

June 2025; Issue 6

CRITICAL MINERALS: KEY THINGS GOV'T MUST TAKE INTO ACCOUNT WHILE DEVELOPING THE SECTOR



A photo of an artisanal miner at work
Photo credit: *The Independent*

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- Critical minerals: Dos and don'ts for the Ugandan government
- Pictorial of our activities
- Lobbying
- In the media
- Upcoming events

Dear reader, welcome to AFIEGO's June 2025 newsletter.

This month (June 2025), the Ugandan President, Yoweri Kaguta Museveni, officially **inaugurated** the Uganda National Mining Company (UNMC).

The company "was **established** to manage Uganda's commercial holding and participation in the mineral industry" at local and international levels.

The company was launched at a time when there is immense global interest in critical minerals, which are deemed essential for the clean energy transition as well as militarisation and digitalisation efforts.

These minerals **range** from lithium to nickel to cobalt. Others include copper, graphite, rare earth elements (REE), manganese, aluminum, chromium and others.

The minerals are needed to **manufacture** technologies such as solar panels, wind turbines, electric vehicles and battery storage, electricity transmission lines and other technologies needed to wean the world off fossil fuels such as coal, oil and gas to address climate change concerns.

So important are critical minerals that several countries have put in place laws or struck partnerships

to secure their supply. To this end, the European Union (EU), a block of 27 countries, put in place the EU Critical Raw Materials Act.

The law came into **force** in May 2024 and is aimed at ensuring "EU **access** to a secure and sustainable supply of critical raw materials, enabling Europe to meet its 2030 climate and digital objectives."

In addition, **14** countries such as the United States (US), Japan, Norway, the Republic of Korea as well as others and the EU established the Minerals Security Partnership (MSP).

The purpose of the MSP is "to accelerate the development of diverse and sustainable critical energy minerals supply chains ... along the full clean energy value chain."

Critical raw materials are considered so essential that geopolitical tensions between China and the West have been further stocked because China has vast access to and is home to some of them.

Uganda is also home to key minerals. According to the "Status of Domestication of the Africa Mining Vision in Uganda" report, the country is endowed with over **50** different minerals and ranks among African countries with the most significant number of minerals. Not all the minerals in Uganda are

considered critical however. Those that are **include** copper, cobalt, lithium and chromite (from which chromium is extracted). Uganda is also a potential source for REE.

The minerals present in Uganda are of high or moderate importance to the **production** of clean energy technologies including solar PVs, wind turbines, electric vehicles and battery storage as well as electricity transmission lines.

Little wonder then that government has undertaken efforts such as seeking partnerships to reopen the Kilembe copper mines in Kasese district in Western Uganda as well as amending the Mining and Minerals Act, with an amended law being put in place in 2022. The law puts emphasis on value addition to ostensibly tap into the more valuable aspects of the minerals value chain.

Further, government holds and participates in symposia aimed at marketing Uganda's minerals.

Worth noting is that mining is one of the seven priority areas that government has identified under the National Development Plan (NDP) IV

that will be invested in to grow Uganda's economy tenfold by 2029/2030.

The production of critical and other minerals poses human rights, environmental degradation, and biodiversity conservation challenges.

In our **Word from CEO**, we discuss the challenges mining for critical raw materials poses for Uganda, and what government should do to avoid or minimise these challenges.

In this newsletter, we also bring you our **pictorial** section through which we share the activities that AFIEGO and our partners implemented this month (June 2025).

Further, in the **lobbying** section, we share some of the lobby and advocacy products that we produced and disseminated in June 2025.

Finally, in **in the media** section, we bring you some of the newspaper articles written by our staff and partners that were published in the leading newspapers in June 2025.

We hope that you will enjoy the newsletter.

Editorial team:

Diana Nabiruma

Patrick Edema

Vivian Ainembabazi

CRITICAL MINERALS: DOS AND DON'TS FOR UGANDAN GOVERNMENT

A small child in Kilembe in Kasese district in Western Uganda enjoys a cup of porridge.

His sister, who looks about ten years old, looks on.

The scene is like any that you would find in a Ugandan homestead: an elder sibling ensuring that their younger brother or sister gets nourished, while the mom is occupied with chores elsewhere.

