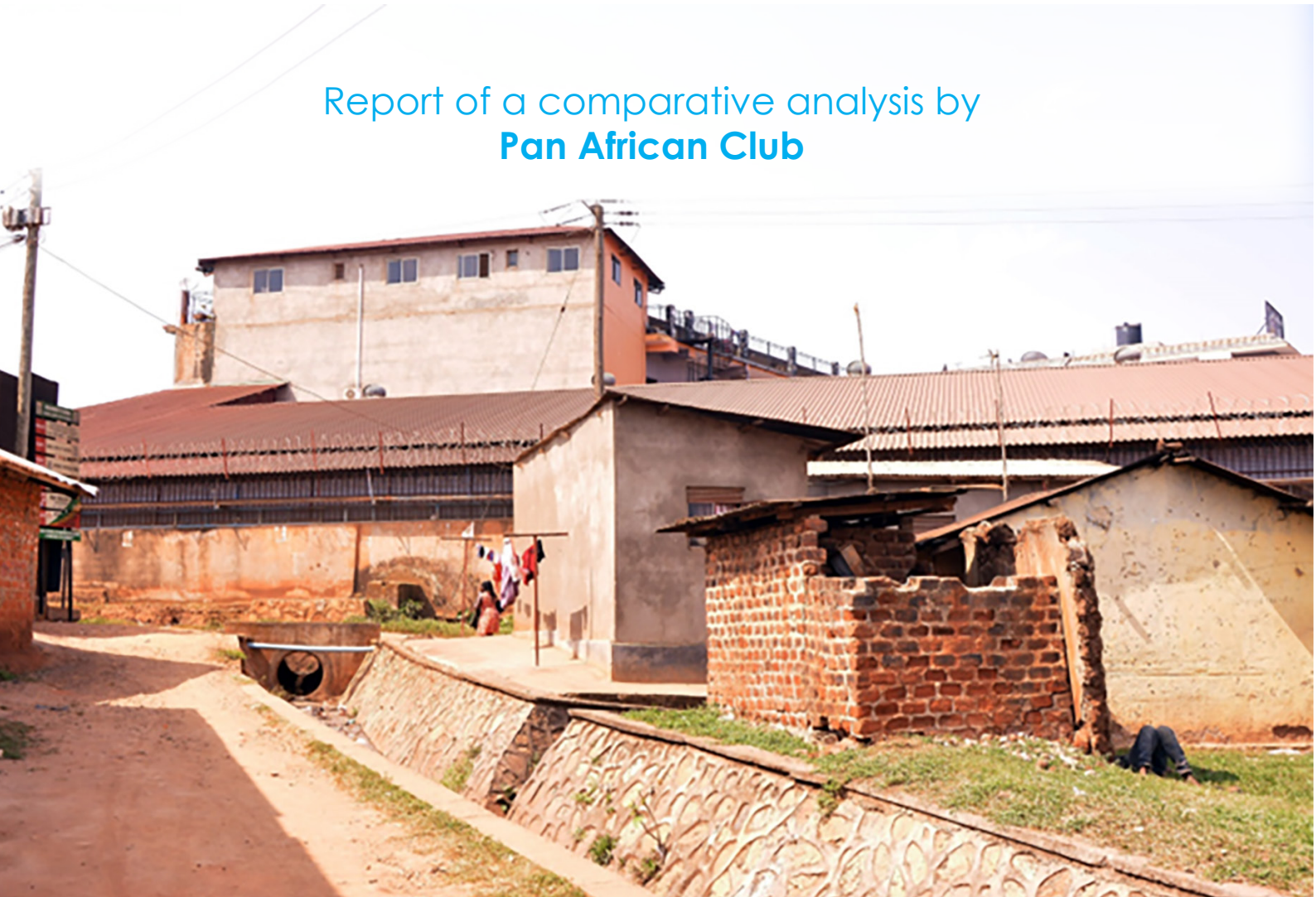


# HOLDING MANUFACTURING COMPANIES ACCOUNTABLE FOR POLLUTION IN KAWEMPE DIVISION - SCALE UP

**KCCA Budget trends and work plan comparing FY2023/2024  
and FY2024/2025 on financing environmental protection and  
implementing related activities in Kampala Capital City**

