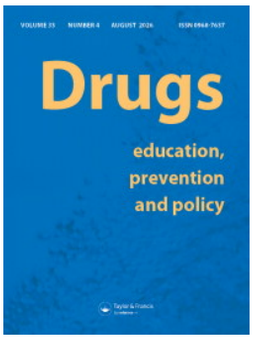

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Upstream policymaking in Africa: a case study analysis of the district to national alcohol sachet bans policy transfer in Uganda

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ABSTRACT

Background: High rates of heavy episodic drinking in Uganda have been linked to alcohol sachets due to their affordability and widespread availability. The Gulu district enacted a local sachet ban in 2016 which transferred to a national ban in 2019 to protect population health. This paper examines this transfer.

Methods: Seventeen semi-structured interviews were conducted with government representatives, NGOs, and civil society members at district and national levels, alongside a review of eleven key policy documents. Data were thematically analyzed. We applied Jensen et al's framework.

Results: For both bans, the rationale was to reduce alcohol availability and harms. The local ban inspired the national ban which was enacted following further parliamentary discussions, and the resolution of ministerial disagreements. Implementation involved a multi-sectoral taskforce, and goods seizures in both cases. Those bans successfully withdrew sachets from the market but have not been evaluated.

Conclusion: In a context of limited progress on national alcohol policy implementation across the continent, this study of a local to national alcohol policy transfer in Africa offers valuable learning. It shows how local governments in decentralized systems can advocate for strong alcohol regulation and should be recognized as partners in upstream policymaking. Future evaluation is needed to assess the long-term effectiveness and public health impact of the policy.

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Introduction

The World Health Organization (WHO)'s African region has some of the highest levels of alcohol-related harms globally, with around 52 deaths per 100,000 population (World Health Organization, 2024). Although overall fewer people drink alcohol in Africa compared to other regions, those who do drink more heavily (Bryazka et al., 2022; Griswold et al., 2018; N. K. Morojele et al., 2021). In Sub-Saharan Africa, heavy episodic drinking has become a dominant pattern among many drinkers (Belete et al., 2024; Harker et al., 2020). In Uganda 22% of drinkers aged over 15 are heavy episodic drinkers, rising to 32.8% for male drinkers alone (World Health Organization, 2024).

The reasons for this increase in consumption are manifold but include a well-reported increase in marketing by the alcohol industry (Dumbili et al., 2025; Jernigan & Babor, 2015; Lesch et al., 2024; Letsela et al., 2019; Mathoothe et al., 2021; Swahn et al., 2025), as well as rises in the availability and affordability of alcohol, and an increased normalization of alcohol use (Ferreira-Borges et al., 2017; Letsela et al., 2019; N. Morojele et al., 2021; N. K. Morojele et al., 2021). Aggressive marketing and pricing strategies have had a demonstratable impact on consumption, particularly amongst young people (Dumbili et al., 2025; Ebrahim et al., 2024; Fleming et al., 2004; Jumbe et al., 2025; Swahn et al., 2025). In Uganda, heavy consumption is driven by widespread alcohol

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availability, high outlet density, poor licensing systems, high affordability, aggressive marketing and weak alcohol control policies (Atusingwize et al., 2022; Bruijn, 2011; Lesch et al., 2024; Nabifo et al., 2021; Purves et al., 2025; Sserunjogi, 2018; Swahn, Culbreth, et al., 2022; Swahn et al., 2024; Swahn, Palmier, et al., 2022).

One particularly cheap and widely available product in Africa has raised concerns in recent years: the alcohol sachet. Alcohol sachets are small, soft, pouch-style plastic bags typically containing 100 or 200 ml of high strength alcohol (e.g., spirits, gin). Links to harmful consumption from sachets have been highlighted in a number of African countries such as Uganda, Malawi, and Nigeria (Arasi & Ajuwon, 2020; Kasirye, 2023; Salimu & Nyondo-Mipando, 2020; Uny et al., 2025). This has led some countries to ban those sachets in the past decade (Kasirye, 2023). In Uganda particularly, sachet consumption has been linked to heavy consumption, particularly among young people and other vulnerable populations, and to serious injuries (e.g. through consumption of untested or tainted content), social harms, and risky sexual behaviors (Bonnevie et al., 2020; Otim et al., 2019; World Health Organization, 2023). Sachets have been reported as highly affordable (as low as $0.18 per sachet) and extremely available, as they were sold by licensed retailers (bars, shebeens which are informal alcohol sale outlets) and informal street traders and vendors (Meulenbeek, 2012; Smart et al., 2021). The emergence of sachets across Africa, over the past decade or more, has been seen as significantly increasing the availability of alcohol.

The SAFER Framework from the World Health Organization recommends a number of policy actions to control alcohol availability (World Health Organisation, 2019), such as establishing or strengthening licensing systems to monitor production, wholesale, sale, delivery, and serving of alcohol; regulating the number, density, and location of retail outlets; controlling the days and hours of sale; setting a national minimum legal age for purchase and consumption; and restricting alcohol use in public places. To address this problem at a local level in Uganda, the Ugandan district of Gulu decided to ban sachets from sale and manufacture, thein 2016 (Gulu District local government-(DUO4). A few years later in 2019, a national ban was announced within the new National Alcohol Control Policy (NACP).

This paper traces the history of this local to national alcohol policy transfer of a measure to control alcohol availability. It uses data from a comparative qualitative study entitled "*Regulating alcohol packaging and supply to protect health in Sub-Saharan Africa: evidence from policy systems in Malawi and Uganda*" (RAPSSA; 2022-2024). We reported on the Malawi sachets ban separately (Uny et al., 2025). Understanding these processes is important to advance alcohol control policies in Africa, where over 20 countries still do not have comprehensive national alcoholpolicies; across the continent, weak regulation and the packaging of alcohol in sachets and small quantity bottles has been recognized as increasing access and availability in the agreed Global Action Plan (World Health Organisation African Region Secretariat, 2023).