Except this does not look like an ordinary scene to me. I watch the children after having read reports and policy briefs by Makerere University researchers that indicate that the water, agricultural soils, house dust and even toe nails of residents of Kilembe are **contaminated** with “high levels of metal concentration especially copper, cobalt, nickel, zinc, arsenic and lead”.

The contamination is as a result of the Kilembe mine activities of 1956 to 1982 which left 15 metric tonnes of mine tailings (waste from minerals) that were dumped into a river valley. This waste continues to pollute Kilembe today.

The contamination in Kilembe is also as a result of underground water and leachate (contaminated water) from the Kilembe mines; the above contain heavy metals.

The pollution affects the health of Kilembe residents with cancers, peptic ulcers, various types of gastritis, respiratory and other diseases being linked to the heavy metal pollution, per **studies** by Makerere University researchers.

Children and younger adults are said to be more vulnerable to the above diseases.

CRITICAL MINERALS

Amidst the above, Uganda is engaged in efforts to strengthen mining for critical minerals in the country. To this end, in May this year, the government officially handed over the assets of Kilembe Mines Limited to Sarrai Group, which had earlier been announced the winner of a long-drawn out bid to assume control of the copper and cobalt mines in Kasese.

As indicated in the editorial section of this newsletter, the Ugandan President, Yoweri Kaguta Museveni also **launched** the Uganda National Mining Company (UNMC) this month. Previously, key mining laws such as the Mining and Minerals Act were amended to ready the country for mining of critical raw and other minerals.

While critical minerals have been deemed necessary to drive the clean energy transition and address the climate crisis, it is imperative that the Ugandan government considers the following while encouraging participation in the critical minerals trade.

KEY CONSIDERATIONS

(a) Human rights concerns: The mining of critical minerals has the potential to result in human rights violations, and contribute to the resource curse, as seen in countries such as the Democratic Republic of Congo (DRC). With an estimated 3.6 million reserves of cobalt, the DRC is said to have the world's largest cobalt ore reserves.

These reserves account for **50%** of the world's reserves. The DRC also has huge
c o p p e r

reserves, with Uganda's neighbor being home to **8%** of the world's reserves. The mining of these and other minerals to drive the clean energy transition has however been **linked** to terrible working conditions, child labour, forced evictions and sexual assault.

The insecurity in the DRC is also linked with its minerals, with warlords seeking to take mineral-rich territories to accrue wealth for themselves. Neighbouring and other countries also encourage insecurity in the DRC with links being made between this insecurity and stealing of DR Congo's resources. Instead of benefitting from its mineral wealth, the majority of Congolese citizens suffer insecurity and human rights issues.

(b) Free, Prior and Informed Consent (FPIC) concerns: In addition, mining activities often take place on local communities' land. Available information shows that over **50%** of critical raw minerals projects are located in or near indigenous people's lands. Indigenous people are often marginalised and left out of decision making. In Uganda as well, mining often takes place among marginalised communities in rural areas. Such communities are often not allowed to exercise their right to say no to harmful projects.

Where extractive projects for instance oil and gas ones have occurred, local communities are often informed that an important resource is in their area, and it must be extracted, whatever the social, environmental and other impacts may be. This often leaves communities poorer, undermines social cohesion, and affects other aspects of living as

will be discussed later on in this article.

(c) Environmental concerns: The extraction of minerals can cause adverse effects on the environment and open up biodiverse protected areas that are key to addressing the climate crisis to mining. There have also been many documented instances of environmental pollution caused by mining operations, which are often caused by clearance of vegetation for mines, use of chemicals in mining, poor waste management and others.

For instance, lithium **mining** in Ghana has destroyed habitats, deprived communities and wildlife of fresh water, poisoned ecosystems and threatened species. Uganda's copper mining (1956-1982) activities also left a legacy of environmental damage, water pollution, soil contamination and others.

(d) Health impacts: The International Labour Organisation (ILO) notes that mining remains one of the most **hazardous** occupations in the world with workers in sector risking not only short-term injury and loss of life but also long-term impacts such as cancers and respiratory conditions. The above conditions impact not only household expenditure but also public expenditure on health. Yet is not only the workers that are affected.

Communities are too. As discussed prior in this story, communities living in Kilembe are predisposed to cancer as well as gastrointestinal and respiratory diseases due to soil, water and dust pollution from mining activities that took place between 1956 to 1982.

