

“A Difficult Lady”

Shutting Down Pollution in Kampala, Uganda

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In the early morning hours of May 23, 2012, environmental safety inspectors from the Kampala Capital City Authority (KCCA) in Uganda approached armed guards outside the city’s largest employer, a petrochemical factory called Mukwano, flanked by roughly sixty law enforcement officers. A young wastewater sanitation inspector, Pamella Ndagire, prepping the team for the action, had warned, “They will be in your face; they will say whatever they have to say.”¹ But, she insisted, “No matter what, we are professionals. No matter who is going to insult you, no matter what they say to you, you do not say a word back.” It fell to the inspectors to make the message from Dr. Judith Tukahirwa Tumusiime at the KCCA clear to the firm’s private security officers: the factory is closed, effective immediately. “If you prevent me from executing my job,” the inspectors explained, in the local Bantu dialect, “you’re going to have your own case to deal with. Your job is to make sure I’m not ruining any property. I’m not trying to do anything to affect the business. I’m just here to do my job.”

The Gravity of the Problem

Environmental and sanitation inspectors in Kampala had their work cut out for them. In the lakeside capital of the country Winston Churchill once called “The Pearl of Africa,” living and working conditions could be dire. The city’s infrastructure had not seen major investment since the 1980s, when the local population hovered around 600,000.² By 2010, when parliament passed the Kampala Capital City Act—dissolving the Kampala City Council and establishing the KCCA as a politically independent administrative authority—the city had around one and a half million residents, with millions of additional people flowing in to work each day.³ Sixty percent of Kampala’s residents lived in urban slums, mostly without access to piped water.⁴ Sanitation workers collected only about a third of the solid waste the city produced each day. According to the World Health Organization, Kampala ranked 15th in air pollution worldwide and was the most polluted city in east Africa.⁵

The corruption and ineffectiveness of the former Kampala City Council had contributed to a local culture of lawlessness around waste disposal and pollution. “Oh my gosh, there was a lot of impunity,” Tumusiime recalled.⁶ There were good laws on the books, but “there was no compliance at all. In addition to the trash, you had pollution—both air effluence and sewage from industry. Everything was free flowing in the city. There were flies everywhere.” Tumusiime, who had work experience with the National Ministry of Water and Environment, knew that the problem went deeper than the visible filth. “I was in charge of monitoring the water quality for the wetlands in Kampala and in other urban centers. The level of pollution was so high. Ugandans’ lives were at risk. I knew the consequences. I knew the gravity of the problem.”

Jennifer Musisi, the former head of legal affairs for the Uganda Revenue Authority, was President Museveni’s choice to lead the KCCA. She put waste management at the top of her list of areas in need of immediate attention: “We were affected by epidemics, outbreaks—cholera, dysentery, a lot of malaria. The city looked unsightly. There was a lot of garbage piled up, and that had been going on for a long time.”⁷

At a friend’s suggestion, she met with Tumusiime, who held a PhD in urban sanitation and solid waste management. The meeting confirmed their shared vision for a cleaner Kampala, but Musisi explained that she did not yet have an approved budget to pay a team and begin the KCCA’s work. In spite of this, Tumusiime simply showed up to work one day, waving off Musisi’s concerns that she might not be able to pay her for months. The two agreed she would come on as a consultant. Her first charge, according to Musisi, was to “clean up the city and organize the workers and the citizens to support a cleaner city.” This was the opportunity Tumusiime had been waiting for since returning to her home country from her advanced studies in the Netherlands, and Tumusiime was the partner Musisi needed to bring the technical know-how to the KCCA. “From the word go,” Musisi said, “we were like, ‘Yay! Let’s do this!’”

Who’s in Charge?

