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Received by
Damba Nath
17/07/2025

July 08, 2025

Li Yunze
Minister
National Financial Regulatory Administration
Jia No.15 Financial Street, Xicheng District, Beijing, 100033

Re: Financing of the East African Crude Oil Pipeline Potentially Violating the Green Finance Guidelines

Dear Minister Li,

As representatives of Ugandan, Tanzanian, and African environmental groups, local civil society organizations, landowners, and residents of affected communities from Uganda and Tanzania, we are writing to raise concerns regarding the East African Crude Oil Pipeline (EACOP), which is already supported by Industrial Commercial Bank of China (ICBC) as a financial advisor, and reportedly may be financed by several Chinese institutions, including China Export-Import Bank (China Exim Bank) with the support of Sinosure.[i] EACOP is being developed by Total Energies and China National Offshore Oil Company (CNOOC), in partnership with the Ugandan and Tanzanian governments.

Developing EACOP will lead to severe negative environmental, social, climate, and biodiversity impacts. Its construction is already triggering widespread opposition among Ugandan, Tanzanian, and wider African communities. As such, we and many other stakeholders have repeatedly requested China Exim Bank, Sinosure, and other Chinese actors to not provide any financial support to the project or its project developers. Unfortunately, no Chinese financial institution has responded to our public concerns.

We note that due to its negative environmental, social, climate, and biodiversity impacts, the project does not align with relevant Chinese green finance policies and international norms and standards. Given the lack of response of Chinese financiers, we are now contacting China's National Financial Regulatory Administration (NFRA) to flag our concerns.

We respectfully ask that the NFRA urge and discourageany Chinese financier and institution from supporting EACOP, including China Exim Bank and Sinosure. If funds have already been committed, we strongly ask that the NFRA work with each institution to re-evaluate, suspend, cancel, or require immediate repayment of any current or planned funds which support EACOP.

Due to negative impacts and widespread local opposition, over 50 banks, underwriters, insurance companies and investors[i] have already publicly declared that they would prohibit any involvement. The project has been rejected by the global banking and insurance industry at an unprecedented level, and we fear that the developers are now turning to China as a "last resort" to secure the necessary funding. While EACOP Ltd. recently secured a portion of external financing,[ii] the amount secured is less than 50% of the debt financing initially sought, suggesting that the project is still searching for additional funders. An anonymous source told the international media outlet Reuters that Chinese funders have committed their support, but Chinese institutions have neither confirmed or denied their involvement.[iii]

Studies have found that developing Uganda's oil industry will have overall negative, instead of positive impacts on the country's economic prospects[iv]. **If Chinese financial institutions choose to support EACOP, doing so would deviate from its international financial peers, as well as China's own policies which emphasize fostering "win-win relationships" with local stakeholders. Although the Ugandan and Tanzanian governments support EACOP, we emphasize that local communities in both countries do not.** Impacted communities, as well as those across East Africa writ large, have long opposed EACOP and will likely continue to due to the project's unmitigable impacts. Furthermore, EACOP's existing and ongoing negative impacts[v] are already affecting project costs. Repeated delays are causing long-standing confusion[vi] and stalling construction, impacts which are ultimately raising and adding unanticipated project costs and financial risks.[vii]

Evidence shows that there are numerous environmental, social, climate, biodiversity, and financial risks, many of which cannot be reduced or mitigated. We ask that the NFRA please review and consider our concerns.

For reference, we include further details and analysis of the project's negative environmental and social impacts, as well as failure to comply with host country, Chinese, and international policies and regulations. Due to the depth and breadth of the project's negative impacts, the following provides a broad overview of key concerns due to space constraints. It is not meant to be exhaustive.

Negative Environmental Impacts

- **Biodiversity Impacts:** EACOP will cut through wildlife reserves and protected areas along its route in Tanzania and Uganda, endangering unique and highly fragile ecosystems which host a number of iconic species.[viii] According to the project's environmental and social impact assessment (ESIA) for Uganda, at least 27 threatened plant and animal species designated as threatened or vulnerable based on Ugandan standards and the IUCN Red List would be impacted, such as chimpanzees, red colobus monkey, leopards, hippopotamus, among others[ix]. Furthermore, although the ESIA states biodiversity impacts, an independent study commissioned by Uganda's National Environmental Management Authority demonstrates a systemic lack of analysis on how project developers will plausibly manage impacts on key species and protected areas, such as chimpanzees Taala Forest Reserve, respectively.

