

**OFFICE OF THE
LEADER OF THE OPPOSITION**

**ALTERNATIVE POLICY STATEMENT
TOURISM, WILDLIFE AND ANTIQUITIES.**

FOR THE FY 2022/2023

PRESENTED BY

HON MASABA KARIM

SHADOW MINISTER FOR TOURISM, WILDLIFE AND ANTIQUITIES.

MARCH, 2022

Table of Contents

LIST OF ACRONYMS AND ABBREVIATIONS.....	3
EXECUTIVE SUMMARY.....	4
1.1 Legal Provisions.....	6
1.2 Sector Overview.....	6
2.0 BUDGET ANALYSIS.....	7
2.1 BUDGET ALLOCATIONS.....	7
3.0 EMERGING ISSUES AND ALTERNATIVES.....	12
4.0 CONCLUSION.....	21

LIST OF ACRONYMS AND ABBREVIATIONS

LOP	The Leader of the Opposition
MDRs	Market Destination Representatives
MFPEd	Ministry of Finance, Planning and Economic Development
MICE	Meetings, Incentives, Conferences and Events
MICT	Ministry of Information, Communication and Technology
MoWT	Ministry of Works and Transport
MTEF	Medium Term Expenditure Framework
MWE	Ministry of Water and Environment
NBFP	National Budget Framework Paper
NTR	Non Tax Revenue
POU	Parliament of Uganda
PSFU	Private Sector Foundation Uganda
UGX	Uganda shillings
USD	United States Dollar
UTB	Uganda Tourism Board
UWA	Uganda Wildlife Authority
UWEC	Uganda Wildlife Education Center
UWA	Uganda Wildlife Authority
UHTTI	Uganda Hotel and Tourism Training Institute
UWRTI	Uganda Wildlife Research and Training Institute

EXECUTIVE SUMMARY

Under Rule 14 in the Rules of Procedure, the Shadow Minister shall submit their Alternative Policy Statements to Parliament by the 29th of March every year. As the Shadow Minister for Tourism, Wildlife and Antiquities, I hereby present the Alternative Policy Statement for Tourism, Wildlife and Antiquities for FY 2022/23.

Following the Tourism, Wildlife and Antiquities MPS FY 2022/23, proposed funding is UGX 162.774 with a noticeable reduction from Ushs 178.956 billion in the FY 2021/22 which is 9.0% reduction. Government has for the last five years continually underfunded tourism development allocating it less than 1% of the national budget despite it being the highest annual forex earner of the country contributing USD 1.6Bn and contributing 8% of GDP before COVID-19.

This alternative policy statement analyses the following emerging issues and proposes their alternatives.

Untapped tourism potential. Uganda has a lot of untapped tourism potential that can offer unique tourism products especially under extreme adventures, water tourism, sports tourism, food tourism, cultural tourism and historic tourism. Development of more tourism products should be tailored towards growth of leisure and cultural tourism where Uganda has both a competing advantage and high return rates

Limited and uncoordinated tourism promotion and marketing. Promotion and marketing of Ugandan tourism products has been duplicated to many agencies which makes it hard to supervise and coordinate the activities hence the need to review and publish a tourism marketing strategy.

Human wild life conflicts. There are several reports of human wildlife conflicts around almost all National parks in Uganda, some have led to loss of both human and wild lives. Develop and implement a human wildlife compensation policy to support the UWA act.

