

**WRITTEN RESPONSES TO DRAFT REPORT CONSULTATIONS**

## **Written Responses to Draft Report Consultations for the WS Atkins' March 1999 EIS\***

In order to ensure that stakeholder comments were fully reflected within the Final EIS and in accordance with NEMA environmental guidelines, 14 full copies (three volumes) of the WS Atkins' 1999 Draft EIS and a further 26 copies of the Executive Summary were distributed to stakeholders as shown in Table F1. Thirteen written responses were received and these are included with this attachment to Appendix F of the Hydropower project EIA (2001). WS Atkins' response to each of these letters is provided on a sheet following the letter. Follow-up letters were sent and acknowledged to those stakeholders who had not responded together with numerous phone calls. After a month of intensive correspondence with non-compliant stakeholders it was decided to finalise the EIS with those responses that had been made as non-compliant stakeholders would have a further opportunity to respond during the NEMA statutory consultation process.

Several of the respondents raised questions of detail about items that have been fully covered in the report, but that they either had not noted or because the stakeholders only received the Executive Summary in which the detail was not included.

\*Note that all paragraph/volume/chapter references in this Appendix F attachment refer to the WS Atkins EIS (1999), not the Hydropower EIA (2001).

**Table 1 Draft Report Consultations**

Stakeholder	Full Version	Executive Summary	Date	Response Date
NEMA Executive Director	3 copies		15/1/99	1/3/99 No comments Not obliged to give comments on draft
Office of the Prime Minister	Yes		20/1/99	No comments
Min. of Energy and Minerals (Richard Kaijuka)	Yes		20/1/99	No comments
UEB	Yes		20/1/99	No comments

<b>Stakeholder</b>	<b>Full Version</b>	<b>Executive Summary</b>	<b>Date</b>	<b>Response Date</b>
(MD Alex Mugoya)				
Min. of Disaster Management Preparedness and Refugees	Vol 3	Yes	21/1/99	23/2/99
Min. of Lands Water and Environment		Yes		
Town & Country Planning Board	Yes		21/1/99	2/03/99
Min. of State Agriculture (Kibirige Sebunya)		Yes	21/1/99	No comments

<b>Stakeholder</b>	<b>Full Version</b>	<b>Executive Summary</b>	<b>Date</b>	<b>Response Date</b>
Min. of Tourism, Trade & Industry (Brig. Moses Ali)		Yes	21/1/99	Comments ready, but handed to Minister for review
Minister of Gender, Labour and Social Development	Yes		20/1/99	No comments
Makerere University Library	Yes		20/1/99	No comments
Makerere University Institute of Environment & Natural Resources	Yes		20/1/99	4/02/99

Stakeholder	Full Version	Executive Summary	Date	Response Date
RDC Mokono	Yes		22/1/99	11/02/99
RDC Jinja	Yes		22/01/99	EIA OK no time to write
LC5 Mokono	Yes		22/01/99	EIA OK
LC5 Jinja	Yes		22/01/99	16/02/99
Kingdom of Busoga	Yes		22/01/99	EIA OK

Stakeholder	Full Version	Executive Summary	Date	Response Date
Minister of Works, Housing and Communications (Dir. Of Housing Emmanuel Byaruhanga)		Yes	22/01/99	EIA OK
Min. of Health		Yes	22/01/99	No comments
Forest department, Commissioner (Dr Fred Kigenyi)		Yes	21/01/99	No comments
Fisheries Research Institute, Jinja		Yes	21/01/99	5/02/99

<b>Stakeholder</b>	<b>Full Version</b>	<b>Executive Summary</b>	<b>Date</b>	<b>Response Date</b>
(Dr Bugenyi)				
Uganda Wildlife Authority (Acting Ex.Dir. Dr. Saul Kayi)		Yes	21/01/99	EIA o.k
Dir. Of Water Development Jinja		Yes	21/01/99	5/02/99
DHOs, Jinja		Yes	21/01/99	15/02/99
DHO's Mohono		Yes	22/01/99	EIA OK



Stakeholder	Full Version	Executive Summary	Date	Response Date
DEOs Jinja		Yes	21/01/99	5/02/99
DEOs, Mokonono		Yes	22/01/99	4/02/99
Adrift		Yes	21/01/99	5/02/99
Nile River Explorers		Yes	21/01/99	5/02/99
Kyabirwa Nature Reserve		Yes	Not sent out	No comments

Stakeholder	Full Version	Executive Summary	Date	Response Date
TSMIP/MADA Holdings (MD)		Yes	21/01/99	15/02/99
NGO Aids Support Organisation Jinja		Yes	21/01/99	12/02/99
NGO Uganda National Farmers Association Jinja		Yes	21/01/99	No comments
LC3 Jinja		Yes	22/01/99	11/02/99
LC3 Mokono		Yes	21/01/99	5/02/99

Stakeholder	Full Version	Executive Summary	Date	Response Date
LC1 Jinja (Namizi, Kyabirwa, Buyala)		Yes	21/01/99	12/02/99
LC1 Mukono (Kikubanutwe, Malindi, Buloba, Naminya)		Yes	21/01/99	11/02/99
LC 2 Mukono, (Malindi, Naminya)		Yes	21/01/99	5 <sup>th</sup> and 11/02/99
LC2 Jinja (Namizi, and Ivumamaba)		Yes	21/01/99	11/02/99

<b>Stakeholder</b>	<b>Full Version</b>	<b>Executive Summary</b>	<b>Date</b>	<b>Response Date</b>

Omitted from this chapter. Another resort not mentioned in this chapter is the Explorers Campsite. Over 95% of visitors are attracted to the site because of white water rafting and kayaking. The whole theme revolves around white water rafting and is also a centre of information to prospective clients. The Campsite relies totally on white water rafting and kayaking where most clients stay an average of 2-3 nights. The site at present receives an average of 300 visitors per month.

