



# UWEMA (PARAMOUNT RULER) AMINIGBOKO PALACE

**AMINIGBOKO COMMUNITY  
EMUGHAN DISTRICT  
ABUA/ODUAL L.G.A  
RIVERS STATE**

C/o The Secretary to The Palace  
Ipah Royal House,  
Akiro Family  
Aminigboko, Abua  
Tel: 08056050981  
Email:

[uwemaaminigbokopalace@yahoo.com](mailto:uwemaaminigbokopalace@yahoo.com)  
[uwemaaminigbokopalace@gmail.com](mailto:uwemaaminigbokopalace@gmail.com)

Our Ref: UAP/ACA/05/MAY2019.....

Your Ref:.....

Date: 16th May, 2019.....

## SPECIFIC INSTANCE OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES

**Failure of The Shell Petroleum Development Company of Nigeria Limited to Obey International Best Practices & The OECD Guidelines While Instigating a Crisis in the Aminigboko Community of Abua/Odual Local Government Area of Rivers State, Nigeria Due to Shell's Enwhe Field Development Project – Gbaran Phase 3.**

**Appeal for Urgent Intervention & Mediation in Order to Ensure Proper Policy Implementation and to Avert Further Breakdown of Law and Order.**

**Presented to:**

The Dutch National Contact Point Secretariat  
National Contact Point (NCP) OECD – Guidelines for Multinational Enterprises  
Ministry of Foreign Affairs  
Directorate General of Foreign Economic Affairs (IMH)  
Rijnstraat 8  
2515 XP The Hague  
The Netherlands

**Concerning:**

The Shell Petroleum Development Company of Nigeria Limited (SPDC)  
Shell Industrial Area,  
Rumuobiokani,  
P.O. Box 263,  
Port Harcourt,  
Rivers State  
Nigeria  
Tel: +234(0)807  
Email: [shellNigeria@shell.com](mailto:shellNigeria@shell.com)  
Website: <http://www.shell.com.ng/about-us/what-do/spdc.html>

Shell Headquarters  
Carel van Bylandtlaan 16  
2596 HR The Hague  
The Netherlands  
Post: P.O. Box 162,2501 AN  
Tel: +31 703779111  
Website: <http://www.shell.com/>

**Submitted by:**

**Chief Olephiri Franklin Igoma (JP)**  
*Uwema (Paramount Traditional Ruler),*  
Aminigboko Community,  
Emughan Clan,  
Abua/Odual Local Government Area,  
Rivers State,  
Nigeria

And Aminigboko Council of Chiefs and Elders & Community Development Committee

Forward all correspondence through the office of:  
The Secretary to The Palace of Uwema Aminigboko Community  
Tel: +234(80)56050981  
Email: [uwemaaminigbokopalace@yahoo.com](mailto:uwemaaminigbokopalace@yahoo.com), [uwemaaminigbokopalace@gmail.com](mailto:uwemaaminigbokopalace@gmail.com)

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**Chief Olephiri Franklin Igoma (JP)**  
Uwema Aminigboko Community-Abua  
08073456996

**Chief Promise Sunday Igoma (JP)**  
Oola-Eghun Akiro

Oola-Eghun Ukwo

**Chief Godpower Akari**  
Oola-Eghun Ogbolo

**Chief M.B. Osila**  
Oola-Eghun Atian



### **Summary of the Specific Instance:**

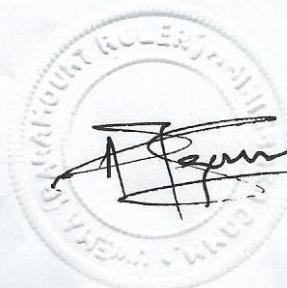
The Uwema (Paramount Traditional Ruler) Aminigboko Community, Council of Chiefs and Elders and Community Development Committee in Aminigboko Community, Emughan Clan in Abua/Odual Local Government Area of Rivers State, Nigeria files this specific instance against The Shell Petroleum Development Company of Nigeria Limited (SPDC). We believe Shell has breached the OECD Guidelines for Multinational Enterprises in their operations in the Enwhe Field Development Project – Gbaran Phase 3 of OML 22. This project is located in Aminigboko Community, Emughan Clan, Abua/Odual Local Government Area of Rivers State, Nigeria. As a result, this project has negatively impacted our peaceful co-existence, cultural and traditional systems, our human rights, community existing interface structure, and our fundamental labour rights.

Specific violations by The Shell Petroleum Development Company of Nigeria Limited (SPDC) include:

- Declining to disclose to the public the Project's Environmental Impact Assessment Final Report, including information on the project's risk management plans.
- Non-implementation of the Freedom to Operate (FTO) agreement
- Declining to approve a community recommended Community Liaison Officer (CLO) for the Enwhe Field Development Project – Gbaran Phase 3 rather SPDC appointed and imposed representatives onto the Aminigboko Community
- Declining to approve Rivers State government interface representative; while establishing parallel leadership structures
- Declining to provide social/sustainable intervention following devastating oil pollution in 2010 by provision of portable drinking water & reopening of the Aminigboko Cottage Hospital, built by SPDC in Aminigboko Community, which has remain closed since 2013.
- SPDC's forceful entry into our land with military protection without engagement and/or consent
- Refusal of SPDC Community Relations to grant audience request for community engagement and attend to our plights, and failure of its correspondence platform: email: [spdcommunitycontact@shell.com](mailto:spdcommunitycontact@shell.com) to attend to the myriad of our complaints in respect of SPDC Enwhe Field Development Project – Gbaran Phase 3 et al in Aminigboko Community.

