### ASIA PACIFIC REGIONAL CLUSTER MEETING SHANGRI-LA HOTEL, BANGKOK, THAILAND 14-18 FEBRUARY 2022

## REGIONAL EPIDEMIC AND RESPONSE: CHALLENGES AND OPPORTUNITIES

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## **Regional snapshot of HIV infections and AIDS-related deaths**







Prepared by <u>www.aidsdatahub.org</u> based on UNAIDS. (2021). UNAIDS HIV Estimates 1990 – 2020

# New HIV infections, people living with HIV and AIDS-related deaths in Asia and the Pacific, 1990-2020



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Prepared by www.aidsdatahub.org based on UNAIDS. (2021). UNAIDS HIV Estimates 1990 - 2020

## Ending AIDS is possible, but a course correction is needed to make it a reality: Progress in declining new infections globally and regionally



### New HIV infection trends vary greatly by country, by population and by age group in Asia and the Pacific

Percentage change in new HIV infections by country, Asia and the Pacific, 2010-2020





# A significant variation in new HIV infections trends in Asia and the Pacific countries



Source: Prepared by www.aidsdatahub.org based on UNAIDS 2021 HIV Estimates

## High and/or rising HIV prevalence among key populations in selected hotspots, 2007-2020



Source: Prepared by www.aidsdatahub.org based on 1) Integrated Biological and Behavioral Surveillance Surveys; 2) HIV Sentinel Surveillance Surveys

### Diverse epidemic trends in Asia and the Pacific: Expanding share of new HIV infections among men who have sex with men:

Proportion of new HIV infections by population group



Source: Prepared by www.aidsdatahub.org based on country submitted AEM-Spectrum HIV estimates files for 2021 HIV estimates

partners of key populations

## Trend data on the proportion of newly reported HIV cases attributable to homosexual transmission, 1990 - 2021



Source: Prepared by www.aidsdatahub.org based on 1. National Epidemiology Center Philippines. (2021). Philippines HIV/AIDS Registry: December 2021; 2. Ministry of Health Malaysia (2021); 3. Heisei 29 (2017) year old vivid annual report. (January 1 to December 31); Retrieved from <a href="http://api-net.jfap.or.jp/status/2017/17nepo/17ne

### Need for focused response in HIV: Epidemic mostly affecting key populations and their partners, but HIV prevention services are lagging behind the targets



Comprehensive HIV prevention coverage among key populations in Asia and the Pacific, 2016-2020



Note: regional median calculated based on twelve reporting countries for female sex workers and gay men and other men who have sex with men, seven reporting countries for transgender people, and nine reporting countries for people who inject drugs.

Source: Prepared by www.aidsdatahub.org based on UNAIDS special analysis, 2021 and Global AIDS Monitoring (GAM) Reporting

## Legal and policy trends impacting the lives of PLHIV and key populations, 2014-2019

	PLHIV			MSM	TG	Sex workers			PWID	Prisoners
	Discrimination prohibited against people living with HIV	HIV travel or migration restriction	Offence for HIV transmission, exposure or non- disclosure	Consensual sex between adult men illegal	Legal recognition of change of gender	Sex work in private illegal	Soliciting for sex work illegal	Sex work regulated and/or permitted in some locations	Compulsory centers for people who use drugs	Access to opioid- substitution therapy in prisons
Afghanistan										
Australia										
Bangladesh										
Bhutan										
Brunei										
Cambodia										
China										
DPRK										
Fiji										
India										
Indonesia										
Japan										
Lao PDR										
Malaysia										
Maldives										
Mongolia										
Myanmar										
Nepal										
New Zealand										
Pakistan										
PNG										
Philippines										
ROK										
Singapore										
Sri Lanka										
Thailand										
Timor-Leste										
Viet Nam										

The law or policy provides an enabling environment for HIV responses

Punitive law or policy; there is no enabling law or policy; the law or policy does not provide an enabling environment for HIV responses

Partially enabling; enabling but subject to significant limitations; some aspects of the law or policy are punitive

Information is unavailable or unclear



### Laws and regulations that allow adolescents (10-19 years) to seek services without parental consent, countries where data is available, 2019

