



**Centre for Environmental Law and Community Rights, Inc.
Friends of the Earth Papua New Guinea**

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28th October 2026

OPEN LETTER

ExxonMobil Corporation

22777 Springwoods Village Parkway,
Spring, TX 77389-1425, USA

Attention: ExxonMobil PNG Limited
Jacksons Parade
PO Box 118,
Port Moresby NCD,
Papua New Guinea

Dear Sir/Madam,

Subject: Notice of unresolved concerns and request for immediate response on issues of landowner rights, transparency, environmental protection, climate change and human rights

We refer to the above subject matter.

The Centre for Environmental Law and Community Rights (CELCOR) Inc is a PNG based public interest not for profit environmental law firm. CELCOR's mission is to promote and defend environmental and customary (indigenous) rights. CELCOR hereby puts ExxonMobil and its subsidiary ExxonMobil PNG Limited on notice of the concerns outlined below. With Exxon Mobil assuming the operator role of the proposed Papua LNG project dated September 15 as [reported](https://www.postcourier.com.pg/exxonmobil-to-become-operator-of-papua-lng/)¹ in Post Courier. The change does not remove the new operator from resolving the concerns or grievances from traditional owners.

¹ <https://www.postcourier.com.pg/exxonmobil-to-become-operator-of-papua-lng/>

1. Flawed Consultation or FPIC

The customary landowners of the project have reported flaws in the consultation or what is deemed Free, Prior, Informed Consent (FPIC) process for the Papua LNG Project.

The [report](#)² states that on July 13th eleven (11) wellhead communities where the gas will be extracted, have formally advised the project developer that they have *withdrawn their Free, Prior, and Informed Consent (FPIC)*. According to media reporting, the Elk Antelope Gas Project Area Landowner Association Inc. (EAGPALA) has publicly claimed that the existing FPIC process conducted on behalf of the project operator “*was flawed, legally defective, and failed to adequately protect the rights of customary landowners.*” Consequently, customary landowners are calling for a new, independently overseen FPIC process and an official investigation into the consulting entities involved.

CELCOR is yet to confirm evidence of an FPIC document by the company that shows that FPIC is conducted in accordance with FPIC standards as defined under international human rights law. Consultations are conducted without full disclosure of potential long-term environmental and social impacts. Under international standards FPIC is a continuous process requirement and not a one-off procedural checkbox.

The call for renewed FPIC by the Elk Antelope Gas Project Area Landowners must be respected and independently overseen. To date, there has been no formal response by Total Energies E&P PNG and the National Government. When consent is withdrawn the customary rights must be respected as reflected in the 4th and 5th National Goals and Directive Principles of Papua New Guinea³ and the same is reaffirmed under the UN Declaration on the Rights of Indigenous People specifically articles 19 and 32⁴, which require States to consult and cooperate in good faith with Indigenous Peoples in order to obtain their free, prior and informed consent before approving projects affecting their lands, territories, and resources.

2. Landowners left out and project document remain secret

Concerns have persisted for months, if not years that certain clans have been excluded from the processes of *social mapping and landowner identification*. Pursuant to Section 47 of the *Oil and Gas Act 1998*⁵, the conduct of social mapping studies is the condition to the granting of a petroleum prospecting license. These studies are undertaken by the project developer.

Following completion, the State undertakes verification through *Landowner Beneficiary Identification*, a field-based process to confirm the accuracy of the developer’s study. On the basis of the verified social mapping and vetting reports, the Minister for Petroleum issues and gazettes a formal *Ministerial Determination*. The names of the duly recognized landowners are published in the *Ministerial Declaration*.

² <https://www.facebook.com/share/p/1CryJoyZZS/>

³ Constitution of the Independent State of Papua New Guinea, 1975

⁴ United Nations. (2007). United Nations Declaration on the Rights of Indigenous Peoples. United Nations. https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf Retrieved October 7, 2026

⁵ Oil and Gas Act 1998, Papua New Guinea

The Member of Parliament for Kikori District, Gulf Province and Minister for Provincial and Local Level Government Affairs [Hon. Soroj Eoe](#) ⁶ has formally voiced serious concerns that customary landowners were *not adequately included or recognized in early social mapping studies*. Similar concerns were raised on behalf of landowners in Central Province during the Development Forum by the [Governor for Central Province](#) ⁷.