Report of a comparative analysis by  
**Pan African Club**



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## List of Acronyms

|      |   |
|------|---|
| CEAP | Civic Engagement Action Plan              |
| FY   | Financial Year                            |
| GKMA | Greater Kampala Metropolitan Area         |
| KCCA | Kampala Capital City Authority            |
| KII  | Key Informant Interviews                  |
| NEMA | National Environment Management Authority |
| PAC  | Pan African Club                          |
| PM   | Particulate Matter                        |
| PPE  | Personal Protective Equipment             |
| PWDs | Persons with disabilities                 |

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## Chapter 1: Introduction and Background

### 1.1 Introduction

Kampala is one of the cities with the highest levels of pollution. The Particulate Matter (PM) in Kampala exceeds the recommended annual air quality levels by 5 to 7 times according to KCCA data in 2021. The Lord Mayor of Kampala Erias Lukwago puts pollution by factories as one of the primary factors in causing these high levels of pollution. (Source: Kampala Capital City Policy Agenda by the Lord Mayor for Kampala 2024/2025). This comes at a time when KCCA does not have a functional institutional Air Quality Unit amidst growing community concern over pollution by factories. This has been worsened by inadequate budgetary allocation to manage the pollution problem in the city.

The 1995 Constitution and the KCCA Act mandate the Executive wing of KCCA led by the Lord Mayor to budget for the City with the technical input of KCCA's Executive Director. The annual budget is then presented to the Council for debate under the stewardship of the Speaker.

### 1.2 Background of the Analysis

In 2023, Pan African Club (PAC) produced a study report on budget allocation by KCCA to environmental conservation including fighting pollution in Kampala and made recommendations. In the present study, PAC is comparing last year's KCCA budget analysis with the current FY2024/2025 budget to identify trends of financing environmental protection and implementing related activities and make appropriate recommendations.

The aforementioned studies come at the backdrop of PAC's earlier studies conducted in 2022. These include: an evaluation of the activities of KCCA and NEMA to ensure that manufacturing companies do not contaminate wetlands in Kawempe division. In a separate study, PAC examined the effects of pollution by manufacturing companies on the surrounding communities in Kawempe division. In both studies, PAC made recommendations and shared them with various stakeholders. The affected communities petitioned KCCA in 2023 with the technical support of PAC using the CEAP Approach.

Overall, PAC found that the communities are trying to respond to the dangers of pollution but lack political commitment which is partly demonstrated in meagre resource allocation to environment protection including the fight against pollution by KCCA. It is against this background that in 2023, PAC carried out a budget review in regard to fighting pollution and related activities and made recommendations. Similarly, PAC thought that a comparative analysis of last year's budget allocation and planned activities with the budget of the current FY2024/2025 was necessary to identify the trends and make appropriate recommendations to KCCA and other stakeholders.

### **1.3 Structure of the Report**

This report has Four Chapters. **The first chapter** is the introduction and background. This chapter presents the state of pollution in Kampala pointing out the role of factories in escalating the problem. It also covers the background to the budget comparative analysis dating from 2022 when PAC carried out initial studies in Kawempe division about pollution and the interventions by KCCA and NEMA as the mandated statutory institutions.

**The second chapter** covers the methodology of the comparative analysis. This includes the desk review and key informant interviews (KII). The chapter also highlights the criteria of selection of the key informants.

**The third chapter** focuses on the findings accompanied with a detailed comparative analysis of FY2024/2025 and the previous FY2023/2024 in regard to environment protection. The analysis also takes into account the planned activities and outputs as well as the views of the intended beneficiary community members and other stakeholders particularly environmental activists and professionals.

**The fourth chapter** comprises of the observations, conclusions and recommendations to Stakeholders. Comprises of



## Chapter 2: Methodology for the Analysis

### 2.1 Introduction

PAC recruited a consultant who guided the analysis of the KCCA budget trends and the efforts to collect and process reliable data using reliable tools and methodologies.

PAC circulated a call for application of interested qualified persons to become PAC consultant/Facilitator. The recruitment criteria included:

- Qualifications
- Familiarity with the budget process of KCCA
- Experience in research
- Professional fees
- Familiarity with Pan African Club
- Knowledge of local language predominant in the project area
- Familiarity with the geographical project area

Upon confirming the best suited candidate, a contract was signed between Pan African Club and the recruited Lead Facilitator/Consultant. The Pan African Club then provided three qualified persons from among its members; two of whom were female and one was a male to back up the lead facilitator as research assistants. PAC management kept in close collaboration with the team to offer a strategic sense of direction and the necessary assistance.

