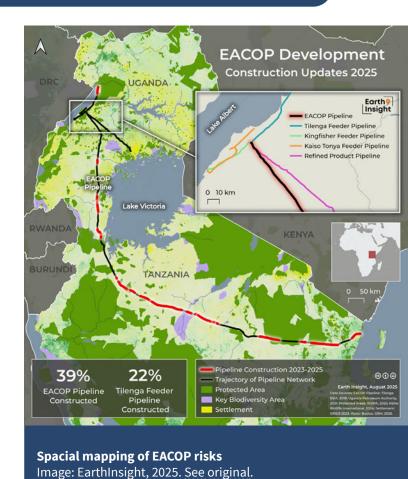
# Over budget, delayed and dangerous: The East African Crude Oil Pipeline limps on

The East African Crude Oil Pipeline (EACOP), which is under construction between Hoima in Uganda and the port of Tanga in Tanzania, announced in July 2025 a "final 12-month sprint" towards completion. However, this belies a reality in which the project is billions over budget, years delayed, and mired in scandal. Furthermore, it has still not reached financial close, and faces a significant funding shortfall that has obliged the project partners to pour more of their own capital into the project. Having already increased their equity shares in the project to prevent the construction from stalling, the project partners now appear poised to provide debt financing as well, in the form of shareholder loans, to keep the project afloat.

A total of 43 banks have ruled out financing for the 1,443 km pipeline, through announcements or policies. In addition, in April 2025, Chubb became the 30th (re)insurer to reject EACOP. The project sponsors – TotalEnergies (hereinafter "Total") (62%), CNOOC (8%) and the Ugandan and Tanzanian national oil companies (15% each) – are now reportedly seeking Chinese and Middle-Eastern financiers to provide the rest of the external financing for EACOP, amid growing project costs. This difficulty in finding external finance has also led the project sponsors to take on a greater share of the project's costs – and risks – than planned.

During this critical period, the project poses growing risks, including reputational risks, stranded assets risks and decreasing crude oil demand. Those facing these risks include banks underwriting bonds or providing general-purpose loans to Total or CNOOC and those with equity investments in these companies, as well as current and potential direct financiers of the pipeline.



Meanwhile, many of the resettlement issues set out in our previous risk updates still persist, with the Ugandan government increasingly opting for court-sanctioned evictions. Harassment of communities and project opponents have increased, with peaceful protests being criminalised. And the project is actively damaging nature and biodiversity as pipelines are being laid.

This briefing note sets out significant developments of interest to banks, investors and insurers that may be exposed to the project or its sponsors, or that may still be considering financing the EACOP, that have emerged since our most recent Risk Update in February 2024.

### 1. Project updates

#### **Construction in progress**

Construction of the 1,443 km EACOP pipeline began in 2024. To date, 1000km of line pipes have arrived in Uganda from China and Greece, and pipe installation was expected in August 2025. Although EACOP Ltd reports that the project is at 62% completion as of June 2025, recent satellite analysis from EarthInsight shows that as of September 2025 only about 39% of the EACOP pipeline has been cleared or constructed. The company currently estimates first oil in June 2026, a one-year postponement from the previous June 2025 target. Some observers doubt this target will be hit.

### DRC still seeking access to the EACOP, leading to more risks

The EACOP was originally planned to export oil only from Uganda's Tilenga and Kingfisher oil fields. However, the Democratic Republic of the Congo (DRC) has also expressed interest in accessing the pipeline, and has taken steps towards a Memorandum of Understanding (MoU) with Uganda on the matter. A new oil auction process in DRC was announced in mid-2025, after a previous auction was cancelled in late 2024.

Although Total executives denied in 2023 that EACOP would be able to accommodate Congolese oil, estimates that the pipeline will operate at under half of its potential capacity for most of its 25-year lifespan suggest otherwise. The DRC's strong intention to gain access to the EACOP significantly increases the project's risks to climate, communities and nature as it facilitates additional oil extraction, including in highly environmentally sensitive areas. Congolese oil sector development, and its link to EACOP, has become the subject of international campaigning efforts.

