



February 15, 2023

To: The Chairperson,
Ramsar Wetlands Committee-Uganda,
Ministry of Water and Environment (MWE),
Kampala (U).

Dear Sir/Madame,

**RE: REQUEST TO TAKE ACTION TO STOP DEGRADATION OF RAMSAR
WETLANDS DUE TO OIL ACTIVITIES**

Greetings from the undersigned Ugandan environmental and human rights civil society organisations (CSOs). We take this opportunity to thank you for your valiant efforts in promoting wetland conservation.

Because wetlands are important to Uganda, the country joined the rest of the world to mark World Wetlands Day on February 2, 2023. The day also marked the 52nd anniversary of signing of the Ramsar Convention, an “intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources.”

Uganda marked the World Wetlands Day under the theme, “It’s time for wetland restoration”.

In a speech¹ made a day before World Wetlands Day, the state minister for environment, Hon. Beatrice Anywar, noted that Uganda’s intact wetland coverage stands at 9.3%, up from 8.9% in 2015. The minister also observed that government had continued to put wetland conservation at the forefront.

We thank the Ugandan government and the Wetlands Department at the MWE, which you head, for prioritising wetland conservation.

However, we are concerned about the ongoing oil and gas exploitation activities and their impending impact on Ramsar wetlands in Uganda.

Through this letter therefore, we are requesting you to engage the Ugandan President, Minister of Energy and Mineral Development, Uganda National Oil Company, the Petroleum Authority of Uganda (PAU), TotalEnergies and China National Offshore Oil Corporation (CNOOC) to **stop any oil activities that are affecting or could affect Ramsar wetlands in Uganda.**

¹ Anywar, B. (2023). *Statement made by the Minister of Water and Environment on the eve of World Wetlands Day*: https://www.mediacentre.go.ug/sites/default/files/media/WORLD_WETLANDS_DAY.pdf

As you are well aware, Article 3 (1) of the 1971 Ramsar Convention to which Uganda is a signatory states that, “The Contracting Parties shall formulate and implement their planning so as to promote the conservation of the wetlands ...”

The ongoing oil exploitation activities that stand to affect Ramsar sites such as the Murchison Falls-Albert Delta Wetland System will not promote conservation. Instead, the activities stand to degrade the wetlands to the detriment of local communities, tourism operators and biodiversity conservation.

How so?

TILENGA OIL PROJECT

Under TotalEnergies’ Tilenga oil project, the company intends to extract oil from over 400 oil wells including 130 within Murchison Falls National Park (MFNP).

The company, whose partners on the project include CNOOC and the Ugandan government, also intends to develop infrastructure such as well pads, a water abstraction station, central processing facility, flow lines, and various oil pipelines including one that will be buried under River Nile.

The aforementioned pipeline is referred to as the Victoria Nile Crossing in the Tilenga oil project’s Environmental and Social Impact Assessment (ESIA) report².

Information in the Tilenga ESIA report indicates that “The HDD [Horizontal Directional Drilling] Construction Area north of the Nile and pipe stringing area will be located within the boundary of the Murchison Fall–Albert Delta Wetland System Ramsar site.”

Experts who reviewed the Tilenga ESIA report also noted that the ferry crossing on Lake Albert and two well pads, JBR 10 and 4, will affect or are close to the Ramsar site³.

The Tilenga ESIA notes that the “Potential impacts to the Murchison Falls–Albert Delta Wetland System Ramsar site were assessed to be High Adverse to Critical for all project phases.” These phases include the construction, operational and others.

ABOUT THE MURCHISON FALLS-ALBERT DELTA RAMSAR SITE

The Murchison Falls-Albert Delta Wetland System lies within the Lake Albert Basin and falls almost entirely within the boundaries of Murchison Falls National Park⁴.

