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UGANDA

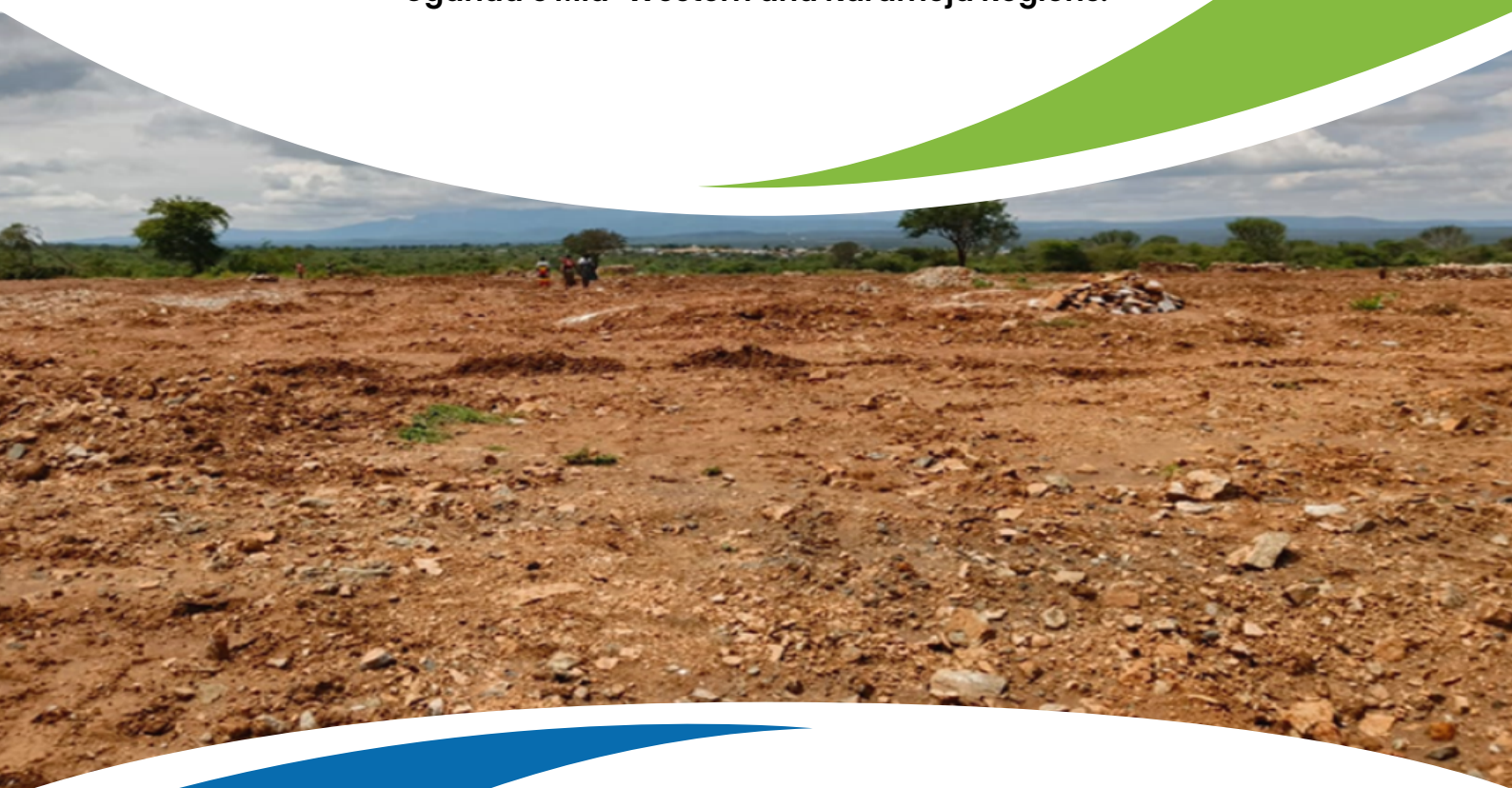


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Bi-Annual Risk Assessment Report October 2023 – March 2024

Land and Environmental Human Rights Violations in
Uganda's Mid-Western and Karamoja Regions.



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Map of Uganda Showing Project regions of operation

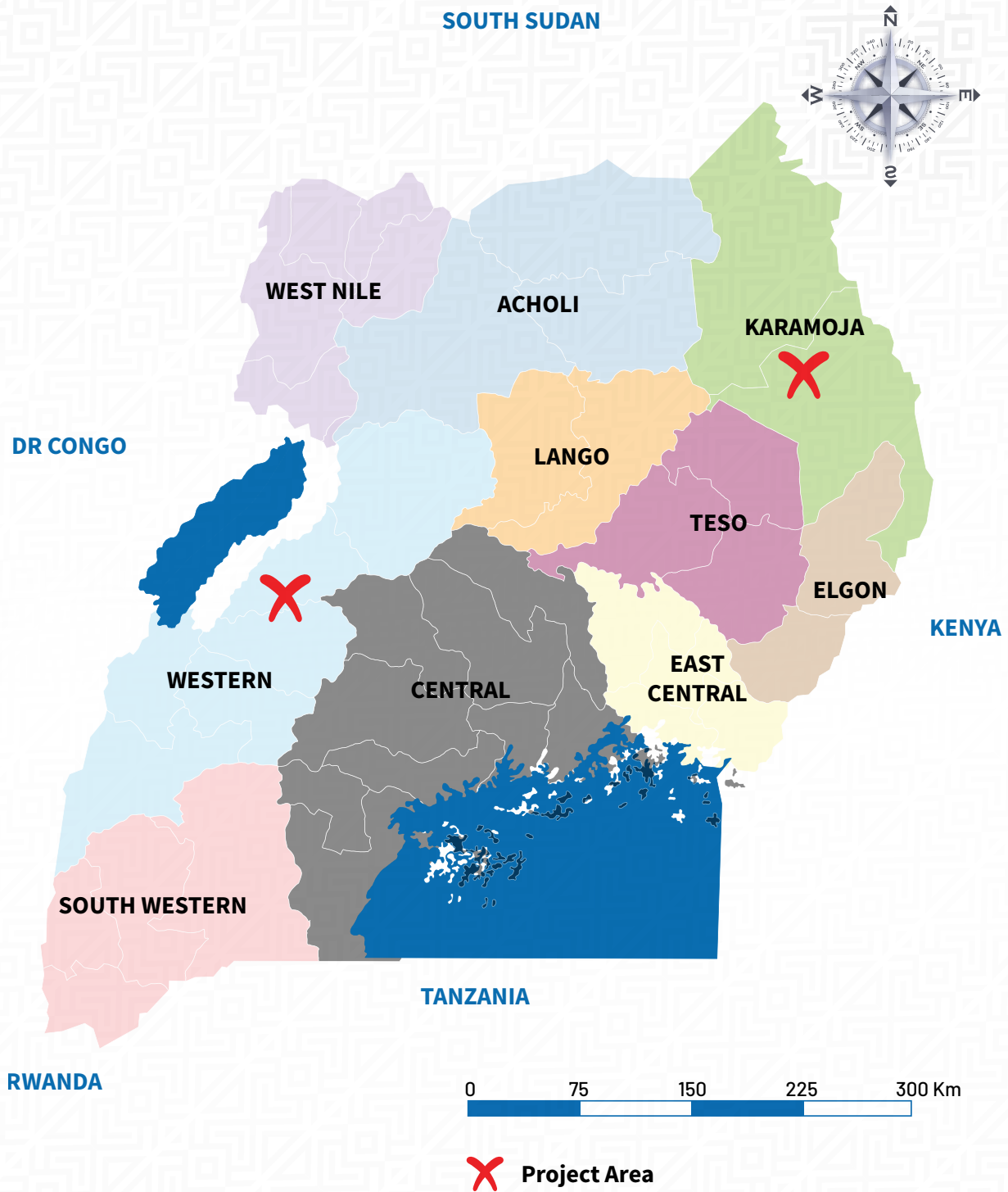


Fig 1: Map of Uganda showing the project areas

List of acronyms

CSOs	Civil Society Organisations
DCA	DanChurchAid
EACOP	East African Crude Oil Pipeline
EIAs	Environmental Impact Assessments
ESIAs	Environmental and Social Impact Assessments
EU	European Union
FGDs	Focus Group Discussions
FPIC	Free, Prior, and Informed Consent
GESI	Gender Equality and Social Inclusion
HRD	Human Rights Defender
HRVs	Human Rights Violations
KII	Key Informant Interviewskin
LBI	Large Business Investment
LDIs	Land-Dependent Investments
LED	Land and Environmental Defender
LSLAs	Large-scale land acquisitions
MDA	Monitoring, Documentation, and Advocacy
NAPBHR	National Action Plan on Business and Human Rights
NCHRD-U	National Coalition of Human Rights Defenders – Uganda
PAPs	Project Affected Persons
POMA	Public Order Management Act
RAs	Research Assistants
ULS	Uganda Law Society
UNGDPs	UN Guiding Principles on Business and Human Rights
UN	United Nations
UPDF	Uganda People's Defense Force
UPF	Uganda Police Force
WR	Witness Radio

Glossary of Terms

Abuse: Misuse of authority or power by state or non-state actors, causing oppression or harm, especially targeting those advocating for land and environmental rights.

Arbitrary Arrests: Detentions lacking due legal process, often targeting activists to disrupt advocacy activities.

Corporate Accountability: Obligation of businesses to uphold human rights, including preventing and addressing harmful impacts of their operations.

Criminalization of Activism: Wrongful use of laws to portray legitimate advocacy as criminal activity, often involving fabricated charges against activists.

Cyber Threats and Surveillance: Use of digital technologies by state or non-state actors to intimidate, monitor, threaten, or silence activists.

Displacement: Forced removal of individuals or communities from their traditional land or homes, often without fair compensation or adequate notice.

Economic and Social Isolation: Deliberate restriction of defenders' access to economic resources and social networks to weaken advocacy efforts.

