



The Republic of Uganda

**REPORT ON MONITORING AND EVALUATION OF
THE NATIONAL COFFEE POLICY 2013**

Compiled by:
Department of Policy Development & Capacity Building,
Office of the President-Cabinet Secretariat
KAMPALA

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TABLE OF CONTENTS

FOREWORD.....	ii
1.0 INTRODUCTION.....	4
2.0 BACKGROUND.....	4
3.0 PROBLEM STATEMENT.....	5
4.0 PURPOSE.....	6
5.0 OBJECTIVES.....	6
6.0 SCOPE.....	6
7.0 METHODOLOGY.....	7
8.0 FINDINGS.....	8
8.1 Summary of Findings.....	9
8.2 Detailed Findings.....	1
8.2.1 Effectiveness of Implementation of the National Coffee Policy.....	1
8.2.2 Relevance of the National Coffee Policy.....	15
8.4 Challenges Faced During Implementation of the Policy	21
8.5 Proposals to Address the Challenges.....	22
9.0 CONCLUSION.....	23
10.0 RECOMMENDATIONS.....	24
11.0 REFERENCES.....	25

FOREWORD

The National Coffee Policy was formulated in 2013 to increase coffee production, value addition and domestic coffee consumption in Uganda. The coffee production was at 3,004,763 bags of 60kg and domestic consumption was at 216,000 bags of 60kg.

The Policy was monitored and evaluated to determine the status of its implementation in terms of effectiveness and relevance by establishing the extent of; change of the problem, achievement of the policy objectives, and implementation of the activities.

The findings revealed that implementation of the policy was on the right course as there was increase in production of coffee from 3,004,763 to 6,203,163 bags of 60kg and domestic consumption increased from 216,000 to 553,900 bags of 60kg all from the period of 2013 to 2019. It was indicated that there was an increase in value addition in terms of increase in the quality and variety of coffee products. This was attributed to effective implementation of the planned policy interventions as 82% of planned activities had been implemented.

I would like to encourage Ministry of Agriculture, Animal Industry and Fisheries and Uganda Coffee Development Authority to enhance implementation of the policy interventions

and carry out more awareness creation to facilitate increase and sustainable production, domestic consumption, exportation and value addition on coffee in Uganda.

A handwritten signature in black ink, appearing to read 'Deborah', followed by a long horizontal line extending to the right.

Deborah Katuramu

**DEPUTY HEAD OF PUBLIC SERVICE AND DEPUTY
SECRETARY TO CABINET**

1.0 INTRODUCTION

This report is on monitoring and evaluation of the National Coffee Policy which was approved in 2013. Implementation of the policy was spearheaded by the Uganda Coffee Development Authority, and Ministry of Agriculture, Animal Industry and Fisheries. The purpose of the policy was to increase coffee production, value addition and domestic coffee consumption for a competitive, equitable, commercialized and sustainable coffee industry. The monitoring exercise was conducted from 10th to 19th August, 2020 with a major focus on the effectiveness and relevance of the policy.

2.0 BACKGROUND

Public policies are put in place as a means of addressing public issues aimed at improving lives of the citizens. The National Coffee Policy was approved in 2013 as a response to the low; coffee production, value addition and domestic coffee consumption in Uganda. The monitoring and evaluation involved assessment of the policy's performance in terms of

effectiveness and relevance. This generated useful information on whether implementation of the policy was on course of achieving its objectives with their aligned activities and addressing the problem.

3.0 PROBLEM STATEMENT

Effective policy management requires that monitoring and evaluation of policy is conducted regularly and progress documented on their performance. However, there was no evidence of monitoring and evaluation of the National Coffee Policy on the extent to which the policy had achieved its objectives and planned activities targeted towards addressing the problem of low; coffee production, value addition and domestic coffee consumption in Uganda. Failure to monitor progress of the policy created a gap on whether the policy was on the right course as planned or not. This may lead to wastage of resources and poor service delivery. There was, therefore need to monitor and evaluate implementation of the policy to assess its performance.

4.0 PURPOSE

To assess the effectiveness and relevance of the National Coffee Policy.