Inadequate infrastructure facilitating tourism. Most of Uganda's tourist sites have poor road access with no alternative means of transport such as water, rail and air .The country has a very limited number of direct flights into the country. There is also unreliable power, water and ICT services upcountry. MoWT, MWE, MEMD and MICT must prioritize construction of tourism roads and other alternative transport means, piped water supply, reliable electricity and ICT services

Inadequate and substandard Skills and manpower. The country boasts of only two government tourism related training institutes that are almost non-operational which explains the skilling gap. Training and skilling tourism manpower which should be done by first reviving the two tourism and wildlife government training institutes

Land ownership of tourism sites by individuals and people encroaching and getting land titles on protected areas. MTWA must ensure that all protected areas and tourism sites owned by Government get land titles and MWTA should also formulate a policy for public private partnerships with tourism sites' owners especially those that are unable to develop the sites

Neglecting of tourism small and medium enterprises after the Covid-19 pandemic. Establish and operationalize a tourism investment fund and Re-evaluate the taxation policy to support recovery of the tourism sector

1.0 BACKGROUND TO ALTERNATIVE POLICY STATEMENT

1.1 Legal Provisions

In line with section 6E (4) of the Administration of Parliament Act (2006) , "The Leader of the Opposition shall study all policy statements of government with his or her shadow ministers and attend committee deliberations on policy issues and give their party's views and opinions and propose possible alternatives"¹.

Under Rule 147 in the Rules of Procedure, the Shadow Minister shall submit their Alternative Policy Statements to Parliament by the 29th of March every year².

In light of the above legal frameworks, being the Shadow Minister for Tourism, Wildlife and Antiquities, I hereby present the Alternative Policy Statement for Tourism, Wildlife and Antiquities for FY 2022/23.

1.2 Sector Overview

The goal of the Tourism development programme is to increase Uganda's attractiveness as a preferred tourist destination, which is meant to contribute to the attainment of NDP III objective one of enhancing value addition in key growth opportunities³.

NDPIII key tourism expected results are quite ambitious but very attainable only if government invests the required funds in tourism product development and promotion, staffing tourism MDAs, development of infrastructure that facilitates tourism, prevention/ management of human-wildlife conflicts, training and skilling tourism manpower, acquisition of land titles for tourism sites and a tourism investment fund.

However, government has for the last five years continually underfunded tourism development allocating it less than 1% of the national budget despite it being the

¹ Administration of Parliament Act, 2006

² POU, Rules of Procedure of the Parliament of Uganda, 2021

³ NPA, NDPIII, 2020

highest annual forex earner of the country contributing USD 1.6Bn and contributing 8% of GDP before COVID-19⁴.

2.0 BUDGET ANALYSIS

2.1 BUDGET ALLOCATIONS

According to the NBFP FY 2022/23- FY 2026/27, the tourism development programme resource allocation FY 2022/23 is UGX 167.8Bn⁵. However the proposed budget by Ministry of Tourism, Trade and Industries is 176.9Bn distributed to various MDAs as follows; UGX 20.158Bn MTWA, UGX 119.469bn UWA, UGX 11.918bn UWEC , UGX 5.731bn UHTTI, UGX 3.185bn UWRTI, and UGX 16.39bn UTB⁶. Missions abroad and KCCA also have a budget for tourism UGX 4.638bn and UGX 0.91bn respectively, making a total of 181.6bn⁷.

Following the Tourism, Wildlife and Antiquities MPS FY 2022/23, proposed funding is UGX 162.774⁸ with a noticeable reduction from Ushs 178.956 billion in the FY 2021/22 of 9.0%. furthermore, the Ushs **181.619 billion** approved by Parliament in the National Budget Framework Paper for the FY 2022/23 – 2026/27 is not reflected anywhere in the Ministerial Policy Statement. It is therefore not clear whether the Ministry of Tourism, Wildlife and Heritage just used the figures due to lack of revised and final NBFP.

FY	2021/22	2022/23	Variance
wage	5.379	3.524	1.855
Non-wage	157.281	140.418	16.863
Dev. GoU	16.296	3.847	12.449
Dev. Ext. Fin	0.000	0	0.000
Grand Total	178.956	147.954	31.002

⁴ CSBAG, Tourism development position paper on the NBFP 2022/23, 2022.

