



N/Réf : 008/NTSP/06/2025

Kinshasa, June 17, 2025

## Trafigura's partners

---

**Subject :** Urge Trafigura to stop its involvement in oil development in the DRC

**Madam, Sir,**

We, the members of the Our Land Without Oil campaign (NTSP), a coalition of over 160 Congolese, African and international organisations, are writing to express our deep concern and strong opposition to your client Trafigura's involvement in oil development in the Democratic Republic of Congo (DRC).

We are writing following the signing of a [memorandum of understanding on February 7, 2025](#), between Trafigura and the DRC Ministry of Hydrocarbons. According to media reports, this partnership aims to develop new oil projects on our territory - an initiative that we consider incompatible [with the environmental, social, and ethical requirements](#) of our time.

We have already [written to Trafigura](#) to express our deep concern and our firm opposition to this development. We are now writing to you as a financier of Trafigura. By doing so, we also wish to draw your attention to the growing legal and reputational risks that this development could pose to your own institution.

### Trafigura's response so far ignores our concerns

In response to the concerns we raised with Trafigura, the company has said its collaboration with the DRC government is "focused on helping the DRC government improve access to energy for its citizens and communities, primarily by improving infrastructure." The company adds that it "does not currently operate upstream oil and gas assets, nor do we directly finance exploration." This response is undermined by [news reports](#) that, under the agreement, Trafigura would "use its expertise and network of investors to help the DRC develop its oil potential", and that the partnership "aims to set up infrastructure for fuel distribution, such as the pipeline project linking the oil port of Muanda to Kinshasa." In short, it is clear that this agreement is explicitly aimed at tackling the failure of the recent auction of oil blocks and extracting the country's oil reserves. The Memorandum of Understanding itself has not been released, and we are calling on Trafigura and the DRC government to release it.

## Your responsibility as financial partners

As banks and financial institutions supporting Trafigura, you play a crucial role in the company's strategic decisions. Your financing and guarantees make its projects possible, including those that threaten serious environmental, social and economic consequences for local populations in the DRC.

We are writing to you today to call on you to use your influence to urge Trafigura to withdraw from all oil projects in the DRC. This request is based on the following factors:

### A blatant contradiction with climate commitments

Trafigura [claims](#) it wants to reduce its environmental footprint, including by decarbonising its operations, investing in renewable energy technologies, and achieving carbon neutrality by 2050. Yet its involvement in the massive revival of oil exploration projects, particularly in ecologically sensitive areas of the Congo Basin - national parks, peat bogs, habitats of endemic species - represents a major inconsistency with these stated climate commitments. It would endanger some of the richest forest ecosystems on the planet, emit huge quantities of carbon and seriously threaten biodiversity.

Furthermore, this oil push directly undermines a flagship national initiative: the [Kivu-Kinshasa Green Corridor \(CVKK\)](#), a project dedicated to ecological restoration and sustainable development. By pursuing destructive oil projects in areas that overlap with the CVKK, Trafigura is not only contributing to climate and ecological degradation, but is actively threatening one of Central Africa's most promising and ambitious environmental programmes. The result would be a double blow: accelerating environmental damage while dismantling a visionary path to ecological resilience and long-term prosperity for the Congolese people.

There is a widespread consensus that developing any new oil and gas fields is incompatible with limiting warming to 1.5°C. Yet the agreement signed with DRC in February reportedly includes a commitment to support the development of the upstream oil sector in the country, in order to boost hydrocarbon exploitation. In light of this commitment, further finance for Trafigura would be incompatible with the bank's responsibility to support the Paris Agreement goals.

### A plan with destructive consequences

The call for tenders launched in July 2022 for the allocation of 27 oil blocks was officially [canceled in October 2024](#), due to the absence of credible bidders and serious irregularities: [total lack of transparency, no serious environmental and social impact assessment, and suspicions of conflicts of interest](#). This fiasco illustrates both the Congolese oil sector's inability to guarantee any economic viability, and the DRC's lack of credibility among companies in the sector, which no longer see it as a trustworthy partner.

In Muanda, where oil exploitation began in 1975, fifty years of extraction have wrought economic, social, and ecological disaster. Far from bringing any progress, [this activity has worsened poverty, polluted land and water, and led to serious and repeated violations of human and environmental rights](#), causing irreparable harm.