Media [report](#) of Kairuku Papua LNG Offshore Pipeline Holdings Limited reinforces concerns that large groups of rightful customary landowners have been left out during the social mapping and landowner identification. The call was for the National Petroleum Authority to include 26 coastal clans from five villages. The appeal was made to the minister to review the Ministerial Determination.

Adding to these grievances, the [Moripi](#) tribe of Gulf Province remains unacknowledged as official landowners, despite the Papua LNG pipeline crossing 80 kilometers of their customary fishing grounds. Having already observed a sharp decline in rock lobster catches following past PNG LNG operations, the tribe fears the new pipeline will cause further environmental and economic harm to their livelihoods.

Moreover, Joseph Ka'au, ([see interview here](#)) the leader of the Kaimare Tribe in the Purari Delta, has asked the government to delay the Development Forum. This forum is meant to decide how royalties and the development of levy will be shared. He believes the meeting should not go ahead until the traditional landowners of the Purari Delta clearly understand the impacts of the project's waste disposal regime.

Mr. Ka'au pointed out that the landowners know the environment permit allows waste to be released into the Purari River. However, the permit itself has never been made available for the public to see or review. Noting that;

“Without access to the permit, the people of the Purari Delta cannot know precisely what has been authorized, what monitoring will occur, or what safeguards are in place to protect our river system. If this environmental permit is implemented and the project proceeds, it could be a catastrophe for our environment and threaten the future of my people.”

Therefore, these challenges, social mapping and landowner identification documents remain classified as secret, alongside numerous critical public documents required that includes;

1. The full Environment Permit and its terms and conditions
2. Precise locations and routes of key project infrastructure
3. Resettlement plans
4. Upstream decommissioning plans
5. Climate change risk assessment
6. Economic modelling
7. Full Human Rights Impact Assessment

The review of project baseline documentation shows a clear gap in the estimated number of people affected. The initial Upstream & Midstream Environmental Impact Statement counted only 12,700 individuals. However, in July, the PNG Government Development Proposal stated that the upstream and midstream would impact 45,082 people. This is a figure 350% higher. In total, the PNG government has stated that the project will impact over 63,000

⁶ <https://www.thenational.com.pg/social-mapping-poses-issue-to-png-lng-project-says-mp/>

⁷ <https://thepngbulletin.com/news/central-province-seeks-fair-deal-at-papua-lng-development-forum/>

people, covering over 220+ customary clans in Gulf and Central Provinces. This means the first assessments underestimated the affected population by over 30,000 people. Such a large oversight raises serious concerns about whether developers and proponents are engaging with the right customary representatives or leaving out legitimate landholding groups. It also raises questions as to why this did not trigger requirements for the project to redo relevant sections of its environmental impact assessments to reflect these 30,000+ people and seek new public consultation.

Furthermore, the Director's Proposal submitted pursuant to Section 54 of the Oil and Gas Act 1998⁸ for the Development Forum relies on economic modelling from a February 2025 document that also appear to be kept secret. We are concerned that the royalty and development levy figures may have been taken from a document called "OBEM 14022025 Best Case". A "best case" document usually shows the most favourable outcome, not the most likely or expected outcome. If these figures are being used to explain expected benefits to landowners, the assumptions behind them should be disclosed and checked. Without access to this information, communities and independent experts cannot properly assess the figures, the benefit-sharing arrangements, or the basis for project approvals. It may also be perceived as misleading. This undermines public confidence in the project.

