

**To: Minister Runqiu Huang  
President of the Convention on Biological Diversity Conference of Parties 15  
Minister of the Ministry of Ecology and Environment of the People's Republic of China**

CC:

CC: Ministry of Ecology and Environment, Ministry of Commerce, National Development Reform Commission, State-owned Asset Supervision and Administration Commission of the State Council, China Banking and Insurance Regulatory Commission, China Banking Association, China Development Bank, Export-Import Bank of China, Bank of China, Industrial and Commercial Bank of China, China Construction Bank, Agricultural Bank of China, Bank of Communications, Postal Savings Bank of China, China Merchants Bank, Industrial Bank, China Everbright Bank, China Export and Credit Insurance Corporation, China Reinsurance, Belt and Road Initiative International Green Development Coalition Secretariat

**Re: Promoting Biodiversity Protection in Ensuring High Quality Chinese Overseas Investments and Activities**

*December 15, 2022*

Dear Mr. Huang Runqiu,

We represent 90 civil society organizations from nearly every region of the world. We are writing to you in your capacity as the President of the Fifteenth Meeting of the Conference of the Parties to the United Nations Convention of Biological Diversity (COP15). The outcomes of this meeting will impact today's and future generations – biodiversity loss is increasingly recognized as a global challenge on par with climate change. Development models and practices which prioritised economic growth over the environment have caused and exacerbated these global crises, and so we hope China can provide the political leadership the world needs to stop unsustainable development and course correct away from what scientists are calling “the sixth extinction”, in which human activities are directly driving global extinctions.

As China plays a leading role in chairing COP15, there is an opportunity for Chinese actors involved in overseas activities to help stop and reverse the biodiversity crisis, in addition to restoring critical ecosystems. **We ask that Chinese actors involved in overseas investments act on China's commitments in prioritizing biodiversity conservation and environmental protection.**

**We also ask relevant regulatory authorities, including the Ministry of Environment and Ecology, to ensure overseas Chinese actors, particularly banks and companies, understand and prioritize biodiversity protection in the selection, planning, and implementation processes of global development projects.** Given the increase of Chinese overseas investments, it is crucial that Chinese banks and companies are able to meet international and Chinese policy expectations in protecting biodiversity, people, and the environment.

Biodiversity Commitments in Chinese Policies

During the first session of COP15 in Kunming in October 2021, President Xi Jinping stated that biodiversity “lays the foundation for human survival and development....We need to speed up efforts to foster a green way of development and secure a win-win of economic growth and environmental protection, so as to build a homeland of coordinated advancement of economy and the environment.”<sup>1</sup> Since 2013, various government authorities have published policies and guidance regarding strengthening environmental protection and biodiversity protection in overseas projects, and it is clear that biodiversity protection is a major, overarching theme in Chinese policies related to overseas investments.

This is a positive trend, as few countries have developed extensive policy frameworks to guide and manage their overseas activities. Recently, the Ministry of Ecology and Environment and Ministry of Commerce jointly published the *Guidelines for Ecological Environmental Protection in Foreign Investment Cooperation and Construction Projects* and the *Guidelines for Green Development in Foreign Investment and Cooperation*. These new policies provide useful guidance that companies should follow throughout project cycles to minimize environmental impacts, such as conducting biodiversity studies and considering alternative project locations if necessary, and adopting international standards to prevent environmental and social risks.

Furthermore, the 2022 *Opinions on Jointly Promoting Green Development of the Belt and Road* issued by the National Development and Reform Commission provided important guidance on giving high importance to local communities’ demand for ecological and environmental protecting, as well as on reducing impacts on protected areas and ecologically sensitive and vulnerable areas. The policy also gives more clarity on how to implement Xi Jinping’s 2021 statement that China would stop building new overseas coal power plants and prioritise supporting developing countries to develop green and low carbon energy. As coal and fossil fuel projects not only have harmful environmental, climate, and social impacts, but may also have negative biodiversity impacts, the announcement showed that China is able to rule out support to harmful sectors whose negative environmental and climate impacts are well established.

## The Role of China’s Banking Sector in Protecting Biodiversity

According to the Secretariat on the Convention on Biological Diversity, a key challenge is “to find economic policies that motivate conservation and sustainable use by creating financial incentives for those who would otherwise over-use or damage the resource”<sup>2</sup>. In ensuring that economic policies conserve biodiversity, it is important that banks are aligned in creating and supporting appropriate, non-perverse “financial incentives” to prevent over-use and damaging resources. In supporting Chinese overseas investments, Chinese banks

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<sup>1</sup> “Full text: Xi Jinping's speech at the COP15 leaders' summit”, China Daily, October 12, 2021. <https://www.chinadaily.com.cn/a/202110/12/WS61653286a310cdd39bc6e685.html>

<sup>2</sup> “Sustaining life on Earth How the Convention on Biological Diversity promotes nature and human well-being”, Secretariat of the Convention on Biological Diversity, April 2000. <https://www.cbd.int/doc/publications/cbd-sustain-en.pdf>

play a critical role in screening, withholding, and thus pre-empting financing going towards low-quality activities with negative biodiversity impacts.

As upstream actors, Chinese banks can significantly influence biodiversity conservation and environmental protection by prioritizing sustainable activities through both positive and negative financial incentives. However, the record of Chinese banks' involvement in controversial projects testifies to the need to do more to not only hold their clients accountable, but also themselves for supporting activities with adverse environmental and biodiversity impacts<sup>3</sup>. In one study, for example, researchers found that linear infrastructure associated with the Belt and Road projects would impact 32 protected areas, 40 key biodiversity areas, and 26 critically endangered species<sup>4</sup>.

Chinese banks have yet to develop and publish their own institutional biodiversity related policies. However, there are positive signs that Chinese banks are increasingly recognizing the importance of biodiversity protection. For instance, in 2021 all major Chinese policy and commercial banks endorsed the “Joint Declaration of Banking Sector to Support Biodiversity Conservation”, which promoted strengthening biodiversity risk management, disclosure, and performance<sup>5</sup>.

Furthermore, the 2022 publication of the Green Finance Guidelines for the Banking and Insurance Industry marks a new high point in China's green finance policies, with a number of risk management, disclosure, and stakeholder requirements which can help pre-empt and manage biodiversity concerns. In particular, the Guidelines require banks to include environmental and social loan clauses and remedies clauses (Article 21), hold bank staff accountable for violating green finance regulations (Article 26), establish stakeholder communication channels and grievance mechanisms (Article 14), and avoid “high-energy-consuming, high-emission, and low-quality projects” (Article 12).

If implemented well, these requirements can help ensure Chinese banks are able to screen and filter out activities with negative biodiversity impacts throughout all stages of financing. At the same time, it is welcome that these guidelines acknowledge the role that all stakeholders, including civil society and impacted communities, can play in informing and engaging Chinese banks of their overseas impacts. With the Green Finance Guidelines, the

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<sup>3</sup> “Under the spotlight: Chinese banks' risky agribusiness portfolio”, Global Witness, June 7, 2021. <https://www.globalwitness.org/en/campaigns/forests/under-spotlight-chinese-banks-risky-agribusiness-portfolio/>; Erik Koons, “Chinese Banks Risk their Reputation With Investments in Coal”, Energy Tracker Asia, May 18, 2021. <https://energytracker.asia/chinese-banks-risk-their-reputation-with-investments-in-coal/>; “Dams Built by China”, International Rivers. <https://archive.internationalrivers.org/taxonomy/term/1045>; “Risks to Global Biodiversity and Indigenous Lands from China's Overseas Development Finance”, Boston University, September 20, 2021. <https://www.bu.edu/gdp/2021/09/20/risks-to-global-biodiversity-and-indigenous-lands-from-chinas-overseas-development-finance/>; Rebecca Ray and Blake Alexander Simmons, “Tracking China's Overseas Development Finance”, Boston University, December 7, 2020. <https://www.bu.edu/gdp/2020/12/07/tracking-chinas-overseas-development-finance/>; “Chinese state-owned company accused of endangering rare orang-utans”, Financial Times, June 18, 2022. <https://www.ft.com/content/b15d75ea-cced-4204-8540-912f9e693a5e>

<sup>4</sup> Li Shuen Ng, et al, “The scale of biodiversity impacts of the Belt and Road Initiative in Southeast Asia”, Biological Conservation, Volume 248, August 2020. <https://www.sciencedirect.com/science/article/abs/pii/S0006320720307497?via%3Dihub>

<sup>5</sup> 《银行业金融机构支持生物多样性保护共同宣示》，中国银行业杂志，October 20, 2021. <https://mp.weixin.qq.com/s/k7Rx9imfJAWSYo8ZO06TQQ>

Green Credit Key Performance Indicators, as well as other positive green finance policies, Chinese banks should now have adequate guidance necessary to identify and avoid activities with negative environmental and biodiversity outcomes.

Encouragingly, we note that there are concrete examples of Chinese banks withdrawing from controversial projects associated with serious biodiversity impacts. In 2020, ICBC confirmed it was no longer involved the Lamu coal plant in Kenya, which if built, would have negatively impacted a World Heritage site and fragile marine ecosystems. In 2019, Bank of China withdrew financial support from the Batang Toru Dam in Indonesia after international concerns regarding the survival of the world's most critically endangered ape, the Tapanuli orangutan. In another compelling example, in 2016 China Exim Bank withdrew financing from Egiin Gol Hydropower Plant in Mongolia, which if built would have affected important endangered salmonid habitat in Mongolia and the Lake Baikal World Heritage Site in Russia. While these examples are positive, they are unfortunately the exception rather than the norm. For instance, while Bank of China withdrew from the Batang Toru Dam, State Development and Investment Corporation (SDIC) quietly bought the project, leading to concerns that the dam may still move forward and jeopardize the survival of the Tapanuli orangutan with Chinese support<sup>6</sup>.