### 2.2 Desk Review

During desk review, PAC sourced and examined various literatures from relevant government institutions such as the Ministry for Kampala and Metropolitan Affairs, Parliament of Uganda, KCCA, various CSOs and academic institutions.

### 2.3 Key Informant Interviews (KII)

PAC conducted Key Informant Interviews in communities affected by pollution from factories in Kampala to appreciate KCCA budget allocations and planned activities for FY2023/2024 in light of the pollution effects on surrounding communities.

PAC applied the strategy of Key Informant Interviews to enhance participation of relevant stakeholders such as officials at KCCA, elected leaders in Kampala especially Councilors, environmental activists, various professionals, local leaders and community members. The KIIs also deliberately targeted women leaders, the youths, PWDs, religious leaders and school administrators. This approach enabled PAC to gather a mix of qualitative and quantitative data which were critically analyzed and processed by the investigation team.

## **2.4 Selection Criteria of the respondents/Key Informants**

The research team adopted selective sampling of respondents for Key Informant Interviews based on the following:

- Being a participant in the KCCA budget process both from the technical wing and the political wing of KCCA
- Prioritization of grass root women, elders and persons with disabilities to ensure that their views which are often neglected are factored in the report.
- Living near or working in factories. This was to ensure that they had experienced or witnessed pollution and other human rights abuses by factories.
- Being a community leader in an area directly affected by the factory(s) in question.
- Renowned conservation activists whose track record of fighting pollution gives them a wealth of experience that would enrich the analysis report.

## Chapter 3: The Findings

### 3.1 KCCA Budget allocations in FY2024/2025 for environmental protection and implementing related activities

Vote 122 KCCA Approved Budget for the FY2024/2025

| Programme   | Sub Program                                  | KCCA Directorates / Department | Approved budget for FY2024/2025 (UGX) |
|---|--|--------------------------------|---------------------------------------|
| Natural Resources, Environment, Climate Change, Land and Water Management | Environment and Natural Resources Management | Environment Department         | 16,128,083,245                        |
|   | Land Management                              | Physical Planning              | 1,780,916,755                         |
|   |  | Land Management Unit           | 170,000,000                           |
| <b>Total</b>  | -  | -                              | <b>18,079,000,000</b>                 |

#### Projected outputs

| Budget in UGX  | Program   | Sub Program                   | Outputs  |
|----------------|---|-------------------------------|--|
| 18,079,000,000 | Natural Resources, Environment, Climate Change, Land and Water Management | Public Health and Environment | <ul style="list-style-type: none"> <li>Reduced noise pollution levels in Kampala</li> <li>200 amount of leachate treated and released to the natural environment</li> <li>5% (38,328 tons) of garbage recycled</li> <li>Kiteezi landfill maintained</li> <li>Decommissioning of Kiteezi landfill initiated</li> <li>547,500 tons of garbage collected from the city and properly disposed</li> <li>414 tarmac roads cleaned across all divisions (Salaries for casuals in the reservation scheme and PPE)</li> <li>10% level of operationalization of Dundu landfill</li> <li>Maintain key equipment, machinery and furniture</li> </ul> |
|                |   | Physical Planning &           | <ul style="list-style-type: none"> <li>Kampala Urban Forest</li> <li>Green the City by protecting wetlands and planting trees in strategic areas</li> </ul>  |



|  |  |                 |   |
|--|--|-----------------|---|
|  |  | Land Management | <ul style="list-style-type: none"> <li>• 7,500 trees planted across the city</li> <li>• 376,890 Sqm of the public green spaces maintained</li> <li>• National and City legislation on wetland preservation enforced</li> <li>• Beautification of Lubiri ring road, Kira Road Phase 1, Bombo road, Sezibwa road completed</li> <li>• Landscape designs for selected green corridors developed</li> </ul> |
|--|--|-----------------|---|

### 3.2 Comparative analysis of FY2024/2025 with the previous FY2023/2024 in regard to environment protection

**Stagnant KCCA budget allocation to environment sector:** The total budget for the environment sector and related activities for the present Financial Year remained the same as for the last Financial Year stuck at UGX 18,079,000,000. It should be noted that the KCCA Budget allocation direct to the environment sector for the FY2024/2025 was UGX 16,128,083,245 and this was the same amount that was allocated for the last FY2023/2024. The budget for related activities under the directorates of physical planning and land management also stood at 1,950,916,755 both in the FY2023/2024 and the FY2024/2025 leading to the total sum of 18,079,000,000 both for environment sector and related activities.

