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Verra's submission in advance of the Second Informal In-Person Meeting of Heads of Delegation to the INC

Organization	Verra
Status	UNEP accredited observer organization
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Overall approach

Verra welcomes the opportunity to provide written views on the guiding questions issued by the Chair on 9 September 2026. We understand the purpose of this meeting to be to identify areas of convergence and practical landing zones to inform the next Aid to Negotiations. We therefore focus on recommendations grounded in our experience with impact accounting, measurement, verification, implementation, and innovative financing mechanisms.

Verra is a mission-driven non-profit standard-setting organization. We develop and manage the Plastic Waste Reduction Standard Program (Plastic Program), an internationally recognized certification program for plastic waste management activities. It is underpinned by a globally applicable monitoring, reporting and verification (MRV) framework, third-party auditing system, and public registry. The program certifies two distinct outcome types — plastic waste collection, and plastic recycling that displaces virgin material — and is used by projects in more than 20 countries representing a broad spectrum of economic, social and political contexts. We focus on questions where our experience with impact accounting, measurement, verification, implementation and innovative financing can provide practical insight. We do not address questions outside this technical and operational scope.

Cluster A - National plans; reporting; implementation and compliance; information exchange; effectiveness evaluation

1. What purposes are National Plans expected to serve as a contribution to the achievement of the objectives of the instrument?

Based on our experience implementing MRV systems across diverse contexts, National Plans should translate the instrument into nationally appropriate priorities, measures and responsibilities; identify finance, capacity-building and technology needs; and provide the basis for reporting and

assessing progress. To support comparability, they should contain a common set of minimum elements while allowing Parties flexibility in how measures are designed and implemented.

- national baselines, targets and timelines, expressed in units consistent across Parties;
- institutional arrangements and responsibilities for delivery, including where EPR or equivalent producer obligations are used;
- priority waste streams, pollution hotspots and legacy accumulation zones;
- monitoring arrangements, including the extent to which reported data will be independently verified rather than self-declared;
- minimum environmental and social safeguards applying to waste management infrastructure, and the stakeholder engagement process through which affected and marginalized groups, including informal waste workers, will be consulted;
- finance, capacity-building and technology needs, stated with enough specificity to be actionable by providers of support; and
- indicators allowing implementation to be assessed over time and across reporting cycles.

Clear measurement, reporting and safeguard arrangements are particularly important where waste management systems and administrative capacity remain under development. Our experience shows that transparent frameworks are more likely to attract technical and financial support.

2. How could provisions on reporting, implementation and compliance, information exchange, and effectiveness evaluation support the overall implementation of the instrument, and what is the relationship between these articles?

Based on our experience designing and operating MRV and public registry systems, reporting, information exchange, implementation support and effectiveness evaluation should operate as a connected system. Reporting generates information; information exchange makes it accessible and usable; implementation support responds to identified barriers; and effectiveness evaluation assesses progress. The reliability of each function depends on the quality and integrity of the underlying data. The instrument should therefore recognize independent assurance as a distinct function that strengthens the credibility, comparability and usability of reported information. The instrument should:

- distinguish between self-declared data and independently verified data;
- support progressive strengthening of assurance over time; and
- allow Parties to draw on existing, credible third-party verification infrastructure.

Implementation support and compliance should remain distinct. The former identifies barriers to implementation and links Parties to support; the latter assesses whether obligations have been met. Combining them may discourage candid reporting and weaken the integrity of the system. The instrument should establish reporting obligations, core reporting parameters and effectiveness evaluation. Technical elements, including reporting formats, indicators, baseline methodologies and assurance guidance, should be developed and updated through Conference of the Parties decisions.

3. What will be the role of information exchange in the overall implementation of the instrument and how can it contribute to its effectiveness?

Information exchange is implementation infrastructure, not a reporting by-product. The following four functions matter most:

- **Transparency and public accountability:** Publicly accessible, project-level information allows researchers, affected communities, investors and Members to interrogate claimed outcomes. Verra's Plastic Program operates a public registry that permanently logs project documentation and verified outcomes for exactly this reason: outcomes that cannot be inspected cannot be trusted.
- **Structural prevention of double counting:** Unique identification, public recording and retirement tracking help prevent the same outcome from being claimed more than once across compliance, voluntary or public finance systems.
- **Interoperability with national systems:** Information exchange should support both practical learning and interoperability by enabling Parties to access methodologies, monitoring approaches and implementation experience, while promoting standards that allow verified information to move efficiently between systems.
- **Practical learning:** A central platform enabling Parties access to methodologies, baseline approaches, monitoring protocols and implementation lessons could accelerate implementation while reducing duplication of effort.

