

## EAST AFRICAN CRUDE OIL PIPELINE PROJECT (UGANDA)

### Resettlement Action Plan (RAP) Implementation External Monitoring and Evaluation



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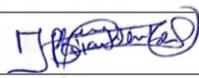
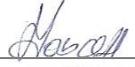
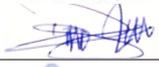
## Project Details

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Consultant	GMT Consults LTD
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RAP Implementation Audit scope	All RAP Implementation activities up to 28 October 2024
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## List of Acronyms

AA	EACOP Uganda RAP Implementation Audit Area
AGIs	Above-Ground Installations
ATWs	Alternative Temporary Work Spaces
CA	Compensation Agreement
CAP	EACOP Uganda RAP Implementation Corrective Action Plan
CDO	Community Development Officer
CFR	Central Forest Reserve
CGV	Chief Government Valuer
CLO	Community Liaison Officer
CLO	Community Liaison Officer
CMP	Contractor Management Plans
CNOOC	China National Offshore Oil Corporation
CUL	CNOOC Uganda Limited
CSOs	Civil Society Organisations
CSCO	Civil Society Coalition on Oil and Gas
DCR	District Compensation Rate
DIT	Directorate of Industrial Training
DLB	District Land Board
DCCs	District Consultative Committees
EACOP	East African Crude Oil Pipeline
EASP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
EB/CA	Entitlement Briefings and Compensation Agreement
FGD	Focus Group Discussions
FID	Final Investment Decision
GBV	Gender Based Violence
GCALA	Guidelines for Compensation Assessment under Land Acquisition
GIS	Geographic Information System
GM	Grievance Mechanism
GMC	Grievance Management Committee
GMM	Grievance Management Mechanism
GMT	GMT Consults LTD
GNSS	Global Navigation Satellite System
GoU	Government of Uganda
GoT	Government of Tanzania
GPS	Geographical Positioning System
HGA	Host Government Agreement
H3SE	Health, Safety, Security, Social, and Environment
IBLAC	Independent Biodiversity and Livelihoods Advisory Committee
IEC	Information, Education, and Communication
IFC	International Finance Corporation
IFC PS	IFC Performance Standards on Environmental and Social Sustainability
KII	Key Informant Interview
KIP	Kabalega Industrial Park
Km	Kilometres
KP	Kilometre Point

KPI	Key Performance Indicators
LC1	Local Council One
LCV	Local Council Five
LC III	Local Council Three
LESC	Lenders' Environmental and Social Consultant
LoA	Letters of Administration
LR	Livelihood Restoration
LRP	Livelihood Restoration Plan
LSOC	Land & Social
MCPY	Main Camp & Pipe Yards
M&E	Monitoring and Evaluation
MEMD	Ministry of Energy and Mineral Development
MLBV	Main Line Block Valves
MLHUD	Ministry of Labour, Housing and Urban Development
MZOs	Ministry Zonal Offices
NEMA	National Environment Management Authority
NFA	National Forestry Authority
NGO	Non-Governmental Organisation
NIN	National Identification Number
NLIS	National Land Information System
NTV	Notice To Vacate
NWSC	National Water and Sewerage Corporation
PAs	Priority Area(s)
PACs	Project Affected Communities
PAH	Project Affected Household
PAI	Project Affected Institution
PAP	Project Affected Person
PAU	Petroleum Authority of Uganda
PDP	Physically Displaced Project Affected Person
PPL	Pipeline
PPL RoW	Pipeline Right of Way
PwD	People with Disability
RAP	Resettlement Action Plan
RTK	Real Time Kinematic
SoW	Scope of Work
TEAM B.V.	Total East Africa Midstream B.V.
TEPU	Total Exploration and Production Uganda
TS	Transitional Support
UBOS	Uganda Bureau of Statistics
UETCL	Uganda Electricity Transmission Company Limited
ULC	Uganda Land Commission
UNOC	Uganda National Oil Company
UNRA	Uganda National Roads Authority
URC	Uganda Railways Corporation
URL	Unviable Residual Land
VPP	Vulnerable Persons Plan
VR	Valuation Report
WB	World Bank

## Glossary of Terms

Term	Definition
<b>Asset Survey</b>	A detailed survey of all land, buildings, trees, and crops within the Project Area, recording ownership, construction, and crop details, measurements, photographs, and Geographical Positioning System (GPS).
<b>Community</b>	A group of individuals broader than the household, who identify themselves as a common unit due to recognised social, religious, economic, or traditional government ties, or through a shared locality.
<b>Compensation</b>	Payment in monetary or in-kind for an asset or a resource that is acquired, or affected by a project.
<b>Customary Tenure</b>	<p>Section 3(1) of the Land Act Cap 227 as amended, defines customary tenure as a form of tenure:</p> <ul style="list-style-type: none"> <li>• Applicable to a specific area of land and a specific description or class of persons</li> <li>• Subject to Section 27, governed by rules generally accepted as binding and authoritative by the class of persons to which it applies</li> <li>• Applicable to any persons acquiring land in that area in accordance with those rules</li> <li>• Subject to Section 27, characterized by local customary regulation</li> <li>• Applying local customary regulation and management to individual and household ownership, use and occupation of, and transactions in, land</li> <li>• Providing for communal ownership and use of land</li> <li>• In which parcels of land may be recognised as subdivisions belonging to a person, a family, or a traditional institution</li> <li>• Owned in perpetuity.</li> </ul> <p>Section 27 of the Land Act Cap 227, as amended, protects the rights of women, children, and disabled persons regarding customary land. It states that any decision in respect to land held under customary tenure — whether in respect to land held individually or communally — shall be in accordance with the customs, traditions, and practices of the community concerned, except when a decision which denies women or children or persons with a disability access to ownership, occupation or use of any land, or imposes conditions which violate articles 33, 34, and 35 of the</p>

Term	Definition
	Constitution on any ownership, occupation, or use of any land shall be null and void.
<b>Displacement</b>	All the people affected by a Project through land acquisition, relocation, or loss of incomes and includes any person, household, firms, or public or private institutions who, as a result of a Project, would have their (i) standard of living adversely affected; (ii) right, title, or interest in all or any part of a house, land (including residential, commercial, agricultural, plantations, forest, and grazing land), or any other moveable or fixed assets acquired or possessed, in full or in part, permanently or temporarily adversely affected; (iii) business, occupation, place of work, residence, habitat, or access to forest or community resources adversely affected, with or without displacement or (iv) loss of access to fishing/ hunting grounds.
<b>Economic Displacement</b>	Loss of income streams or means of livelihood caused by land acquisition or obstructed access to resources (land, water, or forest) resulting from the construction or operation of a Project or its associated facilities. For example, economic displacement can result from loss of access to farmland and can occur without physical displacement occurring.
<b>Eligible Crops</b>	Crops planted within the Project Area by Project-Affected People before the Entitlement Cut-Off Date and that are eligible for compensation.
<b>Eligible Land</b>	The land (cropped and fallow, agricultural and communal) within the Project Area that is affected by the Project.
<b>Eligible Structures</b>	The buildings and structures constructed within the Project Area before the Entitlement Cut-Off Date and that are eligible for compensation.
<b>Eligibility</b>	Entitlement to compensation and assistance due to displacement impacts resulting from Project required land acquisition, revocation of rights and/ or the expropriation of property
<b>Entitlements</b>	Compensation offered to persons, households, groups, and/or communities physical and/or economically displaced by the Project. This includes (but is not limited to): financial compensation, the right to participate in livelihood restoration programs, housing, service provision, transport assistance, and other short-term assistance required to move from one site to another
<b>Entitlement Cut-off Date</b>	The date established as the deadline for entitlement to compensation. Persons occupying the Project Area after the Entitlement Cut-Off Date are not eligible for compensation and/or resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees, and woodlots)

Term	Definition
	established after the Entitlement Cut-Off Date are not compensated.
<b>Freehold Tenure</b>	<p>Section 3(2) of the Land Act Cap 227, as amended, defines Freehold Tenure as a form of tenure deriving its legality from the Constitution and its incidents from the written law which:</p> <ul style="list-style-type: none"> <li>• Involves the holding of registered land in perpetuity or for a period less than perpetuity which may be fixed by a condition</li> <li>• Enables the holder to exercise, subject to the law, full powers of land ownership, including but not necessarily limited to: <ul style="list-style-type: none"> <li>○ Using and developing the land for any lawful purpose</li> <li>○ Taking and using any and all produce from the land</li> <li>○ Entering into any transaction in connection with the land, including, but not limited to selling, leasing, mortgaging or pledging, subdividing, creating land rights and interests for other people, and creating land trusts</li> <li>○ Disposing of the land to any person by will.</li> </ul> </li> </ul> <p>Section 3(3) of the Land Act Cap 227 as amended states that, to avoid doubt, a freehold title may be created — which is subject to conditions, restrictions, or limitations which may be positive or negative in their application — and is applicable to any of the incidents of the tenure.</p>
<b>Full Replacement Cost</b>	The market value of assets plus transaction costs, where depreciation of structures and assets is not taken into account
<b>Highest and Best Use</b>	The reasonable probable and legal use of vacant land or improved property which is physically possible, appropriately supported, financially feasible and that results in the highest value.
<b>Household</b>	A person, or group of persons living together, in an individual house or Compound, who share cooking and eating facilities, and form a basic socio-economic and decision-making unit.
<b>Involuntary Resettlement</b>	Resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or means of livelihood) as a result of project-related land acquisition or restriction of access to natural resources. Resettlement is considered involuntary when affected individuals or communities do not have the right to

Term	Definition
	<p>refuse land acquisition that result in displacement. This occurs in cases of:</p> <ul style="list-style-type: none"> <li>• lawful expropriation or restrictions on land use based on eminent domain; and</li> <li>• negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fail.</li> </ul>
<p><b>Kibanja Landholder</b></p>	<p>A Kibanja Landholder is either a bona fide or lawful occupant. Section 29(1) of the Land Act Cap 227 as amended, defines a lawful land occupant as:</p> <ul style="list-style-type: none"> <li>• A person occupying land by virtue of the repealed: <ul style="list-style-type: none"> <li>○ Busuulu and Envujjo Law of 1928</li> <li>○ Toro Landlord and Tenant Law of 1937</li> <li>○ Ankole Landlord and Tenant Law of 1937</li> </ul> </li> <li>• A person who entered the land with consent of the registered owner, and includes a purchaser; or</li> <li>• A person who occupied land as a customary tenant but whose tenancy was not disclosed or compensated for by the registered owner at the time the leasehold certificate of title was acquired.</li> </ul> <p>Section 29(2) of the Land Act Cap 227 as amended defines a bona fide land occupant as a person who, before the enactment of the Constitution:</p> <ul style="list-style-type: none"> <li>• Had occupied and utilised or developed any land unchallenged by the registered owner or agent of the registered owner for twelve years or more</li> <li>• Had been settled on land by the Government or an agent of the Government, which may include a local authority.</li> </ul> <p>In Section 29(5) of the Land Act Cap 227, any person who has purchased or otherwise acquired the interest of the person qualified to be a bona fide occupant under the Land Act shall be taken to be a bona fide occupant.</p> <p>A Kibanja Landholder is a tenant of a landlord to whom s/he is expected to pay rent. A Kibanja Landholder can also lodge a caveat where they have reason to suspect that the registered landowner intends to enter a land transaction, which will affect their rights and interests as per Section 139 of the Registration of Titles Act.</p> <p>A Kibanja Landholder must obtain the consent of his/her landlord before the sale of his/her interest and must give</p>

Term	Definition
	his/her landlord first priority as per the Land Amendment Act 2010.
<b>Land</b>	Refers to agricultural and/or non-agricultural land whether temporary or permanent, and which may be required for the Project.
<b>Landowner</b>	Is a person who has lawful possession over a piece of land. The Landowner may or may not own structures and crops on the land.
<b>Land Acquisition</b>	The taking of or alienation of land, buildings, or other assets thereon for purposes of a Project under eminent domain.
<b>Leasehold Tenure</b>	<p>Leasehold Tenure is:</p> <ul style="list-style-type: none"> <li>• Created either by contract or by application of the law</li> <li>• A form under which the landlord or lessor grants the tenant or lessee exclusive land possession, usually for a period defined and in return for a rent, and</li> <li>• A land holding providing the tenant with security of tenure and a proprietary interest in the land.</li> </ul>
<b>Livelihood Programs</b>	Programs intended to replace or restore quality of life indicators and maintain or improve economic security for Project-Affected People through provision of economic and income-generating opportunities, which may include activities such as training, agricultural production and processing and small and medium enterprises.
<b>Mailo Tenure</b>	<p>The Mailo Land Tenure System is a land ownership system introduced by the British in 1900 under the Buganda Agreement. Prior to the 1975 Land Reform Decree, Mailo land was owned in perpetuity by individuals and by the Kabaka. All Mailo land parcels have title deeds.</p> <p>Section 3(4) of the Land Act Cap 227 as amended defines Mailo Land Tenure as a form of tenure deriving its legality from the Constitution and its incidents from the written law which, among other things:</p> <ul style="list-style-type: none"> <li>• Involves holding registered land in perpetuity</li> <li>• Permits the separation of land ownership from development ownership on land by a lawful or bona fide occupant, and</li> <li>• Enables the holder, subject to the customary and statutory rights of those persons lawfully or bona fide in occupation of the land at the time the tenure was created — and their successors in title — to exercise all ownership powers of the owner of land held of a freehold title set out in section 3(2) &amp; (3) of the Land Act Cap 227 as amended and</li> </ul>

Term	Definition
	subject to the same possibility of conditions, restrictions, and limitations, positive or negative in their application, as are referred to in those sub-sections.
<b>Physical Displacement</b>	Loss of shelter and assets resulting from the acquisition of land associated with a Project that requires the affected person(s) to move to another location.
<b>Physically Displaced Household</b>	Households who normally live in the Project Area and who will lose access to shelter and assets resulting from the acquisition of land associated with the Project that requires them to move to another location.
<b>Project</b>	Planning and execution of activities for the implementation of the East African Crude Oil Pipeline (EACOP).
<b>Project Area</b>	The area or 'footprint' of land affected by activities to be undertaken in the implementation of the East African Crude Oil Pipeline (EACOP).
<b>Project Affected Household (PAH)</b>	All members of a household, whether related or not, operating as a single socio-economic and decision-making unit, who are affected by a Project.
<b>Project Affected Persons (PAPs)</b>	<p>Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), perennial crops and trees, or any other fixed or movable asset, either in full or in part, permanently or temporarily.</p> <p>These people may have their:</p> <ul style="list-style-type: none"> <li>• Standard of living adversely affected, whether or not the PAP must move to another location</li> <li>• Right, title, investment in any house, land (including premises, agricultural and grazing land) or any other fixed or movable asset temporarily or permanently possessed or adversely affected</li> <li>• Access to productive assets temporarily or permanently adversely affected; or business, occupation, work or place of residence or habitat adversely affected.</li> </ul>
<b>Relocation</b>	A process through which physically displaced households are provided with a one-time lump sum compensation payment for their existing residential structures and move from the Project Area.
<b>Replacement Cost</b>	A method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement.

Term	Definition
	<p>Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs.</p> <p>Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labour for construction of structures or other fixed assets, plus transaction costs.</p> <p>Transaction costs include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons.</p> <p>With regard to land and structures, International Finance Corporation (IFC) defines “replacement costs” as follows:</p> <ul style="list-style-type: none"> <li>• <b>Agricultural Land:</b> The market value of land of equal productive use or potential located in the vicinity of the affected land, plus the cost of preparation to levels similar to or better than those of the affected land, plus the cost of any registration and transfer taxes</li> <li>• <b>Land in Urban Areas:</b> The market value of land of equal size and use, with similar or improved public infrastructure facilities and services preferably located in the vicinity of the affected land, plus the cost of any registration and transfer taxes</li> <li>• <b>Household and Public Structures:</b> The cost of purchasing or building a new structure, with an area and quality similar to or better than those of the affected structure, or of repairing a partially affected structure, including labour and contractors’ fees and any registration and transfer taxes. In determining the replacement cost, depreciation of the asset and the value of salvage materials are not taken into account, nor is the value of benefits to be derived from the Project deducted from the valuation of an affected asset.</li> </ul>
<b>Resettlement</b>	A process through which physically displaced households are provided with replacement land and or replacement house. Resettlement includes initiatives to restore and improve the living standards of those being resettled.
<b>Resettlement Action Plan (RAP)</b>	The document in which a Project Proponent specifies the procedures it will follow and the actions it will take to mitigate adverse effects, compensate losses, and restore livelihoods affected by land acquisition.
<b>Resettlement / Relocation Assistance</b>	Support provided to people who are displaced by a Project. Assistance may include transportation, food, shelter, and

<b>Term</b>	<b>Definition</b>
	social services provided to affected people during their relocation. Assistance may also include monetary allowances that compensate affected people for the inconvenience associated with resettlement and defray the expenses of transitioning to a new locale, such as moving expenses and lost workday allowances.
<b>Socio-economic Survey</b>	A detailed socio-economic survey of all households within the Project Area, recording detailed demographic and socio-economic data at the household and individual level.
<b>Stakeholders</b>	Any and all individuals, groups, organisations, and institutions interested in and potentially affected by a Project or having the ability to influence a Project.
<b>Tenant</b>	A person who lives in a structure belonging to another, regardless of whether they pay rent or not.
<b>Vulnerable Persons</b>	<p>People who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status, may be more adversely affected by resettlement than others and who may be limited in their ability to re-establish themselves or take advantage of resettlement assistance and related development benefits.</p> <p>This group may include people living below the poverty line, the landless, the elderly, disabled, women, and children-headed households, ethnic minorities, communities dependent on natural resources or other displaced persons who may not be protected through national land compensation or land titling legislation.</p>

## Executive Summary

This report is an external monitoring and evaluation audit of the implementation of the East African Crude Oil Pipeline (EACOP) Project's Resettlement Action Plan (RAP) in Uganda.

The EACOP Project<sup>1</sup> is a 1,443-kilometre-long cross-border pipeline — of which 296 km will be in Uganda — running from Kabaale in Hoima District, Uganda, to Chongoleani in Tanga Region, Tanzania. The pipeline route passes through ten (10) Districts in Uganda, namely Hoima, Kikuube, Kakumiro, Kyankwanzi, Mubende, Gomba, Sembabule, Lwengo, Rakai, and Kyotera, traversing 171 villages.

The objective of the audit is to assess all RAP implementation activities and their compliance with relevant standards, including, but not limited to, the IFC Performance Standards and Ugandan legislation. The report presents key observations and findings, identifies key gaps and areas for improvement, and presents a corrective action plan to address these issues.

The main International Finance Corporation Performance Standards (IFC PS) on Environmental and Social Sustainability (2012) applicable to this Audit are:

### 1. IFC PS1 - Assessment and Management of Environmental and Social Risks and Impacts

This PS highlights the importance of managing environmental and social performance as well as mitigating associated risks.

The key objectives of this standard that are relevant to this Project are to:

- Identify and evaluate environmental and social risks and impacts of the project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, and, where residual impacts remain, compensate/offset for risks and impacts to workers, affected communities, and the environment.
- Promote improved environmental and social performance through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them, and to ensure that relevant environmental and social information is disclosed and disseminated.

### 2. IFC PS5: Land Acquisition and Involuntary Resettlement

IFC PS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land.

Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) as a result of project-related land acquisition and/or restrictions on land use. Resettlement is considered involuntary when

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<sup>1</sup> More information on system description, construction sequence, pipeline integrity can be found at the EACOP website pages <https://eacop.com/overview/>

affected individuals or communities do not have the right to refuse land acquisition that result in displacement.

Para 2 states that unless properly managed, involuntary resettlement may result in long-term hardship and impoverishment for the affected communities and persons, as well as environmental damage and adverse socio-economic impacts in areas to which they have been displaced. For these reasons, involuntary resettlement should be avoided. However, where involuntary resettlement is unavoidable, it should be minimized and appropriate measures to mitigate adverse impacts on displaced persons and host communities should be carefully planned and implemented.

The specific objectives of PS5 are to:

- avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs;
- avoid forced eviction;
- anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition and/or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that all resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected;
- improve, or restore, the livelihoods and standards of living of displaced persons;
- improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.

Displaced persons may be classified as persons:

- who have formal legal rights to the land or assets they occupy or use;
- who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under national law;
- who have no recognisable legal right or claim to the land or assets they occupy or use.

### **3. IFC PS8: Cultural Heritage**

This PS recognizes the importance of cultural heritage for current and future generations. Consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage, this PS aims to ensure that a project proponent protects cultural heritage during their project activities.

One of the two central objectives of IFC PS8 is for the project to protect cultural heritage from the adverse impacts of project activities and support its preservation.

The main Uganda legislation applicable to this Audit include:

#### **1. The Constitution of the Republic of Uganda**

Article 237(1) of the Constitution vests all land in Uganda in the citizens of Uganda. However, under Article 237(2)(a), the Government or local government can acquire land in the public interest. Such acquisition is subject to the provisions of Article 26 (on

protection from deprivation of property) which gives every person in Uganda a right to own property either individually or in association with others. Under Article 26(2), no person shall be compulsorily deprived of property or any interest in or right over property of any description except where the following conditions are satisfied:

- The taking of possession or acquisition is necessary for public use or in the interest of defense, public safety, public order, public morality, or public health; and
- The compulsory taking of possession or acquisition of property is made under a law which makes provision for:
  - Prompt payment of fair and adequate compensation, prior to the taking of possession or acquisition of the property; and
  - A right of access to a court of law by any person who has an interest or right over the property.

## **2. The Land Act, Cap 227 as Amended**

Section 42 of the Land Act reaffirms the statutory power of compulsory acquisition conferred on the governments and local government under articles 237(2)(a) and 26(2) of the Constitution. Compensation is assessed in accordance with the valuation principles laid out in Section 77 of the Land Act Cap 227 as amended (on computation of compensation), briefly outlined below:

- Customary land value is the open market value of unimproved land.
- The value of buildings on the land is calculated at open market value for urban areas and replacement cost for rural areas.
- The value of standing crops on the land, excluding annual crops, is determined in accordance with the district compensation rates as set by District Land Boards. Annual crops could be harvested during the period of notice given to the owner.
- In addition to the total sum assessed, if 6 months' notice to surrender possession is given, a disturbance allowance of 15% (of the total sum assessed) is paid; if less than 6 months' notice to surrender possession is given, a disturbance allowance of 30% (of the total sum assessed) is paid.

Section 73(3) of the Land Act requires a Project developer carrying out public works on land to promptly pay compensation to any person having an interest in the land for any damage caused to crops or buildings and for the land and materials taken or used for the works.

## **3. Land Acquisition Act (1965)**

The Land Acquisition Act makes provision for the procedures and methods of compulsory (eminent domain) acquisition of land for public purposes, whether for temporary or permanent use. The Minister of Lands may authorize any person to enter the land, survey the land, dig, or bore the subsoil or any other thing necessary for ascertaining whether the land is suitable for a public purpose. The Government is to compensate any person who suffers damage as a result.

Section 5 of the Act requires notifications to affected or interested persons with such information, such as particulars of land, available avenues of engagement with all persons having an interest in the land, among others.

#### **4. The Public Health Act, Cap 281 of 1935**

The Act harmonises the law concerning the preservation of public health. Concerning grave relocation activities, Section 109 states that it is unlawful to exhume anybody or the remains of anybody, which may have been interred in any authorised cemetery or in any other cemetery, burial ground, or other place without a permit. This permit is only granted to the legal personal representative or next of kin of the person buried, or to his or her duly authorised agent.

Section 110 provides that the Minister of Health has the mandate to order the exhumation needed for the purposes of executing public works or any public purpose.

#### **5. East African Crude Oil Pipeline (EACOP) Act (Special Provisions) Act, 2021**

This Act facilitates the implementation of the EACOP Project in Uganda. It provides for implementing Uganda's obligations under the Intergovernmental Agreement and the Host Government Agreement, and other related matters.

Section 11 of the Act provides that the EACOP project shall constitute public works under Section 1 of the Land Act. The Act requires the Uganda Land Commission or other relevant state authority to grant land rights to enable the project company to undertake all project activities. It also provides that where land has been identified for implementation of project activities, compensation of project affected persons and acquisition of the land shall be done in accordance with the laws of Uganda and the Host Government Agreement.

#### **6. Petroleum (Exploration, Development and Production) Act, 2013**

This Act provides for the licensing, exploration, and production of petroleum. The Act in accordance with article 244 of the Constitution, vests the entire property in, and the control of petroleum in its natural condition in, on or under any land or waters within Uganda, in the Government on behalf of the Republic of Uganda. Section 139 of the Act makes provisions for the compensation of disturbance of land surface rights of affected persons by petroleum activities.

#### **7. The National Environment (Environmental and Social Assessment) Regulations, 2020**

These regulations make provisions for issues to be considered in an environmental and social impact statement for a project. Among these are social considerations, including land acquisition such as resettlement, compensation, impacts on displaced persons and host communities, impacts on existing land use and potential alternative land uses, and restrictions on land use.

#### **8. The Museums and Monuments Act, 2023**

The Act makes provision for: the administrative structures for effective management of cultural and natural heritage, the classification of museums, development and

management of museums and monuments, formalisation, control, and protection of tangible and associated intangible cultural heritage and works of art collection.

## **9. Succession Act, Cap 162 as amended**

An Act relating to succession issues, making specific provision for interests and powers not acquired or lost by marriage, succession to a deceased person's immovable and movable property, distribution of an intestate's property, effect of marriage and marriage settlements on property, wills and codicils, and execution of wills.

The Act specifically provides for gender equality in accordance with Article 21 & 23 of the Constitution, refines the definition of customary heir (or heiress) to remove discrimination, provides for protection of principal residential property for the benefit of the surviving spouse and lineal descendants, revises the percentage distribution of the estate of an intestate, provides for appointment of a guardian for a child by either parent, provides for powers and duties of guardian, and provides for the duration of probate and letters of administration, and execution of will of deceased persons.

## **10. Equal Opportunities Commission Act, 2007**

This Act gives effect to the Government of Uganda's constitutional mandate to eliminate discrimination and inequalities against any individual or group of persons on ground of sex, age, race, colour, ethnic origin, tribe, birth, creed or religion, health status, social or economic standing, political opinion or disability, and take affirmative action in favour of groups marginalized based on gender, age, disability or any other reason created by history, tradition or custom for redressing imbalances which exist against them.

Where applicable, this Audit has referred to other IFC Performance Standards, Ugandan laws, and policies. The full details of the applicable Ugandan legal & policy framework, as well as the Gap analysis between the IFC PS and Ugandan Legislation, are presented in Sections 3.2 and 3.3 of this Report.

Based on Document Reviews, Key Informant Interviews, Focus Group Discussions, Survey of PAHs, Site Visits, and Observations, all conducted from 15 July 2024 to 28 October 2024, the audit examined fifteen (15) audit areas. It assessed their compliance against the applicable IFC Performance Standards and Uganda legislation requirements.

The 15 audit areas, their compliance elements, and applicable IFC Performance standards & Uganda legislation are:

### **1. Stakeholder participation and disclosure**

- Disclosure of Information.
- Consultation.
- Informed Consultation and Participation.

(IFC PS 1 & 5, Uganda Land Acquisition Act 1965)

### **2. Compensation Determination**

- PAPs identification and eligibility.
- Identification and Inventory of Affected Assets.

- Determination of compensation at full replacement cost.

(IFC PS5 and Section 77 Land Act Cap 227 as amended)

### **3. Compensation Payment**

- Land acquisition should only take place after compensation has been made available (where not possible, e.g., in case of land ownership disputes, compensation funds shall be made available, e.g., through escrow account deposit before displacement).
- Compensation Assistance.
- Compensation standards should be transparent and applied consistently to all communities and persons affected by the displacement.

(IFC PS5 and Article 26(2) of the Constitution of the Republic of Uganda)

### **4. Vulnerable Persons Assistance**

- Identification of Vulnerable Persons and groups
- Particular attention should be paid to the needs of the poor and the vulnerable.

(IFC PS 1 & 5, Uganda Gender Policy (2007), National Policy on Elimination of Gender Based Violence (2016), National Policy for Older Persons (2009), National Policy on Disability (2016), National Orphans and other Vulnerable Children (OVC) Policy (2004), and National Youth Policy (2016))

### **5. Delivery of Transitional Assistance**

- Provision of Transitional Support.

(IFC PS5)

### **6. Livelihood restoration and improvement**

- Provision of adequate livelihood restoration and improvement programs.

(IFC PS5)

### **7. Community Cohesion and Social Disarticulation**

- Opportunities for displaced communities to derive appropriate development benefits from the project.

(IFC PS5)

### **8. Implementation of Grievance Management Mechanisms**

- Establishment of grievance mechanism (GM) early in the development phase.
- An accessible and responsive GM.
- PAPs' awareness about GM.
- Grievance documentation and reporting.
- Recourse to alternative judicial or administrative remedies.

(IFC PS1 & 5)

## 9. Replacement land acquisition and processes

- Offer of replacement land.

(IFC PS5)

## 10. Replacement housing and tenure security

- Provision of adequate replacement housing to PAPs.
- Security of Tenure for the replacement house land.

(IFC PS5)

## 11. Restoration or improvement of affected communal property

- Efforts by the Project to avoid or minimize impacts on communal property.
- Restoration or improvement of affected communal property.

(IFC PS5)

## 12. Management of cultural and heritage sites

- Identification of cultural heritage.
- Exhumation and relocation of identified cultural heritage property in accordance with established procedures.

(IFC PS8, and Public Health Act Cap 281)

## 13. Issuance of Notices to Vacate (NTV) and avoidance of forced eviction

- Issuance of NTVs.
- Avoidance of forced eviction.

(IFC PS5, and Article 26(2) of the Constitution of the Republic of Uganda)

## 14. Project Land Titling and Transfer

- Titling/transfer of the acquired land.

(IFC PS5, Article 26(2) of the Constitution of the Republic of Uganda, and EACOP Act 2021)

## 15. Governance, including human and financial resources

- Organisational capacity and competency.

(IFC PS1)

The compliance rating applied to this Audit is defined below:

Compliance Level	Definition
Compliant	The audit compliance requirement is met.

<b>Compliance Level</b>	<b>Definition</b>
Partially Compliant	Some aspects of the audit compliance requirement are met, while others are not; however, ongoing activities are still being implemented. Such audit areas will be followed up during the livelihood restoration monitoring and reviews, or the Ex-post RAP Implementation audit.
Non-Compliant	The audit compliance requirement is not met.
No rating possible yet	Lack of up-to-date information, too early in the implementation process, or not yet able to verify the implementation progress to rate the audit.

The audit findings and observations mostly indicate compliant practices. However, in some audit areas, work is still ongoing, requiring completion and strengthening, primarily concerning ensuring the security of tenure for physically displaced PAPs, supporting the former Taala Central Forest Reserve physically displaced PAPs in identifying alternative land where they can relocate without risk of eviction, and undertaking ongoing internal monitoring of vulnerable persons for potential need of additional LRP packages. In addition, other areas where implementation is still ongoing include livelihood restoration and improvement activities. Areas for strengthening include additional stakeholder engagement with PAPs on eligibility criteria for the different LR Support packages and ensuring all enlisted PAPs are covered during (additional) package selection.

Key audit summary findings, observations, and the specific corrective actions needed are presented below. More details of the Audit findings and the Corrective Action Plan are included in Sections 5 & 6 of this Report. In Section 7, the Audit recommends implementing the activities listed in Table 20 to improve practices that EACOP is already undertaking beyond the compliance requirements in certain audit areas.

**Audit Area 1: Stakeholder Participation and Disclosure**

**Compliance Requirements**

IFC PS1 establishes the importance of effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them. IFC PS5 para 9 requires engagement with affected communities, including host communities, through the process of stakeholder engagements described in PS1. For example, decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. IFC PS1 further recognizes that stakeholder engagement is an ongoing process throughout the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement. Section 5 of the Uganda Land Acquisition Act 1965 (Cap. 226) requires notifications to affected or interested persons with such information, such as particulars of land, available avenues of engagement with all persons having an interest in the land, among others.

The key findings on stakeholder participation and disclosure requirements are presented in the summary table below:

- Disclosure of Information
- Consultation
- Informed Consultation and Participation.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Disclosure of Information	<p>The audit has established an overall positive finding in the implementation of stakeholder engagements during the EACOP Uganda RAP Preparation and Implementation phase. The RAP Report presents details on the stakeholder engagement undertaken during the RAP planning phase and those that were planned for the RAP implementation phase.</p> <p>Workshops and sensitization meetings were conducted for national, district, sub-county, and village stakeholders. At the village level, community members and local leaders were sensitized. A total of 48,700 persons (17,807 women) attended meetings.</p>	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>During the RAP Implementation phase, stakeholder engagement was undertaken on topics including RAP, Compensation Packages, Replacement Housing (including their design, delivery, and handover to eligible physically displaced households), Livelihood Restoration (LR) packages, and Grievance Management.</p> <p>Of the sampled PAHs (638), 98.6% (100% female-headed PAHs; 99.5% male-headed PAHs) indicated they were informed about RAP activities, 99.5% reported that they were informed about their rights to continue cultivating their land with seasonal crops post-cut-off date, and 98.4% reported being informed about the available compensation assistance.</p> <p>PAPs also confirmed this high score in the level of information disclosure during KIIs, FGDs, and site visits/observations. They mentioned that they were also informed about the contents of the Transitional Support and LR packages, as well as the open access to the LR agricultural training to non-PAPs. EACOP reported that approximately 400 non-PAPs have so far participated in LR agricultural training.</p>			
2.	Consultation	99.2% of the sampled PAHs stated they were adequately consulted during the RAP Preparation and Implementation phases. PAPs also confirmed this during FGDs and site visits/observations. PAPs mentioned that EACOP offered translation in local languages, transportation of vulnerable PAPs to attend meetings, and consultations on resettlement location options and alternatives.	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>In the audit survey, 91.5% (584 of the sampled PAHs) reported no instances of undue pressure towards PAPs during the Entitlement Briefing and Compensation Agreement (EB/CA) signing. While not applicable to everyone, some of the remaining PAPs reported that they did not understand that the grievance mechanism did not affect their rights to seek legal redress in court.</p> <p>From the review of documents, it was found that there were numerous and inclusive engagements with PAPs and not-directly affected communities, including women, during the RAP preparation and implementation phases (Chapter 12 of the RAP Report; RAP Implementation Engagements extract from Borealis Electronic Management Software of January 2022 to June 2024).</p>			
3.	Informed Consultation and Participation	<p>According to the survey, 70.7% of the sampled PAHs were very satisfied, 23.8% moderately satisfied, while 5.5% were unsatisfied with the incorporation of their perspectives. Of the sampled women (224), 73.0% were very satisfied, 23.0% moderately satisfied, and 4.0% not satisfied with the incorporation of their perspectives in the RAP activities.</p> <p>Outcomes of KIIs, FGDs, and site visits/observations indicated reasons from PAPs:</p> <ul style="list-style-type: none"> <li>• for satisfaction: preferred resettlement location adopted</li> <li>• for unsatisfaction: attention to PAPs' feedback regarding their preferred seasonal calendar for delivery of inputs, compounded by external</li> </ul>	Compliant	None required	During the remaining LR implementation activities, incorporate the views of PAPs on input delivery schedules in line with the seasonal calendar/planting windows.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		factors such as drought, negatively affected results of the crop growing LR support program.			

## Audit Area 2: Compensation Determination

### Compliance Requirements

The IFC PS5 para 9 requires where displacement cannot be avoided, displaced communities and persons should be offered compensation for loss of assets at full replacement cost<sup>2</sup> and other assistance to help them improve or restore their standards of living or livelihoods. IFC PS5 further requires a full identification of displaced persons. According to para 17, displaced persons are in three categories:

- Those “who have formal legal rights to land or the assets they occupy or use”. These include persons holding land on customary, freehold, Mailo, and leasehold tenure in accordance to Article 237(3) of the Constitution of the Republic of Uganda and Sections 2 & 3 of the Land Act Cap 227 as amended.
- Those “who do not have formal legal rights to land or assets but have a claim to land which is recognised or recognisable under national law”. These include lawful and bonafide occupants<sup>3</sup> within the meaning of Section 29 of the Land Act Cap 227 as amended.
- Those “who have no recognisable legal right or claim to land or the assets they occupy or use”. These are licensees that include:
  - persons who have constructed buildings and or have cultivated crops on land owned by others, without approval and /or knowledge of the landowner. Such persons have no ownership interest in the land;
  - relatives who have been given rights to carry out agricultural production as well as building a homestead but without necessarily having legal land rights. A typical example is children building next to their parents’ homestead and perhaps even sharing a compound. These persons own structures and or crops but have no ownership interest in the land;
  - squatters on protected land and reserves such as central forest reserves and wetlands. These persons own structures and or crops but have no ownership interest in the land;

<sup>2</sup> Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow affected communities and persons to replace lost assets with assets of similar value.

