

# AFRICA INSTITUTE FOR ENERGY GOVERNANCE



Plot 1288, Space Centre building, Buwate - Najjera, P.O Box 34913 Kampala - Uganda  
Tel: +256-414 571587, Mob: +256 782 407085, Email: [afiegg@afiegg.org](mailto:afiegg@afiegg.org), Website: [www.afiegg.org](http://www.afiegg.org)

## CSOs COMMENTS ON THE KINGFISHER OIL PROJECT ESIA REPORT TO THE NATIONAL ENVIRONMENTAL MANAGEMENT AUTHORITY



14 May 2019

### A. INTRODUCTION

Between 9 April and 9 May, 2019, following NEMA's call for public comments on the Environmental and Social Impact Assessment (ESIA) report for the Kingfisher oil project, the undersigned Civil Society organisations (CSOs) organized and engaged with over 700 stakeholders from areas of Hoima, Kikube, Buliisa, Kakumiro, Kibaale, Masindi, Kyankwanzi and others to review and make comments on the over 4,000 paged Kingfisher ESIA report and the Non-Technical Summary (NTS).

Through the above engagements, the stakeholders appreciated the developer's efforts (CNOOC) in compiling the Kingfisher oil project ESIA report that generally provides key information on the potential environmental risks and challenges of the project.

The stakeholders noted with concern that while the ESIA report has some information that can be used to put in place measures to avoid or mitigate oil dangers on communities and ensure some level of conservation of the environment, the same ESIA report contains several gaps and weakness which cannot allow evidence based decision making on the part of the regulator/NEMA in a manner that would prevent oil harm on biodiversity and communities. To make it worse, the developer appears to be disingenuous because while the study covered both environmental and social impacts of the project, the developer did attach copies of the Resettlement Action Plan (RAP) reports to NEMA and in turn, NEMA did not publically share a full ESIA report including the project RAPs for public comments.

On 27 April when oil companies met CSOs to update them on the progress of the above studies, CNOOC informed the public that they had implemented the RAPs for Kingfisher oil project by 80% and yet NEMA was still waiting for public comments.

It is unfortunate, that the developer is hiding the RAPs away from the public and NEMA appears to be in approval of that secrecy. This secrecy is a violation of Article 41 of the Constitution as it does not fall in the exemptions of public security and or right to privacy.

Further, the undersigned CSOs note with concern that the Kingfisher project area is an area with critical ecosystems including Lake Albert, Bugoma Central Forest Reserve, Kamansinig River, River Nile and others. The project area also has communities that entirely depend on fishing for food, income and other critical aspects. The project must therefore be handled with utmost care and Uganda’s laws must be abided by to avoid or minimise oil impacts on the environment and communities.

In these comments, the undersigned CSOs outline some of the main gaps and weaknesses identified in the Kingfisher oil project ESIA report and the Non-Technical Summary. Unfortunately, the comments do not include a discussion on the RAPs because NEMA did not disclose them. This is regrettable.

Based on the identified gaps and weaknesses, the CSOs call on NEMA NOT to make any decision regarding the Kingfisher oil project as a measure to safeguard our environment and communities from oil dangers.

The section below presents the identified gaps and weaknesses in the Kingfisher oil project’s ESIA report:

## B. GAPS, WEAKNESSES AND RECOMMENDATIONS ON THE KINGFISHER OIL PROJECT ESIA REPORT

No.	Weaknesses in the Kingfisher ESIA report	Recommendations on what should be done to ESIA report
1.	<p><b>Lack of information about project impacts on climate due to carbondioxide (CO2) emissions:</b> The oil that CNOOC proposes to extract from the Kingfisher Field Development Area in the Albertine Basin is not ordinary oil.</p> <p>The oil can form stable emulsions of high pour point at 42-45 degrees Celsius, high wax content at 31.2 degrees Celsius and high wax appearance at 63 degrees Celsius. It should be noted that waxy crude needs viscosity correction to make it flow.</p>	<p>NEMA should not approve the ESIA report as it does not provide information on the financial viability of the Kingfisher waxy crude oil vis-a-vis the challenges of CO2 emissions and yet this is key for decision-making.</p> <p>It is clear that the waxy nature of Uganda’s crude oil will constrain its financial</p>