Arguably, the most significant single source of pollution in Kampala was the Mukwano Industries factory. Perched on a hill in a central location, just across the Nakivubo channel from the offices of the National Environment Management Authority (NEMA), the factory was the largest employer in the city, run by one of the most powerful and politically connected families in the country. (See Appendix for a satellite view of the area.) Grace Birikadde, an officer for NEMA, explained, “My office was directly opposite the plant. You come into work in the morning, and the whole place is covered—even the office—covered with soot.”⁸ The factory, which manufactured products ranging from detergents to cooking oils and energy drinks, had a long history of violations. “Looking into the file,” Birikadde said, “I found that the previous officers had consistently identified noncompliance—especially to do with wastewater discharge as well as air pollution. Consistently. They didn’t have a wastewater treatment plant. They didn’t have air pollution control equipment. The whole city was covered under smoke.”

People living and working in the vicinity had filed complaints, organized, and petitioned for relief from the onslaught. Now and then, company spokesmen promised changes were forthcoming, but nothing changed. The factory continued to burn sawdust all night long to fuel its machinery, and to discharge industrial and human wastewater into the Nakivubo channel all day, which flowed directly to Lake Victoria. “Downstream, you would get complaints from the fishermen, that they’re getting colored water. You have ferries coming from the islands to the mainland. They would complain about the stench from the water,” said Birikadde. “That part of the lake, Murchison Bay, has completely died.” The National Water and Sewerage Corporation, which drew water for consumption and irrigation from the lake, complained about the skyrocketing costs of water treatment. Children in the slums below the factory were living with or dying from respiratory illnesses.

The environmental protection bureaucracy in Uganda, a nation with breathtaking natural beauty and resources, was labyrinthine. NEMA operated under the Ministry of Water and Environment but had a legal mandate to oversee the country’s entire environmental bureaucracy: monitoring and auditing

performance; coordinating environmental agencies; assisting in capacity building at the national and local level; and enforcing all applicable laws. “You have oversight of the industries—the processing industries, and of the ecosystems like wetlands and forests and so forth and so on,” explained Birikadde, “but you find other agencies, like the National Forests Authority, the Wetlands Management Department, even local governments—like the KCCA—that have almost the same powers. You have roles that are duplicated, and you find that you don’t have any institution that’s actually in charge.” Moreover, most of these environmental management organizations simply lacked the human and technical capacity to carry out their monitoring and enforcement mandates. Between political interference, jurisdictional conflicts, and inadequate staffing, it seemed the buck stopped nowhere.

“Everything Has to Be Professional”

After joining Musisi and her small team at the KCCA, Tumusiime’s portfolio expanded rapidly. “I came in as a solid waste management consultant. But because I was doing this work, and I was out in the field, I was working with more or less everyone—staff from public health, engineering, physical planning, and gender directorates, everyone,” she explained. “I sort of naturally took on the role of oversight for all these departments and directorates because Jennifer was busy trying to fight corruption, and build the new institution, and look for funding.”

Still officially employed as a consultant, Tumusiime’s responsibility was to supervise the areas of waste and sanitation, public health and environmental management, engineering, education, gender and youth issues, and community development. “It was a very, very busy job for her,” Musisi acknowledged. “It was putting in place systems,” said Tumusiime. “We had systems that had been broken down.” Collection of city fees and taxes was outsourced to private actors who dealt in cash and kept shoddy records. Musisi leaned heavily on her experience in the Uganda Revenue Authority as well as her legal training to root out corruption, raise revenue, and create some semblance of order. “There were very good laws and ordinances that were never implemented,” she explained. “There was no strategy for the city. So, we were developing the strategies, we were coming up with a mission, a vision, values, and also putting in place teams—competent teams of really passionate people of high integrity like we were.”

