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November 11, 2016

China Development Bank
No. 18 Fuxingmennei Street, Xicheng District
Beijing, P.R.China 100031

C/O: Credit Risk Management Department, Policy Research Department, International Finance
Department, Project Appraisal I and II Department

Re: Environmental and Social Impacts of LNG Development in Yamal Peninsula

Dear Chairman Hu Huaibang:

Warmest greetings from Russia.

As organizations dedicated to environmental protection in Russia, we wish to bring your attention the Yamal LNG project, located in the Arctic region.

We note with satisfaction that the environmental and social impact assessment (ESIA) was conducted in accordance to Russian law and regulations and international standards. However, given the complexity of this project, which includes the construction of a liquid natural gas (LNG) plant, gas pipelines, terminal, shipping channel, natural gas field development, and shipping traffic, we wish to direct your attention to some environmental, social, and cumulative risks and impacts which were not assessed in full.

Currently, the ESIA does not provide sufficient information, analysis, or a comprehensive management plan for addressing the project's significant impacts on biodiversity, fishing, indigenous peoples, and accidents in the Ob river mouth. As you may know, the Ob river is one of the largest river ecosystems on Earth, which spans most of Western Siberia in Russia as well as parts of Kazakhstan, China, and Mongolia.

Unaddressed Environmental and Social Risks in the Yamal LNG project

We have identified key environmental and social risks which unfortunately were not adequately addressed in the Yamal LNG ESIA. These include:

- Impacts from dredging work during the construction period and during the operational stage
- Risks of collision and noise disturbance on marine mammals, and the lack of proper mitigation measures for marine mammals protection
- Hydrocarbons spill response plan for construction and operational stage

- Cumulative environmental impact assessment for shipping activities in Ob river, especially in regards to when other companies begin high risk activities such as shipping and transporting oil and condensate in the Ob river mouth¹
- There is also a need to conduct a cumulative social impact assessment (CSIA) of the Yamal LNG project. This study would assess the social impacts of related and adjacent gas & oil extraction activities on the Yamal Peninsula (both existing and planned), such as climate-induced environmental changes, the impact of the recent massive outbreak of anthrax in reindeer herds, in addition to related policies and regulations constraining nomadic indigenous communities.
- Given the importance of fisheries for population of Ob River basin, as well as the emerging crisis in reindeer herder communities, ensuring independent oversight of the oil & gas industry is extremely urgent in order to prevent any potential accidents or negative impacts. Ensuring independent oversight will also help encourage more open communication among oil & gas companies, local communities, and other concerned stakeholders.²)

As a global financial leader, China Development Bank (CDB) has created environmental policies and tools to help their clients manage environmental and social risks. **In an effort to encourage strong environmental and social compliance from Yamal LNG, we respectfully ask China Development Bank to require your client, Yamal LNG³, to apply international standards and best practices to the development of the Yamal project as a whole, and especially to dredging work and shipping in Ob river mouth.**

We believe that the additional application of international standards to this project will help reduce or mitigate avoidable environmental and social impacts, some of which may cause irreparable harm to the fragile Arctic ecosystem and indigenous communities if left unaddressed. **As such, we ask for further clarity regarding how international standards and best practices will be used to ensure that environmental and social compliance are held to the highest standards.**

We understand that China Development Bank benefits from Chinese government and your own institutional policies to encourage adherence to international norms and standards for overseas investments. As you may know, the 2012 Green Credit Guidelines obligate Chinese banks to comply with “international norms and best practices” when abroad, and the 2009 Guidelines on Corporate Social Responsibility of Financial Institutions ask that Chinese financiers should develop their business plans “in light of international treaties, international practice and industry guidelines”.

Given the involvement of China National Petroleum Company (CNPC) in providing engineering construction⁴ and as a purchaser of LNG⁵, the 2013 Guidelines on Environmental Protection for Foreign Investment and Cooperation “encourage enterprises to research and learn from principles, standards

¹ For more information, please see this independent assessment conducted by WWF Russia.

http://wwf.ru/data/oil/wwf_yamallng_comments-on-eia_final_eng.pdf

² Please find more information from about this from the International Work Group for Indigenous Affairs..

http://www.iwgia.org/news/search-news?news_id=1396 and the Barents observer <http://thebarentsobserver.com/arctic-ecology/2016/08/greenpeace-not-wanted-yamal>.

