

**PARLIAMENT OF THE REPUBLIC OF UGANDA**

**REPORT OF THE COMMITTEE ON ENVIRONMENT AND NATURAL RESOURCES ON THE ENERGY EFFICIENCY AND CONSERVATION BILL, 2024**

Office of the Clerk to Parliament  
Parliamentary Building, Kampala

September 2025

## 1. INTRODUCTION

Rt. Hon. Speaker and Members,

The Energy Efficiency and Conservation Bill, 2024 was read for the first time on 04<sup>th</sup> February 2025 and referred to the Committee on Environment and Natural Resources for scrutiny and report back in accordance with Rule 135(1) of the Rules of Procedure of Parliament. The Committee has, in accordance with Rule 135(2), considered the Bill and hereby reports.

## 2. BACKGROUND

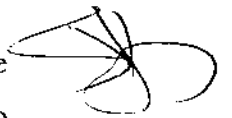
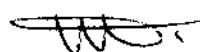
Energy efficiency involves using less energy to do the same job. Improving energy efficiency is one of the most cost-effective measures that Uganda can take to reduce Greenhouse Gas (GHG) Emissions. Energy conservation, on the other hand, involves using less energy by changing one's behaviour and habits to use less energy. It generally includes actions to reduce the amount of end-use energy consumption.

Energy is critical for the development of any country as it is a critical component of economic production. The trend for energy demand globally suggests that more and more energy will be required, and yet many of the sources of energy are finite, which makes it imperative to devise ways to efficiently use what is available. At the same time, the increase in energy demand is directly linked to global warming and climate change and, as the Conference of Parties (COP) of the United Nations Framework Convention for Climate Change noted at its 28th meeting in 2023, there is need to double the global average annual rate of energy efficiency from around 2% to over 4% until 2030.

In developing countries like Uganda, the demand for energy is even more pronounced because of the need to improve infrastructure and to industrialise. Moreover, for countries such as Uganda where over 85% of households rely on biomass for cooking, improved cookstoves and efficient technologies have the potential to cut fuel consumption by up to 25%, and in



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the process save 11 million tonnes of tree biomass annually thereby. This not only reduces deforestation but is also crucial for protecting biodiversity and curtailing global warming.

Energy efficiency and conservation are also key to attaining sustainable development and are equally critical if the world is to remain on course to attain the targets set out in the Paris Agreement of keeping the global increase in temperature to not more than 1.5%.

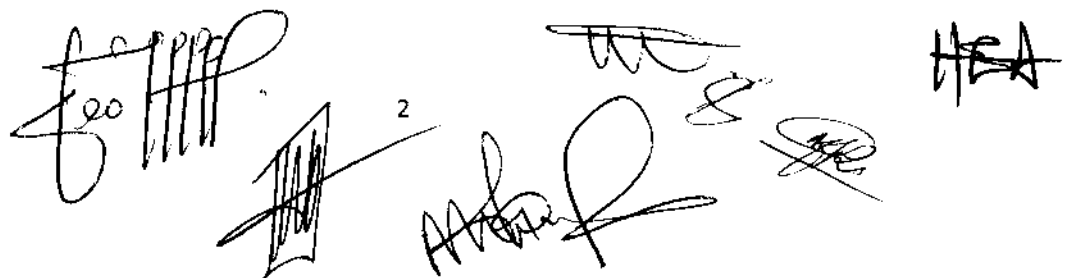
The advantages of energy efficiency and conservation are numerous advantages for Uganda. These include economic savings through the use of technologies that use less energy and therefore less cost; job creation through opportunities in innovation and the manufacture of energy efficient appliances; and energy security through electric mobility which has the potential to significantly reduce petroleum importation.

By using energy more efficiently, energy demand can be reduced, leading to lower energy bills for consumers, lower emissions of greenhouse gases (GHG) and other pollutants; reduced need for energy infrastructure, and increased energy security through a reduction of imports. Globally, energy efficiency has contributed to substantial savings in energy consumption.

### **3. POLICY AND PRINCIPLES OF THE BILL**

The main object of this Bill is to establish a legal, institutional, and regulatory framework to enhance energy efficiency and conservation in Uganda. Energy efficiency entails the use of technology that requires less energy to perform the same function. Currently, energy efficiency initiatives are voluntary and lack regulation, making Uganda susceptible to becoming a dumping ground for outdated technologies, resulting in significant energy waste.

The absence of a clear regulatory framework hampers the adoption of energy-efficient technologies and practices across various sectors. Widespread use of outdated and inefficient equipment coupled with inadequate financing



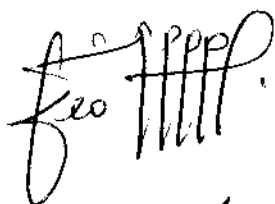
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mechanisms restrict access to necessary funds for upgrading equipment at industrial, commercial and household level.

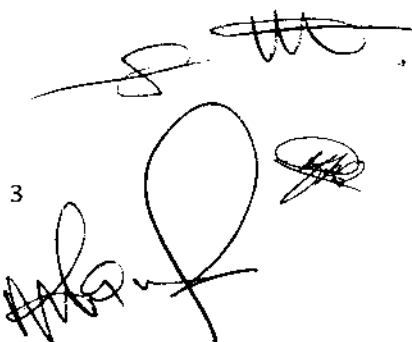
The unregulated use of energy-consuming technologies exacerbates the problem, driven by gaps in the existing legal frameworks that facilitate illegal energy usage. Poor operation and maintenance practices increase energy waste, while non-compliance with established procedures and guidelines perpetuates inefficiency. Weak enforcement mechanisms and inadequate standardisation also hinder progress, as does the lack of necessary testing equipment. The lack of integration of energy management in organisational structures further contributes to this issue. The Bill seeks to address these challenges by providing a comprehensive legal framework to promote energy efficiency and conservation, ensuring the adoption of efficient technologies and practices and improving overall energy management in Uganda.

