WOMEN & YOUTH FOR CLEAN ENERGY MINISTRY OF ENERGY AND MINERAL DEVELOPMENT/May/2025

To: Hon. Ruth Nankabirwa, The Minister, Ministry of Energy and Mineral Development (MEMD), Kampala (U),

Dear Hon. Minister,

RE: REQUEST TO ADDRESS WEAKENESSES IN UGANDA'S ENERGY TRANSITION PLAN

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N 6 MAY 2025

SURITY RUGISTRY

We, the undersigned women and youth from Uganda, extend warm greetings to you and the staff of the MEMD.

We acknowledge and appreciate efforts made by the MEMD to promote a transition to modern energy for Ugandans through the country's Energy Transition Plan (ETP). The plan, which you launched at COP 28 in Dubai in December 2023, is central to efforts to promote modern energy access for all Ugandans by 2050

We commend you and officials at MEMD for working alongside the International Energy Agency (IEA) to put the plan in place.

In addition, we commend you and the MEMD for, through the ETP, recognizing off-grid electrification as the most feasible path to ensuring that majority of Ugandans gain access to clean energy by 2030.

Available information from the Uganda Bureau of Statistics (UBOS) shows that off-grid solar, which stood at 38% in 2019/20201, was the most used form of power in Uganda. The percentage of female-headed households that were using off-grid solar including solar home systems and solar kits was 32.1% in 2019/2020. This underscores the need to promote off-grid electrification if women, who suffer more energy poverty than men, are to gain access to power.

In addition to the above, we commend the MEMD for identifying the need to put in place strong policies, laws and regulations to attain universal clean energy access in Uganda. The fact that the ETP is also placing emphasis on increasing access to clean cooking while recognizing that targets related to clean cooking may be tough to achieve as they have not been seen anywhere on the

¹ Uganda Bureau of Statistics; Uganda National Household Survey Report 2019/2020: https://www.ubos.org/wpcontent/uploads/publications/09_2021Uganda-National-Survey-Report-2019-2020.pdf

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In addition to the above, we commend the MEMD for identifying the need to put in place strong policies, laws and regulations to attain universal clean energy access in Uganda. The fact that the ETP is also placing emphasis on increasing access to clean cooking while recognizing that targets related to clean cooking may be tough to achieve as they have not been seen anywhere on the African continent is commendable. Recognizing that certain targets may be hard to achieve is important as efforts will be made to devise means to attain the targets.

1. WEAKNESSES OR GAPS IN THE ETP

While the ETP possesses certain strengths, it also has weaknesses or gaps that we are inviting the MEMD to address. Some of these include:

(a) Lack of gender and youth targets: The ETP sets targets related to promoting universal access to clean energy. For instance, the plan seeks to ensure that 45% of the population has access to grid power by 2030, while it is hoped that the rest of the population will meet their modern energy needs through access to mini-grids, solar home systems (SHs) and transitional multi-light systems (small solar systems).

The ETP further observes that by 2050, more than 90% of the population is expected to have access to electricity with this access being attained either via the main grid (82%) or a mini-grid (10%). The ETP further observes that the remaining most remote 10% are expected to gain access to clean energy through larger SHSs.

While population-wide targets are set in the ETP, gender and youth targets are not. This makes the ETP gender- and inclusiveness-blind to a certain extent. Women and youth often suffer from more economic poverty than their male peers. This undermines their capacity to access clean energy.

The ETP therefore needs a gender- and inclusiveness analysis that recommends how factors that undermine women and youth's access to clean energy are to be addressed.

(b) Clean cooking targets are gender blind: When it comes to clean cooking, the ETP notes that 6% of the population needs to gain access to clean cooking every year if clean cooking targets are to be attained. The targets are as follows: by 2030, about 40% of the population is expected to gain access to clean cooking through Improved Cookstoves (ICS), while over 33% are expected to gain access through Liquefied Petroleum Gas (LPG). In addition, over 15% and 10% of the population are expected to gain access to clean cooking via electricity and biogas or bioethanol respectively. While the above targets are set, they are gender- and inclusiveness-blind, which could undermine women and youth's access to clean cooking solutions.

