



REPORT FOR THE OFFICIAL LAUNCH OF THE 4TH EITI REPORT

20TH NOVEMBER 2025



PREPARED BY:
GERTRUDE ANGOM

ACRONYMS

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|---------|--|
| ACODE | - Advocates Coalition for Development and Environment |
| BOU | - Bank of Uganda |
| CEO | - Chief Executive Officer |
| CNOOC | - China National Offshore Oil Corporation |
| CSCO | - Civil Society Coalition on Oil and Gas |
| CSO | - Civil Society Organisation |
| DGSM | - Department of Geological Survey and Mines |
| ED | - Executive Director |
| EITI | - Extractive Industries Transparency Initiative |
| ESIA | - Environmental and Social Impact Assessment |
| EU | - European Union |
| GIZ | - Deutsche Gesellschaft für Internationale Zusammenarbeit |
| MEMD | - Ministry of Energy and Mineral Development |
| MOFPED | - Ministry of Finance, Planning and Economic Development |
| NEMA | - National Environment Management Authority |
| NRGI | - Natural Resource Governance Institute |
| NPA | - National Planning Authority |
| OAG | - Office of the Auditor General |
| PAU | - Petroleum Authority of Uganda |
| PWYP | - Publish What You Pay |
| SEATINI | - Southern and Eastern Africa Trade Information and Negotiations Institute |
| UBOS | - Uganda Bureau of Statistics |
| UGAASM | - Uganda Association of Artisanal & Small-Scale Miners |
| UGEITI | - Uganda Extractive Industries Transparency Initiative |
| UNOC | - Uganda National Oil Company |
| URA | - Uganda Revenue Authority |
| URSB | - Uganda Registration Services Bureau |
| WB | - World Bank |

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EXECUTIVE SUMMARY

The Uganda Extractive Industries Transparency Initiative (UGEITI) officially launched its Fourth EITI Report on 20th November 2025 at the Protea Hotel, Kampala. The event was attended by over 100 participants (listed in Annex), representing Government, industry, civil society, development partners, and the media, and was organised in collaboration with the Natural Resource Governance Institute (NRGI), the Advocates Coalition for Development and Environment (ACODE), and the Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI). The launch marked a major milestone in Uganda's continued commitment to improving transparency, accountability, and governance in the extractives sector.

The report—covering the period 1st July 2022 to 30th June 2023—was formally launched by the State Minister of Planning – Hon. Amos Lugolobi, Ministry of Finance, Planning and Economic Development (MoFPED), and witnessed by the UGEITI Multi-Stakeholder Group (MSG), partner MDAs, private sector actors, civil society organisations, development partners, and the media. The key objectives of the launch were to:

- a) Present the findings of the Fourth EITI Report,
- b) Provide a platform for dialogue on sector reforms,
- c) Enhance public understanding of the sector's performance,
- d) Strengthen collaboration among key stakeholders, including government, development partners, and the private sector.

The report, prepared by Moore Insight as the Independent Administrator, evaluates Uganda's compliance with the 2023 EITI Standard, covering the full extractive value chain—including exploration, licensing, production, legal and institutional frameworks, revenues, local content, environmental management, and social and environmental expenditures.

Key findings indicate that total revenue from the extractive sector in FY 2022/23 amounted to UGX 530.17 billion, with the mining sector contributing UGX 299.95 billion and the oil and gas sector contributing UGX 230.23 billion. The sector's overall economic contribution was measured at 1.47% of GDP, 0.026% of total employment, 0.001% of total exports, and 1.13% of general government revenues. Mineral exports were valued at UGX 33.6 billion, dominated by vermiculite, iron ore, and tungsten. There was no oil and gas production or export during the period, as activities remained in the exploration and pre-production phases.

The report presents several key recommendations, including strengthening the legal basis for UGEITI reporting, enhancing beneficial ownership data, improving disclosure of financial statements, project costs, and greenhouse gas emissions, and strengthening the mining and petroleum cadastre systems. It also emphasizes the need for consistent follow-up on previous recommendations.

Overall, the launch reinforced the role of EITI in promoting public awareness, informed debate, and accountability through systematic data disclosure. It also underscores Uganda's steady progress in embedding transparency in the extractive sector and provides a foundation for continuous improvement in governance and resource management.

The event was moderated by Mr. James Muhindo, Senior Legal Officer for Board and PCE Affairs at the National Environment Management Authority (NEMA).

1.0 KEY REMARKS BY MR. SAUL ONGARIA, NATIONAL COORDINATOR, UGEITI



Mr. Saul Ongaria welcomed participants to the launch of the Fourth Uganda EITI Report and expressed his honour in hosting the event. He noted that the launch provided an important opportunity to reflect on the extractive sector, which in many countries remains opaque, resulting in limited access to information and missed opportunities for investment and revenue.

He highlighted that Uganda had chosen a different path by promoting openness, transparency, and accountability across the extractive sector. He emphasized that for emerging economies like Uganda, transparency was essential for creating a fair business environment, ensuring proper oversight, and accurately projecting revenue.

Mr. Ongaria reminded participants that principles of transparency and accountability were central to good governance of the sector and that this was the reason the Government of Uganda subscribed to the EITI Standard. He explained that EITI implementation in Uganda was driven by a multi-stakeholder group comprising representatives from government institutions, civil society, and the private sector. He

acknowledged the contributions of MSG members from institutions such as URA, MEMD, NEMA, and PAU, noting that this platform facilitated the exchange of ideas and information on sector developments.

