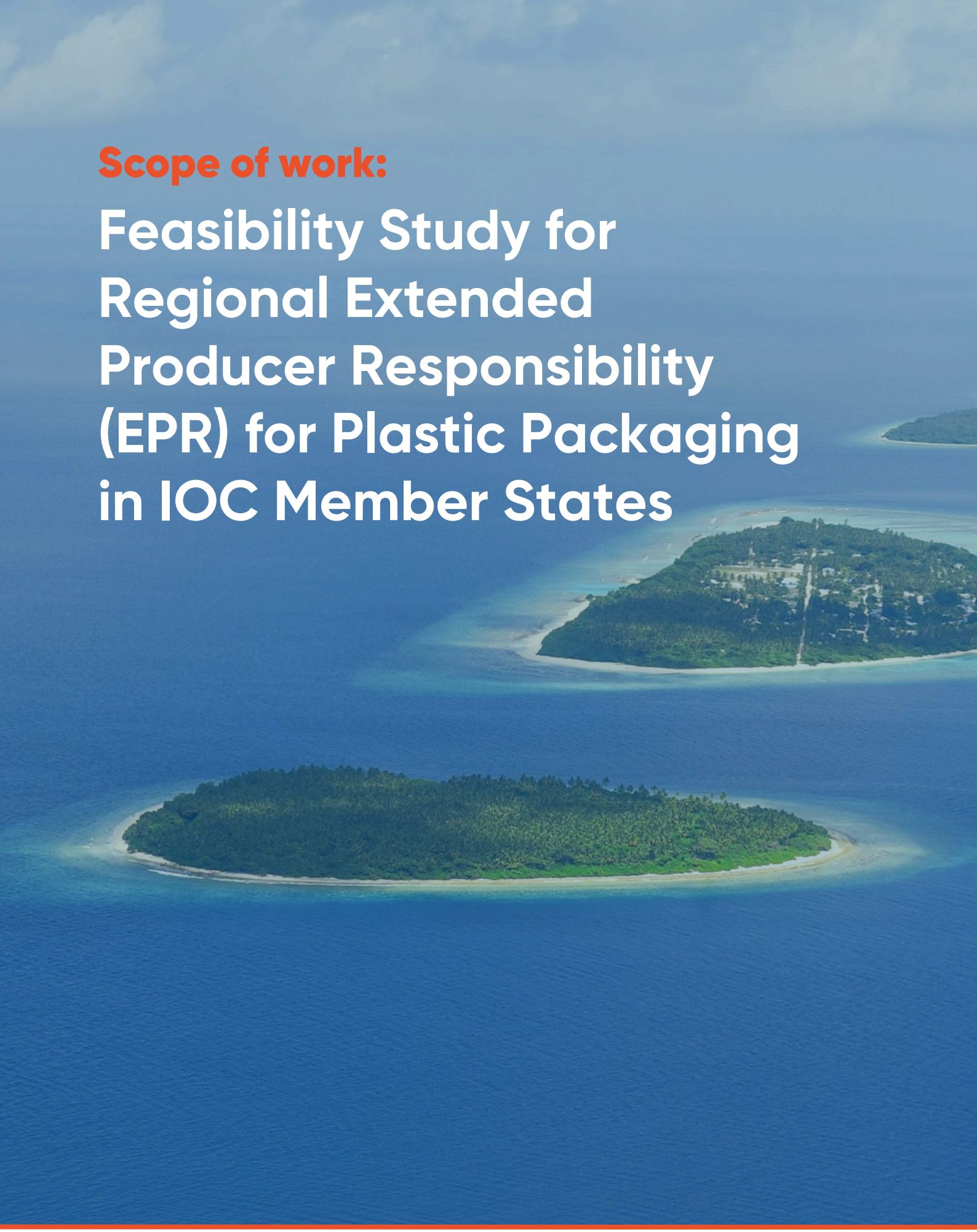

Scope of work:

Feasibility Study for Regional Extended Producer Responsibility (EPR) for Plastic Packaging in IOC Member States

INDIAN OCEAN COMMISSION

Common Seas

Circulearth

Executive summary

Plastic pollution represents a critical and growing environmental and economic challenge in the Indian Ocean region, with an estimated 15% of global oceanic plastic waste entering the basin annually.[1] The impacts are particularly severe for Small Island Developing States (SIDS), including the Member States of the Indian Ocean Commission (IOC)—Mauritius, Madagascar, Seychelles, La Réunion, and Comoros (hereafter the IOC Member States)—where geographic isolation, limited economies of scale, high transport costs, and constrained waste management systems exacerbate the issue.

In response, the IOC was mandated by its Member States in 2023 to accelerate the transition to a regional circular economy, including through the development of Extended Producer Responsibility (EPR). Building on this mandate, this Scoping Report is part of a broader partnership with Common Seas – author of the Regional EPR for SIDS and Remote Geographies Research Report (2025)[2]-to advance a regional EPR framework for plastic packaging.

This scoping report recommends the scope, objectives, and methodological approach for a regional EPR feasibility study; a necessary step to provide a structured, evidence-based technical and economic foundation that allows the IOC Member States to transition from conceptual alignment to a functional, transboundary EPR system for plastic packaging. The feasibility study should be strategically aligned with the next steps outlined in the IOC's "*Next Steps of EPR for the Island States of the Indian Ocean*" report, ensuring coherence with the proposed six-part regional strategy, including assessment of national waste systems, mapping of recycling and export opportunities and enhancing maritime cooperation. This scoping report also identifies the resource requirements for a comprehensive feasibility study and aims to serve as supporting material to mobilise the necessary funds.

Stakeholder consultations confirm broad support for a regional approach, while also highlighting key challenges. These include significant data gaps, limited technical capacity, fragmented regulatory frameworks, and operational barriers such as inadequate infrastructure and weak maritime connectivity. Importantly, stakeholders emphasised that governance, legal alignment, and data harmonisation are priority enablers for success, ahead of infrastructure investments. Private sector engagement was also identified as critical.

The feasibility study should assess the viability of the technical, legal, financial, and institutional requirements of a regional EPR system. This includes assessing the scope of packaging and sectors covered; evaluating options for regional governance and scheme administration; analysing operational flows, infrastructure needs, and end markets; and sustainable financing mechanisms based on producer responsibility. It should also address cross-cutting issues such as data harmonisation (including customs code alignment), social inclusion, and regional cooperation on waste trade and standards.

The study should be implemented through a structured methodology combining data collection and analysis, stakeholder engagement, and targeted technical assessments, supported by a multi-level governance framework involving the IOC, actors from existing regional projects (e.g. ExPLOI, IslandPlas and UNDP ISLANDS Indian Ocean Regional

[1] Pattiaratchi, C., van der Mheen, M., Schlundt, C., Narayanaswamy, B. E., Sivanane, A., de Vos, A., et al. (2022). Plastics in the Indian Ocean – sources, transport, distribution, and impacts. *Ocean Science*, 18(1), 1–28. https://doi.org/10.5194/os-18-1-2022

[2] Common Seas. (2025). Regional EPR: A potential solution to reduce plastic pollution in SIDS and Remote Geographies. https://commonseas.com/wp-content/uploads/2025/11/201125_Regional-EPR-Research-Report_Final.pdf

Project), national authorities, and private sector actors. An estimated budget of between £150,000-£250,000 is needed to conduct the feasibility study and will require resource mobilisation. Additional funding will also be required to advance from feasibility to system design and implementation, including legislative drafting, infrastructure design, digital systems, and pilot projects.

Ultimately, the feasibility study should aim to deliver a technical and economic analysis at the individual Member State level, evaluating the feasibility and high-level parameters required for regional cooperation on EPR. By addressing systemic fragmentation and leveraging regional cooperation, the initiative has the potential to significantly improve waste management outcomes, reduce plastic pollution, and support the transition to a resilient circular economy across the IOC Member States.

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1. Introduction and objectives

Plastic pollution is a growing environmental and economic challenge in the Indian Ocean region. Half of the world's top ten contributors to ocean plastic pollution are located along the Indian Ocean rim, and an estimated 15 % of global oceanic plastic waste—between 0.47 million and 2.75 million tonnes of macroplastics annually—enters the Indian Ocean basin.[3]

These challenges are particularly acute for Small Island Developing States (SIDS), including the five member states of the Indian Ocean Commission (IOC)—Mauritius, Madagascar, Seychelles, La Réunion and Comoros (hereafter the IOC Member States). Geographic isolation, low economies of scale, high transport costs, limited access to end markets, and the influx of legacy plastics from distant sources exacerbate local waste management challenges. In many cases, inadequate disposal, sorting and recovery systems further increase vulnerability to rising waste generation and environmental degradation.

In September 2023, the IOC was mandated by its member states to mobilise partnerships and resources to accelerate the transition to a circular economy at the regional level, including through Extended Producer Responsibility (EPR) for packaging and tyre value chains. The partnership between IOC and Common Seas intends to advance this mandate, building on recent research led by Common Seas, in collaboration with Circulearth, the Global Plastics Policy Centre, Africa Circular, WRAP and ANZPAC, and advised by GIZ and the UNEP Cartagena Convention. The research explores the benefits and design considerations of a regional approach to EPR for SIDS.

With the overarching long-term goal of supporting the IOC to establish a coordinated regional EPR system to significantly reduce plastic pollution across its Member States, a critical short-term priority is the development of a comprehensive feasibility study. This technical study will provide a robust evidence base to assess the viability of the legal, operational, financial, and governance mechanisms required to implement a regional EPR scheme for plastic packaging.

This scoping document outlines the proposed scope, objectives, and methodological approach for the feasibility study for a regional EPR scheme for plastic packaging, as well as indicative resource requirements for its implementation. Although the IOC's 2023 mandate also encompasses tyres, their distinct technical, logistical, and material recovery processes warrant a separate, dedicated work stream.

This scoping report builds on a regional scoping workshop held in November 2025, preparatory background research on waste management systems across the five member states (see Annexes II and III), and eight targeted interviews conducted between February and March 2026 with EPR Working Committee members, National Focal Points, public-private platform representatives, private sector actors, and regulatory and enforcement authorities (see Annex I). These consultations were essential to identify the specific socio-economic barriers and opportunities unique to each Member State, ensuring the regional framework is grounded in local reality.

[3] Ibid

2. The regional value proposition

EPR is widely recognised as the only proven way to sustainably fund the collection, sorting, and recycling of single-use plastic packaging, shifting costs from governments to producers. Despite 400+ EPR schemes globally, very few SIDS have fully integrated these frameworks into their regulatory landscapes.[4] Additionally, SIDS face unique challenges – including low economies of scale, lack of access to end markets, limited local bargaining power and low-capacity governments - that may require an adapted approach to EPR.

To address these challenges, the feasibility study should assess whether the following four pillars can be effectively achieved under a regional EPR scheme, treating them as practical mechanisms to be tested and validated:

- **Achieving economies of scale and logistical connectivity:** the study should focus on resolving structural "missing links" in maritime transport, as identified by the ExPLOI project. In particular, it will assess the feasibility of transporting materials between islands (for example, from Seychelles to processing facilities in Madagascar) and evaluate the role of aggregation hubs in making collection from remote areas more cost-effective.

- **Securing access to end markets:** moving beyond a reliance on exports, the study should assess the viability of the 2020 Cap Business Océan Indien (CBOI) study's proposal for a regional PET recycling facility, measuring success by whether a stable, predictable, and sufficiently large regional material stream can be established to support local circularity under a regional EPR scheme.

- **Reducing public sector burden through institutional strengthening:** the framework should use established regional successes—such as the Seychelles' DRS which achieves a 90% return rate—as a technical blueprint. It should evaluate whether regional cooperation can help to solve unreliable data baselines in countries like Comoros (see Annex I) and whether a PRO model and cooperation between regional PROs can help to provide structured financial certainty.

- **Strengthening bargaining power for brand accountability:** the study should assess the feasibility of using collective regional engagement with multinational brands to achieve harmonised design standards – which is currently a national challenge. It will evaluate whether a regional approach can overcome the limitations of national-only measures—such as the Mauritius excise duty (which saw only 7% reallocation to the sector)—and determine if regionally coordinated fee structures can be effectively ring-fenced for infrastructure while ensuring brands are held accountable for their plastic footprint across all Member States.

[4] Earth Action. (2025). *Shift into gear – how businesses can prepare for the era of global plastic regulation.* Retrieved from https://www.e-a.earth/wp-content/uploads/2025/03/EASAP-Report-HD.pdf

2.1 Synthesis of stakeholder insights

Stakeholder insights captured during the November 2025 scoping workshop and the subsequent targeted interview phase from February–March 2026 provide a comprehensive diagnostic of the region's readiness for a transboundary EPR framework.

While the quantitative data establishes a baseline of expectations, the qualitative interviews with national stakeholders provide critical insight into the challenges and opportunities that the feasibility study will need to evaluate:

- **Technical literacy and capacity gaps:** while the vast majority of workshop participants reported having a working knowledge of EPR, there is a pronounced drop-off in those comfortable with its actual implementation mechanics. The interview phase confirmed this disparity, particularly in nations currently lacking a formal legal basis for EPR (e.g., Comoros and Madagascar).

