

**PRESSURE AND OPPOSITION FROM THE FOOD AND  
BEVERAGE INDUSTRY TOWARDS FRONT-OF-THE-PACK  
WARNING LABELLING REGULATIONS IN UGANDA**



**A SITUATIONAL ANALYSIS  
REPORT**

PUBLISHED MAY 2025

**CEFR****HT**







<b>ACRONYMS AND ABBREVIATIONS</b>	<b>4</b>
<b>LIST OF FIGURES</b>	<b>4</b>
<b>ACKNOWLEDGMENT</b>	<b>5</b>
<b>INSTITUTIONAL PROFILES</b>	<b>6</b>
<b>CHAPTER ONE: INTRODUCTION</b>	<b>8</b>
<i>1.1 About the Situation Analysis</i>	<i>8</i>
<i>1.2 Background and Context</i>	<i>8</i>
<i>1.3 Objectives of the Situational Analysis</i>	<i>9</i>
<i>1.4 Rationale for the Situational Analysis</i>	<i>9</i>
<i>1.4.1 Consequences of Unhealthy Diets</i>	<i>9</i>
<i>1.4.2 Policy Lacuna</i>	<i>9</i>
<i>1.5 Approach Used</i>	<i>10</i>
<i>1.5.1 Design and Data Collection</i>	<i>10</i>
<i>1.5.2 Stakeholder Identification and Mapping</i>	<i>11</i>
<i>1.5.3 Power Cube Analysis</i>	<i>11</i>
<b>CHAPTER TWO: POLICY AND LEGAL FRAMEWORKS</b>	<b>12</b>
<i>2.1 History of Warning Labels on Product Packages</i>	<i>12</i>
<i>2.2 Global Framework</i>	<i>13</i>
<i>2.3 National Instruments</i>	<i>13</i>



# CONTENTS

2.4 Adequacy of Standards and Compliance to Commitments	13
2.5 Constraints in the Adoption of the Nutrient Profile Model	15
<b>CHAPTER THREE: UGANDA FOOD AND BEVERAGE PLAYERS AND FORMS OF FOOD INDUSTRY INTERFERENCE</b>	<b>15</b>
3.1 Characteristics of Food and Beverage Industry Players	15
3.2 Forms of Food and beverage Industry Interference in Uganda	16
3.2.1 Formation of Associations and Lobby Groups	16
3.2.2 Power Dynamics Among Food and Beverage Actors	17
3.2.3 Silencing Critics	18
3.2.4 Spaces of Participation in public health policy formulation	18
<b>CHAPTER FOUR: MEASURES TO PROMOTE HEALTHY DIETS</b>	<b>19</b>
4.1 Coalition building and Partnerships	19
4.2 Strengthening Governance and Transparency in public health policy formulation	19
4.3 Evidence-based Information Systems and Coordination	20
4.4 Awareness and Advocacy	20
<b>CHAPTER FIVE: CONCLUSIONS AND RECOMMENDATIONS</b>	<b>21</b>
5.1 Conclusions	21
5.2 Recommendations	22
<b>Annex 1:</b> Observation Checklist	22
<b>Annex 2:</b> Power Cube Analysis	22

## ACRONYMS AND ABBREVIATIONS

CEFROHT	Center for Food and Adequate Living Rights
CONSENT	Global Consumer Center
CPA	Corporate Political Activity
CSR	Corporate Social Responsibility
FAO	Food and Agriculture Organization
FIAN	Food First Action Network
FOPWL	Front-of-the Pack Warning Labelling
NPM	Nutrient Profile Model
PSF	Private Sector Foundation
SEATINI	Southern and Eastern Africa Trade Information and Negotiations Institute
SSB	Sugar Sweetened Beverages
UMA	Uganda Manufacturers' Association
UNBS	Uganda National Bureau of Standards
UNCC-FOPWL	Uganda National CSO Coalition on Front-of-the Pack Warning Labelling
WHO	World Health Organization

## LIST OF FIGURES

<b>Figure 1:</b> CEFROHT head Office in Uganda	vi
<b>Figure 2:</b> FIAN launches the Right to food and Nutrition Manual	vi
<b>Figure 3:</b> Overall rating of Nutritional Labelling in Uganda	9
<b>Figure 4:</b> Rating of compliance to standards by the Food and Beverage Industry	9
<b>Figure 5:</b> Commitment to consumer health and nutrition	10
<b>Figure 6:</b> Factors delaying the adoption of the NPM and FOPWL regulations in Uganda	11
<b>Figure 7:</b> Most desired action to counter CSR and promote healthy food choices and nutrition	20
<b>LIST OF TABLES</b>	
Table 1: Categories of food and beverage industry actors	9

## ACKNOWLEDGMENT

This study was made possible by the technical and financial assistance provided by the Global Healthy Advocacy Incubator (GHAi) and its implementing partners; FIAN-Uganda, the Centre for Food and Adequate Living Rights (CEFROHT) and other partners, SEATINI and CONSENT, through their coalition, the Uganda National CSO Coalition for Front of the Pack Warning Labeling (UNCC-FOPWL)

Special thanks and appreciation go to the stakeholders from the relevant government institutions, the food and beverage industry, food and nutrition experts, members of civil society and other members of the public who provided valuable inputs, contributions, and insights that shaped the findings and recommendations presented in this report.

The lead consultant Dr. Rukundo Peter Milton and his assistant Dr. Munirah Mbabazi are appreciated for their invaluable technical contribution and guidance.

We hope that this report provides valuable insights and recommendations that will support the Government of Uganda and other relevant stakeholders in advancing the Nutrient Profile Model (NPM) and the Front of the Pack Warning Labelling (FOPWL) regulations in Uganda.



**FIAN**  
UGANDA

### Copyright

This report was developed by FIAN Uganda in collaboration with the Centre for Food and Adequate Living Rights (CEFROHT).

### Recommended citation:

FIAN and CEFROHT (2025).

Pressure and opposition from the food and beverage industry towards Front of the Pack Warning Labels in Uganda – a Situational Analysis Report. Kampala: Foodfirst Information and Action Network, Uganda.





Obove is the CEFROHT head

Her Worship Flavia Nassuna Matovu, representing the Chief Justice, launches the new CEFROHT office. This milestone was achieved with support from the International Development Law Organization (IDLO) and the Food

## INSTITUTIONAL PROFILES

### The Centre for Food and Adequate Living Rights (CEFROHT)

The Centre for Food and Adequate Living Rights (CEFROHT), is a human rights not-for-profit organisation whose mission is to promote social justice in food, agriculture, investment and trade systems, through its three integrated programs: social justice and strategic litigation, Community empowerment, Legal and policy advocacy to advance the right to adequate living for everyone in the world.



