ENVIRONMENTAL MANAGEMENT POLICY FOR THE NIGER DELTA
Recommendations for the Way Forward
Nigeria is facing a national environmental emergency. After more than fifty years of negligence in the oil industry, the accumulation of oil spills and pollutants from flaring of gas have made the Niger Delta one of the most toxic environments in the world.

Combined with discharged industrial, domestic and human waste, the pollution is having a severe negative impact on biological communities, water quality, human health, and traditional livelihoods across the region.

Communities are neither compensated for the damage nor given the benefits of the plunder, so are themselves forced to overexploit the environment to survive. A growing segment of the population is left unable to pursue traditional livelihoods – such as fishing and agriculture - or seek alternative employment options. This is breeding resentment and increasing the risk of conflict in the region.

Furthermore, the mangrove forests are a key buffer against storm surges, erosion, and sea-level rise. They will become increasingly important in protecting the nation as it faces the realities of global warming. Protecting this ecosystem is therefore not only key to the prosperity and stability of the region, but Nigeria writ large.

Aside from providing these ‘ecosystem services’ of sustenance and resilience, the region’s environment holds tremendous cultural significance for indigenous groups and an unquantifiable inherent value.

In the 2015 Manifesto upon which the party was elected to national office, the All Progressives Congress (APC) pledged to secure “the continuous well-being of the inhabitants of the Niger Delta area, and take measures to address the long overlooked challenges of environmental devastation and mass poverty among the people whose land lays the golden egg.”

Despite all of these facts, the region has historically not been valued by the Federal Government as much as the resources within it. This paper contains recommendations in the key areas that must be addressed to begin to live up to this promise.

## List of Abbreviations

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<th>Abbreviation</th>
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<tr>
<td>APC</td>
<td>All Progressives Congress</td>
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<td>CSO</td>
<td>Civil Society Organisations</td>
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<td>DPR</td>
<td>Department of Petroleum Resources</td>
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<td>ECN</td>
<td>Energy Commission of Nigeria</td>
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<td>ECOWAS</td>
<td>Economic Community of West African States</td>
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<td>EGASPIN</td>
<td>Environmental Guidelines and Standards for the Petroleum Industry in Nigeria</td>
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<td>ESA</td>
<td>Environmental Stewardship Agency</td>
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<td>FAO</td>
<td>Food and Agriculture Organisation</td>
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<td>FME</td>
<td>Federal Ministry of Environment</td>
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<td>FMJ</td>
<td>Ministry of Justice</td>
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<td>FMNDA</td>
<td>Ministry of Niger Delta Affairs</td>
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<td>FMPR</td>
<td>Ministry of Petroleum Resources</td>
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<td>GDP</td>
<td>Gross Domestic Product</td>
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<td>GSF</td>
<td>Global Sanitation Fund</td>
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<td>HYPREP</td>
<td>Hydrocarbon Pollution Restoration Programme</td>
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<td>IOC</td>
<td>International Oil Company(ies)</td>
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<td>JIV</td>
<td>Joint Investigation Visit</td>
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<td>NASPA-CNN</td>
<td>The National Adaptation Strategy and Plan of Action on Climate Change for Nigeria</td>
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<td>NCC</td>
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<td>NDAP</td>
<td>The Niger Delta Action Plan</td>
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<td>Niger Delta Development Commission</td>
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<td>NDRDMP</td>
<td>The Niger Delta Regional Development Master Plan</td>
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<td>NERC</td>
<td>National Electricity Regulation Commission</td>
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<td>NFAP</td>
<td>Nigerian Forestry Action Programme</td>
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<td>NFP</td>
<td>National Forestry Programme</td>
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<td>NGO</td>
<td>Non-Governmental Organisation</td>
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<td>NOA</td>
<td>National Orientation Agency</td>
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<td>NOC</td>
<td>National Oil Company</td>
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<td>NOPMA</td>
<td>National Oil Pollution Management Agency</td>
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<td>NOSDRA</td>
<td>National Oil Spill Detection and Response Agency</td>
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<td>NNPC</td>
<td>Nigerian National Petroleum Company</td>
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<td>NPRC</td>
<td>National Political Reform Conference</td>
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<td>NTFP</td>
<td>Non-timber forest products</td>
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<td>NTDP</td>
<td>National Tree Nursery Development Programme</td>
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<td>ODF</td>
<td>Open-Defecation Free</td>
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<td>OPS</td>
<td>Organised Private Sector</td>
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<td>PIB</td>
<td>Petroleum Industry Bill</td>
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<td>RTCND</td>
<td>The Report of the Technical Committee on the Niger Delta</td>
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<td>SCF</td>
<td>Standard Cubic Feet</td>
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<td>SPDC</td>
<td>Shell Petroleum Development Company</td>
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<td>UN</td>
<td>United Nations</td>
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<td>UNDP</td>
<td>United Nations Development Commission</td>
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<td>UNEP</td>
<td>United Nations Environment Programme</td>
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<td>UN REDD+</td>
<td>United Nations Reducing Emissions from Deforestation and forest Degradation-plus Programme</td>
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<td>USD</td>
<td>United States Dollar</td>
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<td>WHO</td>
<td>World Health Organisation</td>
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<td>WSSCC</td>
<td>Water Supply and Sanitation Collaborative Council</td>
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<td>ZSL</td>
<td>Zoological Society of London</td>
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ENVIRONMENTAL MANAGEMENT POLICY FOR THE NIGER DELTA

