



September 2, 2023

To: Dr. Musonda Mumba,
The Secretary General,
Secretariat of the Ramsar Convention on Wetlands of International Importance.

Dear Madam,

RE: REQUEST TO ADD TILENGA- AND EACOP-AFFECTED WETLANDS AS WELL AS VIRUNGA NATIONAL PARK TO MONTREUX RECORD OF WETLANDS

1. INTRODUCTION

Greetings from the undersigned African civil society organisations (CSOs) working to promote environmental conservation, human rights observance and climate action in Africa.

We thank you and your secretariat for promoting conservation of Ramsar and other wetlands across the world. The wetlands protection work that you do is important for climate stabilisation efforts, and we celebrate you, more so as Africa Climate Week (September 4-8, 2023) begins in Nairobi-Kenya.

We are however concerned that your valiant work stands to be undone by Uganda, Tanzania as well as the Democratic Republic of Congo's oil and gas exploitation efforts.

As you may be aware, Ugandan made commercial oil discoveries in the ecosensitive and biodiverse Albertine Graben in 2006. The Ugandan government alongside TotalEnergies and China National Offshore Oil Corporation (CNOOC) are commercialising Uganda's oil reserves through the upstream Tilenga and Kingfisher oil projects that are operated by TotalEnergies and

CNOOC respectively. Oil drilling under the aforementioned projects commenced in June 2023¹ and January 2023² respectively.

The above parties, alongside the Tanzanian government, are also planning to construct the 1,443km East African Crude Oil Pipeline (EACOP) to transport oil from the Tilenga and Kingfisher oil fields to export markets via the port of Tanga in Tanzania.

The Tilenga project is set to affect the Murchison Falls-Albert Delta, a Ramsar site found in Murchison Falls National Park (MFNP). On the other hand, the EACOP is set to affect the following wetlands that are connected to Ramsar Sites in Uganda: Kibale/Bukoora, Kisoma, Kasemugiri and Jemakunya wetlands which are part of the Sango Bay-Musambwa Island-Kagera (SAMUKA) Ramsar Wetland System. The EACOP is also set to affect the Katonga wetland system, which is connected to the Nabajjuzi Ramsar Wetland³.

Further, in July 2022, the DRC government launched an invitation to tender for 27 oil and 3 gas blocks. Some of these blocks are located in Virunga National Park, a Ramsar site as proclaimed in 1996. Oil exploitation in this park will undoubtedly result in the loss of a significant part of humanity's wetlands in general, a major threat to the rich biodiversity dependent on this site. Moreover, with several Ugandan government officials having indicated that the EACOP could be used to transport oil from the DRC, the EACOP becomes a threat to conservation of biodiversity in Virunga National Park.

While the Ugandan government, CNOOC and TotalEnergies have committed to protect wetlands and biodiversity through the Tilenga and EACOP Environmental and Social Impact Assessment (ESIA) reports, we are afraid that their inability to avoid, minimise or mitigate the impacts seen so far under the compulsory land acquisition processes for the above projects portends poorly for the conservation of Ramsar wetlands. The above parties have also failed to manage other impacts such as floods and dust, light as well as noise pollution from the Kingfisher and Tilenga projects in Uganda. This minimises our confidence in their capacity or willingness to manage their projects' impacts, including on Ramsar wetlands.

Through this letter therefore, we are calling on you to add the Tilenga and EACOP-affected wetlands to the Montreux Record, a “record of Ramsar Sites where changes in ecological character have occurred, are occurring, or are likely to occur¹⁴”.

¹ The Independent (2023); *Total starts drilling in Murchison Park*: <https://www.independent.co.uk/totalenergies-starts-drilling-in-murchison-park/>

² The New Vision (2023); *We are moving forward: Museveni launches oil drilling at Kingfisher*: <https://www.newvision.co.ug/category/news/we-are-moving-forward-museveni-launches-oil-d-152373>

³ Africa Institute for Energy Governance (2023); *Factsheet on EACOP-affected wetlands*: <https://www.afiego.org/download/factsheet-on-eacop-impacted-wetlands-in-uganda-july-2023/?wpdmdl=3073&refresh=64e387c362fcb1692633027>

We are also calling on you to engage the Ugandan, Tanzanian and Congolese governments as well as CNOOC and TotalEnergies to stop all oil activities that are affecting or could affect Ramsar sites in Uganda, Tanzania and the DRC. We elaborate further below.

