Office of the Auditor General

THE REPUBLIC OF UGANDA



OFFICE OF THE AUDITOR GENERAL

Value for Money Audit on the Monitoring and Enforcement of Noise Pollution Standards by the National Environment Management Authority (NEMA) and Selected Cities

December 2025

THE REPUBLIC OF UGANDA



VALUE FOR MONEY AUDIT ON THE MONITORING AND ENFORCEMENT OF NOISE POLLUTION STANDARDS BY NEMA AND SELECTED CITIES

REPORT OF THE AUDITOR GENERAL

DECEMBER 2025

AUDITOR GENERAL'S MESSAGE

15th December, 2025

The Rt. Hon. Speaker of Parliament
Parliament of Uganda
Kampala

VALUE FOR MONEY AUDIT ON THE MONITORING AND ENFORCEMENT OF NOISE POLLUTION STANDARDS BY THE NATIONAL ENVIRONMENT MANAGEMENT AUTHORITY (NEMA) AND SELECTED CITIES

In accordance with Article 163(3) of the 1995 Constitution of the Republic of Uganda, I hereby submit my audit report on the Value for Money Audit on the Monitoring and Enforcement of Noise Pollution Standards by the National Environment Management Authority (NEMA) and Selected cities.

My office intends to carry out a follow-up at an appropriate time regarding actions taken in relation to the recommendations in this report.

I would like to thank the staff of the National Environment Management Authority (NEMA) and the cities of Kampala, Jinja, Soroti, Lira, Fort Portal, Hoima, Mbarara and Masaka for the assistance offered to my staff during the period of the audit.



Edward Akol
AUDITOR GENERAL

15th December, 2025

TABLE OF CONTENTS

AUDITOR GENERAL'S MESSAGE i
LIST OF TABLES iv
LIST OF FIGURES v
LIST OF ACRONYMS vi
EXECUTIVE SUMMARY vii
CHAPTER ONE 1
1.0 INTRODUCTION 1
1.1 Background 1
1.2 Motivation 1
1.3 Description of the audit area 2
1.4 Mandate, Policy and Legal framework 3
1.5 Organisational structure 4
1.6 Funding for activities 4
CHAPTER TWO 6
2.0 AUDIT DESIGN AND METHODOLOGY 6
2.1 Audit objectives and questions 6
2.2 Audit scope 6
2.3 Data collection and analysis 6
CHAPTER THREE 9
3.0 SYSTEMS AND PROCESS DESCRIPTIONS 9
3.1 Roles and responsibilities of key players 9
3.2 Process description 9
CHAPTER FOUR 14
4.0 FINDINGS, CONCLUSIONS AND RECOMMENDATIONS 14
4.1 Identification and prioritisation of noise pollution hotspots and sensitive receptors 14
4.2 Tracking of complaints and actions taken 16
4.3 Staffing, capacity building and availability of appropriate equipment 21
4.4 Enforcement of noise pollution standards 29
4.5 Sensitisation and compliance assistance on noise pollution 33
4.6 Coordination between stakeholders on monitoring and enforcement of noise pollution standards 37
APPENDICES 41
Appendix I: Organisational Structure 41
Appendix II: Documents reviewed 43
Appendix III: Persons interviewed 44

Appendix IV: Roles and responsibilities of key players in monitoring and enforcement of noise pollution 45
Appendix V: Action taken on complaints recorded by NEMA and the cities 46
Appendix VI: Instances of Uncoordinated Enforcement Actions by NEMA and KCCA 49

LIST OF TABLES

Table 1: Maximum Permissible Noise Levels in Uganda 4

Table 2: Budgetary allocations and releases for noise pollution monitoring and enforcement (UGX. Bn) 4

Table 3: Data collection and analysis methods 7

Table 4: Stakeholder mapping for players in the monitoring and enforcement of noise pollution 9

Table 5: Roles, frequency and expected outputs from stakeholder coordination 13

Table 6: Action taken on complaints received by NEMA and Cities.....18

Table 7: Complainant satisfaction with NEMA and City response to noise complaints 20

Table 8: Staff assigned to support noise pollution monitoring and enforcement under NEMA 21

Table 9: Staffing gaps in the selected cities.....22

Table 10: Number of trained NEMA and City staff in noise pollution 24

Table 11: Observed variances in measurement and enforcement of noise pollution by different officers 24

Table 12: Total number vs. operational sound meters at NEMA and Cities 26

Table 13: Number of noise meters required per regional office / city.....26

Table 14: Differences in enforcement actions taken by officials in different entities 30

Table 15: Sensitisation on noise pollution via different channels 33

Table 16: Compliance assistance and knowledge gaps among facility owners interviewed..36

LIST OF FIGURES

Figure 1: Steps for handling noise pollution complaints from receipt to closure 10
Figure 2: Average number of complaints reported per month per channel in the selected cities 17
Figure 3: Sources of recorded noise complaints reported to NEMA 18
Figure 4: Coverage of NEMA Regional Offices 22
Figure 5: Sound level meter with and without windscreen 27

LIST OF ACRONYMS

Acronym	Meaning
Bn	Billion
dB	Decibels
dB(A)	Decibel A-weighted
dB(C)	Decibel C-weighted
eDOC	Electronic Documentation System
ELMIS	Environment Licensing and Management Information System
FY	Financial Year
INTOSAI	International Organisation of Supreme AuditInstitutions
KCCA	Kampala Capital City Authority
LGs	Local Governments
MDAs	Ministries, Departments and Agencies
Mn	Million
NEA	National Environment Act
NEMA	National Environment Management Authority
OAG	Office of the Auditor General
SDG	Sustainable Development Goals
SOP	Standard Operating Procedures
UGX	Ugandan Shillings
UPDF	Uganda Peoples' Defence Forces
UPF	Uganda Police Force and
USMID	Uganda Support to Municipal Infrastructure Development Programme
VFM	Value for money

EXECUTIVE SUMMARY

Noise pollution is defined as the release of uncontrolled, excessive sound that disrupts Human Health and Environmental Equality and is an emerging public health and environmental issue in Uganda's urban areas. The National Environment Management Authority (NEMA), and the Local Governments are responsible for regulating noise levels in accordance with the National Environment Act, Cap 181, and the National Environment (Noise Standards and Control) regulations 2003. However, there has been persistent public outcry and complaints of unchecked noise levels, particularly in all the major cities and urban areas.

The Office of the Auditor General undertook a Value for Money (VFM) audit to assess the effectiveness of NEMA and selected cities in monitoring and enforcing noise pollution standards with the objective of ascertaining the challenges in regulating noise pollution and providing recommendations to address these challenges.

Below is a summary of the key findings and recommendations from the audit. The detailed findings are in chapter four of this report.

KEY FINDINGS

The audit noted areas of commendable performance for instance: NEMA had conducted joint inspections with city authorities and the Environmental Protection Force (EPF) during the period under review. NEMA is also in the process of revising the noise pollution regulations and acquired sound level meters to aid monitoring.

Despite these efforts, significant challenges remained, with noise levels above permissible levels in 28 out of 29 facilities visited. 91% of complaints registered with NEMA were due to excess noise from places of entertainment (59%) and places of worship (32%).

Audit identified the following performance gaps that are undermining the effectiveness of efforts by NEMA and the selected cities to monitor and enforce noise regulations across the country;

1. There are no formal risk-based assessment procedures to identify and prioritize hotspots or sensitive receptors like schools, hospitals, residential areas. NEMA and selected cities mainly responded to noise complaints reactively. As a result, monitoring and enforcement efforts were not systematically targeted to areas of highest risk, limiting effectiveness of regulatory interventions.

2. NEMA and the selected cities do not systematically and comprehensively capture and track noise complaints. Specifically, complaints received through walk-ins and calls were undocumented while only 10.8% and 46% of the complaints received in writing were investigated and resolved by NEMA and the respective Cities.

3. Staffing inadequacies is one of the main challenges affecting the monitoring of noise standards. There were only 23 technical staff in NEMA, and 17 staff for the eight (8 cities) selected to execute the enormous mandate. Moreover, even these do not prioritise noise as there are other competing environment responsibilities and cover wide geographical areas resulting in irregular inspections and delays in handling noise-related cases.

4. There was insufficient equipment for noise monitoring and enforcement with only 17 operational sound level meters for both NEMA and selected cities (NEMA: 9, cities: 8). In addition, only one facility[1] out of the 29 visited had installed sound-level measuring equipment, contrary to the legal requirement[2]. This was because none of the city councils made installation a condition for approval of occupation. Additionally, the equipment are all not regularly calibrated to enable the collection of reliable, credible, and admissible evidence on noise levels and trends for decision making and enforcement.

5. Furthermore, capacity building for city environmental officers on noise pollution was limited. Only one officer (from Masaka) attended NEMA's Environmental Inspector training during the review period, and the training did not cover practical aspects of noise measurement or corrective action. Consequently, officers demonstrated inconsistencies (and at times contradictions) in their monitoring and enforcement actions.

6. Enforcement actions undertaken by NEMA and the selected cities are inconsistent, not evidence-based, and often do not result in significant reduction of repeat violations due to the absence of structured escalation or tracking system, enabling chronic violators to resume operations with impunity and leaving noise pollution essentially unregulated despite statutory mandates. Of the 16 facilities inspected in Kampala, Jinja, Soroti, Lira, and Hoima, each previously subjected to enforcement actions such as verbal warnings, improvement notices, or equipment impoundment, 15 (94%) were still found to be violating noise pollution standards.

7. Only NEMA and KCCA publicised dedicated helplines for reporting noise complaints on their websites or social media platforms. There is no structured sensitisation efforts in the rest of the selected cities. Throughout the review period, only NEMA, KCCA and Lira conducted compliance-assistance engagements (one each) for polluters; otherwise, engagement was largely limited to punitive enforcement.

8. Coordination among stakeholders is weak, with roles sometimes mixed up and conflicting priorities between revenue collection and environmental compliance.

KEY AUDIT RECOMMENDATIONS

NEMA and the cities should;

1. Develop a comprehensive, data-driven system to map noise hotspots and sensitive receptors, and to flag and prioritise high-risk cases.

2. Fast track the completion and roll out of the Environment Licensing and Management Information System (ELMIS) complaint module and ensure that it captures all complaints regardless of channel (phone, walk-in, social media, etc.), tracks every stage from receipt to closure, flagging repeat offenders, among others.

3. Develop, disseminate and enforce Standard Operating Procedures to guide in recording, prioritizing, investigating, and providing feedback on noise complaints with clear enforcement timelines ensuring that responses are prompt and consistent.

[1] La Gatos

[2] Regulation 8(2) of the National Environment (Noise Standards and Control) Regulations, 2003.

4. In consultation with the Ministry of Public Service, prioritize recruitment and deployment of more dedicated officers for noise monitoring and enforcement, and provide facilitation for after-hours operations.

5. Ensure enforcement actions are evidence based and all enforcement actions undertaken are documented to ease follow up.

6. Develop and implement a targeted communication strategy on noise pollution that integrates clear, accessible messages into all sensitisation channels to raise public awareness of permissible noise levels, reporting procedures, and enforcement actions. This strategy should also strengthen compliance assistance through structured, ongoing engagement with noise polluters to promote adherence to regulations.

7. Strengthen inter-agency coordination by clarifying institutional roles and obligations in the monitoring and enforcement of noise pollution standards.

OVERALL AUDIT CONCLUSION

While some progress has been made in monitoring and enforcement of noise pollution standard by NEMA and selected cities, the efforts remain largely reactive, under resourced and poorly coordinated. The absence of structured systems for identifying and prioritising noise hotspots, tracking complaints, and enforcing standards, combined with inadequate staffing, limited public awareness and weak stakeholder coordination, undermines the effectiveness of the current interventions. As a result, the systems in place are not yet sufficient to achieve sustained reductions in repeat violations or adequately address community complaints.



Edward Akol
AUDITOR GENERAL
KAMPALA

15th December, 2025

CHAPTER ONE

1.0 INTRODUCTION

1.1 Background

Noise means any unwanted and annoying sound that is intrinsically objectionable to human beings[3]. Noise pollution refers to the release of uncontrolled noise that is likely to cause danger to human health, or damage to the environment[4]. Noise is measured in decibels (dB) which refers to a dimensionless unit used in comparison of the magnitude of sound pressure or power[5].

The National Environment Act (NEA) Cap.181 requires NEMA to put in place standards for the control of effects of vibration and pollution caused by noise. Consequently, NEMA has set specific regulations detailing the permissible noise levels with varying limits for residential, mixed residential, hospitals, schools, industrial areas, and other sensitive zones[6].

The directorate of Environment Monitoring and Compliance under NEMA is tasked with environmental monitoring and ensuring that the regulated community complies with environmental standards and regulations and contributes to attainment of one of the Authority's strategic themes, which is to promote "A Clean, Healthy and Productive Environment contributing to Social-Economic Transformation in Uganda"[7].

1.2 Motivation

Article 39 of the 1995 Constitution of the Republic of Uganda states that, "every Ugandan has a right to a clean and healthy environment"[8]. However, this right is threatened when one suffers prolonged exposure to excessive noise which can diminish quality of life, lower productivity, and cause hearing impairment.

A review of social and traditional media[9] between 2020 and 2024 revealed over 3,500 posts and commentaries expressing frustration over worsening noise levels. Many described the noise as "unbearable," depriving them of sleep and indicating that the existing laws were not being enforced.[10]

In response to the significant public outcry, the responsible government agencies including NEMA and city authorities gradually stepped-up monitoring and enforcement

[3] The National Environment (Noise Standards and Control) regulations 2003.
[4] Ibid.
[5] Ibid.
[6] Schedule 1; Maximum Permissible Noise Levels for General Environment, the national Environment (Noise Standards and Control) regulations 2003.
[7] NEMA strategic plan 2021/22-2024/25
[8] Article 39 of the Constitution of the Republic of Uganda 1995 (as amended),
[9] Public complaints and social media reactions were drawn from posts and comments on X (Twitter), Facebook, Instagram, and local media reports (e.g. The Observer, Daily Monitor).
[10] https://www.independent.co.ug/churches-bars-on-the-spot-over-noise-pollution-in-lira-city/; *The East African, 2022.* As cited by https://noisenewsinternational.net/noise-and-vibration-regulations-for-uganda-with-consideration-for-people-and-the-environment/

actions, particularly through joint police operations, equipment seizures, arrests, and fines in 2022 and 2023[11][12].