## The Critical Importance of Recognizing Indigenous and Community Rights in Protecting Biodiversity

The important role of Indigenous and local communities play in conserving biodiversity is increasingly being recognized. According to the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), "Governance, including customary institutions and management systems and co-management regimes that involve indigenous peoples and local communities, can be an effective way to safeguard nature and its contributions to people by incorporating locally attuned management systems and indigenous and local knowledge"<sup>7</sup>. Furthermore, although Indigenous Peoples make up just 5% of the world's population, they protect 80% of the world's remaining biodiversity<sup>8</sup>.

However, research suggests Chinese overseas investments pose a risk to the protection of Indigenous lands and the people who live there. One study found that "63% of China-financed projects overlap with critical habitats, protected areas or Indigenous lands, with up to 24% of the world's threatened birds, mammals, reptiles and amphibians potentially impacted by the projects. Hotspots of the risks are primarily distributed in northern sub-Saharan Africa, Southeast Asia and parts of South America. Overall, China's development

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<sup>6</sup> "Chinese state-owned company accused of endangering rare orang-utans", Financial Times, June 18, 2022. <https://www.ft.com/content/b15d75ea-cced-4204-8540-912f9e693a5e>

<sup>7</sup> "Global Assessment Report on Biodiversity and Ecosystem Services", Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, 2019. <https://ipbes.net/global-assessment>

<sup>8</sup> Gleb Raygorodetsky, "Indigenous peoples defend Earth's biodiversity—but they're in danger", National Geographic, November 19, 2018. <https://www.nationalgeographic.com/environment/article/can-indigenous-land-stewardship-protect-biodiversity->

projects pose greater risks than those of the World Bank, particularly within the energy sector”<sup>9</sup>.

Ensuring “mutually beneficial” and “win-win” outcomes is a cornerstone principle in Chinese overseas policies. Yet Chinese banks and companies have yet to normalize and require the use of rights-based approaches in engaging Indigenous and local communities. For instance, no Chinese bank requires clients to implement free, prior, informed consent (FPIC) processes when engaging with Indigenous or impacted communities. Although Chinese green finance policies are increasingly recognizing the importance of stakeholder communication, Chinese banks and companies remain opaque institutions, in which letters and communications from the public often go unacknowledged, or may even be rejected.

If Chinese banks and companies are to succeed in achieving biodiversity goals, they will need to establish transparent and open communication mechanisms and stakeholder engagement with civil society and impacted communities. This is in line with President Xi’s address that “the international community must enhance cooperation, build consensus and pool strength to build a community of all life on Earth”. As major international actors, Chinese banks and companies are part of this international community, and should thus in turn do more to help “build a community” that benefits all communities on Earth.

## Looking Forward

In light of these concerns, we include a list of examples that we believe, in their current form, are emblematic of high biodiversity risk, low-quality projects currently being considered or developed by Chinese actors.

We hope China will inspire and take the lead as a responsible actor in global development and biodiversity protection. Many Belt and Road projects have been implemented in or are planned in important and sensitive biodiversity areas, and so enforcing the aforementioned government policies with strong measures are crucial to ensure China is able to meet its commitment to build a “Green Belt and Road” and ensure overseas projects safeguard the environment, conserve biodiversity, and protect people.

With this in mind we hope the following recommendations can help encourage Chinese actors to reduce potentially harmful biodiversity impacts of their overseas activities.

### **Chinese financiers, developers, and sponsors should:**

- Fully comply with the Chinese policies regarding environmental, social, and biodiversity protection in overseas projects, including the aforementioned guidelines, as well as international norms and best practices
- Develop and implement robust biodiversity protection policies

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<sup>9</sup> “Risks to Global Biodiversity and Indigenous Lands from China’s Overseas Development Finance”, Boston University, September 20, 2021. <https://www.bu.edu/gdp/2021/09/20/risks-to-global-biodiversity-and-indigenous-lands-from-chinas-overseas-development-finance/>

- Effectively conduct relevant due diligence processes and require the use of robust, credible, comprehensive, and transparent environmental impact assessments and biodiversity studies in line with international standards, which assess the full range of available alternatives, and account for cumulative impacts
- Respect the rights of Indigenous Peoples and local communities
- Require consultation processes to be conducted in line with free, prior, informed consent (FPIC) standards, and allow for inclusive decision-making throughout the project cycle
- Establish accessible, clear, and effective channels of communication at an institutional level
- Establish and implement robust information disclosure and transparency policies
- Develop and implement fair and effective project level grievance mechanisms and institutional accountability mechanisms for all relevant local stakeholders, which aligns with the 2022 Green Finance Guidelines
- Prohibit direct and indirect financing to any unsustainable, harmful activities which may negatively impact and degrade high biodiverse areas, including but not limited to: internationally and nationally recognized areas, habitats with threatened and endemic species, key biodiversity areas, free flowing rivers, primary and vulnerable secondary forests, at risk marine and protected coastlands, and iconic transboundary ecosystems (such as the Amazon, Arctic, Albertine Rift, among others)
- Prohibit direct and indirect financing to sectors well established to cause and drive harmful environmental, biodiversity, and social impacts, including but not limited to fossil fuels, large hydropower, industrial agriculture, among others, per findings from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)<sup>10</sup>
- Institutionalize China’s commitment to not develop, support, and build any new and planned overseas coal power related activities and projects
- Prohibit the harmful development of activities)and preclude direct and indirect financing which may impact highly biodiverse, critical ecosystems, including primary and vulnerable secondary forests, free flowing rivers, at risk marine coastland ecosystems, internationally and nationally protected areas, habitats with endangered and/or endemic species, Key Biodiversity Areas, iconic transboundary ecosystems, and areas where free, prior, informed consent of Indigenous and local communities have not been obtained; an approach to protect biodiversity involving exclusion areas would be consistent with China’s Ecological Red Lines

**Relevant Chinese authorities, including financial regulators, should:**

- Ensure Chinese financiers, developers, and sponsors legally comply with the Chinese policies regarding environmental, social, and biodiversity protection in overseas projects
- Ensure accessible, clear, and effective channels are in place for communities to communicate with Chinese regulators and authorities

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<sup>10</sup> “Global Assessment Report on Biodiversity and Ecosystem Services”, Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, 2019. <https://ipbes.net/global-assessment>

- Require Chinese financiers, developers, and sponsors to improve and strengthen information disclosure and transparency policies and practices, including establishing effective, accessible communication channels
- Require Chinese financiers, developers, and sponsors to develop effective project level grievance mechanisms and institutional accountability mechanisms
- Prohibit Chinese financiers, developers, and sponsors from providing direct and indirect financing to any unsustainable, harmful activities which may negatively impact and degrade high biodiverse areas, including but not limited to: internationally and nationally recognized areas, habitats with threatened and endemic species, key biodiversity areas, free flowing rivers, primary and vulnerable secondary forests, at risk marine and protected coastlands, and iconic transboundary ecosystems (such as the Amazon, Arctic, Albertine Rift, among others)
- Embed protecting and respecting of Indigenous and local communities' rights as a cornerstone principle in Chinese policy frameworks for overseas activities, and require of consultation processes to be conducted in line with free, prior, informed consent (FPIC) standards
- Strengthen regulatory systems by establishing and developing mechanisms to penalize Chinese financiers, developers, sponsors, and contractors for failing to address and respond to negative environmental, biodiversity, and social impacts of their overseas activities
- Prohibit Chinese financiers, developers, and sponsors from supporting sectors well established to cause and drive harmful environmental, biodiversity, and social impacts, including but not limited to fossil fuels, large hydropower, industrial agriculture, among others, per findings from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)<sup>11</sup>
- Prohibit the harmful development of activities and direct and indirect financing which may impact highly biodiverse, critical ecosystems, including primary and vulnerable secondary forests, free flowing rivers, at risk marine coastland ecosystems, internationally and nationally protected areas, habitats with endangered and/or endemic species, Key Biodiversity Areas, iconic transboundary ecosystems, and areas where free, prior, informed consent of Indigenous and local communities have not been obtained; an approach to protect biodiversity involving exclusion areas would be consistent with China's Ecological Red Lines

We wish you and all other participating countries a fruitful meeting, and appreciate your time. We remain at your disposal should you need any additional information on projects listed here, or if you would like to discuss any other details contained in this letter. Kindly confirm receipt of this letter by contacting us at [csosforbiodiversity@gmail.com](mailto:csosforbiodiversity@gmail.com). We welcome your feedback.

