



POSITION PAPER OF IRCU ON THE ALCOHOLIC DRINKS BILL, 2023

The Bill seeks to repeal the Liquor Act, Cop. 93, the Portable Spirit Act, Cop. 97 and Enguli (Manufacturing and Licensing) Act Cop. 86 to enact a comprehensive piece of legislation that contains provisions that address the prevailing circumstances regarding the consumption and challenges caused by the excessive use of, alcoholic drinks particularly, to regulate the manufacture, importation, sale and consumption of alcoholic drinks; to license persons trading in alcoholic drinks and premises where alcoholic drinks are sold; to prohibit the sale of alcoholic drinks to specified persons; to regulate the promotion and advertisement of alcoholic drinks; to create public awareness on the dangers of excessive consumption of alcoholic drinks, to rehabilitate, counsel and treat persons who have developed mental challenges arising from the excessive use of alcoholic drinks.

S/N	CLAUSE	ANALYSIS	RECOMMENDATION
1.	<p>Application This Act does not apply to—</p> <p>(a) the administration or sale of a medicine containing an alcoholic drink for medical purposes and in</p>	<p>The IRCU observes that while the Bill does not seek to apply to the manufacture of native liquor for domestic use or traditional ceremonies. The IRCU</p>	<p>The IRCU proposes that the under Clause 1(b), Parliament should regulate production of native liquor for domestic/traditional use; to ensure that local domestic/local alcohol producers</p>

	<p>accordance with National Drug Policy and Authority Act;</p> <p>(b) the manufacturer of native liquor for domestic use or traditional ceremonies;</p> <p>(c) the manufacture and sale of spirituous, distilled perfume or perfumery;</p> <p>(d) ethanol, methanol, or isopropyl alcohol used in laboratories;</p> <p>(e) the manufacture and sale of industrial alcohol; and</p> <p>(f) alcoholic drinks used for religious Holy Communion.</p>	<p>observes that it is in this area of production where so many people easily have access too to alcoholic drinks.</p> <p>The IRCU further observes that it is easier for persons to buy natively produced beer due to its cheap cost and accessibility within the community, than the actual manufactured beer/alcohol that is sometimes costly and not accessible.</p>	<p>adhere to the set standards of licencing among others.</p>
2.	<p>Object of Act</p> <p>The object of the Act is to—</p> <p>(a) regulate the manufacture, importation, sale, advertisement, and consumption of alcoholic drinks;</p> <p>(b) prohibit the sale of alcoholic drinks to persons under the age of eighteen years and other specified persons; and</p> <p>(c) provide for measures to eliminate illicit trade in alcoholic drinks.</p>	<p>We concur, with the objects of the Bill as proposed by Parliament, however the IRCU suggests that for comprehensiveness, the Bill should capture additional objectives, as suggested by the IRCU herein.</p>	<p>The IRCU recommends additional objectives to the Bill as follows;</p> <p>(a) Developing and strengthening existing national strategies aimed at reducing the harmful use of alcohol. (Including protection against drunk driving, addiction, and mental health issues arising from alcoholism, protect the young generation from the harm brought about by alcohol consumption, promote awareness and preventive interventions of Alcohol, restriction of online Alcohol sale and advertisement,</p>

