



**Durham**  
University

Centre for Sustainable  
Development Law and Policy

Policy Brief

# **Integrating Oil & Gas into Uganda's NDC 3.0 and Developing an Energy Transition Plan and Implementation Framework**



## Executive Summary



Uganda is preparing its NDC 3.0 at a pivotal moment as the country approaches the commencement of commercial oil production. Although national emissions have increased since 1995, Uganda's per capita emissions remain well below the global average. Current NDC plans do not treat oil and gas as a dedicated sector, which complicates target-setting, MRV, and sector accountability. At the same time, the development of NDC 3.0 must align with Uganda's long-term strategies, Vision 2040, the LT-LEDS, and national development cycles.

Building on our previous, long-standing collaboration, the Centre for Sustainable Development Law & Policy (CSDLP) led a high-level two-day workshop involving the Ministry of Water and Environment, the Ministry of Energy and Mineral Development, the Petroleum Authority of Uganda, and the Uganda National Oil Company to discuss global best practices based on an analysis of countries' NDC 3.0 and oil & gas transition frameworks that were selected in preparatory online meetings. During the workshop, and based on various presentations, key challenges and next steps were identified. Challenges include the absence of sector-specific MRV, unclear baselines, major data gaps, limited inter-agency coordination, and clarity on how to implement Uganda's Energy Transition Plan aspects of the oil and gas sector.



The workshop produced a set of actionable outcomes. The participants agreed to include oil and gas explicitly in NDC 3.0; creation of an Energy Sector MRV framework; requirement of emission-reduction strategies from oil and gas companies at the exploration and production stages; development of lead agency climate action plans; and strengthening inter-agency coordination between the relevant government agencies. Opportunities include reinvesting oil & gas revenues into renewable energy projects and promoting climate resilient efforts, building MRV capacity in a manner that improves oversight and quality of data, attracting long-term finance in a legally transparent environment, and improving the quality of the national GHG inventory. Taken together, Uganda can deliver an NDC 3.0 that is credible, ambitious and aligned with the Paris Agreement.

## 1. Background



This policy brief builds on a two-day workshop held on the 26-27 February 2026 in Kampala, Uganda covering:

1. Global Lessons on NDCs and Oil & Gas
2. Global Best Practices in Oil & Gas Transition Frameworks

Uganda's collaboration with CSDLP dates to COP26 in 2021 and includes contributions to climate regulations, the national petroleum policy, the LT-LEDS, and climate strategies for the energy, minerals, and petroleum sectors. Uganda participates in official UNFCCC negotiation processes and side events including the latest at COP29 and COP30 with senior government representation.

The workshop's objective was to support Uganda in determining how oil and gas should feature in its NDC 3.0, especially considering that production is yet to commence and baseline selection remains a challenge.

## 2. Global Analysis of NDCs and Oil & Gas



### 2.1 European Union

The EU targets a 66.25–72.5% GHG reduction by 2035 compared to 1990. Coal's share of electricity production reached its lowest levels in 2024; solar power surpassed coal for the first time. The EU is committed to a fossil-free power system ahead of 2050 and methane reduction targets through the EU Methane Regulation.

### 2.2 United Kingdom

The UK targets an 81% emissions reduction by 2035 and has phased out coal power entirely as of 2024. The UK is considering a moratorium on new oil and gas licences and emphasises just transition through national bodies like Skills England and international alliances such as the Powering Past Coal Alliance.

### 2.3 Norway

Norway's NDC does not explicitly reference oil or methane, but the country commits to a 70–75% emissions reduction by 2035. Norway relies heavily on domestic measures alongside cooperation with the EU, with strong institutional frameworks for reporting and climate policy implementation.

### 2.4 Angola

Angola presents unconditional and conditional targets for 2035 based on realistic implementation constraints. Oil and gas mitigation includes reducing fugitive emissions and expanding renewable energy. Financing needs exceed USD 412 billion, with most financing dependent on international support. The GST is referenced in setting new baselines.

### 2.5 Kenya

Kenya targets 75 MtCO<sub>2</sub>e reductions by 2035, with 80% conditional on international support. Kenya's NDC recognises the development-versus-environment dilemma posed by large untapped oil and coal reserves. The country aims for 100% renewable electricity by 2035.

### 2.6 Mozambique

Its provisional NDC emphasises adaptation as a priority. Mitigation targets remain under development. Mozambique aligns its NDC with the LT-LEDS and explicitly references GST outcomes.

### 2.7 China

China commits to a 7–10% reduction in net GHG emissions by 2035 from peak levels. The NDC includes limiting fossil fuel consumption, upgrading coal power plants, methane control, and sector-wide emissions reductions. China's commitments are explicitly aligned with GST findings and long-term Paris goals.

### 2.8 Nigeria

Nigeria commits to reducing greenhouse gas emissions by 29% by 2030 and 32% by 2035 compared to 2018 levels, moving toward achieving net-zero emissions by 2060. These targets are underpinned by expanded sectoral coverage, strengthened climate governance, and robust implementation frameworks that ensure both environmental integrity and socio-economic advancement.