  For instance, the study reveals that proposed mitigation measures for chimpanzees, which are critical for maintaining the health of Central African forests, are vague, noncommittal, and incomplete. According to the study, "It is remarkable that the full impact assessment of the project on the chimpanzees is not yet ready, while considerable time between version 1 and 2 of the ESIA has passed."[x]

Furthermore, the independent study shows that the ESIA lacks consistency in providing detail on impacts to protected areas, and unevenly discusses certain areas, such as the Taala Forest Reserve, among others. The study further shows that the ESIA fails to explain potential water and oil spill impacts to the forest reserve, as well as alternatives which could have prevented the pipeline from cutting through the forest to begin with. The Worldwide Fund for Nature (WWF) estimates that nearly 2,000 square kilometers of protected areas, which are important for conservation, will be affected by the pipeline's current route.

As a result of negative biodiversity impacts, a host of communities, environmentalists, biodiversity experts, tourism sector players, civil society experts, scientists, academics, and even the Uganda Wildlife Authority have pointed out the project's impacts on Uganda's long term conservation efforts and commitment to sustainable tourism. For instance, Murchison Falls National Park (locally known as Kabalega National Park) is a major tourism destination. Uganda's National Environment Management Authority commissioned a study on the economic valuation of Murchison Falls Conservation Area and nearby Budongo Central Forest Reserve. It found that when excluding the value of oil reserves in the area, Murchison Falls and Budongo forest still have an economic value of over USD 60 billion. In contrast to oil, in which reserves are anticipated to last just 20 years, the biodiversity and climate values will last forever if well protected.[xi] In other words, developing oil reserves in the area will effectively preempt, if not destroy, the area's nascent yet economically promising tourism sector.

Unfortunately, the project's current construction is already causing negative biodiversity impacts. For example, oil and gas activities have driven elephants from the park, which are in turn forced to encroach into local communities. This has resulted in increased human-wildlife conflicts, the destruction of croplands, and at least five deaths in just one year.[xii] Light pollution related to an oil project drilling rig has disrupted the feeding and patterns of nocturnal and light-sensitive wildlife (e.g., leopards, lions, and birds, etc.), pushing traditional animal migration paths away from the park and unfortunately towards hazards which result in their deaths.

Moreover, the construction of roads in and near Murchison Falls has not only increased traffic, accidents, and air pollution, but introduces the area to new pressures on resources and markets. Studies have long shown that the construction of roads bears a multiplying effect in destroying and fragmenting forests and sensitive ecosystems[xiii]. In addition to facilitating oil production, new roads in Murchison Falls have been found to foster illegal wildlife trade, attract new, non-local workers which in turn place pressures on existing, scarce resources, as well as facilitate the transportation and sale of local commodities to new urban markets, such as fish. [xiv] Due to oil extraction in Murchison Falls, which is also recognized as a Ramsar site and Important Birding Area, [xv] the national park and Ramsar site is "dying".[xvi]

- **Local and Transboundary Water Impacts:** Communities are concerned about water related risks to sustaining fisheries, their property, safety and health, as well as the possibility of droughts resulting from the destruction of trees and vegetation.[xvii] The pipeline threatens Africa's largest freshwater basin, Lake Victoria Basin, which supports a population of 40 million people.[xviii] The Lake Victoria Basin sustains and impacts forests, mangroves, protected areas, fisheries, and livelihoods across Uganda, Kenya, and Tanzania. Nearly a third of EACOP will lie within the Lake Victoria Basin where a portion of the pipeline will come within five kilometers of Lake Albert, which is part of the Lake Victoria Basin. A potential failure of the pipeline at multiple points would affect the Lake Albert's water quality and jeopardize the groundwater which a significant local population relies upon. However, the ESIA does not adequately address trans-boundary social conflicts

which may arise, or become exacerbated, due to the project's impact in causing water shortages, pollution, or disrupting fisheries.

