CSO MEMORANDUM PRESENTING WEAKNESSES AND GAPS IN THE EACOP ESIA REPORT AND RECOMMENDATIONS TO NEMA FOR ACTION

NATIONAL ENVIRONMENT (NEMA)
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1. INTRODUCTION

On July 23, 2019, NEMA invited the public to submit their comments on the Environmental and Social Impact Assessment (ESIA) report for the East African Crude Oil Pipeline (EACOP) oil project.

The undersigned CSOs and individuals from eight districts and 41 villages from the oil affected region appreciate the developer's efforts in compiling and sharing the EACOP ESIA report that generally provides an overview of the project description, some potential impacts, lists of species and ecosystems, lists of national and international laws, names of projected mitigation plans and strategies and others.

In this memorandum which has been prepared by the aforementioned undersigned CSOs and individuals to promote environmental conservation and livelihoods amidst oil risks and threats, we outline some of the main gaps and weaknesses in the 3,599 page EACOP ESIA report dated January 2019. The gaps and weaknesses identified in the EACOP ESIA report cover areas of legislation; biodiversity, climate change, water, socio-economic potential of the project, transboundary and others. We believe that the current ESIA report like that of Tilenga and Kingfisher is a bad report to base on when making critical decisions such as the EACOP project and its implications on the environment. In this memorandum, we give evidence for each identified weakness and gap call upon NEMA not to approve the report.

Table of weaknesses and recommendations for NEMA

No.	Weaknesses/gaps in the EACOP ESIA report	Recommendations
1.	**Inadequate mitigation measures for vulnerable and threatened species:** The ESIA does provide information on ecosystems and their benefits that will be disturbed, particularly habitats for species of conservation concern and migration routes.	The EACOP ESIA lacks complete mitigation plan/s for the identified critical biodiversity resources and as such it

1.	However, the absence of complete Environmental and Social Management Plans (ESMP) for the entire EACOP ESIA report makes it difficult for the public to assess whether the mitigation plans that will be put in place at a later date will effectively protect vulnerable, endangered and endemic species like chimpanzee among others. It should be noted that the none-technical summary (NTS) refers to a long list of additional management plans, still to be developed, to further reduce and manage impacts and address stakeholder concerns. It is not clear how adequate they will be, nor when exactly they will be developed other than the mention of 'prior to commencement of construction'. It is not clear why the developer thinks that NEMA as a regulator should make such a critical decision regarding a project of the EACOP magnitude based on future intentions. To do that would be irrational, illogical and dangerous, to say the least. Like it happened with Tilenga and Kingfisher ESIA reports, the EACOP ESIA does not contain complete management plans with timeframes, budgets, required human resource and skills, etc. Mere mention of a management plan does not help anyone to make a right decision. Its unfortunate that a big and skilled company like Total can shamelessly produce and present this kind of incomplete report to NEMA for decision making regarding oil exploitation and conservation. The current EACOP ESIA report is like a house plan that does not contain estimates for walls, roofing and other components of the house. Such is not a plan and can never be approved by any professional to commence building of the said house.	should be rejected by NEMA. An ESIA report that does not have all complete mitigation plans and is based on future intentions is not no ESIA and therefore can never be a good basis for decision making.
2.	**Impacts of digging trenches on rivers and wetlands crossed by the pipelines:** This component is ignored and the ESIA report does not give justification as to why the proposed technology is acceptable. Also some other water-related issues are not fully clear like potential conflicts between water needed for the project and water supply for people and animals in the project areas. The ESIA report also does not indicate what the depth, width of the trenches that will be dug and what impacts they could cause on the water system. This may destabilize the water flow, cause contamination and can affect the communities surviving on these water bodies downstream.	NEMA should not approval an ESIA report that lacks information regarding the protection and safety of communities' water rights.