5.0 OBJECTIVES

The objectives of the monitoring and evaluation exercise were:

- i. To assess the extent of change of the problem addressed by the National Coffee Policy.
- ii. To establish the extent of achievement of the National Coffee Policy objectives.
- iii. To determine whether the National Coffee Policy activities were implemented.
- iv. To assess the alignment of the National Coffee Policy problem, objectives with the activities.

6.0 SCOPE

The planned scope of the monitoring and evaluation targeted Ministries, Departments & Agencies (MDAs), selected Local Governments, coffee farmers and consumers. The field activity was conducted between 10th and 19th August 2020.

7.0 METHODOLOGY

Monitoring and evaluation was conducted by staff of Cabinet Secretariat, Office of the President. Literature review was undertaken before the field monitoring activity and contributed to the generation of secondary data. The following was applied:

7.1 Sample and Sampling Method

Uganda Coffee Development Authority (UCDA), Ministry of Agriculture, Animal Industry and Fisheries was the first sampled stakeholder in the exercise because it spearheaded implementation of the policy. Other Ministries, Local Governments and non-state actors were randomly selected for the monitoring exercise. These were; Office of the President, Ministry of Ministry of Public Service, District Local Governments of; Mpigi, Kalungu, Masaka and Mbarara, The National Agriculture Advisory Services (NAADS), Operation Wealth Creation (OWC), and selected coffee farmers and consumers from the visited districts.

7.2 Data Types and Sources

Both primary and secondary data were used in the exercise. Primary data was collected from the identified respondents while secondary data was obtained from the National Coffee Policy and other reports generated by the UCDA.

7.3 Data Collection Methods and Tools

Data was collected through questionnaires, interview guide and document review.

7.4 Data Analysis

Data was analyzed using Microsoft Word and Excel. Presentation of findings was through tables and narrative for better outlay and understanding.

8.0 FINDINGS

The section highlights the summary and detailed findings of the monitoring and evaluation of implementation of the National Coffee Policy.

8.1 Summary of Findings

The key findings of the assessment of policy problem, objectives and activities are indicated below.

- i. There was an increase in the levels coffee production, domestic consumption from 3,004,763 to 6,203,163 bags of 60kg and 216,000 to 553,900 bags of 60kg respectively, and value addition in the coffee produced between FY2012/13 and FY2019/20 (*refer to Chart 1 and 3*).
- ii. 82% of planned activities (23 out of 28 activities) were being implemented.
- iii. All planned activities were relevant towards achieving the policy objectives and addressing the problem.
- iv. Uganda Coffee Development Authority under Ministry of Agriculture, Animal Industry and Fisheries played a big role in ensuring that the policy was effectively implemented.

8.2 Detailed Findings

This section presents details of the assessment of effectiveness and relevance of implementation the National Coffee Policy.

8.2.1 Effectiveness of Implementation of the National Coffee Policy

Assessment of effectiveness involved analysis of the extent of change of the problem, achievement of objectives and implementation of activities. The results of monitoring and evaluation are reflected as follows.

The problem intended to be addressed by the Policy in 2013 was low coffee production, value addition and domestic coffee consumption in Uganda. Despite the fact that coffee was the leading commercial agricultural commodity and major foreign exchange earner accounting for nearly 20 percent of all exports, the levels of coffee production, value addition and consumption were still low. In 2012/13, a total of 3,912,872 60 kg bags of coffee were produced (3,004,763 Robusta and 908,109 Arabica)

of which 216,000 bags were consumed and 3,582,629 bags were exported. 33,579 bags of 60kg of coffee were rejected and referred for reprocessing. In order to address the stated policy problem, 7 objectives and 28 strategic activities were set as indicated in table 1.

The assessment of effectiveness demonstrated the extent of achievement of the planned policy activities which informed whether the planned objectives were achieved, resultantly addressing the problem. This was demonstrated in table 1.

Table 1: Achievement of Policy Objectives and Activities

S/N	Planned Activity	Actual Activity Carried Out
Objective 1: To increase and sustain production and yield at the farm level		
1.	Promote adoption of best agronomic practices at farm level.	Agronomic practices such as wilt disease resistant mother gardens have been promoted at farm level.
2.	Encourage coffee production in new areas and expand acreage in traditional coffee areas.	Coffee production was encouraged in Non-traditional Coffee areas such as; Mbarara, Kiruhura, Kaabong, Kiryandongo, Koboko Yumbe districts.

