

Tilenga Project Uganda

Social Performance Advisory for Tilenga Project Resettlement: RAPS 2-5

Missions # 1-4 Consolidated Report

Version - 11

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DECEMBER 2025

LAND AND PEOPLE PLANNING LTD. / INTERFACE CONSULTING (“CONSULTANT TEAM”) GENERAL NOTES

Title: Social Performance Advisory for Tilenga Project Resettlement: RAPS 2-5

Client: TotalEnergies EP Uganda

Date: December 31, 2025

Office: TotalEnergies EP Uganda

Status: Missions 01 - 04: Consolidated Report

Consultant Team Review: Jason Petrunia, Task Team Lead

Version: 11 – Final Report – December 31, 2025

ABBREVIATIONS AND ACRONYMS

Abbreviation / Acronym	Definition
ADP	Agricultural Development Program
AGSS	Agricultural Support Services
CGM	Concerns and Grievance Mechanism
CGV	Chief Government Valuer
CIDI	Community Integrated Development Initiative
CLO	Community Liaison Officer
CoD	Cut-off Date
CSV	Comma-separated values
CTR	Contractor
DIRCO	District Resettlement Committee
DOA	Delegation of Authority
EACOP	East African Crude Oil Pipeline
ED	Economically Displaced
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FLT	Financial Literacy Training
GBV	Gender-based Violence
GCALA	Government of Uganda Guidelines for Compensation Assessment under Land Acquisition
GMP	Gender Management Plan
IEC	Information, Education and Communication
IFC	International Finance Corporation
JV	Joint Venture
KYP	Know Your PAP
LARF	Land Acquisition and Resettlement Framework
LC	Local Council
LIME	Livelihood, Monitoring and Evaluation
LRP	Livelihood Restoration Program
MEMD	Ministry of Energy and Mineral Development
MLHUD	Ministry of Lands, Housing and Urban Development
NGO	Non-governmental Organization
NTV	Notice to Vacate
PAC(s)	Project Affected Community(ies)
PAH(s)	Project Affected Household(s)

PAP(s)	Project Affected Person(s)
PAU	Petroleum Authority of Uganda
PD	Physically Displaced
PS	International Finance Corporation Performance Standard
RAP	Resettlement Action Plan
RAS	Rapid Aerial Survey
RPC	Resettlement Planning Committee
SEA	Social and Environment Assessment
SES	Socio-economic Survey
SMP	Social Management Plan
TEPU	TotalEnergies EP Uganda
TUOP	Tullow Uganda Operations Pty

EXECUTIVE SUMMARY

1.0 PURPOSE AND SCOPE OF THE REPORT

This report represents the key findings and conclusions of the Social Performance Advisory services conducted by Land and People Planning Ltd. and Interface Consulting Ltd. (the “Consultant Team”) in support of land acquisition, resettlement, and livelihood restoration for TotalEnergies EP Uganda’s (TEPU) Tilenga Project (or the “Project”).

The report provides a comprehensive third-party assessment of land acquisition, resettlement, and livelihood restoration activities undertaken by the Project for Resettlement Action Plans (RAPs) 2-5, benchmarked against the voluntary commitments set out in the Project’s Land Acquisition and Resettlement Framework (LARF) and RAPs, which correspond to International Finance Corporation (IFC) performance standards (PS), particularly PS 5 on Land Acquisition and Involuntary Resettlement. The assessment draws on four field missions conducted between 2024 and 2025 and is intended to assess implementation of LARF and RAP commitments, identify remaining gaps, and support closure of the Project’s resettlement program. RAP 1, which covered the Project’s Priority Areas (Industrial Area and N1 Access Road), was not part of this review - RAP 1 concluded in 2021. And that the review covers only RAP 2-5 which began in 2022.

2.0 ASSESSMENT CONTEXT AND RESETTLEMENT OVERVIEW

RAPs 2-5 collectively represent a large and complex resettlement program implemented across Bullisa, Hoima and Kikuube districts and project components. The Project acquired approximately 2,108 acres of primarily agricultural (e.g., crop and grazing) land, resulting in impacts to 4,954 Project Affected Persons (PAPs), 205 (4%) of whom experienced physical displacement requiring replacement housing, while 4,749 (96%) experienced only economic displacement linked primarily to loss of livelihood resources.

Resettlement planning commenced in 2016 with development of the LARF, followed by a pause in Project activities between October 2019 and resumption of some RAP processes in August 2020. The RAPs were disclosed in March 2021, followed by signing of compensation agreements, receipt of compensation payment, delivery of replacement housing, issuances of Notices to Vacate, replacement land, and rollout of livelihood restoration programs. As of the date of this Report, compensation, replacement house handover, including rectification of defects, and the majority of livelihood mitigations have been completed. The Project is now well positioned to transition toward RAP closure.

3.0 ASSESSMENT FINDINGS AND RECOMMENDATIONS

The Consultant Team’s assessment of the Project’s performance against the commitments set out in the LARF and RAPs 2-5 is structured around core components of the resettlement program, including compensation and entitlements, livelihood restoration, vulnerable support programming, grievance redress, engagement and disclosure, gender mainstreaming, and monitoring and data management. Across these core areas, the findings indicate that the Project has implemented the resettlement program in a manner broadly consistent with LARF and RAP principles (which are in turn aligned with IFC PS5), with no material systemic deficiencies identified. Remaining recommendations focus on consolidation, documentation, targeted follow-up, and alignment of the RAP closure requirements.

3.1 Compensation and Entitlements

Compensation and entitlement delivery formed the foundation of the Project's resettlement effort. It provided the mechanisms to identify eligible PAPs, measure impacts to land and property, and deliver compensation at full replacement value using both cash and in-kind options. The Consultant Team's findings confirm that the core compensation commitments are being met.

Key Findings

As of December 2025¹, the Project indicated it had paid compensation to 4,927 PAP according to their compensation agreement. The Project also indicated that it has placed payment in ESCROW for 27 PAP who have not yet signed their agreement. All 205 physically displaced PAPs received replacement houses, and 29 households have received replacement land (with the exception of 1 PAP, as noted in Section 2.5), in accordance with eligibility and preference criteria².

Aside from asset identification, verification of procedures confirmed that the compensation process followed key RAP and IFC PS5 principles, including cadastral surveys, market valuation approvals by the CGV, and formal disclosure of agreements. The Project also implemented both primary and secondary CoDs to help manage speculation (see Section 4.1.4.1). The entitlement packages offered a choice of compensation options (i.e., in kind (land for land; house for house) or cash compensation) and met the core procedural requirements for fairness and transparency.

Review of outstanding grievances and field-reported concerns confirmed that most of these that are compensation-related have been addressed through existing Project mechanisms. Remaining concerns are primarily linked to legacy issues from early implementation stages, such as perceptions of valuation fairness, land allocation choices, and eligibility questions, rather than deficiencies in entitlement delivery. These concerns are being addressed through ongoing case-specific follow-up.

3.2 Livelihood Restoration

Key Findings

Livelihood restoration constitutes the most extensive component of resettlement implementation due to the scale of economic displacement. The Project delivered livelihood support through agricultural inputs, transitional support, livestock rearing support, financial literacy training, vocational training, and small business restoration programming.

Findings indicate that livelihood restoration has been substantially effective. The development and application of the Know Your PAP (KYP) tool significantly strengthened the Project's livelihood assessment capacity by enabling household-level analysis of livelihood performance and verification of support delivery. Overall, 98% of Project Affected Households (PAHs) are maintaining or improving their livelihoods relative to pre-Project conditions.

¹ Project Correspondence, December 21, 2025.

² The RAP Closure Plan is to confirm that all compensation payments have been made and acknowledged by PAPs (see Section 5).

Key Recommendation

1. Monitor PAHs in Q1 2026 to ensure completion of entitlements of delivery and use of LRP training.

3.3 Vulnerable Support Program

Key Findings

The RAPs committed the Project to identifying vulnerable PAPs and providing targeted assistance. Over the course of implementation, vulnerability identification evolved from survey-based screening and identification of 306 vulnerable households to a more refined approach integrating field verification and KYP data. This process confirmed that vulnerability within the Project area is limited relative to the overall PAP population; as of the date of this report, 20 PAHs have been identified as potentially vulnerable, with an additional 7 PAHs remaining to be assessed and 20 PAHs that were not available or present at the time of the assessment (as described in Section 4.3.3.2, in initial screening based on broad categorization through socioeconomic surveys identified 1,985 potentially vulnerable PAHs, which was subsequently refined to 306 vulnerable PAHs).

Most identified vulnerable households have received support consistent with RAP commitments. A small number of cases require assessment, including both pre-Project and Project-induced vulnerability, and require targeted follow-up to ensure closure readiness.

While the Vulnerable Support Program process currently complies with RAP commitments, follow through on the recommendations must be completed prior to RAP closure.

Key Recommendations

1. Deliver vulnerable assistance measures, including, but not limited to livelihood training and inputs, transitional support, and measures tailored to specific household needs.
2. Liaise with local government to support vulnerable PAHs' access to existing government services.
3. CLOs to conduct vulnerable assessments of 4 PAHs identified in Consultant Team Mission 4 as potentially experiencing Project-induced vulnerability and, if Project-induced vulnerability is found, deliver final mitigations / support.

3.4 Concerns and Grievance Redress Mechanism and Management

Key Findings

The Project has established a formal concern and grievance redress mechanism consistent with RAP commitments. PAPs demonstrate awareness of concern and grievance channels, and CLOs and District Resettlement Committees (DIRCOs) and Sub-county-based Resettlement Planning Committees (RPCs) played a central role in issue resolution.

Since the Consultant Team's initial field mission, the Project has made significant progress in resolving outstanding concerns, particularly compensation-, land-, and replacement house-related concerns. In addition, the Project's updated Grievances and Concerns Tracker reflects significant progress in implementing the Consultant Team's previous recommendations. Specifically, within the data management system that tracks grievances and concerns and within the record keeping of the same:

1. Data management system: Standardized core fields have been introduced across all entries, reducing inconsistencies and improving the clarity of issue descriptions.
2. Data management system: Issue categorization has been strengthened, with structured fields for subject category, department, and initiative, facilitating clearer routing and accountability.
3. Data management system: Traceability has improved, with receipt and closure dates allowing more transparent tracking of turnaround times.
4. Data management system: Linkages to engagement activities are clearer, enabling CLOs and TEPU teams to connect specific concerns with ongoing outreach and follow-up.

As of March 2025, the grievance register reflects an overall closure rate of 99.9%, as shown in the following table³:

RAPs 2-5 Grievance Closure Progress Summary (March 28, 2025)

Grievances (RAPs 2-5)	RAPs 2-5 Planning	RAPs 2-5 Implementation	TOTAL
Registered	621	90	711
Closed	621 (100%)	89 (98.9%)	710 (99.9%)
Unresolved-Escalated to [Attorney General]	05	05	10
Resolved but not closed	00	00	00
Unresolved (Completed investigation)	00	00	00
Open	00	01	00

Key Recommendations

1. In addition to what is currently done for grievances, present an up-to-date Concerns Tracker as a standing agenda item at all DIRCO and RPC meetings to show outstanding concerns.
2. Develop a set of FAQs and Key Messaging Bulletins to provide clear, consistent answers to recurring questions and concerns raised by PAPs, District officials, RPC and DIRCO members,

³ Reproduced from "Grievances (All RAPs) Progress Summary" table in "Quarterly Engagement Bulisa District Resettlement Planning Committee (DIRCO): Tilenga Project RAPs 2-5 Implementation, 28th March 2025, hereafter, 'March 28, 2025 DIRCO Presentation', page 12. Note that in the original, the percentage of closed Implementation grievances incorrectly appears as 96.6%.

and other stakeholders. These should be widely used by CLOs and district counterparts in daily interactions with PAPs to reduce repetition of concerns and questions and ensure transparency.

3. Record the status of all remaining concerns in the Project Concerns and Response Table to facilitate communication with PAPs and support the Grievance Committee to act upon any active concerns that require escalation to grievances.

3.5 Engagement and Disclosure

Key Findings

The Project's engagement and disclosure efforts are active, ongoing, and broadly consistent with RAP commitments, with evidence confirming that PAPs were informed prior to and during key stages of RAP planning and implementation, including disclosure of cut-off dates, compensation eligibility, entitlement options, and replacement house designs. Engagement was carried out through village meetings, RPC and DIRCO meetings, CLO-led household visits, and direct communications with PAPs.

Key Recommendations

1. See recommendation # 2 under 3.4 above (Concerns and Grievance Redress Mechanism and Management).
2. Prepare a focused engagement plan on RAP and Phase II Livelihoods Programming closure.

3.6 Gender Considerations and Mainstreaming

Key Findings

The Project established a set of gender-related commitments through the RAPs and the Gender Management Plan (GMP), including gender-sensitive valuation, spousal consent, joint titling, and equitable access to compensation and livelihood support. Field observations confirmed that these commitments were embedded in resettlement execution activities. At the procedural level, mechanisms exist to help safeguard women's rights in compensation and land tenure, including the requirement for spousal consent and the use of joint land titling and Joint bank account opening. These frameworks reflect good practice in gender-sensitive resettlement planning. As such, the Project's efforts are consistent with RAP and GMP commitments.

Key Recommendation

1. Align gender programming with RAP closure process, including ensuring that RAP closure data is recorded separately by gender in Project databases and reports.

3.7 Monitoring and Database

Key Findings

The Project has established core monitoring and data management systems aligned with RAP commitments. Compensation agreements, survey forms, livelihood restoration-related information, and other data are accessible through the Project's database system.

The development and deployment of the KYP tool represent significant advancements in monitoring and evaluation. KYP functions as a household-level monitoring mechanism, enabling verification of support delivery, identification of data gaps, and assessment of livelihood outcomes over time. While RAP reporting remains siloed by department function, the Project has the capacity to stitch data together to meet RAP closure requirements.

Key Recommendation

1. Complete Q1/Q2 2026 Monitoring of Livelihood activities:
 - a. Confirm stabilization of livelihood activities through RAPs 2-5 programming.
 - b. Assess range of livelihood strategies against RAPs 2-5 baseline.
 - c. Identify range of entrepreneurial activity and assess support alignment within Agricultural Development Program (ADP) and Community Integrated Development Initiative (CIDI) programming.
 - d. Update KYP Profile for Closure Interview.

Taken together, the findings indicate that the Project has implemented the resettlement program in a manner consistent with the intent and substance of RAP principles, with remaining recommended actions largely focused on consolidation, documentation, and targeted follow-up rather than corrective redesign of core resettlement program elements.

4.0 RAP Closure

Based on the PAP interviews, review of Project documentation and datasets and interviews with Project staff and other stakeholders, the Consultant Team recommends that the Tilenga Social Department initiate a RAP closure process. A RAP Closure Plan is identified in Section 5.

TABLE OF CONTENTS

ABBREVIATIONS AND ACRONYMS	2
EXECUTIVE SUMMARY	4
LIST OF TABLES	12
LIST OF FIGURES	13
1 INTRODUCTION	14
1.1 Purpose of this Report.....	14
1.2 Resettlement Policy Overview.....	14
1.3 Overview of the Assessment.....	17
1.4 Components of the Review	18
1.5 Structure of the Report	19
1.6 Limitations	19
2 ASSESSMENT CONTEXT	20
2.1 Background on the Project.....	20
2.2 Principles of the RAP 2-5	21
2.3 Overview of Impacts.....	21
2.4 Resettlement Chronology.....	22
2.5 Current Status of Resettlement.....	24
3 SUMMARY OF RESETTLEMENT PROGRAM FINDINGS.....	27
3.1 Entitlements & Redress Mechanism	27
3.2 Compensation and Relocation	27
3.3 Livelihood Programming.....	28
3.4 Vulnerable Support Programming.....	28
3.5 Engagement and Consultation	28
4 RESETTLEMENT PROGRAM FINDINGS.....	29
4.1 Compensation and Entitlements	29
4.2 Livelihood Restoration.....	41
4.3 Vulnerable Support Program.....	48
4.4 Concern and Grievance Redress Mechanism and Management	52
4.5 Engagement and Disclosure	56
4.6 Gender Considerations and Mainstreaming.....	61
4.7 Monitoring and Database	66
5 RAP CLOSURE.....	70
6 SUMMARY OF RECOMMENDATIONS	73
APPENDICES.....	77
Appendix A - Project Commitments Compared to IFC Performance Standards.....	77
Appendix B - Impacts Overview Tables.....	80
Appendix C - Chronology of Mitigations	83
Appendix D - Project Documentation	84
Appendix E - Summary of Livelihood Mitigation Entitlements	88
Appendix F - Four-Level Pyramid Used to Rank Livelihood Restoration Needs.....	94

Appendix G - Summary of Livelihood Restoration and Vulnerable Support Program Impacts and Mitigations95
Appendix H - PAHs Livelihood Profiles97

LIST OF TABLES

Table 1: RAP Entitlement & Eligibility Framework (Replacement of Primary Dwellings)	31
Table 2: Cut-off Dates	33
Table 3: Number of Primary Residents Comparison (2019 vs. 2025)	38
Table 4: RAPs 2-5 Grievance Closure Progress Summary (March 28, 2025)	54
Table 5: Concerns by Category (August 2025).....	54
Table 6: Summary of Recommendations.....	73

LIST OF FIGURES

Figure 1: Overlaps in the Tilenga Project RAPs 1, 2, 3a, 3b, 4 & 516
Figure 2: Compensation Process.....32
Figure 3: Assets Survey and Valuation Process.....37
Figure 4: Recommended Concerns and Grievance Closure Process53

1 INTRODUCTION

Land and People Planning Ltd. and Interface Consulting Ltd. have formed a joint venture (the “Consultant Team”) to provide Social Performance Advisory Services to TotalEnergies EP Uganda (TEPU) in support of land acquisition, resettlement, and livelihood restoration for the Tilenga Project (“the Project”).

1.1 Purpose of this Report

The purpose of this Report is: first, to provide a comprehensive third-party assessment of the Tilenga Project’s resettlement efforts for Resettlement Action Plans (RAPs) 2-5, and second, to provide actionable guidance to support eventual closure of the resettlement process.

The report is designed to achieve the following specific goals:

1. Evaluate the adequacy and effectiveness of the RAPs’ implementation, which include identification and targeted support for vulnerable people, management of RAP-related grievances, engagement with stakeholders and public disclosure, actions taken for livelihood restoration, and compensation for physical and / or economic displacement. The performance standards for these measures are set out in the RAPs, which reference the International Finance Corporation (IFC) Environmental and Social Performance Standard 5 on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.
2. Provide clear recommendations to guide the Project from the completion of mitigation measures under RAPs 2-5 through to their orderly closure, ensuring that all entitlements are delivered, livelihood restoration efforts reflect Project commitments, and Project Affected Persons (PAPs), Households (PAHs), and Communities (PACs) are positioned to participate sustainably in the regional economy shaped by Project development.

1.2 Resettlement Policy Overview

The ‘Tilenga Project’ refers to the development of six oil fields within Contract Area CA- 1, License Area LA-2 (North) in the Albertine Graben, Western Uganda by TEPU). The Project forms part of the wider oil and gas development being undertaken in the Lake Albert region. The overall objective of the Project is to establish production of the oil fields located within CA-1 and LA-2 North in an economically robust manner using sound reservoir management principles and best industry practice.

In 2016, the Joint Venture (JV) Partners in conjunction with the Government of Uganda disclosed a Land Acquisition and Resettlement Framework (LARF) aimed at standardizing the way in which land acquisition and resettlement planning is conducted across all the Licence Areas, and to ensure a consistent approach in line with the IFC’s Performance Standards (PS) (particularly PS5 on Involuntary Resettlement and Land Acquisition). The LARF included benchmarking of resettlement practices in Uganda against IFC Performance Standards. Appendix A, with content reproduced from the LARF and RAPs, lists the Project’s commitments to meeting these standards.

The purpose of the LARF is to⁴:

- *Clearly and comprehensively define a framework of terminology, objectives, policies, principles and organizational arrangements that will govern resettlement activities related to the Project;*
- *Assist with the application of and compliance with Ugandan legal requirements and IFC standards; and*
- *Provide practical guidance to Project personnel (including JV Partners, contractors and consultants) in the planning and implementation of the overall Project.*

The LARF aims to specifically address the social impacts due to the process of land acquisition and involuntary resettlement. It provides the overarching policy framework for the development of upstream oil and gas facilities in the Albertine Graben. It will subsequently and guide the development of more detailed resettlement action plans (RAP) for each project component requiring resettlement and compensation. The LARF and each of the project specific RAP will serve to inform the environmental and social impact assessments (ESIA). Environmental impacts of the project land intake will therefore be addressed in the wider scope of the ESIA.