He stated that the event was the result of the collective efforts of the MSG, with the key output being the annual EITI Report. He further outlined the objectives of the launch, which were to:

- a) Present the findings of the Fourth EITI Report
- b) Provide a platform for dialogue on sector reforms
- c) Enhance public understanding of the sector's performance
- d) Strengthen collaboration among key stakeholders, including government, development partners, and the private sector

In conclusion, he thanked all participants, government institutions, and development partners for their support and wished them fruitful deliberations.

2.0 OPENING REMARKS BY MINISTRY OF ENERGY AND MINERAL DEVELOPMENT



Mr. Joshua Lukaye, Assistant Commissioner, MEMD speaking on behalf of the Minister of Energy and Mineral Development, welcomed participants to the launch of Uganda's Fourth EITI Report. He noted that the event marked a significant milestone in strengthening transparency, accountability, and good governance in the extractive sector.

He emphasized that Uganda's rich mineral resources—ranging from gold and iron ore to lithium, cobalt, and rare earth elements—had the potential to drive national development if managed responsibly and sustainably. He highlighted the Ministry's ongoing efforts to create an enabling environment for investment, promote value addition, and enhance oversight in line with national development goals.

Mr. Lukaye outlined key milestones achieved since the previous EITI reporting cycle. These included:

a) Operationalization of the Uganda National Mining Company (UNMC).

The company became fully operational following the inauguration of its Board.

b) Advancements in Value Addition and Industrialisation.

Commissioning of new steel plants, including the Direct Reduced Iron plant at Tembo Steel (Iganga)

and the Abyssinia Steel Plant (Jinja).

c) Revival of Kilembe Mines.

Signing of Uganda's first Mineral Production Sharing Agreement for copper and cobalt development.

d) New Industrial Investments.

Agreements signed for the establishment of:

- An iron and steel plant in Tororo (Devki Steel Mills).
- A cement factory in Mbarara (National Cement Company).

e) Formalisation of Artisanal and Small-Scale Mining (ASM)

- Issuance of the Artisanal Mining Regulations.
- Biometric registration of 6,884 artisanal miners.
- Licensing of groups such as Mubende United Miners Assembly and Kakoka Artisanal Miners Association.

f) Strengthening Uganda's Position in Gold Refining.

Commissioning of the Wagagai Gold Mining Project in Busia, producing 99.9% pure refined gold.

He stated that these achievements demonstrated Government's commitment to resource governance, local content development, and economic transformation. He added that the EITI process continued

to support this agenda by providing independently verified information that improved public accountability and policy decision-making.

In conclusion, he thanked all stakeholders—government entities, development partners, civil society, the private sector, and the MSG—for contributing to the preparation of the Fourth Report and reaffirmed the Ministry’s commitment to ensuring responsible and transparent management of Uganda’s mineral and energy resources.

3.0 REMARKS BY THE MSG CHAIRPERSON, MRS MOSES KAGGWA

The MSG Chairperson, Mr. Moses Kaggwa (pictured below), welcomed participants to the launch of Uganda’s Fourth EITI Report and noted that the publication marked another major step in promoting transparency, accountability, and good governance in the extractive sector. He recalled that when Uganda discovered oil and gas resources, Government took deliberate steps to strengthen the management of the extractive sector by establishing the necessary institutions, reforming policy and legal frameworks, and eventually joining the EITI in 2020 to enhance openness and accountability.



Mr. Kaggwa reported that since joining EITI, Uganda had produced four reports covering FY2019/20 to FY2022/23. He explained that the Fourth EITI Report presented reconciled revenue data from extractive companies, government receipts, production trends, economic contributions, and policy recommendations aimed at improving sector governance.

He highlighted key achievements registered over six years of implementation. These included increased transparency through wider disclosure of revenues and beneficial ownership information, improved coordination among government institutions, civil society, and industry, and enhanced public awareness among communities in extractive regions. He noted that EITI had also supported key legal reforms such as the Mining and Minerals Act, 2022 and the Charter of Fiscal Responsibility, which set a framework for responsible management of oil revenues.

Mr. Kaggwa further reported that Uganda had successfully undergone EITI country validation in 2023, achieving a score of 78.5, demonstrating its commitment to meeting the global standard.

He expressed appreciation to the Multi-Stakeholder Group, Government institutions, civil society, industry players, and the EITI Secretariat for steering the process effectively. He encouraged stakeholders to actively participate in the day’s discussions and to continue working together to strengthen governance of the extractive sector for the benefit of future generations.

4.0 KEY HIGHLIGHTS OF THE 4TH EITI REPORT

Mr. Rached Maleej, speaking on behalf of the Independent Administrator (Moore Insight), presented the key findings of the Fourth Uganda EITI Report (via zoom). He reported that total revenues from the extractive sector amounted to UGX 530.17 billion, with the oil and gas industry contributing 57 percent and the mining sector contributing 43 percent. He noted that URA accounted for over 90 percent of total government receipts.

He highlighted that the following five companies contributed the largest share of revenues, collectively accounting for the majority of sector collections:

- a) TotalEnergies EP Uganda
- b) CNOOC Uganda Ltd
- c) Uganda National Oil Company (UNOC)
- d) Hima Cement Ltd
- e) Tororo Cement Ltd

He further noted that the main revenue streams were:

- a) Pay As You Earn (PAYE)
- b) Withholding tax
- c) Value Added Tax (VAT)
- d) Customs payments

On completeness and data quality, he reported that although all government agencies submitted declarations, only 73 percent of the sector's revenues were covered by extractive entities that filed reporting templates. He noted that some declarations lacked Auditor General certification, and only six out of twenty companies provided signed reporting forms, limiting the level of assurance that the data fully reflected all revenues.

