



Extortion, Coercion, and Impoverishment

Human Rights Abuses and Governance Failures in the China National Offshore Oil Corporation's (CNOOC) Kingfisher Oil and Gas Project

SEPTEMBER 2025



Cover photo: Kingfisher Infrastructure © Samuel Okulony, EGI

Summary

“If you don’t pay, they’ll take your boat, and that’s your whole life gone.”

– Local fisherman

“There’s no signpost, no notice, but if you’re outside past six, they’ll arrest you or beat you.”

– Shopkeeper in Kiina

“We know the water is not clean, but we have no choice. This lake is all we have.”

– Female resident

In September 2024, Climate Rights International (CRI) published “They Don’t Want People to Stay Here”, which documented how Uganda’s Kingfisher oil and gas project, operated by the China National Offshore Oil Corporation (CNOOC) Uganda Ltd., (hereafter referred to as CNOOC) has resulted in forced evictions; inadequate or non-existent compensation for land and other assets; coercion and intimidation in the land acquisition process; loss of livelihoods; reduced standards of living and impoverishment; labor rights violations; and sexual and gender-based violence.

A month later, in October 2024, a report by the Environment Governance Institute Uganda (EGI) documented socio-economic marginalization, eroded trust in state institutions, and additional examples of gender-based violence.

Now, a follow-up report by EGI and CRI has documented a series of new abuses. State security forces maintain militarized control over affected villages in the Kingfisher area. Access to the area is restricted by armed checkpoints. Residents face unannounced evening curfews. Land grabs continue through a company-aligned land association, bypassing customary landholder consent, often enforced by military force without compensation to those evicted. Fishing communities are strangled by extortion of unreceipted “fees” every two weeks, arbitrary boat seizures, and more fees to recover seized boats. Women fish traders face routine harassment and confiscation of goods. A new metallic barricade blocks critical fishing grounds and breeding habitats. Sexual exploitation persists, while teenage pregnancy rates in villages adjacent to the oil operations have reportedly increased.

In short, the Ugandan government’s oil dream has promised national wealth but is delivering poverty, repression, and environmental harm, while those responsible evade accountability and communities are left with little but broken promises.



*A woman carrying water fetched from the lake in the Kingfisher area.
© Samuel Okulony, EGI*

Uganda's oil and gas development is centered around three major projects: Kingfisher, the larger Tilenga project, and the East African Crude Oil Pipeline (EACOP). Both the Kingfisher project and the larger Tilenga project are jointly owned by TotalEnergies, which has a 56.67 percent stake; CNOOC, with 28.33 percent; and the Uganda National Oil Company (UNOC), at 15 percent. The Tilenga project is operated by TotalEnergies EP Uganda (hereafter referred to as TotalEnergies), a subsidiary of the French multinational TotalEnergies. TotalEnergies and CNOOC are two of the world's largest oil and gas companies.

EACOP, if finished, will be a 1,443-kilometer heated pipeline—the world's longest—to transport crude oil from Hoima in western Uganda to the Tanzanian port of Tanga. It is being developed by a consortium comprising TotalEnergies, CNOOC, UNOC, and the Tanzania Petroleum Development Corporation (TPDC). Uganda's oil and gas sector, once hailed as a transformative opportunity for national development, has instead become mired in rights abuses, delays, controversy, and intensifying community opposition and grievances. Initially

projected to commence production in the mid-2020s, Uganda's oil development projects are now expected to yield first oil no earlier than 2027. This shift reflects not only technical and logistical hurdles, but also persistent social, governance, and human rights concerns which have contributed to difficulties in finding finance and insurance.

The entire project will be a disaster for climate change. An analysis by the Climate Accountability Institute concluded that the entire oil and gas project would produce around 379 million tons of carbon dioxide emissions over 25 years. Peak annual emissions would be more than double the current annual emissions of Uganda and Tanzania combined. Like all new oil and gas projects, its development is incompatible with the Paris Agreement's 1.5C° warming target and a livable planet.

