E-Waste Management

Rwanda's Efforts to Environmental Protection

March 2025

Rwanda EPR system, regulation, and policy

GENERAL PROVISIONS

Purpose (*Art. 1*) Establish a legal framework for managing electrical and electronic waste in Rwanda.

Scope (*Art. 3*) Applies to all stakeholders in the electronic equipment lifecycle, including **producers**, retailers, importers, distributors, recyclers, and consumers.
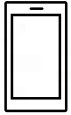
Objective (*Art. 4*) To safeguard health and the environment by minimizing electrical and electronic waste impacts, promoting reuse and recycling.

KEY DEFINITIONS (*ART. 2*)

Electrical and Electronic Equipment (EEE) (*2.3*): Devices using electricity or electromagnetic fields (e.g., smartphones, computers).

E-waste (*2.5*): Discarded or disposed EEE (e.g., old phones, broken TVs).

Producer (*2.9*): Any person or entity introducing new or used EEE into the market, whether through sale, donation, gift, inheritance, or other methods, including manufacturers, importers, distributors, and assemblers.

Take-back (*2.14*): The process where used products are returned to the producer or their representative.

Core elements of the EPR system

The Extended Producer Responsibility (EPR) is an environmental policy approach where producers are given significant responsibility. The aim is to shift the environmental costs of waste management away from governments and taxpayers to the producers and, indirectly, to consumers who purchase the products

- Legal regime
- Administrative arrangement
- Financing modalities

EPR Covered Products and Categories

1. Temperature exchange equipment:
more commonly referred to as cooling and freezing equipment. Typical equipment includes refrigerators, freezers, air conditioners, and heat pumps.

2. Screens and monitors:
typical equipment includes televisions, monitors, laptops, notebooks, and tablets.

3. Lamps:
typical equipment includes fluorescent lamps, high intensity discharge lamps, and LED lamps.

4. Large equipment:
typical equipment includes washing machines, clothes dryers, dishwashing machines, electric stoves, large printing machines, copying equipment, and photovoltaic panels.

5. Small equipment:
typical equipment includes vacuum cleaners, microwaves, ventilation equipment, toasters, electric kettles, electric shavers, scales, calculators, radio sets, video cameras, electrical and electronic toys, small electrical and electronic tools, small medical devices, small monitoring, and control instruments.

6. Small IT and Telecommunication equipment:
typical equipment includes mobile phones, Global Positioning System (GPS) devices, pocket calculators, routers, personal computers, printers, and telephones.

*Regulation Governing E-waste Management in Rwanda- Annex 1: Categories of Products **Regulation No. XX of XX Governing Electrical and Electronic Products in Rwanda-** Annex E2: List of EPR Regulated Products.

STRENGTHENING E-WASTE MANAGEMENT

The existing RURA regulation is evolving:

➡️ **CLEARER PRODUCER ROLE:**

Obligations of the **Producer Responsibility Organisation (PRO)** to manage the producers' responsibilities and ensure producers manage products throughout their lifecycle.

➡️ **ENHANCE RECYCLER STANDARDS:**

Updates to Article 22 will broaden recycler duties, strengthening environmental and health safeguards.

These updates aim to create a more sustainable, accountable framework for e-waste management across Rwanda.

STRENGTHENING E-WASTE MANAGEMENT

The new RICA regulation :

- Definition of a 'business operator' and a 'producer'.
- Scope' of the regulation in relation to EPR.
- Electrical and electronic equipment compliance requirements.
- Requirements for business operator registration and licensing.
- Disposal of electrical and electronic equipment.
- EPR regulated products.