The other objects of the Bill are:

- i. to regulate the efficient and rational use of energy in Uganda;
- ii. to provide for regulatory functions of the Commissioner responsible for energy efficiency and conservation, and the Minister in relation to energy efficiency and conservation;
- iii. to provide for efficient utilisation of energy and for energy conservation in all sectors;
- iv. to provide for regulated use of specified energy consuming technologies;
- v. to provide for financing of energy efficiency and conservation schemes;
- vi. to provide for public awareness about energy efficiency and conservation; and
- vii. to enhance and promote energy efficiency and conservation in Uganda.

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## 4.0 METHODOLOGY

In considering the Bill, the Committee:

- a) held meetings and received written submissions from several stakeholders;
- b) reviewed various laws and documents;
- c) reviewed the energy efficiency legal frameworks of other countries including South Africa and Kenya.

### 4.1 Meetings and written submissions

The Committee held meetings and received written memoranda with stakeholders from the following entities:

#### a) Ministries:

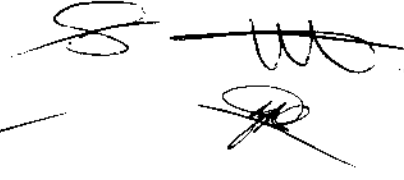
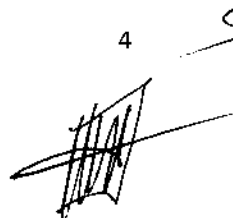
- i. Ministry of Energy and Mineral Development
- ii. Ministry of Science, Technology and Innovation
- iii. Ministry of Works and Transport

#### b) Government Institutions and Agencies:

- i. Uganda Electricity Generation Company Limited
- ii. Uganda Electricity Transmission Company Limited
- iii. Electricity Regulatory Authority
- iv. Atomic Energy Council
- v. Uganda Energy Credit Capitalisation Company Limited
- vi. National Forestry Authority
- vii. Uganda National Bureau of Standards
- viii. Kiira Motors Corporation

#### Subject Matter Experts

- i. Centre for Research in Energy Efficiency and Conservation
- ii. Uganda National Renewable Energy and Energy Efficiency Alliance
- iii. Association of Energy Engineers-Uganda Chapter
- iv. Africa Institute for Energy Governance (AFIEGO)



- v. Energy Efficiency Association of Uganda
- vi. Centre for Research in Energy and Energy Conservation (CREEC)
- vii. Muugaano Initiative

### **Professional Associations**

- 1) Uganda Engineers Registration Board
- 2) Uganda Law Society

### **Business Community**

- 1) Uganda Manufacturers Association

## **4.2 Documentary Review**

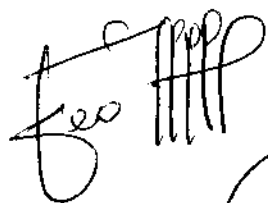
The Committee made reference to the following:

### **a) Laws**


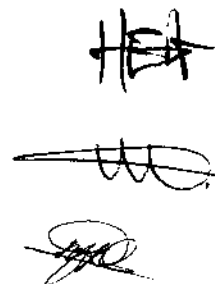
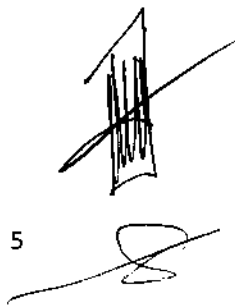
- i. The Constitution of the Republic of Uganda, 1995
- ii. The Building Control Act, Cap. 136
- iii. The Electricity Act, Cap. 157
- iv. The National Environment Act, Cap 181
- v. The Uganda National Bureau of Standards Act, Cap. 210
- vi. The Occupational Safety and Health Act, Cap. 231
- vii. The National Forestry and Tree Planting Act, Cap. 160
- viii. The Traffic and Road Safety Act, Cap. 347
- ix. The Petroleum Supply Act, Cap. 163
- x. National Climate Change Act, Cap. 182

### **b) Policies**

- i. Vision 2040
- ii. The Fourth National Development Plan (NDP IV)
- iii. The Energy Policy, 2023



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## 5.0 OBSERVATIONS

### 5.1 General Observations

#### 5.1.1 Compliance of the Bill with the provisions of the Constitution of the Republic of Uganda, 1995

The Committee observes that the Bill, through its principles where it seeks to establish a legal, institutional, and regulatory framework to enhance energy efficiency and conservation in Uganda, reflects Objective XXVII (iii) where *the State shall promote and implement energy policies that will ensure that people's basic needs and those of the environmental preservation are met.*

#### 5.1.2 Compliance with UN 2030 Agenda for Sustainable Development

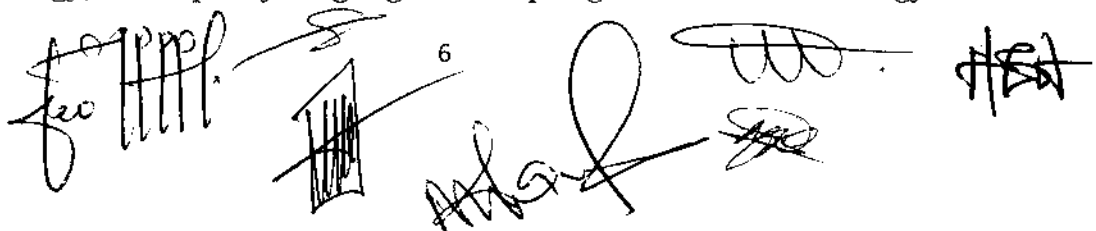
The UN 2030 Agenda for Sustainable Development containing the Sustainable Development Goals (SDGs), is a blueprint for peace and prosperity for all adopted by all Member States of the United Nations.

