

Policy Brief

Background

Uganda faces a growing burden of non-communicable diseases (NCDs), which account for 35% of all deaths and 40% of the national disease burden. A significant driver of this crisis is the consumption of unhealthy foods, exacerbated by weak regulatory frameworks and low public awareness. The World Health Organization (WHO) and the UN Special Rapporteur on the Right to Health have urged governments to adopt Front-of-Pack Warning Labels (FOPWL) and stricter regulations to curb the marketing of ultra-processed foods (UPFs), particularly to children.

Despite WHO's development of the AFRO Nutrient Profiling Model (NPM) in 2019—a tool to classify foods based on excessive sugar, sodium, and fat content—Uganda lacks a mandatory FOPWL system. Evidence from Chile, Mexico, and Uruguay shows that such policies reduce purchases of unhealthy foods, encourage product reformulation, and improve public health outcomes.

PURPOSE OF THIS POLICY BRIEF

This brief provides evidence-based recommendations for Uganda's Ministry of Health (MoH), Uganda National Bureau of Standards (UNBS), and Ministry of Agriculture (MAAIF) to:

1. Adopt and adapt the WHO AFRO NPM with modifications for clarity and effectiveness.
2. Implement mandatory FOPWL to empower consumers and reduce NCD risks.
3. Integrate these measures into broader food policies (e.g., marketing restrictions, school feeding programmes)

**HIGH IN
SUGAR**

**HIGH IN
SATURATED
FATS**

**HIGH IN
TRANS
FATS**

**HIGH IN
SODIUM**



EVIDENCE-BASED POLICY SOLUTIONS

1. Nutrient Profiling Model (NPM)

An NPM is a science-based tool to classify foods as “healthy” or “unhealthy” based on thresholds for nutrients of concern (sugar, sodium, fats, trans fats). Uganda’s simplest pathway is adopting the WHO AFRO Nutrient Profiling Model (NPM), but with critical improvements:

Key Modifications to WHO AFRO NPM

Nutrient	Threshold for Solids	Threshold for Liquids
Sodium	≥1 mg/kcal or ≥300 mg/100g	≥1 mg/kcal or 40 mg/100ml
Free Sugars	≥10% total energy	≥5% total energy
Total Fat	≥30% total energy	≥30% total energy
Saturated Fat	≥10% total energy	≥10% total energy
Trans Fat	≥1% total energy	≥1% total energy
Non-Sugar Sweeteners (NSS)	Any amount (new addition)	Any amount (new addition)
Caffeine	Any amount (new addition)	Any amount (new addition)

Rationale for Modifications

- **Simplification:** Reduce categories to solids/liquids only (avoiding industry exploitation of complex categories).
- **Inclusivity:** Add Non-Sugar Sweeteners (NSS) and caffeine due to links to diabetes and cardiovascular diseases (WHO, 2023).
- **Alignment with Global Best Practices:** Mirror successful models in Mexico and Argentina, which use dual sodium thresholds.

CASE STUDY: CHILE’S NPM SUCCESS

Chile’s 2016 NPM and FOPWL policy led to:

- 24% decline in sugary drink purchases.
- 37% reduction in breakfast cereal sugar content due to reformulation.
- Improved consumer awareness, especially among mothers and children.

2. Front-of-Pack Warning Labelling (FOPWL)

FOPWL is the most effective labelling system to inform consumers, with three core principles:

1. **Mandatory:** Apply to all packaged foods.
2. **Interpretive:** Use clear warnings (e.g., “HIGH IN SUGAR”).
3. **Visually Striking:** Black octagonal labels (proven most attention-grabbing).

Impact of FOPWL: Evidence from Global Implementations

Country	Policy Impact
Chile	20% drop in UPF purchases; 25% reformulation of products to reduce sugar/sodium.
Mexico	12% decline in sugary beverage sales within 2 years.
Uruguay	Children 30% less likely to choose snacks with warning labels vs. traffic lights.

STAKEHOLDER INPUT: UGANDA'S READINESS

- **MoH:** Supports FOPWL but cites need for industry-proof design (e.g., banning health claims near warnings).
- **UNBS:** Recommends staggered implementation to ease compliance for SMEs.
- **Civil Society:** Advocates for no industry involvement in policy design to avoid dilution.

RECOMMENDATIONS

For the Ministry of Health (MoH)

1. Adopt the Modified WHO AFRO NPM with:

- Two categories (solids/liquids).
- Inclusion of NSS and caffeine.

2. Fast-Track FOPWL Regulations:

- Mandate black octagonal labels for high-in products.
- Ban misleading marketing (e.g., “fortified” claims on unhealthy foods).

3. Expand Food Policies:

- Restrict UPF marketing to children.
- Integrate NPM into school feeding programmes.

For Uganda National Bureau of Standards (UNBS)

1. Develop FOPWL Standards by 2026, ensuring:

- Labels cover $\geq 10\%$ of packaging.
- Symbols accompany text (e.g., “HIGH IN SUGAR” + exclamation mark).

2. Enforce Compliance:

- Penalties for non-compliance (e.g., fines, product recalls).
- Independent monitoring to prevent industry interference.

For Ministry of Agriculture (MAAIF)

1. Legislate NPM/FOPWL in the Food and Nutrition Bill.
2. Promote Local Agroecology: Incentivise farmers to grow nutrient-dense crops (e.g., millet, beans).

CONCLUSION

Uganda's NCD crisis requires urgent action. Adopting a robust NPM and mandatory FOPWL can reduce diet-related diseases by 20–30%, save healthcare costs (as seen in Chile's \$500 million annual savings), and empower healthier consumer choices. The MoH, UNBS, and MAAIF must collaborate to finalise policies by 2026, with civil society oversight to safeguard public interest.

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