Conceptual frameworks

This paper uses Jensen et al's 2017 framework on policy transfer. A policy transfer can be understood as a transfer of policy ideas or aims, policy content or instruments, from one context (or political system) to another. Jensen's framework is based on a comprehensive review of the international health policy transfer literature (Jensen et al., 2017) and outlines six phases of transfer: 1) conceptualization (because policy transfer begins when stakeholders identify transferable solutions from any contexts); 2) formation (where policy concepts transferred are codified into concrete guidelines and operational frameworks); 3) internalization (where a recipient country accepts a transferred policy as part of their own national systems); 4) contextualization (when transferred policies are modified to fit recipient country realities); 5) operationalization (when recipient countries implement transferred policies domestically, aligning those to their own objectives, despite external influence); and finally 6) evaluation (an assessment of the transferred policy performance) which is rarely done (2017). Throughout the paper, we also remained cognizant of the fact that policy processes are led by actors and that actors' behavior in policy processes influences and is influenced by the context in which they take place (Buse, K., Mays, N., Walt, 2012; Walt & Gillson, 1994).

Jensen et al.'s comprehensive review shows that there is generally little evidence or discussion of local to national policy transfers, as analyses often focus on cross-national or global to national policy transfers. We not only address this conceptual gap but also the fact that examples of local to national health policy transfers are mainly limited to case studies from global north countries (Eta & Mngo, 2021; Gavens et al., 2019; Hisey, 2025; Jentzsch, 2017; Rutledge & Tozer, 2019; Sugiyama, 2012). Analyses of local to national policy transfers are even rarer in the alcohol policy field, with only two notable exceptions from the United Kingdom (Gavens et al., 2019; Lesch & McCambridge, 2023).

Therefore, our paper offers a unique example of local to national alcohol policy transfer in the Global South, and a novel application of the Jensen et al's framework. In this paper, we examine how the sachet ban was conceptualized at district level (2016) and then was internalized, contextualized and adopted at national level (2019). We also detail the implementation modalities at each level.

Methods

Our study used two main qualitative methods. We conducted a document review of key policy documents alongside key informant interviews, which most suited our dual goals of understanding the process of the policy transfer (content and ideas), and the country context within which the transfer took place. A similar approach has been used in a number of alcohol policy analysis studies (Bertscher et al., 2018; Haragirimana et al., 2024; Lesch & McCambridge, 2023; Uny et al., 2025).

Documents review

The documentary analysis enabled us to explore the process and content of the ban, and to help us develop a key timeline of events, as has been done in other alcohol policy papers with similar focus (Bertscher et al., 2018; Lesch & McCambridge, 2023). We developed a simple protocol for the documentary review based on the READ approach, which consists of reading documents, extracting data, analyzing data, and writing findings (Dalglish et al., 2020). Members of this team have used READ in other alcohol policy analysis papers in Burundi and Malawi (Haragirimana et al., 2024; Uny et al., 2025). Through existing contacts and iterative web searches, we identified the main documents related to the alcohol sachet bans between December 2022 and July 2023. Some of the documents included were passed on to the Team by key actors or policymakers. We included any written documents detailing the timelines, actors, content, process, and context of Uganda's national and local sachets bans. Exclusion criteria ruled out documents not related to Uganda or with no reference to the sachets bans and not in English,due to translation resource issues. Initially, we reviewed 27 local and national government documents, legislation, policy and regulatory documents, district committee minutes, and reports. Although we originally found a few media articles on the bans, we did not include them as they did not offer additional information not already contained in the documents included. Table 1 shows the 11 documents included, which range from legislation to reports, official press released statements and committee minutes. Within the paper, we use the unique reference number for each document from the table below, each time we quote or summarize their content.

Key informant interviews

Participant recruitment and data collection

Seventeen participants were recruited for the study in the Gulu District and in Kampala (Uganda's capital), from March to December 2023. 10 participants were from the National level, and 7 from the local level; however, some NGOs represented operate at both levels, as do Parliamentarians. We employed purposive sampling at first to recruit our participants, using our own networks and the documents we had to approach the actors most central to the process of the district and national bans. We started with those who had a key role in developing or enacting the bans, which was facilitated by the Uganda Team's knowledge who have worked in the area of alcohol harm and policy for over a decade. Those we approached recommended others and our sample snowballed from there (Clark et al., 2021). We had intended to interview fifteen due to the scope of the small study, but managed to recruit seventeen, although it took a number of months due to the difficulty in gaining interviews with busy policymakers. The recruitment stopped once we reached information saturation, in line with the research objectives. Industry representatives were excluded due to conflicts of interest well reported in Africa (Bertscher et al., 2018; Lesch et al., 2024; Mathoothe et al., 2021; Mitchell et al., 2025; Mitchell & Uny. I, 2025). Table 2 below presents the participants' characteristics. Due to the controversial aspects surrounding alcohol policies in general (McCambridge et al., 2018), and considering the small pool of decision-makers and influential actors engaged in alcohol policymaking in Uganda, we present only general details of our study participants. This is to maintain confidentiality and protect their anonymity following established practices (Haragirimana et al., 2024; Lesch & McCambridge, 2023; Uny et al., 2025).

Data collection

All participants granted their consent in writing. Most interviews were conducted by CN and a few by NT, for the most senior interviewees (we use authors' initials here). The team received additional training from IU and guidance from NF, two experienced qualitative researchers and experts in conducting 'elite interviews' regarding alcohol policy. Interviews with elite stakeholders necessitate additional trust and relationship

Table 1. Characteristics of the documents included.