<sup>3</sup> Lawful and Bonafide Occupants are popularly known as Kibanja Landholders.

- Licensed users within protected land and reserves such as central forest reserves. These persons are eligible for compensation for their planted trees in the forest reserve.

Section 77 of the Land Act Cap 227, as amended, provides the following valuation principles for compensation assessment determination:

- Land value is the open market value of unimproved land.
- The value of buildings on the land is calculated at open market value for urban areas and replacement cost for rural areas.
- The value of standing crops and trees on the land, excluding annual crops, is determined in accordance with the district compensation rates as set by District Land Boards. Annual crops could be harvested during the period specified in the notice given to the owner.
- In addition to the total sum assessed, if 6 months' notice to surrender possession is given, a disturbance allowance of 15% (of the total sum assessed) is paid; if less than 6 months' notice to surrender possession is given, a disturbance allowance of 30% (of the total sum assessed) is paid.

The Guidelines for Compensation Assessment Under Land Acquisition (GCALA), 2017, recommend that the compensation award should be reviewed annually at 15% if it has not been paid within one year from the project cut-off date.

The key findings on compensation determination focused on the following compliance requirements:

- PAPs identification and eligibility.
- Identification and Inventory of Affected Assets.
- Determination of compensation at full replacement cost<sup>4</sup>.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	PAPs identification and eligibility	The RAP identified all directly Affected Persons (3,660 PAPs) comprising PAPs with registered land interests (freehold, leasehold, and Mailo), PAPs with	Compliant	None required	None required

<sup>4</sup> Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow affected communities and persons to replace lost assets with assets of similar value.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		unregistered land interests (such as Kibanja holders), customary landowners, and licensees. The 3,660 PAPs comprise of 3,588 PAHs <sup>5</sup> and 72 Project Affected Institutions (PAIs) as per the CGV Approved Valuation Reports.			
2.	Identification and Inventory of Affected Assets	<p>The RAP identified all affected assets, and inventory was prepared for all 3,660 PAPs with active participation and witness of the process by PAPs or their representatives and the Local Council (LC) 1 chairpersons or their representatives.</p> <p>98.1% of the sampled survey PAHs (638) reported to have participated in the assets survey and assessment exercise. Those who did not participate reported that they were unavailable in the project area at the time of the surveys, and representatives such as spouses typically participated on their behalf.</p> <p>92.0% of the sampled survey PAHs (638) reported that their affected assets were adequately documented in the assets survey form. The remaining 8.0% reported that their assets were not adequately captured, and they logged grievances with the Project, which, where appropriate, resulted in asset reassessment and</p>	Compliant	None required	None required

<sup>5</sup> Individuals who are part of families affected by the Project's development are collectively referred to as Project Affected Households (PAHs), which includes members of a household, whether related or not, operating as a single socio-economic and decision-making unit, who are affected by the Project. In other words, as per Uganda Bureau of Statistics (UBOS), a household is defined as a person or group of persons who normally cook, eat and live together irrespective of whether they are related or unrelated.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		preparation of supplementary valuation reports by EACOP.			
3.	Determination of compensation at full replacement cost	<p>The statutory compensation awards approved by the Chief Government Valuer (CGV) were calculated based on: current market rates for land, current replacement costs for buildings of permanent nature, and using approved District Compensation Rates (DCRs) for crops, trees, graves, and buildings of non-permanent nature. The statutory compensation award also included 30%<sup>6</sup> disturbance allowance.</p> <p>KII outcomes also observed that initially, after the Chief Government Valuer (CGV) approved Valuation Reports, it was discovered that the banana and coffee DCRs for Kyotera were lower than the neighbouring Lwengo DCRs. Following approval from the CGV to adopt new rates, this anomaly was corrected by the Project through an addendum Valuation Report for Kyotera PAPs and the signing of addendum Compensation Agreements (CAs).</p> <p>In addition to the statutory compensation award, EACOP provided a 15% annual uplift from the cut-off date to the date of approval of the Valuation Reports by the CGV. Hence, PAs PAPs were accordingly</p>	Compliant	None required	Ensure continued clear communication with PAPs, especially regarding the pending valuation of unviable residual land.

<sup>6</sup> The Project issued a Notice to Vacate (NTV) of 3 months (less than 6 months) and therefore the applicable disturbance allowance was 30% in compliance with Section 77(2) of the Land Act Cap 227 as amended.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>compensated with an uplift for 3 years (2018-2021) while PPL RoW PAPs were compensated with an uplift for 2 years (2019-2021). As a result, PA PAPs received an uplift of 45% in addition to the CGV-approved statutory compensation, while PPL RoW PAPs received an uplift of 30% on top of the CGV-approved statutory compensation.</p> <p>KIIs observed difficulties in some cases over categorization and analysis of land uses for small parcels, especially in the determination of whether such plots are commercial or residential. It was observed that those who raised such grievances, EACOP reviewed these grievances, and where appropriate, their land was re-categorized and reassessed through supplementary valuation reports.</p> <p>Other findings: Determination of unviable residual land (URL) valuation was still pending. PAPs were aware that unviable residual land would be assessed and compensated for at the construction phase of the pipeline, as required by the CGV.</p> <p>PAPs expressed their wish that land rates be disclosed early enough before they are applied in the assessment of their URL</p>			

### Audit Area 3: Compensation Payment

#### Compliance Requirements

The IFC PS5 para 9 requires project proponent to take possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation. In cases of physical displacement, PS5 para 21 requires the project proponent to offer a choice of replacement property (in-kind compensation) of equal or higher value, security of tenure, equivalent or better characteristics, and advantages of location or cash compensation where appropriate. Compensation in kind should be considered in lieu of cash. Cash compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets. PS5 para 9 requires compensation standards to be transparent and applied consistently to all communities and persons affected by the displacement. PS5 further requires that documentation of ownership or occupancy and compensation arrangements should be issued in the names of both spouses or heads of households.

In addition, Article 26(2) of the Constitution of the Republic of Uganda includes a requirement for prompt payment of fair and adequate compensation prior to taking possession or acquiring the property.

The key findings on compensation payment focused on the following compliance requirements:

- Land acquisition should only take place after compensation has been made available (where not possible, e.g., in case of land ownership disputes, compensation funds shall be made available, e.g., through escrow account deposit before displacement)
- Compensation Assistance
- Compensation standards should be transparent and applied consistently to all communities and persons affected by the displacement.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Land acquisition should only take place after compensation has been made available (where not	The implementation of the RAP commenced with: Bank account opening, Financial Literacy Training (FLT), and entitlement briefings and compensation agreements (EB/CA) signing in that order. PAPs were paid compensation before the Project took possession of their land, and according to the Project Implementation Summary dated 28 October 2024, 99% (or 3,627/3,660) of PAPs had signed their	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
	possible, e.g., in case of land ownership disputes, compensation funds shall be made available, e.g., through escrow account deposit before displacement)	<p>Compensation Agreements (CAs), with 97% (or 3,567/3,660) paid compensation.</p> <p>In the case of spouses, the CA was jointly signed, the Bank account was jointly held, and spousal consent was a mandatory requirement for all documentation and signing of the CAs.</p> <p>Through KIIs and FGDs, PAPs confirmed that compensation payments were made through bank accounts opened with Centenary Bank with support from EACOP.</p> <p>Where it was not possible to make compensation available, e.g., in cases of land ownership disputes, compensation funds were made available through escrow account deposit.</p>			
2.	Compensation Assistance	<p>The audit survey PAPs reported that they were assisted in opening bank accounts and receiving other necessary support to access their monetary compensation promptly. Audit survey results indicate that 98% (627) of the PAHs reported receiving this support, with 99% (632) successfully opening bank accounts.</p> <p>Other PAPs reported receiving assistance in obtaining letters of administration, powers of attorney, national identification cards, and NIRA death certificates.</p>	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
3.	<p>Compensation standards should be transparent and applied consistently to all communities and persons affected by the displacement.</p>	<p>The audit established that PAPs were offered compensation packages based on the type of displacement.</p> <p>Economically displaced PAPs received monetary compensation, while physically displaced PAPs (depending on the ownership interest they held in the affected land) were offered a replacement housing option and could choose either a replacement house or monetary compensation.</p> <p>The Project RAP identified 195 physically displaced (PD) PAPs, of whom: 175 opted to receive replacement houses, 5 were within the Taala Central Forest Reserve (CFR) (a designated protected area in Kwankwanzi District) and not eligible for replacement housing (reflecting the their informal occupancy with no formal land rights according to the national law), and 15 opted for monetary compensation.</p> <p>Of the 175 PAPs that opted for replacement houses, 139 had sufficient residual land or owned existing alternative land on which EACOP constructed the replacement house. The remaining 36 PAPs had insufficient residual or alternative land and were supported by EACOP to purchase replacement house land (minimum 0.3 acres). This EACOP support included: due diligence on the suitability of the identified</p>	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>land for a replacement house, survey and preparation of survey drawing confirming the land size for purchase, preparation of a tripartite land purchase agreement between the vendor, PAP, and EACOP, and paying the purchase price (which included the statutory compensation value for the affected land) on behalf of the PAP.</p> <p>In accordance with the Project RAP, EACOP confirmed during the audit KII that they are committed to providing the 5 Taala physically displaced PAPs with secure access to alternative land, where they can resettle without facing the risk of forced eviction. EACOP plans to purchase (1) acre of land for each of the five PAPs.</p> <p>The 15 PD PAPs that opted for monetary compensation to build their own houses had sufficient residual or alternative land.</p>			

#### **Audit Area 4: Vulnerable Persons Assistance**

##### **Compliance Requirements**

IFC PS1 para 12 requires a project proponent to identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. Where individuals or groups are identified as vulnerable, the project will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities. PS5 para 19 requires that particular attention should be paid to the needs of the poor and the vulnerable.

The Ugandan policies<sup>7</sup> on gender, elimination of gender-based violence, older persons, disabilities, and youths, all require Projects to put in measures that ensure robust identification of such vulnerable categories of PAPs, as well as put in place vulnerable persons assistance programs during RAP planning and implementation.

The key findings on vulnerable persons' assistance focused on the following compliance requirements:

- Identification of Vulnerable Persons and groups
- Particular attention should be paid to the needs of the poor and the vulnerable.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Identification of Vulnerable Persons and groups	The Project RAP — through the socio-economic household baseline survey and during the land acquisition fieldwork identified – identified vulnerable persons including: child headed household (under 18 years), Elderly headed households (65+ years), Female headed household (widow/divorced/separated/never married), chronically sick, Disabled persons (physical, mental, blind, deaf, hearing impairment), and Women household members at risk of being disproportionately impacted (e.g. those in polygamous marriages, threatened with divorce and abandonment, affected by cultural practice) (see Chapter 10 of the RAP Report and the Vulnerable Household Register).	Compliant	None required	None required
2.	Particular attention should be paid to the	Audit surveys, KIIs, and FGDs confirmed that the Project:	Compliant	None required	Offer a third training in Financial Literacy, Money Management, Family strengthening, and gender to

<sup>7</sup> These policies include: Uganda Gender Policy, 2007; National Policy on Elimination of Gender Based Violence, 2016; National Policy for Older Persons, 2009; National Policy on Disability, 2016; and National Youth Policy, 2016

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
	needs of the poor and the vulnerable	<ul style="list-style-type: none"> <li>● ensured joint bank accounts and spousal consents for both spouses.</li> <li>● ensured attendance of spouses at disclosure &amp; EB/CA signing.</li> <li>● provided transportation for physically displaced vulnerable households.</li> <li>● undertook disclosures and increased visits to affected vulnerable households.</li> <li>● provided financial literacy, money management, and family strengthening training.</li> <li>● Increased access to transitional support of food baskets through delivery to vulnerable PAHs homes.</li> </ul> <p>Additionally, during the RAP implementation phase, the audit established that EACOP implemented the following specific gender inclusion and GBV prevention activities:</p> <ul style="list-style-type: none"> <li>● Prevention and response to GBV: Community awareness about GBV, mediation and counselling for particular cases, and referrals of GBV cases to other service providers.</li> <li>● Strategic quarterly gender engagement meetings with CSOs and the District local government Gender and Community-Based Services department: To seek their inputs and assess the impact of EACOP interventions for addressing GBV.</li> </ul>			<p>mitigate any emerging risks of gender based violence.</p> <p>Undertake ongoing internal monitoring of vulnerable persons for potential need of additional LRP packages.</p>

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<ul style="list-style-type: none"> <li>● Mediation of conflicts: for example, claims of inequitable sharing of compensation between PAP and spouse.</li> <li>● Gender integration into Livelihood Restoration Support: To ensure inclusive access, participation, and ownership of resources provided through EACOP's LR support.</li> <li>● Gender monitoring within support to Vulnerable PAPs: Promoting gender inclusion in special support provided to vulnerable PAPs.</li> <li>● Mentorship and coaching of youth in life skills: Empowering youth to take control of their lives, relying less on others, and being capable of handling everyday tasks and challenges.</li> </ul> <p>PAPs reported that the above support was beneficial, especially the beneficial effects of the family strengthening, money management, and financial literacy training on harmony and avoiding gender-based violence between spouses. During the FGDs with women PAPs, re-occurring behavior of gender-based violence was reported by PAPs. To increase the sustainability of this training, follow-up training was requested by vulnerable PAPs. During KII, EACOP confirmed that it will offer a third round of training in financial literacy, money management, and family strengthening.</p>			

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		The audit confirmed that EACOP offered psycho-social support to PAPs impacted by grave relocation activities. This was also confirmed through audit interviews with PAPs who had graves and the psycho-social contractor.			

### Audit Area 5: Delivery of Transitional Support

#### IFC Requirements

The IFC PS5 para 29 requires that transitional support should be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.

The key findings focused on the provision of transitional support as presented below:

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Provision of Transitional Support	<p>The Project offered the following transitional support programs:</p> <ul style="list-style-type: none"> <li>• Two (2) rounds of Financial Literacy and Money Management Training program for all PAPs, and a third round has been planned.</li> <li>• Transporting/moving physically displaced (PD) PAPs and vulnerable PAPs, and their belongings to their new dwellings.</li> <li>• Food Basket support to eligible PAPs for immediate food security after compensation payment and coming into force of the NTV.</li> </ul>	Compliant	None required	Undertake additional stakeholder engagements with PAPs on eligibility criteria for food baskets, especially for those remaining PAPs yet to be enrolled.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>95.1% of the sampled households in the audit survey reported that they attended and participated in the financial literacy training programs. Overall, there was a favourable perception of financial literacy training among PAHs across all districts impacted by the project (Of those who participated, 89.0% indicated that the training was generally beneficial).</p> <p>PAPs also received food baskets, which started after the Notice to Vacate (NTV) expired following the receipt of compensation payment. As of 28 October 2024, 86.0% (1,949 out of 2,257 eligible PAPs) had started, with 1,020 (or 45.0%) having completed the program.</p> <p>During the audit, it was also observed that from the visited PAHs who received or were receiving food baskets, the deliveries had been recorded accurately by the EACOP contractor in the PAPs' Food Basket passports, and PAPs confirmed that they had received them.</p> <p>During the audit KII, it was reported that food baskets were delivered to the homes of vulnerable or disabled persons.</p> <p>Approximately 14.0% (or 308) of PAHs eligible for food baskets had not yet commenced the program. During FGDs with PAPs and women, it was observed that some PAPs did not fully understand</p>			

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		the eligibility/entitlement criteria for food baskets.			

### Audit Area 6: Livelihood Restoration and Improvement

#### Compliance Requirements

The IFC PS5 para 9 requires that, where displacement cannot be avoided, displaced communities and persons should be offered compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods. The standard requires that, besides compensation, affected persons and communities should be provided with adequate livelihood restoration and improvement programs established based on the project impacts.

The key findings focused on the provision of adequate livelihood restoration and improvement programs as presented below:

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Provision of adequate livelihood restoration and improvement programs	<p>In addition to the transitional support programs, the Project is offering the following LR support programs:</p> <ul style="list-style-type: none"> <li>• Food Security: establishing vegetable gardens</li> <li>• Crop Productivity Enhancement and Diversification</li> <li>• Livestock Rearing and Productivity Enhancement</li> <li>• Vocational Skills and Enterprise Development Training Program.</li> </ul> <p>It is important to note that the findings below are preliminary and pertain to the LR support activities. These activities will undergo further external monitoring and review during</p>	No rating possible yet since LR support activities are still ongoing. Preliminary interim findings from PAH survey indicating PAH livelihoods improved (69.6%), restored (21.9%), not yet restored (8.5%)	None required	<p>Undertake additional stakeholder engagements with PAPs who have inadequate information on eligibility criteria for the different LRP packages and ensure all enlisted PAPs are covered during (additional) package selection.</p> <p>Provide an additional round of LR support to PAPs that got low crop yields. Engage timely with the relevant stakeholders to avoid or mitigate delays so that crop calendars are respected</p> <p>Expedite the enrolment of the remaining 462 eligible PAPs for LR activities</p>

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>the forthcoming periodic LR external monitoring and reviews.</p> <p>Out of 3,400 eligible PAHs, 2,938 PAHs (or 86%) had commenced the LR support programs as per the Project Implementation Summary dated 28 October 2024.</p> <p>Of the 638 sampled survey PAPs, 97.0% reported receiving LR support, comprising training in various LR support packages and inputs/tools.</p> <p>69.6% PAHs reported that the Project has so far improved their living standards (better than before) compared to the pre-displacement conditions. In comparison, 21.9% reported that their living standards have been restored (same as pre-displacement). Through the KIIs, PAHs reported that they have acquired replacement houses, constructed their own houses, purchased household items, bought livestock and land for agriculture, acquired agricultural and entrepreneurial skills, and their youth are undertaking vocational training.</p> <p>8.5% reported their living standards were worse off because they are no longer able to access sufficient land to support their livelihoods.</p> <p>During the audit site visits to former Taala Central Forest Reserves physically displaced PAPs, it was found that some of</p>			<p>Continue cooperation with demonstration sites especially since they are still needed to train PAHs yet to be enrolled on LR programs.</p>

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>these PAPs are still accessing the forest land to carry out their agricultural livelihood activities, including planting crop seed starter packs provided by EACOP. According to the RAP Report commitments, the Project was required to work with Kyankwanzi district local government and other authorities to help these PAPs secure access to alternative land where they can resettle without facing the risk of forced eviction. During the audit KII, EACOP committed to purchase one (1) acre of land for each of the five (5) Taala physically displaced PAPs to ensure their security of tenure.</p> <p>79.5% of surveyed households in the audit reported being food secure in the last 6 months, with some citing that they are still recipients of food baskets, in addition to improved harvests from the starter-pack seeds they planted in the first season of 2024. This performance will require additional monitoring when such households eventually exit the food basket support.</p> <p>PAHs in the audit survey also reported an increase in household agricultural production, with 54.6% (or 348) households reporting a positive change in household produce, compared to 39.3% indicating no change. The increase was reported in crops such as maize, beans, and cassava. However, some of the PAHs that received</p>			

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>the input starter pack of maize and beans reported low germination, mainly attributed to late delivery of inputs and drought in the first season of 2023 &amp; 2024.</p> <p>During the KIIs, FGDs, site visits/observations, concerns were raised by PAPs on the sustainability of the LRPs over the long term to create lasting effects for PAHs: Examples given: Parish Development Model (PDM), strengthening savings and loan groups. It will be very expensive for them to sustain production due to the high costs of agro-inputs, especially chemicals.</p> <p>Feedback from the audit FGDs and KIIs: The LR activities—through demonstration gardens and the adoption of best agricultural practices—generally led to increased production. As a result, there were bumper harvests of vegetables, but limited markets for the surplus, especially maize, sukuma wiki, and eggplants.</p> <p>During KIIs, it was recommended that PAPs receive support from LR officers at the household level to ensure a self-sustaining community system. Additionally, EACOP was advised to consider linking them to government programs, such as the Parish Development Model (PDM), to strengthen saving and loan groups and create market linkages.</p>			

**Audit Area 7: Community Cohesion and Social Disarticulation**

**Compliance Requirements**

The IFC PS5 para 9 also requires the project proponent to provide opportunities to displaced communities and persons to derive appropriate development benefits from the project. The key findings in this regard are presented below:

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Opportunities for displaced communities to derive appropriate development benefits from the project	<p>EACOP is committed to providing in-kind replacement of water sources affected by the Project's land acquisition. This includes the establishment and training of the respective Water Management Committees (WMCs).</p> <p>EACOP is also committed to drilling boreholes as part of the Company Social Investment Strategy to benefit the wider Project Affected Communities (PAC). The Company has a Social &amp; Environmental Investment (SEI) and Corporate Social Responsibility (CSR) Strategy. As part of this strategy, the Project provided opportunities for non-PAPs to attend agricultural training at the demonstration gardens with EACOP reporting that approximately 400 non-PAPs have participated. Other examples included in this strategy for non-PAPs that have not yet been implemented include the extension of additional livelihood improvement activities to non-PAPs (e.g., commercial linkages to off-takers and out-grower schemes).</p> <p>To foster community cohesion and to avoid or minimize conflict between PAPs and non-PAPs, the extension of benefits to non-PAPs should be further implemented.</p>	Compliant	None required	<p>Give priority to further implementation of the EACOP Social and Environmental Investment Strategy at the community level through additional livelihood improvement activities.</p> <p>Continue to sensitize affected communities about non-PAPs being able to access EACOP LR agricultural training.</p>

## Audit Area 8: Implementation of Grievance Management Mechanisms

### Compliance Requirements

IFC PS1 para 2 requires project proponents to establish a grievance mechanism that facilitates early indication of, and prompt remediation for those who believe that they have been harmed by a project proponent’s actions. PS 1 key objectives also require that grievances from affected communities and stakeholders are responded to and managed appropriately.

IFC PS1 para 35 further requires that the grievance mechanism should enable the rapid resolution of grievances, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, at no cost and without retribution. The mechanism should not impede access to judicial or administrative remedies. The Project should inform affected communities about the existence of the mechanism and how to access it through stakeholder engagement processes.

IFC PS5 para 11 requires that a grievance mechanism should allow the project to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely manner, including a recourse mechanism designed to resolve disputes in an impartial manner.

The key findings on the implementation of grievance management focused on the following areas:

- Grievance management mechanism established early in the development phase of EACOP
- Establishment of an accessible and responsive grievance management mechanism
- Awareness about the grievance management mechanisms
- Documentation and reporting of grievances
- Mechanism allowed recourse to alternative judicial or administrative remedies

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas of Improvement
1.	Establishment of the grievance mechanism (GM) early in the	EACOP established a grievance mechanism (GM) early during the RAP preparation phase (see RAP Report Chapter 4).	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas of Improvement
	development phase				
2.	An accessible and responsive GM	<p>EACOP GM established multiple channels for reporting and submitting grievances. These include: EACOP Community Liaison Officers (CLOs), Telephone using the EACOP toll-free line 0800 216 000, direct contact with EACOP Grievance Administrator, Email at <a href="mailto:grievances.ug@eacop.com">grievances.ug@eacop.com</a>, walk-in to any nearby EACOP offices, EACOP Contractor or sub-contractor staff, etc. During the RAP planning phase, Local Resettlement Committees were established at the village level (for all 171 villages), which facilitated the resolution of grievances related to land disputes, asset and cadastral surveys.</p> <p>Through document review of Project grievance records, the audit noted the Project had so far registered 995 grievances and 977 (98.2%) had been resolved by July 2024, leaving 18 grievances pending.</p> <p>The audit survey found that 27% of the sampled PAHs reported having logged grievances with the grievance mechanism, and that their grievances were resolved.</p>	Compliant	None required	None required
3.	PAPs' awareness about GM	The Project RAP includes a grievance procedure, which was widely disseminated during the RAP preparation and implementation phase through stakeholder engagements.	Compliant	None required	EACOP already provides ongoing communication to PAPs and other stakeholders on the grievance mechanism. It is essential to continue these communications for the

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas of Improvement
		76% of PAPs in the audit survey reported being aware of and informed about the availability of the Project's grievance mechanism.			remainder of the RAP implementation and construction.
4.	Grievance documentation and reporting	<p>The review established that the Project documents and tracks all grievances through field Grievance register books and Borealis electronic management software for stakeholder management, including progress reporting.</p> <p>The audit noted that the Project had so far registered 995 grievances and 977 (98.2%) had been resolved, leaving 18 grievances pending as per the Project Implementation Summary dated 28 October 2024.</p>	Compliant	None required	None required
5.	Recourse to alternative judicial or administrative remedies	<p>The Project grievance mechanism includes PAPs having the opportunity to proceed to the courts of law when not satisfied with the resolutions of the Project grievance mechanism. EACOP issues a formal escalation letter to the grievant, verifying that all channels of the EACOP grievance process were utilized.</p> <p>During the audit KIIs and FGDs, some PAPs reported that they felt somewhat uncomfortable at the mention of "use of courts of law" as part of the grievance management process. EACOP communicated this as part of the compliance requirement to IFC PS 1 para 35, which requires the grievance</p>	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas of Improvement
		mechanism not to impede access to judicial or administrative remedies.			

### Audit Area 9: Replacement Land Acquisition and Processes

#### Compliance Requirements

IFC PS5 para 28 requires that affected persons whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost should be offered as a matter of priority in addition to compensation for lost assets, if any.

The key findings are offering replacement land as presented below:

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Offer of replacement land	<p>Being a linear Project, most PAPs (physically or economically displaced or both) had only a small portion of their land affected.</p> <p>The Project RAP identified 195 physically displaced (PD) PAPs, of whom: 175 opted to receive replacement houses, 5 were within the Taala Central Forest Reserve (CFR) (a designated protected area in Kwankwanzi District) and not eligible for replacement housing (reflecting their informal occupancy with no formal land rights according to the national law), and 15 opted for monetary compensation.</p> <p>Out of the 175 physically displaced PAPs who opted for replacement houses, EACOP supported 36 —whose residual or alternative land was not adequate for both replacement housing and supporting livelihoods—with the</p>	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>purchase of replacement house land (minimum 0.3 acres). This EACOP support included: due diligence on the suitability of the identified land for a replacement house, survey and preparation of survey drawing confirming the land size for purchase, preparation of a tripartite land purchase agreement between the vendor, PAP, and EACOP, and paying the purchase price (which included the statutory compensation value for the affected land) on behalf of the PAP.</p> <p>During the audit site visits to former Taala Central Forest Reserves physically displaced PAPs, it was found that some of these PAPs are still accessing the forest land to carry out their agricultural livelihood activities, including planting crop seed starter packs provided by EACOP. According to the RAP Report commitments, the Project was required to work with Kyankwanzi district local government and other authorities to help these PAPs secure access to alternative land where they can resettle without facing the risk of forced eviction. During the audit KII, EACOP committed to purchase one (1) acre of land for each of the five (5) Taala physically displaced PAPs to ensure their security of tenure. These PAPs also received monetary compensation for their affected houses, transitional support, and livelihood restoration support packages, including 12-month food baskets.</p> <p>The 15 physically displaced PAPs who opted for monetary compensation comprised 4 PAPs who</p>			

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>were licensees (and not eligible for a replacement house) and 11 PAPs with sufficient residual land or existing alternative land.</p> <p>48.0% of the sampled economically displaced PAPs used their monetary compensation to purchase land. The remaining 52.0% used their compensation to build or renovate their homes, buy furniture, buy a motorbike or bicycle, pay for their children's tuition, or take care of other outstanding debts.</p>			

### Audit Area 10: Replacement Housing and Tenure Security

#### Compliance Requirements

IFC PS5 para 20 requires that physically displaced persons be offered feasible resettlement options, including adequate replacement housing with security of tenure<sup>8</sup> at resettlement sites or monetary compensation where appropriate, in addition to relocation assistance. The standard also requires that resettlement sites should offer improved living conditions. PS5 Para 21 also requires that the offered replacement property should be of equal or higher value with security of tenure.

The key findings on this audit area focused on:

- Provision of adequate replacement housing to PAPs
- Security of Tenure for the replacement house land.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Provision of adequate replacement	The Project RAP identified 195 (comprising 34 female-headed households and 161 male-headed households) physically	Compliant	None required	None required

<sup>8</sup> Security of tenure means that resettled individuals or communities are resettled to a site that they can legally occupy and where they are protected from the risk of eviction

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
	housing to PAPs	<p>displaced (PD) PAPs of whom 175 (89.7%) opted to receive replacement houses.</p> <p>Based on the Project Implementation Summary dated 28 October 2024, all 177<sup>9</sup> replacement houses had been built and occupied by the beneficiary PAPs.</p> <p>The Project encouraged in-community resettlement, where PD PAPs who opted for a replacement house selected the location of their replacement house in the same village, subject to replacement land availability or another village within the same subcounty. Out of 175 PD PAPs who opted for replacement house, 139 had sufficient residual land or owned existing alternative land onto which the replacement house was constructed. The remaining 36 PD PAPs received EACOP support to purchase replacement house land (minimum of 0.3 acres).</p> <p>Depending on the size of the affected house, PAPs received either Type 1 replacement house (41 sq. metres), Type 2 replacement house (49 square metres), or Type 3 replacement house (54 square metres). The replacement house package included a house with a solar power source, a water tank, an outside kitchen, and a ventilated improved pit (VIP) latrine.</p>			

<sup>9</sup> 2 of the 175 physically displaced PAPs had 2 replacement houses constructed because they had two separate households affected

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>5 PD PAPs within the Taala Central Forest Reserve (CFR) (a designated protected area in Kyankwanzi District) were not eligible for replacement housing (reflecting their informal occupancy with no formal land rights according to the national law). EACOP provided monetary compensation for these affected houses and other assets. They used their monetary compensation to purchase land on which they constructed their own replacement houses, although with uncertain tenure and inadequate to sustain their livelihood activities. During the audit KII, EACOP committed to purchase one (1) acre of land for each of the five (5) Taala physically displaced PAPs.</p> <p>15 PD PAPs (out of 195) also opted for monetary compensation and replaced their own houses.</p>			
2.	Security of Tenure for replacement house land	<p>All 175 physically displaced PAPs who opted for replacement houses identified the location of the replacement house. EACOP undertook land due diligence on the suitability of the land for a replacement house, surveyed the land, including the preparation of a survey drawing confirming the land size, and purchased the identified replacement land (in case of PD PAPs with no residual or alternative land).</p> <p>In the cases of the PD PAPs who opted for replacement houses but had insufficient</p>	Partially Compliant	<p>Process Certificate of Occupancy (in case of replacement houses on Kibanja land) or Freehold Certificates of Title (in case of replacement houses on customary land) for PAPs to guarantee tenure security of replacement houses</p> <p>Expedite support for the 05 former Taala Central Forest Reserve physically displaced PAPs in identifying land/plots</p>	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>residual or alternative land (minimum 0.3 acres), a tripartite land purchase agreement for the replacement land was executed between the vendor, beneficiary PAP, and EACOP, and is the available evidence of security, which in some cases requires more strengthening.</p> <p>In alignment with IFC PS5 and through the audit KIIs with PAU, MEMD, and CGV, it was recommended that, as a minimum, EACOP processes Certificate of Occupancy (in case of replacement houses on Kibanja land) or Freehold Certificates of Title (in case of replacement houses on customary land) to guarantee tenure security.</p> <p>At the time of the audit site visits and observations, it appeared that support had not yet been provided to 05 Taala Central Forest Reserve PDPs that required assistance in accessing alternative land where they can self-relocate without risk of eviction in accordance with the Project RAP commitments. During the audit KII, EACOP committed to purchase one (1) acre of land for each of the five (5) Taala physically displaced PAPs.</p>		<p>where they can relocate without risk of eviction in accordance with the Project RAP commitment.</p>	

**Audit Area 11: Restoration or improvement of affected Communal Property**

**Compliance Requirements**

IFC PS5 requires avoidance or minimization of impacts or restoration or improvement of communal access to land or use of other resources, including communal property and natural resources such as marine and aquatic resources, freshwater, among others.

The key findings on this audit area focused on:

- Efforts by the Project to avoid or minimize impacts on affected communal property
- Restoration or improvement of affected communal property.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Efforts by the Project to avoid or minimize impacts on water sources	<p>The Project RAP (chapter 6) states that a total of 29 water sources, such as valley tanks, boreholes, protected and unprotected spring wells, were affected by the Project</p> <p>Based on a review of additional documents provided by EACOP, it was established that 15 of these were communally used water sources, comprising of 3 community-owned and 12 privately owned water sources. EACOP has committed to in-kind replacement of affected communally used water sources, including some of the former privately owned water sources that previously served the community as part of the company’s social investment strategy. Of the 15 water sources, 3 which were communally owned opted for in-kind replacements, and the other 12 were paid monetary compensation, as well as being</p>	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
		<p>replaced through EACOP's social investment program.</p> <p>During the audit KIIs with community leaders and FGDs with PAPs, it was confirmed that EACOP tried to avoid or minimize impacts on communal water sources.</p>			
2.	Restoration or improvement of affected communal property	<p>The communities owning the three (3) water sources signed Compensation Agreements for in-kind replacement by EACOP. Additionally, compensation agreements for the 12 privately owned water sources were signed by the individual PAPs, who received monetary compensation as well as being replaced through EACOP's social investment program.</p> <p>At the time of the audit, EACOP reported that eight (8) boreholes were completed, with seven (7) water sources pending replacement. In addition, EACOP supported the establishment and training of Water Management Committees for these communal water resources.</p>	Compliant	None required	EACOP expedites the replacement of pending communally used water sources

**Audit Area 12: Management of Cultural and Heritage Sites**

**Compliance Requirements**

IFC PS8 para 1 recognizes the importance of cultural heritage for current and future generations. It requires that project proponents protect cultural heritage in the course of their project activities. The standard further requires a complete identification of such cultural heritage in consultation with the affected communities and the preparation of a chance finds procedure to manage chance finds<sup>10</sup>.

Furthermore, PS8 para 11 requires that where the project proponent has encountered tangible cultural heritage that is replicable and not critical, the project will apply mitigation measures that favor avoidance, minimization of impacts or restoration.

The Uganda Ministry of Health guidelines under the Public Health Act Cap 281 require the exhumation and relocation to be undertaken by professional undertakers and in line with religious and cultural beliefs of the affected families as well as public health requirements.

The key findings on this audit area are presented below:

- Identification of cultural heritage
- Exhumation and relocation of identified cultural heritage property in accordance with established procedures.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Identification of cultural heritage	The Project identified 668 graves and 29 shrines as the cultural heritage in the Project footprint in consultation with affected families and relatives.  The Project also identified archaeological finds such as half pots, arrowhead, cow skull, and archaeological pots on Pumping Station (PS) - 02 & Main Camp & Pipe Yards (MCPY) -04 which have been appropriately managed.	Compliant	None required	None required
2.	Exhumation and relocation of identified cultural heritage	EACOP completed the relocation and compensation for all identified graves and shrines, adhering to cultural and religious practices in full compliance	Compliant	None required	None required

<sup>10</sup> Tangible cultural heritage encountered unexpectedly during project construction or operation.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
	property in accordance with established procedures	<p>with IFC PS 8 and the Uganda Ministry of Health guidelines.</p> <p>EACOP also supported the affected families by paying for grave reburial ceremonies and ceremonies for shrines relocation.</p> <p>100% of the PAPs visited during the audit were satisfied with the relocation procedure and process followed.</p> <p>The Project also has an active chance finds procedure that guides in case of chance finds.</p>			

**Audit Area 13: Issuance of Notices to Vacate (NTV) and Avoidance of Forced Eviction**

**Compliance Requirements**

The IFC PS5 para 3 & 9 requires project proponents to avoid forced evictions and only take possession of acquired land and related assets after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation.

In addition, Article 26(2) of the Constitution of the Republic of Uganda includes a requirement for prompt payment of fair and adequate compensation, prior to taking possession or acquiring the property.

