

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

Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
5	Other	Additionality	7.1	Yes, EPR schemes in place need to be considered.	In a future version, need more guidance on how to consider EPR schemes as part of regulatory surplus considerations.	Your comment on the importance of consideration of EPR schemes is noted. The <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> contains further guidance on how to address EPR schemes under the regulatory surplus assessment. This includes guidance on what constitutes a mandatory EPR scheme, and how voluntary schemes should be treated.
6	Other	Additionality	7.2	The threshold of 150 tonnes/year seems appropriate.		Your point is noted. However, the positive list has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> such that a threshold value is not used to determine which projects can use the positive list. Instead projects located in certain types of countries and managing certain types of plastic waste can now use the positive list.
8	NGO	Additionality	7.1	I read the collection methodology and makes a lot of sense to assess collection rate (as a public service) this way. But is not clear how this is related to a private enterprise as mechanical recycling (to be discussed)		Please refer to the response to comment #5.
9	NGO	Additionality	7.3	For UBC recycling activities, should use data for UBC or all types of plastic?		The <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> encourages project proponents to use the best available data, however distinction by polymer type is not required in this step. The <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> includes further clarification on the nature of data and calculations required in this step.
16	NGO	Additionality	7.3 and 7.4.8(2)	Is the calculation of the technology penetration rate supposed to be by material type or for all plastic waste?	Language needs to be revised in these sections (and in the decision tree if needed) to clarify this	This section has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> to clarify that the penetration rate is supposed to be the average penetration rate of all the material types (including composite materials) managed in the project activity. In the case that a project activity includes a specific material type for which reliable publicly available information indicates that the penetration rate for that material type is higher than the average penetration rate calculated for all the material types in the project activity, the calculation of the penetration rate should focus on this material type only.
17	NGO	Additionality	7.3	Should projects that are undergoing validation be included the calculation of the total installed recycling capacity?		The calculation of total installed recycling capacity to determine the penetration rate of recycling activities should only take into account projects that are implemented without additional revenues from credits. Projects undergoing validation should not be included in this analysis, following common practice analysis from the Clean Development Mechanism (CDM).
18	Service Provider	Additionality	7.1	Methodology refuses any project located in a region where recycling is mandatory	I do highly consider this statement to be reformulated: for those regions where recycling is mandatory, methodology assessment for additionality scope should focus on maximum % of material that is legally required to be recycled. If a project technology ensures that this threshold is overcome, this project technology should be regarded as additional.	The regulatory surplus requirement is included to ensure that the activities taking place would not have taken place in the absence of the project. This section has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> to highlight that if a project activity exceeds a legal threshold for recycling, the project proponent can provide proof of this to demonstrate regulatory surplus.
24	Industry	Additionality	7	Decision tree	Description of project scale in the decision tree, viz. "project recycling capacity" is not consistent with the description in section 7.2, which is the "total installed capacity of the recycling facility". Kindly provide a definition of project recycling capacity.	Please refer to the response to comment #6

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25	Industry	Additionality	7.1	Treatment of EPR	<p>Pg 12, lines 6-9:</p> <p>1. Please specify what is the requirement for listing voluntary schemes (including voluntary EPR) when the regulatory surplus requires ensuring compliance only with mandatory laws?</p> <p>2. We understand that EPR schemes are applicable for brands and not for recycling facilities. So kindly provide guidance on how to measure non-compliance of recycling facilities under such EPR schemes</p>	<p>The <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> includes further clarification on the treatment of EPR schemes.</p> <p>The methodology requires that all voluntary schemes (including voluntary EPR schemes) be listed as part of this step to enable the validation/verification body to check that the listed schemes do not constitute a mandatory scheme.</p> <p>Project proponents must determine how best to demonstrate non-compliance in their applicable region in a manner that can be verified by the auditor should there be schemes that are mandatory but not complied with.</p>
26	Industry	Additionality	7.2	Step 2a- Installed capacity of recycling facility	<p>1. The methodology states the following: "Determine the total installed capacity of the recycling facility, including all relevant material types that will be recycled under ideal conditions given by the manufacturer's equipment specifications. If the recycling capacity depends on the mix of different material types, the highest possible capacity shall be used as a conservative approach." - As per the proposal in this section, please clarify if the intention is the following: Consider a recycling facility that has an installed capacity of 100 tonnes for plastic and 500 tonnes for glass. Is it being proposed that we should consider the installed capacity as 500 tonnes?</p> <p>2. Is it prudent to consider the installed capacity, or rather capacity utilization (eg. maximum for last 3 years or so)?</p>	<p>Your comment on the relevance of installed capacity is noted. Section 7.2 has now been revised and no longer requires determination of recycling capacity. The <i>Plastic Waste Mechanical Recycling Methodology, v 1.0</i> now explicitly states when, and under what conditions, capacity utilisation may be used in place of total installed recycling capacity for relevant steps.</p>

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27	Industry	Additionality	7.2	project scale of 150 tonnes/annum may be too small	<p>150 tonnes/year as the threshold is too small, and may not be the correct representation of the threshold for the following reasons:</p> <ul style="list-style-type: none"> - It is expected that the financial assessment as described in the note is based on a cost-benefit analysis. It would be helpful to provide link to the financial assessment to understand the cost and price assumptions used. Also, since there is no precedence or historical prices for plastic credits available in the market, basing this analysis on hypothetical prices might be problematic, since slight price variations may skew this threshold - Determination of scale is a complex assessment and might require a much deeper analysis that takes into account annual plastic output of recycling facilities, broken by plastic type vis-a-vis expenditures, revenues, to arrive at the cash flow and the year at which they break even and see if that can be traced back to a particular level of output. This could serve as a threshold beyond which the unit cost starts to reduce, that could potentially help set the scale, by taking into account every possible parameter affecting the profitability/output of a plant. From our experience of working with MRFs, we know that such data could vary again between a manual and semi-automated and fully automated MRF and the types of materials they process, and without a detailed analysis that takes into account a representative sample of different types of MRFs, such an analysis cannot be comprehensive. We looked at a report by WRAP UK that corroborates this very understanding and in summary outlines that a Plastic Recovery Facility in the UK processing mixed plastics and operating at a throughput of 80,000 <p>tonnes/year is able to generate return on investment. A fully integrated Plastics Recycling Facility processing films, food grade clear PET and natural HDPE and industrial grade PE, coloured PET, PS and PP is commercially viable at a scale of 100,000 tonnes/year (and this is data from only one specific region having studied a sample of MRFs). Given these challenges, our proposal is to either dedicate deeper research on the issue of scale that address the challenges outlined above, or only rely on positive list followed by investment analysis. We acknowledge the good intention behind introducing the concept of scale, however, we are concerned that the current approach may not be setting a threshold taking into account all the parameters outlined above, and therefore may not be globally applicable.</p>	<p>Your comment on the project threshold is noted. Step 7.2 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised based on feedback received during this public consultation and no longer includes a threshold based on project scale. Due to a lack of adequate globally applicable data to determine a robust threshold, the project scale has been removed. The categories within the positive list have been revised to include project activities in conditions where confidence in additionality was determined to be high, .e.g. projects in certain types of locations and managing certain types of plastic waste.</p>

