

Gender, Social and Regulatory Impact Assessment Report

for the Mining Sector Legal and Regulatory
Review Processes

FINAL REPORT

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EXECUTIVE SUMMARY

Government of Uganda is conducting a comprehensive review of the mining legal and regulatory framework. Under this process, a Guide to Good regulation document on Policy Development which calls for mandatory Regulatory Impact Assessment has been adopted by Government of Uganda. Ecological Christian Organization (ECO) and Ministry of Energy and Mineral Development (MEMD) with support from Democratic Governance Facility (DGF), have commissioned this regulatory impact assessment to ensure that policy solutions proposed by the state address a maximum of economic, environmental and social issues whilst causing a minimum burden on all stakeholders.

The assessment was conducted between September and October 2018 and involved extensive desk-based research and an 11-day field study in Uganda in which the project team visited mine sites, mineral exploration operations and met with numerous stakeholders from government, civil society, mining communities and the private sector. The assessment concludes with this report.

The following are among the major strengths of Uganda's mining legal and regulatory framework;

- (a) The Environmental Impact Assessment (EIA) Regulation emphasizes public participation in Environmental Impact Studies, with detailed communication procedures and targeted outreach to project affected communities. The EIA Regulation also requires consideration and assessment of both environmental and social factors.
- (b) Applications for either an exploration license or mining lease are scrutinized for commitment to employ and train Ugandan citizens, and provisions to procure a satisfactory level of readily available goods and services in Uganda.
- (c) Government revenues are mainly generated through a diverse range of taxes, fees and competitive royalties. Royalties are shared between stakeholders (i.e. central government, local governments and land owners).
- (d) The Mining Act requires an Environmental Restoration Plan to ensure the previous land uses and productivity prior to exploration or mining are achieved, a detailed timetable, and the proposed uses for the land following restoration.
- (e) The provision of location licenses for small-scale mining operations reserved for Ugandan citizens or companies where Ugandans hold majority shares is an indicator of the desire and strategy to formalize and accommodate Artisanal and Small-Scale Mining (ASM) operations in the national mining policies and legislation.

The following major weaknesses were identified:

- a) To an extent, a supportive legal and regulatory framework exists but there is limited capacity, resources and personnel for monitoring, inspections and enforcement of existing laws and regulations. This has strongly affected and weakened the legal and regulatory environment in the long term.
- b) The Mining Act and Regulations do not sufficiently address post mine closure, nor are all developers required to provide adequate financial assurance for mine closure.
- c) The EIA Regulation does not detail requirements for baseline descriptions of current conditions prior to issuing an exploration license or mining lease.
- d) There are salient claims royalty payments often do not reach landowners, and payment problems are compounded by the complex nature of land ownership. There is no system for local governments and land owners to know and verify how much is extracted and the core basis upon which royalty amount due is calculated. Revenue from mining generally does not translate into long-term social and economic development in communities located near mining or mineral exploration projects.
- e) There is no clear long-term strategy or funding to formalize ASM subsector, which remains informal and continues to be a source of conflict and lost revenue.

Several policy options have been considered and analyzed for applicability to the current legal and regulatory framework. These include:

- a) Do nothing or maintain the legal and regulatory framework in its current state;
- b) Strengthen legal and institutional environment by making specific amendments to the mining policies and laws;
- c) Repeal and replace existing legal, regulatory and institutional frameworks.
- d) Raise awareness among all concerned stakeholders through massive sensitization
- e) Strengthen coordination and institutional capacities
- f) Innovation of new actions or interventions
- g) Mainstream into existing policies, laws and regulations
- h) Enforce existing policies, laws or regulations

Of these, only following three policy options have been found applicable to the prevailing legal and regulatory environment.

- a) Do nothing or maintain the legal and regulatory framework in its current state;
- b) Strengthen legal and institutional environment by making specific amendments to the mining

policies and laws;

- c) Repeal and replace existing legal, regulatory and institutional frameworks.

The first two policy options have been observed to hinder the achievement of provisions enshrined in the new Mining and Minerals Policy, 2018 as well as the National Development Plan (NDP II) and Uganda's Vision 2040. As a result, the repeal and replace option is considered the most applicable and viable of the three options and provides opportunities to optimize benefits from mineral wealth, strengthen institutional capacity and mineral sector regulation for the benefit of all stakeholders.

