**PRESS STATEMENT**

**THE STATE OF FOOD SAFETY IN UGANDA**

***‘‘FROM FARM TO FORK: THE RELEVANCE OF STANDARDS IN PROMOTING FOOD SAFETY’’***

**For immediate Release**

**Sunday, 4th June 2023│SEATINI Uganda Offices, Kampala:**

We, the Civil Society Organizations (CSOs) working on trade, the Right to Food, Health, land, investment and agriculture related issues join the rest of the world to celebrate this year’s World Food Safety Day which is scheduled for 7th June 2023.

 This year’s World Food Safety Day will be celebrated under the theme; *‘‘Food Standards Save Lives’’* which underscores the importance of applying standards in every aspect of food production - from the source to the table.

We recognize and applaud the various stakeholders especially the Government of Uganda for their renewed and maintained commitment towards the achievement of utmost compliance to the standards that guarantee food safety and the right to adequate food and nutrition. We further recognize the steps and strategies deployed to prioritize compliance with standards along the food chain while addressing the various issues related to agricultural trade, environmental justice, children's rights, farmers' rights, and fiscal and human rights-related issues.

Food safety is a critical concern that affects the health and well-being of individuals, communities, and nations. World Food Safety Day, observed on June 7th each year, provides an opportunity to reinforce the importance of safe food practices, highlight potential risks, and advocate for the implementation of robust food safety measures.

**Food Safety: State of Play and Context**

Globally, Food Safety related challenges including malnutrition and food insecurity are inextricably linked and on the exponential rise.

According to WHO (2015), an estimated 600 million – almost 1 in 10 people in the world suffer from food-borne illnesses and 420,000 die every year, resulting in the loss of 33 million healthy life years (DALYs) (WHO, 2015). In Africa, about 91 million people fall ill each year from food-borne illnesses and account for one-third of the global death toll for foodborne diseases. According to the World Bank, (2019), an estimated USD 94.2 billion is lost each year in labour productivity while medical costs resulting from unsafe food in low and middle income countries amount to USD 15Billion. Children under 5 remain the primary victims of food safety challenges, carrying 40% of the foodborne disease burden with 125,000 deaths every year.

In Uganda, Complacency of consumers, low compliance of the food actors and the weak enforcement of the food governors is the breeding ground for production, trading, and consumption of Unsafe food in Uganda.

Food safety challenges continue to escalate each year, with Uganda registering about 1.3 million cases of food-borne illnesses annually, which account for 14% of all cases treated as reported by Ministry of Health (MoH). Aflatoxin contamination is a rapidly growing burden in Uganda’s food system, with up to 65% of maize containing aflatoxin levels above the Ugandan maximum limit of 10ppb for total aflatoxins as reported by Partnership for Aflatoxin Control in Africa (PACA). Aflatoxin contamination reduces economic growth by 0.26%.

Furthermore, according to FAO, the country suffers a loss of USD 77 million on treatment of 3700 cases of aflatoxin-induced cancer cases. Aflatoxins cause a decline in export value estimated at USD 7.48 Million, which accounts for a 45% reduction in total agricultural export. Uganda’ maize has severally been rejected in neighbouring countries commonly in Kenya and recently South Sudan citing high levels of aflatoxins in grains that have equally contaminated the poultry and dairy products through contaminated animal feed, reducing production and increasing the consumption of the toxin through poultry and dairy products.

Food safety concerns are rapidly increasing in Uganda owing to the high use of contaminated water in cleaning of fruits and vegetable. As such, chemicals are visible on most vegetables such as tomatoes sold in the urban centres, Kampala inclusive. A study conducted by Rikolto in Kampala and Mbale cities indicated that 82% (100% in Mbale and 75% in Kampala) of all the sampled vegetables and fruits contained carbamates. Transporters and traders apply chemicals during transportation and storage within the market places. In addition, Food fraud remains a growing phenomenon with adulterated foods and beverages flooding the market; advertised without regulation, and sold to unsuspicious consumers. Further, the application of unregulated chemicals and other substances such as formalin has increased among milk and meat traders.

