

Comments Received During the 6 October to 5 November 2021 Public Consultation on the *Plastic Waste Collection Methodology, v1.1* Verra Responses

The original public consultation questions may be found [here](#).

#	Organization	Organization Type	Topic	Section	Question	Comment	Proposal from Commenter	Response
1	Delterra	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	1	<p>1(a) My worry about unmanaged landfills/dumps is that waste ultimately ends up entering the environment from these sites. Many landfills sit beside the ocean or water ways and waste regularly washes into the ocean. Also, when not covered regularly, waste often blows off the top of dumps. If we are to include non-sanitary landfills in the crediting system, they should be audited to ensure waste is not entering the environment directly as a result of dumping in these locations.</p> <p>1(b) The risk that projects don't use the best available landfill is real. This can be mitigated by requiring an external audit which you could add to the existing audit preview. It can likely also be checked or verified using remote sensing data e.g. Global Plastics Watch (https://www.youtube.com/watch?v=LcEpgcBsf8).</p>		<p>(a) Noted, thank you. Please note that the revisions are only applicable to criteria h-j (i.e., leachate drainage system, sanitary lining and/or post-closure care requirements). Other criteria are still required in order to ensure leakage of waste back into the environment does not occur.</p> <p>(b) Thank you. Verra acknowledges the importance of robust third-party audit to ensure projects are using the best available landfill. In addition to the revised requirements, Verra will continue to monitor projects applying the methodology and will adjust methodological requirements in the future, where changes are necessary and appropriate.</p>
2	Delterra	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	2	<p>2(a) yes</p> <p>2(b) yes</p> <p>2(c) I would think evidence that there is not other potential destination for plastics e.g., no market for the materials, no other landfill, and no environmentally sound option like cement co-processing. Landfilling should be the last destination for waste on the waste hierarchy and unmanaged landfills should technically not be considered at all. Given we are now considering including them, their use should absolutely be time bound and projects should be required to ensure they are not being lazy about the potential to reuse the plastic in some other way. My greatest fear in including landfills at all is that projects simply collect and dispose of the material without trying to build the recycling ecosystem at all. Plastic collection credits were not created to subsidize waste collection and dumping.</p> <p>2(d) yes, this should be a temporary solution to avoid simply subsidizing waste collection programs with no intention of recycling.</p>		<p>Applicability Condition 7 now includes an exception to landfill criteria h-j (i.e., leachate drainage system, sanitary lining and/or post-closure care requirements) for projects that are able to 1) demonstrate that a landfill meeting these criteria is not reasonably accessible nor operationally and economically sustainable for the project and 2) establish a plan to phase out the use of any landfill not meeting all criteria (a-j) by the end of the first crediting period.</p> <p>At crediting period renewal, projects that applied the exception must demonstrate that the landfill not meeting all criteria (a-j) is no longer in use by the project. Any plastic waste collected by the project and sent to a landfill not meeting all criteria (a-j) must be excluded in the quantification of collected plastic waste and is ineligible for crediting.</p> <p>Verra determined that the length of a crediting period (i.e., 7 or 10 years) is an appropriate amount of time for a project to phase out the use of a landfill that does not meet all of the criteria by finding an alternative landfill or using another appropriate end destination (e.g., reprocessing, recycling).</p> <p>At this time, Verra has not established or prescribed a waste management hierarchy in the methodology. However, Verra will consider phasing out certain eligible end destinations in future updates to the methodology.</p>
3	Delterra	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	3	No. This will likely be beyond the control of most projects.		Noted. The criterion requiring landfills to be staffed by trained and qualified personnel has not been included in the revised methodology.
4	SYSTEMIQ	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	1	<p>1(a) The proposed revision reflect the challenging conditions project proponents face when implementing projects in low income countries or countries without the appropriate existing waste infrastructure. Countries which lack appropriate waste infrastructure are the ones which would benefit the most from new plastic waste management projects.</p> <p>1(b) Based on the proposed revisions, the project proponents is responsible for providing evidence that no other reasonable alternative end-of-life options exists. These evidences will be assessed and reviewed by the validation/verification body (VVB). An open and transparent conversation is necessary with the VVB to assess what can be considered as operationally and financially "feasible"</p>		Thank you for the feedback.

