

To:

Public financial institutions: Export Import Bank of the United States (US EXIM); Japan Bank for International Cooperation (JBIC); Export-Import Bank of Thailand (Thai Exim); Servizi Assicurativi del Commercio Estero (SACE); Nippon Export and Investment Insurance (NEXI); Export Credit Insurance Corporation of South Africa (ECIC); Cassa Depositi e Prestiti; African Development Bank (AfDB); African Export Import Bank; Development Bank of Southern Africa; Industrial Development Corporation of South Africa; Korea Development Bank; Export Import Bank of Korea (KEXIM).

Private financial institutions: Société Générale; Crédit Agricole; Mizuho Bank; JP Morgan; Standard Chartered Bank; MUFG Bank; Sumitomo Mitsui Banking Corporation; Sumitomo Mitsui Trust Bank; SBI Shinsei Bank; Nippon Life Insurance; ABSA Bank; Nedbank; Rand Merchant Bank; Standard Bank; ICBC.

Maputo, December 17 2025

We write to you following our previous correspondence¹ regarding the allegations of grave human rights violations, environmental damage and socio-economic issues associated with TotalEnergies' Mozambique LNG project. **The withdrawal of both UKEF and Atradius DSB from the project's financing marks a significant turning point.** These withdrawals, based on updated risk assessments and new evidence, underscore the serious and substantial concerns that civil society has raised for years. In light of this shift, we believe **the moment has come for all remaining financiers to reassess their involvement and take the responsible step of exiting the project.**

The UK Export Finance (UKEF) decision, made *"based on a comprehensive assessment of the project and the interests of UK taxpayers"*, explicitly recognised that **risks have increased dramatically since 2020.**² The Dutch Ministry of Finance similarly announced that TotalEnergies has withdrawn from its arrangements with Atradius DSB. These decisions follow over a year of investigations by Dutch, UK, and Mozambican institutions into allegations of human rights violations, and two separate legal cases against TotalEnergies in France.

The project operates in a context of violent regional conflict³.

Human Rights Violations: Evidence too serious to ignore

The withdrawal of Atradius DSB from the project followed an in-depth investigation conducted by the Netherlands Institute for International Relations (Clingendael)⁴ and a security assessment by Pangea Risk, both commissioned by the Dutch Government. The resulting report was made public on 01 December 2025, on the day the withdrawal was

¹ [Letter of 19 December 2024](#); [Letter of 16 November 2023](#)

² UK Parliament, 01 December 2025, [Written questions, answers and statements - UK Parliament](#)

³ UNHCR, 02 December 2025, [UNHCR: Nearly 100,000 displaced in recent weeks as violence spreads across northern Mozambique](#); Please see [Mozambique Conflict Monitor](#) for frequent updates on regional security in the north of Mozambique.

⁴ Clingendael, 01 December 2025, [Human rights violations by Mozambican security forces in the context of the Mozambique LNG project | Clingendael](#)

announced. Clingendael's report is based on **"more than 80 in-person interviews and conversations with various stakeholders** with direct knowledge of developments in the area (...). The sources were approached and consulted **independently from both the Politico investigation and the LNG project**, in order to ensure an independent assessment of the developments on the ground" (Clingendael, p.2).

At a time when leading public financiers are withdrawing from TotalEnergies' Mozambique LNG project, which is also coming under judicial scrutiny, we consider it important to draw your attention to the report's findings and the related alleged violations.

While confirming the specific details of the events described by the Politico article "All Must Be Beheaded"⁵ lies beyond the scope of the report, the research conducted concludes that **"the Mozambican Defense and Security Forces (FDS) have a troubled record of human rights violations in the region surrounding the LNG project's site in Afungi"**(Clingendael, p.1). More specifically, the report claims that it **"corroborates that a large number of civilians were detained and abused by FDS elements in front of the LNG project's site"** (Clingendael, p.27). This assessment is "based on the accounts of four different local sources with knowledge of the events (consulted independently from the Politico investigation and from each other), corroborated by conversations with other local stakeholders with indirect knowledge of the events" (Clingendael, p.2).

