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Japan

30 April 2026

CALL FOR DIVESTMENT FROM THE EXPANSION OF LNG CANADA PHASE II AND THE COASTAL GASLINK (CGL) PIPELINE

Dear Mr. Katsuya Nakanishi,

I am writing on behalf of Amnesty International, an independent global human rights movement of more than ten million people. We campaign for companies to respect human rights wherever they operate in the world. We write to you today to share our concern regarding your financing of LNG Canada, and to urge you to cease funding for Phase II of the project.

Mitsubishi Corporation has made a commitment to work to respect the rights of Indigenous Peoples and local communities as they relate to Mitsubishi's business activities. Specifically, Mitsubishi's Human Rights Policy (6) (8) states:

We respect the rights of indigenous and local people as defined by the laws and international arrangements of the countries and regions in which we operate. We will take measures that our business operation will not cause or contribute to cause threat to the rights of indigenous and local people.¹

As outlined below, the construction and proposed expansion of the Coastal GasLink (CGL) pipeline and its compressor stations, integral to the LNG Canada infrastructure, violates Indigenous Peoples' rights enshrined in international law and incorporated into Canadian federal law as well as British Columbia's provincial law. Specifically, the construction and proposed expansion of CGL violates the rights of the Indigenous Wet'suwet'en Nation. While Mitsubishi's financing of LNG Canada is nominally directed at the terminal facility in Kitimat, British Columbia, outside of Wet'suwet'en territory, this financing creates a clear and ongoing direct linkage to the CGL pipeline and associated infrastructure, without which the terminal facility cannot operate, thereby facilitating and sustaining the pipeline's impacts on Wet'suwet'en territory.² We urge Mitsubishi to respect Canadian federal and provincial laws, international human rights laws and standards, as well as its own policies, and halt funding for Phase II of LNG Canada.

¹ Mitsubishi Corporation, Human Rights Policy (6) (8), <https://www.mitsubishicorp.com/jp/en/sustainability/social/humanrights/001.html>, Accessed March 18, 2026.

² Japan Bank for International Cooperation, LNG Canada Project (Environmental Review), https://www.jbic.go.jp/en/business-areas/environment/projects/image/62412_2.pdf, accessed 6 May 2025; TC Energy (September 11, 2025). Media statement: "TC Energy commends announcement of nation-building projects to connect and transform Canada's economy." <https://www.tcenergy.com/newsroom/statements/tc-energy-commends-announcement-of-nation-building-projects-to-connect-and-transform-canadas-economy/#:~:text=September%2011%2C%202025-.TC%20Energy%20commends%20announcement%20of%20nation%20building%20projects%20to%20connect.LNG%20Canada%20in%20their%20FID.>

Amnesty International therefore urges Mitsubishi Corporation to:

- Urgently halt further financing of LNG Canada in order to prevent human rights violations in the construction of its facilities and associated pipelines, compressor stations and other related infrastructure, including the CGL pipeline which is integral to LNG Canada's operation.
- Use its leverage to address and mitigate the harms inflicted upon the Wet'suwet'en people under LNG Canada and associated infrastructure, and in doing so, engage directly with Wet'suwet'en Hereditary Chiefs, and their clans, to identify appropriate measures for accountability and reparations.
- Use its leverage to urge CGL to immediately halt the construction of the proposed compressor stations (conditioned on the expansion of LNG Canada's export facility in Kitimat) and use of the Coastal GasLink pipeline within the unceded territories of the Wet'suwet'en Nation.
- Develop a comprehensive policy to restrict financing of new and expanded LNG infrastructure as part of Mitsubishi's ESG and climate policy frameworks.

Further details of Amnesty's findings and conclusions are provided in the Annex. This draws on research published by Amnesty in 2025 that documented the organization's concerns over the human rights impact of the CGL Pipeline.³ As part of our research, we shared our findings with companies involved in the project. CGL replied to Amnesty International in October 2025 both "as the developer and operator" of the CGL pipeline and on behalf of its partners KKR, AIMCo and TC Energy. Its reply was incorporated within our report.⁴

In addition to the calls above, we invite you to review and comment on the attached findings and conclusions. If you have comments, please send them by May 15, 2026. Please note that we may publish this letter and also reflect any information we receive from you in our published materials as appropriate (which may include quoting your responses verbatim).