Environmental Degradation: Harmful deterioration of ecosystems due to unsustainable activities like deforestation, pollution, and extractive industries.

Forced Evictions: Removal of people from land or homes without adequate consultation, notice, compensation, or due legal process.

Free, Prior, and Informed Consent (FPIC): Internationally recognized principle requiring consent from communities, especially indigenous peoples, before projects affecting their lands and rights begin.

Gender-Based Violence (GBV): Harmful acts targeting individuals based on their gender, disproportionately impacting women defenders in advocacy contexts.

Harassment: Persistent and unwanted behaviour intended to disturb, intimidate, or undermine activists' work and personal lives.

Human Rights Defenders (HRDs): Individuals or groups actively promoting and protecting universally recognized human rights, often at personal risk.

Intimidation: Acts intended to instil fear or suppress advocacy activities among activists and community members.

Judicial Harassment: Abusive use of legal systems to intimidate or silence activists through unfounded charges, prolonged trials, and arbitrary detention.

Land and Environmental Defenders (LEDs): Community members, activists, or local leaders advocating against land dispossession, environmental destruction, and resource exploitation.

- Land-Based Investments (LBIs):** Projects involving large-scale commercial land use, such as mining, agriculture, and infrastructure, often associated with displacement and environmental harm.
- Land-Dependent Investments (LDIs):** Investments requiring substantial land allocation, frequently resulting in community displacement, environmental damage, and socio-economic disruption.
- Large-Scale Land Acquisitions (LSLAs):** Major land purchases by corporations or governments often resulting in displacement of communities and significant ecological impacts.
- Militarization of Land Disputes:** Deployment of military or security forces in land conflicts, often escalating violence and abuses against communities and defenders.
- Perpetrators:** Individuals or entities, including state and private actors, responsible for committing human rights abuses and violations.
- Project-Affected Persons (PAPs):** People negatively impacted by infrastructure or investment projects through displacement, livelihood loss, or social disruption.
- Public Order Management Act (POMA):** Ugandan law often used to restrict freedoms of assembly, association, and expression, disproportionately affecting activists and protesters.
- Risks:** Actual or potential harm faced by HRDs and LEDs due to their advocacy, including physical, legal, psychological, and financial threats.
- Threats:** Explicit or implied actions intended to intimidate, harm, or silence human rights defenders and environmental activists.
- Violations:** Acts infringing on human rights, including forced evictions, arbitrary detention, violence, destruction of property, and denial of justice

1.0 Executive summary

This First Bi-Annual Human Rights Risk Assessment Report (October 2023–March 2024) establishes a comprehensive risk baseline for Human Rights Defenders (HRDs) and Land and Environmental Defenders (LEDs) in Uganda's Mid-Western and Karamoja regions. Conducted under the EU funded Monitoring, Documentation and Advocacy (MDA) project—implemented by NCHRD-U, Witness Radio Uganda and DanChurchAid—this assessment identifies, quantifies and prioritizes the principal human rights and environmental risks arising from land-based investments, extractive operations, pipeline development and agribusiness expansion.

Methodology & Limitations

- Qualitative data drawn from 50 Key Informant Interviews and four Focus Group Discussions, supplemented by documentary review and field observations.
- Delayed rollout of standardized documentation tools constrained early quantitative trend analysis, though intensified training and tool deployment from January 2024 improved data consistency.
- Inadequate initial geospatial casetracking limited hotspot mapping; planned integration of GIS protocols will address this in subsequent cycles.

Key Risk Findings

- Displacement Risk: Forced evictions surged in March 2024, with ~2,500 residents removed from Kapapi Village (Hoima District) without consultation or adequate compensation, precipitating acute food security and tenure insecurity threats.
- Judicial Backlash Risk: Eleven EACOP campaigning HRDs were arbitrarily arrested and detained in January 2024, revealing a systematic pattern of judicial harassment designed to deter advocacy.
- Personal Security Risk: High-profile LEDs—including Anna Lomonyang—faced sustained threats, surveillance and harassment between November 2023 and March 2024, evidencing an environment of pervasive intimidation.
- Gendered Vulnerability: Women defenders reported disproportionate physical violence, exclusion from compensation negotiations and significant barriers to legal redress.
- Environmental Contamination Risk: Mining and oil-related pollution incidents compromised water sources and agricultural lands in both regions, heightening livelihood and health hazards.

Strategic Recommendations & Next Priorities

- Strengthen legal frameworks: Align Uganda's land tenure laws with FPIC and EU Due Diligence standards; expedite the passage of the National Action Plan on Business and Human Rights.
- Scale rapid response protection: Expand USSD/ GIS enabled risk mapping, safe house networks and emergency legal aid rosters to frontline HRDs.
- Enhance capacity building: Deliver targeted training on digital security, evidence collection and trauma informed support, prioritizing remote area accessibility.
- Institutionalize accountability: Establish independent data verification bodies, mandate quarterly public risk-monitoring reports and integrate multi-stakeholder review panels.
- Secure sustainable financing: Advocate for multiyear funding commitments to underpin monitoring platforms, psychosocial services and emergency reserves.

This baseline assessment not only documents the severity and scope of evolving risks, but also charts a clear roadmap for the MDA project's ongoing monitoring, community empowerment and strategic interventions—ensuring that defenders operate in safer, more accountable environments.

2.0 Introduction

2.1 Purpose of the Risk Analysis Report

Uganda's rapid surge in landbased investments—spanning extractive industries, agribusiness, infrastructure and the East African Crude Oil Pipeline (EACOP)—has amplified human rights and environmental risks in the MidWestern and Karamoja regions. These activities routinely override customary land tenure, trigger largescale displacement, undermine livelihoods and stifle community participation. Frontline Human Rights Defenders (HRDs) and Land and Environmental Defenders (LEDs) who document and resist these abuses now confront escalating threats, from judicial harassment to physical violence and surveillance.

This Bi-Annual Risk Analysis Report (October 2023–March 2024), commissioned under the EU funded Monitoring, Documentation and Advocacy (MDA) project and implemented by NCHRD-U, Witness Radio Uganda and DanChurchAid, systematically identifies and prioritizes these evolving risks. Aligned with the MDA Terms of Reference, it establishes an evidence-based foundation for continuous monitoring, targeted mitigation and strategic advocacy to safeguard defenders and affected communities.

2.2 Objectives of the Report

This report is designed to:

1. Systematically identify, document and analyze the principal risks faced by HRDs and LEDs defending land and environmental rights in MidWestern and Karamoja.
2. Map historical and emerging trends in forced evictions, environmental degradation and associated rights violations to inform future assessments.
3. Quantify the direct impacts of Land-Based Investments (LBIs)—including livelihood disruptions, displacement and ecological harm—on local populations.
4. Detail the spectrum of threats to HRDs and LEDs: physical violence, threats, judicial harassment, criminalization and digital surveillance.
5. Assess the adequacy of existing legal and policy frameworks (e.g. FPIC, NAPBHR), pin-pointing gaps that hinder the protection of defenders.
6. Provide clear, actionable, evidence driven recommendations for Civil Society Organizations, government bodies, international donors and private sector actors to reinforce risk mitigation, accountability and compliance with international human rights standards.

2.3 Scope of the Report

2.3.1 Geographic Scope

- MidWestern Uganda: Hoima, Kikuube, Buliisa, Masindi, Kiryandongo, Kagadi, Kakumiro, Kyegegwa and Kyenjojo districts—impacted by oil exploration, the EACOP corridor and agribusiness expansion.
- Karamoja: Moroto, Kotido, Kaabong, Karenga, Abim, Napak, Nabilatuk, Amudat and Nakapiripirit districts—affected by mining concessions, land acquisitions and militarized evictions.

2.3.2 Thematic Scope

- Forced evictions, displacement patterns and land dispossession drivers.
- Roles of corporate investors, state security agencies (UPDF, UPF) and political elites in perpetuating rights abuses.
- Analysis of legal and policy frameworks, highlighting enforcement deficits and procedural gaps.
- Specific risks to HRDs and LEDs: intimidation tactics, criminalization, judicial harassment and surveillance.
- Environmental degradation impacts from LBIs, including pollution, deforestation and habitat loss.
- Community resilience and grassroots advocacy strategies mobilized to resist violations and demand redress.

2.3.3 Temporal Scope

This Bi-Annual Risk Analysis covers October 2023–March 2024 and serves as the first in a series of MDA project reports, establishing baseline indicators for subsequent monitoring cycles.

2.3.4 Rationale for Risk Monitoring

Systematic risk monitoring is essential to:

- Anticipate and preempt threats to HRDs and LEDs by reinforcing legal, financial and emergency response mechanisms.
- Strengthen corporate accountability through enforcement of Due Diligence, FPIC and environmental standards.
- Empower communities to mobilize for sustainable land governance, climate justice and

equitable development.

- Inform dynamic advocacy strategies that drive policy reform, institutional oversight and multistakeholder engagement.

By documenting key trends, mapping hotspots and analyzing evolving threats, this report underpins strategic interventions to protect and advance land and environmental rights in Uganda.

3.0 Methodology

3.1 Introduction

This First Bi-Annual Risk Assessment Report adopts a qualitative methodology to examine land and environmental human rights risks in Uganda's Mid-Western and Karamoja regions. Undertaken as part of the Monitoring, Documentation, and Advocacy (MDA) project, the assessment is designed to serve as a baseline for tracking the nature and scale of risks affecting Human Rights Defenders (HRDs) and Land and Environmental Defenders (LEDs). This foundational analysis was guided by the project's Terms of Reference (ToR), focusing on the intersection of land-based investments (LBIs), extractive industries, and human rights concerns, while integrating Gender Equality and Social Inclusion (GESI) dimensions throughout.