⁵ MFPED, NBFP FY 2022/23- FY 2026/27, Table 3,2021

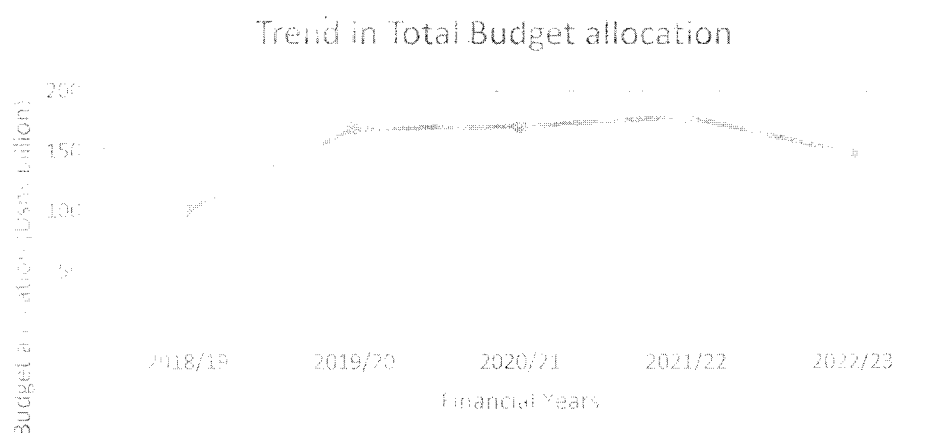
⁶ MFPED, NBFP FY 2022/23- FY 2026/27,Page 48, 2021

⁷ MFPED, NBFP FY 2022/23- FY 2026/27, Table P1.1,2021

⁸ MTWA, MPS 2022/23, page 11,2022

Source: Data from MoFPED, Approved Budget Estimates for FY 2021/22 and MPS for Tourism FY 2022/23

In addition, going by Ushs 147.954 billion⁹ a figure of proposed funding for the next FY 2022/23 that is in the Ministerial Policy Statement for Medium-Term Budget Allocations there is a 17.3% reduction from Ushs 178.956 billion that was approved in FY 2021/22. This is likely to negatively impact and derail effective implementation and attainment of the NDPIII targets.



Source: Plotted by OLOP using data from the Ministry of Finance, Planning and Economic Development

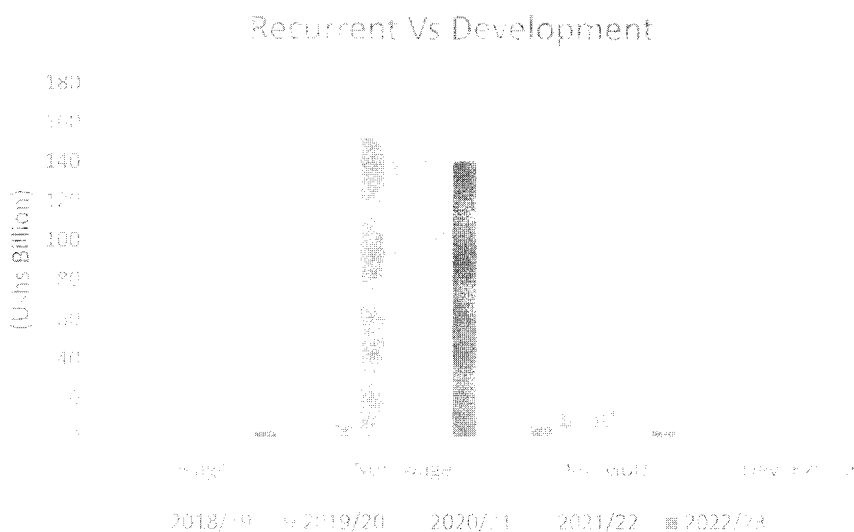
Overtime there has been a very big gap as observed from FY 2019/20 between recurrent (wage & non-wage) and development.

In the FY 2022/23, there are no external partners when it comes to financing developments and government's financing of its sector in terms of development is at its lowest.