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28	Industry	Additionality	7.2	Positive List Matrix	<p>1. If our understanding is correct, then the matrix is meant to determine auto additionality for plastics for recycling. We are not clear how and why the cleanup category fits in the matrix. Could you please elaborate further on the definition of clean-up? Are we assuming that all that is "cleaned up" is by default ending up for recycling, because else it seems that it should be part of the Collection methodology?</p> <p>2. Please provide a rationale behind introducing further categorization (rigid, rigid mono-material and flexible mono-material) and using this categorization in determining positive list? "Positivity" of a material type or project type is highly region and context dependent (further detail in point 3 below)</p> <p>3. It is also not clear whether regional contexts have been taken into account while including specific plastic categories in the positive list. It would be helpful to support the arguments with live examples. Eg the world bank report states that Ghana has a lower middle income status. The positive list states that PET is not in positive list for such countries, while from our work in Ghana as well through our reading of publicly available data, we know that less than 2% of PET is recycled in the country. Also to be noted the stark contrast in treatment of PET in two lower middle income countries, i.e. Ghana and India. While in Ghana less than 2% PET is recycled, in India between 60-90% of PET is recycled and therefore, we are not certain if singling out PET in the positive list is the correct approach.</p> <p>4. PET does not have a very high recycling rate across the world as opposed to the perception. This report published by Eunomia clearly outlines that PET is the 4th highest recycled plastic in Kenya after HDPE, LDPE and PP. Similarly, in US only a little over 29% of PET bottles in circulation are collected for recycling, while, a quarter of that is exported to other countries like China to get recycled.</p>	<p>1. The 'clean up' category referred to activities that source plastic waste for recycling through clean up activities. The positive list has been revised and no longer includes this category.</p> <p>2. The additional categorization was included as a means to determine the relative value and additionality of the plastic without the need for a detailed financial assessment. This positive list has been revised based on feedback received in the public consultation. The positive list in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> allows for projects in specific regions that are managing specific plastic types to be deemed additional through the positive list.</p> <p>3 and 4. All positive list options have been revised to be enable assessment specific to project type (based on the material type managed) and regional context.</p>
29	Industry	Additionality	7.3	Determination of penetration rate	<p>1. Is the penetration rate to be determined for the project activity material type "I" (as suggested in the decision tree) or for all material types recycled in the region (as suggested in section 7.3)?</p> <p>2. Kindly provide the rationale for suggesting automatic additionality based on penetration rate below 10%?</p>	<p>Section 7.3 requires assessment of all material types managed in the project activity as has been noted. The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised to adopt a 20% threshold based on the common practice threshold in the <i>CDM Methodological Tool: Common Practice</i>.</p>
30	Industry	Additionality	7.3	Use of default values	<p>The PEW report takes data from World Bank's "What a Waste" report and it is acknowledged in the report that there are myriad data gaps and lack of recycling data for several regions as well as lack of data by material type. In light of this, we are not certain that use of default values might be accurate.</p>	<p>The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> provides an expanded footnote acknowledging the lack of available data and implications for data accuracy based on the note included in the public consultation. Project proponents are encouraged to use primary data when available. The methodology provides default factors for cases when primary data is not available or unrealistic for projects (e.g. small-scale projects). Guidance is now included to outline the conditions under which the default factors can be applied.</p>

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31	Industry	Additionality	7.3	Penetration rate	"The project proponent shall assess the penetration rate of the project activity in the relevant geographical region. The penetration rate (percent) is given as the ratio between the total installed recycling capacity in the geographical region (tonnes/yr) and the plastic waste production (tonnes/yr). If this penetration rate is below 10 percent, the project activity including all material types recycled is additional"- We are not sure of the purpose of building this provision. We understand that this will result in double counting, as country level data may have already accounted for it.	The assessment of penetration rate is provided to assess the proportion of waste recycled. This does not relate to specific technologies, but rather to recycling in general. Please refer to the response to comment #29
32	Industry	Additionality	7.3.3	Exclusion of project activities undergoing validation	Kindly provide a justification for excluding project activities undergoing validation or that are already registered from PR calculation.	This step follows common practice analysis from the Clean Development Mechanism (CDM). The calculation of total installed recycling capacity to determine the penetration rate of recycling activities would only take into account projects that are implemented without additional revenues from credits to confirm that this type of activity is not widely observed, and thus present different barriers or financial hurdles. This would mean that projects undergoing validation should also not be included in this analysis.
33	Industry	Additionality	7.3.4	Definition of Overall Penetration Rate	Kindly specify the meaning of "overall penetration rate". Also kindly provide explanation on how the penetration rate of a material type "i" may be greater than overall penetration rate (if it is implied that overall penetration rate is "PR" as per 7.3.5)	<p>This section has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> to clarify that the overall penetration rate is the average penetration rate of all the material types managed in the project activity. The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> includes further clarification on this.</p> <p>The penetration rate of a particular material type may be higher than the average penetration rate when the level of recycling of that material type in the relevant region is higher than the average penetration rate of all the material types managed in the project activity. This may occur in the scenario that one material type has a significantly higher market value than the others included in the assessment.</p>
34	Industry	Additionality	7.4	Step a: Challenges with comparing recycled plastic with virgin plastic	<p>1. We believe it may not be reasonable to compare unit price of recycled plastic with virgin plastic, because the economics and operations associated with a recycling facility cannot be compared with a virgin plastic production facility (which is a petroleum refinery and operates on a massive scale). Our understanding is that any investment comparison (including unit cost) can only be done between the options that are accessible and available to the project proponent.</p> <p>2. We should only use the price of virgin plastic as a market barrier to the entry of recycled plastic. The methodology proposes that if the price of recycled plastic is more than virgin plastic, such project will be additional. To be noted that if this were the case, then considering that price of recycled plastic have trended below virgin plastic for last decade or so, would suffice to say that a project that was hypothetically executed during this time would not be additional, using this argument. We therefore believe that the price comparison should be with the price of recycled plastic by other entities in the same region as opposed to virgin plastic.</p>	Virgin plastic was used for the unit price comparison as the primary competitor to recycled plastic. Section 7 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised and no longer includes this step.

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35	Industry	Additionality	7.4.7	Benchmark Analysis with building out an alternative scenario with PET	<p>1. Further to the comment above on the Positive List Matrix and differentiating PET from other plastic types, with the assumption that PET is the most profitable and most recycled material in all regions considered. While the approach of an alternative scenario using a profitable material in the region is sensible, it is highly likely that another resin type is more profitable in the region as opposed to PET (as explained in the example before) and therefore singling out PET with this understanding may not be the most feasible approach.</p> <p>2. Would be helpful to explain this with an example: facility capacity (all materials): 1000 t/year All plastic types: 500 t/year and PET: 100t/year - Scenario 1 and 2 seem to be giving the same output. For eg- if we are assuming that PET is a more profitable material than other plastic types, then shouldn't the financial analysis be considered for 100% of plastic recycled by the facility as PET? Going by the example above, shouldn't the financial analysis be conducted for 500 tonnes as opposed to 100 tonnes?</p> <p>3. Is 7.4.7 considering facilities that recycle other dry waste too (in addition to plastic waste) or excluding them and considering only the ones that recycle plastic exclusively? In that case, would it not make sense to include the entire facility and all material types in the analysis?</p> <p>4. It seems we are required to conduct both benchmark and investment comparison analysis for the chosen alternatives. If the IRR of the project activity wrt a particular material does not exceed the benchmark, then the project activity is additional. In that case, kindly provide a justification for further comparing it with IRR of any other material (PET in this case)?</p>	Please refer to the response to comment #34.
39	Service Provider	Additionality	7	Again, the methodology should consider taking into account the quality of existing recycling in the country while determining additionality. In the absence of that we see the potential for abuse/misuse of the Plastics Standards by low quality recyclers/downcyclers - that create more low quality, contaminated, and landfill bound plastics in the long run. It is our belief that recycling should only be done in a scientific way, contributing to a circular economy, and avoid creating more sustainability challenges in the long run.		Your point is noted. Please review the response to comment #4. The environmental and social safeguard requirements in the <i>Plastic Standard, v1.0</i> will help ensure that projects do not have a negative impact on the environment or the project actors. The requirements in Section 4 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> will also help ensure that processes that lead to the direct contamination of the waste with toxic materials are not eligible to use this methodology. This section also provides the option for projects to demonstrate the quality of the recycled material as a way to distinguish themselves, however they are not required to do so.
40	Service Provider	Additionality	7.2	HDPE should not be equated to PET in LMI or LI countries because these countries do not have high recycling rates for HDPE the way as they do for PET. This is largely because of unavailability of consistent feedstock like the large format milk and juice packaging in US and EU.		Your point is noted. Please refer to the response to comment #28.
41	Service Provider	Additionality	7.3.5	Section 7.3.5 talks about an approach that considered Total installed capacity - does this consider the small informal recyclers? That type of unscientific recycling should not be considered as "capacity" because it is the very problem formal recyclers like us are attempting to address.		Section 7.3 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> requires that "all legally recognized recycling facilities in the region" be considered when determining total installed capacity. This does not include recyclers that are not legally recognized in some manner.

