



22 March 2019

Dr R Woodruff MP
1 Salamanca Place
Parliament House
Hobart, Tasmania 7000

Dear Dr Woodruff,

I refer to previous discussions, and exchanges of correspondence, between Mr Greer of your office and myself in connection with your two RTI's from last December.

I confirm that in relation to your requests it was agreed, thank you, that you did not require information relating to the technical aspects of the project, and that the information could be limited to those word groups referred to in Mr Greer's email dated 31 January 2019 (the refined scope).

In accordance with that refined scope I now enclose the information referable to those word groups.

Yours sincerely,

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COUNTRY RISK AND SECURITY REPORT

27-04-2017



Uganda

High Risk

SUMMARY

Uganda is considered a **HIGH** risk travel destination. Countries classified as High Risk experience regular conflict or criminal activity and civil unrest. These countries are insecure, their state apparatus is weak and security services are unable to effectively manage crises.

Political Stability: In February 2016, President Yoweri Museveni won a fifth term with 60 percent of Uganda's third multi-party elections since the country won its independence in 1962. The Ugandan political system is relatively stable, but is still under threat from authoritarianism and armed anti-government groups;

Conflict and Terrorism: Al-Shebaab has threatened to attack targets within Uganda. The LRA and Allied Democratic Forces (ADF) have been reduced in their capability to carry out attacks, but remain committed in their fight against the Ugandan government. Other armed groups are active along border areas across Uganda.

Corruption: Low level corruption is endemic in most parts of Uganda, particularly **Kampala** and **Entebbe**. Foreign nationals are often targeted at airports and government offices for bribes.

Health Risks: Medical facilities are basic in **Kampala** but considerably worse elsewhere. Water in Uganda is not potable. Yellow fever is endemic and Malaria is prevalent throughout Uganda, including in urban areas;

Personal Safety: Although extensive measures have been undertaken by the Ugandan government and the United Nation Development Programme (UNDP) to demine and destroy landmines and other explosive ordinances, it is believed that the districts of **Gulu** and **Amuru**, as well as other regions within northern Uganda, are still riddled with explosive devices placed by members of the Lord's Resistance Army.

DYNAMIQ RISK & TRAVEL INFORMATION

High risk description

Countries classified as HIGH risk experience regular political or criminal activity and civil unrest. These countries on the whole are insecure and the authorities are unable to effectively prevent or respond to emergency situations. If you have received this travel advisory you:

Travellers are reminded to utilise the "P.A.C.E. yourself before you go" methodology. P - Plan & Pack: Have a plan, be informed of location specific risks, and prepare accordingly.

A - Assistance & Accountability: Have an allocated support person that knows your plans and welfare check-in times. C - Communication & Contingencies: Have at least two (2) forms of communications (local and international roaming sim), and consider emergency beacons for remote locations.

E - Emergency & Exits: Have an emergency contact list (including local emergency services), and when in doubt know your way out. Please consult senior management and/or Dynamiq with any questions prior to travel. To schedule a web-based travel safety and security brief, delivered by Dynamiq's travel security experts, please contact ops@dynamiq.com.au. To schedule a PSAT and/or HEAT courses, delivered by Dynamiq's International security and high risk operations experts, please contact training@dynamiq.com.au.

Non Emergency Contacts

For routine calls please contact Dynamiq head office:
Call: +61 2 9154 2600

Emergency Contacts

Dynamiq 24/7 Emergency Operations Centre

Emergency PROACT line: +61 2 9119 6333

Emergency Email: 24.7@dynamiq.com.au or help@dynamiqassist.com

Emergency SMS: +61 416 907 493

For routine calls please contact Dynamiq head office:

Call: +61 2 9154 2600

LATEST ALERTS

19-04-2017 - Local traders protest against foreign businesses in Kampala

Hundreds of local traders rallied in downtown Kampala, triggering the closure of shops along Nakasero, Sikh Street, Market square and Dastur Street, in a protest against perceived unfair advantages received by Chinese and Indian businesses in the city. The protest was reportedly peaceful.

Advice: Anticipate heightened security and associated disruptions in downtown Kampala over the next several hours. Plot alternative bypass routes to avoid the protest area; allow for additional travel time

19-04-2017 - Unidentified gunmen raid police station in Kween district

At least one police officer and one assailant were killed and several other people arrested after a crowd of over 30 unidentified gunmen stormed the Ngenge police post in Kween district, during evening hours local time on 18 April. The motive behind the attack was not immediately clear; police did not immediately disclose whether any weapons were stolen from the police post during the attack.

Advice: Anticipate elevated security measures across Ngenge. Exercise caution when undertaking rural travel in Uganda; remain vigilant

06-04-2017 - Police clash with opposition supporters in Katakwi district, Eastern region

At least two people were injured as police reportedly fired tear gas and live ammunition to disperse a crowd that had gathered to receive unauthorised famine relief aid from Forum for Democratic Change (FDC) opposition activists in Toroma county, Katakwi district, Eastern region, on 5 April.

Advice: Further clashes over the issue are possible in the Eastern region in the near-term. Anticipate heightened security at public events and possible unrest in the event police prevent or disperse opposition gatherings

02-04-2017 - Gang members raid homes in Masaka, Central region

At least six people were injured after a gang of machete-wielding attackers raided several homes in Masaka town, Central region, in recent days. The assailants reportedly distributed warning fliers in the area ahead of the attacks. Police arrested two suspects linked to the group; security was heightened in the area.

Advice: Anticipate elevated security measures across Masaka. Exercise caution when undertaking rural travel in Uganda. Notify your home country embassy and/or local authorities prior to departure

26-03-2017 - Police clash with opposition supporters in Ngora, Eastern region

Local media reported that Ngora district police set up roadblocks and used tear gas to disperse dozens of people attending a Forum for Democratic Change opposition rally at the Koloin trading centre in Ngora, Eastern region, on 25 March. There were no immediate reports of arrests or injuries.

Advice: Anticipate heightened security at rally sites and possible unrest in the event police prevent or disperse opposition gatherings; avoid all political protests on an ongoing basis

25-03-2017 - Gunmen attack South Sudanese official in Moyo district

Two gunmen, believed to be South Sudanese nationals, opened fire on a restaurant in Moyo, Moyo district, in an attempt to kill a South Sudanese official, on 22 March. No injuries were reported in the wake of the attack; the gunmen reportedly fled after being disarmed at the scene.

Advice: While the incident is unlikely to affect foreign nationals, travellers are nonetheless advised to remain vigilant at all times, particular in rural areas. Report all suspicious objects/behaviour to local authorities

ADVISORIES

Border regions with South Sudan and Kenya

Travellers are advised to defer non-essential travel to regions bordering South Sudan and northwest Kenya, including the **Karamoja region**.

There is a risk of banditry and crime in northern border areas; while de-mining operations are ongoing in this region, landmines remain a danger. Dozens of local villagers were kidnapped in the **Northern Region's Yumbe district** in May 2016 by suspected rebels who crossed over the border from South Sudan. A similar incident took place in the region's **Lamwo district** in July 2016, when renegade Sudan People's Liberation Army (SPLA) soldiers kidnapped six people. The kidnapping came despite the deployment of additional soldiers to the border region earlier in July to prevent a spillover of violence from South Sudan. In October, authorities on both sides of the border deployed a joint police force in an attempt to stem attacks on vehicles travelling between Juba, South Sudan, and **Kampala**.

Clashes between tribes in the northeast **Karamoja region** can take place with little or no warning. The conflict stems from the Karamojong pastoralists' possession of small arms, which are frequently used to solve disputes. The Karamojong do not recognise the authority of the Ugandan state and UPDF operations to disarm the group since 2002 have been met with severe resistance in the past. In March 2016, a UPDF spokesman warned of a possible rearmament of Turkana and Karimojong pastoralists in the region.

For purposes of essential travel, register itineraries with consular services and contract a local, embassy-vetted travel guide. Visitors to **Kidepo National Park** are advised to fly there rather than attempt overland travel.

Border regions with the Democratic Republic of Congo

Travellers are advised to exercise a high degree of caution for travel to regions bordering the Democratic Republic of Congo (DRC).

Members of the Rwenzururu kingdom, which has a history of secessionist and anti-government sentiment, have engaged in armed confrontations with Ugandan security forces on several occasions in **Western Region**. The latest took place in November 2016, when the government accused the kingdom of preparing to break away from the country and training fighters in camps in the region. Security forces raided several of these camps, sparking exchanges of fire with royal guards that left dozens dead on both sides. Much of the fighting was centred around **Kasese**, the seat of the kingdom, where King Charles Wesley Mumbere was eventually arrested. A similar bout of violence erupted between February and March 2016 in which 50 people were killed.

For purposes of essential travel, register itineraries with consular services and contract a local, embassy-vetted travel guide. Visitors with business interests, notably in the extractive industry, in the oil-rich region are advised to maintain updated contingency plans, including for temporary evacuation.

Context: Members of the Bakonzo ethnic group declared their own Rwenzururu kingdom in 1962. Years of violence between the kingdom and the government ended in 1982 after a ceasefire in which the Rwenzururu agreed to cease hostilities in exchange for some local autonomy. The kingdom was officially recognised by President Yoweri Museveni in 2009, however tensions between the two sides persisted.

Special Reports

COUNTRY REPORT

Political Overview

Political Overview

Uganda has a **Medium Risk** of political instability. The country's democratic parliamentary system is fronted by an elected president who maintains a pseudo-authoritarian grip on power.

President Yoweri Museveni has governed Uganda since 1986 when his National Resistance Army (NRA) ousted the regime of Tito Okello. Constitutional amendments passed in 2005 introduced a multi-party electoral system, while abolishing limits to presidential terms in time for 2006 elections that saw Museveni returned to power for a third term. The president's National Resistance Movement (NRM) also continues to control a majority in parliament. His main challenger in the 2006, 2011 and 2016 elections was Kizza Besigye of the Forum for Democratic Change (FDC). These elections have been accompanied by a crackdown on the opposition – including frequent arrests of Besigye and forceful disruption of FDC rallies – as well as intimidation and censorship of the press.

Uganda is as a socially diverse country with much tension, but political conflict is predominantly characterised by regional tensions particularly between the rural and agrarian north, and the industrialised and urbanised south. In the north east of Uganda in Acholiland, the rebel Lord's Resistance Army (LRA) has waged an insurgency since 1986. There are also a number of other smaller armed opposition groups in Uganda, such as the Karamajong and the Allied Democratic Forces (ADF). Uganda has a history of involvement in regional conflict and relations with Southern Sudan, the DRC, and Rwanda remain tense.

The Ugandan government has continually said that it will only pursue the revoking of the warrants once the LRA sign the peace agreement. Until a peace deal is signed, and the LRA are demobilised and integrated into Ugandan society, insecurity in northern Uganda will remain and provide a source of political instability.

Conflict, Terrorism & Unrest

Conflict

Overview

Uganda currently has a **Medium Risk** rating for conflict. While Uganda is not at war with any foreign party at this time, there are several active militant groups in the country.

Allied Democratic Forces (ADF): Formerly active in the southwest **Kibaale, Hoima, Kyenjojo, Kaborole** and **Mubende districts**, the ADF is now largely based in North Kivu province of neighbouring Democratic Republic of Congo (DRC). The group's goal, however, remains the overthrow of the Ugandan government and the establishment of an Islamic state. Major attacks by the group in eastern DRC, such as in December 2015, have prompted the Uganda People's Defence Force (UPDF) in the southwest to go on high alert. While no successful attacks have taken place in recent years, ADF attacks remain possible, especially near the border with DRC.

Lord's Resistance Army (LRA): Active in **northern and eastern Uganda**, the rebel Lord's Resistance Army (LRA) began systematically abducting and killing civilians in 1986. In late 2008 the Ugandan government launched Operation Lightning Thunder, a hunt for LRA units that forced fighters to scatter in small groups operating in Sudan, Congo, and Central African Republic. Scattered elements of the group retain the ability to attack areas of northern Uganda and neighbouring countries.

Uganda Saving Force (USF): Emerging in early 2016, the USF is an anti-government group that claims to operate in the eastern **Mt Elgon** region near the border with Kenya. Security sources in the Ugandan government have dismissed the group as "thugs", however further attacks are possible in the **Kapchorwa** and **Kween** districts of **Eastern Province**.

Border Conflicts: The Ugandan and Rwandan regimes are part of a historic rivalry, which has eased, but nonetheless remains subject to periodic and unpredictable fluctuations. The two countries first fought over access to resources in the eastern DRC, while Rwanda accused Uganda of sheltering opponents to its regime.

Independent Tribes: In July 2014, suspected Obusinga bwa Rwenzururu tribal members, armed with guns and machetes, attacked three police stations in **Kasese**, **Ntoroko** and **Bundibugyo** districts in the western border area with the DRC. The attacks, the worst incidents of violence since the 1990s, were clearly coordinated, however they did not constitute a full resumption of a rebellion in these areas.

Tensions, however, came to a head between the Rwenzururu tribe and the central government in November 2016, when security forces attempted to arrest armed guards of the traditional king of the Bakonzo in **Kasese**. Clashes escalated in the western border area over several days, leaving an estimated 85 people dead. In the aftermath of the violence, more around 150 people were arrested, including King Charles Wesley Mumbere.

Kampala maintains uneasy relations with independent tribes across Uganda, vacillating between allowing greater autonomy for tribal kingdoms and cracking down on leaders who attempt to assert too much local authority. Similar violence by tribal elements remains possible.

Militias: **Eastern Uganda** has historically witnessed civil unrest and ethnic violence, typically related to cattle raiding activities. It stems from the Karamojong pastoralists' possession of around 40,000 small arms, which are frequently used to solve disputes. The Karamojong do not recognise the authority of the Ugandan state and UPDF operations to disarm the groups have been met with severe resistance.

Terrorism

Overview

Uganda carries a **Medium Risk** rating for terrorism.

International Terrorism: Uganda carries a medium risk rating for international terrorism. Both Uganda and Burundi have some 2,500 peacekeepers in Mogadishu with the African Union's AMISOM force, which is protecting key sites and the fragile Western-backed government. In retaliation for their participation in the peacekeeping effort, Somalia's al-Shabaab insurgent movement has issued repeated threats to attack **Kampala** and Bujumbura, the Burundian capital. The twin 11 July 2010 suicide attacks in **Kampala** followed two days after the last threat issued by al-Shabaab group commander Sheikh Muktar Robow. In January 2011, the United States Embassy in **Kampala** issued a terrorism alert warning of possible attacks by al-Shabaab, however the warning did not cite any specific threat.

Visitors to Uganda are advised to remain vigilant in their assessment of risk to personal security. The attacks of 11 July 2010 signal an important shift in al-Shabaab targeting patterns that threatens contributing countries to the African Union's AMISOM force in Somalia. Exercise general caution and immediately report suspicious packages and behaviour to authorities.

In February 2014, the United States Embassy in Uganda issued an alert regarding a "specific terrorist threat" involving a group of attackers ready to strike several targets inside **Kampala** in February or March. Information indicated that the **Ugandan National Museum (Kira Road)** in the capital was one of the potential targets. One month later, Kenyan police received intelligence that al-Shabaab militants were planning to attack fuel tankers in transit, fuel depots, petrol filling stations or tanker stopover locations in **Naluwerere**, **Mbiko**, **Lugazi**, **Nakawa**, **Buwama**, **Lyantonde**, **Ruti**, **Rubaale**, **Karuma** and **Elegu**. Security measures at these locations were increased, and all trucks leaving the **Busia** and **Malaba** border crossings from Kenya were given a police escort.

Months later, Ugandan authorities increased security in border areas in the wake of two deadly attacks by al-Shabaab in an area north of the Kenyan port city of Mombasa in June 2014. Elevated security measures included tighter screening at border crossings – including travellers' luggage, travel documents, vehicles and transit cargo – as well as increased overt and covert operations by intelligence services. Affected locations include **Katuna** on the border with Rwanda, **Orabu** on the South Sudan border and **Malaba** on the Kenyan border.

Response Preparedness: Ugandan state security and emergency services have struggled to cope with natural and man made disasters. With the exception of **Kampala**, emergency services are poor and lack the necessary equipment and training to respond to a mass casualty incident.

Though Ugandan authorities have reinforced controls of movements at all border crossings and interior checkpoints, security force have very little operational training in disaster response.

Unrest

Overview

Uganda carries a **Medium Risk** rating for unrest due to political violence and ethnic tensions.

On 29 September 2012, various opposition groups announced the resumption of the "For God and Country (4GC)" campaign to protest poor governance, poverty, unemployment, corruption and other issues. The 4GC movement was outlawed earlier in 2012, and authorities had stated that they would not tolerate demonstrations staged by the group.

Ethnic Tensions: April 2007 has witnessed widespread civil unrest and ethnic violence in Kampala. President Museveni decided to allocate Mabira Forest land to a sugar company (Scoul), belonging to a family of Indian descent. This sparked major clashes in and around the capital, with attacks on those of Indian descent. Environmentalists argue that the forest must be used for sugar plantation, as it will lead to the extinction of thousands of plant and animal species, but observers comment that clashes come in a tradition of resentment towards Asians living in Uganda. Severe fighting led to three deaths, one of which was an Indian man stoned to death. Police fired live bullets to disperse the crowds.

Protests and Demonstrations: Uganda carries a high risk rating for protests and demonstrations. Forum for Democratic Change chairman Kizza Besigye and his supporters began a series of "walk to work" demonstrations in April 2011 to protest against rising fuel and food costs. Security forces violently suppressed the weekly rallies, and Besigye was arrested several times, sparking further clashes with police in **Kampala**. The wave of protest, initially launched to address economic concerns, soon became a forum for opposition activists calling for Besigye to step down from power. Ugandan police were eventually forced to ban public rallies when the opposition Activists For Change movement called for a "regime change" demonstration in September 2011.

Visitors are advised to exercise caution and avoid large gatherings and public demonstrations.

Crime, Law & Corruption

Crime

Overview

Crimes such as pickpocketing, purse-snatching and theft from hotel rooms and parked cars occur throughout Uganda.

Robbery: There are also reports of travellers, especially on public transport, being offered food and drink laced with narcotics that incapacitates the victim who is then robbed. In December 2006 there have been cases of bus travellers going to the extreme southwest of Uganda being drugged and robbed. Armed robberies also take place, including in public places during day light hours. Housebreakings and theft from residential properties are common. Vehicle hijacking has also been experienced, particularly between populated areas, as have armed highway robberies. Visitors are advised to not travel outside of major towns at night and to be aware that women drivers are particularly targeted.

Vehicle Theft: In recent months there has been an increase in theft from vehicles and muggings, some involving

violence, in the **Kololo Airstrip area of Kampala**. We strongly recommend that after dark, foreign visitors avoid going out on foot.

Lock doors and windows at all time when in built up areas. Thefts from vehicles while in traffic are not uncommon. Do not drive outside major towns or cities after dark as there have been incidences of armed carjacking. If you are a victim do not resist, this will greatly decrease your chances of being harmed.

Financial Fraud and Scams: There has been a rise in financial crimes and visitors are advised to be wary when banking, using Automated Teller Machines and cheques.

Take extra care when changing money and do not do use street money changers. These are often con men that may cheat you or simply take your money.

Petty Crime: Muggings and drive by bag snatches occur in the main cities. Do not carry anything with you that cannot be replaced. Passports and other important documents should be left in a safe place in your hotel, be sure to make a copy and keep this separate. Passport theft is currently the most reported crime by visitors to the country.

The capital city of **Kampala** is considered relatively safe as tourists frequenting local markets and stalls usually do so unabated. But opportunistic crime such as burglaries, muggings and drive-by bag snatches do occur occasionally in **Kampala**. There have been reports of an increase in theft from vehicles and muggings, some involving violence, in the **Kololo Airstrip area of Kampala**. The **Usafi Market, Entebbe Road, Main Bus Park and Pan African Freedom Square in central Kampala** are known hubs for petty thieves and should be avoided after dark.

When residing in urban areas, visitors are advised to keep doors and windows locked at all times as home burglaries do occur. There have also been reports of muggings and armed robberies occurring in whilst private and public vehicles are stationary in public. In such incidents handbags, cellular phones and jewelry are the most common targets for criminals.

Visitors are advised not to accept any food and beverages from strangers, including children, as these items may contain narcotics used to incapacitate victims and facilitate a robbery. Travelers frequenting bars and other entertainment areas are particularly at risk. In 2006, an American citizen traveling by bus from Kenya to Uganda was incapacitated and robbed on the bus when the passenger accepted a sealed beverage from a fellow passenger.

Although the aforementioned crimes may not include physical violence, visitors are advised to comply with the demands of potential thieves.

Banditry: Visitors should be aware of threats to their safety from insurgent groups, particularly in the northern region near the border with Sudan, along the western border with the Democratic Republic of Congo, and in the southwest near the border with Rwanda. Insurgent groups have at times specifically targeted Westerners. They have engaged in murder, armed attacks, kidnapping, and the placement of land mines. Although isolated, incidents occur with little or no warning. Armed banditry is common in the **Karamoja region** in northeastern Uganda.

It is advised not to travel to northern Uganda (**Kitgum, Pader, Adjumani, Gulu, Apac and Lira districts**), **West Nile (Nebbi, Arua, Moyo and Yumbe districts** in Uganda's far north west), or the **Karamoja region** in northeastern Uganda (**Kotido, Moroto, Nakapiripirit and Katakwi districts**). This area also covers the **Kidepo National Park**. The **Murchison Falls National Park** should also be avoided.

Law

Overview

As of 1995 the Ugandan state has adopted a legal system heavily based on English common law and customary law. The judiciary is influenced by government. In March 2007 Uganda's lawyers staged a three-day peaceful protest against the government's interference in the judiciary, after security forces entered the High Court.

Once imprisoned in Uganda, there are frequently long delays in judicial processing. Food, sanitation, and medical care in the overcrowded Ugandan prisons are poor.

Photography: Photographing tourist destinations is permitted, but the photographing of military installations and

government buildings is prohibited. Military and police officers have detained tourists for taking photographs of part of **Entebbe Airport** and of the area around Owen Falls Dam.

Homosexuality: Homosexual acts are illegal in the highly religious and generally conservative country. The government is planning to further strengthen legislation in this regard with the internationally-condemned Anti-Homosexuality Bill, which it re-introduced in August 2014 after a court struck down the first version of the law on a technicality in February.

Drugs: The punishment for the use, trafficking or possession of illegal drugs is severe.

Corruption

Overview

Corruption is a problem in Uganda, pervading politics and business. In its annual 2016 global survey, the Berlin-based corruption watchdog Transparency International (TI) ranked Uganda 151 of 176 states on a sliding scale measuring perceptions of endemic corruption, on par with Tajikistan, Comoros and Turkmenistan.

Low level corruption is endemic in most parts of Uganda, particularly **Kampala** and **Entebbe**. Foreign nationals are often targeted at airports and government offices for bribes.

Travellers: Foreign nationals can often be solicited for bribes by public officials, especially the police and border/customs officials. Bribery is illegal in the Uganda and foreign nationals should never offer bribes to any officials to avoid arrest and prosecution. However, there is poor enforcement of these laws and minimal instances of prosecution.

Residents: When applying for Visas, work/residency permits it is common to be offered 'efficient' service in exchange for a bribe. Using a relocation agency/lawyer is a useful alternative to avoid these situations. Traffic police might demand 'on the spot fines' for supposed infringements. This is illegal and should be refused and reported at a police station.

Business: When applying for government tenders, especially, businesses should avoid offering 'incentives/commissions' to officials involved in tendering processes. European businesses are advised to comply with the OECD conventions and protocols on corruption so as to avoid possible prosecution in their home countries.

Security Services

Police

Efficiency: Police in Uganda are considered to be ill equipped and untrained. They are a small force that are generally suited and used for public order policing rather than crime combatting and prevention. They are under-resourced and poorly designed. A typical police station has few phone lines, limited communications and few vehicles.

Professionalism: Police in Uganda are considered to be corrupt and will often demand "donations" to complete certain tasks. Corruption is a widespread problem and senior police officers tend to be loyal to the regime of Yoweri Museveni. It is not uncommon to be expected to pay 'spot fines' by low level police officers. Foreign nationals are advised to politely refuse such overtures and report them immediately to your relevant embassy or senior police officials.

Abuses: Police are often quite violent in their public order policing duties as there is considerable opposition to the current regime. Protests are frequent and have a tendency to become violent. Foreign nationals should avoid such demonstrations at all times as police often arrest by-standers in addition to protestors.

Military

Overview

The military plays a large role in domestic security in support of the police. Foreign nationals are likely to encounter military personnel most frequently at roadblocks throughout the country, especially in and the northern areas and along the border areas with Rwanda, DRC and Sudan.

Efficiency: The military, especially the army, is grossly underfunded, ill-equipped and poorly trained. Foreign nationals should always approach checkpoints slowly and stop when ordered to do so. Soldiers will not hesitate to use force when vehicles do not stop at checkpoints.

Professionalism: The military has a history of unprofessionalism, much of it due to poor training and funding. The military is known for ill-discipline and to participate in corrupt practices. Much of this is due to continual conflict with the LRA in the north, They have also been known to solicit bribes and demand spot fines at check points. These should be politely refused.

Abuses: The Ugandan military has an internal security function and are largely used to support the police in public order operations and quelling dissent. The conflict with the LRA often sees the military participating in various abuses of civilians. It is best for foreign nationals to avoid these areas at all times.

Natural & Health Risks

Natural Risks

Overview

Uganda has a **Medium Risk** natural hazards rating. Flooding and earthquakes constitute the main risks posed to travellers in-country.

Flooding: The rainy season is from March to May and again from October to November when flooding occurs. The flooding makes many of the unpaved roads impassable.

If instructed of the possibility that flash-flooding may affect the area you are in, monitor local updates and move immediately to higher ground away from rivers, streams, creeks, and storm drains. Though flash flooding is commonly attributable to excess upstream precipitation, be aware that flooding can occur without typical warning signs of rain clouds or heavy rain. This is especially true near streams, drainage channels, canyons, and other areas known to flood suddenly.

If you happen across a flooded road in your car, turn around and drive in the opposite direction. If you are caught on a flooded road and waters are rising rapidly around you, get out of the car and climb to higher ground.

Earthquake: Uganda is situated in an earthquake prone region known as the East African Rift System and earthquakes can occur often.

Reducing risk of injury in an earthquake requires careful planning and risk mitigation strategies. When shaking begins: Take cover under a heavy desk or table that can provide you with air space if the building collapses. If you're not near a table or desk, stand or crouch in a strongly supported doorway or inner corner of the house away from window or glass panels. Most deaths and injuries in an earthquake are caused by collapsing building materials and heavy falling objects. Stay indoors until the shaking stops and you're sure it's safe to exit. The greatest danger from falling debris is just outside doorways and close to outer walls. Stay away from windows. In a high-rise building, the electricity may go out, and the sprinkler systems may come on. DO NOT use the elevators. If the lights go out, avoid using candles, matches, or lighters during or after the earthquake. If there is a gas leak, an explosion could result.