### 2. Finance updates

#### Financial close pushed back again

The overall project cost of the EACOP was originally estimated at \$3.5 billion, but has been repeatedly revised upwards, and is now estimated at \$5.6 billion as of July 2025. The project has still not reached financial close – originally slated for 2019, but repeatedly delayed – after the most recent June 2024 target for closing the then-planned \$3.0 billion project loan was missed.

After years of delay, the project finally secured what it described as a "first tranche" of debt financing in March 2025. According to company reporting, the loan is for \$755 million, and was provided by a syndicate of Afreximbank, Standard Bank, Stanbic Bank Uganda, KCB Bank Uganda and the Islamic Corporation for the Development of the Private Sector (ICD). The amount raised is far less than the \$3.0 billion in debt that was initially sought for the project. Two more tranches are reportedly expected, although no detail or timeline has been disclosed for these.

### **Total & CNOOC forced to fill financing gap**

Funding difficulties have led the project companies to revise their financing plans and commit to funding a shocking proportion of the project costs themselves. After initially planning for a 60:40 debt to equity ratio, recent reports indicate a 48:52 ratio is now planned, after the initial equity was depleted. The developers have already disbursed additional equity to make up the debt shortfall, having to date spent roughly \$2.8 billion out of their own pockets to prevent the project from stalling.<sup>2</sup>

The new 48:52 equity to debt ratio would imply that the project requires \$2.7 billion in debt (48% of \$5.6 billion) to be completed. With only \$755 million committed from external sources, this leaves the project still facing a finance gap of close to \$2 billion on the debt side. According to an EACOP Ltd corporate disclosure, "additional Facilities" have been

EACOP Ltd, 2024 Annual Report, p25, 27-8

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E.g. see Climate Accountability Institute, 2022; Figure 8

signed "with parent companies [in the share-holders' group] to fund the remaining portion of the Construction Budget." This suggests that TotalEnergies and CNOOC themselves have committed to providing loans to their own project, in the face of large-scale rejection by the global banking sector.

"TotalEnergies and CNOOC themselves have committed to providing loans to their own project, in the face of large-scale rejection by the global banking sector."

If true, this would be a shocking and unusual example of shareholders in a joint-venture partnership providing both significant equity and debt financing, constituting roughly 86% of the total project cost—more than triple the amount that they initially planned to pay for. This means Total, CNOOC and the governments of Uganda and Tanzania are assuming a greater proportion of the risk for the controversial project. It also means that Total and CNOOC's general corporate financiers—including their bond underwriters and holders—are significantly more exposed to the project, by providing critical sources of funding for the project.

### More major financial institutions distance themselves from EACOP

Since our last update, seven more European banks confirmed they would not be financing the project. This means over 40 global banks have ruled out financing the project, including most of Total's largest financiers.

In addition, Germany's Union Investment made the decision to divest from Total in its sustainability funds due to allegations of abuses concerning the EACOP project and Mozambique LNG. (It remains invested through its conventional funds.) Further, Nordea, one of the largest Nordic banks, has also shared that they are not purchasing any new Total shares or bonds because of the EACOP and its risks.

# Top financiers still underwriting Total bonds, growing their exposure to EACOP

Although the majority of Total's top bankers have indicated that they will not be directly financing the EACOP, several banks including Citi, BBVA, Deutsche Bank, JPMorgan Chase, MUFG, Royal Bank of Canada, Société Générale, and Wells Fargo underwrote bonds for TotalEnergies in March and June 2025. These transactions mean that these banks, and others underwriting bonds for Total or CNOOC, are still facilitating finance for Total which can be used for the EACOP. This is particularly true in light of Total's recent commitment to provide loans to the project. It is highly likely that the company will fund those disbursements through the ongoing issuing of bonds and other debt securities.