2. CONCERNS

(a) Ecosensitive Albertine Graben: The Albertine Graben, where the Ugandan government, CNOOC and TotalEnergies are developing the Tilenga as well as Kingfisher oil projects and where the EACOP will commence its journey to the port of Tanga in Tanzania, is an ecosensitive and biodiverse area of international importance. Notably, the DRC government is also seeking to license oil exploration activities for several blocks within the Albertine Graben. The graben is home to several wetland basins covering over 52,556 sq. km. These include the Lake Albert, Victoria Nile and Lake Edward wetland basins⁴ among others. The basins cover 18,037 sq. km, 27,389 sq.km and 7,130 sq.km1 respectively. The wetland basins host endangered species such as the Shoebill, Grey Crowned Crane, Papyrus Gonolek and others⁵. The wetlands are also home to mammals such as hippopotamus, crocodiles and sitatunga, which commonly occur in the estuarine and Lake Albert delta swamps⁵. Uganda, Tanzania and the DRC’s oil exploitation plans including development of the EACOP are a danger to this biodiversity and the wetlands that host them.

(b) High-adverse to critical impacts expected: While we are concerned by the oil exploitation activities in the Albertine Graben in general, we would like to draw your attention to the planned activities that could affect the Murchison Falls-Albert Delta Ramsar Wetland. Under TotalEnergies’ upstream Tilenga oil project in MFNP in Uganda, a pipeline, known as the Victoria Nile crossing, is set to be constructed under River Nile. The following is noted in the Tilenga oil project’s ESIA report, “The HDD [Horizontal Directional Drilling] Construction Area north of the Nile and pipe stringing area will be located within the boundary of the Murchison Fall–Albert Delta Wetland System Ramsar site[6].” The ESIA further notes that the “Potential impacts to the Murchison Falls–Albert Delta Wetland System Ramsar site were assessed to be High Adverse to Critical for all project phases⁶.”

(c) EACOP-affected wetlands: We are also concerned that the Ugandan and Tanzanian governments, TotalEnergies and CNOOC plan on constructing the EACOP through wetlands in Uganda and Tanzania. The pipeline is set to affect over 158 wetland sections in Uganda with the pipeline crossing wetlands in all the ten districts that it will traverse in Uganda. Of particular

⁴ Government of Uganda; *Uganda Wetlands Atlas Volume 2*: https://www.mwe.go.ug/sites/default/files/Uganda%20Wetlands%20Atlas%20Volume%20II_Popular%20Version.pdf

⁵ Pomeroy, D. (2020); *Waterbirds of the Murchison Falls–Albert Delta Wetland System, an important Ramsar site*: Africa Journals Online

⁶ TotalEnergies (2018); *Tilenga ESIA report*: https://corporate.totalenergies.ug/sites/g/files/wompond2271/f/atoms/files/esia_nts_tilenga_esia_28-02-19_reduced_size.pdf

concern is the fact that the pipeline if constructed, the EACOP will affect the Kibale/Bukoora, Kisoma, Kasemugiri and Jemakunya wetlands which are part of the Sango Bay-Musambwa Island-Kagera (SAMUKA) Ramsar Wetland System. The EACOP is also set to affect the Katonga wetland system, which is connected to the Nabajjuzi Ramsar Wetland. SAMUKA and Katonga are of immense socio-economic importance. SAMUKA has an economic value of USD 117 million per year (Sango Bay only) while Katonga drains into Lake Victoria, the world's second largest freshwater lake on which up to 40 million people rely to meet their water and other needs.