Food safety risks have remained a permanent challenge to the urban populations across the country due to food vending in open undesignated spaces such as the road side, along drainage channels, in taxi parks, market places, and along all streets. Such places commonly known as “Toninyira” are grounds for most food borne illnesses in the country. All these issues are exacerbated by the low level of enforcement of standards by government, which reduces compliance among food actors and in turn builds complacency among consumers.

**As CSOs, we commend Government for;**

1. Establishing regional food safety laboratories (Northern Uganda in Gulu city, Eastern region in Mbale city, Western Region in Mbarara city) that are expected to complement UNBS Central Laboratories to decentralize standards and conformity assessment services nearer to producers and Micro, Small and Medium Enterprises (MSMEs) that are involved in processing and value addition in the agricultural value chain.
2. Demonstrating commitment to Food Safety standards development and harmonization at the regional and global levels. By the end of FY2021/22, a total of 428 Ugandan standards for food and agriculture, engineering, chemicals and consumer products, and management and services were developed and approved by the national standards council[[1]](#footnote-1).
3. Putting in place a robust Food Safety Policy framework predominately governed by the Food and Drug Act, 1964 and implemented various initiatives both in the past and present to ensure access to safe and adequate food for its citizens, in line with the international food safety standards of the Codex Strategy plan. [[2]](#footnote-2) Among these are 22 food and nutrition laws, 12 Action Plans/Strategies, 6 policies, 6 standards and 9 regulations aimed at protecting citizens including infants, young children, the elderly, breast feeding mothers and the sick against the vicious cycle of disease and malnutrition caused by unsafe food.
4. In addition, Government under MAAIF in partnership with various Development Partners has allocate resources towards campaigns, projects and initiatives that advocate for adoption of modern agricultural practices that aim at **increasing production and consumption of micronutrient-rich foods and utilizing community-based nutrition services in smallholder households.**[[3]](#footnote-3)

Despite the progress registered, the food supply chain in Uganda has faced 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). [[4]](#footnote-4) These issues continue to pose a threat to food safety in Uganda potentially hindering the achievement of SDG goal 2 (Zero Hunger), SDG 3 (Good Health and Well-Being) and SDG 12(Responsible Consumption and Production).

Uganda is also losing approximately $200m (over Shs 700billion) in export of agricultural products to markets especially in the European Union and the United Kingdom due to among others, non-adherence to requisite standards and using agricultural chemicals that have been banned globally.

As Uganda remains committed to the Sustainable Development Goals (SDGs), development of a sustainable food system that emphasizes food safety is essential for the implementation of the SDGs.[[5]](#footnote-5) Therefore, implementing standards, guidelines, and codes of practice along the food supply chain can prevent contamination of food and prevent the spread of foodborne illnesses that can harm consumers' health.[[6]](#footnote-6)

Premised on the above, we the undersigned call upon government through its MDAs to address some of the barriers as highlighted in this presser hindering the effectiveness of food safety policies and initiatives. These pressing concerns demand immediate attention to prevent further shortcomings.

**Our concerns:**

1. **Uganda off-track on the CAADP Malabo commitments on food safety:**

According to the 2022 CAADP Biennial report, Uganda has neither met the set target for the Africa Food Safety Health Index nor has it met the Food Safety Trade Index targets. As such, it is a no wonder that numerous agricultural products are rejected in regional markets. Unfortunately, it is the regular Ugandan consumer who bears the brunt of these challenges as they can only afford the unsafe foods sold widely on the market.