- **Strategic sentiment:** when asked what the main advantages of a regional EPR system could be, the prevailing responses included scale, collaboration, and innovation, confirming the appetite for regional cooperation. However, interviewees frequently balanced this optimism with concerns regarding complexity and regulatory obstacles. This suggests that stakeholders view the project through a "high-reward, high-effort" lens, where the perceived value of a regional scheme is weighed against the administrative challenges of cross-border alignment.

- **Value drivers:** there was a distinct prioritisation of "soft infrastructure"—specifically knowledge sharing and regulatory harmonisation—over immediate investment in physical processing facilities. This indicates a collective "policy-first" preference; stakeholders want a regional foundation that creates legal certainty before committing to hard infrastructure. This sentiment was echoed by private sector actors in Mauritius and Seychelles, who explicitly called for harmonised "rules of the game" as a condition for regional investment.

- **Institutional prerequisites:** The hierarchy of needs is led by governance and institutional capacity and legal alignment. Financial sustainability, while critical, is viewed by stakeholders across both the workshop and interview phases as an operational output of successful governance rather than a standalone entry point. The consensus is clear: without a robust institutional "anchor," financial mechanisms alone will not achieve regional scale.

The scoping phase revealed a high level of engagement tempered by significant structural disparities. The following matrix synthesises the findings from 8 targeted interviews and supporting regional surveys.

Table 1. Key findings from stakeholder interviews

Pillar	Key findings and stakeholder sentiment
Governance and mandate	Mauritius is currently drafting a Circular Economy law following its National Plastic Roadmap which is due to be published this year, while Seychelles operates a mature system with a functional DRS since 2007. In Madagascar, despite the launch of GADEM (Ecological Actor Grouping) in 2025, the political landscape remains "complex" - the Ministry is currently working on a national roadmap on circular economy with the financial support of the African Development Bank group. Stakeholders indicate that "resistance of economic actors" is the dominant obstacle to implementing policies across the region.
Operational realities	A critical operational barrier is the lack of viable maritime routes; for instance, Madagascar has the industrial capacity to process PET from Seychelles, but no direct shipping route exists. In Mauritius, the voluntary EPR on PET and HDPE is failing, with collection rates expected to drop from 44% to 25% due to withdrawn subsidies. Seychelles' DRS includes four redemption centres and 2 recycling centres under the control and management of the waste agency LWMA – but it continues to rely on exporting flakes to distant markets like India and Europe.
Data and transparency	A data gap exists across the basin; even in mature systems, there is a massive "missing delta" between imported resins and recorded plastic waste. Data in Comoros remains "unreliable," necessitating legal and financial experts to build a formal database. Customs authorities from Comoros and La Réunion confirmed that current HS Codes do not distinguish between "content" and "container," hindering accurate mapping of plastic import/export volumes.
Financial and incentives	Mauritius is transitioning from a mandatory PET tax system—which currently imposes an excise duty but has seen only a 7–10% reallocation to the sector—toward a potential combination of EPR and DRS to improve financial efficiency. While local producers like Phoenix Bev and QBV are required to pay the tax, their support for collection is on a voluntary basis and collection performance has significantly declined from 44% in 2022 to 25% in 2024 (5,088 tons). Notably, HDPE remains entirely unregulated by public authorities, relying instead on voluntary, industry-funded initiatives from players like Sofap and Morilait targeting the HORECA sector. In Madagascar, the private sector remains distrustful of public subsidy management, preferring tax exemptions on equipment over a formal EPR fee system, while emphasising the need for eco-modulation to penalize non-recyclable materials. A feasibility study is currently underway for the construction of an rPET plant in Réunion (though latest reports suggest this may be relocated to Mauritius due to production costs). This is being funded by ADEME Réunion.

3. Feasibility Study Scope

This section defines the recommended parameters of the feasibility study. Importantly, the study is conceived as a bottom-up diagnostic, with the primary objective of delivering technical and economic analysis at the individual Member State level, assessing how regional cooperation can effectively support, and not supplant, ongoing national efforts. The study is not intended to extend to the detailed design of the scheme itself but should instead focus on evaluating the feasibility and high-level parameters required for regional cooperation. It should also be strategically aligned with the next steps outlined in the "*Next Steps of EPR for the Island States of the Indian Ocean"* report, ensuring coherence with the proposed six-part regional strategy, including assessment of national waste systems, mapping of recycling and export opportunities and enhancing maritime cooperation.

3.1 Key feasibility questions

For each scope dimension, the study should systematically identify and evaluate available options, considering technical, economic, institutional, and social constraints. The aim is to determine whether, and under what conditions, a regional model can deliver the desired efficiencies while remaining aligned with on-the-ground operational realities. The study's key scope dimensions, along with the questions it must address to assess the feasibility of a regional EPR scheme, are summarized in Table 2.

Table 2. Summary of the feasibility study scope & key feasibility questions to be answered

Scope dimension	Minimum requirements – feasibility questions
Packaging and sector scope	Is there a "critical mass" of materials? The study must identify a specific combination of polymers (e.g., PET/HDPE) and sectors (e.g., HORECA/Tourism) that generates enough volume to justify regional logistics without overwhelming initial administrative capacity.
Geographic and jurisdictional scope	Can the "4+1" divide be bridged? The study must determine if a single legal mechanism can simultaneously satisfy EU/French laws (La Réunion) and the emerging national laws of the other four states without creating a "double-taxation" or "no-man's land" scenario
Value chain actors scope	Is there a viable "obligated base"? The study must confirm that the number of identifiable producers and importers is large enough to sustain the system's costs through fees, and that waste operators have the capacity to scale up collection.
Legal and regulatory scope	Is the "transboundary path" legal? The study must confirm that national laws allow for regional cooperation and that the Basel Convention protocols can be streamlined for "waste-as-resource" movement between the islands.
Costs and business case scope	Does "regional" cost less than "national"? The study must prove that the per-unit cost of managing waste via regional aggregation is lower (or provides significantly higher environmental value) than five separate, uncoordinated national systems.
Operational and infrastructure scope	Can the "missing links" be built? The study must identify potential viable maritime/logistical routes that can move waste from supply islands to processing hubs at a good price.
Material flow scope	Can we see the "missing delta"? The study must establish a data protocol (likely via HS Code harmonisation) that allows all the 5 nations to track imports vs. waste with a margin of error low enough for financial auditing.
Social scope	Is "formalisation" economically viable? The study must determine if the PRO fee structure can afford to pay informal collectors a "service fee"

	(plus PPE/training) without making the total producer fee prohibitively expensive.
Regional cooperation and trade scope	Is there "sovereign buy-in" for material trading? The study must answer whether Member States are willing to allow other Member States or a regional entity to act as a sole trader/broker for their waste materials in international markets.
Institutional and governance scope	Who holds the money and the trust? The study must identify a governance model (IOC-led or independent) that all five nations trust to foster the regional cooperation of EPR implementation.

The approach should be comparative and evidence-based: options across packaging types, sector coverage, governance structures, and regional alignment should be evaluated for their practical feasibility, scalability, and compatibility with existing policies and capacities. Particular attention should be paid to the diversity of national contexts, including differences in regulatory maturity, infrastructure, and market conditions. By identifying the enabling conditions needed for both national effectiveness and regional coordination, the study can provide a practical assessment of feasibility and help ensure that any future regional framework is grounded in established national capacities.

Drawing on this structured assessment, the feasibility study should determine whether, and under which conditions, regional cooperation on EPR schemes would be viable. This includes evaluating potential configurations for legal, operational, financial, and governance elements, and clarifying the circumstances under which each could be successfully implemented. By mapping these enabling conditions for both short-term rollout and long-term adaptability, the study can ensure that any future system is able to evolve in step with improvements in infrastructure, data systems, and institutional capacity across the region.

3.2 Scope dimensions

Packaging and sector scope

While a multi-material approach (encompassing paper, glass, and metals) is standard in mature continental systems, this regional EPR scheme will initially focus exclusively on plastic packaging. This prioritisation reflects the disproportionate impact of plastic on the Indian Ocean's marine ecosystems and the specific logistical challenges associated with its high volume and low density.

The feasibility study should assess the types of plastic packaging to be included in the scheme. This will predominantly be driven by which plastic packaging is most commonly used and contributes significantly to the waste stream in the IOC Member States, as well as those that are readily recyclable or for which recycling infrastructure can be feasibly developed. The focus on plastic allows the study to define precise "fee-per-polymer" models without the added complexity of heavy material logistics (such as glass), which often possess distinct recycling economics and established, albeit informal, local trade routes.

Consideration should also be given to the types of plastic packaging already targeted by existing policies to avoid duplication of efforts and competition for materials, such as the Deposit Return Scheme for PET bottles in the Seychelles and potential reuse systems in La Réunion supported by the PRO Citeo.

The scheme should be designed for long-term scalability; if it is not practicable to include all plastic packaging from the outset of the scheme, it may be feasible to allow for phased expansion to additional packaging types or other material streams (e.g., aluminium or paper) as recycling technologies, compliance mechanisms, and producer capacities evolve.

The feasibility study should also assess which sectors the EPR scheme could cover, including for example, whether it will cover plastic packaging from households, the HORECA (hotel, restaurant, catering) sector, tourism, and fishing/aquaculture, which can be significant in SIDS contexts.

Geographic and jurisdictional alignment

The feasibility study should examine geographic and jurisdictional alignment across the region, including how to address the “two-speed” context created by the coexistence of EU-standard requirements in La Réunion (aligned with the anti-waste for Circular economy law, the EU Packaging and Packaging Waste Regulation and Citeo involvement as PRO) and the emerging regulatory frameworks of the other IOC Member States (e.g. upcoming publication of Mauritius National Plastic Roadmap; Comoros bill on EPR for July 2026; Madagascar feasibility work on EPR)

The study should also consider whether additional differentiation between countries is required, considering factors such as country size, institutional capacity, and waste generation and management characteristics.

A key decision point will be whether the scheme should be designed as a unified five-nation system or as a “4 + 1” model, with a distinct structure for La Réunion supported by specialised data-sharing and coordination mechanisms.

Value chain and actors scope

All of the key actors in the plastic packaging value chain should be covered by the study. This includes producers and importers (brand owners), retailers and distributors, waste management operators, informal sector collectors and recyclers, and end markets for the collected materials. Municipal and port authorities should also be considered due to their roles in supporting waste collection, logistics, and regulatory oversight. Ministries of environment, finance and national waste agencies should also be integrated. Understanding the interactions among these stakeholders is crucial for designing an effective EPR system.

Legal and regulatory scope

The study should assess the alignment of the EPR scheme with national and sub-national waste laws, as well as customs and import regulations, particularly the regional harmonization of HS Codes to distinguish between container and content. Enforcement capacity should also be evaluated to determine how effectively current laws and regulations are being implemented, and to identify whether capacity building is required in preparation for future EPR laws and regulations. Compatibility with existing policies such as bans and taxes should be evaluated, alongside the feasibility of enforcement across jurisdictions. The study should also consider compliance with international conventions and regulations, including the Basel Convention on transboundary waste movement and the EU Waste Shipment Regulation, as well as France’s anti-waste for Circular Economy law applicable in La Réunion.

Costs and business case scope

The feasibility study should assess the financial viability of the proposed EPR system across the region, including the full cost structure of collection, sorting, transport, processing, and end-market integration. This should cover both capital investment needs (e.g. infrastructure and potential regional hubs) and ongoing operational and maintenance costs, with particular attention to transport costs within and between islands. On the revenue side, the study should examine income from the sale of recyclable materials, considering market prices,

material quality, and access to end markets. The study should model different system configurations to determine minimum viable material volumes and assess whether regional approaches can deliver economies of scale.

Overall, this analysis will define the business case for the preferred system design, identifying key cost drivers, risks, and conditions for long-term financial sustainability.

Operational and infrastructure scope

Building on the research conducted to date for the background document (see Annex II), the feasibility study should undertake a more detailed assessment of the operational and infrastructural conditions across IOC member states. This should include an evaluation of existing waste collection coverage, the availability and adequacy of sorting and logistics facilities, and the role of port and export infrastructure in supporting regional material flows. The study should specifically explore the viability of regional processing hubs, leveraging Madagascar's industrial capacity to process materials from neighbouring islands. The study should also examine current data systems for tracking packaging materials and identify key capacity, resource and infrastructure gaps that may affect the viability of EPR implementation.

Material flow scope

Focus should be on gathering and analysing data on consumption, production, and import/export flows of plastic packaging, addressing gaps between imported resins and recorded waste. Harmonization of HS Codes needs to be prioritised to enable accurate tracking of plastic imports/exports. The feasibility study should also consider mature reuse projects, such as Citeo’s 5% ringfence for reuse in La Réunion, which could serve as a model for other IOC Member States.

