Swedish International Centre for Local Democracy

POLICY BRIEF 35

BRAND AUDITS:

A tool for local governments to foster a just and plastic-free transition

Executive summary

- County governments carry the costs of plastic pollution but lack the tools to enforce producer accountability.
- Brand audits provide a cost-effective, citizen-led method to support EPR enforcement.
- Participatory audits strengthen local democracy, transparency, and inclusion of waste pickers.
- Institutionalizing brand audits can advance a just and plastic-free transition.

Authors:

Dorothy Otieno [1] · Griffins Ochieng [1] · Ledoner Okeyo [1] · Marietta Anzazi [1] · Sherphine Kochiyo [1] · María José Zapata Campos [2 & 3] · Clara Orstadius [3] · Patrik Zapata [2] · Richard Kiaka [1]

[1] *Centre for Environment Justice and Development (CEJAD)*
[2] *University of Gothenburg (GU)*
[3] *Swedish International Centre for Local Democracy (ICLD)*

Members of Mwakirunge Waste Pickers Group recovering recyclable waste at the Mwakirunge dumpsite in Mombasa.

Table of Contents

Cover photo: Research team during a plastic brand audit at a public beach in Mombasa in 2024

Photo credit (all photos): CEJAD

Introduction

Plastic pollution is often blamed on consumer behavior, with focus on visible post-consumption waste[1]. Producers remain largely invisible. This overlooks the systemic causes rooted in production and packaging practices. The primary responsibility for solid waste management is borne by local governments, yet plastic pollution continues to strain their budgets, undermine basic service delivery, and reduce residents' quality of life. The costs are not just financial – accumulated plastic waste also degrades urban and rural environments, impairs sanitation infrastructure, and poses public health risks. In coastal counties, plastic pollution directly threatens marine ecosystems such as coral reefs, mangroves, and fisheries, which are critical to local food systems and the tourism sector. Since tourism is a key revenue source for many counties, this environmental degradation translates into lost income and missed development opportunities.

Kenya has emerged as a regional leader in plastics regulation, having banned plastic bags and recently gazetted Extended Producer Responsibility (EPR) regulations that reinforce the "polluter pays" principle.[2] EPR obligates producers to manage waste generated from their products. Yet enforcement remains weak, and local governments lack reliable data to trace pollution back to producers.

In this context, **Brand Audits** have emerged as a powerful tool to bridge this accountability gap by generating evidence of who is polluting, what types of plastics dominate, and how local communities are impacted.

Members of Nuru Youth Development Forum in at their wast transfer station in Mombasa. They are sorting waste to recover recyclables. They then pack the residual waste in to gunny bags as required by the county government.

[1] *Njeru, 2006; Opondo, 2004*
[2] *Katunge, 2019; Njuguna, 2018*

What is plastic brand audit?

A plastic *brand audit* is a participatory citizen science methodology used to systematically document and analyze branded plastic waste to identify and hold accountable the corporations responsible for or contributing to plastic pollution. Brand audits involve working with local communities in the collection, sorting, and categorization of plastic debris, based on key attributes such as product type, material composition, brand name, and manufacturer origin.[3] For county governments, brand audits offer a cost-effective way to:

- Identify major contributors to plastic waste
- Monitor trends in plastic packaging and product types
- Plan waste recovery systems, including Material Recovery Facilities (MRFs)
- Mobilize citizen engagement and environmental awareness, fostering inclusive and evidence-based decision making at the grassroots level.

Importantly, brand audits highlight systemic injustices, such as the under-recognition and underpayment of waste pickers, who collect 60% of recycled plastics globally (Lau et al., 2020), and the unequal distribution of responsibility across the plastic lifecycle.

Methodology

This brief is based on a plastic brand audit conducted across 19 beaches in Mombasa County during International Coastal Cleanup Day 2024, with findings validated in May 2025 through a multi-stakeholder dialogue involving waste pickers, civil society, county officials, and experts. The audit combined participant training, on-site waste collection and sorting aided by visual reference catalogues, and post-audit analysis to identify pollution trends by product type, material, and brand, generating practical evidence to support accountability and policy action. These events were conducted within a larger research project on a just transition in plastic waste governance[4].

