

Assessment of East African Crude Oil Pipeline (EACOP) and Associated Facilities' Compliance with Equator Principles and IFC Performance Standards

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On the cover: Murchison Falls, Murchison Falls National Park, where oil drilling will occur. Photo by [Rod Waddington](#); [licensed under CC BY-SA 2.0](#).

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Executive Summary

The Tilenga and Kingfisher oil fields are located onshore on the eastern perimeter of the Lake Albert basin, which lies on the border of Uganda and the Democratic Republic of the Congo. The Tilenga field, the larger of the two sites, sits at the north end of Lake Albert while the Kingfisher field lies at the south end. As currently envisaged, two central processing facilities near each oil field would collect crude oil, which would be passed through a feeder pipeline system to the Kabaale industrial park, the site of a proposed oil refinery. There, a portion of the crude oil would be processed for domestic and regional consumption.ⁱ The bulk of the oil, however, would be transported southeast via the East African Crude Oil Pipeline (EACOP) for export through Tanzania’s port of Tanga.ⁱⁱ

The proposed EACOP consists of a buried 1,443km crude oil pipeline, stretching from the town of Kabaale in Uganda to the port of Tanga in Tanzania. The project also includes a storage terminal and loading jetty in Tanga. The waxy consistency of the crude oil from Tilenga and Kingfisher requires the pipeline to be heated to a temperature of 50°C or more for transportation.ⁱⁱⁱ If built, the EACOP would be the longest electrically heated pipeline in the world.

This assessment finds that serious human rights impacts have already occurred before commercial extraction and construction of the pipeline has even begun.

The oil project, which encompasses the Tilenga and Kingfisher upstream oil projects and the EACOP, is being carried out by transnational corporations TotalEnergies and China National Offshore Oil Corporation (CNOOC), alongside the national oil companies of Uganda and Tanzania (hereinafter referred to collectively as the “project sponsors”). TotalEnergies operates the Tilenga oil field, while CNOOC operates the Kingfisher field.¹ The EACOP ownership structure is as follows:^{iv}

- TotalEnergies (62%)
- Uganda National Oil Company (UNOC, 15%)
- Tanzania Petroleum Development Corporation (TPDC, 15%)
- China National Offshore Oil Corporation (CNOOC, 8%)

This report assesses the EACOP and associated oil fields against the Equator Principles, a set of voluntary guidelines adopted by financial institutions to ensure that large scale development or construction projects appropriately consider the associated potential impacts on the natural environment and the affected communities. As part of this assessment, the report also considers the project’s compliance with the Environmental and Social Performance Standards of the International Finance Corporation, upon which the Equator Principles are based. The project sponsors have committed that the project will comply with the Equator Principles and will need to ensure Equator Principle compliance in order to secure project financing from signatory banks.

¹ Ownership of the upstream component of the project (Tilenga and Kingfisher oil fields) is as follows: TotalEnergies (56.67%), CNOOC (28.33%), and UNOC (15%). This joint ownership is distinct from the ownership structure of EACOP, which includes the Tanzanian national oil company. See: [TotalEnergies](#), “Uganda and Tanzania: launch of the Lake Albert Resources Development Project”, February 2022.

The assessment finds that serious human rights impacts have already occurred before commercial extraction and construction of the pipeline has even begun. The construction and operational phases are expected to cause additional serious adverse impacts to communities within the oil extraction and pipeline areas, including by placing at risk the water resources relied upon by millions of people, and irremediably degrading the livelihoods of farmers, fisherfolk and tourism business owners that depend upon the region's rich natural resources. The projects will also result in extensive and irreversible environmental damage within Murchison Falls National Park and numerous other protected areas. Moreover, the projects will enable the extraction and transport of enough oil to generate 34 million metric tons of additional carbon emissions per year at peak production, significantly more than the current combined emissions of Uganda and Tanzania.

Specific breaches of the Equator Principles revealed by this analysis include:

- **Shortcomings in Project-Related Assessments and Consultation Processes (page 7).** The requirements of Principle 5 on stakeholder engagement do not appear to have been sufficiently met; assessments and reviews were kept confidential for years and only disclosed after key project-related agreements had been signed; the alternatives analysis fails to meet the criteria set out in the Equator Principles as it makes no reference to options to reduce project-related greenhouse gas emissions nor calculation of the project's expected greenhouse gas emissions; the grievance mechanism that exists is ineffective and not equipped to resolve the serious human rights abuses present; and several major contracts and project-related documents have never been disclosed.
- **Improper Handling of Hazardous Waste and Oil Spills (page 11).** The project fails to apply "best available techniques" to prevent and mitigate degradation of ecosystems, choosing to employ low-cost technology for oil drilling and water crossings; despite the project posing significant risks to water sources relied upon by local communities, the EACOP Environmental and Social Impact Assessment (ESIA) does not contain a robust oil spill emergency response plan, in non-conformance with Performance Standard 3 and 4; hazardous waste disposal for the Tilenga project is outsourced to inexperienced local contractors with no track record in successful operation of hazardous waste landfills at the required standard.
- **Threats and Retaliation Against Human Rights and Environmental Defenders, and Community Leaders (page 13).** The project sponsors have failed to effectively identify and mitigate safety risks to community members, human rights and environmental defenders, and journalists critical of the project, in apparent non-conformance with Performance Standard 4.
- **Improper Land Valuation, Acquisition and Compensation Processes (page 14).** The requirements of Performance Standard 5 on land acquisition and involuntary resettlement do not appear to have been sufficiently met, particularly in relation to the obligation to minimize the time between cut-off dates and compensation/resettlement; affected communities have experienced significant restrictions on the use of their land while awaiting

compensation; inadequate consultation has resulted in inadequate compensation rates; and communities report inaccuracies and inconsistencies in the valuation and assessment of assets for compensation, including instances where valuation forms were signed under duress.

- **Harm to Protected Areas and Natural Resources (page 18).** The project design and placement makes impacts to critical habitats and protected ecosystems unavoidable and impossible to adequately mitigate; the drilling technique employed at the Tilenga site and the decision to include 10 well pads, corresponding to 130 oil wells, within Murchison Falls National Park does not represent an attempt to utilize “best available technique,” to avoid, mitigate and offset environmental impacts; the decision to locate the Kingsfisher central processing facility and well pads within the sensitive area of Buhuka Flats does not represent “best available technique”; the EACOP project employs the lowest-cost option for water crossings despite posing a risk to critical freshwater supplies; the project does not appear to conform with Performance Standard 6 due to the risks posed to ecosystem services that support community livelihoods, including fishing.

In the preamble of the Equator Principles, Equator Principles Financial Institutions (EPFIs) commit to fulfilling their responsibility to respect human rights in line with the UN Guiding Principles on Business and Human Rights, to supporting the objectives of the 2015 Paris Agreement when assessing the potential transition and physical risks of projects financed under the Equator Principles, and to supporting conservation with the aim of enhancing the evidence base for research and decisions related to biodiversity. Due to the severe human rights, climate and biodiversity risks and impacts of the oil projects, and the clear lack of broad community support, in the context of a repressed civic space in Uganda and Tanzania, it appears impossible for the projects to substantively meet these objectives and requirements of the Equator Principles. EPFIs and other companies and institutions that apply these and other international standards, including the OECD Guidelines on Multinational Enterprises, to their investments would be in breach of their commitments by providing support to these projects.