Social scope

The current role of the informal sector in waste management across IOC member states should be mapped and documented, as the informal sector often plays a critical role in material recovery in many island and developing country contexts (particularly in cities like Antananarivo and Port Louis). Their integration in EPR system design from the outset is widely recognised as an important dimension of fair and effective waste governance. Particular attention will be paid to the gender dimension.

At present, informal sector actors globally not only express concern, but have also observed in practice that the introduction of EPR schemes can result in economic displacement and heightened competition for materials with new waste sector players.[5] However, if designed with informal sector integration from the outset—including mechanisms for formal registration, provision of PPE, and guaranteed buy-back rates—EPR systems founded on inclusive approaches can be mutually beneficial, improving environmental outcomes, protecting livelihoods and often bringing economic co-benefits.

Regional cooperation and trade scope

Current trends, opportunities and costs of cross-border movement of packaging and waste should be examined, with the aim of assessing the potential for shared regional or sub-regional waste management hubs and treatment facilities, as well as for exporting recycled

[5] Demaria, F., Vico, D., & Gabard, L. (2025). Contested Waste: Environmental conflicts and waste picker resistance in the Global South. (1st ed.). Routledge. https://doi.org/10.4324/9781003468516

plastic packaging to international markets. This should include an analysis of existing cooperative arrangements, such as the partnership between Seychelles and Mauritius, where collaboration on plastic recycling is already underway.

The feasibility study should also support the development of harmonised standards and definitions, including common definitions for waste and plastics. This was identified as a priority during the November 2025 scoping workshop, in order to reduce regulatory gaps and address potential blind spots, such as in relation to customs controls for in-scope plastic packaging.

Institutional and governance scope

In developing a regional EPR for SIDS and remote areas, one of the key structural decisions concerns the role and structure of the regional scheme administrator. There are two potential approaches: either creating a new, dedicated entity or embedding the scheme within an existing regional organisation.

A key element of the feasibility study should therefore be to evaluate whether the IOC could function as the regional scheme administrator, and if so, to clarify its operational responsibilities. This should include assessing the feasibility of the regional scheme administrator directly collecting and aggregating data from national and local stakeholders and managing collection, or whether these functions will be undertaken by the National PROs. The study should also explore whether the regional scheme administrator could act as the sole trader for the recycled waste, or whether the sub-regional waste hubs could also act as traders, as well as whether they will function as a non-profit or for-profit entity.

Other key elements of the feasibility study should include identifying the potential structure and composition of Producer Responsibility Organisations (PROs) or equivalent entities, as well as the thematic subcommittees that may operate under the regional scheme administrator and a regional EPR governance council. In doing so, the study will seek to build on and complement existing institutional arrangements, avoiding duplication where suitable bodies are already in place, such as the current EPR Working Committee or established public–private platform.

Out-of-scope clarifications

The study should not cover detailed scheme design, engineering designs of facilities, full legislative drafting, implementation funding commitments, non-packaging hazardous waste streams, or EPR for tyres, which require a separate and specialized workstream.

4. Roadmap to feasibility

The primary objective of the proposed feasibility study is to assess the viability of a regional EPR scheme and define the high-level parameters required for its potential implementation. It should provide each Member State with a structured framework to identify the key steps needed to align national waste management systems with a shared regional approach, without extending into detailed scheme design. Success will depend on the study's ability to reflect the unique operational and political contexts of each Member State, ensuring that regional cooperation reinforces, rather than duplicates or overrides, national efforts.

Therefore, to ensure a functional and integrated model, the study should deliver the following sequential workstreams:

First step: defining national baselines and readiness milestones

The study should begin by diagnosing the unique starting point of each Member State. It should define the specific foundational gaps that must be closed before a country can "plug in" to the regional system. This will entail:

- **National capability audits:** identifying the specific legislative, infrastructural, and fiscal hurdles in each country.
- **Data standardisation:** assessing options for improving alignment in HS code classification and identifying a suitable starting point for harmonisation across Member States. This should include high-level recommendations to support more consistent tracking of plastic imports, while recognising that detailed protocols and implementation guidance would be developed in a subsequent phase.

Second step: identifying national operational requirements

Once the baseline is set, the study should provide each country with a bespoke set of national operational requirements. This will help to develop national EPR systems that are effective locally while remaining compatible regionally.

- **Operational mechanics:** assessing the feasibility of different approaches to fee collection, ring-fencing of funds, and administrative workflows, including how these could function in practice across national and regional levels.
- **Social inclusion frameworks:** assessing the feasibility of mechanisms to integrate informal collectors into the formal EPR value chain, including approaches to PPE distribution, registration systems, and service fee payments.
- **Pilot readiness:** Identifying and evaluating "quick-win" sectors (such as HORECA or specific polymer streams like PET) where EPR mechanisms could be piloted in the near term.

Third step: building the regional framework

The final step is to establish the linkages between the five national systems. The study should identify the institutional and logistical connectors required to create a unified market.

- **The regional model:** assessing governance options to address the "trust gap," evaluating mechanisms that could prevent double taxation and ensure fiscal transparency across borders.

- **Transboundary logistics and trade:** evaluating the viability of defined resource corridors for waste movement. This includes examining compliance requirements under the Basel Convention, EU Waste Shipment Regulation, and national frameworks, as well as identifying potentially cost-effective maritime routes for transporting materials to regional processing hubs.
- **Collective bargaining protocols**: exploring the potential for a unified regional voice, enabling the five nations to negotiate collectively with multinational brand owners for improved packaging design and stronger producer accountability.

4.1 Methodology and data requirements

Table 1, below, provides an overview of the key proposed design elements to be assessed in the feasibility study, together with the main considerations associated with each component of a potential regional EPR system. These elements are explored in more detail in Common Seas' research report *Regional EPR: A potential solution to reduce plastic pollution in SIDS and Remote Geographies*. In summary, the core design components of a regional EPR Scheme include:

- The legal basis and institutional set up
- Operational flows and end markets
- Financial flows and obligated entities
- Governance and enforcement

The table also highlights both the data that is already available and the additional information that will be required to complete the analysis. To maximize efficiency and avoid redundancy, the feasibility study will draw on data from existing studies and initiatives, including the country profiles currently being developed through the IslandPlas project.

For each design element, the table also outlines the proposed methodology and potential sources for obtaining the missing data. Together, these elements form the methodological framework of the study, guiding how legal, operational, financial, and governance aspects of the proposed system will be analysed and substantiated through targeted data collection, stakeholder engagement, and complementary technical assessments.

Table 2. Overview of existing and required data and methodology for the feasibility study

Design element	Main considerations	Existing data	Additional data required	Key data source(s) / methodology
Legal Basis and institutional set-up	Mandatory vs. Voluntary approach: Assessing the shift from failed voluntary systems (e.g. Mauritius' PolyPet) to mandatory regional alignment.	• On-going policy work for the feasibility for a national EPR scheme in Comoros • On-going policy work in Mauritius for the National Plastic Roadmap and the circular economy law • On-going policy work in Seychelles: authorities plan to extend the DRS to PP and HDPE (food packaging) and broaden bans on take-away containers and straws • On-going policy work in Comoros: while a PET buy-back centre was established in Mohéli, the national diagnostic and financial data remains "unreliable." ExPLOI will provide legal and financial experts in May 2026	• NDA-protected market share interviews Legal desktop review of national statutes • Audit of legislative gaps • Cross-analysis for the five jurisdictions on the Basel Convention with the EU Waste shipment regulation • Analysis needed for voluntary incentives in the absence of national EPR scheme for specific jurisdiction within the region	• Work with Circulearth or with specialised legal firm • International civil servants, IOC civil servants, national policy makers and parliamentary consultations • Stakeholder mapping and engagement needs for both public and private entities
	Single vs. multiple scheme administrators: Determining if the IOC acts as the central hub		• Legal definitions: harmonised across five jurisdictions.	

Design element	Main considerations	Existing data	Additional data required	Key data source(s) / methodology
	or a "Light-touch" coordinator	to build a formal packaging database. • High-level policy work within the Nairobi Convention with the 5 IOC member states and 5 external countries, including Zambia which has close connections with Comoros • Material flow analysis: ongoing country profililng by IslandPlas project funded by UICN and Coca-Cola Foundation • GEF ISLANDS: strategy development for producer engagement in hazardous waste (including plastic)		• Capacity building programme
	Non-profit vs. for-profit entity to administer the system		• Market share and list of producers/importers in order to understand the different parts of the market and different sized brand owners	
	Leveraging an established regional entity vs. creating a new entity			
	Structure and role of the national PROs/entities			• NDA-protected market share interviews. • Consultation with the main brand-owners, retailers and importers
Operational Flows and End Markets	Data tracking and management	• Port import volumes (bulk tonnes)	• Polymer-level granularity (PET vs. HDPE vs. Multi-layer)	• Revive the 2020 CAP Business study with a larger scope

Design element	Main considerations	Existing data	Additional data required	Key data source(s) / methodology
		• EY report on economic relationships between islands • Partial data on the maritime roads and the access to end markets	• Maritime "missing link" Analysis: Costing specific shipping routes between islands.	• Implement an engagement process in order to get private sector buy-in.
	Material flows through regional/sub-regional waste management hubs	• CAP Business study, which explored a regional PET recycling unit (2020)	• Data from custom agencies • Link with the legal part - regional hubs: mapping of potential for bilateral agreements to export waste to regional treatment plants (example with Madagascar for PET)	• Customs audit: review of HS Codes to separate "content" from "container. • Need for a mandate to get access to specific data from the custom agencies. For example with La Réunion a mandate will be required from the region executive
	Accessing end markets		• Review of the waste flows between islands and the specific part of plastic waste per end market	• Mapping the access to the end markets through the revival of the

Design element	Main considerations	Existing data	Additional data required	Key data source(s) / methodology
				2020 CAP business study
Financial flows and Obligated Entities	Obligated entities within the region	• Partial knowledge/availability of the current municipal waste budgets and fiscality • Stakeholder mapping and engagement needs	• "Net Cost" per tonne for collection and sorting in each SIDS context. • Producer revenue data to determine equitable fee tiers.	• Stakeholder Surveys with different-sized brand owners (SMEs vs. Multinationals).
	The process for fee collection		• Producer revenue data to determine equitable, tiered fee structures.	• Economic feasibility study to support national work on EPR and better reflect the fee
	Budget spending and fair allocation of funding		• More granular data and assessment on economic needs per Member State to implement separate collection and the costs of the maritime transports	
Governance and enforcement	Governance roles for monitoring and oversight of the regional EPR scheme	• IOC mandate • La Réunion: standard Operating Procedures (SOPs) from Citeo	• Design of a regional digital registry.	• Governance workshops • Specific workstream on the data platform

Design element	Main considerations	Existing data	Additional data required	Key data source(s) / methodology
	Monitoring, reporting and verification processes	• International benchmark on EPR schemes and PROs governance	• Enforcement protocols for national customs vs. regional	• Benchmarking against international "One-Stop Shop" EPR registries.
	Dispute resolution mechanism		• Legal mandate, clear distinction of responsibilities, audit and compliance process and penalties for non-compliance	• International civil servants, IOC civil servants, national policy makers and parliamentary consultations

4.2 Key deliverables

The feasibility study should deliver a set of key evaluation dimensions to support decision-making. These dimensions are interrelated components of the overall feasibility study and should be considered as forming a single, integrated evidence base rather than standalone deliverables:

- **A readiness assessment** (see Annex V) for each participating country, identifying institutional capacity, regulatory gaps, infrastructure and financing needs, data, monitoring and performance and priority actions required to operationalise EPR successfully.
- **A financial and economic feasibility assessment**, including cost modelling of collection, sorting, recycling and disposal systems, and producer financing mechanisms.
- **A governance and institutional framework assessment**, identifying whether appropriate structures already exist, or could be reasonably developed, including to act as the PRO or equivalent body, and for oversight arrangements.
- **A legal and regulatory analysis**, identifying required policy reforms, enabling legislation, and options for harmonisation or mutual recognition across participating countries to support a coherent regional EPR approach.
- **An assessment of waste management and recycling system requirements**, including infrastructure gaps, operational capacity needs, and potential opportunities for regional collaboration on treatment, export, or shared facilities.
- **A set of implementation options and phased pathways,** reflecting varying levels of national readiness and allowing for staged introduction of EPR obligations over time.
- Finally, the study will provide a set of **recommendations and priority actions for governments**, the private sector, and regional partners, including capacity-building needs, technical assistance requirements, and opportunities for alignment with international best practice.

4.3 Stakeholder mapping and engagement

At the outset of the feasibility study, a comprehensive stakeholder mapping exercise should be undertaken to ensure that all relevant actors are identified and appropriately engaged throughout the process. This mapping should build on the preliminary list provided by the Indian Ocean Commission (see Annex IV), which should be reviewed and validated to confirm completeness and to identify any additional stakeholders that may play a critical role in the design, implementation, or oversight of an EPR system at the regional level.