SDG 7 mandates all Member States to undertake and ensure access to affordable, reliable, sustainable and modern energy for all. SDG 7:3:3 particularly urges all Member States to double the global rate of improvement in energy efficiency. By providing for a legal and institutional framework for energy efficiency, the Bill speaks to SDG 7 through its principles.

#### 5.1.3 Compliance with the Fourth National Development Plan (NDPIV) and Energy Policy, 2023

The Bill, through its objective of establishing a legal, institutional, and regulatory framework to enhance energy efficiency and conservation in Uganda, is in line with one of the pillars of the NDP IV, specifically sustainable energy development which aims to, among others, reduce the share of biomass energy used for cooking.

The Bill is in line with the Energy Policy 2023, notably under Strategy 4.6, *Promote the adoption of energy efficiency and conservation practices.* Under this Strategy, the policy highlights adopting efficient technology and



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appliances and informed energy management practices that allow rapid scaling up of energy efficiency.

## **5.2 SPECIFIC OBSERVATIONS AND RECOMMENDATIONS**

### **5.2.1 Clause 5(a) Preparing and updating the National Energy Efficiency and Conservation Plan**

The Committee notes that the National Energy Efficiency and Conservation Plan is a key in ensuring energy efficiency as it elaborates the targets set out in the Energy Policy and sets out interventions for meeting those targets.

However, the Committee notes that the Bill, under Clauses 5(a) and 17(1), the obligation to prepare the National Energy Efficiency Conservation Plan is placed upon both the Commissioner and Minister respectively. The Committee further notes that this double assignment creates ambiguity and may lead to delays in preparing the Plan.


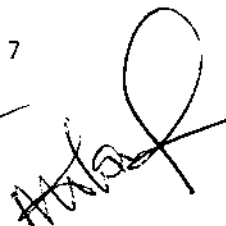
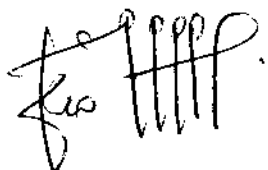
#### **Recommendation**

**The Committee recommends that the role of preparing the National Energy Efficiency Conservation Plan should be left to the Minister; and the Commissioner's role should be limited to periodically improving it.**

### **5.2.2 Energy Efficiency and Conservation in the transport sector**

The Bill provides for energy efficiency and conservation in the transport sector; fuel economy and vehicular emissions certificates, data and testing, as well as labelling of fuel economy and vehicular emissions under Clauses 19-21.

The Committee observes that whereas the measurers provided for are intended to broadly contribute to energy efficiency, it is important to appreciate that fuel economy is a function of various factors including the general transport infrastructure such as the state of roads, as well as the general traffic flow. The Committee notes that without these factors being addressed, it is difficult to address the issue of fuel economy.



The Committee further observes that there are several laws in place that provide the kind of remedies that the said provisions intend to. For example, Section 65 of the National Environment Act and Section 3 of the National Climate Change Act that touch on energy efficiency, and it is not necessary to have the same provisions replicated in the Bill.

**The Committee recommends that Clauses 19, 20, and 21 be deleted.**

### **5.2.3 Clause 39 Management of Information**

Clause 39 of the Bill deals with the management of information relating to energy efficiency and conservation. Information sharing is an important aspect of the implementation of the Bill, especially given that energy efficiency technologies are evolving.

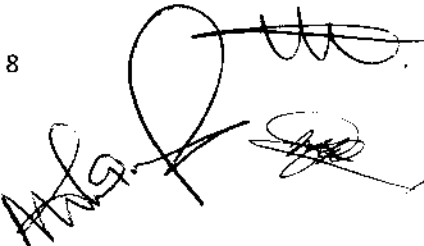
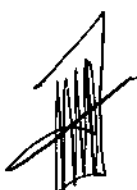
However, the Committee notes that Clause 39(1)(f) recognises the consultation of only Government Ministries, Departments and Agencies (MDAs) in the process of establishing guidelines and principles for the gathering, documentation, evaluation, and dissemination of energy efficiency and conservation information.

The Committee observes that it is important to include other stakeholders outside of Government MDAs in the process.

**The Committee recommends that Clause 39(1)(f) of the Bill be amended to provide for consultation with other relevant stakeholders outside Government Ministries, Departments and Agencies.**

### **5.2.4 Clause 42 Dealing in specified energy-consuming products**

Clause 42 prohibits the sale, lease, import, manufacture or trade in specified energy consuming products prescribed by Regulations unless they comply with the energy performance standards issued by the Uganda National Bureau of Standards and their packaging is labelled for energy performance in manner prescribed by Regulations made under the Act.



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Whereas the Committee appreciates the need for the restriction provided under the Clause, the Committee is concerned that the provision, by confining itself to only **specified** energy consuming products, restricts the reach of the Regulations to be passed by the Minister.

**The Committee recommends that Clause 42 be amended to remove the restriction to only specified energy consuming products.**

#### **5.2.5 Clause 45 False information**

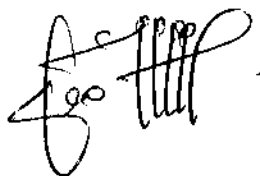
Under Clause 45, it is an offence to furnish any document or information to the Minister or inspector which is false or misleading in any material particular. The Committee notes that the Clause is meant to provide a deterrence. However, the Committee is concerned that while the term of imprisonment for a term not exceeding two years provides sufficient deterrence, the fine of five thousand currency points provided for does not, in the opinion of the Committee, render sufficient deterrence and may defeat the intention of the provision.