For instance, EACOP is expected to pass through critical sources of ground water in local communities across Uganda and Tanzania. These communities share concerns about the significant risks to some of their best sources of water.[xix] They have expressed publicly that impact mitigation strategies must be put in place to avoid restrictions on water flow and a guarantee must be made related to the integrity of the buried pipe during high flow events.[xx] Developing oil facilities in the area attracts new, non-local workers and migrants, which increases pressure on local resources such as water, and contributes to a decline in water quality and availability. For instance, increased pressure on water resources has heightened the risks of water-related disease outbreaks (e.g., typhoid, dysentery, and cholera) in project areas.

- **Oil spill and accidents**: It is impossible to guarantee that an oil pipeline will never lead to spills or accidents. However, the project's ESIA repeatedly downplays the risk of a spill or accident, and lacks sufficient analysis on how spills or accident may impact water quality.[xxi] For instance, neither the ESIA for Uganda or Tanzania acknowledges the risk of a potential oil spill impacting the Tanzanian World Heritage site, Ngorongoro Conservation Area (NCA). While the pipeline does not directly cross the NCA, both the pipeline's route and the NCA lie within Tanzania's Internal Drainage Basin (IDB)[xxii], a closed watershed where water does not flow to the sea. For instance, the Lake Eyasi Drainage Basin, part of the IDB and likely the closest to the NCA, is crossed by an estimated 235 km of the pipeline, with the shortest distance to the World Heritage site proper being approximately 100 km. Pollution of Lake Eyasi could significantly affect the NCA through their ecological, hydrological, and socio-economic connections, but these threats remain unidentified and unaddressed.

  Studies have advocated for a basin-wide approach to protecting the NCA, and highlight that "most of the Ngorongoro waters originate as rainfall outside the Crater, and travel into the basin as surface or ground water flow, emphasizing the need for a watershed-scale approach to land management."[xxiii] This suggests that an accident or spill along the pipeline could result in oil leakage flowing into and potentially concentrating within the World Heritage site. With Indigenous and local communities present not only in Ngorongoro but also in surrounding areas, further studies on the pipeline's impact on IDB are essential to safeguard water quality in this naturally dry region.

- **Fisheries and Local Livelihoods:** Approximately 60% of Uganda's population is engaged in fishing, agriculture, and forestry.[xxiv] In Tanzania, people depend on their land for water, farming, grazing, fishing, and mining. Since the pipeline will pass through or near important bodies of water in both countries, local livelihoods are at serious risk. [xxv]

  Lake Albert, mainly located in Uganda, supports the most diverse commercial fisheries in the country and is home to over 55 species, ten of which can only be found in the lake.[xxvi] The Uganda Bureau of Statistics shows that Lake Albert contributed 43% to the country's 2018 fish catch.[xxvii] This is significant as over five million people are directly or indirectly employed in Uganda's fisheries sector.[xxviii] In fact, one study found that most communities where the project pipeline passes are in rural areas with nearly 90% of household workers are farmers, herders, and fishers.[xxix] .

- **Climate Change risk:** EACOP will worsen and accelerate climate change. If built, the project will emit approximately 379 million tons of carbon dioxide over 25

years; this figure accounts for the full value chain of emissions from the transportation of crude oil via the pipeline and the oil's end use by customers around the world.[xxx] At its peak, the project's emissions will double the annual emissions of Uganda and Tanzania combined.[xxxi] This figure starkly contrasts with estimates presented by project developers.

According to an independent study, "The environmental assessments presented by the EACOP consortium, … only considered the impacts of the construction and operation of the pipeline, neglecting over 98% of the project's total emissions, including emissions from maritime transport of the crude oil to global markets, from its refinement into petroleum products, and, more significantly, from the end use of the oil by consumers." Given its tremendous climate impacts, EACOP will likely derail and contravene Uganda's commitments under the Paris Agreement. Supporting EACOP not only threatens Uganda's environment but also undermines global commitments to mitigating climate change. Notably, the oil produced by EACOP will be predominantly sold to overseas markets, and as such, will not tangibly improve or enhance Uganda's domestic energy grid.

