

Pursuing profit at the expense of public health?

Case studies of alcohol industry activity in sub-Saharan Africa

Foreword

This report “Pursuing profit at the expense of public health? Case studies of alcohol industry activity in sub-Saharan Africa” is an important milestone for FORUT. It would not have been possible without the researchers and collaborators from the University of Stirling’s Institute for Social Marketing and Health, Makerere University and the Southern Africa Alcohol Policy Alliance.

The first chapter in this report documents the alcohol industry’s CSR and how it is being used as a marketing tool by the alcohol industry in various countries in sub-Saharan Africa. The two case studies featured in this report are published in two international peer-reviewed scientific research journals.

Since 2018 FORUT has, together with the Norwegian civil society organisations IOGT, Juvente and Juba, been advocating for the Norwegian Government Pension Fund Global (The Fund) to stop investing in alcohol companies. We have had limited success with this. In 2024, the Fund invested approximately 138 billion NOK in alcohol companies worldwide.

When FORUT commissioned the University of Stirling to conduct research on the activities of alcohol companies in which The Fund invests in sub-Saharan Africa, we aimed to provide evidence to demonstrate the unethical practices of the alcohol companies in which the Fund invests, with the hope that The Fund and the Council of Ethics would investigate these.

Given this report and The Fund’s view on responsible corporate policy engagement, we believe that The Fund should check if the policy engagement activities of the alcohol companies really align with their stated policies.

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Ida Oleanna Hagen
Secretary General, FORUT

Acknowledgements

Executive Summary and Part 1:

This project was commissioned and funded by FORUT. The executive summary and Part 1 were written by Dr Gemma Mitchell and Dr Isabelle Uny, Institute for Social Marketing and Health, University of Stirling. We'd like to thank Benjamin Anabila, Alcohol Policy Alliance-Ghana; Andrew Lubega, Uganda Youth Development Link; Richard Tinkasimire Baguma and Daphine Mary Namwero, Uganda Alcohol Policy Alliance; Cissie Namanda and Claire Biribawa, Makerere University; and those who wish to remain anonymous, who contributed to the crowdsourcing initiative on which Part 1 is based. We'd also like to thank Dr Benjamin Hawkins for providing comments/feedback on an earlier draft of Part 1, and Prof. Niamh Fitzgerald for her role in co-acquiring the funding for the wider project and support throughout.

Reflexivity statement

The idea for the wider project was developed by the University of Stirling and commissioned by FORUT. Potential case studies were sought from experts across the continent. Following discussions with potential collaborators, University of Stirling and FORUT agreed two case studies. Reflexivity statements for each case study are provided in the papers cited below. Due to the volume of information received, Dr Mitchell verified the examples of industry activity with those who contributed to the crowdsourcing initiative, and along with Dr Uny wrote these up as Part 1.

Suggested citation for Part 1: Mitchell, G. and Uny, I. (2025) 'Pursuing profit at the expense of public health? Examples of alcohol industry activity across six countries in sub-Saharan Africa based on the crowdsourcing method', FORUT

Part 2:

Citation: Mitchell, G., Siwela, P., Goldstein, S., and Maker-Diedericks, A. (2025) Alcohol industry involvement in the delayed South Africa Draft Liquor Amendment Bill 2016: a case study based on freedom of information requests, *Globalization and Health* 21, 11
<https://doi.org/10.1186/s12992-025-01097-5>

Part 3:

Citation: Purves, R., Auma, V., Mitchell, G. and Tumwesigye, N. (2025) Alcohol sports sponsorship in Uganda: A case study analysis, *International Journal of Alcohol and Drugs Research*, <https://doi.org/10.7895/ijadr.557>

Executive summary

Sub-Saharan Africa has been identified as a key market for growth for the alcohol industry for many reasons, including high proportions of abstainers and heavy episodic drinkers (among drinkers) and weak alcohol control policies (1-4). Global retail sales for alcohol in 2017 were estimated to be worth over \$1.5 trillion (15.8 trillion NOK), with sales and profits concentrated among a small number of transnational companies (5). In line with other health-harming industries, the size and scale of these companies support marketing, corporate social responsibility (CSR), and other activity dedicated to preventing policies that conflict with commercial interests (6-8).

The Norwegian Government Pension Fund Global (The Fund) is the world's largest state-owned global investment fund. Its objective is to secure funding for future generations of Norwegians (9). FORUT has advocated for The Fund to stop investing in alcohol companies, but with little success; in 2024, The Fund invested approximately 138 billion NOK in alcohol companies worldwide (up from 133 billion NOK in 2021). FORUT commissioned the University of Stirling to conduct research on the activity of alcohol companies in which The Fund invests in sub-Saharan Africa, placing industry activity in its global context and revealing the connections between the alcohol industry and other health-harming industries, such as tobacco.

Via a crowdsourcing initiative, we found:

- **61 examples of alcohol industry activity across six countries (Burundi, Ghana, Sierra Leone, South Africa, Uganda, and Zimbabwe).**
- **Food donations and promotions; sponsorship of cultural events; sports sponsorship; health-related donations/activity; education; and entrepreneurship-related competitions were the key activities documented.**
- **Education programmes and entrepreneurship-related competitions identified here appeared to be mostly directed towards young people.**
- **Partnerships with charities and government agencies were common across the documented activities.**

An in-depth case study of alcohol industry policy activity in South Africa¹ focused on the heavily delayed Draft Liquor Amendment Bill 2016. The Bill proposed new rules to limit alcohol advertising, control availability, and hold retailers and manufacturers accountable for harm caused by breaking the regulations. To-date, the Bill has not progressed through the legislative process. We found:

- **Activity by 14 alcohol industry organisations related to the Bill between 2016 and 2022, when the Bill was being reviewed before it reached parliament.**
- **Community representation was low in the meetings we studied where the Bill was discussed, compared to industry, labour, and government.**
- **Early "regulatory capture" allowed the alcohol industry to influence the Bill's review. Industry funded socio-economic assessments that slowed the Bill's progress, and during the Covid-19 pandemic used legal threats and donations to push for self-regulation rather than stronger measures to address alcohol harms.**

An in-depth case study of sports sponsorship in Uganda² found:

- **Sports sponsorship was a common practice in Uganda with multiple alcohol brands sponsoring a wide range of sports, including football, basketball and golf.**
- **Social media posts and news reports emphasised the financial contribution made by the alcohol industry, positioning it as central to the sustainability of sports in the country.**
- **The sports sponsorship identified in this study often portrayed alcohol brands as a key part of Ugandan culture, using elements of heritage and history in their marketing.**

The activities documented here suggest alcohol companies play a central role in the economic, social, and political life in the countries included in the study. Much of this activity follows the same tactics used by other health-harming industries, like tobacco, to prevent effective policies from being implemented globally (6, 7).

¹ Mitchell, G., Siwela, P., Goldstein, S., and Maker-Diedericks, A. (2025) Alcohol industry involvement in the delayed South Africa Draft Liquor Amendment Bill 2016: a case study based on freedom of information requests, *Globalization and Health* 21, 11 <https://doi.org/10.1186/s12992-025-01097-5>

² Purves, R., Auma, V., Mitchell, G. and Tumwesigye, N. (2025) Alcohol sports sponsorship in Uganda: A case study analysis, *International Journal of Alcohol and Drugs Research*, <https://doi.org/10.7895/ijadr.557>

Part 1: Alcohol industry activity in six countries across sub-Saharan Africa

Background

Alcohol is a leading preventable risk factor for disease burden globally and in 2021 was the largest risk factor for disease burden among people aged 25 to 49 (10). Recent study has led experts to argue that no amount of alcohol is safe for health (11), with an estimated 4.1% of all new cancers in 2020 attributed to alcohol (12). Despite high abstention rates, particularly among women, people in low and middle-income countries experience greater harm per litre of alcohol consumed than those in high-income countries (13, 14), with per capita consumption of alcohol and rates of heavy episodic drinking rising steadily in recent years (15). Sub-Saharan Africa experiences a higher burden of alcohol-related harm than the global average (3), which has been linked to poor socio-economic conditions in large parts of the region (3, 14).

There is international agreement on how to address alcohol harms globally: recommendations by the World Health Organization (WHO) SAFER initiative should be adopted, which include restrictions on availability and marketing, raising prices, and addressing drink driving (16). In practice, alcohol policy implementation across the continent has been uneven, with only a few countries, including South Africa, Malawi, and Kenya having a multi-sectoral policy framework in place to address alcohol harms (3). Most countries do not implement the WHO recommendations, which researchers have suggested could be due to a lack of resource to implement policies where they exist, and industry interference to prevent effective policies being passed (3).

FORUT has linked with partners across the region, including in Malawi, Zambia, Sierra Leone, Nigeria, Senegal, Liberia, Ghana, the Gambia, South Africa, Lesotho, Zimbabwe, Botswana, and Namibia. FORUT commissioned the University of Stirling to conduct research on alcohol industry activity in sub-Saharan Africa. We asked:

- 1) What types of alcohol industry marketing and CSR activities are taking place across sub-Saharan Africa?
- 2) Which alcohol industry actors are involved, and which groups are being targeted by their activities?
- 3) What are the similarities and differences between these case studies and alcohol industry activity globally?

Methods

Study design

We used an exploratory case study methodology to document examples of marketing and CSR activities in sub-Saharan Africa. The case study approach is useful when there is a need to obtain an in-depth appreciation of an issue in its real-life context (17). It has been used in previous research on the commercial determinants of health (18) and is particularly helpful where the topic is not suitable for an experimental study and relevant data sources are diverse. We focused on transnational alcohol companies The Fund invests in and affiliated organisations, including subsidiaries, trade associations, so-called 'social aspects' and public relations organisations (SAPROs), and PR companies.

To identify case studies, we used an adapted version of the crowdsourcing method: 'an online, distributed, problem-solving, and production model that uses the collective intelligence of networked communities for specific purposes' (19 p.179). The method has many different applications for public health, including knowledge discovery and management (19), although it is usually applied in high-income countries (20). It has also been used to identify health-harming industry activity during the Covid-19 pandemic (18).

Data collection

We identified a preliminary list of potential countries and examples of industry activity using University of Stirling and FORUT contacts. Once this confirmed the approach was feasible, we used an adapted version of the crowdsourcing method to collect a longlist of potential case studies. FORUT and University of Stirling contacts across the continent were emailed in December and January 2023 to request examples. A pro forma was used to collect information regarding:

- country;
- alcohol industry actor involved;
- nature of activity;
- start and end dates;
- if the case study has been studied previously;
- capacity of research lead; and
- methodological expertise required to study further.

A preliminary scoping phase to assess the potential value for advocacy and feasibility of each study was conducted between February and March 2023, which included online meetings and email exchanges with experts who responded to our call. Examples were excluded if the industry actor involved was unclear or received no known investment from The Fund; examples were too generic to be studied here (e.g. 'cheap alcohol production'); we could not obtain substantiating data (in the form of government websites, media reports, or industry websites and reports); or the examples had been previously studied. We created a longlist of examples received and the following criteria were applied to guide the selection of the final case studies: value of the case for advocacy; access/feasibility; capacity; and expertise required. Methods used to study the two chosen in-depth case studies are reported in parts two and three. The examples are summarised below in line with previous reports of industry activity using the crowdsourcing method (18). During the final verification process, we added examples where relevant if they met our criteria (for example, where a newspaper article reported another example of industry activity).

Below, examples of alcohol industry activity obtained via a crowdsourcing initiative are summarised. These findings provide a 'snapshot' of industry activity in the countries in which collaborators are based, rather than a comprehensive account of all industry activity across the continent. Two further in-depth case studies were conducted with expert collaborators in South Africa and Uganda and are published in *Globalization and Health* and the *International Journal of Drug and Alcohol Research* respectively.

Summary of examples of alcohol industry activity received

We received a total of 84 examples of industry activity from experts based in nine countries. Following exclusions and additions, a total of 61 examples from experts in six countries were included in the study (see Table 1). Two of those examples were chosen for in-depth case study and are therefore reported in parts two and three. We categorise the remaining 59 examples into seven themes (see Table 2). All 59 examples relate to AB InBev, Diageo, and Heineken³.

Table 1: Submitted examples of industry activity

Country	Number of examples received	Exclusions	Additional examples identified during verification	Total included
Benin	1	1	0	0
Burundi	11	4	0	7
Ghana	3	0	4	7
Liberia	5	5	0	0
Malawi	13	13	0	0
Sierra Leone	20	7	0	13
South Africa	1	0	2	3
Uganda	20	2	2	20
Zimbabwe	10	0	1	11
Total	84	32	9	61

Table 2: Number of included examples by theme

Country	Theme						
	Food, festivals, and culture	Environment / agriculture	Sports sponsorship	Health	Education/ entrepreneurship	Road Safety	Science and policy
Burundi	4	1	2	-	-	-	-
Ghana	2	1	-	2	1	-	1
Sierra Leone	3	4	2	2	2	-	-
South Africa	2	-	-	-	-	-	1*
Uganda	3	5	3*	3	3	3	-
Zimbabwe	1	3	4	2	1	-	-
Total	15	14	11	9	7	3	2

*One chosen for in-depth case study

³ <https://web.archive.org/web/20250326095950/https://www.nbim.no/en/investments/all-investments/#/> accessed 26th March 2025

Food, festivals, and culture

This section includes examples of food donations and promotions, and sponsorship of activities related to cultural life. Alcohol industry CSR initiatives globally have previously been documented to include emergency humanitarian aid, arts, and cultural activities (21). Recent study in Nigeria highlights how music festival sponsorship can generate brand capital and encourage alcohol consumption among young people (22). There is no evidence that CSR activities reduce alcohol harms (7, 21).

Food donations and promotions were reported in two countries. Following the November 2021 fuel tank disaster in Freetown, **Sierra Leone** where at least 99 people were reported killed and 100 injured⁴, Sierra Leone Brewery Limited⁵ reportedly donated 100 bags of 25kg white rice and 1,000 crates of Maltina (a non-alcoholic beverage made by the brewery)⁶. Two parliamentary constituency representatives, a Community Tribal Head and a Pastor and Youth Leader were reported to be present at the donation event⁷. In **Uganda**, Nile Breweries Limited⁸ reportedly formed a partnership with a food delivery service in September 2021, where, when buying beer, consumers could win food and water vouchers⁹. The company launched the partnership as part of a “Global Smart Drinking Week” and during the first week of the United Nationals General Assembly¹⁰, with the reported claim that “lucky winners will get free water and food coupons on their NBL beer brands purchases”¹¹.

Other food and culture-related activity was also reported. In **Zimbabwe**, Delta Corporation Limited¹² sponsored the annual music event ‘Castle Lager National Braai [a social barbeque] Day’ with a litre of Castle lager (a Delta Corporation Limited brand) reportedly included with

⁴ <https://web.archive.org/web/20250324125719/https://www.reuters.com/world/africa/fuel-tanker-blast-sierra-leone-capital-kills-least-91-says-morgue-2021-11-06/>, accessed 30th May 2024

⁵ Sierra Leone Brewery Limited is a subsidiary of Heineken
<https://web.archive.org/web/20240529170211/https://slbrewerylimited.com/about/>, accessed 29th May 2024

⁶ <https://web.archive.org/web/20240530121549/https://thecalabashnewspaper.com/to-sympathize-with-affected-families-of-the-wellington-fire-disaster-sl-brewery-donates-1000-crates-of-maltina-can-100-bags-of-rice-to-old-wharf-community/>, accessed 30th May 2024

⁷ <https://web.archive.org/web/20240530121549/https://thecalabashnewspaper.com/to-sympathize-with-affected-families-of-the-wellington-fire-disaster-sl-brewery-donates-1000-crates-of-maltina-can-100-bags-of-rice-to-old-wharf-community/>, accessed 30th May 2024

⁸ Nile Breweries Limited is a subsidiary of AB InBev [/web/20240530093316/https://www.nilebreweries.com/who-we-are/](https://web/20240530093316/https://www.nilebreweries.com/who-we-are/), accessed 30th May 2024

⁹ <https://web.archive.org/web/20240530122053/https://mugibson.com/nile-breweries-jumia-smart-drinking/>, accessed 30th May 2024

¹⁰ <https://web.archive.org/web/20240530122053/https://mugibson.com/nile-breweries-jumia-smart-drinking/>, accessed 30th May 2024

¹¹ <https://web.archive.org/web/20240530122509/https://www.foodbusinessafrica.com/nile-breweries-jumia-champion-smart-drinking-behavior-hydrating-eating-while-indulging-in-alcohol/>, accessed 30th May 2024

¹² AB InBev is reported to hold a 40% stake in Delta Corporation Limited

<https://web.archive.org/web/20240529162546/https://www.inside.beer/news/detail/zimbabwe-delta-corporation-to-invest-usd50-million-in-new-production-capacity/>, accessed 22nd May 2024; <https://web.archive.org/web/20250325145534/https://delta.co.zw/our-partnerships-abinbev/>, accessed 25th March 2025

all paid tickets in 2023¹³. In 2021, marketing of the event included Covid guidance alongside a promotion stating “buy 3 castle lagers and you could win big in this year's promotion”¹⁴.