## 3. Summary of Uganda Workshop Discussions



### 3.1 Baselines and Data Needs

Key issues include:

- selection of a baseline year and factors to take into account in its selection
- determining baselines for oil and gas before production begins,
- weaknesses in tracking project impacts, such as clean cooking and solar initiatives,
- insufficient data for accurate GHG inventories,
- and the need for sector-specific MRV systems.

### 3.2 Institutional Gaps

Challenges include:

- communication lapses between ministries and agencies,
- lack of sector climate action plans (required by law),
- improving information sharing and inter-agency coordination,
- and the need for capacity building in MRV, emissions quantification, and implementation.

### 3.3 Defining Transition

There is an ongoing debate on what “just transition” means in Uganda’s context. While Uganda must align with the Paris Agreement, national development goals and energy security remain central. Uganda’s transition must reflect where the country is today—pre-production—and anticipate future changes once production begins.

## 4. Agreed Workshop Outcomes



### 4.1 Oil & gas will be explicitly included in NDC 3.0.

Both GHG and non-GHG mitigation measures will be listed.

### 4.2 An MRV Framework for the Energy Sector will be developed.

This will include oil and gas as a central component.

### 4.3 Oil & Gas producers will require emission-reduction strategies.

Guidelines for operators will be developed by the relevant government agencies.

### 4.4 Lead agencies will create climate action plans.

These must include adaptation, mitigation, capacity needs, and costs.

### 4.5 Inter-agency coordination will be strengthened.

Including establishment of an Oil & Gas Working Group.

### 4.6 Capacity building needs were identified across all institutions.

Particularly in MRV, data for developing a national GHG inventory, emissions accounting, and verification.

### 4.7 Alignment with national planning cycles (NDP) was affirmed.

NDC and ETP reviews will follow the national development plan timeline.



## 5. Policy Recommendations



### 5.1 Establish Oil & Gas as a Distinct Sector in NDC 3.0

- Set sector-specific mitigation measures
- Align with LT-LEDS trajectories
- Choose a baseline year that reflects Uganda's economic realities and historical emissions contributions

### 5.2 Develop a Comprehensive Sector MRV Framework

- Facility-level monitoring
- Integration into national GHG inventory
- Data sharing protocols between agencies and operators

### 5.3 Require Emission Reduction Plans at Licensing

- Methane management
- Flaring/venting elimination from normal operations
- CCUS feasibility assessment

### 5.4 Develop Mandatory Climate Action Plans for Each Lead Agency

- Assessment of emissions
- Adaptation strategies
- Capacity needs
- Financing strategy

### 5.5 Strengthen Inter-Agency Coordination

- Operationalise the Oil & Gas Working Group
- Create regular reporting structures
- Harmonise data protocols

### 5.6 Enhance Climate Finance Mobilisation

- Use oil revenues to fund investment in renewables and clean energy projects
- Explore Article 6 carbon markets
- Leverage bilateral and multilateral support

### 5.7 Review and Update the Energy Transition Plan

- Synchronise with NDCs
- Include realistic timelines for oil and gas decline scenarios
- Integrate low-carbon technologies and resilience measures

## 6. Conclusion



CSDLP offers targeted, research-based solutions for transition planning, climate policy, NDCs and LT-LEDS, as well as consultancy services and the facilitation of workshops with tangible outcomes. We can produce policy briefs, implementation plans, and research-informed reports on specific issues.

Uganda stands at a critical moment. Decisions made now will shape the country's emissions trajectory, economic development, and alignment with the Paris Agreement. The workshop outcomes—explicitly including oil and gas in NDC 3.0, establishing an MRV system, improving institutional capacity, and enhancing coordination—provide a strong foundation for a credible, implementable NDC. With the right policies, Uganda can pursue a **just, orderly, and development-focused transition** while responsibly managing its emerging oil sector.

### Authorship & Acknowledgements

This policy brief was prepared by **Professor Petra Minnerop, Professor of International Law, Durham Law School**, and **Dr Adebola Adeyemi, Assistant Professor, Durham Law School**.

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For more information on how our Centre can support your climate action efforts, please contact our Senior Business Development Manager, Kate Morris, at [kathryn.l.morris@durham.ac.uk](mailto:kathryn.l.morris@durham.ac.uk).

### Abbreviations and Acronyms

#### CSDLP

Centre for Sustainable Development Law and Policy

#### COP

Conference of the Parties to the United Nations Framework Convention on Climate Change

#### CCUS

Carbon Capture, Utilisation and Storage

#### ETP

Energy Transition Plan

#### GHG

Greenhouse Gas

#### GST

Global Stocktake

#### LT-LEDS

Long-Term Low Emissions Development Strategy

#### MRV

Monitoring, Reporting and Verification

#### MtCO<sub>2</sub>e

Million tonnes of carbon dioxide equivalent

#### NDC

Nationally Determined Contribution

#### NDC 3.0

Third Generation of Nationally Determined Contributions under the Paris Agreement

#### NDP

National Development Plan

#### UNFCCC

United Nations Framework Convention on Climate Change