INTEGRAL PARTS OF ENVIRONMENTAL POLICY FOR THE NIGER DELTA

POLICY RESPONSE ONE:
Natural Resource Management

- Declare a National Environmental Emergency
- Implement a Niger Delta REDD+ Partnership
- Creating a Framework for Protection of the Environment
- Environmental Management and Stewardship

POLICY RESPONSE TWO:
Oil Sector Environmental Management and Regulation

- Passing Key Environmental Legislation
- End Gas Flaring
- Addressing Oil Spills
- Establish a Taskforce to Oversee Implementation
- Implement Emergency Measures Immediately

POLICY RESPONSE THREE:
Implementation for the United Nations Environment Programme Report Recommendations

- Develop a Plan for Clean-Up and Restoration Across the Region
- Public Education in Waste Management
- Waste Management Action
- Sanitation and Clean Water Provision

POLICY RESPONSE FOUR:
Waste Management and Sanitation

Recommendations for the Way Forward
By Nextier Advisory and Stakeholder Democracy Network
POLICY RESPONSE 1: Natural Resource Management

According to the Food and Agriculture Organisation (FAO) of the United Nations, Nigeria has the highest rate of deforestation in the world. The Federal Ministry of Environment has said that if concrete abatement measures are not put in place, the remaining mangroves of the Niger Delta will likely disappear by 2020. Five years to save the trees. Deforestation of mangroves and hardwood forests is exacerbating poverty and climate change vulnerability in the region.

Emergency policies need to be put in place to tackle the direct causes, which include construction of oil infrastructure; clearing for small-scale agriculture; illegal commercial wood extraction (primarily for construction); non-commercial wood extraction (primarily fuelwood); and, pollution from gas flaring and oil spills. To be successful, these policies must address underlying drivers, such as commercial interest; inadequate law enforcement, policy and legislative frameworks; few alternative livelihood options; limited household income; and, lack of alternative energy sources.

1.1 Declare a National Environmental Emergency

1.1.1 Declare a national environmental emergency which has two parts – climate change and the impact of oil spills – both combining to create a serious threat to national security. Give special tasking to Ministries and agencies such as NOSDRA to respond to these areas and specific resourcing to achieve key objectives.

1.1.2 Ask State Governments to report within 3 months on specific programs they will be undertaking to assist in addressing the two aspects of this emergency.

1.1.3 Give the National Orientation Agency and Ministry of Information specific tasking on educating both the public and government bodies on the severity of the environmental pressure, along with the steps being taken by government and what the public can do to mitigate or reduce further damage.

1.1.4 Take responsibility for reporting back after 1 year on the emergency program for the environment and how this is situated within an ongoing plan for sustained response.

1.1.5 Demonstrate strong environmental leadership by placing the issue at the centre of implementing a development accord with the people of the Niger Delta.

1.2 Creating a Framework for protection of the Environment

1.2.1 Create national parks covering the remaining forested areas and mangroves, strengthen the legislation protecting their rights to existence, and monitor their wellbeing.