If you should require any further information on this critical issue, we would be happy to meet with your representatives to discuss further.

Yours sincerely,



Mark Dummett

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³ Amnesty International, *Extraction Extinction: Why the Lifecycle of Fossil Fuels Threatens Life, Nature, and Human Rights*. (Index: POL 30/0438/2025) November, 2025. <https://www.amnestyusa.org/reports/extraction-extinction-why-the-lifecycle-of-fossil-fuels-threatens-life-nature-and-human-rights/>

⁴ *Id.*

ANNEX

HUMAN RIGHTS VIOLATIONS ASSOCIATED WITH THE CGL PIPELINE

The CGL pipeline runs directly through the unceded, ancestral territory of the Wet'suwet'en Nation. Construction of the CGL pipeline has proceeded without free, prior and informed consent (FPIC) from the Wet'suwet'en Hereditary Chiefs, on behalf of their clans, required both by Canadian constitutional law and international human rights laws and standards. Simply sharing information or consulting with Indigenous Peoples is not sufficient to secure consent. Wet'suwet'en Hereditary Chiefs, on behalf of their clans, have consistently opposed the construction of the CGL pipeline on their land.⁵

The forced continuation of the project has resulted in intrusive and aggressive surveillance, harassment and intimidation, and arrests under heavily militarized police raids. The Wet'suwet'en have been unable to perform many of their traditional activities, such as hunting, fishing and berry picking, as well as cultural ceremonies, because the land has been damaged by construction and operations of the pipeline. This is in violation of Indigenous Peoples' human rights including the right to freedom of peaceful assembly, the right to self-determination, right to privacy, right to a clean, healthy and sustainable environment, and the right to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions. Furthermore, the proposed expansion of the CGL pipeline under CGL Phase II, including the construction of six additional compressor stations, two of which are in Wet'suwet'en territory, will not only affect the territory of host clans, but the whole Nation's ancestral land use and management system, specifically the ability to access and use other clans' territories for cultural and subsistence activities. This threatens to further disconnect Wet'suwet'en members from their ancestral territory and limit their free movement within their lands.

The proposed compressors will also bring a large industry presence and the construction of "man camps" (worker accommodation), and likely a heavy police and private security presence as well. As experienced during the pipeline construction, members of the Nation anticipate hostile behaviour from construction workers, security personnel and Royal Canadian Mounted Police (RCMP) officers establishing checkpoints, conducting surveillance, following members of the Nation, and potentially restricting access to the land. Amnesty International found that members of the Wet'suwet'en Nation's right to health, especially mental health, and integrity of the person have been seriously undermined and would be violated by the construction of new fossil fuel infrastructure on their territory. Wet'suwet'en land defenders interviewed by Amnesty International have experienced and continue to experience both physical and psychological impacts as a result of the first phase of construction of the CGL pipeline, including stress, anxiety, weight loss and depression. The situation has caused and continues to cause many feelings of powerlessness, anger, sadness, disappointment, fear and worry.⁶

The United Nations Committee on the Elimination of Racial Discrimination (CERD) issued an early warning and urgent action decision in December 2019 urging Canada to halt construction of the pipeline and withdraw police forces from Wet'suwet'en lands until free, prior, and informed consent had been secured.⁷ In follow-up communications sent to Canada in November 2020 and April 2022, CERD reiterated that Canada had not taken measures to implement its 2019 decision and called on the State to engage in negotiations and consultations with the Wet'suwet'en peoples affected by the CGL pipeline, as well as to prevent and duly investigate the allegations of surveillance measures, practises of arbitrary detention and instances of excessive use of force against Wet'suwet'en land defenders by the RCMP and private security firms.⁸ Furthermore, two hereditary Chiefs of the Wet'suwet'en Nation have filed a complaint with the Japan