The complaints listed above cover the period of October 2017 until present, apart from the devastating oil spill that occurred in 2010, which also demands comprehensive remediation. We request that the Dutch NCP offer its good office's and services to facilitate dialogue and help resolve the ongoing crisis in the Aminigboko Community caused by SPDC. SPDC Community Contact has ignored all of our couriered letters / emails via [spdcommunitycontact@shell.com](mailto:spdcommunitycontact@shell.com), which leaves us out of other options.

- ***SPDC Violations of the OECD Guidelines Chapter I, II, III, IV, V, VI, VII, VIII.***





### **About SPDC and SHELL:**

According to Shell's website, SPDC is the largest private-sector oil and gas company in Nigeria. It is the operator of a joint venture between the government-owned Nigerian National Petroleum Corporation – NNPC (55%), Shell (30%), Elf Petroleum Nigeria Limited – a subsidiary of Total (10%), and Agip (5%).

The Shell Company produced Nigeria's first commercial oil export in 1958 and it is focused on onshore and shallow water oil and gas production in the Niger Delta.

The global headquarters of the Shell Company, which owns 30% of SPDC, are located in The Hague, The Netherlands.

### **Detailed Complaint and Breaches of the OECD Guidelines:**

SPDC's Community Interface Co-ordinator and other relevant departments have been interacting with the Aminigboko Community leadership for decades until the commencement of the Enwhe Field Development Project – Gbaran Phase 3 in October, 2017 (preliminary job – road construction). At this time, SPDC stopped interacting with the Aminigboko Community leadership and instead carried out the following activities:

- (1) SPDC Major Project / Government Relation / Community Interface Teams in October, 2017 set up a parallel leadership structure for the interaction regarding the Enwhe Field Development Project – Gbaran Phase 3, and imposed this new parallel leadership structure on the community, setting aside the incumbent, existing leadership, age-old traditional, cultural/administrative and governance structures of Aminigboko Community. ***This is in violation of OECD Guideline Chapter II paragraph A.1, A.2, A.6, A.7, A.10, A.11, A.14, A.15.***
- (2) SPDC Major Project / Government Relation / Community Interface Teams have used their own parallel leadership structure that it appointed to illegally secure consent (Freedom to Operate FTO / License To Operate LTO / Community Trust and Support CTS) for the Enwhe Field Development Project – Gbaran Phase 3 in Aminigboko Community. ***It is also in violation of the OECD Guideline Chapter II paragraph A.14 and A.15.***
- (3) SPDC Major Project / Government Relation / Community Interface Teams against early notice illegally secured Freedom to Operate (FTO) for Arc Marine Construction Limited (Road Contracting company to SPDC) for 5.5km road construction in Aminigboko Community; Access Road to their proposed and existing project site, which was cancelled later by SPDC Management, following protest letter from the Chief/Head of Ogbolo Family. ***This is in violation to OECD Guideline Chapter I paragraph 3, 4, Chapter II paragraph A.1, A.2, A.5, A.6, A.7, A.13, Chapter III paragraph 1, Chapter VI paragraph 3, Chapter VII paragraph 1, 5.***
- (4) The Chief/Head of the Ogbolo Family protested the illegal FTO via a letter to The Managing Director of SPDC. The Chief said the illegally signed FTO was





cancelled and this was recognized by the authorized signatory – Chief/Head of Ogbolo Family, Aminigboko Community. Currently all agreements following FTO signing are considered breached; Arc Marine Construction Limited has not complied with FTO agreement reached and Shell Major Project has not enforced compliance till date. Arc Marine/SPDC non-compliance is instigating crisis, **this is in violation of OECD Guideline Chapter II paragraph A.14 and A.15**. The under-listed conditions were agreed on the FTO, but were not implemented till date, **this is in violation of OECD Guideline Chapter I paragraph 4**. This resulted in the following:

- No courtesy visit to Chief/Head of Ogbolo Family;
- No Contractor Entry / Introduction till date;
- Decline to pay salaries of 8 workers (1 CLO and 7 workers) for 1 year (12 months, from April 2018 – April 2019);
- Decline to provide Water Borehole / Water tank at the Palace of Chief/Head of Ogbolo Family as groundwater remains negatively affected by the 2010 devastating oil pollution in Aminigboko Community;
- Decline to renovate the Palace of Chief/Head of Ogbolo Family, as part of its corporate social responsibility as originally agreed;
- Arc Marine Construction Limited has yet to engage 60% of the area's semi-skilled community workers for the road construction till date as originally agreed;
- Arc Marine Construction Limited has declined to engage an indigenous contractor for local content contracts. All local content contracts are instead traded to third parties;
- Arc Marine Construction Limited declined to Acquire Construction Site for 1 (One) year of its operations of 5.5km road construction. As all Earth Moving machines and work equipments are parked along the road side.

***This is in violation of OECD Guideline Chapter II paragraph A.1, A.3, A.6, A.7, A.12, Chapter V paragraph 1e, 5, Chapter VI paragraph 2a.b, 3, Chapter III paragraph 1.***

- (5) SPDC's Major Project / Community Interface during their visit in October, 2017 appointed a "Chief Security Officer" of Aminigboko Community. This is a position/title alien to the leadership structure of Aminigboko Community, which led to sporadic gunshots from an opposing youth group. This matter was formally reported to SPDC's Managing Director and Security Agencies. The appointment by SPDC is counter-productive, as the community is now polarized. SPDC's actions have caused significant frustration, which has also led to an illegal arms build-up in the community. ***This is also in violation of OECD Guideline Chapter I paragraph 1, 2, 3, Chapter II paragraph A.6, A.11, A.15, Chapter III paragraph 1.***
- (6) SPDC's GMoU Maturation / Government Relation / Community Interface appointed and imposed a Chairman for the Abua/Odual Cluster Development



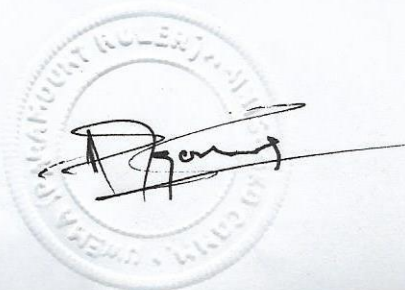


Board, setting aside Aminigboko Community leadership Community Trust list submitted to SPDC.