Category (based Dalglish et al. 2020)	Document type and [policy level]	Unique reference Number	Document Title	Published By	Date of Publication and Reference
Official Document	National policy [national]	DU01	National Alcohol Control Policy	Ministry of Health	2019; (Ministry of Health-(DUO1), 2019)
	Draft legislation [national]	DU02	The Alcoholic Drinks Control Bill	Government of Uganda	2023; (Government of Uganda-(DUO2), 2023)
	Ordinance (local legislation)	DU04	Alcoholic Drinks Control Ordinance, 2016	Gulu District Local Government	–2016; (Gulu District local government-(DUO4), 2016)
Working Document	Committee Minutes	DU05	Gulu District Local Government alcoholic drinks control ordinance 2016 (Minutes)	Gulu District Local Government-Office of the District Chairperson	2023; (The Office of the District Chairperson-(DUO5), 2023)
	Operational plan	DU06	Expected Plan for the Operations to be Conducted by the Multi Sectoral Force	Multi-sectorial sachet ban directive implementation force	2019; (Ministry of Trade Industry and Cooperatives (DUO6), 2019)
	Inspection report	DU07	First meeting of multi sectoral task force to discuss ways of active implementation on the ban of sachet alcoholic spirits and alcoholic spirits packed in containers amounting to 200ml.	Uganda National Bureau of Standards	2019; (UNBS-(DUO7), 2019)
	Report	DU03	Towards an alcohol Ordinance, Gulu District Council	Tessa Laing and Dr. Nicolas Laing	2015;(Laing & Laing (DUO3), 2015)
	Operational Report	DU08	Report on campaign aimed to get rid of sachet alcoholic spirits and those packaged in containers less than 200ml from the market	Uganda National Bureau of Standards	2019; (UNBS-(DUO8), 2019)
	Operational Report	DU09	First joint operation by the multi-sectoral task force to get rid of alcoholic spirits packaged in sachets and containers of less than 200ml	UNBS, Uganda Revenue Authority and Uganda Police	2019; (UNBS-(DUO9) et al., 2019)
	Inspection report	DU010	Inspection report for Andika Geofrey Premises, Kirombe	Uganda National Bureau of Standards (UNBS)	2021; (UNBS-(DUO10), 2021)
	Official Statement (Press release)	DU011	Ban of packaging of alcohol in sachets	Ministry of Trade, Industry, and Cooperatives (MTIC)	2016; (Ministry of Trade Industry and Cooperatives (DUO11), 2016)

building by researchers, greater flexibility, and increased attention to anonymity and confidentiality (Lancaster, 2017; Liu, 2018); NT had conducted numerous interviews with policy actors in Uganda and was able to direct and support the research assistant (CN). Interviews were audio-recorded and lasted an average of 57 minutes. A topic guide was used, covering the following domains, which applied to both those with district ban and national ban knowledge and experiences: i) roles in any consultations, advocacy, and policy development; ii) understanding and experience of the ban on sachet alcohol and its conceptualization; iii) perceptions of the rationale for the sachets bans and their formulation; iv) perceptions and experience of the implementation and outcomes of the ban and their consequences; and v) views on policy options to address harmful alcohol use. In this paper, we report on the analysis of the data from themes i) to iii), whilst the other themes will be reported in a separate paper.

Data analysis

Documentary analysis

We used a matrix to extract the documents data. which was extensively discussed by the team with directions from IU, MO, and GM. To extract the data, we used 16 domains which included: type of document, stated purpose of the document, document author (actor's position), expressed target of the document (related to the ban of alcohol sachets), unintended consequences of the ban, definition of small packages/sachets of alcohol, explanation of the problems linked to the consumption of sachets, proposed policy alternative or solutions to the sachet ban, deliberations and consultations,

Table 2. Participants characteristics.

Participant Unique reference number (as used in quotations)	Participant Type	Policy level
INTU1	Non-Governmental Organization	National
INTU2	Non-Governmental Organization	National
INTU3	Government	National
INTU4	Non-Governmental Organization	National
INTU5	Government	National
INTU6	Government	District
INTU7	Government	District
INTU8	Government	District
INTU9	Government	District
INTU10	Government	District
INTU11	Government	District
INTU12	Government	District
INTU13	Government	National
INTU14	Government	National
INTU15	Government	National
INTU16	Government	National
INTU17	Civil Society Organization	National
	TOTAL	**17**

negotiations on policy alternatives, how the ban was formulated, how it was implemented, policy evaluations, structural and cultural factors, international and exogenous features of context and other relevant information in the document. The data were analyzed thematically by NT, CN, MO and IU following the six steps from Braun and Clarke's method: familiarization with the data, generating initial codes, searching for themes, reviewing themes, refining and naming themes and producing the report (Braun & Clarke, 2006, 2024). We organized our findings under a hierarchy of linked themes and subthemes relating to the various steps of policy transfer and later merged these with the themes from the interviews (remaining mindful throughout of convergence and divergence around those themes).

Analysis of data from key informant interviews

The transcripts from the interviews were anonymized and uploaded into the NVivo20 software to support the analysis. Following the thematic analysis steps outlined above, the research team first read and reviewed a selection of transcripts, noting emerging themes relating to the six steps of the Jensen framework. We then met several times and developed a hierarchy of themes and subthemes, which formed the initial coding framework. This draft codebook was piloted on several transcripts and refined further by the Team, before being applied, in its final version, by CN to code the data (NT and IU checked the coding for reliability). In the next stage, we adopted a framework approach, using the matrix function in NVivo to first summarize and organize the data (Gale et al., 2013; Ritchie et al., 2014) under key emerging themes. This approach is well-suited to interview data, as summarizing the data into a framework grid facilitates a rigorous analysis across all cases (interviews). Those summaries were transferred to Word, an organized into themes and subthemes, then compared and merged with the documentary analysis themes, providing a new overarching thematic structure, leading to a set of results organized according to the Jensen et al.'s framework.

Consistent with Braun and Clarke's approach to trustworthiness in reflexive thematic analysis, we did not apply forms of triangulation more consistent with positivist approaches, but favored transparency and depth of analysis and interpretation (Braun & Clarke, 2024). This means that at all steps (coding, summarizing, thematic organizing and interpreting), IU, NT, CN and PO held reflective meetings. This allowed the team to collaboratively apply sense-checking, challenging and deepening interpretations through discussion, to enrich the analysis and the fit with our conceptual framework. The quotes we present in the results draw from both documents and interviews; the quotes labels refer to the details from Tables 1 and 2.

The authors of this paper hold a constructivist approach to qualitative research, meaning that they consider social phenomena (which include policy decisions) to be constructed by actors within their relationships with other actors and their ever-changing social environment (Clark et al., 2021). Within the interviews and throughout the analysis, we were mindful of our position as public health researchers and expert elite interviewers (both in the UK and Uganda). We also remained cognizant throughout of power and political dynamics, stakeholder interests, and the norms and beliefs of the key informants around the topic of inquiry (Niu, 2024). For that reason, we applied a reflexive thematic analysis approach, fostering deep engagement with the data, thick thematic descriptions, and applying our theoretical framework (Braun & Clarke, 2024).