One of the people who joined the waste and sanitation team early on was Pamella Ndagire, who had recently returned to Uganda after completing studies in wastewater treatment and management at San Diego State and working for two years in Rwanda, because “for a while, I couldn’t get a job in my home country. There are not that many females that do this, especially at home.” She had a rocky start at the KCCA. “When I first came into the office,” Ndagire recalled, “I was going to meetings with male colleagues and being discussed like I was a piece of jewelry that had been brought to the meeting to make it look nice. I went home every day crying.” Seeing what was happening, Tumusiime offered support. “She knew what kind of intimidation I was getting,” Ndagire explained. “People were telling me, ‘That’s not how things work here. You can’t do this.’ She kept telling me, ‘Just ignore all the noise. I want you to own your space. I know what you can do. Come in here and we can talk about exactly how to go about things. I’m behind you, 100 percent.’”

Tumusiime paired Ndagire with a senior inspector who had a reputation for integrity but held some of the same problematic attitudes towards women as his colleagues. “The first day I worked with him,”

Ndagire said, “he treated me exactly how the other guys had been treating me. The only difference was it was just me and him, and I was able to tell him, ‘This is not going to cut it.’ This is about work—the way we speak to people, the way we present ourselves in public when we go to talk to somebody in the community. Everything has to be professional.”

Ndagire’s admonition improved her interactions with her colleague, but professionalism on the part of the inspection team could only get them so far. “The way things work in Uganda or Kampala is that, of course, as a business, you have to present certain licenses to operate,” Ndagire said. But, she explained, the rules did not apply equally to everyone: “When we started out, everyone had somebody on call for everything: ‘You need my license for what? No problem.’ They knew exactly who to call in the office to make it go away. We always presented our names and our title, but they’re not getting your names to say to the bosses, ‘This is the person that came by, and these were the instructions.’ They’re getting your names to call the people on their call list. Then they’re going back to your own people, your own colleagues, and saying, ‘This person is at my door,’ and your own colleague says, ‘Don’t worry about that person. That person will go away.’ The problem was, I’m not that person. Their person could promise them until I don’t know what day that I’m not going to come back. I was always going to come back.”

Tumusiime gave Ndagire and her partner a team of eight to ten enforcement officers. “You have to come with a presence,” Ndagire explained. “Not as intimidation, but to have your back during the inspection, so that we could carry out our tasks without anybody interrupting.” Even with enforcement behind them, though, it was frustrating and sometimes dangerous work. Before the inspection team went out into the field to respond to a complaint or do routine monitoring, Ndagire explained, they would consult with the enforcers: “If it was a tough part of the city, the enforcement lead would come in and talk to me: ‘I know you told me this is your schedule, but this place we have to go to tomorrow at 8 am. We can’t go to this area of the city past 10 am.’” At other times, however, the inspectors would take care to withhold the target of an investigation from members of the enforcement team and other coworkers to avoid tip-offs. “Sometimes it was easy. Sometimes you gave somebody a notice, and maybe they called their person, and the person would tell them, ‘Unfortunately, you’re going to have to do what they say.’ Sometimes the person pushed back, and even went as far as going to jail, and then paid all that bail money just to come back and fix the problem.”

Going for the Big Fish

Part of the enforcement strategy at the KCCA, in all realms, was to make an example of the most visible, high-profile offenders. Bank officers and restaurant managers were sent to jail or ordered to perform community service when they were caught littering.⁹ Hotels and corporations were targeted for the collection of back taxes. This approach was not without personal risk to Muisi and her team. Months before Muisi had an approved budget or had even collected a paycheck, she was subject to threats on her life. A grenade was found under her car.¹⁰ A plot to poison her was discovered.¹¹ Nevertheless, Muisi and her team persevered, sometimes working upwards of twenty hours a day. The culture at the KCCA was set at the top. There would be no tolerance for corruption, no favors given, and no backing down.