Be prepared for secondary earth movements that follow the initial earthquake called 'aftershocks.' Some of these may be large enough to cause additional damage or bring down weakened structures.

Health Risks

Overview

Uganda has a **Medium Risk** health rating. Medical infrastructure is poor throughout the country, and levels of expertise and professionalism are low. In the case of emergency or serious illness evacuation to a regional centre with appropriate facilities is essential. Travellers are advised to have full medical insurance, with the option of air evacuation during an emergency.

HIV/AIDS, malaria, tuberculosis, and diarrhoeal illnesses are prevalent health issues. A yellow fever vaccination is mandatory when travelling to Uganda, although several other vaccinations are strongly recommended.

Overall, the standard of medical care in Uganda is poor. Across the country, medical care is basic or completely lacking. Medical supplies and medicines are in short-supply. Medical facilities are generally limited in Uganda but better in **Kampala** than in other areas. Some medicines and equipment, particularly outside of **Kampala** are in short supply. Generally, the standard of medical care is basic and not equipped to handle complex emergencies.

There are few trained medical personnel and the sanitary levels of facilities are not always high. Most doctors and hospitals require payment in cash, regardless of whether travellers have health insurance. There have been reports of health professionals demanding payment or bribes in exchange for medical care.

Emergency Services: There are limited emergency medical services in both **Kampala** and **Entebbe**. Visitors are advised to have travel insurance that includes emergency medical evacuation. This should cover emergency airlift to Nairobi in Kenya in the event of a serious medical emergency.

Vaccinations and Documentation: Proof of vaccination against yellow fever is required from all travellers over one year of age arriving from a yellow-fever-infected area. For full protection against in-country health risks obtain vaccinations for hepatitis A (at least two weeks before departure), hepatitis B (especially if visiting for more than 6 months), polio (one-time booster shot for extended travel to rural areas) and rabies. Ensure routine vaccinations are up to date for influenza, measles/mumps/rubella (MMR) and diphtheria/pertussis/tetanus (DPT). Additional medication to be purchased before travel may include malarial medication, anti-diarrhoeal medicine and rehydration tablets.

Required Vaccinations: yellow fever.

Recommended Vaccinations: hepatitis A; hepatitis B; polio; rabies; MMR; DPT; malarial medication (mosquito bite prevention plus atovaquone/proguanil, doxycycline or mefloquine).

Common Ailments

Riskline recommends that you see a health care provider who specialises in travel medicine before your trip. If you have a medical condition, you should also share your travel plans with any doctors you are currently seeing for other medical reasons. The list below is designed to highlight the most serious ailments that may affect your trip and is not exhaustive.

Malaria: A malaria threat is present in all parts of the country. Uganda is home to a particularly virulent strain of malaria that is resistant to the common anti-malaria medicine chloroquine. All regions of the country are equally affected and should appropriate measures should be taken at all times while in-country.

Tuberculosis: TB is problematic in mostly urban areas of **Kampala** and **Entebbe**, especially in the slum areas. Tuberculosis is a high risk, with a prevalence of 100 per 100,000 of the population. Like the common cold, tuberculosis is spread through the air. Only people who are sick with TB in their lungs are infectious.

Tuberculosis is prevalent in over 335 per 100,000 head of population. If you intend to stay for more than three months you should consult your doctor to guard against this.

Cholera: There are regular outbreaks of cholera across all of Uganda. In early 2008, an outbreak occurred in **Kampala**. An outbreak was reported in **Arua** and **Nebbi** districts in north western Uganda. And in December 2007 a cholera outbreak occurred in **Yumbe** district.

HIV/AIDS: HIV/AIDS is common in Uganda, with seven per cent of the adult population infected. Human Immunodeficiency Virus (HIV) is a retrovirus that induces Acquired Immunodeficiency Syndrome (AIDS). AIDS weakens

the body's immune system, making the body susceptible to numerous other diseases and ailments.

Yellow Fever: Yellow fever is an acute, haemorrhagic, viral disease that is transmitted by infected *Aedes* mosquitos, which usually bite during the day and are commonly found in densely populated areas. Before an outbreak was reported in northern Uganda in November 2010, the disease was last recorded in the country almost 40 years ago.

Pre-departure vaccination is the single most important prevention measure. Visitors to affected northern districts should also apply mosquito repellent containing 20% to 30% DEET from dawn to dusk, and wear long sleeves and long pants for best coverage when outdoors (yellow fever, unlike malaria, is transmitted by a type of mosquito which is active only during the day). Seek medical evaluation where infection is suspected.

Ebola hemorrhagic fever (Ebola HF): There is no cure or vaccine for Ebola, which manifests itself as a hemorrhagic fever, is highly infectious and kills quickly. The virus is transmitted by close contact and body fluids such as saliva, vomit, faeces, sweat, semen and blood. Victims often die of shock and symptoms can be vague, including fever, muscle pain, and nausea. An outbreak of Ebola hemorrhagic fever in July 2012 killed 19 people in Uganda's western **Kibaale district**, about 170 km (100 miles) from **Kampala**.

Marburg hemorrhagic fever (Marburg HF): Marburg hemorrhagic fever (Marburg HF) is a rare and deadly disease thought to be carried by African fruit bats. Those in close contact with people who have contracted the virus are at highest risk. Symptoms include fever; severe headache; muscle aches; rash on the chest, back, or stomach; nausea; vomiting; chest pain; sore throat; abdominal pain; and diarrhea. Severe symptoms include jaundice (yellowing of skin and eyes), severe weight loss, shock, massive internal bleeding, and failure of multiple internal organs. Outbreaks tend to occur between June and September. This is the period when villagers who go into the wild to collect fruit are likely to come into contact with wild animals such as fruit bats, a natural vector for the Marburg virus. There is no vaccine or specific treatment for the disease, and death is reported in 80 percent or more of cases, usually within eight to nine days.

Personal Safety

Travel

Local Travel

In general extreme caution should be exercised when travelling throughout the country by road.

Roads are poorly lit and maintained. Most drivers are unlicensed and untrained often exhibiting recklessness when utilizing roadways. Poor drivers and poor driving conditions have resulted in numerous fatalities in the country.

Travel Safety

Air Travel and Airports: A number of international carriers have daily flights into **Entebbe** and local airlines connect with major African countries including Kenya, South Africa and Egypt. Entebbe International airport is located 40km southwest of **Kampala**, and is linked to the capital by a direct taxi service. Facilities include 24hr banks, duty free shops, a number of restaurants, a business centre, and car rental from Hertz and Avis. Chauffeur driven vehicles are also available for hire and there is a shuttle bus service to major hotels. Local commuter buses reach the capital in one hour, travelling via **Entebbe**. It is recommended to take a taxi whenever possible.

On 3 July 2014, the United States Embassy in **Kampala** reported that the Uganda Police Force (UPF) received intelligence that an unknown terrorist group planned to attack the **Entebbe International Airport (EBB/HUEN)** between 21:00 and 23:00 local time (18:00-20:00 GMT). There were no reported incidents that day. Nevertheless, travellers are advised to remain vigilant at all times and immediately report suspicious behaviour and packages to local authorities.

Visas for many nationalities can be obtained on arrival, but visitors are often faced with a long wait at the airport. It is recommended to obtain all the necessary documents before arriving in the country.

Road Travel: Traffic moves on the left in Uganda. The roads are of variable quality and radiate from **Kampala**, although the network is sparse in the north. There are still some army and police check points on roads, which must be respected. The speed limit is 50 mph (80 kph) or 62 mph (100 kmh) on highways.

Driving standards are low, vehicles are poorly maintained, large potholes are ubiquitous and adequate signage and shoulders are almost non-existent. Highway travel at night is particularly dangerous. Pedestrians often walk in the roads and may not be visible to motorists. Always keep vehicle doors locked.

When involved in an accident, bear in mind that such incidents attract major crowds. Ugandan law requires that the driver stop and exchange information and assist. However, where serious injury has occurred, there is the possibility of mob anger. In these instances, it is advisable not get out of your car but drive to the nearest police station to report the accident. In an emergency, call 999.

You should be extra cautious when using the following highways:

- **Kampala** to Nairobi
- **Kampala** to Kigali
- **Kampala** to Dar es Salaam
- **Kampala** to Jinja
- **Kampala** to Masaka

Public Transport

Taxis: Most inter-city transportation in Uganda is by small van ("matatu") or large bus. Many drivers of these vehicles have little or no training and are often reckless. These vehicles are usually poorly maintained, travel at high speeds, and are prone to accidents.

Motorcycles for hire, commonly known as 'boda bodas', are inherently dangerous at all hours of the day given the combination in Uganda of poor roads, poorly maintained vehicles, and erratic driving behavior. Boda boda customers and drivers are frequent victims of serious auto accidents. Additionally, boda bodas are associated with both petty and serious crime. Due to the inherent danger and general criminal activity associated with riding boda bodas, Riskline strongly advises against use of the motorcycles after daylight hours.

Buses: There is an efficient network of buses traveling between major towns and cities. Companies, including the Gateway Bus service, Regional Coach and Akamba, all have offices in **Kampala** and can provide services both domestically and internationally. The Post Bus service, run by the Ugandan Post Office, is widely considered the safest, and is the first choice of foreigners and NGO workers living in the country.

There have been a number of serious accidents involving long distance buses services between **Kampala**, Nairobi, Kigali and Dar es Salaam. There have also been incidents on overnight buses between Nairobi and **Kampala** when bandits posing as passengers have forced buses to stop and have robbed the passengers. Visitors are advised not to travel on these overnight long distance buses.

Trains: After more than 20 years, train service resumed in Uganda in November 2015. Uganda Railways Corporation (URC) will operate one line between **Kampala** and **Namanve**, via **Namboole**, **Kireka** and **Nakawa**, for a one-year trial. The service is cheaper than comparable matatu bus routes.

Country Hotspots

Regions: Due to the regions conflict-ridden past there are some areas that are considered unsafe. Riskline urges caution against travelling to the following areas:

Northern Uganda:

Northern Uganda, including the districts of **Kitgum, Pader, Adjumani, Gulu, Apac and Lira**, should be avoided. There is still a large presence of the LRA (Lord's Resistance Army) in this area and the risk of rebel insurgency and banditry is high. The government signed a 'Cessation Of Hostilities' agreement with the LRA in April 2007, but as yet, the areas under their control are still considered unstable.

North West Uganda:

All but non essential travel to the region known as **West Nile (Nebbi, Arua, Moyo and Yumbe districts** in Uganda's far north west) should be avoided. A LRA presence in the Democratic Republic of Congo (DRC) has resulted in the stationing of the Ugandan Armed Forces within the immediate vicinity.

There is thus a strong possibility that armed clashes between rebel and government forces may occur if the tentative peace agreement fails.

Murchison Falls National Park in the North West is considered unsafe. A tourist was murdered here in 2005.

North East Uganda:

The **Karamoja region** (comprising the five districts of **Abim, Kaabong, Kotido, Moroto and Nakapiripirit**) is the least developed part of Uganda and is plagued by lawlessness, disease, hunger and a gun culture among tribes who steal each other's cattle.

Government attempts to pacify the region, which have continued for years with little success, have been plagued by allegations of widespread atrocities and the torture of civilians.

West Uganda:

The **Budibugyo district** should not be visited due to the presence of the ADF (Allied Democratic Forces). This area has witnessed violent clashes between rebel groups and the military. Check the local situation on the ground before attempting to visit **Semliki National Park** which lies within this area.

On 3 August 2007, Carl Nefdt, a British national, was killed during an armed clash on **Lake Albert**. If travelling by boat on **Lake Albert** you should be aware that the border with the DRC passes through the lake. Care should be taken to avoid the border area unless all arrangements have been made in advance with both the Ugandan and DRC authorities.

South West Uganda:

Visitors seeking to visit the south western regions of Uganda, including the **Bwindi and Mgahinga national parks**, are advised to do so with extreme caution. The border between Uganda and the DRC has a history of instability and violence may erupt with little to no warning.

Armed banditry occurs frequently in this region and it is recommended that travellers avoid travelling at night.

Border areas:

Elevated security measures were put in place at border crossings in the wake of two deadly attacks by al-Shabaab in an area north of the Kenyan port city of Mombasa in June 2014. They included tighter screening at border crossings – including travellers' luggage, travel documents, vehicles and transit cargo – as well as increased overt and covert operations by intelligence services. Affected locations include **Katuna** on the border with Rwanda, **Orabu** on the South Sudan border and **Malaba** on the Kenyan border.

Safety

Women: Women travelling alone are more at risk of crime. Lone female travellers are advised to not walk alone, particularly at night.

A 2014 law made it illegal to wear revealing clothing, including tops that show cleavage and skirts above the knees.

Short skirts are often worn by young women in **Kampala**, and many critics believe the law will be difficult to enforce. Nevertheless, female visitors to Uganda are advised to dress conservatively to avoid attracting unwanted attention.

Public Safety: Do not travel on foot at night and take a taxi even if it's only for a short distance. The **Kololo Airstrip area of Kampala** is considered particularly dangerous.

As petty theft is considered rampant in both public places and in public transportation across Uganda, visitors are advised to refrain from displaying wealth and limit the amount of money and jewellery carried on their person. Visitors are also advised not to accept any food and beverage from strangers when visiting the country, as these may contain narcotics that are used by criminals to facilitate theft.

Police: Police in Uganda are considered to be ill equipped and untrained. A typical police station has few phone lines, limited communications and few vehicles. Police in Uganda are considered to be corrupt and will often demand 'donations' to complete certain tasks.

Food and Drink: All water should be regarded as a potential health risk, and thus should be boiled or sterilised before consumption, or before brushing your teeth. Milk is unpasteurised, and it is advisable that powdered or tinned milk is consumed instead. Likewise, avoid any dairy products that could have been made from unpasteurised milk. Vegetables should be cooked and fruit peeled. Only well-cooked meat and fish should be eaten.

Begging: Begging is becoming more prevalent in Uganda, especially in the capital, Kampala, due to an influx of refugees from the country's troubled northern region. Most often, advances are not threatening, and it is up to the individual whether they give a donation or not. In the more tourist-prone areas, children are resorting more and more to begging, and visitors are advised not to hand out money or sweets, as this will only encourage harassment.

Racial Discrimination: Racial tension between the black and Asian communities is still prevalent in Uganda today. Originating from Idi Amin's hate campaign against south Asian merchants in 1972, racial violence between the two groups has occurred sporadically over recent years. The most recent incident occurred in the capital city of Kampala in April 2007, when protests against government plans allowing Ugandan-Asian industrialists to grow sugar cane on protected forest land turned violent, resulting in the death of three people. All travellers are advised to avoid large groups of people and other social gatherings, whilst visitors of south-Asian descent are advised to take additional security measures if racial violence does indeed erupt within the country.

Landmines and Unexploded Ordnance: Following years of conflict between Uganda People's Defence Force and the Lord's Resistance Army in northern and western parts of Uganda (particularly **Gulu** and **Amuru** districts), large swathes of land were left heavily contaminated by landmines and other explosive remnants of war (ERW). In 2006 there were some 300 civilian victims of explosions from mines and other ERW. By 2012 reported fatalities had dropped to three. All identified minefields in the country were certified cleared by December 2012. Visitors to at-risk areas should nevertheless avoid straying off-path.

Pollution: Pollution in Uganda is deemed to be steadily rising. The wetlands of **Nsoba**, **Nalukolongo**, **Kansanga**, **Kiwembo**, **Lubigi**, **Nakivubo** and **Kirombe swamp system** have been substantially contaminated by both domestic and industrial waste. The waste, which usually comprises of toxic chemical, metals and oils, has made its way into the food chain as the effluent has either been absorbed in the soil or been ingested by the fish in the surrounding lakes. Contaminated wetlands have become the focal point for urban agriculture within Uganda and many of the produce grown in these areas are considered to be contaminated and highly toxic.

Visitors are thus advised to refrain from eating any produce cultivated from urban areas whilst also limiting their intake of fish products.

Water Safety: Water pollution resulting from untreated discharges from breweries, textile industries, leather tanning and sugar industries makes the consumption of tap water in Uganda highly inadvisable. Sporadic outbreaks of cholera across the country further reiterate that precautionary measures should be taken when consuming tap water within Uganda.

Visitors are thus advised to only consume bottled water and refrain from drinking tap water unless it has been boiled, filtered or chemically disinfected. Travellers are advised to refrain from consuming unpeeled fruit and vegetables and from drinking beverages that contain ice cubes.

Protests: Although political protests and demonstrations in Uganda may often seem peaceful and harmless, violence may occur at any time and without warning. Visitors are thus advised to refrain from attending public and other social gatherings.

Culture

Religious Sensitivities: Uganda is made up of Roman Catholics, Protestants and Muslims, with the first two groups being the largest. Generally, Ugandans are religious. The Pentecostal church has also becoming increasingly popular in recent years. Dress conservatively when visiting any religious buildings or sites and always seek permission before taking photographs.

Political Sensitivities: Uganda has been engrossed in a protracted civil war for many years, and although most of the country has resumed in its peacetime activities, the northern region of the country is still experiencing an insurgency. As the legacy of the civil war is still freshly instilled in the majority of the populace, foreign visitors are advised to refrain from engaging in any conversation concerning either the war or the current political situation in the country.

Homosexuality is illegal and is frowned upon by the majority of the population. There have been recent cases of locals being prosecuted for homosexual acts. Be discreet in public places.

Drug use is not acceptable and the penalties for trafficking are severe. Drug users are looked upon as very low by the majority of society.



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Michael Howarth

From: Tammy Chu
Sent: Friday, 21 October 2016 7:18 PM
To: Angus Swindon
Cc: Ajay Sharma
Subject: Uganda hydropower site visit

Gus,

Happy to discuss, but I thought I should update you with the thinking for Uganda, and to seek your thoughts. I left a message on your phone.

I have had Dynamiq advise of the safety in Uganda and the site area and am satisfied that it is within our safety guidelines. The site is a secured campsite with 24/7 local security and medical facilities. Uganda is Ebola free, however yellow fever vaccinations etc are required.

The Karuma project has gained some attention which covers corruption, 2 deaths on site and poor quality allegations. I suggest that we can support Huadong but with a limited site visit to assist them with an expert panel discussions for one week. We then debrief about site conditions and the project issues to assess whether we wish to be involved in a longer term matter, and support their original scope request. I think the brand and reputation risk is low/medium for a short term assignment.

Huadong is seeking 2 engineers and our proposal for an Indian engineer is unsupported, due our Indian engineer only being available for a few days due to Dwali festival.

I therefore propose that Richard Herweynen and Nick West are assigned to the visit. Both appear to be available and willing to travel. Departure would not be until Tuesday to allow Monday for flight confirmations, logistics, planning/JHAs and a visit to the travel doctor.

Ajay is preparing a letter proposal and Chunhua has verbally advised of the fee structure. Accommodation will be provided, along with logistical support from airport.

Let me know if you wish to discuss or give me a call.

Regards Tammy



Michael Howarth

From: Kel Donovan <Kel.Donovan@dynamiq.com.au>
Sent: Saturday, 22 October 2016 3:08 AM
To: Tammy Chu
Subject: Re: Safety in Uganda

The vaccination does take 10 days to become effective. In the past, if you didn't have a yellow fever Cert you would have trouble reentering Australia. It would not hinder you in Africa. The Australian requirement for a Yellow Fever cert has recently been relaxed. BioSecurity still encourage the vaccination for travel in Africa, but you won't have any trouble re-entering Australia if you don't have one. If you attempt to come back to Australia without a cert AND you are displaying symptoms of yellow fever, you may get landed in quarantine. Symptoms take almost a week to appear.

In any case, prevention is best, so use effective mosquito repellent and cover skin where possible.

Kel Donovan
[REDACTED]

> On 21 Oct. 2016, at 8:19 pm, Tammy Chu <Tammy.Chu@entura.com.au> wrote:

>

> Sorry Kel, I have one query has arise regarding yellow fever.

>

> Once a yellow fever vaccination is undertaken the certificate takes 10 days to take effect. Does this cover Australia as this is the case for our Indian personnel?

>

> I can confirm with our travel doctor as well.

>

> Tammy

>

>> On 21 Oct 2016, at 6:18 PM, Kel Donovan <Kel.Donovan@dynamiq.com.au> wrote:

>>

>> You're very welcome Tammy. I hope the visit is a rewarding one for you.

>>

>> Kel Donovan

>> [REDACTED]

>>

>>> On 21 Oct. 2016, at 3:12 pm, Tammy Chu <Tammy.Chu@entura.com.au> wrote:

>>>

>>> Thanks very much Kel. This insight is very helpful to me.

>>>

>>> Regards Tammy

>>>

>>> On 21 Oct 2016, at 12:52 PM, Kel Donovan

<Kel.Donovan@dynamiq.com.au<mailto:Kel.Donovan@dynamiq.com.au>> wrote:

>>>

>>> Hi Tammy,

>>> In 2014 I travelled for two weeks in Uganda myself Tammy. It is a beautiful country and relatively safe to travel within with the only exception being border areas. Your proposed travel route is one of the safest in Uganda.

>>> I'd always avoid road travel by night in Uganda as the roads are not well marked or illuminated. Heavy rains in Uganda also cause havoc on the roads, so avoid travel in extreme weather or immediately post a heavy rain events.

>>> I have attached the country report for Uganda for your review. It provides some details about road conditions and other safety issues in Uganda including inoculations.

>>> If you have any questions after reading the report please let me know.

>>>

>>> Kel
>>> Kel Donovan
>>> Managing Principal
>>> T: +61 (0)7 3020 5803 [REDACTED]
>>> 042 | W: www.dynamiqglobal.com<http://www.dynamiqglobal.com/>
>>>
>>>
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>>>
>>>
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>>> anytime
>>>
>>> _____
>>>
>>> From: Tammy Chu [mailto:Tammy.Chu@entura.com.au]
>>> Sent: Friday, 21 October 2016 7:57 AM
>>> To: Kel Donovan
>>> <Kel.Donovan@dynamiq.com.au<mailto:Kel.Donovan@dynamiq.com.au>>
>>> Subject: Safety in Uganda
>>>
>>> Hi Kel,
>>>
>>> Just wondering if you or your team have any experience travelling in Uganda.
>>>
>>> We have been invited to attend a site visit for the Karuma Hydropower project, which is about 2-3 hours by road
'north of Kampala near Karuma Falls and close to Apac.
>>>
>>> According to DFAT Smart Traveller, this area is exercise a high degree of caution.
>>>
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>>> The project is under construction and a reasonable site camp has been established with about 650 staff working
on site. They have a closed site camp with accommodation and hired dozens of local security guards which provide
24 security services on site. Their also have their own fleet and will be able to collect our people from the airport
and travel directly to site. Do you have any insight into the road safety and security conditions?
>>> A medical camp has been established on camp with a clinic with Chinese (contractor is Chinese) and local
doctors which can provide basic medical services.
>>>
>>> We expect two people to be on site for 1 week and fly via Dubai into Kampala.
>>>
>>> My understanding is Uganda is free of ebola, but other vaccinations will be required. Eg yellow fever.
>>>
>>> Could you please advise any preliminary thoughts of travel in Uganda?
>>>
>>> Regards Tammy
>>> Tammy Chu | Managing Director
>>> BE(Hons)(Civil), FIEAust, MBA, GAICD <image010.jpg>
>>>

Michael Howarth

From: Jamie Campbell
Sent: Monday, 25 September 2017 9:52 PM
To: Mark Hine-Haycock
Cc: Tim Griggs (Tim.Griggs@entura.com.au)
Subject: Kampala security update

Might have a bit of a rough time getting back to the airport in a couple of weeks if the security situation in Kampala deteriorates. This is the latest advice from the US Embassy (Australia and the UK are useless at keeping things up to date here, have no idea what's going on). Effectively the government and police have locked up opposition members and some NGO people who are protesting removal of the presidential term limits.

U.S. Embassy Kampala, Uganda

21 September 2017

US Embassy Kampala informs US Citizens that there is widespread deployment of government security forces throughout the city, particularly near Parliament and Makerere University. We have received reports of tear gas being deployed as well as gunshots. The following map depicts areas where motorists may experience problems including heavy traffic congestion over the next few days due to increased government security operations in central Kampala. Travellers should avoid crowds, refrain from photographing security personnel, and use alternate routes when possible. Areas recommended to avoid include:

- Downtown Kampala
- Kiseka Market Area
- Clock Tower
- Makerere University

Vehicle and pedestrian traffic is expected to be heavy during this time. Please make use of radio, television and alternate means of information sources.

It's pretty difficult to avoid all these areas and still get to the airport with all the work being done on the Northern Bypass, however we'll see what it's like closer to the date.

