

ENVIRONMENT AND SOCIAL COMPLIANCE ASSESSMENT OF THE EAST AFRICAN CRUDE OIL PIPELINE PROJECT



A FIELD MONITORING REPORT

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Cover Illustration: The East Africa Crude Pipeline Route. Source <https://ugbusiness.com/>

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ACRONYMS

ACODE	Advocates Coalition for Development and Environment
BUKITAREPA	Bunyoro Kitara Reparations Association
CAO	Chief Administrative Officer
CFR	Central Forest Reserves
CPF	Central Processing Facility
CSCO	Civil Society Coalition on Oil and Gas in Uganda
CSO	Civil Society Organization
EACOP	East African Crude Oil Pipeline
EHS	Environment Health and Safety
ESIA	Environmental and Social Impact Assessment
ESIS	Environment Social Impact Statement
FGD	Focus Group Discussion
HSE	Health, Safety and Environment
HGAs	Host Governments Agreements
HOCADEO	Hoima Caritas Development Organisation
IFC	International Finance Corporation
IOC	International Oil Company
JVP	Joint Venture Partners
KII	Key Informant Interview
MEMD	Ministry of Energy and Mineral Development
MCPY	Main Camp Pipe Yard
NGOs	Non Governmental Organisations
NFA	National Forestry Authority
PAP	Project Affected Person
PAU	Petroleum Authority of Uganda
PPE	Personal Protective Equipment
RAP	Resettlement Action Plan
ROW	Right of Way

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CHAPTER ONE

INTRODUCTION AND BACKGROUND

1.0 Introduction

The sheer scale of operations of petroleum projects has the potential to pose both environmental and social risks. Pipeline projects may destroy vegetation, harm local wildlife and add to local environmental challenges if not managed well. Pipeline projects may create physical and economic displacements, raise human rights issues associated with poor implementation of cut-off dates, delayed compensations, resettlements and loss of livelihoods. Environmental and social compliance monitoring of such projects is therefore important for early detection of negative social-economic and environmental impacts and putting in place mitigation measures. Overtime, experience has shown that third-party monitoring of petroleum projects provides unbiased opinions about the environment and social impacts. It is in this spirit that the Civil Society Coalition on Oil and Gas (CSCO), undertook a monitoring exercise for the East African Crude Oil Pipeline (EACOP) Project. This report presents the background, purpose of the field monitoring, methodology, key findings, conclusions and recommendations to improve compliance.

1.1 Background

Uganda has commercially viable oil reserves.¹ The exploration and appraisal of the wells estimate a total of 6.5 billion barrels of stock tank oil initially in place (STOIP), with 1.4 billion barrels recoverable. The upstream petroleum sub-sector is now progressing into the development and subsequently production phases of the petroleum value chain.² The anticipated petroleum production in the country has created the need for infrastructure that adds value to the petroleum to be produced. The country has therefore taken significant steps in planning and implementing the development of infrastructure in the petroleum upstream, midstream, and down - stream sub-sectors.

In the upstream, the Tilenga and Kingfisher projects have been

1 <https://www.pau.go.ug/ugandas-petroleum-resources/>

2 <https://www.pau.go.ug/petroleum-exploration-in-uganda/>

designed to process 230,000 barrels per day (with the Tilenga project designed to process 190,000 barrels per day and Kingfisher project to process 40,000 barrels per day respectively). The East African Crude Oil Pipeline (EACOP),³ and the Greenfield Refinery⁴ are some of the key projects in Uganda's midstream petroleum value chain.

The EACOP covers a stretch of 1,443 Kilometers, of which a stretch of 296Km will be located in Uganda, traversing 10 districts from Kabaale industrial park in Hoima district to Mutukula at the Uganda-Tanzania border. The EACOP will require, among other things, land for temporary and permanent structures. The land required will be acquired through implementation of Resettlement Action Plans (RAPs) which specify resettlement arrangements and the measures for avoiding, minimizing or compensating losses or other negative social and environmental impacts resulting from resettlement. EACOP project is required to adhere to the terms and conditions highlighted in the certificate of approval for the Environmental and Social Impact Assessment. All these processes require routine and independent monitoring of the project activities.

It is against this background that the Civil Society Coalition on Oil and Gas in Uganda (CSCO) organized this field monitoring visit. The field visit thus aimed at ascertaining the status of the EACOP project as well as assessing the social and environmental compliance aspects of the project activities. The findings and recommendations will continue to inform not only the design and execution of project activities but also inform the design of corrective measures where gaps have been identified.

3 The EACOP is a 1,445 km, 24-inch diameter heated and buried crude oil pipeline that will start from Kabaale, Hoima district in Uganda, to Chongoleani, Tanga in Tanzania.

4 The Refinery project includes the construction of a 60,000 barrels per day (bpd) capacity refinery in Kabaale, Hoima district, a 211 km long multi-products pipeline and storage facilities for the refinery products.

Figure 1: The East Africa Crude Pipeline Route



Source: <https://ugbusiness.com/>

1.2 Purpose of the field monitoring exercise

Sustainable development of the Oil and Gas Sector calls for strict adherence to and compliance with not only international best industry practices but also national laws and guidelines. Ensuring compliance requires a concerted effort between project developers, regulators, project host communities and third-party monitors. Over the years, CSCO has collaborated with the oil Companies, Petroleum Authority of Uganda (PAU), and the Ministry of Energy and Mineral Development (MEMD) to monitor environmental and social compliance in the Upstream and Midstream oil and gas activities in the Albertine Graben. In many cases⁵, the CSCO structured monitoring exercises have generated recommendations and feedback to government and oil companies that have been used to improve compliance. This has

5 In October 2022, CSCO carried out a field monitoring visit for kingfisher and Tilenga projects and generated a report with recommendations. In June, 2023, CSCO also carried out monitoring for Tilenga and made recommendations.

strengthened regulation, and governance of the oil and gas sector in Uganda. Accordingly, the purpose of this field visit was to monitor the progress of the EACOP project, identify the best practices, the gaps, and provide recommendations for corrective measures.

