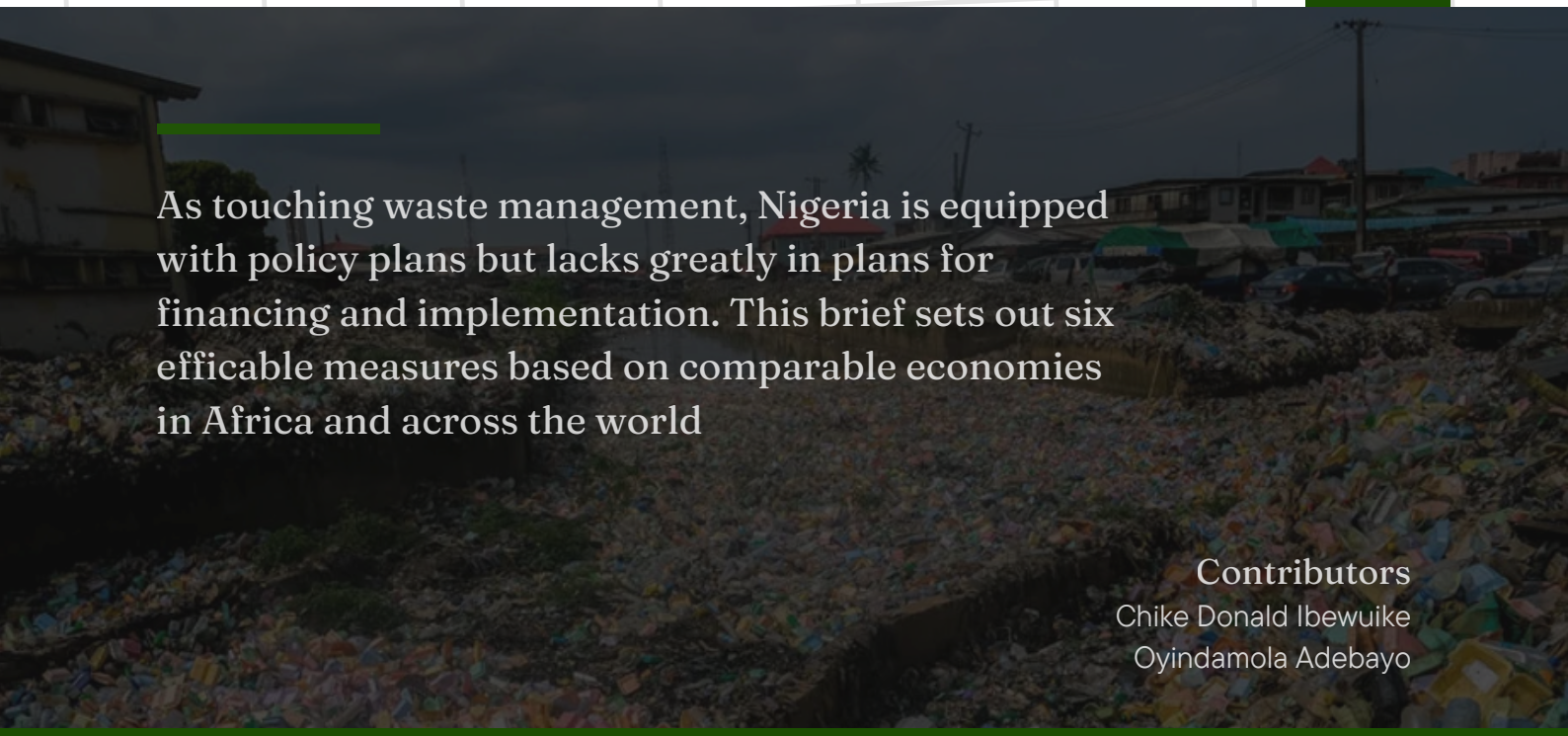
June 2026

CLOSING THE GAP

Practical, Proven Solutions to Nigeria's Waste Crisis



As touching waste management, Nigeria is equipped with policy plans but lacks greatly in plans for financing and implementation. This brief sets out six efficable measures based on comparable economies in Africa and across the world

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Evidence. Clarity. Action.

FOR POLICYMAKERS & PUBLIC SERVANTS SERIES

Table of Contents

Executive Summary

Nigeria has policies. It needs the plumbing; and someone to pay for it.

When it comes to waste management and recycling, Nigeria is far from clueless on the topic. It has national policies, an Extended Producer Responsibility programme, a circular-economy roadmap and, in the last few years, has implemented bans on several pollutants. Despite all of this, what the nation lacks is the **resources required to operationalize the available policy machinery.** This can be expressed in; waste collection that involves citizens, waste management financing that does not fall primarily on the state, integration of the workforce that already does the collecting, and policy enforcement that follows the gazettes. This brief sets out six measures with track records in comparable economies, puts illustrative numbers on what they cost and who pays, names the politics that will decide whether they happen, and proposes a sequence for adopting them.

KEY POINTS

- **The core problem is collection and financing, not ambition.** In Lagos only about 40% of waste is collected and roughly 13% recycled. You cannot recycle what you never collect. Thus, every measure here is weighted toward collecting the material and paying for that collection.
- **Materialization of Extended Producer Responsibility and Financial Governance.** Done properly, as in Germany and now South Africa, two cases we will explore in this brief, producer fees rather than the national treasury pay for collection and recycling. Nigeria's voluntary version under-delivers because free-riders are not compelled; the fix is mandatory, enforced, and (critically) a fund governed so it cannot be captured.
- **Formalise the waste pickers Nigeria already relies on.** Pune, Bogotá and Belo Horizonte turned informal collectors into a licensed, paid backbone, cutting disposal and cost. This can be Nigeria's single highest-impact move. However, it must be gender-equitable and safe, since the workforce is largely women and migrants.
- **Treat the sachet as the hard case, not a footnote.** The pure-water sachet is Nigeria's signature waste stream, but it is low-value film with no real recycling market, bought by the poorest. A German-style consumer deposit does not transfer to it. Sachets need producer-funded buy-back plus deliberate end-market creation, which is exactly why Lagos excludes them from its ban and routes them to EPR.
- **Scale what already works here.** Wecyclers, RecyclePoints, Scrapays, Chanja Datti and Polysmart have proven reward-for-recycling and processing in Nigeria. Fund them; don't reinvent them.
- **Bans are the backstop, not the strategy, and they leak across state lines.** Rwanda and Kenya show bans work with enforcement and affordable alternatives; Uganda shows what happens without them. Because waste is largely a state matter, a single-state ban simply pushes production next door — hence products already stamped "NOT FOR LAGOS." Harmonisation matters.

2.5M	<12%	~40%	50–60M
tonnes of plastic waste a year	of plastic is recycled	of Lagos waste is collected	sachets dumped daily in Lagos

This brief draws on peer-reviewed studies, UN and World Bank assessments, recent reporting through 2026, and the documented experience of Rwanda, Kenya, South Africa, Germany, Norway, Lithuania, India, Colombia, Brazil and Nigeria's own social enterprises. Cost figures are clearly-labelled illustrative estimates to show orders of magnitude, not a costing. Full sources and notes are at the end.