3	**The Climate Impact Assessment is Wrong:** An understanding of the East Africa Crude Oil Pipeline must begin with the nature of the material the pipeline would transport: a waxy variety of crude oil that solidifies at ambient temperatures and must be heated to at least 50^{o} C throughout the 1443-km length of the pipeline to arrive at a port for international export, vastly increasing the environmental and economic costs of exploiting Lake Albert area crude oil reserves. An understanding of the East Africa Crude Oil Pipeline must also begin with the fact that world's temperature has increased by an estimated 0.9^{o} C as atmospheric levels of carbon dioxide (CO_2) have risen from 290 parts per million (ppm) in pre-industrial times to more than 415 ppm in 2019, an atmospheric level of CO_2 that has not existed since at least three million years ago. The Intergovernmental Panel on Climate Change (IPCC) is warning that a further increase of the world's temperature by more than another 0.6^{o} C, a consequence of CO_2 levels exceeding 450 ppm, would have far-ranging catastrophic consequences on humanity, including food security and livability of cities. Section 8.22 of the ESIA is titled "Climate" and sub-section 8.22.2 of the ESIA is titled "Project Greenhouse Gas Emissions." This Section of the ESIA confines its assessment to only the operational emissions of CO_2 and reaches the following conclusion (on page 8-370). "The following are the key conclusions related to the EACOP project's impact on climate: Direct operational emissions in Uganda once the bulk heaters begin operation will range between 11–18 ktCO2e/a, which represents around 0.014–0.029% of Uganda's total GHG emissions in 2030: the contribution of EACOP to national emissions is therefore low and will not affect Uganda's ability to meet its emission reduction target published as part of the UNFCCC's Paris Agreement." The claim that the project's emissions would be 11–18 kilotons of CO_2-equivalents per year ktCO2e/a) is grossly inaccurate as these emissions do not include indirect emissions, which (as stated on page 8-368) are "end use of the products derived from the crude oil." As stated in the ESIA, the purpose of the EACOP project is to transport 216,000 barrels per day of crude oil from the Lake Albert area so that the crude oil can be refined into transportation fuels that are used to power internal combustion engines, adding to the global atmospheric burden of CO_2 levels. Table 8.22-1 of the ESIA states that EACOP crude blend E1 has a fuel density 868 kilograms per cubic meter	Indirect CO_2 emissions of the EACOP project would *have immense environmental, social, economic, and moral dimensions*. Approval of the ESIA for the project without scrutiny of the consequences of its indirect CO_2 emissions should be set aside as irrational.

	(kg/m3), resulting in CO_2eq emissions of 3.14 kg/kg of fuel. End use of the products derived from the crude oil (combustion of transportation fuels derived from EACOP crude blend E1) *must be at least this high*. One barrel of EACOP crude blend E1 has a volume of 0.16 cubic meters (m^3) and the purpose of the pipeline is to transport 216000 barrels per day, equivalent to 78.8 million barrels per year, 12.6 million m^3 per year, 10,900 million kilograms per year, or 10.9 million metric tons per year. If combusting 1 ton of EACOP crude blend E1 results in 3.14 tons of CO_2eq emissions, then indirect emissions of the EACOP project would be at least 34.3 million metric tons of CO_2eq emissions per year – *2000 times higher than* the operational CO_2eq emissions assessed in Section 8.22 of the ESIA The Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) has published estimates of the social cost of CO_2 emissions to allow agencies to incorporate the social benefits of reducing CO_2 emissions into cost-benefit analyses of regulatory actions. In the methods adopted by IWG, the social cost of carbon is defined as: "[T]he monetized damages associated with an incremental increase in carbon emissions in a given year. It is intended to include (but is not limited to) changes in net agricultural productivity, human health, property damages from increased flood risk, and the value of ecosystem services due to climate change." The most recent estimates of the social cost of CO_2 emissions is presented in the following table: As noted above, from 2025 to 2029, indirect emissions of the EACOP project be at least 34.3 $MtCO_2$eq per year. Applying the most recent Central Value (3% discount rate) and converting 2007 dollars to 2018 dollars, then estimates of the social cost of CO_2 emissions of the EACOP project would be as follows: For the years 2025-2029 inclusive: • $9.62 billion ($46/tCO_2eq x 34.2 million tCO_2eq/year x 5 years x 1.22)	
4	**The Economic Impact Assessment is Wrong and Fails to Discuss Substantial Risks:** Section 8-11 is titled Economy and presents an assessment of the possible impacts of the EACOP project on the economy. In this section, only the benefits of the project are presented. During the construction of the EACOP project, page 8-164 of the project states "The total direct, indirect and induced economic impact of EACOP's Capex on the Ugandan economy amounts to an estimated USD 224 million (UGX 839.8 billion) per annum for the three-year construction period, equivalent to	The EACOP project has substantial inherent economic risks that can result in substantial *environmental and social consequences for Uganda and its citizens*. Approval