In general terms, creation of employment, improved service delivery, investment opportunities, increased environmental protection, poverty eradication through national and household incomes and revenues ranks high are among the expected impacts. Additional impacts as described below are anticipated on the mineral sector stakeholders.

- a) **Small and Medium Enterprises (SMEs):** SMEs will harness more opportunities, acquire specialized skills and training, boost manufacturing industries (i.e. mineral processing) and attract more local content promotion (Buy Uganda Build Uganda Policy).
- b) **Local Government:** With a well-regulated mineral sector, Local Governments will harness more revenues, employment, and local infrastructure development.
- c) **Local communities:** Multiple benefits exist for local communities and these include: direct employment, indirect employment through trade and service provision, skills transfer and other benefits accruing from social corporate responsibilities of successful exploration and mining operations.
- d) **Agriculture Sector:** Access to locally manufactured and affordable agriculture inputs such as phosphate fertilizers alongside infrastructure development in the mineral rich areas shall transform lives of the majority of Ugandans who are still employed in the agriculture sector.
- e) **Manufacturing Sector:** Local value addition along the production and supply chain shall boost the local manufacturing sector and tap more local employment opportunities.
- f) **Civil Society Organizations (CSO) and the media;** CSOs and media participation and role in the mineral sector shall increase for purposes of accountability and transparency.

ACRONYMS

ACP: African Caribbean and Pacific.

ASM: Artisanal and Small-Scale Mining.

AU: African Union.

CDA: Community Development Agreement.

CSO: Civil Society Organizations.

DGF: Democratic Governance Facility

DGSM: Directorate of Geological Survey and Mines.

ECO: Ecological Christian Organization.

ESIA: Environmental and Social Impact Assessment.

EU: European Union.

GDP: Gross Domestic Product.

MEMD: Ministry of Energy and Mineral Development.

NDP: National Development Plan.

NEMA: National Environment Management Authority

RIA: Regulatory Impact Assessment.

SDGs: Sustainable Development Goals.

SMEs: Small and Medium Enterprises.

1 INTRODUCTION

Article 244 of the Constitution of the Republic of Uganda places ownership of all minerals and petroleum, in, on or under any land or water in Uganda in the Government that holds it in trust for and on behalf of all the people of Uganda. In addition, Article 79 (1) of the constitution effectively grants parliament authority to make laws on any matter for the peace, order development and good governance of Uganda. Therefore, as specified in Article 244 (2), parliament makes laws regulating the exploitation of minerals and sharing of royalties' from minerals among others. Furthermore, mining related activities have an impact on the environment and Article 245 empowers Parliament to make laws for the protection of the environment.

Therefore, the Constitution as the supreme law has clear provisions that address the mineral sector. The Mining and Mineral Policy 2018, Mining Act 2003 and Mining Regulations 2004 are designed to operationalize these provisions and guide the exploration, development and exploitation of mineral wealth in the interest of all Ugandans.

This Regulatory Impact Assessment (RIA) is to ensure that policy solutions proposed by the state in view of the Mining and Minerals Policy 2018 address a maximum of economic, environmental and social issues whilst causing a minimum burden on all stakeholders.

1.1 Background

The existence of mining in Uganda can be traced to the pre-colonial era. Therefore, development of a strong, vibrant and sustainable mineral sector is critical to Uganda's integrated development. The country's Vision 2040 appreciates the minerals sector potential in as far as transformation of the Ugandan economy from peasantry economy to middle income economy is concerned. The second National Development Plan (NDP II) has specifically identified minerals sector among priority investment areas to achieve Vision 2040.

In addition, the mineral subsector consists of linkages with other key sectors of the economy such as agriculture, energy, trade and manufacturing industry. This further highlights the sectors potential as a key driver of employment opportunities and GDP growth through such linkages and hence a source of revenue, employment, and economic lifeline industries. For Example Steel which is processed from iron ore is a significant input to the manufacturing, construction and infrastructure development. Uranium on the other hand is used to facilitate generation of electricity from nuclear energy; whereas Phosphates are used for producing fertilizers to support agriculture.

Mineral sector GDP contribution stands at 0.3% although projected to increase to over 3% with effective regulation (Baseline Assessment of Development Minerals in Uganda, 2018). As such, the sectors significant positive impact to national economy is still minimal and unlikely to meet the SDGs as well as aspirations of Uganda Vision 2040, and the NDP targets for the sector.