Ushs **275.86 billion** target estimates for the FY 2022/23⁹ was allocated for the Tourism Development Programme Implementation Action Plan of which only Ushs 162.774

⁹ MTWA, MPS 2022/23, page 29,2022

billion was proposed for the sector with a shortfall of Ushs 113.086 required as per NDPIII.



Source: Plotted by OLOP using data from the MFPED and Ministerial Policy Statement FY 2022/23 for Tourism, Wildlife and Antiquities.

Although Training and Skills Development according to the follow-up in the MPS may have contributed largely in one way or the other to such an increased non-wage level, the ministry should extract all possible ways to balance the two (wage and non-wage) for proper management and motivation of officers involved in the smooth running of the sector.

Government has been over time grappling with limited resources in funding developments of the sector with no support from external (see graph below). It is also observed that there's a 76.4% reduction from FY 2021/22 to that proposed in FY 2022/23. This puts the sector at spotlight in terms of development with such a high reduction, variance and flat projection.



Under the guiding principles as observed in the Uganda Tourism Development Master Plan, 2014- 2024, Government must provide an enabling framework for the industry to flourish and also to create development in the context of regional cooperation with other states. Although the government has put in place an enabling investment environment and incentives, there is still inadequate investment in the tourism sector for instance, Ushs 275.86 billion target estimates for the FY 2022/23 was allocated for the Tourism Development Programme Implementation Action Plan of which only Ushs 162.774 billion was proposed for the sector with a deficit of Ushs 113.086 required as per the NDP III.

The MTEF allocation does not reflect the recommendation by the NDP III of allocating 275.86Bn in the FY2022/23 vis-a-vie what is allocated of 162.774 billion in the Ministerial Policy Statement. The programme has always been underfunded in comparison to the NDP III recommended allocations, this will affect the expected results of the NDP III.

Summary PIAP Annualized Costs by Sub-Programmme

MDA	FY 2020/21	FY 2021/22	FY 2022/23	FY 2023/24	FY 2024/25	Total
DLGs	0	0.5	1	2	1.5	5
MFPED			0	3.66	0	3.66
MIA-DCIC	38.33	1.52	1.52	1.03	1.52	43.92
MoES	0.05	0.05	0.05	0.05	0.05	0.25
MOFA	0.05	1.16	1.33	1.83	1.41	5.78
MoFPED	0		0	0	0	0
MoICT&NG	3	6	6	6	6	27
MoWE	0.01	0.02	0.02	0.03	0.02	0.1
MoWT		4	6	22	8	40
MTWA	37.79	61.71	59.27	53.90	55.45	268.11
UBC	0.6	0.6	0.6	0.6	0.6	3
UCAA		37	47	55	51	190
UEPB	0.00	0.48	0.68	0.87	1.03	3.06
UHTTI	0.04	3.64	0.64	0.14	1.14	5.60
UIA	1.25	1.25	1.25	1.25	1.25	6.25
UNRA	0.00	37.00	92.50	83.90	85.10	298.50
UTB	15.94	23.68	31.25	36.38	33.88	141.13
UWA	13.26	17.51	16.76	19.36	19.01	85.88
UWEC	21.00	9.50	9.50	9.50	9.50	59.00
UWRTI	0.50	0.80	0.50	0.50	0.50	2.80
Grand Total	131.82	206.41	275.86	297.99	276.96	1,189.04

3.0 EMERGING ISSUES AND ALTERNATIVES

1. Untapped tourism potential. Uganda has a lot of untapped tourism potential that can offer unique tourism products especially under extreme adventures, water tourism, sports tourism, food tourism, cultural tourism and historic tourism, which reduces the number of tourism products offered. Currently Uganda's major tourism revenues come from wildlife with over 50% earned from gorilla permits. The lesser the number of tourism products, the lower the length of stay, which negatively affects overall expenditure of tourists¹⁰. The average length of stay for leisure tourists was 8.3 days, and the average spending per visitor per day was USD 111¹¹ compared to 10 days in Kenya¹².

