

Appendix L: Concordance Table

February 2020

Comment Reference	EIS Section	Comment Identification	Comment	ESIA Response	ESIA Section References
General Comments	Executive Summary	A.i.a	Ensure consistency and logical flow in the presentation of information on the project and potential risks/impacts through the report.	<p>Act, Cap 153, 1995; the Environmental Impact Assessment Regulations 1998; the Guidelines for Environmental Impact Assessment in Uganda, 1997; the Environmental Impact Assessment Guidelines for the Energy Sector in Uganda, 2004 and, the Environmental and Social Impact Assessment Guidelines for the Energy Sector in Uganda, 2014 where applicable.</p> <p>The structure of the EIS conforms with national requirements (Annex D2 of the 2004 Energy Sector Guidelines) and good international industry practice.</p> <p>The EIS report is structured such that so that the project description, method, baseline, stakeholder engagement and impact assessment and environmental and social management plan are separate from each other but there are cross references.</p> <p>Consistency and logical flow was verified during quality check when the EIS was finalised.</p>	Section 1
General Comments	Executive Summary	A.i.a.i	There is a disconnect between Chapter 7 (Impact Identification and Evaluation Methodologies) and the previous chapters (2-5).	<p>The structure of the EIS conforms with national requirements (Annex D2 of the 2004 Energy Sector Guidelines) and good international industry practice.</p> <p>Impact assessment in Section 8 followed methodology approach as described in Section 5</p>	Section 1

General Comments	Executive Summary	A.i.a.ii	There was a break in the logical flow between chapters 5 and 6. Ideally, the 'Project Area of Influence and the Baseline conditions' (Chapter 6) should precede 'impact and risk analysis' (chapter 5).	EIS sections follow national requirements and good international industry practice and are: Introduction; Project Background and Description; Alternatives; Legislative, Policy and Administrative Framework; EIS Process and Methodology; Environmental and Social Baseline Conditions; Stakeholder Engagement; Potential Impact Identification and Evaluation - Normal Operations; Potential Impact Identification and Evaluation - Abnormal Operations and Unplanned Events; Environmental and Social Management Plan; Summary and Recommendations; References; Appendices. The EIS report is structured such that Section 6 Environmental and Social Baseline does precede Chapters 8 and 9 on Impact Identification and	Section 1
General Comments	Executive Summary	A.i.a.iii	Recognize that there are local data sources that should be considered exhaustively before reference is made to external sources e.g. the use of internet databases (Chapter 8: Reference to online fish databases, air quality data is not appropriate.)	Local, secondary data sources have been used to inform baseline studies and "external" sources have been used to supplement local data sources where applicable and appropriate. For example local literature and studies have been used to supplement data collected from field surveys for the geology and soils, fauna, habitat and botany baselines. Field surveys, specifically the social and biodiversity surveys, were completed using Ugandan personnel and expertise.	Sections 6 and 7 Section 8, Appendix A1, A4, A5

General Comments	Executive Summary	A.i.b	Consider evaluation the potential drivers of climate change such as greenhouse gas emissions in relation to the project activities other than assessing climate change as proposed in the ToR.	The project contribution to greenhouse gas emissions and hence climate change has been assessed in terms of impacts to national emissions targets.	Sections 6 and 8; Appendix A14
General Comments	Impact Evaluation	A.ii.a	The evaluation and assessment of impacts should be comprehensive enough to cover all identified impacts of the project. (Appendix E should be part of the core document).	All potential impacts have been identified to the extent possible. This has made the impact assessment table very long and hence included in Appendix E. A detailed explanation of the impacts and potential mitigation measures is presented in Section 8.	Section 8; Appendix E.
General Comments	Impact Evaluation	A.ii.b	Some impacts identified in Appendix E as potentially significant were not considered in the ToR for further assessment and mitigation action.	All potential impacts for planned activities and unplanned events have been identified and evaluated as part of the ESIA process. Mitigation actions have been proposed to minimise both significant and not significant impacts.	Section 8; Appendix E.

General Comments	Legal Framework	A.iii.a	<p>Section 1.1 makes reference to the legal framework and Production Sharing Agreements (PSAs) to guide EIA process. However, given that there is a limited access to the PSAs, it is recommended that the EIA process should not be based on the PSAs but rather on the environmental regulatory framework and other national or regional laws.</p>	<p>The EIS has been completed using applicable Ugandan National environmental regulatory legislation and guidelines as the primary reference source for the legislative framework; where appropriate this is supplemented with international standards.</p>	Section 4
General Comments	Alternatives	A.iv.a	<p>There is need to provide for adequate alternatives analysis in line with the EIA guidelines (refer to sections 1.3 and 1.5).</p>	<p>The EIS includes a section on alternatives including routing, siting, technology and construction technologies.</p>	Section 3

General Comments	Alternatives	A.iv.b	Assessment/evaluation of alternatives to certain specific works e.g where it is inevitable to cross fragile ecosystems such as wetlands, rivers, forests among others; provide for alternatives to open cut methods and make use of BAT/BEPs.	Alternatives have been described for project routing, siting, technology and construction technology. For water crossings, the open-cut technique is the preferred option among other alternatives owing to its simplicity and minimal construction footprint. Best practices for minimisation of impacts during open cut crossings, like seasonal avoidance, optimisation of width of RoW, have been considered.	Section 3
General Comments	Waste Management	A.v.a	Describe the different waste streams giving the detailed description of the likely characteristics of the waste including pigging water and hydrotest water, among others across all phases of the project as the scoping report predominantly focuses on construction waste.	Hazardous and non-hazardous waste streams and waste management are described based on the engineering activity completed to date; as engineering progresses waste streams will be further characterised. A waste management plan will be developed to define waste streams for all the types of waste produced by project.	Section 2

General Comments	Waste Management	A.v.b	Evaluate the impacts that may result from waste generated during the project implementation. Waste should be assessed as a potential contaminant of soils and water, among others.	Unplanned release of waste to the environment is assessed in the EIS; typically waste will be managed according to the project Waste Management Plan and there will not be disposal of untreated waste to the environment.	Section 8
General Comments	Waste Management	A.v.c	Propose and develop a robust waste management strategy.	The strategy for dealing with project waste is outlined in the project description.	Section 2
General Comments	Decommissioning	A.vi.a	The decommissioning strategy is not very clear (Section 2.3.5). Aspects related to project decommissioning should be clearly highlighted and the proposed strategy spelt out in the EIA report.	A decommissioning plan for the construction facilities will be developed, which includes a social management component that addresses associated impacts. When pipeline oil shipping volumes diminish to the point that it becomes inefficient to transport oil via the pipeline, then the pipeline will be decommissioned based on Ugandan regulations and standards and international standards and protocols.	Section 2
General Comments	Other reference documents	A.vii.a	The study team should in addition to the documentation listed in the ToR, make reference to: Existing studies on the Kabaale industrial park.	Third party projects included in the Kabaale Industrial Park have been addressed; all available secondary data has been used.	Sections 2 and 8.