1.2.2 Map and geo-tag remaining hard wood forests in the Niger Delta to mitigate logging. This should form part of a national environmental database and a state-level reward system for protection and replanting.

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2 Illegal Logging Portal, Nigeria has worst deforestation rate, FAO revises figures, Last modified 17 November, 2005, Available online: http://www.illegal-logging.info/content/nigeria-has-worst-deforestation-rate-fao-revises-figures
1.2.3 Create a replanting and sustainable forestry plan.

1.2.4 Recognise the mangrove forests of the region as Nigeria’s only major sea defence against pending sea level rises, and grant national security status.

1.2.5 Establish State-level mangrove nurseries and community replanting training programmes.

1.2.6 Pass the draft National Forestry Act legislation to allow implementation of the National Forest Policy (2006).

1.3 Implement a Niger Delta REDD+ Partnership

1.3.1 Commission a detailed mapping for accurate baseline information of forest coverage and current land-use to accurately establish the potential number of carbon credits that can be generated.

1.3.2 Train communities to participate in on-the-ground measurement, reporting and verification (MRV) activities, and complement with remote sensing and other carbon stock monitoring.

1.3.3 Fund a comprehensive business planning exercise to determine the working capital that will be required to launch a state-wide pilot project, and the implementation process, with a view to become a Delta-wide initiative.

1.3.4 Establish a Community Fund to receive a portion of carbon finance.

1.3.5 Use revenues from carbon credits and initial private sector investment to finance clean-up operations within polluted sites prior to rehabilitation.

1.3.6 Introduce a national carbon trading system in Nigeria so that carbon credits generated through this initiative can also be sold within the country.

“Five years to save the trees”

1.4 Environmental Management and Stewardship

1.4.1 Support State-level commissions for environment to create systems for tracking land use change via monitoring systems that use satellite imagery to track destruction of forests and mangroves over time.

1.4.2 Carry out hotspot mapping in areas that have seen rapid destruction, or the indicators.

1.4.3 Train and deploy forest guards and community forest groups to implement forestry policy and legislation in forest reserves and other high-value forests outside of mangroves, and support conservation and restoration.

1.4.4 Instruct all oil block operators to carry out annual Environmental Impact Assessments and biodiversity audits of their respective blocks to track environmental performance.

1.4.5 Support the widespread dissemination of information that increases awareness on the importance of the environment not only as a resource for today, but tomorrow’s generation.

1.4.6 Create an environmental awareness curriculum for primary and secondary schools.

1.4.7 Develop alternative livelihood options for the rural economy through improving access to markets and finance, and investment in commercial potential of non-timber forest products (NTFPs). Promote alternative agricultural practices that decrease deforestation, improve yields and household income, and increase climate-resilience of small-scale farms.

1.4.8 Develop community-based suppliers for - and promote the use of - improved cookstoves for households to decrease demand for fuel wood, provide alternative income-generating activities, generate carbon credits, and improve social wellbeing through improved health.
POLICY RESPONSE 2: Oil Sector Environmental Management and Regulation

Nigeria emits more carbon dioxide into the atmosphere through gas flaring than the rest of the African continent together, an estimated 16 million tonnes yearly \(^4\). It is therefore a significant cause of global warming. Locally, the noxious products emitted contribute to the acidification of rain and waterways, damaging the vegetation, habitats and buildings; the fumes are associated with a variety of respiratory diseases, skin diseases and cancer \(^5\).

During the 2015 elections the APC Manifesto stated that “gas flaring in the course of mineral [and] oil mining activities shall be discontinued”, and also promised to “enforce the government master plan for oil companies to end flaring that pollutes the air and damages people’s health and ensure that they sell at least half of their gas production within Nigeria”.

The environmental damage is extensive. There have been more than 2,000 spills reported since January 2014 \(^6\). Meanwhile, the amount of gas being wasted through gas flaring is enough to add 27,000 Mega Watts (MW) to national power generation capacity \(^7\).

Addressing oil spills will require immediate strategic steps to reverse and remediate the impact of environmental degradation, alongside implementation of pre-emptive measures to minimise potential further pollution. Applying these measures will significantly improve the standards of living of host communities, and contribute to combating deforestation and the loss of biodiversity.

Separating environmental regulation from the responsibility of revenue generation is not only considered international best practice in the oil and gas industry, but key for the effective regulation of operations to mitigate environmental damage and non-compliance.