³ As you are aware, Yamal LNG’s shareholders include: NOVATEK (50.1%), CNPC (20%), Total (20%), and Silk Road Fund (9.9%).

[http://www.novatek.ru/common/tool/stat.php?doc=/common/upload/doc/2016_04_29_press_release_Chinese_banks_FA_\(E_NG\).pdf](http://www.novatek.ru/common/tool/stat.php?doc=/common/upload/doc/2016_04_29_press_release_Chinese_banks_FA_(E_NG).pdf)

⁴ CNPC is a shareholder of Yamal LNG.

<http://www.cnpc.com.cn/en/nr2016/201602/d64e11d3ccb142d6b203477781c6b5f2.shtml>

⁵ http://www.novatek.ru/common/tool/stat.php?doc=/common/upload/doc/YLNG_CNPC_Contract_ENG.pdf

and practices with respect to environmental protection that are adopted by international organizations and multilateral financial institutions”, which include standards such as the Equator Principles⁶.

In that spirit, we included below information on international best practices and standards regarding the aforementioned environmental and social impacts for your consideration, per Chinese government and bank policy.

On Dredging

- OSPAR is an international mechanism by which 15 Governments & the EU have pledged to protect the marine environment and Arctic waters of the North-East Atlantic. OSPAR has developed best practices⁷ in regards to assessing, managing, and reporting dredging activities. OSPAR was established in 1972 after the Oslo Convention to address dumping and was subsequently expanded to include land based sources of dumping after the 1974 Paris Convention⁸.

On Increased Shipping Traffic and Accidents

- The Emergency Prevention, Preparedness and Response Working Group (EPPR)⁹ is a working group of the Arctic Council. It addresses approaches towards the prevention, preparedness, and response to environmental emergencies in the Arctic. Increased shipping traffic and accidents can lead to a rise in oil spills, and so the EPPR has developed an oil spill prevention best practice guide¹⁰.
- The Protection of the Arctic Marine Environment Working Group (PAME) is another working group of the Arctic Council. PAME published the Arctic and Gas Guidelines to reduce the threat of major disasters in Offshore Oil and Gas Operations¹¹.

On Arctic Biodiversity

- Founded in 1993, the Convention on Biological Diversity (CBD) is dedicated to conserving biological diversity, of which Russia is a party. The Convention establishes General Measures for Conservation and Sustainable Use, which requires contracting parties to “Integrate, as far as possible and as appropriate, the conservation and sustainable use of biological diversity into relevant sectoral or cross-sectoral plans, programmes and policies”¹². In a recent Russian national report submitted to CBD, destruction to animal and plant habitats caused by land development such as oil and gas exploration was named as the first major threat to Russian

⁶ The Equator Principles is a voluntary risk management framework developed by the banking sector. It establishes a minimum framework for identifying, managing, and assessing environmental and social risks. The Equator Principles consist of ten principles which banks must consider when approving project finance and certain types of loans. The Principles call for promoting grievance mechanisms, strong loan covenants, and ensuring stakeholder engagement. Although challenges and gaps remain in ensuring the full implementation of the Equator Principles, they remain relevant resource in considering how banks can ensure client compliance in environmentally sensitive projects and have been referenced as positive models in managing environmental and social risk in various Chinese banking policies. For more information, please visit: http://www.banktrack.org/show/pages/equator_principles

⁷ “OSPAR Guidelines for the Management of Dredged Material at Sea”, OSPAR Commission. http://www.magrama.gob.es/es/costas/temas/proteccion-medio-marino/2014-06_OSPAR_DREDGED_MATERIAL_GUIDELINES__2_tcm7-325131.pdf

⁸ “The North East Atlantic”, OSPAR Commission. <http://www.ospar.org/convention/the-north-east-atlantic>

⁹ “About EPPR”, EPPR and Arctic Council. <http://arctic-council.org/eppr/about-eppr/>

¹⁰ “EPPR RP3 Report”, EPPR and Arctic Council. <http://www.arctic-council.org/eppr/wp-content/uploads/2012/08/EPPR-RP3-Best-Practices-report-v3.1-31aug121.pdf>