General Comments	Other reference documents	Avii.b	The study team should in addition to the documentation listed in the ToR, make reference to: Relevant sectoral EIA guidelines e.g. water sector.	The EIS has been completed using applicable Ugandan National Legislation. Legislation, together with what the legislation means in terms of the project are presented in Table 4.2-1.	Section 4
General Comments	Other reference documents	A.vii.c	The study team should in addition to the documentation listed in the ToR, make reference to: The sensitivity atlas for MFNP.	The sensitivity atlas has been extensively used and referenced.	Section 6; Appendices A1, A2, A3 and A4.
General Comments	Other reference documents	A.vii.d	The study team should in addition to the documentation listed in the ToR, make reference to: The water source protection guidelines, 2013 (MWE).	The guidelines were taken into consideration when establishing project mitigation measures	Section 4
General Comments	Other reference documents	A.vii.e	The study team should in addition to the documentation listed in the ToR, make reference to: The Nabugabo Wetlands system Ramsar Site Management Plan, 2016-2017.	All secondary data relevant to the study area has been used to inform the baseline studies; secondary data is fully referenced.	Section 6

General Comments	Other reference documents	A.vii.f	The study team should in addition to the documentation listed in the ToR, make reference to: Strategic Environmental Assessment for the Albertine Graben, 2013.	The Strategic Environment Assessment (SEA) for the Albertine Graben has informed the ESIA process.	Section 4.
General Comments	Other reference documents	A.vii.g	The study team should in addition to the documentation listed in the ToR, make reference to: Relevant sector plans in consultation with the relevant agencies (e.g. Ministry of Works, Ministry of Agriculture investment plans, DEAPs/SEAPs and Local Government Development Plans to inform and risks/plans).	The different sector plans have been used to inform the ESIA. For example the cumulative impact assessment which has taken into account potential interaction between EACOP and major government infrastructure projects like the standard gauge railway, power projects and major road upgrades	Section 6 Section 8, Baseline Appendices

General Comments	Other reference documents	A.vii.h	The study team should in addition to the documentation listed in the ToR, make reference to: Guidelines for oil and gas operations in wildlife protected areas as issued by Uganda Wildlife Authority.	The guidelines have been used to inform the ESIA process, specifically for Tilenga feeder pipeline.	Section 4, Section 11
General Comments	Other reference documents	A.vii.i	The study team should in addition to the documentation listed in the ToR, make reference to: UWA strategic plan and Murchison falls National Park general Management Plan (GMP). Note that 'UWA GMP' does not exist.	The guidelines have been used to inform the ESIA process, specifically for Tilenga feeder pipeline.	Section 4
General Comments	Other reference documents	A.vii.j	The study team should in addition to the documentation listed in the ToR, make reference to: The Wetland Atlas.	All secondary data relevant to the study area has been used to inform the baseline studies; secondary data is fully referenced.	Section 6
General Comments	Other reference documents	A.vii.k	The study team should in addition to the documentation listed in the ToR, make reference to: Draft Hydrological Year Book, 1978-2014.	The Draft Hydrological Year Book, 1978-2014 is referenced in the baseline to ensure all relevant information has been included.	Section 6; Appendix A

General Comments	Other reference documents	A.vii.l	The study team should in addition to the documentation listed in the ToR, make reference to: The draft air quality standards and the WHO standards.	Both standards have been taken into consideration when drafting the project environmental standards.	Section 6; Appendix A
General Comments	Other reference documents	A.vii.m	The study team should in addition to the documentation listed in the ToR, make reference to: Wetland inventory reports (accessible from the respective districts and Ministry of water and Environment).	Wetland Inventory Reports were reviewed to inform the ESIA process; use was compromised as the reports do not present maps that identify the location of the wetlands being described in the inventory.	No section reference.
General Comments	The administrative units within the project AOI in the local Governments	A.viii.a	To ensure proper consultations, revisit the list of administrative units to ensure that they are correctly documented as some errors were observed (refer to Table 6.3-5).	Stakeholders were selected based on a stakeholder mapping exercise undertaken by EACOP/ Tilenga feeder pipeline ESIA teams as well as the EIS team's experience of consultation. Errors were corrected.	Appendix C
General Comments	The administrative units within the project AOI in the local Governments	A.viii.b	New districts came up effective July 2017 e.g. Kyotera, the ESIA process should consider the new districts.	New districts within the area of influence have been identified and included	No section reference.

General Comments	The administrative units within the project AOI in the local Governments	A.viii.c	Statements related to the operation of the District council should be revisited as some of them are not correct, e.g. the role of district council (Section 6.3.3.9).	Statements have been updated.	Section 6 and Appendix A
General Comments	Other concerns and observations.	A.ix.a	The Wildlife Act, 2000. The phrase 'Wildlife.....benefit to the people of Uganda', it is important to include the phrase '....and the global community'- this is as it is provided in the Act to cater for the tourism aspect.	Noted and included.	Section 4
General Comments	Other concerns and observations.	A.ix.b	The Scoping Report makes reference to 'Minorities' however, there were not identified within the AOI of the project during the scoping.	Noted.	No section reference.
General Comments	Other concerns and observations.	A.ix.c	Section 6.3.3.9: Tourism; Makes mention of 'preservation' not 'conservation' as is the case.	Noted.	No section reference.
General Comments	Other concerns and observations.	A.ix.d	AOI abbreviation used interchangeably for 'Area of Influence' and 'Area of Interest' (Appendix A)	The abbreviation "AOI" has been used throughout the EIS meaning area of influence.	Section 6; Appendix A

General Comments	Other concerns and observations.	A.ix.e	The proposed 'Resource Management Plan' is not clear, there is need to clarify which resources are referred to therein (Chapter 8).	Resources that will be addressed in the Resource Management Plan are described in the ESMP section.	Section 10
General Comments	Other concerns and observations.	A.ix.f	How will the management plans be presented? Are they part of the ESIA submitted to NEMA?	These management plans are part of the environmental and social management plan (ESMP) which describes the parameters to be monitored, performance indicators and monitoring frequency for generic and location-specific potential impacts. The ESMP has been prepared in accordance with all applicable legislation. This consist of an ESMP section with an outline for all the proposed management plans and a Generic and Site-Specific detailed ESMP matrices. In addition to the ESMP included in the ESIA, a separate volume will be submitted that contains the detailed ESMP.	Section 10
General Comments	Other concerns and observations.	A.ix.g	The ToR makes reference to 'administrative framework'/Administrative bodies' (Section 3.2.4, section 8.7.1). It is proposed that this term replaced with 'institutional framework'.	Noted.	Section 4
Specific Comments	Chapter 1 Introduction	B.i.a	(i) Section 1.2: The developer's contact details are not clear; There is need to specify the developer as this is a joint venture project.	The developer is fully described in the introduction to the EIS.	Section 1

Specific Comments	Chapter 1 Introduction	B.i.b	There is need to clarify if the developer for each project (despite the scoping and ToR having been steered by the JV partners) for the Tilenga and EACOP projects is the same.	The developer is fully described in the introduction in the respective EIS.	Section 1
Specific Comments	Chapter 1 Introduction	B.ii	Section 1.4: the proposed methodologies were not aligned with the objectives of the study. Hence difficult to verify if all objectives have been addressed. Align methodologies to objectives.	The EIS has been prepared pursuant to all relevant national legislation and guidance; the objectives, methodology and the legislative and policy framework reflect this. Methodology was developed to reach objectives of the EIS.	Sections 1, 4 and 5.
Specific Comments	Chapter 1 Introduction	B.iii	Section 1.3 Tilenga Pipeline system should minimize interface with Protected areas during design.	During route optimisation the Tilenga feeder pipeline was routed to use the area outside the Murchison Protected Area (Refer to Section 3 Alternatives)	Sections 3 and 8.
Specific Comments	Chapter 1 Introduction	B.iv	Section 1.4 ref. pg 1-6 sub-bullet 6: The statement that 'Not Significant Impacts' will not be assessed and that focus will only be put to assessing only significant impacts is not clear.	Potential significant and not significant impacts have been identified and evaluated as part of the ESIA process and mitigation for both has been documented in the ESMP and the commitments register.	Sections 8 and 10.

Specific Comments	Chapter 1 Introduction	B.v	Table 2.2-2. Core components: the coating yard was not included as part of the project components.	All project components are described; there is no coating yard in Uganda	Section 2.
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	i	Figure 2.2-12: statement that the diesel generators 'can use crude oil' raises concern for instance; Will the emissions be assessed in the EIA? There is need to document how potential emissions will be handled.	There is no power generation in the EACOP portion in Uganda and the Tilenga feeder pipeline. Power is generated at the Tilenga Project CPF and the impacts assessed in the ESIA for the Tilenga Project.	Sections 2 and 8.
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(ii)	Section 2.2.6.1. The statement that associated facilities 'may require EIA' is not true as all associated facilities WILL require EIA>	Associated facilities are not core project components and are not part of the EACOP system or the Tilenga feeder pipeline. However their contribution to cumulative impacts has been identified and assessed as part of the cumulative impacts assessment (CIA) sections. Non-CIA impacts of the AFs are also summarized. It is clarified that Associated facilities will require EIA	Sections 2 and 8.
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(iii)	Section 2.3.2.2; The proposed use of silt fences may not be sufficient in some areas e.g. with sandy soils, there is need to evaluate practicality in such areas.	Erosion control will be responsive to site-specific conditions and assessed on a site by site basis.	Section 8; Appendix G1.

Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(iv)	Section 2.3.2.2: There is need to account for and compensate for the ecosystem services that may be lost.	Compensation is the last step in the mitigation hierarchy applied by the project, and may be applied when other steps (avoid, minimise, restore) are not effective or feasible. Ecosystem services have been identified and evaluated in the assessment of potential impacts on VECs. Mitigation measures proposed to minimize impacts on VECs also will generally minimize impacts on ecosystem services.	Section 8
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(v)	Section 2.3.2.2 Other infrastructure such as camps should be captured under support facilities, as to make the project description clearer i.e. project includes; the pipeline and associated facilities/AGIs, support infrastructure-camps, material storage yards, coating yards etc (much of which is temporal). <u>These support facilities should be subjected to separate ESIA's as they have not been given adequate attention in the scoping report and ToR.</u>	All project components are described; potential impacts have been identified and evaluated; impacts are presented by district where these are location-specific.	Sections 2 and 8.

Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(v) a	Section 2.2.3: Associated infrastructure (waste management, borrow pits and quarries) should be subjected to separate EIA.	Waste management description is included in the project description section. Mitigation measures to reduce impacts arising from waste management were assessed consistently. A waste management plan will be developed to identify the waste streams and refine mitigation measures if required. The plan is to use existing borrow pits and quarries.	No section reference.
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(vi)	Section 2.3.1: There is a need to map out all the rivers, streams and wetlands crossed by the pipelines.	All surface water features including rivers, streams and wetlands within the project area of influence have been mapped and assessed as part of the ESIA process.	Sections 6 and 8
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(vii)	Section 2.3.2.3: Water requirements, need to be specified in regard to the specific water resources for abstraction, as permits may be required.	Provisional water requirements are identified in the project description. Water sources will be confirmed during the preparation of a water supply study as described in the project description however potential water sources were assessed in the ESIA process; water abstraction will be subject to all necessary permits	Sections 2 and 10
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(viii)	Section 2.3.2.9: Makes reference to 'Drivers rest stops'; it is not clear what they are? These should be clearly described (including the proposed amenities and activities to take place at these stops and hence the potential impacts and mitigation measures required).	The project description describes driver's rest stops as: Drivers will be required to take day rest stops every two hours of driving and overnight rest stops every 10 hours of driving. A survey of suitable rest stops along the proposed routes has concluded that existing facilities are sufficient.	Section 2.

Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(ix)	Section 2.3.2.4: Labour: Consider the Gender Policy and gender differentiation for labour requirements.	Gender Policy and gender differentiation for labour requirements is addressed. These will be further considered in the local recruitment and training plan.	Section 6
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(x)	Section 2.3.2.4: Labour: The statement that...'plans are to use the same personnel for EACOP on the Tilenga spread' is not clear, i.e. whether all labour will be moved along the construction spread and whether there will be no use of local labour?	Labour requirements and utilisation are described; specialized labour will move from EACOP to the Tilenga spread and local labour will be sourced independently.	Sections 2 and 6
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(xi)	The EIS should clearly document how the land will be maintained within the RoW during operation and after decommissioning.	Reinstatement and decommissioning is described in the project description.	Section 2
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(xii)	Provide the proposed locations for the AGIs which should minimize interface with fragile ecosystems.	The location of the main AGIs are described, mapped and assessed; impacts resulting from the construction and operation of the AGIs are identified and evaluated. Avoidance of environmental and social sensitive features was considered during identification of AGIs locations.	Sections 2 and 8; Appendix E

Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(xiii)	The project footprint is not clear (2.3.2.5) and should be clearly defined in the EIA report.	The project footprint is described.	Section 2
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(xiv)	Describe the pipeline design exhaustively including; cover material on the pipeline and design of the side of trench, external diameter of the pipe, width of the excavation, placement of the high voltage line.	Pipeline design is described.	Section 2
Specific Comments	CHAPTER II: PROJECT DESCRIPTION	(xv)	Take into consideration the life of the pipeline after 25 years, including possibilities of 'reverse flow' from the coast to serve other proposes/needs.	The current project plan is to decommission the pipeline and the Decommissioning process is described.	Section 2
Specific Comments	CHAPTER III: LEGAL FRAMEWORK	i.a	(i) Make reference to all relevant laws such as among others; Animal Act, Cap 220 as project traverses rangelands,	The EIS has been prepared pursuant to all relevant national legislation; relevant laws including the Animal Act, Cap 220 are presented in the Legislative Framework.	Section 4
Specific Comments	CHAPTER III: LEGAL FRAMEWORK	i.b	(i) Make reference to all relevant laws such as among others; The Investment Code Act,	The EIS has been prepared pursuant to all relevant national legislation; relevant laws including the Investment Code Act are presented in the Legislative Framework.	Section 4

Specific Comments	CHAPTER III: LEGAL FRAMEWORK	i.c	(i) Make reference to all relevant laws such as among others; The Rivers Act 1962 which relates to dredging and hydraulic works on watercourses and will require a permit for that purpose of the DWRM.	The EIS has been prepared pursuant to all relevant national legislation; relevant laws including the Rivers Act 1964 are presented in the legislative framework section.	Section 4
Specific Comments	CHAPTER III: LEGAL FRAMEWORK	(ii)	There is a need to note that two different Permits will be required from the Directorate of Water Resources Management under borehole construction: A drilling permit and permit for water abstraction.	All necessary permits will be obtained. Permits, licences and authorisations required for the project are identified.	Sections 2 and 4.
Specific Comments	CHAPTER III: LEGAL FRAMEWORK	(iii)	Make reference to international standards including ISO 14001, ISO 18001, ISO 9001	Relevant International Management System Standards are presented in the Legislative Framework.	Section 4

Specific Comments	CHAPTER III: LEGAL FRAMEWORK	(iv)	Provide for a systematic flow of the applicable laws. There is need to recognize that the supreme law is the Constitution of the Republic of Uganda, 1995 which forms the basis for other laws.	All relevant national legislation including the Constitution of the Republic of Uganda, 1995 are presented in a systematic flow in the Legislative Framework.	Section 4
Specific Comments	CHAPTER III: LEGAL FRAMEWORK	(v)	The dates of enactment for laws and dates of commencement for the Multi-lateral Environment Agreements/conventions should also be quoted correctly. E.g., The Wildlife Act, Cap 200 of 2000 not 2003 as quoted.	Applicable International Conventions and Agreements are presented in the Legislative Framework.	Section 4
Specific Comments	CHAPTER III: LEGAL FRAMEWORK	(vi)	There is need to make reference to the National Population Policy, National Content Policy, and National Gender Policy and any other relevant policy that has not been cited within the scoping report.	Noted. All Applicable policies have been included in the legislative framework section.	No section reference.