1.3 Brief description of the EACOP Project

The East African Crude Oil Pipeline Project (EACOP) will transport crude oil produced in Uganda's Lake Albert oil fields to the Port of Tanga in Tanzania as the access port to the world markets. The EACOP will run 1,443km from Kabaale, Hoima district in Uganda to the Chongoleani Peninsula near Tanga Port in Tanzania. The biggest stretch of the pipeline (80%) will be located in Tanzania. It is to be a buried thermally insulated 24-inch pipeline along with six pumping stations (two in Uganda and four in Tanzania) ending at Tanga with a Terminal and Jetty. At Tanga, the crude oil will be loaded onto tankers. The EACOP is currently being constructed in addition to two upstream development projects which are not part of the EACOP development and investment, known as Tilenga and Kingfisher projects respectively. Each development will consist of a Central Processing Facility (CPF) to separate and treat the oil, water and gas produced from the wells. Kingfisher will have four well pads and a CPF with a peak daily capacity of 42000 bbl/d. Tilenga CPF will have 31 well pads and a capacity of 204,000 barrels per day (bbl/d). Tilenga and Kingfisher CPFs will be connected by feeder lines to the starting point of the EACOP at Kabaale. At Kabaale, the oil will be metered and then comingled into a single stream. There is also a proposed Ugandan Refinery Project which is expected to have a right of first call to process 60,000 bbl/d, with the remainder of the oil being exported via the EACOP. The pipeline route via Tanzania was confirmed in April 2016 at a summit with the East African Heads of State. In the period 2016-2018 the EACOP route was studied and narrowed down to its final width of 30 Meters.

The development of EACOP project is guided by cooperation agreements which include: (a) An Inter-Governmental Agreement between the Governments of Uganda and Tanzania setting out common principles and signed on 26th May 2017 (b) Two Host Governments Agreements (HGAs) between the EACOP and the Governments of Uganda and Tanzania, signed on 11th April 2021 and 20th May 2021 respectively. These HGAs cover matters such as Land, HSE standards, fiscal regime, authorizations, decommissioning and recourse to dispute mechanisms.

Source: Extract from EACOP ESIA report

1.4 Scope of the report and objectives

The monitoring exercise assessed the extent to which the EACOP project was complying with the requirements and provisions of relevant national laws in Uganda,⁶ international petroleum best industry practices and standards⁷, and project specific resettlement action plans. The monitoring also assessed the extent to which the EACOP project was

6 National Environment Management Act 2019, Occupational Safety and Health Act 2006, East African Crude Oil Pipeline Act 2021 etc.

7 Guidance from International Finance Corporation's Performance

adhering to the conditions outlined in the Environment and Social Impact assessment certificate. The field monitoring exercise covered key aspects of waste management, health and safety, biodiversity, restoration, compensation, livelihoods enhancement, and community protection.

The monitoring exercise was rapid in nature and covered selected sites where activities and installations are planned to be done. The monitoring visit was organized in partnership with EACOP. It took place between 14th - 17th July 2023 covering the districts of Hoima, Kikuube, Kakumiro, Kyankwanzi, Gomba, Mubende, Lwengo, Ssembabule, Rakai and Kyotera. During the exercise, CSCO monitoring team was able to observe and appreciate the developments on the project sites. The team took note of concerns in relation to the requirements of the laws, policies and plans, and participated in the CSCO reflection meeting that synthesized the observations into a CSCO report.⁸

During the monitoring exercise, the members of the team carried out the following activities:

- i. Held guided visits and walkthrough tours in selected sites.
- ii. Took photographs that provide evidence of what is taking place and drawing conclusions.
- iii. Held discussions with the EACOP and TotalEnergies personnel, PAU, and selected PAPs community members.
- iv. Observed and took note of thematic issues identified at project sites.
- v. Participated in daily briefing and wrap up meetings.

The monitoring exercise was aimed at achieving the following objectives:

- i. Assessing how the East African Crude Oil Pipeline project is complying with ESIA conditions and management plans in respect to environmental, health and safety, biodiversity, social and human rights considerations.
- ii. Identifying and documenting best practices and areas of improvement on every site visited, with respect to the manner in which plans and strategies are being implemented.

Standards, the World Bank Group's policy on Involuntary Resettlement, and Equator Principles and standards guiding the implementation of large-scale infrastructure projects in the petroleum industry.

- 8 Specific monitoring tools/checklists were prepared to guide the observations, comments, and interviews.

- iii. Developing evidence-based recommendations for effective implementation of the EACOP project as well as advancing mechanisms of addressing the existing concerns.

1.5 Methodology

The monitoring visit was organized in partnership with EACOP team. The specific monitoring tools/checklists were prepared to guide the observations and interviews. Participatory tools were developed to facilitate the monitoring. These tools were informed by the provisions of the already existing environmental and social management frameworks such as the relevant laws, guidelines, standards, Environment and Social Impact Assessments (ESIAs), and international oil and gas best Industry practices. The monitoring activity consisted of three distinct stages: (i) Pre-field activities; (ii) Field/on-site activities; and (iii) Post-field activities.

1.5.1 Pre-field activities

This involved review of documents including the EACOP ESIA report, the EACOP certificate of approval, the project ESMPs, RAP reports, as well as national legislative frameworks and international standards related to the oil and gas infrastructure development. Review of the EACOP ESIA report aided the monitoring team in acquainting itself with: (a) the baseline conditions of the EACOP project; (b) the commitments, mitigation actions, and monitoring indicators made prior to installation and construction of the facilities in the EACOP project area; and (c) the existential social-economic and cultural issues within the project's areas of operation. The monitoring team reviewed various relevant documents to form a basis for designing the appropriate field monitoring tools including checklists to assess compliance of the projects with national and international standards, safeguard policies, and best industry practices.

1.5.2 Field visit activities

EACOP shared a field visit plan and the sites to be visited prior to the visit. These were then discussed and agreed between the EACOP and the CSCO monitoring team. This was important as it aided in harmonizing the activities and ensuring that the exercise does not impede other on-going activities and operations at sites. On-site field visit involved site orientation and debriefing, question and answer sessions with the site managers, documentation and recording of the observed evidence.

1.5.2.1 Sites Visited

(i) Pipeline crossing at Wambabya Forest Reserve

Wambabya Central Forest Reserve is located in both Hoima District and Kikuube districts in Western Uganda. It is situated near the north-eastern border of Bugoma Central Forest and covers an area of 3,429 ha (13.24 sq mi). It was demarcated in 1932 and is governed by the National Forest Authority (NFA). It is one of the areas of ecological importance traversed by the EACOP route. According to the EACOP team, the pipeline is designed to pass on the edge of the forest reserve, about 240m from the forest edge. It was also observed that the CFR land has been planted with Eucalyptus trees in replacement of the indigenous species that have been degraded. The EACOP-affected section is a movement corridor for chimpanzees⁹ and the activities of the EACOP development are likely to have a negative effect on the movement, survival and behavior of chimpanzees.

(ii) Mr. Erineo Byaruhanga's Home

Mr. Byaruhanga is case of a project-affected person who did not consent to have his land acquired. His home is situated in Kiziranfumbi sub county-Kikuube district. The EACOP route passes through his land although he has rejected compensation.