⁵ Amnesty International, "Removed from our land for defending it": Criminalization, Intimidation and Harassment of Wet'suwet'en Land Defenders. (Index: AMR 20/7132/2023). December 11, 2023. <https://www.amnesty.org/en/documents/amr20/7132/2023/en/>

⁶ Amnesty International, *Extraction Extinction: Why the Lifecycle of Fossil Fuels Threatens Life, Nature, and Human Rights*. (Index: POL 30/0438/2025) November, 2025. <https://www.amnestyusa.org/reports/extraction-extinction-why-the-lifecycle-of-fossil-fuels-threatens-life-nature-and-human-rights/>

⁷ UN Committee on the Elimination of Racial Discrimination (CERD). Decision 1(100), Dec. 2019, tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT/CERD/EWU/CAN/9026&Lang=en

⁸ CERD, Communication to Canada, 29 April 2022, CERD/EWUAP/106thsession/2022/MJ/CS/ks, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2fCERD%2fALE%2fCAN%2f9554&Lang=en; CERD, Communication to Canada, 24 November 2020, CERD/EWUAP/102ndsession/2020/MJ/CS/ks, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT/CERD/ALE/CAN/9296&Lang=en.

Bank of International Cooperation for its investment in the project through Mitsubishi, and these complainants are still awaiting a final report and response to their human rights concerns.⁹

ECOLOGICAL AND CLIMATE HARM CAUSED BY THE CGL PIPELINE

The extensive ecological destruction caused by the construction of the Coastal GasLink pipeline is grave. The project has repeatedly failed to meet provincial environmental standards, and the British Columbia Environmental Assessment Office (EAO) has issued 59 warnings, 30 orders – including 13 stop-work orders – and, with these latest penalties, approximately \$1.3 million CAD in fines against the CGL pipeline for failures in erosion and sediment control, which has damaged local ecosystems.¹⁰

The proposed expansion of the CGL pipeline under CGL Phase II, including the construction of six additional compressor stations, two of which are in Wet'suwet'en territory, represents further significant degradation and erosion of Wet'suwet'en territory. Amnesty International found that continuous air pollution, noise, vibration and bright lighting from compressor stations risks driving moose, bears and fur-bearing animals away from established hunting and trapping areas, disrupting the seasonal hunts and trapping lines that contribute to Wet'suwet'en food security, culture and land-based teaching. At the proposed Titanium Peak compressor station –which would be built 15.6km from the Unist'ot'en Healing Centre–, all the vents together would release 864.88 m³ of gas per day. For the Parrott Lakes compressor station –which would be built 3.4km from Likhts'amisyu village–, the daily total would be 490m³.¹¹ Compressors also emit methane non-routinely through leaks and incomplete combustion (methane slip). New roads, dust from resumed construction work and heavy traffic around the sites could further endanger important local flora including berry patches and medicinal plants.¹²

Moreover, the continued expansion of fossil fuel extraction projects, such as fossil gas, does not only threaten Wet'suwet'en local ecosystems, but also harms people and critical ecosystems across the globe.¹³ The LNG Canada project relies on fracked gas, fossil-powered infrastructure, and emits large amounts of carbon dioxide as well as methane which has over 80 times the global warming potential of carbon dioxide over a 20-year timeframe. Climate change has real victims, all around the world. Environmental degradation, climate change and unsustainable development constitute some of the most pressing and serious threats to the ability of present and future generations to enjoy the right to life.¹⁴

Indigenous Peoples suffer disproportionate impacts of the climate crisis.¹⁵ Wet'suwet'en Hereditary Chiefs have already reported the following climate impacts:

"Intensifying wildfire seasons have already forced evacuations, choked communities with toxic smoke, and destroyed wildlife habitat. Warmer winters, earlier snowmelt, and erratic water levels are disrupting traditional fishing cycles, threatening Indigenous food security. These direct effects impair the Wet'suwet'en's constitutionally protected rights to practice land-based stewardship, access traditional resources, and maintain intergenerational cultural knowledge."¹⁶

