## **Deloitte.**

## LandichoAbela&Co.



# Plastic Credits and Auditing

Promoting transparency and accountability in the Circular Economy

18 June 2025

This is not an ADB material. The views expressed in this document are the views of the author/s and/or their organizations and do not necessarily reflect the views or policies of the Asian Development Bank, or its Board of Governors, or the governments they represent. ADB does not guarantee the accuracy and/or completeness of the material's contents, and accepts no responsibility for any direct or indirect consequence of their use or reliance, whether wholly or partially. Please feel free to contact the authors directly should you have queries.

## **Meet the Speaker**



Ma. Celina (Macy) Añonuevo Senior Manager, Deloitte Philippines Sustainability & Emerging Assurance 18+ years of experience in sustainability

#### **Current and past projects:**

- EPR Law Compliance
- Waste Management Standards Development
   and Training
- Decent work and responsible business conduct
- Sustainability Strategy and Framework
   Development



## AGENDA

What are plastic credits?

Who gets audited?

How do we audit plastic credits?

## I. What are plastic credits?



### **Plastic credits**

No universally accepted definition at present

"A **plastic credit** is a transferable unit representing a specific quantity of plastic that is avoided from use, collected and managed, or recycled."

- World Bank

References: Open Knowledge Repository

### How are plastic credits generated?

Plastic credits are generated through upstream and downstream activities. All plastic credits available and sold (at present) are from downstream activities.

#### **Upstream activities**

Plastic avoidance [still conceptual]

#### Downstream activities [all operational]

- Collection from the environment (cleanups, etc.)
- Diversion from landfills and towards coprocessing or waste-to-energy
- Diversion from landfills and towards mechanical recycling



Photo: LGU waste in storage prior to shredding and co-processing



Photo: Manual removal of caps and labels on PET bottles prior to recycling

### Where do plastic credits fit into the circular economy?

Plastic credits are a financing tool that helps address funding gaps

- Help meet the financing gap for waste management
  - Financing gap of USD 28-40/ton for plastic waste collection services and USD 28-40/ton across plastic recycling value chains in the Philippines, Indonesia, Thailand, Vietnam, and China (Ocean Conservancy 2019).
- Incentivizes sustainable practices
- Provide a framework that is traceable and results-based
- Increased participation and recognition of the informal waste sector in waste management





Photo: Local eatery with recycled net bag specifically for collecting plastics

### What are the challenges facing plastic credits?

- No uniform standard in credits generation
- Varying levels of maturity and transparency of creditgenerating projects
- Varying prices of credits
  - Depends on type of plastic, diversion method, and location
- Possible double counting of credits
- Possible disincentive for plastic generators to reduce plastic usage because they can just "buy" compliance

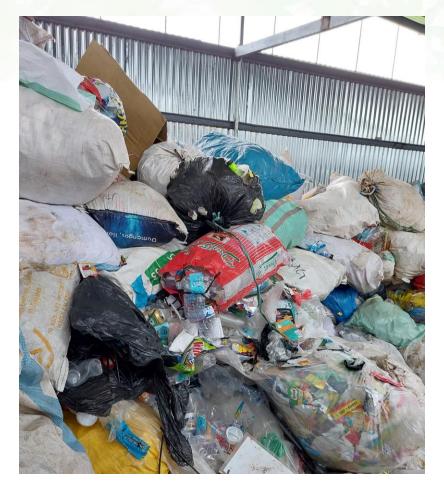
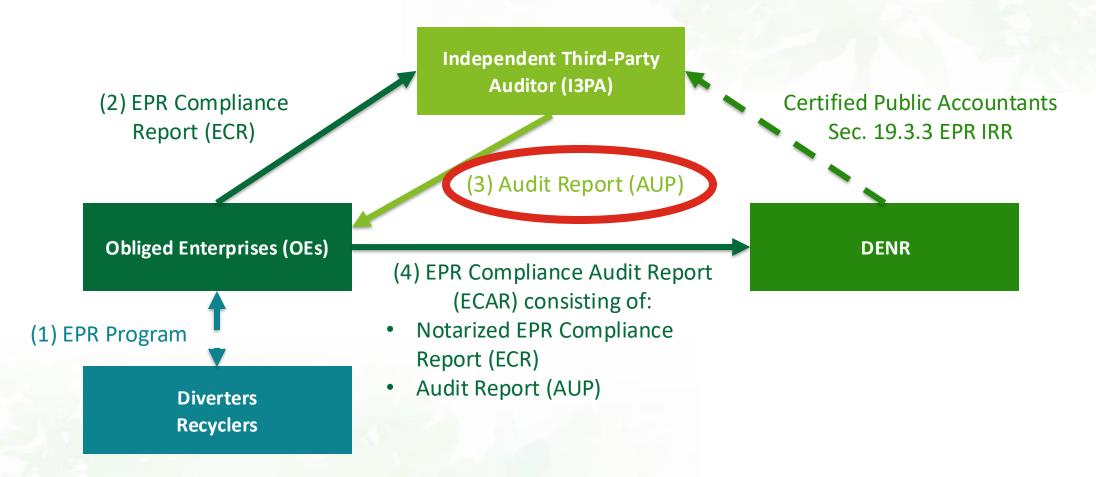


