

# Third International TouMaLi Conference

*TouMaLi 2025: Project Insights and Forward Paths on Sustainable Tourism, Waste Solutions and Litter Prevention*

Hammam Sousse, 26th and 27th of November 2025

**How to think and how to act**



# Extended Producer Responsibility in Egypt According to Law No. 202 of 2020

## A Framework for Sustainable Waste Management and a Circular Economy

### Pilot implementation and Progress in Egypt

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# What is Extended Producer Responsibility (EPR)?

**Extended Producer Responsibility (EPR) is a powerful environmental policy tool that structurally integrates the costs and responsibilities of managing post-consumer waste back to the producers who place the products on the market. It is a fundamental paradigm shift from traditional waste management.**

## Policy Definition

**Holds producers accountable for the entire lifecycle of their products, focusing particularly on final disposal and waste management.**



## Egyptian Formalization

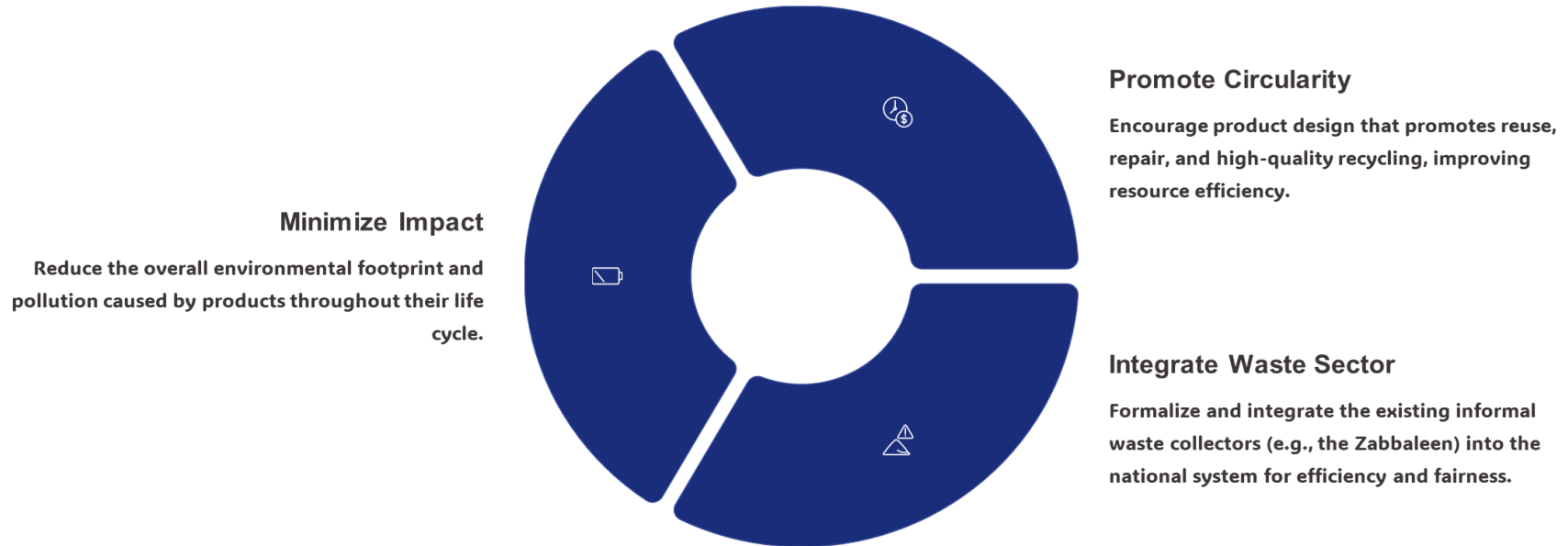
**Egypt's Law No. 202/2020 formalizes EPR to reduce waste volume and significantly promote nationwide recycling infrastructure.**

## Shifting the Burden

**The primary goal is to shift waste management costs from municipal and government budgets directly to the producers.**

# Objectives and Legal Framework of Egypt's EPR Law

Law No. 202/2020 provides the necessary legislative muscle to transition Egypt towards a more circular and resource-efficient economy. The objectives are multifaceted, addressing both environmental and socio-economic dimensions.



The Law strictly mandates producers to manage post-consumer waste and establishes clear administrative penalties and financial fines for non-compliance, creating a strong regulatory incentive for adherence.