The allegations in this report related to the Kingfisher project raise serious concerns about the practices of CNOOC and its subcontractors, as well as their compliance with Ugandan and international law, International Finance Corporation (IFC) performance standards, and the commitments that CNOOC and its partners have made. They also raise serious concerns about the actions of the Ugandan military and the impunity with which it continues to act.

Despite repeated assurances from government agencies, CNOOC, and TotalEnergies, affected communities remain excluded from decision-making processes and continue to face displacement, insecurity, and deepening poverty. Indeed, rather than moving toward inclusive development, Kingfisher has widened inequality, undermined food security, and deepened the climate crisis through environmental destruction and fossil fuel dependence.

Key Recommendations

Uganda's oil development is perpetuating climate, environmental, and human rights harms in violation of both national and international law and should be discontinued. Until it is discontinued, we recommend that:

- The Ugandan government, Ugandan military, CNOOC, and its subcontractors must immediately cease all human rights abuses and environmental harms.
- All allegations of human rights violations must be thoroughly and independently investigated by the Ugandan government, CNOOC, TotalEnergies, and UNOC.

- All perpetrators, including in the government, military, police, and companies, should be held accountable through an independent and transparent legal and judicial process.
- The government, CNOOC, and other owners of Kingfisher should ensure that all affected persons and communities receive full compensation for all losses, including land, homes, boats and other assets, and income, as well as material and other assistance to fully restore their livelihoods.
- Financial institutions and insurance companies should follow the lead of major financiers and insurers from North America, Europe, and Japan and refuse to provide further support for Kingfisher and other parts of the wider oil project.

A full set of recommendations can be found at the end of the report.



Feeder pipelines laid along the route from Kingfisher to Kabaale, where they will connect to the EACOP. © Samuel Okulony, EGI

Methodology

In June 2025, EGI conducted a follow-up field assessment to evaluate the implementation of earlier recommendations related to the Kingfisher oil development project. This visit sought to understand evolving community perceptions, document ongoing human rights concerns, and assess progress on commitments made by the Ugandan government, CNOOC, its subcontractors, and other actors to address abuses, including sexual and gender-based violence.

EGL also visited the area to establish deeper and more regular community engagements with these very isolated communities. EGL spoke to 25 people, including fishers, traders, youth, community organizations, members of security forces and others. All interviewees provided informed consent to participate in the interview. In some cases, we have given pseudonyms and withheld identifying information of interviewees to protect their identity because of the risk of retaliation. No financial incentives were provided to interviewees. This briefing summarizes the concerns reported to EGL by the community and underscores the need for more thorough investigations into those concerns.

I. Restricted Access and Curfews

Despite reported claims by CNOOC officials of improved transparency and community engagement, access to the villages near the Kingfisher project site remains tightly controlled. Entry into the area, including Nsonga, Nsuzu A, Nsuzu B, Kiina, and other surrounding villages, is at the whim of security forces.

After the publication of the CRI and EGL reports, in November 2024, the Uganda Peoples' Defence Forces (UPDF) commander for the area was replaced with Commander Mubingwa Moses. The community has reported fewer cases of serious harassment under the new security commander. Residents reported that he is more approachable and engaged with the community than his predecessors. Nevertheless, the underlying structure of control remains unchanged. The visible and militarized security presence continues to instill fear and limit community mobility in the area. All visitors still must explain their reasons for accessing the area. Community members are required to obtain permission to access Lake Albert for activities that before oil development commenced were part of their routine economic and cultural lives.

Access to the area is restricted by three layers of security: the Counter-Terrorism Police, the regular Traffic Police, and joint UPDF and Saracen Private Security Company patrols. All three conduct vehicle searches and operate roadblocks at key entry points into the area, as well as at irregular checkpoints. For a population whose daily livelihoods depend on access to fishing areas, farms, and markets, continuing to experience controlled access poses a serious infringement on their rights to freedom of movement, privacy, and livelihoods.