- SPDC's imposed nominee is not a nominee of the landlord family Chiefs/Heads, nor is he a nominee of the landlord family of the Aminigboko Community Trust list.
- This is a violation of the exclusive rights of the Aminigboko Community landowners families, despite letters from the Aminigboko Community leadership to The Managing Director of SPDC, stating that they were against any alteration or substitution of Aminigboko Community Trust list.

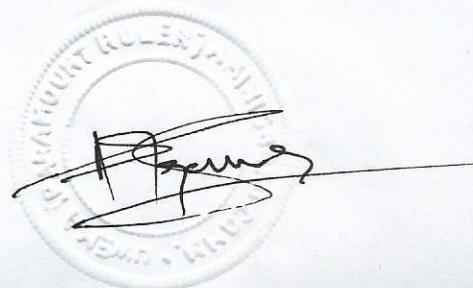
***This is in violation of OECD Guideline Chapter II paragraph 1, Chapter I paragraph A.15, Chapter IV paragraph 1, 2, 3, 4, 5.***

- (7) SPDC Major Project / Community Interface Teams have facilitated the signing of Freedom To Operate (FTO) by strangers and unknown persons, without the consent of Chief/Head of Akiro and Ogbolo Families of the Aminigboko Community, using heavy security for protection to have unrestricted access to our land for Morpol Engineering Services Limited / Mife Construction Limited (SPDC Contracting firms), for re-surveying, road construction and site preparation. ***This is in violation of OECD Guideline Chapter II paragraph A.14, A.15, Chapter IV paragraph 1, 3, 4 and Chapter VIII paragraph 7.***
- (8) In a related development, SPDC Contracting firm Daewoo E & C DN-65, Daewoo Nigeria Limited forcefully entered into Akiro family land in the Aminigboko Community, while carrying out bush clearing and destruction of properties, desecrating our land, all without the consent/consultation/approval of the Chief/Head of Akiro Family. ***It is in violation of OECD Guideline Chapter II paragraph A.14, A.15, Chapter IV paragraph 1, 3, 4.***
- (9) SPDC has stopped the delivery of our Christmas Gift for 2018, and 2019 Secondary School Scholarship cradle to career Forms, corporate social responsibility and sustainable development programme, amidst the formal protests of the Aminigboko Community leadership in regards to SPDC's actions. ***It is in violation of OECD Guideline Chapter II paragraph A.1, A.2, A.4, Chapter IV paragraph 1, 2, 4.***
- (10) SPDC's Community Interface Co-ordinator has declined to grant audience and has declined to interact with the Aminigboko Community leadership, despite our many requests for meetings, since inception of current SPDC's Interface Co-ordinator. Hence there has been no meaningful and productive community engagement by SPDC with the Aminigboko Community. ***This is also in violation of OECD Guideline Chapter II paragraph A.2, A.7, A.14, Chapter IV paragraph 1, 4.***
- (11) SPDC have declined to engage with the Aminigboko Community for the provision of infrastructural development of our community, as contained in our EIA response / review report to SPDC.



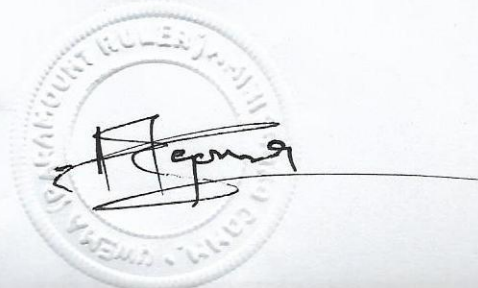


- (12) SPDC appointed "Chief Security Officer" – Aminigboko Community, against the leadership structure and norms of the Aminigboko Community, while invading the Ipah Royal House, in Akiro Family, Aminigboko Community with pump-action raffle and fired several shots. This incident was reported to Nigeria's Security Agencies. ***This is in violation of OECD Guideline Chapter II paragraph A.14, A.15.***
- (13) In a related development, SPDC's appointed/imposed Chairman, Abua/Odual Cluster Development Board, attacked members of the Aminigboko Community cabinet members in their private residence in Port Harcourt with armed men and vandalized properties, while threatening their lives. This incident was reported to The Managing Director of SPDC. ***It is also in violation of OECD Guideline Chapter II paragraph A.14, A.15 and Chapter IV paragraph 1, 4.***
- (14) In the same vein, a member of Aminigboko Community cabinet was attacked and had several machete cuts on his head and right thigh by the same SPDC appointed "Chief Security Officer" on issues regarding the access by SPDC Major Project without FTO into Akiro family land.  
***It is a violation of OECD Guideline Chapter II paragraph A.14, A.15.***
- (15) Aminigboko Community leadership have organized Local Security Network that have over the years collaborated with Government Security Agencies for Surveillance and prompt incident reportage and interface with SPDC for oil facilities protection and fighting against illegal oil bunkering / facility sabotage in the area. SPDC's Major Project and Community Interface has engaged third parties and faceless people to award Local Security Contract, an exclusive right of Aminigboko Community Leadership in the ongoing Arc Marine Construction Limited road project and Enwhe Field Development Project – Gbaran Phase 3, in Aminigboko Community. ***It is a violation of OECD Guideline Chapter II paragraph A.14, A.15.***
- (16) SPDC Contracting firm (Arc Marine Construction Limited) currently constructing 5.5km road in the Aminigboko Community have NO Worksite till date since inception of operations, hence Earth Moving machines and equipments are parked on the road side. ***This is in violation of OECD Guideline Chapter I paragraph 4, Chapter II paragraph A.4, A.13, A.16, Chapter VI paragraph 3, 6, 8.***
- (17) SPDC has yet to release the FINAL REPORT OF ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT for the Enwhe Field Development Project – Gbaran Phase 3, despite a formal request made to SPDC. ***It is in violation of OECD Guideline Chapter III paragraph 1, 2, 4, Chapter VI paragraph 3, 5 and 6.***
- (18) SPDC has yet to pay for its acquired land before commencement of the Enwhe Field Development Project – Gbaran Phase 3, in the Aminigboko Community. ***It is in violation of OECD Guideline Chapter IV paragraph 1, 3, Chapter II paragraph A.1, A.2, A.11, A.14.***