Sincerely,

1. NGO 350 Côte d'Ivoire, Côte d'Ivoire

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<sup>11</sup> "Global Assessment Report on Biodiversity and Ecosystem Services", Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, 2019. <https://ipbes.net/global-assessment>

2. A Rocha Ghana, Ghana
3. AbibiNsroma Foundation, Ghana
4. Africa Coalition for Corporate Accountability, Africa
5. Africa Institute for Energy Governance, Uganda/Africa
6. African Law Foundation, Nigeria
7. Amazon Watch, International
8. Angir nuden Munduuhuu NGO, Mongolia
9. AnsvarligFremtid, Denmark
10. Australian Forests and Climate Alliance, Australia
11. Balkanka Association Sofia, Bulgaria
12. Bank Information Center, United States
13. BankTrack, International
14. Buliisa Initiative for Rural Development Organisation, Uganda
15. Captured In Africa Foundation, South Africa
16. Center for Energy, Ecology, and Development, Philippines
17. Central and Eastern Europe Bankwatch Network, Central and Eastern Europe
18. Centre de Défense des Droits de l'Homme et Démocratie, Democratic Republic of Congo
19. Centre for Natural Resource Governance, Zimbabwe
20. Centro de Documentación e Información Bolivia, Bolivia
21. Centro de Documentación en Derechos Humanos, Ecuador/Latin America
22. Centro de Información sobre Empresas y Derechos Humanos, Colombia
23. Centro de Políticas Públicas y Derechos Humanos, Peru
24. Colectivo sobre Financiamiento e Inversiones China Derechos Humanos y Ambiente, Latin America
25. Coletivo Proteja, Brasil - Amazônia
26. Committee for Peace and Development Advocacy, Liberia/West Africa
27. Community Resource Centre, Thailand
28. Conservation Action Trust, India
29. Consumers' Association of Penang, Malaysia
30. CooperAcción, Perú
31. Derecho Ambiente y Recursos Naturales, Perú
32. Early Warning System, Chile
33. Earthlife Africa, South Africa
34. EarthRights International, Global
35. Elephanatics, Canada
36. Enda Lead Afrique Francophone, Sénégal
37. Equitable Cambodia, Cambodia
38. Foundation for the Conservation of the Earth , Nigeria
39. Friends of the Earth Australia , Australia
40. Friends of the Earth Colombia/CENSAT, Colombia
41. Friends of the Earth Indonesia/WALHI, Indonesia
42. Friends of the Earth Mexico/Otros Mundos, México
43. Friends of the Earth Malaysia/ Sahabat Alam Malaysia, Malaysia
44. Friends of the Earth US, United States
45. Friends with Environment in Development, Uganda
46. Fundación Ambiente y Recursos Naturales, Argentina



47. GegenStroemung – CounterCurrent, Germany
48. Global March for Elephants and Rhinos, United States
49. Gobi Soil NGO, Mongolia
50. Green Advocates International, Liberia
51. Green Development Advocates, Cameroon
52. Inclusive Development International, United States
53. Indus Consortium, Pakistan
54. Inkrispena, Indonesia
55. Innovea Development Foundation, Global
56. Institute for Ecology and Action Anthropology, Germany
57. Institute of Sustainable Development, Malawi
58. International Rivers, United States
59. Kanan Derechos Humanos, Mexico
60. Kanopi Hijau Indonesia, Indonesia
61. Lamu Youth Alliance, Kenya
62. Latinoamérica Sustentable, Ecuador - Latin America
63. Laudato Si Movement- Africa, Africa
64. Le Groupe de Recherche et de Plaidoyer sur les Industries Extractives, Côte d'Ivoire
65. Mekong Watch, Japan
66. Mizu Eco-Care, Zambia
67. Mouvement Ecologique, Luxembourg
68. Natural Resource Women Platform, Liberia
69. NGO Forum on ADB, Philippines
70. Observatoire congolais pour la Gouvernance Locale, Democratic Republic of Congo
71. Observatoire d'Etudes et d'Appui à la Responsabilité Sociale et Environnementale, Democratic Republic of Congo
72. Observatorio Latinoamericano de Conflictos Ambientales, Chile
73. ONG Ecosistemas, Chile
74. Oyu Tolgoi Watch, Mongolia
75. Pakistan Fisherfolk Forum, Pakistan
76. Pan African Sanctuary Alliance, Africa and United States
77. Peace Point Development Foundation, Nigeria
78. Psychological Responsiveness NGO, Mongolia
79. Public Interest Law Center Chad, Chad
80. Réseau Camerounais des Organisations des Droits de l'Homme, Cameroun
81. Rivers Without Boundaries, Mongolia
82. Rivers Without Boundaries Coalition, International
83. Save Lamu, Kenya
84. Save Virunga, International
85. Stichting Onderzoek Multinational Ondernemingen, Netherlands
86. Strategic Youth Network for Development, Ghana
87. Sustentarse, Chile
88. Trend Asia, Indonesia
89. Urgewald, Germany
90. Witness Radio – Uganda, Uganda

## Appendix 1: List of Selected Projects

Local communities and groups have expressed concern regarding the following Chinese overseas projects and activities due to environmental, social, climate, and/or biodiversity impacts. Brief descriptions of these projects are included in Appendix 2.

1. Dabar Hydropower Plant, Bosnia and Herzegovina
2. Erdeneburen Dam, Mongolia
3. Ghana Integrated Bauxite Development Project, Ghana
4. Koukoutamba Dam, Guinea
5. 1320 SSRL Thar Coal Block-I 7.8mtpa & Power Plant Electric), Pakistan
6. Project Gran Buriticá S.A.S. (Buriticá mine), Colombia
7. Mirador Large-scale Mining Project, Ecuador
8. San Carlos-Panantza Mining Project, Ecuador
9. Río Blanco Mining Project, Ecuador
10. Las Bambas Mining Project, Peru
11. Marcona Mine, Peru
12. Toromocho Mining Unit, Peru
13. Hydroelectric complex on the Santa Cruz River, Argentina
14. Coca Codo Sinclair Hydroelectric Project, Ecuador
15. Ivirizu Hydroelectric Project, Bolivia
16. São Manoel Hydroelectric Dam, Brazil
17. Rucalhue Hydroelectric Power Plant, Chile
18. Drilling and Exploitation of the Ishpingo Field, Block 43- ITT, Ecuador
19. Orinoco Oil Belt, Venezuela
20. Mayan Train Project, Mexico
21. Dumestre Hydrobiological Resources Processing Plant, Chile
22. Dairi Prima Mineral Mine, Indonesia
23. Indonesia Morowali Industrial Park , Indonesia
24. Amazarsky Saw and Paper Mill and Loguhe-Pokrovka Border Crossing, Russia
25. Julius Nyerere Hydropower Plant and Kidunda Dam Water Supply Project, Tanzania
26. Northern Sea Route Oil, Gas and Mining Projects, Russia
27. Power of Siberia-II (Soyz-Vostok) Gas Pipeline (Pipeline Russia-Mongolia-China), Russia, Mongolia and China
28. Zashulansky Coal Mine, Russia
29. “Blue Horse” Program of Mongolia: Water infrastructure projects, Mongolia
30. Rogun Hydropower Station, Tajikistan
31. Tampur Dam Project, Indonesia
32. Turgusun HPP, 24.9 MW, Kazakhstan
33. Mining and processing complex at the Bogutinskoye tungsten ore deposit, Kazakhstan
34. Batang Toru Dam, Indonesia
35. East African Crude Oil Pipeline (EACOP) and the Associated Tilenga and Kingfisher Oil Fields, Uganda and Tanzania
36. Simlong Energy Industrial Park Project, Philippines
37. Greater Tortue Ahmeyim Project, Mauritania and Senegal

## Appendix 2: Brief Descriptions of Selected Projects

### 1. Dabar Hydropower Plant<sup>12</sup>

**Key project developers and/or contractors:** Hidroelektrana Dabar d.o.o., a subsidiary of Elektroprivreda Republike Srpske, which is a public utility owned by the Republika Srpska entity of Bosnia and Herzegovina

**Financiers:** Export-Import Bank of China

**Sector:** Energy – Hydropower

**Status:** Financing agreement signed

**Location:** Bosnia and Herzegovina

The massive Upper Horizons scheme would decrease the flow of the river Neretva, whose delta in Croatia is already suffering from salination. As an important agricultural area, this in itself is a massive impact. It would also further decrease the amount of water available for the Hutovo Blato wetland Ramsar site, already being dried out by the existing Čapljina hydropower plant. The project would also involve closing a large sinkhole in the Nevesinjsko karst field, which may endanger the water flow to the iconic Buna, Bunica and Bregava rivers that are of absolutely crucial importance to towns like Blagaj and Stolac as well as being home to protected species such as the soft-mouthed trout.

#### Further Information:

- CEE Bankwatch Network, “Why hydropower in southeast Europe is a risky investment”, July 2022. <https://bankwatch.org/wp-content/uploads/2022/07/Why-hydropower-in-southeast-Europe-is-a-risky-investment.pdf>
- Daria Sito-Sucic, “Bosnia's HE Dabar seals deal with China's Exim bank for 160 MW hydropower plant”, Reuters, 5 January 2022. <https://www.nasdaq.com/articles/bosnias-he-dabar-seals-deal-with-chinas-exim-bank-for-160-mw-hydropower-plant>
- Ante Šunjić, “Republika Srpska angažirala Kineze za gradnju HE Dabar, dolina Neretve ostaje bez dvije milijarde kubika slatke vode!”, Dubrovački Vjesnik, 7 January 2022. <https://dubrovacki.slobodnadalmacija.hr/dubrovnik/zupanija/neretva/republika-srpska-angazarala-kineze-za-gradnju-he-dabar-dolina-neretve-ostaje-bez-dvije-milijarde-kubika-slatke-vode-1157349>

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<sup>12</sup> The Dabar hydropower plant is part of the Upper Horizons complex consisting of: the Dabar - 160 MW, Nevesinje - 60 MW, and Bileća - 32 MW.

## 2. Erdeneburen Dam

**Key project developers/contractors:** PowerChina

**Financiers:** Export-Import Bank of China

**Sector:** Energy – Hydropower

**Status:** Agreement

**Location:** Mongolia

The proposed 90MW Erdeneuren Dam in Mongolia is to be sited in Tsambagarav Uul National Park, which is also recognized as a protected wetland under the Ramsar Convention. If built, the dam would lead to host of negative biodiversity impacts on endangered species such as snow leopards and swan goose, among others. In addition to negative biodiversity impacts, local communities and even government officials have protested the dam for its impacts of dispossessing pastoral and nomadic communities of their livelihoods.