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5	SYSTEMIQ	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	2	<p>2(a) Project proponents have often very little influence over the decision affecting the infrastructure necessary to conduct their waste management operations. Decisions regarding landfill constructions and rehabilitation are usually made by a government agency whose interest may not be entirely aligned with the project proponents. As such a temporal target would be outside of the project proponent's control. Also certain plastic materials and formats have no value in existing markets and therefore no other option but to dispose in landfill.</p> <p>2(b) Best effort should be made by the project proponent to phase out the use of landfills as soon as another viable alternative presents itself. Such an opportunity would not be dependent on the credit period and would likely differ widely from one location to another. We would suggest instead to make this effort conditional on the availability of an alternative.</p> <p>2(c) The following evidence should be provided: evidence that no alternative landfills are reasonably accessible to the project. If an alternative landfill is accessible, evidence that the use of alternative landfill would threaten the economic sustainability of the project and/or evidence that the use of alternative landfill would materially reduce the expected plastic collection/recycling activities due to the additional operational constraints</p> <p>2(d/e) No. If the aim of plastic credits is to incentivise the collection of additional plastics that would otherwise pollute nature, and if projects are verified to successfully do this; and they have little if any influence on the building of multi-million dollar landfills or the governance and operations of those landfills and no viable alternatives exist for those materials (which can be verified), projects should be eligible to continue to participate in the Plastic Program. Otherwise plastic environmental harm from ceasing operations will be more severe than if plastic is collected and placed in a government landfill, even if not managed at global standards. Verra could though require projects to show that there is a credible path towards a better alternative than an unmanaged landfill over time - or what they would need from local government and others to build a credible path. As landfill management is outside of the control of most projects, it would be helpful if Verra, and/or Verra's partners could help them find/build alternatives that are technically, economically and environmentally feasible.</p> <p>2(e) Perhaps Verra or other interested party can work with the Project to try to identify (and/or help build) any alternative solutions that are technically, economically and environmentally feasible for them to use.</p>		<p>Thank you very much for the input. Please see the response to comment #7.</p> <p>Verra acknowledges that landfills are often the best available management option for disposing of certain types of collected plastic waste, particularly low-value or hard to recycle material types. In addition, disposing of collected plastic waste in a managed landfill is preferable where the alternative is plastic waste remaining in the environment.</p> <p>Although Verra recognizes that the governance and operation of landfills are often beyond the project proponent's control, the Plastic Program aims to incentivize improvements in regional waste management infrastructure. Verra will continue to monitor projects applying the methodology, and will likely adjust methodological requirements in the future, where changes are necessary and appropriate. Continuous improvement is a principle of the Plastic Program.</p>
6	SYSTEMIQ	Project Developer	Applicability Conditions - Appropriate End Destinations		3	<p>3(a) No. This is outside of the scope of what a project has influence on. In addition, its hard for a project to evaluate how "trained" or "qualified" landfill staff are.</p>		<p>Noted. The criterion requiring landfills to be staffed by trained and qualified personnel has not been included in the revised methodology.</p>
7	BVRio	NGO	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	1	<p>1(a) As proposed in the methodology revision, the project proponent shall establish a plan to phase out the use of landfill by the end of the 1st crediting period (instead of minimizing). The focus should be in phasing out, not reducing or minimizing. The shift needs to be 100%. The revisions seem appropriate. The crediting period, either 7 or 10 years, are long enough for development of new infrastructure or new partnerships for disposal. In the case- where there is a possible increase in the operational costs, due to better end of life destination, these additional costs can incur in higher prices for the plastic credits sold in the market.</p> <p>2(b) There are risks, but these could be potentially mitigated by: (i) Ensuring projects describe the reasons for using the landfill that do not meet the minimum requirements set out in the Collection Methodology. (ii) Ensuring projects describe the phase-out plan</p> <p>Lastly, the VVBs, composed by auditor with local expertise, should be able to assess during the validation if these "deviations" are appropriate or not to the context.