Regards

Jamie Campbell | Senior Dams and Geotechnical Engineer
BE (Civil, 1st Honours)

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Michael Howarth

From: Tammy Chu
Sent: Friday, 21 October 2016 5:33 PM
To: Angus Swindon; Ajay Sharma
Subject: FW: Safety in Uganda
Attachments: Uganda Security Report.pdf

Gus and Ajay,

See additional safety advice from Dynamiq

Tammy

Tammy Chu | Managing Director
BE(Hons)(Civil), FIEAust, MBA, GAICD



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From: Kel Donovan [<mailto:Kel.Donovan@dynamiq.com.au>]

Sent: Friday, 21 October 2016 12:52 PM

To: Tammy Chu

Subject: RE: Safety in Uganda

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Kel

Kel Donovan

Managing Principal

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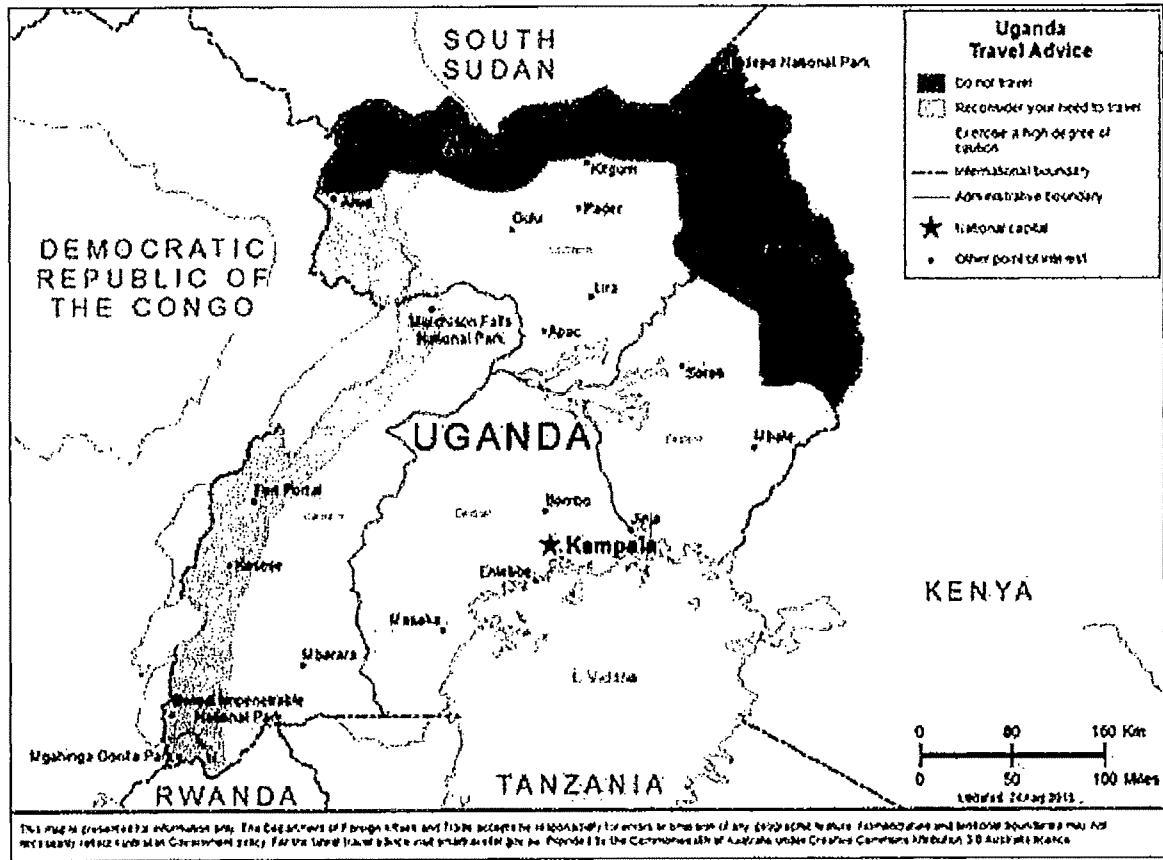
From: Tammy Chu [mailto:Tammy.Chu@entura.com.au]
 Sent: Friday, 21 October 2016 7:57 AM
 To: Kel Donovan <Kel.Donovan@dynamiq.com.au>
 Subject: Safety in Uganda

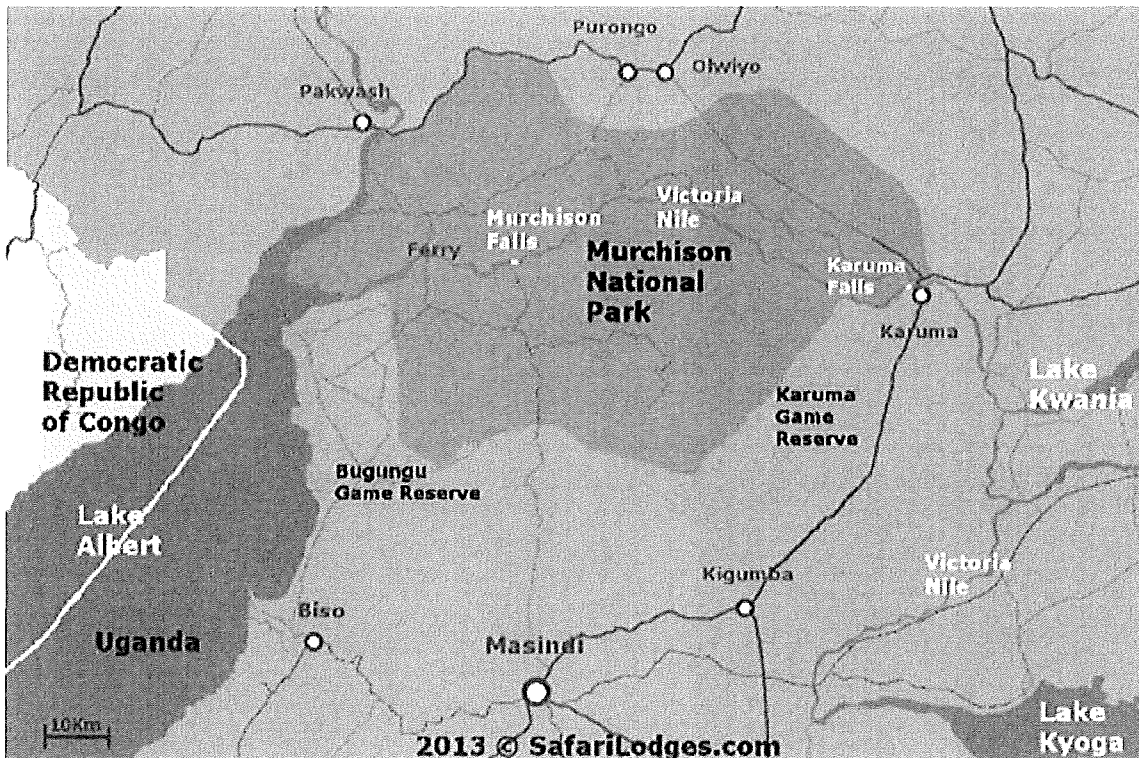
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According to DFAT Smart Traveller, this area is exercise a high degree of caution.





The project is under construction and a reasonable site camp has been established with about 650 staff working on site. They have a closed site camp with accommodation and hired dozens of local security guards which provide 24 security services on site. They also have their own fleet and will be able to collect our people from the airport and travel directly to site. Do you have any insight into the road safety and security conditions? A medical camp has been established on camp with a clinic with Chinese (contractor is Chinese) and local doctors which can provide basic medical services.

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Regards Tammy

Tammy Chu | Managing Director
BE(Hons)(Civil), FIEAust, MBA, GAICD



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A. Detailed sustainability screening of Karuma Hydropower Project

Project	Karuma Hydropower Project
Brief project description	<p>The Karuma Hydropower Project (the Project) is a 600MW dam and power station currently under construction in Uganda. The project commenced construction in 2013 and completion is expected by 2018/19. The Project is being funded by China's EXIM Bank (85%) and the Ugandan Government (15%).</p> <p>The Project is being constructed by the Government of Uganda through the Ministry of Energy and Mineral Development (MEMD). Sinohydro were awarded an EPC contract for the Project. The implementing agency is the Uganda Electricity Generation Company Ltd (UEGCL). Energy Infratech Private Uganda are the Project owners engineers and report to the MEMD. In 2015 UEGCL engaged AF Consults to supervise the project and report to the agency. Energy Infratech India have also been engaged to supervise the project and report to the MEMD. The Project governance is currently being streamlined and a steering committee has been established to oversee the remainder of the Project.</p> <p>There are numerous reports of both technical and governance issues associated with the Project. Most notably UEGCL engaged ELF Consulting Engineers to conduct an advisory review and high level independent audit of the Project which identified cracks on the concrete spillways and the use of poor quality materials together with numerous governance issues including poor supervision and monitoring, lack of skills and personnel and poor financial accountability. The quality of completed works is currently being investigated by the Ugandan parliament. There are also reports of mismanagement and possible corruption at both the MEMD and UEGCL in particular regarding probity surrounding the award for the EPC contract to Sinohydro and with MEMD's inaction over numerous concerns raised about Sinohydro's construction practices by Energy Infratech (it is noted that the Ministry blames Energy Infratech for lack of supervision).</p> <p>PowerChina Huadong has been undertaking the design for the Project. The designs produced by PowerChina Huadong are reviewed by Energy Infratech India and then AF Consult.</p>
Proposed role for Entura	PowerChina Huadong wishes to engage Entura as a sub-consultant to liaise on their behalf with the parties involved in the Project and to assist in the review of compliance to their design products.
Location (region/country)	Uganda
DFAT rating	Exercise a high degree of caution
Entura previous work history:	Established work relationship with Client (PowerChina Huadong). No history with the Project.

Project risk rating

What are the key environmental and social risks based on project type for the project (including boarder project if relevant) and, based on the known project description, what is the level of significance of these risks

Level of significance	Definition
Low	Not relevant, negligible or very limited in terms of magnitude and duration
Moderate	Low magnitude, limited in scale and duration, reversible/manageable
High	Medium to high impacts on communities and environment, medium to long term impact

Key environmental and social risks	Level of significance
Project affected communities and livelihoods	Medium
Resettlement	High
Stakeholder engagement	High
Labour and working conditions	High
Cultural heritage	Medium
Public health	Medium
Biodiversity and Invasive species, land clearance	Medium
Erosion and sedimentation	Medium
Water quality	High
Waste, noise and/or air quality	Low
Downstream flows	High
Land acquisition	High

Based on the above, what is the risk category of the project based on the project risk category definitions below?

Project risk rating [REDACTED]

Project risk category	Definition
P-Low	Project includes activities with minimal or no risks of adverse social or environmental impacts.
P-Medium	Project includes activities with potential adverse social and environmental risks and impacts, that are limited in scale/few in number, can be identified with a reasonable degree of certainty, are generally site specific, largely reversible and can be readily addressed through application of standard best practice, mitigation measures and stakeholder engagement implemented during Project implementation.
P-High	Project includes activities – either “upstream” or “downstream” activities – with potential significant, diverse, irreversible and/or unprecedented adverse social and environmental risks and impacts, and/or Project may or has raised significant concerns among potentially affected communities and individuals.

Assets and water resources

- Are there potential technical design issues that may lead to safety issues (e.g. flood management, dam safety) associated with the project. If so, provide detail on the issue(s), what they are and how they are being managed.

Widely reported issues with construction of the Project particularly issues with cracking in the concrete spillways, use of poor quality materials and poor workmanship. It is reported that unless these issues are rectified the durability of the project could be compromised which may lead to safety issues.

- Is there any evidence of commitment by the client to ensure the project is constructed and operated with sufficient resources to ensure it is fit for purpose? If so, provide detail.

PowerChina Huadong's intention to appoint Entura to carry out additional review of their designs and to liaise with other Project parties demonstrates their commitment to ensuring the project is fit for purpose. However, the commitment of other parties, in particular Sinohydro and the MEDM is unknown and the risk of the dam not being fit for purpose remains high.

Unmitigated risk rating 

Economic

- How is the project funded? Is there any evidence to demonstrate the project's ability to pay for services e.g. funded by ADB/WB, funded by company with known credit rating? Please provide details.

The project is being funded through a loan from China's EXIM Bank (or Import Export Bank depending on sources) and the Ugandan Government through Uganda's Energy Fund. It was reported in 2015 that Sinohydro had failed to pay premiums to a consortium of 23 insurance and re-insurance companies, and has instead questioned the 2013 contract. National policy requires all national projects to be insured with Ugandan insurance companies as a way of reducing capital flight and help deepen the domestic financial system. However, Sinohydro was uncomfortable with this arrangement. It is not clear if or how this has been resolved. The concern has been that the disagreement means that components of the project are not insured and Uganda could lose in the event of a catastrophe. Entura's client for the project is PowerChina Huadong. The risk of PowerChina Huadong being unable to pay for Entura's services is considered low.

Unmitigated risk rating 

Customers

- What benefits or values have been associated with the project? Who benefits and was there consideration of providing value to the broader customer base (including communities)? Please provide details.

The Project aims to reduce electricity tariffs to local customers who are currently reported to pay some of the highest tariffs in Africa. On a country wide scale the Project will meet Uganda's growing electricity demand preventing the need for power rationing and allowing for further development.

Unmitigated risk rating 

Community

- Have community concerns about social issues been raised regarding the project? If so, provide detail.

The project will displace approximately 300 people from four villages. Reported social issues include claims about lack of consultation, poor compensation that includes irregularities with valuations issues. Difficulties and complaints around land ownership and compensation amounts continue. The risk associated with community concerns including ongoing protests and legal challenges is considered high.

- For medium and high risk projects only:
 - Is there evidence that social risks have been or are planned to be appropriately assessed and mitigation measures identified? If so, provide detail.
 - Is there evidence that mitigation measures and monitoring has been incorporated into project design? If so, provide detail.

Energy Infratec prepared an Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) and Resettlement Action Plan (RAP) for the Project. The level of implementation and monitoring of the plans is not clear however, based on the reported protests it is likely that either the plans or their implementation have been inadequate.

Unmitigated risk rating [REDACTED]

Our people

- What is the DFAT travel safety rating and advice for the country/project area? Please summarise

DFAT travel rating for country and project area is 'exercise a high degree of caution'. The risk level is based on the threat of a terrorist attack, civil unrest and criminal activity.

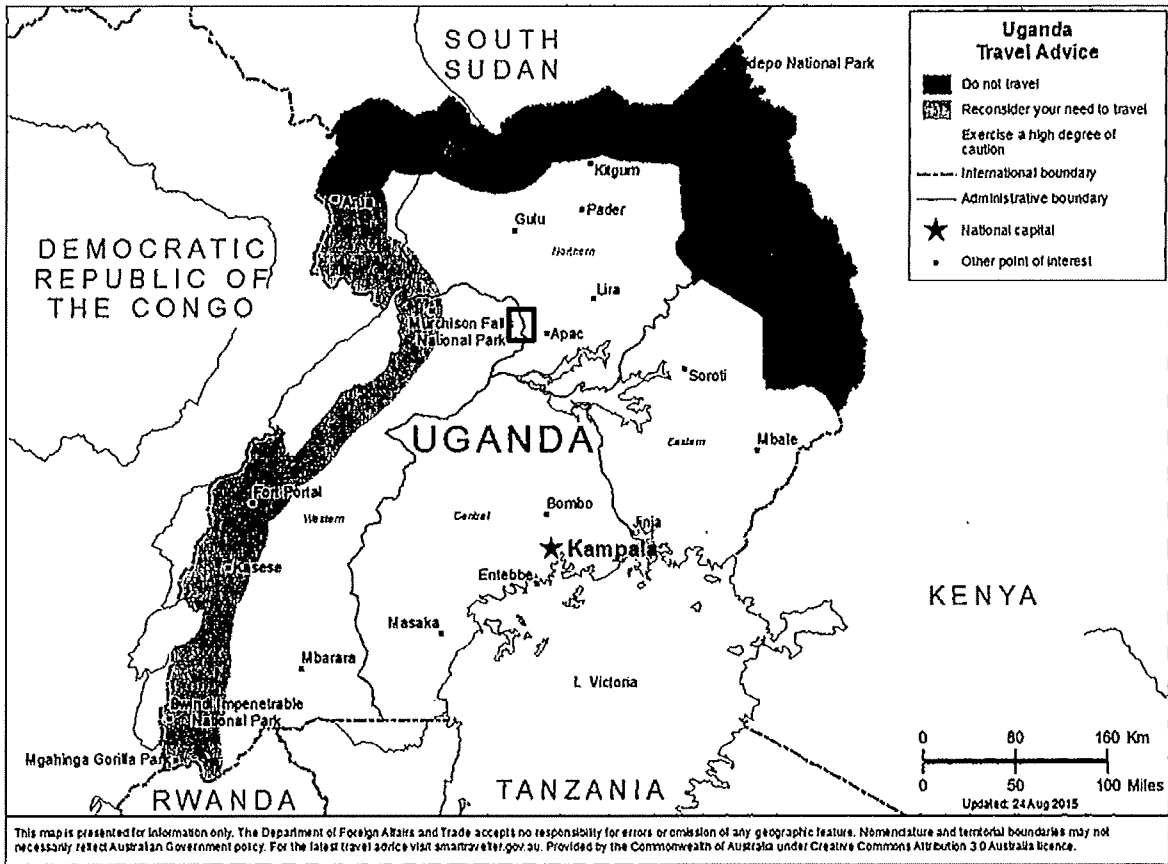


Figure A.1: DFAT travel advice map showing project location

- Is there evidence of that safety risks associated with the project have been or are planned to be evaluated including potential risks to the project workforce and associated communities, and increased vulnerability to earthquakes, landslides, subsidence, erosion, flooding or extreme climatic conditions as a result of the project? Please provide detail.

No evidence of safety management plans or equivalent was found during internet searches.

- Is there evidence of any safety incidents associated with the project related to the workforce or local community? Please provide detail regarding the incident(s).

Reports of Infratech raising concerns regarding workers occupational health and safety. No further information regarding specific issues was found.

- Have community concerns about safety been raised regarding the project? Please provide details on any issue(s), what they were and how there were managed.

Summary of community consultation presented in the ESIA does not identify any community concerns regarding safety.

- Have any industrial relations concerns been raised regarding the project? Please provide details on any issue(s), what they were and how they were managed.

In Jan 2016 there was a protest against Sinohydro by unemployed locals as Sinohydro gives preference to employing Chinese over local residents. This is in the context of promises from the Government of the project being able to provide employment to over 6000 direct jobs for community (which helped with initial community support for the project).

Unmitigated risk rating | C-Medium

** Note: if DFAT travel rating for project areas is higher than exercise normal safety precautions or exercise a high degree of caution, the following unmitigated risk rating applies.*

C-Medium	DFAT travel rating for the project location is <i>reconsider your need to travel</i>
	DFAT travel rating for the project location is <i>do not travel</i>

Environment and heritage

- Have environmental or heritage concerns been raised regarding the project? If so, provide detail.

The Project is located in the vicinity of the Murchison Falls Protected Areas including Karuma Wildlife Reserve. It includes a 12 km long diversion tunnel which is likely to impact local flora and fauna.

An ESIA and ESMP has been prepared for the Project. No significant environment or heritage concerns were identified in the ESIA.

There is evidence of violation of National Environment Authority Guidelines during construction.

- For medium and high risk projects only:
 - Is there evidence that environmental or heritage risks have been or are planned to be appropriately assessed and mitigation measures identified? If so, provide detail.
 - Is there evidence that mitigation measures and monitoring has been incorporated into project design? If so, provide detail.

The ESIA and ESMP identifies environmental risks and proposes mitigation strategies. A budget of USD\$20.5m was allocated in the ESIA for implementation of identified mitigation measures. No evidence was found of the incorporation of mitigation measures into the project design.

Given the proximity of the project to the Murchison Falls Protected Areas and the governance issues surrounding the project the risk is considered to be medium.

Unmitigated risk rating | C-Medium

Brand and reputation

- Is there evidence of community or NGO protests regarding environmental, heritage, social or safety issues associated with the project. If so provide detail regarding the protest(s) (when first raised, are they still current, issues raise, whether issues have been/are being addressed)

In Jan 2016 there was a protest against Sinohydro by unemployed locals as Sinohydro gives preference to employing Chinese over local residents. This is in the context of promises from the Government of the project being able to provide employment to over 6000 direct jobs for community (which helped with initial community support for the project).

There are a number of NGO's (national and international) watching the project and expecting

issues particularly as there is a perception that the Government has not learnt from the issues associated with the Bujagali Dam. These NGOs include International Rivers (watching dam projects in Uganda generally) and Friends of the Earth International.

- Is there any evidence of legal proceeding regarding the project (historic or current) in relation to sustainability issues i.e. bribery and corruption, human rights, environment, safety? Where there is evidence, what is the current status or outcome of the proceeding(s)?

It is reported that the Project has been subject to numerous legal proceedings. Recent examples include:

- In February 2016 the East African Court of Justice ruled that the Ugandan Government had disrespected its own procurement process in the cancellation of the best value bidding process and award of the project to Sinohydro.
- In May 2016 a public interest suit was filed in the High Court of Uganda against the Attorney-General of Uganda, Sinohydro, EXIM Bank and UEGCL seeking an independent engineering, financial and value for money audit be commissioned and consequential orders intended to correct the defects or to discontinue the two projects. A ruling is yet to be delivered.

In light of the protests and legal challenges relating to the Project and their wide spread coverage in local and regional media the risk of reputational damage is considered to be high.

Unmitigated risk rating

C-High

References

Governance

<http://www.monitor.co.ug/News/National/Kiggundu-to-oversee-Karuma-dam-project/688334-3351798-item-01-13dcdg/index.html>

<http://ntv.co.ug/news/local/15/oct/2016/parliaments-investigation-karuma-dam-project-halted-attorney-general-14621>

<https://www.internationalrivers.org/resources/uganda-s-dams-leave-affected-people-behind-8083>

Assets and water Resources

<http://256businessnews.com/sinohydro-concedes-to-defects-in-karuma-dam-concrete-works/>

<http://www.monitor.co.ug/News/National/Karuma-project-manager-confirms-shoddy-works/688334-3148984-1sinp1z/index.html>

<http://allafrica.com/stories/201604020212.html>

<http://www.monitor.co.ug/Business/Commodities/-Karuma-project-contractors-fly-in-experts-to-assess-dam-cracks/688610-3169898-oqrpqf/index.html>

<http://www.chimpreports.com/museveni-loses-temper-as-engineers-mess-up-karuma-isimba-dams/>

The top story in the Ugandan Daily Monitor questions the long-term structural viability of the Karuma and Isimba dam projects. According to the Kampala-based daily, a report from the ad hoc committee investigating shoddy works and negligence by contractors and government officials at the Karuma

and Isimba hydropower projects has revealed a hair-raising mess. The leaked report warns that if the defects on the two dams, which are to cost nearly 2 billion euros, are not rectified, and supervision and management streamlined, the durability of the projects could be compromised. The report speaks of a 'cancer of the structure' which would not be immediately obvious but could have dangerous long-term implications. Corrosion and the use of inferior grades of steel and concrete are the main problems identified in the report. The two dams are scheduled to be ready by 2018, although experts see meeting that deadline as unlikely because of infighting between project managers and lingering questions about the integrity of engineering on the projects. The Isimba Dam deputy project manager has dismissed the findings as alarmist. Karuma dam project officials refused to comment on the specific issues of quality raised in the report.

Economic

<http://www.monitor.co.ug/News/National/Kiggundu-to-oversee-Karuma-dam-project/688334-3351798-e5bohiz/index.html>

<http://www.monitor.co.ug/News/National/Two-years-on--Only-30-per-cent-of-Karuma-Dam-works-complete/688334-3136042-oetnssz/index.html>

Customers

http://www.mondaytimes.co.ug/details.php?option=acat&a=1649#.WA2Fb_I97IU

<http://allafrica.com/stories/201602250230.html>

Community

<http://gmepa.com/unemployed-youths-storm-karuma-hydro-power-project-demanding-for-jobs/>

<https://www.internationalrivers.org/resources/uganda-s-dams-leave-affected-people-behind-8083>

Our people

<http://allafrica.com/stories/201604020212.html>

<http://www.theeastafrikan.co.ke/news/Uganda-energy-officials-trade-blame-over-Karuma-Isimba-dams/2558-3152542-c7f7ki/index.html>

Environment and heritage

http://www.nemaug.org/E_i_a_documents/Executive_summary.pdf

http://www.nemaug.org/E_i_a_documents/

<http://www.energyinftratech.com/Karuma.html>

<http://gmepa.com/chinese-expatriate-commits-suicide-at-karuma-hydro-power-projectgmepa-news/>

<http://www.theeastafrikan.co.ke/news/Uganda-energy-officials-trade-blame-over-Karuma-Isimba-dams/2558-3152542-c7f7ki/index.html>

Brand and reputation

<http://www.observer.ug/business/38-business/45689-chinese-firms-get-govt-support-over-new-karuma-isimba-suit>

<http://www.theeastafrican.co.ke/business/Building-of-Karuma-Isimba-dams-runs-into-another-legal-battle/2560-3203644-wqwcouz/index.html>

<http://www.theeastafrican.co.ke/news/EACJ-rules-against-Uganda-in-Karuma-dam-deal-/2558-3143536-lgfwz/index.html>

<http://www.uwasnet.org/Elgg/news/view/9362/uwasnet-reports-on-work-at-karuma-hydro-power-plant-at-the-joint-technical-review-meeting>

Summary against Entura's Sustainability Code

Table A.1: Summary of <project> screening against Entura's Sustainability Code

Principle	Elements	Summary of issue(s)	Risk* (L,M,H)	Mitigation	Residual risk ^A (L,M,H)
Governance	Ethics as per Entura's Integrity Framework Known legal proceedings	Not applicable			
Infrastructure and Resources	Solution being proposed meets safety requirements and is fit for purpose	Numerous technical issues associated with the project including cracking in the concrete spillways, use of poor quality materials and poor workmanship. Unless these issues are rectified the durability of the project could be compromised which may lead to safety issues.		Ensure all designs reviewed by Entura are fit for purpose and meet appropriate standards.	Medium
Economic	Ability to pay Project funding arrangements	The Project is funded by EXIM Bank and the Ugandan Government. Entura's Client is PowerChina Huadong	Low	NA	Low
Customers	Understand and value customers Provide innovative and sustainable solutions	The Project will enable Uganda to meet increasing electricity requirements and is expected to result in lower electricity tariffs.	Low	Where possible ensure design will be able to meet expected 600MW capacity and provide anticipated benefits.	Low
Community	Impact on communities (benefit) Human rights issues Level of community protest/outrage	The Project will result in displacement of 300 people from four villages. ESIA, ESMP and RAP have been prepared. Numerous reported social issues, many of which are ongoing, regarding land valuation, compensation and lack of consultation. Risk of ongoing community protest and legal challenge is considered high.		Entura's scope is confined to review of design drawings and liaison with Project parties. It offers limited scope to reduce community risk. Recommended to Huadong and Sinohydro a review of their social management plans, monitoring and processes for the project to help improve relationships with the local communities.	

<p>Our people</p>	<p>Safe work environment Company values aligned</p>	<p>Issues raised by Infratech regarding workplace OH&S. DFAT travel advisory 'exercise a high degree of caution' Tropical diseases including malaria</p>	<p>C Medium</p>	<p>Determine site safety with Richard Herweynen project contact Use Entura safety procedures including advice from Dynamiq</p>	<p>R Low</p>
<p>Environment and heritage</p>	<p>Impact on environment and heritage (environmental compliance performance)</p>	<p>Project located close to conservation areas and includes 12km diversion tunnel. ESIA completed with no significant environmental or heritage issues identified. Evidence of violation of National Environment Authority Guidelines and general poor project governance.</p>	<p>C Medium</p>	<p>Entura's scope is confined to review of design drawings and liaison with project parties and offers limited scope to reduce environmental and heritage risk. Where possible ensure that ESIA and ESMP commitments are incorporated into design drawings. Recommend to Huadong / Sinohydro a review of their environmental management plans, monitoring and processes for the project to help improve outcomes for the project.</p>	<p>R Medium</p>
<p>Brand and reputation</p>	<p>Political sensitivities, corporate behaviour/values, community perception etc</p>	<p>The Project has been subject to numerous protests and legal challenges associated with technical and governance issues. It has widespread local and regional negative media coverage. NGO attention is expected given issues to date and history with Bujagali Dam.</p>	<p>C Medium</p>	<p>Clearly define scope of work and expectations with PowerChina Huadong (i.e. what happens if we find their designs to be substandard?). Utilise suitably experienced and competent resources that are able to complete high quality reviews and defend findings to multiple technical and political stakeholders. Manage Entura's project exposure through engagement in small scopes of work. There is a potential to be caught in middle of a dispute over which we have no control (e.g. numerous reports lay blame for technical issues with Infratech based on statements made by Ministry despite evidence that they repeatedly warned Ministry of project issues but were ignored).</p>	<p>R Medium</p>
<p>Overall risk (based on highest residual risk rating)</p>					<p>R Medium</p>

* Ranking of risk based on Error! Reference source not found.

^ Ranking of residual risk based on Error! Reference source not found.