RAPs that are subject to this independent assessment were prepared for the following Project components (a map showing the RAP areas is provided in Figure 1⁵):

- RAP 2: North Western Components
- RAP 3a: North Eastern Components
- RAP 3b: South Eastern Components
- RAP 4: Feeder Pipeline Components
- RAP 5: Upgrade of Existing Access Roads

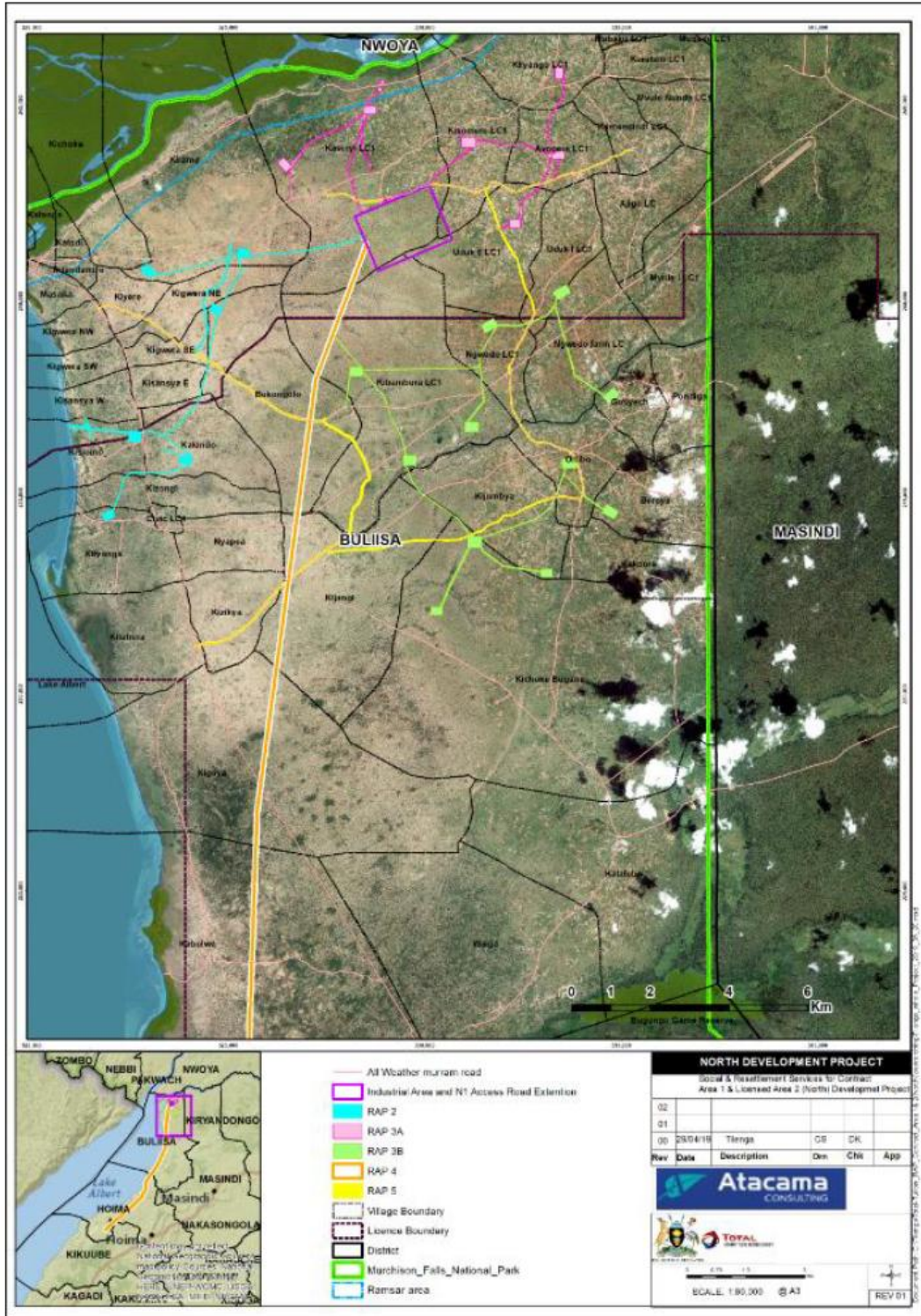
The RAPs state that each “was established according to the following standards and principles”⁶:

- *Land Acquisition and Resettlement Framework (LARF), for upstream oil and gas development in Uganda, which was endorsed in December 2016 by the Ministry of Lands, Housing and Urban Development (MLHUD), the Ministry of Energy and Mineral Development (MEMD) as well as, by the three JV partners.*
- *IFC Performance Standards January 1, 2012 and in particular:*
 - *PS 1 - Assessment and management of environmental and social risks and impacts;*
 - *PS 5 – Land Acquisition and Involuntary Resettlement; and*
 - *PS 8 – Cultural Heritage.*

⁴ Land Acquisition and Resettlement Framework Petroleum Development and Production in the Albertine Graben (December 2016), hereafter cited as “LARF”, pages 7-8.

⁵ Resettlement Action Plan 2 For the proposed North Western Components (February 2021), hereafter cited as “RAP 2”, page 1.

⁶ RAP 2, Figure 4.1, page 38.



1.3 Overview of the Assessment

Between 2024 and 2025, the Consultant Team completed four field missions under the Social Performance Advisory Services for the Tilenga Project RAPs. The missions focused on three key factors needed to take stock of progress towards successful implementation and the attainment of an equitable and sustainable outcome for PAPs, which is the overall goal and ultimate purpose of PS5.

These factors are:

- The **adequacy of entitlements and redressal measures** used to address impacts on affected people and parties.
- Outputs from the Concerns and Grievance Mechanism (CGM), which includes participation of local community leaders, to identify salient concerns and facilitate their resolution.
- Review the Project **sponsor's organizational arrangements and reporting** (including roles and responsibilities) needed to ensure effective communication and input from PAPs in the delivery and success of entitlement remedies.

In carrying out its field activities, the Consultant Team:

- Conducted an on-the-ground field review of resettlement activities.
- Met with Project-based staff in Kampala and in the field to understand the current status of resettlement activities.
- Conducted key informant interviews and focus group discussions with PAPs, Project Affected Households (PAH) and representatives of Project Affected Communities (PAC).
- Captured the broad perspectives on the resettlement process through meetings and discussion with community-based organizations, community representatives and community officials.
- Identified critical concerns and recommended associated corrective actions that can be prioritized and implemented.
- Identified a plan for future missions designed to ensure capture of relevant information in a timely and effective manner.

Working towards a set of initial outcomes and based on the assessment and subsequent discussions with the Project Team, the Consultant Team:

- Determined an approach to monitoring and reporting that allows for effective communication about ongoing efforts towards displacement risk and impact mitigation and is aligned with the objectives of IFC Performance Standards.
- Defined horizons for vulnerable and livelihood programming based on risk and impact defined within the RAPs, Global Livelihood Restoration Plan (LRP) and data supplied through implementing partners that align with Project commitments contained in the LARF, RAPs and associated management plans.
- Identified a roadmap for integration of resettlement activities with broader management plans and development goals based on the completion of livelihood programming in Q1 2025.

- Advised and contextualized displacement risks facing the Project from current grievances and concerns, including holdouts.

1.4 Components of the Review

The Consultant Team undertook an extensive program of site visits, household-level interviews, data verification exercises, and engagements with Project stakeholders to assess the implementation of RAP commitments and evaluate progress toward livelihood restoration and RAP closure. The fieldwork included direct interactions with PAPs, PAHs, Community Liaison Officers (CLOs), resettlement committees, implementing partners, community-based organizations, district officials, and TEPU Social Performance and Lands teams.

Household-level assessments were conducted to verify compensation delivery, tenure of replacement housing and land, household vulnerability, livelihood support outcomes, and evolving household circumstances. These engagements enabled the Team to confirm household eligibility, review entitlement records, document livelihood transitions, and assess the effectiveness of livelihood restoration support. The Consultant Team also confirmed links between Project records and household-reported information, helping identify data inconsistencies, missing entries, or where household realities had changed since compensation.

Engagements with PAPs were conducted at household compounds, community meeting spaces, and gardens. These visits allowed the Team to observe housing conditions, land use, economic activities, access to water, social services, agricultural plots, and assets acquired through livelihood programs. Know Your PAP (KYP) data verification included validation of household composition, income-generating activities, sources and use of livelihood inputs, and classification of households under the intensive or general support categories. During these visits, field teams also documented and assessed PAPs' perceptions of compensation fairness, timing, clarity of information received, and the adequacy of support provided.

Engagement was conducted with representatives from Buliisa-based NGOs and representatives from district officials regarding resettlement, including its current status, community dynamics, livelihoods and local economic development and effectiveness of programs.

In parallel, the Consultant Team facilitated structured technical sessions with CLOs, implementing partners, and TEPU staff to confirm how livelihood support, vulnerability management, grievance handling, and monitoring systems had been implemented. These sessions contributed to improving data recording practices, refining the KYP tool, and standardizing issue-tracking formats. The Team also engaged district authorities and relevant agencies to understand local socioeconomic dynamics and livelihood opportunities emerging around the Project.

The Consultant Team participated in joint field activities with TEPU and implementing partners. It also engaged in mission reporting to TEPU, implementing partners and Petroleum Authority of Uganda (PAU), which helped confirm the current status of livelihood activities and the management of emerging concerns. These engagements also allowed for real-time clarification of expectations around RAP closure, transition planning, and the categorization of unresolved concerns.

1.5 Structure of the Report

The Report is divided into the following five sections:

Section One, Introduction: introduces this Report, its purpose and scope and overview of its contents.

Section Two, Assessment Context: provides an overview of the background to the assessment work, including an overview of the Project, RAP principles, overview of displacement impacts, resettlement chronology and an overview of the current status of resettlement implementation.

Section Three, Summary of Findings: provides a summary of findings of the delivery of the entitlement and redress mechanisms, compensation payments and relocation of displaced PAPs, livelihood programming implementation and consultation and engagement efforts.

Section Four, Resettlement Program Findings: provides recommendations for current RAPs 2-5 programming, including Vulnerable, Grievance Redress Mechanism, Engagement and Disclosure, Livelihoods, Gender and Monitoring and Database.

Section Five, RAP Closure: provides an overview and recommendations for resettlement closure.

Section Six, Summary of Recommendations: provides a list of recommendations appearing in this report in tabular format.

1.6 Limitations

The key findings contained in this document were based on information provided by TEPU, its subcontractors and other available sources, including but not limited to PAPs, government organizations, business associations, financial institutions, agricultural organizations, and District Resettlement Committees (DIRCOs) and Resettlement Planning Committee (RPC) members. LP is not responsible for the validity of the provided information or for any changes in risk or uncertainty in the resettlement process due to actual results that may differ from reported results.

Quantitative information, data and the valuation process for government-led valuation was not independently reviewed by the Consultant Team and the Consultant Team is not verifying, validating or otherwise reviewing ensuing compensation rates resulting from the valuation process.

2 ASSESSMENT CONTEXT

2.1 Background on the Project

The 'Tilenga Project' refers to the development of six oil fields within Contract Area CA- 1 and License Area LA-2 (North). in the Albertine Graben, Western Uganda by TEPU. The Project forms part of the wider oil and gas development being undertaken in the Lake Albert region and the EACOP. The overall objective of the Project is to establish production of the oil fields located within CA-1 and LA-2 North and in an economically robust manner using sound reservoir management principles and best industry practice.

The six (06) oil fields - Jobi-Rii, Ngiri, Gunya, Kasemene-Wahirindi, Nsoga and Kigogole, will be developed together via a single Central Processing Facility (CPF) with a production capacity of 200,000 barrels per day of oil together with associated gas, produced water, injection water and associated utilities and camps. A total of about 420 wells will be drilled from 29 well pad locations, and a network of buried pipelines will collect the oil production from each well pad and transport it to a Central Processing Facility (CPF) located within the Industrial Area planned in Ngwedo sub-county, Buliisa District. From the CPF the treated oil will be sent to the oil export system via Tilenga Feeder Pipeline. The Project infrastructure will also include a water abstraction system on the shores of Lake Albert, the construction of new roads and upgrades to existing roads. One main party, Atacama Consulting, a Ugandan Company, and subcontracting Muhumuza-Kiiza advocates for Legal due diligence, Spot Surveyors and Engineering Consultants for Cadastral and asset surveys and Yamasec LTD for aerial survey imagery, are responsible for the RAP 2, 3A, 3B, 4 & 5 planning and implementation. Atacama Consulting was supported in the process by Monkey Forest Consulting Ltd, an international firm to provide expertise on IFC standards compliance.

The resettlement planning process was broken down into several phases, each of which contains various project components in Buliisa, Hoima, and Kikuube districts:

- RAP 1: Priority Areas (Industrial Area and N1 Access Road)
- RAP 2: North Western Components
- RAP 3a: North Eastern Components
- RAP 3b: South Eastern Components
- RAP 4: Feeder Pipeline Components
- RAP 5: Upgrade of Existing Access Roads

RAPs 2-5 are the subject of the current report.

2.2 Principles of the RAP 2-5

The principles identified in RAPs 2-5 are outlined in the LARF and includes the following⁷:

- Resettlement will be avoided and minimized
- Resettlement will be integrated into overall project planning
- Compliance with national laws and regulations, international standards, and Company policies
- Active and informed stakeholder participation
- Resettlement will employ culturally appropriate practices
- A publicly disclosed cut-off date (CoD) will be used
- Compensation will be based on full replacement value
- Comprehensive resettlement assistance package will be provided
- Informal rights will be recognized
- Vulnerable people will be provided with targeted assistance
- A grievance redress mechanism will be established
- Appropriate Monitoring and Evaluation will be undertaken

2.3 Overview of Impacts

Overall, the Project has acquired 2,108 acres of primarily agricultural (crop and grazing) land across RAPs 2-5, resulting in both physical (PD) and economic displacement (ED) affecting households through loss of agricultural land, structures, and access to livelihood resources. While a relatively limited number of PAPs (205 of 4,954, or 4%) experienced physical displacement requiring relocation and replacement housing, a substantially larger number of PAPs (4,749, or 96%) were economically displaced (ED) as a result of land acquisition and associated impacts to land use. The relatively low number of physically displaced PAPs compared to economically displaced PAPs supports the Project efforts to avoid negative social impacts, including resettlement, as described in the Tilenga Project ESIA.

Resettlement was implemented across multiple geographic areas and Project components through five RAPs. The predominance of economic displacement underscores the importance of effective livelihood restoration, transitional support, and ongoing monitoring to ensure that affected households are able to sustain or improve their living standards over time. The distribution and scale of impacts also highlight the need for structured entitlement delivery, grievance management, and data systems capable of supporting implementation oversight and closure readiness. Appendix B provides an overview of displacement in 2021 (at the time of RAPs 2-5 publication) and in September 2024 as well as a high-level portrait of displacement impacts in terms of land, public infrastructure, and sacred sites.

⁷ RAP 2, February 2021, pages 14-15.

2.4 Resettlement Chronology

Resettlement activities have been ongoing since 2016, with the exception of the period 2020-2021 when the Project was on hold. The resettlement process was undertaken in two phases: a planning phase and an implementation phase. The planning phase included development of the LARF (December 2016), development and disclosure of RAPs 2-5 and GLRP, socioeconomic and asset surveys, development moratorium, and establishment of a CoD. These activities were undertaken to establish eligibility, define compensation and assistance packages, and prepare affected households for implementation. Planning activities also included disclosure of resettlement options and replacement house designs.

The implementation phase comprised stakeholder engagement, disclosure of entitlements, the signing of compensation agreements, payment of compensation, issuance of acknowledgement of receipt, the notice to vacate (NTV), handover of replacement houses and land, delivery of transitional and vulnerable⁸ support, and rollout of livelihood restoration programming. Implementation occurred in stages across RAP areas and entitlement categories, reflecting the scale and complexity of impacts.

The activities listed above are described in detail below (the Chronology of Mitigations is shown in Appendix C):

- **RAP Planning Stage**

- **Land Acquisition and Resettlement Framework (LARF) (December 2016):** The LARF was prepared by the Joint Venture Partners to guide development of detailed action plans (RAPs) for each project component. It establishes the goals and principles (listed in Section 2.2) governing the resettlement process, the legal and regulatory framework within which resettlement will take place, and a strategy for resettlement and compensation. The LARF also provides a brief socio-economic profile of the Project footprint. The LARF was approved by the Government of Uganda.
- **Resettlement Action Plan (RAP) Development (2017-2020):** Following approval of the LARF, RAP planning commenced in 2017 with the development of Guidelines for Compensation Assessment under Land Acquisition.⁹
- **Surveys, Moratorium and Cut-off Dates:** RAP policy includes a CoD that is the same as the date of the asset survey. This date was disclosed to PAPs. Asset surveys were conducted between July 2018 and March 2019. Each PAP was notified of the CoD during the survey process and PAPs signed a form acknowledging the CoD. A socio-economic and census survey was conducted after the asset survey. Additional work was completed by the Project with respect to speculation control. This was carried out using drone captured aerial imagery within a Rapid Aerial Survey (RAS). The RAS were undertaken in July and December 2018 (see Section 4.1.4.1).

⁸ IFC defines vulnerable people as, “those who by virtue of gender, ethnicity, age, physical or mental disability, economic or social status may be more adversely affected by displacement than others, and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits(RAP 2, February 2021, page 197).

⁹ RAP 2, February 2021, page 24.

- **Project On Hold** – As part of an overarching Project slow down, some RAP processes were on hold from October 2019 to August 2020. During this period, Atacama continued working on the drafting of RAPs 2-5 and conducting reviews with the GOU authorities. The implementation phase started subsequent to RAP 2-5 disclosure in March 2021.
 - **Resettlement Action Plans (RAPs 2-5):** Final publication and disclosure of the RAP 2-5 documents occurred in March 2021. The RAP documents included key resettlement components including legal and regulatory overview, impact overview, compensation policy contained in the entitlement and eligibility framework, replacement house designs, livelihoods, vulnerable peoples, organizational, schedule and budget considerations and monitoring and evaluation requirements.
- **RAP Implementation Stage**
 - **Compensation Agreements:** Compensation agreements were prepared for individual PAPs as part of RAP implementation beginning in June 2021 with (93.3%) the majority of agreements completed by the onset of livelihood programs in March 2022 (as of the date of this report, 99.5% of PAPs have signed agreements and been paid. 0.5% of PAPs have not yet signed agreements for reasons listed in Section 2.5).
 - **Notice to Vacate (NTV):** Once compensation agreements were signed off by PAPs, payments were issued to bank accounts (set up with Project assistance), and PAPs were then issued a NTV. Issuances of NTVs for RAPs 2-5 commenced in August 2021 upon payment of the first three compensation batches to 155 PAPs, which followed their disclosure and signing of compensation agreements in June 2021.
 - **Livelihood Restoration Program (LRP):** With the initial livelihoods policy set out in the RAP documents, the Project prepared a Global LRP, completed in November 2020. The Livelihood Program design and subsequent setting out of contracts for implementing partners (e.g., subcontractors that delivered livelihoods programming including Eco & Partner Consult, Sunmaker Energy and Living Earth Uganda) was informed by a Livelihood, Monitoring and Evaluation (LiME) Survey, which identified PAPs' household livelihood strategies, preferences and significance of impacts and which was conducted in Q4 of 2021.
 - **Vulnerable Support Program:** With the disclosure of the RAP documents in March 2021, an initial vulnerable list consisting of 1,958 PAHs were identified based on analysis of the census and socio-economic survey (SES) contained in the RAP documents. In the RAPs, vulnerability is identified in terms of the groups most impacted by the displacement process (e.g., elderly, disabled, female-headed households, large dependent families). Vulnerable PAHs were provided tailored support measures including food baskets, relocation assistance, and prioritization and assistance in livelihood programming. Subsequent refinement of the initial RAPs 2-5 vulnerable list was conducted through the LiME Survey (see LRP above) and impact significance analysis resulting in a revised identification of 306 PAHs as vulnerable. Additional refinement was conducted of the vulnerable list in 2025 resulting in 20 PAHs.

- **Concerns and Grievance Mechanism:** A grievance management process is identified in the RAP and broadly includes the channels for lodging and resolution of project-based grievances. Implementation of grievance management was initiated with the disclosure of RAPs.
- **Stakeholder Engagement:** Stakeholder Engagement for RAP planning, disclosure and implementation was conducted with PAPs, Sub-County-level RPCs, comprised of PAP representatives, and DIRCOs comprised of government and non-governmental organization (NGO) representatives and internal stakeholders. Subcounty-level RPCs covering RAPs 2-5 were established between 2018 and 2019. The RPCs met monthly until September 2023, with the exception of the slow-down period between 2019 and 2021, when they did not meet. TEPU facilitated meetings with DIRCO and RPC again in March of 2025. PAPs were engaged individually during surveys, entitlement disclosure, signing of agreements and during mitigation programming.
- **Gender Management Plan (GMP):** The purpose of the GMP is to address the potential adverse gender-related risks and impacts associated with the development of the Project. The GMP lists potential gender-related impacts along with proposed mitigations, key performance indicators, and monitoring frequency and responsibility. GMP implementation began in 2022. The GMP is described in Section 4.6.1.1.

2.5 Current Status of Resettlement

The Consultant Team has been provided with Project documentation on an ongoing basis (see Appendix D). Based on this document review and presentations by TEPU and subcontractors, our understanding of the current status of resettlement for RAPs 2-5 as of December 2025¹⁰ includes:

- Of the 4,954 PAPs:
 - 205 (4%) were physically displaced¹¹ (PD) and 4,749 (96%) were economically displaced (ED).
 - Entitlement disclosure and signings have been completed for all PAPs.¹²
 - 4,102 households are affected by the Project (PAHs)
- 4,927 (99.5%) have signed compensation agreements. Of these 4,927 PAPs who signed compensation agreements, 100% have been paid.
- 27 PAPs have not been paid due to absence (7), land dispute in court (7), valuation disputes (11), and negotiation (2) with payment in escrow.

¹⁰ The figures in this section include information provided to the Consultant Team in Quarterly Engagement Buliisa District Resettlement Planning Committee (DIRCO): Tilenga Project RAPs 2-5 Implementation, 29th March 2025, hereinafter referred to as (DIRCO Presentation, 28 March 2025) and through Project correspondence in December 2025.

¹¹ While there are 205 Physically Displaced asset owners who are Primary Residents, 6 PAHs had more than one Primary Resident. Due to this, the Project refers to 199 PD Households.

¹² As of March 17, 2025.

- 29 of 30 (97%) PAPs have received replacement land.¹³
- 3,503 alternative lands or farms have been verified.¹⁴
- 205 (100%) replacement houses have been constructed.
- 7 (100%) replacement water boreholes completed.
- 4,741 (96%) PAPs¹⁵ received financial literacy training (FLT) as of September 2025.
 - 213 (4%) PAPs did not receive FLT due to absence, covid restrictions, or lack of interest.
- Livelihood restoration for PAHs with signed compensation agreements:
 - 4,187¹⁶ PAHs have completed at least 6 months of transitional support.¹⁷
 - 3,505 PAHs are registered to receive crop improvement services, of which 99% has been delivered.
 - 35 PAHs (1%) were not interested in receiving services.
 - 2,880 PAHs selected and are receiving livestock improvement services.
 - 117 (100%) PAHs received small business supports; 873 (100%) received alternative vocational training and 630 (100%) have been placed in an internship (for one month); and 30 (100%) completed the business incubation program and 28/30 (93%) received trading licenses.
- 20 vulnerable households (0.4%) have been identified with 7 PAH that require assessment.
- 711 grievances were registered starting from 2017, of which 710 have been closed (as of March 2025):
 - 621 grievances were registered at the RAP planning stage, of which 621 (100%) have been closed.
 - 90 grievances were registered at the implementation stage, of which 89 (98.9%) have been closed. The remaining open grievance was registered by a PAP who is currently unavailable.
- 10 have been escalated to the Government of Uganda (these are considered by the Project to be closed).