**The Committee recommends that Clause 45 be amended to increase the fine from five thousand to ten thousand currency points to provide adequate deterrence.**


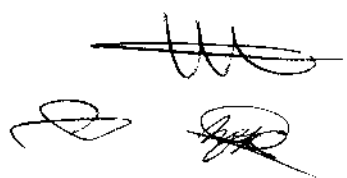

#### **5.2.6 Clause 46 Illegal Importation of Energy Consuming Products**

Clause 45 prohibits the illegal importation of energy consuming products in contravention of the Act or Regulations made under the Act. The Committee welcomes the prohibition of the importation of illegal products and notes that this is critical for ensuring that it is only energy efficient products that are used in Uganda.

However, the Committee notes that whereas this is welcome, energy efficiency cannot only be attained through the prohibition of non-compliant imported products. The Committee is of the opinion that even products locally manufactured, as long as they do not comply, should be prohibited.



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**The Committee recommends that the Bill be amended to include the prohibition of the manufacture of specified energy consuming products.**

### **5.2.7 Clause 54 Regulations**

Clause 54 provides for power to the Minister to make Regulations for the better carrying into effect the provisions of the Bill. The Committee notes that being the implementor of the Bill, it is important for the Minister to have powers to make Regulations to ensure that the provisions of the Bill are given effect.

However, the Committee is concerned that the Clause does not make provision for Parliament to approve the Regulations. The Committee is of the strong opinion that Parliament is empowered to approve the Regulations to provide oversight over the exercise of this delegated power to the Minister.

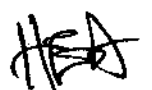
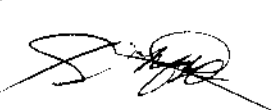


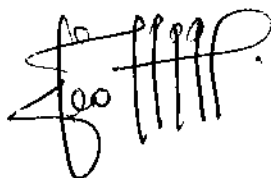
**The Committee recommends that the Clause be amended to provide the laying of the Regulations before Parliament for approval.**

### **5.2.8 Clause 56 Transitional Provision**

Clause 56 of the Bill provides for a transitional period of one year from the date of commencement of the Act to any person using specified energy consuming technology before the commencement of the Act to ensure that the technology complies with the Act.

The Committee appreciates the importance of the provision, which is to provide time for compliance. However, the Committee is of the opinion that one year is too short a time to ensure compliance, especially given the fact that changing the technology often requires financial resources. Thus, a number of people using energy consuming technology may not be in position to adequately change their technology and ensure compliance.

**The Committee recommends that the Clause 56 be amended to provide for a transitional period of two years.**

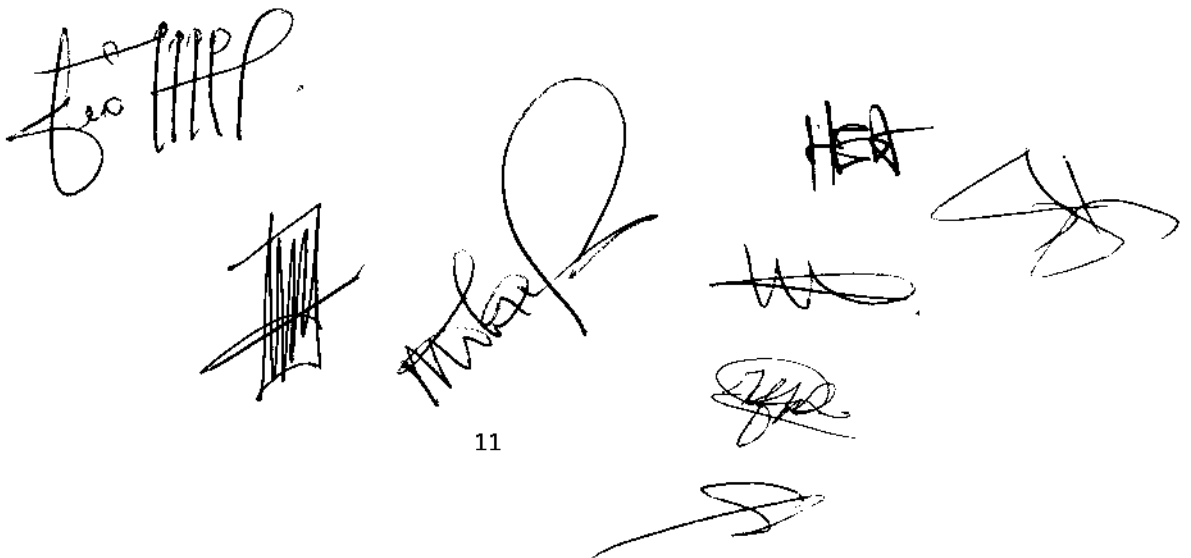


## 7. CONCLUSION

The Committee welcomes the principles of the Bill of establishing a legal, institutional, and regulatory framework to enhance energy efficiency and conservation in Uganda. The Committee takes cognisance of the impact of the unregulated use of energy inefficient equipment and its effect on energy equity, especially given the fact that Government, through the Energy Policy, 2023, aims to achieve universal access to sustainable and quality energy services for all Ugandans.

The Bill marks a significant step towards Government's efforts to ensure that energy is efficiently and sustainably used for the socio-economic development of Uganda. The Committee notes that the provisions that relate to energy audits, incentives for energy saving measures, and the involvement of local governments will go a long way in ensuring energy efficiency and conservation across all sectors of the economy.

