



## Oil palm development in Buvuma

*Learning from previous experiences and  
recommendations for future developments*

**POLICY SYNTHESIS PAPER**

## Executive summary

This synthesis paper informs the planned oil palm expansion in Buvuma. It draws on documented experiences from Uganda and especially Kalangala district, and highlighting the possible threats, pressures and impacts in Buvuma, and offering strategies and recommendations to mitigate these.

The evidence points to concerns regarding increases in poverty and food insecurity, deforestation and land degradation, abuse of land rights and tenure inequalities, and issues related to the resulting in-and-out migration. Five main conclusions were drawn. The first is that the sustainability of oil palm production requires building on the positive and transformative socio-economic impacts achieved under the Vegetable Oil Development Project (VODP), during the National Oil Palm Project (NOPP) that will have four hubs including Buvuma. The second is that sustainable oil palm production requires environmentally sound practices with consideration for agroforestry and conservation agriculture at a larger scale. Thirdly is that responsible oil palm production should be guided by reputable sustainable certification schemes, coupled with routine compliance checks and audits by ministries, departments and agencies to ensure adherence to international best practices and national laws. Fourth is to avoid the exploitation of smallholders, promote competition in the sector, and create investment opportunities for Ugandan businessmen. Finally, there is a need to set minimum wages, acknowledge the true value of land rent or sale, and enforce stringent mechanisms for compliance with laws, standards and best practices.

Seven recommendations for the government were proposed: (i) adhere strictly to the Environmental and Social Impact Assessment, with NEMA and ministries to undertake regular monitoring, and environmental audits, respectively; (ii) develop and implement land use policies and plans in addition to the Physical Plan; (iii) investigate and implement financing and supportive policies that encourage diverse options, including intercropping with food and cash crops; (iv) break the BIDCO/OPUL monopoly by inviting other private sector players and especially Ugandan businesses; (v) ensure legal representation to those living on the land and the prompt issuance of certificates of occupancy by relevant government agencies; (vi) develop and rollout an effective and timely communication action plan to guide community decision making; and (vii) conduct a comprehensive gender impact assessment also highlighting concerns of child labour.

In Buvuma, 11,000 hectares of oil palm will be established, with 3,500 hectares to be planted and managed by outgrowers. Future decisions must ensure that lessons learnt are applied in Buvuma during the NOPP (2019-29), to minimise the observed negative economic, environmental and social implications that have followed industrial-scale oil palm development in the past.

# 1. Introduction

In a bid to diversify agribusiness in the country, the Government of Uganda introduced oil palm in Kalangala district in 2002, with plans to establish plantations in Buvuma district starting in 2019. The investment was to cost more than US\$400 million to the Vegetable Oil Development Project (VODP), from the International Fund for Agricultural Development (IFAD) to Business and Industrial Development Corporation (BIDCO), part of Oil Palm Uganda Ltd and partly owned by Wilmar International Ltd. VODP aimed to contribute to sustainable poverty reduction in the project area by increasing domestic production of vegetable oil and its by-products, raising rural incomes for small-holder producers, and ensuring the supply of vegetable oil products to Ugandan consumers and neighbouring regional markets.

Whereas the industry has an attractive investment model, oil palm development has led to negative social, economic and environmental impacts in the project area. Identifying and analysing these impacts in terms of scope/scale, intensity, sensitivity, significance, severity and risk, became a necessity in a bid to establish mitigation arrangements to avoid their reoccurrence in the proposed oil palm expansion hubs. Studies were undertaken in July-August 2018 and involved a review of documentation, key informant interviews and focus group discussions in project sites, with supplemental field observations. Detailed findings have been documented in independent interdisciplinary research findings by Bigirwa et al. (2019), Kakungulu-Mayambala and Tibugwisa (2019), Masiga et al. (2019), Mwima et al. (2019) and Nangendo et al. (2019), as well as edited notes by Ssemmanda and Opige

(2018, 2019). These studies were undertaken to provide a deeper understanding of the socio-economic and environmental impacts of oil palm developments on Kalangala, in part, to ensure that good practices are replicated in Buvuma, while negative impacts are avoided. These studies are thus summarised with the objectives of: a) pre-empting threats, pressures and impacts of oil palm expansion in Buvuma, b) highlighting diversions from the original project design, c) suggesting sustainable oil palm production options and d) making recommendations that benefit the environment and people. They are intended to inform the implementation of the new ten-year National Oil Palm Project (NOPP). The line ministry, MAAIF and relevant Departments and Agencies, their counterparts in District and Lower local governments, project proponents and the proposed oil palm host communities are particularly key to implementing the recommendations.