			<p>Establishing or appointing a main institution or agency to be responsible for mitigation of risks emanating from alcohol drinks)</p> <p>(b) Coordinate alcohol usage strategies in different government sectors and other health departments.</p> <p>(c) Ensuring broader access to information on alcohol consumption and effective public awareness programs and sensitization among all areas of society about the full range of alcohol related harm experienced in society and the need for an existence of effective prevention measures.</p> <p>(d) Raise awareness of alcohol harm to others and among vulnerable groups caused by drinking, avoiding stigmatization and discouraging discrimination among affected groups and individuals.</p> <p>(e) protect the health of the individual in the light of the dangers of</p>
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			<p>excessive consumption of alcoholic drinks;</p> <p>(f) protect the consumers of alcoholic drinks from misleading or deceptive inducements and inform them of the risks of excessive consumption of alcoholic drinks;</p> <p>(g) protect the health of persons under the age of eighteen years by preventing their access to alcoholic drinks;</p> <p>(h) inform and educate the public on the harmful health, economic and social consequences of the consumption of alcoholic drinks;</p> <p>(i) adopt and implement effective measures to eliminate illicit trade in alcohol including smuggling, illicit manufacturing, and counterfeiting;</p> <p>(j) promote and provide for treatment and rehabilitation programs for those addicted or dependent on alcoholic drinks.</p>
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			<p>(k) promote research and dissemination of information on the effects of alcoholic drink consumption, in particular the health risks that may arise therefrom.</p>
<p>3.</p>	<p>Interpretation In this Act, unless the context otherwise requires—</p> <p>“advertisement” means any visual or oral communication, representation, reference, notice or activity of any kind which is intended to promote the sale or consumption of an alcoholic drink;</p> <p>“alcohol” means the product known as ethyl alcohol or any product obtained by fermentation or distillation of any fermented alcoholic product, rectified either once or more often, whatever the origin, and includes synthetic ethyl alcohol, but shall not include methyl alcohol and alcohol completely denatured in accordance with the prescribed formulas;</p> <p>“alcoholic drink” means any liquid, drink or substance containing one-half of one</p>	<p>The IRCU has referred to arrange of other Definitions referring to Alcohol as follows;</p> <p>IRCU notes that Alcohol chemically termed as ethanol is a natural enjoyable substance that causes intoxication while also having a sedative suppressing brain function.</p> <p>Alcohol is an organic substance formed when a hydroxyl group is substituted by hydrogen atom in a hydrocarbon.</p> <p>An alcohol drink is a drink that contains ethanol, a type of alcohol that is produced by fermentation of grains,</p>	<p>IRCU recommends that the element of intoxication and having a sedative suppressing brain function be included in the definition of alcohol.</p>

	<p>percent or more of alcohol by volume, manufactured for human consumption;</p> <p>“authorized officer” means an officer referred to in section 18 of this Act;</p> <p>“board” means the Industrial Licensing Board established under the Industrial Licensing Act;</p> <p>“currency point” has the value assigned to it in the Schedule to this Act;</p> <p>“industrial alcohol” refers to spirits, specially denatured spirits and mineralized methylated spirits or any such spirits with which any substance is mixed, but does not include liquor or alcoholic drinks for human consumption;</p> <p>“law enforcement officer” means a member of the forces or a member of a private security organization whose duty is to maintain law, order and enforce regulations;</p> <p>“licensee” means a person licensed under this Act;</p>	<p>fruits or other sources of sugar.</p> <p>Industrial alcohol is distilled ethyl alcohol normally of high proof produced and sold</p>	
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<p>“licensing authority” means a licensing authority referred to in section 4 of this Act;</p> <p>“manufacture” means to make, produce, process or convert a substance into an alcoholic drink;</p> <p>“manufacturer” means a person engaged in the making, producing, processing, converting a substance into an alcoholic drink;</p> <p>“Minister” means the Minister responsible for health;</p> <p>“native liquor” means an intoxicating drink which is manufactured in accordance with the customs and cultural practices of Uganda, other than by distillation;</p> <p>“package” means a container, receptacle or wrapper in which an alcoholic drink is sold or distributed and includes a carton;</p> <p>“public service vehicle” means a passenger vehicle licensed to carry passengers for a fee, and includes a train</p>	<p>We concur with the Minister of Health, being in charge of matters relating to alcohol however, the minister of trade should be responsible for licensing.</p> <p>The IRCU of the view that the Definition Section should also further define;</p> <p>a) Gazetted Places</p>	<p>IRCU recommends that;</p> <ul style="list-style-type: none"> ➤ Definition of “Minister” – the minister responsible should be the minister of health since it is more of a health issue than a business issue. ➤ The Minister of Trade, Industry and Cooperatives should come in on issues of licensing. <p>The definition of Minister should therefore incorporate both Ministries that is the Ministry of Health and the Ministry of Trade.</p> <ul style="list-style-type: none"> ➤ Include and define gazette places for the sale of Alcohol, to protect minors and to easily monitor the sale and distribution of alcohol.
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	<p>“sell” includes—</p> <p>(a) barter or exchange without use of money;</p> <p>(b) offer or display for sale;</p> <p>(c) supply, or offer to supply, in circumstances where the supplier derives or would derive a direct or indirect pecuniary benefit;</p> <p>(d) supply or offer to supply, gratuitously but with a view of gaining or maintaining customer, or otherwise with a view for commercial gain; or</p> <p>(e) distribution.</p>	<p>b) Adulterated Drinks</p>	<p>➤ Define adulterated Drinks to enable criminalization of the sale and supply of Adulterated Drinks within the Bill as highlighted in Section 28 of the Bill.</p>
<p>4.</p>	<p>Designation of licensing authority</p> <p>For the purposes of this Act, the licensing authority for—</p> <p>(a) the manufacture of an alcoholic drink;</p> <p>(b) erecting, establishing, or operating a factory for the manufacture of an alcoholic drink; or</p> <p>(c) the importation of alcoholic drinks, shall be the Industrial Licensing Board established under the Industrial Licensing Act;</p> <p>(d) the sale of native liquor, in a sub county, shall be the assistant chief</p>	<p>According to the South African Liquor Act 59 of 2003, the Act, The National Liquor Authority of South Africa intends</p> <ul style="list-style-type: none"> • to establish national norms and standards in order to maintain economic unity within the liquor industry, • To provide for essential national standards and minimum standards required for rendering of services, • To provide for measures to promote co-operative 	<p>IRCU recommends that we adopt the wording of the National Liquor Authority of South Africa because its mandate is wider compared to what is prescribed in the Bill.</p> <p>The specific mandatory offices in the Bill could be well elaborated in the regulations of the Act once it's passed.</p> <p>Furthermore, in light of the plans of Governments to merge agencies and departments, Parliament should caution itself while creating these new agencies/Boards. We propose that the Licensing Authority should be a department in the Ministry of Trade,</p>