Key stakeholder groups include private sector actors across the product and packaging value chain, such as importers, producers, manufacturers, retailers, and distributors. Private sector buy-in has been identified as crucial to the regional scheme's success. Engagement should also extend to customs authorities, given their role in monitoring imports and supporting compliance mechanisms. Regional and national government stakeholders will be essential counterparts, particularly ministries and agencies responsible for environment, waste management, finance, trade, and regulatory enforcement. Waste management operators, including both formal service providers and informal sector collectors and recyclers, should be engaged to ensure that on-the-ground realities, capacities, and livelihoods are fully considered in the feasibility assessment. Municipal authorities, port authorities, and other local-level institutions should also be consulted due to their operational responsibilities in

waste collection, disposal, and cross-border material flows. In addition, on-the-ground local consultants should be identified in each island to ensure the feasibility study is developed efficiently and with strong contextual understanding.

To support timely and effective participation, the study should establish clear engagement channels early on. Direct outreach to stakeholders should be prioritised where appropriate, while strategic involvement of the Director General's office may be used to formalise communication and secure high-level buy-in. In particular, introductory letters from the Director General may be frontloaded at the beginning of the process to facilitate access, avoid delays, and ensure consistent stakeholder cooperation throughout the study period.

The feasibility study should also leverage partnerships to strengthen regional capacity and alignment with international best practices. Collaboration with the GAP for EPR, for example, could provide opportunities for technical support, peer learning, and targeted capacity-building activities for regional stakeholders involved in EPR development and governance.

Finally, existing or emerging coordination structures - such as the Public-Private Platform and the EPR working group—should be used as an advisory mechanism throughout the feasibility study. These bodies should serve as a forum for ongoing dialogue, stakeholder validation, and iterative review of interim findings and deliverables. This approach will help ensure transparency, build shared ownership of the process, and improve the relevance and feasibility of proposed EPR system options.

In addition, stakeholder engagement should be designed to reflect the regional nature of the EPR initiative, ensuring balanced representation across countries and stakeholder categories. Engagement activities should include consultations, targeted interviews, workshops, and feedback loops to ensure that stakeholder perspectives inform key elements of the feasibility assessment, including governance arrangements, financing mechanisms, implementation readiness, and potential social and economic impacts.

4.4 Governance and resource plan

This section outlines the governance arrangements and resource requirements for the feasibility study. Resource needs are aligned with the key evaluation dimensions, ensuring adequate expertise and capacity to deliver actionable insights for each Member State and for regional coordination.

4.4.1 Governance framework

To ensure the feasibility study is both technically robust and politically endorsed, the project should operate under a multi-level governance structure designed to bridge the gap between regional strategy and national implementation.

- **Regional EPR steering committee**: chaired by the IOC Secretariat, this body should include National Focal Points from the five Member States / the ministries of environment and the EPR working group, one representative from the ExPLOI project and one representative the Western Indian Ocean group of the Nairobi Convention. Its role will be to provide strategic oversight, unblock political barriers, and ensure alignment with national frameworks

- **Technical working group**: a consultative body comprising the ExPLOI technical team, IslandPlas leads, and representatives from the private sector, including those

from the Public-Private platform. The technical working group will validate technical data and analysis.

- **Project management unit**: led by Common Seas in collaboration with a specialised consultancy consortium to execute the day-to-day research and stakeholder engagement.

4.4.2 Resource Requirements for feasibility study

Delivering a comprehensive feasibility study to evaluate the viability of a regional EPR scheme will require coordinated investment across a range of technical, legal, financial and institutional dimensions. As outlined in Table 4 below, these resource requirements are organised around key evaluation components that collectively support a robust assessment of national readiness, regional alignment and long-term sustainability. They also reflect the need for both specialised technical expertise and effective stakeholder coordination across IOC Member States.

Table 4. Summary of the resource requirements

Feasibility study evaluation dimension	Estimated budget required	Description	Human resource requirements
Legal and regulatory alignment	£35,000- £55,000	Diagnostic of national legal gaps and drafting of the specific "steps" (decrees/acts) required for each country to align with the regional vision.	One international EPR policy specialist and five national legal consultants
Financial and economic mechanisms	£35,000 - £60,000	Analysis of polymer-specific "net costs" (collection/sorting) and potential national/regional fee mechanics to ensure long-term sustainability.	One financial modeller and one market data analyst.
Regional coordination and private engagement	£25,000- £40,000	Facilitating the "unified 5-nation voice." Building the trust bridge with global brands and coordinating the regional steering committee.	One regional coordination lead and one private sector facilitator.
Operational flow and logistics analysis	£25,000 - £40,000	Mapping the "missing delta" (imports vs. waste) and identifying maritime "resource corridors" between islands.	One data analyst expert and one maritime logistic expert
Technical capacity building	£20,000- £35,000	Developing EPR transition Handbooks and hosting targeted workshops for public	One technical training lead. One content/communications specialist.

		and private stakeholders	
National readiness and step-by-step planning	£10,000 - £15,000	Translating technical data into National Readiness Scorecards—a clear manual of actions for each Member State.	Project Lead (Integrated role) supported by five national focal points.
Total	£ 150,000- 245,000		

To achieve a fully operational regional EPR system, additional funding will be required for high impact workstreams that fall outside the scope of the feasibility study. These activities - including full legislative drafting, system design, infrastructure engineering, the development of a regional digital registry, a specialised workstream for tyres, and informal sector pilots - are crucial for moving beyond feasibility into the physical, institutional, and legal launch of the scheme; and could be coordinated with the second phase of the ExPLOI project. The feasibility study will provide critical insights into the requirements, timelines, and technical specifications for these activities, helping to prioritise and sequence them in a phased rollout.

An overview of the indicative timeline for the feasibility study is presented in Table 5. The timeline sequences activities from initial mobilisation and data validation through to technical assessments, capacity building, and final delivery. This phased approach ensures that findings are iteratively developed, validated with stakeholders, and translated into actionable outputs for Member States.

Table 5. Indicative timeline of feasibility study activities (one year)

Month	Milestone
Month 1	• Identifying relevant consultants to join the consortium
Month 2-3	• Study mobilisation and inception approval
Month 4 - 6	• Country readiness and baseline data validation
Month 6-9	Assessment of: • The legal basis and institutional set up • Operational flows and end markets based on the country profiles • Financial flows and obligated entities, based on the accessible reports and data • Governance and enforcement
Month 9-10	• Capacity building on EPR
Month 10-11	• Creating National Readiness Scorecards based on the legal/operational/financial and governance assessments
Month 12	• Delivery of final feasibility assessment

5. Risks, assumptions and constraints

5.1 Risks

The feasibility study may face a number of risks that could affect the quality, timeliness, or applicability of its findings. A key risk relates to **stakeholder engagement and participation**, particularly given the wide range of actors involved in an EPR system, including private sector producers and importers, informal sector recyclers, municipal authorities, and national regulators. Limited availability, uneven buy-in, or delays in stakeholder coordination could reduce the inclusiveness of consultations and slow progress in validating interim outputs. Strong local partners will be essential for effective on-the-ground data collection and stakeholder engagement. Without securing such partners, there is a risk that both data quality and stakeholder participation will be compromised.

A further risk concerns the **availability and reliability of data** required to assess waste flows, product import volumes, recycling capacities, and existing collection systems. In many contexts, data may be fragmented, outdated, or inconsistent across countries, which could constrain the ability to model financial and operational scenarios accurately.

Given the regional scope of the initiative, there is also a risk of **divergent national policy priorities, regulatory readiness, or institutional capacity** across participating countries. Differences in legal frameworks, enforcement mechanisms, and market structures may complicate the identification of harmonised regional approaches or shared governance models.

The study may also be affected by **market and economic uncertainties**, including fluctuations in material prices, in particular owing to the current situation in the Middle East, limited domestic recycling markets, or changes in producer/importer behaviour. These factors could influence the financial sustainability of proposed EPR schemes.

An additional risk relates to the **ability to secure sufficient funding** to carry out the feasibility study itself. In the current funding landscape, which is increasingly competitive and constrained, there is a possibility that required financial resources may not be mobilised in a timely manner or at the necessary scale. This could delay the initiation of the study, limit its scope, or affect the depth and quality of analysis undertaken.

Finally, there is a risk that the **design of an EPR system may not sufficiently account for the role of the informal sector**, potentially leading to social impacts or resistance if livelihoods are disrupted. Ensuring that informal collectors and recyclers are meaningfully included in consultations will therefore be essential.

5.2 Assumptions

The feasibility study is based on several key assumptions. It assumes that participating countries and regional institutions remain committed to exploring a coordinated approach to EPR and that relevant authorities will provide timely access to information, stakeholders, and policy documentation.

It is further assumed that producers, importers, and other private sector actors will engage constructively in the process and recognise the long-term benefits of improved waste management systems, despite the potential introduction of new compliance obligations or fees.

The study also assumes that sufficient baseline information can be obtained through a combination of available datasets, stakeholder inputs, and reasonable estimates to allow for the development of viable technical, financial, and governance scenarios.

In addition, the assessment assumes that regional collaboration mechanisms—such as the EPR working group and public-private platform—can function as effective advisory bodies to support validation of findings and alignment across countries.

5.3 Constraints

The feasibility study will be conducted within a number of practical and structural constraints. These include time and resource limitations, which may restrict the depth of data collection or the extent of field-level validation across all countries and stakeholder groups.

The regional nature of the initiative also introduces constraints linked to institutional complexity, as an EPR system may require coordination across multiple jurisdictions, languages, administrative systems, and regulatory environments.

In some countries, limited enforcement capacity, gaps in waste infrastructure, or the absence of established producer responsibility frameworks may constrain the immediate implementability of certain EPR models, even if they are technically feasible in the long term.

Finally, the study must operate within the evolving context of national and regional policy development, meaning that parallel reforms or political changes during the study period could affect assumptions, stakeholder priorities, or implementation pathways.

These risks, assumptions, and constraints will be monitored throughout the feasibility study, and mitigation measures, such as adaptive stakeholder engagement strategies, triangulation of data sources, and phased implementation options, will be incorporated into the analysis and recommendations.

6. Conclusions and next steps

This scope of work document defines the scope, methodology, intended outputs and resource requirements of a feasibility study for a regional EPR system for plastic packaging across IOC Member States. The study is positioned as a bottom-up, evidence-based assessment designed to evaluate the technical, legal, financial and institutional conditions required to enable effective regional cooperation.

The proposed feasibility study is fully aligned with the 2023 mandate of the IOC to accelerate the transition towards a regional circular economy. It also aligns with the six-part strategy outlined in the "*Next Steps of EPR for the Island States of the Indian Ocean*" report, including the assessment of national waste systems, mapping of recycling and export opportunities and enhancing maritime cooperation. Stakeholder consultations undertaken during the scoping phase confirm broad support for a regional approach, while also identifying key enabling conditions that must be assessed through the feasibility study. In particular, stakeholders consistently highlighted data harmonisation as a critical prerequisite, including the alignment of customs codes (HS codes), improved transparency on materials flows, and the establishment of reliable and auditable data systems. More broadly, there is clear prioritisation of governance, legal alignment and institutional capacity as foundational elements.

An estimated budget of between £150,000–£250,000 is required to undertake the feasibility study and will require resource mobilisation. While this represents a critical first step, additional funding will be necessary to move beyond feasibility towards system design and implementation, including activities such as legislative drafting, infrastructure, governance and operational design, digital system development, and the rollout of pilot projects.

Next Steps

Progression to the feasibility phase will require the following priority actions:

- **Resource mobilisation**: secure funding to support the full implementation of the feasibility study, including its technical, legal, financial and operational components.
- **Initiation of the feasibility study:** launch the study in line with the defined scope and methodology, including national-level diagnostics and regional-level analysis.
- **Data strengthening and harmonisation**: Advance work on data collection and standardisation, with a particular focus on HS code alignment to support consistent tracking of plastic packaging flows across IOC Member States.
- **Stakeholder engagement**: continue structured engagement with public authorities, private sector actors and regional initiatives to validate assumptions and ensure alignment.

These steps will enable the feasibility study to deliver a comprehensive and actionable assessment of the conditions under which a regional EPR system for plastic packaging can be effectively developed and implemented, supporting a coordinated transition towards a circular economy across IOC Member States.

ANNEX I – ORGANISATIONS INTERVIEWED

Member State	Organisations
Mauritius	Mauritius Chamber of Commerce and Industry (MCCI) Mautopia Business Mauritius
Madagascar	Ministry of Environment
Comoros	Customs Directorate Waste Agency
La Réunion	Syndicat de l'Importation et du Commerce de La Réunion (SCIR) Customs Directorate
Seychelles	/
Regional	ExPLOI project

ANNEX II – BACKGROUND DOCUMENT

Introduction

Context

Plastic and tyre waste represent growing environmental and economic challenges in the Indian Ocean region. Land-based plastic inputs are significant: studies estimate that around 15 % of global oceanic plastic waste enters the Indian Ocean basin, representing between 0.47 million and 2.75 million tonnes per year of macroplastics. Furthermore, the regional seas lack sufficient infrastructure for collection, treatment, recovery and export of plastic waste; for example, one assessment noted that less than 5 % of plastics are recycled in the Western Indian Ocean.

