



## 9 STAKEHOLDER CONSULTATION AND ENGAGEMENT

### 9.1 Introduction

Consultation with local communities and other stakeholders is a key feature of NLNG's corporate policy. The aim of consultation is to gather information on issues, concerns and lessons learned by dialogue with the stakeholders. The company then looks towards working with the stakeholders to identify methods of addressing any negative impacts and to identify ways to maximise the positive benefits. This allows NLNG to maintain good public relations in the areas of operation and has, in the context of the **SevenPlus** Project, helped to ensure that the ESHA addressed the most important community concerns.

The intention of the stakeholder consultation process is that it would:

- Be transparent in order to build trust and also allow for effective communication channels to be set up with key stakeholders;
- Be informative so that participants are fully aware of NLNG's intended activities;
- Develop iteratively and interactively in order to allow sufficient time for participants to fully understand and respond to the issues.

The **SevenPlus** Project consultation programme was developed to address the concerns and views of both primary and secondary stakeholders. NLNG's Technical Advisers drafted a long list of stakeholders and proposed a mapping. These proposals were discussed in detail with NLNG in a workshop on Bonny Island on 12-13 May 2005. At the workshop the list and maps were amended and completed. In addition, an engagement action plan was initiated, which was to become the basis for all future engagement activities, owned and managed by the Steering Committee for Engagement. This stakeholder consultation programme is described in the *Stakeholder Identification and Management Plan (SIMP)* presented in Appendix 18 (Ref. 9.1). All consultations were done in close cooperation with NLNG's Community Relations Department, which maintains cordial relationships with NLNG's host communities, with NLNG's Health, Safety, Environment and Quality Department and NLNG's Technical Advisers.

### 9.2 Process of stakeholder engagement

The following sections describe the meetings and workshops carried out between NLNG and Government, and between NLNG and local communities, including representatives from NGOs. These meetings are summarised in Table 9.1 below.

<i>Date</i>	<i>Place</i>	<i>Stakeholders</i>	<i>Purpose of the meeting</i>
<b>2005</b>			
June 7, 2005	Ministry offices in Abuja	FMEnv	Introduction of Train7+ developments
June 9, 2005	Bonny Town	Chiefs' Council	Introduction of Train7+ developments
July 10-11, 2005	Meridian Hotel Port Harcourt	BECC/BKDC/FDC	BECC/BKDC audit of earlier commitments by NLNG, on behalf of Chiefs' Council
July 12, 2005	NLNG offices Bonny	Meeting with PD NLNG	Determine strategy
July 13, 2005	NLNG offices Bonny	Meeting with FMEnv and RSMEnv	Update Ministries on progress of environmental issues
July 14, 2005	RSMEnv offices Port Harcourt	Meeting with Commissioner RSMEnv	Introduction of Train7+ developments
August 1, 2005	NLNG offices Bonny	Scoping meeting critical stakeholders	Allow stakeholders to raise issues and concerns for Train7+
September 9, 2005	FMEnv office Abuja	FMEnv	Scope Agreement
September 28, 2005	NA	Public	Announcement in newspapers for Invitation for Expression of Interest for FEED and EPC



<i>Date</i>	<i>Place</i>	<i>Stakeholders</i>	<i>Purpose of the meeting</i>
<b>2006</b>			
January 18-19, 2006	NLNG offices Bonny	BECC/BKDC/FDC	Introduce BECC/BKDC/FDC to the proposed baseline work. Prepare for Chiefs' Council meeting following day.
January 2006	Bonny	THE SETTLEMENT	Start of fieldwork on social issues; inform people of THE SETTLEMENT about consultation process and field questions
January 2006	Bonny	FMEEnv and RSMEnv	Field visit for first round of baseline fieldwork
February 2006	Bonny	Shanty towns	Letters from THE SETTLEMENT and Lighthouse following start of fieldwork about their concerns
February 15, 2006	Abuja	FMEEnv	Present HSE premises to FMEEnv. Announce waiver application
March 2006	NA	FMEEnv	Waiver application for bush clearance
March 13, 2006	Lagos	DPR	Introduce the project to DPR
June 9, 2006	NLNG offices Bonny	BECC/BKDC/FDC	Clarification meeting on carrying capacity study
July 19- July 21, 2006	Netherlands, United Kingdom	FMEEnv, RSMEnv	Alignment on ESHA progress and FEED. Knowledge sharing on various subjects.
August 25, 2006	NA	FMEEnv	Letter from Ministry granting waiver with conditions.
October 12, 2006	Bonny	FMEEnv, RSMEnv BECC/BKDC/FDC Finima Nature Park	Inform stakeholders about progress of ESHA process and discuss Impact tables. Also brief update by NLNG on pending issues. In addition, get feedback from Stakeholders on these issues.
<b>2007</b>			
March 2, 2007	Abuja	FMEEnv	On request of FMEEnv, update them on ESHA progress and results.
April to July, 2007	Bonny	Brown House Youth Council (New Finima), BECC, Chief Council Brown House (New Finima) & Elders Brown House (New Finima)	Several meetings and communications regarding the pre-FID works (site preparation and soil investigation), land ownership issues and legacy issues from previous phases, carrying capacity study, payments of homage. The meetings/interactions resulted in stoppages and re-starts of these works.
October 30-31, 2007	Lagos	BECC	On request of BECC, in-house review of ESHA findings (by BECC).
December 5, 2007	Bonny	BECC, RSMEnv, FMEEnv, BKDC, FDC, MFCSN, NDWC, BGL, BLGC, FWA	Present ESHA findings.
December 7, 2007	Abuja	FMEEnv	Present ESHA process and schedule.
February 4, 2008	Bonny	BECC, BKDC, FDC	On request of BECC, pre-meeting to address sand sourcing. The meeting was also to discuss the ESHA draft report.
February 13, 2008	Bonny	BECC, RSMEnv, FMEEnv, BKDC, MFCSN, NDWC, BLGC, FWA, BWPM, NGO (Dr Adefemi), DPR, LGA, BYF, FYA	Present findings from ESHA draft report.
February 26, 2008	Abuja	Hon. Minister of Environment, Housing and Urban Development, FmEnv	Present ESHA draft report - findings, process and schedule.

Note: NA=Non-applicable

Table 9.1. Stakeholder engagement register



### 9.2.1 Engagement with Government

#### ❖ *Announcement of **SevenPlus** Project developments*

A formal visit was made to FMEnv on 7 June 2005 to update them on the latest expansion plans of Nigeria LNG Ltd. and to present the scope of the Project and the phases of the ESHA and plans for issue [PCO1] and stakeholder management. NLNG proposed a list of “givens” and “boundaries” for project sustainable development, which were agreed to by FMEnv.

“Givens” were:

- Project will adhere to Nigerian laws/regulations and international guidelines;
- Project will contribute to the overall reduction in greenhouses gases.

“Boundaries” were:

- Project will adhere to NLNG policies and standards;
- Project will not replace long-standing communities, but shanty towns may be impacted;
- Project will be acceptable to local communities.

It was initially proposed that the scope of the **SevenPlus** Project would be similar to the earlier Trains 4, 5 and 6 with possible larger (doubled) capacity. Specific issues include additional land take and a new jetty, increased marine traffic, social impacts of increased noise, increased emissions and location of risk contours vis-à-vis the current fence line, THE SETTLEMENT, Mobil airstrip and labour camp; and community benefits. Specialised baseline studies would be required to address noise and air quality, along with ground truthing surveys to fill in information gaps on developments in nearby communities and on the new land to be acquired. The SIMP would be updated to identify and map stakeholders, especially the critical stakeholders, for engagement during the **SevenPlus** Project. NLNG informed FMEnv that it would be applying for a waiver for site preparation activities and the reasons for the waiver. The waiver was granted on 31 March 2006.

After the presentation the FMEnv compiled a comprehensive list of questions regarding the social and environmental impacts of the **SevenPlus** Project itself and in relation to trains 1-6. These issues are grouped according to topic and summarised in Appendix 19 with a reference indicator identifying the chapter in which each issue is addressed. Topics include: issues related to master planning, physical resettlement, management of the nature park, land ownership and use, security, alignment with other industries on the Island, and so forth.

