



We therefore appreciate the EU's introduction of the EU Regulation on Deforestation Free Products which came into force on June 29, 2023~~Error! Bookmark not defined.~~. The regulation's aim of guaranteeing "that the products EU citizens consume do not contribute to deforestation or forest degradation worldwide"<sup>1</sup> is critical for the future of our planet.

The regulation is based on the background that "the expansion of agricultural land linked to the production of commodities like cattle, wood, cocoa, soya, palm oil, coffee, rubber, and some of their derived products, such as leather, chocolate, tyres, or furniture"~~Error! Bookmark not defined.~~ are the main drivers of deforestation. These products are consumed in the EU and elsewhere.

Under the regulation, all operators or traders who sell the aforementioned commodities on the EU market must "prove that the products do not originate from recently deforested land or have contributed to forest degradation."~~Error! Bookmark not defined.~~"

The regulation will start being implemented on December 30, 2025 for large and medium companies and June 30, 2026 for micro and small enterprises.

## **OIL AND GAS VIS-À-VIS DEFORESTATION**

The Regulation on Deforestation Free Products is revolutionary and if well implemented, we believe that it will enhance efforts to address deforestation and forest degradation challenges worldwide.

We also believe that the regulation could be further strengthened by adding products such as oil and gas to the legislation.

While the production of agricultural products such as beef, soy, palm and others is the biggest driver of deforestation and forest degradation of tropical forests, the extraction of oil and gas in forest landscapes is perverse too, putting forest conservation at risk.

In Uganda and Tanzania for instance, the East African Crude Oil Pipeline (EACOP) is expected to affect nearly 2,000 square kilometers of protected area<sup>2</sup>, including forest landscapes. The EACOP is expected to transport about 216,000 barrels of crude oil per day from oil fields in Western Uganda to the port of Tanga in Tanzania<sup>3</sup>.

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<sup>1</sup> Regulation on deforestation free products:

[https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products\\_en](https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en)

<sup>2</sup> WWF:

[https://www.banktrack.org/download/safeguarding\\_people\\_nature\\_in\\_the\\_east\\_africa\\_crude\\_oil\\_pipeline\\_project/safeguarding\\_people\\_nature\\_in\\_the\\_east\\_africa\\_crude\\_oil\\_pipeline\\_project.pdf](https://www.banktrack.org/download/safeguarding_people_nature_in_the_east_africa_crude_oil_pipeline_project/safeguarding_people_nature_in_the_east_africa_crude_oil_pipeline_project.pdf)

<sup>3</sup> Ministry of Energy and Mineral Development: [https://memd.go.ug/wp-content/uploads/2020/07/EACOP-PROJECT\\_20230331.pdf](https://memd.go.ug/wp-content/uploads/2020/07/EACOP-PROJECT_20230331.pdf)

Tropical rainforests and others such as Bugoma CFR, Wambabya CFR, Taala CFR and Kasana-Kasambya Forest Reserve<sup>4</sup> are set to be affected by the EACOP project activities in Uganda. On the other hand, the Tilenga oil extraction project is impacting other critical ecosystems including Murchison Falls National Park, Budongo CFR and other forest landscapes.

Uganda is not the only East African country where forests have been put at risk of degradation due to oil activities. In the Democratic Republic of Congo (DRC), 11 million hectares of tropical forests, nearly the size of England, are at risk of degradation due to the Congolese government's plans to auction oil and gas blocks for exploration<sup>5</sup>.

Oil extraction is also taking place in forests in the rest of Africa, Latin America, and other continents with countries such as Equatorial Guinea, Congo-Brazzaville, Gabon<sup>6</sup>, Ecuador, Guyana and others being affected. The world's biggest tropical rainforest, which has been described as the world's lungs, the Amazon<sup>7</sup>, has also not been spared from oil extraction activities.

### **CRITICAL MINERALS VIS-À-VIS DEFORESTATION**

Critical raw materials such as lithium, graphite, copper and others which are highly sought after due to their role in the clean energy transition, digitisation and militarisation also have the potential to drive deforestation.

To protect tropical rainforests, it is important that these are added to the Regulation on Deforestation Free Products.

### **REQUEST FOR MEETING**

Through this letter therefore, we are requesting for a meeting with you on **Friday May 9, 2025 at 11:00am at the EU offices in Kampala** or any other date and time that is suitable for you.

During the meeting, we will share why we are requesting the EU to add oil, gas and critical minerals to the Regulation on Deforestation Free Products to combat deforestation and forest degradation.

We thank you in advance for your kind consideration of this matter.

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<sup>4</sup> AFIEGO: <https://www.afiego.org/wp-content/uploads/2024/03/Factsheet-EACOP-IMPACTED-FORESTS-and-What-Uganda-stands-to-lose.pdf>

<sup>5</sup> The Guardian: <https://www.theguardian.com/world/2022/nov/10/dash-african-gas-wipe-out-congo-basin-rainforests>

<sup>6</sup> WWF: [https://wwf.panda.org/discover/knowledge\\_hub/where\\_we\\_work/congo\\_basin\\_forests/oil\\_extraction/](https://wwf.panda.org/discover/knowledge_hub/where_we_work/congo_basin_forests/oil_extraction/)

<sup>7</sup> WWF: [https://wwf.panda.org/discover/knowledge\\_hub/where\\_we\\_work/amazon/amazon\\_threats/other\\_threats/oil\\_and\\_gas\\_extraction\\_amazon/](https://wwf.panda.org/discover/knowledge_hub/where_we_work/amazon/amazon_threats/other_threats/oil_and_gas_extraction_amazon/)

Yours faithfully,

Dickens Kamugisha

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Chief Executive Officer, AFIEGO

## SIGNATORIES

NO.	NAME	LOGO
1.	Africa Institute for Energy Governance (AFIEGO)	
2.	Youth for Green Communities (YGC)	
3.	African Initiative on Food Security and Environment (AIFE)	
4.	Women for Green Economy Movement Uganda (WoGEM)	
5.	South Western Institute for Policy and Advocacy (SOWIPA)	
6.	Center for Environmental Research and Agriculture Innovations (CERAI)	
7.	Strategic Response on Environment Conservation (STREC)	

8.	Environment Governance Institute Uganda (EGI)	
9.	Youth for Nature Conservancy (YNC)	
10.	Women on Environment Mission Uganda (WEMU)	
11.	Youth for Environmental Justice and climate Action (YEKA)	
12.	Initiative for Green Planet (IGP)	
13.	Guild Presidents Forum on Governance (GPFOG)	
14.	Liberty Probono Initiative (LPI)	
15.	Innovation for the Development and Protection of the Environment (IDPE)	

16.	Federation of Individual Fishermen's Committees of Lake Edouard (FECOPEILE)	
17.	Congolese Alert for the Environment and Human Rights (ACEDH)	