



Solid waste management related legislation: Analysis of its adequacy for implementation of extended producer responsibility schemes in Tanzania

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Abstract

This study assesses the adequacy of the existing legislation for the implementation of Extended Producer Responsibility (EPR) schemes in Tanzania. It is moved by the fact that The Environmental Management (Control and Management of Electrical and Electronic Equipment Waste) Regulations, 2021^[9]; The Environmental Management (Hazardous Waste Control and Management) Regulations, 2020; Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020^[11]; The Environmental Management (Solid Waste Management) Regulations, 2009^[13] and Environmental Management Act, Cap 191, all have provisions that require the implementation of EPR schemes. However, there are inadequate efforts for the implementation of EPR schemes. The study is guided by the EPR policy instruments which include Product take-back mandate; Recycling targets; Advanced Disposal Fees (ADFs); Deposit Refund Scheme (DRS); Landfill restriction; and Information based Instrument. Questionnaires, observations, interviews, and documentary reviews formed the research data collection techniques. The study used descriptive analysis to analyze its variables. The findings show that the existing legislation is inadequately equipped to achieve the intended goals of the EPR principle. The applied instruments are mainly administrative and information-based. The economic instruments such as ADFs, ARFs, Material Tax, DRS and Regulations, and performance standards instruments are inadequately applied. The study recommends; the establishment of Specific EPR Regulations combining all EPR policy instruments such as Administrative; Economic, Regulatory, and Information-based instruments; clear selected waste categories, and a clear definition of producers in relation to the implementation of the EPR scheme.

Keywords: extended producer responsibility, EPR, solid waste, solid waste management, legislation, and Tanzania

Introduction

Tanzania like many other developing countries has been experiencing high rate of urbanization that mismatched with the capacity of Local Government Authorities (LGAs) to provide various services (Omar, 2018)^[5]. The trend indicates that percentage of the population living in urban areas has been increasing from 5 percent in 1967 to 13 percent in 1978; and from 21 percent in 1988 to 27 percent in 2002 (URT, 2006)^[15]. Further, the Urban population has reached 29.1 percent in 2012 (Wenban-Smith, 2015)^[18]. Urbanization rate in Tanzania has been accompanied by several challenges including the increase in waste generation which mismatched with capacity of LGAs to manage.

The amount of solid waste generated in Tanzania is nearly 7 million tons annually (URT, 2022)^[8] whereas, the composition of garden and organic waste (67%), papers (11%), plastic (7%), glass (4%), metal and tin (1%), textiles (2%) and ash (8%). In addition, other waste fractions that may be encountered include e-waste, used lead acid batteries and used tyres (URT, 2020a)^[12].

Further, it is projected that by 2030 the annual MSW generation will be more than double of the current amount (URT, 2020a)^[12]. However, waste collection and transportation remains of limited coverage and largely inadequate in all urban areas in the country (UDSM, 2018)^[7]. The average collection rate in the country estimated to be less than 35% (URT, 2022)^[8]. This attributed to several factors including; inadequate waste minimization initiatives, inadequate contract management and inadequate financing (URT, 2022)^[8].

Moreover, recycling of MSW, which is largely informal, is only about 5-10% of the total MSW generated and primarily involves plastics, paper, scrap metal, aluminum cans and glass (URT, 2020a)^[12]. Very few households segregate waste at the household level (ibid). Thus, more than 90% of MSW in Tanzania is believed to be disposed in an unsatisfactory manner mostly in open and poorly operated dumpsites across the country with exception of only 8 Local Government Authorities having sanitary landfills (URT, 2022)^[8]. These include Arusha, Dodoma, Mbeya, Mwanza, Tanga, Moshi, Kigoma and Mtwara.

This has led to negative impacts to both human health and environment including: emission of poisonous chemicals such as furans and dioxins which can be associated with a wide range of adverse health effects

including endocrine disruption, reproductive and immune dysfunction, neurobehavioral disorders, cancer, organ damage and death. Also, improper solid waste disposal is associated with flooding incidences due to trapping of waste in bridge and culvert openings which lead to economic loss especially through destruction of infrastructure and loss of lives.

In order to address waste management issues in the last two decades, waste management policies were developed in several countries aimed at reducing the environmental impact of products, with the main focus on recycling and reuse (Ferrão *et al* 2008).

