



KEPRO

Kenya Extended Producer Responsibility Organisation
Collaboration | Commitment | Circularity | Community

KEPRO/01/07/01/fm/jo/SM

Dr. Mamo Boru Mamo, EBS
Director General
National Environment Management Authority (NEMA)
P.O. BOX 67839 - 00200
Nairobi, Kenya.



Dear Sir,

RE: Extended Producer Responsibility for Plastic Packaging Materials

Greetings from the Kenya Extended Producer Responsibility Organization (KEPRO).

We acknowledge receipt of your letter dated 30th September 2025, referenced REF/5/2/Vol. III, regarding the implementation of Extended Producer Responsibility (EPR) obligations under the Environmental Management and Co-ordination (Management and Control of Plastic Packaging Materials) Regulations, 2024.

As the designated EPR organization for manufacturers, importers, and users of plastic packaging materials, KEPRO is committed to ensuring full compliance with the provisions outlined in Sections 15 and 16 of the Regulations. In response to your request, we are pleased to submit the following:

- Harmonized EPR Plan - Outlines our consolidated strategy for supporting the collection, reduction, re-use, recycling, recovery, treatment, and safe disposal of plastic packaging materials.
- Waste Transport Schedule - Provides a detailed overview of our collection locations, timelines, and transportation arrangements for plastic waste evacuation, recycling, and disposal activities conducted on behalf of our members.

The estimated quantities of plastic packaging materials released into the market by our members in 2024 amount to approximately 23,000 tons, with countywide distribution coverage. The mode of the distribution network includes through production entities, direct consumers, factory-owned distribution, agent distribution, retail collection, or a mixture thereof, as indicated in the EPR Plan attached. Being a collective scheme, our members will further provide product-specific submissions in line with the registration requirements.

The attached documents will provide the clarity required in our implementation approach. For clarifications or inquiries, please contact us at [+254-795-177-205](tel:+254-795-177-205) or via email at info@kepro.co.ke.

Yours sincerely,

James Odongo
Chief Executive Officer (CEO),
Kenya Extended Producer Responsibility Organization (KEPRO)

Copy to:

1. Dr. Ayub Macharia, Director of Enforcement
2. Mr. David Ongare, Compliance Director



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KENYA EXTENDED PRODUCER RESPONSIBILITY ORGANISATION (KEPRO)

EXTENDED PRODUCER RESPONSIBILITY (EPR) PLAN FOR PLASTICS PACKAGING MATERIALS

OCTOBER 2025



PRO DETAILS

NAME OF PRO: Kenya Extended Producer Responsibility Organization (KEPRO)

ADDRESS: P.O Box 30225-00100, Nairobi

CONTACT PERSON: James Odongo - Chief Executive Officer (CEO)

CONTACT NUMBER: 0795177205

EMAIL: info@kepro.co.ke

CLUSTER & PRODUCT DESCRIPTION: Packaging for non-hazardous products (plastics and other material fractions)

DISTRIBUTION COVERAGE: Countrywide (47 counties)

Executive Summary

The scheme will be implemented by the registered Producer Responsibility Organization (PRO), Kenya Extended Producer Responsibility Organization, of registration number CLG-K6F5L. KEPRO is an autonomous body established by producers and is a not-for-profit company with public benefit status. It is managed by a board of directors comprised of value chain stakeholders and adheres to the Companies Act 2015. This Extended Producer Responsibility (EPR) Plan has been developed to provide a structured approach for waste management in Kenya. It outlines KEPRO's strategies for collection, recycling, producer compliance, and financial sustainability for non-hazardous plastic packaging products over the next four years. The plan is aligned with the Environmental Management and Coordination (Management and Control of Plastic Packaging Materials) Regulations, 2024, ensuring adherence to legal frameworks in Kenya. KEPRO has successfully:

- Established partnerships with key stakeholders, including government agencies, recyclers, and waste collectors.
- Implemented structured waste collection and material recovery programs.
- Developed consumer awareness campaigns to promote waste segregation and responsible disposal.

Based on the foregoing, over the next 4 years, KEPRO will heavily invest in the following key priority areas;

1. Consumer Sensitization and Awareness
2. Training and capacity building of waste service providers/CBOs and other relevant actors
3. Providing support in the establishment of aggregation points/collection centres
4. Piloting of Material Recovery Facilities (MRFs) and other forms of infrastructure
5. Improving recycling rates through the payment of subsidies to recyclers
6. Increasing collection rates by investing in waste collection support, e.g., segregation at source initiatives, PPE distribution, waste categorization surveys, etc.
7. Expand waste collection infrastructure across all 47 counties in Kenya
8. Ensure that all members (producers and importers) comply with the Sustainable Waste Management (EPR) Regulations of 2024
9. Invest in waste tracking technology to improve transparency and accountability

The 4-year EPR plan can be summarized as per the infographics below:

KEPRO 4-YEAR EPR Plan Summary

Table 1: This table provides a clearer roadmap for KEPRO's four-year EPR Implementation strategy

KEPRO 4-YEAR EPR PLAN						
OBLIGATION DESCRIPTION	PROPOSED ACTIVITIES	SCOPE	YEAR 1	YEAR 2	YEAR 3	YEAR 4
National Targets for Reuse, Recycling, and Disposal	Segregation at Source & Reverse logistics	Infrastructural support for segregation & take-back schemes	Pilot in 10 communities & identify key collection hubs	Execution in the initial 8 Counties Retailer & manufacturer/brand owner take-back	Execution in an additional 16 counties & expand logistics	Nationwide rollout
Safe Handling, Processing & Disposal	Health & Safety for WMOs	Protective gear and health for WMO actors	PPEs & Tools	PPEs & Tools, medical camps, Medical cover	PPEs & Tools, medical camps, SHIF, ablution blocks	Scaling up health and safety initiatives
Waste Collection & Recycling	Infrastructure - Collection Points, Pods, RVM	Support infrastructure	Collection Points	Buyback centers, Bailers, RVMs	Expansion of collection sites	Regional coverage
Digital & Tech Integration	Technology apps	Tech-enabled PRO	KEPROms	Waste Tracking Apps	MVDs Auditing Apps	Expansion of digital monitoring
Circular Economy	WMO Contracts	Contracts with WMOs	Contracts with Recyclers	Contracts with Aggregators	Contracts with Recyclers, Aggregators & Collectors	Contracts with Recyclers, Aggregators, Transporters
Consumer Awareness & Engagement	Public education & branding	Nationwide outreach	Awareness campaigns in 8 counties	Nationwide media campaigns and drives in 16 counties	Execution in the remaining 23 counties	Full consumer engagement & participation
EPR Compliance & Policy Support	Regulatory alignment	Work with policymakers & PROs	Initial policy framework discussions	Implementation of EPR compliance tools	Full integration with government regulations	National EPR compliance & penalties enforcement
Innovations in Recycling	New processing technologies	Adoption of cutting-edge recycling methods	Research on new methods	Pilot projects	Scale-up and industry integration	Region- adoption of best practices

Table of Contents

Executive Summary	2
KEPRO 4-YEAR EPR Plan Summary	3
List of Abbreviations	6
1.0 INTRODUCTION.....	7
1.1 Objectives of the EPR Plan.....	7
2.0 PURPOSE AND PRINCIPLES OF THE KEPRO EPR PLAN.....	8
2.1 Purpose.....	8
2.2 Principles of the EPR Plan	8
3.0 ABOUT KEPRO	9
3.1 Current Company Structure.....	9
3.2 KEPRO Board & Governance.....	9
3.3 Current Membership	10
3.4 KEPRO's Obligations.....	11
4.0 BASELINE FOR THE PRODUCTS AND PACKAGING HANDLED	12
4.1 Industry Baseline – KEPRO Members’ Packaging Trends.....	12
4.2 Packaging Waste Management Practices in Kenya.....	12
5.0 PROGRAM STRATEGIES	14
5.1 Plan for safe handling, processing, and disposal of 100% equivalent volume of products declared by the producer.....	14
5.2 Plan to meet national targets for reuse, recycling, or recovering operations and end-of-life management.....	14
5.3 Modulation of Extended Producer Responsibility Membership Fees and parameters based on environmental sustainability criteria.....	15
5.4 Programme on public awareness and consumer education	16
5.5 Eco-design standard operating procedure for the products handled by the scheme.....	16
5.6 Mechanisms for controlling banned or dangerous substances in products handled by the scheme.....	17
5.7 Plan or projection on training and capacity building of members and actors in the scheme.....	17
5.8 Plan to Deal with Legacy Waste.....	18
5.9 Model of financing the scheme, integrating financial flows to the entire value chain actors.....	18
6.0 DETAILED IMPLEMENTATION PLAN	19
6.1 KEPRO workplan with other counties	19
8.0 RISKS AND POTENTIAL CHALLENGES IN IMPLEMENTATION OF THE EPR PLAN.....	32
8.1 Risk Mitigation Framework.....	32
9.0 FINANCIAL PLAN.....	34
9.1 EPR Fee.....	34
9.2 EPR Fee Determination.....	34
9.3 EPR Fee Calculation	34

10.0 MONITORING, TRACEABILITY & COMPLIANCE VERIFICATION 36

10.1 *Monitoring of Producer Compliance*.....36

10.2 *Product Traceability System*36

10.3 *Inspections and Compliance Audits*.....36

10.4 *Reporting*.....36

11.0 ANNEXES 38

11.1 *2025 Budget*.....38

11.2 *2025 Workplan*.....40

List of Abbreviations

EPR: Extended Producer Responsibility

Long Term: Year 4 onwards

Medium Term: Within Years 3 and 4

MRF: Material Recovery Facility

NEMA: National Environment Management Authority

PRO: Producer Responsibility Organization

R&D: Research and Development

Short Term: Within Years 1 and 2

WMOs: Waste Management Operators

WSPs: Waste Service Providers

1.0 INTRODUCTION

Kenya's waste crisis is escalating due to urbanization, industrial growth, and shifting consumption patterns, with a significant portion coming from plastic packaging. Without effective recovery systems, waste accumulates in landfills, water bodies, and illegal dumpsites, posing environmental and health risks.

To address this, the Sustainable Waste Management Act, 2022, and the Environmental Management and Coordination (Management and Control of Plastic Packaging Materials) Regulations, 2024 mandate producers to take responsibility for their products' environmental impact. Section 15 of the Regulations requires all EPR schemes to submit an EPR plan to the National Environment Management Authority (NEMA) as part of the Plastics exemption application for Primary and Secondary Packaging.

In compliance, KEPRO, as Kenya's largest Producer Responsibility Organization (PRO) on packaging for non-hazardous products, has developed this 2025 to 2029 EPR Plan to ensure recovery, recycling, and responsible disposal of post-consumer packaging. Focusing on plastics packaging, the plan promotes a circular economy by enhancing stakeholder collaboration, financial sustainability, and recycling infrastructure, paving the way for a cleaner and more sustainable Kenya.

1.1 Objectives of the EPR Plan

The Kenya Extended Producer Responsibility Organization (KEPRO) has designed this comprehensive four-year EPR strategy (2025-2029) to achieve the following long-term goals:

- Develop an effective waste collection and recovery system that enables structured and efficient post-consumer packaging waste management across Kenya's 47 counties.
- Improve recycling rates through creating an enabling environment for investment in modernized recycling infrastructure, creating a sustainable value chain for recovered materials.
- Promote eco-design principles that encourage the adoption of biodegradable and recyclable materials by producers, reducing Kenya's dependence on non-recyclable packaging.
- Ensure compliance with EPR regulations through the implementation of strict monitoring and reporting frameworks that hold producers (members) accountable for their post-consumer waste management obligations.
- Encourage producer participation and stakeholder engagement by fostering collaboration among all strategic partners and value chain actors, including manufacturers, recyclers, waste collectors, policymakers, and consumers.
- Support economic empowerment and job creation by integrating informal waste pickers into structured waste collection and recycling programs.

2.0 PURPOSE AND PRINCIPLES OF THE KEPRO EPR PLAN

2.1 Purpose

The primary purpose of the KEPRO Extended Producer Responsibility (EPR) Plan is to establish a structured, accountable, and efficient waste management framework that ensures producers take responsibility for the end-of-life management of their products. This plan is designed to:

- Reduce environmental pollution by enhancing collection and recycling systems.
- Ensure compliance with national EPR regulations to achieve sustainability goals.
- Support a circular economy by promoting waste recovery, reuse, and recycling.
- Provide financial and technical support to Waste Management Operators (WMOs), inclusive of waste collectors, processors, and recyclers.
- Enhance consumer awareness on responsible waste disposal and segregation.