It is also indicated in the same chapter that there is potential for white water rafting to continue further down stream. Nile River Explorers does not run any significant rapids past Dumbell Island. The section below the Dumbell Island we feel is dangerous and should not be attempted commercially. There are no rapids near Masindi Port. Karuma Falls is also in the process of developing hydropower therefore there is no potential for white water rafting there. Murchison Falls National Park was first attempted by NRB in July 1995 with disastrous effects. Guides were lucky to get out alive after the raft was savaged by crocodiles.

The first issue to raise here is an allegation with regards to the earnings generated by white water rafting, that "a significant amount goes directly offshore". NRB has never sent money offshore. All earnings are kept in Uganda and put straight back into developing our tourist base.

The species of snails that play host to schistosomiasis are not common in this section of the Nile. Contrary to what we are led to believe in the report, in any case, the water is flowing quite fast so all parasites would be washed away. After our two years rafting the Nile, no guides from NRB have been diagnosed positive with bilharzia. Creation of a reservoir of water would create the ideal habitat for transmitting schistosomiasis and create ideal breeding conditions for mosquitoes.

A proper environmental impact study has been done on the present effluent going into the lake but because of the large volumes of water moving, it was found to have absolutely no negative impact on the environment. Nile Breweries, Nytil, Muluk, hotels and tanneries all who pass effluent into lake Victoria will now have this effluent trapped in a relatively small reservoir without having it being mixed and diluted in the fast flowing waters of the Nile.

Biological Environment

Sub-headings have been followed and will be analysed as queries arise.

Thank you for allowing us the opportunity to see the EIA and for being given the opportunity to respond. We hope to foster good co-operation although we must point out some errors of fact.

RESPONSE TO AESNP BIJAGALI HYDROPOWER PROJECT

Nile River Explorers  
47 Wilson Avenue  
Jinja, Uganda  
PO Box 2155  
Tel. & Fax: 256 (0) 43 120236  
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Mobile: 075 22 6055  
Email: rafting@starcom.co.ug



28/01/99 20:21 FAX

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ANCILLARY EARNINGS GENERATED DIRECTLY FROM WHITE WATER RAFTING

Unit sales/cost	Earnings
T-Shirt sales ±150 @ 15	US\$2,250.00
Rafting shorts ±50 @ 20	US\$1,000.00
Rafting shoes ±25 @ 20	US\$ 500.00
Photographs and video footage ±20 @ 35	US\$ 700.00
Rafting hats ±100 @ 15	US\$1,500.00
	US\$ 5,950.00
	US\$25,050.00

\* does not include bar and food sales

Activity	No's	Cost	Gross Earnings
White Water Rafting	± 200-250	US\$65.00	US\$16,250.00
Kayak School	± 30-50	US\$30.00/day	US\$1,500.00
Explorers Campsite	± 300 nights	US\$2.00	US\$600 *
Backpackers	± 150 nights	US\$5.00	US\$750 *

TABLE OF TOP 4 INCOME EARNERS FOR NILE RIVER EXPLORERS

NB: All figures are based on earnings for one month

Explorers Backpackers Hostel also relies totally on rafters and kayakers for business. In both cases, over 95% of clients raft or kayak.

Explorers Campsite, situated on the river just upstream of Bujagali would suffer negative impact as a result of the project. The site is an important location for rafters and kayakers for information and camping, and therefore relies totally on white water activity. Many Adrift white water rafters stay at Explorers Campsite.

The impact to Nile River Explorers is far greater than Adrift's as NRE's one day rafting trips start at the tailwaters of the Owen Falls Dam and only two minor rapids are rafted below the proposed hydroproject site. The hydroproject scheme not only destroys NRE's white water rafting, but NRE's kayak school.

Impacts on Tourism

VOLUME 3

Explorers Kayak School has shown tremendous growth over the last year and a half, with between 30 and 50 clients instructed monthly. This represents a significant revenue earner for Nile River Explorers. To run a good kayak school requires good white water rapids, which would be lost to the Bujagali Hydroproject.

Explorers Backpackers chooses to stay for long periods. The hydroproject will, if it is allowed to go ahead, be directly responsible for closing Explorers Backpackers. There has never been any mention of our closing Explorers Backpackers as has been indicated. The opposite is in fact the case with the recent re-location to a larger more spacious Backpackers to cope with the increasing demand.

We feel very bullish about Uganda's future in tourism and would want to be involved in future tourism schemes. A speedy resolution needs to be settled on, firstly as being customer focused, we need to inform travel agents on our future developments. Our goodwill business is very strong and their support would certainly follow us. Unlike our opposition who are advertising oriented, Nile River Explorers is consumer service orientated and would need to fulfil our client's needs in the future. Brokers, Lawyers and even environmentalists have approached Nile River Explorers who all see this as an opportunity to make money. We have however chosen to pursue a policy of co-operation, where a reasonable settlement may be negotiated.

CONCLUSION

Due to time restraints in responding to the final draft report Nile River Explorers cannot give cost breakdowns of expected expenses, only that NRE would like to pursue the setting up of river safaris in and around the Nile Delta at Murchison Falls. These would include a base camp or lodge and river cruise tours on luxury river craft.

1.17 Nile River Explorers would also like to make use of AESNP – sponsored Tourism Development Programme. We have identified areas of development which would benefit all parties concerned i.e. Ugandan Tourist base EASNP Nile River Explorer by developing eco-tourist activities in Zones 3 and 4 as outlined under point 1, selection of priority areas for tourism growth.