Cluster B - Releases and leakages; existing and legacy plastic pollution; plastic waste management; plastic product design; plastic products

Verra offers no views on Cluster B, question 1, for the reasons set out under Overall approach. Our support for prioritizing upstream measures is unchanged.

2. What type of enabling factors should be considered to address existing and legacy plastic pollution, including the process to identify and evaluate the locations or accumulation zones and subsequent remediation efforts?

Parties should use transparent, risk-based criteria to identify and prioritize accumulation zones, considering the scale and persistence of pollution, risks to ecosystems and communities, the likelihood of continued leakage, and the feasibility of responsible remediation. Baseline conditions should be documented before remediation so that subsequent outcomes can be measured and evaluated. Priority should be given to locations where remediation can reduce ongoing leakage and deliver the greatest environmental and social benefits.

Legacy pollution typically lacks both ownership and commercial value, making dedicated financing essential. Outcome-based finance can play an important role where remediation outcomes can be measured and verified. Key enabling factors include:

- Where remediation finance is linked to outcomes, a consistent approach to establishing baselines and additionality becomes important.

- Financing should be linked to independently verified outcomes rather than activities or expenditure. This requires defined baselines, documented monitoring, third-party verification, and transparent public recording to prevent double counting.
- Remediation should account for the final destination of the recovered material. Removing plastic from an accumulation zone without ensuring responsible end-of-life management risks relocating rather than solving the problem.
- Remediation activities should apply environmental and social safeguards, including protection of informal waste workers and responsible management of recovered material.

3. How can Parties cooperate in the implementation of effective waste management policies, taking into account the different national circumstances and needs?

Cooperation should be tailored to national circumstances. Parties with established systems may focus on interoperability and alignment, while those with limited administrative or technical capacity may require phased implementation, shared infrastructure, training and targeted financial support.

The bridging proposition is to differentiate the policy and harmonize the measurement. Parties retain full discretion over instrument choice: EPR, deposit-return, landfill restriction, public provision or a combination, and over targets and timelines. **What is agreed globally is the basis for measuring what those instruments deliver: consistent definitions, consistent baselines, consistent monitoring requirements, and a consistent expectation of independent verification.**

To achieve consistency across nations, the following can be considered:

- **Shared MRV and registry infrastructure:** A globally consistent MRV framework and registry function can serve many Parties so that they do not have to build their own; adopting a global framework can also align outcome verification across projects and geographies. This is most valuable where administrative capacity remains a constraint to implementation.
- **Verification capacity as a transferable asset:** Cooperation on criteria for identifying, approving and training local auditors builds durable national capability that serves every subsequent reporting cycle and extends to other waste streams. Existing third-party verification bodies operating under recognized certification programs can provide useful experience in outcome verification and auditor training while national capacity is being established.

Cluster C - Capacity-building, technical assistance, technology transfer, including international cooperation; financial resources and mechanism

1. What elements must be considered to ensure that all available financial sources, including public finance, are effectively mobilized for the implementation of the instrument?

Public finance is indispensable, particularly for infrastructure, institutional capacity and remediation with no revenue potential. The financial mechanism should use public and concessional resources strategically to complement domestic finance, producer responsibility funding and private investment, while mobilizing additional finance for priorities identified in National Plans.

- **Allocate funding based on credible and verifiable outcomes:** Where appropriate, public, concessional and private finance should be linked to outcomes that can be measured and independently verified. Consistent definitions, baselines and verification requirements improve accountability and provide a credible basis for reporting the impact of a multilateral fund.
- **Address early-stage costs:** Targeted public or concessional support can help projects in emerging economies, LDCs and SIDS meet early-stage development, capital and certification costs that constrain investment.
- **Apply common safeguards:** A common set of due diligence and safeguard expectations across providers, including multilateral development banks, would reduce transaction costs for recipients and shift focus on projects that mitigate environmental and social risk across the value chain.

2. What role should the private sector have in facilitating the mobilization of financial resources, capacity building and technical assistance, and what elements could be considered under the financial mechanism to promote such a role?

The private sector can mobilize finance toward verified environmental outcomes while complementing Party obligations and producer responsibilities. It can contribute as an obligated entity, an investor or offtaker of recycled material, and a provider of technology and technical assistance.