Tumusiime worked for many months to engage executives from Mukwano. “We invited them for meetings,” she said. “We wrote administrative letters trying to encourage them to really try and address the issues because they were very obvious.” Once or twice, Mukwano sent some junior employees over to meet with Tumusiime and offer assurances that they were making improvements, but at the end of the day, Tumusiime said, “The leaders didn’t care.” Musisi explained, “They were like a lot of the other wealthy members of the society. A very wealthy, very well-known family with a lot of investments in industry, in agriculture, manufacturing, and real estate in the city. They thought it would be business as usual. The government saw them as a critical contributor to the economy. Their businesses created jobs for a lot of people.” But working conditions in the factory were grim. There were just a few toilets available for a workforce of over 2,000, and even these were mostly unusable. “It was ridiculous,” said Ndagire.

It was a complaint from a worker that brought Ndagire to the factory for the first time, after only a couple of weeks on the job. Just walking around the premises, the inspectors could see multiple serious violations. Ndagire and her partner asked to speak with the environmental officer, but the receptionist said he was not available and offered to deliver a message. “We told them exactly what our issue was, showed them, this is what we've seen, and this is what needs to be worked on,” said Ndagire. They told the receptionist that the factory had one month to show they were making meaningful improvements or risk being shut down. Two weeks later, they returned to check on progress and again were told nobody was available to speak to them. On their third visit, at the one-month mark, guards headed them off at the gate: “We were actually barred from entering and we were escorted off,” Ndagire said.

“My team was as frustrated as I was,” said Tumusiime. “I needed to support them as a leader.” The KCCA had shut down smaller businesses for failures to comply. The same standards had to apply to Mukwano. Tumusiime went to the KCCA’s legal team and asked if she had the authority to shut down the plant. They confirmed that she did. The inspection team’s report that they had been barred entry to the premises and prevented from executing their duties alone was legal grounds for closure. Tumusiime resolved to shut the factory down. How to do so as a practical matter was another question.

A Risky Action

It was not the first time anyone had considered shutting down the factory. Inspectors at NEMA like Birikadde had sought or recommended closure notices after their timelines for improvements were repeatedly ignored, only to have their supervisors shake their heads and tell them to write another strongly worded letter. In late 2010, NEMA’s deputy director had issued a letter ordering the facility to stop discharging pollutants into the channel and create safer conditions for workers. The national environmental inspectors, responding to complaints about contaminated water from a nearby car wash station, had found dead zones in the wetlands downstream from the factory and observed raw sewage flowing from the factory and contaminating local water supplies. Since 1998, NEMA had required factories to conduct environmental audits, but Mukwano had never done so.¹² The head of the company had personally warned Birikadde to back off, and he did: “I didn’t have a conducive environment. Within the institution, people realized that one, KCCA was taking over from NEMA in that area. But two, there were guys in the Ministry who were friends with the boss.”

The attitude everywhere seemed to be that Mukwano was untouchable. Ndagire recalled, “No matter who you spoke to, every single person, supervisor, director, said, ‘Just leave them alone. Are you crazy? No, you can't do it.’” Her partner, the senior inspector, had told her, “You don't understand. My whole career, every single time anybody has brought up a complaint, everybody just tells me, ‘Forget about it.’”

“They threatened everyone,” said Tumusiime. “They said they had the backing of the president. Everyone feared them.” Their attitude, according to Tumusiime, was that she was just the newest pest coming to bother them: “She’s just new in the city. We’ve been here.” Tumusiime laughed, exclaiming, “I was born in that city!”

At the time, though, it was no laughing matter. In addition to the threats against her and her colleagues at the KCCA, and the very real possibility of the factory guards firing on her enforcement officers when they attempted to close the facility, there were the thousands of factory workers who would go without wages while environmental controls were put in place. “These are the things that kept me up at night, thinking, how do I handle this?” Tumusiime recalled. “But for me, I went for the bigger good. I must protect the children. I must protect the citizens, because the factory had the capacity to comply.”