Along with those around the globe affected by the very urgent harms of climate change, the Wet'suwet'en are at the frontline of both the harms caused by the construction of fossil gas infrastructure and the climate harms caused by transport and use of the fossil gas extracted by the project. Extractive fossil fuel projects like the Coastal GasLink pipeline

⁹ Friends of the Earth Japan. July 17, 2025. "Indigenous Leaders in Canada Demand Accountability from JBIC and Mitsubishi for Complicity in LNG Canada Violations." <https://foejapan.org/en/issue/20250717/24985/> (Accessed March 23, 2026).

¹⁰ British Columbia Government News. September 12, 2024. "Coastal GasLink project fined \$590,000 for non-compliance." <https://news.gov.bc.ca/releases/2024ENV0043-001511> (Accessed March 23, 2026).

¹¹ The Unist'ot'en Healing Centre is a culturally-grounded initiative aimed at fostering wellness, resilience and decolonization, reconnecting Indigenous People with their land, culture and ancestral teachings. Likhts'amisyu village was once an ancestral village site and has become a land reclamation project for the Wet'suwet'en Nation. Amnesty International, *Extraction Extinction: Why the Lifecycle of Fossil Fuels Threatens Life, Nature, and Human Rights*. (Index: POL 30/0438/2025) November, 2025. <https://www.amnesty.org/en/documents/pol30/0438/2025/en/>

¹² Amnesty International, *Extraction Extinction: Why the Lifecycle of Fossil Fuels Threatens Life, Nature, and Human Rights*. (Index: POL 30/0438/2025) November, 2025. <https://www.amnestyusa.org/reports/extraction-extinction-why-the-lifecycle-of-fossil-fuels-threatens-life-nature-and-human-rights/>

¹³ Amnesty International, *Extraction Extinction: Why the Lifecycle of Fossil Fuels Threatens Life, Nature, and Human Rights*. (previously cited).

¹⁴ UN Human Rights Office of the High Commissioner, Human Rights Committee, General comment No. 36, para. 62 (CCPR/C/GC/36)

¹⁵ See for example, <https://www.un.org/development/desa/indigenouspeoples/climate-change.html>

¹⁶ Chief Na'Moks, a Hereditary Chief of the Tsayu (Beaver Clan) & Gwii Lok'im Gibuu (Jesse Stoeppler), Co-Executive Director for Skeena Watershed Conservation Coalition and Deputy Chief of Hagwilget Village Council (2025). "Objection Regarding the LNG Canada Project and Associated Coastal GasLink Pipeline in British Columbia, Canada"

cannot continue to cause multi-layered and intergenerational damage and violations of the rights of the people who are least responsible for the climate crisis.¹⁷

THE RIGHTS OF INDIGENOUS PEOPLES

The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), adopted in 2007, sets out the obligations of countries to respect the survival, wellbeing, dignity and rights of Indigenous Peoples. It recognizes historical and ongoing exploitation and infringements on their rights and outlines steps necessary to protect their rights:

“...indigenous peoples have suffered from historic injustices as a result of, inter alia, their colonization and dispossession of their lands, territories and resources, thus preventing them from exercising, in particular, their right to development in accordance with their own needs and interests.” (UNDRIP Preamble)¹⁸

The Coastal GasLink project infringes upon these internationally recognized rights of the Wet’suwet’en people, including but not limited to their right to self-determination, collective right to live in freedom, peace and security as distinct peoples, right to practice and revitalize their cultural traditions and customs, right to a healthy environment, right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.¹⁹

International law practitioners have consistently recognized that free, prior, and informed consent (FPIC)¹⁹ of Indigenous Peoples must be obtained²⁰ when implementing projects on their land, or when implementing projects that may affect them.²¹ Land use and resource extraction without FPIC, which the CGL pipeline project did not obtain, is in direct violation of this core international human rights standard.

