151	Service Provider	3.3	Language clarification 'project activity instances	<p>It is not clear what the difference is between 'different activities', 'instances' and 'grouped projects'. The section on multiple instances of project activities and grouped projects are particularly hard to read and understand, and we must bear in mind that the vast majority of the standard users don't have English as first language.</p> <p>Assuming that an 'instance' is a 'project in a certain location' (regardless of the scope of activities), I suggest to use simpler language. 'Project in location X' is more comprehensible than 'instance'. I'd reword as follows e.g., "Projects may also be designed to include more than one project activity," "In addition, projects may be designed to include more than one location project activity instance", and "Determination of the baseline scenario and demonstration of additionality are based upon the initial project activity instances in location X" The word 'activity' doesn't have any relevance here and adds to this section not reading well. A project can have one or several activities, but that is not relevant when grouping them unless the activities become so different that they cannot be grouped in a single project description. This is going back to the comment I made above.</p> <p>Further, geodetic polygons as location markers are unlikely to be provided by any of the projects. This shouldn't be mandated. It contradicts 3.7 by the way, where it reads 'Where it is reasonable to do so'</p>	<p>The language in 3.3 will be revised for ease of use and will be supported by examples where appropriate.</p> <p>Verra will consider requiring that the geodetic coordinates of a project be provided "only when reasonable" if a majority of the pilot projects are unable to provide this information.</p> <p>The requirement for geodetic coordinates in 3.3 is separate from the requirement in 3.7.1 (2a), since the latter refers to providing geodetic coordinates for all project activity instances. Consistently throughout the <i>Standard</i>, projects are required to provide their geodetic coordinates, where projects with multiple project activity instances are required to provide this information for every instance only if reasonable.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
155	Industry	3.3	All this chapter below is difficult to understand. Illustration and examples would be very helpful here.		Verra will revise the language in Section 3.3 and include illustrative examples to explain the concepts, as appropriate, in v0.2 of the <i>Standard</i> .
156	Service Provider	3.3	Addition of new project proponents	What is the rationale for the two-year time limit?	The rationale for the two-year time limit when adding a new project activity instance with a new project proponent is that in theory the new activity instance with a new project proponent could be its own project and therefore should adhere to the validation deadline requirement for new projects.
157	Service Provider	3.3	The distinction between project activity and project activity instance is very confusing. This becomes more confusing when grouped projects are included. Some more examples of what this distinction is, including implications and how it works in practice would be helpful. How the PAI requirements are applied e.g. for additionality and and eligibility criteria is confusing and seems like it could become very complicated.	Alternatively simplify the requirements to eliminate PAI. remove project activity instance, or change the name and make it clearer what it is, how it relates to a project activity, why it is differentiated for things such as additionality, and how it relates to grouped projects (presumably grouped projects have grouped project activity instances?). If needed some figures or examples could be helpful to explain this new concept	Verra will revise the language in Section 3.3 to make it easier to understand and will provide examples as appropriate in v0.2 of the <i>Standard</i> .
158	Industry	3.3	Suggest to add examples. It's hard to understand what projects / activities will qualify (and align with the markets accordingly).		Verra will revise the language in Section 3.3 and include illustrative examples to explain the concepts, as appropriate, in v0.2 of the <i>Standard</i> .
164	Service Provider	3.3	Eligibility criteria have to be established in this framework	<p>If project proponents are interested in using the <i>Plastic Standard</i> and want to submit their projects, it has to be set out clearly from the start what the criteria are that deem a project to be eligible. What key criteria have to be presented/fulfilled for a project to be eligible? This is a simple inclusion or exclusion question that really needs to be enshrined into the high level program and the standard, and cannot be pushed down the line into a methodology.</p> <p>The 3RI does value the project proponents time and their own time so this has to be clear from the outset.</p> <p>Eligibility criteria are safeguarding the core principles and the current scope of the Program, such as 'technological and material scope', 'integrity', 'conservativeness', 'transparency', 'comparability over time', 'do no harm', etc. Criteria like "Use the technologies or measures specified in the project description." are not relevant to eligibility; this is a compliance criterion that will be verified during verification to determine whether or not a project is eligible to issue credits or not.</p>	<p>Project activities must be supported by a methodology approved under the Program. Each methodology includes applicability conditions that must be met by a project in order for it to apply the methodology and be eligible under the Program. Each methodology may include conditions that must be met by all activities within a certain activity category (e.g., recovery) as well as conditions that must be met by a specific activity type within the category (e.g., municipal recovery infrastructure).</p> <p>The high level scope of the Program is recovery and recycling of the plastic types listed in Section 2.1 and any project that is implementing an activity within the scope is eligible under the Program. We will consider whether and how to provide more details on the eligible activities in Section 2.1 of v0.2 of the <i>Standard</i>. However, the list of activities would need to remain high level enough to allow very specific project activities to be eligible under the Program even if the specific activity is not listed in the scope.</p>
186	Service Provider	3.3	All the requirements included in regulatory surplus are not realistic. Compliance with laws is reasonable, however statutes and other regulatory frameworks should be treated as a plausibility check or spot check		There may be laws, statutes or regulatory frameworks mandating project activities. However, often times these laws, statutes and frameworks are not enforced. If that is the case, projects can simply explain that there is no enforcement and remain eligible under the Program. The lack of enforcement must be confirmed through a simple check by the auditor during validation.
205	NGO	3.3	No project should be accepted that encourages informal waste management or the inclusion of waste pickers in an INFORMAL manner. These individuals are highly vulnerable, get underpaid, don't have safety equipment, are working in dangerous locations and include child labour. Projects should only be accepted that formalize these waste pickers into their operations, provide steady employment, required safety equipment and employed on the prevailing minimumum wage at the very least.		The safeguard requirements in the <i>Standard</i> ensure that projects are required to identify and mitigate all potential health and safety impacts. Projects are also required to avoid any instances of forced and indentured labor, and to identify and mitigate all child labor. The safeguards also require that all project actors receive at least a regionally-determined living wage. These requirements will ensure that projects with informal waste management or waste pickers, where the project actors are underpaid or working in dangerous conditions, are not accepted by the Program. The safeguard requirements are designed to protect the rights of project actors and provide a pathway for projects to identify and mitigate negative impacts based on what is reasonable and relevant in the project area.
240	Service Provider	3.3	Scalable project models		Verra will take this suggestion into account as we develop the assessment requirements, which will be included in the <i>Plastic Standard, v0.2</i> and the <i>Program Guide, v0.1</i> documents, as part of the second public consultation. More specifically, we are considering different assessment requirements for micro-, small- and large-scale projects that reflect their different needs, operations and geographical contexts. We will also consider different validation/verification requirements for new grouped project instances.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
159	Industry	3.3.2(2a)	The standard should include a positive list for activities that don't need to demonstrate additionality.		All projects must demonstrate additionality. However, there are several methods for demonstrating additionality allowing for flexibility in that exercise. The methodologies developed under the Program will make use of positive lists for certain project activity types, as applicable. Informal collection activities are likely to appear on a positive list for demonstration of additionality and Verra aims to establish performance benchmarks for informal collection projects to use in baseline setting.
72	Service Provider	3.3.2(3)	Double-counting safeguard: "The criteria and procedures relating to all other aspects of the methodologies may be combined."	Suggest renumbering this as 4 and adding as #3, "Each plastic reduction shall be credited under only one methodology."	It should be made clear that where multiple methodologies are applied, the recovery and/or recycling resulting from each project activity can only be accounted for once. A requirement will be added to make this clear.
152	Service Provider	3.3.7	why is the determination of baseline scenario and additionality based on initial project activity instances rather than project activity? Note in 3.3.9 it refers to determining the baseline scenario for a "project activity", not a "project activity instance"; but then in 3.3.10 additionality is again referred to initial "project activity instance". Is this an intentional distinction, or typo? If an intentional distinction the nuances and implications are unclear		This is an intentional distinction. Verra will determine how this distinction can be explained further in the requirement. The baseline scenario is meant to represent what would happen in the designated geographic area in the absence of the project activity. Therefore, the determination of the baseline scenario is a hypothetical exercise in which the particulars of the proposed project activity instances should not be considered, which is why the more generic term 'project activity' is used. All instances in a grouped project must have the same baseline scenario to demonstrate that in the absence of the project activity, the same status quo would apply to all instances. For the demonstration of additionality, projects are required to show specifically why credit financing is necessary to support the project activity instances requesting registration. The demonstration of additionality can vary among project activity instances because localized conditions can influence how project activity instances are implemented or their need for financing, even within an area with the same baseline scenario. For this reason additionality is more specific to individual instances and demonstrations of additionality can vary between instances of the same project.
153	Service Provider	3.3.12	why do grouped projects have eligibility criteria for project activity instances rather than project activities?		Grouped projects can contain multiple project activities, however project activities cannot be added subsequent to validation. On the other hand, grouped projects allow for project activity instances to be added subsequent to validation, so the eligibility criteria will ensure that the new project activity instances are consistent with the existing project activity instances. The purpose of eligibility criteria for new project activity instances can be found in Section 3.3.12.
154	Service Provider	3.3.13	Can a list of potential locations for a new project activity be provided, where the project activity will eventually only take place in one or two locations? Since onground implementation changes rapidly for plastic recovery programs, it is advisable to allow for multiple locations out of which one can be chosen for project activity and verified at a later stage to allow flexibility.		Yes, the grouped project approach allows for this. Section 3.3.13 addresses the inclusion of new project activity instances in a grouped project scenario. Grouped projects are intended to address exactly the situation that you describe: where additional project activity instances may be added to the project after validation. The Standard sets out in Section 3.3.6 that "Grouped projects shall have one or more clearly defined geographic areas within which project activity instances may be developed." Those areas do not all have to host project activities at the project's validation.
241	Service Provider	3.3.13 (3)	We note that additional project activity instances shall enable sampling by the validation/verification body. This requirement may act as a financial barrier to the inclusion of additional recovery or recycling projects, in the case of small, informal or remote projects.	Consider approaches to avoid or reduce the cost burden associated with validation/verification of additional project activity instances on small, informal or remote projects.	Verra will take this suggestion into account as we develop the assessment requirements, which will be included in the <i>Plastic Standard, v0.2</i> and the <i>Program Guide, v0.1</i> documents, as part of the second public consultation. We are considering different assessment requirements for micro-, small- and large-scale projects that reflect their different needs, operations and geographical contexts. We will also consider different validation/verification requirements for new grouped project instances.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
27	Service Provider	3.4	<p>What matters in the context of 3RI packaging/plastic waste recovery and/or recycling projects is the 'Right to credits', not necessarily the concept of 'ownership'. Other than in the CDM/VCS and alike, the ownership of a piece of land or a right to operate a facility doesn't necessarily grant rights to credits.</p> <p>The 'Rights to credits' need to be established between the - typically multiple- stakeholders that co-fund or co-sponsor a project.</p> <p>Ownership plays a role when it e.g., involves a MRF or other facility where packaging/plastic waste gets segregated or recycled.</p> <p>Further, some projects may receive only initial seed funding by private entities that initially may want to claim rights to credits to recover some of their CAPEX or OPEX. That doesn't mean though that they will remain the authorised project proponent for the entire crediting period. These rights may need to be transferred to an entity that takes over after initial set-up of a few years, once the private company hands the project over to e.g., a community. It will then be the community which will require the rights to credits and respective finances, in order to sustain the project.</p> <p>Ownership is not relevant for recovery projects such as beach clean-ups, and other recovery activities in nature and public spaces, incl. landfills.</p>	Right to credits instead of ownership	<p>The right to credits (and credit allocation) will need to be determined by the project proponent and will not be prescribed by the Plastic Accounting Program. The concept of right to credits will be explained in the <i>Plastic Accounting Program Guide</i>.</p> <p>The demonstration of ownership is important to ensure that projects have the legal right to operate. The way in which projects demonstrate ownership will vary. The <i>Plastic Standard</i> acknowledges this by allowing for demonstration of ownership via locally available/applicable means, should the other options to provide evidence of ownership listed in the <i>Standard</i> not be applicable.</p>
28	Service Provider	3.4	<p>Waste ownership</p> <p>Ownership of credits is not defined in the document – how would this be considered in different scenarios and at different stages of the value chain e.g. between municipalities vs. waste traders vs. NGOs vs. private waste operators vs. recyclers. And also between the “transformation” project vs. “long-term operations” for a particular waste system.</p>		<p>The right to credits and any necessary allocation of credits to participating parties will need to be determined by the project proponent at the start of the project, and will not be prescribed by the Plastic Accounting Program. The concept of right to credits will be explained in the <i>Plastic Accounting Program Guide</i>.</p>
29	Service Provider	3.4	<p>It may happen that recovery agencies/collectors of plastic waste would like to claim the ownership of the credits. The same plastic waste may go to vendor who will recycle it and would like to claim credit. The document is not clear who will be the owners of the credits.</p>	Provide clarity on ownership	<p>The right to credits and any necessary allocation of credits to participating parties will need to be determined by the project proponent at the start of the project, and will not be prescribed by the Plastic Accounting Program. The concept of right to credits will be explained in the <i>Plastic Accounting Program Guide</i>.</p> <p>A unit of material that has been demonstrably recovered and recycled can have both recovery and recycling credits issued on it. In the example given, where the same material is recovered by one party and recycled by another, the two parties may choose to operate under one project and agree how the credits will be allocated. Alternatively, the activities could be split into two projects and each project proponent may choose to allocate credits, or the revenue generated by the sale of credits, to entities involved in the project. Either way, these arrangements must be agreed to by the relevant parties at the start of the project.</p>
30	NGO	3.4	<p>Do you anticipate or could the standard accommodate joint ownership scenarios between multiple parties who invest in and implement a project? As an example, if a grant-making entity provides funding that is matched by a project implementing entity, could their shared project/credit ownership?</p>		See response to Comment #29.
116	Industry	3.4.1	<p>Why services agreements are not captured in the options of ownership? Also, the contractual relationship can be direct or indirect (with some other players in the chain) and that is not</p>		Thank you for these suggestions. We will revise Section 3.4.1 in v0.2 of the <i>Standard</i> to include service agreements and both direct and indirect contractual relationships.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
117	Industry	3.4.1(5),(6)	We don't agree with the requirement of "irrevocable". What happens if the entity responsible for the project wants to change supplier? Or if something goes wrong with the project?		<p>The intent of 3.4.1(5) is to prevent projects from demonstrating ownership with an agreement that could be revoked during the implementation of the project. We will revise Section 3.4.1 for clarity in v0.2 of the <i>Standard</i>, including potentially revising "irrevocable" to "legally binding".</p> <p>Where the project proponent changes the supplier of material, a revision would need to be made to the project description and all relevant requirements would need to be met by the new supplier. Anytime something goes wrong with a project (i.e., implementation does not happen according to the Project Description) the project proponent must identify the issue, continue monitoring project activities and provide justification for how the issue was addressed. If there is a change in ownership, it must be justified and proper ownership must be demonstrated through a project description deviation. Requirements for project description deviations will be included in v0.2 of the <i>Standard</i>.</p>
120	Industry	3.4.1(3),(4)	It's not clear what "contractual right" in a process means from a legal perspective. Same comment applies to all similar references		We recognize these terms and requirements are not clear. We are working with our legal advisors to see how we can simplify the language and/or provide more clarity in Section 3.4.1 in v0.2 of the <i>Standard</i> .