(e) Value addition: Government has undertaken key reforms, including amending and putting in place the Mining

and Minerals Act 2022, establishing the UNMC and banning the exportation of raw minerals from Uganda.

These reforms aim to promote value addition so as to retain more value (money) in Uganda. Indeed, available information shows that in the critical minerals value chain, processing and refining offer the most benefits for economic gain. While Uganda is keen on promoting value addition through refining, geopolitical muscling for critical minerals could see poorer countries such as Uganda being relegated to extraction processes only. The fact that artisanal and small scale (ASM) account for over **90%** of mineral production, and the sector remains largely informal while being under regulated, also undermines value addition.

RECOMMENDATIONS

Other challenges exist and to address them, the following should be done:

(i) Government should study countries that are suffering the resource curse characterised by insecurity, abuse of communities' rights, low value retention and others and avoid replicating the models in those countries.

(ii) Further, government must promote FPIC and respect communities' right to give or withhold consent for mining projects in line with the UN Declaration on the Rights of Indigenous Peoples. Government should also be transparent, sharing the true cost and disadvantages of mining projects, instead of exciting poor communities with promises of jobs so that they can accept what may turn out to be harmful projects.

(iii) In addition, mining corporations are pushing states to weaken environmental regulations to ostensibly support mining for critical raw minerals. The Ugandan government must reject these efforts and should enforce strong environmental laws to protect people and nature. Government must make sure that Strategic Environment Assessments (SEA) as well as Environmental and Social Impact Assessments (ESIAs) are undertaken for all mining projects to identify potential environmental impacts and develop Environment as well as Social Management Plans (ESMPs) to mitigate them.

(iv) Avoid repeat of oil sector mistakes: No mineral project should be allowed to take place at the expense of citizens and critical biodiversity. Already, thousands of Ugandans especially in the oil region have continued to suffer untold suffering including displacement, degradation of protected areas, increased animal-human conflicts and others because of oil activities. We call on the government to commit to avoid similar and or related impacts in the critical minerals sector.

(v) Finally, government should build alliances with other African countries that are involved in mining for critical minerals to set up value addition centres and strengthen bargaining power to capture some of the world market. Without building alliances to pool capital and build collective bargaining power, African nations such as Uganda are unlikely to retain adequate value from participation in the critical minerals trade.

By CEO

Pictorial of our activities

AFIEGO SENSITISES KYOTERA EACOP-AFFECTED COMMUNITIES TO PROMOTE ESIA COMPLIANCE



On May 30, 2025, AFIEGO organised a community sensitisation meeting on the EACOP Environmental and Social Impact Assessment (ESIA) compliance requirements during the construction phase.

The meeting took place in Kyotera district.

During the meeting, community members were trained on key environmental and social safeguards that the EACOP project developers must comply with during the construction phase.

AFIEGO also organised a meeting with EACOP-affected women to discuss the advocacy strategies that they can deploy to protect their rights.

AFIEGO HOLDS LITIGATION UPDATES MEETINGS WITH OIL-AFFECTED COMMUNITY MEMBERS IN BULIISA



On June 4, 2025, AFIEGO held community meetings with members of Environmental Conservation Agency Group (ECAG), Buliisa Patience Alliance Group (BUPAG), Buliisa Natural Climate Conservation Agency (BUNNCA), as well as women and youth.

The groups are made up of Tilenga oil project-affected community members.

The purpose of the meetings, which took place in Buliisa district, was to update community members, who filed compensation cases against government, on their court cases.

The meetings also discussed advocacy strategies that oil-affected members could deploy to protect their rights.

AFIEGO SUPPORTS PROJECT AFFECTED PERSONS TO ATTEND COURT CASE HEARING



On June 19, 2025, AFIEGO supported five Tilenga oil project affected persons from Buliisa district to attend a case hearing at the Hoima High Court.

The case arose from oil-induced land disputes, which saw some project-affected people's (PAPs) land being claimed by other parties.

AFIEGO provides legal support to oil-affected communities to defend their land and other rights. The case will next be heard at the Hoima High Court on August 27, 2025.