2.2 Principles of the EPR Plan

The KEPRO EPR Plan is guided by the following principles:

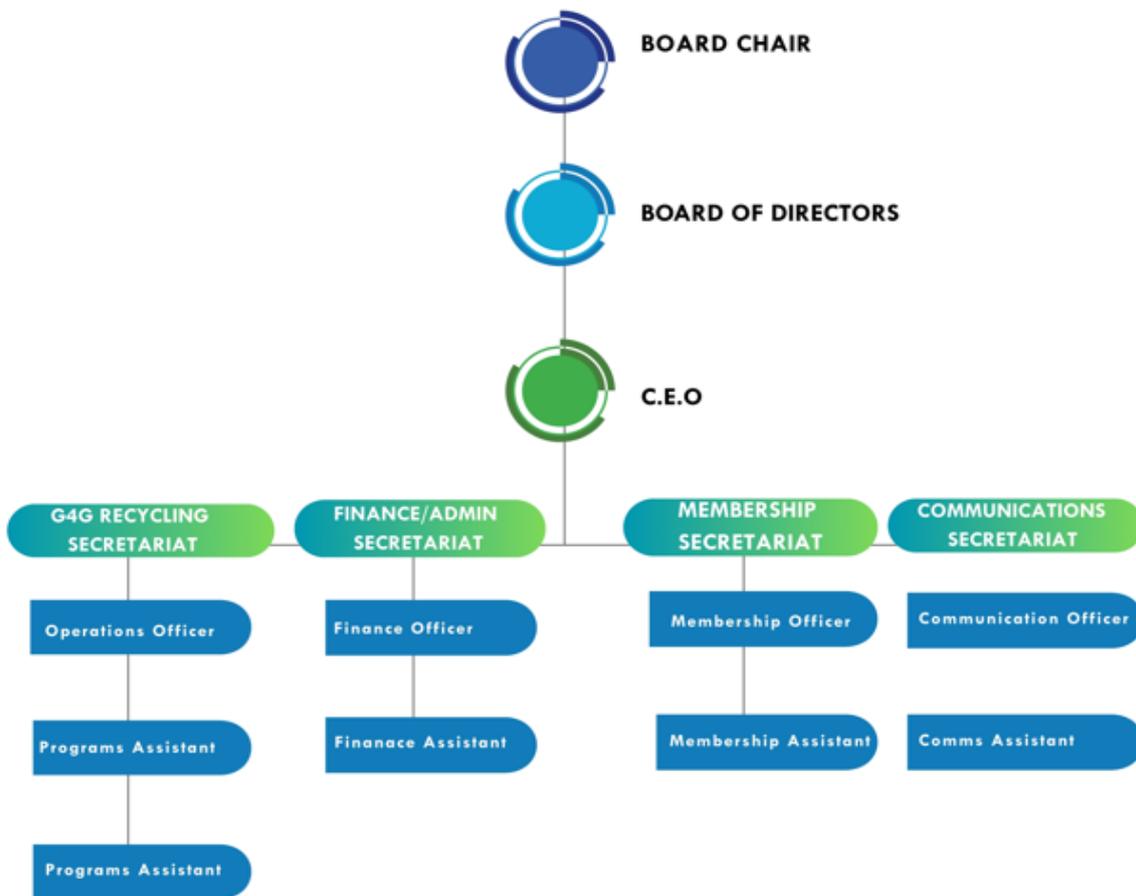
- Polluter Pays Principle: Producers must finance waste recovery and disposal programs.
- Circular Economy Approach: Waste should be managed as a valuable resource.
- Transparency & Accountability: Clear reporting mechanisms to track progress and compliance.
- Stakeholder Collaboration: Engaging producers, recyclers, government agencies, partners, and the public.
- Sustainability: Ensuring long-term environmental and economic viability of waste management systems.

3.0 ABOUT KEPRO

3.1 Current Company Structure

KEPRO is represented by its members and functions under the leadership of the Chief Executive Officer (CEO) and a Board comprised of representatives of its member sectors. The member sectors currently represented in the KEPRO Board are packaging users, Retail traders, private users, raw material suppliers, and packaging manufacturers. KEPRO further has the Secretariat team in four departments, who implement programs and activities as outlined in the EPR plan. Below is the KEPRO organizational structure.

Figure 3-1: Organogram Showing KEPRO's Company Structure



3.2 KEPRO Board & Governance

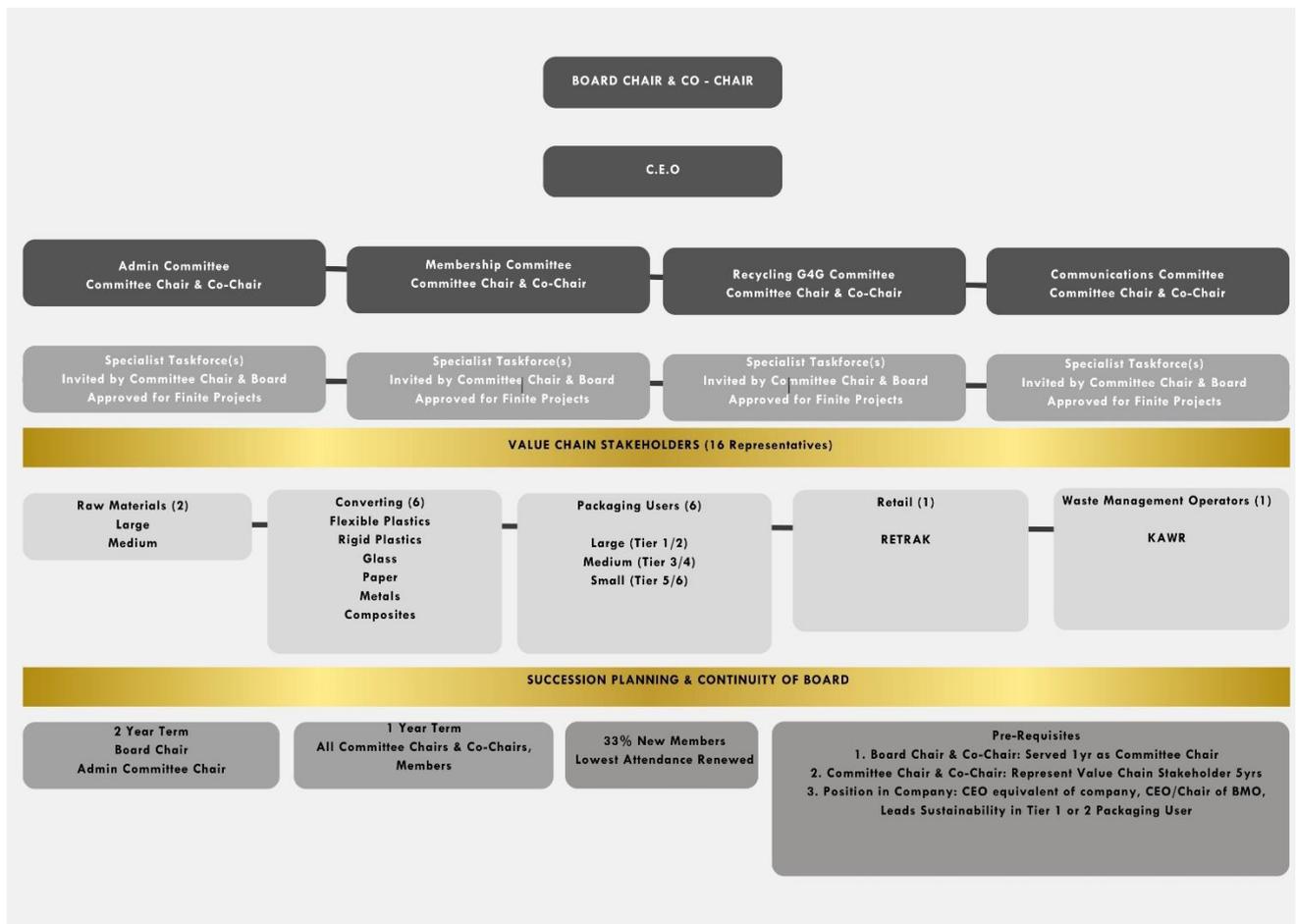
To meet the requirements of the EPR Regulations and implement the Scheme, changes will be required from the Board level all the way through the organization. The scheme will be implemented by the registered Producer Responsibility Organization (PRO), operating as the Kenya Extended Producer Responsibility Organization (KEPRO). KEPRO is an autonomous body established by producers and is a not-for-profit company with a public benefit status. The PRO is managed by a board of directors as per the structure below, which seeks to represent all value chain stakeholders:

- 6 x Packaging User representatives
- 6 x Converter representatives
- 1 x Retailer representatives

- 1 x Waste Management Operator representative
- 2 x Resin Producer representatives

KEPRO's proposed EPR Structure aims to provide the most efficient and cost-effective model to ensure transparency, good governance, and ethical conduct.

Figure 3-1: Figure showing KEPRO's Board Structure and Composition



3.3 Current Membership

Since its inception, KEPRO has been funded by means of a voluntary Membership system where producers paid EPR fees per kilogram of polyolefin polymer purchased by packaging converters from international or local suppliers. KEPRO currently represents approximately 55% of the Rigid's market and 5% of the Flexibles and Multilayer markets, and funds have previously been invested in established collection and recycling projects. KEPRO also represents 80% of the Polystyrene (EPS, XPS, and HIPS) market and 80% of the locally manufactured Vinyl film market.

KEPRO's membership is currently open to:

- Raw materials suppliers – compounders and traders
- Packaging Manufacturers – converters or manufacturers of packaging
- Packaging Users – importers, fillers, or re-packers (brand owners)
- Retail outlets – supermarkets and non-supermarkets
- Supply chain operators – distribution, logistics & stockists
- Recycling value chain Actors – collectors, sorters, aggregators, and recyclers

3.4 KEPRO's Obligations

KEPRO will collaborate with existing organizations to assist with the messaging to improve knowledge and raise awareness that leads to actual behavior change, to change packaging design, minimize waste into the environment, and provide the necessary support to ensure the collection of recyclables.

The Regulations place the following obligations on KEPRO as a PRO:

- At an agreed-upon fee, be responsible for executing extended producer responsibility obligations on behalf of its members.
- Take organizational and managerial responsibility for the collection, sorting, material recovery, recycling, treatment, and end-of-life management of its members' products.
- Register to maintain a database of the member producers and their respective products and assume responsibilities on their behalf.
- Undertake market development for the secondary raw materials market of the products under their scope.
- Establish research and development programs with registered research institutions on emerging technologies to improve material recovery, removal of pollutants, and effective systems for handling post-consumer products.
- Utilize new and existing infrastructure across EPR schemes in a collaborative manner, where feasible, or establish and operate new infrastructure.

KEPRO will meet these obligations by ensuring these items are a focus area in the implementation of planned projects. In addition to meeting the above-mentioned obligations, KEPRO will also aid members and play a supporting role for the producers, collaborating with them and other industry organizations.

4.0 BASELINE FOR THE PRODUCTS AND PACKAGING HANDLED

4.1 Industry Baseline – KEPRO Members’ Packaging Trends

Packaging comes in various forms, tailored to specific product formulations as highlighted in the [Overview of Packaging Materials](#) document. These include:

- Plastic Bottles, Cans, Flexible Plastic Bags and Pouches: Typically made from Polyethylene (PE), Polypropylene (PP), Polyvinyl Chloride (PVC), and PET.
- Composite Materials: Multi-material used for food packaging, snacks

Here is a table summarizing the national baseline figures for plastic packaging in Kenya based on the industry estimates, government reports, and studies:

Table 4-1: Table showing national baseline figures for plastic packaging in Kenya

Indicator	Figure
Total plastic packaging placed on the market	224,000 tons (2022 estimate)
Recycled plastic packaging rate	8% (formal recycling)
Informal sector contribution to recycling	Higher but unquantified
Post-consumer plastic collected	< 50%
Plastic packaging waste leakage	Significant leakage into the environment
Recyclability of plastic packaging	< 30% is designed for recyclability
Use of recycled content in packaging	Less than 2%

Data Source: Kenya Plastics Action Plan

KEPRO members produced an estimated amount of 23,000 tons of non-hazardous Plastic packaging for the period January 2024 to December 2024, with the most used being Corrugated packaging, as shown below:

Table 4-2: Table showing the percentage of packaging materials used by KEPRO members

Packaging sub-category	Percentage	Rank
PET Plastics	8.04%	5
Flexibles/Polythene Plastics – Flexible Mono	16.07%	3
Flexibles/Polythene Plastics – Flexibles Laminate	9.53%	4
Flexibles/Polythene Plastics – Non-Woven	2.62%	7
Flexibles/Polythene Plastics – Woven	5.79%	6
Rigid/Hard Plastics – Rigids Thermoform	0.19%	8
Rigid/Hard Plastics – Rigids Blow	26.92%	2
Rigid/Hard Plastics – Rigids Injection	30.84%	1

Data Source: KEPRO Management Systems (KEPROms)

4.2 Packaging Waste Management Practices in Kenya

In Kenya, packaging waste disposal methods vary, but here are some common practices:

- Landfilling: A significant portion of packaging waste ends up in landfills. This is a common method due to the lack of adequate recycling infrastructure.
- Open Dumping: Many areas still practice open dumping, where waste is disposed of in open spaces without proper management.
- Burning: Burning waste is a prevalent method, especially in rural areas, although it poses environmental and health risks.
- Recycling: Efforts are being made to increase recycling rates. However, only a small percentage of packaging waste is currently recycled.

- Reusing: Some packaging materials are reused, particularly in informal sectors.

Despite the recommendation for recycling and responsible disposal, a significant portion of the population resorts to unsafe disposal methods, including burning and burying. This highlights an urgent need for public education campaigns and improved collection systems.

KEPRO's focus is on all packaging for non-hazardous products produced in Kenya. They include, but are not limited to, the following:

- Plastics Packaging (PET Plastics; Rigid Plastics – Injection, Blow, thermoform; Flexible Plastics – Laminate, Mono, Non-Woven, Woven, etc.)

5.0 PROGRAM STRATEGIES

5.1 Plan for safe handling, processing, and disposal of 100% equivalent volume of products declared by the producer

- Provision of Personal Protective equipment, proper working tools for WMOs, Hand washing points, organizing medical camps, Enrollment to medical insurance, ablution blocks, and Training on workplace safety
- Segregation at source for the waste fractions into wet/organic wastes and dry/recyclable wastes
- Engagement with the different waste service providers (WSPs) and Waste Management Operators (WMOs) for effective recovery of the segregated waste fractions
- Capacity building of the WMOs to ensure further segregation and
- Linkage of the WMOs with the value adders, collection points, aggregation points, and/or recyclers for handling of the recyclable packaging
- Recycling of the different packaging fractions and/or safe disposal for the non-recyclable packaging waste fractions
- Continuous record-keeping and reporting to the authority as indicated in the EPR regulations.

5.2 Plan to meet national targets for reuse, recycling, or recovering operations and end-of-life management

a) Support the Implementation of Material Recovery Facilities (MRFs)

Support the different county and private plans for continuous additionality in material recovery and recycling, including circularity.