Specific Comments	CHAPTER III: LEGAL FRAMEWORK	(vii)	For the laws under revision, the developer should make reference to provisions in the revised laws that may be relevant to the project and identify aspects that can be incorporated into the project. Consult with the relevant agencies.	Upcoming legislation is accounted for in the Legislative Framework	Section 4.
Specific Comments	CHAPTER IV: STAKEHOLDER ENGAGEMENT	(i)	Also consult with regional offices e.g. a. Water management zones under DWRM to obtain information, b. Lake Mburo NP for the Community hunting areas along the pipeline route in Rakai, governed by the Lake Mburo National Park management.	Stakeholders and the Institutions that were consulted are listed; institutions were selected based on a stakeholder mapping exercise undertaken by EACOP as well as the EIS team's experience of consultation.	Appendix C

Specific Comments	CHAPTER IV: STAKEHOLDER ENGAGEMENT	(ii)	<p>At Local government level, ensure that all the relevant entities are represented in the consultative process at the District, Sub County, Parish and Village. There is need to coordinate stakeholder engagements with the relevant focal persons from the relevant institutions and provide adequate information to guide the process. Contact persons for EIA in the Local Government should be District Environment Office/District Natural Resources Officer while District Community Development Office plays a key role in mobilization of stakeholders/PAPs.</p>	<p>Relevant entities were consulted; stakeholders and the institutions that were consulted are listed. District Environment Officers for all districts crossed by pipeline were consulted. Attendance lists are attached as part of the documentation of stakeholder engagements with local government.</p>	Appendix C
Specific Comments	CHAPTER IV: STAKEHOLDER ENGAGEMENT	(iii)	<p>At national level, ensure all relevant stakeholders are consulted including Ministry of Agriculture, Animal Industry and Fisheries.</p>	<p>Relevant stakeholders were consulted, including Ministry of Agriculture, Animal Industry and Fisheries; stakeholders and the institutions that were consulted are listed in Appendix C.</p>	Appendix C

Specific Comments	CHAPTER IV: STAKEHOLDER ENGAGEMENT	(iv)	Consult with cultural institutions and religious bodies, including their representatives at the lower levels to inform the field baseline surveys (refer to chapter viii) and development of appropriate mitigation actions.	Relevant cultural institutions and religious bodies were consulted. Stakeholders and the institutions that were consulted are listed.	Appendix C
Specific Comments	CHAPTER IV: STAKEHOLDER ENGAGEMENT	(v)	Document the stakeholders consulted during the ESIA and provide a stakeholder engagement plan (cross reference to Section 8.2). The EIS should demonstrate that the stakeholder consultation has been undertaken sufficiently e.g. photographic evidence, attendance registers.	Stakeholders and the institutions that were consulted are listed Appendix C. Photographs and attendance lists are also attached in the appendix.	Appendix C
Specific Comments	CHAPTER IV: STAKEHOLDER ENGAGEMENT	(vi)	Ensure that the stakeholders consulted should be the right entities so as to capture all the issues and design the right mitigation actions.	Stakeholder mapping was undertaken to identify the appropriate stakeholders and the institutions for consultation, which are listed in Appendix C.	Appendix C

Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	(i)	Clearance of right of way may affect primate populations in Wambabya area (Chimpanzees are canopy animals, if the right of way is constructed, it may affect interactions between families). This should be included among the impacts that will be assessed.	Impact on primates, including chimpanzees have been assessed as in the biodiversity part of the EIS.	Sections 6 and 8.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	(ii)	Section 5.3: The EIS should clearly define the proposed pipeline route and identify impacts based upon the route.	The EIS clearly defines the proposed pipeline route and identifies and evaluates impacts based upon the route.	Sections 2, 6 and 8.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	(iii)	Section 5.3: The EIS should consider options for enhancing vegetation regeneration of areas under restoration.	Typically, land will be reinstated to a capability similar to that which existed prior to construction activities.	Sections 2, 6 and 8.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	(iv)	Section 5.3: Consider measures to ensure that the natural flow regime of the water courses is not interfered with.	Measures will be used to ensure that potential impacts to drainage are mitigated.	Sections 2, 6 and 8.

Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	(v)	Residual impacts analysis did not adequately exhaust issues on community and livelihoods (section 5.5)	The ESIA process has addressed all potential impacts that may occur in the project area of influence according to the impact assessment methodology.	Sections 5 and 8.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	vi.a	Impact analysis may maintain the proposed approach (assessment based on VECs), but the mitigation actions should focus on project specific mitigation.	Proposed mitigation has been designed to ameliorate generic type impacts and, location-specific type impacts. A generic impact is an impact that potentially occurs at multiple locations across the project AOI where the VEC and or impact characteristics are similar across those multiple locations. A location-specific impact is a potential impact that may occur at a specific location or, where the sensitivity of a VEC at a particular location warrants generic mitigation as well as additional, location-specific mitigation.	Sections 5 and 8.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	vi.b	Ensure to evaluate impacts of the project explicitly across the different project components e.g. pipelines, AGIs, etc (table 5.5-1) and not amalgamating them together to ease relation of the impacts and mitigation measures to the specific project components.	Potential impacts have been assessed as either generic type impacts or location-specific type impacts.	Sections 5 and 8.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	vi.c	Impacts identification and evaluation was insufficient in relation to spillages and biodiversity (Table 5.5-1). This should be addressed in the EIS.	Impact identification and evaluation with regard to spillages and biodiversity have been fully accounted for in the ESIA process.	Sections 8 and 9.

Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	vi.d	As part of the biodiversity VEC assessment, evaluate potential stress on animals/wildlife (make reference to studies undertaken in MFNP).	Potential impacts to fauna and avifauna of conservation importance have been assessed and evaluated in the context of a pipeline project where the linear disturbance is of relatively short duration compared to a field development project. Relevant studies performed for MFNP and wider area were considered.	Sections 6 and 8 and; Appendix C.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	(vii)	Evaluation of socio-economic VEC should incorporate potential impacts on productivity and crime rates (potential increase or decline) and management of anxiety (Table 5.5-1).	The identification and evaluation of potential impacts on the socio-economic VEC has included livelihood, social cohesion and civil services such as primary healthcare and policing.	Sections 6 and 8.
Specific Comments	CHAPTER V: KEY PROJECT IMPACTS AND RISK ANALYSIS	(viii)	Assess potential for biodiversity offsets and how this can be implemented (cross reference to Section 7.2.4).	In concordance with IFC PS6 guidance a Biodiversity Action Plan incorporating enhancement and conservation measures will be developed and implemented, to achieve net gain for critical habitat and no net loss for other biodiversity features (including natural habitat).	Section 8.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ii.a	The EIA should exhaustively map water bodies impacted by the project.	All water bodies identified to be in the project area of influence have been assessed as part of the ESIA process.	Sections 6 and 8.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ii.b	The EIS should document the geo-reference points for all rivers/wetlands crossed by the pipeline and document the crossing point for Nkusi-Kafu river.	Locations of water-course crossings are described.	Section 6

Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ii.c	The assessment of water quality should incorporate total coliforms and <i>E. coli</i> and nutrient parameters e.g. for AGIs as standard analyses (Section 4.3.1).	Water quality surveys were carried out and the results of these surveys including the coliforms and nutrient parameters are included in the EIS.	Section 6; Appendix A6
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ii.d	Capture information on water quality and quantity for water bodies within the project AOI in consultation with DWRM and the local governments.	Baseline information that is required to complete comprehensive impact assessment according to Ugandan national requirements and good international industry practice has been recorded. DWRM were consulted as part of the stakeholder engagement process and also as part of the separate water source study.	Section 6; Appendix C.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ii.e	The evaluation of the VEC focuses on water quality and availability for community use and makes no reference to potential diversion of the water flow e.g. during 'open cut construction'. This should be taken into consideration and ensure that it is addressed.	All potential impacts on this VEC including the effects of open cut construction have been assessed.	Section 8.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ii.f	The assessment should also take into consideration that other uses such as availability for water for hydropower plants.	Project-related impacts on water availability were assessed. All potential sources of cumulative impact have been identified and evaluated in the ESIA process.	Section 8.

Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(iii)	There is focus on the pipeline route as compared to associated facilities, for the retrospective VECs (soils, archaeology, water). There is need to provide information on the footprint/AOI for all the project components likely to impact each VEC.	All potential project related impacts that could occur within the area of influence have been assessed where relevant for each VEC as part of the ESIA process; the area of influence includes the project footprint of pipeline corridor and AGIs.	Sections 6 and 8.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(iv)	Section 6.3.3.6: Air quality and climate change: There I need to separate 'air quality' and 'climate change'. The scope of climate change consideration has not been clearly defined, therefore for purposes of capturing contribution of the project and associated facilities to climate change, the study may focus on GHG emissions.	Air Quality and climate change are addressed as two seperate disciplines in the EIS	Sections 6 and 8.

Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	v.a	Threatened species identified in the project AOI do not include the Elephant and Giraffe in Bugungu Wildlife reserve and fish species which may exist in the rivers that form part of the L. Albert and Victoria catchments. There is need to note that Giraffes were introduced to the southern bank of MFNP while more information on fish can be obtained from the Frame Survey of 2012, and Catch Survey of 2012.	Noted.	No section reference.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	v.b	There is focus on threatened species of animals and not plants. This should be captured in the EIS.	The EIS has fully accounted for vascular plant species of conservation importance.	Sections 6 and 8; Appendix A1.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(vi)	Section 6.3-9: All vulnerable groups including widows should be considered.	All vulnerable groups within the relevant VEC area of influence have been accounted for in the ESIA process.	Sections 6 and 8; Appendix C.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	vii.a	Reference is made to Wambabya FR (pg 6-14) but omitted Kairo-Tonya WR in the AOI.	All potential impacts that could occur within the area of influence have been identified and evaluated where relevant for each VEC as part of the ESIA process; the area of influence includes the project footprint of pipeline corridor and AGIs. Kairo-Tonya WR is considered outside of the AOI.	Sections 6 and 8; Appendix A.

Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	vii.b	The methods for sampling the biodiversity VEC should be explicitly documented in the EIS and the samples should be representative enough of the various ecosystems/habitats.	Samples representative of various ecosystems/habitats were collected. The methodology used to gather baseline information addressing both secondary and primary information is fully documented in the biodiversity Appendix.	Section 6; Appendix A.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(viii)	Geographical references should be factual e.g. Figure 6.3.1 indicated a site 'Bugaya West' in Buliisa which is located in Hoima District.	Noted.	No section reference.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ix.a	The baseline information should be backed up with relevant statistical data. Statements such as '....intensive poaching in Bugungu WR...' (pg 6-11) should be backed up with facts.	Baseline information is referenced.	Section 6; Appendix A
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	ix.b	Statistical data on air quality was provided but with no references/data sources (section 6.3.3.6). These should be provided.	Baseline information is referenced.	Section 6; Appendix A.

Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	x	The scoping report predominantly focuses on indirect impacts (pg 6.2) and makes little reference to direct impacts from permanent and temporary footprints.	Potential impacts have been fully characterised in the EIS as direct, indirect and induced as well as in terms of magnitude, duration, extent and the sensitivity of the VEC.	Section 8; Appendix E.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(xi)	The scoping report provides the AOI range of 300m for assessment of impacts of noise and vibration, however, experience from road construction and blasting of rock activities has indicated that persons/settlements within 500m can equally be affected especially if isolated on hills. Therefore the EIA should revisit this range.	The AOI considered in the impact assessment is 500 m and the study area is extended to 1 km around PS1 and PS2; blasting during construction is not required in Uganda.	Section 6 and Appendix A10.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(xii)	Indicate the administrative boundaries of key VECs whenever possible in the text for ease of understanding	Administrative boundaries have been referenced where-ever practical in the EIS.	Section 6; Appendix A11

Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(xiii)	Ensure that the EIS captures adequate information on geology along the pipeline route and its associated infrastructure (section 6.3.3.1).	Geology within the project area of influence and, the geotechnical studies that have been used to inform the selection of the pipeline route are fully described in the EIS.	Sections 3 and 6; Appendix A5
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	xiv.a	The EIA should take into consideration existing and planned government infrastructure e.g. water related investments along the pipeline AOI e.g. water supply systems and power plants.	All potential sources of cumulative impact have been identified and evaluated in the ESIA process.	Section 8; Appendix H.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	xiv.b	The EIA should take into consideration existing and planned government infrastructure e.g. the proposed standard gauge railway.	All potential sources of cumulative impact have been identified and evaluated in the ESIA process.	Section 8; Appendix H.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	xiv.c	The EIA should take into consideration existing and planned government infrastructure e.g. any other linear infrastructure within the AOI.	All potential sources of cumulative impact have been identified and evaluated in the ESIA process.	Section 8; Appendix H.

Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(xv)	EIA should provide soil classification along the AOI of the project.	Soil classification is fully documented.	Section 6; Appendix A5.
Specific Comments	CHAPTER VI: PROJECT AREA OF INFLUENCE AND EXISTING BASELINE CONDITIONS	(xvi)	Provide topographic mapping along the AOI - this can inform estimates of cut, fill or spoil material that may be generated/required.	Studies completed to facilitate the development of the project, the use of remote sensing and, engineering field visits completed are described in the EIS.	Section 3.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(i)	Section 7.2.3.2 & 7.2.3.3 (Spatial and temporal boundaries). The CIA should cover a broader scope beyond the proposed 6 months particularly in relation to projects under central and local government. This should be done in consultation with relevant MDAs to incorporate the planned projects. Also make reference to sectoral investment plans.	All potential sources of cumulative impact have been identified and evaluated in the ESIA process; information gained through stakeholder engagement was used to inform the assessment of cumulative impacts.	Section 8; Appendices C and H.

Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(ii)	assessment for the soils VEC should consider other potential impacts on soil disturbance beyond potential pollution/contaminati on (section 7.3.2.1). Impacts such as erosion should be factored into the scope.	All potential impacts, including erosion, that could occur within the area of influence have been assessed where relevant for each VEC as part of the ESIA process; the area of influence includes the project footprint of pipeline corridor and AGIs.	Sections 6 and 8; Appendix G1.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(iii)	Cumulative impact assessment on surface water sources (section 7.3.2.2) should go beyond the aspects of water quality and water for communities, and encompass 'other water uses' within the project AOI.	All potential sources of cumulative impact have been identified and evaluated in the ESIA process.	Section 8; Appendix H.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(iv)	The assessment of landscape (section 7.3.2.4) should go beyond the visual impacts. Issues such as landslides on escarpments/the structural integrity of the landscape should be studied.	All potential project related impacts that could occur within the area of influence have been assessed where relevant for each VEC as part of the ESIA process; the area of influence includes the project footprint of pipeline corridor and AGIs. The ESIA describes the studies completed, remote sensing utilised and engineering field visits completed in order to design out the potential for project related land-slide.	Sections 3, 6 and 8.

Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(v)	Assessment of air quality (section 7.3.2.5) needs to recognize that here is meteorological data that is locally available that should be incorporated into the assessment beyond the data from Eldoret.	Monitoring of air quality was completed at PS1 and PS2 and data obtained to inform the impact assessment. Local sources of data were not required for the air quality assessment as there were not considered to be substantive emissions sources as to require dispersion modelling.	Sections 6 and 8; Appendix A9
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(vi)	The assessment of ecosystem services (section 7.4.1) should clearly define the ecosystem services that are going to be evaluated.	Ecosystem services are identified and evaluated.	Sections 6 and 8; Appendix A.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(vii)	Risks associated with the project (section 7.4.2: Accidental events) should be clearly identified and mitigation measures suggested. Also assess the other potential emergencies that can occur such as fires at the AGIs.	Potential impacts resulting from planned, project activities; abnormal operations and unplanned events are fully identified and evaluated.	Sections 8 and 9.

Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	viii.a	In regard to transboundary impacts: should capture issues of HIV/AIDS, oil spills, spill over impacts (either –ve or +ve)(section 7.2). This should be addressed in the ESIA.	Community health is fully addressed. Potential impacts resulting from abnormal operations and unplanned events are fully identified and evaluated. Potential transboundary impacts are identified and evaluated.	Sections 8 and 9.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	viii.b	In regard to transboundary impacts:: proposed use of the Transboundary Environmental Assessment Guidelines by EAC (section 7.2.4). The study should also refer to other regulatory tools beyond East Africa because of the trans boundary issues e.g. Nile basin Initiative.	All potential transboundary impacts as well as, all potential sources of cumulative impact, have been identified and evaluated in the ESIA process.	Section 8; Appendix H.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	viii.c	In regard to transboundary impacts:: consultations need to be done to harmonize related studies in the impacted countries in the project AOI.	Stakeholders that were consulted are listed; stakeholders were selected based on a stakeholder mapping exercise undertaken by EACOP as well as the EIS team's experience of consultation. Transboundary impacts were discussed in the meetings with relevant stakeholders (for exampe, with Nile Basin Secretariat)	Appendix C

Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(ix)	Explicitly describe the biodiversity assessment tools as section 7.3.1 documents different tools from those indicated in chapter 8.	The methodology used to gather baseline information addressing both secondary and primary information is described. The methodology used to evaluate potential, likely impacts is described.	Sections 5, 6 and 8; Appendix A.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(x)	The assessment did not consider below ground biodiversity (section 7.3.1)	Potential impacts on Stygofauna have been identified and evaluated.	Section 8; Appendix A.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	(xi)	The assessment did not consider water demand requirements (section 7.3.2) and its impacts on water resources.	The EIS describes the project water requirements and the studies that are being completed in order to identify sustainable sources.	Section 2.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	xii.a	In regard to the socio-economic assessment, there is need to document: How the impacts arising from influx of people would be assessed and mitigated?	Potential impacts arising from influx have been assessed with regard to the relevant VEC in terms of direct and indirect potential impacts.	Section 8; Appendix E.
Specific Comments	CHAPTER VII: IMPACT IDENTIFICATION AND EVAULATION METHODOLOGY	xii.b	In regard to the socio-economic assessment, there is need to document: The methodology for assessing socio-economic VECs (section 7.3.4).	The methodology used to establish the baseline socio-economic conditions is described. The impact assessment methodology is described.	Sections 6 and 8; Appendices A11 and E.