Oil in Muanda has increased dependency, destroyed living conditions, and fueled injustice. As such, it has been the subject of [legal action](#). This operation benefits neither the state nor the population – rather, it impoverishes, divides, and destroys.

By choosing to ignore these alarming precedents and engage in oil development in the DRC, Trafigura exposes itself to the same risks and the resulting legal, financial and reputational consequences. Continuing on this path would associate the company with a sector that has proven unsustainable and harmful at every level. It would also increase your bank's exposure to social unrest, legal challenges, environmental harm and long-term reputational damage. Rather than learning from history, Trafigura risks repeating and amplifying – the harms already inflicted by decades of oil extraction in Congo.

### **The illusion of development at the heart of a corrupt system**

The discourse promoting oil as a lever for development and energy autonomy, as presented in the memorandum of understanding signed between Trafigura and the Ministry of Hydrocarbons, is an illusion. The revenues benefit a narrow elite and multinational corporations, while the majority of Congolese people remain in poverty and face an extremely severe food crisis. This imbalance is worsened by [an alarming level of corruption](#), particularly in the extractive sector, known as one of the most vulnerable to illicit practices. In the DRC, [this corruption is systemic](#). In such a context, engaging in oil projects exposes Trafigura – already involved in several scandals on the continent – to increased risks of legal action and sanctions. It also poses a serious threat to the reputation, legal compliance, and security of future actors involved in a highly sensitive and unstable sector.

For its financial partners, this also increases the need for enhanced due diligence under anti-money laundering (AML) and Know Your Customer (KYC) obligations, given the systemic corruption documented in the DRC's extractive sector and the elevated risk profile associated with Trafigura's potential involvement in these oil projects.

### **A driver of security and political risks**

In a context already marked by instability, social fragility, climate-induced [migration](#) and violence, oil exploitation would only exacerbate existing tensions. Land conflicts, insecurity around fishing areas, militarization of exploration zones, and repression of environmental and human rights defenders already exist within the oil exploration regions. Exploitation would certainly aggravate these issues. The precedent of extractive projects in sensitive areas shows that far from pacifying, oil causes destabilization.

### **Legal risks: direct exposure for Trafigura and its financiers**

By supporting oil expansion in the DRC, Trafigura is exposing itself to legal proceedings and non-judicial accountability. This includes complicity in human rights violations, failure to comply with international standards (such as the OECD Guidelines for Multinational Enterprises, UN Guiding Principles, and IFC Performance Standards), and corruption. These acts could trigger Trafigura's liability before European or American courts, under principles of extraterritorial jurisdiction.

Similarly, continuing to finance Trafigura following the signing of this memorandum of understanding exposes the company's financiers to accountability risks. In line with the international standards noted above, current financiers of Trafigura are likely to be at least 'directly linked' to adverse impacts on human rights and the environment arising from oil expansion. This creates a clear responsibility for financiers to take action to prevent and mitigate these adverse impacts. If banks are unable to show clearly that they have taken such action, they may face challenges, including through judicial or non-judicial accountability mechanisms.

### **A threat to the reputation of Trafigura and its financiers**

Trafigura's involvement in this project directly contradicts the image of social responsibility it seeks to promote. For example, Trafigura's [Corporate Social Responsibility Policy](#) commits the company to "earn and maintain a social license to operate" in any country where it operates. Given the breadth of civil society and community opposition to oil sector development in the DRC, there is no such social license for Trafigura's involvement in the country.

Already criticized for its practices in the cobalt and toxic waste sectors, finance for Trafigura already carries reputational risk for its financial partners. In the light of these recent developments, this risk is likely to become more acute.

Our clear demands to your institution:

In light of the evidence of recent, general-purpose finance from your institution to Trafigura (details available on request), we ask you to take the following urgent steps:

- Exert your influence on Trafigura to withdraw immediately from the recent Memorandum of Understanding and from all upstream and midstream oil projects in the DRC.
- Suspend all financial support to Trafigura while it pursues destructive oil extraction and production activities in the country.
- Strengthen your Environmental, Social and Governance criteria by clearly excluding all finance to companies or projects that are expanding oil and gas production, and to all projects that contribute to environmental destruction and human rights abuses.
- Make a public commitment not to finance or support any company involved in oil extraction and production in the DRC.