Applicability of the IFC Performance Standards and Equator Principles

Two EPFIs, Standard Bank and Sumitomo Mitsui Banking Corporation (SMBC), are acting as financial advisors for the EACOP project. A third Equator Principles institution, Standard Chartered, is currently conducting due diligence on the project.^v As such, the EACOP project must be carried out in compliance with the Equator Principles. Standard Bank has publicly stated that its participation in the project remains subject to the findings of environmental and social due diligence assessments of the project’s compliance with the Equator Principles.^{vi}

Under the Equator Principles, all EPFI-financed projects located in non-designated countries must comply with the IFC Performance Standards on Environmental and Social Sustainability (IFC Performance Standards).^{vii} The list of non-designated

countries under the Equator Principles includes Uganda and Tanzania, where the EACOP is located.^{viii} Therefore, the EACOP must comply with the IFC Performance Standards.

While the Tilenga and Kingfisher projects are not financed under the project finance facility for EACOP, they are considered associated facilities of the EACOP project, and thus must also conform with the IFC Performance Standards, according to TotalEnergies' own assessments.^{ix} Total and CNOOC have committed to adhere to the IFC Performance Standards, and TotalEnergies has stated publicly that the Tilenga and EACOP projects "have been carried out in compliance with the exacting standards of the International Finance Corporation."^x

Summary of Risks and Impacts

The risks and impacts already caused by the oil fields and pipeline are immense, and have been exhaustively documented in numerous community-based impact assessments^{xi} and independent expert studies.^{xii} Local and global opposition to the oil projects is robust and vocal, despite the air of intimidation and fear surrounding the developments.^{xiii} For instance, a transnational campaign to stop the construction of the EACOP has grown over the past several years.^{xiv} Several legal challenges at the international,^{xv} regional,^{xvi} and domestic^{xvii} level have been initiated against the Tilenga and EACOP projects. At the time of writing, 20 commercial banks and eight major reinsurers and insurers have publicly ruled out support for the project, many due to environmental and social concerns.^{xviii}

The oil fields lie in one of the most uniquely sensitive and ecologically diverse areas of the world, at the crossroads of Lake Albert, Africa's seventh largest lake and the headwaters of Africa's main basins for the Nile and Congo rivers; the Murchison Falls National Park, Uganda's largest protected nature reserve; and the Murchison Falls-Albert Delta Ramsar wetland system, a wetland protected under international law.^{xix} The Tilenga oil extraction site includes the drilling of 130 oil wells within the boundaries of the national park, an area which hosts several endangered and vulnerable species, and is central to Uganda's tourism industry.^{xx} It is estimated that over one million people in the Murchison landscape depend upon it for fishing and water, while Lake Albert alone is the largest contributor to Uganda's fishing industry, sustaining an estimated 43% of the country's fisheries.^{xxi}

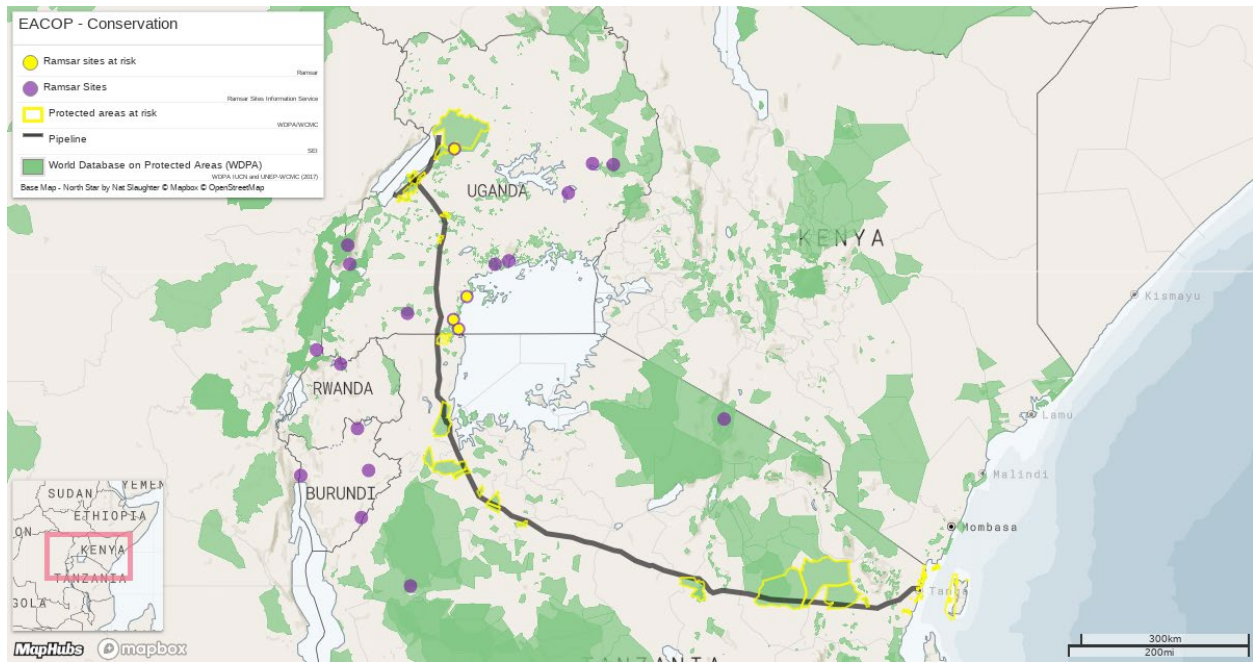
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Fishing activities at Lake Albert, where oil extraction will take place. Credit: Amis de La Terre / Lambert Coleman

The EACOP route traverses numerous diverse ecosystems and human settlements, with one-third of the pipeline running alongside the world's second largest freshwater lake and the largest lake in Africa, Lake Victoria—a critical water source for more than 40 million people (see map on page 6).^{xxii} The pipeline will pass through seven forest reserves, two game reserves, two game-controlled areas and one open area that supports wildlife management, covering a total of 295km of conserved and protected lands. Nearly 2,000 square kilometers of protected wildlife habitats will be negatively impacted by the EACOP.^{xxiii}

The government and the international oil companies have pushed their plans forward without adequately consulting local communities and without sufficient safeguards to address the ecological and human rights risks of the oil projects,^{xxiv} which many believe are so extreme and vast that they are unmanageable. In September 2020, the human rights organizations International Federation for Human Rights (FIDH) and the Foundation for Human Rights Initiative (FHRI) undertook a community-based human rights impact assessment of the oil fields, pipeline, and proposed oil refinery. The assessment documents numerous serious violations of local communities' rights—including rights to land, housing and an adequate standard of living, the right to health and clean water, and the right to a healthy environment—that had already occurred at early stages of the projects. Numerous other expert reports and community-based assessments have documented similar ongoing abuse and risk of irreversible harm.^{xxv}



Each of the interrelated oil projects require large-scale land acquisition, resulting in the physical and economic displacement of communities. Roughly 13,000 households across Uganda and Tanzania, accounting for more than 86,000 individuals, have lost or will lose land as a result of the EACOP.^{xxvi} A further 4,865 households, accounting for 31,716 individuals, are directly affected by the Tilenga oil field.^{xxvii} The Kingfisher oil field will impact 680 households, or roughly 2,949 individuals.^{xxviii} In sum, the oil fields and pipeline are expected to directly impact the land of roughly 120,000 individuals. Already, before construction has begun, tens of thousands of oil-affected people in the Albertine region remain without access to significant portions of their land, unable to grow food for survival or income generation and prevented from burying their deceased, while awaiting compensation more than two years overdue.^{xxix}

These serious impacts on and risks to affected people and communities are occurring in an increasingly dangerous environment for human rights defenders. Community and civil society advocates that have publicly criticized, or even conducted research into the projects' impacts, have faced threats and attacks, including harassment and arbitrary detention as a result of their efforts to challenge oil development in Uganda.^{xxx} The free and open participation in decision making about the project and the avoidance and mitigation of its impacts by affected communities is impossible in this environment.