### Further Information

- Sukhgerel Dugersuren, “Opinion: Still time to rethink Mongolia’s biggest dam to date”, The Third Pole, June 3, 2022.  
<https://www.thethirdpole.net/en/energy/opinion-still-time-to-rethink-mongolias-erdeneburen-hydropower-plant/>
- Bolor Lkhaajav, “China-Financed Hydroelectric Power Plant Faces Popular Opposition in Mongolia”, The Diplomat, August 24, 2022.  
<https://thediplomat.com/2022/08/china-financed-hydroelectric-power-plant-faces-popular-opposition-in-mongolia/>
- “Erdeneburen hydropower plant project, Mongolia”, Environmental Justice Atlas, Updated October 10, 2022. <https://ejatlas.org/conflict/erdeneburen-hydropower-plant-project-mongolia>
- “Mongolian Government Seeks to Criminalize Citizens Opposing Erdeneburen Dam Project”, Rivers Without Boundaries, September 2, 2022.  
<https://www.transrivers.org/2022/3754/>

### 3. Ghana Integrated Bauxite Development Project

**Key project developers and/or contractors:** Sinohydro and others to be determined<sup>13</sup>

**Financiers:** Industrial and Commercial Bank of China, or any other bank that the creditor may select<sup>14</sup>

**Sector:** Mining

**Status:** Preparation

**Location:** Ghana

The iconic Atewa Forest is one of Ghana's last remaining intact forests and home to several endemic and critically endangered species such as the White-naped Mangabey and Afia Birago Puddle Frog. Any habitat loss is very likely to cause their extinction. Local dissent is strong: the forest communities do not want the bauxite mining as it would pollute their water, land and clean air, and cause loss of livelihoods, but they have not been consulted. The forest is also a critical watershed providing clean water daily to over 5 million Ghanaians: the proposed mining location on Atewa's mountaintops would pollute this vital water source with toxic heavy metals. The Atewa Range Forest Reserve is a Key Biodiversity Area.

#### Further Information:

- Atewa TEEB report and policy brief", A Rocha Ghana.  
<https://ghana.arocha.org/resources/download-atewa-teeb-report-policy-brief/>
- "Atewa Forest is a 'NO GO AREA' for Mining. GIADEC and strategic partner must walk away immediately", A Rocha Ghana, August 15, 2022.  
<https://ghana.arocha.org/news/atewa-forest-is-a-no-go-area-for-mining-giadec-and-strategic-partner-must-walk-away-immediately/>
- "New species to science discovered in Atewa Range Forest Reserve", A Rocha Ghana, July 8, 2021. <https://ghana.arocha.org/news/new-species-to-science-discovered-in-atewa-range-forest-reserve/>
- "BREAKING: Zero extinction status makes Atewa NO-GO area for mining". 9 April 2021. <https://ghana.arocha.org/news/breaking-zero-extinction-status-makes-atewa-no-go-area-for-mining/>
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<sup>13</sup> According to the Master Project Support Agreement (MPSA), Sinohydro agreed to arrange one or more loan facilities to cover 85% of the costs of Priority Projects, in which Sinohydro will construct for the government of Ghana in exchange for bauxite. Although Sinohydro is noted as an arranger of the projects, the Ghanaian government is still seeking a partner for the actual mining.

<http://ir.parliament.gh/bitstream/handle/123456789/1279/BILLION%20CORPORATION.pdf?sequence=1&isAllowed=y>

<sup>14</sup> According to the MPSA, ICBC or any other bank that the creditor may select may be approached for financing bauxite mining.

<http://ir.parliament.gh/bitstream/handle/123456789/1279/BILLION%20CORPORATION.pdf?sequence=1&isAllowed=y>

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#### 4. Koukoutamba Dam

**Key project developers and/or contractors:** The Organisation for the Development of the Senegal River (OMVS) and PowerChina (EPC contractor)

**Financiers:** Export–Import Bank of China - *Pending*

**Sector:** Energy – Hydropower

**Status:** Agreement

**Location:** Guinea

The Koukoutamba Dam would be built within and have severe adverse impacts on the Moyon Bafing National Park, which was established in 2017 to protect an important stronghold for the critically endangered Western chimpanzee. The national park is home to the single largest population of the Western chimpanzee, a sub-species whose population has declined by 80% in the last 25 years. If built, the Koukoutamba Dam could result in the deaths of up to 1500 chimpanzees within the national park.

#### Further Information:

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## 5. Thar Coal Block-I Mine & Power Plant (2x66MW)

**Key project developers and/or contractors:** Sino Sindh Resources Limited (SSRL, a subsidiary of Shanghai Electric Group); Shanghai Electric Engineering Design Company Limited and Shanghai Electric Hong Kong International Engineering Company Limited (subsidiaries of Shanghai Electric Group) as engineering procurement, and construction contractors; CCTEG Shenyang Engineering Company (a subsidiary of China Coal Technology Engineering Group) as design contractor

**Financiers:** China Development Bank, Export–Import Bank of China, Industrial and Commercial Bank of China (ICBC), and Habib Bank are supporting the power plant. ICBC is supporting the coal mine development.

**Sector:** Energy – Coal Power/Development

**Status:** Under construction

**Location:** Pakistan

Development of coal mining and construction of a coal power plant in the ecologically sensitive Thar desert region is being supported by Chinese banks and companies. As an open pit mine, Thar Coalfield Bloc-I involves massive excavations, in which the removed soil is dumped on the surface. Once the coal resources are fully exploited, the pit will be closed by depositing the excavated soil therein, which dramatically disturbs the natural, local geology formed over millennia, causing disastrous impacts on the local ecosystem in the long term.

The Thar desert is home to drought resilient flora and fauna. The local plant species, having deep roots that tap aquifers, can survive even the harshest and most prolonged droughts. Many of these drought-resilient plant species provide fodder for livestock—a major source of livelihood for local population. The entire process of massive coalmining, excavations of mines and closing of pits is likely to disturb the roots of these plants, which may result in their extinction. In addition, the extensive water usage by both the coal mine and the power plant, disposal of brine from the mine, and effluent discharged from the power plant will undermine the fragile hydrology, contaminate groundwater, and create a serious water crisis in Thar.

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## 6. Project Gran Buriticá S.A.S.<sup>15</sup>

**Key project developers and/or contractors:** Zijin-Continental Group, a subsidiary of Zijin Mining Group

**Financiers:** Unknown

**Sector:** Mining - gold, silver, copper, lead, zinc

**Status:** Operational

**Location:** Colombia

The Buriticá project is Colombia's first large-scale underground gold mining project with an expected 14-year life span. Ever since it became operational, social and environmental conflicts deepened. The community, with a large population of children and the elderly and have been affected by the growth of informal mining, have raised serious environmental impacts due to mercury and cyanide contamination, and high consumption of water to keep the project running. The impacted community has also denounced impacts on their health, freedom of movement, and right to live in a healthy and peaceful environment.

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<sup>15</sup> This project is also known as the Buriticá mine.

## 7. Mirador Large-scale Mining Project

**Key project developers and/or contractors:** Ecuacorriente S.A. (ECSA) is owned by CRCC-Tongguan, which in turn is jointly owned by China Railway Construction Corporation (CRCC) and Tongling Nonferrous Metal Group (TNMG)

**Financiers:** China Development Bank, Bank of China, Export-Import Bank of China, Mercantile Bank of China, China Construction Bank, and Industrial and Commercial Bank of China

**Sector:** Mining – copper, gold, and silver

**Status:** Operational

**Location:** Ecuador

Mirador is the first large-scale open-pit mining project in Ecuador. It is located in one of the most biodiverse areas in Ecuador's southern Amazon - the "Condor Mountain Range", which is home to a number of Indigenous peoples. A number of issues related to this project have been raised, including the infringement of the rights to Free, Prior and Informed Consent, housing, and to living in a healthy environment. This has also encouraged persecution, harassment, and criminalization of community leaders. The main environmental impacts include the contamination of rivers, deforestation and irreversible pollution of the ecosystem.

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## 8. San Carlos-Panantza Mining Project

**Key project developers and/or contractors:** ExplorCobres S.A. (EXSA), owned by the Chinese companies CRCC Tongguan Investment Co. Ltd., Tongling Nonferrous Metals Group Holdings Co. Ltd., and China Railway Construction Corporation (CRCC)

**Financiers:** Bank of China, China Development Bank, Export-Import Bank of China, China Merchants Bank, China Construction Bank, and Industrial and Commercial Bank of China.

**Sector:** Mining - copper and molybdenum

**Status:** Stalled

**Location:** Ecuador

The San Carlos-Panantza copper mining project comprises an open-pit mine of 38,548 hectares in the southern Amazon of Ecuador. It is estimated that 70% of the territory of the Shuar Arutam People is under concession for this project, which may affect 47 community centers – which impacts around 1,200 families. In 2016, various Indigenous families were forcibly evicted from their homes causing a humanitarian crisis, jeopardizing the tenure of the lands that make up the ancestral territory of the Shuar Arutam People. In November 2022, the Constitutional Court withdrew the Environmental License for the project.

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## 9. Río Blanco Mining Project

**Key project developers and/or contractors:** Ecuagoldmining South America, which is owned by the Chinese company Junefield Group S.A.

