

October 9, 2024

The Ministry of Commerce  
No.2 Dong Chang'an Avenue,  
Beijing,  
100731  
People's Republic of China

**Re: New Report by Climate Rights International on Human Rights, Environmental, and Climate Harms Associated with the Kingfisher Oil Project in Uganda**

Dear Mr. Wang Wentao,

We are writing to bring to your attention our recent report about the Kingfisher oil development project, ["They Don't Want People to Stay Here: How CNOOC's Kingfisher Oil Project in Uganda Is Causing Human Rights, Environmental, and Climate Harms."](#) Because of the human rights, environmental and climate harms resulting from the project, Climate Rights International and the 26 undersigned organizations urge you not to support or finance the project -- and to end any support you may already be providing.

The Kingfisher project, operated by the Chinese National Offshore Oil Corporation Uganda (CNOOC), is part of the Lake Albert Development Project, which also includes the Tilenga oil development project and the East Africa Crude Oil Pipeline (EACOP).

Our report, based on 98 interviews with local residents, activists, and workers in Uganda, supported by analysis of satellite image and official documents, details widespread human rights violations, environmental degradation, and significant climate impacts linked to the Kingfisher oil project. TotalEnergies owns 56.67% of the project, CNOOC 28.33%, and the Uganda National Oil Company (UNOC) 15%.

These oil projects have been promoted as drivers of prosperity for Uganda. However, our investigation reveals a very different reality. Like the Tilenga and EACOP projects, both of which are partly owned by CNOOC, the Kingfisher oil project is associated with numerous human rights abuses, environmental degradation, massive and unnecessary future carbon emissions, and a disturbing disregard and lack of accountability for harms to local communities. Many of the abuses listed above are also in violation of Ugandan law, as documented in the report.

Some of our key findings include:

### **Human Rights Violations**

- **Forced Evictions:** Communities have been forcibly displaced by Ugandan security forces. Many residents were given only hours to vacate their homes and fled with what they could carry, resulting in loss of their homes, livestock and other assets. Residents who resisted inadequate compensation offers faced threats, intimidation, and coercion, ultimately forcing them to relinquish their land.
- **Lack of or Inadequate Compensation:** Despite CNOOC's commitment to adhere to international standards, including the International Finance Corporation's (IFC) guidelines on land acquisition and resettlement, the reality on the ground is starkly different. Many community members have received no compensation for the land, homes, or other assets. Many of those who did receive compensation report that it was inadequate to enable them to retain their standard of living.
- **Coercion in Land Acquisition:** Residents who resisted inadequate compensation offers faced threats, intimidation, and coercion, ultimately forcing them to relinquish their land.
- **Loss of Livelihoods and Impoverishment:** Many of those living in the project area reported devastating impacts on their livelihoods, leaving them struggling to feed and house their families and to pay for health care and education.
- **Sexual and Gender-Based Violence:** Women reported incidents of sexual violence and coercion perpetrated by both Ugandan security forces and oil company managers, creating a highly unsafe and exploitative environment.
- **Labor Rights Abuses:** Workers on the Kingfisher project have endured exploitative conditions, including excessive working hours, inadequate wages, hazardous working environments, and demands for bribes to secure employment.
- **Suppression of Dissent:** Activists and environmental defenders opposing the Kingfisher and EACOP projects have faced violence, mistreatment, torture, arbitrary arrests, and even disappearances at the hands of the Ugandan military. Despite this climate of fear, courageous human rights, environmental, and climate defenders continue to speak out, often facing further violence and arrests.
- **Impunity and Lack of Justice and Accountability:** The Ugandan People's Defence Force (UPDF) has been perpetrating grave human rights abuses under the guise of "protecting" oil installations, with complete impunity and no meaningful consequences for soldiers or those in positions of command. There have been, to our knowledge, no criminal investigations of abuses by security forces and nobody has been brought to justice.