S/N	Planned Activity	Actual Activity Carried Out
3.	Promote the use of improved varieties.	New Arabica coffee varieties were introduced to withstand some biotic and abiotic constraints.
4.	Improve pest and disease management.	Research to complete novel technologies was prioritised towards addressing pests and diseases. This led to innovations such as disease resistant mother gardens and novel tissue culture protocols developed to improve callus formation and embryo germination from 10% to 80%.
5.	Improve the use of agro inputs in coffee production.	During the FY 2018/19, 96,764 cuttings were cloned, 33,382 rooted-cuttings weaned and 21,943 rooted-cuttings availed to farmers. Additionally, 7,308 tissue culture plantlets/ materials (including new cultures, established cultures and RITAs with germinating embryos) were generated.
6.	Mainstream youth and women into the coffee value chain activities.	Trainings were conducted in Eastern, Western and Northern regions 766 Female and 234 Youth were trained

S/N	Planned Activity	Actual Activity Carried Out
		across 34 districts. The key areas of focus were: good governance, bulk marketing and group dynamics. Annual national barista competitions were organised for the youth.
7.	Ensure environmental and biodiversity conservation is practiced in producing coffee.	Assorted chemicals and equipment for biotechnology and nursery units were procured to ensure environmental and biodiversity conservation.
8.	Promote the availability of water for production at farm level.	Solar water pump and automatic screen-house irrigation system were established for farmers. Water harvesting and irrigation technologies were encouraged among farmers groups.
9.	Promote coffee farming as a business among small holder farmers.	Various sensitisation programs for small holder farmers were undertaken on benefits of coffee as a business enterprise.
Objective 2: To establish a coffee research system that is responsive to the industry's needs		
10.	Set up a Coffee Research Institute as provided for in the National Agricultural Research Systems	The National Coffee Research Institute (NaCORI) was established.

S/N	Planned Activity	Actual Activity Carried Out
	(NARS) Act.	
11.	Put in place a Coffee Research Trust Fund to ensure sustainable financing of research activities.	No information was provided on establishment of a Coffee Research Trust Fund.
12.	Strengthen the linkage between research, development and extension.	The coffee research system has been strengthened through provision of financial assistance to National Coffee Research Institute (NaCORI) to ensure responsiveness to industry research requirements and demands.
Objective 3: To support coffee specific extension within the unified/centralised delivery systems that meets the prevailing industry requirements		
13.	Support coffee-specific extension in every coffee producing district.	UCDA has 44 sub-regions manned by Regional Coffee Extension Officers.
14.	Build capacity of coffee-specific extension service providers.	Extension staff got trained in monitoring & evaluation, effective leadership & performance enhancement, gender & equity, trainer of trainers and open data management.
15.	Support farmer-led extension systems.	Credit sources were availed for access to coffee farmers by Coffee extensions to improve

S/N	Planned Activity	Actual Activity Carried Out
		coffee productivity.
16.	Incorporate coffee extension into tertiary level education curriculum.	No information was provided on incorporation of coffee extension into tertiary level education curriculum.
Objective 4: To support and strengthen coffee farmers' organisations to participate effectively in all the stages of the coffee value chain.		
17.	Mobilize and sensitize farmers to form farmer organizations leading to formation of an Apex body that operates as a business unit.	Conducted farmer mobilisation and sensitization in 15 districts to form farmer organizations
18.	Support farmer organizations to participate at higher levels of the coffee value chain.	A capacity assessment exercise was conducted by Uganda Cooperative Alliance and UCDA in 2018 to identify underlying capacity gaps inherent in coffee farmer organizations/cooperatives to inform development of strategic interventions. A total of 70 farmer organizations/cooperatives from 23 districts and 3 regions (Eastern, Western and Northern regions) were assessed.
Objective 5: To develop and strengthen coffee laws and		