Furthermore, it is well established that fossil fuels are driving climate change, and that the Global South, including Africa, are and will be disproportionately affected by climate change. The International Energy Agency's 2023 Net Zero roadmap stresses that no new oil and gas projects align with Paris Agreement goals, as energy security can be achieved from existing fields.[xxxii] The 2022 IPCC report confirms Africa's vulnerability[xxxiii], and a report from the International Energy Agency reiterates the urgent need to cut emissions to limit warming to 1.5°C[xxxiv]. Uganda, one of the most vulnerable nations to climate change, ranked 12th in climate vulnerability and 49th least prepared in the 2021 Notre Dame Global Adaptation Initiative Index[xxxv]. By enabling EACOP's development, Uganda will continue to suffer from the impacts of climate change due to the over-prioritization of fossil fuel interests over African communities.

Negative Social Impacts

- **Forceful and unjust land acquisition:** Independent research shows that EACOP has impacted 86,268[xxxvi] individuals in Tanzania and Uganda. There is clear evidence that project developers, which include CNOOC, systemically failed to inform and consult impacted communities, pressured landowners to forfeit their land without fair compensation, and have denied communities' rights to property for activities like farming; other affected communities report being denied the right to provide informed consent during the land acquisition process.[xxxvii] Some who filed grievances or simply found themselves in the wrong place at the wrong time, have been arrested, wrongfully detained, or threatened with legal action in connection with land-related disputes around the project.[xxxviii]

- **Inadequate and delayed compensation:** In 2023, research conducted by Ugandan organizations shows that the inadequate and delayed compensation by project developers has left many families displaced and in limbo, unable to replace

their lost land and livelihoods.[xxxix] For instance, the research surveyed impacted communities and found that seventy-eight percent considered the compensation they received as delayed, unfair, and inadequate.[xl] At the same time, nearly 97% of those who did receive cash compensation and able to purchase new land were ultimately unable to acquire land that was equivalent to what was originally appropriated for the EACOP project.[xli] The disorganized and chaotic resettlement and compensation process has directly impoverished impacted communities, with many suffering from lack of housing, food, and resources.[xlii] Instead of benefitting local communities, impacted communities have reported that the project has led to worse incomes, worse living standards, and worse social stability.[xliii] ,[xliv] ,[xlv]

Intimidation and Harassment: As a project developer, CNOOC is exposed to the social and reputational risks of associated with EACOP and its project co-developer, TotalEnergies. Research and news reports have documented that community members, human rights defenders, environmental defenders, and journalists critical of project oil activities have experienced harassment, intimidation, security threats, and retaliation for speaking out against the project, Total Energies, or the Ugandan and Tanzanian governments.[xlvi] These include arbitrary arrest and detention, including students who have protested.[xlvii] Another example includes a local protestor who was abducted and found beaten on the side of the road days later. [xlviii] Unfortunately, when local communities, students, and protestors have requested to meet with Chinese Embassy staff to hear concerns, there has been no response[xlix]; instead, activists and communities have been criminalized, harassed, and detained for attempting to engage the Chinese Embassy.[l]

Concerningly, community members have expressed fear of retaliation, which prevents them from speaking freely and openly about the project and engaging meaningfully with project sponsors.[li] This has in turn led to the coercion and intimidation of landowners during the land valuation and acquisition processes.[lii] Moreover, there are numerous documented instances of judicial harassment, including arrests that constitute a pattern of harassment and persecution by state officials; for instance, over 50 non-governmental organizations have been ordered to halt operations by the Ugandan government for speaking out.[liii] The situation has deteriorated so greatly that through 2020 and 2022, the United Nations (UN) Special Rapporteurs communicated their concerns directly to TotalEnergies, the French government, as well as the Ugandan government about the project's effect in fostering intimidation, harassment and a climate of fear amongst communities and the public.[liv]

Furthermore, in 2024, the African Commission on Human and People's Rights also highlighted the improper use of government force in arbitrarily detaining, harassing, and intimidating local critics, including protestors which demonstrated at the Chinese Embassy. The Commission called on the Ugandan government to: "ensure" the full rights of citizens, per the Ugandan Constitution, and to "cease" the "arbitrary arrests, detentions, ill treatment and harassment of activists exercising these fundamental rights and freedoms".[lv]