(d) Virunga National Park concerns: Further and as earlier indicated, the DRC government put up 27 oil and 3 gas blocks for auctioning in July 2023. Some of these blocks are located in the Virunga National Park, a Ramsar site as proclaimed in 1996. The national park, which is Africa's oldest park, is home to 218 mammal species including the mountain gorilla, 709 bird species, 109 reptile species and others. The park needs to be protected because not only is it a Ramsar site but is also home to important biodiversity.

(e) Oil spill potential: In the 2009 Environmental Sensitivity Atlas for the Albertine Graben, the Government of Uganda (GoU) recognised that oil spills could be detrimental to wetlands and other biodiversity in the Albertine Graben noting that, "wetlands and open water are delicate ecosystems and oil spreads easily and fast in case of a spill"⁷. This could see the oil-affected Ramsar sites in Uganda and the DRC being contaminated, and their ecological character changed.

(f) Economic importance of wetlands: The biodiversity found in the Tilenga- and EACOP-affected wetlands as well as Virunga National Park confer economic benefits on Ugandan, Tanzanian and Congolese populations. The Murchison Falls-Albert Delta Ramsar Wetland for instance is an important spawning ground for the Lake Albert fisheries. Lake Albert, which is shared between Uganda and the DRC employs 15,420 fishers and over 20,000 fishers in Uganda and the DRC respectively. The fisheries sectors earn the above-mentioned countries millions of dollars per year. In addition, per the Uganda Bureau of Statistics (UBOS), Lake Albert contributed 43% of Uganda's fish catch⁸ in 2018.

(g) Contribution to tourism: Further, the Tilenga- and EACOP-affected wetlands and Virunga National Park are home to species such as sitatunga, hippopotamus, crocodiles, monitor lizards, mountain gorillas and others that support the tourism industries in Uganda, Tanzania and the DRC. Notably, the tourism sectors in Uganda and Tanzania are billion-dollar industries that earned

⁷ Government of Uganda (2009); *Environmental Sensitivity Atlas for the Albertine Graben*: [https://wedocs.unep.org/bitstream/handle/20.500.11822/9216/Environmental%20Sensitivity%20Atlas%20for%20the%20Albertine%20Graben-2009Sensitivity Atlas 2009 May.pdf?sequence=3&isAllowed=y](https://wedocs.unep.org/bitstream/handle/20.500.11822/9216/Environmental%20Sensitivity%20Atlas%20for%20the%20Albertine%20Graben-2009Sensitivity%20Atlas%202009%20May.pdf?sequence=3&isAllowed=y)

⁸ Uganda Bureau of Statistics (2019); Statistical Abstract: https://www.ubos.org/wp-content/uploads/publications/01_20202019_Statistical_Abstract_Final.pdf

Uganda USD 1.047 billion (59% of all service export earnings) by February 2023⁹, Tanzania USD 2.7 billion by February 2023¹⁰ and the DRC about USD 107.70 million in 2021¹¹. The sectors also employ 1.5 million¹² as well as 307,564¹³ people in Uganda and Tanzania respectively. The economic importance of the oil-affected wetlands cannot be over-emphasized therefore.

(g) Social importance of the wetlands: Further, the people of Uganda, Kenya, Tanzania and DRC value their cultures and the EACOP-affected wetlands as well as Virunga National Park aid cultural conservation. This is because the wetlands and park are home to plant and animal species such as the sitatunga, *Ficus natalensis*, and others which are part of communities' clan systems and provide material needed to make traditional clothes.

(h) Climate stabilisation: The EACOP-affected wetlands contain peaty soils that are important for climate stabilisation. Virunga National Park also plays climate stabilisation roles. We are afraid that their potential degradation for the EACOP project and oil exploration respectively will affect the wetlands' capacity to play their climate stabilisation roles.

