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Regulating alcohol packaging and supply to protect health in Sub- Saharan Africa: evidence from policy systems in Malawi and Uganda (RAPSSA)

2022-2024

BE THE DIFFERENCE

The RAPSSA Research Team

- **Dr Isabelle Uny** , Senior Research Fellow, Institute for Social Marketing and Health (ISMH) Faculty of Health Sciences & Sport, University of Stirling, UK ([Principal Investigator](#))
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- **Prof. Niamh Fitzgerald**, Professor of Alcohol Policy & Director of the Institute for Social Marketing and Health (ISMH), Faculty of Health Sciences & Sport, University of Stirling, UK.
- **Prof. Linda Bauld**, Bruce and John Usher Professor of Public Health, University of Edinburgh, UK

(We have no conflict of interest to declare)

Rationale for the project

To understand better the **actors/content/processes of alcohol policy making** in the Global South

To learn lessons and explore **potential factors for transferability** to other countries in the region



Photo: Daily Monitor, Uganda

Aims of the project (and what we will focus on today)

To understand the context, the formulation and the implementation of the bans of alcohol sachets in Malawi and Uganda

Explore mechanisms for implementation and enforcement

Explore stakeholders and public perceptions of, and explanations for, intended and unintended consequences of those bans.





Policy Documents Analysis

& Key Informants
interviews (~ 9 per
country)

Focus on
rationale/context/
formulation of the bans



Interviews with national and district stakeholders

(~10 per country)
responsible for the
dissemination &
enforcement of the bans

*Focus: implementation
and enforcement
experiences*



Focus group discussions

(~9 per country, 1
District) w. young people
/adult community
members & other
community stakeholders

*Focus: perceptions of
implementation,
consequences, & new
consumption patterns at
community level*

...ONGOING PROJECT TILL 2024...

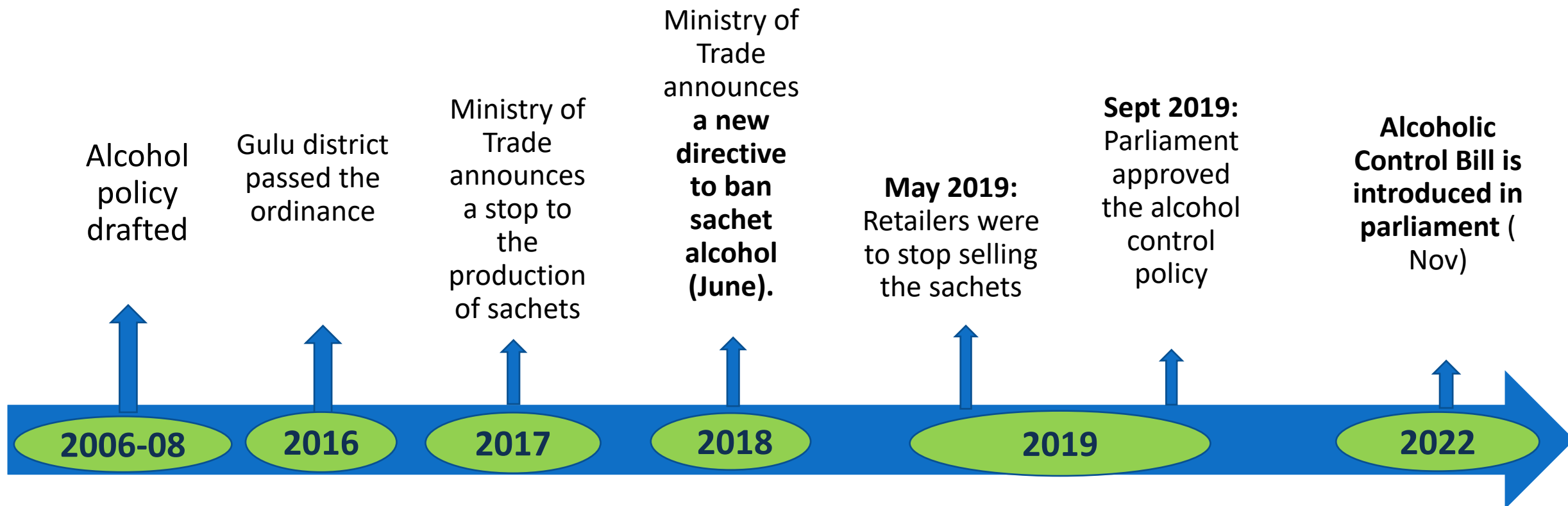
Today we present preliminary results on:

UGANDA INTERVIEWS (n=6)	UGANDA DOCUMENTS (n=5)
<ul style="list-style-type: none">• 4 Government representative• 2 Non-governmental representatives	<ol style="list-style-type: none">1. Uganda National Alcohol Policy (2019)2. Official document3. Gulu district: Towards an alcohol ordinance report4. Gulu District Local Government alcoholic drinks control ordinance, 20165. Gulu District Local Government alcoholic drinks control ordinance minutes and summary, 2016
MALAWI INTERVIEWS (n=6)	MALAWI DOCUMENTS (n=5)
<ul style="list-style-type: none">• 4 Government representative• 2 Non-governmental representatives	<ol style="list-style-type: none">1. Malawi National Alcohol Policy2. Malawi Government Gazette supplement 2015-04-30 number 73. Fighting Poverty Through Alcohol Misuse Prevention in Malawi (ALMA) report (2013)4. The State Vs the Malawi Bureau of Standards High court review (2015)5. Malawi Nyasa Time article 9 September 2014: “Sachet spirits are not illegal”- Malawi Alcohol Manufacturers

Interviews downloaded into Nvivo for Thematic analysis (Braun & Clarke 2008,2023); Documents analysed through document extraction tools inc. specific domains (using frameworks from Dalglish et al 2020; Bertscher et al., 2018, Berlan et al., 2014).



PRELIMINARY RESULTS



Timeline of alcohol sachets ban in Uganda

Rationale & goals of the sachet ban in Uganda

- Sachets were seen as readily available and accessible e.g. in boda-bodas; cheap & concealable, especially to young people
- Sachets were linked to harmful consumption (also causing road traffic accidents; domestic violence and other social harms)

The ban aimed to:

- Address the deaths attributed to adulterated spirits packaged in sachets (Gulu ordinance).
- To generally improve public health and specifically to protect under-age consumers from harmful drinking (stated goal of the national alcohol policy (which inc. sachet ban).

Formulation of the sachet ban in Uganda

- Initial content of the national alcohol policy (inc.sachet ban) by Ministry of Health– but delayed because of opposition and interference by multiple actors
- Gulu District: local community concerns led to alcohol abuse ordinance inc. a sachet ban
- The sachet ban was made national by the Ministry of Health and included inthe National policy going through parliament for legislation this year

Key stakeholders roles:

- Gulu district communities and officials laid the groundwork for the National level ban
- Strong Advocacy throughout from CSOs, NGOS and coalitions (UAPA) which influenced National Alcohol policy (they used evidence on harms) .
- During the development of the Minister’s directive on the sachet ban, multiple stakeholders & multisectoral meetings addressed resistance and ensured buy-in from all
- Large alcohol industry actors were not resistant to the ban BUT Small traders were resistant.

Enforcement of the sachet ban in Uganda

At local level in Gulu:

- Penalty: fine or imprisonment, suspension of trading licence
- An enforcement team was established & moved in the community to sensitise
- In practise: some sales continued, police burnt sachets; manufacturers and traders were arrested (but no jail or penalty) and their goods were confiscated.

At National level:

- A 12 people Committee (inc. Uganda Revenue Authority, Ministry of Trade, Uganda Police, KCCA, Uganda Revenue, UNBS) formed to oversee implementation and enforcement
- Local authorities/councils, District internal security officers, and Police, Resident District Commissioners, National Environment Management Authority co-enforcers

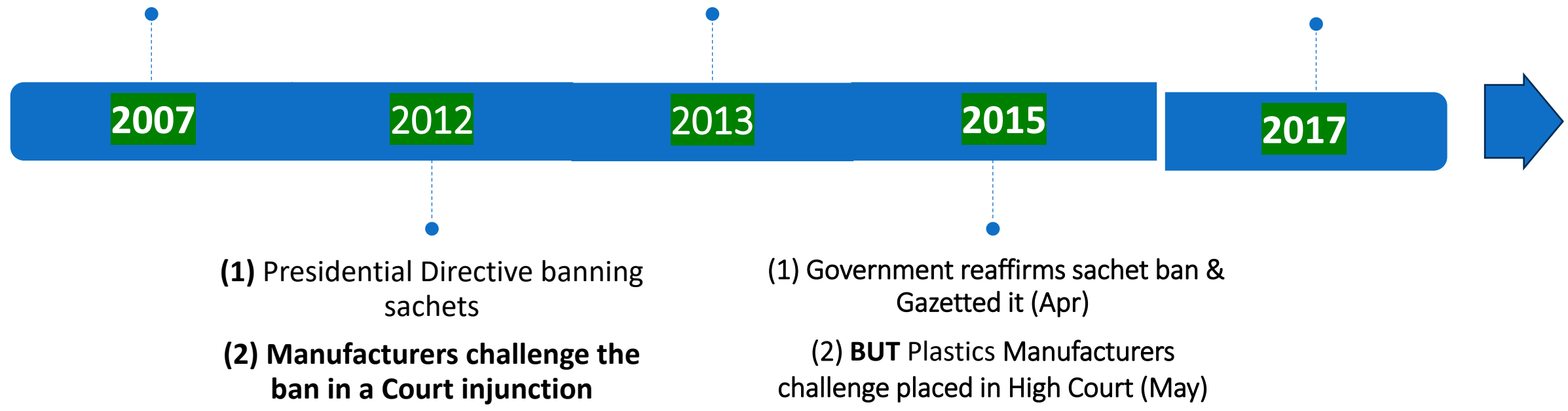
Perceived effectiveness? (Interviews) sachets mostly disappeared; reduced consumption in some groups (boda bodas), supply reduced especially in urban sub-counties. **HOWEVER:** evidence of consumption of small bottles (200ml)

(1) Concerns about Alcohol Sachets in Malawi
(2) National alcohol policy drafting started

Government changes Minimum legal Volume from 30 ml to 100ml

(1) High Court Ruling defeats manufacturers (Sachet Ban reinstated for good)
(National Alcohol Policy Published)

Ministry of Trade, Industry and Tourism has shut down 13 manufacturers of liquor which is packaged in plastic bottles/sachets.