The principle of “Extended Producer Responsibility” (EPR) has been at the core most of such policies. The principle based on the polluter-pays-principle, which geared towards increasing accountability of producers by making them responsible for the environmental impacts associated with their products throughout their life cycle (Nahman 2010) ^[1].

In Tanzania, the efforts to address waste management challenges have also include the introduction of Extended Producer Responsibility (EPR) principle in several pieces of legislations including; The Environmental Management (Control and Management of Electrical and Electronic Equipment Waste) Regulations, 2021 ^[9]; The Environmental Management (Hazardous Waste Control and Management) Regulations, 2020; Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020 ^[11]; The Environmental Management (Solid waste management) Regulations, 2009 ^[13] and Environmental Management, Cap 191. These pieces of legislations cover different types of waste such as hazardous waste, municipal solid waste, plastic waste, and electronic-waste (e-waste). However, despite having legislation there is no any meaningful EPR scheme implemented in the country as of current.

Therefore, it is the interest of this study to assess the adequacy of these pieces of legislations for the implementation of EPR schemes in Tanzania.

The Concept of Extended Producer responsibility (EPR) and its Goals.

The Extended Producer Responsibility is “an environmental policy approach in which a producer’s responsibility for a product is extended to the post-consumer stage of a product’s life cycle” (OECD, 2001) ^[6].

According to Watkins and Gionfra (2019) ^[17], the EPR policy approach has two primary environmental goals, which are very fundamental in achieving circular economy. The first goal is to incentivize producers to design more resource efficient products with lower environmental impacts (often referred to as green design or ‘eco-design’) and the Second is to ensure effective end-of-life collection and environmentally sound treatment of collected waste products, and to create higher rates of reuse and recycling (ibid). Thus, EPR schemes can help to address issues related to resource consumption and growing waste generation. This implies that EPR can be a basic policy principle that promotes the 3Rs (Reduce, Reuse and Recycle) of products with a particular focus on the responsibility of producers through various EPR policy instruments.

EPR Policy Instruments

There are several different instruments governing EPR schemes. This include: administrative instruments; economic and market instrument; Regulation and performance requirement and information based instruments (Watkins and Gionfra, 2019) ^[17].

Product take-back mandate and recycling rate targets

With this approach, Government provide for a provision which insist for the producer to take back waste arising from the end of life of the products. Through the product take back approach, Producers are obligated to take back their products from consumers when they become waste and are held responsible for their end-of-life management. Combined with such mandates, the act of take-back the product after its’ useful life, is more likely to be recycling or waste diversion target. In order for the mandate to be in force, the Government may require that each producer meet an established recycling rate goal for the waste emanating from its products.

Tradable recycling credit scheme

In this approach instead of each individual producer to meet the same target, tradable credits are issued and firms are allowed to trade among themselves. Although industry-wide recycling rate target set by Government might be met, but some producers would do better than the target and others worse. Therefore, in such situation Producers that exceed the required target, may trade with producers who have not met the target.

Voluntary product take-back with recycling rate targets

This approach involves voluntary arrangement whereby, firms agree to organize a take-back system for their products and set their own recycling goals. There is no law or Government regulation mandating them to comply and no penalties for not meeting the goals.

Advance Disposal Fee (ADF)

An ADF is a tax or charge levied at a time a product is sold, and often used to cover the cost of managing of the end-of life of product including safe disposal or recycling. In ADF approach, consumers may be required to pay a fee at the point of purchase based on estimated collection, recycling and treatment costs, which is used to finance end-of life management of the products.

Producers may be responsible for collecting the charges and remitting it to the public authorities, but are otherwise not necessarily involved in the collection or disposal of waste. In some context, ADFs are imposed on importers and manufacturers of products that are hazardous and more difficult to recycle.

ADF are normally assessed per unit of the product sold but can also be assessed on weight based and could be visible to consumer when he/she purchases the product (i.e. a separate line item on the bill or they can be assessed upstream on producers and later be incorporated in the product retail price).

Advanced Recycling Fees combined with a recycling subsidy

An ARF is a tax or charge levied at a time a product is sold, and often used to cover the cost of recycling. An ARF raises money that can be used in a variety of ways. The incentive effects of the policy are highly dependent on both the type of ARF and what is done with the revenues. If a “back-end” recycling subsidy is used – either a subsidy per unit of the product recycled or per weight of material recycled – this leads to quite a different policy instrument than one in which the ARF revenues are used to cover the costs of managing waste or used to cover infrastructure costs, in a lump-sum fashion.