3.2 Data Collection

Primary data was collected through Key Informant Interviews (KIIs) and Focus Group Discussions (FGDs), targeting HRDs, local authorities, traditional leaders, CSO representatives, and community members. The selection of respondents was guided by their lived experience and active involvement in land and environmental justice issues. In total, 50 HRDs from both regions were interviewed, complemented by four FGDs (two per region), allowing for triangulation of perspectives. Secondary data sources included progress reports, media articles, and commissioned studies such as the MDA Baseline Report, providing contextual depth to the findings.

3.3 Sampling Strategy

A purposive sampling approach was employed, coordinated in consultation with the National Coalition of Human Rights Defenders–Uganda (NCHRD-U) and Witness Radio. Participants were identified based on their direct or indirect engagement in land governance, environmental activism, or human rights advocacy. The sampling strategy ensured regional balance and inclusion of diverse voices, including women defenders and representatives from Indigenous communities. FGDs were designed to foster dialogue across stakeholder groups and provide nuanced insight into recurring risks and patterns.

3.4 Field Preparation and Data Collection Process

Introductory letters were shared with relevant district authorities ahead of fieldwork to facilitate community entry. Field teams—comprising experienced researchers and Research Assistants (RAs)—used open-ended interview guides to elicit narratives and testimonies. The process was supported by continuous quality checks, real-time adaptations, and centralized supervision to ensure consistency, completeness, and data validity.

3.5 Data Analysis

The qualitative data collected was transcribed, coded, and thematically analysed using structured Excel sheets. Triangulation was applied by cross-verifying data across KIIs, FGDs, and secondary literature to enhance credibility. Themes were categorized under key areas including land dispossession, criminalization, state-corporate collusion, environmental impacts, and community resistance. These themes informed the formulation of findings, conclusions, and recommendations.

3.6 Ethical Considerations and Informed Consent

Ethical research protocols were strictly adhered to throughout the data collection process. All participants were informed about the purpose of the research, their right to confidentiality, and how the information would be used. Oral and written consent was obtained before proceeding with interviews or discussions. To protect the safety and identity of respondents, anonymization was applied to all personal data.

3.7 Limitations

This report recognizes several methodological and contextual limitations:

- **Late initiation of the MDA project:** At the time of assessment, the project's field activities and documentation systems had only recently commenced, resulting in a narrow evidence base for long-term trend analysis.
- **Incomplete HRD reporting and self-censorship:** Many HRDs were unable to provide detailed accounts of violations due to lack of proper documentation at the time incidents occurred, and fears of retaliation led to self-censorship in several cases.
- **Organizational constraints:** During the review period, NCHRD-U's regional structures were not fully functional, leading to delays in incident verification and follow-up documentation.
- **Time lag and retrospective recall:** Most violations reported occurred several months prior to data collection, limiting the precision of recall and compromising case detail in some instances.
- **Access to informants:** Government administrative procedures delayed access to certain officials, and scheduling challenges reduced the diversity of viewpoints captured, particularly in remote areas.

Despite these limitations, the report represents a credible starting point for ongoing risk tracking. It establishes a baseline for comparison with subsequent reports and provides actionable insights to guide the next phases of the MDA project.

4.0 Background and Context

4.1 Global and Regional Overview of Land and Environmental Conflicts

Across the world, HRDs and LEDs operate under mounting pressure as extractive industries, large-scale agriculture, infrastructure projects and climate impacts converge to displace communities and erode traditional livelihoods. Global Witness (2024) reports at least 196 defenders killed in 2023, with Latin America and Africa bearing the greatest losses—an extreme manifestation of the risks faced when challenging powerful corporate and state actors over contested land and resources.

In Africa's resource-rich zones, national governments frequently facilitate large-scale land acquisitions (LSLAs) for private investors, often bypassing local consent. Militarized dispute resolution, judicial harassment of defenders and mass evictions are on the rise. Although international instruments—such as the UN Guiding Principles on Business and Human Rights (UNGPs) and the EU's Corporate Sustainability Due Diligence Directive (CS3D)—set standards, uneven enforcement perpetuates a cycle of abuse in jurisdictions with weak legal safeguards and fragile institutions.

4.2 Land and Environmental Conflicts in Uganda

Uganda reflects this global pattern: accelerated oil exploration, the East African Crude Oil Pipeline (EACOP), mineral extraction and agribusiness expansions have intensified land disputes, environmental damage and community displacement in Mid-Western and Karamoja regions. Key documented violations include:

- Forced evictions without fair compensation or consultation.
- Militarized enforcement by UPDF and UPF, accompanied by violence and intimidation.
- Judicial harassment of HRDs and LEDs via arbitrary arrests and protracted legal proceedings.
- Systematic disregard for Free, Prior and Informed Consent (FPIC) in project planning.
- Marginalization of women and indigenous groups, who face higher barriers to justice and decisionmaking.

A regulatory vacuum—marked by weak enforcement of customary land rights and environmental protections—leaves defenders exposed to reprisals whenever they challenge entrenched interests.

4.3 Corporate Involvement and Its Impact on HRDs in Uganda

Corporate entities in oil, mining and industrial agriculture are principal drivers of human rights risk. Many operate in collusion with local officials and under the cover of state security, employing threats, surveillance and forced displacements to suppress dissent. Interviews with defenders reveal patterns of intimidation designed to derail investigations and silence advocacy.

In response, the EU funded MDA project—implemented by DCA, NCHRD-U and Witness Radio—provides targeted training, enhances reporting channels and conducts joint advocacy to hold corporations to account under UNGPs and Uganda's National Action Plan on Business and Human Rights (NAPBHR).

4.4 Uganda's Situation in a Broader Context

Uganda's experience parallels trends across East Africa—Tanzania, Kenya, South Sudan and DRC—where economic priorities override community and environmental rights. The EU's strategic engagement via MDA underscores a commitment to inclusive land governance: NCHRD-U's training in digital security and documentation has equipped dozens of defenders to document abuses, pursue legal remedies and mobilize local advocacy.

This first Bi-annual risk assessment establishes a critical baseline, situating Uganda's struggles within regional

and global contexts and informing coordinated, evidencedriven interventions.

4.4.1 Key Drivers of Land and Environmental Conflicts in Uganda

Table 1: Several structural and political factors contribute to escalating land and environmental disputes.

Type of violation	Effects
1. Large-Scale Land Acquisitions and Land Grabbing	<ul style="list-style-type: none"> Expansion of oil exploration in the Albertine Graben, the East African Crude Oil Pipeline (EACOP), and mining in Karamoja has resulted in forced evictions and loss of communal land rights (DCA, 2024). Commercial sugarcane plantations have encroached on forest reserves, including Bugoma Forest, displacing thousands of households (Witness Radio, 2024).
2. Weak Legal Protections for Customary Landowners	<ul style="list-style-type: none"> Over 80% of land in Uganda is under customary tenure, yet weak land tenure protections make communities vulnerable to land dispossession and illegal evictions (Land Act Cap 227).
3. State-Sponsored Evictions and Criminalization of Activism	<ul style="list-style-type: none"> State security forces have been implicated in violent evictions, particularly in Karamoja, where the military has been used to displace communities for mining projects (Front Line Defenders, 2024). HRDs and LEDs opposing land grabs have been arrested, harassed, and, in some cases, subjected to extrajudicial killings (Global Witness, 2024).
4. Environmental Degradation and Climate Change	<ul style="list-style-type: none"> Deforestation, wetland encroachment, and toxic pollution from mining and oil operations threaten biodiversity and food security (National Environment Management Act, 2019).

4.4.2 Uganda's Legal and Institutional Framework for HRDs, Land, and Environmental Rights

Uganda has several legal provisions aimed at protecting land rights and environmental defenders, yet gaps in enforcement continue to fuel land-related conflicts.

Table 3: Constitutional Protections for Land and Environmental Rights

Laws	Supporting acts
The 1995 Constitution of Uganda provides a foundation for land and environmental rights:	<ul style="list-style-type: none"> Article 26: Protects the right to property and compulsory land acquisition rules. Article 39: Guarantees the right to a clean and healthy environment. Article 237: Recognizes customary land ownership and the rights of landowners. Article 245: Mandates environmental protection and conservation measures.
Key Land and Environmental Laws	Land Act Cap 227 (as amended) <ul style="list-style-type: none"> Governs land tenure, administration, and dispute resolution. Provides for the establishment of District Land Boards and Land Tribunals.
National Environment Act, 2019	<ul style="list-style-type: none"> Strengthens environmental protection mechanisms. Introduces mandatory Environmental and Social Impact Assessments (ESIAs).
Wildlife Act, 2019	<ul style="list-style-type: none"> Protects wildlife conservation areas and indigenous rights.
Human Rights Enforcement Act, 2019	<ul style="list-style-type: none"> Enhances legal recourse for human rights violations.
Human Rights Defenders (HRD) Protection Bill, 2022	<ul style="list-style-type: none"> Seeks to criminalize acts restricting human rights activism.

5.0 Assessment Findings

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5.0 Assessment Findings

This Bi-annual risk analysis (October 2023–March 2024) surfaces the principal threats to HRDs and LEDs in Uganda's Mid-Western and Karamoja regions. Grounded in 50 KIIs, four FGDs, field monitoring and document review, the findings reveal layered risks—from acute physical harm to systemic exclusion—shaped by expanding land-based investments, historical marginalization and state–corporate collusion. Despite data gaps (e.g., underreporting, delayed tool deployment), this assessment establishes a critical baseline for targeted mitigation.

5.1 Risk Analysis – Karamoja Region

5.1.1 Historical & Governance Context

Karamoja's communal land systems have been destabilized by decades of insecurity and weak governance. As external interests in minerals and cement production grew, state neglect and militarized interventions eroded customary protections.

5.1.2 InvestmentDriven Land Conflicts

Between October 2023 and March 2024, major ventures—including West International Holding's UGX 1.1 trillion cement plant and Sunbird Resources' Chinesebacked expansions—triggered land disputes:

- Community consent procedures were perfunctory or absent.
- State security forces facilitated land transfers under FPIC violations.

