

Inter-Religious Council of Uganda



Religions for Peace

GENERAL MEMORANDUM OF PARLIAMENT OF UGANDA ON THE ALCOHOLIC DRINKS CONTROL BILL, 2023 AND AN SYNOPSIS OF THE NEGATIVE EFFECTS OF ALCOHOL IN UGANDA.

1.0 Salutations

Praise God from whom all blessings flow.

We bring you warm greetings from the Inter-Religious Council of Uganda.

We are honoured for every opportunity to engage with Parliament of Uganda on matters that impact on the people we lead, matters of religious freedom and values as a country.

Its in this spirit that we extend our gratitude to the Chairpersons of the Parliamentary Committees on Health, and Tourism, trade, and industry specifically for giving the IRCU an opportunity an appointment to present our thoughts on the Alcoholic Drinks Bill, 2023.

1.1 Introduction

The Inter-Religious Council of Uganda is mindful of the International, Regional and Domestic Regulations stipulating on Alcohol, specifically those that seek to control the usage of Alcohol.

The recommendations of the Inter-Religious Council of Uganda are informed by the different opinions of IRCU member bodies, gathered from the different regional consultations by the IRCU in the Rwenzori, Toro, Ankole, Teso, Bugisu, Busoga and Buganda sub regions between 2022 and 2023. In these consultations all the participants were concerned with the need for regulation of alcoholic and narcotic consumptions. They did request the IRCU to take up this matter as a

matter of national importance and for high level advocacy hence this opinion.

The IRCU has been able to review the Alcoholic Drinks Bill, 2023 and made recommendations clause by clause to the Bill. The IRCU has also proposed additional recommendations to areas not specifically covered in the Bill, which in the opinion of the Council should be captured in the Bill.

The IRCU has made specific reference to the following instruments

1. World Health Organization Global Strategy to Reduce Harmful Use of Alcohol.

The WHO through this strategy provides guidance to member states on evidence-based interventions to reduce alcohol-related harm.

2. United Nations Sustainable Development Goals (SDGs) on Alcohol

The United Nations Sustainable Development Goals (SDGs) includes targets related to alcohol control, good health, and well-Being under Goal 3. Additionally, Target 3.5 specifically aims to strengthen the prevention and treatment of substance abuse, including alcohol abuse. This target highlights the importance of implementing policies focused on reducing the harmful use of alcohol and ultimately promote public health.

3. World Health Organization African Chapter

The WHO African Chapter recognizes the need for the reduction of public health problems caused by the harmful use of alcohol and the required interventions required by government to control alcohol related harm to populations.

The regional strategy objectives include to provide guidance to Member States for the development and implementation of effective alcohol control policies based on public health interests, *To address low awareness on alcohol related harm in*

the community, To promote the provision of adequate health-care interventions for preventing harmful use of alcohol and managing the attendant ill-health and conditions and to encourage the creation of systems of systematic surveillance and monitoring of alcohol production, consumption and harm in countries.

2.1 The Challenge of Alcoholism in Uganda

As of now Uganda ranks high in global consumption of alcohol as per the WHO global status report on alcohol and health 2018. In Uganda Alcohol Report 2022 published by Uganda Alcohol Policy Alliance shows that beers account for 11% of alcohol consumed in the country, spirits 3%, wines 3% and illicit brews 89%

Uganda places fifth globally and the First in Africa in Alcohol consumption. The statistics show the drinkers of alcohol in Uganda amount to 75%, with the heaviest drinkers being young adults of 18-35 years with the male taking up 50%, females 25% with the Total annual consumption being 12.21 litres, Men consume 19.93 litres, while women consume 4.88 litres.

Recent findings show 7.1 % of alcohol consumers, that is around 3.2 million people in Uganda struggle with alcohol use disorders as per Mr. Muhumuza Brian an addiction counsellor at Safe Places Uganda and he further says chronic consumption of alcohol damages the liver, leading to dementia, liver cirrhosis, and kidney¹

As a result, Alcohol addiction poses numerous challenges in Uganda and Sub-Saharan Africa which include increased risk of injuries, violence, mental health disorders, and non-communicable diseases. The Limited access to treatment services and stigma surrounding addiction further exacerbate the problem in these regions. Expenses to alcohol addiction, such as healthcare expenses among others.

3.1 General Observations of the IRCU regarding the Bill.

The IRCU is therefore not opposed to the Bill and believes that once its recommendations are mainstreamed, the Bill will go a long way in

¹ Patrick Ssentongo, Uganda Places Fifth on Alcohol drinking Index, Daily Monitor, August 19 2023.

dealing with challenges associated to alcoholism. The IRCU made the following observations;

1. In respect to the penalties proposed in the Bill, the Penalties seem to be more punitive than corrective in nature especially in respect to the term of imprisonment and fines proposed. The IRCU recommends the introduction of corrective and reformatory measures to allow for reformation, rehabilitation, retribution, deterrence, and restitution.
2. The IRCU opines that Government should address challenges associated with alcoholism as a moral issue than a legal issue. Therefore, Parliament should provide for mandatory awareness, rehabilitation, and social economic empowerment programs to reduce alcoholic consumption and abuse.
3. The IRCU observes that the reasons for the high consumption of alcohol in Uganda include; the impact of the high cost of living, unemployment, peer pressure, poverty, illiteracy, and negative cultural practices. The IRCU recommends mainstreaming of these challenges within the planning cycle of government for redress.
4. The IRCU observes that while the Bill does not seek to apply to the manufacture of native liquor for domestic use, local or traditional ceremonies. The IRCU observes that it is in this area of production where so many people easily have access to alcoholic drinks. The IRCU has recommended the need for local/domestic brewers or producers to comply with set standards for production.
5. The IRCU the has further noted the need for a Rehabilitation Fund, this is because mostly the issue of rehabilitation of victims of alcoholism and families affected by alcoholism is left to religious, cultural and CSOs, without intentional contributions from Government and companies involved in alcoholic beverage manufacturing.

