

The Corner House

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Dorset DT10 2AL.

Mr. Peter Voicke
International Finance Corporation
2121 Pennsylvania Avenue, NW
Washington, DC 20433
USA

5th May 2003

Dear Mr. Voicke,

BTC CONSORTIUM: COMPLAINT UNDER OECD GUIDELINES

Please find attached a Complaint that a number of NGOs have submitted against BP to the UK National Contact Point for the OECD Guidelines on Multinational Enterprises. Complaints have also been lodged against the French, German, Italian, and U.S. companies involved.

The Complaint focuses on the legal agreements that underpin the Baku-Tbilisi-Ceyhan (BTC) project, for which BP has said the Consortium will be approaching the IFC for support. The complaint contends that the Consortium has breached the Guidelines by:

- exerting undue influence over the regulatory framework for the project;
- seeking or accepting exemptions related to social, labor, tax and environmental laws;
- pressurising the Georgian environment minister to approve the Environmental Impact Assessment (EIA) despite the minister's protests that the EIA violates Georgian law; and
- undermining the host governments' ability to mitigate serious threats to the environment, human health and safety by, among other actions, negotiating agreements that free the pipeline project from any environmental, public health or other laws that the three host countries might adopt in the future.

Other concerns highlighted in the complaint include failure to adequately consult with project-affected communities and failure to operate in a manner contributing to goals of sustainable development.

Given the BTC Consortium's wish to obtain support from the IFC for the BTC pipeline, we would request that you ensure that the Complaint is given full consideration in the IFC's due diligence for the project.

I look forward to hearing from you,

With Best Wishes

Nicholas Hildyard
The Corner House