In **South Africa**, South African Breweries¹⁵ partnered with a food delivery service to feature a menu of selected dishes¹⁶. It was reported that “this is part of SAB’s commitment to the industry social compact with government that focuses on reducing the harmful consumption of alcohol within three areas: reducing drink driving, reduce underage drinking and reduction of binge drinking”¹⁷.

There were also reports of industry involvement in other areas of cultural life. In **Sierra Leone**, Sierra Leone Brewery sponsored a reality TV show in 2022¹⁸ and the company was nominated for “best CSR in entertainment” in the National Entertainment Awards 2019¹⁹. In **Uganda**, a Gulu Elephant Monument in Gulu city was sponsored by Uganda Breweries Limited²⁰ and erected in 2022, with a Uganda Breweries spokesperson quoted as stating “this monument which will be a unique identifier from which the people of Acholi can draw pride in their cultural heritage. The elephant also holds great significance to our business as the official logo of our beloved brand, Tusker, which celebrates 100 years of existence this year”²¹.

In **Ghana**, CLUB premium lager (an Accra Brewery²² brand) was described as “a truly national icon through the consistent use of adinkra symbols, the Ghanaian national flag, a timeless tagline, and adoption of “Chale” [friend]”²³. Accra Breweries reported that “for all major festivities in Ghana, there is a Smart Drinking campaign to engage all of our consumers”²⁴.

¹³ [The Herald - Breaking news;](https://web.archive.org/web/20250325130925/https://www.herald.co.zw/all-set-for-castle-lager-national-braai-festival/) <https://web.archive.org/web/20250325130925/https://www.herald.co.zw/all-set-for-castle-lager-national-braai-festival/> accessed 31st August 2024

¹⁴ [Castle Lager Zimbabwe on X: "ATTENTION! Drumroll please 🥂 The Castle Lager Braai Paden/Edladleni is back. To take part in the promotion 1: Buy 3 Castle Lagers from participating outlets. 2: Take a clear picture of your receipt. 3: Send receipt on WhatsApp number 0785 552 324 and stand a chance to win big! https://t.co/ZEWoiKWX3S" / X](https://t.co/ZEWoiKWX3S) [not archivable] accessed 31st August 2024

¹⁵ South African Breweries is a subsidiary of AB InBev https://web.archive.org/web/20240530134428/https://www.ab-inbev.com/content/dam/universaltemplate/ab-inbev/News/Press%20kit/ABI_FS16_South%20Africa.pdf accessed 30th May 2024

¹⁶ <https://web.archive.org/web/20240530134608/https://www.foodbusinessafrica.com/sab-encourages-responsible-drinking-through-launch-of-ghost-kitchen-serving-pre-and-post-groove-meals/> accessed 30th May 2024

¹⁷ <https://web.archive.org/web/20250325132648/https://www.foodbusinessafrica.com/sab-encourages-responsible-drinking-through-launch-of-ghost-kitchen-serving-pre-and-post-groove-meals/> accessed 31st August 2024

¹⁸ <https://web.archive.org/web/20240530164748/https://thecalabashnewspaper.com/ex-housemates-bag-10000-new-leones-from-sl-brewery/> accessed 30th May 2024

¹⁹ <https://web.archive.org/web/20240530164855/https://thecalabashnewspaper.com/as-it-gears-for-2019-festive-season-sierra-leone-brewery-nominated-best-csr-for-nea-2019/> accessed 30th May 2024

²⁰ Uganda Breweries Limited is a subsidiary of East African Breweries Limited, in which Diageo is a majority shareholder <https://web.archive.org/web/20240529163306/https://www.ugandabreweries.com/info/about-us> accessed 29th May 2024

²¹ <https://web.archive.org/web/20240530135812/https://www.independent.co.ug/lyec-first-elephant-monument-unveiled-in-gulu-city/> accessed 30th May 2024

²² Accra Brewery is a subsidiary of AB InBev <https://web.archive.org/web/20240529172819/https://www.inside.beer/news/detail/ghana-ab-inbev-to-open-new-25-million-bottling-plant/> accessed 29th May 2024

²³ <https://web.archive.org/web/20240530140748/https://www.africaoutlookmag.com/company-profiles/1538-accra-brewery-plc> accessed 30th May 2024

²⁴ <https://web.archive.org/web/20240530140748/https://www.africaoutlookmag.com/company-profiles/1538-accra-brewery-plc> accessed 30th May 2024

In **Burundi**, Brarudi S.A.²⁵ sponsored several music events. In 2021, the company reportedly sponsored the music competition 'Tagata na Primustar' (Primus is a brand owned by the company) with cash prizes available²⁶. Similarly, the company was reported to sponsor a 'Primusic musical competition', which aims to “develop and promote young Burundi talent”²⁷. Brarudi also sponsored the TAYAYA festival in 2022, where cash prizes were available for what is described as Burundian talents in traditional music and dances²⁸. Also in **Burundi**, Heineken sponsored the 'Friends of Amstel' festival in at least 2021²⁹ 2022³⁰ and 2023³¹. In 2024, Friends of Amstel continued, including in **South Africa**, where a competition was held to win prizes and tickets to the event. To access prizes, it appears that individuals had to purchase an Amstel beer³².

Environment and agriculture

This section includes reports of industry agriculture, environment and sanitation initiatives. These activities are at times reported to occur simultaneously. Researchers note that industry involvement in local agriculture “increases the companies’ role in local economies and in government development projects” (1 p.555). SAB Miller (now part of AB InBev) has been previously reported as stating “our significant tax (excise) contribution gives us a place at the table’ and boasts that its local sourcing initiatives help government create jobs. In its view, large investments in infrastructure also earn it a place in policy making” (1 p.558).

In **Zimbabwe**, Delta Corporation Limited reported working “directly with over 11,000 commercial and smallholder farmers under contract schemes who produce over 100% of [their] barley and sorghum grain requirements” and added “the company runs a sorghum contracting scheme as the primary source of its sorghum grain requirements for Chibuku and Eagle Lager. A total of 9 500 hectares was cultivated under the 2021/2022 sorghum contract, yielding 12500 tonnes, enough to cover the business’ malt requirements”³³. A M.A.D. campaign launch by the same company in 2017 had the reported aim of raising awareness of

²⁵ Brarudi S.A. is a subsidiary of Heineken [/web/20240530095937/https://brarudi.bi/index.php](https://web/20240530095937/https://brarudi.bi/index.php) accessed 30th May 2024

²⁶ <https://web.archive.org/web/20240530141422/https://www.burunditimes.com/uplifting-burundi-artists-in-high-gear/> accessed 30th May 2024

²⁷ <https://web.archive.org/web/20240530142020/https://www.newsdirectory3.com/burundi-eco-la-primusic-a-repris/> accessed 30th May 2024

²⁸ <https://web.archive.org/web/20240530143050/https://brarudi.bi/index.php/actualite/704-tayaya-festival> accessed 30th May 2024

²⁹ <https://web.archive.org/web/20240530142520/https://leafrinique.co.za/megastar-wizkid-to-headline-the-friends-of-amstel-sa-virtual-festival/> accessed 30th May 2024

³⁰ <https://web.archive.org/web/20250325144904/https://brarudi.bi/index.php/actualite/712-friends-of-amstel> accessed 25th March 2025

³¹ <https://web.archive.org/web/20250325145130/https://www.brarudi.bi/index.php/actualite/799-friends-of-amstel-2023> accessed 31st August 2024

³² <https://web.archive.org/web/20240530143335/https://justtrimmings.co.za/friends-of-amstel-is-back-first-stop-cape-town/> accessed 30th May 2024

³³ <https://web.archive.org/web/20240522155234/https://www.delta.co.zw/wp-content/uploads/2023/07/Delta-Corporation-Limited-Annual-Report-2023.pdf> p.29; p154 accessed 22nd May 2024

waste management³⁴. In related activity, Delta Corporation Limited ran a Boost Programme³³. This collaboration with a not-for-profit organisation that runs youth development programmes has been previously reported (23); the examples provided show the partnership was ongoing to at least 2024. Recent activity included competitions for university students to create recycling initiatives, with the aims of the programme reported as “to raise awareness on the importance of the 3 Rs (Reducing, Reusing and Recycling) in contributing towards a cleaner and more sustainable environment; to empower young people and women to run technologically thriving enterprises; and to enhance Delta Corporation Limited’s publicity across Zimbabwe through social media and awareness campaigns”³³.

In **Uganda**, Uganda Breweries was involved in various reforestation efforts, which were often reported to include partnerships with government agencies and charities. For example, Uganda Breweries described its ROOTS campaign as “an initiative that brings together the private sector and other non-state actors to support the Government’s initiative to replenish Uganda’s forest cover. The campaign’s main target is to plant 40 million trees across the country by 2025”³⁵. Regarding the Lake Victoria Basin reforestation, Diageo reported that “as a longtime partner of the Ministry through the National Forestry Authority and having already recently restored over 200 hectares of forest cover within the Lake Victoria Basin catchment area, Uganda Breweries was approached to lead the private sector participation in the campaign”³⁶. Uganda Breweries was also reportedly involved in a partnership to replant trees in Navugulu Central Forest Reserve in Mpigi District in 2015³⁷. Separately, in 2018 Uganda Breweries reported that they commissioned 16 boreholes worth UGX 480 million in the Acholi subregion³⁸. A local official was reported to have attended the launch event in 2023³⁹. A reported joint initiative by Uganda Breweries and a charitable trust led to the commissioning of a sanitation block in Buganda as part of the Uganda Breweries “water of life” programme⁴⁰.

In **Sierra Leone** in 2020, Sierra Leone Brewery partnered with an NGO to help build three solar mechanised borehole water supply systems in three communities within Freetown, an

³⁴ <https://web.archive.org/web/20240522155407/https://csrnetworkzimbabwe.co.zw/top-beverage-manufacture-delta-takes-a-lead-in-championing-sustainability-issues-in-zimbabwe/> accessed 22nd May 2024;
<https://web.archive.org/web/20240531192245/https://www.chronicle.co.zw/delta-corporation-launches-smart-drinking-and-moderation-innovation-challenge/> accessed 31st May 2024

³⁵ <https://web.archive.org/web/20240529185111/https://www.ugandabreweries.com/sustainability/environment/reforestation-initiative> accessed 29th May 2024

³⁶ <https://web.archive.org/web/20240529185351/https://www.diageo.com/en/careers/life-at-diageo/2021/uganda-roots-initiative-an-interview-with-david-onyango> accessed 29th May 2024

³⁷ <https://web.archive.org/web/20240529185704/https://www.monitor.co.ug/uganda/news/national/nmg-joins-drive-to-restore-forest-1613720b> accessed 29th May 2024

³⁸ <https://web.archive.org/web/20250325150925/https://sunrise.ug/business/201804/uganda-breweries-announces-800-million-scholarship-and-water-projects-for-northern-uganda.html> accessed 25th March 2025

³⁹ <https://web.archive.org/web/20240529165712/https://www.ugandabreweries.com/news-room/uganda-breweries-commissions-ugx-480m-water-project-northern-uganda> accessed 29th May 2024

⁴⁰ <https://web.archive.org/web/20240529164632/https://www.ugandabreweries.com/sustainability/water-life-programme> accessed 29th May 2024

action reportedly welcomed by the Minister of Water Resources⁴¹. In 2022, Sierra Leone Brewery and the Heineken Africa Foundation launched a “WASH Project for Calaba town community worth €70,585 and a Gravity Water Supply system project for the people of Wellington worth over €89,000”⁴². The launch events were reportedly attended by local members of parliament⁴². In 2019, it was reported that Sierra Leone Brewery use of local sorghum has encouraged local farmers to increase production⁴³. In 2021, a company employee was reported to state that “to meet the demand of sorghum needed by [the company] to support production, the CREATE (Community Revenue Enhancement through Agriculture and Technological Extension) project is working with more farmers and with SLARI [Sierra Leone Agricultural Research Institute] on new varieties, training, financing and planting materials to help increase their yields”⁴⁴.

In **Burundi**, the Heineken Africa Foundation reported making available €5,000,000 (approx. 57,171,000 NOK) to support efforts to deal with the COVID-19 pandemic; this was also spread across several other countries⁴⁵. In 2018, a water charity was reportedly awarded a grant from Heineken Africa Foundation to build the Nyakaniga-Gatongo clean water system in the Songa region (a system serving 3,400 villagers)⁴⁶.

In **Ghana**, Accra Brewery ran various sustainability programmes that included partnerships with government agencies. For example, the company stated it has “partnered with the Ministry of Environment, Science, Technology and Innovation (MESTI) on the National Plastic Waste Management campaign across Ghana, to enable the development of a vibrant and market-driven domestic recycling industry”⁴⁷.

Sports sponsorship

This section includes examples of sports sponsorship across four countries. International evidence demonstrates that sports teams and organisations are used by alcohol companies to promote their brands (24, 25); that sports sponsorship influences consumers, including

⁴¹ [/web/20240529190134/https://www.wvi.org/stories/sierra-leone/providing-water-most-vulnerable-world-water-day-sierra-leone](https://www.wvi.org/stories/sierra-leone/providing-water-most-vulnerable-world-water-day-sierra-leone) accessed 29th May 2024

⁴² <https://web.archive.org/web/20250325151358/https://thecalabashnewspaper.com/sl-brewery-haf-launch-new-water-sanitation-projects-worth-over-le1-8-billion/> accessed 29th May 2024

⁴³ [/web/20240531171527/https://thecalabashnewspaper.com/sierra-leone-news-brewery-rated-high-for-rolling-out-its-local-content-policy-corporate-social-responsibility/](https://thecalabashnewspaper.com/sierra-leone-news-brewery-rated-high-for-rolling-out-its-local-content-policy-corporate-social-responsibility/) accessed 31st May 2024

⁴⁴ [/web/20240531171855/https://thecalabashnewspaper.com/sl-brewery-enforced-local-production-of-more-sorghum-and-boosts-farmers-capacity-to-support-local-content-policy/](https://thecalabashnewspaper.com/sl-brewery-enforced-local-production-of-more-sorghum-and-boosts-farmers-capacity-to-support-local-content-policy/) accessed 31st May 2024

⁴⁵ [/web/20240529190423/https://www.theheinekencompany.com/newsroom/the-heineken-africa-foundation/](https://www.theheinekencompany.com/newsroom/the-heineken-africa-foundation/) accessed 29th May 2024

⁴⁶ [/web/20240529190530/https://www.gazellefoundation.org/blog/2018/9/3/saving-lives-through-access-to-clean-water-update-on-heineken-africa-foundation-grant](https://www.gazellefoundation.org/blog/2018/9/3/saving-lives-through-access-to-clean-water-update-on-heineken-africa-foundation-grant) accessed 29th May 2024

⁴⁷ [/web/20240529190641/https://www.africaoutlookmag.com/company-profiles/1538-accra-brewery-plc](https://www.africaoutlookmag.com/company-profiles/1538-accra-brewery-plc) accessed 29th May 2024

young people (26, 27); and that there is a positive association between exposure to alcohol sport sponsorship and alcohol consumption, including among young people and adult sportspersons (28) (see also Part 3).

In **Zimbabwe** in 2024, Delta Corporation Limited announced a three-year sponsorship deal with the Premier Soccer League reportedly worth \$3,390,000 (approx. 35,655,000 NOK)⁴⁸. This includes sponsoring the Championship via the Castle lager brand, and sponsorship of the Chibuku Super Cup⁴⁹. Chibuku is a beer brand that is produced by Delta Corporation Limited in Zimbabwe. In 2023, Carling Black Label (a Delta Corporation Limited brand in Zimbabwe) sponsored the national pool tournament. It was reported that “to qualify for the tournament, each participant shall be required to purchase four pints/cans or four quarts of a Carling Black Label beer”⁵⁰. Delta Corporation Limited used different branded products to sponsor different sporting events. For example, Zambezi lager sponsored the Kariba Invitational Tiger Fishing Tournament in 2022 and was also a sponsor of the Zimbabwe Men’s 7s Rugby team⁵¹.

