



Uganda

TotalEnergies EP Uganda

O/Ref : DG 2025/2-1304.

Office of the High Commissioner
United Nations Humanrights
1211 Geneva 10,
Switzerland.

SUBJECT: Draft Response from TotalEnergies EP Uganda to the UN.

Kampala, September 15th, 2025.

TotalEnergies SE has forwarded to us your letter dated July 2, 2025 (reference: AL OTH 34/2025) relating, among other things, to the investments and activities of TotalEnergies EP Uganda (TEPU) in Uganda, a subsidiary of TotalEnergies SE. Although your letter specifies that a similar letter will be sent to TEPU, which has not yet received it, you will in any event find our responses to the points and questions raised, without prejudice to the rights, defenses, or remedies that TotalEnergies SE or one of its subsidiaries may have.

1. The Kingfisher Development Area project

TotalEnergies EP Uganda is an investor partner in the Kingfisher Development Area project (KFDA) alongside with Uganda Oil Company (UNOC) and CNOOC Uganda Ltd (CNOOC). As the KFDA operator, CNOOC oversees activities, contracts, and relations with external stakeholders (State, communities, civil society), aligned with regulations and international standards, and reports on it to its investor partners in the KFDA.

In line with TotalEnergies code of conduct, TEPU engages with CNOOC on various matters including by sharing its experience and good practices and actions that CNOOC intends to take and for example, investigations led in cooperation with the operator in June 2024.

(Please find [Response to BHRRC on alleged human rights abuses in Kingfisher project area.pdf](#))

2. The Tilenga project

2.1. Human Rights

Regarding your concern to “*respect the human rights of all people involved or affected and help guarantee the safety of climate justice activists in Uganda and Tanzania*”. As for EACOP, TEPU has both adopted and published its Human Rights policies which describe its respective commitments to the respect of the rights of the Human Rights Defenders (HRDs). For many years now, TEPU continuously sought and will keep on seeking to exercise available leverage, proactively as a preventive measure, and reactively when incidents unfortunately occurred, for issues to HRDs. For more information, please refer to the following links:

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

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TotalEnergies EP Uganda Simplified Joint Stock Company Registered capital: €40,000.
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Where protestors against the project are arrested by the Police, TEPU contacts the responsible authorities to advocate for respect of the protestors' rights while in detention, including their right to legal representation, and that they are accorded due process in accordance with the law. For example, during the recent protest on 23rd April 2025 and 21st May 2025, a TEPU security coordinator went to the Kampala Central Police Station (CPS) to meet with the Officer in Charge and to advocate on the need to respect the human rights of the HRDs. Later, the Country Security team followed the cases and regularly met the activists at the prison.

2.2. Land acquisition process

The land acquisition process is carried out on behalf of the Ugandan government in close collaboration with specialized partners and local stakeholders and done in accordance with national laws and aligned with the UN Guiding Principles on Business and Human Rights, and IFC Performance Standards. The land acquisition process is naturally complex due to the co-existence of diverse legal frameworks and land tenure systems in Tanzania and Uganda.

Tilenga project requires to acquire around 1,200 ha. 5,576 Project Affected Persons (PAPs) are economically impacted of whom 228 (4%) are also physically displaced. A PAP corresponds to a group of individuals forming a household or an entity (institution, company) which has been identified, within the framework of the studies carried out for the program of acquisition of the land necessary for the implementation of the Project/ Upstream as having at least one asset impacted by their implementation. An asset can be a dwelling, a construction, a plot of bare or cultivated land, plants, trees, crops.

Resettlement Action Plans ("RAPs") have been developed which present the process of relocating, compensating and resettling people affected by the land acquisition process. The RAPs have been published on the Project website and disclosed to the local communities and PAPs.

As of end of June 2025, 99% of compensation agreements have been signed and paid. All the new residences have been built and transitional support to eligible households is now completed. Activities are now focused on post-acquisition support as required under IFC PS5:

- Delivery of 'Livelihoods Restoration Programs' to eligible households based on the following pillars:
 - Agricultural and animal husbandry related programs (such as improving crop yields, vegetable cultivation, tree planting/commercial nursery, beekeeping...).
 - Vocational training and finance/business management.
 - Assistance in the development of small businesses.

Grievance mechanisms respecting the UNGPs criteria of efficiency have been in place since the beginning of the projects. Dedicated teams provide remedy for the grievances that are received and make sure they are solved in a satisfactory manner for the impacted persons. At end of June 2025, 97% of the grievances received were closed.

2.3. Impacts Assessments

Several independent reviews have been conducted by third parties to ensure that the Tilenga project is carried out in compliance with the best social and environmental practices. Alongside the ongoing dialogue with the local communities, these reviews allow the assessment of effectiveness and potential improvements.



Detailed assessments were carried out (ESIA, Environmental and Social Impact Assessment) of the potential social impacts (particularly access to land and water) and environmental impacts of the Projects. They led to the implementation of measures needed to prevent or minimize these impacts. The environmental and social management and monitoring plans were developed and implemented accordingly.

In January 2022, the Human Rights Impact Assessment Report of the Tilenga project has been undertaken to understand the risks and impacts of the Project on human rights and to develop a proactive and comprehensive Human Rights Action Plan framework for ongoing Human Rights Due Diligence to manage the Project's salient human rights issues, as it moves through the construction and operational phases.

This Assessment builds upon prior human rights studies that the Project has undertaken, notably through the Environmental and Social Impact Assessment (ESIA) and other related studies.

2.4 Biodiversity

Referring to your concerns, please note the following:

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

As a result, of this program implementation, at end of June 2025, 140 000 trees were planted, about 10 000 snares were removed, 1 319 joint patrols were conducted with the Ugandan Wildlife Authority and more than 40 000 invasive species infestation spots were cleared.

On the specific issue of water, about 30,000 m³ of water will be drawn daily from Lake Albert during the first years of production to supply the injector wells and maintain the pressure of the reservoirs and this will decrease after. However, as the Nile has an outflow rate of circa 1,000 m³ per second, the water withdrawn for the Tilenga project needs represents only 30 seconds per day of water taken from Lake Albert.



Yours faithfully,

Philippe GROUEIX
General Manager.

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