A Civil Society Organization & Networks Position Paper with suggested Issues and Recommendations for consideration in the National Renewable Energy Policy (2007) Review Process.

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The views, ideas and recommendations in the \position paper are by ***CSOs and Networks*** *working in Renewable Energy at both National and sub national levels.* ***It was formally submitted to MEMD on 23rd February 2018 for consideration.*** The process of gathering and compilation of this information was done by Environmental Alert as the Coordinator, with financial support from ***NORAD*** through ***WWWF-Uganda Country office.***

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1. Introduction – objective of the position paper

- The major objective of the CSO Position Paper is to provide targeted recommendations for consideration during the Renewable Energy Policy, 2007 (MEMD, 2007) review by the MEMD.

The suggested recommendations are based on the CSO's engagements in the energy sector at the national and local levels

2) Rationale for the Renewable Energy Policy (2007) Review

Most of the policies in the energy sector have matured. Thus, the National Renewable Energy Policy, 2007 is mature - now more than 12 years of implementation.

The operational context has changed with several emerging issues i.e. both challenges which should addressed and opportunities that should be tapped into.

This requires changes in Governments policy commitments and strategies to respond to the emerging issues.

The Energy sector is the engine for several other sectors in terms of growth and development. Therefore, must deliver on there needs and demands in respect to Energy.

The Government of Uganda through MEMD embarked on the process to review the policies. CSOs in the renewable energy sub sector like other stakeholders will be consulted as part of the policy review process to give their views and inputs.

Environmental Alert in collaboration with the **WWF-UCO** and within the framework of the ***Clean Energy Access Project Phase II*** and with funding from **NORAD** is *mobilizing and coordinating CSOs for value adding and structured engagements (e.g. structured dialogues) with MEMD to give input into the policy review process among other Renewable Energy sub-Sector development processes.*

3) Methodology used in the generation of the position paper

Highly participatory and interactive methods/approaches were used in the generation of the position paper including the following:

A) Review of relevant documents on renewable energy such as the MEMD, *2002; MEMD 2007; NPA, 2007 & 2015; and* WWF-UCO, (2015).

B) Gap analysis tool was used to review these policies and it involved comparison of the desired situation with the current situation with clear analysis of the underlying gaps/ limitations towards achievement of the desired situation.

C) The Policy Review and Gap Analyses Workshop held on 15th November 2017 at Hotel Africana generated inputs from technical presentations from key stakeholder's experts from *MEMD, Makerere University – School of Women and Gender Studies and the College of Agriculture, Forestry and Environment Sciences*) to give a fair presentation of the achievements, emerging issues (challenges and opportunities) for the renewable energy sector over the 10 years of policy implementation.

The challenges and opportunities there in are the basis for the suggested recommendations to enable the shift/transformation from the current to the desired situation.

D) The review process further engaged key stakeholders from CSOs and networks in the Renewable Energy sub-Sector who provided views and input during the validation meeting at National level. The suggested recommendations were presented during the stakeholder's validation workshop on Renewable Energy.

E) Further input was provided **during the Sub national (mid-Albertine region) stakeholders meeting**. Additionally, CSOs and Networks in renewable energy also reviewed the vision, goal and policy objectives.

4) Key findings from the policy review and gap analyses

Current situation	Desired situation - based on Vision 2040 and NDPII
1. **High Population growth** of an annual rate of 3.2%. This is projected to reach **93.4 million in the next 30 years**. This will exert more pressure on the environment and natural resources. **Over 90% still depends on biomass** (WWF-UCO, 2015).	The **NDPII 2015/16 – 2019/20 (NPA, 2015)** also recognizes the need for increased access to electricity. Hence setting its **target of percentage of the population with access to electricity from 14% to 30%.** A situation where there is sustainable utilization of Renewable Energy.
2. Financing and investment in the renewable energy sector is still low. There is still lack of appropriate financing mechanisms to facilitate the development and promotion of RETs. *--Electrification access is still low, standing at approx. **9% nationally** and **3% in rural areas** due to low finances. 68% of the development budget allocation was provided for to support capacity payments for thermal power generation hence the limited budget for power transmission and distribution (CSBAG 2014).*	--Private sector can easily access funding for investments in RETs for sector development. --Government will invest in research and development (R&D) and pro-vide incentives to encourage use of renewable energy.