(iii) Pipeline crossing at Taala Plantation Forest Reserve, Kyankwanzi district

The EACOP will traverse through Taala Forest Reserve (cross section of about 4km of the forest). Taala forest was a designated as a central forest reserve in 1968. It is reported to cover an area of 88.02km. This forest reserve hosts a variety of species such as butterflies, moths, mammals, moist savanna and forest mosaic vegetation plus a wide range of birds.

(iv) The agricultural livelihoods enhancement demonstration gardens

The team visited two Agricultural Demonstration Gardens. These were - (1) The livelihoods demonstration garden in Kasambya village, Katikara Sub County in Kakumiro district and (2) the demonstration Garden in Kijumba Village, Kabale Sub County Hoima District. The two demonstration sites are run by Montrose Africa and Hoima Caritas Development Organization (HOCADAO). The demonstration Gardens have maize, beans, and vegetables. The garden in Kisambya Kakumiro serves 13 directly affected PAPs of the Main Camp Yard (MCPY) 1. The demonstration gardens are designed as livelihoods enhancement initiatives for acquisition and transfer of agro-skills.

(v) Pump station and helipad in Sembabule district

The CSCO team visited the pump station and the helipad located in

9 IIED (2022); Creating Corridors for Chimpanzee Conservation.

Njaza, Mawogola sub-county in Sembabule district. The station will work as pumping station for regulation of flow of crude oil on transit to Tanga port. This site affected 10 households; three of which opted for houses, two were resettled adjacent to the site, while the other ones settled in Sembabule town. The land acquired at this site is 18 acres for both pump station and helipad, which will work as an emergency landing point for the pump station.

Figure 2. CSCO Monitoring Team at helipad and pump station 2 in Sembabule, District



(Vi) The pump station 2 in Sembabule district

This is a 40-acre piece of land acquired for staff settlement during the construction phase. It will also house offices during and after pipeline construction.

(viii) Kabajjo Memorial Junior School

This is a Primary school that the EACOP project was building to replace the old Nursery school which was affected by the project. It is a privately-owned school in Sembabule District, which serves the whole community.

1.5.3 Post field visit activities

The post field monitoring activities involved further analysis and interpretation of data. The monitoring team checked and verified all

responses and notes/records from KIIs and FGDs. Data processing involved content analysis of information gathered from secondary data sources and interpretation of qualitative data from KIIs and FGD transcripts, which included coding, summarizing, categorizing, direct quoting and comparison as much as applicable. The provisions of Uganda's legal and policy framework for Environment and social management, IFC standards, the Equator Principles and Equal Opportunities provisions on gender inclusion in project implementation were considered in the analysis and used to bench mark the findings and draw conclusions.

1.5.4 Report review meeting

A review meeting was organized on 27th September, to provide an opportunity for members to discuss the draft report. During the meeting, the draft report was discussed and some gaps were identified. It was then agreed that a follow up field visit be organized to collect more information from other important sites that had not been covered in the first visit. The reason for the follow up visit was to carry out independent verification of the information collected most of which had been provided by EACOP Team.

1.5.5 Follow up visit and feedback meeting with EACOP team

The follow-up visit took 5 days, from 1st to 5th October 2023. It was conducted in four districts namely, Kyotera, Lwengo, Hoima and Kikuube. The team collected additional information to fill the gaps identified in the draft report.

A feedback meeting was organized between the EACOP and CSCO monitoring team. The objective of this meeting was to provide an opportunity for EACOP to provide clarifications and obtain feedback on some of the issues raised in the draft report. The meeting was organized on 6th October 2023.

1.5.7 Limitations

This exercise was mainly based on field observation, desk review of documents, debrief meetings with the EACOP staff, meetings with Local Government officials, Project Affected Persons (PAPs), and Contractors' teams. However, some of these methods could not readily avail some key information such as baseline statistics on resources like Wambabya forest and Tala Forest Reserve.

The available time was also not sufficient for detailed investigation and inquiry. Some issues required deeper engagement and triangulation of claims across different stakeholders to arrive at the actual situation.

CHAPTER TWO

OVERVIEW OF APPLICABLE NATIONAL LAWS, REGIONAL AND INTERNATIONAL STANDARDS FOR OIL AND GAS INFRASTRUCTURE PROJECTS

2.1 National Policies and Laws

Development projects throughout the country are enjoined to follow the policies and laws of Uganda. Since these projects require land, the acquisition of this land must be done in a way that respects other land uses and human rights. This requires companies engaged in settlement and resettlement of persons for development projects, to put in place measures that not only comply with national policies and ensure the respect of national laws, but also international standards. Land rights are protected by the national constitution of Uganda and a number of policies have been put in place with strict guidance on matters to do with land dealings. These include: the National Land Policy 2013, the National Oil and Gas Policy 2008, the Land Acquisition and Resettlement Framework 2016, and the National Environment Management Policy among others.

The Constitution of Uganda provides for land ownership and the right to own property. Article 237(1) and (3) states that land in Uganda belongs to the citizens of Uganda and shall be vested in them in accordance with the four recognized systems of tenure, i.e., customary, freehold, mailo and leasehold. The land tenure systems gives citizens different rights and these are generally important when it comes to acquisition of land for large scale infrastructure projects such as the EACOP. These rights must be considered in the plans and general compensation or resettlement of affected persons.

The Constitution also notes that non-citizens can own land leases. This means private companies which engaged in development projects can only acquire leases from citizens or from government where

government owns or acquires the land.

The right to own land and property on land is further protected by Article 26 of the constitution, which provides that a person has a right to own property and this right cannot be taken away except where:

- (a) The taking of possession or acquisition is necessary for public use or in the interest of defense, public safety, public order, public morality, or public health; and
- (b) The compulsory taking of possession or acquisition of property is made under a law which makes provision for—
 - (i) Prompt payment of fair and adequate compensation, prior to the taking of possession or acquisition of the property; and
 - (ii) A right of access to a court of law by any person who has an interest or right over the property.

It is this provision that sets the standards of compulsory acquisition of land and guides such other decisions.

The Land Acquisition Act, spells out aspects of displacement and resettlement of individuals. There are also several laws that need to be considered in the protection of human and property rights. These include: The Land Act; The Local Government Act; The Physical Planning Act; Town and Country Planning Act; and the Petroleum (Exploration, Development and Production) Act and the Constitution (Land Evictions) (Practice) Directions, 2021. These laws provide for various provisions in relation to land acquisition, evictions and settlement that must be followed.