In **Uganda**, Nile Special beer (owned by Nile Breweries) sponsored the Uganda Sports Press Association Awards in at least 2023 and 2024⁵². The company first sponsored the University Football League in 2012 (it is reported to now be sponsored by Pepsi)⁵³.

In **Sierra Leone** in 2023, Sierra Leone Brewery ran a “True Togetherness Inter-Community Football Gala Competition” with local communities for the 60th anniversary of the company, with small cash prizes provided⁵⁴. In 2016, the company reportedly donated SSL40,000,000 (approx. 2138 NOK) to the Central One Football Association league winner⁵⁵.

Brarudi is the official sponsor of the Primus League, a Burundian football league named after the Brarudi beer brand; at least one government official reported to attend the closing ceremony of the league⁵⁶. The company is also the official sponsor of the Viva Basketball League in **Burundi**⁵⁷.

⁴⁸ https://web/20240530085453/https://www.herald.co.zw/Delta_Corporation_Limited-beverages-unveil-us3m-psl-sponsorship-deal/ accessed 30th May 2024

⁴⁹ https://web/20240530085726/https://www.Delta_Corporation_Limited.co.zw/wp-content/uploads/2023/07/Delta_Corporation_Limited-Corporation-Limited-Annual-Report-2023.pdf accessed 30th May 2024 p.29

⁵⁰ <https://web/20240530090017/https://www.chronicle.co.zw/carling-black-label-pool-championships-start/> accessed 30th May 2024

⁵¹ https://web.archive.org/web/20240522155234/https://www.Delta_Corporation_Limited.co.zw/wp-content/uploads/2023/07/Delta_Corporation_Limited-Corporation-Limited-Annual-Report-2023.pdf accessed 21st April 2024, p.23

⁵² https://web/20240530154806/https://www.newvision.co.ug/category/sports/athletes-receive-monthly-uspa-awards-NV_170220
<https://web/20240530094150/https://nbssport.co.ug/2024/04/13/jacob-kiplimo-named-uspa-nile-special-sports-personality-of-march-2024/>
both accessed 30th May 2024

⁵³ <https://web/20240530093659/https://kawowo.com/2022/11/22/university-football-league-to-reward-decades-cream/> accessed 30th May 2024

⁵⁴ <https://web/20240530094538/https://aynnews.com/sierra-leone-brewery-limited-is-celebrating-60-years-of-existence/>

<https://web/20240530094402/https://slbrewerylimited.com/60th-anniversary/> both accessed 30th May 2024

⁵⁵ accessed 25th March 2025

⁵⁶ <https://web/20240530095501/http://ffb.bi/soiree-de-gala-primus-ligue-burundi-2022-2023/> accessed 30th May 2024

⁵⁷ <https://web.archive.org/web/20250325152457/https://brarudi.bi/index.php/actualite/676-la-brarudi-via-sa-marque-viva-a-signe-un-contrat-de-4-ans-avec-la-federation-de-basket-ball-du-burundi> accessed 25th March 2025

Health-related donations

This section includes industry donations of health equipment or supplies. These are in addition to the previously documented activity (18) during the pandemic by the alcohol and other health-harming industries. There is no evidence that CSR activities reduce the harms from the products health-harming industries produce (7, 21).

In **Uganda** in 2020 Uganda Breweries joined with other private companies to provide 450 health workers in neo-natal and maternal units with “essential household goods and items”, with a government official reported to be present at the handover⁵⁸. In 2022, the same company donated a Universal Anaesthesia Machine to a health centre; that handover was reported as taking place at the Ministry of Health offices⁵⁹. In July 2021, Nile Breweries reportedly donated 20 Oxygen Cylinders to a hospital in Masindi⁶⁰.

In **Zimbabwe**, Delta Corporation Limited reportedly provided hand sanitizer, personal protective equipment and non-alcoholic beverages to emergency workers⁶¹ and also partnered with the health department to run vaccination programmes for Delta Corporation Limited employees⁶².

Similarly, **Sierra Leone** Brewery has reportedly made donations via the Heineken Africa Foundation to a health centre in Wellington since 2010, including maternity equipment, computers, an ambulance in 2011 and another ambulance during the Ebola crisis in 2015⁶³. Later donations to rebuild the same centre, which industry reports totalled approx. 1,676,000 NOK received support from a parliamentary representative⁶⁴. In 2020, the same company donated approx. 80,368,000 NOK of personal protective equipment, sanitizer, gloves, soap, buckets and non-alcoholic beverages to a national health association⁶⁵.

In **Ghana** in 2014, Accra Brewery was reported to partner with a German development agency “to commemorate 'Foetal Alcohol Spectrum Disorder (FASD) awareness day” by holding a

⁵⁸ [/web/20240529194142/https://eagle.co.ug/2020/12/21/ubl-joins-private-companies-to-gift-maternal-health-workers-at-kawempe-hospital/](https://eagle.co.ug/2020/12/21/ubl-joins-private-companies-to-gift-maternal-health-workers-at-kawempe-hospital/) accessed 29th May 2024

⁵⁹ [/web/20240531091508/https://nilepost.co.ug/news/147884/ubl-female-staff-donate-shs100m-maternal-equipment-to-mayuge-health-centre](https://nilepost.co.ug/news/147884/ubl-female-staff-donate-shs100m-maternal-equipment-to-mayuge-health-centre) accessed 31st May 2024

⁶⁰ <https://web.archive.org/web/20250325153048/https://www.masindi.go.ug/news/nile-breweries-donate-hospital-equipment-masindi> accessed 25th March 2025

⁶¹ [/web/20240530083434/https://www.Delta Corporation Limited.co.zw/Delta Corporation Limited-corporation-covid-19-response/](https://www.Delta Corporation Limited.co.zw/Delta Corporation Limited-corporation-covid-19-response/) accessed 30th May 2024

⁶² [/web/20240530083704/https://www.Delta Corporation Limited.co.zw/wp-content/uploads/2021/11/Delta Corporation Limited-World-E-Newsletter-November-2021.pdf](https://www.Delta Corporation Limited.co.zw/wp-content/uploads/2021/11/Delta Corporation Limited-World-E-Newsletter-November-2021.pdf) p.6 accessed 30th May 2024

⁶³ [/web/20240530083847/https://thecalabashnewspaper.com/brewery-commissions-wellington-community-health-center-worth-over-le1-2b/](https://thecalabashnewspaper.com/brewery-commissions-wellington-community-health-center-worth-over-le1-2b/) accessed 30th May 2024

⁶⁴ [/web/20240530083847/https://thecalabashnewspaper.com/brewery-commissions-wellington-community-health-center-worth-over-le1-2b/](https://thecalabashnewspaper.com/brewery-commissions-wellington-community-health-center-worth-over-le1-2b/) accessed 30th May 2024

⁶⁵ [/web/20240530084156/https://thecalabashnewspaper.com/as-fight-against-covid-19-intensifies-sl-brewery-donates-personal-protective-equipment-to-medical-dental-association/](https://thecalabashnewspaper.com/as-fight-against-covid-19-intensifies-sl-brewery-donates-personal-protective-equipment-to-medical-dental-association/) accessed 30th May 2024

“health enlightenment clinic” at a hospital in Accra to educate expectant mothers on the effects of alcohol on the unborn child⁶⁶. During the COVID-19 pandemic, Accra Brewery reportedly sponsored the distribution of 10,000 bottles of hand sanitiser across Ghana⁶⁷. This included to a clinic in Accra, where a maternity ward in the same hospital was reported to receive quarterly donations from the company⁷⁰.

Education and entrepreneurship

This section covers industry education programmes and donations, and entrepreneurship-related competitions. These topics are combined in one section because they at times overlap, with entrepreneurial-related competitions targeted at university students, for example. There is widespread agreement in the scientific community that alcohol education programmes should not be used to replace more effective policies to address alcohol harms, such as availability, price, and marketing (16). Education programmes have also been described as a way for industry to displace and usurp public health globally (7). The entrepreneurship-related competitions we identified appear to be mostly directed towards young people. Studies of CSR activities in low and middle-income countries have previously been noted as targeting young people and their parents (21).

In **Zimbabwe**, Delta Corporation Limited ran the Delta Corporation Limited Schools Assistance programme, which the company described as “support[ing] communities across marginalised areas with financing for infrastructure projects”⁶⁸. This included funding two classroom blocks and toilet facilities for a primary school in 2018; the completion event was reportedly attended by the Minister of Industry and Commerce⁶⁹. The company also reports providing a bursary scheme for ‘A’ Level and university students, claiming “we have 100 students benefiting from the programme from ‘A’ Level up to university this year and these students have been selected with the help of the Ministry of Primary and Secondary Education”⁷³. Delta Corporation Limited also reportedly partnered with an NGO to provide equipment to schools affected by Cyclone Idai⁷³. As part of the Delta Corporation Limited-Boost programme documented above, a “smart drinking and moderation innovation challenge”

⁶⁶ [/web/20240530084430/https://www.ghanaweb.com/GhanaHomePage/NewsArchive/ABL-holds-health-clinic-for-expectant-mothers-325616](https://www.ghanaweb.com/GhanaHomePage/NewsArchive/ABL-holds-health-clinic-for-expectant-mothers-325616) accessed 30th May 2024

⁶⁷ [/web/20240529190641/https://www.africaoutlookmag.com/company-profiles/1538-accra-brewery-plc](https://www.africaoutlookmag.com/company-profiles/1538-accra-brewery-plc) accessed 29th May 2024

⁶⁸ [/web/20240530103435/https://www.Delta Corporation Limited.co.zw/Delta Corporation Limited-schools-assistance-programme-dsap/](https://www.Delta Corporation Limited.co.zw/Delta Corporation Limited-schools-assistance-programme-dsap/) accessed 30th May 2024

⁶⁹ [/web/20240530103435/https://www.Delta Corporation Limited.co.zw/Delta Corporation Limited-schools-assistance-programme-dsap/](https://www.Delta Corporation Limited.co.zw/Delta Corporation Limited-schools-assistance-programme-dsap/) accessed 30th May 2024

was reported as running from 2024-26, including a “leadership bootcamp” with university students from across the country⁷⁰

Uganda Breweries reported providing 30 scholarships for “young, academically talented but financially challenged students from the farming communities in Acholi sub region in Northern Uganda”⁷¹. The Uganda Breweries Skills for Life programme has reportedly awarded over 200 university scholarships across East Africa over 17 years, with 40 of them in Uganda⁷⁵. In 2021, Nile Breweries sponsored an “Inter-University Smart Drinking Challenge”, which was a competition (with small cash prizes) for university students to submit ideas on how to promote “responsible drinking”⁷². The Asst Youth & Children Ministry of Gender, Labour and Social Development was described as a guest of honour at the competition launch event⁷³. In July 2022, Nile Breweries launched a second “Be a Millionaire” entrepreneurship campaign/competition, the aim of which is described as “making a difference in the lives of young entrepreneurs by offering them technical and financial support”⁷⁴. The Minister of Trade and Assistant Commissioner of Youth and Children Department at the Ministry of Gender, Labour and Social Development were reported to attend the televised final, with the winner reportedly receiving UGX 3,000,000 (approx. 8279 NOK)⁷⁵.

In **Sierra Leone** in 2022, Sierra Leone Brewery co-launched the “Below 18? Zero Tolerance Against Alcohol” campaign. It was reported that “200 children/pupils from 20 schools in Freetown benefitted from a workshop and training on Underage Drinking Prevention”⁷⁶.

Road safety

This section covers alcohol industry activity related to road safety in Uganda. A comprehensive study of the alcohol industry’s involvement in road safety globally found that ‘the alcohol industry acknowledges that drink-driving is an issue but argues for solutions that would limit impact on sales, akin to the message “drink-but do not drive”’ (29 p.1328).

⁷⁰ [/web/20240531192245/https://www.chronicle.co.zw/Delta-Corporation-Limited-corporation-launches-smart-drinking-and-moderation-innovation-challenge/](https://www.chronicle.co.zw/Delta-Corporation-Limited-corporation-launches-smart-drinking-and-moderation-innovation-challenge/) accessed 31st May 2024

⁷¹ <https://web.archive.org/web/20240530105841/https://www.ugandabreweries.com/news-room/uganda-breweries-commissions-ugx-480m-water-project-northern-uganda> accessed 30th May 2024

⁷² [/web/20240530104431/https://www.nilebreweries.com/smart-drinking/marketing-advertising-and-sales/](https://www.nilebreweries.com/smart-drinking/marketing-advertising-and-sales/) accessed 30th May 2024 Nile Breweries (NBL) Announces Top 15 of Smart Drinking Ideas - Campus Bee accessed 31st August 2024

⁷³ [/web/20240530111423/https://www.nilebreweries.com/university-students-buzz-as-nile-breweries-nbl-launches-the-inter-university-smart-drinking-campaign/](https://www.nilebreweries.com/university-students-buzz-as-nile-breweries-nbl-launches-the-inter-university-smart-drinking-campaign/) accessed 30th May 2024

⁷⁴ [/web/20240530113859/https://www.nilebreweries.com/excitement-as-nile-breweries-launches-season-2-of-be-a-millionaire/](https://www.nilebreweries.com/excitement-as-nile-breweries-launches-season-2-of-be-a-millionaire/) accessed 30th May 2024

⁷⁵ [/web/20240530113802/https://www.nilebreweries.com/lira-youth-wins-be-a-millionaire/](https://www.nilebreweries.com/lira-youth-wins-be-a-millionaire/) accessed 30th May 2024

⁷⁶ [/web/20240530120152/https://slbrewerylimited.com/campaigns/](https://slbrewerylimited.com/campaigns/) [/web/20240530120339/https://thecalabashnewspaper.com/save-sl-sl-brewery-limited-holds-underage-drinking-prevention-workshop-for-pupils/](https://thecalabashnewspaper.com/save-sl-sl-brewery-limited-holds-underage-drinking-prevention-workshop-for-pupils/) both accessed 30th May 2024

In 2022, Nile Breweries launched the 'Ondaba' road safety campaign in **Uganda**, reporting that “the campaign was done in collaboration with the Ministry of Works and Transport, Uganda National Roads Authority, the Emergency Medical Services department at the Ministry of Health, the Uganda Police” and a national health association⁷⁷. As part of the campaign, the company reportedly donated two shelter tents to Uganda Traffic Police, made donations to a health centre in Mpigi, and donated a prosthetic leg to a road accident victim based in Njeru⁸¹. Uganda Breweries ran a 'Wrong Side of the Road' campaign, describing it as “part of our efforts to Promote Positive Drinking”⁷⁸, and between at least 2011 and 2015 ran a "Red Card Responsible Drinking Campaign” “with the aim of reducing the incidences of drink driving”⁷⁹.

Science

This section covers one example of science activity. The alcohol industry, like other health-harming industries, is known to intervene in science and policy to prevent policies that conflict with commercial interests (6-8).

In **Ghana**, a scientific article titled 'Analysis of the effectiveness of Corporate Social Responsibility in brand marketing with AAKER Brand Equity and Daisy Wheel Models' was published in the journal Technium and authored by an Accra Brewery and Ghana Water company employee. The authors conclude “the findings revealed that CSR programmes are community-focus initiatives, involves programmes on education as well as health programmes in developing communities. The study therefore concluded that CSR activities go a long way to build a solid brand identity and equity as in the case of [Accra Brewery]”⁸⁰.