As informed by UNDRIP and other international human rights instruments, Section 35 of Canada’s Constitution affirms that Indigenous Peoples in Canada have a unique connection to and constitutionally protected interests in their lands, including decision-making, governance, jurisdiction, legal traditions, and fiscal relations associated with those lands.²² Canada recognizes that the inherent right of self-government is an existing aboriginal right under the Constitution which includes the rights of Indigenous Peoples to govern themselves in matters that are internal to their communities or integral to their unique cultures, identities, traditions, languages and institutions, and regarding their unique relationship with their land and their resources.²³

The Supreme Court of Canada has affirmed the Wet’suwet’en Nation’s hereditary governance structure.²⁴ On 24 May 2020, the Wet’suwet’en Hereditary Chiefs signed a memorandum of understanding with the governments of Canada and British Columbia, recognizing Wet’suwet’en aboriginal rights and title throughout the Yin’tah (territory) and that these rights and title are held by Wet’suwet’en Houses under their system of governance.²⁵

UNDRIP is further incorporated into Canadian federal law through the UN Declaration on the Rights of Indigenous Peoples Act (2021)²⁶ and in British Columbia under its own Declaration on the Rights of Indigenous Peoples Act (2019)²⁷. The federal and local laws mandate the government to realize UNDRIP in the Canadian context and to achieve the objectives of UNDRIP in consultation and co-operation with Indigenous Peoples.

¹⁷ Amnesty International, *Fatal fuels: Why human rights protection urgently requires a full and equitable fossil fuel phase out*. (Index: POL 30/7382/2023) November 2023. <https://www.amnesty.org/en/documents/pol30/7382/2023/en/>; Amnesty International, *Extraction Extinction: Why the Lifecycle of Fossil Fuels Threatens Life, Nature, and Human Rights*. (previously cited).

¹⁸ United Nations Declaration on the Rights of Indigenous Peoples, Preamble

¹⁹ Canada also recognizes that “meaningful engagement with Indigenous Peoples aims to secure their free, prior and informed consent when Canada proposes to take actions which impact them and their rights, including their lands, territories and resources.” Since Haida Nation v. British Columbia (2004), federal and provincial governments have been subject to a formal duty to consult Indigenous Peoples and accommodate their interests whenever their asserted or established aboriginal or treaty rights may be affected by government conduct.

²⁰ International Law Association, *The Hague Conference, Rights of Indigenous Peoples, Interim Report* (2010). Accessed April 1, 2026 at: https://www.ila-hq.org/en_GB/documents/conference-report-the-hague-2010-13

²¹ See also Japan Ministry of Justice’s guidance, on page 47 of: <https://www.moj.go.jp/content/001417137.pdf>

²² Canada, Constitution Act, 1867, s. 35; Department of Justice Canada, Principles Respecting the Government of Canada’s Relationship with Indigenous Peoples, 2018, [justice.gc.ca/eng/csj-sjc/principles.pdf](https://www.justice.gc.ca/eng/csj-sjc/principles.pdf), p. 3

²³ Report of the Special Rapporteur on the rights of Indigenous Peoples, James Anaya, The situation of Indigenous Peoples in Canada, para. 9

²⁴ Supreme Court of Canada. *Delgamuukw v. British Columbia*, [1997] 3 S.C.R. 1010, <https://decisions.scc-csc.ca/scc-csc/scc-csc/en/item/1569/index.do>.

²⁵ Government of Canada, Memorandum of Understanding Between Canada, British Columbia and Wet’suwet’en as agreed on February 29, 2020, 14 May 2020, [rcaanc-cirnac.gc.ca/eng/1589478905863/1589478945624](https://www.rcaanc-cirnac.gc.ca/eng/1589478905863/1589478945624).