S/N	Planned Activity	Actual Activity Carried Out
regulations at all stages of the coffee value chain.		
19.	Amend and implement the revised National Coffee law.	That National Coffee Bill 2018 was tabled before Parliament for the first reading on 30th April, 2018 and was assented to in 2021
20.	Amend and implement the revised Coffee Regulations.	No information was provided on the revised Coffee Regulations.
Objective 6: To promote value addition at all stages of the coffee value chain.		
21.	Promote primary processing at farm level.	Primary processing factories were annually inspected and remedial actions undertaken.
22.	Promote bulking and export grading at farm/farmers' organization level.	23 coffee roasters 88 exporters, 36 grading companies, and 578 primary processing plants were registered in 2019.
23.	Support increased export of value added products.	In 2019, 4.17 million bags of 60kg of coffee were certified for export. The Kisansa production and value chains were streamlined to prevent mixtures in coffee exports and to maximize its potential as a specialty coffee. There were awareness creation campaigns of coffee sub-sector actors on the attributes

S/N	Planned Activity	Actual Activity Carried Out
		and potential of the species to tap into the export markets for local producers.
24.	Promote and support coffee certification schemes.	Annual test for sanitary and safety parameters were carried out, and the amended Quality safety for certification of coffee exports
25.	Support the establishment of an instant /soluble coffee factory	In FY 2018/19, Uganda's country coffee profile and terms of reference for establishing a soluble coffee plant as well as monitoring and evaluation (M & E) of UCDA activities were developed.
Objective 7: To promote domestic consumption of coffee.		
26.	Create awareness on the benefits of coffee drinking among health professionals and consumers.	UCDA trained farmers and potential farmers on good agricultural practices and advised the public about the benefits of coffee as a business enterprise. Also, information on health benefits of drinking coffee was disseminated.
27.	Build the capacity of local roasters and brewers.	UCDA continuously engaged roasters and brewers through training in green coffee classification using the Agroton scale, roast

S/N	Planned Activity	Actual Activity Carried Out
		identification, cupping and reflected in the number of better finished coffee products/ brands on the market. 147 baristas (32 Females) and brewers were trained in 2019 in brewing techniques and basic machinery operations from across 3 regions (Western, Central, Eastern (Fort Portal, Masaka, Bukomansimbi, Iganga and Jinja)
28.	Develop and institute standards and regulations for the internal marketing of coffee as a final product.	No information was provided on institute standards and regulations for the internal marketing of coffee as a final product.

Majority of the planned activities (23 out of 28 activities) in the policy were being implemented. Implementation of these activities demonstrated the following in terms of achievement of the objectives and addressing of the problem:

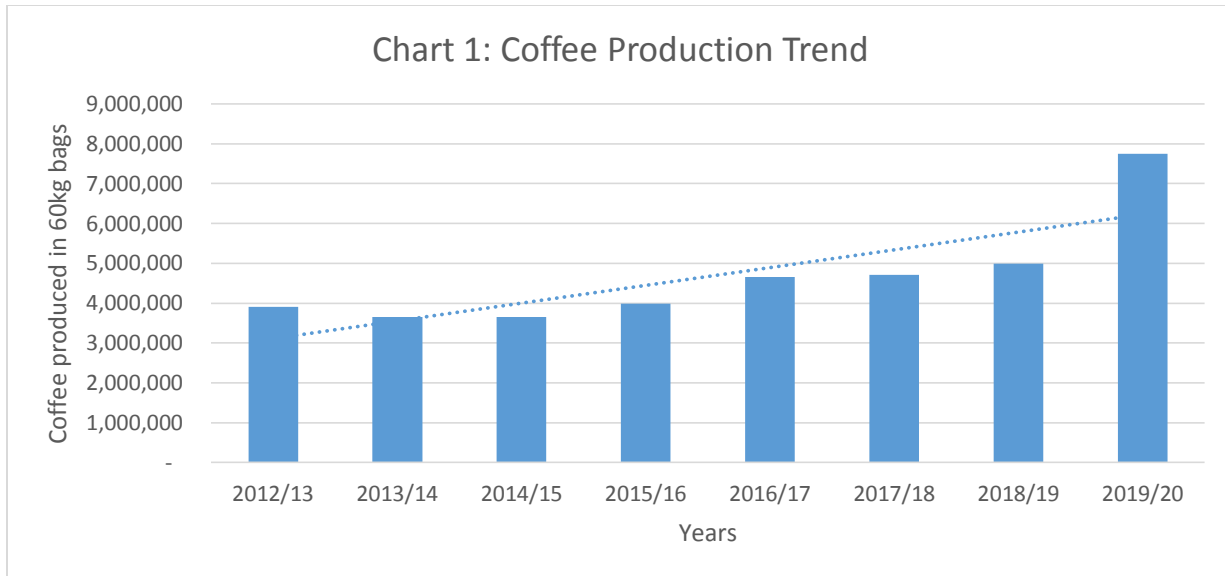
- i. Production and yield of coffee at farm level had increased and was being sustained. From the various reports reviewed, the change in the coffee production was as follows:

Table 2: Coffee Production from FY 2012/13 to FY2019/20

	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20
Robusta (bags of 60kg)	3,004 ,763	2,828 ,831	2,849 ,560	3,018 ,725	3,619 ,314	3,502 ,439	3,745 ,282	6,203 ,163
Arabica (bags of 60kg)	908,1 09	824,0 36	796,9 23	974,6 60	1,033 ,745	1,205 ,158	1,246 ,753	1,550 ,791
Total	3,912 ,872	3,652 ,867	3,646 ,483	3,993 ,385	4,653 ,059	4,707 ,597	4,992 ,035	7,753 ,954

(Source: UCDA Annual Reports of FY 2012/13 to FY2019/20)

There was an average increase of 98% (3,841,082 bags of 60kg of coffee) in the levels coffee production between 2012/13 and 2019/20 with the highest volume of production registered in 2019/20 at 7,753,954 bags of 60kg of coffee. It is further demonstrated by the trend chart 1 below.



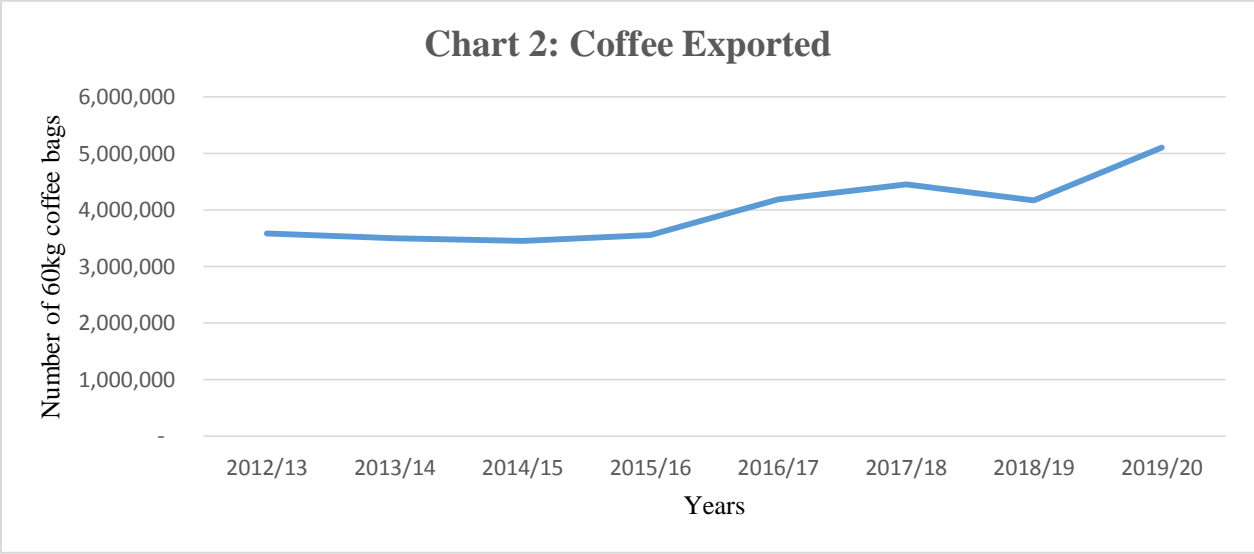
- ii. A biotechnology laboratory with essential equipment and the National Coffee Research Institute (NaCORI) were established which pioneered research to profile bio active compounds in coffee to inform improvements in the quality and value of coffee produced.
- iii. Capacity enhancement engagements of field extension in various fields were conducted and a Geospatial extension monitoring system was established which encouraged technological adaptation, post-harvest services and sustainable coffee production.
- iv. Farmers were continuously trained and sensitized on the best farming practices across the country.
- v. The National Coffee Bill 2018 was tabled before Parliament for the first reading on 30th April, 2018 and was approved in 2021 to provide direction at all stages of the coffee value chain.