Results

A timeline of policy events

Our review of the documents and our interviews showed that the Gulu District ban and the National sachet ban developed over many years, involving multiple actors, as is common in policy development. In this section, we summarize retrospectively the context of the local and national alcohol sachets bans. We offer a reference timeline showing key events occurring between 2006 and 2024 (Figure 1) in this story.

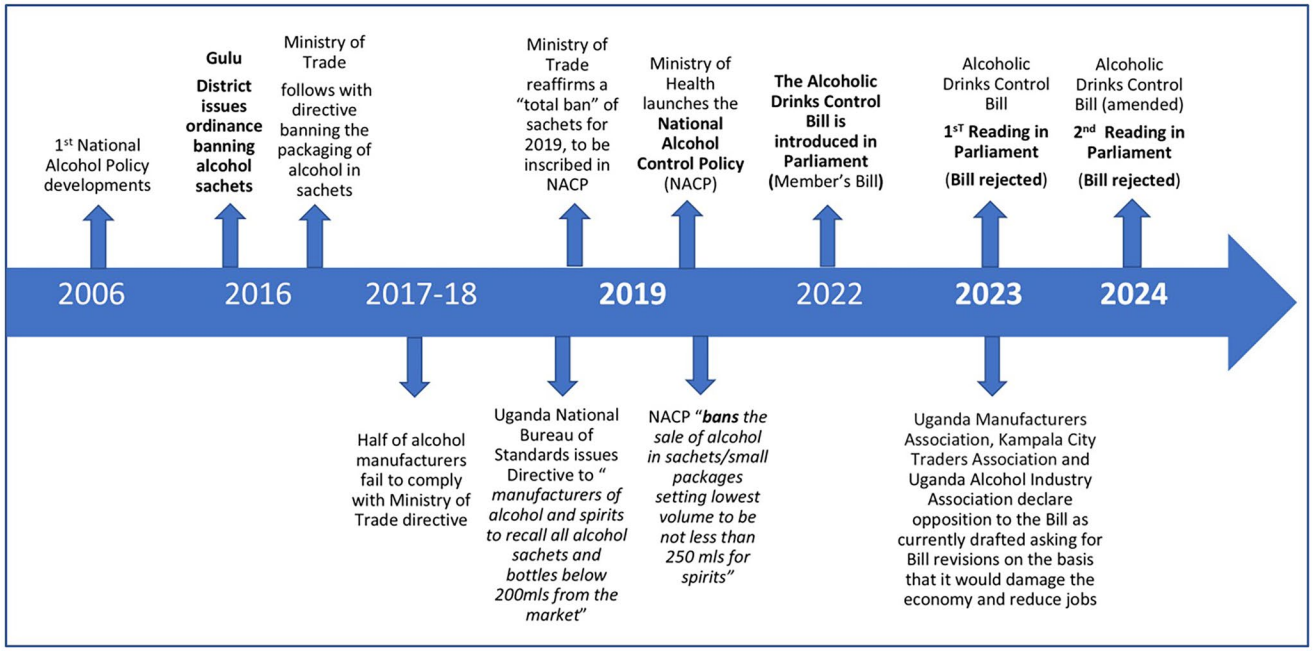

Figure 1. A brief timeline of events on the sachets bans in Uganda.

Our timeline starts in 2006, as some actors reported that there were efforts to develop a national alcohol policy at that time, though it was unclear whether this early policy process included a sachet ban idea. Explicit concerns about the sachets were reported as starting as early as 2008 in northern Uganda, which encouraged the Gulu District to enact an ordinance in 2016 (Gulu District local government-(DUO4), 2016). The decentralized system of local Government allows the districts, authority to pass local ordinances, to address issues of concern where those local laws do not conflict with the Ugandan Constitution or Acts of Parliament (Mugyenyi & Kagarura, 2020). In 2014 the Kitgum District Council had passed a temporary resolution banning sachet alcohol, and a few other areas had used bylaws to regulate the sale, production, and consumption of alcohol in general (Laing & Laing (DUO3), 2015). Whilst a resolution is only a temporary administrative decision, and a bylaw is used only at a lower local or traditional administrative levels, we focused on the Gulu District,where a full ordinance was issued, which was more significant (Mugyenyi & Kagarura, 2020).

The 2016 Gulu ordinance is a policy document which covers alcohol licensing, hours of sales, age verifications and also includes an alcohol sachet ban(Gulu District local government-(DUO4), 2016). This document, at the time, inspired the Ministry of Trade to attempt a similar directive to ban sachets nationally, but building in one-year transition period that would lead to a phased in nationwide ban (Ministry of Trade Industry and Cooperatives (DUO11), 2016). However, manufacturers negotiated extensions, and interministerial disagreements led to the sachet ban transferring to the national level only in 2019 (Ministry of Health, 2019, p. 17). The NACP,which contains the national sachet ban under marketing regulations, was modeled on the evidence based 'best buy' policies advocated iby the WHO SAFER Framework (World Health Organisation, 2019). It proposes stronger regulation of alcohol production, marketing, pricing, and availability, while building health system capacity to treat alcohol use disorders. A Draft National Alcoholic Control Bill was introduced in 2022 to turn the NACP into legislation but failed to pass at successive readings in 2023 and 2024 in the Parliament.

The conceptualization of the ban

In terms of Jensen et al's framework first step (conceptualization), our findings show that the rationale for a ban was the same for both the district and the national ban, to protect population health and to reduce the availability of alcohol. This was stated in the majority of the interviews and in some of the documents we reviewed for Uganda at the District level (DU03; DU04; DU05).

> Overall, [it] was to protect the health and well-being of the people… That was the major aim. The health of the people was deteriorating. Their well-being, their welfare … So, that's why this thing came on board. (INTU7; Local Government Representative)

At the forefront of this concern at local and national level, was a need to protect young people's health. There were reports from communities and in the media, of children and adolescents purchasing sachets which were cheap and widely available(Laing & Laing (DUO3), 2015). At national level, in the preface to the NACP, and the Ministry of trade official statement from 2016 the national ban was justified as "a bid to address the challenges of excessive consumption and abuse, especially among the youth" (2016, p. 11)(2016, p. 11).