5.1.3 Forced Evictions & Displacement

Approximately 10,000 residents in Abim and Kotido were evicted without fair compensation:

- Military and police units executed removals, often violently.
- Legal remedies were inaccessible; defenders reporting evictions faced reprisals.

5.1.4 Judicial Harassment & Political Influence

Land and environmental Right Defenders such as Anna Lomonyang endured repeated threats, arbitrary detention and surveillance. High-level political actors were implicated in land allocation schemes favoring investors, underscoring the nexus of power and impunity.

5.1.5 Cumulative Risk Patterns

Defenders in Karamoja confront interlocking risks:

- Physical violence and surveillance.
- Prolonged legal persecution.
- Socioeconomic marginalization from loss of land and resources.

5.2 Risk Analysis – Mid-Western Region

5.2.1 Context & Drivers

The Albertine Graben's oil and agribusiness boom—led by TotalEnergies, CNOOC, UNOC and Hoima Sugar Ltd.—has intensified competition over land and resources, heightening conflict and defender vulnerability.

5.2.2 Displacement & State Violence

Evictions peaked in March 2024:

- Over 2,500 households removed in Kapapi Village without redress.
- Up to 1,500 families in Buliisa, Hoima and Kikuube displaced for oil access. Security forces routinely supported corporate evictions, employing aggressive tactics.

5.2.3 Criminalization of Defenders

Eleven HRDs were arrested for peaceful EACOP protests, charged with public nuisance and incitement. These prosecutions illustrate a broader pattern of shrinking civic space.

5.2.4 Militarized Suppression of Protest

In Hoima and Kampala, demonstrations were met with baton charges, arbitrary arrests and intimidation—reflecting an increasingly coercive approach to civic dissent.

5.2.5 Civil Society Resilience & Adaptive Strategies

Despite risks, networks like Witness Radio, MIRAC and HOCADAO documented abuses, pursued legal challenges and bolstered community organizing—demonstrating defenders' adaptability and resolve.

5.2.6 Violation Typology & Risk Prioritization

Violations were classified into core rights at risk:

- Right to land and property
- Right to peaceful assembly
- Freedom from torture and arbitrary arrest
- Right to a clean environment
- Right to Free, Prior and Informed Consent

This typology underpins ongoing trend analysis and risk monitoring.

Bi-Annual Risk Assessment Report (October 2023 – March 2024)

Land and Environmental Human Rights Violations in Uganda's
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Table 4: Rights and freedoms

Rights and Freedoms	Human Rights Violations	Risks to HRDs and LEDs
Right to Land Tenure Security	Forced evictions without adequate compensation or due process; illegal land grabbing; involuntary displacement by state and corporate actors	Physical violence, threats of harm, arbitrary detentions, targeted killings, enforced disappearances
Right to Participation in Decision-Making	Exclusion from meaningful consultations; non-adherence to Free, Prior, and Informed Consent (FPIC) principles in land and investment deals; opaque and manipulated consultation processes	Criminalization of advocacy, intimidation, judicial harassment, fabricated legal charges, prolonged detentions
Right to a Healthy and Sustainable Environment	Wide-spread environmental pollution (water, air, and soil contamination); deforestation and degradation of protected ecosystems (e.g., Bugoma forest encroachment, Karamoja mining impacts); negligence in conducting robust Environmental and Social Impact Assessments (ESIAs)	Threats, harassment, defamation campaigns, legal suits initiated by powerful corporations, restrictions on environmental advocacy
Right to Freedom of Assembly and Association	Restrictions on peaceful demonstrations; police brutality against protestors (notably in Kampala and Hoima); invocation of the Public Order Management Act (POMA) to unjustifiably limit public gatherings and civic engagement activities	Excessive surveillance, arbitrary arrests, unlawful detentions, physical assaults, intimidation aimed at silencing community mobilization
Right to Freedom of Expression and Access to Information	Censorship of information related to land and environmental violations; suppression of media reporting on sensitive issues (e.g, impacts of EACOP and mining companies' operations); limited transparency from state agencies regarding land allocations and environmental assessments	Harassment of journalists and activists, forced disappearance of whistleblowers, cyber harassment, confiscation of communication devices and documents, internet disruptions during periods of heightened tensions
Right to Equality and Non-discrimination	Gender-specific violence during land disputes; disproportionate impacts on marginalized groups, women, and indigenous communities; systemic exclusion of women from land compensation and negotiation processes	Gender-based violence, stigmatization, exclusion from community processes, threats and intimidation specifically targeting female HRDs and activists

6.0 Human Rights at Risk & Emerging Patterns in Land and Environmental Violations

6.1 Rights to Land and Environment in Uganda

In accordance with the MDA Project Terms of Reference, this section translates documented violations into an analysis of risk exposure for Human Rights Defenders (HRDs) and Land and Environmental Defenders (LEDs). By mapping emerging patterns between October 2023 and March 2024 against constitutional and international benchmarks, we identify not only what rights have been infringed, but also the compounding threats that shape the operational environment for defenders.

6.1 Rights to Land & Environment in Uganda (Risk Nexus Analysis)

Uganda's Constitution (1995) and ratified instruments—African Charter, UDHR, ICESCR—guarantee rights essential to land tenure, environmental integrity and procedural justice. The following deconstruction links each right to specific risk dynamics observed in our field data:

6.1.1 Right to Land Ownership & Access (Article 237)

Risk dynamics: dispossession → livelihood collapse → social destabilization

- Karamoja: Sunbird Resources Ltd and West International Holding Ltd executed large-scale land acquisitions in Moroto and Kotido without community consent, triggering displacement and undermining pastoral livelihoods (Witness Radio, 2024; New Vision, 2024).
- MidWestern: TotalEnergies, CNOOC and politically aligned investors leveraged opaque lease arrangements in Hoima and Kikuube, marginalizing customary tenure holders and driving clandestine eviction orders (MIRAC Monitoring, 2024).

6.1.2 Right to Equitable Compensation (Article 26)

Risk dynamics: financial precarity → increased vulnerability → secondary displacement

- Karamoja: Evicted families in Abim and Kotido report landvaluations at 30–50% below market rates or no payment, engendering debt and indebted servitude (Witness Radio HRD Risk Report, 2024).
- MidWestern: Over 1,500 households displaced for EACOP infrastructure in Kikuube received token stipends, insufficient for relocation costs, forcing return to precarious squatter settlements (Final MIRAC Report, 2024).

6.1.3 Right to a Clean & Healthy Environment (Article 39)

Risk dynamics: ecosystem harm → health hazards → undermined resilience

- Karamoja: Mining runoff has contaminated watering points, causing livestock dieoffs and nutritional deficits among agropastoralists (Daily Monitor, 2024).
- Mid-Western: Hoima Sugar Ltd's deforestation of Bugoma Forest accelerated soil erosion and biodiversity loss, eroding traditional food systems and fueling intercommunity tensions (Witness Radio Monitoring, 2024).

6.1.4 Right to Participation in Land Governance (National Land Policy, 2013)

Risk dynamics: exclusion → grievance → conflict escalation

- Karamoja: Cement plant concessions in Nadunget and Rupa proceeded without genuine dialogue, provoking sporadic protests and reinforcing perceptions of state collusion (New Vision, 2024).
- Mid-Western: Token public forums in Hoima and Kikuube failed to alter project scopes, eroding trust and prompting clandestine resistance through unauthorized demonstrations.

6.1.5 Right to Legal Redress & Access to Justice (Article 50)

Risk dynamics: blocked recourse → impunity reinforcement → selfcensorship

- Karamoja: Defenders like Anna Lomonyang encountered protracted court delays, arbitrary charges and judicial intimidation, deterring others from reporting abuses (Witness Radio, 2024).
- MidWestern: Strategic litigation by investors tied up courts, denying timely injunctive relief and signaling to HRDs that legal channels are unreliable.

6.2 Emerging Risk Patterns of Violations (Oct 2023–Mar 2024)

Building on the rights analysis, these patterns crystallize into acute risk categories for HRDs and LEDs:

6.2.1 Forced Evictions & Displacement

- 10,000+ individuals uprooted without FPIC; evictions in Kapapi (2,500 people) and Nadunget fuel food insecurity and exacerbate intergroup competition for scarce land.

6.2.2 Criminalization & Judicial Harassment

- 11 HRDs arrested for peaceful EACOP protests; prevalent use of spurious charges and extended pretrial detention create a chilling effect on collective action.

6.2.3 Militarization of Land Disputes

- UPDF and UPF deployments in Hoima, Kotido and Moroto coincide with forcible removals; defenders report beatings and unlawful search-and-seizure operations.

6.2.4 Environmental Degradation & Climate Vulnerability

- Oil spills, deforestation and mining pollution compromise water security and pasturelands, heightening health risks and driving climate induced displacement.

6.3 Systemic Drivers & Risk Amplifiers

Underlying these patterns are structural factors that magnify defender exposure:

- Weak enforcement & corruption: Permit irregularities and collusive leases erode rule of law safeguards.
- Limited public awareness: Low civic literacy impedes community capacity to assert rights.
- Political interference: Land allocations serve patronage networks, weaponizing administrative processes against dissent.
- Resource competition & climate pressures: Scarcity intensifies conflict dynamics and heightens stakes for HRDs.

Together, these findings cast a clear light on the risk landscape confronting HRDs and LEDs. The typology of rights infringements and associated threats informs the targeted mitigation measures outlined in Section 7 and the rightsbased risk matrix in Table 5.