**Financiers:** Unknown

**Sector:** Mining - gold

**Status:** Stalled

**Location:** Ecuador

The Río Blanco gold mining project is located nearby the Macizo del Cajas Biosphere Reserve and the Cajas National Park's buffer zone. Local communities allege the company's land acquisitions are illegal, and Río Blanco community leaders and human rights defenders have reported harassment and intimidation by the national police and military forces. In 2018, a local court ordered the project's seizure due to lack of compliance with the Indigenous communities' right to Free, Prior, and Informed Consent. Local opposition has led to the project stalling, in which the Chinese company withdrew without reparation measures or ensuring a responsible exit. Despite intense controversy, there is the possibility that the project may still continue in the future.

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## 10. Las Bambas Mining Project

**Key project developers and/or contractors:** Minerals and Metals Group MMG Limited, Guoxin International Investment Co. Ltd., CITIC Metal Co. Ltd.

**Financiers:** China Development Bank, Export-Import Bank of China, Industrial and Commercial Bank of China, and Bank of China

**Sector:** Mining – copper

**Status:** Operational

**Location:** Peru

Las Bambas, located in the high Andean areas of southern Peru, is one of the most important copper mines in Latin America. Acquired by a Chinese consortium in 2014, it is the largest overseas acquisition of mining assets by any Chinese entity at the time. The project has caused environmental and human health problems, due to noise and dust pollution. Indigenous and farming communities affected by the project have suffered from the excessive use of force by the Peruvian national police that has resulted in deaths, injuries, and arbitrary arrests of several community members. Since its operations began local protests over the project's socio-economic and environmental impacts have caused major production suspensions.

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## 11. Marcona Mine

**Key project developers and/or contractors:** Shougang Hierro Perú S.A.A, a subsidiary of Shougang Corporation

**Financiers:** Industrial and Commercial Bank of China and DBS Bank Hong Kong

**Sector:** Mining

**Status:** Operational

**Location:** Peru

The Marcona mining project, located approximately 420 kilometers southeast of Lima, is the only large-scale iron ore mine currently in operation in the country and has been sending all its production to China for 30 years. It is one of the most conflictive mining projects in the country and has accumulated lawsuits for numerous labor rights violations. The mine takes up about 40% of the area of the municipality of Marcona, which causes overcrowding and a lack of access to services for the population in the urban area. Additionally, sea contamination and health impacts have been reported in other facilities of the mining complex.

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## 12. Toromocho Mining Unit

**Key project developers and/or contractors:** Aluminum Corporation of China (Chinalco), owner of Minera Chinalco Perú S.A. (Chinalco Peru)

**Financiers:** China Development Bank, and Export-Import Bank of China

**Sector:** Mining - copper

**Status:** Operational

**Location:** Peru

The Toromocho mining project is one of the largest mining investments in the history of Peru. Since 2012 the project has relocated approximately 1,200 families and people have lost their livelihoods and jobs. Chinalco has failed to comply with agreements set with the community regarding the generation of jobs for resettled families. In addition, there are environmental problems regarding rivers and lakes contamination and water supply, which is expected to worsen as the mine expands.

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### 13. Santa Cruz River Hydroelectric Complex<sup>16</sup>

**Key project developers and/or contractors:** China Gezhouba Group Corporation in association with Hidrocuyo S.A. and Electroingeniería S.A.

**Financiers:** China Development Bank (CDB), Industrial and Commercial Bank of China, and Bank of China

**Sector:** Energy – Hydropower

**Status:** Under construction since 2015

**Location:** Argentina

The Santa Cruz River Hydroelectric Complex is the third most important hydroelectric complex in Argentina. It is also viewed as the most expensive to be financed and built by Chinese entities. Due to its location in the fragile Patagonian ecosystem, the project will likely impact the third-largest ice expanse in the world, threatening glacier movements and endemic wildlife. The project will induce impacts on the life and culture of 14 Indigenous communities in the area, such as the Tehuelche-Mapuche Indigenous peoples, and threatens their access to water in future generations. Currently, environmental organizations and Indigenous communities are taking legal action to stop the project.

#### Further Information:

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<sup>16</sup> The name of this project has changed several times. Previous names include the Kirchner–Cepernic Hydroelectric Complex and then the Cóndor Cliff–Barrancosa Hydroelectric Complex.



#### 14. Coca Codo Sinclair Hydroelectric Project

**Key project developers and/or contractors:** Cocasinclair EP, Sinohydro Corporation (contractor)

**Financiers:** Export-Import Bank of China

**Sector:** Energy – Hydropower

**Status:** Operational

**Location:** Ecuador

The Coca Codo Sinclair Hydroelectric project is the largest and most expensive infrastructure project in Ecuador's history. The project is located in the Coca River Basin in the Amazonian region. The lack of due diligence, and technical, social, and environmental studies since the project's beginning affected the construction and operation of the plant and has caused irreversible environmental damage in the river basin, including changes in ecological water flows, the disappearance of the San Rafael Waterfall, and regressive erosion processes. The integrity of homes, livelihoods, and the right to health, food, among others, have thus been threatened.

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## 15. Ivirizu Hydroelectric Project

**Key project developers/ contractors:** Sinohydro Corporation Limited (contractor)

**Financiers:** Unknown

**Sector:** Energy – Hydropower

**Status:** In construction

**Location:** Bolivia

The Ivirizu Hydroelectric Project involves the construction of two hydroelectric power plants. As the first hydroelectric project to be built in a national protected area in Bolivia, the construction of the respective 180 MW and 74 MW hydroelectric power plants have affected more than 280 hectares of forest within the Carrasco National Park, which includes the habitat of several endangered species of flora and fauna. The project will likely affect 18 peasant communities in the area. In addition, development of the project has driven deforestation in the area, in which the hydroelectric plants' access roads have been used for the illegal entry of coca leaf growers. As a result, the fragile balance of the Carrascos ecosystem and the stability of the communities may lead to significant negative risks.

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## 16. São Manoel Hydroelectric Dam

**Key project developers and/or contractors:** China Three Gorges

**Financiers:** China Development Bank

**Sector:** Energy – Hydropower

**Status:** Operational

**Location:** Brazil

The Sao Manuel dam is the first 'greenfield' hydroelectric project in Brazil with Chinese capital. It is located on the Teles Pires River, a principal tributary of the Tapajós River in the Brazilian Amazon. Since its construction the project has faced opposition for its irreversible impacts on water quality, death of animals, deforestation, and the livelihoods of local communities. The construction of the dam has led to a decline in freshwater species, including the fish and turtles that are central to local diets. The decline in fish has severely impacted fishermen, who have reported fish catches plummeting to as low as 15% of their catch compared to the years before the dam. The area where the São Manoel Dam was built has been inhabited by Indigenous peoples, including the Munduruku, Kayabi and Apiaká, for millennia. For instance, it is located just 700 meters from the Kayabi Indigenous Territory; this area includes the Indigenous sacred site *Dekoka'a*, which is of incalculable importance to Indigenous cosmology.

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## 17. Rucalhue Hydroelectric Power Plant

**Key project developers and/or contractors:** China International Water & Electric

**Financiers:** Unknown

**Sector:** Energy – Hydropower

**Status:** Construction

**Location:** Chile

The Rucalhue project is the first Chinese investment in the Chilean hydropower sector. It is intended to be the fourth hydroelectric plant to be installed on the Biobío River, a highly environmentally sensitive area, where hydroelectric projects have already caused negative cumulative impacts on water quality, the flow regime, and the habitat of species in the area. According to the project's Environmental Impact Study, the dammed area will be at least 7.7 kilometers long, affecting an area of unique environmental value in a region inhabited by more than 1.5 million people. Since the construction began, the project has caused deforestation and social conflicts. Local communities and civil society organizations report affected Indigenous people were denied their right to Free, Prior, and Informed consent, and the right to a healthy environment.

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## 18. Ishpingo Oilfield, Block 43- ITT

**Key project developers and/or contractors:** China National Petroleum Corporation (CNPC), Chuanqing Drilling Engineering Company Limited (contractor)

**Financiers:** Unknown

**Sector:** Energy - Oil

**Status:** Exploitation

**Location:** Ecuador

The Block #43 is known as ITT, which includes the oil fields of Ishpingo, Tambococha and Tiputini. It is the largest crude oil reserve in Ecuador. It extends over almost 2,000 hectares in the Ecuadorian Amazon, 100 of which lie inside the Yasuní National Park, a biodiversity hotspot designated as a biosphere reserve by UNESCO in 1989. Of the three fields that make up the ITT, Ishpingo is the most sensitive and high risk area due to presence of Indigenous peoples who live in this territory, as well as for the potential environmental and biodiversity impacts on the Yasuní ecosystem itself. CNPC has operated in the ITT since 2018. This year, it has begun exploiting the Ishpingo field, resulting in rampant deforestation and social-environmental conflicts among local communities and local defenders.

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## 19. Orinoco Oil Belt

**Key project developers and/or contractors:** Sinovensa, which is a joint venture by China National Petroleum Corporation (CNPC) and Petr leos de Venezuela (PDVSA)

**Financier:** China Development Bank

**Sector:** Oil

**Status:** Operational

**Location:** Venezuela

The Orinoco Oil Belt extends over a 55,000 km<sup>2</sup> area and encompasses around 20% of the world's oil resources. It is a globally important wetland, an area of high biodiversity, and a critical habitat to numerous endangered species. In addition, the Orinoco River is one of the lushest rivers in South America and the world. Historically, there is very limited access to information on the socio-environmental performance of Sino-Venezuelan oil companies. However, since 2018 fires and oil spills have been reported which affect the environment and livelihood of the communities, their agricultural production, and drinking water quality. Issues associated with the infringement of the right to previous consultation, a healthy environment, and to respect the traditional lands of Indigenous communities have also been raised.

