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## **ADDICTION PREVENTION AND REHABILITATION ASSOCIATION OF UGANDA**

### **Submission To the Parliamentary Committees of Health and Trade**

#### **ALCOHOL CONTROL BILL 2023**

### **Introduction**

Addiction Prevention and Rehabilitation Association of Uganda (APRAU) is an umbrella body for private institutions currently involved in the prevention, treatment, and care for addiction and mental illnesses in Uganda. Every year our respective member organizations provide treatment and care to thousands of Ugandans struggling with addiction to alcohol. Our combined experience puts us in a unique position to sound the call to Members of Parliament, Government, and the General Public for an effective Alcoholic Drinks Control Bill.

Alcohol addiction (Alcohol Use Disorder) is by far and large a medical condition characterized by continued use of alcohol despite the negative consequences. Discussing the disease of alcohol addiction is quite broad and outside the scope of this submission. It is important to note, however, that some of the key causes and risk factors include:

1. **Alcohol Addiction is a Medical Condition:** As a brain disease AUD requires medical and psychological treatments to control it.
2. **Family History with Alcohol Addiction and Genetic Factors:** Part of this is due to genetics, but the other part has to do with your environment.
3. **Peer Pressure:** Spending time around people who drink heavily, or abuse alcohol can influence an individual, leading to higher risk of alcohol abuse for generations to come. Giving into peer pressure can lead to drinking problems down the road, as well as many health complications that arise from excessive alcohol consumption. This is especially true for adolescents and young adults.
4. **Drinking at an Early Age:** those who begin drinking at an early age are more likely to have an alcohol problem or a physical dependence on alcohol as they get older. This is especially true when adolescents engage in frequent binge drinking. While

drinking early on can increase the likelihood of alcohol abuse, alcoholism can affect anyone at any age.

5. **Frequent Alcohol Consumption Over a Long Period:** When drinking too much becomes a pattern, individuals greatly increase their chances of developing an alcohol-related problem. The more one drinks, the more your body builds a tolerance to alcohol requiring more amounts to feel the same effects one used to feel with less.

The above factors clearly make a case for regulation of the manufacture, importation, sale, consumption, and marketing of alcoholic drinks to protect the young people. It is imperative that Parliament of Uganda in considering this bill, **perceives it from the premise of public health and the need to address health, social and economic harms caused by alcohol**

Legislation to control the manufacture, distribution, advertising, promotion, and consumption of alcohol in our country is long overdue and we welcome the Alcoholic Drinks Control Bill. Uganda is characterized by the high prevalence of underage drinking, soaring cases of alcohol consumption among the public, and escalation of negative consequences. Unfortunately, the response to Alcohol Use Disorders is still inadequate.

### Underage drinking and alcohol use in educational institutions

We are experiencing worrying trends of alcohol consumption among young people. According to the Uganda Alcohol Report 2022, trends of alcohol use among young people:

- a. Age of first use - 8 years.
- b. Alcohol users before 18 years - 53%
- c. Prevalence of any alcohol use among university students - 31%.
- d. Ever used alcohol in Secondary schools - 70%
- e. Teenage drinkers involved in binge drinking 90%

### High Alcohol Consumption

The common observable drinking features and patterns for young people in any city, town, trading centre and village involve binge drinking during working hours, at public events and parties and promotions.

### Wide prevalence of negative alcohol consequences

Some studies such as Graham et al (2013) have documented Uganda to suffer highest levels of post alcohol consumption negative outcomes globally. These patterns and general risk-taking behaviour among youths place them at considerable risk for harm. Alcohol is associated with a multitude of negative health, social and economic

consequences. These are documented and include but are not limited to: Dependency/Addiction and a gateway to Substance use Disorders, Mental illness (Such as Depression, Psychosis), Disrupted family life and social connections of the individual- isolation (Unstable and broken families), Low education attainment and dropping out of school, Uncivil behaviours and delinquency leading to increased community crime, Homicides, Violence and general insecurity, low productivity and Occupational Impairment (Unemployment or difficulty to keep down a job), poverty Risky sexual behaviour and increased risk of sexually transmitted infections and unplanned pregnancies. **At a public level alcohol use is associated with increase in public expenditures such as health care costs and security and safety among others**

### Acute Shortage of Alcohol Treatment services

Uganda is estimated to have about Four million cases on Alcohol Use Disorders. The current combined response by government and public sector does not meet even 10% of the treatment needs for AUDs in Uganda.

While our efforts and activities are meant to supplement the government health system in dealing with the challenge of addiction and dependence on alcohol and drugs it is worth noting that as an association APRAU has a combined bed-capacity of more than **500 beds** for inpatient treatment and care for individuals struggling with addiction to alcohol, drugs, and other mental illnesses and disorders. We understand the Uganda has one specialized public institution for the treatment of Alcohol and Substance Use Disorders with a **bed capacity of 80 patients**.