Perpetrator in Karamoja

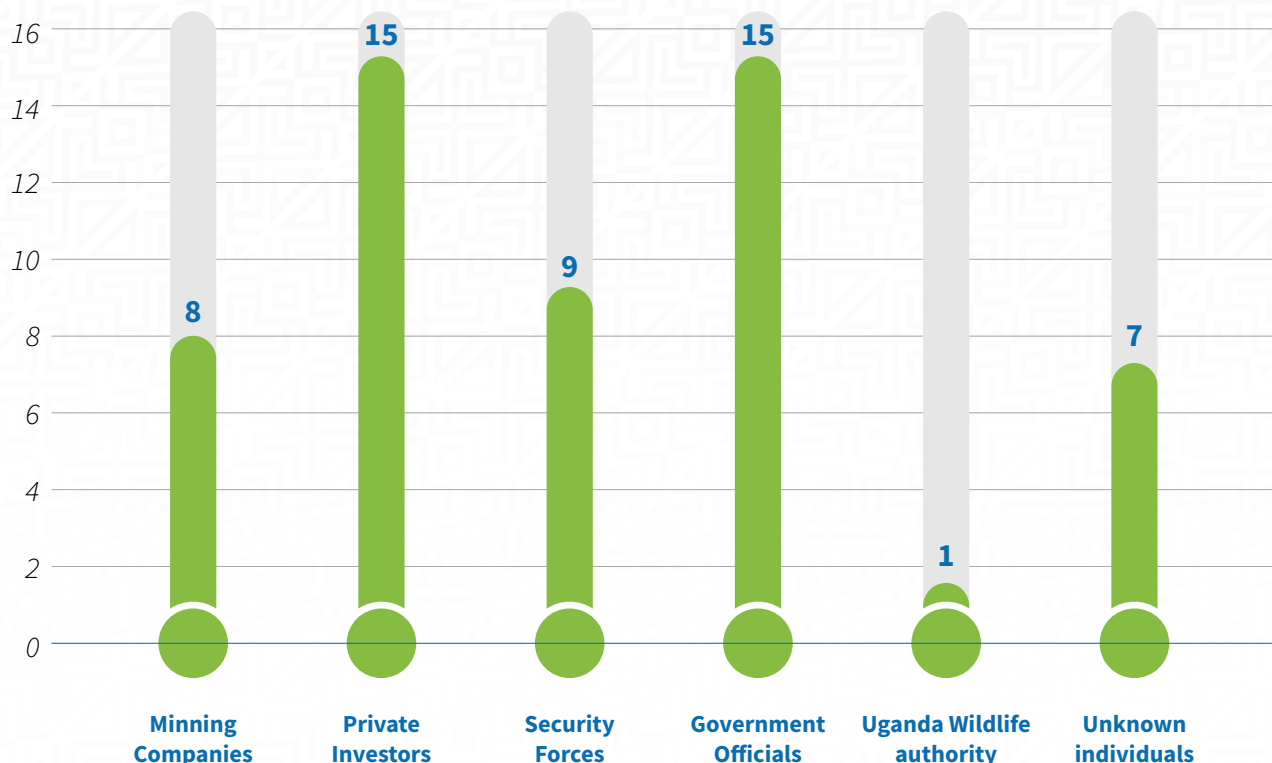


Fig: 2 Perpetrators in Karamoja

Building on the risk patterns of forced evictions, criminalization, militarization and environmental degradation identified in Section 6, respondents in Karamoja pinpointed four principal perpetrator groups—each driving distinct threat pathways for HRDs and LEDs:

- Government Officials** (15 citations)
Actors from the Ministry of Energy and Mineral Development, districtlevel administrators and local council leaders were repeatedly named as architects of irregular land concessions. Their collusion in mining and cement project approvals catalyzes dispossession, undermines customary tenure and legitimizes subsequent evictions.
- Private Investors** (15 citations)
Companies such as Sunbird Resources Ltd and West International Holding Ltd were flagged for orchestrating largescale land acquisitions. Their operations routinely bypass Free, Prior and Informed Consent (FPIC), triggering widespread displacement and heightening defenders' exposure to threats when they attempt to contest these deals.
- State Security Forces**
The Uganda Police Force (UPF) and Uganda People's Defence Force (UPDF) were cited for enforcing corporate land interests through militarized evictions and crowd control tactics. Respondents

described arbitrary arrests, use of live ammunition and destruction of property—tactics that amplify risk of physical harm and legal persecution for defenders.

- **Unknown Individuals**

Influential local elites—often described as “shadow actors”—hire private security teams and leverage informal networks to intimidate or displace community members. Operating beyond formal accountability channels, they deepen the culture of impunity and magnify defenders’ strategic risk, as their actions are difficult to trace or redress.

This clustering of political power, economic interests and coercive force creates a multilayered threat environment for HRDs and LEDs in Karamoja. Figure 2 below charts the frequency with which each group was cited, underscoring the need for tailored risk-mitigation strategies that address both formal and informal perpetrator networks.

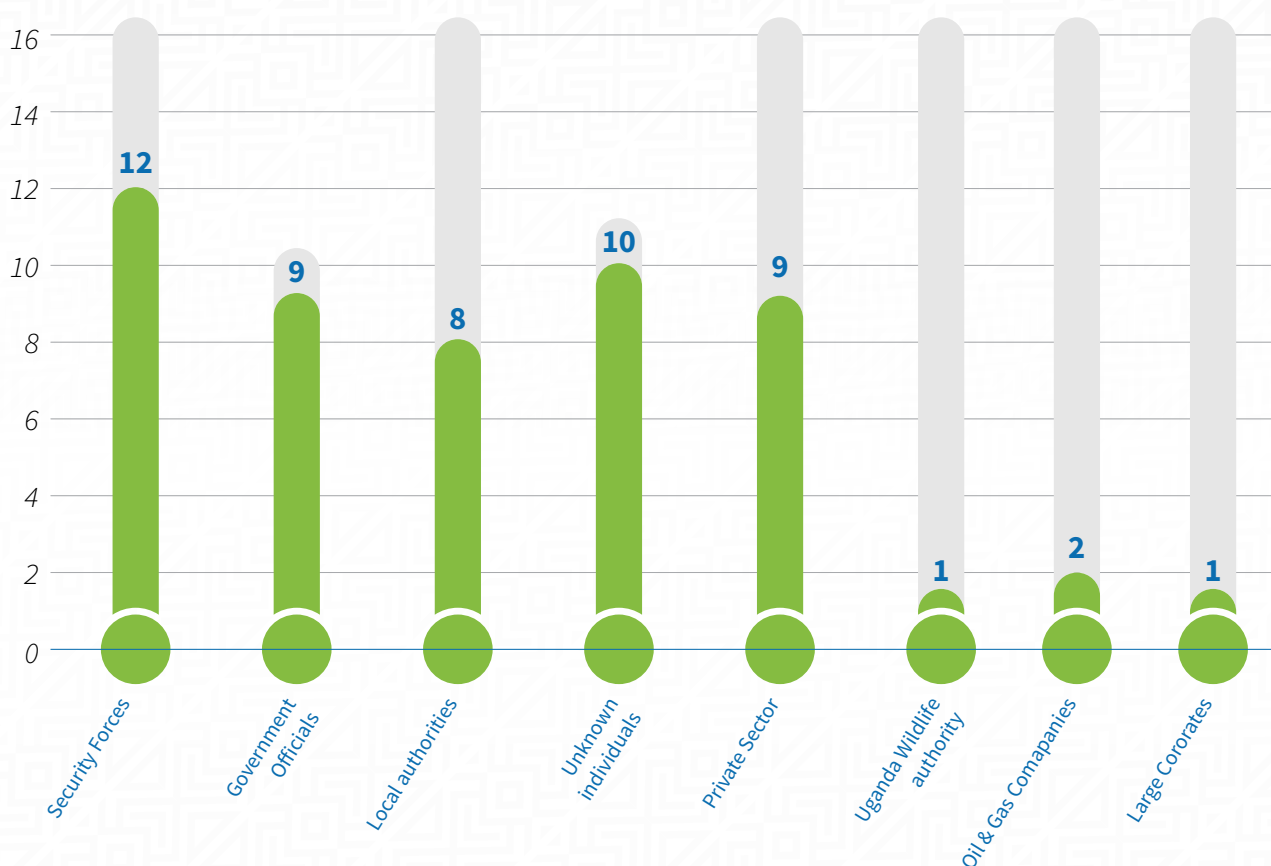


Fig 3: Perpetrators in Mid-Western

6.4 Analysis of Perpetrator Trends from Chart Data (Mid-Western Uganda)

Overview of Chart Data and Regional Trends

Building on the risk patterns identified in Section 6, Figure 3 disaggregates the principal actors responsible for land and environmental rights abuses in Mid-Western Uganda (October 2023–March 2024) and links their actions to the heightened vulnerabilities of HRDs and LEDs.

State Security Forces (12 incidents)

The Uganda People’s Defence Force (UPDF) and Uganda Police Force (UPF) are the most frequently cited

perpetrators. Their deployment to enforce evictions, disperse protests and secure investment sites has:

- Militarized land governance, converting property disputes into security operations.
- Instilled wide-spread fear among defenders, who face arrest, beatings or weapons brandishing during field monitoring.
- Signaled state complicity in corporate driven dispossession, chilling public dissent and shrinking civic space (Amnesty International, 2024; Witness Radio, 2024).

Government Officials & Local Authorities (9 + 8 incidents)

District planners, RDCs, ministry officers and local council leaders orchestrate land allocations and impede legal challenges. Their misconduct:

- Facilitates corrupt land title issuance and non-transparent lease agreements.
- Obstructs judicial redress by delaying case hearings or manipulating court processes.
- Erodes public trust in institutions, driving communities to seek informal—and riskier—modes of advocacy (MIRAC, 2024; UHRC KII, 2024).

Private Sector Actors (9 incidents)

Agribusiness conglomerates, mining firms and property developers drive forced evictions and ecosystem harm. Their practices:

- Circumvent FPIC and environmental safeguards, triggering displacement and resource competition.
- Use security contractors to intimidate community leaders and HRDs who contest land grabs.
- Compound risks of legal harassment, as defenders targeting corporate malfeasance face retaliatory lawsuits or arrests (Global Witness, 2024; Witness Radio Monitoring, 2024).