121	Industry	3.4.1(5)	Unclear: "which vests project ownership in the project proponent"		See response to Comment #120.
119		3.4.1(5),(6)	"irrevocable" should be deleted as all contracts will have some form of termination clauses which could be considered to be revokable.	Replace "irrevocable" with "legally binding"	<p>See response in Comment #119.</p> <p>We will revise Section 3.4.1 for clarity in v0.2 of the <i>Standard</i>, including potentially revising "irrevocable" to "legally binding".</p>
118	Industry	3.4.1(8)	Why only government		The particular option (3.4.1(8)) should be used when ownership and right to operate must be granted by a government entity. The other options listed in Section 3.4.1 provide options for ownership and the right to operate being granted from entities other than the government. We will revise Section 3.4.1 for clarity in v0.2 of the <i>Standard</i> .
122	Industry	3.4.1(9)	"...with an organization that can demonstrate proof of ownership (as listed above) on behalf of the project actors." In that case who goes through the process? The "sponsor" of the implementation organization? How does the sponsor get the credits in that case?		<p>In this case, the "sponsor" would need to be listed as the project proponent, or one of the project proponents, and put an agreement in place with the project actors as to who has the right to the credits. The sponsor may not need or require that they maintain the right to the credits.</p> <p>The right to credits (and credit allocation) will need to be determined by the project proponent and will not be prescribed by the Plastic Accounting Program. The concept of right to credits will be explained in the <i>Plastic Accounting Program Guide</i>.</p>
250	Other	3.5	Proposed start date seems appropriate and practice in view of the validation deadlines		We will take this position into account as we consider the proposed start dates further.
252	Service Provider	3.5	In response to Verra's question in Section 3.5: Yes. However, we seek clarification about type of documentation required to demonstrate project operation in case of a retroactive project.	Propose adding guidance on how the start date can be addressed in informal and/or small community projects.	<p>To demonstrate project operation retroactively, in accordance with the start date requirements, projects could provide receipts for the sale or purchase of materials or other similar sources of evidence to prove the project was operational from the start date. This information could be further confirmed through stakeholder interviews during the validation and verification.</p> <p>We will consider including guidance for the start date requirements for small scale and informal projects once we have established methods for demonstrating additionality and setting baselines for such projects. For example, certain activities may appear on a positive list and any guidance provided would need to reflect that.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
254	Other	3.5	What happens when a waste picker association has been working in a city recovering plastic for many years, but at some point (let's say from 2018 onwards) an external company begins to work with them, helping them improve their waste collection systems? What's the project start date? 2018 or earlier?		In that example, it is likely that the project start date will be in 2018 if that is when the project was able to increase their recovery of plastic waste. In other words, the start date should be aligned with the implementation of the activity that can be deemed additional. If the project implemented activities that can be deemed additional after 1 January 2016 and before 2018 when the external company joined, the start date could be prior to 2018. A project activity is additional if it can be demonstrated that the activity results in recovered or recycled plastic waste that is in excess of what would be achieved under a 'business-as-usual' scenario and the activity would not have occurred in the absence of the incentive provided by the plastic crediting mechanism.
255	Service Provider	3.5	Financial self sustainability	3.5.2. specifies that "the project could not be sustained in absence of revenues from, the sale of resulting plastic unit", specifically for projects with the starting date between January 2016 and December 2018. What are the implications of this clause for currently self-sustainable projects that may become unsustainable, e.g. because village fund contributions were decreased? Does this self-sufficiency clause also apply for projects starting after the December 2018?	This is an important point. We will discuss and revise Section 3.5 in v0.2 of the <i>Standard</i> (as necessary) to clarify whether projects that are currently self-sustainable but may become unsustainable are eligible under the Program, regardless of their start date (after 1 January 2016).
256	NGO	3.5	Clarification needed - when do credits start being generated?	Need a clarification on when credit generation starts for projects, is it upon project approval?	In many cases, projects will not complete validation and be registered under the Program until after the projects start date and start of the crediting period. Note that the project must complete validation within a specific timeframe from the project start date, per Section 3.5.3 and 3.5.4. However, projects can generate credits for recovered and/or recycled waste beginning from the project start date and start of its crediting period. The start date is the date on which the project began recovering or recycling plastic waste, so it must be linked to the specific project activity. The crediting period is the time period for which plastic waste recovered and/or recycled by the project is eligible for issuance as credits. Projects can choose to start their crediting period after the project start date. For example, in cases where there is a ramp up time between when the project starts recovering and/or recycling plastic waste and when it reaches full capacity the project may choose to start the crediting period some time after the official project start date. Section 3.6 of the <i>Standard v0.2</i> will be revised for clarity.
257	NGO	3.5	Wording clarification on requirement that project could not be sustained without revenue from sale of plastic units	Is the intention of the clause in section 3.5.2 "that the project could not be sustained in the absence of revenues from the sale of resulting plastic units" to ensure that projects would not be able to sustain themselves economically without funds from a third-party? By specifically mentioning "revenues from the sale of resulting plastic units" all projects launched after 2016 but before plastic credits exist are technically not eligible.	This is an important point and the requirement as written is not clear. We will discuss and revise Section 3.5 in v0.2 of the <i>Standard</i> (as necessary) and clarify whether projects that are currently self-sustainable but may become unsustainable are eligible under the Program, regardless of their start date (after 1 January 2016).
258	Service Provider	3.5	start date	3.5.2 For projects with a project start date between 1 January 2016 and 31 December 2018, the project proponent shall provide evidence that the project was undertaken in order to recover or recycle plastic waste and that the project could not be sustained in the absence of revenues from the sale of resulting plastic units. This is known that no one has ever envisaged about plastic credits as of today. Bringing in this criteria will lead to falsification of statement by many project developers. I recalled this will lead to scenario where CDM project has received lots of criticism on the similar line. You must need to do away with it. Requesting these requirements may force many project developer in submitting falsified statement which will create a question mark on credit worthiness. Starting dates as 1st Jan 2016 is appropriate.	Yes, this requirement is confusing and could lead to false statements. We will discuss and revise Section 3.5 in v0.2 of the <i>Standard</i> (as necessary) and clarify whether projects that are currently self-sustainable but may become unsustainable are eligible under the Program, regardless of their start date (after 1 January 2016).

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
260	NGO	3.5	Some recovery projects might have been in place for years and provide an important service which should be supported by the sale of Plastic Units.		We will take this position into account as we consider the proposed start dates further. We agree that at least some portion of projects that started their activities prior to the launch of the Program should be eligible for crediting under the Program. However, we must ensure that all credited activities are truly additional in order to achieve the Program's objective to support and scale-up activities that increase plastic waste recycling and/or recovery from the environment.
261	Other	3.5	Yes, the proposed project start date of 1 Jan 2016 is reasonable.		N/A
262	Service Provider	3.5	Start Date Question	Yes, we believe that 01 Jan 2016 is reasonable as it can help many projects which are currently suffering to meet their breakeven cost due to unforeseen challenges. As per our experience, an effective and well developed plastic waste recovery and recycling project generally needs upto 6-7 years for financial breakeven and further sustainability. Therefore, start date upto last 5 year is appropriate and practical.	We will take this point into account as we consider the proposed start dates further.
264	Service Provider	3.5	Suggest rewording: "that the project could not be sustained in the absence of revenues from the sale of resulting plastic units."	Rather than past tense, allow for financial recovery in the future too. Rewording "that the project could can not be sustained in the absence of revenues from the sale of resulting plastic units."	Yes, this requirement is confusing and could lead to false statements. We will discuss and revise Section 3.5 in v0.2 of the <i>Standard</i> (as necessary) and clarify whether projects that are currently self-sustainable but may become unsustainable are eligible under the Program, regardless of their start date (after 1 January 2016).
6	Service Provider	3.5.2	Referring to 3.5.2 - All recovery of plastics is not sustained through their sale of plastic units	In some cases, additionality could be provided with these plastic units. For exp, currently low value plastics such as MLP (Multilayer Plastics) recovery and recycling is sustained through Extended Producer Responsibility requirements. Though the projects can sustain by themselves, allowing plastic units in such cases will increase the limited number of vendors working on these projects, take out the risk of working capital during project, allow more economic value for these plastics bringing them into the formal supply chain and allowing for better adoption.	Waste Recovery Credits or Recycling Credits can only be issued by projects that have met the requirements of the Plastic Accounting Program, including the demonstration of additionality.
251	Service Provider	3.5.2	Will there be any safeguard against projects which may already exist, dissolve and then re-establish themselves with the aim of demonstrating a zero project activity baseline under which to issue credits under the Plastic Accounting Program? (i.e. not producing a net increase in plastic waste recovered or recycled)		Verra is prioritizing standardized approaches for demonstrating additionality and setting the baseline in the development of methodologies. Where standardized additionality tests and baseline setting is required, such projects would still be required to demonstrate additionality according to the standardized approach and would not be able to assume a zero baseline unless it was deemed appropriate according to the applicable methodology. During the methodology development process and based on the standardized approaches used, we will consider whether further safeguards are necessary to prevent this from occurring.
263	Industry	3.5.2	1. How can a project proponent from 2016 or 2018 prove that the project activity needs credit finance if the project started the crediting mechanism was created? 2. This concept excludes voluntary waste-picking initiatives and waste pickers cooperatives as there's no long-term assessment of revenues so there will be no way to prove the need of credit finance in many situations.		1. This requirement is confusing and could lead to false statements. We will discuss and revise Section 3.5 in v0.2 of the <i>Standard</i> (as necessary) and clarify whether projects that are currently self-sustainable but may become unsustainable are eligible under the Program, regardless of their start date (after 1 January 2016). 2. The intent of this requirement is not to exclude waste picker initiatives. Rather the intent is to ensure that all credited activities are truly additional in order to achieve the Program's objective to support and scale-up activities that increase plastic waste recycling and/or recovery from the environment. We will take this point into consideration as we develop the methodologies for informal collection projects to ensure we are not inappropriately excluding such projects via the start date requirement.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
253	Service Provider	3.5.2	We note that for projects with a project start date between 1 January 2016 and 31 December 2018, the project proponent shall provide evidence that the project was undertaken in order to recover or recycle plastic waste and that the project could not be sustained in the absence of revenues from the sale of resulting plastic units. Please clarify what documentation is required to prove this. This requirement may be challenging for projects which may have started on an informal basis (e.g. through donations) or experiencing pauses in the recovery and/or recycling activity.	Please provide examples of the documentation required to demonstrate project start date between 1 January 2016 to 31 December 2018. Please clarify whether projects that have experienced pauses in recovery/recycling (i.e. where sustained activity has not been possible due to financial reasons) would be eligible and under what conditions.	To demonstrate project operation retroactively, in accordance with the start date requirements, projects could provide receipts for the sale or purchase of materials or other similar sources of evidence to prove the project was operational from the start date. This information could be further confirmed through stakeholder interviews during the validation and verification. Projects that have experienced pauses in activities due to financial restrictions could be required to describe the circumstances during the next verification, without it affecting project eligibility. As long as the project continues to monitor its activities a pause in activities should not exclude the project from continuing.
31	Other	3.6	Why is it a 7-year period? Why is it renewable for 3 different periods for a total of 21 years? What happens if an applicant exits the program? Does it get all lost? Is the crediting period subject to the length of the project in any way? For instance, if my project is meant to last for 4 years but after that the activity of the project continues independently from the institution that set it up (a foundation executes a project that sets the basis for an activity that waste picker associations will develop in the long term), is the plastic from the project still eligible for the next 3 years completing the 7 years of crediting period? Or will the crediting period immediately end and therefore the waste picker association will have to re-apply? Would the waste picker association be able to re-apply if it stops having the nature of a finite project and starts being a regular economic activity?		Based on feedback received from those working on the ground to implement recovery and/or recycling activities, seven years is the most appropriate crediting period length to ensure the validity of the baseline throughout the period while making the the cost and effort required in the project registration and implementation process worthwhile. There may be some project activity types, such as collection of plastic waste in the ocean, that maintain dependence on credit revenues for a longer period of time. Until we know more about the speed at which the waste management sector can transform, it is more conservative to include limits on crediting period renewals. Where Verra finds that certain activities need support beyond 21 years, the Program rules could be updated to accommodate the project activity types that remain truly additional. Although it is more complicated to have two crediting period options (i.e., seven years, twice renewable or ten years fixed), Verra sees these two options as the best way to address the various points that have been made regarding crediting period length. As long as the project continues to operate and monitor the recovery and/or recycling of plastic waste the project can issue credits through the full crediting period. The original project proponent must ensure that proper ownership of the project and resulting credits is transferred to the new project proponent. Alternatively, a project could have multiple project proponents and agree on how the credits will be allocated among the proponents through the lifetime of the project.
32	Service Provider	3.6	Project Crediting Period Length	It may not make sense to mirror the carbon market with such limits. If the baseline is reset and additionality fully reevaluated, perhaps there should not be a limit on renewals.	Currently, the <i>Standard</i> does not require a full reassessment of additionality at crediting period renewal. The Program could allow for unlimited crediting period renewals as long as the project continues to be additional and update its baseline. However, unlimited crediting period renewals may disincentivize the transformation of the waste management sector if projects continue to rely on revenues from the sale of credits. There may be some project activity types, such as collection of plastic waste in the ocean, that maintain dependence on credit revenues for a longer period of time. Until we know more about the speed at which the waste management sector can transform, it is more conservative to include limits on crediting period renewals. Where Verra finds that certain activities need support beyond 21 years, the Program rules could be updated to accommodate the project activity types that remain truly additional.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
32a	Service Provider	3.6	I agree to a great extent and have one question for you that may need consideration if no limit to renewals would be applied. For community projects: Do you think that a perpetual dependency on external cash flow from credits could stymie communities' growth in terms of independence and sustainable business model adaptation? I personally fear that the never-ending dependency on external credits to make a project sustainable may be counterproductive in the long term, and finding sustainable solutions to the packaging/plastic waste crisis may not be sought after as long as this financing model through the credits keeps going open-ended.		Verra agrees that unlimited crediting period renewal, and therefore unlimited dependency on credit revenues, could be a barrier to transforming the waste management sector. However, crediting periods do serve as a form of security for projects and the Program should attempt to align crediting period length with the nature of the credited activities.
32b	Service Provider	3.6	Thank you for your feedback. I understand what you're saying in terms of creating a dependency on credits. However, another way to think of this is that some activities are always dependent on simply being paid for. Particularly with regard to recovery of plastic waste, we're talking about a form of waste collection. While I pay for the weekly collection of waste from my home, there is no one to pay for collection of plastic waste in the ocean. Credits are a way of paying for that. For recycling technologies, I can see your point more, but I think the problem is too great to be overly concerned with providing too much support.		Currently, the <i>Standard</i> does not require a full reassessment of additionality at crediting period renewal. The Program could allow for unlimited crediting period renewals as long as the project continues to be additional and update its baseline. However, unlimited crediting period renewals may disincentivize the transformation of the waste management sector if projects continue to rely on revenues from the sale of credits. There may be some project activity types, such as collection of plastic waste in the ocean, that maintain dependence on credit revenues for a longer period of time. Until we know more about the speed at which the waste management sector can transform, it is more conservative to include limits on crediting period renewals. Where Verra finds that certain activities need support beyond 21 years, the Program rules could be updated to accommodate the project activity types that remain truly additional beyond 21 years.