Nile River Explorers have followed a style of business as practised by some companies operating on the Zambezi River – preferring to be more consumer focused, with a long term approach rather than our competitors style which is advertising focused and tends to be more short term. NRE's consumer orientated strategy and customer service creating long term committed customers has paid off. As indicated in the table in the report, the split on white water rafting clients is about 30% to Nile River Explorers and 70% to Admilt. This split is definitely not accurate as the split is now at least 50/50, if not stronger in NRE's favour. Nile River Explorers has focused on profitability before market share, maintaining significantly lower overheads. Location (committed to Jinja) and being people orientated has proven the better business strategy.

The Explorers Campsite is discussed in para 4.274 (but not mentioned in the summary). We have slightly altered the wording of this paragraph to remove the phrase "close

could address the downstream rafting potential in detail. 6.36 we propose a Nile River Tourism Strategy as a mitigation measure. Clearly this Three of the four are below Dumbbell Island at points 8,9 and 11 on Vol 1, Fig 8. In para "Adrift raft the Big Four exclusively the legendary class 5 rapids of the White Nile". Nile Special on the second day will take your breath away". The brochure also states that downstream from Bujagali. The brochure comments that "Mighty rapids like Malalu and Adrift brochure advertises two-day trips on the Nile as far as Nabuganyi about 50 km Figure 8 of Volume 1 shows a number of rapids downstream from Bujagali. The current

paid only in Uganda shillings which was used only within Uganda. not aimed specifically at NRE. However, we noted that a substantial number of rafters pay for their trips by credit card and we would find it surprising if all expatriate staff were In para 5.185 we comment on economic leakage. The comment was a general one and

## SOCIO-ECONOMIC ENVIRONMENT

increase in schistosomiasis incidence. recommendations in the EAP are implemented we do not believe that there will be a great project and note an increased risk and discuss mitigation in para 6.40 to 6.44. If the disease is not common at present. In para 5.153 and 5.155 we discuss the effects of the Baseline schistosomiasis conditions are discussed in para 4.77 et seq. We agree that the

along with legislation's come into force water treatment is the long term solution. Retention time in the reservoir is short (0.7 days) and the average depth relatively shallow (para 5.120) so the diluting effect will not be diminished. Dilution may be an acceptable pollution mitigation measure now but as economic growth and environmental awareness

*Biological Environment*

**Nile River Explorers**



- NRE estimate their gross monthly earnings from WWR activities to be \$25,000. In Table 5.19 we estimated annual gross loss to NRE to be \$230,000. We may have very slightly under-estimated the sales from ancillary products.
  - In Table 5.19 we estimated the business split between NRE and Adrift to be 36-64. Recently NRE may have increased their share but the Table is based upon actual data given to us by both NRE and Adrift at the time of our fieldwork in August 1998.
  - If the Nile River Tourism Strategy Study goes ahead NRE and Adrift would be expected to make a significant contribution to its findings. We believe that there will continue to be considerable tourism potential on the Upper Nile after Buqagali is completed.
- 1.1.1 Impacts on Tourism
- We acknowledge in para 5.181 that there will be a "severe loss of an existing tourism development". This phrase has been incorporated into the summary.

Mick Barnett  
Operations Manager  
Adrift (U) Ltd



Yours sincerely,

We appreciate the opportunity to comment on the EIA.

It is important to note that the EIA was not delivered to our offices and we received it 13 days after it was dated. The document was handed to a travel agent in Jinja that handed to a client that handed to a hotel in Jinja.

3. There is mention of potential for WWR downstream from Bugajali. It states that this is not yet developed, this is incorrect. Adrift have been rating this section for one year come April on two day rafting ops. This section of river is of a much lower grade (not as exciting) and by no means competes with the section rafted on the regular one day section. This means that the Nile will no longer be in competition with the Zambezi in Zimbabwe as Africa's best river. The effect will be an instant loss of all overland truck tours as clients. The Nile's fast growing reputation as one of the worlds most exciting one day raft trips will be lost, creating a massive downturn in the current numbers of clients that go WWR.

2. There has been no mention of compensation for rafting companies. The construction of the Bugajali dam will destroy Uganda's most popular and fastest growing tourist activity - whitewater rafting. The companies who have invested in Uganda to grow this industry must be compensated for the loss of revenue.

1. It takes no account of the grass root revenue generated by the whitewater rafting industry. Adrift (U) Ltd employ over 40 people per day from villages along the upper Nile. Whitewater rafting has created employment in villages where previously there was none. There has been no consideration of the fact that this is a long-term employment for these villages and that the numbers of those employed will increase with the growth in the industry. These losing their jobs as a result of the construction of the Bugajali Hydropower Project must be compensated for this loss and receive regular installments of income.

The Bugajali Hydropower Project EIA makes several glaring omissions:

Dear Sir,

First Response to Environmental Impact Assessment Draft Final Report

Project Manager  
AESNP  
Peter O'Neill

5 February, 1999

tel / fax: +256 (041) 258670 • mobile +256 (075) 707 660  
e-mail: [adrift@starcom.co.uz](mailto:adrift@starcom.co.uz)

**ADRIFT (UGANDA) LIMITED**  
P O Box 7661  
Kampala  
UGANDA

- The question of downstream rafting conditions is unclear. We understand that there several high-grade rapids similarly to those above Dumbbell Island but that they are more spaced out on the lower reaches of the river. Without market research it is difficult to evaluate whether or not high grade rafting (more exciting) draws more tourism than lower grade rafting. Adrift's comments are at odds with information contained in their current brochure (see comments above under NRE).