Ibid., p4, p35

### **Searching for finance from Europe to China** and the Middle East

From 2023, it was reported that EACOP was looking to Chinese banks as a last resort for funding. Two years later, this financing has yet to be confirmed. In August 2024, the Ugandan Minister of Energy and Mineral Development, Ruth Nankabirwa, was reported as saying nine European banks had agreed to finance EACOP and that this was the condition to secure Chinese financing. Financing from European banks has also not emerged.

In September 2024, civil society organisations wrote to the China Export & Credit Insurance Corporation (Sinosure), reiterating their concerns and making the case that the finance of EACOP is a violation of China's Green Finance Guidelines. The guidelines require banks to ensure their financing does not contribute to environmental harm or social injustice.

In early 2025 it was <u>reported</u> that the Uganda National Oil Company (UNOC) was seeking financing from Oman for the project. Civil society groups have <u>warned</u> that finance for the EACOP would also contravene principles of Islamic finance.

### **Key risks for EACOP/Total financiers**

- Chinese and Middle Eastern project financing of the EACOP is likely to violate local financing guidelines, such as China's Green Finance Guidelines and Islamic finance principles.
- The project is in violation of the Equator Principles and the International Finance Corporation's Performance Standards. This affects signatories of the Equator Principles, including Standard Bank as lender.
- Total and CNOOC bond underwriters and bondholders are now significantly more exposed to the EACOP project, as Total and CNOOC put forward additional equity and debt financing for the project, sourced from their own working capital. Any additional bond issuances by the company should be assumed to be critical sources of financing for EACOP.
- Major financial institutions, including banks such as Citi, BBVA, Deutsche Bank, JPMorgan Chase, MUFG, Royal Bank of Canada, Société Générale, and Wells Fargo, that have distanced themselves from financing the EACOP, have nonetheless underwritten bonds issued by Total, facilitating finance that can be used for the EACOP.

### 3. Human rights impact updates

### **EACOP** protesters in Uganda routinely arrested

Protesting against the EACOP appears to have been effectively criminalised in Uganda, with peaceful protesters being routinely arrested, detained and often mistreated. Between May 2021 and August 2025, 222 people who were protesting against or critical of the EACOP were arrested.

Financial institutions have been involved in incidents leading to the arrest of some of the above people. For instance, In April 2025, 11 protesters were lured to the basement of the KCB Bank building in Kampala and arrested while attempting to deliver a letter demanding the bank withdraw financial support to EACOP. They were only released on bail 85 days after their arrest.

This arrest came mere days after nine students were arrested in Uganda for protesting against Stanbic Bank while trying to deliver a memorandum also demanding the withdrawal of financial support for the EACOP. Further, in August 2025, 12 student protesters were arrested in Kampala during a sit-in at Stanbic Bank. The police fired tear gas and arrested protesters who were then remanded for 18 days.

These protests are only the latest in what appears to be a systematic repression of EACOP opponents in Uganda. The UN Special Rapporteur on Environmental Defenders said, on the day of Total's 2025 AGM, that the company must protect activists linked to EACOP – in light of reports of threats, harassment and violence against EACOP opponents and affected communities.

"Between May 2021 and August 2025, 222 people who were protesting against or critical of the EACOP were arrested."



#### **Gendered impacts**

In 2019, Oxfam commissioned a gender analysis of the Environmental and Social Impact Assessments (ESIAs) of the EACOP. It found that although the ESIAs identified many potential impacts of the project on women, they overlooked gaps such as limited sex-disagregated data; a lack of nuanced understanding of the impacts on women, including the impacts of women losing access to land if resettled; the implications of the EACOP on household gender relations and unpaid care work; and the impact on the health and safety of women and girls.

A May 2024 "Women on the Frontline" report by Multinationals Observatory provides more up-to-date information on the gendered human rights impacts of the pipeline. The report found that EACOP reinforces gender inequalities by impacting their livelihoods and exposing them to risks including assault from the project's new male workforce. The EACOP compensation process includes the opening of joint bank accounts for spouses, which, the report found, led to women losing decision-making power over household funds.