This audit area was assessed on the following key requirements:

- Issuance of NTVs after compensation
- Avoidance of forced eviction.

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas for Improvement
1.	Issuance of NTVs	A total of 3,457 NTVs were issued to PAPs who had been fully compensated as per the Project Implementation Summary dated 28 October 2024.  Of the sampled PAHs (638) in the audit survey, 91% confirmed they received NTVs and only after receipt of compensation.	Compliant	None required	None required
2.	Avoidance of forced eviction	There was no case of forced eviction established by the audit, including those PAPs with expired NTVs.	Compliant	None required	None required

#### Audit Area 14: Project Land Titling and Transfer

##### Compliance Requirements

IFC PS5 para 9 requires the project proponent to only take possession after compensation for the land. In addition, Article 26(2) of the Constitution of the Republic of Uganda includes a requirement for prompt payment of fair and adequate compensation prior to taking possession or acquiring the property.

Section 11 of the East African Crude Oil Pipeline (EACOP) Act (Special Provisions) Act, 2021, provides that the EACOP project constitutes public works within the meaning of Section 1 of the Land Act and that the Uganda Land Commission shall grant land rights to enable the Project company to undertake all Project activities.

This audit area focused on the Titling/transfer of acquired Project land, and key findings are presented below:

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas of Improvement
1.	Titling/ transfer of the acquired land	EACOP is surveying and subdividing the acquired Project land in the names of the Uganda Land Commission (in accordance with the Project Host Government Agreement and Article 239 of the Constitution of the Republic of Uganda which mandates Uganda Land Commission to hold and manage any land in Uganda	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Actions	Recommended areas of Improvement
		<p>vested in or acquired by GoU in accordance with the provisions of the Constitution) and returning residual titles to PAPs.</p> <p>For all compensated sections of the PPL RoW and PAs, the Project has made significant progress in the subdivision, titling, and or transfer of the acquired land. As of 28 October 2024, the Project has been issued 346 leasehold titles in the names of EACOP for 226 out of 294 kilometres (or 76.3%) of the PPL RoW, only after payment of compensation.</p>			

**Audit Area 15: Governance, including human and financial resources**

**Compliance Requirements**

IFC PS1 para 17 requires the project proponent to establish, maintain, and strengthen as necessary an organisational structure that defines roles, responsibilities, and authority to implement the environmental and social performance of the project proponent. In addition, sufficient human and financial resources should be provided on an ongoing basis to achieve effective environmental and social performance.

Section 14.2 of the Project RAP Report also identified a number of stakeholders and actors with clear roles and responsibilities during the implementation of the Project RAP.

This audit area focused on Organisational capacity and competency, and key findings are presented below:

#	Requirement	Audit Findings	Compliance Level	Corrective Action	Recommended areas for Improvement
1.	Organisational capacity and competency	The audit confirmed that EACOP has a sufficiently structured organisation with competent human and financial resources to implement the Resettlement Action Plan (RAP) through to the end of the	Compliant	None required	None required

#	Requirement	Audit Findings	Compliance Level	Corrective Action	Recommended areas for Improvement
		<p>construction phase, including addressing corrective actions and unique case-specific needs.</p> <p>EACOP possesses an adequate organisational structure, with sufficient human and financial resources, to plan and implement its environmental and social performance as evidenced by the current overall progress of RAP implementation.</p> <p>EACOP is also committed to undertaking the corrective actions identified in this Audit Report and the forthcoming livelihood restoration external monitoring and reviews, as well as the Expost-RAP implementation evaluation.</p>			

# 1. Introduction

## 1.1 Project Background

The Government of Uganda and its Upstream Partners commenced development of the oil resources confirmed in the Lake Albert Basin in Uganda and are constructing a petroleum pipeline to export crude oil to international markets. The selected pipeline route is 1,443 kilometres long, of which 296 km will be in Uganda. The pipeline runs from Kabaale in Hoima District, Uganda, to Chongoleani, Tanga Region, in Tanzania. It passes through ten (10) Districts in Uganda, namely Hoima, Kikuube, Kakumiro, Kyankwanzi, Mubende, Gomba, Sembabule, Lwengo, Rakai, and Kyotera, traversing 171 villages.

In May 2017, Tanzania and Uganda signed the Inter-Governmental Agreement (IGA) which provides a legal basis for the implementation of the East African Crude Oil Pipeline (EACOP) project. Subsequently, individual Host Government Agreements (HGAs) were required due to the project's transboundary nature.

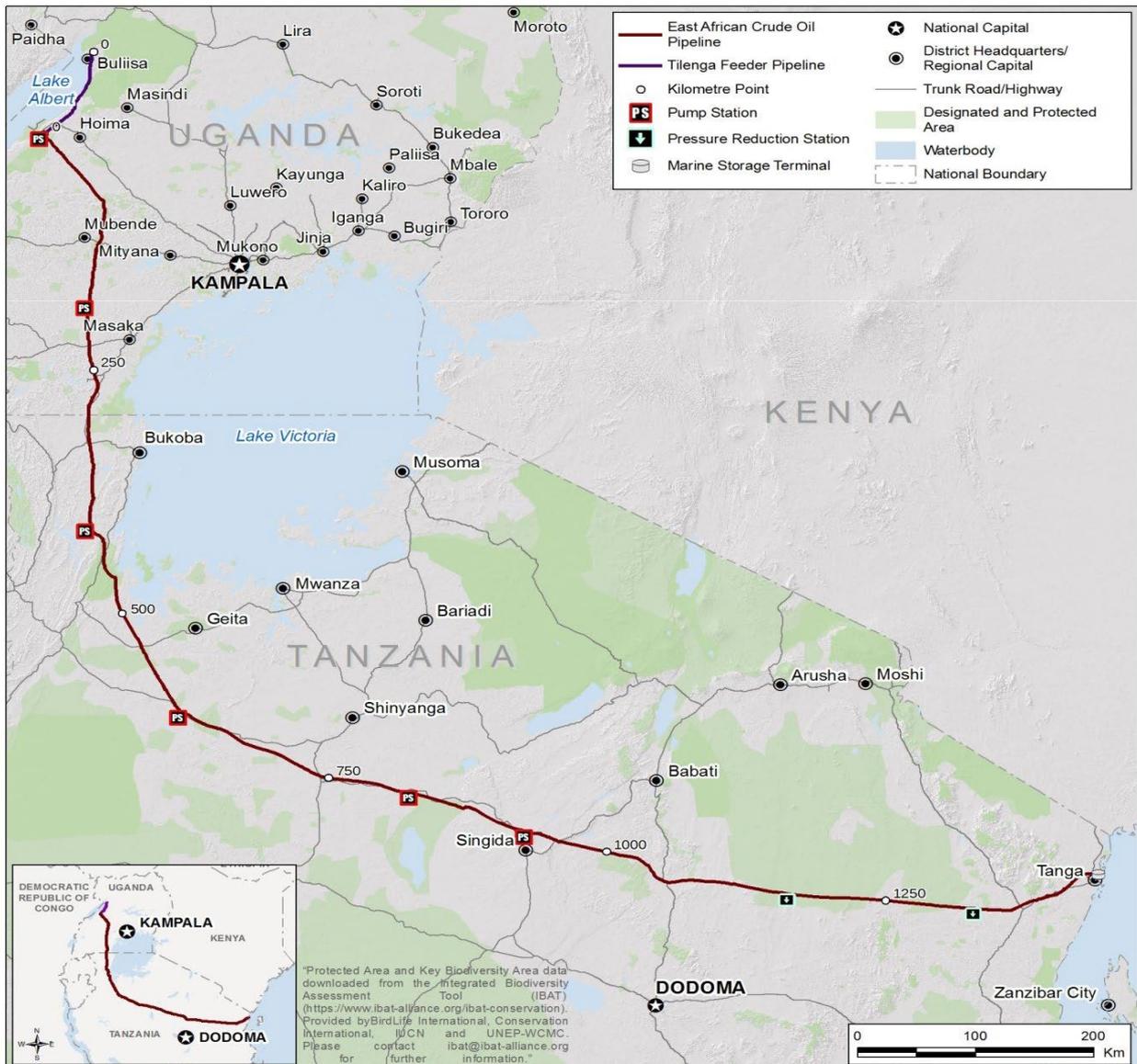
To harness the full potential of this resource, the Governments of Uganda (GoU) and Tanzania (GoT) partnered with the Upstream Partners to construct the East African Crude Oil Pipeline (EACOP) ("the Project").

To implement the project in Uganda, it requires access to approximately 2,740 acres of land. Approximately 90% of the land relates to the 30m wide pipeline (PPL) corridor and approximately 10% relates to Above-Ground Installations (AGIs). The remaining land will be used for construction facilities and access roads, as follows:

- **Pipeline Corridor and AGIs** (approximately 2,523 acres / 1,021 hectares) comprising:
  - A 296 km long export buried pipeline will be constructed within a 30 m wide corridor at an average depth of between 1.8 m and 2 m, with some widening at certain locations for additional temporary workspace.
  - A permanent AGI Pump Station 1 (PS-1) and approximately 1.5 km of the pipeline corridor will be situated in Kabalega Industrial Park (KIP), which has already been acquired by GoU.
  - A permanent AGI Pump Station 2 (PS-2) with a helipad and access road will be built in Sembabule.
  - Other AGIs such as the main line valve stations and electric heat tracing sub-stations, all of which will be located within the pipeline corridor.
- **Construction Facilities** (approximately 217 acres / 88 hectares) comprising: four Main Camp & Pipe Yards (MCPYs) (MCPY-01, MCPY-02, MCPY-03 and MCPY-04) and access roads to MCPY-03 and MCPY-04. These camps are designed to accommodate approximately 800-1,000 workers and have been chosen based on several factors, including minimizing the daily commute from the camp to the work site. The MCPYs will be located on agricultural land with minimal impact on residential properties. They will be established along the corridor in Uganda to house workers and store line pipe before distributing it along the pipeline corridor. The selected sites for these MCPYs are:
  - MCPY-01: Kakumiro District (Kilometre Point (KP) 39.3),
  - MCPY-02: Mubende District (KP 124.6),

- MCPY-03: Sembabule District (KP 191.2), and
- MCPY-04: Kyotera District (KP 282).

Figure 1: Pipeline Route through Uganda and Tanzania<sup>11</sup>



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The Project requires the acquisition of land on a permanent basis for the pipeline corridor, access roads, AGIs, pipe yards, and construction camps. The acquisition of land will result in the involuntary resettlement of affected communities, which is why a Resettlement Action Plan (RAP) was prepared. EACOP is acquiring the land on behalf of the GoU, GOU will own the acquired land needed for the project on a permanent basis and GoU will lease the land to EACOP for the Project's use under an arrangement set out in the Host Government Agreement (HGA).

The Project will require certain areas of land for a limited duration to support the construction, commissioning, and decommissioning of construction facilities in priority areas (PAs), namely MCPY-01 through MCPY-04. After the construction and decommissioning, the land for PAs will be returned to the relevant state agency. Additionally, the Project will require land for permanent

<sup>11</sup> The Tilenga Feeder pipeline is a separate Tilenga upstream project component and not part of EACOP.

operational facilities for the pipeline, which will be used for a longer duration. Once the operation ends, the land will be returned to the relevant state agency as well.

### 1.1.1 RAP Preparation

The RAP preparation activities were conducted from 2018 to 2021. The final RAP Report for EACOP Uganda was published and disclosed in April 2021 following reviews and approvals by Total East Africa Midstream B.V. (TEAM B.V.) and the GoU, represented by the Ministry of Energy and Mineral Development (MEMD), Chief Government Valuer (CGV) in the Ministry of Lands Housing and Urban Development (MLHUD). The suspension of the Project in 2019 and the COVID-19 pandemic contributed to the delay in completion of the RAP preparation phase.

The RAP details the approach to land acquisition to meet Ugandan legal and international finance requirements, specifically, the World Bank Environmental and Social Framework<sup>12</sup> (ESF) as well as the IFC Performance Standards on Environmental and Social Sustainability (2012). The RAP is available on the EACOP website: <https://eacop.com/eacop-rap-uganda/>

The Project Lenders Environmental and Social Consultant (LESC) undertakes Environmental and Social Due Diligence (ESDD), and they concluded in their previous ESDD reports that the land acquisition and resettlement documentation complies with IFC Performance Standards. The LESC's most recent ESDD Report is available on the EACOP website: <https://www.eacop.com/report/environment-and-social-due-diligence-esdd-non-technical-summary-nts/>

Some of the key points in the above RAP include:

- **Permanent Land Requirements:** The Project's permanent land requirements cover the crude oil pipeline corridor, Above Ground Installations (AGIs) such as pump stations, access roads, and four construction camps and pipe yards. These land requirements total approximately 2,740 acres or approximately 1,109 hectares. A summary of land acquisition requirements and impacts as presented in the RAP is provided in Table 1 below.
- **Legal Framework and Standards:** The land acquisition and resettlement planning adhere to the Ugandan legal framework and international good practice (IGP) standards, including the IFC's Performance Standards<sup>13</sup>. This ensures that the process follows established guidelines and safeguards. Chapter 3 and Appendix A of the Project RAP covers the applicable Policy, Legal, & Institutional Framework.
- **Consultation and Participation:** The Project involved consultation with affected communities and participatory planning. Grievance management and monitoring, and evaluation mechanisms are also in place to address any issues that may arise during the process. Specifically, Chapter 15 of the RAP covers Monitoring, Evaluation, and Reporting. It sets out the Project's plan for monitoring and evaluation (M&E) and corresponds with IFC PS5 requirements.

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<sup>13</sup> <https://eacop.com/wp-content/uploads/2022/07/appendix-k-resettlement-policy-strategy-uganda.pdf>

Table 1: EACOP Uganda: Project Land Requirements and Project Affected Persons (PAPs)

#	RAP Metrics	Hoima	Kikuube	Kakumiro	Kyanwanzu	Mubende	Gomba	Sembabule	Lweingo	Rakai	Kyotera	MCPY1 Kakumiro	MCPY2 Mubende	MCPY3 Sembabule	PS2 Sembabule	MCPY4 Kyotera	TOTAL
1	Km of Pipeline	5.4	30.4	33.4	14.7	63.7	17.0	52.6	26.2	19.9	32.3						296
2	Number of villages with project affected land	1	20	25	8	26	3	32	19	17	20	(1)	(1)	(1)	(1)	(3)	171
3	Gross land take (acres)	74	252	264	120	565	139	473	217	163	256	47	47	61		62	2,740
4	Land Take to be compensated (acres)	34	233	222	73	472	133	373	198	142	232	47	47	61		54	2,321
5	Total number of PAPs	83	396	325	212	660	41	416	529	349	504	32	15	48	10	40	3,660
6	% of total number of PAPs	2%	11%	9%	6%	18%	1%	11%	14%	10%	14%	1%	0%	1%	0%	1%	100%
7	Number of PAPs with affected land interests	73	338	290	145	545	25	356	452	316	444	33	8	37		34	3,096
8	Total number of licensee PAPs	19	72	46	82	105	19	77	113	55	80	8	3	13		4	696
9	No. of physically displaced households (loss of dwelling)	8	44	12	13	59		14	18	8	12			2	3	2	195

**Notes:**

1. Gross land taken includes Government land, such as in the Taala Central Forest Reserve, wetlands, and streams, which is not being compensated for. The figures do not include relatively small areas of land not surveyed or valued due to ongoing rectification issues, legal and family disputes, and land not yet accessible. In Hoima, a total of 74 acres affected includes approximately 40 acres within Kabalega Industrial Park (KIP) which are not being compensated for under EACOP.
2. Land interests refers to legally recognisable rights or claims to land ownership, including: Customary, Mailo, Freehold, Leasehold, and Lawful & Bonafide Occupants<sup>14</sup>.
3. Licensee PAPs do not possess an ownership interest in land. They typically own crops, trees or structures on land owned by others.
4. Out of the 195 physically displaced PAPs (PDP) eligible for a replacement house option or monetary compensation, 20 PDP selected monetary compensation, and 175 PDP selected the replacement house option. In total, 177 replacement houses have been constructed (2 of the 175 PDPs had 2 replacement houses constructed). Within the 195 PDP, 34 licensee PAPs own affected houses and eligibility of these PAPs for replacement housing was assessed on a case-by-case basis, 25 of 34 received replacement houses and 9 received monetary compensation.

<sup>14</sup> Lawful and Bonafide Occupants are popularly known as Kibanja Landholders.

### 1.1.2 RAP Implementation

Following conclusion of the RAP Preparation phase, the RAP Implementation phase commenced in April 2021 and is ongoing as at October 2024. Section 16-2 of the EACOP RAP shows the sequence of the main activities that are being undertaken. It should be noted that the activities are happening concurrently across villages and districts according to the construction requirements for land access.

The payment of compensation to Project Affected Persons (PAPs) started in December 2021. Final Investment Decision (FID) was taken in February 2022. The current RAP implementation status is summarized in the Table 2 below.

Table 2: RAP Implementation Activities Status as of 28 October 2024

#	RAP Implementation Activity	Status	Remarks
1.	Ongoing engagement with PAPs, affected communities, and other stakeholders	<ul style="list-style-type: none"> <li>• EACOP has ongoing engagement of PAPs, affected communities, and stakeholders to keep them informed of existing activities (such as the livelihood restoration on package options and choices, services received by PAPs, and progress on implementation for all stakeholders, updating vulnerability data, GBV engagement) and forthcoming construction activities.</li> <li>• EACOP is currently preparing for the rollout of information and communication roadshows along the PPL route, and a third round of Financial Literacy Training (FLT).</li> <li>• EACOP rolled out campaigns to promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated, to share information about project activities, opportunities, and responsibilities. Campaigns will additionally: <ul style="list-style-type: none"> <li>○ Update communities about commencement of works, periodic status, and progress of construction activities, as well as provide up-to-date environmental, community health, and safety information.</li> <li>○ Disclose risks related to project activities and explain mitigation measures put in place and going forward. Such information is best illustrated using Information, Education, and Communication (IEC) materials.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Engagement is an ongoing / continuous process associated with RAP implementation and forthcoming construction.</li> </ul>

#	RAP Implementation Activity	Status	Remarks
		<ul style="list-style-type: none"> <li>○ Provide community members a means to articulate concerns and ask questions about the Project.</li> <li>○ Notify the project-affected communities of any outstanding requirement support needed by the Project, especially labor and the associated employment process.</li> <li>○ Remind the Project-affected communities of the EACOP grievance management system and key points for the Project.</li> <li>○ Obtain and maintain an interface between the project and communities to bridge communication/ information sharing gaps. This will ease the receipt of feedback on any other issues, as well as seeking feedback on mitigation measures being implemented.</li> <li>○ Seek inclusiveness in representation of views, including women, vulnerable, and minority groups.</li> </ul>	
2.	Bank account opening for PAPs, including joint accounts for PAPs with spouses	<ul style="list-style-type: none"> <li>● Bank account opening is complete except for approximately 35 PAPs (comprising: 17 Absentee PAPs, 3 PAPs awaiting Letters of Administration (LoAs) to sign CAs, 7 Other PAPs who had not signed CAs, 5 PAPs who deceased after signing CA for whom an Estate Bank Account was needed, and 3 Succession Register PAPs).</li> <li>● EACOP currently preparing for a third round of Financial Literacy Training (FLT).</li> </ul>	<ul style="list-style-type: none"> <li>● EACOP continues to engage these remaining PAPs to open bank accounts to enable payment.</li> </ul>
3.	Entitlement Briefings for PAPs, including access to Third Party legal advice	<ul style="list-style-type: none"> <li>● Entitlement Briefings completed for 99% (3,627) PAPs.</li> <li>● Ongoing EB/CA signing for 6 PAPs. These are PAPs who had LoAs issued recently that prevented earlier EB/CA signing.</li> <li>● In addition to these 6 PAPs, EACOP will undertake EB/CA signing with 3 other PAPs once their LOAs are issued.</li> <li>● Once CGV has approved the Kakumiro PPL Re-route Valuation Report, EACOP will undertake EB/CA signing.</li> </ul>	<ul style="list-style-type: none"> <li>● The remaining EB/CA signings relate to deceased PAPs who have required LoA to appoint legally recognised Administrators to sign the CAs</li> <li>● The LoA process for some PAPs has been lengthy.</li> </ul>

#	RAP Implementation Activity	Status	Remarks
4.	Compensation Agreement (CA) signing. These are tripartite agreements signed by the PAP (as well as signed spousal agreement), EACOP Project and GoU. GoU is acquiring the land to be leased to the Project per the Host Government Agreement (HGA)	<ul style="list-style-type: none"> <li>• 3,627 (99%) out of 3,660 PAPs signed CAs. 72 signed CAs are as a result of the Escrow Court rulings.</li> <li>• 33 PAPs have not yet signed CAs.</li> </ul>	<p>The 33 PAPs not signed CA are comprised of:</p> <ul style="list-style-type: none"> <li>• 24 Unidentified PAPs – these were originally in the Escrow list but Attorney General (AG) instructed that they should be removed from Escrow and addressed via the District Land Boards (DLBs). The DLBs requested the AG to issue instructions – EACOP is waiting for AG to issue these instructions.</li> <li>• 6 PAPs for EB/CA signing – currently being engaged by EACOP for EB/CA signing (these are PAPs who had LOAs issued recently).</li> <li>• 3 PAPs awaiting LOAs – EACOP is in process of assisting PAPs in obtaining these LOAs.</li> </ul>
5.	Compensation Payment to PAPs	<ul style="list-style-type: none"> <li>• 3,567 (97%) out of 3,660 PAPs have been paid. These include 44 Escrow PAPs paid.</li> </ul>	<p>Actions to complete 60 pending payment of PAPs with signed CAs are:</p> <ul style="list-style-type: none"> <li>• 28 Escrow PAPs to be paid to Court once the Project received confirmation of the Court bank accounts for Hoima and Mubende Courts</li> <li>• 32 PAPs who signed CA not yet paid – these PAPs have issues such as caveats on land titles or awaiting LoA for recently deceased PAPs.</li> </ul>

#	RAP Implementation Activity	Status	Remarks
6.	Construction of Replacement Houses for Physically Displaced PAPs	<ul style="list-style-type: none"> <li>All 177 Replacement Houses completed and handed over to PAPs</li> </ul>	
7.	Vulnerable Persons Assistance	<ul style="list-style-type: none"> <li>Ongoing assistance to vulnerable PAPs</li> <li>Ongoing surveying to update on PAP vulnerability status.</li> </ul>	<ul style="list-style-type: none"> <li>Relocation assistance is being targeted to vulnerable PAPs to assist them in vacating the land.</li> </ul>
8.	Grievance Management	<ul style="list-style-type: none"> <li>995 grievances registered</li> <li>977 of 995 grievances registered have been resolved and closed</li> <li>18 grievances are open.</li> </ul>	<ul style="list-style-type: none"> <li>EACOP continues to engage PAPs and stakeholders (such as District Consultative Committees) to resolve outstanding grievances (currently 18 open).</li> </ul>
9.	Preparation of Supplementary Valuation Reports (VR)	<ul style="list-style-type: none"> <li>One Supplementary VR is being prepared (Supp VR MOP UP 4) – containing 6 PAPs with Supplementary CAs to sign.</li> <li>The Kakumiro PPL Re-route VR (containing 64 PAPs) is currently with CGV for approval. Approval is expected in November 2024, then EB/CA signing will follow.</li> </ul> <p>Note: 3,660 PAPs do not include the 64 PAPs in the Kakumiro PPL Re-route VR</p>	<ul style="list-style-type: none"> <li>SUPP VR MOP UP 4 is expected to be submitted to GOU for approval in November 2024. Then EB/CA signing in November / December 2024.</li> <li>Submission of the Kakumiro PPL Re-route VR to CGV was affected by lengthy discussions and engagements with MEMD and PAU.</li> <li>Once Kakumiro PPL Re-route VR is approved by CGV (November), EB/CA signing will follow and pay PAPs' compensation thereafter.</li> </ul>
10.	Issuing of Notices to Vacate (NTVs) to PAPs – 3-month notice period	<ul style="list-style-type: none"> <li>NTVs for 3,457 paid PAPs (94%) have been issued.</li> <li>NTVs for 3,414 PAPs (93%) have expired (3 months).</li> <li>43 NTVs that have been issued will expire in November/ December 2024.</li> <li>110 paid PAPs have not yet been issued NTVs.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing issuance of NTVs is underway.</li> <li>Some PAPs with land titles have refused to accept their NTV until their residual land title is returned (post removal of EACOP corridor from the title). This affects</li> </ul>

#	RAP Implementation Activity	Status	Remarks
			<p>approximately 30 PAPs and is being delayed by delays at GoU Ministry Zonal Offices (MZOs) of the MLHUD in processing titles.</p> <ul style="list-style-type: none"> <li>EACOP has prepared NTVs for 72 Escrow PAPs which are being issued after EACOP deposits compensation to Courts (3 of 5 Court payments had been made as at 28 October 2024).</li> </ul>
11.	Delivering Transitional Support (food baskets) to eligible Project Affected Households (PAH) for periods of 6 or 12 months depending on Project Impacts and Relocation Assistance	<ul style="list-style-type: none"> <li>Delivery of Transitional Support in form of food baskets has commenced for 86% of 2,257 eligible PAPs and completed for 46%. This is for stabilising their food security in the short term. These PAPs are also enrolled on Agricultural Programs to improve their production</li> <li>All the 177 physically displaced PAPs were offered relocation support. This was in form of transport, fumigation, and labour for movement of their assets.</li> </ul>	Enrolment on transitional support is dependent on signing of CAs and Expiry of notices to vacate. Eligible but not enrolled PAPs still have access to their Land.
12.	Graves and Shrines Relocation	<ul style="list-style-type: none"> <li>All 668 affected graves have been relocated, including 9 chance finds graves identified at the Priority Areas: <ul style="list-style-type: none"> <li>02 graves - MCPY4 (Kyotera)</li> <li>02 graves - MCPY2 (Mubende)</li> <li>05 graves - PS2 (Sembabule)</li> </ul> </li> <li>All 29 shrines have been relocated.</li> </ul>	
13.	Delivering Livelihood Restoration support for eligible PAHs, including gathering of additional livelihood data	<ul style="list-style-type: none"> <li>Delivery of Livelihood Restoration (LR) Support has commenced for 86% of 3,400 eligible PAPs. LR will be ongoing for 2 to 3 years</li> <li>Data being recorded at PAP level in livelihood restoration Passports or Logbooks for activities participated in or benefits received. Monitoring and implementation data also being collected in Kobo collect.</li> </ul>	<ul style="list-style-type: none"> <li>RAP recommends a broad scope of work vis-a-vis the Project timelines.</li> <li>Activities phased in the RAP with assessment on progress informing</li> </ul>

#	RAP Implementation Activity	Status	Remarks
			<p>interventions in the next phase until restoration</p> <ul style="list-style-type: none"> <li>• LR Contractors have insufficient cashflow to pre-finance LR support activities.</li> <li>• Several PAPs have moved and reside out of the Project districts where LR is being implemented, others have been unreachable while some opted not to participate, others have not yet signed their CAs.</li> </ul>
14.	Processing of land titles to transfer affected land from PAPs into ownership of the Government of Uganda	<ul style="list-style-type: none"> <li>• 79% surveying complete (based on acreage)</li> <li>• 346 of ~650 EACOP leases signed by EACOP and Uganda Land Commission (ULC)</li> <li>• 67 EACOP leases signed by EACOP and are pending ULC's signature.</li> <li>• 346 of ~650 leasehold titles had been issued to EACOP by Land Office as at 28 October 2024.</li> </ul>	<p>Progress with retitling of land from PAPs to GoU has been slowed by:</p> <ul style="list-style-type: none"> <li>• Delays at the GoU Ministry Zonal Offices (MZOs) of the MLHUD and the upgrade of the national land information system</li> <li>• Technical challenges at Mityana and Masaka MZOs like cadastral inconsistencies and need for block closures in National Land Information System (NLIS).</li> </ul>

Source: EACOP Uganda RAP Implementation Activities Status Updates as of 28 October 2024

## 1.2 External RAP Implementation Audit Objectives

The main objectives were:

- To assess all RAP implementation activities.
- To appraise compliance with the requirements of the IFC Performance Standards (in particular PS1, 5 and 8), and national legislation.
- To provide a Corrective Action Plan (CAP) based on the identified areas of improvement.
- To provide recommendations for development opportunities for Project Affected Communities targeting non-PAPs to avoid potential community conflicts and stimulate lasting effect of EACOP’s activities in the minimisation of gender-based violence and the maximisation of harmony between spouses, family members, and wider community members.

The RAP Implementation Audit scope covers the period of RAP Implementation activities up to 28 October 2024.

## 1.3 Report Structure

This Report is comprised of the following main sections in Table 3 below.

Table 3: Report Format Sections

<b>Section #</b>	<b>Description</b>
	Executive Summary
1.	Introduction
2.	RAP Implementation Audit Framework
3.	Audit Reference Framework
4.	Audit Approach and Methodology
5.	Audit Findings
6.	Compliance Corrective Action Plan (CAP)
7.	Recommendations for Improvement

## 2. RAP Implementation Audit Framework

This framework guides the process used to conduct this RAP implementation audit providing the key audit areas, the targeted indicators, the audit objectives and questions, and the audit approaches and data sources. This framework in Table 4 below is predominantly based on Uganda legislation and policies, IFC Performance Standards (2012), the IFC Good Practice Handbook: Land Acquisition and Involuntary Resettlement (2024) and EACOP RAP for Uganda:

Table 4: RAP Implementation Audit Framework

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
1. Stakeholder participation and disclosure	<ul style="list-style-type: none"> <li>• Disclosure of Information.</li> <li>• Consultation.</li> <li>• Informed Consultation and Participation.</li> </ul> <p>(IFC PS 1 &amp; 5, Uganda, Land Acquisition Act 1965)</p>	<ul style="list-style-type: none"> <li>1.1 Number of meetings conducted with PAPs.</li> <li>1.2 Number of PAPs participated in meetings disaggregated by gender.</li> <li>1.3 PAPs' satisfaction with RAP and LRP information and consultation.</li> <li>1.4 Satisfaction of women with obtaining and incorporating women's perspectives.</li> </ul>	<ul style="list-style-type: none"> <li>• Review whether PAPs were appropriately informed (through disclosure of appropriate project information in a timely, understandable, accessible, and appropriate manner and format) – disclosure processes.</li> <li>• Review whether PAPs were explicitly informed of their right to continue cultivating their land with seasonal crops until they are required to vacate the land.</li> <li>• Review whether PAPs were explicitly informed on the available assistance for PAPs (e.g. Letters of Administration, access to Third-Party legal advice).</li> <li>• Review whether PAPs have been adequately and sufficiently consulted during the RAP planning and implementation process</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder engagement records indicate particular attention to engaging with women and vulnerable groups including Borealis records</li> <li>• FGDs with PAPs, women, and vulnerable groups</li> <li>• Review of documents, including minutes and attendance lists to the meetings with PAPs</li> <li>• Minutes and MoUs with government agencies in charge</li> </ul>

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
			including options and alternatives (on e.g. in-kind versus monetary compensation, livelihood development design, resettlement locations).	of delivering social welfare services <ul style="list-style-type: none"> <li>• KIIs with EACOP, CSOs &amp; District Consultative Committees (DCCs)</li> <li>• PAH Survey</li> </ul>
2. Compensation Determination	<ul style="list-style-type: none"> <li>• PAP identification and eligibility.</li> <li>• Identification and Inventory of Affected Assets.</li> <li>• Determination of compensation at full replacement cost<sup>15</sup>.</li> </ul> (IFC PS5 and Section 77 Land Act Cap 227 as amended).	2.1 Number of PAPs who participated in compensation determination. 2.2 PAPs' satisfaction with the process of compensation & entitlement determination.	<ul style="list-style-type: none"> <li>• Review whether land and assets recorded in assessments and valuation reports were accurately reflected in compensation agreements and compensation paid to PAPs.</li> <li>• Review whether PAPs were consulted on compensation rates and strip maps.</li> <li>• Assess whether compensation is at full replacement cost.</li> <li>• Verify whether compensation rates were updated or whether (additional) updates may be necessary, based on quantitative price surveys done internally by the project</li> </ul>	<ul style="list-style-type: none"> <li>• Review of Approved Valuation and Land Market Survey Reports</li> <li>• PAH Survey</li> <li>• FGDs with PAPs</li> <li>• Key Informant Interviews with Local Leaders/DCCs</li> <li>• Key Informants' Interviews with EACOP, LESC, DCCs &amp; Chief Government Valuer (CGV)</li> </ul>

<sup>15</sup> Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow affected communities and persons to replace lost assets with assets of similar value.

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
			(including review of valuation of land, crops and properties).	
3. Compensation Payment	<ul style="list-style-type: none"> <li>Land acquisition should only take place after compensation has been made available (where not possible, e.g., in case of land ownership disputes, compensation funds shall be made available, e.g., through escrow account deposit before displacement).</li> <li>Compensation Assistance.</li> <li>Compensation standards should be transparent and applied consistently to all communities and persons affected by the displacement.</li> </ul> <p>(IFC PS5 and Article 26(2) of the Constitution)</p>	<p>3.1 Number of PAPs provided with compensation assistance.</p> <p>3.2 Number of PAPs paid the compensation at full replacement cost.</p> <p>3.3 Number of PAPs paid compensation based on updated reviews.</p> <p>3.4 Number of PAPs paid the statutory compensation<sup>16</sup>.</p> <p>3.5 Number of monetary compensated PAPs that replaced their properties and assets of similar value. Average time between signing of compensation agreements and payment.</p> <p>3.6 Number of PAPs issued the documentation of ownership or occupancy and bank accounts in the names of both spouses or of women heads of households.</p> <p>3.7 Number of PAHs:</p> <ul style="list-style-type: none"> <li>who selected replacement housing.</li> </ul>	<ul style="list-style-type: none"> <li>Review whether in-kind and monetary compensation were delivered to PAPs (for impacts identified in the RAP Planning) and on time (prior to taking possession of land or assets) - RAP compensation for all PAPs</li> <li>Verify that statutory disturbance allowance was paid as per national legislation.</li> <li>Verify that amounts signed for in Compensation Agreements (statutory and EACOP Uplift) were paid to PAPs.</li> <li>Verify that compensation entitlements described in the RAP have been delivered.</li> <li>Review measures taken to avoid or mitigate the potential negative effects of monetary compensation, including training in cash management and other activities (for physically displaced persons who chose monetary</li> </ul>	<ul style="list-style-type: none"> <li>Review of the compensation records and payment vouchers/cheques</li> <li>PAH Survey</li> <li>FGDs with PAPs</li> <li>Key Informants' Interviews with EACOP, DCCs, CGV, &amp; IBLAC</li> <li>Training records and content</li> <li>Financial Literacy training records and content</li> <li>Site visit/observation to areas that were subject to updated reviews</li> </ul>

<sup>16</sup> Statutory disturbance allowance as per national legislation. The Land Act Cap 227 as amended provides for a disturbance allowance on top of the computed compensation amount as (a) 30% of the compensation amount if notice to vacate is within 6 months; and, (b) 15% of the compensation amount if notice to vacate is more than 6 months.

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
	of the Republic of Uganda).	<ul style="list-style-type: none"> <li>• who selected monetary compensation</li> <li>• with sufficient access to social services.</li> </ul> <p>3.8 Number of compensations deposited into the escrow account.</p> <p>3.9 Number of PAPs who took possession of land and assets only after compensation was provided<sup>17</sup>.</p>	<p>compensation instead of replacement housing).</p> <ul style="list-style-type: none"> <li>• Review any assistance provided to PAPs, such as the processing of legal documents, including Letters of Administration, Powers of Attorney, Statutory Declaration, Deed Polls, NIRA death certificates, National Identification Cards, and Bank Accounts Opening.</li> <li>• Review bank account opening and Financial Literacy Training.</li> <li>• Review the processing of certificates of title for PAPs with incomplete or missing titles to enable compensation.</li> <li>• Assess whether monetary compensated PAPs moved to environmentally sensitive areas such as wetlands and other protected areas within the Project Area of Interest.</li> </ul>	
4. Vulnerable persons Assistance	<ul style="list-style-type: none"> <li>• Identification of Vulnerable Persons and groups.</li> </ul>	4.1 Number of gender issues related to compensation delivery and access to monetary compensation	<ul style="list-style-type: none"> <li>• Review whether the relocation assistance to physically displaced households and vulnerable PAPs was delivered.</li> </ul>	<ul style="list-style-type: none"> <li>• Review the vulnerable assistance program documents</li> </ul>

<sup>17</sup> Where this was not feasible: review case-by-case basis.