Oil palm production has benefitted the national economy through import substitution, foreign exchange savings and improvement to local economies. But research findings have showed that this has come with trade-offs, and there is growing concerns over environment and social conflicts, land tenure conflicts, changes in ecosystems and associated ecosystem services, for which a reflection is needed before expanding oil palm in new hubs. Furthermore, much could be achieved by undertaken environment and social impact assessments and adhering to national policy and legal frameworks, international conventions, standards and best practices.

## 2. Buvuma district in the context of oil palm production

Buvuma is an island district comprising entirely of islands in Lake Victoria, with the main economic activities being fishing, logging and charcoal production, but is characterized by scarcity of safe and clean water, increasing levels of deforestation and forest degradation and lack of sustainable energy supply among others. The district is also one of the expansion hubs for oil palm plantations that were planned to begin in 2019.

However, as a newly created district, it lacks a comprehensive land use plan to guide rural and urban development and expansion of social services and infrastructure. The district has a steady population growth of 6.25%, which is one of the highest in the country (BDLG, 2013). Over 60% of the total population of 89,655 is on the main Buvuma island as it is more conducive for agriculture than the smaller islands (UBOS, 2016).

### Box 1: A proposed oil palm model for implementation in Buvuma

The NOPP proposes to create inclusive rural transformation through oil palm investments, and what this entails is balancing in equal proportions, economic, ecological and social spheres of the sustainability model. In order to achieve that, the following is proposed.

1. **An investment model led by Ugandans** – in this case multilaterals, bilateral, development partners and banks target support to Ugandan investors to establish core estates and mills, whilst supporting stakeholders with funds for investment, equipment and tools. This investment model allows reinvestment within the country, with ripple benefits as opposed to repatriation of profits to countries of origin.
2. **Promoting integrated oil palm agroforestry systems** in Buvuma that blend productivity and environmental sustainability. These offer socially, economically and environmentally feasible alternatives to monoculture systems, and have proved successful in Brazil, Malaysia and Indonesia. This involves intercropping with other tree species and/or crops such as beans, maize, cassava, dairy goat rearing (Awaludin, 2004), and cattle production among other options.
3. **Encouraging certified oil palm production models.** Certified sustainable palm oil and palm kernel oil are produced from oil palm plantations that have been independently audited and certified against principles, criteria and indicators agreed upon by the Roundtable on Sustainable Palm Oil (RSPO) standard. This can balance economic, social and environmental concerns that have emerged from Kalangala and that should not be repeated in the extension hub of Buvuma.
4. **Oil palm production based on Strategic Environmental Assessments** as provided for by the National Environment Act, 2019, for projects that could potentially impact whole landscape such as the proposed oil palm plantations in Buvuma.

Oil palm plantations are expected to occupy 11,000 hectares; 7,500 of which being the nucleus estate, while 3,500 hectares will be cultivated by outgrowers. For that reason, land has become a precious commodity on the market; 30% of land owners (including those with user rights) on the main island have sold their land and moved to mainland districts of Mayuge, Mukono, Buikwe, Jinja, Bugiri and Kamuli (IFAD, 2017), while others have indicated their interest to join the outgrower scheme. Since 2015, there are also demographic changes and population movements in and out of the islands. Semmanda and Opige (2019) indicate that more than 70% of the population in Buvuma are not original inhabitants, and the recent mass acquisition of land for oil palm leaves less land for farming, and more than 100 hectares of wetland has already

been converted to grow rice. Not only has the vegetable oil development project displaced people, but has also impacted on livestock, and in 2017 alone, the district lost more than 13,000 animals as farmers left.