In 2022, Just Finance reported that single women or those abandoned by their partners were often excluded from resettlement planning and were left without compensation. This is because farmland is traditionally owned by men but cultivated by women. Despite the project's Gender Equality and Social Inclusion Policy, the women interviewed for the study reported they were left worse off by the project and were often shut down when voicing their concerns.

A December 2024 report, "Heated: Human rights, frontline communities, and oil in Uganda" by the International Federation for Human Rights (FIDH), Avocats Sans Frontières (ASF) and the Civic Response on Environment and Development (CRED) also highlighted how women face economic exclusion. The report also found an increase in sexual and gender based violence, particularly in the Kingfisher area, committed by security forces and project personnel.

#### Resettlement and harassment

The FIDH report, a follow-up to community-based impact assessments carried out in 2020 and 2022, has documented serious human right abuses around Kingfisher, Tilenga and along the EACOP route. Around Kingfisher, security forces and local authorities have removed local populations from their homes at gunpoint and without compensation. The securitisation of the area has increased surveillance and intimidation, with local fishing communities reporting frequent arrests and mistreatment.

According to a May 2025 report by Just Finance, up to two-thirds of the 12,000 residents living in 13 villages near the Kingfisher oil fields have either been forcefully displaced or fled due to the activities of the Uganda People's Defence Force (UPDF) in securing the project.

It took Total three to five years after the initial property evaluations to compensate Project Affected Persons (PAPs). Many PAPs considered this compensation inadequate as they struggled to buy replacement land, often settling for less land that is farther away from their pre-displacement homes and with poorer soil quality. A November 2023 assessment of the socio-economic impact of the EACOP's resettlement and compensation activities by AFIEGO found that 41% of EACOP PAPs received low productivity replacement land and that only 3.3% of respondents said their land was productive. An April 2024 report by the Haki Defenders Foundation and the Urban Institute at the University of Sheffield found that families who received resettlement houses often found them inadequate for their needs. The standardised houses were located far from healthcare or water infrastructure and often had one bedroom and a small sitting room, regardless of family size.

Since a December 2023 court ruling granting the Ugandan government's request for the forceful eviction of 42 Tilenga households for the project, the government has sued other landowners in similar cases. In October 2024, another verdict was delivered against 80 households and, in January 2025, communities petitioned the Ministry of Lands, Housing, and Urban Development for protection.

Total has postponed the release of a report it commissioned in 2024 to evaluate the land acquisition process, while CNOOC has not reacted to allegations of human rights abuses in Kingfisher. This falls short of the requirements of Principle 5 of the Equator Principles, which require signatories (such as Standard Bank) to ensure the client conducts an Informed Consultation and Participation process and make appropriate Assessment Documentation readily available.

#### Affected communities keep speaking out

In April 2024, AFIEGO published a booklet with ten stories documenting the experiences of people whose land has been compulsorily acquired for the Tilenga and EACOP projects.

- Pitiyedi Mugisha was forcefully evicted with her family for the third time as a result of a high court ruling in 2021. She was prohibited from growing crops on her land in 2019, and had to wait for four years before receiving compensation, which she considered inadequate. Total has refused to construct a new house for her family, consisting of her husband and 10 children. Part of the family now lives in a onebedroom shelter; others have to live with neighbours.
- Johan Kiiza had to drop out of school as a result of inadequate compensation from Total. His mother used to cultivate and sell crops from land that was passed down from her grandfather. The compensation paid by the project had to be divided amongst all the grandchildren, leaving Johan's mother with only USD 509 for the land and with no means to send Johan to school.
- Alice Kemizano is a widow who inherited a 12-roomed house, land, and crops from her husband. Her inheritance is now under threat, as Total only wants to compensate her for land and crops and to provide a standardised 1-bedroom house to replace her current larger property.