Key Performance Indicators:

- Consumer awareness among the general public and Waste Management Operators (WMOs)
- Capacity-building programs- Training of the different WMOs
- Segregation at Source (SaS) initiatives
- Collection Volumes
- Recycling Volumes
- Innovation, research, and development

b) Collection, logistics, recycling, and composting systems and end-of-life disposal mechanisms

The following outlines the recycling value chain process:

- **Aggregation and Segregation:** Aggregation refers to the act or process of collecting mixed waste fragments in a mass and heaping them together while, segregation refers to setting apart or separating the different mixed waste fractions in a manner of organizing them into material types and fragment-specific waste fractions such as rigid plastics, flexible plastics, metals, and paper. Waste aggregation and segregation occur at different sources of waste, inclusive of households, commercial, institutions, industry, municipal, and agricultural levels, as well as that which has been improperly disposed of or leaked into the environment.
- **Waste Collection:** Waste collection involves the transfer of solid waste from the point of use and disposal to the point of treatment, value addition, or landfill. Waste collection is mainly done by the following categories of groups:
 - i. County Governments and through contracted collectors
 - ii. Private Service Providers (PSPs) are commonly known as Garbage collection companies
 - iii. Waste collection groups, commonly known as Community-Based Organizations (CBOs)
 - iv. Waste Pickers – individuals who focus on collecting valuable waste that has leaked into the environment
- **Sorting:** Sorting refers to the separation of particular waste fragments into different categories according to the preset criteria that determine their sorts.

- **Bailing and Transportation:** Bailing refers to bundling or packaging of waste fractions in a compressed entity for storage or easy transportation, while Transportation refers to the ferrying of the waste fractions from one location to the other.
- **Grinding:** Grinding involves the reduction of plastic fragments into small particles by crushing them.
- **Washing:** Washing refers to the process of cleaning flakes with water and, typically, soap or detergent.
- **Agglomeration:** The aim of the agglomeration is to increase the bulk density of the waste, which is necessary to ensure good feeding for some plasticization units.
- **Granulation/Palletization:** Granulation involves the shredding of plastic objects to be recycled into pellets, suitable for later reuse in plastics extrusion.
- **Conversion:** Conversion is the process of converting pellets into new materials and objects.

5.3 Modulation of Extended Producer Responsibility Membership Fees and parameters based on environmental sustainability criteria.

KEPRO charges two types of fees:

i. Annual Membership Fees

The annual membership fees are used for administration purposes. The fee is paid for the different types of Businesses (Large, Medium, Small) or packaging on Metric tons per year in the different tiers. These fees are set by the KEPRO Board as follows:

Table 5-3: Table showing KEPRO Membership Categories

	Visionary:	Champion:	Supporter:
Formerly categorized as	Raw Material Compounders, Manufacturers, & Packaging Users Tier 1 & 2	Packaging Users Tier 3 & 4, Supermarket Retailers	Packaging Users Tier 5 & 6, small businesses
Annual Packaging in kgs	Over 20,000kgs for Large Businesses & Multinationals	5,001 to 20,00kgs or Medium Businesses	0 to 5,000kgs or Small Businesses
Membership Fee	KES 100,000 Excl. VAT	KES 50,000 Excl. VAT	KES 5,000 Excl. VAT

ii. Monthly Volume Declaration Fees

These are the fees that the member pays based on the volumes they put out into the market (declared) to enable KEPRO to undertake its impact programs. The fees are set by KEPRO EPR Councils, which essentially comprise different value chain actors in a specific material fraction, and approved by the KEPRO Board. EPR fees are based on volume in kgs of packaging introduced/sold into the Kenyan market and are unique as per the material sub-fractions.

The EPR Regulations state that a PRO that establishes and implements an EPR scheme must, together with its members, determine the proposed EPR fee and apply the EPR fee proportionally to all members based on the identified products placed on the market. This is agreed upon by the different EPR councils and approved by the KEPRO board.

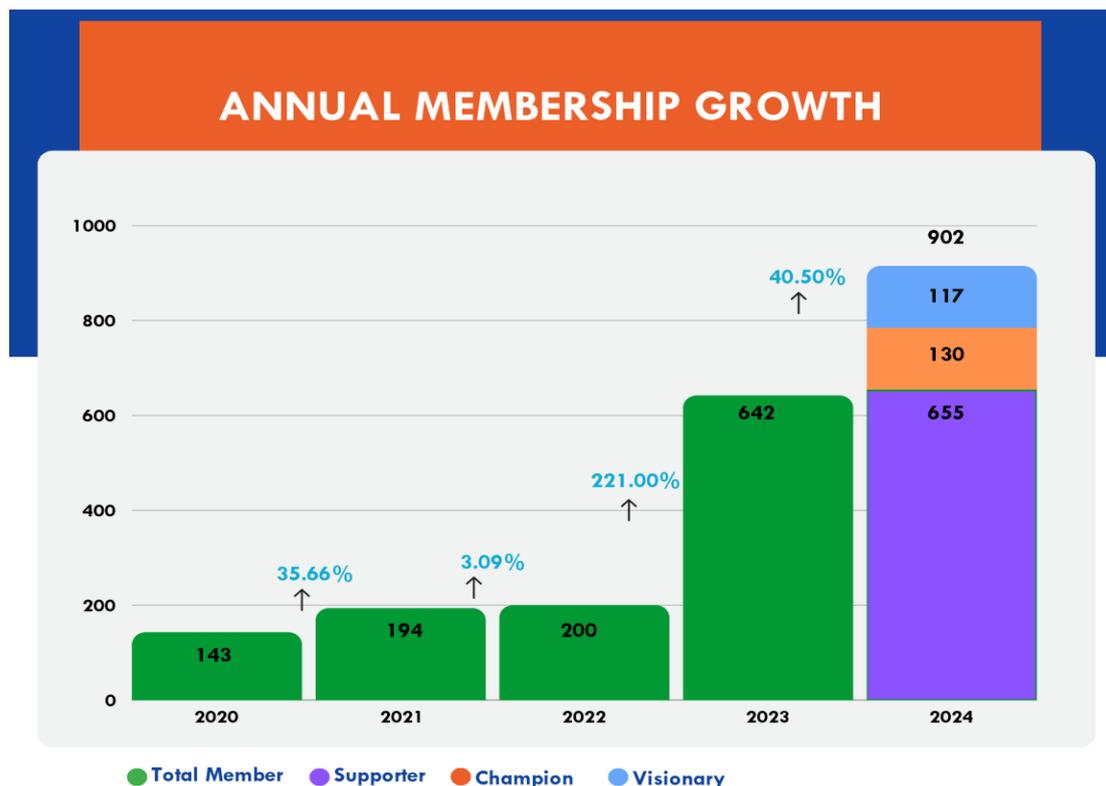
It is important to note that the EPR fee for each material type includes the cost for the implementation of overarching programmes and the cost for each specific packaging material. The cost for implementation of the overarching programmes has been calculated by dividing the total cost for the overarching programmes by the total packaging tonnage placed on the domestic market. The fee per tonne for each type of packaging has been based on the cost for the various interventions to be

implemented to increase collection and recycling, divided by the total tonnage of material placed in the market.

iii. Verifiable paid-up membership list

KEPRO membership comprises different actors across the value chain of packaging for non-hazardous products. Since its inception, KEPRO membership has grown to over 1,000 members as of 31st March 2024. A list of KEPRO’s certified members is annexed.

Figure 5-2-1: Graph to show Annual Membership Growth of KEPRO since inception to Dec



Data Source: KEPRO Management System (KEPROms)

5.4 Programme on public awareness and consumer education

Awareness to consumers will be accomplished via the following strategies and means:

- Campaigns on segregation at source through innovative challenges and sensitization programs focusing on learners from different educational institutions.
- Collaboration with private waste collectors and the County government, and other parastatals such as NEMA, to put across a common message on sustainable waste management.
- Sustained engagements with neighborhood associations.
- KEPRO engages and sensitizes consumers on the segregation of post-consumer packaging waste, making it easier to recover post-consumer packaging for recycling.
- Through innovation hubs, KEPRO invites people with innovative ideas on sustainable waste management methods and incubates these ideas to be properly executed and adapted into the Kenyan market.

5.5 Eco-design standard operating procedure for the products handled by the scheme.

KEPRO will implement awareness creation to packaging manufacturers and packaging users on

packaging design standards to encourage the use of sustainable packaging material. Non-recyclables are to be redesigned for recyclability. Multilayer multi-material to be redesigned to Monolayer Mono-material. KEPRO has partnered with bodies such as the Kenya Bureau of Standards, Confederation of Danish Industries, Kenya Plastics Pact, and the Institute of Packaging Professionals Kenya to jointly develop design standards, since the development of appropriate standards is complex and specific to each product stream.

5.6 Mechanisms for controlling banned or dangerous substances in products handled by the scheme.

KEPRO aims to support members in the non-hazardous packaging value chain, as well as members without banned or dangerous substances. KEPRO will work hand in hand with other PROs to ensure that members who are dealing with dangerous substances are registered. If a member is dealing with banned substances, they are issued with a clearance certificate by NEMA.

5.7 Plan or projection on training and capacity building of members and actors in the scheme

KEPRO has rolled out structured training initiatives targeting producers, waste collectors, recyclers, and government agencies to enhance knowledge among all stakeholders involved in EPR implementation. These training programs equip participants with the necessary skills to comply with regulations, improve waste management practices, and support sustainable packaging solutions. So far, KEPRO has conducted training in 7 regions and has initiated county-specific drives under the Consumer-Led Transformation initiative.

(a) Training Focus Areas

The training covers various aspects critical to EPR execution. The compliance training will educate producers on EPR regulations, reporting obligations, and sustainable packaging practices. Waste management best practices will be shared with waste collectors and recyclers, focusing on sorting, material recovery, and safety procedures. Additionally, stakeholders will be trained on data collection and reporting systems, enabling them to efficiently use KEPRO's digital platforms for waste tracking and fee reporting. Workshops on eco-design and sustainable packaging will introduce innovative packaging alternatives to reduce environmental impact.

(b) Training Implementation Plan

To effectively build the capacity of stakeholders, KEPRO will conduct training through various formats, including workshops, webinars, on-site training, and digital learning platforms. This multi-channel approach ensures accessibility and efficiency in reaching a diverse audience.

(c) Training Schedule and Target Groups

EPR compliance and reporting training for producers and importers will be held quarterly, while waste sorting and collection training for waste pickers and collectors will also take place quarterly. Advanced recycling techniques training will be conducted annually for recyclers and processors, and sustainable packaging design workshops will be organized biannually for manufacturers and retailers.

(d) Training Delivery Methods

KEPRO will employ multiple training delivery methods to enhance learning. In-person workshops will provide hands-on training at waste management centers, producer offices, and government institutions. Webinars and online courses will facilitate interactive virtual sessions covering policy updates, compliance strategies, and best practices. A train-the-trainer model will be introduced, selecting industry

leaders to educate local stakeholders, ensuring broader knowledge dissemination. Additionally, knowledge exchange programs will be established in collaboration with international EPR organizations to bring global expertise into the Kenyan system.

(e) Evaluation and Certification

To assess the effectiveness of training, participants will undergo practical assessments to test their understanding of EPR principles. Successful trainees will receive certifications recognized by KEPRO and regulatory bodies. A feedback mechanism will be introduced to continuously improve training content based on stakeholder input, ensuring relevance and impact.

5.8 Plan to Deal with Legacy Waste

KEPRO recognizes the significant environmental and public health hazards posed by legacy waste, which is historical waste that has accumulated in landfills, dumpsites, rivers, and public spaces prior to the implementation of structured EPR mechanisms. The organization will adopt a phased and collaborative approach to address legacy waste, including:

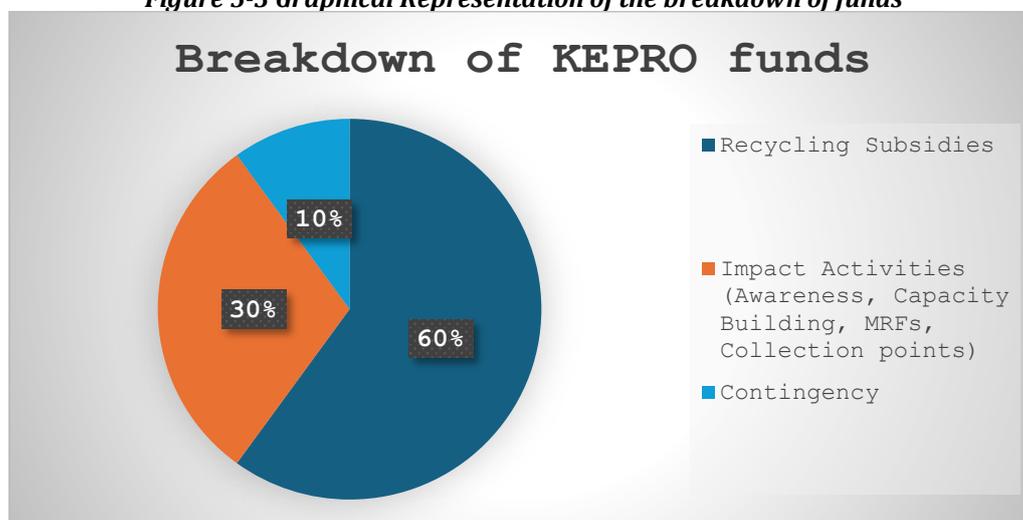
- Mapping & Assessment: Collaborate with county governments and NEMA to identify, map, and quantify legacy waste hotspots across the country.
- Clean-Up Campaigns: Mobilize waste pickers, CBOs, and youth groups to carry out structured clean-up operations targeting illegal dumpsites and public areas.
- Rehabilitation of Dumpsites: Work closely with county governments and NEMA to rehabilitate open dumpsites and convert them into green spaces, material recovery hubs, or controlled landfills.
- Incentivized Recovery: Provide subsidies to recyclers and aggregators for materials recovered from legacy waste streams.
- Historical EPR Fund: Establish a dedicated fund sourced from surplus EPR fees, grants, and public-private partnerships to support legacy waste initiatives.

KEPRO's legacy waste strategy is aligned with national environmental priorities and aims to complement ongoing EPR programs, ensuring that both historical and current waste streams are effectively managed.