</p>		<p>Applicability Condition 7 now includes an exception to landfill criteria h-j (i.e., leachate drainage system, sanitary lining and/or post-closure care requirements) for projects that are able to 1) demonstrate that a landfill meeting these criteria is not reasonably accessible nor operationally and economically sustainable for the project and 2) establish a plan to phase out (rather than "reduce" or "minimize") the use of any landfill not meeting all criteria (a-j) by the end of the first crediting period.</p> <p>At crediting period renewal, projects that applied the exception must demonstrate that the landfill not meeting all criteria (a-j) is no longer in use by the project. Any plastic waste collected by the project and sent to a landfill not meeting all criteria (a-j) must be excluded in the quantification of collected plastic waste and is ineligible for crediting.</p> <p>Verra determined that the length of a crediting period (i.e., 7 or 10 years) is an appropriate amount of time for a project to phase out the use of a landfill that does not meet all of the criteria by finding an alternative landfill or using another appropriate end destination (e.g., reprocessing, recycling).</p>

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8	BVRio	NGO	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	2	<p>2(a) Yes, incentives for continual improvement are positive. Although not 100% dependent on projects, the time-bound plan would make projects to look for new disposal partnerships.</p> <p>2(b) Yes. Actually a 7-year period would be the most suitable. While it would mean the 1st crediting period (for projects with 7 years crediting period), it would also allow changes to occur in projects operating within a 10 year crediting period.</p> <p>2(c) Explained briefly above. It should be a sum of: (i) Description of the reasons for using the landfill that do not meet the minimum requirements set out in the Collection Methodology (and therefore lack of access to end of life destinations that meet the criteria) (ii) Use of auditor's local expertises to assess case by case</p> <p>2(d) Yes. The program was established to raise the bar (not to incentivize the status-quo).</p>		Please see the response to comment #7.
9	BVRio	NGO	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	3	<p>3(a) Not applicable. Very similar to what lead to the revision of this methodology- although important, this is completely out of project's control. The landfills are operated by third-party organisations (and most of the cases, even local governments). Projects will not have the influence to require trained staff - specially because it incurs cost for these facilities operators- and project will not be able to contribute with it.</p>		Noted. The criterion requiring landfills to be staffed by trained and qualified personnel has not been included in the revised methodology.
10	South Pole	Service Provider	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	1	<p>1(a) Agree with the proposal to incentive the reduced use of landfill over time.</p> <p>Recommend defining 'reasonably accessible', and allowing project proponents to propose the best option based on their specific circumstances (e.g. plastic waste type, volume, project location, site capacity, local politics) etc.</p>		<p>A landfill is considered reasonably accessible where there are no significant geographic, environmental, financial and/or operational impacts or barriers preventing its use as an end destination for plastic waste collected by the project.</p> <p>However, the revised methodology does not prescribe what may be considered "reasonably accessible". Instead, project proponents should provide evidence that an alternative landfill (or other appropriate end destination for collected plastic waste) is not reasonably accessible to the project. The VVB will determine whether the justification is appropriate.</p>
11	South Pole	Service Provider	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	2	<p>2(a) Temporal target is aligned with incentive to reduce use of landfill over time, however, recommend that project proponents are able to set their own timeframe. Methodology may provide guidance on recommended timing. If the transition time is not feasible, the project should be able to demonstrate why not and their alternative plan.</p> <p>2(b) Recommended time frame may be linked to crediting period. Enable justification and alternative option if this is not the possible.</p> <p>2(c) Evidence could include demonstration of (no) alternative landfill sites within an economically feasible km radius of the project. Potentially also, photographic evidence of the state of other waste disposal sites within this radius & justification of why they are not suitable / possible (e.g. capacity limits).</p> <p>2(d) Project should be able to justify why the change was not achievable in the previous crediting period. Potentially also outline what would need to happen to make this change possible.</p> <p>2(e) If no, consider excluding that waste type from credit eligibility.</p>		Please see the response to comment #7.