The process of land acquisition is governed by the Land Acquisition Act. The Land Act provides that government or a local government may acquire land in accordance with the Constitution.¹⁰ It does not elaborate on the process. It is the Land Acquisition Act¹¹ that provides for the processes of acquisition of land. Both the Land Act and the Land Acquisition Act do not define compulsory acquisition of land. However, from the provisions of the Land Act¹², government and the local government are the only entities that can compulsorily acquire land.

10 S. 42 of Land Act cap 227

11 Cap 226

12 S. 42

This position is articulated in the Land Act which provides that:

Where it is necessary to execute public works on any land, an authorized undertaker shall enter into mutual agreement with the occupier or owner of the land in accordance with this Act; and where no agreement is reached, the Minister may, compulsorily acquire land in accordance with Section 42.¹³

From this section, a private person can only take land through an agreement with the landowner, and where this is not possible, government through the minister can compulsorily acquire the land. The same can be said of the Petroleum (Exploration, Development and Production) Act¹⁴ which requires petroleum companies to get leases from citizens and where that is not possible, the Minister can acquire the land.

Several issues normally arise from the value of land and other things on land as well as social issues. Uganda's laws generally provide for compensation for things on land such as crops, houses etc. The value of crops and temporary structures is determined by the District Land Boards, and this value is determined according to the prevailing market rate.¹⁵ However, the challenge has been the difference between the time from when the value is determined and when the money is actually paid. For example, where there are months between when the value of a crop was determined and when compensation is paid, the crop will ordinarily have gained value beyond what was allocated to it. This is often an area of concern for project affected persons. Projects such as EACOP did not address this challenge by either reducing the time between valuation and actual payment or by catering for the increase in value over time.

Intangible items are generally termed as disturbance allowance under Ugandan law. The Land Act provides for disturbance allowance of 30% of compensation amount if quit notice is given within 6 months and 15% of compensation amount if quit notice is given after 6 months.¹⁶ This is paid on top of the value of the land. The challenge has been whether the RAP considered social dynamics like living together, social cohesion, religious issues etc. and how these can be compensated. There is still a gap on determining the value for such considerations.

13 S. 73(1) of the Land Act

14 S. 138 Petroleum (Exploration, Development and Production) Act, 2013, Act No. 3 2013

15 S. 76 and 77(1) of the Land Act

16 S. 77 of Land Act

Similarly, the Petroleum Exploration Act¹⁷ requires the developer to get leases from citizens, and also mandates the developer to not only pay adequate compensation for properties on land but also pay for disturbance.¹⁸ However, this law does not go further to set parameters which can be used to arrive at the value of social aspects of the disturbance.

2.2 Regional and International Standards

International human rights law¹⁹ gives the state the obligation to protect, respect and uphold human rights. This principle is also enshrined in Uganda's Constitution that provides that the rights and freedoms of the individual and groups enshrined in the constitution shall be respected, upheld, and promoted by all organs and agencies of Government and by all persons.²⁰ In Uganda, the state has a bigger duty to put in place systems to ensure that companies and all private actors respect and uphold human rights even when conducting development projects such as the oil pipeline project.

In international law, the obligations of the state in evictions and other human rights can be categorized into three obligations i.e. the obligation to respect, obligation to protect, obligation to fulfill the rights.²¹ The obligation to respect requires the state or state agents to refrain from violating human rights or the enjoyment of rights. This requires the state or its agents to act in such a way that will not violate rights.

The obligation to protect requires the state to put in place measures that ensure that rights are not violated. The measures can include laws and policies that protect citizens and all persons living within the jurisdiction of the state. The last obligation is for the state to put in place measures to ensure that those whose rights are violated get redress. Redress includes accessing courts or tribunals to address the violations in a quick manner.

The above obligations are important for Uganda when it comes to forced evictions. All forms of forced evictions need to have mechanisms to ensure that rights are not violated and where the rights are violated the victims are able to access redress mechanisms and the redress must be timely and satisfactory or realistic.

17 Petroleum (Exploration, Development and Production) Act, 2013, Act No. 3 2013

18 S. 139 ibid

19 Universal Declaration of Human Rights 1948

20 Article 20(2) of the Constitution of the republic of Uganda, 1995

21 International Covenant on Economic, Social and Cultural Rights

The UN Special Rapporteur on adequate housing developed basic guidelines on development-based evictions and displacement and these set out the basic principles that state and private actors need to follow while conducting evictions.²² The guidelines set out basic obligations for the state as follows:

- a) States shall ensure that evictions only occur in exceptional circumstances. In order to avoid violation of rights, evictions should be avoided and occur only where there are no other options.
- b) States must adopt legislative and policy measures prohibiting the execution of evictions that are not in conformity with their international human rights obligations.
- c) States shall take steps to ensure the protection of individuals, groups and communities from evictions that are not in conformity with existing international human rights standards.
- d) States should carry out comprehensive reviews of relevant national legislation and policy with a view to ensuring their conformity with international human rights provisions.
- e) States should ensure and promote non-discrimination for all groups involved or affected by eviction. Special attention needs to be taken for minority groups.
- f) States are required to have laws that give persons living in their jurisdiction legal tenure to land and other properties to ensure these are protected and can be compensated by law.
- g) States should ensure human rights standards are integrated in their international relations, including through trade and investment, development assistance and participation in multilateral forums and organizations.

The World Bank IFC Performance Standards on Environmental and Social Sustainability, 2012 stresses that the assessment process of land and property of affected groups and individuals should address compliance with relevant host country laws, regulations and permits that pertain to social and environmental matters.

Under Performance Standard 5, the IFC recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. The IFC recommends

22 Annex 1 of the report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living A/HRC/4/18 available at https://www.ohchr.org/Documents/Issues/Housing/Guidelines_en.pdf

avoidance of involuntary resettlement and where it is unavoidable; steps should be taken to avoid having negative effects on the communities that are resettled. RAPs should be part of the development plans. The IFC performance standards further provides that:

- a) Forced eviction should be avoided and where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by providing compensation for loss of assets at replacement cost and ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- b) Where there is forced eviction, projects should improve, or restore, the livelihoods and standards of living of displaced persons.
- c) Need to improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.
- d) Necessity to promote community engagement including host community through consultations.
- e) Need to provide grievance handling mechanisms and these need to be accessible to all. Accessibility means even for minority groups that may not have easy access to court, RAPs should provide for means through which such groups can air their grievances and be heard.
- f) Need for consideration should be made for physical, social and economic displacement. Compensation should consider the physical properties lost, economic loss, social factors as well as costs of resettlement for persons affected.

However, while Uganda has made progress in domesticating and following these guidelines, there are still some gaps. The government of Uganda is required to strengthen the relevant laws and improve on enforcement to ensure that land- based developments comply with these laws.