In the case of SIDs in the region, logistical and geographic constraints magnify these challenges since many islands still operate with inadequate sorting, recovery and disposal systems.

Given this context, a regional approach is warranted. Therefore, an Extended Producers Responsibility (EPR) policy adapated at the regional level offers an opportunity to shift costs and incentives upstream, engaging manufacturers, importers, and distributors of plastic and tyre products in supporting waste management, recycling, and recovery initiatives. The transboundary nature of marine pollution means that individual island actions, while necessary, are not sufficient: coordinated efforts around collection, recovery, and export of recyclables through a regional platform can deliver economies of scale, harmonised regulatory frameworks, and improved access to end markets.

The importance of regional coordination is reinforced by existing initiatives. The Indian Ocean Commission (IOC) has already been active in developing regional action plans on marine plastic pollution and circular economy, highlighting the need for aligned policy, sustainable infrastructure financing, and active industry engagement. A regional EPR scheme could complement these efforts by providing a structured mechanism for financing, operational coordination, and policy harmonisation, ensuring that interventions are both economically viable and environmentally effective.

Ultimately, this background document and associated workshop aim to explore how a regional EPR approach could be designed and implemented in the Indian Ocean region, considering the unique geographical, economic, and social realities of small islands and remote territories, and to identify the opportunities and challenges associated with pooling resources, harmonising rules, and engaging producers in sustainable waste management solutions.

Scope of the project

The IOC has been mandated by its Member States to leverage partnerships and resources to accelerate the promotion of the circular economy at the regional level, including through EPR for the plastic packaging waste value chain.

Common Seas, a social enterprise that collaborates with governments and leading organisations in Small Island Developing States and small coastal countries dedicated to stopping the flow of plastic pollution, entered into a partnership with the IOC in October 2025

to support the development and implementation of a regional EPR framework for plastic packaging.

Common Seas recently led research – in collaboration with Circulearth, the Global Plastics Policy Centre, Africa Circular, WRAP and the Australian, New Zealand and Pacific Islands Plastics Pact (ANZPAC) - exploring the potential benefits and design considerations for a regional approach to EPR.

Building on this research, and on the existing efforts towards the development of regional EPR for the IOC Member States – including the "Next steps on EPR in the Indian Ocean Region" document produced with funding from the GAP for EPR and in partnership with the Africa Circular – this partnership will involve three phases of support:

1. A scoping workshop to align key stakeholders and begin scoping the feasibility study.
2. A feasibility study to assess legal, operational, financial and governance mechanisms for the regional EPR framework.
3. Implementation of the regional EPR framework.

This background document is focused on phase 1 of the project, the regional scoping workshop.

Regional EPR approach by Common Seas

EPR is an environmental policy approach in which producers assume significant responsibility for the end-of-life management of their products, particularly regarding recycling and disposal costs. Increasingly, EPR is recognised as a key mechanism for advancing circular economy objectives, with over 400 schemes now in operation worldwide.

EPR operationalises the Polluter Pays Principle by shifting responsibility for waste management from local governments to producers. In doing so, it provides incentives for more sustainable product and packaging design while ensuring consistent financing for post-consumer waste management. It is widely regarded as the only proven model capable of delivering reliable funding for the collection, sorting, and recycling of post-consumer waste.

While EPR has historically been more common in high-income countries, its adoption is growing in low- and middle-income economies. Major packaging producers also support EPR, recognising its potential to create a level playing field and provide regulatory and market certainty.

Despite this support, the adoption of EPR in remote geographies remains limited, typically restricted to deposit return schemes. There is also a notable gap in both academic literature and policy frameworks concerning EPR SIDS. Existing analyses frequently emphasise global standards, with little consideration for the nuanced challenges faced by small islands and remote territories.

These challenges, however, do not render EPR unworkable in remote geographies. Rather, they underscore the need for a tailored approach. This raises a critical question: what does EPR mean in the context of remote territories, and how can it be designed to be both effective and feasible? Understanding how such territories can adapt EPR schemes to their

unique economic, social, and geographic contexts is essential for developing a comprehensive set of solutions to address plastic pollution in these regions.

In this context, from December 2024 to November 2025, the analysis investigates the potential for a regional EPR approach specifically tailored to the social, economic, and environmental contexts of SIDS and remote territories. The project follows a structured timeline: beginning with stakeholder interviews, followed by research and drafting of a comprehensive report and summary paper, a consultation period in August, and targeted webinar and dissemination support in October, culminating in the launch of the final report at the end of November 2025.

The primary aim of the initiative is to assess whether a regional EPR model can address the structural challenges faced by island and remote communities. By pooling resources across multiple territories, such a model could achieve economies of scale beyond the reach of individual islands, reduce logistical costs, facilitate shared infrastructure, establish sustainable financing mechanisms, and encourage product design better suited to the realities of small island markets.

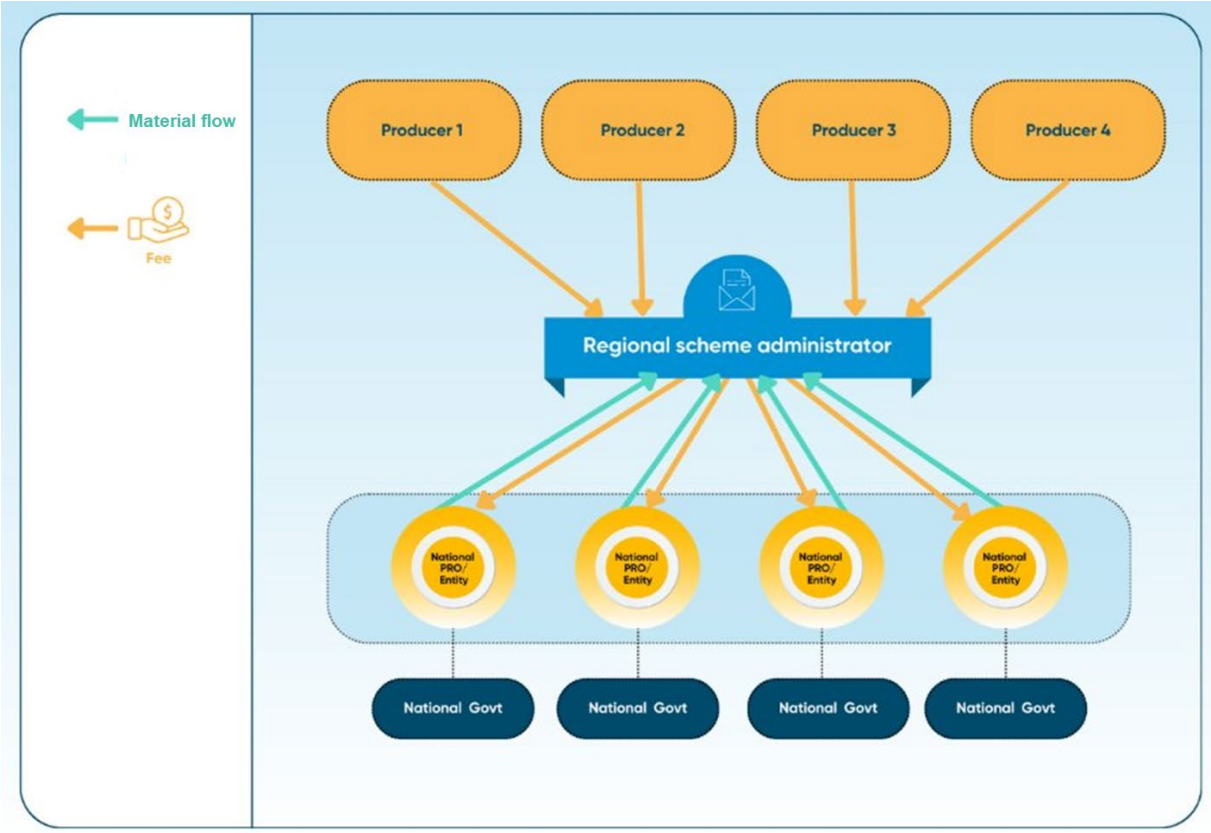
From an operational perspective, a regional approach offers several advantages. Aggregating waste volumes across islands increases the financial viability of recycling systems, while coordinated logistics allow for optimised collection and transport routes, reducing overall costs. By moving from isolated, fragmented operations to an interconnected regional network, territories gain the capacity to address legacy plastics—waste accumulated over decades that often exceeds the management capacity of local authorities.

The approach also enhances the effectiveness of the EPR schemes themselves. A regional system representing multiple territories wields greater market influence, enabling stronger engagement with international producers to promote eco-design and sustainable product choices. Harmonised regional rules reduce the risk of non-compliance by ‘free riders’ and broaden accountability, ensuring that brand owners—not only local importers—are responsible for packaging waste. By creating an industry-funded system, the model also reduces the financial and operational burden on public institutions, which are frequently overstretched in remote island contexts.

Beyond direct operational impacts, regional coordination provides significant co-benefits. The aggregation of data and harmonisation of rules across territories improves transparency and traceability across the supply chain. Producers benefit from simplified compliance, while the collective volume of recyclable materials enhances market access and pricing. Crucially, a successful regional EPR system is socially inclusive, integrating local communities and existing informal waste handlers into formal infrastructure while ensuring that they benefit from the transition to a coordinated framework.

The proposed regional EPR model places a central administrator at its core. Producers contribute a single, harmonised fee to this administrator, who then channels material and

financial flows to national EPR entities in each participating country according to local and regional contexts. This centralised coordination ensures that compliance and material flows are managed efficiently, maximising potential economies of scale while retaining flexibility to accommodate local conditions.



The complete technical report focuses on four core design elements of a regional EPR scheme: legal basis, operational flows, financial flows, and governance. For each element, the report examines a range of options, assessing their respective advantages and limitations. This provides a structured framework for workshop discussions, enabling participants to explore how a regional approach could be effectively implemented in small island and remote contexts.

Institutional, operational and financial considerations for the Indian Ocean region

Understanding the three core dimensions of the regional EPR readiness in the Indian Ocean region

Institutional framework: How responsibilities and decision-making are structured

Waste management governance across the IOC region varies widely in terms of institutional maturity, legal coverage, and readiness for EPR.

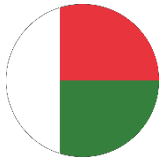
Islands with more developed systems, such as La Réunion and Mauritius, exhibit clearly defined multi-level governance structures, strong coordination between national and municipal authorities, and dedicated agencies for policy oversight, planning, and monitoring.

In contrast, smaller or less-resourced islands, such as Madagascar and the Union of the Comoros, face significant limitations in human and technical capacity, fragmented institutional arrangements, and weak coordination between national and local levels.

Legal and policy frameworks are similarly diverse. Some territories have comprehensive legislation covering multiple waste streams, enforcement mechanisms, and monitoring obligations, as seen in La Réunion and Mauritius. Others have only sector-specific or draft legislation, with limited targets, weak enforcement, and gaps in implementation, as observed in Madagascar and Comoros.

The adoption and operationalisation of EPR mechanisms also varies considerably. La Réunion has long-established EPR schemes covering more than 20 waste streams, while Mauritius has introduced EPR provisions in recent legislation, though regulations are still being implemented. Seychelles and Comoros have approved EPR policies or draft laws but lack formal operational regulations, and Madagascar has only an unimplemented e-waste law.

The table below summarises the maturity of institutional structures, legal and policy frameworks, and EPR readiness across the region, highlighting differences in governance capacity, legislative coverage, and preparedness for implementing producer responsibility initiatives.

Country	Maturity of the institutional framework	Maturity of the legal and policy framework	Focus on EPR regulatory framework
Madagascar 	The Ministry of Environment and Sustainable Development and the National Environment Office exist and are responsible for environmental management, monitoring, and impact assessment. Municipalities are responsible for waste collection. There is an ongoing process of decentralisation to transfer decision-making and service delivery to sub-national levels. Human and technical capacity at local level is limited, and coordination between national and municipal authorities is weak.	The National Sanitation Policy and Strategy doesn't include the polluter pays principle, and waste management legislation is fragmented. Sectoral laws exist, such as those for healthcare waste, but enforcement is weak. No national targets or comprehensive plans for waste prevention, recycling, or resource recovery have been established.	A law on waste electrical and electronic equipment exists with an EPR mention (Decree No. 2015-930) but isn't implemented.
Union of Comoros 	Waste management is largely centralised under the National Waste Management Agency. Technical and operational capacity is limited, and there is minimal coordination with local authorities.	Legal and policy framework is under development. A draft law on solid and chemical waste management has been proposed, but definitions, responsibilities, targets, and enforcement mechanisms are not yet established.	No EPR framework currently exists. The draft law is expected to introduce the first EPR system in the country.

