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Municipal Regulatory Systems and the Scale-Up of Clean Cooking in Uganda

Barriers & Recommendations

Strengthening Governance Alignment to Enable Private Sector Delivery of National Clean Cooking Targets

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Introduction

Overview of existing policies

Uganda's clean cooking agenda sits at the intersection of energy, environment, urban management, and trade policy. The National Energy Policy (2023) and the draft National Clean Cooking Strategy provide the overarching sector direction, while NDPIV and the Tenfold Growth Strategy embed clean cooking access within Uganda's economic transformation agenda. At the local level, the Trade Licensing Act (Cap 101) devolves trading licence administration to urban authorities, and the Markets Act 2023 introduced digital, cashless, item-based offloading fees for trading in public markets, replacing earlier trade-licence-based arrangements. For Kampala specifically, the KCCA Act (Cap 105), the Maintenance of Law-and-Order Ordinance (2006), and the City Outdoor Advertising Policy (2008) frame how trading, public space use, and outdoor advertising are administered. Environmental obligations sit under the National Environment Act (Cap 181), which NEMA administers. Each of these instruments is legitimate and serves a clear public purpose; the issue this brief addresses is how they combine in practice where clean cooking enterprises engage urban consumers.

Brief Methodology for Proposed Recommendations

Developing effective policy recommendations requires a systematic and participatory approach to ensure that proposed actions are practical, sustainable, and responsive to implementation realities. In the context of clean cooking, policy interventions can support access to cleaner fuels and technologies, strengthen enabling infrastructure, and improve coordination among public and private actors involved in delivery.

The recommendations presented in this brief are informed primarily by the Multi-Level Dialogue on Local Enforcement and Compliance Pathways for Clean Cooking Businesses in Kampala, convened by KCCA with support from ICLEI Africa under the ENACTUS project on 25 February 2026. The dialogue brought together representatives from KCCA directorates, NEMA, MEMD, Uganda Police, and private sector clean cooking enterprises.

Participants contributed to a business journey mapping exercise examining the regulatory and compliance processes encountered by clean cooking enterprises from registration to last-mile delivery, alongside a ranking exercise used to identify and prioritise the most significant barriers affecting implementation. These insights were complemented by ENACTUS baseline evidence and earlier ENACT diagnostic work on Uganda's clean cooking enabling environment.

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The methodology followed four practical stages:

- Preparatory phase: problem identification, stakeholder engagement, and review of available research and data.
- Finalisation phase: validation of issues, impact assessment, and review of proposed recommendations with relevant actors.
- Policy adoption phase: translation of recommendations into government decision-making and supporting administrative measures.
- Implementation phase: action planning, capacity building, monitoring, evaluation, and continued advocacy.

Clean Cooking Delivery and the Role of Local Governments

A large-scale transition of Ugandan energy consumers to clean cooking technologies is a nationally determined policy priority. The primary mode of delivery is a market-led approach driven by private sector enterprises of varying scale and commercial maturity. MSMEs form the backbone of this approach, yet often operate at a scale and level of maturity that warrants public sector support to enable them to realise their potential as primary drivers of clean cooking access.

Last-mile sales and marketing channels suitable for reaching underserved communities involve distinct business activities, including sales from licensed fixed premises, door-to-door consumer outreach, outdoor product demonstrations and sales in public space, branded transport, and signage. The supply side of the sector also requires production, storage, and movement of fuels including biomass briquettes, bioethanol, and LPG.

Each of these activities takes place within the jurisdiction of relevant urban authorities and is therefore subject to regulatory oversight. At a national level, many of these activities fall within the framework of the Trade Licensing Act (Cap 101), which establishes licensing authorities and devolves responsibility for administering trading licences to local authorities within cities, municipalities, and towns. In Kampala, the KCCA Act (Cap 105) and the Maintenance of Law-and-Order Ordinance (2006) give KCCA authority over public space usage, trade licensing, outdoor advertising, environmental standards, and enforcement procedures across public markets and the broader urban territory.

This regulatory footprint means that KCCA is not peripheral to clean cooking market development; it is structurally embedded in it. Every point at which a clean cooking enterprise engages consumers publicly in Kampala involves at least one regulatory touchpoint administered by municipal

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authorities. Municipal authorities in this system are not simply regulatory gatekeepers; they are frontline implementation partners in the clean cooking ecosystem.

NEMA adds an additional compliance layer governing environmental standards, emissions, noise permits, and site safety requirements that are distinct from KCCA's trading authorisations and apply irrespective of whether an enterprise holds a valid KCCA licence. Uganda Police and the Ministry of Works govern further dimensions of public space and transport operations.