# Producer Obligations Under Egyptian EPR Law

Producers must undertake specific responsibilities to meet the mandates of Law No. 202/2020. These obligations range from initial reporting to financing the entire waste management chain.

## → Registration and Reporting

Producers must register all relevant products and report comprehensive data on the quantity and type of waste generated from their products on a regular, mandated basis.

## → Eco-Design Mandates

Producers are incentivized or mandated to implement "Eco-Design" principles—modifying products to be more durable, repairable, and easier to recycle, minimizing environmental harm.

## → Financial and Logistical Responsibility

They are required to either finance the collection, recycling, and disposal costs or organize these operations themselves, ensuring targets are met.

## → Cooperation with PROs

Active cooperation with Producer Responsibility Organizations (PROs) and governmental bodies is necessary to streamline compliance and achieve national recycling goals efficiently.

📄 These obligations fundamentally change how businesses interact with the end-of-life stage of their products, fostering innovation in material use.

# Global Benchmarks: EPR in world

To optimize Egypt's emerging EPR system, it is vital to analyze established, successful models like those.

Country	Main Implementing Authorities	Application Method / Mechanism
DE Germany	Central Packaging Register (ZSVR) under the Federal Environment Agency (UBA); oversight by state authorities.	Mandatory producer registration; compliance through licensed Producer Responsibility Organizations (PROs); producers finance collection and recycling directly.
GB United Kingdom	Department for Environment, Food & Rural Affairs (DEFRA) and Environment Agency; local councils execute collection.	Producers report packaging data and pay EPR fees to fund local authority collection; implementation through approved Compliance Schemes (PROs).
FR France	ADEME (Environmental Agency) oversees multiple eco-organizations (PROs) approved by the government.	Producers join approved PROs and pay eco-contributions; PROs handle collection, recycling, and awareness campaigns.
JP Japan	Ministry of Environment (MOE) and Japan Containers and Packaging Recycling Association (JCPRA).	Producers pay recycling fees to JCPRA; municipalities collect sorted waste and deliver it to designated recyclers.
CN China	Ministry of Ecology and Environment (MEE) and local Environmental Bureaus.	Producers/importers responsible for take-back systems; recycling companies licensed by local authorities; mixed government-private model.
CA Canada	Provincial Environment Ministries (e.g., British Columbia's EPR program managed by Recycle BC).	Producers manage the full system (collection to recycling); compliance monitored provincially, not federally.



# Key Differences in EPR Application: A Comparison



Legal Start	Law No. 202/2020	Packaging Act 1991 (Pioneering)	Packaging Regulations 2023
Producer Registration	Mandatory, system developing	Mandatory via LUCID Register	Mandatory for large producers
Fee Structure	Under development, cost-based	Fees via dual system (PROs)	Fees modulated by product recyclability
Waste Collection	Formal + informal integration	Formal systems, robust PROs	Local authorities funded by PackUK
Enforcement	Developing regulatory enforcement	Strong enforcement & high fines	Enforcement led by DEFRA

# List of materials for the first stage

Polyethylene Terephthalate	A type of transparent, lightweight plastic used to make water and juice bottles, known as number (1) within the recycling triangle.
High-Density Polyethylene	A type of strong, impact- and chemical-resistant plastic, often marked with the number (2) inside a recycling triangle. Its main uses include: Detergent and oil containers Water and drainage pipes Thick plastic bags Bottle caps
Polystyrene, Polypropylene	PS/A type of rigid, lightweight plastic, marked with the number (6) inside a recycling triangle. Its most common uses include: Ready-made food containers and foam packaging (like burger boxes or white cups). Plastic cutlery (forks, knives, and spoons). Thermal and acoustic insulation materials. PP/A type of strong, lightweight, and heat-resistant plastic, marked with the number (5) inside a recycling triangle. Its most common uses include: Microwaveable food containers. Bottle and container lids. Non-woven fabrics (like face masks and wet wipes). Plastic parts in cars and household appliances.