	0.9% of 2015 Gross Domestic Product (GDP)." During the operation of the EACOP project, page 8-166 of the project states: "The total direct, indirect and induced economic effect of EACOP Opex on the Ugandan economy amounts to an estimated USD 54 million (UGX 203 billion) per annum for the duration of pipeline operation, equivalent to 0.2% of 2015 GDP." These estimates ignore risks of the EACOP project that are well-known to investors and the financial community, but have not been provided to NEMA and stakeholders in the ESIA document. In 2018, Assaye Risk, a risk management consultancy, with offices in the United Kingdom, Tanzania, and Uganda, published a risk analysis report of the EACOP project containing information that was excluded from the ESIA. To begin with, the ESIA makes no mention of the substantial debt the Government of Udanda might need to take on to fund construction of the project. The Assaye Risk report states: "Funding concerns. Ugandan President Yoweri Museveni has promised that the EACOP will achieve all the necessary financing to achieve completion by 2020. Thus far, only Tullow Oil has committed funding for 10% of the project. The majority of funding is set to come from government debt financing which could be problematic given the ongoing deficits which Tanzania (5.3%) and Uganda (4.9%) both have. Additionally, large scale infrastructure development projects in each of the countries will compete for government finances. Consequently, some financial advisory companies involved with the EACOP, such as Standard Bank, have been sceptical of President Museveni's claims that the project will be completed by 2020. "As part of a strategy to entice foreign companies to invest in the EACOP, Uganda and Tanzania have agreed that companies involved with the construction of the project will not be subject to Value Added Tax (VAT) or corporate income tax. Whilst it remains a possibility that rising government debts may force the Ugandan and Tanzanian governments to introduce a series of taxes against these companies, the reputational damage this would cause with investors makes this unlikely." Page 8-164 of the ESIA reveals that the capital construction costs of the EACOP project is USD $3.5 billion. The possibility that the Government of Uganda would borrow heavily to finance construction of the EACOP entails substantial consequences and risks that that are not accounted for in the ESIA. First of all, the EACOP project might never earn a profit, a fact admitted in the ESIA. Page 8-164 of the EISA states: "This government income stream from taxes has not been quantified in the assessment. As an equity partner, the	of the ESIA for the project without scrutiny of these risks should be set aside as irrational.

	government will derive income from its equity share of the tariff and profits from pipeline operation (*or incur losses if the pipeline is not profitable*). The income cannot be estimated based on the currently available information, but it is expected to be positive (i.e., profitable)." There are several reasons why the Government of Uganda *might incur losses* from operation of the pipeline, and a main reason deals squarely with the issue of climate change. The profitability of the EACOP project depends on enough cars, trucks and other vehicles in the world continuing to exist with *internal combustion engines* in sufficient numbers to economically justify purchasing the costly waxy crude oil from the Lake Albert crude oil reserve that would emerge at the end of the East African Crude Oil Pipeline. However, averting catastrophic climate impacts requires reducing the global scale of vehicles with internal combustion engines. As the IPCC has stated in its report Mitigation Pathways Compatible with 1.5°C in the Context of Sustainable Development: "Demand-side measures are key elements of 1.5°C pathways. Lifestyle choices lowering energy demand and the land- and GHG-intensity of food consumption can further support achievement of 1.5°C pathways (high confidence). *By 2030 and 2050, all end-use sectors (including building, transport, and industry) show marked energy demand reductions in modelled 1.5°C pathways, comparable and beyond those projected in 2°C pathways.* …. "Transport accounted for 28% of global final energy demand and 23% of global energy-related CO_2 emissions in 2014. Emissions increased by 2.5% annually between 2010 and 2015, and over the past half century the sector has witnessed faster emissions growth than any other. The transport sector is the least diversified energy end-use sector; *the sector consumed 65% of global oil final energy demand, with 92% of transport final energy demand consisting of oil products (IEA, 2017a*), suggesting major challenges for deep decarbonization. "In road transport, incremental vehicle improvements (including engines) are relevant, especially in the short to medium term. *Hybrid electric vehicles are also instrumental to enabling the transition from internal combustion engine vehicles to electric vehicles, especially plug-in hybrid electric vehicles.* Electrification is a powerful measure to decarbonize short-distance vehicles (passenger cars and two and three wheelers) and the rail sector." This year (in 2019) tesearchers with the School of Economics and Finance, Queensland University of Technology, published a study about how the transition from internal combustion engine vehicles to electric vehicles (especially plug-in hybrid electric vehicles) has major implications for the profitability of projects like the EACOP. The pipeline would not deliver crude oil to the market until 2022 at the earliest, considering a minimum 6-month regulatory approval period and a two-year construction schedule. In their recent study, these researchers concluded: "From the surveyed recent studies there is the view that there is already an underlying non-subsidised price parity	

