

BRITISH AMERICAN
TOBACCO

23 SEP 2019



17th April 2019

The Minister for Trade, Industry & Cooperatives
Plot 6/8 Parliamentary Avenue
P.O. Box 7103
Kampala, Uganda.



Attention: Hon. Amelia Kyambadde

Honourable Minister,

RE: DRAFT TOBACCO CONTROL REGULATIONS, 2018.

We refer to the Tobacco Control Regulations, 2018 ("the Regulations") a copy of which we have obtained through your office. We appreciate that under section 45 of the Tobacco Control Act, 2015 ("the Act"), the Minister for Health has powers to make regulations in consultation with the Tobacco Control Committee ("the Committee") to give effect to and provide clarity on the provisions of the Act.

We would like to thank the Ministry for this opportunity to provide comments on the Regulations and your commitment to meaningful stakeholder consultation in the regulatory process as enshrined in the Constitution of Uganda and in the Law Reform Commission Act Cap 25. Indeed, as a responsible company we support regulation that is based on robust evidence and thorough research, respects legal rights and livelihoods and delivers on the intended policy aims, while recognising unintended consequences.

Honourable Minister, please find detailed below our comments on the current draft Regulations for your consideration.

A. It is worth noting, Honourable Minister, that BAT Uganda has filed a constitutional petition in court challenging some aspects of the Act. We are alive to the fact that the court's decision on this petition could materially impact the particular aspects of the Regulations and we wish this to be noted and considered in the current process of putting these Regulations in place. In light of this legal challenge to the Act, we respectfully

I certify that this is the Exhibit/
Annexure marked.....
On the Affidavit of.....
Sworn onof..... 20.....
Commissioner for Oaths