Photo: Collected plastic for final sorting

## II. Who gets audited?

### Audit requirements vary based on purpose and location

The Philippines' EPR Law's Compliance Reporting and Auditing System focuses on the Obliged Enterprises, rather than Diverters



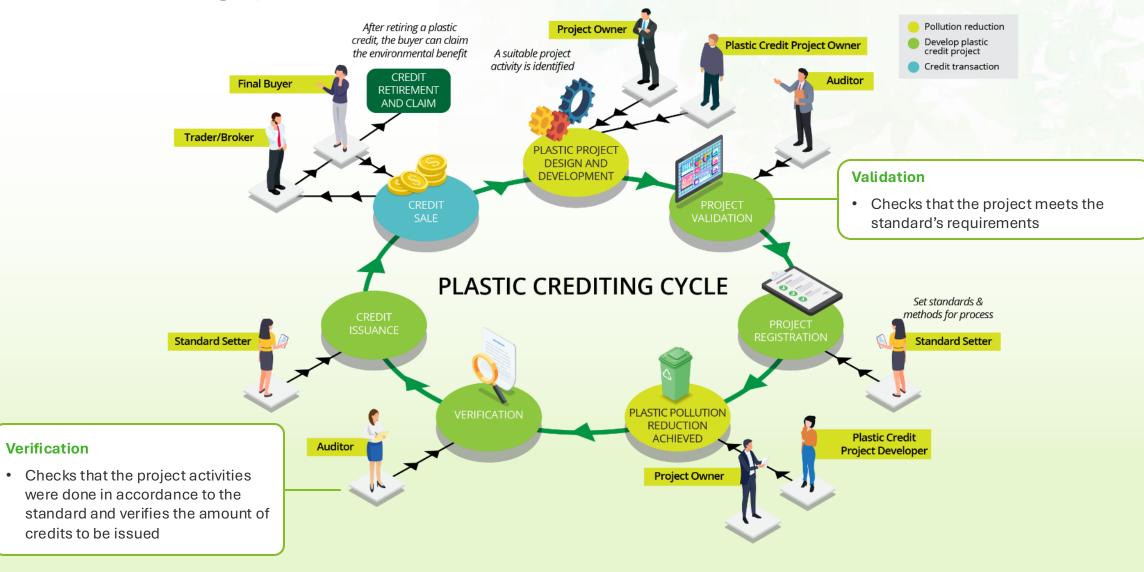
### Audit requirements vary based on purpose and location

For voluntary plastic credits, it's the waste diverters. For EPR programs that include plastic credits, it's still mostly the waste diverters.

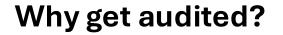
Countries with EPR	Waste diverters	Obliged Enterprises
UK	<ul> <li>Register with the Environmental Agency, with annual accreditation</li> <li>Audited by Environmental Agency (scheduled and surprise inspections)</li> </ul>	• Not audited
Brazil	<ul> <li>Audited by govt-accredited third-party auditors</li> </ul>	Not audited
India	<ul> <li>Register with Central Pollution Control Board</li> <li>Audited by CPCB-accredited third-party auditor starting 2023 (EPR started in 2016)</li> </ul>	• Not audited at present, but may be audited starting 2025 because there is now a target for recycled plastic usage
Philippines	<ul> <li>No DENR database for diverters</li> <li>Audit is voluntary; notarized certs are already acceptable</li> </ul>	<ul> <li>Audited by third-party auditor using DENR AUP</li> <li>Auditor may be any CPA</li> </ul>

References: Producer responsibility regulations - GOV.UK, Brazil reverse-logistics-for-packaging-brazils-epr-model\_2021\_case-study.pdf, UNPACKING EPRFOR PLASTIC PACKAGING IN INDIA: Navigating Challenges and Unlocking Opportunities on JSTOR, RA 11898 – Extended Producer Responsibility on Plastic Packaging Waste | Environmental Management Bureau

### **Plastic crediting cycle**



References: Open Knowledge Repository





References: Open Knowledge Repository



14

## Let's continue the conversation



#### Ma. Celina (Macy) Añonuevo

Senior Manager, Deloitte Philippines Sustainability & Emerging Assurance manonuevo@deloitte.com

#### **Our Team's Experience**

#### **Climate and Decarbonization**

- Climate Risk Assessment
- GHG Accounting
- Technical Advisory

#### **Sustainable Finance**

- ESRMS Advisory
- Sustainable Finance Policy

#### **ESG Reporting and Strategy**

- Sustainability Strategy
- Sustainability Reporting and Assurance
- IFRS S1 and S2 Compliance

• Diversity, Equity, and Inclusion Advisory

#### Sustainable Supply Chain

• Supply Chain Due Diligence

#### **Circular Economy**

- EPR Advisory
- EPR Audit
- Circular Economy Hub
   Development

## **Deloitte.**

## LandichoAbela&Co.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which is a separate and independent legal entity, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Bengaluru, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Mumbai, New Delhi, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo.

#### **About Deloitte Philippines**

In the Philippines, services are provided by Landicho Abela & Co., a duly registered professional partnership.

This communication contains general information only, and none of DTTL, its global network of member firms or their related entities is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication.

#### © 2025 Deloitte Philippines. All rights reserved.