2.1 End gas flaring

2.1.1 Publicly recommit to the Manifesto pledge to end gas flaring in 10 years, and become the first ever administration to hold its promise to do so by implementing a number of alternate use programmes.

2.1.2 Declare support and officially endorse the World Bank Zero Routine Flaring by 2030 Initiative to send the message that eliminating routine flaring of gas is a significant and necessary step.

2.1.3 Increase the national power supply capacity by 27,000 MW by committing to a ‘Power not Pollution’ policy and investing in the development of local gas demand through a range of commercially viable gas power projects and associated infrastructure.

2.1.4 Expand the mandate of the independent national oil spill agency (NOSDRA/NOPMA) to include regulating gas flaring, with the legal power to monitor and penalise activities of polluters.

2.1.5 Establish a National Gas Commission to act as independent regulator for efficient and effective oversight of the country’s natural gas industry, as outlined in the Natural Gas Strategy.

2.1.6 Map all gas flares in the region and their proximity to population centres over the next 6-months to allow for effective gas-to-power project planning and installation of other infrastructure needed to evacuate 100 per cent of gas.

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\(^6\) NOSDRA, Nigerian Oil Spill Monitor. Available Online: oilspillmonitor.ng

\(^7\) Federal Ministry of Environment, Gas Flare Tracker. Available Online: gasflaretracker.ng/
2.1.7 Install measurement devices in all flare stacks that will accurately measure gas flaring quantity and composition in real-time and allow accurate calculation of fines.

2.1.8 Enforce obligation in oil exploration contracts to sell a minimum allocation of associated gas rising to 100 percent after five years operation.

2.1.9 Ensure that gas flaring fines are non-deductible from taxation, and systematically enforce penalties on an ongoing basis. Immediately publish fines issued, and payment status.

2.1.10 Ensure that regardless of the passage of the Petroleum Industry Bill (PIB), the provision is passed into law specifying a licence or lease for the production of oil and gas shall not be granted to any applicant unless applications are accompanied by a comprehensive programme for the utilization of natural gas acceptable to the regulatory agency.

2.1.11 Publically disclose all previously granted ministerial certificates that permit oil companies to continue flaring in undefined circumstances where it is deemed ‘unsuitable’ to do otherwise, and cease from granting new certificates in all cases.

2.2 Addressing Oil Spills

2.2.1 Ensure that an independent agency (either NOSDRA/NOPMA) with adequate funding, capacity and power to levy and collect fines and penalties oversees the management of oil spills.

2.2.2 Immediately implement the emergency recommendations of the United Nations Environmental Program’s Environmental Assessment of Ogoniland report.

2.2.3 Extend the scope of clean-up to systematically address all unremediated hydrocarbon contaminated areas in the Niger Delta to international standards.

2.2.4 Develop a detailed framework for a revised, inclusive Joint Investigation Visit (JIV) process and the use of redesigned JIV forms recording essential data on oil spills.

2.2.5 Develop a fair and transparent compensation and reparations framework to be overseen and facilitated by an independent agency responsible for the management of oil spills (NOSDRA/NOPMA).

2.2.6 Conduct a comprehensive study regarding the integrity of pipelines and other oil installations in order to establish a baseline dataset that can support a robust initiative requiring improved maintenance of these assets.

2.2.7 Improve pipeline surveillance through alternative community-based, inclusive approaches in order to tackle pipeline vandalism to minimise the possibility of oil pollution from illegal bunkering and oil theft.

2.2.8 Map all decommissioned and abandoned oil and gas assets and carry out a comprehensive impact assessment of their ongoing impact on the environment, social dynamics and livelihoods.

2.3 Passing Key Environmental Legislation

2.3.1 As a priority, ensure that ambiguous sections of the proposed NOSDRA Amendment Bill are revised:

- Clarify the structure, funding base and administration of the Oil Spillage and Liability Trust Fund
- Clarify the structure over penalties attracted when the spill is reported, as soon as it has been discovered, rather than when it first occurred.

“Power not Pollution”
2.3.2 Pass the NOSDRA Amendment Bill to ensure separation of oil and gas sector environmental regulation and revenue generation. The Ministry of Environment should be transferred all responsibility for environmental regulation, with the Ministry of Petroleum Resources retaining responsibility for revenue generation.

