



# National Action Plan to End Plastic Pollution in The Gambia

October 2024



### This report was prepared by Common Seas in collaboration with the Government of The Gambia.

It supports the mission of The National Environment Agency (NEA) to ensure that The Gambia's environment and natural resources are sustainably managed and conserved for the benefit of all, including future generations – and to increase resilience to climate change.

It underpins the NEA's strong efforts to promote the wellbeing of Gambians through strengthening evidence-based management of natural resources and ecosystems and addressing the threat of plastic pollution to biodiversity.

Additionally, it aids the NEA's objectives to build institutional leadership capacities, enhance stakeholder participation in natural resources management, and strengthen the country's institutional framework to protect people and communities.

#### Common Seas

Common Seas drives systemic change, creating partnerships to design and deliver resources and solutions that stop the flow of plastic pollution.

Our programmes are centred on

- Leading policy changes through partnerships with governments, providing technical expertise and convening the right stakeholders for action.
- Commissioning research and raising awareness of the human health impacts of plastics to inspire and motivate change.
- Empowering and equipping children, through their schools, to stop the flow of plastic pollution.

We work with countries that are most affected by plastic, particularly SIDS and developing coastal economies, supporting a just transition to a future freed from plastic pollution.

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### I am delighted to introduce the *National Action Plan to end plastic pollution in The Gambia.*

Developed in collaboration with Common Seas, it aims to promote the well-being of Gambians by setting out a strategy to reduce The Gambia's annual plastic pollution by 86 percent over the next ten years.

This National Action Plan comes at a time when country-wide action against plastic pollution is urgently needed. Plastic production is projected to double by 2030, with pollution from uncontrolled plastic waste choking our rivers and seas. That's why we're taking strong action now to reduce plastic pollution across The Gambia.

We also have a strong commitment to, and an important role to play in, international efforts to negotiate a robust Global Plastics Treaty, and the policies outlined in this plan will help us deliver on our obligations to address environmental challenges.

Our successful implementation of this National Action Plan is a key step in paving the way for a resilient future, in preparation for an international treaty that will address cross-border challenges.

The Gambia has already developed a wide range of policies aimed at safeguarding our natural world. In 2007, we enacted the Anti Littering Regulation to limit littering of plastics and other waste, and this was followed by the Plastic Bag Order in 2015 to prohibit the importation, sale, manufacture, and use of single use plastic bags.

We have also undertaken practices to maintain biodiversity, and under a new initiative led by the UN Environment Programme, have developed legal, institutional, and policy frameworks needed to protect our valuable ecosystems.

Our willingness to undertake the actions outlined in this action plan is a clear indication of the high priority we place on the reduction, and eventual elimination, of plastic pollution and the effective management of plastic waste.

The Gambia has always taken a progressive position and shown great leadership in mobilizing worldwide efforts to tackle climate change by calling on all responsible countries to take proportional actions.

However, there is still much to do, and plastic pollution still persists as a major problem. While a broad plastics treaty will address the problem of plastic pollution at a global level, this plan is specific to the problems seen in The Gambia and will provide us with the strategies needed to tackle our own pollution.

We are proud to show our commitment to this action plan – a meaningful example of The Gambia's focus on finding ambitious and holistic solutions to finally turning the tide on plastic pollution.

**H.E. President Adama Barrow**  
President of the Republic of The Gambia

## Preface by the Honourable Minister from Meccnar

### Welcome to the National Action Plan to end plastic pollution in The Gambia, prepared in collaboration with Common Seas and the government of The Gambia.

This action plan will support the mission of The Ministry of Environment, Climate Change and Natural Resources to ensure that The Gambia's environment and natural resources are sustainably managed and conserved for the benefit of all, including future generations.

The United Nations is working towards a Global Plastics Treaty to end plastic pollution. Developing a comprehensive National Action Plan further cements The Gambia's role in negotiating a robust UN Global Plastics Treaty and places us amongst the most ambitious and forward-looking countries in our global efforts to minimise the damage that plastic pollution wreaks on our oceans, environment, and health.

Underscoring this National Action Plan is a comprehensive analysis of The Gambia's current plastic usage and plastic waste generation undertaken by Common Seas' Plastic Drawdown tool. This UN-endorsed analysis tool found that, without action, plastic waste generation in The Gambia is expected to increase by 42 percent by 2033.

As a result, five strategies have been identified for implementation through a comprehensive cross-sector engagement process including a workshop with the local community, waste management professionals and government ministers. These five strategies have the potential to reduce plastic pollution by 86 percent in The Gambia over ten years compared to the business-as-usual approach.

The first strategy set out in the National Action Plan is set to eradicate single-use plastic carrier bags by reinvigorating the existing 2015 ban on plastic bags through education and engagement campaigns and increased resourcing for enforcement of the existing ban.

This collaboration has also identified, that alongside plastic shopping bags, other plastic items including water bags are a key waste stream in The Gambia that must be addressed. These bags present a high risk to the environment as they are lightweight, generated in large numbers, and often bought 'on-the-go' for immediate consumption of the liquid inside. This second strategy will include a ban on small single-use plastic bags with a three-year lead-in period to ensure stallholders have enough time to source sustainable alternatives.

The third strategy builds on the government's commitment to ensuring all Gambians have access to safe drinking water and a healthy environment. By weight, single-use plastic water bottles are one of the most significant plastic waste items in The Gambia. Strategy three is therefore to introduce a ban on single-use plastic bottles and implement a Deposit Return Scheme for all other plastic bottles that are not covered by the ban.

The strategy also addresses the important work of the informal sector that collects and resells single-use plastic bottles. The government will ensure their involvement in the design of legislation and consider their role in reuse and recycling to ensure the new legislation does not affect them negatively.

The Gambia has a thriving 'on the go' sector so consumers can buy food and drink to be consumed during the day, however this produces large amounts of plastic waste from items such as plastic takeaway boxes, cutlery and straws.

Policy four therefore addresses the needs of vendors and consumers, both locals and tourists, whilst protecting the environment with a phased-in ban after a one-year period on selected single-use plastic food and drink packaging items and introduces a charge on those single-use plastic food and drink packaging items that are not banned.

The final strategy is focused on improving solid waste collection and management in both rural and urban areas, taking inspiration from regions where collections are already in place. In The Gambia, informal workers are central to the delivery of key services and again, this National Action Plan identifies and recognises their importance for this policy.

This National Action Plan complements the Ministry's objectives to build institutional leadership capacities, enhance stakeholder participation in natural resources management; and strengthen the country's institutional framework to protect people and communities. The government of The Gambia is committed to creating a better environment for the future of our country, our citizens and all life that thrives in our seas.

#### Hon. Rohey John Manjang

Minister of Environment, Climate Change and Natural Resources

## Acknowledgement by the Executive Director of the NEA

### The government of The Gambia and the Ministry of Environment, Climate Change and Natural Resources gratefully acknowledges the work of Common Seas, the National Environment Agency (NEA), the NAP Steering Committee and wider consultees to develop this National Action Plan to tackle plastic pollution in The Gambia.

This comprehensive document was possible due to the generous support of the International Union for the Conservation of Nature, which provided access to primary data from the Plastic Waste Free Islands initiative, which was vital in the analysis contained in this report.

Direct involvement from ministers and government departments has been central to this process, with thanks to the Office of the President, Ministries including Agriculture, Health, Justice, Police Force, and Community Development as well as input from Omar BJ Touray, Banjul City Council, Dodou Jallow Kanifing Municipal Council, Mansakonko Area Council, Kerewan Area Council, Basse Area Council, Janjangbureh Area Council, Kuntaur Area Council, Brikama Area Council.

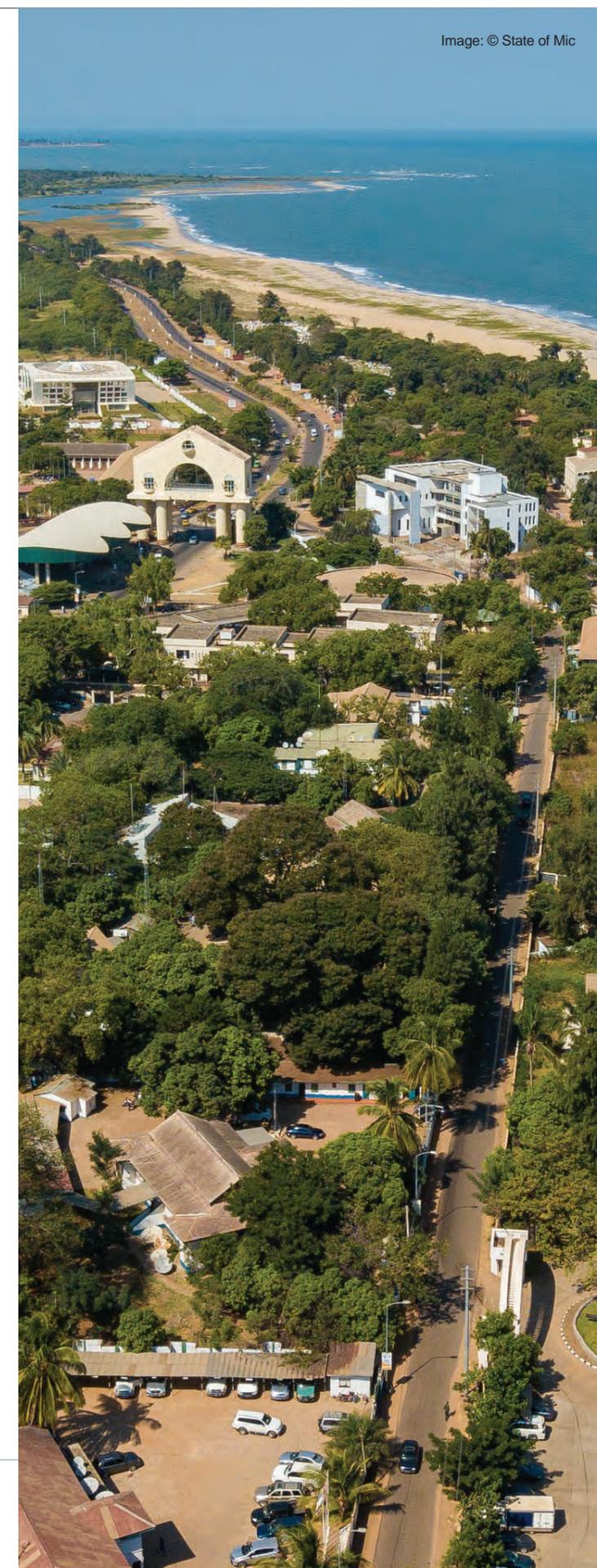
Wider consultees including Modou Mbaye, M & M Plastic Manufacturing Limited, Sukai Cham, TARUD, Ousman Manneh, UAid Foundation, Silvia Gracia, Mbolo Association, Muhammed Nyass, Gambia Ocean Heroes, Mariama Tunkara, Women Initiative Gambia, Lamin Fadera, National Water and Electricity Company gave their expertise to shape this National Action Plan.

The staff from across government, councils and wider stakeholders gave, as usual, dedication and commitment to information sharing and collaborating, becoming integral to accomplishing this final report. Finally, recognition goes to the team from Common Seas including Jo Royle, Carla Worth, Charlotte Spinazzé-Bourgoin, Patrick Mahon and Ingrid Henrys who worked in collaboration with all the individuals and organisations above to create the National Action Plan to end plastic pollution in The Gambia.

#### Dr. Dawda Badjie

Executive Director - National Environment Agency

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## Contents

<b>8</b>	<b>Key Messages</b>
<b>10</b>	<b>Executive Summary</b>
<b>20</b>	<b>Introduction</b>
<b>24</b>	<b>Approach</b>
<b>28</b>	<b>Baseline Assessment of Plastic Pollution</b>
	<ul style="list-style-type: none"> <li>• Plastic Waste Generation</li> <li>• Plastic Flows</li> <li>• Plastic Pollution</li> <li>• Summary of Plastic Policies &amp; Regulations</li> </ul>
<b>48</b>	<b>National Action Plan to Tackle Plastic Pollution</b>
	<ul style="list-style-type: none"> <li>• Enabling Initiatives</li> <li>• Future recommendations</li> </ul>
<b>100</b>	<b>Roadmap for The Gambia</b>
<b>102</b>	<b>Institutional Arrangements to Implement</b>
	<ul style="list-style-type: none"> <li>• Summary of Governance/Key roles to implement</li> <li>• Monitoring &amp; Evaluation</li> <li>• Financing</li> <li>• Dissemination</li> </ul>
<b>113</b>	<b>Final Remarks</b>
<b>114</b>	<b>Acknowledgments</b>
<b>116</b>	<b>References and Glossary of Terms</b>
<b>119</b>	<b>List of Appendices</b>

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## List of Figures

<b>13</b>	<b>Figure 1:</b> Top 6 waste items generated by weight (kT) 202	<b>38</b>	<b>Figure 14:</b> Domestic mismanaged waste
<b>13</b>	<b>Figure 2:</b> How much plastic waste is there per item today and in the future?	<b>39</b>	<b>Figure 15:</b> Enters building waste pipe
<b>29</b>	<b>Figure 3:</b> Total plastic leaking into the aquatic environment	<b>40</b>	<b>Figure 16:</b> Sources of ocean plastic pollution (2021)
<b>29</b>	<b>Figure 4:</b> Managed vs mismanaged waste entering terrestrial and aquatic environments in 2021 and in 2033	<b>41</b>	<b>Figure 17:</b> Plastic waste escaping into the ocean (2021)
<b>30</b>	<b>Figure 5:</b> Waste generated by plastic item (tonnes) in 2021	<b>41</b>	<b>Figure 18:</b> Top 5 items by weight (kT) 2021
<b>31</b>	<b>Figure 6:</b> Top 5 (%) plastic items polluting the ocean (2021)	<b>49</b>	<b>Figure 19:</b> Shows the impacts of policies modelled within Strategy 1
<b>31</b>	<b>Figure 7:</b> Top 5 items by weight (kT) 2021	<b>55</b>	<b>Figure 20:</b> Shows the impacts of policies modelled within Strategy 2
<b>33</b>	<b>Figure 8:</b> Growth in estimated plastic waste generation over time	<b>61</b>	<b>Figure 21:</b> Shows the impacts of policies modelled within Strategy 3
<b>33</b>	<b>Figure 9:</b> Top 5 items by quantity 2021	<b>71</b>	<b>Figure 22:</b> Shows the impacts of policies modelled within Strategy 4
<b>34</b>	<b>Figure 10:</b> Managed vs mismanaged waste in 2021 and in 2033	<b>77</b>	<b>Figure 23:</b> Shows the impact of policies modelled within Strategy 5
<b>35</b>	<b>Figure 11:</b> Plastic flow diagram for The Gambia	<b>101</b>	<b>Figure 24:</b> Summary of Governance Arrangements
<b>36</b>	<b>Figure 12:</b> Managed vs mismanaged waste entering terrestrial and aquatic environments in 2021 and in 2033	<b>104</b>	<b>Figure 25:</b> Monitoring & Evaluation
<b>38</b>	<b>Figure 13:</b> Domestic managed waste	<b>105</b>	<b>Figure 26:</b> Indicator tiers

## Key messages

- 1 **An estimated 22.8 thousand tonnes of plastic waste was generated in The Gambia in 2021 – that is the equivalent weight of about 23 cargo ships.**

This is expected to increase by approximately 42% over the next ten years.

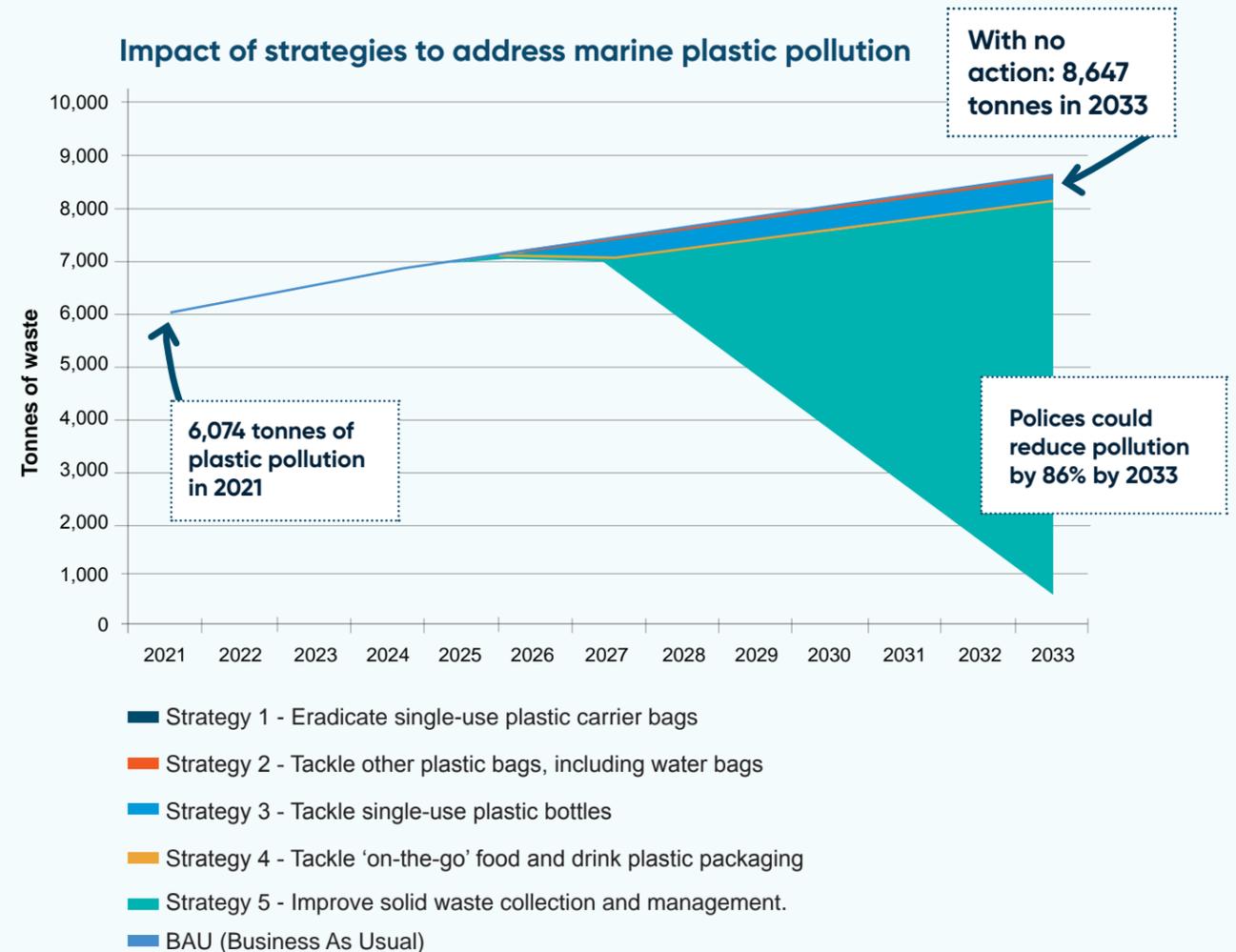
- 2 **Of this, 17.2 thousand tonnes (75.5%) leaked directly into the environment – polluting our beautiful land and sea.**

This is made up of largely avoidable and unnecessary plastic items, such as plastic bottles (both beverage and non-beverage), plastic bags (including small water bags and carrier bags), takeaway food containers, as well as construction waste, tyre wear, and microbeads.

- 3 **The Gambia is responding to this urgency by putting together a comprehensive National Action Plan to end plastic pollution.**

This will build upon existing initiatives, while simultaneously putting forward ambitious new policies that will stop plastic pollution at source. In doing so, we will safeguard a clean and safe environment, free of plastic litter.

- 4 **The time to act is now. This document outlines five strategies that will reduce The Gambia's plastic pollution by 86% over 10 years.**



These strategies and policies have been developed in collaboration with key stakeholders, including government, business and civil society, who are motivated and supportive of the actions outlined. At a workshop facilitated by social enterprise, Common Seas, the strategies and policies were refined and broadly agreed for inclusion in this National Action Plan .

The National Action Plan will be embedded into the Government of The Gambia's programme of work, leading the charge in tackling plastic pollution in our country. This programme could become a global exemplar, demonstrating how a low-income economy can address plastic pollution.



## Executive summary

### By 2050, an estimated 12 billion tons of plastic waste is expected to be in landfills and the natural environment<sup>1</sup>.

Throughout its lifecycle, plastic threatens our climate, our oceans, our economies and even our bodies.

Addressing the plastic pollution problem is a key priority to safeguard biodiversity, protect communities and economies, and deliver the UN Sustainable Development Goals, in particular SDGs 12, 13, 14 and 15.

While a Global Plastics Treaty will help to address the many cross-boundary challenges related to plastic pollution, governments can still prioritise national action against plastic pollution today. This will pave the way for a more resilient and healthy future, in preparation for a legally binding treaty.

The Gambia is on the right track to do this, by prioritising the development of a National Action Plan to tackle plastic pollution. The Government's 2015 Ban on Plastic Bags Order further illustrates that The Gambia is on the right track.

In 2022, Common Seas entered into partnership with the National Environment Agency in The Gambia to understand the scale of the country's plastic pollution problem and identify and implement policies to tackle it.

Common Seas' Plastic Drawdown tool was used to analyse the problem and assess potential policy interventions that could reduce pollution and form part of an ambitious National Action Plan to tackle plastics pollution in The Gambia.

This report sets out the results, disclosing the finding that an estimated 22.8 thousand tonnes of plastic waste was generated in The Gambia in 2021 – of which 27% subsequently leaked into aquatic environments. Without action, plastic waste generation is expected to increase by 42% by 2033.

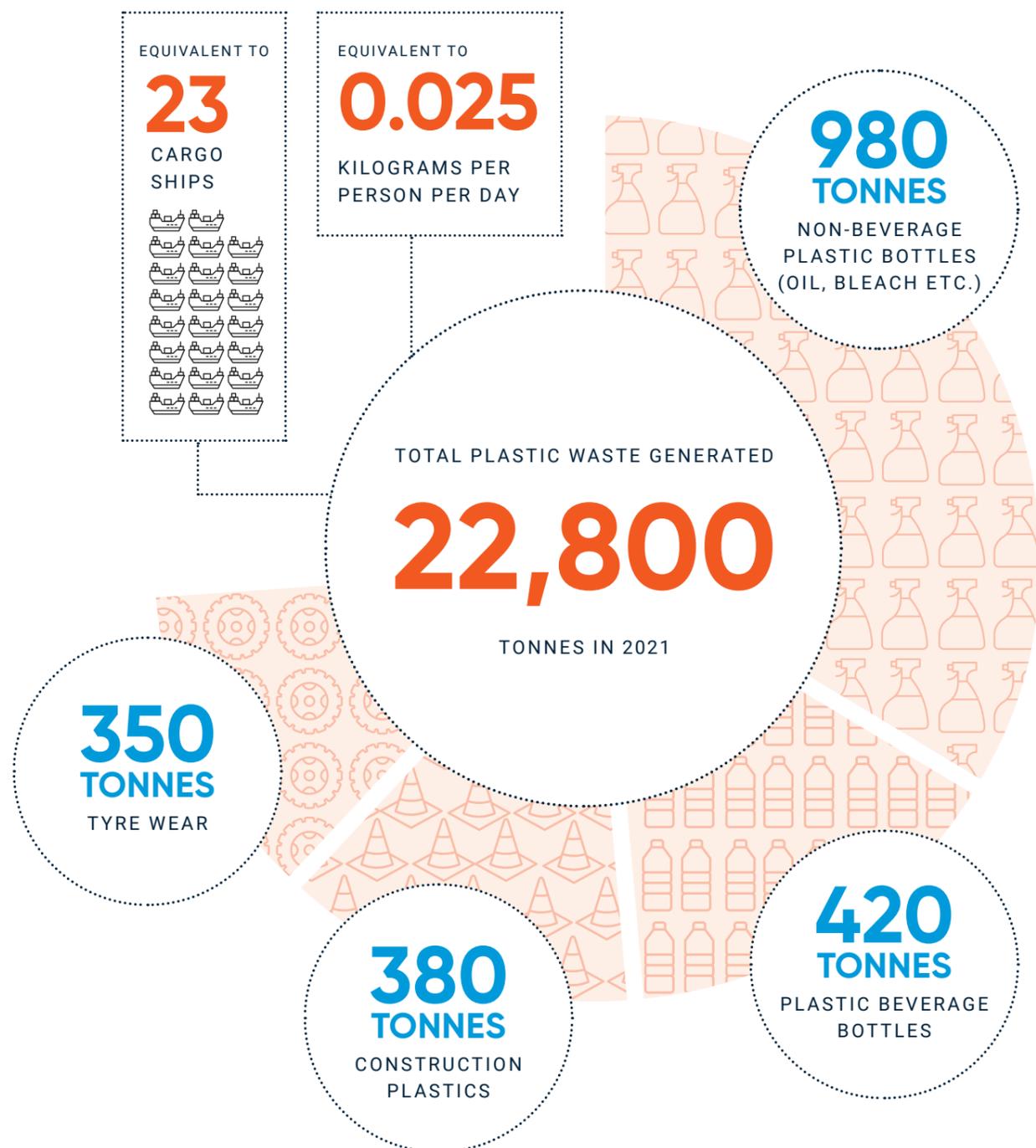
However, Common Seas' analysis suggests that by implementing the following five strategies, The Gambia annual plastic pollution could reduce by 86%. This involves eradicating single-use plastic carrier bags; tackling other plastics bags, including water bags; tackling single-use plastic bottles; confronting 'on-the-go' food and drink plastic packaging; and improving solid waste collection and management.

Developed in consultation with key government partners and a wider expert group of stakeholders (to ensure that the analysis is fully informed by the knowledge and expertise of those organisations and people most closely involved in the use and disposal of plastics in The Gambia), this report will form the basis of The Gambia's National Action Plan, a document that is likely to be required from each signatory to the Global Plastics Treaty.

<sup>1</sup> (OECD, 2022)

Image: © State of Mic

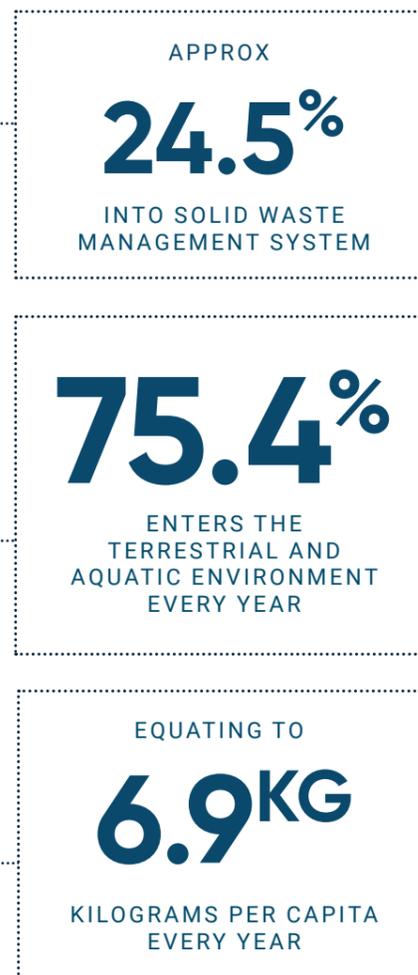
## How much plastic waste is The Gambia generating?



## What happens to The Gambia's plastic waste?

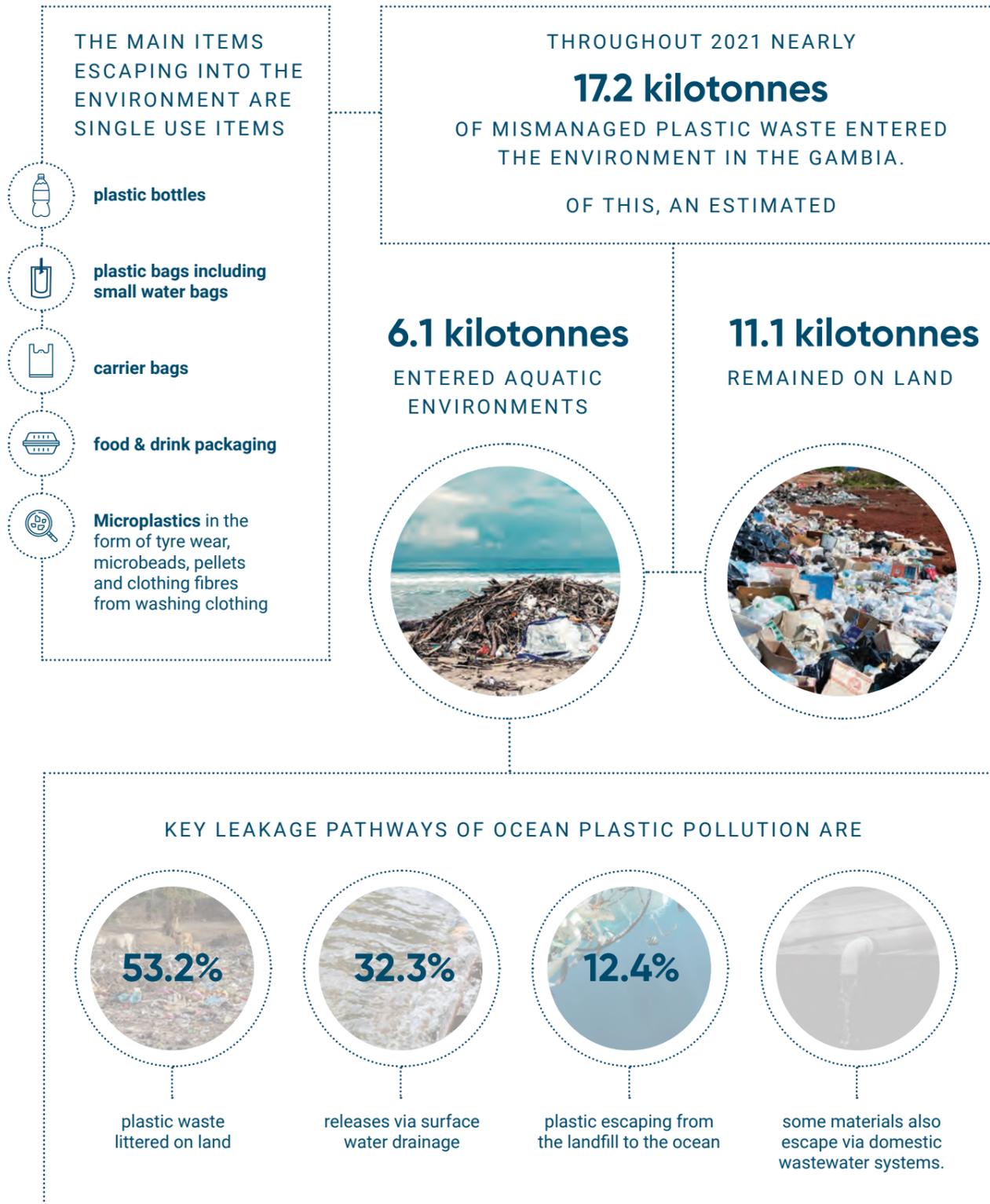
A minority of plastic waste generated in The Gambia enters the solid waste management system.

