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4 East 27th Street
New York, NY 10001

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

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.

⁴ International Monetary Fund, Press Release No. 17/248, “IMF Executive Board Approves US\$666.2 Million Arrangement Under the Extended Credit Facility for Cameroon” (26 June 2017), *available at* <http://www.imf.org/en/News/Articles/2017/06/26/pr17248-imf-executive-board-approves-arrangement-under-the-extended-credit-facility-for-cameroon>.

⁵ Technical Memorandum of Understanding, p. 36.

⁶ Yomi Kazeem, “The internet shutdown in English-speaking parts of Cameroon is finally over”, *Quartz* (20 April 2017), *available at* <https://qz.com/964927/caemroons-internet-shutdown-is-over-after-93-days/>.

targeted are primarily inhabited by the Anglophone minority group in Northwest and Southwest Cameroon.⁷ Internet access in the affected Anglophone regions has continued to be intermittently unavailable and problematically slowed or ineffective through 2018.⁸ 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.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,¹⁰ while others estimate that the costs may have been as high as \$38.8 million.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.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,¹³ Cameroon has also imposed curfews and closed certain land and maritime

⁷ Amnesty International, *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").

⁸ Abdi Latif Dahir, "Cameroon has restricted internet access for more than 150 days in 2017", *Quartz* (27 November 2017), available at <https://qz.com/1138529/camerouns-anglophone-ambazonia-region-has-had-internet-restriction-for-150-days-in-2017>.

⁹ BBC World News "Burning Cameroon: Images you're not meant to see" available at <https://www.bbc.com/news/world-africa-44561929>

¹⁰ Universal Periodic Review, Joint Submission of Members of the Southern Cameroons Diaspora in the United States and the Southern Cameroons Public Affairs Committee (April to May 2018), p. 8.

¹¹ Collaboration on International ICT Policy in East and Southern Africa, *The Economic Impact of Internet Disruptions in Sub-Saharan Africa* (September 2017), p. 2, available at https://cipesa.org/?wpfb_dl=249.

¹² See Trading Economics, "Cameroon – Credit Rating," available at <https://tradingeconomics.com/cameroon/rating>.

¹³ See "U.S. accuses Cameroon of 'targeted killings' of Anglophones" *Reuters* (June 2018), available at <https://www.reuters.com/article/us-cameroon-usa/us-accuses-cameroon-of-targeted-killings-of-anglophones-idUSKCN1IJ23Y>.

borders.¹⁴ 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 2018.¹⁵ 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."¹⁶ 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

¹⁴ See, e.g., Ruth Maclean, "Deaths and detentions as Cameroon cracks down on anglophone activists", *The Guardian* (3 January 2018), available at <https://www.theguardian.com/world/2018/jan/03/deaths-and-detentions-as-cameroon-cracks-down-on-anglophone-activists> ("The government closed borders to the [A]nglophone regions before deploying the army's Rapid Intervention Brigade..."); Anna Ho, "Tale of Two States: Cameroon's Crisis", *Berkeley Political Review* (31 December 2017), available at <https://bpr.berkeley.edu/2017/12/31/tale-of-two-states-camerouns-crisis/> ("the government, in the days that followed the Oct 1st protests, deployed a thousand soldiers to the regions, put up roadblocks in the major streets, shut down its terrestrial and maritime borders, imposed a curfew from 9 pm to 7am, and once again blocked citizens from accessing the Internet.").

¹⁵ Memorandum of Economic and Financial Policies, p. 21.

¹⁶ Technical Memorandum of Understanding, p. 36.



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On behalf of Access Now



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