

EXTENDED PRODUCER RESPONSIBILITY IN ACTION IN THE PHILIPPINES





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Abbreviations

| | |
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| ALLWIES | Alliance of Workers in the Informal Waste Economy/ Sector |
| AMC | Alternative Materials Certificate |
| CENRO | City Environment and Natural Resources Office(r) |
| CPA | Certified Public Accountant |
| CSR | Corporate Social Responsibility |
| DAO | Department Administrative Order |
| DENR | Department of Environment and Natural Resources |
| DTI | Department of Trade and Industry |
| DOST | Department of Science and Technology |
| ECAR | EPR Compliance Audit Report |
| ECC | Environmental Compliance Certificate |
| ECOP | Employers Confederation of the Philippines |
| EMB | Environmental Management Bureau |
| EPR | Extended Producer Responsibility |
| FDA | Food and Drug Administration |
| HOPE | Friends of HOPE Inc. |
| GEF | Global Environment Facility |
| I3PA | Independent Third-Party Auditor |
| IEC | Information, Education, and Communication |
| IWW | Informal Waste Worker |
| LGU | Local Government Unit |
| MAG | Metrics Advisory Group |
| MENRO | Municipal Environment and Natural Resources Office(r) |
| MRF | Materials Recovery Facility |
| MT | Metric Tons |
| NAPSI | National Advocacy Plan for the Informal Waste Sector Integration |
| NEC | National Ecology Center |
| NPAP | National Plastic Action Partnership |
| OE | Obliged Enterprise |
| OSH | Occupational Safety and Health |
| PARMS | Philippine Alliance for Recycling and Material Sustainability |
| PBSP | Philippine Businesses for Social Progress |
| PCC | Plastic Credit Certificate |
| PCR | Post Consumer Recyclate |
| PET | Polyethylene Terephthalate |
| PPE | Personal Protective Equipment |
| PPRS | Plastic Pollution Reduction Standard |
| PRC | Professional Regulatory Commission |
| PRO | Producer Responsibility Organization |
| RA | Republic Act |
| R&D | Research and Development |
| rPET | Recycled Polyethylene Terephthalate |
| SKU | Stock Keeping Unit |
| SPWDC | Sworn Plastic Waste Diversion Certificate |
| UNPDF | United Nations Peace and Development Trust Fund |
| VVB | Validation & Verification Body |
| WACS | Waste Analysis and Characterization Study |
| WD | Waste Diverter |

I. Introduction

The Philippines has long been one of the biggest producers of ocean plastic pollution. In 2015, an average of 2.7 million tons of plastic waste was generated in the Philippines [1]. This called for systemic intervention through Republic Act 11898, or the Extended Producer Responsibility (EPR) Act of 2022. Over the last three years, the Philippines has rolled out one of the world's most ambitious laws on EPR, which requires companies with at least 100 million pesos (US\$1.7 million) in assets to take responsibility for an increasing percentage of their plastic footprint - measured in weight - from 20% in 2023 to 80% in 2028.

The Philippines has taken a pragmatic approach and crafted an accessible law that makes these goals achievable. The EPR Law outlines six upstream or midstream strategies (Figure 1) that may reduce producers' plastic packaging footprints, such as the use of recycled content (reducing virgin plastic consumption), reusable packaging, or refilling; and six downstream strategies (Figure 2) that aim to reduce the leakage of plastic waste into the environment through recovery and diversion of plastic packaging waste.



Figure 1. Reduction of non-environment friendly packaging [2]



Figure 2. Recovery programs aimed at effectively preventing waste from leaking to the environment [2]

In 2023, the Philippines recorded 947 registered Obligated Enterprises (out of an estimated 2,130 producers who exceed the threshold of large enterprises or whose assets exceed PhP 100 million) under the EPR scheme, and reached 34% recovery and diversion, exceeding its target of 20% recovery by 14%. The total recovery and diversion was reported at 164,000 MT out of 489,000 MT of plastic packaging footprint. It is to be noted however that the recovery and diversion rate is limited by those who have registered an EPR Program and submitted their annual reports.

II. Objectives and Scope of Report

EPR implementation in the Philippines is already in its fourth year in 2026, with a target of 50% recovery and diversion of producers' plastic packaging footprint. The country is at a critical stage as limited waste management infrastructure is nearing its capacity and plastic packaging production is unwavering. It becomes more difficult to meet the increasing recovery and diversion targets by merely relying on existing waste management infrastructure. The way forward is through real footprint reduction and investment in increasing capacity through infrastructure developments.

It is also important for policymakers and stakeholders to understand the current baselines of waste management; however, there is a significant limitation in data management and monitoring. The Philippines has 82 provinces, 149 cities, 1,493 municipalities, and 42,011 barangays¹ [3]. This becomes a challenge for both accurate basis and effective roll-out of the EPR Law. Within most Local Government Units (LGUs), there are unsung heroes of waste

¹ Translates to: villages or the smallest LGU in the Philippines

management—the Informal Waste Workers (IWW)—who are seen as essential for waste management but are currently unlikely to benefit from EPR. A baseline analysis conducted by Anthesis and SYSTEMIQ for the Philippines’ National Plastic Action Partnership (NPAP) Metrics Advisory Group (MAG) showed that in 2020, the Philippines generates more than 1.7 million MT of plastic waste annually [4,5,6]. Fifty-five percent is collected by the formal and informal sectors while 45% is uncollected and becomes the main source of aquatic, terrestrial, or aerial (through open burning) pollution. Informal collection accounts for about 20% of the collected tonnage. The same report shares that approximately 10% of the country’s plastic waste is being recycled, with the informal sector driving more than half (~70%) of materials sent for recycling. [7]

This report presents implementation strategies for the identified gaps above, to inform policymakers on further improvements to the EPR system. It focuses on the following areas:

- Data management and monitoring systems
- Social inclusion
- Upstream and midstream interventions, including Information, Education, and Communication (IEC)

Together with presenting EPR practices, the report will underline why these work, in the hopes of providing benchmarks and inspiration for Waste Diverters, LGUs, and Obligated Enterprises (OEs) for their own EPR programs and initiatives. This report also aims to provide policymakers a basis for replication and scaling of practices on a national level, while ensuring transparency, credibility, and accountability within the implementation and compliance to the EPR law.

III. Methodology

The focus areas for this report were consulted with and recommended by the Department of Environment and Natural Resources (DENR). Five guide questionnaires were designed for the study—one for each stakeholder type (Annex 2). These stakeholders were the OEs, Collectives, Producer Responsibility Organizations (PROs), Waste Diverters (WD), and the Informal Waste Sector (IWS). Organizations were invited to participate in individual consultations conducted through online interviews. The Chatham House rules were observed for all consultations, and named stakeholders provided their consent to be cited as a source in this report. The contents of this report were consulted with each stakeholder to ensure accuracy of information and to provide as well an opportunity to clarify and expand upon the information. Stakeholders who participated are listed in Annex 1.

Participants were selected based on their industry type and the modality of their EPR program, with the goal of ensuring a balanced representation of sectors and stakeholder groups. The project team contacted 67 organizations, but not all responded or agreed to participate. This report includes 26 organizations/stakeholders from which the team was able to gather first-hand information. It is not intended to be an exhaustive listing of EPR strategies across the Philippines.

IV. Focus Areas

A. Data Management, Monitoring, and Reporting Systems

The obligations of Obligated Enterprises under the EPR law may be divided into three:

1. Register and phase in the implementation of an EPR Program within six (6) months following the effectivity of the EPR Act of 2022;
2. Comply with annual recovery targets for their plastic packaging footprint;
3. Submission of an independent third-party audited report containing the plastic packaging footprint, recovery and diversion accomplishments, and EPR program compliance on an annual basis (i.e. the EPR Compliance Audit Report, ECAR, as guided by DAO 2024-04)[8].

The EPR Law requires companies to monitor and report their compliance through the ECAR. The ECAR is guided by the EPR Implementing Rules and Regulations (DAO 2023-02) and the compliance reporting and auditing guidelines for the EPR Act of 2022 (DAO 2024-04). One of the key components of the ECAR is a verification performed by an Independent Third-Party Auditor (I3PA). Included in the audit report are two critical components: Accountable Plastic footprint of the OE (or in cases of Collectives or PROs, the aggregated footprint of its members), and the Accounted Waste Diversion Accomplishment of the OE, PRO, or Collective.

To ensure the integrity and credibility of data and subsequently the reported impact of EPR, it is important that the accounted waste diversion accomplishments are sufficiently supported by auditable and traceable evidence.

Effective recovery diversion programs are built around robust data management systems. Producer Responsibility Organizations, and in turn, Waste Diverter organizations, have implemented various systems that facilitate data tracking and management, with some equipped with additional safeguards for data integrity, verification, traceability, and protection against double counting. The following practices demonstrate systems that credibly measure, verify, and report plastic footprint and recovery volumes.

Third-Party Verification and Data Integrity

The Philippines allows OEs to perform their EPR reporting as individual enterprises, collectively as a group of enterprises, or authorize a PRO to report on their behalf. PROs are tasked with supporting multiple companies' EPR compliance from registration to reporting, and managing data from OEs, Auditors, and Waste Diverters. PROs, such as PCX Solutions and the Philippine Alliance for Recycling and Materials Sustainability (PARMS), have developed robust systems for third-party verification and efficient reporting.

