



# PEOPLE'S FRONT FOR FREEDOM

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Your Ref:.....

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## MEMORANDUM

FROM: PEOPLE'S FRONT FOR FREEDOM (PFF)

TO : THE OFFICE OF THE CLERK TO PARLIAMENT ROOM S 108, SOUTH WING,  
PARLIAMENT BUILDING.

Dear sir,

RE: VIEWS OF PEOPLE'S FRONT FOR FREEDOM (PFF) ON THE PROTECTION OF  
SOVEREIGNTY BILL NO. 13 OF 2026.

We have had the benefit of exhaustively perusing the entire 26 pages of the bill in 5 parts and 30 clauses and we do give our views on the same as here under.

### 1. Clause 1

This clause that deals with interpretation raises several problematic concerns in so far as the definition by using the word "inclusive" is not an exhaustive definition, by defining foreigner to include in (b) **Ugandan residing outside Uganda** discriminates Ugandans living in diaspora and therefore their citizenship and lastly by (f) by **giving the minister powers to declare any person a foreigner by Statutory instrument** puts all Ugandans in a state of extreme anxiety.

The bill uses 14 provisions to create criminal offences vide

- (i) Clause 5(4)
- (ii) Clause 6(4)
- (iii) Clause 7(4)
- (iv) Clause 10(2)
- (v) Clause 11(3)
- (vi) Clause 12(2)



- (vii) Clause 13
- (viii) Clause 14(2)
- (ix) Clause 21(3)
- (x) Clause 22(2)
- (xi) Clause 23(1),(2)&(3)
- (xii) Clause 25(3)
- (xiii) Clause 26(2)
- (xiv) Clause 28(2)

- a) It is our view that criminalising the activities listed in the above clauses is uncalled for and creates too many threats for Ugandans to shoulder.
- b) The penalties set out of ushs. **4,000,000,000/=** and ushs. **2,000,000,000/=** or 20 years or both for the offences in clauses 5(4)(a) and (b), 7(4)(a) and (b), 10(2)(a) and (b), 11(3)(a) and (b), 12(2)(a) and (b), 13(a) and (b), 22(2)(a) and (b) and 23(1)(a) and (b) and 25(3) as well as the ushs. **40,000,000/=** and or 7 years imprisonment in 28(2)(c) and 29(2) and ushs. **1,440,000/=** in **clause 21(3)** are too harsh rendering the entire bill a typical draconian law in the making, (Draco was an extremely harsh legislator of the 7<sup>th</sup> century during the Athenian times who believed in a death sentence for every little frivolous offence(misdemeanours) from whom the term 'draconian laws' was denied)
2. **Clause 2(2)(i)** creates uncertainty in so far as the minister can keep on increasing the list of activities that are a subject of the Bill.
  3. It is also our view that financial matters relating to foreign funding that the bill seems to be so much concerned with are better managed by the Ministry of Finance and Bank of Uganda as opposed to the Ministry of Internal Affairs and the department of peace and security. Matters of sovereignty and promoting Uganda's National interests are better suited to be placed under the Ministry of National Guidance, while matters to do with foreign policy can best be managed by the Ministry of Foreign Affairs and not the Ministry of Internal Affairs. Much as under **clause 3(3)** the department of Peace and security is supposed to consult other Government agencies, including the Ministry of Foreign Affairs on policy, the advice so given after the consultation is not necessarily binding.
  4. Under **clause 4(1)(c)** of the Bill, the department of peace and security is given the latitude to develop and enforce its own guidelines on the registration and regulation of agents of foreigners. This contravenes the principles of natural justice and the principle of separation of powers because the department of peace and security will legislate its own guidelines and execute them (this is giving this department both legislative and executive powers in the same basket).

We should not forget so fast that recently during the January 2026 elections, Uganda's Electoral commission made guidelines ordering voters to return



home after voting yet the principal laws allowed voters to remain at the polling stations within a radius of 20 meters (**section 33** of the presidential Elections Act cap. 179 and **section 49(4)** of the Parliamentary Elections Act cap. 177 all in volume 8 of the Laws of Uganda).

We stand a risk of this department of peace and security coming up with guidelines that contravene both the constitution and Acts of Parliament and bylaws.

5. Under **clause 4(1)(f)** one of the functions of the department of peace and security is to advise the minister on the making of the regulations necessary for the better implementation of the Act. Our view is that the department of peace and security is given too much powers.
6. **Clause 5(2) and (3)** of the bill is unreasonable and ambiguous and too wide in coverage in so far as it forbids engaging in any activity that promotes interests of foreigners against interests of Uganda. Sincerely what does this mean? Does it mean if a person consumes high quality foreign goods and services as opposed to low quality Ugandan goods and services, the person becomes a criminal? If one chooses to support European football clubs like Arsenal or Manchester etc. instead of Uganda football clubs like Buddu F.C, Express F.C etc. will he have become a criminal?