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
	<ul style="list-style-type: none"> <li>Particular attention should be paid to the needs of the poor and the vulnerable.</li> </ul> <p>(IFC PS 1 &amp; 5, National Gender Policy (2007), National Policy on Elimination of Gender Based Violence (2016), National Policy for Older Persons (2009), National Policy on Disability (2016), National Orphans and other Vulnerable Children (OVC) Policy (2004), and National Youth Policy (2016))</p>	<p>4.2 Number of vulnerable PAPs provided with measures to avoid or mitigate risks with monetary compensation, disaggregated by men and women</p> <p>4.3 Number of PAHs and vulnerable PAHs provided relocation assistance</p> <p>4.4 Number of PAHs previously identified as vulnerable that improved their status</p> <p>4.5 Number of PAHs previously identified as not vulnerable become vulnerable</p> <p>4.6 Satisfaction of vulnerable persons on effectiveness of vulnerable support programs</p> <p>4.7 Satisfaction of vulnerable resettled households with access to social networks<sup>18</sup></p> <p>4.8 Satisfaction of vulnerable persons with obtaining and incorporating their perspectives</p>	<ul style="list-style-type: none"> <li>Review any issues associated with engagement of women and vulnerable or disadvantaged persons (are there any barriers that are stopping vulnerable persons from engaging?).</li> <li>Assess the access of vulnerable groups to information</li> <li>Assess the access of vulnerable persons to support networks in the village</li> <li>Assess the changes experienced post displacement</li> <li>Appraise systems to identify, track, and assist vulnerable people, and assess compliance with the RAP.</li> <li>Check that all categories of potentially vulnerable people are adequately addressed by proper assistance measures and received support.</li> <li>Assess whether the Vulnerable Support Programs are sufficient and adequate to enable vulnerable persons and households to offset the</li> </ul>	<ul style="list-style-type: none"> <li>PAH Survey</li> <li>FGDs with vulnerable persons</li> <li>FGDs with women category</li> <li>Site visits &amp; observation of Vulnerable Persons Support results</li> <li>KIIs with EACOP, DCC, CSOs, &amp; Women Leaders</li> </ul>

<sup>18</sup> Social networks: resettled close to relatives and socio-economic infrastructure.

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
			<p>impacts. Are there any barriers for female headed households and vulnerable groups to achieve successful outcomes from support programs?</p> <ul style="list-style-type: none"> <li>• Review whether documentation of ownership or occupancy and compensation agreements and bank accounts are issued in the names of both spouses or of single women heads of households.</li> <li>• Review Support to women and other vulnerable categories in opening of bank accounts and accessing relevant supporting documents like land agreements and Local Council letters during RAP verification and implementation.</li> <li>• Review any gender issues associated with the delivery of compensation, including access, control, and decision making over monetary compensation by women and risks of gender-based violence and socio-economic suffering of women and children where compensation payment is delivered to the husband.</li> </ul>	

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
5. Delivery of transitional assistance	<ul style="list-style-type: none"> <li>Provision of Transitional Support (IFC PS5)</li> </ul>	5.1 Number of PAHs and vulnerable PAHs provided transitional support by: <ul style="list-style-type: none"> <li>Food Baskets</li> <li>Financial Literacy, Money Management, and family strengthening</li> </ul>	<ul style="list-style-type: none"> <li>Review whether transitional support was sufficiently and adequately delivered to eligible PAHs</li> <li>Review the quality of transitional support food baskets</li> </ul>	<ul style="list-style-type: none"> <li>Transitional Support Reports and records</li> <li>PAH Survey</li> <li>KIIs with EACOP, &amp; PAPs</li> <li>FGD with women &amp; vulnerable persons</li> </ul>
6. Livelihood restoration and improvement	<ul style="list-style-type: none"> <li>Provision of adequate livelihood restoration and improvement programs (IFC PS5)</li> </ul>	6.1 Percentage of eligible PAHs that received livelihood restoration support aggregated by support type 6.2 Proportion of eligible PAHs that received safety net support for alternative land for PAPs 6.3 Number of PAPs provided measures for affected natural resource-based livelihoods	<ul style="list-style-type: none"> <li>An interim assessment of the livelihood restoration and improvement activities by determining whether RAP measures have been effective in enhancing (or, at a minimum, restoring) affected persons' living standards and livelihoods.</li> <li>Review whether the safety net support for alternative agricultural land for Priority Area PAPs was sufficiently and adequately delivered.</li> <li>Review whether alternative income-earning opportunities were provided where replacement land was not appropriate.</li> <li>Were measures provided to allow continued access or access to alternative equivalent</li> </ul>	<ul style="list-style-type: none"> <li>Livelihoods restoration records and activity plans</li> <li>Key informants' Interviews with the EACOP, LESC, IBLAC, LRCs, LIPs, DCCs, and PAPs</li> <li>FGD with PAHs, Women, and Vulnerable Persons</li> <li>PAH Survey</li> </ul>

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
			livelihood-earning opportunities?	
7. Community Cohesion and Social Disarticulation	<ul style="list-style-type: none"> <li>Opportunities for displaced communities to derive appropriate development benefits from the project</li> </ul>	7.1 Number of interventions by the project for the benefit of project-affected communities	<ul style="list-style-type: none"> <li>Review whether there are programs implemented for the benefit of project-affected communities</li> </ul>	<ul style="list-style-type: none"> <li>Document reviews</li> <li>KIIs with EACOP, &amp; PAPs</li> <li>Site visits &amp; observation</li> </ul>
8. Implementation of Grievance Management Mechanisms	<ul style="list-style-type: none"> <li>Establishment of grievance mechanism (GM) early in the development phase.</li> <li>An accessible and responsive GM.</li> <li>PAPs awareness about GM.</li> <li>Grievance documentation and reporting.</li> <li>Recourse to alternative judicial or administrative remedies.</li> </ul> <p>(IFC PS1 &amp; 5)</p>	<p>8.1 PAP's awareness of grievance management mechanisms and avenues to log grievances.</p> <p>8.2 PAP's satisfaction with resolving RAP and LRP grievances.</p> <p>8.3 Number of grievances pending resolution.</p> <p>8.4 Number of grievances in each category fully resolved.</p>	<ul style="list-style-type: none"> <li>Review grievance management and resolution process.</li> <li>Review grievance records for evidence of any significant non-compliance or recurrent poor performance in RAP implementation or grievance management. Review its implementation against procedure.</li> <li>Check the accessibility, transparency, and documentation of the grievance management system.</li> <li>Review open and closed legal cases (if applicable). Check on any outstanding grievances and open court cases. Cross-check information after engagement with the aggrieved person.</li> </ul>	<ul style="list-style-type: none"> <li>Review of the grievance management records.</li> <li>Key informants' Interviews with the EACOP, DCCs, and PAPs.</li> <li>PAH Survey.</li> <li>Site Visits to sample grievances.</li> </ul>

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
9. Replacement land acquisition and processes	<ul style="list-style-type: none"> <li>Offer of replacement land (IFC PS5)</li> </ul>	9.1 Replacement land equivalent to the lost land provided to PAPs that opted for it.	<ul style="list-style-type: none"> <li>Review whether Physically Displaced PAPs getting replacement houses were assisted, where necessary, by EACOP in obtaining suitable land for replacement houses.</li> <li>Assess whether PAPs have been able to use their monetary compensation to purchase replacement land.</li> <li>Review whether replacement land options were provided</li> </ul>	<ul style="list-style-type: none"> <li>Records on EACOP support to PDP for replacement house land.</li> <li>PAH Survey.</li> <li>KIIs with PD PAPs.</li> </ul>
10. Replacement housing and tenure security	<ul style="list-style-type: none"> <li>Provision of adequate replacement housing to PAPs.</li> <li>Security of Tenure<sup>19</sup> for the replacement house land.</li> </ul> (IFC PS5)	10.1 Number of households compensated with the replacement houses. 10.2 Percentage of replacement houses that comply with the stated standards. 10.3 Percentage of replacement houses within access to service provision facilities (within 5 km radius).	<ul style="list-style-type: none"> <li>Review the adequacy, suitability, and long-term sustainability of resettlement housing, including sufficient access to health facilities, schools, roads, clean water, general water supply, and solid and liquid waste facilities.</li> <li>Have house owners been issued formal land tenure documentation?</li> <li>Have activities been completed on schedule and within budget?</li> </ul>	<ul style="list-style-type: none"> <li>Review of the replacement housing records.</li> <li>Site visits &amp; observation of the constructed replacement houses and availability of social services.</li> <li>PAH Survey.</li> <li>KIIs with EACOP, PD PAPs.</li> </ul>

<sup>19</sup> Security of tenure means that resettled individuals or communities are resettled to a site that they can legally occupy and where they are protected from the risk of eviction.

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
11. Restoration or improvement of affected communal property	<ul style="list-style-type: none"> <li>Efforts by the Project to avoid or minimize impacts on affected communal property.</li> <li>Restoration or improvement of affected communal property.</li> </ul> <p>(IFC PS5)</p>	<p>11.1 Number of communal water sources affected by the Project.</p> <p>11.2 Number of affected communal water sources that have been replaced.</p>	<ul style="list-style-type: none"> <li>Review the adequacy, suitability and long-term sustainability of replaced communal water sources including ownership of land on which they were replaced, operation and maintenance practices/procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Site visits &amp; observation of communal water sources.</li> <li>KII with EACOP &amp; DCC.</li> </ul>
12. Management of cultural and heritage sites	<ul style="list-style-type: none"> <li>Identification of cultural heritage.</li> <li>Exhumation and relocation of identified cultural heritage property in accordance with established procedures.</li> </ul> <p>(IFC PS8, and Public Health Act Cap 281)</p>	<p>12.1 Percentage of affected graves and shrines relocated and compensated.</p> <p>12.2 Number of affected graves and shrines relocated based on updated reviews and compensation.</p>	<ul style="list-style-type: none"> <li>Review whether the relocation of graves and shrines was sufficiently and adequately implemented.</li> <li>Review whether EACOP complied with Department of Health requirements in graves relocation.</li> </ul>	<ul style="list-style-type: none"> <li>Site visits and observations to cultural and heritage sites.</li> <li>PAH Survey.</li> <li>KIIs with EACOP &amp; Psychosocial Support Contractor.</li> </ul>
13. Issuance of Notices to Vacate (NTV) and avoidance of forced eviction	<ul style="list-style-type: none"> <li>Issuance of NTVs</li> <li>Avoidance of forced eviction</li> </ul> <p>(IFC PS5, and Article 26(2) of the Constitution of the Republic of Uganda)</p>	<p>13.1 Number of PAPs issued with NTVs.</p> <p>13.2 Number of PAPs who have vacated.</p>	<ul style="list-style-type: none"> <li>Assess whether NTVs were served in appropriate manner.</li> <li>Assess whether PAPs complied with NTVs.</li> <li>Assess whether there were no cases of forced evictions of PAPs without compensation.</li> </ul>	<ul style="list-style-type: none"> <li>Review of NTV Reports and records.</li> <li>PAHs Survey.</li> <li>KIIs with EACOP</li> </ul>

Audit Area	Compliance Requirements	Indicators	Audit Objective (s)/Questions	Approach and Methods and Data Sources
14. Project Land Titling and Transfer	<ul style="list-style-type: none"> <li>• Titling/ transfer of the acquired land (IFC PS5, and Article 26(2) of the Constitution of the Republic of Uganda)</li> </ul>	14.1 Acreage of Project Affected land for AGIs and Construction Facilities. 14.2 Acreage and Kilometres of Pipeline Right of Way. 14.3 Number of PAPs whose residual land titles have been returned by the Project.	<ul style="list-style-type: none"> <li>• Assess process and progress of land titling and transfer for AGIs and Construction Facilities land.</li> <li>• Assess process and progress of land titling and transfer for Pipeline Right of Way.</li> <li>• Assess progress of return of residual land titles to PAPs/land owners.</li> </ul>	<ul style="list-style-type: none"> <li>• Project Land Titling Reports.</li> </ul>
15. Governance, including human and financial resources	<ul style="list-style-type: none"> <li>• Organisational capacity and competency (IFC PS1)</li> </ul>	15.1 Number of staff and consultants (disaggregated by gender and language abilities) dedicated to engagement with PAPs related to RAP and livelihood restoration activities.  15.2 Number of human and financial resources for the implementation of potential corrective actions.	<ul style="list-style-type: none"> <li>• Assess whether there are any bottlenecks in staffing including the gender balance and language abilities of staff dedicated to engagement with affected communities, and training or capacity building requirements, including in relation to assistance to vulnerable people and livelihood restoration and improvement.</li> <li>• Compare progress against the initial schedule and assess whether any extensions may be needed, particularly in terms of resources.</li> </ul>	<ul style="list-style-type: none"> <li>• Records &amp; Reports on human and financial resources.</li> <li>• KIIs with EACOP.</li> </ul>

### 3. Audit Reference Framework

The Audit is based on the reference framework and compliance level rating which includes:

- IFC Performance Standards on Environmental and Social Sustainability (2012).
- IFC Good Practice Handbook: Land Acquisition and Involuntary Resettlement (2024).
- Applicable Uganda legislation as discussed in the RAP report, under Chapter 3.
- EACOP Uganda Resettlement Action Plan (RAP) Report commitments.
- Information and data received from EACOP as of 28 October 2024.

The main three (3) IFC Performance Standards and the Uganda Legal & Policy framework, and the Compliance Level Rating applicable to this Audit are discussed in the sections 3.1 - 3.2.2.8 below. Where applicable, other IFC Performance Standards, Ugandan laws, and policies have been referred to in this Audit.

#### 3.1 Applicable IFC Performance Standards

The main IFC Performance Standards applicable to this Audit are discussed in the sections below:

##### 3.1.1 IFC PS1 - Assessment and Management of Environmental and Social Risks and Impacts

This PS highlights the importance of managing environmental and social performance, as well as mitigating associated risks.

The key objectives of this standard that are relevant to this Project are to:

- Identify and evaluate environmental and social risks and impacts of the Project.
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, and, where residual impacts remain, compensate/offset for risks and impacts to workers, Affected Communities, and the environment.
- Promote improved environmental and social performance through the effective use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them, and to ensure that relevant environmental and social information is disclosed and disseminated.

##### 3.1.2 IFC PS5 - Land Acquisition and Involuntary Resettlement

IFC PS5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land.

Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) as a result of project-related land acquisition and/or restrictions on land use. Resettlement is considered involuntary when affected individuals or communities do not have the right to refuse land acquisition that result in displacement.

Para 2 states that unless properly managed, involuntary resettlement may result in long-term hardship and impoverishment for the affected communities and persons, as well as environmental damage and adverse socio-economic impacts in areas to which they have been displaced. For these reasons, involuntary resettlement should be avoided. However, where involuntary resettlement is unavoidable, it should be minimized and appropriate measures to mitigate adverse impacts on displaced persons and host communities should be carefully planned and implemented.

The specific objectives of PS5 are to:

- avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs.
- avoid forced eviction.
- anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition and/or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that all resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- improve, or restore, the livelihoods and standards of living of displaced persons.
- improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.

Displaced persons may be classified as persons:

- who have formal legal rights to the land or assets they occupy or use.
- who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under national law.
- who have no recognisable legal right or claim to the land or assets they occupy or use.

### 3.1.3 IFC PS8 - Cultural Heritage

This PS recognizes the importance of cultural heritage for current and future generations. Consistent with the Convention Concerning the Protection of the World Cultural and Natural Heritage, this PS aims to ensure that a project proponent protects cultural heritage in the course of their project activities.

One of the two central objectives of IFC PS8 is to protect cultural heritage from the adverse impacts of project activities and support its preservation.

## 3.2 Ugandan Legal & Policy Framework

The main Ugandan legislations applicable to this RAP Audit are presented in the sections below.

### 3.2.1 Legal Framework

#### 3.2.1.1 The Constitution of the Republic of Uganda

Article 237(1) of the Constitution vests all land in Uganda in the citizens of Uganda. However, under Article 237(2) (a), the Government or local government can acquire land in the public interest. Such acquisition is subject to the provisions of Article 26 (on protection from deprivation of property) which gives every person in Uganda a right to own property either individually or in association with others. Under Article 26(2), no person shall be

compulsorily deprived of property or any interest in or right over property of any description except where the following conditions are satisfied:

- The taking of possession or acquisition is necessary for public use or in the interest of defense, public safety, public order, public morality, or public health, and
- The compulsory taking of possession or acquisition of property is made under a law which makes provision for:
  - Prompt payment of fair and adequate compensation, prior to the taking of possession or acquisition of the property, and
  - A right of access to a court of law by any person who has an interest or right over the property.

#### 3.2.1.2 The Land Act, Cap 227 as Amended

Section 42 of the Land Act reaffirms the statutory power of compulsory acquisition conferred on the governments and local government under articles 237(2)(a) and 26(2) of the Constitution. Compensation is assessed in accordance with the valuation principles laid out in Section 77 of the Land Act Cap 227 as amended (on computation of compensation), briefly outlined below:

- Customary land value is the open market value of unimproved land
- The value of buildings on the land is calculated at open market value for urban areas and replacement cost for rural areas
- The value of standing crops on the land, excluding annual crops, is determined in accordance with the district compensation rates as set by District Land Boards. Annual crops could be harvested during the period of notice given to the owner
- In addition to the total sum assessed, if 6 months' notice to surrender possession is given, a disturbance allowance of 15% (of the total sum assessed) is paid; if less than 6 months' notice to surrender possession is given, a disturbance allowance of 30% (of the total sum assessed) is paid.

Section 73(3) of the Land Act requires a Project developer carrying out public works on land to promptly pay compensation to any person having an interest in the land for any damage caused to crops or buildings and for the land and materials taken or used for the works.

#### 3.2.1.3 Land Acquisition Act (1965)

The Land Acquisition Act makes provision for the procedures and methods of compulsory (eminent domain) acquisition of land for public purposes whether for temporary or permanent use. The Minister of Lands may authorize any person to enter the land, survey the land, dig, or bore the subsoil or any other thing necessary for ascertaining whether the land is suitable for a public purpose. The Government is to compensate any person who suffers damage as a result.

Section 5 of the Act requires notifications to affected or interested persons with information, such as particulars of land, available avenues of engagement with all persons having an interest in the land, among others.

#### 3.2.1.4 The Public Health Act, Cap 281 of 1935

The Act harmonises the law concerning the preservation of public health. Concerning grave relocation activities, Section 109 states that it is unlawful to exhume anybody or the remains of anybody, which may have been interred in any authorised cemetery or any other cemetery, burial ground or other place without a permit. This permit is only granted to the legal personal representative or next of kin of the person buried, or to his or her or their duly authorised agent.

Section 110 provides that the Minister of Health has the mandate to order the exhumation needed for the purposes of executing public works or any public purpose.

#### 3.2.1.5 East African Crude Oil Pipeline (EACOP) Act (Special Provisions) Act, 2021

This Act facilitates the implementation of the EACOP Project in Uganda. It provides for the implementation of Uganda's obligations under the Intergovernmental Agreement and the Host Government Agreement, and other related matters.

Section 11 of the Act provides that the EACOP project shall constitute public works under Section 1 of the Land Act. The Act requires the Uganda Land Commission or other relevant state authority to grant land rights to enable the project company undertake all project activities. It also provides that where land has been identified for implementation of project activities, compensation of project-affected persons and acquisition of the land shall be done in accordance with the laws of Uganda and the Host Government Agreement

#### 3.2.1.6 Petroleum (Exploration, Development and Production) Act, 2013

This Act provides for the licensing, exploration, and production of petroleum. The Act in accordance with article 244 of the Constitution, vests the entire property in, and the control of petroleum in its natural condition in, on or under any land or waters within Uganda, in the Government on behalf of the Republic of Uganda. Section 139 of the Act makes provisions for the compensation of disturbance of land surface rights of affected persons by petroleum activities

#### 3.2.1.7 The National Environment (Environmental and Social Assessment) Regulations, 2020

These regulations make provisions for issues to be considered in an environmental and social impact statement for a project. Among these are social considerations including land acquisition such as resettlement, compensation, impacts on displaced persons and host communities, impacts on existing land use and potential alternative land uses, and restrictions on land use.

#### 3.2.1.8 The Museums and Monuments Act, 2023

The Act makes provision for: the administrative structures for effective management of cultural and natural heritage, the classification of museums, development and management of museums and monuments, formalisation, control, and protection of tangible and associated intangible cultural heritage and works of art collection.

#### 3.2.1.9 Succession Act, Cap 162 as amended

An Act relating to succession issues, making specific provision for interests and powers not acquired or lost by marriage, succession to a deceased person's immovable and movable property, distribution of an intestate's property, effect of marriage and marriage settlements on property, wills and codicils, and execution of wills

The Act specifically provides for gender equality in accordance with Article 21 & 23 of the Constitution, refines the definition of customary heir (or heiress) to remove discrimination, provides for protection of principal residential property for the benefit of the surviving spouse and lineal descendants, revises the percentage distribution of the estate of an intestate, provides for appointment of a guardian for a child by either parent, provides for powers and duties of guardian, and provides for the duration of probate and letters of administration, and execution of will of deceased persons

#### 3.2.1.10 Equal Opportunities Commission Act, 2007

This Act gives effect to the Government of Uganda's constitutional mandate to eliminate discrimination and inequalities against any individual or group of persons on ground of sex, age, race, colour, ethnic origin, tribe, birth, creed or religion, health status, social or economic standing, political opinion or disability, and take affirmative action in favour of groups marginalized based on gender, age, disability or any other reason created by history, tradition or custom for redressing imbalances which exist against them.

#### 3.2.2 Policy Framework

##### 3.2.2.1 Guidelines for Compensation Assessment under Land Acquisition (GCALA), 2017

The government developed the Guidelines for Compensation Assessment under Land Acquisition to harmonize and improve the overall practice of valuation assessment to achieve fair and adequate compensation to project affected persons.

Section 6.2.2 provides specific guidelines for land valuation as follows:

- Where there is a general market demand for the land, the most common method of land valuation, is achieved through collecting and analysing data on recent sales from a willing seller and a willing buyer of a similar property
- Where there is no general market demand for the land, when for example there is no sales comparable available or when it is closed market, then the Residual or income approach may be used.

Section 6.4.2 gives Specific guidelines for valuation of structures as below:

- Permanent structures
  - Where the market information is available, replacement cost is equivalent to the market value considering Section 77 of the Land Act
  - Where such market signals are absent or inadequate, the replacement cost could be derived from the Contractor's method by the Bill of Quantity.
- Semi- permanent structure: Similar to valuation if permanent structures, valuation of semi-permanent structures should be based on replacement cost
- Incomplete buildings and structures: compensation for incomplete buildings and structures (as identified in the surveys at cut-off date) shall be based on assessment by an assessment officer and based on level of completion
- Structures with a Historic/ Cultural value: On cultural and relocation costs the assessor should be able to guide the affected PAPs on a justifiable package to take into consideration the social and cultural norms as required
- Buried structures/ Graves: The approved district compensation rates for the graves shall be applied.

Section 6.5 guides that the valuation of crops and trees on the land should use approved annual District Compensation rates. The authenticity of these rates shall be verified by the assessor against the controlled copy in the office of the CGV. In the absence of updated compensation rates, the rates for the immediate neighbouring District shall only be applied on approval of the CGV.

Section 5, principle 5 of the GCALA recommends that the compensation award should be reviewed annually at 15% if it has not been paid within one year from the project cut-off date.

### 3.2.2.2 National Environment Management Policy, 2017

The National Environment Management Policy's overall goal is to promote sustainable economic and social development that enhances environmental quality without compromising the ability of future generations to meet their needs. Therefore, the policy calls for the integration of environmental concerns into development policies, plans, and activities. A Resettlement Action Plan (RAP) is a social management tool developed to address the physical and/or economic displacement of PAPs. The policy stresses the importance of stakeholder participation in designing development projects and mitigation measures.

### 3.2.2.3 Uganda Gender Policy, 2007

The policy aims to guide national planning, resource allocation and implementation of development programs with a gender perspective by establishing a framework for identification and implementation of interventions designed to achieve gender equality and women's empowerment in Uganda.

In the context of this Project, the policy aims to redress the imbalances which arise from existing gender inequalities and promote women's participation in all Project stages as well as equal access to and control over significant economic resources and benefits. The policy also requires proper resettlement planning with due attention to gender disparities and needs, starting with equitable access to resources and gender-sensitive decision-making during resettlement (which is also provided for in Section 40 of the Land Act Cap 227 as amended that provides for spouses' consent in property matters).

The Project should take into consideration social vulnerabilities associated with gender and how, if not well managed can compromise participation and access of women in RAP implementation activities. Gender concerns should be considered and efforts made to involve women as a special group, as household members, property owners and or users and as members.

### 3.2.2.4 National Policy on Elimination of Gender Based Violence, 2016

The policy emphasizes early intervention to prevent re-victimisation of and long-term effects for girls, including interpersonal violence, sexual coercion, alcohol and drug abuse, and mental health problems, reporting cases of violence against children immediately.

### 3.2.2.5 National Policy for Older Persons, 2009

This policy obliges the Project to ensure that vulnerabilities associated with age are identified and appropriate response measures are integrated into RAP activities. All categories of vulnerable elderly PAPs should be identified, consulted, and their views considered. Special assistance measures for elderly PAP have to be implemented in the RAP, including representation in the grievance mechanism.

#### 3.2.2.6 National Policy on Disability, 2016

One of the policy objectives is to ensure that the capacity of Persons with Disabilities (PWDs) and their care-givers to access essential services and entitlements is enhanced. The Project should have measures and strategies of ensuring participation of PWDs in the planning, and implementation of the RAP activities.

#### 3.2.2.7 The Uganda National Youth Policy, 2016

This Policy is premised on the need to address a range of challenges faced by youth in the development processes. The Policy requires that RAPs be implemented in line with improving youth involvement and participation including representation on the grievance mechanism.

#### 3.2.2.8 Uganda National Culture Policy, 2006

This Policy provides for strategies to enhance the integration of culture into development in line with the Poverty Eradication Action Plan (PEAP, 2004). These strategies include advocating for culture, ensuring capacity building, ensuring research and documentation, promoting collaboration with stakeholders, and mobilising resources for culture. It also promotes culture as a form of capital with the potential to move people out of income poverty

#### 3.2.2.9 National Physical Planning Standards and Guidelines, 2011

These guidelines are a consolidation of existing standards relating to social, economic, and physical infrastructure provisions and serve as a government manual of criteria for determining the scale, location, and site requirements of various land uses and facilities. The standards should be applied with a degree of flexibility to ensure that the community at large benefits most from developments.

### 3.3 Gap Analysis between the IFC Performance Standards and Ugandan Legislation

Table 5 below presents a gap analysis between the IFC PS and Ugandan Legislation, and the mitigation measures to close the gaps as set out in the EACOP Uganda RAP Report Chapter 3, Table 3-9

Table 5: Comparison of Ugandan Legislation and IFC Performance Standards

Resettlement Topic	IFC Performance Standard	Ugandan Legal & Policy Framework	Gap	Mitigation measures
Consultation and Information Disclosure	Resettlement activities must be planned and implemented with appropriate disclosure of information, consultation and the informed participation of those affected including host communities in decision making. The perspectives of women, minority groups and other categories with special requirements must be obtained and their interests factored into resettlement planning and implementation. document, other than an exempt document.	For compulsory land acquisition, the Minister of Lands, Housing and Urban Development must declare the location, approximate area and plan of the land required. All land owners and occupiers must receive a copy of this declaration and must be informed on when and where they can inspect the plan of the land. A licensee is not permitted to exercise any right upon land without prior written consent from the land owner. Disclosure and consultation are also required as soon as the need for resettlement has been identified.	Despite references to consultation and disclosure, community participation does not drive the land acquisition and resettlement process.  According to the Petroleum (Exploration, Development and Production) Act, accounting for the “interests of the community” is done after having obtained consent from affected persons. There is no mention of how host communities or women shall be engaged during	The project is committed to informing Project Affected Persons and having them participate throughout the data collection as witnesses to the entire exercise. Furthermore, there has been timely disclosure of information regarding the survey and valuation of affected properties within affected communities.  The project has further ensured that women are fully involved in the land acquisition processes. The reporting is gender sensitive.  Furthermore, the District, Subcounty and Local Councils have been fully

Resettlement Topic	IFC Performance Standard	Ugandan Legal & Policy Framework	Gap	Mitigation measures
			resettlement activities.	involved in the land acquisition process.
Eligibility	<p>Eligibility criteria should recognize the rights of those affected people:</p> <ul style="list-style-type: none"> <li>• Who have formal legal rights to the land or assets they occupy or use;</li> <li>• Who do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under national law, and;</li> <li>• Who have no recognisable legal right or claim to the land or assets they occupy or use. The census will establish the status of the displaced persons.</li> </ul>	<p>Ugandan laws recognize land occupancy under four regimes of land tenure, namely freehold, leasehold, <i>mailo</i> and customary. Under these different types of land ownership, occupants, users and land owners are eligible for compensation for land, improvements to land, crops and structures.</p>	<p>Uganda laws and IFC PS 5 are consistent in the recognition of the rights of occupants and land owners under the different land tenure regimes.</p>	<p>The Project has recognised the rights of all affected people including those with formal legal rights; those without formal legal rights and those who have no recognisable legal right to land or assets used or occupied by them. The census undertaken prior to land acquisition and resettlement activities helped to establish the status of the PAPs.</p>
Cut - off Date	<p>In the absence of Government procedures, the client will establish a cutoff date for eligibility which will be well documented and disseminated throughout the project area.</p>	<p>There is no legal provision for the establishment of a cut-off date, but the Guidelines for Compensation Assessment under Land Acquisition (GCALA, MLHUD</p>	<p>The Uganda Laws and Regulations are unclear on how the cut- off date is to be enforced.</p>	<p>Cut-off dates for eligibility were established as a rolling cut - off date for the individual PAPs on the date of assessment and a General Cut-off Date was established at the end of the entire census in a</p>

Resettlement Topic	IFC Performance Standard	Ugandan Legal & Policy Framework	Gap	Mitigation measures
		<p>2017) and the EIA Guidelines for the Energy Sector (2004) make reference to the cut-off date for the determination of eligibility but does not provide any procedural guidance.</p> <p>With regard to compulsory land acquisition the intention to acquire land must be published in several notices; exhibited at “convenient places on or near the land” and should state who should be compensated.</p>		<p>District/at a PA site. This was documented and disseminated to the PAPs, including relevant ministries and local authorities.</p>
Census	<p>Where involuntary resettlement is unavoidable, a census will be carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance.</p>	<p>Uganda laws do not require that a census be taken of the persons who will be displaced by the project. However, the 2004 EIA Guidelines for the Energy Sector refer to the census as the means to identify all affected persons and their means of livelihood. It also refers to a baseline study to identify all interests in affected assets, including the rights of tenants.</p>	<p>The Guidelines require that a census be conducted in the event of compensation and resettlement.</p>	<p>The Project is committed to identifying all persons who will be affected. This has been done in the form of a census by the cadastral and valuation team as well as the socio-economic, cultural and archaeological teams, prior to resettlement to determine who is eligible for compensation and assistance.</p>

Resettlement Topic	IFC Performance Standard	Ugandan Legal & Policy Framework	Gap	Mitigation measures
Economic Displacement (loss of land)	Economically displaced persons will be compensated for the loss of economic assets at full replacement cost (PS5, §27) and with replacement land of at least the same productive potential and location advantage (PS5, §28).	Displacement resulting from development project activities is not defined in Uganda laws. The EIA Guidelines for the Energy Sector consider compensation for the loss of land. The type of compensation packages that should be awarded to project affected persons is not described.	The Uganda laws do not categorize project affected persons according to the impact that proposed land acquisition and resettlement activities have on them. There is no specific requirement to provide replacement land to project affected persons, but it is an option available for consideration.	The project is committed to compensating economically displaced persons: <ul style="list-style-type: none"> <li>• with monetary or in-kind compensation. be timed not to be during the planting season</li> <li>• For the loss of economic assets at replacement cost.</li> </ul>
Economic Displacement (Business loss)	Economically displaced persons will also be provided with <ul style="list-style-type: none"> <li>• assistance to re-establish commercial activities (businesses),</li> <li>• replacement property of equal or greater value and will be provided with transitional support as necessary to restore their income-earning capacity and standards of living (PS5, §29).</li> </ul>	Unlike economically displaced persons who own land, commercially displaced persons only have legal claims to land by virtue of occupancy. The Uganda laws recognize this ownership as a formal land right and such occupants must be considered under Section 139, Subsection 1(b) of the Petroleum (Exploration, Development and Production) Act which provides that “account shall be taken of any	The local laws are inconsistent with what is stipulated in the IFC guidelines when it comes to assistance in the reestablishment of commercial activities and provision of replacement property with transitional support as necessary to restore the affected	The Project is committed to support commercially displaced persons who may be identified, and these will receive: <ul style="list-style-type: none"> <li>• assistance to re-establish commercial activities;</li> <li>• replacement property of equal value, and;</li> </ul>

Resettlement Topic	IFC Performance Standard	Ugandan Legal & Policy Framework	Gap	Mitigation measures
		improvements effected the benefit of which has or will accrue to the land owner”.	person’s income earning capacity.	<ul style="list-style-type: none"> <li>• restore their income earning capacity and standards of living.</li> </ul>
Replacement Cost	<p>Mitigation measures for the adverse impacts should include compensation at full replacement cost for loss of assets and other assistance to help them improve or restore their standards of living and livelihoods.</p> <p>Where livelihoods of displaced persons are land based, or where land is collectively owned, affected persons will be offered land-based compensation where feasible.</p> <p>Land will be taken into possession only after compensation has been made available and resettlement sites and moving allowances have been provided to affected persons (PS5, §2, 9).</p>	<p>The District Land Boards assess compensation based on open market value of the unimproved land; and buildings on the land are compensated at open market value (in urban areas) and depreciated replacement cost for the rural areas. Standing crops which can be harvested during the period of notice shall not be compensated. The list of rates of compensation compiled by the district land boards are to be used in determining the rates of compensation.</p> <p>The EIA Guidelines for the Energy Sector refer to “acceptable compensation rates” which are to be established after consultation with representatives of the affected communities.</p>	<p>Computation of compensation as outlined in the Land Act caters for the replacement costs characteristics in the market value.</p> <p>In addition to this, there is a statutory disturbance allowance paid on top of the compensation award assessed.</p>	<p>The compilation of the compensation rates compiled by the District Land Board and approved by the CGV, have taken into account the replacement cost of the crops, trees and structures. In addition to this, the PAPs are being allowed to take and make use of any salvageable materials.</p> <p>The DLB represents the community in this process.</p> <p>The Project has committed to mitigating the adverse impacts associated with land acquisition and resettlement by compensating affected persons at replacement cost (to achieve fair and</p>

Resettlement Topic	IFC Performance Standard	Ugandan Legal & Policy Framework	Gap	Mitigation measures
				adequate compensation) of the affected assets.
Form of Compensation	Compensation in-kind should be considered in preference over cash.	Article 26 of the 1995 Constitution of Uganda protects Ugandans from deprivation of property. Land can only be accessed once “prompt payment of fair and adequate compensation prior to the taking of possession of the property” has been undertaken.	The project is not required by Uganda laws to consider compensation in-kind although the EIA Guidelines for the Energy Sector refer to the “constraints to monetary compensation”.	The Project committed to compensating affected persons for loss of rights over land or property in-kind in preference over monetary compensation, where appropriate/ possible, but recognizing the PAPs’ rights to determine the compensating scenarios after full disclosure of available options.
Grievances	Affected persons will have access to an independent grievance mechanism to lodge concerns and complaints about compensation and relocation without impeding access to any judicial or administrative remedies (PS5, §11).	Disputes regarding compensation will be determined by Government (in practice the Chief Government Valuer). In addition, any person who has an interest or right over property being acquired compulsorily has a right of access to a court of law.	Uganda laws do not explicitly require that development project implementers develop independent grievance redress mechanisms that are accessible to affected communities and individuals. However, the EIA Guidelines for the Energy Sector makes provision for a grievance committee	The Project is committed and has constituted an independent grievance mechanism that is acceptable to PAPs. This has been achieved through the development of a clear and transparent grievance management mechanism. This is in addition to the legally stated grievance address mechanisms stipulated in the laws of Uganda.

