

February 25, 2026

Submitted to:

Mikio Okumura
Group CEO, President and Representative Executive Officer
SOMPO Holdings, Inc.
26-1, Nishi-Shinjuku 1
Shinjuku-ku, Tokyo, 160-8338
Japan

Subject: Human rights abuses associated with SOMPO's business relationship with Venture Global (Calcasieu Pass LNG and CP2)

Dear Mr. Okumura,

We wish to formally express our profound concerns regarding the ongoing violations of SOMPO's Policy for Human Rights and the attendant financial and reputational risks arising from business dealings with your client, Venture Global, specifically in relation to the Calcasieu Pass LNG terminal and its associated CP2 LNG terminal, currently under construction.

As stakeholders and representatives of the local communities directly impacted by SOMPO's operations through its partnership with Venture Global, as well as allied international non-governmental organizations, we hereby submit this letter.

Our research¹ has revealed that SOMPO's subsidiary, Endurance Worldwide Insurance, holds 5% of a \$2.4 billion USD insurance policy with Venture Global Calcasieu Pass, LLC.² SOMPO's provision of insurance to Venture Global materially supports Venture Global's operations in Louisiana by acting as a financial safety net against catastrophic losses and reducing associated risks.

On SOMPO's website on Business and Human Rights³, it is mentioned that "we have established a system to receive a wide range of complaints, consultations, and opinions regarding human rights from a diverse range of stakeholders and rights holders." We demand SOMPO to address this complaint in accordance with this system.

I. Infringements of Human Rights Policies and Laws

¹ Rainforest Action Network, *Risk Exposure: The Insurers Secretly Backing the Methane Gas Boom in the US Gulf South* (February 2024), <https://ran.org/risk-exposure>

² Rainforest Action Network, "Calcasieu Pass LNG 3.14.26 Insurance Certificate," 2025, accessed October 2025, <https://www.ran.org/wp-content/uploads/2025/05/Calcasieu-Pass-LNG-3.14.26-Insurance-Certificate.pdf>.

³ SOMPO Holdings Inc, "Overall Picture of Business and Human Rights Initiatives," SOMPO Holdings, accessed February 2026, <https://www.sompo-hd.com/en/csr/action/employee/content4/bhr/?device=pc>

SOMPO's Infringements of its Own Human Rights Policy

This complaint pertains to Venture Global, a corporation with a documented history of adverse impacts on local communities and a consistent pattern of non-compliance with applicable local, national, and international laws and regulations designed to protect public health and human rights. Venture Global's conduct and SOMPO's knowing complicity reflect a clear and ongoing disregard for legal and ethical obligations, have led to an emergent ecological and human rights crisis. Such actions are in direct violation of SOMPO's Policy for Human Rights and Policy for cross sectors, in principle and in practice.

SOMPO's continued business relationship with Venture Global exposes the company to significant legal and reputational risks and undermines SOMPO's stated commitment to human rights.

SOMPO is responsible for upholding the principles enshrined in its Human Rights Policies, and for complying with the relevant international laws, conventions, and frameworks upon which such policies are founded and referenced.

SOMPO's Relevant Policies

- **Group Policy for Human Rights**
 - Respecting human rights of stakeholders - The scope of SOMPO's Policy for Human Rights⁴ extends to its all stakeholders, including Venture Global, which are held to the same standards as set forth in the Policy. Specifically, SOMPO's policy states: *"we will avoid, prevent or mitigate indirect adverse impact on human rights of our stakeholders. Should there be any abuse of human rights, we will address it promptly and adequately."*
 - Promotion of human rights in global markets - SOMPO commits to contribute toward the creation of social values of local communities. It states: *"we will comply with the laws and regulations of the countries and regions where our business operations and value chains are based. At the same time, we will conduct our business by taking into consideration the local culture and customs, as well as the environment and society in accordance with the expectations of stakeholders, and take into account local human rights issues."*
 - Expectation for suppliers and business partners - SOMPO must urge Venture Global to take proactive steps to mitigate any potential harm and ensure that human rights are respected throughout the duration of its business relationship with Venture Global, as emphasized in the Policy: *"our requirement for suppliers,*

⁴ SOMPO Holdings Inc, "Sustainability Vision and Policy," SOMPO Holdings, accessed February 2026, <https://www.sompo-hd.com/en/csr/system/vision/#03>

business partners and other stakeholders is to respect human rights based upon the international norms of behavior. In the event that we identify any adverse impacts of human rights, we will encourage them to take appropriate measures through engagement such as dialogue and consultation.”