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(i)	Stakeholder concerns raised the issue of HIV/AIDS spread, the ESIA should document commitments on non-fraternization and other social safeguards (refer to section 8.3.2.2: Influx). In addition, Appendix A should highlight HIV/AIDS as part of the VEC evaluation on community health (pg A-13).	Stakeholder concerns regarding HIV/AIDS were addressed during the consultation exercise. Community health, including HIV/AIDS, has been fully addressed in the baseline and impacts and mitigation sections.	Sections 6 and 8; Appendices A11 and C.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(ii)	Stakeholder concerns reflect that the persons consulted did not adequately understand the concept of the 'heated pipeline' (section 8.3.2.4 Community Health and Safety). The stakeholder consultations should be comprehensively done to capture all aspects of the project and sufficient information given in order to obtain buy-in from all relevant stakeholders.	Continous stakeholder consultations have been conducted to educate stakeholders on the project and on the concept of a 'heated pipeline'. Stakeholder concerns regarding "heated pipeline" were addressed during the consultation exercise. Stakeholder consultation was comprehensive; stakeholder consultation was completed after a stakeholder mapping was undertaken by EACOP together with input from the EIS team's experience of consultation.	Appendix C

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(iii)	Assessment of impacts on biodiversity (section 8.3.3) should include potential impacts of animal kills/deaths as a result of traffic and excavations, and clearly document commitments to minimize these impacts on biodiversity.	All potential project related impacts within the area of influence have been identified and evaluated; appropriate mitigation is recorded in the commitments register.	Sections 8 and 10; Appendix E
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(iv)	ESIA should document how potential impacts from obstruction of natural flows of water (sub-surface flow and surface water) from pipeline construction will be mitigated (section 8.3.4). The ESIA should establish the relationship between the upstream and downstream water courses (connectivity) so as to among others, inform the design of the pipeline appropriate mitigation measures to ensure continuous flows.	All potential impacts and mitigation, including that addressing ground water and surface water, is documented.	Sections 8 and 10; Appendix E

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(v)	Provide factual and not speculative information with appropriate statistics e.g. air quality, soil contamination, poaching statistics. Dependence on online fish databases is not recommended.	All baseline information is referenced where relevant.	Section 6; Appendix A.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	vi.a	During the ESIA, the field sampling (refer to Section 8.4 and Table 8.4-1) should include: methodology for collection of data on biodiversity, and the frequency of data collection.	The methodology used to: select sample locations; identify the number of sample-site visits; identify the season of sampling; complete sampling; species recording and; species identification are described.	Section 6; Appendix A.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	vi.b	During the ESIA, the field sampling (refer to Section 8.4 and Table 8.4-1) should include: criteria for selection of the proposed sampling locations, number of water sources sampled and duration for indicative sampling for water resources (flows).	The methodology used to: select the number of sample locations, the sample locations and; identify the duration of sampling are described.	Section 6; Appendix A.

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	vi.c	During the ESIA, the field sampling (refer to Section 8.4 and Table 8.4-1) should include: seasonal and permanent wetlands.	Seasonal and permanent wetlands in the project AOI are included.	Section 6; Appendix A.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	vi.d	During the ESIA, the field sampling (refer to Section 8.4 and Table 8.4-1) should include: traffic assessment in Lwengo town as the proposed pipeline route crosses Mbarara-Masaka highway in Lwengo town council.	Potential impacts on the Mbarara-Masaka highway as a result of the pipeline crossing have been identified and evaluated in the EIS. The Mbarara-Masaka highway will not be used by the project for construction related traffic.	Sections 6 and 8, Appendix E.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(vii)	There is need to assess impacts of the project on the aquatic ecosystems (flora and fauna) beyond fish (Ref; pg 8-14).	Potential impacts on aquatic biodiversity have been assessed.	Section 8; Appendix A.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(viii)	Color water to be included	Surface water baseline information includes recording of water colour.	Section 6; Appendix A6.

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(ix)	In regard to the VEC on avifauna, explore locally available data sources beyond birdlife international, such as data with Wildlife Conservation Society and Nature Uganda.	Local, secondary data sources have been used to inform all baseline studies and "external" sources have been used to supplement local data sources where applicable and appropriate. Field surveys, specifically the social and biodiversity surveys, were completed using Ugandan personnel and expertise.	Section 6; Appendix A.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(x)	During the ESIA process, there is need to seek guidance and authorization from the relevant authorities to undertake the fish surveys. Consult with the National Fisheries Research Institute and Directorate of Fisheries Resources.	Noted.	No section reference.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(xi)	The proposed ESIA schedule (section 8.6) seems unrealistic given the timelines provided. This schedule may need to be revisited to ensure that the quality of work is not compromised	The EIS process has followed Ugandan national requirements and good international industry practice; a technically robust EIS has been completed using subject matter experts and a project management team with a proven track record of successfully delivering similar EISs.	No section reference.

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xii.a	The ESIA should: document baselines on any existing alien and invasive species within the project area of influence in consultation with National Agricultural Research Organization (make reference to Appendix E and Section 8.3.3); with a view of avoiding the spread of these species or the introduction of others.	Detailed mapping of Alien Invasive Species is beyond the scope of EIS however. A biosecurity plan will be developed and implemented that includes a strategy for weed and pest control and measures to prevent the introduction or spread of alien invasive species on the right-of-way, work sites and camp facilities. The biosecurity plan will also outline specific measures to protect the aquatic environment from alien invasive species.	Section 10
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xii.b	The ESIA should: assess potential habitat and wildlife disturbance by wildfires.	Wild fires are not a planned or unplanned activity of the EACOP project. The hazard of fire has been addressed in the design and planning of the EACOP project.	Sections 2 and 9.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xii.c	The ESIA should: assess the likelihood of potential human- wildlife conflicts and propose appropriate mitigation measures.	Potential impacts resulting from human-wildlife conflicts have been assessed in the ESIA process and appropriate mitigation has been presented.	Section 8.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(xiii)	Consult with the Uganda Bureau of Statistics (UBOS) on parameters for measuring standard of living.	Information from the Uganda Bureau of Statistics (UBOS) has informed the EIS and is referenced.	Section 6; appendix A

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xiv.a	In regard to the assessment of ecosystem services (section 8.4.11) there is need to: identify and justify ecosystem services that will be assessed per VEC and the methodology for assessing each as the proposed application of a questionnaire may not be adequate to evaluate all ES.	Ecosystem services have been identified and evaluated according to the relevant VEC.	Sections 6 and 8; Appendix A.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xiv.b	In regard to the assessment of ecosystem services (section 8.4.11) there is need to: ensure that comprehensive views are obtained from the relevant stakeholders.	Stakeholders that were consulted are listed in Appendix C; stakeholders were selected based on a stakeholder mapping undertaken by EACOP as well as the EIS team's experience of consultation. Attendance register and feedback from the stakeholders is included in the appendix.	Appendix C.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xv.a	The Project (section 8.8) should incorporate: a clear grievance handling mechanism and management plan.	The Environmental and Social management Plan and the commitments register identifies the requirement for a grievance mechanism: The project will implement grievance procedure to provide opportunities for project-affected communities to express grievances about construction and commissioning related activities. The grievance procedure will also be used to record the reporting and investigation of claims of physical or economical damage due to project activities. Grievance handling mechanism is explained in details in Section 7.	Section 10, Appendix E