33	NGO	3.6	McKinsey.org believes that 10 years fixed makes sense given this is the typical period of time that it takes to depreciate the type of assets many recycling projects would purchase to increase capacity. Would additional infrastructure that is included by the program to recover/recycle additional plastic waste from the environment reset the crediting period? For example, if in year 5 the project adds a belt to its recycling facility would this investment effectively reset the crediting period to be 10 years fixed from the date of the purchase of the belt?	Crediting period - clarification needed re the effect additional investments have on the crediting period	No, the crediting period for the project would remain in effect and apply to any new capacity within the project. In the example given, the project would likely need to include a project description deviation in the next verification to add the increased capacity to the project. It may be necessary to demonstrate that the added capacity does not impact the baseline scenario or additionality demonstration, but the crediting period would stay the same for the project. Note that rules and requirements for project description deviations were not included in v0.1 of the <i>Standard</i> , but will be developed for v0.2.
34	Service Provider	3.6	The business viability of the plastic waste business model is mostly assessed through a timeline of 5 to 10 years. In addition, the plastic waste market dynamics are changing very rapidly.	It will be advisable to limit the crediting period to fixed credit period of 7 years or renewable crediting period of 5 *2 =10 years.	Based on feedback received from those working on the ground to implement recovery and/or recycling activities, seven years is the most appropriate crediting period length to ensure the validity of the baseline throughout the period while making the the cost and effort required in the project registration and implementation process worthwhile. Project proponents who are reasonably certain that the project activity will not be additional through multiple crediting periods or that the project scenario will not result in plastic recovery and/or recycling beyond the updated baseline scenario, may choose a ten year fixed crediting period as opposed to one seven-year crediting period. There may be some project activity types, particularly those focused on recovery, that maintain dependence on credit revenues for a longer period of time or indefinitely. For these project activity types, it is important to allow for crediting beyond an initial seven year period as long as the baseline remains valid or is updated.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
35	Service Provider	3.6	<p>We understand that crediting period is applied at project level and choice of crediting period can vary depending on the lifetime of the project. Hence, both fixed and renewal crediting period is suitable. However, our understanding is that Plastic-Waste and related crediting mechanism is an emerging concern, being evolved with time.</p> <p>In the meantime, good effective projects are limited in numbers due to lack of attention, regulation, financial support and other challenges in the market etc.</p>	<p>One of the possible scenarios could be that renewal crediting period can be termed upto 28 years (say 7 yrs X 4) so that selected projects can at least get support for longer period of time to bring visible change above the business as-usual-scenario. However, it is to be sub-claused that lifetime or the technical durability of the project must be demonstrated in each renewal such as crediting ends at the end of the project lifetime or on expiry of the technical operation, whichever occurs first.</p>	<p>Based on feedback received from those working on the ground to implement recovery and/or recycling activities, seven years is the most appropriate crediting period length to ensure the validity of the baseline throughout the period while making the the time and effort required in the project registration and implementation process worthwhile. There may be some project activity types, such as collection of plastic waste in the ocean, that maintain dependence on credit revenues for a longer period of time. Until we know more about the speed at which the waste management sector can transform, it is more conservative to include limits on crediting period renewals. Where Verra finds that certain activities need support beyond 21 years, the Program rules could be updated to accommodate the project activity types that remain truly additional.</p>
36	Service Provider	3.6	<p>Retroactive crediting and start date of crediting period - must be defined specifically</p>	<p>It needs to be properly demonstrated which date would be considered as start date of crediting. Say, will it be the date of plastic waste recovery or start of the recycling process or the date of production of recycling products, or else?</p>	<p>The start date is the date on which the project began recovering or recycling plastic waste, so it must be linked to the specific project activity. Projects can choose to start their crediting period after the project start date. For example, in cases where there is a ramp up time between when the project starts recovering and/or recycling plastic waste and when it reaches full capacity the project may choose to start the crediting period some time after the official project start date.</p>
37	Service Provider	3.6	<p>Validity of baseline throughout the reporting period</p>	<p>Is there (sufficient) evidence to sensibly assume that baselines roughly remain valid for up to 10 years? Otherwise consider an update of baselines every 5 years.</p>	<p>Based on feedback received from those working on the ground to implement recovery and/or recycling activities, seven years is the most appropriate crediting period length to ensure the validity of the baseline throughout the period while making the the cost and effort required in the project registration and implementation process worthwhile. Project proponents who are reasonably certain that the project activity will not be additional through multiple crediting periods or that the project scenario will not result in plastic recovery and/or recycling beyond the updated baseline scenario, may choose a ten year fixed crediting period as opposed to one seven-year crediting period.</p>
38	Service Provider	3.6	<p>Definition of start of crediting period</p>	<p>The beginning of the project crediting period is not defined in the standard. A clause could be added to specify that the crediting period starts upon approval of the project</p>	<p>The start date is the date on which the project began recovering or recycling plastic waste, so it must be linked to the specific project activity. Projects can choose to start their crediting period after the project start date. For example, in cases where there is a ramp up time between when the project starts recovering and/or recycling plastic waste and when it reaches full capacity the project may choose to start the crediting period some time after the official project start date.</p>
39		3.6	<p>The crediting period options proposed seem reasonable</p>		<p>N/A</p>
40	NGO	3.6	<p>Recovery projects do not lose value over time and should be supported indefinitely.</p>		<p>Unlimited crediting period renewals may disincentivize the transformation of the waste management sector if projects continue to rely on revenues from the sale of credits. There may be some project activity types, particularly those focused on recovery, that maintain dependence on credit revenues for a longer period of time or indefinitely. Until we know more about the speed at which the waste management sector can transform, it is more conservative to include limits on crediting period renewals. Where Verra finds that certain activities need support beyond 21 years, the Program rules could be updated to accommodate the project activity types that remain truly additional.</p>
145	Service Provider	3.6	<p>Why does the validity if the original baseline play a role upon renewal? "validity of the original baseline scenario shall be demonstrated"</p>	<p>I don't understand why a project proponent shall demonstrate the validity of the original baseline scenario if she/he wishes to apply for a renewal. The second crediting period should establish the baseline at the moment of time that the first one ends, as this will a) honour the principle of conservativeness and b) reflect realistically the advancements made in the MSW sector in the country/project location. The surplus that a project could claim in the second crediting period will logically be less than in the first. If that wasn't the case, it'd be based on the assumption that overall conditions in the MSW sector didn't improve at all in seven years. That would be a sad assumption.</p>	<p>We agree with this point. Section 3.6.3(2)(b) states that where the original baseline scenario is no longer valid, the current baseline scenario must be established. In other words, the baseline scenario at the time of crediting period renewal must be confirmed whether it is the same as the previous baseline scenario or has changed.</p> <p>To put more of an emphasis on the assumption that the waste management conditions will improve over time, we will consider reordering the points listed under Section 3.6.3(2).</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
139	Service Provider	3.6	We note the maximum proposed crediting period of 21 years. We also note that the project boundary (as per page 16, Line 21) shall be defined in the project description. In the case of long-term projects, we therefore assume that the project boundary could represent a very large geographical range (e.g. an entire country or island) to account for growth or changes in the project boundary.	Please clarify the intention behind a long-term (e.g. 21 year) crediting period, and if corresponding requirements should be adapted for projects seeking this crediting period.	<p>The project boundary can be set so that the same baseline applies to the entire region over time. While there are currently no restrictions on the geographical range of the project boundary, activities in different areas might warrant being set up as independent projects and using more regionally specific baselines. Should a project want to define a boundary with a large geographical range, an appropriate baseline recovery/recycling rate will have to be determined accordingly.</p> <p>The intention behind the long-term crediting period option is to provide projects with the opportunity to receive credit financing for a total of 21 years, subject to a partial reassessment of additionality and a demonstration of the validity of the original baseline scenario/the determination of a new baseline scenario every 7 years. The requirements for project boundary are not subject to review for crediting period renewal, as long as the requirements for crediting period renewal are met (i.e., the boundary may be a factor in updating the baseline scenario, but there is not a specific requirement to update the boundary during a crediting period renewal).</p>
259	Service Provider	3.6	Retroactive crediting and start date of crediting period - must be defined specifically	The Standard must include definition or clarity related to the provision of retroactive crediting period for projects. Will it be linked with the start date of the project or irrespective of start date of the project, crediting period would be defined separately? Such clarity must be included.	<p>In many cases, projects will not complete validation and be registered under the Program until after the projects start date and start of the crediting period. Note that the project must complete validation within a specific timeframe from the project start date, per Section 3.5.3 and 3.5.4. However, projects can generate credits for recovered and/or recycled waste beginning from the project start date and start of its crediting period. The start date is the date on which the project began recovering or recycling plastic waste, so it must be linked to the specific project activity. The crediting period is the time period for which plastic waste recovered and/or recycled by the project is eligible for issuance as credits. Projects can choose to start their crediting period after the project start date. For example, in cases where there is a ramp up time between when the project starts recovering and/or recycling plastic waste and when it reaches full capacity the project may choose to start the crediting period some time after the official project start date.</p> <p>Section 3.6 of the <i>Standard v0.2</i> will be revised for clarity.</p>
187	Industry	3.6.3 (1)	What does regulatory surplus mean?		<p>Demonstration of regulatory surplus means that a project has to demonstrate that it is not mandated by any law, statute or other regulatory framework meaning the activity should already be occurring according to the law. In some cases, the law, statute or regulatory framework is not enforced. In that case, projects can demonstrate that the law/statute/framework is not enforced and remain eligible under the Program.</p> <p>Verra will include a definition of regulatory surplus and/or provide clarification in Section 3.6.3 in v0.2 of the <i>Standard</i>.</p>
41	Industry	3.6.3 (2a)	Who will the validity of the original baseline scenario be assessed by? Can this be defined?		The project proponent must assess the original baseline scenario to determine if it is still valid by following the relevant sections of the applicable methodology. An auditor will also assess the validity of the original or updated baseline scenario during validation.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
42	Industry	3.6.3 (3)	Not clear: Such a validation report shall be issued after the end of the (previous) project crediting period but within two years after the end of the (previous) project crediting period.		When renewing the project crediting period, project proponents must update the project description and have it validated, which may occur at the next verification. The validation report, which is issued by the auditor who conducts the validation of the updated project description, cannot be issued before the initial or previous crediting period has concluded and it must be issued within two years of the end of the previous crediting period. For example, if a project's crediting period ends on 30 June 2027 a validation report must be issued between 1 July 2027 and 30 June 2029 in order to successfully renew the project crediting period. Where the validation report is not issued within two years of the end of the previous crediting period, the project would fail to renew the crediting period and would no longer be eligible to issue credits.
100	Other	3.7	Waste picker associations working together in the same city What if a project consists of an alternative collection system (run by waste picker associations) of recyclable materials that's different from the municipal one? What would be the location in this case?		The project location would be the same whether or not the collection system is established by the municipality. As long as the project activities are additional, the project proponent(s) demonstrate the right to operate the project activities and the location is clearly specified the project would be considered eligible under the Program.
144	Service Provider	3.7	It shall be clear that the defined areas should not cover more than one country, specially as the laws are not the same in different countries.		Project areas can currently cover more than one country as long as the project can demonstrate that it's not in violation of applicable laws in any of the countries, can demonstrate regulatory surplus in all the countries and can set a regionally representative baseline.
144a	Service Provider	3.7	It wouldn't make sense to declare a 'project' under the 3RI with different countries as they will neither share the same baseline, nor common practice, nor governance structure.		See response to Comment #144.
146	NGO	3.7	Could the 'project location' include the entire geographic footprint of a city or other political jurisdiction where, for example, a collection program is implemented or improved to recover more plastics?		There are no restrictions on the region a project can use as a project boundary or its location, as long as the project can demonstrate additionality in the region and can set a regionally representative baseline.
279	Service Provider	3.7	Unnecessary level of detail for Standard "geodetic coordinate shall be provided for each instance and provided in a KML file"	This level of specification does not make sense in this Standard, as it is a high level document defining core concepts and principles.	This is a high level requirement for all projects regarding how projects of any type must describe the project location. Per the requirement, this information is required only when it is reasonable to do so.
140	Service Provider	3.7.1 (2b)	Recovery projects may be subject to more fluid geographical boundaries. For example, collection routes may change over time due to increased awareness, capacity or interest in the project. Similarly, river, ocean and other environmental recovery activities may need to adapt recovery location based on where plastic waste is deposited/acummulation, which may vary as a result of strong weather patterns (e.g. heavy rainfall / storms).	Consider the level of detail required when projects are required to set the project boundary. Consider building in flexibility to the project boundary for projects that are likely to experience changes in recovery locations (e.g. project boundary could include description of possible recovery areas that are not currently included in the project scope).	Should a project have an idea of project activity instances that might develop in other areas in the future, the project can register as a grouped project. To maintain the integrity of the baseline that is set for the project based on the defined geographic region however, it will not be possible to incorporate flexibility in the project boundary after the start of a project activity. Should there be anticipated changes in the collection route/point of accumulation of plastic waste, the project boundary can be set to be wide enough at the start of the project activity to accommodate for this.
138	Service Provider	3.8	what happen with the recovered plastic if there is no end of life scenario?	It is not clear why is allow to not having an end of life scenario. This might create only a shift of plastic waste from one region to other and even worse a double counting of the same plastic waste in two regions. It shall be assure that the recovered waste is treated, even if this activity is not included in the project.	The methodologies will ensure that recovery projects include an acceptable end-of-life scenario in the project boundary. Projects will be required to demonstrate that the recovered plastic has been sent to an appropriate end-of-life destination, and appropriate end-of-life destinations will be defined by the methodology.
141	NGO	3.8	Importance of end-of-life scenario	Why is the end-of-life scenario not a requirement for all projects? Surely this is a key element in achieving the broader circular economy goals of the Standard.	The methodologies will define the eligible sources and end-of-life scenarios based on the specific project activity. Projects will be required to demonstrate that the material reached an eligible end-of-life scenario, which must be confirmed by an auditor during validation and verification.
142	Service Provider	3.8	Transfer of waste	Many collection and recovery project does not have capacity to showcase the linkage to end of life scenarios. there may be cases the material collected from one state/province transfer to another province for recycling. Many cases it is being transferred to other countries. The project boundary section need to define how these transfers will be treated?	The project boundary will need to include the movement of the material across the value chain, from the source through management until an appropriate end-of-life destination. While requirements for proof of demonstration of appropriate end-of-life management might vary by region and project activity type as prescribed in the applicable methodology, all projects will be required to include end-of-life scenario(s) in the project boundary to issue Waste Recovery Credits or Recycling Credits.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
143	NGO	3.8	Considering that some waste might be transported long distances between the source and end-of-life site, the project boundary should consider including this geographic area in some way as there is the potential for waste to leak during this phase of the project.		The inclusion of a discount factor to account for the leakage of material into the environment during transportation and other steps in the value chain is currently under consideration. Leakage discount factors will be prescribed in the methodologies, as relevant.
148	Service Provider	3.8	What does MRF stand for?	define MRF	MRF stands for material recovery facility. This will be expanded and defined in the <i>Program Definitions</i> document.
115	NGO	3.8	The section contradicts with Protection of jobs and safety Requirements (3.13.3) as landfills should not be a source for plastic recovery. This encourages the creation of informal plastic waste picking where safety requirements cannot be implemented. These standards should encourage the formalization of this informal market, not encourage it.		We recognize the social risks associated with recovery of plastic waste from the landfill. However, a lot of plastic waste that could be recycled or disposed of in a more sustainable way is currently sitting in landfills. Without incentivizing the recovery of such plastic, it will remain in the landfill and likely make its way into the environment. Without increased revenue, informal collection systems will not be able to transition into more formal waste management systems. Some communities and regions can operate more effectively in less formal systems and this Program should not mandate the exact waste management structure in a given region. Rather than excluding and preventing informal collection systems from having the opportunity to move into more formal systems we are allowing them to access additional revenue and giving them the opportunity to scale their activities while meeting minimum social and environmental safeguards.