- Human rights due diligence - SOMPO’s policy implies that SOMPO was or should have been aware of Venture Global’s well-documented history of non-compliance with human rights and environmental laws prior to entering into its business relationship with Venture Global. SOMPO’s policy specifically states: *“we will continuously establish a system of human rights due diligence to identify and assess any actual or potential human rights risk in order to prevent or mitigate these adverse impacts on human rights Sompo Group may cause or contribute to.”*

SOMPO clearly refers international norms of behaviour to the following guidelines on human rights:

- UN Universal Declaration on Human Rights
- International Covenants on Human Rights (International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights)
- ILO International Labor Standards
- The United Nations Guiding Principles on Business and Human Rights, known as “Ruggie Framework”
- UN Sustainable Development Goals
- The United Nations Global Compact
- Women’s Empowerment Principles (WEPs)
- The OECD Guidelines for Multinational Enterprises
- ISO26000

- **Sustainability-related Policy for Underwriting, Investments and Loans**

SOMPO has a policy for cross sectors and specific sectors that it “will assess the adverse environmental and social impacts of projects that may have such impacts, confirm the status of its customers’ responses to such impacts, and carefully consider to cases when evaluation transactions.” The target projects are as follows:

- Projects with negative impact on UNESCO World Heritage Sites
- Projects with negative impact on Ramsar-listed wetlands
- Projects with negative impact on human rights, e.g. use of Child or Forced labor
- Projects that violate the human rights of indigenous peoples or local communities
- Projects related to inhumane weapons, including anti-personnel landmines, biological weapons, chemical weapons, and nuclear weapons

For Indigenous peoples, SOMPO refers to the following standards:

- United Nations Declaration on the Rights of Indigenous Peoples
- United Nations Free, Prior and Informed Consent (FPIC)

II. Human Rights Abuses Caused by Venture Global and SOMPO

Venture Global has a documented history of adverse impacts on local communities and a consistent pattern of non-compliance with applicable local, national, and international laws and regulations designed to protect public health and human rights. SOMPO has aided and abetted these human rights abuses through its ongoing disregard for its legal and ethical obligations enshrined in global human rights frameworks and SOMPO's Human Rights Policy.

A. Recent Case Study: Venture Global's CP2 Construction Disaster

Venture Global's ongoing operations and current construction of its CP2 LNG terminal have dire impacts on the right to health of local community members, the right to adequate standard of living and livelihoods, with discriminatory impacts on particularly marginalized rightsholders in the region. The most recent and alarming example is the CP2 dredging disaster⁵, which confirms the years of warnings from local residents and advocates to regulators and financiers that building CP2 is a disaster waiting to happen.⁶ In a letter dated September 1, 2025, from Rainforest Action Network sent to SOMPO via partners at Japan Center for a Sustainable Environment and Society (JACSES), our organization shared that on August 4, 2025 small scale commercial fisherman spotted alarming quantities of mud and silt 'spoils' from a dredging project managed by Venture Global, burying their fishing grounds in a thick sludge days before the shrimping season opened, harming their projected catch and therefore their livelihoods.⁷ A detailed timeline and recap of recent events that includes local news reports and first-hand documentary photo and video evidence is in the public record.⁸ The results of the Louisiana Department of Energy and Natural Resources (LDNR) investigative scientific study conducted that approximately 9,000-18,000 cubic yards of dredging sediment overflowed into fishing

⁵ Devin Cruice, "La. Wildlife and Fisheries Says Silt in Big Lake Is Affecting Oyster Population; Fishermen Say Venture Global Dredging Accident Is to Blame," *KPLC-TV*, September 3, 2025, <https://www.kplctv.com/2025/09/04/la-wildlife-fisheries-says-silt-big-lake-is-affecting-oyster-population-fishermen-say-venture-global-dredging-accident-is-blame/>

⁶ Phil McKenna, "Fishermen in Southwest Louisiana Say LNG Terminals Are to Blame for Shrimp Harvest Decline," *Inside Climate News*, September 7, 2025, <https://insideclimatenews.org/news/07092025/louisiana-lng-terminals-shrimp-fishing/>

⁷ Nicholas Cunningham, "Dredge Operation near Venture Global's CP2 Spills into Fish Habitat," *GasOutlook*, August, 26, 2025, <https://gasoutlook.com/analysis/dredge-operation-near-venture-globals-cp2-spills-into-fish-habitat>

⁸ Habitat Recovery Project, "CP2 Dredge Disaster Timeline," accessed October 2025, <https://habitatrecovery.org/cp2-timeline>

waters and public wetlands.⁹ This caused unplanned harm to at least 260 acres of marsh¹⁰ and has ruined the oyster season for many fishing families.¹¹ These recent and legacy human rights harms from dredging and operational failures¹² have significantly eroded the company's social license to operate.¹³

B. Loss of Livelihood and Standard of Living (*Article 25 of the Universal Declaration of Human Rights, Article 11 of the International Covenant on Economic, Social and Cultural Rights*)

Methane export terminals like Calcasieu Pass LNG and expansion projects like CP2 (LNG) harms commercial fishermen, shrimpers, crabbers, and oyster harvesters because of tanker traffic and pollution and the related dredging throughout traditional fishing grounds.¹⁴ These same fisherfolk face the cumulative impacts of climate change, gas explosions and leakage, disasters, and oil and petrochemical expansion in the region.¹⁵

This devastating loss of livelihood and decimation of the seafood industry in Southwest Louisiana is at odds with the UN Universal Declaration on Human Rights¹⁶ of which SOMPO has adopted as an underlying tenet of its Group Policy for Human Rights.¹⁷ Fisherfolk are at risk of losing their livelihoods, and with it, their access to fair affordable housing as declining income creates the conditions in which many can no longer afford insurance for their homes.¹⁸ This