A second important meeting was convened on 13 July 2005 to inform the FMEnv and the Rivers State Ministry of Environment (RSMEnv) about the progress of the ESHA scoping process. The Ministries raised three main issues: concern about the process of relocating residents of THE SETTLEMENT, concern about Mobil's plans to temporarily move its staff to its airstrip which is slated for relocation, and the application process to formalise the ESHA. It was agreed that NLNG would submit to FMEnv a TOR for the EIA, which upon finalisation would serve as the minimum requirements to be met. The following day a meeting took place with NLNG and the Commissioner of Environment and Department Directors in Port Harcourt. Issues focused on the implications of expansion on the environment; technical aspects, e.g. flaring, air and water-cooling, channel deepening; and social impacts. The Commissioner stated that she was very happy with NLNG's performance to date.

On 20 September 2005, FMEnv gave their official approval of the TOR for the EIA on the condition that NLNG would incorporate various issues into the study, such as traffic congestion caused by the expansion, effect of traffic on fishery activities, heat disposal and noise modelling, resettlement impacts, spatial boundaries of impacts, mercury bed management, effects of expansion on the Nature Park, outstanding issues from the existing trains, cumulative effect of the project on the social life of Bonny Island and labour camp residents, and mitigation measures for the construction of the new jetty.



❖ *Meeting with FMEEnv on HSE Premises and specific issues of concern*

In mid-February 2006, NLNG updated FMEEnv on the status of project development and the EIA, and briefed them on the purpose, method and content of the HSE Premises for **SevenPlus** design and operations (see Appendix 11). NLNG gave a presentation on the then current noise and emissions contours indicating the necessity for an updating of noise and NO<sub>x</sub> modelling and consequent mitigation measures. The issue of flaring was also discussed. FMEEnv emphasised that they want to be involved in the resolution of these issues and to meet with technical experts. In response, NLNG invited representatives of FmEnv and RSMEnv to a three-day workshop held in London and The Hague from 19-21 July to share knowledge on the above subjects and to reconfirm alignment on the ESHA process.

❖ *Meeting to update FMEEnv on ESHA progress*

In early March 2007, NLNG gave a presentation to FMEEnv on the ESHA focusing on the issues FMEEnv requested be addressed in the study's scope. NLNG reported that no significant increase of traffic congestion is expected during construction and operation with negligible impacts on road safety and some effects on fisheries because of increasing safety zones; heat from fans and flare stacks will have no noticeable effect on ground level temperatures outside the NLNG plant; relocation of THE SETTLEMENT is not necessary based on the updated QRA risk contours; noise modelling incorporating noise reduction measures is continuing; mercury beds are to be stored in ISO containers; the nature park will not be affected by the expansion; and that the impact assessment in Chapters 6 and 7 will address cumulative aspects of **SevenPlus** developments on the social life of Bonny Island and effects of the jetty construction on fisheries. FMEEnv stated in the meeting that they were satisfied with progress.

❖ *Presentation of the draft ESHA to Hon. Minister of Environment, Housing and Urban Development and meeting with FMEEnv*

The findings of the ESHA were presented to the Minister and subsequently discussed with representatives of the Ministry (EIA department) on 26 February 2008. The presentation and the meeting were successful and comments were incorporated into the draft ESHA. Specifically, NLNG expanded the assessment of cumulative effects in Chapter 6. Further details are provided in Appendix 19.

### 9.2.2 Engagement with local communities

Bonny Chiefs Council has set up, and delegated responsibility to the Bonny Kingdom Development Council (BKDC) to manage, coordinate and facilitate planning and development issues pertaining to society and the lives and culture of the people. Bonny Chiefs Council has also set up, and has delegated responsibility to, Bonny Environment Consultants Committee (BECC) to manage, coordinate and discuss all environmental issues pertaining to the local community. BECC also represents the Bonny Indigenous Fishermen Committee (BIFC). More information on the Bonny Island traditional authorities can be found in Chapter 4.

NLNG's Community Relations Department and the HSEQ group deal with BKDC and BECC on all issues relating to people and the natural environment respectively. BKDC and BECC then communicate the outcome of these discussions and decisions to Bonny Chiefs' Council.

The Finima Development Committee (FDC) deals with issues pertaining directly to the Finima community. These parallel the interests and responsibilities of BKDC and BECC specifically for the Finima community, its people and environs. The FDC deals directly with NLNG on issues which may have an impact on their community and also deals with and communicates directly with Bonny Chiefs' Council on these matters.

The next paragraphs describe the sequence of meetings, which took place with Chiefs and representatives of the local community from June 2005 to June 2006 to ensure that the local community was properly informed about **SevenPlus** and that their views were fully taken into account.



❖ *Visit to the Chiefs Council with members of BECC and BKDC present*

On 5 June 2005, NLNG paid a visit to the King's Palace in Bonny Town to introduce the development of the **SevenPlus** Project. Representatives of the Chiefs Council, BECC and BKDC stated that NLNG had not complied with its earlier commitments and will withhold engagement in the **SevenPlus** Project until an independent audit has been carried out resulting in a positive outcome. The Council requested that a representative of the Council serve on the audit team. The Council also provided a list of questions to be addressed by the EIA. Their concerns largely focused on the legal basis for land acquisition from SPDC, overcrowding on the Island, social impacts including relocation of New Finima and economic benefits, and cumulative effects of all industries operating on the Island. These issues are summarised in Appendix 19. The Council also indicated that BECC and BKDC would represent the Chiefs Council on issues relating to the **SevenPlus** Project and that they are to be engaged in informing the Council about Project alternatives and other decision-making processes.

❖ *Meeting with BECC, BKDC and FDC to discuss previous commitments*

At this meeting, which took place on 10-11 July 2005, it was agreed that agreements reached between NLNG and Bonny Kingdom at the November 4, 2004 meeting would be reviewed. The agreements spanned a number of issues concerning employment of indigenes, community development plans, economic empowerment, upgrading of Bonny General Hospital, and various environmental matters. Decisions about how NLNG would proceed with each of the issues raised were reached at the meeting.

❖ *Scoping meeting with critical stakeholders*

Over 100 critical representatives of stakeholders convened on the NLNG site on 1 August 2005 to learn about the **SevenPlus** Project and current and planned community developments and to voice their concerns. A brochure was distributed before the presentation. The stakeholders, representing a wide spectrum of nearby communities and NGOs, including youth, women, fishermen, foresters, and conservationists, raised a number of issues directly related to the impact of the **SevenPlus** Project on their respective interests. These issues have been incorporated into Appendix 19 and include spatial, health, and security impacts of migrant influx, impacts of the jetty and other activities on local fisheries, community benefits for the education sector, and resettlement. The scoping meeting was deemed successful by the President of the Mangrove Forest Conservation Society of Nigeria (MFCSN), who stated in an email to NLNG's HSEQ Manager that "NLNG has shown new commitment and honest disposition to address the concerns of all stakeholders." Previously, during the **Plus** Project, the President of the Conservation Society had strong reservations that resulted in parliamentary questions in the Netherlands.

❖ *Alignment meeting to discuss baseline studies field work*

The purpose of this meeting was to introduce the contractors selected for the baseline studies fieldwork to BECC/BKDC/FDC. The meeting was held on 18 and 19 January 2006 in Bonny. Professors Odu (Ecosphere) and Alo (Babsal) each gave a short presentation on their upcoming studies. Representatives of the communities expressed their dismay that they were not given an opportunity to review the TOR for the ESHA prior to this meeting. They wanted confirmation that all the issues raised by stakeholders would be addressed in the ESHA process. NLNG assured them that this would be the case and agreed to write a letter to the contractors confirming their responsibility to address all issues raised. It was also agreed that NLNG would carry out a safety/security study on the Island and a Carrying Capacity Study (CCS) to determine if Bonny Island can handle the planned expansions of all industries in a sustainable manner (The CCS is outside the scope of this ESHA). At the end of February 2006, the Bonny Environment Consultative Committee sent a letter to NLNG stating that (i.) the safety/security issue is urgent and needs to be addressed in the ESHA; and (ii.) the ESHA should also address whether Bonny Island can feasibly accommodate cumulative impacts from on-going and planned developments.



❖ *Announcement of social and health baseline field work in THE SETTLEMENT*

In the third week of January 2006, representatives of FMEnv, Ecosphere, Babsal, and Finima community held a meeting with residents of THE SETTLEMENT to announce the field work activities and introduce the **SevenPlus** Project. The Chiefs of the three SETTLEMENT communities were present. After Ecosphere consultants gave a short presentation about the Project, the community was invited to ask questions and provide feedback. Their main concerns were their potential resettlement and terms of compensation, and poor health and sanitary conditions in the shanty towns. On 3 February 2006, the Chief of Bonny Light House Community wrote a follow-up letter to Ecosphere reiterating their need for social amenities in the form of pipe borne water, sanitation, materials and books for the primary school and health assistance to combat skin diseases, diarrhoea and measles. Also on 3 February, the Chiefs of THE SETTLEMENT communities 1, 2, 3 sent a letter to Ecosphere requesting that the communities and Calabar camps are duly compensated by NLNG in the event of their physical relocation.