With the loss of farmland, it is expected that levels of malnutrition will increase and social problems will emerge, such as family break-downs, gender-based violence, prostitution and the spread of diseases among labourers along with the loss of livelihood options and opportunities. The environment will also be subjected to increased vulnerabilities and stresses, with an increased inability to provide ecosystem services. With no resettlement plan for those displaced, and labourers moving in for casual jobs, this will add pressure on the limited space remaining.



Charcoal bags waiting to be ferried from Buvuma to main land

### 3. Lessons from oil palm production globally

In West Africa, where oil palm is native, it is grown and harvested in an environmentally-friendly way by smallholders who undertake small scale and diversified agroforestry. Whereas these farmers do not use modern agronomic practices, medium-scale producers farming 10 to 500 hectares do use such practices including cover cropping, fertilization, ring weeding and pruning among others (FAO, 2002). Some medium-scale farmers also own processing facilities and often buy produce from neighbouring farmers who face marketing problems during the peak season when fruit is abundant.

But governments, multilateral funding institutions, the private sector including the private banks along with bilateral donors, support and promote only the large-scale agro-industrial model (Tauli-Corpus et al., 2007). The nucleus estates

claim to be well run and maintained, employing the best environmentally sensitive farming techniques, and employ highly skilled professionals to work their operations. They have become the fastest growing monoculture plantations in tropical Africa, Asia-Pacific, Latin America and the Caribbean.

The world over, oil palm development has destroyed forests. There were 106,000 hectares of oil palm plantations in the 1960s, but by 2005, production reached 30 million tonnes from 12 million hectares, including 4 million hectares in Malaysia and 5.3 million in Indonesia (Sheil et al., 2009). By 2015, Indonesia's oil palm plantations alone already covered 9 million hectares, with 26 million hectares projected for 2025.

#### Box 2: Lessons and policy pointers

1. In West Africa, smallholder farmers use environmentally sound practices and no fertilizers. Outgrowers in Buvuma should be encouraged not to wholly adopt modern agronomic practices that leave a large environmental footprint.
2. In West Africa, smallholder farmers use diversified agroforestry practice, and so could outgrowers in Buvuma, growing indigenous trees and food crops alongside oil palm.
3. There are local medium scale operators from West Africa who own mills. In Buvuma, the local private sector should be supported to establish processing plants for different products (palm oil, bio-diesel, among others) to meaningfully benefit in line with the local content policy.
4. There are marketing problems especially at times of bumper harvests. Since there will be only a single buyer in Buvuma, it is important that outgrowers are protected from exploitation arising from market dynamics, by allowing local investors to join the trade.
5. Oil palm brings large profits ensured by cheap labour, low cost of sale or rent of land, ineffective environmental controls, high demand, support from multilateral and bilateral donors and a short growth cycle. There is need to set minimum wages, value for money in land rent or sale, and stringent mechanisms for compliance with laws, standards and international best practices.

To justify the loans given to oil palm plantation owners, oil palm developers claim that oil palm will generate more employment, alleviate poverty, promote higher living standards and promote environmentally sensitive agricultural production (Brown and Jacobson, 2005), but these claims are highly contested.

The main reasons for the rapid expansion of oil palm plantations are the big profits to owners which are ensured by cheap labour, supported by the low cost of sale or rent of land, ineffective environmental controls, high demand, support from multilateral and bilateral donors, and a short growth cycle (Tauli-Corpuz, et al., 2007). In addition, the crop is also geared for the export market which generates foreign exchange. The increasing demand for biofuels and the need for

carbon sinks plus the system of carbon emissions trading are the new incentives for further expanding oil palm plantations (Tauli-Corpuz and Tamang, 2007).

Expansion of the oil palm hub in Buvuma needs to note that whereas growth of the oil palm sub-sector has resulted into economic benefits, it comes with serious social and environmental costs which adversely impact on indigenous peoples, local communities, flora and fauna and remaining tropical rainforests.