¹¹ “Arctic Offshore Oil and Gas Guidelines. Systems Safety Management and Safety Culture. Avoiding Major Disasters in Arctic Offshore Oil and Gas Operations”, Arctic Council. <https://oaarchive.arctic-council.org/handle/11374/418>

¹² “Article 6. General Measures for Conservation and Sustainable Use”, Convention on Biological Diversity. <https://www.cbd.int/convention/articles/default.shtml?a=cbd-06>

biodiversity¹³. Furthermore, "increased fragmentation of tundra and forest-tundra in the areas of oil and gas exploitation in the ... Yamalo-Nenets" autonomous district was named as a negative trend impacting Russian diversity¹⁴. The Yamal Peninsula is located in Yamalo Nenets autonomous district.

- The Conservation of Arctic of Flora and Fauna (CAFF) is another working group of the Arctic Council. It provides recommendations on the conservation and management of biodiversity associated with sea ice¹⁵.

On Indigenous Peoples' Livelihoods and Culture

The rights of indigenous peoples' livelihoods and culture are enshrined in the United Nations Declaration On The Rights Of Indigenous Peoples. A variety of international norms and instruments have been created to further recognize and protect indigenous peoples' rights to livelihoods and culture, such as the 2012 IFC Performance Standard on Indigenous Peoples, the United Nations Global Compact, the Note by the Secretary-General on the report of the Working Group on the issue of human rights and transnational corporations and other business enterprises¹⁶. These documents represent best available practices and standards in regards to acknowledging and upholding the rights of indigenous peoples. These include:

- Providing indigenous peoples full disclosure regarding ongoing or planned extractive operations. This disclosure should also include information on the sourcing of raw materials by companies from regions inhabited by indigenous peoples
- Project developers should develop mechanisms of direct engagement with indigenous peoples and their representatives; importantly, direct engagement between indigenous peoples and project developers should not be restricted to indigenous peoples' organizations recognized or supported by the state
- Project developers should identify all potentially affected indigenous peoples and communities, with special attention to those whose customary land rights and tenure systems are not recognized by the state
- Free, Prior and Informed Consent is a "the principle that a community has the right to give or withhold its consent to proposed projects that may affect the lands they customarily own, occupy or otherwise use"¹⁷. It should be understood as a permanent process of constructive engagement and relationship-building between indigenous peoples and the given business enterprises throughout the entire lifetime of a given project. These documents make clear that it should not be considered as a one-off exercise
- Project developers should conduct adequate due diligence in order to ensure that the extraction or sourcing of raw materials from territories of indigenous people is followed by proper clean-up, restoration, and industrial/mine legacy management. This also includes ensuring that the territories are left in adequate condition after the project's lifetime has ended.

¹³ "CBD Fifth National Report - Russian Federation (English version)", Convention on Biological Diversity. <https://www.cbd.int/doc/world/ru/ru-nr-05-en.pdf>

¹⁴ Ibid.

¹⁵ "Sea Ice Associated Biodiversity Recommendations", Conservation of Arctic Flora and Fauna. <http://www.caff.is/index.php/sea-ice-associated-biodiversity/findings#damage>

¹⁶ "Human rights and transnational corporations and other business enterprises. Note by the Secretary-General", UN General Assembly. <http://www.un.org/Docs/journal/asp/ws.asp?m=A/68/279>

¹⁷ "Free, prior and informed consent (FPIC)", Forest People's Programme. <http://www.forestpeoples.org/guiding-principles/free-prior-and-informed-consent-fpic>

- Grievance mechanisms should be instituted and in compliance with the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights (Principles 29-31). In particular, they should ensure that indigenous peoples have complete and accessible information on grievance mechanisms and that these mechanisms fully respect their cultures, traditional norms and customary law. Although not yet fully incorporated into international standards on the rights of indigenous peoples, project developers should consider establishing benefit sharing mechanisms for peoples affected by resource extraction, as proposed by the UN Special Rapporteur on the Right of Indigenous Peoples in the report dated 19 July 2010 (UN Doc A/HRC/15/37, para 76-80)¹⁸

We appreciate your time and consideration in understanding our concerns. For your reference, we attach the China Banking Regulatory Commission’s Key Performance Indicators on the Green Credit Guidelines, and have noted areas where we hope your staff can provide more information, such as whether this project is classified as Category A, or if a social stability assessment has been conducted, etc.