147	NGO	3.8.1	This project boundary should not limit the breadth of the recovery area if capacity to have further impact is possible.		The project boundary can encompass the breadth of the area in which recovery can take place as long as the project can demonstrate additionality and set a representative baseline for the entire area.
17	Industry	3.9	More clarity needed on how a baseline will be or should be defined by country /by project. We should not consider historical informal waste picking activities as part of the baseline, when the conditions are at unacceptable levels from environmental or social safeguard perspective.		<p>The methodologies approved under the Program will include procedures for setting the crediting baseline, likely using standardized approaches (e.g., performance benchmarks). Standardized baselines are typically based on the performance of the project activity and/or management of the relevant plastic types in a specific geographic region. Using standardized crediting baselines will help ensure that the crediting of recovery/recycling of different plastic types is based on regional data and performance.</p> <p>We must ensure that credited projects advance the primary objective of the Program, which is to support and scale-up activities that increase plastic waste recycling and/or recovery from the environment. Specifically, credited activities need to increase the recovery and/or recycling of waste plastic beyond what would have happened without the project. To assess this, crediting baselines must be set at the level that captures (and does not credit) existing plastic waste recovery and/or recycling activities. Otherwise, the resulting credits could not be used for claims associated with real and additional waste reduction and recycling, which is critical if buyers use the credits to mitigate their plastic waste footprint (i.e., using the credits as offsets).</p> <p>Informal collection activities are likely to appear on a positive list for demonstration of additionality and Verra aims to establish performance benchmarks for informal collection projects to use in baseline setting. All projects must meet minimum social and environmental requirements.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
18	Other	3.9	Baseline = start date? + social considerations	It's important to decide if the baseline scenario is the same of the project start date or can be another. Especially important when, prior to the start of the project, some actions were being taken to collect recyclable materials, but with the start of a new project or external support, new actions are implemented that modify the amounts recovered, the work methodologies or the allies of the recyclers' associations. (3.9.3) Considering the case of waste pickers projects, the baseline should take into account the socioeconomic conditions at the beginning of the project as well as the amount of recycled materials; or social considerations should not be included in the baseline?	<p>The baseline scenario will either capture the historic performance of the project activity/similar activities in the area up until the project start date or the projected performance of the project activity/regional performance of the activity without the implementation of the project (i.e., business-as-usual). Methods for setting a baseline will be provided in detail in the methodologies approved under the Program.</p> <p>All projects must meet minimum social and environmental requirements, referred to as Safeguards in the <i>Standard</i>. The safeguards ensure that there is improvement in the social and environmental conditions of the project up to the level required by the safeguards, which means projects will need to monitor social and environmental conditions over time. However, the crediting baseline will only account for the amount of plastic recovered and/or recycled in the baseline scenario.</p>
18	Service Provider	3.9		Maybe the Standard should further specify that the baseline at the start date should take into account foreseeable changes in the future (e.g. when a new law on waste collection has been passed shall be implemented in the next two years). I also agree with taking into account socioeconomic conditions. Maybe these could be analogous to SDG indicators.	<p>Typically, recently implemented practices and newly established practices are the best project alternatives to use when establishing the baseline scenario. It may be difficult to find data for practices that are not yet fully implemented and practices that are planned, although they may provide a better indication of trends in technology and practices than existing technology and practices. Depending on the temporal range used to evaluate the project alternatives, planned policy changes may be included in the baseline scenario, particularly if the project is developing a baseline based on projected performance. Baselines will also be reviewed at crediting period renewal, and where the baseline is found to be invalid a new baseline will be established in accordance with the applicable methodology and Program rules.</p> <p>All projects must meet minimum social and environmental requirements, referred to as Safeguards in the <i>Standard</i>. The safeguards ensure that there is improvement in the social and environmental conditions of the project up to the level required by the safeguards, which means projects will need to monitor social and environmental conditions over time. However, the crediting baseline will only account for the amount of plastic recovered and/or recycled in the baseline scenario.</p>
19	NGO	3.9	Baseline scenario should also include documentation of baseline social and environmental conditions	Baseline scenario should also include documentation of baseline social and environmental conditions, to provide documentation to measure safeguards against.	<p>All projects must meet minimum social and environmental requirements, referred to as Safeguards in the <i>Standard</i>. The safeguards ensure that there is improvement in the social and environmental conditions of the project up to the level required by the safeguards, which means projects will need to monitor social and environmental conditions over time. However, the crediting baseline will only account for the amount of plastic recovered and/or recycled in the baseline scenario.</p> <p>The <i>Project Description Template</i> requires project proponents to describe the social and environmental impacts of the project activities at the start of the project and the steps that will be taken to mitigate them. Project proponents are also required to demonstrate that the project meets the social and environmental safeguard requirements for all identified impacts throughout the crediting period. While social and environmental conditions are not part of the crediting baseline, projects will need to establish a social and environmental impact baseline in order to monitor and report on those impacts throughout the life of the project.</p>
20		3.9	Clarity on the baseline	Baseline condition need to consider waste collection/recovery as well as end of life solutions. Otherwise, without a proper linkage there may be cases of double counting. It is better to have definition of recovery and recycle at the Standard level and subsequent methodology can adopt the same definition and can make it consistent to the standard.	<p>The baseline scenario must account for the amount of plastic waste recovered and/or recycled and the current management of the plastic waste (i.e., the end of life solutions for plastic waste without the project activity). The methodology will provide further details on how to determine the baseline and project boundary for recovery and recycling activities.</p> <p>The definitions of recovery and recycling will be included in the <i>Program Definitions</i> document. These definitions should be applied consistently throughout the program documents and in Program implementation.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
21	Service Provider	3.9	From the texts included in this section, it can be interpreted that regular plastic waste management by waste producer or any authority such as local municipality etc. can be the baseline, whereas project scenario will be practices related to recovery and recycling. So here it is important to specify the 'end of use' of plastic waste at baseline scenario even after management. This is because in some countries (e.g. India), there are many local practices of collecting (informal) plastic from managed landfills and selling out to various vendors who finally recycle or reuse them in different form. In such cases, even the baseline scenario will be ultimately the recycling of plastic waste. Similarly, in many industries, the plastic waste is sold to third party and hence end of life of such plastic waste is undetermined. So how this probable threat can be addressed?	Therefore, suggestion is that 'Baseline section' should provide provision for all such probable scenarios such that identification of baseline is not only based on "pre-project scenario" or based on "common practice" in the region, rather it should be based on ongoing or potential project activities in absence of which business-as-usual scenario may get negative impact. Or say in absence of project activity probable above the baseline conditions may not likely to improve in due course !	The baseline scenario will either capture the historic performance of the project activity/similar activities in the area up until the project start date or the projected performance of the project activity/regional performance of the activity without the implementation of the project (i.e., business-as-usual). Methods for setting a baseline will be provided in detail in the methodologies approved under the Program. Typically, recently implemented practices and newly established practices are the best project alternatives to use when establishing the baseline scenario. It may be difficult to find data for practices that are not yet fully implemented and practices that are planned, although they may provide a better indication of trends in technology and practices than existing technology and practices. Depending on the temporal range used to evaluate the project alternatives, planned policy changes may be included in the baseline scenario, particularly if the project is developing a baseline based on projected performance.
22	NGO	3.9	Can the baseline scenario be established through modeling or is more rigor required - e.g., through a study that establishes disposal and recycling benchmarks?		The methodologies approved under the Program will include procedures for setting the baseline, likely using standardized approaches (e.g., performance benchmarks). Standardized baselines are typically based on the performance of the project activity and/or management of the relevant plastic types in a specific geographic region. Using standardized crediting baselines will help ensure that the crediting of recovery/recycling of different plastic types is based on regional data and performance. Where standardized approaches such as performance benchmarks are not available, projects may use a project-specific approach for determining the baseline scenario and crediting baseline. Requirements for this approach would be established in the applicable methodology, but modeling is likely to be an acceptable approach.
23	NGO	3.9		Baseline scenarios should be made different for recycling in comparison to recovery - recycling volumes will be higher and less labour intensive than recovery. Recycling happens at a higher rate to recovery so from this baseline calculation, recycling of plastics will be drastically different.	The methods for establishing the baseline scenario and setting the crediting baseline, as set out in the methodologies approved under the Program, will be different for recovery activities and recycling activities. Such methods may also vary for specific project activity types within recovery or recycling (e.g., mechanical recycling vs. chemical recycling).
25	Service Provider	3.9	Baseline - provision to demonstrate scenarios based on futuristic development !	Generally plastic waste based projects are more well driven with socio-behavioural changes with time. Plastic is one of the most essential products in daily life, especially for developing nation and countries with larger population. Hence waste generation is also an unavoidable concern. For many nations (in many aspects of governmental initiatives or at private level), plastic waste management, recycling and recovery etc. are somewhat adopted at municipality level, however as compared to waste generation the recovery and recycling practices are insufficient. Therefore, even though there could be ongoing practice of recovery and recycling in a region where any new project is started for recovery and/or recycling purposes, then the new project should not get restricted because of baseline scenario which is also recovery and/or recycling. Therefore, it is suggested that baseline section should be wide open for all possibilities to demonstrate if there is a baseline for the project from other perspectives, such as - huge availability waste as compared to existing recovery/recycling, whether new project is capable of bringing social & behavioural changes that can influence responsible production and consumption, whether such new project will bring/establish improved waste management practice in the region, whether such new project can positively influence policies and regulations, etc. ??	The baseline scenario will either capture the historic performance of the project activity/similar activities in the area up until the project start date or the projected performance of the project activity/regional performance of the activity without the implementation of the project (i.e., business-as-usual). Methods for setting a baseline will be provided in detail in the methodologies approved under the Program.
26	Industry	3.9	We should not consider historical informal waste picking activities as part of the baseline. These activities would rather fall in a category such as unacceptable business-as-usual scenario and would then be automatically excluded from business-as-usual.		See response to Comment #17.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
1	Service Provider	3.10	Agree that plastic units for offset purposes should represent an increase in plastic waste recovered or recycled over a business as usual scenario. We note the challenges in demonstrating this additional recovery/recycling, particularly for projects in locations where data is lacking, or where the credit investment is needed to sustain the recycling activity. We suggest providing examples of the types of evidence that can be used for these cases.		The methodologies approved under the Program will include procedures for demonstrating additionality and examples of the types of evidence that can be used to demonstrate additionality.
2	Service Provider	3.10	Business as usual scenario There may be cases, where in small local bodies no collection or certain amount of collection is happening and the plastic credit mechanism will lead to collection of additional plastic waste. However, in case of large Urban Local bodies the plastic waste collections revolves around many of the formal and informal sectors and many case its decentralised. The challenge will be to define business as usual scenario in large ULBs.	Thus, the mechanism may consider certain kind of weightage to overall collection of plastic waste for respective ULBs based on country /region specific data. Example: For India MLP 100% credit and for PET 10% credit for the total amount of waste collections/recycled.	The methodologies approved under the Program will likely include procedures for setting the crediting baseline using a standardized approach. Standardized baselines are typically based on the performance of the project activity and/or management of the relevant plastic types in a specific geographic region. Using standardized crediting baselines will help ensure that the crediting of recovery/recycling of different plastic types is based on regional data and performance.
3	NGO	3.10	Yes. Also, it needs to state that the company who is buying the plastic credits is working on decreasing its unnecessary plastic usage where possible. If this is not the case then this aspect is open to abuse and companies not reducing plastic usage, yet buying credits to satisfy EPR. The company needs to hold some responsibility before buying plastic credits, else the plastic credit system will lose its credibility in the market like the carbon market did. Credits should never be used as a licence to pollute.		Efforts to eliminate problematic or unnecessary plastic use (including via reuse), substitution of virgin plastic with recycled, compostable or other more sustainable alternative <i>before using plastic credits</i> will be addressed in the Corporate Accounting and Claims Guidelines (currently under development).
