Comments Received During the 15 July - 23 August 2020 Public Consultation on the Plastic Waste Reduction Program: Verra Responses 30 October 2020

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
1	Other	Standard	My little contribution is that, we are to commit the major companies that into bottling and drinks. Like coca cola, Pepsi, 7up, orange drinks company that into plastics to be paying incentives to us get the plastics back to the company for recycling production. For example, we can employ state coordinators and Local governments coordinators. Then area coordinators that will supervise each street for collection. Drop big bag for collection at every street junctions. Then ready to pay people that drop empty plastics in a bag. E.g drop 5 empty plastics and get a free drink or money in return. Secondly any state that get highest number of empty plastics will a prize or bonus after payment is made. This is can become a source of creating job to the youth. This is can serve a source of help for every nation in the world that is facing water pollution with Plastics on the ocean and this has cause alot of toxic in the ocean.		Thank you for these suggestions. While we agree that systems like the one you recommend can be successful in many areas, they are outside the scope of the Plastic Program. Projects under the Plastic Program may engage in activities like awarding prizes for cleanup or collection. However, it is the collection and/or recycling beyond business as usual that is credited under this Program.
2	Service Provider	Standard	We welcome the revisions and clarifications that have been made.		
3	Service Provider	Standard	Yes, the clarifications made since the previous version have made them easier to intepret (e.g. table 2: project configurations, the timeline in sections 3.5, 3.6).		
4	Service Provider	Standard	Some requirements may be burdensome for small capacity projects, or projects in remote locations for whom the processes and associated fees may inhibit their participation in the Plastic Accounting Program, however, we note that additions to the Standard v.02 go some way to address this.		We continue to develop the Program in a way that is not prohibitive for small scale or remote projects, including in the development of the quantification methodologies, the validation and verification system and Program fees.
5	Service Provider	Standard 2.1.1	We seek clarification whether polymers such as LLDPE would be eligible (the rationale is that it is chemically similar to LDPE, and therefore recycling facilities may treat both). We note that further details currently not outlined in the Standard (i.e. the form of the plastic), may be required by recycled material buyers.		Polymers like LLDPE are eligible under the scope of the Program. In the case of LLDPE, it is visibly and chemically similar to LDPE and is likely to get collected and recycled with LDPE as you have mentioned. Given that LLDPE is a type of LDPE and the language in Section 2.1.1 of the *Plastic Standard* v1.0 is not limiting to only plastic types explicitly mentioned, polymers like LLDPE are eligible. Projects that are interested in identifying materials managed by form can use the "material sub-type" category in Table 1 of the *Plastic Standard* v1.0. These sub-categories will provide further details on the shape and form of the plastic waste. Per Section 3.11.4 of the *Plastic Standard* v1.0, collection projects may also identify materials collected based on whether they are rigid, flexible or composite. These terms are defined in the *Plastic Program Definitions* v1.0.
6	Service Provider	Standard 4.1.10	We support the rationale behind batch verification, where this would streamline the processes and associated costs for smaller and more remote projects, enabling them to be included in the program.		Noted. This is valuable feedback.

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7	Service Provider	Standard 2.1.1	Example categories and sub-categories of plastic types are welcome.	Consider clarification whether accounting to this level is a requirement (though this could also be clarified in the methodologies). Consider whether/how similar polymers could be accounted for (e.g. could LLDPE be considered under LDPE as another type of flexible packaging with relatively similar chemical structure?)	Section 2 of the *Plastic Standard* v1.0 has been revised to highlight that material sub-categories don't have to be used for identification. Language has been included in Section 2.5 of the *Plastic Program Guide* v1.0 to indicate that the material types listed in Table 1 of the *Plastic Standard* v1.0 should be used for material classification. Since Section 2.1.1 (1) of the *Plastic Standard* v1.0 includes all materials made of the seven types of plastic in the scope and is not limiting to materials explicitly mentioned (e.g., LLDPE is a type of LDPE), similar polymers (especially visible and chemical similarity) can be accounted for in the same manner.
8	Service Provider	Standard 2.1.2	As written it seems that sorting could be eligible for a Waste recovery credit or recycling credit as an activity on its own (e.g. without first step recovery, or next steps in the recycling process). Is this the intention? Guidance may be needed to consider how double counting can be avoided.	Clarification whether sorting (either for recovery or recycling) can be eligible to generate waste recovery or recycling credits as an independent activity, and under what conditions for each credit type.	The scope in Section 2.1.2 of the *Plastic Standard* v1.0 includes sorting as an eligible activity type under the Program, however there is no language to explicitly state if and when it should be considered a collection or a recycling activity. Sorting will be included as an eligible activity in the methodologies for plastic waste collection and recycling, where Waste Collection Credits (formerly called Waste Recovery Credits) can be issued on plastic waste sorted out at a sorting facility in the project boundary under the Collection Methodology and Waste Recycling Credits can be issued on material recycled by a recycling facility that is purchased from a sorting facility under the Recycling Methodology.
9	Service Provider	Standard 3.3.2	This statement currently reads as though only one methodology should be used for both recovery and recycling, however the recovery and recycling methodologies are being developed as separate methodologies. Is this statement intended to avoid double counting (e.g. where plastic that is eligible for a waste recovery credit it is not automatically generate a recycling credit)?	Clarification of guidance of how methodologies should be applied to recovery and recycling (e.g. under which circumstances projects should use just one, and when projects can use both in conjunction with the other)	A project with both collection and recycling activities should apply different methodologies if one methodology doesn't address all the elements of both activities. We cannot be too specific in this requirement since the methodologies may evolve over time and all approved methodologies must be clear about the activities they cover.
10	Service Provider	Standard 3.14	The second bullet point could be mis-interpreted.	Rephrase the second part of the point (2) or make it a new bullet to clarify that they should receive protective equipment.	Section 3.14.2 in the *Plastic Standard* v1.0 has been revised to make this requirement more explicit, clarifying that project actors should receive ergonomically appropriate equipment and should not be exposed to toxic substances.
11	Service Provider	Standard 3.14	We agree with the intention to reduce labour from actors under 18 years of age. We note that plastic waste recovery activities are typically combined with awareness raising campaigns to reduce and collect plastic waste, and that there is a tendency towards education and involvement of children young people (often younger than 15 or the legal adult age) in such initiatives, and these are often voluntary. Can Verra provide a statement for guidance on such activities, particularly voluntary activities that involve young people?	Provide clarification statement or guidance box on how recovery and/or recycling projects may integrate young people as volunteer actors. For example, this could be in the context of young people voluntarily joining a beach clean-up, or schools hosting waste collection bins that young people bring waste to as part of waste recovery projects.	Section 3.14.7 in the *Plastic Standard* v1.0 has been revised to allow for project actors under the age of 18 to be involved in awareness raising and educational campaigns. As the requirement (3.14.7) currently stands, it does allow for the participation of children in the project activity as long as certain requirements are met. The updated requirement in Section 3.14.5(5) of the *Plastic Standard* v1.0 is meant to ensure that workers are not exploited under the guise of being volunteers. This requirement will apply to project actors under the age of 18 as well.
12	Service Provider	Standard 3.14	Our understanding is that volunteer projects (e.g. beach clean-ups) can be included as recovery projects. Will there be a safeguard to ensure that voluntary projects are voluntary because of the nature of the project (e.g. mass beach clean-ups as part of education campaigns or run by NGOs), and to avoid cases where projects are set up to be voluntary in place of remunerating paid workers? This distinction would be to ensure that volunteering is not being used in place of paid labour, and likewise that the conditions around voluntary projects are clarified.	Guidance box on voluntary projects - how projects can integrate volunteers into recovery activities (and recycling if applicable).	Section 3.14.5(5) has been added to the *Plastic Standard* v1.0 to ensure that project actors cannot be employed without compensation unless they are volunteers.

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13	Service Provider	Standard 3.6.1	Will the crediting period be the same for all project sizes?		Yes, the crediting period options (i.e., seven years twice renewable or ten years fixed) are the same for projects regardless of project size. This version of the standard does not differentiate requirements based on project size or scale. Future iterations may do so if necessary to ensure rigor and fairness in the Program.
14	Service Provider	Standard	Unclear how chemical recycling fits within the program	Include specific guidance on how chemical recycling fits within the Program (e.g. it can be a suitable end of life for recovery, but only counts as recycling if it can be proven that the plastic replaces virgin plastic)	Chemical recycling is included as an example of an activity type eligible under the Program in Section 2.1.2 of the *Plastic Standard* v1.0. The definition of chemical recycling in the *Plastic Program Definitions* v1.0 mentions the processes that can be considered chemical recycling. Per the definition, the conversion of plastic waste to a monomer or new raw materials (including specialty polymers, feedstocks for new plastics, fuels and waxes) through cracking, gasification or depolymerization will be considered chemical recycling as long as the plastic waste is not directly used for energy recovery and incineration.
15	Service Provider	Standard	Downcycling (or what are considered to be suitable end-of-life applications) should be directly addressed in the Standard	Clear reference to avoid 'downcycling' and/or specify whether certain end-of-life applications are considered suitable or not, or whether this can/will be determined in the methodologies/on project basis.	Downcycling is specific to the methodology for plastic waste recycling projects and so will not be addressed in the *Plastic Standard* v1.0. Applicability conditions will be included in the methodology to specify activities that cannot be deemed to be recycling activities. These applicability conditions are being developed taking into consideration the fact that most recycling activities do lead to some level of downcycling. The categorization of appropriate end-of-life options vary for different methodologies and will be included in the applicability conditions in the methodologies and not in the *Plastic Standard* v1.0.
16	Service Provider	Program Guide	Digital auditing - will there be guidance for how audits could be undertaken digitally to reduce in-person visits, and thereby audit costs while maintaining the credibility of the audit? For example, in the case of Multiple project instances, or Grouped projects - this could include a visit to one site at validation with in-person checks at set periods, and/or spot checks at credit issuance.	Suggest including guidance on how digital auditing (in place of or alternating with in-person visits) may be applied. For example if there are any specific project types or circumstances where this may be applicable.	Currently, Verra does not provide explicit guidance on digital auditing technologies and/or processes. Generally it is up to the auditing body to determine whether such approaches are appropriate and sufficient to achieve the required level of assurance. Verra occasionally provides guidance to project proponents and validation/verification bodies on events and/or circumstances (e.g., COVID-19) that may impact project and audit operations. Depending on the circumstances, Verra may allow VVBs to submit remote audit plans for review and approval by Verra. At any time, project proponents and VVBs may contact Verra to discuss digital or alternative auditing approaches.

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17	Service Provider	Program Definitions	Suggest adding a definition of 'vulnerable'; consider adding 'sorting' (specifically what sort of activities can be included, and/or that it includes 'material concentration') and providing examples of suitable end-of-life.		The definitions of "vulnerable people and groups" and "marginalized people and groups" have been added to the *Plastic Program Definitions* v1.0. A vulnerable group is one whose members lack the ability to anticipate, cope with, resist and recover from stresses or shocks due to physical, social, economic and environmental factors or processes. A marginalized group is one whose members are unable to participate fully in economic, social, political and cultural life. The definition of sorting has also been included in the *Plastic Program Definitions* v1.0 as the separation of collected waste material into different categories of recyclable and non-recyclable materials to facilitate further processing. However, no criteria have been provided for what can and cannot be considered sorting since the methodologies will provide applicability conditions to determine the eligibility of project activities and for project proponents of sorting activities to determine if they can issue Waste Collection Credits or Waste Recycling Credits. Material concentration will not be addressed in the *Plastic Program Definitions* v1.0 since it is more relevant to recycling and will be included in the methodology for plastic waste recycling activities. Examples of suitable end-of-life options (and options that are not eligible) will be included in the applicability conditions in the methodologies.
18	Service Provider	Program Definitions Recovery	Should recovery include recovery from the material recovery facility (MRF), or to the MRF? In the case of recovery from the MRF, is this intended to cover sorting (of plastic from non-plastic waste)?		Verra is now using the term "collection" instead of "recovery" in the Plastic Program. Verra agrees that it does not make the most sense to allow "collection" from the material recovery facility (MRF). While a MRF that is sorting plastic waste from non-plastic waste can issue Waste Collection Credits, collection of plastic waste from a MRF by an external entity should not be considered a collection activity. The definition of "collection" has been revised in the *Plastic Program Definitions* v1.0 to reflect this. The definition of "collection" has been revised to indicate that the logistical process of moving plastic waste from its source to an appropriate destination, per a Plastic Waste Reduction Program methodology, is considered a collection activity. The inclusion of sorting as a sub-activity under collection will be included in the methodology for plastic waste collection projects.
19	Service Provider	Program Definitions Recycling	Is this clear enough to avoid downcycling?	Clear reference to address downcycling. For example, this could include a quality statement or requirement that the output displaces virgin plastic material.	The definition of "recycling" in the *Plastic Program Definitions* v1.0 has been revised to ensure that certain activity types (e.g. use of plastic waste for road construction or other applications that have a high risk of leaking into the environment at a later point in time) are not considered recycling. Eventually however, all recycling is inevitably downcycling to a certain degree. Further guidance on activities that can and cannot be considered recycling will be provided through the applicability conditions in the methodologies. Verra is currently refraining from imposing quality control requirements on the quality of the recycled material output since different activity types managing different types of plastic in different geographies are not likely to be able to produce the same quality of recycled material. A quality control requirement will likely impose a higher barrier to entry than intended for the Program.