We suggest that your substantive response to our inquiry be directed to the e-mail addresses of our team below and to this postal address in Russia: Moscow. 125139-, Krasnoarmeiskaya Street 27 - 3

If more convenient, we also would be pleased to meet you at your branch in Russia and share our perspective on how international standards and best practices can be used to enrich the environmental and social compliance of this project. We believe this project can demonstrate how Russian and Chinese organizations can positively partner together. In order to ensure that our letter was duly received, please confirm receipt of this letter by December 1, 2016.

We welcome a proactive and productive partnership with China Development Bank and other Chinese stakeholders.

Sincerely, 
Eugene Simonov, Coordinator.

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This letter is also supported and co-signed by Russian national environmental groups:

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¹⁸ “Report by the Special Rapporteur on the situation of human rights and fundamental freedoms of indigenous people, James Anaya”, Human Rights Council. <http://www2.ohchr.org/english/bodies/hrcouncil/docs/15session/A.HRC.15.37.Add.1.pdf>

2016年11月11日

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事由：亚马尔半岛液化天然气开发的环境和社会影响

尊敬的胡董事长：

请接受来自俄罗斯的亲切问候！

我们代表俄罗斯的环保组织给您写信，请您关注位于北极地区的亚马尔液化天然气项目。

我们欣慰地注意到，该项目按照俄罗斯法规和国际准则进行了环境和社会影响评价。然而，该项目包含兴建一个液化天然气厂、燃气管道、码头、航道以及天然气田开发，鉴于其复杂性，我们想提醒您关注一些未充分评估的环境、社会以及累积风险和影响。

目前的环境和社会影响评价未提供足够信息、分析或综合管理计划应对该项目对生物多样性、渔业和土著居民的重大影响，以及鄂毕河口可能发生的事故。如您所知，鄂毕河是地球上最大的河流生态系统之一，跨越俄罗斯西西伯利亚大部，以及哈萨克斯坦、中国和蒙古部分地区。

亚马尔液化天然气项目未解决的环境和社会风险

遗憾的是，我们找出了亚马尔液化天然气项目尚未充分解决的关键环境和社会风险，包括：

- 施工和运营阶段疏浚作业造成的影响
- 碰撞风险和噪音对海洋动物的干扰，以及缺乏保护海洋哺乳动物的缓解措施
- 建设和运营阶段碳氢化合物泄漏事故应急预案
- 鄂毕河航运活动的累积环境影响评价，尤其是当其他公司在鄂毕河口开始运油和凝析等高风险活动时。¹⁹
- 亦有必要评估亚马尔液化天然气项目的累积社会影响。此项研究将评估亚马尔半岛天然气和石油开采活动（包括现有和规划中的）的环境与社会影响，如气候引发的环境变化、近期大规模爆发的驯鹿炭疽，以及限制土著游牧社区的相关政策和法规。
- 鉴于渔业对鄂毕河流域居民的重要性，以及驯鹿牧民社区新出现的危机，确保油气行业的独立监督以防止潜在事故或负面影响迫在眉睫。确保独立监督亦有助于鼓励油气公司与当地社区以及其他利益相关者之间更开放的沟通。

作为全球金融领导者，贵行设立了环境政策和工具帮助客户管理环境和社会风险。为促进亚马尔液化天然气项目环境与社会合规，我们恳请贵行要求该客户全面采纳国际标准和良好做法，尤其是当涉及鄂毕河口的疏浚和航运时。

¹⁹ For more information, please see this independent assessment conducted by WWF Russia.
http://wwf.ru/data/oil/wwf_yamallng_comments-on-eia_final_eng.pdf

我们认为，将国际标准应用于该项目有助于减少或减轻可以避免的环境和社会影响。否则，其中一些影响如置之不理，可能会对北极脆弱的生态系统造成无法弥补的伤害。**我们想了解清楚，该项目将如何运用国际标准和良好做法确保其环境与社会合规臻于至善。**

据我们所知，国开行获益于中国政府以及本行鼓励海外投资遵循国际规范和标准的政策。如您所知，2012年发布的《绿色信贷指引》责成中资银行在境外遵循“国际惯例和良好做法”；2009年发布的《中国银行业金融机构企业社会责任指引》要求中国金融机构应“参照国际条约、国际惯例和行业准则制订经营战略。”