vi. There was an improvement in the quality of coffee produced in terms of the fairly average quality outturn and higher screen retention. In 2019, 4.17 million bags of 60kg of coffee were certified for export. The number of coffee bags exported has increased over the years as illustrated below due to improvement in the quality of coffee produced. However there is need to indicate changes in value added at all stages of the coffee value chain. The change in the coffee exported over the years is demonstrated in table 3 and chart 2.

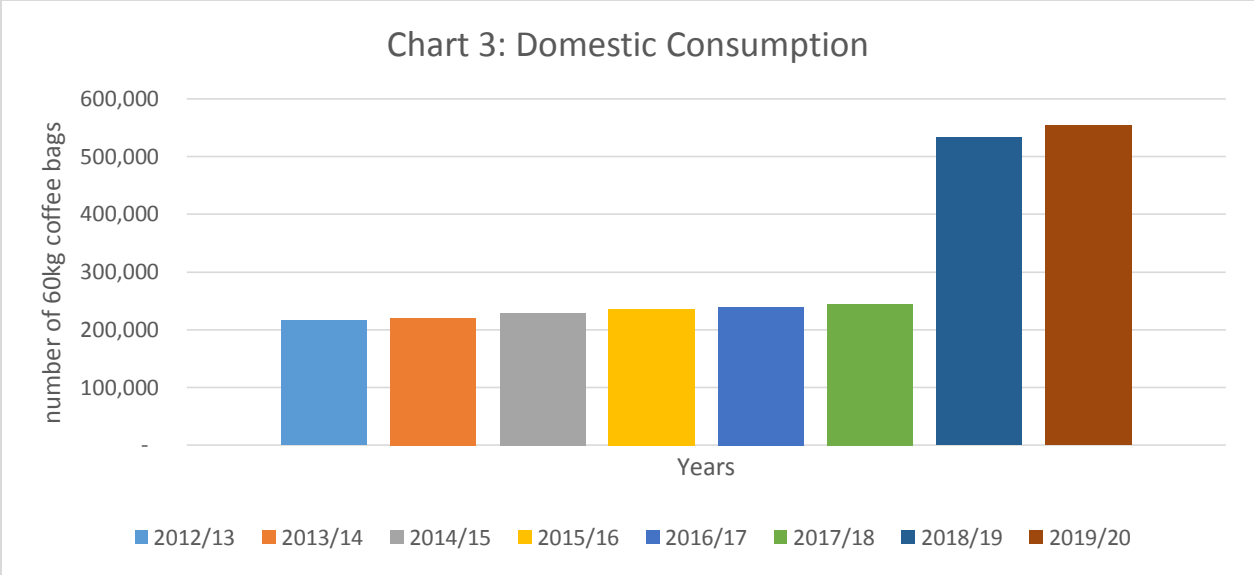
Table 3: Coffee Exported from FY 2012/13 to FY2019/20

	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20
Exports (bags of 60kg)	3,582 ,629	3,499 ,829	3,455 ,852	3,556 ,692	4,185 ,940	4,454 ,214	4,168 ,408	5,103 ,771
Export Reve nues (\$ billio ns)	0.433	0.394	0.411	0.352	0.490	0.492	0.415	0.496

(Source: UCDA Annual Reports of FY 2012/13 to FY2019/20)



vii. Domestic consumption of coffee in Uganda had increased over the years as indicated in chart 3 below. The positive change was as a result of domestic coffee promotion campaigns and trade fairs conducted on an annual basis. 38 trade fairs and 6 campaigns were conducted in 2019.



From the analysis, implementation of the Policy was on the right track towards achievements of the set objectives. There was also a clear demonstration that there was an increase in coffee production, value addition and domestic coffee consumption in Uganda implying a reduction in the problem indicated in the Policy.