¹³ The remaining PAP is seeking to replace agricultural land with industrial land of a higher value. The matter has been referred to the Attorney General who must sanction the payment.

¹⁴ As of September 2024, Agricultural Support Services extension officers visited 3900 farms secured by PAP.

¹⁵ Both the asset owner and their spouse were to receive Financial Literacy Training

¹⁶ Due to the slow down period, the Project provided transitional support to households that were not impacted including those whose claim to asset ownership or access was not successful.

¹⁷ Transitional support is in process.

Note that PAP numbers vary from the initial data identified in the RAP to the current overview provided above based on data provided to the Consultant Team in September 2024, March 2025 and December 2025. The discrepancy is primarily due to the resolution of land disputes resulting in the split of assets.

A chronology of resettlement-rated mitigations is shown in Appendix C.

3 SUMMARY OF RESETTLEMENT PROGRAM FINDINGS

This section presents a consolidated assessment of the Project's implementation of resettlement commitments, with reference to the standards and requirements set out in the RAPs related frameworks. The analysis is organized thematically to reflect how the Project has performed against its core obligations, including entitlements and redress mechanisms, compensation and relocation, livelihood restoration, vulnerability support, engagement and consultation, gender mainstreaming, and monitoring and evaluation. The assessment draws on field verification, household-level data analysis, document review, meetings with implementing partners, and use of the KYP tool to evaluate progress and understand outstanding requirements for closure readiness. Detailed resettlement program findings are presented in Section 4.

3.1 Entitlements & Redress Mechanism

The Project's entitlement and redress systems are consistent with RAP commitments, particularly with respect to use of publicly disclosed CoDs, formalized eligibility criteria, compensation at full replacement value, provision of comprehensive entitlements, and establishment and maintenance of a structured Grievance Redress Mechanism. The Project's gender-related commitments to equitable access to entitlements have been met.

The Consultant Team observed that the grievance procedure has been operationalized as intended. The Project's current Grievances and Concerns tracker, which documents all closed and current grievances and concerns meets RAP closure requirements.

3.2 Compensation and Relocation

Compensation and relocation have largely been delivered in alignment with RAP principles, including adherence to compensation at full replacement value¹⁸, eligibility verification, and CoD enforcement. Mission findings confirm that physically displaced households received replacement houses built to agreed standards, and compensation agreements were signed and disclosed in accordance with RAP requirements.

The Project's gender commitments, including gender-sensitive valuation, spousal consent, joint titling of replacement land and opening of joint bank accounts, and equitable access to entitlements, are clearly outlined in the RAPs and Gender Management Plan and have been incorporated into project processes. These commitments are recognized and integrated procedurally around compensation and consent requirements.

¹⁸ Chief Government Valuer Guidelines for Compensation Assessment under Land Acquisition (GCALA), 2017, identifies full replacement value as current market cost.

3.3 Livelihood Programming

Livelihood restoration has progressed in consistence with RAP commitments to restore and, where possible, improve livelihoods through agricultural support, financial literacy, transitional assistance, and business development services. RAP obligations to support capacity building, facilitate resilient income restoration, and align programming to household needs have been operationalized through implementing partners. The introduction of the KYP process strengthened compliance by providing a quantifiable method to assess household-level livelihood outcomes, addressing gaps in program tracking and helping the Project demonstrate progress toward sustainable livelihood restoration. The Project's commitment to ensuring equitable for women to livelihood programming has been met.

As noted in Section 4.2.3.2, based on the analysis of several livelihood factors from baseline to endline, approximately 98% of PAHs overall are either maintaining or improving their livelihoods at pre-Project levels. These findings indicate that the Project's livelihoods restoration efforts have been successfully implemented.

3.4 Vulnerable Support Programming

The Project's approach to vulnerability reflects the intent of RAP commitments to identify vulnerable households, assess their needs, and provide prioritized support. As noted in Section 4.3.3, the Project's vulnerability assessment process, enhanced through application of the KYP tool and field verification, meets the RAP requirement for identifying vulnerable PAHs and distinguishing between pre-existing conditions and Project-induced vulnerability.

To fully meet its closure obligations, the Project will need to ensure that 7 remaining potentially vulnerable households (out of 306 PAHs) are assessed and that the 20 identified vulnerable households receive tailored, tracked, and targeted assistance aligned with their specific vulnerability context, and that outcomes are monitored to confirm restoration of living standards in accordance with RAP commitments and IFC PS5 requirements.

3.5 Engagement and Consultation

The Project's engagement and disclosure efforts were found to be active, ongoing, and consistent with RAP commitments to informed participation, clear disclosure, and access to entitlements information. The Project has demonstrated sustained efforts to communicate entitlements, compensation processes, CoDs, and livelihood programming through village meetings, RPC and DIRCO structures, and CLO-led interactions with PAPs, as defined in the Stakeholder Engagement Plan.

4 RESETTLEMENT PROGRAM FINDINGS

This section presents the Consultant Team’s assessment of the Project’s resettlement activities aligned with the commitments set out in the RAPs and supporting management plans. The assessment draws on findings from fieldwork undertaken across four missions, including consultations, household-level data verification, document reviews, and application of the KYP process. The results are consolidated across thematic areas to reflect the overall performance, strengths, and remaining areas requiring attention for RAP closure readiness. Each subsection sets out the observations related to program delivery, consistency with RAP commitments, and progress toward meeting the objectives of RAP closure.

4.1 Compensation and Entitlements

Compensation and entitlement delivery formed the foundation of the Project’s resettlement effort. It provided the mechanisms to identify eligible PAPs, measure impacts to land and property, and deliver compensation at full replacement value using both cash and in-kind options. The Consultant Team’s findings confirm that the core compensation commitments are being met. This section assesses delivery against RAP principles and Project commitments.

4.1.1 Compensation Principles

The Project committed to the following key principles with respect to compensation¹⁹:

Principle 6 - *A publicly disclosed cut-off date will be used*

Eligibility for resettlement assistance will be determined by a publicly disclosed census cut-off date. It will limit eligibility to genuinely affected people and preclude an influx of people into the Licence Area.

Principle 7 - *Compensation will be based on full replacement value*

PAPs will be eligible for compensation for loss of assets at full replacement value, as well as rehabilitation assistance. Land acquisition and resettlement should be conceived as an opportunity for improving the livelihoods and living standards of PAPs.

Principle 8 - *Comprehensive resettlement assistance package*

Physical relocation and re-establishment of households will be supported through a comprehensive assistance package tailored to the project socio-economic environment that:

- *Is culturally appropriate;*
- *Offers PAPs a choice of compensation packages of equal or higher value, equivalent or better characteristics, and advantages of location;*

¹⁹ RAP 2, Chapter 2, Resettlement Goals and Principles, page 15.

- *Is transparent, consistent, fair and equitable, with people who have equivalent assets being treated in the same way;*
- *Encourages the acceptance of replacement housing for affected households;*
- *Will include the design of replacement housing that meets all statutory requirements, considers local preferences and is culturally appropriate. Cash compensation may be appropriate in certain circumstances, but must be based on a documented assessment of the ability of the affected person to use the cash to restore and improve their housing standards, and;*
- *Involves resettled and host communities participating in the selection of resettlement sites. The site selection shall follow a systematic process that also considers proximity to affected areas, accessibility and locational advantage.*

4.1.2 Replacement Houses

LARF Principle 8 – Comprehensive resettlement assistance package identifies the Project’s commitment to compensation and assistance to physically displaced PAPs as follows:

Physical relocation and re-establishment of households will be supported through a comprehensive assistance package tailored to the Project socio-economic environment that will include the design of replacement housing that meets all statutory requirements, considers local preferences and is culturally appropriate.

Chapter 8.2 of the RAPs defines physically displaced PAPs as “Individuals, households or groups who will lose their place of residence due to Land Acquisition required for the RAP ... project area.”²⁰ The RAP continues:²¹

For this resettlement, PAPs are defined as any individual or group of persons (this constitutes a family or clan with shared interest in an asset) who, loses the right to own, use or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset either in full or in part, permanently or temporarily. A PAP may have a right to one or more groups of assets including (a) rights to land, (b) ownership of annual and/or perennial crops and trees, (c) homestead property, (d) homestead structures, (e) graves, (f) shrines, and (g) other privately held physical assets located within the development footprint of the RAP... project area.

Excerpts from the RAP Entitlement and Eligibility Framework with regard to replacement of primary dwellings are shown in Table 1.²²

²⁰ RAP 2, Table 8.1, page 139.

²¹ RAP 2, pages 139-140.

²² RAP 2, Table 8.2, page 142.

4.1.3 Compensation Standards

The Project committed to apply the international standards where they are more stringent than host country laws. A Market Research Study for compensation rates was undertaken in July 2018. Land Values, Structures and Agronomist Reports were submitted to the Chief Government Valuer (CGV) on 1 February 2019 for approval. According to the Project, Hoima and Buliisa adopted the rates contained within the Market Research Study for land, structures, and crops. Valuation reports for RAPs 2 and 4 were approved on 12 July 2019, followed by approvals of valuation reports for RAPs 3a, 3b, and 5 on 2 October 2019. There was a delay in commencement of compensation, which was exacerbated by the COVID-19 pandemic. As a result of these delays, the approved rates were outdated. To compensate for the delay, the Project adopted a 30% uplift to the approved rates.

Table 1: RAP Entitlement & Eligibility Framework (Replacement of Primary Dwellings)

Type of loss	Category of Affected Person	Entitlement	Eligibility
Dwelling used as primary residence	Owners who live in the affected house and structures	Option 1: In kind Replacement house of equivalent size (measured floor area or number of rooms) with consideration of functional spatial use at location of owner's choice but within a defined project area. Choice of standardized replacement house designs that comply with building/ planning standards and that take spatial and cultural function into consideration. House constructed from durable wall and floor materials and with permanent roof.	All affected people must prove ownership which is established through the final asset surveys. Options 1 and 2: owners will be allocated a new built house for the primary residence* if the affected structure is complete and present within the boundary of the Project site at the time of the CoD date and identified through final asset surveys. * indicated as primary residence in the asset survey

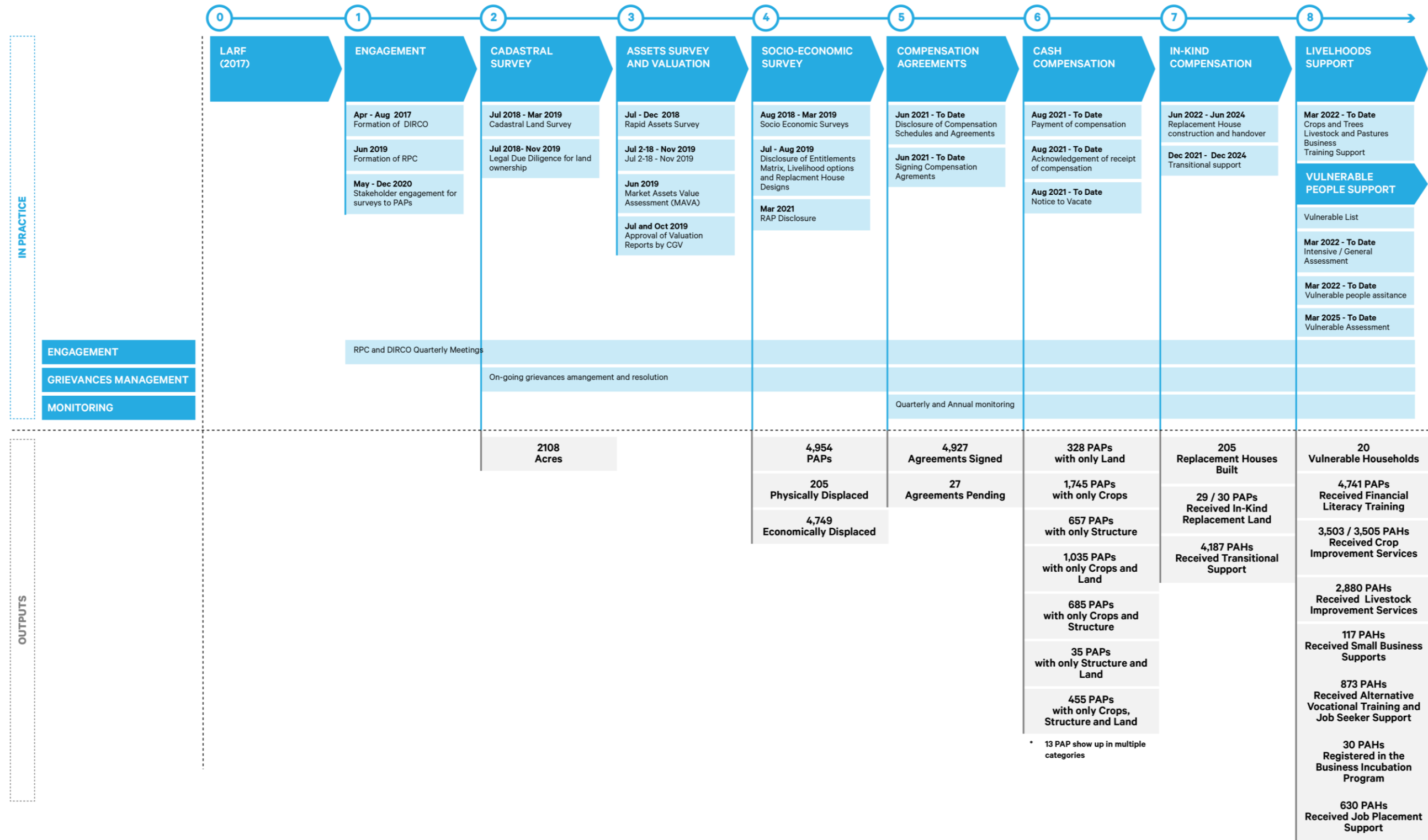


Figure 2: Compensation Process

4.1.4 Entitlement and Compensation Process

The entitlement and compensation process comprised cadastral and asset surveys, establishment of a CoD, SES, signing of compensation agreements, and finally, compensation (cash and in-kind). The process, including key dates, is shown in Figure 2.

4.1.4.1 Cut-off Date

In projects involving land acquisition and resettlement, individuals may engage in speculation and introduce new developments on their land in anticipation of Project compensation. A CoD is designed to prevent or minimize costs associated with such activities. The RAP references the need for establishing a CoD. The Project followed IFC PS 5 Guidance Note 5, Paragraph 32, which provides for setting a CoD once a PAP’s assets have been valued. The Project adopted a rolling CoD, meaning, that, for each PAP, the CoD was considered to be the date on which the asset survey was completed. Each PAP signed a CoD Form confirming the date of the asset survey. For this report, this is considered to be the “primary” CoD.

PAPs were informed that:

- Any additional developments on, or improvements to, the PAP’s land (e.g., new structures, crops, etc.) made after the CoD are not eligible for compensation by the Project.
- Any new persons occupying the land after the CoD date are not eligible for compensation for lost assets, resettlement, and / or rehabilitation.
- PAPs can continue to cultivate crops, bury the dead, graze animals, or construct structures before or after the assessment, however, any new developments or crops established after the CoD will not be eligible for compensation.

To curb the anticipated speculation, prior to starting the asset survey described above, which included cadastral surveys and physical inspections of structures, the Project undertook a RAS using aerial flights carried out by drones. Geo-referenced images in GeoTiff format, 0.035m / pixel resolution were produced as the final output. The presence or absence of a structure in the aerial images was used to confirm its eligibility for compensation as either a primary residence where PAP could choose between cash or in-kind compensation or a secondary residence where PAP would receive cash compensation (see Section 4.1.1.5.1). The RAS program established a “secondary” CoD (the date of the aerial imagery) that was earlier than the official CoD described above (see Table 2). It is important to note that the use of the RAS program as a speculation-control measure is recommended in the Government of Uganda Guidelines for Compensation Assessment under Land Acquisition (GCALA).

“Primary” and “secondary” CoDs are listed in Table 2.

Table 2: Cut-off Dates

RAP	“Primary” CoD	“Secondary” CoD (Ras Image Date)
2	26 th July 2018, – 6 th January 2019	15 th – 25 th July, 2018
3a	18 th – 19 th February 2019.	18 th – 21 st December 2018.
3b	18 th – 19 th February 2019.	18 th – 21 st December 2018.

4	31 st July – 9 th November 2018	15 th – 25 th July 2018
5	11 th – 26 th January 2019	18 th – 21 st December, 2018

As anticipated, many PAPs attempted to build new structures with the hope of qualifying for a replacement house. The Project adopted the following three eligibility criteria to qualify for physical displacement, each of which must be fulfilled to confirm eligibility:

- Criteria 1: Asset ownership and use were determined based on the SES.
- Criteria 2: “Primary” CoD - Cadastral survey and physical inspection of the structure, including interior photographs of the structure to determine the authenticity of the settlement.
- Criteria 3: “Secondary” CoD - Structures must appear in the RAS aerial imagery.

4.1.4.2 Disagreements With Respect to Compensation

4,954 PAPs were disclosed to. As of March 2025, in cases where there were disputes respecting compensation agreements, the following processes were followed, depending on the nature of the disputes:

- **Internal Disputes Within PAHs (54 PAPs²³):** In cases where PAH members were unable to decide amongst themselves how to manage purchase and distribution of replacement land using cash compensation, but where the PAH collectively did not take issue with the valuation, the PAH and Project entered into a Memorandum of Understanding (MOU) giving the Project access to the land and the Project placed the compensation payment into an ESCROW account, to be released when the household members resolved their internal dispute.
- **Where PAPs Disputed Compensation Rates (6 PAPs):** In cases where PAPs disputed compensation rates, PAPs signed a Consent Form acknowledging, that whilst they were disputing the rates, they granted the Project access to the land. Cash compensation was placed into an ESCROW account until the PAPs and Project could agree upon a rate, at which point the agreed compensation was paid to the PAPs.
- **Where no Agreement is Reached (29 PAPs):** Cases where PAPs and the Project could not reach an agreement were escalated to the Government of Uganda (GoU), who referred matters to the court for resolution. In these cases, courts granted the Project access to the land provided the Project deposit compensation amounts in ESCROW accounts pending resolution by the court.

As of December 2025²⁴, the Project indicated it had paid compensation to 4,927 PAP according to their compensation agreement. The Project also indicated that it has placed payment in ESCROW for 27 PAPs who have not yet signed their agreement.

In cases where there were no disputes, compensation was paid and land access granted.

²³ “Disclosure, Agreements Signing, Compensation Payment Progress Summary: - 17/03/2025” Table in March 28, 2025 DIRCO Presentation, page 8.

²⁴ Project Correspondence, December 21, 2025.

4.1.4.3 Replacement House Design Process

The RAPs confirm that the model house design was presented to the physically displaced PAPs and was accepted. The replacement houses were designed to the relevant building standards²⁵ based on the principal that “building materials and the skills necessary to construct with these materials are available locally.”²⁶

Chapter 9.3.1 of the RAPs (Replacement of Primary Residence), specifically confirms that:

The size of the replacement house will be equal to that of the existing house based on the asset inventory survey data and, that:

The number of rooms will also be the same as those found in the existing house(s) and the size of the rooms proposed will be in line with the requirements of the national building standards and regulations of Uganda.

All the living space in the impacted structures was consolidated and a replacement house of the same area provided. The replacement houses varied from 2 to 4 bedrooms depending on the number of rooms in the impacted residential structure. Replacement houses consisted of three sizes: 54 square meters, 66 square meters, and 78 square meters. Other amenities included in the replacement house consisted of a 9 square meter kitchen, a 7 square meter latrine and shower, a 5,000 litres rainwater harvest tank, and solar lighting. Some PAPs reported that as a result of the consolidations they have fewer rooms than they had before.

The Project followed industry best practice in the replacement house selection process. The process included the following:

- Adoption of an Area-for-Area replacement principle commensurate with compensation legislation to compensate all structures. This required consolidation of all eligible area and providing a standard house with area equal to or greater than the eligible area.
- Several standard house designs with different number of bedrooms and total area were developed. Eligible PAPs qualified for different house types as described above.
- The RAP 2-5 PAPs were shown the RAP 1 resettlement houses as model houses. These houses were approved by the District Planning Committee. The PAPs opted for the same type of houses.
- The PAPs were also given the option to choose between houses with different rooms or consolidated into one house. PAPs chose the consolidated houses.

The Project followed due process to guide the PAPs in selecting replacement plots. The criteria for qualification of the resettlement plots included construction accessibility, location, and minimum plot size. The minimum plot size was based on the layout of the replacement structures to be provided. Despite some claims by PAPs that plots are restrictive or not their first choice, in all the cases reviewed, PAPs selected the plot as per the guidelines.

²⁵ Resettlement Action Plan 3a for the proposed North Eastern Components (February 2021), hereafter cited as “RAP 3a”, page 156.