Mr. Maleej further presented the sector's contribution to the economy, noting that mining contributed 1.47% to GDP, while the overall extractive sector contributed 1.13% to general government revenue, 0.026% to national employment, and 0.001% to exports.

He reported that during FY2022/23, the oil and gas sector remained in the exploration and pre-production phase, while mining companies such as Sino Minerals, Hima Cement, Tororo Cement, and Namekara Mining had the highest production values. Limestone and iron ore were identified as the leading minerals by production value. Vermiculite, iron ore, and tungsten ores accounted for most mineral exports.

Presenting reconciliation results, he noted discrepancies of UGX 143.47 billion, mostly arising from companies that did not submit templates, taxes not reported by companies, and revenues not captured by government agencies. He outlined adjustments made on both company and government declarations, particularly taxes related to non-extractive activities.

Finally, Mr. Maleej shared key recommendations to strengthen Uganda's EITI implementation. These included improving the legal basis for EITI reporting, enhancing beneficial ownership and contract transparency, strengthening environmental and social expenditure reporting, improving public disclosure of financial information, increasing transparency of project-level expenditures, and developing a framework for disclosing greenhouse gas emissions in the extractive sector.

5.0 REMARKS BY THE STATE MINISTER OF PLANNING AT THE MINISTRY OF FINANCE, PLANNING AND ECONOMIC DEVELOPMENT



Hon. Amos Lugolobi, the State Minister of Planning at MOFPED, expressed his honour at presiding over the launch of Uganda's 4th Extractive Industries Transparency Initiative (EITI) Report. He extended his appreciation to the Uganda EITI Multi-Stakeholder Group, the EITI Secretariat, and all relevant public and private entities for their work in producing the report.

He noted that the report went beyond fulfilling an international obligation, as it strengthened domestic systems of accountability and transparency. He emphasized that the principles of transparency, accountability, and resource efficiency, highlighted in the fourth National Development Plan (NDP IV), were crucial for maximizing Uganda's natural resource endowments to drive industrialization, job creation, and improved public service delivery. He added that transparency was not only a safeguard against corruption but also a catalyst for investment and a foundation for inclusive growth.

According to Hon. Amos Lugolobi, the report shed light on revenues collected, the performance of extractive companies, the allocation of licenses, the integrity of the value chain, and adherence to environmental and social obligations. He highlighted the importance of domestic revenue mobilisation (DRM) in an era of shrinking external concessional financing and increasing national budget demands, noting that the EITI framework had helped reduce leakages, curb illicit financial flows, and ensure full collection of revenues due to the State.

He cited data from URA, PAU, MEMD, NEMA, and Local Governments as having helped identify and close administrative gaps and support accurate revenue forecasting, particularly from oil and gas production, royalties, corporate taxes, signature bonuses, and other fiscal instruments. He further observed that the EITI framework had enhanced public confidence, improved compliance with tax obligations, reduced suspicion, increased legitimacy, and strengthened the social contract.

Hon. Lugolobi underscored that Uganda's Vision 2040 relied on harnessing natural resources—including oil, gas, and strategic minerals—to achieve upper-middle-income status. He stressed that resource wealth should serve as a driver of broad-based prosperity, not a curse, and that transparency, good governance, and institutional reforms were prerequisites for economic transformation. He concluded that consistent and credible transparency reports sent a strong signal to investors regarding Uganda's commitment to modern governance standards.

Finally, he reiterated the Government's commitment to full implementation of the EITI Standard, noting that the report brought the country closer to achieving the aspirations of NDP IV and Uganda

Vision 2040. He officially launched the fourth EITI Report and thanked all stakeholders for their commitment and support, expressing hope for continued engagement in building a transparent, prosperous, and resource-secure Uganda

6.0 RECEIVING OF CERTIFICATES

In recognition of their active participation and commitment to ensuring effective implementation of the EITI in Uganda, key Government institutions and companies that submitted all required data for the 4th EITI Report were presented with Certificates of Excellence. These awards underscored the critical role of these entities in promoting transparency, accountability, and good governance in the extractive sector, as well as their contribution to improving domestic revenue mobilisation and public trust in resource management.

In the presence of the MSG Chairperson, Mr. Moses Kagawa, the UGEITI National Coordinator, Mr. Saul Ongaria, and the Head of the UGEITI Secretariat, Mrs. Gloria Mugambe, the Hon. Minister, Mr. Amos Lugolobi, officially presented the awards to the following companies and institutions:

- a) Petroleum Authority of Uganda (PAU)
- b) Directorate of Geological Survey and Mines (DGSM)
- c) Oranto Petroleum
- d) Mota-Engil Africa
- e) TotalEnergies
- f) Direct Reduced Iron Limited
- g) Syno Minerals Investment Company
- h) CNOOC Uganda Limited

The recognition served not only as a formal appreciation of their compliance with EITI reporting requirements but also as an encouragement for continued excellence and collaboration in advancing Uganda's transparency agenda. These exemplary performers set a benchmark for other entities in the sector, demonstrating the tangible benefits of full participation in EITI processes.

