



## Uganda

TotalEnergies EP Uganda

O/Ref : DG 2024/2-551

**Subject: Response to XR Nederland, Christian Climate Action, Justice movement Uganda further to their request regarding EACOP.**

Kampala, April 3, 2024

Dear Sir,

We confirm reception of your letter dated February 24<sup>th</sup>, 2024, and are pleased to provide you with the below information about the Tilenga and EACOP Projects.

As a general point of clarification, there are three separate but interconnected projects:

- Two are oil production projects located in Uganda, namely Tilenga and Kingfisher. The Tilenga project is operated by TotalEnergies EP Uganda (TEPU), while the Kingfisher project is operated by CNOOC. These two projects have a common ownership, in the form of contractual Joint Ventures between UNOC (Uganda National Oil Company), TotalEnergies EP Uganda and CNOOC.
- The purpose of EACOP (East African Crude Oil Pipeline) is to transport the oil produced by Tilenga and Kingfisher from Kabaale, in Uganda, Hoima district, to the port of Tanga on the Indian Ocean coast in Tanzania by constructing a fully buried pipeline. More details are available at <https://eacop.com/overview/>. The pipeline will be constructed and operated by EACOP Ltd, a company whose shareholders are TotalEnergies, UNOC, TPDC (Tanzania Petroleum Development Company) and CNOOC.

In addition to abiding by the Laws of Uganda and Tanzania, the projects comply with international best practices including the International Finance Corporation (IFC) Performance Standards, the Equator Principles IV, the UN Guiding Principles on Business and Human Rights (UNGP) and the UN Voluntary Principles on Security and Human Rights (VPSHR).

Referring to your letter, please find below our specific responses:

### 1. Human Rights

Taking note of your concern to *"respect the human rights of all people involved or affected and help guarantee the safety of climate justice activists in Uganda and Tanzania"*, please refer to the link ([https://corporate.totalenergies.ug/system/files/atoms/files/human\\_rights\\_policy.pdf](https://corporate.totalenergies.ug/system/files/atoms/files/human_rights_policy.pdf), <https://eacop.com/human-rights-policy/>) where you will find information about the Tilenga and EACOP projects (The Projects) commitment to

Uganda Branch: Plot 21, Yusuf Lule Road, Postal address: P.O. Box 34867, Kampala, Uganda  
Tel: + 256 (0)312 426 000

TotalEnergies EP Uganda Simplified Joint Stock Company Registered capital: €40,000  
2 Place Jean Millier La Défense 6 92400 Courbevoie France, Companies' Register Nanterre R 920 130 440,  
Companies' Register Nanterre





respect Human Rights and applicable laws in all activities aligned with the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact Principles, the OECD Guidelines for Multinational Enterprises, the fundamental conventions of the International Labour Organization and the Voluntary Principles on Security and Human Rights.

The projects are committed to the respect of human rights, including the right to freedom of expression and assembly as stated in their respective Human Rights Policy. They maintain regular engagements with Government Security Forces to promote the respect of these rights. When the Projects become aware of demonstrations, the Projects mobilize staff to the site of the rally to seek to engage with protestors and understand their concerns and receive their petition if any.

Furthermore, whenever the Projects are alerted of allegations of threats, intimidation, harassment, or violence against Human Rights Defenders in relation to their activities, the internal Country Security team follows up on the cases with the relevant authorities to recall the importance of respecting the human rights of the arrested protestors.

As an example, on the 24<sup>th</sup> of November 2023, the Country Security team in Uganda, was informed by some contacts about the arrest of 7 Anti-EACOP protestors at the Parliament of Uganda. Immediately, a security coordinator was sent to the Kampala Central Police Station (CPS) to meet with the Officer in Charge and to ensure their rights and integrity were respected. Later, the Country Security team follow the cases and regularly met the activists at the prison, including 4 others that were arrested in connection with the same issue, as no sureties were given to grant bails for all of them.

