



Blood Money
Campaign Myanmar



Mr. Michael Wirth
Chief Executive Officer
Chevron Corporation

19 December 2023

Dear Michael Wirth

Is Chevron helping the Myanmar military junta evade U.S. sanctions?

In February 2021, the Myanmar military launched a coup d'état to overthrow the Government of Myanmar (Burma). Although the military failed in establishing itself as a new or recognized Government of Myanmar, it has continued to hold key government institutions hostage while illegally misappropriating funds. This includes misappropriation of revenues owed to the Myanmar Government from offshore gas projects in which Chevron has a stake and which are paid via the Myanmar Oil and Gas Enterprise (MOGE). Since February 2021, despite stating that it would exit, Chevron's shareholding has increased. Each month, millions of dollars ultimately owed by Chevron to the Myanmar state are transferred to MOGE accounts controlled by the junta.

As of 15 December 2023, the grace period for [partial U.S. sanctions](#) on MOGE expire and U.S. persons are prohibited from providing "financial services" to MOGE. These measures are intended to prevent U.S. correspondent banks from enabling transactions that the U.S. Government describes as "the largest single source of foreign revenue for Burma's military regime." The junta can use this revenue to fund its continuing atrocities, including airstrikes on civilians, with reports indicating that some of the jet fuel for these strikes has been [sold by Chevron](#).

We are writing to assess the extent to which Chevron is assisting in efforts by the military junta or your joint venture partners to circumvent these sanctions. In particular, the original contracts for the Yadana gas project specify that revenue payments to MOGE must be made in U.S. dollars. We are concerned about efforts to change these payments to a different currency with the intent to circumvent U.S. sanctions. This could only be changed if Chevron, the largest shareholder in the joint venture, agrees to such changes.

Consistent with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, Chevron has a responsibility to use its leverage to ensure that it is not contributing or directly linked to human rights abuses. We ask for confirmation that Chevron has not and will not agree to a currency change.

Given Chevron's ongoing presence in Myanmar, we request that you provide responses to the questions below. We intend to raise our concerns that Chevron is continuing to contribute to human rights abuses in Myanmar, has failed to use its leverage to reduce these



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contributions and justified this with reliance on disinformation with your shareholders and will suggest they raise the same questions with you directly.

1. In January 2022, Chevron announced that it planned to exit Myanmar and in May 2023 Chevron publicly stated that the sale of its interest to Yadana was expected to complete in 2023.
 - When does Chevron now expect the sale to complete?
 - Is MTI Energy still the buyer?
2. Under the Yadana contracts disclosed in prior litigation, all revenue payments and dividends under the Yadana project must be made in U.S. dollars. Chevron's interest and shareholding means that Chevron's consent is required for any change in currency. If Chevron gives such consent, it will be easier for the Myanmar military junta to avoid recent US sanctions.
 - Has Chevron already approved a currency change?
 - If not, will Chevron refuse to provide consent to any future, proposed currency changes?
 - How has Chevron used its leverage to ensure that the buyer of its interest in Yadana will not consent to such currency changes?
 - If Chevron has approved a currency change, or failed to prevent the buyer from doing so, how is this consistent with Chevron's responsibilities under the UN Guiding Principles and OECD Guidelines?
3. Chevron's sale to MTI Energy requires the approval of the Government of Myanmar. TotalEnergies has also confirmed that certain payments from PTT to MOGE, a government agency, [reflect sums owed by investors](#), including Chevron, to this government agency. In January 2023, the UN Special Rapporteur on the Human Rights Situation in Myanmar concluded that the Myanmar military junta was [not the Government of Myanmar](#). Likewise, the United States does not recognize the junta as the country's government. A recent increase in conflict in Myanmar has reduced the limited areas in Myanmar over which the junta has control, further demonstrating that the junta is not the de facto government under international law.
 - On what basis has Chevron determined that the junta is able to act as the Government of Myanmar and accept revenue payments?
 - On what basis has Chevron determined that the junta is able to act as the Government of Myanmar and approve the sale of Chevron's interests?
 - Why did Chevron consider it was best placed to make these determinations rather than referring the matter to international arbitration under its contracts?
4. Chevron has withheld consent for dividend payments to the shareholders of the Moattama Gas Pipeline Company (MGTC), which operates the Yadana pipeline. This appears to have prevented millions of dollars reaching the junta and is a



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positive step, although it only stops a small proportion of the revenues reaching the junta.

- What additional steps is Chevron taking to ensure that these sums do not reach the junta after it sells its interest in Yadana?
 - How has Chevron used its leverage to ensure that the terms of the sale preclude the buyer from approving such payments?
5. In September 2023, EarthRights International and a Myanmar CSO filed an [OECD complaint](#) with the OECD National Contact Points in the UK and Canada against MTI Energy.
- Has Chevron reviewed this complaint?
 - The breaches of the OECD Guidelines alleged in the complaint also apply to Chevron. Please confirm which alleged breaches you consider to be incorrect and why.

Yours sincerely

The Blood Money Campaign



We are a group of social and political activists, student union and pro-democracy supporters who want to fight against the military junta and its oppressions. We believe that cutting off the financial resources for the military junta will weaken one of its sources of power and prevent its crimes against humanity and hence, become one strategic way in restoring democracy in Myanmar!

Kirk Herbertson
Senior Policy Advisor, EarthRights International