PCX Solutions' EPR Program includes multiple safeguards for its data and credibility of impact. Their EPR Program utilizes four types of audits for this purpose, namely:

1. Footprint Verification – requiring the individual OE members to engage an Independent Third-Party Auditor (I3PA) to conduct individual plastic packaging footprint verification. The audit reports are utilized by PCX Solutions to ensure that the consolidated accountable PRO footprint is accurate.
2. Project Registration, Validation and Verification – PCX Solutions operates a fully transparent and publicly available framework for the registration of plastic waste recovery and diversion projects, and for the issuance of plastic credits, called the Plastic Pollution Reduction Standard (PPRS). Waste recovery and diversion projects can register under the PPRS after successfully completing a Conformity Assessment performed by an approved Validation and Verification Body (VVB). The conformity assessment determines if a project meets the criteria of the PPRS which are: environmentally sound processes, environmental and social safeguards, additionality and ownership, and traceability and transparency. While this is currently not required by the Philippine EPR law, this ensures that the reported impact enabled by plastic credits is credible and safeguarded.
3. Impact Verification – For PPRS registered projects, PCX Solutions engages an I3PA for the review and verification of the chain of custody documents provided by Project Partners and/or Waste Diverters. Impact verification is done prior to the issuance of Plastic Credit Certificates (PCCs) and/or Sworn Plastic Waste Diversion Certificates (SWPDCs).
4. EPR Compliance Audit – responsible for reviewing and verifying the EPR Compliance Audit Report that the PRO has consolidated and will subsequently submit to the Department in compliance with the EPR Act of 2022. The ECAR I3PA is engaged by the PRO.

Through its EPR Portal, the PARMS facilitates the registration process and maintains OE data for effective compliance monitoring. All partner stakeholders—such as OEs, waste diverters, and Third-Party Auditors—are required to register through the portal. Each stakeholder group must submit specific requirements to complete registration, such as Environmental Compliance Certificates (ECCs) for waste processors and Professional Regulation Commission (PRC) licenses for Third-Party Auditors.

PARMS ensures that all footprint reports submitted by OEs and all waste diversion credits from waste diverters are verified by Third-Party Auditors. The system is also designed to accommodate potential integration with third-party software, enabling streamlined compliance and cross-verification processes. Beyond audit support, the portal captures and analyzes granular recovery data, allowing OEs to identify high-performing diverters and optimize their diversion strategies.

Evergreen Labs—a waste diverter—maintains supply chain integrity through its comprehensive verification framework:

- Process audits for the recyclers - which involves on-site facility inspections and detailed analysis of recycling operations and outputs.
- Certificate audits that verify proper waste diversion and recycling - which looks into documentation review and confirmation of end-of-waste status.

Why it works:

- Standardizes validation across large OE and Waste Diverter networks
- Enhances auditability and regulatory body confidence
- Streamlines systems and processes for efficient and effective compliance
- Offers a replicable and scalable framework for EPR compliance monitoring and reporting

End-to-End Traceability of Value Chains for Plastic Waste Recovery and Diversion

Evergreen Labs delivers technology-enabled supply chain solutions for waste management through complete traceability and community empowerment. Their proprietary INCLUSIV application, co-developed with ASM Global—a traceability and software development company—provides clients with real-time visibility into every stage of the supply chain, capturing critical traceability data including collection volumes, photographic documentation, precise geolocation coordinates, verified truck scale receipts, detailed plastic categorization, and rigid-to-flexible ratios. This technological foundation ensures accountability across their operations.

Waste Diverter, Geocycle Philippines, has already established robust processes within its current Enterprise Resource Planning (ERP) system that promote end-to-end traceability and prevent double-tagging of transactions. To fully support their Extended Producer Responsibility (EPR) business, they integrated these operations directly into their ERP platform. This ensures that every step—from the point of collection to final treatment—is accurately documented, automatically capturing crucial data such as delivery receipts, waste characterization, moisture analysis, and truck weigh-ins across our facilities.

Waste Diverter, Plastic Bank’s blockchain-powered application and serialized receipt system helps deepen traceability. Every waste transaction is recorded with a unique ID and linked to an auditable impact dashboard (accessible to clients and partners). This system also serves the informal sector, capturing their contributions without compromising accountability. Plastic Bank’s impact programs are third-party audited and fed into ECARs of OEs.

PCX Solutions’ Plastic Pollution Reduction Standard (PPRS) offers a clear, rigorous, transparent and public framework for assessing and registering plastic recovery and diversion projects, and is considered as one of the most robust global standards for Plastic Credits and Plastic Recovery and Diversion [9,10]. It includes strict environmental and social safeguards and a robust, end-to-end impact verification process for full accountability and transparency.

The PPRS requires its registered project partners to undergo a conformity assessment and regular compliance monitoring, and full chain of custody documentation and third-party verification is required to issue Plastic Credit Certificates (PCCs). This builds trust among stakeholders and secures funding for better waste management. The end-to-end value chain and accompanying chain of custody documents are provided in Figure 3. Furthermore, all PPRS issued Plastic Credits are recorded in the publicly available [PPRS Registry](#) for full transparency and to safeguard against double counting.

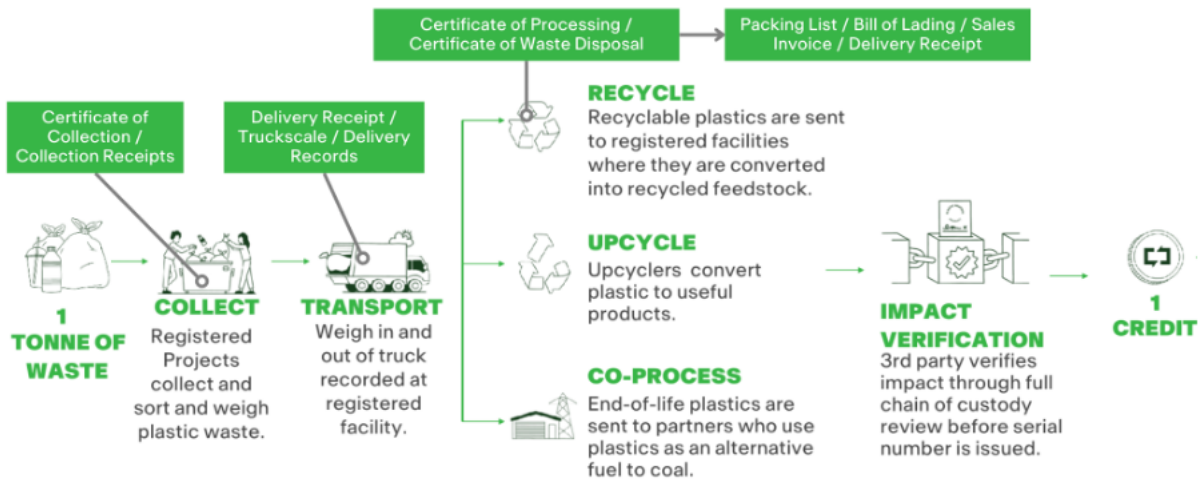


Figure 3. PCX Solutions requirements on chain of custody for waste recovery and diversion

There are Waste Diverters who are registered under PPRS, such as Royal Rainbow Recycling Inc., Top Lun Plastic Corporation, Greencycle Innovative Solutions, Inc., Friends of Hope, Inc., and Metro Ace Packaging Corporation. All of which issue plastic credits (non-exclusively) through PCX Solutions' PPRS framework. Internally, they operate spreadsheet-based tracking systems supplemented with batch IDs, receipt documentation, and third-party audits. These setups, while simple, meet the verification standards and EPR requirements.

Why it works:

- Enables transparent end-to-end tracking
- Supports small and large operators using tools matched to capacity
- Prevents double counting and enables full auditability

Waste Composition and Characterization Adjustments

Waste Analysis and Characterization Study (WACS) is a powerful tool in ensuring that the reported and declared diversions are accurate in that the claimed wastes are 100% plastic packaging wastes (whether flexible or rigid). It is important to understand the composition of waste streams, especially in diversion facilities that process mixed wastes or accept unsorted and unsegregated wastes. Without a WACS, there is doubt on the accuracy of the reported diversion. Although typically carried out by LGUs to quantify and characterize waste streams within their jurisdictions as part of their mandatory 10-year solid waste management plans

under RA 9003, Greencycle Innovative Solutions and Geocycle Philippines have used WACS to increase the credibility of their EPR reporting.

Waste Diverters—Greencycle Innovative Solutions and Geocycle Philippines—both use WACS to ensure recovered plastic meets processing standards and EPR credit eligibility. Greencycle—audited by the DENR in October 2024—performs WACS at their sites quarterly to distinguish between rigid and flexible plastics, confirm post-consumer origin, and measure moisture content and calorific value (for co-processing suitability). Geocycle conducts source-specific WACS twice annually and uses the results to assign adjustment factors for waste supplied by each source. These metrics inform the volume and credibility of the received and processed tonnages.

PROs such as PCX Solutions and the Philippine Business for Social Progress (PBSP) also offer WACS services to OEs and Waste Diverters to verify recovery volumes, provide a deeper understanding of their waste streams, and find opportunities for improvement of waste management practices and reduction at source.