²⁶ United Nations Declaration on the Rights of Indigenous Peoples Act, SC 2021, c 14. See also: <https://www.justice.gc.ca/eng/declaration/index.html>

²⁷ Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c 44. See also: <https://www2.gov.bc.ca/gov/content/governments/indigenous-people/new-relationship/united-nations-declaration-on-the-rights-of-indigenous-peoples>

In line with Mitsubishi Corporation's human rights policy, the company is expected to respect the rights of Indigenous Peoples to self-determination as recognized under the UN Declaration and Canadian law.²⁸

THE HUMAN RIGHTS RESPONSIBILITIES OF COMPANIES

There is a clear global consensus that all companies have a responsibility to respect human rights throughout their global operations as reflected in the UN Guiding Principles on Business and Human Rights (UN Guiding Principles).²⁹ This responsibility requires companies to conduct human rights due diligence throughout their entire value chain to identify, prevent, and mitigate any actual or potential involvement in human rights abuses. The UN Guiding Principles specifically mention that human rights due diligence guidance to businesses should effectively consider specific challenges faced by vulnerable groups, including Indigenous Peoples.³⁰ Companies should recognize the unique challenges faced by Indigenous Peoples, and take steps to ensure that their rights are protected, including through human rights due diligence with respect to business activity impacting indigenous peoples.³¹ Companies may directly or indirectly cause, contribute to or benefit from a human rights abuse and therefore must carry out robust human rights due diligence across business activities to prevent, mitigate and remedy any such abuses.³² Drawing upon the UN Guiding Principles, the OECD Guidelines for Multinational Enterprises (OECD Guidelines) provide practical guidance for multinational corporations on how to implement their responsibility to respect human rights, including on how they should carry out human rights due diligence.³³ The 2023 updated version of the OECD Guidelines note that companies should avoid causing or contributing to harms to Indigenous Peoples' rights and carry out due diligence in a way that takes into account the distinct and intersecting risks faced by marginalized groups, including Indigenous Peoples.³⁴ Japan's National Action Plan on the UN Guiding Principles³⁵, updated December of 2025, spells out expectations for companies to respect human rights in their business activities. Specifically, it states: "the Government expects all Japanese enterprises to respect internationally recognized human rights and make every effort to take initiatives in line with human rights principles" and that, if an enterprise causes or exacerbates negative impacts on human rights, the government calls on the enterprise it "to take preventive and mitigating measures and provide remediation."

In June 2023, the UN Working Group on Business and Human Rights adopted an information note clarifying what actions states and businesses should take to embed human rights considerations into climate change policies, processes and actions.³⁶ The Guidance stresses that in line with international human rights, environmental and climate law, states should take action on climate change-related harms to human rights and the environment on the basis of justice and equity, in accordance with their CBDR-RC.³⁷ It makes clear that companies' responsibility to respect human rights includes "the responsibility to act in regard to actual and potential impacts related to climate change".³⁸ The Guidance urges companies to "[p]hase out both the use of fossil fuels and the production of greenhouse gas emissions, avoid

²⁸The Canadian government's disregard of international human rights standards, as well as its own laws, does not relieve corporations of a responsibility to respect human rights. The Canadian governments actions regarding the Wet'suwet'en have come under international condemnation and scrutiny. See e.g. UN Human Rights Committee, Concluding observations on the seventh periodic report of Canada, para 54. March 23, 2026 (CCPR/C/CAN/CO/7).

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR%2FC%2FCAN%2FCO%2F7&Lang=en In its second letter to the Canadian government in 2020, the UN Committee for the Elimination of Racial Discrimination (CERD) was so concerned about violations of the rights of the Wet'suwet'en and Secwepemc Peoples, that it encouraged Canada to seek technical advice from the Expert Mechanism on the rights of Indigenous Peoples to help it implement its obligations. CERD, Communication to Canada, 24 November 2020, CERD/EWUAP/102ndsession/2020/MJ/CS/ks,

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT/CERD/ALE/CAN/9296&Lang=en

²⁹ UN Guiding Principles on Business and Human Rights, www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights

³⁰ *Id.*

³¹ See e.g. United Nations Development Programme (2025). Training Facilitation Guide: Heightened Human Rights Due Diligence. New York, United States of America. <https://www.undp.org/sites/g/files/zskgke326/files/2025-11/undp-bhr-heightened-human-rights-due-diligence.pdf>

³² Amnesty International, *Outsourcing Responsibility: the human rights policies of the defence sector*, (Index: ACT 30/0893/2019), Chapter 5, www.amnesty.org/en/wp-content/uploads/2021/05/ACT3008932019ENGLISH.pdf

³³ OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023.