- (19) SPDC declined to approve, employ and train Welders, Fitters, Scaffolders, Riggers, Electrician, Earth Moving Machines Operators, etc, under the Employment and Training Scheme for engagement in the forthcoming Enwhe Field Development Project – Gbaran Phase 3, thereby refusing to develop capacity to enable community participation in the project execution phase and beyond, which also is in violation with the Nigeria Content Development Act 2010. ***This is also in violation of OECD Guideline Chapter II paragraph A.1, A.4, Chapter V paragraph 5.***
- (20) SPDC declined to engage with the Aminigboko Community Education and Employment Bureau to employ our indigenous people in (1) Managerial / Professional as SPDC Staff / Contract Staff / Skilled and Unskilled staffs in compensation for loss of Land Use.
- (21) SPDC's contracting firm MIFE Construction Nigeria Limited (Contracting company for SITE Preparation at Well 4 Enwhe East) had forcefully entered into Ogbolo Family land in the Aminigboko Community with heavy security protection and cleared the site without a Freedom to Operate (FTO) duly signed by the Chief/Head of Ogbolo Family. ***It is in violation of OECD Guideline Chapter II paragraph A.14 and A.15.***
- (22) SPDC declined to interface with Aminigboko Community leadership / Education and Employment Bureau / relevant Skill Associations in the area, for employment of indigenes for road construction in Aminigboko Community by SPDC contracting firm Arc Marine Construction Limited. ***It is in violation of OECD Guideline Chapter II paragraph A.1, A.4 and Chapter V paragraph 5.***
- (23) SPDC Major Project / Government Relations / Community Interface Co-ordinator teams involved in the Enwhe Field Development Project – Gbaran Phase 3 has deliberately created contentions, in order to cause disunity in the families of the Aminigboko Community, to enable the SPDC teams take undue advantage. ***This is in violation of the OECD Guideline Chapter II paragraph A.14. A.15.***
- (24) SPDC is yet to disclose to the Aminigboko Community the ground water status since the devastating oil pollution that occurred in 2010. ***It is in violation of the OECD Guideline Chapter III paragraph 1.***
- (25) Rather than engage and get the consent of the landowners by engaging with the Chief/Head of host families, SPDC has militarized its operations in the Enwhe Field Development Project – Gbaran Phase 3. ***It is in violation of OECD Guideline Chapter II paragraph A.2, A.11, Chapter IV paragraph 4, Chapter VI paragraph 2a.b.***
- (26) SPDC's Major Project / Government Relations / Community Interface Coordinator teams, by their actions and inaction, have polarized the Aminigboko Community, and lives of cabinet members of Aminigboko Community leadership and Legal Adviser are often threatened. Currently, there is arms buildup in the community, a recipe for crisis in Aminigboko Community. ***This is in violation of the OECD Guideline Chapter II paragraph A.14 and A.15.***





- (27) SPDC declined a nomination made by the Rivers State government for interface and representation on the Enwhe Field Development Project – Gbaran Phase 3.
- (28) SPDC mode of operations is far from International Best Practice.

#### **Past Effort to Resolve these Complaints:**

Aminigboko Community leadership have formally complained to SPDC Management. Complaint letters were dispatched by courier and via email: [spdccommunitycontact@shell.com](mailto:spdccommunitycontact@shell.com). SPDC did not respond with any formal engagement with the Aminigboko Community leadership to address our plight.

SPDC host families/landlords in the area carried out peaceful demonstration on Thursday 6<sup>th</sup> September, 2018 at the SHELL Industrial Area Gate after prior notice of SPDC illegal activities and SPDC's refusal to grant audience to engage with stakeholders.