Nonetheless, noise pollution remained a matter of concern and continued to feature in media and official reports through 2024,[13,14,15] with residents in cities such as Kampala and Mbarara reporting persistent disturbances and limited or slow response from the authorities[16]. Media reports even documented cases where residents complained to KCCA and NEMA without receiving relief.[17]

Moreover, the National State of the Environment Report (2024) highlighted challenges to monitoring and enforcement, including inadequate noise monitoring and equipment, and poor coordination and low public awareness[18]. The report further highlights the fact that the current state of noise pollution in Uganda is characterised by elevated noise levels, particularly in urban areas and this continuous rise in noise levels is evident in cities and towns, where background noise from traffic, construction, industrial activities, and entertainment venues is pervasive.[19]

The above issues present a risk that government may fail to achieve the national strategic objective of enhancing productivity and social well-being of the population[20], given the negative impacts noise pollution has on human health.

In light of the aforementioned concerns, the Office of the Auditor General conducted a Value for Money audit to evaluate the effectiveness of NEMA and selected cities in monitoring and enforcement of noise pollution standards.

1.3 Description of the audit area

The responsibility of monitoring and enforcement of noise pollution standards in Uganda is coordinated by the National Environment Management Authority (NEMA), through its departments of environment, enforcement and field operations, department of environmental compliance and the department of environmental planning and coordination (division of education and advocacy).

The Authority is a semi-autonomous institution, established in 1995, as the principal entity responsible for coordinating, monitoring, regulating and supervising environmental management in the country. The Authority spearheads the development of environmental policies, laws, regulations, standards and guidelines, with the aim of ensuring sustainable

[11] https://www.independent.co.ug/kcca-threatens-to-close-down-places-of-worship-and-entertainment-responsible-for-noise-pollution/
[12] https://upf.go.ug/27-more-days-countdown-towards-stricter-enforcement-of-laws-and-regulations-on-littering-and-noise-pollution/ ;
[13] https://nilepost.co.ug/news/222518/kampala-authorities-launch-operation-to-curb-noise-and-vibration-pollution?utm
[14] https://www.monitor.co.ug/uganda/oped/editorial/rid-urban-residential-areas-of-noise-pollution-4818164?utm
[15] https://www.nema.go.ug/en/wp-content/uploads/2025/10/National-Status-of-the-Environment-Report-NSOER-2024.pdf?utm
[16] https://www.monitor.co.ug/uganda/news/national/mbarara-s-deafening-noise-hurting-residents-4829988
[17] https://observer.ug/news/kololo-residents-complain-about-noise-pollution-in-vain/
[18] National State of the Environment Report 2024 and NEMA Annual National Lead Agency Environment Management report 2019/20
[19] National State of the Environment Report 2024
[20] NDP III

development in accordance country's vision, as well as aligning to regional and global commitments such as the Sustainable Development Goals (SDGs) 3 and 21.

The departments within NEMA collaborate with environment officers in the local governments to monitor and enforce compliance with the noise pollution standards across the country. The main sources of noise pollution include night clubs, bars, discotheques, lounges, churches, among others[22].

Noise levels are measured using the sound meter, and the standard unit of measurement is the decibel (dB), typically expressed as dB(A)[23] to reflect the sensitivity of the human ear to different frequencies.

1.4 Mandate, Policy and Legal framework

The mandate of NEMA and the city authorities to monitor and enforce noise pollution standards is derived from Article 39 of the 1995 Constitution of the Republic of Uganda (as amended) which guarantees the right of every Ugandan to a clean and healthy environment.

This mandate is further amplified by sections 9(2) and 11 of the National Environment Act (NEA) Cap.181 which require both NEMA and the city authorities respectively to ensure that any activity undertaken within their jurisdiction are in compliance with the Act. Furthermore, section 106 (1) of the NEA Cap.181 requires NEMA, in consultation with lead agencies, to establish criteria for measurement of noise pollution, describe minimum standards, issue guidelines to abate noise and take measurement of noise levels.

Additionally, the owners of facilities or establishments are required under Regulation 8(2) of the National Environment (Noise Standards and Control) Regulations, 2003, to install at their premises sound level meters for the measurement and monitoring of sound from the establishment, to ensure that the noise emitted does not exceed the permissible noise levels.

Regulation 6 of the National Environment (Noise Standards and Control) regulations, 2003 sets the maximum allowable noise levels for different sources and environments in Uganda. These regulations also establish specific decibel (dB) limits for various settings, including residential areas, commercial zones, factories, construction sites, entertainment venues, places of worship among others. Below is an extract of the limits as provided in the regulations.

[21] https://www.nema.go.ug/new_site/
[22] Source: NEMA Q4 report, FY 2023/24
[23] It is a unit of sound measurement that reflects the relative loudness perceived by the human ear. DB(A) is a metric for assessing environmental noise and its impact on people.

Table 1: Maximum Permissible Noise Levels in Uganda

Category	Location / Facility/ Zone	Day Limit (decibels A) 6:00 a.m. - 10:00 p.m.	Night Limit (decibels A) 10:00 p.m. - 6:00 a.m.
General Environment	Any building used as hospital, convalescence home, home of aged, sanatorium and institutes of higher learning, conference rooms, public library, environment or recreational sites.	45	35
	Residential buildings	50	35
	Mixed Residential/ Commercial	55	45
	Residential + Industrial/ Small- Scale Commerce	60	50
	Industrial Areas	70	60
Construction sites	Residential	60	40
	Commercial	75	50
	Industrial	85	65
Entertainment places	Residential	60	40
	Commercial	75	50
	Industrial	85	65
Places of worship	Residential	60	40
	Commercial	75	50
	Industrial	85	65

***Source**: National Environment (Noise Standards and Control) Regulations, 2003*

1.5 Organisational structure

The organisational structure for NEMA's departments involved in the monitoring and enforcement of noise pollution have been attached in **Appendix I.**

1.6 Funding for activities

Over the last three (3) financial years, the Department of Environment Enforcement and Field Operations received UGX.5.804Bn against an approved budget of UGX.6.338Bn for monitoring and enforcement activities. However, this was not disaggregated to specify how much was for noise pollution alone. Of the total released, only UGX.0.12Bn (2.1%) was spent on monitoring and enforcement of noise pollution standards as shown in the table below;

Table 2: Budgetary allocations and releases for noise pollution monitoring and enforcement (UGX. Bn)

FY	Approved Department Budget	Released amount to the Department	Amount Spent on noise monitoring and enforcement	% of released amount spent noise monitoring and enforcement
2022/23	1.933	1.748	0.03	1.7
2023/24	2.725	2.376	0.019	0.8
2024/25	1.68	1.68	0.071	4.2
Total	**6.338**	**5.804**	**0.12**	**2.1**

***Source**: OAG review of the NEMA budget data and payment files for FYs 2022/23, 2023/24 and 2024/25.*

A review of the payment files revealed that the funds were used on operations related to monitoring, inspection, and complaint-response and enforcement activities (e.g.

impounding of equipment) on noise pollution across multiple districts and cities, including Kampala, Gulu, Mubende, Masindi, Hoima, Rakai, Kagadi, Kyenjojo, Kabarole, and Kamwenge.

CHAPTER TWO

2.0 AUDIT DESIGN AND METHODOLOGY

The audit was conducted in accordance with the International Organisation of Supreme Audit Institutions (INTOSAI) Performance Auditing Standards and the Performance Auditing guidelines prescribed in the Office of the Auditor General (OAG) Value for Money (VFM) audit manual. The standards require that the audit be planned in a manner that ensures that an audit of high quality is carried out in an economic, efficient, effective and timely manner.

2.1 Audit objectives and questions

2.1.1 Audit Objective

To assess whether NEMA and the selected cities have established and implemented a system to monitor, report, and enforce noise pollution standards that leads to sustained reductions in repeat violations and community complaints.

2.1.2 Audit Questions

To achieve the above audit objective, the audit sought to answer the following questions;

i. Do the monitoring systems put in place by NEMA, and the selected cities enable identification and coverage of noise pollution hotspots and sensitive receptors?
ii. To what extent do the mechanisms put in place by NEMA and the selected cities enable them to capture and track action taken on all noise-related complaints, right from reporting to follow-up and closure?
iii. To what extent do available resources (staff, equipment, skills) enable collection of reliable evidence on noise levels and trends for decision-making and reporting?
iv. Are enforcement actions timely, evidence-based, and effective at reducing repeat violations and time taken to comply?
v. To what extent have NEMA and the selected cities implemented sensitisation and compliance assistance interventions targeted at reducing noise pollution?
vi. To what extent do the coordination arrangements between NEMA and key stakeholders facilitate monitoring and enforcement of noise pollution standards?

2.2 Audit scope

The audit examined the measures implemented by NEMA and eight (8) selected city authorities to monitor and enforce noise pollution standards. It focused on outdoor noise and noise monitoring, and enforcement activities by NEMA, and selected city authorities over a three-year period (FYs 2022/23, 2023/24 and 2024/25). The selected cities were Kampala, Jinja, Soroti, Lira, Fort Portal, Hoima, Mbarara and Masaka.

2.3 Data collection and analysis

The audit used a combination of interviews, document review, physical observation and inspections to collect data to answer the audit questions and provide data for analysis to arrive at the findings, conclusions and recommendations. The details are provided in the

table below. The list and purpose for interviews conducted and documents reviewed are attached as **Appendices II and III** respectively.

Table 3: Data collection and analysis methods

No	Audit Question	Data Collection Methods	Data analysis
1	Do the monitoring systems put in place by NEMA and the selected cities enable identification and coverage of noise pollution hotspots and sensitive receptors?	To address this audit question, the audit reviewed noise monitoring reports submitted to NEMA by the selected cities, noise complaints logs, monitoring work plans and reports and interviewed officials from NEMA, selected cities and Environment Inspectors.	We analysed the interview responses and extracts from documents reviewed to determine how comprehensively existing practices enabled identification and prioritisation of noise hotspots and sensitive receptors, compared to best practice.
2	To what extent do the mechanisms put in place by NEMA and the selected cities enable them to capture and track action taken on all noise-related complaints, right from reporting to follow-up and closure?	The audit team reviewed the National Environment (Noise Standards and Control) Regulations 2003 and interviewed NEMA and city staff to document the processes undertaken by NEMA and the selected cities to verify and respond to complaints received relating to noise pollution. The team conducted observations / walkthroughs to verify how complaints were logged and tracked in real-time. The team also interviewed complainants to establish how they engage with NEMA and the City authorities.	We compared the expected process for complaint-handling (from receipt to closure) to the actual practice by NEMA and the selected cities.
3	To what extent do available resources (staff, equipment, skills) enable collection of reliable evidence on noise levels and trends for decision-making and reporting?	The audit reviewed relevant documents including organizational Structures, HR records staffing, training reports, among others but also interviewed officers from Human Resource department to assess number of staff qualified/trained to monitor and enforce noise pollution standards. The team conducted physical inspection to confirm existence and functionality of the sound level metres at NEMA and selected cities.	The team compared required staffing levels with actual and computed the ratio of NEMA regional staff to the number of districts served. Expected competencies were compared with content of trainings received and observed field measurement practices. Inventories were reviewed for date of acquisition of noise meters and expected calibration frequency compared with actual.
4	Are enforcement actions timely, evidence-based, and effective at reducing repeat violations and time taken to comply?	The audit reviewed monitoring reports, enforcement reports, noise complaints, onsite inspection reports, compliance notices and existing regulations and policies, interviewed enforcement teams to assess the enforcement	Actual enforcement patterns in reports, records and field inspections were compared with the expected practice of timely, documented, evidence-based escalation.

No	Audit Question	Data Collection Methods	Data analysis
		mechanisms/activities undertaken for the period under review in the selected cities. The team also participated in joint inspections with NEMA and city environment officers to verify compliance of the regulated community with noise standards.	
5	To what extent have NEMA and the selected cities implemented sensitisation and compliance assistance interventions targeted at reducing noise pollution?	The audit reviewed NEMA's strategic Plans and annual work plans with specific interventions on noise, records of sensitisation campaigns**,** awareness workshops, and public engagement meetings. The strategic plans and operational work plans of the selected City Authorities were also reviewed to identify compliance assistance efforts to assess whether there is noted improvement in compliance as result of the compliance assistance interventions implemented by NEMA and selected city authorities. The audit interviewed the noise polluters, NEMA and selected city officials to assess whether the compliance assistance interventions are actually helping to reduce noise pollution.	Planned awareness and advisory support expected under good practice was compared with actual interactions with the general public and the regulated facilities shown in reports and interviews.
6	To what extent do the coordination arrangements between NEMA and key stakeholders facilitate monitoring and enforcement of noise pollution standards?	The team reviewed the minutes of joint meetings and interviewed NEMA and selected city environmental officers to evaluate and confirm if there is coordination during the monitoring and enforcement of noise pollution and also ascertain the frequency of these meetings. The team observed how NEMA/Cities and Police coordinate during the monitoring and inspection of noise pollution in selected cities.	Content analysis was used to identify duplication, fragmentation, overlap, contradiction or gaps in coordination between key players.