According to the report, Clingendael received testimonies regarding alleged:

- Arbitrary arrests, extortion, and violent treatment by soldiers in Palma's coastal villages: *"In Palma's coastal villages (such as Maganja and Quelimane), residents recounted numerous stories of arbitrary arrests, extortion, and violent treatment by soldiers. Local businesspeople and workers reported being harassed, forced to show documents at gunpoint, and beaten if they refused to hand over money. Detention often followed resistance. Some people were reported to have been killed for violating curfews."* (Clingendael, p.11)
- Sexual violence, physical assaults, and executions: *"Additional reports included incidents of sexual violence, physical assaults, executions, and arbitrary restrictions (for instance, people were prevented from accessing the sea or their farmland in order to support themselves, or even from going to nearby bush", "Local sources also accuse soldiers of engaging in assaults, sexual violence, and killings."* (Clingendael, p.16, 18, 19).
- Soldiers looting property and stealing: *"Military personnel were reported to be actively involved in looting. Media reports confirmed soldiers' participation in the looting of commercial banks in Palma. Eyewitnesses also observed FADM members stealing from hotels, private homes, and private companies' offices."* (Clingendael, p.17).
- **The use of container facilities to detain dozens of civilians.** Described in the following excerpt from the report:

⁵ Politico, 26 September 2024. "[All must be beheaded": Allegations of atrocities at French energy giant's African stronghold](#)".

*“According to testimonies from the sources consulted for this research, amidst high-intensity fighting in the area around Afungi in June 2021, villagers fled to nearby farmlands. Civilians were told by the FDS to gather at the Patacua barracks to avoid being mistaken for insurgents. Hundreds complied, but upon arrival, they were separated by gender, searched, and had their money, phones, and valuables confiscated. Those with scars, burns, or marks suggesting the carrying of weapons or exposure to explosives were beaten and loaded into military vehicles. A survivor testified that they were taken to the Afungi crossroads, locally known as Quatro Caminhos (“Four Ways”). **Two shipping containers held approximately 180 people, a large number of them from Monjane and Patacua.** Most were men, although there were also elderly men and a pregnant woman, who gave birth in front of the containers. **Initially, detainees were locked inside without food or water (...) for three months detainees endured physical abuse.** Blindfolded and beaten outside the containers, they were interrogated in Portuguese, a language many did not understand (...) When Rwandan troops started circulating more intensively in this area, the Mozambican military reportedly ordered the prisoners to hide. **According to the survivor, of the original 180, only 26 survived.**” (Clingendael, pp.27, 28).*

The Clingendael report states that *“the prevention of future human rights violations hinges on securing accountability for past violations”* and that the level of intimidation means abuses are likely under-reported.

Civil society organisations have called for an independent international investigation that will ensure justice for the victims and safety for the survivors, witnesses and their families.⁶

Regarding the allegations of human rights abuses by members of the Mozambican Defence and Security Forces in the report, TotalEnergies reiterates the clarifications made by the company on 20th November 2025⁷ and refers to their dedicated webpage.⁸ TotalEnergies strongly and categorically rejects allegations that Mozambique LNG or the company had, or could have had, any knowledge of the acts of violence reported in the Politico article.

Legal Exposure for Financiers

On November 18th, a criminal complaint was filed with the French National Anti-Terrorism Prosecutor (PNAT) accusing the company of complicity in war crimes, torture, and enforced disappearances.⁹ The oil and gas major is accused of having directly financed and materially supported the Joint Task Force (JTF), which, between July and September 2021, allegedly detained, tortured and killed civilians on TotalEnergies’ gas site.