Furthermore, the Aminigboko Community leadership also made a formal complaint on the failure of SPDC Community Feedback Mechanism to address the company's (SPDC) harmful practices, which have been instigating crisis in Aminigboko Community to:

- (1) The Director General, Department of State Service, Abuja, Nigeria (Acknowledged receipt on 25<sup>th</sup> October, 2018)
- (2) The Honourable Minister, Federal Ministry of Environment, Abuja, Nigeria. (Acknowledged receipt, but no response)
- (3) The National Human Right Commission, Abuja, Nigeria (Replied via letter dated 2<sup>nd</sup> January, 2019, reference number C/2018/ESCR/4737/HQ, and advised us to explore internal dispute resolution mechanism set out by the Rivers State Government).
- (4) Amnesty International, Abuja, Nigeria (Acknowledged receipt on 25<sup>th</sup> October, 2018, also replied via a letter dated 15<sup>th</sup> November, 2018, reference number AIN/0283/101/18)
- (5) The Commander, Operation Delta Safe, Yenagoa, Bayelsa State (Acknowledged receipt of letter on 29<sup>th</sup> October, 2018)
- (6) The Managing Director, SPDC Nigeria (Letter sent via email: [spdccommunitycontact@shell.com](mailto:spdccommunitycontact@shell.com) and courier, without response).

SPDC Community Feedback Mechanism has failed to address issues highlighted above till date.

#### **Landowners Institute Legal Suits Against SPDC**

In the absence of any engagement by SPDC to address our plight, landowners have resorted to legal suits against SPDC that bothers on Freedom to Operate (FTO) engagement, negotiation, signing by authorized signatory, and the illegal constitution of SPDC Abua/Odual Cluster Development Board:

1. Chief Simon Maduko vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/166/2018 (*Maduko Family, Aminigboko*)





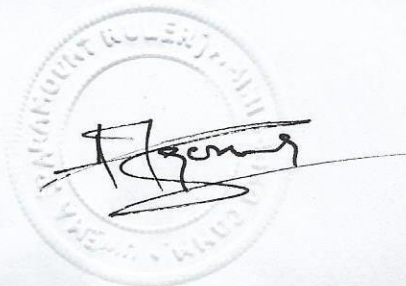
- Community suit against SPDC on Freedom to Operate / Community Trust Support consultation/negotiation before signing by the Chief/Head of the family)*
2. Chief Promise Sunday Igoma vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/168/2018 *(Akiro Family, Aminigboko Community suit against SPDC on Freedom to Operate / Community Trust Support consultation/negotiation before signing by Chief/Head of Akiro family - authorized signatory)*
  3. Chief Godpower Mark Akari vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/169/2018 *(Ogbolo Family, Aminigboko Community suit against SPDC on Freedom to Operate / Community Trust Support consultation/negotiation before signing by Chief/Head of Ogbolo family – authorized signatory)*
  4. Chief Promise Sunday Igoma & Ors vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/ /2018 *(Aminigboko Community Trust Nominees against SPDC on community list exclusion and imposition of illegal nominee by SPDC).*

#### **OUR REQUEST OF SPDC & SHELL:**

We are seeking the Dutch NCP to help us make the following urgent recommendations to SPDC and Shell:

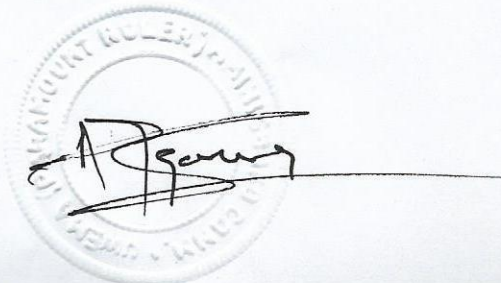
- 1) SPDC's Major Project / Government Relations / Community Interface Coordinator should maintain the status quo and interface with Aminigboko Community leadership / Chief/Head of host families and Community Development Committee members.
- 2) SPDC should terminate all parallel leadership structures and the appointment of Chief Security Officer in the Aminigboko Community
- 3) SPDC and her contracting firms operating in Aminigboko Community should stop all pseudo interface with parallel leadership structures.
- 4) SPDC should approve the audience requests of the Aminigboko Community leadership with stakeholders before commencement of the Enwhe Field Development Project – Gbaran Phase 3 in Aminigboko Community.
- 5) SPDC should obtain consent, engage, negotiate all benefits, and duly sign FTO, which are authorized by Chief/Head of host families before the company (SPDC) or its agent(s) enter any land to carry out any activity.

**Please Note:** The obtaining of the FTO/LTO from the landowner's family before carrying on any activity/job on the land is a right of the landowning family. This is because it is a recognition and affirmation that the landowning family that they are the owner of the affected land. A failure to obtain an FTO/LTO from the landowning family before entry into the land by SPDC or its agent(s) to carry out any activity/job amounts to a denial of the title or ownership of the family over the land and is a violation of the right of the landowning family.





- 6) SPDC Major Project should implement the correctly signed FTO agreement by the Chief/Head of Ogbolo family in regards to the Road construction handled by Arc Marine Construction (Contracting company to SPDC).
- 7) SPDC Major Project should direct Arc Marine Construction to acquire a Work Site as all equipments for the construction of 5.5km road are parked by the road side.
- 8) SPDC's Major Project / GMoU Maturation / Community Interface Co-ordinator should terminate the position of the purported Chairman, Abua/Odual Cluster Development Board, which it appointed and imposed on Aminigboko Community. He is not a nominee or representative of Aminigboko Community.
- 9) The Aminigboko Community Trust list submitted by the Aminigboko Community leadership are entitled to be constituted into the current SPDC GMoU Community Trust / Abua/Odual Cluster Development Board.
- 10) SPDC and Contracting firms (MIFE Construction Limited, Morpol Engineering Services Limited and Daewoo) to pay compensation for desecrating of land resulting from forceful entry into our land using heavy security protection and pay adequate compensation for the destruction of properties.
- 11) SPDC should deliver 2018 Christmas Gifts, 2019 Secondary School Scholarship Forms and Cradle to Career Scholarship.
- 12) SPDC to order and monitor her appointed Chief Security Officer and purported Chairman, Abua/Odual Cluster Development Board, and others to stop threatening the lives of members of the Aminigboko Community's leadership cabinet and Counsel.
- 13) SPDC and other relevant agencies should consider our concerns, identified deficiencies, inaccurate information, among others expressed in our response to EIA Advert / EIA Review submitted and the final report should be made public.
- 14) SPDC to change Oil Field Name from Enwhe Oil Field to Emughan Oil Field. The name 'Enwhe' does not relate to our language and culture in any way (Enwhe means monkey in Ibo Language) and is alien to our tribe. We urge SPDC (SHELL) to change the name of the Oil Field from 'Enwhe Oil Field' to 'Emughan Oil Field'.
- 15) SPDC should engage the Aminigboko Community's recommended Community Liaison Officer (CLO) for Enwhe Field Development Project – Gbaran Phase 3, for proper community and SPDC interaction.
- 16) SPDC should engage the Rivers State Government appointed representative for the ongoing SPDC Enwhe Field Development Project – Gbaran Phase 3. (Abua/Odual and Ahoada West Local Government Area of Rivers State) for effective government, SPDC and Community interface.
- 17) SPDC should award all Local Security Contracts to Aminigboko Community leadership for effective collaboration with Security Agencies and SPDC.