Deposit Refund Schemes (DRS)

DRS is a scheme where a consumer pays a deposit when they purchase an item and/or the deposit is later refunded when the product or its packaging (e.g. a bottle) is returned for reuse, recycling or safe disposal. Producer (or retailers) may be responsible for collecting the deposit, and for end-of life collection and refund.

Landfill restriction

This involves ban disposal of particular items in landfills (or incinerators). This normally involves waste such as Waste Electrical and Electronic Equipment including but not limited to fluorescent light bulbs and batteries, refrigerators, dishwashers, computer monitors; hazardous waste including pesticides packaging, paints, tyres; and medical waste.

Recycling investment tax credits

Recycling investment tax credits is where the Government gives credit to income taxes to anyone who invests in recycling infrastructure. Thus, this is like a direct subsidy to capital so as to incentives investment in recycling sector.

Information based Instrument

This approach involves provision of information to consumers and/or producers to support the implementation of EPR. This may include imposing information requirements on producers such as reporting requirements, labelling of products and components, and communicating to consumers about producer responsibility, waste separation and informing recyclers about the materials used in product (Watkins and Gionfra, 2019) ^[17].

Methodology

The methodology of this study involves literature review, direct observation, and interviews. On the case of literature review the study adopted theoretical literature reviews against other type of literature reviews such as systematic, scoping, argumentative, and integrative. The choice of theoretical literature review was based on the fact that the study involved analyzing of the theories, concepts and phenomenon related to the implementation of the EPR Schemes within the existing legal framework in Tanzania for establishing the adequacy of such legislation for the implementation of the EPR schemes.

Additionally, the study, also held a Focus Group Discussion with 21 (86%) Regional Environmental Experts (REMEs); Director of Nipe Fagio (NGO involved in the Waste and Brand audit in Tanzania); Representative of Coca Cola Kwanza Company Ltd; Representative from Federation of Tanzania Industries (CTI); 5(83%) of Environmental officers from 5 Cities (Dar es Salaam, Dodoma, Mwanza, Arusha and Mbeya); Representatives from Ministry Responsible for Local Governments and Ministry responsible for Industry and Trade; Representative from National Environmental Management Council and Representatives from Vice President Office-Division of Environment to assess the compliance of the existing legislation on the implementation of EPR schemes.

Further, the interviews were also conducted to the representatives from Mohamed Enterprise Tanzania Ltd; Game Super market, Shoppers Super markets, Grano Coffee, Pugu Kinyamwezi dump manager and waste pickers and waste buyers at Pugu Kinyamwezi dump site.

Moreover, direct observations were conducted at Pugu Kinyamwezi dump site and shoppers and Game Super markets to analyses the effectiveness of the existing EPR related legislation. The Study used descriptive analysis to analyses the collected data.

Findings and discussion

Introduction

The implementation of EPR is based on the principle of polluter pay which requires that any person causing adverse effect on the environment to pay in full social and environmental costs of avoiding, mitigating, and or

remediating those adverse effects as highlighted in Section 7 (3) (d) of the Environmental Management Act, Cap 191.

Additionally, Section 4(1) of the Environmental Management (Hazardous Waste Control and Management) Regulations, 2021 ^[10] requires the application of principle of EPR in the management of hazardous waste in Tanzania. The Regulations go further by defining EPR as a policy approach which requires that a person producing or importing a product should internalize environmental costs in the production of the products and in whole life cycle of such product.

However, to implement EPR principle there are various EPR policy instruments that can be applied and these include: Product take-back mandate and recycling rate targets; Tradable recycling credit scheme; Voluntary product take-back with recycling rate targets; Advance Disposal Fees (ADFs); Advanced Recycling Fees (ARFs) combined with a recycling subsidy; Deposit Refund schemes (DRS); Landfill restriction; Recycling investment tax credits; and Information based Instrument.