4	Industry	3.10	The standard should take huge care to ensure informal sector inclusion.	One idea could be to include a positive list of activities that don't need to demonstrate additionality	Verra is working to ensure that the Program is accessible to small scale, community-based projects, many of which will be based in the informal sector. The methodologies developed under the Program will make use of positive lists for certain project activity types, as applicable. Verra also aims to include standardized approaches for setting crediting baselines in the methodologies to reduce the cost of implementation, particularly for small scale projects.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
5	Other	3.10	<p>Our understanding is that every project that is approved/registered under the Plastic Standard of VERRA and entitled with Plastic Units, shall go through a validation process and "Additionality" will be one of the required parameters to be demonstrated. Therefore, at additionality assessment level few parameters can be prescribed which need to be addressed or demonstrated by project proponent as ongoing or futuristic aspects of the project that enable the project to become beyond a business-as-usual practice. Here we can define such parameters in line with the footnote reference 5 in the Standard.</p> <p>[Here our rational is that – every project that is involved in waste management in any segment of the value chain has to go through a series of challenges. The proper development and implementation of practices for recovery and recycling shall encompass with many changes both at ground level and at policy level, with time in long run. With time and technological penetration, both producer and consumer awareness shall also be influenced by such projects. Therefore, business-as-usual scenarios are largely get surpassed in all potential and good scale projects. Therefore, it can be a part of additionality assessment to represent a weighted value in the Plastic Units.]</p> <p>By doing so, every approved or registered project by default will be above a business-as-usual scenario; hence Plastic Units generated from the project by virtue will represent an increase in practice over the current business-as-usual scenario. Hence, any user of the Plastic Unit will be assured that project has represented over the business-as-usual scenario.</p>		<p>The determination of the baseline will take into consideration the management approach for different types of plastic. The crediting period renewal process ensures that the original baseline scenario remains valid and/or that the baseline scenario is updated on a regular basis. Updates to the baseline scenario help account for the influence of project activities on the baseline over time.</p>
7	Service Provider	3.10	There should be a net reduction of plastic in the environment.	<p>There are a couple of different ways to ensure this. You could</p> <ol style="list-style-type: none"> 1) require entities that retire offsets have a net reduction policy in place, but this could have enforcement challenges or ii) automatically require a % of offsets be retired upon issuance to ensure net reductions. This would have the same result as mucking around to reduce the baseline but may be simpler to manage, particularly if this % reduction changes over time or someone wants to voluntarily cancel more offsets than required to be "plastic neutral" or be "plastic negative". 	<p>Both suggestions will be considered in the development of the Corporate Accounting and Claims Guidelines.</p> <p>Suggestion (ii) will be considered in development of the Plastic Accounting Program. It would require the development of some sort of "net reduction" pool of credits that are automatically retired, since we foresee that most credits issued under this system will retired quickly by their first buyer in any case.</p>
8	Service Provider	3.10	We note the requirements for projects to demonstrate their activities are in 'excess of what would be achieved under a business-as-usual scenario', though it is not yet clear how this will be defined or by whom.	Please provide a definition of 'Excess' in this case, and outline who will be responsible for determining what is business as usual for each project type and activity.	The project proponent(s) is responsible for determining the baseline (using methods provided in the applicable methodology approved under the Program) and demonstrating that their new or expanded project activity results in an output greater than the output that would have occurred in the absence of the project activity. Examples of increased output include an increase in the amount of plastic recovered or recycled, and recovery or recycling of a new type of plastic compared to the without project scenario.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
10	Industry	3.10	<p>We should be very mindful not to overcomplicate the process because of carbon examples.</p> <p>We should also be very careful to avoid double counting between different project activities and different credits.</p>		<p>We must ensure that credited activities advance the primary objective of the Program, which is to support and scale-up activities that <i>increase plastic waste recycling and/or recovery from the environment</i>. Specifically, credited activities need to increase the recovery and/or recycling of waste plastic beyond what would have happened without the project. To assess this, crediting baselines must be set at the level that captures (and does not credit) existing plastic waste recovery and/or recycling activities. Otherwise, the resulting credits could not be used for claims associated with real and additional waste reduction and recycling, which is critical if buyers use the credits to mitigate their plastic waste footprint (i.e., using the credits as offsets).</p> <p>It is also important for the Program to promote activities that go beyond business as usual to support the transition to a circular economy.</p> <p>It is crucial for the Program to include requirements to avoid double counting. Methodologies approved under the Program will include clear accounting procedures to prevent double counting, particularly for activities that result in both recovery and recycling.</p>
11	Other	3.10	<p>Yes is the answer to the question if you are using the terms "baseline" and "business-as-usual" interchangeably.</p>		<p>The 'business-as-usual' scenario is used to determine the crediting baseline. In other words, the crediting baseline is set by evaluating the amount of waste that is recovered and/or recycled prior to the implementation of the project activity assuming normal conditions will continue unchanged. Baselines can be set at the individual project level or by using a standardized approach that considers the performance of the project activity at a relevant geographic scale. If a project aims to issue credits for their activities, credits will be issued based on the amount of plastic waste recovered and/or recycled above the baseline.</p>
12	Other	3.10	<p>Is additionality only considered in this definition? In other words, only with the presence of the incentive provided by the plastic crediting mechanism, has plastic collection been increased? Isn't it more interesting to consider that, thanks to this additional financing (the plastic crediting mechanism) it has been possible to sustain an activity of collecting and/or transforming plastics, which has led to the recovery of greater amounts of plastic, thanks to the fact that it's an activity that generates income and more people want to work in that activity? This is from the point of view of waste pickers, and thinking of improving their quality of life.</p> <p>Answering the question: Yes, it should. If the project activities do not represent an improvement regarding recycling in a business-as-usual scenario, then the whole activity shall be obsolete and therefore the credits would have no environmental value, which is the final objective of the initiative.</p>	<p>Increase in plastic collection should also be taken into account (besides economic criteria)</p> <p>In a sense, this comment is related to point 3.11. If we take into account the definition of additionality of the CDM (also from the EU ETS), it should take into account the amount of plastic that is recovered. This does not imply that point 3.11 Quantification of Recovered and Recycled Plastic Waste has full validity as defined.</p>	<p>The aim of the Plastic Accounting Program is for projects to use the additional financing to sustain increased levels of activity and scale. The goal of the crediting mechanism is to create a market for the outputs of plastic waste recovery and recycling activities so the activities can become more financially self sufficient.</p>
13	NGO	3.10	<p>Additionality as a concept</p>	<p>McKinsey.org agrees with the concept of additionality</p>	<p>N/A</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
14	Service Provider	3.10	Provision of applying Auto-additionality or Deemed-additional criteria !	Additionally, we also like to propose some conditions or criteria that enable certain types of projects or technology become deemed additional or auto additional, like is the case of Carbon Mechanism. This will largely influence project developers and investors in bringing more awareness into the sector and more projects will be implemented to joint hand for long run 3RI initiative. Some suggestions for auto-additionality are: 1) Any technology which is newly developed in the host country and market penetration is less than 1%. 2) Projects which are being initiated or developed by NGO sector or any micro industry segments. 3) Projects which were launched but could not sustain due to profitability and hence stopped, but can be restarted with financial support. 4) Recycling Projects where profitability from sale of recycled product is re-invested for social projects development such as women empowerment, skill building, etc. And many more such conditions.....depending on the context of various geographies. As per our experience of working in this sector, it is quite relevant that majority of the waste based projects are facing set of challenges which may or may not be documented under the framework of "Additionality". Therefore, provision of auto-additionality will be helpful and can largely & positively influence the sector.	The methodologies developed under the Program will make use of positive lists for certain project activity types, as applicable. Verra also aims to include standardized approaches for setting crediting baselines in the methodologies to reduce the cost of implementation, particularly for small scale projects.
15	Industry	3.10	The concepts of additionality and the mandatory need of the incentive provided by the plastic crediting mechanism are necessary?		Correct. We must ensure that credited activities advance the primary objective of the Program, which is to support and scale-up activities that increase plastic waste recycling and/or recovery from the environment. Specifically, credited activities need to increase the recovery and/or recycling of waste plastic beyond what would have happened without the project, making the concept of additionality very important.
24	Service Provider	3.10	Should plastic units used for offset purposes represent an increase in plastic waste recovered or recycled over that which would have occurred in a 'business-as-usual scenario'?	Yes. Without additionality, the units will not be seen to have meaning and, therefore, value.	N/A
16	Service Provider	3.10	According to the requirement the additionality is to demonstrate activities above business-as-usual, which do not necessarily is the definition of baseline. Why two different approaches are taken. Business-as-usual is related to the future and baseline is related to the past. So in other words part of business-as-usual amount are going to be credited because are above the baseline, this seems not to be conservative. I suggest to use business-as-usual for both additionality and baseline.	This inconsistency should be managed in the definition of additionality by using business-as-usual for both additionality and baseline.	Baseline scenarios can also be based on expected future performance of waste management activities in the absence of the project activity.
73	Service Provider	3.10	Provision for demonstrating double-accounting	In addition, plastic waste flows also happens cross country and inter state, the document has not given clarity on the same. This need to be elaborated in the the documents.	The project boundary can encompass the movement of material across countries or across states, as long as this is in accordance with the methodology. Clarification of this point will be included in revisions to v0.1 Section 3.8. In addition, methodologies will elaborate on how the project boundary can be defined for different activity types and how the accounting of recovered or recycled plastic waste will take place within the project boundary. Projects with value chains spanning multiple regions will have to determine a baseline scenario representative of all the regions containing the project activity and will have to ensure that the movement of material can be accounted for. The methodologies will define how projects can undertake this accounting, e.g., through direct accounting or the use of discount factors. Where material moves across countries or states, the recovery and/or recycling of that material can only be accounting for (and credited) once.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
75	Service Provider	3.10	Double accounting	The Standard does not specify anything related to Double-Accounting while calculating 'Plastic Units'. But our understanding is that double-accounting principle must be included to clarify or to avoid certain conditions such as: 1) Project that combines both Recovery and Recycling, the quantity of recovered plastic is the same that goes for Recycling. So how the Plastic Units will be accounted? If both recovered and recycled waste will be entitled for 'Plastic Unit'? If not, then double accounting must be demonstrated. 2) There could be situations say, plastic waste is generated by an industry "A" and an entity "B" collects them and recycles. Now "B" applies under Plastic Standard and receives "Plastic Units"; whereas "A" undergoes only Accounting and at the end of accounting decides to purchase Plastic Units as Offset. In this case, if the Plastic Units procured from the project developed by "A" (without knowing the source of waste was from "A" only), then will it be considered as a Double-Accounting? If yes, then double-accounting principle must be included at Standard level.	Both recovery and recycling credits can be issued by a project under the Program. The serial number of each credit will include information on the project activities that resulted in the recovered and/or recycled plastic, such as geographic location and material type. In this case, this would allow for A to know that the credits they are purchasing are from B. In the example, unless A is recovering and/or recycling plastic it does not need to create a project. It is unlikely that a producer would be able to recover plastic from a location that includes only their own waste without knowing it. However, in that example if the producer is doing the recovery they would likely not be purchasing credits as well or would purchase credits only for the amount of waste they are not able to directly address. The methodologies approved under the Program will include detailed requirements for how plastic recovery and recycling must be accounted.
165	Service Provider	3.10	Exclusion of certain project activity types: Our understanding is that there could be certain set of projects that may not need the benefit of Plastic Standard (Plastic Units) even though project could justify additionality conditions.	Some examples are cited below. So we suggest that there should be some eligibility conditions set under the Standard which can prevent such projects, may be based on Additionality point of view or may be based on end of life point of view. Examples: a) Industries that deal with plastic materials and output & major byproduct (waste) of the process is again the same type of plastic. Let's take an example of Plastic Toy manufacturing Unit, hypothetically. This unit uses plastic (virgin/recycled) and at the end of the process again plastic wastes will be generated. Therefore, the company may potentially install a recycling unit to avoid such waste plastic such that reuse is possible within the manufacturing unit which is most feasible option for the company anyhow. So this kind of project may not be eligible to apply under the Plastic Standard. b) Projects developed by manufacturing units that generates plastic waste by itself and also takes credit under Sustainability Reporting. In recent time, Sustainability Reporting is a widely adopted practice. As a part of sustainability assessment and measures, companies are increasingly taking measures to avoid environmental footprints. In the meantime, Sustainability Reporting gives provision to disclose such measures and then indirect benefits are received in terms of green branding, eco-friendly tag etc. Therefore, any company that develops plastic projects (i.e. recycling unit within the facility) or contributes to any plastic project (i.e. recovery and recycling outside the facility where project is developed by a third party) and in parallel also discloses such actions as positive environmental measures under Sustainability Reporting (such as "Sustainable Supply Chain" etc.), then receiving "Plastic Units" by this company may be a kind of double accounting. Hence, they may be restricted. However, the third party entity that receives such wastes and recycles them may remain eligible for Plastic Project development under the Standard and claim Plastic Units. Thus, such include will also be associated with conditions such as - Any project or activity that purposely generates plastic waste for recover or recycling for commercial purpose cannot be applied under this mechanism.	We agree with the examples you gave and the additionality tests required in each methodology would prevent such projects from being eligible under the Program. However, as you point out, post-industrial waste could be recovered and/or recycled under the Program as long as additionality can be demonstrated for those activities. To help ensure projects do not receive credits under the Program for material that was purposefully generated to be recovered or recycled we included a statement in Section 2.1 of the <i>Standard</i> that states "The scope of the Plastic Accounting Program excludes projects that can reasonably be assumed to have generated plastic waste primarily for the purpose of its subsequent recovery and/or recycling." Verra is working with the 3R Initiative and other partners to develop guidelines for corporates on plastic leadership commitments in order to address concerns around transparency of corporate reporting.
48	NGO	3.11	Need definitions of recycled and recovered	Perhaps the intention is to have these definitions within the applied methodology, but I think they should be consistent to the standard as these will highly influence the environmental and social outcomes of the standard.	A standalone <i>Program Definitions</i> document (currently under development) will provide definitions for all terms used in the Plastic Accounting Program.
79	Service Provider	3.11	Use for accounting purposes only "Note - This section can also be used solely for the quantification of plastic waste recovery and/or recycling, and not for the issuance of plastic units."	The repeated note of what is and what is not applicable when using the Standard for accounting purposes only makes the document less easy to read. Maybe there should only be a highlighted note at the beginning and then a marking or relevant requirements with a star, colour or sth. similar.	Thank you for noting this. These notes can be confusing to readers. Verra will find another way to distinguish between the difference use cases of the <i>Standard</i> .

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
168	Service Provider	3.11	It would be helpful if there was guidance on how the unit is estimated. It is in kg, but is this wet? Dry? How does this relate to composite materials that are not 100% plastic. E.g. the link provides the example of fiberglass as a composite material consisting of glass and plastic. If fiberglass is removed from the environment, is the total weight of the fiberglass counted, or is the expectation to work out the fraction that is plastic (which seems unreasonable). How does the definition of plastic or composite materials deal with items removed from the environment that are not 100% plastic but also not composite? E.g. a discarded circuit board is a combination of plastics and metals. Is this eligible for recovery, and if so how is this dealt with?"		More detailed requirements on which stage in the value chain and how measurement should take place will be provided in the methodologies. As long as the materials meet the parameters for composite materials included in the revised Scope of the <i>Standard</i> , Waste Recovery Credits will be issued on the full weight of the material. Recycling projects will be required to report the amount of plastic being recycled from composite materials, therefore Recycling Credits can only be issued on the plastic that can be/is recycled.
169	Other	3.11	Mass, volume, or weight might not be the only metric or best metric.	Some plastic materials currently have more value by weight than others. In addition, some forms and types of plastic waste may be shown, in certain waste scenarios, to present more potential environmental impacts by weight than others. The standard should be robust enough to capture this distinction in order to avoid unintended consequences and unintended incentives. This might be solved by using a multiplier or extra credits based on the type and form of plastic waste.	Verra acknowledges the importance of ensuring that details on the plastic type being managed by the project are captured and communicated. Currently, plastic waste recovery projects will have the option to identify and share the plastic types being managed while plastic waste recycling projects will be required to do so. This information will be provided in the serial number of the credit and in the project description. The identification of plastic type is currently optional to avoid excluding projects where this identification of plastic type is currently not feasible or reasonable. Based on Verra's experience in other programs, the market demand for credits from projects managing certain types of plastic waste will drive value towards these projects.
169a	Service Provider	3.11	I agree. i guess this aspect would need a more detailed consideration/ discussion.		See response to comments #167, 169, and 170.
171	NGO	3.11	In anticipating the measurement of "recovered and recycled plastic waste," how do you anticipate measuring yield loss as plastics move from collection to end use?	Consider addressing where and how unit measurement will be specified and applied in the process between collection through creating of "pure resin" for industrial use.	Verra acknowledges the need to account for yield loss across the value chains of recovered and recycled plastic. The methodologies will account for this in the requirements provided for quantification for different activity types in different regions, as necessary. This will likely be in the form of a discount factor to reduce the amount of material that credits are issued on, based on the amount of material that leaks into the environment in the project's value chain.
172	NGO	3.11	It is anticipated that quantified measure of recovered/recycled plastics shall be ongoing (e.g., annual measurements) or can one-time or periodic measuring be used to measure continuous project impacts?		The required frequency of measurement of project impacts will be provided in the methodologies. While the project activities must be monitored throughout the life of the project, the method for monitoring can depend on the methodology applied.