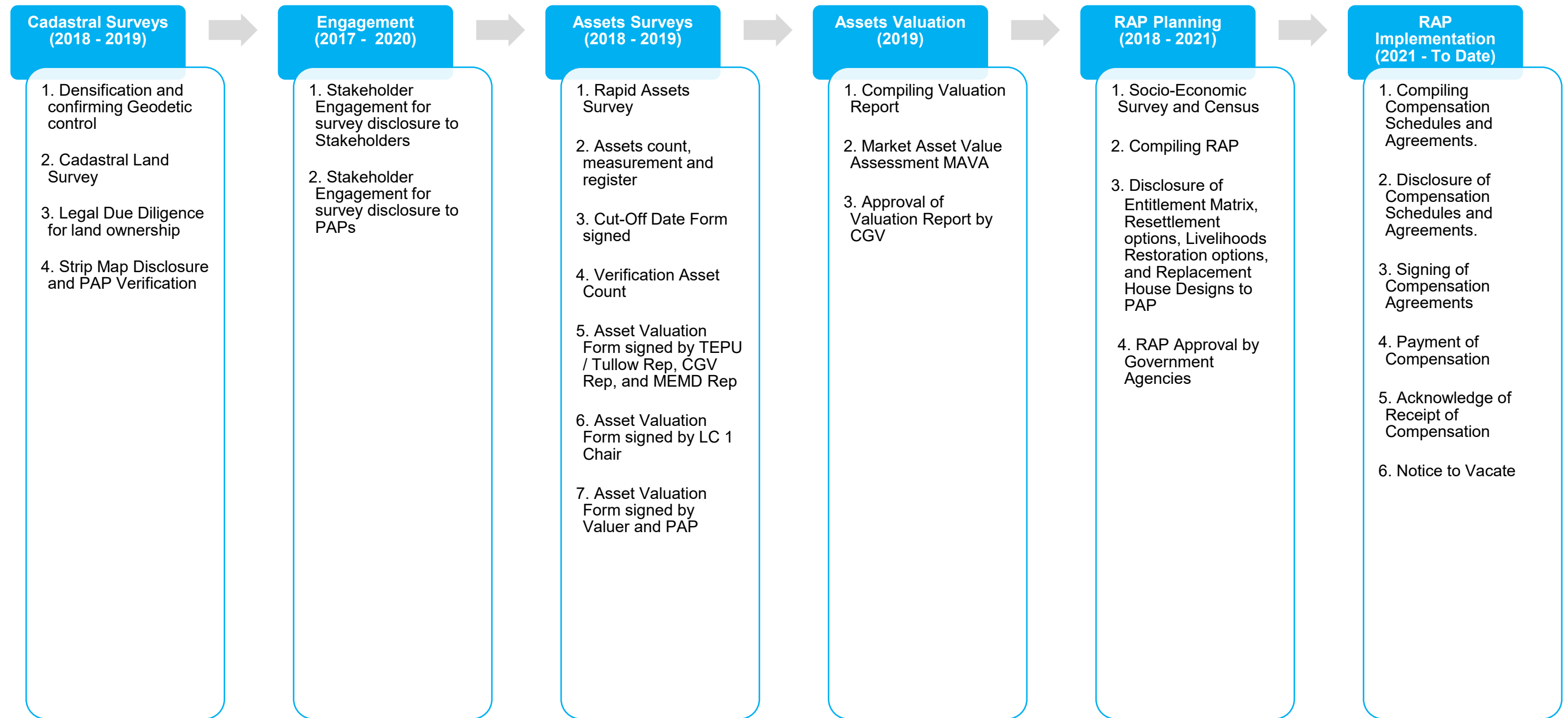
²⁶ RAP 3a, page 158.

Although the PAPs selected the resettlement houses as designed, some had no prior knowledge or experience living in houses with consolidated rooms, which resulted in PAPs expressing reservations about sharing rooms with children. However, finding the balance between the number of rooms lost, the number of household members, and the cultural homestead set up remains a challenge in all resettlement projects worldwide.

4.1.4.4 Assets Survey Process

The Consultant Team confirmed the chronology of the asset valuation process set out below from an ongoing grievance and through confirmation by Atacama.

An outline of the Project's Assets Survey and Valuation process is shown in Figure 3.



4.1.5 Key Findings

4.1.5.1 Key Findings

4.1.5.1.1 Classification of Primary and Secondary Residences

Despite efforts to curb speculation, it was not eliminated. A total of 1,323 new speculative structures were identified by the RAS. The speculative structures were presented by the PAPs as primary residences with the hope of qualifying for a replacement house. The Project disqualified them as primary residences, and instead reclassified and compensated them as secondary residences, even though they did not meet the definition of secondary residence²⁷. The valuation process outlined in the Valuation Report assigns compensation rates to structure based on two categories: 1) Construction materials used (permanent or temporary) and 2) Level of completion (complete or incomplete). The valuer estimates the level of completion and assigns a percentage value.

The RAPs' Entitlement and Eligibility Framework does not offer a precise definition of "primary residence." However, a secondary residence is defined as a rental house and/or house for relatives. All other residential structures are therefore assumed to be primary residences. To receive in-kind compensation, PAPs are required to prove ownership of the property. The structure must also be complete, present within the Project footprint at the time of the CoD, and confirmed in the assets register. Occupancy of impacted residential structures was confirmed as part of the valuation survey. Unoccupied structures identified as speculative were classified as secondary residences and compensated.

Speculation management is most effective when done openly and directly. The Project could have optimized use of aerial imagery in addressing and deterring speculation by showing PAPs an aerial image of their compound soon after it was taken, and before the start of the asset assessment, and explaining that any new buildings found on the compound after the date of the image (the "secondary CoD") would not be compensated.

The Project offered channels for PAPs to dispute the secondary classification. The Project reclassified 30 structures to primary residences over the initial classification indicated at the time of RAP disclosure in 2019 (see Table 3). A review of Project records indicates that at least 35 closed grievances related to classifying structures.

Table 3: Number of Primary Residents Comparison (2019 vs. 2025)²⁸

Year	RAP-2	RAP-3a	RAP-3b	RAP-4	RAP-5	Total RAPs 2-5
2019	61	16	32	45	51	205
2025	60	11	29	32	43	175

²⁷ All structures recorded as "House" in the asset survey that were not determined to be Primary Residences are therefore classed as dwellings for secondary purposes.(RAP 2, page 165). Dwellings used for secondary purposes (rental houses, free accommodation for relatives, etc.) (RAP 2, page 257).

²⁸ Submission of Additional Information and Clarification by TEPU 04/03/2025

Change	1	5	3	13	8	30
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4.1.5.1.2 Compensation Rates

Land rates were established through the Office of the Chief Government Valuer, which sets compensation rates for land for each District. According to the Project, the rates for Hoima and Buliisa districts were adopted from the 2018 Market Research Study. The rate included a standard 30% top up for disturbance²⁹ and the Project added a 30% uplift for delays in compensation to cover the period between the CoD and compensation payment date (e.g., 15% per year for two years). According to the Project, in 2022, the Project commissioned a Third-Party Valuation Study in 2022 to assess land prices and land compensation rates based on market research (i.e., fair market value).³⁰ The Study confirmed that Project rates for land compensation were greater than the local market rate, which is in keeping with the RAP principle of asset compensation at full replacement value.³¹

The majority of PAPs interviewed said that compensation rates, especially for land, were too low and they were unable to replace the extent of the land they lost. However, results from the 2022 Valuation Study³² supports that the compensation was fair and adequate (see Section 4.1.5.1.2). Furthermore, when asked why PAPs did not select the in-kind replacement land option offered by the Project, PAPs mentioned cash compensation as their preferred choice.

The Consultant Team assessed concerns raised by PAPs regarding the period of lost productivity between the CoD and the compensation payment date (i.e., a minimum of period of 21 months) where PAPs could continue subsistence farming but would no longer be compensated for improvements to the land. PAPs claimed that due to these restrictions they could not maximize their earnings. While valid, with the exception of Kasinyi Village³³, the compensation rates were higher than the market rate in 2022 and would more than account for this period of lost productivity. The Project attributes land rate increases in Kasinyi Village to “influx of people buying land around the project facilities (industrial area).³⁴

Ultimately, PAPs were provided with a choice in selecting which entitlement they could receive from the Project, in-kind or cash. When asked, PAPs indicated that they would select cash again, a strong indication that the rates were sufficient. Providing a choice between in-kind and cash is aligned with international good practice. Initially in Q4 of 2019, 1,706 PAP had qualified for replacement land. Of those initially qualified, 30 PAP continued with the process and the remainder selected cash compensation. Twenty-nine (29) PAP have been provided with replacement land, and one (1) case has been referred to the Attorney General due to discrepancy in land use from original agricultural

²⁹ Disturbance allowance is a statutory requirement (see Ministry of Lands, Housing and Urban Development: Guidelines for Compensation Assessment and Land Acquisition (June 2017)).

³⁰ The Consultant Team reviewed the Excel analysis obtained from the Study as provided by the Project. The Consultant Team did not review the Study prepared by Associated Engineering Surveyors (Sept 2022).

³¹ Other international projects have a practice of applying two rates: government-approved rates and replacement market rates, which are usually higher. In those cases, PAPs have two compensation schedules, one with the approved government rates and another with the additional payment (top up) resulting from the rate difference. The objective is the same: to ensure compensation is equal to or greater than the replacement rate.

³² 20190417_Land Values RAP1_2_3A_4and_5 REV1 (Comparison 2022 survey).xlsx.

³³ 56 villages were included in the 20190417_Land Values RAP1_2_3A_4and_5 REV1 (Comparison 2022 survey).xlsx.

³⁴ Submission of Additional Information and Clarification by TEPU (March 04, 2025), TEPU.

land to PAP identified industrial land. The Project has been successful in verifying PAPs have reestablished access to land as demonstrated by the 3,503 PAP farms that have been physically verified by the AGSS contractor.

4.1.5.1.3 Asset Valuation

The GCALA Guideline states that “after each individual has been assessed, he/she signs and retains a copy of the assessment form.”³⁵ The Consultant Team takes that to mean that the form is retained at the conclusion of the assessment. From the Valuation Forms reviewed, the Consultant Team was able to establish that the Valuation Form was not signed on site on the day of the assessment. Atacama confirmed that the asset registers were not signed on site on the day of the survey because they had to be reviewed and approved by a Senior Valuer as part of the QA/QC process. However, best practice and the GLACA process requires that the Valuer and the asset owner agree on the asset inventory and sign in duplicate (i.e., Form B) on the day of the survey before the Valuer leaves the location. The asset owner is to retain a copy of the Form for future reference.

Based on further discussions with TEPU, in the course of preparing the Form, the following occurred:

- Valuer entered assets in an asset register.
- PAPs took their own notes about the asset count, what was included in the register, with assistance as needed.
- Government and LC representatives took their own notes.
- Valuer transferred identified assets from the asset register to Form B off-site to conduct QA/QC.³⁶
- The valuer returned Form B for PAP's and other signatures at a later date.³⁷

The Form B: Property/Asset Inventory Assessment Form was used to generate compensation agreements. Form B included an inventory of all impacted assets owned or accessed by individual PAPs. Form B was signed by the following:

1. PAP, spouse and witness
2. Local Council (LC) 1 Chairperson
3. Valuer
4. TEPU/Tullow Representative
5. Chief Government Valuers Representative
6. Ministry of Energy and Mineral Development representative

With the exception of the LC1 Chair, there is no confirmation of the date upon which the other signatories on the Valuation Form signed the Form. However, only the LC1 Chair's signature is vital

³⁵ GCALA, 2017, Appendix 1, page 26.

³⁶ Interview with Juliana Keirungi, Senior Partner, Atacama, on Oct 31, 2024.

³⁷ One reviewed Form B had a reference date of 31st/01/2019; translation date of 26/02/2019; LC1 signature date of 01 Mar 2019.

as a witness, so the Valuer and the PAP should first agree on the count and sign the Form, with the LC1 Chair as witness on site during the survey. Furthermore, it is becoming standard practice to facilitate the presence of third-party observers knowledgeable about the compensation process as a resource for PAPs. This departure from the Guidelines was a QA/QC measure employed by Atacama.

If PAPs disagreed with the inventory identified in Form B, they had the ability to dispute the inventory through the Concerns and Grievance Mechanism. Project files indicate that there were 340 cases where Addendum Valuation Reports were approved by the CGV to address disputes raised within the Grievance Management Process.

154 cases that were not resolved through the Concerns and Grievance Mechanism were escalated to MEMD, which consisted of 10 valuation grievances, 7 absentee PAPs and 137 disputes among PAPs. Of these, 107 were resolved through a negotiated resolution and 15 were resolved through the MLUHD-appointed Assessment Officer. The remaining 32 cases were escalated to court proceedings (the total number of PAP that participated in court cases were 42). Ultimately, 2 cases resulted in a court-ordered eviction.

4.1.5.2 Assessment of Compensation and Entitlement Delivery Effort

The Consultant Team's findings confirm that the core compensation commitments are being met. The Project disclosed compensation agreements to 4,954 PAPs. As of December 2025³⁸, the Project indicated it had paid compensation to 4,927 PAP according to their compensation agreement. The Project also indicated that it has placed payment in ESCROW for 27 PAP who have not yet signed their agreement.

All 205 physically displaced PAPs received replacement houses and 29 households have received replacement land (with the exception of 1 PAP, as noted in Section 2.5), in accordance with eligibility and preference criteria.

Aside from asset identification, verification of procedures confirmed that the compensation process followed key RAP and IFC PS5 principles, including cadastral surveys, market valuation approvals by the CGV, and formal disclosure of agreements. The Project also implemented both primary and secondary CoDs to help manage speculation. The entitlement packages offered a choice of compensation modalities and met the core procedural requirements for fairness and transparency.

Review of outstanding grievances and field-reported concerns confirmed that most of these are compensation-related concerns and have been addressed through existing Project mechanisms. Remaining concerns are primarily linked to legacy issues from early implementation stages, such as perceptions of valuation fairness, land allocation choices, and eligibility questions, rather than deficiencies in entitlement delivery. These concerns are being addressed through ongoing case-specific follow-up.

4.2 Livelihood Restoration

Restoration of livelihoods following land acquisition and displacement is central to meeting IFC PS5 and RAP commitments. The Project implemented a range of livelihood support activities involving

³⁸ Project Correspondence, December 21, 2025

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agriculture, business, vocational training, and transitional assistance through its implementing partners. The evaluation of program effectiveness increasingly relied on household-level tracking and verification, including use of the KYP tool. This section assesses how livelihoods have been restored, sustained, or improved, and how households are positioned for livelihood transition and RAP closure.

4.2.1 Program Commitments

The following analysis examines the design and implementation of the Project's livelihood restoration programs, including agricultural support, vocation training, and business assistance.

The Project's policy incorporates several key livelihood definitions³⁹:

Economic Displacement: *Loss of income streams or means of livelihood caused by land acquisition or obstructed access to resources (e.g., land, water, forest, etc.) resulting from the construction or operation of the Project or its associated facilities. For example, economic displacement can result from loss of access to farmland and can occur without physical displacement occurring.*⁴⁰

Livelihoods: *Refers to the full range of means comprising of capabilities, assets (including both material and social resources), and activities required for individuals, families, and communities to generate an income to secure the necessities of life.*⁴¹

Livelihood Improvement: *Refers to programs or measures designed specifically to improve the assets, levels of economic productivity, and/or standards of living to above pre-project levels. Livelihood improvements in the context of this document are targeted to displaced people whose livelihoods are affected by the project. Livelihood improvements are required as part of the resettlement action plan to conform to the spirit and intent of Performance Standard 5.*

In terms of livelihood restoration, LARF policy includes the following guiding principles⁴²:

- It will follow an integrated approach aimed at sustainable local development, using existing opportunities as much as possible, and promoting partnership and collaboration in view of long-term sustainability.
- It will focus on the enhancement of livelihoods through the improvement of income, increased production and a better quality of life.
- It will ensure that land-based programs are discussed and agreed to with affected communities only if replacement land is available and secured. When there is insufficient replacement land, other measures such as improving of productivity of remaining land or training/capacity building will be explored.
- It will equally endeavour to re-establish existing business enterprises and provide additional support to business owners in order to improve business operations (marketing, administration, operational efficiency) through training and other support measures.
- Livelihood restoration will be the focus of all monitoring and evaluation programs until after completion of the resettlement to assure that the Project has successfully restored and improved livelihoods and standards of living.

³⁹ RAP 2, pages 284-285.

⁴⁰ See definition in LARF, page 82 and RAP 2, page 282.

⁴¹ RAP 2, page 285.

⁴² LARF, page 70.

RAPs 2-5 livelihood principles echo the following:

- LR will focus on the enhancement of livelihoods through the improvements in productivity and use of technology, diversification of livelihoods activities to adapt to the changing context, resilience and social capital construction, and a better quality of life.
- LR will equally endeavour to re-establish existing business enterprises if these are impacted by the infrastructure and provide additional support to business owners in order to improve business operations (marketing, administration, operational efficiency) through training and other support measures.
- Monitoring and evaluation will continue until the Project has successfully restored and improved livelihoods and standards of living.

Further direction to the assessment of livelihood impact and categorization of loss is provided in the LARF.⁴³ Additional direction is provided with respect to entitlements for economic displacement (LARF 2019, page 39).

Within the RAPs 2-5, the type of livelihood loss, category of affected, entitlement options, and eligibility are captured in the entitlement framework. Further guidance on livelihood mitigation entitlements is provided in the GLRP. These are described in Appendix E.

4.2.2 Program Process

During implementation of the LRP, the Project utilized Livelihood Coaches who interacted with PAPs to assist in clarifying needs and preferences of PAHs in terms of defining livelihood packages at a household level. PAHs were ranked according to a “Four Level Pyramid” (Appendix F), which further defined households who were to receive enhanced vulnerable packages based on an assessment of 1,744⁴⁴ PAHs (“intensive” vs “general” impact).

Based on the results of the LiME Survey, PAPs were then allocated a package of livelihood supports from a program of support to be delivered by Implementing Partners:

- Eco Consult, for delivery of transitional support in the form of food baskets;
- Living Earth, for delivery of Agricultural Support Services (AGSS) (See Appendix G, Tables G-2, G-3);
- Sunmaker, for delivery of financial literacy, small business support and vocational training, and job seeker support.

Mitigations associated with livelihood programs are shown in Appendix G.

⁴³ LARF, pages 39, 55-59, and 144.

⁴⁴ Tilenga 2-5 Aggregated Households Database LR Ranking (Tilenga, 2023).

4.2.3 Key Findings Recommendations

4.2.3.1 Key Findings

The RAPs did not quantify impacts related to livelihoods, other than impacts to businesses (see Appendix B). Socio-economic baselines that describe PAPs' general livelihood strategies were included in the RAPs. Subsequent livelihood survey information was collected during the LiME survey process undertaken in Q4 2021. Although not initially quantified in the RAPs, the existing database is a resource for understanding direct livelihood impacts of land acquisition. Both the cadastral surveys and asset surveys serve as resources. Appendix G outlines the Project's livelihood process and quantifies impacts collected during the census and asset inventory and outcomes of current livelihood programming.

4.2.3.1.1 Restoration of Farm-Based Livelihoods

The Project acquired a total footprint of 2,108 acres of compensated⁴⁵ land within RAPs 2-5, 658 acres (32% of which was cultivated (i.e., farmland). For PAPs whose livelihoods were directly impacted, 1,498 PAPs (30% of all PAPs) were compensated for agricultural land while 2,433 (49%) were compensated for the loss of either annual or perennial crops for a total of 3,931 PAPs who experienced impact to agricultural livelihoods.

The Project's livelihood programming has, in general, successfully facilitated access to agricultural land and essential farming inputs. Project data indicates that, through livelihood programming activities, 3,503 PAHs have verified access to land for the purposes of farming⁴⁶. This indicates that the Project has tracked and, within the in-kind land replacement component, directly facilitated the restoration of access to agricultural land. Project data also indicates that 3,503 PAPs have received crop improvement services while 702 PAHs have received tree nursery services. While these groupings are not mutually exclusive, it nonetheless indicates that the initial phase of the land-based programming has delivered on training and inputs essential for restoring farm-based subsistence livelihoods (see Appendix G, which lists the number of PAPs who received the respective livelihood mitigations). This finding was supported by PAP interviews, surveys and field observations.

The agricultural livelihood restoration programs, particularly the provision of inputs such as groundnut and maize seeds, as well as cassava cuttings, were suitable for both male and female-headed PAHs. These inputs helped address the risk of food insecurity caused by Project land acquisition, thereby meeting a critical need for both genders. The programs were also aligned with the primary occupation of PAPs, as both men and women practiced crop farming before the Project and continue to do so. Additionally, both male and female PAPs have access to land through direct ownership, family arrangements, or renting.

The Project is investing in livelihood transition programming within the Agricultural Development Program (ADP) Phase III Program. The Program aims to facilitate access to markets for targeted commodity value chains under ADP Phase I and II, and support livelihood restoration and community agriculture. It targets support to 124 farmer groups from within the Program area of operation. The

⁴⁵ State land did not necessitate compensation.

⁴⁶ Farm verification was a component of LEU training and input delivery per September 2024 LEU interview,

program aims to increase the physical presence of market actors in the Project area of influence through co-investment in aggregation and processing facilities; strengthen the capacity of Farmer Producer Organizations; put into operation an inclusive agribusiness model; and build productive alliances among Farmer Producer Organizations. The ADP Phase III has initial funding for a 3-year cycle.

However, it must be noted that there are several PAP-specific concerns related to quality of inputs (e.g., LEU reported 24 PAP who complained of dried or wasted casava cuttings within a 5 year period (2019-2025). The AGSS contractor reported that it had implemented mitigations to counter reported, isolated plantings, dry cassava cuttings and low attendance at meetings and trainings during other social events. It must also be noted the majority of PAPs indicated that land access is more difficult to secure as landowners and clans hold onto land in the hopes that it will be acquired by the Project in the future. Despite this claim, PAPs have successfully secured or re-established land access under which they are continuing with agricultural-based livelihood activities.

4.2.3.1.2 Restoration of Livestock Rearing Livelihoods

The Project's livestock-focused livelihood restoration efforts have provided essential support for grazing-based activities, although some quality and delivery concerns with livestock inputs require resolution before program closure.⁴⁷ The Project acquired a total footprint of 2,108 acres of compensated land within RAPs 2-5, of which 1,451 acres (68%) was non cultivated (i.e., potential grazing land). Of PAPs whose livelihoods were directly impacted, 365 PAPs (7% of all PAPs) were compensated for land only, indicating underlying use and non-cultivation or grazing use. In terms of livelihood restoration activities that had a focus on livestock inputs (e.g., provision of goats or bulls and livestock training) or land-based inputs (e.g., provision of pasture inputs and pasture land management training), 2,880 PAHs received livestock improvement support, indicating that the initial phase of livestock services has delivered on training and inputs essential for restoring livestock-based subsistence livelihoods. This finding was supported by PAP interviews, surveys, and field observations. It must be noted that there are several PAP-specific concerns related to the quality (e.g., sick or dead goats) or delivery (e.g., goats not delivered) of livestock inputs that will need to be resolved prior to the closure of the initial livelihood phase. The AGSS contractor reported that it had implemented mitigations to counter reported loss of livestock, lack of reporting on livestock health and low attendance at meetings and trainings during other social events.