Therefore, the analysis of the adequacy of Environmental Management Act, Cap 191; Environmental Management (Solid Waste Regulations), 2009 ^[13]; The Environmental Management (Hazardous Waste Control and Management) Regulations of 2021 ^[10]; Electronic Communication Equipment Standards and E-waste Management Regulations of 2020 ^[11] on the implementation of EPR in Tanzania is made based on the EPR policy instruments and other factors including the scope of the producers, the priority waste category and institutional challenges in implementing EPR schemes.

Product take-back mandate

The Environmental Management (Control and Management of Electrical and Electronic Equipment Waste) Regulations, 2021

Section 7 (2) (i) of the Environmental Management (Control and Management of Electrical and Electronic Equipment Waste) Regulations, 2021 ^[9] require manufacturers and importers to institute take back schemes for electrical and electronic equipment and their wastes. Additionally, section 52 (1) (b) and (c) requires manufacturers or authorized dealers to ensure that e-waste generated from the end of life of their products is collected in line with the principle of EPR and channeled to a licensed dismantler or recycler and (c) ensure that collection centres or take back systems are set up either individually or collectively. Further, the Regulations clearly stipulate that a manufacturer or authorized dealer of electrical and electronic equipment who fails to discharge his responsibilities including that of section 52 (c) of setting up collection centres to have been committing an offence and, upon conviction, shall be liable to a fine of not less than five million shillings and not exceeding one billion shillings or imprisonment for a term of not less than seven years or both fine and imprisonment.

However, In an interview with officers from Tanzania Telecommunication Authority, National Environmental Management Council, Vice President Office-Division of Environment and 21 (86%) of Regional Environmental Management Experts it was found that there is no any established take back centre for collection of either electronic communication equipment in particular or Electrical and Electronic Equipment in general all over the country.

Additionally, section (53) (1)(a) requires consumers of electrical and electronic equipment to ensure that e-waste they have generated is channeled to a dealer in e-waste or is returned through take back services to the manufacturer or authorized dealer. However, the general observation in various parts of the country as well as interviews with Chairman of the Tanzania Recyclers Association, Director of Libegreen recyclers, 21 Regional Environmental Experts, and 5 environmental officers from 5 cities in the country it was found that there is no any compliance to the requirement of these Regulations. This was attributed to the lack of take back centres contrary to the requirement of section 52 (c).

Again, as indicated in section (53) (1)(a) consumers have given the alternative to either channeled their generated e-waste to manufacturers or to an authorized dealers. In these Regulations a dealer defined as a public or private enterprise or an individual authorized to collect, transport, recycle, refurbish, dispose, assemble, dismantle, process or store e-waste in environmental sound manner. The implementation of this requirement of the Regulations was next to impossible as the respondents from Vice President office-division of Environment indicated as of January 2022 there were only 16 e-waste dealer countrywide which include; Gamma Metal (T) Ltd, New Tabosh General Company Limited, Chilambo General Trade Company, Steelcom Limited, Graviton Particles Limited, Nyamatagata Small Scale Miners Cooperative Society Limited, Zana Workshop, Makame Ally Makame, Christina Naftal Kigahe, Igakambas Company Limited, Kilimanjaro Cables (T) Limited, Azan Logistics Proactive Waste Management Company Limited, Tindwa Medical And Health Service Limited, J Square Investment Group Co. Ltd and Dream Home Services Limited.

Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020

Section 19 (c) of the Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020 ^[11], requires manufacturers and importers of electronic communication equipment to provide contact details such as address and telephone number of licensed collection centers to consumers so as to facilitate return of used electronic communication equipment. However, there is no any

section in the Regulations mandated the establishment of product take back. Consequently, there is no any penalties assigned to manufacturer or importer who failed to establish a take back center.

The Plant Health Act, 2020

For the implementation of take back schemes, Section 13(i) of the Act, requires the Registrar of Pesticides to establish pesticide empty container collection scheme. Additionally, section 36(2) requires Any person who intends to manufacture, formulate, pack, repack, import, export, store, sell, distribute or transport pesticide, bio-pesticides or offer pesticide application services (i.e. dealer) to indicate in his/her license application compliance to pesticide empty container collection scheme that encourages end users to return containers and unused pesticides to dealers. However, with the interviews with representatives of Tanzania Plant Health and Pesticides Authority (TPHPA), Regional Environmental Experts countrywide and Cities Environmental Management Officers for the 5 cities in the country it was found that there is no take back scheme for the collection of pesticides containers yet established in the country.