Country (reporting period)	Contraceptive services except sterilization	Emergency contraception	Harm reduction intervention for injectable drug users	HIV testing and counselling services	
Afghanistan (Apr 2016, 2019)					
Bangladesh (Feb 2014, 2019)*					
Bhutan (Jan 2016)					
Brunei Darussalam (Feb 2014, 2019)					
Cambodia (Mar 2016, 2019)**					Yes
China (2019)					
Fiji (2018)					No
India (Feb 2014, 2019)*					
Indonesia (Apr 2016, 2018)***					No information
Kiribati (Jun 2014)					
Lao PDR (Mar 2016, 2017)**					
Malaysia (Mar 2016, 2019)*					
Maldives (Jan 2010)					
Marshall Islands (Apr 2016)					
Micronesia (Federated States of) (Mar 2016)					
Mongolia (Mar 2016, 2019)*					Note: Asterisks refer to HIV testing and
Myanmar (Apr 2016, 2019)					counseling services
Nepal (Jan 2014, 2019)***					**for adolescents younger than 18 years
Pakistan (Dec 2016, 2019)*					*** for adolescents younger than 16 years
Palau (Apr 2016)					
Papua New Guinea (Jan 2014, 2019)*					Source: Prepared by <u>www.aidsdatahub.org</u> based on information from countries that
Philippines (Mar 2014, 2019)*			<u>.</u>		responded to the Global Maternal, Newborn,
Solomon Islands (Mar 2016)					Child and Adolescent Health Policy Indicator Surveys (2009-10, 2011-12, 2013-14, 2016)
Sri Lanka (Apr 2016)					undertaken by Department of Maternal,
Timor-Leste (Apr 2016)					Health Organization -
Vanuatu (Dec 2013)					http://www.who.int/maternal_child_adolescent/
Thailand (2018)					04 Sept 2019); and National Commitments
Viet Nam (Jan 2014, 2019)***					and Policies Instrument of Global AIDS Monitoring (GAM) 2017,2018, 2019 and 2020)

# Lagging behind prevention targets : time to re-energize and make use of innovations and advances in HIV prevention

Prevention intervention coverage among key populations, select countries, Asia and the Pacific, 2016–2020



Source: Prepared by www.aidsdatahub.org based on Global AIDS Monitoring (GAM) Reporting

### Status of PrEP availability and number of PrEP users in Asia and the Pacific, 2020



## Young key populations are at profound risk of HIV but NOT reached with HIV services



Source: Prepared by www.aidsdatahub.org based on Integrated Biological and Behavioural Surveys, and UNAIDS 2021 HIV Estimates

## 10 countries\* account for 97% of all new HIV infections among young people (15-24) in the region and trends diverse greatly in Asia and the Pacific countries

Percentage change in new HIV infections among young people (15-24) by country, 2010-2020





#### Getting to zero

# Urbanization, digital growth and rising HIV epidemics among young MSM



#### **Digitalization and MSM epidemic**

**HIV incidence** is

**2**X higher

among those who

networking apps

use geosocial

HIV incidence rate based on an 18-month cohort study in Shenyang, China



Use geosocial networking apps to seek sex partners

Higher incidence among geosocial networking apps users in Shenyang, China



#### Sex workers

People who inject drugs

Men who have sex with men

Transgender women

Clients of sex workers and partners of key populations

Rest of population

Source: Prepared by <u>www.aidsdatahub.org</u> based on Integrated Biological and Behavioural Surveys; Xu, J.et al. (2018). The Effect of Using Geosocial Networking Apps on the HIV Incidence Rate Among Men Who Have Sex With Men: Eighteen-Month Prospective Cohort Study in Shenyang, China. J Med Internet Res, 20(12); Mao, X et al. (2018). HIV incidence is rapidly increasing with age among young men who have sex with men in China: a multicentre cross-sectional survey. HIV medicine, 19(8), 513-522.

# Digitalization and its consequences: changing pattern of meeting and finding sex partners

% of MSM who used internet to find sex partners

(among those who are physically recruited through Integrated Biological and Behavioural surveys)







## Status of needle–syringe programmes and opioid substitution therapy coverage among people who inject drugs in Asia and the Pacific, 2019-2020



Source: Prepared by www.aidsdatahub.org based on Global AIDS Monitoring (GAM) Reporting

## Half a million people in compulsory treatment annually

	2012	2018
Cambodia	2,600	4,746
China	319,000	317,000
Lao PDR	3,915	4,000
Malaysia	5,473	4,660
Philippines	2,744	5,447
Thailand	112,589	117,465
Viet Nam	27,920	25,400

See Booklet 2, pg 13 for data sources and further information.