KCCA and NEMA carry legitimate responsibilities for urban order, public health, and environmental protection under national legislation. This brief treats both authorities as actors with valid mandates and meaningful day-to-day discretion within them. Alongside this formal layer, an informal layer of governance operates at market and street level, including locally appointed market chairpersons and other informal intermediaries that clean cooking enterprises encounter at the point of trade. Both layers shape the compliance environment experienced by MSMEs in practice.

Barriers to Compliance and Recommendations

The Kampala MLG dialogue and supporting ENACT diagnostic work surfaced four mutually reinforcing barriers that shape how clean cooking MSMEs experience the municipal regulatory environment. They are summarised below and matched to practical recommendations.

1. Information gaps in regulatory requirements and payment systems

Regulatory reforms, most notably the transition to digital, cashless, item-based offloading fees under the Markets Act 2023, have not been consistently translated into operational guidance at market level. Clean cooking MSMEs continue to encounter outdated licensing practices and rely on informal intermediaries to navigate compliance requirements. This disconnect between formal regulatory frameworks and accessible information creates avoidable costs and undermines transparent, rules-based market participation.

The information gap also operates within institutions. Enterprises reported that enforcement teams sometimes acted against activities that other parts of KCCA had authorised, indicating that internal communication between approval and enforcement functions is not yet systematic.

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Recommendation 1	Establish a publicly accessible regulatory information source for clean cooking enterprises.
Description and Justification	Improving compliance requires bridging the gap between regulatory frameworks and practical adherence by market actors. While digital payment systems and revised licensing frameworks are in place, limited awareness at the point of implementation contributes to the persistence of legacy and informal payment channels. A consolidated, plain-language regulatory reference clearly outlining requirements, costs, payment channels, and verification mechanisms would reduce ambiguity and transaction costs. By providing market actors with clear information on requirements, procedures, and official fees, this measure would reduce reliance on informal channels and improve visibility of regulatory processes. This intervention builds on existing policy frameworks and focuses on improving implementation rather than reforming regulation.
Stakeholders involved and the roles they can play	• KCCA (Markets, Revenue, Communications): Develop and disseminate standardised guidance. • MEMD: Ensure alignment with clean cooking policy priorities. • URA / Ministry of Finance: Reinforce digital payment verification systems. • SMEs / industry bodies: Validate usability and support dissemination. • Development partners: Support design and rollout.
Time horizon	Short-term: 6 to 12 months for design, validation, and rollout.

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2. Cost misalignment from classification of clean cooking activities

Clean cooking enterprises conducting consumer outreach, demonstrations, and door-to-door engagement are often treated within municipal outdoor advertising frameworks. This subjects activities that are central to last-mile energy access to high-cost permitting structures designed for commercial advertising, rather than low-margin distribution models addressing a nationally prioritised energy access gap. The resulting cost burden constrains the ability of enterprises to scale consumer engagement, particularly in low-income urban areas where such outreach is essential for market development.

Recommendation 2	Introduce differentiated administrative treatment for clean cooking consumer engagement activities within existing permitting systems.
Description and Justification	Current permitting structures do not adequately reflect the operational characteristics of clean cooking distribution, particularly its reliance on decentralised, community-level engagement. Applying standard advertising permit frameworks to these activities creates a structural cost barrier that limits market expansion. Introducing differentiated administrative treatment, such as simplified permitting processes, bundled approvals, or adjusted fee structures within existing systems, would better align regulatory implementation with sector realities. As Uganda moves to introduce appliance standards for clean cooking products, an opportunity exists to tie enterprise product compliance to eligibility for differentiated administrative treatment. This approach maintains regulatory oversight while enabling more appropriate compliance pathways for enterprises operating in public interest markets.
Stakeholders involved and the roles they can play	• KCCA (Revenue, Public Relations, Enforcement): Adjust administrative interpretation and application of permit categories. • MEMD: Provide sector guidance to support alignment. • SMEs: Align outreach activities with defined categories.

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	• Development partners: Support technical design of differentiated approaches.
Time horizon	6 to 18 months for protocol development and institutionalisation.

3. Fragmented compliance requirements between agencies

Clean cooking enterprises operate within a multi-agency regulatory environment involving KCCA, NEMA, Uganda Police, and the Ministry of Works, each with distinct and non-integrated compliance requirements. The absence of a coordinated framework results in duplication, unclear processes, and extended administrative timelines. Enterprises must navigate overlapping mandates without a single reference point, increasing compliance complexity and operational uncertainty.