The overall government budget allocation to KCCA for the FY2023/2024 was 396,135,633,987 contrary to the KCCA Strategic Plan estimates of 1.8trillion. The KCCA budget allocation has been increased to UGX 1,041,291,054,323 (over 1 trillion shillings) in the present FY2024/2025. This implies an increment of over 250%.

One would have naturally expected that since Kampala is among the most affected cities in the world by pollution and climate change hazards such as floods, the increase of KCCA budget would have witnessed a corresponding increase in the budget allocation to the environment sector, but this did not happen. Instead, there was zero increase on the KCCA's budget allocation to the environment sector and this creates questions on the political commitment to protect the environment and fight climate change in Kampala Capital City.

KCCA Budget mismatch with its own Policy Agenda: Whereas KCCA in its policy agenda document authored by the Lord Mayor recognizes industrial pollution as one of the major causes of climate change in Kampala, none of the budget allocations and activity plans both for the FY 2023/2024 and the FY2024/2025 appear to directly address the industrial problem. This implies that the KCCA's ambition of making the city healthier and clean and improving the quality of life for all Kampala citizens as pronounced by the Authority's Executive Director Dr. Dorothy Kisaka may be still far from being achieved if pollution by industries is not tackled with conscious deliberate plan and precision.

**Positive aspects of continuity:** The activity plan of FY2024/2025 has some aspects that exhibit continuity of the initiatives started in the previous FY2023/2024. For example, according to vote performance report of FY2023/2024, the mapping for Kampala Urban Forestry and planning were completed in quarter 3 of the Financial Year. In the new FY2024/2025, the actual realization of the urban forest has been provided for in the budget. This is a positive aspect because it ensures continuity to achieve the objective. However, the above does not extend to other crucial areas of addressing environmental challenges as seen in the examples below:

**Budget Activity inconsistencies:** KCCA has been striving to establish a functional air quality unit. To this end, it purchased 50 additional air quality monitors in the FY2023/2024. However, in the current Financial Year, KCCA is quiet about air quality monitoring yet the city is littered with polluting factories and other pollutants such as old vehicles and poorly managed waste. This exhibits lack of sustained effort in a very crucial area of intervention.

Similarly, in the previous financial year, KCCA monitored compliance to environmental laws, regulations and policies for development applications in the city. One would have expected that since development in the city is continuous every year, the same item should have appeared in the current FY2024/2025. However, PAC investigators discovered that this is missing. This presents a challenge because development activities may take place in contravention of environmental guidelines when the officers at KCCA may be unable to enforce the guidelines due to lack of budget allocation.

The FY2023/2024 provided for environment conservation and KCCA reports indicate that 4 degraded biodiversity hotspots were marked, demarcated and restored as special conservation areas. However, in the vote performance report, these 4 are merely listed in figure but not named and hence it becomes difficult to verify their existence. In addition, there is no mention in the FY2024/2025 of monitoring of the said conserved biodiversity hotspot areas yet one would imagine that since they have a history of being degraded, they are vulnerable to the same if continuous monitoring is not done.

**Some improvement aspect in budget foresight:** On the other hand, one of the major aspects of good planning in the current FY2024/2025 is exhibited in the fact that KCCA has allocated a budget to pay casual workers who clean city roads. In the previous FY2023/2024, this had been omitted and PAC investigators raised a red-flag to that effect in its review report. No wonder, during the last financial year, casual city roads cleaners went on strike forcing KCCA to find a quick solution for the strike to be called off.

### **3.3 Communities' views about the KCCA budget and work plan trends in regard to environment protection in the City**

**Awareness and participation:** All grass-root community respondents reported lack of awareness and a call for participation in budget processes of KCCA. Most of the respondents expressed reservation in the budget activities of KCCA citing transparency issues leading to corruption.

**Attitude to KCCA:** Most community respondents did not have kind words for KCCA; they think that KCCA is an accomplice to pollution in the city arguing that the Authority approves plans of factories and other developments of the rich dubbed investors which are destroying the environment in violation of KCCA's own laws, regulations and policies.

**Pollution by factories:** Many community members believe that KCCA is aware of every factory that is established in densely populated areas and fragile ecosystem areas such as wetlands because they are the ones who issue them operation permits.

**Trust in KCCA:** When asked about KCCA's operational challenges due to underfunding and being low on staffing, most community members do not believe so. Instead, they believe that KCCA has no will to address problems of pollution related with factories in prohibited areas in the city due to corruption and interference from influential government offices commonly known as "powers from above".