CHAPTER THREE

PRESENTATION OF FINDINGS

3.1 Introduction

The section below presents key observations of the monitoring team as they relate to environmental, social and livelihood concerns. The section summarizes key findings and site-specific observations that demonstrate good practices, identifies gaps and areas of improvement, and outlines proposals for corrective action.

3.2 Good practices observed

3.2.1 Soil and Biodiversity

a) *Minimization of impact by avoidance*

According to the interactions held with the EACOP team, there were considerable efforts made to avoid significant impact on most of the biological and cultural resources. The routing of the pipeline considered and avoided a number of wetlands, forests and other resources. For example, the EACOP team avoided the most sensitive part of Taala Forest Reserve, which is a good step towards complying with the environmental safeguards.

The monitoring team also carried out a site visit to Kituntu Mosque where the project avoided a mosque and an old indigenous tree. The site is located in Kituntu village, Nabigasa Sub County, Kyotera district. The monitoring team learnt that the EACOP team avoided destroying the ancient indigenous tree due to its historic value. The tree is scientifically known as *Ficus bengalensis* (locally known in Luganda language as *Mutuntu*). At the same spot is found a Mosque that was initially in the right of way of the pipeline. The EACOP team revealed that after considering the cultural value of the tree, as well as the religious value of the Mosque, the project took a decision to re- route the pipeline and dodge these key features to safeguard the heritage.

b) *Restoration of degraded forests and vegetation*

The EACOP team revealed that, they were entering into partnerships with other key stakeholders such as NGOs to restore and conserve the forests around the pipeline route and also restore vegetation around

the PAPs houses. For example, the team was able to notice some effort exerted to restore the vegetation or provide an offset especially around the PAPs houses. The monitoring team observed newly planted grass in the compounds of the PAPs houses, which is a good practice. During the feedback engagement meeting with EACOP team, held at Sheraton hotel on 6th October 2023, the project reiterated its commitment to conservation of forest reserves, restoration of vegetation around project sites along the pipeline route, and pledged to work with National Forest Authority to achieve this.

Figure 3. PAPs houses with grass planted in the compound



3.2.2 Socio-Economic and Cultural issues

(a) Transitional support and Livelihood restoration

This is a good initiative that aims at boosting the agricultural yields of PAPs supported by the EACOP. This involves food baskets (transitional support), project displaced persons relocation support, agriculture (priority area pilot) vocational training and skills development and sustainable water solutions. The monitoring team learnt that two companies were contracted to support livelihood restoration. These were Eco & Partners Uganda and Living Earth Uganda. The contractors were required to extend relocation support to a total of 177 Project Displaced Persons. The PAPs were supported with agricultural inputs, including farm tools and seeds. The project also established 6 demonstration plots of one acre each for training purposes. The contractors introduced varieties of crops, such as maize, beans and vegetables. The PAPs were also trained in agronomic best practices to maximize production. The farmers benefited from the onsite support in a number of demonstration farms set up by the EACOP project. It's a good practice to have farmers acquire farming and agricultural extension knowledge which will in turn enhance production. It was also reported that the project has been providing relief support to help the project affected people.

(b) Stakeholder Engagement

The team visited two selected district local governments of Mubende and Hoima. The team had engagement meetings with selected officials such as the Deputy Chief Administrative Officer (CAO) in Hoima and the Principal Assistant Secretary (PAS). The meeting was held in the office of the CAO. In Mubende District, the team engaged with the CAO and Senior Environment Officer at the district council hall. The interaction covered key aspects of participation in oil and gas activities, local content and experiences of the district local government on the project. Evidence from these meetings noted that the two districts were at different levels of engagement.

In Mubende, the district officials were appreciative of the support and good relations with the EACOP team as stated by the Chief Administrative Officer:

"We are working with the EACOP team harmoniously and they are supportive to the district work. I have a full department that work in liaison with EACOP to deliver support to the district and to harmonize community engagement in the different parts of the district".

It is also noteworthy that the EACOP ESIA points out a number of habitats in Mubende that require close attention. However, these were not monitored during the visit because of the pre-determined agenda by the host. The district officials did not sound confident about the state of some of the wetlands and indigenous trees of ecological interest.

Evidence from Kitenga, sub-county, Mubende district revealed that, the EACOP has engaged the community. They noted that the project had come up with a number of opportunities such as jobs, trainings and skills development for community members. On the whole, their opinions were that the pipeline and its associated processes had been of benefit to the local people – especially from the angle of compensation and livelihoods support to PAPs. These officials praised the EACOP project for the work well done and pledged continued support and Involvements.

(c) Compensation and resettlement

The team noted that giving the PAPs options to choose from was a good practice. The houses built for those who opted for resettlement were of good quality. The designs of the Project Affected Person's (PAP) resettlement houses were compliant with requirements under section 7.1.5 of the National Physical Planning Standards and Guidelines (2011), which stipulates that the building designs must consider the needs of the disabled, particularly those with mobility handicap.

The team interacted with the beneficiaries as well. They expressed appreciation of the houses and the livelihoods support extended to them by the EACOP team. Mr. Kabanda John Bosco and Sulaiman Kizito, were some of the PAPs who expressed that they were happy about their new life in EACOP constructed houses.

Figure 4. One of the new resettlement houses built by the EACOP in Kyotera



Figure 5. A house with a ramp to facilitate easy access for the physically challenges



Figure 6. Mr. Kabanda's old house, in which he lived before being resettled by EACOP.