Furthermore, the available tourism products do not favor and promote domestic tourism. The survey that was conducted by MTWA in 2017 confirms the limited domestic tourism consumption, accordingly, the main purpose of travel for domestic tourists is leisure, relaxation and holiday (89.9%) followed by business prospecting (3.9%), religious activities (1.4%), conference and meetings (1.4%)¹³. However, given the limited number of leisure tourism products that suit the preferences and budgets of domestic tourists, the country loses out on domestic tourism revenue.

Alternatives

Tourism product development. Development of more tourism products should be tailored towards growth of leisure and cultural tourism where Uganda has both a competing advantage and high return rates such as, this will increase the number of tourists and their length of stay. In addition, leisure tourism will increase domestic

¹⁰Daniel Scott & Michael Hall, Global trends in length of stay: implications for destination management and climate change, 2018.

¹¹ NPA, NDPIII, 2020

¹² World Bank Group, Kenya's Tourism: Polishing the Jewel, 2010.

¹³ MTWA, tourism survey, 2017.

tourism consumption since 89.9% of the domestic tourists engage in leisure tourism compared to business tourism (3.9%), religious tourism (1.4%) and MICE (1.4%)¹⁴, however the tourism products should further be customized to suit domestic consumption in terms of pricing and flexibility.

Tourism sites should be developed to offer activities tourists can engage in other than just a sight and a story, and those with one or two activities, should create more so that tourists spend more time at the site.

2. Limited and uncoordinated tourism promotion and marketing. Promotion and marketing of Ugandan tourism products has been duplicated to many agencies which makes it hard to supervise and coordinate the activities. Missions abroad and KCCA budgeted UGX 4.638bn and UGX 0.91bn respectively for tourism promotion and marketing¹⁵, yet the MTWA is not involved and is not aware of what is budgeted for, therefore cannot supervise and hold them accountable¹⁶.

Furthermore, tourism promotion and marketing in Uganda is underfunded in comparison to her neighboring countries. Uganda Tourism board which is mandated to promote and market destination Uganda operates with 39 staff which is less than 50% of the ideal total staff¹⁷, this leaves them incapacitated to carry out their mandate yet the even the few MDRs in the few countries can hardly be sustained due to the budget cuts of FY 2021/22. This explains the low numbers of leisure tourists which is 19% of the total number of visitors received in 2019¹⁸.

¹⁴MTWA, tourism survey, 2017.

¹⁵ MFPED, NBF 2022/2023- 2026/2027, 2021

¹⁶ Parliamentary committee TT&I, Committee report on the NBF 2022/2023- 2026/2027 to the Budget committee of Parliament of Uganda, 2022

¹⁷ UTB, Presentation of the tourism development budget framework paper to the Parliamentary committee on Trade, Tourism and Industries, 2022.

¹⁸ UBOS, Statistical Abstract, 2020.

Table showing comparison of Uganda's tourism funding with Kenya and Tanzania.

Country	Total tourist arrivals in 2019 (Millions)	Percentage of leisure tourists to total tourists arrivals in 2019	Tourism budget allocation in 2020/2021 (Billions)	Percentage of tourism allocation to national budget.
Uganda	1.54	19.3%	Ushs. 197.3	0.36%
Tanzania	1.53	69.8%	Ushs 617.1	1.1%
Kenya	2.05	71.9%	Ushs 542.9	1.8%

Source: MTWA, 2022. Presentation of the Tourism programme NBFP 2022/23-2026/27 to the Parliamentary committee on Trade Tourism and Industries.

According to the above table, Kenya and Tanzania invests 3 times more than what Uganda invests in tourism and a bigger percentage is dedicated to marketing and promotion. As a result Kenya and Tanzania receive 7 leisure tourists in every 10 visitors compared to Uganda's 2 out of 10 visitors. This has affected tourism revenues in the country, hence receiving the lowest foreign exchange earnings in the country despite having unique natural tourism products.