Both Projects make public their Human Rights reports:

<https://totalenergies.ug/tilenga-project-human-rights-reports-documents>

<https://eacop.com/human-rights>

## **2. Land acquisition process**

The land acquisition process is carried out on behalf of the Ugandan and Tanzanian governments in close collaboration with specialized partners and local stakeholders and done in accordance with national laws and aligned with the UN Guiding Principles on Business and Human Rights, and IFC Performance Standards. Independent experts have also assessed performance and implementation against these standards, and a summary of their findings is published on EACOP website. <https://eacop.com/report/environment-and-social-due-diligence-esdd-non-technical-summary-nts/>

Resettlement action plans were developed in collaboration with relevant authorities and local stakeholders. These plans outline the procedures and measures to be followed to mitigate potential negative effects, compensate for losses, and provide development benefits to individuals and communities affected by the projects. Again they are made public. <https://eacop.com/land-acquisition>

The Projects required the acquisition of 6,400 hectares of land, impacting 19,140 households. Of these 775 households (4% of the total, altogether around 5,000 people) had their primary dwelling on the affected land and were thus offered a choice of replacement housing or cash compensation. The other 96% were 'economically



impacted' meaning that the project footprint impacted their land, crops, trees and structures, and were thus entitled to compensation at full replacement cost.

As of end of February 2024, 99% of compensation agreements have been signed, 98% of households have been compensated and 98% of affected households have moved into their new residences. Activities are now focused on post acquisition support as required under IFC PS5, namely:

- Distribution of food to eligible households known as 'transitional support' and typically provided for a period of 6-12 months.
- Delivery of 'Livelihoods Restoration Programs' to eligible households based on the following pillars:
  - agricultural and animal husbandry related programs (such as improving crop yields, vegetable cultivation, tree planting/commercial nursery, beekeeping...).
  - Vocational training and finance/business management.

Grievance mechanisms respecting the UNGPs criteria of efficiency have been in place since the beginning of the projects. Dedicated teams provide remedy to the grievances that are received and make sure they are solved in a satisfactory manner for the impacted persons. There are several ways to file a complaint: either with the EACOP or TotalEnergies EP Uganda teams in the field, or with local communities' leaders, or via a dedicated toll-free phone number. Community Liaison Officers (CLOs) are available to register all project-related grievances including those related to compensation, and to help to resolve them. There is a four-step procedure in place to handle complaints: registering the complaint, dialogue once the investigation is completed to discuss the proposed solution, the resolution phase if the proposed solution is accepted, and a continued dialogue phase if the proposed solution is not accepted. All complaints are investigated and dealt with regardless of the route used to file the complaint and regardless of who was initially called upon to register the complaint. At end February 2024, 98% of the grievances received were closed.

### **3. Climate change**

In 2020, TotalEnergies has set itself an ambition to get to net zero across its worldwide operations by 2050, together with society. TotalEnergies investments in new fossil fuel projects are focused on low cost, low emissions projects.

The Company strives to reduce the greenhouse gas emissions generated by its activities and this applies to the Tilenga and EACOP projects, whose Scope 1 and 2 emissions are far lower on average than other projects in Africa (13kgCO<sub>2</sub>e/boe compared to 60kgCO<sub>2</sub>e/boe, average emissions according to International Energy Agency). TotalEnergies has implemented concrete solutions (e.g. solarization of facilities, zero flaring and recovery of the gas produced) to reduce the two projects' Scope 1 and 2 emissions of the Projects.

### **4. Biodiversity**

Referring to your concerns that "oil Extraction will directly impact Murchison National Park seriously threatening ecosystems, biodiversity and endangered species", please note the following:



- A large number of surveys have been carried out to examine the impacts of the Projects and made public. This is the case, for example for the Environmental and Social Impact Assessments (ESIAs) for the projects in Uganda and Tanzania.
- TEPU voluntarily chooses to restrict the project's surface area within the precinct of the Murchison Falls Park in Uganda. Development will therefore be limited to less than 0.03% of the park's surface area.
- TEPU is also in the process of implementing the Biodiversity Ecosystem Services Action Plan which aims to achieve net positive impact. It has four key pillars to help protect and enhance the biodiversity of the Albertine Region. In practice, this means by 2045:
  - Increasing the populations of key indicator species (lions and elephants) by 25% within Murchison Falls Protected Area.
  - Maintaining the populations of antelopes (Lelwel Hartebeest, Uganda Kob) and the Nubian Giraffe.
  - Protect and enhance the integrity of important habitats through invasives species management.
  - Restoring 500ha of degraded wetlands, 1,000 hectares of degraded forests and protecting 10,000ha of remaining forest within the forest corridor.

For the EACOP project, the pipeline route was designed to minimize its impact on the landscape and biodiversity. The pipeline will be fully buried and does not cross any IUCN protected area or Ramsar zone. Once trenched, installed and buried, the route topsoil and vegetation will be restored to its natural state and people and animals will be free to cross unimpeded.

We very much hope that all these responses address your concerns.

Yours sincerely,

**Philippe GROUEIX**  
General Manager

**Martin TIFFEN**  
Managing Director EACOP