5.9 Model of financing the scheme, integrating financial flows to the entire value chain actors

KEPRO's financial plan will be financed through the allocation of annual membership and monthly declaration fees, and through the indicative EPR Fees set. Below is the indicative breakdown in percentage of how funds will be allocated and spent.

Figure 5-3 Graphical Representation of the breakdown of funds



6.0 DETAILED IMPLEMENTATION PLAN

6.1 KEPRO workplan with other counties

KEPRO is working in close partnership with all 47 counties to achieve the overarching aim of not negatively impacting the Kenyan environment caused by waste from products introduced into the country's borders. KEPRO is planning to ensure the availability of collection points in these counties, as well as educate the counties on the requirements of the Sustainable Waste Management Act 2022. Using national data and population proxies, we estimate waste generation for each of Kenya's 47 counties and assess waste-management readiness as we select counties for the Consumer-Led Transformation (CLT) initiative, which aims to increase awareness and enhance behavioral change in waste practices and segregation.

Table Error! No text of specified style in document.-1: Table showing county waste mapping and prioritization Matrix

County	Est. Annual Waste (t)	Infrastructure Readiness (status)	Stakeholder Engagement	Priority Rank
Nairobi	~791,000	Medium – Major dumpsite (Dandora), Upcoming MRF	High – active PROs, NGOs, pilot schemes	1- PRESENCE
Kiambu	~473,000	Low/Medium – operates a landfill (Kang'oki), county support	High – growing private collection	2- PRESENCE
Nakuru	~419,000	Medium – engineered landfill (Gioto), some recycling, No MRF	High – supportive county policies	3- PRESENCE
Kakamega	~357,000	Low – one major dumpsite, limited treatment facilities, No MRF	Low – minimal organized schemes	4- PRESENCE
Bungoma	~319,000	Low – informal disposal sites, no formal incinerator, No MRF	Low – limited programs	5- PRESENCE
Meru	~290,000	Low/Med – county landfill operational (Meru dumpsite)	Low/Med – some county initiatives	6- PRESENCE
Kilifi	~282,000	Low – mainly open dumpsites, no large treatment plants, No MRF	Low – little formal engagement	7- PRESENCE
Machakos	~266,000	Medium – Konza landfill, waste-to-energy pilot planned	Medium – active CEJAD, other NGOs	8- PRESENCE
Kisii	~240,000	Medium – one dumpsite, poor collection coverage	Low – minimal NGO activity	9- PRESENCE
Mombasa	~234,000–365,000	Medium – three dumpsites, heavy collection fleet	Medium – county waste campaigns, PPPs	10-PRESENCE
Narok	~229,000	Low – no engineered landfill, some dumping sites	Low – little structured engagement	11
Kajiado	~226,000	Low/Med –sanitary landfill (UNDP-supported)	Low – nascent programs	12-PRESENCE
Uasin Gishu	~224,000	Medium – integrated dumpsite (Eldoret)	Medium – county programs exist	13-PRESENCE
Kisumu	~223,000	Medium –dumpsite (Kachok) MRF recently built	High– county recycling initiatives	14-PRESENCE
Migori	~220,000	Low – old dumpsite, no high-tech facilities	Low – minimal engagement	15
Homa Bay	~220,000	Low – single dumpsite, inadequate waste collection	Low – few initiatives	16
Kitui	~219,000	Low – open dumps, pending	Low – limited	17 - PRESENCE

		transfer solutions	engagement	
Murang'a	~199,000	Med – county landfill, MRF set up, still not operational	Low/Med – some recycling drives	18-PRESENCE
Trans-Nzoia	~191,000	Low/Med – small dumpsite, bulk disposal needs upgrade	Low – low NGO presence	19-PRESENCE
Siaya	~189,000	Low – no engineered landfill	Low – few programs	20
Makueni	~186,000	Low – minimal infrastructure	Low – few initiatives	21-PRESENCE
Turkana	~183,000	Very Low – remote, lacks formal disposal sites	Very Low – scarce engagement	22
Busia	~173,000	Low – basic dumpsites, no incineration	Low – limited engagement	23
Mandera	~171,000	Very Low – no engineered systems	Very Low – minimal governance	24
Kericho	~170,000	Low – small landfill, inadequate equipment	Low – few organized activities	25
Nandi	~170,000	Low – open site, no treatment	Low – low awareness	26
Kwale	~169,000	Low – one dumpsite	Low – minimal stakeholder work	27
Bomet	~168,000	Low – lacks proper facilities	Very Low – negligible engagement	28
Garissa	~165,000	Low – one dumpsite, some public burning	Very Low – scarce NGO activity	29
Wajir	~155,000	Very Low – no proper landfill	Very Low – minimal engagement	30
Nyeri	~149,000	Low – Kagumo dumpsite often overflows	Low – few private sector efforts	31- PRESENCE
Baringo	~131,000	Very Low – incomplete landfill (Kabarnet)	Very Low – low engagement	32
West Pokot	~121,000	Very Low – open dumps, no formal systems	Very Low – scarce initiatives	34
Nyamira	~117,000	Low – lacks proper landfill	Low – limited engagement	35
Kirinyaga	~117,000	Low – missing engineered sites	Low – few awareness campaigns	36
Embu	~116,000	Low – one dumpsite (Embesa)	Low – minimal recycling programs	37- PRESENCE
Vihiga	~112,000	Very Low – no engineered landfill	Very Low – no formal programs	38- PRESENCE
Laikipia	~100,000	Very Low – lacks dedicated waste sites	Very Low – scant engagement	39- PRESENCE
Marsabit	~92,000	Very Low – no modern waste facilities	Very Low – scarce initiatives	40
Elgeyo-Marakwet	~88,000	Very Low – lacking proper disposal	Very Low – minimal activity	41
Tharaka-Nithi	~74,000	Very Low – no engineered landfill	Very Low – very low engagement	42- PRESENCE
Taita-Taveta	~65,000	Medium– basic waste sites MRF functional	Medium – county waste campaigns, PPPs	43- PRESENCE
Tana River	~63,000	Very Low – no landfill	Very Low – minimal	44
Samburu	~62,000	Very Low – only informal	Very Low – none	45 - PRESENCE

		dumpsites		
Isiolo	~56,000	Very Low – no proper landfill	Very Low – none	46- PRESENCE
Lamu	~30,000	Very Low – one small dumpsite in Lamu town	Very Low – negligible	47

Data Source: <https://www.theearthandi.org/post/sustainable-solid-waste-management>

Data Source: Environmental Best practices in waste management-NEMA

KEPRO already has a presence in 41 countries where it has established a network of contacts with stakeholders. KEPRO has partnerships with Kisumu, Murang’a, Taita Taveta, Mombasa, Kiambu, Kisii, and Nairobi Counties to achieve the following:

- Expanding waste collection points and centers in both urban and rural areas.
- Enhancing recycling infrastructure through public-private partnerships.
- Engaging county governments in the enforcement of EPR compliance.
- Training local waste collectors and recyclers in best practices.

KEPRO’s approach across all 47 counties will be to prioritize strategic areas of focus. The strategic areas are to be implemented in the initial phase, which would take the initial 4 years, including: -

- i. Increasing waste collection and recycling/conversion rates
- ii. Separation and reduction of waste at source
- iii. Support to counties to domesticate the Sustainable Solid Waste Management Act, 2022
- iv. Capacity Building, Education and Awareness
- v. Equipment and Infrastructure Development initiatives
- vi. Waste Picker Integration
- vii. Technology and Data Collection
- viii. Resource Mobilization through Public-Private Partnerships (PPPs) and Financing Reforms
- ix. Research and Development
- x. Reverse logistics

6.1.1 Increasing Collection Rates and Recycling/Conversion Rates

KEPRO has established progressive collection and recycling targets to guide implementation efforts. These targets are aligned with global best practices and Kenya’s waste management strategy to ensure a structured approach to waste recovery and recycling.

Table 6-1: KEPRO collection and recycling targets

Year	Collection Target (%)	Recycling Target (%)
Year 1	30%	15%
Year 2	45%	30%
Year 3	60%	50%
Year 4	75%	70%

To meet these targets, KEPRO will implement several key strategies, such as:

- Developing advanced recycling facilities in collaboration with the private sector will enhance processing capacity and efficiency.
- Waste segregation programs will be strengthened to improve the quality of recyclables, making them more valuable and easier to process.
- Additionally, KEPRO will expand collection and sorting centers across all 47 counties to increase access to proper waste management infrastructure.

- Producers will be encouraged to use biodegradable or recyclable materials, encouraging sustainable production practices and reducing non-recyclable waste.
- Public awareness campaigns will also be launched to educate consumers on responsible waste disposal and promote active participation in recycling initiatives.

To promote sustained consumer participation and boost material recovery, KEPRO will implement a waste incentivization model that rewards responsible disposal and recycling behavior. Key initiatives will include:

- **Digital Reward Systems:** Expand partnerships to roll out mobile-based waste collection apps where users earn points for recycling that can be redeemed for cash, goods, or services.
- **Deposit-Refund Schemes:** Introduce pilot programs for packaging materials like PET bottles where consumers pay a small deposit, refundable upon returning the empty packaging.
- **Recycling Competitions & Challenges:** Launch community-level challenges for schools, neighborhoods, and CBOs to encourage waste sorting and recycling, with recognition and prizes.
- **Incentives for WMOs and Recyclers:** Provide performance-based bonuses to WMOs and recyclers for exceeding collection or recycling targets, especially in underserved areas.
- Through these measures, KEPRO aims to drive sustainable waste management, enhance resource recovery, and contribute to a circular economy

6.1.2 Reduction and Segregation of Waste at Source

KEPRO has already identified communities to pilot the CLT-Segregation at source project targeting 2500 households. The short-term goal is to pilot segregation programs in select communities, focusing on educating residents about the importance of separating waste at the source. In the medium term, these programs will be expanded to urban areas, where the volume of waste is higher, and the impact of segregation can be more significant. The long-term objective is to achieve nationwide adoption of segregation at source, making it a standard practice across the country. Sustained implementation will involve mandating sorting and compliance, ensuring that all households and businesses adhere to segregation.

- **Households:** Waste segregation is promoted at the household level based on settlement types. Urban areas (apartments and gated communities) are encouraged to adopt color-coded bins for organics, plastics, paper, glass, and e-waste, with scheduled collections. Informal settlements will have communal waste separation stations supported by trained waste collectors and awareness campaigns. In peri-urban and rural areas, households will also be encouraged to compost organic waste and use designated hubs for recyclables, with cooperatives facilitating collection and linking to recycling markets.
- **Companies & Offices:** Businesses are encouraged to adopt waste separation stations for paper, plastics, organics, and e-waste, with internal policies promoting responsible waste disposal. Employee sensitization programs and partnerships with recyclers will ensure proper collection and processing. Additionally, businesses are urged to reduce material use in operations, increase product durability, and implement efficient material use policies to minimize waste at the source.
- **Industries:** Manufacturing and industrial facilities are supported in setting up on-site segregation systems for production waste, including metals, plastics, and hazardous materials. KEPRO will advocate waste audits, sustainable packaging, and circular economy initiatives to reduce industrial waste at the source. This includes encouraging companies to adopt material-efficient designs, enhance product longevity through durability and repairability, and improve production efficiency to generate less waste.
- **Schools & Churches:** Educational institutions are integrated into the waste separation framework

through structured programs, including color-coded bins, student-led recycling initiatives, and environmental education. Schools will also serve as collection points for recyclables, fostering early adoption of waste management practices among students. Furthermore, KEPRO will promote sustainable procurement practices in schools to minimize packaging waste and encourage material reuse.

6.1.3 Capacity Building

Beyond driving recycling initiatives, KEPRO prioritizes the safety and well-being of its waste management partners. Recognizing the critical role these individuals play, KEPRO has demonstrated this commitment by distributing essential tools and Personal Protective Equipment (PPE) to over 5,000 waste entrepreneurs nationwide over the past years. By reducing exposure to harmful substances, this initiative contributes to a healthier workforce, ultimately enhancing work efficiency and productivity by providing proper equipment such as gunny bags, rakes, fork jembes, slashers, pangas, and spades.

In the short and medium term, efforts will be scaled up to ensure a regular and adequate supply of PPEs and tools, while also introducing medical camps to offer periodic check-ups, health education, and basic treatment. Integration into a medical scheme will further enhance access to healthcare services for WMOs and their families, offering them greater medical security and social protection. In the long term, the strategy envisions a holistic approach that not only maintains the supply of PPEs and medical support but also addresses broader health and hygiene needs through the construction of ablution blocks at key waste management sites. These sanitation facilities will significantly improve working conditions, reduce exposure to disease, and promote dignity and well-being among WMO workers, ensuring a safer, healthier, and more sustainable working environment.

6.1.4 Infrastructure Development

The waste ecosystem in all 47 counties is currently heavily reliant on informal waste collectors, making it difficult to establish meaningful engagements prior to registration of the same. KEPRO has established 6 designated waste collection points in malls, churches, schools, and residential associations to enhance recovery efforts. The collection points serve as convenient drop-off locations for the community members to dispose of recyclable waste, ensuring efficient waste collection while creating job opportunities for the CBOs. Additionally, they contribute to environmental conservation by reducing pollution and encouraging sustainable waste management practices. In the short term (Years 1 and 2), more collection points and mini-Material Recovery Facilities (MRFs) will be set up to support waste segregation and recycling. The medium-term goal (year 3) is to expand buyback centers and recycling hubs, providing more opportunities for waste recovery. In the long term (Year 4 onwards), high-tech recycling facilities will be developed to process waste more efficiently. Sustained implementation will involve establishing a fully operational recycling network that covers all regions.

