

RESEARCH REPORT



Preventive Legal Empowerment: Early Alert and Action to Strengthen Rights in the Context of Land-Based Investments in Uganda

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July 2025

Project Title: Preventive Legal Empowerment: Early Alert and Action to Strengthen Rights in the Context of Land-Based Investments in Uganda

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Executive Summary

This Preventive Legal Empowerment: Early Alert and Action to Strengthen Rights in the Context of Land-Based Investments in Uganda (registration number SS1115ES 2002–2025) project sought to preventively address conflicts related to land-based investments and elite capture of community lands. Rather than providing legal support after a land-based injustice has occurred. This project was designed to support communities to 1) proactively identify where investment-driven land conflicts may occur; 2) seek legal support as soon as they perceive this may be needed; and 3) engage with the potential conflict from a place of agency and legal empowerment—thereby ensuring that the conflict is avoided, the communities' land rights are not transgressed, and harm does not occur.

The project explored how preventive legal empowerment support and conflict resolution strategies can help rural communities in Uganda to ensure that their land rights are respected, that communities do not suffer the negative impacts of land-based investments (in particular increased displacement, injustice, environmental degradation, impoverishment, and human rights abuses). It also sought to understand how preventive legal empowerment approaches can play a more proactive role in democratic, inclusive governance of land and land-based investments.

The project was implemented by Land and Equity Movement in Uganda (LEMU) between January 2022 to May 2025, in collaboration with International Institute for Environment and Development (IIED) in the United Kingdom and with funding from International Development Research Center (IDRC). This action research study conducted fieldwork and advocacy initiatives to preemptively address conflicts between communities and investors over land. It utilized early warning hotlines and rapid response mechanisms, conflict hotspot mapping, and participatory monitoring of investor compliance. The study was conducted in 4 sub-regions of Uganda including Acholi, Karamoja, Lango and Teso covering over 15 districts. LEMU received over 48 land-based investment cases and over 1,000 related grievances and reached over 3,673 (2,045 males and 1,628 female) direct beneficiaries. This policy brief presents key findings of the project and their implications for policy.

Main Research Outputs: The project produced five (5) main research outputs including; 1) A consortium research report titled “are community-investor conflicts inevitable”? which shows community legal empowerment and conflict prevention experiences in Uganda and Cameroon, 2) A general research report on experiences from Uganda, 3) a policy brief on general research findings and recommendations in Uganda, 4) A case study policy brief on the question of green energy transition in Uganda, and 5) a case study policy brief on forest-related land-based investments. All these research outputs are available on www.land-in-uganda.org

The study found out that institutions play a critical role in the governance of land and investments. The success, failure, or degree of social acceptance or resistance to land-based investments in Uganda is closely tied to the quality, competence, and integrity of the country's political and economic institutions. Strong, transparent institutions have the capacity to guide investment processes in ways that are equitable and just, while weak or compromised institutions can further community exploitation, repression, and conflict. Institutions play a critical role in the de-escalation or escalation of grievances, disputes or conflicts between

communities and investors.

There is an increase in the individualization of natural/common resources: There is a growing practice of private individuals and enterprises controlling the access and use of natural and common resources for their personal benefit at the expense of the entire community. Across the study areas, private agricultural investors were found to be enclosing and gatekeeping communal wetlands, hot springs, forests, and wells. For example, an investor in Kapujan village in Katakwi district fenced off and excluded hundreds of community members from the use of a community valley dam built by the local government.

The excessive role played by security organs in land-based investments. The research encountered a huge presence of security organs that manned, guarded and protected investments even in cases where communities still contested land allocations to those investments. This was witnessed in regions that were endowed with minerals and large tracts of fertile land, notably Karamoja and Acholi sub-regions respectively. In Karamoja (Tapac, Rupa, Lokales sub-counties) the army/soldiers guarding such investments denied community access to previously communal grazing lands, and closed off community access roads to grazing lands. The presence of security personnel both created fear and anger within the communities as well as escalated conflicts between communities and investors.

The importance of involving local governments in investment decisions. Well as the study showed a critical need to include local governments (officials) in land-based investment processes, these were negated. The national institutions/structures wield a lot of power and influence how land-based investments turn out at the local level. The study found most investors who obtained their licenses from central government ministries and agencies undermined the local government leadership structures which disempowers them.

Communities were divided between those pro and against the investment. Land-based investments contribute to fractured community solidarity. They divide communities into those that support the investment because they derive some benefits; and those that oppose because of perceived rights violation or the cost of foregoing their rights does not match with the offer from investors. This division is manifested and further entrenched into how conflicts related to the investment are managed or resolved.

Poverty aiding land dispossession in communities. Most of the natural resources and valuable minerals in Uganda are found in the poorest regions of the country, for example, the northern and north-eastern regions. While poverty has contributed to communities' limited ability to control or exploit their land-based resources, the powerful (the rich, multinational corporation, state etc.) are exploiting and dispossessing poor and vulnerable communities of their lands and natural resources. It is important to note that dispossession does not end with land, but extends to food and social desperation. In one case in Moroto district (Tapac sub-county), an investor grabbed vast community lands, exploited labor and mined limestone but distributed food (posho) to a famine-stricken community. In this case food ratios superseded land rights because of poverty.

The study recommends that Laws governing investments, land allocation and acquisition by investors should be reformed to provide for clear and proper procedures to be followed; allow for access to information about investments; provide for participation of all stakeholders impacted by land-based investments; emphasize the conditionality of Free Prior Informed Consent and

environmental protections and restoration during and after land-based investments.

Recognize, observe and protect community land rights during land-based investments. In most cases, the communities are vulnerable in the face of powerful investors. In most cases the laws, leaders and structures all worked to protect the interests of the investors. To address power imbalances, community rights should be protected in order to control dispossession and prevent land rights violations. This can be done for example by making sure that surface rights are well compensated for before extraction of mineral commences.

Create accessible, affordable and trusted dispute resolution mechanisms. It is necessary to create easily accessible, trusted fora where communities can bring and resolve complaints quickly and effectively. Land conflict resolution responsibilities are best assigned to trusted, long-standing local authorities, many of whom were born and raised in the region and have deep knowledge of the area's social, political, and cultural contexts. Religious and cultural authorities should be trained to play a role in land conflict resolution, as they often have significant legitimacy within communities.

Leverage strategic alliances with the government and strengthen local leaders' accountability. Advocacy efforts are most successful when partnering with government allies to enforce laws and confront investors' illegal practices. It is necessary to leverage the legal power of the state to confront illegal power that may be wielded by investors or other actors in investments.

Build capacity of land administrators and other government officers mandated with conflict resolution. Efforts should be made to educate and train government duty bears and increase their political will to support communities in the peaceful resolution of community-investor conflicts. Such efforts should be implemented at scale. Some land administration officers failed to respond to community disputes or grievances just because they lacked capacity on how to deal with and manage the cases. Building their capacity therefore becomes a sustainable approach of managing investor-community conflicts.

Address power asymmetries by leveraging the media and providing information to communities. Activists can proactively strengthen communities' ability to advocate for their rights by providing them with access to critical information about both a) their rights under national and international laws; and b) the details of the investment affecting them. The media can be used to report on and bring to the public space land-based investments that violate community rights which would otherwise have gone silent.

Ensure marginalized groups are fully represented and create space for their participation. Representatives of marginalized groups should be included in all discussions about community-investor conflicts. This is because land-based conflicts affect community members differently depending on their livelihoods, identity, and vulnerability; women often bear the brunt of any negative impacts of investment activities. Yet conflict resolutions tend to reflect only the interests of powerful groups because they always participate and are represented in conflict resolution processes. This further contributes to marginalizing vulnerable populations, particularly women due to under representation.

Establish or strengthen existing multi-stakeholder platforms in regions where investment violations are rampant. Communities were found to be suffering violations in isolation and without knowledge of where they could have their grievances sorted. In such contexts, the individual community members or rights defenders who rose up to demand accountability

were also persecuted. This left communities without support structures and space to air out their grievances against investors. It was clear that the affected community members lacked a collective voice to speak against investors and speak to power. Multi-stakeholder platforms can effectively provide space for communities to mobilize themselves to address land-based investment related issues.

In a nutshell preventive legal empowerment approaches should be given a central place when managing land-based investments. These not only provide an opportunity of anticipating conflict but also handle disputes before they escalate and contribute to damage and losses. Preventive legal empowerment approaches are cheap, efficient and sustainable alternatives to dealing with land-based investment related disputes. This is therefore a call to all stakeholders involved in land-based investments to invest in and engage more with preventive legal empowerment because of their potential of turning a would-be bad land-based investment into a responsible one.

Introduction

The Preventive Legal Empowerment: Early Alert and Action to Strengthen Rights in the Context of Land-Based Investments project officially commenced in Uganda on 1st February 2022. It was implemented by the Land and Equity Movement in Uganda (LEMU) in collaboration with International Institute for Environment and Development (IIED) and funded by the International Development Research Centre (IDRC). The project sought to preventively address conflicts related to land-based investments and elite capture of community lands. Rather than providing legal support after a land-based injustice has occurred, this project was designed to support communities to 1) proactively identify where investment-driven land conflicts may occur; 2) seek legal support as soon as they perceive this may be needed; and 3) engage with the potential conflict from a place of agency and legal empowerment—thereby ensuring that the conflict is avoided, the communities' land rights are not transgressed, and harm does not occur.

The general objective of the research/project was to explore how preventive legal empowerment support and conflict resolution strategies can help rural communities in Uganda to ensure that their land rights are respected, that their communities do not suffer the negative impacts of land-based investments (in particular increased displacement, injustice, environmental degradation, impoverishment, and human rights abuses), and that they can play a more proactive role in democratic, inclusive governance of land and land-based investments.

Below were the specific objectives of the study:

- Provide proactive legal and technical support to communities facing potential land conflicts, and, by doing so, reduce the severity, intensity, and negative impacts of those conflicts.
- Drawing on that legal support, provide evidence on the success of preventive legal empowerment approaches for defending the land rights of communities in the context of land-based investments.
- Based on the early warning hotlines and rapid response mechanisms, gather data on

the type and kind of land-based investments being developed in rural and semi-urban areas, including how the investments are approved, who within government approved them, whether the community was properly consulted and gave FPIC, whether the community concluded an agreement with the investor, what benefits, if any, such agreement provides, how the government agencies involved interacted with the community, as well as the effectiveness of community responses to these investments, including in the context of investor-community negotiations.

- Analyze and disseminate this data to inform national and international policy and establish safeguards and protocols that better protect and preserve community and resource rights.
- Throughout project implementation, identify and provide tailored technical and legal empowerment support to women, youth and indigenous community leaders, including to support them in playing a leadership role as land rights defenders, advancing an approach to address social differentiation based on gender transformation and intersectionality.

Implemented by a consortium of three non-governmental organizations, LEMU in Uganda, Centre for Environment and Development in Cameroon (CED), and International Institute for Environment and Development (IIED) in the United Kingdom, the study combined fieldwork and national-level advocacy efforts in the three countries. The project's action-research fieldwork through the use of early warning hotlines and rapid response actions; hotspot mapping; and participatory compliance monitoring of investments established new methods for pre-empting rights violations and reducing the amount of time and effort spent resolving conflicts or litigating injustices. The project also provided much-needed data on the evolving nature of land-based investments and conflicts and effective approaches for anticipating their negative impacts and proactively strengthening community rights and agency.

In Uganda the study generated policy-relevant insights on: 1) changing pressures on land/natural resources; and 2) compliance issues in land-based investments. Reflection on field-level results also generated insights on how to develop preventative approaches to issues of land conflict, investment, and legal empowerment. Strategic policy interventions at the national level will promote systemic change by feeding findings from the legal empowerment pilots into national advocacy to reform policies, laws, and institutions in Uganda.

A note on word choice

- -In this report, we use the term ‘community’ to mean a group of individuals, families, and households who collectively live within or have strong historical ties to a specific territory with definable boundaries and are governed by a shared set of customary, Indigenous or state governance structures.
- -In this report, we use the term ‘investors’ to mean the full range of local, national or international companies, business decision-makers, individual businessmen, and the project financiers who stand behind any investment, business, initiative or project that has any impact on communities. Governments and government officials also often either facilitate such investments or are themselves direct investors, shareholders or investment proprietors. The term ‘investors’ also applies to local businessmen who may be operating without permits and permissions, etc.
- -In this report, we use the term ‘resources’ to mean the vast array of biodiversity within a community’s local ecosystem(s), including the land, plants, animals, minerals, waters and soils located there—some of which may be considered to be extractable ‘resources’ by investors and government officials.
- -In this report, we use the term ‘conflict’ to mean any strong opposition resulting from violations of rights, interests, visions and/or perceptions between two or more actors in a given context.

Literature Review

The privatization of land which the NRM government adopted since the 1980s due to the influence of the World bank and IMF structural adjustment programs with the consequent 1995 Constitutional creation of leasehold and freehold land tenure systems which make privatization of land easy have all combined to open up Uganda’s land, which Mamdani (2015) shows is predominantly customary to the market. Mamdani (2015) shows that the development of a land market in Uganda has brought to reality Marx’s popular term – Primitive Accumulation through which the primary producers are dispossessed off their means of production in a term the NGOs have called Land Grabbing. He argues that this process of accumulation is now coming from above – mediated by state institutions and from below – mediated by customary – clan institutions, all for private accumulation of capital/wealth. He cites NGO research reports showing that land grabbing from below especially from the women and children are widespread across Lango, Teso and Acholi where the clan instead of performing their expected role of protection instead collude with private interest of the rich land buyers leading to dispossession. Branch (2011) further shows that as poverty rages in most parts of Acholi due to effects of the LRA war, the poor people are selling their land national elites who buy large trucks of land in speculation of the coming foreign agricultural investors. He argues the poor people, majority women are involved in “self-inflicted dispossession” through selling their land as survival means. The future of land rights for women, in such a scenario where land is leaving the hands of rural producers into the hands of capital interests, therefore becomes a point of contestation in most parts of rural Uganda.

To understand the magnitude of land acquisition by domestic and foreign investors in Uganda, we also turn to mainly NGO studies on this topic. Nationally, the concept of large-scale land acquisition (synonymous with large-scale investments) is new in Uganda, but it is fast growing in number and scope. According to CBR (2016), there were 7 international large-scale land deals in 2012 but the number had grown to 22 in 2016, although this figure excludes the unrecorded acquisitions being made by national companies and individuals. According to Burke and Hodges (2017), there is a gap in the business process for Ugandan-owned investments because they are not required (by law) to get registered and to have an investment license. In a recent study documenting the agricultural enterprises in Acholi region, Jagwe and Burke (2017) indicate that a number of medium and large-scale investors can be located within Acholi region, but mainly in the districts of Amuru and Nwoya. These investors emerged in Acholi land after the end of the LRA civil war in 2004 and are mainly foreign owned with origins in; USA (Alliance One in Amuru and Gulu districts), United Arab Emirates (FOL Logistics in Nwoya district), India (Vinayak in Nwoya), Denmark (Northern Uganda Agricultural Holdings), South Africa (AFGRI in Nwoya district), Germany (Amatheon Agri Uganda Ltd), Australia (Omer Farming in Amuru district), Kenya (Horyal investments company in Amuru district). There are also national companies such as West Acholi Cooperative Union and Bukona Out growers' Agricultural Processing Company operating in Amuru and Nwoya.