CHAPTER THREE

3.0 SYSTEMS AND PROCESS DESCRIPTIONS

3.1 Roles and responsibilities of key players

The monitoring and enforcement of noise pollution standards by NEMA and selected cities involves several key stake holders, who play different roles and have different responsibilities, as mapped in the table below. Details of these have been provided in **Appendix IV.**

Table 4: Stakeholder mapping for players in the monitoring and enforcement of noise pollution

Stakeholder	Identification and prioritisation of noise hotspots	Complaint handling and enforcement	Sensitisation and Compliance assistance	Resourcing
NEMA	Conduct inspections, review past performance	Maintain complaints database, verify complaints received, enforce compliance, support Cities where required, follow-up, close cases, oversee and track compliance enforcement nationally	Provide compliance assistance to the regulated community; guide and train cities.	Recruit, train and equip staff adequately to monitor and enforce compliance to NEMA standards
City Authorities	Conduct local monitoring and submit reports	Maintain complaint logs, verify complaints, enforce compliance, follow-up, close cases, submit periodical reports to NEMA	Sensitise and guide polluters	Recruit, train and equip staff adequately to monitor and enforce compliance
Police and UPDF	N/A	Support monitoring, enforcement and follow-up	N/A	Liaise with NEMA and Cities to ensure staff get appropriate training
Public/Complainants	Report complaints	Provide feedback/satisfaction input	N/A	N/A
Regulated community (Polluters)	N/A	Maintain compliance/ Respond to enforcement actions	Implement recommended measures	N/A

3.2 Process description

a) Identification and prioritisation of noise hotspots and sensitive receptors

The Authority and the selected city authorities are mandated under the National Environment Act, Cap.181 and the National Environment (Noise Standards and Control) Regulations, 2003 to identify, monitor and regulate key noise-generating

activities. Every year, the process of identifying and prioritising noise hotspots should begin with a review of noise complaints received, past monitoring and inspection reports, enforcement actions and follow up reports. It should also take into consideration conditions of approval for Environmental and Social Impact Assessments (ESIA) undertaken, the current physical planning zonation of the cities and the type of trading license issued for existing businesses.

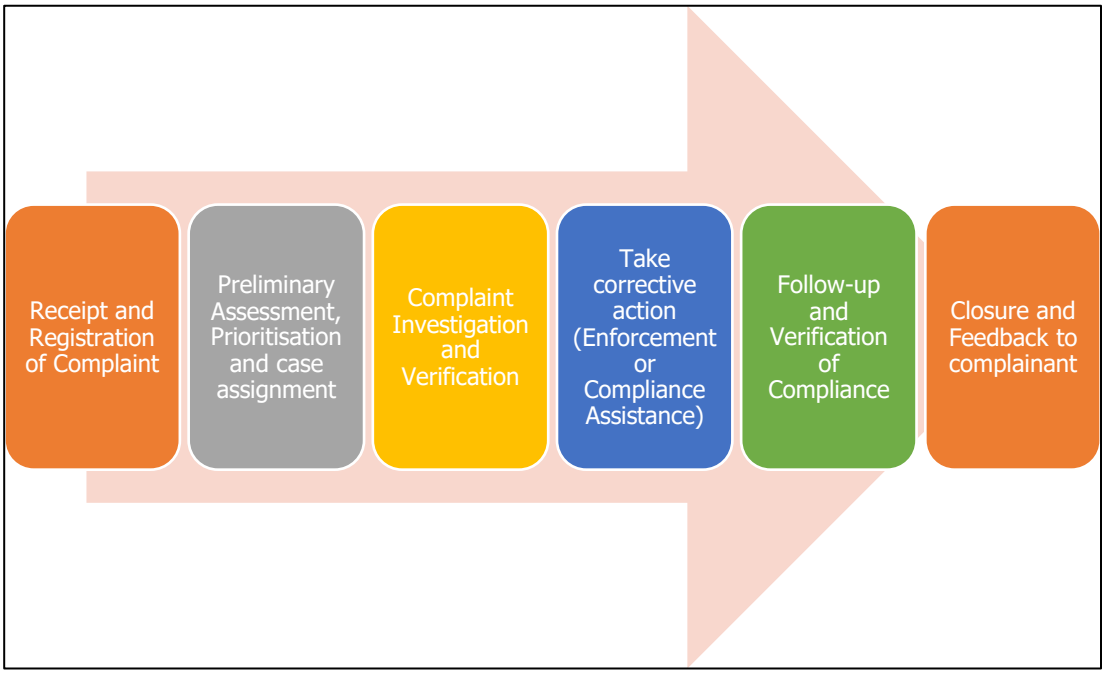
Using the above information, NEMA and city environment officers should map out likely noise pollution hotspots such as bars, places of worship, advertising vans, construction sites and entertainment venues and sensitive receptors such as schools, hospitals and residential buildings.

Once potential hotspots are identified, monitoring teams should schedule targeted assessments based on risk and population exposure. NEMA and the city authorities should prioritise areas with recurrent complaints, proximity to sensitive receptors, number of people affected and zones where non-compliance has been historically high for inclusion in the quarterly and annual work plans for noise monitoring and enforcement. The results of these activities should be used to compile a list of the potential nose hotspots.

b) Complaint handling

The figure below illustrates the key steps for effectively handling noise pollution complaints from receipt to closure:

Figure 1: Steps for handling noise pollution complaints from receipt to closure



***Source**: OAG interviews with NEMA and city environment officers*

Members of the public may lodge a complaint with the city or NEMA regarding noise disturbances through various channels including written letters, phone calls, emails, social media platforms, in-person walk-ins among others. NEMA and the cities should record and document all complaints received, capturing essential details like the nature and location of the complaint.

The complaint should be classified by priority (low, medium, high) and then forwarded to the head of department who should then assign the complaint(s) received to an environment officer for verification and action.

The environment officer is expected to verify the complaint received in the company of the environment police and another witnessing officer by measuring actual noise levels using a calibrated meter and gather supporting information from complainants and/ or neighbours. When readings are found to be in excess of the permissible limits, the environment officer should apply compliance assistance or enforcement action measures to ensure that the noise levels reduce to be within the permissible levels.

Once compliance assistance or enforcement is done, a follow-up inspection should be conducted to verify whether the polluter has taken the required corrective actions. If compliance is achieved, the case should be formally closed and feedback shared with the complainant. If the polluter has not implemented the suggested corrective actions the more stringent enforcement measures such as fines, closure of premises should be undertaken.

c) Sensitisation and Compliance Assistance

Sensitisation of the general public

Sensitisation of the public should aim at increasing awareness of what constitutes noise pollution, its health impacts, and how to report violations. The Environment Education Unit at NEMA and city environment offices should conduct quarterly outreach activities by preparing and disseminating Information Education and Communication (IEC) materials through print, radio, TV and/or social media, engaging local leaders, and integrating noise-pollution messages into school environmental education programmes.

Compliance assistance for the Regulated Community (Polluters)

Compliance assistance should encompass all actions that help regulated entities understand and meet noise-control requirements. NEMA's compliance and Enforcement department and city environment officers should undertake quarterly targeted sensitisation for bars, event organisers, churches, industries and other facilities, including pre-event briefings for events such as concerts, crusades or rallies, distribution of guidance on legal noise limits, permissible operating hours and recommended noise-control equipment. In addition, compliance assistance should include routine advisory visits to demonstrate correct use of noise-control equipment, explain licence conditions, and provide corrective guidance where gaps are identified.

NEMA and cities should also enter into compliance agreements with polluters with specific timelines given for different compliance measures to be put in place.

d) Enforcement of standards

Enforcement includes all actions by NEMA and the city authorities to ensure that entities comply with the set noise limits. Enforcement should follow confirmation of a noise standard violation through a site inspection. The environment officer from NEMA/ the City may issue a verbal warning for minor or first-time offenders. For more serious or repeated offences, an inspection report, together with an improvement notice should be issued highlighting the violation and necessary corrective actions such as soundproofing or adjusting operations, along with a compliance period and clear consequences for failing to comply.

After the compliance timeline expires, inspectors should return to verify whether corrective actions were implemented. If the polluter complies, the case should be documented and closed. If violations persist, enforcement should escalate to tougher measures like equipment impoundment, administrative penalties (fines), or temporary closure of operations until compliance is achieved.

Cases showing obstinate, repeated or high-risk non-compliance should be escalated for legal action under the National Environment Act Cap.181. This may involve prosecution and court-issued sanctions. All enforcement steps including warnings, notices, penalties and prosecutions undertaken by the city authorities and NEMA regional offices should be documented and reported to NEMA headquarters quarterly for national tracking and accountability.

e) Coordination with other stakeholders

The National Environment Management Act Cap.181 mandates NEMA to be the primary agency responsible for coordinating all environmental activities in the country. NEMA should coordinate and collaborate with various stakeholders in undertaking planning, resource mobilisation, environmental monitoring, inspections, enforcement, and compliance audits. These collaborative actions help streamline responsibilities and enhance the effectiveness of noise pollution monitoring and enforcement.

In particular, NEMA and the city authorities should coordinate with each other as well as with the police and local council to support complaint verification, community mobilisation, compliance assistance, enforcement actions and the courts of law to handle legal sanctions against noise polluters. The table below refers;

Table 5: Roles, frequency and expected outputs from stakeholder coordination

Activity Requiring Coordination	Stakeholders Involved	Roles/Responsibilities	When does coordination occur?	Expected Outputs
Issuing licenses and Permits	NEMA/city authority with revenue department	Assess and review environmental risks. Issue EIA requirements. Issue permits/licenses that reflect environmental concerns including noise pollution.	During permit/license application review	Environmentally screened permits/licenses EIA compliance conditions
Noise Level Inspections	NEMA, City environment officers, Police.	NEMA and City authority conduct noise measurements. Police offer security during the noise inspections.	Routine or as triggered by complaints.	Joint noise level reports. Identification of violators. Documented hotspots
Enforcement of standards	NEMA, City authorities, Local Council Chair person, Environment Police	Issue warnings, draft and serve improvement notices Enforce penalties for noise violations. Police and local council chairperson support complaint verification and enforcement actions and, Impound equipment if necessary. Courts of law provide legal sanctions against noise polluters	Upon identified cases of non-compliance or repeated violations	Legal notices Enforcement records Improvement notices Confiscation records Legal notices

Source: *OAG interviews with NEMA and city officials*

City authorities are required to prepare and submit quarterly and annual reports to NEMA detailing monitoring, enforcement, sensitisation and compliance assistance actions relating to noise undertaken within the period.

NEMA should then consolidate this information into quarterly and annual performance reports, and the biennial National State of Environment Report. This information should be used to aid decision-making, including prioritisation of focus areas and planning for monitoring and enforcement, and designing sensitisation and compliance assistance interventions for the public and the regulated community.

CHAPTER FOUR

4.0 FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

This chapter presents the findings and conclusions from the assessment of the measures by NEMA and the selected city authorities in monitoring and enforcing noise pollution standards in Uganda. The chapter also provides recommendations to address the noted areas of weakness.

4.1 Identification and prioritisation of noise pollution hotspots and sensitive receptors

Section 9 of the National Environment Act, Cap.181 mandates NEMA to regulate, coordinate and monitor environmental quality, while local governments are required to conduct regular environmental monitoring and reporting. The Noise Standards and Control Regulations (2003) further oblige both NEMA and the cities to establish mechanisms for identifying, monitoring and controlling noise pollution.

Good practice also requires environment authorities to maintain updated data on noise hotspots and sensitive receptors, and to integrate monitoring results, complaints, number of people affected, and compliance history into planning and budgeting.

The audit revealed that neither NEMA nor the selected cities had structured systems or procedures for identifying, categorising or prioritising noise-pollution hotspots. Interviews with NEMA and the environment officers from all the selected cities confirmed that hotspot identification relied almost entirely on incoming complaints and ad hoc inspections, with no proactive field assessments or baseline surveys to map high-risk zones such as schools, hospitals or residential neighbourhoods.

It was further noted that even where high-risk patterns were known to NEMA, these were not flagged and prioritised in NEMA's annual and quarterly monitoring plans. A review of the NEMA database for the financial years 2022/2023-2024/2025 revealed 175 high risk cases that were not flagged for inspection. Out of the 175 cases, 31 were facilities with repeat complaints, 77 facilities were cases of complaints filed jointly by multiple residents while 67 were complaints received from residential areas.

At the city level, complaint management was similarly unsatisfactory and weak. Most complaints were undocumented, and even where written complaints existed, repeat cases were not given priority. The audit found one (1) such case in Mbarara, three (3) in Jinja, four (4) in Soroti and two (2) in Hoima.

The audit further revealed that neither NEMA nor the cities tracked how much of their environmental-monitoring resources were directed to noise pollution. Work plans and budgets did not indicate allocations for noise, and officials stated that responses were funded on an ad hoc basis "when funds were available."

Interviews with NEMA and the environment officers from all the selected cities revealed that noise pollution was not treated as a priority area. For instance, NEMA spent only

2.1% of its monitoring and enforcement budget on noise during the review period. For cities, the expenditure could not be reliably estimated because work plans and performance reports were too generic to distinguish noise-related activities, though officers acknowledged that spending on noise was minimal.

The current reactionary and ad-hoc practice by NEMA and the City authorities of identifying and categorizing polluters is ineffective in promoting compliance with the noise standards.

Management response

Section 11 of the National Environment Act, Cap 181 places responsibility to manage noise among others on the respective Local Governments and Urban Authorities. NEMA comes in to support and provide oversight and or handling cases that the Local Governments have not been able to resolve. The funds for doing this work are part of the inspectorate and monitoring budget and as such there is no specific dedicated budget to manage noise as Noise pollution management mandate is that of the Local Governments.

Audit comment

Although NEMA maintains that the primary responsibility for managing noise pollution (among other issues) lies with the respective local governments and urban authorities, Section 9 of the National Environment Act, Cap.181 empowers NEMA to require performance from, and to hold accountable, the lead agencies, including the local governments and urban authorities, for the proper execution of their environmental management mandates.

Furthermore, NEMA remains the principal agency in Uganda for the regulation, monitoring, supervision, and coordination of all environment-related activities implying that environmental management remains a shared mandate between the local governments and NEMA.

Conclusion

The existing monitoring systems established by NEMA and the selected cities are ineffective in identifying hotspots and protecting sensitive receptors, leaving communities exposed to uncontrolled noise pollution. Neither NEMA nor the cities have structured, proactive mechanisms for mapping high-risk areas or sensitive receptors such as schools, hospitals, and residential neighbourhoods.

Identification of noise pollution sources remains entirely reactive, dependent on public complaints and ad hoc inspections, with no baseline surveys, risk categorisation, or systematic integration of complaint patterns, population exposure, or compliance history into planning. As a result, high-risk and repeat cases are routinely left unflagged and unprioritized in both NEMA's and the cities' work plans.

Recommendations

NEMA and the cities should;

1. Develop a comprehensive, data-driven system to map noise hotspots and sensitive receptors, and to flag and prioritize high-risk cases. In addition, NEMA should plan and allocate resources specifically for noise-pollution monitoring and enforcement to ensure timely and effective action on the prioritised high-risk and repeat noise cases.