Residents continue to report significant restrictions on freedom of movement, particularly in the evenings. According to multiple community testimonies collected, a de facto curfew has been imposed by the UPDF in the village of Kiina,

with residents discouraged or outright prevented from moving freely after 6:00 p.m. In other locations similar curfews exist, restricting freedom of movement starting at 6:30 p.m. or 7:00 p.m.

These restrictions have not been officially announced through any formal communication from the government, security forces, or the oil companies. Nonetheless, UPDF patrol the area and enforce the evening limitations with arbitrary arrests and use of physical violence. One shopkeeper in Kiina said:

“There’s no signpost, no notice, but if you’re outside past six, they’ll arrest you or beat you. Many of us have suffered.”

According to those interviewed, the justification provided by security personnel is that evening movements near the oil well pads pose a potential threat to oil infrastructure, reflecting an implicit assumption that locals are security risks in their own communities. This stigmatization and the securitization of daily life have led to a climate of fear and mistrust between security forces and community members.

The repercussions of these curfews on livelihoods are severe. Small-scale businesses, such as shops, food vendors, and market stalls, have been forced to shut down early, resulting in significant losses of income for households already living in precarious economic conditions. The sudden loss of evening trade has deepened poverty and limited livelihoods, especially for women and youth who rely on informal work such as at bars and restaurants, and as commercial motorcycle taxi drivers (commonly referred to as *boda bodas*) for daily survival.

Moreover, traditional and cultural ceremonies, such as funerals, weddings, and community gatherings and often take place in the evening or late into the night, have been severely disrupted. Community members noted that elders now avoid organizing or attending such events due to fear of confrontation with security forces.

II. Livelihoods Decimated: Harassment, Extortion, and Restrictions on Fishing and Fish Trading

Extortion, harassment, blocked fishing grounds, and polluted waters have combined to make it nearly impossible for many in Lake Albert communities adjacent to Kingfisher to sustain a fishing livelihood. Security restrictions, extortion, and environmental damage are pushing some fishers and their families

out of the trade entirely, deepening poverty and eroding a generations-old way of life.

Extortion and targeting of fishers

In the past year, fishing communities along Lake Albert's shore have experienced both relief and repression. As previously documented by EGI and CRI, fishing activities in the Kingfisher area have been severely restricted since oil operations began. Under the new local commander some of these restrictions have been eased, while boat burning has ceased.

Local community members attribute this to the public outcry after strong evidence of boat burning. However, this allowance comes with a price: since September 2024 an unofficial payment of 200,000 UGX (USD 57) is required to be paid every two weeks to the UPDF for a fisher to be permitted to operate in the area. This payment is neither formalized nor receipted. Community members stated that names and boat details are manually recorded in a basic exercise book by security operatives in UPDF uniforms. Anyone found fishing without paying the fee faces arrest and their boat is confiscated. Retrieving a confiscated boat costs approximately 1,000,000 UGX (USD 285), an amount that most of the impoverished households whose entire income is dependent on the daily catch cannot afford. As one local fisher shared:

"We all know it's illegal, but the punishment is too heavy. If you don't pay, they'll take your boat, and that's your whole life gone. So, we pay even if we hate it."

Another local fisher who refused to pay the fee recounts:

"My boats have continuously been seized by the army. I have now resorted to selling firewood, which earns me less money than I used to get in fishing."

Five fishers who failed to pay the fee to retrieve their boats described having their boats damaged, with security forces removing pieces of wood from their boats for use in cooking at the military barracks.

In addition to boat confiscation, six people described being arrested for fishing without authorization or for fishing within a five-kilometer radius of the oil installations. They were held for several days until family members were able to

mobilize at least 200,000 UGX (USD 57) to pay the UPDF to secure their release. The sources say that the money was not receipted.

This punitive system of extortion has placed immense psychological and economic pressure on fishing households, many of whom already face high levels of poverty and displacement. Before the restrictions on fishing were first imposed in 2022 by the UPDF, a family would earn an average of 450,000 UGX (USD 128) per week according to community residents, which was sufficient to meet basic household needs.