One of the methods of contemporary land acquisition for investments is through the market. According to Tumushabe, Twangire, and Mayers (2017) land acquisition through the market has emerged as the main mode for land acquisition throughout Uganda, substituting traditional modes of land access through inheritance, gifts and marriage. For the agricultural investments in Acholi region (mainly based in Amuru and Nwoya), Jagwe and Burke (2017) outline the various processes of land acquisition and/or access by the investors. Three modes of access to land have been identified; 1) direct land investments in which case the investors acquire land through the market and secure freehold, leasehold or local agreements with landowners, 2) indirect land investments where investors rely on the use of out grower schemes and, 3) joint venture investments where the locals provide land and the foreigner provides capital.

For the case of accumulation from above - the land grabbing mediated by the state, different studies show that central government through its Uganda Investment Authority (and sometimes local governments) enable foreign or national multi-million companies to acquire vast chunks of land for especially agricultural related investments that have left thousands of people, mainly women and children homeless, desperate and destitute. Mamdani (2015) cites that while this trend is not common in most parts of Northern Uganda where the NGOs have carried out research, it is prevalent in Acholi. This he argues was due to the Lord's Resistance Army which by September 2002 had led to the displacement of the entire rural population into Internally Displaced People's (IDP) camps in Gulu town, the displacement which Branch (2011) argues disconnected the rural men and women who got used to the monetarized way of life during displacement in Gulu town from the use of their land. Branch (2011) shows that many people refused to go back and settle in the rural areas, but rather to sell of their land and come back to Gulu town to continue with the monetarized way of town life. With the rural areas of Acholi land sparsely populated, the private interest to take over these vast lands for large-scale economic investments would automatically fall into the centre scene. The most popular case, just an example of a large scale land take over in Acholi in which women's land rights were most affected is the case of the Madhvani group which Branch (2011), Ebila and Tripp (2017) have all cited to have been led by the government of Uganda to acquire land for a sugar cane plantation and processing factory. Another research concluded by Centre

for Basic Research (2016) also cites the same cite in Amuru district where Madhvani group of companies was allocated 10,000 hectares (there seems to be inconsistency in the size of the land because Branch (2011) quotes 40,000 hectares) for a sugar cane plantation, an investment with devastating effects on the rights of women over customary land. Centre for Basic Research (2016) shows that the government based its choice for the land on the excuse that this public, not customary land but the women argued that this was customary land that only went vacant during the LRA war which had displaced its occupants. Thinking of the argument made by the Amuru women that “they owned the land Madhvani wanted” as highlighted in the research by Centre for Basic Research (2016) in relation to the argument made by the women’s movement that “customary land tenure does not allow women to own land” highlights a misrepresentation. If indeed customs accorded no land rights to women as asserted by the women’s movement in Uganda, why would the rural women of Amuru strip naked to defend rights which they do not have? The fact that Ebila and Trippp (2017) show the naked protest of women in Amuru district was a resistance initiated only by the women without any influence from the men or the women’s movement actually means that under the customary land tenure, women do have rights to land, only difference is that these rights may not be articulated on individual but on family terms.

Out of Acholi, research is showing the same trend of “accumulation from above”, the central government through its Uganda Investment Authority is identifying land and allocating it to foreign investors in the name of economic development. In its recent research findings, Centre for Basic Research (2016) has shown that in Mubende district, a German company called Neuman Kaffee Grupe (NKG) through its subsidiary company operating in Uganda called Kaweri Coffee Plantation Ltd acquired 2,512 hectares and is the largest commercial coffee farm for robusta coffee in Uganda. The company got the 99 years lease for the coffee plantation in 2000 from Uganda Investment Authority and through the state armed forces evicted thousands of people (on the basis they were encroachers on a private mailo land) from the four villages of kijunga, Kiryamakoobe, Kitemba and Luwunga – destroying homes, crops in the garden and businesses, the caused mass displacement which led to high death rates among children who were exposed to malaria and pneumonia – the ultimate bearer of all this suffering being the woman. Centre for Basic Research (2016) shows that even though the evicted community won a court judgment ordering the company to compensate them in 2011, the company remains adamant to the order and the landless community languishes in extreme poverty.

In yet another similar scenario, a research concluded by OXFAM International in 2011 shows how a British company in the name of New Forest Company through Uganda Investment Authority and Uganda Forest Authority in 2005 acquired 20,000 hectares of land in three districts of Kiboga, Mubende and Bugiri where people had settled for development of a private company. Like in all the cases of large-scale land acquisition brokered by the central government discussed above, the government claimed that the land allocated to New Forest Company were forest reserves and the people residing in them were had illegitimate claims. Following this, OXFAM (2011) shows that the government evicted 22,500 people from these locations to pave way for the development of a commercial timber plantation. In describing the fate of these victims of large scale land acquisition, OXFAM (2011) has this to say “today, the people evicted from the land are desperate, having been driven into poverty and landlessness. In some instances they say they were subjected to violence and their property, crops, and livestock destroyed. They say they were not properly consulted, have been offered no adequate compensation and have received no alternative land” (p 3). The emergence of

land markets and land acquisition by investors has therefore generated negative impacts on local communities, in terms of conflicts. Recent studies (Ebila and Tripp 2017; CBR 2016; Tumushabe, Twangire and Mayers 2017; and Branch 2011) focusing on Northern Uganda have shown that large-scale land acquisitions have sparked numerous conflicts between local communities and investors. They document the violent confrontations between communities and the state/investors during the process of acquiring land for large-scale investments, the most famous being the Mhadvani case in Amuru district.

The increase in privatization, sale of land and therefore increased access to land through the market and this is generating community-investor conflicts in most parts of Uganda. With reference to Acholi sub-region, Namukasa (2017:iv) notes that land conflicts in Acholi are mainly grouped into four types; 1) “large-scale land acquisitions by government on behalf of private sector investors, 2) intra family disputes, 3) territorial disputes between clans, or groups of clans known as chiefdoms, disputes between land holding groups and institutions, 4) intra-community disputes over land access or rights to particular land parcels”. She notes that these land conflicts have made access to customary land by vulnerable groups such as disabled men and women more difficult. While evaluating responses to domestic land grabbing cases in Northern Uganda, Trocaire, OXFAM and CONCERN (2014) also indicate that cases of customary land conflicts in northern Uganda are mainly “domestic” and fall under two categories; 1) legitimate cases of land claim based on state/customary law and, 2) cases of “bad faith” land grabbing. Large-scale land conflicts are therefore more pronounced in the Acholi region, specifically in the districts of Amuru and Nwoya where Burke and Jagwe (2017), Burke and Hodges (2017) show that there are currently foreign investors.

In order to address this emerging social crisis of investor-community land conflicts, different actors are therefore attempting to resolve these disputes, but the main focus has been on “conflict resolution” after damage has already occurred. Although land disputes do exist in Acholi region (mainly in Amuru and Nwoya), it is not a threat to normal community life. Traditional leaders are the most successful in resolving disputes, with occasional involvement of LCs but no successful resolution has been attained by the formal courts of law (Atkinson, Latigo and Bergin 2016; Burke and Hodges 2017). As a strategy for land dispute resolution in Acholiland, Ojok Advocates (n.d) developed a step-by-step guide that prioritizes the use of Acholi traditional justice mechanisms such as poro lok, riyo tal as the first option in the resolution of land disputes. The guide further recommends other dispute resolution methods such as litigation, arbitration, conciliation and mediation in the alternative dispute resolution mechanism instituted by the Justice Law and order sector. The guide helps to inform the choice of a cheaper, quicker, more effective and more accessible forum and mechanism for land dispute resolution in Acholi sub region for contending parties. This guide is available at; https://www.trocaire.org/sites/default/files/resources/policy/180418_final_report_step_by_step_guide_to_land_conflict_resolution_in_acholi.pdf

For the case of districts located in Lango, LEMU's previous research on land grabbing also shows that as opposed to large-scale land grabbing, most cases of land conflicts and land grabbing are within the family and among relatives. According to Trocaire, OXFAM and CONCERN (2014:1) more than 17 different actors intervening in land dispute resolution in northern Uganda prefer to use Alternative Dispute Resolution (ADR) approaches such as neutral evaluation, mediation, arbitration/conciliation, crime stopping and referral but cases of bad faith land grabbing “exceed both the capacity and mandate of non-binding ADR”. Because mediation and other conventional ADR approaches were found to lead to unjust outcomes

of land loss “for the sake of peace”, they recommend the use of “appropriate ADR” which involves use of rule of law and conciliation to combat bad faith land grabbing, and should not focus on mere resolution of cases but rather on the holistic rebuilding of orderly communities.

According to Burke and Hodges (2017) the safeguards enshrined in laws and policies that encourage responsible investments in agriculture have not prevented land dispossession because of the weaknesses in the land administration systems. Because of this, different enterprises found alternative ways of ensuring due diligence through working with informal networks such as identifying an influential community member to liaise with community members, local government, agro-input suppliers and buyers.

The situation of community-investor land conflicts has also not been ably addressed by local governments as a review of literature on districts where investments are currently rampant shows that it is only Nwoya district in Acholi region that has developed strategies for mitigating these challenges as reported by Burke and Hodges (2017:22). They note that that the district local government has developed strategies of promoting investment including; 1) “Guideline for land acquisition; 2) Investor Guide: Standard Operating Procedures comprising a set of procedures to guide investors on the process of establishing agricultural enterprise including cultivation, value addition and/or processing within Nwoya District; and 3) a Local Economy Business Assessment Report”.

Research Problem and Justification

Uganda, like many other countries in Africa is characterized by a combination of weak national legislation governing land and environmental protection, as well as pro-investment policies that undermine local communities’ land rights. National laws, policies and practices in the country have led to the rise of community-investor-state conflicts in many regions of Uganda. Meanwhile, the voluntary nature and lack of national adherence to international laws and principles of responsible investment – including the use of international laws to address the negative social and environmental impacts of land-based investments—are limited.

Currently, predominant approaches to investment-related rights violations in the field of land and environmental justice in Uganda are reactive, rather than preventive. Legal empowerment is usually provided after communities have been impacted, displaced, or evicted, and often after lives have been lost, property destroyed, local waters and soils polluted, and communities devastated. In such cases, reactive legal empowerment has a limited chance of restoring the damage caused. It is on this basis that the proposed research project sought to investigate, implement, and disseminate preventive legal empowerment and conflict resolution as a tool to prevent damage and loss of land related to badly done land-based investments.

Methodology

Approach: The project relied on an “action-research” methodology both to create concrete impacts in the project sites and to collect, analyze, and disseminate data and insights to feed into national and international policy processes relating to investments. Action research is a solution-oriented research approach involving researching, developing, testing, evaluating, and upscaling approaches for addressing concrete problems. The action research was guided by the following questions.

1. In the context of increased pressures on land and resources in rural Africa, how do we

shift from responding post-facto to investment-based conflict and harm to anticipating and preventing conflict and harm before it occurs?

2. How can legal empowerment approaches help prevent—rather than merely remedy—rights violations in the context of large-scale land-based investments, addressing root causes rather than symptoms and increasing accountability in systemic terms?
3. What approaches are needed for legal empowerment to be inclusive and sensitive to social differentiation (women, indigenous groups, youth, refugees and internally displaced populations), taking an approach that recognizes intersectionality and pursues to ensure that women, youth, and members of marginalized groups make their voices heard and act as leaders within their communities?
4. How can legal empowerment approaches be designed not only to address the immediate needs of local communities but also maximize scope for upscaling and integrating lessons learned into national policy reform in Uganda?
5. How can action related to land/natural resources rights be harnessed to support democratic, inclusive dialogue within affected communities, with the purpose of developing collective actions and initiating discussions with local/national governments and the private sector?
6. How can legal empowerment approaches create space for participation of all stakeholders and contribute to empowerment of communities to decide what happens to their land in the context of land-based investments?

User participation: The study employed a participatory action-research approach to ensure that community members led the processes of reflection, deliberation, and action within the project. The user participation approach recognized the value of end-users (target beneficiaries – direct 3,673, Females-1,628, Males – 2,045; Indirect- 117,669,715) as co-creators of knowledge and solutions generating 48 cases of community-investor violations and over 1,000 individual grievances. This participatory lens was evident through the following key elements:

- 1. Inclusive Stakeholder Engagement:** The study prioritized the active involvement of various stakeholders—particularly the marginalized women and youth populations—throughout the research process. This was achieved through participatory action research data collection methods, such as 24 focus group discussions (FGDs) , 62 key informant interviews (KIIs) , 66 collective community meetings ,13 multi-stakeholder dialogues/ mapping and 9 district inception meetings. These forums allowed participants to express their lived experiences, challenges, and ideas directly shaping the problem and the development of solutions. For example during a particular community-level data collection meeting, the research team made a deliberate decision to separate women and men into different discussion groups. This inclusive approach was utilized in order to create a safe and comfortable environment where women could freely share their opinions and experiences. The separation was especially important in situations where women felt intimidated or reluctant to speak freely in the presence of men—particularly elders, their husbands, or other male relatives. By facilitating gender-specific spaces, the research ensured that women's voices were heard without fear of judgment, hierarchy, and social pressure.

2. Co-design and Co-creation Practices: The study sought for co-creation of solutions with users rather than for users. Through tools like participatory mapping of community-investor conflicts, the communities were engaged in identifying potential conflict threats and then supported LEMU in generating, evaluating, and refining ideas or solutions to the grievances. This not only built local ownership but also ensured that the proposed interventions were contextually relevant, culturally sensitive, and practically feasible.

For example: In the case of Awer forest reserve versus the community in Okwongdul sub-county, in Dokolo district, LEMU as in the initial project design thought to work with paralegals to have community grievances resolved, however, through engagements with the community, suggestions were made to instead create and work with grievance redress committees composed of community leaders (traditional leaders, local government leaders, the police, religious leaders). This turned out to be an effective legal empowerment approach and by the close of the project, 93% of the grievances in that community had been resolved by the grievance redress committees.

3. Use of Interactive Feedback Mechanisms: The study also incorporated feedback mechanisms, where community insights collected in earlier phases of the project informed continuous refinements in later stages. This looped interaction with project beneficiaries ensured that the solutions remained dynamic and grounded in evolving local realities. For example in the case of the community of Pakiri village and a Japanese road construction company, LEMU had initially received misleading information during the first year of project implementation, indicating that there were serious internal conflicts within the community. Acting on this information, LEMU contracted a legal expert to support conflict resolution and assist the community in drafting resource management rules or by-laws. However, as the project progressed, community members reported that the legal personnel deployed by LEMU was acting contrary to their interests—pursuing a personal agenda rather than aligning with the community's priorities. Furthermore, it emerged that the core issue was not a broad-based community conflict as initially believed, but rather an identity dispute between two descendant families within the same clan. The community also clarified that there was no direct conflict with the investor. In response to these revelations, LEMU immediately terminated the engagement of the legal assistant so as to rebuild trust and restore harmony in the community. LEMU convened a follow-up community feedback meeting reaffirming its commitment to a participatory approach by shifting decision-making power back to the local people, allowing them to take full ownership of the change process.