This means that 17.2 thousand tonnes of plastic waste enters the terrestrial and aquatic environment every year - equating to 6.9kg per capita of plastic waste disposed of subsequently leaking into the environment annually.



## Key findings

### How much plastic is entering our oceans?



### What is the trajectory to 2033?

- Plastic waste generation is expected to increase by 42% between 2021 and 2033.
- Without action, plastic waste leakage into the environment is also expected to increase by 42% by 2033 meaning that, cumulatively, an estimated 95 thousand tonnes of plastics will escape from The Gambia into rivers and the sea between now and 2033.

Figure 1: Top 6 waste items generated by weight (kT) 2021

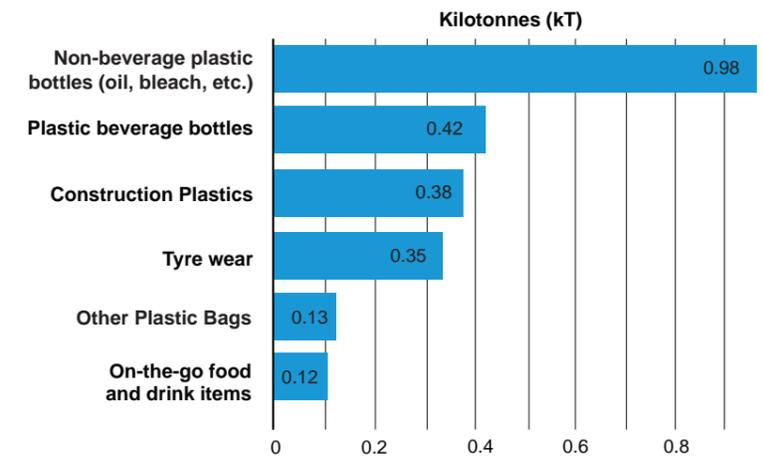


Figure 2: How much plastic waste is there per item today and in the future?

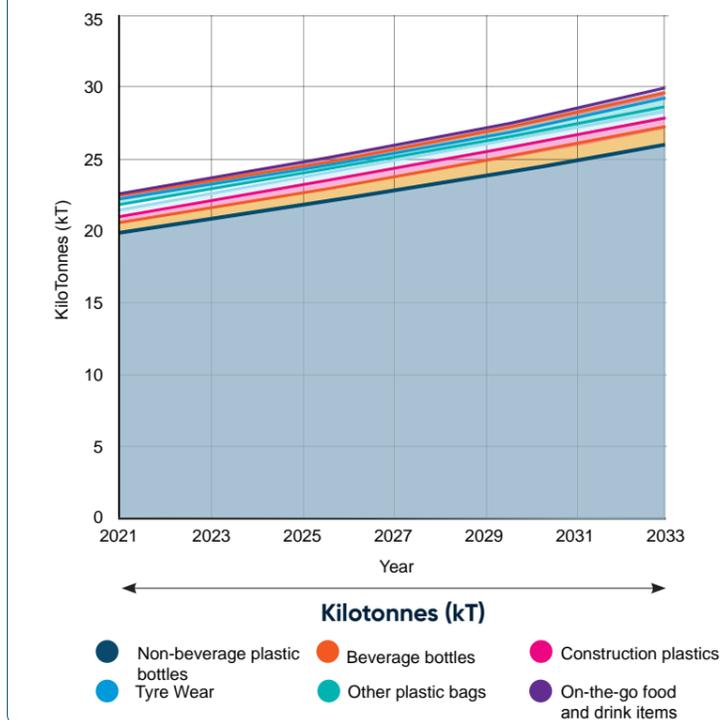


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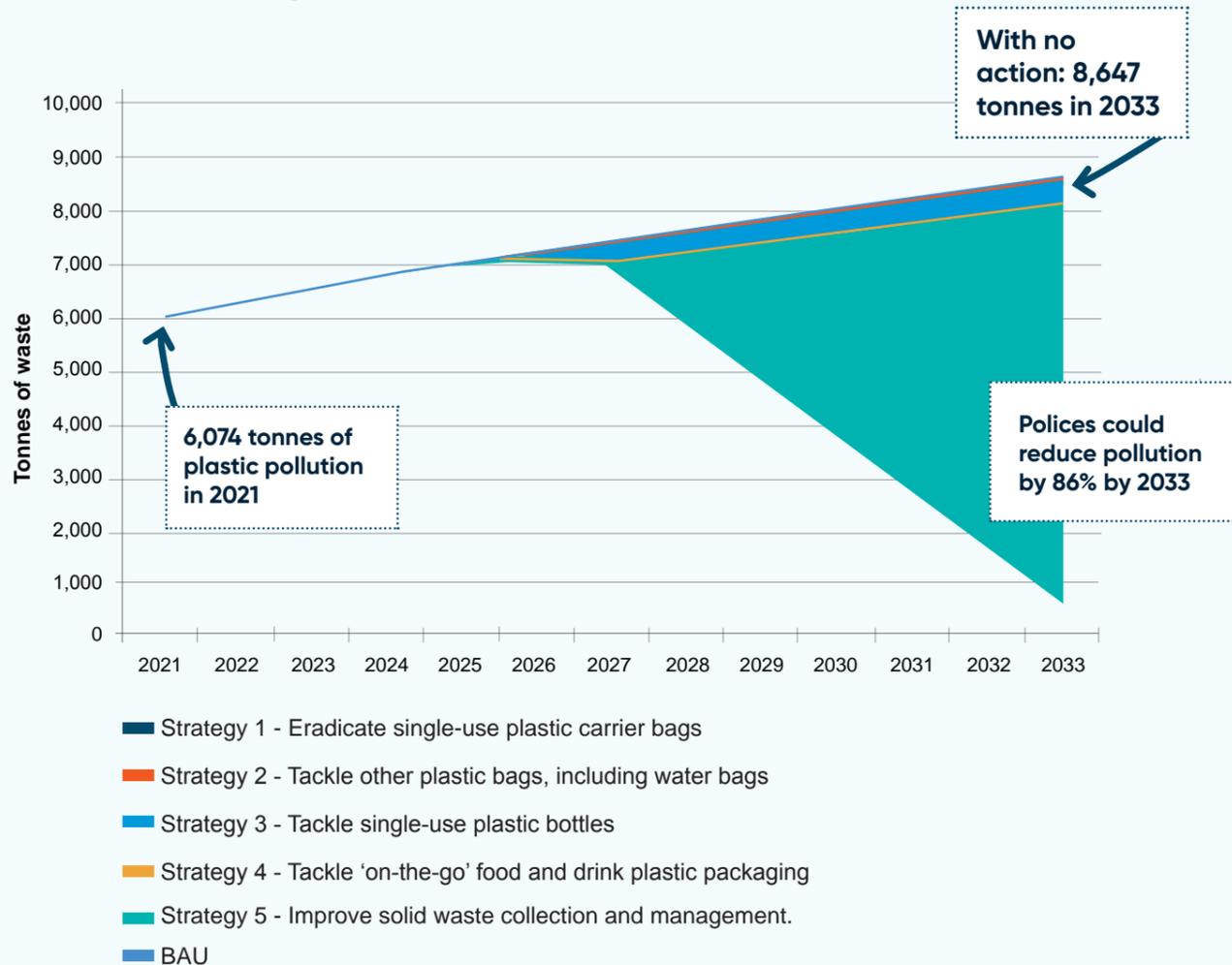


## Summary of the key strategies, policies, and their impact

The following five system-change strategies will help address the key sources of The Gambia's plastic pollution. Analysis using the Plastic Drawdown tool suggests that by 2033, these five strategies have the combined potential to reduce annual plastic pollution in The Gambia by 86%.

Plastic pollution in The Gambia comprises both macro and microplastics. This action plan focuses on macroplastic pollution, a key element of plastic pollution in The Gambia and the component that can be tackled with action today. Action to address microplastics will require careful consideration and international action over coming years.

### Impact of strategies to address marine plastic pollution



### Strategy 1 - Eradicate single-use plastic carrier bags

This strategy includes the following actions:

- **Policy 1.1:** Update of the existing plastic carrier bag ban, through education and engagement campaigns, and improved enforcement
- **Policy 1.2:** Develop a standard for reusable bags, plus launch a design competition for a 'reusable bag for The Gambia'

### Strategy 2 - Tackle other plastic bags, including water bags

This strategy includes the following actions:

- **Policy 2.1:** Ban on small single-use plastic bags
- **Policy 2.2:** Installing public water fountains
- **Policy 2.3:** Improving the supply and quality of potable water

### Strategy 3 - Tackle single-use plastic bottles

This strategy includes the following actions:

- **Policy 3.1:** Phased ban on single-use plastic bottles
- **Policy 3.2:** DRS for all other plastic bottles

### Strategy 4 - Tackle 'on-the-go' food and drink plastic packaging

This strategy includes the following actions:

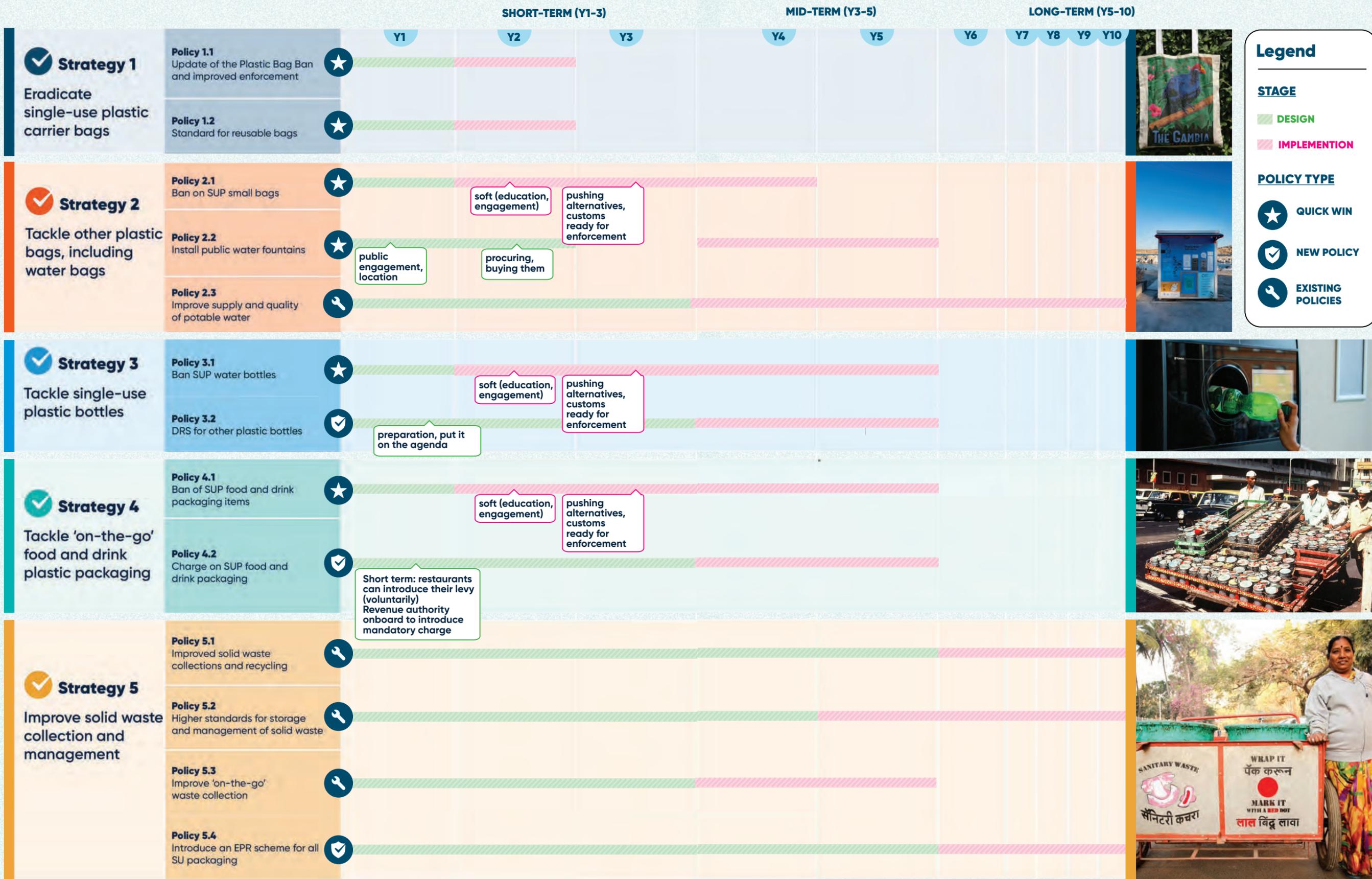
- **Policy 4.1:** Ban of selected SUP food and drink packaging items
- **Policy 4.2:** Introduce a charge on those SUP food and drink packaging items that are not banned

### Strategy 5 - Improve solid waste collection and management

This strategy includes the following actions:

- **Policy 5.1:** Improve solid waste collections and recycling
- **Policy 5.2:** Higher standards for storage and management of solid waste
- **Policy 5.3:** Improve 'on-the-go' waste collection (key supporting policy)
- **Policy 5.4:** Introduce an EPR scheme for all SU packaging

# The Roadmap



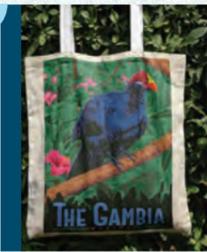
**Legend**

**STAGE**

- DESIGN
- IMPLEMENTATION

**POLICY TYPE**

- QUICK WIN
- NEW POLICY
- EXISTING POLICIES





## Introduction

### Plastic pollution is a global environmental and health problem – and it is getting worse.

Today, more than 300 million tonnes of plastic are produced annually – of which at least 14 million tonnes end up in our oceans. Right now, plastic makes up 80 percent of all marine debris found from surface waters to deep-sea sediments (IUCN, 2021).

By 2040, ocean plastic pollution is predicted to quadruple (Imperial College London, 2020), and is expected to account for 19 percent of the global carbon budget (UNEP 2023a).

The plastic problem is destroying our ocean and threatening the marine creatures and ecosystems that support a thriving blue economy. The cost of damage caused by marine plastic pollution in West Africa is estimated at between \$10,000 and \$ 33,000 per ton of plastic waste. (World Bank 2023).

As well as threatening livelihoods, plastic is a threat to our health – and now plastic particles have been discovered in nearly 80% of the human blood samples tested.

Despite this urgency, many countries still lack any policies targeted to address plastic pollution. An analysis in 2020 found that 14 of the world’s top 20 countries for plastic pollution have either no plastic policies at all, or their policies only address plastic bags (Karasik et al, 2020).

The need for governments to address plastic pollution is clearly laid out within their commitment to Sustainable Development Goals 14, 12, 11 and 3. In particular:

- **SDG target 14.1, to prevent and significantly reduce marine pollution of all kinds, particularly from land-based activities, including marine debris and nutrient pollution, by 2025; and**
- **SDG target 12.5, to substantially reduce waste generation through prevention, reduction, recycling, and reuse, by 2030 (Sustainable Development Goals, 2023).**

### National action against plastic pollution is urgently needed.

ECOWAS (Economic Community of West African States) and WAEMU (West African Economic and Monetary Union) have started collaborating to build a regional strategy for sustainable plastic waste management (World Bank, 2023).

In The Gambia, there is only one current policy focused on tackling plastic waste, the Ban on Plastic Bags Order, from 2015, with which The Gambia’s government banned the sale, import, and use of plastic bags in 2015 – and evidence suggests that this has had limited effect (UNEP, 2023b).

A more holistic and coordinated approach is needed to manage and reduce plastic consumption more comprehensively.

The country’s ambition is to develop a National Action Plan for plastics pollution that positions The Gambia as an exemplar developing state for plastics management.

Upstream international action, driven through an effective UN global treaty, will be instrumental in tackling the many cross-boundary challenges of plastics pollution. However, national governments can pave the way for a more resilient and healthy future by prioritising action against plastic pollution today, preparing for a legally binding treaty.



### Plastic stats

↑ **80%**

Plastic makes up 80 percent of all marine debris found from surface waters to deep-sea sediments.

↑ **19%**

By 2040, ocean plastic pollution is predicted to quadruple, and is expected to account for 19 percent of the global carbon budget.

↑ **80%**

Plastic particles have been discovered in nearly 80% of the human blood samples tested.

↑ **14 out of 20**

An analysis in 2020 found that 14 of the world’s top 20 countries for plastic pollution have limited plastic policies.



## Background

In 2022, the National Environment Agency entered into a partnership with Common Seas to design and deliver scalable solutions that tackle the source of the plastic problem.

This report sets out the results of analysis and consultation undertaken to understand the scale of The Gambia's plastic pollution problem and identify policies to tackle it through a National Action Plan. This will inform government policy to tackle plastics pollution over the next ten years.

Common Seas is proud to have worked in partnership with the government ministries and over twenty stakeholders to use the Plastic Drawdown tool in The Gambia (page 22).

The partnership has taken place under a Memorandum of Understanding (MoU) between Common Seas and the National Environment Agency.

Image: © iStock



### Country Profile: The Gambia

The Gambia is a country located on the western coast of Africa. It is the smallest, and one of the most densely populated countries in the continent - with 176 inhabitants per km<sup>2</sup> (World Bank, 2023c).

The country covers an area of 11,300 km<sup>2</sup> and has a population of around 2.5 million people (World Bank, 2023c). Of this, around 64% is estimated to form the urban population and around 36% the rural population (World Bank, 2022). The Greater Banjul Area (GBA) is the largest and most densely populated metropolitan area of the country and is home to 68% of the total population (African Development Bank, 2020). The country is bisected by the River Gambia, which runs through the country from its eastern border to the coast, where it falls into the Atlantic Ocean. Besides the 80 km Atlantic coastline, the country is entirely surrounded by Senegal (The Commonwealth, 2023).

The Gambia is a low-income country, designated by the United Nations (UN) as one of the 46 Least Developed Countries in the world. In 2020, the rate of the national poverty line was 53.4% (World Bank, 2023d).

Agriculture is the main economic sector, including fishing that accounts for 6.4% of the Gross Domestic Product (GDP) (International Trade Administration, 2022). According to the Food and Agriculture Organisation of the UN, Gambian's waters are among the richest fishing zones in the world (International Trade Administration, 2022). Tourism is also an important sector in The Gambia, accounting for 20% of the GDP (GIEP, 2023). The sector has suffered since the COVID-19 pandemic but has high potential for development.

**Effective waste minimisation and sustainable waste management is a critical issue to the country's economy and development.**

## Approach

### Stakeholders

The Government of The Gambia established a committee to oversee the creation and implementation of the National Action Plan. This comprised of representatives from the key ministries responsible for developing policy, as well as municipal government, the private sector and civil society groups.

A wider expert group of stakeholders was also consulted to further enable the robust, inclusive collection of country-specific data and information, and to understand potential stakeholder impacts from the policy options under consideration.

Consultation of these groups ensured the analysis is fully informed by the knowledge and expertise of those organisations and people most closely involved in the use and disposal of plastics in that country. Crucially, this means the National Action Plan is being co-created by those who will ultimately play a key role in its effective implementation.

The Plastic Drawdown Steering Committee consists of representatives from the following organisations:

- Office of the President, State House, Banjul
- National Environment Agency (the coordinating body)
- Ministry of Environment, Climate Change and Natural Resources
- Select committee on Environment – National Assembly
- Ministry of Health
- Ministry of Agriculture
- Ministry of Trade, Industry, Regional Integration, and Employment
- Ministry of Justice
- Ministry of Higher Education, Research Science and Technology
- National Disaster Management Agency
- The Gambia Ports Authority
- Department of Community Development
- The Gambia Police Force
- The Gambia Revenue Authority
- Food safety and Quality Authority
- Media Council
- Gambia Chamber of Commerce and Industry
- Banjul City Council
- Kanifing Municipal Council
- Mansakonko Area Council
- Kerewan Area Council
- Basse Area Council
- Janjangbureh Area Council
- Kuntaur Area Council
- Brikama Area Council
- Women Initiative Gambia
- Precious Plastic Gambia

In addition, the wider stakeholder organisations who contributed via their input into the workshop are listed below:

- Customs; and
- The Association of Non-Governmental Organisations in The Gambia (TANGO).

See the Acknowledgments for the full details of individual stakeholders involved.



Image: © State of Mic

### Approach to developing the National Action Plan

A baseline study brought together the best available information on plastic waste generation and management, to model waste flows (p35) and subsequently quantify the proportion of plastic waste that is captured by waste management infrastructure. The study also assessed the quantities of plastic pollution leaking into the terrestrial and marine environments. This included a review of country and region-specific literature sources related to plastic waste generation and leakage, to support understanding of the national plastic waste flow system.

Stakeholder consultation involved interviews with individuals and organisations from across the plastics value chain. This provided invaluable contextual insights and expert knowledge to complete data gaps and allow a holistic understanding of The Gambia's plastic waste system.

Policy analysis and visualisation drew on a global literature review of the effectiveness of different plastic policies, alongside stakeholder insights and a review of existing policies in The Gambia. The analysis explored the potential for 13 different policies to tackle the country's plastic problem (p15). This highlighted the instruments that could have the greatest potential impact on reducing plastic waste and pollution in The Gambia – taking into account the plastic waste composition and leakage characteristics identified in the baseline study.

Development of the National Action Plan included a stakeholder workshop and consultation. It drew on the committee and a wider group of expert stakeholders to build understanding of the different policies under consideration and enable the prioritisation of key strategies and actions for inclusion within the NAP.

This process included:

- Eliminating policies that were undeliverable for practical, economic or political reasons;
- Confirming a shortlist of policies with broad stakeholder support;
- Understanding which of these policies can be implemented in the short, medium or long term;
- Amending the design of each policy to fit the Gambian context;
- and Identifying the stakeholders that will be involved in the design and implementation of each policy.

## Plastic Drawdown tool

The analysis was underpinned by the Plastic Drawdown tool. Plastic Drawdown was developed by Common Seas in consultation with 24 governments including low to middle income countries and SIDS governments (2020).

Application of the tool by experts at Common Seas provided crucial data to:

- Describe the composition of The Gambia's plastic waste.
- Understand how much waste becomes plastic pollution.
- Explore how the problem will change over time.
- Analyse plastic-related policy.

Each of these points is expanded upon below.

### 1. ANALYSE PLASTIC-RELATED POLICY:

The tool analyses the total and yearly reductions in plastic pollution that could be achieved by 13 policies. This is used to visualise the combined reductions achievable by different policy strategies and the remaining plastic pollution after policy interventions. The Technical Annex details the data sources and assumptions used to develop a bespoke Plastic Drawdown model for The Gambia.

### 2. UNDERSTAND HOW MUCH WASTE BECOMES PLASTIC POLLUTION:

Plastic Drawdown delivers a material flow analysis that estimates the amount of plastic waste flowing into the ocean in The Gambia and what remains on land. It quantifies plastic waste that is recycled, incinerated, sent to landfill and exported.

### 3. EXPLORE HOW THE PROBLEM WILL CHANGE OVER TIME:

The tool forecasts a Business as Usual (BaU) scenario projected over the next ten years for waste generation and plastic pollution. This scenario assumes no further action is taken to address plastic pollution, and that current policy, infrastructure, and behaviours remain the same.

### 4. DESCRIBE THE COMPOSITION OF THE GAMBIA'S PLASTIC WASTE:

The tool quantifies the total plastic waste generated by imported products and categorises it into the 29 plastic item types that most commonly pollute the ocean. This includes single use plastics, sanitary items, fishing gear and construction plastics. It also estimates micro-plastic emissions from tyre-wear, brake-wear, clothing fibres, pellets and microbeads.



## Baseline assessment of plastic pollution

22.2 kilotonnes



22.2 thousand tonnes represents approximately 10% of total **municipal solid waste**, which amounted to an estimated 222.4 thousand tonnes (Jassey, Zaman & Syafrudin, 2021).

0.6 kilotonnes



0.6 thousand tonnes are waste from **microplastics and fishing gear**.

0.01 kilotonnes



Imports are small, with only 0.01 kilotonnes of plastic **waste imported** in 2021.

### Categories most generated as waste in 2021

- **419.3 tonnes** Beverage bottles, which includes any type or size of plastic bottle used to contain water and other consumable beverages;
- **385.7 tonnes** Construction plastics, including any items used for construction made from polyvinyl chloride (PVC) or polystyrene (PS) (e.g., pipes, sheets, fittings, etc.);
- **348.3 tonnes** Tyre wear, caused by the abrasion of vehicle tyres during use;
- **125.5 tonnes** Other plastic bags, which includes plastic bags used for purposes other than shopping (e.g., heavy duty bin bags, small bags for holding liquids for consumption etc.);
- **46.2 tonnes** On-the-go food and drink items, which includes single use plastic items commonly used to consume takeaway food and drinks (e.g., plastic cutlery, plastic and foam (EPS) cups, plates and takeaway containers, straws and stirrers etc.).

Image: © State of Mic

**22.8**  
kilotonnes of plastic waste  
produced in 2021  
equivalent to  
**0.025<sup>kg</sup>**  
per person per day

↑ **42%**  
expected in 2033  
(This is shown graphically  
in Figure 3).

Other plastic waste  
**=84%**  
of plastic waste generated

## Total waste generation

The Gambia produced an estimated 22.8 thousand tonnes of plastic waste (0.025 kg per capita per day) in 2021.

Of this total, 0.6 thousand tonnes are waste from microplastics and fishing gear. The remaining 22.2 thousand tonnes represents approximately 10% of total municipal solid waste, which amounted to an estimated 222.4 thousand tonnes (Jassey, Zaman & Syafrudin, 2021). Imports are very small, with only 0.01 kilotonnes of plastic waste imported in 2021.

The average per capita plastic waste generation in The Gambia is 0.025 kg per day, which is low. For example, this is less than one-third of the level in the European Union (0.09 kg per capita per day) (Eurostat, 2020). Waste generation rates are higher in urban areas than in rural areas, due to differing levels of disposable income and other socio-economic factors.

## Projection of future waste generation

There is only one current policy explicitly focused on tackling plastic waste – a **ban on plastic bags** – and evidence suggests that this has had a limited impact. In the absence of any new policy interventions to address plastic waste (i.e. the ‘business as usual’ scenario), the tonnage of plastic waste generated in The Gambia is estimated to increase by 42%, from 22.8 thousand tonnes in 2021 to 32.5 thousand tonnes in 2033. This is shown graphically in Figure 4.

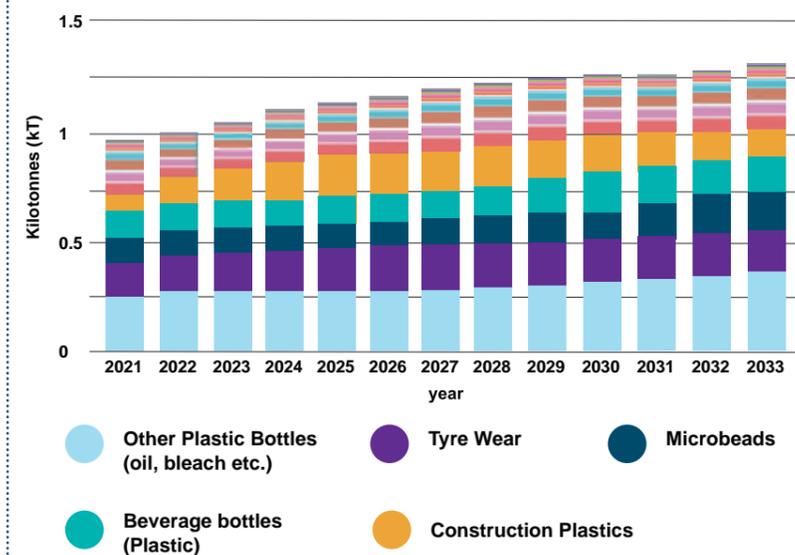
This increase is mainly due to two factors: (1) an estimated population growth rate of 2.9% year-on-year until 2032, based on historical population figures from the last 5 years (World Bank, 2022); and (2) projected growth of relevant product and packaging markets over the modelled timeframe from market research (Persistence Market Research, 2022).

The increase in plastic waste generation over time, and lack of clear, effective and robust policy or control mechanisms under the BaU scenario, leads to a significantly increased amount of plastic waste entering the sea by 2033 (see below for details). This shows the urgent need to bring in policy measures to reduce plastic pollution.

To provide further insights and support the development of policy, available data and information has been used to apportion as much as possible of the total tonnage of plastic waste into the 28 target item types that most commonly leak into the environment.