Approval

Requested by	Ajay Sharma
Prepared by	David Procter
Date	25 October 2016
Comments	Residual risk medium- high, due to potential for social and reputational issues which will be difficult to manage given Entura's involvement
Screening Delegate	Eleni Taylor-Wood
Date	26 October 2016
Comments	<p>Residual risk medium due to issues associated with construction workforce, local community relations and reputational concerns. Through being involved in smaller packages of work and reducing our exposure, reputational issues can be managed.</p> <p>Given Entura's involvement, it is difficult to manage potential workforce, social and environmental concerns associated with the project. We can, however, recommend to Huadong and Sinohydro that they undertake an independent review of their environmental and social management plans, monitoring and processes for the project to help improve outcomes for the project and reduce project related risks.</p>
Review	Amanda Ashworth
Date	10 November 2016
Comments	<p>Residual risk is rated as medium as per comments above. Country level assessment to be completed.</p> <p>Screening submitted to EMT</p>
Approval by	
Date	
Recommendation(s)	

Comments/Feedback/Response on issues raised

Date	Meeting/forum	Entura staff involved	Comments
17/11/2016	Site visit	Richard Herweynen Nick West	<p>Refer to attached email.</p> <p>On site safety appears to be adequate. Residual risk is already 'Low' so screening update not required.</p> <p>Potential issues associated with concrete cracking appear to be less serious than reported and may be driven by politics. Overall quality of project is expected to be fit for purpose. Residual risk is already 'Medium'</p>

			<p>so screening update not required.</p> <p>Environment observations e.g. minimal disturbance, fish passage etc consistent with finding from ESIA of no significant environmental impacts. 'Medium' risk rating based on reported lack of compliance with management plans. No further evidence of compliance observed.</p> <p>Community Issues have arisen from a combination of displacement, land acquisition / compensation Issues and the lack of employment opportunities for local people. Comments re displacement noted but consider 'High' risk rating still appropriate.</p>

Updates to screening

Revision ID	Principle	Revised summary of issue	Revised risk	Revised mitigation	Revised residual risk
1			Choose an item.		Choose an item.
2			Choose an item.		Choose an item.

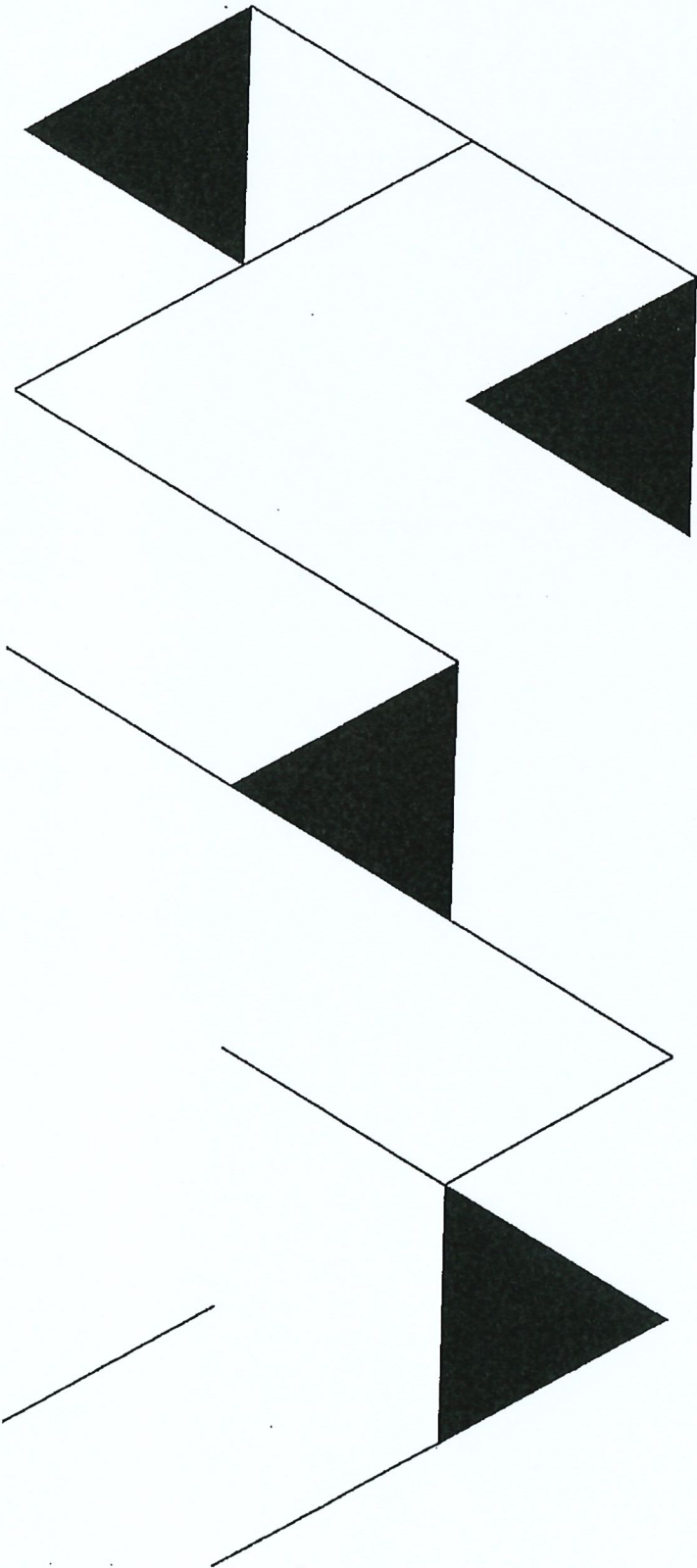
Revision approval

ID	Prepared by	Date	Comments	Approved by	Date	Comment
1						
2						

**SUSTAINABILITY
SCREENING PROCESS
New markets
(countries)**

November 2016

**WE OWN
WE OPERATE
WE CONSULT**



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Entura hold electrical contractors license number 1052448

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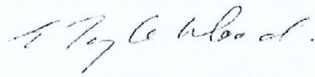
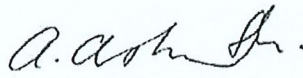
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Document information

Document title	Sustainability screening process New markets (countries)
Client organisation	Entura
Client contact	Entura Management Team (EMT)

Revision history

Revision 1

Revision description	Revision and update 2016		
Prepared by	Ajit Garg		3 November 2016
Reviewed by	Eleni Taylor-Wood		10 November 2016
	Amanda Ashworth		11 November 2016
Approved by	EMT (name)	(signature)	(date)

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A. Sustainability screening process for new markets (countries)

The country screening process includes assessment against the key principles of Entura's Sustainability Code. Criteria are provided under each principle to guide the risk assessment. Each criterion must be addressed and where issues are identified, detail provided. Based on the responses to the criteria and the relevant indices, an unmitigated risk level is determined using the definitions provided.

Once the assessment against each principle has been completed, a summary of the issues and the relevant unmitigated risk rating is included in the Summary against Entura's Sustainability Code. Where mitigation is possible to reduce the risk, this is also included and the residual risk level determined based on the definitions in Table 1.

Residual risk rating of sustainability criteria

The following matrix identifies the requirements that need to be met for the residual risk to be rated as low, medium or high.

Table A.1: Residual risk rating

Residual risk level	Initial risk
R-Low	Risk or issues identified can be managed with no ongoing adverse or negative impacts
R-Medium	Entura able to limit risks or issues to our operations through appropriate management measures/actions <i>and/or</i> Potential for ongoing adverse issues or negative impacts associated with working in the country
	Entura unable to significantly limit risks or issues to our operations through appropriate management measures/actions <i>and/or</i> Potential for significant, ongoing adverse issues or negative impacts associated with working in the country

Overall screening risk

The overall risk rating for the country screening is based on the highest residual risk rating.

As a guideline, it is expected that the overall risk rating would reflect the following.

Low risk

- Country has few sustainability issues, with most managed through national laws and regulations or all issues can be minimised through implementation of Entura's policies and procedures and by working to international standards and guidelines resulting in a low residual risk **and**

- Low likelihood of reputation issues for Entura should we choose to work in the country.

Medium risk

- Country has known sustainability issues, but many of these can be managed on Entura projects through implementation of Entura's policies and procedures and by working to international standards and guidelines **and**
- Likelihood of reputation issues for Entura should we choose to work in the country if potential issues not management.

High risk

- Country has known (and significant) sustainability issues **and**
- High likelihood of reputation issues for Entura should we choose to work in the country.

B. Guidance notes for screening and information sources

Worldwide Governance Indicators

World Bank's WGI reports governance indicators for 215 economies for six dimensions of governance: voice and accountability, political stability and absence of violence, government effectiveness, regulatory quality, rule of law and control of corruption. These indicators combine the views of a large number of enterprise, citizen and expert survey respondents in industrial and developing countries. They are based on over 30 individual data sources produced by a variety of survey institutes, think tanks, non-governmental organizations, international organizations, and private sector firms. For the purposes of this screening only the following indicators are used from the WGI country reports (use table tab):

- voice and accountability
- government effectiveness
- regulatory quality
- rule of law.

Note, if country is not ranked under the Transparency's Corruption Perceptions index, then also use control of corruption.

Political system

Department of Foreign Affairs and Trade (DFAT) country brief

Corruption and money laundering

Transparency International's Corruption Perceptions Index ranks countries/territories based on how corrupt a country's public sector is perceived to be. It is a composite index, drawing on corruption-related data from expert and business surveys carried out by a variety of independent and reputable institutions. Scores range from 0 (highly corrupt) to 100 (very clean).

Data in the table should be sorted in order of rankings (highest to lowest). Suggested countries for comparison against have been provided based on existing Entura markets. These can be changed as required to better reflect the region of interest.

Note, if country is not ranked under the Transparency's Corruption Perceptions index, then include World Bank's WGI - control of corruption under Table 1.

The Basel Institute on Governance Anti-Money Laundering (AML) Index was published for the first time in 2012 and has since then been the only non-profit organisation to create a research-based ranking focusing on the risk of money laundering and terrorist financing. The Basel AML Index provides the following key features:

- Overview of 152 countries according to their risk level in money laundering/terrorist financing
- Composite index based on public sources and third party assessments
- Independent research-based risk ranking which is updated annually.

Infrastructure and resources

Approach to power generation and infrastructure development to ensure reliability and safety.

Quality of infrastructure

World Economic Forum's- Global Competitiveness Report (*choose latest report*) includes Quality of Overall Infrastructure (such as transportation, electricity and telephone lines) as one of its indicators. This is a composite indicator that measures the overall level of infrastructure based on two perspectives: the infrastructure for transport and the infrastructure for electricity and telecommunication. The first perspective assesses the overall level and quality of road networks, air transport infrastructure and port infrastructure, while the second perspective assesses the quality of electricity supply and telecommunication infrastructure.

Indicators derived from the Survey are always expressed as scores on a 1–7 scale, with 1 = extremely underdeveloped/unreliable (among the worst in the world) and 7 = extensive and efficient/reliable (among the best in the world).

World Economic Forum - Global Competitiveness Report – 2nd pillar Infrastructure (e.g. for 2015/16)

Inclusive growth and development

The World Economic Forum - Benchmarking Inclusive Growth and Development (*choose latest report*) presents a preliminary Inclusive Growth and Development Benchmarking Framework that compares indicators of performance and enabling environment conditions in six principal policy domains (pillars) and fourteen subdomains (subpillars). Societies that have had success in building a robust middle class and reducing poverty and social marginalization have tended to create effective economic institutions and incentives in many of these areas at the same time that they have pursued efficiency enhancing reforms to boost growth. Since the essential measure of the inclusiveness of a society's growth model is the extent to which it produces broad gains in living standards before fiscal transfers are taken into account, the Benchmarking Framework places significant emphasis on policy and institutional factors that influence the composition of private sector activity and the distribution of outcomes within the market itself.

Pillar 6: Basic Services and Infrastructure considers basic Infrastructure and health-related services and infrastructure focusing on what extent a country provide its citizens with a core, common endowment of infrastructure and other basic services that enable productive engagement in the economy and provide often budget-relieving and quality-of-life enhancing contributions to their standard of living.

Economic

Credit risk	Moody's	Fitch	S&P
Low	Aaa – A3	AAA – A-	AAA – A-
Moderate	Baa1 – Ba3	BBB+ - BB-	BBB+ - BB-
High	B1 – Ca	B+ - D	B+ - C, R, S, D

Sortable Table Key	Moody's	Fitch	S&P
	Aaa	AAA	AAA
Very high grade credit	Aa1, Aa2, Aa3	AA+, AA, AA-	AA+, AA, AA-
High grade credit	A1, A2, A3	A+, A, A-	A+, A, A-
Good credit grade	Baa1, Baa2, Baa3, Baa4	BBB+, BBB, BBB-	BBB+, BBB, BBB-
Speculative grade credit	Ba1, Ba2, Ba3	BB+, BB, BB-	BB+, BB, BB-
	B1, B2, B3	B+, B, B-	B+, B, B-
	Caa1, Caa2, Caa3, Ca	CCC, CC, C, RD, D	CCC+, CCC, CCC-, CC, C, D

Fitch or Moodys Ratings for Country

Department of Foreign Affairs and Trade (DFAT) – Country/Economic fact sheets

Total external debt is debt owed to non-residents repayable in currency, goods, or services. Total external debt is the sum of public, publicly guaranteed, and private nonguaranteed long-term debt, use of IMF credit, and short-term debt.

Doing business in Country

The World Bank and International Finance Corporation prepare a report annually on the ease of doing business in economies across the globe. The report includes a ranking of countries by "ease of doing business" across a range of topics.

To develop the ranking, business regulations across the areas of starting a business, dealing with construction permits, registering property, getting credit, protecting minority investors, paying taxes, trading across borders, enforcing contracts and closing a business are assessed.

The distance to frontier (DTF) score shows how far on average an economy is at a point in time from the best performance achieved by any economy on each doing business indicator since 2005 or the third year in which data for the indicator were collected. The measure is normalized to range between 0 and 100, with 100 representing the frontier.

For the comparison table, data in the table should be sorted in order of rankings (highest to lowest). Suggested countries for comparison against have been provided based on existing Entura markets. These can be changed as required to better reflect the region of interest.

Rankings are rated as

- *Low risk* (DFT > 70): countries with good rules that allow efficient and transparent functioning of businesses and markets while protecting the public interest. These countries also tend to have a high regulatory quality.
- *Moderate* (50 ≤ DFT ≤ 70): Countries with more complicated rules and regulations resulting in greater inefficiencies and uncertainties for businesses and markets
- *High* (DFT < 50): those with poor or highly complicated rules and regulation resulting in inefficient and unclear functioning of businesses and markets.

Communities

Human rights

Freedom in the World evaluates the state of freedom in 195 countries and 15 territories. A country or territory is awarded 0 to 4 points for each of 10 political rights indicators and 15 civil liberties indicators. A score of 0 represents the smallest degree of freedom and 4 the greatest degree of freedom. The political rights questions are grouped into three subcategories: Electoral Process (3 questions), Political Pluralism and Participation (4), and Functioning of Government (3). The civil liberties questions are grouped into four subcategories: Freedom of Expression and Belief (4), Associational and Organizational Rights (3), Rule of Law (4), and Personal Autonomy and Individual Rights (4).

These scores are aggregated to determine two numerical ratings, for political rights and civil liberties, with a rating of 1 representing the most free conditions and 7 the least free. The average of a country's or territory's political rights and civil liberties ratings is called the Freedom Rating, and it is this figure that determines the status of Free (1.0 to 2.5), Partly Free (3.0 to 5.0), or Not Free (5.5 to 7.0).

Social progress

The Social Progress Index offers a framework for measuring the multiple dimensions of social progress, benchmarking success, and catalyzing greater human wellbeing. The first dimension, 'basic human needs', assesses how well a country provides for its people's essential needs by measuring access to nutrition and basic medical care, if they have access to safe drinking water, if they have access to adequate housing with basic utilities, and if society is safe and secure.

The second dimension, 'foundations of wellbeing' measures whether citizens have access to basic education, can access information and knowledge from both inside and outside their country, and if there are the conditions for living healthy lives. Foundations of wellbeing also measures a country's protection of its natural environment: air, water, and land, which are critical for current and future wellbeing.

The final dimension, 'opportunity', measures the degree to which a country's citizens have personal rights and freedoms and are able to make their own personal decisions as well as whether prejudices or hostilities within a society prohibit individuals from reaching their potential. Opportunity also includes the degree to which advanced forms of education are accessible to those in a country who wish to further their knowledge and skills, creating the potential for wide-ranging personal opportunity.

Social Progress Index scores are based on a 0 (worst) -100 (best) scale. This scale is determined by identifying the best and worst absolute global performance on each indicator recorded by any country since 2004

Safety

Department of Foreign Affairs and Trade (DFAT) [travel advice](#)

Environment

The Environmental Performance Index (EPI) ranks countries' performance on high-priority environmental issues in two areas: protection of human health and protection of ecosystems. The Environmental Performance Index (EPI) is constructed through the calculation and aggregation of more than 20 indicators reflecting national-level environmental data. These indicators are combined into nine issue categories, each of which fit under one of two overarching objectives.

Environmental Health and Ecosystem Vitality are the EPI's two main objectives that provide an umbrella for the Index's issue areas and indicators. Environmental Health measures the protection of human health from environmental harm. Ecosystem Vitality measures ecosystem protection and resource management. These two objectives are divided into nine issue categories that encompass high-priority environmental policy issues including Agriculture, Air Quality, Biodiversity and Habitat, Climate and Energy, Forests, Fisheries, Health Impacts, Water Resources, and Water and Sanitation.

The two objectives, Environmental Health and Ecosystem Vitality, are weighted equally to achieve a single value, the EPI score, for each country.

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C. Sustainability screening of Uganda

Language	English and Swahili
Population	39 660 151 (As of 1 January 2016)
Income category (from World Bank)	Low Income

Governance

Political system

- What is the country's political system, how mature is it and is it stable?

Achieved independence from UK in October 1962. Uganda's myriad of ethnic groups, each with their own political system and culture, stymied attempts to create a cohesive and functioning polity. A dark period of history followed under dictatorial regimes of Idi Amin (1971-79); who was responsible for the deaths of 300,000 people, and the dictatorship of President Obote (1980-85), who was responsible for the killing of 100,000 people. Following a coup in 1986, Yoweri K Museveni came to power. In 2005, Museveni removed term limits and in 2011 he was elected to his position for a fourth term, gaining 68 per cent of the vote. . Following elections in February 2016, Museveni has assumed the Presidency for a fifth term in office.

- Is there evidence of a fully functioning legal system, including social, environmental and safety legislation and a corporate and civil law system? Please provide detail.

The 1995 Constitution established Uganda as a republic with an executive, legislative, and judicial branch. Uganda's legal system is based on English Common Law and African customary law. However, customary law is in effect only when it does not conflict with statutory law. The laws applicable in Uganda are statutory law, common law; doctrines of equity and customary law are applicable in Uganda. These laws are stipulated by the Judicature Act.

The legal sector in Uganda comprises of various institutions concerned with the provision of legal services, the administration of Justice and the enforcement of legal instruments or orders. The main institutions as established by the Uganda Constitution of 1995 include the Ministry of Justice and Constitutional Affairs, the Judiciary, the Parliament, the Uganda Police Force, the Uganda Law Reform Commission, the Uganda Human Rights Commission.

The general the structure of Uganda's legal sector appears as follows:

- Ministry of Justice and Constitutional Affairs
- The Judiciary
- Judicial Service Commission
- The Law Reform Commission
- The Electoral Commission
- The Uganda Land Commission
- Uganda Registration Services Bureau
- Uganda Human Rights Commission
- Kampala City Council
- The Law Council
- The Law Development Centre

The Judiciary is entrusted to administer justice through courts of judicature including the Supreme Court, the Court of Appeal, the High Court and other courts or tribunals established by Parliament. The highest court in Uganda is the Supreme Court. The Court of Appeal is next in hierarchy and it handles appeals from the High Court but it also sits as the Constitutional Court in determining

matters that require Constitutional interpretation. The High Court of Uganda has unlimited original jurisdiction.

Between 1991 to 1994 the Government of Uganda developed a National Environment Action Plan (NEAP). The NEAP provided a framework for addressing gaps in environment management as well as a strategy for integrating environment into the national socio-economic development. One of the outcomes of the NEAP was the formulation of the National Environment Management Policy (NEMP) of 1994. More details here: <http://www.lead-journal.org/content/07020.pdf>

In accordance with section 13 of Occupational Safety and Health Act, 2006, it is obligatory for an employer to ensure health, safety and welfare of persons at workplace., which sets out detailed legislation on terms of employment, including hours of work, leave, termination of employment and workplace safety for the private sector (<http://mywage.ug/home/labour-laws/health-safety-at-work>)

- Are there known risks associated with corruption and money laundering? If so how are they being managed?

Corruption in Uganda is widespread and seen as one of the greatest obstacles to the country's economic development as well as to the provision of quality public services. Such corruption challenges are exacerbated by weak law enforcement, which fuels a culture of impunity, particularly with regards to high-ranking officials involved in corruption schemes. A new National Anti-Corruption Strategy (NACS) was launched in 2008. Other measures taken by the Government include the new Anti-Corruption Act in 2009, the 2007 declaration signed by Ugandan, Kenyan and Tanzanian anticorruption authorities to deny safe haven to corrupt persons and investment in illicit funds (World Bank, 2011), and the establishment of specialised anticorruption court within the judiciary.

Worldwide governance indicators

Table C.1: Worldwide Governance Indicators (WGI; source World Bank)

Indicator	Definition	Country	2015 Percentile Rank (0-100)*
Voice and Accountability	The extent to which a country's citizens are able to participate in selecting their government, as well as freedom of expression, freedom of association, and a free media.	Uganda	29.1
		Australia	93.1
		Fiji	48.8
		India	60.6
		Indonesia	52.2
		Malaysia	36.5
		Nepal	33.5
		Papua New Guinea	49.3
		South Africa	69.0
Government effectiveness	The quality of public services, the quality of the civil service and the degree of its independence from political pressures, the quality of policy formulation and implementation, and the credibility of the government's commitment to such policies.	Uganda	37
		Australia	92.3
		Fiji	43.3
		India	56.3
		Indonesia	46.2
		Malaysia	76.9
		Nepal	13.5
		Papua New Guinea	29.8
		South Africa	64.9

Indicator	Definition	Country	2015 Percentile Rank (0-100)*
Regulatory quality	The ability of the government to formulate and implement sound policies and regulations that permit and promote private sector development.	Uganda	46.2
		Australia	96.6
		Fiji	40.4
		India	39.9
		Indonesia	47.1
		Malaysia	74.5
		Nepal	25.0
		Papua New Guinea	31.3
		South Africa	63.9
Rule of law	The extent to which agents have confidence in and abide by the rules of society, and in particular the quality of contract enforcement, property rights, the police, and the courts, as well as the likelihood of crime and violence.	Uganda	43.3
		Australia	94.2
		Fiji	38.9
		India	55.8
		Indonesia	39.9
		Malaysia	71.6
		Nepal	26.9
		Papua New Guinea	18.8
		South Africa	59.1

* Indicates rank of country among all countries in the world. 0 corresponds to the lowest rank and 100 to the highest

Corruption index

Table C.2: Comparison of Uganda (2015) Corruption Perception Index against other countries in which Entura works (source Transparency International)

Country	Corruption Perceptions Index	
	Rank	Score
Uganda	139	25
Australia	13	79
Fiji	-	-
India	76	38
Indonesia	88	36
Malaysia	54	50
Nepal	130	27
Papua New Guinea	139	25
South Africa	61	44

Scores range from 0 (highly corrupt) to 100 (very clean).

Anti-money laundering (AML) index

Table C.3: Comparison of Uganda (2016) AML Index against other countries in which Entura works (source Basel Institute on Governance)

Country	AML Index	
	Rank	Score
Uganda	4	8.01
Australia	106	4.99
Fiji	-	-
India	78	5.69
Indonesia	57	6.23

Country	AML Index	
	Rank	Score
Malaysia	87	5.46
Nepal	12	7.57
Papua New Guinea	62	6.11
South Africa	117	4.86

Scores range from 0 (low risk) to 10 (high risk).

Risk rating

Unmitigated risk rating

C-Low	<p>Well developed, stable and effective legal and democratic political system, with corruption and money laundering actively managed and discouraged <i>and</i></p> <p>Worldwide governance indicators show country is in the upper percentiles (i.e. percentile >75) <i>and</i></p> <p>Perception of corruption is low (corruption perception index score > 70) <i>and</i></p> <p>AML index is low (score ≤ 5)</p>
C-Medium	<p>Less mature legal and political system (including stable authoritarian political systems). Corruption and money laundering known to occur, but government taking active steps to manage this issues <i>and</i></p> <p>Worldwide governance indicators show country is in the medium percentiles (i.e. percentile between 25-75)</p> <p><i>or</i></p> <p>Perception of corruption is moderate (corruption perception index score between 30-70)</p> <p><i>or</i></p> <p>AML index is moderate (score between 5 and 8)</p>
C-High	<p>Poor/ineffective, repressive and/or unstable legal and political system, corruption and money laundering common with little control shown by the government <i>and</i></p> <p>Worldwide governance indicators show country is in the lower percentiles (i.e. percentile <25)</p> <p><i>or</i></p> <p>Perception of corruption is high (corruption perception index score <30)</p> <p><i>or</i></p> <p>AML index is low (score ≥ 8)</p>

Assets and water resources

- Does the country have any requirements (legislation, standards, guidelines) related to safety in design to ensure that energy generation and infrastructure development projects are reliable and safe?

The Uganda National Bureau of Standards (UNBS) is a statutory body under the Ministry of Trade, Industry and Co-operatives established by the UNBS Act Cap 327 and became operational in 1989. It is governed by the National Standards Council and headed by the Executive Director who is responsible for the day-to-day operation of UNBS.

The Mandate of UNBS is:

- Formulation and promotion of the use of standards;
- Enforcing standards in protection of public health and safety and the environment against dangerous and sub-standard products;
- Ensuring fairness in trade and precision in industry through reliable measurement systems; and
- Strengthening the economy of Uganda by assuring the quality of locally manufactured products

to enhance the competitiveness of exports in regional and international markets.

Uganda also have standards relating to road construction, seismic testing. Major infrastructure projects have been funded using international funding that requires designs to international standards.

Quality of infrastructure index

Table C.4: - Global Competitiveness Report (GCR) - Infrastructure related indices (source World Economic Forum)

Indicator	Ranking (/140)	Score(/7)
GCR 2nd pillar: Infrastructure	128	2.4
A. Transport infrastructure	121	2.5
Quality of overall infrastructure	95	3.5
B. Electricity and telephony infrastructure	125	2.2
Quality of electricity supply	111	3.1

Scores range from 1: extremely underdeveloped/unreliable (among the worst in the world) to 7: extensive and efficient/reliable (among the best in the world)

Risk rating

Unmitigated risk rating

C-Low	Country has safety in design requirement similar to that applied by Entura <i>or</i> Country applies international standards around safety in design to energy and water infrastructure projects <i>and</i> GRC infrastructure related indices >4.5
C-Medium	Country has limited requirements around safety in design <i>or</i> Country standards around safety in design for energy and water infrastructure projects lower than internationally accepted standards <i>or</i> GRC infrastructure related indices between 2.5-4.5
	Country has no requirements around safety in design <i>or</i> GRC infrastructure related indices <2.5

Economic

- How mature and stable is the economy?