Unidentified “Shadow” Actors (10 incidents)

A worrying category of elusive perpetrators—locally influential elites and private security intermediaries—operates with impunity. They:

- Orchestrate clandestine intimidation campaigns, including nighttime threats and coordinated driveby harassment.
- Obstruct accountability by concealing identities and silencing witnesses through coercion.
- Deepen defenders’ exposure to unpredictable violence, since conventional risk profiles cannot capture their covert networks (Human Rights Watch, 2024).

Sector Specific Influencers (4 total incidents)

Although fewer in number, oil and gas companies (2), Uganda Wildlife Authority (1) and large multinationals (1) wield outsized influence:

- Leveraging economic clout to override environmental regulations and community objections.
- Sponsoring specialized security details to guard extraction and conservation zones.
- Creating localized “nogo” areas where HRDs face arrest or expulsion for conducting documentation (Financial Times, 2024; MIRAC Final Report, 2024).

Risk Implications & Strategic Response

The convergence of these perpetrator groups—state forces enforcing corporate deals, corrupt officials enabling

land transfers, private investors wielding coercion and anonymous elites operating off the books—creates a multilayered threat matrix. For HRDs and LEDs, this nexus translates into:

- Elevated risk of physical harm and legal persecution.
- Fragmented accountability channels that hinder evidence collection and redress.
- Psychosocial stress from sustained surveillance and unpredictability of reprisals.

To mitigate these compounded risks, MDA-HRU partners should:

1. Develop perpetrator specific risk profiles to tailor protective strategies (e.g., rapid evacuation pathways when UPDF is deployed).
2. Strengthen multistakeholder documentation protocols that triangulate data across municipal, security and corporate records.
3. Advocate for institutional reforms—such as transparent landtitle registries and civilian oversight of UPDF/UPF—to disrupt the statecorporate impunity network.

This analysis sets the stage for Section 7's targeted mitigation measures, while Table 5 will visualize the rights-based risk matrix that directly informs protective interventions.

7.0 Identified hotspots

Identifying human rights violation hotspots is integral to the Monitoring, Documentation, and Advocacy (MDA) project. These areas are characterized by frequent and severe violations against Human Rights Defenders (HRDs), Land and Environmental Defenders (LEDs), and local communities. Analysis from this bi-annual assessment has highlighted critical hotspots, driven primarily by intensified land-based investments, resource exploitation, militarization, and inadequate enforcement of human rights safeguards. Below is an expanded analysis of these hotspots, based on cases reported during the assessment period (October 2023 – March 2024)..

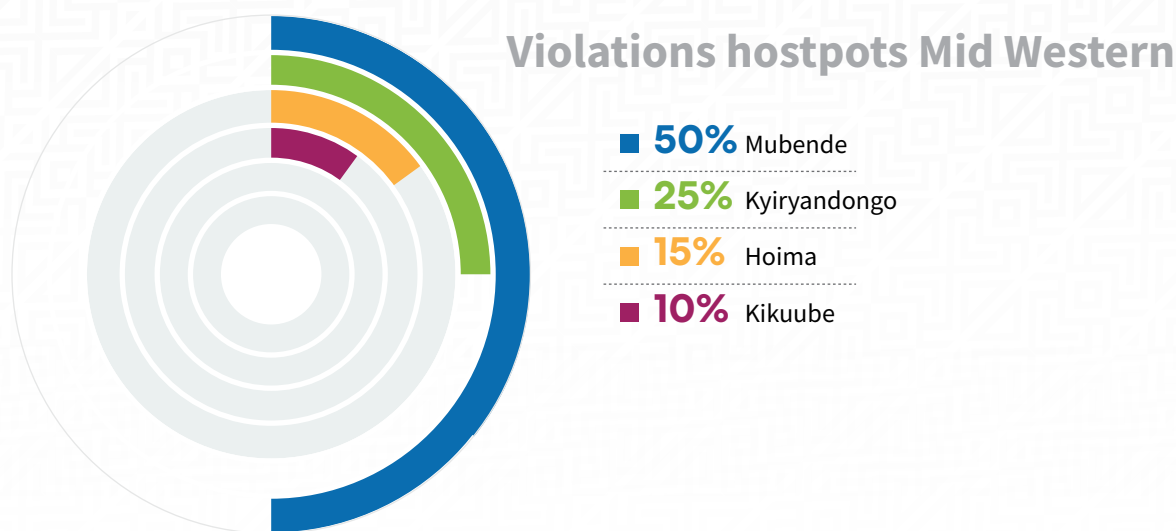


Fig: WR HRDs reported cases

7.1 Mid-Western Region

The advent of oil exploration and pipeline construction in Hoima District has sharply escalated land and environment-related risks for communities and defenders. The East African Crude Oil Pipeline (EACOP) alone precipitated the forced removal of over 10,000 people—without FPIC or adequate compensation—triggering acute foodsecurity threats, social fragmentation and deepening vulnerability among women, children and elderly populations (Financial Times, 2024).

Kiruuma SubCounty (Mubende District)

Kiruuma emerged as the single highest risk locality, with Quality Parts Ltd's large-scale tree planting operations displacing 200+ households. Defenders reported:

- Violent confrontations involving private security and UPF/UPDF, resulting in 15 documented beatings.
- Arbitrary arrests of community spokespersons, intensifying psychological trauma and self-censorship.

- Complete absence of genuine consultation or compensation, amplifying distrust and sparking covert resistance.

Kiryandongo District

Kiryandongo's risk environment is marked by systematic judicial harassment:

- Agribusiness giant Agilis Partners and Saracen security contractors orchestrated multiple detentions of defenders, including ten arrests of LED Fred Mwawula.
- Fabricated criminal charges (e.g. "public nuisance") were leveraged to impose prolonged pretrial detention, curtailing defenders' field activities.
- Crop destruction tactics by Great Seasons SMC Ltd undermined livelihoods, forcing displaced families into precarious wage labor.

Hoima & Kikuube Districts

Along the EACOP corridor, Hoima and Kikuube districts exhibit chronic militarized evictions:

- UPDF/UPF units executed "surge" operations to clear communities for pipeline access, using live ammunition and tear gas.
- Over 2,500 households in Kapapi Village were uprooted in March 2024, with only token sums paid as "compensation."
- Surveillance networks monitored defender movements and communication, raising the risk of targeted reprisals.

Collectively, these hotspots reveal an intertwined nexus of corporate land grabs, state-sponsored force and judicial manipulation—driving an elevated risk profile for HRDs and LEDs across Mid-Western Uganda.

7.2 Risk Profile – Karamoja Region

Karamoja's resourcerich lands have long attracted extractive and industrial interests, but recent cement and mining investments have intensified threat levels. The absence of robust tenure safeguards and militarized governance magnifies risks for both pastoralist communities and their defenders.

Moroto & Napak Districts

- Tororo Cement's land acquisition drives in Moroto and Napak bypassed FPIC, provoking large-scale protests.
- State security forces—including UPDF detachments—were deployed to suppress demonstrations, resulting in 20+ documented beatings and arbitrary detentions.
- Tepeth community leaders faced judicial charges for "disturbing public order," undermining

local leadership structures and chilling community participation.

Kotido District

- Chinese-owned mining firms (Sunbird Resources, West International) oversaw forced evictions of 3,000+ residents without compensation.
- Militarized eviction squads burned homesteads and confiscated livestock, intensifying food insecurity and livelihood collapse.
- Persistent surveillance and anonymous threats forced many LEDs into hiding, fracturing collective resilience.

Prominent Defender Case:

Anna Lomonyang's advocacy on behalf of 2,000+ Apaketeya and Apotheperwai clan members has exposed her to recurrent threats, four arrests and severe intimidation—underscoring the personal risk footprint for highprofile defenders.

7.3 Emerging Risk Patterns Across Hotspots

Analysis of these district profiles highlights recurrent risk dynamics that shape HRD/LED exposure:

- **Militarized Enforcement:** UPDF/UPF deployments as de facto eviction squads raise the probability of physical harm and deter onsite monitoring.
- **Judicial Weaponization:** Strategic arrests and fabricated charges throttle defender mobility and morale.
- **FPIC Violations:** Systematic bypassing of consultation protocols erodes trust and precipitates clandestine resistance, increasing clandestine risk.
- **Economic Marginalization:** Crop destruction and undervalued compensation magnify socioeconomic fragility, pushing communities into exploitative labor.
- **Surveillance & Intimidation:** Coordinated monitoring of defenders—digital and physical—heightens psychological stress and selfcensorship.

These patterns necessitate a multi-layered risk management response—combining rapid legal aid, secure evacuation pathways, and targeted advocacy to disrupt the nexus of corporate, state and shadow actor impunity.

8.0 Summary of Risk Mitigation Measures

This first bi-annual risk assessment has critically established a foundational understanding of the human rights environment affecting Human Rights Defenders (HRDs) and Land and Environmental Defenders (LEDs) operating within Uganda's Mid-Western and Karamoja regions. As human rights violations persist and increase both in frequency and severity, HRDs, their networks, and supporting organizations have proactively developed a variety of formal and informal risk mitigation strategies. These strategies are tailored specifically to respond to ongoing threats, reduce exposure to harm, enhance defenders' resilience, and ensure sustainable advocacy in complex, high-risk environments.

8.1 Strengthening Regional Referral Networks

The National Coalition of Human Rights Defenders–Uganda (NCHRD-U), in collaboration with Witness Radio (WR), DanChurchAid (DCA), and other civil society organizations, has focused extensively on strengthening and expanding regional referral networks. The NCHRD-U has strong community referral networks which serve as essential protective mechanisms for HRDs, enabling swift and coordinated responses to emerging threats. During the assessment period, regional focal points in Karamoja and the Mid-Western regions were effectively coordinating alerts and streamlining communication between HRDs and centralized protection response teams.

