

VISION

Resilient and dignified communities,
managing the environment and
natural resources sustainably.



MISSION

Environmental Alert exists to advocate for
an enabling environment, sustainable
natural resources management and food
security for targeted communities through
empowerment and policy engagement.

5th July 2019.

The Secretary, Electricity Regulatory Authority (ERA)
P.O. Box 10332, Kampala, Uganda. ERA House,
Plot 15 Shimoni Road, Nakasero

Dear Sir/Madam;

Re: Objection against the intended conversion of Murchison Falls for a 360 Mw Hydropower Plant by Bonang Power and Energy (Pty) Limited (Save Murchison falls National Park)

Greetings from Environmental Alert¹, the host for Secretariat of the Environment and Natural Resources Civil Society (ENR-CSO) Network² and the Secretariat for the Uganda Forestry Working Group (UFWG)³.

This letter of objection is submitted by Environmental Alert to the ERA for consideration based on the public notice published by ERA on 7th June 2019 and 11th June 2019 in the New Vision requesting the stakeholders and public to give their comments and/or objections in writing to the Secretary to the Authority within 30 Days from the date of the public notice in respect to the application by Bonang Power and Energy (Pty) Limited to establish a 360 Mw Hydropower Plant near Murchison Falls.

The objection is based on the following reasons and arguments for your consideration:

a) The Government of Uganda and Development Partners are applauded for the efforts and investments in the generation of power with due consideration that energy is key engine for development supporting all the other sectors. ***This progress has seen Uganda generate additional excess electricity, some of which is not adequately utilized.*** Thus, according to the Eng. Irene Muloni, the Minister of Energy and Mineral Development, *'the Energy sector is doing great; more energy is produced now but we need to have more industries to consume this power that is produced. The problem we have now is producing a lot of power and not consumed which leads us to pay for the excess energy produced.'* This is based on her remarks during the Ministry of Energy and Mineral Development Joint sector review 2018. *In this regard it's not worthy destroying/disrupting Murchison falls for hydro-power generation, unless there is very strong justification for generation of more energy before utilizing the excess energy!*

b) ***The iconic features and natural beauty of Murchison Falls is a hub for tourism activities in Uganda and is a cornerstone for employment creation and generation of***

¹ See **annex 1 (attached)** for further information about **Environmental Alert**.

² See **annex 2 (attached)** for further information about the **ENR-CSO Network**.

³ See **annex 3 (attached)** for further information about the **UFWG**.

revenue/foreign exchange from various tourism activities and value chains. According to Uganda Wildlife Authority (2019) some of the tourism activities and value chains based on the Murchison falls are: *birding; game drives; hiking & nature walks; cultural encounter; sport fishing; hot air balloons, hotels & lodging; and tour operations.*

As you may be aware, Murchison Falls National Park is the most visited with 33% of the tourism annual visiting Murchison Falls National Park and are more attracted to the Murchison Falls (UBOS, 2018). It's therefore, not surprising that Tourism is Uganda's leading foreign exchange earner with the revenue of USD 1.63bn in 2018 (about 23.5% of the total export) (the Ministry of Tourism, Wildlife and Antiquities' annual tourism sector performance report for financial year 2016/17). Besides, there is great potential to generate more revenues and foreign exchange from Murchison falls through attracting more visitors as more tourism activities and value chains are developed for investment.

Therefore, the destruction or disruption of Murchison Falls will negatively affect the Murchison Falls National Park biodiversity (including: several endangered species e.g. Giraffes) and ecosystem and equally negatively impact on the tourism activities, value chains and associated loss of revenue and foreign exchange. This because destruction and disruption of the Murchison falls through power generation will compromise the nature of the falls and can potentially lead to reduction in the number of visitors to Murchison Falls National Park annually.

c) Overburdening of the river Nile by constructing another hydro-power dam and the associated negative impacts on the environment, biodiversity and ecosystems

Several dams have been constructed along River Nile for Power generation. Some of these include: *Bujagali Power Station (250MW), Kiira Power Station (200MW), Nalubaale Power Station (180MW), Isimba Power Station (183MW), and Karuma Power Station (600MW).* The construction of each of the dams caused various environmental impacts as described in the respective environment impact assessment reports. The proposed construction of the power dam at Murchison falls will certainly have unique environmental and social impacts added on to the Murchison Falls ecosystem and landscape, which is already over burden by earlier impacts. The gravity of the potential risks and impacts are not known.

d) Uganda has several other energy sources (such as: solar, geo-thermal, nuclear,) besides hydro-power generation, some of which are not yet fully explored, developed and utilized.