> the sachet waragi [waragi refers to gin] first of all was too cheap, and even a child in school would buy the waragi, buy the product and even move with it in class and because it was soft polythene, you could not easily see, you could not detect. (INTU14; National Government)

Another concern was to protect the public against consuming the untested (and sometimes tainted) content of sachets. A national government interviewee expressed "*people were packing sachets which had a lot of adulterations and … chemicals"* (INTU13). In a local report deaths were mentioned which were considered to have resulted from sachet consumption prior to the ban: "the decision followed a series of deaths across the country attributed to adulterated spirits packaged in sachets"(Laing & Laing (DUO3), 2015, p. 22).

Nearly half of the interviewees across district and national level mentioned that the bans were motivated by concerns around social harm and violence.

> [the goal was] one, improve the health of the people by stopping them from consuming this alcohol. Two, reduce the domestic violence. (INTU6).

Overall, both the local and national ban were conceptualized as solutions to address the high accessibility, availability, and affordability of alcohol.

> Alcohol sachets were almost everywhere… even in the smallest shops so and it was so cheap…it was so cheap that even at 200 shillings [$0.05] one could get alcohol. Also, the packaging because it was packaged in such way that…it was even 50mls or something like that, that one, you just pocket it and go.(INTU1; NGO National)

The process of policy transfer from district level to national level

In this section, we apply step 2, 3 and 4 of Jensen's framework (formation/formulation; internalization and contextualization of policy transfers).

The formulation of the Gulu district sachet ban

The Gulu sachet ban (contained in the ordinance) was promulgated by the Local Government Authorities, the District Council and the Licensing committee, the local police (DUO4; DUO5). It clearly stated:

> A person shall not sell, distribute, consume or otherwise deal in alcoholic drinks packaged in plastic sachets, or any other plastic packaging… Alcoholic drinks sold, distributed or consumed within the district must be packaged in glass bottles that contain no less than 250 millilitres. (DU04, p.10)

This ban was well publicized through the media (press, TV, and radio). It was also strongly supported by civil society coalitions; for instance, women's groups boycotted shops selling sachets (DU3).

> We went to inform the people about the ordinance; We went from sub-county to sub-county. (INTU9-District Government)

> The women themselves who were paying a very high price because of this alcohol abuse, the women [in Gulu]organized themselves and they said they were boycotting buying things from shops that were selling alcohol in sachets. (INTU1-NGO National)

Some local business owners in the district also embraced the ordinance, agreeing not to sell sachets. Where they agreed, they were given tags to display, indicating that alcohol sachets were not sold in their shops.

> We developed 'no sachets waragi' tags. And we [were] coordinating with shop owners. … When you agree with us that you don't want to sell sachets, we give you that tag and we put it at the door. Indicating that there are no sachets. (INTU8-Local Government Representative)

However, one of the documents we reviewed mention some early opposition from the industry (Laing & Laing (DUO3), 2015) and a District Government participant mentioned "*we had pockets of resistance but it didn't last when we moved out to check on compliance which was after two months",* pointing to swift resolution after the ban was issued in the district in 2016.

Internalization and contextualization: how the district ban became a national ban

In terms of the content of the policy banning sachets, it is important to note that the Gulu district ordinance was internalized by the and the NACP, in that both used very similar wording, and both focused on a minimum allowed packaging size for alcohol. The ordinance, which came first, stated that alcohol must be

packaged "in glass bottles that contain no less than 250 millilitres"(2016)(2016)". The NACP similarly affirmed the "ban the sale of alcohol in sachets and small packages setting lowest volume to be not less than 250 mls (for spirits), 750 mls for wines and 330 mls for beers."(2019)(2019). When contextualized at national level, the regulation added other minimum sizes, set at different levels for different types of alcohol products, with products sold below those limits being clearly banned from manufacture and sale (whether packaged in plastic or glass).

Most of our interviewees were clear that the Gulu District ban inspired the National ban, as sachets (and their harmful use) grew into a nationwide concern.

> "*Gulu actually implemented it first but the concern was a country wide concern… the boda bodas [motorbike taxis] were having issues, the school children were having issues, and the general public were having issues…There was also a growing market so, every factory, every small manufacturer was packing their alcohol in those sachets… we are very grateful to the Gulu municipality and the [traditional] leaders then who actually took it up, they didn't wait for the [national] government to come up with a national thing and they just started it… …[so] we were not going to wait for every little district or community and it was a nationwide outcry so then in May 2019 that's when the [national] ban was actually made*. "(INTU5-National Government representative)

Some of the policy actors, such as members of Parliament, who are elected by people in their Districts but sit in the National Parliament, became strong advocates of a national ban and thus intermediaries in the local to national policy transfer.

> *"I was told [in the District] that actually they are sipping sachets of waragi, so I said we must fight against … so fortunately I was elected and got to parliament and … we started talking about banning the Sachet waragi, so it became a big discussion even up to cabinet level and gladly that was handled."* (INTU 14; National Government- Parliamentarian)

> *"MPs were mentioning how their people [in their districts] are dying because of alcohol actually…the process of the [national] ban originated from a hot debate in parliament which led into the ban* "(INTU16, National Government)

The above quotes show how the National Government perceived that district level concerns were being brought upstream to the Parliament and felt the need to adopt the policy at national level.

NGOs and civil society advocacy coalitions (which operated at both district and national levels) also supported this upstream policy move.

> "*We said Gulu has led the way … it is actually possible that you go and benchmark and appreciate what Gulu has done and see how that can be replicated*" (INTU1; National NGO)

However, the internalization and contextualization of this policy transfer was neither quick nor straightforward, for two main reasons. Firstly, there were disagreements initially between some National Ministries (e.g. Health and Trade). The Ministry of Trade and Industry (who issues regulations via the Bureau of Standards)was in favor of a phasing out of sachets production; in that spirit, they entered into an agreement with alcohol manufacturers. This is fully documented in their press release of November 2016, which mentions a "*dialogue with the members of Uganda Alcohol Industry Association*". MTIC gave manufacturers until September 2017 to phase out sachets production and entered into a Memorandum of Understanding with the UAIA to initiate a process of certification for alcohol producers with UNBS (Ministry of Trade Industry and Cooperatives (DUO11), 2016). A large proportion of our interviewees also confirmed that the alcohol manufacturers had asked for a transition period following the 2016 MTIC statement, and that this delayed the national ban significantly.