**I beg to report.**



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**AMENDMENTS TO THE ENERGY EFFICIENCY AND CONSERVATION  
BILL, 2024**

**1. CLAUSE 3: INTERPRETATION**

Clause 3 is amended —

- a) in the definition of the word “appliance” by inserting the word “lighting” immediately after the word “cleaning”;
- b) in the definition of the word “charging point” by inserting the words “or other locomotives” immediately after the word “battery”;
- c) in the definition of the word “charging station” by inserting the words “or other locomotives” immediately after the words “electric vehicles”;
- d) in the definition of the words “clean cooking” by substituting for the words “and the environmental impact of traditional cooking methods,” the words “the negative impact of traditional cooking methods on the environment”;
- e) in the definition of the word “clean cooking technologies” by inserting the word “negative” immediately after the word “minimises”;
- f) in the definition of the word “dealer” by deleting the word “specified”
- g) by substituting for the definition of “energy manager,” the following—

“energy manager” means a person appointed or designated under section 11;”;

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- h) by inserting the definition of the word “Ministry,” immediately after the definition of the word “Minister,” the following—  
 “Ministry” means the Ministry responsible for energy efficiency and conservation;”;
- i) in the definition of the word “vehicle,” by inserting the words “air, water or railway” immediately after the words “along roads”;

**Justification**

- To make the provisions on appliances more inclusive
- To make the provision more inclusive beyond motor vehicles
- In the definition of clean cooking and cooking technologies for clarity
- To provide a broader definition to an “energy manager” whose appointment and designation is provided for under section 11;
- To provide a meaning and clarity that the “Ministry” being referred to in the Bill is the Ministry responsible for energy efficiency and conservation; used in the Bill;

**2. CLAUSE 5: FUNCTIONS OF COMMISSIONER**

Clause 5 is amended in paragraph (a), by deleting the words “prepare and”

**Justification**

*Preparation of the National Energy Efficiency and Conservation Plan is already covered under Clause 17 as a function of the Minister.*

**3. CLAUSE 13: ENERGY MANAGEMENT SYSTEMS**

Clause 13 is amended in sub clause (3) paragraph (c), by deleting the words “taking into account a suitable period of time”

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**Justification**

*The deleted words are redundant*

**4. CLAUSE 14: ENERGY AUDITS**

Clause 14 is amended—

- (a) in sub clause (1), by deleting the words “to identify areas where energy is used inefficiently or where energy saving measures can be implemented”
- (b) by deleting sub clause (3)
- (c) in sub clause (7), by inserting the words “and implementation plan,” immediately after the words “audit report”

**Justification**

- *The words “to identify areas where energy is used inefficiently or where energy saving measures can be implemented” are restrictive in light of subclause (4).*
- *Subclause (3) has been merged with subclause (7) given that the two clauses are similar.*
- *The amendment to subclause (7) is a consequential amendment arising from merging subclauses (3) and (7).*
- *An implementation plan is one of the requirements a designated energy consumer should comply with.*

**5. CLAUSE 19: ENERGY EFFICIENCY AND CONSERVATION IN TRANSPORT SECTOR**

**Clause 19 is amended by deleting clause 19**

**Justification**

*What the clause provides for is already catered for by various existing laws including the National Environment Act, the National Climate Change Act, and the Traffic and Road Safety Act.*

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**6. CLAUSE 20: FUEL ECONOMY AND VEHICULAR EMISSIONS, DATA AND TESTING**

Clause 20 is amended by deleting clause 20

**Justification**

*The deletion is consequential to the deletion of clause 19.*

**7. CLAUSE 21: LABELLING OF FUEL ECONOMY AND VEHICULAR EMISSIONS**

Clause 21 is amended by deleting clause 21

**Justification**

*The deletion is consequential as a result of deleting clauses 19 and 20.*

**8. CLAUSE 23: LICENSING OF OPERATORS OF COMMERCIAL CHARGING STATIONS**

Clause 23 is amended in sub clause (1), by substituting for the word "Minister," the word "Commissioner"

**Justification**

*These are operational functions that should be performed by the Commissioner.*

**9. CLAUSE 27: ENERGY SERVICE COMPANY**

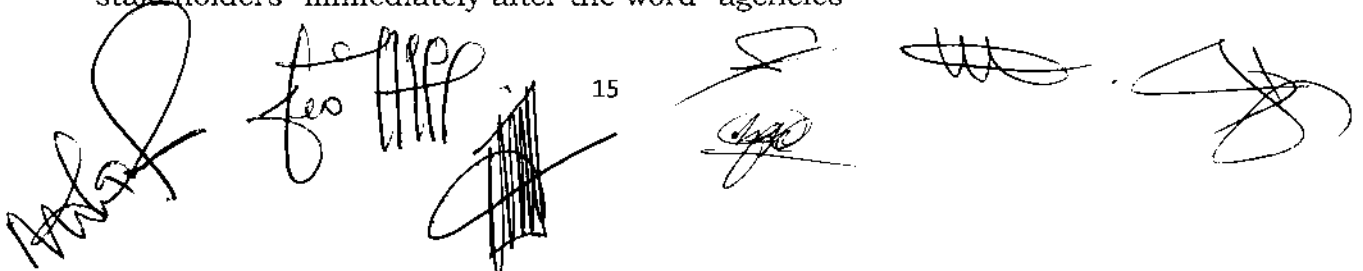
Clause 27 is amended in sub clause (5), by deleting the words "and customer outcomes"

**Justification**

*The customer outcomes are diverse and not easily measurable.*

**10. CLAUSE 39: MANAGEMENT OF INFORMATION**

Clause 39 is amended in sub clause (1) (f), by inserting the words "and stakeholders" immediately after the word "agencies"

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**Justification**

*To give relevant stakeholders the opportunity to be consulted before establishing the National Energy Efficiency and Conservation Database*

**11. CLAUSE 42: DEALING IN SPECIFIED ENERGY-CONSUMING PRODUCTS**

Clause 42 is amended in the head note by deleting the word “specified” and wherever it appears in the clause.

