March 26, 2018

U.S. Export-Import Bank
811 Vermont Ave NW
Washington, DC 20571

To whom it may concern:

We, the undersigned groups, urge the U.S. Export-Import Bank (EXIM) to reject support for the liquefied natural gas (LNG) development in northern Mozambique. The risks presented by the hidden debt and related corruption investigation, international sanctions, and the environmental and social impacts should prevent export credit agencies (ECAs) from supporting the LNG development in northern Mozambique. We understand that the EIA studies for the project are under revision and take note of the fact that these revised studies are not available to local stakeholders.

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.¹ 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.² Though the investments were supposedly to pay for boats to catch tuna, the bonds actually paid primarily for military equipment.³ 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.⁴

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 EXIM would potentially violate these sanctions if it were to support this project.

In addition to the debt, corruption, and sanctions concerns, this LNG development will have detrimental impacts on local communities and the climate. Despite about 80 percent of the country lacking access to electricity, 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. 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. Unique ecosystems, such as mangroves, and endangered species will be put at great risk of complete destruction. 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. 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. Gas is not a climate change solution; government ECA support for new gas infrastructure would lock the world into fossil fuels for decades, blocking the transition to renewable energy.

6 See Wirz, Wernau & Stevis supra note 3.
Given the environmental and social impacts of the gas development and Mozambique’s extremely precarious financial standing, ongoing corruption investigations tied to the natural LNG projects, and international sanctions, it is clear that EXIM 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. Further, it would put the good faith and credit of the U.S. government behind this project and its associated scandals, even as the FBI and DOJ investigate the alleged corruption.

We appreciate your taking the time to review our comments. We request a response by April 9, 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)

cc: Department of Justice
    Federal Bureau of Investigations