See group picture below:



7.0 OFFICIAL LAUNCH OF THE 4TH EITI REPORT

The 4th Uganda EITI Report was officially launched by the Hon. Minister, Mr. Amos Lugolobi, alongside the MSG Chairperson, Mr. Moses Kaggwa. The launch marked a significant milestone in Uganda's commitment to transparency, accountability, and good governance in the extractive sector. The report dummy was signed by dignitaries, partners and MSG members, symbolizing collective endorsement and support for the principles of the EITI. See a few pictures below:



8.0 FIVE YEARS OF EITI IMPLEMENTATION

Mrs. Gloria Mugambe, Head of the UGEITI Secretariat, provided an overview of five years of EITI implementation in Uganda, drawing lessons learnt and outlining the forward-looking agenda during the launch of the 4th EITI Report on 20th November 2025. She noted that Uganda joined the EITI in August 2020 with the objective of:



- a) Promoting transparency,
- b) Strengthening accountability,
- c) Enhancing investor confidence,
- d) Demystifying the extractive sector,
- e) Ensuring optimal revenue collection and management.

She explained that EITI implementation was overseen by the Multi-Stakeholder Group (MSG), a 25-member steering committee representing government, industry, and civil society. Implementation followed an annual work-plan approved by the MSG, complemented by an annual progress report detailing achievements.

She highlighted that Uganda had published its first EITI report in May 2022, followed by subsequent reports in June 2023, October 2024, and September 2025.

On what it meant to be an EITI member, Mrs. Gloria Mugambe explained that a country must have a functional MSG and produce annual EITI reports covering the legal and regulatory framework, status of exploration and production, revenue collection and allocation, social and economic spending, and overall outcomes and impact. She added that the findings of these reports should be disseminated to promote informed debate, accountability, and awareness among extractive communities of their rights and potential benefits.

Reflecting on lessons learnt, she emphasized the importance of continuous and consistent stakeholder sensitisation. She stated that while companies in the oil and gas sector had embedded EITI reporting into their routine, mining companies still faced challenges in compliance. She noted that, because reporting was not legally compulsory, achieving full compliance remained difficult. She further highlighted that implementing recommendations required coordinated efforts across Ministries, Departments, and Agencies, and that several recommendations from previous reports had recurred over the years, including those on contract transparency, beneficial ownership, and data on exports and production.

Looking forward, Mrs. Mugambe outlined the next level of reporting, which would include:

- a) Delinking manufacturing revenue from extractive revenue,
- b) Closing gaps in data reported by different Government agencies,
- c) Conducting detailed analysis of Local Government royalties,
- d) Improving compliance with data quality and assurance requirements through:
 - Completed templates,
 - Senior management sign-off,
 - External audit certification,

- Audited financial statements.

She also underscored the importance of transparency reforms, particularly:

- Contract disclosure, and
- Beneficial ownership transparency.

On EITI implementation follow-up, she noted that the Secretariat would continue monitoring report recommendations and prepare for the next Validation in July 2026. She recalled that the previous Validation in May 2024 had resulted in 14 corrective actions and 18 recommendations, emphasizing full contract disclosure, beneficial ownership transparency, systematic disclosure, and open data availability. She concluded by reiterating the cyclical nature of EITI implementation through work-plan execution, annual progress reporting, and national reporting.

9.0 PANEL DISCUSSION



9.1 Panel Introduction

The moderator, Mr. James Muhindo (in picture aside) informed participants that Uganda’s participation in EITI was not only to meet international expectations but also to derive local benefit. Four members of the Multi-Stakeholder Group (MSG) were invited to the panel to demonstrate how Uganda could leverage EITI to improve governance of the extractive sector. The panel comprised representatives from civil society, artisanal and small-scale miners, the private sector, and Government:

1. Mr. Faustine Mugisha – Total Energies, representing the Industry Constituency (oil & gas)
2. Ms. Winfred Ngabirwe – Global Rights Alert, representing Civil Society Organisations
3. Mr. Kenneth Asiimwe – Uganda Association of Artisanal & Small-Scale Miners (UGAASM), representing the Industry Constituency (artisanal miners)
4. Mr. Lawrence Muwonge – Uganda Revenue Authority, representing the Government Constituency.



9.2 Opening Question to All Panelists

Question:

“If you had a magic word to improve transparency, accountability, and the broader EITI standards—including environment, social governance, or energy transition—what is the one thing you would change to ensure we achieve better outcomes?”

- Response 1 – Private Sector (Oil & Gas)

The private sector representative stated that their priority would have been contract disclosure, which Total Energies had been advocating for since 2020. He stressed that if he had the power, contracts would be published immediately. He also reaffirmed the company’s commitment to transparency under EITI.

- Response 2 – Civil Society

The civil society representative said she would make EITI a bottom-up process. She explained that extractive sector information often remained in technical boardrooms, international reports, and elite discussions, yet the communities who hosted extractive activities—those who were affected and those who hoped to benefit—were rarely involved. She emphasised the need to make the process accessible, relevant, meaningful, and community-driven.

- Response 3 – Artisanal & Small-Scale Mining Sector

The representative from artisanal and small-scale miners stated that from a business perspective, compliance was a cost. He argued that compliance should come with clear incentives that made business sense. He proposed that compliant entities should receive priority access to programmes such as the Parish Development Model and other business opportunities. He stressed that if compliance cost a miner 10% of their revenue, it should return 10 to 20 % in benefits. He called for EITI to make transparency financially worthwhile.