3.2.3 Waste Management, Environment, Health

(a) Compliance with Sanitation and Hygiene Requirements

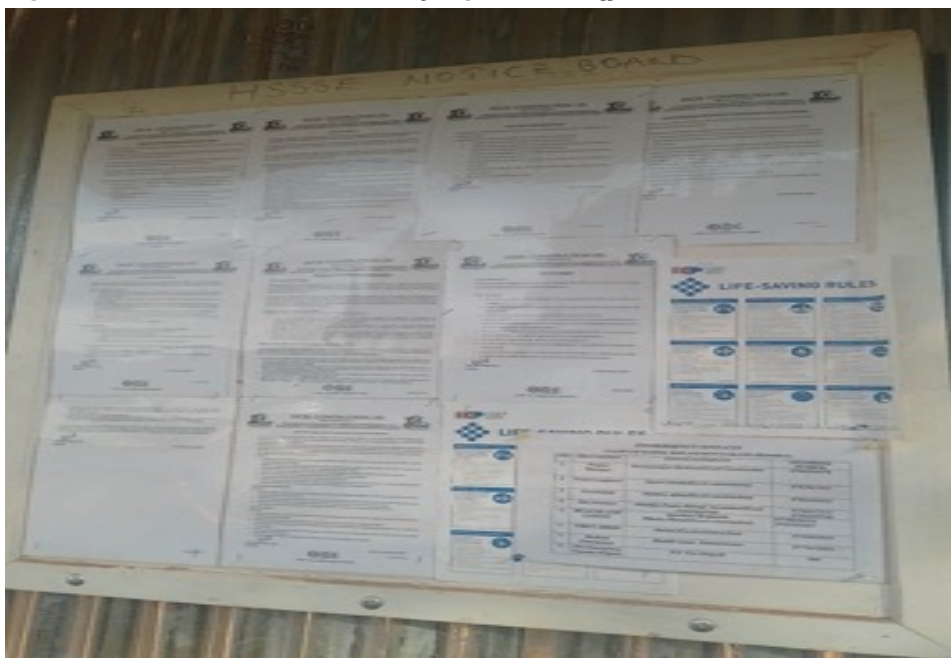
The ESIA report for EACOP project proposes a number of measures for ensuring sanitation, hygiene and health of workers. This is also a requirement by the Occupational Safety and Health Act, 2006. By the time of the field visit, most sites such as Pipeline crossing at Wambabya Forest Reserve, pipeline crossing at Taala Plantation Forest Reserve, pump station and helipad in Sembabule district, and the camp station in Sembabule district did not have any construction activities, that would trigger the need for health, and sanitation activities. The assessment on health and sanitation was thus restricted to the a few sites such as; the agricultural livelihoods enhancement demonstration gardens and Kabojja Primary school.

The monitoring team established that there were provisions for waste separation at Kabajjo Memorial Junior School which was the only active construction sites within the EACOP project area. This good practice is commendable and is in line with the IFC General EHS Guidelines for handling waste at construction facilities (2007), which- states that non-hazardous waste, such as paper, cardboard, glass, aluminum, and plastic, should be collected separately and recycled. The team also found out that the biodegradable solid waste is being composited for the generation of compost manure.

(b) Adequate Safety signage and labelling at the construction site

The construction site at Kabajjo Memorial Junior School was well labeled with safety marks such as the “No smoking signs”, “Slow Down Speed Limits,” and the ‘Life saving rules “signs” among others. There was a specific notice board for Health and safety, where information is displayed.

Figure 7. A notice board with safety signs at Kabajjo Memorial Junior School



(c) Emergency Preparedness and Response

The aspects of emergency response and preparedness were only assessed at Kabajjo Memorial Junior School, which was the only active construction site at the time of the monitoring exercise. The construction site had reasonable emergency response facilities. These included, fire-extinguishers, first aid boxes, and emergency assembly points placed in visible and accessible areas. This practice aligns with the IFC World Bank (2007) General Guidelines, which mandates facility operators to establish public emergency response programs and ensure that safety equipment are readily available, visible and accessible at the facility.

Figure 8. An example of a fire Extinguisher installed at Kabajjo Memorial Junior School



(d) Waste Disposal Facilities

The monitoring team found placement of waste disposal facilities a good practice that enhances good sanitation. At the site, the team also observed good environmental practices such as waste collection/separation bins and use of personal protective gear during construction.

Figure 9: Picture showing color coded bin for waste segregation at Kabajjo Memorial Junior School



3.3 Gaps and weaknesses

During the monitoring exercise, the team identified some gaps and weak areas that should be strengthened. The issues of concern have been categorized under the following thematic areas; (a) soil and biodiversity (b) Waste management, environment and health (c) socio-economic and cultural issues.

3.3.1 Soil and Biodiversity issues

(a) Degradation of ecosystems

The pipeline route passes through a number of ecosystems and ecologically sensitive areas. The Environment and social impact statement of EACOP, highlights several conditions for protection of rivers, wetland and forests. Section 3.0 provides for specific conditions. Under section 3 (1), the project is expected to restrict the vegetation clearance and pipeline construction to the right of way (ROW) of 30M unless otherwise permitted. Section 3 (2) requires the project to put in place measures to prevent interference with existing drainage patterns and the natural hydrological functioning of wetlands, streams, rivers, and or ground water. The team visited some sections of Wambabya and Taala forests. At the time of the monitoring exercise, the development activities such as land clearing, trenching and laying the pipes, among others had not yet started, thus making judgment over the potential extent of damage quite premature.

The team however observed that in both forests, the project-affected area is highly degraded and indigenous species had largely been replaced with eucalyptus species. Although the degradation cannot be attributed EACOP, construction of the pipeline will open up the area to human activities hence further degradation. It is important therefore, that the EACOP project works with NFA to develop and present plans for the restoration of the biodiversity value of these areas, in compliance with the provisions listed under section 3.3.3 (iii) of the ESIA certificate, which requires EACOP to liaise with NFA to develop and implement programs to compensate for lost forest cover with in the project corridor of Taala forests. Section 3.3.3 (v) also requires the EACOP project to liaise with NFA to secure opened up areas and prevent illegal access in and around the pipeline corridor.

It was also noticeable that the EACOP team had not supported any initiatives for the restoration of the natural forest estate to illustrate commitment to compliance with the environmental or biodiversity enhancement requirements for no-net loss. Deeper engagements with the EACOP and the NFA should be pursued to establish the plans for

this area as expected to be provided for in the biodiversity action plan.

3.3.2 Waste Management, Environment, Health

(a) Adequate waste disposal facilities

It was also observed that in some instances, although separate color-coded containers were provided, the waste in these containers was still mixed. However, while a number of policies were displayed for public consumption and sign posts put in place, these were all in English. The monitoring team observed that this limited understanding and use of the information displayed to only those that could read and understand English.

Figure 10. Mixed Waste in a waste bin at Kabajjo Memorial Junior School



The monitoring team also, noted that there were inadequate facilities for waste management at the demonstration gardens. Waste bins were not provided on the two sites, and at the time, visitors were frequenting the place – in addition to the trainers and trainees. On the site in Kasambya Village, plastic bottles could be seen dumped around the site carelessly.

Figure 11: Plastic bottles carelessly dumped at a demonstration garden in Kasambya Village



On both sites, there were neither pit latrines, nor toilets seen. The attendants of the site in Kijumba revealed that they were using the Toilets belonging to the church, although this was located at far distance, while in Kasambya village; the attendants revealed that they were using the toilets of the PAP. This contravenes the conditions provided for under section 4.9 (iii) of the EACOP ESIA certificate which requires a developer to put in place appropriate and adequate sanitary facilities that are suitable for different gender at work sites in accordance with Public Health Act Cap 281.