> *"During the days before the [national] ban, we saw the people from the industries, the manufacturer, they were really trying to plead for time, they were asking 'give us time'"* (INTU16; National Government).

> *"They [alcohol manufacturers] called it transitional [the phase out], implying that they had packed so many [sachets], they were going to make a lot of losses but also for them to migrate to the bottles, they needed to buy the technology, the machines which were very expensive. So, between 2016, 2017, 2018 there was a lot of lingering"*(INTU4, National NGO)

Secondly, and related to the above, the local to national transfer was delayed due to some of the national actors fundamental opposition to the idea of a ban, especially early on. A few of our participants believed that this was because these actors' own interests, which were tied to the production or sale of alcohol.

> "*They [national policymaker's name] were actually against it… totally against it [the ordinance]… but we stood our ground as Gulu District Local Government and say, "no," that is our position*" (INTU12, District Government)

> *"These ordinances and by-laws they met a lot of resistances because some of the leaders apart from using alcohol during their campaigns they actually run businesses; alcohol businesses they sell alcohol themselves. So, …they first ask themselves, "how does it affect me, how is it going to affect my business, I'm going to close my business?"* (INTU1, National NGO)

Conversely, NGOs and civil society coalitions, as well as some parliamentarians played a key role as intermediaries in the local to national sachets ban. Over half of our participants reported that NGOs dedicated their own resources and continued efforts to supporting a national ban after Gulu issued its own (some were also involved in the drafting of the NACP).

> *" We were part of the processes, we engaged… we had a stakeholders meeting where we had the parliamentary committee on NCDs, we went in there, we talked to them, discussed the importance of banning alcohol in sachets, I mean the accessibility, the availability issues and also, we had lived experiences "* (INTU1-National NGO)

Ultimately, the Ministry of Health's arguments, supported by sustained efforts from the NGOs and civil society as well as champion parliamentarians, prevailed, as a participant explained "*the Ministry of Health was doing it, … we had a number of stakeholder meetings; we had a number of them right from the time of 2017, 2018, throughout until it was passed"* [INTU03, National Government).

The operationalization of the district and national alcohol sachet bans

The 5th step of the Jensen's framework is 'operationalization,' more commonly known as implementation, took similar shapes in Gulu as it did nationally. At the local level, the Gulu district ordinance granted authorized officers the powers to inspect premises, vehicles, and locations suspected of violating the sachet ban, and to take alcohol samples for analysis, as well as verify licenses. Violators faced penalties including fines up to 40,000 Ugandan shillings [$10], imprisonment for up to six months, destruction of prohibited sachets, and potential license suspension or cancelation for noncompliance (Gulu District local government-(DUO4), 2016). Early on, there were challenges in the implementation. A document we reviewed which reflected on the early phases of enforcement by the local Government office describing challenges, such as the non-adoption of a ban by neighboring districts (which made control difficult), insufficient enforcement personnel available to monitor nighttime activities, and poorly defined penalties for disobeying the ban (The Office of the District Chairperson-(DUO5), 2023). However these challenges were overcome, and the local ban was successfully implemented.

At the national level, the Government set up a multisectoral task force committee to oversee the enforcement of the national ban. The first meetings of the multi-agency task force included the MTIC, UNBS, the Uganda Revenue Authority (URA), and the Uganda Police Force (DU07). However, it was the Uganda National Bureau of Standards (UNBS) who led the enforcement on the ground (DU08). The effectiveness of the multisectoral task agreement and actions were confirmed by several interviewees. Several of the documents we reviewed described the enforcement modalities that followed the national sachet ban. For ease of reference, these are summarized in Table 3.

Once the total and final national ban was issued, the enforcement was described by our interviewees as complete; a National Government representative

Table 3. Implementation reports by UNBS for the national ban on sachets.

Source document	Details of the enforcement actions
DU06- Operational plan (Multi-Sectoral Task Force, led by UNBS; Sept 2019)	Outlines the strategy of the Task Force to enforce the ban on sachets under 200ml. The strategy covers upcoming inspections, seizures, and documentation. Post-operation actions include debriefing, evidence handling, report compilation, and public awareness campaigns through media; a destruction plan for seized goods and a needs assessment to identify resource or logistical gaps to improve future enforcement.
DU07- Report (UNBS Surveillance Department ; Sept 2019)	This is the report of the first official meeting of the Multi-Sectoral Task Force (members present were UNBS, URA, Police, UMA, and alcohol manufacturers); they discussed enforcement strategies, alcohol abuse issues, and regulation challenges. Discussions emphasized equitable treatment between formal and informal manufacturers of alcohol sachets and the modalities of a two-week joint operation plan. A budget was mentioned to ensure coordinated enforcement.
DU08- Operational Report (UNBS Surveillance Department; Oct 2019)	This report summarizes UNBS enforcement of the MTIC directive banning alcoholic spirits in sachets and small containers. It presents data on factory inspections, machinery sealing, and seizure of contraband from multiple locations across Uganda. Approximately 5,930 litters of illegal spirits worth 50 million UGX [$13,735] were confiscated from 38 factories (e.g., distillery and breweries).
DU09- Operational Report (UNBS Surveillance Department ; Oct 2019)	This second report describes the first joint enforcement operation by Uganda's Multi-Sectoral Task Force on two Plazas in Kampala; Ten shops were inspected, with banned products totaling 415 liters and valued at 7.4 million UGX [$2000]. The report notes media participation and police security. Recommendations stressed inter-agency coordination, clear institutional roles, and prosecution of offenders to reinforce compliance and sustain long-term public health protection efforts.
DU10- Inspection report (UNBS Surveillance Department ; Mar 2021	This later inspection report was in response to a complaint against an alcohol manufacturer. UNBS inspectors, found no production activities but alcoholic beverages including beer in crates, alcoholic kombucha of various brands, and alcoholic beverages packed in volumes less than 200mls (sachets) contrary to the MTIC directives.

described it as "completely controlled"(INTU03) whilst a representative from a national NGO stated:

> *"To the best of my knowledge I haven't seen alcohol in sachets because after the ban I remember I used to follow in different communities and I would go and keep on picking those sachets myself as evidence that the ban is not fully operational but for, now years have passed and I have not really seen any sachets"* (INTU1-National NGO).