01 The problem: a collection-and-finance crisis

Nigeria generates more than **2.5 million tonnes of plastic waste every year**, ranking among the world's largest plastic polluters; over **70% of it leaks into drains, waterways and landfills**, and **less than 12% is recycled**. The picture is sharpest in Lagos. The megacity produces on the order of **9,000–13,000 tonnes of waste a day**, of which roughly **40% is formally collected** and only about **12% recycled**. Its signature waste stream is the pure-water sachet: UN researchers estimate **50–60 million used sachets are discarded on Lagos streets daily**. Lagos alone contributed an estimated 870,000 tonnes of plastic waste in 2024.

Figure 1a · Where Nigeria's plastic ends up *Sources: USAID; World Bank / WACA. Chart: SimpleFix Nigeria*

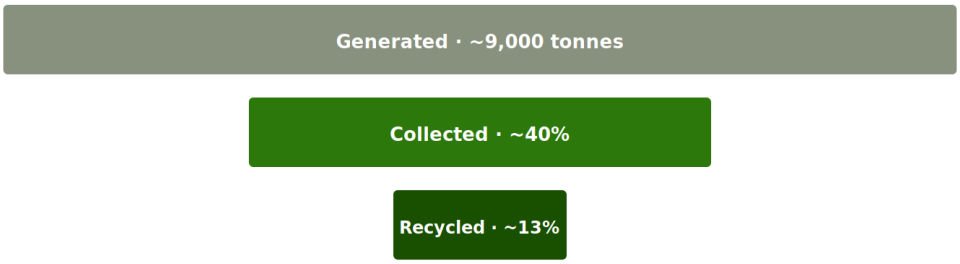

Figure 1b · Lagos, every single day; the collection funnel *Source: SEDIN/GIZ value-chain assessment; RecyclePoints. Widely-cited estimates. Chart: SimpleFix Nigeria*

The damage compounds across three fronts.

a. **Flooding and health:** plastic-choked drains are a primary driver of the urban flooding that recurs across Lagos and other cities, with the st
b. ding water and uncollected waste that follow carrying direct disease risk.
c. **Climate:** rotting organic waste in open dumpsites emits methane, and the widespread open burning of refuse releases carbon and toxic pollutants.
d. **Economy:** Nigeria forgoes the value in its waste while remaining one of Africa's largest importers of virgin plastic resin, with around 70% of resin imported. Material that could feed local recyclers is instead buried, burned or washed out to sea.

THE CORE INSIGHT

Recycling rates cannot rise while most waste is never collected, and collection will not happen at scale until someone other than a cash-strapped state pays for it. Every solution that follows is therefore weighted toward two things: **fixing collection** and **financing it.**

02 What Nigeria already has and why it stalls

It is a common misconception that Nigeria has no waste policy. In reality, the architecture is substantial, though largely unenforced.

Our framework on paper

- **National Policy on Plastic Waste Management (2020) and National Policy on Solid Waste Management (2020):** frameworks for reduction, recycling and producer responsibility, linked to the Basel Convention, the SDGs and the UN climate process.
- **Extended Producer Responsibility (EPR) programme**, operated by National Environmental Standards and Regulations Enforcement Agency(NESREA) since its operational guidelines of 2014, placing life-cycle responsibility on producers under the Polluter-Pays Principle, with Producer Responsibility Organisations such as Food Beverage Recycling Alliance (FBRA) for packaging. In practice it has run largely as a *voluntary* scheme, which is the root of its weakness.
- **National Environmental (Plastic Waste Control) Regulations, 2023**, a National Circular Economy Roadmap, and a National Waste Marketplace to trade recoverable materials.
- **Stated bans and dates:** single-use plastics out of federal offices (2024); a nationwide ban on bags, cutlery, straws and styrofoam targeted from January 2025; and a full styrofoam phase-out by December 2028. Lagos State began full enforcement of its own single-use-plastic and styrofoam ban on 1 July 2025.

Where it breaks down

As ambitious, and as revolutionary this policy framework is, where it breaks down is in financing and delivery. The nationwide ban targeted for January 2025 has still not materialised as a federally-enforced reality beyond government offices over a year later. Lagos is the exception that proves the point: a year into enforcement it has stepped up markedly, by mid-2026 the state reported sealing 239 facilities, prosecuting over 8,000 environmental offenders in a year, and recovering some 137,500 kg of PET in 2025. Enforcement, in other words, works **where there is political will and capacity**. But two things remain true even in Lagos; i.) the ban deliberately **excludes PET bottles and water sachets (**the hardest streams) routing them to EPR instead, because there is no drop-in alternative, and; ii.) uneven action across states is already producing leakage, with products stamped "NOT FOR LAGOS" manufactured for sale next door.

Four structural weaknesses recur nationwide:

a. **collection coverage** reaches well under half the population;
b. **financing** for collection and recycling falls on states rather than producers;
c. **the informal sector** that does most of the actual collecting is neither recognised nor supported, and;
d. **enforcement capacity, data and coordination** are thin. The regional lesson is blunt: a gazette is not a result — Uganda announced plastic-bag bans on four separate occasions without enforcing any of them.

REFRAME FOR POLICYMAKERS

Nigeria's next move is not another policy document. Rather, it is to build and fund the **delivery system** (collection, finance, enforcement, coordination) that the existing policies assume but do not create.

03 A solutions framework: six measures that work

The measures below are ordered by **dependency and feasibility**. Formalising waste pickers is the single highest-impact intervention, but it is placed second because it cannot be financed at scale until EPR supplies the money. So EPR comes first as the **enabling precondition**. None of the six is hypothetical; each has a documented track record in a comparable economy, and several are already proven on Nigerian soil. Figure 2 maps them on impact against feasibility.

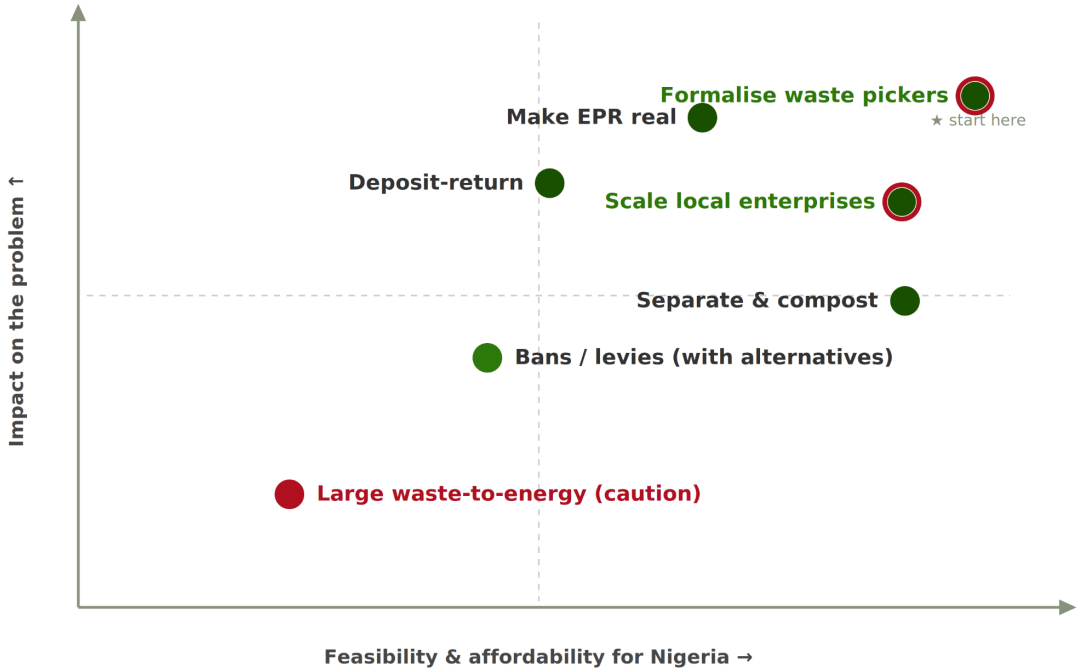

Figure 2 · Where to focus — impact vs. feasibility for Nigeria *SimpleFix Nigeria assessment. Positions are indicative, not precise scores.*