between EVs and ICVs which will be realised in the market place once economics of scale are achieved. *Moreover, there is an emerging consensus that EV costs will continue to fall in line with cheaper battery costs while ICVs will, if anything, increase in cost as fuel efficiency standards are raised*. Further, there is broad acceptance that the future of autonomous vehicles and car sharing will be inextricably tied to the advent of EVs.

"*Thus, once consumers are given the option of substantially cheaper per km travel via SEAVs and as the concept of TaaS takes root, it is being predicted that ICVs will suffer a further substantial decline in cost competitiveness.* This raised the obvious question as to whether manufacturers will choose to meet mandated higher fuel efficiency by downsizing or through new fuel saving technology or simply switch to EVs. It therefore seems to be a risky assumption by oil companies that manufacturers will willingly invest to meet rising fuel economy standards for ICVs in order to sustain a major share of the automotive mix.

"*For their part manufacturers will also be acutely aware the international community is increasingly unlikely to meet the COP 21 GHG emission reduction targets for holding global warming to 2 ◦C. They will also not be unaware that, over the next several decades, the transport sector will receive far great attention as the single most cost effective way of reducing GHG emissions. That is, transitioning from IC to electric propulsion will soon be cost free as EV/ICV parity is reached. Moreover, over the longer term, consumers stand to reap an increasingly large saving given the expectation that the cost per km of EVs will continue to fall below that of ICVs*. For developing countries – and in particular China and India – where the bulk of the increased vehicle population will occur, these advantages will be greatly magnified through reducing the negative quality of life and health effects of dangerously high urban pollution levels.

"In such an environment there are strong incentives for automotive manufacturers to lock in long term viability and profitability by transitioning sooner rather than later to EVs. *For their part, oil companies are signalling through their upward revisions of EV market penetration that they are not unaware of how quickly the cost gap with ICVs is being closed. Equally, they will be aware that environmental drivers are likely to accelerate the EV/ICV transition given parity will make the transport sector the most cost effect means to deliver a substantive lowering of GHG emissions.*"

Simply put, the Government of Uganda, already saddled with substantial debt, is proposing, via the EACOP project, to borrow billions more a scheme for a product (crude oil) the world will begin to shun 5 to 10 years from now because of the necessity to reduce CO_2 emissions and because of the lower costs and environmental benefits of electric vehicles. Under this foreseeable scenario, the EACOP project generates large losses, crippling the ability of borrowers, including the Government of Uganda, to pay back their debts.

	However, these are not the only financial risks of the EACOP project. The Assaye Risk report identifies two other foreseeable risks, lack of infrastructure and lack of skilled workforce. With respect to the first risk, the Assaye Risk report states: "Infrastructure and electricity requirements. *The project is likely to face delays if insufficient infrastructure surrounding the project is not constructed alongside the building of the EACOP*. Tanga port requires the construction of the Handeni-Singida highway to allow for the EACOP construction materials to be transported along the planned route. Furthermore, six pumping stations and a marine storage terminal at Tanga are needed for the crude oil to be transported to international markets. The Ugandan government has announced a 21% budget increase in road infrastructure, however, significant challenges for transporting goods along the EACOP route are almost certain to persist in 2018/19. "The EACOP requires a large input of electricity to be operationally effective. Uganda is spending USD$2.2bn on two hydropower plants which is expected to add 783 MW of power to the grid. Similarly, Tanzania has outlined plans to invest USD$3.6bn (25% of the total Tanzanian budget) into the Stiegler's Gorge hydropower project. *It is possible that funding for hydropower projects could compete with funding for the EACOP, leading to further delays.* Whilst competing funding and stable sources of power are areas of concern, the greatest obstacle is likely to be expansion of the electricity distribution network. On 21 June 2018, these fears were alleviated to some extent by the World Bank's approval of a USD$455mn loan to Tanzania for "infrastructure that will support the electrification of the southern and north-western regions of Tanzania." With respect to the lack of a skilled workfoce, the Assaye Risk report states: "*Uganda and Tanzania will face challenges in employing local workers with sufficient construction, engineering and electrical qualifications to work on the EACOP. This will result in workers from foreign countries being brought in to work on the project*. Without adequate training institutions, local communities will not benefit from EACOP employment. "Another potential scenario is generated when the assumption for the 'Skills, employment and local community benefits' driver is changed. For this scenario, the assumption becomes "EACOP land acquisitions prove unpopular with local populations and this results in the disruption of production along the pipeline." The altered assumption generates a fourth alternative scenario: "Local community benefits promised by both governments are not delivered across all communities. *The governments are forced to acquire land from local communities to build the EACOP which leads to the loss of*	