1. **Government’s failure and omission to ban the use of Glyphosate and Glyphosate Based Herbicides** (GBHs) which threatens and is a violation of the right to life, health, right to adequate food and to a clean and health environment guaranteed under Objectives XX, XXII, Articles 20, 45, 8A and 33 of the Constitution of the Republic of Uganda.
2. **The Food and Drugs Act, 1964, a fundamental law that governs food safety in the country has not been amended to account for changes in technology**, rising food safety related issues, and challenges related to agricultural practices, and food production among others. For example, the government converted 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 and processed foods.
3. **Fragmentataion of the food safety mandate accross various Ministries and Agencies.** UNBS’ mandate to develop and enforce standards for food is limited not to override the authority of other Agenices like Dairy Development Authority (dairy products), Uganda Coffee Development Authority(coffee) and fish and meat regulated by designated departments in MAAIF. As it stands, the mandate for food safety currently falls under several ministries, including the Ministry of Local Government (MoLG), MoH, MAAIF and MTIC, This fragmentation of mandates leads to weak coordination of actors, plans, and programs on food safety. However this could change if cabinet decision to establish the Food, Animal and Plant Health Authority is upheld, well-funded and given the sole mandate role through legislation.
4. **Food safety not fully encompassed in Uganda’s legislation.** The food policy environment is diverse, but food safety is limited to a few policies and laws and remains an orphaned element in the Food and Drugs Act of 1964.[[7]](#footnote-7) This has cause dependence on other legislations to uphold food safety including the Food and Nutrition Act (2020). In addition, only the Public Health Act, 1935 address elements of food safety, however this is limited to only meat and milk.[[8]](#footnote-8)
5. **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 supported by the National Standardisation Strategy (2019–2022). 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.
6. **Weak enforcement of standards and proliferation of counterfeits:** Uganda is currently facing a significant challenge in its efforts to curb the proliferation of substandard and counterfeit products, which is having negative impacts on production, processing, and product competitiveness in local, regional, and global markets. The weak enforcement of standards, coupled with inadequate funding for quality assurance agencies has contributed to the increasing presence of substandard goods in the market.
7. **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 machines used in processing food, such substances end up in food particularly Posho, millet flour and grounded nuts, compromising food safety. More so, the continental Aflatoxin Control Action Plan (ACAP) that 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.
8. **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 Drug (Food Fortification) Regulations, 2011 (No.53) guide food fortification regulations for various food stuffs stipulating that “all foodstuffs in Uganda shall be fortified in accordance with national standards”. However, some food items like salt, maize and wheat are below the minimum requirements per the standards. As per EPRC 2022 study, only 4 out of 28 maize millers were fortifying maize flour.
9. **Adherence to existing standards is still an enormous challenge:** Producers often find it difficult to meet standards at the domestic, regional and international levels. Adherence to Sanitary and Phyto-sanitary standards in various export markets is also still a big challenge for the producers and the private sector. Several standards are in place, such as UNBS Standards # US CAC/RCP 39:1993 code, which lays out hygienic food practices in cases of mass catering. 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.