**FIGURE 2: FIAN launches the Right to food and Nutrition Manual**

### **FIAN Uganda**

FIAN (Food First Action Network) Uganda is a registered Non-Governmental Organisation whose aim is to support all people across the globe in their struggles to end hunger and malnutrition through the promotion of Human Rights, especially the Right to Adequate Food and Nutrition for persons or groups of people threatened by hunger and malnutrition in Uganda. FIAN-Uganda supports communities in standing up against unfair and oppressive programs and policies that may hinder them from adequately feeding themselves.

### **Uganda National CSO Coalition for Front-of-Pack Warning Labelling**

FIAN Uganda envisions a country that upholds the Right to Adequate Food and Nutrition. FIAN-Uganda, in partnership with the Centre for Food and Adequate Living Rights (CEFROHT) and other partners, SEATINI and CONSENT work through a coalition; the Uganda National CSO Coalition for Front of the Pack Warning Labelling (UNCC-FOPWL). The coalition is implementing a project dubbed “Towards an effective regulatory framework for Front-of-package warning labelling and restriction of marketing of unhealthy diets and SSBs in Uganda” to promote FOPWL regulations in Uganda and begin ground softening efforts for a comprehensive food policy framework in Uganda by September 2025.

Among its objectives, the project aims to advocate for Front-of-Package Warning Labelling (FOPWL) regulations that ensure accurate, easily understandable, transparent, and comprehensible information on food and beverage products in Uganda. This will be pursued through a coalition movement and a human rights-based approach. A key strategy to achieve this goal is to monitor and counter the undue influence and pressure exerted by the food industry in formulation of public health policies such as the NPM and FOPWL in Uganda.



## CHAPTER ONE: INTRODUCTION

### 1.1 About the Situation Analysis

This situational analysis investigated the Corporate Political Activity (CPA) of the key players in the food and beverage industry particularly around the formulation of Uganda's Nutrient Profile Model (NPM) and Front-Of-the Pack Warning Labelling (FOPWL) regulations. It further aimed at supporting the UNCC-FOPWL and other stakeholders to develop counter measures to redress any imbalances of interests in the development of the NPM and adoption of the FOPWL regulations in Uganda.

The analysis was supported by FIAN-Uganda, in partnership with CEFROHT and other partners in the Uganda National CSO Coalition for Front of the Pack Warning Labelling (UNCC-FOPWL). This partnership aims to promote FOPWL regulations in Uganda and begin ground-softening efforts for a comprehensive food policy framework.

### 1.2 Background and Context

The nutrition transition towards unhealthy food is responsible for serious risks to consumers and public health. The levels of salt, fat, sugar, and energy density in the diets are increasing and fuel an increase in prevalence, mortality, and burgeoning health costs associated with surging overweight, obesity and diet-related non-communicable diseases, notably diabetes, cardiovascular diseases (CVD) and Cancer<sup>1</sup>. Already, up to 33% of annual deaths are attributed to Diet-Related Non-Communicable Diseases (DRNCDs), with an age-standardised mortality rate of 709 per 100,000 in males and 506 in females<sup>2</sup>.

In Uganda, between 2016 and 2022, overweight increased from 24.2% to 27.2%, while obesity increased from 8.3% to 9.9%<sup>3</sup>. Moreover, 33% of annual deaths are attributed to DRNCDs, notably cardiovascular diseases, Cancer, and Diabetes, among others<sup>4</sup>. The burden of foodborne diseases is also a challenge affecting over 1.3 million people, constituting 14% of all cases treated annually<sup>5</sup>. Unsafe food takes a toll on the economy by limiting trade opportunities, hence slowing progress on critical national development programmes, especially agro-industrialisation and human capital development.

These alarming trends underscore the urgent need for strong nutrition policies and regulatory frameworks such as the NPM and FOPWL to safeguard public health and protect consumers from harmful dietary exposures. However, policy formulation in this area is often met with significant resistance from sections of the food and beverage industry, which deploy tactics to delay, weaken, or oppose effective regulation. Against this backdrop, this situational analysis identifies key industry players, their opposition tactics, and provides counter-measures and narratives for public health advocates to redress imbalanced interests in the development of Uganda's NPM and FOPWL regulations.

---

1 Fanzo, J., Rudie, C., Sigman, I., Grinspoon, S., Benton, T. G., Brown, M. E., ... & Willett, W. C. (2022). *Sustainable food systems and nutrition in the 21st century: A report from the 22nd annual Harvard Nutrition Obesity Symposium*. *The American Journal of Clinical Nutrition*, 115(1), 18-33.

2 WHO (2023). *Country disease outlook – Uganda*. Geneva: World Health Organisation Africa Regional Office.

3 Uganda Bureau of Statistics (UBOS) (2024). *Uganda Demographic and Health Survey 2022 Preliminary Results*. Kampala. UBOS.

4 WHO. (2018). *Non-communicable diseases country profile – Uganda*. Geneva: World Health Organisation.

5 FAO (2022). *It is not food if it is not safe: Advocating for food safety and quality assurance to improve Uganda's economy and people's health*. Policy brief. Kampala: Food and Agriculture Organization of the United Nations.



### I.3 Objectives of the Situational Analysis

The objectives of the situational analysis were to:

- (i) Identify and map out key food and beverage industry players that have undue influence on formulation of public health policies in Uganda.
- (ii) Assess the gaps and constraints delaying the adoption of the NPM and FOPWL in Uganda.
- (iii) Identify forms of food industry interference adopted by the food and beverage industry towards a favourable policy and legal environment.
- (iv) Develop countermeasures to redress imbalanced interests in the formulation processes of Uganda's NPM and FOPWL regulations.

### I.4 Rationale for the Situational Analysis

#### I.4.1 Consequences of Unhealthy Diets

The proliferation of unhealthy diets poses significant risks to public health, economic stability, and social well-being. As dietary patterns shift towards increased consumption of processed and ultra-processed foods high in sugar, salt and unhealthy fat, the implications for non-communicable diseases (NCDs) and overall health outcomes become increasingly concerning.

The World Health Organisation (WHO) identifies unhealthy diets as a significant contributor to the global burden of NCDs, which are responsible for a substantial number of deaths. Studies have shown that the rising consumption of high-calorie, low-nutrient foods is linked to an increase in NCDs in Uganda<sup>6</sup>. By 2019, NCDs accounted for 33% of all adult fatalities in the country, with the probability of dying prematurely from one of the four main NCDs being 22%<sup>7</sup>. They pose an economic burden, diverting resources away from other essential services<sup>8</sup>.

#### I.4.2 Policy Lacuna

Policy limitation is a constraining factor delaying progress on NCD mitigation. Currently, there is no Nutrient Profile Model to inform policy decisions towards Front of the Pack Warning Labelling (FOPWL) regulations and other complementary policies and standards in Uganda.

The absence of a comprehensive regulatory framework leads to the proliferation of unhealthy food products in the market, as producers often prioritise profit over safety and quality<sup>9</sup>. Moreover, consumer awareness regarding healthy diets and food safety is critically low; most consumers lack the knowledge necessary to make informed dietary choices.