2. Strengthen the role of cities by issuing guidelines that mandate inclusion of noise pollution hotspot identification, monitoring activities, and resource allocation in their quarterly environmental reports.

4.2 Tracking of complaints and actions taken

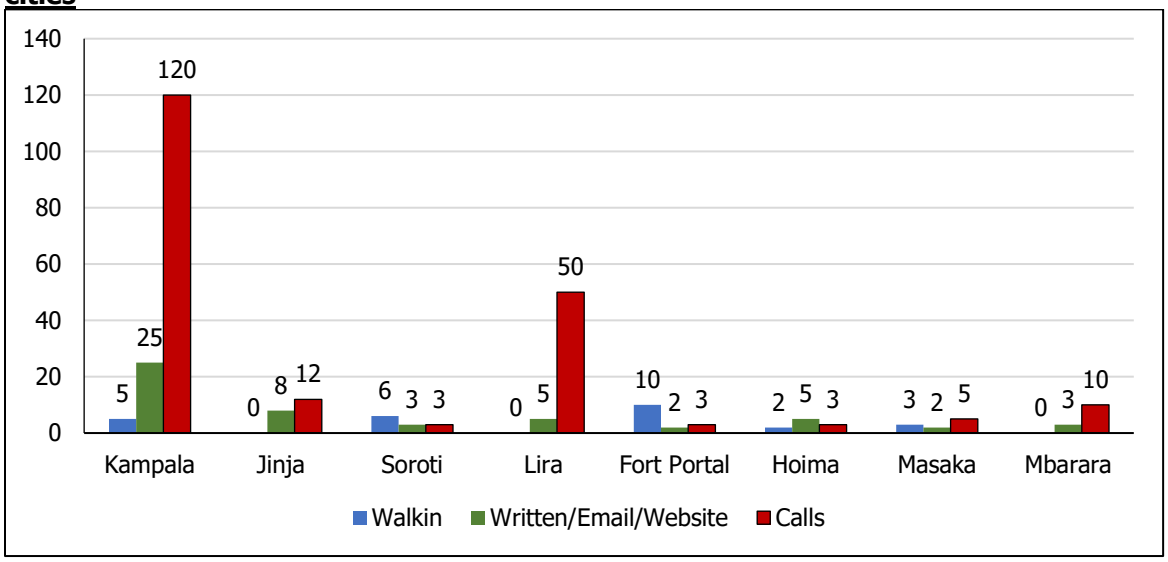
Regulation 15(1), (3) and (4) of the National Environment (Noise Standards and Control) Regulations, 2003 allows any person to file a noise complaint with the Executive Director of NEMA or the relevant authority (such as a city/ local council) without the need to prove personal harm.

A review of NEMA's electronic documentation system (eDOC) indicated that whereas NEMA received noise complaints through various channels, the eDOC system only captured written submissions. NEMA officials indicated that walk-ins and telephone complainants were asked to either write a letter to NEMA, or to send an email of their complaint before action could be taken. This is because the Authority captures only formal written and email submissions.

It was also observed from a walk-through of the eDOC system that tracking of registered complaints stops at assigning an officer to investigate and address the complaint. The system lacks the capability to track specific actions taken in response to each complaint and/or to confirm whether the complaints have been resolved.

Based on interviews with the environment officers in all the eight selected cities, audit established that the selected cities received on average 285 complaints per month. Further analysis of the above responses showed that 9% of the noise-related complaints were received through walk-ins, 72% through phone calls and only 19% were in writing. A detailed breakdown of the average number of complaints received through different complaint channels per month for the selected cities is shown in the figure below:

Figure 2: Average number of complaints reported per month per channel in the selected cities



Source: *Interviews with city officials*

The audit however established that only KCCA had a structured register or database to document these cases or action taken to address them. However, in its database, it does not document the compliance history of the offender making it difficult to track improvements in compliance or repeat offenders.

The other seven (7) cities did not have any mechanisms for documenting complaints from telephone calls and walk-ins. The failure to document all received noise complaints implies that 79.3% of the monthly complaints (calls and walk-in) received in the seven (7) cities[24] were not recorded and therefore could not be tracked to determine whether any action was taken to address them.

Management response

A module on incident reporting and case management is part of the Environment Licensing and Management Information System (ELMIS) where complaints including noise pollution shall be reported, assigned, documented and handled.

Accordingly, the system shall be rolled out to the public by February 2026, and it will address the issue of complaints documentation including for noise pollution (from complaint receipt to closure). This system shall have a mobile application feature and be made accessible by everyone to enable the public to log in complaints.

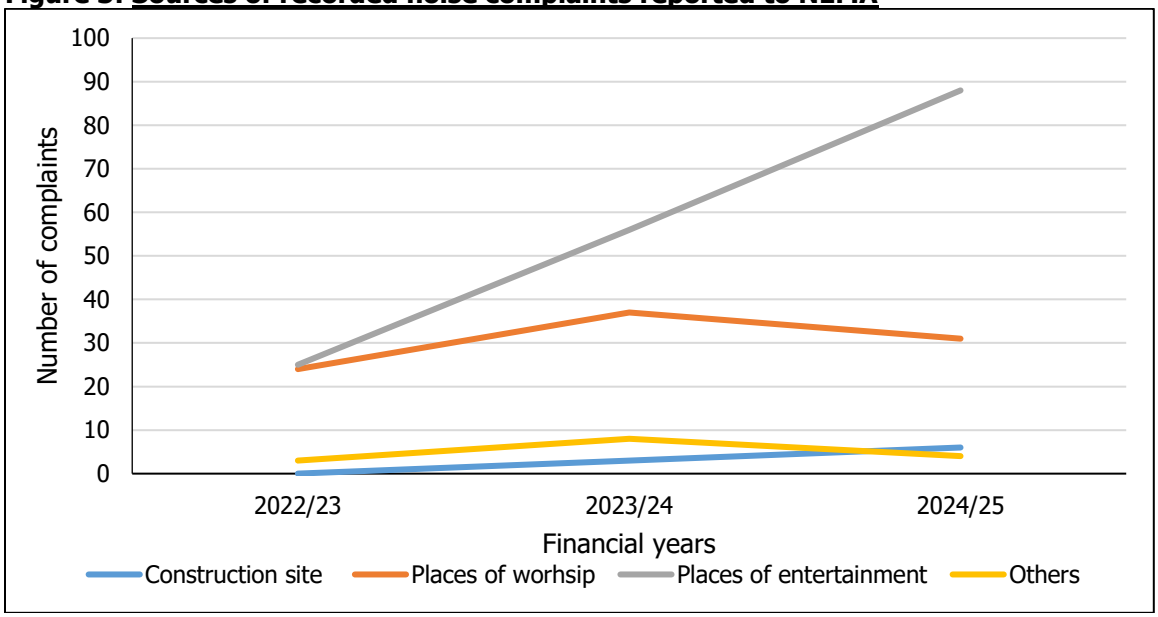
b) Sources of noise complaints

The audit further reviewed a sample of 285 noise pollution complaints reported to NEMA between 2022/23 and 2024/25, and noted that they were all logged and assigned for follow-up in the system. From these complaints, 59% concerned noise from places of

[24] Soroti, Jinja, Lira, Masaka, Hoima, Fort Portal, Mbarara

entertainment, 32% from places of worship, 3% from construction sites while 5% were other sources including metal workshops, dogs and stone quarries. Details are shown in the figure below;

Figure 3: Sources of recorded noise complaints reported to NEMA



Source: *OAG review of Noise complaint reports*

The figure shows a rapidly rising trend of complaints registered about places of entertainment, while those concerning places of worship dropped slightly in 2024/25.

Management response

The rising trend of complaints on entertainment places is due to public awareness of their right to a clean and healthy environment and the rising number of entertainment places in residential areas. There is need for cities to zone and have proper land use to avoid mixing incompatible land uses.

c) Actions taken on recorded complaints by NEMA and selected cities

Interviews with NEMA and all the environment officers from the selected cities, and review of documents indicated that, only 16.8% of cases filed with NEMA and 52.5% of those filed with the cities were investigated by the respective authorities. Corrective action (enforcement or compliance assistance) was administered in 10.8% and 46% of the NEMA and city cases respectively, as summarised in the table below.

Table 6: Action taken on complaints received by NEMA and Cities

Entity	Noise complaints on record	Preliminary Assessment, Prioritisation and case assignment done	Complaint Investigation and Verification undertaken	Corrective action (Enforcement or Compliance Assistance) undertaken	Follow-up and Verification of compliance done	Closure and Feedback to complainant done
NEMA	285	285	48	31	1	0

Entity	Noise complaints on record	Preliminary Assessment, Prioritisation and case assignment done	Complaint Investigation and Verification undertaken	Corrective action (Enforcement or Compliance Assistance) undertaken	Follow-up and Verification of compliance done	Closure and Feedback to complainant done
Kampala City*	266	266	138	138	0	0
Hoima City	15	15	13	0	0	0
Jinja City	5	5	3	2	0	0
Lira City	4	4	4	0	0	0
Masaka City	8	8	0	0	0	0
Soroti City	4	4	3	2	0	0
Mbarara City	5	5	1	0	0	0
Fort portal	1	1	0	0	0	0
Total	**593**	**593**	**210**	**173**	**1**	**0**

**For KCCA, the information available is only for 2025*

Source: *OAG analysis of noise complaints and actions undertaken. (2022/23-2024/25)*

Review of documents revealed that NEMA conducted only one follow-up activity throughout the entire review period, while the selected cities conducted no subsequent follow-ups to ensure continued compliance by offenders. Additionally, neither NEMA nor the selected cities formally closed any cases or provided feedback to complainants. The Authority (NEMA) and the cities explained that the practice was that, following enforcement, if they did not hear from a complainant again, they took it to mean that the issue had been resolved.

However, from interviews with 46 past complainants[25] who had reported to NEMA or the selected city authorities, 42 (91%) complainants indicated that the noise pollution continued or worsened due to inaction, or even after enforcement action by NEMA or the cities, or resumed after a short cessation. This resulted in resignation to their situation, believing follow-up was futile.

Field visits confirmed the complainants' assertions that non-compliance remained widespread even after reporting the case or enforcement. Of the 16 facilities inspected in Kampala, Jinja, Soroti, Lira, and Hoima, each previously subjected to enforcement actions such as verbal warnings, improvement notices, or equipment impoundment, 15 (94%) were still found to be violating noise pollution standards.

The weak handling and follow-up of noise complaints resulted mainly from the absence of Standard Operating Procedures (SOPs) for documentation, verification, follow-up and closure of complaints and the low prioritisation of noise complaints by NEMA and the cities.

The weaknesses in the prioritisation and handling of noise complaints resulted in delayed enforcement and resolution of reported cases and, continued frustration of citizens.
Twelve 12(67%) out of 18 complainants who reported to NEMA and 22(78.5%) out of 28 complainants from the selected cities expressed dissatisfaction with the complaint handling process as detailed in the table below;

[25] These were complaints on record, of which 18 were from NEMA and 28 from the cities

Table 7: Complainant satisfaction with NEMA and City response to noise complaints

Who complainants reported to	Total Number of Complainants	Satisfied	% Satisfied	Not Satisfied	% Not Satisfied
NEMA Head Office	18	6	33%	12	67
Selected Cities and Regional Branches	28	6	21%	22	79
Total	**46**	**12**	**26%**	**34**	**74**

***Source**: Results from interviews of complainants*

It was noted that one frustrated complainant from Fort portal (Night Rose Hotel) has dragged NEMA and Fort Portal City council to court over perceived non-responsiveness in handling a noise complaint filed previously, and lack of follow up to see that the issue is resolved. Two (2) complainants from Jinja and Lira were also threatening to do the same.

Management response

NEMA undertakes inspections and investigations of received noise complaints for legal actions that may include but not limited to prosecution, impounding of the machinery or instruments that have caused the noise emission and issuance of administrative fines. The Authority also conducts follow-up inspections for the facilities that had a previous history of noise pollution to check on performance and compliance.

The Standard Operating Procedures (SOP) for documentation, verification, follow-up and closure of complaints will be provided for under the revised noise Regulations that are being finalised.

Audit comment

Although the NEMA asserts that it conducts follow-up inspections on facilities with a previous history of noise pollution to verify performance and compliance, management provided only one report for verification to substantiate this claim.

Conclusion

The mechanisms in place at NEMA and the selected cities are inadequate to enable the systematic capture and tracking of noise-related complaints from receipt through to follow-up and closure. NEMA's eDOC system stops tracking after officer assignment, and records no actions undertaken on the assigned complaints, while seven of the eight selected cities lack any documentation system for the complaints received.

Generally, follow-up inspections are non-existent (only one documented in three years), no cases are formally closed, and complainants receive no feedback. This renders the complaint-handling process unaccountable, ineffective, and limited in its ability to support meaningful enforcement or result in sustained reductions in noise pollution violations.

Recommendation

1. NEMA should fast track the completion and roll out of the ELMIS complaint module and ensure that it captures all complaints regardless of channel (phone, walk-in, social

media, etc.), tracks every stage from receipt to closure, flagging repeat offenders, among others.

2. The Authority should develop, disseminate and enforce Standard Operating Procedures to guide all authorities in recording, prioritising, investigating, and providing feedback on noise complaints to ensure timely and consistent resolution.

4.3 Staffing, capacity building and availability of appropriate equipment

4.3.1 Adequacy of the staffing

The NEMA Strategic Plan[26] (2020/21–2024/25) requires the Authority to review staffing and reporting structures at the headquarters and regional offices and build their capacity to better deliver on its constitutional mandate. Section 106 of the National Environment Act, Cap.181 further mandates NEMA, in consultation with lead agencies, to undertake measurements of noise levels from all sources and ensure compliance with permissible standards.