- Response 4 – Government (URA)

The Government representative emphasised the need for collaboration among MDAs, companies, and artisanal miners. He noted that discrepancies reflected in the EITI Report often arose from differences in reporting between institutions (e.g., what URA collected on behalf of Government versus what another agency recorded). He stressed that joint efforts were essential to achieving accuracy and transparency in EITI reporting.

9.3 Second Round of Questions to Individual Panelists

9.3.1. Civil Society: Integration of Gender and Community Perspectives

- Question:

“What has civil society done to ensure gender and community perspectives are integrated in the EITI Report? What is limiting progress in this area?”

- Response – Civil Society

The civil society representative provided a historical background, noting that EITI originated from NGO advocacy in the late 1990s. Organisations such as Global Witness and the Publish What You Pay coalition pushed for transparency in revenue flows, and civil society in Uganda had continued to shape the EITI Standard.

She explained that by 2019, civil society globally—including Ugandan organisations—had strongly influenced the inclusion of gender, youth, community impact, and indigenous peoples’ concerns in the updated EITI Standard. Civil society had also championed beneficial ownership transparency to identify who owned extractive companies and to curb corruption that deprived communities of revenue meant for social services.

She highlighted several achievements:

- a) Advocacy against illicit financial flows, which diverted resources away from essential services.
- b) Bridging the gap between the MSG and communities, including organising field visits—such as the first MSG engagement with miners in Kasanda—which helped MSG members understand on-ground realities.
- c) Pushing for inclusion of small-scale miners on the MSG, which broadened representation and enriched discussions.

- d) Supporting community awareness, taking EITI Reports to grassroots level and helping affected populations understand the information.
- e) Strengthening national dialogue by influencing practices in institutions such as URA, the Auditor General, and the Bank of Uganda.

She noted that while not every community or group could be represented, civil society had continued to amplify voices and extend EITI conversations beyond technical rooms to where extractive impacts were felt most strongly. She hoped future reports would increasingly reflect perspectives of women, youth, and affected community members.

9.3.2. Artisanal & Small-Scale Mining: Environmental, Social, and Gender Issues

- Question:
“Artisanal and small-scale mining is often criticised for neglecting environment, gender, and social issues. What challenges do you face, and what are you doing to address these concerns?”
- Response – Artisanal & Small-Scale Miners

He argued that artisanal miners had long been part of the sector and should not be sidelined.

He emphasised several challenges:

- a) Weak legal frameworks
- b) Limited access to formalisation
- c) Low levels of environmental regulation support
- d) Lack of inclusion in policymaking processes

He argued that now that artisanal miners were represented on the MSG, the sector needed to shift its language from “they should make laws” to “we should make laws”, because miners were now part of the national reform process. He called for collective responsibility in shaping and implementing EITI recommendations to ensure responsible mining.

9.3.3. Private Sector (Oil & Gas): Compliance Without Legal Obligation

- Question:
“The report noted the absence of a legally binding instrument requiring private companies to submit information to EITI. What steps is the private sector taking to ensure compliance in this context?”
- Response – Private Sector

The private sector representative explained that Total Energies had been involved in EITI from the beginning at the highest international level. The company valued EITI because transparency protected both the public and private actors from misrepresentation, especially given the controversies surrounding oil revenue utilisation.

He noted that participation helped:

- a) Show clearly what revenues were generated,
- b) Identify where they were paid, and
- c) Clarify how they were utilised by government.

He emphasised that Total Energies had fully integrated EITI principles into its operations and internal processes to ensure accountability across its teams. He stressed that both the payer and the recipient had an obligation to report accurately to maintain public trust.

9.3.4. Government (URA): Measures to Address Data Gaps

- Question:
“What measures are being taken to address the data gaps noted in the report, particularly around production and revenue flows?”
- Response – Government (URA)

The Government representative began by clarifying that the data gaps in the report did not relate to missing money. Instead, they concerned differences between what URA reported on behalf of agencies

and what those agencies themselves recorded. He explained that URA collected central government revenue for multiple institutions, and discrepancies often resulted from inconsistencies in reporting systems or timelines.

9.3.5. Comments and Questions from the audience & Panel Responses

a) Question 1: Disclosure of Contracts

Participant: Assistant Commissioner from MEMD

Comment:

Not a question., he stated that there had been ongoing discussions with international oil companies regarding the disclosure of contracts, and pointed out the following:

- Total transparency was being pursued.
- The Solicitor General had cleared the disclosure of all Production Sharing Agreements (PSAs).
- Current work was on the modalities of disclosure, including whether to publish in newspapers such as *New Vision* or *Monitor* to ensure public comfort on transparency.

b) Question 2: Revenue Reporting in the Mining Sector

Participant: Ms. Ankunda Phoebe, ACODE

Question:

How does the report ensure that revenue contributions from the largely informal mining sector are accurately captured, avoiding underreporting?

c) Follow-up Question:

Dr. Arthur Bainomugisha, Executive Director, ACODE:

What measures are being taken by URA to support artisanal miners to formalize, earn profit, and pay taxes fairly? The concern is that the current approach is top-down and lacks participatory involvement.