4.2.3.1.3 Restoration of Small Business

The Project's support for small business restoration has enabled affected entrepreneurs to re-establish operations. The Project directly impacted 60 businesses (1% of all PAPs) due to land acquisition activities. In terms of livelihood restoration activities, the Project has provided small business support services to 117 PAH under the small-scale business mentorship program and 30 business owners under the business incubation program indicating that the Project has supported the restoration of business activities. Of the small business operators engaged through the field surveys, all PAP business owners indicated that they had re-established their businesses through a combination of

⁴⁷ The AGSS contractor, Living Earth, is currently examining claims of poor variety or sick goats. Living Earth representatives also explained that PAPs who do not follow the training on livestock management practices, could potentially see illness or even fatalities with the improved variety.

finding an alternative business location, improved bookkeeping, and management of business activities..

4.2.3.1.4 Access to Resource Areas

Impacts to resource areas were anticipated in RAPs 2-5. These lands are primarily located in clan or family land or in the Lake Albertine Buffer (i.e., shoreline area). The RAP baseline indicated high usage (e.g., 92% in RAP 4) of resource areas, which was supported by PAP interviews, particularly women, who indicated that they continue to access forest areas. Most of these lands were directly compensated, with the exception of 49 acres in gazetted lands (wetlands) (2% of the RAP 2-5 footprint). Within the Project's Environmental and Social Management Plan (ESMP), land improvement and restoration policy has initially facilitated the replanting / restoration of 350 hectares of degraded habitat within its Corridor Restoration Program, which is focused on improving connections and linkages between forest reserves within the Project's area of influence. .

4.2.3.1.5 Access to Water Resources

Impacts to water access or water infrastructure were anticipated in RAPs 2-5. However, these impacts were not quantified in the RAPs. The Project reports that safe drinking water has been improved within impacted Villages through the Kirama water scheme and the rehabilitation of boreholes in Buliisa District.⁴⁸ TEPU has reported that the 7 boreholes targeted for replacement have been completed. These infrastructure improvements were not independently verified.

4.2.3.1.6 Alternative Livelihoods

In addition to impacted business mitigation, the Project has implemented vocational training programs as well as expansion of the small business support program to PAPs with business interest. Sunmaker has delivered a vocation training program and start up kits to 873 PAH focused on skills building in skilled and semi-skilled vocations from driver training to hair dressing. The program was popular with PAPs, and many PAPs reported satisfaction with the training.

4.2.3.2 Assessment of Livelihood Restoration Effort

Livelihood restoration programs have been largely implemented and have contributed to sustained and, in many cases, improved household-level livelihoods. The Project delivered agricultural support, transitional assistance, FLT, and business development services through Living Earth, Eco Consult, and Sunmaker. Evidence drawn from program records and PAP feedback indicates that the food security objective has been met, and that impacts to agricultural land, grazing land, and business income have been substantially mitigated. In many cases, PAPs have access to improved agricultural practices and diversified income sources beyond those that existed before the Project.

To assess the effectiveness of livelihood restoration and readiness for closure, the Consultant Team assembled and analyzed longitudinal household-level data using the KYP tool. The tool drew on socio-economic and livelihoods data from the 2019 baseline survey, the 2021 LiME survey, and the 2025 Living Earth endline report to evaluate each PAH against key indicators, including land ownership and productivity, business and employment income, livestock performance, food security, participation in

⁴⁸ The Social Report 2024, TotalEnergies EP Uganda, page 15.

livelihood training, and membership in farmer organizations (see Appendix H for the full list of indicators).

Using these indicators, households were classified into three livelihood performance categories:

- **Profile 1:** Room for Improvement (24 PAHs, or fewer than 1%): households requiring further assessment or targeted support before closure.
- **Profile 2:** Maintaining (875, or 22.1% of PAHs): households sustaining basic livelihoods at pre-Project subsistence levels, with potential to consolidate progress.
- **Profile 3:** Doing Well / Excelling (3002, or 75.8% of PAHs): households demonstrating resilience, improved productivity, and preparedness to pursue market opportunities beyond the Project period.

The KYP analysis indicates that overall, approximately 98% (the combination of households in Profile 2 and 3) of PAHs are either maintaining or improving their livelihoods at pre-Project levels (the number of PAHs in each of the KYP Profiles is shown in Appendix H along with PAH livelihood performance against KYP indicators). Looking at household income specifically, aligning with IFC PS5 and established international resettlement practice, livelihood restoration is assessed at a group level. Restoration is considered achieved when a substantial majority (from 70–80%) of affected households demonstrate sustained income levels equal to or greater than pre-displacement baselines, with continued targeted support for remaining households. Based on KYP income data analysis, 85% of PAPs are reporting incomes equal to or greater than their pre-Project incomes. A small subset of households (24, or 0.6%) remains in Profile 1. The categorization of PAH livelihood performances now provides the Project with a clear basis for determining tailored next steps, including targeted post-RAP support, long-term sustainability linkages, and transition planning within the AGDP Phase III Program.

Taken cumulatively, the findings show that livelihood restoration has made meaningful progress toward completion, and that most PAHs are positioned for transition, consolidation, and long-term development planning.

The findings indicate that the Project's livelihood restoration programming is consistent with the policies and commitments set out in the RAPs.

4.2.3.3 Recommendations

1. Monitor PAHs in Q1 2026 to ensure completion of entitlements delivery and use of LRP training.

4.3 Vulnerable Support Program

The RAPs recognized that some households may face additional challenges that standard compensation alone could not address, including those linked to disability, age, limited economic capacity, or specific Project impacts. The Vulnerable Support Program was designed to identify those households and provide intensified or tailored support where needed. Over the course of the Consultant Team's missions, the Project's vulnerability assessment approach became more refined

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and evidence based. This section evaluates how vulnerability was identified, classified, and verified, and assesses readiness for closure of remaining vulnerable cases.

4.3.1 Program Commitments

The RAP commitments for the Vulnerable Support Program aimed to support the most affected and at-risk PAPs through delivery of targeted resources and assistance. Key commitments included⁴⁹:

- **Identification of Vulnerable PAPs:** Ensuring accurate identification of vulnerable groups, including individuals with disabilities, elderly, female-headed households, and those with limited economic resources.
- **Additional Assistance and Resources:** Providing prioritized and intensified support, such as in-kind resources (e.g., seeds, livestock), livelihood training, and financial literacy programs.
- **Sustainable Livelihoods and Economic Resilience:** Through collaboration with partners like Living Earth, the program aimed to improve the income generation and asset-building ability of vulnerable PAPs.

4.3.2 Program Process

Steps in the process included:

- **Socio-Economic Survey (SES) (2018):** Conducted to assess PAPs' initial socio-economic conditions and needs, allowing for initial categorization and identification of vulnerability.
- **Livelihood, Monitoring and Evaluation (LiME) Survey and Intensive Support Assessment (2021):** A tiered survey (tiers 1-3) to understand levels of need and allocate tailored support.
- **Transitional Support and Livelihood Implementation (2021 / 2022 – Ongoing):** Consisting of delivery of transitional support by Eco and Partner Consult Ltd. and livelihood programming by Living Earth Uganda Ltd., Financial and business capacity services by SunMaker Energy both tailored for intensive and general impact households (as determined through household factors identified in the Census and the LiME Survey).
- **CLO Management:** CLOs were instrumental in tracking ongoing needs and communicating updates and raising awareness of resources to PAPs.
- **Field Monitoring and Follow-Up Surveys (Ongoing):** Periodic assessments to monitor the effectiveness of support, identify emerging needs, and ensure sustained benefits.

Mitigations associated with the Vulnerable Support Program are shown in Appendix G.

4.3.3 Key Findings and Recommendations

The following Key Findings are based on interviews and survey results:

4.3.3.1 Assessment of Vulnerable Support Program Effort

The Project has demonstrated a structured and evolving effort to meet its commitments under the Vulnerable Support Program, which include accurate identification of vulnerable persons, provision of

⁴⁹ Commitments are identified in Chapter 12 of RAPS 2-5, 'Vulnerable Households.'

intensified assistance, and facilitation of sustainable livelihood restoration for at-risk households. Early vulnerability screening within RAPs 2-5, which identified 1,958⁵⁰ potentially vulnerable PAHs, relied on broad categorization through socio-economic surveys, which was then later refined through the LiME survey process that identified 306 vulnerable PAHs. However, these initial tools were not sufficiently calibrated to distinguish pre-existing vulnerability from vulnerability resulting directly from Project impacts. This limited the ability to prioritize those households requiring tailored support aligned with IFC PS5 obligations.

Following an initial assessment by the Consultant Team, the approach matured into a more systematic and evidence-based vulnerability assessment. Utilizing the KYP methodology, the Project now applies longitudinal and household-specific livelihood data. The Consultant Team confirmed that this improved methodology has significantly strengthened the ability to identify cases of likely Project-induced vulnerability.

The final validated assessment confirms that overall vulnerability within the affected population is lower than originally anticipated. A total of 20 out of the LiME-assessed 306 households have been identified as potentially vulnerable, including 12 cases likely linked to Project-induced circumstances. A further 7 households require further assessment. For these households, individual follow-up remains essential to ensure that remaining obligations are met and that future livelihood supports and monitoring efforts are appropriately tailored. 24 PAHs were not available during the initial assessment, although through the KYP analysis, they have been identified as Profile 2 (8) and Profile 3 (16) households and further assessment is not required.

The Project has successfully strengthened the identification of vulnerable households, reduced initial uncertainty, and produced a credible set of verified cases. However, to meet its closure obligations, the Project will need to ensure that these households receive tailored, tracked, and targeted assistance aligned with their specific vulnerability context, and that outcomes are monitored to confirm restoration of living standards in accordance with RAP commitments and IFC PS5 requirements.

While the Vulnerable Support Program process currently complies with RAP requirements, additional measures must be completed prior to RAP closure (see Section 4.3.3.2).

4.3.3.2 Recommendations

The following measures are recommended to meet the Project's commitments with respect to its Vulnerable Support Program:

1. Deliver vulnerable assistance measures to confirmed vulnerable households, including, but not limited to livelihood training and inputs, transitional support, and measures tailored to specific household needs.
2. Liaise with local government to support vulnerable PAHs' access to existing government services.

⁵⁰ See Section 12.4 of RAPs 2-5.

3. CLOs to conduct vulnerable assessments of 7 PAHs identified in Consultant Team Mission 4 as potentially experiencing Project-induced vulnerability and, if Project-induced vulnerability is found, deliver final mitigations / support.

4.4 Concern and Grievance Redress Mechanism and Management

Effective grievance and concerns management is essential to ensuring that concerns raised by PAPs are documented, addressed, and closed in a timely and transparent manner. The Project established procedures for both informal concern tracking and formal grievance resolution, involving CLOs, committees, and departmental review. Improvements were made to issue categorization, documentation, and tracking systems over the course of the missions. This section assesses the functionality and adequacy of the Project's Grievance Redress Mechanism and its readiness to support RAP closure.

4.4.1 Program Commitments

The RAP CGM was designed to offer PAPs a clear, accessible, and structured way to voice concerns related to resettlement, compensation, and livelihood impacts. Commitments included:

- **Establishing Concerns and Grievance Redress Mechanisms:** The project committed to a formal system where concerns and grievances could be recorded, tracked, and resolved, with escalation mechanisms for unresolved concerns.
- **Timely Feedback and Resolution:** Ensuring concerns and grievances would be addressed within a set timeframe to maintain transparency and trust among PAPs.
- **Role of CLOs:** CLOs were tasked with documenting concerns and grievances and providing PAPs with timely feedback, working closely with resettlement committees.

Resettlement Planning Committees (RPC): Local committees, based at Subcounty level. were established to manage and resolve grievances at the community level, helping PAPs escalate concerns when needed.

4.4.2 Program Process

The grievance process involved the following steps:

- **Issue Tracking Before Formal Grievances:** The Project recognized a two-track system, where concerns raised by PAPs were first tracked and addressed informally. These concerns were managed before escalating to formal grievances. This approach allowed many concerns to be resolved early, reducing the burden on the formal grievance system.
- **Initial Filing with CLOs:** PAPs could file concerns and grievances through CLOs, who recorded the complaint, provided information on next steps, and ensured concerns and grievances entered the tracking system.
- **Committee Review and Escalation:** The RPCs managed grievances locally. For unresolved cases, grievances were escalated to higher project authorities or a grievance review committee for further deliberation.

- Monitoring and Reporting:** A tracking system was intended to log all grievances, provide status updates to PAPs, and ensure consistent follow-up until closure. However, evidence suggests gaps in tracking and feedback loops, which need to be addressed.

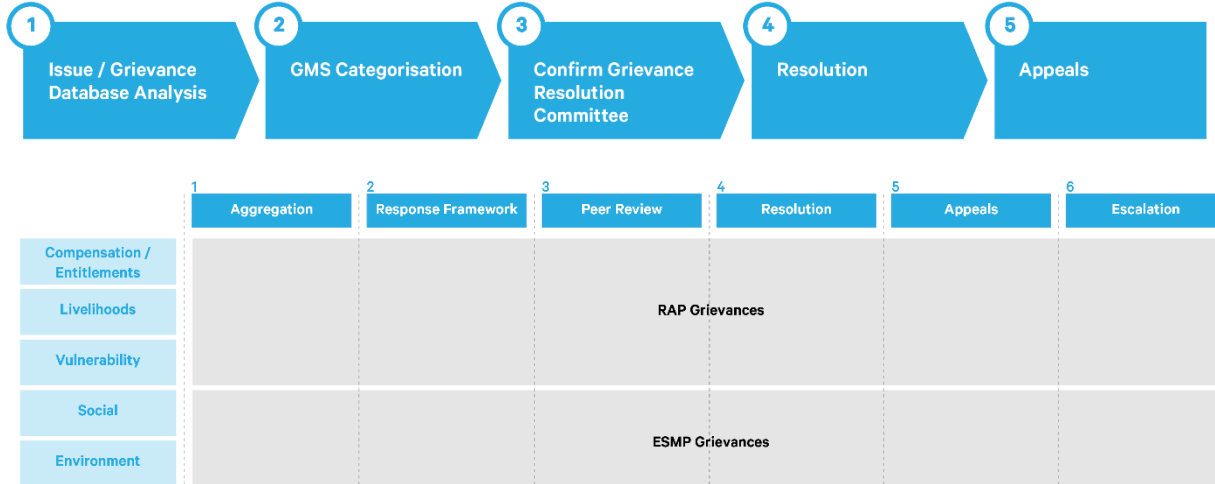


Figure 4: Recommended Concerns and Grievance Closure Process

4.4.3 Key Findings and Recommendations

4.4.3.1 Findings

As of March 2025, according to the Project, 711 grievances were registered, covering the RAP planning (621 grievances) and implementation stages (90 grievances). Of the planning-related grievances, 621 (or 100%) have been closed, including five grievances that were escalated to the Government of Uganda. Of the implementation related grievances, 89 (or, 96.6%)⁵¹ have been closed, including 5 grievances escalated to the Government of Uganda, for an overall grievance closure rate of 99.9%.⁵²

Table 4 reproduces the Project’s grievance closure progress as reported to the Buliisa DIRCO on March 28, 2025.

⁵¹ As noted in Section 2.5, the remaining PAP is seeking to replace agricultural land with industrial land of a higher value. Once the PAP has identified replacement land, the Project will review and evaluate the PAPs choice.

⁵² DIRCO Presentation, 28 March 2025, page 12.

Table 4: RAPs 2-5 Grievance Closure Progress Summary (March 28, 2025)⁵³

Grievances (RAPs 2-5)	RAPs 2-5 Planning	RAPs 2-5 Implementation	TOTAL
Registered	621	90	711
Closed	621 (100%)	89 (98.9%)	710 (99.8%)
Unresolved-Escalated to [Attorney General]	05	05	10
Resolved but not closed	00	00	00
Unresolved (Completed investigation)	00	00	00
Open	00	01	00

Table 5 summarizes the concerns captured, by category, within the Project’s issues registry as of August 2025.

Table 5: Concerns by Category (August 2025)

Concerns	Open	Closed	Total
1. Compensation Concerns	13	164	177
2. Land Concerns	10	66	76
3. Livelihood Concerns	27	151	178
4. Management Concerns	17	217	234
5. Replacement House Concerns	44	89	133
6. Other ⁵⁴	34	22	56
TOTAL	145	709	854

From initial field findings, it was evident that while most PAPs were aware of the concerns and grievance mechanism, there was inconsistent satisfaction with the process. Common concerns included delayed feedback, perceived lack of fairness, and confusion over how to escalate grievances

⁵³ Reproduced from “Grievances (All RAPs) Progress Summary” table in “Quarterly Engagement Buliisa District Resettlement Planning Committee (DIRCO): Tilenga Project RAPs 2-5 Implementation, 28th March 2025, hereafter, ‘March 28, 2025 DIRCO Presentation’, page 12. Note that in the original, the percentage of closed Implementation grievances incorrectly appears as 96.6%.

⁵⁴ Includes open concerns representing other categories, including employment, safety and security, infrastructure, environment, communication and engagement, financial, social issues.

effectively. Interviews highlighted a reliance on informal channels (e.g., communication through local village chairmen) due to mistrust in formal systems.

Interviews with selected PAPs revealed that the grievance resolution process is equally accessible to both men and women through established grievance resolution channels, with the RPCs serving as the lowest level of grievance management.

The composition of the RPCs includes women representatives, making it easier for women to report their grievances. Feedback from both genders indicated they were able to lodge complaints; however, many were hesitant to do so due to uncertainty about whether their grievances would be addressed.

Both men and women expressed concerns about delayed feedback from the Project regarding the grievances or concerns they submitted.

At times, the Consultant Team observed that several individual PAPs continued to raise long-standing concerns related to compensation and delivery of livelihood inputs though many of the concerns raised had previously been resolved. This may have been the result of gaps in concerns tracking and communication rather than a systemic failure to address grievances and concerns.

Since the Consultant Team's initial field mission, the Project has made significant progress in resolving outstanding concerns, particularly compensation-, land-, and replacement house-related concerns. In addition, the Project's updated Grievances and Concerns Tracker reflects significant progress in implementing the Consultant Team's previous recommendations. Specifically:

- Standardized core fields have been introduced across all entries, reducing inconsistencies and improving the clarity of issue descriptions.
- Issue categorization has been strengthened, with structured fields for subject category, department, and initiative, facilitating clearer routing and accountability.
- Traceability has improved, with receipt and closure dates allowing more transparent tracking of turnaround times.
- Linkages to engagement activities are clearer, enabling CLOs and TEPU teams to connect specific concerns with ongoing outreach and follow-up actions.

These improvements demonstrate that the Project's concerns management system has been strengthened significantly since Mission 1.

4.4.3.2 Assessment of Grievance Management Effort

The Project has established a functioning concerns and grievance handling system, supported by CLOs, resettlement committees, and formal reporting channels, that is consistent with RAP commitments. The Consultant Team confirmed that PAPs are generally aware of the mechanism and have used it to raise concerns related to compensation, land, livelihood support, and household-level impacts. However, early reviews identified challenges related to inconsistent tracking, documentation, and communication of grievance outcomes to PAPs. These gaps often resulted in recurring grievances or concerns that had previously been resolved, suggesting that challenges were not primarily related to failure to address grievances, but rather to insufficient feedback and closure documentation.

Over time, the Concerns and Grievance Mechanism improved in consistency and structure. The Company introduced standardized fields and strengthened routing and categorization in the Grievances and Concerns Tracker, improving traceability, departmental accountability, and alignment between issue resolution and stakeholder engagement activities. These improvements indicate that many of the Consultant Team's early procedural and management recommendations have been substantively addressed.

Field engagement also confirmed progress in resolving longstanding compensation-, land-, and livelihood-related concerns, though some individual PAPs continue to raise concerns that had previously been addressed. This confirms the need for continued strengthening of issue-level communication, confirmation of closure, and clearer messaging on how and when grievances are considered resolved, especially for legacy cases.

4.4.3.3 Recommendations

The following actions are recommended to affect timely resolution of grievances and concerns:

1. In addition to what is currently done for grievances, present an up-to-date Concerns Tracker as a standing agenda item at all DIRCO and RPC meetings to show outstanding concerns.
2. Develop a set of FAQs and Key Messaging Bulletins to provide clear, consistent answers to recurring questions and concerns raised by PAPs, District officials, RPC and DIRCO members, and other stakeholders. These should be widely used by CLOs and district counterparts in daily interactions with PAPs to reduce repetition of concerns and questions and ensure transparency.
3. Record the status of all remaining concerns in the Project Concerns and Response Table to facilitate communication with PAPs and support the Grievance Committee to act upon any active concerns that require escalation to grievances.

4.5 Engagement and Disclosure

Stakeholder engagement and disclosure activities have been central to the implementation of the RAPs and have supported awareness of compensation procedures, livelihood options, and PAPs' rights. The Project engaged PAPs and community representatives through village meetings, RPC and DIRCO sessions, and direct household visits. The Consultant Team observed both strengths and areas where communication clarity could be reinforced. This section evaluates the consistency, accessibility, and effectiveness of engagement and disclosure efforts.

4.5.1 Program Commitments

Stakeholder Engagement was initiated at the exploration stage of the project sequence, continued through the development of the LARF, disclosure of the resettlement planning process in 2018, and throughout the Project-planning phase. Stakeholder engagement will continue into the implementation and monitoring phases.⁵⁵ The RAP Gap Analysis identified a discrepancy between IFC Performance

⁵⁵ Stakeholder engagement is described in Chapter 6 of the RAPs.

Standards and Ugandan Regulations with respect to Consultation and Information Disclosure. To meet the higher IFC standard, the Project, the Project committed to PAPs and host community participation in resettlement planning.⁵⁶

⁵⁶ RAP 2, Table 3.1, page 30.

As stated in the RAPs:

The aim of stakeholder engagement within the resettlement process is to ensure that all interested and affected parties are informed and involved throughout the project activities, while being provided with the necessary information to influence and participate in the resettlement planning decision-making process.⁵⁷

With RAP Principle 4 (Active and informed stakeholder participation) commits, the Project committed to:

PAPs, including host communities, will be adequately informed and consulted on all matters that affect them and will participate in decision making related to the planning, implementation, monitoring and evaluation phases of the land acquisition and resettlement activities. This will include providing access to appropriate advice to ensure that they understand their rights, responsibilities and options.⁵⁸

4.5.2 Program Process

Beginning in 2018, stakeholder engagement focused on identifying and prioritizing affected and interested stakeholders within the Project areas with a view to establishing and managing stakeholder relationships throughout the resettlement process.

