E-waste Regulations and the Role of Producers in Development and Implementation
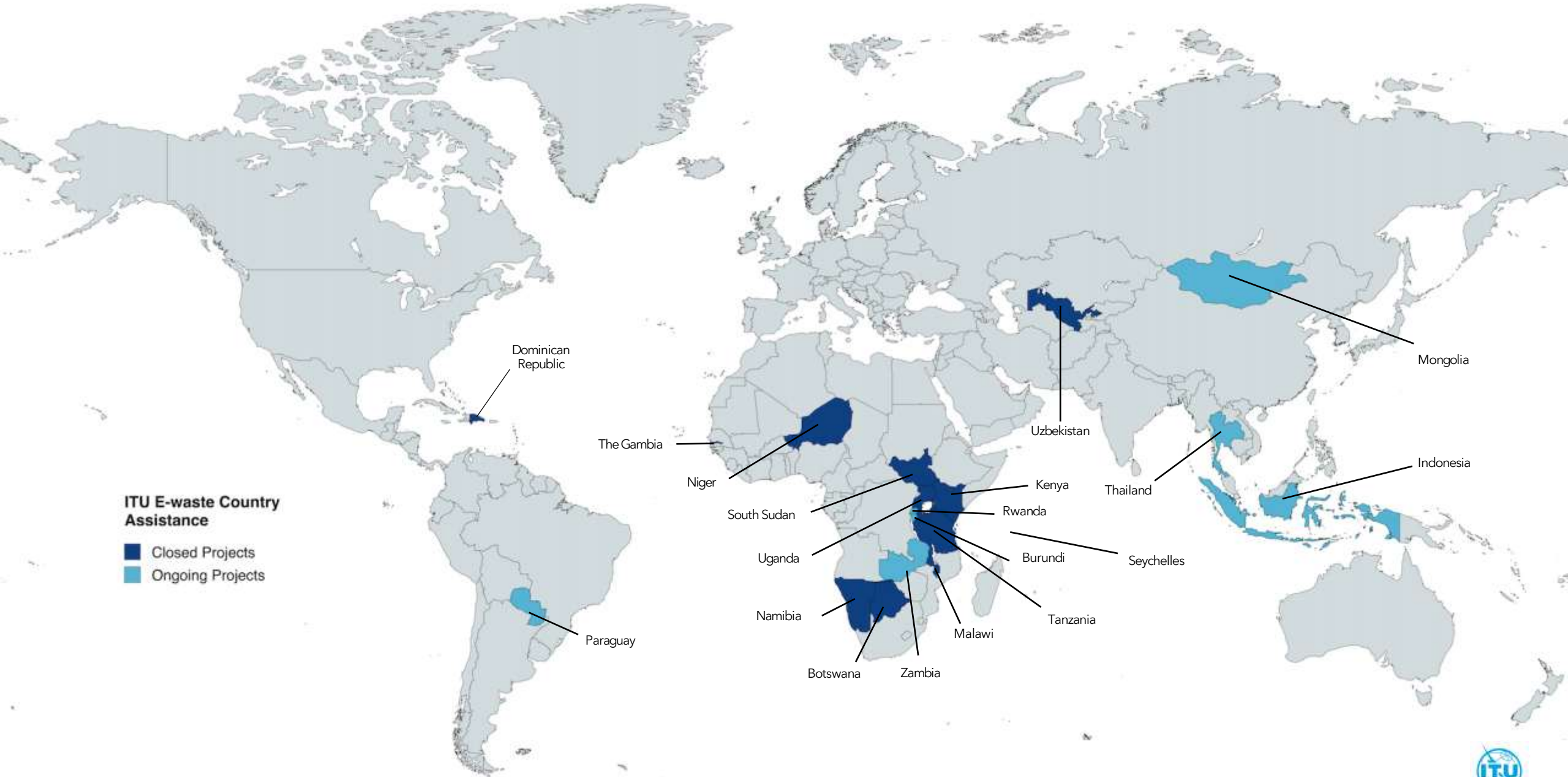
Garam Bel
International Telecommunication Union (ITU)