6.1.5 Take Back and Reverse Logistics

Take-back means a mechanism through which producers collect their products from consumers. In realization of this plan, KEPRO will engage its members in a take-back mechanism that will target four categories of companies according to their mode of distribution:

- A. Vertically Integrated Companies:** Businesses with full control over their production and supply chain systems
- B. Logistics Outsourcers:** Companies that maintain production control but outsource logistics
- C. Full Outsourcers:** Companies that outsource both production and supply chain operations
- D. SMEs with Informal Supply Chains:** Smaller businesses with limited or undefined supply chain structures

Model A: Vertically Integrated Companies Characteristics

These businesses typically maintain direct relationships with both retailers and end-consumers, allowing them to implement comprehensive internal systems for product recovery. This level of integration makes it easier to coordinate take-back logistics, monitor performance, and engage consumers directly. Examples include major beverage companies and domestic appliance manufacturers.

Take-back Approach

1. Reverse Logistics Integration
 - Utilize existing delivery routes for the collection of post-consumer products
 - Implement standardized collection at distribution points
 - Establish dedicated return centers at production facilities
2. Retailer Partnership Program
 - Formal agreements with retailers for in-store collection points
 - Staff training and incentive programs
 - Co-branded collection infrastructure
3. Direct Consumer Engagement
 - Digital platforms for collection point locators
 - Product-specific collection drives
 - Consumer incentives tied to brand loyalty programs
4. Waste Collector Integration
 - Incentivize waste collectors to uptake from assigned collection points

Model B: Companies with Outsourced Logistics Characteristics

These companies typically have an indirect relationship with downstream distribution channels, resulting in mixed control over the product's journey to the end consumer. This setup requires coordinated efforts with logistics partners to implement effective take-back systems. Examples include consumer goods manufacturers and electronics producers.

Take-back Approach

1. Logistics Partner Integration
 - Contract amendments with logistics partners to include take-back obligations
 - Performance indicators for collection rates
 - Shared investment in collection infrastructure
 - Collection Hub Network
2. Establishment of strategically located collection hubs
 - Aggregation points for logistics partners to consolidate volumes
 - Shared facilities with other KEPRO members
3. Retailer Drop-off Network
 - Agreements with retailers for collection points
 - Regular collection schedules with logistics partners
 - Standardized collection containers and signage
4. Waste Collector Integration
 - Incentivize waste collectors to uptake to collection points

Model C: Companies with fully outsourced production and supply chain Characteristics

These companies primarily focus on brand management and marketing, relying on contractual

relationships with manufacturers and distributors to bring products to the market. Implementing take-back systems in this model requires embedding recovery responsibilities within contracts and leveraging brand-led initiatives. Examples include fashion brands and licensed consumer products.

Take-back Approach

1. Contract-Based Producer Responsibility
 - Inclusion of take-back obligations in manufacturing contracts
 - Mechanisms to support recovery infrastructure
2. Brand-Led Collection Initiatives
 - Direct consumer collection through branded return programs
 - Mail-back systems for defective and expired products
 - Collection drives at high-traffic locations
3. Multi-Brand Collection Partnerships
 - Industry-specific collection platforms
 - Shared collection infrastructure with similar brands
 - Unified messaging and consumer education
4. Waste Collector Integration
 - Incentivize waste collectors to uptake to collection points

Model D: SMEs With Undefined Supply Chain Characteristics

These businesses often operate locally and maintain direct interactions with customers, but lack structured logistics or recovery systems. Take-back solutions for this group require collaborative approaches and community-based models. Examples include small manufacturers, artisanal producers, and local brands.

Take-back Approach

1. Collective SME Collection Points
 - Shared collection infrastructure at business clusters
 - Collaborative collection centers in industrial zones
 - Rotating collection drives in commercial areas
2. Association-Based Collection Systems
 - Industry association-led collection drives
 - Pooled resources for shared collection infrastructure
 - Joint awareness campaigns and consumer education
3. Community-Based Collection Networks
 - Partnerships with community organizations
 - Integration with existing waste collection systems
 - Utilization of local Waste Management Operators (WMOs)
4. Waste Collector Integration
 - Incentivize waste collectors to uptake to collection points

Take back with WMOs

- Partnering with local CBOs, youth, and women's groups to manage neighborhood collection points.
- Providing training, branding, and infrastructure support (bins, PPE, signage).
- Integrating local waste pickers with licensed WMOs for formalized off-take.
- Running targeted awareness campaigns through barazas, schools, and digital platforms.
- Establishing a holding point as a demonstration site for scalable community-led recovery.

Advanced Consumer Engagement Strategies

To ensure high consumer participation in take-back schemes, KEPRO with the companies, will move beyond general awareness campaigns and integrate proven behavioral insights into program design. Strategies include:

- Gamification and Mobile Apps: Users can earn points for every item returned, unlock achievements, and compete in community leaderboards. Points may be redeemable for airtime, discounts, or branded merchandise.
- Real-Time Feedback Loops: Mobile tracking apps and SMS notifications will show users their impact (e.g., “You’ve helped recover 2kg of plastic this month!”), Reinforcing positive behavior.
- Social Norm Nudges: Messaging such as “Join 10,000 others in your county recycling today” will tap into peer influence.
- Localized Rewards: Partnerships with local vendors will allow consumers to redeem rewards in their communities, supporting local economies.
- Behavioral Defaults: Where feasible, reverse logistics or automatic pickup options will be used to reduce consumer effort.
- Youth Engagement: School and university competitions will be rolled out under the CLT initiative to build early habit formation.

Table 6-2: Table showing Tack back 4 yr plan

Year	Focus	Key Action	Expected Result
2025	Pilot Setup	Launch take-back pilots with selected companies	Functional pilot models in place
2026	Scale-Up	Expand take-back to more companies and locations with reverse logistics	Increased participation and recovery rates
2027	Innovation & Reach	Introduce digital tools and reach more regions	Broader coverage and consumer engagement
2028	Sustain & mainstream	Institutionalize systems and secure long-term funding	Sustainable and compliant national system

6.1.6 Support to Recyclers and Aggregators

KEPRO already has existing contracts with 12 recyclers. Contracts with more recyclers and aggregators will be formed in the short term to establish a network of partners for waste processing. In the medium term, partnerships with industries will be developed to promote the use of recycled materials. The long-term objective is to establish nationwide material recovery systems, creating a robust circular economy. Sustained implementation will involve completing the circular economy framework, ensuring that all waste is reused, recycled, or recovered.

KEPRO plans to increase the support for recyclers through the EPR Scheme using small-scale projects such as:

- Funding the purchase of equipment, such as bailers or the installation of washing plants, on a case-by-case basis, and the availability of funding
- Funding existing recycling businesses through a subsidy program to grow and develop up the value chain
- Small-scale support such as PPE or cages, etc.
- Resource and Energy efficiency assistance in partnership with NEMA & other relevant agencies. Funding will be based on continued support with existing recyclers as well as growing new capacity for existing recyclers and new businesses.

Withal, KEPRO has a Waste Collector’s Toolkit which has been provided to recyclers to support them

capacity build waste collectors in their business and to maximize their business potential. Through a phased approach, KEPRO will work towards establishing a business skills development which will enable the following skills transfer:

- The transfer of skills to effectively run a mechanical recycling operation in terms of technical, financial, management, and commercial skills.
- Mentorship and training in terms of obtaining and managing the working capital required to start and operate a mechanical recycling operation.
- Mentorship and training in terms of operating the business from an operational perspective.

6.1.7 Waste Picker Integration

On 14th November 2023, KEPRO launched a Waste Collectors' Toolkit, a transformative guidebook designed to empower local waste collectors in every way possible. This pioneering toolkit aims to revolutionize waste collection practices and improve waste collectors' efforts with practical insights, tools, and strategies for sustainable waste management, empowering waste collectors to handle waste more effectively. So far, over 700 copies have been distributed across different regions, empowering collectors with essential knowledge and skills. Additionally, KEPRO has contributed to employment creation through the formalization of waste pickers, ensuring they are recognized as key players in the waste recovery sector.

KEPRO is working towards reviewing the Waste Collectors toolkit as a short-term initiative to update the toolkit to reflect recent updates and regulations. As part of its Extended Producer Responsibility (EPR) framework, KEPRO is working on integrating waste pickers into a formal system to ensure fair compensation, improve working conditions, and enhance waste collection efficiency. Training programs will be provided to equip them with skills in waste sorting, material recovery, and safety standards.

To strengthen their role in the value chain, waste pickers will be organized into cooperatives that facilitate direct engagement with recyclers and material recovery centers. KEPRO will also guarantee fair market rates for collected materials and introduce a bonus system to reward high-performance collectors. Importantly, KEPRO is committed to ensuring that waste pickers' conditions and livelihoods are improved, not worsened, through formalization efforts.

6.1.8 River Restoration

KEPRO has actively engaged in conducting extensive clean-up operations across various river locations in Nairobi River, Mathare River, Kandisi River and Kirichwa River which have resulted in the collection of approximately 3000 metric tons of waste through collaborative efforts with local authorities and Community-Based Organizations (CBOs); in addition to these immediate actions, KEPRO is concurrently working with to ensure member clearance from Environmental Restoration Orders issued by the Authority NEMA, generating employment opportunities for young people, and establishing partnerships with other Producer Responsibility Organizations (PROs) to initiate crucial conversations aimed at developing a sustainable long-term strategy for waste management and river clean-up in Nairobi. Looking towards the medium term, KEPRO plans to engage and collaborate with a diverse range of stakeholders to implement sustainable methodologies for addressing river pollution. Ultimately, KEPRO is committed to not only undertaking these essential short-term clean-ups and medium-term collaborations but also to developing and implementing truly innovative and sustainable long-term solutions to effectively combat river pollution within Nairobi County, thereby fostering a cleaner and more sustainable environment for the future.

6.1.9 Awareness & Education

KEPRO's visionary 5-year Consumer-Led Transformation (CLT) Initiative in Nairobi County, Kenya, strives to cultivate a sustainable future by empowering individuals to adopt eco-conscious choices and fostering collective environmental responsibility in waste management. This program aims to elevate understanding, inspire behavioral changes, and advocate for supportive policies, shifting public attitudes towards sustainable waste practices under the empowering principle, "My Waste, My Responsibility!" Aligned with KEPRO's dedication to a circular economy, the CLT Initiative unfolds in three phases: initially focusing on public awareness for proper waste disposal via campaigns, followed by promoting waste segregation at the source into recyclable and organic streams, and ultimately fostering a preference for recycled goods by enhancing recycling and encouraging design for recyclability. Notably, in 2024, KEPRO directly engaged over 3,000 individuals from more than 40 counties through workshops and town halls, while their messaging on digital and mainstream media reached an audience exceeding 10 million.

Currently, KEPRO is actively engaged in the initial phase, establishing foundational knowledge about correct waste disposal, while simultaneously beginning the gradual transition towards the second phase, emphasizing the crucial habit of waste sorting.

Through short-term campaigns and media engagement, complemented by medium-term training and behavior change programs, KEPRO will actively drive consumer awareness. Long-term strategies include integrating waste education into school curricula and sustaining public involvement through continuous campaigns and educational efforts across all counties. The CLT program further amplifies waste management awareness, progressively targeting all 47 counties, focusing on KEPRO members, consumers, and the wider public.

The KEPRO Youth Chapter's School and Church Awareness Program educates and empowers young environmental advocates. KEPRO is targeting to reach the youths with a medium-term goal of reaching over 5,000 youths through schools and churches, and a long-term goal to ensure environmental sustainability is included in the school's curriculum.

6.1.10 Technology & Data Tracking

Currently, KEPRO is working to build an online waste marketplace to enhance waste management practices. In the short term, this online marketplace will be piloted to monitor waste collection and recycling through different Material Recovery Facilities (MRFs), providing valuable data for optimizing processes. In the medium term, the app will be launched in communities, accompanied by a waste incentivization model to encourage the collection of more recyclable waste. The long-term goal is to automate waste auditing and digital reporting processes, reducing manual intervention and improving data reliability. Sustained implementation will involve establishing a real-time monitoring system that provides continuous updates on waste management activities. The end goal is to have QR code labeling and SKU-based data collection in Kenya for traceability of packaging from producers to recyclers and explore the use of blockchain technologies to secure data across the waste value chain, ensuring tamper-proof compliance records and full chain-of-custody for post-consumer packaging.

6.1.11 EPR Policy Development and Regional Alignment

KEPRO will establish EPR councils for each material to facilitate EPR fee alignment, policy discussions, and stakeholder engagement. In the medium term, regulations and enforcement mechanisms will be strengthened to ensure compliance with waste management policies. The long-term goal is to integrate

regionally with the East African Community (EAC), harmonizing waste management policies across member states. Sustained implementation will involve continuous engagement with stakeholders to maintain and improve waste management practices.

6.1.12 Transformation

The adoption of EPR is set to transform Kenya's waste management sector by shifting from a linear waste disposal system to a circular economy. This transformation will impact policy, industry practices, and consumer behavior. From a regulatory perspective, enforcement of EPR regulations will be strengthened to ensure producer compliance, while policy reforms will incentivize sustainable production and discourage single-use plastics. Cross-sector collaboration will also align EPR policies with national development goals.

For industries, businesses will be encouraged to adopt eco-friendly product designs, invest in recycling technologies, and establish green supply chains that promote sustainability. Consumer behavior will also evolve through increased participation in waste segregation, promotion of reuse and repurposing of materials, and the introduction of reward systems like deposit-refund schemes to encourage responsible waste disposal.

6.1.13 Research and Development

Research and development (R&D) are essential in advancing Kenya's waste management sector. KEPRO has begun forming partnerships with organizations that have expertise in R&D. KEPRO's short-term goal is to invest in R&D to drive innovation in recycling technologies, biodegradable packaging, compliance monitoring systems, and market analysis for recycled products. To support these efforts, KEPRO will collaborate with universities and research institutions on pilot projects, engage with international agencies to adopt global best practices, and establish innovation hubs for startups and entrepreneurs to develop new waste recovery solutions.