Percentage change in the number of people detained in compulsory facilities, 2012–2018



Since 2012, the number of people in compulsory treatment:

- Increased in four countries
- Decreased in three countries



## Status of compulsory detention centers and diversion from prisons to community services in Asia Pacific

	Compulsory centers for	Diversion from prisons
	people who use drugs	to community services
Afghanistan		
Australia		
Bandladesh		
Bhutan		
Brunoi		
Combodia		
Chipa		
Fiji		
Indonesia		
Japan		
Lao PDR		
Malaysia		
Mongolia		
Myanmar		
Nepal		
New Zealand		
Pakistan		
PNG		
Philippines		
Republic of Korea		
Singapore		
Sri Lanka		
Thailand		
Timor-Leste		
Viet Nam		

#### Compulsory centers for people who use drugs

- Countries do not have compulsory centers for people who use drugs
- Countries\* have compulsory centers operated by government agencies that meet the definition of compulsory centers for people who use drugs of the 2012 United Nations Joint Statement;
- Countries\*\* have compulsory systems for treatment and rehabilitation that operate treatment centers that have some of the features of compulsory centres for people who use drugs as described in the 2012 United Nations Joint Statement

#### Diversion from prisons to community services

- Country has system for diversion of people who use drugs from prison or detention to treatment or services in the community without threat of legal sanctions for noncompliance
- No system for diversion of people who use drugs from prison or detention to treatment or other services
- Country has system for diversion of people who use drugs from prison or detention to treatment or services in the community, but with threat of legal sanctions for noncompliance

#### Note:

\* in these countries, compulsory centers for "treatment" or "rehabilitation" of people who use drugs exist where due process rights are limited or absent or human rights violations have been documented

\*\* countries with nongovernmental organization, faith-based or private centres where human rights abuses have been reported; punitive systems for compulsory treatment (or) rehabilitation but where there is insufficient information (e.g. evidence of human rights abuses, substandard conditions, absence of due process rights) to conclude that the centres fully meet the definition of the 2012 United Nations Joint Statement

### **Overlapping risks: our data collection systems agile enough to track** the emerging risks?



12

5

3.2

3.8

3

5.9

10.2

10.4

5

10

15

Source: Prepared by www.aidsdatahub.org based on 1) Integrated Biological and Behavioral Surveys; 2) Behavioral Surveillance Surveys

## **ChemSex** (Sexualized drug use )

### -- Risks associated with the transmission of HIV, HBV and STIs

-- A wide variation in prevalence of ChemSex among MSM group

### > Unprotected sex

Inconsistent condom use /Condomless,

Multiple sexual partners

Prolonged sex course (Condom break, Bleeding trauma)

Affect the capacity to negotiate and adhere to safer sex

### Unsafe injection

Slamming (SIDU)/ blasting High frequency of injecting stimulant

Sharing needles, syringes and other commodities

Poly drug use ( Yaba, "speedball" or "goofballs")

➢ Overdose

Unknown HIV/AIDS status: HIV/hepatitis/ STDs and ChemSex
Social vulnerabilities: TG, SW, women and sexual violence

## Emerging risk associated with Chemsex among men who have sex with men and transgender in Asia-Pacific Region

First Chemsex Study among MSM in Viet Nam, 2019



Viet Nam", and Dr. Nittaya Phanuphak IHRI, Thailand. "A chemsex curriculum for KP lay providers" presented at Asia Chemsex Webinar, 2020

## **Chemsex, emerging risk HIV in Asia Pacific**



## About half of key populations do not know their HIV status, but assisted testing and self-testing could increase the rates of HIV diagnosis





Source: www.aidsdatahub.org based on National Commitments and Policies Instrument of Global AIDS Monitoring (GAM) 2021

## **Status of HIV self testing (HIVST) in national policies**

Situation as of June 2020



Source: Global AIDS Monitoring (UNAIDS/WHO/UNICEF) and Global HIV, Hepatitis and STIs Programmes (HSS), WHO, 2020

# **Cambodia example:** Innovations and differentiated service delivery – Solutions to address inequalities and barriers in access to HIV service

Increased HIV testing and yield through virtual outreach

Men who have sex with men



Source: Prepared by <u>www.aidsdatahub.org</u> based on 49th UNAIDS Programme Coordinating Board (PCB), Dec 2021. Thematic Segment Case Studies: What does the regional and country-level data tell us, are we listening and how can we leverage that data and related technology to meet our 2025 and 2030 goals?