The company head may have had the president’s favor and armed guards at the gates, but Tumusiime had faith in her team and her process. Musisi was traveling out of the country and had granted Tumusiime executive authority over the KCCA in her absence, so, Musisi said, “She was fully in charge.” Tumusiime “was able just to look at every single engagement we’d had and make sure that we’d done everything to the T, and this is our last resort, and it's our only chance,” said Ndagire. If the KCCA did not follow through on its threats to close the factory, Tumusiime felt the precedent would be set and the opportunity would be lost. She also had the courage of her convictions: “I think when you're doing the right thing, you don't get scared. I did not have any feeling of ‘Oh, if it backfires . . .’ because I knew I was doing the right thing, and I already had prepared in my mind. If I'm losing this job because I was doing the right thing, so be it. If I was going to lose my life because I'm doing the right thing, so be it. I would have lost it trying to save a life, you know. So, for me, it was just this passion: ‘We need to do something.’ It had been going on for a very long time.”

Ndagire, on the other hand, by her own admission, “had a lot of fears.” Even with significant backup, the risk of something going wrong weighed on her. Only a very small circle of trusted colleagues within the KCCA knew of the plan to close the factory. She explained, “You can't trust anybody because everybody's doing really badly financially, and if they can just get a phone call to somebody who's going to give them a good amount of money for the tip, your whole case or your whole operation would be done.”

Ndagire, her partner, and the sixty KCCA police officers commissioned to back them up set off for the factory well before sunrise. Over several tense hours in the dark, the inspectors argued and negotiated with guards. Around dawn, with emotions still running high, media began to arrive at the scene. “Kampala Capital City Authority says that [the factory] will remain closed until it fulfills the conditions set by the authority,” one reporter wrote. “The factory was closed this morning by KCCA officials over alleged failure to adhere to the acceptable minimum environmental standards.”¹³ Another report read:

“Over 2,500 workers were ordered to vacate the premises or face arrest. The move has been perceived as a good step in the right direction, considering that Ugandans should breathe fresh air—free from contamination.”¹⁴

Ndagire and her partner stayed at the scene with police throughout that day, only leaving when another team arrived to relieve them. They explained over and over that they were not there to cause harm to the business. They would allow company security to stay on site to guard the machinery and make sure it did not malfunction. Ndagire and her team held steady: routine operations must stop. “I was just directing all their directors to go straight to speak to Dr. Judith Tumusiime.”

A Tense Meeting

“Guess what happened when we closed?” asked Tumusiime, smiling broadly. “The CEO appeared for the first time.” Company executives filed into KCCA headquarters late that afternoon. “These people came charged, telling me how they're the president's people,” Tumusiime recounted. “We expected some sort of harmonious meeting: ‘Okay, how do we address this? How can we help you?’ And they came with this arrogance.”

Taken aback, Tumusiime steeled herself. “They looked at me and thought I was naïve, I was young, I didn't know what I was doing. They thought, ‘we'll deal with her.’ At that point I put on the hat of an autocratic leader. I became some sort of a dictator. I made our position very clear because I had the backing of the law. I knew what we were doing.” Birikadde, who also attended the meeting, recalled: “She was very firm. She told this guy, ‘I'm the one who has called for this meeting. So, you don't have to push us. Let's organize ourselves. Let's be systematic. I'm not going to open that factory until you have put up air pollution control equipment.’ And I realized that she was, I can say, a ‘difficult’ lady. Because she was not smiling. She was not bowing to pressure.”

Tumusiime laid out the conditions for reopening: “Build the chimney, start the construction of the toilets, clean up your facility and manage that effluent, give workers protective wear, give them masks.” The executives protested that they would lose \$2 million in revenue each day they were closed. Tumusiime told them, “It's up to you. Comply and we open.”

The executives left the meeting in disbelief. It was not long before Tumusiime's phone started ringing. She recalled: “I got the first phone call from the Minister of Investment, telling me how we are being unreasonable, asking where do we get the authority to do this sort of thing, saying they can't risk losing revenue, people have lost jobs, there are families out there stuck because these people get daily income from the jobs that they do.”