⁷⁷ [/web/20240530144823/https://www.nilebreweries.com/smart-drinking/road-safety/](https://www.nilebreweries.com/smart-drinking/road-safety/)
accessed 30th May 2024

⁷⁸ [/web/20240530150249/https://www.linkedin.com/posts/ugandabreweries_wrongsideoftheroadug-activity-6907242046223183872-H9uw/?trk=public_profile_like_view](https://www.linkedin.com/posts/ugandabreweries_wrongsideoftheroadug-activity-6907242046223183872-H9uw/?trk=public_profile_like_view)
accessed 30th May 2024

⁷⁹ [/web/20240530145412/https://www.ugandabreweries.com/news-room/uganda-breweries-limited-re-kindles-red-card-campaign](https://www.ugandabreweries.com/news-room/uganda-breweries-limited-re-kindles-red-card-campaign)
accessed 30th May 2024

⁸⁰ [/web/20240530151221/https://techniumscience.com/index.php/socialsciences/article/view/6089](https://techniumscience.com/index.php/socialsciences/article/view/6089) accessed 30th May 2024

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PART 2

Alcohol industry involvement in the delayed South Africa Draft Liquor Amendment Bill 2016: A case study based on Freedom of Information requests

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RESEARCH

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Alcohol industry involvement in the delayed South Africa Draft Liquor Amendment Bill 2016: a case study based on freedom of information requests

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Abstract

Background South Africa is reported to have one of the highest per capita rates of alcohol consumption among drinkers globally, with alcohol harms exacerbating socio-economic inequalities in the country. The Draft Liquor Amendment Bill 2016 proposed new restrictions on alcohol advertising, availability, and liability of retailers and manufacturers for harm related to any contravention of the regulations. To date, the Bill has not progressed through the legislative process. The alcohol industry is known to use a diverse set of strategies to delay evidence-based policies globally.

Methods We aimed to explore Bill-related activity by industry within the National Economic and Development Labour Council, a multi-stakeholder forum that assesses socio-economic policies before they reach parliament. On 06 July 2023 we made a Request for Access to Record, using form two of the Promotion of Access to Information Act (PAIA), no. 2 of 2000 to the National Economic and Development Labour Council for access to minutes of all meetings, reports, and any other publications related to the Bill between January 2016 and December 2022. Informed by Ulucanlar et al's (2023) model and taxonomies of corporate political activity, we extracted data on industry Bill-related activity and thematically analysed key events, presented here as a narrative synthesis.

Results We identified activity by 14 alcohol industry organisations related to the Bill between 2016 and 2022. Industry representation on five National Economic and Development Labour Council-related committees identified between 2017 and 2021 facilitated their involvement in Bill-related discussions and supported access to other government departments. Community representation was low in all committees compared to industry, labour, and government. Industry funded two socio-economic assessments of the Bill in 2017 and 2022, despite an independent socio-economic impact assessment having already been completed. The 2017 report delayed progress of the Bill, and the 2022 're-evaluation' was more critical of the proposed measures, with the differing conclusions attributed to different methodologies. During the covid-19 pandemic, industry used a 'carrot and stick' approach of legal threats and donations to attempt to move towards self-regulation via a social compact. The National Economic and Development Labour Council confirmed in 2023 that the social compact was unsuccessful.

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Conclusions Early ‘regulatory capture’ gave the alcohol industry the opportunity to shape assessment of the Bill within the National Economic and Development Labour Council. Our findings are in line with previous studies on corporate influence on policy globally, and support calls for a reassessment of the role and proportion of industry representation within the National Economic and Development Labour Council locally.

Keywords Alcohol industry, Alcohol policy, South Africa, Corporate political activity, Policy formulation, Commercial determinants of health

Introduction

Sub-Saharan Africa has been identified as a key market for growth for the alcohol industry due to high abstention rates across most regions, high population growth and urbanisation, and weak uptake of World Health Organization (WHO) ‘best buy’ alcohol control policies [1–3]. Global retail alcohol sales in 2017 were estimated to be over \$1.5 trillion, with sales and profits concentrated in a small number of transnational companies [4]. The alcohol industry, like other health-harming industries such as tobacco, ultra-processed foods, and gambling, uses their extensive resources to oppose evidence-based policies to address the harms of their products, and promote self-regulatory options which support commercial interests but have little or no benefit for public health [5–9]. Although research on alcohol industry activity in sub-Saharan Africa has increased in recent years [for example, 10, 11–14], there remains a lack of research on commercial involvement in health policy in low and middle-income countries (LMICs), particularly in relation to the policy formulation process [10].

South Africa is reported to have one of the highest per capita rates of alcohol consumption among drinkers globally [15], with 62,000 adults dying from alcohol-attributable causes in 2015 [16]. This is despite high rates of abstention— in 2016, only approximately 20% of female and 50% of males were current drinkers [17]. Heavy episodic drinking is therefore a major problem, with a prevalence rate of 74% reported among male drinkers aged 15–19 in 2016 [15]. South Africa has been described as the most economically unequal country globally [18], with alcohol harms exacerbating the problem. A modelling study of alcohol-attributable mortality found 60% of all alcohol-attributable deaths occurred in the lower 30% of social strata [19]. Although the alcohol industry makes a significant contribution to the domestic economy via employment, output, and export earnings, the cost of alcohol harms has been estimated at -10-12% of the 2009 gross domestic product [20].

Alcohol is currently regulated in South Africa under the Liquor Act No. 59 of 2003 [21]. Any proposed changes to this and other policies are assessed by the National Economic Development and Labour Council (NEDLAC), a statutory body that is described as ‘the vehicle by which government, labour, business, and community organisations seek to cooperate, through

problem-solving and negotiation, on economic, labour and development issues, and related challenges facing the country’ [22]. The most recent attempt to update the legalisation is the Draft Liquor Amendment Bill 2016 (hereafter referred to as the Bill), which proposed new restrictions on alcohol advertising, availability, and liability of retailers and manufacturers for harm [23]. The changes include alcohol outlets not being allowed within 500m of schools among other public places; increasing the legal drinking age from 18 to 21; advertising restrictions on print media, television, radio, billboards, print media and other public areas except at site of sale; and placing liability on alcohol retailers and manufacturers for harm related to any contravention of the legislation. The Bill was gazetted (shared) for public comment in 2016. In 2017, an amended version of the draft Bill was circulated but not made publicly available. There were differences in this version; for example, proximity restrictions for the retail of alcohol within 500m of public places such as schools, places of worship, and residential areas were removed in the 2017 version, and the number of proximity restrictions for manufacturers and distributors were reduced [24]. Restrictions on marketing and advertising, raising the legal drinking age, and restrictions on distribution and supply to unlicensed premises remained the same [24]. Unless otherwise stated, we refer to the 2016 official, published version throughout. At time of writing the Bill has not progressed through the legislative process.

If implemented in full, the Bill could significantly reduce alcohol harms in South Africa. The Bill includes two of the WHO ‘best buy’ alcohol control policies (bans or comprehensive restrictions on alcohol; restrictions on alcohol availability) [15]. When the Russian Federation applied these policies, plus taxation and price increases, there was a 43% reduction in alcohol consumption between 2003 and 2016 [25]. This supported a drop in all-cause mortality of 39% in men and 36% in women between 2003 and 2018 [25]. There are few policy process studies in LMICs, in particular on policy formulation [10, 26]. A previous study shows that the alcohol industry was a key actor involved in the 2013 Draft Control of Marketing of Alcoholic Beverages Bill, which has also not been implemented [10]. Focusing on policy formulation can provide insight into strategies used by powerful industries in LMICs to prevent progress towards the adoption

and implementation of evidence-based policies [10, 26]. Media and advocacy groups' heavy criticism of an industry-funded report on the relationship between trauma admissions and temporary alcohol sales bans during the Covid-19 pandemic [27, 28], combined with NEDLAC's central role in assessing proposed legislation before it is introduced in parliament, led us to explore the extent of alcohol industry involvement in NEDLAC activity related to the Bill. Here, we provide a critical analysis of industry Bill-related activity within NEDLAC. Analysis of the wider policy formulation process related to the Bill is beyond the scope of the current study.

Methods

Design

We used an exploratory case study methodology to critically analyse alcohol industry activity within NEDLAC related to the Draft Liquor Amendment Bill 2016. The case study approach is useful when there is a need to obtain an in-depth appreciation of an issue, event or phenomenon of interest in its real-life context [29]. Critical social research acknowledges and centres the interrelationship between data, theory, pre-existing knowledge, and socio-political context [30] and has been used in previous studies of the relationship between governments and industry [31, 32]. We explore the extent to which alcohol industry activity within NEDLAC influenced progress of the Bill.

Freedom of information laws have been described as underutilised research tools [33] that are particularly helpful when studying public-private partnerships or relationships [31, 34]. Two objectives of the South Africa Promotion of Access to Information Act (PAIA), no.2 of 2000 are to 'promote transparency, accountability and effective governance of all public and private bodies [and] to assist members of the public to effectively scrutinize and participate in decision making by public bodies' [35]. Data received via such requests are by nature incomplete; as in previous studies using this method, we therefore supplemented these data with other publicly available information and published literature where possible [31, 36].

Data collection

On 06 July 2023 we made a Request for Access to Record, using Form 2 of the Promotion of Access to Information Act (PAIA), no. 2 of 2000 [35] to NEDLAC for access to minutes of all meetings including plenary sessions, working group meetings, task team meetings and sub-committee meetings, reports, studies, research papers, and any other publications commissioned or produced by NEDLAC on topics related to the Bill between January 2016 and December 2022. We also requested agreements, memoranda of understanding, and any other

forms of formal agreements entered by NEDLAC regarding the alcohol industry and correspondence, including letters, emails, faxes, and memoranda exchanged between NEDLAC and relevant stakeholders, such as government departments, trade unions, industry associations, and civil society organizations in relation to the Bill within those same dates. We received 56 documents from NEDLAC totalling 573 pages. These included meeting minutes, draft and final reports, letters, PowerPoint presentation slides, email correspondence, industry guidelines, and a webpage. We received only five documents related to 2017, and no documents covering 2018, 2019, or Jan-Jun 2020. Subsequently, on 23 November 2023 we made a second request to NEDLAC for documents during that period but received duplicates of documents previously sent and no new documents.

Data analysis

We drew on the READ approach [1] (Ready materials, 2) Extract data, 3) Analyse data; and 4) Distil findings) [37] to help organise the data, creating a Microsoft Excel file to screen the documents for duplicates and identify industry actors involved. Excluding duplicates led to a dataset of 43 documents totalling 477 pages. A large proportion of the data covered the second half of 2020 and the Covid-19 pandemic response.

The Ulucanlar et al. (2023) model and taxonomies of corporate political activity [5] outline both action and framing strategies that health-harming industries use to influence policy. The framing taxonomy outlines three frames (the policy actor; problems; and solutions), and the action strategy taxonomy outlines six actions (access and influence policy-making; use the law; manufacture support for industry; shape evidence to manufacture doubt; displace and usurp public health; and manage reputations to industry's advantage) used by health-harming industries globally to advance their interests [5]. Using this model, we focused on action strategies as this dataset gives insights into actions that may not be possible via other methods. We extracted all data on alcohol industry actors involved, the non-industry actors they interacted with, and dates and content of all events referred to within the dataset. We summarised each event, and subsequently identified key industry involvement across a timeline of Bill-related activity which we present here in a narrative synthesis [38]. Data extraction was independently conducted by two authors, and key events were coded by one author and reviewed by a second author. Data extraction from scientific reports was performed separately; due to resource limitations, we extracted conclusions and industry activity only from the reports. Disagreements about what should be included as key events and how they were coded were resolved as a team. An additional framing analysis of the NEDLAC report on the

Bill, which contained detailed industry perspectives [39] was conducted by one author and reviewed by a second author.

Co-author expertise on alcohol policy development in South Africa informed how the received dataset was verified and supplemented by other publicly available information. This included the NEDLAC website and annual reports, media reports, industry websites, and industry-funded reports. In line with previous studies using equivalent freedom of information requests [31, 40, 41], as data were in the public domain and there were no human participants, the study did not require ethical approval. Industry was referred to as ‘business’ throughout the dataset. For clarity, we use ‘industry’ to refer to the alcohol industry, except for quotes where the original use of ‘business’ is retained.

Results

We identified 14 alcohol industry groups in the dataset (see Table 1). Alongside industry membership of the NEDLAC Executive Council [42] and Trade and Industry Chamber [43], industry representation on five committees facilitated their involvement in Bill-related discussions (see Table 1). Much of the data relates to 2017, when a NEDLAC report on the Bill was produced [39] and 2020/21, when the pandemic response and policy in the form of a social compact appeared to take precedence over the Bill. We outline the mechanisms of contact between industry and other stakeholders regarding the Bill, industry activity related to the Bill during the Covid-19 pandemic, and the use of science by industry below.

Mechanisms of contact between industry, government, and other stakeholders

We identified five committees set up between 2017 and 2021 that facilitated or proposed to facilitate contact between industry, government, community, and labour representatives (see Table 2). Notably, industry representation was far higher than community representation in all committees where this information was available. Committee membership supported contact between industry and senior government officials during the pandemic. For example, the Minister of Health attended a NEDLAC meeting in December 2020, during which industry presented on self-regulatory measures in place to prevent a second wave of Covid-19. Even when industry representatives were not present, their role in the committees meant their input could be shared with senior government officials. For example, proposed measures to avoid a resurgence of Covid-19 were planned to be used as a basis for a National Joint Operational and Intelligence Structure (NATJOINTS) meeting in December 2020. A planned government meeting with

the President in August 2020 was also discussed by the NEDLAC rapid response task team (NRRTT), including to develop proposals to bring to that meeting, although there is no evidence that alcohol industry representatives attended. A meeting between the Minister of the Department of Trade, Industry and Competition (DTIC) and the NEDLAC rapid response task team was planned in July 2021 to ‘hear the views of the social partners on the liquor restrictions,’ although it is not known if this went ahead.

Industry shaping evidence to manufacture doubt

We identified two industry-funded assessments of the Bill, which were completed in 2017 and 2022 (see Table 3). This is in addition to the (previously reported) industry-funded research reports produced during the pandemic [55], when a social compact appeared to take precedence over the Bill.

The 160-page report evaluating the potential impact of the Bill in 2017 [56] was a response to a Department of Trade and Industry (DTI) socio-economic impact assessment (SEIAS) of the Bill (39 p1). Since 2015, all draft policies, Bills or regulations in South Africa must have a SEIAS [57], and the Department of Planning, Monitoring and Evaluation [DPME] granted approval for the Bill to proceed based on a completed SEIAS in June 2017 (39 p1). Yet, the NEDLAC task team concluded this was insufficient:

Although the SEIAS presented before the Task Team met the required guidelines of DPME and received the certification, the stakeholders at the NEDLAC Task Team were of the view that the SEIAS did not quantify job losses. While the parties agreed that the SEIAS document would not be replaced, it was agreed that NEDLAC would conduct the research to inform the deliberations of the NEDLAC constituencies.

(NEDLAC report on the Liquor Amendment Bill, November 2017, (39 pp.1–2))

When government sought to clarify the purpose of the additional research:

Business stated that the outcome of the research would better inform the Social Partners on the impact of the Bill and what could be done to mitigate the unintended consequences hence Business had indicated that it was willing to fund the research. Business reiterated that this would not be a [sic] Business research but a NEDLAC research funded by Business.