	Municipal-level waste services are not well developed.		
Mauritius 	The national Solid Waste Management Division is responsible for overall policy and oversight, while municipalities collect waste from households and businesses. Coordination between national and local authorities exists, but human and material resources are limited, affecting operational capacity.	The Waste Management and Resource Recovery Act (2023) and the Environment Act (2024) provide a legal basis for waste management, including resource recovery and circular economy approaches. Sector-specific regulations exist for single-use plastics, polyethylene terephthalate bottles, and electronics. Some regulations are still in draft. National targets aim to divert a significant proportion of waste from landfill by 2030, and there are provisions for monitoring and reporting. Enforcement is partially implemented	The law includes provisions for EPR Draft regulations exist for electronic waste and beverage containers, including annual reporting obligations. No EPR regulations have yet been fully implemented
Réunion 	Municipalities have formed inter-municipal public cooperation establishments responsible for waste collection, and these cooperate through waste treatment syndicates.	The Plan for Waste Prevention and Management establishes clear definitions, targets, and strategies covering all waste streams. It follows the waste hierarchy and includes enforcement mechanisms.	EPR legislation has existed since 1992 and was revised in 2020 with the anti-waste and for a circular economy law

	The Regional Council oversees planning, monitoring, and consultation with all stakeholders, including the state, producers, professional associations, and civil society. Coordination is strong, with clearly defined responsibilities across levels of governance.	The plan includes targets for recycling, material recovery, and energy recovery, with monitoring and reporting obligations. A voluntary “zero waste” target by 2030 is included, and exemptions are carefully justified in terms of environmental impact. The majority of waste are recycled outside of the island in metropolitan area and countries trade partners	(AGEC law). More than 20 waste streams are covered by EPR schemes. Industrial and commercial packaging will be covered by the EPR scheme by next year.
Seychelles	The Landscape and Waste Management Agency under the Ministry of Environment and Energy is responsible for overall waste management, working with private operators for collection and treatment. Community-based groups participate in clean-up initiatives. Coordination exists but is limited. Capacity constraints affect the ability to monitor and enforce regulations effectively.	The National Waste Policy and the Solid Waste Masterplan provide a framework with definitions of waste categories, general targets, and strategies for management. The Environmental Protection Act establishes prohibitions on certain plastics and provides legal authority for collection schemes such as the PET bottle deposit system. Enforcement exists but is limited, and monitoring and compliance mechanisms are not fully operational.	The Cabinet has approved a policy on EPR in line with the Solid Waste Masterplan. No regulations have yet been formally implemented.

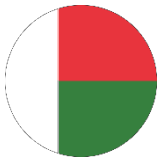
Operationnal flow

Waste management in the IOC region is characterised by a diverse and complex operational landscape, shaped by differences in island size, population density, governance systems, and geographic constraints. Collection coverage, sorting capacity, and recycling infrastructure vary widely between islands, while land availability, limited local treatment facilities, and logistical challenges constrain both recovery and disposal operations.

At the regional level, the IOC provides a platform for cooperation on environmental issues, including marine plastic pollution, waste prevention, and resource recovery. However, operational flows remain largely fragmented. Collection efficiency ranges from minimal coverage in smaller or resource-constrained islands to regular door-to-door collection in better-resourced territories. Sorting and recovery systems also vary: informal recovery dominates in low-capacity islands, whereas formal material recovery and energy-from-waste facilities exist in more developed territories.

Recycling and export of recovered materials are similarly uneven. Islands with limited local processing capacity, such as Madagascar and Comoros, rely on informal recovery and face significant barriers to entering local or export markets. In contrast, islands like Mauritius, La Réunion, and Seychelles have established partial material recovery systems, PET recycling schemes, and energy recovery infrastructure, although local recycling capacity often remains insufficient to fully process generated waste.

Inter-island connectivity, port capacity, and regional transport logistics are critical determinants of operational efficiency and access to end markets. Islands with higher liner shipping connectivity and better port infrastructure can more effectively export recyclables and integrate with regional markets, while those with limited connectivity face significant constraints in both recovery and market access.

Country	Collection - sorting systems (public, private, informal) and recovered material	Infrastructure availability and capacity (recovery, recycling, treatment)	Transport logistics - regional connectivity and end market access
Madagascar 	Weekly curbside collection Mixed waste only Lunicipalities responsible Informal sector active Collection rates low; waste generation ~0.2–0.4 kg/person/day	No formal recovery or recycling facilities; open dumps dominate Small pilot sorting centers in Antananarivo, Toamasina, Antsiranana	Internal transport to landfills; ports at Tamatave, Mahajanga, Antalaha, Maintirano; liner shipping index 28.20; inter-island shipping limited Minimal plastics exported
Union of Comoros 	Limited coverage (<35% daily removal); informal settlements poorly served Data scarce; collection and recovery poorly tracked	Almost no recovery or recycling infrastructure; open dumps dominate Some pilot PET/aluminium recovery; informal collection emerging	Ports under upgrade (Moroni & Mutsamudu); liner shipping index 15.67; inter-island shipping limited Very limited export or local markets
Mauritius 	Weekly door-to-door collection; private contractors; minimal sorting Landfill tonnage recorded (~537,147 t in 2019); recycling data partially available : only 3% to 5% plastic waste recycled	Mare Chicose engineered landfill with gas-to-energy; limited recycling;	Five transfer stations feeding landfill; port Louis liner shipping index 80.20; regional shipping moderate PET recycled locally; some materials exported; limited market for other plastics

Country	Collection - sorting systems (public, private, informal) and recovered material	Infrastructure availability and capacity (recovery, recycling, treatment)	Transport logistics - regional connectivity and end market access
Réunion 	Municipalities grouped in inter-municipal cooperatives; syndicates for treatment Plastics, metals, organics partially recovered; energy recovery for residual waste Data comprehensive; per capita plastic 37.5 kg/year; 75% recyclable waste sorted Energy recovery for residual waste (~61%), landfilling (~22%), material recovery (~7%); limited local recycling	Incineration and energy recovery; solid recovered fuel; methanisation for organics; recycling ~7% Limited material recovery; sorting mostly pilot or small scale Export of the waste in order to be recycled	Le Port liner shipping index 66.85; strong connectivity supports import/export of recyclables
Seychelles 	Roadside communal bins; collection by private contractor; no routine separation PET bottles, scrap metals, aluminium cans partially recovered Waste generation ~90,000 t/year (2017); ~1% recycled	Primary landfill (Mahé); Limited local recycling; PET bottle deposit scheme operational	Island hilly terrain; Victoria Port liner shipping index 24.71; inter-island transport limited PET recycled locally; other streams rarely reach market

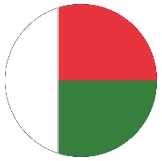
Financial flow: how costs and incentives on waste management are managed and distributed.

Financial flows for waste management across the Indian Ocean island states reveal significant disparities in how costs are borne, resources mobilised, and incentives structured. Smaller and less-resourced islands, such as Madagascar and the Union of the Comoros, operate under extremely constrained budgets. In these contexts, municipal authorities often rely on minimal household fees and external donor support to cover basic operational costs. In Madagascar, for instance, household fees typically cover less than 30 % of collection costs, and government spending per capita is estimated at only €0.36 per year. In Comoros, pilot collection schemes charge households approximately €3 per month, while national budgets remain highly limited. The restricted financial capacity in these states limits investment in infrastructure, equipment maintenance, and operational sustainability, creating a heavy reliance on external support from donors and international financial institutions.

By contrast, more developed island states such as Mauritius, Seychelles, and La Réunion demonstrate diversified financial mechanisms and stronger cost recovery. Mauritius invests between €25 and €42 per capita annually in waste management, leveraging a combination of council taxes, user fees, and financial incentives for recycling. Seychelles relies on levies on imported PET bottles and the Tourism Environmental Sustainability levy, generating over €13 million annually to support collection, disposal, and environmental rehabilitation activities. La Réunion employs an integrated financing system based on household taxes (TEOM/REOM) and an established Extended Producer Responsibility (EPR) framework, complemented by the export of recyclables to external processors. These mechanisms not only improve operational sustainability but also create incentives for waste reduction, recovery, and circular economy activities.

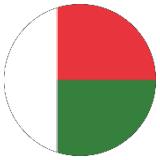
The distribution of costs and incentives across the region reflects the interplay between national capacity, population size, and economic structure. Islands with limited connectivity and smaller populations face higher per-unit collection and processing costs, constraining the ability to implement user fees at sustainable levels. In such cases, donor support and regional collaboration are critical to bridge financing gaps and support targeted interventions. Conversely, islands with stronger financial capacity and regulatory frameworks are better able to internalise costs, mobilise household contributions, and introduce producer-focused incentives that support extended producer responsibility, resource recovery, and circular economy initiatives.

The table below summarises approximate per capita spending, user charges, subsidies, and external funding across selected Indian Ocean island states, illustrating how financial responsibilities and incentives are currently managed and highlighting opportunities for harmonised regional approaches to strengthen waste management financing.

Country	Approximal spend per inhabitant (EUR/ year)	User charges - financial instruments	Subsidies	External funding – donor support
Madagascar 	0.36	Minimal household fees (cover <30% of collection costs)	Limited; municipal budgets highly constrained	Donor-funded projects (e.g., €2 million AFD grant for Antananarivo landfill); World Bank, international financial institutions
Union of Comoros 	Minimal; per capita spend not formally reported	Local pilot fees (~€3/month per household)	Very limited; national budget extremely constrained	UNDP/GEF ISLANDS project; international donors critical for institutional support and operational funding
Mauritius 	25-42	Council taxes including waste component; PET recycling incentives	Government subsidies and intergovernmental transfers	Donor and international financing; private contractors complement collection services
Réunion 	Between 148 and 193 euros depending on the waste flows	Household taxes (TEOM/REOM), fees for waste; integrated EPR system	Limited; primarily self-financed	EPR system supports operations; export of recyclables to external processors

Country	Approximal spend per inhabitant (EUR/ year)	User charges - financial instruments	Subsidies	External funding – donor support
Seychelles 	~38	PET bottle levies, Tourism Environmental Sustainability levy (per visitor/night)	Targeted subsidies for waste management activities	Donor support; revenue from levies (more than €13 million annually)

ANNEX III – COUNTRY PROFILES



Madagascar : emerging framework, informal recovery dominant

Institutional framework

Madagascar's waste management system is structured around the Ministry of Environment and Sustainable Development, which is responsible for environmental policy, regulation, and oversight, and the National Environment Office, which collects and monitors environmental data, enforces environmental regulations, and oversees environmental impact assessments.

Municipal waste collection is the responsibility of local municipalities, reflecting a decentralisation process that has been ongoing for the last two decades. This process aims to increase sub-national decision-making capacity, improve responsiveness to local concerns, and promote citizen engagement through elected representatives. While decentralisation has increased local responsibilities, municipalities face significant resource constraints and limited capacity for enforcement. Coordination across sectors is complex, as waste regulation responsibilities are shared with other ministries

The National Task Force monitors marine plastic litter with support from the Port, Maritime and Waterways Agency and the Ministry of Fisheries, illustrating the presence of inter-agency collaboration. Despite these structures, institutional capacity remains weak, and enforcement and compliance are limited due to insufficient human resources.

Legal and policy framework

Madagascar's legal and policy framework for waste management is still developing.

The polluter pays principle is not yet incorporated into the National Sanitation Policy, and Extended Producer Responsibility is not widely recognised. While a decree exists for the management of electronic waste (Decree No. 2015-930), it has not been implemented.

There is no comprehensive national policy or legislation for the circular economy, and regulatory gaps exist across most waste streams. Municipalities rarely have local waste management plans, contributing to low plastic collection rates.

The absence of clearly defined targets, weak enforcement mechanisms, and lack of implementation guidance represent significant barriers to effective waste management.

Financial flows

The financial capacity for waste management in Madagascar is extremely constrained. Government budgets for waste management are highly fragmented, with local authorities relying heavily on external support from donors and international financial institutions to fund both infrastructure and operational costs. User charges for waste collection are minimal and frequently insufficient to cover even basic service delivery. In many municipalities, household fees account for less than 30 % of the cost of collection services, and irregular fee collection further limits revenue streams. The informal sector plays a substantial role in waste recovery, yet financial data on its contributions remain scarce.

Public investment in waste management is extremely low, with per capita expenditure estimated at approximately EUR 0.36 per inhabitant per year, highlighting the inability of local authorities to finance comprehensive collection, recycling, or disposal services. As a result, large volumes of waste remain uncollected, and critical operations such as vehicle maintenance, fuel provision, and staff remuneration are often compromised.

The reliance on donor-funded projects, such as the €2 million Agence Française de Développement grant to improve landfill operations in Antananarivo, underscores the system's vulnerability and the limited potential for sustainable, locally generated cost recovery. While such support has enabled targeted infrastructure improvements and service enhancements, the recurrent operational costs of waste management remain largely unfunded, reinforcing the need for alternative financing mechanisms.