“Then I got another one, from the minister of foreign affairs, and he was actually directing me to open up that facility. These were my words to him—I have never forgotten—I told him, ‘I am not going to open that facility. You are very selfish. You and your family and your grandchildren live in these affluent areas. You don't care about these children and their families who have no voices, who don't have the capacity to live where you live. I'm not going to open this facility for the sake of those millions of people that are dying and are affected because of this facility.’ He told me, ‘Those are very strong words.’ I said, ‘I know.’

“Then I got another minister also calling me, then I got members of parliament telling me how they’re going to take us to parliament, and we’ll have to answer questions. Then I get another from the prime minister.”

Tumusiime stood firm. Then the phone rang again. It was Jennifer Musisi calling from India.

“Once I assign responsibility, I let people do what needs to be done,” said Musisi. “I’m not constantly looking over their shoulders and directing them. I let them do what needs to be done provided they are keeping the policies, strategy, and the law.” But for the first time, after months and months of high-profile arrests and enforcement actions on the part of the KCCA, Musisi had gotten a call from the president. As she recalled it, “He was saying he understood that we had to get compliance, but was there a way we could expeditiously work with the factory so that they are not inconvenienced longer than they absolutely need to be inconvenienced by the closure.”

Musisi urged Tumusiime to work with the factory to reopen as soon as possible. Tumusiime was surprised and somewhat taken aback. She recalled Musisi pointing out that the president calling to intervene was an unprecedented situation and asking if it might be possible for the factory to work towards compliance while open.

“If You Want Me to Resign, I Will.”

Tumusiime had finally gotten the attention of the leadership at Mukwano, and she was not inclined to compromise, especially after the way the executives had treated her. She felt that reopening and allowing the factory to continue operations while it made improvements was a dangerous option—not just because it would allow the egregious pollution and unsanitary working conditions to continue in the meantime, but also because it would create the impression that Mukwano’s call to the president had worked, that the KCCA was as vulnerable to patronage and political pressure as NEMA had turned out to be, or the city council they had replaced had been. “If a phone call can be made to the president,” Tumusiime wondered, “how are you going to lead this city?”

Musisi had already taken on many of Kampala’s power brokers with Tumusiime’s help, and the KCCA had not yet backed down. “The president might have underestimated the team that he chose,” said Tumusiime. “We came in with a mindset that we were here to serve, and we’re going to serve everyone, irrespective of which political party you belong to.”

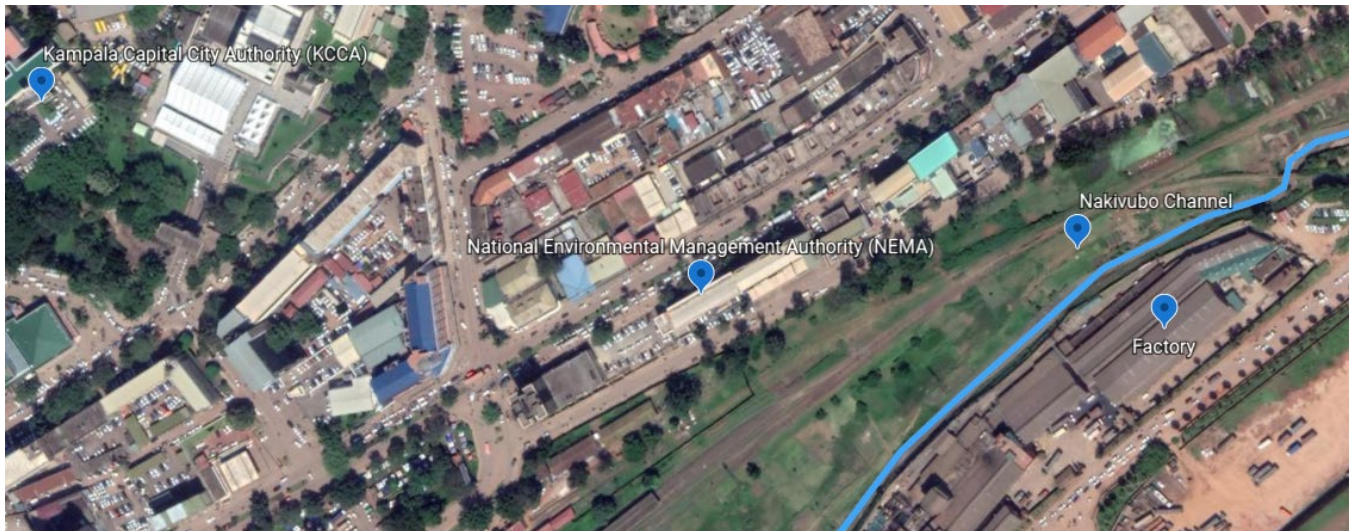
But here was Musisi, her friend and boss, relating her concern about lost wages and the economic importance of the plant, and wondering what kind of compromise could be made. “It was really frustrating,” Tumusiime said. She told Musisi she would not commit to reopening before the factory took meaningful action on their demands. She had already steeled herself to hold firm in this decision and let the chips fall where they may. “If you want me to resign, I will,” she told Musisi.