4) Key findings from the policy review and gap analyses

3. Innovations and technologies development & transfer *--efficiency and effectiveness* *--standards and value for money* *--affordability and accessibility* *-Limited information on utilization of RETs by population*	--**Increased access to clean, affordable and reliable energy sources** to facilitate industrialization as emphasized in vision 2040 (NPA, 2007). --A situation where people are aware of the various renewable energy technologies/ alternatives to make informed choices -- **Emphasis on improving energy efficiency by promoting use of energy efficient technologies**. Government will support upgrading of industrial technologies to less energy consuming technologies.
4. **Weak Institutional framework to support effective extension support and guidance for sustainable utilization of renewable energy resources** among beneficiaries at household and community levels	--Building the required institutional capacity at all levels (national, local and community) for effective implementation and enforcement of the policy and legal framework.
5. **Legal framework for renewable energy** i.e. current policy and legislation may not effectively address all the emerging issues in the sub sector	--To develop and enforce policy commitments through appropriate acts and regulations.

4) Key findings from the policy review and gap analyses

6. Stakeholder engagement and participation – the renewable energy policy provides for participation various Ministries, Departments and Agencies. However, it's silent on how CSOs in the sector should participate. Despite this, there is some space for CSOs participation through the annual Joint sector review, Energy week, sector working group	--**Advance all-inclusive stakeholder participation and engagement** to add value in policy formulation and implementation based on their mandates, interests, concerns and competences
7. Low level of access to modern energy technologies. Low modern energy coverage throughout the country, especially in the rural areas. Current coverage is about 6% rural and overall 16%, (WWF-UCO, 2015).	--**Increased access to electricity and use of renewable energy technologies**. The **Uganda Vision 2040 (NPA, 2007)** puts the target at **80% access to modern energy by 2040**, up from the access rate of 14% in 2013. --**In-vest in energy technologies and in Research & Development**.

4) Key findings from the policy review and gap analyses

8. The current structure of energy consumption in Uganda accounts for much of the **gender disparity** with nearly 95% of total primary energy consumption due to cooking with biomass fuels. Lack of access to sustainable, clean energy services has economic, social, health and security–related impacts on women's lives, which hinders their economic empowerment. (UN DESA, 2010) --- The GoU is committed to a wide range of international, regional and national policies, legislations and agreements that inform gender. However, the current policies do not provide strategies on how these commitments will be effectively implemented. ---Access to finance for acquiring energy for some women is challenged by the fact that some women don't have collateral security to obtain a loan to install solar or UMEME.	--Increased access to cleaner and more efficient renewable sources of energy to improve **women's socio-economic status, reducing the time and effort spent on household chores** thus giving them time to avail themselves of other social services such as education, and improving their health conditions. --The NDPII 2015/16 – 2019/20 (NPA, 2015) advocates for promotion of renewable energy applications in rural areas. --Have strategies in the international, regional and national policies, legislations and agreements that inform gender.

4.1 Key achievements

a. Uganda currently has **1182 Megawatts (MW) (thus, of this 1174.69 MW is grid supply, were as 7.5 MW is off grid supply)** of installed capacity as at end of May 2019 (ERA, 2019)

b. By end of 2018, **28% of the population** accessed electricity.

c. Established **Public Institutions** with clear roles and responsibilities in **the Energy sector.** Some of these include Electricity Regulatory Authority among others

d. **Platforms for public awareness** on the benefits and opportunities of renewable energy technologies and appropriate institutions e.g. so far **9 annual energy week** have been conducted;

e. **Increased stakeholder participation** e.g. during the **Annual Joint Sector Review** processes and presence of the **Sector Working Group** that enable joint planning for sector development;

f. Government has established ***financial frameworks e.g. Uganda Energy Credit Capitalization Company (UECCC)*** that facilitates investments in Renewable energy sector. Its objective is to provide financial and technical support for projects and programs;

4.1 Key achievements

f. The **private sector** is organized and coordinated through **Uganda National Renewable Energy and Energy Efficiency Alliance** and the **Uganda National Clean Cooking Association**.

g. Uganda Energy Capitalization Trust a framework for pulling resources from government r and development partners for development of Renewable energy projects;

h. Development of the **scaling up renewable energy investment plan** at all scales.

i. Government programs such as *Promotion of Renewable Energy and Energy Efficiency Programme (PREEP), biofuels, waste to energy*, have been implemented to increase access to renewable energy technologies among communities and stakeholders.