3. CONCLUSION & RECOMMENDATIONS

The Tilenga- and EACOP-affected wetlands as well as Virunga National Park play important biodiversity conservation, socio-economic and climate stabilisation roles. They should be conserved. Indeed, parties such as the Ugandan, Tanzanian and Congolese governments that are signatory to the Ramsar Convention “are expected to manage their Ramsar Sites so as to maintain their ecological character and retain their essential functions and values for future generations¹⁰.”

However, based on their track record that includes failing to avoid, minimise or mitigate the Tilenga, Kingfisher and EACOP oil project impacts as discussed under the introduction section of this letter, we are afraid that TotalEnergies, CNOOC and the Ugandan, Tanzanian as well as Congolese governments will not adequately manage the impacts of the above-mentioned projects and oil exploration respectively to Ramsar sites, thereby likely changing their ecological character.

⁹ State House, Uganda (2023); *State of the Nation Address 2023*: <https://statehouse.go.ug/sites/default/files/attachments/speeches/state-nation-address-1.pdf>

¹⁰ The Citizen (2023); *Tanzania's tourism earnings rebound beyond pre-pandemic*: <https://www.thecitizen.co.tz/tanzania/news/national/tanzania-s-tourism-earnings-rebound-beyond-pre-pandemic--4204662>

¹¹ World Bank; *Tourism in the Democratic Republic of Congo*: <https://www.worlddata.info/africa/congo-kinshasa/tourism.php>

¹² Uganda Bureau of Statistics (2023); *Uganda Tourism: Satellite account*: https://www.ubos.org/wpcontent/uploads/publications/03_2023Uganda_Tourism_Satellite_Account_-_Popular_Version_2023_Web.pdf

¹³ The Citizen (2022); *Renewed optimism as tourism jobs rebound*: <https://www.thecitizen.co.tz/tanzania/news/national/renewed-optimism-as-tourism-jobs-rebound-3822852>

We therefore recommend the following:

- (i) **That the Ramsar Secretariat engages the Tanzanian government** to determine the Ramsar wetlands that are set to be directly or indirectly affected by the EACOP;
- (ii) **That the Ramsar Secretariat adds the Murchison Falls-Albert Delta, SAMUKA and Nabajjuzi Ramsar sites in Uganda as well as Virunga National Park in the DRC to the Montreux Record, a record of Ramsar Sites where changes in ecological character have occurred, are occurring, or are likely to occur due to technological developments, pollution or other human interference¹⁴; and**
- (iii) **That the Ramsar Secretariat engages TotalEnergies, CNOOC and the Ugandan, Congolese** as well as Tanzanian governments to cancel any oil developments that are directly and indirectly affecting Ramsar sites in Uganda, Tanzania and the DRC.
- (iv) **That the Ramsar Secretariat engages** the DRC government to halt the bidding process for the blocks located in the Virunga National Park.

Thank you for your cooperation in this matter.

SIGNATORIES

1. Forum des Engagés pour le Développement Durable (FORED), RD Congo
2. AbibiNsroma Foundation (ANF), Ghana
3. Forum pour la Paix, l'Environnement et le Développement (FOPED), RD Congo
4. Dynamique Communautaire pour la Protection de l'Environnement dans le Rift Albertin (DYCOPERA), RD Congo
5. Réseau des Organisations pour la Conservation et la Protection de l'Environnement vironnement (REOCOPE), RD Congo
6. Congo Biodiversity Conservation Network (CBCN bureau Ituri), DRC
7. MenEngage RDC, RD Congo
8. Fédération des Jeunes Entrepreneurs de l'Est (FEJEC), DRC
9. Innovation pour le Développement et la Protection de l'Environnement (IDPE), DRC
10. Solidarité pour la Réflexion et Appui au Développement Communautaire (SORADEC), RDC
11. Ensemble pour la Justice climatique et la Protection des Défenseurs de l'Environnement, (E.J.P.D.E), RDC
12. Synergie des Vanniers et Amis de la Nature (SVAN), RDC
13. Synergie de Jeunes pour le Développement et la Défense de Droits Humains (SJDDH), RDC
14. Union de Familles pour la Recherche de la Paix, (UFAREP), RDC

