



Rwanda - Validation Workshop for Regulations on Electrical and Electronic Products and Producer Compliance

March 25, 2025

Kigali Marriott Hotel, KN 3 Ave, Kigali, Rwanda

**Organized by: International
Telecommunication Union**

WORKSHOP SUMMARY REPORT



1. Background

This validation workshop is a crucial event aimed at reviewing and validating the proposed technical regulations linked to the Extended Producer Responsibility (EPR) system for Rwanda. A series of projects, initiated in 2019, focused on the development and implementation of post-consumer management of electrical and electronic equipment (EEE) in Rwanda. Despite having an e-waste regulatory framework in place, practical implementation has been challenging, with low e-waste collection and recycling rates in Rwanda. To address these issues, the Government of Rwanda, through the Ministry of Information, Communication, Technology and Innovation (Min ICT), has sought technical assistance from the International Telecommunications Union (ITU) to design and implement an effective EPR system. The proposed technical regulations under the custody of the Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA) aim to provide a comprehensive framework for the registration of EEE producers in Rwanda. These regulations will ensure compliance with safety and energy efficiency of EEE but notably also the capture of producer information through their registration to the EPR system. This will thereby close the gap of freeriding (non-compliant) companies. This activity is sponsored by the Communications, Space and Technology Commission (CST) of the Kingdom of Saudi Arabia.

2. Workshop Objectives

The objectives of the RICA technical regulations validation workshop were the following:

- To provide an overview and rationale of the proposed technical regulations ensuring all participants have a clear understanding of their scope and intent.
- To facilitate open discussions and gather feedback on the draft regulations, focusing on key areas such as safety, energy efficiency, and extended producer responsibility.
- To engage stakeholders in breakout sessions for detailed analysis and collaborative problem-solving.
- To consolidate feedback and outline actionable next steps for the finalization and implementation of the technical regulations.
- To foster networking and collaboration among participants, enhancing the collective efforts towards effective regulation and compliance.

3. Summary Report

3.1 *Opening session and draft technical regulations overview*

The meeting was opened by the Acting Director General of RICA Ms. Antoinette Mbabazi. In her opening remarks, Ms. Mbabazi told the participants that the work of developing the technical regulations started in 2020 and underwent various changes to accommodate various stakeholder input and concerns. She said it was thus a great milestone for RICA that the validation of these technical regulations was happening. She wished the participants fruitful deliberations and looked forward to receiving comments on the draft technical regulations. A series of presentation were then made to bring to speed with the contents of the draft technical regulations, addressing:

- Safety requirements presented by RICA
- Minimum Energy Performance (MEPs) requirements – presented by the United Nations Environment Programme (UNEP)
- The Extended Producer Responsibility – presented by ITU

Discussion Points

- MEPs requirements need to align with existing regional standards and encourage states within the region to develop regulations similar in order to domesticate the regional standards.
- The technical regulations should align with the existing 2022 regulations governing Trade of Used Electrical and Electronic Equipment.
- Accreditation and laboratory capacity of the country to test and provide support to the technical regulations.
- Enforcement and compliance system to address free riders – including the challenge of refurbished products sold as new and counterfeit EEE.
- The government's position on e-mobility including the management of e-waste from e-mobility.
- The regulation of online dealers that place EEE on the Rwanda market through direct purchase by consumers.
- The designation of the competent authority to give authorisation for the importation of EEE for personal use.

3.3 Comments and proposed changes on the draft technical regulations

Table 1 gives a summary of the participants comments and proposed changes on the draft technical regulations made during the workshop:

Table 1: Comments to draft technical regulations

Article	Issue	Proposal
Article 2	The definition of "Import Permit" is missing, which could lead to varying interpretations.	Add definition for "Import Permit". Suggested definition provided in draft document.
Article 4	It is unclear whether products must comply with all or only some of the requirements.	Suggested text provided in draft document.
Article 21	The phrase "Products other than computers imported for personal use" has raised questions about why computers are excluded from this provision.	Please, check if this is correct or if it needs any clarification/modification.
Article 21	The term "individual or company" has led to discussions on whether companies should be considered importers for personal use.	Please, check if this is correct or if it needs any clarification/modification.
Article 21	The text "...the importer should declare in writing that imported items are for personal use. Upon approval by the competent authority..." was interpreted during discussions as a declaration made at the point of entry and reviewed by customs (competent authority). Then, the assessment would be based on customs' record of imported products (limited to two identical units per year) and other criteria, without requiring an Import Permit from RICA.	Consider rewriting the article for better interpretation if needed. For the practical implementation of this article, it should be defined if the declaration will be in written, or in digital format, and in case of digital, if it will be in the general system for the regulation or others.
Article 22	Depending on the final decision for Article 21, further adjustments may be necessary for Article 22.	Check
Article 24	The title "Validity of Import Permit for Unregistered Products" suggests a time limit for such permits. However, there is no corresponding article addressing the validity of import permits for registered products.	If the validity is the same for registered and unregistered products, it was suggested to change the name of the Article to "Article 24: Validity of Import permit"
Article 24	Point 1 of this article appears to contain two separate requirements that may be separated for clarity.	For clarity, it was suggested separating the requirements. Suggested text provided in draft document.
Article 25	Point 6 of this article refers to the requirements of the Technical File when the model declaration follows one of the options described in Point 5. However, it currently references only Point 5(a) rather than all applicable options.	It was suggested integrating point 6 in 5 and adding also a short description of what the declaration of identity is. Suggested definition provided in draft document.

Article 33 and 34	Point 3 of Article 33 and Point 1 of Article 34 are similar. Additionally, some ambiguity remains regarding who is responsible for attaching the label to the equipment. Industry representatives stated that while they can place the label on the box, attaching it to each unit would require significant effort. It was suggested—and agreed by the audience—that dealers should be responsible for labelling units displayed to consumers.	It was suggested removing point 3 of Article 33 and bringing it to point 1 of Article 34. Rewrite point 2 of Article 34. Suggested text provided in draft document.
A.1.5 in Annex A	The GWP limits for refrigerant classification on the energy label should specify “equal to or below” rather than just “below.”	See suggestions in the attached document.
A.2.5 in Annex A	Although the regional label includes colour coding based on refrigerant type, it is omitting GWP limits for classification. The U4E team consulted with one of the engineers involved in the regional standard, who acknowledged this oversight. After discussion, it was agreed that for refrigerators, green will indicate refrigerants with a GWP of 20 or below, and red will be used for refrigerants with a GWP above 20 (no orange category). The final version of the regional standard will incorporate this classification according to our contact.	See suggestions in the attached document.
Add A.1.7 and A.2.7 in Annex A	During the Validation of the Technical Regulation, there was support for group requirements across regulations whenever possible. Given that Rwanda has signed the Kigali Amendment, requiring a phasedown of high-GWP HFCs and REMA will need to address this sooner or later, this presents an opportunity to incorporate refrigerant requirements into the current regulation. Including such provisions now would align with the regional and standards and is also in the regulation purpose by controlling electrical equipment that uses environmentally harmful substances.	In this sense, it was suggested to add sub annexes A.1.7 and A.2.7 to apply the GWP and ODS requirements of the regional standards FDEAS 1213:2024 (ACS) and FDEAS 1214:2024 (Refrigerators). Suggested text provided in draft document. REMA to confirm if they want to apply these requirements in the Technical Regulation.
Annex C.3	There is still one reference to the old standard RS 437-1 that needs to be updated.	Remove RS 437-1 and add RS EAS 1064-1 and RS EAS 1064-2 in the National Standard column. Suggested text provided in draft document.
Annex C.3	While the technical regulation aligns with national and regional energy efficiency standards, it includes additional clarifications, such as expanded definitions	Consider referencing the Annexes of the regulation itself in the column of National Standard.

	and an adjusted application date to align with the publication of the regulation.	Suggested text provided in draft document.
All document	The regional standards for air conditioners and refrigerators were referenced as FDEAS 1213:2024 and FDEAS 1214:2024 (Final Draft) because the final publications are not yet available.	Remember that the final publication of the technical regulation should reference the regional regulations as EAS 1213:2024 and EAS 1214:2024

3.4 Next steps

Ms. Jeanne Turagiwenimana on behalf of the Acting DG of RICA informed the meeting that following the validation meeting, the RICA team will compile the comments and then submit the document to the Rwanda law reform Commission for approval. Once the approval is given, the draft technical regulations will be translated into all the official languages and then signed into law.

3.5 Closing remarks

Ms. Deborah Nibagwire from REMA thanked the workshop participants for a lively and enriching engagement and assured the participants that their input would be considered and incorporated into the final draft. She paid tribute to international experts that supported the work and looked forward to further support from these international partners. She thereafter closed the meeting.