However, there is need MAAIF to include baseline data and targets to be met in addressing the problem in terms of; coffee production, consumption and value addition, in the Policy document to enable easy assessment of the change of the problem. This information was obtained from the Reports

prepared by Uganda Coffee Development Authority during analysis. There is also need for MAAIF and UCDA to enhance implementation of the policy activities to completely achieve the planned objectives.

8.2.2 Relevance of the National Coffee Policy

Assessment of relevance involved analysis of the extent to which the achievement of policy activities enabled realisation of the objectives and addressing the problem. The results of the analysis are presented in table

Table 3: Relevance of the Activities in realisation of the objectives and addressing the problem

S/N	Planned Activity	Assessment of Relevance of the Activities in in realisation of the objectives and addressing the problem
1.	Promote adoption of best agronomic practices at farm level.	The intervention is relevant because it will improve the quality and quantity of coffee

S/N	Planned Activity	Assessment of Relevance of the Activities in in realisation of the objectives and addressing the problem
		produced.
2.	Encourage coffee production in new areas and expand acreage in traditional coffee areas.	The intervention is relevant because production in new areas will increase the number of stakeholders in the coffee value chain which will boost production.
3.	Promote the use of improved varieties.	The intervention is relevant because it will improve the quality of coffee produced.
4.	Improve pest and disease management.	The intervention is relevant because it will improve the quality and quantity of coffee produced.
5.	Improve the use of agro inputs in coffee production.	The intervention is relevant because it will improve the quality of coffee produced.
6.	Mainstream youth and women into the coffee value chain activities.	The intervention is relevant because youths and women participating in the coffee value chain activities will increase the number of stakeholders in the coffee value chain which will boost production.
7.	Ensure environmental	The intervention is relevant

S/N	Planned Activity	Assessment of Relevance of the Activities in in realisation of the objectives and addressing the problem
	and biodiversity conservation is practiced in producing coffee.	because it will control environmental degradation and mitigate effects of climate change.
8.	Promote the availability of water for production at farm level.	The intervention is relevant because it will increase access to water by farmers throughout the coffee season.
9.	Promote coffee farming as a business among small holder farmers.	The intervention is relevant because it will increase coffee production, trade, household income and wellbeing of farmers.
10.	Set up a Coffee Research Institute as provided for in the National Agricultural Research Systems (NARS) Act.	The intervention is relevant because it will enable coming up with new innovations of boosting coffee production and value addition.
11.	Put in place a Coffee Research Trust Fund to ensure sustainable financing of research activities.	The intervention is relevant because coffee research will promote sustainability of coffee yields at the global market.

S/N	Planned Activity	Assessment of Relevance of the Activities in in realisation of the objectives and addressing the problem
12.	Strengthen the linkage between research, development and extension.	The intervention is relevant because it will enable coming up with new innovations of boasting coffee production.
13.	Support coffee-specific extension in every coffee producing district.	The intervention is relevant because it will increase access to extension services.
14.	Build capacity of coffee-specific extension service providers.	The intervention is relevant because it facilitates extension service providers with the required knowledge and skills.
15.	Support farmer-led extension systems.	The intervention is relevant because it will increase access to extension services.
16.	Incorporate coffee extension into tertiary level education curriculum.	The intervention is relevant because it will increase the number of professional extension workers in the country.
17.	Mobilize and sensitize farmers to form farmer organizations leading to formation of an Apex body that	The intervention is relevant because this will encourage farmers to join farmer groups and will benefit them with the relevant skills and financial

S/N	Planned Activity	Assessment of Relevance of the Activities in in realisation of the objectives and addressing the problem
	operates as a business unit.	support.
18.	Support farmer organizations to participate at higher levels of the coffee value chain.	The intervention is relevant because this would boost production.
19.	Amend and implement the revised National Coffee law.	The intervention is relevant because the Act guides on the management of Coffee across the value chain
20.	Amend and implement the revised Coffee Regulations.	The intervention is relevant because the Regulations would operationalize the 2021 Coffee Act.
21.	Promote primary processing at farm level.	The intervention is relevant because this will increase the quality of coffee produced.
22.	Promote bulking and export grading at farm/farmers' organization level.	The intervention is relevant because this would boost coffee exports based on market priorities and also increase on the foreign exchange earnings.
23.	Support increased	The intervention is relevant