2.3.3 Ensure that the National Oil Pollution Management Agency (NOPMA) created by the NOSDRA Amendment Bill, and replacing NOSDRA, has adequate funding and sufficient capacity to carry out its regulatory duties.

2.3.4 Ensure that NOPMA has the power to set, revise, impose and collect fines for oil and gas pollution and non-compliance with environmental regulation.

2.3.5 Endorse the passage of the White Paper proposed by NOSDRA in 2014 to provide a clear mechanism for swift and fair compensation to communities impacted by oil extraction in cases of operator’s liability for pollution.

2.3.6 Ensure that the NOSDRA Amendment Bill is specifically referenced in a revised Petroleum Industry Bill to serve as a signpost towards relevant policies, regulation, processes and jurisdiction.

2.3.7 Ensure that sections contained in the PIB on environmental regulation remain priority and compliment the NOSDRA Amendment Bill, should a revision process of the PIB take place.

2.3.8 Support the establishment of the Oil Spill Liability Trust Fund under the NOSDRA Amendment Bill.

The proposed Ogoni clean-up has been repeatedly flagged as a key starting point for a wider program of clean-ups across the region. This is situated within widespread dissatisfaction with the quality of clean-up interventions by oil companies to date, and a truly massive acreage of land and mangrove territory that has seen no clean-up activity at all.

There is a need for an agency to develop a credible plan with emphasis on the lessons that can be learnt as the Ogoni clean-up is rolled out. Trust is a critical issue on much delayed clean-ups within the region. It is therefore imperative that the planning outlined below comes with early action, and that adequate funds are set aside for what will be a very large exercise at a time when resources are already constrained.

3.1 Implement Emergency Measures Immediately

3.1.1 Immediate implementation of Emergency Measures as outlined in the UNEP assessment:

1. Ensure that all drinking water wells where hydrocarbons were detected are marked and that people are informed of the danger

2. Provide adequate sources of drinking water to those households whose drinking water supply is impacted

3. People in Nsisioken Ogale who have been consuming water with benzene over 900 times the WHO guideline are recorded on a medical registry and their health status assessed and followed up

4. Initiate a survey of all drinking water wells around those wells where hydrocarbons were observed and arrange measures (1-3) as appropriate based on the results

5. Post signs around all the sites identified as having contamination exceeding intervention values warning the community not to walk through or engage in any other activities at these sites

6. Post signs in areas where hydrocarbons were observed on surface water warning people not to fish, swim or bathe in these areas

7. Inform all families whose rainwater samples tested positive for hydrocarbons and advise them not to consume the water, and

8. Mount a public awareness campaign to warn the individuals who are undertaking artisanal refining that such activities are damaging to their health

3.1.2 Facilitate meetings between the Ogoni restoration committee, Shell petroleum development company, UNEP and other relevant stakeholders. Demonstrate political will to keep the process on track by supporting implementation wherever possible and punishing non-delivery.

3.2 Establish a Taskforce to Oversee Implementation

3.2.1 Establish a ‘taskforce’ approach with a technically competent secretariat to co-ordinate the implementation of clean up, health protection, and restoration activities that reports to the stakeholder group and the Federal Government.
3.2.2 Design the taskforce so that it can be drawn into a Federal Agency - NOSDRA/NOPMA – once reached a maturity to be able to accommodate such working groups.

3.2.3 Within the taskforce establish an ‘economic multipliers’ team focused on maximizing the local gains from clean-up and related activities focused on both short- and medium-term gains.

3.3 Develop a Plan For Clean-Up and Restoration Across the Region

3.3.1 Establish a unit within the Ogoni taskforce focused on how to scale the intervention across the Niger Delta region.

3.3.2 Task NOSDRA/NOPMA and the Ministry of Environment to form in-house teams to advance broad plans and first critical interventions outside Ogoni, with a view to these being fully implemented.

3.3.3 As with the Ogoni clean-up, clearly identify plans for realistic economic multipliers to contribute to addressing key social and economic needs.