Why it works:

- Increases accuracy and integrity of reported diversion
- Allows data-driven and evidence-based decision making in waste management, in order to maximize circularity in the waste management option
- Enables waste reduction opportunities when tailored to a brand or company

B. Social Inclusion

The EPR law recognizes the IWW sector as an essential part of solid waste management, especially with regards to the collection, sorting, and recovery of post-consumer plastic waste. The Implementing Rules and Regulations (IRR) encourages that IWWs are integrated into the system and not displaced. However, significant challenges remain in incentivizing their inclusion and formalization, establishing sustainable cooperative structures, ensuring proper health and safety protections, and creating systematic pathways for legitimate integration into the formal waste management system.

The IWWs from Smokey Mountain, Baseco, and Happyland in Manila have been making a living from waste picking since their adolescence. IWWs collect, sort, and wash waste from the streets, households, or MRFs, then sell to junk shops. This is how they put food on the table and get their children through school. They understand the importance of their work, their role in waste management in the country, and their contribution to helping keep the environment clean. They are also aware that they are undervalued, and lament the stigma and lack of recognition for their livelihood. Like many IWWs, they continue to operate without access to protective equipment, fair compensation structures, or social protection benefits, while existing cooperative models face sustainability issues due to limited technical and financial support.



Figure 4. IWWs Arnel, Luz, and Yolanda

In February 2025, the Department of Interior and Local Government (DILG) introduced Memorandum Circular 2025-012, the Integration of Informal Waste Sector into the Solid Waste Management Plans of LGUs. This memorandum advises LGUs to conduct baselining and profiling of IWWs, provision of health, social welfare, and basic services, registration and formation of cooperatives and collective units, and other steps to integrate the IWWs into their solid waste management plans [11]. While this has set in motion an attempt to formally integrate IWS in waste management through the LGUs, there is still an opportunity to institutionalize IWWs integration within the EPR programs of OEs, Collectives, PROs, and activities of waste diverters.

Even with no formal integration mechanisms yet for partnerships with the IWW sector, OEs and Waste Diverters have started initiatives to integrate IWWs in their waste management and EPR activities. They offer various programs and incentives to recognize, empower, and uplift the very backbone of waste management in the Philippines.

Community-based Incentive Programs and Localized Partnerships

The EPR law is encouraging partnerships among OEs, Waste Diverters, PROs and community organizations to address plastic pollution. One standout approach observed in relation to these partnerships is the use of localized incentive-based programs.

HOLCIM Philippines' (OE) *Adopt-a-Community* program provides incentives for IWWs and community waste sorters through food exchange, livelihood training, and inclusion in performance monitoring systems. These are implemented in tandem with LGUs, helping ensure that EPR operations are locally grounded and socially responsive.

Geocycle enters into agreements with LGUs to divert their post-consumer waste. Currently, they have partnered with more than 70 LGUs nationwide and have diverted at least 22,000 tons of post-consumer waste annually. They also work with waste pickers in Payatas, Quezon City, and implement a structured engagement with them that includes health and safety training and recognition for their labor. These partnerships also improve segregation and reduce material contamination at source, helping increase the diversion rate.

Nestlé Philippines Inc. (NPI, OE) has previously partnered with Pure Oceans, a marine conservation social enterprise, for community capacity building programs on composting, segregating, and collection and diversion of plastic waste to junk shops and processors in Lipa, Batangas. Jointly, they have also designed and deployed boats to transport plastic waste from the island of Tingloy to the municipality of Mabini, Batangas. Through partnerships with LGUs, Nestlé has also improved solid waste management capacity by establishing Material Recovery Facilities (MRFs) in Cabuyao, Lipa, and Caloocan. The partnership has already ended, however the notable achievements as reported by Nestlé are as follows²:

- Inclusion of solid waste management plans in the barangays where NPI operates in
- Identification of junk shops in Barangay Bagoong Pook, Lipa for diversion of recyclables from landfill-bound wastes
- Since the program, the same Barangay has implemented and maintained a waste collection schedule (since November 2024). The frequency and schedule was defined in accordance with the intended destinations (i.e. Monday and Wednesday – sanitary and residual wastes bound for a sanitary landfill; Friday – collection of recyclables designated for the MRF or junkshop)
- Households actively segregate waste, with many consolidating recyclables—including textiles, glass, and broken appliances—over a period of time, before selling or exchanging them through the City Environment and Natural Resources Office/ Officer's (CENRO's) *Trash to Cash/Goods* program held three times a year. Barangay Bagong Pook had the biggest participation in the last *Trash To Cash* run. The community's commitment to proper segregation, and the separate days for when recyclables are collected, have reduced contamination of recyclable materials.

Greencycle Innovation Corporation, through its partnership with the Laguna Lake Development Authority, hosts coastal cleanup drives around the towns bordering Laguna Lake. These coastal cleanup drives have become a platform not just for community awareness on plastic pollution, but also for OE and LGU collaboration. These enable OEs to support LGU programs and offer community incentives including cash, product vouchers, and technical assistance for fisherfolk and communities in the coastal towns. In 2024, nine LGUs participated in coastal cleanups, collecting 4,186 kilograms of plastic waste that was subsequently diverted responsibly.

² Quantitative information is either unavailable or undisclosed by the interviewee

Evergreen Labs takes a grassroots approach to Extended Producer Responsibility (EPR) and waste management. Through strategic partnerships with recyclers, OEs, and LGUs, the company establishes collection sites and recycling facilities directly within communities. Under their incentivized waste exchange system, they drive collection by providing locally-identified necessities such as rice, groceries, cash, in exchange for waste. They have established operations across 50 collection points and communities while partnering with five diversion partners. They have also constructed four state-of-the-art recycling and collection facilities.

Evergreen Lab's distribution model ensures EPR fees are allocated across:

- Community incentives
- Transportation and logistics infrastructure
- Recycling operations
- Independent auditing and verification processes

Plastic Bank's work integrates IWWs into the EPR system. They have over 20,000 registered collectors in the Philippines, enabling IWWs to earn supplemental income³ while gaining access to banking, insurance, and identification documents.

PARMS recognizes other entities that contribute to the waste diversion chain, including but not limited to Social Enterprises, Cooperatives, Local Government Units (LGUs), and Civil Society Organizations. These organizations may be engaged in collection programs and often collaborate with registered waste processors. This inclusive approach provides a platform for more stakeholders to actively participate in the EPR Program, empowering communities to contribute meaningfully to the circular economy.

Why it works:

- Aligns EPR objectives with existing LGU and national social development priorities
- Creates mutually beneficial models for OE compliance and social impact
- Builds local trust and community stewardship
- Recognizes and rewards the contributions of the Informal Waste Sector and communities
- Enables increased livelihood opportunities and access to formal systems through the creation of legal identities (identification) such as insurance and banking

Empowering Women and Children

Friends of HOPE, Inc. (HOPE, waste diverter), a non-profit organization runs *Aling Tindera*, a community-based plastic waste collection program with over 90 sites across the Philippines. The program provides infrastructure, equipment, arranges logistics, and facilitates end-of-waste processing allowing the "Aling Tinderas" (loosely translated to "Woman

³ Quantitative data for incremental income has not been provided or disclosed.

Microentrepreneur," referring to select women who own community or variety stores) to run a local collection program and earn additional income through EPR. Community members sell their rigid and flexible post-consumer plastics to the AT, who sort and clean them before selling to HOPE. HOPE then facilitates the logistics and ensures proper diversion to recyclers and processors. The Aling Tindera program is registered under PCX Solutions' PPRS, and generates credits which allow OEs to support or fund the program's operations by purchasing these credits. OEs who support the Aling Tindera program perceive their credits to have higher value because of this social inclusion aspect. For the year 2024, the *Aling Tindera* Program reported recovering and diverting over 3.8 million kilograms of plastic waste from nature, translating to a 37% average monthly income increase for the Aling Tinderas (vs. their baseline without income from the program) and over PhP 9.5 million in community revenue [12].

PBSP's member OEs gain access to the benefits and opportunities that they offer their corporate members, and centers around their enhanced Corporate Social Responsibility (CSR) programs. PBSP's EPR revenue is used towards these programs under their *NextGen* initiatives. Some of their flagship programs are the *Masustansyang Pagbubuntis, Masiglang Kamusmusan (MaMa)*⁴, which assists pregnant moms and their infants for the first two years, and *Literacy Enrichment Training and Reading Assistance (LETRA)*⁵, which capacitates educators and supports struggling readers in public schools. *MaMa* has been launched in several regions, namely Arteche (Eastern Samar), Don Salvador Benedicto (Negros Occidental), and Mabuhay (Zamboanga Sibugay). Across these provinces, 221 Mothers received comprehensive antenatal care and nutrition education, and 63 Barangay Health Workers and Nutrition Scholars have been engaged. *LETRA* on the other hand has trained 50 Teachers in Arteche, Mabuhay, Caloocan City and Las Piñas City. [13]

Greencycle's partnership maintains a partnership with a women's cooperative in San Jose del Monte. This environmental organization composed of women sewers has been a reliable and sustainable partner in the conversion and transformation of 100% recycled plastic sacks to quality, durable and reusable eco bags. This is part of the Greencycle's commitment to inclusive sustainability and women empowerment. By providing access to recyclable materials, skills and consistent livelihood opportunities, it has enabled these skilled and dedicated women of the association to earn additional income⁶ while actively contributing to waste diversion and strengthening the concept of circular economy.