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The climate impacts of the oil projects are also evident: at peak production, the oil exported by the EACOP is anticipated to produce roughly 34 million metric tons of

additional carbon emissions per year.^{xxxv} This figure does not account for the full amount of oil that will be extracted; for example, the amount processed by the proposed refinery in Uganda has not been calculated. The estimate is significantly larger than the current combined emissions of Uganda and Tanzania.

This level of expected emissions is incompatible with the Paris Agreement, which all EPFIs have committed to upholding.^{xxxvi} It is also irreconcilable with findings published by the Intergovernmental Panel on Climate Change (IPCC) in April 2022, which warns that limiting warming to within 1.5 degrees Celsius requires halving all greenhouse gas emission by the 2030s, a target which can only be achieved by ambitious and immediate climate action.^{xxxvii} Similarly, warnings by the International Energy Agency (IEA) are unequivocal: exploitation and development of new oil and gas fields must stop if the world is to stay within safe limits of global warming and meet the goal of net zero emissions by 2050.^{xxxviii} The EACOP project jeopardizes the global community's chance of achieving this goal.

Assessment against IFC Performance Standards and Equator Principles

The serious ongoing impacts and future risks caused by the Tilenga, Kingfisher and EACOP projects have been extensively documented in numerous community-based impact assessments^{xxxv} and independent expert studies.^{xxxvi} This report draws upon that information to provide an overview of the oil projects' compliance with the Equator Principles, IFC Performance Standards on Environmental and Social Sustainability, as well as Ugandan national law (as required by Performance Standard 1). This report does not exhaustively address every risk and impact of the projects or assess compliance with all applicable standards.

Shortcomings of Project-Related Assessments and Consultation Processes

Applicable Standards:

- **IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts**
- **Equator Principle 2: Environmental and Social Impact Assessment**
- **Equator Principle 5: Stakeholder Engagement**
- **Equator Principle 6: Grievance Mechanism**

IFC Performance Standard 1 requires project sponsors to establish and maintain a process for identifying the environmental and social risks and impacts of the project, including through an environmental and social impact assessment.^{xxxvii} It also requires effective consultation with affected communities, "free of manipulation, interference, or coercion, and intimidation," and conducted on the basis of "the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information," presented in a culturally-appropriate language and format."^{xxxviii} Pursuant to Performance Standard 1, project sponsors are to provide affected communities with "access to relevant information on: (i) the purpose, nature and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on

such communities and relevant mitigation measures.”^{xxxix} For high impact projects, Performance Standard 1 requires that the consultation process “will result in the Affected Communities’ informed participation.” The required consultation process involves an “in-depth exchange of views and information, and an organized and iterative consultation, leading to the client’s incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues.”^{xi}

Similarly, Principle 2 of the Equator Principles requires EPFIs to ensure the client conducts an appropriate assessment process to address the relevant environmental and social risks and impacts of a proposed project. The assessment should adequately, accurately and objectively evaluate and present the project’s risks and impacts. Through this process, the client should “propose measures to minimize, mitigate, and where residual impacts remain, to compensate/offset/remedy for risks and impacts to Workers, Affected Communities, and the environment, in a manner relevant and appropriate to the nature and scale of the proposed Project.”^{xii} Pursuant to Principle 4, clients must prepare an Environmental and Social Management Plan (ESMP) to address issues raised in the assessment process and incorporate actions required to bring the client into compliance with applicable standards.^{xiii} The requirements of Principle 5 on stakeholder engagement echo those of IFC Performance Standard 1, requiring EPFI clients to conduct an effective Informed Consultation and Participation process, “free from external manipulation, interference, coercion and intimidation.”^{xiii}

These requirements do not appear to have been sufficiently met by the project sponsors. The project sponsors have systematically failed to adequately consult and disclose information in an accessible form to project-affected people and civil society. Oxfam’s community-based human rights impact assessment of the EACOP refers to a “generalized concern about the lack of information around issues that really matter to the communities,” including in regards to the destruction of graves, cemeteries and other sacred sites.^{xiv} While the project sponsors state that they have developed strategies to mitigate such risks, Oxfam confirms that, “based on information collected during community consultations, this information does not seem to have reached everyone or have been clearly understood.”^{xiv} Overall, local communities point to significant information gaps that persist despite the companies’ outreach efforts, and an environment of distrust among affected communities.

Although the Tilenga, Kingfisher and EACOP Environmental Impact Assessments, Human Rights Impact Assessments, and Resettlement Action Plans have been disclosed publicly, the element of accessibility and meaningful consultation is entirely lacking. For instance, on March 8, 2021, after significant pressure from local and international civil society, TotalEnergies published a range of assessments and reviews related to the Tilenga and EACOP projects.^{xvi} The documents were kept confidential for years following their completion and only disclosed after key project-related agreements had been signed. Draft versions of the reports and prompt disclosure of independent assessments were not provided for public comment, nor disclosed for the purposes of community consultation.

Transparency in line with the Performance Standards requires more than the publication of lengthy technical documents online. It requires, in addition, accessible explanations to affected communities of the risks and prevention or mitigation measures for the purpose of meaningful consultation. All reports from affected communities indicate that this has not occurred. Rather, consultations undertaken by the project sponsors have been ineffective and largely intended to legitimize the projects and attract international financing, rather than seek the informed input of affected communities.

The adequacy of the Tilenga and EACOP assessments are subject to multiple legal challenges, including the first lawsuit under the French Duty of Vigilance law for TotalEnergies' failure to identify and map the risk of human rights violations and environmental harm associated with its Tilenga operations, and to effectively implement preventative and mitigative measures.^{xlvii} In May 2019, a legal action was filed by Ugandan non-governmental organization African Institute for Energy Governance (AFIEGO) alongside youth leaders under the umbrella organization Guild Presidents' Forum on Governance (GPFOG). The suit was filed against Uganda's National Environment Management Authority (NEMA) and the Petroleum Authority of Uganda (PAU) seeking the cancellation of the Tilenga ESIA certificate of approval on the basis of alleged irregularities and illegalities witnessed prior to its issuance.^{xlviii} Notably, the ESIA for the Tilenga project's feeder pipeline^{xlix} was approved without public consultation, despite the feeder pipeline posing a major risk to Lake Albert, which serves as the biggest contributor to Uganda's fisheries (supplying 43%).^l Further, the Ugandan National Environment Management Authority (NEMA) decision to issue a certificate of approval for the EACOP ESIA report did not include a resettlement action plan at the time of its approval in December 2020.^{li}

The ESIA's for the Tilenga, Kingfisher and EACOP projects have also been heavily criticized as insufficient by independent experts, including the Netherlands Commission for Environmental Assessment (NCEA) and engineering firm E-Tech International, which found numerous gaps and shortcomings in the risk assessment and mitigation plans.^{lii} In response to the EACOP's initial ESIA non-technical summary and executive summary, NCEA notes, "Positive impacts seem to be presented (far too) rosy. The negative impacts are only mentioned in a very superficial and reassuring way (unspecified numbers of negative impacts only), without explaining why the reassurance is justified. The negative (cumulative) impacts have been downplayed." It concludes that the assessment is overall "not fit for purpose."^{liii} In its follow-up assessment of the revised and resubmitted ESIA, NCEA determined that these shortcomings were only partially or insufficiently addressed.^{liv}

Additional expert reviews of the Tilenga, Kingfisher and EACOP ESIA's have documented TotalEnergies' and CNOOC's failure to utilize industry "best available techniques" to avoid, mitigate and offset their environmental impacts. The expert reviews find that, in many respects, both companies have prioritized low production costs over the utilization of best available technique.^{lv} See section below on Performance Standard 6 for more detail on these shortcomings.