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46	Service Provider	Additionality	7.1	Lines 4-6: Text is unclear and needs some additional punctuation or broken up into 2 or more sentences. In particular the last part of the sentence that states "without being registered as a project activity under the Plastic Program". It seems like it could create a circular, contradictory requirement that the project must include a new recycling activity or expansion without being registered under the Plastic Program, in which case another new addition or activity must be added?		The wording in Step 7.1 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised for clarification of this point.
47	Service Provider	Additionality	7.1	8 through 12 on p 11, 1 - 5 on p 12: The 50% compliance rate will be very hard to get data on as collecting data on legal non-compliance does not exist in many developing countries and will be hard to obtain.		This step has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> , and no longer requires demonstration of compliance below 50%. Project proponents can demonstrate non-compliance with regulatory requirements if they consider this to be relevant to their project activity. Projects may also demonstrate that their project activity will exceed a specific mandatory threshold for recycling of a certain material type to demonstrate regulatory surplus.
48	Service Provider	Additionality	7.3	7-10 on p 15; 1-4 on p 16: Where does the 10% threshold come from? How is this calculated if the plastic is recovered in one region, and then trucked to another for recycling? E.g. we anticipate moving plastic waste between cities that are several hours drive apart as there is no recycling capacity at all in the collection city.		Please refer to the response to comment #29 This step requires project proponents to identify and include the relevant 'collection area' (defined in <i>Plastic Program Definitions, v1.0</i>) in this assessment (i.e. the source of the plastic waste). The penetration rate will be determined for the collection area of the project activity. For projects that are importing plastic waste in accordance with Section 4 of the methodology, the penetration rate will be calculated for the country that the recycling activity is taking place in.

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50	Industry	Additionality	7.2	<p>The Draft Methodologies do not address "Remote Projects". Remote Projects are similar to "Rural Projects" in that they have low population density, i.e. are small. However Remote Projects need to be distinguished from Rural Projects in that they are a significant distance from urban areas, and or separated by sea (i.e. islands), and or are coastal projects where significant plastic waste from other territories washes ashore.</p> <p>We therefore propose a new project category for the Recycling Methodology which is "Remote Project".</p> <p>Please see full responses and reasoning for this proposal in the "Other general feedback" section of the "RM Comments by Section" tab (note this is the same as that under "Other general feedback" in the "CM Comments by Section" tab)</p> <p>We also propose that the capacity threshold be increased to 250 tonnes per year. This threshold may approximate the plastic waste generated by a small community with a population in the range of 5,000-10,000 people:</p> <ul style="list-style-type: none"> - the average person produces 50 kg plastic waste per year - 5,000 people will produce 250 tonnes - assume 50% is collected, 10,000 people would produce 250 tonnes - 150 tonnes would likely be associated with a smaller community (e.g. of a few thousand people) and therefore may be too low of a threshold" 		The positive list has been revised to include categorizations that are considered to be applicable under a broader set of circumstances, which would address the project types mentioned in the comment. These categorizations take the location and nature of material being managed by the project into consideration. Please refer to the response to comment #27.
54	NGO	Additionality	7.2	see CM comments		Please see response to comment #40 on the <i>Plastic Waste Collection Methodology</i> .
58	NGO	Additionality	7.2	We therefore propose a new project category for the Recycling Methodology which is "Remote Project".	the definition of rural (less than 400 inhabitants per sq km) - may cause Les village to be defined as urban. Indonesia falls into the World Bank UMI category (where urban communities do not qualify for credits), so it is important that we fall into the rural category. Excluding PET and HDPE will significantly dent our financial viability.	The definition of rural has been revised to "an administrative unit with population density of less than 300 inhabitants per square kilometre" in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> . The positive list has been updated based on feedback received in this public consultation to include project activities in a context where confidence of additionality was determined to be high (i.e., projects located in certain areas and managing specific types of plastic waste).
59	NGO	Additionality	7.3	Is the penetration rate really relevant where the recycling activity comprises low technology menial labour sorting/trimming plastic waste and selling to the intermediary merchant? Other plastic aggregators may already be doing the same functions but at much lower wages. The "relevant geographical region" also needs to be defined, since much of Bali's existing plastic waste may be shipped by intermediaries for concentration and processing elsewhere in Indonesia.		<p>The assessment of penetration rate requires the assessment of the % of waste recycled in the region. This does not relate to specific technologies, but rather to recycling in general.</p> <p>Project proponents may choose to apply one or more of the steps included in Section 7 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> to demonstrate additionality.</p> <p>A definition of "region" is provided in the <i>Plastic Program Definitions, v1.0</i>.</p>

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60	NGO	Additionality	7.4	Please see full responses and reasoning for this proposal in the "Other general feedback" section of the "RM Comments by Section" tab (note this is the same as that under "Other general feedback" in the "CM Comments by Section" tab)	Non-compete is irrelevant where the remote community is recycling plastic at ethical standards and probably taking trimming and sorting work away from merchant intermediaries who pay much lower wages. Investment analysis can be a simple cash flow analysis of baseline scenario (where the local authority does not hire labour to process plastic) versus recycling scenario (where wages need to be paid to process plastic) and showing that the recycling scenario is cash flow negative compared to the baseline scenario without the plastic credits.	<p>The non-compete analysis has been moved from the additionality section (Section 7), and is now included as an applicability condition in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i>. Project proponents are required to demonstrate that recyclable plastic waste is available in the region and that the project activity does not displace an existing recycling activity as a pre-condition to ensure that the activity results in an increase in recycled plastic waste.</p> <p>The investment analysis in Section 7 serves to demonstrate that the project activity is not economically or financially attractive, where the project proponent is required to select a financial indicator of the project activity and demonstrate that the indicator is less favorable than a benchmark value. This is meant to serve the same purpose as the proposed cash flow analysis, while also taking market conditions into consideration.</p>
67	NGO	Additionality	7.1	Yes, EPR schemes should be included as part of the regulatory surplus assessment. No, the guidance provided is not sufficient to avoid confusion of how EPR schemes should be treated. EPR schemes need to directly contribute to the local REDUCED consumption of plastic and increased collection and recycling of plastic in LDCs, SIDS, SUZ, small, rural and coastal communities, and large cities worldwide. EPR schemes could directly benefit and recuperate some of their expenses and, or costs of implementing EPRs, through royalties from the profits derived from the sales revenues of value-added products in each LDC, SID, SUZ, small, rural and coastal communities, and large cities worldwide.		<p>The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> includes further guidance on how EPR schemes should be considered in Section 7.1 (Regulatory Surplus). Please refer to the response to comment #5.</p>
68	NGO	Additionality	7.2	No, the threshold and financial burden need to be relative to the size of the small-scale projects. Some remote communities may not meet the 150 tonnes per year, and yet, still be able to support micro recycling plants for their local benefit. These benefit may include and not limited to cost cutting, waste-transport emission elimination, open burning elimination, etc.		<p>The threshold of 150 tonnes per year for the classification of projects based on scale was included to enable projects with a recycling capacity below that threshold to demonstrate additionality using the positive list in Section 7. The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> no longer includes a project threshold. Please refer to the response to comment #27.</p>