01 Make EPR real: the financing engine

MODELS **Germany · South Africa · EU · already in Nigerian law**

Extended Producer Responsibility makes the companies that make and sell packaging pay to collect and recycle it. Nigeria has EPR on paper; the task is to make registration, fees and targets **mandatory and enforced**, with the revenue ring-fenced to fund collection, buy-back and sorting — and the fund governed so it survives contact with Nigerian institutions (see Section 05). The money flow is shown in Diagram A.

EVIDENCE IT WORKS

In Germany, EPR (the "Green Dot") combined with deposits helped lift packaging recycling to **67.9% in 2021**. On this continent, **South Africa made EPR mandatory in 2020/21**, shifting end-of-life cost onto producers. Kenya built producer obligations directly into its bag ban rather than relying on prohibition alone.

What it takes

- Mandatory producer registration with NESREA;
- eco-fees set by material; recycled-content and collection targets with published compliance;
- independent third-party verification of the tonnages producers claim (a notorious EPR failure mode is fraudulent over-reporting), and;
- a transparent, audited fund that actually pays collectors and recyclers.

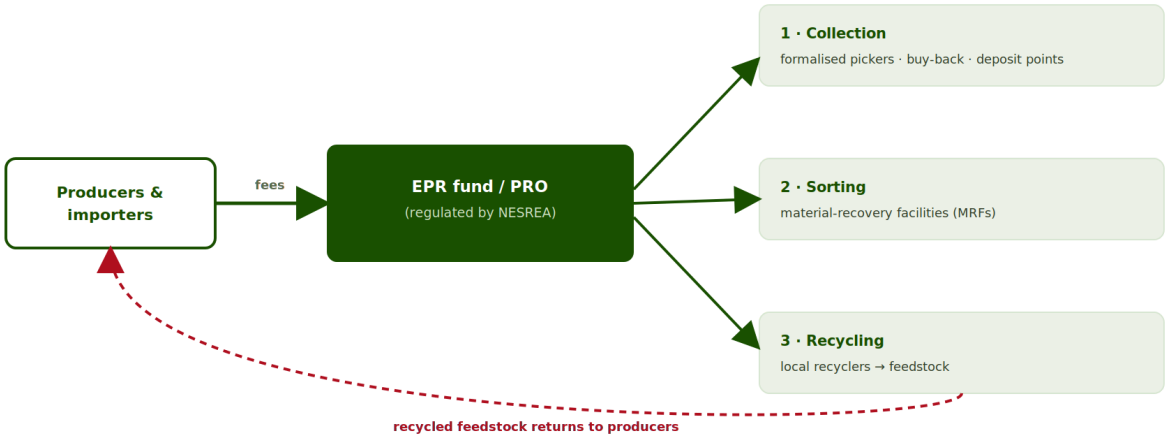

Diagram A · How EPR money should flow

02 Formalise the waste pickers: highest impact for Nigeria

MODELS **India (Pune) · Colombia (Bogotá) · Brazil · South Africa**

In most Nigerian cities, cart-pushers and scrap collectors *are* the collection system. Rather than ignore or displace them, the proven approach is to organise them into cooperatives, license them, equip them and pay them. This turns the already existing, albeit poorly organized workforce into an accountable, financed backbone. As a bonus, organised pickers clear drains and cut emissions, directly easing Lagos's flooding.

EVIDENCE IT WORKS

Pune, India: the SWaCH cooperative reaches about **95% of households**; the city issues ID cards while members collect user fees and earn roughly **₹6,000–8,000 a month** versus ₹4,000–5,000 for unorganised pickers; integration cut waste-to-disposal by **over 20%** and cost the city far less than private contractors. **Bogotá, Colombia:** a 2009 Constitutional Court ruling recognised pickers' right to collect and recycle; they now bid on municipal contracts. **Belo Horizonte, Brazil:** cooperatives have been paid service providers since 1993. **Cape Town** shows the African version, where buy-back centres link the formal and informal economies.

What it takes

- Legal recognition that gives cooperatives standing;
- ID and basic protective equipment;
- integration with state agencies such as LAWMA, and;
- financing (earmarked funds and subsidised infrastructure) which EPR can supply.

DESIGN IT FOR THE PEOPLE WHO DO THE WORK

Unlike Pune where the cooperative workforce is roughly 80% women, waste-picking in Nigeria is done overwhelmingly by men, and disproportionately by young migrants who commute in from slums and satellite towns. Women are present, but tend to be confined to the lowest-value, most hazardous and least-paid niches (sorting and dirty residue at dumpsites rather than the higher-value PET and metals) and are largely shut out of ownership and supervisory roles. In non-organised settings men consistently out-earn women; in cooperatives that gap narrows. Formalisation that ignores this can entrench the inequity or be captured by the (mostly male) aggregators and middlemen who skim the margin. So build in deliberate, equal cooperative membership and leadership for women from the outset rather than assuming inclusion will follow; transparent, fair buy-back prices paid directly to the collector, not the middleman; and occupational health; gloves and boots, sharps and hazardous-waste protocols, tetanus and hepatitis vaccination, and protection from open-burning sites. Recognition without safety, fair pay and active inclusion is not formalisation.

03 A deposit-return scheme: bottles first — and a real plan for sachets

MODELS **Norway · Germany · Lithuania**

Add a small, refundable deposit to PET bottles, redeemable at vendors, machines or collection points. It is the most effective container-collection mechanism known, and it pairs naturally with Lever 2 — in Germany, informal "deposit collectors" already clear the streets for the refund. Diagram C shows the loop.

EVIDENCE IT WORKS

Germany recovers over **98%** of containers and **Norway 92%+**; **Lithuania** jumped from a return rate below 34% to over 90% after introducing a deposit. Schemes succeed on three design rules: a deposit large enough to be worth returning, convenient and well-distributed return points, and a take-back duty on retailers.