	employment and livelihoods for those communities. A lack of retraining opportunities for the displaced workers creates issues for agricultural workers looking to benefit from EACOP employment. This results in civil unrest amongst communities and attempts to sabotage the development and operations of the EACOP as previously seen with other pipelines, such as the Trans Mountain Pipeline in Canada and the Trans-Adriatic Pipeline (TAP) between Greece and Italy. Consequently, the respective governments are forced to increase security to prevent incursions which disrupt production on the EACOP. International Non-Governmental Organisations (INGO's) increase negative publicity on the EACOP which gives reputational damage for the companies and governments involved."	
5	**Impacts to surface water have not been assessed:** Constructing and testing the integrity of an oil pipeline prior to its service requires substantial quantities of water. However, the ESIA reveals that Total East Africa Midstream BV *does not know where this water would come from*. Page 2-24 of the ESIA states: "For hydrotesting, described in Section 2.4.2.2, *a hydrotest management plan will be prepared that will identify water sources and discharge options* which will serve as the basis for a surface water abstraction permit application to the Uganda Department of Water Resources Management and discharge approvals which may be acquired." Page 2-29 of the ESIA further states: "The estimated project water requirements are: • construction camps – potable water 200 m3/day at maximum occupancy (up to 1000 people) • construction activities – 100–200 m3/day • *hydrostatic testing 16,000 m3 per test section required*, see Section 2.4.4.2." Page 8-95 of the ESIA further states: "Hydrotest Water Disposal "Impact: Deterioration of water quality "Disposal of the hydrotest water may impact the quality of the receiving water, depending on the waterbody receiving the discharge. Potential receiving surface locations or waterbodies	An ESIA should never conclude that the impact to surface waters is interminable, especially considering the substantial quantities of water needed for testing of the pipeline. Approval of the ESIA without determining the precise location and impact to surface water should be set aside as irrational.

	will be identified in the above-noted hydrotest management plan. *Even though the impact is expected to have a transient duration and localised extent, in the absence of a defined receiving waterbody, the significance of the impact of abstraction is indeterminable*. Unless the entire EACOP project is undermined by the lack of water available for hydrostatic testing, there was no obstacle in the way of Total East Africa Midstream BV preparing and including in the ESIA a hydrotest management plan that identifies surfaces waters from which testing waters would come from and spent testing waters would be discharged. An ESIA should never conclude that the impact to surface waters is interminable, especially considering the substantial quantities of water needed for testing of the pipeline. Approval of the ESIA without determining the precise location and impact to surface water should be set aside as irrational. Transportation pipeline pigging wastes are classified as a hazardous waste because of benzene (a known human carcinogen) in the waste that is component of crude oil. Despite the fact that pigging waste is classified as a hazardous waste, the ESIA for the EACOP acknowledges that Total East Africa Midstream BV has not identified the amount of such waste that would be generated or where it would be disposed. Page 2-64 of the ESIA states: "2.4.5.5 Operations Waste Management "An operational waste management plan will be developed which identifies waste types and volumes, and locations where these may be generated. The plan will be based on the same elements as the construction waste management described in 2.4.2.8, waste avoidance, reduction, reuse and recycling, and disposal. Expected waste types will include: "solid – wax deposited in the pipeline will be cleared from the pipeline by pigging operations. Most of the wax will be reinjected into the pipeline. Disposal space will be provided for residual wax not deemed suitable for reinjection. " hazardous – operational hazardous waste plans will be generated. Other than trace amounts of biocide; anti-corrosive, oxygen scavenger; and maintenance wastes, no hazardous wastes are expected from typical pipeline operations. The preferred and alternative waste management methods used will be waste specific. When these methods are not available, the waste will be stored safely while a method is developed."	