[3] *Break Free from Plastic, 2022*

[4] *See ICLD Research Report 34 Toward a Just Transition in Plastic Governance: Grassroots Waste Pickers, Participatory Spaces, and Environmental Democracy in Kenya*

Findings and implications

Plastic waste by product use and material type

Food packaging dominated the waste stream, accounting for **about two-thirds (≈67%)** of all plastic items collected. These were primarily **single-use wrappers, sachets, and containers**, which are discarded shortly after use but persist in the environment. While such packaging is often justified for food safety and convenience, it is a major driver of marine pollution, microplastic contamination, and potential human health risks.[5] Without relevant policies to reduce single-use packaging and support safer alternatives, these impacts will intensify in rapidly urbanising areas.

By material type, **PET plastics**, mainly single-use beverage bottles, were the most common, making up **nearly 29%** of all items. Although PET is recyclable and valued by waste pickers[6], its widespread presence in the environment points to gaps in collection systems and weak enforcement of Extended Producer Responsibility (EPR). A significant share of plastics could not be identified due to poor labelling, undermining traceability, increasing public health risks, and limiting effective EPR enforcement.[7]

Members of the Kisiwani Conservation Network conducting an environmental cleanup to remove an illegal dumpsite in Mombasa in 2024.

[5] *Marsh & Bugusu, 2007; Robertson, 2013; Silva et al., 2021; van Sebille et al., 2015 ; Geueke et al., 2018; Groh et al., 2019*
[6] *Geyer et al., 2017*
[7] *Groh et al., 2019; Geueke et al., 2018*

Plastic layering, producer responsibility, and waste picker livelihoods

Most plastic waste collected consisted of **single-layer plastics (≈72%)**, but over **one-fifth (≈20%) was multilayer packaging, which is largely non-recyclable** and unlikely to have viable recycling solutions in the near term.[8] Because multilayer plastics have little or no market value, they are left to accumulate in landfills and marine environments, threatening biodiversity and coastal economies. Their presence points to the need for specific EPR measures to restrict or phase out multilayer packaging.

Brand analysis identified both imported and domestic products as major contributors to plastic pollution. The prominence of imported brands highlights the need to align EPR enforcement with trade and import controls, while the dominance of Kenyan brands provides clear entry points for county-level accountability. At the same time, **around 35% of items were unbranded or poorly labelled**, severely limiting traceability and weakening EPR enforcement. Mandatory labelling standards and a national packaging database would significantly improve producer accountability and cost recovery.

The audit also revealed **systematic underpayment of waste pickers**. Although thousands of plastic items were collected, their low weight resulted in minimal compensation under weight-based payment systems. This fails to reflect the time, skill, and environmental services waste pickers provide, particularly for low-value plastics such as sachets. Advancing a just transition requires **fair remuneration frameworks, safer working conditions, and a shift in responsibility from consumers to producers.**[9]

Brand audits support this transition by **democratising data production, including marginalised waste pickers, and generating locally grounded evidence** that counties can use to inform enforcement and national policy reform.

[8] *Soares et al., 2022*
[9] *Groh et al., 2019; Geueke et al., 2018*

Policy recommendations

The following policy recommendations outline concrete actions that national and county governments can take to institutionalise brand audits and advance a just, inclusive, and locally driven transition away from plastic dependency.

For National Government

1. Mandate standardised labelling for all plastic packaging to improve traceability and EPR enforcement.
2. Restrict or phase out multilayer plastics with no viable recycling pathways.
3. Strengthen packaging regulations to reduce single-use plastics and promote sustainable alternatives.
4. Establish a national plastic packaging database to support producer accountability and cost recovery under EPR.

Francis Mtawale of Safisha Timbwani Yetu Volunteers Group wearing a personal protective equipment provided by WWF-Kenya

For County Governments

1. **Institutionalise brand audits:** Integrate plastic brand audits into routine county waste monitoring to identify major polluters, track EPR compliance, and inform local waste reduction strategies.
2. **Partner with waste pickers and communities:** Engage waste pickers and community groups in data collection and sorting to improve data quality, strengthen participation, and enhance inclusive waste governance.
3. **Ensure fair compensation for waste pickers:** Work with national authorities and Producer Responsibility Organisations (PROs) to develop compensation frameworks that reflect labour, time, skill, and environmental services—not weight alone.
4. **Build county-level EPR capacity:** Train officials, improve legal clarity, host public accountability forums, and use brand audit data to engage producers operating within county jurisdictions.
5. **Promote source separation:** Involve waste pickers in household and business-level collection and awareness campaigns to improve separation at source and recovery rates.
6. **Enable waste picker innovation and upgrading:** Provide training, funding, and linkages to innovation hubs, schools, and technical colleges to support sorting, pre-processing, reuse, upcycling, and refill-based enterprises.
7. **Reduce single-use plastics in local economies:** Introduce county policies and incentives—such as eco-certification schemes—to steer tourism and other local businesses away from single-use plastics.