Similarly at the local level in Gulu, our participants confirmed that the sachets could no longer be found (sold or manufactured) in their communities ("Ever since they were banned, I have never seen them"(INTU11-Local Government); "in the end the sachets were completely confiscated"(INTU12-Local Government).

By the time we conducted our data collection in 2023, all our participants confirmed that, to their knowledge, alcohol sachets could no longer be found in Uganda.

Discussion

Main findings of the study

Our paper offers an in-depth retrospective case study analysis of the process of district to national policy transfer of the ban of alcohol sachets in Uganda. Uganda's decentralized system of government enabled Gulu District to enact an ordinance that included a ban on alcohol sachets in 2016. This was driven by public health concerns over the contribution of alcohol sachets to alcohol affordability and availability, and harms. The transfer of the ban from district to national was slow, owing to disagreements among ministries around a total ban or a phase out. Some politicians and the alcohol industry also opposed a ban, and this delayed the process. Eventually, the Ministry of Health and the strong wave of support from civil society prevailed, and a total national ban was finalized in 2019. Both bans were successfully enforced. Policy processes can happen over many years, involving multiple actors at local and national levels, influencing factors, and events that are non-linear in nature. Policy processes often move back and forth between ideation, contestation, formulation, and implementation as new evidence, actors' power and interests evolve over time (Buse, K., Mays, N., Walt, 2012; Gilson et al., 2018). Our paper shows how, while slow, the policy content and ideas transferred from local to National level in Uganda and influenced each other.

What is already known on the topic in Africa and why this is relevant?

There have been significant concerns about the contribution of alcohol sachets to heavy consumption and related alcohol harms in Uganda, especially in relation to young people and other vulnerable groups (Bonnevie et al., 2020; Otim et al., 2019; Smart et al., 2021). Similar concerns have been raised across Africa, where alcohol sachets are commonplace (Arasi & Ajuwon, 2020; Salimu & Nyondo-Mipando, 2020; Uny et al., 2025). Malawi banned sachets in 2017 for the same reasons (Uny et al., 2025). Other countries, including the Ivory Coast, Zambia, and Tanzania have taken the same steps in banning sachets from sale and manufacture. (Kasirye, 2023). Therefore, this remains a live issue for Africa. In November 2025, the Nigeria National Agency for Food and Drugs Administration (NAFDAC) issued a new ban on sachets and small plastic bottles of less than 200mls (NAFDAC, 2025). This followed a previous ban announced in 2024, which was postponed due to lobbying and protests by alcohol producers and the Manufacturers Association of Nigeria (NAFDAC, 2024; Nwafor, 2024).

Sachet bans have been described as policy successes, in that they eliminate a harmful product from the market. But they are also contested policy actions. This paper shows how manufacturers (UAIA) in Uganda pleaded with MTIC after the Gulu ban, to allow for a phase out of the sachets in order to change production, delaying a national ban by a few years. In our separate case study paper for Malawi, we demonstrated how the alcohol manufacturers and plastics manufacturers repeatedly used legal injunctions and challenges to delay the national ban of sachets for a number of years (Uny et al., 2025). Such tactics form part of what Mitchell et al. call "regulatory capture" by the alcohol industry, where they may permeate governmental institutions and legislative processes, yielding influence and becoming dominant actors in decision-making processes (2025). Such strategies have also been highlighted in a number of other papers in Africa (Bertscher et al., 2018; Mwagomba et al., 2018; Parry, 2010), but our papers are, to our knowledge, the first relating these strategies to the sachet bans policies specifically. The lessons we draw from these two papers offer contextualized evidence for other countries in the region contemplating bans or currently implementing similar bans.

Moreover, our paper adds to the literature by showing that policy processes are often supported by strong advocacy coalitions and NGOs and can be successful

when they align around public health protection goals (Uny et al., 2025). In this case study in Uganda, we show that both district level NGOS and national coalitions mobilized and sustained their efforts overtime, aided by some parliamentarians, who bridged both local and national levels. Particularly noteworthy in our findings is the role of women's groups in supporting the district ban, including through economic boycotts, and from traditional leaders and church groups (Laing & Laing (DUO3), 2015). Other papers equally show that policy transfers are typically supported by networks, and intermediaries operating across levels, who bridge the grassroots and policy spheres (Odoch et al., 2022; Ogden et al., 2003). For instance, Odoch et al's review of global policies to African countries context, show that transfers depend on strong transnational or domestic networks and intermediary actors who connect international organizations (and their policies) with local communities and national governments (where policies align with their agenda) (2022). Gilson et al's policy reader in Low- and middle-income countries shows that civil society organizations often help place issues onto policy agendas, that community movements and advocacy coalitions create policy momentum from below, and that mid-level actors (such as district managers, researchers, NGOs) can serve as mediators between communities and formal state institutions(2018). In Africa, there remains a gap in our understanding of the key role that traditional leaders and local authorities (including those who can enact bylaws and ordinances) can play in controlling the availability of alcohol. Chiefs and traditional authorities leader, for instance, are closest to their communities, and have a strong voice. They also form part of the administrative and government structure in some African countries, further situating them as potentially key players in enacting alcohol availability in their communities, and protecting public health.