In addition to environmental and social impact assessments and mitigation plans, the Equator Principles require climate-specific assessments for EPFIs and their clients. Under Principle 2, a Climate Change Risk Assessment (CCRA) is required for all high-risk projects, and all projects where the combined Scope 1 and 2 emissions are expected to exceed 100,000 tons of CO₂ equivalent annually. In addition, for such projects, EPFI clients must conduct an “alternatives analysis” to evaluate all “technically and financially feasible and cost-effective options” available to reduce project-related emissions.^{lvi} While the project sponsors have published a full ESIA of EACOP which includes an alternatives analysis, the analysis fails to meet the criteria set out in the Equator Principles. Section 3 of the ESIA provides an alternatives analysis for the project which states that “other modes of crude oil transport were assessed,” alongside alternative routes and siting. The alternative analysis makes no reference to project options that reduce project-related greenhouse gas emissions in line with the requirements of the Equator Principles, and the ESIA neglects to even provide an analysis or calculation of the project’s expected greenhouse gas emissions. In addition, while section 6.6 of the EACOP ESIA refers to “global climate, including energy use, greenhouse gas emissions, carbon storage and sequestration, and local and global climate regulation,” it does not fulfill the criteria set out in the Equator Principles and implementation guidance to constitute a Climate Change Risk Assessment (CCRA).^{lvii}

IFC Performance Standard 1 and Equator Principle 6 also require clients to establish effective operational-level grievance mechanisms capable of receiving project-related complaints and facilitating resolution to affected communities’ concerns.^{lviii} Although the project sponsors have established an operational-level grievance mechanism for the EACOP, Tilenga and Kingfisher projects, affected communities state that the mechanism is not equipped to address their concerns. The mechanism that exists is not accessible, independent, or equipped to resolve the serious human rights abuses present. Community members report that those receiving the complaints are often the individuals perpetrating harm, including oil companies’ community liaison officers and project sub-contractors. They report a lack of accessibility, with individuals not being able to record complaints, and a lack of timeliness, transparency, and effectiveness, causing complainants to abandon the multi-level process. In these instances, where complainants give up or decide not to contest a resolution, the complaints are marked resolved in the project sponsors’ internal documents. Moreover, community members whose land is being acquired for the EACOP project have reported being intimidated when they lodge grievances.^{lix}

Finally, the project sponsors and Ugandan and Tanzanian governments have failed to disclose several major contracts and project-related documents for public scrutiny. In 2021, several binding contracts to progress the EACOP project were signed, including Host Government Agreements with Uganda and Tanzania, the Shareholders Agreement, and the Tariff and Transportation Agreement. None of these agreements have been made public.^{lx} This lack of transparency has been vocally criticized by Ugandan lawyers and civil society organizations and is now the subject of a legal challenge.^{lxi} Local civil society organizations contend that these failures are not in accordance with the Ugandan government’s commitments within the Extractive Industries Transparency Initiative (EITI).

Risks Associated with Improper Handling of Hazardous Waste and Oil Spills

Applicable Standards:

- IFC Performance Standard 3: Resource Efficiency and Pollution Prevention
- IFC Performance Standard 4: Community Health, Safety and Security

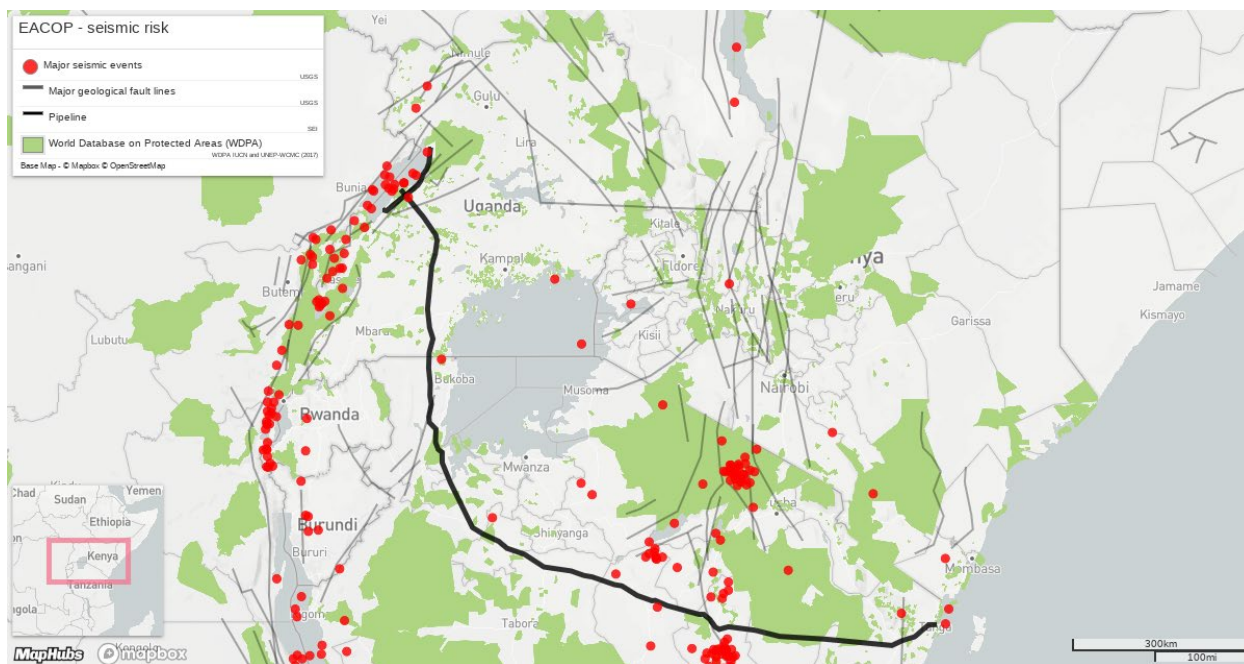
Performance Standard 3 requires project sponsors to avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. The standard calls for the application of resource efficiency and pollution prevention principles and techniques tailored to the hazards and risks associated with the nature of the project and consistent with good international industry practice.^{lxii} Performance Standard 4 requires companies to avoid or minimize the risks and impacts to community health, safety and security that may arise from project-related activities, including by addressing impacts on ecosystem services that may result in adverse health and safety risks to affected communities.^{lxiii} Performance Standard 4 reinforces the requirement of Performance Standard 1 to establish and publicly disclose all emergency preparedness and response plans in collaboration with affected communities, local governments and other relevant parties.^{lxiv}

Independent expert reviews of the Tilenga, Kingfisher and EACOP ESAs document the project sponsors' failure to apply "best available techniques" to prevent and mitigate degradation of ecosystem services at the project site, choosing to employ low-cost technology for oil drilling and water crossings.^{lxv} These failures create foreseeable risk to the health and safety of community members. See the section below on non-conformance with Performance Standard 6 for more detail on these shortcomings.

