

Does Uganda's food policy environment respond to the food safety needs of the population?



Executive summary

Food safety involves preventive practices at any point in food-related operations, such as receiving, storing, processing, handling, and distributing. The Ugandan government has, over the years, been intensifying efforts to improve the standard of food safety and food safety practices with little success, especially regarding implementation. The food supply chain of Uganda has seen several challenges, including chemical substances of public health concern that have been detected in food and food products in the market. Given these challenges, this brief examines the gaps in the current regulatory environment and recommends establishing an independent Food Authority. It also recommends reviewing the 1964 Food and Drugs Act to cater to technological changes and restore hygiene and sanitary inspections—to ensure an enhanced food safety environment.

Introduction

Accessing safe and nutritious food is key to sustaining life and promoting good health. Food safety involves preventive practices at any point in food-related operations, such as receiving, storing, processing, handling, and distributing (WHO, 2022)¹. The nutrients we get from food give us the energy and nourishment used to perform our daily activities. On the other hand, unsafe food contains harmful bacteria, viruses, parasites, or chemical substances that can cause

food-borne diseases. Micronutrient-dense foods important to high-quality diets, such as vegetables, fruit, meat, and dairy, are at particular risk of contamination by microorganisms associated with food-borne diseases.

Unsafe food creates a vicious cycle of disease and malnutrition, particularly affecting infants, young children, the elderly, and the sick. 1.3 million Ugandans are diagnosed with food-borne illnesses annually, constituting 14% of all human ailments treated annually

(Lake et al., 2015)². Gastrointestinal illnesses are the most common manifestation of food-borne disease and are particularly associated with undercooked meat, eggs, fish, fresh produce, and dairy products.

The food supply chain of Uganda has seen several challenges. For instance, chemical substances of public health concern such as arsenic, cadmium, mercury and pesticides; insecticides; and residues of disinfectants and veterinary drugs have been detected in food and food products in the market (UNBS, 2019)³. The Ugandan government is mindful of the challenges. It has, over the years, been intensifying efforts to improve the standard of food safety and food safety practices across each food supply chain sector.

Several measures have been put in place to ensure food safety, such as the strategic action plan for prevention and control of aflatoxin designed to ensure food safety through control of aflatoxins in the food chain, Food safety law, and regulation in the marketing of infant and young child foods which provides the legal framework for protecting children from artificial undesirable breast milk substitutes. In addition, UNBS has established food testing laboratories to verify claims on foodstuff. Despite these efforts, no single agency, institution, or authority is responsible for food safety issues. The fundamental law that governs food safety is the Food and Drugs Act of 1964, which has not been amended to account for changes in technology, rising food safety issues, and challenges related to agricultural practices, food production, preparation, storage, and transportation.

This brief is an excerpt from the Ugandan Food Environment Policy Index (Food EPI) study on “*Assessment of policies and identification of context-specific regulatory interventions for a healthier food environment to prevent diet-related Non-Communicable Diseases (NCDs) in Uganda*” (Odokonyero et al., 2021)⁴. The study provides a benchmarking assessment of evidence for existing policies and laws and identifies how these promote food safety.

Key Findings

The food policy environment is diverse, but food safety is limited to a few policies and laws. Over 23 food and nutrition laws, 6 policies, 9 regulations, 12 strategies and plans, and several standards are in place to ensure a healthy food environment. Despite all these laws and policies, food safety is just an orphaned element of the Food and Drugs Act of 1964 (See figure 1).

The Food and Drugs Act (1964) has remained silent on the food element. The act is the primary law that governs food safety in Uganda. However, our findings indicate that the Government of Uganda transformed the drug element into the Drug Act under the National Drug Authority (NDA) to regulate drugs. Unfortunately, the food element of the Food and Drug Act is not active, leaving the food element an orphan that the food industry actors exploit with

several unsafe, processed foods. Moreover, the Food Act has not been amended to account for technological changes and food safety issues. In addition, only the Public Health Act, 1935 address elements of food safety, however this is limited to only meat and milk.

Food labelling is emphasised in the law, but not all ingredients and foodstuffs in the market are labelled. The Food and Drugs Act, CAP 278 regulatory measures on food labelling require ingredient lists and nutrient declarations of packaged foods in line with Codex recommendations. In line with this, the UNBS has put in place Standards for Nutrient labelling requirements for foods and weights and measures (sale and labelling of goods) Rules, 2020, which are in line with Codex Alimentarius standards. UNBS also adopted the East Africa Standards Nutrition labelling requirements. The National Standardisation Strategy (2019–2022) has general rules for labelling. All these standards aim to promote food safety by prohibiting the display/sale of foods with false labels. However, there are still several foodstuffs and ingredients without such labels. In addition, the labels are not simplified and are challenging for the majority population to understand.