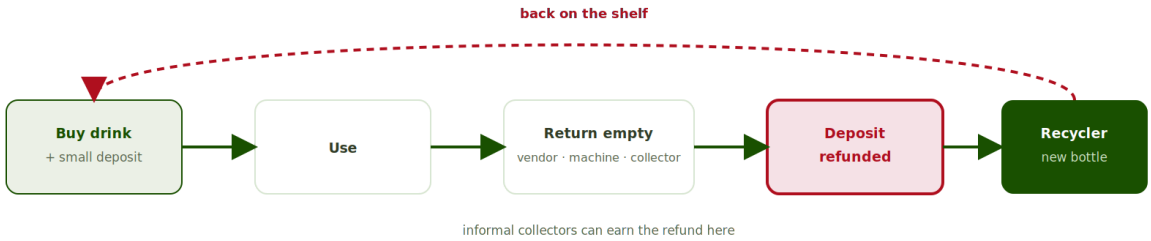

Diagram C · The deposit-return loop

The sachet is a different problem that deserves an honest answer

The brief's hardest target is the pure-water sachet, and it is tempting to extend a bottle deposit straight to it. That would be a mistake, for four reasons:

Material	A sachet is a thin multilayer/LDPE (Low-Density Polyethylene) *film*, not a rigid PET bottle. It is low-value, hard to recycle, and there is barely a domestic end-market for the recovered film. So even once collected, the question "what happens to it?" has no easy answer.
Economics	A sachet retails for roughly ₦20 - ₦50 and is bought overwhelmingly by the lowest-income consumers. A deposit large enough to drive returns (say ₦ 4–10) is **20–50% of the price** — a steeply regressive burden on exactly the people who can least afford it.
No precedent	Every deposit-return success cited above (Germany, Norway, Lithuania) is rigid PET, glass or aluminium with reverse-vending machines and mature recycling markets. There is **essentially no proven consumer deposit-return scheme for flexible water sachets** anywhere. The evidence does not transfer.
The regulator agrees	Tellingly, Lagos **excludes sachets (and PET) from its single-use-plastic ban** and routes them to EPR, which in a sense is a tacit admission that there is no drop-in substitute and that the answer must be financed collection, not prohibition.

THE REALISTIC PATH FOR SACHETS

Collect them with producer money, and build the market for the material, not pretending a consumer deposit will fix it. Concretely:

(1) Producer-funded buy-back at scale. RecyclePoints already buys back pure-water sachets; fund it through EPR and replicate it citywide. A small per-unit producer levy (a few kobo per sachet — negligible to the consumer, material in aggregate) can be earmarked specifically to sachet collection.

(2) Deliberate end-market creation. Use offtake guarantees and patient capital to stand up uses for recovered film — recycled film, plastic-to-board and composite products, road-binder pilots, and carefully-appraised controlled pyrolysis (treated with the same scepticism as incineration, below).

(3) Design and format change. Push producers toward mono-material, recyclable films; pilot return-to-vendor and refill models; and reduce the sheer sachet count by making larger formats and safe piped/dispensed water cheaper.

(4) A consumer deposit only later, if at all. Consider a sachet deposit only once collection and end-markets exist; if introduced, keep it low and pair it with targeted support so it is not regressive.

HONEST CAVEAT

Even a perfect deposit-and-buy-back system captures and recycles containers; it does ***not*** reduce how much plastic is produced. Pair it with reduction (Lever 6) and producer redesign (Lever 1).

04 Scale home-grown models: don't try to reinvent the "recycling wheel"

MODELS **Lagos · Abuja · proven in Nigeria**

Nigeria already has working proof that reward-for-recycling changes behaviour. **Wecyclers** (Lagos, since 2012) pays low-income households in points — redeemable for airtime or food — for recyclables collected by cheap, locally-built cargo bikes that reach narrow streets, and is targeting 30,000 tonnes over five years with partners including Unilever and Nestlé. **RecyclePoints** runs a similar model and, tellingly, buys back pure-water sachets alongside PET and cans, in partnership with LAWMA, schools and estates. On the processing end, **Chanja Datti** (Abuja) and **Polysmart** (Lagos) convert collected plastic into flakes and pellets for manufacturers, while **Scrapays** adds a digital marketplace linking generators to collectors.

WHAT POLICYMAKERS CAN DO

Use EPR revenue and public procurement to **scale these proven operators citywide** rather than commissioning untested systems from scratch.

05 Bans & levies that bite, with alternatives ready

MODELS **Rwanda · Kenya · South Africa · Uganda (cautionary)**

Africa holds the global benchmarks. **Rwanda's** 2008 plastic-bag ban helped make it one of the cleanest countries on the continent, and **Kenya's** 2017 ban (among the world's strictest) saw an estimated 80% of people stop using plastic carrier bags. But two lessons matter for Nigeria. First, the cost is real: Kenya's manufacturers reported significant plastic-sector job losses, so a transition plan and affordable substitutes are essential. Second, prohibition without enforcement is theatre. Uganda announced bans four times and enforced none. The differentiator is political will, enforcement capacity, harmonisation across borders, and a ready alternative, not necessarily the gazette itself.

Country	Measure	Outcome	Lesson for Nigeria
Rwanda	Bag ban (2008); monthly community clean-ups	Among Africa's cleanest nations; streets largely litter-free	**Strong enforcement + civic mobilisation works**
Kenya	Strict bag ban (2017) with producer obligations	~80% stopped using carrier bags; global benchmark	**Pair bans with EPR; plan for job transition**
South Africa	Bag levy + mandatory EPR (2020/21)	Levy funds recycling; producers carry costs	**Levies can finance the system**
Uganda	Bans announced four times	Never enforced; little change	**Don't announce what you can't enforce**
Nigeria	Policy (2020); office ban (2024); Lagos enforcing since 2025	Federal ban undelivered; Lagos enforcing hard but leakage to other states	**Build delivery and harmonise before the next deadline**

Sources: Wilson Center; African Climate Insights; Behuria (2021); comparative legal study (2023); AP (2025); Vanguard / Daily Post (2026).

06 Separate at source & compost the organic majority

MODELS **low-tech · job-rich · biggest single stream**

The largest fraction of Nigerian municipal waste is food and organic matter, and it needs no advanced technology. Mandating basic **wet/dry separation** and standing up **community composting and biogas** diverts the heaviest stream from drains and dumpsites, cuts the methane that open dumps emit, and yields saleable compost for agriculture. In Pune, pickers already collect organics for composting and biogas as part of the integrated system. Source separation is also the precondition that makes everything downstream like recycling, buy-back, deposits, etc.work.

ONE THING TO BE SCEPTICAL OF

Large waste-to-energy incinerators are pitched most and disappoint most. They are capital-intensive and need dry, high-calorific waste, which is opposed to Nigeria's wet, organic-heavy stream, so they routinely underperform or stall. Prioritise reduction, collection, separation, composting and recycling first; treat incineration as a distant, carefully-appraised last resort.

Putting it together: one integrated system

The six levers are not a menu of alternatives — they are one system. EPR pays for it; cooperatives and deposits collect the material; separation routes it; recyclers and composters process it; bans and standards shrink what enters in the first place. Diagram B shows how the pieces connect.