¹ Uganda Bureau of Statistics; *Uganda National Household Survey Report 2019/2020*: <u>https://www.ubos.org/wp-content/uploads/publications/09_2021Uganda-National-Survey-Report-2019-2020.pdf</u>

- (c) Gas for cooking will worsen the climate crisis: In addition, the ETP observes that gas is one of the fuels that will drive 'clean' cooking in Uganda. As discussed above, government set targets such as seeing over 33% of the population gaining access to clean cooking by 2030 through access to gas. The gas is expected to be acquired from Uganda and Tanzania. While proponents of gas argue that it is a clean fuel, climate science shows that it is not. Available information shows that LPG, which contains propane and butane, can worsen global warming. This is because improper combustion of LPG can result in the release of carbon and methane emissions, thereby worsening climate change. Women and youth are some of the most vulnerable populations to climate change, and need to be protected from the vagaries of the climate crisis through the promotion of clean cooking fuels.
- (d) Use of coal, oil and gas for industrial processes will also worsen the climate crisis: Further, the ETP observes that industry will be the main driver of Uganda's energy demand growth in the coming years. The industries that will drive the increase in energy use include light industries such as food production, machinery, textiles, timber, as well as construction and mining. Energy intensive industries such as cement and steel production are also expected to drive up energy demand.

While the ETP envisions that electricity will be the fastest growing fuel that will drive Uganda's industrialization, we are concerned that per the ETP, in the medium term, fossil fuel use will expand, especially in heavy industries. By 2030, its share in the overall industry fuel mix is expected to more than double to 30%.

The use of oil and coal in industry is expected to plateau around 2035 but natural gas consumption is expected to increase. Natural gas growth is expected to increase through 2050 in industry, overtaking oil consumption.

The planned introduction of coal in Uganda's industrial processes is concerning, so are plans to rely on oil and gas to power industrial processes. The three fossil fuels are the biggest drivers of climate change, with available information showing that the fuels account for around 75% of greenhouse gases (GHG).

(e) Oil refinery and petrochemical industry's use of fossil fuels is problematic: In addition, industrial processes in the oil refining and petrochemical sectors are expected to contribute to Uganda's increasing reliance on fossil fuels. Per the ETP, Uganda's new oil production and refining operations will create a jump in energy demand when they come online. Some of this energy will be electric, as is the case with heating pipes, pumps and compressors, and some refining operations. However, some refinery operations will rely on burning various by-products to power the refining processes in auxiliary units.

The ETP further observes that petrochemical production is expected to be developed alongside the refinery, and will make use of the chemical by-products. The petrochemical operations will also rely on natural gas from Tanzania. In total, the sector's energy consumption is expected to reach around 4% of industrial energy demand by 2050.

We cannot overstate the fact that reliance on fossil fuels is bad for women, youth and Uganda's main economic activities such as agriculture, fisheries, tourism, business and others that were identified in Uganda's Updated Nationally Determined Contributions (NDCs) of 2022 as being some of the most vulnerable to climate change. The abovementioned sectors employ the majority of the female and youth working population in Uganda and need to be protected from the vagaries of climate change.

- (f) Plans to promote an energy transition based on fossil fuels is a challenge: While a clean energy transition is crucial to addressing the climate crisis, we are concerned that government efforts to promote an energy transition will partly rely on fossil fuels. Per the ETP, the production of energy transition minerals is expected to contribute to the use of fossil fuels in the industry sector. It is unconscionable that Uganda plans to rely on fossil fuels, which drive climate change, to drive energy transition efforts. Worth noting is that Uganda loses up to USD 5.9 billion (UGX 21.5 trillion) per year due to climate change impacts with losses in agriculture, water, energy and infrastructure being experienced.
- (g) Hon. Minister, we are also concerned that Uganda plans to lag behind when it comes to transitioning the transport sector. Per the ETP, energy demand in the transport sector is expected to grow by 50% by 2030. This demand is expected to be met with oil products. The share of electricity demand in the transport sector is expected to be a dismal 3% in 2030 and only 20% in 2050.