The formulation and implementation of evidence-based public health regulatory frameworks such as the NPM and FOPWL that are free from food industry interference are critical steps towards addressing the growing burden of diet-related NCDs in Uganda. FOPWL policies guide healthier food choices, curb the consumption of processed and ultra-processed food products and protect consumers from misleading marketing and nutrition information.

---

<sup>6</sup> Nakaganda, A., Mbarusha, I., Spencer, A., Patterson, L., Gemmell, I., Jones, A., & Verma, A. (2023). Prevalence, trends and distribution of lifestyle cancer risk factors in Uganda: a 20-year systematic review. *BMC cancer*, 23(1), 311.

<sup>7</sup> WHO (2024). *Non-communicable Diseases (NCD) Country profiles*. Geneva: World Health Organisation.

<sup>8</sup> Ndejjo, R., Masengere, P., Bulafu, D., Namakula, L. N., Wanyenze, R. K., Musoke, D., & Musinguzi, G. (2023). Drivers of cardiovascular disease risk factors in slums in Kampala, Uganda: a qualitative study. *Global Health Action*, 16(1), 2159126.

<sup>9</sup> Jeffer, S., Kassem, I., Kharroubi, S., & Abebe, G. (2021). Analysis of food safety management systems in the beef meat processing and distribution chain in Uganda. *Foods*, 10(10). doi.org/10.3390/foods10102244.

However, global and regional evidence increasingly shows that the food and beverage industry actors often engage in Corporate Political Activity (CPA) to influence, delay, dilute, or block public health policies and regulations that may affect their commercial interests<sup>10</sup>. CPA may take several forms, including lobbying, shaping evidence and narratives, fostering alliances with policymakers, engaging in legal threats, or framing regulations as harmful to economic growth, trade, or consumer choice.<sup>11</sup> Such activities can compromise the integrity and public health orientation of policy-making processes, leading to imbalances of interests in which corporate priorities outweigh the public health agenda.

In Uganda, while the processes to develop the NPM and FOPWL are underway, there is limited empirical documentation of how the key food industry players are positioning themselves within these debates, the strategies being employed, and the extent of their influence on policy direction. Without such evidence, policymakers, civil society, and public health advocates are less equipped to anticipate, counter, or neutralize industry interference that undermines public health.

Therefore, a situational study to investigate the corporate political activity of key players in the food and beverage industry around the NPM and FOPWL processes will expose patterns and strategies used by corporate actors to influence public health policy formulation; strengthen advocacy and transparency by providing evidence-based counterarguments to misleading economic or technical claims and; support the development of preventative and corrective mechanisms, and build stronger civil society engagement in policy dialogues.

Ultimately, this study will contribute to safeguarding the NPM and FOPWL formulation processes from undue corporate influence, ensuring that public health priorities are upheld over profits. It will also position the UNCC-FOPWL as credible watchdogs and advocates for the right to adequate food, transparency in governance, and the promotion of public health policies that protect all citizens from harmful industry practices and their long-term public health consequences.

## **1.5 Approach Used**

### **1.5.1 Design and Data Collection**

A rapid cross-sectional and descriptive assessment was undertaken employing a mixed methods approach. The literature review focused on existing national and regional policy frameworks, as well as global instruments and commitments. Key informants were reached through purposive and snowball sampling techniques. Key informant interviews were held with whistle-blowers and former industry employees, policy makers, researchers, CSOs, Agroprocessing & Nutrition Service Business and academia to gather deeper insights into food industry interference towards food policy formulation in Uganda. To further understand the influences of the food industry actors on the population, an online tool was designed and completed by 84 respondents. Respondents were policy makers, and government technocrats, CSOs, Agroprocessing & Nutrition Service Business and academia who have been part of public health policy formulation in Uganda.

---

10 Gomes, F. S., et al. (2023). *The corporate political activity of the food industry: A systematic review*. *Frontiers in Public Health*, 11:982908

11 Mialon, M., & da Silva Gomes, F. (2019). *Public health and the ultra-processed food and drink products industry: Corporate political activity of major transnationals in Latin America and the Caribbean*. *Public Health Nutrition*, 22(11), 1898–1908



## I.5.2 Stakeholder Identification and Mapping

Key stakeholders were identified and engaged to facilitate an in-depth understanding of the power dynamics within the food and beverage industry.

Stakeholders included government agencies, health journalists, whistle-blowers, academia, researchers and CSOs. Engaging with these stakeholders provided insights into roles, interests, and influence of the food industry on public health policy formulation.

This step involved conducting stakeholder mapping to visualise the relationships and power structures within the food and beverage industry. This facilitative approach adopted a workshop design and facilitated the building of consensus on countermeasures to be adopted<sup>12</sup>.

## I.5.3 Power Cube Analysis

This framework is a valuable analytical tool for understanding the dynamics of power and decision-making processes within specific contexts. In the case of Uganda's food and beverage industry, the Power Cube analysis facilitated the identification of the factors influencing policy outcomes around healthy food options.<sup>13</sup> It consisted of three dimensions: levels of power, forms of power, and spaces for participation. Each dimension analysed enabled an understanding of the dynamics of food industry influential actions against policy and regulatory processes promoting healthy foods.

### a) Levels of Power

Assess the different levels of power within the food and beverage industry, including local, national, and international actors. This analysis helped identify who holds decision-making power and the approaches adopted by the food and beverage industry in shaping efforts towards a favourable policy and legal environment<sup>14</sup>.

### b) Forms of Power

This examined the various forms of power at play, such as economic power; the influence of large food corporations, political power, government policies and regulations, social power, cultural norms and consumer preferences. Understanding these forms of power provided insights into the barriers and facilitators in formulating food policies that promote healthy food<sup>15</sup>.

Emphasis was placed on understanding how visible, invisible and hidden power works within the food and beverage industry. This was important in identifying lobbying techniques and within which spaces this happens.

### c) Spaces for Participation

This approach sought to identify the spaces available for stakeholder participation in decision-making processes. It examined the extent to which stakeholders in formal spaces (government consultations) and informal spaces (community discussions) influence decision-making processes.

---

12 cLuo, J., Ji, C., Qiu, C., & Jia, F. (2018). Agri-food supply chain management: bibliometric and content analyses. *Sustainability*, 10(5), 1573. <https://doi.org/10.3390/su10051573>

13 Katsikouli, P., Wilde, A., Dragoni, N., & Høgh-Jensen, H. (2020). On the benefits and challenges of blockchains for managing food supply chains. *Journal of the Science of Food and Agriculture*, 101(6), 2175-2181. <https://doi.org/10.1002/jsfa.10883>

14 See: Luo et al., (2018).

15 See: Katsikouli et al., (2020).

Engaging stakeholders in these spaces can lead to more inclusive and effective strategies for promoting healthy diets<sup>16</sup>. This was critical in understanding how these spaces work and what it would take for buy-in into the proposed interventions.