# List of materials for the first stage

Low-Density Polyethylene	<p>A flexible, soft plastic sheet with the number (4) inside a recycling triangle. Its most common uses include:</p> <ul style="list-style-type: none"><li>Supermarket and grocery bags.</li><li>Plastic wrapping film.</li><li>Containers for some types of shampoo and liquid detergents.</li><li>The inner lining of lined cardboard boxes (like juice or milk cartons).</li></ul>
glasses	<p>These are glass containers used for packaging and storing various products (such as food, beverages, and medicines). Clear glass:</p> <ul style="list-style-type: none"><li>Used for displaying products whose appearance is important, such as juices and honey.</li></ul> <p>Amber glass:</p> <ul style="list-style-type: none"><li>Protects the contents from light; ideal for medicines and essential oils.</li></ul> <p>Green glass:</p> <ul style="list-style-type: none"><li>Often used for beverage bottles (such as soft drinks and beer).</li></ul>
Paperboard / Cardboard Packaging	<p>Plain cardboard (folding cartons):</p> <ul style="list-style-type: none"><li>Such as boxes for pasta, powders, medicine, tea, etc.</li></ul> <p>Corrugated board:</p> <ul style="list-style-type: none"><li>Such as boxes used for shipping and outer packaging.</li></ul>
Multilayer Packaging	<p>Tetra Pak packaging consists of multiple layers of different materials (such as plastic, aluminum, and cardboard) to combine the advantages of each material in one container.</p> <p>Common uses:</p> <ul style="list-style-type: none"><li>Juices and dairy products (Tetra Pak).</li><li>Sauces and tomato paste.</li><li>Ready-made meals and snacks.</li><li>Chocolate and coffee wrappers.</li></ul>

# The Success Story of the TouMaLi Project in Alexandria: Leading the Implementation of Extended Producer Responsibility in the Tourism Sector

**One of the pioneering projects carried out in cooperation between the Waste Management Regulatory Authority, the Arab Academy for Technology and Maritime Transport, Rostec University in Germany, and Black forest Company, with the aim of implementing a pilot project to apply extended producer responsibility, especially in the tourism sector.**



## **Establishment of a Producer Responsibility Organization (PRO) Model**

**The project successfully launched a pilot model for a Producer Responsibility Organization (PRO) specifically for the tourism sector, laying a solid foundation for efficiently financing and managing plastic packaging waste.**



## **Implementation of an integrated registration system**

**In cooperation with Land bell Company, a model for an integrated registration system was implemented with the aim of enabling producers to record all data related to the quantity of products placed on the market and to track the collection and recycling of this waste.**

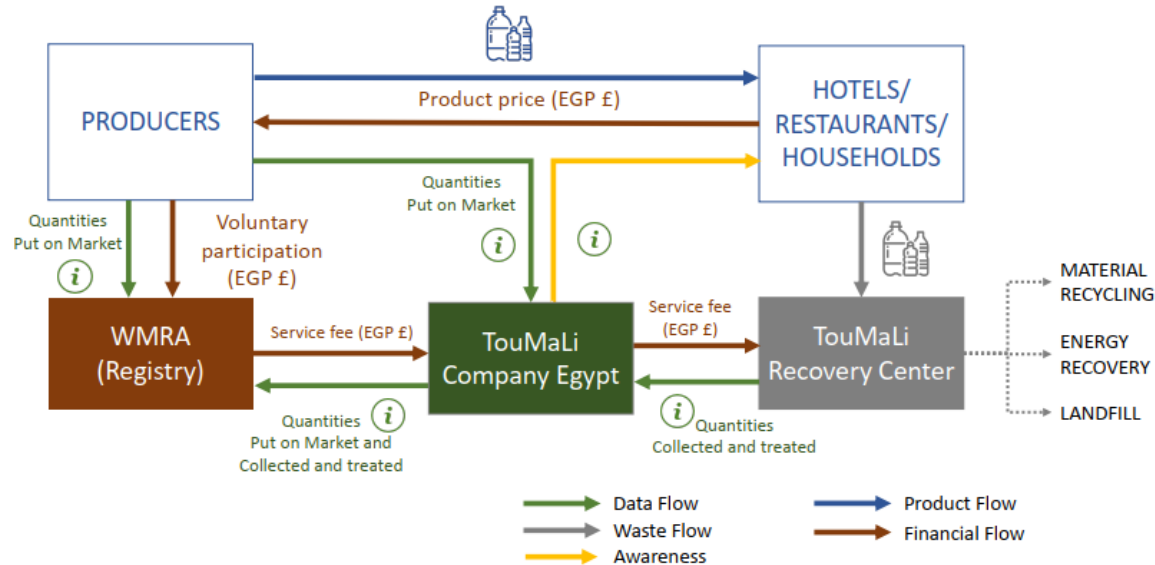


## **Know exactly what we need**

**This gathering of experts from around the world, including academic experts, and through discussions with local producers and recycling companies, in cooperation with the Waste Management Regulatory Authority, was able to draw a comprehensive picture by studying various international experiences and in accordance with the current status of the waste management system in Egypt. This helped us assess our needs and have a mental picture of how we will proceed in the future.**

