

October 10, 2024

Mr. James Wright
Chief Financial Officer
Chaucer Group
james.wright@chaucerplc.com

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

Dear Mr. Wright,

We write to you and 33 other financial institutions and insurance companies to bring to your attention a new report from Climate Rights International, "[They Don't Want People to Stay Here: How CNOOC's Kingfisher Oil Project in Uganda Is Causing Human Rights, Environmental, and Climate Harms.](#)"

We understand that your company is or may be considering providing support for the Lake Albert Development Project in Uganda, which includes the Kingfisher oil development project, the Tilenga oil development project, and the East Africa Crude Oil Pipeline (EACOP).

Because of the human rights, environmental and climate harms resulting from the project, Climate Rights International and the **27** undersigned organizations urge you not to support or finance the project – and to end any support you may already be providing. Major banks and insurance companies based in Europe, Japan, and North America have publicly ruled out support for these projects because of their harmful climate, environmental, and human rights consequences.

As you know, the United Nations Guiding Principles on Business and Human Rights impose a responsibility on businesses to avoid causing or contributing to negative impacts on human rights associated with their activities or business relationships.

Climate Rights International's report, based on 98 interviews with local residents, activists, and workers in Uganda, and supported by satellite imagery and official documents, details widespread human rights violations, environmental degradation, and significant climate impacts linked to the Kingfisher oil project, which is operated by the China National Offshore Oil Corporation (CNOOC) Uganda. TotalEnergies owns 56.67% of the project, CNOOC 28.33%, and the Uganda National Oil Company (UNOC) 15%. (These are the same ownership shares as for the related Tilenga oil development project, operated by TotalEnergies.)

These oil projects and the associated pipeline have been promoted as drivers of prosperity for Uganda. However, our investigation reveals a very different reality. 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 described below violate Ugandan law.

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 their 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, lack of written contracts, and demands for bribes to secure employment.
- **Suppression of Dissent:** Activists and environmental defenders opposing the Kingfisher, Tilenga, 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 for Institutions Considering Additional or New Support for Kingfisher

Considering the serious human rights, environmental, and climate harms resulting from this project, we recommend that your company take the following actions:

- **Do Not Support or Finance:** Do not support or finance the Kingfisher or related projects due to their climate, environmental, and human rights impacts. If you have already provided support, withdraw that support and help remediate any human rights and environmental harms.
- **Public Commitment:** Publicly commit to halt all finance and insurance support for all fossil fuel projects due to the high climate, environmental, social, and governance risk.
- **Redirect Support:** Invest in Uganda's green future and redirect financial support to projects advancing a just energy transition to renewable energy. Certify that green energy technology given as aid, loans, or investment from China was made free of forced labor.

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.

I am signing this letter on behalf of Climate Rights International and the 27 other organizations listed below. We would be happy to meet with you to further discuss our findings and our recommendations.

Sincerely,



Brad Adams
Executive Director
adams@cri.org

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



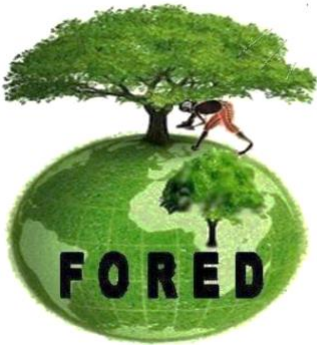
7. Extinction Rebellion – DRC



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



YOUTH FOR GREEN COMMUNITIES

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



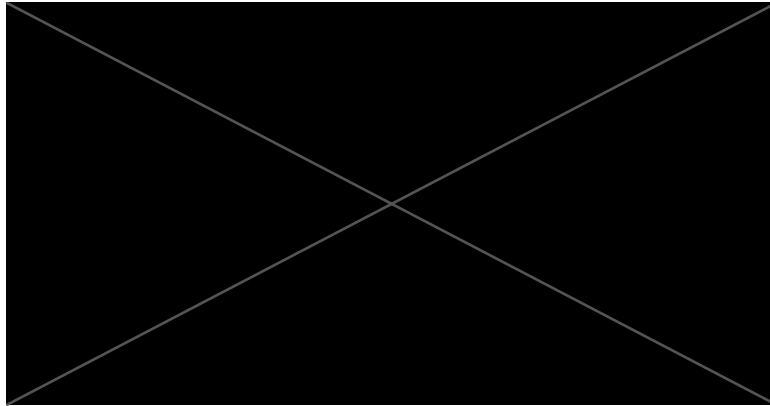
22. Programme d'Intégration et Développement des Peuples Pygmée, PIDP – DRC



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



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



26. Oil Refinery Resident Association – Uganda



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