Stakeholder Roles and responsibilities

RICA

EEE product registration

EPR business operator license (i.e., business operator license to include producer registration in EPR)

REMA/RICA

EEE Import license

RURA

Licensing of e-waste management firms (transport, collection)

PRO registration

Producers

Financial, organizational, and reporting obligations

PSF (the PRO)

Info onboarding of producers to the EPR system

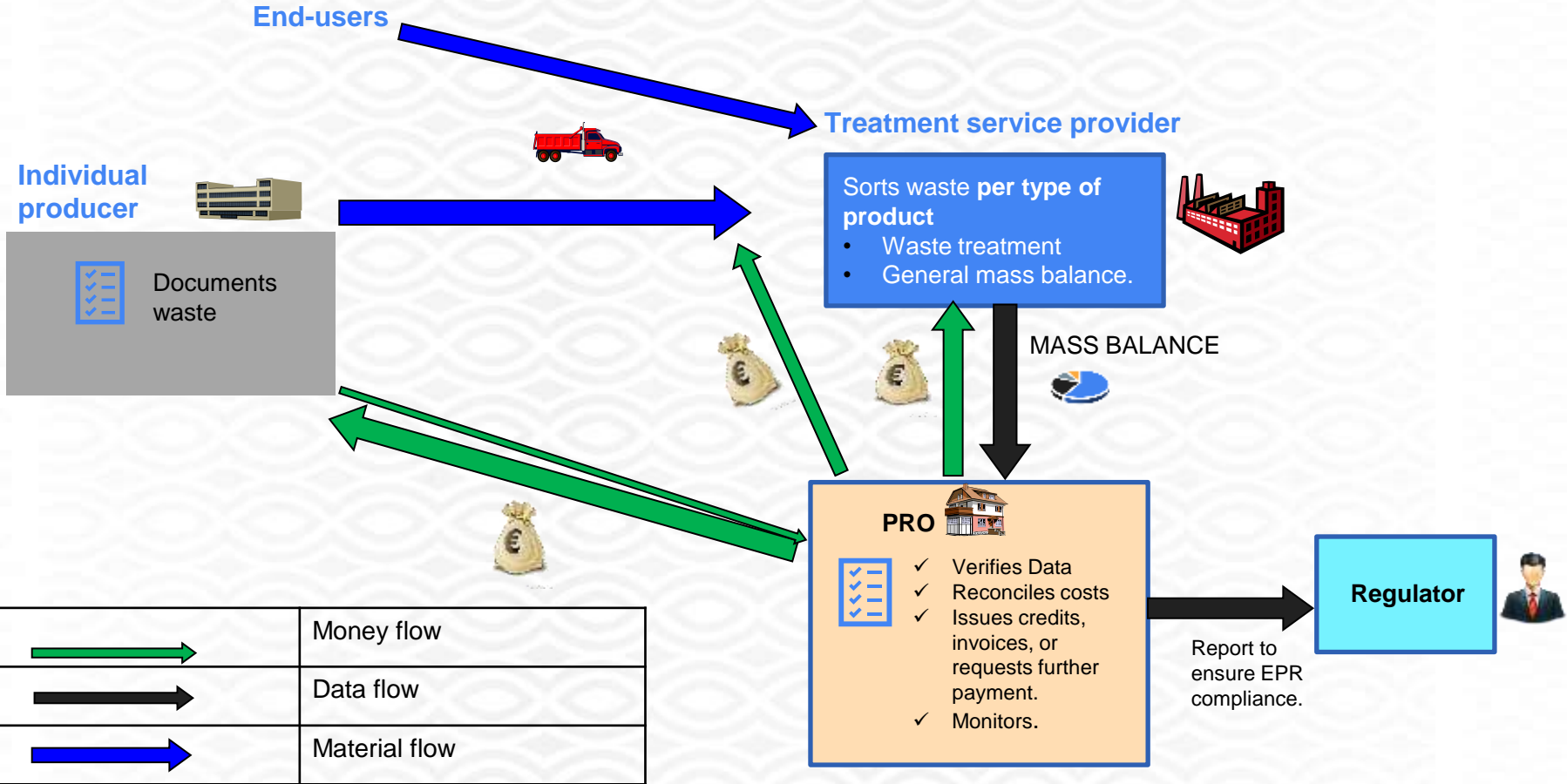EPR fee calculation, depository, and use

Regulatory reporting

Introducing PRO

Introduction to the PRO

- A **collective** EPR compliance scheme is also referred to as a Producer Responsibility Organisation (PRO).
- It collectively fulfils the EPR obligations of its members, which are all Producers.
- It is an organization of producers, often formed through an inclusive process by the producers themselves but with the support of industry organizations.
- EPR regulations justify the creation of these organizations to be formed (as a compliance requirement), as well as the conditions for them to operate. However, voluntary PROs also exist, as they offer multiple benefits beyond pure compliance.