## CHAPTER TWO: POLICY AND LEGAL FRAMEWORKS

### 2.1 History of Warning Labels on Product Packages

The world's first pack warning "Caution — cigarette smoking may be hazardous to your health, appeared in the United States in 1966.<sup>17</sup> Following consistent warnings from the Surgeon General's report, the Cigarette Labelling Act (1966) required manufacturers to place specific health warning statements on cigarette packages and advertisements. In 1972, the Consumer Product Safety Act established the Consumer Product Safety Commission to oversee the safety of consumer products deemed unsafe, including cigarettes and a broader range of consumer products beyond tobacco products.<sup>18</sup>

In the food and beverage industry, conventional nutrition labelling has been extensively reported to be difficult to interpret by consumers when choosing the foods they eat<sup>19</sup>. For this reason, simplified front-of-pack (FOP) nutrition labels have been proposed as an effective alternative to improve consumers' ability to find and understand nutrition information<sup>20</sup>.

Several countries have adopted FOPNL. In Mexico, warning labels replaced the Guideline Daily Amount (GDA) nutrition.<sup>21</sup> In Chile, directive FOP nutrition labelling targets products with high content of energy, sugar, saturated fat and sodium. As a consequence, consumers have reported having modified their food purchases by selecting products with fewer warnings, while sales of products like chocolate and cookies decreased significantly.<sup>22</sup> Other countries with mandatory FOP nutrition labelling include Brazil, Uruguay, Peru, Argentina, Israel, Canada, Australia, New Zealand and South Africa.<sup>23</sup> Voluntary FOP schemes have also been adopted by Belgium, Croatia, the Czech Republic, Denmark, Finland, France, Germany, Hungary, Iceland, and Ireland<sup>24</sup>

The relationship between the food industry and nutritional guidelines has often been fraught with tension. The rise of lifestyle-related diseases, such as obesity, diabetes and some cancers, has spurred the development of nutrient profiling systems, which classify foods based on their nutritional composition to guide dietary decisions. However, while nutrient profiling systems have utility in regulating health claims, their development has often encountered resistance from the food industry, which seeks to maintain favourable perceptions of its products.

---

16 Andreyeva, T., Middleton, A., Long, M., Luedicke, J., & Schwartz, M. (2011). Food retailer practices, attitudes and beliefs about the supply of healthy foods. *Public Health Nutrition*, 14(6), 1024-1031.

17 Chapman, S., & Carter, S. M. (2003). "Avoid health warnings on all tobacco products for just as long as we can": a history of Australian tobacco industry efforts to avoid, delay and dilute health warnings on cigarettes. *Tobacco control*, 12(suppl 3), iii13-iii22.

18 Egilman, D. (2006). A brief history of warnings. In *Handbook of warnings* (pp. 33-42). CRC Press.

19 Cowburn, G., & Stockley, L. (2005). Consumer understanding and use of nutrition labelling: a systematic review. *Public health nutrition*, 8(1), 21-28.

20 Hawley, K. L., Roberto, C. A., Bragg, M. A., Liu, P. J., Schwartz, M. B., & Brownell, K. D. (2013). The science on front-of-package food labels. *Public health nutrition*, 16(3), 430-439.

21 White, M., & Barquera, S. (2020). Mexico adopts food warning labels, why now? *Health Systems & Reform*, 6(1), e1752063.

22 Ministry of Health. (2015). Decree number 13, of 2015. *Library of the National Congress of Chile*. Ministry of Health.

23 Cabrera, M., Machín, L., Arrúa, A., Antúnez, L., Curutchet, M. R., Giménez, A., & Ares, G. (2017). Nutrition warnings as front-of-pack labels: influence of design features on healthfulness perception and attentional capture. *Public health nutrition*, 20(18), 3360-3371.

24 Pettigrew, S., Jongenelis, M. I., Hercberg, S., & Julia, C. (2023). Front-of-pack nutrition labels: An equitable public health intervention. *European Journal of Clinical Nutrition*, 77(1), 135-137.



This leads to situations in which nutrient profile models can be adjusted to align with industry interests, ultimately facilitating the continued marketing of unhealthy food products<sup>25</sup>.

## 2.2 Global Framework

There has been increasing global interest in FOP nutrition labelling as a policy tool to promote healthy food environments and consumer patterns. The adoption of this approach is currently led without a binding framework for country-level adoption, despite a framework of guiding principles<sup>26</sup>. The global food packaging regime is mostly guided by the Codex Alimentarius Commission (CAC), a joint undertaking of FAO and WHO, which is mandated to guide countries by issuing principles, codes, statements, guiding standards, and limits for safety and quality assurance in food handling and quality control. Whereas the Codex system has not issued specific principles for FOPNL systems, it identifies three types of nutrition labelling: nutrient declarations, nutrition and health claims, and supplementary nutrition information, including FOPNL.

Nutrient declarations are standardised listings of the nutrient content of a food or beverage, usually positioned on the back or side of the package. In 2012, the CAC recommended that nutrient declarations be mandatory on food packages.

The FOPNL approach complements nutrient declarations by providing convenient, relevant and easily understood information on the front of packs.

## 2.3 National Instruments

The Uganda National Bureau of Standards (UNBS), domiciled under the policy leadership of the Ministry of Trade, Industry and Cooperatives (MTIC), is mandated to develop and enforce Standards, including on nutrition labelling. In particular, the US EAS 803:2014 on Nutrition Labelling — Requirements is the main instrument guiding nutrition labelling in Uganda. This Standard specifies requirements for the nutrition labelling of foods and applies to all foods except for foods for special dietary uses.

Other supportive instruments supporting nutrition labelling include:

- (i) 1995 Constitution of the Republic of Uganda.
- (ii) The Public Health Act
- (iii) National Trade Policy 2007.
- (iv) National Health Policy of 2010.
- (v) National Quality and Standards Policy of 2012.
- (vi) National Agriculture Policy of 2013.

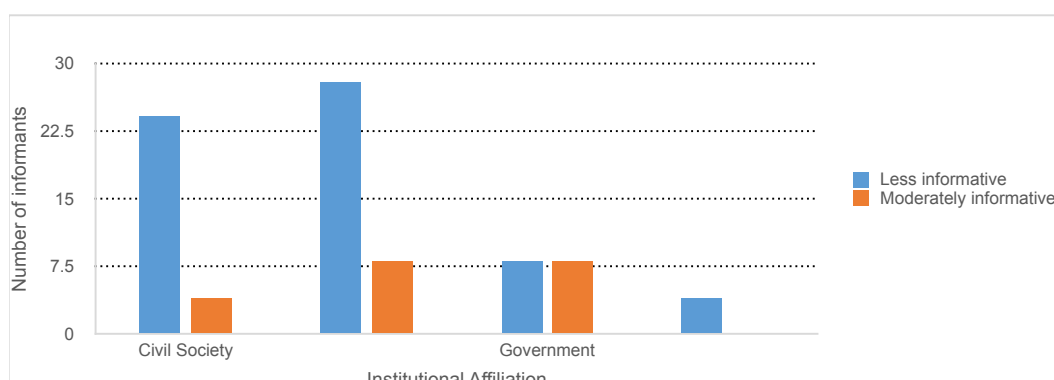
Given the recent developments in food systems thinking and the potential of transformation of food systems and food environments towards inclusive and sustainable development, it is necessary to review, strengthen and align existing policy and legal frameworks to strengthen Uganda's competitive position in advancing healthy food environments, and policy informed consumer decision making and consumer protection approaches.