Many women and youth in the community rely on the fish trade for survival and face their own set of challenges. The traders told EGI they face a notorious informal checkpoint at the top of the escarpment near the Uganda Revenue Authority (URA) offices. At this spot, UPDF's marine unit routinely stops traders and inspects their goods. If they are found with fish, the quantity is assessed arbitrarily, and they are compelled to pay unreceipted fees to pass. The fee amounts vary depending on the load but are typically unaffordable for small-scale traders. Failure to pay results in immediate confiscation of the fish, undermining their ability to earn income and feed their families. In many instances, this harassment has discouraged women from participating in the fish trade altogether, thus exacerbating gender inequality and economic exclusion.



Kingfisher well pad and the barricade that affects shorelines and breeding grounds for fish. © Samuel Okulony, EGI

Environmental and Livelihood Impacts of the Well Pad Boundary Wall

During the field visit to the Kingfisher oil project site, EGI observed the construction of a metallic boundary barricade in the vicinity of oil infrastructure along Lake Albert's shoreline. According to community members and public documentation, CNOOC had applied for and received approval from the National Environment Management Authority (NEMA) for permission to erect this wall to safeguard oil infrastructure from rising water levels. All three well pads are constructed immediately adjacent to the shoreline, with drill rigs inexplicably as close as 50 meters to the shoreline and drilling fluid sumps as close as 20 meters from the shoreline. This location increases the risk of contamination of adjacent waterbodies.

While the wall is a reasonable solution to the risk of rising water levels to oil infrastructure and to the lake from additional contamination, its erection has had negative consequences for the local ecosystem and fishing-dependent livelihoods. The barricade consists of high-grade metal sheets reinforced with stone foundations submerged in the lake, cutting off sections of the shallow shoreline from public access. According to local fishers, this area also serves as a critical breeding ground for fish, including Silverfish (locally known as *mukene*), which are vital to the nutrition and income of surrounding communities.

The barricade can also pose a safety hazard during periods of strong winds or emergency situations on the lake. The wall reduces the number of accessible shoreline entry and exit points, making it difficult for fishers to quickly dock or seek refuge during dangerous conditions.



Youth packing silver fish in Nzunzu B © Samuel Okulony, EGI

Water Pollution and Public Health Concerns

Claims by local residents of increasing water pollution along the Lake Albert shoreline, particularly in areas adjacent to oil installations operated by CNOOC need to be urgently investigated. Community members insist that pollution has worsened since construction and drilling activities intensified, citing increased sediment runoff, potential chemical leaks, and destruction of vegetation along the shoreline. While we are unable to independently verify community claims attributing the contamination directly to oil-related activities, the degradation of water quality was visible, as the water appeared significantly more turbid and discolored near project infrastructure compared to other, less industrialized parts of the lake.



Kingfisher well pad and the barricade that affects shorelines and breeding grounds for fish. © Samuel Okulony, EGI (blur added for privacy)

A contributing factor mentioned by local residents is the clearing of natural vegetation to facilitate project works and poor management of waste from the plant. The clearing of vegetation has increased stormwater runoff and rates of erosion, increasing the likelihood of construction debris and possible oil and chemical residues flowing into the lake during rainfall.

The same potentially contaminated water is used for both human and animal consumption. Women were observed collecting water directly from the lake for cooking, washing, and drinking. In interviews, one woman noted:

“We know the water is not clean, but we have no choice. This lake is all we have.”

One of the residents at the shore explained her concerns about the quality of the other available water in the area:

“Once in a while the community goes to the water pump station at the company to collect water for drinking. We are not even sure if it’s treated. This is done just periodically. Sometimes we are pushed to go in some local streams in Nsonga and draw water, and we try to use Water Guard [chemical water treatment]. However, the cost of buying Water Guard as locals in the community is high.”

A primary teacher said:

“Our children risk suffering from waterborne illness, and some come to school with rashes on their skin.”