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20	Service Provider	Program Definitions Controlled incineration	The definition could be clearer about the setting of the incineration.	Consider refering to incineration in a closed/controlled environment? It may be worth specifically refering to 'open burning' within this or as its own definition.	The definition of "controlled incineration" has been revised to include that it is the controlled combustion of biogenic and fossil based products and that ash is an important by-product of incomplete combustion in the *Plastic Program Definitions* v1.0. The definition of "open burning" has been included in the *Plastic Program Definitions* v1.0.

"Open burning" has been defined as uncontrolled waste combustion practices that occur at low temperatures and in oxygen-deprived environments, leading to incomplete combustion. |
| 21 | Service Provider | Program Definitions Stakeholder group | "In addition to groups whose values are different from those other groups" could be clarified further. | Consider rephrasing to avoid confusion | Modified the definition of "Stakeholder Group" by adding the phase "(but not necessarily mutually exclusive of)". |
| 22 | Service Provider | Program Definitions Landfill | This is mentioned in the Standard, but not included in the definitions as other end-of-life scenarios are. | Consider including a definition for either generic landfill, or managed/unmanaged landfill so that all methodologies & program documents follow the same definition(s). | The definitions of "managed landfill" and "unmanaged landfill" have been included in the *Plastic Program Definitions* v1.0. A managed landfill is one that is controlled and operated under regulated conditions, where waste is unlikely to leak into the environment over time. Applicability conditions for a managed landfill are included in the definition. An unmanaged landfill is defined as being a waste disposal site that does not meet the definition of a "managed landfill". |
| 23 | Industry | Standard 1.1 | "the most recent version of the document shall be used."

Where can the msot recent version be found | | The most recent version of all program documents will be published on the Verra website. When a document is revised the previous version will be removed from the website. Users can refer to the document history section of the latest version of each document to understand the changes made in each document update. |
| 24 | Industry | Standard 2.1.1 (1) | "Other Plastics (O)"

This is not a plastic type and the use of 7 is not clear. It can be other polymers and material combinations. Basically, all polymers are there fore included?! There is no focus on the big 3? | | (7) Other Plastics is an official SPI resin code. We run the risk of excluding materials like toys, food packaging and construction materials from not including this resin code in the scope. It includes "other" polymer types and multi-layer combinations of more than one resin. The Plastic Program aims to incentivize the recovery and recycling of all types of plastic waste and has developed the scope to achieve the same. |
| 25 | Industry | Standard 2.1.1 | Table 1: You are missing Flexibles, mono-material in Composite materials | | Table 1 in Section 2.1 of the *Plastic Standard* v1.0 has been created with the understanding that mono-material implies that the material is only made of one type of plastic/a single polymer type (which is covered in Table 1 of the *Plastic Standard*) or contains only one type of plastic (which is covered under composite materials in Table 1). |
| 26 | Industry | Standard 2.1.1 | "Are there material categories, material sub-categories and/or examples that should be explicitly included in the scope or excluded from it?"

For packaging I think that the focus should be on the main materials, inline with all the standardization efforts currently ongoing. | | Verra agrees with your suggestion. The scope of the Program currently includes main packaging material types prevalent in the market (PET bottles, used beverage cartons, LDPE films and flexibles) |
| 27 | Industry | Standard 2.1.2 (1) | Can we add a definition of Plastic waste recovery credits and recycling credits? What activities are in scope etc. | | The two credit types have been renamed to Waste Collection Credits and Waste Recycling Credits. Both are defined in the *Plastic Program Definitions* v1.0. Activities included in the scope of the program are covered in the *Plastic Standard* v1.0 and in the methodologies. |
| 28 | Industry | Standard 2.1.2 (1) | "mechanical recycling and chemical recycling"

Why not all? Or what is the definition of chemical recycling used here? | | Chemical recycling is defined in the *Plastic Program Definitions* v1.0. The language in Section 2.1.2 (1) of the *Plastic Standard* v1.0 reads, "among others", implying that recycling activity types other than mechanical and chemical recycling activities are included in the scope of the Program as along as they meet the applicability conditions in the relevant methodologies. |

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29	Industry	Standard 2.1.2 (1)	"Plastic waste sorting can be considered a recovery or a recycling activity" Why should it? Adding an own definition of recovery and recycling here is confusing. It should depend on the fact whether the sorted fraction is going into recycling or recovery.		See response to comment #8
30	Industry	Standard 3.3	"Table 2: Project configuartions"	Project activity configuration?	Table 2 lists the eligible ways a project could be configured based on the number of activity instances and activity types included in the project, rather than the eligible configurations of project activities.
31	Industry	Standard 3.3	"Table 2 : Recovery of recyclable plastic from one landfill and one mechanical recycling facility" Is this not contradictory to what had been described above on collection? What if the recovery from landfill is used to feed into the mechanical recycling facility? Is it one activity or two?		The example has been revised for "multiple project activities" and "multiple instances of multiple project activities" in Table 2 under Section 3.3 of the *Plastic Standard* v1.0 for increased clarity.
32	Industry	Standard 3.14.2	Should we not expect all projects to run a Health and Safety risk assessments first? Measures in place should then show how identified risks have been addressed.		The *Project Description Template v1.0* will require the project proponent to share baseline environmental and social conditions, providing an overview of these conditions prior to the implementation of the project activity. Project proponents will then be required to demonstrate how the safeguard requirements have been met in the safeguards section of the template, providing details on the changes (if any) from the baseline environmental and social conditions.
33	Industry	Standard 3.14.2	"Preventative measures shall be put in place to **reduce** health impacts within the project boundary on the project actors and community." Reduce is not strong enough.	Avoid, would be more appropriate.	The term "reduce health impacts" has been replaced with the term "avoid negative health impacts" to indicate that projects certified under the *Plastic Standard* should do their best to avoid negative health impacts.
34	Industry	Standard 3.14.16	"Additional certification standards may be applied to demonstrate positive social and environmental impacts." Does this mean that some certifications would allow reduced reporting on the social and environmental criteria? If so, possible certifications should be defined.		Certification under other standards may provide sufficient evidence to meet requirements of the Plastic Program, so we've added clarification about the conditions under which that could be the case and how to refer to additional certifications in Plastic Program documentation. We also added clarification on labeling with additional certifications.
35	Industry	Standard 4.1.10	We would like to learn more about the batch verification before we provide feedback. It is important that initial verification is completed before approval, with a follow up every three years. If batch verification could reduce assessment cost while providing reliable results, it should be investigated further		The verification batching process will be designed to reduce costs for projects and streamline the assessment process through grouping of projects in, for example, the same geographic region. Although this piece is still under development, we envision that in order to be eligible to participate in the verification batching process, projects will need to be registered (i.e., validated to a reasonable level of assurance). Verra will develop the process with input from other standards bodies that have implemented similar mechanisms and program stakeholders.
36	Industry	Standard 4.1.21	3 year rotation requirement seems right.		This is valuable feedback. The three-year rotation requirement ensures a new VVB is conducting audits to a reasonable level of assurance every three years, but allows projects to reduce costs by contracting the same VVB to verify three consecutive years of a project's recovered and/or recycled plastic.

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37	Industry	Standard	While it is a very good initiative to implement a plastic credit scheme, a few notes: 1) We still do not have access to the full suite of the program documents which are essential to provide provide meaningful feedback. 2) Not sure how this offset scheme will operate on a voluntary basis when there is no clear guideline on how other members join and trade with those earned credits. There also needs to be a clear dollar value placed on those credits in order to incentivise this scheme. 3) How will this impact other plastic policy regulating guideline, in terms of EPR fees. The detailed analyses should be provided by Verra on how this will impact or interplay with the EPR fees. 4) Even though the document sets out in abstract steps of how the programs are approved and the credits are in principle earned, there should be a worked example of the fees entailed and the flow of steps pictorially with snapshots of the registry. 5) The word representation should be replaced for clarity.		1) Draft versions of the three key program documents were made available during the public consultation. We are developing two methodologies for the quantification of collected and recycled plastic waste, which will be open for consultation in October. The remaining program documents include project documentation templates and legal documents and will be made available upon Program launch in early 2021. 2) Entities do not have to be a member of the 3R Initiative to develop a project under the Plastic Program, or issue or purchase Plastic Credits. Credit prices will be determined by the market and will likely vary based on project type, plastic type and geographic location. 3) The issuance and purchase of Plastic Credits do not conflict with EPR schemes. Companies that pay EPR fees in certain geographies may choose to purchase Plastic Credits from projects in other geographies to address their footprint and geographies that do not have an EPR scheme. In the future, EPR schemes could recognize the purchase of Plastic Credits as a form of qualifying payment under the scheme. 4) We understand that the project development process is complex and we will develop a graphic showing the complete project lifecycle, with timelines, to be available on the Verra website. 5) Representation is a legal term used in the Plastic Program. We will clarify the use of this term to the extent possible.
38	Industry	Program Guide 1.1	"In addition, clarification documents may be issued to provide additional guidance on Plastic Program rules or methodological requirements." Can the methodological requirements be published with prior to rolling out the program?		The two methodologies currently under development will be open for public consultation in October and the final versions will be released at Program launch. The text you highlighted demonstrates our intention to provide additional guidance on topics such as Program rules or methodological requirements, as necessary, in addition to the rules and requirements themselves.
39	Industry	Program Guide 1.1	"New versions of the Plastic Program will be issued on a periodic basis when major edition updates are required." Should this be subject to the input of the program participants?		Yes, all major edition updates and the specific topics that are being considered for an update will go through stakeholder consultation prior to the release of an update. Updates typically serve to address parts of the Program that can be improved or should be revised in response to the evolving market.
40	Industry	Program Guide 2.1	"The Plastic Program establishes the rules and requirements that operationalize the Plastic Waste Reduction Standard (Plastic Standard) to enable the **validation** of plastic waste recovery and recycling projects, and the verification of the impacts of those activities." Certification, maybe? Endorsement? Accreditation? The use of the word here will depend on what is envisaged by this exercise. Will Verra certify, accredit, endorse the projects should they be compliant with the specs?		Projects must be validated by a third-party in order to become registered under the Plastic Program. The resulting impacts of those projects and their activities must be verified, also by a third-party, particularly if the project proponent is interested in issuing Plastic Credits. In summary, validation and verification refer to the activities conducted by a third-party, while registration and credit issuance refer to processes associated with Verra. Certification can refer to all of these components of the project lifecycle combined.
41	Industry	Program Guide 2.4 (1a)	"Plastic Standard" Plastic recycling program standards.		The full name of the Standard is '*Plastic Waste Reduction Standard*' and both recovery and recycling activities are included in the Program scope.
42	Industry	Program Guide 2.4 (1b)	"Plastic Methodology Requirements" We still do not have access to the full suite of the program documents which are essential to provide provide meaningful feedback		The two methodologies currently under development will be open for public consultation in October. The rules and requirements in the *Plastic Standard* must inform the methodologies and therefore needed to be developed prior to the methodologies.
43	Industry	Program Guide 2.5		Proposed revised sentence: Together, WRCs and RCCs are referred to as Plastic Credits. Each Plastic Credit represents, **depending on the type of project,** an increase of one kilogram of recovered or recycled plastic waste achieved by a~~each~~ project	We revised this section of the *Program Guide* for clarity.