❖ *Clarification meeting on the Security/Safety and Carrying Capacity Study*

On 9 June 2006, a meeting was held in Port Harcourt between the executives and members of BKDC, BECC, FDC, and NLNG. NLNG's acting Production Manager chaired the meeting. The purpose of the meeting was to clarify the local community's input to the security/safety study and the CCS. The community's concerns focused on the following issues:

Security and Safety:

- Growing population and activities associated with social crimes
- Risk to life and livelihood of indigenes in the event of a major disaster
- Encroachment into otherwise safe zones as a result of expansion
- NLNG versus ExxonMobil risk contour and implication for Finima community
- Carrying Capacity:
- Extent of future development and land take by operating companies against "uncontrolled expansion"
- Continued dredging activities in the Bonny Channel and fear of major flood
- Simultaneous expansion of the major companies without proof of joint approach or community knowledge

NLNG showed BKDC, BECC and FDC the facility risk contours and indicated that they present a low risk to the community. The Company also reassured the community representatives that NLNG does not process chemicals which may jeopardize the safety of the environment and people. The meeting was also informed that detailed work has taken place on the Bonny Emergency Response Plan and procedure in line with the community's request for a Contingency Plan for Disaster. Further, a Bonny Island Emergency Mutual Aid Scheme, involving JIC and coordinated by NLNG, would be fully operational by the end of 2006. NLNG agreed to prepare a scope for the security/safety and CCS within the next two weeks. It was also acknowledged that these issues are outside the scope of the ESHA study for **SevenPlus**.

❖ *Feedback session on the ESHA impact tables and process overall*

A stakeholder meeting took place on 12 October 2006 between NLNG, Ecosphere and Babsal consultants, BECC/BKDC/FDC, FMEnv, and representatives from the Niger Delta Wetland Centre to discuss the impact tables and pending issues with regard to the ESHA. At the outset of the meeting, the community representatives, BECC/BKDC/FDC demanded resolution of unfulfilled community commitments made by NLNG before engaging in a discussion of the impact tables. As a result, the community members were able to voice their frustration over certain issues but the impact tables were not discussed and only brief remarks were made about the ESHA process. Since then, NLNG has taken steps to solve pending issues with local communities.



❖ *BECC in-house review meeting*

BECC requested for a possibility to review the ESHA findings prior to the full primary stakeholder meeting. This in-house review took place in the Sheraton hotel in Lagos on 30 & 31 October 2007. The pre-reading for the meeting comprised the preliminary text of the impacts and mitigations (chapters 5 and 7). The main issues from this meeting are included in Appendix 19 and concern various items to be resolved before the full primary stakeholder consultation (and the ultimate issue of the EIA to the FMEnv).

❖ *Stakeholder consultation meeting*

A stakeholder consultation meeting was planned to take place on 5 December 2007. The following primary stakeholders were invited to the meeting: BECC, RSMEnv, FMEnv, BKDC, FDC, MFCSN, NDWC, DPR (Port Harcourt and Lagos), BGL, BLGC, BWPM, BKEB, BYF, FWA and the FYA. THE SETTLEMENT was not invited. Table 9.1 lists the participants. About 1 week prior to the meeting, NLNG sent invitations and provided extracts of the Executive Summary as pre-read material. The executive summary included a listing of the mitigation measures. At the beginning of the meeting BECC expressed concerns/issues, mainly related to dredging, information provision and communication, see Appendix 19. Participants agreed not to continue the meeting but instead, re-schedule to January 2008.

❖ *BECC pre-meeting*

BECC requested a pre-meeting, prior to the larger stakeholder consultation meeting planned for a week following, to close-out the concerns expressed during the 5 December 2007 meeting. A secondary aim was to review the draft ESHA report that was issued to BECC for consultation on 19 December 2007. During the pre-meeting, BECC announced to issue a report on the ongoing reclamation works (Ref 9.8). The report would include the sand sourcing issues that were recognised by BECC as an omission in the ESHA report. BECC requested to include their report in the ESHA report. This meeting took place on Bonny Island on 4 February 2008.

❖ *Stakeholder consultation meeting (continued)*

The last stakeholder consultation before the issue of the EIA document to the Ministry took place on 13 February 2008. The same primary stakeholders were invited as for the 5 December 2007 meeting. Representatives of THE SETTLEMENT were again not invited. Table 9.1 gives the actual list of participants. Pre-read material comprised the draft EIA report, issued “for consultation” (to BECC only) just before Christmas 2007. Appendix 19 gives an overview of the questions and comments raised by stakeholders and action taken or announced by NLNG.

### 9.3 Stakeholder Issues

A major area of concern pertaining to stakeholder issues is the non-implementation of agreed actions by NLNG. The resolution of these issues is progressing, as BKDC/BECC/FDC and NLNG have developed action plans for specific deliverables. In the future, both NLNG and BKDC/BECC/FDC have agreed to keep accurate records on the nature and time scale of the new commitments so as to pre-empt any misunderstandings. Community stakeholders are keen to see the real benefits the **SevenPlus** Project will provide to Bonny Kingdom. They want to see greater employment opportunities and improved community services, such as better health care and schools, increased street lighting, proper waste disposal facilities, piped water, etc. In short, they expect NLNG to provide them with a better quality of life.

The topics addressed below refer to issues raised by the critical stakeholders (government and community) during the pre-scoping and scoping meetings. **A summary of the issues and the number of the Chapter where each issue is addressed in this Report can be found in Appendix 19.** In Appendix 19 it is also indicated which issues are outside the scope of the ESHA, such as community concerns over the carrying capacity of Bonny Island, and are therefore not elaborated upon here.



❖ *Master Planning and land take and use*

At the time NLNG announced the preparation of the **SevenPlus** Project, FMEnv was concerned about the regulatory requirements associated with the Project. For instance, they wanted assurance that there would be sufficient space on the Island to accommodate the **SevenPlus** facilities and that the location of the plant took into account the (draft) Bonny Master Plan (Ref. 9.5). They were also interested in NLNG's plans for the acquisition of new land from the other industries/communities on the Island and wanted assurance that any land transactions would be legal and not infringe on the property rights of owners, including land originally owned by local families. Issues of overcrowding and management of cumulative impacts from all operating trains were also raised by the Chiefs' Council. They requested that alternative locations on the Island for the **SevenPlus** Project be investigated, and FMEnv recommended that locations west of Bonny River be considered.

Local communities stopped the site clearance work in Area 3 (see Fig. 3.5) almost immediately after commencement in May 2007. Reason was reportedly land ownership related issues.

❖ *Social and environmental impacts*

Government and community representatives alike expressed their concern over the effects of the expansion on inhabitants' quality of life and on the biodiversity of the Finima Nature Park. Community safety in the event of an emergency was an important issue and the need for a community emergency response plan was mentioned. Stakeholders also expressed their concern over increased waste, noise, heat, and air emissions from the expansion and their associated health and environmental effects. Flaring continued to be a major issue to the stakeholders, some of whom stated they were seriously worried about how the flare may contribute to poor health outcomes. Conservation activists stated their opposition to any encroachment of the Project into Finima Nature Park.

❖ *Migrant influx*

The arrival of newcomers to the Island presented a concern to Bonny indigenous population and their representatives. They seek to preserve the Igbani language native to Bonny and cultural norms and traditional lifestyles, which they feel are eroding away with the introduction of new value systems held by the foreigners. Government representatives wanted assurance that NLNG would be able to support the larger work force required for construction, such as space in the existing labour camps, provision of health services, transportation requirements, etc. They also recognised that increased populations produce more waste which must be disposed properly and expose existing residents to new diseases. Bonny Islanders were also concerned that the influx of migrants seeking employment with **SevenPlus** construction activities and their followers would increase the number of shanty dwellings and proliferate informal service activities, such as prostitution, or other money making activities that may compete with the formal business sector (e.g. the running of roadside kiosks and bars). One stakeholder remarked, "The original inhabitants of Bonny Island do not share enough in the economic burst caused by the industrial developments: money is not spent on Bonny markets and in Bonny shops, but in Port Harcourt and abroad." Bonny indigenes also feel that they compete with outsiders for jobs.