6	**Unjustified expectations of jobs and economic benefits:** The EACOP ESIA report raise high expectations of citizens with respect to jobs and other economic benefits but a critical assessment of the provided information in the ESIA report, the report lacks reasoning and justification for their conclusion of the said jobs and economic benefits. This makes the ESIA report exaggerated and not a good basis for decision making. The number of jobs, suitable for local workers, is probably very limited and all the investments are tax payer money, of which the major part is paid to international parties/workers and financiers. Raising unjustified expectations will create a lot of disappointments and can result in civil strife in future.	NEMA should not approve an ESIA report that makes conclusions without evidence.
7	**Land acquisition, resettlement, and compensation challenges not addressed:** Although the ESIA report has indicated that they will conduct land acquisition through development of Resettlement Action Plans (RAP) and Livelihood Restoration Plans that will be informed by various socio-economic baseline studies, there is no guarantee that the communities will be compensated fairly and adequately based on the national laws and international best practices. The experience from the Kingfisher and Tilenga ESIA indicate that NEMA is either weak or incompetent to enforce issues of compensation to the extent that in the above two cases, NEMA does not share the RAP/s as part of the ESIA report claiming that they do not have the mandate on RAPs yet the law provide that its NEMA to regulate the environmental and social impacts of any project. It is indeed sad that as NEMA calls on the public to submit comments, the EACOP RAPs are in final stages of implementation or half way implemented. This creates an impression that the ESIA review process is a mere formality and NEMA has no stamina to reject the ESIA report even where the impacts cannot be mitigated. Otherwise, why would the government implement the RAPs before is assured that NEMA will approve or reject the ESIA as a basis for the project to go ahead. Currently, the affected communities have no one to help them negotiate and determine what is fair, adequate and prompt compensation as provided for under article 26 of the constitution. The poor communities find themselves	NEMA should not approve the EACOP ESIA until complete RAP reports are shared as part of the ESIA and there is a clear commitment that affected people will get fair, adequate and prompt compensation including those who lose ecosystems services beyond legal and equitable land rights.

	facing the multinational companies to negotiate their compensation based on the district rates and Chief Government Valuer who never consult them. The absence of the law that determines what is fair, adequate and prompt compensation leaves the PAPs at the mercy of government and the developer yet experience from other affected communities shows that government and companies pay unfair, inadequate and delayed compensation.	
8	**Transboundary impacts not identified and mitigation measures presented:** The ESIA report indicates that the EACOP project will be running from the oil fields at Kabaale-Hoima, western Uganda to Tanga port in Tanzania transporting crude that will be electrically heated throughout the distance of over 1,443km including the Tilenga and Kingfisher feeder pipelines. However, the ESIA report does not identify any possible transboundary impacts that might occur as a result of the EACOP and its other associated sub-projects. Moreover, such impacts could affect not only Tanzania but also other neighboring countries. In addition, there is no framework for how impacts that have been created in one country and affect the other will be managed. More so, the current ESIA report lacks a summary of the entire EACOP project from Kabaale to Tanga thus creating an impression that the sections of the pipeline in the two countries constitute two projects and yet anything that happens on the pipeline in one country has the potential impact the other country. Furthermore, the ESIA report points out that during transportation of crude oil, some residual impacts may remain and have been graded as not significant meaning no further action may be undertaken to mitigate them. It should be noted that impacts arising from project such as oil are volatile and could significantly impact on the environment and people.	NEMA should halt the EACOP ESIA report approval until the developer addresses the key information regarding the mitigation measures for the trans boundary impacts.
8	**Limited mitigation measures on heating of the pipeline:** The ESIA report recognizes that because of the waxy nature of Uganda's oil, it will be heated at 50 degrees centigrade to enable it flow and has proposed to have heating points at different intervals along the pipeline route. In addition, the ESIA has identified accompanying impacts on the surrounding communities and environment. However, out of the proposed 37 heating points in the 1,445km distance, 35 will be located in 296 km pipeline on	NEMA should not approve the ESIA report as it does not meet the required standards on impacts and mitigation.

	the Ugandan side while only 2 will be in 1,149 Km distance on the Tanzanian Side. The reason for difference of the heating points is the technology choice where Polyurethane foam has been preferred on the Tanzanian side. The ESIA has not given justification as to why no insulating is done on the Ugandan side hence requiring 35 heating points which increases environmental impacts and social impacts of the pipeline.	