	<p>administrative secretary and in a town council or division, shall be the town clerk;</p> <p>(e) the sale of alcoholic drinks—</p> <p>(i) in Kampala Capital City, shall be the executive director of the Kampala Capital City Authority;</p> <p>(ii) in a city or municipality, shall be the town clerk; or</p> <p>(iii) in a district, shall be the chief administrative officer.</p>	<p>government in area of liquor regulation.</p>	<p>Industry, and Cooperatives. This should be empowered to supervise City, Municipality and District licencing authorities.</p>
<p>5.</p>	<p>Application for license</p> <p>(1) A person who intends to—</p> <p>(a) erect, establish or operate a factory for the manufacture of alcoholic drinks;</p> <p>(b) manufacture alcoholic drinks; or</p> <p>(c) import alcoholic drinks, shall apply to the board for a licence.</p> <p>(2) A person who intends to sell alcoholic drinks shall apply to the relevant licensing authority for a licence.</p> <p>(3) A person who intends to manufacturer for sale or sale native liquor shall apply to the relevant licensing authority for a license.</p>	<p>According to the Licensing Act 2003 of UK, all sales of alcohol must be made by, or under the authority of, a Personal License Holder. This means that any individual may sell alcohol provided that the sale has been authorized by a Personal License Holder.</p>	<p>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</p> <p>IRCU recommendas that 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.</p>