In the past nine months, the economy has witnessed some instability and volatility arising from a number of factors: the staging of a national election, a slowing and volatile global economy, and the subsequent declining commodity prices resulting from slower growth in two large economies, China and Brazil. With these developments, the shilling lost value steeply, reaching an annual depreciation rate of 40% by September 2015-unprecedented since the liberalization of the foreign exchange market. Inflation also edged up to 8.5%, with firm expectation among economic players that it would increase due to the heavy depreciation of the currency, on top of other factors.

The Central Bank responded by pursuing a tighter monetary policy stance, that succeeded in withdrawing money from circulation, signalling a tighter monetary policy. As a result, the price of treasury bills went up, constraining the government borrowing and spending on its planned

investments while the cost of borrowing from banks increased for the private sector.

Overall, the economy is estimated to have grown by 4.5 to 5% during the current financial year 2015/16. This growth rate is much lower than 5.4% that was anticipated in the previous update. Significantly, this is almost more than a percentage point lower than the government's original projection. The take-off of Karuma and Isimba dams helped sustain economic activity in spite of the weak economic environment and the below-par performance of some of the government's other planned investments. The biggest explanation for the slower economic growth was the impact of macro volatility on the private sector activity. Uganda continues to trail other East Africa countries; in particular, Rwanda and Tanzania are forecast to have grown at 7%, while Kenya is at 6% during this year.

- What is the state of the country's cash flow and liquidity?

Endowed with significant natural resources, including ample fertile land, regular rainfall, and mineral deposits, it is thought that Uganda could feed all of Africa if it were commercially farmed.

The economy of Uganda has great potential, and it appeared poised for rapid economic growth and development. Source: https://en.wikipedia.org/wiki/Economy_of_Uganda

The banking industry in Uganda remains resilient to shocks with adequate capital and liquidity buffers. The key Financial Soundness Indicators show that Bank of Uganda's performance improved in the year to December 2015, compared to the year to December 2014. During 2015, Bank of Uganda instituted several regulatory reforms aimed at improving the soundness of the financial system.

Table C.5: Economic indicators (source: DFAT and World Bank)

Economic indicators	2016
GDP (US\$b) (current prices)*	25.0
GDP per capita (US\$)*	608.4
Real GDP growth (% change yoy)*	5.3
External debt stocks (% of GNI)^	
Inflation (% change yoy)*	6.7
Unemployment (% labour force)*	na

*DFAT; ^World Bank

Sovereign risk indices

Table C.6: Sovereign risk rating (source: CountryEconomy.com)

Moody's	S&P	Fitch
B1	B	B+

Risk rating

Unmitigated risk rating

G-Low	Country with mature market economy open to foreign and domestic investors. Country does not have cash flow or liquidity issues <i>and</i> Low credit risk based on lowest of the three sovereign risk ratings
C-Medium	Country with emerging market economy, with some cash flow and or liquidity issues <i>or</i> Moderate credit risk based on lowest of the three sovereign risk ratings
C-High	Country with poor economic outlook and unclear or no economic program and limited foreign investment. Country has known and ongoing cash flow and liquidity issues. <i>or</i> High credit risk based on lowest of the three sovereign risk ratings

Customers

- What are the taxation requirements for companies working in the country?

A corporate tax is levied on companies, partnerships and sole proprietorships. Any income arising out of any trade, profession, vocation or adventure in the nature of trade is taxable under special rules applicable to business entities unless otherwise specified as being exempt under the tax code.

The income of all companies accruing or derived from Uganda is taxable. A company is liable to pay tax separately from its shareholders. The sources of a company's income on which tax can be levied include profits and gains from any business carried on for whatever period of time. Other sources include dividends from shares in other companies and interest from the use of the company's property. The income tax rates are; Resident and Non Resident Companies - 30%, Branch tax - 30%, Branch profit Remittance tax - 15%. For more details <https://www.hg.org/article.asp?id=28691>

- Is the country covered by Entura's insurance policies? If not, what is covered

Need to notify our insurers of any trip, dates, and purpose prior to any further work in the country. Also any additional relevant information i.e. contract terms and conditions, security arrangements, potential site visits.

- Are there any international business trade restrictions, bans, export controls or sanctions associated with the country (e.g. DFAT sanctions)?

Australia and Uganda have good trade relations, with both countries hosting embassies for each other.

No restrictions are in place.

Doing business in country index

Table C.7: Doing Business topic rankings for Uganda in 2017 (source: World Bank)

Topics	Ranking (/189)	Distance to frontier (DTF) score (% points)*
Overall	115	57.77
Starting a Business	165	71.30
Dealing with Construction Permits	151	57.19
Getting Electricity	161	44.78

Topics	Ranking (/189)	Distance to frontier (DTF) score (% points)*
Registering Property	116	55.81
Getting Credit	44	65.00
Protecting Investors	106	50.00
Paying Taxes	75	74.71
Trading Across Borders	136	58.90
Enforcing Contracts	64	60.60
Resolving Insolvency	111	39.40

* DFT rankings are rated as low risk (DTF > 70), moderate (50 ≤ DTF ≤ 70) and high (DTF < 50):

Table C.8: Comparison of Uganda 2016 rating with other countries in which Entura works (source: World Bank)

Country	Doing Business ranking (/189)	Distance to frontier (DTF) score (% points)
Uganda	122	56.64
Australia	13	80.08
Fiji	88	62.58
India	130	54.68
Indonesia	109	58.12
Malaysia	18	79.13
Nepal	99	60.41
Papua New Guinea	145	50.74
South Africa	73	64.89

Risk rating

Unmitigated risk rating: **C-Medium**

C-Low	Country with rules and regulations that allow efficient and transparent functioning of businesses and markets. Country has no international business trade restrictions, bans, export controls or sanctions or has them but they are not relevant to Entura. <i>and</i> Worldwide governance indicators indicate country is in the upper percentiles (i.e. percentile >75) <i>and</i> Doing business rating is high (DTF > 70)
C-Medium	Countries with more complicated rules and regulations resulting in greater inefficiencies and uncertainties for businesses and markets. <i>or</i> Entura insurances do not currently allow work in the country but can be obtained <i>or</i> Doing business rating is moderate (30 < DTF < 70)
C-High	Country with poor rules and regulations that results in inefficient and unclear functioning of businesses and markets. Country has international business trade restrictions, bans, export controls or sanctions that prohibit Entura from working with/in the country. <i>or</i> Entura insurance does not allow work in the country and/or premiums to obtain insurance consider high compared to potential revenue value <i>or</i> Doing business rating is low (DTF < 30)

Community

- What is the country's approach to human rights, especially in regards to infrastructure projects? Who are the most vulnerable and/or the likely victims of human rights abuse? Whose rights should we be worried about (local staff, expats, local communities, migrant workers)? Who are the most likely perpetrators of abuse?

Concerns exist about violations of freedom of association, assembly, and expression continued during and after Uganda's February 2016 elections. President Yoweri Museveni, who has been in power since 1986, was declared the winner, giving him another five year term. Opposition presidential candidates faced arrest, detention, and obstructions. Police blocked some candidates' access to media and public meetings. Police arrested and beat journalists attempting to report on the house arrest for over a month of opposition leader Dr. Kizza Besigye. A new nongovernmental organizations law includes vague "special obligations" of independent groups – provisions that could make organizations vulnerable to politically motivated charges. Although the Anti-Homosexuality Act was overturned by a constitutional challenge in 2014, government officials continue to voice their support for it.

Source:- <https://www.hrw.org/africa/uganda>

- Does the country have any requirements (legislation, standards, guidelines) related to human rights and social issues to ensure that energy generation and infrastructure projects are developed and operated in a sustainable way? Is there a gap between local law and international law standards? Is local law effectively enforced?

Uganda experiences difficulties in the achievement of international standards of human rights for all citizens. These difficulties centre upon the provision of proper sanitation facilities, internal displacement and development of adequate infrastructure

Human rights index

Table C.9: State of freedom in Uganda (2016) (source: Freedom House)

Indicator	Year
Political rights*	6
Civil liberties*	5
Aggregate score (/100)^	36
Freedom rating*	5.5
Freedom status	Not Free

* 1 represents the most free and 7 the least free

^ 0 indicates least free, 100 most free

Table C.10: Comparison of Uganda (2016) rating with other countries in which Entura works (source: Freedom House)

Country	Aggregate score^	Freedom rating*	Freedom status
Uganda	36	5.5	Not free
Australia	98	1	free
Fiji	62	3	Partly free
India	77	2.5	free
Indonesia	65	3	Partly Free
Malaysia	45	4	Partly Free
Nepal	51	3.5	Partly Free
Papua New Guinea	59	3.5	Partly Free
South Africa	79	2	Free

Our people

Safety

- What is the DFAT travel safety rating and advice for the country? Please summarise

Exercise a high degree of caution.

High level of risk within 50km of the border with the Democratic Republic, Karamoja Region and within 50km of the border with South Sudan.

If travel is require then should typically seek professional security advice.

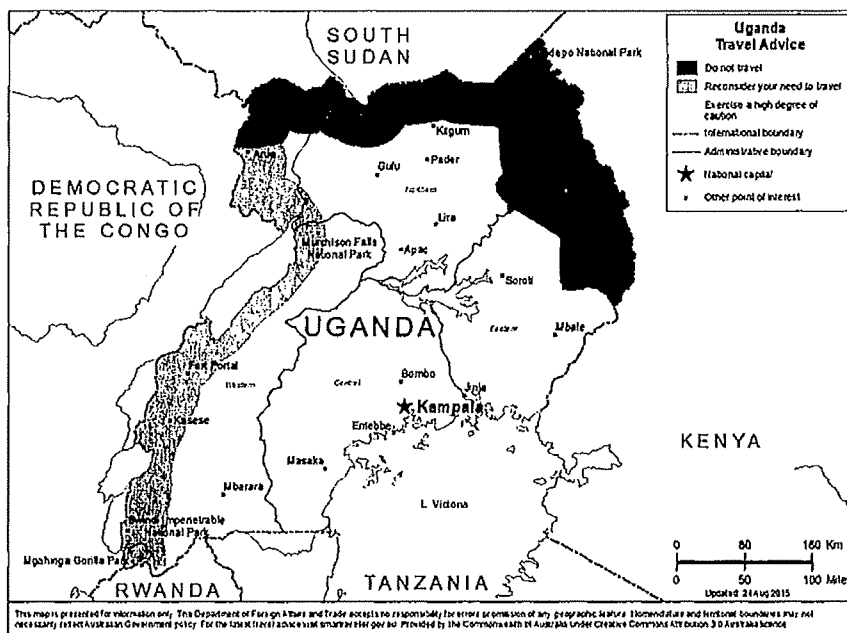


Figure C.1: DFAT travel advice map

- What is the risk of political unrest, crime or terrorist attacks

There is a constant threat of terrorist attack in the region. There was attack on the Westgate shopping centre in Nairobi, Kenya, which killed 67 people, on 21 September 2013.

In July 2014, there were violent attacks against security installations and civilians in Bundibugyo, Kasese, and Ntoroko districts in western Uganda near the border with DRC. Over 90 people were reported killed.

Violent protests can occur in Kampala and other parts of Uganda. Clashes between tribal groups in Karamoja region have occurred. Within 50 km of the border with South Sudan has serious risk of banditry and crime in these areas. The Lord's Resistance Army (LRA) is no longer active in Uganda but continues to operate in neighbouring Democratic Republic of the Congo (DRC) and Central African Republic. The LRA is believed to have been responsible for several attacks that killed or wounded foreign aid workers in the past. Further attacks could occur.

Petty crime such as pickpocketing and bag snatching can occur, especially on public transport. There is a risk of armed robbery and carjacking, residential burglaries, financial scams, Bogus

internet friendship, dating and marriage schemes, kidnapping, assault and robbery.

- What is the risk of from natural disasters such as earthquakes, cyclones, floods etc.

The rainy seasons are from March to May and October to November when flooding may occur, causing landslides, displacing large numbers of people and blocking some roads. Uganda is located in an active earthquake region.

Industrial relations

- Does the country have legislation or standards around workplace health and safety? How do these compare to international standards?

In accordance with section 13 of Occupational Safety and Health Act, 2006, it is obligatory for an employer to ensure health, safety and welfare of persons at workplace., which sets out detailed legislation on terms of employment, including hours of work, leave, termination of employment and workplace safety for the private sector (<http://mywage.ug/home/labour-laws/health-safety-at-work>)

Risk rating

Unmitigated risk rating	C-Medium
-------------------------	----------

C-Low	Secure country with minimal safety risks <i>and</i> DFAT travel rating is <i>exercise normal safety precautions</i> or <i>exercise a high degree of caution</i>
C-Medium	Country likely to have relatively serious crime or security problems, but these are not targeted at foreign companies <i>or</i> DFAT travel rating is <i>reconsider your need to travel</i> <i>or</i> DFAT travel rating is <i>do not travel</i> in some zones that need consideration in connection with likely project sites
C-High	Country has major crime or security problems, and these may target expats or foreign companies <i>or</i> DFAT travel rating for the entire country is <i>do not travel</i>

Environment and heritage

- What is the country's approach to environmental and heritage management, especially in regards to infrastructure projects?

Environmental and land degradation is becoming ever more visible as crop cultivation spreads and grazing becomes more concentrated, especially around larger water sources such as valley tanks and dams. The quality of the soil is also being impoverished, following repeated cultivation using tractors and ox-ploughs, which exposes it to the risk of increased surface run-off and soil erosion, after torrential rains and flash floods.

Enforcement of existing environmental policies regarding natural resources by the mandated authorities and local government is weak, as the Environmental Protection Police Force has no presence in Karamoja.

Source:

http://www.undp.org/content/dam/uganda/docs/UNDPUG2015_UgandaHDR2015.pdf?download

The livelihoods of most Ugandans intimately depend on the environment, both as a source of subsistence and as a basis for production. Environmental degradation in the country—which includes wetland encroachment and contamination of water resources—is critical.

Source: <http://www.bioone.org/doi/pdf/10.1659/mrd.1092>

- Does the country have any requirements (legislation, standards, guidelines) related to environmental and heritage management to ensure that energy generation and infrastructure projects are developed and operated in a sustainable way? Is there a gap between local law and international law standards? Is local law effectively enforced?

The basis for environmental regulation in Uganda is well established. It could benefit from more funding to the environment sector to facilitate environment management activities including law enforcement and public awareness, information and training programmes. There is also need to: create and strengthen partnerships at community, local, national, regional and international levels; step up efforts in ensuring compliance with environmental law; continue effective restoration of degraded ecosystems; and provide effective checks and balances to harmonize development objectives, poverty alleviation and conservation interests for well-informed trade-offs. Source: <http://www.lead-journal.org/content/07020.pdf>

Environmental performance index

Table 0.1: Comparison of Uganda's 20 environmental performance with other countries in which Entura works (source: Freedom House)

Country	Score (/100)	10 year change (%)	Rank (/180)^
Uganda	57.56	22.13	135
Australia	87.22	21.75	13
Fiji	75.29	23.22	59
India	53.58	20.87	141
Indonesia	65.85	10.45	107
Malaysia	74.23	13.05	63
Nepal	50.21	14.53	149
Papua New Guinea	48.02	15.93	156
South Africa	70.52	15.19	81

* 100 represents the best performer and 0 the worst

^ 1 is highest performing country, 180 lowest

Risk rating

Unmitigated risk rating: **C-Medium**

G-Low	Country has a good environmental and heritage management record and has laws and regulation around the environmental assessment and management <i>and</i> Environmental performance score > 80
G-Medium	While the country has laws and regulations around environmental and heritage protection poor implementation can lead to environmental or heritage issues. <i>or</i> Environmental performance score 50 < 80
	Country has a poor environmental and heritage management record with weak laws and regulations and/or poor implementation of laws and regulations around environmental and heritage protection. <i>or</i> Environmental performance score < 50

<https://freedomhouse.org/report/freedom-world/2016/uganda>

Our people

<http://dfat.gov.au/geo/uganda/Pages/uganda.aspx>

Environment and heritage

<http://epi.yale.edu/country-rankings>

Brand and reputation

<https://freedomhouse.org/report/freedom-world/2016/uganda>

Summary against Entura’s Sustainability Code

Table 0.2: Summary of <country> screening against Entura’s Sustainability Code

Principle	Elements	Summary of issue(s)	Risk (L,M,H)	Mitigation	Residual risk [^] (L,M,H)
Governance	Political system Corruption potential Legislative requirements	Evidence of Violent protest. Potential corruption and bribery issues.		Monitoring the potential for corruption issues throughout all projects, especially when interacting with the public sector Normal procedures for engaging with clients including sustainability screening and checking for bribery/corruption. Provide cultural and awareness training for anyone going in country, in particular around bribery and freedom of speech Work within Entura’s Integrity Framework and our Code of Ethical Behaviours and avoid the potential for corruption. Ensure all contracts are reviewed by Hydro Tasmania Legal Department and that we work always work within the contract	R=Low
Assets and water Resources	Approach to energy generation and infrastructure development to ensure reliability and safety	Infrastructure developments rank above average. Tend to design to international standards (US and British)		By working within Entura SiD requirements and to international standards, issues associated with infrastructure design should be avoided (unless they are not implemented during the construction phase)	R=Low

<p>Economic</p>	<p>Economy (GDP/country rating) Sovereign risk</p>	<p>Economy is very low and weak.</p>	<p>Monitor Uganda's Fitch and Moody's ratings. Work with organisations that are known to have financial stability and a good credit rating</p>	<p>R-Low</p>
<p>Customers</p>	<p>Ease of doing business in country</p>	<p>No trade restriction with Australia, need to notify HT insurers of any planned trips and length</p>	<p>Provide details of any planned trips to HT insurers Checks on requirements for doing business in Uganda. Comply with tax requirements and monitor for any changes in requirements. Work within our Code of Ethical Behaviours and avoid the potential for corruption Allow additional time within projects to manage potential issues Ensure all contracts are reviewed by Hydro Tasmania Legal Department and that we work always work within the contract</p>	<p>R-Low</p>
<p>Community</p>	<p>Country approach to human rights management</p>	<p>Evidence of oppression within the country and a poor ranking in freedom. Improvements indicated in the social progress rankings.</p>	<p>Ensure that human rights issues associated with a project are managed in accordance with international standards such as World Bank's Performance Standards Undertaken company and project screenings prior to commencing work to evaluate potential issues and risks</p>	<p>R-Medium</p>

<p>Our people</p>	<p>Safe work environment Country safety rating Risk of natural disasters</p>	<p>Terrorist risk and violence in the region, DFAT rating for proposed project is to exercise a high degree of caution, other areas of the country are ranked higher Application of safe work practices may vary between companies.</p>	<p>C-Medium</p>	<p>R-Low</p>
<p>Environment and heritage</p>	<p>Country approach to environmental management</p>	<p>Has environmental legislation but not well managed or policed</p>	<p>C-Medium</p>	<p>R-Low</p>

<p>Brand and reputation</p>	<p>Political sensitivities, corruption, human right issues etc.</p>	<p>Bribery and human rights are highlighted as potential issues that could affect our brand.</p>	<p>Undertaken company and project screenings prior to commencing work to evaluate potential issues and risks. Provide cultural awareness training for anyone going in country. Monitor management of environmental, social and safety issues</p>	<p>R-Medium</p>
<p>Overall risk (based on highest residual risk rating)</p>				<p>R-Medium</p>

^ Ranking of residual risk based on Table A.1

Approval

Requested by	Ajay Sharma
Prepared by	Sunita Pant
Date	4/11/16
Comments	
Screening Delegate	Eleni Taylor-Wood
Date	10/11/16
Comments	Uganda has a poor record of human rights management .Potential for reputational issues if there is poor management of social and human rights issues associated with a project. Such issues may be difficult to manage on a project where Entura is not responsible for management of social (or environmental or safety) issues.
Review	Amanda Ashworth
Date	11/11/16
Comments	Rated as medium risk and submitted for EMT approval. Client and project specific screenings required for all future work and should consider mitigations noted in this Report. Note requirements re notifications for insurance purposes.
Approval by	EMT
Date	
Recommendation(s)	

Comments/Feedback/Response on issues raised

Date	Meeting/forum	Entura staff involved	Comments
	<type of discussion, phone call, email, meeting etc>		

Updates to screening

Revision ID	Principle	Revised summary of issue	Revised risk	Revised mitigation	Revised residual risk
1			Choose an item.		Choose an item.
2			Choose an item.		Choose an item.

Revision approval

ID	Prepared by	Date	Comments	Approved by	Date	Comment
1						
2						

Laura Harle

Subject: FW: Sustainability Screening for Karuma - Update

From: Richard Herweynen
Sent: Tuesday, 15 November 2016 10:46 PM
To: Nick West; James Mason
Cc: Tammy Chu
Subject: RE: Sustainability Screening for Karuma - Update

James:

That should be 2 (g) not 2 (k) where I had written 9m rather than 9km ☺

Richard Herweynen | Principal Consultant - Civil
MEngSc, BE Civil (Hon), GradDipMgt, MIEAust, CPEng, NPER, RPEQ

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From: Nick West
Sent: Tuesday, 15 November 2016 10:06 PM
To: James Mason
Cc: Tammy Chu; Richard Herweynen
Subject: RE: Sustainability Screening for Karuma - Update

James,

One point on Richard's email: at point 2.k, the length of the diverted river is 9km.

Nick West | Senior Civil Engineer
BE (Civil) (Hons), MBA (Technology Management)
MIEAust CPEng

 **entura** | The power of
Hydro Tasmania | natural thinking

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WE OWN. WE OPERATE. WE CONSULT.

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From: Richard Herweynen
Sent: Tuesday, 15 November 2016 9:48 PM
To: James Mason
Cc: Tammy Chu; Nick West
Subject: Sustainability Screening for Karuma - Update
Importance: High

James:

The following is a summary of our impressions from the risks listed in the sustainability screening of Karuma Hydropower Project.

1. General Safety in Uganda in the area of the project. Based on our observations the country seems to be safe, people friendly, and no obvious safety concerns. Having said that the construction camp is a secure compound with guards at each of the main gates. At night people do not go out of the compound and they say this is for safety reasons. Also they have had an incident of a Chinese going exploring down at the river in the evening and finished up being killed by a hippo – so this is also a reason they prefer people not to leave the secure compound in the evenings.
2. Project Risk Ratings:-
 - a. I think medium is probably ok, although this could be low, for the project affected communities and livelihood, as there is significant employment generated from the project and the project has targets for providing employment to the local population.
 - b. I am surprised by the High rating for resettlement. I know some villages were resettled due to the construction activities. But there is no resettlement from flooding due to large dam, as the dam is very low and the project is a run of river project.
 - c. Stakeholder engagement – I don't know exactly what you are measuring here. But project is on the Nile River and therefore there would be interested stakeholders. Due to cracks on the dam and intake structure the project has gained higher political scrutiny due to concerns about quality. However, I think once the concrete mix has been sorted, this will settle down and improve.
 - d. Labour and working conditions – safety gear is worn on site, and it seems that normal expected safety practices for things like blasting are being used, there are barriers at edge of excavations – they may not be exactly what we are used to but at least the edge is defined and some barrier is present. Dust masks were given to us when we went underground. I would say that it is similar to what I observed at Murum in Sarawak.
 - e. Cultural heritage – I have no idea!
 - f. Public health – the Chinese do promote a safety culture, I know they have malaria medication of site, there is a medical clinic just outside the camp compound, bottled water is fully available, food causing stomach issues does not appear to be a problem. But we have not tested the system, as we have both stayed well and safe.
 - g. Biodiversity and invasive species, land clearance – land clearance is minimal as there is no large storage and most of the engineering components are underground. There are some large stockpiles from the tunnel spoil, some of this will be used for concrete aggregate but there will be a significant stockpiles left at the end and I am not sure what will happen with these areas. In terms of the design and operation – there is a fish ladder on the low dam, so this should create opportunity for fish passage; and there is a requirement to release 100 m³/s of ecological flow at the dam site to provide some environmental flow from the dam to the tailrace tunnel outfall (approximately 9m length of river).

- h. Erosion and sedimentation – I don't think this is a significant issue, although I do not see evidence of sediment management on site during construction. But then again most of the works are underground.
 - i. Water quality – I have not seen the environmental management plan so I cannot really comment on this. But again most works are underground and therefore not a direct route from works to the river. Also river seems ok, and people continue to fish immediately downstream of the dam.
 - j. Waste, noise and/or air quality – waste appears to be managed on site, noise does not seem bad, probably because again most of the work is underground. The main noise is blasting, which seems to only happen about once or twice a day now at similar times.
 - k. Downstream flows – I do not think this is a High risk, it should be reduced to at least Medium. It is a run of river project, during construction the river keeps flowing past the dam through a diversion channel. There is a 100 m³/s ecological flow that will be constantly released between the dam and the tailrace outflow (approx.. 9km). Beyond the tailrace outflow there is no impact on flow conditions.
 - l. Land acquisition – I cannot see this being a high risk either and should be reduced to Medium. There is no large flooded area from the dam, most of the infrastructure is underground, and the only real impact is the construction camp, workshops, batching area, etc – but this is not that large an area.
3. Assets and water resources – yes there are some technical issues on site but I do not agree that the quality is bad. They have some significant thermal crack issues on site, which is related to the concrete mix. Once this is sorted things should improve. This issue has become political, but maybe that has been to drive certain agendas. The overall quality once completed will be fit for purpose. I think medium is a better rating for this.
 4. Economic – I agree with the rating.
 5. Customer – current rating seems reasonable
 6. Community – We are surprised by the reported displaced people. Project has no large dam, so the only people that would have been displaced would have been those in the construction and camp area. It does not appear to be high value land (eg. agriculture). These people have been moved already, and there will be no further relocation.
 7. Our people – The project area appears to be in a relatively safe area of Uganda and not in areas of high civil unrest or terrorist attack. I think there is always risk of criminal activity – predominantly theft. We were warned of this and both room and office were locked when we were not in them. We have had no issues, and I think being sensible and diligent would reduce the risk of theft to low. In regards to personal safety the entire camp is in a secure compound with guards at the entrance. The office building has a guard at the front at all times. We have found it very safe. A popular area to get away from the camp on your day off is Chobe Lodge, which is also a secure area.
Other risks is malaria which you can take pills for if visit is relatively short, or deal with as the Chinese do which is medicate as soon as you show the symptoms. All rooms have fly screens, aeroguard is available in all room. But in general the amount of mosquitos we have seen does not appear to be that many. Also everyone will need to get the yellow fever injection at least 10 days prior to travel – but this vaccination lasts for life.
I think a Medium Risk is probably reasonable.
 8. Brand and reputation – I do not believe that the High risk is warranted. I think that if we help to improve communication and standard of work it will only improve our reputation. I also know that the Chinese want this project to be a success - there are lots of signs around the camp and construction about quality, safety, reputation, relationship building, community obligations, etc. So I think this should be Medium.