¹⁴ Ramsar; *Managing Ramsar wetlands*: <https://www.ramsar.org/our-work/wetlands-international-importance/managing-ramsar-sites>

15. Synergie des Ecologistes pour la Paix et le Développement (SEPD), RDC
16. Coopérative des Apiculteurs et Vendeurs du Miel au Kivu (C.A.V.M.K), RDC
17. Ensemble pour la Justice climatique et la Protection des Défenseurs de l'Environnement, (E.J.P.D.E), RD.Congo
18. Youth for Green Communities (YGC), Uganda
19. Alerte Congolais pour l'Environnement et le Droit de l'Homme (ACEDH), RDC
20. Cadre de Concertation de la société civile de l'Ituri sur les Ressources Naturelles (CdC/RN), DRC
21. Tasha Research Institute Africa (TASHA), Uganda
22. Green conservers, Tanzania
23. Economic and Social Justice Trust of Namibia (ESJT)
24. Rassemblement des Personnes Handicapées pour le Développement intégral (RPDI), RDC
25. 350Africa.org
26. Africa Institute for Energy Governance (AFIEGO), Uganda
27. Guild Presidents' Forum on Governance(GPFOG), Uganda
28. African Institute for Climate Action and Justice (AFICAJ), Uganda
29. African Initiative On Food Security and Environment (AIFE), Uganda
30. Integrated Green Media Foundation, Uganda
31. Progressive Think Tank, Uganda
32. Alliance for Empowering Rural Communities (AERC), Ghana
33. Center for Energy and Environment Development, Ghana
34. Center for environmental research and Agriculture innovations (CERAI), Uganda
35. Voice of The Vulnerable (VOTV), Nigeria
36. Actions pour la Promotion et Protection des Peuples et Espèces Menacés en RDC (APEM-RDC)
37. Human and Environmental Development Agenda (HEDA), Nigeria
38. Fridays For Future Uganda (FFFUG)
39. Be Empowered, Uganda
40. Agali Ewamu, Uganda
41. Association des Agriculteurs sans Frontières aasf ongd, RDC
42. Extinction Rébellion université de Goma (XR UNIVERSITÉ DE GOMA), RDC
43. Appui aux Initiatives Communautaire de Conservation de l'Environnement et de Développement Durable (AICED), RD Congo
44. Hub-Mooc conservation, Burkina Faso
45. Environment Governance Institute, Uganda
46. East African Crude Oil Pipeline Host communities (EACOP HC), Uganda
47. Les Amis de la Terre-Togo
48. Justica Ambiental (JA!), Mozambique
49. Laudato Si' Movement Africa
50. Sustainable Development Institute (SDI)
51. Organisation for Community Engagement (OCE), Tanzania
52. Community Development Advocacy Foundation (CODAF)
53. Centre for Citizens Conserving Environment & Management (CECIC), Uganda
54. Strategic Response on Environmental Conservation (STREC), Uganda
55. National Association for Professional Environmentalists (NAPE)/Friends of the Uganda, Uganda
56. Oil Refinery Residents Association (ORRA), Uganda