Resettlement Topic	IFC Performance Standard	Ugandan Legal & Policy Framework	Gap	Mitigation measures
			“at the lowest level of activity” and the GCALA refers to a Grievance Mechanism.	

Source: EACOP Uganda RAP Report Chapter 3, Table 3-9

### 3.4 Rating of Compliance Level

The rating of compliance level against the applicable audit compliance requirements of IFC Performance Standards, Uganda legal requirements, and the EACOP RAP commitments has been undertaken in the four (4) categories of: Compliant, Partially Compliant, Non-Compliant, and No rating possible yet (see Table 6). The level of compliance is based on outcomes from document review, survey, site visits, observations, interviews, and FGDs.

Table 6: Compliance Level Categorisation & Definition

<b>Compliance Level</b>	<b>Definition</b>
Compliant	The audit compliance requirement is met.
Partially Compliant	Some aspects of the audit compliance requirement are met, while others are not; however, ongoing activities are still being implemented. Such audit areas will be followed up during the livelihood restoration monitoring and reviews, or the Ex-post RAP Implementation audit.
Non-Compliant	The audit compliance requirement is not met.
No rating possible yet	Lack of up-to-date information, too early in the implementation process, or not yet able to verify the implementation progress to rate the audit

## 4. Audit Approach and Methodology

The RAP Implementation Audit was carried out using participatory methods to guarantee the involvement and participation of PAPs and other pertinent stakeholders. The audit also utilized various data collection techniques, including Documents Review, PAH Surveys, Key Informant Interviews, FGDs, Site Visits, and Observations of RAP/LRP program outputs. These methods are described in detail in the following sections 4.1 - 4.5.

### 4.1 Documents Review

The primary sources of information for the RAP Implementation Audit were the various documents and records prepared by EACOP. Reviewing the documents and records ensured that the conclusions drawn had sufficient evidence, accuracy, and transparency during the audit process. Some of the documents and records made available and reviewed by GMT are detailed in Table 7 below.

Table 7: List of the main Reviewed Documents

#	Document Reference
1.	EACOP Uganda Resettlement Action Plan (RAP) Report dated March 2021
2.	EACOP Approved Main Valuation Reports, Approved Supplementary Valuation Reports, and Approved Addendum Valuation Reports, prepared by Newplan/ICS.
3.	EACOP Uganda Livelihood Restoration and Improvement Plan dated 13 April 2023
4.	EACOP Project Uganda Environmental and Social Impact Assessment Report (ESIA) Report dated February 2020
5.	Independent Biodiversity and Livelihoods Advisory Committee (IBLAC) for Oil and Gas Developments in Albertine Graben (Blocks: Contract Area 1, License Area 2, Kingfisher Development Area) (Uganda) and East African Crude Oil Pipeline (EACOP) from Kabaale in Hoima District (Uganda) to Tanga (Tanzania) Annual Report, 2023
6.	Independent Biodiversity and Livelihoods Advisory Committee (IBLAC) for Oil and Gas Developments in Albertine Graben (Blocks: Contract Area 1, License Area 2, Kingfisher Development Area) (Uganda) and East African Crude Oil Pipeline (EACOP) from Kabaale in Hoima District (Uganda) to Tanga (Tanzania) Annual Report, 2022
7.	EACOP Uganda Stakeholder Mapping Register, 2022
8.	EACOP Uganda RAP Stakeholder Meeting Records
9.	EACOP Uganda List of Physically Displaced PAPs Recipients of Replacement Land
10.	EACOP Uganda Grievance Management Procedure dated September 2022
11.	EACOP Uganda RAP Grievance Register dated June 2024

#	Document Reference
12.	EACOP Uganda Grave Relocation Procedure dated February 2023
13.	East African Crude Oil Pipeline (EACOP) Project Lenders Environmental and Social Consultant – Final Draft Environmental and Social Due Diligence Report dated January 2024 by WSP Italia S.r.l
14.	EACOP RAP Implementation Status Update as of 28 October 2024
15.	Total Energies On the Road Reassured in Uganda by Barclays dated 20 March 2023
16.	Cut-off and forgotten? Livelihood disruption, social impacts and food insecurity arising from the East African Crude Oil Pipeline by Tom Ogwang and Frank Vanclay dated 13 February 2021
17.	Advisory Review of the resubmitted Environmental and Social Impact Assessment for the East Africa Crude Oil Pipeline (EACOP) – Uganda by The Netherlands Commission for Environmental Assessment dated 22 October 2020
18.	EACOP Uganda RAP Implementation Activities Status as of 28 October 2024

## 4.2 Key Informants Interviews

The stakeholders and participants in the EACOP RAP were critical sources of information for this RAP Implementation Audit. They were identified and engaged through Key Informant Interviews (KIIs) to provide insights into the various aspects of the RAP. The key informants were purposively sampled, with a special focus on resource persons from the following categories: PAPs/PAHs, local community leaders, district stakeholders, Civil Society Organisations (CSOs), relevant national-level stakeholders, EACOP, EACOP Contractors, EACOP Lenders, Environmental & Social Consultants, and Independent EACOP Advisors. The interviews were semi-structured to verify the results from the documentary and the field visits' sources. Depending on the aspect under discussion, the identified list of stakeholders interviewed is provided in Table 8 below.

Table 8: List of KIIs groups during the RAP Implementation Audit

#	Stakeholders	Topics/Issues Discussed
1.	PAPs/PAHs	<ul style="list-style-type: none"> <li>• Stakeholder engagement and disclosure</li> <li>• Livelihood restoration</li> <li>• Standards of living</li> <li>• Entitlement; compensation delivery</li> <li>• Replacement housing and Tenure Security</li> <li>• Grievance management</li> <li>• Perception of the land acquisition process</li> </ul>

#	Stakeholders	Topics/Issues Discussed
		<ul style="list-style-type: none"> <li>• Social systems and social networks</li> <li>• Vulnerable persons support systems/ caretakers</li> <li>• Available opportunities within the community</li> </ul>
2.	Community Leaders (Men and Women)	<ul style="list-style-type: none"> <li>• Same as above</li> </ul>
3.	District Consultative Committees (DCCs) for all affected 10 districts	<ul style="list-style-type: none"> <li>• Stakeholder Participation, Compensation, Replacement Housing, Grievances, recurrent grievances, and livelihood restoration</li> </ul>
4.	Civil Society Coalition on Oil and Gas (CSCO)	<ul style="list-style-type: none"> <li>• Stakeholder participation and disclosure</li> <li>• Compensation Determination</li> <li>• Compensation Payment</li> <li>• Livelihood Restoration and Improvement (its effectiveness)</li> <li>• Vulnerable Persons Assistance</li> <li>• Replacement Housing and Tenure Security</li> <li>• Grievance Management</li> <li>• Issuance of Notices to Vacate</li> <li>• General and crossing cutting land acquisition issues</li> </ul>
5.	EACOP	<ul style="list-style-type: none"> <li>• Stakeholder participation and disclosure</li> <li>• Compensation Determination</li> <li>• Compensation Payment</li> <li>• Livelihood Restoration and Improvement (its effectiveness)</li> <li>• Vulnerable Persons Assistance</li> <li>• Replacement Land Acquisition</li> <li>• Replacement Housing and Tenure Security</li> <li>• In-kind replacement of communal water sources</li> <li>• Management of Cultural Heritage</li> <li>• Grievance Management</li> <li>• Issuance of Notices to Vacate</li> </ul>

#	Stakeholders	Topics/Issues Discussed
		<ul style="list-style-type: none"> <li>• Project Land Titling and Transfer</li> <li>• General and crossing cutting land acquisition issues</li> </ul>
6.	Psychosocial Support Contractor	<ul style="list-style-type: none"> <li>• Psychosocial Support for PAPs with graves</li> <li>• Management of Cultural Heritage especially graves</li> </ul>
7.	Livelihood Restoration Coordinators (LRCs)	<ul style="list-style-type: none"> <li>• Livelihood Restoration and Improvement</li> <li>• Livelihood Restoration Indicators</li> </ul>
8.	Livelihood Implementing Partners (LIPs)	<ul style="list-style-type: none"> <li>• Livelihood Restoration and Improvement</li> </ul>
9.	Chief Government Valuer	<ul style="list-style-type: none"> <li>• Compensation Determination</li> <li>• Compensation Rates</li> <li>• Grievance Management</li> <li>• Replacement Housing and Tenure Security</li> </ul>
10.	Ministry of Energy and Mineral Development	<ul style="list-style-type: none"> <li>• Stakeholder Engagement</li> <li>• Compensation Determination</li> <li>• Compensation Payment</li> <li>• Vulnerable Persons Assistance</li> <li>• Replacement Housing and Tenure Security</li> <li>• Grievance Management</li> <li>• Issuance of Notices to Vacate</li> </ul>
11.	Petroleum Authority of Uganda (PAU)	<ul style="list-style-type: none"> <li>• Stakeholder participation and disclosure</li> <li>• Compensation Determination</li> <li>• Compensation Payment</li> <li>• Livelihood Restoration and Improvement</li> <li>• Vulnerable Persons Assistance</li> <li>• Replacement Housing and Tenure Security</li> <li>• Grievance Management</li> <li>• Issuance of Notices to Vacate</li> </ul>

#	Stakeholders	Topics/Issues Discussed
		<ul style="list-style-type: none"> <li>• General and crossing cutting land acquisition issues</li> </ul>
12.	WSP Italia S.r.l - Lenders Environmental and Social Consultant (LESC)	<ul style="list-style-type: none"> <li>• Compensation Determination</li> <li>• Livelihood Restoration and Improvement</li> <li>• IFC Performance Standards Compliance</li> <li>• Lessons Learnt</li> </ul>
13.	Independent Biodiversity and Livelihoods Advisory Committee (IBLAC)	<ul style="list-style-type: none"> <li>• Livelihood Restoration and Improvement</li> <li>• Biodiversity and Livelihoods</li> <li>• IFC Performance Standards Compliance</li> <li>• Lessons Learnt</li> </ul>

### 4.3 Focus Group Discussions

One way of collecting qualitative data was through FGDs. These were conducted with the following categories:

- PAPs/PAHs, including men, women, and youths were consulted through the FGDs to understand their levels of participation in stakeholder engagements, compensation determination, satisfaction with grievance mechanism, changes in their way of life, challenges, barriers to support, and benefits from livelihood programs. Their satisfaction with land acquisition processes and access to service centers (e.g. schools, health, water sources) near replacement housing was also assessed. Engaging with the PAPs enabled us to establish their level of satisfaction with restoration programs.
- Vulnerable PAPs – Category 1 & Category 2 vulnerable-headed households e.g. chronically ill and disabled persons, women, persons below 18 years; 65 years and above. GMT conducted FGDs with these categories to gain an understanding of their level of participation in stakeholder engagements, their livelihoods, way of life, and challenges. This FGD also discussed the outcomes and barriers of vulnerable persons' support and livelihood programs, grievances, and their uptake of the grievance management, compensation, land acquisition, access to services (e.g. schools, health, water sources), and social networks near replacement housing.
- Women PAPs: Category 3 household members' 'at risk' (e.g. married women).

### 4.4 Site Visits and Observations

GMT conducted site visits as part of the audit to verify the results of RAP Implementation (monetary compensation, replacement housing and land, standards of living and livelihoods, graves relocation, livelihood restoration program sites, and priority areas). This was done to ascertain and verify the levels of compliance to the standards and regulations set up in the RAP (e.g. replacement houses and access to social services, way-of-life of PAHs/PAPs and how they are adapting to the livelihood restoration initiatives extended to them). Visits were also made to a sample of ongoing and closed grievances to understand PAPs' experience of the Project grievance mechanism. As a means of observation, photographs were taken to provide the necessary evidence.

The Audit Team conducted site visits to observe the following:

- Stakeholder engagement mechanism
- Grievance management mechanisms
- In-kind replacement of houses, communal water sources, and land acquisition processes
- Availability of social services (water, health, schools, access roads) in reference to replacement houses
- Standards of living
- Livelihood sources such as gardens
- Vulnerable persons support
- Graves relocation sites.

The focus was on the physically and economically displaced PAH, with a particular focus on:

- Replacement House recipients
- Vulnerable PAHs
- Livelihood sources including gardens and demonstration sites
- Community water sources
- Taala Central Forest Reserve Physically Displaced Project Affected Persons (PD PAPs)
- Grievance cases.

#### **4.5 PAH Survey**

The GMT team conducted a PAH Survey to verify the results from other data sources. The approved PAH Survey questionnaire was used to gather information on the following:

- Current and former PAP's location
- Stakeholder participation in RAP activities
- Current status of compensation and its utilization
- Any outstanding issues related to compensation
- Level of satisfaction regarding the implementation of the RAP
- Engagement and awareness of the interventions
- Eligibility criteria for LRP
- Satisfaction with grievance management
- Ongoing support provided to improve livelihoods

- Whether their livelihood status had been restored or improved.

The quantitative results were complemented with qualitative interviews to understand the reasons behind any changes during the RAP Implementation. The focus was on collecting primary data from vulnerable households/groups that had been beneficiaries of the restoration activities throughout the livelihood restoration process. The survey targeted the PAH head and/or spouse.

The surveys were administered by trained data collection officers with skills and expertise in data collection at the community level. The local leadership and the EACOP CLOs assisted the survey teams in gaining access to the sampled households. Electronic data collection using Kobo collect was employed to ensure easy, quality, and fast data collection. The collected data was sent wirelessly to a secure server. At the end of each day of data collection, the team reviewed the data captured daily and investigated anomalies before the next day's activities.

#### 4.5.1 Sampling Frame

Based on the approved RAP Report, Approved Main Valuation Reports, Approved Supplementary Valuation Reports, and Approved Addendum Valuation Reports availed to us, **3,660** PAPs are eligible for compensation. These comprise **3,588 PAHs<sup>20</sup>** and **72 Project Affected Institutions (PAIs)**.

The survey sampling frame for the RAP implementation audit only PAHs. A census was conducted for households in the Priority Areas with all PAHs participating in the audit exercise. For households affected by the Pipeline Right of Way (PPL RoW), sampling was conducted from all eligible PAHs categorized as follows:

- CATEGORY A: Land Ownership Status
- CATEGORY B: Physically Displaced
- CATEGORY C: Economically Displaced
- CATEGORY D: Impacted Land Size
- CATEGORY E: Female Headed Households
- CATEGORY F: PAPs with affected Graves
- CATEGORY G: Vulnerable PAPs

#### 4.5.2 Sample Size Determination

The following statistical formula developed by Slovin, E (1960) was used to calculate the sample from the targeted population of PAHs. This was adopted because the assessment adopted a purposive and stratified sampling strategy.

$$n = N / (1 + Ne^2)$$

where n = sample size

N= Eligible population = 3,588

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<sup>20</sup> Individuals who are part of families affected by the Project's development are collectively referred to as Project Affected Households (PAHs), which includes members of a household, whether related or not, operating as a single socio-economic and decision-making unit, who are affected by the Project. In other words, as per UBOS, a household is defined as a person or group of persons who normally cook, eat and live together irrespective of whether they are related or unrelated.

e = Margin of error = 1% or 0.01

With a margin of error of 1%, applying the above Slovin's formula provides the survey with 515 sampled PAHs. In addition, 142 households from priority areas were added to the sample, bringing the total to 657 households targeted in the RAP implementation audit PAH survey as detailed in Table 9 below.

#### 4.5.3 Sampling Procedure

The sampling took a purposive and stratified multi-stage sampling process:

- The 10 districts traversed by the EACOP Project are already determined as these are the districts within which EACOP Uganda RAP is being implemented. At this point, the number of PAHs participating in each district was determined based on the proportion to the size of the PAH population shown in Table 9 below
- The second stage was sampling the PAHs under different categorizations, including land ownership status, physical displacement, economically displaced, impacted land size (which affects the size of the compensation package), gender of household head (focusing on female-headed households), PAs with relocated graves, and vulnerable PAs (Category 1 vulnerability) per district. The sampling was also proportionate to the total number of PAHs by district, and only the categories of PAHs existing in a particular district were sampled. Table 9 below shows the number of PAHs per category and district
- All the villages where the PAs are located participated in the RAP implementation audit activities. For PAHs along the PPL RoW, GMT did purposive sampling of the PAHs per category to generate the list of PAH samples
- The data collection officers with the assistance from local village leader(s) moved and traced PAHs from the drawn list of PAHs for audit surveys. Where after confirmation that the drawn PAH on the PPL RoW was unavailable, a close replacement in the same category was made.

Table 9: RAP Implementation Audit PAH Survey

EACOP component	District	No. of PAHs	Audit Sampled PAHs							Total Surveys
			Land ownership	Physically Displaced	Economically Displaced	Impacted land size	Female Headed Households	With relocated graves	Vulnerables	
MCPY-1	Kakumiro	32								32
MCPY-2 and access road	Mubende	15								15
MCPY-3	Sembabule	46								46
PS-2, helipad, and access road	Sembabule	10								10
MCPY-4 and access road	Kyotera	39								39
<b>Total for PAs</b>		<b>142</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>142</b>
PPL ROW	Hoima	82	2	1	2	3	2	2	2	14
PPL ROW	Kikuube	391	11	5	11	18	5	5	7	62
PPL ROW	Kakumiro	320	8	1	9	17	5	5	6	51
PPL ROW	Kyankwanzi	210	4	2	6	9	3	3	3	30
PPL ROW	Mubende	639	16	7	18	2	11	11	15	80
PPL ROW	Gomba	41	1	0	1	0	1	1	1	5
PPL ROW	Sembabule	400	9	2	12	2	6	7	8	46
PPL ROW	Lwengo	525	12	2	16	16	10	13	12	81

EACOP component	District	No. of PAHs	Audit Sampled PAHs							
			Land ownership	Physically Displaced	Economically Displaced	Impacted land size	Female Headed Households	With relocated graves	Vulnerables	Total Surveys
PPL ROW	Rakai	341	9	1	10	12	7	11	7	57
PPL ROW	Kyotera	497	12	1	15	19	11	20	11	89
<b>Total for PPL ROW</b>		<b>3,446</b>	<b>84</b>	<b>22</b>	<b>100</b>	<b>98</b>	<b>61</b>	<b>78</b>	<b>72</b>	<b>515</b>
<b>Total for EACOP Uganda</b>		<b>3,588</b>	<b>84</b>	<b>22</b>	<b>100</b>	<b>98</b>	<b>61</b>	<b>78</b>	<b>72</b>	<b>657<sup>21</sup></b>

A total of **638 PAH** Surveys were completed, comprising **515 PPL RoW PAHs** and **123 PAs PAHs**, which represent 97.11% of the target sample of 657, with 35.11% being female-headed households across the PAH categories as shown in Table 10 below.

Table 10: Overall Gender Distribution of the Surveyed PAH for RAP Implementation Audit

EACOP Component	District	Female		Male		Total
		n	%	n	%	N
MCPY-1	Kakumiro	9	43	12	57	21
MCPY-2 and access road	Mubende	6	40	9	60	15
MCPY-3	Sembabule	14	33	28	67	42
PS-2, helipad, and access road	Sembabule	1	10	9	90	10
MCPY-4 and access road	Kyotera	5	14	30	86	35
<b>Total for PAs</b>		<b>35</b>	<b>28</b>	<b>88</b>	<b>72</b>	<b>123</b>
PPL ROW	Hoima	6	43	8	57	14
PPL ROW	Kikuube	15	24	47	76	62
PPL ROW	Kakumiro	16	31	35	69	51
PPL ROW	Kyankwanzi	7	23	23	77	30
PPL ROW	Mubende	31	39	49	61	80
PPL ROW	Gomba	2	40	3	60	5
PPL ROW	Sembabule	17	37	29	63	46
PPL ROW	Lwengo	36	44	45	56	81
PPL ROW	Rakai	21	37	36	63	57
PPL ROW	Kyotera	37	42	52	58	89
<b>Total for PPL ROW</b>		<b>188</b>	<b>37</b>	<b>327</b>	<b>63</b>	<b>515</b>
<b>Total for EACOP Uganda</b>		<b>223</b>	<b>35</b>	<b>415</b>	<b>65</b>	<b>638</b>

Source: GMT RAP Implementation Audit PAH Survey, 2024 (n=638)

The remaining 19 PAs PAH surveys were not realized because these PAHs were either unavailable, unknown, or absentees.

#### 4.6 Data Processing, Analysis, and Reporting

Data analysis involved the application of both qualitative and quantitative approaches and tools. For qualitative data (gathered through FGDs, KIIs, document review, observations, and site visits), narrative and thematic analyses were employed. Narrative analysis was preferred because it was ideal for bringing together accounts of events, experiences, and perceptions of the participants in the Audit (including PAPs, local leaders, and RAP implementing parties) about their participation and mandate in RAP activities. Thematic

<sup>21</sup> Please note that these 657 PAHs fall in multiple categories defined in section 4.5.1

analysis was employed, as it is suitable for reducing the data into meaningful themes/groups, facilitating better articulation and easier management.

Quantitative data collected from PAPs through a survey questionnaire were analyzed using SPSS and then transferred to MS Excel. In Excel, PivotTables were preferred for their flexibility and ease of use in sorting and filtering information to generate and display numerical data for analytical insights. The tool transformed data from PAHs into simple tables and graphs for easier interpretation and communication of the Audit findings.

The qualitative narratives were backed by the numerical data to articulate the Audit findings, translating into clarity in reporting and dissemination of information.

## 5. Audit Findings

### 5.1 Stakeholder Participation and Disclosure

#### Compliance Requirements

IFC PS1 establishes the importance of effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them. IFC PS5 para 9 requires engagement with affected communities, including host communities, through the process of stakeholder engagements described in PS 1. For example, decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. IFC PS 1 further recognizes that stakeholder engagement is an ongoing process throughout the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement. Section 5 of the Uganda Land Acquisition Act 1965 (Cap. 226) requires notifications to affected or interested persons with such information such as particulars of land, available avenues of engagement with all persons having interest in the land among others.

#### Key observations and findings

Disclosure of information, consultation, and informed consultation and participation are key requirements assessed by the audit under the stakeholder participation and disclosure audit area.

The audit has established an overall positive finding in the implementation of stakeholder engagements during the EACOP Uganda RAP Preparation and Implementation phase. The RAP Report provides details on stakeholder engagement undertaken during the RAP planning phase, as well as those planned for the RAP implementation phase. A kick-off workshop for the land acquisition and resettlement program was organized by TEAM B.V. in collaboration with national-level agencies prior to the surveys. Participants included leading government agencies such as PAU, MEMD, UNOC, and MLHUD. There were workshops held for both the PAs and PPL RoW components of the Project. Sensitization meetings were conducted for district, sub-county, and village stakeholders. At the village level, community members and local leaders were sensitized. A total of 48,700 persons (17,807 women) attended meetings as shown in Table 11 below. Sensitization of community members was undertaken transparently, and meetings were held in areas widely accessible within the 171 villages. Topics covered during the community sensitization included: overview of the Project; RAP activities; Stakeholder Engagement; Socio-economic Survey; Boundary Opening Exercise; Cadastral Survey; Valuation of Assets; Cut-off Dates; Eligibility for Compensation; Grievance Mechanism; and Resettlement Committees. Question-and-answer sessions were conducted to enable participants to ask questions or seek clarification. Engagements were undertaken in the language(s) relevant to the local area, with RAP Team Members available to provide translation if necessary. The languages included Runyoro, Runyankore, Rukiga, Luganda, and English, with translations of materials such as cut-off dates and cultivation of seasonal crops notices posted in accessible public places in the affected villages, sub-county offices, and district office Notice Boards.

Table 11: Summary of Participation in Stakeholder Engagements during RAP Preparation Phase

Activity	# of meetings	Male	Female	Total
District and Community Stakeholder Engagements	Across 10 Districts	20,714	10,329	31,043
Stakeholder Engagement during Livelihood Engagements	Across 10 Districts	471	238	709
Stakeholder Engagement during Daily Interactions (Daily Logs)	Multiple across Districts	133	50	183

Activity	# of meetings	Male	Female	Total
Stakeholder Engagement during Signing of Valuation Form	Across 10 Districts	1,197	2,790	3,987
Stakeholder Engagement during Signing of Survey Forms	Across 10 Districts	1,073	2,505	3,578
Stakeholder Engagement during Signing of Socio- Economic Forms	Across 10 Districts	3,244	1,261	4,505
Stakeholder Engagement during NFA Engagements	Across 10 Districts	-	-	1,106
Stakeholder Engagement during NGOs/CBO Engagements	Multiple across Districts	121	49	170
Stakeholder Engagement during Return of Survey Forms	Multiple across Districts	-	-	438
Priority Areas Engagements	Multiple across Priority Areas	621	383	1,004
Stakeholder engagements at JV Offices	Multiple meetings	220	70	290
Engagement during Grievance Handling	Multiple across all Project areas	112	32	144
Engagement during Legal Disputes	Multiple local engagements	49	28	77
Stakeholder Engagement during Boundary Rectification	Multiple engagements	-	-	280
Engagement during Signing of Assessment of Housing	Multiple engagements	-	-	186
Engagement during Cultural Heritage Assessments	Multiple engagements	102	43	145
Engagement during Archaeology Assessments	Multiple engagements	233	21	254
Engagement during Wetlands and River Assessments	Multiple engagements	-	-	589
Engagement for Members of Parliament and Kingdoms	Multiple engagements	10	2	12
<b>Total<sup>22</sup></b>		<b>28,300</b>	<b>17,801</b>	<b>48,700</b>

Source: EACOP Uganda RAP Report (March 2021)

During the RAP Implementation phase, stakeholder engagement was undertaken on topics including RAP, Compensation Packages, Replacement Housing (including their design, delivery, and handover to eligible physically displaced households), Livelihood Restoration (LR) packages, the continued use of land by PAPs until relocation, and Grievance Management. On LR activities, PAHs level engagements were conducted on eligibility criteria and LR package contents, culminating in the signing of LR consent forms. Indeed, from the audit KIIs with DCCs and Community Local Leaders, it was pointed out that PAPs were provided with multiple avenues to engage and access information. However, through some of the FGDs with PAPs, it was noted that there were some gaps in the sensitization towards PAPs on eligibility criteria of LR packages, including transitional assistance programs of food baskets, frequency of distribution of agricultural starter packs, and plans for compensation of Unviable Residual Land (URL) much as EACOP advised PAPs about the URL through Entitlement Briefings and Compensation Agreements (EB/CA). It was observed that more efforts were made towards sensitizing neighbors, the wider community members, and non-PAP farm workers on the availability of free and open access to LR agricultural training sessions under the Food Security—establishing/enhancing vegetable gardens, Crop Productivity Enhancement and Diversification, and Livestock Rearing Productivity Enhancement LR packages. EACOP reported that approximately 400 non-PAPs have so far participated in these LR agricultural training.

<sup>22</sup> The male and female totals do not equal the combined total because some events in the table show total number of attendees without a gender split.

Stakeholder engagements with vulnerable persons were found to be adequate, as exemplified by the Project arranging transport for vulnerable persons, such as the disabled and elderly, to meeting venues and ensuring these venues are close to vulnerable PAPs and the elderly, and also visiting vulnerable PAPs in their houses to save them from traveling. For vulnerable persons with health complications, meetings were limited to a maximum of 45 minutes. This also allowed women and men to continue with their household activities after the meetings.

The audit PAH survey revealed that PAPs were overall provided with adequate information across all the Districts. Of the sampled PAHs (638), 98.6% (100% female-headed PAHs; 99.5% male-headed PAHs) revealed that they were informed about the RAP activities, and 99.5% reported that they were informed about their rights to continue cultivating their land with seasonal crops after the Project cut-off date was declared in 2018 and 2019 for PAs and PPL RoW, respectively. Moreover, 98.4% of those informed about the RAP activities reported being informed about the available compensation assistance and were consulted during the RAP Preparation and Implementation phases. Among those informed about the RAP activities, 99.2% stated that they were adequately consulted during the RAP planning and implementation phases, including discussions on options such as in-kind compensation versus monetary compensation, and livelihood development design as summarized in Table 12 below.

Table 12: Proportion of PAHs indicating that they are sufficiently informed about RAP activities (n=638)

Information Disclosure	Proportion of PAPs who indicated that they were appropriately informed in a timely, understandable, accessible, and appropriate manner	Those PAHs who indicated being well-informed about their right to continue cultivating the land with seasonal crops until they are required to vacate it	Those explicitly informed of the available compensation assistance for PAPs (e.g., letters of administration and access to third-party legal advice)	Those sufficiently consulted during the RAP development and implementation process, including options and alternatives such as in-kind versus cash compensation, livelihood development design
Hoima (n=14)	92.9%	100.0%	100.0%	85.7%
Kikuube (n=62)	91.9%	98.4%	96.8%	95.2%
Kakumiro (n=72)	98.6%	100.0%	94.4%	100.0%
Kyankwanzi (n=30)	100.0%	100.0%	100.0%	100.0%
Mubende (n=95)	98.9%	100.0%	100.0%	100.0%
Gomba (n=5)	100.0%	100.0%	80.0%	100.0%
Ssembabule (n=98)	99.0%	100.0%	100.0%	100.0%
Lwengo (n=81)	100.0%	98.8%	98.8%	100.0%
Rakai (n=57)	100.0%	100.0%	98.2%	100.0%
Kyotera (n=124)	100.0%	99.2%	99.2%	100.0%
Total	98.6%	99.5%	98.4%	99.2%

Source: GMT RAP Implementation Audit PAH Survey, 2024 (n=638)

With regards to PAPs' satisfaction with RAP, LRP information, and consultations, the majority of sampled PAHs expressed high satisfaction with RAP preparation activities conducted to assess impacts and determine eligibility. Specifically, 82.1% were very satisfied, 15.2% were moderately satisfied, and only 2.7% were not satisfied, as illustrated in Figure 2 below. The main reasons for dissatisfaction were related to a lack of understanding of the eligibility criteria for food baskets and LR support packages, valuation, and being unable to attend the RAP planning activities. In terms of district-level satisfaction, Lwengo (91.0%), Rakai (89.5%), and Kyankwanzi (87.0%) had the highest percentages of PAHs who were very satisfied, while Gomba had all PAHs moderately satisfied. PAP's

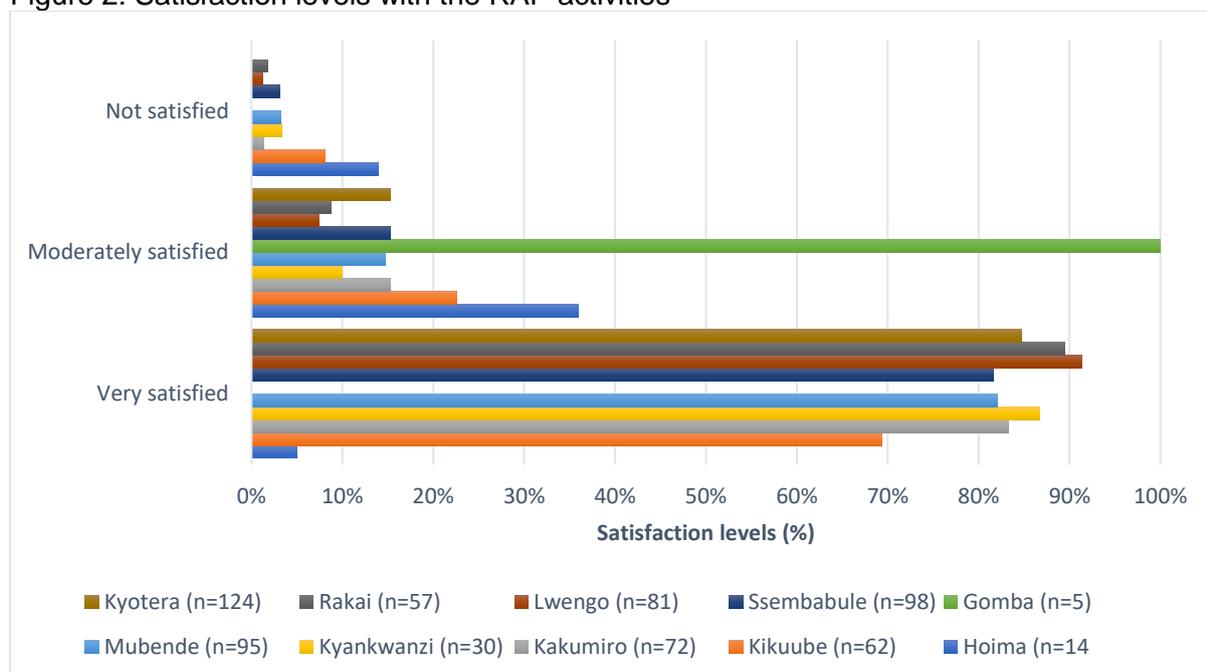
dissatisfaction is, however, contradicted by the evidence from the held LR package briefing meetings, where eligibility and entitlements were disclosed, consent forms signed by the PAPs, and certificates of translation made available to them. Overall, satisfaction levels indicate that RAP & LRP information disclosure and consultations were done to the expectations of the majority of PAPs.

PAPs also confirmed this high score in the level of information disclosure during KIIs, FGDs, and site visits/observations. They mentioned that they were also informed about the contents of the Transitional Support and LR packages, as well as the open access to the LR agricultural training to non-PAPs. EACOP reported that approximately 400 non-PAPs have so far participated in LR agricultural training.

The reasons given for satisfaction with the consultation included the translation into local languages, transportation of vulnerable PAPs to attend meetings, and consultations on resettlement location options and alternatives.

In the audit survey, 91.5% (584 of the sampled PAHs) reported no instances of undue pressure towards PAPs during the Entitlement Briefing and Compensation Agreement (EB/CA) signing. While not applicable to everyone, some of the remaining PAPs reported that they did not understand that the grievance mechanism did not affect their rights to seek legal redress in court.

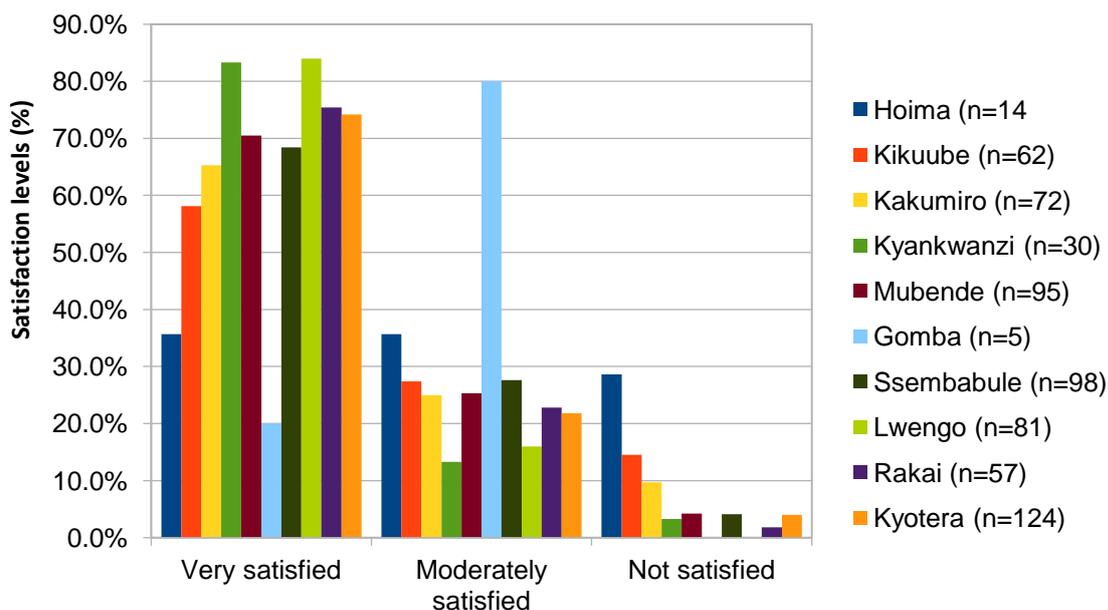
Figure 2: Satisfaction levels with the RAP activities



Source: GMT RAP Implementation Audit PAH Survey, 2024

The audit further analyzed the level of PAPs’ satisfaction with the incorporation of their views in the RAP activities. According to the survey, 70.7% of the sampled PAPs were very satisfied, 23.8% moderately satisfied, while 5.5% were unsatisfied. Based on the audit KIIs and FGDs, the main reason for satisfaction was that the preferred location for replacement housing was adopted; dissatisfaction was related to failure to pay attention to PAPs’ feedback regarding their preferred seasonal calendar for delivery of inputs, compounded by external factors such as drought, which negatively affected the results of the crop growing LR support program.