24th March, 2025

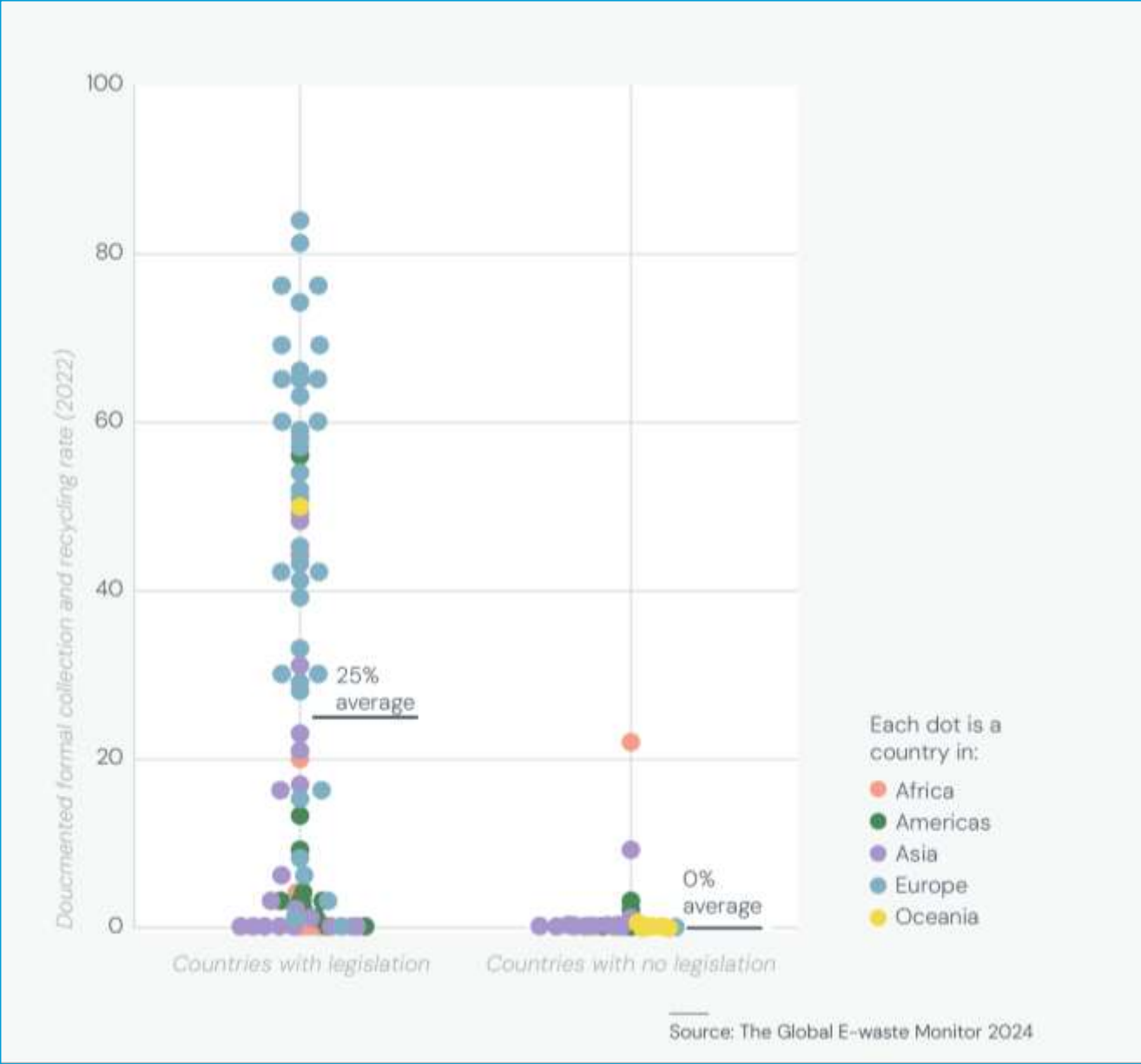**ITU E-waste Country Assistance**

- Closed Projects
- Ongoing Projects

Dominican Republic

Paraguay

The Gambia

Niger

South Sudan

Uganda

Namibia

Botswana

Zambia

Malawi

Kenya

Rwanda

Burundi

Tanzania

Uzbekistan

Mongolia

Thailand

Indonesia

Seychelles

Legislation Impact

Countries with legislation on average achieve a collection and recycling rate of 25%.