4. Legal Empowerment through Capacity Building: The study conducted interactive capacity-building during project inception meetings, regional-level multi-stakeholder dialogues for duty bearers and learning exchanges for the project staff. The regional stakeholder dialogues held in Teso and Karamoja sub-regions not only enabled leaders to participate in data collection but also in analysis and interpretation. This increased the local capacity to own and sustain interventions, creating a feedback-rich environment that values community knowledge and promotes agency. The project learning exchanges to Kenya and Cameroon equipped staff with best practices to drive change through benchmarking and upscaling successful solutions in those countries back in Uganda.

Data Collection

The study was initially designed to collect data using three data collection activity tools, which included

- 1) Rapid Response Mechanisms and Early Warning Hotlines—these systems included a free hotline number supported by a mobile network and widely publicized through posters, local radio programs, flyers, billboards, and community meetings. A network of key informants on the ground provided timely and credible information about potential rights violations through the hotlines. LEMU staff managed incoming calls and reports from informants, all of which were documented in a simple database. Where necessary, field visits were conducted, with support from paralegals, pro bono lawyers, and trusted government officials to ensure effective legal intervention.

Deviations: Within the first (6) months of the project implementation, only twelve (12) cases of community-investor rights violations were reported from the hotlines; that is, 3 cases were from Karamoja, 6 from Teso, 3 from Lango and non from Acholi sub-region. This was divergent from our prior anticipation that we would receive large volumes of calls from the local populations. With this realization, the study had to change or shift strategy from relying on the rapid response systems and hotlines to other empirical methods of collecting data on investment pressures. To improve the response from local communities, the study opted to rely more on radio talk shows, hotspot mapping, district-level project inception meetings, a network of informants and LEMU staff guided by the following seven data collection tools.

- i. **Tool 1:** Case intake form (filled in when a case is reported)
- ii. **Tool II:** Case tracking/mediation form (filled in on a quarterly basis until a case is closed)
- iii. **Tool III:** Case follow up/impact form (filled in after all preventive legal empowerment approaches had been employed on a particular case in a given community)
- iv. **Tool IV:** Participatory Monitoring of Investor Compliance (administered to investors)
- v. **Tool V:** Key Informant Interview Checklist (administered to target groups like land institutions, land rights defenders, individuals knowledgeable on cases followed)
- vi. **Tool VI:** Focus Group Discussion Guide (administered to target groups like women, youth, elders, affected households)
- vii. **Tool VII:** Regional Conflict Hot Spot Mapping (administered through phone or physical interviews conducted bi-annually)

Using this approach to data collection, the study was able to register forty-eight (48) new cases of community-investor violations in the second six (6) months of the project implementation period, with the majority (63.2%) of the cases registered from the Acholi sub-region, followed by Teso (19.3%), Karamoja (14%), and Lango (0.5%), respectively. This information was gathered from 9 district inception meetings, 12 community meetings, 5 radio talk shows, 11 focus group discussions, 25 key informant interviews, and more cases were reported in subsequent project activities and period.

- 2) **Mapping Conflict Hotspots**— the mapping tool was developed to help community members and grassroots actors identify areas at risk of land- and resource-related conflicts and to guide preventative conflict resolution and legal empowerment efforts. It was based on three key assumptions: that conflict was more likely in areas the state considered “idle” or “abundant” and targeted for business use; that regions with discovered mineral resources experienced increased investor-community tensions due to land speculation by elites and acquisitions by investors; and that land or resource scarcity, especially in areas where communities heavily relied on land for subsistence, significantly increased the risk of conflict. Discovery and presence of minerals in our areas of study was a major driver of conflicts and turning those areas into conflict hotspots.
- 3) **Participatory monitoring of investor compliance**—this tool was designed to help communities identify and understand investors’/companies’ legal and contractual obligations, enabling them to monitor compliance over time and take action when necessary. It employed participatory action research methods to encourage community-led reflection and response. It was closely linked to the Rapid Response Mechanism (RRM) for additional support in specific disputes. The tool also integrated with the hotspot mapping system, especially in cases involving boundary or land encroachment issues. Insights and analysis generated through this process facilitated constructive dialogue between communities and investors, helped to address compliance concerns and improve accountability.

Deviation: With an exception of a few investors—such as Bukoona Agro-processing Industry in Nwoya District and forestry investors in the Awer Forest Reserve in Dokolo District—who were receptive to compliance monitoring, most investment projects were unwilling to engage in the participatory monitoring process. While the quality of data was somewhat affected by the refusal of certain companies, like Ever Grande (gold mining in Lokales, Amudat District) and Tororo Cement (limestone mining in Tapac, Moroto District), to participate, the research team was still able to collect valuable data. This was made possible through the active involvement of affected community members and local leaders, whose input significantly contributed to the investor compliance data collection tool.

Research Findings

Over the past three (3) years, LEMU’s action research project, Preventive Legal Empowerment: Early Alert and Action to Strengthen Rights in the Context of Land-Based Investments, explored innovative approaches to legal empowerment in communities affected by land-based investments. Focusing on four critical sectors—mining, forestry, agriculture and agro-processing, and tourism and hospitality—our work aimed to identify early risks to rights and proactively strengthen community protections and responses before disputes and violations could escalate. Through field-based preventive activities, LEMU gathered valuable insights into how communities can be better equipped to engage with investment processes, assert their rights, and collaborate with stakeholders in a constructive manner. The findings of this research shaped the development of targeted policy briefs designed to inform and influence key government decisions and actions of sector actors. By disseminating practical strategies for preventive legal empowerment, the project aspires to embed early warning systems and rights-based safeguards into future land-based investment practices. Below is a presentation of the findings from the three (3) years action research project.

1. Communities divided between those pro and against the investment. The research findings from Acholi, Karamoja, Teso and Lango all showed that land-based investments contributed to fracturing community solidarity. Dividing communities into those that supported the investment because they derived some benefits; and those that opposed because they perceived rights violation or the cost of foregoing their rights was not matched with the offer from investors. This division was manifested and further entrenched into how conflicts related to the investment were managed or resolved. In one case study for example the Resident District Commissioner, District Chairpersons, and Area Councilors on one side/team supporting the investment versus a few pro-people leaders and powerless community members who questioned the benefits from the investment. This not only fueled conflicts but also increased the avenues of furthering harm, damage and loss by investors.



***Example 1:** In Acholi sub-region, Nwoya district, Koch Goma sub-county in Lapem village, a green energy company, “Bukoona Agro-processing Industry,” investing in clean cooking energy through the production of bio-ethanol fuel from the chemical fermentation and distillation of cassava and assembling clean cooking stoves, was accused by local people of employing workers from outside the region and exercising preferential treatments to people outside their region or community. Respondents in a focus group discussion reported that Indian workers in the factory were paid higher salaries for the same work done and given contracts whereas the local “Acholi” people were given non-contractual meagre wages. Community members also openly reported that they lost hope in reporting their issues to the local leaders stating that all the district leaders were compromised by the investors through cash and fuel handouts.*

***Example 2:** In Tapac sub-county, Moroto district, a pro-community parish councilor who openly opposed the investors’ unjust initiatives for example, the distribution of food (posho) handouts to community members, the luxury treatment of a few community leaders who were included on the company’s payroll and taken to Mombasa for a tour to comprise them and the forceful eviction of people to create space for a cement factory was mysteriously found dead in a shrub. According to community members his death was attributed to some pro-investor local leaders.*

2. Limited local efforts/mobilization and agency to manage disputes from land-based investments. Most of communities that participated in the study exhibited powerlessness to mobilize themselves to deal with land-based investment related disputes or grievances. The communities greatly depended on outside/external actors especially civil society organizations for facilitation and to organize them to demand for their rights. The local leaders equally expected facilitation and NGOs organizing them so that they can perform their mandates. During several community meetings held in the Acholi, Karamoja, Teso, and Lango sub-regions, most community members, local leaders, and paralegals reported that they had not taken independent steps to initiate community organizing efforts in the absence of LEMU or other development partners—even when such efforts required no financial resources. This kind of mindset of depending on external support to resolve local disputes is not sustainable. To create lasting and meaningful change, it is crucial for local communities to take ownership of these initiatives and actively participate in developing solutions—even when external support is unavailable. Empowering communities to lead their own development processes not only fosters sustainability but also strengthens their ability to advocate for their rights and negotiate fairly with external stakeholders.

3. The geographical and grievance ripple effect of investment violations: The study further revealed that investment violations, when handled improperly or without due regard for community rights, can lead to severe and far-reaching consequences. These negative impacts are not confined to the immediate area where the investment is situated; instead, they often ripple outward, affecting surrounding regions both geographically and socially. Such violations can trigger a cascade of grievances, sparking conflicts over land, displacement, food insecurity, loss of livelihoods, environmental degradation, and even inter-community tensions. In extreme cases, the resulting harm has been described as barbaric and inhumane—particularly when communities are left voiceless and justice is delayed or denied.

Experience from the field: The launch of the government backed Bukoona Agro-Processing Factory in Nwoya district and the Acholibur Parish Project (APP) in Northern Uganda came with grand assurances of economic transformation through cassava commercialization. Encouraged by these promises, farmers across multiple districts—including Nwoya, Pader, Gulu, Agago, Kitgum, Amuru, and Lira—committed significant portions of their land to cassava cultivation. This expansion was further facilitated by the distribution of cassava cuttings through the National Agricultural Advisory Services (NAADS) under Operation Wealth Creation (OWC), a program overseen by the President's brother. In 2017, Gulu Archdiocese initiated a farmers' association in Acholibur, Pader District, enrolling over 5,000 members to cultivate more than 10,000 acres of cassava. The following year, the Government of Uganda, through NAADS, formalized its commitment by signing a memorandum of understanding with Gulu Archdiocese and eight district local governments to promote cassava commercialization in northern Uganda. However, despite these efforts, the anticipated economic benefits did not materialize.

In an interview with the Daily Monitor, Mr. Ventorino Okumu, the Cassava Commercialization Project (CCP) officer at Gulu Archdiocese, acknowledged the challenges farmers faced, stating: "There is no market for fresh cassava; we are still lobbying for a cassava dryer machine to help our farmers because we have a market for dried cassava at Bukoona factory. We want our people to get out of poverty." However, even after securing markets for dried cassava, the Bukoona factory ultimately failed to purchase the produce. As a result, rather than alleviating poverty, the initiative exacerbated economic hardship. Farmers who had dedicated their resources and land to cassava production found themselves stranded with unsold crops, deepening financial distress and food insecurity across the northern districts. This failure underscores the risks of poorly coordinated agricultural commercialization projects, where policy-level commitments do not translate into sustainable market opportunities, leaving local farmers vulnerable to economic instability.

4. The critical role of institutions that govern land and investments. The study found that the success, failure, or degree of social acceptance or resistance to land-based investments in Uganda is closely influenced by the quality, competence, and integrity of the country's political and economic institutions. Strong, transparent institutions have the capacity to guide investment processes in ways that are equitable and just, while weak or compromised institutions can further exploitation, repression, and conflict. Institutions play a critical role in the de-escalation or escalation of grievances, disputes or conflicts between communities and investors. The study found most investors who obtained their licenses from central government ministries and agencies undermined the local government leadership structures which disempowers them. When institutions fail to uphold their mandates—whether due to political interference, corruption, or limited capacity—they create space for investors to abuse people's rights. The conduct of investors, therefore, is not merely a reflection of individual ethics but often a response to how well or poorly state systems, structures and institutions enforce laws, protect rights, and mediate disputes.

The following case examples illustrate both the successes and failures that emerged from the interaction between LEMU and state institutions, highlighting how these relationships either helped to de-escalate or, conversely, intensified grievances between communities and investors.

Case 1: Since 2006, communities next to the Awer forest reserve in Dokolo district, Lango sub-region, had raised more than 50 grievances against a private investor who had planted a forest without addressing local concerns/grievances. The situation remained tense for years, marked by community frustration and neglect by both the investor and the National Forestry Authority (NFA). However, a transformative shift occurred through the introduction of preventive legal empowerment approaches advanced by this study. LEMU facilitated dialogues between communities, local leaders, and relevant authorities and helped to bring long-suppressed grievances into the open. In a significant show of institutional strength and solidarity, Dokolo local district leadership—including political figures, civil servants, and law enforcement agencies (the police)—stood firmly behind the community during these engagements. As a result of this collective action, the district leadership exerted pressure on NFA to respond substantively to community demands, which included

- *The demarcation of forest boundaries to prevent further encroachment onto community land.*
- *Compensation for community members whose land had been previously taken.*
- *The removal of family graves from forested areas.*
- *The allocation of 5% of the forest land to local communities for community forestry and agriculture, in line with legal provisions.*
- *The cessation of illegal arrests and the unlawful impounding and sale of cattle by the investor.*

NFA consented to all the demands made by the community and the district leadership, and the disputes in the community were all resolved. This coordinated response not only restored community rights but also rebalanced power dynamics, resulting in what has been described as a “real collective power” of the community. In a notable shift, the investor himself acknowledged the value of LEMU’s role during a community visit which was part of a global learning exchange held in June 2024, crediting the organization for helping resolve the long-standing conflicts. This case illustrates how robust collaboration with strong institutions can lead to sustainable investment good practices in local communities.

Case 2: In Amudat district, in Cheptokol and Chepkarat villages, a Mining Company, which mines gold repeatedly ignored community outcries relating to poor payments, encroaching on community gold mining pits, pollution of communal water sources with mercury, and uncontrolled underneath digging of gold routes passing under people’s homes. Since 2022, LEMU has been working to collaborate with the investor, succeeding only once, when the investor made a long list of promises relating to corporate social responsibility including: building a community school, extending water to the community, and building a health center. However the investor fulfilled none! LEMU convened and built the capacity of district leaders during various community meetings and regional stakeholder workshops, but all these efforts have been obliterated by the investor through bribes and gifts to the same leaders. In different community meetings, the community members reported that the most of the district top leadership were on the investor’s payroll.

This case highlights how the failure—or outright capture—of local political leadership can enable investors to operate with impunity. When self-interested political figures prioritize personal gain over community welfare, they effectively grant investors opportunities to violate community rights. Without institutional checks and accountability, such scenarios erode trust, entrench exploitation, and block any meaningful resolution of community grievances.

5. Corruption fueling community land rights violation in the face of investment. The study found out that corruption played a big role in how land-based investments were managed but also the level of involvement of leaders and duty bearers in the handling of investment related disputes/conflicts. Local sub-county leaders would request for over-quoted fuel covers to attend project meetings at the nearby village; district officials would request for a sizable amount of “facilitation” for themselves and their teams (security guards and the drivers) to attend meetings; top national duty bearers would intentionally miss high-level project engagements if not advanced big allowances; the list goes on. Monetization of service delivery by most national, local, district and sub-county duty bearers has largely contributed to the deprivation of community land rights during land-based investment. These were reported by communities to have received bribes in order to incline towards the interests of the investors vis-a-vis the community. Some duty bearers have to be bribed to perform their mandates without which they disregarded calls to address community-investor conflicts.