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69	NGO	Additionality	7.2	<p>a. Yes, reasonable but incomplete or lacking.</p> <p>b. If there are only two plastic waste categories (recyclable and non-recyclable) then no, the categories in the positive list are not appropriate because the project can not obtain this information easily. There are compostable, biodegradable, bio-based plastics that are not listed in the categories and need to be taken into account.</p> <p>c. Data sources suggestions: oil, petrochemical, plastic producer, brands, EPR, converters and brokers. A customer-centric data aggregator to Track, Trace, Collect & Optimize the value of Plastic Waste from cradle-to-cradle. It will give people and industry detailed information about fossil and bio-based derived plastic packaging. This source of data can be a relevant entity outside the recycling facility that can be a project developer directly financed by the Plastic Program.</p>		<p>a. The positive list has been revised based on feedback received in the public consultation. Please refer to the response to comment #28.</p> <p>b. Compostable, biodegradable and bio-based plastic are included in the scope of the Plastic Program under "Other Plastics" in Section 2.1.1 of the <i>Plastic Standard, v1.0</i>. As long as the project is processing materials that are eligible under the scope of the Plastic Program, they will be eligible to use this methodology and to demonstrate additionality by applying Section 7 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i>.</p> <p>c. Your suggestions on potential sources of data are noted. For the quantification of plastic waste recycled as a result of the recycling of composite materials, further proof is required to determine the plastic fraction in the composite materials recycled by the project activity. This requirement has been revised to either allow a default adjustment factor of the plastic fraction to be used or to require sampling of the plastic waste fraction. The default adjustment factors may be updated in future revisions of the methodology if new data sources are accessed. As suggested in the comment, project proponents may use data from sources outside the recycling facility as long as this meets the requirements for sampling in Section 8 in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i>.</p>
70	NGO	Additionality	7.3	Not able to comment		Noted, thank you.
71	NGO	Additionality	7.4	No. The unit price against the price of virgin plastic does not account for the cost of environmental damage caused by plastic waste for the same material type. There are types of materials that are more damaging than others when they leak into the environment.		The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> no longer includes this assessment. Please refer to the response to comment #34.
72	NGO	Additionality	7.4	No. Either offer a third option for investment analysis based on a monetary amount for a plastic waste deposit for refund based in the country or relevant region. Or, include a Government plastic waste deposit for refund on all plastic packaging, products and items in the Benchmarks options.		<p>Section 7.4 was included to demonstrate that the project is not financially attractive. In the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i>, this can be demonstrated through an investment analysis.</p> <p>It is outside of the scope of this additionality test to consider the costs of a deposit-return-scheme and alternative activities.</p>
73	NGO	Additionality	7	Question 11: Yes, reasonable but incomplete. We need to expand real-time data collection to and from the public. Data exchange to and from the public, MRFs, Brands, plastic producers, plastic recyclers and petrochemical producers will be extremely beneficial to the entire plastic value chain. And to ensure that only what it is needed is produced to reduce waste plastic from the source.		While the Plastic Program does not currently intend to directly support the development of a database, the project descriptions of all projects that are registered under the Program will be uploaded and be publicly accessible on the Verra registry (on the Verra website). Sufficient data must be provided in the project description for others to recreate the quantification of baseline and project recycling. This will be one way to ensure that data from different types of plastic waste management projects is publicly shared.
75	Service Provider	Additionality	7.3	Question 8: We believe the opportunity shall be left to project developers to submit data enabling calculation for specific material types. The relevance of such data should then be left for review by the independent verifier.		This step has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> to provide more guidance on the sources of data that can be applied. This step should be applied at the project activity level to include an assessment of all material types within the project activity.
76	Service Provider	Additionality	7.4	Question 9: We propose instead to compare the cost of recycling with the low point of virgin plastic over the three-year period immediately prior to the time of decision making of the project activity.		The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised based on feedback received in this public consultation and no longer includes this section.

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Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
77	Service Provider	Additionality	7.3	The penetration threshold of 10% seems too low. Southeast Asia is a major contributor to land-based plastic waste leaking into the world's oceans with more than half of it coming from four nations - Indonesia, the Philippines, Vietnam and Thailand (not mentioning China). Nonetheless, reported recycling rate in the region are way above 10% (Indonesia 10%) / Vietnam 27% / Thailand 25%).	Adopt a threshold in between 10% and 25%	Please refer to the response to comment #29.
78	Service Provider	Additionality	7.3.3	The current methodology approach to determine the penetration rate is based on penetration rate for all material types. We believe in some cases the penetration rate can be realistically estimated specifically for a material type recycled at the project facility. This can be the case for plastic films for instance where there is a direct / strong correlation between plastic film production and plastic waste generation	Amend section 7.3 to project developers to submit data enabling calculation for specific material types. The relevance of such data should then be left for review by the independent verifier. Not to provide such an opportunity is to some extent inconsistent with section 7,3,4 where project developers are required to calculate the penetration of a specific material type when it can anticipated that the penetration rate for the material type is higher than the overall penetration rate.	Please refer to the response to comment #75.
79	Service Provider	Additionality	7.3.3	Installed recycling capacity shall not be considered if they are not operational. It is possible that some capacity added to the market are never operational with their function shifted from their initial inted due to business motives. Also second hand facilities can be purchased / installed by ultimately operated blow their design capacity.	Replace "installed recycling capacity" by operational installed capacity"	Please refer to the response to comment #26.
80	Service Provider	Additionality	7.3.3	Share of imported material should not be factored in the calculation of the penetration rate	The share of processed material imported should also be excluded from the total operational recycling facility.	The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> will only permit the import of plastic waste for recycling under the conditions outlined in Section 4. The relevant region in Step 7.3 for the calculation of the penetration rate for such projects will be the country that the recycling activity is taking place in.
81	Service Provider	Additionality	7.3.4	same as above	Amend section 7.4 to project developers to submit data enabling calculation for specific material types even if the anticipated penetration rate for the material type is lower than the overall penetration rate. The relevance of such data should then be left for review by the independent verifier.	The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised and no longer includes this step. The revised additionality sections in the methodology will require assessment at the project activity level, including all material types recycled in the project activity that meet the regulatory surplus requirements in Section 7.1 (Step 1).
82	Service Provider	Additionality	7.4	The average price of virgin plastic material over the three-year period immediately prior to the time of decision making of the project activity is unfortunately not a reliable indicator of the future market price. However, the variability in this price is an indicator of the financial vulnerability of the recycling active	Instead, we propose to compare the cost of recycling with the low point of virgin plastic over the three-year period immediately prior to the time of decision making of the project activity.	Please see the response to comment #76.
83	Service Provider	Additionality	7.4	The cost of recycling is not a defined term within the methodology itself. It is unclear whether the cost of recycling is inclusive of the cost to purchase of raw materials (this can represent up to 50% of the recycling cost) or reasonable profit	Addition of a definition for ""plastic recycling cost"" including also purchase of raw material and reasonable profit.	The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised to include examples of costs that can be covered in the investment analysis. This includes the cost of purchasing plastic waste for recycling.
88	Industry	Additionality	7	We note simply that the structure of this Section 7 is slightly different (and more detailed in certain cases) than its cousin section in the Plastic Waste Collection Methodology. For example, in this methodology there are boxes at the end of each sub-section within Section 7 that illustrate the outcome of that sub-section, while the Plastic Waste Collection Methodology does not.	It would be ideal if this methodology and the Plastic Waste Collection Methodology could be made as consistent as possible to avoid any confusion in terms of application, particularly where projects are using both methodologies at once.	The additionality sections in both methodologies have been revised as relevant to ensure consistency in the format of both documents.

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Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
95	Other	Additionality	7.1	Question 5: EPR schemes should be included as part of the regulatory surplus assessment if they are required by law. We understand that this is what is being proposed in Section 7.1.		Yes, Section 7.1 is proposing that EPR schemes should only be included as part of the regulatory surplus requirement if they are required by law.
96	Other	Additionality	7.2	Question 7: a. The idea here seems to be to exclude easily recyclable materials to guarantee additionality. This makes sense; PET and HDPE are most commonly recycled. b. These broad plastic categories make sense and this information should be easily obtainable in a project.		Your point is noted and is an accurate understanding of this requirement. The positive list will be revised to include projects in low income countries, projects in rural areas in lower-middle income countries and projects managing mono-material flexible materials and composite materials in lower-middle income countries. The premise of this section however will remain the same, to exclude easily recyclable materials from the positive list.
97	Other	Additionality	7.3	Question 8: The approach based on penetration rate for all material types makes sense; otherwise the complexity of the methodology increases too much. The Breaking the Plastic Wave Report is a good source for determining plastic waste generation rates.		Your support of the determination of the penetration rate for all material types and for the reference to the Breaking the Plastic Wave Report is noted.
98	Other	Additionality	7.4	Question 9: Does the concept of levelized cost of recycling <i>per material type</i> make sense? I understand levelized cost to be calculated as $\frac{\text{Total Discounted Cost}}{\text{Total Output}}$. How do determine cost per material? Generally speaking, comparing the unit price with virgin prices seems sensible.		Please see the response to comment #76.
99	Other	Additionality	7.4	Question 10: Yes		This section has been removed in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> .
100	Other	Additionality	7	Question 11: Yes, the overall approach seems reasonable.		This section has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> . The criteria for projects to be deemed automatically additional based on the positive list has been revised and the investment analysis has been revised to only include the benchmark analysis.
62	NGO	Additionality	0	Indonesia is UMI. Les village has a population of 7,830. Even assuming a site area of 10 sq km (Les is likely closer to 5 sq km), the density of Les will be 783 per sq km, thereby not falling within the rural categorisation. Hence UMI/non-rural, Les will not qualify for the positive list, which surely cannot be intended. Rural communities in Asia tend to have a density far different from rural communities in the west. They are identified by a smaller geographical boundary than urban centres, but because of large extended families living in communal quarters in close proximity to each other, the density can be more than 400 per sq km.		Please see the response to comment #58.
2	Other	Applicability Conditions	4.1.1	You have already cited paying price premiums to collectors and establishing collection points at landfills as good incentives. These can be best financed by a combination of use fees and EPR.		This section has been revised so that collection projects that enable increased recycling will be able to issue Waste Recycling Credits given that they apply the methodology as a joint project with the mechanical recycler and include the recycling facility in the project boundary.
3	Other	Applicability Conditions	4.2.1	The approach to transboundary movement is appropriate.		This section has been revised so that a project may also import plastic waste if there is insufficient plastic waste available in the exporting country to enable the development of recycling infrastructure at the time of project validation.