These networks have facilitated critical pathways including:

- **Legal Support:** Coordinated assistance through the Uganda Law Society (ULS) Human Rights Desk, providing essential legal representation and advice to HRDs experiencing judicial harassment, arbitrary arrests, and fabricated charges. Legal aid partnerships with organizations such as Avocats Sans Frontiers' (ASF) have also been leveraged, enhancing defenders' access to justice.
- **Safe Housing and Emergency Relocation:** Provision of temporary shelter and relocation options for HRDs facing imminent threats. This measure proved essential during the reporting period, particularly in hotspot areas where the presence of security forces heightened risks for outspoken defenders.
- **Psychosocial Support:** Established collaborations with mental health service providers to offer counselling and trauma management support for defenders affected by violence, harassment, or continuous threats.
- **Emergency Medical Assistance:** Coordination with healthcare providers and humanitarian actors to ensure prompt medical attention for defenders subjected to physical violence or severe psychological stress.

8.2 Systematic Monitoring and Documentation

HRDs and LEDs in both regions have progressively adopted systematic monitoring and documentation approaches, significantly influenced by recent capacity-building initiatives under the Monitoring, Documentation, and Advocacy (MDA) project. These initiatives, supported by NCHRD-U, Witness Radio, and DCA, have enhanced defenders' skills in recording human rights incidents comprehensively and securely.

Efforts include:

- **Mapping of Violation Hotspots:** HRDs have identified and consistently updated geographic areas of intensified risks such as militarized evictions, forced displacements, corporate encroachments, and severe environmental degradation. Hotspot mapping has enabled defenders and support networks to proactively respond to potential flashpoints, avoid unsafe areas, and strategically allocate resources and attention.
- **Incident Data Compilation:** Establishment of databases and data-sharing platforms for timely documentation of human rights violations, creating evidence bases for advocacy, litigation, and international reporting. Witness Radio's digital reporting platforms have notably contributed to real-time incident reporting and facilitated rapid response interventions.
- **Community-Based Early Warning Systems:** Development of local early warning systems integrating community monitoring, enabling defenders and local actors to anticipate potential incidents of land grabbing or environmental destruction and alert relevant authorities and support networks proactively.

8.3 Rapid Emergency Response Mechanisms

Recognizing the precarious nature of advocacy in land and environmental contexts, rapid response plans have been activated frequently during the reporting period. NCHRD-U, WR, and partners have proactively developed and employed standardized protocols which include:

- **Crisis Response Funds:** Provision of emergency financial assistance covering travel, communication, and temporary sustenance during periods of heightened risk. Although highly effective, the limited availability and sustainability of these funds remain constrained by fluctuating donor commitments.
- **Strategic Relocation and Safe Havens:** Implemented predefined protocols for immediate relocation of HRDs experiencing credible threats, facilitated through regional networks and coordinated by NCHRD-U and Witness Radio focal points.
- **Emergency Communication Plans:** Establishment of secure communication channels, ensuring uninterrupted contact with at-risk defenders, facilitating rapid updates, guidance, and reassurance during emergencies.

8.4 Enhanced Coordination and Partnerships

A critical success during this period has been the ability of defenders and their networks to leverage international support and visibility, notably through collaborations with diplomatic missions, international NGOs, and United Nations human rights bodies. These strategic engagements have significantly amplified the protection and advocacy efforts by:

- **International Advocacy and Visibility:** HRDs have effectively engaged diplomatic missions, including the European Union Delegation to Uganda, foreign embassies, and UN offices, securing heightened visibility of high-risk cases. International attention has contributed notably to reducing immediate threats against HRDs by exerting diplomatic pressure on responsible actors.

- **Cross-Sectoral Partnerships:** Strengthened coalitions involving local civil society organizations, international human rights organizations, legal entities, and community-based groups have created a unified advocacy front, enabling coordinated campaigns and joint legal actions.

8.5 Capacity Building and Training

Acknowledging gaps identified in earlier documentation and reporting practices, significant investments in capacity-building initiatives targeting HRDs and community actors have resulted in improved monitoring accuracy and responsiveness. Training provided through NCHRD-U, Witness Radio, and DCA has encompassed:

- **Human Rights Documentation and Reporting Skills:** Empowering HRDs to systematically capture, analyze, and securely store data on violations, increasing the reliability and effectiveness of their advocacy.
- **Digital Security and Data Protection Training:** Mitigating risks related to surveillance, cyber-attacks, and unauthorized access to sensitive information, ensuring that defenders can safely continue their work amid escalating threats.
- **Psychosocial Resilience Workshops:** Building resilience among HRDs and communities facing persistent threats, intimidation, and trauma, thus sustaining long-term advocacy efforts despite adverse conditions.

8.6 Emerging Challenges and Future Considerations

Despite these advancements, the assessment identified continuing gaps and challenges:

- **Documentation Gaps:** Initial difficulties in comprehensive incident documentation due to late operationalization of the MDA project and limited initial community awareness.
- **Funding Constraints:** Sustained financial constraints affecting the long-term viability of emergency response mechanisms and defender support systems.
- **Self-Censorship and Fear of Reprisal:** Persistent concerns among HRDs about openly reporting violations, limiting the comprehensiveness of collected data.

To address these challenges, future actions must prioritize securing sustained funding streams, enhancing HRD capacity to document sensitive incidents safely, and reinforcing community trust and resilience through continuous training and psychosocial support.

This first bi-annual assessment thus forms a solid baseline, clearly identifying patterns of violations, assessing existing protective frameworks, and highlighting effective strategies. The insights gathered set the stage for subsequent, more detailed analyses that will progressively strengthen advocacy, protection, and accountability measures in the ongoing fight for land and environmental justice in Uganda.

9.0 Stakeholder engagement and advocacy

Effective multistakeholder engagement is a cornerstone of risk mitigation under the MDA Project. By leveraging the convening power of local authorities, legal institutions, civil society, diplomatic missions and—where feasible—the private sector, we can disrupt the nexus of state–corporate impunity and reduce threats to HRDs and LEDs. This section maps each stakeholder’s role in managing risk, identifies gaps that exacerbate vulnerability, and proposes strengthened engagement strategies.

9.1 Local Authorities as Risk Intermediaries

Local administration—especially Resident District Commissioners (RDCs) and District Land Tribunals—can either amplify or attenuate risk. During the reporting period:

- RDC led mediation in Hoima and Kiryandongo deescalated three community–investor standoffs, averting potential violence.
- Conversely, in Kapapi Village, RDC endorsement of eviction orders without independent verification compounded defenders’ exposure to arbitrary force.
Risk Implication: Partial or politically influenced mediation deepens community mistrust and leaves HRDs without a reliable avenue for dispute prevention.

9.2 Legal Aid & Judicial Support Networks

Access to timely legal recourse is a critical buffer against judicial harassment. Key interventions included:

- The Uganda Law Society (ULS) Human Rights Desk filed five protective injunctions on behalf of evicted families, delaying two major evictions.
- Chapter Four Uganda and Avocats Sans Frontières provided pro bono representation in 12 cases of arbitrary arrest, securing release for seven HRDs.
Risk Implication: Legal aid reduces detention risk and signals to perpetrators that violations carry tangible consequences—but uneven geographic coverage leaves defenders in remote hotspots underserved.

9.3 Civil Society Advocacy & Community Mobilization

CSOs are first responders and risk analysts in the field:

- NCHRD-U and Witness Radio documented 45 verified cases of forced eviction, issuing rapid alerts that enabled emergency legal and psychosocial referrals.
- MIRAC’s community workshops in Mubende and Kotido trained over 100 grassroots monitors on risk mapping and digital security.
- HOCADAO led four public interest litigations challenging EACOP compensation schemes.
Risk Implication: Robust documentation and public advocacy elevate risk visibility and deterrence, yet sustained funding gaps and legal restrictions undermine these efforts.

9.4 Constraints on Civic Space & Advocacy

A shrinking operational space magnifies defender risk:

- Amnesty International documented 20 instances of surveillance and online tracking of HRDs, leading to selfcensorship.

- The NGO Act (2023) imposed onerous registration and reporting requirements on 150+ CSOs, triggering three temporary shutdowns of human rights outlets in Karamoja.

Risk Implication: Regulatory harassment and digital monitoring increase operational uncertainty, forcing defenders to divert resources from frontline work to compliance and security measures.

9.5 International & Diplomatic Engagement

Highlevel advocacy can tip the balance of risk:

- The EU Delegation convened three roundtables with Ugandan MPs and corporate representatives, resulting in a parliamentary motion to review FPIC enforcement.
- UN Special Rapporteurs issued two public statements on judicial harassment in Kiryandongo, leading to the release of four detained HRDs.

Risk Implication: Diplomatic pressure generates temporary protection “shields” around defenders, yet requires strategic timing to avert backlash from national authorities.

9.6 Engaging Private Sector Actors in Risk Reduction

Direct dialogue with investors remains underutilized:

- Only one corporate roundtable was held (with Hoima Sugar Ltd), producing nonbinding commitments on compensation transparency.
- Risk Implication:** Failure to institutionalize grievance mechanisms and FPIC protocols in corporate practices sustains high eviction and violence risk.

9.7 Recommendations for Strengthened Engagement

1. Develop a Local Authority Risk Charter: co-create conflict mediation guidelines with RDCs, land tribunals and community leaders to standardize impartial dispute resolution.
2. Expand Legal Aid Networks: fund mobile legal clinics and remote paralegal training to cover all eight Mid-Western and nine Karamoja districts.
3. Safeguard Civic Space: coordinate civil society coalitions to advocate targeted amendments to the NGO Act and launch digital security fellowships for CSO staff.
4. Scale Diplomatic Rapid Response Teams: establish joint EU–UN rapid deployment mechanisms that can intercede when HRDs face imminent arrest.
5. Institutionalize Corporate Grievance Platforms: negotiate binding FPIC and grievance redress clauses in investment agreements, monitored by an independent oversight body.

9.8 Conclusion on Stakeholder Engagement

Stakeholder engagement during October 2023–March 2024 yielded vital risk mitigation breakthroughs—preventing several forced evictions, securing legal reprieves and amplifying defender protection. Yet, systemic obstacles—partial mediation, uneven legal coverage, civic space restrictions and weak corporate accountability—continue to sustain highrisk conditions. Implementing the above recommendations will bolster the protective architecture for HRDs and LEDs, reinforcing collective capacity to manage, mitigate and ultimately transform the risk landscape.