6.1.14 Secondary Market Development

A well-functioning secondary market ensures that recovered materials are efficiently reintegrated into production cycles. KEPRO will strengthen this market by linking waste collectors, recyclers, and manufacturers to enhance the demand for recycled materials. To achieve this, KEPRO will build market linkages by connecting recyclers with manufacturers to promote the use of recycled inputs in production. Investment in processing technology will be encouraged to support waste-to-product innovations such as plastic lumber, recycled paper, and alternative packaging solutions. Additionally, KEPRO will advocate for regulatory support, including tax incentives and preferential procurement policies that encourage industries to adopt recycled materials. Public awareness campaigns will also be conducted to educate consumers on the benefits of purchasing products made from recycled materials, fostering a sustainable circular economy.

6.1.15 Stakeholder Engagement

Collaboration is one of KEPRO's core values and is deeply embedded in its approach to Extended Producer Responsibility (EPR). Defined as understanding, working with, and advocating alongside all stakeholders across the value chain, this value underpins KEPRO's strategy to ensure inclusive, transparent, and effective implementation of EPR. KEPRO has adopted a structured, collaborative approach by engaging relevant stakeholders through formal partnerships, regular industry roundtables, EPR forums, and a national advisory committee that provides policy recommendations. Public-Private Partnerships (PPPs) are also being leveraged to co-finance infrastructure, support recycling, and foster innovation in sustainable materials.

To date, KEPRO has signed Memorandum of Understanding (MoUs) and formal partnerships with several key stakeholders, each contributing to specific areas of the EPR framework. These include:

- Kenya Alliance of Resident Associations (KARA) – focusing on community awareness and citizen engagement.
- Danish Industries East Africa (DI) – driving impact activities that promote a just and green transition and leveraging peer power through youth advocacy.
- Institute of Packaging Professionals Kenya (IOPPK) – collaborating on sustainable packaging solutions.
- Practical Action – building the capacity of Waste Management Operators in Kisumu.
- M-Taka – promoting waste incentivization through the M-Taka app platform.
- Hand in Hand Kenya – supporting the development of resilient and inclusive waste-based enterprises.
- Japan International Cooperation Agency (JICA) – strengthening waste management infrastructure.
- Kenya Association of Manufacturers (KAM) – engaging with manufacturing members and aligning with national policy frameworks.

In addition, KEPRO is working closely with other critical stakeholders such as:

- WWF-Kenya
- Retail Traders Association of Kenya (RETRAK)
- Council of Governors (CoG) and all 47 County Governments
- National Environmental Management Authority (NEMA)
- Kenya Plastic Pact (KPP)

These collaborations are essential to grounding the Sustainable Waste Management Act and the resultant EPR Regulations, ensuring effective EPR enforcement and compliance. Looking ahead, KEPRO plans to expand its partnerships in the medium and long term to unlock financing and technical support for on-the-ground projects.

6.1.16 Membership/Producer Compliance & Audits

KEPRO has taken steps to achieve membership beyond compliance by offering training on packaging trends, ESG Readiness, accelerator programs on business growth, and Taka Tour ventures. KEPRO has created a KEPRO management System to ensure that all members can declare their monthly Volume declarations online. This system can indicate compliant and non-compliant members. KEPRO has a membership visits program for each month to ensure compliance and awareness of the producer's obligations as stated in the EPR Regulations. The short-term focus will be on registering for Extended Producer Responsibility (EPR) and assessing fees for producers. This will ensure that producers are accountable for the waste generated by their products. In the medium term, member audits and compliance tracking will be conducted to monitor adherence to EPR regulations. The long-term objective is to expand audits and integrate SKU-based data, providing a detailed analysis of waste generation and management. Sustained implementation will involve standardizing reporting and enforcement mechanisms to ensure consistent compliance.

7.0 STRUCTURE OF PLANNED EPR PROGRAMMES

Under this EPR scheme, programmes over the four-year period have been structured as follows:

1. Overarching programmes: Programmes that are common across all business plans and for which the costs are shared on a per-ton basis.
2. Product-specific programmes: Programmes specific to a particular grouping of packaging. Programmes will be reviewed and refined each year based on experience from implementation.

Activities for the various programmes have been guided by the identified challenges, which include:

- Lack of mandated and enforced separation at source means that most households and businesses do not separate recyclable material from general waste. Mandating and enforcing separation at source will be addressed through collaboration with municipalities.
- Lack of door-to-door collection of recyclables that have been separated at source. Door-to-door collection systems provide the highest recycling rates and the best quality of recyclables. In Kenya, the lack of properly established systems for the door-to-door collection of recyclables is largely mitigated through the efforts of informal collectors, waste pickers, and reclaimers. Informal collectors, waste pickers, and reclaimers need to be compensated for the service they perform in the waste sector, in line with the EPR regulations.
- Public awareness creation is needed to create and maintain a moral drive that leads people to recycle. Public awareness creation must be supported by an appropriate infrastructure to allow people to bring packaging to be recycled or for packaging to be easily collected from households.
- SMMEs need to be supported through formal training regarding the technical aspects of running a sustainable business. Training of SMMEs will sustain, strengthen, and improve the collection and recycling of the material.
- Additional infrastructure may need to be established at appropriate locations to facilitate the collection of material and optimize transportation routes. Land also needs to be identified, and areas appropriately zoned for additional recycling facilities that will need to be permitted. The timelines and costs for permitting are often prohibitive, so close collaboration with national and local government is important.

8.0 RISKS AND POTENTIAL CHALLENGES IN IMPLEMENTATION OF THE EPR PLAN

Granted, the collection and recycling rates for packaging in Kenya are still relatively low and thus require continued investment by the packaging manufacturers and recyclers to sustain the current rates and improve the existing collection and recycling rates. The existing infrastructure needs to be maintained, and daily operating costs need to be covered. In addition, packaging manufacturers and recyclers face specific challenges that need to be addressed to sustain and improve the existing packaging collection and recycling rates. These challenges include, but are not limited to:

- Packaging can become contaminated if not separated at the source and separately collected. With the growth of e-commerce, more packaging ends up at households, and increasing the rates of collection from individual households will become more difficult. Raising awareness of the need to implement separation at source, by both businesses and households, is essential.
- Some types of packaging are used for a wide range of branded goods. Given this, consumers may be confused as to what constitutes waste and whether it is recyclable. This plan assumes that the packaging manufacturers and recyclers will maintain existing infrastructure and establish additional collection facilities and cover daily operating costs.
- The Sustainable Waste Management (EPR) Regulations, 2024, require work plans for all 47 counties. KEPRO will therefore be embarking on engaging counties to support on different fronts, including collection support, and this may potentially pose challenges given the dynamic nature of the waste ecosystems in the various jurisdictions.

8.1 Risk Mitigation Framework

Table Error! No text of specified style in document. -1 Table Showing Risk Mitigation framework with timelines

Risk Category	Risk Description	Impact	Likelihood	Mitigation Strategy	Responsible Party	Time line
Regulatory	Uncertainties in EPR regulations and guidelines cause confusion and slow implementation.	High	Medium	Work closely with NEMA and the Ministry of Environment to issue interim guidance; conduct stakeholder consultations to clarify requirements; provide compliance training.	NEMA; Ministry of Environment & Forestry; Producer responsibility organizations (PROs)	Year 1-2
Stakeholder	Non-registration or non-compliance by producers (so-called “free riders”) undermines scheme funding and targets.	High	Medium	Enforce mandatory registration through NEMA licensing; conduct audits of producer membership in PROs; impose penalties for non-compliance; have PROs actively monitor and report member compliance.	NEMA; PROs (e.g., KEPRO); Industry associations	Year 1-4
Operational	Inadequate waste collection, separation, and recycling infrastructure (e.g., material recovery facilities, logistics) limits the scheme’s effectiveness.	High	High	Invest in new and upgraded MRFs and recycling plants; partner with private recyclers and waste haulers; subsidize or incentivize collection network expansion (especially in underserved counties); maintain existing facilities.	KEPRO/PROs; County governments; Waste management companies	Year 1-3
Operational (Data)	Lack of baseline waste data and	Medium	High	Conduct comprehensive waste audits and surveys in all	NEMA; County governments;	Year 1

	weak monitoring (especially at the county level) hinders planning and target-setting.			counties to establish baseline volumes; implement a robust data-reporting and monitoring system; provide technical support and training to county officials and PROs for accurate data collection.	KEPRO/PROs	
Stakeholder (Awareness)	Low awareness and poor participation by businesses and consumers (e.g., failure to separate recyclables at source) reduce recovery rates.	Medium	High	Launch nationwide education and awareness campaigns (media, schools, industry forums) on recycling and EPR obligations; enforce segregation at source regulations; introduce incentives (e.g., take-back programs, labelling standards) to encourage proper sorting.	NEMA; KEPRO/PROs; County governments; Producers	Year 1-4
Financial	Insufficient funding and rising costs (inflation, currency fluctuations) threaten the financial viability of collection and recycling operations.	High	Medium	Set EPR fees at sustainable levels and index them to inflation; establish a reserve or contingency fund within PRO budgets; pursue grants or concessional financing for infrastructure; optimize operations to reduce costs.	KEPRO/PROs; NEMA (fee approval); Producer members	Year 1-4
Environmental	Failure to meet national recycling/reuse targets risks continued pollution and resource depletion.	High	Medium	Define clear national targets and monitor progress through independent audits; incentivize eco-design and circular-product initiatives; apply corrective plans for shortfalls; regularly review and adjust strategies to stay on track with pollution-reduction goals.	NEMA; KEPRO/PROs; County governments	Year 2-4

9.0 FINANCIAL PLAN

9.1 EPR Fee

KEPRO has developed proposed fees for the identified packaging products, as attached in the appendices section below. From the foregoing, it is evident that a large percentage of KEPRO's funds in the first 12 months will be on awareness and capacity building of waste value chain actors, including payment of subsidies to contracted recyclers.

Please note the following regarding the EPR fees:

1. The above fees assume that KEPRO represents an estimated minimum of 30% of the market share of plastic packaging tonnages placed on the domestic market.
2. It is further assumed that NEMA will ensure sustained enforcement to weed out joyriders/free riders. If this is not the case, then less money will be collected. Less money collected means less money to allocate towards the programmes.
3. The above fees make some assumptions about the market size for packaging. If these assumptions do not hold true, then less money will be collected. Less money collected means less money to allocate towards the programmes.
4. Administration costs will need to be covered. As such, if less money is collected, some money may need to be shifted from the programmes to cover administration and overhead costs.
5. The EPR fee is subject to change based on feedback from stakeholders and the government, and performance of the pilot programmes following the adoption of the regulations.

9.2 EPR Fee Determination

The Regulations state that a PRO that establishes and implements an EPR scheme must, together with its members, determine the proposed EPR fee and apply the EPR fee proportionally to all members based on the identified products placed on the market. KEPRO has undertaken an extensive commitment with the value chain stakeholders in the development of the EPR Scheme and in determining the EPR Fees. The fees have been made publicly available and have been approved by the existing board and KEPRO members. Continuous EPR council meetings will be held to ensure the regulation of the fee.

9.3 EPR Fee Calculation

KEPRO's EPR Fees will be developed taking into consideration the EPR Regulations as explained in the table below. The EPR Regulations require that the EPR Fee be based on net cost recovery, including a differentiated rate per item category, of each product or class of product, which must be paid by a producer to fund extended producer responsibility schemes and be dependent on the criteria.

Table 9-1: Table showing factors included in EPR Fee setting

Requirement	Details
a) Weight of Product	The EPR Fee is charged per tonne of virgin or recycled polymer used.
b) Ease of Recyclability	Limited recycling opportunities for multilayers and vinyls exist currently and need to be developed; therefore, these fees are considerably higher. There will be an investment required in R&D specifically to address and grow recycling opportunities.
c) Current Demand for the Material for Recycling Purposes	This is also tied to ease of recyclability and lack of market in the case of multilayer materials, and this has therefore been factored into the Fee.
d) Costs for Establishing a Collection System for the Identified Products	KEPRO will not develop a separate collection system but will work within existing collection mechanisms,

	providing support to improve and upgrade these, e.g., support and financial assistance to counties implementing Separation at Source programmes, support to Buy-back centers, and investing in MRF infrastructure as well as developing Hubs.
e) Collection, Transport, Storage, and Treatment Costs for Separately Collected Waste	The fee factors in the full logistics of these costs and specifically to the point of collection and sorting, where the budget spend is combined for all materials. This will include the development of collection points.
f) Costs for Public Communication and Awareness Raising (on Waste Prevention, Litter Reduction, Separate Collection, etc.)	This has been budgeted for by KEPRO as a widespread Programme across all the identified products. The budget also includes specific support to counties if required.
g) Costs for the Appropriate Surveillance of the System (including Auditing)	NEMA will be conducting the annual audit.

Note: The current EPR fees have been set by KEPRO through a comprehensive and consultative process on the assumption that the competitive landscape between PROs will not drive the price downwards. We note that the EPR regulations provide that NEMA will be setting the minimum EPR fees to ensure competition between the PROs is not transformed into a race to the bottom.

Table 9-2: KEPRO EPR Fees Structure

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KEPRO Monthly EPR Fees (Packaging Users) effective October 2023 MVD Declarations

Waste Streams	Packaging Sub-Categories	Material Sub-Fractions	KEPROs MVD Categories	KEPROs EPR Fee per kg
PLASTICS	PET Plastics Packaging	PET	Rigids - PET	3.00
		Rigid/Hard Plastics Packaging	RIGIDS - Injection	Rigids - Other Hard Plastics
	RIGIDS - Blow		Rigids - Other Hard Plastics	0.50
	RIGIDS - Thermoform		Composites Hard Plastics	5.00
	Flexibles/Polythene Plastics Packaging		FLEXIBLES - LAMINATE	Composite flexible polythenes (multi-layer)
		FLEXIBLES - MONO	Other recyclable flexible polythenes /Breadbags	7.00
		NON-WOVEN	Other recyclable flexible polythenes (mono-layer)	7.00
		WOVEN	Other recyclable flexible polythenes (mono-layer)	7.00

10.0 MONITORING, TRACEABILITY & COMPLIANCE VERIFICATION

To ensure adherence to EPR regulations, KEPRO will implement a comprehensive monitoring, traceability, and compliance verification system. This will involve regular audits, digital tracking technologies, and enforcement measures to ensure producers meet their obligations under the EPR framework.