⁹ Devin Cruice, "La. Wildlife and Fisheries Says Silt in Big Lake Is Affecting Oyster Population; Fishermen Say Venture Global Dredging Accident Is to Blame," *KPLC-TV*, September 3, 2025, <https://www.kplctv.com/2025/09/04/la-wildlife-fisheries-says-silt-big-lake-is-affecting-oyster-population-fishermen-say-venture-global-dredging-accident-is-blame/>

¹⁰ Sierra Club, "Coalition Files Opening Brief Challenging FERC's CP2 LNG Export Facility Approval in Louisiana," October 15, 2025, <https://www.sierraclub.org/press-releases/2025/10/coalition-files-opening-brief-challenging-ferc-s-cp2-lng-export-facility>

¹¹ Misha Mayeur, "Louisiana Oyster Season Facing Crisis: Fisherfamilies in Cameron, LA, Cite Major Die off from Dredging and Dumping from Shipping, Refinery and LNG Projects," *Habitat Recovery Project*, November 3, 2025, <https://habitatrecovery.org/press-releases/oyster-opener>

¹² Louisiana Bucket Brigade, "Gas Export Spotlight: Operational," accessed October 2025, https://labucketbrigade.org/wp-content/uploads/2023/01/Gas_Export_Spotlight_CameronCalcasieuPass.pdf

¹³ ScienceDirect, "Superhydrophobic Silicone/Graphene Oxide-Silver-Titania Nanocomposites as Eco-Friendly and Durable Maritime Antifouling Coatings," accessed October 2025, <https://www.sciencedirect.com/science/article/abs/pii/S0272884223031644>

¹⁴ Amelia S. Wenger et al., "A Critical Analysis of the Direct Effects of Dredging on Fish," *Fish and Fisheries* 18, no. 5 (2017): 967–985, <http://onlinelibrary.wiley.com/doi/10.1111/faf.12218/full>

¹⁵ Julie Schwartzwald Meaders, "Health Impacts of Petrochemical Expansion in Louisiana and Realistic Options for Affected Communities," *Tulane Environmental Law Journal* 34, no. 1 (2021): 113–47, <https://www.jstor.org/stable/27089955>

¹⁶ Office of the United Nations High Commissioner for Human Rights (OHCHR), "Illustrated Universal Declaration of Human Rights," December 15, 2025, <https://www.ohchr.org/en/universal-declaration-of-human-rights/illustrated-universal-declaration-human-rights>

¹⁷ SOMPO Holdings Inc, "Sustainability Vision and Policy," SOMPO Holdings, accessed February 2026, <https://www.sompo-hd.com/en/csr/system/vision/#03>

¹⁸ Marcus Baram, "On Louisiana's Gulf Coast, Residents Fume as Insurers Hike Rates and Invest in Fossil Fuel Projects," *Capital & Main*, October 8, 2025,

demonstrates how loss of livelihood negatively impacts the right to an adequate standard of living. Article 25 of the UDHR guarantees the right to an adequate standard of living and security resulting from “lack of livelihood in circumstances beyond [one’s] control”. This right is also provided for in article 11 of the International Covenant on Economic, Social and Cultural Rights.

C. The Right to Safe and Dignified Working Conditions (*Article 23 and 3 of the Universal Declaration of Human Rights, Article 6 and 25 of the International Covenant on Economic, Social and Cultural Rights, Principle 5 of the ILO Declaration on Fundamental Principles and Rights at Work, Performance Standard 2 of the International Finance Corporation’s (World Bank Group) Performance Standards on Environmental and Social Sustainability*)

The Universal Declaration on Human Rights Article 23 and the International Covenant on Economic, Social and Cultural Rights article 6 guarantees the “free choice of employment” with the UDHR further protecting “just and favorable conditions”¹⁹ However, Venture Global’s LNG operations are prohibiting the fishing communities free choice to engage in employment of their choosing by decreasing their catch by upwards of 50% according to 10 years of documented catch records²⁰, creating unsafe working conditions, and endangering the economic viability of the local seafood industry.²¹²² For example, Venture Global has shut down and/or destroyed public boat launches blocking crucial water access for local fishermen²³ and the massive waves from LNG export tankers cause damage to, and in some cases, sink shrimping and smaller fishing boats.²⁴ The physical limitations that Venture Global’s actions place on fisherfolk access to water and fishing catch is at odds with the ICECR article 25 which includes the right to “enjoy and utilize fully and freely their natural wealth and resources”. Many fisherfolk consider the large uptick in LNG tanker traffic to be a direct threat to the physical safety of themselves and their boats further depriving them of their UDHR Article 3 right to security of person and UDHR Article 23, ILO Declaration on Fundamental Principles and Rights at Work Principle 5, and the

<https://capitalandmain.com/on-louisianas-gulf-coast-residents-fume-as-insurers-hike-rates-and-invest-in-ossil-fuel-projects>

¹⁹ Office of the United Nations High Commissioner for Human Rights (OHCHR), “Illustrated Universal Declaration of Human Rights,” December 15, 2025,

<https://www.ohchr.org/en/universal-declaration-of-human-rights/illustrated-universal-declaration-human-rights>