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## 20. Mayan Train Project

**Key project developers and/or contractors:** China Communications Construction Company (CCCC), Mota-Engil México<sup>17</sup>, among others

**Financiers:** Mexican development Bank Banobras and potentially others

**Sector:** Railway transport

**Status:** Construction

**Location:** Mexico

The Mayan Train is the Mexican Federal government's largest public transportation facility, consisting of 1,554 kilometers of railroad tracks that will cross five states in the south-southeast of the country. Once functional, the line will connect a complex of extractive industries such as wind farms, hydroelectric plants, palm oil agrofuel plants, gas pipelines, hydrocarbon exploration projects, among others. It will cross along a corridor inhabited by hundreds of Indigenous communities and very important ecosystems such as the Calakmul Biosphere Reserve, the largest forest reserve in Mexico. Indigenous and local communities have raised concerns on the environmental impacts, lack of transparency, violation of the rights to previous consultation, healthy environment, housing (due to displacements), among others.

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## 21. Dumestre Hydrobiological Resources Processing Plant

**Key project developers and/or contractors:** Australis Seafoods S.A, which is owned by the Chinese company Joyvio Group

**Financiers:** Unknown

**Sector:** Aquaculture - Salmon farming

**Status:** Construction completed, to be operational in December 2022

**Location:** Chile

The Dumestre Salmon Processing Plant is an industrial mega-complex with a seven hectares extension in Patagonia. Due to its environmental and social impacts, the project faces huge opposition from broad sectors in Chile. Local authorities and communities have raised numerous irregularities with the plant such as the lack of transparency, and insufficient environmental studies. The plant is estimated to produce more than 23,000 cubic meters of industrial liquid waste per day, use electrical energy equivalent to 20% of homes in Natal, the vehicular traffic associated with the plant will increase by 200 trips and there will be about 12,000 less liters of water for the communities due to the requirements that the plant will have.

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## 22. Project Name: Dairi Prima Mineral Mine

**Project developer:** PT. Dairi Prima Mineral (DPM) is a subsidiary of China Nonferrous Metal Industry's Foreign Engineering and Construction Co., Ltd. (NFC). NFC is the majority owner of the mine and responsible for the Engineering, Procurement and Construction (EPC) of the mine.

**Financiers:** Unconfirmed

**Sector:** Mining

**Status:** Construction

**Location:** Dairi Regency, North Sumatra Province, Indonesia

The mine is located at the head of a river system inhabited by 11 Indigenous villages. Habitats of endangered species such as orangutans has been identified downstream of the mine, in which the distance of the mine to the closest village is less than 1 kilometer. Located in an area with some of the highest earthquake risks in the world, there is a high potential for catastrophic collapse of the proposed Tailings Storage Facility; if the tailings facility collapses, it could result in hundreds of lives lost, as well as damage more than 200 kilometers of the river system. The mine and tailings facility also presents risks to surface and ground water from acidic drainage and sediment, with high concentrations of dissolved metals.

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### 23. Indonesia Morowali Industrial Park

**Key project developers and/or contractors:** Shanghai Decent Investment (Group) Company Limited (a subsidiary of Tsingshan Holding Group Company Limited); PT Bintang Delapan Group; and PT Sulawesi Mining Investment

**Financiers:** China Development Bank, Export–Import Bank of China, Bank of China, Industrial and Commercial Bank of China (ICBC), HSBC China

**Sector:** Nickel mining

**Status:** Operational

**Location:** Indonesia

With the rise of nickel mining and the processing industry in the Indonesia Morowali Industrial Park, communities living nearby have suffered from a new wave of land grabbing and have seen their human rights undermined, as the area has been developed for industry. Environmental pollution and the degradation of the coastal marine environment next to the nickel mining areas has caused issues for surrounding communities. As the river mouth is now covered with mud and sedimentation, fisherfolks, not able to dock fishing boats near their homes, can only go fishing during high tide, and have to travel farther and longer, yet with fewer catches and higher logistics costs. Equally concerning are the labour rights abuses, including lack of decent wages, excessive overtime and occupational health and safety concerns, which has been reported by workers employed by companies operating at the Indonesia Morowali Industrial Park.

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## 24. Amazarsky Saw and Paper Mill and Loguhe-Pokrovka Border Crossing

**Key project developers and/or contractors:** Heilongjiang Xingbang Guoji, Heilongjiang Longxin Co.

**Financier:** China Development Bank

**Sector:** Pulp and Paper

**Status:** Stalled

**Location:** Russia

The project planned on logging three million hectares is in the last remaining areas of primary biodiversity rich boreal forests situated along the Sino-Russian border and build roads to fragment and ease access to this sensitive wilderness area accelerating habitat and biodiversity loss. Developing a reservoir for industrial water supply on Amazar River affected population of endangered Siberian Taimen, the largest salmonid in the world. In addition, logging operations and new roads will threaten the traditional land use of local communities and Evenki Indigenous people. Since 2013, local scientists, activists, and communities have fought to stop the project due to its negative environmental, social, and biodiversity impacts. They are now calling for the area to become a protected due to its rich biodiversity, and are also calling for the removal of a dam already built on the Amazar River as it is legally non-compliant.

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## 25. Julius Nyerere Hydropower Plant and Kidunda Dam Water Supply Project

### Key project developers and/or contractors:

- *For the Julius Nyerere Hydropower Plant:* Tanzania Electric Supply Company, PowerChina, Xuzhou Construction Machinery Group Co. Ltd., Dongfang Electric Corporation, Arab Contractors LLC
- *For the Kidunda Dam:* Dar es Salaam Water and Sewerage Authority, PowerChina (contractor)

### Financiers:

- For the Julius Nyerere Hydropower Plant:* Unconfirmed
- For the Kidunda Dam:* Concessional loan from China

**Sector:** Energy – Hydropower and water supply

**Status:** Construction

**Location:** Tanzania

The Julius Nyerere Hydropower Plant project (also known as Stiegler’s Gorge Dam) is located along the Rufiji River in the iconic Selous Game Reserve, a UNESCO World Heritage site and home to black rhino, elephants and other threatened species. The project would irrevocably damage the outstanding universal value of the Selous Game Reserve by destroying critical habitat for endangered species, as well as negatively impacting Ramsar wetlands downstream to the project. The Egyptian EPC contractors signed a nearly US\$1 billion sub-contract with PowerChina in 2019. Additional contracts signed with Dongfang Electric and other Chinese companies.

Kidunda Dam is expected to negatively impact the flow of water in Rufiji River, and thus eventually affect the flora and fauna in the Selous Game Reserve World Heritage site. Its reservoir will flood part of its territory adding to damage caused by the Julius Nyerere Hydropower Plant. Both dams have been opposed by the UNESCO World Heritage Centre and IUCN.

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## 26. Northern Sea Route Oil, Gas, and Mining Projects

### Key project developers and/or contractors:

- *Yamal LNG and Arctic-2 LNG projects*: Novatek, China National Petroleum Corporation, China National Offshore Oil Corporation Ltd, Total, Chinese Offshore Oil Engineering Co.

- *Taimyr Coal project*: VostokUgol, Coal India Limited

- *Arctic Oil projects*: Gazpromneft co., Rosneft corp.

- *Arctic shipping and shipbuilding*: Zvezda Shipyard, China State Shipbuilding Corporation, Hudong-Zhonghua Shipyard, Rosatomflot, COSCO Ltd., China Nonferrous Metal Industry's Foreign Engineering and Construction, Kaz Minerals Co.

**Financiers**: Silk Road Fund, China Development Bank, Export-Import Bank of China, Russian National Wealth Fund, Sberbank and Gazprombank, and other sources.

**Sector**: Energy, Mining, Transportation

**Status**: Operation, construction, and exploration

**Location**: Russia

The Russian “Northern Sea Route” Program involves developing shipping lines for transporting products from several gas, oil, coal and copper projects in the Arctic. Projects include the Yamal LNG, Arctic-2 LNG projects, Taimyr Coal project, Baimskaya copper mine and Arctic shipping and shipbuilding investments.

The Arctic is an extremely sensitive and at-risk ecosystem due to climate change. Mineral extraction in the region thus threatens fragile Arctic terrestrial and marine ecosystems. Port construction threatens coastal fisheries and bird rookeries. Shipping increases the likelihood of oil and fuel spills. The extraction, transportation, and burning of fossil fuels in the area causes pollution which cannot be mitigated due to ice conditions. Furthermore, permafrost thaw increases the risk of releasing infectious diseases stored in the ice for centuries.

Environmental groups have called for a freeze on fossil fuel-related development on and off the coast of Arctic Ocean. Indigenous peoples of Chukotka have also protested port construction at Cape Nagleynyn for shipping of Baimskaya copper ore.

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## 27. Power of Siberia-II (Soyz-Vostok) Gas Pipeline (Pipeline Russia-Mongolia-China)

**Key project developers and/or contractors:** Gazprom and China National Petroleum Corporation

**Financiers:** Unconfirmed

**Sector:** Energy – Gas transportation

**Status:** Planning

**Location:** Russia-Mongolia-China

The Power of Siberia-II Gas Pipeline was backed by the governments of all three countries in 2018. However, the pipeline may affect high biodiversity areas, including fragmenting and destroying areas like World Heritage sites, Russia's Tunkinsky National Park, and vast pristine grassland ecosystems in Mongolia. Affected peoples, including Indigenous herders, have not been properly consulted according to the principles of Free, Prior Informed Consent.