Chemical substances of health concern still end up in food due to the use of poor equipment. The Food and Drugs Act, CAP 278, prohibits adding harmful substances to food sold for human consumption. However, because of poor equipment and the tear and wear of machines used in processing food, such substances end up in flour (Posho and millet flour) and grounded nuts, compromising food safety. This leaves the food environment, especially food safety, prone to contamination. More so, the continental Aflatoxin Control Action Plan (ACAP) ensures food safety through the control of aflatoxins and chemical substances such as arsenic, cadmium, and mercury; pesticides; insecticides; and residues of disinfectants and veterinary drugs in the food chain, has not yet been fully implemented because of the inadequacy of funds.

Regulation of food has been tried in areas of fortification with little success. Fortification is intended to improve the nutritional quality of the food supply and provide a public health benefit with minimal health risks. The Food and Drugs (Food Fortification) Regulations, 2005, and the Food and Drug (Food Fortification) (Amendment) Regulations, 2011 (No.53) are the guiding food fortification regulations for wheat flour, maize flour, and edible vegetable fats. The regulations stipulate that “all foodstuffs in Uganda shall be fortified in accordance with national standards”. Additionally, salt fortification with iodine is mandatory. While salt fortification with iodine is mandatory, some salt on the market has low levels of iodine, below the minimum requirements per the standard (SPRING, 2018)⁵. A report on maize fortification indicates that only 4 out of 28 maize millers were fortifying maize flour in 2017 (SPRING, 2018)⁶.

School canteens are still selling processed foods and beverages in the availability of the 2008 draft School Health Policy 2008.

The Policy intends to promote food safety in schools and other child settings, such as areas surrounding schools, Early Childhood Development centres, canteens, food events, and fundraising. It also supports the delivery of nutritious and appealing meals, promoting better nutrition and feeding practices in educational institutions, although these lack specific standards. The lack of standards raises a challenge of implementing why we still find (fast foods, processed foods, and juices, including carbonated drinks) sold in school canteens.

Policy guidelines on Infant and Young Child feeding (IYCF) have registered some success.

It also promoted food safety by restricting the marketing of unsafe foods and breast milk substitutes. The existence of IYCF is to regulate the marketing of infant and young child foods. It also ensures that all infant formula labels do not discourage breastfeeding or the use of human milk nor advertise

breast milk substitutes. These guidelines have primarily been implemented.

Adherence to existing standards is still an enormous challenge.

Several standards are in place, such as UNBS Standards # US CAC/RCP 39:1993 code, which lays out hygienic food practices in mass catering deals. It also clearly states the hygienic requirements for foods intended to feed large groups of people. In addition, the Public Health Act empowers the Ministry of Health (MoH) to make rules and policies for licensing, regulation, and inspection of eating houses and the preparation and sale of food by hawkers. The Local Government Market Ordinance encourages market administrator(s) to maintain adequate market facilities to protect the public's health and safety. For example, "A person handling fresh food for sale shall not permit any part of the fresh food to come into contact with the ground"; "livestock shall not be allowed in a market except in designated places". However, there is very little adherence to these standards due to limited inspections by the authorities.

Figure 1: Uganda's Food Policy Environment



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Conclusion and Policy Recommendations

Uganda has clear frameworks and guidelines for promoting a healthy food environment. However, the discussion in this brief indicates that there are still gaps. The poor/ lack of implementation of the existing policies and regulatory measures is evident. The absence of an authority to handle the food component of the Food and Drug act of 1964 is a major challenge to achieving a healthy food environment that promotes the consumption of safe and nutritious foods.

Considering these challenges, we recommend the following actions.

1. **Establish an independent Food Authority.** There is an urgent need to establish an independent Food Authority which will have exclusive overall responsibility for ensuring a healthy food environment and that food consumed by the citizen is safe and nutritious
2. **Review the food Act of 1964.** Considering the changes in technology and rising food challenges, we recommend the immediate review of the food act to reflect changes in technology and the food environment
3. **Restore hygiene and sanitary inspection system** to ensure adherence to the existing regulatory measures for food and food products, including street food vending establishments, traditional food markets, primary food production centres and food processors, and household hygiene and sanitation.


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