Image: © State of Mic

**Figure 3: Total plastic leaking into the aquatic environment**  
Note: this graph shows exclusion of ‘other plastics’.



**Figure 4: Managed vs mismanaged waste entering terrestrial and aquatic environments in 2021 and in 2033**

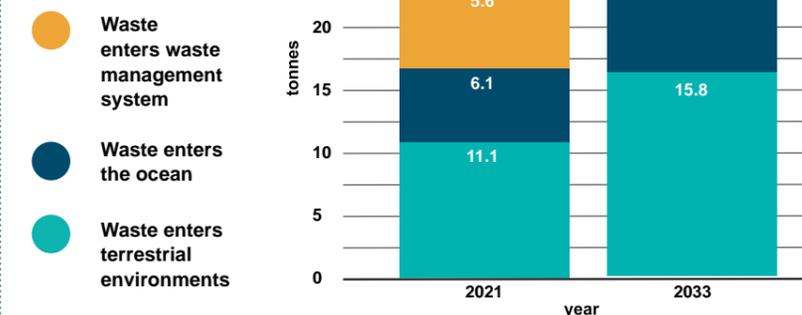


Figure 5 shows that when considering plastic waste generated by weight, the most significant plastic item is non-beverage plastic bottles (**976.3 tonnes**), which includes any plastic bottles used to contain liquids other than beverages (e.g., bleach, cleaning fluids, etc.).

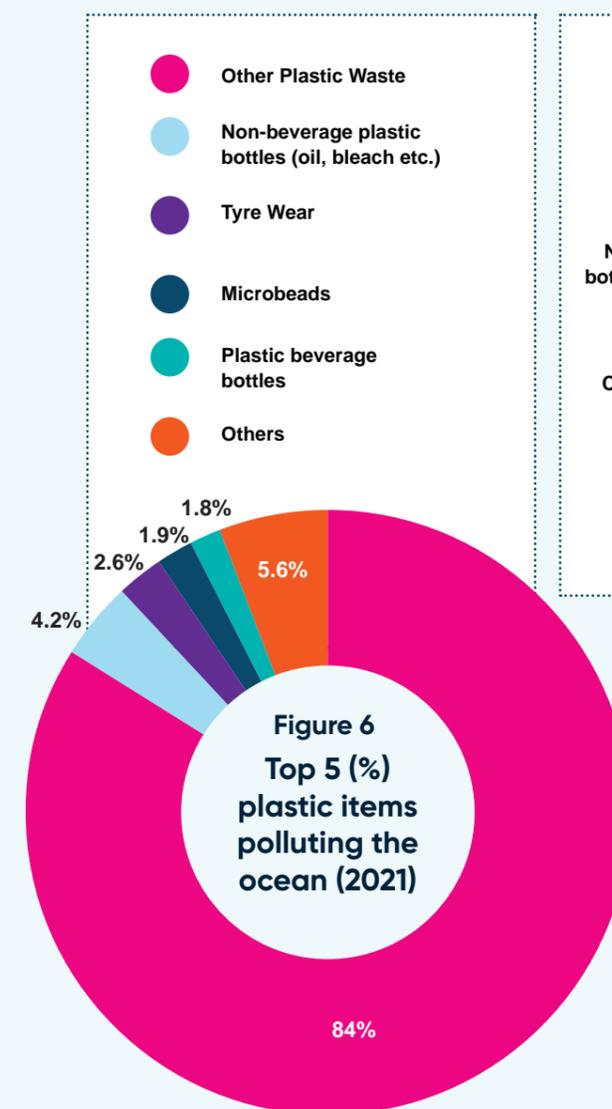
The next five item categories most generated as waste in 2021 within The Gambia were found to be:

- **419.3 tonnes** Beverage bottles, which includes any type or size of plastic bottle used to contain water and other consumable beverages;
- **384.7 tonnes** Construction plastics, including any items used for construction made from polyvinyl chloride (PVC) or polystyrene (PS) (e.g., pipes, sheets, fittings, etc.);
- **348.3 tonnes** Tyre wear, caused by the abrasion of vehicle tyres during use;
- **125.5 tonnes** Other plastic bags, which includes plastic bags used for purposes other than shopping (e.g., heavy duty bin bags, small bags for holding liquids for consumption etc.);
- **46.2 tonnes** On-the-go food and drink items, which includes single use plastic items commonly used to consume takeaway food and drinks (e.g., plastic cutlery, plastic and foam (EPS) cups, plates and takeaway containers, straws and stirrers etc.).

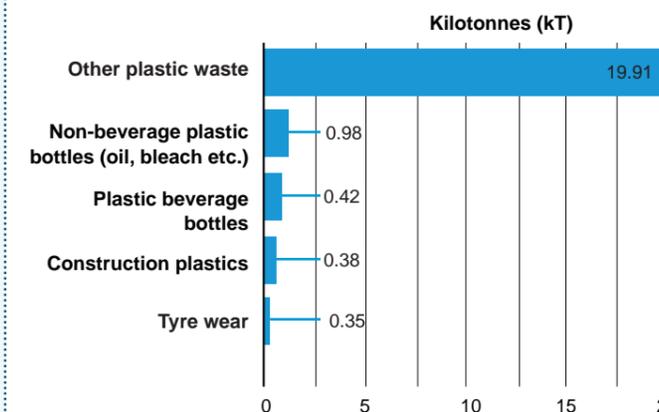
Whilst the items that are generated in greatest quantity in weight terms are important, there are other lightweight items that are also of policy interest, despite not being captured in the top five items by weight (Figure 7). These lightweight items (e.g., single use plastic sachets, small bags used to sell liquids etc.) pose a high risk to the environment as they are generated in high unit volumes. Their lightweight nature presents challenges for solid waste management, as they are more likely to leak into the environment due to wind and rain transport, have a higher risk of blocking drains and leading to flood events (which in turn can contribute to increased levels of plastic pollution), and are at higher risk of being littered (especially true for on-the-go food packaging items and similar).

**Figure 5**

Waste generated by plastic item	Tonnes in 2021
Non-beverage plastic bottles (oil, bleach, etc.)	976.3
Plastic Beverage Bottles	419.3
Construction Plastics	384.7
Tyre Wear	348.3
Other Plastic Bags	125.5
Microbeads	113.4
Plastic Grocery Bags	105.0
Pellets	60.0
Plastic Bottle Cap	48.8
Plastic Cups, Plates	47.2
Clothing Fibres	47.0
Plastic Take Out/Away Containers	31.5
Wet wipes	29.0
Plastic Lids	27.7
Food Wrappers (candy, chips, etc.)	19.9
Forks, Knives, Spoons	18.5
Sanitary pads	13.2
Cups, Plates (Foam)	12.9
Single serve sachets (non-food)	11.0
Take Out/Away Containers (Foam)	8.8
Straws, Stirrers	6.0
Balloons	4.4
Single serve sachets (food)	3.6
Diapers	2.0
Fishing Gear	1.3
Cigarette Butts	1.2
Condoms	0.8
Brake Wear	0.1
Other plastic waste	19,900
<b>Total</b>	<b>22,767</b>



**Figure 7: Top 5 items by weight (kT) 2021**



The remaining portion of total plastic waste, as illustrated in Figure 6, is the category 'other plastic waste' which comprises 19.9 thousand tonnes (84% of total plastic waste generated) in The Gambia. This includes industrial waste, business waste, and household waste items comprised wholly or partly of plastic, including for example; toys; plastic furniture; domestic appliances; textiles; and miscellaneous food packaging.

The level of available data in The Gambia has posed challenges in apportioning waste to our 28 target items. This means that the category of 'other plastic waste' is likely to include some target items that we have been unable to apportion due to data constraints.

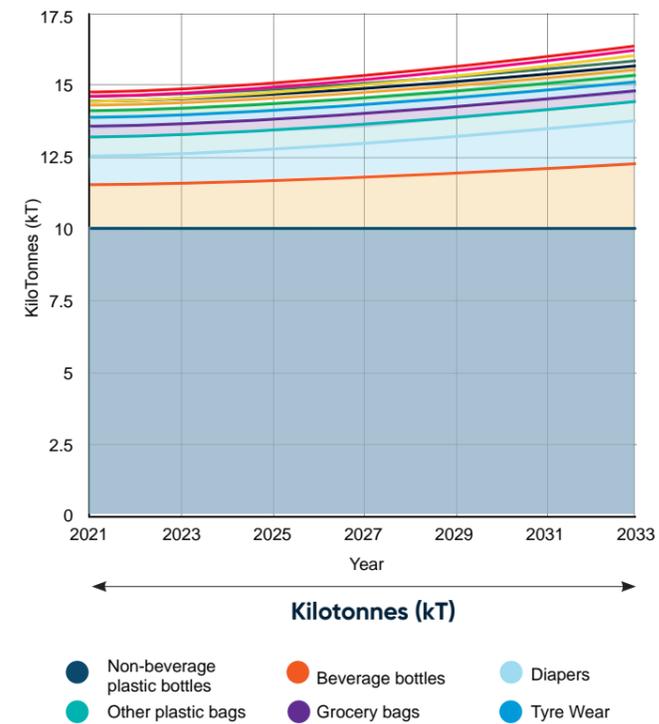
Even so, the analysis of these target items still provides key insights to support policy making in The Gambia, as discussed in the remainder of this section.

Non-beverage plastic bottles are still the most significantly generated item

**35.5**  
million units in 2021

Image: © WasteAid UK

**Figure 8: Growth in estimated plastic waste generation over time**

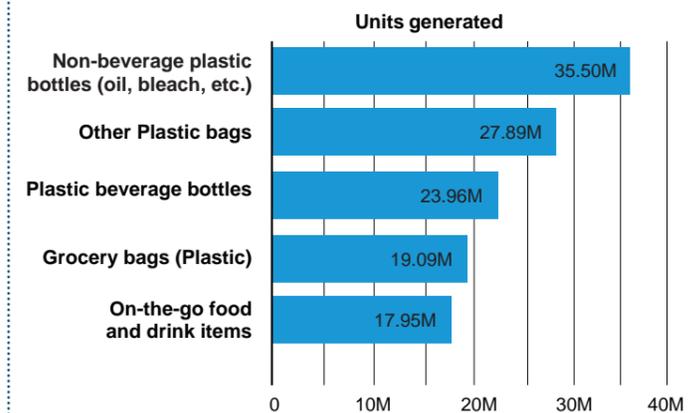


Stakeholder research in The Gambia revealed that small plastic bags used by local vendors to sell juices and other liquids are a highly prevalent item used and disposed of in The Gambia. Although light in weight, they are expected to be used in high unit volumes, especially in high footfall urbanised areas.

Analysis of plastic waste generated by unit volumes (as presented in Figure 9) shows that non-beverage plastic bottles are still the most significantly generated item (**35.5 million** units in 2021), followed by the below items:

- **27.9 million** Other plastic bags
- **24 million** Beverage bottles
- **19.1 million** Grocery bags
- **17.9 million** On-the-go food and drink items

**Figure 9: Top 5 items by quantity 2021**



Considering both weight (kT) and frequency (number of units) together results in the following seven top waste producing plastic item categories:

- Non-beverage plastic bottles;
- Beverage bottles;
- Other plastic bags;
- Construction plastics;
- Tyre wear;
- Grocery bags; and
- On-the-go food and drink items.

Image: WasteAid UK

## Plastic Flows: Summary

This section describes the flows – or pathways – that plastic waste in The Gambia takes on its journey, either to recycling or disposal ('managed waste'), or into the environment ('mismanaged waste').

### Managing the flow

The Plastic Drawdown analysis indicates that in 2021, 17.2 thousand tonnes leaked into the environment in The Gambia, shown in Figure 10 as 'mismanaged waste'. This equates to 6.9 kg per capita of plastic waste disposed of that subsequently leaks into the environment annually. To put this in context, this is equivalent in terms of weight to 395 beverage bottles, or 1,260 grocery bags, discarded per person, per year. Of this mismanaged plastic waste, approximately 35% subsequently leaks into aquatic environments whilst 65% is either burned in the open environment (contributing to poor air quality and climate change) or enters terrestrial environments (including informal unregulated dumpsites, used in the absence of Solid Waste Management, or through illegal dumping of wastes and littering).

Under a business-as-usual scenario, we estimate that plastic waste leakage into the environment will increase by 42%, to 24.4 thousand tonnes, by 2033. This is illustrated in Figure 10.

Plastic Drawdown uses a material flow-type approach to consider how plastic waste moves through the country, from the point of generation as waste to its potential release into the environment. This allows the plastic pollution problem to be illustrated as a flow diagram, with the flows of different types of plastic along each part assessed and quantified. The overarching flow diagram for The Gambia is shown in Figure 11.

The flow can be considered in terms of three interlinked parts:

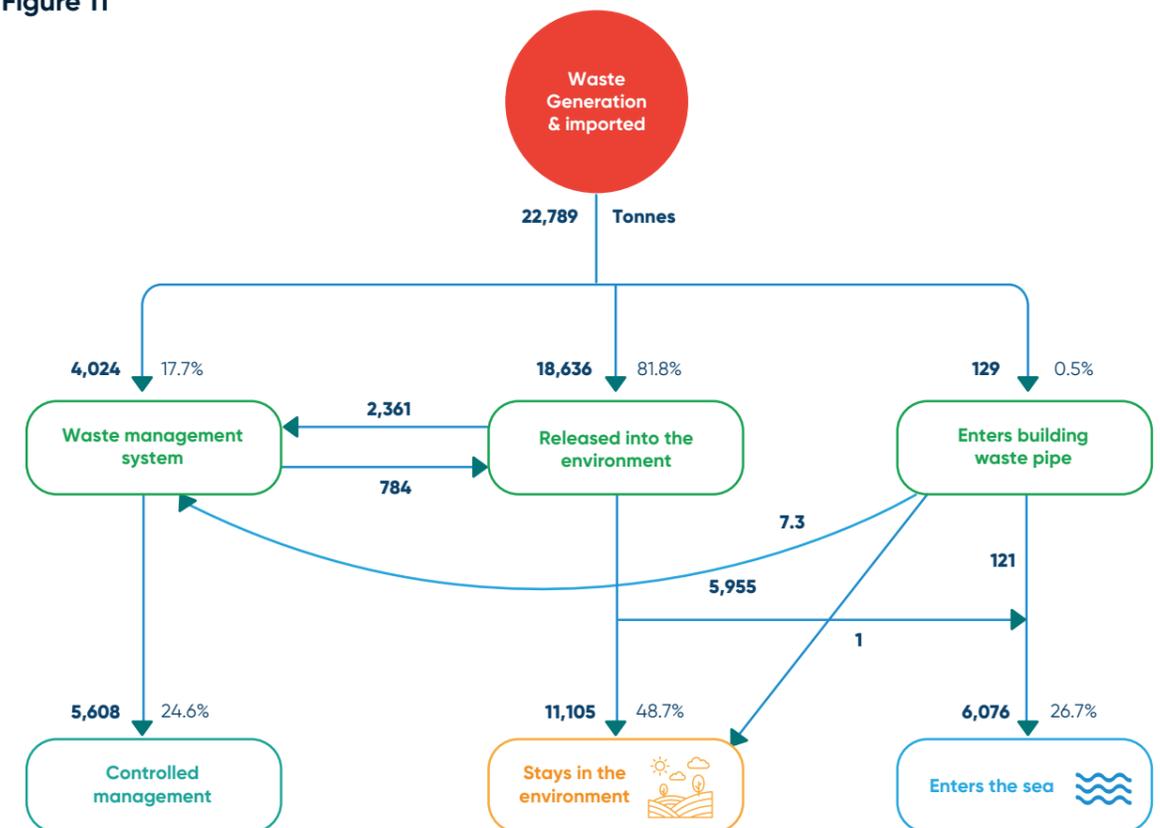
- 1. The release of plastics directly into the environment** (e.g. littering of plastic items in the environment).
- 2. Flows through the solid waste management system**, and potential leakages from this system (e.g. escape of plastic items from landfill).
- 3. Discharge of plastics into drainage and wastewater systems** (e.g. flushing of microplastic items or microplastics in wastewater).

**Figure 10: Managed vs mismanaged waste in 2021 and in 2033**



Image: © Unsplash

**Figure 11**



## Solid waste management in The Gambia

In urban areas (considering a combined assessment of the Kanifing, Brikama and Banjul areas), the formal waste collection rate is estimated to be an average of 24.5%. Collected waste is transported to formal dumpsites (Bakoteh, Bund Road and Tambana dumpsites), with no waste being formally exported to neighbouring countries or incinerated in controlled facilities. In rural areas, collection rates are significantly lower, at 5% on average, due to reasons such as a lack of municipal solid waste collection and management capability, challenging conditions such as poor road quality in rural regions (National Roads Authority, 2022), a lack of well-maintained collection vehicles and long distances from formal landfill sites. Whilst larger urban centres in up-country areas, such as Janjanbureh, have some limited level of formal waste collection, the extent of such operations appears to be small in comparison to waste collection in urban areas, due to the lack of formal dumpsites in these regions.

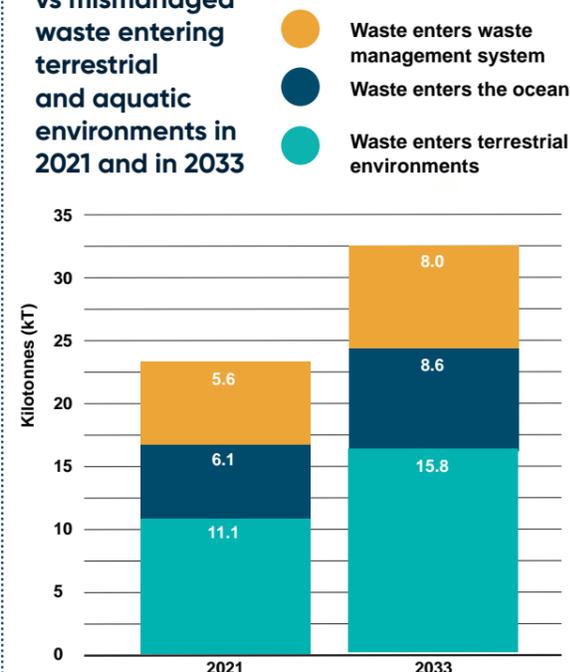
Whilst recycling operations are known to exist in some urban centres, supplied via informal collection from dumpsites, these operations are still relatively small scale and do not deal with any of the target items modelled within Plastic Drawdown. Stakeholder interviews revealed instead that several types of hard plastic products (e.g. crates, chairs etc.) are collected for recycling. These items are transported to small scale recycling facilities, such as those run by Plastic Recycling Gambia and M&M Plastic Manufacturing and shredded into flakes that are either bagged up and sold to plastic manufacturers within The Gambia or, in the case of M&M Plastic Manufacturing, made into pipes. Research and stakeholder interviews also suggest that recycled plastics are not currently exported to Senegal or other countries, but that some recycled plastic was exported to Senegal prior to the COVID-19 pandemic in 2020.

Image: © WasteAid UK

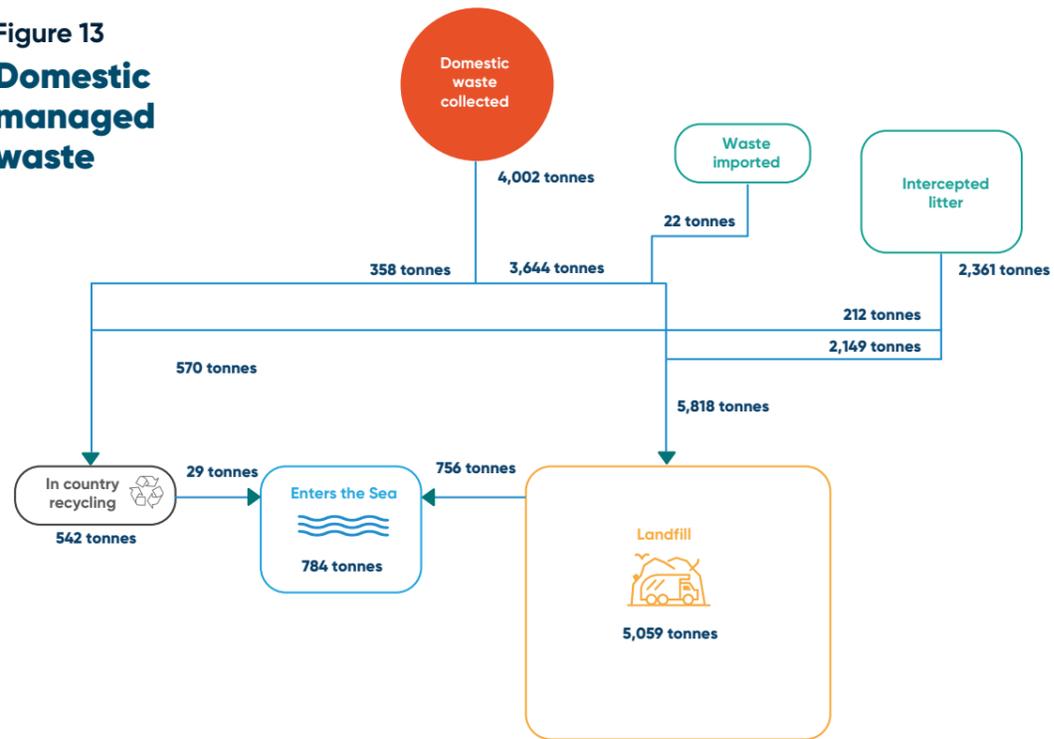
In the absence of reliable data on the volumes of plastic recycled in The Gambia, we have estimated that hard plastic recycling operations divert approximately 10% of 'other plastic waste' from landfill. Several Gambian recycling companies mentioned that PET bottle recycling was expected to begin in 2023, and that some companies were starting to procure the necessary equipment for these operations. For this reason, the quantity of 'beverage bottles' recycled in the baseline year was modelled as zero but was estimated to increase to 10% by 2033.

Best practices in solid waste management have been identified within the municipality of Kanifing, in the Greater Banjul Area (GBA). It collects around 500 tonnes of waste a day. In addition to its fleet of trucks, the municipality allows donkey-drawn carts to collect waste in areas inaccessible to trucks. The Bakoteh dumpsite, under Kanifing's jurisdiction, is the only fully fenced dumpsite in the country and the only one where a sanitary facility and an open shed have been built for the informal waste pickers.

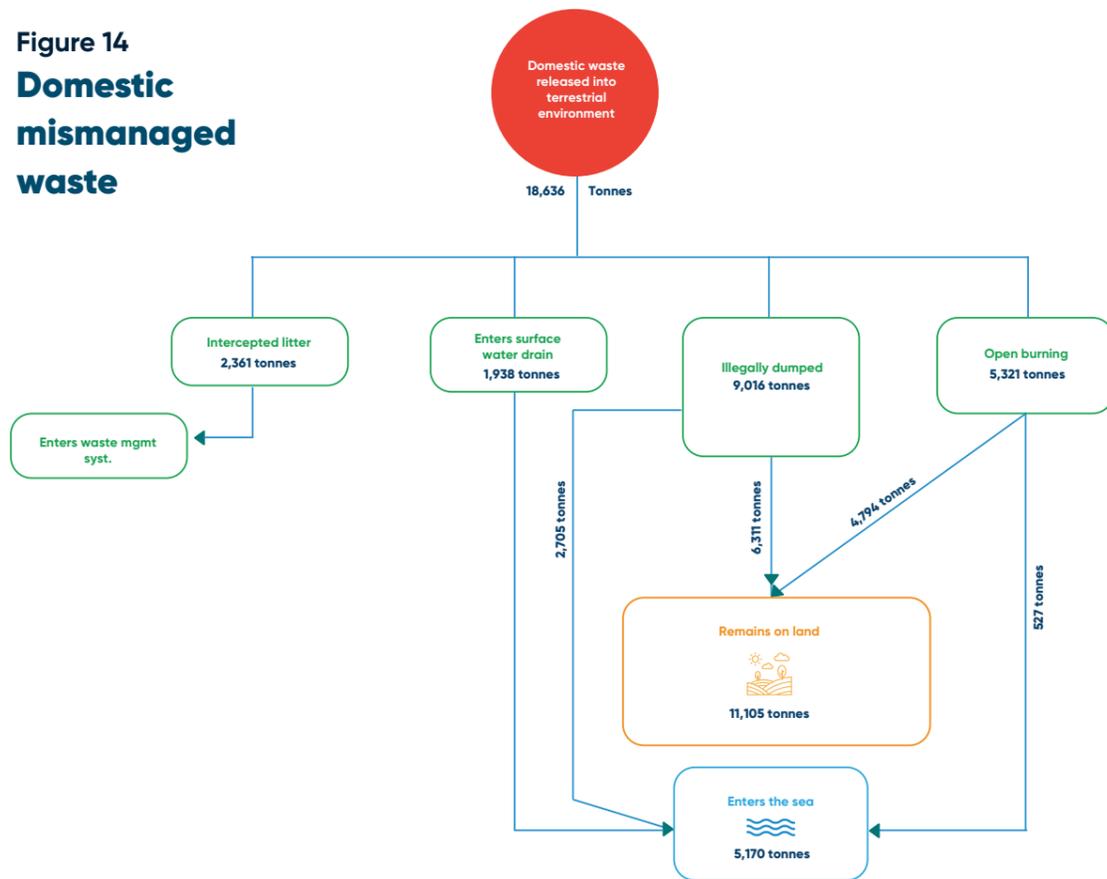
**Figure 12: Managed vs mismanaged waste entering terrestrial and aquatic environments in 2021 and in 2033**



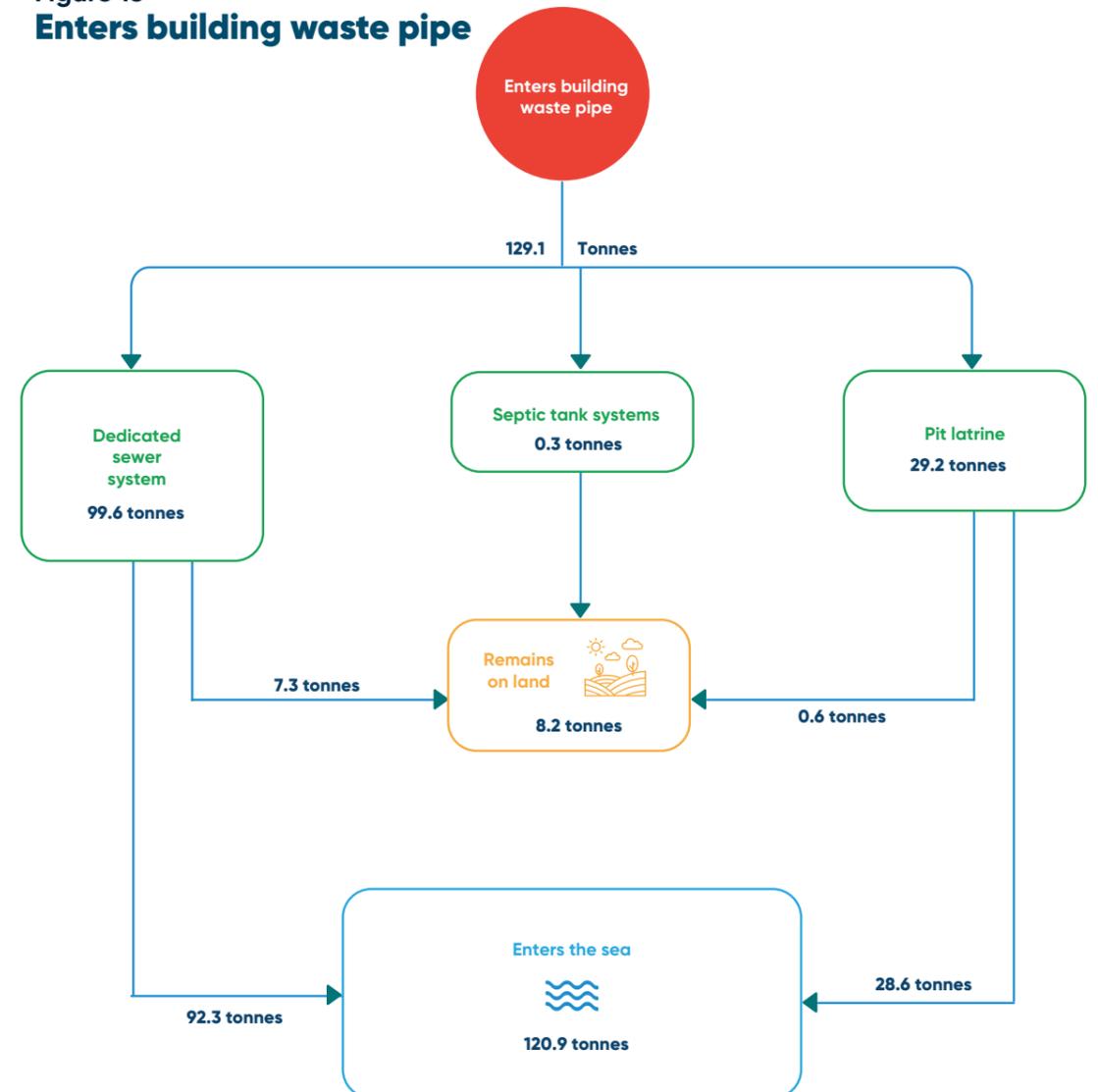
**Figure 13**  
**Domestic managed waste**



**Figure 14**  
**Domestic mismanaged waste**



**Figure 15**  
**Enters building waste pipe**



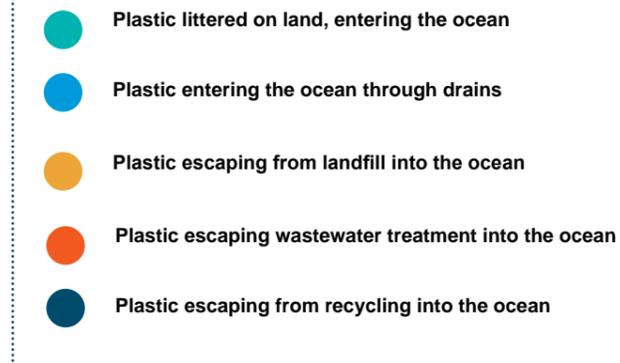
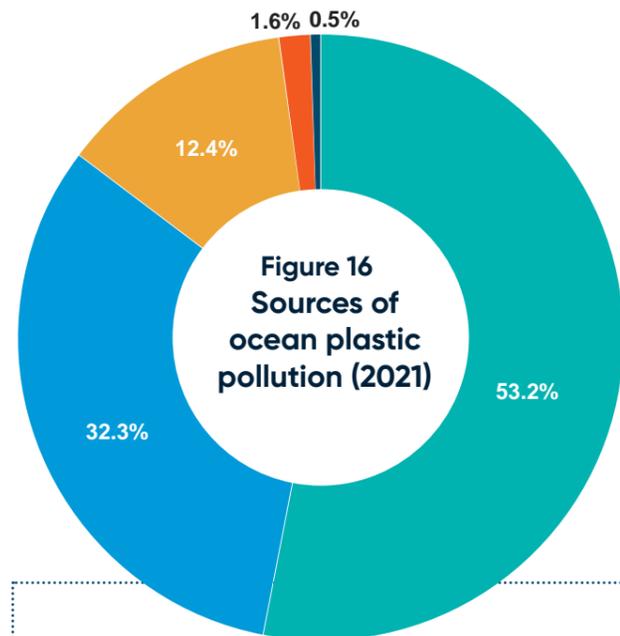
## This section discusses the estimated level and nature of plastic pollution leakage into the environment in The Gambia.