Oil palm trial plot in Buvuma

## 4. Threats, pressures and impacts of oil palm expansion in Buvuma

### Threats

Based on lessons from different parts of the world and from Kalangala district in Uganda, it is evident that expansion of oil palm development in Buvuma presents the following threats.



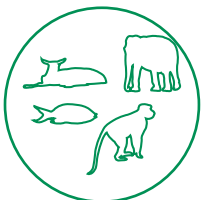
#### Deforestation

This is done to make way for oil palm plantations at the expense of biodiversity, ecosystem services and livelihoods. It is a threat in Buvuma because habitat destruction will impact wildlife.



#### Competing land uses

Conversion of agricultural land for oil palm production threatens food security and livelihoods of communities since plantations replace land used for growing cash and food crops (e.g. cassava, maize, banana, sorghum, among others).



#### Wildlife access to palm fruits

When oil palm covers large areas, species that feed on raw oil palm nuts (pigs, vervet monkeys) will have an abundant source of food and tend to increase in population beyond what can be controlled, and those that do not feed on oil palm will gradually disappear, which is a potential threat in Buvuma and a huge potential conservation issue in the islands.



#### Pollution

Use of pesticides and herbicides pose potential threats to aquatic and terrestrial ecosystems, the quality and quantity of freshwater is threatened, and the productivity potential of soils is affected.



#### Potential occurrence of fires

Oil palm cultivation has been accompanied by massive fires during land clearance and land preparation, causing health problems for humans and threatening biodiversity.





## Land rights and tenure inequalities

The process of acquiring land in Buvuma by the Uganda Land Commission did not observe the principle of free, prior and informed consent. A comprehensive Resettlement Action Plan (RAP) should have been developed to guide compensation for squatters on public land. Rights of private mailo land owners (a tenure system from when the kingdom of Buganda signed an agreement with the British-administered Uganda Protectorate in 1900), bibanja holders (bona fide occupants, being squatters who have user rights) and licensees were not observed to the fullest and the Uganda Land Commission was seen to create leaseholds in favour of Oil Palm Uganda Limited (OPUL), adding to conflicts centred on tenure rights and inequalities.



## Displacement of people

In Buvuma there have already been major changes in the population due to land acquisition, even before any plantations have been established. Half of the island's subsistence farming land is to be replaced by oil palm, and large out-migrations have already occurred, while newcomers arrive in search of new opportunities, in total contrast to the project's objective of improving the livelihood of local people.

## Pressures

The main pressures are largely socio-economic



## Demand for palm oil and its related products worldwide.

Palm oil is the most commonly produced vegetable oil for use in the food industry and non-food uses including shampoo, cosmetics, cleaning agents, candles and toothpaste. This is a pressure leading to increased demand for production as global demand for palm oil is expected to double by 2020.



## Demand for bio-fuels

Biofuels are still expected to represent over 90% of total renewable energy consumption in road transport by 2022 (backed by policies that seek to cut use of fossil fuels). Biofuel production is expected to grow by more than 16% during and over the forecast period, meaning opportunities for the National Oil Palm Project (NOPP) but also more forest clearance for rapid expansion oil palm plantations and extra pressure on land resources.



## Population growth

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## High levels of poverty

Displacement of people has contributed to an increase in domestic violence and family neglect, with women and children often the victims since land belongs to men. This has resulted in many cases of family abandonment.

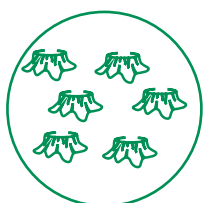
## Impacts and strategies for future action



### Environment and social impacts in general terms

The anticipated impacts are diverse, as detailed in the Environment and Social Impact Assessment (ESIA) study for the oil palm project. The question to answer is whether they were analysed in depth, and that appropriate mitigation measures need to be proposed with plans for implementing such measures.

**Strategy:** The National Environment Management Authority and the District Environment Office fast-tracks and monitors compliance to the implementation of the Environment and Social Management and Monitoring Plan (ESMMP) provided under the ESIA.