Prior to the establishment of EPR, the Alliance of Workers in the Informal Economy/Sector (ALLWIES) worked with the Worldbank and the International Labour Organization (ILO) in a project that established cooperatives for waste pickers in Payatas, Quezon City (QC). Organization through cooperatives provides access to credit, social security, and government health insurance. Social support such as breastfeeding training, provision of lactation equipment, and establishment of child daycare centers were also important contributions of

⁴ Translates to: A healthy pregnancy leads to a lively childhood; the abbreviation 'MaMa' translates to mother

⁵ Context: the acronym LETRA as a word means letter (i.e. alphabet)

⁶ Quantitative data for impact or additional income unavailable.

the project because 90% of the waste pickers involved were women of reproductive age. The project also designed lightweight gloves for waste pickers to encourage the use of PPE.

Why it works:

- Centers women as leaders in waste management, positioning them not only as collectors but as entrepreneurs, cooperative managers, and value chain actors
- Improves working conditions and social protection through innovations in occupational health and safety, cooperative organization, and access to childcare and health services
- Demonstrates effective use of EPR funds to build economic resilience in vulnerable communities, particularly for women in the informal sector

Local Government Support for the IWS

In Marilao, Bulacan, the Municipal Environment and Natural Resources Office (MENRO) maintains an MRF that provides livelihood opportunities to the Red Antz, a group of 30 IWWs who sort through municipal waste and recover recyclable materials from the facility. The Red Antz previously worked in the open dumpsite, where they were heavily exposed to the elements. The dumpsite has since been closed and rehabilitated by the Marilao LGU. Since then, they have been allowed to work within the Marilao MRF which provides protection against rain and direct sunlight. Additionally, the MRF is situated within the *Liwasang Pangkalikasan ng Marilao* which is a secure compound managed by the LGU. Currently, trucks serving the barangays within the municipality use the MRF as a transfer station, wherein they dump consolidated waste onto the sorting area. The members of the Red Antz then rummage through the waste and recover what they can. Whatever they find is then sold to nearby junk shops or aggregators, giving members of the Red Antz additional earnings from the recyclables. They also work closely with a HOPE Aling Tindera collection point stationed just outside the MRF where they sell low-value plastics. For this work, the MENRO provides the IWWs with an improved working space, protection from the elements, PPEs, and tools. On average, the Red Antz members generate PHP 1,500 per week, depending on their capacity, price of materials, and the waste diverted to the MRF. Once the Red Antz workers sort through the waste, those that remain are loaded onto bigger trucks headed for co-processing facilities or landfills.



Figure 5. Red Antz Norma and Maila at work

The *Red Antz* sort around 150 MT of plastic waste per month, effectively diverting these from landfills into recycling or co-processing instead. Sending plastic waste to landfills costs the MENRO PHP3/kg, amounting to PHP450,000 in for the same volume diverted by the *Red Antz*. Through this relationship with the IWS, the MENRO saves an estimated PHP 6,000,000 (USD 104,000) in a year from their solid waste management budget, which can be allocated for other programs for the IWS and the improvement of their solid waste management.



Figure 6. Red Antz MRF at Marilao, Bulacan

The Marilao MENRO is working closely with the Marilao LGU to carry out the Integration of Informal Waste Sector into the Solid Waste Management Plans of LGUs, as advised by Memorandum Circular 2025-012 of the DILG. With the municipal planning office, population office, and the Mayor's office, they are working towards surveying and completing an inventory of the IWS, their families, and their complete demographics. This will pave the way for them to scale the livelihood program with the *Red Antz* throughout the Municipality of Marilao.

Furthermore, the MENRO continues to advocate for the *Red Antz* livelihood through coordination with the Marilao LGU as leadership changes every three years. They have maintained the program with the Red Antz across three different mayors, whose terms in office all come with their own programs and priorities. The Municipality of Marilao with its current leadership, aims to improve segregation at source. Due to their limited infrastructure, particularly the insufficient number of dump trucks, they have devised a scheduled segregation and pickup scheme which, when implemented, will pose challenges to the *Red Antz*, which currently rely on sorting waste daily at the MRF for their livelihood. The proposed program will reduce the number of days that the IWWs can work at the MRF since only select days will be designated for the collection of recyclable and residual waste. The MENRO is managing this challenge by exercising its advisory position in the design of the upcoming Municipal Ordinance, ensuring that it can effectively improve segregation at source while minimizing its negative impact on IWWs like the *Red Antz*.

Alternative Recycling with Social Impact

As EPR matures in the Philippines, more OEs are starting to move towards the transition to a more circular economy. There is currently a gap in circularity for flexible plastic wastes, and while infrastructure and technology is catching up, several OEs are looking into alternative recycling, whether upcycling or downcycling, as a more environmentally friendly alternative to other diversion methods.

Shell Pilipinas (OE), through the purchase of credits and continued partnership with PCX Markets (Platform), supports the *Environment Friendly Timber (EFT)* Project of Metro Ace Plastic Corporation, an upcycling enterprise in Davao City. Shell Pilipinas commissioned the upcycling of 3,000 kilograms of plastic waste into 110 upcycled bike racks from EFT and have already deployed 55 of these across their Shell Mobility sites.



Figure 7. Shell Pilipinas Corp. upcycling in partnership with MetroAce Plastic Corporation and PCX Markets (Photo Credits: Shell Pilipinas Corp.)

Unilab Inc. (OE), in an effort to support the recycling ecosystem in the regions, partners with Envirotech in Davao to upcycle plastic waste into chairs for donation to public schools in the city.

Similarly, PBSP and Shell⁷ have partnered with Sentinel Upcycling Co. (Waste Diverter) to also donate upcycled chairs to public schools as part of the Department of Education’s (DepEd’s) *Brigada Eskwela*⁸ initiative. PBSP has reported the donation of 90 upcycled chairs in 2024 [13].

As part of its commitment to inclusive and sustainable waste management, PARMS encourages its OEs to support community-led initiatives such as the Baseco Recyclers, Advocates and Vanguard for the Environment (BRAVE) Project, implemented by KABALIKAT sa Baseco Group in partnership with Sentinel and PARMS. This partnership promotes environmental stewardship and livelihood opportunities in Baseco, Manila, further strengthening the EPR Program’s environmental and social impact.



Figure 8. BRAVE Program implemented by Sentinel, PARMS, and KABALIKAT sa Baseco Group (Photos provided by PARMS)

⁷ Quantitative data unavailable

⁸ Translates to: School Brigade

Why it works:

- Creates economic and social value from post-consumer plastic, making recovery more attractive and viable
- Integrates EPR with social impact, benefiting public schools, low-income communities, and informal workers

C. Upstream and Midstream Interventions

The EPR law mentions six upstream and midstream measures including reusable packaging, refilling systems, recycled content, and adoption of alternative materials. However, there currently lacks clear guidelines for the execution and crediting of upstream and midstream interventions. Nevertheless, several OEs are seeking ways to reduce plastic content in packaging through these measures.

Removal or Reduction of Plastic Components in Packaging

Some OEs have already started with 'low-hanging fruits' in terms of removal or reduction of plastic components in their packaging. Shell Pilipinas, through its Shell Select Stations, have limited the use of single use plastics to just water bottles and reusable food packaging containers (restriction only applies to Shell Select Brands). Nestlé has removed stretch film in their operations and select secondary packaging, and has switched to using water-soluble glue for packaging⁹.

Why it works:

- Reduces or eliminates unnecessary plastic packaging

Redesign

Since 2020, Nestlé has been transitioning to using monomaterials and designing packaging for recycling. They have minimized the overhead space in their Bear brand products to reduce packaging weight, even if it makes their product visibly smaller than those of competitors risking consumers' perception of having less product inside. Together with other initiatives, Nestlé has reported a 21.3% reduction in virgin plastic usage in 2024 (versus their 2018 baseline). By 2025, Nestlé aims to design above 95% of its plastic packaging for recycling systems and continue to work towards 100% being recyclable or reusable; and aims to reduce its use of virgin plastic by one third, versus 2018 baseline. [14]

Human Nature has made their products available in bulk stock keeping units (SKU) that are packaged with minimal labels, even at the risk of lowered marketability and aesthetics, in favor of better recyclability. Human Nature claims on their website [15] that their upsized SKUs can reduce the quantity of plastic bottles consumed by 14% - 89% (depending on the product).

⁹ Quantitative data undisclosed

Human nature has also eliminated the plastic in at least 11 products [15] and shifted to paper-based packaging.

Why it works:

- Designing for recycling can encourage investments into infrastructure

Refill Solutions

Human Nature offers refilling for their home care products at selected branches (Commonwealth Ave., SM The Block, SM Megamall, and TriNoma). They estimate the potential plastic reduction from refill is approximately 1.59 kilograms for every refilled carbuoy. To encourage consumers to participate in refilling, the potential savings and environmental benefits are highlighted. They also intend to expand their refilling line to include their cosmetic products, which they are continuously petitioning to the Food and Drug Administration (FDA) since it requires enhancements to current regulations prior to implementation.