### How much plastic waste leaks into the environment?

The Plastic Drawdown analysis suggests that, as demonstrated in Figure 16, the largest pathway to ocean plastic pollution is plastic waste 'littered on land, entering the ocean' (53.2%). This category includes all waste that is directly or indirectly littered, or illegally dumped on land, which is subsequently transported to rivers and seas through flooding events, heavy rainfall, or being blown by the wind. This pathway also encompasses plastic pollution arising from high rates of littering of on-the-go items, especially within environments such as beaches or in areas close to coastal and riverine environments.

Our research suggests that, of the plastic waste littered on land and subsequently entering the ocean, open burning and illegal dumping are the most common methods for households to dispose of plastic waste. Approximately 44% of this plastic waste is open burned and 43% is illegally dumped, with the rest (13%) being buried; burial is less common, and only applicable to particular items (e.g. feminine hygiene products). Such disposal behaviours appear to be more common in rural and up-country areas, where access to solid waste collection and management is very limited.

The second largest pathway of plastic waste into the ocean (32.3%) is via drains, which most commonly expel waste directly into rivers, the ocean or into the wider environment. Sanitation systems connected to a piped sewerage system that flows into wastewater treatment facilities, are only understood to be available within the Tourism Development Area. In Banjul, research suggests that whilst 1.6% of sanitation systems are connected to a piped sewerage system, the wastewater ultimately drains out into nearby watercourses.



### What types of plastic leak into the environment?

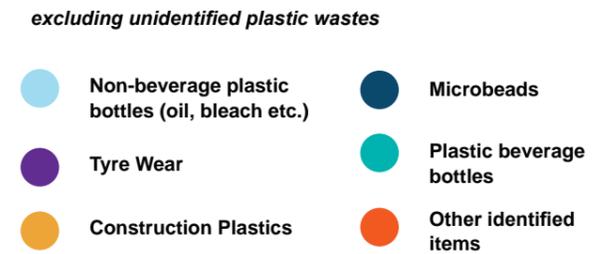
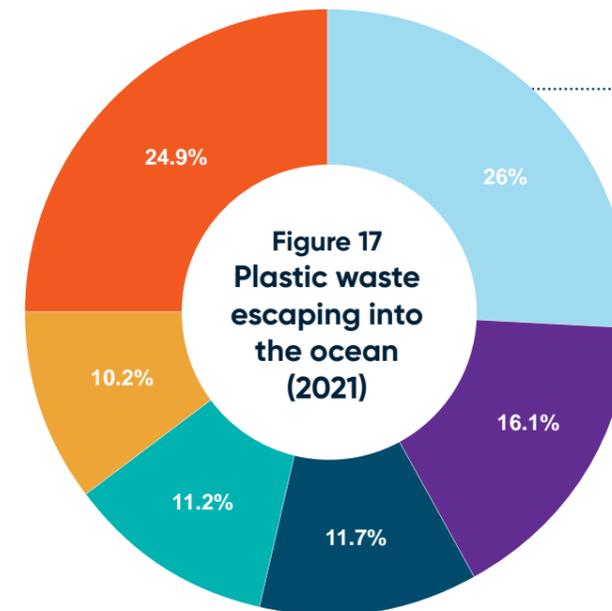
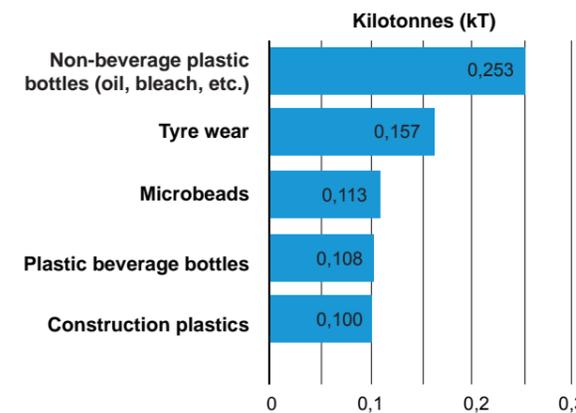


Figure 18: Top 5 items by weight (kT) 2021



In Banjul, research suggests that whilst 1.6% of sanitation systems are connected to a piped sewerage system, the wastewater ultimately drains out into nearby watercourses.

## What is the future projection for plastic leakage in The Gambia?

In the absence of policy interventions, we estimate that plastic waste leakage into the environment will increase by 42% by 2033. This would mean that a cumulative total of 95 thousand tonnes of plastic waste will enter Gambian rivers and the ocean over the 12-year period between 2021 and 2033.

The increase in plastic waste generation over time, linked to population growth, changes in consumption, and lack of clear, effective and robust policy or control mechanisms under the business as usual (BAU) scenario, leads to a significantly increased amount of plastic waste entering the sea by 2033. This demonstrates the urgent need to improve or bring in additional policy measures to reduce plastic pollution.

**95 kilotonnes**  
over the 12-year period between 2021 and 2033.

## Summary of Plastic Policies & Regulations

To date, The Gambia has introduced one specific policy measure to reduce plastic pollution. The Government published the Ban on Plastic Bags Order in 2015.

This ban followed four instruments already in place for the regulatory framework of municipal solid waste management in the country. The Gambia is also a signatory to two relevant international agreements: the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1989), and the Bamako Convention on the ban on the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa (1991).

- **The National Environment Management Act (1994)** provided the principles of environment protection and the instruments to carry out environment protection policies in The Gambia. Thus, the act provided for the creation of a Council for the protection of the environment with the President of the nation at its head and several ministers as members. The National Environment Agency was created under this act as a regulator and central coordination body that shall coordinate the environment policy of the government and be the secretariat of the Council.
- **The Local Government Act (2002)** established a decentralized local government system for The Gambia. In the act, the role of local government institutions in the management, protection and conservation of the environment is defined.
- **The Anti-littering Regulations (2007)** concerned the control of pollution caused by litter in public places or in any places visible from a public place. The Regulations empowered local authorities to undertake waste disposal operations.

- **The Waste Management Bill (2007)**, revised in 2016 was designed to complement the National Environment Act. It provides a specific legal framework for waste management including the licensing, collection, disposal and treatment of waste. This Bill has not yet been made an Act.

- **The Ban on Plastic Bags Order (2015)** made by the Chairman of the National Environment Management Council under section 63(1) of the National Environment Management Act. It prohibited the manufacture, importation, use or sale of plastic bags in The Gambia, although authorisation can be granted for exceptional use. The ban also imposed fines for breaches and mandated manufacturers to be responsible for the recovery and recycling of plastic bags. This took effect from the 1st of July 2015.

The enforcement of the law is coordinated by the National Environment Agency whose officers work with the security services. Unfortunately, weaknesses in the judicial system in the country can cause delays in the treatment of cases against plastic dealers who have been summoned to appear before the court. No data was available to indicate by what proportion plastic bag use has reduced since 2015, but our stakeholder research confirmed that plastic bags remain widely available in The Gambia.

## Summary of Initiatives & Projects

Below is a brief summary of stopped, ongoing and planned initiatives around plastic and solid waste management. When developing a National Action Plan, it is important to consider learnings from previous projects, as well as activities occurring under current and upcoming projects, to maximise efficiencies and ensure priorities are aligned with existing commitments.

### ✘ Stopped

- **Innovative Plastic Recyclers Gunjur** This organisation was created in 2019 with support from UK Aid and WasteAid. The aim of the project was to use plastic waste to support livelihoods, by turning thin plastics into paving tiles. The organisation was summoned by the National Environment Agency to stop its activities in 2022 as it burned plastics, releasing toxic emissions into the air.
- **Aniplast** Aniplast is a company in The Gambia that initiated some recycling activities. However, activities stopped in 2019 due to high utility charges associated with operating a range of specialized machinery necessary to recycle plastics. Aniplast reported that the costs of high-demand meters, understood to be four times greater than those for standard meters, were unaffordable.

Images: © Plastic Recycling Gambia

Images: © Plastic Recycling Gambia



### ✔ Planned

- **Precious Plastic Gambia** It is a joint project between Plastic Recycling Gambia, TARUD (Trust Agency for Rural Development), Growing Green Communities and the National Environment Agency. The aim is to form a thriving plastic recycling market in The Gambia with a collecting and processing target of 80 to 100 tonnes of plastics, per year, in the Greater Banjul Area. Their activities are expected to start in early 2024 with the production of tiles, bricks and bins as a first stage.
- **Greater Banjul Area Integrated Waste Management Project** is a project implemented by Tetra Tech International Development and Egis under the European Investment Bank (EIB)-funded Clean Oceans Project Identification and Preparation (COPIP) programme. COPIP aims to enable infrastructure that will reduce the amount of plastics entering the oceans along the coastlines of Sub-Saharan Africa. A pre-feasibility study was conducted in The Gambia in July 2023, and project implementation is expected to start in late 2025.

Images: © Plastic Recycling Gambia



### ⚙️ Ongoing

- **WasteAid and the Chartered Institution of Wastes Management (CIWM)** WasteAid UK began work in the Gambia in 2015. It is a non-profit organisation on a mission to tackle the global waste crisis. In 2022, it launched a Circular Economy Network project in the Greater Banjul Area, funded by the Chartered Institution of Wastes Management (CIWM). This project is now in its second phase and supports the transition to a circular economy by implementing circular waste and recycling initiatives mainly around plastics and organic wastes.
- **WasteAid and Plastic Recycling Gambia** In 2023, through funding from the Norwegian Retailers' Environment Fund, WasteAid UK has partnered with Plastic Recycling Gambia, a company established in 2017 for a two-year project. Three new hard plastics (e.g. chairs, gallons and crates) collection points have been created in the Greater Banjul Area (Tanjei, Brikama and Ebo Town). Each collection point will be managed by a registered organisation trained by WasteAid. Together, they plan to collect over 140 metric tonnes of plastic per year. Plastic Recycling Gambia has already established 21 collection points and collects an estimated 15 metric tonnes of hard plastic waste per month. The hard plastic is ground into flakes and sold to plastic manufacturers in and outside of the country. The company relies on private funds and has been looking for additional funding.
- **Kanifing Environmental Transformation Program (KETP)** This three-year program launched in 2022 and is funded by the European Union. It aims to support solid waste management in the municipality of Kanifing. In its framework, the council is building six solid waste transfer stations in six communities. The waste will be sorted at household level. At the transfer stations, individuals will be guided to put the different types of waste, including plastics, in the correct bins. Recyclers will then be able to collect the waste they need directly from those stations. This EU funding will also help Kanifing Municipality to accelerate the process of transforming the Bakoteh dumpsite into a waste transfer centre.

## Summary

The following five system change strategies can help address the key sources of The Gambia’s plastic pollution. Analysis using the Plastic Drawdown tool suggests that by 2033 these strategies have the combined potential to reduce annual plastic pollution in The Gambia by 86%.

### 1. Eradicate single-use plastic carrier bags.

This strategy will reinvigorate the existing ban on single-use plastic carrier bags by running education and engagement campaigns and increasing resourcing for enforcement of the existing ban. There needs to be a strong focus on developing a reusable alternative. This could be achieved by running a public competition to design a reusable shopping bag for The Gambia and developing common standards.

### 2. Tackle other plastic bags, including water bags.

Other plastic bags that are not used for shopping represent a key waste stream in The Gambia. These bags present a high risk to the environment as they are lightweight and generated in large numbers. This strategy tackles this waste stream through a combination of measures, including banning of small single-use bags; installation of public water fountains; and improving the supply and quality of potable water.

### 3. Tackle single-use plastic bottles.

Single-use plastic bottles are widely used in The Gambia and represent the most significantly generated plastic waste item by weight. This waste stream can be tackled through implementing a phased ban on single-use plastic bottles, and a deposit return scheme for all other plastic bottles that are not banned. These efforts aim to reduce the quantities of single-use plastic bottle waste generated, reduce littering, and improve management of this waste stream.

### 4. Tackle ‘on-the-go’ food and drink plastic packaging.

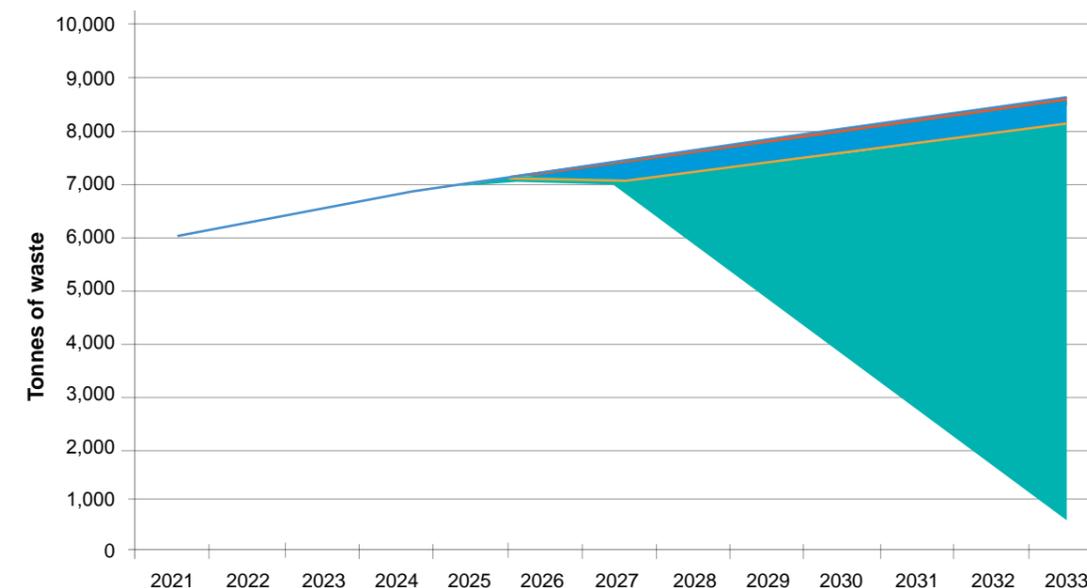
Other items consumed ‘on-the-go’, such as takeaway food containers, coffee cups, straws, lids, etcetera, are commonly littered on beaches and other public areas. With increasing trends in this takeaway culture, the following two policies are proposed to help the Gambian government tackle this waste stream; through banning selected single-use-plastic food and drink packaging items; and charging for other single-use-plastic food and drink packaging, where no suitable alternative exists.

### 5. Improve solid waste collection and management.

Finally, to manage the remaining waste that leaks into our sea and environment, a strong solid waste management system is required. This strategy will see improvements in waste collection and management, including; improving and extending the provision of household waste collections, as well as ‘on-the-go’ collections in high footfall areas; supporting waste segregation and recycling; the introduction of higher standards for the storage and management of waste; and introducing an Extended Producer Responsibility scheme for all single-use packaging.

The potential impact of these five strategies to tackle the plastic problem are explored below, combining 13 key policies and key enabling initiatives to support implementation and deliver widespread benefits in tackling plastic pollution. This co-design holistic set of policies will help to prevent plastic waste at source and improve plastic waste management in The Gambia.

Impact of strategies to address marine plastic pollution



- Strategy 1 - Eradicate single-use plastic carrier bags
- Strategy 2 - Tackle other plastic bags, including water bags
- Strategy 3 - Tackle single-use plastic bottles
- Strategy 4 - Tackle ‘on-the-go’ food and drink plastic packaging
- Strategy 5 - Improve solid waste collection and management.
- BAU

Several important enabling initiatives – such as focusing on education and youth action, behaviour change, inclusion of the informal sector, and regional cooperation – will also be critical to the success of the above strategies.

The baseline analysis indicates that tyre wear generates a significant portion of the total amount of plastic released into the environment in The Gambia by weight. However, addressing this through national policy could be difficult, as most tyres are manufactured abroad and imported into The Gambia. On this basis, tyre wear has been excluded from the policy discussion below.

## Strategy 1: Eradicate single-use plastic carrier bags

Although there is existing legislation which bans single-use plastic carrier bags, enforcement has been limited and plastic bags remain widely available in The Gambia.

These items present a high risk to the environment, as they are lightweight and generated in large numbers. This makes them likely to be littered and then leak into the environment, increasing the risk of blocked drains and local flooding events.

This strategy will reinvigorate the existing ban on single-use plastic carrier bags by:

- updating and reviewing it
- running education and engagement campaigns
- increasing resourcing for enforcement of the existing ban; and
- developing a standard for reusable bags, after running a public competition to design a 'reusable shopping bag for The Gambia'.

Governance responsibilities for this policy need to be clearly defined. It is proposed that responsibility should fall under the National Environment Agency with support from the Ministry of Environment, Climate Change and Natural Resources. Enforcement of the ban will be at customs, and at points of sale.

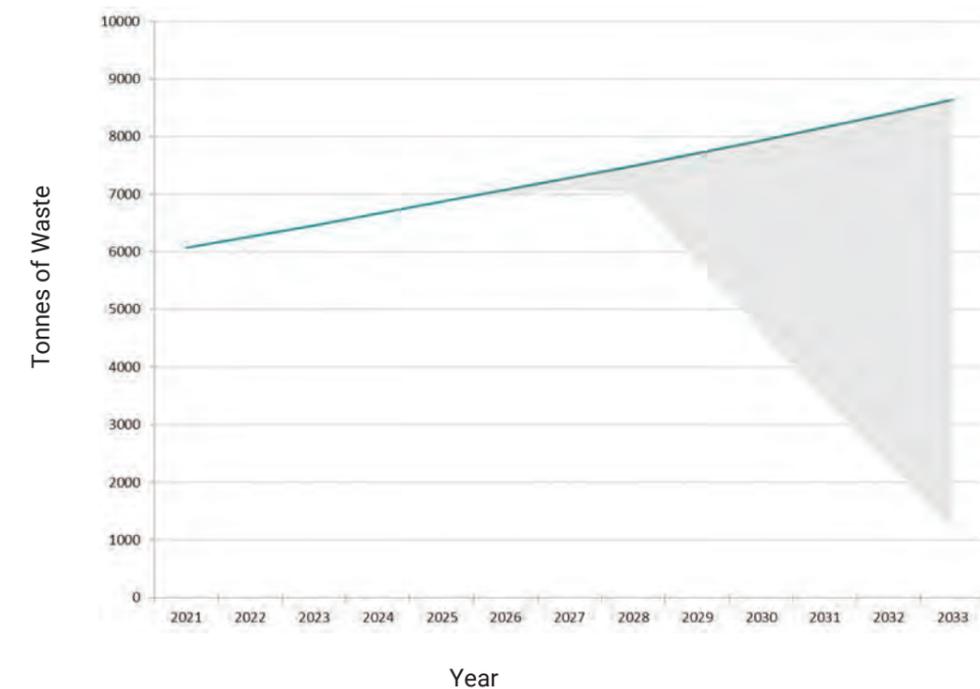


Image: © Unsplash

### Strategy 1: Policies

- BAU
- Policy 1.1: Update of the plastic carrier bag ban, education and engagement campaigns, and improved enforcement
- Policy 1.2: Develop a standard for reusable bags, plus launch a design competition for a 'reusable bag for The Gambia'

Figure 19: Shows the impacts of policies modelled within Strategy 1.



## Policy 1.1: Update of the existing plastic carrier bag ban, through education and engagement campaigns, and improved enforcement

### Key considerations

The Gambian Government published the Ban on Plastic Bags Order in 2015, banning the manufacture, import, sale or use of plastic bags throughout The Gambia, other than in specific exempted circumstances. Enforcement is coordinated by officers of the National Environment Agency working together with security institutions. Until now, enforcement of the ban has been limited. Plastic bags remain largely available in the country, with Polypropylene non-woven fabric bags (mostly imported from India) widely used as an alternative to previously used carrier bags. Those bags are also single-use plastic bags and are not a sustainable alternative. Those who break the law – business owners using and selling plastic bags – are summoned to appear before the court. However, shortcomings in the judicial system have led to delays in processing cases.

There is strong stakeholder support for reviewing and updating the existing ban, as well as relaunching it through a combination of new and creative education and engagement campaigns, and improvements in enforcement.

This policy should be closely integrated with the wider programme of communication and engagement activities. Linking these together with a launch on a global awareness day such as World Ocean Day, could provide an effective way to kick-start action on plastic pollution.

### Implementation

The exemptions to, and effectiveness of, the existing ban are due to be reviewed and updated in the near term, to ensure the ban is capturing the right items. This review could provide a useful opportunity to incorporate other problematic types of bags (e.g. supposedly 'biodegradable' bags, including oxo-biodegradable ones), in parallel with a re-announcement or reinvigoration of this 'flagship' policy. It will be important to ensure that suitable alternatives exist before expanding the ban, to avoid unintended consequences. Financial support may be useful to develop the emergence of sustainable alternatives, with the option, for instance, to support the local production of reusable bags.

To support implementation, education and engagement campaigns should be run, aimed at the general public and at businesses who still use plastic carrier bags, to explain why these items have been banned, and what alternatives are available (prioritising reusable bags – see Policy 1.2 below).

In the medium term, strengthening institutional capacities for the enforcement of the ban through training and increased resourcing will ensure consistent enforcement action against those continuing to ignore the ban, starting in those urban areas with the most bag litter. One approach might be to establish a mobile task force to enforce the ban. Enforcement activities will also need to include the work of customs officers, to combat crossborder smuggling of banned bags into The Gambia from Senegal.

## Case Study: Plastic bag ban in Antigua and Barbuda



### In 2017, Antigua and Barbuda implemented a ban on the importation, distribution, sale and use of single-use plastic shopping bags.

Within the first year, the ban contributed to a 15.1% decrease in the amount of plastic discarded in landfills in Antigua and Barbuda and has overall been regarded as relatively successful.

Strong leadership and careful, effective planning delivered a ban that achieved early stakeholder buy-in. This included building public awareness through social and televised campaigning, taking phased approaches with supermarkets and stores, introducing tax incentives for the importation of reusable bags, and significantly, financial support from China which allowed for capacity building and educational awareness.

For this bag ban, as well as the single use plastic product ban, Antigua and Barbuda had numerous key elements in place that contributed to their effectiveness.

Antigua and Barbuda had a **clear implementation plan** for the bans, and **consistent communication** about what was banned and when, leading to successful implementation and compliance. **Political drive and long-term commitment** were strong enabling factors for these policies. **A phased approach and a defined timeline** including a phase of adjustment for industry and the public was used, contributing to the success of these policies. **Early and regular stakeholder engagement** was critical to the success and effectiveness where stakeholders unanimously voted against importing plastics. Such early engagement meant there was widespread support for the ban before it came into effect. Furthermore, Antigua and Barbuda adopted an eight-step process which resulted in the ban being integrated into existing legislation. Specific stakeholders were targeted, including supermarkets to resolve outstanding issues. The bag ban came with a fine of \$1,110 USD or up to 6 months imprisonment. However, due to the positive support of the ban through awareness raising and stakeholder engagement, stringent enforcement was not required.

**15.1%**  
DECREASE IN  
THE AMOUNT  
OF PLASTIC  
DISCARDED IN  
LANDFILLS

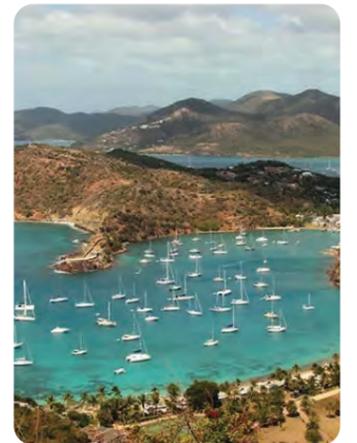


Image: © Unsplash

## Policy 1.2: Develop a standard for reusable bags, plus launch a design competition for a 'reusable bag for The Gambia'

### Key considerations

For the ban on single-use plastic carrier bags to be fully effective, citizens will need to be aware of the ban, the reasons behind it, have access to environmentally preferable alternatives, and be encouraged to use them.

In order to engage public interest, and to raise awareness of the problems caused by single-use plastic carrier bags and the benefits of switching to more sustainable alternatives, a competition could be launched, inviting citizens to design a 'reusable shopping bag for The Gambia'.

In parallel with the design competition, work should begin on developing a technical standard for reusable bags, to ensure that they deliver better environmental outcomes.

### Implementation

The design competition could perhaps be split by age into: (a) primary school children; (b) secondary school children; and (c) adults, with a small prize being awarded to the best entry in each age category. The competition could be promoted through schools, municipalities and via radio and television advertising and social media.

To develop a standard for reusable bags, and ensure they deliver better environmental outcomes, we recommend that a technical working group is established, and that this group initiates a study to develop a draft standard which addresses key issues, including:

- What definition of a reusable bag should The Gambia adopt?

For example, the definition might include:

1. A minimum number of times a bag can be reused, and/or a minimum lifetime that the bag should remain functional;
  2. Restrictions on the type and/or the thickness of the material that the bag is made from;
  3. A requirement that the bag be washable throughout its life;
  4. Or a requirement that the bag be recyclable at the end of its life.
- What types of reusable bags currently exist in The Gambia, and what measures may be needed to increase availability, particularly to disadvantaged groups?

Key features from the winning entries to the design competition should be incorporated into the reusable bag standard, which should then be promoted widely, both to consumers and to bag manufacturers. Ideally, the standard should be implemented through legislation, so that bags which do not meet the standard cannot be sold in The Gambia. Bags which do meet the standard could be marked with some sort of Quality Mark, to visually differentiate them from bags which do not meet the standard, both for consumers and for enforcement officials.



## Case Study: 'Fijian-Made' Campaign



In 2017, the government of Fiji launched a 'Fijian-Made' campaign to promote the use of local products manufactured in Fiji.

During the launch of a new plastic bag charge, Prime Minister Voreqe Bainimarama simultaneously launched a partnership with the Ministry of Women and the Ba Women's Forum, who manufactured alternatives to the newly charged single use bags. The Forum sold over 5,000 reusable shopping bags to a local supermarket, who agreed to promote the use of the local reusable shopping bags. These reusable bags are bright and colourful and are seen as an attractive alternative to single-use bags. Offering alternatives to consumers has proven to enhance successful implementation of SUP bag bans and charges. When endorsed by key government figures, it not only adds credibility but also provides additional assurance to consumers (FijiVillage.com, 2017).



Prime Minister Voreqe Bainimarama with women from Ba Women's Forum during the launch of the new ten cents charge on plastic bags.

Image: © Ba Women's Forum

## Strategy 2: Tackle other plastic bags, including water bags

Those plastic bags which are not used as shopping bags are a key waste stream in The Gambia.

They are the second largest specific item of plastic generated in The Gambia, accounting for 27.9 million units in 2021. Of particular interest are the small plastic bags which are often used to sell water, juices or other liquids such as cooking oil to consumers, particularly in the markets.

These bags present a high risk to the environment as they are lightweight, generated in large numbers, and often bought 'on-the-go' for immediate consumption of the liquid inside. This makes them likely to be littered and then leak into the environment, increasing the risk of blocked drains and local flooding events. In addition, SUP bags containing cooking oil present a health hazard when consumers melt the bag containing the oil into their food.

This strategy will tackle the environmental damage created by these bags through three policies:

- banning small single-use plastic bags;
- installing public water fountains; and
- improving the supply and quality of potable water.

Establishing governance responsibility for the policies under Strategy 2 will be crucial. It is proposed that responsibility for the ban on small SUP fall under the NEA with support from MECCNAR. The Gambia National Water and Electric Company (NAWEC) should be responsible for improving the supply and quality of potable water, and potentially also for installing public water fountains. The installation of public water fountains could also be done by local councils, or via an NGO.

