



Patrick Pouyanné, Chief Executive Officer
Steven Dickinson, Group Lead Biodiversity & Water Resources
TOTAL Headquarters
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92078 Paris la Défense, France

Object: Concerns over impacts on chimpanzees of Total activities in Uganda

September 16, 2020

Dear Mr. Pouyanné and Mr. Dickinson,

We are writing to you to raise concerns regarding the potential impacts on chimpanzees of Total's activities in Uganda, through your Tilenga project, as well as from EACOP (in which Total has a 45% ownership), and by your recent acquisition of the Tullow project located in the same landscape. These projects overlap with c.50% of the range of the Endangered Eastern Chimpanzee (*Pan troglodytes schweinfurthii*) in Uganda and have the potential to lead to significant negative impacts to populations of this subspecies.

The IUCN Species Survival Commission Primate Specialist Group Section on Great Apes (IUCN SSC PSG SGA) raised concerns during the public consultation phase of the Tilenga ESIA (see letter sent to NEMA on November 9th 2018 attached as an appendix), but did not receive a response and recent information we were sent from our colleagues on the ground indicates that the issues we raised have not been addressed satisfactorily. Moreover, in the last few months we have received information from chimpanzee experts and other stakeholders in this region indicating that chimpanzees are already being impacted by these projects. Notably, the upgrading of the road going into Murchison Falls National Park and crossing Budongo Forest Reserve in the north has changed the ranging patterns of some chimpanzee groups. The chimpanzees are now moving closer to local communities and there has been an increase in the incidence of chimpanzees being injured by snares in this area. This is worrisome as pushing chimpanzees outside of remaining forest fragments into neighboring farmland has the potential to increase zoonotic disease transmission and human-chimpanzee conflicts which often results in the killing of individuals. According to local stakeholders and chimpanzee experts, no mitigation

measures have yet been put in place by Total. Simple mitigation measures such as speed humps have proven efficient in reducing the risk of vehicles hitting chimpanzees and should have been developed in consultation with chimpanzee experts active in this region while upgrading the Hoima-Butiaba-Wanseko road as well as the Hoima-Kaiso-Tonya road which intersects multiple chimpanzee territories.

One of our greatest concerns is that no suitable chimpanzee baseline data have been collected by Total to inform mitigation. As a result, we are worried the project has not planned adequate management of its impacts on chimpanzees. Measures should have already been in place by now to increase the resilience of this fragile ecosystem. Total's activities will exacerbate fragmentation of this habitat, reducing connectivity and potential dispersal opportunities for chimpanzee females, thus jeopardizing the long-term viability of chimpanzees in this area.

The Albertine Graben region is an important global biodiversity hotspot which harbours populations of chimpanzees living inside and outside protected areas. Chimpanzees, and other threatened primate species, have been used as a flagship species by many ecotourism programs and bring significant sustainable revenue to the local population and protected areas in the region. Furthermore, several long-term chimpanzee research sites have been established in this area, including Budongo Conservation Field Station, Bulindi Chimpanzee and Community Project, and Bugoma Primate Conservation Project. From the information we have gathered, there seems to have been insufficient local consultation as many of these local stakeholders have not received any information on these projects. Engaging with these stakeholders would help your projects develop appropriate mitigation measures. With Uganda becoming a recent member country of EITI and with Total being one of its founding members, we would hope that better stakeholder engagement on these issues will be quickly resolved.

We would welcome the opportunity to discuss these issues with you, to receive more information on your project and to understand how you plan to mitigate impacts to chimpanzees. The IUCN SSC Primate Specialist Group ARRC task force (<https://www.arrrctaskforce.org/>) constitutes advisory panels for such projects to offer advice, review documents and provide general oversight to avoid and minimize impacts on apes.

We look forward to hearing from you.

Sincerely,

Rebecca Kormos

Dr Rebecca Kormos, on behalf of the IUCN SSC Primate Specialist Group, ARRC task force

Appendix 1: Letter sent to NEMA on November 9th 2018

IUCN SSC Primate Specialist Group Section on Great Apes, EEAI Task Force (Energy, Extractives and Associated Infrastructure) Comments on the Tilenga Project

Thank you for making the ESIA for the Tilenga Project available for public comment. We are a Task Force within the IUCN/SSC Primate Specialist Group, Section on Great Apes, whose mission it is to work specifically at the interface between apes and EEAI Projects (Energy, Extractives and Associated Infrastructure) and search for ways for EEAI projects to better avoid, mitigate and compensate for negative impacts on apes. We have reviewed the Tilenga Project ESIA and would like to express some concerns specifically about how this project impacts chimpanzees.

As stated in this ESIA, chimpanzees are listed by the IUCN Red List as Endangered. Furthermore, chimpanzee distribution range in Uganda is limited to the western portion of the country and overlaps greatly with your project's area of influence. This brings concern to the ape expert communities, especially given the direct impacts that may occur on Budongo Forest Reserve, where there is one of the oldest long-standing research station and conservation program on wild chimpanzees (started in c. 1960), and potential indirect impacts to the wider area where chimpanzees range and use unprotected forest fragments between Budongo and Bugoma Forest Reserves. These areas are already under tremendous pressure from human encroachment, and we worry your project may exacerbate threats to chimpanzees in this area. Our main concern is that the ESIA does not present sufficient details outlining these impacts, nor the mitigation and compensation strategies that will be put in place to lessen these impacts on chimpanzees.

The ESIA does not highlight properly if and how you have estimated the number of chimpanzees that could be impacted directly and indirectly by the project. It is also unclear to the reader if further targeted chimpanzee surveys were conducted as part of this ESIA in order to provide a basis for this assessment. It is critical to have this kind of information if the project wants to align with best practice standards (as it is suggested in this document). For the project to demonstrate no net loss/net gain, a certain level of quantification will be necessary. At the moment it is unclear from the document how the project is going to achieve this objective.

Our Task Force would be happy to engage with you further in discussing details that would be needed before IUCN considers this ESIA complete.

Sincerely,

Rebecca Kormos

Dr. Rebecca Kormos

EEAI Task Force Leader