3.3.4 Ask NNPC and oil companies to begin setting aside reserves for a regional clean up, with the funds held in an appropriate trust mechanism at the Central Bank of Nigeria, or with a suitable international body.
POLICY RESPONSE 4:
Waste Management and Sanitation

In the Niger Delta, billions of Naira have repeatedly been allocated to water projects (and lesser sums to sanitation) that should have addressed many of the problems faced. However, poor contracting, an almost complete lack of local ownership, and outright corruption have caused shocking failure rates. Over 75 percent of NDDC water projects were measured to have failed when a brief survey was done in 2013. There needs to be a systematic mapping and overhaul of government led interventions on water and sanitation that places a central emphasis on public accountability and transparency as revised interventions are rolled out.

4.1. Public Education in Waste Management

4.1.1 Integrate waste management into basic and senior school curriculum to build ecologically conscious citizens and environmental stewards.

4.1.2 Run ‘Wealth in Wastes’ campaigns with local NGO networks.

4.1.3 Promote change in public behaviour through inculcating a ‘culture of bagging’. Communicate information through various media, talking to communities, and commission a series of docudramas to spread awareness.

4.1.4 To encourage proper trash disposal, offer citizens affordable, accessible alternatives. Distribute bins to citizens and provide public bins for regular waste collection.

4.1.5 Create a fund to support initiatives and entrepreneurship in ‘Wealth in Wastes’ competitions.

“Over 75% of NDDC water projects were measured to have failed”

4.2 Action on Waste Management

4.2.1 Implement a Youth Clean-Up Programme to clear rotting trash from urban public places, and plant trees and flowers in their place. Have teams working shifts for around the clock street sweeping and City beautification.

4.2.2 Commission construction of a Niger Delta Material Recovery Facility to separate waste set for landfill and prepare recyclable materials – such as paper, plastic and metal - for end-user manufacturers throughout the region. Seek Public-Private Partnerships to fund and run the facilities.

4.2.3 Emulate Lagos model and build Transfer Loading Stations on the outskirts of urban areas for trucks to deposit daily garbage intake to be sorted and transferred to distant dumpsites overnight when traffic is light.

4.2.4 Initiate public infrastructure works for surface water drainage in urban areas to reduce flooding and stagnant pools forming where mosquitoes and other disease carrying vectors breed.

4.2.5 Introduce laws and standards for manufacturers to invest in environmentally conscious packaging of consumer products, out of recycled products where possible.

4.2.6 Redress contracts for waste collection so operators have long-term agreements and encourage operators to finance equipment acquisition with loans and welcome competition for new operators to raise service standards.

4.2.7 Reshape state-level waste collection and disposal and create a public enlightenment agency – an ‘Environment Stewardship Agency’ (ESA) - to function autonomously, with oversight from the Ministry of Environment.
4.3 Sanitation and Clean Water Provision

4.3.1 Establish a National Regulatory Commission, with State-level presence, by restructuring and merging sanitation and water agencies, which at the moment function distinctly.

4.3.2 Increase Federal budget allocation on sanitation from less than 0.1 percent of GDP

4.3.3 Support the completion of the preparation of State Water Policies

4.3.4 Prioritise elimination of open defecation. It has higher cost impacts than any other sanitation practice, with considerable long-term adverse social impacts. Low cost and effective ways of stopping it need to be scaled up.

4.3.5 Extend the commitment to Open-Defecation Free (ODF) states from Cross Rivers to encapsulate the rest of the states in the Niger Delta, and execute the recommendations.

4.3.6 Intensify public enlightenment campaigns for toilets and hygiene promotion, targeting the poorest.

4.3.7 Decentralise ownership, operations and management of water supply systems to attract investment from the private sector.
Collaborating Agencies

Federal and State Ministries and Departments: Federal Ministry of Niger Delta Affairs; Federal Ministry of Petroleum Resources; Federal and State Ministries of Environment; Federal and State Ministries of Water Resources; Federal Ministry of Health; Ministry of Budget and National Planning; Department of Forestry; Federal Ministry of Justice and Attorney General


Organised Private Sector: Domestic and International Oil Companies; NNPC, International Biodiversity Experts; International Financial Institutions; Water Providers; Private Contractors


Domestic Third-Sector: Civil Society Organisations; Communities

The Ministry of Environment should be given a more specific mandate to lead on coordinating the implementation of all interventions for safeguarding the environment in the Niger Delta. It must work closely with the Ministry of Niger Delta Affairs on implementing a development accord that prioritises addressing environmental issues to sustain inclusive peace and economic growth for the region. The state commissions for environment will need to be trained and resourced to gather the information and manage implementation effectively.

