

2nd April 2009

Declaration and Recommendation by the NGO Coalition against Alcohol abuse In Uganda.

Meeting held at Ibamba Restaurant, Kira Road Kampala Uganda.

Preamble

Given the evidence that alcohol consumption represents a current and future threat to public health in Uganda, and the need to promote alcohol policy measures that are evidence based, a meeting to review the final draft National Alcohol Policy was held at Ibamba Restaurant on 2nd April 2009. The meeting was attended by over 20 NGO leaders, alcohol policy experts, public health practitioners, representatives of the recovering community, and the media. There is increasing evidence linking alcohol consumption to health and social problems, including high risk sexual behaviour resulting in HIV infection, domestic violence, crime, workplace problems, and child abuse.

The meeting also noted that the alcohol industry had targeted young people consequently reducing their productivity, absenteeism, unemployment and poverty. Alcohol also seriously harms women. The benefits argued by the industry come at enormous cost and alcohol is an obstacle to development in Uganda. The impact on employment is often low and sometimes negative due to automation, replacement of cottage industry and consequently undermining family income

The coalition members having reviewed the draft **NAP totally reject it and refuse to identify** with whole document. The document doesn't meet the interests of the Ugandan citizens; it compromises public health principles and ignores the good practices that have been found effective in regulating alcohol in other countries. The present NAP is full of industry words, concepts and terminology which makes it a weak document difficult to enforce and save our young generation from alcohol. The NAP draft is designed from an industry stakeholder point of view.

Aware that the World Health Organization has recommended that countries need to consult but not to collaborate with economic operators in the alcohol market chain, we recommend that the government consults with the economic operators but not allow them to influence the process of policy development in ways that compromise the public health as it has been the case before. Stakeholders with significant financial conflicts of interest should declare these conflicts where appropriate and should not be involved in planning, development, or implementation of policies with a public health focus and impact, because of their inherent conflicts of interest and their lack of expertise in the area of public health.

With reference to the WHA resolution when developing the global alcohol strategy the alcohol industry and other economic alcohol stakeholders should be involved only at consulting level not cooperation or collaboration or creative partnerships. The alcohol industry has an agenda that is diametrically opposite to public health objectives!!!

The coalition members therefore recommend;

1. A re-constitution of the drafting committee with wider consultations with stakeholders.
2. Only consult the alcohol industry but don't form partnership (funding, drafting and facilitation).
3. We inform other key stakeholders about this hidden agenda including MPs, FBOs and NGOs, CSOs and other government departments.

As NGOs, the following measures/good practices should be an integral part in the new NAP to be developed and implemented expeditiously in order to build a comprehensive system of legal regulatory,

educational and treatment measures to deal with alcohol -related problems from a public health perspective.

1. **Availability of alcohol:** The government needs to recognize that reducing the number and density of outlets, locations, days and hours of opening can all reduce the harm done by alcohol. It is recommended that licensing production be strengthened to serve the public health aims of discouraging frequent and excessive alcohol production and consumption.
2. **Advertisement, promotion and sponsorship:** We recognize that industry self-regulation of alcohol marketing is an ineffective mechanism to protect vulnerable populations and reduce harm done by alcohol. We recommend banning all forms of alcohol advertising, promotion and sponsorship that promote alcoholic products by any means that are false, misleading or deceptive or likely to create erroneous impression about its characteristics, health effects or hazards be prohibited.

In addition:

- Appropriate health warnings or messages should accompany all alcohol marketing and advertising.
 - The use of direct or indirect incentives that encourage the purchase of alcohol products, such as sales promotions, should be prohibited.
 - Distribution of free alcohol promotion products (e.g., T-shirts, glasses, cups, etc.) should be prohibited to minors.
3. **Sales to minors:** Recognizing that alcohol consumption, the harm done by alcohol and binge drinking amongst young people is increasing at an alarming rate in Uganda, we recommend strict enforcement of laws restricting the sale of alcohol to minors under the age set by the law and the industry be held responsible. Recognizing that the delay of access to alcohol has positive benefits to young adults, especially in relation to accidents, injuries, and fetal alcohol spectrum disorders, the age of legal alcohol purchase should be set at 21. There should be frequent compliance checks to enforce this policy and those retailers found to be selling alcohol to minors should receive appropriate sanctions.
 4. **Price and taxes:** The coalition members recognize that price and tax measures that increase the relative cost of alcoholic beverages are highly cost effective in reducing the harm caused by alcohol to young people and heavy drinkers. NGOs recommend that appropriate higher taxes on alcohol products be introduced. Such measures should be proportionate to the alcohol content of the beverage, and should be adjusted periodically to compensate for the effects of inflation. Given the growing capability to accurately estimate the economic costs of alcohol to society, consideration should be given to the use of dedicated alcohol taxes to fund prevention, treatment, and law enforcement programs as well as policy implementation.
 5. **Law Enforcement:** The coalition members recognize that enforcement of Enguli Act- alcohol laws is very weak in Uganda. We recommend a review and a reform of the current law.
 6. **Illicit trade in alcoholic products:** The coalition recommends that the government ensures total elimination of all forms of illicit trade in alcoholic products including smuggling, illicit manufacturing and counterfeiting, and take legislative and administrative measures to ensure that all unit packages of alcoholic products and any outside packaging are marked to assist identification of the origin and alcohol content, in order to monitor the movement of alcoholic products. There is a

pressing need for a comprehensive study of alcohol production and distribution within the informal sector, and for solutions that respect the role of traditional beverages in Uganda and the need to provide alternative sources of income to those engaged in illicit production.

7. **Reduction in drink driving and Education, communication, training and public awareness:** Effective education communication and training initiatives should be implemented to raise awareness, taking into account the need to strengthen public support for effective alcohol policies.
8. **Packaging and labeling of alcoholic products:** Clear and prominent warning signs should be placed at every point of sale. In addition, economic operators would not design their products in a way that appeals to young people, women and other vulnerable population groups (e.g., small alcohol-containing sachet's that can be concealed by young people).
9. **Counseling, Treatment and Rehabilitation:** NGOs recommend that these programs be expanded to meet the need and the demand for early intervention and treatment services in areas of heavy alcohol consumption. To the extent that the most cost-effective interventions are mutual help organizations (such as Alcoholics Anonymous) for recovering alcoholics and brief interventions for hazardous drinkers.

10. Development of the Alcohol policy bring on board all other stakeholders

We encourage the government to bring on board all other stakeholders (e.g. social welfare, judiciary, finance, enforcement agencies, UNBS, URA, government chemist, FBOs, NGOs, etc.) in order to have a comprehensive multi sectoral alcohol policy, and consult with industry as well as industry-sponsored trade and social aspect organizations to identify ways that industry can improve its production, packaging, product design, product safety and marketing practices in ways consistent with the public health objectives of national alcohol policies. Economic operators should also recognize that in many countries the majority of the population practices alcohol abstinence and for this reason all marketing activities should be respectful of social customs and religious beliefs.

WHO and other public interest international organizations should provide technical support to countries interested in improving their national alcohol policies. Resources should be provided to develop appropriate policy documents, including model legislation, which can be used by countries.

Given the increasing level of harm caused by alcohol in Uganda, NGOs urge government to treat as urgent the development and full implementation of evidence-based alcohol policies.

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