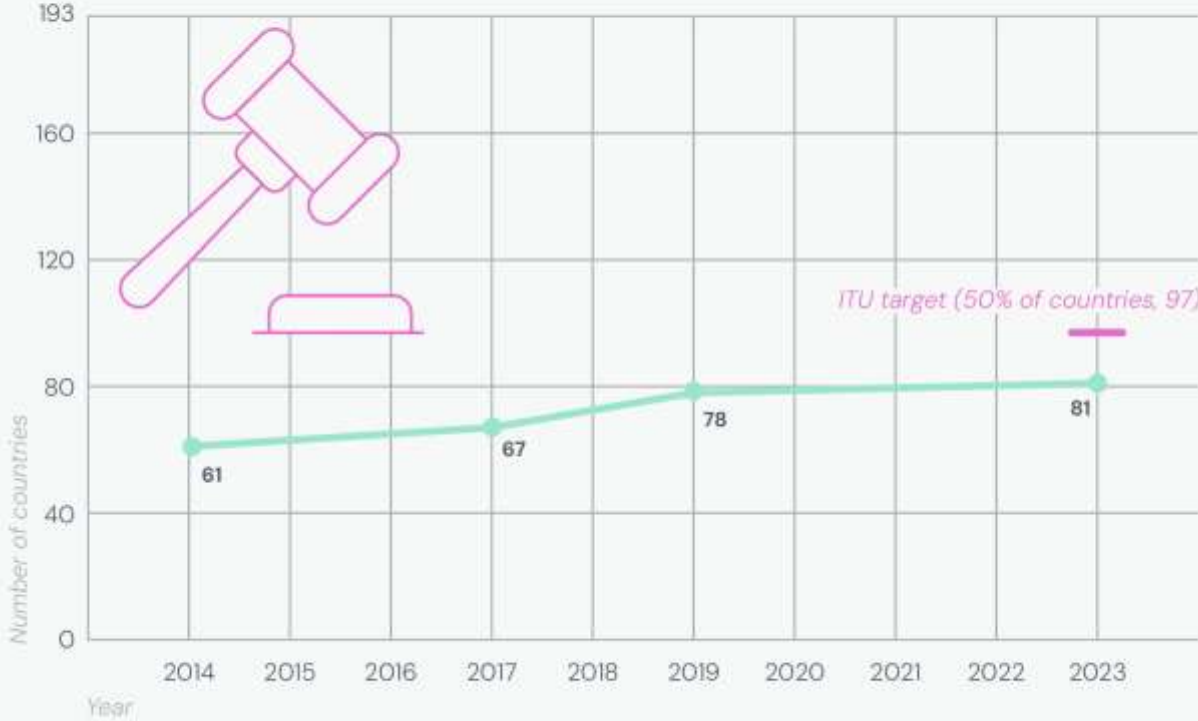**For the majority of those with no legislation, this rate is close to 0%.**

Bénédicte Kurzen / NOOR for Fondation Carmignac

Doucmented formal collection and recycling rate (2022)

25% average

0% average

Countries with legislation

Countries with no legislation

Each dot is a country in:
- Africa
- Americas
- Asia
- Europe
- Oceania

Source: The Global E-waste Monitor 2024

Legislation Importance

Figure 14. Number of Countries with E-waste Legislation, Policy or Regulation

81 countries have adopted e-waste policy, legislation or regulation.

67 countries have legal provisions on EPR for e-waste.