AFIEGO CONDUCTS RESEARCH ON TOURISM STAKEHOLDERS' PERCEPTIONS ON OIL AND GAS



Between February and June 2025, AFIEGO conducted research to document the perceptions and attitudes that tourism sector stakeholders in Uganda have towards the country's oil and gas industry.

Some oil and gas activities in Uganda are ongoing in national parks such as Murchison Falls. Queen Elizabeth National Park also remains under threat of oil exploration licensing.

In the research, AFIEGO documented not only what the tourism sector stakeholders' views of the oil and gas industry are, but also the impact that the industry has had on micro and small enterprises in oil host districts.

The research brief from the study will be disseminated in July 2025.

AFIEGO PARTICIPATES IN NATIONAL STAKEHOLDERS' DIALOGUE ON CONSERVATION OF CHIMPANZEES



On June 12, 2025, AFIEGO took part in the 6th national stakeholders' dialogue on the conservation of chimpanzees in Kampala.

The meeting discussed threats faced by chimpanzees, and how these can be addressed.

The meeting, which was organised by Cross Cultural Foundation Uganda (CCFU), also discussed the Uganda Wildlife Management Policy, which is under review.

AFIEGO and other stakeholders submitted proposals to influence the policy.

AFIEGO PARTICIPATES IN PARTNERS' GLOBAL REFLECTION MEETING IN BALI, INDONESIA



Between June 16 and 20, 2025, AFIEGO participated in a meeting for partners under the Global Alliance for Green and Gender Action (GAGGA) in Bali, Indonesia.

During the meeting, the partners discussed strengthening the collective power of civil society to promote gender and environmental justice as well as climate action.

In June 2025, AFIEGO and our IGEN-EA partners released a press statement analysing how Uganda's FY2025/2026 budget falls short on promoting green economic transformation.

In addition, we disseminated IEC materials to mark World Environment Day 2025. Additionally, we engaged the Appellate Division of the East African Court of Justice (EACJ) to expedite delivery of the ruling on a case seeking an injunction against the EACOP. This and other advocacy materials are captured below.



June 25, 2025

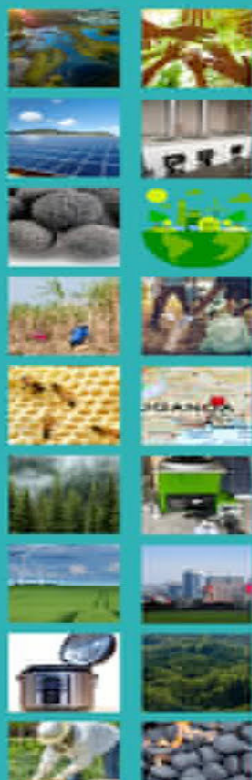
FOR IMMEDIATE RELEASE
KAMPALA

HOW UGANDA'S FY2025/26 BUDGET FALLS SHORT ON GREEN - ECONOMIC TRANSFORMATION

On June 12, 2025, Uganda joined three other East African countries in unveiling their national budgets. In presenting the UGX 72.37 trillion budget for the 2025/2026 financial year, Hon. Matia Kasaija, Uganda's Minister of Finance, Planning and Economic Development (MoFPED), highlighted priority areas including commercial agriculture, industrialisation, digital transformation, and market expansion.

For the Inclusive Green Economy Network-East Africa (IGEN-EA), our attention was drawn to whether the budget aligns with the country's green growth ambitions as outlined in the Uganda Green Growth Development Strategy (UGGDS) and the National Development Plan IV (NDP IV).

As a coalition of civil society and private sector actors, IGEN-EA commends the government's focus on commercial agriculture, which presents real potential for job creation, particularly for women and youth.



WORLD ENVIRONMENT DAY 2025

This **World Environment Day**, IGEN-EA calls on the Ugandan government to accelerate the adoption of clean energy technologies and support women and youth in forest host communities through clean energy entrepreneurship and beekeeping initiatives. These efforts are key to conserving our forests and building a greener, more resilient economy for all.