### Deforestation and land degradation

In Buvuma, subsistence farmland has been acquired for oil palm plantations, and all unprotected forest patches and individual trees will be cleared. Like in Kalangala, where encroachment on the statutory 200 m buffer strip between oil palm plantations and major water bodies has taken place, it is feared that the same will happen, since 54% of the buffer zone in Buvuma is already subsistence farmland. This will accelerate vegetation loss, land degradation, biodiversity loss and associated negative impacts

**Strategy:** Introduce agroforestry and conservation agriculture approaches (e.g. intercropping), and reduce use of herbicides and pesticides by both outgrowers and in the nucleus estate.



### Weather, climate and climate change

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### Poverty and food insecurity

If Buvuma is to meet the projected land requirements for oil palm development, the land available for agriculture will be reduced by 50%, with the remaining land being rocky outcrops, marginal grassland, wetlands and protected forests with hardly any land left for food production. Negative indirect impacts on fisheries by pollution from fertilizer run-off and sedimentation of the lake will further compound the problem of poverty and food insecurity.

**Strategy:** The Ministry of Lands, Housing and Urban Development must develop a land use plan to guide developments, with CSOs supporting resilience building through community-based land use plans, striking a balance between wealth creation and food security. Buvuma District Local Government should develop and implement a Physical Plan to guide both rural and urban development balancing production, settlement, conservation and livelihoods. NEMA should make greater efforts to monitor compliance with national laws, standards, guidelines and international best practices.



## Abuse of rights

In Buvuma, oil palm production is driving land acquisition of large blocks of land, frequently linked with problems related to tenure systems (land owners and squatters) and land-use rights, including community access rights to services such as cultural/traditional shrines, access to water wells and springs, collection of non-timber forest products such as mushrooms and rattan, resulting in the exploitation of local communities, restricted access and abuse of human rights.

**Strategy:** The District Local Government of Buvuma to develop a communication action plan to sensitise stakeholders about rights, including legal, social, or ethical principles on freedom of entitlement.



## Biodiversity and ecosystem services

Oil palm development in Buvuma should learn from experiences and lesson from Kalangala and other parts of the world, where palm oil production tends to reduce water and soil quality, and adversely affects local communities which are dependent on ecosystem products such as food and medicines, and ecosystem services such as regulation of the hydrological cycle and soil protection provided by the forests and the biodiversity therein.

**Strategy:** Outgrowers and the main nucleus estate should adopt and conform to certification standards to ensure the credibility of palm oil sustainability claims., being produced without causing harm to the environment or society, and providing assurances to consumers. The Ministry of Agriculture, Animal Industry and Fisheries as well as CSOs should adopt the Roundtable on Sustainable Palm Oil (RSPO) certification standard.



## Socio-economic benefits as impacts

In Buvuma, these could include poverty alleviation and long-term employment opportunities. Sharing of profits among outgrowers and amongst family members can provide further incentives, attracting more workers and more outgrowers to the sector, along with better living and working conditions. Depending on the role played by authorities and cooperatives, smallholders can benefit more from oil palm production due to higher returns to land and labour, compared to other commonly grown agricultural products.

**Strategy:** The Ministry of Water and Environment, through a Land Use Dialogue approach should conduct an assessment of competing land uses and develop a Landscape Management Plan, detailing the needs of different sectors, their roles and responsibility, and the need for joint planning to strike a balance between sustainable ecosystems, forests and forest resource, impacts of development on the environment, and the vulnerabilities of communities.

## 5. Economic trajectories of oil palm development

Projections of direct impacts from oil palm incomes and agricultural production, and the indirect impacts on food security and forest-based ecosystem services for Buvuma district showed a medium to long term decline in economic welfare under the proposed system of oil palm production (Masiga et al., 2019). In Buvuma, the net economic contribution of oil palm is projected to decline from between UGX 5.6 and 12.4 billion/year (US\$ 1.5-3.4 million) in 2019, to between UGX -4.4 and +10.1 billion/year (US\$ -1.2 to +2.8 million) by 2030. With high population density and a large area under subsistence farmland, loss of agricultural production, and livelihoods, followed by food

security, are the main factors expected to limit the economic benefits associated with oil palm in Buvuma. The other factor is the lack of skilled labour limiting employment opportunities to casual labour only.