2. REQUESTS

The ETP should not be a fossil fuel plan. It needs to be reformed. We therefore invite the MEMD to do the following:

- (i) The MEMD should reform the ETP to place emphasis on the use of renewable energy as driver of clean cooking, transport and industrialization, as opposed to placing emphasis on coal, oil and gas as a driver of the above.
- (ii) The MEMD should integrate gender and youth considerations into Uganda's ETP. Without addressing gender and youth vis-à-vis energy poverty concerns, the ETP's targets may not be achieved.
- (iii) Further, the MEMD should urgently put in place policies such as a Solar Energy Policy to address policy gaps that could undermine a clean energy transition.
- (iv) In addition, the MEMD should engage cabinet to table the Consumer Protection and Management Bill before parliament for debate and enactment. The law is needed to address challenges related to sub-standard off-grid products that undermine off-grid electrification.
- (v) Furthermore, the MEMD should work with relevant partners to address existing electricity sector challenges such as weak grid infrastructure, frequent power outages, slow expansion to rural areas and others. This is because under goal 1 of the ETP, the MEMD is seeking to connect 45% of the population to the grid by 2030 and more than 90% to the main and mini grids by 2050.
- (vi) The MEMD should also provide subsidies for off-grid options especially in the solar sector to address the high initial set-up costs which limit individual purchases.
- (vii) Finally, the MEMD should establish youth and women advisory boards in the ministry to ensure that Uganda's ETP reflects the needs of women and youth.

SIGNATORIES

No.	Name	Sex	District
1.	Gerald Barekye	М	Kampala
2.	Ason Natuyamba	М	Kampala
3.	Andrew Arijuka	М	Ntungamo
4.	Stephen Ahereza	М	Ntungamo
5.	Olive Atuhaire	F	Kampala
6.	Shakirah Natamba	F	Mitooma
7.	Elastus Arinaitwe	М	Rwampara
8.	Glorious Gift Musoki	F	Kasese
9.	Charity Arineitwe	F	Kabale
10.	Ahmed Mansul Sserunjogi	М	Kampala
11.	Daniel Tumushime	М	Kampala
12.	Victor Manzi	М	Mitooma
13.	Trevis Muhwezi Mutatiina	М	Mitooma
14.	Christopher Opio	М	Hoima
15.	Oil Refinery Residents Association	F	Hoima
15.	Ndyamwesiga Desire	М	Kampala
16.	Mercy Jovia Alowo	F	Kampala
17.	Aryampa Brighton	М	Wakiso
18.	Regarn Agaba	М	Sheema
19.	Mariam Nsumba	F	Kampala
20.	Oroma eric	М	Kiryandongo
21.	Joshua Atwebembere	М	Kampala
22.	Kevin Rutebemberwa	М	Kampala
23.	Tracy Theresa Mbabazi	F	Mukono
24.	Gideon Uwayisenga	М	Luweero
25.	Brian Wasswa	М	Nakaseke
26.	Caroline Kinkuhaire	F	Wakiso
27.	Stephen Okwai	М	Hoima
28.	Brian Patrick Mulondo	М	Wakiso (Entebbe)
29.	Bedan Ssekandi	М	Kampala
30.	Cyprian Kawuzi	М	Jinja
31.	Muwonge John Bosco	Male	Rakai
32.	Maria Nansukusa	F	Wakiso
33.	Abel Lemi	М	Buikwe
34.	Nakandi Bitamisi	F	Busia
35.	Nicholas kiggundu	М	Nakasongola
36.	Emmanuel Ongyeer	М	Hoima
37.	Achilles Twikirize	М	Masindi
38.	Desire Akatukunda	F	Kampala
39.	Kagoya Sumin Babirye	F	Bugiri