The Ministry can be supported through technical assistance partnerships by the United Kingdom’s Department for International Development (DFID) and the World Bank to create the various mapping and tracking tools outlined, while seeking technical expertise from organisations that have mapped similar global biodiversity hotspots for conservation purposes, such as the Zoological Society of London.

To tackle gas flaring, seek support on regulation, conducting research, and disseminating best practices from the World Bank Group Global Gas Flaring Reduction Partnership (GGFR). Nigeria is already a partner on the program, receiving a partial risk guarantee on funding a gas plant, but has sought little support in these areas. The first step is committing to the Zero Routine Flaring by 2013 Initiative. This will allow access to further World Bank collaboration on enforcing company behavioural change.

To reinforce this, the Federal Government will need to facilitate the engagement with oil companies to redraw current terms of engagement and claw back power from the sector. The Ministry of Petroleum Resources will need technical assistance to transfer its responsibilities for flaring regulation to a new department of the national oil spill agency (NOSDRA/NOPMA). It must have the resources to operate independently, yet be able to rely on cooperation across key government agencies.

Technical level support from UNEP will be required to effectively execute the plans in line with international best practice. Collaboration can also create an opportunity for financing. Local indigenous civil society groups can create an important intermediary role as they have been representing the Ogoni people on the issue for the past twenty years.
Planning must engage with local communities through participative consultations to ensure that local-level priorities are fully included in intervention activities. To achieve this, create contracts with local civil society organisations well equipped to implement development projects, sensitisation activities, training locals in alternative livelihoods and environmental stewardship, and to provide independent on-going monitoring and evaluation of delivery and impact.
Sources of Funding

Federal and State Ministries and Departments: Federal Ministry of Petroleum Resources; Federal Ministry of Environment; Federal Ministry of Niger Delta Affairs; Federal Ministry of Defence

National Agencies and Departments: Niger Delta Development Commission; National Oil Spill Detection and Response Agency

International: International Donor Organisations; International development partners.

Organised Private Sector: International carbon credit market; Public-Private Partnerships

Classifying the environment as a security threat to the nation will enable funds to be released from federal and state security budgets. An allocation of 10 percent of existing state and local government security budgets spent on creating a framework for environmental stability would give the undermined and undervalued environment agencies the start-up funds they need. It would also be addressing the underlying causes of insecurity, and thus reduce the strain on existing security agents.

Initial scoping studies will need to be funded and supported by the Federal Government to satisfy UN information requirements and allow for proper planning of a carbon credit programme. Once carbon credits can begin to be traded internationally, finances will be generated for conservation projects.

Enforcement of fines for gas flaring can generate more than US$1 billion a year. In addition, a negotiation can be made with international oil companies for historic reparations.

The value of gas burnt per year is $800 million.

Making the gas available for third-party actors to carry out electricity projects will inject this currently wasted resource into the domestic economy, which can sustain itself with revenue generated. Initial start-up costs of utilisation projects must be funded, credited, or at least guaranteed. The potential to generate 27,000 MW by utilising the gas is an attractive prospect.

Clean-up of oil spill operations should be funded by the operating company specific to pollution sites as outlined in the Environmental Guidelines and Standards for the Petroleum Industry in Nigeria (EGASPIN).

An Oil Spill Liability Trust Fund (outlined under the NOSDRA Amendment Bill) would create an environmental insurance bond that would give the government the resources to quickly respond to and clean up spills and then recoup the money from the polluter afterwards. A similar fund in the US was supported by a tax of $0.05 on a barrel of oil produced and petroleum products imported. Nigeria could thus generate $36.5 million per year and within 5 years have a sustainable independent oil spill response fund. Due to the size of this fund special measures would have to be put in place to ensure transparent and accountable use. Such a fund could also be reinforced by further improvements oil spill management and response.

Shell International/SPDC is already believed to have set aside funds for dealing with both emergency measures and a substantive clean-up outlined by the UNEP. There is an urgent need for the Federal Government, NNPC and Shell to reach a conclusion on funding and make it available in a way that accelerates implementation of the work needed.