Anyway those are my thoughts.

Regards

Richard Herweynen | Principal Consultant - Civil
MEngSc, BE Civil (Hon), GradDipMgt, MIEAust, CPEng, NPER, RPEQ

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Michael Howarth

From: Jamie Campbell
Sent: Monday, 18 September 2017 8:20 PM
To: Tim Griggs
Subject: FW: Uganda (level 2) Risk Alert for Hydro Tasmania

More minor unrest in Kampala,

Had a couple of level 3 alerts too, one was for the Murchison Falls National Park where a fishman got killed by bandits from the Democratic Republic of Congo. The rest have been people getting murdered in Kampala.

The Murchison Falls National Park is relevant, however the site is relatively secure against that particular risk and I don't go outside the compound at night. The Kampala ones are only something to keep an eye on for when I leave as it may cause extra delays.

Regards

Jamie Campbell | Senior Dams and Geotechnical Engineer BE (Civil, 1st Honours)

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-----Original Message-----

From: risk@concurmessaging.com [mailto:risk@concurmessaging.com]
Sent: Monday, 18 September 2017 8:45 AM
To: Jamie Campbell
Subject: Uganda (level 2) Risk Alert for Hydro Tasmania

Our Risk Service has received the following information at 2017-09-18 10:42:49 BST:

UGANDA: Age limit campaigners arrested in Kampala

At least 14 'Jobless Brotherhood' activists were arrested in Kampala for distributing fliers in protest against a constitutional amendment to remove age restrictions on the presidency. Security measures in downtown Kampala were tightened, with an increased number of police and military personnel reported on the streets.

ADVICE: Anticipate heightened security in urban centres related to the controversial amendment. Avoid all protests as bystanders are at risk of arrest or possible injury in the event of unrest

This email is auto generated. Please do not respond to this message.

Michael Howarth

From: Meg Allen
Sent: Monday, 3 July 2017 3:59 PM
To: Jamie Campbell
Cc: Tammy Chu; Meegan Jackson; Tim Griggs
Subject: Final Confirmation - Jamie Campbell
Attachments: B5329912-CAMPBELLJAMIE MR-Itinerary - Full.pdf; I.0007209301-B5329912-CAMPBELLJAMIE MR-Debtor Invoice.pdf; Overseas Travel Additional Expenses.docx; Jamie Campbell Hbt-Uganda 4jul17.pdf; Overseas Travel Diary.doc

Hi Jamie

Please find attached the following documents for your trip:

- Itinerary
- Tax Invoice (n.b Overseas Airfares are GST exempt)
- E Tickets
- Additional Expenses Form (see notes on form attached)
- Copy of Approval Form
- Overseas Travel Diary

The Australian Taxation Office requires that an employee must keep a Travel Diary whenever the travel is overseas for a period of more than five nights. The employee needs to take the Overseas Travel Diary with them whilst travelling (either in hard copy form or electronic) and complete an entry for each day of the travel, paying particular attention to private, free-time days. Upon return to the office the Overseas Travel Diary should be **signed & sent** to the **Taxation Accountant** on Level 2, Hobart Office, **within five working days**.

Dial **125109** before you leave Australia to check the International Roaming status of you mobile phone.

You are required to report to the Dynamiq Duty Officer. Dynamiq will SMS and email at the following times:

5 July – 1500 local time upon arrival in Entebbe

6-13 July – 0900 local time

15 July – 1030 local time upon arrival in Hobart

If you would like to change any of these check in times please let me know.

From that time, if everything is fine, you will have 3 hours to reply "ok" before a Dynamiq consultant is assigned to the case to locate you. Please note charges will apply.

Please note the SMS and email is a prompt only. If you do not receive this prompt please call Dynamiq to check in. If you manually call into Dynamiq the SMS and email will still come through, but please disregard.

In the event of an emergency please call the Dynamiq/AHI assist number. The number is **+61 2 9978 6668** and is reverse charge 24/7 for any security and/or security matters. Please save the number in your phone as "Dynamiq" for future travel.

If anything changes and you are unable to report in at these times please let Dynamiq know by calling the above number.

If you do not have a Dynamiq/AHI Emergency Assist card please let me know.

If you have any questions please do not hesitate to contact me.

Regards
Meg

Meg Allen | Travel Officer



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e meg.allen@hydro.com.au
w www.hydro.com.au
4 Elizabeth Street, Hobart TAS 7000

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Michael Howarth

From: Tim Griggs
Sent: Thursday, 27 September 2018 11:56 PM
To: Mark Hine-Haycock
Subject: Change in Travel Itinerary - Tim Griggs

Hi Mark,

FYI, I have been requested to attend a meeting in Kampala on the morning of Saturday 29/6. The meeting is at the Serena Hotel and is from 10am-12pm.

So I will need to travel back to Kampala a day early – so will be leaving Karuma site on the afternoon of Friday 28/6. I will be staying at the 'Arirang Hotel & Restaurant' in Kampala on Friday night. I will be accompanied by two representatives from Huadong Engineering Corporation.

After the meeting I will be heading straight to Entebbe airport and my trip home will be the same. ie. leaving Entebbe at 4.20pm on Saturday 29/9 for Dubai.

Dynamic check in time will be the same as per e-mail below:
– 7am Saturday morning (Kampala) and 7am Sunday morning (Dubai) and 10.30am Monday morning (Hobart) – all local time.

Regards,
Tim Griggs
Ph. +61 409 365 329

From: Meg Allen
Sent: Monday, 10 September 2018 3:31 PM
To: Tim Griggs <Tim.Griggs@entura.com.au>
Cc: Tammy Chu <Tammy.Chu@entura.com.au>; Meegan Jackson <Meegan.Jackson@entura.com.au>; Mark Hine-Haycock <Mark.Hine-Haycock@entura.com.au>; Nick Stowe <Nick.Stowe@hydro.com.au>
Subject: Final Confirmation - Tim Griggs

Hi Tim

You are required to report to the Dynamiq Duty Officer. Dynamiq will SMS and email at the following times:

22 Sep – 1500 local time upon arrival in Entebbe
23-30 Sep – 0700 local time
1 Oct – 1030 local time upon arrival in Hobart

If you would like to change any of your check in times please let me know.

From that time, if everything is fine, you will have 3 hours to reply "ok" before a Dynamiq consultant is assigned to the case to locate you. Please note charges will apply.

Please note the SMS and email is a prompt only. If you do not receive this prompt please call Dynamiq to check in. If you manually call into Dynamiq the SMS and email will still come through, but please disregard.

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If anything changes and you are unable to report in at these times please let Dynamiq know by calling the above number.

If you do not have a Dynamiq Emergency Assist card please let me know.

If you have any questions please do not hesitate to contact me.

Regards
Meg

Meg Allen
Travel Officer



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Michael Howarth

From: Nick Stowe
Sent: Friday, 25 May 2018 10:23 AM
To: Tim Griggs
Subject: Approval Form
Attachments: Entura overseas travel form.doc; HSEF0301.3 - JHA Template.docx

Hi Tim,

Please find attached all the forms required for overseas travel.

1. Travel Approval Form
2. JHA Template

Also attached, for your information are:

1. Trip Brief on Uganda from Dynamiq that includes information on security and health, including immunisation requirements.
2. DFAT Link to Travel Advice – <http://smartraveller.gov.au/Countries/africa/east/Pages/uganda.aspx>
3. Contact details for the Travel Doctor, should an appointment be required for immunisation.

City Doctors
188 Collins St
Hobart TAS 7000
Ph: 6231 3003

Other important information:

1. You may need to arrange a Travel First-Aid Kit (this can be obtained from the Travel Doctor).
2. Please forward a copy of your current passport (if you have not already provided that to me)

Please don't hesitate to contact me if you have any questions.

Nick Stowe
Travel and Relocations Officer



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OVERSEAS TRAVEL APPROVAL FORM

*Traveller must obtain approval signatures on this form prior to submission
Attach Draft Travel Itinerary and completed/signed JHA for travel and site/office works*

TICKET DEADLINE	DATE	TIME
(Required by HT Travel to process and pay for ticket)		

EMPLOYEE DETAILS		
Employee Name	Employee No.	Mobile No.
Client Name	Project No.	P/Manager Name

PURPOSE OF TRIP (Provide a brief description of how travel relates to Entura business)

PROPOSED FLIGHT ITINERARY				
Date of Travel	From (Origin)	To (Destination)	Airline	Estimated Depart Time

ACCOMMODATION					
City	Venue Name	Arrival Date	Departure Date	Total Nights	Cost per night \$

VEHICLE HIRE					
Pick-up Location	Date of Pick-up	Time of Pick-up	Destination	Date	Time
Preference Type		Size		GPS	Yes or No

COUNTRY AND SECURITY INFORMATION		
Country Destination	Dynamiq Country Status	DFAT Rating

An approved JHA is required for all overseas travel

DYNAMIQ DAILY CHECK IN	
Country Calling From	
Proposed Call-in Time (Local time)	
Escalation Contact (T/Manager or P/Manager Name)	
Escalation Contact Number (Mobile of Contact Person)	

Dynamiq Duty Officer Telephone Number: +61 2 9978 6668

PASSPORT DETAILS			
Passport Number		Passport Expiry	
VISA Required / Obtained (Type & No)			

EMERGENCY CONTACT DETAILS			
Name of Next of Kin			
Address of Next of Kin			
Contact Number for Next of Kin	Home:	Mobile:	
Traveller's Contact Number Whilst Overseas			
Client Details - Name, Address and Contact Number			

SUMMARY OF ESTIMATED COSTS (IF COSTS AVAILABLE)			
Billable: Yes or No	Client Funded: Yes or No ____%	Entura Funded: Yes or No ____%	
Airfares	\$	Accommodation & Meals	\$
Registration Fees (e.g. Course/Seminar)	\$	Other Travel & Misc Expenses	\$
Total Estimated Expenditure			

PAYMENT FOR TRAVEL															
<input type="checkbox"/> Traveller's Entura Mastercard				<input type="checkbox"/> Manager's Entura Mastercard				<input type="checkbox"/> M/Card details previously supplied							
Name on Card															
Mastercard Details															
5	5	5	0	/										Exp	CCV No.

OVERSEAS TRAVEL CHECKLIST		
<input type="checkbox"/> Vaccinations Identified & Current	<input type="checkbox"/> Visa Identified - Current or Application Completed	<input type="checkbox"/> Travel & Worksite JHA (attached)
<input type="checkbox"/> Mobile or iPad has international global roaming & data allowance package added (if required),	<input type="checkbox"/> Do you require a Local Mobile SIM	
<input type="checkbox"/> Duration of travel over five days – if yes, please obtain copy of Travel Diary from our Hydro Tas Travel Co-ordinator		

TRAVEL ITEMS FOR LOAN (The items below are available for loan from Reception)		
<input type="checkbox"/> Remote Area First Aid Kit	<input type="checkbox"/> Door Stopper Alarm	<input type="checkbox"/> Portable Smoke Alarm/Torch
<input type="checkbox"/> International/Vehicle Powerpoint Adaptor	<input type="checkbox"/> Vuey Tueys for Papua New Guinea and Laos	

SIGNATURES			
Traveller	Name:	Signature:	Date:
Project Manager			
Team Manager			
National Director	Angus Swindon		
Managing Director Entura	Tammy Chu		

Michael Howarth

From: Eleni Taylor-Wood
Sent: Thursday, 13 December 2018 12:56 PM
To: Tammy Chu
Cc: Amanda Ashworth
Subject: Briefing report - Karuma HPP
Attachments: Briefing report - Karuma HPP.docx

Hi Tammy,

Attached is the revised report for Steve

Cheers

Eleni

TELEGRAMS: "KDGO"
DPC: 0718731761
OC STN: 0714298806
OC CID: 0718946054



CRIMINAL INVESTIGATIONS DIRECTORATE
KIRYANDONGO POLICE STATION
P. O. BOX 39,
MASINDI (UGANDA).

UGANDA POLICE FORCE

IN ANY CORRESPONDENCE ON THIS MATTER
PLEASE QUOTE REF:KDGO/13/VOL I/72

DATE: 04/09/2018

RE: REPORT REGARDING DEATH BY SHOOTING TO THE PREJUDICE OF ONE [REDACTED]
WORKER OF KARUMA SINOHYDRO PROJECT

(RECEIPT NO. Y1882954)

BACKGROUND

1. That there is construction of the 600 MW Karuma Sino Hydro Power Project which kicked off on the 12th August, 2013. The Project is a Six (6) Year program and construction is in it's advanced and final stages where most of the work is in tunnels while construction materials and accommodation for the workers is above the ground. Since the main contractor is a Chinese Company, most of the technical people are Chinese nationals but the majority of the workers are the locals.
2. It was on Monday 25th June, 2018 at around 1200 hrs when one [REDACTED] a Safety Officer with Sino Hydro Project Karuma while on duty got shot by a stray bullet during a riotous situation done by the workers at Sino during confrontation with security men.
3. A report was then made at Kiryandongo Police Station vise SD Ref: 32/25/06/2018 at 1655 Hrs by [REDACTED] a Police Officer attached to Karuma Police Post.

POLICE ACTION

1. A case file was opened vide KDGO CRB 470/18 and investigations commenced
2. The police officers rushed to the scene. The scene was revisited by a team of police officers and SOCO from Kiryandongo Police Station.

3. The body was picked from the project clinic and taken to Kiryandongo Hospital Mortuary for post mortem.
4. Relevant statements were obtained from witnesses, the soldiers and Police officers who were on duty.
5. Arrests of those involved in the strike was carried out
6. A W/T (Wireless Transmission) message was drafted and transmitted.

FINDINGS:

1. That the project site is under guard of UPDF soldiers, Police, Pinnacle security and HSE in all major entrances to the project area, all the gates are manned by the project security beefed up by the government forces.
2. On the fateful day of 25/06/2018 as a normal routine check of the workers returning for lunch aboard their buses and about six buses came in a convoy and the soldiers at the gate deployed themselves each to cover up one bus, in one of the buses one worker came out with a bag and immediately started running away, the soldier on duty suspected him carrying scrap chased him and he got arrested , he was brought back to where other workers were but incidentally these other workers now wanted forcefully to remove him from the soldiers, pushing down one soldiers by names of [REDACTED] as they wanted to remove the riffle from him and another soldier who then resisted prompting them to fire up some bullets trying to disperse them
3. In the process according to [REDACTED] he states that during the process of firing to disperse the crowd, he saw [REDACTED] (the deceased) come towards them running crying for help that he has been beaten and he was bleeding from his left shoulder, knelt down but looked very weak and eventually stopped talking, they carried him to the bus where he was rushed to the hospital but later pronounced dead.
4. At the scene several cartridges were recovered, a black watch, a metallic hook and soil containing blood, and henceforth exhibited.
5. That the deceased started working with the project at Sino 1 since the year 2015 as a safety Officer till the fateful day of his demise.

6. The army officers who were involved in the shooting scuffle were allegedly arrested by the UPDF Management and eventually transferred to 4th Division base in Gulu for further management but they had earlier on made their statements to that effect.
7. The key causer of the scuffle (the unidentified worker who had the metal material and) eventual during the intense scuffle managed to disappear and mixed with others freely again and consequently could not be sacrificed by his colleagues and has remained un identified too.
8. The post Mortem results showed that the deceased died of hemorrhagic shock with hyperon secondary to hemophneumothorax a result of a gunshot wound.

OBSERVATION

1. The rate of stealing of project materials is on increase on daily basis by non other than the workers themselves.
2. Intensified vigilance by the security personnel has also not yielded so much help towards the rampant thefts as the workers undermine their efforts towards curbing the vice

PENDING INQUIRIES

1. Identification of the real person who shot at the deceased
2. Recovery of the riffle which was involved in the killing of the deceased
3. Submitting the exhibit gun to the Government Analytical Laboratory/ gunsmith (GAL) to ascertain whether it was the exact one which shot at the deceased and comparison with the cartridges got from the scene.
4. Arrest and prosecution of the suspect (s)
5. Submission of the case file to RSA for legal advice

CONCLUSION:

The body was picked brought to Kiryandongo Hospital where Post Mortem was done then later handed to the relatives for a decent burial at Kasanja Village Buikwe District.

The preliminary arrest of the workers which was done was given consideration during an impromptu meeting by the district security heads that they all be released after their statements are recorded in order to calm down the situation at the project and karuma in general.

The killer and killer gun have not been identified as several security personnel shot despite the arrest of the five soldiers and their detention in Gulu.

However the case file KDGO CRB 470/18 is still under inquiry pending completion of the pending inquiries.

This Report is made on strength of Receipt No. Y1882954



DISTRICT CID OFFICER KIRYANDONGO

C.C: DISTRICT POLICE COMMANDER [REDACTED]

C.C: THE REGIONAL CID [REDACTED]

C.C: THE DIRECTOR CID [REDACTED]

C.C: THE IGP KAMPALA

Michael Howarth

From: Eleni Taylor-Wood
Sent: Monday, 24 October 2016 9:49 AM
To: David Procter
Subject: FW: Uganda Hydropower Project
Attachments: 1a Initial Screening - final- Karuma Uganda.xlsx

Pt 3

Eleni Taylor-Wood | Principal Consultant, Environment and Social
BSc (Hons), PhD



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From: Ajit Garg
Sent: Thursday, 20 October 2016 3:34 PM
To: Eleni Taylor-Wood
Cc: Tammy Chu; Ajay Sharma; Amanda Ashworth; Tapanjyoti Mukhopadhyay
Subject: FW: Uganda Hydropower Project

Hi Eleni,

Please find attached the screening for the Uganda project. Will be great in case you can review it today. Sorry for disturbing you on a public holiday.

Based on my review there are technical and political concerns associated with the project. However they can be resolved by clear definition of Entura's role and scope and appointing experienced staff on the project who can safeguard Entura's interests.

The country screening for the project is also required and I plan to send that by tomorrow morning. However, as per the DFAT rating the project is located in safe zone. Richard has a friend working on the project and based on the inputs received by Richard, no safety issues are foreseen.

Regards,

Ajit Garg | Business Development Manager
B-Tech (Mech), PGDBA, PMP



The power of
natural thinking

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From: Ajit Garg

Sent: Wednesday, 19 October 2016 3:59 PM

To: Eleni Taylor-Wood

Subject: FW: Uganda Hydropower Project

Hi Eleni,

Sorry, forgot to include you in the trailing mail.

Regards,

Ajit Garg | Business Development Manager

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From: Ajit Garg

Sent: Wednesday, 19 October 2016 3:53 PM

To: Tammy Chu; Ajay Sharma

Cc: Amanda Ashworth

Subject: RE: Uganda Hydropower Project

Dear Ajay/ Tammy

I am in the process of carrying out the sustainability screening for Karuma Hydro Project. The complete screening will take some time but in the meantime want to flag the following critical issues:

- There are reports that the construction work carried out is not up to the mark. One of the news article says that the Karuma project manager confirms shoddy works with Cracks appearing in the concrete and other problems. Refer :
 - <http://www.monitor.co.ug/News/National/Karuma-project-manager-confirms-shoddy-works/688334-3148984-1sinp1z/index.html>,
 - <http://allafrica.com/stories/201604020212.html>

- <http://www.monitor.co.ug/Business/Commodities/-Karuma-project-contractors-fly-in-experts-to-assess-dam-cracks/688610-3169898-oqrpqf/index.html>.
- <http://www.chimpreports.com/museveni-loses-temper-as-engineers-mess-up-karuma-isimba-dams/>
- <http://ntv.co.ug/news/local/15/oct/2016/parliaments-investigation-karuma-dam-project-halted-attorney-general-14621>
- The top story in the Ugandan *Daily Monitor* questions the long-term structural viability of the Karuma and Isimba dam projects. According to the Kampala-based daily, a report from the ad hoc committee investigating shoddy works and negligence by contractors and government officials at the Karuma and Isimba hydropower projects has revealed a hair-raising mess. The leaked report warns that if the defects on the two dams, which are to cost nearly 2 billion euros, are not rectified, and supervision and management streamlined, the durability of the projects could be compromised. The report speaks of a 'cancer of the structure' which would not be immediately obvious but could have dangerous long-term implications. Corrosion and the use of inferior grades of steel and concrete are the main problems identified in the report. The two dams are scheduled to be ready by 2018, although experts see meeting that deadline as unlikely because of infighting between project managers and lingering questions about the integrity of engineering on the projects. The Isimba Dam deputy project manager has dismissed the findings as alarmist. Karuma dam project officials refused to comment on the specific issues of quality raised in the report.

In addition to this there are many other news articles writing about this.

- There have been mysterious death of 2 people at the project site. Refer:
 - <http://gmepa.com/two-employees-die-at-karuma-hydro-power-project-mysteriously/>
- Bribery and corruption news reports to wrap up the shoddy works:
 - <http://www.observer.ug/business/38-business/45689-chinese-firms-get-govt-support-over-new-karuma-isimba-suit>

There have been other community protests and other issues but off late since the last year there has been nothing in the news/ internet.

Regards,

Ajit Garg | Business Development Manager
B-Tech (Mech), PGDBA, PMP

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From: Tammy Chu
Sent: Wednesday, 19 October 2016 12:09 PM
To: Ajay Sharma
Cc: Amanda Ashworth; Ajit Garg
Subject: RE: Uganda Hydropower Project

Great the project also needs to be screened and it needs to have rigour applied to this process

Tammy Chu | Managing Director
BE(Hons)(Civil), FIEAust, MBA, GAICD



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From: Ajay Sharma
Sent: Wednesday, 19 October 2016 5:38 PM
To: Tammy Chu
Cc: Amanda Ashworth; Ajit Garg
Subject: RE: Uganda Hydropower Project

Tammy,

This was the first thing we (I and Ajit) checked. The project is located on Karuma falls on Victoria Nile and falls in yellow zone (exercise high degree of caution). Ajit is carrying out further screening including collection of information through contacts at EIPL.

Regards, Ajay

Ajay Sharma | Managing Director (Entura India)
Director- International Business Development (Entura Hydro Tasmania)



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From: Tammy Chu
Sent: 19 October 2016 11:55
To: Ajay Sharma
Cc: Amanda Ashworth
Subject: RE: Uganda Hydropower Project

Ajay

We need to run a country report and screening for this please.

<http://smartraveller.gov.au/Countries/africa/east/Pages/uganda.aspx>

Tammy Chu | Managing Director
BE(Hons)(Civil), FIEAust, MBA, GAICD



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From: Ajay Sharma
Sent: Wednesday, 19 October 2016 5:16 PM
To: Mark Hine-Haycock; Tapanjyoti Mukhopadhyay; Angus Swindon; Ajit Garg
Cc: Tammy Chu; Chunhua Li
Subject: FW: Uganda Hydropower Project
Importance: High

Dear all,

I received the trailing mail from Chunhua regarding request from Huadong for engineering support for an under construction hydro project in Uganda. Power China is the EPC contractor with Huadong as the main designer for EPC. The project has participation from other consultants with India based EIPL as Owner's Engineer and Switzerland based AF Consult as supervision consultant.

Post receipt of mail, I had a chat with Chunhua and understand that immediate requirement is to nominate 2 engineers to visit the project site for acquaintance with the project, understanding of Huadong's requirements (for communication and coordination with the owner's engineer) and drafting scope of work for future engagement.

Scope of work: RFP provided by Huadong is attached. I understand that this document needs further clarity to ensure compliance to Huadong's requirement, this can be achieved after the site visit and discussions with Huadong.

I propose to take up this in following manner:

Proposal:

- Stage 1: nomination of 2 resources (1 each from India and Australia) for initial site visit, interactions with site staff, understanding of exact requirements and drafting of proposal for further engagement;
- Stage 2: full proposal for Entura's engagement to cover the resources required till completion of project.

Resources: Huadong has listed number of resources in the attached document but for stage 1 (site visit) required resources are:

- Civil engineer: experience upto 8 years (or more) on design of concrete structures for hydro projects
- Civil/ Geotech engineer: to provide inputs on excavations, slope stabilisation and design of underground power house.

Probable resources:

- Civil: Mohsen, Rajeev Raina, Nick West, Kavish Bibra, Richard (very senior but might be suitable in understanding the requirements, documentation and finalisation of scope of work)

- Geotech: Tapan, Richard, Tim.....

Site visit: Huadong has requested for site visit as early as next week. In my opinion this is too short to complete screening, find the suitable resources, obtain visas and mobilise. As per my discussions with Chunhua, we can seek time till early November. Delay till early November will be important for India based resources because of Diwali festival on 31st October.

Next steps:

- Ajit: Please complete sustainability screening. Let me know (today) if you see a red flag/ show stopper
- Mark H and Angus: Please nominate resources for site visit. Required asap, if possible today but latest by tomorrow morning (afternoon your time). Please explain the situation and expectations to the nominated resource(s) and also request for inputs to me on drafting the proposal (for stage 1)
- Tapan: Please nominate resource in consultation with Mark
- Chunhua: Please let me know if my understanding of the requirements/ approach is appropriate
- Tammy: Opinion/ suggestion please

Based on inputs received, I will send a proposal to Huadong tomorrow afternoon (India time). Tomorrow morning I am meeting SEPCO and shall be out of office but will be available on mobile.

Apologies for short time frame but we need to demonstrate promptness and timely responses to JV partners.

Regards, Ajay

Ajay Sharma | Managing Director (Entura India)
Director- International Business Development (Entura Hydro Tasmania)



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From: Chunhua Li
Sent: 19 October 2016 09:15
To: Tammy Chu
Cc: Ajay Sharma
Subject: Uganda Hydropower Project

Hi Tammy,

I have just spoken to Mr Shi who we met in Hangzhou on last trip. He is in charge of the Uganda hydropower project (600MW x 2 ?) which Huadong is doing the design as part of Power China's EPC contract for the project. You may be able to recall he briefed us about the project during our visit. India's EIPL is the Owner's engineer who is supervised by AF consulting from Switzerland.

The project is under construction with most of the powerhouse, tunnels, dam foundation and other excavation work completed or at late stage.

Huadong intends to seek Entura's support on the project. The immediate task is to manage/coordinate communications with Owner and Consulates; manage design approval process and help review the design completed by Huadong.

They expect Entura to send two civil engineers to the site, as soon as as possible (before the 24th is possible).

I received the attached RFP while I was writing this message, so I am going to forward the RFP to you which wil provide more details.\

Tammy I will speak to you soon in about 30 minutes or so

Regards
Chunhua

Michael Howarth

From: Amanda Ashworth
Sent: Friday, 7 December 2018 3:40 PM
To: Eleni Taylor-Wood
Subject: FW: karuma

From: Eleni Taylor-Wood
Sent: Friday, 21 October 2016 11:27 AM
To: Amanda Ashworth
Subject: karuma

Roles on project:

- Employer/Owner: The Government of Uganda represented by the Ministry of Energy and Mineral Development
- Implementing Agencies: Uganda Electricity Generation Company Ltd (UEGCL) is implementing the hydropower component of the project, while Uganda Electricity Transmission Company Ltd (UETCL) is implementing transmission interconnection project.
- Owner's Engineer (Consultants): Energy Infratech Private Uganda Ltd (EIPUL) is the consultant for the hydropower component of the project, while Gopa Intec is the consultant for the transmission infrastructure.
- EPC contractor: Sinohydro Corporation Ltd
- In December 2015, UEGCL hired two consultants, AF Consults and SMEC, to supervise the projects (Karama and Isimaba) and report to the agency, while Indian firm Energy Infratech, reports to the ministry. All three are doing the same job, with average pay for a consultant for one month hitting \$24,000.