²⁰ Federal Energy Regulatory Commission (FERC), *Local Fishermen, Landowners, and Organizations, Response to CP2 LNG and CP Express Form Letter Campaign*, Docket Nos. CP22-21 and CP22-22, United States of America Before the, accessed October 2025,

<https://drive.google.com/file/d/1fm42nLcRvY5omCXdaZBc48KW4GkwldMc/view>

²¹ Nicholas Cunningham, “Louisiana LNG Could Be ‘Nail in the Coffin’ for Local Fishermen.” *Gas Outlook*, February 29, 2024,

<https://gasoutlook.com/long-read/louisiana-lng-could-be-nail-in-the-coffin-for-local-fishermen/>

²² Louisiana Bucket Brigade, *Support Cameron Fisherman: A Collection of News Stories Published 2022-23*, <https://labucketbrigade.org/wp-content/uploads/2024/06/fishermenbooklet-sized.pdf>

²³ Louisiana Bucket Brigade, *Gas Export Spotlight: Venture Global’s Operational Failures and the Impacts on Fisherman*, December 2023,

<https://labucketbrigade.org/wp-content/uploads/2023/12/L-ABB-Monitoring-Report-r7.pdf>

²⁴ *Gulf Rising*, “In the Wake of LNG 003,” accessed October 2025,

<https://gulfrising.com/episodes/inthewakeofing>

International Finance Corporation's (World Bank Group) Performance Standards on Environmental and Social Sustainability Performance Standard 2, right to safe, and dignified working conditions.

Additionally, Venture Global's construction operations at Plaquemines LNG, also located on the Louisiana coast, revealed the company's lack of infrastructure and planning for worker and community safety during hurricane evacuations.²⁵

D. Right to Cultural Heritage (*Article 27 of the Universal Declaration of Human Rights, Article 15 of the International Covenant on Economic, Social and Cultural Rights*), *Performance Standards 7 and 8 of the International Finance Corporation's (World Bank Group) Performance Standards on Environmental and Social Sustainability, United Nations Declaration on the Rights of Indigenous Peoples*)

Many families have been stewards of these waters for generations, and their practices are central to their unique cultural heritage, a protected human right under UHRD Article 27²⁶, ICESCR Article 15, ICESCR Article 15, and the World Bank's Performance Standard 8.

Some fisherfolk hold various Indigenous identities and state-recognized tribal memberships²⁷ further protecting their rights as Indigenous people is guaranteed by the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)²⁸ and the World Bank's Performance Standard 7. SOMPO's Policy for Cross Sectors requires careful consideration of transactions involving projects that "*violate the human rights of indigenous peoples (referencing FPIC) or local communities*". However, this policy has not been adhered to, as dredging at CP2 caused sediment to flow into local fishing grounds and public wetlands, encroaching upon their traditional fishing areas and impacting their livelihoods.

E. Right to Health (*Article 12 of the International Covenant on Economic, Social and Cultural Rights, Article 26 of the International Covenant on Civil and Political Rights, Performance Standard 4 of the International Finance Corporation's (World Bank Group) Performance Standards on Environmental and Social Sustainability*)

Aside from the immediate physical danger, unsafe working conditions are complicated by the adverse health impacts from Venture Global's point source pollution which manifest as constant

²⁵ Louisiana Bucket Brigade, *GRIDLOCK: How Venture Global Endangers Plaquemines Parish*, August 26, 2024, <https://labucketbrigade.org/wp-content/uploads/2024/08/Gridlock-Report-R4-Print.pdf>

²⁶ Fishermen Involved in Sustaining our Heritage (FISH), *Quotes from Cameron Fishermen on Venture Global's LNG Export Facilities*, 2024, https://drive.google.com/file/d/1Kbfnr_hoYKUB-maphiNC3Ja1czum5bJe/view

²⁷ Rachel W. Smith, "Louisiana's Liquefied Natural Gas Terminal Poses Environmental and Safety Risks on the Gulf Coast," *Grist*, July 11, 2024, <https://grist.org/energy/louisiana-liquefied-natural-gas-terminal-lng-gulf-coast/>

²⁸ United Nations, *UN Declaration on the Rights of Indigenous Peoples*, United Nations, 2007, <https://www.ohchr.org/en/indigenous-peoples/un-declaration-rights-indigenous-peoples>

nosebleeds, asthma, and cancer.²⁹ This infringes upon the local community rightsholders enjoyment of Performance Standard 4 of the International Finance Corporation's (World Bank Group) Performance Standards on Environmental and Social Sustainability and Article 12 of the International Covenant on Economic, Social and Cultural Rights which protects the right to health and explicitly recognizes in 12(2)(b) the obligation to improve environmental health as means to protect human health.³⁰ These impacts are also highly racialized and disproportionately impact historically marginalized Black, Indigenous, and People of Color Communities as "sacrifice zones".³¹ According to the United Nations Special Rapporteur on Human Rights and the Environment, "a sacrifice zone can be understood to be a place where residents suffer devastating physical and mental health consequences and human rights violations as a result of living in pollution hotspots and heavily contaminated areas."³² Reports find residents living near where "LNG terminals are located, are slated to suffer the worst air pollution impacts per capita."³³ These disproportionate, discriminatory racialized impacts directly contravene Article 26 of the International Covenant on Civil and Political Rights and Article 2 of the International Covenant on Economic, Social and Cultural Rights which both protects the right to non-discrimination based on race.³⁴