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4	Other	Applicability Conditions	4.2.3	The use of material in roads is a second life, with relatively small amounts of leakage.	Delete the sentence: "This includes the use of plastic waste material for the purpose of road construction as this does not allow for a second life of the recycled plastic material and the other materials used."	Section 4 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised to clarify the applicability conditions for the outputs of recycling project activities and encourage the highest possible level of recycling for all plastic waste within project activities. Credible evidence shall be provided to demonstrate that recycled material will be used for manufacturing of recycled products, thereby displacing virgin plastic. An exception is provided for the recycling of composite materials, where it can be demonstrated that separation by polymer type is not possible and that the manufactured products are designed to be durable (i.e., lifetime > 10 years) to avoid rapid downcycling.
15	Service Provider	Applicability Conditions	4.1	Second Life/End-Products	Under 4.1.2 and 4.1.3(6) below, if you manufacture plastic waste into a new end-product and/or recycled plastic has a second life, does it matter what useful life of the new product is? Can it be a single-use plastic product where the same plastic will be in the waste stream again in a short period of time?	Please review the response to comment #4
20	Industry	Applicability Conditions	4.1.1(4)	Inclusion of "Incentivizing and/or facilitating an increase in the collection of plastic waste" under the Recycling Methodology	Page 6 line 29: "Incentivizing and/or facilitating an increase in the collection of plastic waste (e.g., paying price premiums to collectors, establishing collection points at landfills)"- kindly specify why this has been included under applicability. We believe this should be a part of additionality, as our understanding is that whichever entity is in a position to demonstrate additionality for collection and/or recycling, should claim relevant credits (i.e. WCC and/or WRC respectively).	Please review the response to comment #2. With this revision, plastic waste collection projects that incentivize recycling will have to apply the methodology with the recycling facility and demonstrate additionality of recycling to be able to issue Waste Recycling Credits. This is included as an applicability condition to list out the conditions that such projects will have to meet.
21	Industry	Applicability Conditions	4.1.5	Proof of materials supplied	Page 7 line 17: Our proposal is that proof of materials supplied from the mechanical recycling facility that will be used for processing or manufacturing of plastic products should be actual receipts. Only contracts or third party survey results may not suffice as proofs of actual transaction.	This section has been revised to explicitly state that credible evidence shall be provided from a source that can be verified by the project auditor.
22	Industry	Applicability Conditions	4.2.1(1)	Establishing audit trail for materials exported from an LDC	Page 8, line 12: For LDCs, it may not always be possible to establish an audit trail of materials to their end destination (eg an LDC exporting waste to another country for recycling through aggregators). In this case, invoice from licensed aggregators or letter of intent from the end manufacturer shall suffice. In such a case, it may be proposed that supply chain entities such as the aggregators, final manufacturers, etc should be licensed to be able to establish credibility of claims	Your point is noted. However, this requirement serves to establish an audit trail from the source of the plastic waste until the end destination of the project activity. The project is required to establish an audit trail of the material from the source of the project activity until the end destination of the project activity anyway. The requirement here is to ensure that a project activity that is importing plastic waste is able to demonstrate the source that the plastic waste is imported from. The project is not required to establish an audit trail for the plastic waste beyond the end destination of the project activity.

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Comment #	Commenter Organization Type	Topic	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
23	Industry	Applicability Conditions	4.2.3	Treatment of materials with high risk of leaking and projects that do not allow for subsequent life of material	<p>Page 9, lines 5-10:</p> <p>1. this criteria speaks of exclusion of two project types as per our understanding, i.e. materials with high risk of leaking and second that do not allow for subsequent life of material. Rationale shall be provided for excluding materials under the latter category, i.e. that would/can not be recycled subsequently.</p> <p>2. It may be explicitly outlined in the methodology how the "high risk of material leaking into the environment" is expected to be measured (audit or peer reviewed, scientific journals). For eg. there are peer reviewed journals that corroborate through scientific evidence that there is no risk of plastic waste material leaking from road construction projects"</p>	Please refer to response to comment #4.
23.1	Service Provider	Applicability Conditions	4.2.3		The exclusion of high-risk application in terms of leakage potential or subsequent life of material is eligible but a guidance document with a specified list of examples would be helpful indeed.	Please refer to the response to comment #4.
37	Service Provider	Applicability Conditions	4.1.3	In section 4.1.3 - please consider diversion from "down-cycling" as one of the conditions because in India, for example, while you will read that 60-70% of all waste plastics are recycled. You will also find strong evidence that suggests that most of it is recycled in unscientific ways that leads to contaminated and down cycled product that cannot be further recycled, and was found to have lead, arsenic, phthalates and other carcinogens and endocrine inhibitors as contaminants.		<p>Your point is noted. However, this methodology cannot allow for the diversion of plastic waste from existing activities unless the project can demonstrate that the waste is being managed in one of the ways included in Section 4 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i>. While the Plastic Program does not support the inclusion of toxic materials in recycling, the Program cannot allow downcycling processes to always qualify as a source of material for a recycling project since it is not possible to ensure that the source process would lead to short-term environmental/human harm.</p> <p>The market will drive finance towards recycling processes that are producing high quality recycled material, increasing the incentive for recycling processes to improve their performance. Since improper recycling processes are likely to lead to materials ending up in one of the options mentioned in Section 4 anyway, downcycling processes or their end products are likely to be eligible as a source without any revision to this section.</p>
38	Service Provider	Applicability Conditions	4.1	The methodology should consider making a distinction between PCR / Industrial sources because it is exponentially more difficult to recycle PCR plastics		Your point is noted. However, this methodology will not assign different values to plastic material types, applications or sources at this stage to encourage recycling of plastic waste from all sources. The specific context for each project will be described by the project proponent in the determination of the baseline and demonstration of additionality. Information about the material type and sources will be available to credit buyers through the project description and monitoring report(s) available on the Verra registry.
42	Industry	Applicability Conditions	4.1.1	Q2 - The best way to incentivise an increase in collection is to educate communities on the value of the plastic resources, and to stop calling it waste. It is only waste when the value is not apparent.	4.1.1. #5. Capacity-building educational training in resource recovery	The Plastic Program will not prescribe educational training in resource recovery as a requirement at the moment to avoid being burdensome on projects that do not have the resources to undertake educational training in the short term. However, the Plastic Program recognizes the importance of educational training in resource recovery and hopes that the incentive and availability of credit finance will drive more projects to engage in plastic waste collection.
43	Service Provider	Applicability Conditions	4.1.1	Question 2: These activities can be incentivized if they are able to generate their own collection credits.		Please review the response to comment #2 for a summary of how collection projects that enable mechanical recycling can use this methodology.