EACOP Finance risk update No.6

### 4. Nature and biodiversity updates

## **EACOP** has immense impacts on nature and biodiversity

The Tilenga oil field, which together with the Kingfisher oil field will supply the EACOP pipeline, is partially situated in the Murchison Falls National Park in Uganda, a habitat for 144 mammal species, 556 bird species, 51 reptiles, and 51 amphibians, and home to the Murchison Falls-Albert Delta System Ramsar site. In addition, approximately 460 km of the pipeline will be within the freshwater basin of Lake Victoria, which supports the livelihoods of more than 40 million people in the region. In Tanzania, almost 2,000 square kilometres of protected wildlife habitats, the Biharamulo Game Reserve and Wembere Steppe Key Biodiversity Areas, will be negatively impacted by the EACOP project. The planned pipeline trajectory also crosses the Great Rift Valley, which has registered seismic events up to 6.8 on the Richter scale, significantly increasing the risk of oil spills.

### New spatial analysis shows well pads in Murchison Falls, risk to Victoria Nile

Analysis of <u>satellite imagery</u> by Earth Insight, published in September 2025, shows that 38km of roads and nine well pads have already been built within Murchison Falls National Park. It also shows roads cleared for the pipeline reaching the Victoria Nile riverbank, which the researchers state "signal[s] an imminent, high-risk crossing. [...] Any incident here could trigger cascading impacts on wildlife, local livelihoods, and water security, compounding the threats already imposed by oil development within Murchison Falls National Park."

In total, the spatial mapping shows the EACOP running through 44 protected areas registered in the World Database on Protected Areas and seven Key Biodiversity Areas, despite Total's claims that the project does not cross any Ramsar zones or International Union for Conservation of Nature (IUCN) sites.



EACOP Finance risk update No.6

#### Still ignoring best practices

In both Uganda and Tanzania, the EACOP poses oil spill risks to groundwater sources as the pipeline will pass through critical sources of water, relied upon by communities. Since at least 2019, observers have criticised Total for opting for the lowest-cost open cut trenching method for many water crossings, rather than the industry best practice of horizontal directional drilling. Experts argue that open cut trenching will destroy biodiversity and contaminate the air, flora and arable land around the pipeline. The project developers have still not addressed these criticisms.

In the same vein, CNOOC has centred its infrastructure on the shores of Lake Albert, in the Buhuka Flats, despite the Kingfisher ESIA acknowledging a 2.7% wetland loss in these Flats due to the construction of a production facility in the area. Communities living around the lake also report that CNOOC's activities have already been polluting Lake Albert, depriving fisherfolks of their livelihoods.

Total has also failed to respond to an <u>independent expert study</u> showing that it could reduce the number of well-pads in the Murchison Falls National Park from ten to one, using the best available technology. In 2022, the Dutch asset manager ACTIAM divested \$4 million in Total holdings, <u>partly because</u> of the risk of pollution to freshwater supplies.

### "Murchison Falls National Park is dying"

Analysis by Earth Insight showed that as of June 2025, 38 kilometres of roads and nine well pads were built within the National Park. Communities that live around Murchison Falls National Park report that the Tilenga oil project infrastructural developments have had negative impacts on wildlife. Vibrations from the drilling rig have caused elephants to move from the park to surrounding communities. The elephants are destroying cropland, and five people were reported as killed by elephants between 2023 and April 2024. Light pollution in the Park is also a risk to nocturnal wildlife such as leopards, lions and birds. Further, motorised traffic as a result of the

project and increase in human population has increased poaching as well as noise and air pollution risks. As one research respondent who participated in an assessment of the impact of Total's Tilenga oil project on wildlife in the park said: "Murchison Falls National Park is dying and a combination of climate change impacts, poaching and oil activities are to blame."