<p>The waxy nature of the crude oil from the Kingfisher Field Development Area means that its extraction would be associated with higher upstream CO2 emissions relative to the extraction of ordinary light crudes. The requirement of continuous heating of the waxy crude to around 70 degrees Celsius (around 160 Fahrenheit), and mixing the waxy crude with water would require CNOOC to burn substantial amounts of CO2-emitting fuels, in this case, liquid petroleum gases, to supply the heat and energy required to move the material from the flowlines to the central processing facility (CPF) and storage tanks at the CPF and the feeder pipeline to Kabaale refinery and export pipeline.</p> <p>Because of the high wax content and high pour point of the Kingfisher crude, it will be necessary to keep it at least 5 degrees Celsius above the wax appearance temperature (WAT) that is 63 degrees Celsius +5 degrees Celsius. This will apply to the entire oil extraction and processing chain, from the well pads through the flowlines to the CPF and storage tanks at the CPF and the feeder pipeline to Kabaale.</p> <p>Unfortunately, the ESIA report contains no information at all about the upstream and downstream CO2 emissions if CNOOC were to be granted a license to extract waxy crude from the Kingfisher Field Development Area. This is contrary to a growing body of court judgments around the world holding that the climate impacts of the upstream and downstream CO2 emissions of a fossil fuel extraction project must be included in the environmental assessment of a project to completely inform decision-makers and stakeholders of the project's environmental impact.</p> <p>Further, the waxy nature of the crude oil will constrain financial aspects of the project. Many research studies including the study, <i>Evaluating Uganda's Oil</i></p>	<p>viability including the financial aspects or viability of the Kingfisher project.</p> <p>Further, the ESIA report contains no information at all about the upstream and downstream CO2 emissions if CNOOC were to be granted a license to extract waxy crude from the Kingfisher Field Development Area. This is contrary to a growing body of court judgments around the world holding that the climate impacts of the upstream and downstream CO2 emissions of a fossil fuel extraction projects must be included in the environmental assessment of a project to completely inform decision-makers and stakeholders of the project's environmental impact.</p>
--	--

	<p><i>Sector Estimation of Upstream Projects</i>, by King Abdullah Petroleum Studies and Research Center indicate that, “The waxy nature of the Albertine crude suggests that it will not achieve the full market price per barrel, but will be discounted to reflect the costs implicit in its high wax content, need for upgrading and transportation to market.”</p>	
<p><b>2.</b></p>	<p><b>Dangers of acting on incomplete ESIA reports that lack RAPs on land acquisition and resettlements:</b> The None Technical Summary (NTS) of the Kingfisher oil project ESIA report states that the mitigations for the social and economic impacts of the land acquisitions under the Kingfisher project and resettlement activities shall be in the RAPs. However, these RAPs are not part of the Kingfisher ESIA report. NEMA is therefore calling on the public to present comments on both the social and environmental impacts of the Kingfisher oil project in absence of the said RAPs. If the RAPs are not part of the current ESIA report, it means that the developer presented an incomplete ESIA to NEMA and therefore any comments will be based on incomplete reports. This is contrary to the objective that necessitated Uganda’s shift from the Environmental Impact Assessment (EIA) regime to the ESIA regime. Undertaking and reviewing an ESIA requires that one assesses the environmental and social impacts of any proposed project as one component. The environmental and social impacts and risks should not be isolated from each other. It is therefore disingenuous on the part of the developer to hide the RAPs and then call on the public to comment on incomplete reports. This will worsen oil dangers in our country.</p>	<p>We call upon NEMA to ignore the developer’s current ESIA report until a full report including the RAPs is submitted. In absence of the RAPs, the ESIA report is incomplete and not fit for public comments. It violates the intent of the National Environmental Act of 2019 that requires the assessment of both environmental and social impacts of a project as one component. Unfortunately, as the public makes comments and NEMA continues to approve ESIA reports such as the Tilenga one, the country does not have ESIA and Strategic Environmental Assessment (SEA) regulations to strengthen enforcement and compliance. It is as if NEMA does not appreciate the dangers of approving ESIA reports for oil projects in absence of the above regulations. Uganda cannot achieve compliance of ESIA reports without the above regulations.</p>
<p><b>3.</b></p>	<p><b>The ESIA report lacks detailed information including a complete management plan to conserve Bugoma central forest reserve amidst oil</b></p>	<p>The information in the current Kingfisher ESIA is insufficient to enable NEMA make</p>