### Point 3

- To the best of our knowledge there is no mechanism or associated statutory requirement for compensation to be paid to private companies. However, AESNP is taking active steps to encourage and develop tourist potential that will be realised after the construction of the hydropower plant.
- AESNP will be undertaking a range of activities to benefit local communities as proposed in the EAP. It is understood that the majority of local people are employed on a freelance basis para 4.278. WWR only commenced two to three years after the area had been identified for power generation and as such direct compensation would not apply.

### 1.1.1.1 Point 2

- Grass roots employment is discussed in para 4.277 and shown in Table 5.19. WWR is undertaken as a commercial business and as such the risk associated with any commercial undertaken of this nature should be fully explored before commencement.

### Point 1

*Adrift*

cc Brett Ogilvie (for information)

Professor Derek Romero  
Deputy Director



Yours sincerely,

We think that at the least, and indication should be given that the TSC data are held at AES Nile Power, and available on request. They are baseline data and the counts could be repeated in the future, to monitor changes in the surrounding farmland areas.

4-15	4.59	last	1010, not 1110
8-10	4.60	5	The TSC results are not in Appendix B
8-10	8.41	2-3	Surely this should be staff of the FD, not 'representatives'?
			Monitoring planted trees involves a series of silvicultural activities, not just their 'health'

Page para line comment

We have only a few comments on this report, which is overall an impressive compilation.

Draft final Bujaqali EIA Report

Dear Mr O'Neill,

The Project Manager,  
AES Nile Power

4 February 1999

Makerere University Institute of Environment and Natural Resources  
PO Box 7298, Kampala, Uganda  
Phone 256-41-530135 fax -530134 e-mail derek@imul.com

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- The suggestion that counts could be repeated post-project has been noted by AESNP.
- The TSC data were omitted from Appendix B in error and have now been included.
- Amendments have been made to the text as requested and errors corrected.

*Makerere University Institute of Environment and Natural Resources*

04/02.09 12:59 TX/RX NO. 4629 P01

04/02.09 12:59 TX/RX NO. 4629 P01

3. Why should the new transmission lines from the 132KV sub-station be the subject of a separate EIA?

Information on the alternative sites at Bugaali as reported in volume 2 of the back-ground reports. In short, what are these alternative sites and where are they with reference to the Owen Falls Dam?

2. Under the Bugaali Projects (Page 7, it would have been better if the draft Report was paginated)

Under Introduction - the current contribution of hydropower, to the country's energy needs/sector, the percentage of Uganda's population within access to hydropower, and the potential of projected earnings through power exports should clearly be brought out. As the document stands, these items are not highlighted.

1. Under Introduction - the current contribution of hydropower, to the country's energy needs/sector, the percentage of Uganda's population within access to hydropower, and the potential of projected earnings through power exports should clearly be brought out. As the document stands, these items are not highlighted.

Our comments are going to appear wanting because we would have preferred to have each of the executive summaries of the 3 volumes (and then this overall executive summary). It is highly likely and natural that it is what one wants to appear in a good EIA that one includes in the report. The following comments are mainly based on the likely ecological and socio-economic impacts that can predictably come as a result of having the hydropower station within 2.5 km radius as stipulated in the draft report.

In response to your request letter to me, (dated 21 January 1999) I and Dr. J.S. Bahr, undertook to read the draft Report and the following comments, (as indicated in your (ii) and (iv) came out:

**Re: Comment on the Bugaali Hydropower Project EIA Draft Final Report.**

Dear Mr. O'Neill,

Fax: 256 (0) 41 346 952

Mr. Peter O'Neill,  
Project Manager,  
AES Nile Power  
P.O. Box 24401  
Kampala

February 4 1999

43/REI/23



FISHERIES RESEARCH  
INSTITUTE, (FIRI)  
P.O. BOX 505  
JUBA, UGANDA  
TELEPHONE: 256-41-3546  
TELEFAX: 256-41-3546

04/02 '99 12:58 TX/RX NO. 4829 P02

F.W.B. Bugenyi  
Director, FIRI

Sincerely,

P.P. J.S. Baitwa  
Senior Research Officer

Those are some of the comments from the Draft report, which as we said earlier does not give us the whole story. Under the biological environment, it is clear that fisheries and water quality of the Upper Nile system are at present increasingly taking on socio-economic impacts. Studies on these should more clearly be spelt out in the proposed EAP especially as the Nile system harbours many fish species which are threatened in both lakes Victoria and Kyoga. It is said that the major issue of the project concerns resettlement. There have been of late conflicting reports of what has been agreed upon by the concerned parties. What the current position is should be brought out more clearly.

6. Socio-economic Environment

Is the loss of Bugagali shrines absolutely inevitable - so it may be asked?

5. Under cultural impacts

In general also, how the project impacts downstream future schemes e.g. at Karuma, Ayago, etc. besides the hydrological situation in lower basin countries - Sudan and Egypt. First, the hydrological considerations. It is important to clarify on the hydrological situation of Lake Victoria - historical, present and future. We still miss the anticipated change in flow characteristics, the future hydrological situation of Lake Victoria (with or without El-Niño like effects, seasonal fluctuations, etc) and how these could scheme but also to the appearance/disappearance of certain habitats related to wetlands, fish, birds, disease vectors, etc.

