



Alison Nankivell
President and Chief Executive Officer
Export Development Canada
150 Slater St., Ottawa, ON, Canada
K1A 1K3

Public query addressed by email.

16 December 2025

Dear President,

I am writing to inform you that a formal complaint has been submitted to Equator Principles Limited regarding the Papua LNG project. The complaint identifies serious concerns regarding apparent non-adherence with multiple Equator Principles and IFC Performance Standards.

The complaint has been made by the Centre for Environmental Law and Community Rights Inc in Papua New Guinea, Jubilee Australia Research Centre, the Asian Peoples' Movement on Debt and Development, the Japan Center for a Sustainable Environment and Society, Market Forces and Reclaim Finance.

Given Export Development Canada's commitments under the Equator Principles, we write to request urgent clarity on your bank's exposure or potential involvement in Papua LNG – or conversely, if Export Development Canada's policies or investment approach would exclude involvement in such as project.

Please find the complaint attached. This includes a summary of key points but also outlines, in detail, concerns related to non-adherence to Equator Principles 2, 3, 4, 5, 6 and 10 and IFC Performance Standard 1, 5, 6 and 7. We request that the complaint is included, in full, in the public disclosure of this query.

The concerns raised span those related to Indigenous Peoples' rights, human rights, biodiversity, climate and transparency.

We also note that the company leading the Papua LNG project – TotalEnergies – is currently the subject of a [criminal complaint](#) that alleges “complicity in war crimes, torture and enforced disappearance in Mozambique”.

We look forward to your response.

Regards,

Shona Hawkes
Director of Environmental Justice, Jubilee Australia Research Centre, on behalf of complainant organisations:

Centre for Environmental Law and Community Rights Inc.
Jubilee Australia Research Centre
Asian Peoples' Movement on Debt and Development
Japan Center for a Sustainable Environment and Society
Market Forces
Reclaim Finance