3. Risk to biodiversity

The Papua LNG footprint will pass through densely forested landscapes, fragile ecosystem, floodplains and mangrove covered coastlines. The project area of influence includes 27 terrestrial species already at threat of extinction. The project area covers 100 new-to-external science or undescribed-by-external science species⁹. If external scientists have never studied a species, then potential risks cannot be accurately understood, let alone mitigated. These species have never been assessed to determine if they are threatened, requiring more protections. Several species are range restricted, endemic or migratory. The sheer volume of undescribed species or new-to-external science species raises questions about how the project can meet the need to protect the ecological value that support critical habitat for threatened species. The project's own advisory panel has raised concern that efforts are insufficient to meet IFC PS 6, including the lack of independent species assessments¹⁰.

An initial Upstream EIS baseline study saw experts deeply concerned about the presence of the Bulmer's Fruit Bat in the project area of influence one of the world's 100 most endangered species¹¹, with, at last assessment, only 137-160 known adults¹².

⁸ Oil and Gas Act 1998 Papua New Guinea

⁹ The Upstream EIS (2019) highlighted that there were 48 new-to-science species and 15 undescribed by science species. The Upstream EIS Addendum then found additional species, bringing the total to 100 new-to-science and undescribed by science species. Total E&P PNG Ltd (2019) Chapter 7 – Existing Environment – Terrestrial. Volume 1, Main report. Papua LNG Upstream Environmental Impact Statement. p. 7-91.

¹⁰ Papua LNG (n.d.) Eighth meeting of the Independent Advisory Panel, Papua LNG (n.d.) website. Available at:

<https://papualng.com.pg/2025/08/panel-8-october-7-11-2024/> Accessed 20 September 2026.

¹¹ Total E&P PNG Ltd (2019) Annex 3: Upstream Bats (Chiroptera) Baseline Study Report, in Part 6: Upstream Terrestrial Biodiversity Baseline Report, Volume 2: Environmental and Social Baseline Studies,

It is both critically endangered and nationally protected. However, in the Upstream EIS Addendum there was a single sentence stating that it was removed from the sensitive species list as it was ‘unlikely’ to be in the area it provided no further studies or evidence, and did not even state who had concluded this¹³

These extend to marine and coastal ecosystems. The two internationally recognised sites; Kikori Delta Important Marine Mammal Area (IMMA) for its resident populations of Australian snubfin and Australian humpback dolphins, both classified as vulnerable, and for feeding and reproductive habitats that supports them. Similarly, the Gulf of Papua Mangrove Delta Important Shark and Ray Area (ISRA) for supporting threatened sharks and rays, including critically endangered largetooth sawfish and river sharks, and for providing important reproductive habitats.

4. Climate Change risks

The Papua LNG project in its 25 years of operational lifespan will emit 220 million metric tons of Carbon dioxide the size of Bangladesh. PNG is one of the most climate-impacted countries on the planet¹⁴ already some households in the coastal areas of Gulf province have had to relocate due to sea level rise and more violent storms.¹⁵

The report by International Energy Agency (IEA)¹⁶ states that achieving net-zero emissions by 2050 requires a sharp decline in oil and gas use, with no new gas projects approved for development. The report also notes that future LNG demand in this pathway can be met by export plants already in operation. These findings raise important questions about the need for new LNG projects and their compatibility with global climate goals. Pacific communities already face severe climate impacts and should not bear additional risks that have not been properly assessed

These broader concerns are documented in the 60+-page Equator Principles complaint submitted by CELCOR and five other civil society organizations. That complaint asserts non-compliance with six of the ten Equator Principles and at least four IFC Performance Standards.

We hereby notify ExxonMobil of these unresolved concerns and urge ExxonMobil to provide clear information on these issues.

Main report, Upstream Environmental Impact Statement, Papua LNG Project Upstream Environmental Impact Statement, p.47.

¹² IUCN Red List (n.d.) Bulmer’s Fruit Bat (*Aproteles bulmerae*). Available at:

<https://www.iucnredlist.org/species/1933/209536462> Accessed 20 September 2026.