- **Lack of Transparency and Credible Assessments:** Although technical documents have been published online, there are still transparency concerns regarding how key information is disclosed and shared. According to impacted communities, project consultations have been largely used to legitimize oil activities and attract international funding, rather than share and disclose relevant information to affected communities.[lvi] Despite consultations, many impacted communities in Uganda reported that there was insufficient information regarding land compensation rates, compensation processes, cut-off dates for valuation, commencement dates for the

pipeline project, grievance mechanisms, and environmental and social risks.[lvii] Others expressed concern about the lack of information and training about disaster management strategies, including early warning signs in case fires or oil spills, leading to uncertainty and fears.[lviii] This is despite various commitments by project sponsors to ensure transparency and access to information for all affected stakeholders.[lix]

Furthermore, an independent analysis of the project's environmental impact assessment (EIA) found there was a significant bias in stressing positive impacts, while minimizing negative impacts.[lx] The study found major gaps in ESIA's analysis, concluding that the assessment was not robust, comprehensive, or transparent, which are considered key components in ensuring credible, accurate EIAs[lxi] The lack of a valid, credible, accurate, and robust EIA further emphasizes the likelihood that it will be difficult for financiers to appropriately evaluate the project and its risks, given such major gaps.

Legal Violations

- **EACOP's legal challenges:** Several legal challenges at the international,[lxii] regional,[lxiii] and domestic[lxiv] levels have been initiated against EACOP and its associated Tilenga Oil project, which is also being co-developed by Total Energies and CNOOC. [lxv] Although CNOOC is not directly included in these lawsuits, it is clear that associating with Total Energies and EACOP exposes CNOOC to unnecessary reputational harm and legal risk.

  For instance, Ugandan, French, and other organizations filed an **international lawsuit against Total under the French Duty of Vigilance law in France**, alleging TotalEnergies' failure to identify and map the risk of human right violations and environmental harm associated with its Tilenga operations.[lxvi]

  On a regional level, African groups filed a case against the governments of Uganda and Tanzania, along with the Secretary General of the East African Community (EAC), requesting an urgent injunction to halt pipeline development. The lawsuit was filed at the **East African Court of Justice, a regional judicial body tasked to ensure adherence to and compliance with the East African Community Treaty of 1999**. The plaintiffs argued the project violates several key East African and internation laws, including the East African Treaty, the Protocol for Sustainable Development of the Lake Victoria Basin, the Convention on Biological Diversity, and the United Nations Framework Convention on Climate Change. [lxvii]

  The oil project is also facing **lawsuits domestically, with affected individuals alleging that the Ugandan government violated Article 26 the Ugandan Constitution** by failing to ensure fair, adequate compensation to project affected communities.[lxviii]

Violations of International Norms and Standards

- **Violations to the International Finance Corporation Performance Standards and Equator Principles:** EACOP's project developers, including CNOOC, have committed to adhering to the Equator Principles and all eight of the

International Finance Corporation (IFC) Performance Standards (PS) in developing the pipeline. According to EACOP's website, it claims that "EACOP either meets or is on track to meet all 8 IFC Performance Standards", and that there are "No 'red flag' items"[lxix].

However, based on the above mentioned impacts, evidence shows that the project is resulting in tangible harms which go against the IFC PS. For instance, an independent study found major violations to at least five of the IFC PS. These include inadequate assessment of environmental and social risks (IFC PS 1), failure to avoid and minimize impacts on health and pollution (IFC PS 3), failure to avoid and minimize impacts on community health, safety and security, including impacts on ecosystem functions (IFC PS 4), improper and inadequate land acquisition and resettlement processes (IFC PS 5), irreversible harm to protected areas and natural resources (IFC PS 6).[lxx] The review further found evidence of lack of compliance with the Equator Principles (EPs) — an international benchmark for managing environmental and social risks. The study found violations to Equator Principles relating to the assessment and management of environmental and social risks (EP 2), stakeholder management (EP 5), and grievance mechanisms (EP 6).