This new complaint relies on internal TotalEnergies documents addressed to public financiers of the project - Cassa Depositi e Prestiti and ADSB - and obtained through

⁶ [Mozambique LNG: Financial institutions so far refrain from taking a stance on allegations of severe human rights violations - StopMozGas](#)

⁷ [Mozambique LNG: Clarification by TotalEnergies on Financing of the Project | TotalEnergies.com](#)

⁸ TotalEnergies, [Chronology of exchanges between TotalEnergies and media about Mozambique LNG](#), accessed December 2025

⁹ ECCHR, 18 November 2025, [TotalEnergies faces criminal complaint for complicity in war crimes, torture and enforced disappearance in Mozambique](#)

freedom of information requests. They detail acts of violence against civilians committed by Mozambican armed forces from May 2020 and reveal that the company was aware of serious human rights violations carried out by the JTF in close proximity to its facility. The documents show that TotalEnergies continued to directly support the JTF by providing accommodation, food, equipment, and soldier bonuses - while stipulating that bonuses would be withdrawn if soldiers committed human rights violations.

One of these TotalEnergies reports refers to “troops who were allegedly involved in a [human rights] case in August [2021].” These were deemed so serious that TotalEnergies suspended bonuses to all 1,000 JTF soldiers and the army expelled 200 from the region, according to the internal document.¹⁰

TotalEnergies rejects these accusations.¹¹

In a separate case, in March this year, French prosecutors opened an investigation into TotalEnergies for involuntary manslaughter and failure to assist persons in danger.¹² It follows a criminal complaint filed in 2023 by survivors and relatives of victims of the March and April 2021 Palma attack, in which TotalEnergies is accused of failing to ensure the safety of its subcontractors who were targeted, and some of them were killed. The investigating judge now has extensive powers and may decide to charge TotalEnergies or some of its staff if there is serious or corroborating evidence that they have committed the acts of which they are accused of by the civil parties. TotalEnergies also rejects these accusations¹³.

Any financier continuing to support operations under these conditions must **consider the growing risk of being associated politically, reputationally, or legally with a project under active criminal scrutiny.**

Long-term security risks

The letter of the Dutch Finance Minister to the Dutch House of Representatives¹⁴ also refers to the security assessment carried out by security consultant firm Pangea-Risk,¹⁵ and concludes that this report “*paints a twofold picture*”:

- i) In the short term (12-24 months), the situation is sufficiently safe due to the presence of the Rwandan army.*
- ii) In the longer term, however, systemic vulnerabilities remain: there are no long-term guarantees for the continued presence of the Rwandan army throughout the entire period,*

¹⁰ Politico, 21 November 2025, [TotalEnergies bet big on Africa. Then the killing started](#)

¹¹ [Mozambique LNG: Clarification by TotalEnergies](#)

¹² Le Monde, 15 March 2025, [French prosecutors launch manslaughter probe against TotalEnergies over Mozambique attack](#)

¹³ TotalEnergies, 20 November 2025, [Mozambique LNG: Clarification by TotalEnergies](#) ; TotalEnergies, 2025, [Chronology of exchanges between TotalEnergies and media about Mozambique LNG](#)

¹⁴ Ministry of Finance, Netherlands, 01 December 2025, [Brief aan Eerste of Tweede Kamer - Beantwoording vragen over de exportkredietverzekeringen \(ekv\) voor een LNG project in Mozambique](#) [Update on Dutch involvement in the LNG project in Mozambique and answers to questions from Members Hirsch, Van der Lee and Teunissen]

¹⁵ Pangea-Risk. (2025, November 7). [Mozambique LNG Project: Final report](#)

and the Islamic State (IS) insurgency in Mozambique has not been completely suppressed. Furthermore, the root causes of the conflict remain unresolved, and the Mozambican army is not (yet) in a position to take over the role of the Rwandan army.”

The Pangea Risk report, considers that the deployment of the Rwanda Defence Force (RDF) troops since mid-2021 “has secured key LNG assets” but **“leaves peripheral areas exposed and does not address broader insurgent threats”**. In particular, it stresses that the “islands of security” approach prioritises international investment over civilian protection, potentially entrenching local grievances.” **The report warns that the Islamic State in Mozambique (ISM) “retains significant operational capability” and “the capacity to challenge high-value targets if security guarantees weaken”**. It stresses that the ISM “focus has also shifted toward state and security targets rather than indiscriminate civilian attacks, though violence against civilians persists” (Pangea-Risk, pp. 1-3).