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44	Industry	Program Guide 2.5	"Projects that cause plastic to be **recovered** may be issued WRCs while projects that cause plastic to be recycled may be issued RCCs." As recovery is defined in many legislations as synonymous to recycling albeit in a different sense. Probably best to replace with collection, if the intent is to cater for collection of plastics?.		Verra has replaced the use of the term "recovery" with "collection" in the Plastic Program to draw a clear distinction between the two processes. Waste Recovery Credits (WRCs) have been renamed to Waste Collection Credits (WCCs). The intent behind using the term "collection" is to cater to projects that undertake the logistical process of moving plastic waste from its source to an appropriate destination, criteria for which will be further defined by the Plastic Waste Reduction Program methodologies .
45	Industry	Program Guide 3.1	"Project proponents assume limited liability for replacement of excess Plastic Credits, as set out in Section 5.12.5." Clarity and unable to provide further comments without explanation.		Issuance and replacement of excess Plastic Credits is further described in Section 5.12 of the *Program Guide*.
46	Industry	Program Guide 3.1.1	"Such accession and release is handled via **representations** made by acceding entities and project proponents as follows:" Is this used in its ordinary meaning?		Representations in this case refers to a deed issued by the project proponent and an acceding entity, made in respect of an acceding entity joining a project as a project proponent and which is prepared using a template that will be made available once the Program is launched.
47	Industry	Program Guide 3.1.1 (1)		Suggested revision: Where an entity wants to join a project, it and the existing project proponent(s) shall sign an accession ~~representation~~ **agreement**, which shall be prepared using the Plastic Program Deed of Accession Template and properly executed as a deed in accordance with applicable local laws and the organization's own constitutional documents.	Representation in this case refers to a deed issued by the project proponent and an acceding entity, made in respect of an acceding entity joining a project as a project proponent and which is prepared using a template that will be made available once the Program is launched.
48	Industry	Program Guide 3.1.1 (1)	"Where an entity wants to join a project, it and the existing project proponent(s) shall sign an accession representation , which shall be prepared using the Plastic Program Deed of Accession Template and properly executed as a deed in accordance with **applicable local laws** and the organization's own constitutional documents."	This cannot be left open for interpretation; we suggest adding English law.	This comment raises two issues: 1) the governing law of the Deed of Accession, and 2) the legally valid way in which an entity executes any legal agreement. 1) While a reference to the specific governing law does not need to be included in the *Plastic Program Guide*, the documents which create a legally binding relationship between the project proponent and the Verra registry do need to have a governing law and dispute resolution process specified. Verra uses English Law in all deeds of representation. 2) The basis upon which an entity can enter into a legally binding agreement depends on the authorization provided in its constitution or other governing documents and the corporation's/company's law that regulates its existence and performance. For example, some companies can execute instruments by authorized officers and in other cases authorization may require two directors or a company seal to be affixed. In each case, this is a matter for the entity to determine and is therefore appropriate to state in the *Plastic Program Guide* that execution is "in accordance with applicable local laws and the organization's own constitutional documents".
49	Industry	Program Guide 3.1.1 (2)	"Where a project proponent wants to leave a project (i.e., give up its rights and obligations in respect of the project), it, the remaining project proponent(s) and the Verra registry shall sign a **partial release** representation," What is meant by partial release?	Should be a deed of release, releasing the exiting party from all of its obligations given that they have been verified, validated and approved.	This is a partial release because it is only releasing one of multiple entities from its obligations with respect to the project, based on the entities that were listed in the registration representation.
50	Industry	Program Guide 3.1.1 (4)	What happens to the already issued credit by the exiting member?		The management of credits issued by the released project proponent is dependent on the legal and business arrangement between the relevant parties (i.e., the project proponents). The handling of such credits is for the two (or more) contractual parties to manage.

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51	Industry	Program Guide 3.1.1 (note)	Would you mind clarifying the legal basis of this?		The legal basis for requiring the new entity to accede to the project before allowing the existing project proponent to be released from the project is to protect the rights of parties who are entitled to rely on the Registration Deed of Representation (e.g. Verra, holders of Plastic Credits generated by the project, and persons on whose behalf Plastic Credits were retired by an account holder). From the commencement date of the deed of accession, these parties will be able to enforce the Registration Deed of Representation against the acceding party, thereby ensuring that there is no "gap" during which the Registration Deed of Representation will not be enforceable.
52	Industry	Program Guide 3.6	"Verra may convene steering committees, advisory committees or working groups to support its work in specific areas. These groups bring in expertise from outside the organization to develop and support specific elements of the Plastic Program. A full list of committees is available on the Verra website." Who will participate and how will the participants be chosen?		Such groups will be established in a similar manner to how we established the Plastic Standard Development Committee where an open call was posted publicly and applicants were selected based on their knowledge of the waste management or packaging sectors, understanding of circularity concepts, understanding of sustainability standards, experience working with credit-generating standards, and working knowledge of the drivers of corporate demand for plastic waste recycling and recovery. Verra always aims for such groups to reflect a balance of stakeholders.
53	Industry	Program Guide 5.1	It's not clear the purpose of submitting a draft monitoring report to Verra. Can this be clarified? Step 5 of Diagram 2		Project proponents will submit the monitoring report to Verra prior to verification. The monitoring report will be posted on the Verra registry for a 30-day public comment period. This will allow stakeholders to submit any comments on the implementation and monitoring of the project, and these comments will be sent to the third-party auditor to be assessed as part of the verification. Sections 5.3 and 5.6.5 of the *Program Guide* set out this requirement.
54	Industry	Program Guide 5.2.2		Suggested change: "For example, a would-be prospective project proponent does not need to have a validated or verified project and a ~~would-be~~ **prospective** Plastic Credit buyer does not need to have entered into a legal agreement to purchase Plastic Credits in order to open a Verra registry account."	This suggestion is helpful and both instances of "would-be" in Section 5.2.2 of the *Program Guide* have been replaced to improve readability.
55	Industry	Program Guide 5.2.4	What are the list fees and more broadly what are the fees entailed in this program?		The Fee Schedule will be made publicly available at the launch of the *Plastic Standard*. The two main fees charged by the Plastic Program are a one-time, per project registration fee and a per-Plastic Credit issuance levy.
56	Industry	Program Guide 5.3.3		Suggested change: "At the end of the public comment period, Verra provides ~~any and~~ all comments received to the project proponent."	This suggestion is helpful. "Any and all" has been changed to "any" in Sections 5.1 and 5.3.3 of the *Program Guide*, and Section 3.13.16 of the *Plastic Standard*. "Any and all" remains in Sections 3.1, 5.9.1 and 5.10.1 of the *Program Guide*, and Section 1.2 of the *Plastic Standard*, as it is more appropriate given the context of the requirements.
57	Industry	Program Guide 5.3.4	We may need to be given the opportunity to discuss the comments before going public.		When a comment is received during a project's 30-day public comment period (before validation and/or verification), Verra sends the comment directly to the project proponent. The project proponent is required to summarize and address the comment in the project description and/or monitoring report. During the audit, the validation/verification body (VVB) assesses whether the comment was adequately addressed by the project proponent. The comment is also posted publicly on the Verra registry, but the project proponent has the opportunity to discuss and address the comments in the project documents, which will also be made public once validated/verified and approved by Verra.

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58	Industry	Program Guide 5.5	"Should the Plastic Program allow projects to utilize vintage periods, and would they be helpful for prospective Plastic Credit buyers?" I don't see the need of this (vintage periods) for us		Noted. Project proponents will not be required to split verification periods into vintages; however, buyers may want to purchase Plastic Credits from a particular time period. The option to use vintages will likely be available for those who wish to use it, but it is not compulsory.
59	Industry	Program Guide 5.11.1	Verifications every three years would be sufficient.		This is valuable feedback. The three-year rotation requirement ensures a new VVB is conducting audits to a reasonable level of assurance every three years, but allows projects to reduce costs by contracting the same VVB to verify three consecutive years of a project's recovered and/or recycled plastic.
60	Industry	Program Guide 5.11.2 (1)	"The project proponent shall submit a letter (in English)" This seems to limiting. Other options/languages should also be considered.		In order for Verra registry staff to apply the necessary level of scrutiny and ensure a formal withdrawal request has been made, these letters must be submitted in English.
61	Industry	Program Guide 5.12.4, Table 2 (1,1)	"Validation/verification body shall conduct a root cause analysis" Is it correct that the cost of this further verification would need to be bared by the project proponent.	The wording should be changed to make this clear here.	No, a project proponent will not have to pay any additional fees in association with quality control of projects and/or a root cause analysis. A root cause analysis is conducted by a validation/verification body to determine why a material issue or error occurred during a review.
62	Industry	Program Guide 5.12.4, Table 2 (2,1)	"Validation/verification body shall conduct a root cause analysis" What is meant here by the root cause analyses? Why is this needed, if the project doesn't qualify? The performance issues would not be linked with the verification body, but to the project?		Root cause analyses are related to VVB performance. If a material quality issue is identified after a project is registered, for example, the VVB is required to conduct a "root cause analysis" to determine why such an error occurred during the course of the review. That is, if an error was made by the project proponent in the quantification of recovered/recycled plastic, for example, the VVB must conduct a root cause analysis to determine why the error was not identified during the initial audit.
63	Industry	Program Guide 6.2		Suggested change: Such methodology elements are subject to review by Verra, a global stakeholder consultation hosted on the Verra website and independent assessment by one validation/verification body, before final approval by Verra **and the project proponents.**	It is Verra, as the standard setter, that provides final approval of methodologies. Project proponents are encouraged to participate in the public consultation to help ensure the methodology is appropriate in the global context.
64	Industry	Program Guide 6.3		Verra may periodically review methodology elements approved under the Plastic Program to ensure they continue to reflect best practice and scientific consensus **along with the project proponents.**	Proper consultation will be conducted by Verra when reviewing methodology elements, but it is not within the project proponent's role to conduct periodic reviews of methodology elements.
65	Industry	Program Guide 7	The Verra document states that Verra's board decision is final and binding. There needs to be an independent way of solving disputes.		At the project level, if a third-party validation/verification body (VVB) finds a problem with the project's required grievance redress procedure or is contacted by project stakeholders about a complaint through an audit's public consultation or site visit, the VVB will ensure that the complaint is resolved to its satisfaction before rendering an assessment decision. At the programmatic level, by their participation in the Plastic Program all entities referred to in Section 3 of the *Plastic Program Guide* are subject to its rules and to Verra's highest authority, its Board of Directors.
66	Industry	Program Definitions Accession representation	Why is the term representation used out of context? What does it mean? A representation is best kept in its ordinary meaning. This definition might need a few braces. Maybe substitute this by Plastic Program Deed of Accession Template.		Representation in this case refers to a deed issued by the project proponent and an acceding entity, made in respect of an acceding entity joining a project as a project proponent and which is prepared using a template that will be made available once the Program is launched.
67	Industry	Program Definitions Authorized representative	Where is this (communications agreement) document		The current Communications Agreement can be found on the Verra website here.

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68	Industry	Program Definitions Cancellation	This requires a bit more clarity on what is meant by this? Is it meant to be the cancellation of the credits once the agreement is terminated? What is meant by retirement? Revocation or cancellation of plastic credit when a party is terminated.	Suggested change: The permanent removal of a Plastic Credit ~~from circulation~~ in the Verra registry for purposes other than retirement (e.g., compensating for excess Plastic Credit issuance)	The definitions of "retirement" and "cancellation" have been revised slightly in the *Plastic Program Definitions* v1.0 for increased clarity. Retirement is the permanent removal of a Plastic Credit from circulation in the Verra registry to use towards footprint mitigation, and precludes any further transaction of the credit. Cancellation is the permanent removal of a Plastic Credit from circulation in the Verra registry for purposes other than retirement (e.g. to compensate for extra Plastic Credit issuance).
69	Industry	Program Definitions Collection	As long as it does not end up in landfill, this is collection – to discuss with Jochen.	Suggested change: The logistical process of moving ~~plastic w~~Waste from its source (e.g., point of use and/or disposal) to the point of treatment or ~~landfill disposal~~ (modified from ISO 472:2013(en) Plastics — Vocabulary by the addition of source examples and change of end point)	Verra has replaced the use of the term "recovery" with "collection" in the Plastic Program, where collection may include a managed landfill as an appropriate end-of-life option. The applicability conditions for what is considered a managed landfill will be included in the *Plastic Program Definitions* v1.0. A managed landfill is included as an appropriate end-of-life option for collection projects that cannot reasonably access end-of-life options with greater environmental benefit than a managed landfill. This is to encourage the collection of waste by these projects from sources with lower environmental benefit than a managed landfill. Collection is defined as "the logistical process of moving plastic waste from its source to an appropriate destination, per a Plastic Waste Reduction Program methodology " in the *Plastic Program Definitions* v1.0.
70	Industry	Program Definitions Commercially sensitive information		Suggested change: Trade secrets, financial, commercial, scientific, technical or other information whose disclosure could reasonably be expected to result in **disrepute** or ~~a~~ material financial loss or gain, prejudice the outcome of contractual or other negotiations or otherwise damage or enrich the person or entity to which the information relates.	This definition will not be changed to maintain consistency with the definition of the term in other Verra programs.
71	Industry	Program Definitions Recovery	Is this an ISO definition		Verra has replaced the use of the term "recovery" with "collection" in the Plastic Program. The definition of "collection" has been revised to "the logistical process of moving plastic waste from its source to an appropriate destination, per a Plastic Waste Reduction Program methodology". This definition is based on the ISO 472:2013 definition of "collection" with "place where it can be recovered" removed and "to an appropriate destination, per a Plastic Waste Reduction Program methodology" included.
72	Industry	Program Definitions Validation	What are the validation mechanism guidance, the work need to be channelled here? Can't we substitute with "certification"?		Projects must be validated by a third-party in order to become registered under the Plastic Program. The resulting impacts of those projects and their activities must be verified, also by a third-party, particularly if the project proponent is interested in issuing Plastic Credits. In summary, validation and verification refer to the activities conducted by a third-party, while registration and credit issuance refer to processes associated with Verra. Certification can refer to all of these components of the project lifecycle combined.
73	Industry	Program Definitions Waste		Suggested change: ~~Post-use material not in the process of being recycled or recycled~~ any discarded, rejected, unwanted, surplus or abandoned plastic packaging material that is discharged, emitted or deposited in the environment in such volume, constituency or manner as to cause an alteration in the environment.	The definition of "waste" has been revised in the *Plastic Program Definitions* v1.0 per your suggestion. The definition has been revised to indicate that any post-use or post-industrial material that is discarded, rejected, unwanted, surplus or abandoned and is not being recovered for appropriate end-of-life management is considered waste.