Panel Response / Summary:

- Recognition that informal mining is significant, and thresholds are being adjusted to capture more companies in EITI reporting.
- Emphasis on participatory approaches for small-scale and artisanal miners to increase compliance and revenue reporting.
- Collaboration between Government, private sector, and civil society is critical to sustainable inclusion.

d) Question 3: Data Sharing Between Agencies

Participant: Mr. Anguyo William, UBOS

Questions:

1. *Why do oil and gas companies submit data to EITI but not to UBOS?*
2. *What information has EITI shared with oil and gas companies to ensure transparency?*
3. *Does the Association of Artisan Miners share production data with MEMD, and can it be used for validation?*

Panel Response / Summary:

- Multiple agencies requesting similar data creates duplication and reporting fatigue. Streamlining is required so that one submission can satisfy multiple entities.
- Collaboration is ongoing to ensure that when data is shared with MEMD or PAU, it can be used by other agencies.

- For artisanal miners, establishing context-specific EITI templates would help capture small-scale production more accurately.

e) Question 4: Discrepancies in Gold Reporting

Participant: Wambi Michael, Uganda Radio Network

Question:

There are discrepancies in gold reporting between Government bodies, such as differences between Ministry of Trade and URA data. How can these inconsistencies be addressed, and is there a risk of smuggling? Also share information on cost recovery.

Panel Response / Summary:

- Cost recovery in the oil sector is transparent and validated by PAU and the Auditor General before funds are recovered.
- Discrepancies in gold reporting are longstanding. Limited resources and capacity in the MEMD affect accurate data collection.
- Moving forward, improved inspection, reporting, and coordination with artisanal miners is needed to reduce inconsistencies.

f) Question 5: Support for Small-Scale and Artisanal Miners

Participant: Mr. Mugambwa Owen, SEATINI

Key Concerns Raised:

- The costs and procedures for formalising artisanal and small-scale miners needed to be non-punitive.
- The national requirement for 99.9% gold purity did not match the needs of most export markets, which created unnecessary financial burdens and contributed to sector leakages

Panel Response:

The panel acknowledged that artisanal and small-scale miners required both technical and financial support to comply with formalisation requirements. They stressed that Government interventions should be practical, market-aligned, and sensitive to operational realities on the ground.

They also emphasised that extension services—rather than enforcement—should guide miners through compliance, safety, and business processes.

The representative of artisanal miners provided the following clarifications and concerns:

- **Mercury Use and Cost Implications**
He explained that while mercury posed health and environmental risks, the solution should not have been to transfer the entire cost burden to miners. He noted that if alternatives were required, the government or responsible agencies needed to provide support, instead of expecting miners to finance costly technological transitions on their own.
- **Licensing Delays and Administrative Barriers**
He highlighted that many miners operated without licences because licensing timelines were frequently ignored. He argued that if an application remained unprocessed for 60 days, the system should assume automatic approval, enabling miners to continue working legally rather than being pushed into informality.
- **Regulation Without Support**
The miners faced a situation where multiple regulators came to enforce, close operations, or demand compliance, yet very few came to support or build capacity. He stressed the need for

consistent extension services that could help miners improve practices, understand legal obligations, and transition away from harmful methods.

- **Data Sharing and Transparency**

He clarified that miners submitted quarterly production returns to the DGSM. They were, therefore, willing to provide data and participate in transparency efforts, provided the processes were clear, supportive, and did not impose unreasonable administrative costs.

The discussion continued with emphasis on tax obligations. It was noted that the Income Tax Act applied to everyone, as it was the primary law governing taxation of income and related financial activities.

9.3.6 Remarks by Mr. Clovice Irumba, PAU

Mr. Irumba began by addressing concerns raised by Mr. Kenneth Asimwe, noting that the frequency of challenges faced by artisanal miners, despite the enactment of the Mining and Minerals Act less than two years earlier. He stated that there were still gaps requiring attention. He recommended that the MSG take these discussions forward and ensure that all observations were recorded for further review.

He encouraged recipients of certificates to use them strategically—for example, by presenting them in internal meetings to emphasise the importance of timely data submission. This symbolised the high value the MSG and Secretariat placed on collaboration when requesting information essential for transparency.

Mr. Irumba then addressed concerns raised by UBOS. He emphasised the need to understand how Government reporting frameworks functioned. In the oil and gas sector, he explained, several structures had been put in place:

- The National Petroleum Policy, recently approved by Cabinet on 20th October, replaced the earlier National Oil and Gas Policy.
- The policy was supported by primary legislation, with ministers empowered to issue regulations.
- These frameworks contained mandatory reporting requirements for licence holders.
- A National Petroleum Data Repository (NPDR)—established under Section 148 of the Petroleum Act—was managed by the Petroleum Authority of Uganda (PAU).

He clarified that the NPDR served multiple institutions, such as:

- MEMD (promotion of exploration)
- OAG (cost auditing)
- PAU (operational management)
- URA (tax administration)
- MOFPED (national planning)

He reminded participants that requests for petroleum data should be directed to the NPDR rather than individual companies, as only the Ministry and PAU had the legal mandate to require submission of such data.

He further explained the framework for managing recoverable costs. He stated that companies submitted annual work programmes and budgets, which were reviewed by an advisory committee chaired by the PAU. Only approved activities were eligible for cost recovery. The Auditor General audited these expenditures, and only compliant costs were recommended for recovery. The audit reports were then submitted to Parliament. He stressed that the process was clear and that institutions such as PAU were available to guide stakeholders who needed deeper understanding.

Mr. Clovice Irumba closed by commending the panel, noting that it represented the MSG exceptionally well. He highlighted the value of the MSG forum in demystifying Government actions and promoting transparency. He also commended the Moderator, Mr. James Muhindo, for effectively guiding the discussion. He encouraged stakeholders to embrace transparency not because of international pressure but because it benefited Uganda.