³⁴ OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023, Arts. 45, 64 & 72.

³⁵ Japan Revised National Action Plans for Business and Human Rights (2025). <https://globalnaps.org/wp-content/uploads/2026/01/Japan-Revised-NAP-2026-open.pdf>

³⁶ UN Working Group on the issue of human rights and transnational corporations and other business enterprises, "Information Note on Climate Change and the Guiding Principles on Business and Human Rights" (Information Note), June 2023, <https://www.ohchr.org/sites/default/files/documents/issues/business/workinggroupbusiness/Information-Note-Climate-Change-and-UNGPs.pdf> para. 3.

³⁷ Information Note (previously cited), para. 15.

³⁸ Information Note (previously cited), para. 16.

contributing to deforestation, and not use carbon offsets”, as well as ensuring that “their value chains and practices are in line with the goal of achieving a just transition to a zero-carbon economy.”³⁹

Furthermore, Japan’s Ministry of Environment has reiterated in its Environmental Due Diligence Guide for corporations⁴⁰ that negative environmental impacts are connected to negative human rights impacts, and introduces the UN General Assembly decision in July 2022 which declared that access to a clean, healthy and sustainable environment are a universal human right. It also spells out the reasons for this decision -- that the effects of climate change, unsustainable use and management of natural resources, contamination of the air, earth, and water, inappropriate management of chemicals and waste, and the resulting loss of biodiversity and ecological services hinder people from accessing a clean, healthy and sustainable environment, and that the destruction of the environment both directly and indirectly affect all human rights negatively. The government has also referred to connections between the environment and human rights in the newly revised National Action Plan.⁴¹

THE HUMAN RIGHTS RESPONSIBILITIES OF INVESTORS

The responsibility to respect human rights and to prevent harm also applies to investors, including both asset managers and asset owners.⁴² The UN Office of the High Commissioner of Human Rights has determined that ‘Impacts arising from the activities of the entities in which an investor has a minority shareholding can ... reasonably be considered as being directly linked to the investors’ operations, products or services.’⁴³ By managing the investment of funds in companies involved in activities associated with the Coastal GasLink pipeline project, investors can become directly linked to a system that deprives Wet’suwet’en people of their fundamental rights. Where an investor is directly linked to human rights abuses, they have a responsibility to use their leverage with their investee company to seek to cease its contribution to those abuses and mitigate any harm.

³⁹ Information Note (previously cited), paras 19(b) and (d).

⁴⁰ Japan Ministry of Environment, An Introduction to Environmental Due Diligence in Value Chains (2023) <https://www.env.go.jp/content/000131067.pdf>

⁴¹ Japan Revised National Action Plans for Business and Human Rights (2025) (previously cited)

⁴² Scope and applications of ‘business relationships’ in the financial sector under the OECD Guidelines for Multinational Enterprises, mneguidelines.oecd.org/global-forum/GFRBC-2014-financial-sector-document-2.pdf. According to the OECD, “It is interpretive guidance regarding the applicability of the UNGPs by minority shareholders, the OHCHR therefore concludes that (minority) shareholdings of institutional investors constitute a business relationship.” See also UNGPs 10+ and UN B-Tech dialogue on investment and human rights, OHCHR B-Tech, 2020, www.ohchr.org/Documents/Issues/Business/UNGPsBHRnext10/ConceptNote_UNGP10_BTech.pdf, which clarifies that “[T]he term institutional investor’s refers to institutions invested in public equities, fixed income, and private equities, including venture capital funds.”

⁴³ OHCHR, Letter to the Centre for Research on Multinational Corporations, “The issue of the applicability of the Guiding Principles on Business and Human Rights to minority shareholdings”, Geneva, 26 April 2013, <https://www.ohchr.org/sites/default/files/Documents/Issues/Business/LetterSOMO.pdf>