<p>(4) An application for a licence under this section shall be in the prescribed form, accompanied by a prescribed application fee.</p> <p>(5) The application under this section shall contain the following—</p> <ul style="list-style-type: none"> (a) name of the applicant; (b) copy of the national identification card; (c) age of the applicant, where the applicant is a natural person; (d) a certificate of incorporation, where the applicant is a legal entity; (e) location of business premises; (f) recommendation from leadership of local council 1 where the business is located; and (g) any other information as may be prescribed by regulations made under this Act. <p>(6) The licensing authority shall, in determining the application, be satisfied that—</p> <ul style="list-style-type: none"> (a) the applicant is eighteen years or above, where the applicant is a natural person; (b) the business premises is suitable for the purpose for which the application is sought; and 	<p>According to the USA Federal Uniform Drinking Age Act of 1984 sets the minimum legal drinking age to 21 and every State abides by that standard in the USA.</p>	<p>IRCU recommends that the minimum age for drinking alcohol should be 21 years to protect young drinkers in secondary schools and Universities.</p> <p>The Further recommends that the drinking age should be aligned to the</p>
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	<p>(c) the applicant has complied with any other applicable law.</p> <p>(7) For the purposes of subsection (6)(b), the business premises is considered suitable if it—</p> <p>(a) is not within four hundred meters to a school, health unit, residential area, or place of worship;</p> <p>(b) is not situated at a fuel station; and (c) conforms to the prescribed standards under any written law or regulations issued by the Minister.</p>		<p>age of 21 as proposed in the Uganda Alcohol Policy 2019.</p> <p>Government can impose a penalty of 10% on the Central Government Funds allocations to District Councils and Municipalities annually, when they fail to impose the legal age requirement. These funds may be appropriated to the Alcohol Rehabilitation Fund proposed herein.</p>
6.	<p>Grant of licence</p> <p>(1) The licensing authority may, within twenty-one days after receipt of the application, grant or refuse to grant a licence to the applicant.</p> <p>(2) Where the licensing authority refuses to grant the licence, the licensing authority shall, within seven days of the decision, inform the applicant, in writing, giving reasons for the refusal.</p> <p>(3) An applicant may appeal to the Minister where—</p>	<p>The IRCU conquers with controls pertaining to grant of Licence.</p> <p>However there is need to introduce a Clause that providers</p> <p>Except with the consent of the minister, a licensing authority shall not issue or transfer a license if it is satisfied that the person is;</p> <p>a. Is under the age of 21 years.</p>	<p>IRCU recommends that except with the consent of the minister of Trade, Industry and Cooperatives, a licensing authority shall not issue or transfer a license if it is satisfied that the person applying for a licence is;</p> <p>a) Is under the age of 21 years.</p> <p>b) Has been the holder of a license which had been cancelled.</p>

	<p>(a) the applicant is not satisfied with the decision of the licensing authority; or (b) the licensing authority does not make a decision within the prescribed time.</p> <p>(4) The licensing authority may grant a licence subject to conditions as may be prescribed by regulations made under this Act.</p>	<p>b. Has been the holder of a license which had been cancelled.</p>	
<p>11.</p>	<p>Suspension or revocation of licence (1) A licensing authority may suspend or revoke a licence issued under this Act.</p> <p>(2) A licensing authority may suspend a licence where the licensee fails to comply with a condition of a licence.</p> <p>(3) A licensing authority may, before suspending a licence under subsection (2), direct a licensee to remedy the condition of the licence breached within such a time as the licensing authority may determine.</p> <p>(4) A licensing authority may revoke a licence where—</p>	<p>We conquer</p>	<p>The IRCU recommends that a license should be revoked incase a licensee uses children below age in their adverts.</p> <p>The IRCU further recommends that periodic monitoring and checks be done to ensure that the conditions for grant of licences are complied with.</p>

	<p>(a) there is continuous breach of any of the conditions of the licence by the licensee;</p> <p>(b) the licensee is convicted of an offence under this Act;</p> <p>(c) the licence was granted on the basis of false or misleading information; or</p> <p>(d) the licensee breaches a provision of this Act.</p>		
15.	<p>Information required on package</p> <p>(1) A person shall not manufacture, import, or sell an alcoholic drink unless the package containing the alcoholic drink—</p> <p>(a) bears information as to its constituents; and</p> <p>(b) has health warning messages prescribed by regulations made under this Act.</p> <p>(2) The information in subsection (1) (b) may be in the form of pictures or pictograms.</p> <p>(3) A person who contravenes subsection (1) commits an offence and is liable, on conviction, to a fine not exceeding five hundred currency points or imprisonment for a period not exceeding five years, or both.</p>	<p>The packaging quantity should be specifically stated and also, the kind of packaging material should be specified; that is, glass bottles or plastic bottles.</p>	<p>We recommend packaging of alcohol in glass bottles or plastic bottles to avoid packaging of alcohol in polythene bags. This limit access to alcohol by the youth and children.</p>