	<p><b>threats:</b> The Kingfisher ESIA report notes that a road will be constructed through Bugoma forest to support the Kingfisher oil project activities. In addition to the roads, a feeder pipeline for the Kingfisher project, the East African Crude Oil Pipeline (EACOP), an airfield in Buhuka and other infrastructure are being planned in and around the forest. These developments will open up the forest in particular and the oil region at large to an influx of people who will migrate to the oil region in search of jobs and other oil related opportunities.</p> <p>This will negatively impact on local community livelihoods and will result in degradation of Bugoma forest. Consequently, there will be a reduction in income from tourism and the role Bugoma forest plays in the provision of water to the entire catchment will be compromised.</p> <p>The current ESIA report however lacks a detailed plan with a budget, workplan and timelines to show how the Bugoma central forest reserve will be protected from the direct and indirect dangers of oil exploitation, especially the danger of population influx.</p> <p>Already, refugees and surrounding communities have encroached on the same forest in search of firewood and charcoal. In addition, sugarcane companies are threatening to wipe out the entire forest for sugarcane growing. Allowing oil activities in the Kingfisher Development Area in Buhuka will worsen the degradation of Bugoma forest.</p>	<p>the right decision that will guarantee conservation of Bugoma central forest reserve from the dangers of oil exploitation.</p> <p>A complete ESIA that provides detailed information on key conservation aspects such as a management plan for Bugoma forest should be put in place before NEMA makes any decision on the ESIA.</p> <p>The conservation plan should enable the regulation of population influx in and around Bugoma forest, restoration of lost vegetation, strengthen enforcement and compliance of laws and conservation strategies for especially endangered animals and plants species.</p>
<p><b>4.</b></p>	<p><b>Lack of information on dangers of over fishing on Lake Albert to local communities:</b> The Kingfisher ESIA report recognises that currently, Lake Albert provides 30% of the total fish produced in Uganda. However, the report does not provide information on the risks and dangers posed by the proposed Kingfisher oil project to fishing and how those dangers will be avoided.</p>	<p>NEMA should reject the report and direct the developer to put in place a costed and time-bound mitigation plan that shows how much money, human resources and other resources will be required to sustain fish stocks in Lake Albert amidst oil</p>

	<p>Further, the report rightly notes that the local population in Buhuka flats where the Kingfisher oil project is located depend on fishing as their source of food and income. However, the report does not provide information that shows how the livelihoods of communities that depend on fishing will be protected.</p> <p>The report lacks a complete management plan with budgets and timelines for effective monitoring and enforcement to protect the livelihoods of fishing communities. Without such a plan, there is no way the fishing industry of Buhuka shall be protected from the dangers brought about by oil impacts such as population influx. More so, the development of road infrastructure will ease access to fish markets and coupled with a population influx, risks such as over-fishing and other bad fishing habits will be seen. Further, oil from the Kingfisher project may also pollute the lake considering that the Kingfisher project's well pads are very close to the lake.</p> <p>To make matters worse, the current ESIA report lacks information on alternative options for the communities in case fish stocks in Lake Albert disappear or reduce to a level that they cannot sustain the communities' survival. If the oil project is allowed in these circumstances, it will endanger community livelihoods.</p>	<p>dangers. The plan should also clearly provide information on workable alternative options in case the fish stocks disappear and fishing communities' livelihoods are affected.</p> <p>Affecting fish stocks in Lake Albert will also cause transboundary conflicts with DRC because the said lake is a shared resource and the Kingfisher oil project's impacts on fishing cannot and will not be limited to Uganda alone. In case of any conflicts over fishing stocks, the local communities will be the ones to suffer most compared to government and oil companies which are pushing for the oil exploitation.</p>
<p><b>5.</b></p>	<p><b>Lack of information on transboundary management of water abstraction from Lake Albert and insecurity risks:</b> The ESIA report indicates that millions of cubic metres of water will be extracted from Lake Albert for oil activities. However, there is no framework for addressing conflicts over the utilisation of the Lake Albert waters and other resources such as fish by DRC and Uganda. The two countries continue to conflict over the boundaries of the lake.</p> <p>With the proposed extraction of huge amounts of water from Lake Albert by the Kingfisher oil project, it is not clear how the DRC will react to the decision</p>	<p>NEMA should reject the ESIA report and direct the developer to submit a comprehensive ESIA study that has a complete transboundary impacts management plan. The plan should contain information on budgets, timelines, human resources and others needed to avoid or mitigate transboundary risks arising from use of Lake Albert.</p>