**Justification**

*To broaden the scope for the Minister to regulate all the energy consuming products.*

**12. CLAUSE 43: GENERAL OFFENCES**

Clause 43 is amended in sub clause (1), paragraph (c) sub paragraph (iv), by deleting the word “specified”

**Justification.**

*Consequential amendment*

**13. CLAUSE 45: FALSE INFORMATION**

Clause 45 is amended by substituting for the word “five” the word “ten”

**Justification**


*To make the punishment more deterrent*

**14. CLAUSE 46: ILLEGAL IMPORTATION OF SPECIFIED ENERGY CONSUMING PRODUCTS**

Clause 46 is amended—

(a) in the headnote by deleting the word “specified” and wherever it appears

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(b) by inserting the words “*or manufactures*” immediately after the word “*imports*”

(c) by substituting for the word “ten” the word “

**Justification**

- *To broaden the ambit of the Act and Regulations.*
- *To widen the scope of the provision by including manufacturers.*

**15. CLAUSE 54: REGULATIONS**

Clause 54 is amended by inserting a new sub clause immediately after sub clause (3), the following—

“The Minister shall lay before Parliament the regulations made under this Act for approval.”

**Justification**

*To provide oversight on the delegated powers.*

**16. CLAUSE 56: TRANSITIONAL**


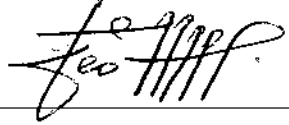

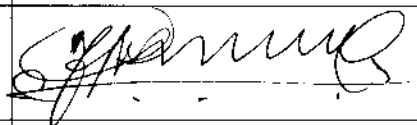
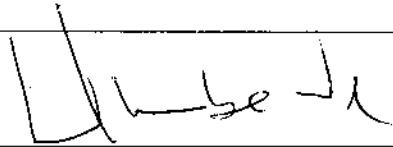
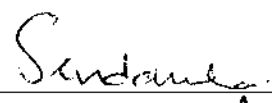
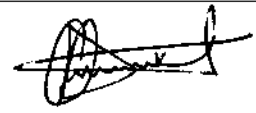
Clause 56 is amended by substituting for the words “one year,” the words “two years.”


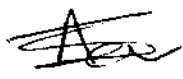
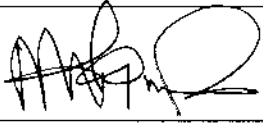
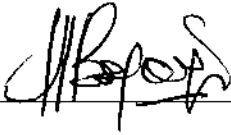

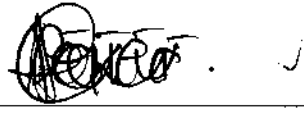
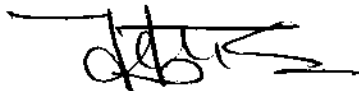
**Justification**

*To provide reasonable time for investors in the sector to adjust the installations for compliance with the law.*



**SIGNATURES OF MEMBERS OF THE COMMITTEE ON ENVIRONMENT & NATURAL RESOURCES ON THE REPORT OF THE COMMITTEE ON THE ENERGY EFFICIENCY AND CONSERVATION BILL, 2024**

S/N	NAME	CONSTITUENCY	SIGNATURE
1.	<b>Hon. Ariko Herbert Edmund</b> <b>(Chairperson)</b>	<b>Soroti East Division</b>	
2.	<b>Hon. Feta Geoffrey</b> <b>(Deputy)</b>	<b>Ayivu Division East</b>	
3.	Hon. Twinomujuni Francis Kazini	Buhaguzi County	
4.	Hon. Apollo Yeri Ofwono	Tororo Municipality	
5.	Hon. Kinobere Herbert	Kibuuki County	
6.	Hon. Dr. Magolo John Faith	Bungokho County	
7.	Hon. Katalihwa Donald Byabazaire	Mwenge County	
8.	Hon. Angura Fredrick	Tororo South County	
9.	Hon. Obigah Rose	DWR Terego	
10.	Hon. Wambede Seth	Northern Division Mbale	
11.	Hon. Sendawula Christine Bukenya	DWR Kyankwanzi	
12.	Hon. Orone Derrick	Gogonyo County	
13.	Hon. Acan Joyce Okeny	PWD - Northern	

14.	Hon. Tumwesigye Josephat	Bugangaizi South County	
15.	Hon. Agasha Juliet Bashiisha	DWR Mitooma	
16.	Hon. Ssentayi Muhamad	Bukoto County West	
17.	Hon. Lokii Peter Abrahams	Jie County	
18.	Hon. Ngoya John Bosco	Bokora County	
19.	Hon. Ikojo John Bosco	Bukedea County	
20.	Hon. Karubanga David	Kigorobya County	
21.	Hon. Mugumya Clare	DWR Isingiro	
22.	Hon. Bagiire Aggrey Henry	Bunya West	
23.	Hon. Kwizera Eddie Wagahungu	Bukimbiri County	
24.	Hon. Ruhunda Alex	Fort-portal Central	
25.	Hon. Aeku Patrick	Soroti County	
26.	Hon. Kaaya Christine Nakimwero	Kiboga District	
27.	Hon. Kanyike Ronald Evans	Bukoto East	
28.	Hon. Tebandeke Charles	Bbale County	