<p>17.</p>	<p>Regulation of advertisement of alcoholic drink (1) A person shall not advertise alcoholic drinks using information that is misleading or deceptive.</p> <p>(2) The Minister shall, by regulations made under this Act, regulate advertisement of alcoholic drinks.</p> <p>(3) A person who contravenes subsection (1), commits an offence and is liable, on conviction, to a fine not exceeding one thousand currency points, or to imprisonment for a period not exceeding ten years, or both.</p>	<p>The IRCU concedes with Parliament that there is need to regulate advertisements on alcohol and further define what amounts to misleading and deceptive advertisements.</p> <p>It therefore essential for the minister to regulate the time when the adverts should run for example after 10 pm and not during the morning and working hours.</p> <p>It is expedient that children should be protected from persuasive advertisements regarding alcoholic drinks and any other intoxicating drinks.</p>	<p>IRCU recommends this Clause bans advertisement of alcohol products near schools or local authority play grounds.</p> <p>Furthermore the IRCU notes the need to reduce on the sizes of bill boards regarding Alcoholic Drinks.</p> <p>The length of adverts running on Televisions and radios should be reduced to 10 seconds.</p> <p>We further recommend that adverts should only be played on radios and tvs after 10pm.</p> <p>In the alternative, we recommend the complete banning of alcoholic drinks adverts on Televisions and Radios, just as it is with the Tobacco Products like Cigarettes.</p> <p>The IRCU further prays that Parliament elaborates on the definition of what amounts to misleading and deceptive advertisements.</p>
<p>19.</p>	<p>Powers of authorised officers (1) For the purposes of ensuring compliance with this Act, an authorised officer may—</p>		<p>We recommend that this section should include the right to examine Private vehicles and cargo trucks.</p>

<p>(a) examine or conduct a scientific test on an alcoholic drink to ascertain as whether the alcoholic drink meets the standard prescribed in regulations;</p> <p>(b) at any reasonable time, enter, inspect or search premises or a public service vehicle where the authorised officer reasonably suspects that any provision of this Act has been contravened;</p> <p>(c) seize an alcoholic drink, a container or a vehicle containing alcoholic drinks;</p> <p>(d) require a person to produce a document, licence or any information; or</p> <p>(e) cause discontinuation of, confiscate or destroy any advertisement that does not conform to the requirements prescribed under this Act.</p> <p>(2) An authorised officer shall, before exercising any powers under this Act, produce official identification showing him or her to be an authorised officer.</p> <p>(3) The Minister may, by regulations, prescribe the manner in which an alcoholic drink, container or vehicle</p>		<p>We recommend that an authorized person may require a person with books of accounts relevant to a liquor business to produce such books of accounts for as long as such books of accounts are necessary for inspection.</p>
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	<p>containing alcoholic drinks, which is seized, may be stored, or disposed of.</p>		
<p>20.</p>	<p>Order for restoration</p> <p>(1) A person from whom an alcoholic drink, container or vehicle containing alcoholic drinks is seized may apply to court for an order of restoration.</p> <p>(2) A person who claims any interest in an alcoholic drink, container or vehicle containing alcoholic drinks seized by an authorised officer under section 19(1) (c), may within thirty days of seizure, apply to court for release and restoration of the seized alcoholic drink, container or vehicle containing alcoholic drinks if—</p> <ul style="list-style-type: none"> (a) the alcoholic drink, container or vehicle containing alcoholic drinks was seized under mistaken identity; (b) the applicant was licenced to conduct the business; or (c) there was no breach of the provisions of this Act. <p>(3) A court may order that the alcoholic drink, container or vehicle containing alcoholic drinks seized under section 19 be restored to the applicant.</p>		<p>IRCU recommends that this Clause should be limit the sale of alcoholic drinks to non-uniformed officers, armed personnel, pregnant women, civil servants, regulate the sale of alcohol to already intoxicated persons.</p> <p>The IRCU recommends that a penalty should be imposed on buyers of alcoholic under these proposed categories.</p>