4.5.2.1 Stakeholder Mapping

As described in Section 4.5.1, stakeholder engagement has been ongoing since the exploration stage and enhanced to facilitate engagement with PAPs during development and disclosure of the RAPs. According to the RAPs, a stakeholder mapping exercise was undertaken to identify parties affected by and interested in the Project and a RAP Stakeholder Engagement Plan (SEP) was created. The mapping exercise identified all the stakeholders in the area, including local communities, local administrative organizations, academia, NGOs, and private sector entities (e.g., businesses), among other stakeholders. It is evident that continuous engagement has been carried out with the following general groups:

- Central and local government
- Civil society; including NGOs and religious organizations
- Communities (PAPs as well as communities at large)
- Businesses

4.5.2.2 Key Organizations and Committees

The Stakeholder Engagement team carried out several activities throughout the resettlement process in collaboration with Project staff and representatives of the MEMD and MLHUD. Engagement activities were carried out with the wider affected communities and individual PAPs through the

⁵⁷ RAP 2, page 97.

⁵⁸ RAP 2, page 14.

DIRCO, RPCs, and RAC. The DIRCO and RPCs played an important part in the dissemination of Project information to PAPs, participating in the development of the entitlement and compensation frameworks, and providing input on the resettlement process generally.

4.5.2.3 *Disclosure*

Disclosure focused on the following key resettlement activities and milestones:

- Detailed Due Diligence (Asset Inventory, Cadastral Land Survey, Legal Due Diligence and Socio-economic Surveys).
- Communication of the CoD
- Strip Map Disclosure and PAP Verification
- Community Meetings on Entitlement Matrix, resettlement and livelihood restoration options, and replacement house design model
- LiME Survey, Livelihood Restoration Programs

4.5.2.4 *Monitoring and Reporting*

2024 stakeholder engagement activities are documented in two quarterly reports Stakeholder Engagement, Concerns, and Grievance Management reports. The report for Quarter 1 2024 is dated June 6, 2024, the Quarter 2 report we received is not dated.⁵⁹ The quarterly reports detail grievance and stakeholder management activities undertaken by the Project and authorities in Contract Area 1 (CA-1) and License Area 2 (LA-2).

During Quarter 2, the TEPU developed the Total Energies EP Social Report, which documents the Project's commitment to managing social risks and impacts associated with the Project. Communities and community members, contractors, and other organizations have been engaged on the Project's grievance and concerns management mechanism. Engagement occurred with the following groups and organizations, among others:

- Engagements with PAU
- NGOs
- National Tourism Associations and Operators
- Civil Society Coalition on Oil and Gas
- Nwoya, Buliisa, Pakwach and Masindi District Local Governments and area MPs.
- Households (138 engagements reached 2,755 households)
- Muchison Falls National Park on rig movements
- Inter-Religious Council of Uganda

⁵⁹ Stakeholder Engagement, Concerns And Grievance Management, Quarter 1 Report, 2024 (June 6, 2024) and Tilenga Stakeholder Engagement, Grievance And Concerns Management, Quarter 2 Report, 2024 (n.d.).

The Project prepared additional reports on the DIRCO and RPC meetings held During Q1 of 2025. The DIRCO and RPC meetings present detailed RAP implementation information including compensation payments, grievance and dispute resolution updates, transitional support, livelihood program updates and monitoring and evaluation updates.

4.5.3 Key Findings and Recommendations

4.5.3.1 Key Findings

The Project has and continues to consult with government, civil society, communities, and businesses. The DIRCO was an especially useful forum for consultation, All PAPs reported they were consulted during the compensation process and, crucially, prior to compensations being made, though the frequency of consultation varied by PAPs. Disclosure occurred around food rations as well as the GLRP. The majority of PAPs reported that they were consulted on replacement houses and replacement land.

However, less than 20% of PAPs reported that they did not understand key elements of the compensation process or that consultation was sometimes inadequate.

PAPs have experienced frustration with the Project's response to grievances and concerns that they have raised. PAPs have reported several concerns to the Project with respect to resettlement houses and have not received responses. During Mission 1, the houses occupied by the PAPs reporting concerns were still under Defects Liability Period, however, all house defects were resolved by the close of the defects liability period in July 2025.

Some PAPs disgruntled about compensation have not made a formal communication to the Project. These PAPs must have the opportunity to access proper channels of communication in order to close out the compensation and livelihood restoration programs.

4.5.3.2 Assessment of Engagement Effort

The Project has undertaken a broad range of engagement and disclosure activities that align with RAP commitments and the Stakeholder Engagement Plan. Evidence confirmed that PAPs were informed prior to and during key stages of RAP implementation, including disclosure of CoDs, compensation eligibility, entitlement options, and replacement house designs. Engagement was undertaken through village meetings, District and Resettlement Committees (RPC and DIRCO), CLO-led household visits, and direct communication with PAPs. PAPs consistently demonstrated awareness of core elements of the resettlement process, particularly compensation procedures and entitlement choices, confirming that early disclosure and engagement commitments were substantially met.

The Consultant Team observed that earlier engagement formats relied heavily on structured, forum-style quarterly meetings, which supported consistent messaging across communities. In later periods, engagement shifted toward a mix of individual meetings and follow-up phone communications. While still active, this change occasionally reduced the consistency of messaging, leading to instances of mixed or unclear information within communities. This was addressed in 2025, when RPC and DIRCO meetings once again became more structured, and the Consultant Team was able to observe these sessions as part of fieldwork. These sessions reinforce that structured, committee-based engagement

remains an effective platform for ensuring clarity, alignment with RAP objectives, and consistency in project communication.

The Consultant Team noted that PAPs continued to raise similar questions and concerns across repeated engagements, suggesting that the availability of clear, standardized key messages would better support transparency and consistency. As PAPs, District officials, CLOs, and committee members frequently reference similar concerns, the development and use of Frequently Asked Questions (FAQs) and Key Messaging Bulletins would help provide more uniform explanations and reduce repeated uncertainties.

Overall, engagement and disclosure efforts were found to be active, ongoing, and consistent with RAP commitments. The engagement framework has remained functional, with structured forums such as RPC and DIRCO meetings providing effective platforms for information sharing.

4.5.3.3 Recommendations

The following actions are recommended to achieve RAP closure:

1. As recommended in Section 4.4.3.3, the Project should develop a set of FAQs and Key Messaging Bulletins to provide clear, consistent answers to recurring questions and concerns raised by PAPs, District officials, RPC and DIRCO members, and other stakeholders, to be used by CLOs and district counterparts in daily interactions with PAPs to reduce repetition of concerns and questions, ensure transparency, and achieve resolution of grievances and concerns.
2. Prepare a focused engagement plan on RAP and Phase II Livelihoods Programming closure.

4.6 Gender Considerations and Mainstreaming

The RAPs and Gender Management Plan set out commitments to ensure that women and men benefit equitably from compensation, livelihood support, land rights, and participation in decision making. Gender-sensitive procedures, including spousal consent and joint titling, were embedded in key resettlement processes. However, documentation showing data and outcomes separately by gender has been limited across implementation records. This section assesses how gender commitments were operationalized and where further documentation may be needed.

4.6.1 Program Commitments

4.6.1.1 Gender Management Plan

The Project prepared a GMP⁶⁰ in 2023 with the aim of addressing the potential adverse gender-related risks and impacts associated with the development of the Project through mainstreaming gender in all Project activities, including the RAPs. The GMP lists potential gender-related impacts along with proposed mitigations, key performance indicators, and monitoring frequency and responsibility. The potential impacts listed in the GMP are grouped into the following categories⁶¹:

- Social-economic-cultural change including Project-Induced In-Migration, Gender-Based violence (GBV) and harassment, and SEA
- Land access and resettlement
- Project related employment opportunities (access to, recruitment, enabling environment, etc.)
- Increased economic opportunities associated with supply of goods and service

According to the GMP, the Project has made the following commitments related to land acquisition and resettlement, among others⁶²:

- Gender sensitive asset assessment / valuation
- Encourage joint bank accounts (husband and wife)
- Spouse consent as a requirement for compensation for land from which household derive its livelihood except land owned by the clan
- Compensation should benefit the family
- Replacement family land titles should bear names of wife and husband except for land owned by the clan
- Legal aid including training women and youths on land rights
- Capacity building on financial management
- Building the skills of women and girls through on-job-training and apprenticeships
- Incorporate in contractors' requirements gender fair hiring of workers
- Develop gender sensitive guidelines for land access, resettlement and livelihood restoration
- Translate and disseminating guidelines to both men and women
- Gender empowerment programs (GBV training)
- Building capacity of women and girls to enhance their self esteem
- Ensure spousal consent in land access, resettlement and livelihood restoration interventions

⁶⁰ Gender Management Plan Rev.: page1 (April 14, 2023), hereafter cited as "GMP."

⁶¹ GMP, Table 2, pages 14-25.

⁶² GMP, Table 2, pages 14-25.

- Resettle PAPs within the same locality
- Ensure resettlement sites have easy access to social services like water and health facilities
- Make available alternative livelihood interventions to women and men adversely affected by physical and economic displacement.
- Implement gender-sensitive social programs for vulnerable members of the affected communities.

4.6.1.2 Commitments in RAPs 2 – 5

The following Project commitments, located in the RAPs, are important to mitigation of gender-related risks:

- With respect to grievance management, RAP principles include:

***Equitable:** the [grievance] mechanism must ensure that aggrieved stakeholders have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair and equitable terms.*⁶³

The equitability principle automatically provides equal access to the grievance redress process for both genders.

- RAP implementation procedures should uphold “the rights of rights of women, orphans and children [within PAHs] in respect to the land / property where they stay and/or derive sustenance... This includes seeking the consent of spouses and or children representative(s) before resettlement compensation payments are made... This will ensure that the RAP process does not lead to further vulnerabilities associated with gender and childhood.”⁶⁴
- With respect to compensation payments, the Project proposed to offer a variety of supports, including providing transportation to payment events and consideration of a mobile banking system, to support female PAPs “who may encounter challenges in accessing cash.”⁶⁵
- Commitments under livelihood support programs include:⁶⁶
 - Work with HH to identify roles for all productive household members in agreement with the entire HH to identify HH at risk of GBV to refer to appropriate channels, such as local NGOs or local authorities.⁶⁷
 - Identify households at risk of GBV to refer to appropriate channels (such as local NGOs or local authorities).

⁶³ RAP 2, page 130.

⁶⁴ RAP 2, pages 126-127.

⁶⁵ RAP 2, Table 12.4, page 205.

⁶⁶ RAP 2, Table 12.4, pages 206-207.

- Detailed Project design to consider equitable programming for men and women to avoid men feeling left out in favour of women.⁶⁸
- Avoid projects and language that overtly appear to challenge the gender status quo.

4.6.2 Program Process

4.6.2.1 Gender analysis and Baseline Data Collection

Some of the variables in the baseline data for RAPs 2-5 were analysed and presented by gender, e.g., religion, household head, vulnerability, etc. In addition, gender roles within PAHs were defined.

4.6.2.2 Gender Awareness Training

The Project has made efforts to raise awareness about gender risks and considerations. According to Network Consult's "Progress on Gender Activities for the Tilenga Project" (September 20, 2024), the Project conducted gender awareness training for various stakeholders, as listed below⁶⁹:

- 62 Local Activists trained in the community
- 5 gender committees formed at the district level, including Terms of References
- 320 Information, Education and Communication (IEC) Materials Distributed
- 24 CTR Awareness Sessions conducted with (762 workers)
- 32 GBV case managed with 23 successfully closed
- 253 school learners were reached out in schools on GBV prevention and response awareness activities.
- 13 S/Cs Level Awareness
- awareness sessions in 58 villages across 5 Districts (3,6081 = 563 F &2,045M) beneficiaries).
- Child Protection Family Unit continuously engaged.
- Local Council Engagements.
- National level engagements support to 16 Delegation Of Authority (DOA) Campaign

Note that the above statistics do not indicate how many affected households were beneficiaries of the gender awareness training. Furthermore, though Network Consult monitors gender-related progress, their reporting does not specifically differentiate PAPs from other program participants / beneficiaries.

⁶⁸ See RAP 2, Table 12.4, 207, fn. 84, which explains, "[t]his does not mean each training has seats for 50 percent men and 50 percent women. Rather, if there is a special project / activity that targets women, then there must be an equitable project that targets men."

⁶⁹ Progress on Gender Activities for the Tilenga Project – 20th September 2024, Gender Management Program – Network Consult, Deliverables and Implementation Progress.

4.6.3 Key Findings and Recommendations

The findings below are based on field findings, document reviews and engagements with the Project team.

4.6.3.1 Key Findings

The Project has made significant progress in implementing and fulfilling the commitments listed in Section 4.6.1.

The Pilot Study Report on Promoting Women's Access, Participation, and Benefit from the Tilenga Project conducted by Networth Consult in Ngwendo Sub County (May 2024)⁷⁰ is a commendable effort to advance women's empowerment within the Project's local economy and society. The study details activities such as community engagement, formation and formalization (through registration with the DCDO) of Women's Economic Empowerment (WEP) groups, needs assessments, and capacity building initiatives in areas such as tailoring, catering, bakery, financial literacy, and addressing GBV. These initiatives are beneficial steps toward ensuring women can leverage Project-related opportunities and economic benefits. However, the report does not appear to have integrated a focused strategy for including PAPs in women's empowerment programs.

4.6.3.2 Assessment of Gender Mainstreaming Effort

The Company has established a comprehensive set of gender-related commitments through the Gender Management Plan (GMP) and the RAPs. These include gender-sensitive asset valuation, spousal consent requirements for compensation affecting household livelihood land, joint titling of replacement land, equitable access to compensation, and provision of legal and financial support to women and youth. The Consultant Team confirmed that these commitments align with RAP principles and demonstrate integration of gender considerations into land acquisition, resettlement, and livelihood restoration processes.

The Consultant Team found limited availability of data separated by gender (i.e., men vs. women) in project reporting. While the commitments are clearly stated, most documentation reviewed, including stakeholder engagement reports, livelihood restoration reports, and grievance and issue management documentation, did not consistently present information separated by gender. Similarly, contractor reports did not routinely provide data separated by gender related to livelihood training, business support, financial literacy activities, or other support services .

Field observations confirmed that the Project's gender-related commitments were formally embedded in core RAP procedures, such as compensation eligibility and land valuation. At the procedural level, mechanisms exist to help safeguard women's rights in compensation and land tenure, including the requirement for spousal consent and the use of joint land titling. These frameworks reflect good practice in gender-sensitive resettlement planning. As such, the Project's efforts are consistent with RAP and GMP commitments.

⁷⁰ Pilot Study Report on Promoting Women's Access, Participation, and Benefit from the Tilenga Project, Local Economy and Society (May 2024).

4.6.3.3 Recommendations

Align gender programming with the RAP closure process including ensuring RAP closure reporting shows results separated by gender.

4.7 Monitoring and Database

Monitoring and evaluation provide the basis for tracking program implementation, documenting adherence to RAP commitments, and assessing progress toward RAP closure. The Project has developed database systems, reporting mechanisms, and household-level verification tools, including the KYP approach. These increasingly allow for integration of compensation, livelihood, and household data to support closure readiness. This section examines the effectiveness of the monitoring framework and its application in assessing outcomes against RAP commitments.

4.7.1 Program Commitments

Chapter 15 of the RAPs 2-5 outlines the requirements for both internal and external monitoring.⁷¹ The commitments established in the RAP documentation are standard and, for internal monitoring, generally include procedures for internal capture of the effectiveness of RAP project management, tracking of impacted PAPs, including assessment of changes to household status, implementation of stated policies, and commitments and evaluation of conditions in displacement communities. External monitoring includes the use of an independent assessment of the effectiveness of RAP implementation as well as a Completion Audit to assess the tracking of livelihood restoration activities against the RAP.

RAPs 2-5 also set out a reporting schedule based on monthly, quarterly and annual assessments.⁷² Notably, RAPs 2-5 set out a requirement of Project staff to liaise with RAP2-5 resettlement committee on reporting non-compliance.

4.7.2 Program Process

Project staff reported that quarterly resettlement committee meetings (i.e., RPC and DIRCO) served as key touchpoints for bringing PAPs and resettlement stakeholders up to date on the Project process. Livelihood and transitional support subcontractors provided monthly and annual reports on contract implementation. The Project has set up a Borealis-based database. Prior to the Borealis system, data was managed through the resettlement contractors. Records such as compensation agreements, survey forms, livelihood restoration, and other key documents are stored in the Borealis database. The Project has a database manager that is responsible for oversight and data management within the Borealis system.

As Project implementation advanced, monitoring practices evolved beyond document management and reporting to incorporate structured verification of household-level livelihood restoration status. The introduction and application of the KYP tool consolidates multiple data sources, including the 2019

⁷¹ See RAP 2, pages 264-277.

⁷² RAP 2, page 265.

Baseline Survey, the 2021 LiME Survey, and livelihood program records, and applies them to verify household-level progress against livelihood restoration commitments. The process also enables identification of data gaps, confirmation of livelihood support received, and classification of households into three livelihood performance profiles that reflect readiness for transition and closure (Profiles 1–3).

This profiling system now provides a quantifiable method for assessing whether households are sustaining or improving upon their pre-Project livelihoods. It also enables identification of those requiring further verification, targeted assistance, or monitoring. Importantly, the KYP tool links monitoring directly to closure planning by providing a structured means to validate livelihood outcomes, document support, and identify remaining obligations at the household level.

4.7.3 Key Findings and Recommendations

4.7.3.1 Key Findings

The database manager and team can respond to data queries utilizing various data sources. Information by PAPs and PAP ID is accessible through the Borealis system, although many of the datasets are not yet queryable as information can be static (i.e., PDF documents) as opposed to unique fields of the database. Regardless, the information can be accessed with sufficient time allowance built into requests. Additional reporting by subcontractors is generally provided to the Project in a combination of excel data sheets and reports. Standardization is not yet applied in this system, and contractors tend to provide data based on their activities – as opposed to RAP integrated monitoring and reporting requirements. This is not a significant shortcoming, and the Project is able to overcome data and reporting inconsistencies within the data management team.

RAP monitoring reports, however, are not yet integrated according to RAP reporting requirements. Reporting is siloed based on departmental focus and stitched together for update requests. Standardization of RAP data reporting will contribute to better communication and understanding of RAP progress. The current focus should be on closure readiness and alignment of data and reporting to enable access and understanding of Project staff and closure audit team. This can be done through the closure-readiness phase in terms of building successive quarterly monitoring reports that communicate on standard data sets.

Other data observations include:

- Most reviewed reports (including RAP reports, stakeholder engagement reports, livelihood restoration reports, and grievance management reports) do not consistently present information separately by gender. Limited gender-specific information appears in the annual Reports on Provision of Agricultural Support Services (2022 and 2023).⁷³
- Reports by subcontractors generally do not show information separated by gender. Key data sets such as PAP employment or participation in service delivery required time to collect and it is difficult to assess progress or lack thereof in local participation. By compiling the data in

⁷³ For example, the 2023 report lists the number of female and male-headed households that received training in livestock management practices. See Provision Of Agricultural Support Services Under Tilenga Raps 2-5 In Buliisa, Kikuube And Hoima Districts Annual Progress Activity Report April 2023 – March 2024, Year 2, page 39.

regular quarterly reports, progress (such as, for example, the number of PAPs who are employed compared to the previous reporting period) can be tracked over time.

The KYP livelihood profiling system now provides a quantifiable method for assessing whether households are sustaining or improving upon their pre-project livelihoods. It also enables identification of those requiring further verification, targeted assistance, or monitoring. Importantly, the KYP tool links monitoring directly to closure planning by providing a structured means to validate livelihood outcomes, document support, and identify remaining obligations at the household level.

Taken together, the Project has established the foundational components of an M&E system and has progressively strengthened it through the integration of household-level data analysis and profiling tools. Continued efforts to align contractor data, improve reporting consistency, and apply the KYP tool within closure planning will further support compliance with RAP monitoring requirements and enhance transparency during RAP closure audits.

4.7.3.2 Assessment of Monitoring Effort

The Project has established the core elements of a monitoring and evaluation (M&E) framework that complies with the commitments set out in Chapter 15 of RAPs 2–5. The Consultant Team confirmed that the data management structure is in place, with a centralized Borealis system that allows household-level information to be accessed using PAP identifiers. While some information remains stored as static files (such as PDF documents) rather than in searchable database fields, the data can still be retrieved with sufficient time and effort, and the Project has demonstrated an ability to respond to reporting requests using available records.

Reporting inputs from livelihood and transitional support subcontractors are available in a combination of Excel sheets and narrative reports. Although these are not yet standardized across contractors or fully aligned with RAP monitoring requirements, the Consultant Team observed that the Project team is able to reconcile and interpret the data as needed. The current reporting structure remains somewhat siloed by departmental function, and consolidated RAP-level monitoring reports are not yet fully integrated. However, these gaps have not prevented the Project from demonstrating overall progress, and further standardization during closure-readiness stages would help strengthen audit preparedness and external reporting.

A significant advancement in monitoring and evaluation has been the development and application of the KYP tool, which provides a structured, household-level method for tracking livelihood progress. The KYP process consolidates data from socio-economic baselines, LiME surveys, and livelihood program records, enabling household verification, identification of data gaps, and assessment of whether households have progressed toward restoration or improvement of livelihoods. The household profiling system (Profiles 1–3) now provides a quantifiable foundation for monitoring livelihood restoration outcomes and for identifying households that may require further follow-up before closure.

Through field validation, cross-checking with existing RAP and livelihood records, and the closure of incomplete or inconsistent data fields, the KYP tool enhances the Project's ability to assess livelihood performance, document delivery of support inputs, and demonstrate progress toward closure

readiness. This represents a strengthening of the M&E framework, particularly as it relates to livelihood restoration monitoring and household-level verification.

Overall, the Project has established the key structural elements of an M&E system and is increasingly applying household-level monitoring tools that align with RAP closure requirements. Continued focus on integrating data sources, standardizing reporting formats, and aligning monitoring outputs with closure documentation requirements will further support audit readiness and compliance with RAP commitments.