j. The civil society in the energy sector are getting better organized/coordinated through the **National CSO Network on Renewable Energy** to effectively deliver on the role of advocacy and independent monitoring. This is through collaboration between **Environmental Alert** and the **World Wide Fund – Uganda Country Office** with financial support from **Norwegian agency for Development Cooperation** based on the framework of the, ***'Increasing access to sustainable and renewable energy alternatives in the Albertine Graben project.'***

4.2 Key practical challenges

a. **Weak institutional framework** to support effective extension support and guidance for sustainable utilization of renewable energy resources among beneficiaries at household and community levels
b. **Inadequate public financing** to develop sustainable and affordable energy supply to match growing demand;
c. **The risk and hazards associated with the Renewable Energy Technologies** (RETs) tools and fire, especially in the case of on-grid energy where there are fire break outs;
d. **Protection of the local industry/private sector** manufacturing Renewable Energy Technologies;
e. **Very high investment and or upfront costs for energy projects** hindering investments in the sector
f. **Inefficient utilization of energy sources** like geothermal and wind. These have not been well exploited and developed to generate energy.
g. **Low modern energy coverage** throughout the country especially in the rural areas (current coverage is about 6% rural and overall 16%);

4.2 Key practical challenges

h) **Weak coordination** in energy research, development and technology transfer;

i) **Inadequate research and development**, thus various research gaps in the renewable energy sub-Sector. E.g. the utilization of RETs by population; inadequate information on resource availability for energy projects such as (geothermal, solar, wind, and mini- and micro-hydro) have hindered investments in these projects;

j) **Poor quality and standard of the renewable energy technology products**;

k) **Limited technology transfer** for the various Renewable Energy Technologies e.g. for stoves;

l) **Limited access to the RETs** by the most vulnerable communities (need for the definition of the vulnerable)

m) **Weak/inadequate coordination of different players and stakeholders** leading to overlapping interventions

4.2 Key emerging opportunities

i. **77% of Uganda's population** (UBOS report, 2017) is dominated by the **youth under 30 years of age**. This young population presents an opportunity that the country can capitalize on to increase its competitiveness and can participate in various renewable energy enterprises if organized;

ii. **Government programs/projects promoting renewable energy technologies** (RETs) like improved cook stoves, solar, briquette making among others. Such programs can be up scaled and replicate best practices for wider impact;

iii. **Existing private companies and networks** engaged in RETs play an important role in promoting access to the technologies and innovations. These present an opportunity for government to work with such through the public private partnership arrangement;

iv. **The existing financing mechanisms** (e.g. Uganda energy credit capitalization company (UECCC) which facilitates investments in renewable energy sub sector through financial and technical support for renewable energy projects and programs;

v. The abundant wind, sun, and thermal which can be developed further to enhance modern energy;

vi. **Agriculture waste** that can be used to make renewable energy alternative such as briquettes.

4.3 Reflection on the Renewable energy policy, 2007

Current Overall Policy Vision as is in the Renewable Energy Policy, 2007.	Key observations and comments
To make modern renewable energy a substantial part of the national energy consumption	The **Vision of the policy is still relevant** because the Uganda Vision 2040 (NPA, 2007), commits that GoU will develop and generate modern energy to drive the industry and services sectors. It is estimated that Uganda will require 41, 738 MW by 2040, thus increasing its electricity per capita consumption to 3,668 kWh. Furthermore, the access to the national grid must significantly increase to 80%. That the required capacity will be generated from different energy sources namely: *hydro power (4500MW); geo-thermal (1500MW); nuclear (24000MW); solar (5000MW); biomass (1700MW); peat (800MW) and thermal (4300MW).* The National Development Plan II, 2015/16-2019/20 (NPA, 2015) also commits the Energy Sector to focus on the following areas: a) Increasing power generation capacity to drive economic development; b) Expanding the electricity transmission grid network; c) Increasing Energy Efficiency; d) Promoting the use of alternative sources of energy; and e) Strengthening the policy, legal and institutional framework. Therefore, in the current vision it's important to define substantial part i.e. by what proportion based on the commitments in the National Development Plan II, 2015/16-2019/20 (NPA, 2015) and Uganda Vision 2040 (NPA, 2007).