	<p>considering that Uganda and DRC have in the recent past been conflicting over Lake Albert to the extent that since discovery of oil in 2006, some people including a Heritage Oil company Engineer have been killed on the lake due to conflicts.</p> <p>Further, the ESIA report does not provide information regarding how the horizontal drilling under Lake Albert in Buhuka and the extraction of water from the lake will be received by DRC. The report does not discuss the security risks and implications arising from water extraction and horizontal drilling under Lake Albert.</p> <p>Any increase in conflicts in the area should be avoided because it may lead to militias turning their guns against oil infrastructure such as well pads, CPF, water abstraction station and others resulting into loss of life and money. This may make the Kingfisher oil project worthless considering that increasing climatic changes and a push away from fossil fuels to clean energy are making oil investments unattractive.</p> <p>The current ESIA report does not provide information on how the developer intends to sufficiently address these and other related challenges that go beyond Uganda's borders.</p>	<p>This will ensure that plans for equitable benefit sharing of transboundary resources are in place to avoid or mitigate conflicts when they arise to avoid negative impacts on any one country.</p>
<p><b>6.</b></p>	<p><b>The ESIA report lacks information on compensation for communal land and other rights:</b> On pages 52 and 53, the Kingfisher ESIA Non-Technical Summary indicates that the Kingfisher oil project covers areas where some of the land is owned communally with communities enjoying grazing rights, water rights and others. However, there is no information in the report that shows how communal rights will be compensated and yet the people have enjoyed these rights for generations. As earlier discussed, NEMA called on the public to comment on an ESIA that does not include the RAP reports on land acquisition and resettlement.</p>	<p>NEMA should direct the developer of the Kingfisher oil project to go back to the field to conduct and compile a complete ESIA report with complete RAPs and mitigation plans. NEMA should avoid making any decision based on the current incomplete ESIA report. Doing so will worsen the dangers of oil exploitation on the environment and communities.</p>

	<p>It is therefore not possible for us to assess how communal land rights will be managed.</p> <p>Yet no compensation can be fair and adequate to meet the dictates of Article 26 of the 1995 Uganda Constitution without addressing the communal rights issues.</p>	
	<p><b>7. Lack of information regarding the selection of sites for the well pads:</b> The ESIA report indicates that all the four well pads that will be developed under the Kingfisher project are located either at the shore of Lake Albert and/or close to the proposed airstrip. On page 131 of the volume that contains information on Biodiversity Impact Assessment, the developer notes that the location of well pad 1 will have direct impacts on the Kamansinig River and will affect the functioning of the wetland, which are key components of this ecosystem. There also exist risks of possible accidents from aircraft especially for well pad 2 which is located near the airstrip. However, the ESIA report does not provide information to show that the developer explored alternative areas to locate the well pads to ensure that the river and other Buhuka wetlands that get flooded every year are avoided and or protected from oil dangers and risks. In absence of an alternative analysis, it means that the developer made decisions to locate the current well pads without taking into account other areas where the impacts would be avoided or reduced. This makes it hard for NEMA to make a balanced decision that can promote conservation amidst oil dangers.</p>	<p>NEMA should not approve the Kingfisher oil project ESIA report. The developer should provide alternative options for the location of all the four well pads.</p> <p>Otherwise, the location of the well pads 10 to 50 metres from Lake Albert is dangerous. It will expose the lake to oil pollution as well as expose the well pads to security risks from DRC in case of any possible conflicts.</p>