9.3.7 Secretariat Responses

The Secretariat addressed three outstanding questions:

- Under-Reporting in the Informal Mining Sector

They explained that the EITI methodology captured only entities with licences; therefore, informal operations were currently outside the reporting framework. Biometric registration of artisanal miners by the Ministry of Energy was ongoing and would gradually improve data coverage.

- Recoverable Costs Figures

While the process had been explained earlier, the specific figures formed part of the Production Sharing Agreements (PSAs) and were not yet public. The Office of the Auditor General had audited recoverable costs up to FY 2018/19, and the Secretariat expected more clarity once contract disclosures were fully implemented.

- Gold Data Discrepancy

The Secretariat also elaborated on the gold export controversy, citing differences in data from URA, Bank of Uganda, and DGSM. DGSM's records showed the lowest figures because it could report only what came from licensed operations.

9.3.8 Remarks by Mr. David Sebagala, DGSM

Mr. Sebagala added that most gold production came from artisanal miners operating illegally or under exploration licences, who could not declare production without risking licence cancellation. He noted the need for closer coordination with URA and Customs to harmonise figures.

10.0 CLOSING REMARKS



Dr. Arthur Bainomugisha, the Executive Director of the Advocates Coalition for Development and Environment (ACODE), delivered the closing remarks. He thanked all participants for their active engagement and noted that the day's discussions had been very productive and insightful.

He expressed appreciation to the Government of Uganda for joining and supporting the EITI process. Dr. Bainomugisha further urged all stakeholders to strengthen collaboration and make it easier to work with one another so that

the EITI process could generate accurate, reliable, and comprehensive statistics.

11.0 ANNEX

11.1 List of Participants:

1. Hon. Amos Lugoloobi – Ministry of Finance, Planning and Economic Development
2. Mr. Moses Kaggwa – Ministry of Finance, Planning and Economic Development
3. Mr. Lukaye Joshua – Ministry of Energy and Mineral Development
4. Dr. Arthur Bainomugisha – Advocates Coalition for Development and Environment (ACODE)
5. Mr. Twesigye Bashir – Centre for Research in Energy and Development (CRED)
6. Mrs. James Muhindo – National Environment Management Authority (NEMA)
7. Eng. Dr. Samuel Acidri – Uganda National Mining Company (UNMC)
8. Mr. Ainebyoona Bob – Ministry of Finance, Planning and Economic Development
9. Mr. Ahimbisibwe Joseph – National Environment Management Authority (NEMA)
10. Ms. Atukunda Phoebe – Advocates Coalition for Development and Environment (ACODE)
11. Begumya Gibra – Ministry of Finance, Planning and Economic Development
12. Mr. Assimwe Kenneth – Uganda Association of Artisanal & Small-Scale Miners (UGAASM)
13. Mr. Kato Obadiah Anthony – Petroleum Authority of Uganda (PAU)
14. Mr. Shekha Swaleh – Direct Reduced Iron Limited
15. Mr. Paul Mulindwa – Kitara Civil Society Organisations Network (KCSO)
16. Mrs. Louisa Kitabire Ninsiima – Uganda Chamber of Energy and Minerals (UCEM)
17. Mr. David Mugagga – Hima Cement Limited
18. Mrs. Ingrid T. Muhanjuzi – CNOOC Uganda Limited
19. Mr. Stephen Birungi – Bank of Uganda (BOU)
20. Mrs. Lynda Biribonwa – Petroleum Authority of Uganda (PAU)
21. Mr. Adolfo Cidmas – Mota-Engil Africa
22. Mr. Steven Mwiki M – Ministry of Information and Communications Technology (MOICT)
23. Mrs. Denise L. Kukundakwe – Uganda National Mining Company (UNMC)
24. Mrs. Ann-Charlotte Sallman – European Union (EU)
25. Mr. Clovice Bright Irumba – Petroleum Authority of Uganda (PAU)
26. Mr. Winston Mugumya – Ministry of Energy and Mineral Development
27. Mrs. Lynn Gitu – Impact / Planet Gold
28. Mr. David Kizza Wolugunga – Transparency International Uganda
29. Mrs. Martha Kiiza Kalema – Bank of Uganda (BOU)
30. Eng. Olaro Oscar – National Planning Authority (NPA)
31. Mr. Natamba Bazinzi – Bank of Uganda (BOU)
32. Mrs. Jane Namubiru – Advocates Coalition for Development and Environment (ACODE)
33. Mr. Mugambwa Owen Paul Dogoto – Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI)
34. Mr. Munanura Brian – Sino Minerals Company Limited
35. Mr. Muwonge Lawrence – Uganda Revenue Authority (URA)
36. Mr. Gilbert Malele – Ministry of Finance, Planning and Economic Development
37. Mr. Denis Kawuma – Ministry of Finance, Planning and Economic Development
38. Eng. Ntogo M. Malik – Ministry of Energy and Mineral Development
39. Mrs. Mpumwine Diana – Women Income Network
40. Mrs. Haawa Namiiro – Organisation of Women in Construction (OWC)
41. Mrs. Winfred Ngabiirwe – Global Rights Alert
42. Mr. Mubiru Richard – Ministry of Finance, Planning and Economic Development
43. Mr. Kiiza Alex – Ministry of Finance, Planning and Economic Development
44. Mrs. Charlotte Mudoola – Uganda Registration Services Bureau (URSB)
45. Eng. Agaba Edwin – Ministry of Works and Transport