The audit reviewed the NEMA staffing levels and noted the following;

a) Staffing at NEMA Headquarters and NEMA Regional Offices

A review of NEMA staffing records revealed that there were 130 officers assigned to support noise pollution monitoring and enforcement by NEMA. Of these, 23 are NEMA technical staff, including six (6) inspectors who were recruited in December 2023 to handle air, noise, noxious smells and other general inspections. Fifty-seven (57) are secondments from Uganda Police Force (UPF) and 50 are Uganda Peoples' Defence Forces (UPDF) officers who have recently been attached to NEMA (effective 1st November 2025). UPF and UPDF officers do not conduct the actual monitoring and enforcement but rather provide security back up during the activities. Details are in the table below;

Table 8: Staff assigned to support noise pollution monitoring and enforcement under NEMA

NEMA Regional Office	Number of Staff	Police Seconded to NEMA	UPDF officers	Overall total
NEMA Headquarters	6	25	22	**53**
Mbale Regional Office	5	6	7	**18**
Lira Regional Office	4	6	7	**17**
Mbarara Regional Office	4	10	7	**21**
Hoima Regional Office	4	10	7	**21**
Total	**23**	**57**	**50**	**130**

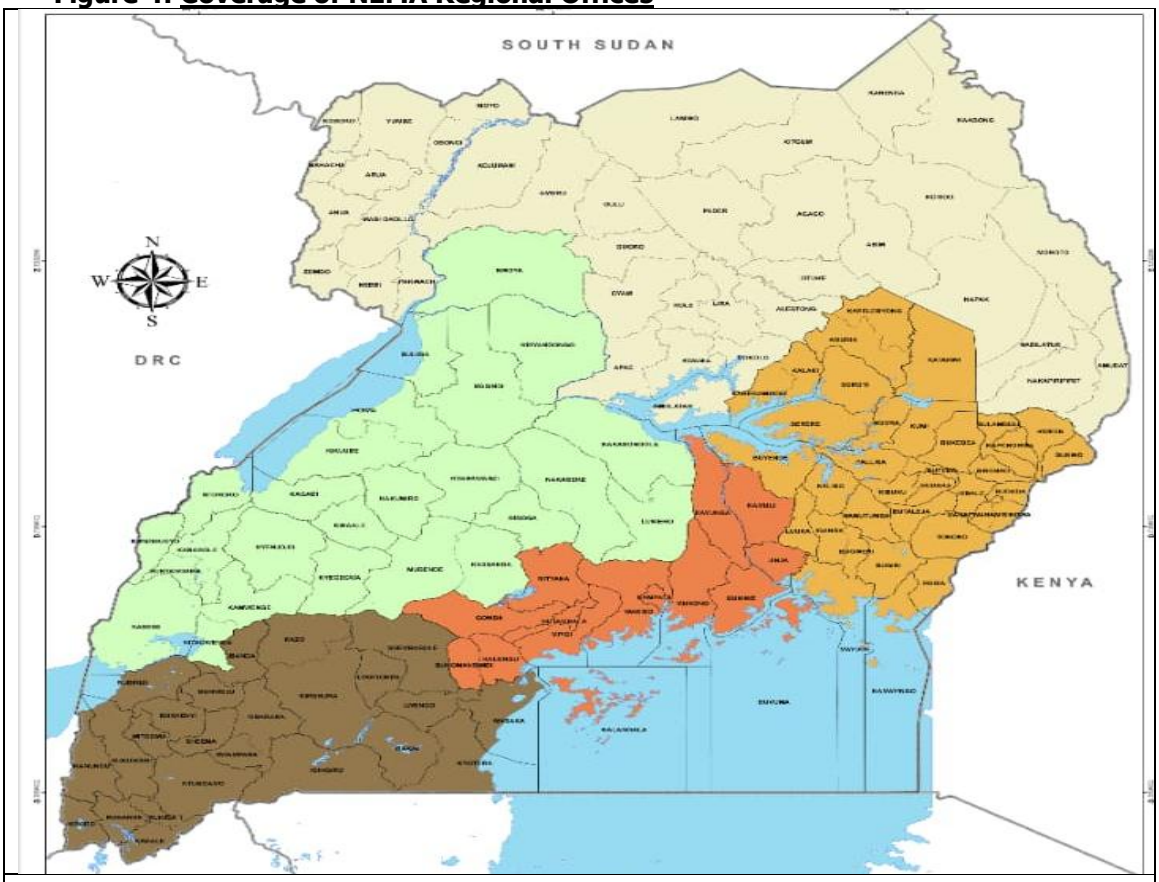
***Source**: NEMA Human Resource department*

Although all 23 NEMA technical staff handle noise pollution, none of them prioritise it, since they are also responsible for a wide range of other duties that NEMA considers higher priority, such as inspections of factories and construction sites, protection of wetlands and forests, and management of waste, plastics, and water pollution.

[26] Section 2.4, Pg 26 and 27

Moreover, the extensive coverage of each regional office further constrains the capacity of the regional officers to effectively monitor or respond to noise pollution incidents within their areas of jurisdiction as illustrated in the figure below;

Figure 4: Coverage of NEMA Regional Offices



Legend	Office	Coverage (Districts, Cities and Muncipalities)
	NEMA HQ	29
	Mbarara Regional Office	39
	Hoima Regional Office	27
	Lira Regional Office	41
	Mbale Regional Office	49

***Source**: NEMA GIS Unit*

b) Staffing within City Authorities

In the selected cities, staffing for environmental management remains below the approved structure with less than half of the positions filled, as shown in the table below;

Table 9: Staffing gaps in the selected cities

City	Approved Structure	Number of Environment Officers	Staffing Gaps
Masaka City	6	2	4
Lira City	6	1	5
Mbarara City	6	2	4
Jinja City	6	2	4

City	Approved Structure	Number of Environment Officers	Staffing Gaps
Soroti City	6	2	4
Fort Portal City	6	1	5
Hoima City	6	2	4
Kampala City	10	5	5
Total	**52**	**17**	**35**

Source: *Staff structures for the city Natural Resources Departments and interviews with City Natural Resources Officers.*

From the above table, the selected cities have a staffing gap of 35 positions, representing 65% of the approved structure for environment management. The 17 environment officers indicated that they were unable to effectively monitor and enforce noise pollution standards given that they are charged with other responsibilities including wetland management, waste management, forest management, water pollution and plastic pollution. In addition, budget constraints have limited recruitment of environment officers to address the staffing gaps in the cities.

Some city environment officers explained that whereas effective monitoring and enforcement for noise pollution would require them to work overtime (night hours), this was difficult without compensation for the effort and risk involved in working at such odd hours, and yet the city councils do not provide for over time/ night allowance as this would contravene the Public Service Standing Orders, 2021[27].

The above limitations have constrained the ability of both NEMA and city authorities to effectively monitor and enforce noise-pollution standards, resulting in irregular inspections and delayed responses to complaints.

Management response

There is need to increase the number of inspectors on the structure as well as resources for their effective delivery.

4.3.2 Capacity building by NEMA and City Authorities

The audit noted that none of the cities organised any training or refresher on noise pollution for their environment officers.

On the other hand, NEMA trained Environment Officers from NEMA Headquarters, Regional Offices, and City Authorities on environmental management during three (3) training sessions[28] held in March 2024 at Source of the Nile Hotel (Jinja), May 2024 at Imperial Botanical Beach (Entebbe), and February 2025 at Acholi Inn Hotel (Gulu), targeting environmental inspectors.

A review of the lists of participants to these trainings indicated that NEMA staff were all trained while only one environment officer (from Masaka) attended one[29] of the above trainings. However, review of the training materials and presentation slides used in the

[27] Section (E-c)(34)
[28] Reports on training workshops for environmental inspectors of Uganda held in Jinja Entebbe and Gulu
[29] In Jinja

above workshops indicated that they did not cover key practical aspects such as operation and calibration of noise meters, procedures for obtaining reliable noise readings, preparation of inspection reports and improvement notices, or appropriate enforcement actions based on the severity of offences and compliance history.

Additionally, although during interviews with NEMA and city authorities, they stated that that seven (7) officers from NEMA and eight (8) officers from the selected cities had received training related to noise pollution management (see table below) either from NEMA, the Uganda Support to Municipal Infrastructure Development (USMID) Programme, or Air Water Earth (AWE) Limited, no evidence was provided to corroborate these assertions.

Table 10: Number of trained NEMA and City staff in noise pollution

Institution / Region	Total Staff	Trained in Noise Pollution	% Trained	Facilitator / Training Institution
NEMA Headquarters	6	6	100%	NEMA
NEMA Regional Offices (Mbale, Lira, Mbarara, Hoima)	17	17	100%	NEMA
Lira City Council	1	1	50%	USMID
Jinja City Council	2	1	50%	USMID
Soroti City Council	2	1	50%	USMID
Hoima	2	0	0%	N/A
Masaka	2	1	50%	NEMA
Mbarara	2	0	0%	USMID
Fort Portal	1	0	0%	USMID
Kampala	5	5	100%	AWE[30]
Total	**40**	**32**	**80%**	

***Source**: Review of training reports for NEMA training of Environmental Inspectors, and OAG Interviews with Environment Officers from selected cities*

While these trainings improved the officers' general understanding of noise pollution monitoring and enforcement, the audit revealed inconsistencies in how these activities were conducted by different officers. These variations indicate that there are still knowledge gaps in the practical aspects of noise measurement and enforcement. The specific variances observed are presented in the table below;

Table 11: Observed variances in measurement and enforcement of noise pollution by different officers

Aspect of Variation	Description / Examples of variations observed
Measurement Units Used	One city officer used dB(C) while others used dB(A); dB(C) readings were higher and inconsistent.
Measurement Locations	Starting points varied. NEMA HQ, Lira City and KCCA measured from the complainant's residence, whereas Mbarara regional office and Hoima city measured at 20 meters, Soroti city at 30 meters, Jinja and Masaka at 50 meters from the polluter's premises. Jinja and Soroti further indicated that they take additional measurements inside the polluter's premises.
Reporting Practices	NEMA issued improvement notices or on-site reports with readings, while Jinja, Soroti and Lira issued improvement notices

[30] Air Water Earth Limited

Aspect of Variation	Description / Examples of variations observed
	or on site reports without noise readings. Hoima, Masaka did not share feedback of the inspection results to the inspected facilities.

The team did not conduct inspections in Fort Portal because the environment officer handed over the noise meter to the police who did not know/ have the mandate to take noise measurements while the sound level meter for Mbarara city was faulty.

***Source**: OAG Team observations from noise inspection operations conducted with NEMA and City staff*

Management response

The Authority provides capacity building support to Urban Authorities subject to the availability of resources.

Regarding the procedures and protocols for measurement of noise, this will be provided for in the revised Noise pollution regulations (currently in draft form) that will provide for taking measurement at the source, or at the relevant receiver, or at a relevant proxy position. In addition, the factors that affect sound propagation vary and these include background noise, and wind direction.

Under decentralisation, city environment officers are staff of the Local Government and NEMA can only come in to support as and when funds are available. Also, whereas NEMA is required to undertake capacity building to urban authorities, this is subject to availability of funds.

Audit comment

A review of the attendance registers for all workshops showed that besides NEMA, only Masaka was represented among the selected cities, and only in one training, indicating gaps in the extent to which NEMA provides capacity building support to urban authorities.

4.3.3 Adequacy and Accuracy of Noise Monitoring Equipment

a) Adequacy of noise meters

The audit assessed whether the regulated facilities had installed sound level measuring equipment, and whether NEMA and city authorities possess sufficient, functional, and calibrated noise-monitoring equipment to support effective enforcement of noise-pollution standards.

Only one facility[31] out of the 29 visited had installed sound-level measuring equipment, contrary to the legal requirement[32]. This was because none of the city councils made installation a condition for approval of occupation. Even the one facility that had installed the equipment did so later, following enforcement action and compliance-assistance engagement by KCCA and NEMA.

Additionally, through interviews with NEMA officials and the environment officers from all selected cities, and physical inspections, it was noted that NEMA and the selected city

[31] La Gatos

[32] Regulation 8(2) of the National Environment (Noise Standards and Control) Regulations, 2003.

authorities collectively possessed 24 sound-level meters, of which seven (7) were not operational/ faulty at the time of the audit. NEMA accounted for 14 meters distributed between the Headquarters and four (4) regional offices, while the cities collectively had ten (10) meters. NEMA and KCCA purchased their own sound level meters while the cities received theirs under the USMID Project. The breakdown is shown below;

Table 12: Total number vs. operational sound meters at NEMA and Cities

Institution / Location	2018	2022/23	2023/24	2024/25	Total	Not Operational/ Faulty*
NEMA (HQ & Regional offices)	0	6	0	8	14	5
Jinja City	1	0	0	0	1	1
Soroti City	1	0	0	0	1	0
Lira City	1	0	0	0	1	0
Fort Portal City	1	0	0	0	1	0
Masaka City	1	0	0	0	1	0
Mbarara City	1	0	0	0	1	1
Hoima City	1	0	0	0	1	0
Kampala (KCCA)	3	0	0	0	3	0
Total	10	6	0	8	24	7

**Faulty means not operational, lacking the windscreen or classified as "moderate" in NEMA inventory implying that they give unreliable results.*

Source: *Review of NEMA inventory and physical inspections.*

The table above shows that NEMA had more than doubled its number of sound level meters by acquiring eight (8) in financial year 2024/25. On the other hand, Jinja and Mbarara cities had not repaired or replaced the sound level meters they received from USMID once they became faulty.