We agree with and affirm our support for most of the provisions of this bill especially those relating to:

- Time limits on availability
- Ban of alcohol on public transport
- Online retail ban
- Health warning labels on products
- Health warning labels on places

## PROPOSALS

1. In our submission, we make a case for a provision in this Bill for the government to establish more Treatment and Rehabilitation Centres across the country. Treatment and care for alcohol addiction is by its very nature expensive as it normally involves inpatient care and other holistic approaches including medical, psycho-social support and other therapies. We recognize that most of the general public cannot afford the high cost of treatment and therefore make the case for increased government support and involvement in addiction treatment and care. This bill should have provisions for this.
2. In the last paragraph under “The defects in the existing legal framework” we propose that you include more diseases to which alcohol is a known risk factor. These include Mental Illnesses, Tuberculosis, HIV/AIDS and other sexually transmitted diseases, Pneumonia, lower respiratory infections, lip, oral cavity and other pharyngeal cancers, Oesophageal cancer, Colon and rectal cancers, Liver cancer, Laryngeal cancer, Breast cancer, Diabetes mellitus, Hypertensive heart disease, Ischemic heart disease, Haemorrhagic stroke, Ischemic stroke, Cardiac arrhythmias, Liver cirrhosis, Pancreatitis and Epilepsy.
3. Interpretation of “Alcoholic Drink”. We propose that this interpretation is amended to read: ***“Alcoholic drink includes alcohol, spirit, wine, beer traditional alcoholic drink, and any one or more of such varieties containing one-half of one percent or more of alcohol by volume, including mixed alcoholic drinks, modified industrial alcohol blended for human consumption and every liquid or solid, patented or not, containing alcohol and capable of being consumed by a human being”.***
4. Under “Remedies proposed in the bill (c)” we propose that the sale of alcoholic drinks **be prohibited to persons below the age of 21 years of age** as opposed to 18 years. Setting the legal drinking age at 21 years is a public health measure aimed at protecting young individuals from the potential harms associated with alcohol use during a critical period of development. Here are some key evidence-based reasons supporting the legal drinking age of 21. The human brain continues to develop throughout adolescence and into the early twenties. Exposure to alcohol during this critical period can have lasting effects on cognitive function, memory, and decision-making. Setting the legal drinking age at 21 helps to minimize the impact of alcohol on developing brains. Young adults are at a higher risk of engaging in risky behaviours, including impaired driving. Studies have shown that setting the legal drinking age at 21 is associated with a reduction in alcohol-related traffic accidents and fatalities among young drivers. Research indicates that delaying the onset of alcohol consumption until the age of 21 is associated with lower rates of alcohol-related harm, including injuries, accidents, and alcohol use disorders, particularly among college students. Early alcohol use has been linked to higher rates of high school dropout. Delaying legal access to alcohol until the age of 21 may contribute to better academic outcomes and increased opportunities

for future success. Furthermore, establishing a legal drinking age of 21 helps to shape social and cultural norms around responsible alcohol consumption. It sends a clear message that underage drinking is not socially acceptable, contributing to a safer and healthier community environment.

5. Under ADVERTISEMENT Of ALCOHOLIC DRINKS (17). Regulation of advertisement of alcoholic drinks, we propose the following:
  - Include Provisions to regulate advertisement of alcoholic drinks during the prime time and other times that children are more likely to watch TV should be included. Restricting alcohol advertisements during children's viewing hours helps ensure responsible marketing practices, minimizing the potential for alcohol brands to create positive associations with their products among young viewers.
  - Include a provision to ban the use of roadshow promotional vehicles, trailers, and outdoor broadcasting vehicles for the purposes of marketing and promoting alcoholic drinks in public areas where children and adolescents are likely to be a targeted or unintended audience.
  - Include a provision to ban alcohol advertisement in schools, health facilities, places of worship and other public places where children gather. Exposure to alcohol advertising may contribute to increased drinking among adolescents, potentially affecting academic performance. Prohibiting alcohol promotion in schools helps create an environment conducive to learning and well-being. Children and adolescents are considered vulnerable to the persuasive effects of advertising. Prohibiting alcohol promotion in settings specifically designed for children, such as schools and sports activities, aims to protect them from undue influence and potential harm.
  - Include a provision to ban promotion and sponsorship during children sports and other games activities. Alcohol advertising can shape normative beliefs about alcohol consumption. Banning alcohol promotion in children's sports activities and schools aims to prevent the normalization of alcohol use among youth
6. Include a provision to ban the use of alcoholic drinks as a prize at a public functions and spaces.
7. Include a provision to ban the use of free sampling of alcohol to the general public.
8. **National Alcohol Control Board:** We propose that the bill provide for the establishment of a National Alcohol Control Board the membership of which will be multi-sectoral. This board will that oversee the implementation of the Act and provide national guidance on any new or emerging approaches to regulation and control of alcoholic drinks. The board would ensure:

- a. the prevention of dominance by the alcohol industry.
- b. prohibitions on advertising that targets youth.
- c. pricing and other fiscal controls designed to limit excessive consumption.
- d. an effective and responsive enforcement system.
- e. Appropriate Treatment and rehabilitation initiatives.

Membership of this board would include inter-alia; The Ministry of Health, Ministry of Trade, Industry and Commerce, Uganda National Bureau of Standards, Uganda Revenue Authority, Ministry of Information Communication and Technology/Uganda Communication Commission, Ministry of Local Government, and representation from civil society.

9. We also propose that this Bill provide for the establishment of **Alcoholic Drinks Control Fund**. Regulation is essential. However, it is not free. Regulation of the alcohol industry requires increased resources to ensure proper regulation and enforcement. This fund would be used to facilitate the activities of the National Alcohol Control Board and mitigate the health burden of alcohol use through the treatment of individuals with Alcohol Use Disorders and other related illnesses. This model had proven to be effective in several other countries including our neighbours such as the Republic of Kenya.
10. We note with grave concern that the bill in its current form is not protected from interference by any party that is opposed to its implementation. We propose a provision to regulate interference by the Alcohol Industry. The alcohol industry has historically tended to prioritize profits over public health. Regulating industry interference helps manage potential conflicts of interest, ensuring that alcohol control laws are designed and implemented to protect public health and well-being.

We thank these committees for granting us the opportunity to present these views and pray that they will be duly considered and adopted.

**FOR GOD AND OUR COUNTRY**

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