But the list of violations at Mukwano was long. The problems were years in the making, and the stalemate could not go on forever. The workers would need income, and the KCCA had no immediate way to compensate them for lost wages. The executives had told Tumusiime the demand that the factory build a chimney to raise emissions above ground level alone would take over a week. She was not unsympathetic to these arguments. “I appreciated that other Ugandans were benefitting from this

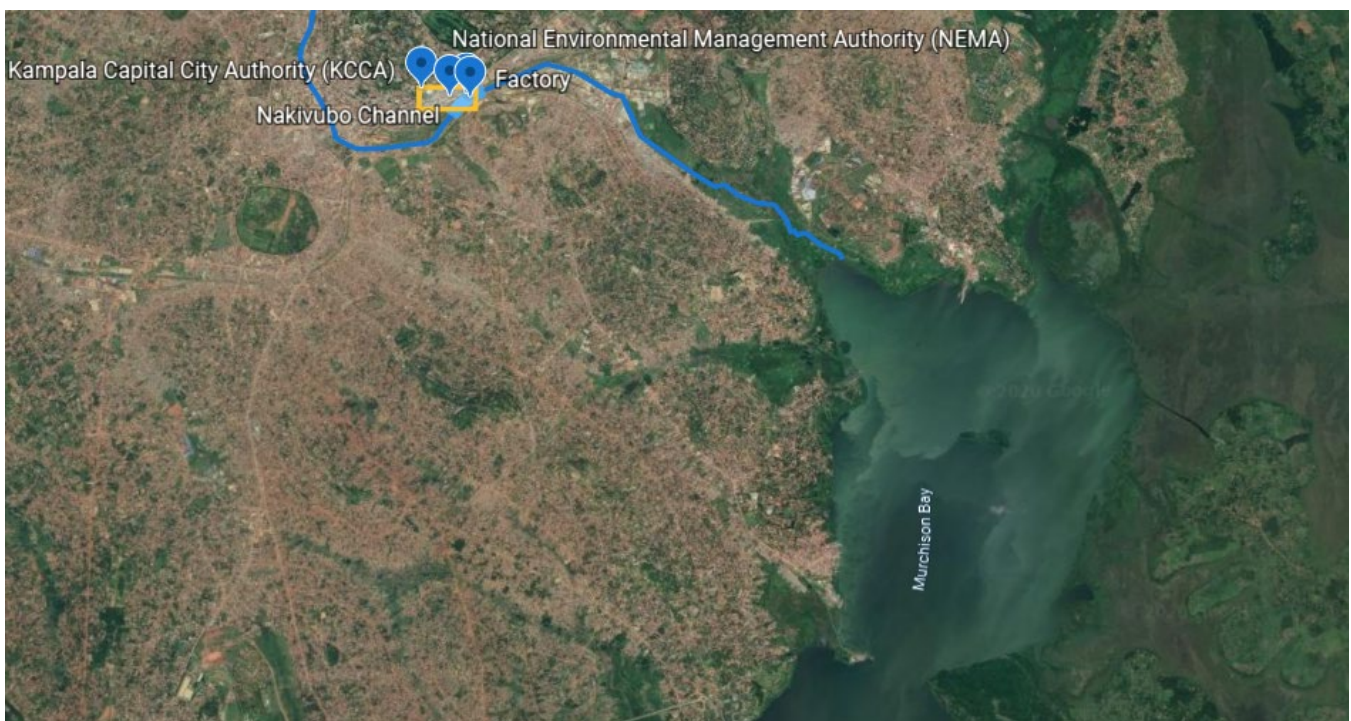
factory. I know what it means to get a job to take care of your family, to pay your kids’ tuition or fees or feed them. I also struggled,” she said. “But you have to look at these young children, whose generation will never benefit from the economic development that the president or the factory believed were so important, and the contribution that this generation could make to our country.” Moreover, she knew Mukwano had the means to do what the KCCA was asking.