中国石油天然气集团公司（CNPC）参与工程建设²⁰并购买液化天然气²¹。2013年发布的《对外投资合作环境保护指南》“鼓励企业研究和借鉴国际组织、多边金融机构采用的有关环境保护的原则、标准和惯例。”，如《赤道原则》²²。

故此，我们依据中国政府和银行政策，将有关前述环境和社会影响的国际良好做法和标准的信息附录于下，供您参考。

关于疏浚

- 《保护东北大西洋海洋环境公约》（OSPAR）是一个国际机制，15国政府和欧盟共同承诺保护东北大西洋和北极海域的海洋环境。《保护东北大西洋海洋环境公约》制定了有关疏浚活动评估、管理和报告的良好做法。²³《保护东北大西洋海洋环境公约》始于1972年，当年通过了防止飞机和船舶倾倒废物污染海洋的《奥斯陆公约》。1974年，《巴黎公约》将范围扩宽至源于陆地的废物。（译注：1992年，这两个公约被合并为《保护东北大西洋海洋环境公约》）²⁴。

关于航运和事故增多

- 突发事件预防、准备和响应工作组（EPPR）²⁵是北极理事会下属的工作组。该工作组制定预防、准备和响应北极地区环境突发事件的方法。航运和事故增多会导致漏油攀升，因此该工作组制定了《预防漏油良好做法指南》²⁶。
- 保护北极海洋环境工作组（PAME）是北极理事会的另一个工作组。该工作组发布了《北极石油与天然气行业管理指南》，以减少海上石油和天然气作业重大灾难的威胁²⁷。

²⁰ CNPC is a shareholder of Yamal LNG.

<http://www.cnpc.com.cn/en/nr2016/201602/d64e11d3ccb142d6b203477781c6b5f2.shtml>

²¹ http://www.novatek.ru/common/tool/stat.php?doc=/common/upload/doc/YLNG_CNPC_Contract_ENG.pdf

²² The Equator Principles is a voluntary risk management framework developed by the banking sector.

It establishes a minimum framework for identifying, managing, and assessing environmental and social risks. The Equator Principles consist of ten principles which banks must consider when approving project finance and certain types of loans. The Principles call for promoting grievance mechanisms, strong loan covenants, and ensuring stakeholder engagement. Although challenges and gaps remain in ensuring the full implementation of the Equator Principles, they remain relevant resource in considering how banks can ensure client compliance in environmentally sensitive projects and have been referenced as positive models in managing environmental and social risk in various Chinese banking policies. For more information, please visit: http://www.banktrack.org/show/pages/equator_principles

²³ “OSPAR Guidelines for the Management of Dredged Material at Sea”, OSPAR Commission.

http://www.magrama.gob.es/es/costas/temas/proteccion-medio-marino/2014-06_OSPAR_DREDGED_MATERIAL_GUIDELINES__2_tcm7-325131.pdf

²⁴ “The North East Atlantic”, OSPAR Commission. <http://www.ospar.org/convention/the-north-east-atlantic>

²⁵ “About EPPR”, EPPR and Arctic Council. <http://arctic-council.org/eppr/about-eppr/>

²⁶ “EPPR RP3 Report”, EPPR and Arctic Council. <http://www.arctic-council.org/eppr/wp-content/uploads/2012/08/EPPR-RP3-Best-Practices-report-v3.1-31aug121.pdf>

关于北极生物多样性

- 致力于保护生物多样性的《生物多样性公约》（CBD）成立于 1993 年，俄罗斯是成员国之一。《生物多样性公约》规定了保护和可持续利用的一般措施，要求缔约方“尽可能并酌情将生物多样性的保护和持久使用订入有关的部门或跨部门计划、方案和政策内”²⁸。俄罗斯最近提交给《生物多样性公约》的国家报告指出，石油和天然气勘探等土地开发破坏动植物栖息地是俄罗斯生物多样性的面临的首要威胁。此外，“亚马尔-涅涅茨”自治区石油和天然气开采地区的苔原和森林苔原碎片化加剧亦影响到俄罗斯的生物多样性。亚马尔半岛位于亚马尔-涅涅茨自治区。2930
- 北极动植物保育工作组（CAFF）亦是北极理事会下属工作组。该工作组就涉及海冰的生物多样性保育和管理提供建议³¹。