6. Economic and social impacts of alcohol consumption; In drafting and debating of the Bill, Parliament should take cognizance of the economic and social impacts of Alcohol in the society as a whole. The Inter-Religious Council of Uganda took cognizance of the growing numbers of accidents in Uganda with a bearing on drunk driving, the increased cases of domestic violence arising from alcoholic consumption by spouses, the alarming rates of school dropouts, addictions among young people, high rates of mental disorders and abdication of parental responsibility among others.

Non-regulation of usage of alcohol can lead to an increase in health problems such as liver disease, addiction, mental health disorders, and fetal alcohol syndrome.

Furthermore, alcohol abuse can lead to social issues like domestic violence, crime, unemployment, poverty, and family breakdowns, public disturbances among others

Alcohol abuse places a significant economic burden on healthcare systems, law enforcement agencies, and social services through the costs incurred.

4.1 A Summary of the recommendations of the Inter-Religious Council of Uganda regarding the Alcoholic Drinks Bill, 2023

The Inter-Religious Council of Uganda while at a consultative meeting with the Movers and Seconders of the Bill, at Parliament of Uganda in 2023 made the following recommendations regarding the Alcoholic Drinks Bill, 2023.

- **Restrictions on Alcoholic Persuasive advertisements;** the IRCU noted with concern the different advertisements regarding alcoholic drinks on different media outlets. The IRCU advised that just like it was with the Tobacco Control Act, it is important for Government through this Bill to restrict or ban alcoholic drinks

persuasive advertisements in both print and audio-visual media. This will deter young people from being attracted to alcoholism.

- **Ban of Sale of Alcoholic drinks packaged in polythene;** The IRCU noted that the continued packaging of alcoholic drinks in small polythene bags, has made it easy for children and the youth, to easily access alcohol. The IRCU therefore recommended a ban on the sale of alcoholic in polythene packages. The Bill should specifically capture this.
- **Establishment of a rehabilitation Fund;** all manufacturers and distributors of alcoholic drinks should mandatorily contribute to this Fund. The IRCU noted that the State and private entities have incurred the burden of rehabilitation of those affected by alcoholism without a direct contribution of manufacturers and distributors of alcohol. The IRCU requested for a special fund for rehabilitation, where dealers in alcohol can make contributions to the Fund. The should be managed by the Ministry of Health for purposes of rehabilitation of persons affected by alcohol. Voluntary contributions to the fund should be encouraged.
- **Regulation of Alcohol by two-line Ministries;** the IRCU recommended that in the interpretation clause and the clauses which vest powers to a minister to regulate the manufacture, distribution, and sale of alcohol. This responsibility should be vested in two Ministries; that is the Minister of Health, since alcoholic consumption and its effects present more health issues than the business element. The Minister of Trade, Cooperatives and Industry should be concerned with issues of licensing, Distribution, and manufacture.
- **Regulate the time for sale of alcohol;** the IRCU was alarmed by the fact that those who consume alcohol especially in the rural areas, decide to do so even in the morning hours during the hours of productivity. The IRCU recommends that just like in Kenya and other countries. The time for consumption of alcohol should be earmarked and enforced for example during working

hours the IRCU recommended 5:00 pm to 12:00 Midnight. A different timeline for weekends and public holidays should also be identified. This will improve on productivity and strength family ties.

- **Restriction of sale of alcoholic in all manner of vehicles;** the bill under Section 19; restricts the sell and consumption of alcohol in passenger vehicles; however, the IRCU is of the opinion that alcoholic sale and drinking should be restricted to both cargo and private vehicles.

There is need to license vehicles for the purpose of distributing, transporting and saling of Alcohol. This will deal with the challenges of drink driving, reduce road accidents and enable identification of vehicles licensed for distribution, transportation, or sale.

- **Strict Penalties to sale of alcoholic to certain persons;** the IRCU noted that Section 20 of the Bill restricts the sale of alcohol to law enforcement officers in uniform. However, the Council is of the opinion that alcohol sale should be restricted to non-uniformed officers, armed personnel, pregnant women, civil servants, already intoxicated persons, and children below 21 years. There's need to penalize the buyers too. There may be need to require any form of identification before sale of alcohol to a person.
- **Revise the sale guidelines to persons who are 21 years and above;** the IRCU is of the opinion that selling alcohol to persons ranging from 18 years, is not in morally in order. The proposed age for access to alcohol should be 21 years. This will cater for those still in High school and also align with the age specified in the alcohol policy.
- **License for alcoholic production;** the IRCU noted the need to regulate and restrict the production of alcohol to only those with State Licenses and those who meet the State standards which

should be set by UNBS. This is because the IRCU noted the sale of adulterated alcoholic drinks in some regions which resulted into the death of those who consumed the same.

To implement this provision, the Government will have to provide a buffer time within which persons who are already in the business of alcoholic drinks and beverages can acquire licenses.

Conclusion

Governments have the primary responsibility for regulating alcohol use within their borders through boarder control, taxation through revenue authorities. This includes enacting laws and policies to govern aspects such as the legal drinking age, hours of sale, licensing requirements for alcohol vendors, and penalties for alcohol-related offenses.

The IRCU pledges to support all avenues by Government to regulate the usage of alcoholic drinks.

I thank you all.

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CO-Chair IRCU Council of Presidents/Presiding Apostle-Born Again Faith

Chairperson- IRCU Alcoholic Drinks Sub- Committee