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74	Industry	Program Definitions Waste Recovery Credit (WRC)		**The equivalent of one (1)** A credit issued by, and held in the Verra registry representing the right of the account holder in whose account the credit is recorded to claim the achievement of recovered plastic waste in an amount of one (1) kilogram (kg) of plastic that has been verified by a validation/verification body **appointed by XXX** as recovered in accordance with the Plastic Program rules. **The issuance** Recordation of a Waste Recovery Credit in to the account of the holder at the Verra registry is prima facie evidence of that holder's entitlement to that Waste Recovery Credit.	This definition has not been changed to maintain consistency with the definition of a credit/unit in other Verra programs.
75	Service Provider	Standard 2.1.1	We believe that it's important to include material categories and sub-categories of all possible waste in order bring explicit identification in the scope. The section in the Standard already includes sub- categories and examples, which is important for project developers to refer. However, under the category "Other Plastics" the standard may keep provision to include and define other types also which are not listed in the document. In the PD document, project proponent should select/define/list the specific plastic types being included under the project.		As mentioned in Section 2.1.1 of the *Plastic Standard* v1.0, the examples provided in Table 1 are not exhaustive. The scope of the Program includes products that are not listed in the table. Per Section 2.1.1(1a), the list of "Other Plastics" is also not exhaustive and can potentially include other types of plastic. Plastic waste recycling projects will be required to identify the materials recycled by material type in the Project Description template, while recovery projects will have the option to do so.
76	Service Provider	Standard 4.1.10	The batch verification could be an important provision, but specifically for Grouped projects. For standalone projects batch verification will not be relevant as verification activities shall be conducted under the specific guidelines of the applied methodology and registered monitoring plan, which will be based on certain monitoring parameters. Therefore, for standalone or non-grouped activities, VVB shall verify the particular project activity that will be based on monitored parameters controlled and managed by the project proponent. But in case of group projects, the instances may be in different geographies, their activity types, required monitoring parameters etc. could be different. So for such grouped projects, batch verification will be an important provision. So we recommend the inclusion of batch verification. We also believe that such batch verification will be more appropriate at the context of sampling survey based verification. So there could be a provision of defining batches under the sampling monitoring plan, wherever applicable/referred by project proponent, so that at the time of monitoring and verification sampling frames can be defined precisely and sampling verification can be done with a reliable and reasonable level of assurance.		Thank you for this valuable feedback. In terms of batch verification, we will take these suggestions into account as we further develop the process. The three-year time frame refers to requiring a reasonable level of assurance at validation and every three years. For example, a project may complete validation in 2020 and then monitor recycled plastic waste for one year in 2021. A limited level of assurance would be required at the verification of the 2021 monitoring period. In terms of VVB rotation, which is set out in Section 4.1.20, a VVB will not be able to verify more than three consecutive years of a project's collected and/or recycled plastic waste.

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76	Service Provider	Standard 4.1.10	With regards to temporal boundary, we believe that three-year time frame will be more supportive to project developers. Initially, we assume that there will be limited VVB who may qualify to validate and verify Plastic Projects. Also cost of validation & verification will play an important role in plastic projects to transform into the new market; hence three-year or more periods may give project proponents a better provision to select and engage with VVB with better commercial terms. However, approval of VVB and their credentials will be completely under the purview of VERRA (as per the provision of Program Guide), hence level of assurance shall not be hindered by any means. However, for this time-frame related aspect we would like to highlight the points as follows: 1) Will this proposed three-year time frame be based on number of maximum verification within three-year frame? Or will this be related to single verification covering upto three-year timeline at once. This clarification is important to confirm the provision included by VERRA. 2) There are provisions of VVB timeline given under the section 4.1.21, so not sure how this comment section is different than the other section reported under 4.1.21.		See response above.
77	Service Provider	Standard 4.1.21 (2)	We would like to respond to this comment with relation to the previous response. The cost of validation & verification will play an important role in plastic projects to transform into the new market mechanism; hence three-year period may be extended reasonably to provide project proponents a better provision to select and engage with VVB with better commercial terms. We also assume that initially there will be limited VVB who may qualify to validate and verify Plastic Projects, therefore extended rotational timeline for VVB could be more supportive. Alternatively, we could like to recommend that such rotational timeline for VVB can be linked with the project size. Here project size could be based on ex-ante projected plastic credits (similar to VCS). For large scale capacity the rotational period can be lesser (say 3 years), however for small scale capacity projects this can be extended to 6 years.		Thank you for this feedback. We developed all of the requirements, including the validation and verification requirements, with smaller projects in mind and goals of minimizing costs and streamlining processes. Given that a reasonable level of assurance is required only every three years, we propose maintaining a three-year VVB rotation requirement. However, recognizing that there may be a limited number of approved VVBs early on and other circumstances associated with the development of the market, Verra may provide projects with flexibility and/or exemptions to the VVB rotation requirement on a case-by-case basis.
78	Service Provider	Program Guide 3.3	Yes, our suggestion is that the VVB must have at least one sectoral expert having practical knowledge and experience in the Waste Management sector; and one working professional from the socio-environmental background. We believe that social value chain associated with plastic projects is one of the key components. For understanding of both baseline and project additionality, it is important to understand the socio-environmental background of such project region in addition to technical elements of the project.		Thank you for this helpful feedback.
79	Service Provider	Program Guide 5.5.2	Yes, it's important from buyers prospective. From the experience of VCS projects and other market mechanisms, we strongly believe that vintage wise breakup of plastic credits and respective vintage issuances are important. Therefore, project document must include a specific table to present vintage breakup of Plastic Credits. While applying for issuance, VERRA may also allow projects to request issuance vintage wise.		Noted. This is helpful feedback. Project proponents will not be required to split verification periods into vintages; however, the option will likely be available for those who wish to do so.

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80	Service Provider	Program Guide 5.11.1	Yes, we recommend that the guidance for plastic projects should also be similar to CCB & SD standards. However, as the mechanism is comparatively newer and development of a robust market framework may take some time, therefore we recommend to use "validation within two years of listing on the Verra registry, and to complete verification within five years of validation".		Noted. This is helpful feedback. Recognizing that this is a new mechanism and in order to reduce additional burden on projects, the first version of the Plastic Program will not include validation and verification interval requirements. Such requirements (e.g., validation within one year of listing on the Verra registry) may be added at a later date, based on development of the market and feedback from project proponents.
81	NGO	Standard	It should be a clear statement explaining the reason why sorting of recyclable plastic from non-recyclable plastic is considered as a recycling activity, because it does not match the definition of recycling. In addition, it should be clearly stated if RCC will account only the recyclable plastic or all the plastic.		See response to comment #8. Given that recycling projects that purchase material from sorting facilities will be using the Recycling Methodology, they will only be eligible to issue Waste Recycling Credits on the recycled material that they measure at the output stage of the recycling facility. The Recycling Methodology will include a requirement for credits to be issued on the recycled material that is directly measured at the output of the recycling facility.
82	NGO	Standard	An overview or summary of the process could be easier to follow, e.g. a diagram/flowchart including expected timelines and actors involved in every stage.		We understand that the project development process is complex and we will develop a graphic showing the complete project lifecycle, with timelines, to be available on the Verra website.
83	NGO	Standard 2.1.1	As the list is not meant to be exhaustive, other possible categories or materials could be added in the future.		Yes, since the list of examples under the scope of the Program is not exhaustive, materials or examples not listed in Table 1 under Section 2.1 in the *Plastic Standard* v1.0 may be included as long as they fall under one of the defined material categories.
84	NGO	Standard 4.1.10	The batch verification option could be useful. In general, the Plastic Program includes several different timelines that is making a bit complex the understanding of the overall process: Listing period Crediting period Validation period Verification period Monitoring period Rotation of VVB A diagram or flowchart could ease this understanding		Noted. This is helpful feedback regarding the batch verification option. We understand that the project development process is complex and we will develop a graphic showing the complete project lifecycle, with timelines, to be available on the Verra website.
85	NGO	Standard 3.6.4 (2c)	Replace the term "Volume"	Replace with the term "Amount"	Agreed. All instances of 'volume' have been replaced by 'amount' or 'number' depending on the context.
86	NGO	Standard 3.7.1 (1)	Single geodetic coordinate may not be the best approach for riverine plastic interception where the system may have to be moved from time to time to achieve the highest plastic waste yield	Allow for relocation of plastic interception systems within certain boundaries	Section 3.7.1 of the *Plastic Standard* has been revised to include requirements for specifying the project location of activities that include the movement of technology.

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87	NGO	Standard 3.10	Additionality: absence of the incentive provided by the plastic crediting mechanism	Is this requirement necessary? Even if other funding sources are available (eg philanthropists), the crediting mechanism may provide a tool to create a market which is more sustainable	We must ensure that credited activities advance the primary objective of the Program, which is to support and scale-up activities that increase plastic waste recycling and/or recovery from the environment. Specifically, credited activities need to increase the recovery and/or recycling of waste plastic beyond what would have happened without the project. To assess this, crediting baselines must be set at the level that captures (and does not credit) existing plastic waste recovery and/or recycling activities. Otherwise, the resulting credits could not be used for claims associated with real and additional waste reduction and recycling, which is critical if buyers use the credits to mitigate their plastic waste footprint (i.e., using the credits as offsets). It is also important for the Program to promote activities that go beyond business as usual to support the transition to a circular economy.

Further, philanthropic funding does not necessarily prevent projects from demonstrating additionality. Many projects need philanthropic funding to cover start up costs, which would not cause a project to fail the additionality test as outlined in the applicable methodology. |
| 88 | NGO | Standard 4.1.19 | The verification statement shall state the **volume** of plastic waste… | The verification statement shall state the **amount** of plastic waste… | Agreed. All instances of 'volume' have been replaced by 'amount' or 'number' depending on the context. |
| 89 | NGO | Standard 3.11 | The quantification of plastic is a bit confusing because it talks about volume of plastic, but the unit of measure is kilograms | Could be easier to talk about weight / amount all the time. | Agreed. All instances of 'volume' have been replaced by 'amount' or 'number' depending on the context. |
| 90 | NGO | Standard 3.13 | Not sure about the reason of excluding interested stakeholders from the identification. Including all type of stakeholders could help the validation and verification process as it will ensure that not relevant groups were left behind | Include all type of stakeholders as mentioned in page 22, line 22 | "Any known interested stakeholders should also be identified" added to Section 3.13.1. It may not be possible for a project proponent to identify all possible interested stakeholders, and, since interested stakeholders are by definition not materially affected by the project's activities, it is less important that they be involved in project design.

It is required that the griveance redress procedure and full project documentation (Sections 3.13.10 and 3.13.12, respectively) be accessible to interested stakeholders. |
| 91 | NGO | Standard 3.13.14 | How to ensure that the public comment period allows participation of all stakeholders? Some stakeholders might not be able to access the Verra website | Project proponent could be responsible for this, in a similar way as it is stablished in Access to Information | The online public comment period hosted on Verra's website is only one way that stakeholders -- mainly global stakeholders -- can provide input into project validation and verification. As the commenter points out, the online public consultation on its own is not sufficient to understand how all stakeholders experience the project.