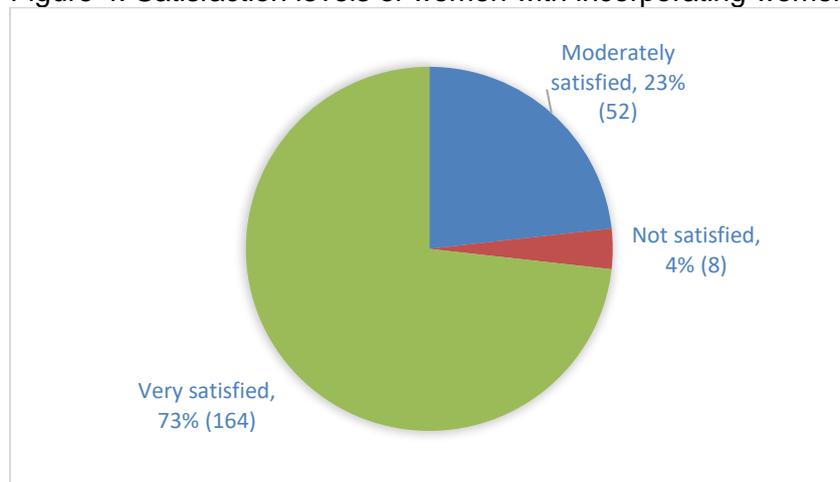
Figure 3: Satisfaction levels with the incorporation of PAPs' perspectives in the RAP



Source: GMT RAP Implementation Audit PAH Survey, 2024

An analysis of Women’s satisfaction with consideration of their views in the RAP and LRP activities revealed that 73.0% of the sampled female PAPs were very satisfied, while 23% were moderately satisfied.

Figure 4: Satisfaction levels of women with incorporating women's perspectives (n=224)



Source: GMT RAP Implementation Audit PAH Survey, 2024

**Corrective Actions**

None required

**Compliance Level**

Based on the above findings, the Project is:

- Compliant with the disclosure of Project information
- Compliant with consultations
- Compliant with informed consultation and participation

## Recommended Areas for Improvement

During the remaining LR implementation activities, incorporate the views of PAPs on input delivery schedules in line with the seasonal calendar/planting windows.

### 5.2 Compensation Determination

#### Compliance Requirements

The IFC PS5 para 9 requires where displacement cannot be avoided, displaced communities and persons should be offered compensation for loss of assets at full replacement cost<sup>23</sup> and other assistance to help them improve or restore their standards of living or livelihoods.

IFC PS5 further requires a full identification of displaced persons. According to para 17, displaced persons are in three categories:

- Those “who have formal legal rights to land or the assets they occupy or use”. These include persons holding land on customary, freehold, Mailo, and leasehold tenure in accordance with Article 237(3) of the Constitution of the Republic of Uganda and Sections 2 & 3 of the Land Act Cap 227 as amended.
- Those “who do not have formal legal rights to land or assets but have a claim to land which is recognised or recognisable under national law”. These include lawful and bonafide occupants<sup>24</sup> within the meaning of Section 29 of the Land Act Cap 227 as amended.
- Those “who have no recognisable legal right or claim to land or the assets they occupy or use”. These are licensees that include:
  - persons who have constructed buildings and or have cultivated crops on land owned by others, with or without approval and /or knowledge of the landowner. Such persons have no ownership interest in the land;
  - relatives who have been given rights to carry out agricultural production as well as building a homestead, but without necessarily having legal land rights. A typical example is children building next to their parents’ homestead and perhaps even sharing a compound. Again, these persons own structures and crops, but have no ownership interest in the land.
  - Squatters on protected land and reserves such as central forest reserves and wetlands. These persons own structures and or crops but have no ownership interest in the land;
  - Licensed users within protected land and reserves such as central forest reserves. These persons are eligible for compensation for their planted trees in the forest reserve.

Section 77 of the Land Act Cap 227, as amended provides the following valuation principles for compensation assessment determination:

- Land value is the open market value of unimproved land.

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<sup>23</sup> Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow affected communities and persons to replace lost assets with assets of similar value.

<sup>24</sup> Lawful and Bonafide Occupants are popularly known as Kibanja Landholders in Uganda.

- The value of buildings on the land is calculated at open market value for urban areas and replacement cost for rural areas.
- The value of standing crops and trees on the land, excluding annual crops, is determined in accordance with the district compensation rates as set by District Land Boards. Annual crops could be harvested during the period of notice given to the owner.
- In addition to the total sum assessed, if 6 months' notice to surrender possession is given, a disturbance allowance of 15% (of the total sum assessed) is paid; if less than 6 months' notice to surrender possession is given, a disturbance allowance of 30% (of the total sum assessed) is paid.

The Guidelines for Compensation Assessment Under Land Acquisition (GCALA), 2017, recommend that the compensation award should be reviewed annually at 15% if it has not been paid within one year from the project cut-off date.

### **Key observations and findings**

PAPs identification and eligibility, Identification and Inventory of Affected Assets, and Determination of compensation at full replacement cost<sup>25</sup> are the key compliance requirements assessed by the audit under the Compensation Determination audit area.

The audit established that the RAP preparation activities were conducted from 2018 to 2021. Based on the Approved Main Valuation Reports, Approved Supplementary Valuation Reports, and Approved Addendum Valuation, 3,660 PAPs were identified and are eligible for compensation. These comprise 3,588 Project Affected Households (PAHs)<sup>26</sup> and 72 Project Affected Institutions (PAIs).

The compensation awards were determined using the approved District Compensation Rates (DCRs) (in case of affected crops, trees, graves, shrines, & buildings of non-permanent nature), prevailing land/plot market rates, and replacement construction rates for buildings of permanent nature. The applied compensation rates were as of the cutoff dates declared in 2018 and 2019 for PAs PAPs and PPL RoW PAPs respectively.

Commercial negotiations as well as the outbreak of the COVID-19 pandemic and the eventual lockdowns delayed the preparation of the EACOP RAP Report including the Valuation Reports. The Valuation Reports were approved by the CGV in July 2020.

Based on complete years when surveys were completed, EACOP established an uplift compensation rate on top of the CGV approved statutory compensation (including the 30% disturbance allowance). The uplift rate of 15% per year was applied from the cutoff date to the date of Valuation Reports approval by the CGV. Hence, Priority Area (PA) PAPs were 3 years since 2018 and Pipeline (PPL) RoW were 2 years since 2019. As a result, PA PAPs received an uplift of 45% in addition to the CGV-approved statutory compensation, while PPL RoW received an uplift of 30% on top of the CGV-approved statutory compensation.

EACOP informed PAPs of the basis of compensation determination through RAP disclosure meetings, individual PAP disclosures, and EB/CA signing. The Third-Party Advisor also attended the EB/CA signing to explain and answer any questions from PAPs. In addition,

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<sup>25</sup> Replacement cost is defined as the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be taken into account. Market value is defined as the value required to allow affected communities and persons to replace lost assets with assets of similar value.

<sup>26</sup> Individuals who are part of families affected by the Project's development are collectively referred to as Project Affected Households (PAHs), which includes members of a household, whether related or not, operating as a single socio-economic and decision-making unit, who are affected by the Project. In other words, as per UBOS, a household is defined as a person or group of persons who normally cook, eat and live together irrespective of whether they are related or unrelated.

EACOP ensured that the Compensation Agreements (CAs) included a Certificate of Attesting Witness and Certificate of Translation to confirm that the PAP understood the CA.

According to the PAH audit survey results, 98.1% of the sampled PAHs reported participating in the assets survey and assessment exercise. Those who did not participate reported that they were unavailable in the project area at the time of the surveys. These had their representatives, such as spouses, participating on their behalf, and Local Council (LC) 1 chairpersons witnessed the entire process.

As far as their understanding of the compensation determination process and the roles of the Chief Government Valuer (CGV) and District Land Boards (DLBs), 80.0% of the sampled Project Affected Persons (PAPs) indicated they understood, while 20.0% reported not to have understood the process of compensation determination. Further analysis revealed variations in PAPs' understanding of the compensation determination process across the Districts, with Mubende (66.3%), Kikuube (67.7%), Sembabule (68.4%), and Hoima (78.6%).

From the KIIs with community leaders and DCCs, the misunderstanding was partly attributed to some PAPs not understanding the roles of CGV and DLB in determining compensation rates, as they thought EACOP determined compensation awards. In addition to explaining these issues to PAPs during the EB/CA signing, EACOP also contracted Third Party Advisors to, inter alia, advise PAPs on the basis of valuation, their legal rights, and the contents of the CAs.

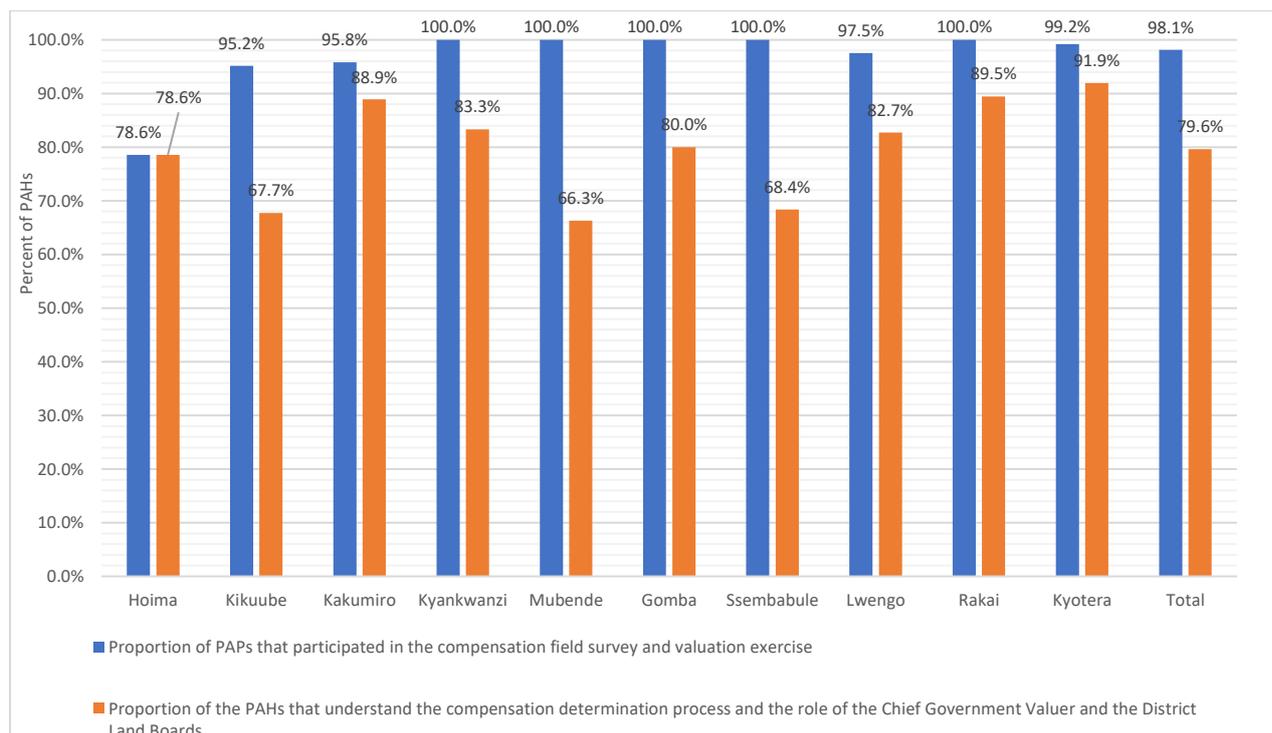
Concerning asset capture, 92.0% reported that their affected assets were adequately documented in the assets survey form. The remaining 8.0% reported that their assets were not adequately captured and they logged grievances with the Project, which, where appropriate, resulted in asset reassessment and preparation of supplementary valuation reports by EACOP.

KIIs outcomes observed that initially, after the CGV approved Valuation Reports, it was discovered that the banana and coffee DCRs for Kyotera were lower than the neighbouring Lwengo DCRs. This anomaly was corrected by the Project — following approval from the CGV to adopt the Lwengo DCR for these items — through an addendum Valuation Report for Kyotera PAPs and the signing of addendum Compensation Agreements (CAs).

KIIs' outcomes also revealed difficulties in some cases with categorizing and analyzing land uses for small parcels, especially in determining whether such plots are commercial or residential. It was observed that those who raised such grievances had their concerns reviewed by EACOP, and where appropriate, their land was re-categorized and reassessed through supplementary valuation reports.

During the survey and FGDs, findings indicated that some PAHs reported that the compensation did not allow them to replace lost assets and/or with assets of similar value. For instance, out of the surveyed PAHs (638), 43 PAPs indicated that the monetary compensation did not allow them to replace affected assets with assets of similar value due to claimed low land rates. Upon further engagement with PAHs, it was concluded that the PAPs in question had unrealistically high expectations for land values, which did not reflect actual land market values and the CGV-approved rates.

Figure 5: Proportion of the PAHs who participated in the Valuation Exercise and understand the compensation determination process and the role of the CGV and DLBs



Source: GMT RAP Implementation Audit PAH Survey, 2024

Other findings: Determination of unviable residual land (URL) valuation was still pending. PAs were aware that the URL would be assessed and compensated for at the time of pipeline construction, as required by the CGV. PAs expressed their wish that the land rates be disclosed early, before they are applied in the assessment of their URL.

### Corrective Actions

None required

### Compliance Level

Based on the above findings, the Project is:

- Compliant with PAs identification and eligibility requirements
- Compliant with the identification and inventory of affected assets
- Compliant with the determination of compensation at full replacement cost.

### Recommended Areas for Improvement

Based on the above audit findings, it would be important that EACOP ensures continued clear communication with PAs, especially regarding the pending valuation of Unviable Residual Land (URL).

## 5.3 Compensation Payment

### Compliance Requirements

The IFC PS5 para 9 requires project proponent to take possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in

addition to compensation. In cases of physical displacement, PS5 para 21 requires the project proponent to offer a choice of replacement property (in-kind compensation) of equal or higher value, security of tenure, equivalent or better characteristics, and advantages of location or cash compensation where appropriate. Compensation in kind should be considered in lieu of cash. Cash compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets. PS 5 para 9 requires compensation standards to be transparent and applied consistently to all communities and persons affected by the displacement. PS5 further requires that documentation of ownership or occupancy and compensation arrangements should be issued in the names of both spouses or heads of households.

Additionally, Article 26(2) of the Constitution of the Republic of Uganda includes a requirement for prompt payment of fair and adequate compensation prior to taking possession or acquiring the property.

### Key observations and findings

The key elements assessed under this audit area are:

- Land acquisition should only take place after compensation has been made available (where not possible, e.g., in case of land ownership disputes, compensation funds shall be made available, e.g., through escrow account deposit before displacement).
- Compensation Assistance.
- Compensation standards should be transparent and applied consistently to all communities and persons affected by the displacement.

The audit established that the implementation of the EACOP Uganda RAP commenced in September 2021 with the opening of PAP bank accounts and the first round of Financial Literacy Training (FLT). This was followed by Entitlement Briefings and Compensation Agreement (EB/CA) signing for PAs PAPs in December 2021 (see Figure 6 showing some of the Project EB/CA signing sessions). A second round of FLT was conducted in March 2021, and EB/CA for PPL RoW PAPs commenced in March 2022. The EB/CA signing process involved the explanation of CAs, Third Party Advisory, Certificates of Attesting Witness, Certificates of Translation, LC1 witness, and PAP witness.

PAPs were paid compensation before the Project took possession of the land. According to the Project Implementation Summary dated 28 October 2024, 99% (or 3,627/3,660) of PAPs had signed their Compensation Agreements (CAs), with 97% (or 3,567/3,660) having received their compensation, as shown in Table 13 below.

Table 13: Summary of Compensation Payments

Description	Number	%age
PAs and PPL RoW PAPs	3,660	100.0%
Signed Compensation Agreements	3,627	99.0%
Compensation Payments Paid	3,567	97.0%

Source: EACOP Uganda (28 October 2024)

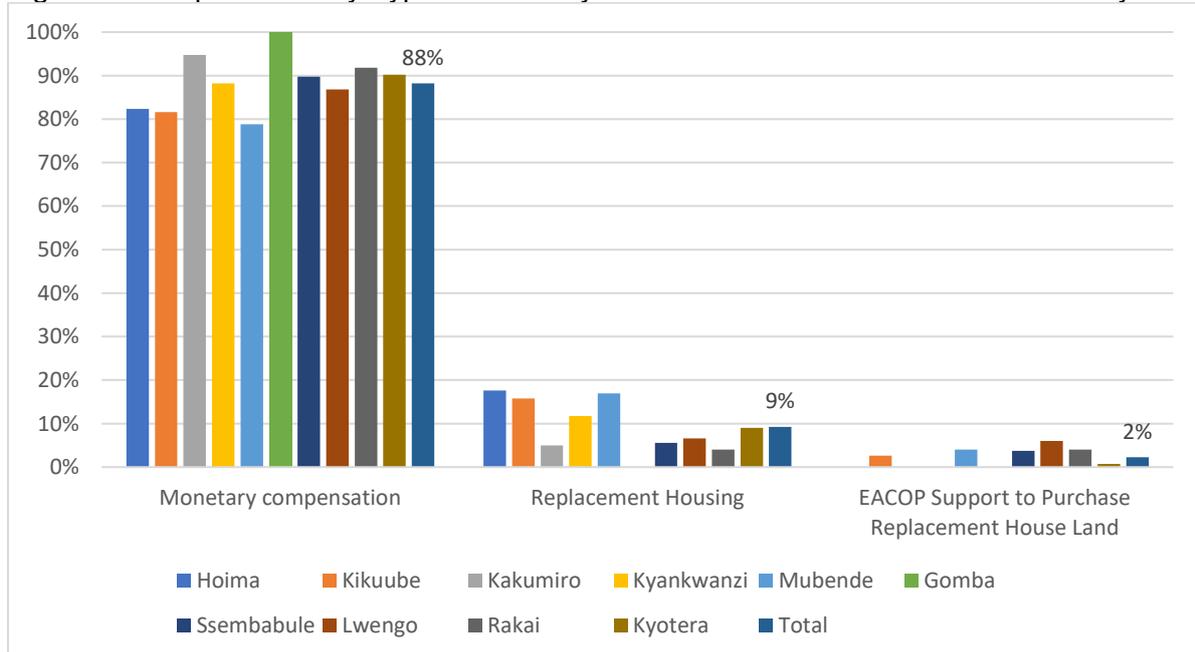
From the PAH audit survey results, 88.0% of the sampled PAHs reported having received monetary compensation, and 9.0% of the sampled PAHs received replacement housing, as shown in Figure 7 below. It is important to note that all sampled physically displaced PAHs received both replacement housing and monetary compensation for their other (non-house) assets.

Figure 6: EB/CA signing sessions



Source: EACOP Uganda (28 October 2024)

Figure 7: Compensation by Type received by the PAPs interviewed in the PAH Survey



Source: GMT RAP Implementation Audit PAH Survey, 2024

In the case of spouses, the CA was jointly signed, the Bank account was jointly held, and spousal consent was required for all documentation and signing of the CAs. Through KILs and FGDs, PAPs confirmed that compensation payments were made through bank accounts opened with Centenary Bank with support from EACOP. They further revealed that joint accounts for spouses helped to alleviate gender-based violence in addition to improved financial inclusivity through financial literacy, money management, and family strengthening that were offered to all PAPs.

Further analysis of the audit survey results revealed that all sampled PAPs who signed their CAs received their compensation packages. Where it was not possible to make compensation available, e.g., in cases of land ownership disputes between PAPs, compensation funds were made available through escrow account deposit.

During the audit KIIs, it was reported that translators were available to interpret EB/CA documents, and a certificate of translation is included in the EB/CA documents, which was also confirmed during the audit review of documents. PAPs were given a 14-day window of reflection on disclosed information, including compensation packages. PAPs who wished to use the 14-day window were given the CAs to go with them and reflect on the information before signing. This was also confirmed during the audit KIIs with PAPs.

According to the Project Implementation Summary of 28 October 2024, 3,560 PAPs were supported by EACOP in Bank accounts opening, 282 were supported in obtaining Letters of Administration, and 80 PAPs were supported in obtaining Powers of Attorney. The sampled surveyed PAPs reported they were assisted in opening bank accounts and receiving other necessary support to access their monetary compensation promptly. Audit survey results indicate that 98.0% (627) of the PAHs reported receiving this support, with 99.0% (632) successfully opening bank accounts. This was the primary form of assistance provided to enable PAPs to access their compensation. Other PAPs reported receiving support to acquire Letters of Administration, Powers of Attorney, and national identification cards, among other documents. This assistance significantly streamlined the compensation process, especially for PAHs who lacked the necessary documentation to substantiate their claims for affected properties, as well as the bank accounts needed for receiving their monetary compensation.

According to the RAP implementation status in Table 2, 60 PAPs are pending compensation payment as of 28 October 2024. These include 28 Escrow PAPs (awaiting confirmation of bank accounts for Hoima and Mubende Court) and 32 PAPs who signed CAs but with pending issues, such as caveats on land titles or awaiting LoA for recently deceased PAPs. The other batch of PAPs (not part of the 3,660) that were yet to be compensated as of 28 October 2024 are PAPs on the Kakumiro PPL Re-route and the Kyotera Former Prison Land. As noted above, compensation to PAPs with claims of unviable residual land is to be addressed at the time of construction.

Regarding the consistent application of compensation standards to all communities and persons affected by the displacement, the audit established that PAPs were offered compensation packages based on the type of displacement. Economically displaced PAPs received monetary compensation, while physically displaced PAPs (depending on their ownership interest in the affected land) were offered a replacement housing option and could choose either a replacement house or monetary compensation.

The Project RAP identified 195 physically displaced (PD) PAPs, of whom: 175 opted to receive replacement houses, 5 were within the Taala Central Forest Reserve (CFR) (a designated protected area) and not eligible for replacement housing (reflecting their informal occupancy with no formal land rights according to the national law), and 15 opted for monetary compensation.

Out of the 175 PAPs that opted for replacement houses, 139 had sufficient residual land or owned existing alternative land on which EACOP constructed the replacement house. The remaining 36 PAPs had insufficient residual or alternative land and were supported by EACOP to purchase replacement house land (minimum 0.3 acres). This EACOP support included: due diligence on the suitability of the identified land for a replacement house, survey and preparation of survey drawing confirming the land size for purchase, preparation of a tripartite land purchase agreement between the vendor, PAP, and EACOP, and paying the purchase price (which included the statutory compensation value for the affected land) on behalf of the PAP.

In accordance with the Project RAP, EACOP confirmed during the audit KII that they are committed to providing the 5 Taala physically displaced PAPs with secure access to alternative land, where they can resettle without facing the risk of forced eviction. EACOP plans to purchase one (1) acre of land for each of the five PAPs.

The 15 PD PAPs that opted for monetary compensation to build their own houses had sufficient residual or alternative land.

### **Corrective Actions**

None required

### **Compliance Level**

The Project is:

- Compliant with the requirements of land acquisition only after compensation has been made available
- Compliant with compensation assistance
- Compliant with the consistent application of compensation standards

### **Recommended Areas for Improvement**

None required

## **5.4 Vulnerable Persons Assistance**

### **Compliance Requirements**

IFC PS1 para 12 requires a project proponent to identify individuals and groups that may be directly and differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. Where individuals or groups are identified as vulnerable, the project will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on them, and they are not disadvantaged in sharing development benefits and opportunities. PS5 para 19 requires that particular attention should be paid to the needs of the poor and the vulnerable.

The Uganda Gender Policy, 2007 guides that national planning, resource allocation, and implementation of development programs should be undertaken with a gender perspective by establishing a framework for identification and implementation of interventions designed to achieve gender equality and women's empowerment in Uganda. In the context of this Project, the policy aims to address imbalances arising from existing gender inequalities and to promote women's participation at all Project stages, as well as equal access to and control over significant economic resources and benefits. The policy also requires proper resettlement planning with due attention to gender disparities and needs, starting with equitable access to resources and gender-sensitive decision-making during resettlement (which is also provided for in Section 40 of the Land Act Cap 227 as amended, which provides for spouses' consent in property matters).

The National Policy on Elimination of Gender Based Violence, 2016 emphasises early intervention to prevent re-victimisation of and long-term effects for girls, including interpersonal violence, sexual coercion, alcohol and drug abuse, and mental health problems, reporting cases of violence against children immediately.

The National Policy for Older Persons, 2009 obliges the Project to ensure that vulnerabilities associated with age are identified and appropriate response measures integrated into RAP

activities. All categories of vulnerable elderly PAPs should be identified, consulted and their views considered. Special assistance measures for elderly PAP have to be implemented in the RAP including representation in the grievance mechanism.

The National Policy on Disability, 2016 aims to ensure that the capacity of Persons with Disabilities (PWDs) and their care-givers to access essential services and entitlements is enhanced. The Project should have measures and strategies of ensuring participation of PWDs in the planning, and implementation of the RAP activities.

The Uganda National Youth Policy, 2016 is premised on the need to address a range of challenges faced by youth in the development processes. The Policy requires that RAPs be implemented in line with improving youth involvement and participation including representation on the grievance mechanism.

### **Key observations and findings**

The key elements assessed under this audit area are:

- Identification of Vulnerable Persons and groups.
- Particular attention paid to the needs of the poor and the vulnerable.

In compliance with IFC PS5 and national policies, EACOP identified vulnerable persons affected by the Project. The vulnerable persons were in three categories below:

- Category 1: 'Vulnerable' Persons as households headed by either:
  - A person below 18 years
  - 65 years and above
  - Female
  - Chronically sick
  - Disabled person (physical, mental, blind, deaf, hearing impairment).

And with at least one of the following contributing factors:

- Household head is living alone without family support
  - Household head has no income
  - PAP is heading a large household of more than 5 persons comprising mainly persons of below 18 years
  - None or only 1 member of the household is earning income.
- Category 2: 'Potentially Vulnerable' as households headed by either:
    - A person below 18 years
    - 65 years and above
    - Female
    - Chronically sick

- Disabled person (physical, mental, blind, deaf, hearing impairment).

And that they do not qualify under category 1 but with less than 0.5 acres of land remaining or losing more than 80% of their land and without any other land holdings.

- Category 3: 'At risk' persons included:
  - Married women affected by the displacement and likely to be abandoned by their husbands, threatened with divorce or separation after compensation, women in polygamous marriages who may not receive an equitable share of the compensation, and women who may be excluded from benefiting from the compensation because they are not legally married and due to cultural practices, such as inheritance. These category 3 individuals comprise a number of household members, as opposed to the number of PAPs
  - During disclosure, entitlement briefings and other engagements with households, attention shall be given to identifying household members who may be at risk (e.g. where a household head refuses for their spouse to be party to the entitlements briefing and/or compensation agreement signing etc.). Where a household member is identified that have vulnerable factors (i.e. disabled, chronically sick, dependency on other household members etc.) during the ongoing work these household members may be categorized as Category 3 'At Risk' and more focus would be given to structuring the PAHs livelihood restoration package appropriately. Additional focus on these individuals during engagements and monitoring will be made. The Project may also offer specific household individuals who are 'At-Risk' during the displacement direct access to one of the livelihood programs.

The Project RAP put in place a number of vulnerable persons assistance programs including:

- Additional livelihood restoration, transitional support and resettlement/relocation entitlements.
- Access to a livelihood restoration program for women household members identified during further engagement as 'at-risk' vulnerable persons.
- Consultations and Information disclosure: Appropriate scheduling of consultation and disclosure of information, including visiting the home of the affected person/household.
- Attendance of Spouse: During disclosure, entitlement briefings, and compensation agreement signing, spouses will be required to attend. A PAP support services consultant will facilitate the presence of women and vulnerable household members at all stages of the land acquisition process.
- Spousal Consent and Joint Bank Account: The Project compensation agreement includes a spousal consent, and the Project will set up joint bank accounts for PAPs and their spouses. Gender sensitivities will be focused on during these processes.
- Financial Management Training: Disagreements over sharing/utilization of the compensation and the form of compensation could potentially increase the risk of Gender Based Violence (GBV). A series of financial management training sessions will be provided to men and women from all households prior to them receiving monetary compensation. The training will aim to reduce the risk of misuse of compensation and cover key issues related to gender, including raising awareness of the increased risk of GBV.

- Gender Considerations: The Project provides support to open joint bank accounts; the financial management training will target both men and women and will include raising awareness of gender issues related to the land acquisition and compensation process.
- Complementary interventions to support and empower women organized as part of the Project Social Investment/Community Development Program.
- Transitional support and livelihood restoration offered by the Project and structured to ensure vulnerable members of the households can receive the support required and this will not necessarily be targeted only to the household head.
- The Project, where appropriate, will work closely with vulnerable PAP and the designated next of kin or guardian.
- As well as transitional support (food rations), transportation will also be provided for physically displaced vulnerable households. Specific attention will be paid to the planning of the relocation of these PAPs
- Targeted monitoring of the vulnerable households.

Regarding particular attention paid to the needs of the poor and the vulnerable, audit surveys, KIIs, and FGDs confirmed that the Project:

- Ensured joint bank accounts and spousal consents for both spouses.
- Ensured attendance of spouses at disclosure & EB/CA signing.
- Provided transportation for physically displaced vulnerable households.
- Undertook disclosures and increased visits to affected vulnerable households.
- Provided financial literacy, money management, and family strengthening training.
- Increased access to transitional support of food baskets through delivery to vulnerable PAHs homes.

Additionally, during the RAP implementation phase, the audit established that EACOP implemented the following specific gender inclusion and GBV prevention activities:

- Prevention and response to GBV: Community awareness about GBV, mediation and counselling for particular cases, and referrals of GBV cases to other service providers.
- Strategic quarterly gender engagement meetings with CSOs and the District local government Gender and Community-Based Services department: To seek their inputs and assess the impact of EACOP interventions for addressing GBV.
- Mediation of conflicts: for example, claims of inequitable sharing of compensation between PAP and spouse.
- Gender integration into Livelihood Restoration Support: To ensure inclusive access, participation, and ownership of resources provided through EACOP's LR support.
- Gender monitoring within support to Vulnerable PAPs: Promoting gender inclusion in special support provided to vulnerable PAPs.

- Mentorship and coaching of youth in life skills: Empowering youth to take control of their lives, relying less on others, and being capable of handling everyday tasks and challenges.

PAPs reported that the above support was beneficial, especially the beneficial effects of the family strengthening, money management, and financial literacy training on harmony and avoiding gender-based violence between spouses. During the FGDs with women PAPs, re-occurring behavior of gender-based violence was reported by PAPs. To increase the sustainability of this training, vulnerable PAPs requested follow-up training. During the KII, EACOP confirmed that it will offer a third round of training in financial literacy, money management, and family strengthening.

The audit confirmed that EACOP offered psycho-social support to PAPs impacted by RAP activities such as grave relocation. This was also confirmed through audit interviews with PAPs who had graves and the psycho-social contractor.

### **Corrective Actions**

None required

### **Compliance Level**

Based on the above findings, the Project is:

- Compliant with the identification of Vulnerable Persons and groups.
- Compliant with paying particular attention to the needs of the poor and vulnerable.

### **Recommended Areas of Improvement**

- Offer a third training in Financial Literacy, Money Management, Family strengthening, and gender to mitigate any emerging risks of gender based violence.
- Undertake ongoing internal monitoring of vulnerable persons for potential need of additional LRP packages

## **5.5 Delivery of Transitional Support**

### **Compliance Requirements**

The IFC PS5 para 29 requires that transitional support should be provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.

### **Key observations and findings**

In terms of provisions of transitional support, the Project offered the following:

- Two (2) rounds of financial Literacy and Money Management Training for all PAPs, and a third round has been planned
- Transporting(moving) physically displaced (PD) PAPs and vulnerable PAPs and their belongings to their new dwellings
- Food Basket support to eligible PAPs for immediate food security after compensation payment and coming into force of the NTV.

95.1% of the sampled households in the audit survey reported that they attended and participated in the financial literacy training programs. In Kikuube and Hoima Districts, all (100%) sampled PAHs confirmed to have undergone financial literacy training, while more than 90.0% in other districts reported the same, except in Gomba, where 80.0% reported having received the training. Of those who participated, 89.0% indicated that the training had been generally beneficial, with the highest positive response in Kyankwanzi (97.0%). Overall, there was a favorable perception of financial literacy training among PAHs across all districts impacted by the Project (see Figure 9 for details). Through the FGDs, PAPs reported that this training helped them appreciate the importance of using monetary compensation appropriately, improving household relationships, especially with their spouses, and developing budgeting skills.

The audit identified positive outcomes from EACOP's family strengthening, money management, financial literacy training, GBV awareness, and assistance in issuing documentation of ownership or occupancy and compensation agreements, as well as bank accounts in the names of both spouses. It was reported that this resulted in minimal cases of Gender-Based Violence, and the stimulation of harmony so that spouses stayed together.

The audit also established that EACOP provided moving assistance to physically displaced PAPs, especially those who opted for replacement houses. PAPs were supported to move their household items from the former affected house to the new replacement house as shown in Figure 8 below.

Regarding food basket support, the audit KII with PAPs, community leaders, DCCs, and EACOP revealed that PAHs were provided with food baskets, which commenced upon the expiry of the Notice to Vacate (NTV) following receipt of the compensation payment. These food rations are provided for 6 - 12 months post-displacement. During the audit FGDs, PAP beneficiaries reported receiving posho, beans, sugar, salt, and cooking oil. Figure 10 shows the delivery of baskets to the homes of PAPs. The food baskets have been very helpful in ensuring food security during the transitional period.

The audit noted that to date, 86.0% (or 1,949) eligible PAHs commenced the program. 45.0% (or 1,020) PAHs have completed the program, while 41.0% (or 929) PAHs are still receiving food baskets, as shown in **Error! Reference source not found.** below.

Table 14: Delivery of Food Baskets Support as at 28 October 2024

Description	Number	%age
PAs and PPL RoW PAPs	3,660	100%
Number of PAHs	3,588	98%
Number of PAHs eligible for Transitional Support (food baskets)	2,257	62%
Transitional Support commenced (%of eligible)	1,949	86%
Transitional Support completed (%of eligible)	1,020	45%

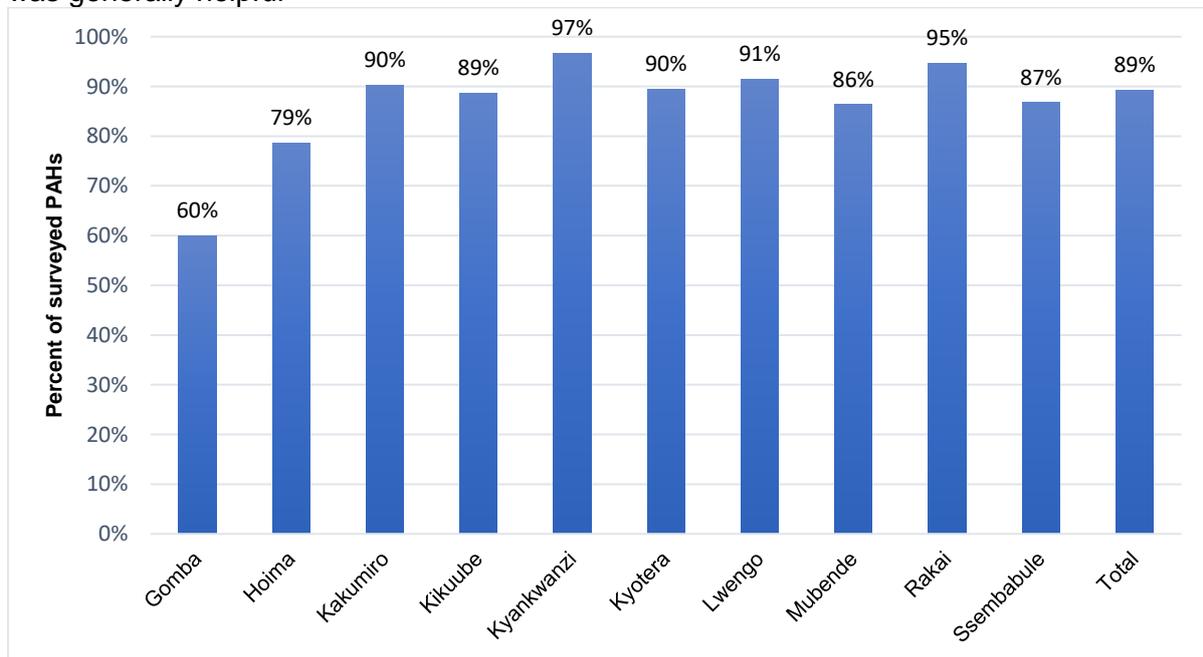
Source: EACOP Uganda (28 October 2024)

Figure 8: Relocation Support to PAPs



Source: EACOP Uganda (28 October 2024)

Figure 9: Proportion of the Surveyed PAHs who indicated that the financial literacy training was generally helpful



Source: GMT RAP Implementation Audit PAH Survey, 2024

Figure 10: Delivery of food baskets at PAPs' homes



Source: EACOP Uganda (28 October 2024)

The audit also observed from the sampled PAHs visited that received or were receiving food baskets, the deliveries had been recorded accurately by the EACOP contractor in the PAPs' Food Basket passports, and PAPs confirmed that they had received them.