The prospect of an oil spill or leak from the EACOP poses a significant risk to water resources in the region. The pipeline route traverses numerous bodies of water relied upon by local communities, and puts at risk the groundwater that local communities use to meet their daily needs.^{lxvi} About one-third of the pipeline (460km) will run along the western and southern perimeter of Lake Victoria, Africa's largest lake, which directly supports the livelihoods of more than 40 million people in the region.^{lxvii} The risk of oil spills or leaks is compounded by the fact that the pipeline will traverse an area of particularly high seismic activity, the Rift Valley.^{lxviii} A technical review of the pipeline ESIA confirmed, "EACOP oil spills will occur over the lifetime of the project."^{lxix} Despite this, the EACOP ESIA does not contain a robust oil spill emergency response plan, including measures to support communities whose drinking water would be contaminated in the case of a spill. TotalEnergies has stated that the oil spill response plans will be "finalized prior to commissioning of the pipeline when hydrocarbons are introduced into the system." However, the companies should make these plans public

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and consult stakeholders well before the pipeline is given a green light.^{lxx} This failure creates foreseeable risk to the health and safety of community members and demonstrates clear non-conformance with Performance Standards 3 and 4.^{lxxi}



Where hazardous waste generation cannot be avoided, Performance Standard 3 requires project sponsors to “reduce the generation of waste and recover and reuse waste in a manner that is safe for human health and the environment. Where waste cannot be recovered or reused, the client will treat, destroy or dispose of it in an environmentally sound manner [...] when hazardous waste disposal is conducted by third parties, the client will use contractors that are reputable and legitimate enterprises licensed by the relevant government regulatory agencies,” or consider alternative disposal options.^{lxxii}

Safeguards to this effect have not been effectively established at both the Tilenga and Kingfisher oil field projects, where independent experts found that both projects are resorting to low-cost options for hazardous waste disposal, including through the outsourcing of waste disposal to inexperienced local sub-contractors.^{lxxiii} TotalEnergies has defended its decision to outsource waste disposal to local contractors despite the fact that, “there is no history in Uganda of successful operation of hazardous waste landfills at a standard necessary to process drilling wastes from the Tilenga Project,” as noted in the project’s ESIA technical review.^{lxxiv}

Moreover, recent studies conducted in 2021 by Makerere University researcher, Abraham Mwesigye, found that poor oil waste disposal and management in the Albertine Graben has already led to the contamination of soil and two water bodies, impacting agricultural livelihoods.^{lxxv}

Retaliation Against Human Rights Defenders

Applicable Standards:

- IFC Performance Standard 4: Community Health, Safety and Security

IFC Performance Standard 4 also requires appropriate identification and mitigation of safety risks.^{lxxvi} This standard is not being met with regard to the risks facing community members that express criticism of the project, community members who report grievances in the land acquisition process, and human rights defenders seeking to challenge the project through litigation and non-legal means.^{lxxvii} Community members, human rights defenders, environmental defenders and journalists critical of the oil projects have experienced harassment, intimidation, security threats, and retaliation, including arbitrary arrest and detention.^{lxxviii} Community members have expressed fear of retaliation that prevents them from speaking freely and openly about the projects and engaging meaningfully in consultation with the project sponsors, and that has led to the coercion of landowners during the land valuation and acquisition processes.^{lxxix}

Despite claiming to engage in consultation with affected communities, the project sponsors have failed to effectively address these risks. The risks facing human rights defenders in relation to the oil projects have prompted the scrutiny of several United Nations Special Procedures, including Special Rapporteurs, who in 2020 wrote letters to TotalEnergies and to the French and Ugandan governments.^{lxxx} Special Rapporteurs again raised concern in July 2021, after a human rights defender and journalist were arbitrarily arrested and detained without charge while conducting interviews with oil-affected communities in Uganda's Buliisa district,^{lxxxi} and a third time in January 2022 after several human rights defenders and community leaders working on oil and gas issues were intimidated and arrested.^{lxxxii}

In October 2021, several instances of judicial harassment, including arrests, occurred.^{lxxxiii} This included the arrest of six members of the organization Africa Institute for Energy Governance (AFIEGO), including its director; a representative of project-affected peoples, Mr. Robert Birimuye; and the chair of the community-based Oil and Gas Human Rights Defenders Association (ORGHA), Mr. Joss Kaheero Mugisa, who spent 54 nights in jail and is still awaiting trial.^{lxxxiv} Police closed the local offices of AFIEGO and several other nongovernmental organizations (NGOs) in the region. These actions and arrests are part of a pattern of harassment and persecution by the Ugandan authorities. They follow a move by Uganda's NGO Bureau in August 2021 through which the bureau ordered 54 NGOs to halt operations.^{lxxxv} The order affects many organizations working on accountability and transparency in the oil sector. The move has been condemned by, among others, the International Commission of Jurists, which described it as an "assault on the critical work of civil society," and three UN Special Rapporteurs, who have written to Uganda expressing concern and calling for an explanation.^{lxxxvi}

Improper Land Valuation, Acquisition and Compensation Processes and Significant Land Use Restrictions

Applicable Standards:

- IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement

Recognizing that involuntary resettlement and displacement, including both physical and economic displacement, can cause long-term hardship and impoverishment, IFC Performance Standard 5 requires projects to avoid resettlement whenever possible and to minimize resettlement and mitigate adverse impacts whenever it is unavoidable.^{lxxxvii} According to TotalEnergies, the Tilenga and EACOP projects will require the acquisition of 6,400 hectares of land, upon which the primary residences of 723 households are located.^{lxxxviii} This number significantly downplays the scale of land loss resulting from the interrelated oil projects, including the economic displacement of farming communities. In sum, the oil fields and pipeline are expected to directly impact the land of roughly 120,000 individuals.^{lxxxix}

Performance Standard 5 calls upon IFC clients to anticipate, avoid and/or minimize adverse social and economic impacts resulting from land acquisition or restrictions on land use by, inter alia, (i) providing replacements or replacement cost compensation for loss of assets, and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation and the informed participation of affected communities.^{xc} By contrast, the land valuation, acquisition, and compensation processes for the EACOP and associated oil field projects have been carried out in a way that has exacerbated, rather than mitigated, negative impacts. As a result, community members have faced and are currently facing increased impoverishment, livelihood disruption, economic hardship, food insecurity, and other cumulative impacts.

A December 2020 impact assessment by Les Amis de la Terre France and Survie documents how the mishandled resettlement processes for Tilenga and EACOP have led to the infringement of numerous rights including those to property; to an adequate standard of living; to food; to education; to health; to adequate housing; to life, liberty and security; to freedom of expression, association and peaceful assembly; and to free, prior and informed consent.^{xc1}

Despite the preparation and publication of lengthy Resettlement Action Plans, TotalEnergies and CNOOC have not demonstrated that their land acquisition, resettlement and livelihood restoration programs are consistent with IFC standards.

The land valuation, acquisition, and compensation processes for the EACOP and associated oil field projects have been carried out in a way that has exacerbated, rather than mitigated, negative impacts . . . community members have faced and are currently facing increased impoverishment, livelihood disruption, economic hardship, food insecurity.

Overall, in the development of the Resettlement Action Plans, the companies have failed to allow for meaningful consultation and community participation on draft plans and have not disclosed in an appropriate and accessible form plans for the resettlement and livelihood restoration programs. Significant confusion, anxiety and fear surrounding the land acquisition and relocation processes for Tilenga and EACOP persist throughout affected communities, who remain largely uninformed of project timelines, location of replacement land, and plans for livelihood restoration programs. These processes are in grave breach of the objectives and requirements of Performance Standard 5.