In addition, the mineral sector's legal and regulatory framework currently in force is considered outdated and needs to align with the provisions of Constitution, the Mining and Minerals Policy 2018, the National Development Plan (NDP), international agreements, emerging issues and best practices existing in other jurisdictions with mineral wealth.

The AU Agenda 2063 and the Africa Mining Vision 2009, further emphasize the importance of sustainable exploitation of mineral resources for the socio-economic development and transformation of member States. The proposed review of the legal, regulatory and institutional framework of the mining sector is therefore in line with other regional and continental initiatives that seek optimally exploit the continent's rich natural resources.

1.2 Policy Vision

A transformed mineral sector for socio-economic development of Uganda.

1.2.1 Policy Mission

To unlock and develop a sustainable, safe, secure socially and environmentally responsible mining industry to aid the socio economic development and transformation of Uganda. Ensure development of the mining industry through increased investment attractiveness, value addition, national participation and improved technology transfer and applications and institutional efficiency and effectiveness.

1.2.2 Policy Goal

The Overall goal is to develop the mining industry through increased investment, value addition, national participation and revenue generation to contribute significantly to socio-economic transformation and poverty eradication

1.2.3 Policy Objectives

The core objectives of the Mining and Mineral Policy 2018 are:

- i To strengthen the legal and regulatory framework for the development of the mineral sector.
- ii To ensure efficient, equitable, accountable and transparent management of mineral

revenues.

- iii To establish, manage and promote the country's mineral potential.
- iv To enhance and strengthen the institutional capacity for effective governance of the mineral sector.
- v To organize and legislate artisanal and small scale mining in Uganda.
- vi To promote and protect Health, Safety and Environment in the mineral industry.
- vii Provide a framework for gender mainstreaming, equity and human rights and eradication of child labor in the mineral industry.
- viii To provide a framework for marketing and value addition of minerals.
- ix To promote local content and national participation in the mineral industry and
- x To promote regional and international cooperation.

1.3 Scope of Work

- i. To develop a detailed and systematic RIA Framework that will be used to assess whether MEMD reviews in regulation is likely to achieve the desired objectives or not and further be premised on promoting accountability and transparency in regulatory decision making.
- ii. Producing a comprehensive situation analysis that will depict the current policy problems, identify the interested policy community and their specific interests /standpoints / perceptions about the identified policy options and choosing the most appreciate one for the country studied.
- iii. Identifying several policy options and analyzing their impact on various stakeholder groups.
- iv. Providing clear evidence on the effects the new legal and regulatory framework will produce for the beneficiaries (vulnerable groups), for the potential services providers (e.g. CSOs).

2 CONTEXT OF CURRENT LEGAL AND REGULATORY ENVIRONMENT

The Mining Act 2003 and Mining Regulations 2004 comprise the principle legal and regulatory environment guiding Mineral Sector development and management. However, the Mineral sector has undergone various transformation and changes over the years and as the result, the existing legal and regulatory environment has become inadequate in dealing with the developments in the sector as well as government strategic directions such as Vision 2040, NDP, international obligations and treaties, among others. This has collectively led to a number of challenges that include but is not limited to:

- ✚ Article 244 of the Constitution, 2005 as amended is not in tandem with the provisions in the Act to fully support regulation and development of the mineral sector;
- ✚ No clear regulation for commercial exploitation of substances such as sand, stone, clay and murram which are excluded from the definition of the word “mineral” in Article 244(5) of the Constitution. This has hindered revenue generation from this category of minerals which is crucial to attain the projected 3% mineral sector contribution to GDP and socio-economic development (Baseline Assessment of Development Minerals in Uganda, 2018);
- ✚ The existing legal and regulatory framework has created room for speculators in the sector. In addition, unrestricted and seemingly excessive powers granted to the Commissioner has often times resulted into unnecessary litigations;
- ✚ ASM remains unregulated and its contribution in the sector is never reflected in national statistics;
- ✚ Limited mineral value addition and beneficiation;
- ✚ No legal and regulatory provisions for responsible mineral sourcing of minerals such as Tin, Tungsten, Tantalite and Gold;
- ✚ Need to restructure the sector to address the insufficient human and financial resources which affects institutional capacity to administer the sector towards optimum resource exploration and development;
- ✚ Lack of clear guidelines on national participation and local content;
- ✚ Streamlining the co-existence of mining activities and other land uses;
- ✚ Lack of clear guidance to enforce health, safety and environmental practices.