¹³ TotalEnergies EP PNG Ltd (2024). Papua LNG Upstream Environmental Impact Assessment PRL-15 Addendum. p.10-23.

¹⁴ For example, The Notre Dame Global Adaptation Initiative (ND-GAIN) index ranks PNG 167th out of 187 countries in its resilience to climate impacts, with PNG’s vulnerability to climate threats high and its readiness to address them as low. Notre Dame Global Adaptation Initiative (n.d.) ‘Country rankings: Scores for 2023’. Available at: <https://gain.nd.edu/our-work/country-index/rankings/> Accessed 1 October 2026.

¹⁵ Veraibari community (2022) ‘Submission to the UN Special Rapporteur on Climate Change, <https://www.studocu.vn/vn/document/hoc-vien-ngoai-giao-viet-nam/not-listed/icj-case-study-climate-victims-voices-from-veraibari-png/157174435> Accessed October 6, 2026

¹⁶ International Energy Agency. (2023). Oil and gas in net zero transitions. In The oil and gas industry in net zero transitions. <https://www.iea.org/reports/the-oil-and-gas-industry-in-net-zero-transitions/oil-and-gas-in-net-zero-transitions> , Accessed October 6, 2026

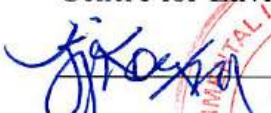
We also specifically request for ExxonMobil to:

1. **Publicly release the standardized MOU on Free, Prior and Informed Consent that the project has requested clans to sign.** This is necessary to understand if the MOU fully respects landowner rights or if it may include conditions contrary to the upholding of those rights.
2. **Publicly state if the project intends to reach a Final Investment Decision *without* having secured the Free, Prior and Informed Consent of the wellhead clans, or all of the affected clans.** NGOs have profound concerns if the project plans to move ahead without the permission of the landowners on whose very lands and waters it will rely.
3. **Publicly state what actions ExxonMobil will take in response to the concerns raised by many clans about the landowner identification process.** As highlighted, a significant number of clans have made formal requests or advisories to the government about oversights or inaccuracies that have not recognised some clan's rights.
4. **Publicly release all relevant documents necessary for clans and other affected people to understand the project and its potential risks or impacts.** Clans cannot provide "informed" consent if basic information about the project is not publicly known or communicated.
5. **Publicly clarify whether and how Kikori Delta Important Marine Mammal Area (IMMA) and Gulf of Papua Mangrove Delta Important Shark and Ray Area (ISRA),** their qualifying species and habitats, have been considered in the project's environmental impact assessments, including proposed mitigation, monitoring and safeguards consistent with IFC Performance Standard 6.

We request a written response within 30 days of receipt of this letter.

Yours faithfully,

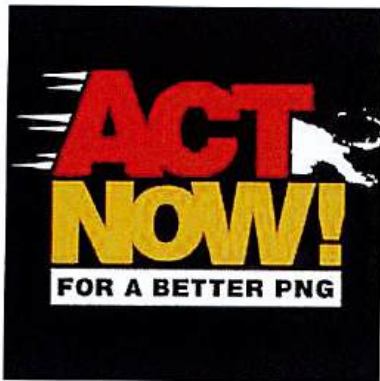
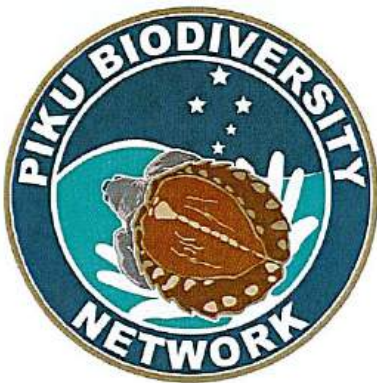
Centre for Environmental Law and Community Rights (CELCOR) Inc.


Peter Bosip (Mr)

Executive Director



Endorsed by the following civil society organisations in Papua New Guinea;



Research and Conservation
Foundation of PNG (RCF)



WBCA

Wide Bay Conservation Association Inc: