



September 26, 2024

Dr. Akankwasah Barirega,
The Executive Director,
National Environment Management Authority (NEMA),
Kampala (U).

Dear Sir,

RE: STOP SECOND OIL RIG IN MURCHISON FALLS NATIONAL PARK

Greetings from the undersigned signatories including hoteliers, tour and travel operators, small-scale farmers and fisherfolk.

First and foremost, allow us to extend our deepest gratitude to you and your office for your efforts towards ensuring sustainable management of the environment.

We have seen an invitation that NEMA sent to hoteliers and tour operators operating within and around Murchison Falls National (MFNP) inviting them for a stakeholder engagement that took place on August 28, 2024 at HB Hotel in Buliisa district.

Through the invitation, NEMA indicated that the authority wanted to collect stakeholder views before making a final decision on an application made by TotalEnergies E&P Uganda (TEPU) to introduce a second oil rig in MFNP.

We take this opportunity to appreciate NEMA for undertaking the important stakeholder consultation and through this letter, we share our views on the introduction of a second oil rig in MFNP.

We hope that NEMA will take these views into consideration while making its final decision.

OUR VIEWS

TEPU is already operating an oil rig, the SINOPEC 1503 Jobiri rig, in MFNP under the Tilenga oil project. Operation of the rig has had some negative impacts and we are afraid that the introduction of a second oil rig in the park could escalate these impacts, which would negatively impact our livelihoods. Some of these impacts and threats are discussed hereunder.

- (a) **Threats to wildlife, especially elephants:** Uganda's tourism industry is eco-based with the country selling itself as the great ape capital of the world, and one where tourists can see the big 5 that include elephants, lions, leopards, buffaloes and others. The tourists that visit Uganda and contribute millions of dollars to the economy while supporting our livelihoods come to see the big 5, and other wildlife. Unfortunately, oil exploitation activities in Murchison Falls National Park are a danger to this wildlife. Already, elephants which were abundant in the park and are called the landlords of Murchison Falls NP, are already being displaced. Available information shows that vibrations from the existing oil

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rig in the park are negatively impacting the elephants, displacing them¹. It is true indeed that when some of us have taken visitors to the park, it has been hard to spot elephants, which was not the case before oil activities increased in the park. A second oil rig could prove catastrophic, which would hurt our livelihoods, and the Ugandan economy.

- (a) **Increasing conservation pressure on lions, other cats:** Lions, leopards and other cats are mesmerizing creatures. A number of the visitors that we receive are overjoyed when they see them. MFNP is one of the parks where the above big and other small cats can be seen. Indeed, the park is home to over 300 lions², which is the highest population in any of Uganda's parks. Queen Elizabeth National Park, which has the second highest number of lions in Uganda, has a population of over 100². Conservationists have raised alarms over the declining population of lions, identifying factors such as poaching, habitat loss and others as affecting the lions. The existing oil rig in MFNP has also been identified as a conservation threat to lions. The light pollution from the rig, which can be spotted at a distance of over 13.9 kilometers away at night, is a risk to nocturnal cats such as lions. If the conservation pressure on lions increases, then our livelihoods are at stake.
- (b) **Sightings of bucks threatened:** Various antelopes are abundant in Uganda. They are also our country's pride so much that the Uganda Kob is one of the emblems of our country. Antelopes including the Uganda Kob, oribi, waterbuck, reed buck and others are either abundant or exist in MFNP. Some of these antelopes, especially the bucks, are rare to see, because they are shy. When tourists get the opportunity to view them, they are elated! Little wonder then that of the country's national parks, MFNP receives the highest number of visitors. In 2023 for instance, the park received 141,335³ visitors, or 36.4% of all the visitors that visited the country's parks. Indeed, of all the country's parks, MFNP received the highest number of visitors between 2019 and 2023⁴. Oil activities in the park are a threat to our livelihoods as they increase the human population in the park, which could make the shy bucks hide in enclaves where they could be hard to be spotted by the tourists.
- (c) **Climate change impacts:** Climate change has had catastrophic impacts on MFNP. Home to several water bodies including Lake Albert, River Nile, and the Murchison Falls-Albert Delta Ramsar Wetland, the park is at risk of climate change impacts including flooding. Indeed, the 2019 floods that saw water levels in Lake Victoria increasing led to flooding in the park. Consequently, habitats for hippopotami and breeding grounds for wildlife including crocodiles⁵, the kingfisher bird and others were affected. Reports today indicate