To harness mineral sector full potential and socio economic benefits, it is important to consider regulation of all commercial substances excluded from the definition of a mineral, eliminate pervasive speculation, provide clear legal framework for ASM regulation, provide incentives for mineral value addition, align the sector to match with regional and international requirements,

enhance institutional capacity, provide a clear framework on national participation and local content, provide a robust, transparent, predictable and secure licensing regime, promote transparency and accountability, enforce health, safety and environmental concerns.

3 DEFINING POTENTIAL POLICY OPTIONS

In general, potential policy options to such mineral sector challenges may include:

- (a) Do nothing or maintain the legal and regulatory framework in its current state;
- (b) Strengthen legal and institutional environment by making specific amendments to the mining policies and laws;
- (c) Repeal and replace existing legal, regulatory and institutional frameworks.
- (d) Raise awareness among all concerned stakeholders through massive sensitization
- (e) Strengthen coordination and institutional capacities
- (f) Innovation of new actions or interventions
- (g) Mainstream into existing policies, laws and regulations
- (h) Enforce existing policies, laws or regulations

Upon analysis and review of the above policy options, the following are applicable to the current mineral sector context and challenges.

- (a) Do nothing or maintain the legal and regulatory framework in its current state;
- (b) Strengthen legal and institutional environment by making specific amendments to the mining policies and laws;
- (c) Repeal and replace existing legal, regulatory and institutional frameworks.

3.1 Strength and Risk Analysis of Potential Policy Options

| Policy Option | Strength | Risks | Conclusion |
|---|--|---|--|
| <p>Do nothing or maintain the legal and regulatory framework in its current state</p> | <p>A conservative option that preserves the legal and institutional arrangements in place. No extra costs over and above those prevailing.</p> | <p>In the longer term, this means that the sector continues to operate under outdated and prescriptive legislation which make it less competitive and unattractive to the global mining and business sphere. This would mean</p> <ul style="list-style-type: none"> ✚ Continued Unregulated exploitation of substances excluded from definition of minerals under Article 244(5) of the Constitution: The lack of regulation for commercial exploitation of substances such as sand, stone, clay and murrum, excluded from the definition of the word “mineral” in Article 244(5) of the Constitution, which affects revenue generation from this category of minerals to support socio-economic development; ✚ Pervasive speculation and increased litigation in the sector due to unclear guidelines and excessive powers for the Commissioner on grant of mineral rights. ✚ Size of licenses would continue to be huge and land ‘locked’ up to speculators without any work done. In this situation, companies can hold licenses for a long period of time with no tangible work to show on the ground. This further hinders opportunities for competitive allocation of mineral rights and prevents the country from harnessing serious investors. ✚ Low levels of mineral value addition and unregulated mineral processing and beneficiation plants. ✚ Lack of respect for human rights across the mineral value and beneficiation chain as well as protection and empowerment of the rights of women, vulnerable groups and children in mining communities. ✚ Increase in cases of mineral smuggling and underreporting of mineral production may flourish leading to revenue loss and denying | <p>Basing on the emerging issues and challenges already encountered while applying the current law, maintaining the status quo will not address the identified inadequacies and problems. Worse still it renders the approved Mining and Mineral Policy, 2018 redundant.</p> |