## Environmental and Climate Harms

- **Oil and Chemical Pollution:** Fisherfolk have reported oil slicks and dead fish in Lake Albert, devastating local livelihoods. Whistleblowers within CNOOC's subcontractors have exposed illegal dumping of oil and chemicals into the lake and surrounding areas with impunity.
- **Ecological Degradation:** The Kingfisher project has caused severe damage to the local natural environment, including water pollution, soil contamination, and destruction of natural habitats.
- **Climate Impact:** Projections from the [Climate Accountability Institute](#) indicate that the Kingfisher oil project will generate 379 million tons of carbon dioxide emissions over 25 years, with annual peak emissions surpassing the combined totals of Uganda and Tanzania. This is incompatible with the Paris Agreement's goal of limiting global warming to 1.5°C and poses severe risks to global climate stability.

## Key Recommendations

Our recommendations to the Chinese government include:

- **Zero Tolerance for Violations of Ugandan law and Human Rights Abuses in CNOOC and other Chinese-funded projects:** Investigate the serious allegations of violations of Ugandan law and human rights violations and harms associated with the Kingfisher project. These abuses represent significant reputational, political, and financial risks for China and its standing with the people of Uganda.
- **Due Diligence:** Ensure full compliance with Chinese policies in relation to environmental and social risks of overseas projects. This should include transparent and rigorous reporting and monitoring concerning compliance with national and international standards, and access for civil society organizations and affected communities and peoples to file complaints and grievances.
- **End Support for Fossil Fuel Projects:** The Chinese government has announced an end to support for overseas coal projects. This should be broadened to include all overseas fossil fuel projects, including the Kingfisher project.
- **Redirect Support:** Invest in Uganda's green future and redirect financial support to projects advancing a just energy transition to renewable energy.

A full set of recommendations can be found at the end of the report. They were developed with and are endorsed by a wide range of organizations, affected communities, and individuals in the Kingfisher area and elsewhere in Uganda.

We would be happy to meet with you to further discuss our findings and our recommendations. Please let me know if you have any questions or if you would like to arrange a call or video conference.

Sincerely,



Brad Adams  
Executive Director  
Climate Rights International

1. Environmental Governance Institute – Uganda.



2. Strategic Response on Environmental Conservation (STREC) – Uganda



3. TASHA Research Institute Africa – Uganda



4. Green Conservers – Tanzania



5. East African Crude Oil Pipeline Host Communities – Uganda



6. Center for Citizens Conserving Environment & Management – Uganda



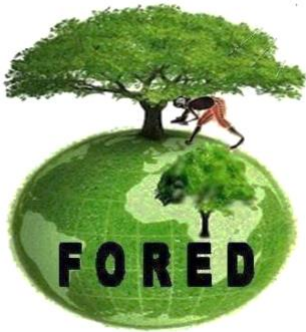
7. Extinction Rebellion – DRC



8. Extinction Rebellion, Université de Goma – DRC



9. Forum des Engagés pour le Développement durable (FORED) – DRC



10. Forum pour la Paix, l'Environnement et le Développement – DRC



11. Innovation pour le Développement et la Protection de l'Environnement – DRC



12. Strides For Green Initiative – Uganda



13. Youth For Green Communities (YGC) – Uganda



14. Community Transformation Foundation Network (COTFONE) – Uganda



15. Rwanisa Environmental Change and Humanitarian Initiative – Uganda



16. Organization for Community Engagement – Tanzania



17. Green Foster Action – Uganda



18. Africa Institute for Energy Governance (AFIEGO) – Uganda





19. Fridays for Future – Uganda



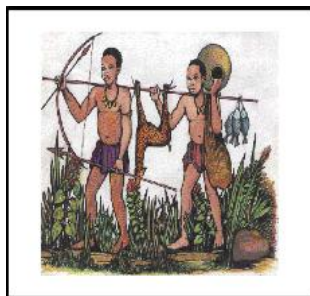
20. Alerte Congolais pour l'Environnement et le Droit de l'Homme. "ACEDH" – DRC



21. Foyer de Développement pour l'Autopromotion des Personnes Indigentes et en Détresse – DRC



22. Programme d'Intégration et Développement des Peuples Pygmée, PIDP – DRC



23. Synergie des Jeunes pour le Développement et les Droits Humains – DRC



24. Solidarity Network of Grass Root Environment and Human Rights Defenders – Uganda



25. Oil Refinery Resident Association – Uganda



26. Fédération du comité des pêcheurs du Lac Albert – DRC