According to the National Development Plan II, 2015/16-2019/20 (NPA, 2015), the Energy sector in Uganda committed to develop and invest in the following energy sources mix to address the national energy demands: hydro power (4500MW); geo-thermal (1500MW); nuclear (24000MW); solar (5000MW); biomass (1700MW); peat (800MW) and thermal (4300MW).

Were as other energy sources are being developed, the Government of Uganda and Development Partners have placed great emphasis on hydro power development. Thus, a large

proportion of energy is generated from hydro. Despite, this it's important to balance the national energy mix for sustainability. This is possible through exploration and investment in other energy sources.

With the above reasons and arguments, we object the issuance of the permit for construction of the hydro-power dam by Bonang Power and Energy (Pty) Limited at Murchison Falls on River Nile.

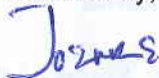
Our recommendation to Government of Uganda through the Electricity Regulatory Authority is to consider power generation from other sources of renewable clean energy that have great potential but not yet explored for investment.

This approach enables maintenance, further development and investment in the Murchison Falls as the cornerstone for the tourism activities and enterprise value chains in Murchison Falls National Park and the country at large.

Moving forward this, will bring more visitors, revenues and foreign exchange that will be used to develop and invest in other sectors including energy sector to steer Uganda in the middle income status in a sustainable way.

Am available for further information and clarifications.

Yours sincerely,



Dr. Joshua Zake (PhD),
Executive Director, Environmental Alert.

On behalf of the Secretariat for ENR-CSO Network and the Secretariat for the Uganda Forest Working Group. .

*C.c. Hon. Godfrey Kiwanda, The Minister of state for Tourism, Wildlife and Antiquities;
C.c. Rt. Hon Rebecca Kadaga, The speaker of parliament of the republic of Uganda;
C.c. Irene Muloni, the Cabinet minister for Energy and Mineral development;
C.c. Executive Director, Uganda Wildlife Authority;
C.c. ENR-CSO Network Steering Committee Members;
C.c. UFWG Steering Committee Members.*

Annexes:

Annex 1: About Environmental Alert

Environmental Alert (EA) was founded in **1988** and in the year **2018** marked **30 years** of contribution to improved livelihoods and development in Uganda through several interventions in sustainable agriculture, environment, natural resources management, water, sanitation and hygiene. EA is officially registered with the NGO Board as a Ugandan non-governmental organization, incorporated as a company limited by guarantee. EA is governed by an independent Board that is responsible for providing strategic oversight of the organization including ensuring its integrity as a voluntary service organization.

EA is a *1st prize winner of the Energy globe award for environmental sustainability-2005 under the category, earth.*

EA is a member of the *International Union for Conservation of Nature (IUCN)* and a *Member of The IUCN National Committee for Uganda.*

EA's vision is a, *'Resilient and dignified communities, managing their environment and natural resources sustainably.'* **EA's mission** is to, *'advocate for an enabling environment, sustainable natural resources management and food security for targeted communities through empowerment and policy engagement.'*

Program and institutional Components:

- a. *Environment and Natural resources management;*
- b. *Food security and Nutrition;*
- c. *Water, Sanitation and Hygiene;*
- d. *Finance and Administration;*
- e. *Resource mobilization and Investment.*

EA hosts Secretariats for following CSO networks:

- a) The Network for Civil Society Organizations in Environment & Natural Resources Sector (ENR-CSO Network) - <http://enr-cso.org/>;
- b) Uganda Forestry Working Group - <http://ufwg.entalert.org/>;
- c) The Standards Development Group (for promotion of responsible Forest Management in Uganda); and
- d) Promoting Local Innovation in ecologically oriented agriculture and natural resources management (PROLINNOVA-Uganda Network) - <http://www.prolinnova.net/uganda>;
- e) National Renewable Energy CSO Network.

Further information about Environmental Alert is available at: <http://entalert.org/>

Annex 2: About ENR-CSO Network

The **ENR-CSO Network** brings together local and international NGOs that work in the broader environment and natural resources sector. The ENR-CSO Network has an elected leadership and a secretariat that coordinates its activities. The Network is active in mobilizing its members' engagement in sub-national and national level forest policy process, including the national and district annual budget cycles. Currently, the network has 55 active official members. Further information about the ENR-CSO network is available at: <http://enr-cso.org/>

Annex 2: About UFWG

UFWG is a platform with a broad spectrum of stakeholders who play different yet complementary roles in their individual, collective and institutional capacities. These include field technical support, small grants management, research and products development, awareness creation, piloting alternatives, media publicity of issues and policy processes, public debate, advocacy and legislative lobbying, budget analysis and advocacy as well as independently monitor the implementation of the Forest Policy commitments. UFWG currently has 50 official members who are actively engaging in the forestry sector in Uganda. Environmental Alert is the Secretariat of the UFWG. Further information about the UFWG is available at: <http://ufwg.entalert.org/>