174	Other	3.11	Credits given only subject to quantity of recovered material?	Is the amount of credits given only subject to quantity, or also subject to what kind of plastic it is or its quality?	Credits will only be given based on the quantity of material recovered or recycled, where one credit represents one kilogram of material recovered or recycled. Future versions of the Program may allow for the number of credits issued for recovered and/or recycled plastic to be weighted based on plastic type using an impact equivalency tool that is not yet developed.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
170	Service Provider	3.11	Clarity on defining 'Plastic Unit' for Quantification !	<p>It is not clear if the plastic unit or credit shall be issued based on the "kg of plastic waste" generated at baseline or "kg of finally recovered/recycled plastic"? This is important because especially in recycling technology the input waste volume is not necessarily the same volume of output recycled products. Also, the standard is currently not covering the "reuse" phase, hence clarity in quantification to define a "Plastic Unit" is important.</p> <p>In the initial section above, we put one comment concerning the same. And also added a suggestion that -</p> <p>A "Plastic Unit" must be defined as: (i) For "Recovery activity" - "1 Kg of waste plastic (all types as approved) that has been recovered irrespective of that is recycled or not"; (ii) For only "Recycling Activity" - "1 Kg of waste plastic (all types as approved) that has been processed for recycling. It also means that Plastic Unit is the quantification of waste plastic that would have been left unattended or unrecovered or non-recycled in absence of the project activity.</p>	<p>A plastic credit will be issued for each kg of plastic recovered and/or recycled by the project. The stage of quantification will vary for different project activity types. More detailed requirements on which stage in the value chain and how measurement should take place will be provided in the methodologies.</p>
280	NGO	3.11	<p>IMPORTANT</p> <p>Recovered, unrecyclable plastics should still count otherwise these will remain in the natural environment.</p> <p>For these, if recycling is not feasible due to contamination or degradation, then pyrolysis should be considered. Failing that then waste to energy. Failing that then responsible landfill.</p>		<p>Verra agrees with this statement. Projects that recover and manage unrecyclable plastic waste per the appropriate end of life destinations listed in the methodology will be eligible to issue Waste Recovery Credits. The appropriate end of life destinations will include waste-to-energy and managed landfills, parameters of which will be provided in the methodology. Where possible, projects should ensure that recovered waste ends up in the most responsible end-of-life scenario available.</p> <p>The movement of finance towards projects based on their position in the waste management hierarchy will be determined by market demand for credits from certain types of projects over others.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
230	Service Provider	3.11	Quantification, comparability and valuation of units	<p>Plastic recovery units: Will all types of plastic or packaging structures be treated the same, e.g. one kg collected PET is the same as one kg collected sachets is the same as one kg chemically recycled plastic? Will the price for one unit be the same across all projects or will the system allow differentiated pricing of units dependent on the project?</p> <p>Will 'safe disposal' create plastic units? What are the potential unintended consequences of the collection of material with no appropriate end-of life solution in the respective geography (flexible and multilayer plastic packaging)?</p>	<p>Verra acknowledges the value of assigning different values to plastics by polymer type to incentivize the recovery of traditionally unrecyclable or hard to collect plastics. Given the significant amount of time and research required to develop an impact equivalency tool to assign increased value to low-value plastics, Verra is aiming to include this in a future version of the <i>Standard</i>.</p> <p>Currently the Program accounts for all plastic types in an equal manner. Recovery projects will have the option to report on the plastic types, given the low feasibility of material sorting and identification in certain cases. Recycling projects will be required to identify material managed by the plastic types listed in the Scope of the <i>Standard</i>. The serial numbers associated with each credit will include the plastic type(s) managed by the project, if the project provides this information.</p> <p>With information on the plastic type(s) managed being included in the serial number of the credits, credit buyers will be able to purchase credits from projects that manage plastic types that they are unable to manage in their value chains (a majority of which tends to be low-value plastics). Based on Verra's experience, the value of the credits from projects will be determined by the market demand for projects managing certain types of plastic over others (i.e., credits from projects managing low-value plastic may have a higher value). The price of the credits will be determined by the market and will not be prescribed in any way by the Program. The market will likely result in differentiated pricing based on buyer preferences.</p> <p>The "safe disposal" (i.e., the disposal of recovered materials in appropriate end-of-life destinations as defined by the methodology) will allow for projects to issue Waste Recovery Credits. Projects that cannot demonstrate the disposal of materials in appropriate end-of-life destinations will not be eligible under the Program. The objective of the Program is for credit financing to incentivize recovery and recycling projects to use the financing to find or develop appropriate management solutions.</p>
230a		3.11		The standard should take the principles of waste hierarchy duly into account and -if possible-differentiate between different processes.	<p>The Waste Recovery and Recycling Credits as well as project descriptions will reflect the nature and type of the project activity. Based on Verra's experience, the value of the credits from projects will be determined by the market demand for projects managing certain types of plastic over others (i.e., if credit buyers are interested in driving finance towards projects per the waste management hierarchy, the value of credits will reflect the position of activities in the waste management hierarchy).</p> <p>The movement of finance towards superior activities in the waste management hierarchy will be determined by the market and encouraged, although not prescribed, by the Program.</p>
175	Service Provider	3.11.1	does the requirement require plastic to be recovered AND recycled together? What about plastic that can't be recycled but can be better disposed of once recovered from the	suggest revising text to be "and / or" to read "The total volume of plastic waste recovered and / or recycled by the project shall be quantified"	Plastic does not need to be recovered and recycled together. We will clarify this throughout the <i>Standard</i> v0.2.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
9	NGO	3.11.2		Estimating the volume of recovered and/or recycled plastic waste by plastic type needs to be mandatory and should also include location of recovery (existing recycling infrastructure, terrestrial recovery or marine recovery).	Some projects may not be able to quantify the waste recovered or recycled by plastic type. Investors and credit buyers with less specific corporate commitments or commitments in specific regions will support these projects. However, there are some project activities that can and must quantify the waste recovered or recycled by plastic type. Investors and credit buyers with commitments for specific plastic types will likely support projects that are able to quantify their recovery and/or recycling by plastic type. A description of the activity(ies), location and project boundary must be provided in the project's documentation.
166	Industry	3.11.2	point 3.11.2	This requirement is not possible to establish for multilayered plastic packaging for instance. This needs to be adapted to mixed streams of plastic waste which is the feedstock used for some chemical recycling technologies to recycle the plastic. The recycled content produced don't have to be the same as the ones from the original feedstock (ie: go back to the basic molecules)	Verra agrees that this requirement will not be feasible for all projects. The quantification of recovered volume by plastic type will not be required, however the quantification of the plastic type in the input and output streams of recycling projects will be required by the methodology. The Scope of the <i>Standard</i> will allow materials to be identified as mixed plastic or by packaging type, should it not be feasible to identify the material by plastic type. The methodology will further describe how this quantification will take place for chemical recycling where mixed streams of plastic waste are used as feedstock.
167	Service Provider	3.11.3	units in kg. It is necessary to differentiate between each type of plastic because the challenges and effort requires for collection of each type of plastic varies. Thus, credit need to differentiate credit for each type of plastic.	It will be better to have these units in tonnes. Rounding to tonnes will be easier for accounting purposes.	Recovery projects are not required to identify material by plastic type due to the practical challenges of doing so but have the option to report on volumes recovered by plastic type. Recycling projects will be required to identify material managed by the plastic types listed out in the Scope of the <i>Standard</i> . The serial numbers associated with each credit will include the plastic type(s) managed by the project, if the project provides this information. The unit of measurement is currently kilograms to accommodate for small-scale projects with potentially lower rates of recovery and recycling. Verra will consider changing this to tonnes based on the pilot projects currently testing the <i>Standard</i> .
173	Service Provider	3.11.3	when in the cycle are the kgs estimated, and is this wet or dry? E.g. is it weighed when first recovered from the environment when it could be wet, dirty etc, or after it has been washed before further processing?		The stage of quantification will vary for different project activity types. More detailed requirements on which stage in the value chain and how measurement should take place will be provided in the methodologies.
246	Industry	3.13	More guidance around pre-assessment or identification process would be helpful to ensure reputational risk of 3RI standard is managed effectively, in case of failure.		Verra will work to develop guidance and/or provide references to resources on impact identification and mitigation planning, such as causal chains. This may not be included until v2 of the <i>Standard</i> .
191	Service Provider	3.13	Job loss safeguard	#5 could disallow a plastic recovery or recycling technology that supplants existing, more labor-intensive, recovery/recycling. Disincentivizing efficiency makes it more difficult to scale solutions and create viable business models.	This safeguard requirement will be reconsidered with this point in mind.
194	Service Provider	3.13	Allow differentiation to fit local context and ramp up of safeguards over time	A general guideline of safeguards that apply universally will be challenging to define and implement, especially given the very diverse local conditions. Furthermore projects may struggle to demonstrate compliance with these safeguards from day one, a scoring and ranking system, including a ratcheting of the parameters may be more workable to enable project registration and uptake of the standard. Regionally living wages are difficult to determine and compare. Improvements in efficiency may result in headcount reduction and net job loss. Minimal to no increase in GHG emission will be challenging given the increased economic activity and logistics associated with collection (tricycles, trucks) and recycling process (sorting, washing, grinding...)	The <i>Standard</i> provides general safeguard requirements for project proponents to adopt and demonstrate compliance with based on what is regionally feasible and relevant. Projects will have to identify potential negative impacts and how they plan to mitigate them to meet the "do no harm" level requirements at validation. The <i>Standard</i> can include a statement highlighting the flexibility for projects to demonstrate compliance with the safeguards as is reasonable in the local context.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
195	NGO	3.13	3.13.2 - should also include compliance with all local international laws, including labor laws and minimum wage	3.13.2 - should also include compliance with all local laws, including Universal Declaration on Human Rights, labor laws and minimum wage. Perhaps this is covered elsewhere but I don't see it. Additional considerations should be made for the informal sector around assurance of their rights and compensation.	The <i>Standard</i> requires that all projects demonstrate that their activities will not at any time be in violation of any applicable law, including laws related to labor and minimum wage. The safeguard requirements currently require that project actors are protected against human rights abuse per the <i>UN Guiding Principles on Business and Human Rights</i> and shall earn at least a regionally-determined living wage. Section 3.13.3 in the first consultation version requires that projects apply the same safeguard requirements for all project actors. The safeguard requirements are being re-evaluated to ensure that they are appropriately robust and stringent. In this re-evaluation, we will consider highlighting the requirements for the informal sector and/or having additional considerations for the informal sector. We will also consider referencing the Universal Declaration on Human Rights in Section 3.13.2 in v0.2 of the <i>Standard</i> .
199	NGO	3.13	Requirements within 'do no harm' should be strengthened	The language of 'take steps to mitigate' is too weak in the first sentence of section 3.13.2. The language in the individual points is stronger (eg 2 "There shall be no forced labor in the implementation of the project activity), but this overarching weaker language potentially causes confusion as to the extent to which projects must go to reach the standard. Examples of more positive social elements projects should include: - provide or finance training opportunities for informal waste workers, including access to education, lifelong learning and skills development; - commit to growing the entrepreneurial potential, creativity, dynamism, skills and innovative capacities of informal waste workers; - provide or enable access to finance, particularly tackling barriers faced by women and marginalised groups, to be able to move up the waste value chain.	Verra recognizes the value of projects with positive environmental and social impacts. However, to accommodate for small-scale projects and ensure that they are not unfairly burdened or excluded, the <i>Standard</i> currently has "do no harm" level safeguard requirements. The safeguard requirements are under re-evaluation to ensure that they are appropriately rigorous and stringent. The <i>Standard</i> will include a statement encouraging project proponents to report social and environmental outcomes beyond what is required by the Safeguards and provide examples of such impacts. Verra will also provide support for projects to use other standards, such as the Sustainable Development Verified Impact Standard , to demonstrate positive impacts once the Program is launched.
200	NGO	3.13	Stakeholder consultation must include waste pickers and governments	The standard should include specific reference to waste pickers as a stakeholder group it is mandatory to engage with. The involvement of local and/or national governments should also be much more explicit. Suggested wording: " Projects should identify all relevant stakeholders through mapping and create stakeholder forums with regular meetings and clear rules of engagement, with representation from local governments, trade unions and informal waste workers. These key stakeholders should be involved in the design, monitoring and evaluation of each project.	Section 3.13.5 of the <i>Standard</i> will be revised to explicitly state that "Project proponents should identify all relevant stakeholders through mapping, ensuring representation from local governments, trade unions and informal waste workers if relevant." Project proponents can create stakeholder forums with regular meetings to demonstrate compliance with Section 3.13.7 (i.e., the establishment of ongoing communication with stakeholders). However, the creation of stakeholder forums will not be explicitly required by the <i>Standard</i> so that project proponents can implement this requirement according to the local and regional context.
210	Other	3.13	Giving a chance to meet safeguards progressively, not right from the start	When working with waste pickers in LATAM, even if they are supplied with Personal Protective Equipment, they do not want to use them, since they are not used to it. Little by little though, they are trying to use them. Meeting all safeguards should be a requirement to keep improving throughout the period of validity, but not an obligation from the start. Applicants should be given the chance to keep improving.	A pathway of continuous improvement will be burdensome on projects since it is more expensive to assess. The issuance of credits prior to the demonstration of compliance with the safeguard requirements is also risky. Projects are currently only required to meet "do no harm" level safeguard requirements to identify and mitigate negative environmental and social impacts. The requirements are being re-evaluated to ensure that they are not unreasonably burdensome on small-scale/under-funded projects while ensuring that they are appropriately rigorous and stringent.
211	NGO	3.13	Stakeholder process should be documented and publicly accessible, including mitigation plans	Stakeholder process should be documented and publicly accessible, including mitigation plans. Additionally, There needs to be clarity on what information will be available to the public to comment on for each project. There should be a standardized project format which includes all critical information that may be of interest to the public, including the stakeholder consultation report.	The stakeholder consultation process will be documented by the project proponent in the project description, which is a publicly accessible document. The Stakeholder Consultation section of Section 3.13 lists the high level requirements of the stakeholder consultation process so projects can perform a stakeholder consultation based on the local or regional context.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
212	NGO	3.13	Grievance process unclear - needs strengthening	A consistent and independent mechanism is needed to document and respond to grievances, both from stakeholders and from those directly involved in projects. It should comply with ISEAL best practices and it should provide specifically: 1. a mechanism for stakeholders to challenge certification of a project 2. a mechanism for workers and stakeholders to bring concerns directly to the standard for new and current projects.	The Stakeholder Consultation process described in the <i>Standard</i> requires that the project proponent establish a mechanism for ongoing communication with stakeholders. The <i>Plastic Standard Program Guide</i> will further set out a complaints and appeals procedure for all project proponents, project actors and stakeholders to submit enquires to Verra.
215	NGO	3.13	Change in emphasis needed	Could this language and emphasis be changed so that rather than 'project activities should not negatively impact the natural environment or local communities', projects must 'positively impact the natural environment and local communities and identify and address any negative social and environmental impacts'? This shouldn't result in a 'niche ethical stream' of projects who are demonstrating positive social and environmental impacts, but rather the scaling up of best practice in terms of positive social and environmental standards.	See response to Comment #213.
216	NGO	3.13	Consultation with the informal waste sector needed	Projects should work with the informal waste sector to identify and implement safe working practices and policies (s3.13.2, point 4). The potential hazards and safety risks, and the appropriate responses, should be identified in consultation with waste workers.	Project proponents will be required to perform a stakeholder consultation and engage with stakeholders to allow them to inform project design, evaluate impacts and raise concerns about potential negative impacts of the project. This will ensure that projects engage with the informal waste sector if they have informal waste sector involvement.
242	Service Provider	3.13	Specify timing of public comment period	The requirement should specify that the public comment period will only be open during a project's validation and re-validation stage, if that's the case. If the requirement is applicable to verification activities, a shorter commenting period should be used.	In v0.1, public comment periods are required before any assessment, e.g. validation, verification and re-validation. This will be made more clear in v0.2 of the <i>Standard</i> .