❖ *Employment*

Bonny people continue to pressure NLNG to employ residents from Rivers State, Bonny indigenes and recent technical graduates, in particular. They are also concerned about the employment status of the indigenes; they particularly desire that the Bonny indigenes will be placed in management positions and request that contract staff who are indigenes be converted to permanent staff. The impact of **SevenPlus** activities on the livelihoods of artisanal fishermen who will have less access to the sea as a result of the jetty, increased shipping traffic, and potentially lower fish stocks, was also raised as a key employment issue.



❖ *Quality of primary and secondary education*

Community residents requested NLNG support to local education at the primary and secondary levels in the form of better infrastructure, provision of furniture, and books, and in teacher re-training courses to enhance teachers' capabilities.

#### 9.4 NLNG community development

❖ *Overview of NLNG Corporate Investment Programmes*

Since the commissioning of the **Base** Project in September 2000, the Company, as a member of JIC, has been participating in Memorandum of Understanding (MOU) projects (Ref. 9.7). These include: construction of link roads, replacement of existing power distribution network in Bonny, etc. NLNG has invested heavily in community programmes on Bonny Island. Some of the more important programmes are briefly reviewed after Table 9.2. This Table presents a comprehensive list of community investment programmes and projects undertaken by NLNG or by JIC. NLNG's Community Relations Manager presented this Table to the *Amayanabo* and his Council of Chiefs.

S/No.	Project	Sponsor	Project scope	Status	Comment
<b>Education</b>					
1	Education Support (Scholarship)	NLNG		2000-2 (296 Bonny Indigenes) Ongoing	
2	Education Support (Teachers Salaries)	NLNG		Ongoing and re-invigorated	
3	Exercise Books to Schools	NLNG		Ongoing	
4	School Desks to Schools	NLNG		Ongoing	
5	Construction of Principal & V. Principal Qtrs. (Govt. Girls' School Finima)	NLNG		Completed	
6	Construction of Principal & V. Principal Qtrs. (Bonny Nat. Grammar School)	NLNG		Completed	
7	Rehabilitation one block of 4 Classrooms (Govt. Pry School Bonny)	NLNG		Completed 2006	
<b>Health</b>					
1	Health Monitoring and Service: Upgrade of Bonny and Finima Health Facilities	NLNG /SPDC		Contracts awarded in 2005	Agreement item Integrated approach between NLNG, SPDC and NLNG Ladies Association on rehabilitation of BGH initiated to ensure consistency of quality.
2	Construction of Doctors' Qtrs. (Bonny General Hospital)			To be completed Q3 2007	
3	Construction of Nurses' Qtrs. (Bonny General Hospital)	NLNG		To be completed Q4 2007	Agreement item
4	Construction of Mortuary (Bonny General Hospital)	NLNG		To be completed Q2 2007	Agreement item
5	Construction of Drainage System (Bonny General)	NLNG		Completed	Agreement item



S/No.	Project	Sponsor	Project scope	Status	Comment
	Hospital)				
6	Building Re-roofing and refurbishment of Bonny General Hospital	NLNG-NPP		Completed 2006	<b>Plus</b> Project agreement item Engagement with RS MOH to ensure sustainability beyond upgrade has started
7	Water; electricity, etc. of Bonny General Hospital	NLNG		Completed	Agreement item Engagement with RS MOH to ensure sustainability beyond upgrade has started
8	Procurement of Hospital Equipment (Bonny General Hospital)			Procured, to be formally handed over Q2 2007	
9	Fencing of Finima Health Centre	NLNG		Completed 2006	
10	Construction of Nurses' Qtrs. (Finima)	NLNG		Completed 2006	
11	HIV/AIDS Awareness & Enlightenment Campaign	NLNG		On-going	
12	National Immunisation Campaign	NLNG		On-going	
<b>Social / Environmental</b>					
1	Construction of Information Centre (Bonny)	NLNG		Under review with BKDC and FDC	Agreement item
	Development of Rural Roads:				
2	Coal Beach Roundabout Road	NLNG	Concrete Pavement	Completed	
3	Finima Road	NPP	Road Repairs	Completed 2006	<b>Plus</b> Project agreement
4	Finima Road	NPP- <b>Six</b>	Road Repairs	Ongoing	Scheduled completion Q1, 2008.  <b>Six</b> Project agreement
5	Court Road	NLNG	Repairs Concrete Pavement	Completed	
6	Lecox & Iowari Road	NLNG	Concrete Road Repairs	Completed	<b>Expansion</b> Project agreement
7	New Layout/King Jaja Road Repairs	NLNG	Road Repairs/ Drainage	Completed	<b>Expansion</b> Project agreement
8	Park Road	NLNG	Upgrade: New Concrete Road/Drainage	Completed	<b>Expansion</b> Project agreement
9	Vocational School Road	NLNG	Upgrade: New Concrete Road	Completed	<b>Expansion</b> Project agreement
10	Government School/Hospital By-pass	NLNG	New Concrete Road/Drainage	Completed	<b>Expansion</b> Project agreement
11	King Perekule Road	NLNG	Concrete Road Repairs	Completed	<b>Expansion</b> Project agreement



S/No.	Project	Sponsor	Project scope	Status	Comment
11	Finima-Bonny Road	NLNG	Concrete Road Repairs	Completed	<b>Expansion</b> Project agreement
12	Ikuba/Allison Squares	NPP	Repairs	Ongoing	<b>Plus</b> Project agreement
13	New Jerusalem Road - Bonny	NPP- <b>Six</b>	Construction	Ongoing	Scheduled completion Q2, 2008 <b>Six</b> Project agreement
	Other facilities				
14	Procurement of Storage Water Tanks (28+)	NLNG	Plastic 5,000 litre Water Tank	Completed	
15	Provision of Water Tankers in the communities.			On-going	32 Tankers operating from NLNG RA.
16	Bonny Shopping Mall For women	NLNG	Building with 13 Stores, Restaurant & Kitchen	Completed	BKDC was not consulted
17	Cold Store	NLNG	2 Wall Mounted Cooling Units	Completed	
18	Rehabilitation of Finima Market	NLNG	Renovation of Units/Toilets/Overhead Tanks & Abattoir	Completed 1999	Not in use <b>Base</b> Project agreement
19	Generator House (Kuruama)	NLNG	Building, Burglar Proof Door, Windows & Store	Completed 1999	<b>Base</b> Project agreement
20	Generator House (Ayaminima)	NLNG	Building, Burglar Proof Door, Windows & Store	Completed 1999	<b>Base</b> Project agreement
21	17kva Gen set for Kuruama	NLNG		To be delivered	
22	Police barrack quarters (Bonny)	NLNG		Completed 1999	<b>Base</b> Project agreement
23	Fencing of Bonny L.G.A. (Bonny)	NEP		Completed 2001	<b>Expansion</b> Project agreement
24	Community Hall (Abalamabie)	NLNG	Building with Hall Office, Toilets etc	On-going	BKDC was not consulted
25	Cargo Boats for F.W.A.	NLNG	Finima	Completed	
26	Provision of 4 'Ibanise' passenger Boats	NLNG		Operation of Boat suspended due to marine accident in 2005.  Joint accident investigation concluded. To be relaunched after a sustainability plan/strategy has been done by NLNG/BKDC	Agreement item
27	Provision of 5 fishing boats annually to fish men	NLNG		Ongoing	
28	Local Government Head Qtrs Fencing (2002)	NLNG	Material Supplied for Fencing Wall, Gates/Guard Houses	Completed	BKDC was not consulted.
29	Football Pitch Grassing & Constr. of Spectators' Stand (Finima)	NLNGs	Re-grassing of Pitch/Spectator' Stand (3-5 Stairs)	Construction ongoing, to be completed mid 2007	
30	Waste disposal Facility	NLNG	Strategy to convert	Design on-going	