Land use restrictions, cut off dates and delayed compensation

In the Tilenga concession area, affected communities whose land has been earmarked for acquisition have faced years-long delays in compensation and relocation, while suffering from restricted access to their land.^{xcii} As of May 2021, only about one-fifth of Tilenga-affected people had received compensation, after more than two years of land use restrictions following the valuation of property and establishment of cut-off dates.^{xciii} Similar hardships are resulting from the land demarcation without compensation that is being carried out in relation to EACOP, as detailed below. Community members report either being partially or totally deprived from accessing their land to grow crops, repair their houses, and bury their dead, while awaiting compensation. In some instances, communities have been permitted to grow seasonal crops, which are not sufficient for income generation or survival.^{xciv}

Beginning in 2017, TotalEnergies began establishing cut-off dates for the use of land by project-affected peoples impacted by the company's first Resettlement Action Plan (RAP1) for the Tilenga oil field. At that time, communities were told that they must stop using the land. Due to delays in the project's implementation phase, the communities have been stuck in a state of "limbo," having received no compensation for the land they are not permitted to use. In the years since, the same issue has impacted project-affected peoples under Tilenga project's four subsequent Resettlement Action Plans.^{xcv}

Although TotalEnergies has claimed in some forums that the cut-off dates were not intended to restrict use of land, the company has made contradictory claims in other instances. For instance, in response to inquiries by Oxfam, TotalEnergies explained that after cut-off dates, community members "should not add or improve anything to the land, and planting of new perennial crops is considered an improvement."^{xcvi} Such contradictory claims demonstrate TotalEnergies' failure to ensure project-affected people have access to complete, timely, and easily understandable information.

Further, despite the company's contradictory statements regarding land access, community members assert that TotalEnergies employees and those of its contractors have actively prevented communities from accessing their land and have retaliated, sometimes violently, against landowners that have sought to use their land for agricultural or other purposes after the establishment of cut-off dates. These instances, which are still ongoing, are systematically documented in the impact assessments by international NGOs and in at least one academic assessment.^{xcvii} According to FIDH, the "companies [have] set cut-off dates without a clear timeline in which effective

compensation will take place.” Where project-affected peoples are permitted to grow seasonal crops, the company has made clear that should the project move forward, along with attendant need to seize the land, project-affected peoples will not be compensated for any crops planted after the cut-off dates. Because the project’s timeline has faced continual delays, and the companies have failed to meaningfully inform and update community members of the timeline for land acquisition, landowners have been left in a state of speculation and anxiety, fearful that seasonal crops they plant could be destroyed at any moment and they would be prevented from recovering their short-term investments. This anxiety is compounded by the fact that many community members whose agricultural livelihoods have been impacted are facing extreme financial hardship.^{xcviii}

These issues are also present along the EACOP route.^{xcix} Although construction of the pipeline has not yet commenced, the route planning and land demarcation process has already caused adverse impacts to local communities through the establishment of cut-off dates for compensation in mid-2019.^c To date, those whose land underwent valuation and demarcation have suffered restricted access to land and have not received compensation. An assessment in the Energy Research and Social Science academic journal concluded with reference to IFC Performance Standard 5 that, “[I]t is very evident that the EACOP project has failed in relation to its obligations to minimize the time between cut-off date and compensation/resettlement.”^{ci}

According to a report based on interviews with EACOP-affected communities, populations along the pipeline route have been prevented from growing perennial food and cash crops or making any improvements to their properties, similarly to those affected by the Tilenga oil field. This has led to economic displacement for households who rely upon agricultural livelihoods.^{cii} Community members report frustration resulting from restricted land use access, including being unable to bury family members on their property, and being prevented from refurbishing their properties including, in some cases, fixing facilities relied upon by families, like kitchens.^{ciii}

The effects of land loss and restricted access to farmland in a region where the majority of people depend upon the subsistence economy cannot be overstated. The loss of agricultural land and delayed compensation have had a crippling effect on tens of thousands of individuals in the region, creating food insecurity, driving families further into poverty and resulting in cumulative adverse impacts such as sharp increases in school dropout rates. Many of these impacts disproportionately harm the rights of women and girls.^{civ}

The years-long restriction of communities’ access to land through the establishment of cut-off dates demonstrates a violation of Performance Standard 5 requirements. This issue is addressed in the IFC Performance Standard 5 guidance note, which states:

“Establishment of restrictions on activities such as construction, agricultural activities, and home improvements after the establishment of cut-off dates can represent a moderate to severe hardship for affected households and communities. Often there are delays between the cut-off date (and the subsequent establishment of restrictions) and the

development of the project, including compensation for losses and resettlement of affected households and communities. The time between the establishment of the cut-off date and compensation of displaced individuals and communities should be limited. Losses generated by this restriction of land use should be compensated for by the client. The client should also consider ways to minimize impacts from cut-off restrictions such as planning development activities, so that affected farmers can harvest crops prior to displacement. Also a firm timetable should be adhered to or the client must be prepared to pay compensation for the delay. For example, when communities do not plant crops in anticipation of a move, which is then delayed, the community may need assistance in meeting their food needs because they did not have a harvest that year.”^{cv}

A gap of over two years between the establishment of cut-off dates and provision of compensation is clearly not in line with this standard. Further, the project sponsors have failed to adhere to a firm timetable for the land acquisition and compensation process, leaving communities in continuous fear of abrupt eviction. TotalEnergies stated publicly at its Annual General Meeting that compensation will now include a 30 percent uplift^{cvi} to account for the delays experienced by communities.^{cvi} However, this is insufficient to bring the compensation process back in line with Performance Standard 5 because it does not account for the initial insufficient valuations and compensation rates (detailed below); it does not account for the full revenue loss and the increase in land values since the initial valuations; and does not effectively compensate for the cumulative negative impacts experienced by communities as a result of the delays and restricted land use, such as food insecurity and malnutrition, inability to access health services due to economic hardship, increased school dropouts, moral trauma, and more.

Additional issues related to valuation and compensation

Local communities allege additional shortcomings in the land acquisition process for the EACOP and Tilenga projects. They allege that the assessment and valuation of land and crops are incomplete or inaccurate; that compensation rates are insufficient; that they have not been able to freely choose between monetary compensation and compensation in-kind; and that they have no knowledge of or choice in where they are to be resettled.^{cvi}

Communities report inaccuracies in the cadastral surveys and valuation processes carried out in relation to both Tilenga and EACOP. In several instances, valuation forms were signed under duress, or valuation was carried out while property owners were not present. Community members report facing pressure from TotalEnergies and its subcontractors to sign valuation forms, including incomplete forms.^{cix} In relation to EACOP, local communities claim that, in contravention of Uganda’s 1998 Land Act, project-affected people were never consulted on the compensation rates used for crops and buildings of a non-permanent nature, resulting in inadequate rates and under-valuation of property in several districts.^{cx} Project-affected people who have sought to challenge insufficient asset valuations have reported ongoing harassment

and intimidation from security agents and individuals associated with the EACOP and Tilenga projects, including the Resident District Commissioners and District Police Commanders.^{cxix}

In accordance with Performance Standard 5, economically displaced people whose livelihoods are land-based should be offered alternative land of equal size and quality, alongside the option of replacement cost cash compensation.^{cxii} Compensation (in-kind or cash) should be provided prior to any acquisition or land use restrictions. Despite public statements by the project sponsors that communities are offered the option of monetary or in-kind compensation, communities claim that the companies and their subcontractors have employed tactics of intimidation and manipulation of affected landowners that compel them to accept monetary compensation rather than compensation in-kind.^{cxiii}

Those who have received monetary compensation report inadequate and outdated compensation rates that do not meet replacement cost, effectively leaving families without an economic base to earn a living and grow food.^{cxiv} Those who have requested or intend to request replacement land fear being relocated to land that is of lesser value and fertility, and where agricultural productivity is low. The project documentation validates this concern, stating:

“There is increasing scarcity of land and replacement land for economically displaced individuals may not be as productive as previous land holdings. The impacts will be very long-term and will affect some households within the PACs. Due to their large magnitude and very high sensitivity, before mitigation the impacts are considered significant.”^{cxv}

The majority of affected communities have not yet been informed of the location of replacement land and remain skeptical that the project sponsors can adequately mitigate the impacts of economic displacement.