<p><b>8.</b></p>	<p><b>The Kingfisher ESIA report lacks a clear analysis regarding the implications of contradictory environmental laws:</b> The current ESIA report states that the study was conducted based on the 1995 National Environment Act and the 1998 EIA Regulations. However, the above mentioned laws provide for only environmental impact assessment. It is therefore not clear how the developer assessed both the environmental and social impacts of the Kingfisher oil project. It is even more confusing to note that the developer submitted an ESIA report to NEMA without copies of the RAPs and NEMA accepted the incomplete report. If what was conducted was an ESIA even when there is no law to support it, the RAP reports must be part of the ESIA report for it to be complete to enable the public make accurate comments and help NEMA to make the right decision.</p> <p>Unfortunately, it appears that NEMA thinks that it has no powers over RAPs and yet NEMA is responsible for environmental and social impact assessment processes. NEMA is mistaken to think that RAPs are not part of social impacts. These contradictions will undermine efforts to avoid and or mitigate the dangers of oil on the environment and communities.</p>	<p>NEMA should not approve the report but instead, it should direct the developer to provide a detailed analysis on the implications of the legal contradictions where ESIA reports are being produced based on the repealed 1995 National Environmental Act and the current 1998 EIA Regulations as well as the EIA Public Hearing Guidelines 1999 which do not provide for assessment of social impacts of projects.</p> <p>What is the effect of conducting and implementing RAPs as an isolated process from ESIA process on efforts to safeguard the environment and communities from oil dangers?</p> <p>The RAPs for the Kingfisher oil project should be attached to the ESIA report to enable the public comment on the full report as a means to help NEMA make an evidence-based decision.</p>
<p><b>9.</b></p>	<p><b>Lack of information on Environmental and Social Management Plans:</b> On pages 52, 63 and 66 of the None-Technical Summary, the report discusses the importance of social and environmental management plans. However, the same report does not provide complete plans for managing oil dangers such as</p>	<p>NEMA should not approve the Kingfisher project's ESIA report. Instead, NEMA should direct the developer to attach full mitigation plans as part of the ESIA report. An ESIA report that lacks full information</p>

	<p>population influx, workforce behavior, waste management, noise pollution, dust pollution, plan to manage oil impacts on fishing industry and others.</p> <p>In passing, the ESIA report indicates that NEMA and government of Uganda should handle some of the above responsibilities to mitigate the impacts. There are no direct obligations on the developer (CNOOC) to protect fishing communities, impact of roads on forests and others beyond their operational areas. This big gap will result in irreversible dangers if the Kingfisher oil project is approved based on the current weak ESIA report.</p> <p>NEMA should reject any ESIA report that does not include a management plan that has budgets, timelines and other critical information necessary for enforcement and compliance.</p>	<p>on management and mitigation plans is no report to be based on for decision making as incomplete mitigation plans cannot be enforced and ensure compliance.</p>
<p><b>10</b></p>	<p><b>Impact of heated pipelines on plants and animals:</b> While the Kingfisher project’s ESIA report notes that oil will be transported in heated pipelines from the oil wells to the CPF and to the oil refinery, it fails to provide information on the risks of heated pipelines on flora and fauna and how those risks can be avoided or mitigated.</p> <p>The impacts of heated pipelines on some sensitive ecosystems such as Bugoma forest which harbors chimpanzees could pose a serious threat to their habitat and sustainability.</p>	<p>The developer should be directed to provide information on the impacts of heated pipelines on animals such as chimpanzees. There is evidence that such animals can detect anything unusual under and or above the ground and may be negatively impacted by the heated pipelines. The developer should produce evidence that shows that such heating will not compromise wildlife.</p>
<p><b>11</b></p>	<p><b>Insufficient information on noise impacts:</b> The ESIA report does not provide sufficient information on how the noise from drilling activities, planes from the airfield at Buhuka and others will be handled to avoid impacts on Bugoma forest as well as aquatic life on Lake Albert.</p>	<p>The ESIA should provide a complete noise mitigation plan with budgets and timeframes for implementation. The communities should be involved in the formulation on the noise management plans to ensure public support.</p>