III. Ongoing Land Acquisition and Forced Evictions in Kingfisher

Community grievances related to land acquisition remain one of the most contentious and unresolved issues in the Kingfisher project zone. Despite repeated commitments to transparency and fair compensation by CNOOC, local residents continue to experience forced evictions, non-consensual land takeovers, and exclusion from decision-making processes.

As part of ongoing oil infrastructure expansion such as feeder pipelines, access roads, and auxiliary installations, CNOOC has increasingly demanded more land. Rather than engaging directly with legitimate land users or families with customary ownership, the company channels its transactions through the Buhuka Communal Land Association (BUCOLA), an entity it helped establish to aggregate community land into one consolidated title.¹ In September 2024, CRI

¹ For more information on BUCOLA, please see Chapter 7 of CRI’s September 2024 report: “They Don’t Want People to Stay Here” <https://cri.org/reports/they-dont-want-people-to-stay-here/>

documented numerous cases of CNOOC acquiring land through BUCOLA rather than consulting with and compensating individual households. None of the communal-land residents interviewed by CRI reported receiving compensation for homes, crops, or other assets. People said CNOOC dealt only with BUCOLA and any payments went to the association, not families.



CNOOC markstone marking land earmarked for acquisition. © Samuel Okulony, EGI

During EGI's June field visit, residents continued to allege that CNOOC and BUCOLA collude, effectively bypassing the agreement of affected customary landholders or land users. Whenever new land is needed for infrastructure expansion, CNOOC consults only with BUCOLA representatives.

Area residents say that BUCOLA does not reflect the will or interests of the wider community and is an institution over which they say they have no control, legal recourse, and which does not typically respond to their concerns. As one affected resident explained:

"They never come to us. They just go to BUCOLA and claim they've got permission. Then one day, the military shows up, and we are told to vacate [without compensation]."

While it is unclear how much, if any, compensation CNOOC has paid to BUCOLA to acquire land, none of those interviewed who had been residing on communal

land said they had received compensation for their land, houses, livestock, or other assets from CNOOC or BUCOLA.

Those who attempt to resist evictions are reportedly met with military force. According to multiple testimonies, the presence of armed personnel during land takeovers has become normalized.

Although Uganda law requires compensation for displaced individuals, CNOOC typically directs such disputes to BUCOLA for further resolution. In several documented cases, families have been displaced without any form of compensation, and their complaints were redirected back to BUCOLA. One resident described being told to leave the area because it was needed for road construction. He asked to be shown where he could build a house even if they weren't willing to compensate him for the land on which he had been living. He was told to go and ask BUCOLA, even though no BUCOLA representatives are present in his community. When he refused to leave, UPDF came and pressured him to leave.



A CNOOC markstone of land recently acquired. © Samuel Okulony, EGI

CNOOC has never published a Resettlement Action Plan (RAP) that would outline compensation requirements and livelihood restoration plans, despite requirements to do so under Ugandan and international standards, and repeated requests to Ugandan authorities by EGI and other Ugandan NGOs under Uganda's Access to Information laws.

This lack of transparency is in stark contrast to the RAPs that are available for the Tilenga and EACOP pipeline projects, which are majority owned and

operated by TotalEnergies, and in which CNOOC has an equity stake. CNOOC has also committed to developing an accessible grievance redress mechanism for community members, but no one interviewed was aware of the existence of any such mechanism.

IV. Sexual and Gender Based Exploitation

Community members told EGI that reports of sexual exploitation and abuse by the military have declined slightly compared to the previous year, largely attributed to the arrival of a new commander. But they said that sexual exploitation continues to be a threat to their communities and has contributed to tensions between CNOOC, foreign oil company workers, and youth (as well as various broken promises related to employment).

Many described a high-profile incident that occurred in February 2025 in which a CNOOC employee was allegedly found sexually assaulting a 16-year-old girl inside her parents' house in Nsonga village. Outraged locals attacked the man, throwing stones at him. UPDF soldiers intervened and took the man to Nsonga Police Station. When the mother followed up several weeks later, she was told the case had been transferred to the Kikuube police station in Kikuube district for investigation. It is not clear what has happened since. Community members told EGI that the person in question is no longer seen in the area, and they assumed he had been transferred out of the area by CNOOC.