40.	Immaculate Nakanjakko	F	Kampala
41.	Comfort Tusingwire	М	Kotido
42.	Caroline kinkuhaire	F	Najjera
43.	Moses Baluku	М	Kasese
44.	Martha Amviko	F	Mukono
45.	Kaye Yuda Thadeo	М	Kampala
46.	Ronlad Ashaba	М	Luwero
47.	Ashim Batya	М	Kapchorwa
48.	Pius Onesmus	М	Ntungamo
49.	Vivian Ainembabazi	F	Kampala
50.	Prudence Tusingwire	F	Wakiso
51.	Priscilla Mutuzo	F	Mbarara
52.	Ashley Katumwesigye	F	Kikuube
53.	Doreen Nabukeera	F	Wakiso
54.	Arnold Ainomugisha	М	Kabale
55.	Ron Ainebyoona	М	Mbarara
56.	Lauryn Ahaisibwe	F	Wakiso
57.	Rachael Amongin	F	Serere
58.	Elizabeth Nabimanya	F	Kampala
59.	Hildah Nsimiire	F	Wakiso
60.	Mercy Nuwamanya	F	Kampala
61.	Doreen Namara	F	Kampala
62.	David Lumu	М	Kampala
63.	Ritah Nakyobe	F	Kampala
64.	Arthur Mukembo	М	Kampala
65.	Benjalina Namazzi	F	Kampala
66.	Sheba	F	Kampala
67.	Vivian Namaganda	F	Mpigi
68.	Jane Apio	F	Wakiso
69.	Serina Kirabo	F	Wakiso
70.	Kaye Yuda Thadeo	М	Kampala
71.	Ivan Elvis Sanya	М	Kampala
72.	Joan Atuha	F	Buhweju
73.	Vanesssa Sarah Nabachwa	F	Wakiso
74.	Maureen Nakiganda	F	Wakiso
75.	Anne Nabbowa	F	Kampala
76.	Doreen Kobusingye	F	Wakiso
77.	Phionah Ndyamuhaki	F	Wakiso
78.	Wilbroad Tindimwebwa	М	Kampala
79.	Liniex Atwongyeire	М	Ntungamo
80.	Jesca Kisaakye	F	Wakiso
81.	Ambrose Andihihi	М	Rukiga
82.	Mashud Mugisa	М	Kabarole

83.	Proscovia Niwandinda	F	Wakiso
84.	Alison Desire Naikoba	F	Wakiso
85.	Immaculate Mbabazi	F	Kabale
86.	Doreen Ansinguza	F	Kampala
87.	Shillah Agaba	F	Mbarara
88.	Kenneth Nuwenyine	Μ	Kazo district
89.	Lois sabila Chepkurui Lois	F	Hoima
90.	Miriam Namiganda	F	Butambala
91.	Martha Owembabazi	F	Kampala
92.	Abikora Mwesiga	Μ	Mitooma
93.	Britah Birungi	F	Kampala
94.	Edith Kyomugisha	F	Isingiro
95.	Deogracious Akatwijuka	Μ	Kabale
96.	Joan Eyudu Ajuro	F	Kampala
97.	Ayebaziibwe Evalyne	F	Kampala
98.	Jeansbell Ainembabazi	F	Kampala
99.	Doreen Ashaba	F	Kampala
100.	Racheal Asingwire	F	Kampala
101.	Cirrus Kabaale	Μ	Hoima
102.	Josephine Nabbosa	F	Kampala
103.	Charity Kyasiimire	F	Kampala
104.	Joannah Cheptoyek	F	Kampala
105.	Simon Peter Tumusiime	Μ	Kampala
106.	Birghton Ahumuza	Μ	Rukungiri
107.	Honey Owaribo Opion	Μ	Abim district
108.	Sarah Kihembo	F	Masindi
109.	Jovia Racheal Bugonzi	F	Kampala
110.	Miracle Pawere	F	Kampala
111.	Edmond Bradely Ogwal	Μ	Gulu
112.	Damali Atukunda	F	Sheema
113.	Druscilla Kamushabe	F	Kampala
114.	Augustine Zziwa	Μ	Entebbe
115.	Dalphine	F	Kampala
116.	Derrick Ingoyi Gidongo	Μ	Bulambuli
117.	Ritah Akankwasa	F	Kampala
118.	Sarah Natukunda	F	Hoima
119.	Miria Musiimenta	F	Hoima
120.	Peninah Ruhindi	F	Hoima
121.	Mary Mugisha	F	Hoima
122.	Gloria Twikirikize	F	Hoima