Timeline of alcohol sachets ban in Malawi

Rationale & goals of the sachet ban in Malawi

- Sachets were seen as having proliferated, accessible everywhere ; very cheap and concealable; especially a danger to young people
- Sachets were linked to some deaths, delinquency and crime, minibus road accidents; and seen as having other social impacts (e.g. on youth education)

The ban aimed to:

- (interviews)Protect young people in schools from using alcohol sachets.
- To curtail availability of a cheap, simply packaged easily accessible alcohol
- To deal with an increase of alcohol related deaths and other social harms
- The national alcohol policy and other documents did not state a specific goal for sachet ban

Formulation of the sachet ban in Malawi

- The content of the sachet ban and National Alcohol Policy (NAP) developed by the Ministry of Health over time in consultation

Key stakeholders roles:

- Advocacy from NGOs , CSOs and coalitions (MAPA) meeting with Ministries about the NAP
- The 2012 ban was issued as President's directive (discussed in Parliament); published in Gazette by Malawi Bureau of Standards (implementer)
- Sachet manufacturers obtained a court injunction in 2012 against the Directive stalled implementation; In 2015 court ruled against them
- Packaging industries challenged the sachet ban again in 2015 at High Court of Malawi but lost the case and the ban was reaffirmed for good in 2017

Formulation of the sachet ban in Malawi

Who is in charge of enforcement?

- Malawi Bureau of Standards and the Malawi Ministry of Trade and Industry; Other co-enforcers inc. Department Road Traffic, Ministry of Home Affairs, Ministry of Civic Education
- Potential penalty: Imprisonment (12 months), revoking of licences to trade

What happened in practise after 2015 (Interviews)

- Confiscating of alcohol in sachets and plastic containers from traders; manufacturing premises and fines for non-compliant manufacturers. MBS national inspection campaign
- At district level, the ban was incorporated into the local government authority (councils) bylaws, and enforced by district authorities
- **Perceived effectiveness? (Interviews):** disappearance of sachets on markets. Lesser perceived prevalence of alcohol abuse;

HOWEVER: small alternative packaging now consumed (e.g small bottles 200mls/330mls)

LESSONS LEARNT & POINTS FOR DISCUSSION

- In-depth Comparison of Bottom up (Uganda) vs Top Down (Malawi) alcohol policy processes; still rare in LMIC
- Mechanisms for evaluation of bans are weak; no evaluations yet; need to be built in at the start
- The National Alcohol Policies (NAPs) did not pre-empt what may replace the sachets (e.g. small bottles of 100/200mls-- to be explored in our focus group discussions)
- Industry interference can stall formulation and implementation of these policies to regulate packaging (e.g. Manufacturers challenges in Malawi; small traders opposition in Uganda)
- We are interested to compare what happens when a National Alcohol Policy is inscribed into legislation (Uganda currently) or not (Malawi)- and whether this has an impact on implementation and enforcement.



We wish to Thank the RAPSSA Project Advisory Group

- **Florence Baingana**, Regional Advisor, Mental Health and Substance Abuse at WHO African Region
- **Ms Sophia Komba****, Chairperson of the East Africa Alcohol Policy Alliance (EAAPA) based in Tanzania
- **Dr Franklin Umenze**** Executive Director of the Association of Advocates Against Alcohol Harm in Nigeria (ASAAHN); Board Chair of the West African Alcohol Policy Alliance (WAAPA)
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- **Ms Prisca Mokgadi****, Southern African Alcohol Policy Alliance (SAAPA)-Botswana
- **Dr David Kalema**, Director, Hope and Beyond & Immediate past chair of UAPA
- **Mrs Juliet Namukasa**, Chair of the Uganda Alcohol Policy Alliance (UAPA) and Country Director of International Aid Services (IAS) Uganda.
- **Mr Paul Mmanjamwada**, Head of Programs, Norwegian Church Aid and Danish Church Aid in Malawi and a Member of the SAAPA Board for Malawi.
- **Mrs Mphatso Baluwa**, Malawi Girl Guides Association (MAGGA)
- **Mr Nelson Zakeyu**, National Coordinator of Drug Fight Malawi and Executive Director of MAPA
- **Dr Jeremy Shiffman**, Bloomberg Distinguished Professor at Johns Hopkins University (USA)
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Please get in touch if you have any questions

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