Issues (looked more broadly, then focused on last 12 months) which will lead to reputational issues:

- Contractual issues (see paras below) plus corruption issues associated with the initial contract
- Construction issues (as noted by Ajit): According to independent experts however, the cracks were most likely the result of Sinohydro neglecting basic procedures in managing the temperature of the concrete mixture during construction. Because cement generates heat when it reacts with water, it is a basic procedure for constructors of major civil works in high ambient temperature environments such as Uganda to preclude cracking by using ice to mix the concrete. It was not immediately clear if Sinohydro followed this basic procedure: <http://256businessnews.com/sinohydro-concedes-to-defects-in-karuma-dam-concrete-works/>
- Similar cracks were identified at the 183MW Isimba Hydropower station where it is claimed Sinohydro is in charge if the construction works after it was subcontracted by sister Chinese firm China Water and Engineering Corporation.
- Social issues (lack of engagements, poor compensation incl bribery issues) – jan 16 protest against Sinohydro by unemployed locals as sino gives preference to employing chinese over locals: <http://gmepa.com/unemployed-youths-storm-karuma-hydro-power-project-demanding-for-jobs/>
- Environmental issues (construction management focus on tick box rather and consideration of issues). Article about Sinohydro employee committing suicide in july 16 after being charge with disposing of a hazardous chemical into a water source that supply water to the local workforce: <http://gmepa.com/chinese-expatriate-commits-suicide-at-karuma-hydro-power-projectgmepa-news/>
- Safety: The EastAfrican has seen at least 845 emails and letters from Infratech, in which the firm raises issues including workers' occupational and health considerations, violation of National Environment Management Authority guidelines at the two sites and deviation from the designs: <http://www.theeastafrican.co.ke/news/Uganda-energy-officials-trade-blame-over-Karuma-Isimba-dams/2558-3152542-c7f7ki/index.html>

Sound like there is potential for further social issues as well as environmental issues (see web site below).

There are a number of NGO's (national and international) watching the project and expecting issues, partially due to issues associated with Bujagali and belief that the government has not learnt from that project.

My feeling is that the reputation of the project will get worse before it get better/goes quiet and gut feeling is that it is one that we don't want to be involved with given the historic and current controversy associated with dam project in Uganda, incl this project. X

<http://www.uwasnet.org/Elgg/news/view/9362/uwasnet-reports-on-work-at-karuma-hydro-power-plant-at-the-joint-technical-review-meeting>

from 2015: **FAILED TO TAKE LESSONS FROM BUJAGALI**

Currently the Karuma project is once again embroiled in controversy, this time over an insurance contract. Sinohydro has failed to pay premiums to a consortium of 23 insurance and re-insurance companies, and is instead questioning the 2013 contract. National policy requires all national projects to be insured with Ugandan insurance companies as a way of reducing capital flight and help deepen the domestic financial system. However the contractor is uncomfortable with this arrangement. This disagreement means that component of the project is not insured and Uganda could lose in the event of a catastrophe.

The issues which negatively affected and delayed the construction of the Bujagali dam are almost the same issues which are affecting the construction of the Karuma dam. This therefore shows that the government of Uganda did not learn from the experience of Bujagali dam especially in the areas of procurement of contractors and compensation of the people to be affected by the dam. Uganda has to completely settle the abovementioned issues if it is to improve its energy sector and achieve universal electrification as stated in its Vision 2040 master plan.

Eleni Taylor-Wood | Principal Consultant, Environment and Social
BSc (Hons), PhD

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Michael Howarth

From: Tammy Chu
Sent: Thursday, 20 October 2016 10:52 AM
To: Richard Herweynen
Cc: Ajay Sharma; Tim Griggs; Nick West; Mark Hine-Haycock; Angus Swindon; Ajit Garg; Tapanjyoti Mukhopadhyay
Subject: Re: Huadong Uganda Hydropower Project - Civil resources required ASAP

Richard,

Thanks. We are preparing a sustainability screening and security assessment, and working through mitigation measures. I have just spoken with Chunhua and he will advise later today of site arrangements and logistics and support that PC would provide.

I have read the DFAT health warnings. This is not an Ebola affect region, but yellow fever vaccination and malaria tablets are required.

Chunhua said if we can't be there on Monday a couple of days later would likely be OK. We are checking.

Would you have availability to fly Monday/Tuesday?

Tammy

On 20 Oct 2016, at 10:30 AM, Richard Herweynen <Richard.Herweynen@entura.com.au> wrote:

To all:

So I can definitely confirm that this is the same project that my friend [REDACTED] in Switzerland is a reviewer on. [REDACTED]

I have been in touch with him, and he also confirms that safety is not a problem for this project. He says it is in the safer zone of Uganda. So I think that had been confirmed from a number of people now. However, this should not stop good practice, eg. Pickup from airport, escorted with someone from the project team, etc.

I know that the project has some technical issues, and there were also some quality issues raised.

I also know the politics on the project are very interesting. African politics. Then Chinese contractor and Indian owners engineer. Then due to some of the quality concerns, AF Consult was brought in as a second level of review.

I would love to get involved, but being there this coming Monday is an issue.

Cheers
Richard

Sent from my iPad

On 20 Oct 2016, at 12:38 AM, Ajay Sharma <Ajay.Sharma@entura.com.au> wrote:

While gathering information on this project, I had a discussion with Rajeev Sethi. Rajeev is General Manager at EIPL and has been involved with this project since

beginning. We have also dealt with Rajeev as he was one of the advisors engaged by the developers of recently completed Chanju hydro project in India.

As per Rajeev, the project area is absolutely safe, there are some technical issues but such issues are more political less technical and off late the project got negative media. Rajeev rates construction quality superior to what is seen in South Asia but inferior to European contractors.

Rajeev is travelling to site on Friday and confirmed that there is a meeting scheduled for next week which will have participation from owners and all the consultants. I believe Huadong is requesting us for the participation is same meeting??

Uganda provides visa on arrival to most nationalities including India.

Regards, Ajay

Sent from my iPad

On 19 Oct. 2016, at 5:12 pm, Richard Herweynen
<Richard.Herweynen@entura.com.au> wrote:

A really good friend of mine from AF Consult is working on this project as a reviewer.

I know this project has a lot of issues, based on my discussions with him during ICOLD this year.

But I also know that based in these discussions this project is in a reasonably safe area of Uganda.

Cheers
Richard

Sent from my iPad

On 19 Oct 2016, at 8:59 PM, Ajay Sharma
<Ajay.Sharma@entura.com.au> wrote:

As requested. This is the only document I have from Huadong.
Regards, Ajay

From: Tim Griggs
Sent: 19 October 2016 15:59
To: Ajay Sharma
Cc: Richard Herweynen; Nick West; Mark Hine-Haycock; Angus Swindon; Tammy Chu; Ajit Garg; Tapanjyoti Mukhopadhyay
Subject: RE: Huadong Uganda Hydropower Project - Civil resources required ASAP

Hi Ajay,

Are you able to send through the RFP document that you refer to in the emails below.

Regards,
Tim Griggs

From: [Ajay Sharma](mailto:Ajay.Sharma@entura.com.au)
Sent: Wednesday, 19 October 2016 8:56 PM
To: [Nick West](mailto:Nick.West@entura.com.au)

Cc: Tim Griggs; Richard Herweynen; Mark Hine-Haycock; Angus Swindon; Tammy Chu; Ajit Garg; Tapanjyoti Mukhopadhyay
Subject: RE: Huadong Uganda Hydropower Project - Civil resources required ASAP

We looked at the project location and compared it with DFAT advisory. It falls at yellow zone (exercise high degree of caution)
Ajit is working on screening, we should have further details by COB today (India time)

From: Nick West
Sent: 19 October 2016 15:24
To: Ajay Sharma
Cc: Tim Griggs; Richard Herweynen; Mark Hine-Haycock; Angus Swindon; Tammy Chu; Ajit Garg; Tapanjyoti Mukhopadhyay
Subject: Re: Huadong Uganda Hydropower Project - Civil resources required ASAP

Thanks Ajay,

My knowledge of Uganda is that there is a good half of the country (the East) and a not so good half (the west). If the project is on the Nile River, that's in the good part. If the project is upstream of Lake Victoria, it may not be so good from a security point of view.

Do you know where the project is?

Nick West
Senior Civil Engineer
Entura
p: +61 (0)3 6245 4109
p: +27 (21) 202 2231
f: +61 (0)3 6245 4550
m: +61 408 952 315
e: nick.west@entura.com.au
w: entura.com.au

On 19 Oct. 2016, at 8:47 pm, Ajay Sharma <Ajay.Sharma@entura.com.au> wrote:

Hi Nick,
I have shared whatever I knew at this stage, need to seek further details from Huadong as we progress on this.
At this stage I am thinking of total duration of 2 weeks for site visit and stage -1. I still feel Monday 24 October will be challenging for completed travel arrangements/

approvals and sustainability
screening.

Regards, Ajay

Ajay Sharma | Managing Director (Entura India)
Director- International Business Development (Entura Hydro Tasmania)

<image001.jpg>

p +91 120 4033101 | **m** +91 9910386409 (India); +61429305589 (Australia)
e ajay.sharma@entura.com.au
w www.entura.com.au

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From: Nick West
Sent: 19 October 2016 15:12
To: Tim Griggs
Cc: Richard Herweynen; Mark Hine-Haycock; Angus Swindon; Tammy Chu; Ajay Sharma
Subject: Re: Huadong Uganda Hydropower Project - Civil resources required ASAP

Hi Tim,

It sounds like an interesting opportunity but I'd like a bit more detail on when and for how long. Monday is technically possible for me but I need to rearrange a lot of both work and private commitments.

Nick West
Senior Civil Engineer
Entura
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f: +61 (0)3 6245 4550
m: +61 408 952 315
e: nick.west@entura.com.au
w: entura.com.au

On 19 Oct. 2016, at 8:26 pm, Tim Griggs
<Tim.Griggs@entura.com.au>
wrote:

Hi Richard and Nick,

Michael Howarth

From: Jamie Campbell
Sent: Wednesday, 4 October 2017 5:30 PM
To: Leigh Smith
Cc: Mark Hine-Haycock; Tim Griggs
Subject: RE: Uganda (level 3) Risk Alert for Hydro Tasmania

Thanks Leigh,

It's highly unlikely that I will have problems as I only need to transit through Kampala, that said it's a tinderbox down there at the moment. The Government/Military/Police crackdowns are getting worse according to the local news.

It will probably be fine, but if something goes wrong I doubt whether Dynamiq will be able to do anything in time to help as its most likely going to be a sudden event. Typically in those situations it is up to the individual to assess and manage the situation the best they can.

Regards

Jamie Campbell | Senior Dams and Geotechnical Engineer
BE (Civil, 1st Honours)



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From: Leigh Smith
Sent: Wednesday, 4 October 2017 2:08 AM
To: Jamie Campbell
Cc: Mark Hine-Haycock; Tim Griggs
Subject: RE: Uganda (level 3) Risk Alert for Hydro Tasmania

Hi Jamie and others

I have spoken directly with dynamiq and they have advised the following

Travel through Kampala remains acceptable with a heightened level of vigilance, they will advise you if the situation worsens and are ready to arrange on site security in the event that you deem this necessary should the situation change in your particular area. If you feel this has occurred please contact dynamiq immediately on the number that they have provided on your sms message.

Regards
Leigh

From: Tim Griggs
Sent: Wednesday, 4 October 2017 9:22 AM
To: Jamie Campbell
Cc: Leigh Smith; Mark Hine-Haycock
Subject: RE: Uganda (level 3) Risk Alert for Hydro Tasmania

Hi Jamie,

I understand your concern is the risk associated with driving through Kampala on the way to the airport on Friday morning.

I suggest following up with the drivers / site staff who travel regularly through Kampala to understand if there is a significant risk of encountering political protests, etc.

Mark will be back in the office tomorrow (Thu 5th October) to discuss concerns and options.

Regards,
Tim Griggs

PS. I have attached the risk definitions used by Dynamic. Level 3 is classified as a 'Medium' risk.

From: Jamie Campbell
Sent: Tuesday, 3 October 2017 9:07 PM
To: Mark Hine-Haycock; Tim Griggs
Subject: Fwd: Uganda (level 3) Risk Alert for Hydro Tasmania

Getting worse down there

Get [Outlook for iOS](#)

From: risk@concurmessaging.com <risk@concurmessaging.com>
Sent: Tuesday, October 3, 2017 1:05:00 PM
To: Jamie Campbell
Subject: Uganda (level 3) Risk Alert for Hydro Tasmania

Our Risk Service has received the following information at 2017-10-03 11:00:26 BST:

UGANDA: Grenades thrown at homes of opposition politicians in Kampala

At least two grenades were thrown at the home of Allan Ssewanyana and three at the home of Robert Kyagulanyi Ssentamu – both opposition politicians who have objected to the government's attempt to remove the presidential age limit – in Kampala, overnight on 2-3 October. No injuries were reported in the attacks.

ADVICE: Anticipate heightened security in affected areas of Kampala in the near-term. Remain vigilant at all times; report all suspicious objects or behaviour to local authorities

This email is auto generated. Please do not respond to this message.

Michael Howarth

From: Tim Griggs
Sent: Tuesday, 11 December 2018 4:38 PM
To: Eleni Taylor-Wood
Cc: Nick West; Amanda Ashworth
Subject: RE: Interim report.docx

Hi Eleni,

With respect to the 'Ongoing assessment and monitoring section', I would suggest the following change in wording (given in red):

During these site visits, no concerns were raised by staff regarding their safety on site or that of other workers.

- ◊ This change considers the fact that Jamie and Nick both expressed some concerns with respect to travel through Kampala and / or surrounding regions during their site visits. Jamie expressed concern with the security in Kampala (due to political tensions) and Nick expressed concern with a Level 2 alert for Crimean-Congo Hemorrhagic Fever in certain surrounding regions. These issues were both reviewed prior to them leaving site and it was considered that the risks were low given they would be driven straight to Entebbe airport. The JHA was also specifically updated to consider the CCH Fever issue.

Regards,
Tim Griggs

From: Eleni Taylor-Wood
Sent: Tuesday, 11 December 2018 4:04 PM
To: Tim Griggs <Tim.Griggs@entura.com.au>; Nick West <Nick.West@entura.com.au>
Cc: Amanda Ashworth <Amanda.Ashworth@entura.com.au>
Subject: FW: Interim report.docx

Hi there,

Attached is the interim report so far for your review and comment.

Cheers

Eleni

**INTERNAL
BRIEFING REPORT**

Karuma Hydropower Project

13 December 2018

t/a Entura, Level 25, 500 Collins Street,
Melbourne VIC 3000 Australia

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Document information

Title	Briefing report
	Karuma Hydropower Project
Client organisation	Hydro Tasmania
Client contact	Stephen Davy
AdminDM no.	ENTADM-41DD6
Project Manager	Amanda Ashworth

Revision history

Revision 1.0

Revision description	Submitted		
Prepared by	Amanda Ashworth, Eleni Taylor-Wood, Tim Griggs		13 Dec 18
Reviewed by	Tammy Chu, Michael Howarth, Ajay Sharma		13 Dec 18
Approved by	Tammy Chu		13 Dec 18
	(name)	(signature)	(date)
Distributed to	Stephen Davy Cc: El Inglis; Sam Meyer	Hydro Tasmania	13 Dec 18
	(name)	(organisation)	(date)

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1. Screening of the Karuma Hydropower project

1.1 Project background

Planning for the Karuma Hydropower Project (Karuma HPP) commenced in the mid-1990s, with the initial feasibility and environmental and social impact assessment (ESIA) completed by Norpak Energy. The feasibility study and ESIA was then updated by Energy Infratech PVT Ltd (EIPL), including preparation of a resettlement action plan (RAP) which was implemented by the Uganda Government in 2012. SinoHydro was awarded the construction contract in 2013, with construction commencing in August 2013. The project is expected to be completed in 2019.

1.2 Entura’s scope of works

Entura was engaged by PowerChina Huadong Engineering Corporation Ltd (PowerChina Huadong), a technical design institute contracted by SinoHydro, to provide technical support and assistance associated with the review and approval of design documentation in accordance with international standards. Our scope of work was specifically related to the design approvals and did not include technical support for the construction that was being managed by SinoHydro. This support has been undertaken in our offices in Australia as well as on-site in Uganda. The current contract commenced in March 2017 and has a duration of 30 months for support and advice on an as needs basis.

Figure 1.1 shows Entura within the project structure for construction of Karuma HPP.

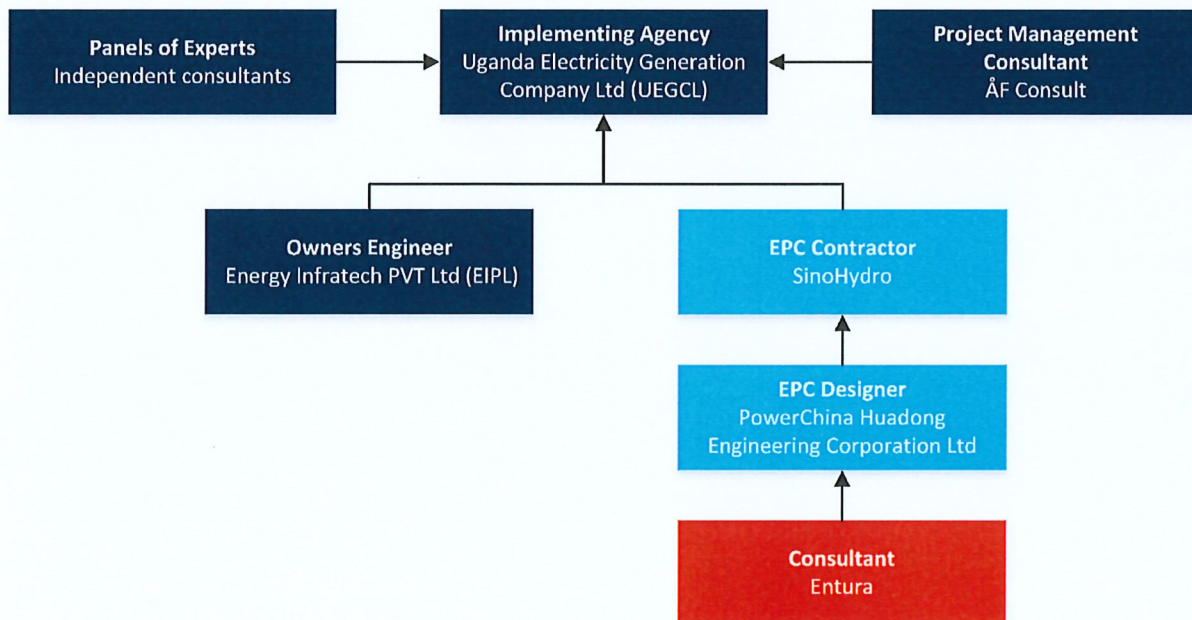


Figure 1.1: Karuma HPP organisational chart

A project timeline has been prepared outlining Entura’s involvement during construction of Karuma HPP (Figure 1.1).

1.3 Project screening

Entura screens all new projects to evaluate them against Hydro Tasmania's sustainability code and potential impact on brand and reputation of Hydro Tasmania or Entura. The screenings are undertaken based on information available on the internet, as well as information provided by companies, our network and/or site visits.

Entura was approached by PowerChina Huadong on 19 October 2016 to provide support for approval of designs by EIPL. This included a request to visit the project site in October 2016 to acquaint ourselves with the project and PowerChina Huadong's requirements.

As Entura had not worked in Uganda or on Karuma HPP previously, a screening of Uganda and the project was requested by Tammy Chu. The decision to proceed with involvement in the project was made using a number of inputs including:

19 October 2016

- Acknowledgement of need for country and project screenings, Hydro Tasmania travel approvals and safety checks prior to travel (including vaccination requirements).
- Country and project screening commenced.
- Assessment of project location within Uganda compare with DFAT advisories for the area.
- Feedback from staff based on a discussion with a colleague in AF Consult i.e. project in relatively safe area of Uganda, but project has some technical and other related issues.
- Discussions with staff proposed for the project site visit to assess their comfort level and willingness to travel to Uganda.

20 October 2016

- Discussion with EIPL General Manager at Karuma HPP regarding the project and site safety. EIPL described the site as safe but that there were some technical issues.
- Discussion with PowerChina Huadong regarding site safety, security and medical facilities on site.
- Initial screening of the Karuma HPP completed and evaluated as requiring a detailed screening based on high risk ratings on some criteria. Mitigation measures were identified to assess residual risk ratings.
- Proposal submitted to PowerChina Huadong for an initial site visit in late October/November 2016 and notice to proceed provided.

21 October 2016

- Summary of issues raised by the initial screening against Hydro Tasmania Sustainability Code was submitted to Entura's executive team (ET) on 21 October 2016 for initial evaluation.
 - prompted a request for additional information on site practices to be completed by the engineers visiting the site to discuss the proposed project.
- Request to Dynamiq to provide information on travelling in Uganda, in particular to the Karuma HPP site.
- Provision of Uganda Security Report by Dynamiq plus anecdotal observation by the Managing Principal, Dynamiq.

- Request to Dynamiq to provide information on Yellow Fever vaccination and time taken to gain effect.
- Stephen Davy notified of request by PowerChina Huadong to work on Karuma HPP and the proposed scope of works. A summary of the checks completed by Entura regarding project issues and safety was also provided, along with notification that a screening was being prepared.

22 October 2016

- Information provided by the Managing Principal, Dynamiq regarding Yellow Fever and vaccination requirements i.e. vaccination takes ten days to become effective.

23 October 2016

- Initial site visit delayed to allow time for vaccinations to become effective
- Initial assessment of project completed and Stephen Davy updated by Tammy Chu including:
 - Brief summary of project issues
 - Intention to use initial visit as a fact finding and data collection visit, with time on site to be limited to a maximum of ten days.

24 October 2016

- Tammy Chu met with staff travelling to Uganda to discuss the project and site visit.

31 October 2016

- Airport pickup by PowerChina Huadong arranged for Entura staff travelling to Uganda, plus provision of key contact details for PowerChina Huadong staff at Karuma HPP

10 November 2016

- Uganda country screening completed except for clarification regarding coverage by Hydro Tasmania's insurances
- Additional information sought regarding Hydro Tasmania's insurances
- Detailed screening of the project was finalised except for site observations from the initial site visit.

7-17 November 2016

- Initial site visit by two Entura engineers from 7-17 November 2016 to discuss the project.
 - Included observations of site practices, security and workplace safety.

16 November 2016

- Uganda country screening finalised with residual risk rating (i.e. with mitigation) of medium for Community, and Brand and Reputation criteria. Screening submitted to ET.

17 November 2016

- Detailed screening of the project was updated based on the site observations of Entura's engineers and submitted to ET.

Entura made a decision to proceed with the project based on:

- Karuma HPP was in its third year of construction.
- Feedback provided by Entura's engineers on the initial site visit including:
 - No obvious safety concerns in Uganda or the project area.
 - Construction camp is a secure compound with guards on each of the main gates, with nobody allowed to leave at night.
 - Some households were resettled for the construction and camp area. Resettlement of these households had been completed with no further relocations expected.
 - Safety gear is worn on site with normal expected safety practices observed.
 - Medical clinic located just outside construction compound.
 - Land clearance for the project is minimal as inundation area is small and most of the engineering components are located underground.
 - Lots of signs around the camp and construction about quality, safety, reputation, relationship building and community obligations.
- Acknowledgement of the project's high residual risk for Community, and medium residual risk for Infrastructure and Resources, Environment and Heritage, and Brand and Reputation criteria.
- The residual risk for Our People (i.e. focus on safety) was evaluated as low for both the project and country screening.
- To the extent there were societal (resettlement) issues, these occurred prior to Entura involvement.
- The safety of Entura's staff could be assured by applying Entura's/Hydro Tasmania's HSE management system and the advice of Dynamiq.
- Importance of our relationship with PowerChina Huadong to Hydro Tasmania's joint venture negotiations with PowerChina, in particular around our working relationship on projects.
- PowerChina Huadong was seeking support to ensure that the project met international design standards, so ensuring a reliable and safe project for Ugandans.
- The view that through our scope of works Entura had the ability to make a difference on the project by improving the standard of the design.

1.4 Ongoing assessment and monitoring

Two Entura staff conducted a second site visit in December 2016 to attend a design review meeting and were asked at the time by PowerChina Huadong to prepare a proposal for ongoing technical design support for the Karuma HPP.

Entura signed a contract with PowerChina Huadong to provide the ongoing technical design support for the Karuma HPP on 27 March 2017. Delivery of the project has included:

- Preparation of job hazard analyses (JHAs) prior to visiting the site.
- Provision and review of latest Dynamiq country and Riskline security reports to staff prior to travel.

- Briefing to staff prior to site visits, including safety.
- Seven visits to the site (as indicated in Figure 2.1) involving five Entura staff.
- Review of JHAs post trip to provide continuous improvement and allow additional potential hazards to be included and managed e.g. lack of smoke alarms and provision of portable smoke alarms to staff travelling to site.
- External safety audit of Entura's project as part of Hydro Tasmania's OHSAS 18001 recertification (20 September 2017).

During the site visits, no concerns were raised by staff regarding their safety on-site or that of other workers. Nor were any concerns raised prior to going to site from our previsit safety checks (Dynamiq country and Riskline security reports, staff reporting back on previous site visit). In addition, no safety concerns or incidents were raised in our correspondence with PowerChina Huadong.

The fatal security incident that occurred on-site in June 2018 occurred after our second last visit to the site. When Entura's staff were on-site in September 2018 there was no mention of the incident, nor was it mentioned in the Dynamiq country or Riskline security report provided prior to travel. Entura was unaware that it had occurred until it was raised by Dr Woodruff last week. During one of the site visits, an Entura engineer was informed of the death of a Chinese worker by a hippopotamus.