¹ Daily Monitor: <https://www.monitor.co.ug/uganda/news/national/oil-exploration-endangers-wildlife-tourism-in-murchison-falls-park-report-4720402#story>

² Daily Monitor: <https://www.monitor.co.ug/uganda/news/national/drop-in-number-of-lions-alarms-conservationists-4335180>

³ https://www.tourism.go.ug/files/ugd/1e6d1c_5ae50ebe0df246b38dd9dead4356ad1b.pdf

⁴ Ministry of Tourism, Wildlife and Antiquities (2024); *Statistical abstract: Tourism trends and statistics 2024*

⁵ The Elephant: <https://theelephant.co.ug/climate-changeflooding-affecting-reproduction-rate-of-the-nile-crocodiles-at-murchison-np/>

that the populations of hippopotami⁶ and crocodiles⁴ in the park have drastically reduced due to the climate change-induced flooding. The pursuit of oil and gas exploitation in Uganda threatens to worsen climate change, and therefore our livelihoods. Worth noting is that under Uganda's 2022 Updated National Determined Contributions (NDCs), ecosystems, on which tourism depends, have been classified as having a risk and vulnerable rating of 5. This is the highest score. To protect tour and travel operators, it is imperative that Uganda and other countries take climate action.

(d) Threat to fishing activities: The ongoing oil developments within MFNP are a huge risk to fishing activities on Lake Albert. This is because the development of wellpads in the park are a threat to the Murchison Falls-Albert Delta Ramsar site, a recognised wetland of international importance. This site is extremely critical not only as an Important Bird Area (IBA) and a Key Biodiversity Area (KBA) that is home to endangered bird species like the shoebill, but also as a spawning site for the Lake Albert fisheries. These fisheries sustain livelihoods. Birds in MFNP are also an important tourist attraction. Worth noting is that the park is home to over 451 bird species⁷.

(e) Local and national economic concerns: The Uganda Bureau of Statistics (UBOS) puts the number of people that were employed in Uganda's tour and travel industry in 2019 at 1,559,147⁸ workers. This is equivalent to 14.7% of total employment in Uganda. Of the above workers, 1,059,300 are female. Our livelihoods and those of the above workers are at risk due to oil exploitation activities in MFNP. Moreover, the tourism industry has a multiplier effect on the economy with women, youth and others being employed in the crafts industry. Local and other investors in Buliisa, Masindi, Nwoya and other districts around MFNP have also set up hotels that are dependent on tourism in the long-term because while oil and gas activities are expected to last about 25 years, tourism, which earned the country USD 1.28 billion in 2023⁹ can last forever if wildlife is conserved.

CONCLUSION

Given the above concerns, we request NEMA to stop the construction of a second oil rig in MFNP. In addition, NEMA needs to conduct an audit of compliance to the Environmental Social Impact Assessment (ESIA) commitments for the Tilenga oil project and publicly communicate the audit findings. The above request stems from community concerns including increased elephant-human conflicts, flash floods and others that communities in Buliisa district attribute to the Tilenga oil project activities.

⁶ National Geographic: <https://www.nationalgeographic.com/animals/article/hippos-poached-in-ugandas-national-parks>

⁷ About Murchison Falls National Park: <https://www.murchisonfallsparkuganda.com/information/birds-of-murchison-falls-national-park/>

⁸ https://www.ubos.org/wpcontent/uploads/publications/03_2023Tourism_Supply_Employment_Investment_PP_T.pptx

⁹ Ministry of Finance:

<https://budget.finance.go.ug/sites/default/files/National%20Budget%20docs/Budget%20Speech%20FY%202024-25.pdf>

We thank you for your attention to this matter and we look forward to a positive response.