The above projections do not consider the total economic valuation of the ecology and its related impact to the investment. Loss of vegetation brings into play losses associated with changes in microclimate that may impact on the costs of irrigation, and ecosystem stress, costs related to vulnerability, and climate change variability would further the decline if included in the business model.



Wood to be sold and transported from Buvuma to main land

## 6. Diversions from the original project design

Based on documented experiences, a number of diversions from the original project design are proposed (see also Box 1), relating to the following concerns.

1. **Migration.** Contrary to the original objective of improving the livelihoods of local people, it is immigrants that may end up benefiting since large out-migrations and especially of those compensated for loss of land have already happened, while newcomers are arriving in search of new opportunities.
2. **Indigenous peoples and gender inequalities.** Whereas the original project intention was to reduce poverty among the local poor and vulnerable communities, the experience in Kalangala district has shown that only 7% of employees are native, and only 37% of the 1,810 oil palm outgrowers are female. Currently, 70% of the population in Buvuma are migrants (Ssemmanda and Opige, 2018; 2019).
3. **Selective financing priorities.** In Buvuma, oil palm is not the best nor only option to improve farmer incomes since increasing the production of crops such as cassava, beans, sweet potato, rice and coffee, are also viable options. Experience from Kalangala shows that due to the monopoly in oil palm, the buyer offers low prices due to the lack of alternative players.
4. **Skewed communication and education.** Oil palm development presents positive, sometimes exaggerated, impressions that pay little attention to the environmental, social and economic impacts and disparities. In Buvuma, only 30% of the population are optimistic about the project, while 70% have mixed feelings about its benefits (Masiga, et al., 2019), largely because the associated social and economic disparities caused during implementation are not communicated.
5. **Limited livelihood options.** There is a fear that the current outgrower model will not permit the growing of alternative food crops, and intercropping is not possible in the current recommended spacing by OPUL, making it difficult to diversify farming options.
6. **Future forecasting.** Economic forecasts show that oil palm is profitable for outgrowers, smallholders and large companies in the short term, but that returns decline in the long run as ecosystem services are lost, alongside growing demands to ensure food security increase, and oil palm development in Buvuma should be cognisant of this.

## 7. Towards sustainability

As indicated earlier, sustainability in oil palm development hinges on consolidating the positive and transformative socio-economic impacts achieved under the Vegetable Oil Development Project (VODP), as Uganda rolls out the National Oil Palm Project (NOPP) that will have four hubs in the country including Buvuma, originally slated to begin in 2019.

In addition, it is critical to track changes in land use, soil quality, biodiversity, water quality and socio-economic indicators. Land use conversion from forest to oil palm is perhaps the most important criterion when evaluating environmental sustainability, and the following, are some of the approaches that will guide sustainable oil palm production in Buvuma. Best practices and lessons learnt:

1. **Sustainable certification schemes.** This is one way to protect vulnerable communities, framed around compliance with applicable laws and regulations, and commitment to transparency, long-term economic and financial viability, use of appropriate best practices by growers and millers, and environmental responsibility and conservation of natural resources and biodiversity. There is therefore a need to pursue certification schemes such as the Roundtable of Sustainable Palm Oil (RSPO) and Rainforest Certification Alliance as recognized frameworks for sustainability in oil palm production.
2. **Reduction of emission from deforestation and forest degradation (REDD+).** Uganda already has a national REDD+ strategy, which offers financial incentives to reduce emissions from forested lands and to invest
3. **Palm oil, timber and carbon offset (POTICO) approach.** This is where firms agree to restrict sustainable oil palm expansion to already degraded lands, avoiding forest patches which are then certified for forestry. This would ensure that oil palm plantations could keep expanding to meet demand, and generate local revenues and jobs, while also limiting deforestation. Unfortunately, this is often not the case, as developers target the exploitation of timber as a subsidy to offset investment costs.
4. **Monitoring and regulatory frameworks.** This is necessary to achieve sustainable management of oil palm production, but it requires NEMA and the Ministry of Agriculture, Animal Industry and Fisheries to be vigilant in monitoring compliance to laws and related regulations.
5. **Inclusivity of smallholder farmers.** NOPP has a goal to create inclusive rural transformation through oil palm investment, and it should be seen to be doing so. However, to ensure that activities meet global standards of sustainability and inclusiveness, and with donors increasingly aware and critical of bad practices in commodity production and trade with a need for environmental and social protection, it is important for the government and partners to consider recommendations from independent research.