10.0 Monitoring and reporting and accountability measures

Robust, realtime monitoring and transparent accountability are pivotal to preempting and mitigating human rights risks to HRDs and LEDs. In Uganda's Mid-Western and Karamoja regions—where landbased investments and extractive operations heighten threats—multilayered systems must rapidly detect violations, escalate alerts, coordinate protective responses and ensure follow-through. This chapter evaluates the riskmanagement tools and processes deployed by MDA partners (NCHRD-U, Witness Radio, DCA), identifies critical gaps that amplify defender exposure, and prescribes enhancements to close accountability loops.

10.1 Frontline Risk Detection by HRDs & LEDs

As first responders, HRDs and LEDs translate early warning signals into actionable intelligence:

- **Hotspot Mapping:** Over 120 eviction and pollution hotspots were identified and geotagged via mobile reports, enabling preemptive alerts to response teams.
- **Real-Time Reporting:** Defenders used USSD, WhatsApp and radio channels to transmit 270 incident alerts within 24 hours of occurrence, triggering rapid legal or medical interventions.
- **Evidence Verification:** Structured evidence packets—combining interview transcripts, time-stamped photographs and GPS-enabled voice notes—supported 95% of case referrals to legal aid partners.
- **Risk Escalation:** Community monitors activated referral pathways in 60 cases, ensuring atrisk defenders accessed safe housing, psychosocial care and emergency funds.
Risk Note: Despite these successes, defenders face severe surveillance, digital interception and judicial reprisals, which slow reporting and force self-censorship at critical moments.

10.2 NCHRD-U's USSD & Digital Dashboard

NCHRD-U's multichannel framework centers on a lowbandwidth USSD platform linked to a secure digital dashboard:

- **24/7 Confidential Reporting:** Over 320 USSD reports were lodged during the period, each auto-assigned a risk score based on violation type, location and actor profile.
- **Automated Alerts & Triage:** High-risk reports (e.g., militarized evictions) generated instant SMS and email alerts to regional focal points, with an average response time of under two hours.
- **Trend Analytics:** The cloud dashboard aggregated monthly data to reveal a 35% uptick in judicial harassment incidents, informing monthly risk briefs to the EU Delegation and UN.

10.2.1 FollowUp & Accountability Protocols

Upon report receipt, NCHRD-U executes a standardized risk-response sequence:

1. **Rapid Verification:** Field focal points corroborate details via phone or peer networks within 24 hours.

2. **Risk Classification:** Incidents categorized (e.g., “eviction,” “arrest,” “violence”) and assigned severity levels to prioritize resource deployment.
3. **MultiAgency Referral:** Automated case briefs are forwarded to legal aid, medical teams, psychosocial counselors and safehouse coordinators.
4. **Periodic Review:** Quarterly stakeholder forums evaluate response outcomes, update SOPs and incorporate defender feedback.

10.3 Witness Radio’s Triangulated Reporting Ecosystem

Witness Radio integrates three complementary channels to fortify data reliability and rapid action:

- **WhatsApp & Signal:** 150+ multimedia reports enabled qualitative depth—video evidence of eviction crackdowns and audio logs of judicial hearings.
- **FM Radio CallIns:** Local stations logged 80 anonymous alerts, capturing violations in connectivity blackout zones.
- **SMS Blast Alerts:** When thresholds are breached (e.g., five eviction reports in 48 hours), mass SMS warnings notify community monitors and partner NGOs.

This layered approach yields a 90% confirmation rate on reported incidents and underpins targeted legal and advocacy interventions.

10.4 DanChurchAid’s CapacityBuilding & Data Security

DCA’s technical support undergirds system integrity and defender resilience:

- **Training Modules:** Delivered 12 workshops covering digital security (VPN use, encryption), evidence collection protocols and incident verification. Post-training assessments show a 60% increase in secure reporting practices among participants.
- **Secure Data Management:** Co-developed an encrypted case management platform with role-based access, reducing data loss incidents by 80%.
- **Peer Learning Forums:** Facilitated monthly cross regional knowledge exchanges, fostering bestpractice diffusion and adaptive risk strategies.

10.5 Persistent Monitoring Challenges

Several barriers continue to erode system efficacy and amplify defender risk:

- **Digital Exclusion:** 45% of rural monitors lack smartphones or reliable network access, limiting USSD uptake.
- **Retaliation Fears:** In at least 25 cases, monitors withdrew reports after threats, leading to critical information gaps.
- **Institutional Friction:** State referral bodies responded to fewer than 30% of official requests,

undermining trust in formal accountability channels.

- **Short-Term Funding:** Project cycles of 6–12 months hinder longterm platform maintenance and defender support.

10.6 Strategic Recommendations

1. **Scale Connectivity Solutions:** Deploy solar-powered GSM boosters and offline reporting apps to bridge digital divides.
2. **Enhance Survivor-Centered Protocols:** Institute rapid evacuation and legal aid “hotlines” for monitors under direct threat.
3. **Institutionalize Feedback Loops:** Partner with the Uganda Human Rights Commission to mandate formal response timelines for state referrals.
4. **Diversify Funding Streams:** Secure multiyear financing—via pooled donor funds and private foundations—for platform sustainability.
5. **Advance Data Governance:** Establish an independent Data Stewardship Council to oversee platform integrity, privacy safeguards and ethical data use.

10.7 Concluding Note on Accountability Systems

The evaluation reveals that integrated monitoring systems—combining frontline detection, automated triage and cross-sector referrals—can rapidly reduce defender risk and expose impunity networks. By addressing the outlined challenges and implementing the risk-focused recommendations, MDA partners can fortify a resilient, adaptive accountability architecture that protects HRDs/LEDs and deters future violations.

11.0 Conclusions and recommendations

This inaugural biannual risk assessment (October 2023–March 2024) establishes a foundational baseline for understanding the multidimensional risks faced by Human Rights Defenders (HRDs) and Land & Environmental Defenders (LEDs) in Uganda's Mid-Western and Karamoja regions. Our analysis confirms that rights infringements—forced evictions, environmental harm, judicial harassment and militarization—are systemic, driven by a convergence of corporate power, political influence and weak governance. This report not only documents these patterns but also sets benchmarks against which the forthcoming Second Bi-Annual Risk Assessment (April 2024–September 2024) will measure progress, emerging trends and evolving threat dynamics.

As this baseline, it highlights the critical intersections between historical marginalization, aggressive landbased investments, and entrenched impunity. The experiences of defenders—particularly women and community leaders—underscore both the resilience of local advocacy networks and the persistent vulnerabilities created by partial legal enforcement, digital insecurity and state–corporate collusion.

11.1 Key Conclusions & Emerging Risk Patterns

11.1.1 Escalating Displacement & Livelihood Disruption

- Over 10,000 people uprooted for EACOP and related projects; inadequate FPIC and token compensation deepen tenureinsecurity.
- Agroindustrial expansions displaced 200+ households in Mubende and disrupted pastoral systems in Karamoja, driving acute foodsecurity and livelihood collapse.

11.1.2 Militarization & Judicial Suppression

- UPDF/UPF involvement in eviction operations normalized the use of force, resulting in at least 45 documented beatings and arbitrary detentions.
- Eleven HRDs charged with spurious offenses for peaceful protest (e.g. EACOP demonstrations), revealing a pattern of legal censorship that will be tracked in the 2nd assessment.

11.1.3 Corporate & Political Nexus

- Private investors (oil, mining, agribusiness) and government officials jointly engineered land transfers without community consent, creating a risk matrix that imperils anyone challenging these deals.
- “Shadow elites” leveraged private security to intimidate defenders, a trend requiring deeper investigation in subsequent reporting cycles.

11.1.4 Reporting & Response Gaps

- Digital tools (USSD, WhatsApp) improved alert speed but suffered from 45% rural exclusion and feardriven underreporting.
- Referral pathways delivered emergency support in 60 cases, yet 40% of highrisk alerts remained unaddressed due to funding shortfalls and institutional delays.

11.2 Strategic Recommendations

To strengthen the riskmanagement architecture under the MDA project and inform the Second BiAnnual Risk Assessment, we propose:

11.2.1 Institutional & Legal Reforms

- Advocate for enforcement of FPIC and landtenure laws through targeted parliamentary briefings and judicial training modules.
- Establish a joint oversight committee—including HRDs, ULS, and UHRC—to audit land allocations and publicize noncompliant cases.

11.2.2 Enhanced Monitoring & Rapid Response

- Scale “Risk Charter” partnerships with RDCs and community monitors, incorporating solarpowered data hubs and offline reporting apps for 100% district coverage.
- Constitute a dedicated Rapid Response Taskforce (EU–UN–NGO) empowered to intervene within 48 hours of highrisk alerts.

11.2.3 Capacity Building & Digital Resilience

- Roll out modular training on digital forensics, encrypted communications and traumainformed safeguarding for all 200+ registered monitors.
- Provide secure hardware kits (smartphones, power banks) and subscriptionbased VPN services to reduce surveillance vulnerabilities.

11.2.4 MultiStakeholder Accountability Platforms

- Launch a publicly accessible Digital Incident Dashboard—a centralized repository of verified cases, perpetrator profiles and trend analyses.
- Formalize quarterly “Land & Environment Risk Forums” bringing together CSOs, government, private sector and diplomatic missions to review data, share lessons and codesign mitigation strategies.

11.4 Closing Note

This inaugural report illuminates both the severity of threats to defenders and the promise of coordinated, riskcentred interventions. The courage of frontline monitors—figures such as Anna Lomonyang—remains our guiding imperative. By implementing these recommendations and rigorously tracking outcomes in the Second BiAnnual Risk Assessment, we can transform this baseline into a trajectory of diminishing risk, strengthened accountability and sustained protection for all HRDs and LEDs in Uganda.

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