S/N	Planned Activity	Assessment of Relevance of the Activities in in realisation of the objectives and addressing the problem
	export of value added products.	because it will increase export revenue and resultantly government revenue.
24.	Promote and support coffee certification schemes.	The intervention is relevant because it will enable improvement in the quality of coffee produced.
25.	Support the establishment of an instant /soluble coffee factory.	The intervention is relevant because it will enable production of a wide range of instant coffee products.
26.	Create awareness on the benefits of coffee drinking among health professionals and consumers.	The intervention is relevant because will increase consumption of coffee and health of the masses.
27.	Build the capacity of local roasters and brewers.	The intervention is relevant because it will equip local roasters and brewers with relevant knowledge and skills for value addition.
28.	Develop and institute standards and regulations for the internal marketing of	The intervention is relevant because these standards will regulate internal marketing of coffee as a final product which

S/N	Planned Activity	Assessment of Relevance of the Activities in in realisation of the objectives and addressing the problem
	coffee as a final product.	will boast production.

All activities were relevant towards achieving the objectives addressing the policy problem. Continued implementation of these interventions will lead to complete achievement of the objectives and resultantly lead to increased and sustainable coffee production, value addition and domestic coffee consumption in Uganda.

8.4 Challenges Faced During Implementation of the Policy

Challenges that were being faced during implementation of the policy included:

- i. Limited awareness by some relevant stakeholders of existence of the policy that guides on coffee production and the entire value chain.
- ii. Delayed distribution of seedlings to some coffee farmers.
- iii. Effects of climate change that affect the coffee seasons.
- iv. Distribution of poor coffee seedlings to some farmers.
- v. High cost of pesticides and fertilizers.
- vi. Few extension staff in Districts.
- vii. Limited demonstration gardens in Districts.
- viii. Limited grading of coffee at Factories.
- ix. Farmers are not empowered to determine the price of coffee.

8.5 Proposals to Address the Challenges

The following proposals were made to address the above mentioned challenges:

- i. Establish more coffee demonstration farms in each district to enable coffee farmers get hands-on training.

- ii. UCDA to regulate coffee factories and ensure grading of coffee at farm level to guarantee quality of coffee at that level.
- iii. Strengthen intervention systems for control and management of pests and diseases.
- iv. Increase number of coffee extension staff to help farmers in soil management, spacing, and quality management at farm level among others.
- v. Provide more irrigation schemes and equipment to farmers to guard against crop failure during dry seasons in each region.
- vi. Provision of better agricultural inputs to improve on the quality of coffee produced.

9.0 CONCLUSION

It was established that there was an increase of 3,841,082, 337,900, 1,521,142 bags of 60kg of coffee production and domestic consumption and exports respectively between FY2012/13 and FY2019/20. This in tandem increased value addition and Government revenue from coffee exports. This was

majorly contributed to by the steady fast implementation of the planned policy interventions with 82% of planned activities (23 out of 28 activities) carried out. Uganda Coffee Development Authority and Ministry of Agriculture, Animal Industry and Fisheries played a big role in ensuring that the policy was effectively implemented. Additionally, 26 out of 28 (93%) activities were relevant which indicated that the Policy was on course of achieving its objectives and addressing the problem resultantly lead to increased and sustainable coffee production, value addition and domestic coffee consumption in Uganda.

10.0 RECOMMENDATIONS

The following recommendations should be considered for scaling up achievement and sustainability of the policy objectives and better addressing of the problem:

- i. MAAIF and UCDA should conduct regular monitoring and evaluation to gather information to ascertain the status of implementation of all the relevant activities of the Policy.

- ii. MAAIF and UCDA should consider the suggested proposals under 8.5 to address the challenges faced during implementation of the Policy.
- iii. MAAIF and UCDA should enhance implementation of the policy interventions to facilitate increase of coffee production, value addition and domestic coffee consumption to the desired level in Uganda.
- iv. MAAIF and UCDA should increase awareness creation of the policy interventions to enable involvement of more relevant stakeholders in implementation of the Policy.

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