### **Conclusion**

Your institution can play a decisive role in preventing an ecological and social disaster in the DRC. By exerting your influence on Trafigura, you demonstrate your commitment to responsible and sustainable finance, and you also protect your reputation with investors, regulators and the general public.

We invite you to let us know your position on this crucial issue by July 10, 2025. In the absence of a clear response, we reserve the right to continue our advocacy efforts at national and international level, including targeted actions with your shareholders, customers and regulators.

We are also available to answer your questions in writing or via a meeting online or in person.

Please accept, Madam, Sir, the expression of our determination to defend our land, our lives and the dignity of the Congolese people.

The member organisations of the Notre Terre Sans Pétrole coalition

**Notre Terre sans Pétrole**



**Pascal Mirindi**

*Campaign coordinator*

## **Signatory Organizations**

### **Organizations from the Democratic Republic of the Congo**

- 100% Jeune asbl
- Actions pour la Promotion et Protection des Peuples et Espèces Menacés en RDC
- Actions pour le développement intégral par la conservation communautaire, ADIC
- ADEPAR
- Alerte Congolaise pour l'environnement et les droits de l'homme, ACEDH
- Amani Institute ASBL - Rutshuru
- AMIS HUMANITAIRE POUR LE DÉVELOPPEMENT
- Association Congolaise pour le Relèvement Communautaires (ACRC)
- Association d'Entraide pour le Développement Intégral de la Femme (AEDIF)
- Association des Filles Mères (AFM)
- Association des Mamans pour la Lutte contre le Traumatisme, AMALUT en sigle
- Association des pêcheurs pour le Développement Communautaire
- Badilika Droits Humains
- Bureau d'Ecologistes pour Impacts Environnementaux (BEIE)
- Cadre d'Acteurs et d'Actions pour le Développement Durable (CAADD)
- Cadre de Concertation sur les Ressources Naturelles
- Cadre des acteurs de la société civile pour gouvernance des ressources naturelles dans le Kongo central (CAGRNI/KC)
- CÉLÉBRONS LE COURAGE DE LA FEMME
- Centre national de développement de la femme rurale du Congo (CÉNADEFruc)
- Centre congolais pour le droit du développement durable (CODED)
- Centre d'encadrement Intégral en approche genre CEDI -AG. En sigle
- Cercle des Jeunes Ambassadeurs du Climat (CJAC)
- Climate Clock
- Coferd bandundu
- Collectif d'intellectuels pour le Renforcement de l'Education "CIPRE asbl"
- Congo Green Solution
- Congo Nouveau
- Conseil Regional des Organisations Non Gouvernementales de développement (CRONGD) - Mbuji-Mayi
- Consortiul CBFC
- CORAP
- Corps de Volontaires pour le Développement Durable et Multi sectoriel (COVODUM)
- CRONGDKC
- Defense Environnementale et Développement Durable (DEDUR)
- DRC CLIMATE CHANGE NETWORK
- DYCOPELA "DYNAMIQUE COMMUNAUTAIRE POUR LA PROTECTION DE L'ENVIRONNEMENT DANS LE RIFT ALBERTIN"
- Dynamique des Groupes des Peuples Autochtones (DGPA)
- Dynamique pour le Droit, la Démocratie et le Développement Durable, en sigle D5
- Extinction Rebellion Université des Goma
- FECOPEiLE (Fédération des comités des pêcheurs individuels du lac Edouard)
- Fédération Congolaise des Droits de l'Homme et de Développement "FCDHD"
- Fédération des Comités des Pêcheurs du Lac Albert (FECOPELA)
- Femme en action
- FOPED
- Forum des Engagés pour le Développement Durable (FORED)
- Groupe d'Actions pour le Développement (GRAD) en sigle
- Héritier du Développement du Congo (HDC)