(Liquor Amendment Bill Task Team Meeting, 20th July 2017)

Table 1 Key alcohol industry organisations identified in the dataset

Alcohol industry actor	Example activity
Transnational alcohol companies	
AB InBev	NEDLAC Liquor Task Team member. Named party to a July 2020 version of a draft social compact* (as part of Beer Association of South Africa). See also South African Breweries
Diageo	Named party to a July 2020 version of a draft social compact (as part of South African Liquor Brand Owners Association)
Heineken	NEDLAC Liquor Task Team member. Named party to a July 2020 version of a draft social compact (as part of Beer Association of South Africa). See also Distell
Pernod Ricard	Named party to a July 2020 version of a draft social compact (as part of South African Liquor Brand Owners Association)
Subsidiaries of transnational companies	
Distell (acquired by Heineken in 2023)	NEDLAC Liquor Task Team member. Named party to a July 2020 version of a draft social compact (as part of South African Liquor Brand Owners Association)
South African Breweries (subsidiary of AB InBev since 2016)	In August 2020, government noted that: 'there's been a threat from SAB [South African Breweries] to withdraw the 2.5 million that they were going to invest in the sector on the basis of the fact that they were not able to trade'. Meeting minutes report that industry declined to rescind the withdrawal of the funds (NRRTT on the liquor industry meeting minutes, 24th August 2020). Named party to a July 2020 version of a draft social compact (as part of Beer Association of South Africa)
Social Aspects and Public Relations Organisations (SAPROs)	
The Association for Alcohol Responsibility and Education (Aware); formerly known as the Association for Responsible Alcohol Use (ARA) (funded by the alcohol industry [44]. Includes Diageo and Heineken board members) [45].	During discussion of the social compact, industry representatives proposed self-regulation measures could be implemented through Aware. Presented to NEDLAC IN February 2021 on the industry-wide response to the pandemic, including reported donations to the pandemic response
Trade associations	
Beer Association of South Africa (BASA) (represents Craft Brewers Association South Africa, Heineken South Africa, South African Breweries and United National Breweries) [46]	NEDLAC Liquor Task Team member. Named party to a July 2020 version of a draft social compact. One of three industry funders of a 2022 socio-economic assessment of the Bill [47]
National Liquor Traders Association (NLTA) (including/also known as Liquor Traders Association of South Africa (LTASA) National Liquor Traders Council (NLTC) and South African Liquor Traders Association (SALTA))	NEDLAC Liquor Task Team member. Named party to a July 2020 version of a draft social compact
South African Liquor Brand Owners Association (SALBA) (AWARE board member; Diageo and Heineken are executive members) [48]	NEDLAC Liquor Task Team member. One of three industry funders of a 2022 socio-economic assessment of the Bill [47]
Vinpro (wine industry)	Named party to a July 2020 version of a draft social compact. One of three industry funders of a 2022 socio-economic assessment of the Bill [47]
Wider industry groups	
Agricultural Business Chamber South Africa (Agbiz) (lists South Africa Wine as members) [49]	NEDLAC Liquor Task Team member
Business Unity South Africa (BUSA) (includes South African Breweries as members [50])	Apex body 'formally recognised representative of business at NEDLAC' [51]. NEDLAC Liquor Task Team member. Commissioned a 2022 socio-economic assessment of the Bill [47]
Consumer Goods Council of South Africa (CGCSA) (membership includes retailers and other industries including tobacco [52])	NEDLAC Liquor Task Team member. Named party to a July 2020 version of a draft social compact

*The social compact refers to efforts by the South African government 'to forge a comprehensive social compact that would join all social partners in a common programme to rebuild the South African economy [post-Covid-19 pandemic] and enable higher growth' [53]

Thus, an extra impact assessment was commissioned by NEDLAC and funded by the alcohol industry [39]. Industry suggested the choice of consultancy firm:

Genesis Analytics was appointed on the 31st [of] August 2017 after Business informed the 1-aside team that Genesis analytic will be able to conduct the research study within the time constraint.

(NEDLAC report on the Liquor Amendment Bill, November 2017 (39 p.2).

Completion of this extra assessment caused at least a one-month delay to the NEDLAC report on the Bill and was not available for the task team to consider during their deliberations (39 p.2). The report concluded that "the WHO guidelines should be adapted to South Africa", including applying zoning restrictions to alcohol-licensed premises, restrictions on marketing, and a

Table 2 Membership and activity of NEDLAC committees

Committee and years of key activity	Reported membership				Nature of key activity
	Industry (most often referred to as 'business' in the dataset)	Government	Labour	Community	
NEDLAC Trade and Industry Chamber Liquor Amendment Bill Task Team; 2017 (39)	7	3	5	None noted	The Department of Trade and Industry tabled the National Liquor Amendment Bill to the task team for engagement in April 2017. The task team submitted the NEDLAC report on the Bill, which was based on detailed review by all parties to identify areas of agreement and disagreement between April and November 2017 (39)
NEDLAC Trade and Industry Chamber 1-aside Task Team; 2017 (39)	Sub-committee of the above (individual members unknown)				Set up to support the commissioning of industry-funded research on the economic impact of the Bill (39 pp.1–2),
NEDLAC Rapid Response Task Team (NRRTT) Liquor Industry Sub-Committee; 2020; 2021 (54)	15 reported in (54) (pp.56–7), although 24 reported to attend at least one meeting in July 2020	8	7	1	In 2020, a NRRTT was set up as part of the wider government response to the Covid-19 pandemic. A sub-committee was created to address the impact of the temporary alcohol sales bans on the industry (54)
Liquor Advisory Council; 2020	Yes (number unknown)	Unclear	Unclear	Unclear	In November 2020, industry confirmed it had set up the council, apparently to discuss their proposals for the social compact
NEDLAC Rapid Response Liquor Industry 2-aside Task Team; 2021	3	7 (including 5 NEDLAC officials)	2	1	In June 2021, another NRRTT sub-committee was set up, which included discussion of the social compact

Table 3 Industry-linked reports on the Draft Liquor Amendment Bill 2016

Title of report	Month/year	Funder information	Authors	Key conclusions
'Evaluating the economic, health and social impacts of the proposed Liquor Amendment Bill, 2017' (56)	Oct 2017	'The study is commissioned by NEDLAC and is funded by the South African Liquor Brands Association (SALBA)' (56 p.10)	Genesis Analytics (consultancy firm)	Report estimates following impacts of the Bill: 185 lives a year saved due to a 3% reduction in alcohol-attributable road traffic fatalities; reduced alcohol consumption; minimal impact on employment for alcohol industry; reduced competition in industry; and 'the policy changes are likely to reduce public health costs' (56 pp.3–6)
'An independent re-evaluation of the economic, health and social impacts of the Liquor Amendment Bill, 2016' (47)	Sep 2022	'This work is commissioned by Business Unity South Africa (BUSAs) and is funded by the South African Liquor Brands Association, VINPRO and the Beer Association of South Africa' (47 p.8)	Genesis Analytics (consultancy firm)	Implementing an increase in the legal drinking age from 18 to 21 and above-the-line advertising restrictions was estimated to lead to a drop of between 3.51–4.44% in aggregate consumption and save 376 lives through a reduction in alcohol-attributable road traffic fatalities (47 p.4). Time and zoning restrictions on the manufacture and distribution of alcohol and extended legal liability for harm arising from selling to unlicensed retailers 'will have no discernible impact on aggregate consumption or on social harms, while potentially creating economic cost for industry' (47 p.4)

staggered introduction of an increased legal drinking age (56 p.135).

The 184 page 're-evaluation' of the policies proposed in the Bill in 2022 by the same consultancy firm included many of the same authors of the 2017 report. The authors came to a similar conclusion regarding aggregate consumption, yet were more critical of the Bill overall [47]. Implementing an increase in the legal drinking age from 18 to 21 and above-the-line advertising restrictions was estimated to lead to a drop of between 3.51 and 4.44% in aggregate consumption (47 p.3) and save 376 lives (double that of the 2017 estimate). Yet, the report describes

these interventions (applied together) as "one of relatively low social and health benefits, but equally, relatively low economic cost" (47 p.3). Notably, the number of lives saved was based on a reduction in road traffic incidents only rather than the much broader range of alcohol harms, with the authors stating:

While some of the likely reduction in consumption as a result of the proposed amendments could relate to hazardous consumption (such as youth consumption), the study does not quantify the extent of the change in hazardous consumption in particular, as

it is difficult to assess which groups of drinkers will be impacted by the interventions.

(Genesis Analytics evaluation of the Liquor Amendment Bill, 29th September 2022 (47 p.4))

Regarding mandatory compliance with the Broad-based Black Economic Empowerment (B-BBEE) Act 53 of 2003¹, the report made similar arguments to those made by the alcohol industry in the 2017 NEDLAC report on the Bill (see below), for example emphasising the impact on small, “family-owned” businesses and questioning the legality of the proposal (47 p.5). A page was dedicated to alcohol brands “increasingly using their far audience reach to share information about responsible drinking and pertinent community challenges” since 2020 (47 p.34). When assessing the economic costs of alcohol, the report included a heavily criticised, industry-funded analysis that the alcohol industry has a net positive impact on society. Although the report noted the industry funding, we could find no reference to the extensive criticisms the analysis had received [58]. Finally, when noting consultations with relevant groups, the report categorised Aware (an alcohol industry-funded [44] ‘social aspects and public relations organisation’) as a civil society actor, despite there being a separate section for industry (47 p.166).

The authors of the 2022 report acknowledged the different conclusions compared to their 2017 analysis, and described this as due to “a more thorough methodology”, including “discounting international evidence based on conduciveness parameters for regulation and enforcement in South Africa”, using more conservative estimates from consulted stakeholders, using updated estimates for general and youth population consumption, and more recent data on road traffic fatalities (47 p.161).

Industry framing within the NEDLAC report on the Liquor Amendment Bill

NEDLAC, including government, labour and industry representatives, completed a review of the Bill between April - November 2017. The result was a report on the Bill [39], with NEDLAC membership facilitating detailed industry comment, including on implementation. No community involvement in the NEDLAC review was noted in the report, although community comment had been sought prior when the Bill was gazetted and “consideration of comment arising from public consultation was finalised in March 2017” (39 p.1). Industry framed an increased drinking age, and restrictions on advertising and alcohol outlet locations as unacceptable, ‘bad’

¹ The B-BBEE ACT establishes a legislative framework for the promotion of black economic empowerment with the expressed intention to address the legacy of apartheid and promote participation of black people in the economy.

solutions to alcohol harms, despite such approaches being described by the WHO as the most cost-effective policy interventions for addressing alcohol harms [59]. Various industry arguments were made throughout the document that portrayed the alcohol industry as key economic actors who are socially responsible and concerned with social justice. This was combined with framing elements of the Bill as undesirable, raising concerns that (a) parts of the Bill would disproportionately impact small businesses and young entrepreneurs; and (b) parts of the Bill may not align with the Broad-based Black Economic Empowerment (B-BBEE) Act 53 of 2003. At times, industry arguments appeared contradictory. For example, when opposing social media marketing restrictions, industry stated “the ‘age gate controls’ that exist can and should be strengthened to ensure that under 18s do not access liquor adverts’, yet in the next sentence stated “controlling the internet is impossible” (39 p.27).

Industry suggested alternative proposals focused on self-regulation and voluntary action by corporations, and appeared to suggest the building of schools should work around existing alcohol outlets, instead of closing alcohol outlets near schools. There appeared to be more agreement between the parties regarding the functions of a new National Liquor Regulator; proposals to regulate specific trading days and hours for alcohol to be distributed and manufactured, and measures to address production of counterfeit products. A summary of the key framing strategies used by industry in the report is provided in Table 4.

Industry carrot and stick during the pandemic: donations, legal action and a failed social compact

During the pandemic, three temporary alcohol sales bans were implemented (March 27 to June 1, 2020; July 13 to August 17, 2020 and December 28, 2020 to February 2, 2021) with a view to freeing up health services to deal with Covid-19, which was successful [60]. The alcohol sales bans were discussed within NEDLAC, and in July 2020 the idea of a social compact was raised. Groups involved (industry, government, labour, and community representatives) were all referred to as social partners, and there were reports of discussions about the social compact between the Minister of Health and the NEDLAC executive council:

There was a [sic] further preparations to convene a meeting with the President in the afternoon and it was agreed that this matter [alcohol ban] should be on the agenda if there are solid proposals in place... Way forward: social partners to develop a social compact document that would be presented at the meeting [with the president] of 03 August 2020.

Table 4 Key framing strategies used by industry within the NEDLAC report on the Draft Liquor Amendment Bill (2017)

Proposal in the Draft Liquor Amendment Bill (including amendments proposed post-sharing the Bill for public comment)	Industry frame-supporting claims	Illustrative examples (all quotes from [39])
<p>The unacceptable, 'bad' solution</p> <p>Increase legal drinking age from 18 to 21 years</p>	<p>Proposal contravenes existing norms, rules and laws</p>	<p>"The provision [is] incongruent with progressive constitution and the age of majority act. A 19-year-old may marry without the consent of his or her parents but would need his parents' consent to celebrate the occasion with a glass of sparkling wine" (p.29)</p> <p>"Under the current definition of a minor, the law treats under 18s as minor's who are usually processed in a juvenile court. Persons over the age of 18 are treated as adults and are prosecuted as such. Consumers who are between 18 and 21 who lie about their age will be prosecuted as adults and we are therefore creating a new category of criminals" (pp.29–30)</p> <p>"A socio-economic impact assessment must be conducted on the implications for university campuses, especially considering that students are of a legal drinking age under the current definition" (p.25)</p>
<p>"Educational institution' means a place where people of different age attend to gain knowledge and education which includes, private and public institutions, childcare, preschools, elementary schools, high schools and institutions of higher learning" (p.25) (changed from 'school' used in earlier draft of the Bill)</p>	<p>Proposal contravenes existing norms, rules and laws</p>	<p>"Many universities prefer students to use the bars and pubs on campus because it means that students do not have to drive or walk back to campus. A socio-economic impact assessment must be conducted on the implications for university campuses, especially considering that students are of a legal drinking age under the current definition" (p.25).</p>
<p>Restrictions on advertising on billboards (including near educational institutions), pamphlets, internet, television and radio (beyond specific time slots) and cinemas and theatres</p>	<p>Proposals are unnecessary and unacceptable</p>	<p>"[Restrictions on billboards] will impact negatively on the entrepreneurs who are increasingly using billboards as a platform to enter the media industry" (p.27)</p>
<p>Restrictions on liquor outlet locations, including within a specific radius of schools (later educational institutions), residential areas, and places of worship and recreation</p>	<p>Proposals will lead to losses for business, economy and society</p>	<p>"The 'age gate controls' that exist can and should be strengthened to ensure that under 18s do not access liquor adverts" (p.27)</p>
<p>Restrictions on liquor outlet locations, including within a specific radius of schools (later educational institutions), residential areas, and places of worship and recreation</p>	<p>Proposals contravene norms, rules and laws</p>	<p>"This provision seeks to usurp the constitutional powers of the provincial authorities...this clause seeks to elevate the norms and standards to legislation" (p.32)</p>
<p>Restrictions on advertising on billboards (including near educational institutions), pamphlets, internet, television and radio (beyond specific time slots) and cinemas and theatres</p>	<p>Policy will fail and have perverse consequences</p>	<p>These outlets simply will pop up illegally elsewhere and will lead to the illegal trade in alcohol outside the regulators control" (pp.27–8)</p>
<p>Restrictions on advertising on billboards (including near educational institutions), pamphlets, internet, television and radio (beyond specific time slots) and cinemas and theatres</p>	<p>Proposals will lead to losses for businesses, economy and society</p>	<p>"This provision would essentially prohibit the creation of viable competitors to the incumbent players and severely limit the transformational agenda of government" (p.31)</p>
<p>Restrictions on liquor outlet locations, including within a specific radius of schools (later educational institutions), residential areas, and places of worship and recreation</p>	<p>Proposals contravene norms, rules and laws</p>	<p>"If the manufacturer and distributor can demonstrate compliance with the regulations, then unless the state is able to prove the contrary there should be no liability" (p.34)</p>
<p>Applicants to the National Liquor Regulator (to be registered as an alcohol manufacturer or distributor, or both) must meet the Broad-Based Black Economic Empowerment level of compliance</p>	<p>Proposal will lead to losses for businesses, economy and society</p>	<p>"Becoming compliant and remaining compliant [with the B-BBEE Act] is not as simple as suggested in the provisions of the bill. Businesses could fall 2 or 3 levels because black shareholders choose to sell shares in a business to a white investor. It would severely restrict the black entrepreneur's right to sell his or her shares and make a profit from the sale if the seller has restrictions placed on him or her because the business wishes to retain its BBEEE score" (pp.30–1)</p>

Table 4 (continued)

Proposal in the Draft Liquor Amendment Bill (including amendments proposed post-sharing the Bill for public comment)	Industry frame-supporting claims	Illustrative examples (all quotes from [39])
The acceptable, 'good' solution		
<i>In response to proposals to restrict advertising and increase legal drinking age from 18 to 21:</i>		
Self-regulatory marketing guidelines	Solutions should be self-regulatory and not disrupt business	"The Bill should apply the guidelines in the ARA [now Aware] code of commercial communication which govern alcohol advertising content and times. These codes represent global best practice" (p.26)
Education programmes		"Industry would make resources available to run educational programmes and conduct research" (p.29)
<i>In response to restrictions on liquor outlets located within a specific radius of schools (later educational institutions), residential areas, and places of worship and recreation:</i>		
Education programmes	Solutions should target individuals, not whole populations	"Consumers [should] be held accountable for their purchasing behaviour. By law licensees are required to display their licenses on the premises. Government should educate consumers to report unlicensed businesses and how to identify them" (p.35)
<i>In response to restrictions on liquor outlets located within a specific radius of schools (later educational institutions), residential areas, and places of worship and recreation:</i>		
No building of schools near licensed premises	Solutions should be self-regulatory and not disrupt business	"Business proposed that the current license holders should not lose their license to trade and that spatial planners for cities should plan ahead so that schools etc. are not built close to existing licenses in future" (p.32)
Education programmes	Solutions should target individuals, not whole populations	"Encouraging responsible consumption of alcohol and educating consumers will have a greater impact than closing outlets (p.32)

(NRRTT on the liquor industry meeting minutes, 27th July 2020)

Occasionally, the various litigation threats and court challenges by industry were referenced during these discussions. For example, in a NRTT on the liquor industry meeting on 27th July 2020, industry indicated that there would not be further legal action against the temporary sales bans. This was followed up by letter three days later to confirm:

*We see no reason to engage in litigation while we are having constructive, meaningful and timely discussions with government on the steps necessary to deal with the Covid-19 pandemic.
(Letter to NEDLAC convenor from Vinpro, SALBA, BASA, NLTC and LTASA, 30th July 2020)*

Other legal action by industry continued into 2022 [55, 61].