## 2.4 Adequacy of Standards and Compliance to Commitments

25 Hughes, C., Wellard, L., Lin, J., Suen, K. L., & Chapman, K. (2013). *Regulating health claims on food labels using nutrient profiling: what will the proposed standard mean in the Australian supermarket?* *Public Health Nutrition*, 16(12), 2154-2161.

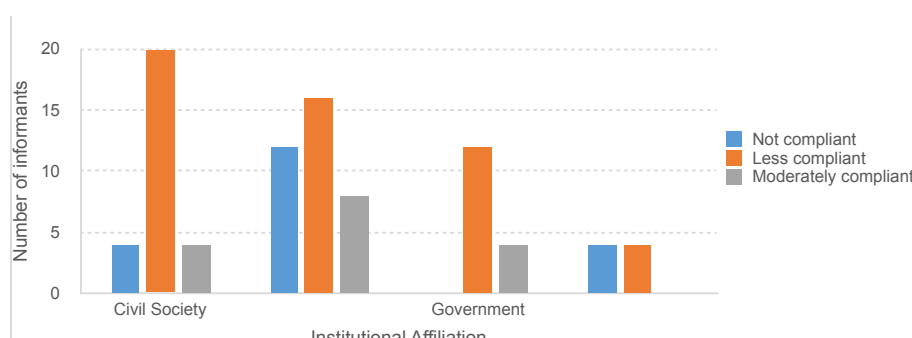
26 WHO (2019). *Guiding principles and framework manual for front-of-pack labelling for promoting healthy diet*. Geneva: World Health Organization.

Uganda has put in place various standards and legal instruments supporting nutritional labelling and consumer safety. However, as shown in Figure 3, most key informants alluded to the fact that the current nutrition labelling regime was less informative and this hindered effective consumer awareness and food choices.



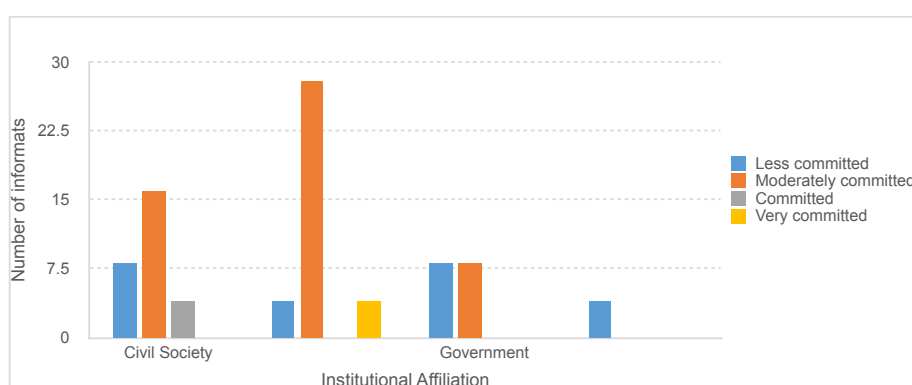
**Figure 3: Overall rating of Nutritional Labelling in Uganda**

On the issue of whether food and beverage industries were compliant with existing standards on nutritional labelling, most key informants reported that industry actors were less compliant in many circumstances, as shown in Figure 4.



**Figure 4: Rating of compliance to standards by the Food and Beverage Industry**

In terms of overall commitment, most respondents reported that the actions of Uganda's food and beverage actors were generally an indication of moderate commitment to consumer health and nutrition, as shown in Figure 5.



**Figure 5: Commitment to consumer health and nutrition**



## 2.5 Constraints in the Adoption of the Nutrient Profile Model

Beyond technical gaps, political economy dynamics remain the most decisive factor influencing the adoption of the NPM in Uganda. The food and beverage industry, whose products are often the target of stricter regulation, has consistently resisted efforts to institutionalise the NPM and FOPWL. This resistance takes different forms, including lobbying policymakers, questioning the scientific basis of the models, amplifying gaps in local evidence, and mobilising trade arguments to frame NPMs as barriers to business growth. Such strategies create delays and dilute the momentum needed to advance nutrition policy reforms.

As shown in Figure 6, the pushback from the food industry was reported as the factor delaying the adoption of the NPM and FOPWL in Uganda.

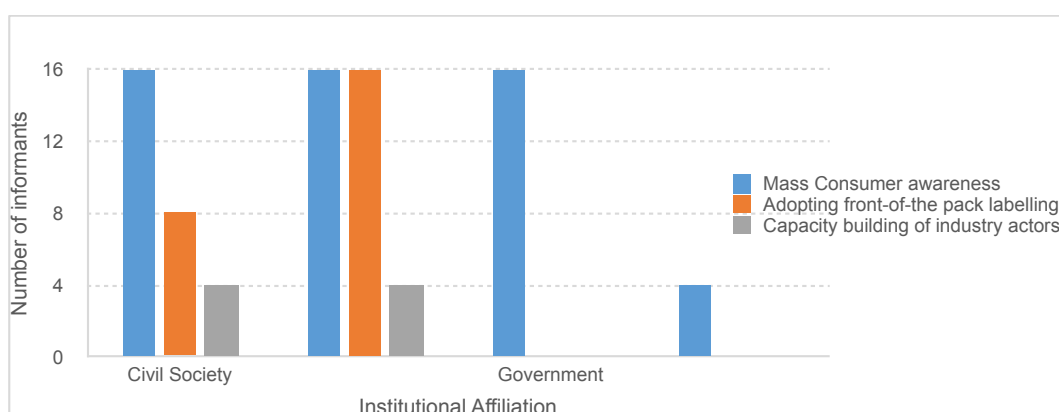


Figure 6: Factors delaying the adoption of the NPM and FOPWL regulations in Uganda

## CHAPTER THREE: UGANDA FOOD AND BEVERAGE PLAYERS AND FORMS OF FOOD INDUSTRY INTERFERENCE

### 3.1 Characteristics of Food and Beverage Industry Players

The food and beverage industry in Uganda is diverse and includes formal and informal actors. The Uganda Micro, Small and Medium Enterprise (MSME) policy of 2015 prescribes the categorisation of enterprises based on the fulfilment of the minimum requirements of two criteria: number of employees, capital investment and annual sales turnover. In quantitative terms, micro-enterprises employ not more than 5 people and have total assets not exceeding Uganda shillings (UgX) 10 million while small enterprises employ between 5-49 people and have total assets between 10 million but not exceeding 100 million. On the other hand, medium enterprises employ 50 to 100 people with assets of more than 100 million, as indicated in Table 1.