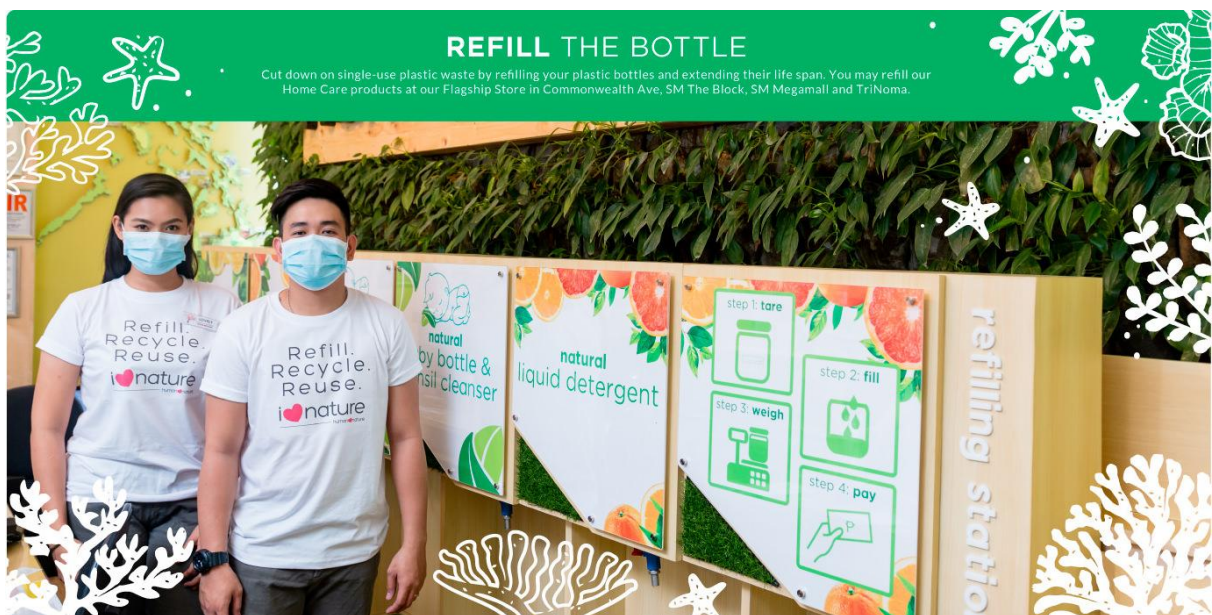


Figure 9. Human Nature refilling stations in select branches (Photos from the company's website)

Why it works:

- Reduces or eliminates plastic packaging, especially single-use
- Contributes to behavior change of consumers

Reuse

Pilmico Foods Corporation, a Collective of six companies in the flour and feed industry, has achieved 60% recovery and diversion of their plastic footprint, 20% higher than the required EPR target of 40% for the compliance year 2024. Remarkably, they fulfill their compliance by recovering their plastic packaging (plastic sacks) through their own program. They then divert this by partnering with junk shops and farmers that reuse the sacks as packaging for other

materials such as seeds and agricultural inputs. Recovered sacks which are not suitable for reuse are sent to recyclers for crushing and processing into raw materials.

Why it works:

- Demonstrates practical pathways for reuse, offering a more circular approach to recovery and diversion strategies

Recycled Content

Shell, with the lack of available alternative materials to adequately package oil and petrol, have adopted the use of 30% recycled plastic for their Shell Helix containers¹⁰. As part of a global commitment by Shell, they will also be increasing their recycled content to 50%.

Both Human Nature and Pepsi Cola Products Philippines, Inc. (PCPPI, OE) are exploring the use of recycled PET for their product packaging, with PCPPI already piloting the use of rPET for their beverages. However, considering the cost of post-consumer recycled plastic (PCR), which is estimated to range between 50-70% above virgin PET cost in the Philippines, OEs expressed the need for incentives or possible crediting of recycled content into their EPR compliance to move beyond the pilot phase.

Why it works:

- Reduces the use of virgin plastic
- Increases demand for PCR in the Philippines

Alternative Materials

In 2025, PCX Solutions started working with the Department of Trade and Industry - Board of Investments (DTI-BOI) to advance the concept of Alternative Material Certificates (AMCs) in line with the Philippine Bioplastics Industry Roadmap. By 2026, this evolved into a dual-component financial mechanism designed to cover the entire lifecycle of alternative materials. This mechanism bridges the "material premium" gap in up- and midstream production and enables funding downstream logistics and recovery in the post-consumer phase. For the purposes of this report, "midstream" refers to interventions that encourage or support innovation to prolong the life of products where plastics are required, by developing or improving recyclable or reusable products, by establishing circular systems, and by reducing unnecessary consumption of single-use plastics by both consumers and commercial users [16]. The AMC is a dual-component financial instrument that allows funding to support different actors in the value chain, with the funding indexed to their specific contribution to the project. This could be the value of the upstream material substitution ("the material premium) or the value of the downstream logistical outcome to recover the new materials introduced in the market. In practice, this design allows AMCs to help offset the higher cost of producing goods with non-fossil materials while also financing the downstream systems needed to

¹⁰ Quantitative data for impact currently unavailable or undisclosed.

collect, sort, and process these materials after use to ensure that they remain part of a circular system[17].

AMCs also provide a financial incentive for assessing alternative materials to determine their suitability as replacements for single-use plastics in specific applications. This addresses several challenges that are preventing OEs from adopting alternative materials for packaging: In the food and beverage sector, alternative materials need to be food safe, have adequate moisture barriers, and retain the same shelf life and quality of the product that its current plastic packaging protects. In pharmaceuticals, the products must remain stable and protected from contamination. For feed products in the agricultural sector, alternatives need to address quality preservation and moisture content retention. These requirements, along with the material's lifecycle impacts, with consideration of local realities such as extraction, use, transport, and disposal will be assessed under the AMC framework. Over time, the AMCs can encourage the shift to alternative materials by ensuring that they are competitively priced and available at a scale large enough to meet the demands of producers.

Information, Education and Communication (IEC)

Nestlé Philippines launched the *No Time to Waste* program targeting Local Government Units (LGUs). The initiative delivers capacity-building sessions that discuss climate change, solid waste management, the establishment of Material Recovery Facilities (MRFs), and the formation of "green councils" to strengthen the institutional backbone of City and Municipal Environment Offices. In 2024, Nestlé also hosted the *National Recycling Conference*, bringing together LGUs, waste value chain actors, PROs, and industry leaders to identify opportunities for packaging-to-packaging recycling that could unlock scalable circularity models in the Philippines.

In parallel, Nestlé conducts supplier education seminars in its offices. These sessions provide a platform to surface challenges, share reduction strategies, and co-develop ideas to reduce both plastic footprint and GHG emissions across the supply chain. By engaging their suppliers in the same sustainability conversations, Nestlé extends EPR accountability upstream and deepens alignment with corporate climate goals.

Unilab leads the *kNOw More Plastics* campaign—an internal and external IEC initiative that aims to educate employees, consumers, and communities about the life cycle of plastics, proper disposal, and sustainable alternatives. The campaign uses online modules, visual infographics, and community roadshows to embed plastic literacy in day-to-day behavior.

Both Shell and Unilab institutionalize sustainability education through their annual *Sustainability Week*. The campaign mobilizes employees across departments and locations to participate in learning activities, community cleanups, and circularity workshops. Shell also collaborates with Pilipinas Shell Foundation Inc. (PSFI) to conduct fireside talks on plastic circularity and EPR for their employees and partner stakeholders, inviting partners such as Auditors and representatives from PCX to lend their expertise for the talks.

Internally, Shell delivers staff learning sessions on key environmental frameworks, including renewable energy, planetary boundaries, water circularity, and EPR. Notably, these educational efforts are extended to the company's board of directors and senior leadership, with focused sessions on carbon, water, and plastics to cultivate an organizational culture that prioritizes environmental stewardship and respects planetary limits.

Similarly, Human Nature has taken steps to inform and involve its employees in their EPR program. They educate their employees on what EPR is, what it costs, what steps are being taken, and empower them to participate in combating plastic pollution through their employee *balik-bote*¹¹ program. In this program, Human Nature collects PET bottles from its employees who receive a small incentive in return. This program has observed a positive effect in workplace culture, and has resulted in employees actively participating and even going out to their own communities to do collection. In a year, Human Nature collected 9MT from just this collection program, which went towards the diversion of their rigid plastic footprint for EPR compliance.

These campaigns help sustain an internal culture of stewardship while also signaling corporate alignment to EPR principles.

Why it works:

- Builds internal and external alignment with EPR principles
- Equips employees, LGUs and suppliers with actionable knowledge and tools
- Elevates awareness into structured action across multiple touchpoints
- Creates ripple effects from enterprise-level education to community impact

V. Recommendations and Conclusion

Now in its fourth year of compliance, there are already several value chain members such as Obligated Enterprises, Producer Responsibility Organizations, Collectives, and Waste Diverters, who are going beyond compliance. They demonstrate willingness and desire to go above what is required, even at the risk of increased cost or lower competitive advantage, in order to increase their environmental and socio-economic impact. While this report is meant to highlight current implementation strategies, it is also worthwhile to highlight the learnings that could be applied to a bigger or national scale.

In general, there is a need for clear impact measurement for initiatives and programs. Majority of the shared practices in this report are qualitative in nature, and there needs to be better quantification of impact in order to have direct links to the national goals and targets.