The aim of the social compact was reported as follows:

The social compact sought to ensure that the liquor industry committed to provide various kinds of support to the health sector as well as introduce harm reduction programmes in exchange for a [sic] lifting of restrictions.

(NEDLAC annual report 2020/21, p. 37)

A draft version of the compact was produced in late July 2020 and included "immediate measures to enable the re-opening of liquor sales on a restricted basis" (Draft Liquor Social Compact, version 2, 29th July 2020), subject to specific conditions. Industry commitments of non-specified amounts to fund partnerships with government, community-based organisations and NGOs, and to establish a "Covid-19 hospital support facility" were also noted in the same document.

The Bill was referenced at times as part of discussions regarding the social compact. For example, during a RRTT on the liquor industry meeting on 24th August 2020 (after the second temporary alcohol sales ban had been lifted) it was agreed that the Bill would be referenced within the social compact under medium term

planning. Yet in September 2020, industry representatives noted that:

Anything related to policy changes must be addressed by rule of law to the relevant piece of legislation not through a Social Compact process. (RRTT on the liquor industry meeting minutes, 7th September 2020)

At the same meeting, the Chair (a NEDLAC official) “undertook to come up with self-regulation measures together with business that go beyond written guidelines and recommended drinking limit”. Industry suggested such measures could be implemented through Aware. When labour asked for detail about the organisation, industry confirmed:

The money that is contributed [to Aware] comes from the liquor industry and is run independently through a CEO and the Board. The alcohol industry appoints the CEO and the Board. (RRTT on the liquor industry meeting minutes, 7th September 2020)

In this and other discussions about the social compact, industry repeatedly shared various donations and investments made during the pandemic. In June 2021, a NEDLAC official shared a letter from industry directed to the President announcing a South African Breweries R2 billion investment to support economic recovery. Occasionally, however, it was reported that investments would not be followed through. For example, in late August 2020, government noted that:

There’s been a threat from SAB [South African Breweries] to withdraw the 2.5 million that they were going to invest in the sector on the basis of the fact that they were not able to trade. Therefore, seeing that the ban has been lifted, there is a need for a commitment from the sector that they will relook at this investment call. (NRRTT on the liquor industry meeting minutes, 24th August 2020)

Meeting minutes report that industry declined to rescind the withdrawal of the funds and confirmed instead that the 2021 investment was under strict review. The result of the 2021 investment review and whether the withdrawal of funds was later rescinded is unclear.

At least seven versions of the social compact were produced and launches planned for November and December 2020, with industry suggesting inviting the President in an RRTT meeting in December. In the same meeting,

however, the focus appeared to move towards shorter term measures:

Ways forward...the focus should shift from signing the compact but what can be done to prevent the resurgence. (NRTT on the liquor industry meeting minutes, 2nd December 2020)

In 2021, South African Breweries began a legal challenge against the alcohol sales bans, which was dismissed in May 2022 [61]. This legal action was reported by NEDLAC as a key reason why the social compact had not been agreed:

By the end of the period under review, the contents of the social compact had not been agreed as one of the key participants, the South African Breweries (SAB), had requested to be excused from engagements on the matter due to its pending court case on the liquor ban issue.

(NEDLAC annual report 2020/21, p. 37)

In 2023, NEDLAC confirmed that the attempt to agree a social compact had been unsuccessful [62 p21].

Discussion

We identified activity by 14 key alcohol industry organisations related to the Bill between 2016 and 2022. Alongside industry membership of the NEDLAC Executive Council and Trade and Industry Chamber, industry representation on five key committees facilitated their involvement in Bill-related discussions. The industry activity we report is entirely legal, with organised industry involvement written into the NEDLAC constitution [63]. This form of what is in our view very early ‘regulatory capture’ [5] gave industry a voice not only within NEDLAC, but also facilitated access to other government departments. Although ‘community’ are named as a key actor within NEDLAC, they appeared to have much less representation than other groups in the committees we identified and we found no evidence to suggest they were involved in the 2017 NEDLAC report on the Bill.

A previous study outlined how the Covid-19 pandemic provided opportunities for innovation and the prioritisation of public health in alcohol policymaking in the country [55]. Yet, it also led to industry legal threats and use of the media to oppose temporary alcohol restrictions, described more widely as signalling virtue, but promoting harm [64]. Our study adds how the crisis was also used to influence longer-term legislation, such as the Bill. Our analysis finds that the crisis interrupted the Bill’s progression, and during this interruption, industry used a combination of legal threats and donations (and at least

one threat of withdrawing donations) to put pressure on the government to move away from evidence-informed legislation to self-regulation. Industry's involvement in NEDLAC therefore enabled them to express both coercive and appeasing power [65] to attempt to shape what the social compact would involve. The promotion of what are known to be less effective, individual-based solutions are predictable and also reflect the activity of transnational corporations globally [5].

Similarly, the strategies used to frame the Bill as an unacceptable, 'bad' solution and less effective, individual-based responses as acceptable, 'good' solutions are part of the playbook used by health-harming industries globally to prevent policies that will reduce consumption and thus profits [5]. Applied to South Africa, there was an emphasis on the negative impact on small businesses and black entrepreneurs, despite the 2022 industry-funded impact assessment estimating that the biggest five companies (South African Breweries/AB InBev, Distell, Heineken, Molson Coors and Diageo) hold between 85% (by value) and 90% (by volume) of the South African market (47 p.19). That one of the 'good' solutions proposed was for spatial planners to avoid building schools near alcohol-licensed premises is an example of just how far apart public health and industry interests can be.

Our findings echo the industry activity reported by Bertscher et al. [10] related to the 2013 Draft Control of Marketing of Alcoholic Beverages Bill that has also not progressed through the legislature. Whereas Bertscher et al. studied the whole policy formulation process, our focus was a more detailed look at the specific mechanisms used to influence policy to align with commercial interests within a specific government body. As Bertscher et al. conclude, many of the strategies used by industry reflect global activity by health-harming industries. For example, the use of a parallel, 'grey' pseudo-scientific literature that does not adhere to scientific norms is well-documented by alcohol and other industries globally [5, 8]. Here, industry funded two further assessments of the Bill, despite an independent socio-economic impact assessment having already been completed [53]. The first industry-funded report concluded that the Bill would have public health benefits with generally minimal economic costs. Their second document was more critical, despite concluding that two of the proposals within the Bill would save double the number of lives estimated in 2017. Further, this estimate was only based on lives saved from a reduction in road traffic incidents, rather than calculating the impact of a reduction in aggregate consumption on high rates of alcohol-related harms generally in the country, for example on rates of interpersonal violence, sexually transmitted diseases [15], and fetal alcohol spectrum disorders [66]. Industry 'responsible drinking' advertisements were presented uncritically in the report,

despite evidence that this is a strategically ambiguous term that can reinforce existing drinking harmful attitudes and behaviours [67, 68].

Concerns regarding how government-led impact assessments are used in South Africa [10, 69] and more globally [70] centre around corporate influence undermining the development of public health policies. It was industry's role within NEDLAC that facilitated the creation of the 2017 impact assessment, because industry had the opportunity to (a) argue that the independent socio-economic assessment that had already been done was incomplete because it had not covered potential job losses, (b) fund the study, and c) suggest the consultancy firm chosen to carry out the study. A further assessment was completed in 2022, which again was funded by industry. This evidence suggests corporate influence over impact assessment continues in South Africa via the mechanism of industry involvement in NEDLAC.

There are several limitations to our study. We focused on industry activity; we do not, therefore provide insight into the perspectives and inputs of other groups, including government, labour, and community. Previous study has found that, whilst industry is a central actor in alcohol policy formulation in South Africa, other actors play key roles, including using evidence strategically [10]. This is therefore an account of industry involvement in the Bill, rather than the policy formulation process overall, and contributions from other parties may also have delayed or otherwise influenced the Bill's progress. For example, we found industry membership of five committees where the Bill was discussed between 2017 and 21, but other committees without industry involvement may also have been established during that time. We received only five documents related to 2017, and no documents covering 2018, 2019, and Jan-Jun 2020. We do not know the reason for these gaps, and they may mean our analysis has missed significant events that contributed to delays to the Bill. Our searches of the 2016/17, 2017/18, 2018/19, 2019/2020, 21/22 and 22/23 NEDLAC annual reports for 'alcohol' and 'liquor' also did not find any results. Yet, as outlined above, Bill-related discussions did take place within NEDLAC during that period. Increased transparency about the extent and nature of alcohol policy-related activity would help the wider community understand why the Bill has not yet progressed through the legislative process. We did not have the resources to conduct a comprehensive analysis of the two industry-funded socio-economic assessments of the Bill, and instead focused on key conclusions and industry activity related to the reports. This means we may have missed more subtle industry interventions in science related to the Bill. Although we have attempted to verify and extend the data using external sources, this was not exhaustive and there may be other publicly available documents

that may shine further light on delays to the Bill. Consequently, as noted by other researchers utilising Freedom of Information legislation [31], this should be viewed as a partial account of industry activity over a limited time period, rather than a full account of why the Bill has not progressed through the legislative process. Interviews with actors involved in the Bill may also provide additional insights, as in previous study [10], although we note that the issues are sensitive and therefore any such studies should look at all actor involvement in the Bill, not just industry.

Freedom of information legislation is underutilised as a research tool [33] and there exists little guidance on how to apply the method to health policy research. Recent studies using the method have been based on UK or US legislation [34, 71–73] with reports that access has become increasingly challenging [33, 74]. Our experience mirrors this to an extent, but the quick response and access to a relatively large dataset is encouraging and indicates that the method should not be restricted to use in high-income countries. This method supported the study of less visible, appeasing power [65] and relationships between industry and other groups, as well as adding how monetary promises as well as legal threats are used by industry ‘behind the scenes’, as well as more publicly [55]. There is a need for health policy researchers and advocacy organisations to share expertise so these methods can be used in LMICs where relevant freedom of information legislation exists, mindful of the challenges unique to each country in terms of access and implementation [75].

Within the field of commercial determinants of health it is acknowledged that commercial activity can have both positive and negative health impacts [6, 76]. In South Africa, the alcohol industry has an economic role, and also either claimed to support various health and social services during the pandemic, or suggested providing such services, as part of corporate social responsibility efforts. Yet, corporate social responsibility initiatives more widely have been found to be largely ineffective at addressing alcohol and other harms [5, 77], and the cost of alcohol harms in South Africa is high [20]. The evidence is clear on what intervention is needed to address alcohol harms in the country [78]; the lack of progress has therefore been described as a result of a lack of political will to implement changes that might reduce profits [79]. Our findings add nuance to this perspective, because involvement in NEDLAC as a social partner gave industry the opportunity to attempt to influence the Bill. Which groups are included in government processes and what role they play could therefore be an important factor that could influence the will (and action) for change. Our findings also mirror previous studies on corporate influence in nutrition and alcohol policy in the country

[10, 11]. Just as alcohol is no ordinary commodity [80], the industry is no ordinary stakeholder in matters related to public health. Industry’s role in impact assessments and public health policy formulation should be reconsidered globally, and it should be viewed as a (largely transnational) commercial actor, rather than the social partner it is described as within NEDLAC locally.

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Reflexivity statement

The idea for the wider project was developed by the University of Stirling and commissioned by FORUT. Following discussions with potential collaborators, University of Stirling and FORUT agreed two case studies, of which this study is one. AMD conceptualised the case study, and GM, AMD, and PS were funded as part of the study. All authors had access to the data and collaborated to share skills and learnings throughout. FORUT provided extra funds to share the research in ways that best suit local needs, the design and conduct of which will be led by partners based in those communities/settings.

Author contributions

GM co-acquired the funding for the wider project, co-designed the methodology, led the data analysis and wrote, revised and finalised the text. PS collected and analysed the data and supported writing the text. SG co-designed the methodology, supported data analysis, and revised the text. AMD conceptualised the study, co-designed the methodology, and supervised and conducted data collection and analysis. All authors read and approved the final manuscript.

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Data availability

Where already published online, data have been cited accordingly. Resources were not available to anonymise all names and other personal information about individuals in the data, which is a requirement under South African law to publish data received via a Request for Access to Record.

Declarations

Ethics approval and consent to participate

In line with previous studies using similar freedom of information requests, as data were in the public domain the study did not require ethical approval. No human participants were involved in this study.

Consent for publication

Not applicable.

Competing interests

The authors declare no competing interests.

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PART 3

Alcohol sports sponsorship in Uganda: A case study analysis

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Alcohol sports sponsorship in Uganda: A case study analysis

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Abstract

Aims: This study aimed to explore the nature and extent of the activities involved in alcohol sports sponsorship in Uganda.

Methods: An exploratory case study methodology was utilised to document examples of alcohol industry activity related to sports sponsorship in Uganda. This study employed desk-based reviews of publicly available examples of sponsorship activities from online news outlets ($n = 9$) and social media sites ($n = 19$) as well as site visits to sporting venues ($n = 4$) to observe examples of alcohol sponsorship practices.

Results: Across the sample of data included in this study, we observed multiple sponsorship deals within a range of professional sports, including football, basketball, and golf. Across these sponsorship arrangements, several activities explicitly promoted alcohol products or subtly blended their branding within other stimulating content. This included: a presence on social media channels; limited edition products; alcohol brand logos on match strips; advertising and promotion at various locations inside and outside the sporting venues; and alcohol industry representatives featuring in news reports.

Conclusion: Alcohol sports sponsorship in Uganda is widespread and multi-faceted. The types of sponsorship activities observed in this study mirror those used around the world. The transnational companies involved use sports sponsorship to position themselves as central to Ugandan economy, culture, heritage and the sustainability of sports across the country. Understanding how sports sponsorship is used to promote alcohol brands across Uganda is important to inform future policy decisions regarding alcohol marketing.

Introduction

Alcohol is the eighth leading preventable risk factor for disease and the largest risk factor for disease burden globally among people aged 25 to 49 (GBD 2019 Risk Factors Collaborators, 2020), causing a range of harms both to individuals (e.g. cardiovascular disease and cancers) and to others (e.g. violence). Alcohol consumption worldwide is on the increase, attributed in part to its promotion and marketing by alcohol industries (Manthey et al., 2019). One region increasingly targeted by the alcohol industry in their promotional campaigns is the continent of Africa (Babor et al., 2015; Ferreira-Borges et al., 2017; Jernigan & Babor, 2015; Lesch et al., 2024). Alcohol companies have the potential to increase alcohol harms in Africa because of their huge amounts of resources, marketing sophistication, and political influence (Carrasco et al., 2016; Hanefeld et al., 2016; Jernigan & Babor, 2015). Researchers have drawn attention to the high levels of alcohol harm across the continent, arguing that current approaches to alcohol harm prevention are ineffective (Morojele et al., 2021; Room et

al., 2022). Despite the increased interest in alcohol prevention and control, most African countries have yet to develop regulations on alcohol marketing and promotion (Morojele et al., 2021).

The World Health Organization (WHO) Global Status Report on Alcohol and Health shows Uganda has the highest per capita alcohol consumption in the African Region (WHO, 2024). In Uganda, The Liquor Act (1960) regulates the manufacture and sale of liquor to licensed premises and prohibits the consumption of alcohol by children. It also prohibits all forms of alcohol advertising, promotion, and sponsorship which are false, misleading, or deceptive or likely to create an erroneous impression about the characteristics, health effects, or hazards of alcohol (Parliament of Uganda, 1960). The Uganda National Alcohol Control Policy was published in 2019 with the aim of protecting society (particularly young and other vulnerable people) against the impacts of the harmful use of alcohol (Republic of Uganda Ministry of Health, 2019). To do this it identifies 11 priority areas, one of which is alcohol

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Keywords: alcohol, Uganda, sponsorship, marketing, policy

marketing. Despite the registered problems associated with harmful alcohol use in the country, Uganda has no further statutory controls on alcohol marketing. The Advertising Standards of the Uganda Communication Commission (UCC) feature voluntary guidance to prevent and control harmful and misleading advertising of alcohol to the public and specifically children (UCC, 2023). Previous research suggests that voluntary self-regulation is ineffective at preventing irresponsible alcohol marketing (Babor et al., 2022). One study which examined the content of alcohol billboards in Kampala revealed widespread violations of agreed-upon industry advertising standards by alcohol companies (Swahn et al., 2024). The Uganda Alcohol Control Bill, 2023, aimed to regulate the manufacture, importation, sale, consumption and advertisement of alcoholic drinks. However, in August 2024, the Parliament of Uganda rejected the motion for the second reading of the Alcohol Control Bill after reported lobbying from the alcohol industry and opposition from the Committee of Trade and Health (Parliament of the Republic of Uganda, 2024).