To respond to this letter, you may contact our main signatory, Jude Ssemmanda by emailing: ssemmandajude@gmail.com

SIGNATORIES THAT INCLUDE HOTEL OWNERS, FISHERFOLK, SMALL-SCALE FARMERS & TOUR OPERATORS

No	Names	District/Country
1.	Wandera Kennedy	Buliisa
2.	Kahwa Cristopher	Buliisa
3.	Kisembo Bright	Buliisa
4.	Uyirwoth Benard	Buliisa
5.	Kasangaki Devid	Buliisa
6.	Agaba Kamali	Buliisa
7.	Bikara Doreen	Buliisa
8.	Buguma Ezra	Buliisa
9.	Mugisa Denis	Buliisa
10.	Kunihira Merry	Buliisa

11.	Tubasiywa Sam	Buliisa
12.	Mugenzi Robert	Buliisa
13.	Tuwesige Moses	Buliisa
14.	Businge Geoffrey	Buliisa
15.	Byakagaba Geoffrey	Buliisa
16.	Wapokurwa Kennedy	Hoima
17.	Ajuruva Fred	Hoima
18.	Koturach Margret	Hoima
19.	Omirambe Charles	Hoima
20.	Omirambe Moses	Hoima
21.	Pirwoth John	Hoima
22.	Alithum Deogratus	Hoima
23.	Uryek Denis	Hoima
24.	Komakech Albert	Hoima

25.	Biwaga Janifer	Hoima
26.	Asimemwe Gidio	Hoima
27.	Ongiu Jackson	Hoima
28.	Ocan Patrick	Hoima
29.	Ochaki Julius	Hoima
30.	Owachi Robert	Hoima
31.	Nyayenga Moreen	Hoima
32.	Obeling Gift	Hoima
33.	Apio Anitar	Hoima
34.	Birungi Sarah	Hoima
35.	Ofoi Jemsi	Hoima
36.	Oyirwoth Martain	Hoima
37.	Oweki Majunga	Hoima
38.	Sunday Ivan	Hoima

39.	Odaga Moses	Hoima
40.	Ofoi Kabila	Hoima
41.	Ngabirano Emmanuel	Kakumiro
42.	Senkima Francis	Kakumiro
43.	Atukwase Oscar	Kakumiro
44.	Kabahagunzi Lilian	Kakumiro
45.	Rubiito Fred	Kakumiro
46.	Nyakojo Venansio	Kakumiro
47.	Musiimeta Racheal	Kakumiro
48.	Niwamanya Rosset	Kakumiro
49.	Nyakato Oliver	Buliisa
50.	Npairwe Frederick	Buliisa
51.	Makandi Kennedy	Buliisa
52.	Tumusiime Gideon	Buliisa

53.	Nyakalaya Mercy	Buliisa
54.	Kiiza Jonan	Buliisa
55.	Nyagoma Monica	Buliisa
56.	Balikuha Geoffrey	Buliisa
57.	Birungi Giladis	Buliisa
58.	Katulinde Irene	Buliisa
59.	Tibemanya Nelson	Hoima
60.	Aliganyira Wallen	Hoima
61.	Kyarisiima Joyce	Hoima
62.	Mugisha Nelson	Kikuube
63.	Tushabe Anna	Hoima
64.	Musigunzi Sammuell	Kikuube
65.	Bithum Moris	Hoima
66.	Ozele Geodfrey	Hoima

67.	Kakura Roben	Hoima
68.	Tamara Leonard	Hoima
69.	Tugume Racheal	Hoima
70.	Obeling Emmanuel	Hoima
71.	Amutuhaire Elizebeth	Hoima
72.	Muhibise Edward	Hoima
73.	Musiimeta Miria	Hoima
74.	Masiko Alex	Kikuube
75.	Mbabazi Benjamin	Kakumiro
76.	Ochokdgthu Julius	Hoima
77.	Kobusinge Sifa	Uganda
78.	Byamukama Lakeri	Uganda
79.	Alirach Cynthia	Uganda
80.	Katusabe Nicholas	Uganda

81.	Kaahwa Stephen	Uganda
82.	Mungureki Janeifer	Uganda
83.	Abigaba Innocent	Uganda
84.	Watum David	Uganda
85.	Tumusiime Rogers	Uganda
86.	Wandera Kennedy	Uganda
87.	Benedict Ntale	Kampala, Uganda
88.	Zawedde Annet Mary	Kampala, Uganda
89.	Jude Ssemanda	Kampala, Uganda
90.	Charles Basaliza	Buliisa, Uganda

CC

- Minister of Water and Environment
- Minister of Tourism, Wildlife and Antiquities
- The Executive Director, Petroleum Authority of Uganda (PAU)
- The Executive Director, Uganda Wildlife Authority (UWA)
- The CEO, TotalEnergies E&P (U) B.V.
- The CEO, CNOOC (U) Ltd