12	South Pole	Service Provider	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	3	<p>3(a) Yes, however, level of proofs for this may be challenging.</p> <p>3(b) Staff require training on specified topics, use of H&S equipment - could follow a similar route as the safeguards within the Plastic WR Standard.</p> <p>3(c) Yes, it may not be feasible in all cases, e.g. where landfill operator will not provide - or does not have records of - the supporting information</p>		Noted. Due to challenges associated with providing a broadly applicable definition of "trained" and "qualified", and considering that landfill staffing decisions are often beyond the project proponent's control, this criterion has not been included in the revised methodology.
13	South Pole	Service Provider	Definitions - Waste processing	Section 3	N/A	<p>Since recycling methodology will also include chemical recycling, remove references where it only refers to mechanical recycling. Either say mechanical and/or chemical recycling or recycling</p>		References to mechanical recycling have been updated to read "mechanical and/or chemical recycling" or "recycling", as appropriate.

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14	South Pole	Service Provider	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	N/A	<p>It is not clear:</p> <p>(a) why the specified criteria only have been selected for this exception and not all in the list (e.g. mechanical compacting)</p> <p>(b) what happens in the 'landfill' site under assessment meets some but not all of the criteria.</p> <p>(c) what happens when a site is available but is not accessible by the project (e.g. capacity is limited, priority given to other waste streams etc.)</p> <p>(d) How would an auditor check that plastic waste going is being reduced over time. Will reduction in waste refers to waste collected from the region or total.</p>	Justify why certain measures have been selected and not others	<p>(a) These criteria were selected based on specific input Verra received from project proponents.</p> <p>(b) The revised Applicability Condition 7 makes clear that the exception applies only to criteria h-j. Projects sending collected plastic waste to landfill must meet criteria a-g, with no exceptions, in order to be eligible to participate in the Plastic Program.</p> <p>(c) The project proponent must demonstrate to the VVB, using credible evidence, why the site is not reasonably accessible. Barriers to accessibility could be, for example, environmental, geographic, economic or operational in nature.</p>
15	South Pole	Service Provider	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	N/A	<p>[Leachate drainage and treatment system]</p> <p>(a) The landfill system should be as per the relevant national/regional/local regulations. If a landfill is not abiding by those regulations, it should be allowed as the end destination. It may be added that in case there is lack of national/local regulations then leachate and/or treatment should be followed.</p> <p>(b) Reference to the crediting period is incorrect. 'the project proponent shall 20 establish a plan to phase out use of the landfill by the end of the first crediting period'. It assumes that CP would always be renewable, but does not consider fixed CP as per 3.6.1 of plastic standard. Also, 7 years is long of a time to have a establish measures. Where such as system could be established in a lesser timeframe, the meth and thus the voluntary market finance may provide perverse incentive to not establish a system for a period of 7-10 years.</p>	Should either remove the requirement which is added or provide more robust requirements.	<p>Applicability Condition 7 requires projects to demonstrate "compliance of the activities of the end destination facility with relevant local or national regulations". In addition, the first landfill criterion (a) requires that a landfill is "government recognized or affiliated". There is no exception to this criterion.</p> <p>Verra determined that the length of a crediting period (i.e., 7 or 10 years) is an appropriate amount of time for a project to phase out the use of a landfill that does not meet all of the criteria by finding an alternative landfill or using another appropriate end destination (e.g., reprocessing, recycling).</p>
16	South Pole	Service Provider	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	N/A	[Sanitary lining]	Same as above	Please see the response to comment #15.
17	South Pole	Service Provider	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	N/A	[Post-closure care requirements]	Same as above	Please see the response to comment #15.