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## 28. Zashulansky Coal Mine

**Key project developers and/or contractors:** Razrezugol LLC, Shenhua (China Energy Investment Corporation), EN+ Group

**Financiers:** Russian government financing and undisclosed financiers

**Sector:** Energy and Mining

**Status:** Construction

**Location:** Russia

The Zashulansky Coal Mine is being developed by Razrezugol LLC, a joint venture between EN+ Group and Shenhua. The project and associated infrastructure threaten to fragment primary forests known for high biodiversity. The project will also degrade existing local roads due to increase in coal transportation, and cross a protected area safeguarding mineral water springs. Significantly, key project developers did not conduct any consultations based on Free, Prior and Informed Consent principles. As a result, local community leaders have been calling to stop the project.

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## 29. “Blue Horse” Program of Mongolia

### Key project developers/ contractors:

- *Egiin Gol Hydroelectric Dam*: China Gezhouba, Tractebel Engineering
- *Kherlen-Gobi and Orkhon-Onggi water transfer projects*: Erdenes-Mongol Co., Prestige Group, and other unconfirmed developers

**Financiers:** Export-Import Bank of China, Mongolian government funding, and other international sources

**Sector:** Energy and Water Supply

### Status:

- *Egiin Gol Hydro* – Stalled
- *Kherlen-Gobi and Orkhon-Onggi water transfer projects* : planning

**Location:** Mongolia

The “Blue Horse” Program includes five large and more than 25 medium-sized water infrastructure projects. The program plans for building 33 dams on 12 rivers of Mongolia. Collectively, the projects threaten three World Heritage and ten Ramsar sites, blocking fish migration, and dewatering key rivers and protected wetlands along East-Asian-Australasian Flyway. If built, the dams would likely create transboundary tensions with China (via the Kherlen River) and Russia (via the Selenge River and Ulz River).

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### 30. Rogun Hydropower Station

**Key project developers and/or contractors:** Rogun Hydro, Salini Impregilo (Webuild), Sinohydro 16th Bureau/PowerChina

**Financiers:** Tajikistan Government, negotiating additional funding with Bank of China and China Export Credit Insurance Corporation, AIIB, World Bank.

**Sector:** Energy - Hydropower

**Status:** Construction

**Location:** Tajikistan

The dam will likely exacerbate if not trigger transboundary conflicts, threaten downstream agricultural communities, and disrupt hydro-ecological balance in the Aral Sea Basin. The dam will interrupt flows and degrade floodplain forests in the “Tiger Gorge” nature reserve (IUCN category I) and may contribute to extinction of critically endangered Amu-Darya false shovelnose sturgeon. It will also necessitate involuntary resettlement of up to 35,000 people. Given the increasing project costs, it may increase the country’s foreign debt, which may prevent the country exploring better development alternatives.

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- World Bank. Tajikistan Public Expenditure Review, <https://www.worldbank.org/en/country/tajikistan/publication/per-2022>

### 31. Tampur Dam Project

**Key project developers and/or contractors:** PT. Kamirzu

**Financiers:** China Minsheng Bank, Industrial and Commercial Bank of China, other international financiers

**Sector:** Energy - Hydropower

**Status:** Stalled

**Location:** Indonesia

The 430 MW Tampur Dam project is located in the heart of the Leuser Ecosystem, one of the largest and most biodiverse forest ecosystems in Southeast Asia, spanning across Aceh and North Sumatra provinces. The Leuser Ecosystem is internationally recognized for its outstanding biodiversity and primary tropical forests, and is part of Gunung Leuser National Park, one of three national parks which collectively comprise the Tropical Rainforest Heritage of Sumatra, a World Heritage Site. The Tampur Dam area contains key elephant corridors that connects the elephant population in Gunung Leuser National Park to the forests of North Sumatra; it also contains critical habitat for numerous endangered species such as Sumatran tiger, orangutan, rhino, among other charismatic species. In March 2019, WALHI Aceh filed a lawsuit to Banda Aceh State Administrative Court and the court deemed it illegal for the Aceh Government to issue the permit to use forest lands for dam construction.

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- "Indonesian court cancels dam project in last stronghold of tigers, rhinos", Mongabay, 2 September 2019. <https://news.mongabay.com/2019/09/indonesian-court-cancels-dam-project-in-last-stronghold-of-tigers-rhinos/> - "Study warns of dire ecological, social fallout from Sumatran dam", Mongabay, 23 October 2018. <https://news.mongabay.com/2018/10/study-warns-of-dire-ecological-social-fallout-from-sumatran-dam/>
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## 32. Turgusun-1 Hydropower Plant

**Key project developers and/or contractors:** Turgusun-1 Company, China International Water & Electric Corporation (contractor and supplier)

**Financiers:** Baiterek National Managing Holding JSC through Development Bank of Kazakhstan JSC and its subsidiaries

**Sector:** Energy - Hydropower

**Status:** Operational

**Location:** Kazakhstan

The 24.9 MW Turgusun-1 Hydropower Plant (HPP) may have a negative impact on the ecosystem of the Turgusun River and the population of Siberian Taimen (*Hucho taimen*) by fragmenting its habitat and blocking migration. It is the largest representative of salmon fish in the world, which is listed in the Red Book of Kazakhstan and the IUCN. In the coming years, it is planned to build two more hydroelectric power plants on the Turgusun River with a capacity of 45 MW and 100 MW.

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### 33. Mining and processing complex at the Bogutinskoye tungsten ore deposit<sup>18</sup>

**Key project developers and/or contractors:** China Civil Engineering Construction Corporation, *China Railway Construction International Investment Group Corporation*

**Financiers:** China Merchants Bank

**Sector:** Mining

**Status:** Construction

**Location:** Kazakhstan

The project is located approximately two km from the border of the Charyn National Park and may have a negative impact on the state of the Charyn River and flora and fauna of the Charyn National Park. For example, if tailing dams fail during an earthquake, toxic substances may be released into Charyn and in turn to the Ile rivers – important habitat for endemic fish species. These risks have not been covered by the EIA report presented to public hearings.

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<sup>18</sup> Also known as Kazakhstan Bakuta Tungsten Mine.



### 34. Batang Toru Dam

**Key project developers and/or contractors:** PowerChina

**Financiers:** SDIC Power Group

**Sector:** Energy - Hydropower

**Status:** Construction

**Location:** Indonesia

The Batang Toru Hydropower project is located in one of the most biodiverse, primary forests left in North Sumatra. The project's environmental impact assessment contained serious omissions and inaccurate information, including failing to recognize key critically endangered species such as the Tapanuli orangutan, in addition to a forged signature of one of the key experts in the Environmental Impact Assessment (EIA). Local communities have long opposed the dam development, and scientists have warned that the dam's development will lead to the extinction of the rarest great ape, the Tapanuli orangutan. The project has also been marred by the deaths of dam construction workers, as well as the mysterious death of an Indonesian lawyer who protested the dam. Despite controversy, SDIC Power Group has invested \$277mn in the Batang Toru Dam.

#### **Further Information:**

- "Open Letter to Bank of China", WALHI North Sumatra.  
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### **35. East African Crude Oil Pipeline (EACOP) and the Associated Tilenga and Kingfisher Oil Fields**

**Key project developers and/or contractors:** China National Offshore Oil Corporation (CNOOC), TotalEnergies, Uganda National Oil Company, Tanzania Petroleum Development Corporation

**Financiers:** Unconfirmed<sup>19</sup>

**Sector:** Energy - Oil Development and Transport

**Status:** Construction

**Location:** Uganda and Tanzania

The East African Crude Oil Pipeline is expected to disrupt nearly 2,000 square kilometres of protected wildlife habitat (Biharamulo Game Reserve and Wembere Steppe Key Biodiversity Area) and severely degrade approximately 500 square kilometres of important wildlife corridors for the endangered Eastern Chimpanzee and African Elephant. The pipeline poses a high risk of pollution to critical fresh water supplies, including Lake Victoria, the largest lake in Africa. At the port of Tanga, where the oil will be transferred offshore, two Ecologically or Biologically Significant Marine Areas (EBSAs)—which host Marine Protected Areas, Mangrove Forest Reserves, ecologically significant coral reefs and other wildlife—are at high risk of degradation. It also represents a massive new source of carbon emissions – estimated to be over 34 million metric tons per year.

The associated Tilenga and Kingfisher oil fields are located in the Albertine Graben, one of the richest natural habitats in the world, with Lake Albert being a transboundary lake of birding importance and part of the Murchison Falls-Albert Delta Wetland system, which was designated a Ramsar site in 2009. The Tilenga project entails drilling 130 oil wells within Murchison Falls National Park; while the Kingfisher project central processing facility and well pads are located within the sensitive area of Buhuka Flats and will increase the likelihood of oil spills and pollution in the area. In addition to biodiversity concerns, local communities and civil society activists criticize the project for disrupting livelihoods without prompt and adequate compensation and causing a range of other social impacts, especially Congolese communities who are also impacted but were not consulted.

#### **Further Information**

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### 36. Simlong Energy Industrial Park Project

**Key project developers and/or contractors:** Simlong Energy Development Corp. (a subsidiary of Abacore Capital Holdings, China Petroleum Pipeline Engineering Co., Ltd. (a subsidiary of China National Petroleum Corporation), China Harbour Engineering Company Ltd (a subsidiary of China Communications Construction Company)

**Project financiers:** Unconfirmed

**Sector:** Energy – oil and gas complex (storage, transportation, refinery, power plant)

**Status:** Preparation

**Location:** Philippines

If pursued, the Simlong project will contribute to environmental degradation and habitat destruction such as ocean warming, vast land clearing, sedimentation due to land reclamation, potential destruction of coral reefs, degrading water quality<sup>5</sup> – since it will promote the use and sale of fossil gas products. At this point, there are no clear details regarding whether the proponent has already obtained the consent and approval of the communities affected by the SEDCO project, as required by Philippine law.