- Héritiers de la Justice - Bukavu
- Idel
- Initiative Bonne Gouvernance des Ressources Naturelles au Kivu
- Initiative des Femmes pour le Développement Durable "IFEDD"
- Initiative pour le Développement Local (IDEL)
- Innovation pour le Développement et la Protection de l'Environnement
- Insitut pour la gouvernance et education electorale
- Ligue des associations des jeunes (Liaje)
- Mouvement citoyen debout congolais (MCDC)
- Mouvement citoyen Filimbi
- Mouvement de jeunes pour la protection de l'environnement en RDC (MJPE-RDC)
- Mouvement des jeunes en actions pour le changement en RDC (MOJAC-RDC)
- ONG Créativité & Développement
- ONG IGED
- PARLEMENT DES JEUNES DE LA RDC
- Parlement des jeunes du Kongo Central
- Plateformes des organisations des femmes des quartiers populaires "POFQ"
- Programme d'appui au Développement Communautaire (PADC) RD Congo - Bunia
- Rassemblement des Personnes handicapées pour le Développement Intégral (RPDI) - Bunia
- Regroupement des unions des associations des pêcheurs Inga Isangila et Lufu
- REJOSSA RDC
- Réseau CREF
- Réseau des journalistes engagés pour environnement et climat dans la province du Kongo central (RJEC-KC)
- Réseau des Organisations pour la Conservation et la Protection de l'Environnement (REOCOPE)
- SAVE MY WORLD
- Save Virunga
- Seconde Chance - Bunia
- Solidarité Paysanne (SP)
- Solidarité pour la Protection des Droits de l'Enfant (SOPRODE)
- Synergie des Jeunes pour le Développement et les Droits Humains "SJDDH"
- Talitha koumi
- TRAFFED-ProgramGreenfaithRDC
- Trans Girls Can (TGC)
- Union Congolaise pour la Conservation de la Nature et le Développement durable (UCCND ASBL)
- Wonderfull Business
- Young Congo Farmers Alliance
- Acteurs pour le Développement Durable et Préservation des Forêts en Afrique en sigle ADDPFA Asbl
- Association des jeunes pour l'avenir du Congo AJARC en sigle
- Association des Jeunes visionnaires pour le développement du Congo AJVDC
- Ressources Naturelles et Développement ( RENAD )

## ***International Organizations***

- Advocates for Community Alternatives
- Association des Jeunes Arc-en-ciel pour la Stabilité Sociale en Afrique (AJASSA)
- CRADESC
- Rainforest Foundation UK
- GreenFaith France
- BankTrack
- Tasha Research Institute Africa (TASHA)
- groundWork, Friends of the Earth, South Africa
- Africa Institute for Energy Governance
- Green Rwanda Initiative
- WoMin African Alliance
- Amis de la Terre France
- RSCDA-IO/CRAAD-OI
- Hawkmoth
- Inclusive Development International
- 350Africa.org
- Laudato Si' Movement
- Centre for Citizens Conserving Environment & Management (CECIC)
- Quest For Growth and Development Foundation
- Fridays for Future Uganda
- Umo Isua-Ikoh
- Save Virunga
- Rainforest Rescue
- International Rivers
- The Oakland Institute
- Vostile Creatives Trust
- Africa Institute for Energy Governance
- Youth for Green Communities (YGC)
- Society for Women and Youths Affairs (SWAYA)
- Climate Rights International
- Serapeng sa Dithhare and Environment npc
- Women on Environment Mission
- Fridays for Future Sierra Leone
- Buliisa Youth Circle
- East African Crude Oil Pipeline Host Communities
- Africa Just Transition Network/Africa Coal Network
- Environment Governance Institute
- Peace Point Development Foundation-PPDF
- Renewable Energy Coalition
- GCEC Cameroun
- Citizens Network for Community Development Zambia
- GREENLEAF ADVOCACY AND EMPOWERMENT CENTER
- Care For Environment
- African Centre for Biodiversity
- Center for Environmental Research and Agriculture Innovations (CERAI)
- Youth For Environmental Justice and Climate Action (YECA)
- Strategic Response on Environmental Conservation (STREC)
- Youth for Nature Conservancy

- Women for Green Nature
- Center for Conservation and Ecoenergy Initiative (CCEI)
- Environmental Rights Action/Friends of the Earth Nigeria
- Environment Governance Institute Uganda
- African Initiative on Food Security and Environment (AIFE)
- Center for Transnational Environmental Accountability (CTEA)
- Oil Change International
- Jamaa Resource Initiatives
- Publish What You Pay Madagascar
- Global Justice Clinic, NYU School of Law
- Save Lamu Organization
- Extinction Rebellion Global
- Tanzania Wote Equality Alliance
- Jamaa Resource Initiatives
- Congo Basin Alliance