NEMA noise inspectors interviewed stated that the ideal ratio of sound level meters required to support effective routine monitoring and timely response to complaints is one sound level meter for every two staff. The table below shows the extra number of noise metres required per regional office/city based on the above logic;

Table 13: Number of noise meters required per regional office / city

Institution / Location	No. of staff	No. of functional meters	No. of extra noise meters required
NEMA HQ	6	6	0*
Mbale Regional Office	5	0	3
Lira Regional Office	4	0	2
Hoima Regional Office	4	2	0
Mbarara Regional Office	4	1	1
Jinja City	2	0	1
Soroti City	2	1	0
Lira City	1	1	0
Fort Portal City	1	1	0
Masaka City	2	1	0
Mbarara City	2	0	1
Hoima City	2	2	0

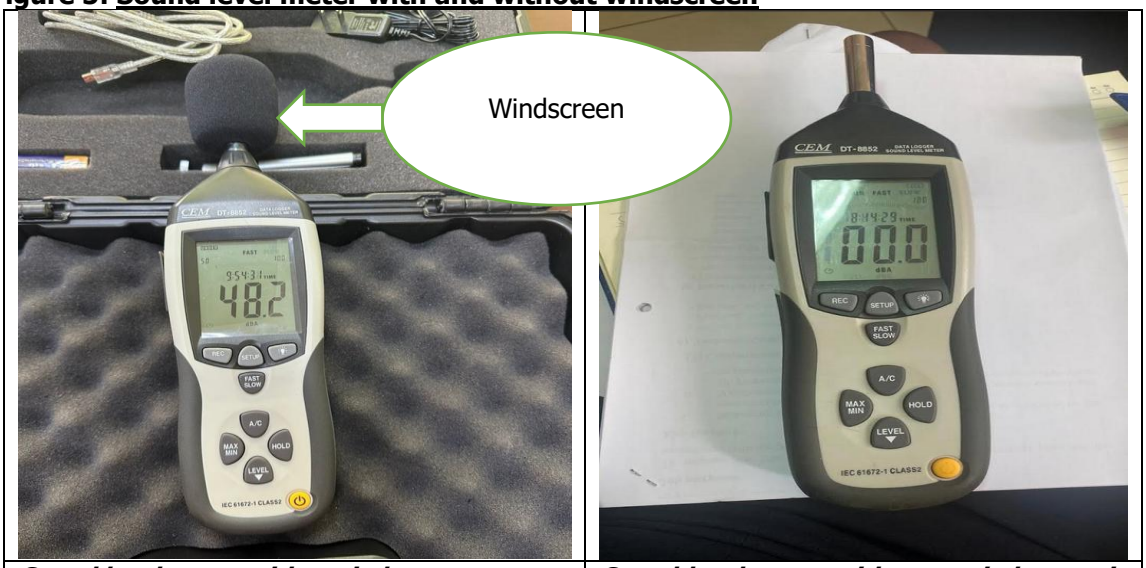
Institution / Location	No. of staff	No. of functional meters	No. of extra noise meters required
Kampala (KCCA)	5	3	0
Total	**40**	**18**	**8**

**Based on the ratio of one meter to two staff, NEMA HQ had three excess noise meters.*
***Source**: Review of NEMA inventory and physical inspections.*

In Mbarara City, officials reported that their only sound-level meter, was not functional, and as a result, they were unable to undertake noise measurements or verify complaints. The Hoima City environment officer had never used the meter, citing lack of training, while those of Fort Portal and Jinja had handed theirs over to the police to use, stating that they were unable to conduct night inspections.

The audit further established that noise meters in Jinja City and Lira regional office lacked the windscreen. The purpose of this windscreen is to reduce the effects of wind noise and other unwanted noises that can interfere with accurate sound measurements thereby ensuring that the readings primarily reflect the sound that is being measured. The figure below refers;

Figure 5: Sound level meter with and without windscreen



Sound level meter with a windscreen. | ***Sound level meter without a windscreen in Jinja***

***Source:** OAG photos taken in July 2025*

b) Calibration of equipment to enhance accuracy and reliability of readings

Neither NEMA nor the city authorities had calibrated noise meters, which undermined the reliability, credibility, and admissibility of their measurements. Interviews with NEMA indicated that they rely on the one-year certificates of calibration that they receive upon purchase of the noise meters, with no system to continuously calibrate after the year. The audit also did not find documented guidance on the recommended calibration intervals, although most officers at NEMA and the cities suggested an annual schedule.

Although NEMA had recently procured new noise meters equipped with in-house calibrators, staff reported that they did not know how to operate them. Review of the Uganda National Bureau of Standards (UNBS) documentation and interviews with city environment officers further revealed that UNBS currently lacks the technical capacity to calibrate sound meters locally.

It was further observed that environment officers in Jinja and Arua relied on mobile phone applications such as Sound Meter to record noise levels. However, joint inspections with NEMA revealed significant discrepancies between the noise meters which registered 68-71 dB(A), while the mobile apps recorded 74-82 dB(A), with variations depending on the phone used. Such deviations, far exceeding the acceptable margin of 1-2 dB(A), render these measurements unreliable for official use.

Failure to calibrate monitoring equipment may lead to inaccurate measurements and weak enforcement of noise pollution standards. It may also render NEMA and the city authorities unable to conclusively verify complaints or take evidence-based enforcement actions, resulting in continued violations and unregulated noise emissions.

Furthermore, it exposes NEMA to the risk of litigation and reputational damage, as offenders could successfully contest enforcement actions based on unreliable readings. In one case from Masaka City, a polluter challenged results after the recorded reading was higher when the sound was reduced. In some cities, due to low confidence in uncalibrated meters, officers omitted readings from improvement notices or issued only verbal warnings to avoid legal disputes.

Management response

There is need to increase the number of inspectors on NEMA structure as well as the structure for Local Governments. NEMA conducts trainings in a phased manner depending on the availability of funds.

The proposed noise regulations (currently in draft form) will provide detailed guidance on noise pollution monitoring and enforcement. NEMA has and uses calibrated sound level meters. More meters will be acquired as and when resources become available.

Audit comment

Although management stated that they have and use calibrated sound level meters, review of the only calibration certificate provided indicated that only three meters acquired in March 2024 were calibrated. By the time of the audit, more than one year later, those certificates had expired, meaning that none of NEMA's noise meters were calibrated at the time of the audit.

Conclusion

The available resources including staff, equipment, and skills at both NEMA and the selected cities are inadequate to enable the collection of reliable, credible, and admissible evidence on noise levels and trends for decision making, enforcement, or statutory

reporting. Only six (6) specialist inspectors at NEMA headquarters focus on noise (alongside air quality and noxious smells), while the remaining 124 staff treat noise as a low-priority issue amid competing mandates and vast regional coverage.

In the cities, many of the approved environmental posts remain unfilled, leaving the few officers overwhelmed by multiple responsibilities and unable to conduct night-time inspections due to lack of overtime compensation. Capacity building has been sporadic and poorly extended to city environmental officers, resulting in inconsistent and erroneous measurement practices with varying units, distances, recording methods, and reporting formats that undermine data reliability.

Furthermore, equipment inadequacies are particularly severe: 7 of the 24 sound level meters are faulty, the functional ones have never been recalibrated, and some officers are forced to rely on inaccurate mobile phone apps. This renders the noise measurements unreliable and legally contestable.

Recommendations

1. NEMA and the cities, in consultation with the Ministry of Public Service, should prioritise recruitment and deployment of more dedicated officers for noise monitoring and enforcement, and provide facilitation for after-hours operations.

2. NEMA should institutionalise regular refresher and practical training on noise monitoring, measurement, and enforcement.

3. NEMA should develop and disseminate clear operational guidelines and procedures for noise monitoring and enforcement across all regions and cities.

4. NEMA and the cities should provide sufficient, properly calibrated noise-monitoring equipment to their respective staff to ensure reliable and consistent enforcement.

4.4 Enforcement of noise pollution standards

a) Nature of enforcement action

The National Environment Act Cap.181 mandates NEMA and lead agencies to enforce environmental standards and ensure compliance with environmental laws. Regulations 16(1)(a) and (b) and 17(1) of the National Environment (Noise Standards and Control) Regulations, 2003 empower environmental inspectors and local councils to issue improvement notices, confiscate noise-generating equipment, and prosecute offenders who fail to comply with prescribed noise limits.

The audit revealed that the noise regulations give a lot of discretion to the environment officers to determine the enforcement action to undertake regardless of the seriousness or duration of the offense. The table below summarises the common enforcement actions undertaken by NEMA and city authorities;

Table 14: Differences in enforcement actions taken by officials in different entities

S/N	Entity	Enforcement action taken				
		Verbal warning	**Issuing of onsite inspection reports**	**Improvement notices**	**Penalties including impounding**	**Legal action**
1	NEMA	✓	✓	✓	✓	✓
2	Jinja	✓	×	✓	×	×
3	Soroti	✓	✓	✓	✓	×
4	Lira	✓	×	✓	✓	×
5	Masaka	✓	×	×	×	×
6	Fort Portal	✓	×	×	×	×
7	Mbarara	✓	✓	✓	×	×
8	Hoima	✓	×	✓	×	×

***Source**: Document review, interviews and observations by OAG team*

From the table above, it is evident that verbal warnings (though not very effective) are the most used method of enforcement action. In areas like Masaka and Fort portal, no other method of enforcement beyond the verbal warning was used. It was also noted that all the selected cities shied away from taking legal action against offenders, yet this is one of the available enforcement actions.

As a result, audit noted that the enforcement actions cannot clearly be linked to the need for escalation based on compliance history. As such, the current practice allows for a first-time offender to suffer the same penalty as an obstinate/persistent offender. Audit also noted instances of repeat offenders in Jinja (3 cases), Hoima (2 cases) and Mbarara (1) who kept being issued onsite inspection reports without further escalation despite having a history of non-compliance.

Similarly, the audit noted through field inspections that only one[33] (1) of the sixteen (16) establishments has complied with and taken enforcement actions against noise pollution including verbal warnings, improvement notices and impounding. The 15 establishments, including those whose equipment was impounded, resumed operations (noise polluting activities) immediately, as they hire/purchase alternative sound equipment resulting in persistent noise pollution in the same areas. However, there were no further actions taken on these polluters as guided by the National Environment (Noise Standards &Control) Regulations, 2003.

A case in point is Jinja city where the environment officer advised two (2) complainants to either vacate from their premises or take the noise polluter to court since they had failed to comply with the noise regulations despite the various engagements with the city authority.

Management response

The issuance of onsite reports to repetitive offenders happens when a facility resumes noise pollution activities after being compliant for a period of time. In case of continued non-compliance, fines and prosecution is done.

[33] La Gatos Bar in Kiwatule

When taking the perpetrator to court, the complainant may be called as a witness in court but it is not a requirement under the law that a complainant should be given feedback.

Audit comment

Although management explained that onsite reports are issued to repeat offenders only when a facility had previously complied and then resumes making noise, this is practically untenable because neither NEMA nor the City Authorities conduct systematic follow-up inspections to verify sustained compliance.

Furthermore, while management correctly states that there is no legal obligation to provide feedback to complainants, it remains good practice to inform them of the actions taken in order to demonstrate accountability and restore confidence in the authorities' commitment to environmental protection.

b) Timeliness and evidence-based enforcement

The audit reviewed a sample of 46 complaints recorded by NEMA and the selected cities and established that 13 (30%) were followed up with verbal warnings, meeting with offenders, or issuance of improvement notices, while 33 (70%) had no evidence of inspection or action taken. Details are in **Appendix V.** The audit further established[34] that inspections were conducted between one and five months after receipt of complaints, demonstrating delayed response.

The audit also noted instances of verbal warnings to the offenders, a practice common with all the selected cities, which leaves no formal record of the polluters being warned, the nature of the violations and follow-up actions taken. As such, whereas cities indicated that they had conducted follow-up visits, there was no documentation verifying whether enforcement actions resulted in compliance or sanctions.

Similarly, whereas cities issued improvement notices to the offenders, these were issued without accompanying noise-level measurements which undermines the credibility and enforceability of the enforcement actions. Issuing improvement notices without reliable noise readings and enforcement records complicates follow-up visits, leaves environment officers without evidence to assess progress towards compliance, weakens the basis for enforcement actions, and makes it harder to hold noise polluters accountable.

The shortfall noted above is attributed to the absence of a structured enforcement framework within NEMA and the city authorities. There is no centralized tracking system to identify repeat offenders especially where enforcement action shave been undertaken which prevents continuous monitoring and follow-up.

[34] Through review of the complaints database, inspection reports, minutes of meetings with polluters and improvement notices issued

Management response

Section 11 of the National Environment Act, Cap. 181, places the primary responsibility to manage noise among others on the respective local governments and urban authorities. NEMA comes in to support and provide oversight and handling cases that the Local Governments have not been able to resolve. This oversight and regulatory function is done subject to availability of resources. Regional offices also find it challenging to act timely since they cover a wider scope.

Audit comment

Although NEMA maintains that the primary responsibility for managing noise pollution (among other issues) lies with the respective local governments and urban authorities, Section 9 of the National Environment Act, Cap. 181 empowers NEMA to require performance from, and to hold accountable, the lead agencies, including local governments and urban authorities, for the proper execution of their environmental management mandates.

Furthermore, NEMA remains the principal agency in Uganda for the regulation, monitoring, supervision, and coordination of all environment-related activities implying that environmental management remains a shared role by both NEMA and city authorities.

Conclusion

Enforcement actions undertaken by NEMA and the selected cities are often not evidence-based and are not effective at reducing repeat violations. Many complaints are not actioned on, improvement notices issued often lack supporting measurements, and there is no structured escalation or tracking system, enabling chronic violators to resume operations with impunity and leaving noise pollution essentially unregulated despite statutory mandates.

Recommendations

NEMA and city authorities should;

1. Develop and implement clear enforcement timelines ensuring that responses are prompt and consistent but also establish standard operating procedures for responding to verified cases of noise pollution.

2. Ensure enforcement actions are evidence based and all enforcement actions undertaken are documented to ease follow up.

4.5 Sensitisation and compliance assistance on noise pollution

NEMA[35] and the City Authorities[36] are expected to promote awareness on environmental issues of concern, through sensitisation of the general public and the regulated community. The audit examined whether NEMA and the cities planned for and implemented sensitisation and outreach activities covering noise pollution, its risks, how to identify and report it, and compliance assistance initiatives for the regulated community (polluters).

4.5.1 Sensitisation of the public on noise pollution

Through interviews with the environment officers from all the selected cities and NEMA, and review of sensitisation materials developed and posts on websites and social media channels of NEMA and the selected city authorities throughout the review period, the audit established that there was very limited sensitisation of the general public on noise pollution or how to report it. An analysis of the extent of sensitisation and forms of sensitisations used was undertaken and below is a summary of the findings;

Table 15: Sensitisation on noise pollution via different channels

S/N	Entity	Inclusion of noise pollution in sensitization materials (✓= Yes; ×=No)					
		Printed IEC materials	Radio and TV programmes	Press releases on website	Press releases on social media	Engagement of community leaders	Integration in school environmental education programmes
1	NEMA	×	×	✓	✓	×	×
2	KCCA	×	×	✓	×	×	×
3	Jinja	×	×	×	×	×	×
4	Soroti	×	×	×	×	×	×
5	Lira	×	×	×	×	×	×
6	Masaka	×	×	×	×	×	×
7	Fort Portal	×	×	×	×	×	×
8	Mbarara	×	×	×	×	×	×
9	Hoima	×	×	×	×	×	×

***Source**: OAG review of IEC materials, websites, social media and interviews with Environment officers*

As shown in the table above, only NEMA and KCCA carried out some verifiable sensitisation of the general public on noise pollution, its impacts, reporting channels, and actions taken to combat it. NEMA published press releases on social media (NEMA X handle) and on their website, while KCCA only used their website. In their press releases, both Authorities provided telephone numbers and/ or email addresses for reporting noise pollution complaints (NEMA: Toll-free line: 0800-144-444, email: **info@nema.go.ug;** KCCA: hotline: +256-761 007 800).

