



RWANDA FDA

Rwanda Food and Drugs Authority

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Kigali on, 28/09/2020

Ref. N°: DIS/2130/FDA/2020

Manufacturers of alcoholic drinks
Distributors of alcoholic drinks
Retailers (All)
General public

Dear Sir/Madam

Re: Circular on prohibition of packaging alcoholic drinks in plastic bottles.

Reference is made to the law N°: 003/2018 of 09/02/2018 establishing the Rwanda Food and Drugs Authority (Rwanda FDA) mainly in its article 8, Paragraph 2 and 13,

Further reference is made to the previous inspections conducted by Rwanda FDA in different places and the findings where alcoholic drinks were being packaged, distributed and sold in plastic bottles.

Rationale

Food packaging is designed to contain, protect, prevent contamination, transport and store products. Moreover, packaging extends shelf life and maintains the quality and safety of goods. Therefore, such use is not intended to have any technical effect in food that may cause health hazard to consumers.

European regulation N° 1935/2004 underlines that: “Any material or article intended to come into contact directly or indirectly with food must be sufficiently inert to preclude substances from being transferred to food in quantities large enough to endanger human health or to bring about an unacceptable change in the composition of the food or deterioration in its organoleptic properties”

Packaging alcoholic drinks in plastic bottles leads to adulteration (loss of quality) of drinks particularly reduced shelf-life.

Some plastic bottles are made of chemicals such as Bisphenol-A (BPA) which, in presence of alcohol, can be dissolved into the drinks especially at the increase of storage temperature.

Other plastic bottles made of polyethylene terephthalate (PET) contain a potentially carcinogenic element called diethyl hydroxylamine (DEHA) that can be re-activated by environmental factors like prolonged exposure to heat and contact with alcohols.

In order to ensure quality and safety of alcoholic drinks on Rwandan market. The authority is therefore pleased to recommend the following:

1. MANUFACTURERS OF ALCOHOLIC DRINKS

- To use glass bottles or any other appropriate packages while packaging all alcoholic drinks including banana-based, plant-flavoured (Ex: ginger) and wines

2. DISTRIBUTORS OF ALCOHOLIC DRINKS

- To stop receiving and distributing alcoholic drinks packaged in plastic bottles and to report manufacturers who use plastic bottles.

3. RETAILERS OF ALCOHOLIC DRINKS AND SHOP OWNERS

- To stop receiving and selling alcoholic drinks packaged in plastic bottles and to report manufacturers who use plastic bottles.

4. CONSUMERS

- To stop buying and drinking alcoholic drinks packaged in plastic bottles and to report sellers and manufacturers who use plastic bottles.

Note: For more information or to report manufacturing and/or sellers of the above-mentioned products please call **0789 19 35 29**

Thank you for your cooperation

Dr. Charles KARANGWA
Ag. Director General

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Rwanda Food and Drugs Authority

References:

1. Cristina Bach, Xavier Dauchy, Marie-Christine Chagnon, Serge Etienne. Chemical migration in drinking water stored in polyethylene terephthalate (PET) bottles: a source of controversy. *Water Research*, IWA Publishing, 2012, 46 (3), pp. 571-583. [ff10.1016/j.watres.2011.11.062ff. fhal-00683918f](https://hal.archives-ouvertes.fr/hal-00683918). Available on <https://hal.archives-ouvertes.fr/hal-00683918/document>
2. Natural Resources Defense Council, 2008. *Chemicals in Plastic Bottles*. Available on <https://www.nrdc.org/sites/default/files/bpa.pdf>
3. Piselli A, et al (2014). Natural-based coatings for food paper packaging, *International Journal of Design Sciences and Technology*, volume 20:1, pp 55-78
4. RSB announcement on packaging bottles for Gin manufacturing, 2014. Available on https://rsb.gov.rw/index.php?id=34&tx_news_pi1%5Bnews%5D=141&tx_news_pi1%5Bcontroller%5D=News&tx_news_pi1%5Baction%5D=detail&cHash=6efaaca853b1fb5efc44769027c75dfe



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