



Luxembourg, 15 December 2022

Environmental and Social Data Sheet

Overview

Project Name:	UGANDA TELECOM TOWER EXPANSION
Project Number:	2022-0268
Country:	UGANDA
Project Description:	The project relates to the construction of 659 new mobile sites in Uganda. At least 50% of the sites will be located in rural areas where there is no mobile service coverage currently, while the rest will provide additional capacity in areas where the current mobile networks are saturated.

EIA required: yes

Project included in Carbon Footprint Exercise¹: no

(details for projects included are provided in section: “EIB Carbon Footprint Exercise”)

Environmental and Social Assessment

Environmental Assessment

The project includes the construction of new mobile towers and rooftop structures, in rural and urban areas (around 50% of the total number of infrastructures each). Mobile tower sites have a relatively small footprint of between 200-400 m² typically and most towers are between 30 to 50 meters tall. Potential environmental impacts are expected to be non-significant and related mainly to noise, dust and waste disposal during construction, which will be mitigated by applying industry-standard practices.

The promoter is not planning to deploy sites in sensitive areas, such as national parks outside their already urbanised parts. The Ugandan National Environment Act from 2019 includes the construction of telecommunication towers in Schedule 5, which lists the projects for which ESIA's are mandatory. The Promoter will send the Bank, ahead of each disbursement request, a list providing an overview in table format of (1) the relevant sites related to that disbursement request, (2) the confirmation that each of those sites have been subject to an ESIA and have received the competent authority's approval and (3) any particular conditions of approval put by the competent authority for the listed sites. Then, and based on the information provided in that list, the Bank could reserve the right to request sample ESIA's, if and as relevant, before providing the non-objection on this condition for disbursement.

¹ Only projects that meet the scope of the Carbon Footprint Exercise, as defined in the EIB Carbon Footprint Methodologies, are included, provided estimated emissions exceed the methodology thresholds: 20 000 tonnes CO₂e/year absolute (gross) or 20 000 tonnes CO₂e/year relative (net) – both increases and savings.



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During the operations phase, the main potential environmental impact of a mobile network is related to the exposure to EMF (electromagnetic field) emissions by RAN (radio access network) equipment. Studies continue to be conducted to further assess the potential long-term effects of exposure to EMF emissions on human health. As a mitigation measure, Uganda has adopted exposure limits aligned with the ICNIRP (International Commission on Non-Ionizing Radiation Protection) guidelines. In accordance with its mandate, the Uganda Communications Commission (UCC) conducts national surveys and upon request investigations to evaluate compliance of the telecommunications installations in respect to human exposure to EMF. In the last national survey that was conducted between April 2021 and March 2022, countrywide, it was found that the exposure levels were significantly lower than the reference level of the ICNIRP guidelines in all cases. It shall be noted that the project does not include any radio equipment, so it does not generate EMF radiation directly. The compliance with the EMF exposure limits corresponds to the mobile network operator, which owns and operates the radio equipment that will be installed in the promoter's mobile sites.

The project is aligned with the Paris agreement as it relates to the deployment of passive infrastructures required to deploy mobile networks consistent with the Bank's definition (Annex 2 Table H of EIB's climate bank roadmap - CBR).

As a corporate, the counterpart is in scope but screened out of the PATH Framework because it is neither a high emitting nor a highly vulnerable entity.

Annual absolute GHG emissions during the operation phase of the project are estimated at 0.3 kTCO_{2eq}, which falls below the threshold defined for the Carbon Footprint Exercise. Relative emissions are lower than the threshold as well. The main power source for the project will be solar PV, so the project is eligible for Climate change mitigation – renewable energy for the percentage of project cost related to the solar power solution.

Social Assessment

The increased availability of mobile connectivity enabled by the project is expected to generate wide-ranging socio-economic benefits, notably for the populations currently living in unserved areas that will be covered by the project.

The promoter has undertaken to acquire the land necessary for the project sites through voluntary lease or purchase agreements. The sites have a relatively small physical footprint of between 200-400 m² typically. Once the land is secured, the site construction takes about 30 calendar days. The promoter outsources the land acquisition process, as well as the construction, operation and maintenance of the sites to specialised contractors. To ensure that the land is not contested, that the concessions are indeed voluntary and do not lead to involuntary resettlement, the project has a site identification and verification system in place.

Considering the locations of some of the foreseen sites, there is a likelihood that Indigenous Peoples (IPs) may be present in certain project areas. The promoter will develop an Indigenous Peoples Planning Framework, which will outline how the project will manage instances where potential impacts on IPs may be identified, including, as relevant, to ensure that IPs are adequately consulted leading to their free, prior and informed consent.



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Public Consultation and Stakeholder Engagement

Public consultations are organised as part of the ESIA processes for the sites. The promoter has further developed a Stakeholder Engagement Strategy and a Grievance and Redress Mechanism Plan, which define its ongoing engagement approach and the grievance management modalities applicable to the project.

Other Environmental and Social Aspects

The promoter's team have significant previous experience in the deployment of mobile access network sites for the mobile network operators in Uganda. The promoter operates with a lean organisational structure relying on contractors, which are adequately supervised by the promoter's staff, for labour intensive activities. Ubuntu has a set of adequate E&S policies, including related to labour and occupational and public health and safety aspects. E&S considerations and requirements are integrated in its operational processes, from site identification, acquisition, design and construction to operation and maintenance, and are included in contractor and supplier contracts.

Conclusions and Recommendations

The project is not expected to lead to significant adverse environmental or social impacts, considering its nature, the relatively small footprint of each site and the application of industry-standard E&S mitigation measures. The project will have significant positive social impacts, notably due to the wide-ranging socio-economic benefits that digital infrastructure deployment has been shown to generate for the local communities. As a condition for the first disbursement, the promoter will provide, to the Bank's satisfaction an Indigenous Peoples Planning Framework, and for all disbursements, a list of relevant ESIA approvals and the relevant ESIA samples to be approved by the Bank.

With the appropriate conditions in place, the project is acceptable for financing in environmental and social terms.