10.1 Monitoring of Producer Compliance

KEPRO will conduct quarterly audits of registered producers to verify their waste collection and recycling contributions. Random spot checks will be carried out at production and distribution facilities to ensure that packaging meets eco-design requirements. Additionally, data validation exercises will be undertaken to cross-check waste recovery reports submitted by producers, ensuring transparency and accountability in the recycling process.

10.2 Product Traceability System

To enhance transparency in product lifecycle management, KEPRO will adopt digital tracking technologies. This system will include QR code labeling, where producers must attach scannable QR codes on packaging to provide recycling information. Blockchain integration will be used to facilitate real-time tracking of packaging materials from production to disposal. Furthermore, geotagged collection points will be mapped to monitor collection rates across different regions, improving efficiency in waste recovery.

10.3 Inspections and Compliance Audits

Annual regulatory inspections will be conducted in collaboration with NEMA and county governments to ensure compliance with EPR regulations. Non-compliant producers will receive corrective action notices, and penalties will be imposed for repeated violations. To encourage best practices, KEPRO will implement performance benchmarking, ranking producers based on their compliance efforts and contributions to waste recovery and recycling targets.

10.4 Reporting

10.4.1 Performance Reporting

Annual performance reports will be submitted to NEMA. The annual performance reports will include the following information as a minimum:

- Performance against the published targets.
- Breakdown of the allocation of the extended producer responsibility fee.
- Performance on all finance matters.
- Governance report, and KEPRO's Annual Workplan.

10.4.2 National Environment Management Authority (NEMA) Reporting

KEPRO will record and report, as a minimum on an annual basis, to the National Environment Management Authority (NEMA) the following information in terms of identified products for members of KEPRO:

- Products introduced into the Kenya market by its members.
- Volumes collected and recycled vs declared
- diverted away from landfill (recycled, reused, recovered, refurbished)
- Consumer awareness campaigns carried out in different counties

This information will be captured on KEPRO's database, and therefore, it is expected that there will be consultation between the Government, Industry, and the PROs before it is finalized. It will be critical that the final system is workshopped collaboratively to ensure the outcome meets everyone's needs.

10.4.3 Financial Reporting

KEPRO will conduct internal biannual financial audits and appoint an independent financial auditor to undertake annual external audits of the financial records. The internal audit reports will be available to the department upon request, and the external annual audit reports will be submitted to NEMA within 60 days of finalization of the audit.

10.4.4 Data Collection

KEPRO will develop a database that will be used to collect the data as required by the Regulations. The database will be managed by an outsourced company to remain independent, and data will be consolidated to provide aggregated results. Budget will be allocated on an annual basis to ensure that the continued development of the database can be undertaken so that it can be updated to meet the needs of KEPRO's EPR Scheme's reporting requirements.

The database will allow reporting on the following instruments to complement the scheme:

- quantity of packaging introduced to the market
- minimum recycled content standards.
- secondary materials utilization rate requirements; and
- recovery rates

10.4.5 Record Keeping

KEPRO will keep and maintain records of products managed, eco-design standards, contracts entered with agents, licensed waste service providers, and recyclers, and the level of performance as per the work plan.

11.0 ANNEXES

11.1 2025 Budget

Item Description	Amount (KES)
INCOME (MEMBERSHIP FEES)	
Member Subscriptions	20,000,000
Total Membership Fees	20,000,000
OPEX EXPENDITURE	
Personnel	27,464,000
IT Expenses	900,000
Admin & Finance Costs	6,280,000
Charge out to G4G Activities (4% of EPR Fees)	(3,400,000)
Total Opex	31,244,000
Net Deficit/Surplus for Opex	(11,244,000)
INCOME (EPR FEES)	
EPR FEES	85,000,000
Total EPR Fees	85,000,000
EPR-RELATED EXPENDITURE	
Gram 4 Gram (G4G)	
Post Consumer Conversion- Recyclers	60,000,000
Impact Activities	21,275,100
EPR Admin Costs	10,750,000
Charge out to G4G Activities (4% of EPR Fees)	3,400,000
Communication Costs	5,280,000
KEPRO Annual Circular Conference	3,000,000
Workshops/Forums/Membership	3,000,000
Travel & Accommodation	3,500,000
Total EPR Related Expenses	110,205,100
Net Deficit/Surplus for EPR Related Expenses	(25,205,100)

OTHER INCOME	
Other Income - ESG Fees, Interest Income from Fixed Deposit, etc.	2,529,041
Grants	6,300,000
Sponsorship for the KEPRO Annual Circular Conference	1,000,000
Total Other Income	9,829,041
OTHER EXPENDITURE	
Grant Expenses	6,300,000
Total Other Expenses	6,300,000
Net Deficit/Surplus for Other Expenses	3,529,041
GRAND TOTAL INCOME	114,829,041
GRAND TOTAL EXPENDITURE	147,749,100
NET SURPLUS / (DEFICIT)	32,920,059

11.2 2025 Workplan

KEPRO Goals for Year 1 based on Strategic Outcomes	Q1	Q2	Q3	Q4
World Most Trusted PRO				
PRO Registration				
Partnership Development				
Annual Reporting				
Media Interviews, Social Media Engagement				
Annual Reporting				
EPR Councils				
Research and Development				
Technology and Data Tracking				
Our Waste, Our Responsibility!				
Consumer-Led Transformation (CLT) - SAS, County drives)				
Infrastructure Development (Cages & Bins)				
Recyclers contracts				
Reverse Logistics				
Docuseries, Champions of Change				
KEPRO Youth chapter (Schools & Churches)				
Waste Picker Integration (Toolkit V2, Capacity Building)				
Waste Recovery Drives (Cleanups & EROs)				
Value for and Beyond Compliance				
Health & Safety for WMOs (PPEs and Tools)				
Member Visits and Townhall Sessions				
ESG readiness				
Accelerator programs				
Newsletter & quarterly reports				

KEPRO Contracted Recyclers - Waste Transport Schedule

KEPRO Contracted Recyclers - Waste Transport Schedule

Collection Point Name	Frequency	Route	Source/Origin(s)	Destination(s)	Type(s) of packaging waste
Industrial Area (Road B)	Daily	Mombasa Road	Industrial area	Athi River - Recycler	PET
Near EPZA Thika	Daily	Thika Road	Thika	Athi River - Recycler	PET
MLOLONGO	TWICE IN A WEEK	MLOLONGO	MLOLONGO	Kikuyu - Recycler	LDPE / HDPE BAGS
KITENGELA TOWN	TWICE IN A WEEK	KITENGELA TOWN	KITENGELA	Kikuyu - Recycler	PP SACKS
DANDORA DUMPSITE	TWICE IN A WEEK	DANDORA DUMPSITE	DANDORA	Kikuyu - Recycler	NON - WOVEN
TASSIA	TWICE IN A WEEK	TASSIA	EMBAKASI - PIPELINE	Kikuyu - Recycler	NON - WOVEN
KAYOLE JUNCTION	TWICE IN A WEEK	KAYOLE JUNCTION	KAYOLE JUNCTION	Kikuyu - Recycler	LDPE / HDPE BAGS
KANGUNDO ROAD	TWICE IN A WEEK	KANGUNDO ROAD	KAYOLE	Kikuyu - Recycler	BOPP BAGS
INDUSTRIAL AREA	TWICE IN A WEEK	INDUSTRIAL AREA	LUNGALUNGA	Kikuyu - Recycler	NON - WOVEN
RIRUTA	TWICE IN A WEEK	RIRUTA	KAWANGWARE-NAIVASHA RI	Kikuyu - Recycler	LDPE / HDPE BAGS
EMBAKASI NORTH	TWICE IN A WEEK	EMBAKASI NORTH	EMBAKASI - PIPELINE	Kikuyu - Recycler	LDPE / HDPE BAGS
DAGORETTI MARKET	TWICE IN A WEEK	DAGORETTI MARKET	DAGORETTI	Kikuyu - Recycler	NON - WOVEN
KAJIADO TOWN	TWICE IN A WEEK	KAJIADO TOWN	NJIRU/MURANGA KANGEMI/VIKWATANI	Kikuyu - Recycler	LDPE / HDPE BAGS
DAGORETTI - WAITHAKA	TWICE IN A WEEK	DAGORETTI - WAITHAKA	DAGORETTI,KAWANGWARE,SATELLITE	Kikuyu - Recycler	PP SACKS
KAYOLE JUNCTION	TWICE IN A WEEK	KAYOLE JUNCTION	KAYOLE JUNCTION	Kikuyu - Recycler	BOPP BAGS
SHAMBAB	TWICE IN A WEEK	SHAMBAB	NAKURU-	Kikuyu - Recycler	NON - WOVEN
NORTH AIRPORT ROAD	TWICE IN A WEEK	NORTH AIRPORT ROAD	EMBAKASI - PIPELINE	Kikuyu - Recycler	PP SACKS
FREE AREA	TWICE IN A WEEK	FREE AREA	NAKURU	Kikuyu - Recycler	NON - WOVEN
KASARANI	TWICE IN A WEEK	KASARANI	KASARANI	Kikuyu - Recycler	NON - WOVEN
LUCKER SUMMER/BABADOGO	TWICE IN A WEEK	LUCKER SUMMER/BABADOGO	KASARANI	Kikuyu - Recycler	NON - WOVEN
ATHI RIVER	TWICE IN A WEEK	ATHI RIVER	ATHI RIVER	Kikuyu - Recycler	LDPE / HDPE BAGS
KAYOLE JUNCTION	TWICE IN A WEEK	KAYOLE JUNCTION	KAYOLE JUNCTION	Kikuyu - Recycler	LDPE / HDPE BAGS
DUMPSITE	TWICE IN A WEEK	DUMPSITE	DANDORA	Kikuyu - Recycler	PP WASTE
AWASI	TWICE IN A WEEK	AWASI	MHORONI	Kikuyu - Recycler	LDPE / HDPE BAGS
MANGU ROAD	TWICE IN A WEEK	MANGU ROAD	THIKA	Kikuyu - Recycler	PP SACKS
ZIWANI	TWICE IN A WEEK	ZIWANI	NAIROBI	Kikuyu - Recycler	PP WASTE / HDPE
SASIA ROAD	TWICE IN A WEEK	SASIA ROAD	INDUSTRIAL AREA OFF SASIA ROAD	Kikuyu - Recycler	LDPE / HDPE BAGS
INDUSTRIAL AREA	TWICE IN A WEEK	INDUSTRIAL AREA	NAIROBI	Kikuyu - Recycler	PP SACKS
GITARU	TWICE IN A WEEK	GITARU	KIKUYU	Kikuyu - Recycler	PP WASTE
REDHILL LIMURU	TWICE IN A WEEK	REDHILL LIMURU	LIMURU	Kikuyu - Recycler	LDPE / HDPE BAGS
NAIROBI	TWICE IN A WEEK	NAIROBI	ZIMMERMAN	Kikuyu - Recycler	PP WASTE
EPZ - ATHIRIVER	TWICE IN A WEEK	EPZ - ATHIRIVER	ATHI RIVER	Kikuyu - Recycler	PP SACKS
COMMERCIAL STREET	TWICE IN A WEEK	COMMERCIAL STREET	NAIROBI	Kikuyu - Recycler	LDPE / HDPE BAGS
KIUONDOO - LANET	TWICE IN A WEEK	KIUONDOO - LANET	NAKURU / NYAHURURU	Kikuyu - Recycler	NON - WOVEN
INDUSTRIAL AREA	TWICE IN A WEEK	INDUSTRIAL AREA	MUKURU REUBEN / MLOLONGO	Kikuyu - Recycler	PP WASTE / LDPE
Bombolulu	5 times a month	Bombolulu-Kiangombe	Bombolulu	Mombasa Road - Recycler	Rigids
Malindi	3 times a month	Malindi- Sameer	Malindi	Mombasa Road - Recycler	PET
Kisii	9 times a month	Kisii-Kiangombe	Kisii	Mombasa Road - Recycler	Rigids
Migori	4 times a month	Migori-Kiangombe	Migori	Mombasa Road - Recycler	Rigids
Nakuru	4 times a month	Nakuru-Kiangombe	Nakuru	Mombasa Road - Recycler	PET
Kondole	6 times a month	Kisumu-Kiangombe	Kisumu	Mombasa Road - Recycler	Rigids
Langas	3 times a month	Eldoret-Kisumu	Eldoret	Mombasa Road - Recycler	Rigids
Siaya	4 times a month	Siaya-Kisumu	Siaya	Mombasa Road - Recycler	PET
Langas	6 times a month	Eldoret-Kiangombe	Eldoret	Mombasa Road - Recycler	Rigids
Maua	5 times a month	Maua-Kiangombe	Maua	Mombasa Road - Recycler	Rigids
Machakos	3 times a month	Machakos-Kiangombe	Machakos	Mombasa Road - Recycler	Rigids