S/No.	Project	Sponsor	Project scope	Status	Comment
			waste to wealth being reviewed		
31	Removal of Solid Wastes	NLNG		Continuous	
32	Water Distribution to Akiama and Oguede	NLNG	Distribution Line/Tie into NLNG Borehole	Devon holds pending compl. of borehole	
33	Employment of 30 Rivers Graduates (18 Bonny).	NLNG		Completed 2003	
34	Employment of Semi – Skilled and Unskilled Staff	NLNG		Ongoing	In conjunction with BKDC by Major and Sub contractors
35	Provision of Water Tankers in the communities.	NLNG		Ongoing	32 Tankers operating from NLNG RA
36	Reclamation of 10 hectares New Finima	NPP		Completed 2005	<b>Plus</b> Project agreement
37	Reclamation of 14 hectares Bonny	NPP		Completed 2005	<b>Plus</b> Project agreement
38	Reclamation Bonny phase 2	NPP- <b>Six</b>		To be started	Scheduled completion Dec 2007 <b>Six</b> Project agreement
39	Shore protection New Finima	NPP		Completed 2005	<b>Plus</b> Project agreement
40	Shore protection Bonny	NPP		Completed 2006	<b>Plus</b> Project agreement
41	Continuation of Shore Protection - Bonny	NPP- <b>Six</b>		Ongoing, about 40% completed	Scheduled completion Q1 2008 <b>Six</b> Project agreement
42	New Finima field up-grade	NPP		Ongoing, about 85% completed	<b>Plus</b> Project agreement
43	Housing Layout - Bonny	NPP- <b>Six</b>		To be started	Scheduled completion Q4 2008 <b>Six</b> Project agreement
44	Sports Hall – New Finima	NPP- <b>Six</b>		To be started	Scheduled completion Q3 2008 <b>Six</b> Project agreement
45	Trailer Park – New Finima	NPP- <b>Six</b>		To be started	Scheduled completion Q2 2008 <b>Six</b> Project agreement
<b>Economic empowerment</b>					
1	Micro-Credit Scheme	NLNG	248 group benefited with a loan value of N122 million	To be relaunched in 2007	



S/No.	Project	Sponsor	Project scope	Status	Comment
2	Employment of 30 Rivers Graduates (18Bonny).			Completed 2003	
3	Employment of Semi – Skilled and Unskilled Staff			On-going	In conjunction with BKEB by Major and Sub contractors
4	Patronage of local contractors			Being encouraged through Capacity Building and favourable contracting policies. Annual Capacity Building workshop for contractors initiated in 2004 and on going. All contracts below N10m to Bonny Indigenous Contractor.	
5	Provision of Small Vessels for patrolling the Exclusion Zone			Fish Catch Study Carried out.	Fishing boats and equipment donated periodically Awareness programs for Fishermen carried out annually. January and June 2006
6	Employment of Indigenes of the Community			Continuous.	Coaching for aptitude testing. Education training and scholarship for indigenes initiated for Maritime Academy Oron.
7	Nature Reservation Area			Completed 1999. Park operational since 2000 under Niger Delta Wetlands Conservation Centre (NDWC) management. Board of Trustees Park registration as a company limited by Guarantee awaiting approval by NLNG Board.	40 rangers are employed and patrolling the park and maintaining a nursery for indigenous flora and fauna. Community leaders and NLNG have endorsed 5-years Master plan, developed by NDWC. Contract for fencing, walkway and ranger huts awarded. <b>Base</b> Project agreement.
8	Increased access to forests on the Island			Complied with since 2001	Enlightenment session organised annually
9	Production of Acquisition Document for Coconut Estate			Completed 2000	
10*	Recognition of GTS Communities and projects in the communities.			GTS Communities recognized. (Peterside, Oloma, Ayaminima, Abalamabie, Olupiri, Akiama, Kuruama)	Projects and Programmes carried out in these communities.



S/No.	Project	Sponsor	Project scope	Status	Comment
11	Nigerian Labour Camp and the Environment			Labour camp in place since 2002. Super market and recreation facilities not in place as agreed	Discussion on-going on de-commissioning of camp.
<b>MOU under JIC (NLNG-50%; SPDC- 30%; MPN – 20%)</b>					
1	<b>Road Projects:</b>				
	Abalamabie Road 2.7km	JIC	Construction based on initial scope completed in 2002	Abalamabie Road Extension and Roundabout completed.	
2	Bonny By-Pass Roads 2.7km – Swamp Section - Beach Section (Sandfill area)	JIC	Contract awarded and contractor mobilized to site.	Awarded for completion in 2008	
			Construction on going	Completion due early 2007	<p><b>Bonny Utility Company</b> Operational since 2003; &gt;70 employees; revenue collected through pre-paid metering.</p> <p>JIC endorsed investment in a Phase II, which includes - Additional Power from NLNG to BUC: Q4'06. - Expansion of Contour to adjoining Areas in Bonny and to connect Finima to BUC. Target completion is Q3 2007.</p>
3	BONNY By-Pass Road A2	JIC		Beach/sandfill road 60% completed; Swamp road 10% completed	
4	<b>Water Projects:</b>				
	Water projects Rehabilitation of Bonny Water Treatment Plant	JIC		Refurbishment completed in 2002. Further upgrade carried out and completed in Q4 2006.	
5	Finima water project: Development of 2 No Water borehole	NEP/JIC		<p>Commended 2003.</p> <p>Borehole 1 completed in 2004</p> <p>Borehole 2 completed in 2006</p> <p>Contractor on site and drilled to 350m. Expected to reach 450m for TD. Completion in July, 2003.</p> <p>Water Board Support for Operation and Maintenance under BUC achieved; Implementation in Q1/Q2</p>	<p><b>Expansion</b> Project agreement</p> <p>Facilities hand over by Ministry of Water Resources Q4 2006</p>



S/No.	Project	Sponsor	Project scope	Status	Comment
				'06	
6	Bonny Water Project Phase 1	JIC		Construction on-going	
7	Bonny Water Project Phase 2	JIC		Construction on-going	
8	Upgrade Water Plant & Distribution Network	JIC		Completed	
9	Bonny Town Electricity Project	JIC		Initial scope exceeded in 2004/5. Over 7,500 customers 'hooked up'. Design and implementation of phase 2 to link adjoining areas in Bonny and Finima town being implemented.  Bonny-Finima Road Street lighting – On going	
10	Bonny Town Power Upgrade Phase 1	JIC		Completed	
11	Bonny Town Power Upgrade Phase 2 to cover Abalamabie and Finima.	JIC		Under review	Agreement item
12	Bonny-Finima Street Lighting	JIC		Construction on-going	Agreement item
13	High Voltage Power Distribution line Bonny to Finima	JIC		Construction on-going	
14	Generating Sets (Maintenance/Operations)	JIC		On-going	
15	Power Generation to Water well and Akiama	JIC		On order	
16	Bonny Master Plan	JIC		Completed 2002	

Table 9.2. Community social investment projects and programmes by NLNG and by JIC.

#### ❖ *The Micro-credit scheme*

In the bid to assist its host communities to raise funds to start business ventures NLNG set up in 2000 an ₦ 500 million micro-credit scheme. The applicants who were required to form co-operatives were subsequently trained in the various fields of interest, including agri/aquaculture community enterprises in transport, fishing, and food self-sufficiency. Some fields of interest required special training, which NLNG organised even in tertiary institutions. After the training, NLNG organised empowerment of qualified groups or co-operatives in batches. Batch one started in the year 2001, Batch 2 in 2002 and Batch 3 in 2003. The scheme ended in 2004 with 248 groups



having benefited in its three years of operation. The scheme may recommence in 2007 after review.

❖ *Community health programme*

On the 30<sup>th</sup> of May 2000 an agreement (the “Bonny Agreement”) was signed between the *Amayanabo* of Bonny Kingdom, and the Bonny Council of Chiefs, on behalf of the entire people of Bonny Kingdom and NLNG Limited. It states that NLNG shall undertake immediately the upgrading of the Bonny General Hospital and Finima Health Centre and for this purpose shall liaise with the Community through the BKDC. In compliance with this agreement, NLNG has undertaken extensive rehabilitation of the Bonny General Hospital and upgrade of the Finima Health Centre to ensure improvement in the delivery of primary health care to the community.

❖ *Health promotion*

Health awareness campaigns on HIV/AIDS and general health issues for youth on HIV prevention are continuously carried out in collaboration with the Rivers State Ministry of Health and consultants. A capacity building workshop on HIV/AIDS and STDs was held in August 2005 for 145 Youth Against Aids Club members and 15 coordinators/teachers from various secondary schools in Bonny and GTS communities. Also in August 2005 health awareness campaigns focused on healthy living were held in the following GTS communities – Emohua, Kalabari, Okrika and Abua kingdoms.

In addition, the Ibani-se HIV/AIDS initiative was launched in the 4th quarter of 2006. This NGO was set up through Bonny Community/JIC partnership to act as an advocacy and support group focusing on the fight against HIV/AIDS through sensitisation, testing, counselling and treatment. Since inception the Initiative has carried out advocacy visits, formed support groups for people living with HIV/AIDS, produced a video documentary, conducted a baseline prevalence survey, reached 500 persons and launched its own website ([www.ibanise.org](http://www.ibanise.org)) (Ref 9.2). The Initiative has the full support of the Bonny Kingdom and financial support of the JIC.