- **Violating the Paris Agreement:** As a fossil fuel project with significant estimated emissions (see the climate change risks above), EACOP will also violate the Paris Agreement, of which China, Tanzania, and Uganda have signed.

- **Violating protected areas, such as national parks, World Heritage, and Ramsar sites:** Oil extraction at the Kingfisher Oil Field in Murchison National Park is already devastating the protected area, which is unfortunately the first oil project in a protected area in East Africa.[lxxi] Although technically legal, it is clear that oil activities are degrading the park, as wildlife have been recorded fleeing from the park to unsafe areas, fostering human-wildlife conflicts.[lxxii]

  In addition, EACOP's proposed route may negatively impact the Ngorongoro National Park in Tanzania, a World Heritage site, as well as the Murchison Falls-Albert Delta Wetland System, a designated Ramsar site (which overlaps with Murchison National Park).[lxxiii] Tanzania and Uganda are Parties to the World Heritage Convention and members of the Ramsar Convention, binding them to provisions to safeguard the integrity of these areas. As mentioned earlier, located approximately 100km from the World Heritage site, potential oil spills or accidents may pollute the World Heritage site due to the unique hydrological features of the region, in which water run off, or oil pollution, drain directly into the World Heritage site.

Violations of Chinese Policies

It is clear that EACOP is already leading to negative environmental and social impacts, in which impacted communities claim that the pipeline activities are directly impoverishing, instead of benefitting them. Chinese regulations and policies on overseas investments are clear in expecting Chinese companies and financiers to promote environmental protection and align with communities in producing "win-win" outcomes for local and Chinese actors. By supporting any EACOP project developers, China Exim and Sinosure will fail to comply with several Chinese policies and regulations, including:

- **Green Finance Guidelines:** China's 2022 Green Finance Guidelines[lxxiv] establish basic expectations of how Chinese financial institutions should use their

investments to promote "environmental and social benefits". This is reflected in Article 1 and 4, which calls for the banking and insurance industries to "advance…carbon neutrality" and "identify, monitor, prevent and *control* ESG risks in their business activities" [italics added]. Article 12 expands on the role of Chinese financiers to reduce climate change via their portfolios by explicitly calling on them to "resolutely curb the blind development of high energy consuming, high emission, and low quality projects…[and] reduce the carbon intensity of asset portfolios…so that their asset portfolios can be eventually become carbon neutral". Although oil produces comparatively lower emissions than coal, it is important to remember that new fossil fuel infrastructure such as EACOP will lock in decades of emissions, which numerous international and independent studies have shown to be not-aligned with targets set by the Paris Agreement. As such, it is reasonable to consider fossil fuel projects as "low quality", given their incompatibility with international and African countries' own climate commitments.

Furthermore, Article 19 requires financial institutions to review and confirm if client provided documents are "regulation compliance, valid, and complete, and ensure that the customer has given sufficient attention" to effectively "control" key risk points and "meet substantial compliance requirements". In light of EACOP's ongoing negative impacts, legal troubles, inadequate environmental assessments, and failure to adhere to project finance standards such as the IFC PS and Equator Principles (which the project developers themselves adopted), it is fair to conclude that CNOOC and co-developer Total have failed to meet Article 19 requirements, given the lack of valid documents and lack of compliance. Furthermore, if financed activities violate laws or regulations, or result in "major" environmental, social, or governance risks, Article 20 states that Chinese financiers must ultimately "strictly restrict" credit and investment to those clients. Article 22 further states that "for a project that shows significant risk or potential hazards, fund appropriation can be suspended or terminated according to contract terms." Given the current situation and the project developers' failure to address let alone resolve negative impacts, it is reasonable that no funds should be provided to support EACOP, as based on the guidelines.

Notably, although project developers like CNOOC may claim that various environmental and social risks may be controllable, whether through the adoption of international project finance standards or other means, adopting additional risk management strategies does not inoculate an ill-conceived project from negative impacts. Instead, doing so may only provide the illusion of managing while having little impact on negative impacts which are inherent to the activity itself.