# India: Innovations in service delivery – Solutions to address barriers in access to HIV service

Index testing cascade with high HIV yield and linkage to treatment, 2021





### **Regional overview: 95-95-95 Treatment target and gaps**

HIV testing and treatment cascade, Asia and the Pacific, 2020

95-90-86 target



Prepared by www.aidsdatahub.org based on UNAIDS. (2021). UNAIDS HIV Estimates 1990 - 2020

### **Regional overview: Treatment target and gaps**

HIV testing and treatment cascade, Asia and the Pacific, 2019 & 2020





# closing the gaps along continuum of care cascade in all <u>settings</u> and maximize the benefits of U=U

## Narrowing the gaps along the treatment cascade in Asia and the Pacific, 2015 -2020



PLHIV who do not know their HIV status

- Ø Gap between 1st and 2nd 95 targets (Know the status but not on ART)
- ø Gap between 2nd and 3rd 95 targets (PLHIV on ART and do not have viral suppression)
- PLHIV on ART with viral suppression

#### UNDETECTABLE = UNTRANSMITTABLE:

- PLHIV on antiretroviral therapy who have HIV viral suppression to undetectable levels will not transmit HIV sexually.
- Ensure that all PLHIV have access to quality treatment as soon as they are diagnosed and retain in care.
- □ U=U respond to stigma and motivate efforts to have viral suppression and continue follow-up care.
- Needs to have better access to viral load assays at affordable prices, combined with effective laboratory systems and robust health services.
- combination prevention strategies (including PrEP and Condom) remain a key part of the HIV response as primary prevention tools

## The pace of treatment scale up is not fast enough to catch up with the treatment targets: uneven progress in Asia Pacific countries



Distribution of countries (n=20) with respect to the evolution of gaps to the first and second 90s



Prepared by www.aidsdatahub.org based on UNAIDS 2021 estimates, Global AIDS Monitoring and country reports

## **COVID-19 PANDEMIC DISRUPTS THE GLOBAL AIDS RESPONSE:** Resilient responses are needed to ensure access to HIV services



Comparison of net treatment scale-up in 2019 and 2020 by country



## Current treatment scale-up has made significant achievements, but Asia and the Pacific region is lagging behind the global trend



ART coverage and treatment gap, Asia and the Pacific, 2020



Prepared by www.aidsdatahub.org based on UNAIDS. (2021). UNAIDS HIV Estimates 1990 – 2020

## Knowledge of status but not on treatment: linkage and service delivery gap between 1st and 2nd 95



PLHIV aware of their HIV status but NOT on treatment

PLHIV aware of their HIV status and on treatment

Possible to start ART on the same day as HIV diagnosis

NOT possible to start ART on the same day as HIV diagnosis

No info

Source: <u>www.aidsdatahub.org</u> based on National Commitments and Policies Instrument 2019, 2020, and UNAIDS, WHO. Laws and Policies Analytics https://lawsandpolicies.unaids.org/topicresult?i=414&lan=en and Global AIDS Monitoring (GAM)

## Late diagnosis in Asia and the Pacific: a cause for concern

Proportion of PLHIV who have had initial CD4 count in 2020 by CD4 level

Philippines	55%	219	<b>6</b> 24%				
Thailand	53%		20%	27%			
Singapore	50%		22%	28%			
Nepal	49%		26%	25%			
Lao PDR	·	15%	36%				
Afghanistan 45%			24%	31%		CD4<200	
India	41%		35%	24%			
Iran	41%	16	%	43%			
Malaysia 41%			24%	36%		CD4 200-350	
Bhutan	40%		28%	33%			
Cambodia	34%	26%	9	40%		CD4>350	
China	China 33%		5%	34%			
New Zealand	32%	18%		50%			
Sri Lanka	Sri Lanka 30%		47%				
Mongolia	27%	27%		46%			
00	% 20%	40%	60%	80%	100%		