Table 1: Categories of food and beverage industry actors

Category	Minimum requirements	Common market segments	Geographical focus	Common food items
<b>Micro enterprises (mostly informal)</b>	Businesses employ not more than 5 and have total assets not exceeding UGX: 10 million	Women, youth, households, community members, and low-income workers	Local community and village businesses, grocery shops,	Deep-fried foods, baked products, and sugar-sweetened beverages
<b>Small enterprises</b>	The enterprise employs between 5 and 49 people and has total assets between UGX: 10 million but not exceeding 100 million	Peri-urban and town dwellers, urban workers	Urban settings, towns and municipalities	Deep-fried, baked, ultra-processed foods, sugar-sweetened beverages, and imported foods
<b>Medium scale</b>	The enterprise employs between 50 and 100 people with total assets of more than 100 million but not exceeding 360 million	Middle-income class, urban dwellers, international workers, tourists, and institutional authorities	Major towns and cities	Deep-fried, baked, ultra-processed foods, sugar-sweetened beverages, imported and genetically modified foods

### 3.2 Forms of Food and beverage Industry Interference in Uganda

#### 3.2.1 Formation of Associations and Lobby Groups

The food and beverage industry in Uganda has increased the formation of associations and lobby groups, some with parastatal status, to be able to build collective resistance against government policies and regulations that might require extra regulation and scrutiny. Some of these associations and groupings have created strong alliances that often secure an audience of high-level officials in state authority, including His Excellency the President of Uganda, to circumvent actions to safeguard consumer health and safety.

A recent example, in 2025, public health advocates, CSOs and the parliament of Uganda proposed to amend the excise duty act, 2025 to increase the Sugar Sweetened Beverage (SSB) tax from 10 per cent to 13 per cent. The Beverage Industry under the Private Sector Foundation (PSF), and Uganda Manufacturers Association (UMA) lobbied the president through a meeting at State House to block the amendment of the act, and they were successful. They highlighted to the president the negative impacts of passing the tax on the beverage industry which included; closure of business and economic melt-down, and the ripple effects to the unemployment the tax will cause

Some of the associations and lobby groups currently in place include, among others:

- (i) Private Sector Foundation Uganda (PSFU).
- (ii) Uganda Manufacturers Association (UMA).
- (iii) Uganda Chamber of Commerce and Industry (UCCI)
- (iv) Hoteliers Association of Uganda.
- (v) Uganda Restaurant Owners Association.
- (vi) The Presidential Economic Council (PEC).
- (vii) Uganda Investors Round-Table.
- (viii) Kampala City Traders Association (KACITA)
- (ix) Uganda CEOs Forum.
- (x) Market Traders and Vendors Association.

### 3.2.2 Power Dynamics Among Food and Beverage Actors

The situational analysis revealed that the food and beverage industry in Uganda is heavily influenced by complex power dynamics among multinational corporations, local producers, government agencies, and civil society organisations. At the global level, a few dominant multinational corporations hold disproportionate control over food production, marketing, and distribution, with their influence extending into national markets such as Uganda.

Findings indicate that these corporations frequently engage in corporate political activity (CPA) to shape public health policies and regulations in ways that safeguard their commercial interests. Evidence from Uganda shows that similar trends exist, with processed food manufacturers and beverage companies employing aggressive marketing, lobbying, and public relations strategies to consolidate their power. These strategies often include reframing public health debates to emphasise voluntary, industry-led initiatives while downplaying the documented health risks associated with their products.

The analysis also observed that some of the key actors in the Ugandan food industry actively participate in high-level policy platforms such as the Presidential Investors' Round Table. Their involvement often centres on advancing investment and profit-making interests, with limited regard for public health considerations. In several cases, industry actors have lobbied against regulatory measures aimed at protecting population health, including restrictions on the marketing of unhealthy foods, the introduction of taxes on sugar-sweetened beverages, and the establishment of front-of-pack nutrition labelling standards. Their economic weight and political connections enable them to resist regulations, dominate consumer markets, and marginalise healthier local alternatives.

This form of power not only undermines public health objectives but also perpetuates structural inequalities within Uganda's food system, leaving public health advocates at a considerable disadvantage in advancing nutrition-sensitive policies and interventions aimed at curbing the burden of NCDs.

**As one of the respondents put it,**

**“** *Our push for more taxes on sugar and sweetened beverages has not picked up in part due to resistance and influence of big industries that influence Parliament, finance officials and the President.*



### 3.2.3 Silencing Critics

In Uganda, Civil society organisations, public health advocates, lawyers and academia are at the forefront of promoting nutrition education and advocating for policies that support local food systems, but their influence is often limited by the substantial financial resources and political connections of multinational corporations. Big players in the food and beverage industry often use a tactic of silencing key critics in civil society, academia and the legal fraternity.

**Whereas this analysis did not establish significant leads on this matter, one respondent alluded to this problem:**

*“The big lawyers, academia and established civil society organisations are silent on critiquing food and beverage industry actors due to fear of reprisals and conflict of interest...even standards enforcement officers have been sometimes bribed and compromised not to regulate unhealthy products”.*

Whereas building coalitions among civil society, academia, and advocates have enhanced their collective power to effect change in food systems, some big food industry players always push back by compromising the loud voices. These actors often advocate for healthier food environments, raise awareness about the impacts of unhealthy diets, and push for policy changes that prioritise public health. However, they frequently encounter resistance from well-resourced food industry actors who seek to maintain the status quo.

### 3.2.4 Spaces of Participation in public health policy formulation

The situational analysis found that public health policy formulation in Uganda typically involves a wide range of stakeholders, including government ministries, departments and agencies, civil society organisations, academia, development partners, and increasingly, private sector actors. These participatory spaces are designed to encourage inclusivity and transparency, yet they are also arenas where power struggles emerge, particularly between public health advocates and food industry representatives.

The formulation of the Uganda NPM provided a clear example of how these dynamics play out. Throughout the multiple stakeholder consultations and technical working group meetings convened by the Ministry of Health, food industry actors were consistently present. Representatives, particularly from the Scaling Up Nutrition (SUN) Business Network, actively participated in the discussions. During these engagements, industry actors strongly emphasised the need for continuous consultation with the private sector, arguing that the food industry must be engaged at every stage of the policy design and implementation process.

While framed as a contribution to inclusivity, such participation reflects the growing influence of corporate actors in public health policy spaces. Their presence allows them to closely monitor the process, advocate for positions that protect their commercial interests, and sometimes dilute or delay public health measures. For example, industry representatives in the NPM process recommended approaches that placed greater responsibility on consumer education and voluntary commitments rather than on binding regulatory measures.

Civil society and public health advocates expressed concern that such influence risks shifting the balance of the process away from evidence-based, health-oriented outcomes toward compromises that favour industry priorities. These dynamics illustrate how spaces intended for multi-stakeholder participation can also become avenues for corporate political activity, where industry actors seek legitimacy and leverage to shape the policy environment.