# WP III: Development of EPR concept for the benefit of tourism sector at national level

- TouMaLi-Egypt get the approval from WMRA to implement the suggested EPR concept in the region of Alexandria as a pilot project



# EPR Pilot Alexandria

## TouMaLi EPR Workshops with WMRA – Jan & Feb 2025

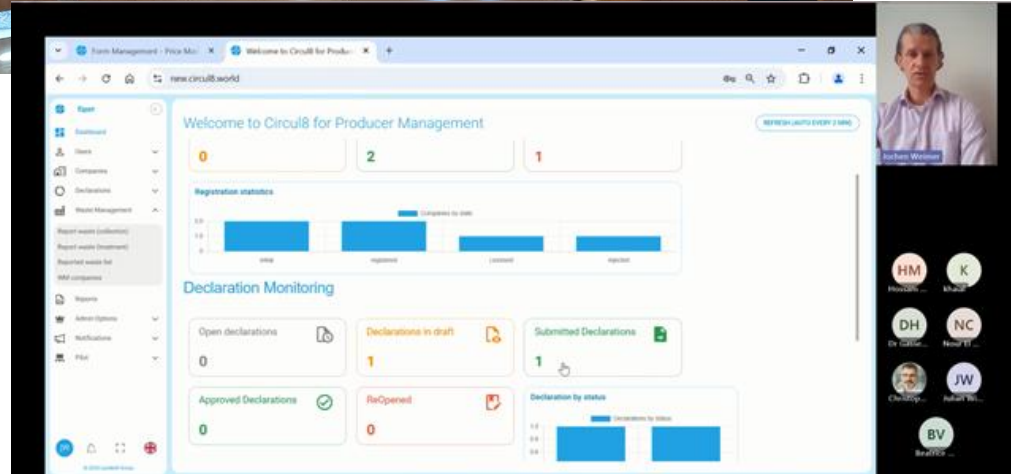
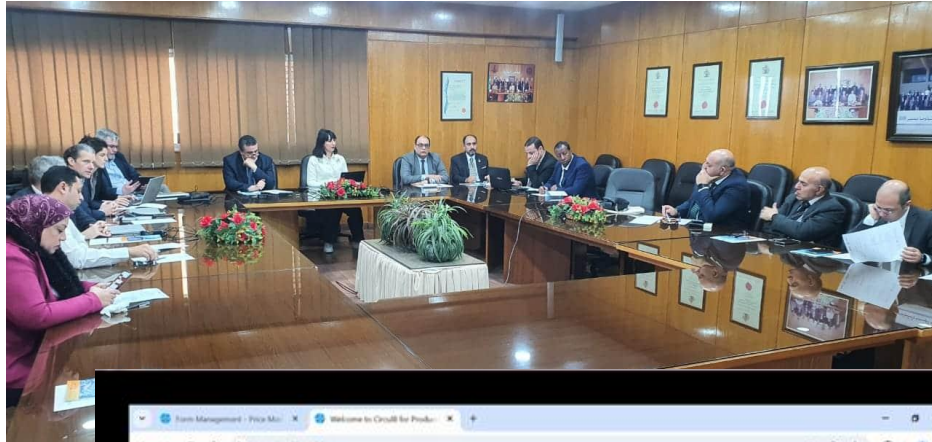
The workshop was held at the AASTMT main campus for the 2 days.

Attendee;

WMRA, Ministry of environment, Ministry of Tourism, Alexandria governate, Nahdet Misr