During the audit KIIs, it was reported that for vulnerable or disabled persons, the food baskets were brought up to their homes.

Approximately 14.0% (or 308) of eligible PAHs for food baskets had not yet commenced the program at the time of audit. During FGDs with PAPs and women, it was observed that some PAPs did not fully understand the eligibility/entitlement criteria for food baskets, and requested the Project to undertake additional engagements on food baskets. Some PAPs perceived that some people not entitled received food baskets, and those entitled missed out.

### Corrective Actions

None required

### Compliance Level

Based on the above findings, the Project is Compliant with the provision of Transitional Support to PAPs.

### Recommended Areas of Improvement

Undertake additional stakeholder engagements with PAPs on eligibility criteria for food baskets, especially for those remaining PAPs yet to be enrolled.

## 5.6 Livelihood Restoration and Improvement

### Compliance Requirements

The IFC PS5 para 9 requires that where displacement cannot be avoided, displaced communities and persons should be offered compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods. The standard requires that besides compensation, affected persons and communities should be provided adequate livelihood restoration and improvement programs established based on the project impacts.

### Key observations and findings

In terms of provision of adequate livelihood restoration and improvement programs, the EACOP Uganda RAP set out the following LR support programs:

- Food Security: establishing vegetable gardens.
- Crop Productivity Enhancement and Diversification.
- Livestock Rearing and Productivity Enhancement.
- Vocational Skills and Enterprise Development Training Program.

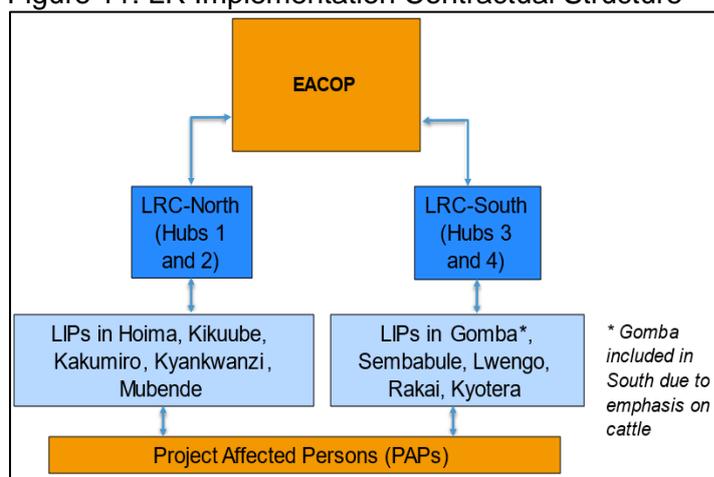
The above LR support programs are being implemented through Livelihood Restoration Coordinators (LRCs) namely Montrose Africa Limited for Hoima to Mubende and Asigma Capital Advisory Group Limited for Gomba to Kyotera section. The LRCs are the overarching contractors that subcontract Local Implementing Partners (LIPs) and provide technical, managerial, quality control, and monitoring of LR package delivery to PAPs. The details of the LRCs and LIPs are shown below

Table 15: Details of EACOP Uganda LRCs and LIPs

District	EACOP Component	LRCs	LIPs
Hoima	PPL RoW	Montrose Africa Limited	<ul style="list-style-type: none"> <li>• Hoima Caritas Development Organisation (HOCADAO)</li> <li>• St Simon Peter Vocational Training College, Hoima</li> <li>• Buhimba Vocational Technical Institute</li> <li>• HOCADAO in partnership with Caritas Mubende</li> <li>• St Peter Vocational Training College, Mubende</li> </ul>
Kikuube	PPL RoW		
Kakumiro	MCPY-1		
	PPL RoW		
Kyankwanzi	PPL RoW		
Mubende	MCPY-2 and access road		
	PPL RoW		
Gomba	PPL RoW	Asigma Capital Advisory Limited	<ul style="list-style-type: none"> <li>• Community Integrated Development Initiatives (CIDI)</li> <li>• St Charles Lwanga Butende Technical Institute</li> <li>• Mummy's Institute of Beauty, Design and Commercial Studies</li> </ul>
Sembabule	MCPY-3		
	PS-2, helipad, and access road		
	PPL RoW		
Lwengo	PPL RoW		
Rakai	PPL RoW		
Kyotera	MCPY-4 and access road		
	PPL RoW		

The LR implementation contractual and reporting arrangements shown in Figure 11 below.

Figure 11: LR Implementation Contractual Structure



According to the Project Implementation Summary dated 28 October 2024, the Project has a total of 3,400 PAPs (PAHs) eligible for Livelihood Restoration programs, and presently, 86% commenced the LR support programs (see Table 16 & Figure 12 below ).

Table 16: Progress of LR Support

Description	Number	%age
PAs and PPL RoW PAPs	3,660	100%
Number of PAHs	3,588	98%
Number of PAHs eligible for Livelihood Restoration	3,400	93%
Livelihood Restoration commenced (% of eligible)	2,938	86%
Livelihood Restoration completed (% of eligible)	0	0%

Source: EACOP Uganda (28 October 2024)

Figure 12: Some of the EACOP delivered LR Support



Source: EACOP Uganda (28 October 2024)

It is important to note that the findings below are preliminary and pertain to LR support activities. These activities will undergo further external monitoring and review during forthcoming periodic LR monitoring and reviews.

According to the audit survey analysis, 97.0% of the sampled PAHs reported receiving livelihood restoration support. In terms of LR support training, 95.5% of the sampled households reported that they received training in various livelihood restoration areas. This included training in vegetable growing (91.0%), crop growing (97.0%), and livestock rearing (12.0%). However, there was limited training in other areas such as adding value to animal products (0.5%), household businesses (0.2%), entrepreneurship (0.5%), wage-paid jobs (0.2%), building construction (2.0%), welding (3.0%), tailoring (3.0%), and marketing (0.8%). It was noted that enterprise development training programs had not yet commenced at the time of the audit survey.

Regarding the application of learned skills, the audit survey, for example, found that PAPs are implementing techniques like planting in lines (85.0%), maintaining correct spacing (88.0%), controlling weeds (56%), and proper produce handling post-harvest (51.0%). The highest adoption rates were observed in Gomba district (70%), Kyankwanzi (69.0%), Rakai (64.0%), and Hoima (64%). However, the adoption of other skills among the surveyed PAHs was still low in some areas such as milk preservation (2.0%), raising seedlings for sale (6.0%), and vocational skills among the youth, including building construction (1.0%), welding (1.0%), and tailoring (2.0%) (see Table 17 below). During the KII, EACOP reported that only PA PAH Youth household members had completed vocational training at the time of the Audit.

Table 17: Proportion of PAHs Applying LR Training Skills per the Audit Survey

Skills Adopted	Hoima (n=14)	Kikuube (n=62)	Kakumiro (n=72)	Kyankwanzi (n=30)	Mubende (n=95)	Gomba (n=5)	Ssembabule (n=98)	Lwengo (n=81)	Rakai (n=57)	Kyotera (n=124)	Total (638)
Replicated planting in lines	93%	85%	85%	93%	71%	100%	82%	94%	87%	87%	85%
Replicated correct spacing	79%	85%	88%	93%	72%	100%	89%	98%	96%	92%	88%
Replicated weed control	93%	95%	90%	83%	8%	75%	46%	44%	69%	50%	56%
Adopted proper harvesting techniques	50%	56%	65%	53%	24%	25%	42%	52%	58%	64%	51%
Raised seedlings for sale	0%	5%	13%	23%	0%	0%	10%	2%	11%	3%	6%
Milk preservation	0%	0%	0%	0%	4%	0%	8%	1%	0%	1%	2%
Building construction	0%	0%	0%	0%	0%	0%	2%	0%	0%	2%	1%
Welding	0%	0%	0%	0%	1%	0%	2%	0%	0%	3%	1%
Tailoring	0%	0%	0%	0%	4%	0%	4%	0%	0%	5%	2%
Not put to practice yet	0%	0%	4%	0%	10%	0%	4%	0%	0%	3%	3%
Others	7%	2%	1%	0%	20%	50%	12%	2%	0%	3%	7%

Source: GMT RAP Implementation Audit PAH Survey, 2024

Some PA PAPs whose youth household members received and completed vocational skills training have gained seasonal employment. Youths who undertook the welding course reported that although they received tools as starter packs, welding discipline requires more tools, such as a grinding machine, for one to start their own business and achieve self-reliance.

85.1% of the sampled PAHs reported that the enrolment process into the LR support programs is fair for all categories of PAPs, including women and vulnerable people, because it follows EB/CA signing, in which agreements are executed in joint names in case of spouse. This allowed vulnerable persons to fully participate and benefit from the LR programs.

52.7% of the PAHs reported that they were very satisfied with the LR programs delivered by the Project, compared to 37.8% that are moderately satisfied with the programs. 69.6% of the surveyed PAHs reported that the Project has improved their living standards (better than before) compared to their pre-displacement conditions, while 21.9% reported that their

living standards have been restored (same as before displacement). Through the key informant interviews, PAHs reported that they have acquired replacement houses, constructed their own houses, purchased household items, bought livestock and land for agriculture, acquired agricultural and entrepreneurial skills, and their youth are undertaking vocational training.

8.5% reported that their living standards had worsened because they were no longer able to access sufficient land to support their livelihoods. During the audit site visits to the former Taala Central Forest Reserves PD PAPs, it was established that some of these PAPs continue to access the forest land to carry out their agricultural livelihood activities including planting the crop seed starter pack provided by EACOP. According to the RAP Report commitments, the Project was required to work together with Kyankwanzi district local government and other authorities to help these PAPs secure access to alternative land where they can resettle without facing the risk of forced eviction. During the audit KII, EACOP committed to purchase one (1) acre parcel of land for each of the five (5) Taala physically displaced PAPs to ensure their security of tenure.

Additionally, 79.5% of surveyed households in the audit reported being food secure in the last 6 months, with some citing the fact that they are still recipients of food baskets in addition to having improved harvests from the starter pack seeds they planted in the first season of 2024. This performance will be tracked as part of the periodic external LR monitoring and review when such households eventually exit the food basket support.

PAHs in the audit survey also reported an increase in household agricultural production, with 54.6% (or 348) of households reporting a positive change in household produce, compared to 39.3% indicating no change. The increase was reported in crops such as maize, beans, and cassava. However, some of the PAHs that received input starter pack of maize and beans reported low germination, mainly attributed to late delivery and drought in the first season of 2023 & 2024.

In terms of diversification of livelihood sources, 39.7% of the surveyed households reported the addition of other livelihoods, including vegetables, maize, beans, livestock such as cattle, small-scale piggery, and the sale of water from rainwater tanks, as well as transport (boda boda).

Livelihood restoration programs resulted in improved (better than before) relationships between family members at 53.1% of the households in the audit survey, with 39.8% reporting that the relationship remained the same. 7.1% of the households reported that their relationships had worsened mainly due to failure to share LRP packages, especially the agriculture starter pack, among family members.

Feedback from the audit FGDs and KIIs is that LR activities—through demonstration gardens and the adoption of best agricultural practices—generally led to increased production. As a result, there were bumper harvests of vegetables, but limited markets for the surplus, especially maize, sukuma wiki, and eggplants.

During KIIs, it was recommended that PAPs receive support from LR officers at the household level to ensure a self-sustaining community system. Additionally, EACOP was advised to consider linking them to government programs, such as the Parish Development Model (PDM), to strengthen saving and loan groups and create market linkages.

### **Corrective Actions**

None required

### **Compliance Level**

No rating is possible yet, as the LR support activities are still ongoing. The interim findings from the audit survey indicate that a proportion of PAH livelihoods have improved (69.6%),

been restored (21.9%), and not been restored (8.5%). The LR activities will be subject to external monitoring and review during the forthcoming periodic assessments.

### **Recommended Areas for Improvement**

From the above findings, some of the key recommended areas for improvement in the delivery of LR support programs are:

- Undertake additional stakeholder engagements with PAPs who have inadequate information on eligibility criteria for the different LRP packages and ensure all enlisted PAPs are covered during (additional) package selection.
- Provide an additional round of LR support to PAPs who got low crop yields. Engage timely with the relevant stakeholders to avoid or mitigate delays so that crop calendars are respected.
- Expedite the enrolment of the remaining 462 eligible PAPs for LR activities
- Continue cooperation with demonstration sites, especially since they are still needed to train PAHs yet to be enrolled on LR programs.

## **5.7 Community Cohesion and Social Disarticulation**

### **Compliance Requirements**

The IFC PS5 para 9 also requires the project proponent to provide opportunities to displaced communities and persons to derive appropriate development benefits from the project.

### **Key observations and findings**

In terms of offering opportunities for displaced communities to derive appropriate development benefits from the Project, EACOP is committed to providing in-kind replacement of water sources affected by the Project's land acquisition. This includes the establishment and training of the respective Water Management Committees (WMCs). EACOP is also committed to drilling boreholes as part of the Company Social Investment Strategy to benefit the wider Project Affected Communities (PAC).

EACOP has a Social & Environmental Investment (SEI) and Corporate Social Responsibility (CSR) Strategy. As part of this strategy, the Project provided opportunities for non-PAPs to attend agricultural training at the demonstration gardens with EACOP reporting that approximately 400 non-PAPs have participated. Other examples included in this strategy for non-PAPs that have not yet been implemented include the extension of additional livelihood improvement activities to non-PAPs (e.g., commercial linkages to off-takers and out-grower schemes).

To foster community cohesion and to avoid or minimize conflict between PAPs and non-PAPs, the extension of benefits to non-PAPs should be further implemented.

### **Corrective Actions**

None required

### **Compliance Level**

The Project is Compliant as it has committed to offering opportunities for displaced communities and improving social cohesion by providing LR support training to non-affected PAPs, in addition to future social investments for the benefit of Project Affected Communities.

## Recommended Areas of Improvement

- Give priority to further implementation of the EACOP Social and Environmental Investment Strategy at the community level through additional livelihood improvement activities.
- Continue to sensitize affected communities about non-PAPs being able to access EACOP LR agricultural training.

## 5.8 Implementation of Grievance Management Mechanisms

### Compliance Requirements

IFC PS1 para 2 requires project proponents to establish a grievance mechanism that facilitate early indication of, and prompt remediation for those who believe that they have been harmed by a project proponent's actions. PS1 key objectives also require that grievances from affected communities and stakeholders are responded to and managed appropriately.

IFC PS1 para 35 further requires that the grievance mechanism should enable the rapid resolution of grievances, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, at no cost and without retribution. The mechanism should not impede access to judicial or administrative remedies. The Project should inform affected communities about the existence of the mechanism and how to access it through stakeholder engagement processes.

IFC PS5 requires that a grievance mechanism should allow the project to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely manner, including a recourse mechanism designed to resolve disputes in an impartial manner.

### Key observations and findings

The key audit findings on implementation of grievance management focused on the following key elements:

- Early establishment of the grievance mechanism early in the development phase.
- Establishment of an accessible and responsive grievance mechanism.
- Awareness about the grievance mechanisms.
- Documentation and reporting of grievances.
- Grievance Mechanism allowing recourse to alternative judicial or administrative remedies.

The Project RAP includes a grievance procedure which was widely disseminated during the RAP preparation and implementation phase through stakeholder engagements.

EACOP established a grievance mechanism (GM) early during the RAP planning phase (see RAP Report Chapter 4). During the planning phase, Local Resettlement Committees were established at the village level (for all 171 villages), which facilitated the resolution of grievances related to land disputes, asset and cadastral surveys.

EACOP GM includes multiple channels for reporting and submitting grievances. These include: EACOP Community Liaison Officers (CLOs), Telephone using the EACOP toll-free line 0800 216 000, direct contact with EACOP Grievance Administrator, Email at [grievances.ug@eacop.com](mailto:grievances.ug@eacop.com), walk-in to any nearby EACOP offices, EACOP Contractor or sub-contractor staff, etc. Figure 13 below shows GM awareness raising sessions.

A significant proportion of PAPs in the audit survey — 76% — reported being aware of and informed about the availability of the project's grievance mechanism. Among the project districts, Kikuube had the highest awareness rate, with 95% of PAPs acknowledging the existence of the grievance mechanism, followed closely by Mubende at 93% (see figure below).

The review established that the Project documents and tracks all grievances through the field Grievance register books and Borealis electronic management software for stakeholder management, including progress reporting. Through a document review of Project grievance records, the audit noted that the Project had registered 995 grievances and 977 (98.2%) had been resolved, leaving 18 grievances pending as of 28 October 2025.

Figure 13: EACOP Grievance Mechanism Awareness sessions



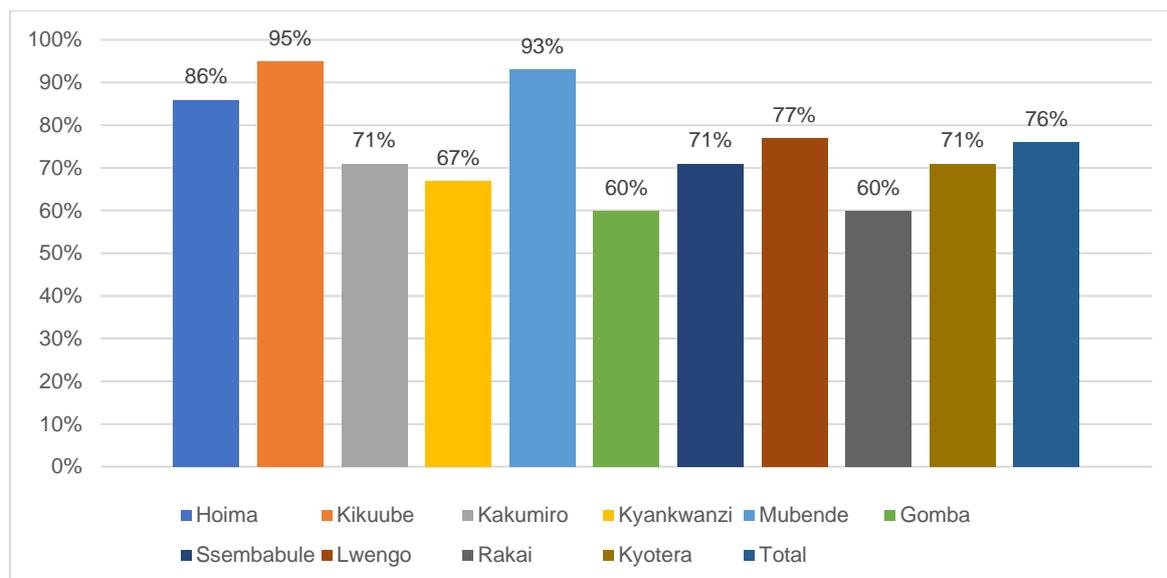
Source: EACOP Uganda (28 October 2024)

The audit survey found that 27% of the sampled PAHs reported having logged grievances with the grievance management mechanism and that their grievances were resolved.

The Project grievance mechanism includes PAPs having the opportunity to proceed to the courts of law when not satisfied with the resolutions of the grievance mechanism. EACOP issues a formal escalation letter to the grievant, verifying that all channels of the EACOP grievance process were utilized.

During the audit KIIs and FGDs, some PAPs reported that they felt somewhat uncomfortable at the mention of “use of courts of law” as part of the grievance management process. EACOP communicated this as part of the compliance with IFC PS 1 para 35, which requires the grievance mechanism not to impede access to judicial or administrative remedies.

Figure 14: Proportion of surveyed PAPs aware of the existence of Grievance Mechanism per PAH Survey



Source: GMT RAP Implementation Audit PAH Survey, 2024

### Corrective Actions

None required

### Compliance Level

The Project is:

- Compliant with the Establishment of the grievance mechanism (GM) early in the development phase
- Compliant with accessible and responsive GM
- Compliant with PAPs' awareness about GM
- Compliant with Grievance documentation and reporting
- Compliant with the inclusion of a recourse to alternative judicial or administrative remedies.

### Recommended Areas of Improvement

EACOP already provides ongoing communication to PAPs and other stakeholders on the grievance mechanism. It is essential to continue these communications for the remainder of the RAP implementation and construction.

## 5.9 Replacement Land Acquisition and Processes

### Compliance Requirements

IFC PS5 para 28 requires that, for affected persons whose livelihoods are land-based, replacement land with a combination of productive potential, locational advantages, and other factors at least equivalent to that lost be offered, as a matter of priority, in addition to compensation for any lost assets.

## Key observations and findings

This audit area focused on offering replacement land to PAPs. According to the Project RAP Report, Chapter 6<sup>27</sup> most PAPs had only a small percentage of their land affected by the Project due to its linear nature.

The Project RAP identified 195 physically displaced (PD) PAPs, of whom: 175 opted to receive replacement houses, 5 were within the Taala Central Forest Reserve (CFR) (a designated protected area in Kyankwanzi District) and not eligible for replacement housing and relocation support (reflecting their informal occupancy with no formal land rights according to the national law), and 15 opted for monetary compensation.

Of the 175 physically displaced PAPs who opted for replacement houses, EACOP supported 36 PAPs whose residual or alternative land was inadequate for both replacement housing and livelihood support by purchasing replacement land (minimum 0.3 acres). The EACOP support included undertaking due diligence on the suitability of the identified land for a replacement house, survey and preparation of survey drawing confirming the land size, preparation of a tripartite land purchase agreement between the vendor, PAP, and EACOP, and paying the purchase price (which included the statutory compensation value for the affected land) on behalf of the PAP.

During the audit site visits to former Taala Central Forest Reserves PAPs, it was found that some of these PAPs continue to access forest land to carry out their agricultural livelihood activities, including planting crop seed starter packs provided by EACOP. According to the RAP Report commitments, the Project was required to work with Kyankwanzi District Local Government and other authorities to assist these PAPs in securing access to alternative land where they can resettle without facing the risk of forced eviction. During the audit KII, EACOP committed to purchase one (1) acre of land for each of the five (5) Taala physically displaced PAPs to ensure their security of tenure. These PAPs also received monetary compensation for their affected houses, transitional support, and livelihood restoration support packages, including 12-month food baskets.

The 15 physically displaced PAPs who opted for monetary compensation included 4 licensees (not eligible for a replacement house) and 11 PAPs with sufficient residual land or existing alternative land.

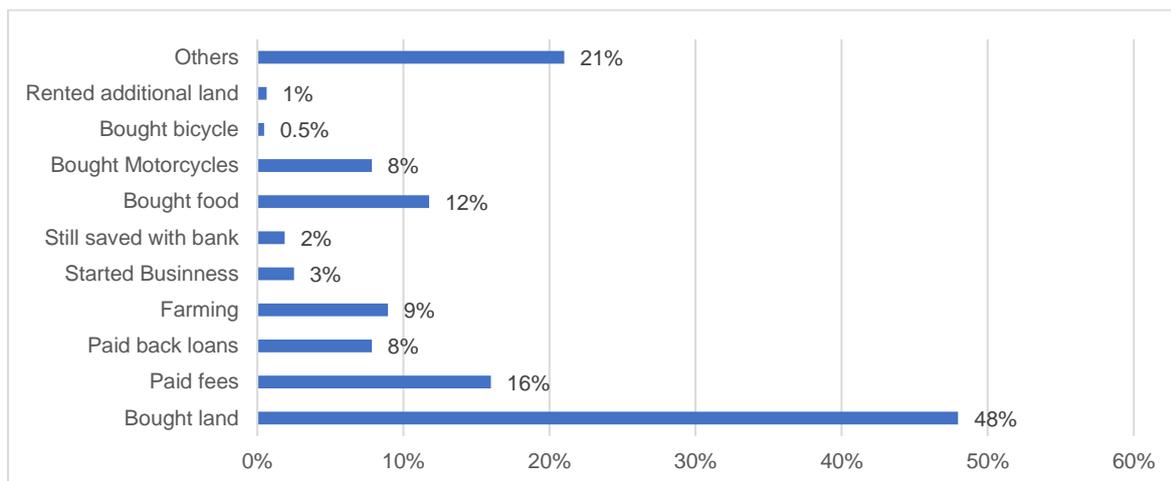
Regarding economically displaced PAPs who were all compensated through monetary compensation, the audit sought to establish how they utilized their compensation. 48.0% of the sampled PAHs purchased land in addition to using the remaining funds (52.0%) to build or renovate their homes, buy furniture, buy a motorbike or bicycle, pay for their children's tuition, or take care of other outstanding debts (see Figure 15 below).

Further analysis of the 48.0% of the sampled PAPs that used the compensation money to replace their own lost land revealed that Kakumiro had the highest proportion at 60.0%, followed by Kyotera (56.0%) and Lwengo (53.0%). In contrast, Gomba had no surveyed PAPs who used the funds for land replacement (see Figure 16 below) because they had sufficient residual land.

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<sup>27</sup> 34% of land areas have less than 10% of their area affected by the Project; 55% of land areas have less than 20% of their area affected by the Project; 70% of land areas have less than 30% of their area affected by the Project; and only 15% of land areas have 50% or more of their area affected by project.

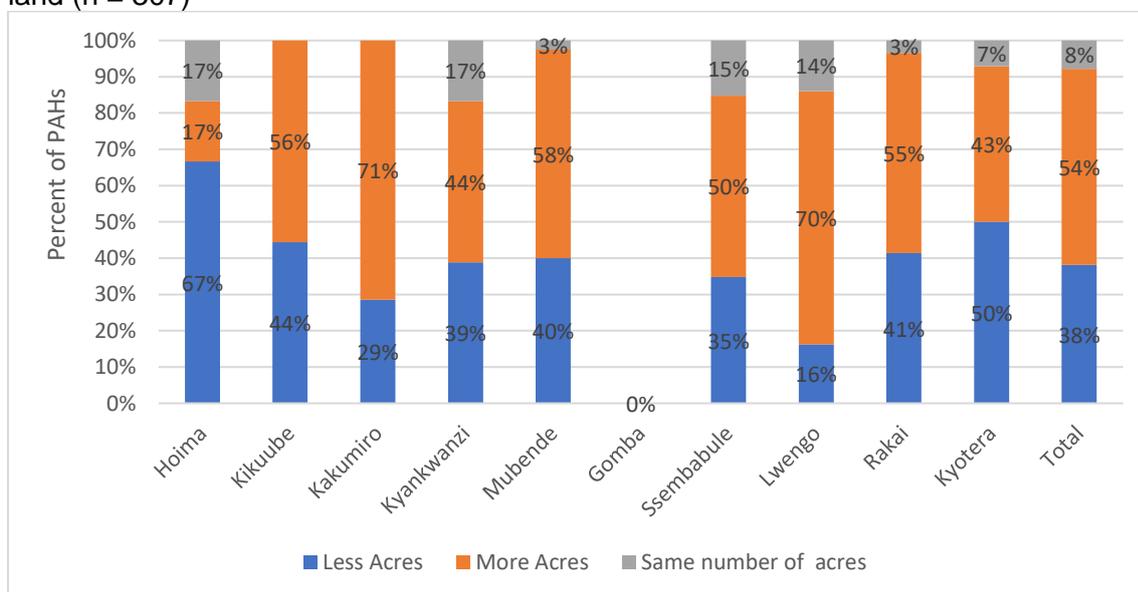
Figure 15: Utilization of the monetary compensation by Surveyed PAHs



Source: GMT RAP Implementation Audit PAH Survey, 2024

Additionally, survey results showed that the PAHs benefited from acquiring more land than they had before the Project. Out of the 48% who used their compensation to buy land, 54% purchased more acres than they previously owned, 8% bought the same amount, and 38% acquired less land. The results further indicated that 53% of these households purchased land in a different village, while 47% bought in the same village as they had before. Kyankwanzi had the highest number of PAHs purchasing land in different villages, whereas Kyotera, Hoima, and Lwengo had more PAHs who bought land in their original villages. The RAP implementation encouraged PAPs to identify and purchase replacement land in the same village or, at least, in the same subcounty, so that affected communities could maintain their social connections.

Figure 16: Proportion of the Surveyed PAHs that used monetary compensation to replace land (n = 307)



Source: GMT RAP Implementation Audit PAH Survey, 2024

**Corrective Actions**

None required

## Compliance Level

The Project is compliant with supporting physically displaced PAPs (with insufficient residual land or alternative land) in the purchase of replacement land for the construction of replacement housing and supporting livelihoods.

## Recommended Areas of Improvement

None required

### 5.10 Replacement Housing and Tenure Security

#### Compliance Requirements

IFC PS5 para 20 requires that physically displaced persons to be offered feasible resettlement options including adequate replacement housing with security of tenure<sup>28</sup> at resettlement sites or monetary compensation where appropriate in addition to relocation assistance. The standard also requires that resettlement sites should offer improved living conditions. PS5 Para 21 also requires that the offered replacement property should be of equal or higher value with security of tenure.

#### Key observations and findings

Based on the above compliance requirements, this audit area was assessed based on the following key elements:

- Provision of adequate replacement housing to physically displaced PAPs
- Security of Tenure for replacement house land.

The Project RAP identified 195 (comprising 34 female-headed households and 161 male-headed households) physically displaced (PD) PAPs of whom 175 (89.7%) opted for replacement houses. Based on the Project Implementation Summary dated 28 October 2024, all 177<sup>29</sup> replacement houses had been built and occupied by the beneficiary PAPs.

The Project encouraged in-community resettlement, where PD PAPs who opted for replacement house selected the location of their replacement house in the same village, subject to replacement land availability or another village within the same subcounty. Therefore, PAPs continued accessing their pre-existing social services and social networks before the Project. Out of 175 PD PAPs who opted for replacement house, 139 had sufficient residual land or owned existing alternative land onto which the replacement house was constructed. The remaining 36 PD PAPs received EACOP support to purchase replacement house land (a minimum of 0.3 acres).

Depending on the size of the affected house, PAPs received either a Type 1 replacement house (41 square metres), Type 2 replacement house (49 square metres), or Type 3 replacement house (54 square metres). The replacement house package included a house with a solar power source, a water tank, an outside kitchen, and a ventilated improved pit (VIP) latrine.

As already discussed in section 5.9 above, EACOP supported 36 physically displaced PAPs, whose residual or alternative land was inadequate, with the purchase of replacement house land (minimum 0.3 acres). The EACOP support included undertaking due diligence on the suitability of the identified land for a replacement house, survey and preparation of

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<sup>28</sup> Security of tenure means that resettled individuals or communities are resettled to a site they can legally occupy and are protected from the risk of eviction.

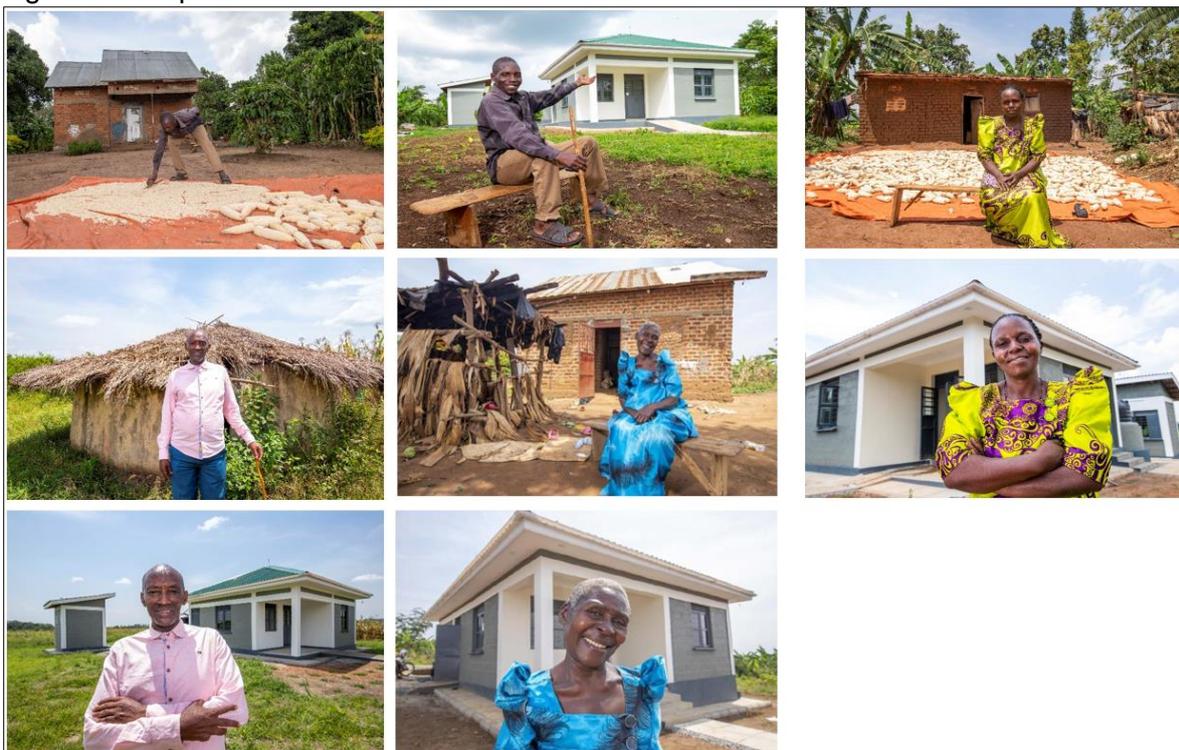
<sup>29</sup> 2 of the 175 physically displaced PAPs had 2 replacement houses constructed because they had two separate households affected

survey drawing confirming the land size, preparation of a tripartite land purchase agreement between the vendor, PAP, and EACOP, and paying the purchase price (which included the statutory compensation value for the affected land) on behalf of the PAP.

A tripartite land purchase agreement for the replacement house land was executed—between the vendor, beneficiary PAP, and EACOP—and is available evidence of security of tenure, though in cases of Kibanja or customary replacement house land, this security of tenure requires more strengthening.

The audit survey established that 90% (or 53 PAHs) of the surveyed PAHs who received replacement houses (n=59) reported that their houses were very good compared with the ones that were affected by the Project. Figure 17 below shows some of the affected houses and the replaced houses for PAPs.

Figure 17: Replacement Houses – PAP’s houses before & after



Source: EACOP Uganda (28 October 2024)

The 15 PD PAPs chose the monetary compensation option for various reasons, including a lack of trust in the Project to deliver a replacement house on time, given previous experience with government-led resettlements, where replacement house construction takes a long period to complete. During the audit KII with one of the PD PAPs that opted for monetary compensation, one of the findings was that some of them wanted to use their compensation to construct commercial buildings (instead of residential houses) for income generation in the form of rental income and establishment of business.

The remaining 5 PD PAPs within the Taala Central Forest Reserve (CFR) (a designated protected area in Kyankwanzi District) were not eligible for replacement housing and relocation support (reflecting their informal occupancy with no formal land rights according to the national law), but monetary compensation for their affected houses and other assets was provided by EACOP. As per the RAP commitment, the Project is committed to supporting these PAPs in accessing secure alternative land where they can resettle without the risk of eviction. During the audit KII, EACOP committed to purchase one (1) acre of land for each of the five (5) Taala physically displaced PAPs, and the process has since commenced to ensure their security of tenure. These PAPs also received monetary

compensation for their affected houses, transitional support, and livelihood restoration support packages, including 12-month food baskets.