Secondly does Uganda have any law defining what amounts to an interest of Uganda or rather do we have a list of interests of Uganda as a country?

The interpretation clause does not define "interests of a foreigner" nor does it define "interests of Uganda".

7. The law creates very few exemptions which will prejudice charity organisations, humanitarian agencies, rescue situations, good Samaritans including individuals who are philanthropists.
8. **Clause 8(5)** imposes a very high burden. Why should an entire cabinet do what a Government Ministry, department or agency will have already done under **clause 8(4)** giving approval unless the Minister that brought this Bill is also saying that there is no more trust in the other Government ministries, departments and agencies and have become suspects and whatever they do in terms of clearance has to first be re-subjected to cabinet approval?
9. **Clause 10(1)** is not a progressive provision. It forbids promotion of a foreign policy that has not been adopted by cabinet as government policy for example Uganda has never adopted compulsory medical insurance as a policy now if there is a foreign country with such a policy, why shouldn't Ugandans promote it here? In Kenya there is a policy of milk in schools, but under **clause 10** of the bill in any activity or solicited or received or obtained any assistance from



a foreigner to sponsor or organise a meeting or any function with the aim of promoting the Kenya policy of milk in schools in Uganda, will have committed a crime.

10. **Clause 10** contravenes **Article 29** of Uganda's constitution.
11. **Clause 12** does not define what amounts to interfering with the operations of Government and even the interpretation clause is silent.
12. **Clause 13** contravenes **Article 41** and **Article 29(1)(a)**.
13. **Clause 15(2) (b) and (c)** contravenes **Article 27** (right to privacy).
14. **Clause 15(2)(d)** that requires disclosure of not only written terms and conditions **but even what was discussed orally** contravenes **Article 27** of the constitution and principles of confidentiality.
15. **Clause 17(2)** creates a lot of unpredictability.
16. **Clause 21** contravenes **Article 27** (right to Privacy).
17. As for **Clause 27**, the threshold of ushs.400,000,000/= in 12 months which is about ushs.33,333,333.3/= per month is too low and will paralyse the entire banking sector and international money transfers of huge magnitudes yet we badly need this money flow into the country called Uganda.
18. **Clause 22(3)** that provides for almost arbitrary forfeiture without first listening to the ultimate owners of the money or assistance obtained by a person or an agent of a foreigner (e.g. a relative of a Kyeyo/diaspora worker). The ultimate beneficiary could be the remitter or a 3<sup>rd</sup> party such as orphans, elderly, terminally ill patients or a poor community that is at the verge of starving.
19. **Clause 23** is drafted in such a way to create arbitrary strict liability. One would expect use of words like "knowingly" "intentionally" or such words and phrases requiring proof of mensrea.
20. **Clause 23(3)** has introduced something strange akin to reversed criminal liability because under normal circumstances the actions of the agent, employee, principal officers, directors etc. bind the employer/master and the latter becomes vicariously liable but in this case it is the actions of the entity for which the servant/agent is being held vicariously liable!
21. **Clause 22** exempts Government institutions or bodies in which the Government has interests from clearance by the department of peace & security when receiving any foreign funding or assistance. This contravenes **Article 21** of our constitution on equality and freedom from discrimination. Why can't the same exemption be extended to charity organisations and religious institutions and the non-government institutions or philanthropists?
22. The bill contravenes **Article 21(2)** by discriminating people including Ugandans who do not reside in Uganda.
23. **Clause 26** of the bill contravenes **Article 27** (right to privacy).



24. **Clause 28** gives very wide sweeping powers when it comes to inspections most of which contravene **Article 27** (right to privacy).
25. **Clause 29** creates future offences by providing that by breaching any of the regulations made by the minister under the Act one commits an offence punishable by ushs.**40,000,000/=** fine and or 7years imprisonment. This contravenes the doctrine/principle of **Nulla Poena Sine Lege** which is enshrined in our constitution under **Article 28(12)** of the constitution of Uganda-how do you create offences in respect of regulations that are not yet in existence? I mean the minister has not yet made the regulations.

### THREATS CREATED BY THE BILL

The bill has already created extreme fear and anxiety before it is even passed because it is a threat to all Ugandans and non-Ugandans of all walks of life. Below are some of the threats.