4.3 Reflection on the Renewable energy policy, 2007

Current Overall Policy Goal as is in the Renewable Energy Policy , 2007	Key observations and comments
To increase the use of modern renewable energy, from the current 4% to 61% of the total energy consumption by the year 2017'.	**The policy goal is still relevant** because the Uganda Vision 2040 (NPA, 2007), commits to increase access to electricity and use of renewable energy technologies. The target is at 80% access to modern energy by 2040, up from the access rate of 14% in 2013. The **National Development Plan II, 2015/16-2019/20 (NPA, 2015)** also commits the Energy Sector to focus on the following areas: a) Increasing power generation capacity to drive economic development; b) Expanding the electricity transmission grid network; c) Increasing Energy Efficiency; d) Promoting the use of alternative sources of energy; and e) Strengthening the policy, legal and institutional framework. Also the commitments in the **Uganda's Sustainable Energy for All Initiative Action Agenda, (MEMD, 2015)** commits by 2030 the following: a) *Universal access to modern energy – >98% of the population must access electricity by 2030; >99% of the population with access to modern cooking solutions* b) *Doubling share of renewable energy in global energy mix - >90% for Power and 36% for Thermal.*

4.3 Reflection on the Renewable energy policy, 2007

Current objectives as is in the Renewable Energy Policy, 2007	Key observations and comments
Objective i) Develop, implement, maintain and continuously improve the legal and institutional framework that responds to the prevailing conditions, in order to maintain interest in renewable energy investments.	**The policy objective is still relevant.** However, the new policy objective should focus the following: a) *Strengthening the capacities of institutions established for effective and efficient delivery of their mandates, roles, responsibilities and obligations;* a) *Enhancing coordination of different stakeholders/key players from within and outside the Energy sector;* a) *Developing regulations, standards and guidelines and related implementation for enforcement of policy commitments and strategies.*
Objective ii) Establish an appropriate financing and fiscal policy framework that will attract more investments in Renewable Energy Technologies.	**The objective is still relevant,** however -- financing/ investments should also include other pertinent issues beyond technologies. For instance, Research and Development; Institutional capacity building; Technology development and Transfer

4.3 Reflection on the Renewable energy policy, 2007

Objective iii) Mainstream gender and poverty issues in renewable energy development strategies to improve the socio-economic wellbeing of women and the poor in general.	**The objective is still relevant**, but should include other **gender categories such as Youth – Boys & Girls; Vulnerable & Disadvantaged Groups and Communities** (*e.g. Children, People With Disabilities, Internally Displaced People/Refugees, Minority Groups/Direct Forest Dependent Communities – e.g. the Tepeth, Benet …, Aged, Communities in hard to reach areas – Schools & Health Centers in Islands, Mountain…*). The **mainstreaming of gender** should be supported with **adequate budget allocation through gender planning and budgeting at all levels of policy implementation**.
Objective iv) Disseminate information and raise public awareness on the benefits and opportunities of renewable energy technologies and build capacities in appropriate institutions.	**The objective is still relevant**, but should not be limited to benefits and opportunities in the sector. Thus, it should also include targeted dissemination and awareness for other requirements (e.g. overall policy and legal framework, information from research studies…) for effective and efficient policy implementation.
Objective v) Promote Research and Development, technology transfer, international cooperation and adoption of standards in RETs.	**The objective is still relevant**, but additionally **focus should as well target at strengthening coordination among Research and Development Institutions** in the Renewable Energy Sector.

4.3 Reflection on the Renewable energy policy, 2007

Objective vi) Manage the biomass resource base in a sustainable manner.	**Objectives vi, vii, and viii are still relevant,** but they leave out other key **Renewable Energy sources** (e.g. Geothermal, Biogas, Solar…) that are not yet harnessed and tapped to full potential. Thus, these should as well be equally considered at objective level.
Objective vii) Promote the use of biofuels.	
Objective viii) Promote the conversion of municipal and industrial wastes to energy.	