Musisi made it clear that she would back Tumusiime’s decision, which left her with the moral and practical question of where to draw the line. What and how much should the KCCA demand of the factory before permitting it to reopen? What would the risks be to the KCCA—and to Musisi, Tumusiime, and her team—if they were asking too much?

Appendix 1 Mapsⁱ



Location of factory vis-à-vis the National Environmental Management Authority, the Nakivubo Channel, and KCCA headquarters



Location of highlighted area (outlined in yellow) and Nakivubo Channel (traced in blue) vis-à-vis Murchison Bay on northwestern shore of Lake Victoria

ⁱ Created with Google Earth, <https://www.google.com/earth/>.

Endnotes

¹ Pamella Ndagire, interview by Gaylen Moore, June 5, 2020. All further quotes from Ndagire from this interview unless otherwise noted.

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³ Thierry Hoza Ngoga, “The Potential for Tenure-Responsive Land Use Planning in Kampala,” International Growth Center Policy Brief, IGC Uganda, January 2018, <https://www.theigc.org/wp-content/uploads/2018/02/Ngoga-2018-policy-brief.pdf>.

⁴ Andrea M. Brown, “Uganda’s Emerging Urban Policy Environment: Implications for Urban Food Security and Urban Migrants,” *Urban Forum* 25 (January 18, 2014): 254.

⁵ CBS News, “The Most Polluted Cities in the World, Ranked,” retrieved November 16, 2020 at <https://www.cbsnews.com/pictures/the-most-polluted-cities-in-the-world-ranked/37/>.

⁶ Judith Tumusiime, interview by Gaylen Moore and Anna Burgess, July 12, 2019. All further quotes from Tumusiime from this interview unless otherwise noted.

⁷ Jennifer Musisi, interview by Gaylen Moore, January 17, 2020. All further quotes from Musisi from this interview unless otherwise noted.

⁸ Grace Birikadde, interview by Gaylen Moore, October 22, 2019. All further quotes from Birikadde from this interview unless otherwise noted.

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¹⁰ “Kalungi’s Lens: One Year After Jennifer Musisi,” New Vision, December 31, 2019, <https://www.newvision.co.ug/news/1512766/kalungis-lens-jennifer-musisi>.

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¹² Gerald Tenywa, “Uganda: NEMA Threatened Mukwano Factory,” New Vision, January 13, 2011, <https://allafrica-com.ezp-prod1.hul.harvard.edu/stories/201101140080.html>.

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¹⁴ “POISONOUS: Multi-Billion Mukwano Industries Closed,” Chimp Reports, May 23, 2012, <https://chimpreports.com/4614-poisonous-multi-billion-mukwano-industries-closed/>.