For example, in the case of the Lamu coal plant in Kenya, which was initially set to be financed by ICBC, the bank adopted the Equator Principles as a risk management strategy. However, doing so did not address let alone resolve the core problem of the project, which was the fact that coal plants produce the highest amount of greenhouse gases, and that local communities categorically rejected coal. After years of investment, ICBC eventually pulled out of the Lamu coal plant, which also did not meet the expectations and requirements of the Green Finance Guidelines predecessor, the Green Credit Guidelines. Past examples like this shows that compliance with policies like the Green Finance Guidelines, or lack of, is an effective indicator of the high or low quality of Chinese financed activity abroad.

- **List of Sensitive Sectors for Overseas Investment**: Published in 2018 by China's National Development and Reform Commission, this policy prohibits Chinese investments which involve trans-boundary water risks. As mentioned earlier, EACOP includes the extraction of oil in Murchison Falls National Park, which is located in the Lake Victoria Basin. The Lake Victoria Basin sustains forests, mangroves, protected areas, fisheries, and livelihoods across Uganda, Kenya, and

Tanzania. As such, pollution related to oil extraction near Lake Albert, which is part of the Lake Victoria Basin, may trigger negative, transboundary impacts.[lxxv]

- **Chinese Belt and Road Principles and Policies:** China has recently introduced a series of policies to enhance the environmental sustainability of its Belt and Road Initiative (BRI). Since 2022, efforts to green the BRI have become more prominent. For instance, the publication of the "Opinions on Jointly Promoting Green Development of the Belt and Road[lxxvi] establishes principles for Chinese institutions to respond to local demands for green development and environmental protection. The importance of promoting environmental protection was reiterated by President Xi's 2017 call to "pursue the new vision of green development"[lxxvii]. The President reiterated the importance to promote green development in 2023[lxxviii] when the initiative marked its ten years anniversary. However, the project developers implementation of EACOP, including CNOOC, does not align with local priorities or demands, as the vast majority of impacted communities oppose and reject the pipeline. Instead of as "green development", testimonies from impacted communities and legal troubles point to EACOP as a symbol of low quality, harmful development which benefit project developers, instead of local communities in Africa.

- **Chinese policies related to climate change and fostering win-win relations:** China has embarked on its own decarbonization journey since announcing its climate goals, demonstrating both domestic and international commitment to a low-carbon future. Domestically, China has pledged to peak carbon emissions by 2030 and achieve carbon neutrality by 2060.[lxxix] Internationally, in 2021, China announced it would cease financing new coal-fired power plants overseas, a move widely recognized as a bold step toward reducing global reliance on fossil fuels. In this context, continued engagement in fossil fuel projects such as the EACOP represents a deviation from China's climate ambitions.

  Furthermore, numerous Chinese policies related to overseas investments are clear in the mandate to foster "win-win cooperation"[lxxx]. This reflects an astute awareness that Chinese overseas investments must not only benefit Chinese stakeholders, but also local communities and the public as well. President Xi Jinping has highlighted the importance of doing so, stating in 2015, "Only through win-win cooperation can we make big and sustainable achievements." [lxxxi] Fostering win-win relationships is a core principle evident in China's overseas policy framework, yet it remains challenging for Chinese companies and banks to implement in practice, due to failures to adequately respond, adjust, and potentially withdraw when it becomes clear that local communities reject a Chinese sponsored project. It also reflects the common conflation of local government approval and consent to a project with the approval and consent with the public and local communities. This is the case for EACOP. When these tensions occur, it is critical to defer to the wishes of the local communities and public, as failure to do so drives further risks, delays, costs, and negative impacts, while simultaneously disregarding the clear Chinese mandate to support activities which lead to mutual benefits.

- **Guidelines for Green Development in Foreign Investment and Cooperation:** In 2021, China's Ministry of Commerce and the Ministry of Ecology and Environment jointly issued the Guidelines for Green Development in Foreign Investment and Cooperation[lxxxii], which set a clear direction for promoting environmental sustainability in Chinese overseas investment. The Guidelines calls for investment to showcase "China's leadership in global endeavor towards green transition" and "build a clean, low-carbon" energy mix. However, the environmental and social impacts of EACOP thus far, and the project developers' failure to address them, indicates a lack of alignment with this policy. This is because investing in

fossil fuel projects does not show global leadership towards accelerating a green transition.