The audit confirmed that these channels were operational at the time of audit. However, the channels on which this information is posted (website and X) are not accessible to

[35] Section 147(1)(b) and 147(3) of the National Environment Act, Cap. 181

[36] Section 30(2)(c) of the National Environment Act, Cap. 181

most Ugandans as only 8.9% of persons aged 10 and above, use the internet[37]. Additionally, NEMA raises public awareness by working with media houses to broadcast equipment impounding operations on their television stations and social media platforms.

On the other hand, none of the printed Information, Education and Communication (IEC) materials reviewed or outreach reports developed by NEMA included messages related to noise management, for example, what constitutes noise pollution, channels and procedures for filing complaints (including responsible office(r)s, call lines, email addresses, etc.), and the complaints-handling procedures.

Instead, they focused on topics like waste management, wetlands, land restoration, climate change and plastics. NEMA and the environment officers from all the city interviewed acknowledged that noise is mentioned only briefly during commemorative events such as World Environment Day, or in response to questions during media engagements, but no evidence was provided to this effect. Likewise, district environment officers confirmed that the training manuals used by NEMA for district and community sensitisation neither include modules on noise-pollution control nor procedures for reporting noise complaints.

In the cities, environment officers reported that sensitisation on environmental issues is conducted through barazas, radio talk shows and school visits, but they added that they rarely covered noise.

The limited coverage of noise in sensitisation activities is largely due to the absence of a targeted communication strategy on noise, the lack of deliberate efforts to integrate noise issues into public sensitisation materials, cities' limited use of websites and social media for environmental messaging, and competing environmental priorities.

As a result, many Ugandans are likely to remain unaware of the risks associated with elevated noise levels, the permissible noise levels, reporting channels, and regulations governing noise emissions. This low awareness weakens the feedback loop needed to identify hotspots and leads to under-reporting of violations, leaving many noise sources undocumented and unmanaged.

It may also explain the sharp contrast between the high volume of complaints received by NEMA and KCCA (over 1,000 and 600 annually respectively) and the comparatively low numbers registered by other cities (between 40 and 220 annually).[38] Environment officers interviewed stated that in the absence of formal reporting channels, some citizens report noise pollution via radio stations, in the hope that they will be helped.

Management response

Awareness and compliance assistance has always been offered through radio and TV talk shows, during inspections and community engagements in both English and local

[37] National Population and Housing Census Report 2024

[38] Estimated number of complaints received, based on document review and interviews with Environment officers

languages. Noise pollution is embedded in NEMA's communication strategy and forms part of routine environment awareness conducted by NEMA.

Audit comment

Whereas NEMA indicated that noise pollution has been embedded in its communication strategy[39], a review of the strategy indicated that noise is not mentioned as a particular aspect but rather as part of the general environmental issues to be focused on. Moreover, the communication materials produced by NEMA do not include aspects of noise pollution. NEMA did not provide evidence that they conducted noise sensitisation on radio talk shows, during inspections or community engagements.

4.5.2 Compliance assistance to the regulated community (Polluters)

Through review of annual and quarterly work plans, and performance reports for the years under review, the audit established that NEMA conducted only one compliance assistance engagement (2022) with the leadership of the born again Churches. The report from that engagement indicated requests for additional sensitisation on noise pollution standards, yet no follow-up activities have been undertaken.

Other than this initiative, NEMA has neither planned nor implemented a programme to provide compliance assistance to other noise polluting entities such as bars, churches, and industries. A review of enforcement and monitoring reports indicated that interactions between NEMA and polluters occur mainly during inspections and enforcement operations, where officers issue verbal guidance and warnings. However, there were no scheduled consultative meetings, workshops, or advisory visits held to support these entities in identifying corrective measures such as installation of soundproofing technology, noise barriers, or adjustment of operating hours.

The audit further established that NEMA does not maintain records of follow-up meetings and did not provide evidence of compliance agreements signed with noise polluters, giving them specified timelines to put in place particular mitigation measures. As a result, enforcement remains punitive, with polluters being fined or having their equipment impounded without complementary technical guidance to enable sustainable adherence to the permissible limits.

At city level, the audit found evidence of consultative meetings with bar owners only in KCCA and Lira City, which held two and one meeting respectively to support compliance following identified violations. KCCA also provided noise limiters to willing facilities, at a fee, as a more affordable alternative to soundproofing (approximately UGX.10Mn versus UGX.150-300Mn, according to facility owners). The limiters automatically switch off the sound once pre-set levels are exceeded and send notifications to both the facility owner and KCCA. However, uptake remained low, with only one[40] facility having installed the limiter as many owners still considered the cost prohibitive.

[39] 2023-2026
[40] La Gatos Bar

Review of complaints from six cities[41] (Soroti, Mbarara, Hoima, Lira, Kampala and Jinja) and interviews with environment officers from all the sampled cities revealed that city authorities primarily rely on issuing improvement notices and warnings without conducting subsequent advisory engagements. The team noted the case of a bar (La Gatos) in Kiwatule where despite the bar's efforts to install soundproofing after enforcement action in 2024 and repeated requests for verification of compliance in 2025, NEMA had not conducted the follow-up inspection by October 2025, and had not released the equipment impounded from the same bar.

Furthermore, the majority of noise polluters across all inspected cities demonstrated limited awareness of noise standards, permissible limits, or available tools (such as noise meters and mobile sound level apps) as shown in the table below.

Table 16: Compliance assistance and knowledge gaps among facility owners interviewed

Location of premises visited	Compliance assistance and Knowledge gaps reported
Kampala	• General lack of awareness about permissible noise levels and standards, noise meters and limiters in all places visited; • Delayed regulatory follow-up to verify improvements made after enforcement, and return confiscated equipment (La Gatos).
Jinja, Soroti, Hoima, Fort Portal, Mbarara	• All unaware of permitted sound levels, sound meters and limiters.

***Source**: Field inspections and interviews with the polluters*

The absence of structured engagements with polluters has led to repeat violations, as establishments continue to operate without clear understanding of compliance requirements. Additionally, city plans and budgets did not include provisions for compliance-assistance activities or timelines for verifying implementation of corrective actions.

Conclusion

Public sensitisation on noise pollution was extremely limited and was carried out only by NEMA and KCCA through occasional website updates and social media posts that included reporting hotlines. The other seven cities undertook no sensitisation activities at all throughout the review period.

Compliance assistance was similarly unstructured and unplanned, with NEMA, KCCA, and Lira each conducting only one engagement during the entire period under review. As a result, the general public remains largely unaware of noise standards and reporting channels, polluters continue to lack essential knowledge on how to maintain admissible noise levels, violations recur frequently, and authorities rely excessively on punitive measures that fail to achieve lasting noise pollution reduction.

[41] Save for Masaka and Fort Portal where no improvement notices are issued.

Recommendations

NEMA and the city authorities should;

1. Develop and implement a targeted communication strategy/mechanisms on noise pollution that integrates clear, accessible messages into all sensitisation channels to raise public awareness of permissible noise levels, reporting and noise-handling procedures, and enforcement actions.

2. Strengthen their compliance assistance efforts by establishing structured and continuous engagement with noise polluters through awareness programmes, advisory visits, and follow-up inspections. This should include educating the regulated community (polluters) on noise standards, permissible limits, and available monitoring tools to promote voluntary compliance rather than relying solely on punitive enforcement.

4.6 Coordination between stakeholders on monitoring and enforcement of noise pollution standards

Section 9(2)(d) of the National Environment Act (NEA), Cap. 181 mandates NEMA to coordinate and collaborate with lead agencies in integrating environmental concerns into national and sectoral plans, while Section 9(2)(k) requires it to undertake and coordinate environmental monitoring, inspections, and compliance audits.

As the lead environmental agency, NEMA is required to work with other institutions to ensure consistent and effective monitoring and enforcement of noise-pollution standards. Effective coordination should aim to minimise duplication, fragmentation, overlap, gaps or contradictions between key stakeholders and synergise their strengths to improve efficiency and effectiveness.

The audit noted several positive coordination efforts by NEMA. The Authority has established strong working relationships with the Police and UPDF, who have seconded officers to support its monitoring and enforcement activities. During the review period, NEMA also provided periodic training to city environment officers that covered aspects of noise pollution management (the gaps in 4.3.2 and 4.4 (b) not withstanding) and frequently offered direct support to cities during enforcement operations when called upon.

In addition, the Authority often involved local council chairpersons and the Police when issuing improvement notices, enhancing the effectiveness of its enforcement actions.
However, the audit also noted the following weaknesses in coordination between NEMA and other stakeholders in the monitoring and enforcement of noise pollution standards;

Mix-up of roles

Inspectors are the technical officers responsible for monitoring and enforcement of noise pollution, while Environmental Police provides security and enforcement support.

In Jinja and Fort Portal, Police officers were noted to be taking sound level measurements, a task that falls within the mandate of environmental inspectors and yet these police officers had not been trained or gazetted as environmental inspectors.

This mix-up of roles undermines established procedures for evidence collection, as police officers lack both the mandate and technical expertise to conduct accurate sound measurements. Consequently, readings taken by unqualified officers' risk being discredited or dismissed in court, weakening enforcement efforts and compromising the credibility of noise monitoring results.

Conflicting enforcement objectives

The audit identified weak harmonisation of objectives between revenue generation and environmental protection. Although NEMA and city authorities are expected to collaborate with revenue and licensing departments to integrate environmental considerations into the licensing process, this coordination was inconsistent across the selected cities. In practice, licensing and renewal decisions often prioritised revenue collection over environmental compliance.

As such, when business premises changed their use or purpose, for example, from a restaurant to a bar or live-band venue, existing licenses were rarely reviewed or revoked, largely to avoid revenue losses for the cities. Consequently, many noise-generating establishments continued operating without restriction, while previously compliant businesses easily transitioned into unauthorised, high-noise operations.

This trend was particularly evident in Kampala, Lira, Jinja, and Mbarara, where restaurants and bars located in previously quiet residential neighbourhoods such as Kololo, Bugolobi, Kiwatule, among others have become sources of constant disturbance, driving residents to distress and, in some cases, legal action. Many of the noise complaints filed with NEMA from Kampala relate to such cases.

Monitoring and reporting on noise pollution

The audit noted a significant coordination gap between NEMA and the city authorities regarding monitoring, reporting and information-sharing on noise pollution. NEMA did not adequately follow up with the cities to ensure that quarterly reports including information on noise monitoring and enforcement were submitted as required by section 9 of the National Environment Act. Audit was only provided one report submitted to NEMA by Jinja City in October 2022. City environment officers interviewed indicated that they mainly report to their respective city technical committees and Accounting Officers, to whom they are directly accountable.

Even the one report submitted to NEMA lacked critical, evidence-based details, such as data on noise hotspots, sensitive areas, enforcement actions, and progress made. Despite these gaps, NEMA did not actively engage the cities to remind them of their reporting obligations or to provide guidance on improving report quality.

Consequently, NEMA lacks a clear and up-to-date understanding of the actual state of noise pollution management across the country, weakening its oversight and coordination role. Furthermore, Audit noted six instances where NEMA and the city authorities applied the same or more lenient enforcement actions to an offender rather than escalating them, because they were unaware of past visits and enforcement actions by their sister authorities.

In two cases, both NEMA and KCCA impounded equipment on separate dates, after which NEMA later issued more lenient improvement notices. In four other cases, both entities issued improvement notices during different inspections of the same offenders. Details are presented in **Appendix VI.**

Management response

The Accounting Officer explained that the National Environment Act, Cap. 181 already requires cities to report to NEMA on how they have managed environment in their respective jurisdictions. The Noise Regulations under revision will streamline roles and reinforce the provisions of the National Environment Act, Cap. 181 on reporting by Lead Agencies.

Audit comment

Although the National Environment Act, Cap. 181 indeed requires cities to submit reports to the Authority, compliance remains low, as evidenced by the very few submissions received. Furthermore, even in the reports that are submitted, details relating to noise pollution are consistently omitted.

Recommendations

NEMA should:

1. Strengthen inter-agency coordination by clarifying institutional roles;
2. Enforce regular reporting from cities on noise trends and interventions; and
3. Engage city authorities on the necessity of aligning licensing practices with environmental objectives to ensure consistent and effective noise management.

OVERALL AUDIT CONCLUSION

While some progress has been made in monitoring and enforcement of noise pollution standards by NEMA and selected cities, the efforts remain largely reactive, under resourced and poorly coordinated. The absence of structured systems for identifying and prioritising noise hotspots, tracking complaints, and enforcing standards, combined with inadequate staffing, limited public awareness and weak stakeholder coordination undermines the effectiveness of the current interventions. As a result, the systems in place are not yet sufficient to achieve sustained reductions in repeat violations or adequately address community complaints.