## **Chapter 4: Key Observations, Conclusions and Recommendations**

### **4.1 Observations**

- Resource allocation to environmental protection: Resource allocation to the environment sector has not improved since last year yet environmental challenges are increasing due to spiraling pollution in the city. Fighting pollution sustainably is therefore an uphill task.
- Mismatch in key planning documents of KCCA: According to KCCA Policy Agenda for FY2024/2025, KCCA shall institutionalize air quality management by among other things establishing Air Quality Management Unit by the end of the last quarter of the financial year. It would also purchase of 150 Air Quality monitors under GKMA and develop and roll out a Mobile App for dissemination of Air Quality information by the end of the Financial Year. However, none of the above were provided for in the budget! This makes the fulfillment of the KCCA policy agenda quite challenging.
- Budget allocation to city divisions: As was the case in last financial year, the current FY2024/2025 did not allocate any budget to city divisions for environment protection. This implies that in the matrix of enforcing relevant environmental laws, policies and regulations, the City Divisions were left out yet they are closer to the areas where environmental degradation is taking place.
- Limited modernization: KCCA is putting commendable efforts in waste management in the city but it has continued to largely rely on old methods of waste management. One would have expected that in a modernizing city, one would see increasing integration of technology in waste handling such as deployment of e-waste management facilities.

Instead, the City Authority still relies heavily on open trucks to carry waste during the busy hours of the day creating air pollution in the dense population along their paths.

**Lack of community involvement:** Unlike the previous budget, the FY2024/2025 is silent on community engagement, empowerment and participation. This creates a fog on how KCCA intends to bridge the collaboration with the community and information gap regarding environmental laws, policies and regulations.

**Law enforcement:** Deliberate efforts have not yet been made to enforce laws effectively and sustainably against pollution. Law enforcement is budgeted but its impact not yet visible.

## 4.2 Conclusions

- **Prioritization:** It seems that environment protection is not yet a key priority to KCCA; when the budget of KCCA increased by over 250%, the budget allocation to the environment sector did not change.
- **Modernization:** Value addition investment to environment and natural resources products and services is still very low in KCCA. Environment operations in the city need to be modernized to realize benefits of value addition.
- **Pollution impacts:** Adverse per capita environmental impact appears to be high in the city due to challenges in ensuring better air quality and waste management practices.
- **Rule of law:** Enforcement of environmental laws, policies and regulations by KCCA remains weak due to underfunding and other institutional challenges such as priority setting and unfulfilled plans. The KCCA Act provides for a metropolitan police that would be expected to improve enforcement but this has never been put in place due to underfunding and prioritization factors.

- **Limited cooperation:** The itemization of activities in the budget documents that were availed to PAC investigators are broad statements without specific budget breakdown so as to properly assess value for money. This would easily be construed either as an oversight or a ploy to evade public accountability scrutiny.

#### 4.3 Recommendations

- **Continuity:** KCCA should strive to ensure continuity of environmental initiatives in successive annual budgets until the desired change is achieved.
- **Consolidation:** KCCA should make efforts to guard its achievements in the previous preceding financial years such as gazette biodiversity hotspot ecosystem areas so as to maintain and consolidate the achievements attained.
- **Consistency with KCCA Plans and Policies:** KCCA should strive to have a national budget that reflects its stated ambitions in the institution's various planning and policy documents such as KCCA Climate Change Action Plan, Air Quality Action Plan, and Annual Policy Agenda among others.
- **Community engagement:** KCCA should increase its efforts of community engagement in budget processes to address the information gap and strengthen collaboration to fight against pollution in the city.
- **Addressing industrial pollution:** KCCA should address industrial pollution with targeted interventions away from general antipollution measures because industrial pollution in Kampala is both an immediate health hazard as well as a major cause of climate change and therefore broad-based measures may not be effective enough to combat it.
- **Technology solutions:** The City Authority should increase integration of technology in its waste management in the city such as e-waste techniques. It is also prudent to use modern trucks to de-



escalate pollution that results in open old-type trucks that go spreading pollution along their paths during transportation of waste in the city.