## CHAPTER FOUR: COUNTER MEASURES TO PROMOTE HEALTHY DIETS

### 4.1 Coalition building and Partnerships

Coalition building and strategic partnerships are critical countermeasures to food industry interference in public health policy and nutrition advocacy. By bringing together diverse actors, coalitions can leverage collective strengths, resist corporate influence, and create a more supportive environment for advancing healthy diets.

They amplify the voices of civil society, academia, public health advocates, and community groups, ensuring that public health interests are not overshadowed by the financial and political power of multinational food and beverage corporations. Unlike isolated efforts, coalitions enable resource pooling, shared expertise, and coordinated strategies that increase resilience against industry lobbying, framing tactics, and regulatory capture.

Experiences from the UNCC-FOPWL and other multisectoral collaborations in Uganda demonstrate that coalitions can successfully drive improvements in nutrition outcomes.

Building broad-based coalitions that include government agencies, NGOs, academia, health professionals, and consumer groups creates a counterweight to industry-dominated platforms. These alliances can jointly advocate for strong, evidence-based policies, such as taxes on sugar-sweetened beverages, restrictions on unhealthy food marketing, and the implementation of clear front-of-pack nutrition labelling.

**As one public health advocate noted during the analysis:**

*“When we stand alone, industry silences us easily. But when we speak as a coalition, policymakers cannot ignore us.”*

Overall, coalition building strengthens accountability, limits the ability of industry actors to dominate policy spaces, and ensures that nutrition remains at the centre of the public health agenda. By uniting diverse stakeholders under a shared goal of protecting public health, these alliances serve as an effective shield against food industry interference and a driving force for policy change.

### 4.2 Strengthening Governance and Transparency in public health policy formulation

Strengthening governance structures and promoting transparency in food policy development emerged as a critical countermeasure to food industry interference in Uganda. The analysis revealed that while policy frameworks exist, their effectiveness is frequently undermined by gaps in accountability, weak enforcement, and the unchecked influence of powerful food and beverage corporations.

By embedding strong conflict of interest safeguards into policymaking processes, Uganda can limit the ability of multinational corporations and local industry actors to dilute or delay policy reforms. Clear rules on disclosure, restrictions on industry participation in public health policy spaces, and transparent records of stakeholder engagement would help ensure that policy decisions are guided by public health evidence rather than commercial interests.

**As one civil society respondent emphasised during the survey:**

**“** *Transparency is our strongest shield. When decisions are made openly, it becomes much harder for industry to twist the process in their favour.”*

Overall, strengthening governance and transparency not only reduces the influence of vested interests but also enhances accountability, builds trust in institutions, and ensures that Uganda's food and nutrition policies are anchored in the public interest.

### **4.3 Evidence-based Information Systems and Coordination**

The lack of a multisectoral coordination approach can hinder the development of a comprehensive NPM that addresses the multifaceted nature of malnutrition. Information and research data are relevant for building evidence-based systems and countermeasures to industry narratives. Collaborative efforts between academia, government, and civil society in promoting healthy diets can create a synergistic effect that enhances information, evidence generation and coherent coordination for public health policy reforms.

Weak coordination among various sectors involved in nutrition, such as health, trade, agriculture, and education, can lead to fragmented efforts and ineffective implementation of public health policies. Due to inadequate coordination, the political commitment to prioritise nutrition may be insufficient, hence leading to the limited integration of nutrition considerations into the broader health and development agenda. Strengthening the nutritional labelling coordination mechanism would involve a multi-stakeholder approach with a focus on representatives of relevant Ministries, Departments and Agencies, Academia and Researchers, Consumer protection associations, Civil society organisation, Human rights organisations, Development partners, and public health experts.

### **4.4 Awareness and Advocacy**

Raising awareness and advocating for healthy food choices stand out as a vital countermeasure to counter the misinformation often perpetuated by the food industry. While the food and beverage industry invest heavily in Corporate Social Responsibility (CSR), structured nutrition education and advocacy initiatives can empower individuals and communities to make informed decisions based on health rather than profit-driven narratives.

Equally, advocacy campaigns led by civil society, academia, and public health actors can amplify public understanding of the dangers of unhealthy diets and push for supportive public health policies. Awareness-raising interventions that highlight the health risks associated with processed and ultra-processed foods not only counter industry narratives but also build grassroots demand for healthier food systems.

By making nutritional knowledge widely accessible and coupling it with strong advocacy, Uganda can reduce the dominance of CSR. Informed consumers are not only able to resist misleading advertisements but also become advocates for healthier food environments, strengthening collective efforts to protect public health.

In effect, most key informants highlighted that mass consumer awareness was the most desired option to counter industry CSR healthy and promote healthier food choices and improved nutrition, as shown in Figure 7.



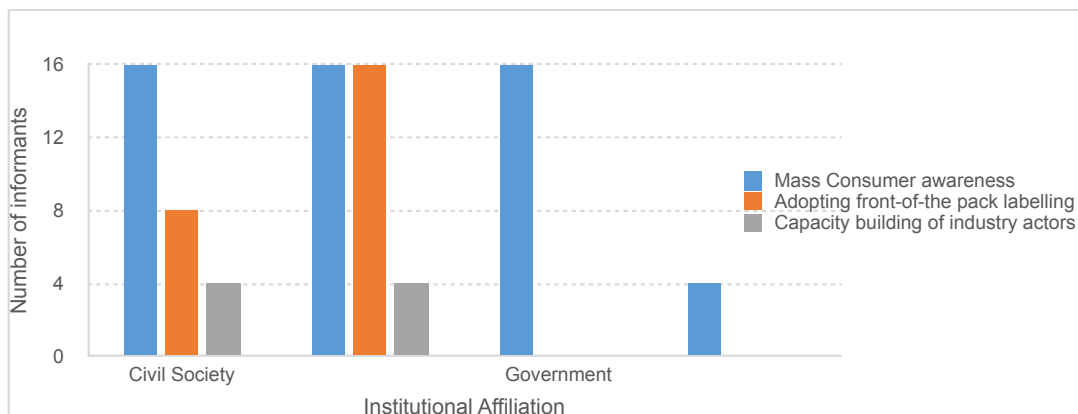


Figure 7: Most desired action to counter CSR and promote healthy food choices and nutrition

## CHAPTER FIVE: CONCLUSIONS AND RECOMMENDATIONS

### 5.1 Conclusions

The analysis reveals that while Uganda is yet to establish a robust policy and legal framework to guide nutrition labelling and consumer protection, significant gaps persist in enforcement, compliance, and policy coherence. Instruments such as the Uganda National Bureau of Standards' US EAS 803:2014 on Nutrition Labelling, alongside broader policies including the Public Health Act, Penal Code Act provide a solid foundation for advancing healthier food environments. However, the effectiveness of these instruments is constrained by inadequate enforcement capacity, fragmented governance structures, and interference from powerful food and beverage industry actors.