4.7.3.3 Recommendations

1. Complete Q1/Q2 2026 Monitoring of Livelihood activities:
 - a. Confirm stabilization of livelihood activities through RAPs 2-5 programming.
 - b. Assess range of livelihood strategies against RAPs 2-5 baseline.
 - c. Identify range of entrepreneurial activity and assess support alignment within ADP and Community Integrated Development Initiative (CIDI) programming.
 - d. Update KYP Profile for Closure Interview.

5 RAP AUDIT AND CLOSURE PLAN.

Based on the PAP interviews, review of Project documentation and datasets and interviews with Project staff and other stakeholders, the Consultant Team recommends that the Tilenga Social Department initiate a RAP closure process involving completion of all RAP activities and auditing completed activities, as described in the RAP Closure Plan below:

Item/Activity	Description	Activity
1. Purpose and Objectives	The purpose of the RAP Closure Plan is to formally complete and document the implementation of the Resettlement Action Plan (RAP 2-5) for the Tilenga Project, ensuring that all obligations have been fulfilled and that affected persons (PAPs) have been adequately compensated, assisted, and supported in restoring their livelihoods	<ul style="list-style-type: none"> • Verification of completion of all RAP commitments outlined in the RAP, Entitlement Matrix and Individual Compensation Agreements through Closure Audit. • Assessment of the effectiveness of compensation and livelihoods restoration through Closure Audit. • Documentation and sharing lessons learnt.
2. Scope of the RAP Audit and Closure Plan	Compensation Payments	<ul style="list-style-type: none"> • Confirm all compensation payments have been made and acknowledged by PAPs.
	Resettlement Housing	<ul style="list-style-type: none"> • Analysis RAP data and confirm in-kind replacement compensation.
	Livelihoods Restoration and Transitional Support	<ul style="list-style-type: none"> • LRP End Line Survey and Report Q1 2025 – Living Earth Uganda. • Post LRP survey Q2 2026 (Mission 5)
	Grievance Redress Mechanism and Management.	<ul style="list-style-type: none"> • Updated Grievances and Concerns Tracker • Closure of concerns and grievances is on-going.
	Stakeholder Engagement and information disclosure	<ul style="list-style-type: none"> • Specific Project closure information sessions to various stakeholders including District Officials, PRC and DIRCO, Local Leaders.

Item/Activity	Description	Activity
		<ul style="list-style-type: none"> Individual household PAH/PAP Exit Interviews – Q4 2026.
3. Institutional Responsibility	TEPU - Management	<ul style="list-style-type: none"> Lead coordination of closure activities Q1 – Q4 2026
	TEPU – Field Team	<ul style="list-style-type: none"> CLOs to conduct RAP Exit interviews with individual PAPs using KYP Profiles as a guide to introduce transition opportunities in the ADP and CDI Q4 2026 Exit interview based on updated KYP Profiles will include (but not be limited to) <ul style="list-style-type: none"> Information about RAP Closure Overview of Entitlements Issue Responses Access to Other Programming Access to Other Support Acknowledgement of Interview Resolve all outstanding grievances and address concerns. Record outstanding cases
	Third-Party Monitor	<ul style="list-style-type: none"> Audit financial documents and draft Final Audit Report Q1 2026 <ul style="list-style-type: none"> Compensation: Confirm all PAPs received full compensation and entitlements Signed compensation agreements LRP: Assess restoration of income sources, training completion Q2 2026 RAP: Validate RAP compliance and social outcomes Q4 2026

Item/Activity	Description	Activity
4. Performance Indicators	Compensation Payment	<ul style="list-style-type: none"> • 100% of PAPs compensated before closure
	Livelihoods Restoration	<ul style="list-style-type: none"> • 80% of PAPs meet or exceed pre-project income levels separated by gender
	Grievances Redress Management	<ul style="list-style-type: none"> • All registered grievances closed or documented
	Stakeholder Engagement	<ul style="list-style-type: none"> • All affected communities consulted in closure process • Women consulted in closure process
	Compliance	<ul style="list-style-type: none"> • External audit confirms full compliance with IFC PS5 objectives
5. RAP Closure Report	<p>The following documents to compiled as part of the RAP Closure Report.</p> <p>All documentation should be archived both digitally and in hard copy for a minimum of 10 years.</p>	<ul style="list-style-type: none"> • RAP Implementation Closure Report (summary of all activities) • Final Compensation Database • Grievance Register (with closure status) • Livelihood Restoration Completion Report • Completion Audit Report • Stakeholder Consultation Records

6 SUMMARY OF RECOMMENDATIONS

Table 6 lists the recommendations appearing in the previous sections of this Report, indexed to the respective sections of the Report.

Table 66: Summary of Recommendations

Recommendation	Reference to Report Section	Comments
Livelihood Restoration	4.2	
1. Monitor PAHs in Q1 2026 to ensure completion of entitlements delivery and use of LRP training.	4.2.3.3	
Vulnerable Support Program	4.3	
1. Deliver vulnerable assistance measures to at least 20 PAHs, including, but not limited to livelihood training and inputs, transitional support, and measures tailored to specific household needs.	4.3.3.2	
2. Liaise with local government to support vulnerable PAHs' access to existing government services.		
3. CLOs to conduct vulnerable assessments of 7 PAHs identified in Consultant Team Mission 4 as potentially experiencing Project-induced vulnerability and, if		

Recommendation	Reference to Report Section	Comments
Project-induced vulnerability is found, deliver final mitigations / support.		
Concerns and Grievance Redress Mechanism and Management	4.4	
1. In addition to what is currently done for grievances, present an up-to-date Concerns Tracker as a standing agenda item at all DIRCO and RPC meetings to show outstanding concerns.	4.4.3.3	
2. Develop a set of FAQs and Key Messaging Bulletins to provide clear, consistent answers to recurring questions and concerns raised by PAPs, District officials, RPC and DIRCO members, and other stakeholders.		Development of clear, consistent answers to recurring questions and concerns raised by PAPs, district officials, RPC and DIRCO members, and other stakeholders, to be used by CLOs and district counterparts in daily interactions with PAPs will help to reduce repetition of concerns and questions, ensure transparency, and achieve resolution of grievances and concerns.
3. Record the status of all remaining concerns in the Project Concerns and Response Table.		This action will facilitate communication with PAPs and support the Project to act upon any active concerns that require escalation to grievances.
Engagement and Disclosure	4.5	
1. See Grievance Redress Mechanism and Management recommendation 2. above.	4.5.3.3	

Recommendation	Reference to Report Section	Comments
2. Prepare a focused engagement plan on RAP and Phase II Livelihoods Programming closure.		
Gender Considerations and Mainstreaming	4.6	
1. Align gender programming with RAP closure process, including ensuring that RAP closure data is recorded separately by gender in Project databases and reports.	4.6.3.3	
Monitoring and Database	4.7	
1. Complete Q1/Q2 2026 Monitoring of Livelihood activities, including:	4.7.3.3	
a. Confirm stabilization of livelihood activities through RAPs 2-5 programming.		
b. Assess range of livelihood strategies against RAPs 2-5 baseline.		
c. Identify range of entrepreneurial activity and assess support alignment within ADP and Community Integrated Development Initiative (CIDI) programming.		
d. Update KYP Profile for Closure Interview.		

Recommendation	Reference to Report Section	Comments
<p>e. Confirm stabilization of livelihood activities through RAPS 2-5 programming.</p>		

APPENDICES

Appendix A - Project Commitments Compared to IFC Performance Standards

Table A - 1: Project Commitments Compared to IFC Performance Standards (Reproduced from the LARF)

Resettlement Topic	IFC Performance Standard	Proposed Mitigation Measure
Alternative project designs	Feasible alternative Project designs should be considered to avoid or at least limit physical or economic displacement.	The JV Partners commit to avoiding or minimizing impacts by considering alternative project designs.
Planning Instruments	In the case of physical displacement, a Resettlement Action Plan will be developed. In the case of economic displacement only, a Livelihood Restoration Plan will be developed. Where both physical and economic displacement is caused, livelihood restoration will be incorporated in the Resettlement Action Plan.	The JV Partners commit to develop Resettlement Action Plans and Livelihood Restoration Plans once impacts of proposed land acquisition and resettlement activities have been identified.
Consultation and Information Disclosure	Resettlement activities must be planned and implemented with appropriate disclosure of information, consultation, and the informed participation of those affected including host communities in decision-making. The perspectives of women, minority groups and other categories with specific requirements must be obtained and their interests factored into resettlement planning and implementation.	The JV Partners commit to informing project affected persons (including host communities) and having them participate in resettlement planning. Furthermore, they commit to timely disclosure of information within affected communities.
Eligibility	Eligibility criteria should recognize the rights of those affected people: <ul style="list-style-type: none"> • Who have formal legal rights to the land or assets they occupy or use • Who do not have formal legal rights to land or assets, but have a claim to land that is recognized or recognizable under national law • Who have no recognizable legal right or claim to the land or assets they occupy or use 	The JV Partners will recognize the rights of all affected people including those with formal legal rights; those without formal legal rights and those who have no recognizable legal right to land or assets used or occupied by them. The census to be undertaken prior to land acquisition and resettlement activities will establish the status of the displaced persons

Resettlement Topic	IFC Performance Standard	Proposed Mitigation Measure
	The census will establish the status of the displaced persons.	
Cut-Off Date	In the absence of government procedures, the client will establish a cut-off date for eligibility which will be well documented and disseminated throughout the project area.	Cut off dates for eligibility will be well documented and disseminated throughout the project area, including relevant national ministries and local government.
Census	Where involuntary resettlement is unavoidable, a census will be carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance.	The JV Partners commit to identifying all persons who will be displaced because of their development activities. This will be done in the form of a census prior to resettlement to determine who will be eligible for compensation and assistance
Physical Displacement and Relocation	Physically displaced persons will be offered a choice of replacement property of equal or higher value, security of tenure, equivalent or better characteristics, and advantages of location or cash compensation where appropriate.	The JV Partners' policy is to provide physically displaced persons the right to choose from a number of resettlement options, and resettlement sites must offer improved living conditions. They must also provide suitable relocation assistance. No forced evictions (except those are in accordance with the law) are to be carried out.
Economic Displacement (loss of land)	Economically displaced persons will be compensated for the loss of economic assets at full replacement cost (PS5, §27) and with replacement land of at least the same productive potential and location advantage (PS5, §28).	The JV Partners will commit to compensating economically displaced persons: <ul style="list-style-type: none"> • with replacement land of at least the same productive potential and location advantage, or • for the loss of economic assets at full replacement cost.
Economic displacement (businesses)	Economically displaced persons will also be provided with (i) assistance to re-establish commercial activities (businesses), (ii) replacement property of equal or greater value, and will be provided with transitional support as necessary to restore their income-earning capacity and standards of living (PS5, §29).	The JV Partners are committed to the provision of support to commercially displaced persons, who will receive: <ul style="list-style-type: none"> • assistance to re-establish commercial activities; • replacement property of equal or greater value; and • transitional support to restore their income earning capacity and standards of living.
Full Replacement Cost	Mitigation measures to mitigate adverse impact should include compensation at full replacement cost for loss of assets and other assistance	The JV Partners commit to mitigating the adverse impacts associated with land acquisition and resettlement by compensating affected persons at full

Resettlement Topic	IFC Performance Standard	Proposed Mitigation Measure
	<p>to help them improve or restore their standards of living and livelihoods.</p> <p>Where livelihoods of displaced persons are land-based, or where land is collectively owned, affected persons will be offered land-based compensation where feasible.</p> <p>Land will be taken into possession only after compensation has been made available and resettlement sites and moving allowances have been provided to affected persons (PS5, §2, 9).</p>	<p>replacement cost of the affected assets.</p>
Form of Compensation	<p>Compensation in kind should be considered in preference over cash.</p>	<p>The JV Partners commit to compensating affected persons for loss of rights over land or property in kind in preference over cash.</p>
Vulnerable Groups	<p>In resettlement planning, particular attention should be given to the poor and vulnerable, and compensation in kind should be offered to facilitate permanent relocation and establishment at an alternative location.</p>	<p>The JV Partners commit to planning with particular focus to vulnerable project affected persons. Resettlement packages should give preference to compensation in kind with special facilitation of permanent relocation.</p>
Grievances	<p>Affected persons will have access to an independent grievance mechanism to lodge concerns and complaints about compensation and relocation without impeding access to any judicial or administrative remedies (PS5, §11).</p>	<p>The JV Partners commit to making an independent grievance mechanism accessible to project affected persons, including free access to judicial and administrative remedies.</p>
Monitoring and Evaluation	<p>A procedure to monitor and evaluate the implementation will be established; affected persons will be consulted during the monitoring process (PS5, §14).</p>	<p>The JV Partners commit to developing a Monitoring and Evaluation procedure that will assess the implementation of land acquisition and resettlement activities. Affected persons will be consulted during the M&E activities.</p>

Appendix B - Impacts Overview Tables

Table B - 1: RAPs 2-5 Displacement Summary (2021)

RAP #	Document Date	Components	Land Take (Acres)	# PAs	Land-owner	Land User	ED	PD	PD / ED	Vulnerable HH	Average PAP Landholding Acquired	# Residential Structures
RAP 2	Feb-21	Linear / WP	288	327	101	226	267	26	34	20	2.79	71
RAP 3a	Feb-21	Linear / WP	252	786	212	574	775	2	9	46	1.127	45
RAP 3b	Feb-21	Linear / WP	467	823	290	533	794	3	26	54	1.549	53
RAP 4	Feb-21	Linear	808	1,119	583	536	1,087	4	28	42	0.299	80
RAP 5	Feb-21	Linear	374	1,846	599	1247	1,803	12	31	113	0.366	N/A
Sub-total*			2,189⁷⁴	4,901	1,785	3,116	4,726	47	128	295		249
*Numbers are from 2021 RAP documents.												

⁷⁴ It should be noted that some the areas covered by the respective RAPs overlap with one another. For example, the footprint for a RAP 5 intersects with a portion of RAP 4.

Table B - 2: RAPs 2-5 Displacement Summary (2025)

RAP #	Document Date	Components	Land Take (acres)	# PAPs	Land-owner	Land User	ED	PD	PD / ED	Vulnerable HH
RAP 2	Sep-24	Linear / WP	288.4	346	102	225	285	61	346	20
RAP 3a	Sep-24	Linear / WP	242.2	785	212	574	769	16	785	51
RAP 3b	Sep-24	Linear / WP	452.4	827	290	533	795	32	827	60
RAP 4	Sep-24	Linear	767.3	1,139	583	536	1094	45	1139	45
RAP 5	Sep-24	Linear	365.1	1,857	626	1220	1806	51	1857	145
Sub-total*			2,115.4	4,954	1,813	3,088	4,749	205	4,954	321

Source: Tilenga Project Land Acquisition and Livelihood Restoration Overview and Current Status, RAP Implementation Independent Review (Land & People – Interface Uganda) presentation (September 12, 2024).

Notes:

1. Data in the “Landowner” column includes landowners who are also land users. The “Land User” column includes PAPs who use but do not own the land.
2. The average PAP Landholding Acquired for each RAP is still to be confirmed.
3. Data for Physically Displaced PAPs, Economically Displaced PAPs, Physically and Economically Displaced PAPs and Vulnerable Households are to be confirmed. Note the September 12, 2024 Presentation includes data for Physically Displaced Households and Vulnerable PAPs.

Table B - 3: RAPs 2-5 Impact Overview (2024)

RAP #	Overall Land Take (acres)	# PAP Received Crop Compensation	Cropped Land Acquired	Potential Grazing Area	Resource Area*	Cropland as % of RAP Land Take	Grazing Land as a % of RAP Land Take	# of Displaced Business	# Public Facilities	Public Access / Roads	# of Graves / Sacred Sites
RAP2	288.4	225	73.7	214.8	3.2	26%	74%	0	2	13	144
RAP3a	240.9	671	115.2	125.8	0.0	48%	52%	1	2	13	6
RAP3b	451.4	753	223.9	227.4	0.0	50%	50%	0	0	14	79
RAP4	767.3	1,011	188.0	579.3	45.9	25%	75%	1	7	37	81
RAP5	360.0	1,260	56.8	303.2	0.2	16%	84%	58	14	16	111
Subtotal	2,108.0	3,920	657.6	1450.5	49.4	31%	69%	60	25	93	421

* Primarily Lake Albertine Buffer Area

Appendix D - Project Documentation

1. Social Performance Organisational Chart
2. Land Acquisition and Resettlement Framework (LARF) (Dec 2016)

RAP Reports

3. Tilenga Project Resettlement Action Plan 1 - Industrial Area and N1 Access Road, including Executive Summary
4. Tilenga Project Resettlement Action Plans 2-5, including Executive Summary and Annexes

ESIA

5. Tilenga Project Environmental and Social Impact Assessment (ESIA), vols. I-V
6. Tilenga Project ESIA, vol. VIa, Appendices A-I
7. Tilenga Project ESIA, vol. VIb, Appendices J-T
8. Tilenga Project ESIA Non-Technical Summary

Community Concerns and Grievances

9. Community Concerns & Grievance Management Procedure Rev.: 3
10. RAPs 2-5 Implementation Community Concerns Log and Summary
11. Grievance Log (October 1, 2024)
12. RAPs 2-5 Implementation Grievance Tracker and Summary
13. Tilenga Project Grievance Statistics Presentation (Oct. 2024)
14. Stakeholder Engagement, Concerns And Grievance Management Quarterly Reports (Q1 & Q2 2024)

Social and Environmental

15. Tilenga Human Rights Report (2023)
16. Development of Lake Albert Fields, Block 1 (EA1/EA-1A) - Social Screening For Buliisa Project Facilities FINAL REPORT (Artelia Report) (2013)
17. Development of Lake Albert Fields, Block 1 (EA1/EA-1A) - Social Screening For Buliisa Project Facilities; Ngiri Field – Well Pads Screening (Artelia Report) versions 1 (2013) & 2 (2014)
18. TotalEnergies EP Uganda (TEPU) Social Report (2024)
19. TEPU Biodiversity Report (2024)

Surveys and Valuations

20. Valuation Workbooks (RAPs 2-5)
21. Approved Valuation Reports (RAPs 2-5)

22. Socio-economic Household Survey Form
23. Form B: Property/Asset Inventory Assessment Form
24. Selected PAP sample tracker
25. PAPs documentation and statistics
26. Worksheet showing PAPs Heads of Household by Gender, Impact Level, and Level of Support (RAPs 2-5)
27. Worksheet summarizing PAPs by Program Area (Livelihood Restoration, Community Health and Sanitation Services, and Gender Management), by Gender
28. Aggregated Households Database (Survey) (RAPs 2-5)

RAP Implementation and Monitoring - General

29. TELP Social Performance Contract SoW (Part 7 – Exhibit A) and Financial Conditions (Part 8 – Exhibit B)
30. RAP 2-5 Implementation Quarterly (Q2) Progress Monitoring Report (Sep. 2021)
31. Social & Resettlement Services For Contract Area 1 & Licensed Area 2 (North) Development Project (Tilenga Project) RAPs 2-5 Implementation Annual Progress Monitoring Report (Mar. 2021 – Mar 2022)
32. Social & Resettlement Services For Contract Area 1 & Licensed Area 2 (North) Development Project RAPs 2-5 Implementation Project Annual Progress Monitoring Report (Mar. 2022 – 02 Mar. 2023), including Annex 5 (Q1-Q3 Perception Studies) and Annex 6 (RAPs 2-5 Implementation Supplementary Socio-Economic Report)
33. Tilenga Project Land Acquisition and Livelihood Restoration Overview and Current Status, RAP Implementation Independent Review Presentation (Sep. 2024)
34. RAPs Implementation Third Party Review NGO Department Presentation (Sep. 2024)
35. TotalEnergies Social Department Tilenga Project Budget and Organisational Structure 2024
36. Excerpt from Third Party Valuation Report 2022

Livelihoods Restoration

37. Global Livelihood Restoration Plan(LRP) (RAPs 2-5) (Nov. 2020)
38. Global LRP – Household Severity Rating (RAPs 2-5 Implementation)
39. Provision Of Agricultural Support Services Under Tilenga (RAPs 2-5) – Annual Reports (2022 & 2023)
40. Transitional Support (Dry Rations) For RAPs 2-5 Tilenga Project Quarterly Monitoring Survey Report (Jul. 2022)
41. Transitional Support (Dry Rations) Services for Tilenga RAP2-5: Annual Monitoring and Evaluation Report (Nov. 2023)

42. Provision Of Agricultural Support Services Under Tilenga (RAPs 2-5) Project Progress Report Presentation (Mar. 2022 – Aug. 2024)
43. Transitional Support Project, PAPs in Tilenga Project Annual Progress Report For Dry Rations Under Tilenga (RAPs 2-5) (2023)
44. Provision Of Agricultural Support Services Project Under The Tilenga Project Raps 2 – 5: End Line Evaluation Report, Living Earth Uganda (March 2025)
45. ADP Phase III Background, Total Energies (2025)
46. Livelihood, Monitoring & Evaluation (LiME) Pre-Implementation Household Visit Livelihoods Indicator Checklist – Questionnaire (RAPs 2-5)
47. PAHs and Livelihood Options Worksheet (RAPs 2-5)
48. Financial and Business Capacity - Lists of Beneficiaries for Business Training, Vocational Training & Incubation (RAPs 2-5)
49. Transitional Support Project Tracker (RAPs 2-5)
50. List of Households with no SE data (RAPs 3-5)
51. Financial and Business Capacity Project (RAPs 2-5) Project Update Presentation (Sep. 2024)
52. Worksheet summarizing Beneficiaries Under Livelihood Restoration Programs (Farmer, Vocational Training, Mentorship, Business Incubation), by Gender
53. Livelihoods Indicator Checklist
54. Guide to Ranking HHs on the Four Level Pyramid
55. Livelihood, Monitoring & Evaluation (LiME) Program Terms of Reference
56. CAI Market Survey Report 2024, CIDI
57. Monitoring and Evaluation Report, Financial and Business Capacity (FBC) Project, Sunmaker (01 Apr 2025)
58. End of Project Activity Report, Sunmaker (25th June, 2025)
59. Market Linkages Report, Living Earth Uganda (June 2025)
60. Market Survey of Agricultural Commodities, Final Report, Living Earth Uganda, Esteem Internal Consultants