- **Establishment of a functional Air Quality Unit:** In the next Financial Year, KCCA should endeavor to establish a functional Air Quality Unit so that the gains made over the years such as purchasing air quality monitors can be put to effective use.
- **Improved enforcement:** The government should institute Metropolitan Police with a special mission to combat environmental degradation in the city. In addition, KCCA should carry out more community empowerment on environmental laws, policies and regulations to ensure community policing to supplement the Metropolitan police because unlike the police, the community is spread everywhere at all times.
- **Addressing impunity:** KCCA and the government at large must address the challenge of impunity and budget indiscipline to instill trust and confidence in the people as strategic partners in ensuring environmental protection and fighting pollution in the city sustainably.

### **Annex 1: References**

- Kampala Capital City Policy Agenda for the F024/2025
- KCCA Budget documents for FY2024/2025 Y2
- PAC Budget review report of KCCA Budget allocations and planned activities for environmental protection in FY2023/2024
- KCCA Budget FY2023/2024 Performance Report
- Press statements by KCCA
- The Kampala Capital City (Amendment) Act 2019
- Environment And Social Safeguards Policy 2018
- National Environment Management Policy (NEMP) 1995
- Kampala Climate Change Action (KCCA) Strategy
- Kampala Clean Air Action Plan
- Kampala Disaster Risk and Climate Resilient Strategy 202/2021-2024/2025

## **Annex 2: Interview Guide for the analysis of KCCA budget and work plan trends comparing FY2023/2024 and FY2024/2025**

Date of Interview: .....

Interviewer's Name:

.....

### **SECTION A: QUESTIONS FOR KCCA OFFICIALS**

1. Name and Contact (optional)  
.....
2. Position of responsibility in KCCA (optional)  
.....
3. What is your role in the budgeting process of KCCA?  
.....
4. What is the budget process of KCCA?  
.....
5. What informs KCCA Budget priorities, how are they determined, who determines them?  
.....
6. What has been the impact of KCCA's 5-years strategic plan, KCCA policy agenda and other KCCA policies, laws and regulations on KCCA's budgeting processes?  
.....
7. What was the budget allocated to environment sector and related activities in the FY2024/2025?  
.....
8. What informed budget allocation to environment sector and related activities in the KCCA budget of FY2024/2025  
.....  
.....
9. How do you compare the two Financial Years of 2023/2024 and 2024/2025 in regard to financing environment conservation and related activities  
.....
10. What changes would you like to see in the KCCA budget allocations to environment protection and related activities?  
.....
11. What are your general comments?  
.....

.....

**SECTION B: QUESTIONS TO KEY INFORMANTS FROM ACTIVISTS AND PROFESSIONALS**

1. Name (optional):

.....

1.2 Sex: Male  Female

1.3 Position/responsibility:

.....

1.4 Contact (optional):

.....

2.0 Are you familiar in any way with KCCA budgeting process?

.....

3.0 Are you aware of KCCA budget allocated to environment conservation and related activities?

.....

4.0 Have you ever involved in KCCA's budget process as a public participant?

.....

5.0 What are your views about KCCA's budget allocation to environment protection and related activities in FY2024/2025? How do you compare them with FY2023/2024?

.....

6.0 What issues in FY 2024/2025 and other challenges are you aware of that are constraining KCCA to ensure that manufacturing companies do not pollute wetlands and the surrounding communities in Kampala?

.....

7.0 What recommendations would you like to give KCCA regarding their mandate of ensuring that factories do not pollute wetlands and the surrounding communities in Kampala?

.....

8.0 What key interventions do you think should be put in place to ensure that manufacturing companies do not pollute wetlands and the surrounding communities in your area and Kampala as a whole in the next FY 2025/2026?

.....

9.0 What are your general comments?

.....

**SECTION C: QUESTIONS TO KEY INFORMANTS TARGETING  
GRASSROOT COMMUNITY MEMBERS**

1. Name (optional):

.....

1.2 Sex: Male  Female

1.3 Ward.....

Parish.....

Position/responsibility:

.....

2. Have you ever participated in any activity related with KCCA budgeting process? ..... If yes, what was the nature of your participation?

.....

3. Are you aware of KCCA' Budget allocation to environment conservation and any related activities?

4. What is KCCA doing to stop manufacturing companies from polluting wetlands and the surrounding communities in:

(a) Your area?

.....

(b) Kampala as a whole?

.....

5. Are you aware of any KCCA plan to conserve the environment and fight pollution in your area in the current financial year?

.....

6. What are your advice to KCCA in regard to budget allocations to environment protection and fighting pollution in your area?

.....

***Thank you for your cooperation!***



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