Members of Kipevu Waste Managers at their office.

Concluding note for policy makers

County governments bear the costs of plastic pollution but lack effective tools to hold producers accountable. Brand audits offer a practical, citizen-led mechanism to support Extended Producer Responsibility (EPR) enforcement by identifying polluters and generating actionable local data.

By involving waste pickers and communities, brand audits strengthen accountability, inform planning of recovery systems, and support enforcement measures such as penalties and eco-taxes.

Acknowledgments

We thank waste pickers, community volunteers, and the support of Mombasa County's Department of Environment and Solid Waste Management.

References:

Break Free From Plastic. (2022). BRANDED: Five Years of Holding Corporate Plastic Polluters Accountable. Break Free From Plastic. https://www.breakfreefromplastic.org/brandaudit2022/

Geueke, B., Groh, K., & Muncke, J. (2018). Food packaging in the circular economy: Overview of chemical safety aspects for commonly used materials. Journal of Cleaner Production, 193, 491–505. https://doi.org/10.1016/j.jclepro.2018.05.005

Geyer, R., Jambeck, J. R., & Law, K. L. (2017). Production, use, and fate of all plastics ever made. Science Advances, 3(7), e1700782. https://doi.org/10.1126/sciadv.1700782

Groh, K. J., Geueke, B., Martin, O., et al. (2019). Overview of known plastic packaging-associated chemicals and their hazards. Science of the Total Environment, 651, 3253–3268. https://doi.org/10.1016/j.scitotenv.2018.10.015

Katunge, K. (2019). The effectiveness of the plastic bag ban in Kenya. Journal of Environmental Law and Policy, 5(1), 45–58.

Marsh, K., & Bugusu, B. (2007). Food packaging—roles, materials, and environmental issues. Journal of Food Science, 72(3), R39–R55. https://doi.org/10.1111/j.1750-3841.2007.00301.x

Njeru, J. (2006). The urban political ecology of plastic bag waste problem in Nairobi, Kenya. Geoforum, 37(6), 1046–1058. https://doi.org/10.1016/j.geoforum.2006.03.003

Njuguna, A. (2018). Kenya's ban on plastic bags: An environmental triumph or a social dilemma? African Environmental Review, 12(2), 78–89.

Opondo, L. (2024). Reframing urban waste in Kenya: Informal waste work and contested spaces of responsibility. African Journal of Urban Studies, 3(1), 22–37.

Robertson, G. L. (2013). Food Packaging: Principles and Practice (3rd ed.). CRC Press.

Silva, A. L. P., Prata, J. C., Walker, T. R., Duarte, A. C., Soares, A. M. V. M., & Rocha-Santos, T. (2021). Increased plastic pollution due to COVID-19 pandemic: Challenges and recommendations. Chemical Engineering Journal, 405, 126683. https://doi.org/10.1016/j.cej.2020.126683

Soares, C. T. M., Ek, M., Östmark, E., Gällstedt, M., & Karlsson, S. (2022). Recycling of multi-material multilayer plastic packaging: Current trends and future scenarios. Resources, Conservation and Recycling, 176, 105905. https://doi.org/10.1016/j.resconrec.2021.105905

van Sebille, E., Wilcox, C., Lebreton, L., Maximenko, N., Hardesty, B. D., van Franeker, J. A., & Law, K. L. (2015). A global inventory of small floating plastic debris. Environmental Research Letters, 10(12), 124006. https://doi.org/10.1088/1748-9326/10/12/124006

Wilson, D. C., Velis, C., & Cheeseman, C. (2009). Role of informal sector recycling in waste management in developing countries. Habitat International, 33(1), 1–9. https://doi.org/10.1016/j.habitatint.2008.10.006

ICLD Swedish International Centre for Local Democracy