- a) By contravening **Article 29 (1)(c)** of the Uganda's constitution, the bill is a threat to religious institutions and will jeopardise freedom of worship.
- b) The bill is a threat to international solidarity that is based on common and universal ideologies, values and aspirations.
- c) The bill is a threat to pan Africanism and the African philosophy of **Ubuntu**. The central tenet of the African philosophy of **UBUNTU** is "I am because we are and since we are therefore I am".
- d) The bill is a threat to good Samaritans that always help those in trouble irrespective of the state borders provided they comply with migration laws.
- e) The bill is a threat to rescue situations.
- f) The bill is a threat to international sports, music etc.
- g) The bill is a threat to cross border cultural practices by people that cross borders e.g. the Bagisu and Sabiny of Uganda and Kenya, the Bakonjo of Uganda and DRC, the Banyoro of Uganda and DRC, the Alur of Uganda and DRC, the Banyarwanda of Uganda and Rwanda, the Kakwa and Acholi of Uganda and Southern Sudan contrary to **Article 37** of Uganda's constitution.
- h) Political activities are in bigger trouble including NRM since all the constitutions of our political parties including NRM have diaspora leagues and allies beyond Uganda.
- i) The bill is a threat to Ugandans who survive on foreign aid and relatives abroad.



- j) All of us are under threat since according to **clause 1(f)** the Minister can by Statutory Instrument declare any of us a "foreigner" and this he can do without even first invoking the entire cabinet.
- k) Persons involved in self-help projects as in '**bulunji bwansi**' are in bigger trouble.
- l) Persons involved in community fund raisings to raise money to fund activities that Government or local governments have failed to do as part of their core functions e.g. cancer run, HIV run, sickle cell run, fundraisings to set up infrastructure in Government schools, health centres, hospitals etc.
- m) Beneficiaries of bursaries from foreigners will also suffer which will in turn be a violation of their right to education guaranteed under which **Article 30** of the constitution of Uganda.
- n) Activists involved in defending rights and freedoms including civic rights and activities provided for under **Article 38** of the constitution of Uganda.
- o) **Article 3** is also under threat since Ugandans will be arrested for doing whatever is within their means locally and internationally to defend the constitution of Uganda.
- p) **Article 29** is also under threat since freedom of association, assembly, movement, conscience, expression, religion etc. are completely fettered.
- q) Uganda's GDP too is under threat. Diaspora/Kyeyo remittances in early 2026 based on the April 2026 Bank of Uganda data reached a record USD **2.5 billion** (approximately ushs. **9.25 trillion**) for the full year of 2025 contributing approximately **3.8%** of Uganda's GDP.
- r) Threat to media contrary to **Article 29(1)(a)** and the bill is killing even the gains we had registered in the supreme court case of **Charles Onyango Obbo & Andrew Mwenda vs. Attorney General S.C.C.A No.2 of 2022** (a case that decriminalised publication of false news) and the clause among other clauses in the bill that is killing this, is **clause 13**. Even getting airtime from a foreigner to make a phone call to participate in a public debate meant to influence government policy will require clearance from the department of peace and security.
- s) A threat to Uganda's International obligations as contained in the numerous treaties, conventions, charters to which Uganda is a signatory.

As People's Front for Freedom (PFF), in brief, we take the strong view that this bill is a coup d'état against the Ugandans, the Republic of Uganda and its constitution in so far as;

1. This bill is another penal law meant to cover up for the Government's failures to fulfil its core obligations akin to a family head who should provide basics of life to his children but also does not want neighbours



- or anyone else to assist the starving, naked, homeless children that he has neglected.
2. The bill is brought in bad faith and only meant to stifle efforts of Ugandans to seek survival alternatives outside begging from the Government a.k.a "**TUSABA GAVUMENTI ETUYAMBE**".
  3. The bill has the intended negative effect of completely closing all the tiny vent holes that had remained open through which Ugandans could access some little oxygen to ignite their demand for our rights and freedoms that are inherent and not state granted.

### WAY FORWARD

We are of the considered view that the existing laws listed below (among the so many already in existence), are sufficient to address whatever imaginary concerns/fears Government could be having and there is no need of loading more burdens on the already weakened shoulders of Ugandans.

1. Anti-money Laundering Act 2013 cap.118.
2. Anti-money Laundering Regulations 2015.
3. Financial Institutions Act cap. 57.
4. Public Finance Management Act cap.171.
5. Uganda citizenship and Immigration control Act cap. 313.
6. Refugees Act Cap. 312.
7. Registration of persons Act cap. 332.
8. Security Organisations Act Cap. 327.

We do submit that the most honourable thing **Maj. Gen. (Rtd) Kahinda Otafiire Minister of Internal Affairs** should do to save Government and Uganda from embarrassment is to withdraw this draconian bill because the harsh and unreasonable limitations in the bill are beyond what is acceptable and demonstrably justifiable in a civilised, free and democratic society.

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**TUGUME KIBOTTO BYENSI MOSES AMOOTI**  
**ATTORNEY GENERAL PEOPLE'S FRONT FOR FREEDOM (PFF)**

- cc. All Ugandans
- cc. All members of Parliament of Uganda
- cc. Media

