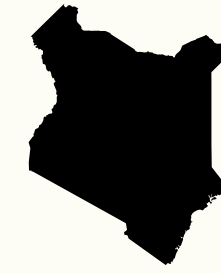


# Country profile

KENYA

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Anchored by widespread community use of product ‘ATMs’, a strict single-use plastic bag ban, and the recent introduction of mandatory extended producer responsibility (EPR), Kenya is highly primed to scale formal refill models.

## SNAPSHOT ON REFILL IN KENYA

No binding legal or policy instruments that sets reuse targets or directly regulate businesses adopting refill solutions.

Plastic bag ban which is effective as it is enforced and implemented alongside economic incentives such as increasing single-use plastic fees.

Mandatory EPR scheme.

National Plastic Action Partnership (NPAP) present in country.

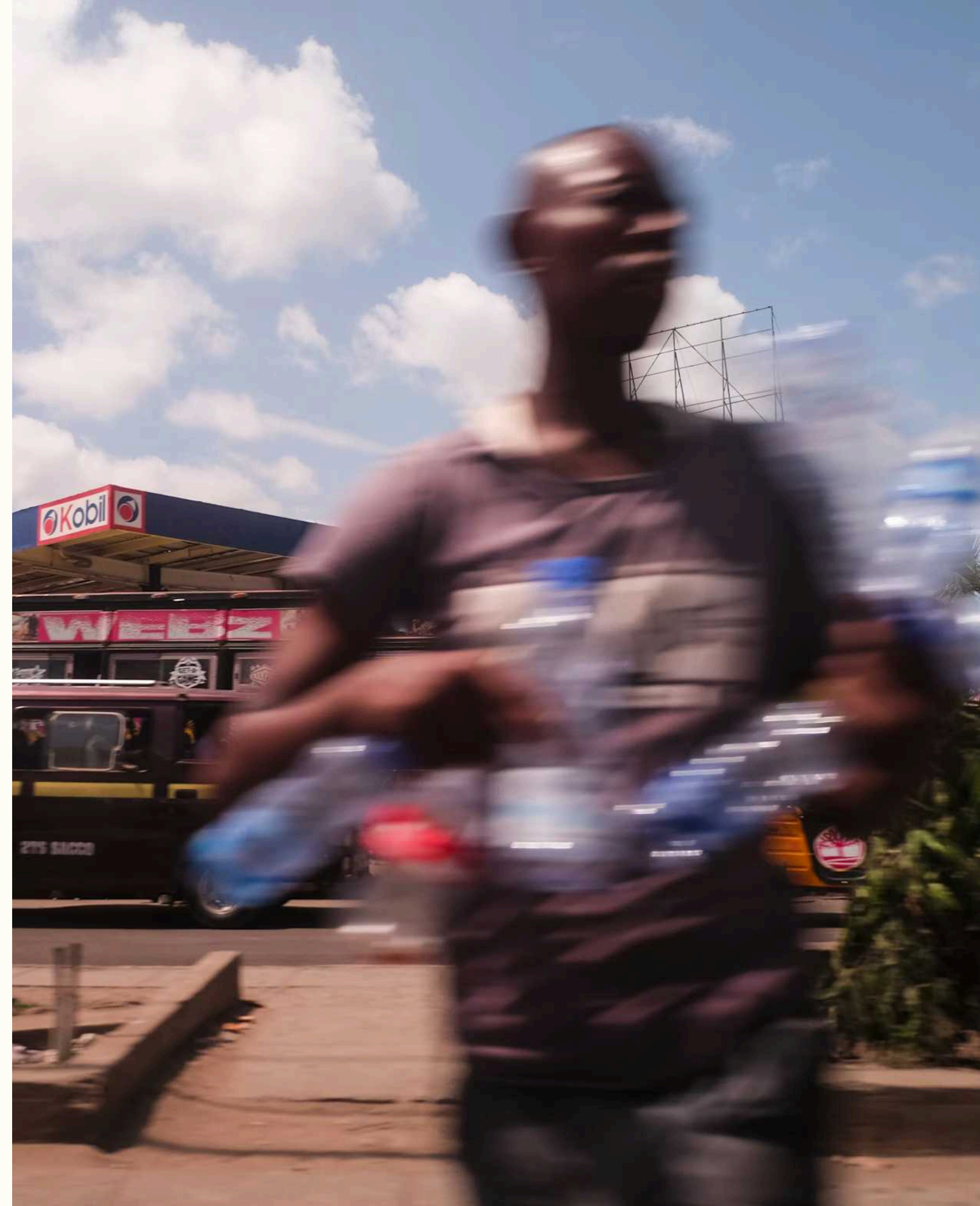
Plastic Pact present in country.

More than ten refill enterprises.