During the audit site visit to 2 of the 5 PD PAPs, it was established that these PAPs used monetary compensation to purchase land with uncertain tenure and was inadequate to sustain their livelihood activities. They reported having planted starter-pack seeds in the Taala Central Reserve, where they rent land at UGX 350,000 – 400,000 per acre from NFA-licensed tree farmers.

In alignment with IFC PS5 and through the audit KIIs with PAU, MEMD, and CGV, it was recommended that EACOP processes Certificate of Occupancy (in case of replacement houses on Kibanja land) or Freehold Certificates of Title (in case of replacement houses on customary land) to guarantee tenure security for all replacement housing sites without existing certificates of title.

Based on audit site visits/observations, no support was extended to Taala Central Forest Reserve PDPs that required assistance in accessing secure alternative land with security of tenure, in accordance with the Project RAP commitment. EACOP has since commenced activities to purchase secure alternative land for these PAPs.

### **Corrective Actions**

- Process Certificate of Occupancy (in case of replacement houses on Kibanja land) or Freehold Certificates of Title (in case of replacement houses on customary land) for PAPs to guarantee tenure security of replacement houses
- Expedite support for the five (5) former Taala Central Forest Reserve physically displaced PAPs in purchasing land where they can relocate without the risk of eviction in accordance with the Project RAP commitment.

### **Compliance Level**

Based on the above findings and areas of improvement, the Project is:

- Compliant with the provision of adequate replacement housing to eligible physically displaced PAPs
- Partially Compliant with Tenure security for replacement house land that is presently held on Kibanja or customary tenure, and tenure security for former Taala Central Forest Reserve PD PAPs.

### **Recommended Areas of Improvement**

None required

## **5.11 Restoration or improvement of affected communal property**

### **Compliance Requirements**

IFC PS 5 requires the avoidance or minimisation of impacts, or the restoration or improvement of communal access to land or the use of other resources, including communal property and natural resources such as marine and aquatic resources, freshwater, among others.

### **Key observations and findings**

The compliance of this audit area was assessed by considering the following key elements about the affected communal water sources as communal property:

- Efforts by the Project to avoid or minimise impacts on affected communal property
- Restoration or improvement of affected communal property.

The Project RAP (in Chapter 6) states that a total of 29 water sources, including valley tanks, boreholes, and protected and unprotected spring wells, were affected by the Project.

Based on a review of additional documents provided by EACOP, it was established that 15 of the water sources were communally used, comprising of 3 community-owned and 12 privately owned. An example of affected communal water sources is shown in Figure 18 below. EACOP has committed to in-kind replacement of affected communal water sources, as well as the former privately-owned water sources that served the community, as part of the company's social investment strategy.

Figure 18: Affected Communal Water Sources



Protected spring well in PPL RoW, Kijumba Village, Hoima District



Nyakabaale Kyarwaheeru Community well in the PPL RoW, Mukabara Village, Kikuube District

Source: GMT RAP Implementation Audit Field Visit, 2024

The communities owning the three (3) water sources signed Compensation Agreements for in-kind replacement by EACOP. Additionally, compensation agreements for the 12 privately owned water sources were signed by the individual PAPs, who received monetary compensation and were replaced through EACOP's social investment program.

At the time of the audit, EACOP reported that eight (8) boreholes were completed (see example in Figure 19 below), with seven (7) water sources pending replacement. In addition, EACOP supported the establishment and training of Water Management Committees for these communal water resources.

During the audit, KIIs with community leaders and FGDs with PAPs confirmed that EACOP sought to avoid or minimise impacts on communal water sources, and the Project committed to restoring or replacing affected communal water sources that could not be avoided.

Figure 19: Some of the communally used water sources constructed by EACOP



Source: EACOP Uganda, 28 October 2024

### Corrective Actions

None required

### Compliance Level

Based on the above findings and areas of improvement, the Project is:

- Compliant with efforts to avoid or minimise impacts on communal water sources
- Compliant with the restoration or replacement of affected communally used water sources.

### Recommended Areas of Improvement

EACOP expedites the replacement of pending communally used water sources

## 5.12 Management of Cultural and Heritage Sites

### Compliance Requirements

IFC PS8 para 1 recognises the importance of cultural heritage for current and future generations. It requires that project proponents protect cultural heritage in the course of their project activities. The standard further requires a complete identification of such cultural heritage in consultation with the affected communities and the preparation of a chance finds procedure to manage chance finds<sup>30</sup>.

<sup>30</sup> Tangible cultural heritage encountered unexpectedly during project construction or operation.

Furthermore, PS8 para 11 requires that where the project proponent has encountered tangible cultural heritage that is replicable and not critical, the project will apply mitigation measures that favor avoidance, minimization of impacts, or restoration.

The Uganda Ministry of Health guidelines under the Public Health Act Cap 281 require the exhumation and relocation to be undertaken by professional undertakers and in line with religious and cultural beliefs of the affected families as well as public health requirements.

### **Key observations and findings**

Key compliance elements assessed in this audit area are:

- Identification of cultural heritage property
- Exhumation and relocation of identified cultural heritage property in accordance with established procedures.

The Project identified 668 graves and 29 shrines as the cultural heritage in the Project footprint in consultation with affected families and relatives, and all these have all been relocated according to the Project implementation summary dated 28 October 2024. The affected persons who owned these graves and shrines received monetary compensation in addition to the relocation of shrines and graves. EACOP also supported the affected families by paying for grave reburial ceremonies and ceremonies for the relocation of shrines.

The Project also identified archaeological finds such as half pots, arrowhead, cow skull, and archaeological pots on Pumping Station (PS) - 02 & Main Camp & Pipe Yards (MCPY) -04, which have been appropriately managed.

During audit site visits and KIIs with PAPs that had affected graves, it was observed that the grave relocation exercise was undertaken in compliance with the Ministry of Health guidelines and the EACOP graves relocation procedure, while respecting the religious and cultural practices of affected persons.

All PAPs who had affected graves visited during the audit were satisfied with the relocation procedures and the process followed.

The Project also has an active Chance Finds procedure that guides in case of chance finds.

### **Corrective Actions**

None required

### **Compliance Level**

Based on the above findings and areas of improvement, the Project is:

- Compliant with the identification of cultural heritage property
- Compliant with exhumation and relocation of cultural heritage property in accordance with the Ministry of Health guidelines and established Chance Find procedures.

### **Recommended Areas of Improvement**

None required

## 5.13 Issuance of Notices to Vacate (NTV) and Avoidance of Forced Eviction

### Compliance Requirements

The IFC PS 5 para 3 & 9 requires project proponents to avoid forced evictions and only take possession of acquired land and related assets after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation.

In addition, Article 26(2) of the Constitution of the Republic of Uganda includes a requirement for prompt payment of fair and adequate compensation, prior to taking possession or acquiring the property.

### Key observations and findings

This audit area assessed compliance with:

- Issuance of NTVs after compensation
- Avoidance of forced eviction.

According to the Project Implementation Summary dated 28 October 2024, EACOP had issued a total of 3,457 NTVs to paid PAPs as shown in Table 18 below.

Table 18: Summary on NTV issuance as at 28 October 2024

Description	Number	%age
PAs and PPL RoW PAPs	3,660	100.0%
Signed Compensation Agreements	3,627	99.0%
Compensation Payments Paid	3,567	97.0%
NTVs issued	3,457	94.0%
NTVs expired	3,414	93.0%

Source: EACOP Uganda (28 October 2024)

During audit surveys and key informant interviews, stakeholders and PAPs reported that NTVs were issued only after they received their compensation packages. According to document reviews, 94% of the PAPs were issued NTVs, out of which 93% expired by 28 October 2024. The audit survey results established that 94% of the sampled PAHs confirmed receiving NTVs, which occurred only after they received compensation (see Figure 20 below).

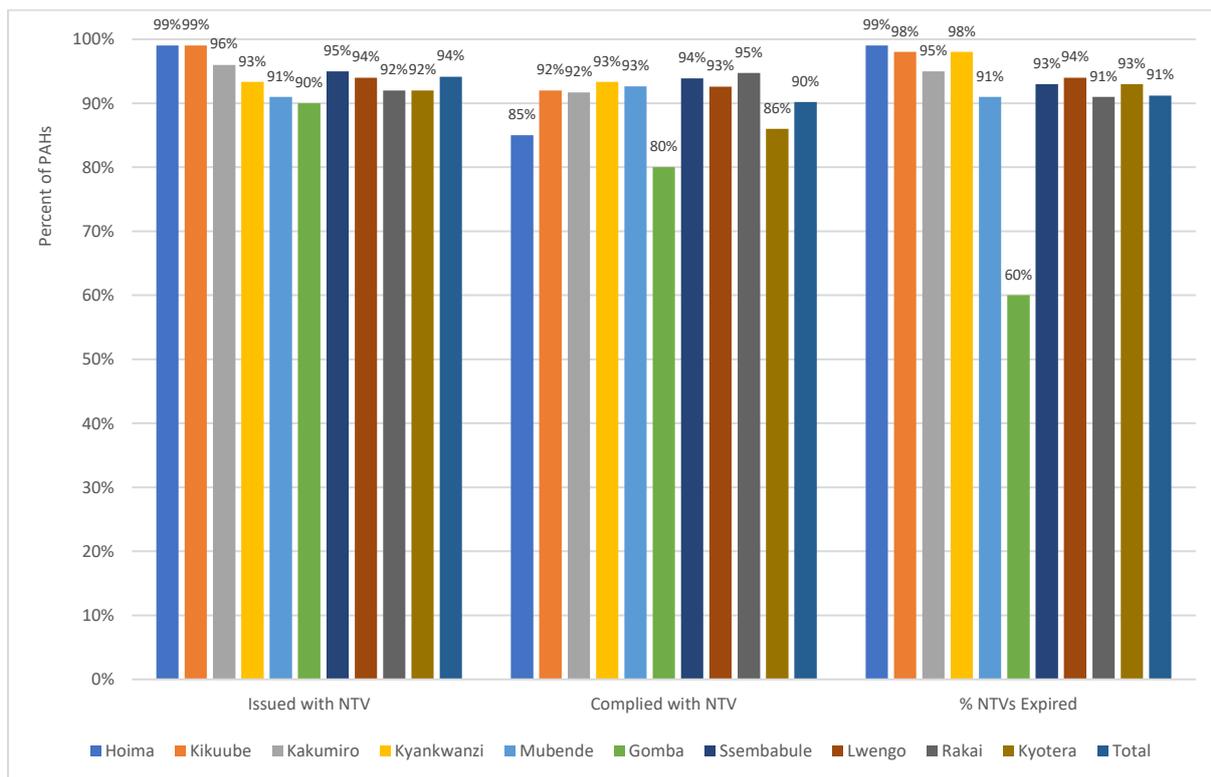
During the audit site visits, it was noted that all compensated PAPs who had buildings or other structures in the Project footprint demolished and salvaged their materials.

Despite some PAPs noting that their NTVs had expired, it was observed during the audit site visits and observations that PAPs on the PPL continued to use their already compensated land parcels for seasonal crop cultivation. They reported that they would stop seasonal crop growing when EACOP finally notifies them about the commencement of pipeline construction.

The audit survey results indicate that 90% of recipients have complied with the NTVs requirements of demolishing structures and salvaging affected assets, and they relocated from the land parcels within the acquired Project footprint without being forcibly evicted.

No PAP reported that they had been evicted from their land by EACOP, including those with expired NTVs.

Figure 20: Proportion of the Surveyed PAHs issued with NTVs as at 28 October 2024



Source: EACOP Uganda (28 October 2024) & GMT RAP Implementation Audit PAH Survey, 2024

**Corrective Actions**

None required

**Compliance Level**

The Project is Compliant as the audit established that there were no cases of forced eviction, and NTVs were only issued once PAPs had received compensation.

**Recommended Areas of Improvement**

None required

**5.14 Project Land Titling and Transfer**

**Compliance Requirements**

IFC PS5 para 9 requires the project proponent to only take possession after compensation for the land. In addition, Article 26(2) of the Constitution of the Republic of Uganda includes a requirement for prompt payment of fair and adequate compensation, prior to taking possession or acquiring the property.

Section 11 of the East African Crude Oil Pipeline (EACOP) Act (Special Provisions) Act, 2021 provides that the EACOP project constitutes public works within the meaning of Section 1 of the Land Act and that the Uganda Land Commission shall grant land rights to enable the Project company to undertake all Project activities.

## Key observations and findings

In compliance with the above requirements, EACOP is surveying and subdividing off the acquired Project land in the names of the Government of Uganda (represented by Uganda Land Commission) and returning residual titles to PAPs.

For all compensated sections of the PPL RoW and PAs, the Project has made significant progress in subdividing, titling, and/or transferring the acquired land. As of 28 October 2024, the Project had processed 346 leasehold titles in the names of EACOP for 226 out of 294 kilometres (or 76.3%) of the PPL RoW only after payment of compensation. The lessor is the Uganda Land Commission (ULC) in accordance with the Project Host Government Agreement (HGA) and Article 239 of the Constitution of the Republic of Uganda, which mandates ULC to hold and manage any land in Uganda vested in or acquired by GoU in accordance with the provisions of the Constitution.

Progress with subdivision and titling of the acquired land from PAPs to GoU has been affected by:

- Delays at the Ministry Zonal Offices (MZOs) and the upgrade of the National Land Information System (NLIS)
- Technical challenges at Mityana and Masaka MZOs, like cadastral data inconsistencies and the need for block closures in NLIS.

The pending cases of monetary compensation, including Escrow cases, imply that the Project cannot yet achieve 100% titling for the Project land.

## Corrective Actions

None required

## Compliance Level

The Project is compliant as the Project land is only surveyed, mutated, and titled only after compensation payment.

## Recommended Areas of Improvement

None required

## 5.15 Governance, including human and financial resources

### Compliance Requirements

IFC PS1 para 17 requires the project proponent to establish, maintain, and strengthen, as necessary, an organisational structure that defines roles, responsibilities, and authority to implement the environmental and social performance of the project proponent. In addition, sufficient human and financial resources should be provided on an ongoing basis to achieve effective environmental and social performance.

Section 14.2 of the Project RAP Report also identified a number of stakeholders and actors with clear roles and responsibilities in the implementation of the Project RAP.

### Key observations and findings

In addition to collaboration with contractors for RAP preparation and implementation, Replacement Houses construction, LR Implementation, Graves Relocation, Shrines Relocation, Psychosocial Support, Replacement or Restoration of Communal Water Sources, EACOP has a robust internal team under the Land and Social Department headed by a Manager that has been able to achieve the registered progress of 97% compensation

payment of PAPs, completion and delivery of replacement houses, and the current ongoing implementation of LR programs.

The audit finds that EACOP is a sufficiently structured organisation with competent human and financial resources to implement the RAP through to the construction phase, including corrective actions and unique case-specific needs.

EACOP possesses an adequate organisational structure, with sufficient human and financial resources, to plan and implement its environmental and social performance, as evidenced by the current overall progress of RAP implementation. Also covered are extensions of certain elements, such as planned social investments for the wider community in the Project areas of influence.

EACOP is also committed to undertaking the corrective actions identified in this Audit Report and the forthcoming livelihood restoration external monitoring and reviews, as well as the Expost-RAP implementation evaluation

### **Corrective Actions**

None required

### **Compliance Level**

Based on the current RAP implementation progress, the Project is Compliant, as EACOP has an adequate organisational structure, human and financial resources, to plan and implement the RAP.

### **Recommended Areas for Improvement**

None required

## 6. Compliance Corrective Action Plan

Following the audit findings in Section 5 above, GMT has extracted corrective actions, which are presented in the Compliance Corrective Action Plan (CAP) Table 19 below. The required corrective action activities are presented alongside applicable RAP Implementation Audit Area (AA), indicating the activity, deliverable (output) for verification, the responsible party, and time frame.

The EACOP Uganda RAP Implementation Compliance Corrective Action Plan (CAP) is designed to guide EACOP in ensuring compliance with the EACOP Project's RAP and IFC Performance Standards, as well as relevant Ugandan legislation. In practice, the CAP will be a living document, which may need to be amended and updated as the Project RAP & LRP Implementation progresses.

Table 19: EACOP Uganda RAP Implementation Corrective Action Plan (CAP)

CAP Item	Ref	Required Corrective Actions	Deliverable	Responsibility	Timing
AA10: Replacement Housing and Tenure Security					
1.	AA10.1	Process Certificate of Occupancy (in case of replacement houses on Kibanja land) or Freehold Certificates of Title (in case of replacement houses on customary land) for PAPs to guarantee tenure security of replacement houses	Replacement House Land Tenure Security Report	EACOP	As soon as possible
2.	AA10.2	Expedite support for the five (5) former Taala Central Forest Reserve physically displaced PAPs in identifying land/plots where they can relocate without risk of eviction in accordance with the Project RAP commitment.	Secure Tenure Rights Report for Taala Forest Physically Displaced PAPs	EACOP	As soon as possible

## 7. Recommendations for Improvement

Following the audit findings in Section 5 and the compliance corrective action plan in Section 6 above, GMT suggests and recommends implementing activities in Table 20 below to improve on activities and practices that EACOP is undertaking beyond the compliance requirements across some specific audit areas.

Table 20: Recommended Areas for Improvement

Ref	Recommended Actions/Activities	Deliverable
<b>AA1: Stakeholder Participation and Disclosure</b>		
1.	During the remaining LR implementation activities, incorporate the views of PAPs on input delivery schedules in line with the seasonal calendar/planting windows.	Stakeholder Engagement Reports
<b>AA2: Compensation Determination</b>		
2.	Ensure continued clear communication with PAPs, especially regarding the pending valuation of unviable residual land.	Stakeholder Engagement Reports
<b>AA4: Vulnerable Persons Assistance</b>		
3.	Offer a third training in Financial Literacy, Money Management, Family strengthening, and gender to mitigate any emerging risks of gender based violence.	Financial Literacy, Money Management, and Family Strengthening Report
4.	Undertake ongoing internal monitoring of vulnerable persons for potential need of additional LRP packages.	Internal Monitoring Reports
<b>AA5: Delivery of Transitional Support</b>		
5.	Undertake additional stakeholder engagements with PAPs on eligibility criteria for food baskets, especially for those remaining PAPs yet to be enrolled.	Stakeholder Engagement Reports
<b>AA6: Livelihood Restoration and Improvement</b>		
6.	Undertake additional stakeholder engagements with PAPs who have inadequate information on eligibility criteria for the different LRP packages and ensure all enlisted PAPs are covered during (additional) package selection.	Stakeholder Engagement Reports
7.	Provide an additional round of LR support to PAPs who got low crop yields. Engage timely with the relevant stakeholders to avoid or mitigate delays so that crop calendars are respected.	LRP Implementation Report
8.	Expedite the enrolment of the remaining 462 eligible PAPs for LR activities.	LRP Implementation Report
9.	Continue cooperation with demonstration sites, especially since they are still needed to train PAHs yet to be enrolled on LR programs.	LRP Implementation Report
<b>AA7: Community Cohesion and Social Disarticulation</b>		
10.	Give priority to further implementation of the EACOP Social and Environmental Investment Strategy at the community level through additional livelihood improvement activities.	LRP Implementation Report for the PACs
11.	Continue to sensitize affected communities about non-PAPs being able to access EACOP LR agricultural training.	Stakeholder Engagement Reports
<b>AA8: Implementation of Grievance Management Mechanism</b>		
12.	EACOP already provides ongoing communication to PAPs and other stakeholders on the grievance mechanism. It is essential to continue these communications for the remainder of the RAP implementation and construction.	Stakeholder Engagement Reports
<b>AA11: Restoration or improvement of affected communal property</b>		
13.	Expedite the replacement of pending communally used water sources	Affected Communally Used Water Sources Replacement Report

## 8. Annex : RAP Audit PAH Survey Questionnaire

### EACOP Uganda RAP Implementation Audit PAH Survey Questionnaire

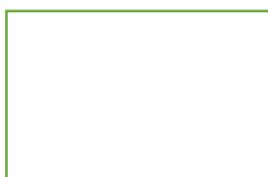
#### Introduction

Hello! My name is ..... I am a member of a consultancy team that is monitoring and evaluating of the Resettlement Action Plan activities that were/are being implemented by the East African Crude Oil Pipeline project (EACOP). As one of the persons affected by EACOP projects and activities in this locality, I would be grateful if you became part of this exercise by allowing me to ask you some questions for about 25 minutes. Information shared during this interview will be used exclusively for purposes of ascertaining the performance of the EACOP Project, and your identity will be treated with utmost confidentiality. Your identity will not be disclosed without your written consent. I ask you to be candid in answering the questions. Do you have any question for me?

Do I have your consent to proceed with the interview?

(1) Yes  (2) No  → END

I ..... hereby consent to participate in the interviews at my own freewill and without any coercion I consent for this interview to be recorded.



Thumb print

Date.....

Time .....

Name of Data Collection Officer

#	Question	Response
<b>1</b>	<b>Current Location</b>	
1.1	District	
1.2	Sub county	
1.3	Village	
1.4	GPS Location	
1.5	Name of PAP	State if PAP wishes to be anonymous and leave blank
1.6	PAP REF. No.	Yes No, I want to remain anonymous
1.7	Former location along the Project area	
<b>2</b>	<b>Stakeholder Participation and Disclosure</b>	
2.1	Were you appropriately informed (through disclosure of appropriate information on Resettlement Action Plan	1. Yes 2. No

#	Question	Response
	activities in a timely, understandable, accessible, and appropriate manner and format)?	
2.2	If No, what things would you like to have more information on?	<ol style="list-style-type: none"> <li>1. Food baskets</li> <li>2. Agricultural training and tools</li> <li>3. Vocational training</li> <li>4. Frequency of Livelihood Restoration Packages</li> <li>5. Other, please specify</li> </ol> Multiple response
2.3	Were you well-informed about your right to continue cultivating your land with seasonal crops until you are required to vacate the land?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No, please explain</li> </ol>
2.4	Were you explicitly informed on the available compensation assistance for PAPs (e.g. Letters of Administration, access to Third-Party legal advice)?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No, please explain</li> </ol>
2.5	Were you adequately and sufficiently consulted during the Resettlement Action Plan development and implementation process including on options and alternatives (on e.g. in-kind versus monetary compensation, livelihood development design)?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No, please explain</li> </ol>
2.6	How satisfied are you with the preparatory activities carried out to assess impacts and determine eligibility? (e.g., stakeholder engagements & consultations, awareness about the project, socio economic baseline surveys, cadastral survey process, valuation of affected property).	<ol style="list-style-type: none"> <li>1. Not satisfied</li> <li>2. Moderately satisfied</li> <li>3. Very satisfied</li> </ol> Explanation:
2.7	How satisfied are you with the incorporation of your perspectives into the assessment and determination of the Resettlement Action Plan activities?	<ol style="list-style-type: none"> <li>1. Not satisfied</li> <li>2. Moderately satisfied</li> <li>3. Very satisfied</li> </ol> Explanation:
2.8	Did you participate in information dissemination or consultations carried out by the Project to inform PAPs Resettlement Action Plan activities such as valuation, surveys, Entitlement Briefings, Agreements signing?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No, please explain:</li> </ol>
2.9	Were there any situations of corruption, extortion, or other unethical behavior?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> </ol> Explanation:
<b>3</b>	<b>Compensation Determination</b>	
3.1	Did you participate in the compensation field survey and valuation exercise?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No, please explain</li> </ol>
3.2	Did you understand the process of compensation determination and the role of the Chief Government Valuer and the District Land Boards?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> </ol>
3.3	Were your affected assets captured adequately?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No, please explain</li> </ol>
<b>4</b>	<b>Compensation Payment</b>	
4.1	What type of compensation did you receive?	<ol style="list-style-type: none"> <li>1. Monetary compensation</li> </ol>

#	Question	Response
		<ol style="list-style-type: none"> <li>2. Replacement Housing</li> <li>3. Replacement Land</li> <li>4. Others, specify</li> </ol> Multiple response
4.2	Was the compensation delivered prior to taking possession of the land or assets?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No, please explain:</li> </ol>
4.3	Is there any outstanding amount of compensation that you are yet to receive from the Project?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> </ol>
4.4	If yes, what are the reasons are for the delay in receiving the outstanding amount?	<ol style="list-style-type: none"> <li>1. No bank account</li> <li>2. No land title</li> <li>3. No national ID</li> <li>4. Pending disclosure of Residue land valuation</li> <li>5. I don't know</li> <li>6. Other reasons, please specify</li> </ol> Multiple responses
4.5	Have you received any other assistance from EACOP?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> </ol>
4.6	What kind of assistance was provided to you to enable receipt of monetary compensation?	<ol style="list-style-type: none"> <li>1. Letters of Administration</li> <li>2. Powers of Attorney,</li> <li>3. Statutory Declaration,</li> <li>4. Deed Polls</li> <li>5. NIRA Death Certificates</li> <li>6. National Identification Cards</li> <li>7. Bank Accounts Opening</li> <li>8. Processing certificates of title</li> <li>9. Other, please explain</li> </ol> Multiple Response
4.7	How did you use your monetary compensation?	<ol style="list-style-type: none"> <li>1. Bought land</li> <li>2. Paid fees</li> <li>3. Paid back loans</li> <li>4. Bought livestock</li> <li>5. House construction or renovation</li> <li>6. Farming</li> <li>7. Started a business</li> <li>8. The money is still in the bank account</li> <li>9. Bought food</li> <li>10. Bought a motorcycle</li> <li>11. Bought a bicycle</li> <li>12. Rented additional land</li> <li>13. Other, please explain</li> </ol>

#	Question	Response
4.8	If you bought livestock, what livestock did you buy?	1. Cattle 2. Goats 3. Sheep 4. Pigs 5. Poultry 6. Other, specify:
4.9	If you used your compensation to replace affected assets, were you with the paid monetary compensation able to acquire properties and assets of similar value?	1. Yes 2. No, please explain:
4.10	Were there any issues to the signing of compensation agreements (e.g. language barriers, illiterates unaware of the terms of agreements they signed, unethical behavior towards people that refused to sign, intimidation of PAPs)?	1. Yes, please explain 2. No
4.11	Did you use the monetary compensation to move to or to establish activities in wetlands or other environmentally protected areas?	1. Yes, please explain: 2. No
<b>5</b>	<b>Replacement Land Acquisition and Processes</b>	
5.1	Did you use the monetary compensation to purchase any replacement land?	1. Yes, 2. No, please explain
5.2	If Yes, how much land did you purchase in comparison to what you had before? (acres)	1. Less acres 2. Same number of acres 3. More acres
5.3	If Yes, where is the land that you purchased located?	1. Same village 2. Different village
5.4	If Yes, is the total land that you now have (including any other land parcels NOT affected by EACOP) sufficient to meet your household livelihood purposes??	1. Yes 2. No, please explain
<b>6</b>	<b>Livelihood Restoration and Improvement (its effectiveness)</b>	
6.1	Did you receive any Livelihood Restoration Support?	1. Yes 2. No
6.2	Did you receive any Financial Literacy Training	1. Yes 2. No
6.3	If Yes, did you find it helpful?	1. Yes 2. No Explanation:
6.4	Did you receive any other Livelihoods Restoration training?	1. Yes 2. No
6.5	If Yes, which training(s) did you receive?	1. Vegetable growing 2. Crop growing 3. Marketing 4. Livestock rearing 5. Making animal products 6. Household business 7. Entrepreneurship 8. Wage-paid job 9. Building construction 10. Welding

#	Question	Response
		11. Tailoring Multiple response
6.6	If you followed a training, how have you put the new skills you learnt into practice?	1. Replicated planting in lines 2. Replicated correct spacing 3. Replicated weed control 4. Raised seedlings for sale 5. Harvesting 6. Taught fellow farmers 7. Yoghurt making 8. Milk preservation 9. Building construction 10. Welding 11. Tailoring 12. Motorcycle repair 13. Got wage-paid job 14. Not put to practice yet 15. Other, please specify Multiple response
6.7	If you utilized new skills, did it help to improve the quality of your life and livelihoods?	1. Yes 2. No
6.8	Are enrollment processes for livelihood restoration packages fair for all categories of affected persons including women, vulnerable people?	1. Yes 2. No Explanation:
6.9	Are you satisfied with the livelihood restoration activities carried out by the Project to ensure that you are able to restore your livelihoods?	1. Not satisfied 2. Moderately satisfied 3. Very satisfied
6.10	How has the Project contributed to your living standards?	1. Worse than before 2. Same as before/restored 3. Improved / better than before Explanation:
6.11	Which household levels were improved by the Livelihood Restoration Programs?	1. Possession of household items 2. Reduced indebtedness 3. Increased monetary income 4. Increased non-monetary income 5. Improved nutrition 6. Improved health 7. Nothing improved Multiple response
6.12	If your income has increased, through what?	1. Sale of crops

#	Question	Response
		<ol style="list-style-type: none"> <li>2. Sale of animal products</li> <li>3. Sale of animals</li> <li>4. Household business</li> <li>5. Wage-paid job</li> <li>6. Other, please specify:</li> </ol>
6.13	Are you having enough food to meet your household needs in the last 6 months?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> </ol>
6.14	If you were not food secure, what were the reasons for not having enough food?	<ol style="list-style-type: none"> <li>1. Poor harvest</li> <li>2. Lack of access to land</li> <li>3. Bad seasonal weather</li> <li>4. Sold all the produce</li> <li>5. Other, please explain</li> </ol> <p>Multiple response</p>
6.15	Has the quantity of the household produce increased in the last six months?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> <li>3. No change</li> </ol>
6.16	If Yes, what increased?	<ol style="list-style-type: none"> <li>1. Maize</li> <li>2. Beans</li> <li>3. Cassava</li> <li>4. Coffee</li> <li>5. Milk</li> <li>6. Meat</li> <li>7. Crafts</li> <li>8. Services</li> <li>9. Other, specify:</li> </ol> <p>Multiple response</p>
6.17	Did you add any other livelihoods to your current livelihoods?	<ol style="list-style-type: none"> <li>1. Yes</li> <li>2. No</li> </ol>
6.18	If Yes, what new livelihood sources did you add?	<ol style="list-style-type: none"> <li>1. Maize</li> <li>2. Beans</li> <li>3. Cassava</li> <li>4. Coffee</li> <li>5. Goats</li> <li>6. Chickens</li> <li>7. Pigs</li> <li>8. Wage-paid job</li> <li>9. Other, specify:</li> </ol> <p>Multiple response</p>
6.19	How have the Livelihood Restoration Programs improved household's relationship between family members?	<ol style="list-style-type: none"> <li>1. Worse than before</li> <li>2. Same as before</li> <li>3. Improved / better than before</li> <li>4. It initially improved but now it is same as before</li> </ol> <p>Explanation:</p>

#	Question	Response
6.20	How have the Livelihood Restoration Programs improved your relationship with the none affected neighbors?	1. Worse than before 2. Same as before 3. Improved / better than before Explanation:
6.21	What kind of additional livelihood restoration packages are necessary in your view?	1. Cattle rearing 2. Poultry rearing 3. Goat rearing 4. Piggery 5. Beekeeping 6. Fish farming 7. Other, please explain Multiple response
6.22	Was assistance provided by the Project to allow continued access or to secure access to alternative equivalent livelihood earning opportunities and land?	1. Yes 2. No Explanation:
6.23	Did you use the Livelihood Restoration support to establish activities in wetlands or other environmentally protected areas?	1. Yes, please explain: 2. No
<b>7</b>	<b>Implementation of Grievance Management Mechanisms</b>	
7.1	Are you aware of the existence of the Grievance Management procedure for the Project	1. Yes 2. No
7.2	Are you satisfied with the Grievances handling mechanism established for the Project? (i.e. related to effectiveness and efficiency of resolving issues/addressing concerns)	1. Not satisfied 2. Moderately satisfied 3. Very satisfied Explanation:
7.3	Was your grievance satisfactorily closed?	1. I never raised a grievance 2. Yes 3. No Explanation:
<b>8</b>	<b>Replacement Housing and Tenure Security</b>	
8.1	Were you physically displaced by the Project?	1. Yes 2. No
8.2	If Yes, did you receive a replacement house?	1. Yes 2. No, please explain
8.3	If Yes, did you have sufficient existing land for replacement house?	1. Yes 2. No
8.4	If No, were you assisted by EACOP in obtaining suitable land for your replacement house?	1. Yes 2. No
8.5	Were you involved in the construction process?	1. Yes 2. No Explanation:
8.6	Did you appreciate the design of the house?	1. Yes 2. No Explanation:
8.7	Were you helped to understand the expected quality of materials (cement, aggregates, sand, doors, windows, paint etc.) the mixes as per the specifications?	1. Yes 2. No Explanation:
8.8	Are you satisfied with the replacement house?	1. Yes

#	Question	Response
		2. No Explanation:
8.9	Did you receive any relocation assistance?	1. Yes 2. No 3. I didn't need it
8.10	If Yes, were you satisfied with the kind of relocation assistance you received?	1. Yes 2. No Explanation:
8.11	How do you compare your previous house with the replacement house?	1. Very poor 2. Poor 3. Good 4. Very Good Explanation:
8.12	Will you be able to maintain the new house in the condition without extra burden/pressure?	1. Yes 2. No Explanation:
8.13	What about the new location in view of access to social services (such as health facilities, schools, access roads, water, places of worship, etc.)?	1. Very poor 2. Poor 3. Good 4. Very Good 5. None required Explanation:
8.14	What about the new location in view of access to social networks and relatives?	1. Very poor 2. Poor 3. Good 4. Very Good 5. None required Explanation:
8.15	Do you currently have land documents?	1. Title certificate 2. Purchase agreement 3. Landlord consent 4. No, please explain Multiple response
<b>9</b>	<b>Vulnerable Persons Assistance</b>	
9.1	Did you have any of the following vulnerabilities prior to the Project?	1. None required 2. 65 years and above 3. Female Headed 4. Chronically sick 5. a person below 18 years 6. Disabled person Multiple response
9.2	Are you satisfied with the Vulnerable Support Programs carried out by the Project to ensure that you are able to offset the impacts?	1. Not satisfied 2. Moderately satisfied 3. Very satisfied 4. None required Explanation:
9.3	Are there any barriers that are stopping you to achieve successful outcomes from Vulnerable Support Programs?	1. Yes, please explain: 2. No 3. None required
9.4	Were there any barriers that are stopping you from engaging in consultations and accessing information during	1. Yes, please explain: 2. No

#	Question	Response
	the Resettlement Action Plan development and implementation process?	3. None required
9.5	How satisfied are you with the incorporating of your perspectives into the assessment and determination of the Resettlement Action Plan activities?	1. Not satisfied 2. Moderately satisfied 3. Very satisfied Explanation:
9.6	For physically displaced vulnerable PAPs, how is the access for you to social support networks?	1. Worse than before 2. Same as before 3. Improved / better than before Explanation:
9.7	For physically displaced vulnerable PAPs, do you experience changes after you have been displaced?	1. Yes, please explain: 2. No 3. None required
9.8	Did you receive support from the Project in the opening of bank accounts and accessing documents such as land agreements and Local Council letters?	1. Yes, please explain: 2. No 3. None required
9.9	Were documentation of ownership or occupancy and compensation agreements and bank accounts issued in the names of both spouses?	1. Yes, please explain: 2. No 3. None required
9.10	Were there any gender issues associated with the delivery of compensation? (e.g. access, control and decision making over monetary compensation and risks of gender-based violence and socio-economic suffering of women and children where compensation payment has been delivered to the husband)	1. Yes, please explain: 2. No Explanation
<b>10</b>	<b>Issuance of Notices to Vacate (NTV)</b>	
10.1	Was the NTV served after you received compensation?	1. Yes 2. No, please explain
10.2	Did you comply with the NTV?	1. Yes 2. No
10.3	Have you relocated yet from your land portion affected by EACOP?	1. Yes 2. No, please explain
10.4	If Yes, were you forcibly evicted?	1. Yes 2. No
10.5	Are you still using the land portion in the EACOP for seasonal cropping or livestock rearing?	1. Yes 2. No
<b>11</b>	<b>Project Land Titling and transfer</b>	
11.1	If you previously held a land title for your affected land, did you receive residue land titles?	1. I was not entitled 2. Yes 3. No
<b>12</b>	<b>Project Perception</b>	
12.1	What is your view on the East African Crude Oil Project (EACOP) in Uganda?	1. Positive 2. Negative