KEPRO Contracted Recyclers - Waste Transport Schedule

Embu	3 times a month	Embu-Kiangombe	Embu	Mombasa Road - Recycler	Rigids
Kibera	2 times a month	Kibera Ayany-Kiangombe	Kibera Ayany	Mombasa Road - Recycler	Rigids
Narok	2 times a month	Narok-Kiangombe	Narok	Mombasa Road - Recycler	PET
Kakamega	4 times a month	Kakamega-Kisumu	Kakamega	Mombasa Road - Recycler	Rigids
Kisauni	3 times a month	Kisauni-Bombolulu	Kisauni	Mombasa Road - Recycler	Rigids
Likoni	5 times a month	Likoni-Bombolulu	Likoni	Mombasa Road - Recycler	Rigids
Malindi	3 times a month	Malindi-Bombolulu	Malindi	Mombasa Road - Recycler	Rigids
VOK	2 times a month	VOK-Bombolulu	VOK	Mombasa Road - Recycler	Rigids
Mwakirunge	6 times a month	Mwakirunge-Bombolulu	Mwakirunge	Mombasa Road - Recycler	PET
Kilifi	4 times a month	Kilifi-Malindi	Kilifi	Mombasa Road - Recycler	Rigids
Dandora	Weekly	Eastlands	Dump site	Njiru - Recycler	Flexible Mono
Malindi	Weekly	Malindi Town	Aggregators	Mtwapa - Recycler	Flexible Mono
Malindi Dumpsite	Daily	Kilifi Town	Dump site	Mtwapa - Recycler	Flexible Mono
Mtwapa	Daily	Mombasa Town	Households, waste pickers	Mtwapa - Recycler	Flexible Mono
Naivasha	Weekly	Naivasha	Aggregator	Njiru - Recycler	Flexible Mono
Eldoret	Weekly or Monthly	Eldoret	Aggregators/agents	Njiru - Recycler	Woven, flexible mono
Kibos, Kisumu	Weekly	Kisumu	Aggregator	Njiru - Recycler	Flexible Mono
Ruiru	Daily	Ruiru	Aggregators	Njiru - Recycler	woven, flexible mono
Machakos	Daily	Machakos	Aggregators	Njiru - Recycler	Flexible Mono
Nanyuki	Monthly	Muranga/Nanyuki	Aggregators/Agents	Njiru - Recycler	Flexible Mono
Thindigua	Daily	Kiambu	Aggregator/households	Njiru - Recycler	Flexible laminates, flexible mono
Limuru Road, Parklands	Weekly	Limuru	Aggregator	Njiru - Recycler	Flexible Mono
Naivasha	Weekly	Nakuru	Aggregator	Njiru - Recycler	Flexible Mono
Dandora	Daily	Dandora	Dump site	Njiru - Recycler	Flexible laminates
Mwakirunge	2 WEEKS	ONE WAY	ABEL MWAKIRUNGE	Kisauni - Recycler	Flexible Mono
Vikwatani	2 WEEKS	ONE WAY	AHMEDI	Kisauni - Recycler	Rigids
Mshomoroni	2 WEEKS	ONE WAY	ALEX	Kisauni - Recycler	Flexible Mono
BAMBURI	2 WEEKS	ONE WAY	ASGAR	Kisauni - Recycler	Rigids
BANGLA	2 WEEKS	ONE WAY	ASMA BAKARANI	Kisauni - Recycler	Rigids
CBD	2 WEEKS	ONE WAY	BASWETI MONICA	Kisauni - Recycler	Flexible Mono
CHANGAMWE	2 WEEKS	ONE WAY	BRITRACE	Kisauni - Recycler	Rigids
DIANI	2 WEEKS	ONE WAY	CATHERINE MUSYOKI	Kisauni - Recycler	Flexible Mono
MAJENGO	2 WEEKS	ONE WAY	CHARLES MAJENGO TOWN	Kisauni - Recycler	Rigids
Mtwapa	2 WEEKS	ONE WAY	CHIEF MTWAPA	Kisauni - Recycler	Rigids
KILIFI TOWN	2 WEEKS	ONE WAY	CHOKORA GEORGE KINJA	Kisauni - Recycler	Rigids
KISAUNI	2 WEEKS	ONE WAY	CHRISTINE HAKIKA	Kisauni - Recycler	Rigids
JOMVU	2 WEEKS	ONE WAY	DAVID NJAGI	Kisauni - Recycler	Rigids
KIEMBENI	2 WEEKS	ONE WAY	DENIS MULEI	Kisauni - Recycler	Rigids
CHANGAMWE	2 WEEKS	ONE WAY	DENIS MURITHI CHANGMWE	Kisauni - Recycler	Rigids
JOMVU	2 WEEKS	ONE WAY	DOMINIC JOMVU	Kisauni - Recycler	Rigids
MIRITINI	2 WEEKS	ONE WAY	DOMINIC KARIM MIRITINI	Kisauni - Recycler	Rigids
WATAMU	2 WEEKS	ONE WAY	DOMINIC WATAMU	Kisauni - Recycler	Flexible Mono
VIKWATANI	2 WEEKS	ONE WAY	EDINA EDENAH MUEMA	Kisauni - Recycler	Rigids
CHANGAMWE	2 WEEKS	ONE WAY	ELIUD CHANGAMWE	Kisauni - Recycler	Rigids
SHANZU	2 WEEKS	ONE WAY	ELIZA SHANZU	Kisauni - Recycler	Rigids
BAMBURI	2 WEEKS	ONE WAY	EMMANUEL MBAJI	Kisauni - Recycler	Rigids
KILIFI	2 WEEKS	ONE WAY	ERICK KILIFI	Kisauni - Recycler	Rigids
BANGLA	2 WEEKS	ONE WAY	ESTHER	Kisauni - Recycler	Rigids

KEPRO Contracted Recyclers - Waste Transport Schedule

VOK	2 WEEKS	ONE WAY	FEDRICK SIONGO	Kisauni - Recycler	Rigids
KILIFI	2 WEEKS	ONE WAY	GEORGE KILIFI	Kisauni - Recycler	Rigids
Mshomoroni	2 WEEKS	ONE WAY	HASHIM OMUMIA	Kisauni - Recycler	Flexible Mono
MALINDI	2 WEEKS	ONE WAY	HUSSAIN DERI VOLTER	Kisauni - Recycler	Flexible Mono
KILIFI	2 WEEKS	ONE WAY	ISACK RIKURA	Kisauni - Recycler	Rigids
JOMVU	2 WEEKS	ONE WAY	ISAYA	Kisauni - Recycler	Rigids
UKUNDA	2 WEEKS	ONE WAY	JECINTA	Kisauni - Recycler	Rigids
CHANGAMWE	2 WEEKS	ONE WAY	JOHN CHANGAMWE JOHN NGUMBAU	Kisauni - Recycler	Rigids
KILIFI	2 WEEKS	ONE WAY	JOSPHEAT NJUGUNA KILIFI	Kisauni - Recycler	Rigids
Kisauni	2 WEEKS	ONE WAY	JULIUS M KYALO	Kisauni - Recycler	Flexible Mono
MIRITNI	2 WEEKS	ONE WAY	JULIUS MIRITNI	Kisauni - Recycler	Rigids
CBD	2 WEEKS	ONE WAY	KANGETHE NATHANIEL NCHUNGE	Kisauni - Recycler	Rigids
KILIFI	2 WEEKS	ONE WAY	KASKIO KILIFI	Kisauni - Recycler	Rigids
MAJENGO	2 WEEKS	ONE WAY	KERIY NDOROGI MAJENGO	Kisauni - Recycler	Rigids
KIEMBENI	2 WEEKS	ONE WAY	KIEMBENI JUMA ARONI	Kisauni - Recycler	Flexible Mono
MAJNEGO	2 WEEKS	ONE WAY	KINYWA	Kisauni - Recycler	Rigids
MALINDI	2 WEEKS	ONE WAY	LAWRENCE MAINA	Kisauni - Recycler	Rigids
MATSWANGONI	2 WEEKS	ONE WAY	LEONARD	Kisauni - Recycler	Rigids
MIRITINI	2 WEEKS	ONE WAY	LEVA BAMBOLULU CHIEF	Kisauni - Recycler	Rigids
VOK	2 WEEKS	ONE WAY	MAINA JOSEPH NDIRITU	Kisauni - Recycler	Flexible Mono
WATAMU	2 WEEKS	ONE WAY	MAJAONI WASTE	Kisauni - Recycler	Flexible Mono
ZAMBARAUNI	2 WEEKS	ONE WAY	MAMA STELLA SALOME WANGUI MUCHI	Kisauni - Recycler	Flexible Mono
MIRITINI	2 WEEKS	ONE WAY	MARY MIRITINI	Kisauni - Recycler	Rigids
BANGLA	2 WEEKS	ONE WAY	MAXWELL BANGLA	Kisauni - Recycler	Rigids
	2 WEEKS	ONE WAY	MIRITON SHARIANI	Kisauni - Recycler	Rigids
MTWAPA	2 WEEKS	ONE WAY	MURITHI MTWAPA	Kisauni - Recycler	Rigids
CHANGAMWE	2 WEEKS	ONE WAY	MUSA GEORGE CHANGAMWE	Kisauni - Recycler	Rigids
MTWAPA	2 WEEKS	ONE WAY	MWANGI MTWAPA	Kisauni - Recycler	Rigids
	2 WEEKS	ONE WAY	NAHASON	Kisauni - Recycler	Rigids
KILIFI	2 WEEKS	ONE WAY	NDUNGU KILIFI	Kisauni - Recycler	Rigids
KISIMANI	2 WEEKS	ONE WAY	NGENE MULU	Kisauni - Recycler	Rigids
KONGOWEA	2 WEEKS	ONE WAY	NGUGI	Kisauni - Recycler	Flexible Mono
KWABULO	2 WEEKS	ONE WAY	PAMELA CHEMBARI	Kisauni - Recycler	Rigids
MAGONGO	2 WEEKS	ONE WAY	PASCAL G. WANYAMA	Kisauni - Recycler	Rigids
MAJAONI	2 WEEKS	ONE WAY	PASTA KONGOWEA DAVID	Kisauni - Recycler	Flexible Mono
WATAMU	2 WEEKS	ONE WAY	PATRICK WATAMU	Kisauni - Recycler	Flexible Mono
	2 WEEKS	ONE WAY	PAUL JOMBO	Kisauni - Recycler	Flexible Mono
MIRITINI	2 WEEKS	ONE WAY	PAULINE MIRITINI	Kisauni - Recycler	Rigids
MALINDI	2 WEEKS	ONE WAY	PETER MALINDI	Kisauni - Recycler	Flexible Mono
MSHOMORONI	2 WEEKS	ONE WAY	PHOEBE WAYODI	Kisauni - Recycler	Rigids
MTWAPA	2 WEEKS	ONE WAY	SALIMU TOPE	Kisauni - Recycler	Flexible Mono
CBD	2 WEEKS	ONE WAY	RUTH TOWN	Kisauni - Recycler	Rigids
BAMBURI	2 WEEKS	ONE WAY	SERO BAMBURI	Kisauni - Recycler	Rigids
MWAKIRUNGE	2 WEEKS	ONE WAY	SIMON WANGUI	Kisauni - Recycler	Rigids
PIRATES BEACH	2 WEEKS	ONE WAY	STEVE MATSWAGONI	Kisauni - Recycler	Rigids
SHANZU	2 WEEKS	ONE WAY	TITO	Kisauni - Recycler	Rigids
UKUNDA	2 WEEKS	ONE WAY	UKUNDA OLD	Kisauni - Recycler	Rigids
SHARIANI	2 WEEKS	ONE WAY	UTANGE CRISPUS MWARINGA KAZUNGU	Kisauni - Recycler	Flexible Mono

KEPRO Contracted Recyclers - Waste Transport Schedule

TOWN	2 WEEKS	ONE WAY	VICTOR GEDET	Kisauni - Recycler	Flexible Mono
UKUNDA	2 WEEKS	ONE WAY	VINCENT ZAMBARAUNI	Kisauni - Recycler	Flexible Mono
KILIFI	2 WEEKS	ONE WAY	WAHOME KILIFI	Kisauni - Recycler	Rigids
VIKWATANI	2 WEEKS	ONE WAY	WANJARA VIKWATANI	Kisauni - Recycler	Rigids
UTANGE	2 WEEKS	ONE WAY	WASTE TO WORK	Kisauni - Recycler	Rigids
Kayole	Weekly	Nairobi	Kayole	Dandora - Recycler	PE,HDPE,LDPE,PP
Njiru	Weekly	Nairobi	Njiru	Dandora - Recycler	PE,HDPE,LDPE,PP
Kayole	Weekly	Nairobi	Kayole	Dandora - Recycler	PE,HDPE,LDPE,PP
Dandora	Weekly	Nairobi	Dandora	Dandora - Recycler	PE,HDPE,LDPE,PP
Dandora	Weekly	Nairobi	Dandora	Dandora - Recycler	PE,HDPE,LDPE,PP
Dandora	Weekly	Nairobi	Dandora	Dandora - Recycler	PE,HDPE,LDPE,PP
Kitengela	Weekly	Machakos	Kitengela	Dandora - Recycler	PE,HDPE,LDPE,PP
Industrial Area	Weekly	Nairobi	Industrial Area	Dandora - Recycler	PE,HDPE,LDPE,PP
Kisumu	Weekly	Kisumu	Kisumu	Dandora - Recycler	PE,HDPE,LDPE,PP
Nairobi industrial Area	Weekly	Nairobi	Opposite Express	Dandora - Recycler	PE,HDPE,LDPE,PP
Kang'oki Dumpsite	Weekly	Kiambu	Kang'oki Dumpsite	Dandora - Recycler	PE,HDPE,LDPE,PP
Naivasha	Weekly	Nakuru	Naivasha	Dandora - Recycler	PE,HDPE,LDPE,PP
Airtel Nairobi	3 times a week	Nairobi - Kangóki. Makongeni	Airtel Nairobi	Thika - Recycler	PET
Ehothia mateial recovery facility	weekly	Limuru	Ehothia	Kiambu - Recycler	Flexible and Rigid plastic
Mombasa Buyback Centre	weekly	Msa-Nrb highway	Mombasa	Kiambu - Recycler	Flexible and Rigid plastic
Mombasa MRF	weekly	Msa-Nrb highway	Mombasa	Kiambu - Recycler	Flexible and Rigid plastic
Mowlem Buyback Centre	weekly	Outering	Mowlem	Kiambu - Recycler	Flexible and Rigid plastic
Nakuru Buyback Centre	weekly	Nrb-Nkr highway	Nakuru	Kiambu - Recycler	Flexible and Rigid plastic
Thika Buyback Centre	weekly	Thika Road	Thika	Kiambu - Recycler	Flexible and Rigid plastic