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| | | <p>Government and stakeholders due royalties for socio-economic development of the sector.</p> <ul style="list-style-type: none"> ✚ Inadequate local content and national participation in mining projects ✚ Social, environment, health and safety management issues: Mining (large and small scale) is broadly associated with environment, health, safety and social challenges such as: environmental degradation and its attendant effects on land and land use, chemical pollution (e.g. mercury poisoning, exposure to respiratory diseases). Environmental provisions to minimize pollution and poor mining practices remain weak. This would remain and get worse in ASM context due to its informality. ✚ Multiplication of unregulated informal ASM. The ASM characterized by its large, visible environmental impacts will remain a huge challenge to Government and stakeholders. ✚ Lack of independent verification of mineral production and certification of environmental and auditing reporting requirements could lead to loss of mineral revenue and environmental degradation. ✚ Weak penalties for non-compliance with the provisions in the Act and Regulations will remain. | |
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| Policy Option | Strength | Risks | Conclusion |
|---|--|---|--|
| <p>Strengthen legal and institutional environment by making specific amendments to the mining policies and laws</p> | <p>The Mining Act 2003 has been in force for the last 15 years and its performance has been tested. In addition, geoscientific data has been acquired for 80% of the country and new mineral targets identified. As a result, growing interest in the mineral sector has been registered. That notwithstanding, emerging trends in the global mining industry, the anticipated opportunities and challenges in the sector and other gaps in the Policy, Legal and Regulatory regime have rendered the current framework ineffective and obsolete and it requires an overhaul. There is therefore need for a comprehensive and robust policy, legal and regulatory framework to provide a clear guidance for sustainable mineral resources development.</p> | <p>Strengthening legal and regulatory framework in its current form may create some improvements in the mineral sector performance. Nevertheless, this too may carry forward challenges in the sector since Mining Act 2003 and Mining Regulations 2004 are aligned to an obsolete development agenda and constitutional provisions as well as unpredictable emerging social and economic contemporary developments.</p> <p>However if Government chooses to strengthen the current policies and legislations the following risks will remain:</p> <ul style="list-style-type: none"> ✚ Unregulated exploitation of substances excluded from definition of minerals under Article 244(5) of the Constitution: Amendment of Article 244 of the Constitution, 2005, which preceded the Mining Policy 2001, the Mining Act 2003 and the Mining Regulations 2004. As a result, all the frameworks are not in tandem to fully support regulation and development of the mining subsector; The lack of regulation for commercial exploitation of substances such as sand, stone, clay and murrum, excluded from the definition of the word “mineral” in Article 244(5) of the Constitution, has led to limited revenue generation from this category of minerals to support socio-economic development. These minerals if regulated can contribute over 3% to GDP (Baseline Assessment of Development Minerals in Uganda, 2018); ✚ The Implementation of the current mining legislation is fragmented across many legal instruments, with extensive amendments and exemptions provided over the years. The proposal remains constrained, as it requires harmonization and streamlining the mandates, policies | <p>This may slow down achievement of provisions enshrined in the new Mining and Minerals Policy, 2018 as well as the National Development Plan (NDP II) and Vision 2040.</p> |

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| | | <p>and legal frameworks of other key institutions Bill into the Mining and Mineral Bill. There are consequences of potential errors and additional costs due to the disparity between the existing policies, legal and Regulation legislative frameworks if the current framework is strengthened rather than a complete overhaul.</p> <ul style="list-style-type: none"> ✚ Strengthening current legal, regulatory and institutional environment deprives the mineral sector an opportunity to address critical new and emerging challenges such as separation of DGSM role of licensing from regulation, creation of new institutions to guide effective performance of the sector, regulation of other mineral substances excluded from the definition of minerals as well as opening investment channels in mineral processing, value addition and beneficiation etc. ✚ Spreading mining and minerals sector to other institutions may create confusion and extra costs to build capacity of such institutions for effective implementation of the mineral sector activities. | |
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| Policy Option | Strength | Risks | Conclusion |
|---|---|--|--|
| <p>Repeal and replace existing legal, regulatory and institutional frameworks</p> | <p>Government of Uganda approved the Mining and Minerals Policy for Uganda 2018, which stipulates a number of legal, regulatory and institutional reforms for the mineral sector. To effectively implement the policy provisions, a comprehensive review of the Mining Act 2003 and this can only be realized through repealing and replacing the Act.</p> <p>This option, therefore, creates an enabling environment to achieve the principles enshrined in the Mining and Minerals Policy, 2018 in a holistic manner. In addition, it facilitates the process to:</p> <ul style="list-style-type: none"> ✦ Determine modalities of application of the law concerning the exploitation of mines and quarries and improve on the fiscal regimes of mining and quarrying activities. ✦ Regulate commercial exploitation of substances excluded from definition of minerals under Article 244(5) of the constitution and supports the sector growth to attain 3% GDP contribution. ✦ Regulate the sale and purchase agreement conditions of minerals in the country; ✦ Improve on the conditions of Mineral Development Agreements to allow for free carry interest by the Government on mining projects. ✦ Determining the modalities for management of the social, health, safety and environment aspects in the mining and minerals subsector in accordance with the respective laws on the | <p>This may attract additional costs but the long term benefits far outweigh the associated costs of its implementation.</p> | <p>This will accelerate achievement of provisions enshrined in the new Mining and Minerals Policy, 2018 as well as the National Development Plan (NDP II) and Vision 2040.</p> |