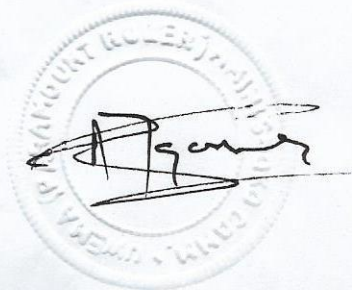




- 18) SPDC should pay for land/surface rights acquired for its operational activities/jobs.
- 19) SPDC is yet to carry out social interventions especially the provision of portable drinking water and reopening, rehabilitation and sustenance of Aminigboko Cottage Hospital before its commencement of the Enwhe Field Development Project – Gbaran Phase 3. Aminigboko Community ground water remains affected by the devastating oil pollution that occurred in 2010.
- 20) SPDC should carry out comprehensive remediation of the 2010 devastating oil pollution in Aminigboko Community till date.
- 21) SPDC should establish a Emughan Cluster Development Board for geographical, administrative and operational convenience.
- 22) SPDC should fully integrate Aminigboko Community stakeholders in Environmental Management planning, execution and monitoring.
- 23) SPDC to integrate Aminigboko Community leadership/rulership / Local Security in its security operations in the Aminigboko Community for synergy/collaboration to combat crimes for a peaceful and enabling environment for smooth operations of Enwhe Field Development Project – Gbaran Phase 3.
- 24) SPDC should pay the cost of square meter of land for oil operations according to international standards.
- 25) SPDC should properly spell out Scope of Work for full benefits of local content.
- 26) SPDC should carry out its operations in Aminigboko Community in compliance with International Best Practices.

**WE ARE SEEKING THE FOLLOWING FROM THE DUTCH NCP:**

- (1) The Rivers State Government in Nigeria has no non-judicial dispute mechanism in place, but rather deals with court cases, this option we deemed not appropriate given that non-judicial mechanisms, like the NCP specific instance process, is more suitable at the time being.
- (2) We request the NCP to offer its good offices to facilitate mediation between The Shell Petroleum Development Company of Nigeria Limited and the Aminigboko Community.
- (3) Given the tension and the human right breaches that Aminigboko Community is experiencing, we ask the NCP to carry out a fact-finding mission to verify our concerns expressed in this complaint.
- (4) We request the NCP to make an assessment of the facts and circumstances and determine whether the OECD Guidelines have been breached by SPDC.
- (5) We request the NCP to use its good offices and invite SHELL (SPDC) to engage in mediation with us in the Netherlands (or in Nigeria). As we have limited resources, we kindly request that the NCP also cover the costs associated with mediation.





On behalf of Aminigboko Community, Chief and Elders, and Community Development Committee, I submit this written complaint in good faith, against the activities of The Shell Petroleum Development Company of Nigeria Limited in regards to their Enwhe Field Development Project – Gbaran Phase 3 in Aminigboko Community. We kindly request the Dutch NCP's leadership's and support in order to provide assistance and help resolve this detailed complaint and breaches of the OECD Guidelines by The Shell Petroleum Development Company of Nigeria Limited in Aminigboko Community. We also urgently request to resolve this matter and that SPDC stops the incitement that threatens our lives on the ground.

Kindly acknowledge receipt of this complaint.

Thank you for consideration. Please find references attached in the Annexure.

Yours faithfully,



**Chief Olephiri Franklin Igoma (JP)**  
*Uwema (Paramount Traditional Ruler)*  
Aminigboko Community, Emughan Clan,  
Abua/Odual Local Government Area,  
Rivers State, Nigeria.