57. Nature Talk Africa (NaTA)

58. Association Congolaise pour le Relèvement Communautaires, (ACRC), RDC

59. Actions pour la Promotion et Protection des Peuples et Espèces Menacés (APEM-RDC)

60. Regional Environmental Organization (ZERO), Zimbabwe

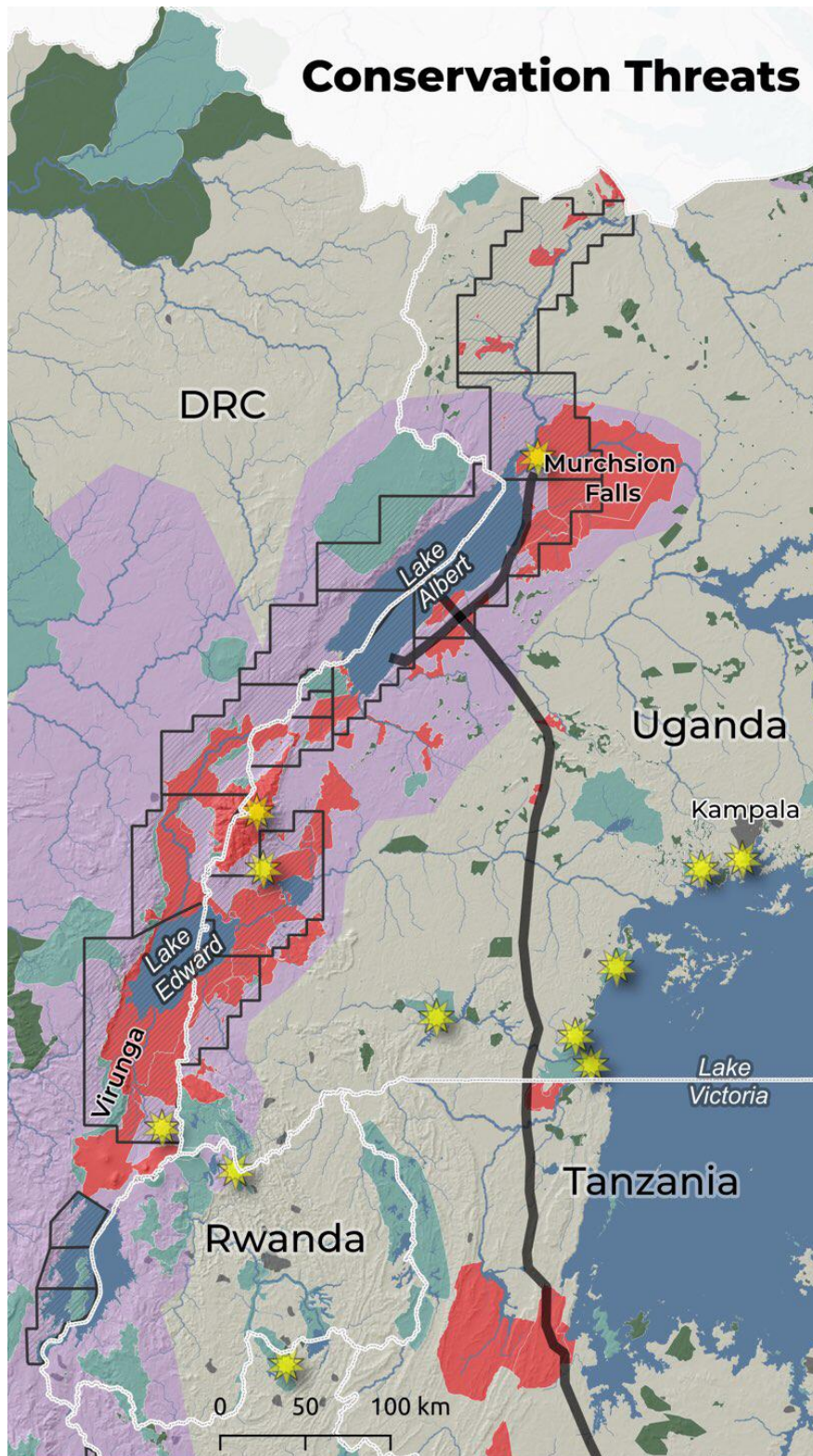
61. Initiative pour le Developpement Local, RDC

ANNEXES: MAPS SHOWING OIL THREATS TO RAMSAR SITES



A map showing the Victoria Nile Crossing (thick red line) and two wellpads under construction under the Tilenga oil project in Uganda. The Victoria Nile Crossing and wellpads are crossing or are too close to the Murchison Falls-Albert Delta Ramsar Wetland, raising concerns.

Conservation Threats



Data: World Database of Protected Areas: UNEP-WCMC, 2023;

The EACOP (thick black line) also endangers Virunga National Park, a Ramsar Wetland, as it makes oil exploitation in the DRC more economically viable.