Recycling Targets

The Environmental Management (Solid waste management) Regulations, 2009

Section 40(1)(a) of the Environmental Management (Solid Waste Management) Regulations, 2009^[13] require importers and manufacturers of plastic to ensure their product are designed to be environmentally friendly, recyclable, reusable and biodegradable. However, the Regulations does not provide specific requirement on the recycling target. Thus, make it difficult to measure the efficacy of the Regulations in ensuring manufacturers and importers take responsibility by recycling waste emanating from their plastic products.

Information Provision Requirement

Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020

Section 19 (a-c) of the Regulations requires a producer of electronic communication equipment to provide information that will facilitate the implementation of the EPR scheme. These include: (a) information to a recycler on how to dismantle their equipment at the end of life and the location of any hazardous substances or items within the product; (b) create awareness on sound management of e-waste through publications, posters, take back campaign or any other means of communication; and (c) provide contact details such as address, telephone number of licensed collection centers to consumers so as to facilitate return of used electronic communication equipment. However, the practice on the ground depict non-compliance to the requirement of this section. This was attested during the interviews with chairman of the Tanzania Recyclers Association (TARA), Director of Libegreen recyclers, 21 Regional Environmental Experts, and 5 environmental officers from 5 cities in the country.

The Environmental Management (Control and Management of Electrical and Electronic Equipment Waste) Regulations, 2021

Section 52 (1) (e) of this Regulations require manufacturers or importers of the Electric and electronic Equipment (EEE) to provide contact details such as address, telephone numbers or helpline number of authorized collection centres to consumers or bulk consumers so as to facilitate take back of used electrical and electronic equipment. Again, section 52 (2) (c) requires manufacturer or authorized dealers to provide instructions to consumers for handling the electrical and electronic equipment after its use.

Further, the Regulations in section 52(3) provide sanctions for manufacture or dealers who fail to discharge his responsibilities. Under this section A manufacturer or authorized dealer of electrical and electronic equipment who fails to discharge his responsibilities commits an offence and, upon conviction, shall be liable to a fine of not less than five million shillings and not exceeding one billion shillings or imprisonment for a term of not less than seven years or both fine and imprisonment.

However, general observation, interviews with Regional Environmental Management Experts, Officers from National Environmental Management Council and Officers from Vice-President Office-Division of Environment it was found that, there are no manufacturers or dealers of Electronic and Electronic Equipment comply with the requirement of this regulations. Consequently, obsolete electrical and electronic equipment found to pile up in stores of many offices both public and private as well as in workshops of electrical and electronic equipment technicians.

The drawbacks of the existing EPR related Legislation

Lack of clear selected waste category for EPR implementation

The existing legislation inadequately demonstrates the choice of the waste category that Tanzania prioritized for the implementation of Extended Producer Responsibility Schemes. This has impeded a focus and robust approach necessary for achieving maximum benefits that can be accrued through the implementation of EPR schemes. For example, during brand audit survey conducted in Dar es Salaam City between 2018 and 2021 that covered a distance of 6.32km at Salender Bridge, Ocean road, Coco, Kawe, and Ferry-Kigamboni beaches; Mbezi Bus stand-Msigani and Mwembeyanga-Temeke a total of 196,330 pieces of various products mostly packaging materials weighing 13.904 tons in 1,557 bags from several brands were collected. Despite that, the

country lack specific legislation focused on packaging waste. Table 1 shows the amount of packaging waste in the environment from top 10 leading producers on brand audits survey conducted in Dar es Salaam from 2018 to 2021.

Table 1: Summary of the Brand Audit results from 2018 to 2021

S/No.	Year of Survey	2018	2019	2020	2021	Total count (pcs)	Percentage
	Company	Counts (PCs)					
1.	Mohammed Enterprises Tanzania Limited (METL)	1,983	8,277	443	2,717	13,420	31.128
2.	Bakhresa Food Products Ltd	1,903	4,707	201	3216	10,027	23.258
3.	U-Fresh Food Ltd	308	2,430	306	877	3,921	9.095
4.	Chemi and Cortex Ltd	540	2,681	84	1,09	3,414	7.919
5.	Watercom Ltd	1,357	815	23	252	2,417	5.676
6.	Uniliver Ltd	308	1,038	205	715	2,266	5.266
7.	The Coca-cola Company	1,031	382	350	479	2,242	5.200
8.	Tanzania Distillers Ltd	190	318	234	1,263	2,005	4.650
9.	SBC Tanzania Ltd	296	1,216	29	150	1,691	3.922
10.	Tanzania Breweries Ltd	499	599	117	463	1,678	3.892
	Total	10,433	24482	4,012	12,262	43,081	100