2. Specific issues raised by Dr Woodruff

In regards to the specific allegations raised by Dr Woodruff regarding the project:

- *“Some disturbing media reports document the Uganda People's Defence Forces routinely performing security checks on the some 6000 local workers at that project”*
 - Construction camp is located in a secure compound with guards on each of the main gates, with all vehicles entering and leaving the site checked.
 - Entura staff have observed workers entering and exiting the compound without being checked by the guards
- *“In June this year a worker was alleged to have been trying to smuggle unauthorised documents out, which led to a riot in which 20 workers were arrested and one was shot dead.”*
 - According to the police report that was obtained by Entura, after the above was raised:
 - *“On the fateful day of 25/06/2018 as a normal routine check of the workers returning for lunch aboard their buses and about six buses came in a convoy and the soldiers at the gate deployed themselves each to cover up one bus, in one of the buses one worker came out with a bag and immediately started running away, the soldier on duty suspected him carrying scrap chased him and he got arrested, he was brought back to where other workers were but incidentally these other workers now wanted forcefully to remove him from the soldiers, pushing down one soldiers by names of CPL Angudru as they wanted to remove the riffle from him and another soldier who then resisted prompting them to fire up some bullets trying to disperse them the worker was stealing material from the site.”*
 - *“a Safety Officer with Sino Hydro Project Karuma while on duty got shot by a stray bullet”*
- *“Do you know, for example, how many workers have died at the Karuma hydro power project since Entura started its involvement with Power China?”*
- *“there is allegations of unsafe working conditions and deaths at that construction mine [sic] and a whole range of serious accidents that have been occurring there”*
 - Entura does not have access to site safety records. We are not aware of any deaths occurring whilst Entura staff have been on site.
 - During a site visit, an Entura engineer was informed of the death of a Chinese worker by a hippopotamus early in the project before Entura was involved. This was advised as a safety warning.
 - Entura was unaware of the fatality in June 2018 until it was raised by Dr Woodruff in the GBE hearing.
 - A vehicle accident due to a mechanical issue occurred in August 2018 in an underground tunnel on site injuring 30 people with no fatalities. Entura only became aware of this incident as part this review.
 - Investigative journalism article by The Independent (Kampala) published online in December 2018 raised concerns about alleged deaths and accidents at the site. This article was published after Entura had completed its screening of the project. This is possibly the source of Dr Woodruff's allegations.

- *“these are alleged things that are happening in Uganda but we do need to find out what is going on. It does seem apparent that the Norwegian company that started the project in 1990 walked out of Uganda; they had a disagreement, a conflict with the World Bank. It has then gone to a process over the years where it hit a snag in 2010 and that snag was because of the fact that residents in the area of the proposed site were not informed about the pre-feasibility studies, the drilling. It was undertaken without their consent. There are issues that have happened in the years since about resettlement.”*
- *“There is a long history with this dam, well before Entura got involved. There is at least a 20-year history and it is peppered with conflicts, court cases, court injunctions, resettlement complaints, the lack of insurance that has been underwritten by the Ugandan government, huge holes and risks for that country and the people in the area.”*
- *“allegations of deaths, minister, resettlement of populations against their will”*
 - The issues raised in Dr Woodruff allegations occurred prior to Entura’s (and PowerChina’s) involvement in the project i.e. Norpak Energy left the project in 2009, pre-feasibility drilling occurred in 2010, resettlement was completed by the Ugandan Government in 2012.
 - Entura is unable to comment on the veracity of the allegations around the quality of the resettlement consultation process and action plan implementation.
- *“What sort of feasibility is really being undertaken when Entura goes into these sorts of projects overseas?”*
 - Entura undertook a screening to understand potential issues associated with the project which raised technical, environmental, human rights and safety issues. This screening identified measures, where possible, to mitigate the risks.
 - As the types of issues raised by Dr Woodruff occurred prior to Entura’s involvement, and, through our scope of works, Entura had the ability to make a difference on the project by improving the standard of the design, and timely approval of design to avoid delays in project completion Entura chose to engage on the project.

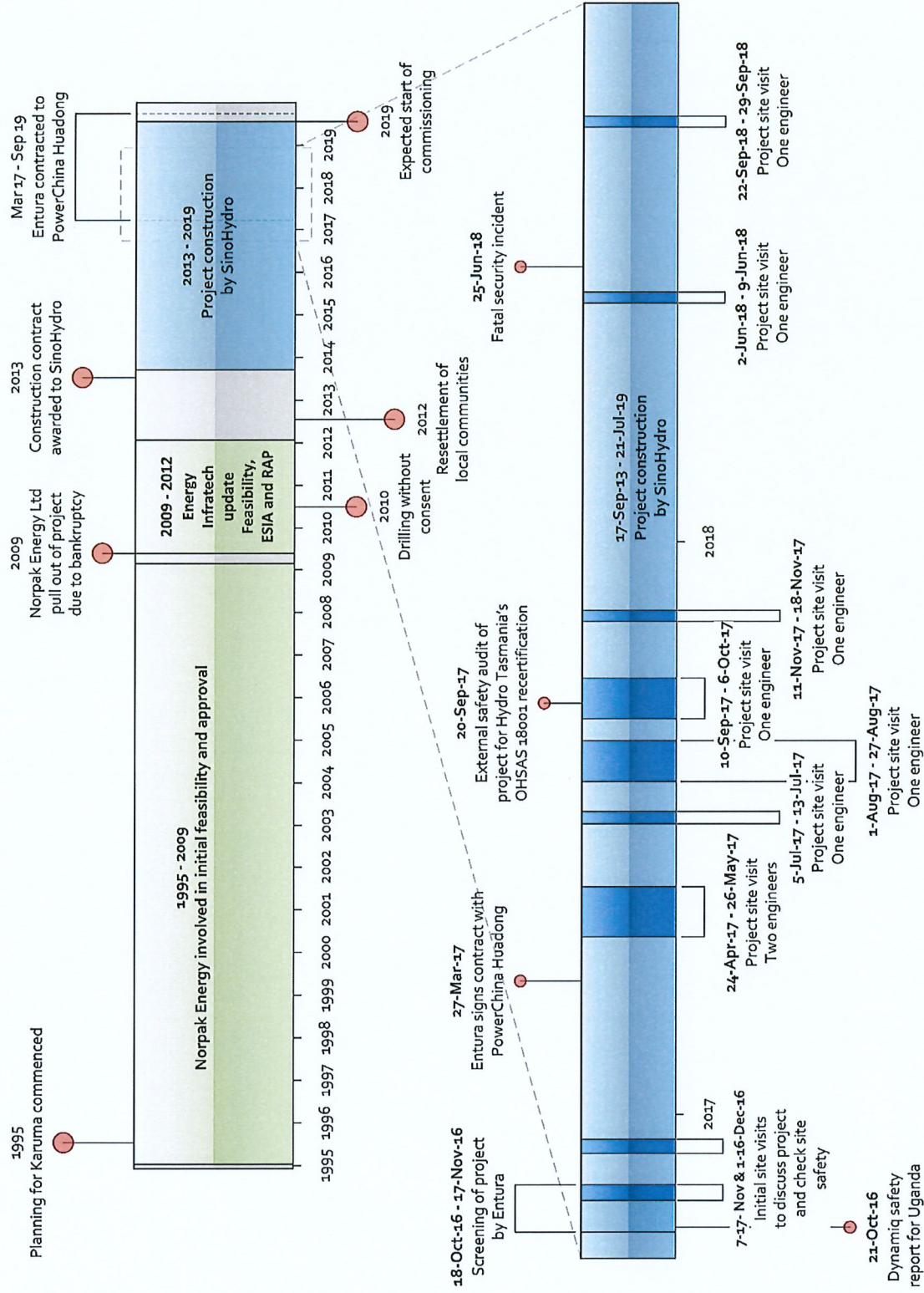


Figure 2.1: Entura's involvement in the Karuma HPP

**INTERNAL
BRIEFING REPORT**

Karuma Hydropower Project

13 December 2018

t/a Entura, Level 25, 500 Collins Street,
Melbourne VIC 3000 Australia

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Document information

Title	Briefing report Karuma Hydropower Project
Client organisation	Hydro Tasmania
Client contact	Stephen Davy
AdminDM no.	ENTADM-41DD6
Project Manager	Amanda Ashworth

Revision history

Revision 1.0

Revision description	Submitted		
Prepared by	Amanda Ashworth, Eleni Taylor-Wood, Tim Griggs		13 Dec 18
Reviewed by	Tammy Chu, Michael Howarth, Ajay Sharma		13 Dec 18
Approved by	Tammy Chu		13 Dec 18
	(name)	(signature)	(date)
Distributed to	Stephen Davy Cc: El Inglis; Sam Meyer	Hydro Tasmania	13 Dec 18
	(name)	(organisation)	(date)

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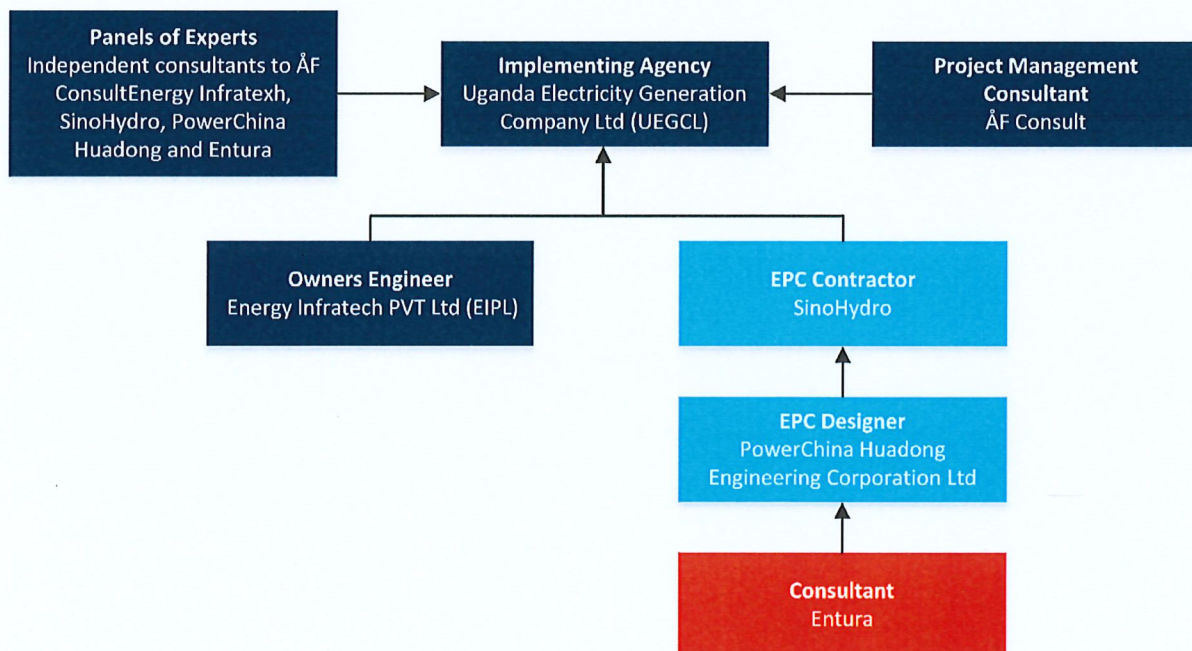


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A project timeline has been prepared outlining Entura’s involvement during construction of Karuma HPP (Figure 1.1).

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As Entura had not worked in Uganda or on Karuma HPP previously, a screening of Uganda and the project was requested by Tammy Chu. The decision to proceed with involvement in the project was made using a number of inputs including:

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- Country and project screening commenced.
- Assessment of project location within Uganda compare with DFAT advisories for the area.
- Feedback from staff based on a discussion with a colleague in AF Consult i.e. project in relatively safe area of Uganda, but project has some technical and other related issues.
- Discussions with staff proposed for the project site visit to assess their comfort level and willingness to travel to Uganda.

20 October 2016

- Discussion with EIPL General Manager at Karuma HPP regarding the project and site safety. EIPL described the site as safe but that there were some technical issues.
- Discussion with PowerChina Huadong regarding site safety, security and medical facilities on site.
- Initial screening of the Karuma HPP completed and evaluated as requiring a detailed screening based on high risk ratings on some criteria. Mitigation measures were identified to assess residual risk ratings.
- Proposal submitted to PowerChina Huadong for an initial site visit in late October/November 2016 and notice to proceed provided.

21 October 2016

- Summary of issues raised by the initial screening against Hydro Tasmania Sustainability Code was submitted to Entura's executive team (ET) on 21 October 2016 for initial evaluation.
 - prompted a request for additional information on site practices to be completed by the engineers visiting the site to discuss the proposed project.
- Request to Dynamiq to provide information on travelling in Uganda, in particular to the Karuma HPP site.
- Provision of Uganda Security Report by Dynamiq plus anecdotal observation by the Managing Principal, Dynamiq.

- Request to Dynamiq to provide information on Yellow Fever vaccination and time taken to gain effect.
- Stephen Davy notified of request by PowerChina Huadong to work on Karuma HPP and the proposed scope of works. A summary of the checks completed by Entura regarding project issues and safety was also provided, along with notification that a screening was being prepared.

22 October 2016

- Information provided by the Managing Principal, Dynamiq regarding Yellow Fever and vaccination requirements i.e. vaccination takes ten days to become effective.

23 October 2016

- Initial site visit delayed to allow time for vaccinations to become effective
- Initial assessment of project completed and Stephen Davy updated by Tammy Chu including:
 - Brief summary of project issues
 - Intention to use initial visit as a fact finding and data collection visit, with time on site to be limited to a maximum of ten days.

24 October 2016

- Tammy Chu met with staff travelling to Uganda to discuss the project and site visit.

31 October 2016

- Airport pickup by PowerChina Huadong arranged for Entura staff travelling to Uganda, plus provision of key contact details for PowerChina Huadong staff at Karuma HPP

10 November 2016

- Uganda country screening completed except for clarification regarding coverage by Hydro Tasmania's insurances
- Additional information sought regarding Hydro Tasmania's insurances
- Detailed screening of the project was finalised except for site observations from the initial site visit.

7-17 November 2016

- Initial site visit by two Entura engineers from 7-17 November 2016 to discuss the project.
 - Included observations of site practices, security and workplace safety.

16 November 2016

- Uganda country screening finalised with residual risk rating (i.e. with mitigation) of medium for Community, and Brand and Reputation criteria. Screening submitted to ET.

17 November 2016

- Detailed screening of the project was updated based on the site observations of Entura's engineers and submitted to ET.

Entura made a decision to proceed with the project based on:

- Karuma HPP was in its third year of construction.
- Feedback provided by Entura's engineers on the initial site visit including:
 - No obvious safety concerns in Uganda or the project area.
 - Construction camp is a secure compound with guards on each of the main gates, with nobody allowed to leave at night.
 - Some households were resettled for the construction and camp area. Resettlement of these households had been completed with no further relocations expected.
 - Safety gear is worn on site with normal expected safety practices observed.
 - Medical clinic located just outside construction compound.
 - Land clearance for the project is minimal as inundation area is small and most of the engineering components are located underground.
 - Lots of signs around the camp and construction about quality, safety, reputation, relationship building and community obligations.
- Acknowledgement of the project's high residual risk for Community, and medium residual risk for Infrastructure and Resources, Environment and Heritage, and Brand and Reputation criteria.
- The residual risk for Our People (i.e. focus on safety) was evaluated as low for both the project and country screening.
- To the extent there were societal (resettlement) issues, these occurred prior to Entura involvement.
- The safety of Entura's staff could be assured by applying Entura's/Hydro Tasmania's HSE management system and the advice of Dynamiq.
- Importance of our relationship with PowerChina Huadong to Hydro Tasmania's joint venture negotiations with PowerChina, in particular around our working relationship on projects.
 - Consider what role our relationship with PowerChina Huadong played in decision making. As discussed, it was only one of many factors, but it could be put to you that it was given undue weight.
- PowerChina Huadong was seeking support to ensure that the project met international design standards, so ensuring a reliable and safe project for Ugandans.
- The view that through our scope of works Entura had the ability to make a difference on the project by improving the standard of the design.

1.4 Ongoing assessment and monitoring

Two Entura staff conducted a second site visit in December 2016 to attend a design review meeting and were asked at the time by PowerChina Huadong to prepare a proposal for ongoing technical design support for the Karuma HPP.

Entura signed a contract with PowerChina Huadong to provide the ongoing technical design support for the Karuma HPP on 27 March 2017. Delivery of the project has included:

- Preparation of job hazard analyses (JHAs) prior to visiting the site.

-
- Provision and review of latest Dynamiq country and Riskline security reports to staff prior to travel.
 - Briefing to staff prior to site visits, including safety.
 - Seven visits to the site (as indicated in Figure 3.1) involving five Entura staff.
 - Review of JHAs post trip to provide continuous improvement and allow additional potential hazards to be included and managed e.g. lack of smoke alarms and provision of portable smoke alarms to staff travelling to site.
 - External safety audit of Entura's project as part of Hydro Tasmania's OHSAS 18001 recertification (20 September 2017).

During the site visits, no concerns were raised by staff regarding their safety on-site or that of other workers. Nor were any concerns raised prior to going to site from our previsit safety checks (Dynamiq country and Riskline security reports, staff reporting back on previous site visit). In addition, no safety concerns or incidents were raised in our correspondence with PowerChina Huadong.

The fatal security incident that occurred on-site in June 2018 occurred after our second last visit to the site. When Entura's staff were on-site in September 2018 there was no mention of the incident, nor was it mentioned in the Dynamiq country or Riskline security report provided prior to travel. Entura was unaware that it had occurred until it was raised by Dr Woodruff last week. During one of the site visits, an Entura engineer was informed of the death of a Chinese worker by a hippopotamus.

2. Specific issues raised by Dr Woodruff

The following discusses the specific allegations raised by Dr Woodruff regarding the project.

- As a reader, I'm still kind of wanting to know more about the facts regards what Rosalie Woodruff raised (not just Entura's involvement/knowledge of it).... If you get my drift?
- The dot points below are what I think the core issues Rosalie Woodruff was getting at. I think some of them could be teased out more in section 2 of your report. You could even re-structure section two into the below headings, rather than the selection of quotes? May make it easier to read? But I don't want to over-cook it – just a suggestion.

2.1 Reports of excessive worker security

- *"Some disturbing media reports document the Uganda People's Defence Forces routinely performing security checks on the some 6000 local workers at that project"*
 - Construction camp is located in a secure compound with guards on each of the main gates, with all vehicles entering and leaving the site checked.
 - According to the police report that was obtained by Entura after the fatal security incident (below) was raise by Dr Woodruff.
 - "the project site is under guard of UPDF soldiers, Police, Pinnacle security and HSE in all major entrances to the project area, all the gates are manned by the project security beefed up by the government forces."
 - Entura staff have observed workers entering and exiting the compound without being checked by the guards

2.2 Deaths on site, including shooting death of a worker six month ago

- *"In June this year a worker was alleged to have been trying to smuggle unauthorised documents out, which led to a riot in which 20 workers were arrested and one was shot dead."*
 - According to the police report that was obtained by Entura, after the above was raised:
 - "On the fateful day of 25/06/2018 as a normal routine check of the workers returning for lunch aboard their buses and about six buses came in a convoy and the soldiers at the gate deployed themselves each to cover up one bus, in one of the buses one worker came out with a bag and immediately started running away, the soldier on duty suspected him carrying scrap chased him and he got arrested , he was brought back to where other workers were but incidentally these other workers now wanted forcefully to remove him from the soldiers, pushing down one soldiers by names of CPL Angudru as they wanted to remove the riffle from him and another soldier who then resisted prompting them to fire up some bullets trying to disperse them the worker was stealing material from the site."
 - "a Safety Officer with Sino Hydro Project Karuma while on duty got shot by a stray bullet"

- “they carried him to the bus where he was rushed to the hospital but later pronounced dead”
- PowerChina Huadong was not aware of the incident.
- *“Do you know, for example, how many workers have died at the Karuma hydro power project since Entura started its involvement with Power China?”*
- *“there is allegations of unsafe working conditions and deaths at that construction mine [sic] and a whole range of serious accidents that have been occurring there”*
 - Entura does not have access to site safety records. We are not aware of any deaths occurring whilst Entura staff have been on site.
 - During a site visit, an Entura engineer was informed of the death of a Chinese worker by a hippopotamus early in the project before Entura was involved. This was advised as a safety warning.
 - Entura was unaware of the fatality in June 2018 until it was raised by Dr Woodruff in the GBE hearing.
 - A vehicle accident due to a mechanical issue occurred in August 2018 in an underground tunnel on site injuring 30 people with no fatalities. Entura only became aware of this incident as part this review.
 - Investigative journalism article by The Independent (Kampala) published online in December 2018 raised concerns about alleged deaths and accidents at the site. This article was published after Entura had completed its screening of the project. This is possibly the source of Dr Woodruff’s allegations.
 - **In regard to deaths on site, I note it says entura doesn’t have access to safety records, but can you see whats online/public?**
 - **Can we get the records? If not, can you say that? It just seems a little defensive.**
 - **As we know, neither Entura or PowerChina Huadong were made aware of the death on site, and (I believe) should have been. Worth considering what steps should / can be taken to improve communication across the various organisations providing services to the project, particularly where they relate to serious matters**

2.3 Terrible working conditions

- **(could have more)**

2.4 20 years of history

- *“these are alleged things that are happening in Uganda but we do need to find out what is going on. It does seem apparent that the Norwegian company that started the project in 1990 walked out of Uganda; they had a disagreement, a conflict with the World Bank. It has then gone to a process over the years where it hit a snag in 2010 and that snag was because of the fact that residents in the area of the proposed site were not informed about the pre-feasibility*

studies, the drilling. It was undertaken without their consent. There are issues that have happened in the years since about resettlement."

- *"There is a long history with this dam, well before Entura got involved. There is at least a 20-year history and it is peppered with conflicts, court cases, court injunctions, resettlement complaints, the lack of insurance that has been underwritten by the Ugandan government, huge holes and risks for that country and the people in the area."*
 - The issues raised in Dr Woodruff allegations occurred prior to Entura's (and PowerChina's) involvement in the project i.e. Norpak Energy left the project in 2009, pre-feasibility drilling occurred in 2010, resettlement was completed by the Ugandan Government in 2012.
 - *could have more – what, when, why, how much were we aware of*

2.5 Multiple court cases around unjust resettlement

- *"allegations of deaths, minister, resettlement of populations against their will"*
 - The issues raised in Dr Woodruff allegations occurred prior to Entura's (and PowerChina's) involvement in the project i.e. Norpak Energy left the project in 2009, pre-feasibility drilling occurred in 2010, resettlement was completed by the Ugandan Government in 2012.
 - Entura is unable to comment on the veracity of the allegations around the quality of the resettlement consultation process and action plan implementation.
 - *could have more – how did this happen, whats the status now, did we know about it, likely outcome?*

2.6 Robustness of Entura's feasibility study

- *"What sort of feasibility is really being undertaken when Entura goes into these sorts of projects overseas?"*
 - Entura undertook a screening to understand potential issues associated with the project which raised technical, environmental, human rights and safety issues. This screening identified measures, where possible, to mitigate the risks.
 - As the types of issues raised by Dr Woodruff occurred prior to Entura's involvement, and, through our scope of works, Entura had the ability to make a difference on the project by improving the standard of the design, and timely approval of design to avoid delays in project completion Entura chose to engage on the project.
 - *(could have more in section 2)*
 - *I think you could explain why the above wasn't captured in the feasibility report (i.e. did we not go back that far?), or if it was captured why we considered it manageable.*

3. Recommendations

- *we will need to understand what the requirement is to report back to Parliament (El can advise on this)*

- we should decide what steps – if any – we need to take to review / enhance our screening processes, as previously discussed. Any changes we do recommend should be included in the report back to Parliament.

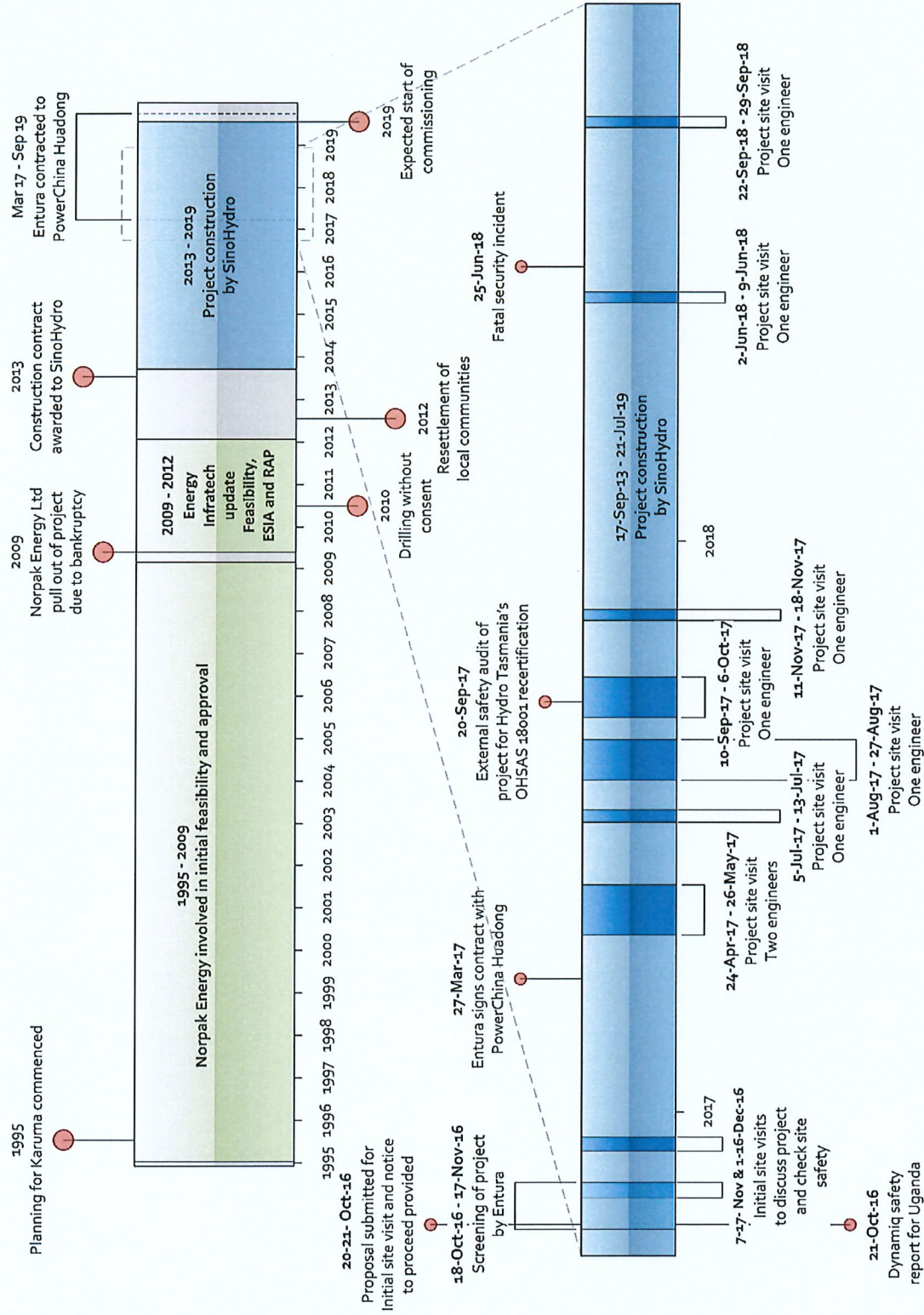


Figure 3.1: Entura's involvement in the Karuma HPP