Roles and responsibilities in a PRO

End-users

Treatment service provider

Individual producer

Documents waste

Sorts waste **per type of product**
- Waste treatment
- General mass balance.

MASS BALANCE

PRO
- ✓ Verifies Data
- ✓ Reconciles costs
- ✓ Issues credits, invoices, or requests further payment.
- ✓ Monitors.

Regulator

Report to ensure EPR compliance.

→	Money flow
→	Data flow
→	Material flow

Typical activities a PRO undertakes

Find, negotiate, and contract service providers e.g. transport, collectors, recyclers, storage.

- Monitor performance and aim to achieve collection targets.
- Establish collection infrastructure.
- Implement take back-schemes.

Implement control mechanisms to ensure member liability is limited, e.g.
- Monitor/audit recyclers worked with to ensure 0 liability of waste poorly handled.
- Ensure traceability of the e-waste collected by providing certificates.

Collect data from Producers to file their quarterly/annual reporting to regulator as per the EPR rules and for broader purposes

- Conduct awareness campaigns among consumers, to increase collection and limit E&S risks;
- Deliver training across the value chain

Enable short, mid, and long-term research and R&D activities that can support members in more efficient e-waste management

- Lobby/be an interface with authorities
- Develop standardised metrics for scoring recyclers
- Explore new take-back and collection models
- Evaluate including other waste streams

PRO budget – how it works

Costs

- End-user awareness raising and collection campaigns (including buying back e-waste if needed)
- Payments to e-waste management service providers for collection, transport, treatment/recycling, storage. **(majority of costs!)**
- PRO HR, at least salary for the PRO HR, General Manager
- Any other administrative, marketing, legal, travel, advisory, training, data access, audit costs that arise from the existence of the PRO
- Any data infrastructure (e.g. software or hardware)

Income

- EPR fee payments from all PRO members, which are all producers in Rwanda

The PRO is

- A member-based organisation which efficiently and collectively handles the e-waste obligations of its members who are all Producers, by **coordinating and centralising efforts.**

- An organisation set up to ensure collective compliance with an EPR regulation, **optimizing for both cost and quality delivered** to individual members who are all Producers.

- A **self—sustaining enterprise** that should not require external funding (grants, loans) once set-up.

- A tool for a **united private sector voice** on the topic of e-waste management.

The PRO is NOT

- A purely for-profit enterprise (usually). It is a **non-profit organization** and its members are its shareholders (usually). It could be quasi-government-non-profit (rarely) or for-profit organization (sometimes)

- **A service provider to which a Producer is just a customer**. Producers are members and drive the main decisions of the PRO.

- **A recycler or waste transporter**. It coordinates service providers and negotiates prices but is not engaging directly in these activities (which require licenses)

Update on Rwanda/PSF PRO activities

2024

- **Legally incorporated the PRO** within the Business Research Centre of the Private Sector Federation (BRC of PSF)
- **Developed EPR fee calculator and manual for internal use** in the PRO/PSF, with funding from ITU
- **Established first communication channel with RRA**:
    - Gathered list of all EEE producers in Rwanda;
    - Gathered data on POM EEE in the last 5 years;
- **Engaged with licensed e-waste management service providers**, asking for data/pricing of services
    - Got updated list from RURA
    - Got pricing from 1 e-waste management service provider

Outlook to 2025

- **Starting to implement pilot collection project,** with support from African Circular Economy Facility of African Developmental Bank (AfDB's ACEF) (next slides)

- **Work with ITU to support the ongoing project for setting up the EPR system (incl. policy) in Rwanda** (next slides)
- **Work on firming the formal relationship with RRA** (potentially a formal data sharing agreement or MoU)