29.	Hon. Nalule Asha Aisha K.	DWR Butambala	
30.	Hon. Nsamba Patrick Oshabe	Kassanda North	
31.	Hon. Mugabi Susan	DWR Buvuma	
32.	Hon. Akena James Jimmy	Lira Municipality	
33.	Hon. Adidwa Abdu	Bukooli County South	
34.	Hon. Musila John	Bubulo East	
35.	Hon. Katenya Isaac	Bulambuli County	
36.	Hon. Bahireira Tumwekwase Slyvia	DWR Kamwenge	
37.	Hon. Musana Eric	Buyaga East	
38.	Hon. Omoding Emmanuel	Serere County	
39.	Hon. Namukuta Brenda	DWR, Kaliro	
40.	Hon. Igeme Nathan Nabeta	Jinja South East	
41.	Hon. Mwine Mpaka Rwamirama	Mbarara City South	
42.	Hon. Luyimbaazi Nalukoola	Kawempe North	



**PARLIAMENT OF UGANDA**

**OFFICE OF THE  
LEADER OF THE OPPOSITION**

**STATEMENT OF REASONS FOR DISSENT FROM THE POSITION OF THE MAJORITY ON THE  
REPORT OF THE COMMITTEE ON ENVIRONMENT AND NATURAL RESOURCES ON THE  
ENERGY EFFICIENCY AND CONSERVATION BILL, 2024**

Moved under Rule 215 of the Rules of Procedure of the Parliament of Uganda  
(2025)

A handwritten signature in black ink, appearing to be a stylized name.

**SEPTEMBER 2025**

A handwritten signature in black ink, appearing to be a stylized name.

## Introduction

Right Hon. Speaker and Honourable Colleagues, this Minority Report is submitted in dissent from the Committee's Majority Report on the Energy Efficiency and Conservation Bill, 2024. While the intentions of the Bill may be commendable, its design and focus are profoundly mismatched with Uganda's energy realities. The proposed law risks creating additional bureaucracy without tackling the core barriers to energy efficiency and access in the country.

Uganda's energy story is a painful one. Over 90 percent of families still cook with firewood and charcoal because they lack alternatives, while modern electricity reaches only a small segment of the population. Given this reality, you would expect a law that addresses the struggles of ordinary Ugandans. Sadly, the Bill before us concentrates almost entirely on electricity efficiency measures such as labelling, audits, and charging points, with only a brief mention of biomass. This overlooks the real issue.

Rt. Hon. Speaker and Hon. Colleagues, our people are not suffering because bulbs lack labels or because we do not have charging stations. They are suffering because electricity is too costly, unreliable, and often simply unavailable in many areas. If we truly care about energy efficiency, we must tackle the heavy reliance on biomass, make electricity affordable for the average household, and propose solutions that genuinely reflect Uganda's circumstances. Anything less is merely superficial, while millions remain trapped in energy poverty.

## Grounds of Dissent

1. Energy efficiency targeting electricity consumption in Uganda is self-defeating.
2. **Duplication and Legal Overlaps**
3. The Bill reflects climate change concerns but fails to align with or reference the Climate Change Act, 2021, creating risks of duplication and policy incoherence.
4. The Electrify Tariff already provides penalties for inefficient electricity users.
5. The Bill has a direct effect of increasing the cost of doing business
6. The Bill will significantly raise the electricity end-user tariff.
7. Unfair transitional close



## 1. Energy efficiency targeting electricity consumption in Uganda is self-defeating.

Uganda's energy mix is overwhelmingly dominated by biomass (firewood, charcoal, crop residues), accounting for about 90% of total primary energy consumption, with the remainder primarily from petroleum products (around 8%) and a very small contribution from electricity (approximately 2%).

Even if this proposed law led to 100% efficiency in electricity consumption, we would have only fixed 2% of Uganda's energy use/needs.

A credible Energy Efficiency Bill should focus on:

- Strategies to reduce reliance on biomass through affordable and accessible alternatives.
- Mechanisms to make electricity tariffs affordable, thereby incentivizing a shift from biomass to modern energy.
- Investment in clean cooking technologies and rural energy access.

By focusing on electricity, the Bill fails to appreciate the energy poverty in Uganda.

### Our Proposal.

We propose that under the Climate Change Act, regulations intended to reduce the use of biomass while increasing (not reducing) the use of electricity and other ecofriendly energy sources should be promoted. This Bill should be declined by this House and instead compel the Minister responsible for Environment to do her job of handling all energy efficiency matters which are intended to support us to cope with current and future impacts of climate change.

## 2. Duplication and Legal Overlaps

Uganda already has a robust framework addressing energy efficiency, standards, and environmental management, making much of this Bill redundant:

- Electricity Act (1999)** – Established ERA to regulate electricity generation, transmission, distribution, and sales, enforce efficiency standards, and promote renewable energy.
- National Environment Act (2019)** – Strengthened NEMA's mandate for sustainable resource use and environmental integration in development. **Article 65 specifically addresses energy conservation.**



iii. **Uganda National Bureau of Standards Act (1983)** – UNBS sets and enforces standards for products and services, including energy efficiency labelling and industrial processes.

iv. **Physical Planning Act (2010)** – Ensures all developments, including energy infrastructure, follow approved plans, energy-efficient designs, and environmental safeguards.

v. **National Climate Change Act (2021)** – Provides a legal framework for low-carbon development, mainstreaming climate action, and promoting renewable energy. **Part 3 emphasizes public participation; Section 22 offers incentives for climate actions.**

vi. **Building Control Regulations (2020)** – Guides construction practices to ensure safety, sustainability, and energy efficiency in public and private projects.

### **Proposal**

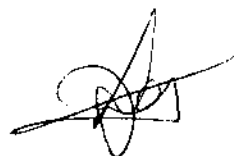
These laws and regulations already provide comprehensive mechanisms for energy efficiency, renewable energy promotion, and sustainable resource management. The proposed Bill largely overlaps with existing frameworks, raising questions about its necessity and potential for duplication.

### **3. The Bill reflects climate change concerns but fails to align with or reference the Climate Change Act, 2021, creating risks of duplication and policy incoherence.**

Rt. Hon. Speaker, the Bill in its current form is trying to address matters of climate change when the country already has a Climate Change law (Climate Change Act, 2021).