Prepared by www.aidsdatahub.org based on Global AIDS Monitoring Reporting 2021

## Treatment saves lives: scale-up life-saving treatment to prevent deaths and onward HIV transmission



\* ART coverage for China is calculated based on number of people on ART reported in GAM and country endorsed estimate of PLHIV

Prepared by <u>www.aidsdatahub.org</u> based on Global AIDS Monitoring 2021 Reporting and UNAIDS 2021 HIV Estimates

# How to explain high mortality even when treatment coverage is high?







\*ART coverage for China is calculated based on number of people on ART reported in GAM and country endorsed estimate of PLHIV

2<sup>nd</sup> 95 target

Prepared by www.aidsdatahub.org based on Global AIDS Monitoring 2021 Reporting and UNAIDS 2021 HIV Estimates

# HIV drug resistance: an urgent need to address the leakages in treatment continuum, and improve quality of treatment services



Chantratita W, Pasomsub E, Leechawengwongs M, Thipmontree W, et al. (2016) Prevalence of Primary HIV Drug Resistance in Thailand Detected by Short Reverse Transcriptase Genotypic Resistance Assay. PLoS ONE 11(2): e0147945. doi:10.1371/journal.pone.0147945

# India: Innovations and differentiated service delivery – Solutions to address inequalities and barriers in access to HIV service



#### Decline in interruption of treatment, Andhra Pradesh





Social justice and human rights are fundamental to address the health needs of key populations

41% 2 out of 5 Female sex workers were forced to have sex in the last year in Madhya Pradesh, India

**38% 1** out of **3** Men who have sex with men avoided seeking health care due to stigma in Yangon, Myanmar

71% 2 out of 3 Women who use drugs have unmet need for reproductive health care in Malaysia

18% 1 out of 5 Transgender women have been denied/thrown out of a housing in their life time in Cambodia



## **Eliminate gender inequalities**

Women who have experienced intimate partner violence in Asia and the Pacific region, as of 2019



Women who have experienced intimate partner violence\* in the past 12 months

\*physical and/or sexual violence



Source: Prepared by <u>www.aidsdatahub.org</u> based on UNFPA (2021) Measuring prevalence of violence against women in Asia-Pacific, <u>https://asiapacific.unfpa.org/en/knowvawdata</u> (accessed Feb 2022)

# Give the voice to the voiceless – End gender inequalities and gender-based violence

Women who never disclosed intimate partner violence



## Women who sought health services at least once for intimate partner violence



## Towards ending AIDS in children starts with mothers: time to improve linkages and prevent leakages

Service cascade of prevention of mother-to-child transmission of HIV in Asia and the Pacific, 2020





# Efforts are needed to eliminate new HIV infections among children (0-14 years) in Asia and the Pacific

Prevention of mother-to-child transmission (PMTCT) coverage, Global and Asia and the Pacific, 2010-2020





## **Regional overview: Prevention of mother-to-child transmission**

#### Pregnant women living with HIV who received ARVs to reduce the risk of mother-tochild transmission of HIV, 2020





Source: Prepared by www.aidsdatahub.org based on UNAIDS 2021 HIV Estimates

## Though new HIV infections among children in Asia and the Pacific declined by 32%, the region still missed the 2020 Fast-Track target by 11 000

New HIV infections among children in Asia and the Pacific, 2000-2020





## High TB-HIV burden in Asia and the Pacific, 2020

68% of estimated new TB cases globally

6.7м

847ĸ

## 147k 19% of estimated TB-HIV co-infections globally

**57**% of estimated TB mortality globally

Source: Prepared by www.aidsdatahub.org based on WHO. (2021). Global TB Report 2021



# INTEGRATE HIV INTO SYSTEMS FOR HEALTH: Integrated efforts are needed to close the health service gaps

Proportion of tuberculosis patients living with HIV who are on antiretroviral therapy





## ASIA AND THE PACIFIC: TB-HIV CO-INFECTION





### Double disease burden of HIV and HCV among PWID in Asia and the Pacific



of all people who inject drugs globally are living in Asia and the Pacific



of all people who inject drugs in Asia and the Pacific are **living with HIV** 



of all people living with HIV Asia and the Pacific are **people** who inject drugs



of people who inject drugs in Asia and the Pacific are **co-infected with hepatitis C** 