Source: Nipe Fagio, 2021

Lack of clear defined institutions for the enforcement EPR schemes

The existing legislation does not provides clear mandate to specific authority for enforcement of the EPR schemes. There are multiplicity of the institutions hosting legislation responsible for the enforcement of EPR schemes in the country. For example, Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020 ^[11] is expected to be enforced by Tanzania Telecommunication Authority while The Environmental Management (Control and Management of Electrical and Electronic Equipment Waste) Regulations, 2021 ^[9] is expected to be enforced by the National Environmental Management Council. Consequently, there is no any meaningful EPR schemes implemented in the country.

Producers inadequately defined

Most of the existing legislation including the Environmental Management Act, Cap 191, and The Environmental Management (Hazardous Waste Control and Management) Regulations (2021) ^[10], do not provide definition of producer at all. On the other hand, the Environmental Management (Control and Management of Electrical and Electronic Equipment Waste), 2021 ^[9] have just define manufacturer and importer. Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020 ^[11] Regulations defines Producer though in the context of electronic communication equipment. The Act defines the producer as any person or entity who introduces or causes to be introduced new or used electronic communication equipment into the market by sale, donation, gifts, and inheritance or by any such related methods.

Lack of forceful definition for producers in the existing legislation affects the attainment of EPR goals. This is due to the fact that substantial number of key producers such as Brand owners, Assemblers, Distributors/Dealers/Agents, Fillers, Converters, Retailers and Online market sellers may be missed in the enforcement of EPR schemes.

Conclusion

This paper critically analyses the Environmental Management Act, Cap 191; The Environmental Management (Control and Management of Electrical and Electronic Equipment Waste) Regulations, 2021 ^[9]; Electronic and Postal Communication (Electronic Communication Equipment Standards and E-waste Management), 2020 ^[11]; The Environmental Management (Solid Waste Management) Regulations, 2009 ^[13] and Environmental Management (Hazardous Waste Control and Management) Regulations, 2021 ^[10] on their adequacy to incentivize producers to adhere to green design or 'eco-design' as well as ensuring effective collection and high rate of reuse and recycling of waste emanating from their products which are the two primary environmental goals of the EPR.

The findings have proven the inadequacy of the existing legislation in achieving the intended goals of the EPR principle. The focus of the existing legislation has been only on product take back and information based instruments while neglecting other EPR policy instruments such as: Advanced Disposal Fees; Deposit Refund Schemes; Recycling investment tax credits; Landfill restriction; and recycling targets.

Additionally, the existing legislation narrowly define the producer and thus, leaving a number of important players responsible for introducing product into the market with no responsibility attached to them for the post-consumer stage of a their product's life cycle. Also, the existing legislation does not define clearly the selected

waste category to be implemented in the country. Consequently, the pollution from waste emanating from producers' products continue to prevail in the environment.

Finally, the multiplicity and fragmentation of the institutions responsible for enforcement of the EPR related legislation has become very evident. Vice-President office-Division of Environment, Tanzania Plant Health and Pesticides Authority (TPHPA) and Tanzania Communication Regulatory Authority (TCRA) through different legislation observed to be custodians of the implementation of EPR schemes. This diluted the focus of enforcement and consequently, producers continues to enjoy the free responsibility for the end-of-life of their product life cycle.

Recommendations

1. The Government through the Ministry responsible for Environment should establish specific EPR Regulations which mainstream all other EPR related sections from other Regulations.
2. The established EPR Regulations should clearly define Producers to ensure no one responsible for introducing the product into the market enjoy the free ride.
3. The established EPR Regulations should clearly define the scope of the Waste category involved in EPR, whereas, packaging and Electrical and Electronic Equipment be part of.
4. The scope of the EPR policy instruments should be widen to include a combination of Administrative, Economic, Regulatory, Performance, and Information based instruments.

The role of the enforcement on EPR should be vested to National Environmental Management Council to avoid inconsistency in ensuring compliance.

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