



**SPECIAL PROCEDURES**  
**UNITED NATIONS**  
**HUMAN RIGHTS COUNCIL**  
Palais des Nations – 1211 Geneva 10  
Switzerland

November 7<sup>th</sup>, 2025

**Ref: AL OTH 104/2025**

**Attn:** [REDACTED] **Officer-in-Charge**  
**Special Procedures Branch**  
**OHCHR**

Dear Special Rapporteurs and members of the Working Groups:

On behalf of Proman, a global integrated energy company, we sincerely appreciate the communication sent on September 19, 2025 in relation to our ammonia plant project in Topolobampo, Municipality of Ahome, State of Sinaloa, Mexico, which is being developed by our Mexican subsidiary *Gas y Petroquímica de Occidente, S.A. de C.V.* ("GPO").

We appreciate the opportunity to address your observations and concerns, as we share the goal of ensuring that economic development goes hand in hand with respect for human rights, environmental protection, and the social well-being of communities.

Proman, as a global company with more than four decades of experience in the construction and operation of petrochemical plants, has built its trajectory on the values of integrity, safety, sustainability, and social responsibility. These principles have guided the development of the project in Topolobampo, which we conceive as an opportunity to contribute to sustainable regional development, without exception to the commitment to human rights or to protecting a healthy environment.

We fully recognise the importance of the prior, free, and informed consent of indigenous peoples, in accordance with the International Labour Organization (ILO) Convention 169 and the resolutions of the Supreme Court of Justice of the Nation (Mexico).

Therefore:

- We supported the implementation of the consultation processes convened by the Mexican authorities (SEMARNAT – Ministry of Environment & Natural Resources, INPI – National Institute of Indigenous Peoples, SEGOB – Ministry of Internal Affairs, with the participation of the Mexican Human Rights Commission), respecting their guidelines and committing ourselves to maintain openness to new instances of dialogue.
- We have created spaces for direct communication with Yoreme-Mayo communities and other social actors, and we continue strengthening these mechanisms, including permanent working groups with community leaders, fishermen, women, and young people.
- We reiterate that any decisions by the company has and will always be guided by respect for cultural identity, ceremonial sites, and traditional means of subsistence.
- We recognise indigenous ancestral knowledge as a fundamental element for protecting the environment and strengthen our prevention and mitigation measures.

Aware of the value of the Santa María-Topolobampo-Ohuira lagoon system, recognised as a Ramsar site and biodiversity heritage, we have adopted a preventive approach that links environmental protection with the guarantee of fundamental human rights, such as health and access to clean water.

To achieve this:

- We have completed independent environmental and social studies, which have been reviewed by Mexican authorities and independent international auditors, with specific mitigation, compensation, and permanent monitoring plans (please note that our project is developed in alignment with Mexican law regulations, United Nations Sustainable Development Goals, the Equator Principles, IFC Performance Standards, and Common Approaches -OECD / ECA Guidelines-).
- Measures have been implemented to protect mangroves, flora, and fauna, as well as sanitation and restoration programs for areas impacted by previous activities (not related to our project).
- Our industrial processes are designed based on the best international and up to date practices and regulations in safety and energy efficiency, with the commitment to reduce emissions and optimise the use of seawater, always in compliance with international standards and national regulations.

- We have reinforced contingency and industrial safety plans, aligned with international protocols, to guarantee the protection of communities and the ecosystem in the event of any eventuality, prioritising the safety of children and the most vulnerable groups. These have been informed by our many years of operation of similar facilities in other jurisdictions.

Proman and GPO recognise and defend the right of every person and community to express themselves, organise, and participate in public life without fear of reprisals.

In this regard:

- We categorically reject any form of harassment, threat or violence against human rights defenders, social leaders or opponents of the project.
- We have established an open-door policy to receive observations, questions or criticisms, always responding based on verifiable and substantiated information.
- We promote an environment of respect and collaboration, where diversity of opinions enriches decision-making processes.
- We recognise the essential role of human rights and environmental defenders in building more just societies, and we reaffirm our commitment to cooperate with the authorities so that they have safe conditions to carry out their work.

Proman and GPO are fully aligned with the UN Guiding Principles on Business and Human Rights, which set out the corporate responsibility to respect human rights in all its operations.

In particular:

- We have adopted internal due diligence policies to identify, prevent, mitigate, and remediate potential adverse impacts on communities and the environment.
- We have an operational-level community grievance mechanism, designed to provide access to resources and provide a timely response to concerns raised by communities.
- We are willing to share additional documentation and evidence that demonstrates the robustness of our processes and policies.
- We recognise that the effective remediation of any adverse impacts, if they occur, is a business duty, and we are prepared to participate in legitimate processes that ensure access to remedy.

We reiterate our firm conviction that business sustainability is not possible without the inclusive and fair development of nearby communities and without the preservation of the environment. Our project in Topolobampo represents a long-term commitment, and we will spare no effort in addressing, with transparency and good faith, any doubts or concerns expressed by communities, authorities, or international bodies.

In relation to the claims detailed in the document Ref: AL OTH 104/2025, please refer to the response prepared by our subsidiary in Mexico, *Gas y Petroquímica de Occidente, S.A. de C.V.*, in the file with the Ref: AL OTH 103/2025, and the supporting documentation included thereto.

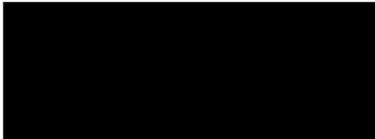
We thank you again for the communication and confirm our total openness to continue participating in this constructive dialogue.

Should you have any questions or require further clarification, please let us know.

Kind regards,



  
*Chief Executive*  
**Proman AG**



  
*Managing Director Legal & Tax - Finance*  
**Proman AG**