Stakeholder Engagement

61. RAP Implementation Supplemental Stakeholder Engagement Plan (SSEP) (RAPs 2-5) (April 2021)
62. Stakeholder Engagement Logs (RAPs 1-5) (2023 & 2024)
63. NGO Coordination Department List of NGOs
64. NGO Watch Newsletters (Mar. 2024 and Apr. 2024)

65. Quarterly Engagement Buliisa District Resettlement Planning Committee (DIRCO): Tilenga Project RAPS 2-5 Implementation, 29th March 2025

Resettlement and Relocation

66. Contract for Provision of Relocation Support Services Between TotalEnergies EP Uganda B.C. & Teltec Investments Ltd.
67. Amendment to Contract for Supply of Replacement Houses between TotalEnergies EP Uganda & Technical Masters Ltd.
68. Worksheets (x2) showing Distance Before and After Relocation by PAP (RAP 1 & RAPS 2-5)
69. Worksheet showing Primary Residents by Gender and Distance Before and After Relocation (RAPS 2-5)

Maps and Drawings

70. Strip Maps (RAPS 2-5)
71. Map of RAPS 1-5
72. District Maps Showing RAPS - Kikuube, Hoima, & Buliisa (2) Districts
73. Drawings of Resettlement Houses (x6)
74. Map showing RAP Primary Residences and Resettlement Houses (RAP 1)
75. Maps showing Locations of the Affected Houses and New Resettlement Sites (x2)
76. PAPS garden locations and Maps

Gender Management

77. Rapid Gender Capacity Needs Assessment On gender mainstreaming at individual, organizational and community level in Tilenga (Sep. 2022)
78. Gender Management Plan (v01 Apr. 2023)
79. Tilenga Gender Risk Management one pager
80. Provision Of Gender Management Services In The Tilenga Project Annual Report (2023)
81. Final Report On The Women Economic Empowerment (WEE) Focus Group Discussions Conducted In Ngwedo Sub-County, Buliisa District (Nov. 2023)
82. Gender Management Services Q1 Report (Jan. – Mar. 2024)
83. Cover letter for Gender Management Service – WEP Needs Assessment Report (Apr. 2024) submission to Petroleum Authority of Uganda
84. Pilot Study Report on Promoting Women’s Access, Participation, and Benefit from the Tilenga Project, Local Economy and Society (May 2024) and Report submission cover letter to Petroleum Authority of Uganda
- Gender Management Program Deliverables & Implementation Progress Report (Sep. 2024)

Appendix E - Summary of Livelihood Mitigation Entitlements

Table E - 1: Summary of Livelihood Mitigation Entitlements

	RAP / LRP	RAP	RAP	RAP	LRP
#	Type of Loss	Category of Affected	Entitlement	Eligibility	Livelihood Strategies
1	Permanent Loss of Agricultural Land / Crop Land	Registered Owners or claimants of customary held lands	<p>Option 1:</p> <ul style="list-style-type: none"> - Owner identifies and negotiates the purchase of replacement land at agreed value and within agreed area. The project buys the new land for the owner. - Provision of support registration cost and required formalities to ensure security of tenure. <p>OR</p> <p>Option 2:</p> <ul style="list-style-type: none"> - Cash compensation for land, at replacement cost - Statutory disturbance allowance of 30% of compensation amount. 	Persons must prove ownership (not necessarily through title) at the time of final asset surveys.	<p>For significantly/severely impacted HH / owner:</p> <ul style="list-style-type: none"> - encourage in-kind compensation over cash - encourage hh to procure similar land type and size - support hh to improve productivity of remaining livelihoods assets - impacted hh are paid to make new land productive <p>For significantly/severely impacted HH / user:</p> <ul style="list-style-type: none"> - Support HH to improve productivity of remaining livelihoods assets. - Support HH to identify other land to use. - If they choose to not identify new land: Support HH to improve productivity of remaining livelihoods assets or transition to alternative livelihood. <p>For mildly impacted HH / owner:</p> <ul style="list-style-type: none"> - Support HH to improve productivity of remaining livelihood assets <p>For mildly impacted HH / user:</p> <ul style="list-style-type: none"> - Provide agriculture options awareness training.
2	Permanent Loss of Grazing Land	<ul style="list-style-type: none"> - Registered Owners or claimants of customary held lands - Other users of grazing land 	<ul style="list-style-type: none"> - Cash compensation of the value of the land at replacement cost. - Statutory disturbance allowance of 30% 	For cash compensation, persons must prove ownership and interest (not necessarily through title)	<p>For significantly/severely impacted HH / owner:</p> <ul style="list-style-type: none"> - Encourage HH to accept in-kind compensation over cash. - Encourage HH to procure similar land type and size.

	RAP / LRP	RAP	RAP	RAP	LRP
		within the surrounding villages	of compensation amount. - Other users - Provision for Livelihood Restoration support.	at the time of final asset surveys.	<ul style="list-style-type: none"> - Support HH to improve productivity of remaining livelihoods assets. - Impacted HH are paid to make new land productive. <p>For significantly/severely impacted HH / user:</p> <ul style="list-style-type: none"> - Support HH to improve productivity of remaining livelihoods assets. - Support HH to identify other land to use. - If they choose to not identify new land: Support HH to improve productivity of remaining livelihoods assets or transition to alternative livelihood. <p>For mildly impacted HH / owner:</p> <ul style="list-style-type: none"> - Support HH to improve productivity of remaining livelihoods assets. <p>For mildly impacted HH / user:</p> <ul style="list-style-type: none"> - Provide agriculture options awareness training.
3	Annual Crops	Owners of crops on farmland	Where project gives at least 90 days' notice to farmers to harvest their annual crops: owner receives no compensation. Where insufficient notice period was given (less than 90 days)	<ul style="list-style-type: none"> - Crops in place (rooted) at CoD and identified through final surveys. - Compensation according to defined growth stage or size categories. - Crop owners identified through final asset surveys 	
4	Perennial Crops (Including fruit and	Owners of crops on farmland	Option 1. Cash compensation at replacement cost at agreed rates determined	<ul style="list-style-type: none"> - Crops or trees in place (rooted) at cut-off date and identified 	<p>For significantly/severely impacted HH / owner:</p> <p>Support HH to convert from tree crops to permitted crops of similar value.</p>

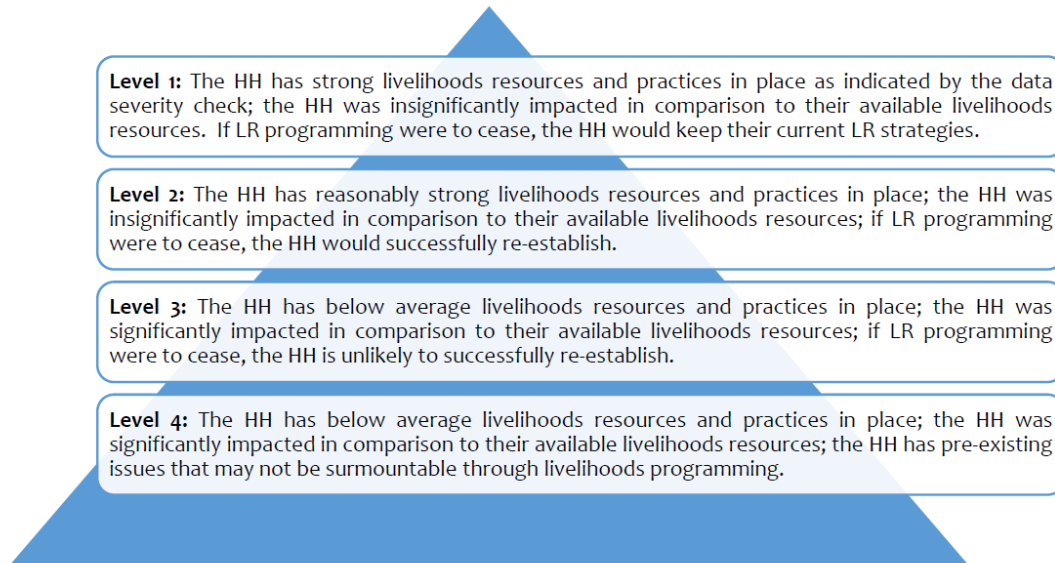
	RAP / LRP	RAP	RAP	RAP	LRP
	economic trees)		<p>annually by the District Land Board based on replacement cost determined by formal market studies.</p> <p>Statutory disturbance allowance of 30% of compensation amount.</p> <p>Access to Livelihood Restoration Program.</p> <p>OR</p> <p>Option 2. Where cash compensation is not preferred for fruit and economic tree, two (2) replacement saplings for every damaged tree of a crop variety suitable for the identified replacement farmland.</p> <p>NB: Only applicable to fruit and economic trees. No replacement fruit and economic tree saplings will be planted within infrastructure corridor with land-use restrictions.</p> <p>Access to Livelihood Restoration Program.</p>	<p>through final surveys.</p> <ul style="list-style-type: none"> - Compensation according to defined growth stage or size categories. - Crop and tree owners identified through final asset surveys. 	<ul style="list-style-type: none"> - If they choose not to convert crop type: Support HH to improve productivity of remaining livelihoods assets or transition to alternative livelihood. <p>For mildly impacted HH / owner:</p> <ul style="list-style-type: none"> - Provide agriculture options awareness training.
5	Restricted access to natural resource areas	Natural Resource Users within the surrounding villages	Project to address access restrictions through improved access to alternative natural	Persons from the surrounding villages who gather natural resources	

	RAP / LRP	RAP	RAP	RAP	LRP
			resource areas or substitute resource base. Participation in Livelihood Restoration Programs to restore livelihoods to pre-resettlement levels. This may include provisions to provide access to alternative resources (such as seedlings).	such as medicinal herbs/trees, thatching grass, timber or mushrooms.	
6	Loss of small businesses	<ul style="list-style-type: none"> - Business owners whose operations are temporarily restricted - Business owners who are physically and economically displaced - Business owners - Business owners and employees 	<p>Cash: Cash compensation for the temporary loss of income from non-farm businesses for the duration of the temporary restriction or business closure, based on financial records of individual businesses.</p> <p>The project will endeavour, where practical, to schedule its activities to minimize temporary business income losses.</p> <p>Cash – In case of a person who is physically and economically displaced on a permanent basis, cash compensation for the loss of income from non-farm businesses for a period of three months from the date when the Project takes</p>	<ul style="list-style-type: none"> - Business owners identified during final census and business surveys. Income and expenditure data obtained from final census and business surveys. In the absence of recorded financial information, aggregate information based on similar businesses will inform determination of monthly net income - Review of businesses that were physically displaced to assess progress of re-establishment before end of 	<p>Structure – Registered business</p> <ul style="list-style-type: none"> - Encourage HH to re-establish business. - If they re-establish: Improve business productivity and profitability (product, process, and administrative improvement). - If they don't re-establish: Support HH to improve productivity of remaining livelihoods assets or transition to alternative livelihood. <p>Structure – Unregistered established business</p> <ul style="list-style-type: none"> - Encourage HH to re-establish business. - If they re-establish: Improve business productivity and profitability (product, process, and administrative improvement). - If they don't re-establish: Support HH to improve productivity of remaining livelihoods assets or transition to alternative livelihood. <p>Structure – Unregistered new business</p>

	RAP / LRP	RAP	RAP	RAP	LRP
			<p>possession of the affected business structure</p> <p>In kind – Business advice to assist with re-establishment of displaced businesses.</p> <p>Cash/In kind – business owners with immovable structures will be provided with replacement structures (see Structure section below) or cash compensation</p> <p>In kind: Business owners’ assistance for business items, where practical, including loading, transportation and unloading assistance. OR</p> <p>Cash – Transportation allowance for self-arranged transportation of business items at an agreed all-inclusive rate per kilometre for transport hire and fuel.</p> <p>In kind – Participation in business improvement program to increase earning capacity. Details of program to be determined</p>	<p>three-month assistance.</p> <p>- Employees of affected business enterprises will be provided with separate cash compensation (see Business employee section below</p> <p>- Business owners identified through final census and business surveys</p> <p>- Business owners identified through final census and asset survey</p>	<p>- Provide general business skills training.</p>
7	Loss of preferential access to water or				- Encourage HH to procure similar land type and size with similar access to public facilities.

	RAP / LRP	RAP	RAP	RAP	LRP
	public facilities				- If alternate land with similar access is not available, consider additional support to maintain similar access to public facilities.
8	Structure – Well Borehole				- Re-establish water supply infrastructure.

Appendix F - Four-Level Pyramid Used to Rank Livelihood Restoration Needs



Appendix G - Summary of Livelihood Restoration and Vulnerable Support Program Impacts and Mitigations

Table G - 1: Summary of Livelihood Restoration and Vulnerable Support Program Impacts and Mitigations

Livelihood Impact / Type of Loss	No. of PAPs	Acres	Mitigation Delivered	No. of PAPs
Permanent Loss of Agricultural Land / Crop Lan	1,498 PAP (30% of PAP)	658	In-Kind Replacement Land	29 PAP / Farms
			PAP-Identified Replacement Land	3,503 PAH / Farms
Loss of Annual / Perennial Crops / Trees	2,433 PAP (40% of PAP)	-	Crop Improvement Services	3,503 PAH
			Tree Nursery Services	701 PAH
Permanent Loss of Grazing Land	365 PAP (7% of PAP)	1,451	Livestock Improvement Services	2,880 PAH
Loss of Small Businesses	60 PAP (1% of PAP)	-	Small Business Support	117 PAH
Restricted Access to Natural Resources	-	-	SMP	
Loss of Preferential Access to Water or Public Facilities	-	-	SMP	
Structure – Well Borehole	-	-	RAP	7/7 boreholes

Table G - 2: Agricultural Support Services (AGSS) Program Components

S/N	Deliverable	Brief of the deliverable scope
1	Stakeholder Engagement	Identification of key stakeholders to harmonize on their roles and responsibilities during project implementation. (All level, local, regional, national, and international)
2	Provision of Crop Improvement services	Trainings PAHs in good agricultural practices and providing crop inputs that are high yielding, tolerant to drought and resistant to pests and diseases.
3	Provision of Tree Nursery services	Training PAP HHs in good tree nursery practices and provision of seedlings for fruit, timber, medicinal and fuel wood trees aimed at curtailing escalating environmental degradation.
4	Provision of Livestock Improvement services	Training of PAHs in good animal husbandry practices (breeding & animal health care) and pasture agronomy. Provision of improved animal breeding stock (Boer Bucks, female goats & Boran Bulls) to cross breed with the locals with in communities. Provision of improved pasture varieties for increased access to grazing land.
5	HSE & PPE	Provision of full PPE materials to project staff. Conduct sensitization briefs to staff and communities on H3SE procedures. Prepare and submit weekly H3SE reports.
6	Monitoring and Evaluation	Project Monitoring, Evaluation, Accountability and Learning

Table G - 3: List of Post-Harvesting Handling Equipment Delivered Through AGSS Program

Equipment / Technology	Target ⁷⁵	Reported Achievement (as of March 2025) ⁷⁶
Silos	300	300
Tarpaulins	500	500
Drying racks	100	100
Cassava chippers	85	85
Maize shellers	15	15
Milling machine	1	1
Moisture metres	5	5

⁷⁵ Targets are identified in a December 9, 2024 progress report presentation prepared by Living Earth Uganda (file name “AGSSP Tilenga-Project progress report-12-09-2024 submit”) pages 17-18, which states “Cumulatively, 100 farmer Groups have been supported with post-harvest handling equipment.”

⁷⁶ Reported in March 28, 2025 DIRCO Presentation, page 25.

Appendix H - PAHs Livelihood Profiles

Excerpt from Mission 4 Report:

KYP Data Analysis Findings

Reassessing Profile 1 PAHs

The update of KYP data allowed the Consultant Team to refine the livelihood analysis of all Profile 1 PAHs. These households were re-assessed using the updated KYP tool and, where relevant, shifted to profiles 2 and 3 based on demonstrated livelihood improvements. The refined profile distribution now provides a more accurate representation of overall progress toward livelihood restoration.

Preliminary analysis of Mission 4 KYP data indicated positive trends compared to Mission 3. The updated “livelihood curve” (Figure H - 1) demonstrated a reduction in the proportion of Profile 1 households and an upward shift toward profiles 2 (“Maintaining”) and 3 (“Doing Well / Excelling”).

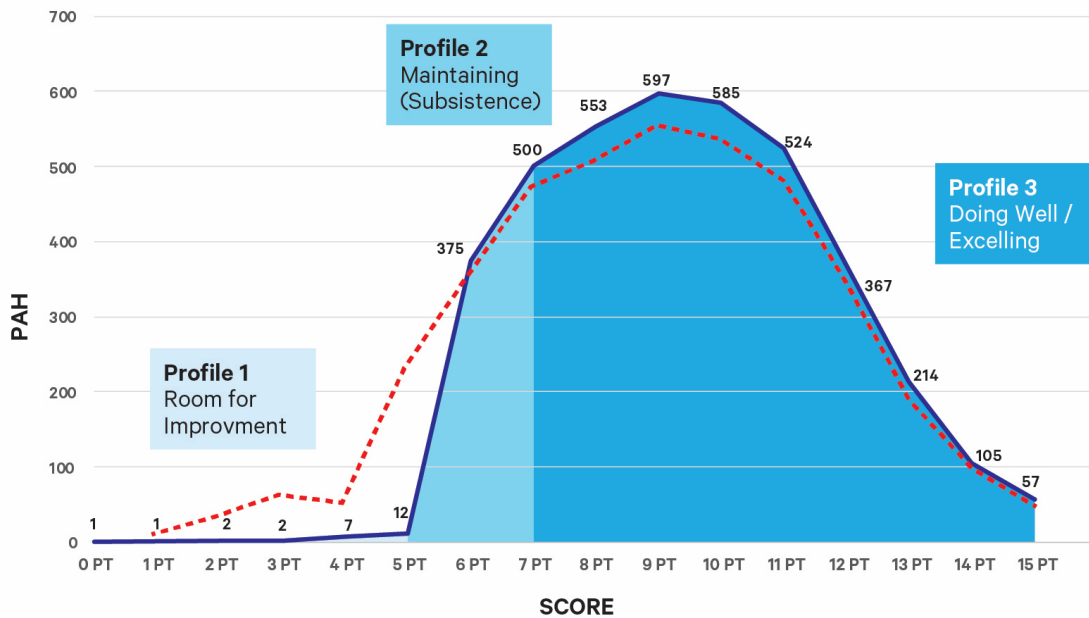


Figure H - 1: Comparison of Profile 1 Curve (Mission 3 v. Mission 4 Analysis). The dashed red line represents the original curve based on the Mission 3 analysis. The solid blue line containing the shaded areas represents the new curve, updated to reflect the re-assessment undertaken in Mission 4.

Table H - 1 shows the number of PAHs occupying each profile following the re-assignment of more than 300 PAHs from Profile 1 to profiles 2 and 3.

Table H - 1: Number of PAH Per Profile

CATEGORY	# of PAHs Per Profile	% of PAHs
	M04	M04
Profile 1	24	0.6%
Profile 2	875	22.1%
Profile 3	3002	75.8%
Not interviewed	55	1.4%
Duplicates	4	0.1%
TOTAL	3960⁷⁷	100%

As described in the Consultant Team's Mission 3 Report, the Consultant Team selected the following livelihood indicators to incorporate into the KYP assessment:

1. Total land Acreage Owned by PAH
2. Status of Land Ownership
3. Reported Land Productivity
4. Land Productivity
5. Livestock Productivity
6. Business / Employment Income
7. PAH was involved in IGA in 2021
8. PAH utilized LEU LRP training
9. PAH belongs to farmer organization
10. Food security status

PAHs' livelihood performances as measured against each indicator are shown in tables H – 2 to H - 11:

Table H - 2: Relative Improvement in Total Land Acreage Owned by PAH

Total Land Acreage Owned by PAHs	# of PAH
Decreased	948
Remained the same	1613
Increased	1212
NA	6
No Data	122

⁷⁷ KYP analysis households (n=3,960) include those households that have a complete set of data between baseline, LiMe and endline survey and may differ from Project-identified households.

land+people

Duplicates	4
Not interviewed	55
Total	3960

Table H - 3: Relative Improvement in Status of Land Ownership

Status of Land Ownership	# of PAH
Declined	321
Improved	2509
Remained the same	961
NA	1
No Data	109
Not interviewed	55
Duplicates	4
Total	3960

Table H - 4: Number of PAH Who Reported Land Productivity

Reported Land Productivity	# of PAH
No/ No Data	1152
Yes	2749
Not interviewed	55
Duplicates	4
Total	3960

Table H - 5: Land Productivity Performance Against LEU Targets

Land Productivity	# of PAH
Below target	1069
Close/ equal to target	183
Above target	839
No Data	1772
NA	38
Not interviewed	55
Duplicates	4
Total	3960

Table H - 6: Relative Improvement in Livestock Productivity

Livestock Productivity	# of PAH
Decreased	245
Remained the same	188
Increased	2142
No Data	1326
Not interviewed	55
Duplicates	4
Total	3960

Table H - 7: Relative Improvement in Business / Employment Income

Business / Employment Income	# of PAH
Decreased	459
Remained the same	1740
Increased	1651
NA	15
No Data	36
Not interviewed	55
Duplicate	4
Total	3960

Table H - 8: Number of PAH Involved in Income Generation Activities in 2021

PAH Was Involved in IGA in 2021	# of PAH
No/No Data	871
Yes	3030
Not interviewed	55
Duplicates	4
Total	3960

Table H - 9: Number of PAH Who Utilized LRP Training

PAH Utilized LRP training	# of PAH
No/ No Data	790
Yes	2636
Not interviewed	55
Duplicates	4
Total	3485

Table H - 10: Number of PAH Who Belong to Farmer Organizations

PAH Belongs to Farmer Organization	# of PAH
No/ No Data	548
Yes	3353
Not interviewed	55
Duplicates	4
Total	3960

Table H - 11: Number of PAH Who Are Food Secure

Food Security	# of PAH
No/ No Data	304
Yes	3597
Not interviewed	55
Duplicates	4
Total	3960