To promote responsible private-sector participation, the financial mechanism could support blended and results-based financing, risk-sharing instruments, project aggregation and transparent procurement linked to priorities identified in National Plans. These approaches should complement, not replace, Party obligations and producer responsibility. If the instrument recognizes outcome-based finance approaches, it should establish minimum integrity expectations for any such mechanism as below:

- **Additionality:** demonstration that the plastic waste would not have been collected or recycled absent the intervention, and that the activity is incremental to existing infrastructure.
- **Independent third-party verification:** validation and periodic verification of project design and monitoring data by accredited bodies against a published methodology, producing a transparent audit trail.
- **Social safeguards:** enforceable requirements on health and safety, fair wages, protection against loss of employment, prohibition of forced and child labor, and benefit sharing, particularly for informal collectors and processors.
- **Environmental safeguards:** assessment and mitigation of impacts on air, water, soil and biodiversity, monitoring of energy use and greenhouse gas emissions, and responsible end-of-life destinations for collected material.
- **Stakeholder consultation:** continuous consultation of directly affected stakeholders across the full project lifecycle.
- **Uniform measurement and transparent public recording:** a consistent monitoring framework and permanent public logging of verified outcomes and their retirement or use, preventing double counting.

These integrity elements are important not only for environmental outcomes but also for building confidence among investors, producers and public funders. Private and non-governmental actors can also provide MRV design, auditor training, registry infrastructure and operational expertise. The financial mechanism should enable Parties to procure the assistance identified in their National Plans.

3. What provisions related to technology transfer could foster international cooperation, considering the capacity differences between countries?

Technology transfer should cover physical infrastructure, and the systems, skills and institutional capacity needed to operate it effectively. Capital and equipment are major constraints, but infrastructure without data systems, maintenance capability, trained personnel and feedstock arrangements may not deliver lasting outcomes. Cooperation should therefore support:

- **Impact accounting systems:** Baseline methodologies, monitoring protocols, data standards and registry infrastructure that support national reporting and can be adapted from existing approaches, including the Verra Plastic Program.
- **Verification and audit capability:** Support for identifying, approving and training national auditors creates durable institutional capacity serving every reporting cycle and reduces long-term dependence on external assurance. Experience from accredited bodies operating under existing programs can support national audits while that capacity is built.
- **Institutional capability:** Technical assistance for policymakers, regulators and producer responsibility organizations on EPR policy design, implementation and enforcement, including support from standard-setting organizations when requested.
- **Operational capability:** Training, occupational health and safety, and the formalization and inclusion of informal sector workers build local capability without displacing them.

Transfer should be demand-led, structured around needs Parties identify in their National Plans. Beyond traditional North-South technology transfer models, the instrument should actively support South-South and regional cooperation, as Parties facing similar waste streams, institutional conditions and implementation challenges can often transfer practical solutions more effectively.

Cluster D - Preamble; objective; principles and approaches; definitions; just transition; public information, awareness, education and research; Secretariat; final provisions

Verra offers no views on Cluster D, questions 1 and 2, or on the Secretariat element of question 3. Our view that a just transition for informal waste workers should be treated as a core obligation is set out in our responses to A1, B2, C2 and C3.

3. Considering the progress achieved so far, does the current formulation in the Aid to Negotiations reflect the level of detail required?

The current formulation should provide greater clarity on the limited set of definitions that carry legal consequence and require consistency across Parties. Definitional inconsistency is among the most persistent practical obstacles in this sector, as the same activity may be counted differently across jurisdictions because core terms carry different meanings.

Whether collection outcome is measured at the point of recovery or at delivery to an appropriate destination; whether recycling outcome is counted based on input or output, and how process losses are accounted for; whether energy recovery falls within the scope of recycling; and what qualifies as plastic waste as distinct from recovered material, all vary materially between national systems. Where these terms differ, reported impact cannot be compared, progress cannot be assessed, and finance cannot be allocated against a common unit of outcome.

One concrete example is that the Verra Plastic Program treats collection and recycling as distinct outcomes because they address different environmental problems. Collection diverts plastic from the environment, including non-recyclable material sent to responsible end-of-life destinations. Recycling returns material to the economy and displaces virgin plastic. Conflating them can obscure whether reported progress addresses leakage, circularity or both.

The instrument should define the limited terms carrying legal consequence and requiring stability, including plastic waste, collection and recycling, with collection and recycling treated as distinct outcomes. Technical specifications, including measurement points, process losses, contamination, polymer categories, end-of-life criteria and reporting conventions, should be elaborated through Conference of the Parties decisions so they can evolve with practice and technology.

Closing

Verra remains available to the Secretariat, Co-facilitators and Members for technical exchange, including on National Plan guidance, definitions, measurement and the financial mechanism.