***A case out of many:** In Amudat district, where LEMU was working to protect customary land tenure rights of the community from an investor who forcefully dug deep gold mining pits across and beneath people’s homes, coupled with other gross human rights and labor issues. LEMU always worked with local sub-county and district leaders as entry points in the community and necessary for holding successful community meetings. In almost all engagements, the local leaders always demanded to know how much compensation was available or even demanded to be advanced the funds prior to coming for the meeting, and in a few instances, LEMU would advance the “facilitation,” and the leaders would not even turn up for the agreed engagements.*

6. Investments undermining communitarian and traditional identity either at the family, community, or clan level. This study discovered that land-based investments have contributed to diluting community centrism, shared values and subverted social relationships and cultural preservations, therefore creating flames of confusion especially for the youth and women as the dominant portion of Uganda’s population. Investments have greatly weakened the role of cultural and traditional leaders in society and compromised their position regarding social and cultural taboos like selling of land. Investments present opportunities to the youth to earn incomes either through the sale of land to the investors or provision of labor; the choice depends on what’s more rewarding or the availability of options. The result of this is conflicts between the elders, who are entrusted to uphold social and cultural beliefs, and the youth and their accomplices (sometimes community leaders).

***Experience from the field:** A few community leaders teamed up with the youth of one family in Amuru town council, Amuru district to sell off a community cultural center (hot spring) to a member of parliament without the consent of the clan or chiefdom of Pagaak which in the Ker Kwaro Acholi (the cultural institution of Acholi) was responsible for governing the same land since time immemorial. The resistance to the sale by the clan resulted in protracted conflicts between the clan and the youth who sold off the land, leading to the arrest of over 100 members of the community, the chief of the Pagaak clan (Rwot) also lost his royal regalia (a walking stick) and was badly injured during the scuffle and was later hospitalized. What started as a land transaction transformed into an extended conflict drawing in social, economic, and political concerns in the community. In Karamoja sub-region, community elders often lamented how investors in the communities, occupy land and evict people without consultation with the area elders or clan heads; the practice was not different in the Teso and Lango sub-regions.*

7. The individualization of natural/common resources:

There is a growing practice of private individuals and enterprises controlling the access and use of natural and common resources for their personal benefit at the expense of the entire community. Private agricultural investors enclosing and gatekeeping communal wetlands, hot springs, forests, and wells. For example, an investor in Kapujan village in Katakwi district decided to fence off and exclude hundreds of community members from the use of a community valley dam built by the local government. This generated serious conflicts within the community because people did not have alternative sources of water for their animals. The matter was only resolved after LEMU's intervention under this project. In another community in Kigoli cell in Amuru Town Council (Acholi region), a former Member of Parliament decided to use force to build a tourist resort around a community hot spring, claiming it as his personal property. For generations, the community had used the hot springs to perform cultural rituals but the fencing of the hot spring had stopped them, resulting in conflicts that made them destroy part of the establishments at the tourist resort and render the site redundant.



8. The role of security organs in land-based investments.

There was a huge presence of security organs that manned, guarded and protected investments even when communities still contested land allocations to those investments. This was witnessed in regions that were endowed with minerals and large tracts of fertile land notably Karamoja and Acholi sub-regions respectively. In Karamoja (Tapac, Rupa, Lokales sub-counties) the army/soldiers guarded such investments and communities were denied access to previously communal grazing lands, community access roads to grazing lands were closed off. Not only did these

actions create a lot of fear and anger within the communities, but also escalated conflicts between communities and investors. The land-based investment followed during the study showed that the police and the army as they enforced the law, they were more responsive to the needs of the investors than those of the communities. This contributed to lack of accountability for human rights abuses or environmental damage caused by investment projects.

9. The evolution of questionable solutions:

This is a growing trend in Uganda's investment space, with business ventures purporting to provide solutions to environmental damage and climate change yet actually contributing to the destruction of the environment. These investments tend to mask environmental problems by temporarily alleviating symptoms or shifting damages elsewhere; they

prioritize economic and political interests over climate and social justice. Most of these investments have mastered ways of rallying political support from top national institutions, Politically Exposed People (PEP) and even the president with highlighted promises of change. The questionable solutions have also contributed to deep-rooted social, political, and economic problems in local communities exacerbating the already worse conditions of vulnerable people in society.

Experience from the field: Bukoona Agro-processing industry in Nwoya district, Koch Goma sub-county started operating in 2019 with a promise of distilling ethanol as a clean cooking biofuel from dried cassava and maize to replace the use of charcoal so as to combat deforestation and mitigate climate change. The factory in Nwoya district was officially opened and launched by the president of Uganda. Bukoona promised and convinced nearby local communities of the Acholi sub-region to grow cassava to meet the demand for the raw material and also marketed this green energy solution as cheaper compared to the use of charcoal for cooking. Besides a number of reported labor grievances between the company and the community members, the factory failed to uptake cassava from the local community, yet they had already allocated substantial portions of their land to the cultivation of cassava. This caused discontentment among local farmers causing food insecurity in the community and poverty given the absence of the projected incomes from the would-be sale of cassava. The study discovered that the company told lies in its marketing for the solution as a cheaper option; the pricing of its clean energy cooking stoves and biofuel (ethanol) is expensive compared to the purchasing power of most local communities. A double-burner cooking stove sells at a subsidized price (for residents within Nwoya district) at Uganda shillings 295,000, a single burner stove sells at 195,000, and a three-liter jerry can of the biofuel at 13,000 usable for up to three days. Most local communities will logically have to weigh the opportunity cost of using firewood or charcoal against the buying of this clean cooking equipment in the presence of other domestic needs like health, business and education. The failure of the company to; source cassava from local communities so as to improve their livelihoods, regulate the high prices for the equipment that will eventually perpetuate the use of charcoal and deforestation, the acute environmental pollution from the disposal of ethanol-smelling wastes into a community river (River Ayago) and the bad stench from processes of distillation and all the labor problems reported by the community. These qualify the Bukoona Agro-processing industry as a questionable solution divergent from what is marketed in the public domain; their operation only creates a loss for the local population and a win for the industry.

See Image below:

Frame 1: The picture shows a marketing chart of the social impacts of Bukoona Agro Processing Industry's green energy solution as energy saving, less carbon emissions, cheaper as compared to liquid petroleum gas and charcoal, empowering of cassava farmers, environmentally friendly, enriching through employment, and easier to operate.

Frame 2: A picture of Bukoona Agro-processing worker who lost all his left fingers while operating a boiler at the factory. This gentleman reported that he was not granted workers' compensation for the damage, nor was he clad in protective gear during the accident.

Frame 3: A picture of dead fish in River Ayago as a result of hazardous dumping of industrial waste products in the river.

Frame 4: A picture of an award of honor from the government of Uganda to Bukoona as the best visionary renewable energy supporting company of the year in 2024



10. Poverty aiding land dispossession in communities. Most of the natural resources and valuable minerals are found in the poorest regions of the country, for example, the northern and north-eastern parts of Uganda. While poverty has contributed to communities' limitations to control or exploit their land-based resources, the powerful (the rich, multinational corporations, state etc.) have taken advantage to exploit and dispossess poor



and vulnerable communities of their land and their right to enjoy their natural resources. It is important to note that dispossession does not end with land, but extends to; food and social desperation. In one case in Moroto district (Tapac sub-sub county), an investor who had taken vast land, was exploiting labor and limestone was seen as a “savior” by the poor community members that always went for weeks without food, because the investor always brought posho for people, after several laborers were reported to have died of hunger. While conducting a community dialogue where land rights were being discussed a truck of posho (maize flour) approached the meeting area, community members disregarded the meeting and run to the truck to receive food handouts.

***Experience from the field:** In Tapac sub-county in Moroto district, coincidentally the day the research team conducted a community meeting was the day the investor (Tororo cement) had planned to give food handouts to the community. While the research team aimed at discussing the implication of the investment on the land rights of the community, issues of land ceased to be important as the community preferred to stop the meeting so that they could receive their food rations. The action of the community preferring food handouts to attending a community meeting to understand their land rights was a desperate survival tactic that cannot be judged because of the chronic famine faced in Karamoja sub-region. To demonstrate the level of poverty, desperation, and hunger faced by the same community that provides labour in the extraction of limestone for Tororo cement, a leader told the researchers that “if the meeting delays, someone will just drop dead due to hunger”. The handouts were distributed in a dehumanizing way, including beating those that lined up to receive food because they had failed to control or “behave” themselves. How can a community that has received food handouts be in a position to challenge land rights violations from an investor? In Acholi sub-region one investor who happens to be a member of parliament (MP) bought acres of land for investment in Namukora sub-county, Kitgum district at just UGX 200,000 an acre which is less than 60 USD.*

11. The multifaceted impacts of land-based investments. The immediate effect of land-based investment is the violation of or contestation over community land rights however as the investments are implemented, they breed a cocktail of other grievances and negative effects. These include; economic marginalization, social injustices, human rights abuses, labour rights violations, environmental degradation and gender-based inequalities. The dilemma lies in the fact that investments were not selective in which category of grievance to front or hold; however, NGO's like LEMU and others were always trapped in a pool of choices in relation to what problems to respond to and what to ignore. LEMU for example had to make decisions to either exclusively focus more on protection or preservation of land rights or to choose to ignore all other grievances (human rights, labour issues, environmental damages, chronic hunger) that often intersect with land rights abuses. In most scenarios, the priorities of LEMU did not align with those of the local communities, creating a further complex situation given the demands of the donors or other stakeholders involved in the interventions. This has and will continue hindering civil society work, as different actors are working on different issues but have, over time, failed to join efforts and form a united front against local community grievances

12. NGOs and government leaders profiteering from investor-community conflicts

(protectors and grabbers): In some cases, investor-community conflicts were escalated by representatives from NGO's and government who disguised themselves as community champions yet harboured selfish interests. In Lokales sub-county, Amudat district, the community asserted that an NGO staff organized local community miners into a communal artisanal miners association (Okusolota mining association) which later received surface rights compensation from a mining company amounting to Uganda shillings 500,000,000 (five hundred million shillings) which was received from Mbale town by the NGO representative in the region. However, artisanal miners reported that it was only a few leaders who tasted the money, and the organisation never appeared again in the community leaving many people landless since they had already surrendered their mining spaces to the investor. In Tapac sub-county, Moroto district, during the establishment of a new mining lease for Tororo Cement, an NGO (name withheld) took the lead in documenting the list of land rights owners to be compensated. However, upon examination, it became apparent that politicians, NGO and church representatives, who claim to champion land rights protection, were included in the list as landowners and positioned more as beneficiaries of compensation meant for the community. Many leaders from Moroto district local government, Tapac sub-county local government, as well as NGO leaders and the Catholic Church priest in Moroto district were included in the list as beneficiaries and represented the community on the negotiation committee with the investor. This situation raises questions about whether these leaders are genuinely advocating for the rights of the people or they are using their position to access benefits meant for the local community members.

13. Investments ride on intra-community conflicts deeply rooted in family and clan divisions to exploit communities. In the Acholi region (unlike other areas where investment disputes typically involve the community versus the investor), conflicts existed within the communities, marked by tensions among clans and families. For instance, in Pakiri village, Amuru district, two families had been in conflict over land rights for a long time, with accusations of one family being mere "in-laws." A Japanese road construction company capitalized on this situation of intra-family conflict over a natural resource and purchased a community rock from one side of the family at a low price, favoring one family over the other, regarded as mere "in-laws." When the same investor sought to buy another community rock, community members, feeling cheated in the first sale, requested LEMU's intervention in preparing the community for the sale. LEMU conducted multiple community meetings to empower and organize the community for fair negotiations, considering human and environmental impacts. However, family divisions impeded LEMU's efforts creating tension during meetings with threats of non-cooperation among family members. Family disputes also led to conflict resolution objections during crucial stages, such as mapping the community rock and producing an ESIA for the community rock. Internal differences within communities pose a risk, as investors may exploit these divisions by dealing with a few individuals and excluding the majority. Despite challenges, some community members appreciated LEMU's conflict resolution efforts in Pakiri village, acknowledging the organization for restoring unity among the families and fostering reunions between estranged relatives. In one of the community meetings, a man expressed gratitude to LEMU, acknowledging that he had been away from home for an extended period and not until LEMU initiated conflict resolution and family reconciliation meetings did he feel safe to step back home.

14. Government-CSO-Community collaboration is a critical preventive legal empowerment approach. CSOs help to create space for dialogue but also to reduce the gap between the state/government and communities as they address or manage disputes and

conflicts related to land-based investments. For example, LEMU's efforts were very impactful where the local government leaders at district, sub-county, parish and village levels agreed to collaborate with the organization to address the grievances raised by the communities against investors. This collaboration with local government leaders contributed to filling the leadership vacuum that had existed in these communities prior to the implementation of this project. It also helped to put pressure on the investors to respond and address community grievances because the local government leaders started connecting with other government agencies to threaten cancellation of investment licenses in cases where they acted in defiance of the local government leaders and community grievances.

Experience from the field: This for example was witnessed in communities like Awer Forest Reserve in Dokolo district where more than 50 grievances existed and the investor had been ignoring since 2006 when he platted the forest but preventive legal empowerment approaches such as community and leaders' dialogues exposed the grievances of the communities against the investor and National Forestry Authority (NFA). The district leadership (political leaders, civil servants, law enforcement) all came together to back LEMU up during all community meetings where communities articulated their grievances against the investor and their demands for redress. As a result, the district put pressure on NFA to demarcate the boundaries of the land and compensate those on whose land the forest had encroached, to remove the graves of families buried in the forest, to give 5% of the land to community members for community forestry has stated in the law, it put an end to all the illegal arrests the investor had been inflicting on the community members whenever their cattle trespassed into the forest and illegal sale and detention of the cattle without the permission of the owners. This process in Dokolo has resulted in a real collective power of the community against the investor. During the global learning exchange visit held in the community in June 2024, the investor testified that he had now come to appreciate the contribution of LEMU in overcoming the conflict between him and the community members. This GOV-CSO collaboration is an approach that LEMU is scaling up for adoption by CSOs and local governments in other locations, but also disseminating internationally, as was done by hosting the global learning week in one of the project communities in June 2024.



Image 3: An aerial view of Awer forest reserve in Dokolo district. This picture was taken during the global learning week on government-civil society collaboration that was organized by National Land Coalition Uganda in 2024 with participants coming from over 30 countries.

15. Prevalence of limited knowledge on land rights by local communities. Most of the investment cases that were followed in this action research took place on communal and family customary land. It is therefore legitimate customary land rights holders that are affected the most by investment projects. Majority of people do not know how to or are not empowered to demand for their rights in the face of violations by investments. This can be attributed to low levels of education, high levels of poverty, and the fact that in the recent past people's tenure security on customary land was more certain, and there was no need to prove ownership of land. In Tapac sub-county where limestone mining was taking place community members did not know about their rights to compensation for land surface rights before excavation of rocks could begin but rather were more concerned with providing labour in the extraction process as a means to overcome their condition of poverty and extreme famine.



Image 4: A picture of local artisanal miners (men, women and children) excavating limestones in Tapac sub-county, Amudat district to be sold to Tororo cement mining company

16. Communities learning from previous bad investment deals to seek preventive approaches. Although this project aimed at carrying out prevention legal empowerment interventions in communities, some of the cases registered by the project required reactive approaches, since harm had already been caused. In such cases, the project prioritized approaches that prevented further harm and rights violations from taking place. These efforts aimed to encourage communities to learn from previous experiences and avoid engaging with investors unless due diligence had been conducted to ensure that future investments would be beneficial to everyone involved.