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44	Service Provider	Applicability Conditions	4.2.3	<p>Question 4: Text seems to be overly restrictive and a deterrent to recycling. If there is a desire to avoid e.g. recycling material to produce single use plastic bags that seems reasonable, but the definition of "high-risk" of leaking into the environment should be replaced with a negative list of recycled end-projects. These should be prohibited unless the project proponent can demonstrate that they are not a high-risk of leaking into the environment. Similarly the requirement that end products can not be "harder to mechanically recycle as a result of their application" seems quite restrictive. It could also be helpful to give an example of what types of recycled plastic products could be considered OK. Based on the current text every product that could be recycled could be excluded, making it impossible to apply the methodology anywhere."</p>		Please refer to the response to comment #4.
45	Service Provider	Applicability Conditions	4.2.3	<p>Lines 5-8: The text as written is too restrictive and risks making the meth inapplicable. That said, the meth should clarify that the recycling facilities should have systems in place to ensure that plastic does not enter the environment during the recycling process itself.</p>		Please refer to the response to comment #4.
53	NGO	Applicability Conditions	4.1.1	<p>Question 2: The recycling and collection functions are usually performed by the same local organisation. Recycling credits received by the same organisation will incentivise the collection of plastic waste.</p>		Please review the response to comment #2 to see how collection projects that enable recycling can issue Waste Recycling Credits.
55	NGO	Applicability Conditions	4.1.5	<p>Credible evidence to show that the materials will be used for processing or manufacturing of plastic products, thereby replacing the use of virgin plastic material.</p>	<p>Sale to merchants dealing in plastic waste should be self-evident that the plastic will be recycled into new products. Delete the need to show that this displaces the use of virgin plastic.</p>	Please refer to the response to comment #4. Section 4 in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> requires the project proponent to provide evidence, such as contractual agreements, receipts of sale or third party surveys, that the recycled material will be used to manufacture recycled products. This requirement is included to provide an additional safeguard that the recycled material will be used to displace virgin material, and not for another purpose.
56	NGO	Applicability Conditions	4.1.1, 4.1.2	<p>Activities qualifying for credits</p>	<p>Selling sorted/trimmed waste to intermediaries should be included in 4.1.1. Sorting plastic waste types should qualify as "material concentration of waste".</p>	<p>Given that Waste Recycling Credits can only be issued on plastic waste that has been processed/recycled, the sale of sorted/trimmed waste to intermediaries cannot be considered a project activity that directly results in recycled plastic. This section in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> is to list out the activities that can generate recycled plastic as an end product that Waste Recycling Credits can be issued on.</p>

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64	NGO	Applicability Conditions	4.1.1	Question 2: Can the relevant entities outside the recycling facility be project proponent/developers themselves and apply directly to the Plastic Program? This way the Plastic Program will incentivize the flow of finance directly to those relevant entities.		Yes, collection actors will be eligible to issue Waste Collection Credits if they meet the requirements of the <i>Plastic Standard</i> and the <i>Plastic Waste Collection Methodology v1.0</i> . Should collection actors outside the recycling facility be interested in developing a project and issuing Waste Recycling Credits, they may set up as a waste collection project that collects material from the environment and supplies it to a waste recycling project. They would have to meet the requirements for collection projects that enable recycling, i.e., including the recycler in the project boundary and applying the methodology as a joint project with the mechanical recycler, per Section 4 in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> .
65	NGO	Applicability Conditions	4.2.1	Question 3: a. No, excluding transboundary movement of plastic waste from LDCs or SIDS and export to other countries (LDCs, SIDS or otherwise) for further processing, is not appropriate. b. No, there should be no import of semi-processed waste by any country. Each region needs to be able to implement the Proximity Principle and benefit from generating employment from recycling plastic waste locally in LDCs, SIDS, SUZ, small, rural and coastal communities, or otherwise worldwide. These regions need to benefit from the sale of recycled, upcycled or otherwise transformed value-added products from waste plastic in plants that provide jobs at walking distance to the community in which they operate.		Your point is noted. However the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> will continue to include these applicability conditions to support the short-term development of recycling infrastructure and increase recycling rates. These conditions may be reviewed and revised in future iterations of the methodology to increase restrictions on the import of materials.
66	NGO	Applicability Conditions	4.2.3	Question 4 a. No. b. Yes. For example, the 2020 oil spill in by Wakashio, it's Japanese insurer, Japan P&I Club and the Government of Mauritius, Plastic-to-Fuel need to be explicitly excluded from this methodology. c. Yes.		Please refer to the response to comment #4.
86	Industry	Applicability Conditions	4.1.1	The phrasing of this sentence is awkward in the context of the preceding statement.	Rewrite as "Project activities MUST result in recycled plastic waste through...". Overall, it would be useful to ensure that these lead-ins to each of the applicability conditions use consistent syntax.	We text has been revised for clarity.
87	Industry	Applicability Conditions	4.1.1(4)	It is a bit unclear why activities that incentivize an increase in collection of plastic waste would not be more appropriate under the <i>Plastic Waste Collection Methodology</i> . We note this is also mentioned in Section 2, page 3, line 5.	Please clarify why activities that incentivize increased collection are categorized as being most applicable under this <i>Plastic Waste Recycling Methodology</i> rather than the <i>Plastic Waste Collection Methodology</i> .	Project activities that enable an increase in recycling as a result of collection or sorting activities are encouraged to apply the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> in cooperation with the mechanical recycler per Section 4. Project activities that lead to an increase in plastic waste collected from the environment shall apply the <i>Plastic Waste Collection Methodology, v1.0</i> .
93	Other	Applicability Conditions	4.2.1	Question 3a: This approach seems reasonable, provided that you want to discourage the export of waste from developed and developing nations and encourage the development of a local waste management industry in these countries instead. However, you may want to consider that the import of high-quality plastics may actually enable the development of a local waste management/ recycling infrastructure in the importing country.		Your point is noted. This applicability condition has been revised in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> so that a project can only import plastic waste if they can demonstrate that there was insufficient plastic waste available in the exporting country to enable development of recycling infrastructure at the time of project validation. The purpose of this condition is to limit the export of plastic waste to the extent possible, especially in the case that the exporting country has the resources to manage the plastic waste and the importing country doesn't need to develop infrastructure to manage plastic waste that is generated elsewhere.

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94	Other	Applicability Conditions	4.2.3	<p>Question 4:</p> <p>a. The exclusion is very broad and potentially includes a wide range of applications. It may be worth developing a negative list of applications that would be excluded, although this comes with certain difficulties on their own (see below).</p> <p>b. It may not be feasible to explicitly exclude a wide range of specific applications since projects concerned with material concentration of plastic waste or processing of plastic waste into recycled material often have very limited control over the use of their products.</p> <p>c. Yes. Guidance on how to determine high-risks application would be helpful for participating companies.</p>		Please refer to the response to comment #4.
7	NGO	Baseline Scenario	6	Based on the methodology and the Plastic Standard, it is not clear how Section 3.4 - Plastic Waste Recovery and/or Recycling Baseline Scenario of the PD Template v0.2 should be completed		Language in the final project description (PD) template has been revised to provide clearer instructions on how the section should be addressed based on the methodology. It includes clear steps to describe the baseline scenario in accordance with the methodology and mention any assumptions and sources of information used in this description.
57	NGO	Baseline Scenario	6	Baseline scenario of plastic waste that would remain in the environment without the plastic waste recycling activity: we cannot separate recycling baseline from collection baseline.	Where the project is receiving both collection and recycling credits, the same baseline scenario should be used. Because the plastic waste would not be collected without being recycled anyway. The only plastic that ends up in landfill is that which is not recyclable.	Whether the project will have the same baseline scenario for both activities depends on the location, start date and other factors that might influence what is considered to be the baseline scenario for the respective activities. If the plastic waste was not being managed at all prior to the project, the projects can mention this in their project description. Since the determination of the baseline scenario would be fairly subjective in this case, we would like to avoid being too prescriptive regarding the determination of the baseline scenario for a project with both a collection and a recycling activity.
1	Other	Definitions	3	Managed landfill: Yes, the definition of managed landfill according to the ISO standard is appropriate and all conditions should be met.		Given that a recycling project is not required to demonstrate whether material is sourced from a managed or an unmanaged landfill, the definition of "managed landfill" has been deleted from this methodology. The definition of "landfill" is included in the <i>Plastic Program Definitions, v1.0</i> .
19	Industry	Definitions	3	Collection area: Definition of "Collection Area"	Pg 3, Line 25: Kindly clarify how the "collection area" is different from "region" and the significance of including imported waste in the definition of Collection Area.	The definition of collection area pertains to the area from which the plastic waste has been sourced. It is defined in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> . The term "region" has a broader definition and may refer to an area as small as the project boundary or as large as the country in which that the project activity is taking place. The definition of region will be included in the <i>Plastic Program Definitions, v1.0</i> . The methodology provides guidance on how each term shall be applied as required by the relevant sections.
63	NGO	Definitions	3	Managed landfill: Zero plastic waste to landfill needs to be a requirement included in the definition of "managed landfill".		<p>The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> currently allows the inclusion of a landfill as a source of plastic waste to ensure that plastic waste is collected and appropriately managed even in areas that lack other forms of waste management infrastructure. Due to this, "zero plastic waste to landfill" cannot be included in this methodology.</p> <p>Please note that since recycling projects are not required to demonstrate whether material is sourced from a managed or unmanaged landfill, the definition of "managed landfill" has been deleted from this methodology. The definition of "landfill" is included in the <i>Plastic Program Definitions, v1.0</i>.</p>
84	Industry	Definitions	3	Capacity addition: The final part of the definition for "capacity addition" seems incomplete (i.e., "modification of the process [for what?]...").	Complete the final part of this sentence.	The definition in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised to clarify that this refers to the modification of the recycling process.