It is for this reason that Section 3.13.12 ensures that full and current documentation is accessible to all stakeholders and Section 3.13.13 ensures that stakeholders receive information about an auditor's visit before that visit occurs. It is the project proponent's obligation to facilitate direct communication between the auditor and stakeholders. It is the auditor's responsibility to ensure that project proponents are aware of and address any comments raised by stakeholders either directly or through the established grievance redress procedure. |
| 92 | NGO | Program Guide | Given that the Plastic Program is meant to be global, it should clearly state how its recognition in every country will be ensured. We could assume it is done by using recognized verification/validations bodies, however, better to say it clearly in the program introduction or overview. | | The Plastic Program is a voluntary scheme and therefore does not have to be formally recognized by the country for a project to participate in the Program. However, projects are required to evaluate regulatory surplus. Activities that are mandated by a law or regulation that is enforced are not eligible under the Program. In the future we hope to integrate with EPR schemes and link to national programs. |

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93	NGO	Program Definitions	Not very clear how a transaction in the Plastic Credit market works. These terms could be further explained: issuance – holding/selling/transactions – retirement How will be the pricing defined?		A definition for 'issuance' has been included in the *Plastic Program Definitions* v1.0 and the definition of 'retirement' has been revised based on comment #105. Based on Verra's experience, the value of the credits from projects will be determined by the market demand for projects managing certain types of plastic over others (i.e., credits from projects managing low-value plastic may have a higher value). The price of the credits will be determined by the market and will not be prescribed in any way by the Program. The market will likely result in differentiated pricing based on buyer preferences.
94	NGO	Program Guide	An overview or summary of the process could be easier to follow, i.e. a diagram/flowchart including expected timelines and actors involved in every stage. The consultation periods and dependencies among the different steps to be followed with Verra and with VVBs can be confusing.		We understand that the project development process is complex and we will develop a graphic showing the complete project lifecycle, with timelines, to be available on the Verra website.
95	NGO	Program Guide 3.3	They should be recognized as a valid entity to perform environmental/social audits in the country were the project they will verify is developed (as mentioned in page 13, line 17). Temporary agreements with local assessors or bodies could be also valid, but in any case, the mechanism should be explained in the document.		Noted. This is helpful feedback.
96	NGO	Program Guide 5.5.2	Yes. Vintages as an option, but not mandatory to projects could be helpful for some Plastic Credit buyers.		Noted. This is helpful feedback. Project proponents will not be required to split verification periods into vintages; however, the option will likely be available for those who wish to do so.
97	NGO	Program Guide 4	"Plastic waste removed from the environment **and/or** put into the circular economy" This suggest that plastic is always put into the circular economy, which is not the case	Plastic waste removed from the environment and managed in a way that minimize impacts (properly disposed of), or put into the circular economy…	Good point. We revised Section 4 of the *Program Guide* v1.0 accordingly.
98	NGO	Program Guide 5.1	Six steps. Do you mean the ten steps? Or which ones?	If this refers to six, there should be specified which ones, because the process is listing 10	Section 5.1 of the *Program Guide* has been updated accordingly.
99	NGO	Program Guide 5.8.3	The uniqueness of the project can be reported by the VVB. This could save some time in the process	The Verra registry checks that if there are other projects within a five kilometer radius, the uniqueness was verified by the VVB	The Verra registry automatically notifies Verra staff when a new project is located within a five kilometer radius of another registered project. This step does not add any additional time to the process for the project proponent.
100	NGO	Program Guide 5.8.4	… verification report **volume** and shall specify **volume** … fees are payable on the **volume** of plastic credits which are issued Given that Plastic Credits are issued per kilogram of plastic, the word volume can be confusing	… verification report **amount** and shall specify amount … fees are payable on the **number** of plastic credits which are issued	Agreed. All instances of 'volume' have been replaced by 'amount' or 'number' depending on the context.
101	NGO	Program Guide 5.10.3	… payable on the **volume** of plastic credits which are retired	… payable on the **number** of plastic credits which are retired	Agreed. All instances of 'volume' have been replaced by 'amount' or 'number' depending on the context.
102	NGO	Program Guide 5.3.3	In section 5.3.3 a mechanism to ensure participation of all stakeholders is missing. The Verra public comment function could not be accessible to everyone.	Project proponent should include a mechanism to get and report comments from every relevant stakeholder, especially those that may not have access to the Verra registry. This could also be part of the validation / verification process.	All projects are required to conduct a robust local stakeholder engagement and consultation process, as set out in Section 3.13 of the *Plastic Standard*. This process, and any comments received, must be described and addressed by the project proponent, and are assessed by the validation/verification body.

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103	NGO	Program Definitions Waste	… recycled or recycled	… recovered or recycled	The definition of "waste" has been revised in the *Plastic Program Definitions* v1.0 for increased clarity to indicate that any post-use or post-industrial material that is discarded, rejected, unwanted, surplus or abandoned and is not being recovered for appropriate end-of-life management is considered waste.
104	NGO	Program Definitions Recovery	The definition of this activity should include the condition of a responsible management or disposal of the material.	… recovered or recycled Or remove repeated word … out of the environment… or other sources, and managed in a way that minimize impacts by being recycled or properly disposed of	Verra has replaced the use of the term "recovery" with "collection" in the Plastic Program. The definition of "collection" has been revised to "the logistical process of moving plastic waste from its source to an appropriate destination, per a Plastic Waste Reduction Program methodology". This definition is based on the ISO 472:2013 definition of "collection" with "place where it can be recovered" removed and "to an appropriate destination, per a Plastic Waste Reduction Program methodology" included. The methodologies will include the appropriate sources and end-of-life options for materials collected and recycled by projects certified by the Plastic Standard.
105	NGO	Program Definitions Retirement	What does it mean that a plastic credit is permanently removed from circulation?	Explain what this removal means or the implication of a Plastic Credit removal.	When a Plastic Credit is retired it is permanently removed from circulation by a user to compensate for their generation of plastic waste, which means the Plastic Credit cannot be used by any other entity without the risk of double claiming. The definition of 'retirement' has been revised in the *Plastic Program Definitions* v1.0 for increased clarity.
106	NGO	Program Definitions WRC	WRC is missing in the acronyms	Include Waste Recovery Credit	Waste Recovery Credits have been renamed to Waste Collection Credits. The acronym WCC has been included in the *Plastic Program Definitions* v1.0.
107	NGO	Program Definitions VVB	VVB is missing in the acronyms	Include validation/verification body	The acronym VVB is included in the *Plastic Program Definitions* v1.0
108	Industry	Standard	Why refer to the standard as a "Plastic Waste Reduction" standard if "reduction" projects are not eligible?		Reduction activities are not within the scope of the first version of the *Plastic Waste Reduction Standard*. However, the *Standard* does cover recovery and recycling activities both of which contribute to the **reduction of plastic waste** in the environment.
109	Industry	Standard	For smaller projects, the validation and verification process will likely be too burdensome due to the time needed to complete the process and issuance of credits. It is impossible to claim universally that this is the case, but I would assume that for those projects that rely on credits to subsidize operations, the time period until credit issuance will be difficult.		Noted. This is helpful feedback. We have incorporated elements into the validation/verification requirements that should reduce the burden on smaller projects, including batch audits and requiring a reasonable level of assurance only every three years.
110	Industry	Standard	To what extent does this process make it possible for informal actors to participate as a project proponent (and not merely a stakeholder)? How might barriers to participation be addressed through the program design?		As you point out, it may be more difficult for informal actors to participate as a project proponent particularly as individuals. However, we anticipate groups of informal actors coming together to form a project and serve as project proponent. NGOs often work with groups such as informal actors to help develop projects and provide support throughout the development, validation and verification process. Verra is working to reduce the barriers for informal/community based projects and small-scale projects to the extent possible, including simplifying the additionality test, streamlining the monitoring process and reducing the costs associated with validation and verification.
111	Industry	Standard 4.1.10	Possibly. This may be an appropriate way to deal with multiple projects in the same geographic region (and likely handling the same material.)		Yes, this is the intent of batch audits, in addition to reducing validation/verification costs for projects. Further detail on this process will be provided once the program launches.

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112	Industry	Standard 2.1.2	Conceptually, distinguishing between "recovery" and "recycling" is fine, but in reality, different business models reflect different parts of these processes. How do you define a single project as one or the other?	Allow a project to pursue credit for one or the other, but not both?	The term "collection" has been used to replace the use of "recovery" in the Plastic Program. The methodologies for plastic waste collection and recycling projects will distinguish the types of activities that can use each methodology. Projects that have both collection and recycling activities can use both methodologies and issue both Waste Collection Credits (formerly Waste Recovery Credits) and Waste Recycling Credits if they meet the requirements of the methodologies. The Recycling Methodology will require that the recycling facility is in the project boundary and will limit the issuance of credits to the recycled material measured at the output stage of the recycling facility. This will limit the nature and configuration of projects that can issue Waste Recycling Credits.
113	Industry	Standard 2.13	Why call the program "Plastic Waste Reduction" if reduction of plastic waste is not in scope?		See response to comment #108.
114	Industry	Standard 3.3.4	Baseline methodologies should also be verified, to avoid incentive to intentionally "low ball" baseline in order to generate more additional tons.	In addition to verification, the use of 3rd party data could be encouraged.	Project proponents must establish the crediting baseline for their project using an approved methodology. The crediting baseline must also be reviewed during validation by and independent third party.
115	Industry	Standard 3.3.5	How will baselines reflect recovery and recycling of material that may have been previously issued credit for merely recovering?	Validation and verification accreditors/certifiers would need to be able to share data. Is this use case the intention of the "batch" process?	A project's baseline must be reassessed at crediting period renewal. The validity of the original baseline scenario must be demonstrated, or if the original baseline is no longer valid a new baseline scenario must be determined following Section 3.6.4 of the *Plastic Standard* and the applicable methodology.

The intention of the "batch" process for validation/verification is to reduce the cost and burden on small-scale projects. However, the validation and verification reports will be publicly available and future auditors can and should review previous project documents and verification reports when conducting a verification. |
| 116 | Industry | Standard 3.3.7 | Is this meant to represent where the plastic waste comes from? e.g., A waste shed? Generation is not static. Material can be moved into/out of geodetic areas by vehicle/ human movement, or nature (wind, rain, water current). | | The intention of requirement 3.3.7 is for project proponents to identify the geographic area(s) within which future project activity instances may be developed under a grouped project configuration. The geographic area(s) must be established to ensure that future activity instances are included in the project only if it can be demonstrated that they are subject to the same (or more conservative) baseline scenario and rationale for the demonstration of additionality.

The project boundary (Section 3.8) includes the source and end-of-life scenario of plastic waste recovered or recycled that are relevant to the project and baseline scenarios. The methodologies provide further guidance for establishing the project boundary based on the specific project activity. |
| 117 | Industry | Standard 3.4 | To what extent can informal sector projects participate in this scheme, especially in jurisdictions that do not recognize their work or "ownership"? | Verra could undertake an additional effort to work with support organizations that would help facilitate safe engagement for informal workers | See response to comment #110.

Verra is working to reduce the barriers for informal and small-scale projects by simplifying procedures and reducing the costs associated with project development to the extent possible. While it may be possible to work with support organizations to facilitate engagement with informal workers, we are not able to do so prior to the launch of the first version of the Program in January. We must also determine whether it is appropriate for Verra to do so as the standard setter or if such support would be more effective from an external entity or fund. |

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118	Industry	Standard 3.4.1	How would "proof of ownership" be tracked across multiple projects/activities in the same jurisdiction? In reality, multiple stakeholders can "own" material at different points in the process: from the household consumer, to collector, sorter, reclaimer, processor, and manufacturer!		Ownership in the case of the *Plastic Standard* refers to the right to control and operate the project activities rather than ownership of the material throughout the value chain. There are applicability conditions in the methodologies to help ensure plastic waste is not acquired or sold inappropriately (e.g., exporting waste to another country for management when the waste could be managed in the country of origin). The concept of 'proof of right' is also included in the Plastic Program and is distinct from the concept of 'ownership'. Proof of right is the demonstration of an entity's right to any and all plastic waste recovered and/or recycled by the project during the crediting period or verification period. In order to demonstrate proof of right, the recovery and/or recycling of plastic waste must be verified in accordance with the Plastic Program rules, including the methodologies.
119	Industry	Standard 3.7.1 (b)	A one-time, one-location sampling methodology is not appropriate for a project that will source material from a widely defined waste shed		The project location is not meant to capture all possible sources of waste material being recovered or recycled by the project activity, which is instead included in the project boundary. Rather, the location should identify where the project activity is taking place. For example, if the activity includes sorting of waste plastic at a MRF the location would likely be the site of the MRF. Alternatively, if the activity is informal recovery of recyclable plastic from a landfill the location would likely be the site of the landfill.
120	Industry	Standard 3.12.3	Monitoring Plan: Will the program provide examples of a good monitoring plan, reporting, etc.?		Yes, all approved methodologies will include a list of parameters that must be monitored as well as QA/QC procedures for each parameter. The methodologies also include a section on monitoring plans and provide guidelines for establishing strong monitoring and reporting systems.
121	Industry	Standard 3.13	Likewise, it would be helpful to see examples of good stakeholder engagement practices.		Verra will consider building guidance on best practices for stakeholder engagement as we gather more experiences of projects in this field. We would welcome suggestions of generic stakeholder engagement best practices that we could refer to!
122	Industry	Program Definitions Composite material	Composites definition	The difficulty of collecting or recycling composite materials depends by various items (technology or infrastructure related), hence the definition below should be reworded and corrected.	The definition of "composite material" has been revised to reflect the potential difficulty in managing them based on technology/infrastructure and the definition of "material type" has been included in the *Plastic Program Definitions* v1.0
123	Other	Program Guide 2.4	Italicize the word "Recommendations" in the last paragraph of this section.		Thank you. 'Recommendations' is italicized in the final version of the document.
124	Other	Program Guide 5.5	Yes, buyers may find it helpful to utilize vintage periods, because some prospective Plastic Credit buyers may find some vintages more valuable than others.		Noted. This is helpful feedback. Project proponents will not be required to split verification periods into vintages; however, the option will likely be available for those who wish to do so.
125	Other	Program Guide 5.11	No verification interval requirement is needed.		Noted. This is helpful feedback.