243	NGO	3.13	1. There should be a set of prescribed minimum stakeholders that are engaged (including the informal sector). The stakeholder consultation should be open to the public. The stakeholder consultation process should be captured and publicly accessible, including mitigation plans. 2. There needs to be clarity on what information will be available to the public to comment on for each project. There should be a standardized project format which includes all critical information that may be of interest to the public, including the stakeholder consultation report. 3. Is there an independent mechanism through which stakeholders can challenge the certification of a specific project?		1. While identifying a minimum set of stakeholders for each of the wide range of activities this Program aims to address would be very challenging, the project proponent is required to identify and engage "all stakeholders" either "directly or through legitimate representatives". We will consider adding special consideration to marginalized and vulnerable groups to this requirement (Section 3.13.5 in v0.1 of the <i>Standard</i>). Members of the public who are not considered stakeholders of the project shore The <i>Standard</i> calls for "ongoing communication with stakeholders" (Section 3.13.7 in v0.1 of the <i>Standard</i>). We will add that this communication should include the same response that the project proponent provides to the assessor on what action it has taken in respect of stakeholder consultation and communications. 2. The project documents that will be assessed (either the Project Description or Monitoring Report) will be fully available to the public in each comment period. The documents required for public comment will be listed in the <i>Program Guide</i> . 3. We would encourage stakeholders to come to Verra with any grievance about a project or its implementation that has not been satisfactorily addressed by the project proponent or assessor. Verra's Complaints and Appeals Policy , available on the Governance page of our website, will be referred to in the <i>Program Guide</i> as a mechanism for stakeholders to challenge a project's certification. The <i>Program Guide</i> will be available for comment in the second public consultation.
249	Service Provider	3.13	It might be preferable to have stakeholder comments come to Verra to share with the project. This will reduce the cost of validation/verification for the project to demonstrate that stakeholder consultation has been undertaken.		Comments from the public consultation will be sent directly to Verra and then passed on to the assessor. Comments from the stakeholder engagement process must go directly to the project proponent so that they are aware of them and can respond accordingly during project design and implementation.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
189	Industry	3.13.1	More guidance needed here on how to demonstrate this and what is acceptable level (year 1, year 2 etc)		Verra will work to develop guidance and/or provide references to resources on impact identification and mitigation planning, such as causal chains. This may not be included in v1.0 of the <i>Standard</i> .
208	Industry	3.13.1	The standard should be able to demonstrate that all projects are achieving acceptable min standard and not to promote additional certification to demonstrate positive social and environmental impacts.		The <i>Standard</i> will require that all project proponents demonstrate the implementation of "do no harm" level safeguards in their projects. The use of additional certification is to provide an avenue for projects that go beyond the "do no harm" level safeguard requirements to demonstrate positive social and/or environmental impacts.
219	NGO	3.13.1	Think the encouragement of wastepickers		The "do no harm" level safeguard requirements will identify and mitigate all negative environmental and social impacts on the waste pickers involved in the project or ones that are stakeholders of the project.
222	Industry	3.13.1	"Note to readers – Plastic units may be labeled with additional standards and certifications on the Verra registry where both the Plastic Accounting Program and another standard are applied. The Verra website provides the list of standards that are accepted as plastic unit labels and the procedure for obtaining such plastic unit labels." Is this excluding other standards already available from the market?		No, other standards in the market may be included. The Verra website will provide the list of standards that are accepted as plastic credit labels and the procedure for obtaining labels.
209	Industry	3.13.2	Min requirements around Responsible Recruitment and Worker Living Conditions if provided by the project should be included		The following safeguard requirements will ensure that projects comply with and demonstrate safeguards around responsible recruitment and worker living conditions. Per 3.13.2(1) project proponents will have to identify and mitigate potential negative health impacts in the project. Project proponents will have to demonstrate that preventative measures have been put in place in the project to reduce these health impacts on the project actors and the community. Per 3.13.2(2) the project proponent will have to demonstrate that all project actors earn at least a regionally-determined living wage. Per 3.13.2(4) projects will also be required to identify and mitigate potential hazards and risks associated with the implementation of the project activity and ensure that relevant safety measures are implemented.
206	NGO	3.13.2 (2)	"This is good, but the loophole is buying plastic from the informal waste management industry. These humanitarian practices cannot be protected against. This is why we insist that projects cannot encourage local wastepicking industries"		The safeguard requirements in the <i>Standard</i> ensure that projects are required to identify and mitigate all potential health and safeguard impacts. Projects are also required to avoid any instances of forced and indentured labor, and to identify and mitigate all child labor. The safeguards also require that all project actors receive at least a regionally-determined living wage. These requirements will ensure that projects with informal waste management or waste pickers, where the project actors are underpaid or working in dangerous conditions, are not accepted by the Program. The safeguard requirements are designed to protect the rights of project actors and provide a pathway for projects to identify and mitigate negative impacts based on what is reasonable and relevant in the project area. The methodologies approved under the Program will also include applicability conditions that establish appropriate sources of material for activities such as recycling. This will help ensure that certain safeguards are upheld in the sourcing of material and/or end destination of material.
201	Service Provider	3.13.2 (2),(3)	The obligation to "mitigate" forced labor and child labor is not strong enough. These are more serious and should not be lumped into the same bucket as potential work place hazards.	The obligation should be to assess if it is a risk, and if it is the obligation should be to monitor and take steps to eliminate both of these.	The <i>Standard</i> requires that there shall be no forced labor in the implementation of the project activity. The safeguard requirements are being re-evaluated to ensure that they are appropriately rigorous and stringent. Projects are currently allowed to identify and mitigate child labor to accommodate for projects with child workers and provide them with support as they work to eliminate their reliance on child labor.
202	Service Provider	3.13.2 (3)	The definition of child labor should be expanded to contain more of the ILO definition the footnote links to avoid any ambiguity that Verra is limiting the definition by what is included in the footnote		The definition of child labor will be expanded to contain more of the ILO definition in the footnote in v0.2 of the <i>Standard</i> .

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
207	NGO	3.13.2 (3)	Do not encourage local wastepicking industries. Vast majority of waste pickers are children and women.		See response to Comment #206.
190	Industry	3.13.2 (5)	This seems to mean that we can ignore existing informal sector as long as we employ the same amount of people, even if they are other people. Is this correct?		<p>Along with the safeguard requirement for net job creation, project proponents will be required to undertake a local stakeholder consultation. In this process the project proponent will need to identify stakeholders, engage them prior to validation and provide them with a channel to raise concerns about potential negative impacts. The negative impacts on the informal sector will be avoided through their involvement in project design and planning of how to mitigate any job loss that might occur. However, we are reviewing the safeguard regarding jobs to ensure that we are not providing any perverse incentives for projects to leave the informal workforce behind.</p> <p>Per Section 3.13, project proponents will have to ensure that there is no forced or indentured labor in the project, and will have to ensure that all project actors, including project actors from the informal sector, earn at least a regionally-determined living wage. All project actors will also be working in an environment where potential health impacts and safety risks are identified and mitigated by the project.</p>
193	Service Provider	3.13.2 (5)	we believe there is a huge economic and environmental opportunity to be seized by going beyond “do no harm” to actively encouraging a positive social impact from the circular economy. This concerns particularly the estimated 15m informal waste pickers worldwide who make a living from collecting, sorting and recycling waste, mostly in the sprawling cities of developing countries where they account for 50-100% of waste collection. There are two main benefits of actively including waste pickers in plastic recovery and recycling projects in these geographies: Firstly, a potential damage of their livelihoods and economic value caused by competing, industrialised initiatives would be prevented. Secondly, cooperating with waste pickers tremendous value to such projects, thanks to their way of working which is i) very cooperative, ii) adapted to logistical realities in low-income residential areas and iii) offering flexible working hours. For instance, the municipality of Ambikapur in India managed to cut its waste management costs by 73% by including waste pickers into its system. Moreover, given waste pickers’ proximity to customers and communities, they play in some parts of the world, like in Brazil, an instrumental role to foster circular economy behaviours as waste segregation ambassadors.	<p>We would therefore encourage the promotion through this Standards of inclusive circular economy initiatives, that valorise positive social impacts leading to improved environmental and economic benefits. As outlined, in economies of the global South this entails including waste pickers in the value chains of plastic recovery and recycling projects i.e. leveraging local workforce, e.g. for segregation (instead of chemical industrial processes), and supporting their formalisation.</p> <p>Furthermore, this principle of inclusivity in the circular economy is equally valid in developed economies. Strong social and environmental value can be created for instance by recycling a higher share of plastic waste or treating it locally rather than exporting it. According to EuroStat, in 2017 only 42% of EU plastic was recycled. One third of Germany’s waste is recycled abroad. Estimates from Friends of the Earth Europe suggest that 500k jobs could be created in the EU if the 70% recycling target was met. The potential of setting up a local, inclusive circular economy is particularly attractive and relevant amidst the COVID-19 crisis, which is destroying employment and questioning the global circulation of goods.</p>	<p>Verra recognizes the benefit of the positive social and environmental impacts. In this version of the <i>Standard</i>, project proponents will be required to demonstrate that they are meeting “do no harm” level requirements. The <i>Standard</i> will include a statement encouraging project proponents to report social and environmental outcomes beyond what is required by the Safeguards and provide examples of such impacts. Verra will also provide support for projects to use other standards, such as the Sustainable Development Verified Impact Standard, to demonstrate positive impacts once the Program is launched.</p>
281	NGO	3.13.2 (5)	“Net job loss as a result of the project activity. Projects shall ensure net job creation as a result of the project activity.” This will not adequately cover impacts to the informal sector/wastepickers who would be unlikely to have formal jobs and would therefore not be considered in this assessment.	The informal sector is a critical component of many waste management systems and it is critical that new projects take this sector into consideration through the inclusion of stakeholder engagement elements, as well as clear mitigation plans for any potential negative impacts they may face.	<p>Verra agrees with the need for projects to account for the informal sector in the project development and implementation process. Along with the safeguard requirement for net job creation, project proponents will be required to undertake a local stakeholder consultation. In this process the project proponent will need to identify stakeholders, engage them prior to validation and provide them with a channel to raise concerns about potential negative impacts. The negative impacts on the informal sector will be avoided through their involvement in project design and planning of how to mitigate any job loss that might occur. However, we are reviewing the safeguard regarding jobs to ensure that we are not providing any perverse incentives for projects to leave the informal workforce behind.</p> <p>Per Section 3.13, project proponents will have to ensure that there is no forced or indentured labor in the project, and will have to ensure that all project actors, including project actors from the informal sector, earn at least a regionally-determined living wage. All project actors will also be working in an environment where potential health impacts and safety risks are identified and mitigated by the project.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
218	NGO	3.13.2 (5)	Some potentially impactful projects may actually reduce the need for labor as an element of making the project more sustainable or even feasible - e.g., the use of automation in material collection and processing that actually protects workers.	Include possible exceptions to this requirement under prescribed parameters.	While this could happen, the project proponent will be required to demonstrate that any job loss is compensated for by an increase in employment greater than the number of jobs lost. The project proponent will be required to ensure that the reduced need for labor is compensated for by employment for other functions within or outside the project. We will consider how this issue is being addressed in the pilot projects and determine whether the requirement should be modified.
217	NGO	3.13.4	What level of rigor and specificity do you anticipate with the measurement of negative environmental impacts and what are the boundaries of those metrics? What do you anticipate being the standards around "identify" and "mitigate" and "demonstrate"? Can an entity establish basic criteria for these issues that could be generalized to multiple projects?		The Program is currently re-evaluating the rigour and specificity of the safeguard requirements. The requirements are fairly broad to allow for projects to demonstrate compliance with the requirements based on what is feasible and reasonable in their context. An entity may create basic criteria for the demonstration of compliance with the requirements. However, the pathways and metrics that are used for demonstration might vary based on feasibility and relevance of each project.
196	NGO	3.13.4 (1)	3.13.3 Energy consumption should include a minimum requirement.	There should be a minimum energy efficiency requirement applied in order for any technology to be considered for a plastic credit. This minimum bar should be set in line with best practice standards for the relevant technologies. In some cases, some technologies might not be considered based on the high levels of energy use. One way to approach would be to set a threshold of a certain % below energy required to produce the equivalent virgin plastic.	This is a good point. Verra is looking into the option of determining a minimum energy efficiency requirement, including the option of setting a threshold of a certain % below energy required to produce the equivalent virgin plastic. Based on our research, we will update this 3.13.3 in the <i>Standard v0.2</i> .
223	Industry	3.13.4 (1)	Excessive consumption of energy: Not part of the scope, it can increase costs and complexity. It is not relevant if the activities run on renewable energy. GHG emissions resulting from energy use are relevant, not energy itself.		We have noted that this safeguard requirement is not relevant if projects run on renewable energy. This safeguard has been put in place for projects that do not have the ability to quantify and demonstrate the management of GHG emissions from their activities. Verra will re-consider the relevance of this safeguard and the burden it is likely to impose on projects.
188	NGO	3.13.4 (2)	If a generator is used for the project, assurances that the soil in that area does not become contaminated by hydrocarbon leakage need to be taken. This is surprisingly common		This risk is addressed by the safeguard on identifying and mitigating negative environmental impacts on soil quality.
197	NGO	3.13.4 (2)	3.13.4 GHG emissions should have a maximum allowable emission level	There should be a maximum GHG emission level applied in order for any technology to be considered for a plastic credit. This minimum bar should be set in line with best practice standards for the relevant technologies. In some cases, some technologies might not be considered based on the high levels of GHG emissions. Suggest a minimum % reduction compared to equivalent virgin plastic production be applied. Also a question - is it necessary to have both an energy and a GHG requirement? I would think GHG applied correctly would be sufficient.	Verra is looking into the option of determining a maximum GHG emission level, including a minimum % reduction compared to equivalent virgin plastic production. The GHG requirement is intended to account for aspects of the value chain that will not be accounted for by safeguard requirements on energy consumption (e.g., emissions from transportation of material). Safeguard requirements should ensure that projects do not consume an unreasonable amount of energy in their operations and that the GHG emissions in the value chain of the project are reasonable.
203	Service Provider	3.13.4 (2)	The requirements to reduce GHGs are quite onerous. Can a 3R project be combined with a VCS project to help reduce GHG reductions? Or is the obligation here to reduce intended to prevent GHG offset generation at the same time? Please clarify	Clarify how, if at all, 3R could work with VCS or other Verra GHG accounting standards	Avenues for the Plastic Accounting Program to be applied in parallel with the VCS Program will be considered and shared after the launch of the Program. The safeguard requirement 3.13.4(2) is to ensure that there is no unreasonable increase in GHG emissions as a result of the project activity. The safeguard does not require that the project proponent offset all GHG emissions arising from the project.
198	NGO	3.13.4 (6)	3.13.4 Biodiversity impacts may extend beyond the project boundary, need to include threatened and endangered species	It would be important to understand what the entire list of assessed impacts is. Also important to relook at the definition of the project boundary in this regard as there may be negative impacts during the transport phase of a project which is not currently considered to be within the project boundary. A specific requirement should be added to avoid impact on threatened and endangered species.	Each project will define for each part of Section 3.13.4 what it has assessed, and it will be up to the auditor to determine if that list is sufficient to meet the requirement. The project boundary includes the value chain of the material(s) managed, from source to its end of life after recovery or recycling; therefore, negative impacts of transport are within the project boundary. Avoidance of impact on threatened and endangered species will be included in Section 3.13.4 of the <i>Standard v0.2</i> .