NLNG held a “Roll Back Malaria” campaign in May 2005 and sponsored a deworming programme for host communities in June 2005.

❖ *Water supply*

As part of its efforts to meet the promises made to Bonny indigenes regarding community development, the Joint Industry Committee (JIC) has commenced providing adequate and potable water on the Island. With the collapse of the government-built water borehole in Bonny, JIC had put mechanisms in progress to ensure adequate and potable water supply on the Island. Rehabilitation work in the Bonny Water Treatment Plant was completed in 2006. To support future development and for purpose of back-up a tanker loading bay was constructed at the Bonny Water Treatment Plant to complement water supply by tanker to Bonny and Finima towns. 31 Water Tankers are, through community contractors paid for by NLNG for water distribution to Bonny and Finima. The loading bay in Bonny became fully operational in 2006 while that of Finima is currently under construction.

In 2006 a new water treatment plant was constructed and commissioned for use in Finima. This was in addition to the rehabilitation of 2 boreholes and drilling of a new one. Potable water is now being distributed to areas with waterlines.

NLNG is currently sponsoring a survey to review and develop long term sustainability strategy for water reticulation, management and delivery on Bonny Island. The survey, which will address need, current and future requirements, will be completed by the 3<sup>rd</sup> quarter of 2007.

❖ *Electricity*

During the NLNG *Plus* baseline survey in 2001, power supply in Bonny Town and Finima was found to be unreliable, a malady that afflicts Nigeria as a whole. However, with the start up of Bonny



electricity project phases I in August 2003, Bonny Town, as a result of the activities of the JIC-sponsored, NLNG-run, Bonny Utility Company (BUC), began installing pay-as-you-go meters and charging for electricity. BUC is not yet operating in Finima because the people have not yet expressed a desire to have the pay-as-you-go BUC system. They rather prefer the completely free (even if not completely satisfactory) NLNG-sponsored service that they are enjoying now. In a bid to improve the service, NLNG has commissioned the supply of a large customized transformer without which the two large generators recently supplied by the company cannot operate. But as of October 2003, the contractor was yet to deliver the transformer. Today, BUC is fully operational and Bonny Town enjoys over 90% power availability this has been made possible by completion of power lines upgrade and hook up of the Injection Station to the NLNG power source to compliment current source from SPDC. In 2006 BUC recorded 1 million man-hours without a lost time injury. Between 2004/2005 over 7500 customers in Bonny Town hooked up to the Bonny Utilities Company power grid to date.

At the time of the **SevenPlus** ESHA, Finima Town is being powered through diesel generators with challenges associated with illegal connections and growth in population and business activities. The phase II of the electricity project to link up adjoining areas in Bonny and Finima Town is being implemented. For instance in 2005, construction work, to provide a more efficient power to Finima commenced with award of contract for the construction of a dedicated injection station in Finima. Civil works for the station have been completed, construction of power transmission lines including street lighting from Bonny to Finima town are in progress and will be completed in the 3<sup>rd</sup> quarter of 2007. It is expected that by late 2007 BUC will commence commercial operation in Finima as this is the only sustainable option for ensuring controlled usage and guarantee power improvement to the town.

#### 9.4.1 NLNG's community relations

Through its Community Relations Department, NLNG strives to maintain cordial relationships with its host communities. This makes good business sense, but it is also driven by NLNG's commitment to Sustainable Development. It is expressly stated in NLNG's Sustainable Development policy that the Company will apply the concept of sustainable development to all its projects and activities with the host communities. In pursuit of this policy NLNG wants to ensure – amongst other things – that all social management plans serve the goal of sustainable economic development in the host communities.

Furthermore, NLNG has established a Sustainable Development Co-ordination Committee (SDCC) to steer sustainable development and to co-ordinate NLNG's community projects and environmental protection activities. The General Manager of the Production Division on Bonny (PD) chairs this committee

#### 9.5 **TSKJ community development**

TSKJ is the EPC (Engineering, Procurement and Construction) contractor for the **Six** Project and has been the same for the previous projects (**Base**, **Expansion** and **Plus**). TSKJ and her subcontractors maintain their own relationships with the Bonny communities and have carried out, or are carrying out the following activities:

S/No.	NLNG Project phase	Sponsor	Project name / scope	Status	Comment
<b>Education</b>					
	<b>Base</b>	TSKJ-EPC	Award of Post Secondary Scholarships to Bonny Youths	Completed 1999	
	<b>Base</b>	TSKJ-EPC	Construction/Furnishing of Model Primary School Agaja	Completed 1999	
	<b>Base</b>	TSKJ-EPC	Pre-apprentice training programme for about	Completed	



S/No.	NLNG Project phase	Sponsor	Project name / scope	Status	Comment
			1,000 youths of Bonny/Pipeline Communities	1999	
	<b>Base</b>	TSKJ-EPC	Distribution of exercise books to Primary/Secondary Schools	Completed	
	<b>Base</b>	TSKJ-EPC	Renovated and upgraded Primary School in Kura-ama	Completed	
	<b>Expansion</b>	TSKJ-EPC	Vocational training school (Bonny)	Completed 2003	
	<b>Expansion</b>	TSKJ-EPC	Government school bye-pass road (Bonny)	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC, Marubeni	Donation of Computers to Secondary Schools	Completed 2002	
	<b>Expansion</b>	TSKJ-EPC	Donation of writing Desks to all Primary Schools in Bonny	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC	Donation of Books to Schools and Bonny Library	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC	Donation of Computers to Bonny Youths Federation's Youth training scheme	Completed 2002	
	<b>Expansion</b>	TSKJ-EPC	Craft training programme for 1,500 Bonny Youths	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC	Award of Scholarships to Bonny Students in tertiary institutions	Completed 2002	
	<b>Expansion</b>	TSKJ-EPC	Donation of books to schools and LGA library	Completed 2002	
	<b>Expansion</b>	MARUBENI	Donation of Computers/Printers for schools in Bonny	Completed 2001	
	<b>Expansion</b>	Fuogerolle	Backfilling of swamp and construction of road leading to CSS Abalamabie	Ongoing, about 65% completed	
	<b>Plus</b>	TSKJ-EPC	Award of Scholarships to Bonny Students in tertiary institutions	Completed 2005	
	<b>Plus</b>	DAEWOO-EPC	Construction of Admin/library one storey building for Community secondary school Abalamabie	Completed 2006	
	<b>Plus</b>	MARUBENI	Donation of Computers/Printers for training scheme New Finima	Completed	
	<b>Plus</b>	CIMIMUNTUBI	Renovation of Admin block Bonny National Grammar school	Completed 2003	
	<b>Plus</b>	CIMIMUNTUBI	Renovation of Christ Army Church Primary School Admin block	Completed 2004	
	<b>Plus</b>	Marubeni	Donation of Computers/Printers for training scheme Finima	Completed 2005	
	<b>Six</b>	DAEWOO-EPC	Construction of assembly hall at the community secondary school Abalamabie	Not yet started	Proposed
	<b>Six</b>	CIMIMUNTUBI	Renovation of Finima girls school class room	Completed	
	<b>Six</b>	Marubeni	Construction of 6 bedroom living quarters for teachers in CSS Abalamabie		
<b>Health</b>					
	<b>Base</b>	TSKJ-EPC	Sponsorship of Bonny Local Gov. Immunisation Programme	Completed 1999	
	<b>Expansion</b>	TSKJ-EPC	Water haulage to Community	Completed 2002	
<b>Social / Environmental</b>					