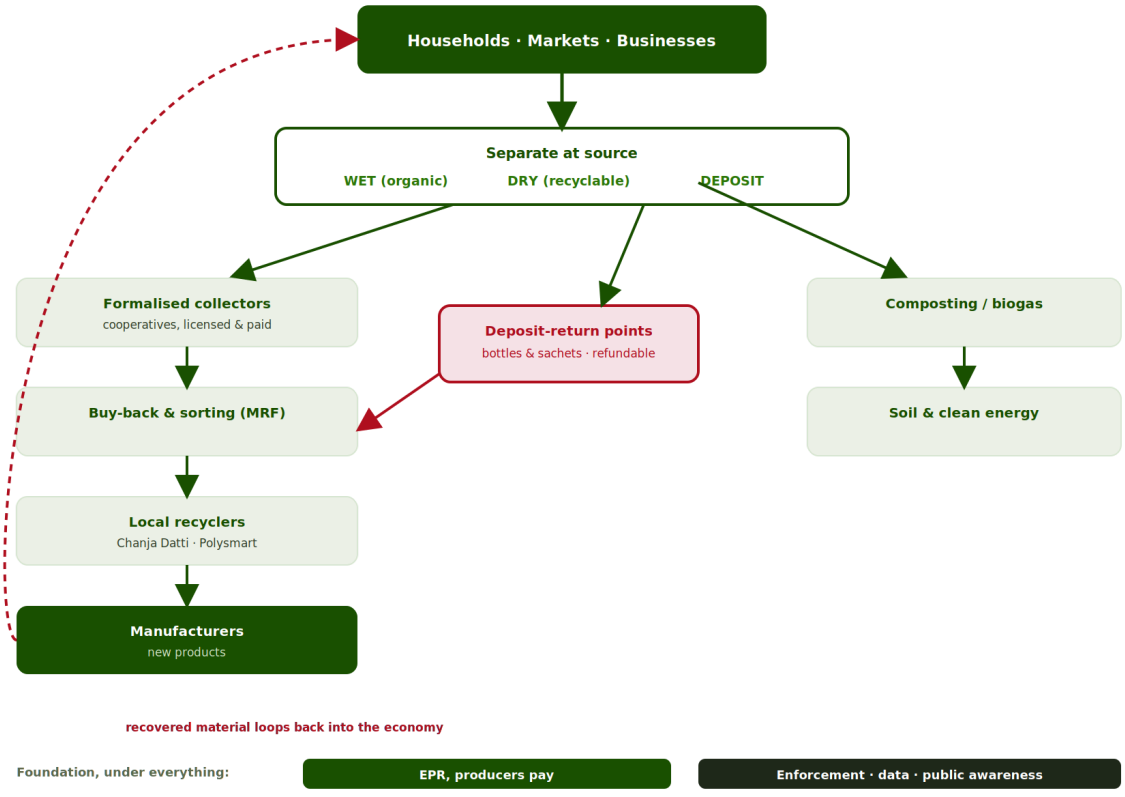

Diagram B · An integrated circular waste system for Nigeria *SimpleFix Nigeria, synthesising the cited models.*

04 What it costs and who pays: financing the system

The figures below are **illustrative orders of magnitude** built from public estimates and stated assumptions to show whether the sums are plausible, not to substitute for a formal regulatory impact assessment. The headline finding is reassuring: at the per-unit level the cost is tiny, and in aggregate it is more than enough to fund collection.

The core arithmetic of an eco-fee

Suppose mandatory EPR places an eco-fee on plastic packaging put on the Nigerian market. Assume illustratively that **1.5–2.0 million tonnes** of plastic packaging is placed on the market each year, and a modest fee of **₦25,000 per tonne** (far below European levels, where fees can run into the hundreds of euros per tonne). That yields on the order of **₦37–50 billion per year** for collection and recycling. The striking part is the per-unit cost:

Item (approx.)	Unit weight	Eco-fee @ ₦25,000/t	What that means
PET water/soft-drink bottle	~20 g	~₦0.50 per bottle	Invisible at the till; meaningful across billions of units
Pure-water sachet	~2 g	~₦0.05 per sachet	At ~20 billion sachets/yr in Lagos alone, ~₦1bn/yr just from Lagos sachets
Carrier bag / film item	~5–10 g	~₦0.13–0.25 each	Negligible per item; cumulative at national scale

Illustrative only to show orders of magnitude, not a costing. Actual fees would be set by material, audited, and phased.

Where the money goes, and what collection costs

Primary collection in lower-income cities typically runs in the rough range of **US$20–50 per tonne**; cooperative collection, as Pune demonstrated, can come in **below private-contractor cost** while paying workers more because the labour is already there and the overheads are lower. An EPR fund of ₦37–50 billion is therefore enough to;

a. pay cooperatives a fair per-tonne or per-household rate,
b. subsidise buy-back prices so collecting sachets and low-value film is worth a collector's time,
c. co-finance material-recovery facilities (MRFs) and composting hubs, and;
d. leave a margin for monitoring and audit.

The table below shows the structure.

Source	Mechanism	Funds (illustrative)
Producer eco-fees (EPR)	Mandatory fee per tonne of packaging on market, by material	Core fund (~₦37–50bn/yr) → collection, buy-back top-ups, sorting
PET deposit (Lagos pilot)	Refundable ₦20–50 per bottle; retailer take-back	Self-funding loop; unredeemed deposits seed the scheme
Bag/SUP levy	Per-bag levy where bags are permitted (>40 microns)	South-Africa-style — earmarked to recycling
Sale of recovered material	Flakes/pellets/compost sold to manufacturers and farms	Revenue to cooperatives and processors (Chanja Datti, Polysmart)
DFIs & patient capital	Concessional finance to de-risk MRFs and plant scale-up	Capital expenditure, not operating subsidy

THE FINANCING HEADLINE

"Producers can't afford it" does not survive the arithmetic: the cost is fractions of a naira per item. The real questions are not *whether* the money can be raised, but whether free-riders are compelled to pay, and whether the fund is governed so the money actually reaches collectors. Both are political concerns which are dealt with in Section 05 below.

05 The politics: jurisdiction, resistance and capture

The technical design is the easy part. However, beyond the technicalities three political realities will decide whether any of it happens, and the brief is candid about each.

Who decides: the federal/state problem

Under Nigeria's constitution, solid-waste management is overwhelmingly a **state and local-government function**, while environmental protection is shared. That is precisely why Lagos can enforce a ban the federal government has not delivered nationally, and why "a national ban" keeps failing to materialise on the ground. The implication is concrete: **"make EPR mandatory" cannot mean a single federal directive**. It means a federal statutory backbone (NESREA regulations with real teeth, national producer registration and targets), *plus* model state legislation and state-level delivery agencies (LAWMA and its equivalents), *plus* an intergovernmental coordination mechanism so producers face **one harmonised regime, not 36 conflicting ones**. Harmonisation is also the answer to leakage: a ban stops at a state line but a national EPR standard and eco-fee travel with the product.