Another key environmental concern observed was the absence of containers for different waste categories at the houses constructed by the EACOP. This is in contravention of Section 6 (1) of the National Environment (Waste Management) Regulations, 2020. There were signs of littering in one of the PAP's houses. For both houses visited, there were no Waste containers provided, implying that the waste generated was dumped indiscriminately. The monitoring team also noted that there were no sanitary facilities such as the hand basins, soap, and spirits at the houses as required by the Public Health Act Cap 281. The EACOP team pledged to engage the contractor to provide more support to the house holds by raising awareness to the PAPs.

Figure 12: Plastic Waste dumped at the PAPs House



(b) Use of adequate Personal Protective Equipment (PPE)

The monitoring team found out that casual workers were disregarding the use of personal protective equipment. For example, at the time of the visit, the workers at Kijumba demonstration plot were found handling pesticides without Personal Protective Equipment. This contravenes the provisions of Section 4.1 (viii) of the ESIA certificate, which requires the project to accord all employees including casual project workers clear terms and conditions of employment, decent working conditions, and appropriate Personal Protective Equipment (PPE). The casual workers were also found to be cooking lunch in the open with bottles of pesticides placed near the cooking place. This is a high risk as some pesticides may be highly flammable. It also poses a risk of contaminating the food with these pesticides. It was also observed that the workers who had just completed application of the pesticides did not have any other protective gear apart from the coveralls and gumboots. Application of pesticides requires hand gloves and protection for the face by using Masks, and Goggles. During the feedback engagement meeting, the EACOP team took note of the observations and pledged to follow up with the site contractors

HOCADEO and Montrose to address the issues.

Figure 13: Casual Workers with Pesticides at Kijumba Demonstration Garden. None of them has hand gloves.



(c) Utilization of Energy saving stoves

Another key issue of concern was the utilization of the energy saving stoves in the PAPs houses. The team observed that, the PAPs houses were installed with modern energy saving stoves. In some households however, these stoves were not being used and the PAPs were still using the traditional 3 stones for cooking. More sanitization was found to be required for the PAPs to adopt the use of improved cooking stoves to energy saving and reduce smoke which is a health hazard.

Figure 14: An Energy saving stove at one of the PAPs House Hold in Kyotera



(d) Access to clean and safe water

Section 4.9 (ii) of the EACOP ESIA certificate requires a developer to provide safe drinking water for the site workers, in accordance with the public health Act Cap 281. Evidence from the two demonstration sites visited revealed that both sites did not have a water source. The situation was however worse in Kijumba site where the contractor was using a community water source without even contributing to the cost of maintenance. Already, there were complaints from the community about the contractor using the community bore hole as source of water for irrigating the garden, yet there was no contribution made to its repair when it would break down. It was also discovered that the contractor at this site was not providing lunch to the workers.

Figure 15. The community Water source in Kijumba Village being used as a source of water for irrigation for the EACOP project initiatives



3.3.3 Socio-Economic and Cultural issues

(a) Stakeholder engagement, information and awareness raising

Although the project demonstrated some effort to engage key stakeholders, in some cases these engagements had not been adequate. For example, during the engagement, the District leaders of Hoima revealed that, the district had not been fully engaged. The CAO noted that EACOP project was not well appreciated and there had been no deliberate effort to engage the district. The CAO noted that it was hard to recall the last time that district leadership engaged with the EACOP team. The district leadership also observed that they had not been involved in any activities related to EACOP including the

livelihood interventions in Kijumba. The leadership in Hoima called for an urgent need for EACOP team to engage both the district technical and political leadership.

At lower local government level, the monitoring exercise visited three Lower Local Governments. These included;- Lwengo Town Council in Lwengo district, Kitenga sub-county in Mubende district, and Kasasa Sub-county in Kyotera District. The team had an interaction with the mayor and chairpersons local council 1. In Kasasa Sub-county, the team held a meeting with the Community Development Officer, the Chairperson LC111 and the Sub-county Chief. Unlike Kitenga in Mubende, this engagement revealed limited involvement EACOP interventions in their areas of jurisdiction. For example, they noted that the Lower Local Government officials were not aware of how the grievance handling mechanism was working. There were no records regarding grievance redress mechanisms kept at the sub-county level, thus making it hard to trace the cases registered and status of resolution of those cases. The sub-county leadership was not involved in programs such as distribution of relief items for the PAPs and subcounty officials were not even aware of the schedule.

At Kasasa sub-county, the officials had limited awareness of the land acquisition process. The engagement noted limited engagement between EACOP team sub-county officials. It was revealed that after compensation processes, there had been limited interaction between the district and other stakeholders and the Sub-county team had been cut off from any updates around the EACOP project. It was observed that the EACOP team had last engaged the Sub-county in April, 2022. This casts a shadow of doubt on their ability to demand for their rights and entitlements with limited knowledge of the applicable law and procedures.

Figure 16. Meeting with Kasasa Sub County leaders



In Lwengo Town Council, a focus group discussion was held comprising of a number of government officials, including; - The mayor, the Community development officer, and several staff. This focus group discussion was also attended by the District Natural Resources Officer. In this meeting, it was revealed that some of the grievances emerging as a result of EACOP project were at times exaggerated. For example, in the areas affected by EACOP project, three project affected persons had grievances emanating from their internal family disagreements not project induced which at times were wrongly attributed to the project. These grievances were registered in Ndagwe - stones, Kinvunikidde and Kyabagonya villages. It was observed that the awareness and engagement of EACOP with this Town council and Lwengo district was high compared to other districts in Greater Masaka. The team learnt from the meeting with Lwengo District Local government officials that Lwengo was among the EACOP host districts that had an EACOP liaison officer or contact person at the district. This factor could have contributed to limited grievances in the area.

Figure 17: A focus Group Discussion at Lwengo Town Council office



(b) Compensation and Resettlement issues

Although the EACOP project had achieved substantial progress in compensation and relocation of the PAPs, the monitoring team observed that some PAPs had not been compensated. Some of these rejected the compensation rates while others refused to surrender their land to the project. For example, the team visited Mr. Eriheno Byaruhanga one of the PAPs who refused to accept compensation and relocate. Mr. Byaruhanga, revealed that he was a member of Bunyoro Kitara Reparations Association (BUKITAREPA) a pressure group formed for purposes of fighting for human and property rights protection in Bunyoro region. His land had never been surveyed and he did not want to do so until court decides so. In his own words during the interaction with the monitoring team, Mr. Byaruhanga said:

“There is no private owner of Bunyoro land. All the compensation that has been going on since oil was discovered was done to wrong people. I will not allow the pipeline to cross this land.”