### 5. Climate risks updates

### **High emissions**

At peak production, the pipeline will carry 216,000 barrels of crude oil per day and release over 33 million tonnes of CO2 emissions each year. This is far higher than the current combined emissions of Uganda and Tanzania. Studies from the Climate Accountability Institute (CAI) estimated 379 million tonnes of greenhouse gas emissions across the full EACOP value chain encompassing construction operations, refining and product use over its 25-year lifetime. The emissions could be even higher if the EACOP is used for other oil fields in Uganda, Tanzania and the DRC, some of which are located in peatlands that could store about 30 gigatons of carbon.

#### Not aligned with climate commitments

The IEA made clear in 2021 that new oil projects are incompatible with the Paris Agreement to limit global warming to 1.5°. As early as 2019, the Carbon Tracker Initiative identified three of the Tilenga blocks as among the top 15 projects that were not viable under the IEA's less stringent Sustainable Development Scenario to limit global warming to between 1.7° and 1.8°.

### 6. Legal risk updates

#### **Pending legal cases**

Arguments challenging the dismissal of the 2020 lawsuit brought against Uganda and Tanzania by four East African CSOs were heard in February 2025 by the Appellate Division of the East African Court of Justice (EACJ). The appeal argues that the November 2023 dismissal on procedural grounds was unfair and seeks to have the case reconsidered on its merits.

In 2023 a complaint against US-based insurance broker, Marsh, was brought to the US National Contact Point (NCP) for the OECD Guidelines for Multinational Enterprises by Ugandan, Tanzanian and US human rights and environmental groups. The complaint alleges that Marsh's provision of insurance brokerage services for the EACOP constitutes a breach of the company's responsibilities under the OECD Guidelines. The complaint is still pending.

A pending "climaticide action" criminal complaint was filed in 2023 by Darwin Climax Coalitions, Sea Shepherd France, Wild Legal and Stop EACOP/ Stop Total en Ouganda. The plaintiffs assert that Total can be held responsible for failure to fight a disaster, involuntary homicide, unintentional injury to persons, and destruction or damage to property.

Following an initial hearing against Total, heard in May 2025 regarding the company's compliance with France's Duty of Vigilance Law, the Paris Civil Court issued an order in September for Total to release essential documents. This is a significant step for the case filed in June 2023 by a coalition of five French and Ugandan CSOs, 26 people directly affected by the Tilenga and EACOP projects, and Ugandan human rights defender Maxwell Atuhura. The plaintiffs are seeking reparations for damages they allege have been incurred as a result of the project.

Total <u>appeared</u> before a French court in June 2025 in a landmark trial on greenwashing. The case was filed in 2022 by Greenpeace France, Friends of the Earth France and Notre Affaire

à Tous, supported by ClientEarth, and argues that the company's <u>'reinvention'</u> ad campaign breaks European consumer law. The case continues.

#### **Failures to comply with Equator Principles**

In November 2022, the East African insurer Britam Holdings and client to the International Finance Corporation (IFC) decided not to provide insurance to the EACOP after evaluating the environmental and social risk in compliance with the IFC Performance Standards. The decision was confirmed by the Compliance Advisor Ombudsman (CAO) in response to a complaint submitted in 2021 by affected communities in Uganda represented by Inclusive Development International. The IFC Performance Standards underpin the Equator Principles.

The EACOP has obtained a term loan from banks including Equator Principles signatory Standard Bank. As such, the project needs to comply with the Equator Principles; the banking sector's standard for managing environmental and social risks when financing large infrastructure projects. However, Standard Bank has not shown publicly how the project meets the Equator Principles, and appears to be in breach of its obligations. A 2022 analysis of the project's compliance raised serious issues, including shortcomings in project-related assessments and consultation processes required by Principle 5. For example, key assessments, reviews, and greenhouse gas emissions data were kept confidential for years, and grievance mechanisms were found to be ineffective. The analysis also found that the EACOP ESIA did not have a robust oil-spill emergency response plan, in violation of the IFC's Performance Standard 3 and 4. The analysis also highlights how the project fails to meet Performance Standard 5 and 6 in its improper land evaluation process and harm to protected natural resources.