- **Guidelines for Ecological Environmental Protection of Foreign Investment Cooperation and Construction Projects:** In 2022, the two Chinese Ministries published the Guidelines for Ecological Environmental Protection of Foreign Investment Cooperation and Construction Projects[lxxxiii]; this policy established guidance for assessing, managing and preventing environmental and ecological harms when investing abroad. Although pertaining to Chinese companies, this policy is relevant to financiers considering providing finance to the project, as it indicates the project developers' historic poor environmental and social performance, given the ongoing negative impacts of EACOP. The policy particularly notes measures to protect biodiversity. For instance, Article 10 and 13 require companies to avoid occupying and passing through nature reserves and important wildlife habitats. However, as referenced earlier, independent studies have questioned the need for the pipeline to cut through certain protected areas or critical habitat, and the failure of project developers to consider alternative routes.

Conclusion

Instead of extracting resources from Uganda, China should be encouraging the Ugandan and Tanzanian governments to protect its natural heritage, landscapes, and the people who depend on them. So we hope that Chinese financiers and institutions will work with our governments to promote renewable energy. For instance, investments in off-grid solar or wind can help our countries provide power and fight climate change. These kinds of energy alternatives meet the needs of everyday people, especially vulnerable groups like women, girls, youth, poor communities, and others. There are also other ways Chinese and African stakeholders can work together: there are already calls for China to support the Ugandan government help establish the African Great Lakes, including Lake Albert and Lake Victoria, to become World Heritage sites, instead of dooming the region to short-sighted extractive activities[lxxxiv]. As African organizations we ask Chinese actors to support our vision for clean energy alternatives.

As such, we urge your administration to prevent all Chinese financial institutions, including the Export-Import Bank of China, Sinosure, and ICBC, from supporting EACOP, in addition to other associated fossil fuel projects in Uganda and Tanzania. If funds have already been committed, we strongly ask that the NFRA work with each institution to re-evaluate, suspend, cancel, or require immediate repayment of any current or planned funds which support EACOP.

We welcome an opportunity to discuss our concerns. To contact the undersigned, please email our representative, Strategic Response on Environmental Conservation on info@strecug.org or ckabaale@strecug.org

Sincerely,

SIGNATORIES

1. Strategic Response on Environmental Conservation (STREC)

2. Youth for Green Communities (YGC)
3. National Association of Professional Environmentalist (NAPE)
4. Centre for Citizens Conserving Environment &Mgt (CECIC)
5. Center for Conservation and Ecoenergy Initiative (CCEI)
6. Environment Governance Institute (EGI)
7. Alerte Congolaise pour l'environnement et les droits de l'homme, ACEDH, DR Co ngo
8. African Initiative On Food Security and Environment (AIFE)
9. African Institute for Climate Action and Justice Limited(AFICAAJ)
10. Coalition des Organisations de la Société Civile pour le Suivi des Réformes et de l'Action Publique, CORAP - DR Congo
11. The Women Support Initiative (TWOSI)
12. Be Empowered
13. Women in Renewable Energy Initiative -Uganda
14. Africa Centre for Sustainable Alternative (ACSA)
15. Initiative for Green Planet (IGP)
16. Tasha Research Institute Africa (TASHA)
17. Synergie des Jeunes pour le Développement et les Droits Humains, SJDDH/RDC
18. Center for Environmental Research and Agricultural Innovations (CERAI)
19. East African Crude Oil Pipeline Host Communities (EACOP HC)
20. Student Against EACOP
21. Greater Masaka Youth for Green Initiative (GMYGI)
22. Women Natural Resources Action Initiative
23. Kingfisher Host Community Network
24. EACOP Host Community Network
25. Bunyoro Youth for Green Initiative
26. Stride for Green Initiative (SGI)
27. Cadre de Concertation de la société civile de l'Ituri sur les Ressources Naturelles (CdC/RN) - DR Congo
28. Forum des Engagés pour le Développement Durable (FORED) DR Congo
29. Association d'Entraide pour le Développement Intégral de la Femme (AEDIF) DR Congo
30. Association des Filles Mères (AFEM) DR Congo
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