F. Health Impacts From Legally Non-Compliant Air Pollution

These health impacts are exacerbated by the preponderance of illegal levels of air pollution that Venture Global emits. Calcasieu Pass LNG violated its air permit on 286 of the first 343 days it was in operation, meaning it was compliant only 17% of the days in 2022.³⁵ According to its own reports, this amounted to over 2,000 total permit violations in its first year of operation.³⁶ Newly

²⁹ Louisiana Bucket Brigade, *Gas Export Spotlight: Operational Problems at Cameron LNG and Calcasieu Pass*, 2022,

https://labucketbrigade.org/wp-content/uploads/2023/01/Gas_Export_Spotlight_CameronCalcasieuPass.pdf

³⁰ International Covenant on Economic, Social and Cultural Rights, art. 12(2)(b), Dec. 16, 1966, 993 U.N.T.S. 3.,

<https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

³¹ Bullard Center for Environmental & Climate Justice, "Liquefying the Gulf Coast," May 2024,

<https://www.bullardcenter.org/resources/liquefied-natural-gas-lng>

³² United Nations Human Rights Council, *Annex 1 to A/HRC/49/53: Report of the Special Rapporteur on the Rights of Indigenous Peoples* (Geneva: United Nations, March 2022),

https://www.ohchr.org/sites/default/files/2022-03/Annex1_to_A_HRC_49_53.pdf

³³ Greenpeace & Sierra Club, *Permit to Kill: Potential Health and Economic Impacts from U.S. LNG Export Terminal Permitted Emissions*, (published August 2024),

<https://www.greenpeace.org/static/planet4-usa-stateless/2024/12/86998834-permit-to-kill.pdf>

³⁴ International Covenant on Economic, Social and Cultural Rights, art. 2, Dec. 16, 1966, 993 U.N.T.S. 3.,

<https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

³⁵ Louisiana Bucket Brigade, *Analysis of Venture Global Semi-Annual Monitoring Reports* (2022),

<https://labucketbrigade.org/wp-content/uploads/2023/08/Analysis-of-VG-Semi-Annual-Semi-Annual-Monitoring-Reports-May-2023-1-compressed.pdf>

³⁶ Louisiana Bucket Brigade, *Gas Export Spotlight: Venture Global's Operational Failures and the Impacts on Fishermen*, December 2023,

<https://labucketbrigade.org/wp-content/uploads/2023/12/LABB-Monitoring-Report-r7.pdf>

published research finds that the terminal is out of legal compliance with the Clean Air Act for over 50% of the time since it began operations.³⁷ Official complaints filed with Louisiana Department of Environmental Quality (LDEQ) by nearby residents include photographic evidence and meticulous documentation that chronicle Venture Global's under reporting on the frequency of flaring, operational accidents, and excessive emissions amounts when it began operations in 2022.³⁸ This resulted in the LDEQ issuing an enforcement order in 2023³⁹ and updated it in May 2025 with additional documented emissions and flaring, including the company's failure to comply with its legal obligation to properly report emissions deviations.⁴⁰ The chemicals released by Calcasieu Pass LNG include methane and sulfur dioxide, potent pollutants that lead to asthma and other life threatening respiratory disorders.⁴¹ These Clean Air Act deviations are currently involved in a new Federal lawsuit⁴² along with other lawsuits to terminate the project's key state⁴³ and federal operational permits.⁴⁴

These legal challenges demonstrate that this facility is at odds with SOMPO's stated policy that: *"we will comply with the laws and regulations of the countries and regions where our business operations and value chains are based. At the same time, we will conduct our business by taking into consideration the local culture and customs, as well as the environment and society in accordance with the expectations of stakeholders, and take into account local human rights issues."* These well documented legal violations and their resulting negative impact on the environment are at odds with the right to a clean, healthy, and sustainable environment

³⁷ Environmental Integrity Project, *Terminal Trouble: Pollution Violations at America's LNG Export Terminals* (October 29, 2025),

<https://environmentalintegrity.org/wp-content/uploads/2025/10/LNG-Report-nonembargoed-10.29.25.pdf>

³⁸ Louisiana Bucket Brigade, *Speed Over Safety: Gas Export Spotlight: Venture Global Calcasieu Pass Facility Accidents, January 18 - May 31, 2022*,

<https://labucketbrigade.org/wp-content/uploads/2022/08/SpeedOverSafety.pdf>

³⁹ Louisiana Department of Environmental Quality, *Compliance Order & Notice of Potential Penalty*; AE-CN-22-00367; EDMS Document No. 13873284, June 29, 2023, accessed October 2025,

<https://edms.deq.louisiana.gov/app/doc/view?doc=13873284>

⁴⁰ Louisiana Department of Environmental Quality, *Amended Compliance Order & Notice of Potential Penalty*; AE-CN-22-00367A; EDMS Document No. 14762198, May 9, 2025, accessed October 2025,

<https://edms.deq.louisiana.gov/app/doc/view?doc=14762198>

⁴¹ Greenpeace & Sierra Club, *Permit to Kill: Potential Health and Economic Impacts from U.S. LNG Export Terminal Permitted Emissions*, (published August 2024)

, <https://www.greenpeace.org/static/planet4-usa-stateless/2024/12/86998834-permit-to-kill.pdf>

⁴² "Environmental Groups File Federal Lawsuit against Louisiana CP2 LNG Export Facility's Clean Air Act Permit" Environmental Integrity, September 19, 2025.