36 countries have provisions on e-waste recycling rate targets.
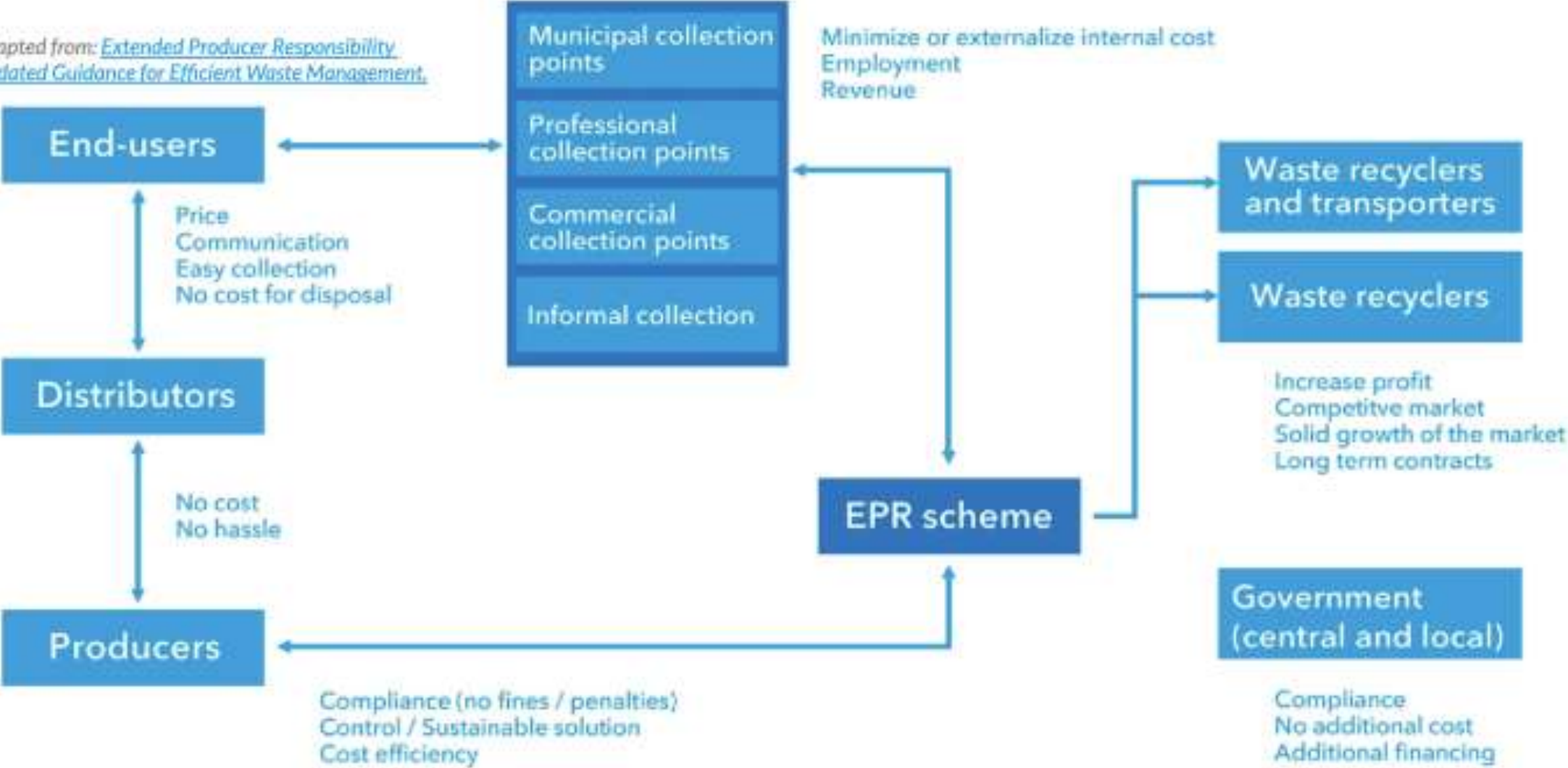
46 countries have provisions on e-waste collection rate targets.

Source: The Global E-waste Monitor 2024

Generally, presence of legislation tells us whether environmentally sound e-waste management has occurred.

Typical Extended Producer Responsibility

Adapted from: *Extended Producer Responsibility Updated Guidance for Efficient Waste Management.*

End-users

Price
Communication
Easy collection
No cost for disposal

Distributors

No cost
No hassle

Producers

Compliance (no fines / penalties)
Control / Sustainable solution
Cost efficiency

Municipal collection points

Professional collection points

Commercial collection points

Informal collection

Minimize or externalize internal cost
Employment
Revenue

EPR scheme

Waste recyclers and transporters

Waste recyclers

Increase profit
Competitve market
Solid growth of the market
Long term contracts

Government (central and local)

Compliance
No additional cost
Additional financing

Key Stakeholders Groups

Consultation and participatory approach to the development of law.

Producer Responsibility Organisation:
- AKA Compliance Scheme.
- For-profit.
- Not-for-profit.
- Single-PRO.
- Multiple-PRO.
- Sectoral-PRO.

Producer:
- Importer.
- Distributor.
- Manufacturer.
- Re-Assembler.
- Retailer.
- Distance Seller

Government
- National.
- Local.
- Affiliated Institutions.

Waste Manager:
- Registered dismantlers, recyclers, collectors etc.
- Informal sector operators.

Retailer
- Brick and mortar or online seller.
- Producer.

Consumer:
- Bulk (Government / Companies).
- Individual.

Civil Society
- Non-governmental organisations.
- Community-based institutions.

Academia:
- Universities.
- Research institutions.
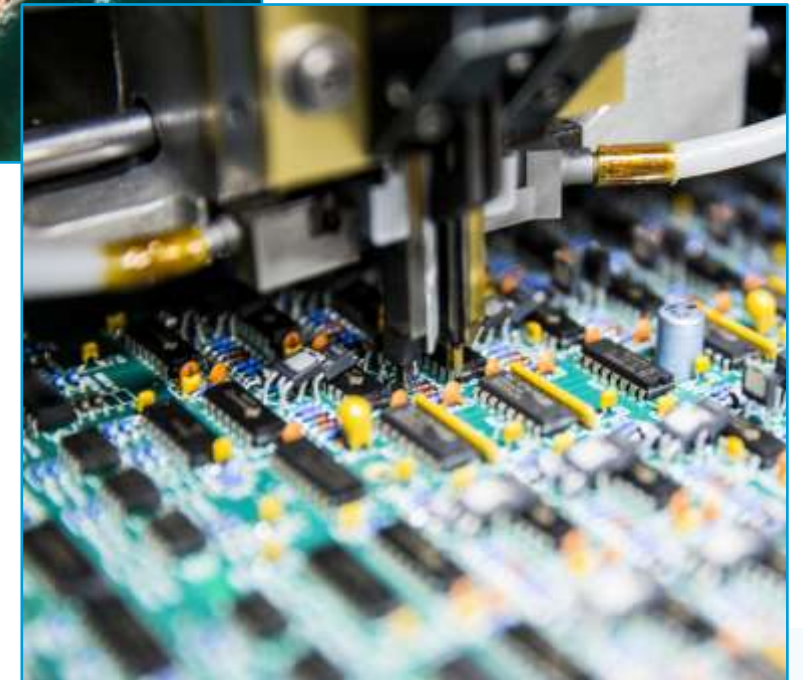
Defining a Producer