¹¹ Translates to: Glass bottle return

A. Recommendations for Data Management, Monitoring, and Reporting Systems

Several OEs, PROs, and Waste Diverters are already implementing an EPR Monitoring and Reporting System within their own EPR Programs. While this is currently a necessary step in the absence of uniform standards, this may not be the most scalable approach. It is important for policymakers to be aware of and continue assessing current practices and strategies that may be **adopted into national standards**. This also incentivizes the first movers and pioneers, or those already going beyond compliance as this levels the playing field among industries.

It is recommended that the Philippine government develops or applies a national standard that follows **robust, transparent and accountable guidelines for plastic waste recovery and diversion certificates such as plastic credits**. The national standard should contain the relevant definitions, qualification, issuance, verification, reporting, and governance of plastic credits and projects/ waste recovery and diversion activities within the EPR system to ensure the integrity, traceability, and transparency of the results and impacts. This would also ensure that the **funds derived from plastic credits and EPR are utilized to support the waste management sector, including its workers, and the country's transition to a circular economy in the long term** [18].

Currently, DENR is finalizing the EPR Procedural Manual (targeted to be published within 2026 and implemented for the compliance year 2026 onwards), which may serve to address the gaps in mechanisms and standards. **Clearer standards can improve both compliance of the producers**, as well as enhance the impact and move the country closer to the goals of EPR.

The first phase of a national registry of EPR programs is currently in beta testing. It is important that the efforts are continued as there is a level of transparency, accountability, and public awareness that needs to be met by the EPR system in order to establish credibility and reliability. It is recommended that, at a minimum, there should be a **publicly accessible registry of waste recovery and diversion certificates used for compliance (and voluntary) purposes**. This can serve as a safeguard against double counting/selling and potential corruption throughout the value chain, leading to increase of public trust in the system, and serve as an additional layer of third-party validation and verification [18]. The **inclusion of auditing requirements** within the EPR system demonstrates the Philippines' desire for integrity in data and reporting. In 2024, the DENR published interim guidelines on reporting and auditing, and is still developing more comprehensive and uniform standards for the same, as required by the EPR law. The government is working with its stakeholders to ensure that the uniform standards will be as all-encompassing and clear as possible.

These standards would, at a minimum, contain a standardized compliance auditing manual for the EPR Act of 2022 and a system for the accreditation of Independent Third-Party Auditors [18].

OEs, PROs, and other stakeholders are also hoping to see **further guidance within the uniform standards for report structure and requirements** — including requirements tailored and defined to the type of reporting entity (OE/ PRO/ Collective), and **further elaboration on acceptable waste diversion certificates and auditing of such**. This creates a trustworthy and credible system, ensuring fairness among industry and competitors and enabling the measurement and evaluation of true progress towards the objectives of EPR.

B. Recommendations for Social Inclusion

Overall, the strategies presented in this report show that social inclusion in EPR is not simply a moral imperative but a strategic pathway to compliance, traceability, and systems change. ALLWIES has recommended the scaling of community-based programs for EPR through a **conversation between the DENR and the Employers Confederation of the Philippines (ECOP)**, which many OEs are members of.

As the EPR system in the Philippines aims to recognize and integrate the Informal Waste Sector, several recommendations were brought forth by stakeholders interviewed:

- Informal Waste Sector integration also requires **Local Government integration into EPR**. LGUs are in the best position to establish Material Recovery Facilities (MRFs), collection centers, and local aggregation points. LGUs through partnerships, and by exercising their own mandates, can invest in or co-finance the infrastructure needed to formalize and stabilize waste collection in their locality and subsequently, in the country.
- **Livelihood programs targeting IWWs must align with the National Advocacy Plan for the Informal Waste Sector Integration (NAPSI) and include mandatory orientation and support for Occupational Safety and Health (OSH) compliance**. Given the health risks of waste work, integrating OSH safeguards ensures equitable participation.
- Empowered waste workers are entrepreneurs. Informal Waste Workers need support to establish community-led businesses that they co-own and manage. These enterprises should be supported not just with infrastructure but with **training on entrepreneurship, financial literacy, and business incubation**, in partnership with agencies like the Department of Trade and Industry (DTI) and the Department of Science and Technology (DOST). Support should also include **access to appropriate technologies and links to post-recycling markets** that will enable IWWs to produce and sell their own upcycled or recycled goods.
- **Support needs to be accessible**. While support programs exist, they are inaccessible to many IWWs. For instance, most livelihood opportunities require high school diplomas which most IWWs do not possess. Other barriers faced by IWWs in accessing support include the lack of documentary requirements such as IDs which they typically have trouble obtaining. Support for the IWS needs to start with

connecting them to basic services and enabling them to acquire proper documentation via provided templates and capacity building.

- **Clear incentives that align with social inclusion should be established.** For instance, offering tax deductions or enhanced credit rates for waste processed through Informal Waste Sector engagement can bolster compliance and effectiveness of the EPR. Such incentives will encourage OEs to leverage the Informal Waste Sector's capacity, supporting a more inclusive, efficient recycling and waste management system. Additionally, **establishing cooperatives and formal employment opportunities within the EPR system** can provide a structured pathway for incorporating informal workers. This would include capacity-building for the marginalized sector, making sure that these communities are fully informed about the law and their opportunities. These measures not only ensure that all packaging is collected, including low or no-value materials, but also facilitate the transition of informal workers to more secure and recognized roles, thus fostering a truly inclusive circular economy. [18]
- Alternative recycling may not be considered as circular as recycling, it does offer benefits in terms of social impact and inclusion of communities and consumers. **Projects that seek to involve the community or its consumers may also serve as a catalyst for behavior change.** Alternative recycling also **assigns value to non-commercially recyclable materials** and may be seen as an option for increased circularity, while more circular infrastructure is still lacking. It offers an avenue for **MSMEs to participate in and earn through EPR**, while creating purpose for otherwise discarded waste.
- **Poverty-alleviating programs must be tailored to IWWs.** Programs that support low-income households are often inaccessible to IWWs. This includes the *Pantawid Pamilyang Pilipino Program (4Ps)*, a Conditional Cash Transfer program by the Department of Social Welfare and Development (DSWD), and the *Tulong Panghanapbuhay sa Ating Disadvantaged/Displaced Workers (TUPAD)*, a Department of Labor and Employment (DOLE) led program providing short-term work such as street-sweeping to informal workers. EPR has opened up opportunities to design support programs that can be targeted to specific IWS needs.
- **Consultations with the IWS to inform EPR and policy improvement.** The IWS are the ones on the ground performing WACS for LGUs, sorting through MRFs, and working to divert waste from landfill. Their insights would be valuable in conversations around EPR as it matures in the Philippines. While IWWs have limited knowledge of EPR, the researchers found that when provided with even minimal explanations, the workers understand at a deep level the implications of the law on the country's solid waste management. They express appreciation of how EPR or similar laws have increased the value of flexible plastics, how it has broadened the materials available for their livelihood, and how covering more materials would enable them to earn more while helping increase recycling and reduce reliance on landfills.
- **Gender-based support should also be prioritized.** Women are expected to be in charge of the household and childcare. This limits their time to work and to earn. The

majority of the interviewed women IWWs have cited the need for childcare support and support for education.

The initiatives highlighted in this report are currently voluntary—primarily driven by corporate social responsibility efforts, global (corporate) mandates, or organizational advocacy. However, as long as these efforts remain optional, social inclusion programs are likely to remain limited in scope and unevenly implemented. To achieve broader impact and scalability, a more structured and strategic approach is essential—one that is supported by clear incentives and enabling mechanisms.

C. Recommendations for Upstream and Midstream Measures

Upstream interventions offer long-term, systems-level impact that must become widespread and implemented at larger scales for EPR to achieve its goals. While many OEs have made strides in reducing plastic components, incorporating recycled content, and piloting refill solutions, **broader adoption will require policy alignment and market incentives.** There needs to be **institutionalized design-for-recycling guidelines, incentivize the use of post-consumer recycled (PCR) content, and reform regulations to enable refill and reuse models.** These efforts should be **supported by consumer behavior change campaigns and inter-industry collaboration on packaging R&D** to ensure upstream innovations are commercially viable and widely adopted.

Further actions to help businesses balance economic viability with sustainable practices is to make this shift from ‘encouraging’ to ‘mandating’ the inclusion of recycled content. A **mandate on the usage of recycled content** could drive market adjustments by creating a market demand that supports the economics of recycling infrastructure without direct financial input from the government. While there is currently a limited number of local suppliers for recycled resin, leading to potential monopolies and increased costs, setting a mandate would encourage new entrants into the market and foster competition. This approach would further reduce the price disparity between recycled materials and virgin resin, making sustainability a more viable option for companies.