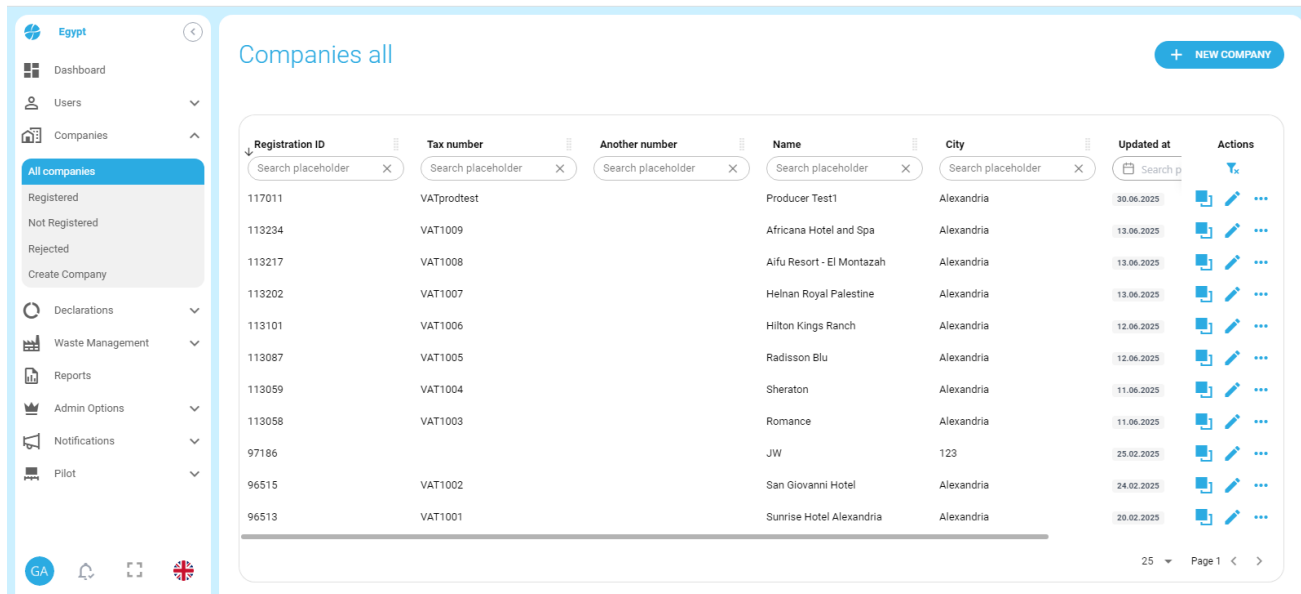
TouMaLi Team: Landbell, Blackforst, University of Rostock, Arab Academy

- Implementing the EPR pilot system for the Tourism sector in Alexandria is discussed.
- Circul 8 system for registration and declaration is presented by Landbell team
- Online training is provided by Landbell team to WMRA, Arab Academy, and Nahdet Misr teams, ensuring effective use of the customized Circul8 platform in line with Egypt's EPR framework.



# EPR Pilot Alexandria – status - and Data collection from Hotels

- Arab Academy is the local partner for TouMaLi project entered the data for about 9 hotels (producers) as materials added to the market.