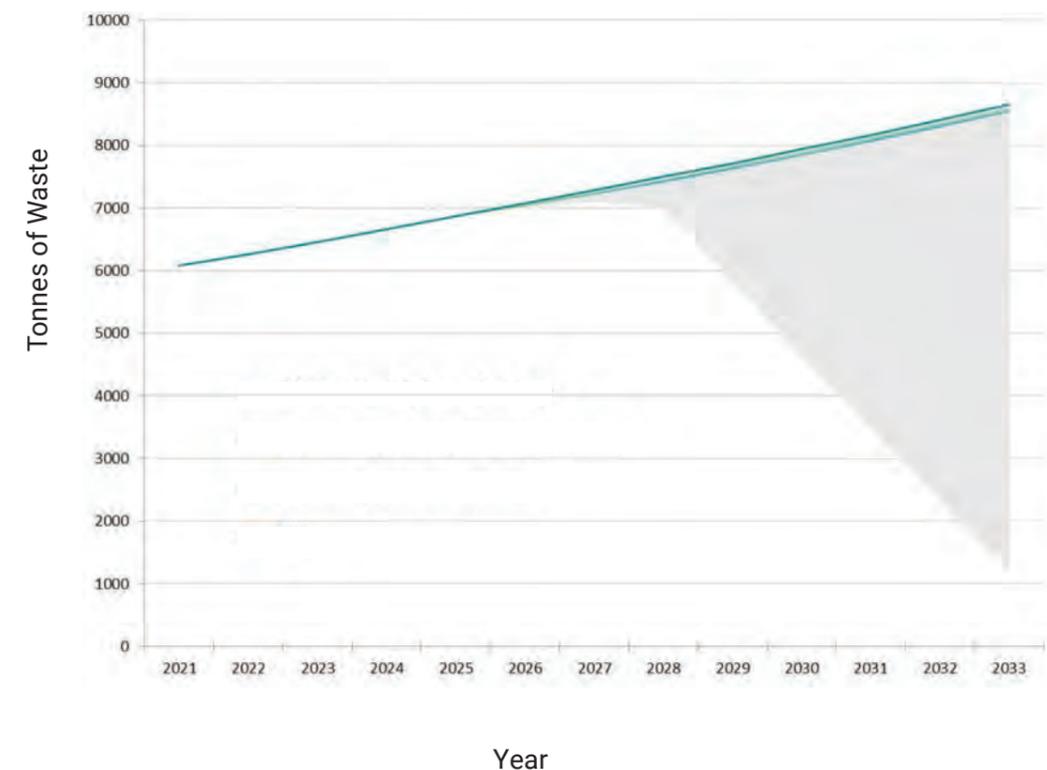


Image: © State of Mic

### Strategy 2: Policies

- BAU
- Policy 2.1: Ban on small single-use plastic bags
- Policy 2.2: Installing public water fountains
- Policy 2.3: Improving the supply and quality of potable water

Figure 20: Shows the impacts of policies modelled within Strategy 2.



## Policy 2.1: Ban on small single-use plastic bags

### Key considerations

We propose that a ban on small single-use plastic bags should be announced in the first year of the National Action Plan – but with a three-year lead-in period. The lead-in time would be used to:

- educate consumers and vendors on the problems these bags cause;
- identify and promote suitable alternatives (e.g. reusable 0.5 litre cups with fitted lids, perhaps under a DRS system); and
- work with market stallholders and others who currently use these bags, to promote their adoption of suitable alternatives.

Since 2015, when the Plastic Bag Ban Order was introduced in The Gambia, water bags/sachets, although still available, have mostly been replaced by water sold in single-use plastic cups sealed with a composite (aluminium-plastic) lid. These cups and lids are just as likely to be littered as bags, so this substitution will not reduce SUP pollution. Consequently, such SUP cups and lids can be included in the ban, to drive the adoption of more sustainable alternatives.

There is also the opportunity to reinvigorate refill systems that used to operate widely in The Gambia before SUPs became popular. For example, people used to take their own bottle along, and fill it up with ground nut oil from drums, buying the oil for a price based on the size of their bottle.



Image: © Unsplash

### Implementation

Any ban will need to be introduced sensitively, to avoid unintended consequences. This is because small SUP bags providing a low-cost way to package water and other liquids. Therefore, alternatives must be cost competitive over their lifetime.

The ban should follow a phased implementation plan, linked to the broader education and public engagement programme:

- Start with education and engagement activities focused on small single-use plastic bags (and unsuitable alternatives such as SUP cups and lids, or bags labelled as 'biodegradable', but which are unlikely to biodegrade in ambient conditions).
- Identify suitable alternatives, understand their current and future availability, and promote greater adoption through public awareness campaigns. Stakeholders (including market traders) should be fully involved in this process, to ensure that alternatives will be accessible and practical.
- Identify any additional support or mitigation measures that might be needed to avoid unintended consequences (e.g. any impacts on disadvantaged communities, including low-income consumers, informal waste collectors, and market traders).
- The ban should also be phased in geographically, with the early priority being high footfall urban areas in general, and transport hubs and markets in particular.

Develop the necessary enforcement capacity, ensuring that appropriate resources are available to police the ban in a proportionate but consistent way (this capacity building will be linked to that under Strategy 1, which also seeks to increase enforcement capacity). As a first step, it will be important to build enforcement capacity and organise training for enforcement officers. Cross-border enforcement between The Gambia and Senegal will also be important, to avoid banned bags being smuggled into The Gambia.

Improved 'on-the-go' waste collection can also be introduced to tackle littering of these single use items during the transition to more sustainable alternatives.

There is an important link with Strategy 3 (see below), which focuses on a ban on certain beverage bottles. It will be important to implement these two sets of policies in an integrated way, to avoid any unintended consequences, such as encouraging a substitution from SUP bags to SUP cups or SUP bottles.

## Policy 2.2: Installing public water fountains

### Key considerations

One way to provide citizens with an alternative to buying water in small single-use plastic bags is through the provision of water fountains in public places, which members of the public can use to refill their reusable water bottles.

The water vending system operating in Senegal was highlighted as a potential example that could be considered for deployment in The Gambia.

### Implementation

The installation of a network of public water fountains in urban areas, including in schools, parks, administrative buildings, public transportation hubs, tourist areas and beaches, where users can access free or low-cost filtered potable water, is recommended.

The public, including relevant NGOs, should be consulted on the detailed design of this policy, in order to ensure that the water fountains will meet their needs.

The public should then be encouraged to carry refillable water bottles with them and fill up 'on-the-go', rather than buying water in small plastic bags or cups.

This should be supported through a public education and engagement campaign, explaining the environmental damage caused by single-use plastic bags and cups, and the benefits of using the water fountains with a reusable bottle instead.

Regular maintenance of water fountains is important, to ensure cleanliness and uninterrupted operation. This needs to be included in the implementation plan.

## Policy 2.3: Improving the supply and quality of potable water

### Key considerations

In the longer term, the best way to eliminate the need for citizens to buy water in small SUP bags is by improving the supply and quality of potable water available in public and private spaces.

One reason why citizens buy fresh water in small bags or cups is because potable water is not readily available, or where the available potable water is perceived to be of low quality. See also strategy 3 below.

### Implementation

In the short term, we recommend the installation of water filters in households, offices and other businesses, to improve water quality and taste. Public confidence in the quality of tap water can also be improved through regular testing, with the results being published. This should be accompanied by a public engagement campaign, explaining the environmental, health and monetary benefits of drinking filtered tap water.

In the longer term, increased investment will be needed in the public water supply infrastructure, to improve coverage and quality.

## Case Study: Water refill campaign



### On the Greek island of Paros, Common Seas has worked with the local water company, DEYAP, to encourage more people to drink tap water.

Activities have included:

- Rebranding water refill machines to promote their use;
- An island-wide communications campaign, targeted at locals, tourists, and the hospitality sector, to explain the benefits of switching to tap water;
- A guide to water filters for locals who prefer to drink filtered tap water.

The project engaged 270,000 people and led to a drop of two-thirds in the number of residents who believed that the tap water on Paros was not safe to drink (Common Seas, 2021).

In the Maldives, analysis by Common Seas showed that over half of identifiable plastic pollution was single use plastic water bottles. As part of the government's National Phase Out Plan to address this issue, the Ministry of Youth, Sports and Community Empowerment coordinated with Common Seas and the NGO "Zero Waste Maldives" to install water refill stations, targeting areas of high consumption like the sporting complex in the capital of Male and promoting behaviour change through public communications. Each water station is metered to allow the use and number of avoided plastic bottles to be calculated (Common Seas, 2023).



Image: © Common Seas

## Strategy 3: Tackle single-use plastic bottles

In The Gambia, the demand for bottled water has been steadily increasing due to concerns about the safety of tap water.

In addition, water distribution by the National Water and Electricity Company (NAWEC) is not constant. Soft drinks and bottled juices are also very popular in the country. A new Gambian-owned soft-drinks bottling company has recently been launched, producing its drinks in SUP bottles and cans. Some alcoholic beverages are also available in plastic bottles.

Although water bottles are sometimes reused, mostly by local juice sellers, there is no organised collection system or a recycling scheme for the single-use plastic bottles. They are one of the most significantly generated plastic waste items by weight in The Gambia. The tourist areas along the Atlantic Ocean and the River Gambia are also recreational areas for the locals and can get crowded, particularly on Sundays and during the school holidays. The lack of waste bins leads to single-use plastic bottles for water and other beverages littering the environment and leaking into the ocean and the river. Measures are needed to reduce this waste stream, particularly in the tourist areas.

This strategy will tackle the pollution caused by SUP beverage bottles through two policies:

- a ban on single-use plastic bottles; and
- a DRS for all the other plastic bottles that have not been banned.

It is proposed that the ban on single-use bottles be the responsibility of the NEA, with support from MECCNAR. For the DRS, there are several ways this can be structured but the most common model is for the scheme to be coordinated by an independent, non-profit organisation with representation on its board from government, industry and other key stakeholders.

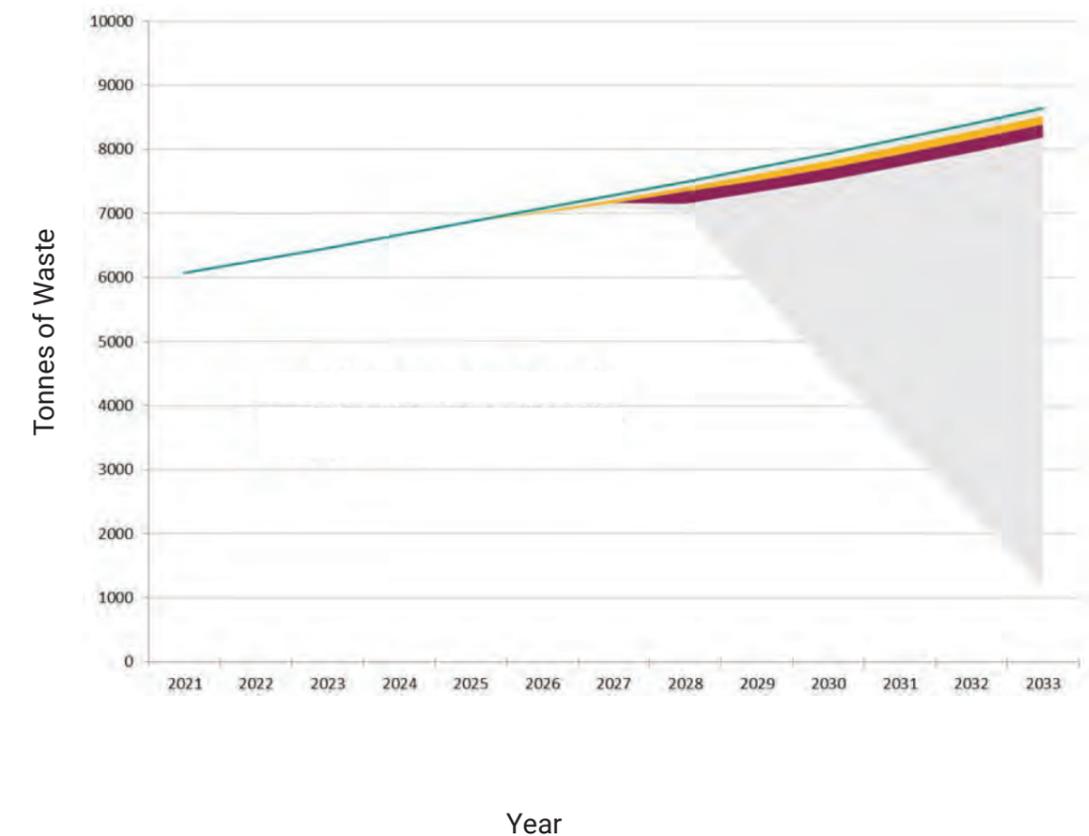


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### Strategy 3: Policies

- BAU
- Policy 3.1: Phased ban on single-use plastic bottles
- Policy 3.2: DRS for all other plastic bottles

Figure 21: Shows the impacts of policies modelled within Strategy 3.



## Policy 3.1: Phased ban on single-use plastic beverage bottles

### Key considerations

Our modelling suggests that a ban of SUP water and other beverage bottles could reduce ocean leakage by 0.73 kilotonnes by 2033 - the single largest reduction for any single policy and item. It is therefore identified as one of the policies to take forward as part of a wider strategy to reduce reliance on SUP bottles. The idea is to progressively ban the sale and use of SUP water bottles up to 2 litres in size (and up to 3 litres on or around beaches and adjacent tourist areas) and non-water SUP beverage bottles up to 1 litre. It may be challenging to ban SUP water bottles outright, given the water quality issues in The Gambia. However, it should be possible to start with the smallest packaging format (e.g. plastic water bottles under 500ml). The intention is to encourage consumers to buy water or other beverages in larger bottles and then decant these into smaller reusable bottles as needed, thus cutting down on the number of SUP bottles used in The Gambia. The new Gambian soft drinks bottling company is already producing its products either in SUP bottles or cans. Following the ban, the company could shift to producing drinks in cans or in large format SUP bottles only. Cans are less problematic, as they are already being informally collected and recycled into cooking pots in the country.

It is important to note that the informal sector collects and resells SUP water bottles for reuse and recycling. It is essential that informal waste workers, key actors diverting plastic recyclables from landfill or the wider environment, are involved in the design of the legislation, and that measures to consider their role in reuse and recycling are taken, to avoid the new legislation affecting them negatively.



Image: © Unsplash

### Implementation

Further research into the single-use plastic bottle market will help to define the scope and phases of this ban. Proposed phases would see PET bottles below 500ml included in the initial ban, followed by a demonstration project for larger format bottles. Stakeholder consultation should ensure that businesses receive early notice of the proposals and have an opportunity to feed into these (e.g. on the timing of the ban). The local hospitality and tourism businesses will have to be incentivized to act (e.g. by providing their customers with water fountains, glasses and glass carafes) and to encourage their consumers to refill their own refillable bottles as needed. The incentives could be part of the promotion of best practices of The Gambia Responsible Tourism Policy. Banning single use plastic bottles is an ambitious policy, particularly given their widespread usage. However, it has been implemented in similar contexts where SUP bottle usage was high, but litter from these items caused significant impacts on the environment and thus the tourism industry in countries that depend upon it (e.g. Maldives).

Enforcement will be the biggest challenge for a ban on SUP bottles. A public education and awareness campaign can encourage compliance, in parallel with a penalty mechanism for those not adhering to the ban. A stringent fine for those littering the banned products in tourist areas, or into the river or ocean, alongside a stringent fine for any local hospitality and tourism businesses who continue to sell those products despite the ban, should be introduced and effectively enforced, particularly during the early months of the ban.

Training for customs officials will need to be rolled out, as well as training officials working at point-of-sale. It is important that the timing of this policy is coordinated to happen alongside other policy instruments which encourage and support the use of alternatives (e.g. through the improved supply and quality of potable water, installation of water refill points, and the introduction of a DRS for those plastic bottles that are not banned), to help consumers adapt to the ban and respond to the changes in a positive way.

Once the ban has been put in place for smaller format bottles, a pilot could investigate the feasibility for larger format bottles, e.g. particularly alongside expanding refill provision.

## Case Study: Ban on SUP bottles in the Maldives



Single-use plastic bottles are a common waste stream in developed and developing countries alike – representing a common consumer product that is easily littered.

Whilst efforts have been made to ban single-use plastic bottles in controlled environments such as national parks and other protected areas, there are not many nationwide bans of single-use plastic bottles.

Nonetheless, the Maldives has made headlines as being one of the first countries to implement a nationwide ban on plastic water bottles. This announcement follows analysis that Common Seas provided the Maldivian Government which showed that over half of identifiable plastic pollution was single use plastic water bottles. A suite of policy recommendations was set forth and incorporated into the government's National Phase Out Plan to address this issue, emphasizing the country's commitment to preserving the pristine beauty of its islands.

While the Maldives has successfully banned various single-use plastic products in recent years, the focus is now on plastic water bottles that are smaller than one-litre, commonly used in gatherings and events. The ban, effective from December 2023, with a complete retail ban by March 2024, aligns with the Environment Protection and Preservation Act, emphasizing the government's meticulous approach to addressing plastic pollution.

Despite potential challenges, such as the popularity of small water bottles for school and organisational activities, the move aims to encourage citizens to adopt a more sustainable lifestyle in the face of climate change threats. The Maldives' commitment to these bans and promotion of alternatives serves as an inspiring example globally, urging citizens and businesses to actively participate in preserving the natural beauty that defines the Maldivian landscape (Maldives Financial Review, 2023).



Image: © Common Seas

A spokesperson for the President of the Maldives announcing its National Phase Out Strategy at the 74th session of the United Nation's General Assembly (UNGA) in 2019.

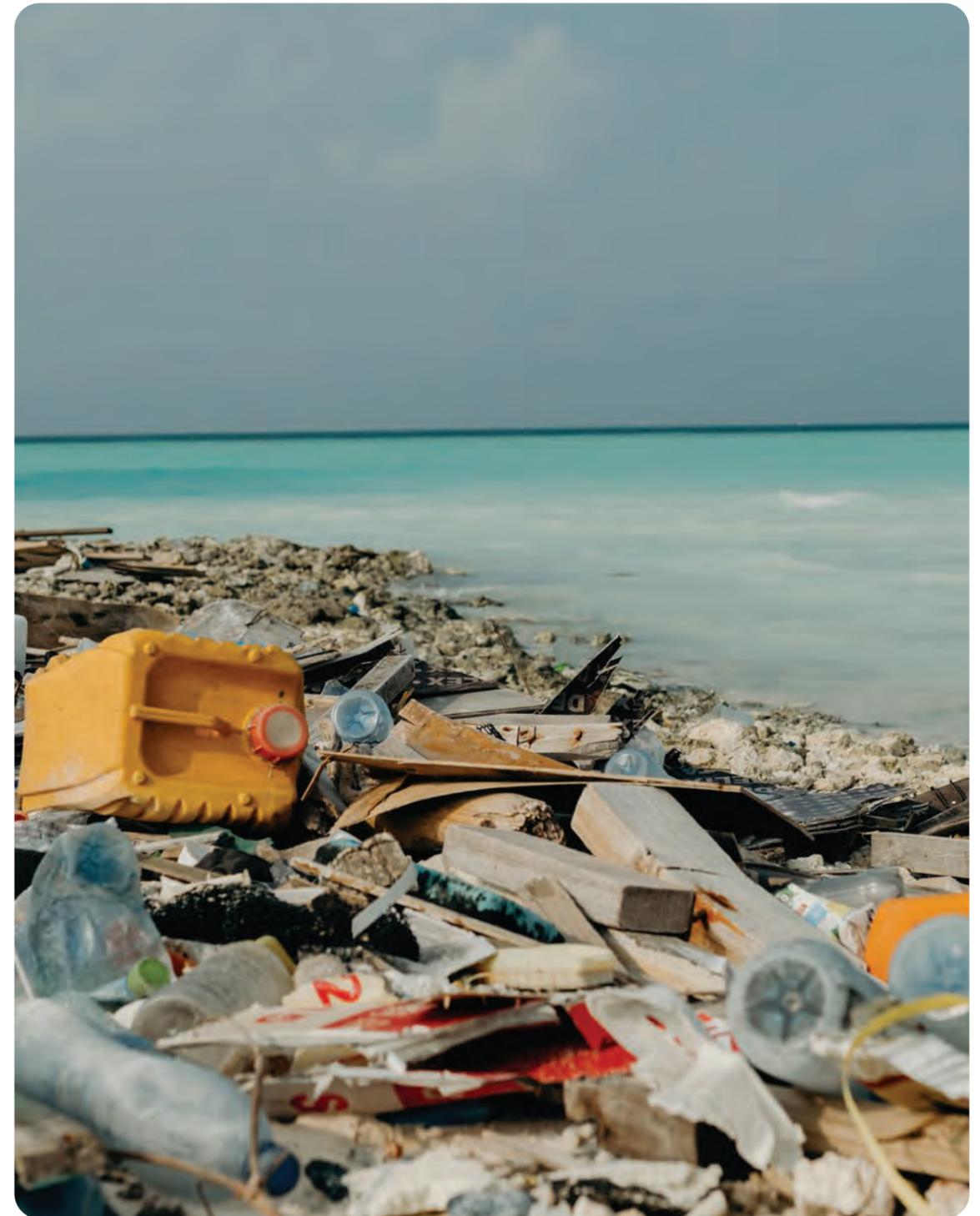


Image: © Common Seas

## Policy 3.2: DRS for all other plastic bottles

### Key considerations

A Deposit Return Scheme was in place in The Gambia for glass bottles for decades until 2020. It stopped when the Banjul Breweries closed in 2020. Thus, a similar scheme could be applied to larger plastic beverage bottles that fall outside the scope of the ban and for non-beverage SUP bottles (e.g. containing cooking oil, vinegar or bleach). Since the population is already familiar with the DRS on glass bottles, the introduction of one for plastic bottles will be embraced smoothly. A DRS on plastic bottles will encourage customers not to litter their bottles in the environment, since they will lose the deposit they have paid when purchasing the bottle if they do. It should also encourage consumers to switch to reusable, refillable alternatives. Abandoned bottles under the scope of the DRS could be collected by informal waste pickers who could return them to the collection points and receive the cash deposit. Brokers could collect the bottles, going from household to household, and return them to the collection points in exchange for cash. Current informal waste pickers could then work as brokers, buying the bottles from households, businesses and offices and taking them to the established return points or to the bottling companies where they would be paid. In any case, the informal waste sector should be consulted on the design of the DRS, to ensure it does not affect them detrimentally.

The DRS initiative will allow the government to effectively reduce the amount of plastic beverage and non-beverage bottles littering the environment.



Image: © Unsplash

### Implementation

The initiative could either be led by industry or mandated by government. If led by industry, the government could provide incentives to bottling companies and support for this to happen. If the DRS is mandated by the government, the concerned authorities will have to establish return points across the country and define the amount of the cash deposit. In either case, all brokers will have to be registered.

A small cash deposit will be placed on the plastic beverage bottles permitted in the country and those bottles will be clearly identified with a label for the population to be able to recognise them. The deposit is paid on purchase of the bottle and is returned to the consumer if they bring the empty bottle back.

Clear obligations coupled with effective enforcement will make the scope and requirements of the scheme clear. A performance target will be agreed upon, which will include specifying the percentage of all containers placed on the market to be collected and recycled. This will incentivise the organisation running the scheme to maximise return rates. In addition, the value of the deposit should be defined by the scheme but not set in the legislation. This will enable operational flexibility, should the deposit need adjusting in future to incentivise returns.

All performance and financial information should be shared and made public in annual reports to allow any third-party stakeholders to check the performance against the targets specified in the legislation.

A first phase will be for the government to announce the implementation of the DRS through a communication campaign specifying the starting date of the initiative and informing the public on how it will work. The communication campaign should be nationwide, and allow the public to be familiar with the label on the bottles under the DRS. The return points could be located at local shops, super and mini markets, where shoppers will be able to reclaim their cash deposit when returning the bottles.

## Case Study: DRS in the Marshall Islands



### The Republic of the Marshall Islands introduced a legislative DRS in 2018, targeting PET beverage bottles, aluminium cans, and glass bottles.

The deposit was set on top of the price of the product itself at \$0.06, of which \$0.05 is returned to the consumer when they bring the container to one of two manual collection centres, both operated by the public sector. The remaining \$0.01 is taken as a handling fee to fund the operation of the scheme. Further funding comes from the revenue from selling returned packaging to recyclers, and from the value of unredeemed deposits. The first year of the scheme saw a return rate of 109%, which is likely due to high returns of non-DRS bottles bought prior to the DRS implementation (Reloop, 2022). Some of the factors that contributed to the success of this policy include:

- Sufficient supporting infrastructure: Supported by the Japanese Government, the systems operator (a state-owned enterprise) had an equipped recycling shed. This facility played a crucial role in ensuring that when the law became effective. There was a well-established infrastructure capable of handling the return of 15 million cans and bottles, occasionally reaching up to half a million per week, brought in by the public for refunds.
- Sufficient seed funding: the allocation of initial funds by the government to ensure that the program could survive the first few months, when deposits would be less than refunds due to legacy waste, played a strong role in ensuring the ability of the scheme to carry itself.
- Strong leadership and political will: the scheme was supported by various levels of government including the President of the Republic of the Marshall Islands, the Minister of Environment, key actors in the Ministry of Finance and the General Manager of the Environmental Protection Agency (EPA; in charge of implementing the law), who were all enthusiastic about the benefits that a scheme of this nature could bring.
- Consistent communication with stakeholders and the public: Effective communication with all stakeholders played a vital role in encouraging their positive participation. The EPA took on the responsibility of being the central communicator and project driver, ensuring that stakeholders were well-informed throughout the program's implementation. Additionally, the EPA produced public information announcements during the system's launch to keep the public informed about the initiative.

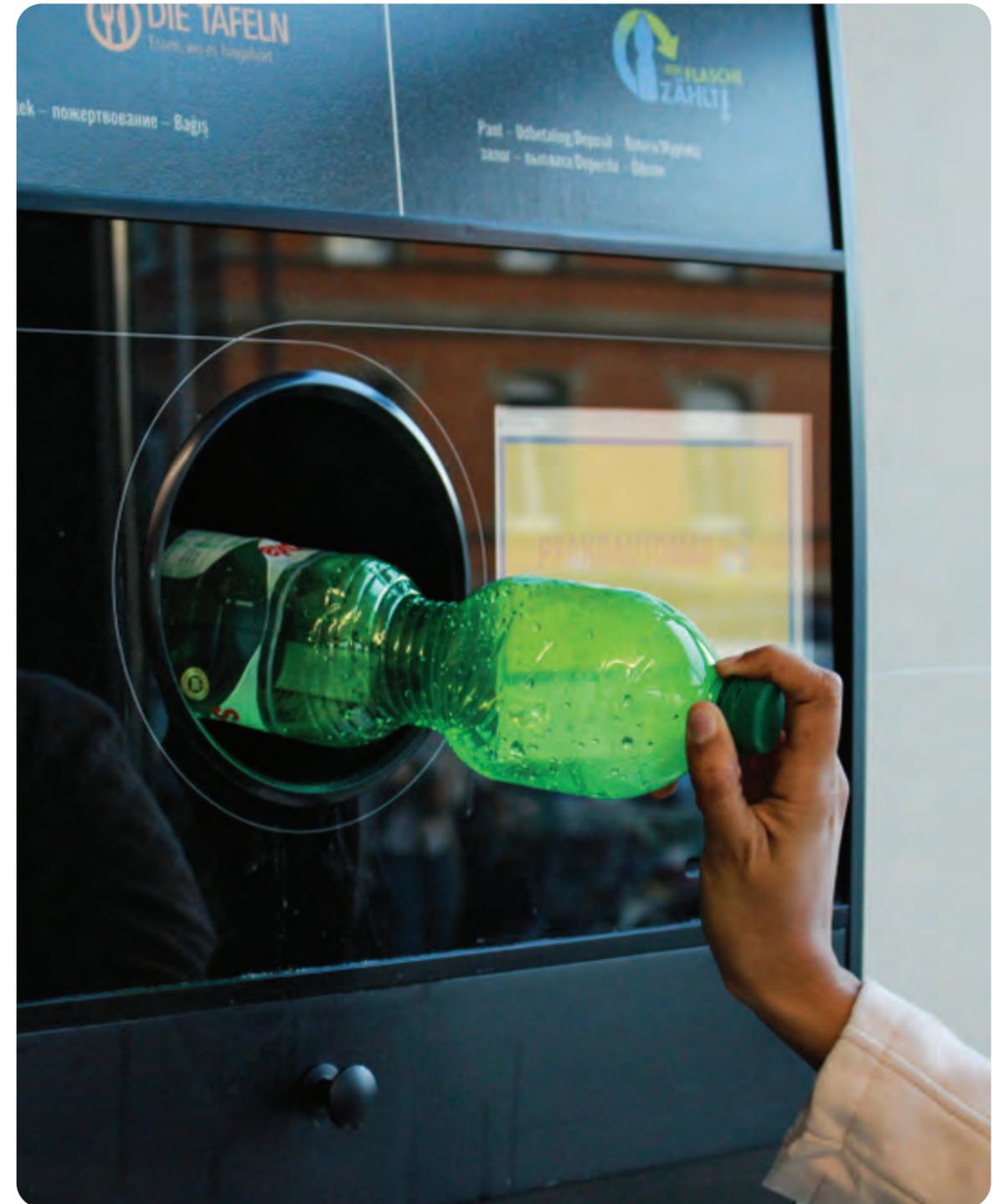


Image: © Unsplash

● **Strategy 4:**  
Tackle 'on-the-go' food and drink plastic packaging

The "on-the-go" SUP food and drink items, such as coffee cups, water cups, and straws, litter the beaches and other public areas.

"On-the-go" SUP food and drink items, such as coffee cups, water cups, and straws, litter the beaches and other public areas. For takeaway food, plastic and aluminium take-away boxes are the most common and Expanded Polystyrene (EPS) boxes are still found.

Besides being used by restaurants and catering services, "on-the-go" (takeaway) SUP food and drink items, such as cutlery, drinks stirrers, straws, and EPS take-away boxes, cups, and plates, are also used in social events like naming ceremonies and weddings.

Thus, in this strategy, we suggest implementing two policies to help tackle the plastic pollution caused by "on-the-go" food and drinks single-use plastic items:

- Ban selected SUP food and drink packaging items; and
- Introduce a charge on those SUP food and drink packaging items that are not banned.

