



July 22, 2024

Ms. Proscovia Nabbanja  
Chief Executive Officer  
Uganda National Oil Company  
[proscovia.nabbanja@unoc.co.ug](mailto:proscovia.nabbanja@unoc.co.ug)

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

Dear Ms. Nabbanja,

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 minority owner and joint venture partner.

We have sent the attached letter to the China National Offshore Oil Corporation (CNOOC), your joint venture partner and the operator of the Kingfisher project. As a state-owned company and minority owner of the Kingfisher project, the Uganda National Oil Company has an obligation to ensure that the project does not lead to human right abuses or serious environmental harms.

We note that UNOC has made public commitments on various issues we have identified in our research. For example, the UNOC website states:

- “At the Corporate level, the Vision of UNOC is “To be an innovative and profitable company that operates across the petroleum value chain for the benefit of all Ugandans”, therefore the current Corporate strategy will make direct contribution towards SDG 1 (ending poverty).”
- “UNOC’s intervention towards enhancing HSSE [Health, Safety, Security, and Environment] Performance aligns well with SDG 13 (climate action) and SDG 11 (sustainable cities and communities).”
- “UNOC’s strategy is keen to outline initiatives to adopt good practice principles and guidelines that will align business practices for sustainable development.”

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

We also note that we cannot identify any explicit commitments to uphold international human rights law and norms.

In order to ensure that our report accurately reflects the views, policies, and practices of UNOC and its joint venture partners, TotalEnergies and CNOOC, 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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