5.0) Key recommendation for consideration in the Renewable Energy policy review process

a. **MEMD should establish a decentralized coordination** at District Local Government levels to support the promotion of renewable energy investments at the lowest level;

b. **MEMD should support Local Governments to mainstream renewable energy in local government** (district and sub county) planning and implementation;

c. **MEMD and MWE should support Local Governments i.e. district and sub counties to develop and implement *Renewable energy strategies, ordinances and bylaws*** to advance sustainable Renewable energy utilization;

d. **MEMD should pursue/fast-track financing and investment in the sector** through public private partnerships (PPP), to increase finance and investment in the sector;

e. **MEMD should set aside a renewable energy fund;**

f. **Financing at the lower level through tapping into the oil revenues.** This could be through the following strategies when integrated in the policy: i) *Cooperate social responsibility requirements by the private sector should also support investments to advance access to renewable energy technologies by the vulnerable/poor communities; ii) A portion of loyalties to the local governments should be allocated to promote renewable energy technologies invest and access; and iii) Setting aside – for each litre of oil sold at least 1 shilling should be reserved for investment in access to renewable energy at all levels.*

5.0) Key recommendation for consideration in the Renewable Energy policy review process

g) MEMD should enhance coordination of R&D in renewable energy through effective coordination with R&D institutions (such as Academia, National Forestry Resources Research Institute (NAFORRI) and CSOs);

h) MEMD should upscale establishment of mini-hydro power generation targeting remote and rural areas with potentials to have these developed;

i) MEMD should come up with **mitigation actions that can be integrated in the Strategic Environment and Social Impact Assessments** for the policy before implementation;

j) The Renewable energy policy **should maintain and increase tax barriers** on some renewable energy technologies e.g. improved cooking stoves from foreign countries;

k) **Provide significant subsidies to enable the most vulnerable communities to access clean RETs**;

l) **MEMD should enhance collaboration between the Ministry of Gender, Labor and Socio Development** to support and advance mainstreaming of gender in Renewable Energy sector policies planning and implementation at all levels;

m) Promote use of **Village Loan and Saving Scheme** to scale up RETs for improved access and benefit to women groups.

6. Acknowledgements

- Appreciation is extended to ***WWF and NORAD*** for the financial support towards this initiative within the framework of the project titled, '*Increasing access to sustainable and renewable energy alternatives in the Albertine Graben*.
- We would like to thank all ***CSOs and Networks in Renewable energy*** at both national and sub national level.
- Special thanks to the ***Ministry of Energy & Mineral Development*** *and the* **Ministry of Water and Environment** for providing the necessary information and guidance in some of the Network engagements.

Key References

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7. About the National Renewable Energy CSO Network

- The ***National Renewable Energy CSO Network*** is a loose semi-formal Network that brings together civil society organizations, academic institutions, individuals and Networks engaged in the promotion and development of activities and practices in the Renewable energy sub sector at all levels *(*i.e. national, local, sub-regional and community*)*.
- These CSOs and Networks are currently being mobilized and coordinated by EA for structured engagements with Government through the Ministry of Energy and Mineral Resources.

Objectives of the Network

a. To advocate for promotion, compliance and accountability of government with respect to its policy commitments and private sector activities;

b. To ensure that individuals, institutions, CSOs and Networks engaged in Renewable energy progressively develop capacity in policy analysis, advocacy and independent monitoring;

c. To engage in policy lobbying for conducive policy environment for renewable energy access and sustainable utilization.

Scale of Network outreach

- Currently, the Network has a total of **36 profiled CSOs and Networks at national level** and **90 NGOs and CBOs are engaging at the sub-regional level across 20 districts in the Albertine Rift** including: *Kasese, Bushenyi, Rubirizi, Mitooma, Rukingiri, Kabarole, Kisoro, Bundibugyo, Masindi, Hoima, Buliisa, Kagadi, Kyenjojo, Ntoroko, Arua, Nebbi, Koboko, Moyo, Adjumani and Maracha districts.*

8. About Environmental Alert

Environmental Alert was founded in **1988** and is officially registered **Non Government Organization** with board. Thus, in 2018 – EA made **30 years** of contribution to **food security and sustainable environment and natural resources management in Uganda.**

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

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

Environmental Alert envisions, ***'Resilient and dignified communities, managing their environment and natural resources sustainably.'***

Environmental Alert's mission is to, ***'Contribute to improved livelihoods of vulnerable communities by Enhancing agricultural productivity and sustainable natural resources management.***

Further information about Environmental Alert is available at: http://envalert.org/

Environmental Alert hosts Secretariat for following 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.envalert.org/;

c) The **Standards Development Group**; and

d) Promoting Local Innovation in ecologically oriented agriculture and natural resources management (PROLINNOVA-Uganda Network) http://www.prolinnova.net/uganda.

Thank you for listening. For God and my County.

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