It is suggested that governance responsibility for the ban on select food and drink packaging items fall under the NEA with support from MECCNAR. Periodic checks of hospitality businesses and retailers should be undertaken to ensure banned items are not sold to consumers. If a reuse scheme is to accompany the ban, this could be implemented by the private sector, or a combined public/private effort. Charges on SUP food and drink packaging could be overseen by the NEA with support from the Gambia Revenue Authority and Ministry of Finance and Economic Affairs (MoFEA).

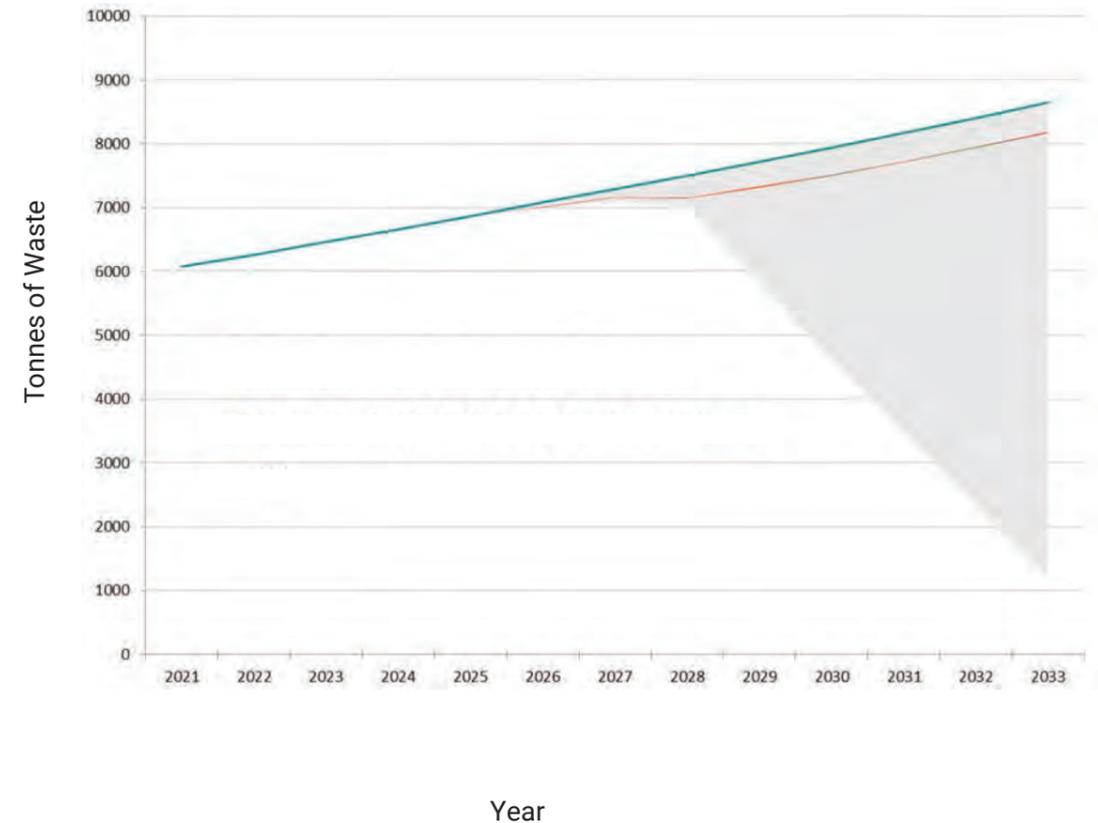


Image: © State of Mic

**Strategy 4: Policies**

- BAU
- Policy 4.1: Ban of selected SUP food and drink packaging items
- Policy 4.2: Introduce a charge on those SUP food and drink packaging items that are not banned.

**Figure 22: Shows the impacts of policies modelled within Strategy 4.**



## Policy 4.1:

### Ban of selected SUP food and drink packaging items

#### Key considerations

While the use of SUP items for 'on-the-go' consumption is now common, some people still bring their own container when ordering from local restaurants. Also, when serving breakfast, some local shops use reusable coffee cups and plates.

A ban on the "on-the-go" (takeaway) SUP food and drink items, such as cutlery, drinks stirrers, straws, and Expanded Polystyrene (EPS) take-away boxes, cups, and plates will require the engagement of the public and the businesses selling and using those items. It needs to take into account what sustainable alternatives exist or could be developed, and in particular, how reusable alternatives that are still being used in the country can be supported. We estimate this ban could reduce leakage by another 0.12 kilotonnes by 2033, as shown in Figure 22.

In parallel with the enforcement of the ban, a behaviour change, education and awareness campaign should be conducted. Additionally, a nationwide reuse system for food takeaway containers could be considered. This would provide an alternative solution to single-use food service items and would not require customers to bring their own reusable containers when purchasing takeaway food from local restaurants. There are several ways this scheme could be implemented, so a demonstration project, for example at one of the major food markets, would be critical to test different modes of delivery and underlying business models.

#### Implementation

The ban is to be phased in after one year, following a public education campaign, the promotion of alternatives emphasizing reuse options, and after allowing sufficient time for existing stocks of plastic and other single-use food and drink takeaway packaging to be exhausted. The ban could also be phased by item, starting with expanded polystyrene (EPS) first given it is a possible carcinogen, and then expanding to cover other SUP food and drink packaging items.

A key aspect of the education program will be to encourage food service companies to abandon single-use items altogether, not just plastics, and opt for reusable options. A deposit system could be introduced for reusable food and drinks items when purchased to consume on the go. When the items are returned, the full deposit would be paid back to the customers.

Customers will also be encouraged to bring their own reusable containers when purchasing takeaway food from local restaurants.

The sensitisation programs will also target schools to instil awareness and behaviour change in future generations.

In addition, the tourism sector will be encouraged to practice sustainable tourism and reduce the use of single-use food and beverage packaging. Exemplary practices should be encouraged, such as those undertaken by FootSteps, a SUP-free Eco-lodge, where filtered water is provided free of charge to guests in refillable bottles, where single-use straws are banned and stainless-steel straws are available, where lunches are packed and put in tea towel bags for guests going on excursions. Prizes could be awarded to companies in the hotel and catering sector that reduce the use of single-use food and beverage packaging. The effectiveness of the ban will depend on its enforcement and the promotion/availability of alternatives. The government will have to conduct research into alternatives that do not represent an additional threat to biodiversity and the environment and that are suitable for the Gambian context. Members of the Dennakuwo circular economy network could also be involved in the research aspect, emphasising reusable options. All stakeholders, including companies currently importing and selling the products that are to be banned, will be consulted and involved in the process.

## Case Study: Reuse system in Mumbai



Scaling reusable, returnable packaging is increasingly being seen as a key strategy for reducing reliance on single-use plastics and their associated waste (Ellen MacArthur Foundation, 2023). In Mumbai, a system of reusable lunch containers has been around since the late 1800s and is still widespread today. Expertly run by the Mumbai Tiffin Box Suppliers' Association, armies of "tiffin wallahs" (or lunchbox delivery workers) provide the invaluable daily service of speedily delivering home-cooked lunches to more than 200,000 busy office workers. A recent report investigated the cost-benefit analysis of scaling up reuse systems in a similar way, and found that in Kolkata alone, transitioning about 80,000 street food vendors to a reusable system would reduce plastic waste by more than 86%, create more than 2,250 jobs and give a return on investment of 21% and a payback period of 2.3 years (Zero Waste Europe, 2020).



Image: © Mumbai Tiffin Box Suppliers' Association

## Policy 4.2:

### Introduce a charge on those SUP food and drink packaging items that are not banned

#### Key considerations

A small charge will target the food and drink packaging items that have not been banned like disposable coffee cups, ice-cream cups, standup pouches and plastic fruit packaging boxes. This charge will provide the funding for additional litter collections near the high footfall areas which suffer from excess take-away litter. Also, as such a charge will increase the price of the concerned items, the demand should decrease, as people tend to opt more for reuse options and other alternatives.

The charge will be paid by shoppers and will be an addition to the product's original buy cost. The level set must be sufficient to encourage consumers to move towards employing a reusable alternative. This will incentivise circular business models and catalyse behaviour change from disposable to reusable items.

Since the charge will be used to fund additional waste collection in high-traffic areas, this will reinforce the messaging around the need for a charge and reduce the risk of it being perceived as a revenue generating initiative. Thus, the charge will help to reduce pollution caused by food and drink packaging items and encourage consumers to shift towards reusable options, particularly against a background of high inflation of food prices.

#### Implementation

The charge will be paid by the customer to the retailer at the point of sale and be remitted to The Gambia Revenue Authority. One way to introduce a charge on items, such as food and drink packaging, would be to establish enabling legislation that provides the mechanism for the scope of a charge to be extended to other items or materials (for example, via a plastics charge that has the advantage of focusing on the material, while a list of specific products would have to be updated regularly). It should also allow the charge to be adjusted, without the need for new legislation.

In parallel with the introduction of a charge on those items of food and drink packaging that have not been banned, an awareness and communication campaign should be run to promote reusable coffee cups and alternatives to the other taxed items. Additionally, clear standards, and potentially labels, will be needed and widely publicised to ensure that customs, the supply chain and consumers know which items are subject to a charge. Technical assistance and training will be required for enforcement authorities, as well as ensuring there is sufficient enforcement capacity.



Image: © Unsplash

## ● Strategy 5: Improve solid waste collection and management

We recommend improvements in waste collection and management, including improving and extending the provision of household waste collections, as well as 'on-the-go' collections in high footfall areas, the introduction of higher standards for the storage and management of waste, and enhancing enforcement to prevent littering and illegal dumping.

We estimate this could reduce ocean plastic leakage by 21.3 kilo tonnes by 2033, as shown in Figure 23.

Across all policies in this strategy, a critical consideration is the proper sensitization of the public on the issue of waste management.

The Gambian Government recognises the need to lead by example, and demonstrate that waste management, and particularly plastic waste management, is a national priority and should be treated as such. This will be done through policies that will expand waste collections to households and public spaces to keep The Gambia's environment clean. These policies will be accompanied by a public education campaign to demonstrate The Gambia's commitment to tackling plastic pollution, and clearly communicate the important role that Gambians play in supporting these efforts.

It is proposed that governance responsibility for this strategy and its related policies should fall under MECCNAR. Consideration should also be given to the potential to establish a single authority for waste management planning. This will ensure that waste management service development and delivery is coordinated and receives appropriate focus.

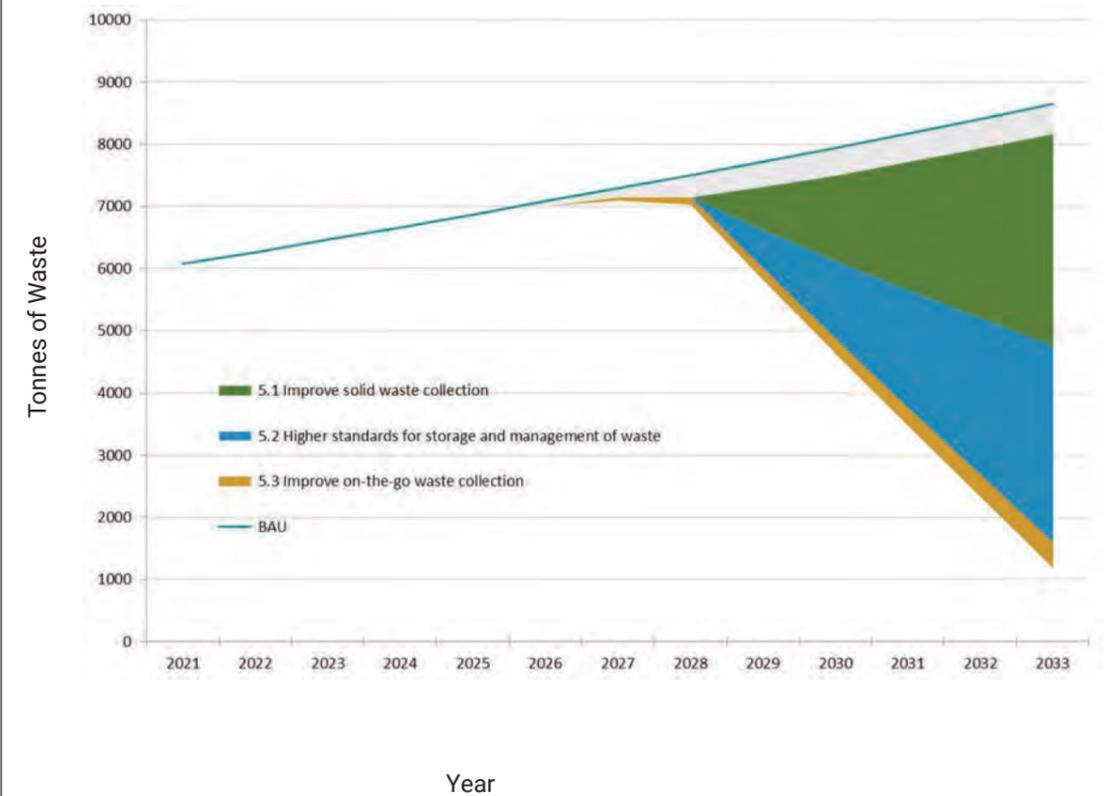


Image: © WasteAid UK

### Strategy 5: Policies

- BAU
- Policy 5.1: Improve solid waste collections and recycling
- Policy 5.2: Higher standards for storage and management of solid waste
- Policy 5.3: Improve 'on-the-go' waste collection

Figure 23: Shows the impacts of policies modelled within Strategy 5



## Policy 5.1: Improve solid waste collections and recycling

### Key considerations

The Gambia currently does not have a regular and timely collection service for household waste. In urban areas, only about one quarter (25%) of households receive a formal waste collection. In rural areas, this is significantly lower, at 5% on average. This policy thus involves improving solid waste collection in both urban and rural areas as well as plastic recycling. Examples of best practice (e.g. Kanifing Municipal Council) should be studied to understand the factors that led to its success and adopt it more widely.

There was strong recognition and support for this policy in the stakeholder workshops. As such it is one of the key policies selected to include in this National Action Plan. However, understanding the challenges that have led to sparse coverage of waste collection services will be important. Key challenges in The Gambia are the lack of available finance and infrastructure. Additional challenges include poor road quality in rural regions (National Roads Authority, 2022), lack of well-maintained collection vehicles and long distances between formal landfill sites. Infrastructure requirements and related financing will thus be a key consideration for this policy. These must be identified to ensure that improving waste management does not just become a burden on municipalities and the informal sector.

Developing effective waste segregation at source will be required to allow clean recyclable plastics (and other materials) to be separated for recycling. Clean, separated materials will have value as inputs for recycling processes. Assessing the impacts of the pilots conducted in Kanifing Municipality, which included household waste sorting and establishing waste transfer stations in five communities, will aid in developing waste segregation practices more widely. Developing recycling capacity will be essential as well.

It is crucial to gain a clear understanding of the current arrangements for collecting, moving and recycling plastic waste, both domestically and for export. This understanding will help support plastic recycling initiatives with viable end markets. Before COVID-19, clean segregated plastic was exported to Senegal for recycling. There are also opportunities to develop local markets and reprocessing capacity for recycled plastics. Lessons from, and linkages to, existing recycling initiatives in The Gambia, such as WasteAid and Plastic Recycling Gambia's partnership and WasteAid and the Chartered Institution of Wastes Management's 'Circular Economy Network' project in the Greater Banjul Area (see p. 45 for details), should be sought.

The informal sector will be particularly important for this policy, so early engagement and involvement to understand their contribution and future support must be prioritised. Most waste pickers working at the three main dumpsites collect metals and plastics and sell them to recyclers. Their activity is stigmatised, and they have little safeguarding for their livelihoods. In Kanifing Municipality, the Council also works with waste collectors using donkey carts to be able to extend the areas where solid waste is collected. The carts can access streets too narrow for the trucks to enter and the waste collectors get paid directly by the households.



Image: © WasteAid UK

### Implementation

The first key step before designing the enhanced waste collection system will be to undertake an options appraisal, led by the National Environment Agency in collaboration with the councils, to understand the impact of different scenarios. These will be developed and modelled and may include increased residual waste collection frequency, increased geographical scope, etcetera. Priority capacity building needs for local councils and informal waste management actors should also be identified and addressed.

If the design involves new vehicles and other capital expenses, time for procurement of these should be factored in ahead of planned system roll-out.

A household communication awareness programme will inform residents of forthcoming service changes. As consumers receive better services their engagement will improve which will lead to better participation and lower misuse, spills, etcetera.

## Case Study: Leveraging the informal sector to improve solid waste collections in Pune, India

Solid Waste Collection Handling (SWaCH) is a wholly owned workers' cooperative that was developed as a public-private partnership in 2007. The cooperative entered into a five-year contract with the Pune Municipal Council in 2008 and was renewed for 2016–20. The partnership offered an alternative to privatising waste collections that incorporated larger issues and processes that were consistent with Pune's vision of operationally, financially and environmentally sustainable waste management that required the participation of workers and other residents. (The Circulate Initiative, 2021)

Today, SWaCH has over 3,000 worker-members (all women) that provide door-to-door waste collection services in exchange for user fees paid by each household; they sort the waste and drop off non-recyclables at city-run feeder points. They earn incomes from the user fees and by selling recyclables to local scrap dealers. (WIEGO, 2012)

Due to the SWaCH Cooperative's initiatives, today, 60 MT of waste is diverted away from landfills per day, with up to 85% of the waste generated in the city being recycled or processed, resulting in annual greenhouse gas emission savings of approximately 50,000 tonnes of CO<sub>2</sub> (Centre for Public Impact, 2021)



Image: © Solid Waste Collection Handling

## Policy 5.2: Higher standards for storage and management of solid waste

### Key considerations

This policy is focused on enhancing the standards and enforcement procedures related to the storage, transport and management of plastic waste to reduce litter and other leakage of plastic waste items at various points in the waste management system.

Specific measures would depend on obtaining a more detailed understanding of the existing problem. However, it could include improving containment of waste while it is waiting to be collected, deploying more enclosed vehicles to prevent loss of plastic while waste is being transported to the landfill or dumpsite and upgrades to the practices undertaken at the Bakoteh, Bund Road and Tambana dumpsites, to prevent windblown release of plastic waste.

Much of this can be done through identifying and adopting best practice examples more widely. For any significant infrastructure upgrades required at the landfill, funding will be a major consideration.

There was also strong recognition and support for this policy in the stakeholder workshop. In order to ensure the standards are upheld, monitoring and enforcement will be a key consideration.

### Implementation

The approach taken to improvements to waste transportation, storage and handling, as well as landfill site upgrades are typically informed by a baseline survey. The baseline survey could focus on three main areas where plastic waste may leak into the environment: during waste collection, waste transport and at waste management sites. Depending on the findings from the survey, options for interventions should be focused on the highest leakage points.



Image: © WasteAid UK

## Policy 5.3: Improve 'on-the-go' waste collection

### Key considerations

'On-the-go' waste collection refers to collections of waste items that are typically associated with products consumed away from the home (e.g. food/drink related packaging, cigarette butts, etc). These items make up a large portion of items littered in our environment. For this reason, improving 'on-the-go' waste collection is particularly important in high footfall areas, such as markets, transport hubs and tourist areas.

Improving on-the-go waste collection could be done through providing and maintaining street litter bins and regularly sweeping streets in high footfall areas, engaging with local retailers and businesses to accept on the go waste for disposal from customers, awareness campaigns for the public and collection/ maintenance activities for the services provided.

Events are another key source of on-the-go waste, for which collection systems should be prioritised. It was highlighted during the workshop that the tourism authority has, or used to have, a policy requiring those holding a gathering to seek approval and pay a deposit. They would get the deposit back if the area was left clean. However, there was a question over whether inspections were taking place. One attendee suggested using a similar approach, based on paid permits for events along the coast. The money would be returned if the area was left clean after use and would be used for cleaning up if not.

### Implementation

Implementing on-the-go waste collection typically is done through developing a litter strategy to scope out the approach, refine the resource and infrastructure requirements, and identify the funding needed.

As part of this, a study of existing bin locations, food and drink outlets, areas of high footfall concentration, and littering hotspots will inform the development of a baseline from which the litter-focused implementation plan can then be developed. The plan will set out the required infrastructure and resourcing. Increasing the quantity of bins alone would not necessarily reduce litter, so behavioral change should also be a priority, as mentioned above.

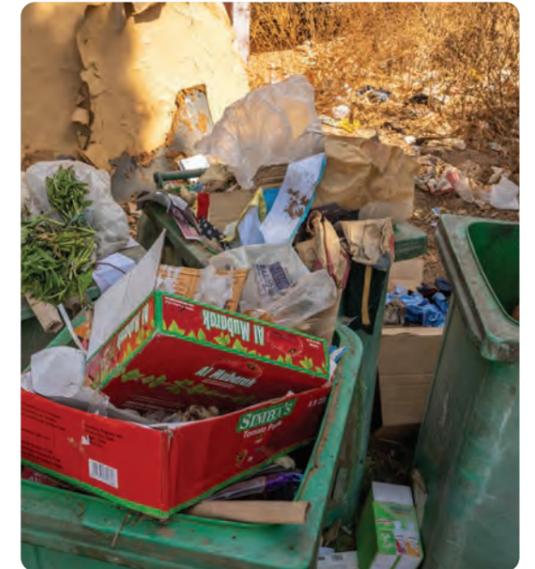


Image: © WasteAid UK

## Case Study: On-the-go waste collection in Cape Town, South Africa



In a study of urban litter in stormwater drains in Cape Town, South Africa, street sweeping removed up to 99% of the total litter load from the streets.

Some considerations for effectiveness include:

- **Frequency of sweeping:** Sweeping effectiveness varied highly depending on frequency. In the CBD sweeping was conducted 2-3 times per day reducing total litter load by 99%. In contrast, sweeping once per day in a separate location only reduced load by 83% with efficacy dropping below 50% for less frequent efforts. Sweeping frequency should be higher than the frequency of run-off producing rainfall events (above 5mm rainfall). This requires that the appropriate sweeping frequency is considered per season (Armitage, 2007).
- **Safety of sweepers:** sweepers should be provided sufficient and correct personal protective equipment to ensure that there are no risks to their job. This includes high-visibility wear, gloves, masks, and protection from the weather.



Image: © WasteAid UK

## Policy 5.4: Introduce an EPR scheme for all SU packaging

### Policy considerations

This policy proposes the introduction of an Extended Producer Responsibility (EPR) regime covering all single-use packaging. EPR provides the revenue flows necessary to support the development and operation of the infrastructure needed to collect, sort and reprocess recyclable materials. This is due to fees paid by producers, or importers, which should cover the costs of regulatory requirements, e.g., collection, recycling, litter, disposal etc. Advanced fee modulation approaches will also be considered, which apply different levels of EPR fee to different items, to reflect differences in their environmental impact and recyclability.

The EPR regime should be designed to reflect the ordering of the waste hierarchy, rewarding those producers who innovate in order to eliminate or reduce unnecessary packaging, who move to reusable and refillable alternatives, or who make their packaging easier to collect and recycle. The income generated from producers under EPR should be high enough to pay for the whole cost of collecting, recycling and/or disposing of the packaging at end of life, and dealing with litter, and should help to pay for Policies 5.1, 5.2 and 5.3.

Finally, it will also be important to consider the role of the informal sector, as they are currently the key actors allowing plastic recycling and diversion of plastic waste from landfill or the wider environment. Their activities and contributions toward these national goals should thus be included in the design of the EPR policies. It is important that they are not excluded from the process or lose access to the material if an EPR scheme is implemented.

### Implementation

There were some concerns around low technical capacity for the design and implementation of an EPR scheme. Legal specialists particularly would value support in this area. Opportunities for capacity building around the design of a successful EPR for The Gambia will thus be identified as a first priority.

Following this, a stakeholder group will be developed to lead on the governance structures and design of the EPR. Early engagement with any businesses that would be covered by the scheme is important to develop buy-in. This can be supported by involving international brands. They have become very supportive of EPR schemes because they can deliver a clean supply of recycled material. This helps them to meet their publicly stated goals around reducing the amount of virgin plastic in their packaging.

While the national scheme is developed, it is also key to develop regional collaborations, to help tackle the issue of cross-boundary movement of products and neighbouring markets, namely Senegal.



Image: © Unsplash

### Box 1: Extended Producer Responsibility

At its most basic, EPR provides the revenue flows necessary to support the development and operation of the infrastructure needed to collect, sort and, reprocess recyclable materials. However, if used in a more ambitious way, EPR can also be used to promote waste reduction, reuse and refill. It can incentivise producers to redesign products and delivery systems to minimise the quantity of – or entirely avoid - waste generated at end of life. In this sense, EPR can be applied as an instrument to stimulate innovation as part of a transition to a circular economy.

An EPR scheme could be developed at the national level in The Gambia and could have an initial focus on packaging, with the types of products or packaging covered being clearly defined (including plastic, glass, metal, paper/cardboard, wood, and composite product packaging). Inclusion of other items containing plastic will be considered over time (for instance, electronics, electrical appliances, tyres, end-of-life vehicles, furniture, textiles, paint and coatings, pesticides and fertilizers).

The fees paid by producers, or importers, should cover the costs of the regulatory requirements, e.g., collection, recycling, litter, disposal etc, and advanced fee modulation approaches (which apply different levels of fee to different items to reflect differences in environmental impact and recyclability) will be used after a certain time (e.g., three years). The modulations would be important in ensuring transparency around how the funds are being used.

In terms of public awareness, consumers should understand that the current price of items they consume does not reflect the true price of their management at end of life. Awareness campaigns will aim to influence purchasing habits (towards reuse/refill) and create demand signals. Supporting policies around reuse/refill will assist with this and consumer information will encourage separation of recyclables at the household level.

It will be important to prioritise capacity building (regulatory, implementation, reporting, monitoring). A data collection system for import and export data may be needed if not already available, which will support monitoring progress towards targets. Auditing of the producer responsibility organisation (PRO) to ensure proper management is essential, as well as auditing of producers selling products within the country to ensure they are signed up to the scheme and paying the required fees.

Labelling on packaging provides information on whether the producer has joined the PRO (and helps keep track of free riders) and on whether the packaging is recyclable. This all helps the consumer and contributes to improving recycling figures.

The scheme would be evaluated regularly to ensure the scope of products and packaging are up to date, whether the need for any exemptions has changed or not, and whether the level of any targets needs to be adjusted. Evaluation and improvements should be made at least every three to five years.

The issues associated with product design and supply chains extend beyond The Gambia and into the broader region and global supply chain. International cooperation on EPR design will form a key part of this policy, starting with fostering collaboration between PROs in neighbouring countries. A regional approach can help develop harmonised standards, policies, and targets across multiple countries simultaneously.

**The Gambia could establish itself as a key leader in applying EPR to tackle plastic pollution in the region, particularly as this concept gains traction in international negotiations for the UN Global Plastics Treaty.**

## Key Enabling initiatives

### Education & Youth Action

The children and young people of The Gambia are the future leaders, innovators, artists, engineers and citizens, so it is critical every school student can access the skills, knowledge and experience they need to help build a cleaner, greener and fairer future. Young people can also play a key role in mobilising action within their families, schools and communities.

An education programme will be designed and implemented to provide young people with deep, practical learning experiences about plastic, that create understanding and agency to support achievement of the National Action Plan, as well as wider sustainability and climate change initiatives.

The programme will combine fully resourced lessons and professional development for educators with practical learning support for young people to enhance the school and community environment. Collectively, this will support time-poor educators to formalise learning on sustainability and the plastics crisis and put children and young people at the heart of the action. This will, in turn, support them to lead on reducing plastic waste in their schools, while building essential skills for active citizenship beyond the classroom.

Image: © State of Mic



### Behaviour Change Campaign

A general public engagement and education campaign will be essential to raise awareness of the plastic pollution challenge and to encourage all stakeholders to play their part in implementing all of the policies identified in this National Action Plan. Positive action and behaviour change will be critical in achieving the National Action Plan's overall aims, including reducing consumption of plastic, particularly single use items, and addressing the leakage of plastic into the environment through littering and illegal dumping. Examples of what will be required to support implementation of specific policies are included in strategies 1 and 2 at the beginning of this chapter.

A detailed behaviour change campaign will be developed at the start of the National Action Plan implementation phase. It will be based on comprehensive stakeholder mapping to ensure that it targets the right stakeholders, in the right way, and at the right time. Clear and targeted messaging will be important to engender behaviour change, recognising that different stakeholders (e.g. householders, hotels, retailers and other businesses) will have different perspectives and priorities.

The campaign will utilise a range of engagement techniques as part of a clear long-term programme to raise awareness, promote changing behaviours and provide information. It is recognised that this will need to go beyond communicating the scale and nature of the plastic pollution problem in The Gambia, to provide information that helps consumers and businesses make positive change and ensure that behaviour change is embedded in the long term.

Techniques are likely to include billboard, radio, television and social media messaging, as well as roadshows, community "bantaba" meetings, role-play sketches and tailored songs by female groups to provide direct face-to-face engagement with stakeholders. Inclusion of plastic pollution as an issue covered by schools and other educational establishments will also be important (see above). This is a key way to communicate the issue and to equip the next generation with the understanding and tools needed to reduce plastics pollution for the long term.

Another element will be to frame waste management as a key utility provided by the government. The rationale for such an approach is that if people understand the true cost of waste management, not just financially to the government, but also its impact on the environment, they may be more willing to take on board the actions envisaged under the National Action Plan.

The behaviour change campaign programme will be reviewed and refreshed periodically to ensure that the approach is appropriate and effective.

### Tackling plastic pollution will require major changes to the way plastic is used in The Gambia. These changes could have negative impacts on several vulnerable socio-economic groups in society, including:

- Women – who are an important constituency within each of the three vulnerable groups discussed below;
- Low-income consumers – who currently buy items in some of the plastic products (e.g. water bags or cups) that are to be banned, due to their low cost;
- Market vendors – who currently sell some of their items in the plastic products that are to be banned; and
- Waste pickers and others in the informal waste sector – whose livelihoods currently depend on collecting, sorting and selling on recyclable plastics (and other materials).