No brand commitments for refill.

Small range of products present in refill:  
*Home care, edible oil and fuel. Milk refill is typical for Kenya.*

Deposit-return schemes are included in policy frameworks but not implemented.





## 1. Refill context

Roundtable discussions conducted as part of this study highlighted that refill and reuse practices in Kenya are still at an early stage, yet are perceived as evolving and increasingly necessary. Although not yet widespread, refill solutions are already present in selected communities through water refill stations, milk ATMs in retail settings, and oil refilling points. These models are primarily concentrated in urban areas and informal retail spaces, and are currently limited to products such as milk, cooking oil, fuel, and water.

Scaling remains constrained by limited infrastructure, including bulk packaging systems, dedicated retail space, and clear standards related to hygiene, safety, and product legitimacy. While regulatory frameworks specific to refill and reuse remain limited, strong single-use plastic regulations and emerging EPR frameworks are creating an enabling direction of travel for refill and reuse solutions.

At the same time, a growing number of entrepreneurs and initiatives are piloting refill models across different product categories. While these efforts remain fragmented and relatively small in scale, they demonstrate increasing ecosystem momentum and innovation.



## 2. History of refill

Refill and reuse systems are not new in Kenya and are deeply rooted in everyday consumption practices. Cultural norms around affordability and flexible purchasing have long supported the reuse of containers and the sale of essential goods in small quantities. These behaviours reflect strong familiarity with refill, although they have historically been driven by necessity and convenience rather than environmental awareness. Roundtable participants also noted that reuse and refill practices have existed in Kenyan communities for a long time.

Traditional markets and small neighbourhood grocery shops, commonly known as dukas or kiosks, continue to play a central role in enabling these practices. Essential goods such as cooking oil, grains, and household products are frequently sold in bulk or loose formats, allowing consumers to bring their own containers. Informal and community-based distribution systems also support refill practices, particularly in urban and peri-urban areas where access to formal retail remains uneven.

Kenya has also developed more structured refill models through the expansion of milk dispensing machines, commonly known as “milk ATMs,” where customers can choose the product amount based on what they pay. These systems have grown significantly since the mid-2000s and are widely used by low- and middle-income consumers due

to their affordability, convenience, and accessibility Ayuya et al., 2022. Milk ATMs operate within regulated dairy supply chains and are subject to food safety oversight by the Kenya Dairy Board, representing one of the more formalised refill systems in the country. Similar dispensing technologies have since been adopted for cooking oil, water, and selected sanitary products, particularly in informal settlements Dijkstra, 2021.

In recent years, growing public awareness of plastic pollution, together with strong national restrictions on single-use plastics, has contributed to renewed interest in refill and reuse solutions and created greater openness towards alternative delivery models.



### 3. Policy landscape

Kenya faces a stark waste management crisis despite relatively low per capita waste generation compared to global averages World Bank, 2026. In 2020, 92% of its waste is mismanaged due to lack of collective service in rural areas and waste leakage from urban areas IUCN-EA-QUANTIS, 2020. Plastics account for around 20% of daily waste, yet only 27% is collected and approximately 8% is recycled Paruta et al., 2020; Global Plastic Action Partnership, 2025. The remaining waste often leaks into terrestrial and marine ecosystems or is openly burned.

Although Kenya has not yet introduced specific legal instruments that directly promote refill and reuse systems, it has implemented a range of policies to reduce plastic pollution and advance circular economy principles. These policies have played an important role in shaping consumer behaviour and creating enabling conditions for refill and reuse models.

#### **Single-use plastic regulation and behavioural change**

Entered into force in 2017, the *Plastic Bag Ban (Notice No. 2356 under the Environmental Management and Coordination Act)* prohibits the manufacture, import, distribution, and use of single-use plastic bags for retail and household packaging. The regulation includes some of the strictest penalties globally, including fines up to US\$ 40,000 and imprisonment for non-compliance March et al., 2025.

The Ministry of Environment and Forestry estimates suggest

that the ban has prevented approximately 6.2 billion bags from entering waste streams and around 80% enforcement success Olila and Biesalski, 2025. High compliance has led to significant behavioural shifts, with ownership and use of reusable bags tripling in numbers. Refill entrepreneurs describe the ban as a “game changer”, as it normalised the habit of bringing containers for essential products such as milk and water. However, challenges remain, including illegal imports of plastic bags from neighbouring countries Mbugua, 2021.

#### **Expansion of single-use plastic restrictions**

In 2020, Kenya expanded its regulatory approach by banning single-use plastics in protected areas such as national parks, beaches, forests, and conservation zones (*Gazette Notice 4858 under the Wildlife Conservation and Management Act*). The policy was accompanied by guidelines and an action plan for single-use plastics management as well as awareness campaigns such as social media campaigns and integration into educational curriculums. It also introduced economic instruments, such as increased fees on single-use plastics to discourage consumption UN Environment Programme, 2021. While primarily focused on restricting problematic materials, these measures further reinforced behavioural change and public awareness in the country.