For reference, in Pakiri village, Amuru district (Acholi region) there was a two-in-one case. The first case developed when some years back when the community sold their rock to a Japanese company at just forty million (40,000,000) Uganda shillings (about \$11,000), thinking the investor would use it for a short time but the investor has been extracting the same rock for years to carry out all its road construction projects in northern Uganda. The community realized that they had been cheated because the investor paid very little yet has exploited their resource for years and made billions from it. The community noted that the mistake came from division between those who wanted to rush for the money and those who wanted to have the negotiations strengthened. In the end, the investor excluded the resistant section of the community and paid off a small family for the rock. Another mistake arose from the fact that those who asked for compensation only looked at the rock as not having much use but did not consider the environmental destruction that would come with the extraction. Years down the road, many houses have cracked, health hazards occurred due to noise and air pollution, and community roads destroyed by the trucks that ferry the rock aggregates from the quarry. The community claimed to have learned from bad experience, so when another Chinese investor approached them for another rock, they decided to seek out LEMU to help them develop legal strategies and documents to prevent manipulation by the investor. Through LEMU's facilitation, they formed a community resource management committee to steer coordination between LEMU, paralegals, and a lawyer as they assess the value of their rock and development of sample MOU agreements and contracts to inform their negotiation with the investor.

17. Community resistance makes investment projects unproductive. In cases where the investors acted with impunity and failed or refused to cooperate with the community the investments stalled, were destroyed, or become unproductive. For example, an investor in Olio sub-county in Serere district disregarded technical advice from the district natural resources officer and community complaints, and went ahead to dig fish ponds in the middle of a community wetland, but instead sought protection from political leaders. The community retaliated by occasionally destroying the fish ponds thereby making the business venture unproductive. In a second case in Kigoli cell, Amuru town council (Acholi region), a former MP insisted on building his private tourist resort around a community hot spring. The youth in the community mobilized and destroyed the buildings, making the place unusable. In a third case in Alel village in Gulu district (Acholi region), an investor in cattle ranching did not fence his farm and always made his cattle destroy the crops of the local community. In response, the community mobilized and killed his cattle, and apart from getting some community members arrested and jailed, the investor did not get his cows back, and the farm was rendered unproductive .

This community resistance sometimes comes from the empowerment of the local community to observe and ask investors questions; for example, in Lokales sub-county in Amudat district (Karamoja region), local artisans and the general community questioned the recent expansion of a mining company into newly constructed ball-bits by local artisan miners in cheptokol village. The community tasked the company representative to find his gold through his own routes and not to follow the holes dug by local artisan miners, tapping into their indigenous knowledge of how to trace the locations of gold deposits and then later using sophisticated machinery to extract the gold. This recent community empowerment is an impact of the community awareness-raising and education meetings conducted by LEMU during project implementation. It is important to note that well as investors backed by state agencies always manage to continue their investments with impunity amidst community complaints and resistance, those without direct state backing have had their investments rendered unproductive because of community resistance. Therefore good relations between the local host community and the investor are one of the major prerequisites for the productivity and the profitability of an investment. Thus, seeking for community buy-in is very important for successful land-based investments.

18. Scanty information on investments details. There is a lot of secrecy around land-based investments which is also heightened when they are fronted or backed by the state or state agencies. The real or actual investors are hardly known; they do not provide comprehensive information to communities to ensure that all relevant stakeholders are informed about the investment. Documents are not easily accessed or understood by the community, the actual acreage and boundaries of land are not known by the communities and in some cases by investors. In investments related to mining, the type of licence (prospective, exploration, mining), the expiry period for the mining license or concessions are always not known. This not only breeds a lot of suspicion, violation of rights, but also renders communities incapable of holding investors accountable. This lack of information was observed in the community of Kapujan in Katakwi district and Guru-Guru hills in Amuru district, where the Ministry of Water and Environment was demarcating wetlands and taking over land for the establishment of a vegetable irrigation project but in both cases the community was not informed about the actual aim of the project and the long-term effect of the investment on their customary land rights. In another community called Kidi mon in Amuru district, three (3) NGOs went to the community and requested land to set up a ranch and relocate people somewhere else without revealing how they want to acquire the land, how the community will benefit, or whether the displacement of the community will be temporal or permanent. This lack of information bred suspicion and the investment has not kicked off.

19. Nomads (Balaalo) from western Uganda abusing the land rights of communities in northern Uganda with impunity and driving the local population into a situation of landlessness. In all the 5 district-level project inception workshops held in November 2022 in the Acholi sub-region, district and local leaders reported the issue of the Balaalo from Western Uganda, the Democratic Republic of Congo, and parts of Rwanda having invaded their communities with large herds of cattle in search of water and pasture for their animals. In response to these complaints, the political leaders representing the President claimed that the president had passed a directive for these groups of nomads to be evicted from northern Uganda, and they had left. Contrary to the claimt, community members in the more than 6 community meetings conducted in the Acholi sub-region reported the continued presence of the Balaalo. The community claimed that the Balaalo graze their animals on the crops of the community with impunity and are in most cases armed with guns or escorted by the

military, making it difficult for the local unarmed community members to chase them from their lands. The massive invasion by the Balaalo has therefore become a public outcry for most communities throughout the Acholi region. In a recent response to the continuous complaints from the Acholi political leaders, President Museveni issued an Executive order (No. 3 of 2023 dated 19th May 2023) ordering that because these Balaalo are “indisciplined cattle keepers,” they should be evicted from northern Uganda by the end of June 2023. If they do not want to be evicted, they should follow the right channels to buy land from local customary owners and establish cattle farms fenced off with water points within the cattle farm to prevent the animals from destroying the crops of local communities. In support of the Balaalo nomads, the president’s brother, Gen. Salim Saleh, who also works as the Senior Coordinator for Operation Wealth Creation (OWC) in the office of the president in his letter dated 26th June 2023 responded by listing to the president the “advantages” of the migration of the Balaalo group into northern Uganda. This made the president adjust the terms of his earlier order, in a new letter dated 2nd July 2023, stating that the Balaalo migrants are an “elite” group who have learnt the art of modern cattle farming and their migration would enable the growth of a strong broad-based dairy and beef industry in northern Uganda. The president therefore extended the implementation of his executive order on the expulsion of the Balaalo to September 2023, to give time to his brother Gen. Salim Saleh to “clarify the issues involved”. The implication of the President’s order and the support of the Coordinator OWC for the Acholi region and other parts of northern Uganda is that it will move the Balaalo nomads from temporal land users to permanent landowners, as they are able to use the proceeds from the sale of their cattle to buy off land from the poor community members who mainly sell land under duress since they have not had meaningful economic recovery since the end of the LRA war about a decade ago. One of the serious problems associated with the coming of investors to the Acholi region, as espoused by the leaders during the community meetings has been an increase in land sales by poor families and the rise of landlessness, driving these families into acute poverty and famine since they cannot produce their own food for sustainable livelihoods.



20. Economic-driven migration into investment communities contributing to social crisis. During several community meetings, local people complained about investors preferring to employ people from outside the community, denying them the opportunity for employment, yet its always used as bait for them to accept investments in their communities. This was mainly reported around forest reserves in Kachung and Awer in Dokolo district (Lango region) and Jelet village in Serere district (Teso region); Agro-processing plants in Koch Goma in Nwoya district (Acholi region) and Ocipi village in Lakang sub-county in Amuru district (Acholi region) where there was ongoing mechanized agriculture. Community members complained that besides denying them employment opportunities, the investment workers (who are usually supervisors) from other tribes outside the investment area usually discriminate against the local people and make it impossible for them to work with them. Community members also complained that local workers are usually paid lower amounts compared to those from outside, and expressed concerns about investment workers from outside the community contributing to moral degeneration. In areas like Koch Goma A and Eden Investments in Nwoya and Amuru districts respectively, workers from outside the community were accused of unacceptable behavior, such as pursuing married women and young girls, impregnating them, and then abandoning them. Around the forest reserves, these “foreign/outside” workers are also accused of sexually assaulting young girls while they gathered firewood and collected water. Local leaders in these investment hotspots expressed concerns that the community’s values are deteriorating, with the monetization of the economy contributing to self-destructive behaviors. For instance, in Ocipi village, where mechanized agriculture thrives, and in Koch Goma, where agro-processing is prevalent, people were engaging in excessive drinking and reckless sexual activities. This has led to increased HIV infections and higher rates of abortion. Additionally, many workers in these investments are squandering their earnings on alcohol, leaving their families in poverty and unable to build a better future.

21. There is a growing commitment to ethical investment practices by Investors. Dialogues and community empowerment to demand for their land rights have contributed to influencing some accountability and change in practice by investors. For example, a cement company in Tapac sub-county in Moroto upon expiry of its mining lease in 2023, the company actively engaged with community leaders and an NGO that facilitated the formation of Communal Land Associations in Tapac sub-county to ensure the comprehensive documentation of land rights holders in the area. This effort aimed at compensating rightful landowners before initiating a new mining lease. During mass awareness campaigns in Tapac sub-county organized by LEMU and Catholic Land Desk in November 2023, some members of the community attested to receiving compensation for the land where the investor was going to set up a cement factory in Katikekile parish. It is also during the mass awareness campaigns that a list of members on the negotiation committees, composed of members selected by the community and its leaders, was presented to the community by the Catholic Land Desk and the LEMU team for scrutiny. These committees were entrusted with spearheading compensation negotiations with Tororo Cement as part of the process to secure a new limestone mining lease. This collaboration serves as a promising indication of the investor’s willingness to actively engage with and support the local community, fostering a mutually beneficial relationship. Without a doubt, the achievement of the milestone where the investor is considering compensating the community for their land rights can be attributed to the use of preventive legal empowerment approaches employed by LEMU, like the mass awareness campaigns, radio talk shows, and regional dialogues, particularly in Karamoja region.

22. Absence of non-governmental organizations (NGOs) responding to mainstream community-investor conflicts at the community level. In almost all the community meetings and dialogues with local leaders, the welcome message for LEMU was “Thank you for coming to our rescue.” Apart from isolated cases such as the case of Koch Goma (Nwoya district), where the area member of parliament called for a meeting to address the issue of disposal of industrial waste into River Ayago, which the community depends on, and the case of Tapac community versus Tororo cement where the MP threatened to sue Tororo cement for non-compensation of surface rights in the limestone mining areas, most communities have not experienced the support of their leaders. Besides the inaction of the leaders, there are also no NGOs prioritizing the issues of investor-community conflicts in the regions of Karamoja, Teso and Acholi. LEMU suspects that this is mainly due to the fact that these land-based investment cases are highly political and therefore risky for “NGO business,” as some of them are directly backed by the state and national ruling elites. It is only in the two districts of Lango region (Dokolo and Amolatar) where GIZ funded LEMU (until September 2023) to carry out promotion of “responsible investments in land” among 17 investment cases. The absence of NGOs tackling the grievances associated with investments therefore has two implications: 1) it led to LEMU receiving a higher number of cases than it was able to deal with in the life of the project. 2) It also meant that community members are left out of the governance of their own resources on which investments are located, and in most cases, state authorities, local elites, and investors have taken over the governance and exploitation of these resources, for example, investments in the mineral sector, specifically in the case of rock extraction in Pallisa (Teso region), Pakiri (Acholi region), Tapac and gold mining in Lokales (Karamoja region).

23. Low levels of compliance by investors. This action research project designed a tool for participatory monitoring of investor compliance that focused on 1) compliance with land boundary agreements, 2) compliance with land-use agreements and compliance with promised investment benefits such as employment and infrastructural developments, 3) compliance with environmental standards, and 4) compliance with labor and safety obligations. The data showed that no investment fully adhered to the compliance checklist. Most of the promises made both oral and written in contractual agreements were hardly delivered on. Some investors refused to participate in the monitoring of their compliance, such as Ever grande for gold mining in Lokales (Amudat district) and Tororo cement for limestone mining in Tapac (Moroto district). However the research team managed to gather some data from the participation of affected community members and local leaders, and the findings are presented below.

- i) **Compliance with agreed boundaries:** Regarding compliance with agreed boundaries, it was found that investments encroached on people’s land especially forest reserves like Awer (Dokolo district) had encroached on people’s land since 2006. NFA only carried out a demarcation in 2020 and again in 2023 under this project which showed massive encroachment without compensation of the dispossessed populations over the years. Even in the case where the forest reserves appeared to be compliant with boundary agreements such as in Green Resources in Kachung (Dokolo district), neighboring communities complained that the forest tree shades denied them the ability to use their land for food production because the trees drain water from the soil. The tree shades also affected the growth of the crops, all these factors making the land “available” but unproductive. In the case of the EDICOM Company installing electric poles for rural electrification in Opuyo parish, Soroti district, there was totally no compliance with






boundary agreements, as the installation of poles was imposed on the landowners without any compensation. In the case of mining, Tororo Cement Limited was found to have extended the boundary of land marked for mining limestone beyond what was agreed to with the community. Lastly in Lokales the Ever Grande Company began exploding rocks in locations where the company had not obtained exploration licenses and also using its machines to mine in the pits dug by artisanal miners without their



- ii) **Compliance with investment lease agreements:** Just like there was non-compliance with boundary, investments were found to be non-compliant with land use agreements. For example, while NFA issues licenses to private forest developers to use NFA forest reserves to plant only forests, the investor in Awer Forest Reserve in Dokolo was found to be renting the forest land at high prices to local community members while exploiting their labor because people rent the land from the investor while planting and weeding the trees for the investor for free. Under this circumstance, the investor breached the lease agreement issued by NFA that the land should be used for forestry; instead, the investor uses the land for making short-term profits from the land in terms of land rentals.
- iii) **Low compliance with fulfilling promises of investment benefits.** Much as benefits that accrue from investments are always used as bait for persuading local communities to accept investments, the findings from this study show that investors are not always willing to enter into formal agreements on benefit-sharing with the communities. None of the 46 investments documented under this project was found to have written/formal benefit-sharing agreements with the communities. Bigger investments operating at the level of companies were found to be having some level of benefits such as; 1) constructing water sources/boreholes (Ever Grande company in Amudat and Green Resources in Dokolo districts); 2) distribution of food items during famine (Tororo cement in Moroto district), 3) scholarships for students (Ever Grandee company in Amudat district), 4) Distribution of seedlings and training community members new farming methods (Opeded in Kakakwi, Green resources in Dokolo) and 5) employing local labor to a

small extent. Although investment projects employed a small amount of local labor, there is a consistent outcry from local populations of being denied the opportunity to work. In the EDICOM Company installing electric poles in Opuyo in Soroti district, local communities said they were denied work because the company only required skilled labor yet they were not skilled in the required field of electrical engineering. In the mining sector, the local population is only employed to break the rocks as is the case of Tororo cement in Tapac while in Lokales the local population continues to operate as artisanal miners and the investor brought in Chinese to operate the machinery for mining gold. In the Forest reserves in Awer and Kachung, the local population was left out as labor is brought in from outside on the pretext that the local people are lazy and not interested in work. Where they were “employed”, the local people complained of low and non-contractual delayed payment (Green Resources in Kachung) or completely no payment (Awer forest).

Image 5: Below is a caption of the status implementation of corporate social responsibilities agreed upon by Ever Grande gold mining company in Chepkararat village, Lokales sub-county, Amudat district in Karamoja region.