Biological Environment (Under Impacts)

For a more objective evaluation of all scenarios and intended mitigation measures, partially or not at all submerged. This report ought to state this clearly and allow for example it is not clear at all if the present Bugagali Falls are to be completely intrinsic values which are of obvious public interests will be impacted. It is stated that the project site is 2.5 Km downstream of Bugagali Falls, but nowhere is it mentioned to what extent if any, the present scenic aspects and

2 '99 12:41 FAX

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• The transmission line EIA was commissioned as a separate study from the hydropower EIA because the initial development conceptual obligation only required the developer to evacuate the power generated from Buyagali to the nearest connecting point of the UEB transmission network. Furthermore, during contact negotiations, Government stated that it would be preferable and prudent to rehabilitate the existing UEB transmission system in light of the proposed future electrical sector reforms and potential generation capacity proposed. During contract negotiation the hydropower project undertook to incorporate this into the overall development and implementation plan. However, as neither the detailed technical specification for the transmission network had been agreed at the time of the hydropower EIA commissioning nor had the issue of ownership of the transmission facility been agreed the only option left was to undertake the transmission EIA as a

• Table 3 of the summary gives information on alternative sites at Buyagali. Volume 2, Figs 7-9 show alternative sites at Buyagali that were investigated to determine the optimum site overall both environmentally and economically.

#### 1.1.1.2 Point 2

• The section on the current power situation within Uganda and the project's contribution to the energy sector given in the Executive Summary was omitted from the Main Report Introduction in error. This has now been rectified.

#### Point 1

• The report follows NEMA and IFC EIS documentation structure and provides an Non-Technical Executive Summary for all three volumes at the start of the Volume 1. Each volume provides conclusions to the impacts investigated and these are summarised within the Executive Summary.

#### Introduction

#### NARO



- The loss associated with the current location of the Buyagali shrines is inevitable due to the increase in water level as stated in para 5.178 et seq. Relocation through ceremonial procedures is acceptable and is further discussed in Vol 3 para 6.15
- Buyagali is in effect a run of the river scheme due to the site being the nearest optimal location to the existing Owen Falls hydro. Being the next hydropower site downstream from Owen Falls there will be no impact on downstream future schemes. Correct sequencing reduces the impact and can benefit future developments downstream. Out of sequence development can constrain future upstream development adding significantly to the cost and impact of the downstream development.
- Buyagali is in effect a run of the river scheme due to the site being the nearest optimal location to the existing Owen Falls hydro. Being the next hydropower site downstream from Owen Falls there will be no impact on downstream future schemes. Correct sequencing reduces the impact and can benefit future developments downstream. Out of sequence development can constrain future upstream development adding significantly to the cost and impact of the downstream development.
- Flow regulation of the Nile is likely to improve with the project (para 5.10). Retention time is less than 24 hours and there will be no impact on lower Nile basin countries.
- The hydrology of Lake Victoria is discussed in detail in para 4.21 et seq. Effects on habitats are discussed in para 5.145 et seq following a detailed base line discussion in para 4.44 et seq.

#### *Biological Environment*

- The scenic impact is summarised in Table 1 and discussed in para 5.131 et seq. Fig 9 shows the area of inundation with Buyagali Falls located in the middle of the lake. The land associated with the Buyagali rapids will not be totally submerged and will take the form of an island. Due to the increase in water level associated with the hydro facility the rapids will be completely submerged.
- separate study to the main hydro EIA. Para 3.26 has been amended together with the summary.

1.1.1.2.1 Socio-economic Environment

- The policy guidelines and implementation for compensation and resettlement have been set out in Vol 3 and are being closely followed despite problems with the initial valuation. As of the submission date of this report AESNP is undertaking individual negotiations in accordance with current Ugandan land tenure legislation. The agreement reached between the parties is both confidential and proprietary. A fair and adequate compensation will be paid in accordance with the Re-settlement and Compensation Plan
- A number of mitigation measures are proposed re-fisheries eg Vol 3 para 6.16 (fishermen compensation), para 7.19 (boat landings), para 7.58 (re-stocking), and paras 8.8 et seq in the EAP.

18/02 '99 21:53 TX/RX NO. 4797 P01

S.P. MOJUMBAR  
CHAIRMAN L.C.V.

It is a pity many people will be displaced and the environment will change to some extent under these circumstances I would still think it wise if possible for the project to be friendly to the environment by having it underground. This will for sure not disturb the present out look and though more expensive will provide both electricity and the beauty left undisturbed.

I refer to your letter in regard to the above matter and must thank you for the summary report.

ENVIRONMENTAL IMPACT ASSESSMENT

The Manager,  
AES Nile Power,  
JINJA.

DATE: 25th / 2 / 1999

YOUR REF:

OUR REF:

OFFICE OF THE CHAIRMAN LCV  
JINJA DISTRICT LOCAL COUNCIL  
P.O. BOX 92  
JINJA

THE REPUBLIC OF UGANDA



TELEPHONE NO: 043-214213  
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FAX 256-043-21287

19

MADE IN UGANDA

2 '99 13:41 FAX 0258 043 21287


**Jinja District Local Council**

- The question of alternative site layouts is addressed in Vol 2. Para 6.11 discusses bypassing Bujagali but this would increase costs by \$40 million and have potentially higher environmental impacts, as land take would be higher. A fully underground scheme is precluded (on cost grounds) by the geological conditions.

This is in response to your Environmental Impact Statement which was sent to me for comment. I have read the document very well. The report is covering all the aspects of Environmental concerns and I am satisfied with it. Therefore I recommend that it should be forwarded to NEMA for final consideration.

Yours sincerely

MUSOTA SOLOMON  
DISTRICT ENVIRONMENTAL OFFICER/MUKONO.



RE: ENVIRONMENTAL IMPACT STATEMENT (EIS):

The Project Manager  
AES Nile Pond.

Ref: EIA/2

4th February 1999

DEPARTMENT OF ENVIRONMENT  
MUKONO DISTRICT COUNCIL  
P.O. BOX 22  
MUKONO.