#### **Waste governance and circular economy transition**

The National Sustainable Waste Management Bill outlines

roles and responsibilities across national and county governments, businesses, and citizens. It incorporates circular economy principles such as polluter-pays, zero waste, environmental protection, and social inclusion Government of Kenya, 2021. The bill also proposes the establishment of a national waste management council to guide strategies across prevention, reuse, recycling, and disposal.

The framework promotes the closure of uncontrolled dumpsites, the development of recovery infrastructure, and the potential of deposit-refund and take-back schemes for packaging. It is accompanied by a strict non-compliance penalty fine of USD 1,855 or up to one year of imprisonment. If effectively implemented, these mechanisms could support returnable packaging and refill models. However, implementation capacity, coordination across counties, and financing remain key challenges.

#### **Extended producer responsibility**

*The Sustainable Waste Management (Extended Producer Responsibility) Regulations, Legal Notice No. 176 of 2024*, represent a significant shift towards producer accountability. The regulations require producers to register with the National Environment Management Authority, develop take-back schemes, and contribute financially to waste management. Producers must maintain detailed records on production, collection, recycling and disposal

and submit annual reports to regulators. Covered product categories include packaging, hazardous packaging, electrical and electronic equipment, end-of-life vehicles, and other priority items World Wide Fund for Nature, 2022.

This marks a shift towards producer accountability and could provide financial and operational support for circular packaging systems. However, the current framework remains focused on recycling and downstream waste management, with limited incentives or operational guidance to prioritise reuse and refill models.

**Industry collaboration and voluntary initiatives: Kenya Plastics Pact and National Plastics Action Partnership**

Voluntary and collaborative initiatives further strengthen Kenya's circular economy transition. Kenya is the 12th country to join the Plastics Pact Network, a globally aligned network of initiatives to implement a circular economy for plastics. The Kenya Plastics Pact sets ambitious 2030 targets, including eliminating unnecessary and problematic single-use plastic packaging through redesign, innovation, and reuse delivery models; ensuring that 100% of plastic packaging is reusable or recyclable; achieving 40% effective recycling; and reaching an average of 15% recycled content across packaging portfolios Kenya Plastics Pact, 2021. The pact has identified priority materials for elimination, including polystyrene packaging, disposable

plastic cutlery, and plastic straws, and has developed design guidelines to improve recyclability and strengthen recycling infrastructure.

In January 2025, Kenya joined the National Plastic Action Partnership (NPAP) established by the Global Plastic Action Partnership, aiming to accelerate circular solutions while supporting economic development and job creation Global Plastic Action Partnership, 2025. Together, these initiatives demonstrate strong stakeholder alignment and policy ambition. However, operational pathways and infrastructure to scale refill and reuse systems remain underdeveloped.



## 4. Policy recommendations

Building on Kenya's strong plastic regulation and existing refill familiarity can help accelerate the transition towards circular delivery models. While refill solutions such as milk ATMs demonstrate consumer acceptance, scaling these models will require clearer regulatory guidance, strategic financing, and practical support for retailers. Based on desk research and stakeholder engagement, the following recommendations are proposed for future policy frameworks.

### **Develop operational standards for refill systems**

Unclear and fragmented regulations remain a key barrier to scaling refill solutions in Kenya. Existing frameworks were largely designed for sealed products and do not yet fully address bulk dispensing or reusable packaging.

Responsibilities are also divided across agencies and public health authorities. Developing coordinated national standards and implementation guidelines - potentially led by KEBS in collaboration with industry associations - could clarify hygiene requirements, operational procedures, and liability across the value chain.

### **Provide structured compliance pathways for refill businesses**

Many businesses are willing to comply with emerging refill regulations but lack clear guidance on how to do so. In practice, enforcement can occur before companies fully understand regulatory requirements or have the capacity to comply. Introducing structured compliance support such as

phased implementation timelines, regulatory guidance, and advisory support for manufacturers and retailers could help businesses transition towards refill systems while maintaining consumer safety.

### **Use EPR financing to support refill infrastructure**

Refill systems require significant upfront investment in dispensing technologies, logistics, and maintenance.

Roundtable participants highlighted that refill providers often absorb equipment costs while retailers are reluctant to purchase refill machines. Kenya's evolving EPR framework offers an opportunity to strengthen incentives for refill and reuse through pooled financing mechanisms and industry collaboration. Aligning EPR funds and circular economy initiatives with refill pilots could improve the financial viability and business case of prevention-focused solutions.

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