123.	Fiona Alinda	F	Hoima
124.	WellenAliganyira	М	Hoima
125.	Joyce Kyaliisma	F	Hoima
126.	Scovia Kyomuhendo	F	Hoima
127.	Millius Nyamahunge	F	Hoima
128.	Hope Alinaitwe	F	Hoima
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129.	Roza Bagerusa	F	Hoima
130.	Ketty Esiteria	F	Hoima
131.	Rozet Asiimwe	F	Hoima
132.	Patience Nahabona	F	Hoima
133.	Justina Busingye	F	Hoima
134.	Samuel Abedlembe	М	Hoima
135.	Jackline Nyakwezi	F	Hoima
136.	FaustaTumuhiirwe	F	Hoima
137.	Flavia Kyamulesire	F	Kikuube
138.	Evelyne Birungi	F	Kikuube
139.	Peninah Muhairwe	F	Kikuube
140.	Alice Bachondooza	F	Kikuube
141.	Stella Akugizibwe	F	Kikuube
142.	Saidat Kunihira	F	Kikuube
143.	Jackline Ayebaale	F	Kikuube
144.	Janepher Tibaleka	F	Kikuube
145.	Oliver Kaahwa	F	Kikuube
146.	Mastura Nambi	F	Kikuube
147.	Rosemary Ayesiga	F	Kikuube
148.	Harriet Mbabazi	F	Kikuube
149.	Margret Katusabe	F	Kikuube
150.	Hajira Kyomukama	F	Kikuube
151.	Lamula Asasira	F	Kikuube
152.	Clinton Bikwora	М	Kikuube
153.	Isaac Mwesige	Μ	Kikuube
154.	Pius Twesigomwe	М	Kikuube
155.	Zulia Tugume	F	Kikuube
156	Shakira Kabajurizi	F	Kikuube
157.	Micheal Mbabazi	М	Kikuube
158.	Amiina Karungi	F	Kikuube
159.	John Tinkamanyire	М	Kikuube
160.	Chrispus Tumwesige	Μ	Buliisa

161.	John Kusiima	М	Buliisa
162.	Immaculate Ayesiga	F	Buliisa
163.	Mergen Ahumuza	F	Buliisa
164.	Marvini Muganyizi	M	Buliisa
165.	Brenda Atuhairwe	F	Buliisa
166.	Sifa Agondeza	F	Buliisa
167.	Nasah Tumweze	F	Buliisa
168.	Saffic Alinaitwe	M	Buliisa
169.	Oliver Nyakato	F	Buliisa
170.	Slyvia Kabonesa	F	Buliisa
171.	Beatrice Nyamahunge	F	Buliisa
172.	Pamella Tumusiime	F	Buliisa
173.	Joy Alinaitwe	F	Buliisa
174.	Monica Nyangoma	F	Buliisa
175.	Rose Alinaitwe	F	Buliisa
176.	Evelyne Katusabe	F	Buliisa
177.	Dorothy Mbabazi	F	Buliisa
178.	Pitiyendi Mugisha	F	Buliisa
179.	Serinah Kamanyire	F	Buliisa
180.	Willy Tumweze	M	Buliisa
181.	Martin Ankunda	M	Kakumiro
182.	Sheila Kukunda	F	Kakumiro
183.	Agatha Rimubyona	F	Kakumiro
184.	Ambrose Kisembo	М	Kakumiro
185.	Roset Niwamanya	F	Kakumiro
186.	Adam Asaba	М	Kakumiro
187.	Robert Musinguguzi	М	Kakumiro
188.	Innocent Agaba	М	Kakumiro
189.	Rachael Musiimenta	F	Kakumiro
190.	Rose Turyahebwa	F	Kakumiro
191.	Adreen Twikirize	F	Kakumiro
192.	Alice Kemizano	F	Kakumiro
193.	Agnes Nanyonyi	F	Kakumiro
194.	Fldrenge Tumukunde	F	Kakumiro
195.	Edwin Tumwebaze	F	Kakumiro
196.	Colodina Ainembabazi	F	Kakumiro
197.	Inidi Nakato	F	Kakumiro
198	Aisha Ntegyereize	F	Kakumiro
199.	Mary Nakagira	F	Kakumiro
200.	Florence Namugambe	F	Kakumiro
201.	Edisa Twikirize	F	Kakumiro
202.	Joy Kyosimire	F	Kakumiro
203.	Annet Kyensi	F	Kakumiro
204.	Betty Tukwasibwe	F	Kakumiro
205.	Jacent Mugyisha	F	Kakumiro

206.	Edurida Kibetenga	F	Kakumiro
207.	Esther Nakalema	F	Kakumiro
208.	Antonina Nakate	F	Kakumiro
209.	Grace Namara	F	Kakumiro
210.	Roset Ninsiima	F	Kakumiro
211.	Chris Mary Kyalisiima	F	Kakumiro