- Satisfied with report.

*Department of Environment Mukono District Council*

11/02 '98 14:35 TX/RX NO. 4740 P03

L. VAGRY SEDIVA  
RESIDENT DISTRICT COMMISSIONER  
MUKONO DISTRICT



I hope you will go through all the copies and finally approve the power project.

To date I have only been able to read just a small bit of the report because of time. The little I have read is okay on volume one. I am sure even the other parts I have not read are okay.

This is to acknowledge with thanks receipt of the EIA Final Report (Final draft) Environmental Impact Statement RIS sent to me on Friday, January 22nd, 1999 in three volumes.

**BUJAGALI HYDROPOWER PROJECT ENVIRONMENTAL IMPACT ASSESSMENT FINAL REPORT**

AES Nile Power  
P.O. Box 24401  
Kampala

11th February, 1999

OFFICE OF THE RESIDENT DISTRICT COMMISSIONER  
MUKONO DISTRICT  
P.O. BOX 268  
TEL: 20000  
MUKONO



FOR CORRESPONDENCE ON THIS SUBJECT PLEASE CONTACT MR. JMR/01

07

AES NILE POWER

7 99 13:41 FAX 02:55 043 20022 02:55 FAX 0258 043 20022

**RDC Mukono**

- Satisfied with what has been read.



temporary accommodation of the relocated.

transportation of the displaced families to new areas. It may require hiring vehicles.

Other issues which do not come out vividly in the report include:-

soon be addressed.

re-settlement issues). A National Policy on re-settlement will why AES Nile Power has been in consultation with us regarding does not handle the compensation part of it. (I suppose that is responsible for re-settlement of displaced persons, although it Refuges in the Office of the prime Minister, is fully Please be informed that the Department of Disaster Management and

**Institutional and Legal Framework:**

Observations made reflect on volume 3: Draft Resettlement and Compensation Plan.

If you consider them accordingly as pointed out in this response, they have not been very well reflected. I will be very grateful on some issues which should be included in the plan. However, during the meeting held with you on January 12th 1999 we agreed which was attributed to several other commitments.

1999 regarding the above. SORRY for the delay in responding, This is in response to yours ref. PD/EIA/001 dated 19th January, 1999

**BUJAGALI HYDROPOWER PROJECT ENVIRONMENTAL IMPACT ASSESSMENT DRAFT FINAL REPORT**

Mr. Peter O'Neill,  
AES Nile Power,  
P.O. Box 24401,  
KAMPALA.

22 February 1999

In any correspondence on this subject please quote No. \_\_\_\_\_

TELEPHONE: 2525725874/1251694  
2543672/0955525/252  
FAX: 61378 07M  
241139 07M  
OPM/DN/41

THE REPUBLIC OF UGANDA



OFFICE OF THE PRIME MINISTER,  
POST OFFICES BUILDING,  
KITANTE ROAD,  
P.O. BOX 341, KAMPALA, UGANDA

08/03 99 14:01 FAX

02

Hon. J. Frances Ruka,  
 MINISTER OF STATE FOR DISASTER PREPARADNESS

cc: 3rd Deputy Prime Minister/  
 Minister for Disaster Preparedness.

cc: Permanent Secretary,  
 Office of the Prime Minister.



- 1) We urge both the steering committee and implementation task force to be very effective on the ground in order to ensure that families which have opted for cash as compensation, do not fall victims of circumstances.
- ii) Copies of the tasks assigned to both committees should be availed to the department of Disaster Management for supervision and monitoring purposes.
- iii) A non aligned committee should be formed to monitor and evaluate the resettlement exercise.

Recommendation:

- Feeding the relocated families and time schedule.
- within what range of time are the displaced expected to have settled?

09/03 '99 14:01 FAX

03

- Office of the Prime Minister

Reference to the Department of Disaster Management was omitted in error. This has now been rectified in Chapter 4 of Volume 3 and the comments in this letter included.
- Displaced families will not be transported to new areas. Under the plans given in Volume 3 Chapter 6 escrow accounts will be established which will permit displaced persons to buy land locally. Many affected people own more than one plot which will allow them to move the unaffected piece of land. The socio-economic survey showed that most people wished to remain in the area because of their local ties.
- Given that re-location will be on a local scale temporary accommodation and feeding is not required. The process of re-settlement is quite different from that which might occur with disasters and refugees in that it is small scale, planned well in advance and involves relatively few families.
- The time requirement for re-settlement will largely be in the hands of the displaced persons. Those who have other plots to move to will be re-located quickly. Those who have to buy new plots may take more time but at least three months notice will have been given before they are required to move. Some families may wish to wait and buy back restored land in the borrow pit areas after construction is complete. In these cases permanent re-location will not occur for several years.
- We note the concerns of the Minister for Disaster Preparedness and point to Volume 3 Fig 7.1 in which the institutional arrangements are set out. As a result of the comments in the Minister's letter slight alterations have been made to this diagram to incorporate the Ministry as the only Government agency with extensive experience of re-settlement in Uganda – albeit under very different circumstances to this being proposed for this project.

Volume I - Main report Page 19 and 20 Executive Summary (The Summary of Impacts and Mitigation Measures). It would be better to describe the potential impacts as Impacts as a result of construction Phase and those during operation phase and thereby give proposed Mitigation measures during each phase of the project. This will help for quick reading especially for decision makers.

This arrangement for the type of impacts at each phase makes it easier for the monitoring plan/implementation of the mitigation measures which would have been proposed.