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xv.b	The Project (section 8.8) should incorporate: decommissioning plan (cross reference to section 1.4.1)	Decommissioning is described to the level of detail known at current stage. Overview of Decommissioning plan is presented in Section 10.	Section 2.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(xvi)	The management plans should be developed in consultation with the relevant lead agencies while proposing practical and feasible actions.	Noted.	No section reference.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xvii.a	In regard to the assessment on Archaeology (section 8.3.4.4): the thirteen features identified during the scoping phase that may be impacted by the project should be clearly documented in the EIS.	The thirteen features that were identified during the scoping phase that may be impacted by the project are documented in the EIS.	Section 6; Appendix A.
Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	xvii.b	In regard to the assessment on Archaeology (section 8.3.4.4): the field baseline surveys should include opinion and cultural leaders among stakeholders to be consulted.	Relevant cultural institutions and religious bodies were consulted.	Appendix C

Specific Comments	CHAPTER VIII: TERMS OF REFERENCE	(xvii)	Critical habitats should be clearly defined, identified and assessed in the EIS (Section 8.4.1.2).	A critical habitat assessment has been completed as part of the ESIA process.	Appendix B
Specific Comments	C: ESIA TEAM	(i)	By Ugandan law, environmental practitioners are liable for work undertaken. Consequently, RSK as a limited liability company may not be held liable for the work presented but rather the individual practitioners that are certified by this authority.	Noted. Registered practitioners from Eco & Partner Consults were actively contributors in all the stages of the ESIA process.	No section reference.
Specific Comments	C: ESIA TEAM	(ii)	Only practitioners registered and certified by NEMA should undertake the ESIA.	Noted.	Section 1
Specific Comments	C: ESIA TEAM	(iii)	A waste management specialist has not been included and therefore should be on the team.	A waste management specialist is included in the EIS and project teams.	No section reference.
Specific Comments	C: ESIA TEAM	(iv)	The ESIA team is biased towards hydrogeology with limited expertise in hydrology. The team should incorporate Hydrologist.	Noted.	No section reference.

Specific Comments	C: ESIA TEAM	(v)	<p>Prioritize national expertise wherever available and the international expertise should only fill the gaps e.g. stakeholder engagement and noise lead person.</p>	International expertise has been used to supplement and support the work completed by the Ugandan national consultants Eco and Partner for the EIS.	No section reference.
<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2018</p>	1: Main Review Findings	1	<p>The Scoping report and TOR for the EISA is generally well written, well structured, contains most of the required elements, has good maps and graphics, which increases comprehensiveness. The report is readable and in line with international practice with respect to approach and methodologies.</p> <p>In view of the very short timelines indicated for the completion of the ESIA process for the project, it is recommended that the ESIA should aim at:</p>	Noted	No section reference.
<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2019</p>	1: Main Review Findings	(i)	Meeting legal requirements as part of the Ugandan permitting process.	Noted	Section 4

Provided by letter Ref: NEMA/4.5, dated 19 th September 2020	1: Main Review Findings	(ii)	Focus very effectively on the key issues with respect to social and environmental impacts.	Noted	Section 8
Provided by letter Ref: NEMA/4.5, dated 19 th September 2021	1: Main Review Findings	No Number	The review process nonetheless noted that the ESIA scoping report had several shortcomings and recommends that the gaps should be incorporated in the ToR and addressed during the ESIA and preparation of the report. Sections 2-3 below discuss these issues in more detail.	Noted	No section reference.

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2023</p>	<p>2. Key Priority Areas</p>	<p>(i)</p>	<p>The ESIA should address the following key areas besides the scope identified in the ToR: Land use disturbance/damage: The ESIA report should provide a clear description of the potential extent/magnitude of disturbance and displacement of persons/settlements including compensation. A well communicated compensation scheme should be provided in the RAP that should be part of the ESIA process.</p>	<p>Potential impacts to land use have been identified and evaluated. A Resettlement Policy Framework is described in Section 8 and included in Appendix K.</p>	<p>Section 8; Appendices A and J</p>
<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2024</p>	<p>2. Key Priority Areas</p>	<p>(ii)</p>	<p>The ESIA should address the following key areas besides the scope identified in the ToR: Access restrictions: The ESIA should determine the extent to which access will be restricted (temporarily or permanently). The ESIA/RAP should provide measures to mitigate the impact of any access restrictions.</p>	<p>Potential impacts on Social and Biodiversity VECs have been identified and evaluated.</p>	<p>Sections 6 and 8.</p>

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2025</p>	<p>2. Key Priority Areas</p>	<p>(iii)</p>	<p>The ESIA should address the following key areas besides the scope identified in the ToR: A transparent and realistic plan with respect to increasing/boosting potential benefits of the project should be documented. For instance the labour requirements of the project should be document and any other undertakings such as investing money in corporate social responsibilities (CSR), could be encouraged but should be done in consultation with the relevant government/local authorities.</p>	<p>Labour requirements and utilisation are described in the EIS. Benefits and local content is described. Social related projects needed to minimise project impacts are described.</p>	<p>Section 2.</p>
--	---	--------------	---	---	-------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2026</p>	<p>2. Key Priority Areas</p>	<p>(iv)</p>	<p>The ESIA should address the following key areas besides the scope identified in the ToR: Management of project personnel: Concrete plans for the management of the project workforce should be provided including fraternization restrictions to mitigate socioeconomic risks/impacts on the communities in the project area and prohibition of hunting in areas within/adjacent to protected areas.</p>	<p>Potential impacts resulting from construction activities including workforce are identified and evaluated. Mitigation measures on management of project workforce are described in the EIS.</p>	<p>Sections 8 and 10</p>
---	----------------------------------	-------------	---	--	--------------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2027</p>	<p>2. Key Priority Areas</p>	<p>(v)</p>	<p>The ESIA should address the following key areas besides the scope identified in the ToR: Whereas social issues should be presented in the ESIA, the report should demonstrate how these concerns have been taken into consideration. The Resettlement Action Plan should be developed and submitted alongside the ESIA report to provide a better understanding of how these issues have been handled.</p>	<p>All potential impacts resulting from the EACOP project have been identified and evaluated as part of the ESIA process; the Resettlement Policy Framework is described in Section 8 and included in Appendix K.</p>	<p>Sections 6 and 8; Appendix J.</p>
--	---	------------	---	---	---

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2028</p>	<p>2. Key Priority Areas</p>	<p>(i)</p>	<p>Disturbance of local hydrology and hydrogeology: The ESIA should provide clear descriptions of how the pipeline construction will be undertaken without causing significant (geo)hydrological changes, for instance in wetlands and other areas with vulnerable water conditions. Mitigation measures should be provided for all impacts that cannot be avoided.</p>	<p>The construction methods, including methods to cross surface waters and maintain drainage, are described.</p>	<p>Section 2.</p>
---	----------------------------------	------------	---	--	-------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2029</p>	<p>2. Key Priority Areas</p>	<p>(ii)</p>	<p>Disturbance of soils and landscapes: The ESIA should demonstrate that any disturbances to soils and landscapes for the project will be mitigated effectively. In particular, the procedures of work along the escarpment wall, managing excavated soils and site rehabilitation after the construction stage should be documented.</p>	<p>The construction methods, including soil management and erosion control, are described. Mitigation addressing soil management and control of erosion are documented.</p>	<p>Sections 2, 8 and 10; Appendix E</p>
<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2030</p>	<p>2. Key Priority Areas</p>	<p>(iii)</p>	<p>Impacts of noise, vibrations and dust: Clear avoidance/mitigation measures should be documented to manage nuisance arising from project activities..</p>	<p>Mitigation is fully documented for each VEC on which the nuisance will potentially impact.</p>	<p>Sections 8 and 10; Appendix E</p>