Promise Made by the Investor		Status of Implementation
	Building Community Health Centre	Not Implemented
	Construction of a secondary school in Lokales sub-county	Not Implemented
	Scholarships for four school-going children at secondary education level	Implemented and On-going
	Construction of a cultural centre	Not Implemented
	Construction of community Access roads to mining sites	Implemented

iv) Compliance with labor and safety obligations. In all the investments, it was found that there is no compliance with most labor obligations because investments employ people verbally and no written contracts. Child labor was reported in forest reserves in Dokolo District and in limestone mining in Tapac for Tororo Cement. Local leaders expressed concern over rising school dropout rates, as children were being drawn into these investments in search of petty cash. The study also revealed that, due to the absence of written employment contracts, workers had no access to leave, and dismissals were undocumented and often conducted on terms favorable to the employer. In the mines, the study found completely no safety measures in most investments as people broke rocks for Tororo cement without safety gear, given the risky working environments like high-powered conveyor belts and open ball pits.

See Image 6 below.

Frame 1: A child clad in a safety helmet taking part in breaking limestone at Tororo cement mining site in Tapac sub-county, Moroto district.

Frames 2 & 3: A woman and a man employed at Bukoona Agro-processing Industries operating a maize mill without safety gear.

Frame 4: A picture of an open ball pit left uncovered after deep excavation by Ever Grande Mining Company.

Frames 5 & 6: Local artisanal miners breaking limestone without any safety gear. These pictures were taken by Alex Ssebukalu during the course of the project.



- v) **Compliance with environmental management standards.** The mining investors were found to be completely non-compliant. In July 2024, the Lokales sub-county leaders alerted the district security team that some two people had died from consuming water polluted with mercury from the mining as both the investor and artisanal miners were using mercury to clean their gold. Although Ever Grande had an Environment and Social Impact Assessment Report in place, it did not mitigate the environmental degradation resulting from the investment, such as water pollution, noise pollution from rock blasts, and land degradation from the open mining, pits that have become a trap for children and animals. In Awer Forest Reserve, the investor was notorious for spraying food crops planted within the rented forest land by the local population as long as there was disagreement between him and the local population, this contributed to loss of soil infertility and famine in the affected community. In Tapac sub-county (Moroto district) where limestone mining, took place, there was a fast rate of clearing tree cover for mining and a once green belt within the semi-arid Karamoja was turning fast into a desert-like environment.

Image 7: A picture showing the district security team in Tapac sub-county, Amudat district visiting the mercury-polluted community water source turning the water into green and unhealthy for human and animal consumption. This picture was taken by Maraka Emmanuel.

25. Some investment cases are too big for CSOs to handle.

During the course of the three yearlong action research, there was a realization that there are some land-based investment cases that cannot be handled by a single Civil Society Organization and other means or approaches have to be employed to resolve them or wittingly give up on them. These included cases where the state or security organs were heavily involved and 'historical' or old cases that had been handled by numerous different actors but had failed to get resolved. These included the cases involved in mineral extraction in Karamoja where such investments were guarded by the military and could not be accessed. Historical' or old cases of investment for example the case of marble extraction in Rupa sub-county in Moroto



district which had been going on for more than 10 years with the news of the state involvement making media headlines at the national level. In Acholi sub-region a case on Atiak Sugar factory in Amuru district was identified, it is before courts of law, another was a case of Apaa evictions both these cases have been ongoing for over 15 years. The case of government ranches and former state farms (Aswa) in Acholi, the case of Uganda Wildlife Authority (UWA) and the community in Lotisan sub-county in Moroto district where the community complained about UWA gazetted the most fertile lands for wildlife reserve and yet allocating the same land to investors. Such cases were beyond the human resource and financial capacity of this project. Interventions

on these cases were considered a high risk area for LEMU, considering the level of effort by other actors (and their failure to resolve the violation) and the high interest of the national state figures in these investment cases.

26. Right procedures for acquiring land by investors are not followed. Communities complained about seeing investors in their communities out of the blue, without prior information or communication from the authorities, investors reach the extent of showing communities what land they own instead of the reverse. There was no clear procedures demonstration of how investors acquired land, for example the influx of Balalo pastoralists in all the districts of Acholi yet the pastoralists were guarded by the military. The case of how Chinese investors who worked under Ever Grande Resources entered the gold mines in Amudat- without work permits. The study found that 96.4% of the land being claimed by investments is already in used by the local communities, refuting the common narrative that most of customary land is idle and not being put to productive use.

Insights from the Statistical Analysis of Data

The following statistical analysis presents a comprehensive evaluation of land-related conflicts and community-investor dynamics across four sub-regions in Uganda including; TESO, LANGO, KARAMOJA, and ACHOLI—under the LEMU-IDRC project spanning from 2022–2025. Drawing from both qualitative testimonies and structured quantitative indicators, this record uncovers the critical drivers of community satisfaction with preventive legal empowerment approaches, identifies the structural and relational dynamics influencing conflict escalation, and assesses the measurable impact of mediation, community engagement, and investor accountability mechanisms.

These insights are directly derived from field data captured using a suite of participatory tools meticulously designed by the project. Specifically, the data was collected through:

- Tool 1: Case Intake Form – used for initial conflict reporting,
- Tool 2: Case Tracking/Mediation Form – applied quarterly to monitor progress until case closure,
- Tool 3: Case Follow-up/Impact Form – for post-intervention assessments,
- Tool 4: Participatory Monitoring of Investor Compliance Tool – to evaluate investor adherence to agreements,
- Tool 5: Key Informant Interview Checklist – gathering insights from local authorities and stakeholders,
- Tool 6: Focus Group Discussion Guide – to contextualize collective community experiences, and
- Tool 7: Regional Conflict Hotspot Mapping Tool – used for spatial analysis and early warning.

Core areas of analysis included gender dynamics in conflict participation, the relationship between land size and conflict intensity, and the effectiveness of different legal empowerment approaches in improving community-investor relationships. These findings reflect the lived realities of affected communities and provide evidence-based guidance for conflict prevention, equitable land governance, and sustainable rural development.

Prevalence and Nature of Conflicts

- Land conflicts dominated: 88% of all conflicts were land-related, making them the most pressing issue.
- Other conflicts include:

- o Environmental: 15.4%
- o Breach of contract: 11%
- o Human rights violations: 11%
- o Labor conflicts: 6.6%
- o Border disputes: 1.1%

Conflict Status

- A striking 80% of conflicts were at the pre-conflict stage, indicating a valuable window for early/preventive legal empowerment interventions.
- Only 13% had escalated into violent crises, and 6% were at post-conflict resolution, suggesting that most conflicts could still be resolved through preventive legal empowerment means such as dialogue and mediation.

Land Size and Access

- 50% of conflicts reported were on parcels of land measuring 50 acres and above.
- A significant variation existed in land utilized by household, ranging from 2 to 5 acres, with some households having no land at all. This questions the myth that families or households in rural Uganda (North and Eastern Uganda) still have huge tracts of land. The loss of land among rural Ugandan societies is mainly attributed to the rise of the land markets and investment demands for land for production.

Proof of Land Ownership

- 56% of respondents relied on family/clan/community meeting minutes as evidence of their land rights and belonging.
- 26% had no proof of ownership—a major vulnerability in land rights protection mostly leveraged by the powerful to grab land or violate land rights.
- Only 7% had land documents (sales agreements, land titles), indicating poor documentation practices. In some locations, people relied on natural or geographical physical features like rocks, valleys, or trees to trace and locate the start and end of their land.

Community-Investor Conflict Prevention Measures

Ranked by frequency of use:

- Community awareness meetings: 100%. This proved to be very effective in resolving conflicts through face-to-face dialogues between communities and investors by an outside and neutral party (LEMU).
- Dispute resolution committees: 38%. The limitations of the grievance redress committees lie within their sustainability to continue resolving cases even in the absence of LEMU. The redress committees are also affected by intra-community politics and mistrusts that might in turn risk the acceptance of results and resolutions.
- Promoting rentals over sales: 38%
- Hotlines and radio campaigns: under 40%
- Monitoring investor compliance: only 14%. This preventive legal empowerment measure was highly limited by the inaccessibility of most of the investors reported for causing disputes but also the outright refusal by investor to participate in the monitoring of investor compliance process.

Investment Dynamics & Community Impact

Types of Investments

- Common investments: cattle keeping, tree planting (forestry), crop farming, mining, and

road construction.

- 95% of investors are Ugandan, reducing complications of foreign jurisdiction—but not necessarily community harmony. Well as most investors were Ugandan, many were linked to the state or highly ranked government officials, which further complicated the implementation and adoption of the intervention mechanisms.

Community Grievances

Top complaints included

- Land grabbing, eviction, denial of compensation
- Environmental degradation (pollution, deforestation)
- Breach of agreements & unfulfilled promises
- Low or unpaid wages, displacement, and loss of access to communal resources
- Gross human rights abuses.
- Labor Exploitation

Positive Impact from the preventive legal empowerment approaches

LEMU's work has led to:

- Reduced hostilities between investors and communities but also within the communities for example the case of the community/family clash in Pakiri village, Amuru district
- Restored communication between investors and communities, the National Forestry Authority case and the community in Okwongodul sub-county, Dokolo district.
- Agreements on minimum wages
- Improved access to resources (e.g., firewood, water)
- Investors changing practice and behavior (e.g., no more animal confiscation)

Statistical Takeaways & Correlations

- Correlational insight: In areas where LEMU conducted community mass awareness campaigns, grievances reduced notably and investor cooperation improved.
- Limited land rights documentation is directly linked to increased land vulnerability.
- Where grievance redress committees were active, satisfaction and resolution rates were higher.

Structural and Operational Gaps Identified

- Boundary disputes persist due to a lack of clear demarcations of communal and family lands.
- Compensation delays were a recurring complaint identified among all piloted investments in all four (4) sub-regions.
- Weak investor accountability mechanisms, especially for environmental issues.
- Limited follow-up on promises and monitoring post-agreement implementation.

Conflict Type vs. Resolution Rate

Goal: Identify which conflict types are more or less likely to be resolved based on available data.

Data Points Used:

- Conflict Type (Land, Environmental, Labor, etc.)
- Status: Resolved / Pending / Ongoing

Interpretation:

- Land conflicts showed a relatively high resolution rate (~78%), likely due to LEMU engagement and prioritization.
- Labor conflicts had the highest resolution rate (83%), possibly because they involve clear, non-complex negotiable grievances like wages and work terms.
- Human rights violations were the least likely to be resolved (40%), likely due to their complexity and legal implications.
- Environmental Conflicts (64%) showed moderate resolution success, while,
- Border Conflicts (100%) were rare but clearly resolved due to geographical clarity.

Insight: Conflict type heavily influences resolution likelihood. Focused strategies are needed for human rights violations and breach of contract disputes.

Investor Type vs. Grievance Severity

Goal: Examined which investor types were more associated with severe grievances.

Variables:

- Type of investment (Cattle, Mining, Farming, Road Construction)
- Type and number of grievances (Land grabbing, eviction, pollution, etc.)

Interpretation:

- Mining operations/investments are linked to the highest severity grievances (9.2/10) due to environmental damage, displacement, labor violations, and pollution.
- Forestry/tree planting was also problematic (7.5) due to boundary issues, labor issues, unfulfilled promises, and blocked communal access.
- Cattle rearing (6.5) and crop farming (5.5) caused less severity but still presented conflicts, mainly around land ownership, use, and encroachment.

Insight: Therefore regulatory reforms should be intensified on mining due to higher severity impact on local communities.

Region-wise Conflict Pattern Analysis

Goal: Understanding conflict variation across four regions: Teso, Lango, Karamoja, and Acholi.

Variables:

- Number of cases per region
- Types of conflicts reported

Interpretation:

- Lango registered the highest number of total conflicts, especially land-related. This could be attributed to denser population or aggressive investment behaviors.
- Karamoja had a notably high share of environmental conflicts/complaints, consistent with known extractive operations.
- Acholi and Teso showed balanced conflict types but were still heavily dominated by land ownership issues.

Insight: Tailored regional intervention is critical. For example, heightening the enforcement of environmental regulations in the mining sector, and all four (4) regions showed the need for improved land tenure security.

Satisfaction Score Correlation Analysis— what drove satisfaction with LEMU?

Key Variables Identified for Correlation:

- Types of grievances resolved
- Nature of LEMU's intervention (e.g., mediation, compensation facilitation)
- Perceived investor behavior change
- Documentation support
- Continued rights violations post-resolution

Insights:

- Mediation-driven interventions had the highest satisfaction correlation, especially when LEMU facilitated mutual understanding and signed agreements between the community and the investors.
- Resolution of land access and compensation grievances was a strong determinant of satisfaction. When grievances led to financial or land restitution, satisfaction levels increased significantly.
- Investor attitude change post-LEMU involvement (e.g., stopping confiscation of animals, free access to water and firewood by community members) was highly correlated with community satisfaction.
- Continued threats or unresolved issues (environment damage, labor grievances or unfulfilled promises) were negatively correlated with satisfaction.

Impact Assessment of LEMU Interventions—Before vs. After Comparisons.

Table 1: Quantifiable Before vs. After Indicators:

Indicator	Before LEMU Interventions	After LEMU Interventions	Net Change
Investor confiscation of community animals	Frequent	Rare/Reported	↓ High
community fear (trauma) of investors	High	Low	↓ Significant
Land Rights Compensation Claims	Mostly Unaddressed	Mostly initiated	↑ Resolution Pathways advanced/increased (litigation options)
Mutual communication between investors and the community.	Minimal	High (through meetings/dialogues)	↑ Drastically
Environmental violations	Rampant	Mitigated (mercury disposal into communal rivers stopped, pollution of the Ayago River also halted)	↓ Moderately mitigated
Gender-specific access (e.g., women accessing firewood in Awer forest)	Restricted	Access granted.	↑ Inclusivity heightened

Conclusion: LEMU's interventions significantly reduced conflict tension and improved community-investor relationships. The emphasis on mediation, community education, and investor practice monitoring tools proved critical.

Gender Disparity in Conflict Involvement—Role of Men and Women

- Women were often involved in land use (e.g., firewood, crop cultivation) and were primary complainants in land access-related disputes.

- Men appeared more engaged in land ownership, compensation, and formal complaint submissions.
- Gender disparities were evident in who faced restrictions (e.g., firewood collection (women) pre-LEMU) and who benefited from wage labor or compensations post-intervention.
- **Post-LEMU:** Women gained greater freedom in forest access and resource usage but still faced challenges of exclusion in formal compensation and land rental negotiations.

Key Insight: LEMU's actions indirectly empowered women in local economies and land usage but did not fully address structural gender inequalities and vulnerabilities in conflict resolution processes.

Table 2: Land Size vs. Conflict Intensity— Are bigger lands more contested?

Land Size Category	% of Total Conflicts	% Reaching Crisis Level
> 50 acres	50%	80% of crisis cases
20–50 acres	18%	13% of crisis cases
10–20 acres	13%	5% of crisis cases
0–10 acres	19%	2% of crisis cases

Conclusion: Larger landholdings (>50 acres) are significantly more prone to escalated conflicts, likely due to greater investment interest and more profound displacement effects.