The mitigation measures have adequately been taken care by the report. It would be better if a mitigation plan is included especially showing who is supposed to do what, where, how and when (Time period). This can be tailored to the Volume 3 which has a resettlement and compensation plan.

The de-commissioning of the project works of how it will be done should clearly be depicted in the Draft Environmental Impact Statement (EIS).

An Environmental Impact Balance Sheet resulting from the major concerns, Quantifiable Impacts and unweighted Impact rating would have made it easier for decision making purpose.

The Town and Country Planning Act of declaring the proposed area as a planning area and the zoning/change of use of the area.

Impacts associated with land use around the proposed project i.e. possibility of urbanization i.e. trading centre.

RE: REVIEW OF THE BUJAGALI HYDROPOWER PROJECT - ENVIRONMENTAL IMPACT ASSESSMENT (DRAFT FINAL REPORT)

The Project Manager  
Nile Independence Power  
Kampala

27th January, 1999

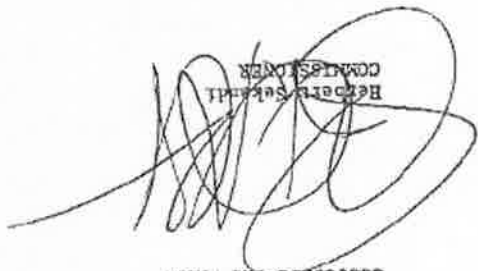
PHYSICAL PLANNING DEPARTMENT  
MINISTRY OF WATER, LANDS AND  
ENVIRONMENT,  
P.O. BOX 1911  
KAMPALA.

IN ANY CORRESPONDENCE ON THIS  
SUBJECT, PLEASE QUOTE NO.  
PPD/154/193/05



02/01 09 14:28 FAX

002

  
 Hossain Sheikh  
 COMMISSIONER

Potential impacts during construction of disposal of spoil seems not to have been predicted.

Another impact from Pollution and Public health problems resulting from inadequate provisions for additional refuse and sewerage disposal.

Generally the report is very voluminous. There is a need to summarise the three volumes into one document for easy reading.

We propose in the recommendation that procedures be established to keep the local committee informed of the full implications of the scheme and to ensure their full participation in implementing ameliorative measures.

Vegetation change - this is in respect to monitoring and additional surveys. The EIA should suggest more detailed vegetation surveys coupled with aerial photograph interpretation which could enable more accurate identification of areas of environmental degradation and thus, allow amelioration measures to be planned.

Unforeseen impacts occurring during construction, how will they be addressed and when?

- Unforeseen impacts will be dealt with by the environmental manager (para 8.56).
- Pre-project vegetation conditions are discussed in para 4.45 et seq., island protection in 7.57 and reservoir margins in para 7.35.
- The institutional arrangement for keeping local people involved are discussed in Section 7 of Volume 3 and in the Public Consultation and Disclosure Plan (Vol 2).
- The three volumes are summarise in the Executive Summary at the start of volume 1
- Pollution and public health are discussed in para 5.99, 6.8, 7.24 and are also addressed by the EPC (Engineer, Procure and Construct) contract.
- Disposal of spoil will be in the borrow pit areas.
- Effects on the local economy are discussed in para 5.31 et seq.
- A balance sheet of impacts is a tidy idea but difficult to apply. We have tried to show the main impacts in the summary table of the Executive Summary.
- Table 7.1 shows individual responsibilities for implementing the EAP and 8.56 et seq the institutional arrangements. Section 7 of volume 3 provides further detail on institutional arrangements for managing re-settlement and compensation.
- The summary of impacts table does in fact divide impacts between construction and operation but the column headings are unclear. Permanent effect column has been re-titled Permanent Effects During Operation.

*Physical Planning Department, Ministry of Water, Lands and Environment*

05/02 '99 09:28 TX/RX NO. 4840 P01

Very Sincerely,  
Seng H. S. Lum  
Chairman LC III water

always had maximum co-operation as we have it to you. Hoping for comments and I'll need my comments, I will arrive Land Bureau or counterpart, and you request that should you find a will something that is half-baked. I work I find it difficult to comment or settled its matter with Land Bureau, fact that your organization has not a lot to comment about but due to the 3/10/99. Now as regards the issue, I have some issue on 2/11/99 and a meeting your draft summary return regarding the I acknowledge having received

Re: LC III Demand Committee  
PROJECT MANAGER NP  
252 LC III/1001

04/02/99  
Office of the Chairman  
LC III Water Committee

09 10:41 FAX 0000 0000 0000 0000 0000 0000 0000 0000

*LC III Wakasi County*

- Only concern is for a satisfactory agreement on compensation



05/02 '99 13:52 TX/RX NO. 4648 P05

1

- You have only given us the Executive summary for review leaving us no chance to verify the details. We have just to believe some figures and statements quoted?
- For instance 77 species, 17 of which are aquatic and are not globally threatened. An Appendix should be provided for one to have a quick look to prove that non is endemic.
- Units- I believe are common units of measure however, I suggest a translation into Sq. Km or add the translation I ha = 10<sup>4</sup> M<sup>2</sup>. Fish was valued at 76 \$/M<sup>3</sup> yet different estimation states 5 times higher. Would you provide the method used to arrive at that figure in the appendices?
- Annual losses due to rafting at Bugajali have been quoted as US \$ 650,000 and US \$ 70,000. What method of analysis was used to arrive at these figures. In the mitigation no compensation is cited for these losses. Some of this has been Revenue to Tinja District Administration, how do you cater for this loss? Regarding abstractions, a table should be provided to define all of them because there are some which are used but not priority defined.
- What are the local valuation procedures for compensation? Many valuers ignore the future component and only consider the present value of resources. Has this been catered for adequately?
- Changes in water quality are mentioned and mitigation's suggested but where is the data on water quality?
- Why is stated that there will be a slight risk of Schistosomiasis? On what basis? Mitigation's must be clear.
- The level of malaria incidence due to the impoundment is not clearly projected.