S/No.	NLNG Project phase	Sponsor	Project name / scope	Status	Comment
	<b>Base</b>	TSKJ-EPC	Construction of gangway and passenger jetty at Bonny waterside Port Harcourt	Completed 1999	
	<b>Base</b>	TSKJ-EPC	Donation of 2 No. 504 Saloon cars to Bonny Chiefs' Council	Completed 1997	
	<b>Base</b>	TSKJ-EPC	Supply of 350KVA generating set	Completed 1997	
	<b>Base</b>	TSKJ-EPC	Road maintenance Bonny	Completed 1999	
	<b>Base</b>	TSKJ-EPC	Supply of 500 life jackets for marine safety	Completed 1998	
	<b>Base</b>	TSKJ-EPC	Provision of boat for marine Police	Completed 1998	
	<b>Base</b>	TSKJ-EPC	Renovation and furnishing of Integrated Recruitment Centre Bonny	Completed 1999	
	<b>Base</b>	TSKJ-EPC	Construction of Bus Stops and Speed breakers Bonny	Completed 1999	
	<b>Base</b>	TSKJ-EPC	Publication on Health, Safety and Environment as Public Enlightenment in Ibani Herald	Completed 1999	
	<b>Expansion</b>	TSKJ-EPC	Park road (Bonny)	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC	Repair and up-grade of King Jaja/New road (Bonny)	Completed 2000	
	<b>Expansion</b>	TSKJ-EPC	Court road extension/repair (Bonny)	Completed	
	<b>Expansion</b>	TSKJ-EPC	Coal beach up-grade (Bonny)	Completed	
	<b>Expansion</b>	TSKJ-EPC	Ogwede road construction (Bonny)	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC	Stabilization of Allison/Ikuba square (Bonny)	Completed 2000	
	<b>Expansion</b>	TSKJ-EPC	Repairs to mission/king Perekule road (Bonny)	Completed 2000	
	<b>Expansion</b>	TSKJ-EPC	Supply of 200,000 tons of filling sand to Community	Completed 2002	
	<b>Expansion</b>	TSKJ-EPC	Construction and furnishing of 1,000 Seater Capacity Ibanise Hall	Completed 2003	
	<b>Expansion</b>	TSKJ-EPC	Furnishing of new Bonny LGA Secretariat	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC	Construction of Manilla Pepple drive	Completed 2001	
	<b>Expansion</b>	TSKJ-EPC	Road maintenance of Bonny Roads	Completed 2002	
	<b>Expansion</b>	TSKJ-EPC, Fuogerolle	Supply of building materials to Bonny LGA	Completed 2003	
	<b>Expansion</b>	TSKJ-EPC	Construction of drainage crossovers Finima	Completed 2000	
	<b>Expansion</b>	TSKJ-EPC	Construction of speed breakers (New Finima)	Completed 2001	
	<b>Expansion</b>	DAEWOO-EPC, Fuogerolle	Construction of Bonny Youth Federation auditorium	Completed 2003	
	<b>Expansion</b>	DAEWOO-EPC	Construction of indoor games building Finima	Completed 2001	



S/No.	NLNG Project phase	Sponsor	Project name / scope	Status	Comment
	<b>Expansion</b>	DAEWOO-EPC	Renovation and maintenance of GGSS Finima home economics/laboratory building	Completed 2002	
	<b>Expansion</b>	CIMIMUNTUBI	Renovation of laboratory block for GGSS Finima	Completed 2002	
	<b>Plus</b>	TSKJ-EPC	Construction of new road network for Bonny new town	Completed	
	<b>Plus</b>	TSKJ-EPC	Construction of BKDC secretariat complex	Completed 2005	
	<b>Plus</b>	TSKJ-EPC	Translation of the Bible to Ibani language	Completed	
	<b>Plus</b>	CIMIMUNTUBI	Building of Mono pump at Light House	Completed 2003	
	<b>Plus</b>	Fuogerolle	Complete concrete stabilization of FYC auditorium	Completed 2005	
	<b>Six</b>	TSKJ-EPC	Macualay road construction	Ongoing, about 35% completed	
	<b>Six</b>	TSKJ-EPC	Tuotamuno road construction	Completed	
	<b>Six</b>	TSKJ-EPC	Akiama-Ogwede road extension	Ongoing, about 95% completed	
	<b>Six</b>	TSKJ-EPC	Finima ditch clearing for areas A, B and C	Ongoing	
	<b>Six</b>	TSKJ-EPC	Finima grass cutting	Ongoing	
	<b>Six</b>	TSKJ-EPC	Bonny grass cutting	Ongoing	
	<b>Six</b>	Fuogerolle	Provision of 5 jumbo cement bags for Hon Reggie Wilcox burial	Completed	
	<b>Six</b>	Fuogerolle	Roofing of Chairman Bonny Chiefs council's house	Completed	
	<b>Six</b>	Fuogerolle	Renovation of Chairman BKEB's house	Completed	
	<b>Six</b>	TSKJ-EPC	Finima ditch clearing for areas A, B and C	Ongoing	
<b>Economic Empowerment</b>					
	<b>Expansion</b>	Fuogerolle	Payment of yearly youth dev. Levy Bonny	Completed 2003	
	<b>Expansion</b>	Fuogerolle	Payment of yearly youth dev. Levy New Finima	Completed 2003	

Table 9.3. Community social investment projects and programmes by NLNG (sub)contractors.

## 9.6 Quality of the stakeholder engagement process

### 9.6.1 Operationalisation of the SIMP

While assessing the stakeholder engagement process for **SevenPlus**, an important consideration is whether NLNG followed its own policies as stated in the SIMP. The SIMP listed the names of the stakeholder groups identified as critical stakeholders, high awareness stakeholders, and interest group stakeholders. In addition to mapping stakeholder groups, the SIMP specifies the engagement activities to be conducted with each stakeholder group during the EIA process. Critical stakeholders were to be invited to the scoping workshop in August 2005 and to other follow-on meetings to discuss project risks and mitigation options. High awareness stakeholders were to



receive an information letter apprising them of the meeting. They would also be informed about the public hearing in 2007.

A review of the participant records for the scoping workshop indicates that representatives from 13 of the 27 critical stakeholder groups attended the meeting. Four high awareness stakeholder groups were also in attendance, including one labour union. Absent among the critical stakeholders were various community representatives (e.g. the Bonny Boat Operating Union, the Bonny Kingdom Employment Bureau, and chiefs of THE SETTLEMENT) and representatives from other industries operating on Bonny Island, notably Exxon-Mobil. As the **SevenPlus** Project will be managing risks associated with increased shipping traffic and noise and air thresholds with the potential to impact THE SETTLEMENT, Bonny, and Finima communities, in retrospect, the EIA process failed to include what turned out to be several of the Project's most important "critical" community stakeholders. All above mentioned examples except the Bonny Boat operating Union had been invited to the meeting. Issues related to the cumulative impacts of all industries operating on the Island turned out to be one of the most important stakeholder concerns for the **SevenPlus** Project. Had ExxonMobil and other industry representatives been present at the scoping workshop they may have been able to inform NLNG of their planned activities which became known to NLNG only late in the EIA process. While NLNG may not have been able to anticipate the necessity to have these stakeholder groups at the scoping workshop, the workshop minutes, other information leaflets, and active engagement methods could have been utilised to inform these groups and others not in attendance.

Deviations from the schedule of engagement activities indicated in the SIMP occurred early in the EIA consultation process, at the time of the kick-off baseline studies in January 2006. As mentioned above, the kick-off presentation of the baseline studies to the Kingdom of Bonny, BECC and the Chiefs Council did not result in sufficient input from the stakeholders because they did not have access to the Terms of Reference in advance of the meeting. Plans to discuss the draft ESHA report and hazards and impacts in September 2006 did not occur because the stakeholders wanted clarification on previous commitments before proceeding, and was subsequently postponed until June 2007.

In the future, close alignment with the *Community Relations Stakeholders Engagement Plan* will ensure that the stakeholders will be continuously engaged throughout the life of the project. Modifications to the *Plan* allowing for the clarification of emerging issues will also ensure that communication channels do not break down during periods of tension and that productive working relationships can be maintained. Efforts to improve the quality, planning, and reporting of NLNG's community relations should be a priority for **SevenPlus**.

#### 9.6.2 Compliance with national and international standards

In April-May 2007 NLNG conducted a brief review to determine whether the stakeholder engagement process conducted for the **SevenPlus** Project met national and international standards, to identify any critical stakeholders who were left out of the process, and to make improvements for the future. As noted above, the SIMP is a live document that needs regular updating to accurately reflect the universe of stakeholders relevant to the **SevenPlus** Project and their main interest areas and to maintain a current schedule of consultations and information strategies with critical stakeholders, high awareness stakeholders, and interest group stakeholders. This assessment is part of this process.

The main piece of Nigerian legislation stipulating stakeholder input into the EIA process is EIA Decree, No. 86 (Ref. 9.6). Therein it is briefly stated that stakeholders will have "a say" in the development of environmental projects. The regulatory framework for identifying the stakeholders and involving them in the decision making process is not specified in the Decree. As such, the Decree is less stringent than international standards, specifically, the IFC Performance Standards which were adopted in 2006. Performance Standard 1 on Social and Environmental Assessment and Management Systems and its accompanying guidance note provides a framework for consultation much more rigorous in definition and scope than Nigerian national legislation. The framework is grouped under four broad principles: stakeholder identification and mapping,



community engagement, consultation and information disclosure. These principles and their tenets are summarised in Table 9.4 below.