Common themes:

- The entity that "introduces".

- Manufacturer, importer, distributor, brand owner, franchisee, assembler, retailer.

- Commercial manufacture, conversion, refurbishment, import (new and used).

- Natural, legal persons.

Some differences:

- Sale, donation, gifts, inheritance, professional.

Emerging issues:

- Distance sellers with no legal representation in the jurisdiction of placing on the market.

Clear Regulation

- Leave no room for interpretation.

- With clarity, barriers can be reduced, and efficiency improved.

- Stakeholders must know what their role is (including government stakeholders).

- Regulations say "what", "when" and "who".

- Accompanying guidelines say "why" and "how".

Financing EPR

- Financing can be managed by either government or producers.

- Who pays, who collects and the methodology to written in regulation.

- The applicable penalties must also be written in law.

- The separation of registration and of payment or their combination, must be clearly guided.

Questions covering financing:

☑ What is the financing mechanism(s) applied?

☑ What is the frequency of payment?

☑ Who pays whom?

☑ What is the financial flow and what will the fee/tax/levy to be collected support?

☑ Will penalties for non-compliance be higher or lower than fees?

☑ What is the basis of fees and the methodology to calculate the amount to be paid?

Implementing EPR in Rwanda

2021 – 2023
ITU – UNEP

- Harmonization of legal instruments for e-waste
- Study on financial mechanism for EPR implementation
- Awareness campaign to increase return of end-of-life electronics

2022 – 2023
ITU – GIZ

- Legal analysis of regulatory framework and stakeholder consultation
- Review of business processes for registration and fee payment for EPR
- Alignment of regulations (RURA and RICA) related to EPR obligations

2023 – 2025
ITU - CST

- Finalization of RURA regulations governing e-waste management. Validation of RICA regulations.
- Preparation of budgeting tool for PRO membership fee model
- Design, architecture and piloting of EPR digital service design
- Identification of producer / PRO reporting and registration
- Preparation of draft PRO governance structure

Obligations for Producers in Rwanda

Regulation No. XX of XX Governing EEE Products in Rwanda

Article XX. Specific Obligations of the Producer Responsibility Organisation
- Comply with the targets in the regulation.
- Develop and maintain a system to collect the EPR fee from producers.
- Develop and maintain a register of its members.
- Contract for the collection and transport, dismantling and refurbishment and treatment with licensed service providers.
- Keep records of quantities along the value chain.
- Oversee the contracted service providers to fulfil contract obligations.
- Conduct communications and awareness raising activities to increase awareness about e-waste and to boost collection.
- Cooperate with different value chain stakeholders, including waste pickers and informal sectors.
- Implement transformation within those sectors with focus on women, youth and persons with disabilities.
- Produce quarterly and annual reports to the Regulatory Authority (RURA) and PRO governance board.

Implementing EPR in Uganda

Nov. 2023

Inception Workshop
- Participation of key stakeholders from private and public sector recognizing the importance of sound e-waste management in Uganda.
- Definition of the scope of implementation of EPR in Uganda.
- Facilitation of a coordinated action plan across government entities.
- Identification of areas for strengthening regulatory framework for e-waste management.

May 2024

From Policy to Action Workshop
- Participants from key government agencies and matter experts.
- In-depth review of 2019 and 2020 related National Environment Act and and waste management regulations.
- Agreement on policy interventions.
- Agreement on key stakeholders to be included in further deliberations.

Oct. 2024

Implementation Planning Consultations
- Legal consultation on proposed amendments to draft EPR regulations.
- Discussion on proposed budget for operational and implementation plan for the e-waste policy in Uganda.
- Submission of a roadmap on implementation of revised e-waste policy.
- Focus groups on EPR system financing (EPR model and fee collection, customs and system audit).

Committed to connecting the world

Thank you