18	ClimeCo	Service Provider	Applicability Conditions - Sources of Collected Waste	Section 4, AC 3	N/A	<p>Many developing countries (that are not LDCs or SIDS) have poor formal waste management facilities and thus have low plastic waste collection penetration that would make them eligible to use the plastic methodology. These countries may have a methodology-approved landfill that formal sector waste (including plastic) is destined for, but the waste first arrives at an intermediate transfer site. Although these sites may be established by the formal sector, they meet the methodology definition of dumpsite as they are overflowing and uncontrolled for physical loss or leachate. Moreover, there are inadequate resources to transport the waste to the landfill location. This plastic has a high risk of ending up in the environment even if the formal sector's goal is for it to be collected and sent to a landfill. In practice, this means that while the dumpsite may not be the intended end destination for the plastic waste, much of it is never ultimately transferred to a landfill. We would like Verra to clarify that these intermediate dumpsites are eligible as "potential sources of plastic waste that would have been left or dumped in the environment", and therefore be eligible for plastic collection credits.</p>	<p>We propose that intermediate dumpsites be eligible plastic sources if it can be verified with reasonable assurance by a Validation/Verification Body that the sites pose a high risk of plastic being left in the environment rather than transferred to a landfill. Along with sources such as government, third-party research, and academic papers, which may not be available at all locations, we suggest the following sources be considered: attestations from local leaders/government/waste management officials stating the risk of plastic escaping the formal sector dumpsites, and documents that show the percentage of the region's waste generation (this could be used to show that waste management in the region is inadequate). Other supplemental evidence such as photographs could also be useful. For additional assurance, Verra could also consider a requirement such that if plastic is collected from an intermediate dumpsite, it must be taken to a more beneficial end site than a landfill. Examples may be reprocessing, recycling, and incineration with energy recovery. This requirement would create an added layer of assurance that the project activity is above-and-beyond any business as usual end use for the plastic in the dump sites.</p>	<p>Noted, thank you. Footnote 13 on p. 9 was added to clarify that an eligible source of collected plastic waste may include any site or source (e.g., intermediate transfer site) that is not an appropriate end destination as defined in Applicability Condition 7 of the methodology.</p> <p>Furthermore, Verra acknowledges that there is a wide range of credible and verifiable evidence that may be used to demonstrate compliance with Applicability Condition 3. The language has therefore been revised to include "or other credible evidence".</p>
19	ClimeCo	Service Provider	Additionality - Penetration Rate	Section 7, Step 3a	N/A	<p>It is not clear if plastic waste collection includes: all plastic that is being collected along with trash and taken to an approved landfill, or only plastic that is specifically separated from trash and taken to other end destinations (reprocessing, recycling, incineration with energy recovery).</p>	We propose that Verra consider clarifying the definition of "plastic waste collection."	<p>"Plastic waste collection" includes plastic that is collected along with trash (e.g., other MSW) and taken to an appropriate landfill, and plastic that is separated from the waste stream and taken to other appropriate end destinations, such as reprocessing, recycling or incineration with energy recovery.</p> <p>No changes have been made to Section 7 of the methodology at this time. However, Verra will consider this comment during future revisions to the methodology.</p>

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20	ClimeCo	Service Provider	Applicability Conditions - Measurement of Collected Plastic Waste	Section 4, AC 5	N/A	We appreciate the intent of the "dry weight" requirement. It's important for collected plastic to be dry to avoid weight overestimation. However, Footnote 13 defines "dry weight" as a scientific measurement that should be achieved, and suggests that Project Proponents use laboratory or national/internationally recognized methods. This is impractical to implement and measure on the scale of a plastic collection project. For example, visual checks for dryness and dry-to-touch are accepted in the pharmaceutical and paint and coatings industries. These descriptions would be easy to understand for the people collecting and weighing the plastic, and practical to apply in the field.	We propose that Verra remove the "dry weight" definition footnote 13. We also propose that Verra include the following suggestions for ensuring the dryness of the plastic before weighing: Plastic bottles or containers must be empty. The collected plastic is visually checked for dryness or dry to the touch. Collected plastic has the opportunity to drain freely prior to being weighed.	Thank you for this input. Footnote 13 on p. 9 has been revised to clarify that projects may use a variety of methods to assure the collected plastic is dry prior to weighing. Any method used must reliably result in the collected plastic being reasonably dry and free of any non-plastic debris.