Alternative

Review and publish a tourism marketing strategy. The Uganda Tourism Act Article 7(1) a and b mandates UTB to formulate, in cooperation and in consultation with the private sector and relevant entities, a marketing strategy for tourism in Uganda, and to implement the marketing strategy and to promote Uganda as an attractive and sustainable tourist destination¹⁹. UTB must therefore review and publish a tourism marketing strategy to guide all MDAs and private entities on how to plan and implement all tourism promotion and marketing activities in line with

¹⁹ Uganda Tourism Act, 2008.

the strategy and with approval of UTB. The strategy should focus on promotion of products where we have a higher competitive advantage and have higher turn rates and also include new and less known products to pitch for their demand, however all this must be facilitated with additional funding of the sector particularly in promotion and marketing.

3. Human wild life conflicts. These occur when the needs and behavior of wildlife impact negatively on humans or when humans negatively affect the needs of wildlife. These range from crop damage, livestock predation, habitat disturbance and destruction, and killing of both human and wildlife. There are several reports of human wildlife conflicts around almost all National parks in Uganda, some have led to loss of both human and wild lives.

The Uganda Wildlife Act Article 84 provides for compensation of a person that suffers bodily injury or is killed or suffers damage to his or her property. However the MTWA has neither a compensation policy nor guidelines to effect the law and therefore the compensation fund can't be operationalized. This has increased the victims' suffering and caused resistance to wildlife and tourism by the communities leading to acts such as poisoning of lions that happened in Queen Elizabeth National Park in March 2021.

Furthermore the community wildlife committees and compensation verification committees composition as per the Uganda wildlife Act Article 20 and 82 respectively disempower communities because MDAs set the terms and conditions on top of having more representatives.

Alternative

Develop and implement a human wildlife compensation policy. There is urgent need for a compensation policy to guide on the criteria and procedure of compensation of human wildlife victims. This will facilitate management and harmonization of human wildlife conflicts.

UWA should borrow a leaf from the Zambia National Parks and Wildlife Policy 2018 to promote wildlife-based economic activities within wildlife corridors to provide benefits to local communities, build capacity of communities to response to incidences of human wildlife conflict and facilitate the involvement of other stakeholders in dealing with HWC²⁰.

Amend the UWA Act to include composition of the community resource boards composed of community members like in the Zambia wildlife Act articles 32- 35²¹. These boards will help in involving the community in human wildlife conflict management.

4. Inadequate infrastructure facilitating tourism. Most of Uganda's tourist sites are located in the remote areas far away from the major city, with poor road access²² with no alternative means of transport such as water, rail and air. For example Bwindi roads are sometimes completely blocked as a result of landslides during the rainy season, disrupting tourist movement, Kidepo Valley National Park, and Bwindi Impenetrable National Park have very long road distances from the airport which discourages or causes fatigue to tourists yet they want to travel conveniently and comfortably without physical stress. It should also be noted that absence of an efficient public transport system connecting to tourism sites discourage those without private means especially domestic tourists yet hiring transport means is expensive.

The country has a very limited number of direct flights into the country thus making the international transport cost more expensive in comparison to the region comparators. The high costs of services such as landing fees are also still key inhibitors to direct flights. According to the PSFU, this factor is undoubtedly one of the main reasons for the low volume of air traffic at Entebbe.

²⁰ Government of Zambia, National Parks and Wildlife Policy, 2018

²¹ Zambia Wildlife Act, 2015

²² NPA, Enhancing competitiveness in Uganda's tourism sector for growth and employment, 2013

Table showing Airport charges for Uganda, Kenya and Tanzania in 2014

2014 - Airport	Landing (US\$/ton)	Example A320 -73 tons (US\$)	Charge/user (\$US)
ENTEebbe (CAA)	6	443	60
DAR ES SALAAM (TAA)	5	365	40
JOMO KENYATTA – NAIROBI (KAA)	3	219	20 (2010)

Source: National aviation authorities of Kenya, Tanzania and Uganda.