The Ramsar site stretches from the top of Murchison Falls to the delta at its confluence with Lake Albert [4]. The Ramsar Site, which has been proposed to be listed as a UNESCO World

² TotalEnergies (2019). *Tilenga ESIA report*:

https://corporate.totalenergies.ug/sites/g/files/wompnd2271/f/atoms/files/esia_nts_tilenga_esia_28-02-19_reduced_size.pdf

³ Netherlands Commission for Environmental Assessment (2018). *Review of the ESIA report for the Tilenga project*: https://www.eia.nl/docs/os/i72/i7280/7280_ncea_review_esia_report_tilenga_project.pdf

⁴ Behangana, M. et al (2020). *Herpetofaunal Diversity and Community Structure in the Murchison Falls-Albert Delta Ramsar Site, Uganda*: https://www.researchgate.net/figure/Map-of-the-Murchison-Falls-Lake-Albert-Delta-Wetland-System-showing-the-study-transects_fig1_344192328

Heritage Site⁵, is important for Uganda's fisheries, tourism, biodiversity conservation and food security.

This is because the Ramsar Wetland is a spawning ground for Lake Albert fisheries, supports globally threatened bird species, and provides wetland habitat for biodiversity during the dry seasons. It is [also] an area of high species diversity and endemism making it a critical area for wildlife at the regional scale⁶.

Despite its importance, and despite the fact that the National Environment Management Authority (NEMA), stopped the issuance of permits for any new developments in wetlands, development of the Tilenga oil project is ongoing.

Indeed, the Ministry of Energy and Mineral Development has indicated that initial drilling (spudding) for the Tilenga oil project is slated to take place this year, despite experts indicating that the measures that were detailed in the Tilenga ESIA report to avoid, minimise or mitigate the project impacts are inadequate.

These impacts include loss of habitats for various species, disturbance in fish migration, oil spills thereby endangering community clean water access and species' conservation, water and air pollution, population influx and others.

THREATS TO OTHER RAMSAR WETLANDS

We are also concerned about the East African Crude Oil Pipeline (EACOP) project and its potential impact on wetlands belonging to Lake Victoria. The lake is home to Ramsar wetlands including Lutembe Bay (LTB), Mabamba Bay Wetland System (MBB), Nabajjuzi Wetland System (NBJ) and Sango Bay-Musambwa Island-Kagera Wetland System (SAMUKA).

The EACOP ESIA report is silent on which wetlands belonging to Lake Victoria have been affected by the EACOP project, leading to speculation that the aforementioned Ramsar sites stand to be affected.

CONCLUSION

Through this letter therefore, we are making the following requests:

- i. Work with PAU and NEMA to publicly avail information on which wetlands belonging to Lake Victoria have been affected by the EACOP project;
- ii. Engage the president, Minister of Energy, UNOC, PAU and NEMA to cancel any oil developments that are affecting Ramsar sites in Uganda.

We thank you in advance for your cooperation in this matter.

⁵ Ramsar Sites Information Service. *Murchison Falls-Albert Delta Wetland System*: <https://rsis.ramsar.org/ris/1640#:~:text=Murchison%20Falls%20are%20one%20of,illegal%20hunting%20for%20game%2C%20etc.>

⁶ Behangana, M. et al (2020). *Herpetofaunal Diversity and Community Structure in the Murchison Falls-Albert Delta Ramsar Site, Uganda*: https://www.researchgate.net/figure/Map-of-the-Murchison-Falls-Lake-Albert-Delta-Wetland-System-showing-the-study-transects_fig1_344192328

Signatories

1. Africa Institute for Energy Governance (AFIEGO)
2. African Initiative on Food Security and Environment (AIFE)
3. Centre for Agricultural Research and Innovation (CERAI)
4. Centre for Citizens Conserving Environment and Management (CECIC)
5. Environment Governance Institute (EGI)
6. East African Crude Oil Pipeline Host Communities (EACOPHC)
7. Environment and Human Rights Justice Centre
8. Friends of Nature
9. Friends of Zoka
10. Guild Presidents' Forum on Governance (GPFOG)
11. Strategic Response on Environment Conservation (STREC)
12. Youth for Green Communities (YGC)
13. Women for Green Economy Movement (WoGEM)
14. Buliisa Peace Initiative
15. Fridays for Future Uganda (FFF-U)

CC

- The President of Uganda
- The Minister of Energy and Mineral Development
- The Executive Director, Petroleum Authority of Uganda (PAU)
- The CEO, Uganda National Oil Company (UNOC)
- The General Manager, Total E&P Uganda
- The General Manager, CNOOC (U) Ltd
- The Managing Director, EACOP Company
- The Chinese Ambassador to Uganda