Impacts and Risk of Irremediable Harm to Protected Areas and Natural Resources

Applicable Standards:

- **IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Performance Standard 6 recognizes that protecting and conserving biodiversity, maintaining ecosystem services, and sustainably managing natural resources are fundamental to promoting sustainable development.^{cxvi} The standard applies to critical habitats, which are areas with high biodiversity value, including those of significant importance to endangered species.^{cxvii} The Equator Principles preamble similarly commits EPFIs to supporting conservation efforts when making decisions related to biodiversity.^{cxviii}

The oil projects pose immense environmental risks and impacts, including both direct impacts to biodiversity resulting from the project placement and design, as well as

indirect risks posed by the threat of oil spills in protected and sensitive areas.^{cxi} The design and location of the Tilenga, Kingfisher and EACOP projects mean that they will have extensive and irreversible adverse impacts upon critical habitats and protected ecosystems. The projects entail drilling over 130 oil wells (corresponding to 10 well pads) into Uganda's largest national park and constructing the world's longest heated crude oil pipeline through numerous protected ecosystems critical to the preservation of endangered species. In the opinion of experts and local communities, the significant biodiversity risks are so inherent to the project designs that they are impossible to adequately mitigate.

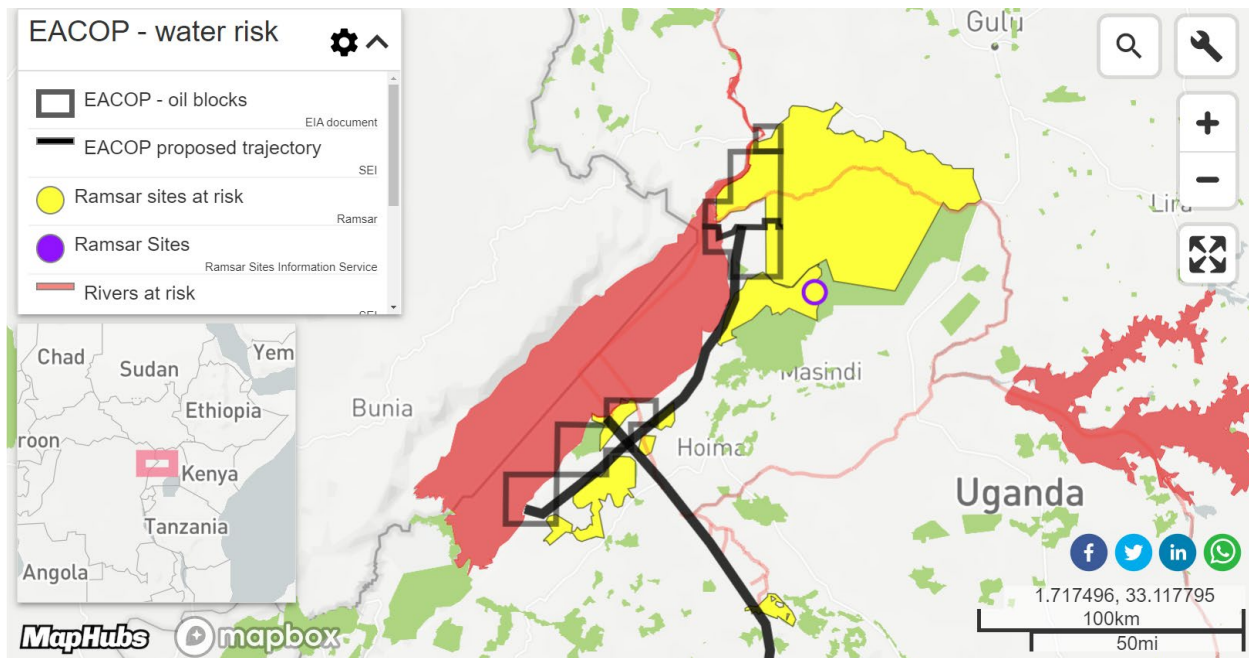
Tilenga and Kingfisher environmental risks and inadequate mitigation measures

The Tilenga and Kingfisher oil fields are located in the Albertine Graben, one of the richest natural habitats in the world. According to the Sensitivity Atlas for the Albertine Graben that was produced by Uganda's National Environment Management Authority, "species biodiversity of the Albertine rift is unparalleled on the African continent."^{cxx}

While TotalEnergies and CNOOC have committed to apply the IFC Performance Standards and utilize industry "best available techniques" to avoid, mitigate and offset their environmental impacts, expert assessments have found that this is not, in fact, the case. In many respects, both companies have prioritized low production costs over the utilization of best available technique in project design.^{cxxi}

According to an external review of the Tilenga ESIA, TotalEnergies' plans to develop ten well pads within Murchison Falls National Park does not represent "best available technique" and will result in irremediable impacts on wildlife within the park.^{cxxii} Since 2019, the technical expert has recommended that TotalEnergies employ an alternative drilling technique which would allow it to reduce the number of well pads within the National Park to one, and lead to significantly less disturbance of the surrounding area.^{cxxiii} Nonetheless, TotalEnergies has opted for the lower-cost option of horizontal drilling, and has maintained its plan to develop ten well pads located within the park, corresponding to over 130 wells.^{cxxiv} TotalEnergies has cited "operational constraints" as justification for this decision. The expert review confirms that TotalEnergies "has chosen a least-cost, high impact development model for the Tilenga Project in the face of the profitability risks associated with the venture," and "is not applying BAT" [Best Available Technique].^{cxxv} Similarly, TotalEnergies' decision to outsource responsibility for hazardous waste management to sub-contractors with insufficient technical expertise and capacity represents another failure to utilize best available technique in favor of low-cost options.^{cxxvi}

Since 2019, the technical expert has recommended that TotalEnergies employ an alternative drilling technique . . . Nonetheless, TotalEnergies has opted for the lower-cost option.



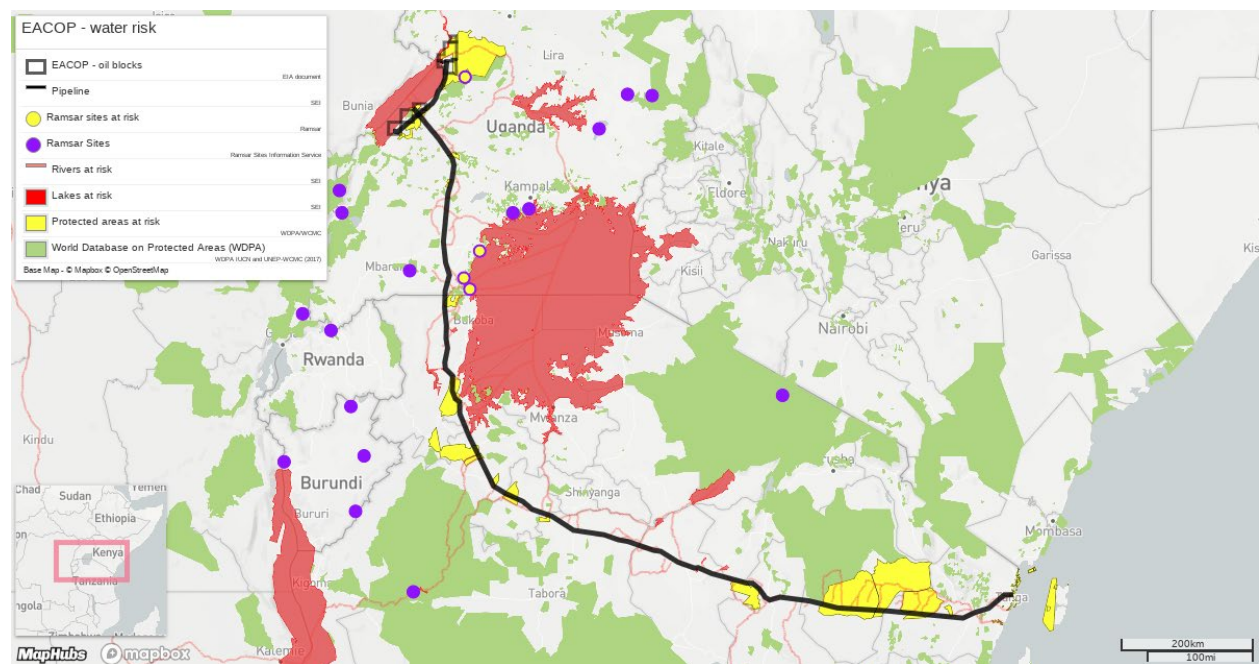
CNOOC has also failed to employ best available technique in the project design of its Kingfisher project by deciding to locate its central processing facility and well pads on the shores of Lake Albert, directly within the sensitive area of Buhuka Flats.^{cxxvii} An expert review of Kingfisher ESIA finds similar failures to use best available technique with respect to disposal of drilling waste, handling of water, the mitigation of noise and visual impacts, and a variety of other aspects of project design and management. The expert review recommends changes to project design that would enable CNOOC to prevent a range of environmental and social impacts, but the company has not adopted the recommendations.^{cxxviii}