<https://environmentalintegrity.org/news/environmental-groups-file-federal-lawsuit-against-louisiana-cp2-lng-export-facilitys-clean-air-act-permit/>

⁴³ "Louisiana Community and Environmental Groups Challenge Coastal Use Permits for Controversial CP2 Project." Earthjustice, April 11, 2024,

<https://earthjustice.org/press/2024/louisiana-community-and-environmental-groups-challenge-coastal-use-permits-for-controversial-cp2-project>

⁴⁴ "Coalition Files Opening Brief Challenging FERC's CP2 LNG Export Facility Approval in Louisiana" Southern Environmental Law Center, October 15, 2025,

<https://www.selc.org/press-release/coalition-files-opening-brief-challenging-fercs-cp2-lng-export-facility-approval-in-louisiana/>

established by the UN Human Rights Council.⁴⁵ Additionally, these legal protections can be viewed as the fulfilment of the State's obligation in Article 2(1) of the International Covenant on Economic, Social and Cultural Rights to establish legislative enforcement mechanisms that actualize rights guaranteed under the Covenant. In summary, SOMPO's financial support for Venture Global's legally non-compliant actions violates its own policies, the jurisdictional authority in which it operates, and thereby undermines the legal enforcement mechanisms used to protect globally recognized human rights.

III. SOMPO's Culpability and Responsibility to Remedy Harm

A. Culpability: SOMPO Facilitated and Profited From These Human Rights Harms

The Calcasieu Pass LNG terminal cannot lawfully operate without insurance coverage. Adequate insurance is a fundamental requirement for Venture Global's continued operations and for its LNG export expansion plans, like the CP2 construction that's currently underway.

Louisiana law requires industrial facilities to maintain sufficient insurance coverage as a condition of lawful operation. In addition, federal law requires insurance as a prerequisite to obtaining and maintaining essential federal permits.

Absent adequate insurance coverage, expansion projects such as CP2, and the proposed CP3, are unlikely to reach a Final Investment Decision and be financially viable to build. SOMPO received \$371 million USD from direct fossil fuel premiums in 2023-2024.⁴⁶ While the company does not make this information public, it is reasonable to assume that SOMPO financially profited from its business relationship with Venture Global. This relationship provides legitimacy to other financial institutions and investors to follow suit— despite credible evidence of serious human rights and legal risks.

SOMPO's strict adherence to its own human rights policies could have helped restrict the overall market availability of insurance coverage for energy sectors that negatively impact human rights and the environment. For example, new academic research from the University of Zurich demonstrates that when insurers adhered to their underwriting restrictions it created market conditions that directly constrained coal operations.⁴⁷

⁴⁵ United Nations Environment Programme, "In Historic Move, UN Declares Healthy Environment a Human Right," accessed October 2025, <https://www.unep.org/news-and-stories/story/historic-move-un-declares-healthy-environment-human-right>

⁴⁶ Insure Our Future, *Renewables Gallop As Fossil Fuels Stall—Opportunities and Risks in the Energy Transition*, September 2025, pg 2, https://global.insure-our-future.com/wp-content/uploads/sites/2/2025/09/IOF_MonteCarloBriefing_090225_Digital.pdf

⁴⁷ University of Zurich, "Insurers' Carbon Underwriting Policies Can Constrain Fossil Operations," 2025, accessed October 2025, <https://www.df.uzh.ch/en/newsevents/news/2025/insurers-carbon-underwriting-policies.html>

Given this context, SOMPO's decision to insure Venture Global and its Calcasieu Pass terminal enables the company to operate. Accordingly, SOMPO is therefore responsible for contributing to adverse human rights impacts arising from its client's activities. The UN Guiding Principles on Human Rights Principle 13 states that business enterprises are required to "mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts."⁴⁸ SOMPO's conduct has played a critical role in legitimizing, enabling, and facilitating the associated risks and human rights harms. The company now must step up to remedy them.

B. Right to Remedy (Article 8 of the Universal Declaration of Human Rights, Article 2 of the International Covenant on Civil and Political Rights, Principle 22 of the UN Guiding Principles on Business and Human Rights)

As enshrined in Article 8 of the Universal Declaration of Human Rights, local residents and the impacted fishing community have a right to remedy from the harm that Venture Global's negligent operations have caused to their environment, health, cultural heritage, and livelihoods. The Right to Remedy can be compensatory, restorative, and/or preventative for future human rights violations.⁴⁹ See Section III (E) for a detailed course of action for SOMPO to enact these effective remedies for the harm it has caused. Additional relevant frameworks on the Right to Remedy are also detailed in Principle 22 of the UN Guiding Principles on Business and Human Rights and Article 2 of the International Covenant on Civil and Political Rights.⁵⁰

C. SOMPO's Responsibility and Consequences

SOMPO has a responsibility to implement its internal policies and to ensure that its business activities are consistent with its human rights obligations under international human rights law.