Findings from this situational analysis highlight that current nutrition labelling in Uganda remains less informative, hindering consumer awareness and informed dietary decision-making. Compliance by food and beverage industries with existing standards is inconsistent, reflecting a moderate commitment to consumer health and safety. More critically, the adoption of the NPM and FOPWL has been delayed primarily due to corporate political activity, including lobbying, questioning scientific evidence, amplifying trade-related arguments, and exerting influence through high-level political channels. These dynamics expose the extent to which the Food and beverage industry exploits participatory policy spaces and power asymmetries to protect commercial interests at the expense of public health.

Against this backdrop, countermeasures become essential. Coalition building and partnerships can strengthen the collective voice of civil society, academia, and public health advocates, creating a counterweight to industry lobbying. Strengthening governance structures and embedding conflict of interest safeguards in policymaking processes are equally vital for ensuring transparency and reducing regulatory capture. In addition, building strong evidence-based systems and multi-sectoral coordination mechanisms will not only sharpen accountability but also strengthen the technical basis for reforms such as the Uganda NPM. Finally, mass awareness and advocacy campaigns can shift consumer demand away from ultra-processed and unhealthy foods, reducing the persuasive power of industry-driven narratives and corporate social responsibility tactics.

In conclusion, Uganda stands at a critical juncture. While policy frameworks exist, their ability to drive transformation toward healthier food systems depends on closing governance gaps, resisting undue industry influence, and amplifying public health voices. By adopting stronger coalitions, transparent governance, evidence-driven systems, and widespread advocacy, Uganda can advance a food policy agenda that prioritises public health, safeguards consumers, and ensures that food and nutrition policy development is anchored in the public interest rather than commercial profit.

## 5.2 Recommendations

Building on the findings and the proposed countermeasures, the following recommendations are put forward to strengthen Uganda's capacity to safeguard public health and resist food industry interference.

### To policy makers:

#### (i) Strengthen Policy and Legal Frameworks through:

- Adoption of the NPM and FOPWL regulations to ensure clear, accessible, and evidence-based nutrition information for consumers.*
- Enforcement of conflict of interest safeguards within public health policymaking processes to limit undue industry influence.*
- Mandate public disclosure of industry participation in policy development processes to expose potential conflicts of interest.*

#### (ii) Enhance Regulatory Capacity through:

- Building and strengthening capacity among regulators, particularly in handling corporate lobbying and navigating trade-related arguments that undermine public health goals.*

### To Public Health Advocates:

#### i) Promote Coalition Building

- Strengthen coalitions in food industry monitoring to provide a unified and amplified advocacy platform.*
- Encourage cross-sector collaboration between NGOs, academia, health professionals, consumer associations, to counterbalance industry narratives.*
- Establish regional and community-level advocacy groups that can tailor messages to local contexts and build grassroots advocacy for healthier food environments.*

#### ii) Advance Public Awareness and Nutrition Education

- Expand public health campaigns using multiple channels, radio, television, social media, and community gatherings so as to highlight the dangers of ultra-processed foods and the negative effects of food industry interference.*

#### iii) Evidence generation through Research

- Civil society, academia, media, researchers through the Coalition on Front of the Pack Warning Labelling should generate evidence and mobilise communities to counter undue influence from the food industry players in view of accelerating adoption of the NPM and FOPWL in Uganda.*

## Annex I: Observation Checklist

Place		Date	
Institution		Product	
Issue of concern		Details on concern	
Other observations note		Areas of law and policy breached	
Perpetuating factors observed		Pictorial evidence	

## Annex 2: Power Cube Analysis

### Background notes

Power cube analysis explores the 'expression of power': 'power over', 'power to', 'power with', and 'power within' the Ugandan food industry to influence the formulation of the NPM and FOPWL. The framework uses four interrelated domains, including: levels of power, spaces of power, forms of power and their interrelationships. The forms dimension refers to how power manifests itself, including its visible, hidden and invisible forms. The spatial dimension of the power cube refers to the potential arenas

for participation and action, including what we call closed, invited and claimed spaces. The levels dimension of the power refers to the differing layers of decision-making and authority held on a vertical scale, including the local, national and global.

### **A: Forms of Power**

- (i) What are the visible, hidden, and invisible forms of power exercised by key food industry players in Uganda to influence the formulation process of the nutrient profiling model and front-of-pack warning labels?
- (ii) How do industry players use their economic power to shape policy decisions?
- (iii) What forms of hidden power, such as lobbying or behind-the-scenes negotiations, do industry players use to influence policymakers?
- (iv) How do industry players use their symbolic power, such as through marketing or public relations campaigns, to shape public discourse and influence policy decisions?

### **B: Spaces of Power**

- (i) What formal and informal spaces do key food industry players in Uganda occupy to influence the formulation process of the nutrient profiling model and front-of-pack warning labels?
- (ii) How do industry players access and participate in these spaces, and what are the barriers to entry for other stakeholders?
- (iii) What are the power dynamics within and between these spaces, and how do they shape policy decisions?
- (iv) How do industry players use their influence in one space to shape outcomes in another space?

### **C: Levels of Power**

- (i) How do key food industry players in Uganda operate at the local, national, and global levels to influence the formulation process of the nutrient profiling model and front-of-pack warning labels?
- (ii) What are the implications of industry players' global connections and influence for national-level policy decisions?
- (iii) How do industry players use their influence at one level to shape outcomes at another level?
- (iv) What are the opportunities and challenges for civil society organizations and other stakeholders to influence policy decisions at different levels?

### **D: Power Dynamics**

- (i) How do key food industry players in Uganda use their power to shape the policy agenda and influence the formulation process of the nutrient profiling model and front-of-pack warning labels?
- (ii) What are the strategies used by industry players to build alliances, co-opt opponents, and neutralise potential threats to their interests?
- (iii) How do industry players use their power to frame the policy debate and shape public discourse?
- (iv) What are the implications of industry players' power dynamics for the distribution of benefits and risks associated with the nutrient profiling model and front-of-pack warning labels?

### **E: Change and Transformation**

- (i) What opportunities exist for civil society organisations and other stakeholders to challenge the corporate political activities of key food industry players in Uganda?
- (ii) How can stakeholders use their power to influence the policy agenda and shape the formulation process of the nutrient profiling model and front-of-pack labels?
- (iii) What strategies can be used to build alliances and mobilise public support for policies that promote public health and nutrition?
- (iv) What are the potential risks and challenges associated with challenging the corporate political activities of key food industry players in Uganda?



# CEFR<sup>HT</sup>



**FIAN**  
UGANDA

## CONTACT US



Plot 66-67 Kiriwawanvu Lane,  
GACCETA Estate, Gayaza-Wakiso  
P.O Box 16414 Wandegaya



**0773-000-000**



**info@cefroht.org**



**www.cefroht.org**