He filed a case in court seeking declaration on the rightful owner of Bunyoro kingdom land. Matters escalated up to Africa Union court in Gambia where he awaits judgement. The EACOP project team however emphasized that, they will explore all the available means to ensure that Mr. Byaruhanga’s land is acquired lawfully in line with the existing land acquisition frameworks, adding that it was within the interest of EACOP project to avoid conflicts.

It was further noted that the PAPs had not received any feedback regarding the orphaned (residual) land. It was also reported that the EACOP compensation process did not consider changes especially where land was assessed in 2018 and compensation was done in 2023. This meant that PAPs would inevitably find it hard to buy land with the same amount received.

(c) Creation of un-equal social classes with the resettlement programme

Another key issue of concern observed by the team was the creation of social classes. The resettlement program had elevated the PAPs to a higher status compared the rest of the citizens. The construction of houses and extension of agricultural productivity support to PAPs elevated them to a higher social class and in a way cut them off the normal social set up. In Kyotera, the EACOP was seen as benefactor for new house owners as opposed to a project with good intentions for community transformation. The communities had since started looking at resettlement as a benefit, especially in areas where there were no community-level EACOP project supported initiatives.

(d) Livelihood improvement options

Although the demonstration gardens were set up to provide farmer support, these gardens lacked a whole-community outlook that would assist all interested farmers to cause transformation in the community. These demonstration gardens majorly supported the PAPs and did not benefit the rest of the community members. The market linkages were also not clear. In Kijumba village – Hoima district, the demonstration garden, was also not effectively utilized by the project-affected persons. It was reported that no PAP had received seedlings for planting despite the heavy rains, which usually end in December.

Figure 18. Focus Group discussion in Kijumba, Hoima District



CHAPTER FOUR

CONCLUSION AND RECOMMENDATIONS

4.1. Conclusion

Generally, there was some laxity in supervision of the sub-contractors which has led to lapses in compliance with set standards by national laws, ESIA mitigation measures and best practices in project implementation. While, the project has carried out several engagements with stakeholders; there is still need to do more and to collaborate further with relevant local governments, relevant government ministries and environmental and natural resource agencies to ensure successful implementation of the project and minimize negative social and environment impacts of the project.

As the oil and gas sector continues to the development phase, third party monitoring becomes more crucial than ever before. Implementing the mitigation measures outlined in the Environmental and Social Impact Statement (ESIS) for the EACOP project and the conditions of Certificate of Approval can only be achieved with continued monitoring by stakeholders. Participatory monitoring creates a window for constructive feed feedback and corrective action, thus strengthening the governance of the sector.

4.2. Recommendations

Following the field visit and the observations made, the monitoring team made a number of recommendations that could aid an improvement in compliance with the various local and international frameworks and standards. In broad categories, the recommendations include the following: -

Proactive action for biodiversity conservation: The EACOP team should pick interest in practices that enhance the quality of the habitats affected by the project, as provided for in the conditions of the ESIA Certificate and other laws of Uganda. For example, the project should support initiatives for the establishment of Chimp Corridors in Wambabya forest to allow easy unfettered movement of Chimpanzees

from one Central Forest Reserve (CFR) to other areas as provided for under section 3.3.2 (vii)²³ and 3.3.2 (viii).²⁴ Similarly, the team should proactively work with NFA and other actors to support initiatives for the restoration of the natural forest estate especially in Wambabya and Taala Forest reserves.

Deliberate company policy dissemination: The EACOP team should make a deliberate effort to engage communities about a number of company policies, practices and the company motivations. EACOP team should cover the information gap in communities where they operate so that the pipeline host communities are kept updated about the plans and progress of the project to manage expectations and anxiety.

Communication and information sharing: The EACOP project needs to put in place a communication and engagement structure to keep PAPs in particular and stakeholders in general updated on development processes. A deliberate effort should be made to translate the content on signposts from English to local languages for effective communication and consumption of messages. In the same vein, there is need to repaint and update the rusty and empty notice boards in Kyotera district.

Collaboration and stakeholder engagement: There is a need for the EACOP to collaborate with local CSOs engaged in promotion of clean energy adoption to integrate in the project access to clean energy solutions and natural based enterprises such as apiary (bee keeping) as a contribution towards minimizing the destruction of existing natural forests such as Wambabya, Taala Forest which are already on a degrading trend.

Grievance management: There is need to conduct capacity building sessions for community development officers at sub-county level on grievance management. There is also need to develop a structure for engagement of the PAPs and a framework for providing copies and or records of grievances handled to lower local governments to enhance information sharing.

Environmental quality enhancement for PAPs houses: As part of the

23 Develop a comprehensive biodiversity management plan for primates and other habitats adjacent to the pipeline corridor between Bugoma and Wambabya CFRs in consultation with the Uganda Wildlife Authority and the National Forest Authority prior to implementation of project activities.

24 Schedule constriction activities in the corridor between Bugoma and Wambabya CFRs to a season when activities do not affect migration of primates as will be guided by the biodiversity management plan

design of the resettlement houses, the EACOP team should work with the contractors responsible to provide eco-friendly facilities - waste management containers and or bins, and train the PAPs on how to manage waste at the household level.

Livelihoods support and enhancement: The EACOP and the sector regulators -Petroleum Authority of Uganda (PAU) need to rethink the entire livelihoods restoration programme to ensure sustainability. The district leadership and lower local governments should be involved in the design and implementation of these programs. It is also urgent and important that these programs are integrated in general government programming including streamlining them in sub-county development plans. It is also urgent that the EACOP team addresses the issues of water for irrigation in particular at Kijumba demonstration garden.

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ABOUT ACODE and CSCO

The Advocates Coalition for Development and Environment (ACODE) is an independent public policy research and advocacy think tank based in Uganda. ACODE's work focuses on four programme areas: Economic Governance; Environment and Natural Resources Governance; Democracy, Peace and Security; Science, Technology and Innovation. For the last eight consecutive years, ACODE has been ranked as the best think tank in Uganda and one of the top 100 think tanks in Sub-Saharan Africa and globally in the Global Think Tanks Index Report published by the University of Pennsylvania Think Tanks and Civil Societies Program (TTCSP).

The Civil Society Coalition on Oil and Gas (CSCO) is a loose coalition of over 60 civil society organizations that work to promote sustainable development of Uganda's oil and gas sector. Over the years, CSCO has collaborated with the oil companies, the Petroleum Authority of Uganda (PAU), and the Ministry of Energy and Mineral Development (MEMD) to monitor the Upstream and Midstream oil and gas activities in the Albertine Graben. CSCO is hosted at ACODE.



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