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| | <p>subject</p> <ul style="list-style-type: none"> ✚ Ensure implementations of international conventions under the minerals and mining sector. ✚ Enable government to regulate the mushrooming mineral processing and beneficiation plants for improved value mineral addition and revenue to the country. ✚ Enable efficient regulation of Artisanal and Small-scale mining in the country. ✚ Strengthen the capacity of the mineral subsector to enhance optimal resource exploration and development and eradicate mushrooming illegal mining activities in the country. ✚ Enable government to articulate and provide clear guidelines on mineral licensing, national participation and local content and mainstream the co-existence of mining activities and other land uses. | | |
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The first two policy options may slow down achievement of provisions enshrined in the new Mining and Minerals Policy, 2018 as well as the National Development Plan (NDP II) and Vision 2040. As a result, the repeal and replace option is the most preferred, applicable and viable option that provides opportunities to optimize benefits from mineral wealth, strengthen institutional capacity and mineral sector regulation for the benefit of all stakeholders.

4 IMPACT ANALYSIS

4.1 Expected Impacts

a) National Competitiveness

The primary principles of the mineral and mining policy, 2018 is to offer a competitive, predictable and stable fiscal regime to attract both local and foreign investment to the mineral sector. The policy is expected to put in place a favourable regulatory environment and facilitate ease of doing business through clear and predictable process to grant and revoke mineral rights.

b) Employment Opportunities for Ugandans.

The mineral sector is a contributor to local employment directly and indirectly through supply of goods and services. For example, Low Value Minerals and Materials subsector has untapped potential to employ more than 500,000 women and men. National statistics suggest the mineral sector employed at least 200,000 people in the FY 2012/13 and this is projected to increase to 250,000 women and men in the FY 2017/18. With a robust legal and regulatory environment, the beneficiaries could multiply to more than 500,000 women and men in FY 2019/20.

c) Increase Contribution to GDP

Mineral sector contribution to GDP is projected to rise to 0.91%, by FY 2019/20. However, a 2017 baseline study by African, Caribbean and Pacific Group of States – European Union (ACP-EU) Development Minerals Program indicates that neglected development minerals (Low value minerals) such as sand, clay, stones alone have potential to increase mineral sector GDP contribution to 3%. Therefore, with a relevant and enabling legal and regulatory environment, development minerals are expected to be an engine of sustained economic growth.

d) Human Rights, Health and Environmental Issues

The preferred policy option has no significant impact on the environment, human rights, health and well-being. Nonetheless, a combination mitigation measures such as environmental bond, sanctions and punitive measures have been provided for to address aspects of non-compliance with social, human rights, health and environmental guidelines and procedures.

e) Socially Excluded or Vulnerable Persons:

The proposed legal and regulatory framework provides for all-inclusive participation of women and vulnerable groups in all spheres of the mineral sector.

In general terms, creation of employment, improved service delivery, investment opportunities, increased environmental protection, poverty eradication through national and household incomes and revenues ranks high are among the expected impacts. Additional impacts as described below are anticipated on mineral sector stakeholders.

- g) **Small and Medium Enterprises (SMEs):** SMEs will harness more opportunities, acquire specialized skills and training, boost manufacturing industries (i.e. mineral processing) and attract more local content promotion (Buy Uganda Build Uganda Policy).
- h) **Local Government:** With a well-regulated mineral sector, Local Governments will harness more revenues, employment, and local infrastructure development.
- i) **Local communities:** Multiple benefits exist for local communities and these include: direct employment, indirect employment through trade and service provision, skills transfer and other benefits accruing from social corporate responsibilities of successful exploration and mining operations.
- j) **Agriculture Sector:** Access to locally manufactured and affordable agriculture inputs such as phosphate fertilizers alongside infrastructure development in the mineral rich areas shall transform lives of the majority of Ugandans who are still employed in the agriculture sector.
- k) **Manufacturing Sector:** Local value addition along the production and supply chain shall boost the local manufacturing sector and tap more local employment opportunities.
- l) **Civil Society Organizations (CSO) and the media;** CSOs and media participation and role in the mineral sector shall increase for purposes of accountability and transparency.