## 8. Conclusions

1. Sustainability in oil palm hinges on consolidating the positive and transformative socio-economic impact achieved under the Vegetable Oil Development Project (VODP) into the National Oil Palm Project (NOPP), that will have four hubs including Buvuma. NOPP aims at inclusive rural transformation through oil palm investment and is aligned to national policies and development goals enshrined in the National Development Plan (NDP III), emphasizing public-private-producer partnerships.
2. Sustainable oil palm production will require environmentally sound practices with consideration for agroforestry and conservation agriculture at a larger scale.
3. Responsible production of oil palm, guided by reputable sustainable certification schemes and coupled with routine compliance checks and audits by ministries, departments and agencies is the only way to advance since it fosters adherence to international best practices and national laws.
4. To minimise exploitation of smallholder producers and to be able to promote competition, it is important to provide investment opportunities in the sector for Ugandan businessmen.
5. Oil palm plantations bring profits to owners ensured by cheap labour, low cost of land, ineffective environmental controls, high demand, support from multilateral and bilateral donors, and a short growth cycle. There is a need to set minimum wages, acknowledging the true value of land rent or sale, and enforcing stringent mechanisms for compliance with laws, standards and best practices.

## 9. Recommendations

1. Strict adherence to Environmental and Social Impact Assessment (ESIA) recommendations will avert negative impacts, so OPUL and outgrowers must adhere to proposed mitigation measures as detailed in the Environment and Social Management and Monitoring Plan (ESMMP). NEMA and the District Environment Officer must also undertake mandated regular monitoring and compliance checks, and the MWE and the MAAIF must undertake regular environmental audits to instil continuous improvement along the project implementation pathway.
2. Develop and implement land use policies/plan as well as the Physical Plan. These guide land use planning amidst competing needs from different sectors, and help to curb irregularities that can lead to food insecurity, deforestation and land rights issues, and guide both rural and urban settlement developments. Prior to the roll out of oil palm in Buvuma, a comprehensive Resettlement Action Plan should be developed by the developer with close supervision from the DLG. Based on the physical plan, local health, education and water services must have the necessary resources to then meet the expected demand from the expected population influx.
3. The government should investigate and implement financing investment options that emphasize a diversity of alternatives, such as growing food crops alongside the intended agrocommodity. Interested farming communities should be supported by such projects to maintain livelihood diversification, curb food insecurity and increase the resilience of local communities.
4. The government needs to break the BIDCO/OPUL monopoly by inviting other private sector players and especially Ugandan businesses, to the new hubs to facilitate competition, fair pricing and marketing.
5. Ensure legal representation to those living on the land and the prompt issuance of certificates of occupancy by relevant government agencies. Certificates of occupancy must be issued, based on procedures provided for under laws that guarantee ownership and access/user rights, ensuring that land ownership is transferred on a 'willing buyer/willing seller' basis, and in observance of the principle of free prior and informed consent. This will help reduce current and future conflicts over land.
6. Develop and rollout an effective and timely communication action plan in line with the commitment to transparency in the oil palm industry, to communicate project intentions to stakeholders, and provide unbiased information both positive and negative using appropriate channels to guide decision making at community level.
7. Conduct a comprehensive gender impact assessment to guide gender-based transformative approaches alongside equity and equality for men, women, girls and boys, highlighting concerns of child labour and gender disparities in a labour-intensive project of this nature.



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