This financing gap illustrates why conventional municipal waste management approaches struggle in Madagascar and highlights the potential value of producer-financed mechanisms, such as EPR.

Operational flows

In practice, waste collection in Madagascar is typically once per week, with mixed waste collected via curbside containers. There is no separation of recyclable materials, and nearly all waste ends up in uncontrolled dumpsites, with 96.7% of waste reported to be disposed in open dumps.

Recycling- and material-recovery facilities are virtually non-existent outside of a very small informal recovery sector. For example, one study in the tourist island context of Nosy Be reported that waste-pickers operate in open dumps, recovering mainly metal scrap and reusable goods, but less than 1% of total waste is composted and formal recycling infrastructure is absent.The informal sector's contribution is recognised - for instance thousands of waste-pickers in the capital Antananarivo collect material from bins, transfer stations and dumpsites. However, the full economic scale, coverage, and impact of informal recovery across Madagascar remain poorly documented.

Additionally, regional connectivity remains constrained, with key ports at Tamatave, Mahajanga, Antalaha, and Maintirano having a liner shipping connectivity index of 28.2 out of 100, limiting efficient transport of waste or recyclables.

Preliminary assessment of EPR potential

The institutional framework, while formally established, faces capacity limitations that could hinder the implementation of a regional Extended Producer Responsibility system.

Legally, the existing framework for WEEE represents a starting point, but the lack of enforcement mechanisms and broader EPR legislation limits scalability.

Financially, the reliance on donor support and minimal user fees would require external or regional funding mechanisms to support EPR initiatives.

Operationally, the absence of adequate infrastructure and low collection coverage represent significant obstacles, though investments in sorting centres and the potential to harness informal recovery offer opportunities for improvement.

Overall, Madagascar could benefit from a regional EPR scheme, provided it is coupled with capacity-building and financing support.

Mauritius : structured policy, growing circular economy initiatives

Institutional framework

Mauritius possesses a comparatively mature institutional framework for waste management. The Ministry of Environment, Solid Waste Management and Climate Change is responsible at the national level, while the Ministry of Local Government and Disaster Risk Management oversees waste collection at the municipal and district levels. Door-to-door collection is co-ordinated via market allocation by district councils, utilising a hybrid model where private contractors, such as Maxi Clean Company Ltd, complement public service delivery. Operationally, larger municipalities may use their own fleets, while smaller municipalities are managed via district council vehicles and waste management companies. Notably, there is no direct waste management fiscality or local fee; instead, the entire system is funded through the national State budget. While the national Solid Waste Management Division, including its Resource Recovery Department, is staffed by qualified personnel, staff numbers remain insufficient to manage all ongoing and upcoming initiatives, particularly in the plastics and circular economy sectors. Despite these resource limitations, the co-ordination between national and local authorities allows for a clear division of responsibilities and supports planned developments in recycling and material recovery.

Legal and policy framework

Mauritius has developed a comprehensive legal and policy framework that integrates circular economy principles and supports the introduction of Extended Producer Responsibility. The Waste Management and Resource Recovery Act (2023) and the Environmental Protection Act (2024) establish the legal basis for shifting waste management responsibilities to producers.

However, while the legal framework is comprehensive, many regulations have not yet been operationalised, and actual recycling rates remain low, with only 3% to 5% of plastics currently recycled.

Financial flows

The Government of Mauritius invests approximately EUR 33 million annually in waste management, with local authorities contributing an additional EUR 21 million. Annual per capita expenditure is estimated between EUR 25 and EUR 42. User charges include council taxes that incorporate a waste management component and financial incentives for PET recycling. Despite these mechanisms, household awareness of fees is low, and cost recovery is limited.

The remainder of funding is drawn from government subsidies and intergovernmental transfers, which are supported by donor and international financing.

Overall, the system is better funded than most in the region, but financial sustainability could improve through enhanced cost recovery and expanded EPR mechanisms.

Operational flows

Waste collection in Mauritius occurs weekly on a door-to-door basis, with domestic and commercial waste transported to the Mare Chicose landfill, the island's only engineered landfill facility.

This landfill features a double liner system, leachate collection, and landfill gas-to-energy conversion, producing electricity for the national grid.

Small-scale sorting and PET recycling initiatives exist, with an estimated 3,500 tonnes of PET recycled annually.

Port Louis, the principal port, has a liner shipping connectivity index of 80.2/100, facilitating regional and international transport of waste and recyclables.

Preliminary assessment of EPR potential

Mauritius has strong institutional capacity, a comprehensive legal framework, and relatively well-developed operational systems, making it well-positioned to implement a regional EPR approach. The main obstacles are limited regulatory implementation, low recycling rates, and insufficient human resources for monitoring and enforcement.

Financially, existing levies and subsidies provide a foundation, but further mobilisation of user fees and producer contributions will be necessary.

Operationally, the centralised landfill and logistics capacity could support a regional EPR scheme, particularly for recyclable plastics and more largely for all plastic packaging from time to time.

Seychelles : policy approved, implementation limited

Institutional framework

The Seychelles' waste management system is overseen by the Landscape and Waste Management Agency, operating under the Ministry of Environment and Energy. Household waste collection is contracted to STAR Seychelles due to the island's hilly topography, which prevents door-to-door collection.

The Department of Environment regulates environmental compliance, while other ministries, including Health and National Development, participate intermittently, for example during environmental awareness days. Community groups and NGOs, such as Sustainability for Seychelles, contribute to waste management activities but are limited in scale.

The institutional framework is centralised, but operational delivery relies heavily on a private operator and informal recovery systems.

Legal and policy framework

Seychelles has embedded the polluter pays principle into the National Waste Policy, although practical implementation is limited. Extended Producer Responsibility policy has been approved but lacks operational regulations. The Environmental Protection Act (2016),

National Waste Policy (2018–2023), and the Solid Waste Masterplan (2020–2035) provide legal and strategic guidance.

The government imposes levies on selected products, notably through the PET bottle deposit-refund schemes - funded via levies on imported PET bottles

Despite these instruments, Seychelles lacks a comprehensive circular economy framework and strong legislative coverage for all waste streams.

Financial flows

Financially, Seychelles' waste-management system relies heavily on government funding, donor support, and targeted levies.

The government imposes levies on selected products, such as a PET bottle importer levy for DRS, and introduced the Tourism Environmental Sustainability levy in 2023 to support environmental rehabilitation. This levy applies per night, per visitor, across accommodation establishments. Initial revenue projections indicate over €5.6 million raised from August to December 2023, with an annual estimate of just below €13.25 million.

Despite these mechanisms, Seychelles continues to face financial constraints in waste management. Households generally do not contribute to collection costs, while businesses pay partially for waste transport and landfill disposal.

The system relies heavily on subsidies and donor financing, highlighting concerns over long-term sustainability (World Bank, 2022). Per capita spending on waste management is estimated at around €38 per inhabitant per year.

Operational flows

Household waste collection occurs at roadside communal bins. Recycling is limited primarily to PET bottles, aluminium cans, and scrap metal, with the informal sector playing a critical role.

The primary landfill on Mahé is expected to reach capacity this year. Annual waste generation is approximately 90,000 tonnes, with only 1% currently recycled. Plastics represent 13% of the total waste stream, and organic compostable waste constitutes 50%.

Victoria Port has a liner shipping connectivity index of 24.7/100, which limits efficient transport of recovered materials.

Preliminary assessment of EPR potential

Seychelles presents both opportunities and challenges for regional EPR. Centralised oversight and the existing PET deposit scheme provide a foundation for scaling EPR regionally.

However, the lack of comprehensive legal coverage, limited household participation, and reliance on subsidies are significant obstacles.

Operational capacity for sorting and recycling is low, and port limitations constrain regional movement of recovered materials.

A regional EPR initiative could support infrastructure development and standardisation of collection and recycling processes.

La Réunion : advanced EPR, high export reliance, zero waste ambition

Institutional framework

Waste management in La Réunion is organised through a combination of inter-municipal public cooperation establishments (EPCIs) and two waste treatment syndicates, SYDNE and ILEVA.

Municipalities are grouped into EPCIs, which are responsible for collection and initial treatment, while the syndicates manage waste treatment infrastructure and coordination. The Regional Council oversees the waste management plan (Plan for Waste Prevention and Management), consulting with state authorities, public bodies, private operators, professional organisations, and accredited associations.

This structured multi-level governance enables coordinated planning, although operational costs are high due to geographic constraints and reliance on external waste processing.

Legal and policy framework

EPR legislation in La Réunion dates back to 1992 and was revised in 2020 wiht the anti-waste and circular economy law (AGEC law), covering more than 20 waste streams.

The regional waste management plan promotes a zero-waste approach by 2030, with integrated strategies for recycling, composting, energy recovery, and landfill diversion. Enforcement mechanisms exist but are complemented by voluntary approaches.

The regulatory framework is mature, with clearly defined targets and monitoring processes.

Financial flows

Funding for waste management is largely self-financed through household taxes (TEOM/REOM) and fees for similar waste.

Annual per capita expenditure is not directly reported, but the system relies primarily on user fees and the support from the EPR scheme in place, with limited external subsidies.

Operational flows

Household plastic waste is estimated at 31,913 tonnes annually, representing approximately 15 % of the total domestic waste stream. Operationally, the island's waste management system relies heavily on energy recovery through incineration and the production of solid recovered fuel (RDF). Organic waste is treated via methanisation, while material recovery and recycling remain limited, accounting for roughly 7 % of total waste. Due to constrained local recycling capacity, plastics are predominantly exported off-island for processing.

La Réunion's regulatory and strategic framework supports these operations. The Plan Régional de Prévention et de Gestion des Déchets (PRPGD), approved in 2024, integrates circular economy objectives and establishes clear regional targets for waste reduction, recycling, and resource recovery (regionreunion.com). Complementing the PRPGD, the circular economy roadmap sets measurable objectives to promote recycling, composting, and reduction of landfill disposal.

Logistical constraints are relevant for the export of recovered materials. Le Port, the main port of La Réunion, provides international shipping capabilities, but the limited liner shipping connectivity index of 66.85/100, providing constrains the efficient transport of recyclables.

Preliminary assessment of EPR Potential

La Réunion has a well-developed institutional and legal framework, making it a strong candidate for implementing regional EPR schemes.

Operationally, limited local recycling and reliance on exports present challenges, while mature legislation and planning provide a foundation for harmonised regional initiatives.

Financially, fee-based systems and the EPR sheme support sustainability but may require integration with regional EPR funding mechanisms.

Union of the Comoros : draft policy, infrastructure and financing constraints

Institutional framework

The Union of the Comoros exhibits very limited institutional capacity for waste management. The institutional landscape is fragmented, with weak coordination between national and local levels, and the national waste agency (Agence Nationale de Gestion des Déchets, ANGD) is not yet fully operational and lacks structural funding.

Emerging initiatives indicate the government is beginning to lay the groundwork for improved governance. In 2025, ANGD convened inter-municipal workshops under the UNDP/GEF ISLANDS project to develop integrated waste management plans.

Despite these developments, collection coverage remains low, and municipalities face significant operational limitations due to insufficient technical, financial, and material resources. Coordination between stakeholders, particularly in remote or vulnerable areas, remains a significant challenge.

Legal and policy framework

The legal and regulatory framework for waste management is currently limited. While a broad environmental framework law exists (Decree No. 94/100/PR, 1994), specific legislation addressing solid and chemical waste management is underdeveloped.

No formal EPR scheme has been officially documented. Draft legislation for solid and chemical waste management is expected to address these gaps, potentially introducing the first EPR mechanisms in the country. Regional guidance from the Indian Ocean Commission supports development of integrated management frameworks, though enforcement, targets, and financing mechanisms remain incomplete.

Chemical and hazardous waste management is similarly constrained, with regulatory gaps and minimal operational protocols. UNDP and UNEP initiatives, including the Integrated Waste Management Alliance, are providing technical support to develop short- and medium-term strategies.

Financial flows

Financial resources allocated to waste management are extremely limited. Municipalities operate with minimal technical and material support, and user charges are very low. For example, localised pilot collection schemes report household fees of approximately €3 per month in small communities.

International donor funding is critical for basic collection and recovery activities. Projects such as the GEF/UNDP ISLANDS initiative provide substantial external support for institutional development, planning, and technical capacity building.

National government budgets for waste management remain extremely constrained, limiting the scope for infrastructure investment, particularly for landfills, sorting, and recycling facilities.

Operational flows

Operational capacity for waste management in Comoros is weak. Solid waste generation averages approximately 0.32 kg per capita per day, with an estimated 83 % inadequately managed through open dumping, burning, or informal disposal.

Formal collection covers less than 35 % of generated waste, with limited collection vehicles and restricted access to many areas. Informal recovery remains minimal, and no significant local sorting or recycling infrastructure exists.