Who resists and how to bring them in

Interest	Why they resist	How to bring them in
Manufacturers (MAN)	Eco-fees raise costs; have argued bans threaten jobs and investment	Co-design fee schedules and timelines; apply fees to all so no first-mover penalty; recycled material as a domestic input
Sachet / table-water producers	Thousands of low-margin SMEs; a sachet levy or deposit hits them hardest	Tiny per-unit levy, not a consumer deposit; fund take-back for them; phase in; transition support
Beverage majors	Cost, but most have capacity and run voluntary schemes (FBRA)	Easiest to onboard if the regime is predictable and universal; build on FBRA rather than displace it
Resin importers	~70% of resin is imported; interest in continued virgin throughput	Recycled-content targets create a domestic feedstock market they can serve
Exploitative middlemen	Aggregators who skim collector margins may resist formalisation	Pay cooperatives directly; transparent posted buy-back prices; cut out the rent

The capture problem: why "ring-fence and audit" is not enough

Nigeria's implementation failures beyond capacity are also about rent-seeking and weak institutions. Earmarked funds get raided; audits get captured. So the standard remedy which is to "ring-fence the fund and audit it", though necessary, will on its own still be to some degree naive and hopeful. A credible EPR fund needs design that assumes pressure to divert it:

- **Hold the money outside a government account.** Route fees through accredited, independent Producer Responsibility Organisations under NESREA oversight, into legally ring-fenced *escrow* protected from diversion, rather than making it a line in a ministry budget.
- **Tripartite, published governance.** A board with producer, government and independent civil-society/technical seats; decisions and accounts public by default.
- **Verify tonnages independently.** Third-party verification of what is collected and recycled, because over-claiming for payment is the classic way EPR money leaks.
- **A live public dashboard.** Fees collected, tonnes collected/recycled/returned, and payments to collectors — visible in near-real time so the gap between promise and delivery is obvious to everyone.
- **Clawback and sunset.** Targets missed trigger published consequences; the regime is reviewed, not permanent by default.

The same logic answers a fair objection**: *If Nigeria already has a voluntary EPR via FBRA, why mandate it?*** Because voluntary schemes let free-riders off, so the responsible firms subsidise the rest and coverage stays thin. Mandating registration and fees closes the free-rider gap; governing the fund well is what stops the money vanishing once it is raised.

06 Sequencing: a phased roadmap

None of the recommendations in this brief require doing everything at once. A more realistic path would start with low-cost, high-trust wins that build capacity, evidence and a **measured baseline**, then move on to scales financing and infrastructure, before attempting national consolidation. Lagos should be the natural pilot, as it has the worst plagued by the issue, has the most state capacity, and also the existing operators to build on.

PHASE 1 · 0–12 months · quick wins	PHASE 2 · 1–3 years · scale	PHASE 3 · 3–5 years · consolidate
• Recognise and pilot cooperative collection in 1–2 Lagos LGAs (ID cards, basic kit, safety). • Enforce mandatory EPR registration and begin collecting eco-fees into ring-fenced escrow. • Launch a PET deposit pilot in Lagos with retailers. • Fund existing operators (Wecyclers, RecyclePoints) to expand catchment and sachet buy-back. • Commission an independently-verified waste baseline and a public data dashboard.	• Citywide cooperative collection + buy-back centres, financed by EPR. • Mandatory EPR with published recycled-content and collection targets, third-party verified. • Scale sachet buy-back and stand up end-markets for recovered film. • Source-separation mandate + community composting hubs. • Enforce the SUP ban with affordable alternatives in market.	• Replicate the Lagos model in other states and the FCT; harmonise standards. • Set recycled-content standards and design rules for packaging. • National ban enforcement backed by mature alternative supply. • Independent monitoring and annual public reporting of targets. • Integrate informal workers into social protection.

Who does what

Actor	Core responsibility
Federal Govt & NESREA	Make EPR mandatory and enforce it; set recycled-content and packaging standards; accredit and oversee PROs; lead federal–state harmonisation; align the 2020 policies with delivery.
State govts & agencies (Lagos / LAWMA)	Organise and license cooperative collection; run buy-back and deposit-return points; mandate source separation; enforce locally with alternatives in place.
Producers & PROs	Pay eco-fees; redesign packaging for recyclability and recycled content; finance take-back; meet published, verified targets.
Financiers & DFIs	Provide patient capital for MRFs, recycling plants and enterprise scale-up; de-risk the early market.
Civil society & media (incl. SimpleFix)	Translate policy for citizens; track commitments against delivery; sustain public pressure between elections.
Informal workers & cooperatives	The collection backbone — to be recognised, organised, equipped, kept safe and paid, not displaced.

07 Risks and how to avoid them

Risk	Mitigation
Bans without substitutes raise costs and kill jobs (Kenya saw plastic-sector losses).	Sequence bans after affordable alternatives are in market; support manufacturers to retool; phase categories in.
Announce-but-don't-enforce — the Uganda trap, and Nigeria's federal-ban risk.	Tie every deadline to a named enforcing agency, a budget line, and a published compliance report.
EPR fund captured, raided or unspent — fees collected but collection not funded.	Independent PRO + ring-fenced escrow outside government accounts; tripartite board; third-party tonnage verification; live public dashboard; clawback on missed targets.
Sachet deposit imposed prematurely — regressive and unworkable without an end-market.	Producer-funded buy-back and end-market creation first; tiny per-unit levy, not a consumer deposit; deposit only later, if at all, and kept low.
Excluding, displacing or unsafely deploying waste pickers (even Bogotá's model has come under threat).	Write recognition into law; gender-equitable cooperatives with standing and contracts; PPE, vaccination and hazardous-waste protocols; protect access rights.
Single-state action leaks across borders ("NOT FOR LAGOS").	Harmonise EPR and standards nationally; coordinate state bans; let the eco-fee travel with the product.
"White-elephant" incinerators that underperform on wet waste.	Prioritise reduction, collection, separation and composting; appraise any waste-to-energy against those alternatives first.
Data vacuum — no baseline, no accountability; the diagnosis itself rests on contested estimates.	Fund an independently-verified baseline and simple public metrics (tonnes collected, recycled, returned) from day one.

08 Recommendations

If Nigeria's policymakers did only five things, these are the five chosen due to the manner by which they act as pillars to each other, and also each have a working precedent in a comparable economy.

- **Make EPR mandatory.** Turn the existing programme into the financing engine: producer fees, ring-fenced in escrow outside government, tripartite-governed, third-party-verified and published. *(Lever 1; Germany, South Africa.)*
- **Recognise, equip and pay the waste pickers you already have.** License gender-equitable cooperatives, issue IDs, ensure occupational safety, integrate them with LAWMA and finance them through EPR. This fixes collection — the binding constraint. *(Lever 2; Pune, Bogotá, Belo Horizonte.)*
- **Treat the sachet as the hard case.** Producer-funded buy-back plus deliberate end-market creation now; a small per-unit levy, not a regressive consumer deposit. Put a refundable deposit on PET bottles in Lagos first. *(Lever 3; Norway, Germany — for bottles.)*

- **Fund and scale Nigeria's proven operators.** Use EPR revenue and procurement to expand Wecyclers-, RecyclePoints- and Scrapays-style models citywide instead of importing untested systems. *(Lever 4; Lagos.)*
- **Build delivery, a baseline, and harmonisation before the next deadline.** Establish a measured, independently-verified baseline; coordinate across states so bans don't simply leak; only then set national deadlines. *(Sections 05–06; the lesson of Uganda and "NOT FOR LAGOS.")*

Bans and standards (Lever 5) and source separation and composting (Lever 6) are the backstop and the foundation — necessary, but only effective once the five above are delivering. Above all: **build and fund the delivery system before setting the next deadline.**

In one line

Fund EPR and guard the fund, pay the collectors Nigeria already has, give the sachet a real plan rather than a deposit it can't bear, and scale what already works — with bans as the backstop, not the strategy. The policies exist; this is the plumbing, and the money to run it.

§ SOURCES & NOTES

Closing the Gap — Practical, Proven Solutions to Nigeria's Waste Crisis, SimpleFix Nigeria (June 2026)

This brief draws on peer-reviewed studies, UN and World Bank assessments, recent reporting through 2026, and the documented experience of Rwanda, Kenya, South Africa, Germany, Norway, Lithuania, India, Colombia, Brazil and Nigeria's own social enterprises. Sources are listed below by section, with a short note on what each supports. Cost figures in Section 04 are clearly-labelled illustrative estimates intended to show orders of magnitude, not a costing. Italic *Notes* flag points of nuance, contested dates, or figures given as ranges.

01 · The problem: a collection-and-finance crisis

- **UN Environment Programme** — the pure-water sachet as Nigeria's signature waste stream; estimate of 50–60 million used sachets discarded daily; low-value multilayer film with no real domestic end-market. unep.org/news-and-stories/story/rarely-told-story-widely-used-water-sachets
- **USAID, via Reuters / Punch** — Nigeria generates more than 2.5 million tonnes of plastic waste a year and ranks among the world's largest plastic polluters (9th globally); over 70% leaks into waterways, drains and landfills. punchng.com/nigeria-needs-to-tackle-plastic-pollution
- **World Bank / West Africa Coastal Areas (WACA) programme** — under 12% of Nigeria's plastic is recycled; Nigeria is a major importer of virgin plastic resin, meeting close to two-thirds of demand through imports. worldbank.org (WACA); sustainableplastics.com
- **The Conversation** — Lagos generates at least 13,000 tonnes of waste a day, roughly a fifth of it plastic; plastic-choked drains as a primary driver of recurrent urban flooding. theconversation.com/plastic-pollution-in-nigeria-184591
- **Associated Press (Aug 2025)** — Lagos contributed an estimated 870,000 tonnes of plastic waste in 2024; weak early enforcement of the Lagos ban and the absence of ready alternatives. apnews.com
- **EnviroNews Nigeria; Mongabay / World Bank (Feb 2026)** — Lagos collection and recycling shares (roughly 40% formally collected, about 12–13% recycled); the central role of pickers and middlemen in what collection does occur. environewsnigeria.com; news.mongabay.com/2026/02
- **SEDIN / GIZ Lagos plastic value-chain assessment** — daily generation, collection and recycling estimates underpinning Figure 1b; resin-import dependence. sedin-nigeria.net
- **Journal of Health & Pollution (peer-reviewed)** — independent confirmation of the sub-12% recycling rate. ehp.niehs.nih.gov

Note — sachets, Lagos vs Nigeria. The 50–60 million-sachets-a-day figure (and the ~20 billion-a-year figure in Section 04) is framed by UNEP and most coverage as a **national** estimate, with Lagos the largest single contributor; Reuters and AP localised it to Lagos. We give it as a Nigeria-wide figure of which Lagos is the heaviest share. *Note — resin.* World Bank framing is "almost two-thirds" (~60–67%) imported; we use "around two-thirds" rather than a flat 70%. *Note — Lagos daily tonnage.* LAWMA's commonly-cited figure is ~13,000 t/day; some 2026 estimates run higher (15,000–20,000+), so a range is given.

02 · What Nigeria already has and why it stalls

- **Federal Ministry of Environment, via Reuters** — National Policy on Plastic Waste Management (2020) and National Policy on Solid Waste Management (2020); frameworks linked to the Basel Convention, the SDGs and the UN climate process. reuters.com
- **NESREA (National Environmental Standards and Regulations Enforcement Agency)** — Extended Producer Responsibility programme operating under the 2014 operational guidelines and the Polluter-Pays Principle; National Circular Economy Roadmap; National Waste Marketplace. nesrea.gov.ng/extended-producer-responsibility
- **Realnews; Food & Beverage Recycling Alliance (FBRA)** — FBRA as Nigeria's first packaging Producer Responsibility Organisation; the EPR scheme's self-regulatory, largely voluntary operation in practice. realnewsmagazine.net; fbranigeria.ng
- **PM News (Apr 2026)** — NESREA's stated shift of EPR "from voluntary to mandatory," to be instituted before the end of 2026 — confirming that the scheme has run voluntarily to date. pmnewsnigeria.com/2026/04/01
- **Punch (2024); African Clean Cities Platform** — the nationwide ban on bags, cutlery and straws targeted from January 2025; full styrofoam phase-out by December 2028; single-use plastics removed from federal offices (2024); all packaging recyclable or biodegradable by 2030. punchng.com; africancleancities.org

- **Lagos State Ministry of the Environment & Water Resources** — Lagos single-use-plastic and styrofoam ban; full enforcement from 1 July 2025; PET bottles and water sachets deliberately excluded and routed to EPR; producer-financed Plastic Waste Management Fund. moelagos.gov.ng
- **Vanguard / Champion / Daily Post (2026)** — intensified Lagos enforcement: 239 facilities sealed, 931 waste-offence arrests, over 8,000 environmental offenders prosecuted in a year, and 137,530.94 kg of PET recovered in 2025; interstate "NOT FOR LAGOS" leakage; the Oyo single-use-plastic measure. vanguardngr.com/2026/05; channelstv.com/2026/05/25; dailypost.ng/2026/04/01/styrofoam-ban-in-lagos-oyo-puts-ogun-on-edge
- **P. Behuria, *Environment and Planning C* (2021)** — the regional lesson that a gazette is not a result; Uganda's repeated, unenforced bag-ban announcements. journals.sagepub.com/doi/10.1177/2399654421994836

Note — Plastic Waste Control Regulations. The brief cites the National Environmental (Plastic Waste Control) Regulations, **2023**; NESREA's 2026 statements refer to an *emerging* 2026 instrument. Confirm the gazetted date/status before publication. *Note — enforcement tallies.* The 239 sealed, 931 arrests and 8,000+ prosecutions are exact, but span **all** environmental offences in Lagos (including illegal highway-crossing, street-trading and open defecation), not plastic alone; the PET-recovery figure is plastic-specific.

03 · A solutions framework: six measures that work

Lever 1 — Make EPR real

- **NetZero Pathfinders** — Germany's "Green Dot" packaging system and deposit-return scheme; a 67.9% packaging-recycling rate in 2021. netzeropathfinders.com (deposit-return-schemes-germany)
- **eWASA; Plastics SA; WWF South Africa** — South Africa's move to mandatory EPR (Section 18 Regulations, published November 2020, in force May 2021). ewasa.org/epr
- **Packaging School** — Kenya's producer obligations developed alongside its 2017 bag ban. packagingschool.com

Lever 2 — Formalise the waste pickers you already have

- **WIEGO (Women in Informal Employment: Globalizing and Organizing)** — integration of waste pickers in Bogotá, Belo Horizonte and Pune; drainage and emissions co-benefits; the gendered structure of the workforce and earnings. wiego.org
- **The India Forum (2026); SWaCH** — Pune's SWaCH cooperative: ~95% household coverage; municipal ID cards; member incomes of ₹6,000–8,000 a month versus ₹4,000–5,000 for unorganised pickers; per-capita cost roughly 30% below privatised cities; Cape Town buy-back centres. theindiaforum.in
- **Proparco** — SWaCH integration cut waste-to-disposal by more than 20% and cost less than private contractors. proparco.fr
- **World Resources Institute** — SWaCH as a worker-owned model that formalises rather than displaces existing collectors. wri.org
- **S. Dias, *Environment and Urbanization* (SAGE)** — Belo Horizonte's recognition of cooperatives as paid service providers since 1993.