Likelihood of Conflict Escalation

Variables contributing to escalation:

- Lack of documentation (e.g., 26% had no proof of land ownership)
- Type of grievance (e.g., land grabbing, eviction, non-compensation)
- Size of land involved
- Type of investment (mining/quarrying saw higher conflict levels)
- Investor origin (non-Ugandan or unknown origins correlated with higher tensions)

Predictive Insight: Conflict escalation is most likely when:

- Land is > 50 acres.
- Documentation absent or disputed
- Investor involved in mining or high-displacement activities like large scale cultivation.
- Prior grievances involve eviction or denied access.

Cluster Analysis

Goal: To group regions by conflict characteristics

Table 3: Variables for Cluster Analysis

Category	Variables
Conflict Type	% of land conflicts, environmental, labor, breach of contract, human rights, border conflicts
Conflict Stage	% in pre-conflict, crisis, post-conflict
Land Size	% of conflicts by land size involved (e.g., above 50 acres, 0–10 acres, etc.)
Proof of Land Rights	% with clan minutes, rental agreements, nothing, land maps
Preventive Mechanisms	Community meetings, tracking databases, committees, media campaigns
Investor Origin	% Ugandan, foreign, Unknown
Grievance Types	Presence/absence of key grievances like land grabbing, eviction, pollution, etc.
Satisfaction/Resolution	% of cases resolved vs. pending; satisfaction with LEMU
Investment Type	Quarrying, mining, farming, fish ponds, etc.

Table 4: Clusters

Scale: A – Pre-conflict, B – Post-conflict, C – Crisis

Region	Dominant Conflict Type	Conflict Stage	Land Size	Cluster
TESO	Land use/access Conflicts	Pre-conflict	0–20 acres	A
LANGO	Land + Human Rights Violations	Post-Conflict	Mixed	B
KARAMOJA	Environmental + Land + Human Rights + Labor Conflicts + Breach of Conflicts	Crisis	>50 acres	C
ACHOLI	Land + Breach of Contract + Environment damage + Labor + Human rights violations.	Post-conflict	>50 acres	C

Table 5: Summary of statistical Insights:

Insight	Recommendation
Mediation of grievances correlates with the highest satisfaction.	Invest more in dispute resolution training and practice at the community level.
Larger landholdings lead to more severe conflict impacts.	Focus monitoring and early intervention on large land acquisitions and leases.
Women benefit more from LEMU indirectly as the primary users of the land.	Implement gender-focused grievance redress channels. It is evident that men and women have different experiences in the face of grievances.
Lack of proper land documentation heightens conflict risk.	Prioritize land documentation awareness and access.
Investor behavioral change drives law and order in the community.	Facilitate and prioritize investor-community engagement routines. Strengthen feedback channels at the community level.

Project Outputs

This action research on preventive legal empowerment—early alert and action to strengthen rights in the context of land-based investments—generated key outputs grouped in six (6) months across the 3 years. Through a combination of qualitative and quantitative methodologies, the project has documented cases of investment-related community rights violations, engaged stakeholders across multiple districts, and employed a range of participatory tools, including key informant interviews, focus group discussions, community meetings, investor compliance monitoring, three (3) policy briefs on green energy investments, forestry and general policy brief on research findings and recommendations, two project research report (in-country report and a general tri-country report from Center for Environment and Development in Cameroun, IIED in United Kingdom and LEMU in Uganda. This document aggregates the key qualitative and quantitative activities undertaken and serves as a foundation for further analysis, policy dialogue, and strategic action to strengthen land and community rights in Uganda.

1. Project Data Collection Tools and Infrastructure

Data Collection Tools (7 Total):

- Tool 1: Case Intake Form – for initial reporting
- Tool 2: Case Tracking/Mediation Form – used quarterly until closure
- Tool 3: Case Follow-up/Impact Form – post-intervention
- Tool 4: Participatory Monitoring of Investor Compliance
- Tool 5: Key Informant Interview Checklist
- Tool 6: Focus Group Discussion Guide
- Tool 7: Regional Conflict Hotspot Mapping Tool

Support Infrastructure:

- Online Data Entry System—for storage and statistical analysis
- Radio talk shows
- Radio spot messages translated into 6 languages

2. Table 6: Thematic Groupings of Activities

Theme	Activities
Community Engagement	Community meetings, focus group discussions (FGDs), awareness-raising and education meetings, Key Informant Interviews
Media Engagement and Dissemination	Radio Talk Shows, Radio Spot Messages, Video Documentaries, Learning Exchanges
Qualitative Research	Key Informant Interviews, FGDs, Monitoring of Investor Compliance, Desk Reviews of Data, one (1) in-country research report, one (1) tri-country research report (CED, IIED and LEMU)
Quantitative Analysis	Case intake/tracking/impact forms, statistical summaries of data.
Policy Engagement	Stakeholder dialogues, three (3) policy brief development, international learning exchanges
Capacity Building	Paralegal recruitment, core research Working group meetings, consortium collaboration
Conflict Resolution	Community dialogues, Litigation for cases of extreme rights abuses.

3. Table 7: Project Progression by Phase

Key: P stands for phase.

Phase 1: February – July 2022, Phase 2: August 2022 – January 2023, Phase 3: February – July 2023, Phase 4: August 2023 – January 2024, Phase 5: February – July 2024, Phase 6: August 2024 – January 2025.

Activity Type	Total Count	Details/Notes	
Key Informant Interviews (KIIs)	62	25 (P 2) + 5 (P 3) + 2 (P 4) + 26 (P 5) + 4 (P 6)	
Focus Group Discussions (FGDs)	24	11 (P 2) + 3 (P 3) + 7 (P 4) + 1 (P 5) + 2 (P 6)	
Community Meetings / Awareness Raising	66	12 (P2) + 18 (P3) + 28 (P4) + 7 (P5) + 1 (P 6)	
District Inception Meetings	9	All in conducted in P 2	
Stakeholder Dialogues / Mapping	13	1 (P3) + 1 (P4) + 7 (P5) + 4 (P6)	
Radio Talk Shows	9	5 (P2) + 2 (P3) + 2 (P4)	
Documentaries (Video/ Short)	3	1)	A documentary of land rights violations in Karamoja sub-region: https://youtu.be/PIEj1zEvkds
2)	A documentary on land rights violations in Karamoja sub-region (version 2): https://youtu.be/x9KXXOUR4Tc?feature=shared		
3)	Documentary on Knowledge and Satisfaction on investments on land in Dokolo and Amolatar districts in Lango sub-region: https://youtu.be/7PQPGmtIWtQ?feature=shared		
Monitoring and Evaluation	1	Done in P5 by a MEAL consultant	
Investor Compliance Monitoring	9	1 One (1) in Acholi sub-region, three (3) in Teso sub-region and four (4) in Lango sub-region	
Paralegal Engagements	32	-one (1) in Karamoja sub-region	

Activity Type	Total Count	Details/Notes	
Key Informant Interviews (KIIs)	62	25 (P 2) + 5 (P 3) + 2 (P 4) + 26 (P 5) + 4 (P 6)	
Focus Group Discussions (FGDs)	24	11 (P 2) + 3 (P 3) + 7 (P 4) + 1 (P 5) + 2 (P 6)	
Community Meetings / Awareness Raising	66	12 (P2) + 18 (P3) + 28 (P4) + 7 (P5) + 1 (P 6)	
District Inception Meetings	9	All in conducted in P 2	
Stakeholder Dialogues / Mapping	13	1 (P3) + 1 (P4) + 7 (P5) + 4 (P6)	
Radio Talk Shows	9	5 (P2) + 2 (P3) + 2 (P4)	
Documentaries (Video/ Short)	3	1)	A documentary of land rights violations in Karamoja sub-region: https://youtu.be/PIEj1zEvkds
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3)	Documentary on Knowledge and Satisfaction on investments on land in Dokolo and Amolatar districts in Lango sub-region: https://youtu.be/7PQPGmtIWtQ?feature=shared		
Monitoring and Evaluation	1	Done in P5 by a MEAL consultant	
Investor Compliance Monitoring	9	1 One (1) in Acholi sub-region, three (3) in Teso sub-region and four (4) in Lango sub-region	
Paralegal Engagements	32	-one (1) in Karamoja sub-region	
-one (1) in Acholi sub-region			
-14 in Acholi sub-region			
-16 in Lango sub-region			

International Learning Exchange	2	-Hosted at Awer Forest Reserve (P 5)	
-Hosted by CED in Cameroon in 2024.			
Policy Briefs	3	-on 3 thematic issues (Forestry, green energy Investments in Uganda, on general research findings and recommendations)	
Project Research Reports	2	-One (1) country (Uganda) level report and another on research results from CED in Cameroun and LEMU in Uganda supported by IIED in the United Kingdom.	
Core research working group engagements	3	All in P 6	
Publication on Rapid Response Mechanism to Investment Violations	50 copies printed	All in P 6	
A case study on land conflicts and nature-based solutions	1	P 6	
-Funded by International Land Coalition (ILC)			
Cases for Litigation	1	P 4	
-This was conducted to resolve the grievances between the communities in Opwateta village in Pallisa district versus Arab Contractors Uganda Limited.			
Total number of cases received	48	Recorded across the three (3) years.	
Note: Although the project has registered 48 cases, the number of individual grievances against these investments can be estimated to be above 1,000.			

Table 8: Number of people reached (direct project beneficiaries)

MALE	FEMALE	TOTAL
2,045	1,628	3,673

Note: These were recorded in the different project community meetings, focus group discussions, key informant interviews, stakeholder awareness and mapping campaigns, and district inception meetings.

Table 9: Indirect Project Beneficiaries

MALE	FEMALE	TOTAL
58,834,857	58,834,857	117,669,715

Note: These were reached indirectly through dissemination of project results on LEMU websites, dissemination of publications, through LEMU social media channels (X, YouTube, Facebook, LinkedIn), through radio talk shows, radio spot messages, and mainly through the international learning exchange hosted by LEMU in June 2024.



Project Outcomes

- 1. **Increased Community Legal Empowerment:** The project equipped rural communities in Uganda with the knowledge and tools necessary to proactively prevent and resolve land-related conflicts before significant damage occurs. Communities, particularly in Teso, Lango, Karamoja, and Acholi sub-regions, were empowered to engage directly with investors on land and governmental bodies, enhancing their agency and land rights protection.

- II. Strengthened Government-Community Collaboration:** The project has established and tested an effective collaboration model between government entities, civil society organizations (CSOs), and local communities. This collaboration led to the resolution of disputes, such as in the Awer Forest Reserve, where local leaders forced an investor to comply with community demands and legal boundaries. This success was strongly driven by both LEMU and the National Forestry Authority as a government body in charge of forestry.
- III. Identification and Mapping of Land-Conflict Hotspots:** Data collection tools allowed for the successful identification of conflict hotspots, including information on investments in mining, forestry, agriculture, and tourism sectors. Hotspot mapping exercises enabled the early identification of disputes, leading to timely interventions. The project developed a database for these cases, which can serve as a reference or support for future research and studies by other change agents.
- IV. Promotion of Investor Accountability:** Investors were monitored for compliance with land use, boundary agreements, and environmental standards. In some cases, such as with Ever Grandee Resources Ltd., this led to enhanced investor accountability for previously unmet community promises like scholarships and infrastructure development. After LEMU's empowerment of the community in Cheptokol village, Lokales sub-county, Amudat district, the gold mining investor (Ever Grande) agreed to offer a few scholarship to secondary school going children in the community as well as purchasing some water pipes to extend water to the community as an act of corporate social responsibility. It is important to note that, even though the investor did not fully meet his promises, the small change of behavior was entirely attributed to the collective pressure from the community empowered by the project.
- V. Promotion of the role of women in land governance:** The project supported women and marginalized groups in taking up leadership roles, particularly in community resource management. Although gender parity was not always achieved, the project made significant progress in promoting gender inclusivity. In the case of Awer forest in Dokolo District, where the investor returned some acres of land back to the community, this benefited mostly women who are the primary users of land. In the formation of the resource management committee in Pakiri village, Amuru district, the research ensured that women were also represented as a gender-responsive approach to social change.
- VI. Enhanced Research and Policy Advocacy:** Through qualitative and quantitative research, the project contributed to the development of valuable insights into grassroots preventive legal empowerment strategies. This study made available much-needed data that was used to develop policy briefs on mining, agriculture, and forestry which will be as advocacy tools to positively influence Uganda's land governance framework in the context of land-based investments.
- VII. Improved Conflict Resolution Approaches:** By using preventive legal empowerment approaches, many land-based conflicts were managed at a latent stage thereby preventing escalation into violent disputes. Community dialogues, legal aid services, and paralegal training were instrumental in resolving numerous cases. As the most effective legal empowerment strategy, LEMU continues to collaborate with government (ministries, agencies and departments) in advancing land rights for the local communities.

- VIII. Awareness on Environmental and Human Rights Compliance:** The project highlighted investor violations in environmental management, such as the misuse of mercury in mining activities, and brought these issues to the attention of local leaders and communities.
- IX. Documented Success of Preventive Legal Empowerment Approaches:** Documented case studies of how preventive legal empowerment helps communities to avoid investor conflicts and secure better agreements with investors. The collaboration of the government and LEMU in resolving a backlog of cases in Awer forest reserve reinstated peace in the communities living around the forest reserve.
- X. Strengthened Community Conflict Resolution Structures:** Establishment of community management committees and paralegal groups, empowered communities to manage disputes and prevent future violations through increased use of participatory governance in managing land-based investments and legal interventions. This measure contributes to sustainability beyond the project life.
- XI. Increased Awareness of Land Rights:** The project contributed to significant community awareness about land rights and the need for preventive legal empowerment, with over 117 million people reached through outreach efforts like community meetings, radio talk shows, spot messages, regional dialogues and conferences.

Project Impacts

1. In Amudat district, Lokales sub-county, Cheptokol village, through strategic community dialogues and collaboration with local government leaders, LEMU's preventive legal empowerment approach led to the suspension of environmentally harmful mining activities by Ever Grandee Company. It strengthened community representation and negotiation processes, and triggered growing community resistance (community power) against exploitative investment practices. Exercising community power compelled the gold investor to comply with implementing some corporate social responsibility, like granting a few scholarships to school-going children in the community, a commitment they only honored after the introduction of the preventive legal empowerment project.
2. As a result of implementing the preventive legal empowerment project in Awer Forest Reserve, LEMU successfully facilitated structured engagement between the local government of Dokolo district, the community, the National Forestry Authority (NFA), and the forestry investor. This led to key commitments aimed at resolving longstanding land and resource conflicts. The commitments included joint boundary marking to prevent encroachment disputes, improved community access to wetland resources without risking trespass penalties, written land rental agreements to promote transparency, community involvement in monitoring investor compliance with local revenue obligations, and NFA's pledge to allocate 5% of the forest land for community forestry initiatives. The project also bridged critical knowledge gaps around forest laws and conservation, empowering communities to advocate for their rights and coexist sustainably with forest management structures.
3. Enhanced dialogues among stakeholders: The project contributed to improved

coordination and public service delivery among local and national duty bearers in response to community-investor grievances. The preventive legal empowerment action research managed to pioneer rights protection milestones that had never witnessed in most aggrieved local communities for so many years. For example, the concerted efforts of LEMU, Dokolo district local government, police, and the National Forestry Authority (NFA) to question and correct the bad investment practices of the forest investor, in Awer forest reserve. For so long, the community had been suffering and lamenting about the maltreatment from the investor but nothing had been done to resolve the disputes. It was after the introduction of the project that justice was served in the community through well-coordinated efforts from all stakeholders involved. In Lokales sub-county, Amudat district, the district security team, LEMU and the environment officer halted the operations of the gold investor due to pollution of communal waters as well as confiscating some of the investor's machinery.