<p>22.</p>	<p>Prohibition of manufacturing, importation or sale of alcoholic drinks without licence</p> <p>(1) A person who, without a licence— (a) manufactures an alcoholic drink; (b) erects, establishes or operates a factory for the manufacture of alcoholic drink; (c) imports an alcoholic drink; (d) manufactures native liquor for sale; or (e) sells an alcoholic drink, commits an offence.</p> <p>(2) A person, who contravenes subsection (1) (a), (b) or (c) is liable, on conviction, to a fine not exceeding one thousand currency points or imprisonment not exceeding ten years, or both.</p> <p>(3) A person, who contravenes subsection (1) (d) or (e) is liable, on conviction, to a fine not exceeding five hundred currency points or imprisonment not exceeding five years, or both.</p>	<p>IRCU draws lessons from the UK Licensing Act 1872.</p> <p>The UK Licensing Act 1872 provides that "no person shall sell or expose for sale by retail any intoxicating liquor without being duly licensed to sell the same, or at any place where he is not authorized by his license to sell the same. Any person who contravenes this section is subject to penalties which include;</p> <ul style="list-style-type: none"> • A penalty not exceeding fifty pounds or to imprisonment with or without hard labor for a term not exceeding one month, • A penalty not exceeding 100 pounds, or imprisonment with or without hard labor for a term not exceeding three months, and he may, by order of court be disqualified for any term not exceeding five years from holding any 	<p>IRCU recommends that the sentences proposed to seem to be more punitive than corrective. We therefore propose penalties as follows;</p> <ul style="list-style-type: none"> • For individuals, the sentence should be 100 currency points. • For factories the 1000 currency points is okay. • In terms of imprisonment, we suggest 2years as the sentence.
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		<p>license for the sale of intoxicating liquor.</p> <p>For individuals, the sentence should be 100 currency points.</p> <p>For factories the 1000 currency points is okay.</p> <p>In terms of imprisonment, we suggest 2years as the sentence.</p>	
23.	<p>Prohibition of sale or consumption of alcoholic drinks in public service vehicle</p> <p>(1) A person shall not sell or consume an alcoholic drink in a public service vehicle.</p> <p>(2) A person who contravenes subsection (1) commits an offence and is liable, on conviction, to a fine not exceeding two hundred currency points or imprisonment for a period not exceeding six months, or both.</p>		<p>IRCU recommends that this Clause should restrict the sale of alcohol to Private vehicles and cargo trucks.</p>
24.	<p>Prohibition of sale of alcoholic drinks to law enforcement officer</p> <p>A person who sells an alcoholic drink to a law enforcement officer in uniform commits an offence and is liable, on</p>		<p>The IRCU recommends that there should be a clause prescribing for an offence or penalty where a law enforcement officer in uniform purchases alcohol.</p>

	conviction, to a fine not exceeding two hundred currency points or imprisonment for a period not exceeding six months, or both.		
25.	<p>Prohibition of sale or supply of alcoholic drinks to person below eighteen years</p> <p>(1) A person shall not sell or supply an alcoholic drink to a person below eighteen years of age.</p> <p>(2) Where age is in doubt, a person buying or being supplied with alcohol drinks may prove his or her age by adducing a copy of national identification card, passport or any other document as may be prescribed by the minister, by regulations.</p> <p>(3) A person who contravenes subsection (1) commits an offence and is liable, on conviction, to a fine not exceeding two thousand currency points or imprisonment for a period not exceeding three years, or both.</p>	<p>The age should be changed to 21 years.</p> <p>We concur.</p> <p>We suggest that the fine be reduced to 250 currency points and imprisonment be set at one year.</p>	<p>IRCU recommends that;</p> <p>The age should be 21 years in order to cater for those still in high school and to also align with the age specified in the alcohol policy.</p> <p>Subsection (3) should be mandatory therefore the word shall should be used instead of May.</p> <p>IRCU recommends that the fine be reduced to 250 currency points and imprisonment be set at one year.</p>
26.	<p>Packaging of alcoholic drinks in sachet or plastic bottle</p> <p>(1) A person shall not pack, import or sell an alcoholic drink in a sachet, plastic bottle or such other form as may be</p>	<p>Sachets should be dealt away with since they are very cheap and can easily be accessed by everyone.</p>	<p>The IRCU recommends that there's need to prescribe the specific form in which packaging should be done regarding alcoholic drinks</p>

	<p>prescribed by Minister, by regulations, made under this Act.</p> <p>(2) A person who contravenes this section commits an offence and is liable, on conviction, to a fine not exceeding one thousand currency points or imprisonment for a period not exceeding five years, or both.</p>	<p>These sachets also contribute to the degradation of the environment.</p> <p>We suggest that the fine be reduced to 250 currency points and imprisonment for one year.</p>	<p>The IRCU recommends that during packaging the minimum volumes should be specified for example not less than 500mls, to make it hard for people to move around with the alcohol in their pockets.</p> <p>IRCU recommends that the fine be reduced to 250 currency points and imprisonment for one year.</p>
<p>PART V. Promotion and advertisement of an alcoholic drink.</p>		<p>The title should be changed to regulation of the 'promotion and advertisement of an alcoholic drink,' so that it does not look like it's promoting the advertisement.</p>	
<p>27.</p>	<p>Packaging of alcoholic drinks in a package of less than five hundred milliliters.</p> <p>(1) A person shall not pack or import an alcoholic drink in a package of less than five hundred milliliters.</p> <p>(2) A person who contravenes this section commits an offence and is liable, on conviction, to a fine not exceeding five hundred currency points or imprisonment for a period not exceeding five years, or both.</p>	<p>We concur.</p> <p>We suggest that the conviction be reduced to one-year imprisonment.</p>	<p>IRCU recommends that the conviction be reduced to one-year imprisonment.</p>