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2031</p>	<p>C: Biodiversity</p>	<p>(i)</p>	<p>Impacts on biodiversity: The ESIA should clearly provide the extent of the ecosystems that will be disturbed and the duration of the disturbance, particularly habitats for species of conservation concern (like the chimpanzee) and migration routes, linking project activities to potential impacts on biodiversity. Concrete measures to prevent/minimize unnecessary disturbance should be documented. The ESIA should propose a monitoring plan of key elements of biodiversity, which are most vulnerable to the disturbance.</p>	<p>Potential impacts, including those to ecosystem services, have been fully characterised in the EIS with specific emphasis on species of conservation importance. The proposed ESMP is documented.</p>	<p>Section 8; Appendix E.</p>
---	------------------------	------------	--	--	-----------------------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2032</p>	<p>D: Incidents and Emergencies</p>	<p>(i)</p>	<p>The Albertine rift area and sections of the proposed route are prone to seismic activity which poses risks to the pipeline. The ESIA should assess and provide measures to address risks (such as geohazards, sabotage, spills, explosions, etc). Potential environmental and social consequences of these risks with regard to the pipeline should be addressed and the EIS should clearly indicate how these risk have been integrated into the design.</p>	<p>The route selection process aimed to design out risk is documented. Potential impacts resulting from planned, normal construction and operations and, abnormal operations and unplanned events have been identified and evaluated as part of the ESIA process.</p>	<p>Sections 2, 3 8 and 9</p>
--	--	------------	--	---	------------------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2033</p>	<p>D: Incidents and Emergencies</p>	<p>(ii)</p>	<p>A clear project description and evaluation should be provided in regard to safeguards (developed in compliance to National Legislation and International Standards), in the event of force majeure/pipeline failure/spills that could arise during the implementation of the project, so as to demonstrate the effectiveness of these safeguards.</p>	<p>Measures to maintain and monitor the integrity of the pipeline and AGIs are described in the EIS. An emergency response plan will be developed.</p>	<p>Sections 2 and 10.</p>
<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2034</p>	<p>E: FEED-ESIA- FID Correlation/Inte raction</p>	<p>(i)</p>	<p>It is important that the ESIA aspects inform the Front End Engineering and Design (FEED) and Financial Investment Decision (FID) for this project. The developer should demonstrate that the ESIA and its recommendations are integrated into the FEED and FID.</p>	<p>Noted. The ESMP and the commitments register describe the mitigation that will be required to inform detailed design and the management of construction and operation activities. The EIS has been completed as an iterative process with the FEED team. Recommendations from EIS were integrated into construction contracts documentation.</p>	<p>Section 10; Appendix E</p>

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2035</p>	<p>3. Other Observations</p>	<p>i</p>	<p>Provide a clear description of the entire project (1145km) to give a good understanding of the development by regulatory entities so that decisions/compliance requirements are not considered in isolation but rather with hindsight of implications to the entire project.</p>	<p>The EACOP System is fully described in the EIS and presents sufficient information to identify and evaluate potential project impact, pre- and post mitigation, cumulative impacts, transboundary impacts.</p>	<p>Section 2.</p>
<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2036</p>	<p>3. Other Observations</p>	<p>ii</p>	<p>The ESIA for Tilenga feeder line should make reference fo the Strategic Environment Assessment (SEA) for the Albertine Graben and adhere to the applicable recommendations of the SEA.</p>	<p>The Strategic Environment Assessment (SEA) for the Albertine Graben has informed the ESIA process.</p>	<p>Section 4.</p>

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2037</p>	<p>(iii) Institutional framework and procedural requirements</p>	<p>iii</p>	<p>Whereas reference is made to many international conventions and agreements, the obligations and requirements of these conventions to the pipeline are not highlighted. The ESIA should provide the linkage and requirements of the pipeline project with these conventions, many of which have not been domesticated yet. There is need to revise the scope to those relevant to the</p>	<p>The EIS has identified the application of relevant international conventions to the EACOP project.</p>	<p>Section 4.</p>
---	--	------------	---	---	-------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2038</p>	<p>(iv) Public and lead agency involvement</p>	<p>iv (a)</p>	<p>There is insufficient attention given to the social issues during the scoping exercise and the ToR are similarly lacking in terms of the ESIA strategy to address the social concerns such as livelihoods, use of the Right of Way (ROW), unrealistic expectations (e.g. employment available to locals), land use rights, and compensation among others. Clear strategies to address/manage social issues should be provided in the ESIA report.</p>	<p>Potential impacts have been fully characterised in the EIS, especially considering livelihood, land-use, acces, etc and, appropriate mitigation is described.</p>	<p>Section 8; Appendix A11.</p>
--	--	---------------	--	--	--

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2039</p>	<p>(iv) Public and lead agency involvement</p>	<p>iv (b)</p>	<p>Not all relevant groups were identified and consulted during the scoping. The proposed stakeholder engagement plan referred to in chapter 8 should be comprehensive for the EIA process and the entire project cycle. This should include marginalized groups such as women and the elderly and entities that may influence the project such as Members of Parliament.</p>	<p>Stakeholders that were consulted are listed; stakeholders were selected based on a stakeholder mapping exercise undertaken by EACOP as well as the EIS team's experience of consultation. Community engagements included consultations with marginalised groups such as women and elderly.</p>	<p>Appendix C.</p>
---	--	---------------	---	---	--------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2040</p>	<p>(v) Evaluation of Impacts</p>	<p>v</p>	<p>The ESIA should go beyond evaluation of direct impacts and consider potentially significant indirect impacts arising from the project such as, the opening up of areas which may cause bigger and long-term environmental, social, demographic and biodiversity impacts. The EISA should or instance clearly show where new temporary and permanent access roads will be constructed as a result of the project. Similarly, the potential residual impacts from the implementation of this project should be identified and addressed during the ESIA.</p>	<p>Impacts have been fully characterised in the EIS as direct, indirect and induced as well as in terms of magnitude, duration, extent and the sensitivity of the VEC. Residual impacts have been characterised, quantified and assessed. Temporary and permanent roads have been assessed.</p>	<p>Section 8.</p>
--	---	----------	---	---	-------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2041</p>	<p>(vi) Management and Monitoring Plan</p>	<p>vi (a)</p>	<p>While extensive baseline studies have been proposed, the potential impacts of the project should be emphasised and the correlation between the project and the baseline should be clear. The need for baseline studies also depends on the actual design of the project activities, and its interference with the pristine environment of existing anthropogenic activities.</p>	<p>The area of influence and associated study area for each VEC is described.</p>	<p>Section 6 and Appendix A.</p>
---	--	---------------	---	---	--------------------------------------

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2042</p>	<p>(vi) Management and Monitoring Plan</p>	<p>vi (b)</p>	<p>A comprehensive management and monitoring plan for the project should be developed indicating the capacity requirements (logistical and human resource) and associated costs (for instance increased management costs of Protected Areas) to implement the plan. This should be done in consultation with the relevant lead agencies. The rationale behind the monitoring program should be clear and it should be demonstrated that it is effective to address environmental and social concerns of the project. For instance, the rationale behind the surface water and ground water monitoring programs</p>	<p>The proposed ESMP is described.</p>	<p>Section 10 and ESMP</p>
--	---	---------------	--	--	---

<p>Provided by letter Ref: NEMA/4.5, dated 19th September 2043</p>	<p>(vi) Management and Monitoring Plan</p>	<p>vi (c)</p>	<p>While a number of management plans have been proposed, the ESIA should document which management plans or actions therein are applicable to specific sections of the pipeline and associated activities/projects.</p>	<p>Proposed mitigation has been designed to ameliorate generic type impacts to an acceptable level and, location-specific type impacts to an acceptable level; location-specific mitigation has been described in terms of the location along the pipeline and the characteristics of the potential impact. A generic impact is an impact that potentially occurs at multiple locations across the project AOI where the VEC and or impact characteristics are similar across those multiple locations. A location-specific impact is a potential impact that may occur at a specific location or, where the sensitivity of a VEC at a particular location warrants generic mitigation as well as additional, location-specific mitigation. These generic and location-specific mitigation measures will inform the development of the construction management plans and the operational management plans. This is reflected in the EIS ESMP.</p>	<p>Sections 5, 8 and 10.</p>
---	--	---------------	--	---	------------------------------