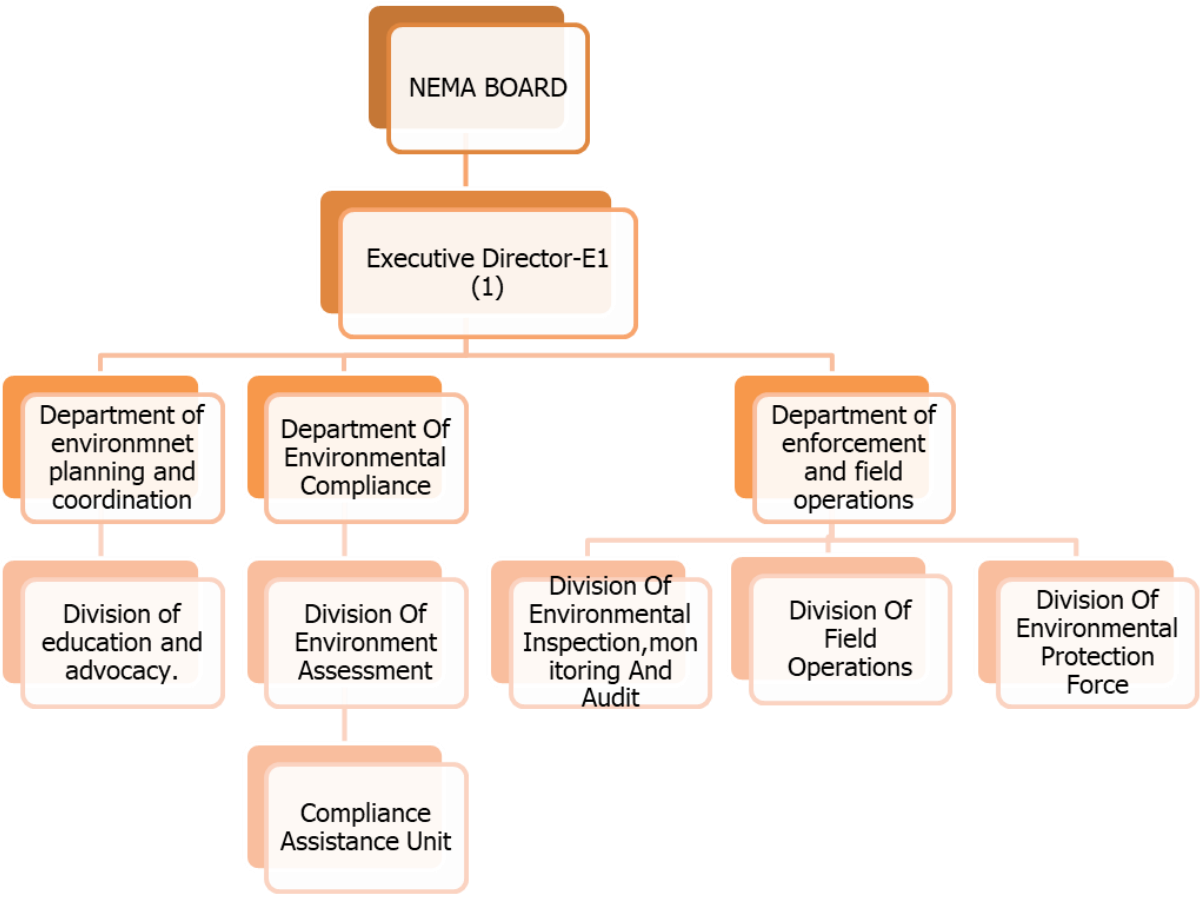


Edward Akol
AUDITOR GENERAL
KAMPALA

15th December, 2025

APPENDICES

Appendix I: Organisational Structure



Appendix II: Documents reviewed

S/N	Documents reviewed	Purpose for review
1	Government Constitution	To obtain constitutional provisions regarding the rights of Ugandans to a clean and healthy environment
2	National Development Plan III and IV	To understand government priorities with relation to noise pollution monitoring and enforcement
3	Agenda 2030	To review the global goals including SDG 3 - ensure healthy lives and well-being for all at all ages and; SDG 11- Make cities and human settlements inclusive, safe, resilient and sustainable.
4	Vision 2040	Guiding the transition to a middle-income status country and achieving SDGS
5	National Environment Act.	To know NEMA's mandate in relation to noise pollution monitoring and enforcement
6	National Environment (Noise Standards and Control) Regulations, 2003	To assess whether the set regulations are adequate and comprehensive, covering all aspects of monitoring and enforcement of noise pollution
7	NEMA strategic plan, Annual plans and annual budgets	To examine activities, targets and objectives set with regard to noise pollution monitoring and enforcement.
8	Performance reports and National state of the environment reports	To examine monitoring, evaluation and reporting activities on noise pollution standards

Appendix III: Persons interviewed

S/N	Person(s) Interviewed	No. of persons interviewed	Purpose of the interview(s)
1	Staff from NEMA's Department of Enforcement and Field Operations (divisions of; Environmental Protection Force, Field operations, and division of Environmental Inspection, Audits and monitoring),	8	• To understand the interventions and activities done by NEMA in regards to monitoring and enforcement of noise pollution standards.
2	Staff from NEMA's Department of environment compliance	4	• To gain insight into the government's policies and guidelines instituted to manage noise pollution standards in Uganda
3	Staff from NEMA's Department of environmental planning and coordination (division of education and advocacy)	4	• To understand the mechanisms used to sensitize the community about noise pollution.
4	Staff from NEMA regional officers for Mbale, Lira, Hoima and Mbarara including Senior Environment Officer, Principal Environment Officer, NEMA Regional Manager, environment protection officer and Investigations officer).	17	• To understand the interventions and activities done by NEMA regional offices in regards to monitoring and enforcement of noise pollution standards.
5	Environment/Natural resource officers for the selected cities	8	• To understand noise control practices, strategies and challenges in the various local governments.
6	KCCA		• Gain an understanding into the Authority's interventions, plans, partnerships, successes, challenges, and performance in noise monitoring and enforcement.
6	The regulated community (polluters)	38	• To understand why they fail to comply to the noise pollution standards.
7	The general public/ complainants	33	• To gain insights on the actions undertaken by NEMA and the cities for monitoring and managing noise pollution.

Appendix IV: Roles and responsibilities of key players in monitoring and enforcement of noise pollution

S/N	Stakeholder	Roles
1	Department of environment compliance.	• Develop comprehensive policies and guidelines for monitoring and enforcement of noise pollution standards. • Plan and budget for monitoring and enforcement activities in the country.
2	Department of environment enforcement and field operations. (divisions of; Environmental Protection Force, Field operations, and division of Environmental Inspection, Audits and monitoring)	• Monitors and enforces noise pollution levels in line with the set standards in the country. • Conducts inspections like noise inspection. • Permits for emitting excessive noise. • Oversees all activities conducted by regional offices and collaborates with other law enforcement agencies in environment management to strengthen enforcement of environmental laws and regulations.
3	Department of environmental planning and coordination (division of education and advocacy)	• Sensitize the community about noise pollution. • Capacity building for the lead agencies.
4	Cities /LGS. (physical planning department, Natural resources department, commercial department)	• To enact policies/ordinances for monitoring and enforcement of noise pollution levels in the cities/LGs. • To promote environmental awareness. • To ensure compliance with permits/EISA certificates and to notify the Authority, as appropriate. • To assist in the preparation and approval of environment action plans. • To assist in the preparation of the lead agency state of environment report; • To monitor all activities within their jurisdiction to ensure compliance with the NEA. [42] • To participate in enforcement activities within the cities
5	Bars/places of worship/ industries/Crusade or party organisers.	• To coordinate with NEMA and LGS to maintain their noise levels within the permissible limits, and to collect data on to aid monitoring and enforcement of noise pollution standards in accordance with the certificates.
6	Environmental Protection Police Unit (EPPU) under Uganda Police Force.	• Provide protection to the environment officers during the monitoring and enforcement activities.

[42] Acts and regulations: Compendium of NEMA related laws.

Appendix V: Action taken on complaints recorded by NEMA and the cities

SN	Date of complaint	Nature of complaint	Complainant	Location	Action taken
1	-	Noise from Fradoc bar (formerly Climax Bar)	Residents	Soroti	None
2	14.05.2024 and 02.04.2025*	Noise from Arrows bar	Hoima Resort Hotel and a neighbouring resident	Hoima	Improvement notice issued
3	22.08.2022*	Excessive Noise at Lovinar bar, Vibez bar and Embassy bar	Lydia Lyazi	Jinja city	Meeting with offender
4	22.07.2024*	Noise pollution from royal bar (Kutch road west light)	Bellevue Hotel LTD	Jinja city	None
5	22.02.2024	Noise Pollution from Skypes Bar	-	Soroti City	None
6	26.03.2025*	Mungano petrol station night club	Wanyange central community	Jinja City	Formal warning
7	21.08. 2024*	Heavy noise from 3 competing open-air clubs (Arrows bar, KATS lounge bar and vintage lounge bar	Hoima Resort Hotel LTD	Hoima city	None
8	15.03. 2023*	Omuhereza Nteemu Metal Workshop Hoima	Kagadi people's secondary school. Hoima city	Hoima city	Stop order written by NEMA
9	11.05. 2022	Jakana pub and take away.	Kayirikiti community. Masaka	Masaka City	Verbal warning
10	20. 06. 2025	Classic inn bar	Concerned citizens.	Masaka	Verbal Warning
11	01.07. 2022	Joy revival church. Mbarara	Residents of Rwebikoona cell, Kamukuzi division	Mbarara city north	Improvement notice
12	03.03. 2025*	Noise from Holy spirit church	Vine inn	Mbarara city	Improvement notice
13	05. 05 2025	Music and film library	Link suits	Mbarara city	Verbal warning
14	-	Leisure Park	Compalints from residents	Soroti City	Improvement notice
15	04. 12. 2024	Noise pollution in Rubaga by Taxern wood bar	-	Kabuusu	None
16	13. 12. 2024	Noise pollution at faith church	-	Kirombe Luzira	None
17	15. 01. 2025	Noise pollution by universal church	-	Kikoni makerere	None

SN	Date of complaint	Nature of complaint	Complainant	Location	Action taken
				near internatio nal hostel	
18	29. 01. 2025	Noise pollution by a generator at Stabex	-	Kyebando central division	None
19	22.02.2024*	Noise from Nile resort hotel	Mto Moyoni retreat centre	Jinja	Complain ant satisfied
20	22.08.2022	Noise from Vibes Bar and embassy bar.	Lydia Lyazi 0754574139	Plot 41 and Plot 43 Iganga road Jinja	None
21	02.03.2022	Noise from Mungano Stabex petrol station	Uthman Mwanje 0750145203. Nabilye Halima 0701133306	Jinja	Violator complied by reducing the music. Complain ant satisfied
22	29.07.2024	Video Hall on Leisure Park	Complaint by a neighbour	Sir Tito Winyi Road, Hoima City	None
23	11.12.2023 and 20.01.2024*	Noise from Ocean Lounge	Night Rose Hotel	Fort Portal	None
24	13.05.2022	Noise from Jakana pub & takeaway	Hissa Majidu 0701374624 Fred Kakooza 0704644585	Kayirikiti cell-Nyendo ward (Masaka)	None
25	20.06.2025	Noise from Neighbours Classic Inn Bar	0752238405/ 0751119340	Kisajjagir wa-Nakayeng a (Masaka)	Action taken and problem solved
26	15.11.2023	Noise from Kajana Co. Ltd (stone quarry)	Obote Silvano 0773535047 0753819422	Anyangap uc ward-Ngetta (Lira)	None
27	06.03.2023	Noise pollution by Arena bar	Town clerks' office	Ghokale Road (Jinja)	None
28	18.07.2023	Noise emission & road blockage by Paradise spot	Occupiers of plot 68,Ghokale road (Thru	Plot 68 Ghokale Road (Jinja)	None

SN	Date of complaint	Nature of complaint	Complainant	Location	Action taken
			Okalang Law Chambers)		
29	30.01.2023	Noise from a bar	Ahimbisibwe James	Lubowa road Kireka	None
30	30.01.2024	Noise from Global Faith Church	Derek Jude Kasana	Bunamwaya Ward	None
31	14.01.2024	Noise from 2 bars	Adolf Mwesigwa	Kabalagala Nsambya	None
32	11.03.2024	Noise from bar Sam's lounge	Hope estate	Kasangati Town Council	None
33	28.03.2025	Noise from a bar and church	joseph mulindwa	Seguku Kitale	None
34	17.03.2023	Noise from a bar	kasabangali residents	Kasanbangali Village	None
35	07.03.2024	Noise from the bar	Ssali john	Bunamwaya Nsangi	None
36	11.04.2025	Noise from Lost Boyz bar	Jane Denise	Kitoro Entebbe	None
37	26.04.2024	Noise From a brick making factory	Lutwama Godfrey	Namawajjollo west	None
38	30.01.2023	Noise from liquor shade bar	Meera investments	Kira road	None
39	06.03.2025	Repeated noise from local bars	Musana Emmanuel	Kinawataka Mbuya	None
40	29.02.2024	Noise from bars, hotels and health clubs	Mutesasira Zone residents	Mutesasira Zone	None
41	17.01.2023	Noise pollution from the lounge bar	Mutesasira zone residents	Mutesasira Zone	None
42	25.01.23	Noise from church speakers(last reminder)	Namagoma b cell residents	Namagoma b	None
43	08.09.23	Noise from a church	Patrick kalunda	Namalere kawanda	None
44	01.04.25	Noise from the church	Annet N	Akram apartments	None
45	08.04.25	Noise from a church in the name of prayer	Nanyonjo Sophie	Ndejje	None
46	16.04.2024	Noise from a neighbouring bar	Rahid mande	Kamwokya	None

** Complaint received more than once*.

Appendix VI: Instances of Uncoordinated Enforcement Actions by NEMA and KCCA

SN	Facility	Date of first inspection by NEMA	Action taken by NEMA	Date of first inspection by KCCA	Action taken	Date of second inspection by NEMA	Action taken by NEMA	Date of second inspection by KCCA	Action taken by KCCA
1.	Tales lounge	15th January 2023	Issued improvement notice	25th January 2025	Equipment impounded	22nd August 2025	Equipment impounded	2025	Received an improvement notice
2.	Catwalk bar	30th September 2022	Improvement notice	2025	Improvement notice	N/A	N/A	N/A	N/A
3.	Banana bar and lounge	8th April 2022	Improvement Notice	2025	Improvement notice	N/A	N/A	N/A	N/A
4.	Volt Arena	16th June 2022	Improvement notice	2025	Improvement Notice	N/A	N/A	N/A	N/A
5.	H_2O Bar, Lounge and Restaurant	30th September 2022	Improvement notice	2025	Improvement notice	N/A	N/A	N/A	N/A
6.	La Gatos Bar	November 2024	Impoundment	25th January 2025	Impoundment	October 2025	Improvement Notice	N/A	N/A

Office of the Auditor General

Audit House,Plot 2C Apollo
kaggwa Road,
P.O.Box 7083 Kampala.
041-7-336000,
info@oag.go.ug,
www.oag.go.ug
@OAG_Uganda