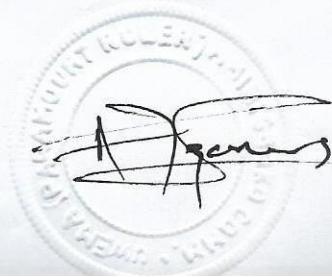
#### ANNEXURE:

##### 1. SPDC COMMUNITY ENGAGEMENT WITH AMINIGBOKO COMMUNITY LEADERSHIP PRIOR TO ENWHE PROJECT COMMENCEMENT

- (a) SPDC Environmental Impact Assessment (EIA) Scoping Workshop – 26<sup>th</sup> July, 2012; Appendix 1.
- (b) SPDC Environmental Impact Assessment (EIA) Scoping Workshop 26<sup>th</sup> July, 2012 – Newspaper Publication; Appendix 2.
- (c) SPDC JV Scoping Workshop on Enwhe FDP 11<sup>th</sup> August, 2016; Appendix 3.
- (d) SPDC JV Land Acquisition Sensitization on Enwhe Field Development Project – 10<sup>th</sup> November, 2016; Appendix 4.
- (e) SPDC Integrated Stakeholders Engagement – 22<sup>nd</sup> August, 2017; Appendix 5.
- (f) Aminigboko Community three-man delegation for SPDC Global Memorandum of Understanding (GMoU) for Abua/Odual Cluster Development Board communities conducted at SHELL Residential Area, Port Harcourt, Nigeria – 18<sup>th</sup> – 20<sup>th</sup> October, 2017; Appendix 6.
- (g) Submission of ten (10) man Aminigboko Community Trust list with gender compliance by Aminigboko Community leadership to SPDC; Appendix 7.
- (h) SPDC Global Memorandum of Understanding (GMoU) Agreement between Abua/Odual Cluster Communities cosigned by Aminigboko Community leadership; Appendix 8.

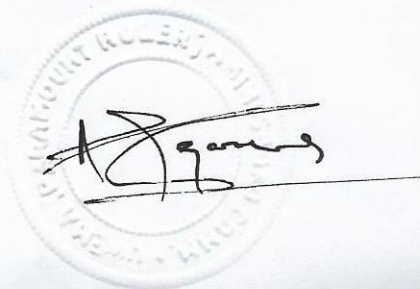


- 2. SPDC / FEDERAL MINISTRY OF ENVIRONMENT PUBLICATION (PUBLIC NOTICE) ON ENWHE FIELD DEVELOPMENT PROJECT**
- (a) Newspaper publication on Enwhe Field Development Project – Gbaran Phase 3 - The TIDE, April 12, 2017; Appendix 9.
  - (b) Environmental Impact Assessment (EIA) Report – Enwhe Field Development Project – Gbaran Phase 3. DRAFT COPY submitted to Federal Ministry of Environment, Abuja, March 2017; Appendix 10 (Scanned PDF).
  - (c) Aminigboko Community leadership/rulership response to EIA Draft Report on our concerns, identified deficiencies, inaccurate information, exclusions, among others, dated 9<sup>th</sup> May, 2017 reference number UAP/ACA/02/MAY2017 addressed to The Honourable Minister, Federal Ministry of Environment, copied The Managing Director, SPDC; Appendix 11.
  - (d) Aminigboko Community leadership/rulership reminder letters for the conduct of Environmental Impact Assessment (EIA) Review, addressed to The Honourable Minister, Ministry of Environment, Abuja, and The Environment Manager, SPDC, copied The Managing Director, SPDC, Appendix 12 and 12a.
  - (e) Federal Ministry of Environment & SPDC conducted Panel Review Meeting of the EIA of the proposed Enwhe Field Development Project - Gbaran Phase 3. Aminigboko Community leadership/rulership invitations; Programme of Events, Review Presentation, newspaper publication. Appendix 13, 13a, 13b, 13c, 13d, 13e.
  - (f) Aminigboko Community leadership/rulership demand for release of FINAL REPORT OF ENVIRONMENTAL IMPACT ASSESSMENT (EIA) REPORT FOR ENWHE FIELD DEVELOPMENT PROJECT – GBARAN PHASE 3, Prior to Commencement of Project, addressed to The Managing Director, SPDC; The Honourable Minister, Federal Ministry of Health; The Executive Secretary, Nigeria Content Development Monitoring Board; Appendix 14, 14a, 14b.
- 3. AMINIGBOKO COMMUNITY LEADERSHIP PUBLIC SENSITIZATION FOR PROTECTION OF SPDC FACILITIES**
- (a) Police Permission for Public Sensitization against illegal oil bunkering – 28<sup>th</sup> September, 2010; Appendix 15, 15a, 15b.
- 4. AMINIGBOKO COMMUNITY LEADERSHIP/RULERSHIP COLLABORATION WITH SECURITY AGENCIES FOR PROMOTION OF PEACEFUL ENVIRONMENT FOR SMOOTH OPERATION OF ENWHE FDP**
- (a) Letter to Divisional Police Officer, Abua/Odual Local Government Area, Rivers State; Appendix 16
  - (b) Letter to Area Commander, Ahoada, Rivers State; Appendix 17
  - (c) Letter to The Commissioner of Police, Rivers State Command; Appendix 18
  - (d) Letter to The Director, Department of State Service, Rivers State Command; Appendix 19
- 5. SUPPORTIVE ROLE OF AMINIGBOKO COMMUNITY LEADERSHIP/ RULERSHIP FOR SPDC OPERATIONS IN AMINIGBOKO COMMUNITY**
- (a) Combating illegal oil bunkering / sabotage, complimenting the effort of security agencies to protect SPDC facilities in Aminigboko Community leadership/rulership sponsored telecast on African Independent Television