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85	Industry	Definitions	3	Region: The definition for "region" is a bit odd. It seems to be driving at the establishment of a region that is relevant for certain elements of the project (e.g., additionality? baseline scenario? etc?), but that context isn't clear in the context of the definition itself.	Simplify the definition for "region" by removing the project-specific context and simply move that contextual information to the relevant section of the body of the methodology.	The definition of region has been revised to include preferably the source, project activity and end destination of the project; and at most the country that the project is located in. The revised definition of region will be provided in the <i>Plastic Program Definitions, v1.0</i> . The methodology provides guidance on how this definition shall be applied as required by the relevant sections. The establishment of the region is important to address requirements in the <i>Plastic Standard, v1.0</i> and in the methodology.
92	Other	Definitions	3	Managed landfill: The definition seems appropriate, although two more criteria could be added: - Has a groundwater monitoring protocol - Has post-closure care requirements While some criteria (e.g. sanitary lining) may be more relevant from an environmental viewpoint than others (e.g. access restrictions), we would argue that a landfill would have to meet all the requirements mentioned in order to be regarded as 'managed'.		Please refer to the response to comment #1.
12	NGO	Monitoring	9.1	%SB recyc: 1. For new projects- this is 0% (ex-ante) 2. For capacity additional projects - this is calculated in year basis (ex-post) - because you depend on monitoring the new capacity addition correct? Therefore this is already in section 5.2 on the PD correct?		Section 9 of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> has been revised so that the baseline recycled plastic is determined ex-ante at validation based on the amount of the relevant plastic waste types that the project recycled at baseline. The project proponent will no longer be required to determine the share of baseline recycled plastic since the absolute amount of baseline recycled plastic is already determined.
10	NGO	Quantification	8.1	Equations 1 & 3: Equations 1 & 3 use the same symbol- P recyc, y for different things. Eqn 1: P recyc,y should be the total amount of plastic waste recycled by the project activity - which for an additional capacity means: past capacity + additional capacity Eqn 3: P recyc,y should be the new recycling capacity addition, not the total amount of plastic waste recycling by the project activity as equation 1		The equations have been revised so that the baseline plastic recycled is determined based on the amount of each relevant type of plastic waste recycled by the project at baseline. The share of baseline recycled plastic waste no longer needs to be calculated since the amount of plastic waste recycled at baseline is already determined.
11	NGO	Quantification	8.1	Equation 2: I got completely lost here to be honest. 1. Are we not doubling the amount of Plastic produced by the facility? 2. If the recycling facility does not use the pellets for manufacturing, but it sells for a third-party, would we be penalizing these projects?		The equation was meant to represent the sum of the recycled material that is used in-house and material that leaves the facility, accounting for the total amount of recycled plastic waste generated. For simplicity of monitoring and calculation however, this equation has been revised to only account for the amount of each relevant plastic waste type recycled by the project activity, where the amount of recycled material is determined at the output of the recycling process.
13	NGO	Quantification	8.1.2	Equation 3: Once you need PBL y to calculate the SB recyc, do you also need to monitor the PBLy?		Please review the response to comment #10 to see how this section has been revised. The project proponent is no longer required to calculate the share of baseline plastic recycled and only needs to determine the amount of plastic waste recycled at baseline at validation.
14	NGO	Quantification	8.4	Equation 7: Is the purpose of the data to calculate the net recycled plastic waste? The purpose is to assess if the Net Plastic Waste is lower than EPWR		The purpose of this equation was to ensure that the project would only be recycling plastic waste that was not being recycled at baseline prior to the project and that the project would not be importing and/or generating plastic waste for the sake of recycling it. Section 8.3 (Eligible Plastic Waste Collection) however has been deleted in favor of a less burdensome applicability condition in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> that will serve as a qualitative check to ensure that the project is only recycling plastic waste that would not be recycled at baseline prior to the project. All equations and tables related to Section 8.3 have been deleted.

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36	Industry	Quantification	8.3	Plastic Waste Recycling in the region	<p>1. The amount of plastic waste recycled can exceed the amount of plastic waste generated in case the project is importing plastic waste for recycling. How does the methodology propose to deal with this situation?</p> <p>2. It is unlikely that data on "amount of recyclable plastic waste generated in the region" would be available</p>	<p>This section has been deleted and replaced by a less burdensome applicability condition in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> that will serve as a qualitative check to ensure that the project is only recycling plastic waste that would not have been recycled prior to implementation of the project activity, ensuring that there is recyclable plastic waste available in the region that would not have been recycled in the absence of the project.</p> <p>The project can only import plastic waste for recycling if the conditions in Section 4 of the methodology regarding the transboundary movement of waste are met.</p>
49	Service Provider	Quantification	8.3	<p>2 to 7: Data does not exist for this in many developing countries and data collection will be difficult and expensive. Can the default rates in Table 2 in Section 7.3.2 be used to estimate plastic waste generated?</p>		<p>Given the high burden that this section will likely place on projects, it has been deleted and replaced by a less burdensome applicability condition in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> that will serve as a qualitative check to ensure that the project is only recycling plastic waste that would not have been recycled at baseline prior to the project. This check will ensure that there is recyclable plastic waste available in the region that would not have been recycled in the absence of the project.</p> <p>Projects will not be required to determine the amount of plastic waste generated and will instead be required to demonstrate using publicly available information that there is sufficient recyclable plastic waste available in the region that is not being recycled.</p>
51	Industry	Quantification	8	<p>There is a lack of data regarding plastic recycling rates in remote communities. Searching for data is likely to take considerable time and effort to at most bring back data that is not accurate to the remote project (see next point).</p> <p>The data that is available is generally for major urban centres or at country level, each of which is likely unrepresentative of the actual recycling rates and activity of the remote project. A baseline assessment made on this data is likely to be inaccurate and overstated for the remote project.</p> <p>Any relevant baseline assessment calculated (assuming relevant data can be found) is likely to be low in any case and close to zero.</p> <p>If we are to take a proxy approach, it would seem given the data challenges and the likelihood to end up in a low baseline case, to help remote projects by allowing them to assume a default baseline of zero.</p>	Remote projects are allowed to assume a default baseline of zero.	<p>The <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> provides guidance on how projects shall apply Section 8 for the quantification of plastic waste recycled at baseline and by the project activity.</p> <p>An automatic baseline of zero is not included for the project activity type listed here as any existing recycling facility would only be eligible to issue credits on the added capacity, given that the project can demonstrate additionality. A capacity addition project would have to use the volume of waste recycled by the existing activity as the baseline volume of waste recycled. Only new project activities will be eligible to use a baseline of zero.</p> <p>While we recognize your point on the lack of availability of data, allowing all projects that are considered to be remote to use a baseline of zero will lead to potential over-crediting since it will not account for existing recycling taking place at baseline. Since only capacity addition projects are required to calculate baseline volumes and this volume is based on the activity of their existing facility, we see this data as being fairly straightforward to obtain.</p>