EACOP Ltd has published a 2023 non-technical summary of the Environmental and Social Due Diligence carried out by the Lenders' Environmental and Social Consultant (LESC), Golder Associates. The summary claims that the review process had not identified "red-flags" against the IFC's Performance Standards 1-8, and that EACOP was "on track" or made "good progress" in most areas. However, the full analysis was not published, and no update on the project's compliance has been published since 2023, although the bank received finance from at least one Equator Principles signatory bank in 2025 (Standard Bank).

The report's conclusions are inadequate for a project that is reported to be 62% complete. For instance, the non-technical summary concludes that the EACOP has made efforts to comply with Performance Standard 5 and 6, in relation to resettlements and biodiversity. Yet, it fails to show how livelihoods for PAPs were restored or how biodiversity is protected and conserved as required.

It is also unclear why the summary was published by EACOP Ltd, and not by the lenders. Financial institutions exposed to Total should request publication of an up-to-date Environmental and Social Due Diligence report illustrating how the project is assessed as complying with the IFC Performance Standards. Standard Bank and other financial institutions lending to EACOP Ltd face claims of non-compliance with the Principles.

# 7. Conclusion and recommendations

The EACOP has become a poster-child for irresponsible fossil fuel infrastructure development globally. The extreme extent of the project's risks to people, their livelihoods, their water sources, the rich surrounding nature including iconic species and national parks, and our shared climate, are crystal clear.

Its rejection by the commercial banks and insurance industry is unprecedented for a midstream oil development. As one of France's "Big Three" banks noted in 2021, "the project is too hard to defend". Yet, the project is being constructed, years behind schedule and billions over budget. As it is built, its impacts are being felt: people are uprooted from their land; elephants flee noisy drilling rigs and stampede into communities; swathes are cut through Murchison Falls and other protected areas for the pipeline and its infrastructure; and project opponents are systematically oppressed and imprisoned. Still, the fear is that the worst is yet to come.

Standard Bank, Stanbic, KBC Bank, the Islamic Development Bank and Afrexim are directly contributing to these impacts, and should prepare to face efforts from affected people to hold them accountable. But they are far from the only financial sector actors exposed to the project's financial, legal, environmental and human rights risks.

### Investors and banks with exposure to Total and CNOOC should:

- Engage robustly with the two companies for the environmental and human rights risks of the project to be urgently addressed;
- Work to compel TotalEnergies to adopt a science-based climate plan, including reducing hydrocarbon production in line with Paris targets; and
- Avoid increasing their holdings or making new general-purpose loans to Total or CNOOC that could fund the EACOP or other fossil fuel expansion plans.

#### Banks and other lenders should:

- Avoid financing the EACOP directly, and declare their intention not to participate in further loan tranches; and
- Exclude underwriting bonds or providing general-purpose loans to Total that could help finance EACOP or other fossil fuel expansion projects.

# The five financiers that have already financed EACOP directly should:

- Strictly monitor compliance with the conditions of the loans and take action in the event of non-compliance;
- Make clear that they will not provide further direct financing for the EACOP;
  and
- Set aside funds to remediate the adverse human rights and environmental impacts to which they have contributed, in line with their responsibilities.

# Acknowledgements and contact details

This update has been written by **Unathi Hlalele** for BankTrack with input from colleagues and partners at endorsing organisations.

It is endorsed by: AFIEGO, Both ENDS, EarthInsight, Environment Governance Institute EGI-Uganda, Inclusive Development International, Just Share and Reclaim Finance.

















### Contact: contact@banktrack.org

Banks and other financial institutions wishing to confidentially discuss the issues raised in this update are invited to contact us via these channels.

# Previous Finance Risk Briefings and updates are available here:

- Finance Risk Briefing Nov 2020
- Finance Risk Update No. 1 Aug 2021
- Finance Risk Update No. 2 Jan2022
- Finance Risk Update No. 3 Jun 2022
- Finance Risk Update No. 4 Apr 2023
- Finance Risk Update No. 5 Feb 2024

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