Recommendation 3	Establish a coordinated inter-agency compliance framework with defined roles and unified guidance for clean cooking enterprises.
Description and Justification	The current compliance landscape requires enterprises to independently interpret and sequence compliance with multiple regulatory requirements across institutions. This fragmentation increases administrative burden and contributes to delays, misapplication of requirements, and inconsistent enforcement. A coordinated framework defining roles, sequencing compliance steps, and aligning institutional guidance would reduce duplication and improve predictability. This does not require structural reform of mandates, but rather improved coordination and communication between institutions. Providing a unified compliance pathway would significantly lower barriers to entry and scale for clean cooking enterprises.
Stakeholders involved and the roles they can play	• MEMD: Convene and coordinate inter-agency alignment. • KCCA, NEMA, Uganda Police, Ministry of Works: Define roles and harmonise guidance. • SMEs / associations: Provide feedback on usability. • Development partners: Support coordination platforms and tools.
Time horizon	9 to 18 months.

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4. Communication gaps between regulatory approval and enforcement functions

Instances of enforcement action taking place during authorised clean cooking activities indicate a gap between regulatory approvals and field-level implementation. These inconsistencies suggest that internal communication systems do not reliably transmit decisions to enforcement teams. As a result, clean cooking enterprises may experience operational disruptions, including confiscation of goods and halted activities, despite compliance with approval processes.

Recommendation 4	Implement an internal notification and verification protocol linking approvals to enforcement operations.
Description and Justification	Ensuring consistency between regulatory intent and enforcement practice is critical for a predictable operating environment. Current gaps in internal communication can result in enforcement actions that contradict approved activities, undermining both institutional credibility and private sector confidence. Establishing standardised notification systems, where authorised activities are recorded, shared, and verifiable by enforcement personnel, would reduce such inconsistencies. This is an administrative improvement that strengthens implementation fidelity without requiring changes to regulatory frameworks, and directly addresses one of the most disruptive risks faced by enterprises.
Stakeholders involved and the roles they can play	• KCCA (Enforcement, Legal, Markets): Design and implement internal coordination systems. • Uganda Police: Align enforcement with verified approvals. • MEMD: Provide coordination support. • SMEs: Provide timely notification of activities. • Development partners: Support system design, including simple digital tools where appropriate.
Time horizon	3 to 9 months.

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Conclusion

Uganda's clean cooking scale-up agenda depends not only on finance, technologies, and consumer awareness, but also on the everyday regulatory systems through which enterprises reach households and small businesses. The evidence reviewed for this brief suggests that the central challenge is not the absence of regulation, nor the illegitimacy of existing mandates. The challenge is that national clean cooking objectives and local regulatory implementation are not yet sufficiently aligned at the point where market delivery takes place.

KCCA, NEMA, Uganda Police, MEMD, and other public institutions each hold valid roles in safeguarding urban order, environmental protection, public safety, and sector development. However, when compliance requirements are unclear, fragmented, costly, or inconsistently communicated to enforcement teams, clean cooking MSMEs face avoidable barriers that can slow market growth in precisely the communities where cleaner cooking solutions are most needed.

The recommendations in this brief therefore focus on practical implementation improvements: clearer public information, more appropriate administrative treatment for clean cooking outreach, coordinated inter-agency guidance, and stronger internal links between approvals and enforcement. These actions are deliberately near-term and low-cost. They do not require wholesale legal reform. Instead, they offer a pathway for MEMD, KCCA, NEMA, development partners, and the private sector to strengthen governance alignment and make existing regulatory systems more supportive of Uganda's national clean cooking targets.

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References

Government of Uganda. Fourth National Development Plan (NDP IV).

Government of Uganda. Tenfold Growth Strategy.

Ministry of Energy and Mineral Development (MEMD). National Integrated Clean Cooking Strategy (NICCS), 2025.

Ministry of Energy and Mineral Development (MEMD). National Energy Policy, 2023.

Ministry of Energy and Mineral Development (MEMD). Draft National Clean Cooking Strategy.

Kampala Capital City Authority Act (Cap 105).

Trade Licensing Act (Cap 101).

Markets Act, 2023.

KCCA Maintenance of Law-and-Order Ordinance, 2006.

KCCA City Outdoor Advertising Policy, 2008.

National Environment Act (Cap 181).

ICLEI Africa / ENACTUS. Multi-Level Dialogue on Local Enforcement and Compliance Pathways for Clean Cooking Businesses in Kampala, 25 February 2026.

ICLEI Africa / ENACTUS. Baseline assessment and stakeholder engagement records, Greater Kampala Metropolitan Area.

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