关于土著居民的生计和文化

土著人民的生计和文化权利载入了《联合国土著人民权利宣言》。旨在进一步承认和保护土著人民的生计和文化权利的多种国际规范和工具已经设立，如[国际金融公司有关土著人民的绩效标准（2012 年）](#)、《联合国全球契约》，以及联合国秘书长关于人权与跨国公司和其他商业企业问题工作组报告的批注³²。这些文件代表了现有的承认和维护土著人民权利的良好做法和准则，包括：

- 向土著人民充分披露正在进行或计划之中的采掘作业。披露亦应包括公司从土著人民居住地区采购原材料的信息。
- 项目开发商应制定与土著人民及其代表直接接洽的机制。重要的是，这种接触不应仅限于国家认可或支持的土著民间组织。
- 项目开发商应找出所有可能受影响的土著人民和社区，特别需注意那些习惯性土地权和权属制度不被国家认可的。
- 自由、事先和知情同意原则，即“一个社区有权同意或拒绝可能影响他们习惯性拥有、占据或使用的土地的拟建项目。此举应被理解为在整个项目周期中企业与土著人民进行建设性接洽和发展关系的持续过程。这些文件阐明，与土著人民接洽不应被视为一劳永逸的举动。
- 项目开发商应进行充分的尽职调查，以确保从土著人民的领地采掘或采购原材料后，将进行适当的清理、修复和工业/矿山遗产管理。这也包括确保领地项目生命周期结束后仍保持适宜状况。
- 应制定申诉机制，并遵守载于《联合国商业和人权指南》（原则 29-31）的有效性标准。尤其是，应确保土著人民可获得关于申诉机制的完整信息，并且这些机制充分尊重他们的文化、传统规范和习惯法。虽然尚未完全纳入关于土著人民权利的国际标准，项目开发商

²⁷ “Arctic Offshore Oil and Gas Guidelines. Systems Safety Management and Safety Culture. Avoiding Major Disasters in Arctic Offshore Oil and Gas Operations”, Arctic Council. <https://oarchive.arctic-council.org/handle/11374/418>

²⁸ “Article 6. General Measures for Conservation and Sustainable Use”, Convention on Biological Diversity. <https://www.cbd.int/convention/articles/default.shtml?a=cbd-06>

²⁹ “CBD Fifth National Report - Russian Federation (English version)”, Convention on Biological Diversity. <https://www.cbd.int/doc/world/ru/ru-nr-05-en.pdf>

³⁰ Ibid.

³¹ “Sea Ice Associated Biodiversity Recommendations”, Conservation of Arctic Flora and Fauna. <http://www.caff.is/index.php/sea-ice-associated-biodiversity/findings#damage>

³² “Human rights and transnational corporations and other business enterprises. Note by the Secretary-General”, UN General Assembly. <http://www.un.org/Docs/journal/asp/ws.asp?m=A/68/279>

应考虑为受资源开采影响的人群建立利益分享机制，如联合国土著人民权利问题专员在 2010 年 7 月 19 日的报告（联合国文件 A/HRC/15/37，第 76-80 段）中所提议的。³³

感谢您费心了解我们关切的问题。随信附上中国银监会《绿色信贷指引关键绩效指标》，供您参考。我们标注了希望您的员工可以提供更多的信息的事项，例如该项目是否被归为 A 类，是否完成了社会稳定评估，等等。

请您将针对我们询问的实质性答复发送到下述电邮地址，并同时邮寄到我们在俄罗斯的地址：
Moscow 125139-, Krasnoarmeiskaya Street 27 - 3

如果于您更方便，我们也很乐意在贵公司的俄罗斯分公司与您会晤，并就如何将国际准则和良好做法运用于该项目以促进其环境与社会合规分享我们的观点。我们相信，该项目可以展示俄中两国机构如何能够积极合作。为确保您收悉此信，请于 2016 年 12 月 1 日前回函确认。

我们期待与贵行和其他中国利益相关方建立积极而富有成效的伙伴关系。

您诚挚的，

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³³ “Report by the Special Rapporteur on the situation of human rights and fundamental freedoms of indigenous people, James Anaya”, Human Rights Council. <http://www2.ohchr.org/english/bodies/hrcouncil/docs/15session/A.HRC.15.37.Add.1.pdf>