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74	NGO	Quantification	8.1.1	<p>Question 12</p> <p>a. Unable to comment.</p> <p>b. No. Needs expanding. Needs ingredient recipe disclosure from plastic producers, brands and plastic designers to determine accurately the portion of plastic and type of plastic in composite materials.</p> <p>c. Bio, CO and CO2-based RECYCLABLE & BIODEGRADABLE (NOT COMPOSTABLE)</p> <p>d. Full disclosure and listing of ingredients by plastic designers, producers as data sources to support and expand the factors in Table 3.</p>		The methodology is designed to be relevant to and usable by a wide range of recycling projects. Please refer to the response to comment #69.
89	Industry	Quantification	8.3	It would be useful to have some context as to the purpose of Section 8.3. We don't follow how that and the corresponding requirements in Section 8.4 fit together.	Please provide additional context as to the purpose of Section 8.3 and how it fits with the rest of the methodology.	Please review the response to comment #14.
61	NGO		0	Again our concerns about the sophistication of validation and monitoring benchmarks being beyond the capabilities of remote communities.		The requirements for monitoring of material recycled by the recycling facility have been simplified in the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> to only require measurement at the output of the facility and a cross-check with sales receipts to the final buyer or other equivalent third-party evidence. The requirements for monitoring are set at a level of stringency and comprehensiveness to ensure accuracy and precision of the data that is reported. The goal is to reduce the burden of these requirements while ensuring the accuracy and precision of the data.
90	Industry		0	Throughout the methodology, the unit of weight used for plastics is 'tonnes'. However, the Plastic Waste Reduction Standard notes that the unit of measure shall be kilograms for plastic material (and subsequent credits).	Ensure consistency between the methodology and the Plastic Waste Reduction Standard in terms of unit of weight.	The <i>Plastic Standard, v1.0</i> has been revised to use metric tonnes as the unit of weight for the Plastic Program (including for Plastic Credits). You will see these revisions in the final version of the <i>Plastic Standard</i> and other documents that will be released with the launch of the Plastic Program in February 2021.
91	Industry		0	It would be useful to have a list of eligible plastics that could be recycled under this methodology, or to include a reference to the Plastic Waste Reduction Standard for that same list.	As per comments in column D.	All projects will be required to reference the <i>Plastic Standard, v1.0</i> alongside the methodology. The Project Description Template that projects will be filling out with details on their activity(ies) will require that the <i>Plastic Standard, v1.0</i> is used as a reference for all the materials that are eligible under the scope of the Plastic Waste Reduction Program.

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52	Industry		0	<p>The Draft Methodologies do not address "Remote Projects". Remote Projects are similar to "Rural Projects" in that they have low population density, i.e. are small. However Remote Projects need to be distinguished from Rural Projects in that they are a significant distance from urban areas, and or separated by sea (i.e. islands), and or are coastal projects where significant plastic waste from other territories washes ashore.</p> <p>We therefore propose a new positive list criteria for the Collection Methodology which is "Remote Location" and a new project category for the Recycling Methodology which is "Remote Project".</p> <p>Remote recycling projects are very necessary for the success of the plastic credit system, but will be unfairly and significantly disadvantaged if treated the same as Urban or Rural projects. Remote recycling projects have profoundly different economics than do Urban or Rural projects, whereby they proportionately have additional cost and reduced revenues that typically make them very uninvestable. Additionally, access to accurate baseline data that supports Remote recycling project certification is severely limited compared to Urban or Rural projects, which has the effect of reducing the credit inventory that should rightly be available to them, making them even more uninvestable. Finally, communities that are attached to Remote recycling projects are by default the most vulnerable communities in the world and far more socially affected by the impact of plastic pollution. Therefore far more in need of the benefits of credits. On this basis, Remote recycling projects need to be dealt with differently compared to Urban or Rural projects.</p> <p>1. Remote Project's Different Economics Remote project economics are profoundly different to Urban or Rural projects, which applies to both Remote projects in undeveloped countries and developed countries, albeit with some subtle differences as noted as below.</p> <p>a. Remote projects are typically in distant locations from urban areas or separated by sea, i.e. islands, indigenous, etc, which gives rise to no or minimal access to local recycling markets for the sale of recycled plastic. If there are local recycling markets they are usually facilitated by "middlemen" who offer prices vastly lower than that found in urban recycling markets. This usually results in Remote projects having to freight their recycled material to urban recycling markets and in so doing incur substantial additional freight costs that otherwise are not incurred by Urban or Rural urban recyclers.</p>	<p>We therefore propose a new project category for the Recycling Methodology which is "Remote Project".</p> <p>We propose the definition of remote consider project locations that are: a significant distance from urban areas, and or separated by sea (i.e. islands), and or are coastal projects where significant plastic waste from other territories washes ashore.</p>	<p>The categories within the positive list of the <i>Plastic Waste Mechanical Recycling Methodology, v1.0</i> have been revised to enable determination of additionality for project activities where the confidence of additionality is high (i.e., projects in certain areas and managing specific material types). The project activities outlined here are considered to be covered by the project activities within the positive list.</p>

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

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				<p>c. Remote projects have reduced revenue potential due to inefficiencies of smaller volumes of recycled material they typically process. This manifests itself due to the typical minimum order requirements and the technical specifications that plastic moulders stipulate when purchasing recycling plastic material.</p> <p>Typical minimum order requirements for a single batch run of a plastic product can be in the region of 10 - 100 tonnes of input material, which is required in a single delivery. These minimum order requirements are typically well beyond the capacity of a Remote project, which means Remote projects are not an attractive supply source for recycled plastic material. Consequently, Remote projects are forced to sell the recycled material to middle men aggregators, who take a disproportionate share of the margin, thereby reducing Remote projects revenue potential compared to Urban or Rural projects. This situation creates a paradox in plastic recycling whereby higher volumes of plastic material supply results in higher prices per kilogram, but unfortunately this paradox can only be enjoyed by Urban or Rural projects.</p> <p>This price problem is made worse as Remote projects are less able to process material in increasingly precise specifications due to their processing equipment limitations. Today, compounders are looking for very accurate material segregation which can be achieved using advanced infrared and artificial intelligence sorting equipment. Regrettably, these technologies and the higher prices they bring, are simply not available to Remote projects.</p> <p>2. Remote Project's Lack Baseline Data Access to accurate data that supports Remote recycling project's certification, in particular it's additionality and baseline calculations, is severely limited compared to Urban or Rural projects which operate in data rich urban areas. This will result in Remote projects being forced to adopt urban or national data that almost always have higher rates of collection and recycling. Relying on urban or national data will have the effect of over exaggerating collection and recycling rates for Remote projects and therefore creating a higher baseline and reducing their true credit inventory.</p>		

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				<p>If you take Plastic Collective's Mantanani Island project in Malaysia, when we started the recycling project there 18 months ago, there was no waste management, leaving business and households to dispose of their waste, including all plastic waste, by burning, burying or dumping. This resulted in near 100% mismanagement and high leakage of plastic waste into the environment. In our attempts to baseline the project using published data from What a Waste Global Data there is no data available at local levels in Malaysia (other than Kuala Lumpur), let alone specifically Mantanani Island. The data available for Malaysia nationally indicates collection rates of 26.1% and recycling rates of 17.5%. This clearly and unfairly misstates the baseline for this project in Mantanani Island, Malaysia, which is near 0%.</p> <p>Similar baseline misstatement applies to all of our other Remote projects in, Bali Indonesia, Normanton and Bourke Town in the Gulf of Carpentaria, Bowraville in NSW Australia, Whitsundays Island, Australia.</p> <p>3. Social Impact of Plastic Pollution on Remote Communities It is vitally important that the plastic credit mechanism does not systematically disadvantage Remote recycling projects. Remote recycling projects are typically associated with Remote communities and remote locations. It is these communities that are already disproportionately impacted by plastic waste. For example, plastic waste litters their immediate environments, burning of plastic waste creates disease, their waterways are polluted, travel industries are affected, while island and coastal communities have a relentless plastic washing ashore. Plastic credits promises to make a profound and proportionately greater impact on Remote communities, but only if the plastic credit system addresses their unique circumstances.</p>		