The report also stresses that the financing of security by the European Union, “while TotalEnergies and other private actors fund additional site-level security”, “embed political and reputational risks, including allegations of blurred lines between military deployment and commercial interests” (Pangea-Risk, pp. 2-3)

It concludes that “while immediate operational risk is mitigated, systemic vulnerabilities persist, including insurgent resilience, fiscal fragility, and reliance on external actors, which should inform LNG stakeholders’ assessment of project sustainability and long-term risk exposure” (Pangea-Risk, p. 3).

Economic Risks, Worsened Local Socio-Economic Conditions and Environmental Damage

As we have shared in our previous communications, independent economic analysis shows that the project is likely to generate low and delayed revenues for Mozambique¹⁶, and tax avoidance mechanisms and contractual terms shift an overwhelming share of risk and costs onto the country¹⁷. TotalEnergies has demanded even greater concessions from the Mozambican government, including extended operating licenses and higher budgetary coverage.¹⁸

Resettled communities, displaced from their lands and deprived of access to the sea, now face severe hardship.¹⁹ With very limited viable means of livelihood, they are burdened by soaring food prices and increasing insecurity. Many families remain with unresolved resettlement grievances, including without compensation fields.²⁰

¹⁶ West and Lépiz, 2021, [Too Late to Count: a financial analysis of Mozambique's gas sector](#)

¹⁷ van Teeffelen & Kiezebrink, 2023, [The treaty trap: tax avoidance in Mozambique's extractive industries: the gas companies](#)

¹⁸ CDD, 29 October 2025, [Mozambique LNG will resume, but with even fewer expected benefits for Mozambicans](#)

¹⁹ Justiça Ambiental!, August 2025, [Energy projects fuel hunger in Palma](#)

²⁰ Moz24H, 15 August 2025, [Palma residents want Totalenergies out of Afungi – Moz24h](#); Justiça Ambiental, 14 May 2025 [Resettlement Chaos continues at Afungi gas site](#); US DFC IAM, 13 August 2025, [IAM Assessment Report Rovuma LNG Project. Mozambique](#)

The Mozambique LNG development threatens an ecologically important sensitive ecosystem on the East African coast. While the risks to biodiversity and nature-dependent livelihoods are high, an independent assessment indicates significant flaws and omissions in the environmental impact assessment for the project.²¹ Sensitive coral habitat in Palma Bay has already been destroyed by dredging for the project.²² The project would contribute significantly to global greenhouse gas emissions, at precisely the moment when financiers are under pressure to align portfolios with climate commitments.²³

A Clear and Urgent Need for Withdrawal

In light of the seriousness of the allegations, the deteriorating security context, the economic instability the project poses to Mozambique, and the active legal investigations underway, **we strongly urge your institution to withdraw all financial support to the Mozambique LNG project.**

Now is the moment to choose a path consistent with your institution's human rights, ESG, and climate commitments. People's lives, and Mozambique's political, economic, and ecological future, depend on it.

We kindly request an answer to this letter before January 15th, 2025. We will incorporate the bank's response in our future communications. We remain available for further discussions with you and your team and will pay close attention to your decision.

Yours sincerely,

Justiça Ambiental!
Afrikagrupperna
BankTrack
Friends of the Earth Europe
Friends of the Earth France / Les Amis de la Terre France
Friends of the Earth Japan
Milieudefensie
Reclaim Finance
ReCommon
Solutions for our Climate
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²¹ Engelbrecht CA, et al, (2025), [True Risk: The environmental risks of deep-sea gas exploitation in the Rovuma Basin of Cabo Delgado, Mozambique](#).

²² Data Desk, 27 August 2025, [Dredging in Palma Bay, Mozambique](#)

²³ Mail&Guardian, 18 September 2025, [Mozambique: Gas is not part of Africa's solution to climate change](#)