Dear Mr. Bando Kazuhiko:

Media exposés reveal that the Mozambican government secretly arranged $2 billion worth of loans and bonds – via Credit Suisse AG and Russian bank VTB Group - without securing mandatory parliamentary approval. The French Bank, BNP Paribas, was involved in loan syndication. In November 2017, all three banks did not respond to requests to comment on the allegations with Credit Suisse directing reporters to its 2016 Annual Report. Though the investments were supposedly to pay for boats to catch tuna, the bonds actually paid primarily for military equipment. The government has admitted that it wanted to use the military equipment to protect the gas reserves and provide investment in related projects and companies. The government had hoped to quietly repay the debt via revenue from contract security work for the offshore oil and gas reserves and fishing, but low natural gas prices and an underperforming fishing fleet upended that plan.

Regulators are investigating the parties potentially involved in covering up this secret debt. The Federal Bureau of Investigation (FBI) and Department of Justice (DOJ) in the U.S. are investigating Credit Suisse, VTB, and BNP Paribas to see whether they made improper payments to Mozambican officials and helped the country take on more debt than its economy could sustain. The U.K. is also investigating whether Credit Suisse and VTB deceived investors; a Swiss regulator is conducting a similar investigation of Credit Suisse. As a result of the debt cover-up, Moody’s downgraded Mozambique’s credit rating, finding the outlook for the country to be negative. Moreover, VTB is on the U.S. and E.U. sanctions lists, meaning that NEXI would potentially violate these sanctions if it were to support this project.

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1 Joshua Franklin & Wendell Roelf, *Swiss and UK Watchdogs Quiz Credit Suisse over Mozambique Debt*, REUTERS (7 June 2016), https://uk.reuters.com/article/uk-mozambique-debt-credit-suisse-gp-idUKKCN0YT1ES. One loan, subsequently converted into sovereign debt, was for $850 million for the Mozambique Tuna Company, Ematum.
6 See Wirz, Wernau & Stevis supra note 3.
In addition to the debt, corruption, and sanctions concerns, this LNG development will have detrimental impacts on local communities and the climate.\(^8\) Despite about 80 percent of the country lacking access to electricity,\(^9\) the project does not attempt to improve that figure, evidenced by its dependence on the sale of gas to overseas markets, especially in Europe and Asia.\(^10\) Neither Mozambican law, nor the contract with Anadarko appear to require that locals benefit from the gas development. In addition, the promised jobs are likely to go to foreigners and Mozambicans from cities, rather than local communities, and resources that local communities depend on – agriculture and fishing – will be destroyed.\(^11\) Unique ecosystems, such as mangroves, and endangered species will be put at great risk of complete destruction.\(^12\) Already land grabs of residential and farming land, inadequate resettlement or compensation without consent from communities and government harassment has taken place.

As for climate impacts, NASA recently found that the fossil fuel industry is responsible for most of the rise, which is “substantially larger” than previously thought, in global methane emissions.\(^13\) Worsening this global crisis, scientific studies have shown that lifecycle emissions of LNG projects are as high as those of coal projects, in part due to the multiple energy-intensive stages of LNG.\(^14\) Gas is not a climate change solution;\(^15\) government ECA support for new gas infrastructure would lock the world into fossil fuels for decades, blocking the transition to renewable energy.

Finally, the region where this gas development is occurring in northern Mozambique, Cabo Delgado, has experienced a recent increase in violence. Armed groups in the region have killed at


\(^13\) John R. Worden, et al., Reduced Biomass Burning Emissions Reconcile Conflicting Estimates of the Post-2006 Atmospheric Methane Budget, 8 NATURE COMMUNICATIONS 2,227 (2017), https://www.nature.com/articles/s41467-017-02246-0.


least 39 people in the past couple of months,\textsuperscript{16} causing many local people to flee to neighboring islands. In response to the violence, the embassies of the United States,\textsuperscript{17} France, and United Kingdom\textsuperscript{18} have issued warnings, recommending that their citizens leave the area. Some of the companies working in the area, including Anadarko, have placed their employees in the area on lock-down.\textsuperscript{19} This insecurity puts financing investments at risk if work cannot proceed as planned.

Given the environmental and social impacts of the gas development and Mozambique’s extremely precarious financial standing, ongoing corruption investigations tied to the LNG projects, security issues, and international sanctions, it is clear that NEXI must not use taxpayer dollars to support, in any way, this natural gas deal. Such support would undermine U.S., Swiss and other regulatory efforts to investigate potential corruption and hold corrupt actors accountable.

We appreciate your taking the time to review our comments. We request a response by 5 August 2018.

Sincerely,

350 Africa
Abibiman Foundation (Ghana)
Acção Académica Para O Desenvolvimento Das Comunidades Rurai (Mozambique)
African Climate Reality Project
Asia Pacific Forum on Women, Law and Development
Bank Information Center Europe
Both ENDS (Netherlands)
Center for Biological Diversity (United States)
Corner House (United Kingdom)
Corporate Europe Observatory
Ecologistas en Acción (Spain)
Finance & Trade Watch (Austria)
Friends of the Earth Japan
Friends of the Earth International
Friends of the Earth U.S.
Food & Water Europe
Food & Water Watch
The Gastivists (International)
Jubilee Debt Campaign, UK
Justiça Ambiental (Mozambique)

Les Amis de la Terre (France)
Milieudefensie (Netherlands)
Mineral Policy Institute (United States)
Observatori del Deute en la Globalització (Spain)
Oil Change International (United States)
Re:Common (Italy)
Urgewald (Germany)