- **SOMPO's Board of Directors** - SOMPO's Board of Directors are personally responsible for overseeing the compliance with SOMPO's Group Policy for Human Rights. Failure to adequately ensure human rights compliance may be perceived as misleading shareholders as to the company's risk management approach and thus may result in shareholder accountability for breach of duties by SOMPO's Board of Directors including; Mikio Okumura, Masahiro Hamada, Shinichi Hara, Scott Trevor Davis, Isao Endo, Kazuhiro Higashi, Misuzu, Shibata, Takashi Nawa, Meyumi Yamada, Masayuki

⁴⁸ United Nations Office of the High Commissioner for Human Rights, *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework*, New York and Geneva: Human Rights Council, 2011,

https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

⁴⁹ Office of the High Commissioner for Human Rights, "Universal Declaration of Human Rights at 70: 30 Articles on 30 Articles — Article 8 | OHCHR," accessed October 2025,

<https://www.ohchr.org/en/press-releases/2018/11/universal-declaration-human-rights-70-30-articles-30-articles-article-8>

⁵⁰ Office of the United Nations High Commissioner for Human Rights (OHCHR), *International Covenant on Civil and Political Rights*, accessed February 2026,

<https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>

Waga, Toru Kajikawa, Yuji Kawauchi and Shinobu Imamura.

- **OECD and Complaints** - If further redress is necessary to remedy the human rights harms outlined in this grievance an additional complaint may be filed as a “specific instance” to the Organisation for Economic Co-operation and Development (OECD). The OECD’s Guidelines on Multinational Enterprises also incorporate respect for the UN Guiding Principles on Business and Human Rights, and related human rights standards. A precedent exists for grievances being filed against insurance brokers in relation to their facilitation of insurance for energy projects linked to human rights abuses.⁵¹ Additionally, Japanese multinational enterprises (MNE) that face allegations of non-adherence to the UNGPs may be subject to formal complaints to the OECD’s Japanese National Contact Point which includes the Government of Japan’s Ministry of Foreign Affairs, the Ministry of Health, Labour, and Welfare, and the Ministry of Economy, Trade and Industry.⁵²
- **Government of Japan** - The Government of Japan’s Ministry of Economy, Trade and Industry (METI) outlines the expectations for Japanese companies to comply with human right standards in its Guidelines on Respecting Human Rights in Responsible Supply Chains and the National Action Plan on Business and Human Rights.⁵³ Failure to adhere to METI’s human rights standards may contribute to significant legal and future regulatory risk exposure if companies’ human rights due diligence are found to be insufficient to address human rights abuses.⁵⁴ This in turn could create reputational damage and impact a company's market competitiveness.
- **Japan Contact and Engagement for Responsible Business Conduct (JaCER)** - The Japan Center for Engagement and Remedy on Business and Human Rights (JaCER) established in 2022 operates a “non-judicial engagement and remedy platform” for the redress of grievances brought against member companies in accordance with the UN Principles on Business and Human Rights. When JaCER receives a complaint filed against a member company it will engage the company to provide technical advice and constructive pressure to ensure they fulfill their responsibility to respect human rights. JaCER will also appoint and operate panels of independent experts that can carry out deeper investigations into the grievance and mediate a dialogue between the company and affected stakeholders to advance their access to remedy.

⁵¹ OECD Watch, “Inclusive Development International et al. vs. Marsh,” February 7, 2023, <https://www.oecdwatch.org/complaint/inclusive-development-international-et-al-vs-marsh/>

⁵² Ministry of Foreign Affairs of Japan, “OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,” accessed December 19, 2025, https://www.mofa.go.jp/ecm/oecd/page22e_000946.html

⁵³ METI (Ministry of Economy, Trade and Industry), “Business and Human Rights’: Towards a Responsible Value Chain,” accessed October 2025, https://www.meti.go.jp/english/policy/economy/biz_human_rights/index.html

⁵⁴ Chambers and Partners, “Business & Human Rights 2025,” *Business & Human Rights 2025 – Japan | Global Practice Guides*, last updated June 12, 2025, accessed October 2025, <https://practiceguides.chambers.com/practice-guides/business-human-rights-2025/japan/trends-and-developments>

- **UN Special Procedures** - Grievances linked to companies, including insurers, may also trigger special investigations by UN Special Procedures mandate holders, which has a precedent for awarding millions of dollars in damages to communities impacted by the catastrophic losses of insured projects.⁵⁵