COMMENTS

This is response to your letters of 21<sup>st</sup> January, 1999 & 3<sup>rd</sup> February, 1999 addressed to the me. I have read through the E.I.A. draft report & below are my comments.

REF: BUJAGALI HYDROPOWER PROJECT

Dear Sir,

THE PROJECT MANAGER  
AES NILE POWER  
PO BOX 24401  
NAIROBI

Yours faithfully,  
EVBH/EI/M

4 February, 1999

JINJA MUNICIPAL COUNCIL  
ENVIRONMENT DEPARTMENT  
P. O. BOX 720  
JINJA

TELEPHONE: 011-254-20004  
FAX: 011-254-20004  
PO BOX 20004



2001

2 '99 13:41 FAX 011-254-20004

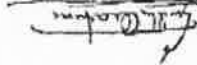
05/02 . 99 13:52 TX/RL NO. 1648 P06

2

The Resident District Commissioner - Jinja  
The Chief Administrative Officer - Jinja  
The Town Clerk - Jinja Municipal Council

SENIOR ENVIRONMENT OFFICER - JINJA

George Ostrange



- If those who are best on preserving the Bugagali site as source of revenue (which may increase in the future) will you be able alive to convince them that extra expense involved in the alternative site is higher than the losses to incurred at the Bugagali Falls? Please make it clear. This not agreement for the spirits but for the current economic value of Bugagali Falls. In the percentage quoted do you add the total number of Respondent sampled.
- Otherwise, this Executive summary suggest an assessment well done.

017

FOR MORE FORMS AND PILES CONTACT

08 01:30 FAX 0206 043 0002 07 29 13:41 FAX

- The economic value of the power generated will, on an annual basis, be many times greater than the estimated income lost from existing enterprises. AESNP estimate that current annual revenue to UEB from power generation from Bujagali will be about \$95 million. Power shortage is stifling Uganda's economy so that GDP growth is slowed, investment is delayed and tax income and foreign currency earnings are reduced. The longer the power shortages prevail the greater will be the effect of this negative economic impact.
- Malaria is discussed in para 5.159 and 6.45 (mitigation).
- Schistosomiasis is discussed in para 4.78 et seq, 5.153, 6.40, 8.11.
- Water quality data are presented in table 4.4
- Chapter 6 of Volume 3 sets out the local valuation procedures.
- Abbreviations are listed at the start of the main report.
- Rafting valuation is discussed in para 4.260, 4.282 and Table 5.19 Also see comments above re NRE & Adrift.
- Table 4.11 and para 4.190 discuss the valuation of fisheries.
- Comment noted
- Appendix B of Vol 1 gives full details of species identified.

**Jinja Municipal Council**



**Directorate of Water Development, Jinja**

- Sanitation facilities are discussed in para 7.16 et seq.

REF: FD/EIA/001 RESPONSE

I would like to appreciate the work which you did in conjunction with your independent Consultants W.S. Atkins International (W.S.A.I) in the process of concluding the Environmental Impact Study and the Environmental Impact Report, which was submitted to the final Environmental Impact Assessment Report, which I received on the 21st January 1999. I have reviewed the three Volumes of the EIA report and I am satisfied with all of them. Although, there is no Ministry responsible for re-settlement and Compensation and no policy documents or guidelines for resettlement do exist as stated in Volume 3 of the EIA report, I would like us to cooperate so that, that exercise is fairly concluded.

Despite of the new which exists now, which has contributed to the delay in the Compensation process, I would like to appreciate the work which you did in conjunction with your independent Consultants W.S. Atkins International (W.S.A.I) in the process of concluding the Environmental Impact Study and the Environmental Impact Report, which I received on the 21st January 1999. I have reviewed the three Volumes of the EIA report and I am satisfied with all of them. Although, there is no Ministry responsible for re-settlement and Compensation and no policy documents or guidelines for resettlement do exist as stated in Volume 3 of the EIA report, I would like us to cooperate so that, that exercise is fairly concluded.

05/02 '99 13:21 TX/RX NO. 4852 PO1

MARTIN PASHI COUNCIL  
 P.O. Box 4629  
 Bulbake  
 2nd FEB 1999.

THE PROJECT MANAGER  
 AES NILE POWER  
 P.O. Box 24401  
 PLOT 37 KIRAMEB  
 KIRAMEB

DEAR SIR,

05/02 '99 15:21 TX/RX NO. 4652 P02

are in favour of the project and indeed dislike  
 the waste water effluent.  
 The delay in the compensation has been  
 contributed by the exagoration made in the  
 valuation exercise, therefore to speed up  
 the process, make sure that the re-valuation  
 exercise is done quickly. This will help to  
 curb the autogonistic reactions prevailing  
 at the moment.  
 I am very much optimistic to see all the  
 positive results the project is to bring in  
 our area come, as stipulated in the EIA file  
 draft report.  
 Thank you very much for your time and  
 consideration in respect of this matter and  
 your looking forward for your usual  
 cooperation.  
 Yours Sincerely  
 Ahmed El Agha  
 ASSISTANCE COMRADE

Ahmed El Agha  
 ASSISTANCE COMRADE  
 P.O. BOX 1000  
 CAIRO, EGYPT  
 23/02/99  
 RECEIVED  
 X DATE  
 X TIME  
 X

*Malindi Parish Council*

- Satisfied with report
- Main concern is over compensation explain and reference as above