As more community members face displacement and restrictions on their livelihoods, poverty is becoming more deep-rooted. With increasingly limited access to formal employment or income-generating opportunities, community members say that some women and girls have turned to sex work as a survival strategy. While exact numbers remain unclear, community members claim that workers and military personnel form a significant portion of the clientele.

This dynamic reflects a power imbalance rooted in economic desperation and structural inequality and reinforces a cycle of exploitation that leaves young women at risk of sexually transmitted infections, early pregnancies, and social exclusion. According to community residents, the rate of teenage pregnancies in the seven villages closest to the oil development has increased significantly in the last year. In Nsonga and Nsuzu B, residents reported that over 30 girls under the age of 18 were currently pregnant, which they say is a significant increase in the last year. This places an immense burden on already strained local health services and risks exposing these girls to long-term physical and psychological

trauma. According to an education official, this is leading to more girls dropping out of school.

An elderly woman interviewed in Nsuzu said that:

“More than half of the young girls who get pregnant here end up delivering through cesarean section because their bodies are not developed enough for childbirth.”

Despite these reports, the field team did not observe any evidence of sexual and reproductive health awareness campaigns or interventions aimed at preventing sexual and gender-based violence (SGBV). Schools, health centers, and community spaces lack information on child protection, family planning, or access to safe reporting channels.

CNOOC committed in its Environmental and Social Impact Assessment (ESIA) to carry out information, education, and communication campaigns to “increase awareness and reduce communicable disease risks.” The ESIA also recognized the risks of increased SGBV and sexual exploitation linked to the influx of workers into project areas, committing to codes of conduct for staff and subcontractors, awareness programs, and grievance redress mechanisms.

V. Education: A Struggling System Amid Economic Hardship

Education in the Kingfisher area continues to be dire. During the June 2025 field assessment, EGI found that while school enrollment had increased from the previous year from 130 pupils to over 200 in one particular school, the number of children in school remains significantly lower than the actual school-age population in the area. At the time of EGI’s visit the headteacher said:

“Over 40% of pupils had been sent home due to unpaid school fees and we are not sure if some may come back.”

While there are long-standing factors that limit school enrolment, teachers and parents cited growing poverty and the restricted access to livelihood resources brought about by the oil project, particularly limitations on fishing, as the primary barriers to payment of school fees leading to inconsistent school attendance. As one parent lamented:

"We want our children to study, but if there's no food at home or money for books, how do we send them?"

Another parent pointed out:

"If your boat is confiscated, you don't have any means of getting money."

The economic situation has disproportionately affected girls, many of whom drop out early, due to a myriad of factors, including pregnancy, and pressure to engage in household labor or otherwise help earn money for their families.

CNOOC has made commitments through its ESIA and Environmental and Social Management Plan (ESMP) to strengthen education in math and science, develop science laboratories, and offer various scholarships.

VI. Health: Understaffed, Underequipped, and Out of Reach

The health care system in the Kingfisher area remains dire. The only public health facility available to the local population is "Health Centre II," which serves several villages around the Kingfisher project site. Its ability to deliver even the most basic services is severely limited. With only a handful of health workers and frequent lack of drug supplies, patients are often told to purchase medicines privately. Pregnant women, children, and the chronically ill who require more advanced care must travel up the escarpment to better-equipped facilities several kilometers away, a journey especially dangerous for women in labor or patients needing urgent treatment. One community health volunteer explained that:

"By the time someone gets to the top of the escarpment, they might not even survive. And that's if they can afford transport."

While responsibility lies mainly with government, the oil project expands health risks in the area, including workplace accidents, road traffic injuries, and the spread of HIV. The influx of workers and job seekers also adds pressure to already overstretched health services.