Several countries in the European Union (EU) implement eco modulation to incentivize redesign strategies. Eco modulation is the assignment of differentiating fees according to criteria that considers recyclability and inclusion of recycled content, among others. In Germany’s Packaging Ordinance, they require PROs to provide incentives for sustainable packaging design and to modulate EPR fees accordingly. Citeo, a PRO in France, has aggressive eco modulation criteria that applies a 10% fee increase to harder to recycle items, a 50% fee increase for mixed-material packaging, and a 100% fee increase for non-recyclable material and opaque PET with >4% mineral filler. As a result, the proportion of PET bottles with presence of aluminum reduced from 2.3% in 2012 to 1.1% in 2015. Further, the proportion of PVC bottles with impurities compared to clear PET bottles reduced from 0.3% in 2012 to 0.1% in 2015. [19]

EPR and plastics policy in countries under the EU, in the United States of America (USA), and Japan have imposed minimum recycled content for producers. The EU Packaging and Packaging Waste Directive has the most ambitious target of having a minimum 30% recycled content in all single-use plastic bottles by 2030. Early evidence suggests that mandatory recycled content increases the cost of recycled plastics in the short-term, and eventually stabilizes to compete with virgin plastic resin. [20]

It is important for policy to consider the effect that recycled content may have on the mechanical recyclability of a product or packaging. Eco modulation and mandatory recycled content policies must then go hand-in-hand. Governments such as the state of California, eco-modulate fees on the basis of recycled content, but requires that recycled content does not disrupt the potential for further recycling. [21]

The Philippines may also look towards similar solutions and frameworks such as eco modulation and mandatory recycled content to steer EPR programs into upstream strategies at scale. This would require taking stock of current recycling infrastructure, feedstock, gaps, and targets.

OEs implementing refill and reuse programs with sari-sari¹² stores could also receive **financial incentives to boost consumer participation**. These incentives (e.g. tax breaks, subsidies, or grants) would help offset the costs of these programs and enhance public engagement by educating consumers on the benefits of refill and reuse programs.

To expand these efforts and encourage similar initiatives, it is essential to **establish clear guidelines on how these activities can count towards EPR compliance** and to **provide capacity-building for OEs to implement effective upstream strategies**. There is a need for guidance on the reduction of an OE's footprint through the deployment of upstream strategies such as refilling, use of recycled content, shifting to a more commercially recyclable plastic, or to bioplastics¹³ and alternatives with better environmental impact as evidenced by environmental assessments. Detailed mechanisms for crediting these activities will encourage innovation and continuous improvement as OEs strive to meet and exceed EPR requirements.

Fortunately, the EPR law enables future developments in this area through its IRR's provision on EPR sustainability collaboration wherein OEs, Collectives, and PROs may co-establish systems, standards, rules, or guidelines to make the law more effective, efficient, and

¹²Translates to: Variety stores - small community based stores run by micro or small entrepreneurs that function as a retail store in a community, usually selling small quantity SKUs such as sachets.

¹³PCX Solutions does not express a positive or negative position on bioplastics, their suitability as a replacement for conventional plastics, or their long-term environmental impacts. The views presented herein are based solely on feedback gathered from consulted stakeholders. As with best industry practice, comprehensive life cycle assessments are critical to decision making on alternatives. The recommendation is intended to encourage policymakers to provide clearer definitions, guidance, and regulatory frameworks for bioplastics and potential alternatives, including their implications for plastic footprint accounting under Extended Producer Responsibility (EPR) schemes.

sustainable. Moving forward in this direction can catalyze industry-wide adoption of sustainable practices [18].

D. Conclusion

The strategies in this report offer a valuable reference for policymakers, industry leaders, and other EPR stakeholders. It is encouraging to see OEs, PROs, Collectives, and Waste Diverters taking bold steps beyond compliance—driven by a commitment to generate greater environmental, social, and economic impact. Stakeholder implementation showcase how transparency, innovation, and inclusivity can be embedded within a dynamic and evolving policy landscape— through efforts such as robust data management systems, upstream and midstream strategies, socially inclusive community partnerships and localized waste diversion models. These early efforts demonstrate that effective regulation, combined with community-driven solutions, can deliver impact.

While significant progress has been made—especially in laying the groundwork for downstream interventions—key challenges remain. As the EPR continues to mature, the challenges ahead lie in coordinating overlapping efforts of stakeholders, integrating the local government and Informal Waste Sector, and scaling infrastructure and upstream interventions to enable long term systematic change. Addressing these challenges will require stronger and continued collaboration, enduring public-private partnerships, and sustained investment in both systems and communities.

With the right enabling environment—including clear and consistent standards, supportive financing, and inclusive policies—the Philippine EPR system can not only meet its compliance goals, but also catalyze a truly circular and inclusive economy, and inspire other countries which are similarly hard hit by the plastic crisis.

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Annex 1: Stakeholders consulted

Producer Responsibility Organizations:

1. Zedrick Avecilla, Program Director, and Jess Reyes, Director, Philippine Alliance for Recycling and Materials Sustainability (PARMS)
2. Roland Cruz, General Manager, Greencycle Innovation Corporation
3. Elvin Uy, Executive Director and Judy Ilagan, Administrative Assistant, Philippine Business for Social Progress
4. Athalie Reyes, Senior Manager, EPR & Projects, PCX Solutions

Waste Diverters:

1. Anna Dia A. Cruz, Commercial Manager, HOLCIM Philippines and Geocycle Philippines¹³
2. Roland Cruz, General Manager, Greencycle Innovative Solutions
3. Erica Cardoso, Managing Director and Bianca Denise Pascual, Senior Partnership Officer, Evergreen Labs
4. Danica Reyes, Royal Rainbow Recycling
5. Kevin Adrian Go, Toplun Plastic Corporation
6. Ted Guayco, Business Development Manager, Plastic Bank
7. Marvin Fernandez, Senior Program Manager, Aling Tindera (Friends of Hope, Inc.)

Obligated Enterprises and Collectives:

1. Olaf Miguel Bautista, Sustainability Manager, Nestlé Philippines Inc.
2. Christopher Ilagan, Corporate Affairs Lead, Pepsi Cola Products Philippines Inc.
3. Atty. Ma. Kathryn Joy Q. Perez-Ortega, Corporate Strategist, Unilab, Inc.
4. Sharmaine Tolentino, Regulatory Officer, and Diane Basino, Category Manager, Human Nature Inc.
5. Mary Paz Fernandez, Group Environment Manager, Pilmico Foods Corporation

Informal Waste Sector:

1. Susanita G. Tesiorna, President, Alliance of Workers in the Informal Economy/Sector (ALLWIES)
2. Dan Ezekiel Martin, Officer-in-Charge, Municipal Environment and Natural Resources Office of Marilao, Bulacan
3. Norma Borja, IWW, Red Antz
4. Maila Sabangan, IWW, Red Antz
5. Yolanda Cadelo, Smokey Mountain
6. Luzviminda Gatpolintan, Smokey Mountain
7. Rena Flores, BASECO
8. Jason Victorino
9. Cecille Rosagaran, Happyland
10. Arnel Ibanez, Happyland

¹³ Geocycle Philippines is a project under the company HOLCIM Philippines. For this report, they were represented by one person, who was interviewed both as an Obligated Enterprise (HOLCIM) and as a waste Diverter (Geocycle)

Annex 2: Consultation questionnaires

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| CONSULTATION GUIDE FOR PRODUCER RESPONSIBILITY ORGANIZATIONS |
| Introduction |
| <p>This consultation will assess the current status of EPR compliance and implementation, identify opportunities for improving EPR plans and processes, and facilitate knowledge sharing of practices among Producer Responsibility Organizations (PROs). The results of this consultation will support the DENR in assessing EPR plans submitted by enterprises in the food and beverage sector as well as assessing results achieved by enterprises in compliance with their proposed EPR plans.</p> |
| <p style="text-align: center;">PRO Profile</p> <ul style="list-style-type: none"> ● Company name: ● PRO since: ● Number of OEs under PRO: |
| Question 1: How does your organization support OEs in meeting EPR obligations? |
| Question 2: What challenges have you encountered in ensuring OEs meet their EPR targets? |
| Question 3: How do you address non-compliance or underperformance? |
| Question 4: What steps are taken by your organization to guarantee the integrity of data reported by OEs? |
| Question 5: How do you manage and verify the services provided by waste management companies and other service providers? |
| Question 6: What process do you follow for tendering and contracting service providers for waste collection, sorting, and recycling or processing? Describe your data tracking and management system. |
| Question 7: What motivates companies to go beyond minimum compliance (e.g., brand reputation, cost savings, pressure from PROs)? |
| Question 8: Describe any upstream measures included in your EPR program. |
| Question 9: How do you collaborate with DENR in reporting and monitoring compliance? What additional support or policy changes are needed to improve collaboration? |
| Question 10: How has your organization adapted its strategies and operations over the years to adapt to market changes, emerging trends, or align with the EPR system’s requirements? |