Port infrastructure and logistics present additional constraints. The ports of Moroni and Mutsamudu have limited capacity, with Moroni's wharf measuring only 80 m and a depth of 4.5 m, resulting in reliance on anchorage and barging for cargo. Furtemore, these ports have a liner shipping connectivity index of 15.67/100, indicating limited connectivity for regional material flows.

These operational limitations, combined with low collection coverage and minimal recycling infrastructure, create significant challenges for effective waste management and regional coordination.

Preliminary assessment of EPR potential

While the Union of the Comoros has low institutional, financial, and operational capacity, it also presents an opportunity for the introduction of a regional EPR system from the outset.

Coordination through the Indian Ocean Commission and the potential for shared infrastructure with other islands could compensate for national limitations.

The main challenges include weak legal frameworks, limited budgets, and low collection coverage, all of which would require strong regional support.

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ANNEX IV – PRELIMINARY LIST OF STAKEHOLDERS TO ENGAGE FOR FEASIBILITY STUDY

Organisation / Institution	Country / Pays	Stakeholder type
Island Conservation society	Seychelles	Civil society organisations/community groups
Sustainable 4 Seychelles	Seychelles	Civil society organisations/community groups
Seychelles Island Foundation	Seychelles	Civil society organisations/community groups
Madagascar Biodiversity Fund	Madagascar	Civil society organisations/community groups
Precious Plastic Mauritius	Mauritius	Civil society organisations/community groups
We Recycle Mauritius	Mauritius	Civil society organisations/community groups
Association Pour La Protection de l'Environment - Banda Bitsi	Comoros	Civil society organisations/community groups
Synergie Jeunes	La Réunion	Civil society organisations/community groups
Agence National de gestion des déchets	Comoros	Member of the public-private platform / EPR working Committee/ National Focal Point
Ministère de l'Environnement Chargé du tourisme	Comoros	Member of the public-private platform / EPR working Committee/ National Focal Point
SOLYNVEST	La Réunion	Member of the public-private platform / EPR working Committee/ National Focal Point
Bourbon packaging	La Réunion	Member of the public-private platform / EPR working Committee/ National Focal Point

Ministère de l'Environnement et du développement durable	Madagascar	Member of the public-private platform / EPR working Committee/ National Focal Point
Ministère de l'Environnement et du développement durable	Madagascar	Member of the public-private platform / EPR working Committee/ National Focal Point
COMACAT	Madagascar	Member of the public-private platform / EPR working Committee/ National Focal Point
	Seychelles	Member of the public-private platform / EPR working Committee/ National Focal Point
Ministry of Environment , Solid Waste Management & Climate Change	Mauritius	Member of the public-private platform / EPR working Committee/ National Focal Point
CITEO	International	Technical Project Partners
CITEO	International	Technical Project Partners
IUCN, Senegal	Regional	Local and Regional Expert
IUCN Eastern & Southern Africa Regional Office	Regional	Local & Regional group/ Expert
IUCN	Regional	Local & Regional group/ Expert
IUCN	Regional	Local & Regional group/ Expert
IUCN	Regional	Local & Regional group/ Expert
IUCN (Eastern and Southern Africa)	Madagascar	Local & Regional group/ Expert
consultant	Mauritius	Local & Regional group/ Expert

MAUTOPIA	Mauritius	Local & Regional group/ Expert
EMS Consulting	Mauritius and Rodrigues	Local & Regional group/ Expert
ADEME Réunion (regional branch of France's national environmental agency, dedicated to supporting ecological transition efforts in Réunion and the broader Indian Ocean region)	La Réunion	National Ministries and agencies
Economic Development Board (EDB)	Madagascar	National Ministries and agencies
Ministry of Foreign Affairs	Mauritius	National Ministries and agencies
Ministry of Environment. Ministry of local government, Solid Waste	Mauritius	National Ministries and agencies
Association des Villes et Collectivités de l'Océan Indien	océan Indien	Local government representatives
Business Mauritius	Mauritius	Private sector/ business representatives
Mauritius Chamber of Commerce	Mauritius	Private sector/ business representatives
Data Labs	Mauritius	Private sector/ business representatives
BEM Recycling	Mauritius	Private sector/ business representatives
SOLYVAL (recycler)	Reunion	Private sector/ business representatives
SICR-Syndicat de l'Importation et du Commerce de la Réunion	Reunion	Private sector/ business representatives
RVE (Réunion Valorisation Environnement)	Reunion	Private sector/ business representatives
SICR-Syndicat de l'Importation et du Commerce de la Réunion	La Réunion	Regulatory bodies and enforcement agencies
	La Réunion	Public authorities
Direction générale des douanes de Moroni	Comoros	Regulatory bodies and enforcement agencies

Directeur régional des douanes et droits indirects de La Réunion	La Réunion	Regulatory bodies and enforcement agencies
Chargé de la coopération régionale - Direction régionale des douanes de la Réunion	La Réunion	Regulatory bodies and enforcement agencies
Direction générale des douanes de Madagascar	Madagascar	Regulatory bodies and enforcement agencies
The Customs Authorities	Mauritius	Regulatory bodies and enforcement agencies
The Customs Authorities	Seychelles	Regulatory bodies and enforcement agencies
World Wildlife Fund	International	Potential funders
FCDO	Regional	Potential funders
Landscape and Waste Management Agency	Seychelles	Regulatory bodies and enforcement agencies
ADEME La Réunion	La Réunion	Regulatory bodies and enforcement agencies
ADEME La Réunion	La Réunion	Regulatory bodies and enforcement agencies
UNDP Comores	Regional	Regulatory bodies and enforcement agencies
The Ocean Project	Seychelles	Civil society organisations/community groups
UNDP Mauritius and Seychelles		Potential funders
Project DECVAS	Comoros	Regulatory bodies and enforcement agencies
Ministry of Environment	Madagascar	Regulatory bodies and enforcement agencies
Ministry of Environment and National Development Unit	Mauritius	Regulatory bodies and enforcement agencies
Pollution Control, Department of Environment	Seychelles	Regulatory bodies and enforcement agencies
Managing director, Indian ocean Cluster	Maurice	Private companies
directeur d'agence	Maurice	Private companies

Président	Maurice	Private companies
Ingénieur territorial	La Réunion	Collectivité territoriale
Coordinatrice ISLANDS PROJECT océan Indien	Comoros	Project
Senior Solid Waste Management Expert, Resources & Waste Advisory Group	Allemagne	Project
Chef de projet	Maurice	COI

ANNEX V – READINESS ASSESSMENT TEMPLATE

Objectives

This assessment identifies the readiness of SIDS and remote regions to implement such framework. It helps SIDs and remote area that would like to endorse a regional EPR vision to evaluates critical enabling conditions, identifies institutional and operational gaps, and outlines a practical roadmap toward piloting and scaling a regional and harmonised EPR system.

Readiness assesment table including criteria and enabling actions

Assessment dimension	Criteria to assess readiness	Key enabling actions
Leadership and governance	▪ Is there political support for EPR? ▪ Are there designated government champions or focal points? ▪ Is a regional instituationnal framework or coordination mechanism in place or planned?	▪ Establish a regional EPR task force or Steering Committee ▪ Appoint national focal points in each participating country ▪ Use regional forum/institutionnal framework to align EPR priorities
Institutional infrastructure	▪ Do national public authorities have mandates to enforce or run EPR scheme ? ▪ Is there technical or staffing capacity for an EPR administration? ▪ Are there coordination mechanisms wihtin and accross the SIDs and remote area ?	▪ Conduct institutional capacity gap assessments ▪ Develop regional training programs for regulators and waste managers ▪ Set up a regional technical support unit or knowledge hub
Legal and policy frameworks	▪ Are there national laws or regulations that include EPR provisions? ▪ Is there flexibility to adopt or adapt a regional model law? ▪ Do SIDs and remote area have legal mechanisms to hold producers accountable?	▪ Draft the regional EPR agreement by taking into account the national legal frameworks of the SIDs and remote area that will be involved in the regional EPR framework ▪ Provide technical support for legal harmonisation and implementation

Assessment dimension	Criteria to assess readiness	Key enabling actions
		▪ Align EPR with existing national waste legislation and policies
Planning and management	▪ Is EPR included in national or local waste plans? ▪ Are there strategic goals or roadmaps related to circular economy? ▪ Are roles and responsibilities defined across national agencies/authorities ?	▪ Integrate EPR into national waste and resource management plans ▪ Develop a regional roadmap and planning toolkit ▪ Conduct workshops to clarify roles and responsibilities
Sustainable finance	▪ Are there existing or proposed financing mechanisms for waste recovery? ▪ Is there already public or bilateral/multilateral public funds on waste management at the national/regional scale ? ▪ Is the private sector involved in cost-sharing or PRO development? ▪ Are economic instruments (e.g., fees, deposits) being considered?	▪ Develop cost recovery models including producer fees and eco-modulation ▪ Design incentives for recycling infrastructure and reuse markets - Explore blended financing models (public-private-donor)
Stakeholder engagement and coalitions	▪ Are producers, importers, and retailers engaged in waste policy discussions? ▪ Are there civil society or industry platforms supporting EPR? ▪ Is there public understanding of EPR principles?	▪ Map and engage key stakeholders across the value chain - Establish national PROs/agencies in charge of the EPR scheme ▪ Run education and advocacy campaigns to build support

Assessment dimension	Criteria to assess readiness	Key enabling actions
Data, monitoring and performance	▪ Is waste data collected regularly and in a standardised format? ▪ Are there mechanisms for tracking product flows and compliance? ▪ Are there indicators or benchmarks for EPR performance?	▪ Develop a regional data reporting framework with standard indicators ▪ Build or integrate a digital compliance monitoring system ▪ Support SIDs and remote are in conducting baseline assessments
Pilot readiness	▪ Are there SIDs or remote area willing to lead a pilot? ▪ Is there baseline data or infrastructure in place for implementation? ▪ Are producers engaged and supportive in the pilot area?	▪ Identify high-readiness SIDs and remote are within the region for pilot implementation ▪ Provide technical and financial support for pilot launch ▪ Use pilot results to refine the regional model and scale up

Three year initial roadmap and timeline for the development of a regional EPR framework for SIDs and remote area

Phase	Timeline	Milestones	Key activities
First phase : foundation	*Months 0–6*	**Stakeholder mobilisation**	▪ Identify and convene key regional, national, and local stakeholders ▪ Conduct stakeholder consultations and engagement ▪ Develop stakeholder engagement plan
		baseline assessment	▪ Conduct harmonised gap analyses across SIDS and remote areas ▪ Compile SIDs and remote area readiness profiles ▪ Identify common barriers and enabling conditions

Phase	Timeline	Milestones	Key activities
		Coordination structure	▪ Form regional EPR task force (that will transit to the regional EPR scheme administrator for the next phases of the project) ▪ Appoint technical secretariat to support coordination ▪ Draft terms of reference for the future regional scheme administrator
Second phase : framework design	*Months 6–12*	**Legal drafting**	▪ Develop regional EPR agreement and model legislation based on the regional institutionnal framework or any regional forum ▪ Conduct legal reviews and stakeholder validation workshops ▪ Align with existing national and regional policies
		Financial model	▪ Assess financial capacity and funding prospects ▪ Design producer fee structures and cost recovery mechanisms ▪ Identify funding sources (national budgets, donors, private sector)
		Pilot selection	▪ Define readiness criteria for pilots ▪ Select 2–3 pilot territories ▪ Continue the engagement with non-pilot territories via the task force
Third phase : pilot Implementation	*Months 12–24*	**Policy implementation**	▪ Support legal enactment of pilot instruments ▪ Register producers/importers ▪ Establish national PROs/entities in charge of EPR
		Fee structure	▪ Finalise fee structure ▪ Identify and register obliged entities ▪ Set reporting and payment mechanisms
		Infrastructure support	▪ Upgrade collection, sorting, and shipping infrastructure ▪ Develop waste management hubs and logistics systems

Phase	Timeline	Milestones	Key activities
			▪ Pilot inter-island logistics partnerships to developd the waste management hubs
		Monitoring framework	▪ Deploy digital monitoring and reporting system ▪ Define KPIs and performance benchmarks ▪ Establish real-time dashboards with stakeholder feedback
Fourth phase : evaluation and scale-up	*Months 24–36*	**Performance review**	▪ Conduct pilot evaluations (economic, environmental, operational) ▪ Gather stakeholder feedback ▪ Adjust framework and systems based on evaluation results
		Regional expansion	▪ Prepare and implement expansion plan to additional SIDs and remote area engaged since the beginning of the adoption of the regional EPR agreement ▪ Provide onboarding and technical assistance for new participants ▪ Support national legal adoption
		Legal harmonisation	▪ Finalise regional legal alignment and mutual recognition for the regional EPR framework ▪ Support cross-border coherence of EPR obligations and national PROs/entities in charge of the EPR scheme operations ▪ Facilitate legal updates across jurisdictions

About 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 small coastal countries, supporting a just transition to a future freed from plastic pollution.

To find out more, please visit: **www.commonseas.com**

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