There are currently no statutory restrictions on alcohol sports sponsorship in Uganda. Sports sponsorship provides a highly effective, high-profile platform for alcohol companies to promote their products and capitalise on existing emotional connections that consumers have with their favourite teams, players, or events (Hastings et al., 2010; Purves, 2017; Purves & Critchlow, 2020). International evidence demonstrates how sports teams and organisations are used by alcohol companies to promote their brands (Belt et al., 2014; Macniven et al., 2015; Purves et al., 2017); that sports sponsorship influences consumers, including young people (Critchlow et al., 2019; Houghton et al., 2014); and that there is an association between exposure to alcohol sports sponsorship and increased consumption, including among young people and adult sportspersons (Brown, 2016). In Uganda, alcohol producers have partnered with various sporting bodies to sponsor sports teams, tournaments and other activities. Examples include sponsorships of the Ugandan National Football Team (The Uganda Cranes) and the governing body, the Federation of the Uganda Football Association (FUFA; FUFA, 2024), rugby tournaments (Nile Breweries Limited [NBL], 2022) and the Federation of Uganda Basketball Association (FUBA; FUBA, 2024). Despite some high-profile examples of alcohol sponsorship, there is a distinct lack of research exploring the nature and extent of alcohol sponsorship in Uganda, what sports are included, and what activities are involved.

Methods

Study Aim and Research Questions

The aim of this research was to examine the nature and extent of the activities involved in alcohol sports sponsorship in Uganda. We sought to explore what types of sponsorship activities related to professional sports are taking place across Uganda and which alcohol industry actors are involved. This case study is part of a wider project studying alcohol industry corporate political activity across sub-Saharan Africa (Mitchell et al., in press).

Study Design

This study utilised an exploratory case study methodology to document examples of alcohol industry activity related to sports sponsorship in Uganda. The case study approach is particularly useful when there is a need to obtain in-depth appreciation of an issue, event or phenomenon of interest in its real-life context (Priya, 2021). It has been employed in previous research into commercial determinants of health and is particularly helpful where the phenomenon of study is not suitable for an experimental study and relevant data sources are diverse (Purves & Critchlow, 2020). The study design comprised of desk-based reviews and extraction of publicly available examples of sponsorship activities. In addition, sporting venues including two rugby grounds, a golf club and a sports complex that houses tennis, hockey, boxing and cricket facilities, were visited to observe alcohol sponsorship practices (Lawrenz et al., 2003; Lucan et al., 2017; Robertson et al., 2022; Scott et al., 2008). The advice of the General University Ethics Panel (GUEP) of the University of Stirling was sought, and because the study was based on publicly available data, the Panel deemed ethics approval was not required for this study.

Data Collection

Three data sources were used: social media sites, online news outlets, and sporting venues. These sources focused on publicly available data and were included based on previous research on alcohol sports sponsorship by Purves and Critchlow (2020), and research on alcohol marketing by Purves and colleagues (2014). Analysis of publicly available data, including social media data, has the potential to enrich understanding of industry actors and their activities.

To identify which brands and producers were involved in alcohol sponsorship across various sports in Uganda, initial scoping was conducted on social media. This involved manually searching the social media accounts (Facebook, X [formerly Twitter], and TikTok) of the major Ugandan sporting organisations, including FUFA, the Rugby Union and the Uganda Boxing Federation for examples of posts that featured alcohol sponsorship. Our scoping review showed that sports sponsorship in Uganda is dominated by two alcohol companies, Nile Breweries Limited (NBL) and Uganda Breweries Limited (UBL). Based on the findings from the scoping stage, we performed a detailed review of their sponsorship activities for the study period of January 2020 to March 2024. Official social media accounts and websites of these producers were manually examined for examples of sports sponsorship which occurred. During data collection, the X account of Uganda Breweries was publicly available. The account is now a protected account meaning only confirmed followers can gain access. Users are required to tap the 'follow' button to send a follow request. In total, 19 social media posts were captured (See [Appendix 1](#)).

We also searched online newspaper publications for articles which mentioned alcohol sports sponsorship, either by using the website's search function, or if this was not possible, manually searching back through the archived news pages for examples which occurred within the study period of January 2020 to March 2024. The search terms included

'alcohol and sports in Uganda', 'alcohol sports sponsorship', 'Uganda Breweries and sports', 'Nile Breweries and sports', 'alcohol consumption in Uganda', 'alcohol marketing in Uganda', and 'alcohol and sports advertising'. Four news publications were searched including *The New Vision*, *Monitor*, *Kawowo Sports*, and *Uganda Sports Bulletin*. *The New Vision* and *Monitor* were included because they are the two leading news publications in Uganda. *Kawowo* and *Uganda Sports Bulletin* are sports-specific news entities. In total, nine news articles were included in this study (See [Appendix 1](#)).

Physical site visits were conducted at selected sporting venues, bars and restaurants in and around Kampala City during February and March 2024. Sites were selected to cover the most popular sports in Uganda. Four site visits were conducted: a golf club, two rugby grounds and a sports complex. The sports complex houses cricket, tennis, boxing, and hockey sports facilities with a sports bar as its main entertainment and refreshment facility, patronized by sportsmen and women, their families and friends. Examples of sponsorship activity gathered at these venues included signage, posters, billboards, branded merchandise and branded fridges (See Appendices 2 and 3). Two football stadiums, which are the main football grounds in Kampala City, were closed for major renovation works and were therefore not included. All included sporting venues were publicly accessible except for the golf club. Staff granted permission to enter the golf club grounds to gather data. Permission to take pictures was obtained at all grounds. It is a limitation of this study that the site visits were confined to Kampala City, due to the feasibility of visiting various sites during the study period. The data collected in Kampala City may not represent sponsorship activity across all of Uganda and thus provides limited insight on sponsorship practices in other areas of the country. However, by focusing on the capital city, the researchers were able to visit a range of sports venues, providing valuable insight into national trends whilst considering feasibility and logistical practicality.

The data were captured by taking screenshots of the various social media posts and articles on the websites of the online newspaper outlets and photographs taken during site visits using the researcher's mobile phone camera. All screenshots and images were saved as individual Word documents and uploaded to a secure Microsoft Teams folder hosted by the

University of Stirling which was only accessible by the research team. Prior to analysis, each example was given a designated code name and number (e.g. NB6) to allow the research team to identify specific examples.

Analysis

As in previous studies on sports sponsorship using publicly available data (Purves et al., 2014; Purves & Critchlow, 2020), findings were analysed using thematic content analysis (Krippendorff, 2004). Following data collection, examples of sponsorship activity were grouped according to their source (social media, news outlets and site visits). Two researchers then reviewed the data independently, and each created a list of main themes and practices based on previous work by Purves and colleagues (2014). These themes and practices were then reviewed and refined, and a combined list was input into an Excel spreadsheet. To ensure inter-rater reliability, a random selection of data was coded by both researchers who then met to compare coding and resolve any discrepancies. Following this meeting, the final coding frame was developed and employed.

Results

This research consisted of a review of sponsorship activities by alcohol companies in Uganda. Our scoping work suggests the two main sports sponsors in Uganda are Nile Breweries Limited (NBL) and Uganda Breweries Limited (UBL). The data are here presented as two case studies, divided between these two alcohol producers.

Nile Breweries Limited

Nile Breweries Limited is the leading beer and beverage producer in Uganda and is currently owned by Anheuser-Busch InBev SA (AB InBev; NBL, 2024), the largest multinational beer producer globally (Jernigan & Ross, 2020). Nile Breweries is estimated to be worth 2.5 trillion Ugandan Shillings (UGX) and is reported to have 57% of the Uganda beer market (Jernigan & Ross, 2020). It is the producer of Nile Special, Nile Special Stout, Club Pilsner, Eagle Lager, Eagle Extra, Eagle Dark, and Castle Lite beverages (NBL, 2024). Nile Breweries sponsors a range of sports and events across Uganda (See Table 1).

Table 1

Nile Breweries' Sponsorship Arrangements

Organisation	Sport	Brand	Reported Value	Duration of deal
FUFA	Football	Nile Special	UGX 4bn ^a	4 years
Uganda Rugby	Rugby	Nile Special	UGX 9.8bn ^b	4 years
USPA	Sports Personality of the Year award	Nile Special	Not known	N/A
FUFA Drum	Football	Eagle POA/Nile Special	UBX 750m ^c	3 years
National Pool Open	Pool	Nile Special	UBX 340m ^d	Not known
Save River Rwizi Marathon	Running	Nile Breweries	Not known	Not known

Notes: ^a Value and duration of deal reported in NB13; ^b Value and duration of deal reported in NB11 and NB16; ^c Value and duration of deal reported in NB12; ^d Value of deal reported in NB14

Nile Breweries Limited on Social Media

Fourteen examples of NBL's social media activity were captured. The most common practice observed on social media was the inclusion of the brand names and logos of company products in sports-related posts. Brand names or logos featured in nine posts, and these tended to take the form of small, branded logos embedded in images of sports teams or events, logos on sports kits or logos in the background of images (See [Appendix 1](#): NB1, NB5, NB7, NB15, NB18, NB20, NB21, NB23, and NB31).

Nile Breweries Limited used their social media accounts to promote upcoming fixtures or results of sports matches or tournaments which they sponsored. As mentioned above, these images often contained brand logos of Nile Breweries' products or images of the products themselves. A common practice was to tag other organisations in these posts to further their online reach such as The Uganda Rugby Team (@UgandaRugby; NB20) and Mbarara Corporate Club (NB29). Within NBL's social media activity, many posts appeared to utilise elements of Ugandan culture or history in their social media posts. Posts included slogans such as 'celebrating our ancestry' (NB5) or '#1 fan of Ugandan rugby' (NB20). Ugandan cultural leaders were also tagged into posts (NB29).

Nile Breweries also used social media to promote their role in sustaining sport in Uganda. For example, in a post from Mbarara Corporate Club League (an organisation which promotes sports activities among businesses), NBL is thanked for their continued support of the League and for promoting 'sports health' and 'corporate social responsibility' which the post states, add value to the community (NB24). Additionally, NBL used social media to promote Corporate Social Responsibility activities such as the 'Save River Rwizi Marathon' (NB18). Other practices observed in a small number of posts included sponsoring special events (NB7, NB9, NB24, and NB31), promoting branded merchandise (NB15, NB20, NB21), posts featuring celebrities (NB9 and NB24), sponsor boards (NB31), and competitions (NB15).

Nile Breweries Limited in Online News Outlets

Six news articles featuring NBL's sponsorship of sports in Uganda were captured (NB11, NB12, NB13, NB14, NB16, and NB17). Alcohol sponsorship was framed as a positive source of funding for sports, and all articles captured mentioned specific brands such as Nile Special. All six articles also mentioned the value of the sponsorship deal (Table 1), supporting the positive framing that NBL was sustaining the sport financially. Representatives of the alcohol industry were quoted in five of the six articles (NB11, NB12, NB13, NB16, and NB17). Representatives of sporting organisations were also quoted in five of the six articles (NB11, NB12, NB13, NB16, and NB17). Three articles included images which featured branded logos and images of the products alongside representatives of the alcohol industry and sporting organisations (NB11, NB16, and NB17).

One article focused on NBL's sponsorship of the Uganda National Football Team and described the #CranesKabbo campaign which incentivised consumers to purchase Nile Special beer because UGX 50 from every Nile Special beer purchased would go to the 'Cranes Fund' to help the national team qualify for the next FIFA World Cup (NB17). One article reported that the representative from FUFA in charge of marketing had urged football fans to consume alcohol responsibly and to buy Nile Special beer for friends to help support the campaign (NB17). Another article reporting on Uganda Rugby's sponsorship deal with Nile Special also mentioned that the national rugby team had managed to qualify for the Commonwealth Games in Birmingham and the Rugby World Cup in South Africa with some rugby players thanking Nile Special for their support in the article (NB11). Nile Breweries' role in sustaining certain sports also featured in news articles. For example, one article reporting on the Nile Special National Pool Open tournament described how the tournament had been suspended for five years after Nile Special pulled out, claiming a company strategy change, but that the tournament had now returned after a UGX 340 million sponsorship deal with NBL (NB14).

Nile Breweries Limited at Sporting Venues

Two of the sporting venues visited, a rugby ground and a sports complex, featured sponsorship activities from NBL. During the site visit to the rugby ground, several sponsorship activities were observed including pitch-side advertising, billboards, posters, branded signage and branded merchandise. The majority of the advertisements were for Nile Special, promoting the product throughout the complex. Advertisements included slogans such as 'True Ugandan Reward from the Source' and 'Made of Uganda', indicating that Nile Special is a locally produced product which embraces Ugandan culture and heritage (See [Appendix 2](#)).

The sports complex housed four main sports grounds and facilities. These included a tennis complex, the cricket oval, a hockey stadium, and a boxing facility. Within this complex were sports bars and restaurants. Throughout the complex there were advertisements for two NBL brands, Nile Special and Castle Lite. The sports bars and restaurants within the complex featured branded refrigerators and there were billboards promoting these premises featuring Nile Special and Castle Lite (See [Appendix 2](#)).

Uganda Breweries Limited

Uganda Breweries Limited (UBL) is a subsidiary of East African Breweries Limited, in which Diageo, the largest multinational distilled spirits producer globally (Jernigan & Ross 2020), is a majority shareholder (UBL, 2024). It is the second largest alcohol producer in Uganda and is reported to be worth UGX 2.31 trillion (Chimpreports, 2019). Brands distributed by UBL include Guinness, Johnnie Walker whisky, Tusker and Tusker Lite beer, Pilsner Lager, Ngule beer, Smirnoff and Ciroc vodka, Bailey's liqueur, and Alvaro non-alcoholic drink. Uganda Breweries sponsors football (soccer), golf and basketball in Uganda (UBL, 2024; see Table 2).

Table 2***Uganda Breweries' Sponsorship Arrangements***

Organisation	Sport	Brand	Reported Value	Duration of deal
Uganda Premier League	Football	Pilsner Lager	UGX 1bn ^a	3 years
Uganda Golf Union	Golf	Johnnie Walker	Not known	Not known
Federation of Uganda Basketball Associations	Basketball	Tusker Lite	UBX 300m ^b	Not known

Notes: ^a Value and duration of deal reported in UB8; ^b Value and duration of deal reported in UB4

Uganda Breweries Limited on Social Media

Five social media posts featured UBL's sports sponsorship activity (UB1, UB6, UB7, UB9, and UB12). Like NBL, the most common practice observed was featuring brand names or logos in images. All five of the social media posts featuring UBL had the brand name of one of their products (either Johnnie Walker whisky or Pilsner Lager).

One of UBL's brands, Pilsner Lager, was among the main sponsors of the Uganda Premier League (football/soccer; UB9). Another UBL brand, Johnnie Walker whisky, was a sponsor of the Uganda Golf Union (UB1, UB6, UB7, and UB12). Supporting or sustaining the sport appeared to be a common theme throughout UBL's social media posts. One post showed the Attorney General of Uganda presenting UBL with a certificate of appreciation for supporting golf in Uganda; the post included the Chairman of UBL stating that the brewery will help to grow the game of golf and 'inspire young people to join the sport' (UB6).

These posts also demonstrated another common practice, tagging others in the posts. This was evident in four out of the five social media posts (UB1, UB6, UB7, and UB12). Uganda Breweries tagged individuals such as the Attorney General described above (UB6) but also tagged brands such as @JohnnieWalkerUG in their posts (UB7 and UB12).

Other practices observed included sponsoring special events (UB1 and UB6), reporting results or fixtures (UB7) and featuring politicians in posts (UB1).

