



July 22, 2024

Philippe Groueix  
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TotalEnergies EP Uganda  
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**Re: Summary of findings for upcoming report on the human rights and environmental impact of the Kingfisher oil project in Uganda**

Dear Mr. Groueix,

I write on behalf of [Climate Rights International](#), an international NGO that conducts research and advocacy on the human rights dimensions of the climate crisis. We have conducted research for a report that we plan to publish on the human, environmental, and climate harms associated with the Kingfisher oil development project in Uganda, of which you are a majority owner and joint venture partner.

We have sent the attached letter to China National Offshore Oil Corporation (CNOOC), your joint venture partner and the operator of the Kingfisher project. As the majority owner of the Kingfisher project, TotalEnergies has an obligation to ensure that it does not lead to human right abuses or serious environmental harms. We note that TotalEnergies has made public [commitments](#) on various issues we have identified in our research. For example, the [2024 Sustainability and Climate Progress Report](#) states:

- “Reducing the environmental risks associated with liquid, gaseous and solid discharges into the environment is our top priority in controlling the environmental impact of our operations.”
- “Respect for each other is a core value at TotalEnergies, at the heart of our collective ethics and our Code of Conduct. The Code of Conduct applies to all our employees, as well as to our suppliers and contractors. Respect for each other means respect for human rights, which are non-negotiable in our operations around the world.”
- “In our project development process, we conduct specific due diligence as soon as studies begin to identify the potential negative impacts of our activities on local communities, as well as appropriate remediation plans, in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPR). We pay particular

attention to salient risks concerning access to land, the right to health and an adequate standard of living.”

- “When security contractors or government forces in charge of protecting our employees and installations have to intervene, we make sure they have been vetted individually and received adequate training. In 2023, over 900 people have been trained in this way. We perform analyses each year to assess the security risks at our sites and publish an annual VPSHR report.”

Our research has identified serious violations of each of these policies.

In order to ensure that our report accurately reflects the views, policies, and practices of TotalEnergies and its joint venture partners, CNOOC and the Uganda National Oil Cooperation, we request that you or your representatives respond to the questions set forth in the attached letter. In addition, we request that you explain how you have maintained oversight and exercised due diligence over the Kingfisher project.

Any responses will be reflected in our reporting as appropriate. We will publish your responses on our website. Your responses can only be considered for inclusion in our report if we receive them by August 2, 2024.

Please reply to [adams@cri.org](mailto:adams@cri.org), copying [deyah@cri.org](mailto:deyah@cri.org). In addition, please include any other materials, statistics, and/or information you think may be relevant.

We would also welcome the opportunity to speak with you or your representatives. Please let me know if you have any questions or if you would like to arrange a meeting or video conference.

Sincerely,



Brad Adams  
Executive Director

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