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### 37. Greater Tortue Ahmeyim Project

**Key project developers/contractors:** BP plc, Kosmos Energy Ltd, Societe des Petroles du Senegal (PETROSEN), Societe Mauritanienne des Hydrocarbures (SMH), China Ocean Shipping Company (contractor)

**Financiers:** Industrial and Commercial Bank of China (ICBC)<sup>20</sup>

**Sector:** Oil and gas

**Status:** Under Development

**Location:** Mauritania and Senegal

This cross-border offshore liquefied natural gas (LNG) project is the deepest offshore project in Africa to date. It will extract gas from ultra-deep wells at a water depth of 2850 meters, putting the world's largest cold-water reef and migratory bird populations at risk. Less than five km away from the planned terminal lies Mauritania's Dialing National Park, home to 250 different species of birds. The risk of oil spills are a major concern – a potential condensate oil spill could hit the coast of Mauritania and Senegal in less than a week, killing coastal animals and threatening the livelihoods of the people of Mauritania and Senegal.

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<sup>20</sup> The project is partially self-funded by the developers and ICBC is a financier of BP, providing a revolving credit facility.

### **Appendix 3: Full List of Recipients**

**To: Minister Runqiu Huang**

President of the Convention on Biological Diversity Conference of Parties 15  
Minister of the Ministry of Ecology and Environment of the People's Republic of China  
No. 12, East Chang'an Avenue, Dongcheng District, Beijing, 100006, People's Republic of China  
mailbox01@mee.gov.cn / advice@mee.gov.cn / chen.haijun@mee.gov.cn / jing.xin@mee.gov.cn

cc :

**Vice Minister Zhao Yingmin**

Ministry of Ecology and Environment of the People's Republic of China

**Director General Cui Shuhong**

Ministry of Ecology and Environment of the People's Republic of China, Department of Nature and Ecology Conservation

**Director General Zhou Guomei**

Ministry of Ecology and Environment of the People's Republic of China, Department of International Cooperation

**Director Chen Haijun**

Division of International Ecological and Environmental Conventions,  
Ministry of Ecology and Environment of the People's Republic of China, Department of International Cooperation,  
Convention on Biological Diversity Primary National Focal Point of the People's Republic of China

**Director Jing Xin**

Ministry of Ecology and Environment of the People's Republic of China, Division of Biodiversity Conservation, Department of Nature and Ecology Conservation  
Traditional Knowledge and Protected Areas National Focal Point of the People's Republic of China

**Director Zhang Yujun, Deputy Director Li Yonghong**

Ministry of Ecology and Environment of the People's Republic of China, Foreign Environmental Cooperation Center

**Chairman He Lifeng**

National Development and Reform Commission of the People's Republic of China  
No. 38, Yuetan Street, Xicheng District, Beijing, 100824, People's Republic of China  
ndrc@ndrc.gov.cn / bgt@ndrc.gov.cn

**Director General Ying Xiong**

National Development and Reform Commission of the People's Republic of China, Office of Leading Group for the Promotion of the Belt and Road Initiative

**Minister Wang Wentao**

Ministry of Commerce of the People's Republic of China  
No. 2, Chang'an Dongdajie, Dongcheng District, Beijing, 100731, People's Republic of China  
[Xyf3@mofcom.gov.cn](mailto:Xyf3@mofcom.gov.cn) / [Waa@mofcom.gov.cn](mailto:Waa@mofcom.gov.cn) / [hzs@mofcom.gov.cn](mailto:hzs@mofcom.gov.cn) /  
[wangshengwen@mofcom.gov.cn](mailto:wangshengwen@mofcom.gov.cn) / [Xyf1@mofcom.gov.cn](mailto:Xyf1@mofcom.gov.cn) / [Waa2@mofcom.gov.cn](mailto:Waa2@mofcom.gov.cn) /  
[Xietiaochu@mofcom.gov.cn](mailto:Xietiaochu@mofcom.gov.cn)

**Director General Wang Shengwen**

Ministry of Commerce of the People's Republic of China, Department of Outward Investment and Foreign Cooperation

**Director General Jiang Wei**

Ministry of Commerce of the People's Republic of China, Department of West Asian and African Affairs

**Director General Yang Weiqun**

Ministry of Commerce of the People's Republic of China, Department of Asian Affairs

**Chairman Hao Peng**

State-owned Asset Supervision and Administration Commission of the State Council  
No. 26 Xidajie, Xuanwumen, Beijing, 100053, People's Republic of China  
service@sasac.gov.cn / iecc@sasac.gov.cn

**Chairman Guo Shuqing**

China Banking and Insurance Regulatory Commission  
No. 15, Financial Street, Xicheng District, Beijing, 100033, People's Republic of China  
sqxx@cbirc.gov.cn

**Director General Liao Yuanyuan**

China Banking and Insurance Regulatory Commission, International Department

**First Class Inspector Ye Yanfei**

China Banking and Insurance Regulatory Commission, Policy Research Bureau

**Vice President Pan Guangwei**

China Banking Association  
No.80, Guangqumennei Inner Street, Dongcheng District, Beijing  
cba.china@china-cba.net

**Chairman Zhao Huan, President Ouyang Weimin**

China Development Bank  
No.18, Fuxingmennei Street, Xicheng District, Beijing, 100031, People's Republic of China  
csr@cdb.cn / webmaster@cdb.cn

**Chairperson Wu Fulin, President Ren Shengjun**

Export-Import Bank of China  
No. 30, Fuxingmennei Street, Xicheng District, Beijing, 100031, People's Republic of China  
csr@eximbank.gov.cn

**Chairman Liu Liange, President Liu Jin**

Bank of China  
No. 1, Fuxingmen Nei Daijie, Beijing, 100818, People's Republic of China  
ir@bankofchina.com / investor\_relations@bochk.com / csr@bochk.com / corp\_comm@bochk.com  
/ csr@bankofchina.com

**Chairman Chen Siqing, President Liao Lin**

Industrial and Commercial Bank of China  
No. 55 Fuxingmennei Avenue, Xicheng District, Beijing, 100140, People's Republic of China  
[ir@icbc.com.cn](mailto:ir@icbc.com.cn) / [icbchk@icbcasia.com](mailto:icbchk@icbcasia.com) / [csr@icbc.com.cn](mailto:csr@icbc.com.cn) / [icbc.africa@gmail.com](mailto:icbc.africa@gmail.com)

**Chairman Tian Guoli, President Zhang Jinliang**

China Construction Bank  
No. 25, Finance Street, Xicheng District, Beijing, 100033, People's Republic of China  
[ir@ccb.cn](mailto:ir@ccb.cn) / [csr@ccb.cn](mailto:csr@ccb.cn)

**Chairman Zhou Mubing, President Fu Wanjun**

**Agricultural Bank of China**  
No. 69, Jianguomen Nei Avenue, Dongcheng District, People's Republic of China  
[ir@abchina.com](mailto:ir@abchina.com) / [csr@abchina.com](mailto:csr@abchina.com)

**Chairman Ren Deqi, President Liu Jun**

Bank of Communications  
No. 188 Yin Cheng Zhong Road Pudong, Shanghai, 200120, People's Republic of China  
[investor@bankcomm.com](mailto:investor@bankcomm.com) / [auditcommittee@bankcomm.com](mailto:auditcommittee@bankcomm.com)

**Acting Chairman, President Liu Jianjun**

Postal Savings Bank of China  
No. 3, Financial Street, Xicheng District, 100808, People's Republic of China  
[psbc.ir@psbcoa.com.cn](mailto:psbc.ir@psbcoa.com.cn)

**Chairman Miao Jianmin, President Wang Liang**

China Merchants Bank  
China Merchants Bank Tower, No.7088 Shennan Boulevard, Futian District, Shenzhen, China  
[xfzts@cmbchina.com](mailto:xfzts@cmbchina.com) / [office@cmbchina.com](mailto:office@cmbchina.com) / [cmb@cmbchina.com](mailto:cmb@cmbchina.com)

**Chairman Lü Jiajin, President Tao Yiping**

Industrial Bank  
No. 154, Hudong Rd, Fuzhou, Fujian Province, 350003, People's Republic of China  
[sustainability@cib.com.cn](mailto:sustainability@cib.com.cn) / [irm@cib.com.cn](mailto:irm@cib.com.cn)

**Chairman Wang Jiang, General Manager Wu Lijun**

China Everbright Bank  
No. 25, Taipingqiao Avenue Everbright Center Xicheng Dist Beijing, 100033, People's Republic of China  
[IR@cebbank.com](mailto:IR@cebbank.com)

**Chairman Song Shuguang, President Sheng Hetai**

China Export and Credit Insurance Corporation  
Fortune Times Building, 11 Fenghuiyuan, Xicheng District, Beijing, 100032, People's Republic of China  
[webmaster@sinosure.com.cn](mailto:webmaster@sinosure.com.cn) / [dyyyb@sinosure.com.cn](mailto:dyyyb@sinosure.com.cn) / [dsyyb@sinosure.com.cn](mailto:dyyyb@sinosure.com.cn) / [ii-dept@sinosure.com.cn](mailto:ii-dept@sinosure.com.cn)

**Chairman He Chunlei, President Zhuang Qianzhi**

China Reinsurance  
No. 11, Jinrong Avenue, Xicheng, District, Beijing, 100033, People's Republic of China  
[IR@chinare.com.cn](mailto:IR@chinare.com.cn)



**Belt and Road Initiative International Green Development Coalition Secretariat**

No. 5, Houyingfang Hutong, Xicheng District, Beijing 100035, People's Republic of China  
brigg@fecomee.org.cn / brigcsecretariat@163.com