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126	Academia	Program Guide 2.5	why are plastic credits based on mass (kg)	I was wondering why the plastic credits are based on mass (kg) alone, and not some measure of their impact on the environment?. For example a large lightweight structure may be more harmful, than a heavier smaller mass; or the type of plastic as it degrades may be more harmful than a more stable plastic. Perhaps mass (m) times (x) impact (I) is a better measure of a credit.	Verra acknowledges the value of assigning different values to plastics by polymer type to incentivize the recovery of traditionally unrecyclable and/or hard to recover plastics. Future versions of the Program may allow for the number of credits issued for recovered and/or recycled plastic to be weighted based on plastic type using an impact equivalency. However, such a tool will take a significant amount of time and research to develop. Currently the Program accounts for all plastic types in an equal manner. Recovery projects have the option to report on the plastic types if feasible, given the low feasibility of material sorting and identification in certain cases. Recycling projects will be required to identify material managed by the plastic types listed out in the Scope of the Standard. The serial numbers associated with each credit will represent the plastic type(s) managed by the project if the project provides this information. With information on the plastic type(s) managed being reflected in the serial number of the credits, credit buyers will be able to purchase credits from projects that manage plastic types that they are unable to manage in their value chains (a majority of which tends to be low-value plastics). Based on Verra's experience, the value of the credits from projects will be determined by the market demand for projects managing certain types of plastic over others (i.e., credits from projects managing low-value plastic may have a higher value).
127	Industry	Program Guide 4	Permanence	One of the important concepts of carbon neutrality is permanence of removal of emissions. Permanence needs to be a concept in this plastic neutrality framework. It's notably missing from the principles while being mentioned in 2.1. Without permanence, there is no neutralization of emissions, especially if the recovered plastic is put into the same type of product flowing into another region of the world where it can be emitted back into the environment.	Indeed the concept of permanence is important in carbon markets and for carbon neutrality claims. However, with plastic the bigger concern is ensuring the waste is actually recovered and/or recycled for which we have established many monitoring requirements and safeguards. It would be unreasonable, and impossible in most situations, to require projects to track recycled content through its next use and subsequent end-of-life management. Instead, the goal is to scale recovery and recycling operations so that the infrastructure exists to keep material in the circular economy. Section 2.1 of the *Program Guide* has been revised for consistency since this Program does not include the principle of permanence.
128	Service Provider	Program Guide 6.1	Addition of semi formal and formal collection from private sources	White informal collectors and municipal waste collection are both significant groups to work with, it's also semi-formal and formal waste collectors that work in private waste collections in Industrial Areas, Hotel & Tourism Industries, and other activity specific areas like airports, wedding halls, etc.	The Plastic Waste Recovery Methodology will include both formal and informal project actors in the description of eligible project activities. There is no language in the methodology that explicitly excludes projects with semi-formal and formal project actors (waste collectors in this case).
129	Service Provider	Program Guide 4	Simplicity	Keeping the entire process as simple as possible, will allow for more acceptance from the grassroots, the waste collectors, especially in the informal sector. Reducing paperwork where possible, reliance on existing infrastructure (such as low tech phones, weigh scales, whatapp for communication), building of trust over time, reducing steps in the methodology will allow for quick understanding and compliance.	We are working to reduce the burden of project development, particularly for small-scale and community based projects. We are doing so by streamlining the methodological procedures and the registration and issuance process, reducing the cost of validation and verification to the extent possible and encouraging use of existing infrastructure.
130	Service Provider	Program Guide	Registration & Process seem too much for small scale projects.	"Is the plastic project registration and issuance process (Section 5) clear and easy to follow? Are there requirements or steps that might be too burdensome on projects, particularly small-scale projects?" Yes, my personal view is that some of the steps might be too detailed or too much for small scale projects. Perhaps, projects of a certain value/size could follow a simplified or less stepped approach. Or perhaps, when rolled out, small scaled projects are only taken on at a later stage once the feedback and implementation problems are sorted out with the larger sized projects in the first year or two.	Thank you for this feedback. The registration and issuance process requirements have been reviewed and edited to be as clear as possible. In addition, these processes may be updated over time, as we receive feedback from project proponents and users of the documents.

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131	Industry	Program Guide 1	Packaging scope	It would better serve the market demand if the scope of the program would be "packaging" and not "plastic" only.	The scope of the Program includes composite material, which includes packaging made of multiple layers of one or different types of plastic, and materials made of layers of plastic and other materials. Please refer to Table 1 in Section 2.1.1 of the *Plastic Standard* v1.0 to see how packaging is included in the scope of the Program. The Program intends to include the recovery and recycling of plastic that is not used as packaging in the scope as well to ensure the appropriate management of all plastic waste.
132	Industry	Program Guide 2.2	Synergies and accountability of 3RI members and PSDC / PSAWG / 3RI technical advisors.	It would be more valuable if the inputs from the 3RI members and advisory boards (PSDC, PSAWG, technical advisors) would be more often and openly cross-shared.	Inputs from the PSAWG, technical advisors and 3RI Steering Committee (SC) are shared with the PSDC, which is the key standards development committee. 3RI SC members are particularly consulted on issues where the PSDC needs input on corporate perspectives, but all 3RI SC members have access to PSDC documents including background papers, presentations and meeting notes.
133	Industry	Program Guide 3	Sections with missing content.	Why some sections have no content yet?	There is no missing content. Some of the sections appear empty in Collaborase since these are the section headers and not meant to be followed by content in the same section. Please refer to the PDF versions of the documents on the Verra website to see the format in which the documents will be published.
134	Industry	Program Guide 3.2	Methodology element developers entity.	Who are the assigned developers for the methodology?	The initial methodologies are being developed by rePurpose and South Pole alongside Verra. New methodologies can be developed following the launch of the Program by interested and qualified entities that submit a proposal for a new or revised methodology that fills an existing gap.
135	Industry	Program Guide 4	Additionality limitation for recovery and recycling markets.	Additionality is applicable and needed in the carbon market. Differently, in the recovery and recycling market it adds up complexity and widely limit the application of project proponents.	We must ensure that credited activities advance the primary objective of the Program, which is to support and scale-up activities that increase plastic waste recycling and/or recovery from the environment. Specifically, credited activities need to increase the recovery and/or recycling of waste plastic beyond what would have happened without the project. To assess this, crediting baselines must be set at the level that captures (and does not credit) existing plastic waste recovery and/or recycling activities. Otherwise, the resulting credits could not be used for claims associated with real and additional waste reduction and recycling, which is critical if buyers use the credits to mitigate their plastic waste footprint (i.e., using the credits as offsets). It is also important for the Program to promote activities that go beyond business as usual to support the transition to a circular economy. We are working to minimize the burden the Program requirements place on projects throughout the project development and implementation process, particularly for small-scale and community based projects, including by streamlining procedures and minimizing the cost of validation and verification.
136	Industry	Program Guide 5.6	Complexity of registration and verification for small - medium size projects.	The registration and verification steps as described in the standard highly limit the access for small and medium size project proponents that can't afford the costs and manage alone the complexity of the process.	Thank you for this feedback. The registration and issuance process requirements have been reviewed and edited to be as clear as possible. In addition, these processes may be updated over time, as we receive feedback from project proponents and users of the documents.
137	Industry	Program Guide 6.4	Plastic Program Fee Schedule to be developed.	It's hard to share comments based on docs to be still developed. All docs should be available in consultation phase, we faced same problem in the first external review.	The Fee Schedule is still under development and will be made publicly available at the launch of the *Plastic Standard*. The two main fees charged by the Plastic Program are a one-time, per project registration fee and a per-Plastic Credit issuance levy.

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138	Industry	Program Guide 2.5	Require material types recovered	Problematic that you would not require some identification of the material that is recovered. Need to, at least, identify plastic/non-plastic.	Plastic waste recovery projects will have the option to report on material recovered by material type. An easier classification of material is provided for recovery projects to use in Section 3.11.3 of the *Plastic Standard* v1.0. Recovery projects are not required to identify materials recovered by type to avoid being burdensome and creating a high bar for entry for small-scale projects that would need to invest in specific training to begin identifying materials by type. The validation/verification body will check to ensure that Waste Collection Credits are not issued on materials that are not listed in the scope of the Program.
139	Industry	Program Guide 3.3	Other relevant expertise	Other relevant expertise: Plastics industry expertise, mass balance accounting techniques, responsible supply chains, human rights/labor compliance, local market and policy/regulatory knowledge or expertise	Noted. This is helpful feedback.
140	Industry	Program Guide 4	Unique	The reality of "recycling" processes is such that multiple actors are involved in carrying out this part of the process. Does the claim of a credit once upstream disincentivize or disallow material from getting further processed (as in the case with certain advanced recycling processes, in which material must be flaked or pelletized prior to depolymerization or solvent-based purification) and actually returned to a manufactured product or package?	In the case described here, both the mechanical process needed as a prerequisite to advanced recycling and the advanced recycling process will not be able to issue Waste Recycling Credits on the same material. This principle of "unique" will ensure that only one iteration of recycling of a unit of material is creditable.

If the mechanical processor is issuing credits, they will have to show that the end of life of the processed material is advanced recycling, and should the market see this end-of-life management favorably, the price of these credits will increase and advanced recycling will be incentivized. The advanced recyclers are also as capable of issuing Waste Recycling Credits and can work with the mechanical processors to determine credit allocation on a unit of material.

If the advanced recycler is issuing credits, they would have to include the source of the input materials in the project boundary. Should they be buying recycled material from a mechanical processor that is a Plastic Program project and is issuing credits on the material, they will not be eligible to issue credits on the same material. The same logic would apply vice versa if the mechanical processor is selling material to an advanced recycler that is already issue credits on the material. |
| 141 | Industry | Program Guide 4 | Additionality in different regulatory environments | How will additionality be addressed in jurisdictions where policies may require that material is recovered, but the reality is that the policies are not / inadequately enforced? | The *Plastic Standard* requires projects demonstrate 'regulatory surplus' or that the project is not mandated by any law, statute or other regulatory framework **or that the existing laws, statutes or regulatory frameworks are not enforced**. Regulatory surplus must be reassessed at a project's crediting period renewal to ensure changes to the baseline scenario or regulatory surplus are taken into account throughout the project's lifetime. |

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142	Industry	Program Guide 5.3	Stakeholder participation	Although the standard outlines a stakeholder engagement process during the development of a project, the program should contemplate the use of stakeholder endorsements or statements of support. Further, it is important to only qualify projects that treat informal or semi-formal actors in the supply chain or workforce ethically and equitably. How will the standard and program verify the ethical and equitable treatment of informal workers? How might the public comment period be made accessible to stakeholders such as these informal workers who have many barriers to participating in such a process?	Stakeholder endorsements and/or statements of support would be valuable inclusions in project documentation (which will be publicly available on the Verra registry). The Standard requires that impacted stakeholders receive timely information about a validation/verification body's site visit before that visit occurs, and that the project proponent facilitate direct and independent communication between stakeholders or their representatives and the assessor (Section 3.13.12 of v0.2).

The safeguards apply equally to informal waste workers as anyone else, as noted in the addition (noted here in red) to the 3.14 concept "Project activities should not negatively impact the natural environment or local communities, including informal waste workers where relevant." Especially relevant to the commenter's question are the labor requirements in Section 3.14.5, which include a provision for the absence of legally recognized employment contracts, and Section 2.14.8, which requires that "income-generating activities are maximized and economic growth is prioritized to the extent possible for the most vulnerable workers."

These requirements are enforced through third-party audits and, as part of site visits by auditors, unrestricted access to all project stakeholders.

Please see comment #91 regarding stakeholder engagement in the public comment period and consultation process. |
143	Industry	Program Guide 5.1	How "real" is retirement of a credit?	Does the retirement of a credit relate to actual material recovered/no longer recovered?	A Plastic Credit represents the achievement of recovered or recycled plastic waste in the amount of one kilogram. When a Plastic Credit is issued it means an auditor has verified that the plastic waste was recovered or recycled in accordance with the Plastic Program rules. When a Plastic Credit is retired, it is permanently removed from circulation in the Verra registry by a user to compensate for their generation and/or improper management of plastic waste. Retirement of a Plastic Credit precludes any further transaction of the credit and ensures only one entity can use that credit to compensate for their plastic use or management.
144	Industry	Program Guide 7	Equitable access to complaints	How does the registry ensure equitable access to the complaint process? Consider ability of more vulnerable stakeholders to submit enquiries.	See the response to comment #91
145	Other	Standard 2.1	No, there are no other material categories, material sub-categories and/or examples that should be explicitly included in the scope or excluded from it.		Thank you for your response. It is duly noted.