28.	<p>Prohibition of sale of adulterated alcoholic drinks</p> <p>(1) A person shall not sell an alcoholic drink that is adulterated.</p> <p>(2) A person who contravenes subsection (1) commits an offence and is liable, on conviction, to a fine not exceeding two hundred currency points or imprisonment for a period not exceeding five years, or both.</p> <p>(3) For purposes of this section, “adulterate” means to falsify or conceal the quality of an alcoholic drink by the combination with it or to it of a substance, matter or thing, whether harmful or not with the intention of distorting the nature or substance of the alcoholic drink.</p>	<p>We concur.</p> <p>The UK Licensing Act 1872, Any person who knowingly sells or keeps or exposes for sale any intoxicating liquor mixed with any deleterious ingredient referred to as adulterated liquor shall be liable to a penalty not exceeding 20 pounds or to imprisonment for a term not exceeding one month.</p> <p>The term of imprisonment should not exceed one year.</p>	<p>IRCU recommends that the term of imprisonment should not exceed one year.</p>
30.	<p>On-line sale of alcoholic drinks</p> <p>(1) A person shall not sell an alcoholic drink through electronic or telecommunication medium unless he or she has means of verifying the age of the buyer.</p>	<p>Online sale of alcohol is experiencing rapid growth in many places accelerated by the Covid19 pandemic prompting new laws and regulations. There are no comprehensive and</p>	<p>IRCU recommends that this bill prohibits the online sale of alcohol drinks, especially to minors.</p> <p>IRCU recommends that the imprisonment term be reduced to one year.</p>

	<p>(2) A person who contravenes subsection (1) commits an offence and is liable, on conviction, to a fine not exceeding two hundred currency points or imprisonment for a period not exceeding five years, or both.</p>	<p>systematic analyses of the laws or their effectiveness.</p> <p>We recommend that the imprisonment term be reduced to one year</p>	
31.	<p>Prohibition of employment of person below eighteen years of age</p> <p>(1) A licensee shall not employ or permit a person below eighteen years of age in premises in which an alcoholic drink is manufactured, sold, stored or consumed.</p> <p>(2) A person who contravenes subsection (1) commits an offence and is liable, on conviction, to a fine not exceeding one thousand currency points or imprisonment for a period not exceeding two years, or both.</p>	<p>We Conquer with this age proposal because at 18 a person has a right to be employed in any business undertaking.</p> <p>We suggest that the fine be reduced to 250 currency points.</p>	<p>IRCU recommends that the age of employment in alcoholic business be maintained at 18 but revise the legal drinking age to 21.</p> <p>IRCU recommends that the fine be reduced to 250 currency points.</p>
33.	<p>Making false or misleading statements to authorised officer</p> <p>A person who makes a false or misleading statement to an authorised officer commits an offence and is liable, on conviction, to a fine not exceeding</p>	<p>We suggest that the term of imprisonment be reduced to one year.</p>	<p>IRCU recommends that that the term of imprisonment be reduced to one year.</p>

	one hundred currency points or imprisonment not exceeding five years, or both.		
34.	<p>Regulations</p> <p>(1) The Minister may, by statutory instrument, make regulations generally for the better carrying out of the objects of this Act.</p> <p>(2) Without prejudice to the generality of subsection (1), the Minister shall make regulations in respect of the following matters—</p> <p>(a) the procedure for application for licenses;</p> <p>(b) fees or charges payable under this Act;</p> <p>(c) means of verifying the age of a person as required under this Act; and</p> <p>(d) standards and quality for alcoholic drinks.</p>	We suggest the emphasis on the word shall instead of may so that the provision becomes mandatory.	IRCU recommends that the word May be replaced with shall.