Prepared by <u>www.aidsdatahub.org</u> based on Global prevalence of injecting drug use and sociodemographic characteristics and prevalence of HIV, HBV, and HCV in people who inject drugs: a multistage systematic review, Degenhardt, Louisa et al. The Lancet Global Health, Volume 5, Issue 12, e1192 - e1207; Prevalence and burden of HCV co-infection in people living with HIV: a global systematic review and meta-analysis, Platt, Lucy et al. The Lancet Infectious Diseases, Volume 16, Issue 7, 797 - 808



## HIV and hepatitis prevalence among people who inject drugs by region

South Asia



Prepared by www.aidsdatahub.org based on Global prevalence of injecting drug use and sociodemographic characteristics and prevalence of HIV, HBV, and HCV in people who inject drugs: a multistage systematic review, Degenhardt, Louisa et al. The Lancet Global Health, Volume 5, Issue 12, e1192 - e1207

## FULLY RESOURCE AND SUSTAIN EFFICIENT HIV RESPONSES: Resource availability and resource needs in Asia and the Pacific



## Investment mismatch – unequal investment on key population HIV

prevention programmes



Proportion key populations out of total new HIV infections

Key populations HIV prevention spending out of total HIV Expenditure



## Prevention spending per key population, countries where data are available







## **ART coverage VS per capita expenditure on ART**



\* Per capita expenditure calculated as total expenditure on ART divided by number of PLHIV on ART

Source: Prepared by www.aidsdatahub.org based on UNAIDS HIV Estimates 2021, UNAIDS HIV Financial Dashboard and Country NASA Reports

**B:** High ART coverage, high per capita expenditure



## Indonesia: Care and treatment cascade and fiscal contributions





Dashboard



### Papua New Guinea: Care and treatment cascade and fiscal contributions





Dashboard

### Nepal: Care and treatment cascade and fiscal contributions





Source: Prepared by <u>www.aidsdatahub.org</u> based on UNAIDS 2021 HIV Estimates and UNAIDS Financial Dashboard

## Thailand: Care and treatment cascade and fiscal contributions



Dashboard



## **THANK YOU!**

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Number of countries



## Asia Pacific countries with mechanisms in place to promote access to justice, most recent data







### Asia Pacific countries with Mechanisms in place to record and address HIV-related discrimination cases





### A snapshot of inequalities: Availability of prevention and care services in prisons

	Needle and syringe programmes available in prisons	Opioid substitution therapy (OST) programmes available in prisons	Condoms and lubricants available to prisoners	HIV test systematically offered at entry and/or exit	Antiretroviral therapy accessible to all prisoners living with HIV	Hepatitis C treatment (using direct-acting antivirals) available in prisons
Afghanistan	No			Yes	Yes	No
Australia	No	Yes		Yes	Yes	No info
Bangladesh	No			No	Yes	No
Bhutan	No			Yes	No info	No info
Brunei Darussalam	No	No /	No 🛛 💛	No info	No info	No info
Cambodia	No	No	No	Yes	Yes	No info
China	No	wwwalaids	data qub o	Yes	Yes	Yes
Fiji	No	_www.aid	isdatanub.	OFC Yes	Yes	No info
India	No		No	No	Yes	No info
Indonesia	No	Yes		Yes	Yes	No
Japan	No	No	No	No	No info	No info
Lao PDR	No	No	No	No	Yes	No
Malaysia	No		No	Yes	Yes	Yes
Mongolia	No	No	No	No	No info	No info
Myanmar	No		No	Yes	Yes	No info
Nepal	No	No	No	No	Yes	No
New Zealand	No	Yes		Yes	Yes	No info
Pakistan	No	No	No	No	Yes	Yes
Papua New Guinea	No	No		No	No	No
Philippines	No	No		No	Yes	No
Republic of Korea	No	No	No	No info	No info	No info
Singapore	No	No	No	Yes	Yes	Yes
Sri Lanka	No	No	No	Yes	Yes	Yes
Thailand	No		Yes	Yes	Yes	No
Timor-Leste	No	No	No	No info	No info	No info
Viet Nam	No		No	Yes	Yes	No info

Source: Prepared by <u>www.aidsdatahub.org</u> based on Global AIDS Monitoring Reporting 2021 and UNAIDS and UNDP. (2021). Legal and policy trends. Impacting people living with HIV and key populations in Asia and the Pacific, 2014-2019.

Partially enabling and subject to significant limitations; some aspects of the law or policy are punitive