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
220	Industry	3.13.5	Would "all stakeholders" be left to the discretion of an applying entity? Would it extend to prospective buyers of project credits?		<p>The commenter is correct that it is up to the project proponent to identify and engage all stakeholders either directly or through legitimate representatives. Prospective buyers will be able to read about stakeholder engagement in project documents, which will be publicly available.</p> <p>While prospective credit buyers may be deemed "interested stakeholders", they are not considered stakeholders that need to be engaged by the project as part of the design and ongoing communication process as they are not directly affected by the project's activities. We will clarify this in the <i>Standard, v0.2</i>, and add definitions of "stakeholder" and "interested stakeholder" to the <i>Program Definitions, v0.1</i>, which will be available for comment in the second public consultation period.</p>
244	Service Provider	3.13.5	Will there be more guidance on the type of stakeholders that should be involved in the stakeholder consultation?	Suggest providing examples of stakeholders that should be included in the stakeholder consultation.	We will include "stakeholder" as a defined term and include in that definition a distinction between "potentially affected stakeholders" -- those that should be invited to be involved in consultation -- and "interested stakeholders", who are not materially affected by the project's activities and therefore do not need to be included in the consultation.
245	Service Provider	3.13.5	What level of stakeholder consultation is expected for retroactive projects, particularly in the case of informal or small-scale community projects?	Please clarify the level of stakeholder engagement for required for retroactive projects, particularly for informal and/or small community projects.	<p>Projects that start before the launch of the Program should document any past stakeholder engagement to the extent possible. They should also describe plans for ongoing communications with stakeholders going forward.</p> <p>We recognize that documentation of activities that occurred prior to the official Program launch might not be as comprehensive as it will be for the same project going forward or for projects that start with the expectation of the level of documentation required by the Program.</p>
224	Industry	3.13.5 - 3.13.8	What stakeholders are we referring to?		Stakeholders are defined in footnote 1 of the <i>Standard</i> as stakeholders in the geographic vicinity of the project who could potentially be affected by project activities. This definition will be included in the <i>Plastic Standard Program Definitions</i> document.
247	Industry	3.13.5-3.13.8	Regardless of the comparison with the carbon market, this needs to be limited. We will always find someone who doesn't like what we are doing.		We consider it crucial to a project's success that directly affected stakeholders have an opportunity to contribute to project design and open communication with the project proponent at all times. We agree that there may be some stakeholders that don't like what a project is doing.
248	Industry	3.13.9-3.13.12	Even more complicated than the above [comment 247]. We can't address all comments of all the public in the project.		The public comment period gives interested stakeholders -- those not materially affected by the project's activities -- an opportunity to comment for a limited time. Project proponents are required to take these comments into account, but they do not always necessitate changes to project design or implementation.
176	NGO	3.14.3	Can I suggest that there is a requirement for some form of third-party paper trail like receipts for sold product?		Providing evidence such as receipts for material sold will be required during verification. Further details on this will be provided in the methodologies. However, Section 3.14.3 of the <i>Standard</i> and the methodologies should not be overly prescriptive so that projects have some flexibility in the type of evidence they can provide to support their accounting based on their circumstances.
268	Service Provider	4	Non-Binary Recognition	Having a tiered level (Silver/Gold/Platinum) of validation and/or verification will help to recognize exceptional actors and encourage innovation and advancement in the industry.	Verra will take this suggestion into account as we develop the assessment requirements, which will be included in the <i>Plastic Standard, v0.2</i> and the <i>Program Guide, v0.1</i> documents, as part of the second public consultation.
269	Industry	4	Validation process	For SEs (small enterprise) like ours, it would be important to have a lean validation process (while still checking the important stuff) so that we don't drown in process questions while keeping our operations running. In that sense it would be worthwhile thinking about a validation for LE (large enterprise), ME and SE ...	<p>Verra will take this suggestion into account as we develop the assessment requirements, which will be included in the <i>Plastic Standard, v0.2</i> and the <i>Program Guide, v0.1</i> documents, as part of the second public consultation.</p> <p>In particular, we will take into account how small- and large-scale projects have many different capacities and challenges.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
270	NGO	4	Need for social audits with active involvement of waste pickers	The validation and verification process should include social audits which ensure the active involvement of waste picker groups.	Validation and verification includes the assessment of projects against the requirements set out in the <i>Plastic Standard</i> document. The <i>Plastic Standard</i> includes environmental and social safeguards, such as local stakeholder engagement requirements, that all projects must meet. Verra will keep this suggestion in mind as we develop the assessment requirements, especially with respect to auditor competency. Assessment requirements will be included in the <i>Plastic Standard, v0.2</i> and the <i>Program Guide, v0.1</i> documents, as part of the second public consultation.
271	Industry	4	It is key to understand how this will work.		The Plastic Accounting Program assessment process and structure, including requirements for validation/verification, will be included in the <i>Plastic Standard, v0.2</i> and <i>Program Guide, v0.1</i> documents as part of the second public consultation. All projects will be assessed against the Program's requirements by accredited, independent third-party validation/verification bodies (VVBs). Verra will take into account the operational and structural differences between small- and large-scale projects in developing the assessment process and requirements.
273	Service Provider	4	Validation paid for and done by whom?	Who pays for both the validation and verification? Who are qualified to conduct them? Is it internal Verra? Is it a third party?	Audits (validations and verifications) will be conducted by accredited, independent third-party entities. All validations and verifications will also be reviewed internally by Verra staff. The assessment process and requirements will be included in the <i>Plastic Standard, v0.2</i> and <i>Program Guide, v0.1</i> documents as part of the second public consultation. The cost of validation and verification are paid for by project proponents.
275	Service Provider	4	Commercially sensitive information	The plastic waste management involves commercially sensitive information such as information on the sources and on vendors. However, these are essential for final realisation of plastic credits. This information can be verified by the validator and verifier and doesn't need not to be put up for public review. It is advisable to consider these aspects during the design of the the Project design document.	Project proponents have the option to protect commercially sensitive information by uploading a public project description and a private project description to the Verra registry. The public project description document will contain no commercially sensitive information, at the discretion of the project proponent. The private project description will be the version reviewed by the auditing body. More detailed information about the handling of commercially sensitive information will be in the <i>Program Guide, v0.1</i> document.
44	Service Provider	5	We note that the definition of recovery includes the removal of plastic waste 'out of the environment'. Will this exclude projects which undertake household collection, and therefore avoid plastic waste entering the environment? Could it also include projects that recover waste from non-sanitary landfills / open dump sites to avoid leakage or open burning?	Broaden the definition of recovery	The definition of recovery includes collection, allowing projects that undertake household collection to issue Waste Recovery Credits. Projects that recover waste from non-sanitary landfills/open dump sites to manage them in an appropriate manner are also included under recovery. We will revise the definition of recovery in the <i>Standard v0.2</i> to make sure this is clear.
45	Service Provider	5	Definition of terms	"Recovery" definition and credit value needs to be different between two broad classifications of recovery - (1) establishing new household and business waste collection services in areas that previously did not have waste collection to address an important root cause of environmental leakage and (2) the far less expensive, and less complex beach/litter clean-ups. For "Recovery" it says "diversion of plastic materials out of the environment" but not include the words "collection", although the recycling definition does. Would door-to-door waste collection be included in this definition? Recycling definition is quite broad and "generous" – anything that is not landfill or incineration. Would it for example include plastics-to-plastics and/or plastics-to-fuel? What about using plastics to make composite building materials or as input into asphalt roads? This definition needs for clarity. There may be an opportunity to align this with an internationally accepted definition of recycling such as ISO or EMF. Also there is an important distinction between the volume that is collected/sorted for recycling vs the volume that actually ends up as recycled plastic – for some situations that could be a 50%+ difference.	Collection activities, including door-to-door collection, are included in the definition of recovery. The definition of recovery will be revised to reflect the fact that both broad categories of recovery, door-to-door collection services and clean-ups, are included in the scope of recovery. The project description will reflect the specific nature of the project activity. Recycling will include chemical recycling that will enable the conversion of plastic to plastic. The <i>Standard</i> also currently includes the conversion of plastic to energy in recycling, however Verra will be looking into whether this needs to be reclassified. The use of plastic as input in building materials or in roads is considered a recovery activity, where the building and roads are considered an appropriate end destination for waste plastic. The definitions of "recovery" and "recycling" will be revised for clarity and aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
46	Service Provider	5	Definition of "Recycling"	The definition should be revised to more clearly encompass more than conventional plastic-to-plastic mechanical recycling. In addition, it should be narrowed to processing/conversion. Collection gets into the area of recovery; not all recycling requires separation; and stipulating marketing and assurance of ultimate use could make project design unworkable, thereby excluding valuable recycling activities. Following is a suggested revised definition: "The successful mechanical or chemical processing of plastic waste into usable products, excluding energy recovery through incineration."	The definition of recycling will be revised to explicitly include mechanical and chemical recycling and focus on the processing of the material. Collection and sorting will not be included under the scope of recycling. The suggested revised definition of recycling will be considered. The definition of "recycling" will be aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.
49	NGO	5	Definitions of Recycling and Recovery are not adequate	<p>Both of these terms are not adequately defined and should be aligned with existing definitions. Additionally, the role of chemical recycling should be defined. As should the roles of open and closed loop recycling and "downcycling" and "upcycling". For example, would plastic to roads be considered recycling? Recovery? would it be eligible?</p> <p>If energy recovery is included (arguably it should not be included for credits) a baseline comparison to assure that it is displacing non-renewable energy production is needed, and these credits need to be differentiated from recycling credits.</p> <p>Recovery on its own should not be considered for credits, as waste might be recovered and subsequently managed inappropriately (eg. Leaked, burnt, dumped) which undermines the purpose of this standard. It will be important to provide clear evidence that the recovered waste is actually in practice properly managed before a credit is issued.</p>	<p>The definition of recycling will be revised to explicitly include mechanical and chemical recycling, emphasizing that mechanical and chemical plastic to plastic are considered to be recycling. The conversion of plastic to energy is currently considered recycling but is under consideration for reclassification.</p> <p>The definitions of open loop recycling, closed loop recycling, downcycling and upcycling will be included. The conversion of plastic to roads will be considered to be recovery, where the roads serve as an appropriate end destination for the recovered plastic.</p> <p>Energy recovery will also be considered recovery, where only controlled incineration with energy capture will be allowed under the Program. The parameters of controlled incineration will be defined by the Program. Energy recovery will not be considered to be recycling, as is explicitly stated in the current definition of recycling in the <i>Standard</i>. The Program is considering an applicability condition for energy recovery where projects will be required to demonstrate that there is no reasonably accessible recycling facility from the project. This can be expanded to include an applicability condition for projects to demonstrate that they are only displacing non-renewable and/or less clean energy production.</p> <p>Recovery projects will be required to demonstrate that waste is being managed in an appropriate manner after recovery, where appropriate end-of-life options will be defined by the methodology. The use of discount factors is being considered to account for potential leakage of recovered material into the environment from these appropriate end-of-life destinations.</p> <p>The definitions of "recovery" and "recycling" will be aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.</p>
56	Service Provider	5	additional definitions and concepts	2. 'data flow activities' mean activities related to the acquisition, processing and handling of data that are needed to draft a verification report	Verra will consider including this definition.
59	Industry	5	Recycling and Recovery need to be defined.	We suggest to use the ISO 1860 definitions	The definitions of "recovery" and "recycling" will be aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
 Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
62	NGO	5	Comment on recovery	<p>I would suggest removing the term "successful" as it adds complexity and creates questions about what constitutes "successful" recovery.</p> <p>Recovery on its own should not be considered for credits, as waste might be recovered and subsequently managed inappropriately (eg. Leaked, burnt, dumped). It will be important to provide clear evidence that the recovered waste is actually in practice properly managed before a credit is issued.</p> <p>It will also be really important to include more detail in this definition as terms like "energy capture" could be interpreted in many different ways. We would need minimum standards for how much energy is captured etc...</p> <p>If incineration with energy capture is allowed, then it will be really important to set minimum standards for things like energy consumption, GHG emissions and toxic waste production for each of the technologies considered.</p>	<p>The definition of recovery will be revised to be more specific and avoid the use of the word "successful". The definition of "recovery" will be aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.</p> <p>Recovery projects will be required to demonstrate that the recovered waste has reached an appropriate end-of-life destination, where these destinations will be defined by the methodology.</p> <p>The Program is planning on including parameters around what can be classified as acceptable waste-to-energy or controlled incineration with energy capture. The environmental safeguards in the <i>Standard</i> will ensure that energy capture technologies (and other acceptable technologies) used by projects meet the requisite standards for energy consumption, GHG emissions and toxic waste production.</p>
63	NGO	5	Comment on recycling	<p>I would suggest removing the term "successful" as it adds complexity and creates questionrecyclins about what constitutes "success".</p> <p>There needs to be a lot more detail around this definition. Not every form of recycling should be acceptable, some forms of downcycling might not be acceptable to WWF.</p>	<p>The definition of recycling will be revised to avoid the use of the word "successful" and to be more explicit about the types of project activities allowed. The definition of "recycling" will be aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.</p>
64	Service Provider	5	Plaste waste: Suggest to make a clarifying addition to the first sentence of the definition to avoid any potential circular readings	<p>suggest revise first sentence of the definition to read "Any plastic materials that are unused and rejected as worthless or unwanted prior to the commencement of the project activity."</p>	<p>While this revision helps clarify the nature of the plastic waste being managed by projects, it would prevent the plastic that the project activity is unable to manage or waste generated as a by-product of the project activity to be classified as plastic waste. The existing definition encompasses unusable plastic (i.e., plastic waste, generated prior to and during the project activity).</p>
65	Service Provider	5	Recovery: The definition is clunky and unclear - what are the categories of recovery activities? i) landfill disposal; ii) recycling; iii) collection; iv) reuse. OR i) landfill disposal; ii) recycling; iii) collection and reuse	<p>suggest making this clearer with different punctuation or clearly numbering the types of eligible recovery activities</p>	<p>The definition of recovery will be revised to be more explicit about the activities that are included under recovery. The methodology will further describe the acceptable end-of-life destinations for recovered plastic, defining the parameters of these destinations on a regional basis. Currently, the broad categories of acceptable end-of-life destinations are sanitary landfills, waste-to-energy, recycling and reuse.</p> <p>The definition of "recovery" will be aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.</p>
66	Service Provider	5	Recycling: why is "marketing" included in the definition as a requirement?		<p>The intention of the definition of recycling is not to list out marketing as a requirement. The definition will be revised to more explicitly state the nature of project activities that are considered to be recycling activities by the Program.</p> <p>The definition of "recycling" will be aligned with either ISO 472 Plastics -- Vocabulary or ISO 18604 Packaging and the environment -- Material recycling.</p>
67	Service Provider	5	We note that the definition of recycling includes the 'ultimate use of plastic that otherwise would have been disposed of in the environment or incinerated for energy capture'. Can you provide examples of activities that could be included under this category?	<p>Include exmaples of recycling activities</p>	<p>The Program will include examples of recycling activities with the definition of recycling.</p>

Comments Received During the 26 February - 26 April 2020 Public Consultation on the
Plastic Recovery and Recycling Project Accounting Standard, v0.1: Verra Responses 29 May 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
276	NGO	6	Mention the names of the organizations in the PSDC rather than names of collaborators		Verra typically includes both the individual name and their organization when listing technical working group or advisory group members, unless and individual does not wish to be listed. V1.0 of the <i>Plastic Standard</i> will acknowledge the 3RI and the PSDC as bodies, but will not list specific members. The roles of Verra, the PSDC and the Steering Committee are outlined on the Governance and Development page of the Plastic Accounting Program website: https://verra.org/project/plastic-accounting-program/governance-and-development/
277	NGO	6	Make the role of Verra, PSDC and 3RI members clear in the standard development process		The roles of Verra, the PSDC and the Steering Committee are outlined on the Governance and Development page of the Plastic Accounting Program website: https://verra.org/project/plastic-accounting-program/governance-and-development/