Managing Director Christine Lagarde  
International Monetary Fund  
700 19th Street NW  
Washington, DC 20431  

Re: Possible Breach of Cameroon Loan Terms  

Dear Managing Director Lagarde:  

We are writing on behalf of Access Now,1 Internet Sans Frontières,2 and the University of Southern California School of Law International Human Rights Clinic3 to call to your attention to the terms of a recent International Monetary Fund (“IMF”) loan to the Government of Cameroon. The loan, which was approved in June 2017, “aims to restore the country’s fiscal and external sustainability and unlock job-rich, private sector-driven growth.”4 Under its terms, Cameroon agreed to a recurring obligation to report, within two weeks, “[a]ny decision, decree, law, order or circular having economic or financial implications, from its publication date or effective date.”5  

In at least two instances in 2017, one from January to April6 (prior to the conclusion of the loan) and one beginning in October (after the conclusion of the loan), the Government of Cameroon shut or slowed down internet services in certain regions of the country. The regions

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1 Access Now is an NGO that defends and extends the digital rights of users at risk around the world.  
2 Internet Sans Frontières is an NGO that fights for digital rights and against digital repression and oppression.  
3 The University of Southern California School of Law International Human Rights Clinic handles pro bono, real-life cases and advocacy projects that confront some of the most pressing human rights concerns.  
5 Technical Memorandum of Understanding, p. 36.  
targeted are primarily inhabited by the Anglophone minority group in Northwest and Southwest Cameroon.\textsuperscript{7} Internet access in the affected Anglophone regions has continued to be intermittently unavailable and problematically slowed or ineffective through 2018.\textsuperscript{8} We have not been able to locate information indicating that Cameroon reported these violations to the IMF and/or sought approval for these internet shutdowns. These disruptions were key events in the escalation of the conflict. By depriving populations of internet access for many months, the government has created a de facto lawless zone in part of the country. This area is slowly descending into a civil war today.\textsuperscript{9}

The result is that the Government’s unlawful interference with internet freedom has had a debilitating effect on the economy, affecting not only media companies but also businesses, as they are dependent upon internet for transactions and operations. A conservative estimate of the economic harm done places it at $3.2 million,\textsuperscript{10} while others estimate that the costs may have been as high as $38.8 million.\textsuperscript{11} Further, Cameroon’s 2018 Moody’s Investor Services ratings were also adversely affected by the civil unrest in the Anglophone communities. These ratings are particularly important because they are used by sovereign wealth funds, pensions, and other investors to assess the creditworthiness of a country.\textsuperscript{12}

Cameroon’s actions have not targeted the internet alone. Setting aside credible reports of torture, targeted killings, and the forceful suppression of peaceful protest by the Anglophone population,\textsuperscript{13} Cameroon has also imposed curfews and closed certain land and maritime

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\textsuperscript{7} Amnesty International, \textit{Cameroon: Widespread Human Rights Violations}, p. 8 ("During the protests in the Anglophone regions, phone and internet services were cut in those regions between January and April 2017").


\textsuperscript{9} BBC World News “Burning Cameroon: Images you're not meant to see” available at https://www.bbc.com/news/world-africa-44561929


borders. Such actions have also substantially crippled the regional economy. As a result, the Government was required to report actions that occurred after June 2017 to the IMF.

We understand that the IMF’s next review of Cameroon’s compliance with the terms of the loan is expected to be completed by 30 June 2018. We therefore respectfully request that the IMF ensure that Cameroon has complied with the terms of its loan by fully and accurately reporting “[a]ny decision, decree, law, order or circular having economic or financial implications, from its publication date or effective date.” We also ask that the IMF consider whether Cameroon’s conduct, including any failure to report, warrants further consequences with respect to the loan.

Sincerely,

Julie Owono
Executive Director
Internet Sans Frontières

Peter Micek
General Counsel
Access Now

16 Technical Memorandum of Understanding, p. 36.
Christina Hioureas
Chair, United Nations Practice Group
Counsel, International Litigation & Arbitration Department
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On behalf of Access Now

Hannah Gary
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