Uganda Breweries Limited in Online News Outlets

Three news articles reported on UBL's sponsorship activities (UB3, UB4, and UB8). As with NBL, all three articles were positively framed and mentioned the value of the sponsorship deal. All three articles mentioned specific UBL brands such as Pilsner Lager (UB3 and UB8) and Tusker Lite beer (UB4). All three articles featured direct quotes from the sporting bodies involved, and two articles featured quotes from UBL (UB4 and UB8). Images featured in these articles were heavily branded with logos for Pilsner Lager (UB3 and UB8) and Tusker Lite beer (UB4). For example, one article reported on Tusker Lite's sponsorship of the Uganda National Basketball League. Images from the press conference announcing this sponsorship deal featured Tusker Lite branding throughout and included bottles of beer on the table and a giant branded cheque featuring the product and the value of the sponsorship deal (UB4).

Two articles focused on UBL brand Pilsner Lager sponsoring the Uganda Premier League. One article included the images of the beer brand sponsoring the player of the month, coach of the month and fan of the month (UB3). Another article included quotes from the Uganda Premier League Board Vice Chairman who described the sponsorship deal as 'rewarding fans and believe that this will help to make the local league even more exciting and attract even more fans to follow local football' (UB8).

Uganda Breweries Limited at Sporting Venues

Two venues, a golf club and a rugby ground, were visited which featured sponsorship activities from UBL products. The golf club was an exclusive members-only facility. During the visit, large billboards advertising Johnnie Walker whisky were observed at the entrance to the golf club. Immediately inside the gates there were more large advertisements for Johnnie Walker. Inside the club house the bar area was heavily branded with Tusker Malt signage above the bar and on various fridges throughout the club house. There was also branded signage for Johnnie Walker inside the club house (See [Appendix 3](#)).

The rugby ground included a sports bar situated within the sports ground. It is usually patronised by rugby players and fans and is open to the public for social activities and events beyond rugby games. There were large advertisements for Guinness at multiple locations, including large billboard advertisements, posters attached to the fencing, and pitch-side advertising hoardings. Guinness advertisements appeared to promote the product as something to consume whilst watching rugby, positioning it as the brand of choice for rugby fans. Inside the sports bar were further posters which featured Guinness logos, advertising rugby tournaments and fixtures. There were also posters featuring other UBL products such as Hennessy brandy, Ciroc vodka and Johnnie Walker as well as branded signage for Johnnie Walker (See [Appendix 3](#)).

Discussion

Our findings indicate that alcohol sports sponsorship is widespread in Uganda, particularly at the national level. We found evidence of multiple sponsorship deals within a range of professional sports. These included Nile Special's sponsorship of FUFA and the Ugandan National Football Team, Johnnie Walker's sponsorship of the Uganda Golf Club, Nile Special's sponsorship of the Uganda Rugby Team, Tusker Lite's sponsorship of the Uganda National Basketball League, and Pilsner Lager's sponsorship of the Uganda Premier League (football/soccer). Across these

sponsorship arrangements, several different activities were observed which explicitly promoted products or subtly blended them amongst other stimulating content (Purves & Critchlow, 2020). These included a presence on social media channels (e.g. X and TikTok), limited edition products featuring specific sponsorship campaigns, alcohol brand logos on match strips, advertising at various locations inside and outside the sporting venues, and alcohol industry representatives featuring in news reports.

The two main alcohol producers identified during our scoping were NBL and UBL. This is consistent with previous research on the alcohol industry's use of social media in Uganda (Lesch et al., 2024). These two producers are the largest in Uganda, with the former owned by AB InBev, and the latter a subsidiary of East African Breweries Limited, in which Diageo is a majority shareholder (NBL, 2024; UBL, 2024). Diageo and AB InBev are two of the largest multi-national alcohol corporations in the world; AB InBev produces a quarter of the world's beer, and Diageo's share of the distilled spirits market is reported as double that of its nearest competitor (Jernigan & Ross, 2020). Both companies have extensive experience of sponsoring individual teams, national sporting organisations, and international sporting mega events such as the FIFA World Cup (Collin & MacKenzie, 2006; Purves, Morgan & Critchlow, 2022). Research looking at the type, placement and content of alcohol marketing in urban areas of Kampala found that most of the advertising represented products owned by AB InBev and Diageo, reinforcing the international influence held by global alcohol producers (Madden et al., 2024).

Much of the sponsorship activity observed in this study positioned the brands as part of Ugandan culture, appealing to consumers and utilising the existing cultural capital and national pride people feel for their country, a tactic found in other sponsorship activities elsewhere in the African region (Dumbili, 2024). In exchange for financial resources, the sponsor gains intangible social and cultural benefits from their partnership with the sporting organisation which enhances their brand image and improves goodwill towards the brand (Yang & Goldfarb, 2015). The findings here demonstrate that alcohol sports sponsorship is multifaceted and draws upon a variety of activities to explicitly promote products or subtly blend them among existing attractive and stimulating content. By associating their products and brands with sports teams, players, and achievements, alcohol producers and distributors can capitalise on the emotional connections that consumers already have with these individuals or teams, thereby increasing their own visibility, appeal, and influence among their target market (Farrelly et al., 2006; Hastings et al., 2010; Purves et al., 2017). Purchasing certain brands becomes an aspiration for the consumer to emulate, or be similar to, their sporting heroes (Siahaya & Smits, 2020). Many social media posts and much of the advertising at the sporting venues featured images of messages related to personal or team glorification. For example, NBL's Cranes campaign specifically incentivised consumers to support their team and share in the team's achievements whilst also encouraging consumers to purchase their products.

There is little information reported in the public domain regarding the total financial value of sponsorship deals for alcohol producers or distributors. The newspaper reports included in this research stress that these sponsorship deals are worth a great deal of money to the sporting organisations, demonstrating how the alcohol industry supports and sustains various sports in Uganda. This implies that if this contribution were to be taken away, the sports would be unable to continue. This framing of transnational alcohol companies as part of the 'social fabric' and 'key economic actors' are part of the wider playbook used by alcohol and other industries internationally to avoid evidence-based policies that would reduce profits (Ulucanlar et al., 2023). The financial contribution made by the alcohol industry has historically been a major argument against implementing restrictions on alcohol sports sponsorship (Mongan, 2010; Purves, Gadsby, et al., 2022). In arguing against the Uganda Alcohol Control Bill, 2023, MPs stated that the Bill would negatively impact the economy, harm businesses, and reduce tax revenues (The Standard Uganda, 2024). It was also argued that guidance is already in place to regulate alcohol marketing practices. However, research has shown that this voluntary guidance is not being followed or enforced (Swahn et al., 2024). Without proper alcohol control policies in place, increased consumption and the harms that follow can diminish the benefits of economic development and bring increased costs to society (Rehm et al., 2024).

There is an established international evidence base which demonstrates that sports teams and organisations are used by alcohol producers to market their products and brands. The findings of this study are consistent with previous research which has explored sponsorship relations in other countries in Europe (Purves & Critchlow, 2020; Purves, Morgan & Critchlow, 2022). Sponsoring sports teams and organisations affords alcohol brands a high level of visibility, either through televised broadcasts of sporting events, those attending matches and events at sporting venues, or via social media. Extensive cue-exposure literature demonstrates alcohol-related imagery triggers heightened alcohol craving, intentions to drink, alcohol attentional biases and actual drinking behaviour (Di Lemma et al., 2015; Hollett et al., 2017). Previous research has shown that exposure to sports sponsorship influences alcohol-related attitudes, beliefs, and consumption amongst consumers, including young people (Brown, 2016; Critchlow et al., 2019; Houghton et al., 2014). A study from Australia also found that risky drinkers were at a greater risk of elevated craving and drinking intentions when exposed to alcohol marketing during sporting events (Hollett et al., 2024). Controls on alcohol marketing, including alcohol sponsorship, are recommended by the World Health Organization (WHO) as one of their three 'best buy' policies to reduce the harmful use of alcohol (WHO, 2013). There are currently no statutory restrictions on alcohol sports sponsorship in Uganda. Research has shown that implementing statutory restrictions on alcohol marketing, including sponsorship, can result in comparatively fewer alcohol sponsors compared to countries with no statutory restrictions, leading to decreased levels of exposure (Purves, Morgan & Critchlow, 2022). Therefore, it is important that

alcohol sponsorship is included in legislation which aims to restrict exposure to alcohol marketing.

Conclusion

These findings show that alcohol sports sponsorship in Uganda is widespread and multi-faceted. The types of sponsorship activities observed in this study mirror those used in other countries around the world. The main industry actors in Uganda were Nile Breweries and Uganda Breweries, subsidiaries of large, multinational alcohol companies. These industry actors use sports sponsorship to position themselves as central to Ugandan culture, heritage and the sustainability of sports across the country. Understanding how sports sponsorship is used to promote alcohol brands across Uganda is important to inform future policy decisions regarding alcohol marketing.

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Declaration of Interests

Richard Purves has previously received research funding for alcohol-related research from the Scottish Football Association (SFA) and Scottish Professional Football League (SPFL). Both organisations have commercial partnerships with unhealthy commodity industry companies, including alcohol producers, which make up less than 10% of their income. The other authors have no interests to declare.

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Reflexivity Statement

This study addresses local research and policy priorities by providing evidence on how alcohol sports sponsorship is carried out in Uganda. Local researchers were involved in all stages of study design, data collection, analysis and write-up. Local researchers were fully costed on the project, and this was covered by the project funding. Research staff involved in data collection are also co-authors on this paper. The study data were stored on a password-protected server which is accessible to all members of the research team, including partners at Makerere University. Data analysis was carried out by researchers at Stirling and Makerere Universities. Researchers at Stirling with more experience of using a case study approach supervised and trained researchers at Makerere throughout the project to develop their skills in data collection, analysis and dissemination.

FORUT provided extra funds to share the research in ways that best suit local needs, the design and conduct of which will be led by partners based in those communities/settings. The lead researcher from Makerere is included as second author on this paper. Safeguarding procedures were used to protect local research staff during data gathering and their work was directly supervised by a senior colleague at Makerere also named as an author.

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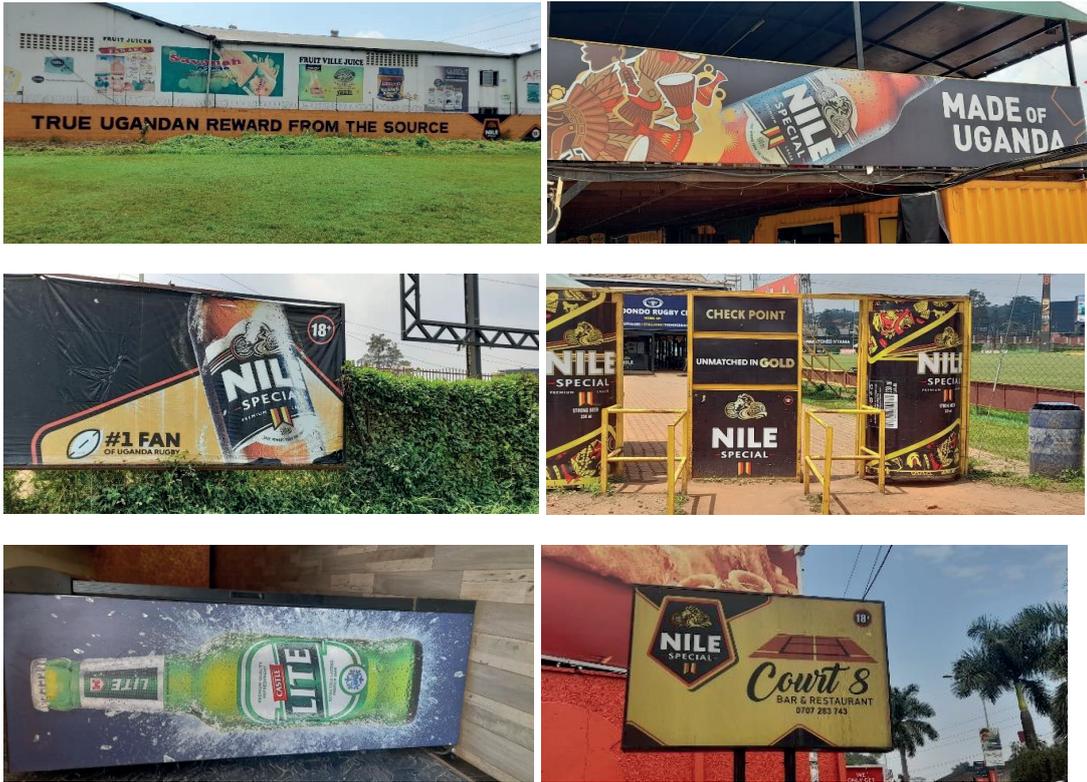
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Appendix 1. Data Sources

Data reference	Source	Web link	Date last accessed
NB1	X	https://x.com/KayangweGodwin/status/1698652073804644453?s=09	10.09.24
NB5	X	https://x.com/FUFADrum/status/1721181014779646062	10.09.24
NB7	Facebook	https://www.facebook.com/search/top/?q=Nile%20Breweries%202022%20-%20Kiplimo	23.10.23 Content now removed
NB9	Tik Tok	https://www.tiktok.com/@radiowestug/video/7178506894426918150?is_from_webapp=1&sender_device=pc	13.09.24
NB10	Tik Tok	https://www.tiktok.com/@radiowestug/video/7178506894426918150?is_from_webapp=1&sender_device=pc	13.09.24
NB11	Sports Nation	https://sportsnation.co.ug/2022/05/06/uganda-rugby-busking-in-sh9-8bn-nile-special-package/	10.09.21
NB12	Uganda Radio Network	https://ugandaradionetwork.net/story/nile-breweries-to-sponsor-fufa-drum-tournament-for-3-years#google_vignette	10.09.24
NB13	FUFA	https://www.fufa.co.ug/marketing-fufa-nile-special-announce-ugx-4-billion-partnership-deal/	10.09.24
NB14	Pulse Sports Uganda	https://www.pulsesports.ug/other-sports/story/nile-special-national-open-resuscitates-pau-pool	10.09.24
NB15	X	https://x.com/NileSpecial/status/1717776141677699567?s=09	10.09.24
NB16	Kawowo Sports	https://kawowo.com/2022/05/06/nile-special-unveils-shs9-8bn-rugby-sponsorship/#:~:text=Uganda%20Breweries%20Limited%20has%20unveiled,their%20flagship%20brand%20Nile%20Special.	10.09.24
NB17	Sports Nation	https://sportsnation.co.ug/2022/11/18/onyango-nile-special-spearhead-cranes-2026-world-cup-campaign/	10.09.24
NB18	Facebook	https://www.facebook.com/search/top?q=nile%20breweries%20limited	23.10.23 Content now removed
NB20	X	https://x.com/NBLUganda/status/1717841382012817728?s=09	10.09.24
NB21	X	https://x.com/NileSpecial/status/1717841887455748254?s=09	10.09.21
NB23	X	https://x.com/AFKampala/status/1698644838365696402?s=09	10.09.23
NB24	X	https://x.com/MbararaCorpClub/status/1703851068231200775?s=09	10.09.24
NB25	X	https://x.com/NBLUganda/status/1728008614437085443?s=09	10.09.24
NB29	Facebook	https://www.facebook.com/search/top/?q=Nile%20Breweries%202022%20-%20Kiplimo	23.10.23 Content now removed
NB31	X	https://x.com/UgandaRugby/status/1733768856353603851?s=09	10.09.24
UB1	X	https://x.com/AndrewOulanyah/status/1698604230909513988/photo/2	13.09.24
UB3	Kawowo Sports	https://kawowo.com/2022/03/08/uganda-premier-league-rewards-uras-timbe-mukwala/	10.09.24
UB4	Chimpreports	https://chimpreports.com/ubl-fuba-enter-multi-million-sponsorship-deal-for-national-basketball-league/	10.09.24
UB6	X	https://x.com/UgandaBreweries?s=09	03.11.23 Access now restricted
UB7	X	https://x.com/UgandaBreweries?s=09	03.11.23 Access now restricted
UB8	Kawowo Sports	https://kawowo.com/2021/10/18/uganda-premier-league-gets-shs-1-billion-boost-fans-to-win-cash-in-prediction-gimmick/	10.09.24
UB9	X	https://x.com/UgandaBreweries?s=09	03.11.23 Access now restricted
UB12	X	https://x.com/UgandaBreweries?s=09	03.11.23 Access now restricted

Appendix 2. Images from site visits featuring Nile Breweries' brands



Appendix 3. Images from site visits featuring Uganda Breweries' brands