In its Environmental and Social Management Plans, CNOOC committed to strengthening the local health system, including upgrading health facilities,

donating medicines and equipment, training health workers, and supporting referral linkages in coordination with district authorities. While the company has highlighted some donations, such as equipment and medicines and ambulances, there is little evidence that these broader commitments have been implemented in a sustained or systematic way. One year on, local health centers remain severely under-resourced, with few meaningful improvements visible to communities. Without real investment in the promised measures, the project risks worsening the vulnerabilities of local communities rather than alleviating them.

VII. Recommendations

- **Suspend Oil Operations and Commission an Independent Investigation:** The Government of Uganda should immediately suspend all ongoing oil operations in the Kingfisher development area and commission a credible, independent investigation into the documented human rights violations, environmental degradation, and socio-economic impacts. The process must be transparent, participatory, and led by impartial experts in collaboration with affected communities and civil society. The findings should inform legal action, institutional reforms, and mechanisms for accountability.
- **Ensure Reparations and Corporate Accountability:** Following the investigation, oil companies must be held fully accountable for the harm caused and required to provide comprehensive reparations including financial compensation, livelihood restoration, and psychosocial support to all affected individuals and communities. Reparations must be implemented in a timely, transparent, and victim-centered manner, with robust oversight by independent institutions.
- **Support a Just Transition to Community-Led Green Energy:** The Government of Uganda should also halt further fossil fuel expansion and adopt a national energy strategy centered on equitable, community-driven renewable energy development. This shift should focus on meeting domestic energy needs, promoting sustainable livelihoods, and preventing long-term economic and environmental harm.
- **No Financial Support for Oil Infrastructure:** Financial institutions and insurance companies should follow the lead of major financiers and insurers from North America, Europe, and Japan that have already ruled out support for Kingfisher, EACOP and other parts of the wider oil project.

- **Zero Tolerance:** CNOOC shall issue clear and public statements of zero tolerance for human rights abuses, threats, corruption, and intimidation by staff, agents, contractors, and subcontractors. Communicate these messages publicly, including to the Ugandan government and security forces.
- **Compliance:** Ensure all company policies and practices, including those of partners and contractors, including security contractors, comply with their respective responsibilities under:
 - a. Ugandan law;
 - b. The United Nations Guiding Principles on Business and Human Rights;
 - c. International Finance Corporation Performance Standards; and
 - d. International human rights law.
- **Compensation:** The government, CNOOC, and other owners of Kingfisher should ensure that all affected persons and communities, including those living on communal land, receive full compensation for land and assets, and assistance to fully restore their livelihoods. CNOOC's Resettlement Action Plans for the Kingfisher area should be made publicly available in the languages of the impacted communities. They should:
 - a. Ensure compensation amounts are in line with international human rights standards and best practices for land acquisition.
 - b. Review past compensation practices to ensure that amounts paid reflect the cost to replace land at the time compensation was paid and promptly provide supplemental compensation to reflect changes in replacement cost.
 - c. Commission a formal review of past and current compensation practices and promptly publish the results of this review.
 - d. Ensure that payments to BUCOLA reach community members. When BUCOLA fails to pay compensation, provide compensation directly to ensure that displaced persons receive adequate compensation so that their standard of living is at least equivalent to that which they previously had.
 - e. Take all necessary measures to prevent employees, agents or, subcontractors from using any form of intimidation to coerce individuals into signing documents related to land, including, but not limited to, assertions that their land will be taken without any

compensation if they do not sign or express or implied threats of inappropriate legal action.

- **Accessible and Effective Grievance Procedures:** CNOOC shall ensure safe avenues for victims to report and file complaints with companies concerning human rights abuses associated with their operations. CNOOC shall ensure procedures for reporting grievances are communicated clearly in languages understood by affected persons and communities. CNOOC shall ensure that grievance procedures are accessible to all by broadening the locations and ways in which grievances can be filed. Appoint an independent third party to oversee the grievance process, as recommended in the Kingfisher ESIA.
- **Education and Health Services:** CNOOC shall follow through with its commitments to improve health and education services in the area surrounding Kingfisher as in its public statements, ESIA, ESMP, and other project planning documents.