EACOP environmental risks and inadequate mitigation measures

There are at least 13 species “of conservation importance” within the EACOP’s area of influence, including at least 10 plants of conservation importance at risk.^{cxxix} Six of these are on the IUCN Red List of Threatened Species.^{cxl} In total, nearly 2,000 square kilometers of protected wildlife habitats, including 500 square kilometers of wildlife corridors for the Eastern Chimpanzee and African Elephant—species considered endangered by IUCN, and which have already disappeared in several African countries—are expected to be severely degraded by the construction of the pipeline.^{cxli} In Tanzania alone, the pipeline corridor will traverse seven forest reserves, two game reserves, two game-controlled areas and one open area that supports wildlife management. The pipeline will impact at least four forest reserves in Uganda, as well as several sacred natural sites, and will cross 32 kilometers of the Wembere Steppe in Tanzania, a Key Biodiversity Area.^{cxlii} At the port in Tanga, Tanzania, where the oil will be transferred offshore, two Ecologically or Biologically Significant Marine Areas (EBSAs), the Pemba-Shimoni-Kisite site and the Tanga Coelacanth site, are at high risk

of degradation. These two EBSAs host numerous Marine Protected Areas, Mangrove Forest Reserves, ecologically significant coral reefs, and other wildlife.^{cxxxiii}

EACOP poses a significant risk to water resources in the region, including several Ramsar Wetlands of International Importance.^{cxxxiv} The risk of an oil spill impacting Lake Victoria alone threatens the health and livelihoods of over 40 million people that rely upon the lake as a primary source of freshwater.^{cxxxv} Despite these risks, expert technical reviews of the EACOP ESIA state that Total and CNOOC have opted for the lowest-cost option for almost all water crossings, rather than employing best available technique. The reviews state that the risk of damage to water sources “seems to be ignored” in the project’s ESIA, which “does not make clear that the proposed technology [for water crossing] is acceptable and for what reasons.” The reviewers state that “the issue is strongly underrated, and specific plans and alternatives should be presented.”^{cxxxvi}



Risks to ecosystem services that support livelihoods

Performance Standard 6 recognizes the benefits that ecosystem services provide to people, including businesses. To this end, a core objective of Performance Standard 6 is to maintain the benefits of ecosystem services and promote the sustainable management of natural resources through the adoption of practices that integrate conservation needs and development priorities.^{cxxxvii}

In addition to those whose livelihoods have been or will be adversely impacted by the projects due to the acquisition of farmland or degradation of fishing resources, local business owners in the tourism industry fear that their livelihoods will be adversely impacted by the oil sub-projects. TotalEnergies’ decision to drill oil within Murchison Falls National Park has been called into question by experts who claim that tourism could provide a greater source of economic development to the country than oil, while

also serving a conservationist role within the area. By contrast, experts theorize that the oil project will irreversibly damage the national park's environment while simultaneously negatively impacting the growth of the tourism industry.^{cxxxviii} Although commercial extraction has not yet occurred, preliminary activities for the Tilenga project within Murchison Falls National Park has already had an enormous impact on biodiversity within the park.

Moreover, as indicated earlier in this report, indigenous communities working in the fisheries sector have already been negatively affected by oil exploration as they could no longer access fishing grounds at Lake Albert. Impacts to the fisheries sector is expected to worsen as rivers, lakes, wetlands and various water resources across Uganda are affected by the Tilenga, Kingfisher and EACOP oil projects. These risks and impacts have transboundary reach to the Democratic Republic of Congo.



Photo credit: Amis de La Terre / Lambert Coleman

Furthermore, the destruction of the few remaining high tropical rainforests such as Bugoma in the Albertine Graben has been linked to oil exploitation efforts in the area. Since oil exploitation efforts commenced, instances of land grabbing have increased, including the seizure of Bugoma forest land for the benefit of the sugar industry.^{cxxxix} District leaders, local communities and civil society attribute the land grabbing and subsequent destruction of Bugoma forest to the land pressures created by oil activities in the region. Moreover, biodiverse forests such as Budongo^{cxli} and Wambabya^{cxlii} are

also at risk of degradation from the oil projects' road infrastructure and from the EACOP itself.

The fear associated with the oil project's negative impact on the tourism, agriculture, fisheries, clean energy and other industries that are the biggest employers of Ugandans, has prompted the formation of Inclusive Green Economy Network of East Africa (IGEN-EA), a cross-sectoral alliance of Ugandan environmentalists, civil society, youth groups, and business owners including farmers, tourism industry leaders and more. The platform seeks to challenge the narrative that the oil sector offers the country important economic and developmental benefits, and advocates for a cleaner, more inclusive, and more sustainable economic future and development path that does not contribute to climate change.^{cxliii}

Conclusion

It is apparent that the East African Crude Oil Pipeline project and its associated facilities, the Tilenga and Kingfisher oil fields, fail to comply with the Equator Principles and IFC Performance Standards in a variety of ways. These include, *inter alia*, major shortcomings in the project's consultation processes, impact assessments and risk management plans; severe and unmitigated risks associated with the improper handling of hazardous waste and oil spills contaminating critical water supplies; the continuing threats and unlawful retaliation against human rights defenders, environmentalists and community leaders that express concern with or disapproval of the project; the ongoing and anticipated impacts related to land valuation, acquisition and compensation processes; and the ongoing and anticipated impacts of irremediable harm to protected areas and natural resources, including to critical ecosystem services that support the lives and livelihoods of local communities.

This report details several ways in which the project sponsors have failed to abide by international and industry standards in the project's design and implementation, including by neglecting to employ the 'Best Available Technique' in favor of high-risk and low-cost project designs and the failure to carry out land valuation and acquisition processes in line with the IFC Performance Standards. The project sponsors' stakeholder engagement has been severely lacking, in clear violation of Performance Standard 1, and has not enabled the informed participation of affected people leading to 'broad community support' for the project. Severe environmental and social risks are inherent to the project, such that they are impossible to adequately mitigate, and the project is thus fundamentally incompatible with the aim and spirit of the Performance Standards and Equator Principles.

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^{vi} [News24](#), "Activists call out Standard Bank for mulling over East Africa Crude Oil Pipeline," Feb 2022.

^{vii} [Equator Principles](#), Principle 3.

^{viii} [Equator Principles](#), Designated Countries.

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- ^{xviii} [StopEACOP](#), [Banks Checklist](#) and [Insurer Checklist](#), 2021.
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