4. The project established baseline data to guide future interventions aimed at protecting the land rights of rural communities. It documented various community-investor grievances, organized by location across different project sites. In some cases, the project facilitated initial engagements and set up sustainable community-level structures—such as resource management committees and community champions—which can be leveraged by LEMU or other actors in the future. Additionally, the research identified emerging investment risks to land rights, including developments in green energy and just energy transitions. Notably, through this action research, LEMU authored and published an independent case study on land conflicts and nature-based solutions, using Bukoona Agro-processing Industry as a case example.

Policy Recommendations

1. Laws governing investments, land allocation and acquisition by investors should be reformed to provide for clear and proper procedures to be followed, allow for access to information about the investment, emphasize the conditionality of Free Prior Informed Consent and environmental protection and restoration during and after land-based investments, and participation of all stakeholders. Legislation should be revised to protect community rights, environmental sustainability, and investor interests equally. Current incoherencies between sectoral laws, such as land, forestry, and mining laws, create contradictions that exacerbate community-investor conflicts and litigation risks. Legislation that strongly protects community rights and establishes environmental protections can ensure stable investments, as communities with secure land and abundant resources are less likely to conflict with investment projects.
2. Prioritize preventative conflict resolution by addressing scarcity drivers. Prioritize preventative legal empowerment approaches to resolve or manage land related disputes or conflicts between communities and investors. Dialogues, negotiations and community meetings have proven to be powerful and effective tools for conflict resolution. Preventive legal empowerment approaches help to anticipate and deal with conflicts before lives are lost and property destroyed. To prevent conflicts, it is essential to identify and address the underlying scarcities driving many disputes, including land, water, and natural resources critical to community and household survival. Intervention should be directed towards

supporting community-investor dialogues, negotiations, and preventative resolution of emerging conflicts. Communities must retain ownership, control and management over enough lands, waters and biodiverse ecosystems to sustain their long-term well-being and thriving. Ecosystem restoration projects can also alleviate resource-based conflict, particularly in regions facing environmental degradation or climate change impacts. Such projects can be cost-effective and offer tangible benefits for communities while reducing the drivers of violent conflict.

3. Recognize, observe and protect community land rights during land-based investments. In most cases the communities are vulnerable vis-a-vis powerful investors therefore their rights should be protected in order to control dispossession and prevent hopelessness brought about by land rights violations.
4. Focus on early dialogue and equitable benefit-sharing. Governments and investors must engage potentially affected communities early in concession discussions to ensure that affected communities retain their rights – including rights of use, access, and livelihoods – to their lands, waters and ecosystems. Such early negotiations are critical to both community survival and the investment's long-term stability. In many cases, communities are willing to share resources if agreements are fair and provide meaningful benefits. However, when communities are left with no land or inadequate resources, conflicts become deeply entrenched, often requiring significant land restitution to resolve. Early dialogue should prioritize equitable benefit-sharing and the sustainability of community livelihoods to prevent the ignition and escalation of community-investor conflict.
5. Develop and make use of hotspot mapping and investor compliance monitoring tools to proactively forecast the likelihood of conflict and to identify high-risk areas. This gives opportunity and room for early engagements between communities and investors and dealing with disputes and conflicts from a point of agency. Tools like hotspot mapping and compliance monitoring are effective, low cost ways of forecasting where community-investor conflicts are likely to arise. This systemic approach enables organizations to identify areas at risk and engage early with both communities and investors. Putting the locations of all villages, concessions, protected areas, and other restricted areas on the same maps can show government and advocacy organizations where conflicts are likely to arise. This allows advocates to proactively reach out to affected communities, investors, and other key stakeholders to initiate dialogue, fair negotiations, preventative interventions designed to diffuse conflict and ensure community thriving, and the establishment of safeguards to protect community rights. Similarly, enrolling community members in routine monitoring of investor compliance can spot violations early, before such violations result in impacts that are difficult to remedy. Such early engagement can prevent costly disputes; investors may be enrolled in such efforts, as failing to respect community rights may put their investments at significant risk.
6. Create accessible and trusted dispute resolution mechanisms. It is necessary to create easily accessible, trusted fora where communities can bring and resolve complaints quickly and effectively. Land conflict resolution responsibilities are best assigned to trusted, long-standing local authorities, many of whom were born and raised in the region and have deep knowledge of the area's social, political, and cultural contexts. Alternatively, religious and cultural authorities could also be trained to play a role in land conflict resolution, as they often have significant legitimacy in the eyes of the people.

While these individuals may need conflict resolution-related training and skill-building, it is more efficient and effective to invest in their skill sets than to invest in a civil servant on a short-term assignment.

7. Address power asymmetries by leveraging the media and providing information to communities.

Advocates can proactively strengthen communities' ability to advocate for their rights by providing them with access to critical information about both a) their rights under national and international laws; and b) the details of the investment affecting them. When investors are hostile or adverse to dialogue and negotiation, advocates may gain traction by garnering public and media attention for their cases: media coverage and visits from funders can create pressure on investors, making them more open to fair negotiation and conflict resolution.

8. Leverage strategic alliances with the government and strengthen local leaders' accountability.

Advocacy efforts may be most successful when partnering with government allies to enforce laws and confront investors' illegal practices. One of the primary learnings from this work was that it is necessary to leverage the legal power of the state to confront illegal power. Efforts to educate and train government administrators and otherwise increase their political will to support communities in the peaceful resolution of community-investor conflicts should be explored and implemented at scale. Relatedly, it is necessary to build accountability mechanisms within communities – aimed specifically at holding leaders accountable - to reduce the risk of local leaders being bribed and co-opted. Investors may be enrolled in such efforts, as early and effective intervention will ultimately protect their interests over the long term.

9. Ensure marginalized groups are fully represented and create space for their participation.

It is critically necessary to proactively include representatives of marginalized groups in all discussions about community-investor conflicts. This is because land-based conflicts affect community members differently depending on their livelihoods, identity, and vulnerability, women and Indigenous Peoples often bear the brunt of any negative impacts of investment activities. Conflict resolutions tend to reflect only the interests of dominant groups which further marginalizes vulnerable populations, particularly women and Indigenous Peoples. To address the disproportionate impact of land investments on marginalized groups, conflict resolution processes must intentionally ensure that marginalized voices are heard and respected. Conflict resolution mechanisms should capture and reflect the unique perspectives of women and Indigenous Peoples, with separate consultations, if necessary, to prevent dominant narratives from overshadowing their experiences. Their involvement is essential to both a) include their perspectives, knowledge and wisdom and b) ensure that their interests and needs are considered for within any resulting conflict resolution outcomes. Without such measures, conflict resolution efforts risk perpetuating inequities and deepening social divisions.

10. Establish or strengthen existing Multi-stakeholder platforms in regions where investment violations are rampant. In most cases in Uganda, communities were found to be suffering violations in isolation and without knowledge of where they could have their

grievances sorted. The state leaders and law enforcement agencies on the other hand also ignored the violations against the community, as some got co-opted to become agents of the investor. In such contexts, the individual community members or rights defenders who rose up to demand accountability were persecuted on an individual basis. It was clear that the affected community members lacked a collective voice to speak against investors and speak to power, as had been the case with an abusive forest investor in Dokolo district. One of the strategies LEMU employed was to create a multi-stakeholder platform where community members, investors, non-state leaders, local government leaders, politicians and central government agencies were invited and community grievances and demands reported. Community members were encouraged to speak their grievances in the presence of media that made such grievances public issues. It was through this process of a multi-stakeholder forum that most actors began to take up their roles as the communities began to report positive change and improved relations with the investment projects, as was the case in Okwongodul sub-county, Dokolo district in the context of a forest reserve land-based investment. In this case, the multi-stakeholder forum became a forum for both accountability and learning.

The Research Results Dissemination Plan

To maximize the impact of the preventive legal empowerment action research, the research results dissemination plan outlines a targeted strategy to share key findings, engage stakeholders, and drive meaningful action. Recognizing that evidence alone is not enough to create change, this plan prioritized accessible communication, strategic outreach, and participatory engagement to ensure our results reach the right audiences in the right formats. By leveraging a mix of traditional and innovative channels—including policy briefs, social media, stakeholder workshops, etc.—LEMU aimed to, inform decision-making among policymakers and practitioners, empower communities with actionable knowledge, foster collaboration across sectors to scale solutions and ensure sustainability by embedding findings into practice and advocacy. This plan adapted to the needs of diverse audiences, from technical experts to grassroots organizations, translating complex data into clear, compelling calls to action.

Table 9: A table showing research dissemination plan

Activity	Person In-charge	Target Audience	Implementation Progress	Purpose of the Activity	Deadline
Bi-annual presentation of research findings	Co & Principal Investigator, Project Manager, Project Officers, Communication Officer	Media ,Research organizations, Academia , NGOs/CSOs, Investors Government ministries, departments and agencies - MDAs (Lands, Water and Environment, Energy, UIA), Community representatives, Local governments Politicians	-The project held two (2) regional stakeholder dialogues in Karamoja and Teso sub-region in the third interim reporting period (1 st February – July 2023) and forth (1 st August 2023 – 31 st January 2024) -The project also disseminated research findings about the grievances generated by one investor in Awer forest reserve Dokolo district during the International Global Learning week organized by International Land Coalition (ILC) and hosted by LEMU in June 2024.	-This initiative sought to engage stakeholders in collaborative dialogue, ensuring their active participation in co-designing solutions mining affected communities.	-Already implemented.
project consortium final research report	Consortium Partners in Uganda, Cameroon and United Kingdom.	Media, Research organizations, Academia NGOs/ CSOs, Investors Government ministries, departments and agencies - MDAs (Lands, Water and Environment, Energy, UIA), Community representatives, Local governments Politicians	-The project consortium leads from Uganda, United Kingdom and Cameroon have a second draft of the overall consortium report.	-To systematically document and share research findings, insights and recommendations to inform decision-making, influence policy and drive actionable change among stakeholders.	-Consortium research report submitted before end of August 2025
Uganda- Final Technical research report	Research and project Team in Uganda	Media, Research organizations, Academia , NGOs/CSOs, Investors Government ministries, departments and agencies - MDAs (Lands, Water and Environment, Energy, UIA), Community representatives, Local governments Politicians	-LEMU finalized the country research report for Uganda.	-To systematically finalize, document and share research findings, insights and recommendations to inform decision-making, influence policy and drive actionable change among stakeholders.	-Report completed and submitted
Held one (1) national dissemination workshop	Co & Principal Investigator, Project Manager, Project Officers, Communication Officer	Media, Research organizations, Academia , NGOs/CSOs, Investors	-The research and project team organized one national dissemination workshop to share	-To actively bridge knowledge to action gaps through participatory analysis and planning.	August 2025

		Government ministries, departments and agencies - MDAs (Lands, Water and Environment, Energy, UIA), Community representatives, Local governments Politicians	project results and insights with relevant stakeholders.		
Write two (2) policy briefs	Co & Principal Investigator	- Government ministries, departments and agencies - MDAs (Lands, Water and Environment, Energy, UIA), Community representatives, Local governments Politicians	-The project principal investigators wrote two policy briefs, 1) on the overall policy recommendations with findings from the action research project, 2) on the evolution of green energy (just transitions) projects in Uganda.	-To refine research findings into concise and actionable recommendations that inform and influence policy decisions.	-July 2025
Electronic dissemination of research findings	Communications Officer	Media, Research organizations, Academia , NGOs/CSOs, Investors Government ministries, departments and agencies - MDAs (Lands, Water and Environment, Energy, UIA), Community representatives, Local governments Politicians	-On-going dissemination through LEMU electronics spaces (YouTube, X, Facebook, LEMU websites) with key project documents like the policy briefs, research reports, press briefings et cetera and other media spaces	-To rapidly amplify research reach, engage diverse audiences in dialogue and translate evidence into public discourse and action.	-Continuous

References

1. Adam Branch (2011) *“From Camp to Slum”: The Politics of urban Displacement in Gulu Town, Uganda*. MISR Working Paper No.2
2. Aili Mari Tripp (2014) *“Women’s Movements, Customary Law, and Land Rights in Africa: The Case of Uganda”*. *African Studies Quarterly*. <http://asq.africa.ufl.edu/files/Tripp-Vol-7-Issue-4.pdf>
3. Centre for Basic Research (November, 2016) *“Interrogating Large-Scale Land Acquisitions and Land Governance in Uganda: Implications for Women’s Land Rights”*. Research Report
4. Christopher Burke and Steve Hodges (2017) *“Business Process for Land-Based Agribusinesses in Uganda and Tenure Security for Large Scale Agriculture Initiatives in Northern Uganda and the VGGTs”*. FAO (UN PUBLISHED)
5. Florence Ebila & Aili Mari Tripp (2017): *“Naked transgressions: gendered symbolism in Ugandan land protests, Politics, Groups, and Identities”*, DOI:10.1080/21565503.2016.1273122
6. Godber Tumushabe, Alex Tatwangire and James Meyers (2017) *“Catching up with the fast pace of land access change in Uganda”*. International Institute for environment and Development – IIED
7. John Jagwe and Chris Burke (Dec. 2017) *“Development of Inclusive Business Models (IBMs) for leveraging investments and development in Acholi sub-region” and an IBM User Guide*. Unity is Strength, Trocaire, Democratic Governance Facility (DGF) and Farmgain Africa Ltd.
8. Lillian Namukasa (Dec. 2017) *“Instituting Protection of persons with disabilities rights to customary land ownership in Acholiland”*. Unity is Strength, Trocaire and Democratic Governance Facility (DGF)
9. Mahmood Mamdani (2015) *“The Contemporary Ugandan Discourse on Customary Tenure: Some Theoretical Considerations”* in, *The Land Question: Socialism, Capitalism and the Market*. Mahmood Mamdani (ed). Makerere Institute of Social Research. Pp 158 – 194
10. Matt Grainger and Kate Geary (2011) Case Study: *“The New Forest Company and its Ugandan Plantations”*. OXFAM International
11. Ojok Advocates (n.d) *“A step-by-step guide on land dispute resolution mechanisms in Acholi, Northern Uganda”*. Joint Acholi Sub-regional Leaders Forum and Trocaire
12. Ronald R. Atkinson, James O. Latigo and Emmet Bergin (June, 2016) *“Piloting the protection of rights to customary land ownership in Acholiland: A research project of the Joint Acholi Sub-regional Leaders Forum (JASLF) and Trocaire; Summary Report on the field-research component”*. Unity is Strength, Trocaire and Democratic Governance Facility (DGF)
13. Trocaire, OXFAM and CONCERN (2014) *“Power and Vulnerability in land dispute resolution: Evaluating responses to domestic land grabbing in Northern Uganda”*. A publication of Northern Uganda Land Platform

RESEARCH REPORT

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**Funded by:
International Development Research Centre (IDRC)**

DISCLAIMER: This work was carried out with the aid of a grant from International Development Research Centre (IDRC), Ottawa, Canada. The views expressed herein do not necessarily represent those of IDRC or its Board of Governors.

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