There is also unreliable power, water and ICT services upcountry that leads to inadequate and low quality accommodation that is relatively expensive due to high operational costs which reduces competitiveness in the region²³. The lack of access to electricity is constraining tourism development in some important tourism areas including five of the National Parks that are without any on-grid power supply. The high energy costs from generators or alternative energy sources such as solar power, serve as a deterrent to would-be investors and a financial liability for those currently operating in these areas.

In addition, most of the National Parks do not have access to piped water supply, they use water from lakes and rivers for example QENP gets water from the Kazinga Channel, MFNP from the Nile and Kibale Forest from a crater lake. At Lake Mburo, they use bowsers to transport water to a reservoir adjacent to the park headquarters. In Kidepo NP, where there is no surface supply available all year round - as the rivers are seasonal - bore holes are used, although these also sometimes run dry, and utilize a reservoir tank to provide a back-up supply.

²³ MTWA, Uganda tourism development master plan 2014-24

Furthermore, mobile companies, who are driven primarily by competition and profit, usually go where revenue is expected to be high. As a result many areas, particularly in National Parks (such as Kipedo National Park) and remote areas such as in Kalangala islands have inadequate ICT network²⁴. Business owners in these areas face very high ICT costs and those in tourism business are unable to provide ICT services to their clients. With limited and unreliable internet connectivity, tourism establishments are constrained in adopting e-business technologies and they are unable to efficiently market themselves and adequately respond to online tourist inquiries

Alternatives

MoWT, MWE, MEMD and MICT must prioritise construction of tourism roads and other alternative transport means, piped water supply, reliable electricity and ICT services in National Parks respectively as recommended in the NDPIII. This is because the return on investments in the tourism sector is very visible.

Support the private sector to provide low-cost accommodation facilities in protected areas²⁵. Appreciating the challenges of investing in protected areas the MFPED and MWTA should provide incentives to attract investment in the protected areas. This will increase on the number and quality of accommodation in protected areas hence improving tourists' experiences.

5. Inadequate and substandard Skills and manpower: The tourism industry is short of well trained personnel, most of the people operating in the industry in are not trained in tourism and hospitality which reduces the quality of services provided.

The country boasts of only two government tourism related training institutes that are almost non-operational due to low staff levels and shortage of training materials hence producing less than 200 graduates annually. This has

²⁴ ibid

²⁵ NPA, NDPIII, 2020.

encouraged tourism operators to hire expatriates from Kenya and other countries which reduces opportunities for employment and career advancement of Ugandans. This shortage of skilled workers also discourages investment in tourism since imported labor is usually expensive.

Alternatives

Training and skilling tourism manpower. This should be done by first reviving the two tourism and wildlife government training institutes, restructure and recruit staff, construct and provide training facilities and equipment and revise the curriculum to provide tailor made courses that are relevant to the changing tourism demands. There is also need for fresher courses for most of the tourism practitioners in order to improve on the quality of services offered to clients.

Government should offer incentives to private investors offering tourism related courses and encourage the private sector to provide tourism knowledge and skills through internship and apprenticeship programmes. This will increase access to tourism training and increase number and quality of tourism professionals.

6. Land ownership of tourism sites by individuals. Several tourism sites are still under private ownership which makes their development and collection of Non Tax Revenue from them difficult. Furthermore there reports of people encroaching and getting land titles on protected areas for example in Kaiso- Tonya Wildlife Area,²⁶ this creates risks to the conservation of the protected flora and fauna in the protected area.

Alternative

MTWA must ensure that all protected areas and tourism sites owned by Government get land titles to protect them from encroachment and destruction.

²⁶ UWA, Issuing land titles in kaiso- Tonya community wildlife Area, 2022.