

WEAKNESSES/GAPS AND RECOMMENDATIONS ON THE ESIA EACOP REPORT DATED JANUARY 2019

INTRODUCTION

Following the compilation and submission of the Environmental and Social Impact Assessment (ESIA) report for the East African Crude Oil Pipeline (EACOP) project, NEMA invited the public to make written comments on the Environmental and Social Impact Assessment (ESIA) report for the East African Crude Oil Pipeline (EACOP) project On July 23, 2019. NEMA extended the deadline for receiving comments from the public from August 30, 2019 to September 15, 2019.

The invitation to the public to make comments regarding the EACCOP ESIA report was made in line with Regulations 19 and 20 of the 1998 Environmental Impact Assessment (EIA) Regulations. After receipt of the comments, PAU and NEMA will organize public hearings on the ESIA. NEMA is mandated to organize the public hearings as under regulation 21(2) of the 1998 EIA Regulations, projects of a transboundary nature such as the EACOP must be subjected to public hearings.

Therefore in relation to the above, as a concerned citizen along the EACOP pipeline, I wish to make the following observations, concerns and offer recommendations of which if not addressed, the proposed ESIA EACOP report and associated oil activities will not protect the environment and improve livelihoods.

	Weaknesses/GAPS identified in the ESIA report	Proposed Recommendations
1.	The ESIA EACOP report makes wrong assessment of the impact of climate change and pollution levels. The nature of Uganda's crude oil is waxy which will require heating to be able to be transported from Hoima to Tanga in Tanzania waxy variety of crude oil that solidifies at ambient temperatures and must be heated to at least 50o C throughout the 1443-km length of the pipeline to arrive at Tanga for i export which will increase pollution levels, environmental impacts and thus climate	Nema should first undertake an assessment of the impact of indirect emissions will have on climate change which the current EACOP ESIA report undermines in its current form.

	<p>change.</p> <p>This ESIA confines its assessment to only the operational emissions of CO₂ and direct operational emissions in Uganda to be average between 11–18 ktCO₂ which represents around 0.014–0.029% of Uganda’s total GHG emissions. The contribution of EACOP to national emissions is only limited to operational carbon emissions while neglecting indirect total emissions that will increase the global carbon emissions.</p>	
2.	<p>The proposed economic benefits and expected jobs from the EACOP project are exaggerated and unrealistic</p> <p>The EACOP ESIA report raises high expectations of citizens with respect to jobs and other economic benefits, based on the provided information in the ESIA report; it lacks reasoning and justification of jobs and economic Unjustified expectations of jobs and economic benefits.</p> <p>This sector requires highly trained and skilled people yet these are currently lacking with no construction, engineering skills meaning that the local people will not benefit from expected EACOP employment opportunities</p>	<p>Put in place an affirmative action for local employment. For the local people to get jobs, I recommend that for this to happen, there is need for an affirmative action where directly affected/host communities should be given a certain portion of the jobs opportunities and NEMA should ask the developer to manage people’s expectations by telling them what is feasible and what is not as majority of our people seems to be eager waiting for the jobs and abandoning agriculture which is the most important economic activities in our area</p>
3	<p>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.</p> <p>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</p>	<p>NEMA should halt the approval process and demand that the developer to incorporate Polyurethane foam insulating technology and reduce the heating points from the current 35 to 4 on the Ugandan side. This will reduce the impacts on the environment and surrounding communities who will be affected by the project.</p>

	<p>distance 35 will be located in 296 km pipeline in the Ugandan side while only 2 will be in 1,149 Km distance at the Tanzanian Side.</p> <p>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 Uganda side hence requiring 35 heating points which maximizes environmental impacts and social impacts on the pipeline route.</p> <p>The purpose of the ESIA is to help us choose the best technology and mitigation measures that address the impacts.</p>	
4	<p>Lacks mitigation measures for critical and endangered ecosystems</p> <p>The ESIA report recognizes that the pipeline will impact some of the critical ecosystems such as The Wambabya and Taala Forest Reserve. In addition some ecosystems such as Guineo Congolian semi-evergreen forest and riverine and swamp forest (wetland forests) which are listed as vulnerable while others as critically endangered by IUCN red list will be affected.</p> <p>Amidst the recognition of their importance and vulnerability, the ESIA report did not proposed mitigation measures for the conservation of such ecosystems but instead proposed further furthers which should have been covered in the ESIA report.</p>	<p>The ESIA in its current form does not provide sufficient information on the critical and endangered ecosystem that will be impacted by the project. The information is insufficient to enable effective decision-making.</p> <p>NEMA should request the developer to carry all the further assessments on these ecosystems as required by the ESIA before the project is approved. The studies should cover other specifics including Bohor reedbeek, African golden cat, hippopotamus and spot-necked otter which are directly affected by the project in Wambabya and Bugoma Forest Reserves.</p>
5	<p>Impacts of digging trenches on rivers crossed by the pipelines</p> <p>In the ESIA report, the pipeline will pass through rivers, swamps, wetlands and other</p>	<p>NEMA should demand for additional information on the size of digging trenches on rivers, swamps and wetlands for the pipeline to cross and potential impacts of such activities on the</p>

	<p>water ecosystems where digging of trenches is proposed as mitigation measure. However, the ESIA report has not indicated what the depth, width of the trenches that will be dug and what impacts it could cause on the water system. This is in terms of destabilizing the water flow, contamination and mitigation measures as this could affect the communities depending on these water bodies downstream.</p>	<p>water flow system and such information should be included in the ESIA report. The current ESIA report is silent about these impacts</p>
<p>6</p>	<p>Failure to identify and address trans boundary impacts</p> <p>The ESIA report indicates that the EACOP pipeline will cross several rich biodiversity systems while running from the oil field in Hoima to Tanga port in Tanzania exporting crude. The pipeline will cross rivers and wetlands belonging to shared resources such as Lake Albert, Victoria Nile and Lake Victoria.</p> <p>Lake Albert is shared between Uganda and the DRC while River Nile is shared with eleven countries including South Sudan, Sudan, Egypt and others. Several countries including Sudan and Egypt primarily rely on the river to provide fresh water. On the other hand, Lake Victoria is shared between Uganda, Kenya and Tanzania. Any impact such as oil spills from the pipeline could affect nationals in the above countries.</p> <p>However, the ESIA report does not identify any possible trans boundary impacts that might be generated by the pipeline.</p> <p>Even if the most advanced technology is used in the construction of an oil pipeline, potential impacts are sometime generated, for instance, countries like Nigeria, Mexico, and USA have experienced oil spills, which have created impacts beyond their own borders, and Uganda is not exceptional.</p>	<p>The ESIA report approval should be halted until key information regarding the trans boundary impacts are addressed. This includes the impacts that may be generated in Uganda and affect communities in the Tanzanian side and vice versa. In addition, the residual impacts of the project should have clear mitigation measures indicating how they will be addressed.</p>

	<p>Further, the ESIA report points out that during transportation of crude oil, some residual impacts may remain but have been graded as not significant meaning no further action may be undertaken to mitigate them.</p> <p>It should be noted that impacts arising from project such as oil are volatile and could have social and environmental impacts.</p>	
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Conclusion

Although oil activities are expected to bring some benefits, these will depend on how we strive to promote and protect our environment .I therefore recommend NEMA to halt the EACOP ESIA report because the report does not safe guard our environment and community livelihoods. The approval of EACOP ESIA report without addressing the above identified gaps, Uganda risks facing huge environmental impacts and turn out to be a curse rather a blessing.

Thank you

Dan Denis Agaba

Resource Economist and Concerned citizen

Email:dandenisagaba@gmail.com