### Women

In The Gambia, women are frequently responsible for managing the household budget and making decisions on daily food purchases. At the markets, most vendors are women. Many waste pickers are also women. This makes it particularly important that the views of women are sought during the policy development process, to ensure that the policies take account of their practical knowledge of the challenges faced by vulnerable groups in The Gambia and that the potential impacts of policies on women are addressed.

### Market vendors

Market vendors have low profit margins and often sell their products in small quantities to lower-income consumers. They therefore use the lowest cost packaging options available, including the SUP items targeted for bans or charges under this NAP.

To avoid opposition from market vendors and gain their positive buy-in to the policies in this NAP, they should be engaged early in the policy development process. Targeted education and engagement activities should be implemented to help them understand the problems of plastic pollution and the reasons why specific SUP items are being targeted by this NAP. They should then be supported in identifying more sustainable alternatives that are also affordable. Circular business models (e.g. offering a 5% discount to consumers who bring their own bags, bottles or food and drink packaging with them) should be encouraged for adoption. It is also essential that market vendors, particularly women who are an important constituency within market vendors, are effectively supported to transition away from single-use plastics targeted by bans and charges. The development of reusable alternatives will be particularly important. For instance, there could be dedicated financial support to manufacture reusable bags and other reusable items locally. This support could also include training and resources.



Image: © iStock

### Low-income consumers

Consumers with low incomes are more likely to buy small quantities of the items that they want (e.g. water, oil), as and when needed, since they cannot afford to buy in bulk. Such consumers will potentially find it more difficult than others to adapt to some of the proposed bans (e.g. on small water bags/cups, smaller format beverage bottles, certain SUP food & drink packaging types) and charges (e.g. on some unbanned SUP food & drink packaging), as they will find it hard to afford the more expensive alternatives.

This should be addressed during the policy development process by consulting with representatives of low-income consumers to understand what the main impacts on them are likely to be, and then addressing these in the design and implementation of each policy. For example, the impact of bans on plastic products can be minimised by ensuring that more sustainable alternatives are made available at low cost during the phase-in period for each ban. Examples might include promoting the retention and reuse by consumers of existing bags, bottles or other packaging, or encouraging local businesses to offer more sustainable alternatives free, or at a discount, as part of a loyalty scheme (e.g. 'Buy 10 products from us over time, get 1 sustainable packaging item free/half price').

### Informal waste sector

Waste pickers and others in the informal waste sector are the most vulnerable to occupation disruption from improvements of the waste management system and investments. A just transition requires that these disruptions are addressed.

It is estimated that there are between 700 and 900 informal waste pickers active in the Greater Banjul Area (Hydroplan, 2023). Most of them work in the three main dumpsites, Bakoteh, Bund Road and Tambana, and their work is complementary to the waste management activities of the councils. They are the key actors of the recycling economy, as there is no waste segregation at source, and they

are the ones sorting plastics (and metals), both at the formal dumpsites and at illegal ones. Without them, the recyclable materials wouldn't be accessible and recycled. The waste pickers contribute to the reduction of plastic waste pollution at the dumpsites and in public areas, and, by allowing recycling to take place, also contribute to the decrease of greenhouse gas emissions.

Informal waste pickers need government support. They usually work long hours, without personal protective equipment nor adapted tools, and are exposed to health and safety hazards for many hours during each working day. Some of the waste pickers live in the dumpsites and some children even accompany their parents working there (children's presence is forbidden only in Bakoteh). The waste pickers lack social protection, and their activity doesn't seem to offer them a way out of poverty. In addition, waste pickers and marginalised populations are the most exposed to the impacts of plastics on the environment. This is through exposure to the pollutants released from burning plastic, and living in or close to landfills or dumpsites, or areas with increased floods due the canals clogged by waste, affecting mostly underprivileged neighbourhoods.

The transition to improved plastic waste management should build and improve upon systems that have already been established by waste pickers, while guaranteeing better and decent work opportunities, social protection, training opportunities, technology transfer, support for the organisation of workers, and greater job security for workers in the waste sector. It is also essential to ensure that children do not work and are not brought to landfills, and that marginalized populations, especially living close to landfills or dumpsites, are protected from the environmental impacts of plastic pollution, including from pollutants released from accidental or intentional burning of plastic.

### Environmental justice

The Gambia processes large quantities of second-hand items, ranging from clothes to cars and tyres, as well as furniture, electronic and decorative accessories. Some of these are rapidly reaching the end of their useful life and contribute to plastic pollution - as these items are often fully or partly composed of plastics. Second-hand tyres are a good example of a product that contributes directly to plastic pollution. Furthermore, those imports add pressure to The Gambia's waste management challenges, and, once again, the more marginalized populations in the country. Ensuring that only products that are still in a good condition can be imported will allow The Gambia to reduce plastic pollution, as well as reducing the pressure on the already constrained waste management system.

To ensure that the transition is fair and inclusive:

- Further research is needed to understand the contribution of waste pickers, and the impact of plastic pollution on the poorest segments of the country - including on children's development, and general population health.
- Appropriate stakeholders should be included in the design, monitoring, and evaluation of all policies to tackle plastic waste and waste management - including groups of waste pickers, of women, market traders, NGOs working with marginalized communities, the general public, etcetera. Asymmetries of power mean that marginalized groups might need further empowerment to ensure that their participation in policymaking is genuine.
- Public awareness and education should include the recognition of the work done by waste pickers, and their contribution to reduced greenhouse gas emissions.

### Regional cooperation

All countries forming the West African sub-region are facing challenges when it comes to the management of plastic waste. Eleven of them have introduced bans on single-use plastics, including Senegal, which has announced a ban on SUP water sachets and coffee cups in 2020 (Issahaku et al., 2020). However, enforcement of policies to tackle plastic pollution is low in the sub-region, and plastic pollution, especially from single-use plastic items, is a major environmental and health issue.

There are several ways in which regional cooperation could help The Gambia to tackle its plastic pollution problem. These include:

- Improving the control on transboundary movements of hazardous waste through better implementation of the provisions of the Bamako Convention, which The Gambia has ratified;
- Closer coordination with Senegal over the implementation of plastic bans in each country, to minimise the risk of cross-border smuggling of banned plastic items from one country to the other;
- Initiatives emerging from the West Africa Coastal Areas Management Programme (WACA), managed by the World Bank;
- Regional strategies on plastic pollution currently under development by ECOWAS (Economic Community of West African States) and WAEMU (West African Economic and Monetary Union).

Further details about each of these points is contained in the appendix.

**Plastic pollution is a complex challenge which requires a long-term, systemic change to solve. This National Action Plan presents an ambitious but achievable programme for tackling plastics pollution in The Gambia. The extensive work undertaken in preparing this National Action Plan identified wider issues that will be important to consider and address in the long-term.**



Image: © State of Mic

### Abandoned, Lost or Discarded Fishing Gear (ALDFG)

Assessment using available data suggested that the relative quantity of marine plastic pollution arising from lost and abandoned fishing gear is relatively low in The Gambia (1.3 tonnes per year). However, it has a high impact, not only on marine life but also marine sectors, with for instance, nets entangling propellers. There are also conflicts around gear, with incidents where trawlers cut the fishing nets of the smaller artisanal fishers. Enforcement against this type of malpractice is lacking.

Common Seas has assessed several measures that could be used to tackle plastics pollution associated with this sector, linked with design, use, and end-of-life collection and treatment of fishing gear.

More generally, responsible fishing practices need to be developed and included into fishing licenses. For instance, licenses should include fishing gear restrictions on those deemed particularly vulnerable to becoming ghost gear, require gear marking and gear design standards, as well as the reporting and retrieval of lost gear. Reporting of lost gear could be made mandatory. GPS trackers and electronic identification systems could be explored to see if they can help trace abandoned, discarded, or lost fishing gear.

It is essential that collection, ease of disassembly, recycling and safe disposal are facilitated. Collection should be accessible with disposal facilities at and around ports. EPR schemes applied to fishing gear could help fund the proper collection, recovery, recycling, and disposal of these items. There could also be final incentives such as buyback or deposit-refund schemes to incentivize the return of abandoned and retrieved lost gear.

Fishers should be trained on proper gear handling and disposal practices, before, and in the long term, ahead of penalties for non-compliance and the possibility of suspending fishing licenses implemented. Remediation of legacy pollution from ALDFG also needs to be considered.

Action in that area could be done in collaboration with Senegal, where policies targeting fishing gear have been implemented.

Initial assessments suggest that tackling this flow could reduce plastic pollution by ten tonnes by 2033.

## Microplastics

The Plastics Drawdown assessment identified that microplastics - in the form of pellets, clothing fibres, tyre and brake wear and microbeads - comprise a large part of plastics pollution generated in The Gambia. A series of measures could potentially address this, including the introduction of a ban on the import, manufacture or sale in The Gambia of cosmetics and personal care products which contain plastic microbeads. Such microbeads are washed straight down the drain and are an important source of microplastics leaking into the environment. The ban could be phased in after a year, allowing time for existing stock to be used up and alternatives that do not contain microbeads to be sourced. This is an area where implementing a policy may be relatively simple. Banning the use of microbeads in cosmetics and personal care products will require engagement with the supply chain to encourage compliance and the use of alternatives.

Additional measures will target other sources of microplastics:

- Regulations to reduce tyre wear by setting clear standards for tyre quality and wear rates. These could include limitation of the importation of used tyres.
- Regulations to implement a fibre release threshold and label clothing to reduce microplastics emissions from the washing of synthetic textiles.
- Regulations to improve controls over pre-production handling of plastic pellets (the precursor of most manufactured plastic products and items).

It is important to recognise that these policies for addressing microplastics pollution are very much under development and have not been tested. Given the estimated quantities of microplastic waste generated, it is important that the government of The Gambia consider these types of potential instruments for its long-term planning. In particular, it will be important to engage with international activities on these issues.

Initial assessments suggest that tackling this flow could reduce plastic pollution by 1.12 kilotonnes by 2033.

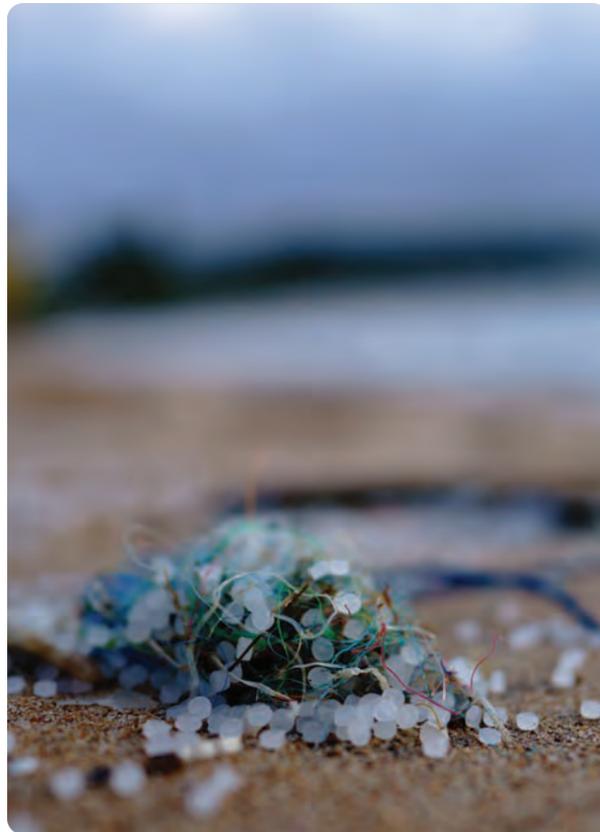


Image: © Unsplash

## Additional bans/charges on products containing plastic

Other problematic items containing plastic were identified, and policies suggested for implementation include the following.

Introducing a charge on imported disposable diapers, to be paid by the importer to The Gambia Revenue Authority, could help raise income to be used to:

- Promote adoption of reusable diapers by parents – e.g. by subsidising inclusion of a trial pack of reusables in materials given to new mothers in maternity wards (Mbolo Association has a pilot project on reusable diapers in Tujereng);
- Support improved collection and management of disposable diaper waste, particularly in urban areas; and
- Promote to parents the importance of safe collection and disposal of used disposable diapers.

SUP wet wipes could be targeted with a ban, to be phased in after a year, allowing time for existing stock to be used up and non-plastic or reusable alternatives to be sourced.

Finally, the provision of dedicated cigarette butt bin infrastructure in urban areas and on public and resort beaches, with complementary signage highlighting the environmental benefits of not littering butts, could help reduce plastic pollution linked to cigarettes.

On a wider note, it will be important that the evolving science and understanding of both the plastic pollution problem and the efficacy of different measures for addressing it are kept under review, so that the National Action Plan can be adjusted and refreshed to reflect evolving knowledge and best practice on the issue. The National Action Plan will be periodically reviewed and updated (see Monitoring and Evaluation Section below). The Gambia may contemplate restricting the importation of plastic and instituting a comprehensive plastics tax that encompasses all items containing plastic materials.

Driving beyond an 86% reduction will require an ambitious, integrated approach to policy on plastic pollution, but this approach has the potential to maximise the effectiveness of different policies by combining effects, raising public awareness and establishing The Gambia as a leader in the region in tackling plastic waste.

Image: © WasteAid UK

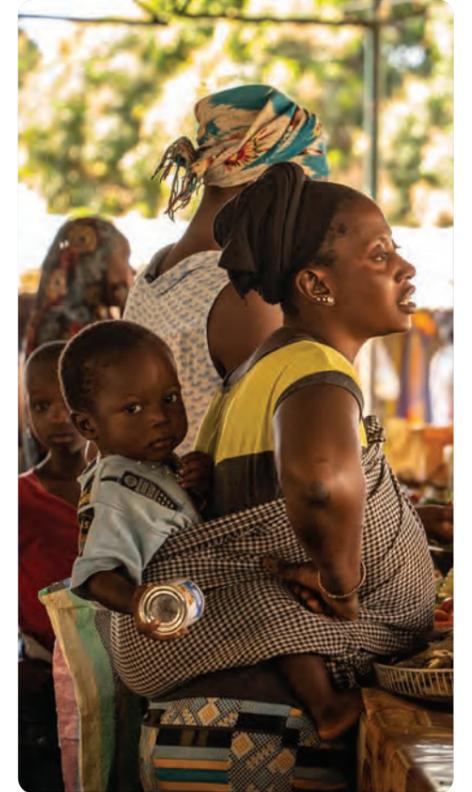


Image: © Unsplash

## Roadmap to Tackle Plastic Pollution

### Without action, plastic pollution in The Gambia is set to increase by 42% by 2033.

To address this, The Gambian government has laid out this National Action Plan (NAP) detailing five key strategies (incorporating 13 policy interventions) that could reduce plastic pollution by 86% over 10 years.

Achieving this impact will require coordinated action by government stakeholders along the plastics value chain.

The Roadmap on page 98 outlines the major steps to delivering the NAP. Each stage of work – from policy design to implementation – is illustrated, along with key milestones. Actions in each stage will differ by policy.

However, generally, the **DESIGN STAGE** may involve a legislative review to understand the legal framework for implementing the policy. This will involve supporting research and a feasibility study to review the policy considerations, and the early stage of the consultation process. As part of this process, key stakeholders will be defined, and the feasibility study results will be presented to them. The policy design would be scoped and refined, and an impact assessment undertaken - along with ongoing stakeholder consultation. Governance arrangements would also be defined.

This stage also involves any testing, trials, or demonstration projects. Public consultation would be undertaken during this stage, if required. An implementation plan would be developed and practical and logistical set-up arrangements, such as; policy operator; infrastructure; reporting; training; and enforcement measures would be put in place. A public awareness campaign would also be launched.

The **IMPLEMENTATION STAGE** sees the point at which the policy is rolled out. In some cases, this may be a phased approach.

## Timeline

### SHORT TERM (YEARS 1-3) – PREPARATION AND IMPLEMENTATION OF KEY POLICIES



The first year of the roadmap implementation will involve a review of the 2015 Plastic Bag Ban Order, to understand the policy's effectiveness. The legislative review will identify any gaps or areas for improvement, and any inconsistencies or conflicts with other laws. Once this review has been undertaken, the Plastic Bag Ban Order will be updated and enforcement improved. Technical standards for reusable bags will also be developed and a competition inviting citizens to design a reusable shopping bag for The Gambia launched.

Some quick wins will also be prioritised in the short term. This will include the trialling and rolling out of the first water refill points (policy 2.3) and banning small SUP bags (policy 2.1), SUP water bottles under 500ml (policy 3.1) and some SUP food and drink packaging items (policy 4.1). Importantly, these bans will be preceded by a thorough review of suitable alternatives, to prevent unintended consequences, as well as capacity building to ensure adequate enforcement capacity. These policies will also be accompanied by public consultations and awareness campaigns to begin sensitisation around the upcoming policies to tackle plastic pollution and obtain buy-in.

Clear leads for each component of the action plan will be identified, with responsibilities being shared amongst different departments to ensure appropriate expertise is in place and to draw on capacity across government. These responsibilities will be set out clearly when establishing the NAP governance arrangements (see page 100).

#### KEY ACTIONS:

- Review and update existing Plastic Bag Ban Order
- Launch of design competition for reusable shopping bags
- Develop technical standards for reusable bags
- Rolling out first water refill points
- Ban on small SUP bags, SUP water bottles under 500ml and some SUP food and drink items
- Public awareness campaigns



## Timeline continued

### MEDIUM TERM (YEARS 3-5) - FURTHER IMPLEMENTATION OF POLICIES AND REVIEW OF IMPACT

In the medium term, the DRS for plastic bottles that fall outside of the scope of the ban will be launched (policy 3.2). This will be preceded (during the design phase of the policy) by a clear, nationwide communication campaign by the government to introduce the scheme to the public, informing them of how it will work. Return points across the country will need to be established and the amount of the cash deposit defined.

Improving the supply and quality of potable water (policy 2.3) will also be implemented during this period. Initially, this may involve the installation of water filters in households and businesses, along with regular water quality testing and publishing of results to improve public confidence. Longer term, increased investment will be needed in the public water supply infrastructure to improve both quality and coverage.

Charges on SUP food and drink packaging that fall outside of the ban (policy 4.2) and improved 'on-the-go' waste collection (policy 5.3) will also be implemented during this period.

By the end of year 4, most of the policies will have been implemented (except for policies 5.1, 5.2 and 5.4) and the focus will be on analysing data and reviewing the impact of policies. It will also involve the design stage for the longer-term, more ambitious policies of introducing an EPR scheme for all SU packaging, higher standards for storage and management of solid waste and improving solid waste management. This will include identifying infrastructure requirements and financing needs and running public awareness campaigns.

#### KEY ACTIONS:

- Introduce DRS scheme for plastic bottles that fall outside the scope of the ban
- Improve supply and quality of potable water
- Introduce charge on SUP food and drink packaging outside the scope of the ban
- Improve 'on-the-go' waste collection



Image: © Unsplash

### LONG-TERM (YEARS 5 AND BEYOND):

This stage would see the implementation of the EPR scheme (policy 5.4) and improved solid waste management (policies 5.1 and 5.2). This time period is intentionally left largely blank in the roadmap, as actions would be defined according to monitoring and review work. As such, this stage would involve monitoring the policy effectiveness and ongoing review of policy design. Policy specifics may be amended based on findings or supporting measures introduced. In some cases, the policy scope may be extended over time.

#### KEY ACTIONS:

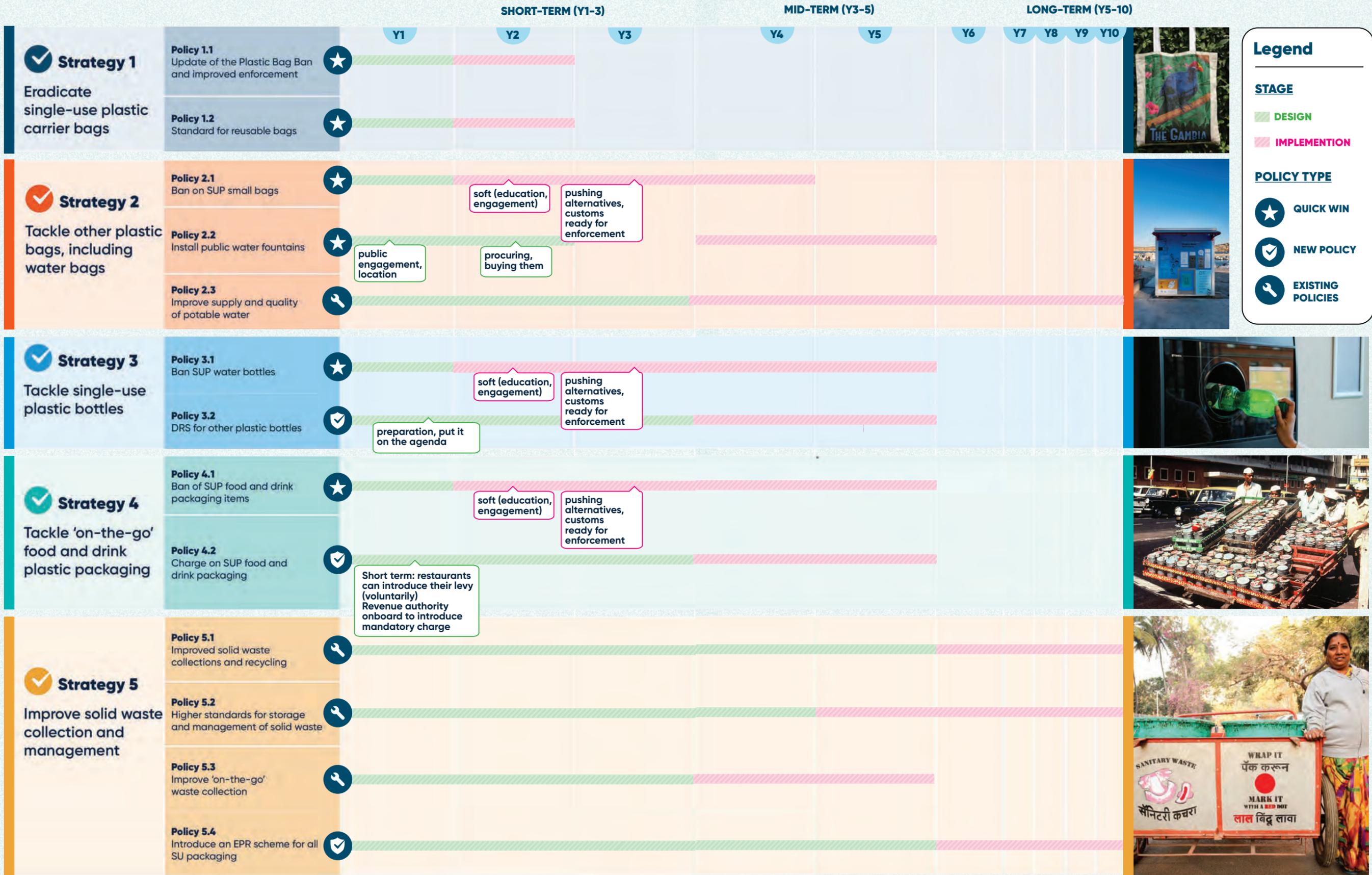
- Introduction of EPR scheme
- Implementation of improved solid waste management
- Monitoring policy effectiveness
- Policy specifics amended

Images: © Plastic Recycling Gambia



Image: © Unsplash

# The Roadmap



## Legend

### STAGE

- DESIGN
- IMPLEMENTATION

### POLICY TYPE

- QUICK WIN
- NEW POLICY
- EXISTING POLICIES

## Institutional Arrangements to Implement

### Summary of Governance/Key roles to implement

#### Clear leadership and ownership of the National Action Plan will be critical for its successful delivery.

The National Environment Agency (NEA) will have overall responsibility for leading the implementation of the National Action Plan. The issue of plastic pollution cuts across government so it will be important that other key ministries and agencies, including the Ministry of Environment, Climate Change and Natural Resources (MECCNAR), are also actively engaged in the delivery of the action plan.

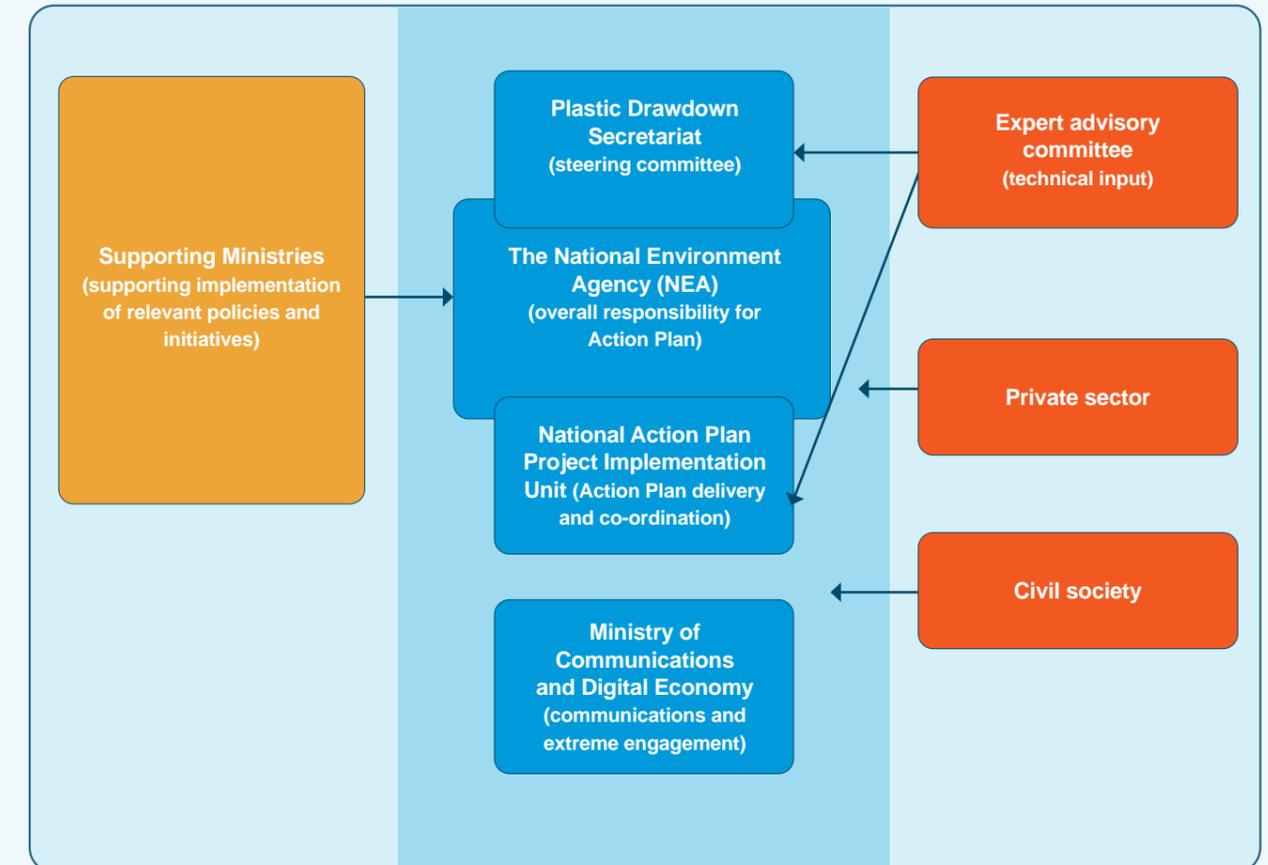
The steering committee for the NAP will include key stakeholders concerned by plastic pollution, including the representatives from the civil society, municipalities, the private sector, and all tiers of government, including the police and customs authorities. The NEA is the regulatory body for waste management and is also responsible for the enforcement of the laws and policies related to the matter. It takes the lead role in setting environmental quality standards in consultation with government departments and agencies. Part of the NEA's mandate is also to promote public awareness and to investigate and prosecute infringements relating to environmental quality, so it is well-placed to provide oversight and input into the National Action Plan's implementation. The NEA will serve as the main group of individuals who will review key outputs and decisions associated with the delivery of the National Action Plan, including the approval of the National Action Plan once it has been finalised. The Project Drawdown Steering Committee should also replace the existing Plastic Committee, whose mandate is limited to plastic bags.

A National Action Plan Project Implementation Unit (PIU), sitting within the National Environment Agency (NEA), will be formed to deliver and co-ordinate the implementation of the National Action Plan. The PIU will have three main roles:

1. Providing the secretariat for the NEA, with respect to the National Action Plan. This will involve scheduling and organising meetings, and preparing and distributing documents, etcetera.
2. Coordinating and managing all the activities that will be necessary to implement the National Action Plan, such as commissioning feasibility studies, implementing pilot and demonstration projects, etcetera.
3. Monitoring and evaluating (M&E) the implementation of the National Action Plan in accordance with the M&E plan (see below).

Figure 24 illustrates the overall governance arrangements for implementing the National Action Plan. The table below summarises the key government stakeholders and their roles in delivering this.