What this paper adds

In terms of intermediaries in the upstream policy process, our paper highlights the role of parliamentarians, as brokers of local to national alcohol policy transfers. Intermediaries in the policy process have received more interest of late. Eitan et al. defines them as actors who can "translate abstract policy goals into actionable strategies, resolve conflicting interests, transfer knowledge across different sectors and scales, and facilitate policy coordination and collaboration in complex institutional environment" (Eitan et al., 2025).; for others they are also seen as 'linkage agents' who may interpret evidence and facilitate engagement between evidence producers and decision makers (e.g. think tanks or knowledge translation platforms). In the case of the Uganda sachets bans, some Parliamentarians played a strong role as intermediaries transferring knowledge and policy action from local to national level. In fact, the National Alcoholic Control Bill, which aimed to turn the NACP into legislation in 2024, was proposed by parliamentarians, rather that Government representatives as is usually the case. More research on the role of parliamentarians in alcohol policy transfers is therefore warranted.

Papers which detail local to local, or local to national (upstream) alcohol policy transfers are few. To our knowledge, they have been limited to the Global North mainly, offering less contextual relevance for Africa. For example, Gavens et al.'s qualitative study describes stakeholder experiences of alcohol policy transfer between local authorities in England. It describes processes of "policy copying, emulating, hybridization, and inspiration" between those (Gavens et al., 2019). Lesch and McCambridge similarly describe horizontal transfers in learning around minimum unit (MUP) price from Scotland to Wales. The authors show that although Welsh policymakers did not copy the policy wholesale, they learned from Scotland's legal, and political experience around MUP, particularly around evidence use, stakeholder engagement, and framing MUP as a public health measure (Lesch & McCambridge, 2023).

To our knowledge, our paper is the first to describe a local to national alcohol policy transfer in Africa. We applied the six phases from the Jensen et al.'s framework (2017) to increase the theoretical relevance. We showed that in terms of policy conceptualization, there was an alignment between the local and national rationales for the ban as a key policy option to protect public health from the widespread availability and accessibility of alcohol. In terms of formation (formulation), we demonstrated that the concept of bans and their modalities were similar at both levels. Regarding internalization, we clearly showed that the Gulu ban directly inspired the national ban. The contextualization from local to national ban was a slow process, which involved resolving different disagreements around its operationalization. In Gulu the vision was a complete, immediate ban, whereas some actors at national level favored a transitional approach to minimize industry impact at first, which led to some delays. In terms of implementation, enforcement took similar forms at local and national level. Finally, the sixth phase the Jensen framework, the evaluation of policy performance, has not been completed for the sachet

ban in Uganda, neither by Government nor by local research. Only one recent paper, which was a repeated cross-sectional observational study with data from one hundred food and beverage retail establishments in two urban districts in 2019, collected 3 months after the national ban, found that there was a significant reduction in sachets availability post-ban (Smart et al., 2021). In this paper, although we can attest to the implementation outputs from our documentary evaluation (around seizures of products and enforcement and market withdrawal) but we cannot attest to the public health impact of this particular policy, which require a full evaluation, including of any potential unintended consequences of this policy on availability.

Limitations

Recall could have been a limitation for this study as the bans (especially the district ban) were enacted a while ago; However, this did not seem problematic for our interviewees, and this was mitigated by the triangulation of interviews with documentary data. We only had scope to study the local ban in the Gulu ordinance (in terms of time and funding); however, it would have been useful to study other resolutions and bylaws in other districts such as Kitgum District and other areas. This could have enhance our knowledge on local-to-local transfer of policies, which is an under researched area. A full evaluation of the impact of this policy was beyond the scope of this study. This was a small exploratory qualitative study and to fully evaluate the policy impact and any unintended consequences of the ban, a larger mixed design study would be necessary to undertake a full retail monitoring survey of products available after the ban, and some cross-sectional surveys in rural and urban contexts. In an upcoming paper, we report on the focus groups we conducted in the same RAPSSA study which explored the replacement products which are now consumed, since the sachets are no longer available.

Conclusion

This case study demonstrates that local policy innovation, supported by strong coalitions, can successfully influence national level alcohol control measures. The transfer of the alcohol sachet bans from the Gulu District to national level in Uganda. The Ugandan experience offers valuable lessons for other countries seeking incremental approaches to alcohol policy reform, especially where more comprehensive legislation faces political opposition and resource constraints. This paper offers a rare analysis of upstream alcohol policy in Africa. It shows how decentralized governance structures in Africa—such as District government, local Governments, and traditional authorities—can serve as 'alcohol policy laboratories' allowing local authorities to experiment with policy solutions that can later inform wider national approaches.

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Ethics statement

The study received ethical approval from the University of [removed for the review process] GUEP8077), the Research Ethics Committee at [removed for the review process] (SPH-2023-394) and [removed for the review process] (HS3130ES).

Author contributions

CRediT: **Paskari Odoi**: Formal analysis, Writing – original draft, Writing – review & editing; **Cissie Namanda**: Conceptualization, Data curation, Formal analysis, Investigation, Methodology, Project administration, Validation, Visualization, Writing – original draft, Writing – review & editing; **Marsha Orgill**: Conceptualization, Formal analysis, Funding acquisition, Methodology, Project administration, Supervision, Validation, Visualization, Writing – original draft, Writing – review & editing; **Nazarius Mbona Tumwesigye**: Conceptualization, Data curation, Funding acquisition, Investigation, Project administration, Resources, Software, Supervision, Validation, Writing – original draft, Writing – review & editing; **Gemma Mitchell**: Conceptualization, Formal analysis, Methodology, Validation, Writing – original draft, Writing – review & editing; **Denview Magalasi**: Data curation, Formal analysis, Investigation, Project administration, Validation, Visualization, Writing – original draft, Writing – review & editing; **Benjamin Kaneka**: Conceptualization, Data curation, Funding acquisition, Investigation, Project administration, Resources, Software, Supervision, Validation, Writing – original draft, Writing – review & editing; **Linda Bauld**: Conceptualization, Funding acquisition, Writing – review & editing; **Niamh Fitzgerald**: Conceptualization, Funding acquisition, Methodology, Validation, Writing – review & editing; **Charles Parry**: Conceptualization, Funding acquisition, Methodology, Project administration, Supervision, Validation, Writing – review & editing; **Isabelle Uny**: Conceptualization, Data curation, Formal analysis, Funding acquisition, Investigation, Methodology, Project administration, Supervision, Validation, Visualization, Writing – original draft, Writing – review & editing.

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The authors report there are no competing interests to declare.

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Data availability statement

All the data for this paper is contained in the paper itself.

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