CONCLUSION

We appreciate the developer's vision and promise to protect and promote social and environmental aspects in the development of EACOP oil project. However, the current EACOP ESIA report does not provide evidence that the project will not destroy environment and livelihoods in Uganda.

In general terms, we find the report biased in stressing the positive impacts while paying little attention to the negative social and environmental impacts of the EACOP project. For example, employment and other economic benefits are highlighted while impacts on conservation are concluded as being insignificant. More so, cheaper options such as open excavations or open cut method are recommended by the ESIA at river crossings while environmentally sound options (Horizontal Direction Drilling) are downplayed by the same ESIA clearly showing a case of bias.

Many recommendations are derived from use of secondary data without undertaking detailed primary data collection. The report generalizes issues across the length of the ESIA report, paying little attention to major differences in ecosystem variations and distributions of Above the Ground Installations. In a number of cases the conclusions are not based on evidence and some assessments lack justification.

We therefore recommend NEMA to reject the EACOP ESIA report because its approval will endanger the environment and livelihoods.

Thank you,

Yours faithfully,

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37	Busobozi Suliat	**BTC**
38	Wembabazi Priscilla	**Kizikya**
39	Wabyona Cosma	**Cdukuru**
40	Balach Bakudane	**AFIEGO**
41	Nyedwoha Steven	**Hoima**
42	Sandra Atusinguza	**AFIEGO**
43	Ajaru Charles	**Kisomere**
44	Oryek Ronald	**Kisomere**
45	Balemesa Bob	**Kibambura**

46	Manyireki Cathebert	**Kijangi**
47	Mugabo Micheal	**Garasoya**
48	Okumu Micheal	**Walya 11**
49	Bedjo David	**Pondiga**
50	Oloya Alfred Ozelle	**Beroya**
51	Isaac Bacyesiima	**Hoima**
52	Edward Wamugasa	**Kakindo**
53	Katumba Benson	**Ngwedo**
54	Tumwesige Patrick	**Garasoya**
55	Mujuni Gilbert	**Garasoya**
56	Atuhairwe Janet	**Kiyago**
57	Abikuha Nicholas	**Kisansya**
58	Ayesiga Wyclif	**Kisangi**
59	Kyalisima Pamella	**Buliisa TC**
60	Alinda Juliet	**BTC**
61	Catherine Twongyeirwe	**AFIEGO**
62	Ofoyrwoth Emmanuel	**Magali**
63	Isingoma David	
64	Businge Moses	**Karuka**

65	Owekomu Aduba	**Karuka**
66	Rugadya Oscar	**Serule**
67	Mugisha Charles	**Butiaba**
68	Kyaligonza Ronald	**Booma**
69	Amanya Godfrey	**Butiaba**
70	Mugume Patrcik	**Butiaba**
71	Miria Sunday	**Butiaba**
72	Obedgui James	**Itutwe**
73	Upoki Stephen	**Tangala**
74	Akugizibwe Milton	**Kashemura**
75	Bujune Scovia	**Biisa**
76	Beriu Sylivia	**Bukumi**
77	Okura Patrick	**Tangala**
78	Urombi James	**Biiso**
79	Jarieko Alfred	**Nyamasoga**
80	Uyergui Francis	**Nyamasoga**
81	Tibeijuka Edwin	**Garasoya**
82	Tumusiime Geofrey	**Akollo**
83	Bamuturaki Moses	**Garasoya**

84	Katulinde Jackline	**Akiimi**
85	Kalibagwa Gilbert	**Garasoya**
86	Basenera Brenda	**Kyabunigi**
87	Arthur Agaba	**Nyeramya**
88	Oryek John	**Akiimi**
89	Atugonza Doreen	**Kabaseka**
90	Namara Patience	**Bukoba**
91	Patrick Adema	**Bukoba**
92	Twongyeirwe Irene	**Kassawo**
93	Aryampa Brighton	**Bakompe**
94	Aryaijuka Simpe	**Kanyogoga**
95	Bariyo Gaudi	**Wamasonga**