D. Course of Action to Remedy Human Rights Harms

1. **Deny Coverage:** We urge SOMPO to deny coverage for Venture Global, before the policy with Calcasieu Pass LNG is set to renew March 14, 2026, as its operations are not aligned with SOMPO's principles, reputational, or financial interests. If Venture Global has failed to adequately disclose to SOMPO its real-world risks and liabilities this is grounds for immediate termination of any underwriting coverage.
2. **Rule Out Future Coverage:** Publicly rule out any future coverage for Venture Global's risky expansion projects, like CP2, CP3, and Plaquemines LNG Phase II.
3. **Human Rights Due Diligence:** Additionally, we urge SOMPO to conduct a full Human Rights Due Diligence (HRDD) process as outlined in its policies to assess the systemic harm to local communities, livelihoods, and public health. Company business practices should be fully aligned with the human rights due diligence framework, provide remediation from harm, and refrain from underwriting fossil fuel expansion.⁵⁶
 - **Internal Investigation & Accountability** - Undertake a thorough internal investigation to identify responsibility for the serious violations of company policy described herein. The investigation must examine the decision-making processes and approvals related to the issuance of the insurance policy for Venture Global, including whether such coverage was authorized in compliance with the company's human rights policy and due diligence processes. The investigation should identify and hold accountable individuals and result in the suspension of specific staff—such as the Co-Heads of International Business, Group CRO (Group Chief Risk Officer), Group CLCO (Group Chief Legal and Compliance Officer), and the Chief Underwriting Officer—and the withholding of remuneration from all individuals who oversaw or approved the issuance of non-compliant coverage.
 - **Meet with impacted community members** - As part of the company's HRDD this should include travel from senior company leadership, like Board of Directors and/or Executive Officers, for in-person meetings with impacted community members in Southwest Louisiana to hear their first-hand testimony of human rights harms and to more accurately assess the associated risks on site.

⁵⁵ Inclusive Development International, "Laos: Demanding Accountability for Deadly Dam Collapse," July 24, 2023, <https://www.inclusivedevelopment.net/cases/laos-xe-pian-xe-namnoy-dam-collapse/>

⁵⁶ Claire Bright and Karin Buhmann, "Risk-Based Due Diligence, Climate Change, Human Rights and the Just Transition," *Sustainability* 13, no. 18 (2021): 10454, <https://www.mdpi.com/2071-1050/13/18/10454>

- **Address this complaint in accordance with SOMPO’s system** - On the SOMPO website on Business and Human Rights, it is mentioned that “we have established a system to receive a wide range of complaints, consultations, and opinions regarding human rights from a diverse range of stakeholders and rights holders.” SOMPO should address this complaint in accordance with the system.
4. **Remedy Monetary Harms Suffered by Affected Communities:** It is incumbent upon SOMPO Group to engage with its client, Venture Global, and affected communities to bring about an immediate cessation of dredging and CP2 related construction activities. This must include remediation of the harm from the ongoing impacts of CP2 dredging operations as outlined in the letter from the impacted fishing community dated August 25, 2025 and sent to SOMPO on September 1, 2025. This may include a thorough investigation and impact assessment, community-monitoring and accountability, and remediation of the impacted fisheries and wetlands. As SOMPO materially benefitted from the repercussions of failing to undertake appropriate due diligence and/or act on a lack of compliance after the fact, it is the company’s responsibility to remedy the harm as specified in Section III (C). This could include direct financial compensation to impacted residents and/or a community managed fund.⁵⁷
 5. **Articulate the Grievance Mechanism that affected people can use:** There is no articulated Grievance Mechanism that people affected by underwriting projects can use to report their situations. SOMPO’s website claims that an external public facing whistle-blower hotline exists but does not publicly provide that number or clear process to access that mechanism.⁵⁸ We recognize that Tokio Marine has a Global Stakeholders Hotline⁵⁹, which is available for people affected by underwriting projects to file a complaint. SOMPO must adopt a comparable grievance mechanism in line with the company’s obligations to more meaningfully engage with stakeholders under Principle 15 of the OECD Guidelines for Multinational Enterprises and publicly report progress under Principle 21 of the UN Guiding Principles on Business and Human Rights.⁶⁰ The Japanese Government’s Guidelines on Respecting Human Rights in Responsible Supply Chains Section 5.1 specifies requirements for accessible, equitable grievance mechanisms.⁶¹

⁵⁷ Alyssa Portaro, “Dead Shrimp and Broken Promises: Venture Global’s Latest Environmental Disaster,” *Habitat Recovery Project Substack*, accessed October 2025,

<https://habitatrecoveryproject.substack.com/p/febc30c8-9ed1-4115-80f3-790eafbbb87>

⁵⁸ SOMPO Holdings, “Whistle-blowing and Consultation System,” Accessed February 2026,

<https://www.sompo-hd.com/en/company/compliance/approach/wbcs/>

⁵⁹ Tokio Marine, “Basic Approach to and Policy on Human Rights: Sustainability,” Accessed October 2025,

<https://www.tokiomarinehd.com/en/sustainability/humanrights.html>

⁶⁰ United Nations Office of the High Commissioner for Human Rights, *Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework*, accessed February 2026,

https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

⁶¹ Japanese Ministry of Economy, Trade and Industry (METI) and Ministry of Foreign Affairs, “Guidelines on Respecting Human Rights in Responsible Supply Chains,” The Inter-Ministerial Committee on Policy

We look forward to your timely response by March 11th, 2026.

Sincerely,

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