	<p>The information that noise issues will be handled between CNOOC and NEMA and not host communities is absurd because it is the communities that suffer the consequences when environmental and social impacts occur.</p>	
<p><b>12 Lack of adequate information on the project benefits to the host communities and Bunyoro Kingdom:</b> The report indicates that the project will generate revenues for the government but it does not show how the host communities and Bunyoro Kingdom, the biggest land owner in the project area, who will be directly affected in terms of land displacements, impact on fishing rights, grazing, agriculture and others will benefit from the project.</p> <p>Any project that does not have a framework to ensure that host communities and cultural institutions such as Bunyoro Kingdom get direct benefits from the project as a reward for the sacrifices they make may run into problems. It may never get social capital from the communities and may suffer insecurity.</p>	<p>The developer should carry out more research and provide a detailed analysis on the economic and social benefits of the Kingfisher oil project to host communities, especially fishing communities and others living in the Buhuka flats and to Bunyoro Kingdom. A project that does not guarantee clear benefits to host communities cannot succeed because there will be hostilities such as those that are seen in the Niger Delta in Nigeria.</p>	
<p><b>13 The Terms of Reference (ToRs) and the ESIA study were based on outdated environmental laws and regulations:</b> The ESIA was based on only the EIA regulations of 1998 and the National Environmental Management Act 1995. This is according to page 3 of the ESIA report. The above laws do not provide for the conduct and assessment of social impacts of the projects in Uganda. This is perhaps why NEMA is inviting the public to review and comment on the ESIA report at a time when CNOOC is about to complete the implementation of the Kingfisher oil project ESIA RAPs. This is a big contradiction and unfortunate because RAPs should be conducted and implemented as part of ESIA.</p>	<p>NEMA should not approve the Kingfisher ESIA until the draft ESIA regulations are completed, operationalized and aligned with the new 2019 National Environmental Act. Rushing decisions for oil exploitation without a strong legal framework and mechanism for compliance is dangerous and should be avoided at all costs.</p>	
<p><b>14 Lack of information about hazardous waste disposal including the cost implications:</b> The ESIA report discusses the substantial amounts of hazardous waste that will be associated with construction and operation of the project.</p>	<p>NEMA should not approve the ESIA report because it lacks a clear management plan for disposing of hazardous waste. What happens if the independent contractors</p>	

	<p>In the ESIA, CNOOC has not identified the location where this hazardous waste would be disposed of however. The ESIA merely states on page 8-86 that:          “All ... hazardous waste generated at the CPF and on the well pads will be collected and disposed of by hazardous waste contractors at a certified hazardous waste disposal site.”</p>	<p>licensed by NEMA fail to handle hazardous wastes in a manner that protects the environment and people from danger? The ESIA also does not provide information regarding what would happen if an accident happened outside the waste plants. What is the plan for managing such accidents?</p>
--	--	--

### C. CONCLUSION

In conclusion, we recognise the developer’s efforts and commitment to promote the sustainability of Lake Albert and its surroundings using advanced Horizontal Drilling Technology (HDT). However, the current ESIA report contains huge weakness and gaps for NEMA to rely on and make a well balanced decision for the conservation of the environment and people amidst oil dangers. Moreover, the ESIA report is incomplete as it lacks the relevant RAPs on land acquisition and resettlement. We therefore implore NEMA not to rely on such an incomplete report. Further, the ToR for the Kingfisher study were based on the 1995 National Environment Act and the 1998 EIA Regulations which did not provide for assessment of social impacts. However, the approval or non-approval of the ESIA will be based on the 2019 National Environmental Act without up-to-date relevant ESIA regulations. We ask NEMA not to consider the ESIA report for the Kingfisher project until all the relevant laws are put in place and the developer compiles and submits an adequate ESIA report.






Thank you



Signed by:


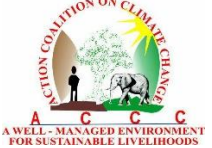


Dickens Kamugisha  
 CEO, AFIEGO

**Signatories:**

No.	Institution	Logo
1.	Africa Institute for Energy Governance (AFIEGO)	
2.	National Association of Professional Environmentalists (NAPE)	
3.	Environmental Conservation Trust (ECOTRUST)	
4.	World Voices Uganda; Publish What You Pay (PWYP)	
5.	Citizens Concern Africa (CICOA)	

6.	Guild Presidents Forum on Governance (GPFOG)	 The logo for the Guild Presidents Forum on Governance (GPFOG) features a stylized blue and green swoosh above the acronym "GPFOG" in green capital letters.
7.	Centre for Constitutional Governance (CCG)	 The logo for the Centre for Constitutional Governance (CCG) is a circular emblem with a red border. Inside, the text "CENTRE FOR CONSTITUTIONAL" is at the top and "GOVERNANCE" is at the bottom. In the center, the letters "CCG" are displayed in red on a white background.

8.	South Western Institute for Policy and Advocacy (SOWIPA)	
9.	Action Coalition on Climate Change (ACCC)	
10.	Girl Power Foundation, Kasese	
11.	Green Organisation Africa (GOA)	
12.	Oil Refinery Residents Association (ORRA)	
13.	Coalition of Kasese women and youth clean energy clubs	
14.	Kasese CSO Consortium on Climate Change Adaptation and Biodiversity Conservation	

15.	Centre for Energy Governance and Development	
-----	--	--