Note — the workforce is mostly men in Nigeria. Peer-reviewed Nigerian studies find waste-picking is **male-dominated** (for example 93.2% male in Mubi; predominantly male in Abuja and North-Central Nigeria; a 2015 *Urban Forum* study describing the sector as dominated by males "to the virtual exclusion of females"). Women participate but are concentrated in the lowest-value, most hazardous and least-paid niches and largely excluded from ownership and supervisory roles; in non-organised settings men out-earn women, with the gap narrowing in cooperatives. The ~80%-women pattern belongs to **Pune**, not Nigeria. The "formalise the workforce" case is therefore framed around organising a largely young, migrant, male workforce while deliberately building equal cooperative membership and leadership for women. Sources: *Urban Forum* / Nzeadibe (link.springer.com/article/10.1007/s12132-014-9246-0); Mubi scavenger study (academia.edu/102414335); Agunwamba, *Environmental Management* (2003); IIED Working Paper (iied.org); WIEGO; SWaCH gender data (theindiaforum.in). *Note — Bogotá.* The Constitutional Court's landmark waste-picker rulings are usually dated 2003 (T-724) and 2011 (Auto 275, which forced payment and inclusion); cite "a series of rulings, 2003–2011" rather than 2009 alone.

Lever 3 — Deposit-return for PET, and the sachet as the hard case

- **TOMRA** — container-return rates: Germany above 98%, Norway 92%, Lithuania from below 34% to over 90% within two years; the design factors (a worthwhile deposit, convenient return points, retailer take-back) that make schemes work. tomra.com
- **The Guardian Nigeria (Apr 2024); MSME Africa (2026)** — sachet retail pricing of roughly ₦20–50, against which a ₦4–10 deposit is 20–50% of the price (a regressive burden). guardian.ng

- **France 24 (Mar 2024)** — deposit schemes recover containers but do not by themselves reduce total plastic production. france24.com

Note — no proven sachet deposit-return. Every cited deposit-return success is for rigid PET, glass or aluminium with reverse-vending and a mature recyclate market; there is no established consumer deposit-return precedent for flexible multilayer sachets, which is why the brief proposes producer-funded buy-back and a small per-unit levy rather than a consumer deposit for sachets.

Lever 4 — Fund and scale Nigeria's proven operators

- **MIT News; Independent Nigeria (2025)** — Wecyclers (Lagos, 2012), its locally-built cargo bikes and points-for-airtime/food model; RecyclePoints' rewards-for-recycling and sachet buy-back; Chanja Datti (Abuja) and Polysmart (Lagos) processing plastic into flakes and pellets; Scrapays as a digital scrap marketplace. news.mit.edu/2015; independent.ng

Note — Wecyclers partners/target. The Nestlé partnership is confirmed (2019 MoU); the "30,000 tonnes over five years" target and the Unilever partnership should be checked against Wecyclers' own announcements before publication.

Lever 5 — Bans and levies, done properly

- **Wilson Center; American Journal of Law (comparative study, 2023)** — Kenya's 2017 ban (among the world's strictest) with producer obligations; Rwanda's 2008 ban (Law 57/2008) and reputation as one of Africa's cleanest countries. wilsoncenter.org
- **African Climate Insights (2024); NEMA Kenya** — roughly 80% of Kenyans stopped using plastic bags after the ban; South Africa's bag levy funding recycling; plastic-manufacturing job-loss claims (reported as an industry estimate). africanclimateinsights.com
- **UNDP** — Rwanda's monthly "Umuganda" community clean-ups, in place since the mid-1990s. undp.org/blog/umuganda
- **P. Behuria, *Environment and Planning C* (2021)** — Uganda's repeated, unenforced ban announcements, defeated by manufacturer lobbying; the conclusion that political will, enforcement, harmonisation and ready alternatives — not the gazette — make the difference. journals.sagepub.com/doi/10.1177/2399654421994836

Note — Uganda "four times." Behuria documents a recurring pattern of announced-but-unenforced bans; the count of four is the brief's tally of the cases he sets out.

Lever 6 — Separate at source and compost; caution on incineration

- **Centre for Public Impact; LAWMA / Guardian Nigeria** — organic and food waste as the largest fraction of Nigerian municipal waste, making source separation the precondition for downstream recycling and composting/biogas. centreforpublicimpact.org
- **World Bank, *What a Waste 2.0*** — the case for caution on large waste-to-energy incinerators, which are capital-intensive and need dry, high-calorific feedstock unlike Nigeria's wet, organic-heavy stream. openknowledge.worldbank.org

04 · What it costs and who pays: financing the system

- **World Bank, *What a Waste 2.0*** — primary-collection cost ranges (on the order of US$20–50 per tonne) for low- and middle-income cities, against which the illustrative figures are benchmarked. openknowledge.worldbank.org

Note — these figures are illustrative. The packaging-tonnage × eco-fee calculation (≈₦37–50 billion a year), the per-unit eco-fees (PET ≈₦0.50, sachet ≈₦0.05, bag ≈₦0.13–0.25) and the collection-cost estimates are clearly-labelled orders of magnitude built from stated assumptions. They are internally consistent and the assumed ₦25,000/tonne fee sits well below mature-market levels (EU fees run into hundreds of euros per tonne), but they are not a costing and should not be read as one.

05 · The politics: jurisdiction, resistance and capture

These points are analytical rather than statistical and rest on the facts established above:

- **Constitutional division of responsibility** — environment is a shared competence while solid waste is largely a state and local-government function, which is why Lagos can enforce what the federal government has not, and why harmonisation across states matters (see Section 02 sources).
- **EPR capture and over-reporting** — the governance design (an independent PRO, escrow held outside government accounts, a tripartite board, third-party tonnage verification, a public dashboard, and clawback/sunset provisions)

responds to documented EPR failure modes, chiefly fraudulent over-reporting of recovered tonnage, noted across the WIEGO and EPR literature above.

06–08 · Sequencing, risks and recommendations

These sections restate and prioritise the measures in Section 03 and introduce no new factual claims; their evidence base is the per-lever sourcing above. Where the recommendations reference "gender-equitable cooperatives," see the gender note under Lever 2.

Note on numbers. *Several figures in this brief are widely-cited estimates rather than official census data; where a precise national time-series does not exist, ranges are given. Country comparators are drawn from the cited peer-reviewed studies, UN/World Bank assessments and reputable reporting, and dates for landmark legal measures are given as the literature records them. All cost figures in Section 04 are clearly-labelled illustrative estimates built from stated assumptions, intended to show orders of magnitude. This brief is an evidence synthesis for policy discussion, not a substitute for a full regulatory impact assessment.*

About SimpleFix Nigeria. SimpleFix Nigeria is a civic-education and policy-literacy organisation focused on developing simple-stepped policy solutions to Nigerian issues. Beyond raising awareness of policy issues, SFN works to translate complex policy for citizens and to put workable, evidence-based solutions in front of decision-makers.

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