46. Mr. Paul Twebaze – Advocates Coalition for Development and Environment (ACODE)
47. Mr. Obad Noah – Oranto Petroleum
48. Mr. Kyeyune Sadat – Uganda Registration Services Bureau (URSB)
49. Mrs. Barbara Magezi N – World Bank
50. Mr. Faustine Mugisha – Total Energies
51. Mr. David Ssebagala – Ministry of Energy and Mineral Development
52. Mrs. Esther Aikiriza Kagira – Financial Intelligence Authority (FIA)
53. Mr. Anguyo William – Uganda Bureau of Statistics (UBOS)
54. Mr. Emmanuel Kibirige – Uganda Association of Artisanal & Small-Scale Miners (UGAASM)
55. Mr. Kyaligonza Aloysious – Ministry of Finance, Planning and Economic Development
56. Mr. Emmanuel S. Katumba – National Planning Authority (NPA)
57. Mr. Joseph Orende – Ministry of Trade, Industry and Cooperatives (MOTIC)
58. Mr. Kwehangana Moses – Ministry of Finance, Planning and Economic Development
59. Mr. Muwanguzi Sam – Central Indiana Council on Aging (CICOA)
60. Mrs. Ann Mary Kusiima – Natural Resource Governance Institute (NRGI)
61. Mr. Anthony Okello – Ministry of Finance, Planning and Economic Development
62. Mrs. Jacinta Anyinge – Uganda Association of Artisanal & Small-Scale Miners (UGAASM)
63. Mr. Mukooza James – Ministry of Finance, Planning and Economic Development
64. Mr. Owor Joel – Parliament of Uganda
65. Mr. Kaddu Fred – Ministry of Finance, Planning and Economic Development
66. Mr. Rukundo Douglas – Ministry of Finance, Planning and Economic Development
67. Mr. Paul Bagabo – Natural Resource Governance Institute (NRGI)
68. Mr. Atwine Abel – Ministry of Trade, Industry and Cooperatives (MOTIC)
69. Mr. Badru Ntege – Private Sector Foundation Uganda (PSFU)
70. Mr. Alexander Ofwono – Ministry of Science, Technology and Innovations (MOSTI)
71. Mrs. Awor Nancy – Ministry of Justice and Constitutional Affairs (MOJCA)
72. Mr. John Mwesigye – Private Sector Foundation Uganda (PSFU)
73. Mr. James Opito – CSCO - online
74. Mr. Rached Maleej – Moore Insight - online
75. Mr. Samy Mejri - Moore Insight - online
76. Ms. Elizabeth Tukwasikanye - online
77. Ms. Nansubuga Judith – online
78. Mr. Imam Mugisha - online
79. Mr. Brian Nahamya - online
80. Mr. Musiime Michael – Avocats Sans Frontiers - online

UGEITI Secretariat

81. Mr. Saul Ongaria – National Coordinator
82. Ms. Gloria Mugambe – Head of Secretariat
83. Mr. Francis Garvin Okello – Administration Officer
84. Mr. Kanakulya Edwin Kavuma – Compliance Officer
85. Mr. Dan Denis Agaba – Statistician
86. Mr. Edgar Mutungi – Finance Officer
87. Ms. Linda Stacy Nalumu – Communications Assistant
88. Mr. Ignatius Ariho – Information Technology Assistant
89. Mr. Stephen Etyang – Field Assistant
90. Mr. Gordon Muhereza – Office Assistant
91. Ms. Susan Acom – Office Assistant
92. Ms. Gloria Nakimwero – Administrative Assistant

93. Ms. Gertrude Angom – Monitoring & Evaluation Officer
94. Ms. Stella Anyait – Secretary
95. Ms. Victoria Akakikunda – Technical Officer, Communications
96. Ms. Jackline Ensekiriyo – Research Officer
97. Mr. Patrick Epulu – Research Officer
98. Ms. Mutonyi Ruth – Data Management Assistant
99. Mrs. Ninsiima Hellen – Research Officer

Media Team:

100. Mr. John Odyek – New Vision
101. Mr. Asad Mugenyi – Deep Earth
102. Ms. Racheal Amuge – Radio One/Akaboozi
103. Mr. Felix Oketch – Elix News
104. Mr. Sigoa Denis – My World
105. Ms. Ronah Nahabwe – NTV
106. Mr. Henry Gwaase – BBS TV
107. Mr. Nelson Mandela – PML Daily
108. Ms. Elizabeth Kamurungi -Daily Monitor
109. Mr. Musasizi Jesse – NTV
110. Mr. Musisi Andrew – BABA TV
111. Mr. Tenywa Isaac – BABA TV
112. MMs. Namutebi Phiona – Capital FM
113. Ms. Racheal Nakiwala – Bukedde
114. Mr. Ladu Ismail Musa – NMG-U
115. Mr. Jackson Ssebunza – Beat FM
116. Mr. Devon Ssuubi – Observer Newspaper
117. Mr. Rogers Komagum – UBC TV
118. Ms. Nancy Nayonga – New Vision
119. Mr. Ahumuza John Baptist – COU Family TV
120. Mr. Wambi Micheal – Uganda Radio Network
121. Mr. Joseph Kabaale – UCTV
122. Mr. Ndhaye Moses – KFM
123. Mr. Ronald Musoke – The Independent