AFRICA INSTITUTE FOR ENERGY GOVERNANCE

The Registrar,
East African Court of Justice,
Appellate Division

Dear Sir/ Madam,

Re: Request for Expedited Delivery of Ruling – EACJ Miscellaneous Application Reference No. 39 of 2020; Centre for Food and Adequate Living Rights (CEFROHT), Africa Institute for Energy Governance (AFIEGO), Natural Justice Kenya, Centre for Strategic Litigation Limited vs. The Attorney General of the Republic of Uganda, The Attorney General of the United Republic of Tanzania, and The Secretary General of the East African Community

We write to you as the Africa Institute for Energy Governance (AFIEGO), one of the Applicants in the above-referenced matter currently pending before the Honourable Appellate Division of the East African Court of Justice.

This case, which was commenced on 6th November 2020, raises critical issues concerning the legality and environmental sustainability of the East African Crude Oil Pipeline (EACOP) project. As presented to the Court, we argue that the project violates several binding legal instruments, including the EAC Treaty, the Protocol for Sustainable Development of the Lake Victoria Basin, the Convention on Biological Diversity, the United Nations Framework Convention on Climate Change, and the African Charter on Human and Peoples' Rights, among others.

We recall that the matter was last heard on 24th February 2025 in Kigali, Rwanda, and the Court undertook to deliver its ruling on notice. However, three months have since passed, and we have not received any communication regarding the ruling or its expected delivery date.

Given the ongoing developments on the ground, including the continued implementation of the EACOP project, we are deeply concerned that the delay in rendering a decision may undermine the effectiveness of any eventual relief and contribute to continued harm against communities and the environment.

We, therefore, humbly appeal to the Honourable Court to prioritize the delivery of its ruling in this matter. Timely adjudication is essential not only for the protection of fundamental rights and natural resources but also for upholding public confidence in the East African Community's justice system.

4th June, 2025.



AFRICA INSTITUTE FOR ENERGY GOVERNANCE

June 4th, 2025.

The Chairperson
Judicial Service Commission
Kingdom Kampala
Uganda

Dear Sir,

RE: REQUEST FOR UPDATE AND EXPEDITED HANDLING OF COMPLAINT
AGAINST HIS LORDSHIP BYARUHANGA JESSE RUGYEMA

I write to you as one of the 21 advocates who, on December 18th, 2023, lodged a formal complaint with the Judicial Service Commission (JSC) against His Lordship Byaruhanga Jesse Rugemwa for alleged judicial misconduct, bias, incompetence, irregularities, and illegalities in the handling of High Court of Uganda at Hoima Miscellaneous Cause No. 24 of 2023; Attorney General vs. Kiseembo Rugadwa & 41 Others.

The gravity of the matter underpins our collective concern and demand for judicial accountability. The complaint arose from a series of disturbing events that unfolded in early December 2023, when the Attorney General filed a suit against 42 families affected by the Tilden Oil Project in Bulisla District, seeking to deposit disputed compensation sums in court, evict the families from their land, and obtain vacant possession essentially extinguishing any further governmental liability regarding the land.

Despite being a highly sensitive matter concerning vulnerable communities, the suit was rushed through court with what we believe was blatant disregard for due process and fair hearing rights. Notably:

- i. Between December 4th–8th, 2023, some of the affected persons were served with court documents. However, service was inconsistent, with many persons not served at all.
- ii. Even among those served, most are illiterate and could not understand the content of the documents. They were given less than 72 hours' notice before the hearing scheduled for December 8th, 2023.
- iii. At the hearing before His Lordship on December 8th, affected persons pleaded for an adjournment to secure legal representation and prepare a defense. This request was denied.
- iv. His Lordship proceeded to deliver a ruling the same day, granting all government prayers, resulting in the immediate eviction of families, confiscation of land, and deprivation of livelihoods.

(All the necessary details leading up to the complaint, were included in the formal complaint to your office)



In June 2025, AFIEGO staff and research associates wrote newspaper articles that were published in the leading newspapers. Some of the published articles are captured below.