<b>Standard</b>	<b>Indicator</b>	<b>Compliant</b> = √	<b>Notes</b>
<b>Nigerian legislation*:</b>			
Consultation	Stakeholders will have input into proposed activity	√	Demonstrated through stakeholder engagement matrix Demonstrated through formal EIA approval and associated public hearing
Participation	<i>"Any person or community to be affected directly or remotely shall be notified and there shall be 'consultations' which in effect means that the person or community shall have a say in the final decision of FEPA."</i>	√	Demonstrated through stakeholder engagement matrix Demonstrated through formal EIA approval and associated public hearing
<b>International standards**:</b>			
Stakeholder Identification & Mapping	Identification of stakeholder groups, critical stakeholders and map zones of impact	√	Documented for the Project in the <i>Stakeholder Identification and Management Plan (SIMP)</i> presented in Appendix 18. Details to be translated into NLNG's <i>Community Relations Stakeholder Engagement Plan</i> .
Community engagement	<i>"Nature and frequency of community engagement will reflect the project's risks to and adverse impacts of the affected communities."</i>	√	Efforts by NLNG to inform communities of project impacts were not always successful (see October 12, 2006 meeting above) because BKDC/BECC/FDC boycotted the consultation process in order to reach agreement with NLNG on status of previous commitments. BKDC/BECC/FDC reviewed and gave feedback on draft impact tables and mitigation measures at a late stage in the project (June 2007).
	<i>"...will be free of external manipulation, interference, or coercion, and intimidation"</i>	√	Minutes of meetings were taken and circulated to and agreed with stakeholders. No complaints were made with respect to the transparency and authenticity of the engagement process.
	<i>"...conducted on the basis of timely, relevant, understandable and accessible information"</i>	√	There was one instance in which NLNG failed to provide communities with information prior to the June 5, 2006 meeting.
	Engagement will be ongoing throughout life of the project	NA	Implementation of ESHMP and through ongoing engagement activities led by NLNG's Sustainable Development Coordination Committee (SDCC).
Consultation	<b>Inclusive and culturally appropriate</b>		A wide and diverse set of stakeholders were consulted including NGOs, conservationists, women's groups, youth groups; however consultations with residents of THE SETTLEMENT were limited to baseline field work studies. Their desire to receive project benefits has not been acknowledged by NLNG who felt that active engagement with THE SETTLEMENT could be interpreted as giving legal status to THE SETTLEMENT and subsequently exacerbate tensions with New Finima/Bonny residents.
	Free, prior and informed consultation	√	Informed participation involving iterative consultation leading to incorporation of views into the decision-making process was weighed down by confusion and non-alignment over NLNG's previous commitments to the communities. More community feedback on their views of recent social investments could have been solicited to increase the efficiency and efficacy of NLNG-sponsored programs.
	Consultation leads to broad community support	√	Findings from the 2006 Social Performance Review (Ref. 9.4) indicates community satisfaction with NLNG to date, however there is no evidence from EIA consultations to suggest enthusiastic support.
Information disclosure	<i>"...client will provide communities with access to information on the purpose,</i>	√	Efforts by NLNG to inform communities of project impacts were not always successful (see October 12, 2006 meeting above) because BKDC/BECC/FDC



<i>Standard</i>	<i>Indicator</i>	<i>Compliant</i> = $\checkmark$	<i>Notes</i>
	nature and scale of the project, the duration of proposed project activities, and any risks to and potential impacts on such communities*		boycotted the consultation process in order to reach agreement with NLNG on status of previous commitments. BKDC/BECC/FDC reviewed and gave feedback on draft impact tables and mitigation measures at a late stage in the project (June 2007). Other informational tools, such as leaflets and the website could have been better employed for stakeholder engagement as they were available on a selective basis.
	Acceptable and understandable to various segments of the affected communities	$\checkmark$	Understanding of issues by community reps and members demonstrated by diverse and material feedback. Project would have benefited by consultations carried out in the communities, in addition to those conducted for the baseline field work. .
	Will be provided throughout life of the project	NA	Implementation of SIMP through existing management systems.

\*As per EIA Decree No. 86 (1992).

\*\*As per the IFC's Performance Standard 1 on Social and Environmental Assessment and Management Systems, April 30, 2006.

NA = Not Applicable

Table 9.4. Summary table assessing quality of stakeholder engagement per national and international specifications

The assessment found that the stakeholder engagement process undertaken for the ESHA process for the **SevenPlus** Project met all but one international standard (see indicator marked in bold in Table 9.4). NLNG adequately informed the Project's stakeholders about the project risks and proposed mitigation measures to lower these risks. BKDC/BECC and FDC were the most highly involved stakeholders in the consideration of issues and alternatives. NLNG also addressed concerns expressed at the August 2005 scoping workshop in the ESHA.

There are three areas where the stakeholder process could have been improved. First, the legacy of unfulfilled commitments diverted the focus from the ESHA and delayed the exchange of views and information regarding project impacts and mitigation far into the project. Opportunities for timely and meaningful participation were consequently missed and the scope of consultation was also limited, especially with regard to residents' opinions about the efficacy and efficiency of NLNG supported community programs. The main issue regarding these programs was the timing of these programs rather than their quality. According to the Performance Standard, free, prior, and informed consultation should lead to broad community support for the project (Ref. 9.3). While the scoping workshop resulted in the outward expression of views from a multitude of diverse stakeholders and an overall positive reception toward NLNG, it alone is not sufficient to conclude broad community support. Broad community support is contingent on continuous community consultations, which did not occur in this stakeholder process. NLNG needs to conclude its discussions with BKDC/BECC and FDC on the issue of unfulfilled commitments and take appropriate action to align expectations and keep agreements.

The second area for improvement concerns the status of THE SETTLEMENT and the other transient villages located in close proximity to the NLNG site. Residents of THE SETTLEMENT and their representatives were included in the baseline social and health studies, but were neither invited to the scoping workshop nor to other key consultation meetings with NLNG management. NLNG deems it culturally inappropriate to include the community of THE SETTLEMENT as a formal stakeholder group. This is incongruent with IFC Performance Standard 5 on Land Take and Involuntary Resettlement, which gives squatters the same rights as formal property owners (Ref. 9.3). With respect to stakeholder engagement, this means that transient communities should be actively engaged in project decisions on issues that affect them. For NLNG to be compliant with international standards, it needs to acknowledge representatives of THE SETTLEMENT as critical stakeholders and solicit their participation in the project. This should be made clear in the SIMP.

The third area of improvement concerns future planning of stakeholder involvement. Planned regular consultations on project risks, mitigations, and opportunities need to be incorporated into



the *Community Relations Stakeholders Engagement Plan* and routinely monitored as part of the project's stakeholder engagement process. By operationalising the SIMP, NLNG will become compliant on the issue of "stakeholder engagement throughout the life of the project." This issue is elaborated upon below.

## 9.7 References

- 9.1 Shell Global Solutions (2005), Nigeria LNG Train 7+ Project, Stakeholder Identification and Management Plan, Revision 0.3 - Draft. GS.05.50802.
- 9.2 Mac Ilwain, Colin (2007), AIDS on the Brink, *Nature*, Vol. 445, Issue 7124. January 11. See also: <http://www.businessfightsaids.org/site/apps/nl/content2.asp?c=gwKXJfNVJtF&b=1321353&ct=3439285>
- 9.3 International Finance Corporation – IFC (2006), IFC's Performance Standards on Social and Environmental Sustainability, April 20. See also: <http://www.ifc.org/ifcext/enviro.nsf/Content/PerformanceStandards> for the standards and <http://www.ifc.org/ifcext/enviro.nsf/Content/GuidanceNotes> for the guidance notes accompanying the standards.
- 9.4 Shell International B.V. (2006), Social Performance Review for Nigeria Ltd, Confidential Report, November.
- 9.5 NN (2002), Bonny Master Plan, N0114-RPT-PM-05, Rev. 3, 1 December.
- 9.6 Anago and Ifeanyi (2002), Environmental Impact Assessment as a Tool for Sustainable Development: The Nigerian Experience. International Congress, 19-26 April, Washington, D.C., pp. 8-9.
- 9.7 NN (1998), Memorandum of Understanding between the Bonny Kingdom and the Bonny Joint Industry Companies November.
- 9.8 BECC & Unic Concepts Ltd (2008), Environmental Impact Assessment (EIA) for the NLNG Sand Mining / Dredging Project for Site Preparation and Hydraulic Fill for the *SevenPlus* Development Project at Bonny, Final Report, February.