

Circular Economy Position Paper on Private Sector–Driven Circular Economy Solutions: Promoting a Sustainable Plastics Value Chain in the COMESA Region

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Introduction

A circular economy is an economic model that moves beyond the traditional “*take-make-dispose*” approach by promoting resource efficiency, waste reduction, and the reuse, recycling, and recovery of materials across production and consumption systems¹. Applied to plastic waste, this approach encourages the redesign of products and packaging, strengthens recycling markets, and keeps plastics in circulation rather than in landfills or the environment.

As global markets increasingly demand environmentally responsible goods and comply with stricter sustainability standards, circular production models can support organisations in the COMESA region meet export requirements and remain competitive. Ultimately, the circular economy supports more resilient regional value chains, boosts intra-regional trade, and drives sustainable, private sector–led growth. For the COMESA region, advancing circular solutions of recovering plastic waste can lower business costs, create new enterprise and job opportunities, strengthen regional value chains, reduce environmental and health risks, reduce over-reliance on raw materials and enhance the competitiveness of the private sector supporting sustainable and inclusive growth across Member States.

However, rising plastic waste continues to reflect weak market incentives for alternatives, underdeveloped waste management systems, and limited profitability in recycling, constraining investment and the growth of viable recycling industries. At the same time, the informal sector plays a critical yet often under-recognised role in plastic recovery. Informal waste pickers, aggregators, and recyclers are at the frontline of material recovery but typically operate without legal protection, access to finance, or integration into formal systems. In Kenya alone, the

¹ Figge, F., Thorpe, A., Gutberlet, M. (2023) Definitions of the circular economy: Circularity matters Ecological Economics.

Kenya National Waste Pickers Welfare Association estimates to have over [48,000 registered waste pickers, with 25,000 being women.](#)

When it comes to Circular Economy (CE) policy frameworks, countries such as Kenya, and Rwanda are emerging as regional leaders, with more comprehensive and better-enforced policies-Rwanda, for instance, already has a national Circular Economy Action Plan and strong enforcement mechanisms. Other countries, including Zambia, remain in the early stages; Zambia’s National Green Growth Strategy (2024–2030) incorporates CE as a guiding principle but requires further operationalisation. In Malawi, CE development is also at an early stage, compounded by weak enforcement of existing waste policies.

This position paper has been developed through the CBC Circular Economy and Environment Workgroup in recognition of the urgent need for a well-structured, private-sector-driven circular economy initiative and a robust plastic waste recycling mechanism that promotes sustainable regional value chains by incentivising plastic waste collection. The paper calls on COMESA Member States to champion private-sector-led CE initiatives and to strengthen and scale the role of the informal sector within a structured circular economy framework.

COMESA Initiatives on Circular Economy

COMESA is undertaking several initiatives to promote circular economy practices and sustainable industrialisation across its Member States. In 2024, COMESA, in partnership with the European Union, initiated the SWITCH to Circular Economy in the Eastern and Southern Africa Region (SWITCH 2CE) project to accelerate the transition toward green growth and resource efficiency².

The COMESA Business Council (CBC) recently introduced a Circular Economy and Environment Workgroup, which provides a platform for the private sector to contribute to green growth through innovation, investment, and policy advocacy.

Building on these initiatives, COMESA aims to scale up regional programmes that promote sustainable production, green innovation, and women’s participation in value chains.

Challenges in CE and plastic waste management

There are several barriers to the proper implementation of CE and proper plastic waste management at national and regional. These include:

1. **Inadequate infrastructure to support plastic waste management and recycling mechanisms:** Lack of infrastructure for low-value plastic recovery discourages investment. This leads to improper plastic disposal by the public.

² https://www.eeas.europa.eu/delegations/zambia/comesa-%E2%80%93-european-union-strategic-dialogue-launch-new-eur-40-million-regional-circular-economy_en

2. **Inadequate Knowledge:** There is limited knowledge among the private sector and communities in the region to spearhead initiatives such as the Extended Producer Responsibility (EPR) model.
3. **Limited Resources:** There are limited resources in the region to fund Circular Economy and waste management activities targeting the private sector businesses.
4. **Lack of CE monitoring framework:** Countries have no comprehensive CE monitoring framework; plastics and e-waste data are fragmented and inconsistent.
5. **Policy Frameworks:** Informal actors recover more plastic waste in some Member States but remain excluded from policy frameworks.
6. **Fragmented Regulation:** There is a lack of harmonised or inefficient policies and waste management policies both in country and at the regional level.
7. **Lack of Awareness:** A general lack of urgency and appreciation regarding the necessity of a circular economy.

CBC's Recommendations for Action



1. **Development of Functional Circular Economy Policy Frameworks:** There is a strong need for COMESA Member States to develop and harmonize comprehensive policy and regulatory frameworks that guide the transition toward circular economy (CE) practices. Functional CE policies should establish clear standards for waste management, recycling, and sustainable production, while integrating CE principles into national development and industrial strategies.

2. **Allocation of Financial Resources:** To overcome financial barriers, there is a need to increase access to funding for circular economy initiatives, particularly for small and medium enterprises. COMESA could establish a regional financing mechanism that supports recycling, innovation, and waste management projects. Expanding financial inclusion will ensure that private sector actors can effectively invest in circular business models that generate both economic and environmental returns.
3. **Regional Coordination and Capacity Building:** As the COMESA Business Council is part of the COMESA SWITCH to Circular Economy in Southern and East Africa (SWITCH 2CE) project, through this project, CBC take an active role in supporting capacity building activities for the private sector.
4. **Investment in Recycling Infrastructure at Country Level:** Investment in infrastructure not only enhances recycling capacity but also creates employment, supports industrialization, and reduces environmental pollution. CBC can play a coordinating role by identifying priority investment areas, facilitating cross-border trade in recycled materials, and mobilizing regional resources to scale up infrastructure development that supports a functioning circular economy across Member States.
5. **Integrate Informal Sector Actors into Policy and Value Chains:** Informal sector workers play a vital role in plastic recovery but remain largely excluded from formal frameworks. COMESA can support Member States in integrating these actors into national and regional waste management systems through recognition, training, and partnership models.
6. **Stakeholder Engagement and Collaboration:** CBC can assist with establishing regional platforms and dialogues, such as organising workshops and focus groups, bringing together Governments, private sector, research institutes, academia and the public to foster innovation and knowledge sharing.

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