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146	NGO	Standard 3.14	Safeguards need further strengthening	I'm very encouraged to see the expansion of the safeguards section from the previous version, but some issues remain. In general, monitoring an issue and / or "striving" to resolve it is not sufficient to mitigate the issue, or the reputational risk a credit associated with it will carry. Specifically, under Condition of Natural Resources, this applied to: - adequate water treatment and management of effluents - ghg emissions - instead of monitoring and ensuring "minimal" increase, this should be judged in relation to avoided emissions from displaced virgin plastic production. - A "regionally prevailing industry wage" should be replaced with a requirement to provide a living wage.	It would be too burdensome and create a high barrier to entry to require that projects have no negative environmental and social impacts. The intention of the language used in the safeguard requirements is for projects to reduce environmental and social impacts to the extent reasonably possible. Section 3.14.14(2) on water quality requirements has been revised in the *Plastic Standard* v1.0 to increase specificity by requiring that water from projects meet regional or national water quality standards before being released into the environment. Based on Verra's experience with pilot projects and knowledge of data available regarding GHG emission reductions from project activities, it would be overly burdensome for many projects to quantify their reduction in GHG emissions compared to emissions from the production of virgin plastic of similar type and quantity. However, we can consider including this requirement in future versions of the Program once we have a better idea of the data and resources available to projects. At this point, projects are required to demonstrate their GHG emission sources at baseline and during the project activity for the VVB to confirm that the project has attempted to have little to no increase in GHG emissions from the implementation of project activity. The regionally prevailing industry wage was determined by speaking to representatives from Social Accountability International, an NGO focused on advancing human rights at work, who confirmed that living wage is likely to be higher than minimum wage in certain cases. In many instances the minimum wage is likely to be high enough to make the project financially infeasible, making a living wage that much more burdensome. "Regionally prevailing industry wage while striving towards living wage" ensures that projects have incentive to use the Plastic Program and project actors are paid at least as much as those in the region performing similar activities.
147	NGO	Standard/ Program Guide	Guidance for claims needs to be established and included	Guidance on allowable and credible claims is necessary and should accompany the standard. A serious risk of such a crediting system is green washing, and clear requirements for claims is critical to ensure that such a program ultimately supports progress toward eliminating plastic pollution.	We reviewed claims procedures for ISEAL-compliant sustainability standards, including the Roundtable on Sustainable Biofuels and Forest Stewardship Council, and added Section 8, Communications and Claims, to the document. We are also working with the 3RI and other partners on the *Guidelines for Leadership in Corporate Plastic Accounting,* which addresses how Plastic Credits can be used -- together with corporate actions in the value chain -- to achieve credible claims. We expect this document to be published in early 2021.
148	NGO	Program Guide	Concern RE double counting of WRCs and RCCs for the same material	Noting this text: "Projects may be issued both WRCs and RCCs for the same material where both the recovery and recycling of the material is achieved by the project." I understand the logic in keeping collection credits and recycling credits separate, but have concerns around how this will be communicated once these credits are purchased.	The methodologies will ensure that only recovery activities can issue Waste Recovery Credits (now referred to as Waste Collection Credits) and recycling activities can issue Waste Recycling Credits. Credit buyers will also have access to a project's project description to obtain further details on the project activities that the credits were issued from.

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149	NGO	Standard 3.13	Inclusion of informal waste workers	The only place informal waste workers are specifically mentioned within the Standard is when they are identified in Box 1 as a potential stakeholder group. This is not sufficient. There is a danger that waste pickers will be excluded, ignored or harmed when any formalised waste management projects are introduced, unless they are explicitly and intentionally considered, consulted and integrated within the project. This needs to be reflected within the Standard. We suggest an additional paragraph is added to s3.13 that speaks specifically to the need to engage with and integrate existing informal waste workers (where the IWS exists) into projects, to ensure that projects don't impact negatively on this sector but rather promote waste pickers' livelihoods and human rights. Also, S3.13.1 - we suggest adding 'particularly highlighting the role of the informal sector' to the end of this sentence.	An addition (noted here in bold) to Section 3.13.1 calls out informal waste workers: "3.13.1 The project proponent shall use locally appropriate methods to identify all stakeholder groups who could potentially be affected by the project, **with special attention given to identification of marginalized or vulnerable groups such as informal waste workers.**" An addition (noted here in red) to the Concept Section of 3.14, Safeguards, calls out informal waste workers: "Project activities should not negatively impact the natural environment or local communities, **including informal waste workers where relevant.**" An addition Section 3.14.8 calls out the elimination of existing income-generating activities for informal waste workers, requiring those to be compensated for by "the creation of alternative activities that generate the same or increased income and require similar knowledge, skills and working hours" ("and working hours" added subsequent to the v0.1).
150	NGO	Standard 3.13.5	Reword	Expecting vulnerable groups to self-identify may be problematic for many reasons! It may be more effective to work with local community groups and NGOs to identify those must vulnerable as necessary.	Project proponents should work with, as necessary, local community groups, NGOs or other organizations to identify directly affected or interested stakeholders was added to Section 3.13.1. This sentence was added at the section on stakeholder identification so that it would carry through any instance where project stakeholders are referred to in the Plastic Program.
151	NGO	Standard 3.14	3.14 Concept - Waste pickers are not explicitly included	There is a danger that waste pickers will be excluded, ignored or harmed when any formalised waste management projects are introduced, unless they are explicitly and intentionally considered, consulted and integrated into the project. Waste pickers need to be named in this section alongside local communities and the natural environment as a stakeholder group who should not be negatively impacted (or indeed, as per comment below, who should intentionally be positively impacted by the project). 'Project activities should not negatively impact the natural environment or local communities.' Add: 'or the informal waste sector' to this sentence.	The Concept of Section 3.14 in the *Plastic Standard* v1.0 has been updated to read "Project activities should not negatively impact the natural environment or local communities, **including informal waste workers where relevant.**" See response to comment #149

Comment #	Commenter Organization Type	Comment Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
152	NGO	Standard 3.14	The standard should require projects to have positive social and environmental impacts	S3.14 - Safeguards - In only addressing negative impacts, and not requiring positive impacts, this initiative misses a huge opportunity for waste management projects to positively impact people and the environment. We would advocate changing this language and emphasis from 'project activities should not negatively impact ...', to 'project activities must bring positive impacts to the natural environment, local communities and the informal waste sector'. In your response to our comments on V1 you explained this was to accommodate small-scale projects, but we would argue that appropriate standards could be developed for small-scale projects that would not unfairly burden them, but would ensure that even small-scale projects are able to bring positive benefits. There is precedent for adapted ethical standards for small-scale ventures in many global initiatives/standards. **To include the requirement for positive impacts (with adapted standards for small-scale projects) would position this initiative to lead on developing best practice in waste management initiatives that impact positively on people's health, livelihoods and human rights, and on the environment. To neglect this is a huge missed opportunity.**	We recognize the need to ensure that informal waste workers are provided with safe and healthy working conditions, fair remuneration and opportunities to improve their work and lives. The safeguard requirements in Section 3.14 of the *Plastic Standard* v1.0 will ensure that any negative social and environmental impacts on project actors are either identified and mitigated or eliminated, depending on the nature of the impact. While meeting the level of 'do no harm' required by the *Plastic Standard* v1.0 will certainly result in improvement of conditions for marginalized and vulnerable groups, it is beyond the scope of v1.0 to require benefits to any particular group. Changing the-requirements to require positive social and environmental impacts would make the barrier to entry for projects too high-for small-scale projects operating in challenging environments. Our priorities in v1.0 are to ensure that the cost of project development, auditing and using the Standard is achievable for any project that does no harm. In the future, the requirements can be made more stringent based on project experience and increased availability of data to help us classify projects on the basis of scale. In the future Verra will consider creating guidance or a module for waste picker/informal sector projects. We will take the commenter's suggestions on ensuring income security, collectivization of informal waste workers, provision of training and skill-development opportunities and access to additional sources of financing in the development of the module.
153	NGO	Standard 3.14	Safeguards need expanding	3.14 - this section is extremely important in determining the impact of the projects on waste pickers. At the moment, the social safeguards are limited to workplace safety, wages, and forced and child labour. While these are of course very important, there are other important factors that should also be included. An important step is safeguarding waste pickers is supporting their organisation, for example into cooperatives, associations or member based organisations. This can lead to the collective ability to access resources and services and influence decision-making processes. There should be a requirement that projects - where applicable - support waste pickers to organise in this way. Another area is around training and upskilling (beyond workplace safety) eg providing opportunity for access to education and skills development; and growing the entrepreneurial potential, creativity, dynamism, skills and innovative capacities of informal waste workers. A further step in integrating waste pickers would be to provide access to finance, particularly tackling barriers faced by women and marginalised groups, to facilitate their movement up the waste value chain.	See response to comment #152
154	NGO	Standard 3.14	Income security	Income security is extremely important when working with waste pickers, and should be a factor in addition to wage amounts. We suggest adding: "Providing income security for informal waste workers, by guaranteeing stable prices for plastic through (for example) price floor mechanisms, and paying waste workers for the service that they provide as well as the plastic that they collect."	See response to comment #152

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155	NGO	Standard 3.14.5	Safeguard on withholding wages	Para 3 delete 'unless permitted by relevant laws' as wages should not be withheld as a means of disciplinary action anywhere.	Section 3.14.5 in the *Plastic Standard* v1.0 has been revised per your suggestion.
156	Industry	Standard 2.1	Plastics and composite materials don't qualify the full packaging mismanaged in the environment.	Among the list of plastic types there are various that will be soon removed from the market (PVC, PS, etc) and for which the additionality principle clashes. The category of composite is a big mix of flexible and paper-based packaging types, to be cleaned and clarified.	The scope of this Program is plastic waste and waste composite materials containing plastic. The Program does not currently include packaging material that does not contain plastic. The Program intends to drive finance towards any additional recovery or recycling of plastic waste, as long as the material falls in the scope of the Program and the project meets the requirements of the Program.
157	Other	Standard 2.1	Materials	Additional materials/examples of materials to explicitly mention include: Fishing crates, diapers and face masks, although the text mentions that the list is not exhaustive	We have noted that you are aware that the list of materials eligible under the Program in Section 2.1 of the *Plastic Standard* v1.0 is not exhaustive. Fishing crates have been added under "HDPE injection" and diapers have been added under "non-packaging composite materials (with visible plastic)" in Table 1 of Section 2.1 of the *Plastic Standard*.
158	Other	Standard 2.1.2	2.12 - lines 7 to 10	Lines 7 to 10: "Plastic waste sorting can be considered a recovery or a recycling activity depending on whether it is implemented to sort plastic waste from non-plastic waste (i.e., recovery) or to sort recyclable plastic waste from non-recyclable plastic waste (i.e., recycling)" It would seem to be more appropriate to consider all sorting activities as recovery Is there any consideration given to the quality of the material recovered?	See response to comment #8. Quality of the material recovered is currently not a consideration under the Program as long as the material is accepted by an eligible end-of-life option to avoid being burdensome on small-scale projects that might not be able to meet the quality requirements.
159	Other	Standard 3.11	Amount vs. volume	It could become confusing to use volume both for measurement of amount of waste and amount of credits. Recommend changing to read "Plastic waste recovered and/or recycled by projects is the basis for the amount of Plastic Credits that can be issued."	Agreed. All instances of 'volume' have been replaced by 'amount' or 'number' depending on the context.
160	Other	Standard 3.12	Third party monitoring	Recommend indicating if the monitoring could be carried out by the project implementer or if a third party monitoring system is permitted – any restrictions around this to ensure that the third party likewise adheres to the guidelines?	Methodologies provide guidance and requirements for the quantification of recovered and/or recycled plastic, including data and parameters that must be monitored. As long as projects meet the monitoring requirements in the methodology and Plastic Program rules, and a third-party auditor assesses that it is accurate, the project will have flexibility to determine how and by whom monitoring takes place.
161	Other	Standard 3.13	New stakeholders	What steps shall be taken to identify if any new new stakeholders have emerged during the course of the project? How should they be incorporated?	Section 3.13.2 states that "Stakeholder groups shall be... updated as necessary in monitoring reports." It is up to the project proponent to determine how best to incorporate any new stakeholder group, and the auditor to hold them accountable for new stakeholder groups' identification and (as appropriate) incorporation.
162	Other	Standard 3.14	Gender	Incorporating gender considerations in this section is strongly encouraged	Section 3.13.9 in the *Plastic Standard* v1.0 has been revised to explicitly include gender considerations. Section 3.14.8 will also encourage gender considerations in the design and implementation of the project, should women be vulnerable workers in the project. The safeguard requirements (Section 3.14) in the *Plastic Standard* v1.0 are designed to ensure that no harm is done to women and the stakeholder engagement section (Section 3.13) ensures that there will be no discrimination among and/or towards project actors.