**Our recommendations and call for Action:**

* **Streamline the food safety enforcement mandate.** Cabinet resolution to establish the Food, Animal and Plant Health Authority should be fast tracked. To avoid duplications of mandates as often seen a clear mandate and overall responsibility for ensuring food safety should be vested in the authority in collaboration with agencies for support.
* **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
* **Restore hygiene and sanitary inspection systems** 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.
* **Strengthen enforcement of standards**: By increasing funding for quality assurance agencies through adequate staffing to undertake market surveillance, testing, and certification activities. There is also a need to enhance the capacity of border agencies to detect and prevent the entry of substandard and counterfeit products into the country.
* **Invest in data collection, management and research:** There is a need to invest in data collection and management systems for food safety in Uganda to ease on effective implementation of food safety measures, policy formulation and enforcement. The establishment of a comprehensive food and nutrition data system can provide timely and accurate information to guide policy-making on food safety. Such a system should incorporate data on foodborne illnesses, food production, distribution, and consumption, as well as food safety risks and emerging trends. This will enable Uganda address food safety gaps through robust research.
* **Promote sustainable agriculture practices:** To address the negative effects of agrochemicals on human health and the environment, there is a need to promote sustainable agriculture practices in Uganda. MAAIF should enforce the National Organic Agriculture Policy to promote organic farming practices, the use of natural pest control methods advancing agro-ecology and minimise the use of agrochemical. There is also a need to enhance public awareness on the health and environmental risks associated with the excessive use of agrochemicals. Enforce section 18 of the Agriculture Chemicals (Control) Act 2007 which provides for regulation of the use, transport, storage advertisement and disposal of pesticides
* **Improve post-harvest handling and storage**: The challenges faced by the coffee and dairy sectors in meeting international quality standards highlight the need to improve post-harvest handling and storage. This could involve providing training to farmers on best practices in post-harvest handling, investing in cold storage facilities, establishment of government sponsored common –user facilities and improving market information systems to enable farmers to access international markets.
* **Fast track the implementation of the various food safety strategies:** 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. Regulations for Nutrient-Dense Foods should be prioritized to ensure that these foods meet rigorous safety and nutritional standards for healthy feeding and growth in young children.
* Strengthen and Enforce Regulation of Breast Milk Substitutes: The government of Uganda should strengthen the regulation and enforcement of marketing, distribution, and use of breast milk substitutes, in line with the International Code of Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions. Robust regulations should be in place to restrict the aggressive promotion of breast milk substitutes, discourage inappropriate advertising practices, and ensure accurate and unbiased information is provided to healthcare professionals and caregivers. By regulating the marketing of breast milk substitutes, we can protect infants from unnecessary exposure to potentially harmful or inadequate alternatives.

In conclusion, we strongly believe that addressing the challenges above requires collaborated efforts from both State and Non-State Actors and strengthening the roles of relevant institutions, investing in data collection and management, enhancing surveillance and enforcement of standards, and promoting sustainable agriculture practices among others. Let’s raise the consciousness of consumers to ask questions about food beyond just the price. The primary cost and impact of consuming unsafe food is personal. As such;

* Actors in the Food chain should take full responsibility to keep the food safe for consumption.
* Communities should report to relevant authorities actors engaging in adulteration, defrauding and contaminating food and/or means of production, handling and preparation.
* Relevant government bodies should prioritize not only developing relevant food standards but also enforce them at all levels of the value chain.
* Remember, if it is not safe; it is not food

**Food safety is Everyone’s Business!**

1. [Pesticide Use Practices Among Smallholder Farmers in Uganda- 2019](https://www.frontiersin.org/articles/10.3389/fsufs.2019.00054/full) [↑](#footnote-ref-1)
2. [Codex strategic Plan 2020-2025](https://www.fao.org/documents/card/en/c/ca5645en) [↑](#footnote-ref-2)
3. *MAAIF Projects include the Agriculture Cluster Development project and Uganda Multi-Sectoral Food Security and Nutrition project (UMFSNP) among others*  [↑](#footnote-ref-3)
4. *UNBS. (2019). Food Safety, Everyone’s Business. UNBS, 7th June 2019. Kampala: Uganda National Bureau of Standards (UNBS). Retrieved from https://www.unbs.go.ug/news-highlights.php?news=100&read 40319. https://doi.org/10.1371/ journal.pone.0140319* [↑](#footnote-ref-4)
5. [*View point: Rigorous monitoring is necessary to guide food systems transformation in the countdown to the 2030 global goals*](https://www.sciencedirect.com/science/article/pii/S0306919221001433) [↑](#footnote-ref-5)
6. [*World Health Organization (2022). Food Safety*](https://www.who.int/news-room/fact-sheets/detail/food-safety) [↑](#footnote-ref-6)
7. [*U.S. and Ugandan food safety systems: a challenge to create development partners*](https://www.canr.msu.edu/iflr/uploads/files/Student%20Papers/US_Ugandan_Food_Safety_Systems.pdf) [↑](#footnote-ref-7)
8. [*EPRC POLICY BRIEF NO. 156 DECEMBER 2022*](https://eprcug.org/publication/does-ugandas-food-policy-environment-respond-to-the-food-safety-needs-of-the-population/?wpdmdl=15376&refresh=64738735d13e21685292853) [↑](#footnote-ref-8)