This Bill was not brought in good faith because all the provisions could have been ably handled through a Statutory Instrument issued by the Minister responsible for Environment as part of implementation of the Climate Change Act, 2021.

For the avoidance of doubt, it remains unclear whether the Minister responsible for Environment or the National Environment Management Authority (NEMA) were ever consulted during the processing of this Bill. What is certain, however, is that their input would have been paramount. Given their statutory mandate under the Climate Change Act and the National Environment Act, their contribution should have formed the cornerstone of any serious legislative effort on energy efficiency. The fact that their perspectives are absent from this process casts doubt on its adequacy and completeness.



Rt. Hon. Speaker and colleagues, I invite this House to guide the Executive that efficient utilization and regulation of biomass use is a function related to the Ministry responsible for environment through;

- i. The National Environment Act
- ii. The Climate Change Act
- iii. Regulation issued by the Minister responsible for the Environment.

### **Proposal.**

We reiterate our position that this House should not proceed with the third reading of the Bill. Instead, we propose that the House passes a resolution urging Government, through the Minister responsible for Environment, to issue the necessary Statutory Instruments to extend energy efficiency measures beyond electricity.

**4.** Rt. Hon. Speaker, Uganda already penalizes inefficient electricity users. The Electricity Tariff, guided by the Grid Code and the Quality of Service Code under the Electricity Regulatory Authority, provides for penalties on industrial consumers who use power inefficiently. In practice, large consumers who draw more electricity from the grid than they actually utilize, particularly in the form of reactive power, are sanctioned by the regulator to encourage them to install more efficient equipment.

Rt. Hon. Speaker, if large consumers are already penalized for operating inefficient equipment, it begs the question whether this new law is instead targeting small consumers. If that is the case, then government is simply shifting the burden onto ordinary households that are already struggling with high electricity tariffs and unreliable supply.

### **5. The Bill has a direct effect of increasing the cost of doing business**

Rt. Hon. Speaker, this Bill has the direct effect of escalating the cost of doing business in Uganda. It introduces new financial and administrative burdens on consumers classified as *designated energy consumers*.

Clause 10(2)(a) obliges such consumers to establish an "energy management system" in a manner to be prescribed by the Minister. However, the Bill does not provide a clear definition of who qualifies as a *designated energy consumer*. This



omission creates uncertainty and opens room for arbitrary application, potentially exposing even small and struggling businesses to costly compliance requirements.

Furthermore, Clause 10(2) places additional obligations on businesses, including the recruitment of a technical officer designated as an "energy manager," the engagement of licensed energy auditors to carry out periodic audits, and the preparation and submission of compliance reports to the Minister. These requirements impose recurring costs on businesses that are already grappling with high operational expenses.

Specifically, Section 15 compels every *designated energy consumer* to periodically submit reports to the Minister. For businesses operating in distant areas such as Koboko, Kisoro, or Karenga, compliance would not only be burdensome but would also attract extra logistical and administrative costs.

### **Our proposal.**

**Rt. Hon. Speaker**, at a time when businesses are struggling with not just the cost of living but the electricity tariff itself, we invite this House to reject a Bill that seeks to impose additional costs on businesses.

We propose that other business friendly avenues provided in other laws like the Climate Change Act and the National Environment Act be implemented in order to achieve the intended principles in the Bill.

### **6. The Bill will significantly raise the electricity end-user tariff.**

Rt. Hon. Speaker, the end user electricity tariff is a function of 2 variables;

- i. Total sector financial requirements (the Bill is not reducing them)
- ii. The total expected number of units to be sold/consumed.

When more electricity units are sold to consumers, given the sector financial requirements, the tariff comes down as many more people share the burden of debt service on the dams likes Karuma, Isimba and Bujagali.

The Minister of State for Energy informed the Committee that the Energy Efficiency and Conservation Bill, 2024 if passed into law would have the effect of reducing electricity consumption by up to 380 megawatts by 2030. This unfortunate revelation by the Minister has the effect of;





- i. Significantly raising the electricity tariff when everyone is looking for ways of having a lower competitive tariff.
- ii. Lower the speed of economic expansion as lower demand for electricity is expected to lower economic performance.

**7. Unfair transitional close.**

Rt. Hon. Speaker, **clause 56** provides for existing consumers adopting the technologies that comply with this Act. The Bill compels consumers to be complainant within 1 year while the majority of the Committee adopted 2 years.

We find 2 years to be so short a time for businesses already facing significant costs to procure new equipment that comply with the law in its current form.

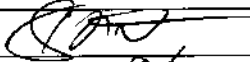
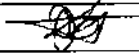
**Conclusion**

Rt. Hon. Speaker, in its current form, the Energy Efficiency and Conservation Bill, 2024 is misaligned with Uganda's realities, duplicative of existing laws, impractical in its provisions, and silent on critical issues of biomass, affordability, and financing. It risks becoming an ineffective and unenforceable statute that adds bureaucracy without delivering tangible results.

We therefore recommend that instead of passing this Bill, the government should:

- Issue Statutory Instruments under the Climate Change Act and other laws like the Uganda National Bureau of Standards Act to provide for all relevant matters raised in the Bill.
- Strengthen the enforcement and coordination of existing laws and policies on energy efficiency
- Prioritize biomass transition and clean cooking solutions in accordance with Uganda's energy mix.
- Lower electricity tariffs and incentivize uptake of modern energy sources.

For these reasons, we dissent from the Committee's Majority Report and call for a reconsideration of the Bill.

	Name	Signature
1	KANYIGE DONALD OMS	
2	KANYA CHRISTINE HAKIMWIRE	

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