21	Africa Carbon & Commodities	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	1	See detailed response to these questions below in #2. For our project in West Africa there is not a risk that the Project may not use the best available and most economically or operationally sustainable landfill site. It is recommended that Verra strongly encourages that a sanitary landfill is utilized but allows for the next 3 crediting periods (21 years) unsanitary landfills be allowed if there is no other viable option and the landfills are operated by the State.		Please see our response to your comment #22 below.
22	Africa Carbon & Commodities	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	2	<p>Our project in Senegal, West Africa and planned in other West African countries, works with waste pickers who make their livelihood picking through and sorting trash at the largest landfill, Mbeubeuss, in Senegal: 114 hectares, with over 2,500 waste pickers and collectors and over 2,000 tons of waste dumped daily by hundreds of trucks and horse carts. The waste pickers are the poorest of the poor that make a living selling different sorted waste, with plastic being a large part of this waste collection. The waste pickers have organized into an Association called Bokk Diom (which means in Wolof the local language – Together and Determined).</p> <p>There has been talk for many years from the Senegalese Government to close the landfill. The latest proposal is to shutdown Mbeubeuss in 2025 and design and create a waste collection center. The World Bank has provided a 125 million USD credit for solid waste management in Senegal, which includes a waste collection center. However, at this time there has been no advancement and it is unlikely that the landfill will be closed as this has been a subject battled around for over twenty years with various expensive funding initiatives that have never been realized. It is difficult to relocate the 112-hectare landfill as besides NIMBY issues with the population there is a lack of available space.</p> <p>There is not one landfill in Senegal that meets the following criteria proposed by Verra that has a leachate drainage system or similar measures, a sanitary lining or similar measures, and the possibility to be capped. As the State manages the landfills in Senegal it is highly unlikely that in the near (next 21 years) future such sanitary protections will be in place. As such, the project proponent is unable to establish a plan to phase out use of the landfill by the end of the first crediting period. And yet the goal of the plastic credits is to help the most vulnerable. In countries like Senegal this objective would not be able to be met if Verra landfill criteria requires a sanitary landfill. With plastic credits – environmental, social and safety protections could be put in place and solutions found that would allow the waste pickers to continue their livelihood in a dignified and safe way.</p> <p>It is recommended that Verra strongly encourages that a sanitary landfill is utilized but allows for the next 3 crediting periods (21 years) unsanitary landfills be allowed if there is no other viable option and the State (government) controls the landfills.</p>		<p>Thank you for your feedback. Unsanitary landfills remain an eligible source of plastic waste. The proposed revisions update the landfill criteria, which set out the requirements a landfill must meet in order to be considered an appropriate end destination under the methodology. Any end destination that is not listed in Applicability Condition 7 is considered an eligible source of collected plastic waste as there is a significant risk that inappropriately managed plastic will remain in or leak back into the environment, resulting in negative environmental and health impacts.</p> <p>Please see the response to comment #7 for further information about the revisions to Applicability Condition 7.</p>
23	Africa Carbon & Commodities	Project Developer	Applicability Conditions - Appropriate End Destinations	Section 4, AC 7	3	In Senegal, the State operated garbage trucks dump waste at State designated landfills but the State does not manage the waste at the landfills. With the largest landfill, Mbeubeuss, the State since 2020 has placed one State Agent at the Landfill to oversee and provide security. However, at all other State designated landfills there is no staff to manage them. Thus if the criteria is applied that requires qualified personnel to staff landfills over 20% of waste in Senegal would not be able to be included for plastic credits.		Noted. Due to challenges associated with providing a broadly applicable definition of "trained" and "qualified", and considering that landfill staffing decisions are often beyond the project proponent's control, this criterion has not been included in the revised methodology.