Figure 24  
Summary of Governance Arrangements



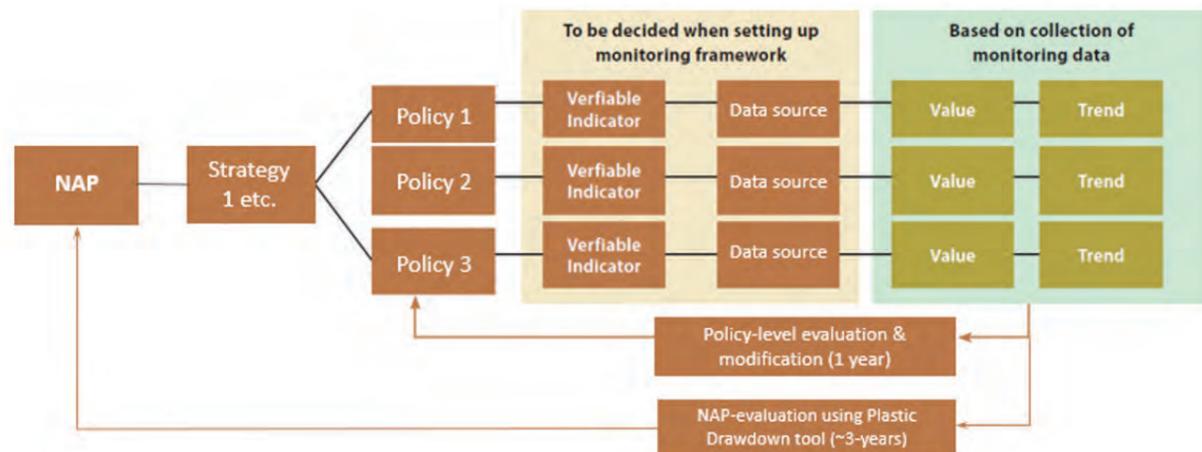
## Summary of government actors and their role in delivering the National Action Plan

Institution	Main roles and responsibilities in delivering NAP
<b>National Environment Agency</b>	<ul style="list-style-type: none"> <li>Overall responsibility for leading and coordinating the implementation of the National Action Plan.</li> <li>Regulatory enforcement related to DRS, bans on specific items and tackling litter.</li> <li>Helping to address issues associated with wastewater flows, particularly in terms of flushed microplastic items and microplastic emissions.</li> </ul>
<b>The Ministry of Environment Climate Change and Natural Resources (MECCNAR)</b>	<ul style="list-style-type: none"> <li>Providing policy guidance and supporting the implementation of the National Action Plan.</li> </ul>
<b>National Action Plan Project Implementation Unit, MECCNAR</b>	<ul style="list-style-type: none"> <li>Providing the secretariat for the NEA, with respect to the National Action Plan. This will involve scheduling and organising meetings, and preparing and distributing documents, etc.</li> <li>Coordinating and managing all the activities that will be necessary to implement the National Action Plan, such as commissioning feasibility studies, implementing pilot and demonstration projects, etc.</li> <li>Monitoring and evaluating (M&amp;E) the implementation of the plan in accordance with the M&amp;E plan (see below).</li> </ul>
<b>Ministry of Finance and Economic Affairs (MoFEA)</b>	<ul style="list-style-type: none"> <li>Helping design and facilitate financial incentives and instruments that form part of the National Action plan.</li> <li>Managing revenue flows related to new financial incentives.</li> </ul>
<b>Ministry of Transport, Works and Infrastructure</b>	<ul style="list-style-type: none"> <li>Facilitating investment capital where needed to enhance service provision and infrastructure.</li> <li>Oversight of infrastructure development needed as part of the National Action Plan (e.g. improving landfill disposal capacity).</li> </ul>
<b>Ministry of Fisheries and Water Resources</b>	<ul style="list-style-type: none"> <li>Helping design policy and facilitate positive change particularly with respect to the fisheries sector.</li> </ul>

Institution	Main roles and responsibilities in delivering NAP
<b>National Water and Electricity Company (NAWEC) and Public Utility and Regulatory Authority (PURA)</b>	<ul style="list-style-type: none"> <li>Facilitating investment capital where needed to enhance service provision and infrastructure.</li> <li>Oversight of infrastructure development needed as part of the National Action Plan (e.g. water supply facilities).</li> </ul>
<b>Attorney General's Chambers and Ministry of Justice</b>	<ul style="list-style-type: none"> <li>Helping design and facilitate the legislative changes that will be needed to implement and enforce key parts of the National Action Plan.</li> <li>Conducting initial legislative review, a key first step of the National Action Plan.</li> </ul>
<b>Ministry of Tourism and Culture</b>	<ul style="list-style-type: none"> <li>Helping design policy and facilitate positive change particularly with respect to the tourism sector.</li> </ul>
<b>Ministry of Foreign Affairs, International Cooperation and Gambians Abroad</b>	<ul style="list-style-type: none"> <li>Key role with respect to the development of Global Treaty on plastics pollution, including representing The Gambia at the Intergovernmental Negotiating Committee (INC) meetings.</li> </ul>
<b>Ministry of Health</b>	<ul style="list-style-type: none"> <li>Key partner in aspects related to health, including helping assess and address any health concerns related to refill schemes.</li> </ul>
<b>Local Governments</b>	<ul style="list-style-type: none"> <li>Key in implementing downstream policies and initiatives (e.g. source separation of waste plastics to enable recycling)</li> </ul>
<b>Gambia Revenue Authority</b>	<ul style="list-style-type: none"> <li>A key role in designing and implementing financial and legislative instruments related to specific items (plastic beverage containers, etc).</li> </ul>
<b>Ministry of Communication and Digital Economy</b>	<ul style="list-style-type: none"> <li>Communicating the key actions and playing a leading role in supporting communication and behaviour change activities that form a major part of the National Action Plan.</li> </ul>
<b>Customs</b>	<ul style="list-style-type: none"> <li>A key role in helping design and implement policies, in particular bans and charges.</li> </ul>
<b>Police</b>	<ul style="list-style-type: none"> <li>A key role in helping design and implement policies, in particular bans and charges.</li> </ul>

# Monitoring & Evaluation

Figure 25



The National Environment Agency (NEA) will have overall responsibility for monitoring and evaluating the implementation of the National Action Plan. A detailed monitoring and evaluation (M&E) plan will be developed at the start of the National Action Plan implementation.

Key elements of the M&E plan will include:

- One or more indicators defined for each policy in the National Action Plan.
- Time-bound targets will be defined for each indicator.
- A programme of periodic reporting will be defined, including key review points and an identified body for review (e.g. Taskforce on Plastic Bag Ban)
- A data source will be defined for each indicator.
- Where appropriate, tasks required to collect data at key points in the M&E programme will be identified and the necessary resources will be planned and implemented by the PIU (e.g. periodic waste composition analysis).
- A full review of the Action Plan in Year Five.

The M&E plan will be developed and implemented by the **National Action Plan Project Implementation Unit (PIU)**. The PIU will collect and collate relevant data and report progress against identified indicators. This will necessitate engagement with a range of other stakeholders who will hold the necessary information and data to allow this M&E.

Key stakeholders and relevant data sources include: the Customs and Excise Department of The Gambia, which holds data on imports and production of key plastic products; the National Environment Agency, which collects data on waste management; and The Gambia Bureau of Statistics, which can provide wider contextual data, such a demographic information.

Periodic M&E reports will be prepared by the PIU and presented to the NEA.

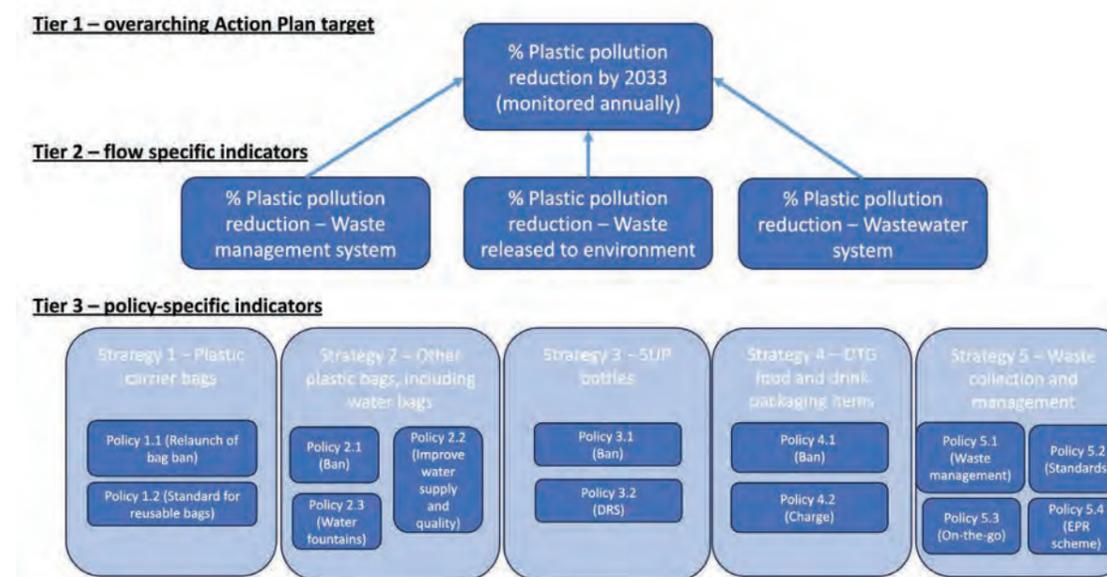
The indicators will comprise three tiers:

**Tier 1:** An overarching National Action Plan target in terms of reduction in plastic pollution compared to the forecast business as usual (BaU) case. This target will be assessed [annually] by using the Plastic Drawdown tool.

**Tier 2:** Indicators and targets for each of the three main flows of plastic pollution in The Gambia: 1) materials escaping from the waste management system, 2) direct releases into the environment in the form of littering and illegal dumping, and 3) plastics flushed into the wastewater system. These flows will be monitored using the Plastic Drawdown tool and will allow performance against the Tier 1 target to be estimated. Various data will be required to allow these indicators to be calculated (e.g. waste composition data, surveys of waste management behaviours, waste management system data, etc).

**Tier 3:** Indicators for each individual policy in the National Action Plan so that progress in implementing each policy and their associated impact can be assessed and reviewed.

Figure 26. Indicator Tiers



### The strategies and policies identified in the National Action Plan will require resourcing, technical support and investment over time.

A clear financing plan will be developed for each key policy, identifying needs in terms of coordination and technical capacity, and capital and operational finance. Existing capacity in the government departments and agencies that will be responsible for delivery of each element of the National Action Plan (see institutional arrangements above) will be assessed.

As well as considering existing and future government capacity, there are a range of sources of technical assistance and finance that can be used to help develop and implement the National Action Plan. These include:

- 1. Technical support from international agencies and NGOs:** This National Action Plan has been prepared with the support of the international social enterprise, Common Seas. We will continue to engage with Common Seas and other partners, such as the United Nations Environment Programme (UNEP), the World Bank (such as through their multi-lateral [Problue Fund](#)), the Global Environment Facility (GEF) (e.g. through their [Special Climate Change Fund \(SCCF\)](#) and [GEF Full-Sized Projects \(FSP\)](#)), and other international organisations that provide grants and aid for environmental conservation projects. This could help deliver new infrastructure, support with behaviour change campaigns and test new approaches to tackling single-use plastics in line with the objectives of this NAP.
- 2. Multilateral Development Banks (MDBs):** The Gambia could approach multilateral development banks such as the African Development Bank (AfDB) (such as through their [African Development Fund \(ADF\)](#), [Africa Climate Change Fund \(ACCF\)](#), or [Green Climate Fund \(GCF\)](#)) or the International Bank for Reconstruction and Development (IBRD) (e.g. [Climate Investment Funds \(CIFs\)](#) or [Program-for-Results \(PforR\) Financing](#)) for loans or grants specifically designated for environmental projects, including those aimed at addressing plastic pollution.
- 3. Climate Funds:** Climate funds, such as the [Green Climate Fund \(GCF\)](#) and the Adaptation Fund provide financial support to developing countries to address climate change-related challenges, including plastic pollution mitigation measures that contribute to environmental sustainability.
- 4. Collaboration with business and civil society:** There is real scope to collaborate with key business sectors in the Gambia, such as the tourism sector, to jointly deliver key elements of the National Action Plan. This will help to provide positive environmental outcomes and support businesses in addressing key corporate social responsibility aims.
- 5. Extended Producer Responsibility fees:** EPR has the potential to offer a basis for providing operational finance for improved waste management and recycling. The policy would provide a mechanism by which producers help to create operational finance for collecting and recycling the products they place on the market. This is a well-established approach used to help fund waste management and recycling in many parts of the world. The proposed deposit return scheme (DRS) for plastic bottles could potentially generate revenue from unclaimed deposits to fund waste management programs and support recycling initiatives. Please see Strategy 3 (policy 3.2) for more information.



Image: © State of Mic

#### 6. Upcoming financial support through UN Plastics treaty.

Actions covered under the 'medium' and 'long-term' roadmap of this NAP could be supported by financing through the upcoming UN Global Plastics Treaty. The Treaty is currently being negotiated, including means by which to support countries to meet obligations under the treaty (including developing and implementing NAPs).

The Gambia could also leverage other international agreements and conventions related to environmental protection, such as the [Basel Convention](#) or the [Stockholm Convention](#). While these international environmental treaties do not provide direct funding, they can indirectly support funding for projects related to their respective mandates through various channels, including:

- 1. Technical assistance and capacity building:** both conventions facilitate capacity-building activities and technical assistance for member countries to effectively implement their provisions. This could enhance the Gambia's ability to access funding from other sources, such as bilateral or multilateral aid agencies or private sector partnerships.

**2. Access to global environmental funds:** The Basel and Stockholm Convention can facilitate access to funding from global environmental funds, such as the [Global Environment Facility \(GEF\)](#).

**3. Partnerships and collaborative initiatives:** The conventions encourage collaboration among governments, international organisations, civil society, and the private sector. Through these partnerships and collaborative initiatives, funding opportunities may arise for projects related to the conventions.

### Effective dissemination of The Gambia's National Action Plan is essential for its success. The following key stakeholder groups should be engaged:

- **Citizens:** The public should be informed about the problem of plastic pollution, the government's response, and how they can play a role. Effective strategies include public engagement strategies across multiple channels, including traditional media and social media, engaging community and religious leaders, and education programmes in schools and universities. It will be important that measures that are being taken to alleviate the potential impact of change on poorer or more vulnerable members of the community (including waste pickers) are clearly identified and communicated.
- **Private sector:** Early, regular, and tailored communication will ensure the private sector can play its role in disseminating the plan to employees, customers, and suppliers, and in driving innovation towards a circular economy. The government should use a variety of communications channels, such as email, websites, social media, and face-to-face meetings. Industry associations can communicate to their members, but efforts should be made to reach all sizes and types of businesses.
- **NGOs and community-based organisations:** Often at the forefront of the fight against plastic pollution, they can help to raise awareness, support continued engagement with minority or at-risk groups, and help deliver solutions. Local partnerships and ongoing communications can ensure that the government benefits from their creativity, knowledge, and deep community connections.
- **Public sector:** The Ministry of Environment, Climate Change and Natural Resources will play a key role in strengthening communication links between government ministries, departments, statutory authorities, and municipal officials to ensure that they understand the importance of action, are clear on their role, and remain up to date as the plan is delivered.

Disseminating the plan regionally and internationally can also motivate other countries to deliver their own plans and help to develop best practices. This is particularly relevant as United Nations negotiations to develop a legally binding agreement on plastic pollution by 2024 continue, which are likely to include provisions on National Action Plans.



Image: © State of Mic



Image: © State of Mic



## Final remarks

**This national action plan sets in place a bold, optimistic vision for The Gambia to tackle plastic waste and pollution over the next decade. It sets out a positive roadmap for The Gambia in a world battling to create a more sustainable future.**

It provides the impetus for urgent action and highlights The Gambia's ambition to protect the environment and the health of its citizens as well as safeguard its blue economy – whilst supporting global efforts to deliver on the UN Sustainable Development Goals.

No single strategy can solve the problem, but this document demonstrates how implementing five strategies can reduce The Gambia's plastic pollution by 86%.

This also highlights the pressing need to catalyse global innovation and action, including through a robust United Nations Global Plastics Treaty. This will help tackle the 13% of pollution that remains, as well as the myriad impacts of legacy plastic pollution that are not addressed in this report.

This plan represents the combined efforts and knowledge of stakeholders across government, business, and civil society, alongside Common Seas' technical leadership and Plastic Drawdown tool. It is a plan that can help The Gambia to safeguard its magnificent biodiversity and tackle the issue of climate change.

The National Action Plan marks a profound milestone in the country's battle to end plastic pollution but demonstrates that this can only be achieved through immediate, on-going and coordinated action across all stakeholders – to deliver the policy framework, investment and behaviour change needed.

As such, this plan also represents the unwavering commitment of the people of The Gambia to the work ahead, and a common belief in a clean, fair, and prosperous future free from plastic pollution.

Image: © iStock

## Acknowledgements

We are grateful for the generous support of the International Union for the Conservation of Nature, who provided access to primary data from Plastic Waste Free Islands initiative, which was incorporated within the modelling analysis of this report.

The development of the NAP would not have been possible without the invaluable support provided by:

### NAP Steering Committee

Office of the President,  
State House, Banjul

Ministry of Environment,  
Climate Change and Natural  
Resources

Select committee on  
Environment – National  
Assembly

Ministry of Health

Ministry of Agriculture

Ministry of Trade, Industry,  
Regional Integration, and  
Employment

Ministry of Justice

Ministry of Higher  
Education, Research  
Science and Technology

National Disaster  
Management Agency

The Gambia Ports Authority

Department of Community  
Development

The Gambia Police Force

The Gambia Revenue  
Authority

Food safety and Quality  
Authority

### Media Council

The Gambia Chamber of  
Commerce and Industry

Banjul City Council

Kanifing Municipal Council

Mansakonko Area Council

Kerewan Area Council

Basse Area Council

Janjangbureh Area Council

Kuntaur Area Council

Brikama Area Council

Women Initiative Gambia

Precious Plastic Gambia

### Expert Panel

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### Wider Consultees

**Dodou Jallow** – Kanifing Municipal Council

**Bakary Jadama** – Brikama Area Council

**Omar BJ Touray** – Banjul City Council

**Alieu Sowe** – Plastic Recycling Gambia

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**Rebecca Talbot** – Precious Plastics  
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**Sukai Cham** – TARUD

**Ebrima Bah** – Bund Road dumpsite

**Alhagie Manneh** – UAid Foundation

**Ousman Manneh** – UAid Foundation

**Fatou Banja** – UAid Foundation

**Khan Mustapha Kanyi** - Bakoteh dumpsite

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### Acronyms

**ADLFG:** Abandoned, Lost or Otherwise Discarded Fishing Gear

**BAU:** Business as usual

**DRS:** Deposit Return System

**ECOWAS:** Economic Community of West African States

**EPR:** Extended Producer Responsibility

**EPS:** Expanded Polystyrene

**GBA:** Greater Banjul Area

**GHG:** Greenhouse gas

**HDPE:** high-density polyethylene

**KT:** kilotonne

**LDC:** Least Developed Countries

**MECCNAR:** Ministry of Environment, Climate Change and Natural Resources

**NAP:** National Action Plan

**NEA:** National Environment Agency

**NGO:** non-governmental organization

**PET:** polyethylene terephthalate

**PIU:** (National Action Plan) Project Implementation Unit

**PRO(s):** producer responsibility organization(s)

**PS:** polystyrene

**PVC:** polyvinyl chloride

**SDG:** Sustainable Development Goals

**SIDS:** Small Island Developing States

**SUP(s):** single-use plastic(s)

**TARUD:** Trust Agency for Rural Development

**WACA:** West Africa Coastal Areas Management Program

**WAEMU:** West African Economic and Monetary Union

### Definitions

**Biodegradable materials:** a material that can, with the help of microorganisms, break down into natural components (e.g. water, carbon dioxide or biomass) under certain conditions (Law Insider)

**Blue economy:** the Blue Economy is a sustainable use of ocean resources for economic growth, improved livelihoods and jobs, while preserving the health of marine and coastal ecosystems. The Blue Economy encompasses many activities that impact all of us. (The World Bank, 2017)

**Circular economy:** an economic model, in which products and materials are designed in such a way that they can be reused, remanufactured, recycled or recovered and thus maintained in the economy for as long as possible, along with the resources of which they are made, and the generation of waste is avoided or minimized, and greenhouse gas emissions are prevented or reduced (UN Environment 2023)

**Composite materials/product packaging:** packaging made of two or more layers of different materials which cannot be separated by hand and form a single integral unit (Law Insider)

**Deposit Return System (DRS):** a policy which requires producers and retailers to place a refundable deposit on certain product packaging. The deposit is refunded to the consumer upon return of the empty packaging, so it can be reused or recycled. (Tomra, 2023)

**Fee modulation:** the fee paid by the producer under EPR, for each piece of packaging put on the market, can be modulated by criteria and methodology (The Consumer Goods Forum, 2022)

**Advanced fee modulation:** modulation under EPR using criteria beyond weight or product type. It can include bonuses and maluses (reductions or increases of the fee), and premiums and penalties, which are financial incentives paid independently from the fee (Laubinger et al. 2021)

**Extended producer responsibility (EPR):** responsibility of a producer for the environmentally sound management of the product until the end of its life (Daily updates, 2021)

**Illegal Dumping :** illegal disposal of large items or waste on public roads, land or into rivers (Metropolitan police, 2023)

**Littering:** illegal dumping of waste often associated with eating and drinking (Cambridge dictionary, 2023)

**Microplastics:** primary microplastics are originally produced or directly released into the environment as micro-sized particles (less than 5 millimeters in size). Secondary microplastics are micro-sized fragments originating from the degradation of large plastic waste into smaller plastic fragments once exposed to the environment

**Refill:** consumer bringing their own container into shops, cafes, etc. to fill with products at their disposal (Nature World News, 2023)

**Plastic Drawdown:** peer-reviewed and UN-endorsed methodology for supporting governments to understand their country's plastic pollution problem and take ambitious policy action to address it. The tool was developed by Common Seas, in collaboration with Oxford University and Eunomia Research and Consulting (Royle et al. 2021)

**Petrochemical:** obtained by the refining and processing of petroleum or natural gas (World encyclopedia, 2023)

**Recyclable:** for something to be deemed recyclable, the system must be in place for it to be collected, sorted, reprocessed, and manufactured back into a new product or packaging—at scale and economically. Recyclable is used here as a short hand for 'mechanically recyclable (WM, 2023)

**Recycled:** processed waste materials for the original purpose or for other purposes, excluding energy recovery (ISO:472:2013) (Textile exchange, 2021)

**Residual waste:** the fraction of waste that is neither recycled nor composted (European Environment Agency, 2022)

**Reuse:** means use of a product, more than once, in its original form (ISO:472:2013). In the context of packaging reuse, reuse is a system under which the packaging's collection, washing, refill and redistribution is operated by the producer and/or a third party, including the existence of infrastructure and reverse logistics, incentive to return, collection rate and minimum rotations (Reusable Packaging association, 2021)

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## Appendices

### Regional agreements

The Gambia ratified the Bamako Convention on the ban of the import into Africa, and the control of transboundary movement and management of, hazardous waste within Africa, including plastic waste (but not all plastics). The Bamako Convention came into force in 1998 in response to the inability of the Basel Convention to ban trade in hazardous waste to the least developed countries (LDCs); and the realization that many developed countries were exporting toxic waste to Africa (Koko affair in Nigeria, Probo Koala affair in Côte d'Ivoire). However, the implementation of the Bamako Convention on the continent is slow. The Gambian authorities, through the National Environment Agency, trained border security officers on illegal movement of chemicals and waste in 2022. However, the training needs to be harmonised within the neighbouring countries to ensure strong law enforcement.

To address the issues of microplastics and marine plastic pollution in the sub-region, more regional cooperation is needed, particularly in the case of neighbouring Senegal. The ban of SUP water bags in Senegal has been delayed since the COVID-19 pandemic, and these sachets leak into The Gambia as the border is porous. Both countries need to achieve equal measures to implement plastic bans and engage the private sector in both countries. To face the problems caused by plastic waste on the coastline, the West African countries launched in 2018 the West Africa Coastal Areas Management Programme (WACA). The programme is managed by the World Bank, and stimulates knowledge transfer, promotes policy dialogue between countries and mobilizes public and private funding to combat coastal erosion, flooding, pollution and climate change adaptation in order to restore and protect the economic, social and ecological assets of coastal zones.

The WACA program has already started assessing the economic and environmental impact of plastic pollution in the West African region. The assessment studies will also explore the advantages of shifting to a circular economy to tackle the plastic pollution. This initiative will enable The Gambia to better manage plastic waste, not only on its 80 km ocean coastline, but also on the 200 km inland river coastline.

The Gambia is one of the 15 member countries of ECOWAS (Economic Community of West African States), which has an environmental policy and a regional climate strategy since 2022. ECOWAS and WAEMU (West African Economic and Monetary Union) have begun working together to develop a regional strategy for sustainable plastic waste management and a Regional Regulation on Plastics Management has been drafted. The World Bank is supporting those institutions for the preparation of a background document towards a West Africa Regional Action Plan on Plastics Management and Circular Economy. The Regional Action Plan will be a tool to help the different stakeholders address the challenge of plastic pollution in the region.

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National Action Plan to End Plastic Pollution in The Gambia, April 2024

STRATEGY	POLICY/ ACTIONS	ACTIVITY	COST ESTIMATES (GMD)*		
			GMD	USD	
<b>1 - Eradicate single-use plastic carrier bags</b>	1.1: Update of the existing plastic carrier bag ban, through education and engagement campaigns, and improved enforcement	Conduct review and update of the Ban on Plastic Bags Order 2015.	2,040,000.00	30,000	
		Popularization of the updated Ban Order.	10,234,000.00	150,500	
		Promote environmentally friendly bags and provide incentives.	13,600,000.00	200,000	
	1.2: Develop a standard for reusable bags, plus launch a design competition for a 'reusable bags for The Gambia'	Conduct study on existing international standards for reusable bags, as well as a midterm assessment of materials' durability, and environmental impact.	3,414,008.00	50,206	
		Consult with key stakeholders to draft a national standard for reusable bags.	1,704,012.00	25,059	
		Call for proposal on designs for reusable bags.	34,000,000.00	500,000	
		Develop guidelines and technical specifications for reusable bags in The Gambia.	3,088,016.00	45,412	
	<b>2 - Tackle other plastic bags, including water bags</b>	2.1: Ban on small single-use plastic bags	Enforcement of the ban on plastic order, (import, wholesale, retail, and use).	44,020,004.00	647,353
			Public awareness and education campaign.	7,168,016.00	105,412
			Promotion of incentives to businesses and consumers who use sustainable alternatives.	10,208,024.00	150,118
2.2: Installing public water fountains		Scouting for strategic locations for the fountains, Designing, Installation and Maintenance of Fountains.	6,800,000.00	100,000	
		Community engagement/ awareness creation on the use of the public fountains.	4,904,024.00	72,118	

\*Preliminary estimates produced by the NEA

STRATEGY	POLICY/ ACTIONS	ACTIVITY	COST ESTIMATES (GMD)	
			GMD	USD
	2.3: Improving the supply and quality of portable water	Installation of water filters in public places, offices and other businesses.	6,080,016.00	89,412
		Strengthen the NEA/DWR laboratory for water quality analysis and reporting.	25,500,000.00	375,000
	<b>3 - Tackle single-use plastic bottles</b>	3.1: Phased ban on single use plastic beverage bottles	Enforcement.	17,028,016.00
Training of custom officers and officials working at point of entry.			8,500,000.00	125,000
Conduct public awareness campaigns.			15,199,972.00	223,529
3.2: DRS for all other plastic bottles		Design and implement a comprehensive Deposit Return System.	4,896,000.00	72,000
		Establish and promote deposit infrastructure.	3,400,000.00	50,000
		Engage the importers and retailers in the implementation of the DRS.	1,500,012.00	22,059
<b>4 - Tackle 'on-the-go' food and drink plastic packaging</b>	4.1: Ban of selected SUP food and drink packaging items	Conduct a baseline and midterm Assessment of the potential impact of the Ban.	5,100,000.00	75,000
		Support provision of alternatives of selected SUP packaging.	25,535,972.00	375,529
		Awareness creation/raising.	7,140,000.00	105,000
	4.2: Introduce a charge on those SUP food and drink packaging items that are not banned	Consultative meeting and awareness with business personnels and handlers of exempted plastic products.	3,452,020.00	50,765
		Develop a strategy with a grace period to implement the charges.	1,500,012.00	22,059
		Strengthen enforcement of the regulatory authorities (institutional strengthening).	21,999,972.00	323,529

## Appendices

STRATEGY	POLICY/ ACTIONS	ACTIVITY	COST ESTIMATES (GMD)	
			GMD	USD
<b>5 - Improve solid waste collection and management</b>	5.1: Improve solid waste collections and recycling	Support local government councils to upgrade and expand waste collection infrastructure.	22,140,052.00	325,589
		Introduce waste segregation systems at household level and at strategic public places.	34,000,000.00	500,000
		Support to strengthen the existing waste recycling plants across the country (circular economy) 'waste to resource'.	35,350,004.00	519,853
	5.2: Higher standards for storage and management of solid waste	Prepare a waste storage and management guidelines.	1,500,012.00	22,059
		Assessment of existing solid waste management facilities.	3,419,992.00	50,294
		Popularization of the guidelines to be adopted at all levels.	4,080,000.00	60,000
		Capacity building of staff, waste managers and producers on standards and best practice.	10,204,012.00	150,059
	5.3: Improve 'on-the-go' waste collection (key supporting policy)	Develop or review policy 'on the go' waste collection.	2,500,020.00	36,765
		Create/improve awareness on the policy.	3,448,008.00	50,706
	5.4: Introduce an EPR scheme for all SU packaging	Develop and implement Extended Producer Responsibility (EPR) Regulation.	2,380,000.00	35,000
		Study tour on the implementation of the Extended Producer Responsibility Regulation.	6,800,000.00	100,000
		Engage and educate producers/importers.	2,380,000.00	35,000
		Create public awareness campaigns.	3,400,000.00	50,000
		Monitoring and Evaluation.	4,999,972.00	73,529
		Review of the Action Plan.	1,500,012.00	22,059
	<b>TOTAL ESTIMATED COST</b>			<b>426,114,180.00</b>





# National Action Plan to End Plastic Pollution in The Gambia

October 2024