The unveiled carbon markets regulations: How will local communities truly benefit

BY COLUMNIST — June 19, 2025 in CLIMATE ACTION REPORTS, Opinions

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Home > Opinions

Use part of the European Union-forest partnership funds to restore parts of Bugoma forest

BY COLUMNIST — June 11, 2025 in Opinions

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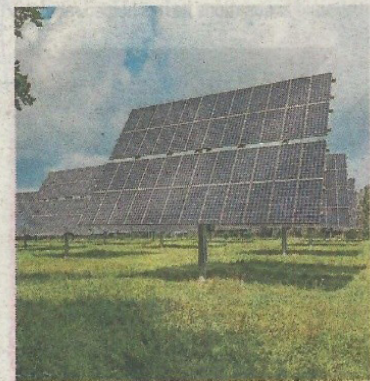


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Letters

LETTERS

Champion clean energy technologies awareness



Despite the abundant energy sources the country possesses, such as hydropower, biomass, solar energy, geothermal and wind, among others, Ugandans are still faced with a significant constraint on utilising them both, on and off-grid.

According to the Ministry of Energy and Mineral Development, it is noted that most Ugandans are heavily depending on biomass for cooking, mainly firewood and followed by charcoal, where only 15 percent of Uganda's population has access to clean cooking technologies and over 90 percent of the population relies on biomass fuel, largely charcoal and firewood that has been harvested from national forests.

This is partly caused by many factors including the unreliable power, unaffordability, limited trainings and platforms where people, especially the vulnerable can be sensitised and get enough information on the benefits of these clean energy technologies. This explains why most Ugandans have failed to ensure access to clean energy and clean cooking technologies and the few remaining forests are under threat for firewood collection and charcoal burning.

According to Global Forest Watch, in 2024, Uganda lost approximately 31,900 hectares of natural forest, resulting in about 15.8 million metric tonnes of CO₂ emissions. These energy challenges downplay efforts to promote clean cooking and carbon neutral solutions including achieving the nationally determined contributions (NDC).

The majority of the world's countries, Uganda inclusive made their commitments through the updated 2023 nationally determined contributions to limit greenhouse gas emissions by 24.7 percent by 2030 as part of the Paris Agreement 2015. Additionally, the Ministry of Water and Environment early this year published the National Climate Change Regulations, 2025 to operationalise the climate change Act by establishing rules for carbon projects in Uganda to reduce emissions or remove carbon dioxide from the atmosphere such as planting trees.

Additionally, Uganda is transforming its energy system through the Energy Transition Plan (ETP), where it targets to increase clean cooking access from 15 percent to 40 percent by 2030, which it views as a long-term opportunity to improve energy security and economic competitiveness. However, it might not be possible for the country to achieve these goals within the targeted timeframe when most Ugandans are still depending on biomass fuels, which raise concerns about the increasing of carbon emissions and environmental degradation that contribute significantly to climate change.

Upcoming events

July 2, 2025; Buliisa: Organise a radio talkshow to discuss the impacts of oil activities

July 7, 2025; Kikuube: Disseminate a brief on Hoima Sugar Limited's Environmental and Social Impact Assessment (ESIA) report to protect Bugoma forest

July 7 & 8, 2025; Buliisa and Kikuube: Launch community clean energy demonstration centres to drive clean energy awareness and uptake

July 10, 2025; Jinja: Organise a radio talkshow to share research findings on the impact of agrochemicals on farmers in the Busoga sub-region

July 10, 2025; Kampala: Disseminate a story booklet on aggrieved oil sector workers

July 11, 2025; Online: Organise a Twitter storm to publicise aggrieved oil sector workers' challenges

July 16, 2025; Greater Masaka: Organise a meeting with small-scale farmers to raise awareness on oil risks

July 18, 2025; Kampala: Launch a research brief on attitudes and perceptions of tourism sector stakeholders to Uganda's oil and gas industry

July 31, 2025; Kampala: Convene a meeting with media champions to discuss critical reporting on oil vis-a-vis green economic alternatives

About AFIEGO

Africa Institute for Energy Governance (AFIEGO) is a non-profit company limited by guarantee that was incorporated under Uganda's Companies Act. AFIEGO undertakes public policy research and advocacy to influence energy policies to benefit the poor and vulnerable. Based in Kampala-Uganda, the non-profit company was born out of the need to contribute to efforts to turn Africa's clean energy potential into reality and to ensure that the common man and woman benefits from this energy boom. Through lobbying, research and community education, AFIEGO works with communities and leaders to ensure that clean energy resources are utilised in a way that promotes equitable development, environmental conservation and respect for human rights.

Our Vision

A society that equitably uses clean energy resources for socio-economic development

Our Mission

To promote energy policies that benefit poor and vulnerable communities