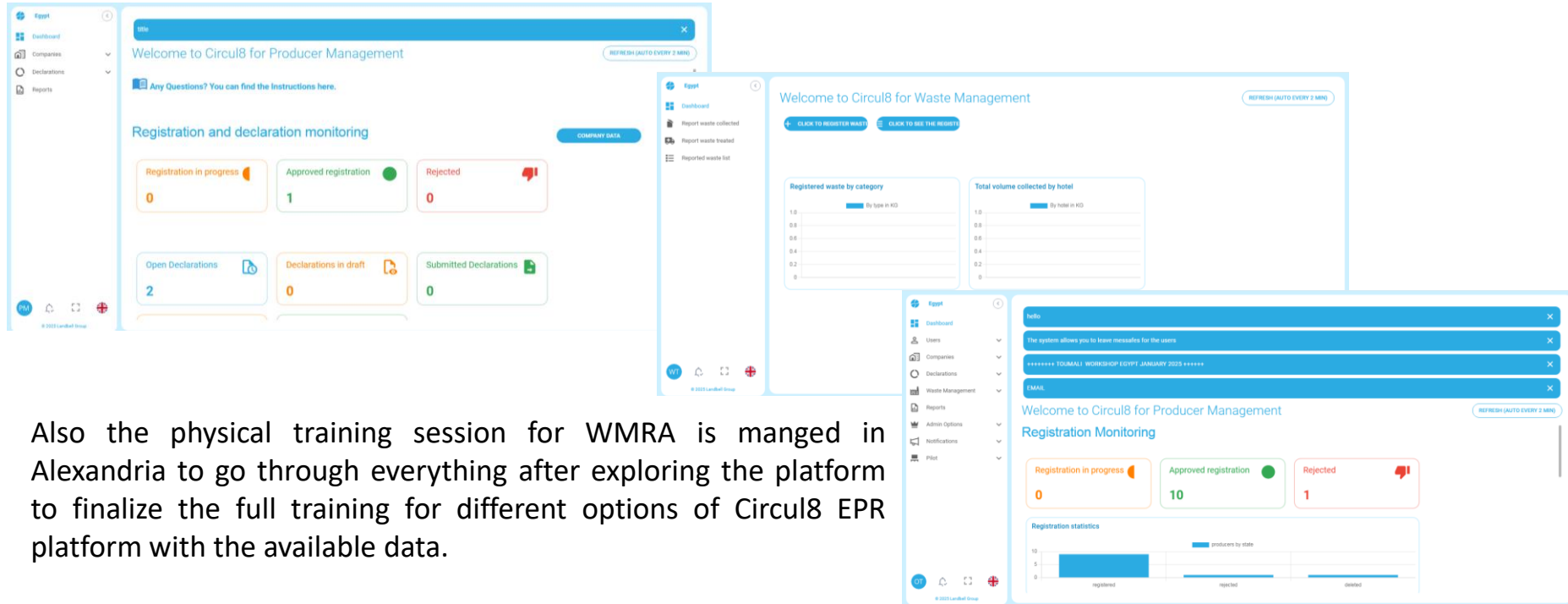
Registration ID	Tax number	Another number	Name	City	Updated at	Actions
117011	VATprodtest		Producer Test1	Alexandria	30.06.2025	
113234	VAT1009		Africana Hotel and Spa	Alexandria	13.06.2025	
113217	VAT1008		Aifu Resort - El Montazah	Alexandria	13.06.2025	
113202	VAT1007		Helnan Royal Palestine	Alexandria	13.06.2025	
113101	VAT1006		Hilton Kings Ranch	Alexandria	12.06.2025	
113087	VAT1005		Radisson Blu	Alexandria	12.06.2025	
113059	VAT1004		Sheraton	Alexandria	11.06.2025	
113058	VAT1003		Romance	Alexandria	11.06.2025	
97186			JW	123	25.02.2025	
96515	VAT1002		San Giovanni Hotel	Alexandria	24.02.2025	
96513	VAT1001		Sunrise Hotel Alexandria	Alexandria	20.02.2025	

- WMRA is informed that the data of the package material are entered to the platform and they can use the Egyptian portal for Circul8 to explore the platform with the filled data.



# EPR Pilot Alexandria – status – and Data collection from Hotels

- Three accounts are created for WMRA to act as **Producer, Waste Management Company and Operations Manger** to fully explore, monitor, control and test all the situations and options for the Circul8 Platform customized for TouMaLi EPR pilot in Alexandria.



Also the physical training session for WMRA is manged in Alexandria to go through everything after exploring the platform to finalize the full training for different options of Circul8 EPR platform with the available data.

# Implementation Timeline for EPR in Egypt

## Phase 1: Consultation with stakeholders

**September 2024 - March 2026**

Completion of consultation and identification of obstacles to implement the Extended Producer Responsibility system  
Drafting a decision for the Prime Minister Implementing awareness initiatives  
Completion of preparing value chain studies and defining roles

## Phase 3: stage 1(Transition Phase)

**April 2026 - October 2026**

6 months grace period  
Starting product registration and record keeping  
Contracting with the Extended Producer Responsibility company

## Phase 5: stage three

**January 2027**

Applying the collection, treatment, and recycling sector  
Evaluation and improvement  
Innovation and development

## Phase 2: Issuance of Prime Minister's Decision

**April 2026**

Defining responsibilities and obligations  
Initiating mandatory product registration

## Phase 4: stage Two

**November 2026**

Beginning payment of the Extended Producer Responsibility fee on regulated products  
Starting periodic electronic reporting  
Defining targets and submitting periodic reports for all materials

Supported by:



based on a decision of the German Bundestag

# Conclusion: Towards a Sustainable Waste Future in Egypt



Egypt's EPR Law No. 202/2020 marks a critical and ambitious commitment to environmental sustainability, aligning the nation with global best practices in waste management.



## Legislative Success

The law provides a strong legal foundation necessary for transforming Egypt's waste management system from a linear model to a circular one.



## Global Learning

Accelerated success can be achieved by carefully adopting lessons learned from mature systems in Germany and the UK, adapting them to the local context.



## Crucial Collaboration

The implementation relies heavily on genuine, collaborative partnerships between the government, proactive producers, and the essential informal collection sector.



## Long-Term Impact

Timely and effective implementation is projected to significantly reduce waste, boost national recycling capacity, and protect Egypt's environment for coming generations.