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| <p>CONSULTATION GUIDE FOR WASTE DIVERTERS</p> |
| <p>Introduction</p> |
| <p>This consultation aims to evaluate the current state of EPR compliance and implementation, identify opportunities for enhancing EPR plans and processes, and foster knowledge-sharing of practices among Collectives, Obligated Enterprises (OEs), and Waste Diverters. The insights gathered from this FGD will support the Department of Environment and Natural Resources (DENR) in reviewing EPR plans submitted by enterprises in the food and beverage sector, as well as assessing the outcomes achieved by enterprises in meeting their EPR commitments.</p> |
| <p>Questionnaire</p> |
| <p style="text-align: center;">Waste Diverter profile</p> <ul style="list-style-type: none"> ● Waste diversion services provided ● Location/scope of operations ● Type of materials accepted ● Volume of waste handled on average (annual or monthly) ● Source of materials |
| <p>Question 1. Are you currently engaged in any EPR-related programs, partnerships, or contracts?</p> |
| <p>Question 2. Do you work with LGUs, junk shops, waste pickers, businesses, or direct consumers?</p> |
| <p>Question 3. What are the key challenges you face in waste diversion operations?</p> |
| <p>Question 4. What kind of documentation or tracking system do you maintain to monitor material volumes at different stages (e.g., collection, sorting, recycling)?</p> |
| <p>Question 5. How does your data management system ensure transparency in tracking and reporting diverted waste?</p> |
| <p>Question 6. Have you established any processes for verifying or auditing your waste diversion data?</p> |
| <p>Question 7. When reporting to clients, partners, or government agencies, what kind of evidence or reports do you provide to show that waste has been properly diverted and processed? (e.g., volume reports, processing certificates, photos, batch numbers)</p> |
| <p>Question 8. How are the funds or support you receive from EPR programs being utilized (e.g., operational improvements, equipment, salaries, benefits for employees)?</p> |

| CONSULTATION GUIDE FOR OBLIGED ENTERPRISES |
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| Introduction |
| <p>This consultation will assess the current status of EPR compliance and implementation, with a particular focus on upstream measures to reduce plastic waste and initiatives that promote social inclusion and community engagement. The results of the interview will support the DENR in assessing EPR plans submitted by enterprises in the food and beverage sector as well as assessing results achieved by enterprises in compliance with their proposed EPR plans. The Chatham House rules will apply for the consultation unless your organization explicitly expresses the desire to be disclosed as a source.</p> |
| <p>Company profile</p> <ul style="list-style-type: none"> • Company name: • Industry/sector: • Date/year of OE registration: |
| <p>Question 1: Describe your company’s EPR plan, its objectives, components, and specific strategies for reducing plastic waste.</p> |
| <p>Question 2: Describe internal processes or structures in place to monitor EPR compliance within your organization.</p> |
| <p>Question 3: What challenges have you faced in meeting the EPR targets, particularly related to collection and recycling rates?</p> |
| <p>Question 4: What measures has your organization implemented to reduce plastic use in product design and packaging?</p> |
| <p>Question 5: How do you engage suppliers in adopting sustainable practices related to plastic reduction?</p> |
| <p>Question 6: Have you explored or adopted alternative materials to plastic in your products or packaging? How do you assess the environmental impact of these alternative materials?</p> |
| <p>Question 7: Describe other upstream waste reduction strategies your organization has implemented or is implementing. What positive impact, if any, has this produced for your organization?</p> |
| <p>Question 8: Have you partnered with community-based organizations, cooperatives, or Local Government Units to support plastic waste management efforts or in the implementation of your EPR initiatives? If yes, please describe these partnerships.</p> |
| <p>Question 9: Do you conduct community awareness or education campaigns on plastic waste management? If yes, what topics are covered, and who are the target audiences?</p> |
| <p>Question 10: What improvements or additional support could help strengthen social inclusion and community engagement in your EPR efforts?</p> |

| CONSULTATION GUIDE FOR COLLECTIVES |
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| <p>Introduction</p> |
| <p>This consultation will assess the current status of EPR compliance and implementation, with a particular focus on upstream measures to reduce plastic waste and initiatives that promote social inclusion and community engagement. The results of the interview will support the DENR in assessing EPR plans submitted by enterprises in the food and beverage sector as well as assessing results achieved by enterprises in compliance with their proposed EPR plans. The Chatham House rules will apply for the consultation unless your organization explicitly expresses the desire to be disclosed as a source.</p> |
| <p>Collective profile</p> <ul style="list-style-type: none"> ● Collective name: ● Industries represented: ● Date/year established: ● Number of OEs in Collective: |
| <p>Question 1: What are the key activities and initiatives undertaken by your Collective to fulfill EPR compliance?</p> |
| <p>Question 2: How does your Collective develop and execute its EPR plan?</p> |
| <p>Question 3: How does your Collective engage with member OEs, waste management partners, recyclers, and other stakeholders?</p> |
| <p>Question 4: What measures has your organization implemented to reduce plastic use in product design and packaging?</p> |
| <p>Question 5: How do you engage suppliers in adopting sustainable practices related to plastic reduction?</p> |
| <p>Question 6: Have you explored or adopted alternative materials to plastic in your products or packaging? How do you assess the environmental impact of these alternative materials?</p> |
| <p>Question 7: Describe other upstream waste reduction strategies your organization has implemented or is implementing. What positive impact, if any, has this produced for your organization?</p> |
| <p>Question 8: Have you partnered with community-based organizations, cooperatives, or Local Government Units to support plastic waste management efforts or in the implementation of your EPR initiatives? If yes, please describe these partnerships.</p> |
| <p>Question 9: Do you conduct community awareness or education campaigns on plastic waste management? If yes, what topics are covered, and who are the target audiences?</p> |
| <p>Question 10: What improvements or additional support could help strengthen social inclusion and community engagement in your EPR efforts?</p> |

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| <p>Talaang Tanong para sa Pag-unawa sa Buhay at Gawain ng mga Manggagawa sa Basura <i>Questionnaire for Informal Waste Workers</i></p> |
| <p>Panimula at Layunin <i>Introduction and Objectives</i></p> |
| <p>Ang konsultasyong ito ay ginagawa upang mas maintindihan ang karanasan, pangangailangan, at mahalagang ambag ng mga manggagawa sa basura at mga komunidad na apektado ng problema sa basura. Ang inyong mga sagot ay makakatulong sa pagbuo ng mas maganda at makatarungang mga programa at patakaran, lalo na sa mga may kaugnayan sa batas na <i>Extended Producer Responsibility</i> (EPR).</p> <p>Ang inyong mga kasagutan ay makatutulong upang suriin ang kasalukuyang kalagayan ng pagpapatupad ng batas na EPR, lalo na sa mga inisyatibo ng mga kumpanya na nagtataguyod ng inklusibong partisipasyon sa mga komunidad.</p> <p><i>This consultation is being conducted to understand the experiences, needs, and contributions of waste workers and the communities affected by the plastic pollution crisis. Your answers will help form a better and juster programs and policies, especially in relation to the EPR Law.</i></p> <p><i>Your answers will help determine the current state of EPR implementation, especially that of the initiatives of companies that foster inclusivity and community participation.</i></p> |
| <p>Impormasyon tungkol sa manggagawa <i>Worker Information</i></p> <ul style="list-style-type: none"> ● Pangalan ng indibidwal: <i>Name of Individual</i> ● Kasarian: <i>Gender</i> ● Edad: <i>Age</i> ● Pangalan ng komunidad o kooperatibang kinabibilangan: <i>Name of community or cooperative that you are a part of and representing</i> |
| <p>1. Maari mo bang ikuwento kung ano ang karaniwang gawain mo sa pangangalap ng basura? Anong mga uri ng materyales ang kadalasang nahahawakan mo at saan ito nagmumula? <i>Can you share your daily activities in relation to waste collection? What materials do you often encounter and where do these come from?</i></p> |
| <p>2. Ano naman ang mga hamon kaugnay ng kaligtasan, kalusugan, o pagkakaroon ng maayos na kita pagdating sa trabaho? <i>What are the challenges in relation to safety, health, or earnings?</i></p> |
| <p>3. Paano ka kumikita mula sa iyong gawain sa basura? Kanino mo binebenta ang mga materyales? <i>How do you earn from your waste management activities? Who buys the materials/ wastes you collect?</i></p> |
| <p>4. Paano nakakatulong ang pagtatrabaho kabilang ng isang kooperatiba? <i>How does working within a collective help you in your work?</i></p> |

5. Ano ang maibabahagi mong kaalaman tungkol sa batas na Extended Producer Responsibility (EPR) sa Pilipinas o mga programang kaugnay nito ng mga kumpanya?

What do you know about the EPR law or regarding the EPR programs of companies?

6. Sa iyong palagay, kinikilala at pinahalalagan ng lokal na pamahalaan o ng mga pribadong kumpanya ang iyong hanapbuhay? Bakit o bakit hindi?

In your opinion, do the LGUs/ private companies recognize and value your livelihood? Why or why not?

7. Nakasali ka na ba sa alinmang programa ng pamahalaan, NGO, o pribadong kumpanya na tumutulong sa mga manggagawa sa basura o sa recycling? Maari mo bang ilahad o pangalanan ang mga ito?

Have you participated in any programs by governments, NGOs, or private companies that aim to help waste workers or increase recycling? Can you name these programs that you have participated in?

8. Aling mga programa o suporta ang pinaka-nakatulong sa'yo o sa inyong grupo? (Hal. kagamitan, ID system, pinansyal na ayuda, health coverage, access sa junk shop)

Which programs or forms of support do you find most helpful (or useful) to your group? (For example, tools, ID, financial aid, health coverage, access to junk shops, etc.)

9. Anong klaseng mga programa naman ang madalas na ini-aalok sa inyo na hindi gaano napakikinabangan o hindi gaano nakakatulong?

What type of programs have you been asked to participate in but you have found not useful or unhelpful?

10. Kung nais ng mga kumpanya na makipagtulungan sa mga manggagawa o komunidad na katulad ng inyo para sa batas na EPR, paano sila dapat makipag-ugnayan sa paraang makatarungan at kapaki-pakinabang?

If companies want to cooperate with the waste workers or community members like you for EPR, how should they go about it in a just and useful way?



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