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163	Service Provider	Standard 2.1.1	It would be worth considering the (explicit) inclusion of hygienic products, such as diapers and sanitary pads, in the material scope. They contain plastic and can cause significant environmental damage, however they are not listed in the table below. Without such an inclusion, no funding may go towards the collection of these products, perpetuating the challenges associated with these product groups. LLDPE is not included in the list of plastics. Best to put LDPE and LLDPE in the same category. In the categories, "closures" or lids are not mentioned, could be in "other rigid" to avoid confusion. Also it may be useful to confirm that containers with closures or labels made from a different material are not classed as composites.		Diapers have been included under "non-packaging composite materials (with visible plastic)" and caps/closures/lids have been included under "other rigid PP" in Table 1 in Section 2.1 of the *Plastic Standard* v1.0. Since Section 2.1.1 (1) of the *Plastic Standard* v1.0 includes all materials made of the seven types of plastic in the scope and is not limiting to materials explicitly mentioned (e.g., LLDPE is a type of LDPE), similar polymers (especially visible and chemical similarity) can be accounted for in the same manner and do not need to be explicitly mentioned to be eligible under the Program. Section 2.1.1 (2a) has been included to emphasize that containers with closures or labels made from a different material than the container are not considered to be composite materials.
164	Service Provider	Standard 2.1.2 (1)	" Plastic waste sorting can be considered a recovery or a recycling activity depending on whether it is implemented to sort plastic waste from non-plastic waste (i.e., recovery) or to sort recyclable plastic waste from non-recyclable plastic waste (i.e., recycling)." In the case of household collection, the waste is often not sorted and includes organic and non-organic components. This waste is initially sorted in non-organic and then further sorted into sellable plastic categories, that are then baled and sold to junk shops or aggregators depending on material type. Does such a continuous recycling process quality for both recovery and recycling credits for the same material? The definition of chemical recycling, it isn't clear whether this would include recycling to fuels or not. The definition of mechanical recycling, it isn't clear whether this would include recycling into roads or concrete or even RDF could possibly qualify as "raw material".		The methodologies for plastic waste collection will ensure that a project will be able to issue credits on material within the scope of the Program that is sorted out from collected waste. The methodology for plastic waste recycling will ensure that Waste Recycling Credits can only be issued on recycled material weighed at the output of a recycling facility. In the continuous recycling process described, the methodologies will ensure that Waste Collection Credits (formerly called Waste Recovery Credits) can only be issued on eligible material that is sorted out for better end-of-life management than baseline (further described in the methodology) and that Waste Recycling Credits can only be issued on eligible material that is recycled. The definition of chemical recycling has been revised in the *Plastic Program Definitions* v1.0 to highlight that chemical recycling includes recycling to fuels. The methodology for plastic waste recycling will not allow projects that use waste plastic material for applications that have a high risk of leaking into the environment to be eligible to issue Waste Recycling Credits. This will include the use of plastic waste for road construction and to make concrete. The methodology for plastic waste collection will allow the use of RDF as a raw material and/or source of energy for incineration with energy recovery (co-processing) to replace the use of natural mineral resources and fossil fuel in industrial processes.
165	Service Provider	Standard 3.3.3	Could this result in cases where only one (of multiple) instances of a project activity results in additionality, e.g. if they are in (sufficiently) separated locations?		No, the baseline determination and additionality demonstration for all project activity instances of the same project activity must be combined and each activity instance must have the same combined baseline scenario.
166	Service Provider	Standard 3.5.2	This would allow projects that have started to complete validation by 2023? Potentially change phrasing to "a project shall complete validation within two years"?		Projects with a start date of 1 January 2022 must complete validation within two years of the start date. However, projects that start prior to the Program's launch or within the Program's first year have until 31 December 2023 to validate which gives them the necessary time to learn about the Program and prepare for validation.

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167	Service Provider	Standard 3.5.3 (Figure 1)	Blue bracket (12/2023) does not match the arrow (12/2021)		The dates in the arrow represent start date years. The blue bracket is meant to indicate the start dates that require project validation by 31 December 2023. Projects with a start date between 1 January 2016 and 31 December 2021 must validate by 31 December 2023. We will try to improve the clarity of the figure in the design process prior to publication.
168	Service Provider	Standard 3.6.1	How is the crediting period determined, is it the choice of the project proponent to credit for 7 years (+ 2 extensions) or 10 years once?		Yes, the project proponent can choose between the two crediting period options.
169	Service Provider	Standard 3.6.4	A full reassessment of additionality is not required when renewing the project crediting period. However, regulatory surplus shall be demonstrated in accordance with the requirements set out in the Plastic Program rules and the project description shall be updated accordingly		Correct. The validity of the baseline scenario must also be demonstrated, or a new baseline scenario must be determined where the original is invalid at the time of crediting period renewal.
170	Service Provider	Standard 3.6.4 (2)	What determines the validity of the initial baseline? Who assesses the validity of the original baseline? Verra or the external assessor?		A project's baseline must be determined by the project proponent in accordance with the procedure provided in the approved applicable methodology and assessed by an independent third party during validation and at crediting period renewal.
171	Service Provider	Standard 3.14	"Project activities should not negatively impact the natural environment or local communities. Project proponents shall identify and address any negative social and environmental impacts of project activities" This description does not mention that the proponent shall, in addition to the identifying and addressing of the issue, also document and communicate any negative impacts or the management thereof.		While not explicitly mentioned in the *Plastic Standard* v1.0, the project proponent will be given instructions to document any negative environmental and social impacts and the measures taken to mitigate them in the Project Description Template v1.0 that project proponents are required to fill out (per Section 3.2.1 of the Standard) to register their projects.
172	Service Provider	Standard 3.13.5	This seems overly burdensome and an overreach of Verra requirements. Larger programs have many thousands of stakeholders, and dozens of stakeholder groups. A public consultation on 3ri credits provides little benefit and a great deal additional admin.	A compromise would be to include a list of past focus group discussions, household surveys, public meetings, etc., on setting up the waste/recycling system rather than requiring new ones just for 3ri verification requirements.	The intention of this requirement is as proposed in the commenter's suggestion. The text of 3.13.5 has been revised to read "Effective consultation... shall be used to enable project stakeholders... to influence the design and implementation of the collection and/or recycling activities organized by the project proponent."
173	Service Provider	Standard 3.13.14	Will the comments be made public?		All comments are posted publicly on the project record in the Verra registry, per Section 3.13.16.
174	Service Provider	Standard 3.14.8	This cannot be guaranteed as waste system margins are very thin and the capacity to carry non-essential workers is limited.		Section 3.14.8 of the *Plastic Standard* v1.0 has been revised to make this requirement less burdensome and more reasonable.
175	Service Provider	Standard 3.14.10	How can this realistically be demonstrated, especially in often-remote locations in developing countries?		To make this easier to demonstrate, Section 3.14.10 of the *Plastic Standard* v1.0 has been revised to indicate that the project proponent can demonstrate that all technologies used in the project activity have similar or greater energy efficiencies than equivalent technologies used in the region using primary data and/or secondary literature.
176	Service Provider	Standard 3.14.11	Verra would need to provide projects the tools/models to calculate GHG as this is not straight forward for most projects and actors.		Project proponents are not required to calculate their increase in GHG emissions as a result of project activities. To meet this requirement (Section 3.14.11 in the *Plastic Standard* v1.0), it will suffice if the project proponent can identify and provide a few details on the sources of GHG emissions at baseline and as a result of the project activity. This will help the VVB ensure that the project proponent has taken all reasonable measures to ensure little to no increase in GHG emissions as a result of the project activity.

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177	Service Provider	Standard 3.15	Do deviations from the methodologies have to be (pre-) authorized by a 3rd party (e.g. Verra or an independent assessor) prior to monitoring or measurements, similar to clause 3.16.3 in the description of the project deviations?		No, methodology deviations will be reviewed by an independent auditor at validation and/or verification and do not need to be approved by Verra or an auditor prior to the validation or verification process. The consequences of deviations must be reported in the validation or verification report, as applicable, and all subsequent verification reports.
178	Service Provider	Standard 4.1.21	"Question: Could a three-year VVB rotation requirement increase costs of projects and/or auditors?" This depends on the supply and demand of project auditors, which is too early to know.		Noted. This is helpful feedback.
179	Service Provider	Program Guide 2.1	"Create trusted and fungible credits, Waste Recovery Credits and Recycling Credits (Plastic Credits), that represent the impact of plastic waste recovery and recycling activities" Credits represent the outcomes of the waste collection and recycling activities, impact often includes the social, economic, and environmental dimensions of such activities, e.g. job creation, reduced pollution, etc.		Correct, Plastic Credits represent one tonne of plastic waste that was either recovered or recycled as a result of the project activity. Plastic Credits may also be seen as representative of the social, economic and environmental dimensions of the project activities. However, those dimensions are not the same across all projects and cannot be measured in the same way that recovered and recycled plastic waste can be measured. Therefore, the definition of Plastic Credits does not include such dimensions.
180	Service Provider	Program Guide 2.5	"Each Plastic Credit represents an increase of one kilogram of recovered or recycled plastic waste achieved by a project" Does it represent an 'increase' of one kg recovered or recycled or just one kg of recovered and/or recycled material? If this phrasing aims to address the issue of additionality, an option could be to rephrase to "each credit represents one kilogram of plastic that otherwise would not have been recovered or recycled" For Waste Recovery Credits, there is no requirement to specify the type of material (it is recommended). My suggestion is to at least require a differentiation between soft plastics (films) and hard plastics (rigids). This is a practical and meaningful distinction.		The phrasing in Section 2.5 of the *Program Guide* is meant to address additionality. It has been revised based on this suggestion. Regarding the quantification of recovered plastic by plastic type, please see our response to comment #182.
181	Service Provider	Program Guide 3.1	"The project proponent is the default owner of the plastic removed from the environment and/or put into the circular economy by the project and the resulting Plastic Credits unless proof of right is provided to demonstrate otherwise." If a project has more than one proponent and a proof of rights would be provided, would each individual actor receive (their relative share of) the credits directly from Verra?		Each project is attached to a single registry account and all credits issued to the project reside in that account. After issuance, credits can be transferred to other accounts in accordance with contractual agreements or otherwise. With respect to distributing credits to individual project actors (e.g., individual waste pickers), it is up to the project proponent(s) to determine how best to do so. It is more likely that revenues (in the form of wages, equipment, health care, etc.) from the sale of credits would be distributed to the individual project actors than the credits themselves.

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182	Service Provider	Program Guide 4	"Each Plastic Credit must be unique and must only be associated with a single recovery or recycling activity. Where a unit of recovered plastic waste is also recycled, a WRC and an RCC can be issued for the same unit of plastic waste. There must be no double counting, or double claiming of the environmental benefit, in respect of the recovered and/or recycled plastic waste." Each credit must be associated with a unit of material that is recovered or recycled rather than a single activity? For Waste Recovery Credits, there is no requirement to specify the type of material (it is recommended). My suggestion is to at least require a differentiation between soft plastics (films) and hard plastics (rigids). This is a practical and meaningful distinction. The issue of credit ownership needs clearer explanation. The document states that "project proponents establish and operate projects" and also expects to see "evidence of project ownership" and also says that "project proponent is the default owner of the plastic and the credits". In some cases the government owns the waste even when it is traded by others so this adds complexity. I think that in practical terms, the ownership of credits should be decoupled from the ownership of plastic waste. But the owner of the plastic waste (often government) is a key stakeholder that must agree to the granting of credits to the proponent.		Correct, Plastic Credits represent one tonne of plastic waste that was either recovered or recycled as a result of the project activity. We acknowledge that there may be a benefit to projects to quantify recovered plastic waste by material type and want to encourage them to do so. We will continue to make the quantification of recovered plastic waste by plastic type optional. However, we are allowing recovered plastic waste to be quantified by broader categories (i.e., rigid, flexible or composite materials) to reduce the burden on projects of quantifying the recovered plastic by polymer. With respect to your comment on ownership, please see our response to comment #118.
183	Service Provider	Program Guide 5.1 (Diagram 2)	Ten steps before credits can be issued and payment made seems overly burdensome, especially for smaller project? How long does this process take and what are associated costs? It is not clear what happens with the monitoring report after submitted to both Verra and the verification body.		Thank you for this feedback. The registration and issuance process requirements have been reviewed and edited to be as clear as possible, to ensure ease of use for smaller projects, in particular. In addition, these processes may be updated over time, as we receive feedback from project proponents and users of the documents. A revised version of Diagram 2 will be included in Version 1 of the *Program Guide*. A more detailed diagram depicting the project lifecycle, including timelines and costs, will be available on the Verra website in early 2021.
184	Service Provider	Program Guide 5.3.2 (2) and 5.3.3	What is the frequency of the monitoring process? Are these comments private or public?		The methodology applied by the project may dictate or recommend monitoring frequency. Comments received during the 30-day public comment period must be addressed by the project proponent. The third-party auditor assesses the comments and whether they were adequately addressed by the project proponent. The comments received, and how they were addressed, are summarized in a dedicated section in the project description or monitoring report.
185	Service Provider	Program Guide 5.4	To start the validated/verified process, projects are required to complete a 30-day public consultation period, which requires projects to be listed on the Verra registry. Thus, any project that is to be validated or verified, is, by definition, listed on the registry?		Yes, that is correct. In order to begin the validation process, projects must be listed on the Verra registry and undergo a 30-day public comment period. In order to begin the verification process, projects must undergo another 30-day public comment period, which allows stakeholders to comment on the implementation and monitoring of the project.

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186	Service Provider	Program Guide 5.8.3	Each proponent will have exclusivity within 5km radius of their project? According to this description, it would be impossible to have two distinct project proponents, one focusing on collection and the other on recycling?		No, it is certainly possible for more than one distinct project to operate within a 5 kilometer radius. These distinct projects could be operated by the same project proponent, or different project proponents. The Verra registry system automatically checks the geodetic coordinates of new projects against registered projects, and generates a notification when two or more projects are located within a 5 kilometer radius. Verra staff then confirm the new project is unique before approving the project for registration.
187	NGO	Standard 3.14	Safeguard on non-discrimination	There should be an additional safeguard around non-discrimination eg: Ensuring that there is no discrimination in contracting, payment, compensation, access to recyclable materials or access to training based on gender, race, caste, national origin, religion, age, disability, marital status, sexual orientation, cooperative membership or political affiliation;	Section 3.13.9 on anti-discrimination in the *Plastic Standard* v1.0 has been per your suggestion.