- (AIT) Local/International on 28<sup>th</sup> September, 2010, as regards the devastating illegal oil bunkering in our community; Appendix 20 (video clip).
- (b) Prompt reportage of planned vandalization of Aminigboko Cottage Hospital to security agencies; Appendix 21, 21a
  - (c) Arrest and prosecution of Aminigboko Cottage Hospital vandals; Appendix 22
  - (d) Aminigboko Community leadership/rulership REFUTED letter to His Excellency, The Executive Governor of Rivers State, on false allegations by SPDC officials on killings and arson in Aminigboko Community; Appendix 23 and 23a
  - (e) Aminigboko Community leadership/rulership appeal for intervention of The Honourable Commissioner, Ministry of Chieftaincy and Community Affairs, Rivers State, on the interruptions during SPDC Land Acquisition Exercise in Aminigboko Community; Appendix 24
  - (f) Aminigboko Community leadership/rulership formal report of disruptions at the venue of EIA Public Review by Federal Ministry of Environment and SPDC on Enwhe FDP; Appendix 25.
- 6. REQUEST FOR SPDC TO BUILD SOLAR POWERED WATER TREATMENT PLANT IN AMINIGBOKO COMMUNITY**
- (a) Request for SPDC Social Intervention to address NO availability of Portable Drinking Water before the commencement of Enwhe Field Development Project – Gbaran Phase 3, by Aminigboko Community leadership/rulership; Appendix 26
- 7. REQUEST FOR SPDC TO REOPEN, RESUSCITATE AND SUSTAIN AMINIGBOKO COTTAGE HOSPITAL (BUILT AND DONATED BY SPDC)**
- (a) Aminigboko Community leadership/rulership request SPDC to reopen, resuscitate and sustain Aminigboko Cottage Hospital closed for 6 years now, before the commencement of Enwhe Project; Appendix 27.
- 8. DEMAND TO ESTABLISH SPDC EMUGHAN CLUSTER DEVELOPMENT BOARD**
- (a) Demand to unbundle SPDC Abua/Odual Cluster Development Board and Establish SPDC Emughan Cluster Development Board for geographical, administrative and SPDC operational convenience; Appendix 28 and 28a.
- 9. DEMAND FOR TRAINING OF FIVE HUNDRED INDIGENOUS YOUTHS FOR VARIOUS SKILLS UNDER THE EMPLOYMENT AND TRAINING SCHEME FOR ENGAGEMENT IN ENWHE FDP IN AMINIGBOKO COMMUNITY BEFORE PROJECT COMMENCEMENT**
- (a) Aminigboko Community leadership/rulership in conjunction with Education and Employment Bureau and relevant skill associations in the area demand for the employment and training of 500 youths for capacity building to enable community participation in the Enwhe Field Development Project execution phase and beyond; Appendix 29 and 29a.
- 10. AMINIGBOKO COMMUNITY LEADERSHIP/RULERSHIP STRUCTURE INTERFACING WITH SPDC OVER THE DECADES**

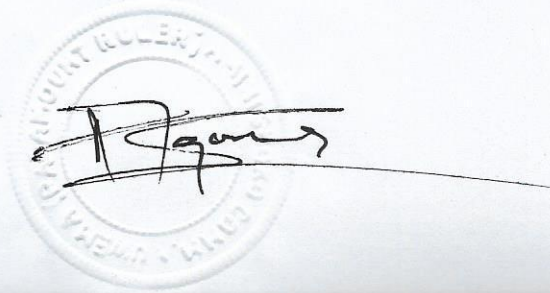




- (a) Aminigboko Community leadership/rulership have over the years interfaced with SPDC without encumbrance. Updated Aminigboko Community Cabinet members forwarded to SPDC as at when due; Appendix 30

**11. FAILURE OF SPDC TO OBEY INTERNATIONAL BEST PRACTICES, AND INSTIGATING CRISIS IN AMINIGBOKO COMMUNITY (RIPPLE EFFECTS OF PARALLEL LEADERSHIP / IMPOSITION BY SPDC IN AMINIGBOKO COMMUNITY EFFECTIVE OCTOBER, 2017)**

- (a) Protest from Aminigboko Community leadership/rulership against SPDC signing Freedom To Operate (FTO)/Community Trust Support (CTS) by unauthorized persons, to The Managing Director, SPDC; Appendix 31
- (b) Protest from Chief/Head of Ogbolo Family on illegal signing of FTO/CTS by SPDC Major Project team for Arc Marine Construction Limited for road construction in Aminigboko Community; Appendix 32
- (c) SPDC corrected copy and re-signed FTO/CTS for Arc Marine Construction Limited by authorized signatory; Appendix 33
- (d) SPDC Major Project, Government Relation and Community Interface Co-ordinator visit to Aminigboko Community on signed FTO/CTS illegally for Arc Marine Construction Limited and appointed "Chief Security Officer" followed by sporadic gunshots. Incident formally reported to The Managing Director, SPDC, by Aminigboko Community leadership/rulership; Appendix 34
- (e) Ripple effect of sporadic gunshots formally reported to The Managing Director, SPDC above and plan to incriminate cabinet members of Aminigboko Community leadership/rulership. Matter reported to The Director, Department of State Service, Rivers State Command; Appendix 35
- (f) Aminigboko Community and Ogbolo Family formally complained to The Managing Director of SPDC via Legal Counsel on non-compliance of terms agreed on FTO; appendix 36
- (g) Aminigboko Community leadership/rulership formal complaint on SPDC Government Relations (Otonye Davies letter) gross interference on leadership status quo of the community, addressed to The Managing Director, SPDC; Appendix 37
- (h) Aminigboko Community leadership/rulership formal complaint to The Managing Director, SPDC on negative activities of SPDC Major Project and Community Interface Co-ordinator; Appendix 38
- (i) Attack / Vandalization of the residence of cabinet members of Aminigboko Community leadership/rulership by SPDC appointed purported Chairman, Abua/Odual Cluster Development Board. Incident reported to The Managing Director, SPDC; Appendix 39
- (j) Attack on the Ipah Royal House, Akiro Family, Aminigboko Community, by SPDC appointed "Chief Security Officer". Incident reported to The Divisional Police Officer, Abua/Odual Divisional Headquarters, The Commissioner of Police, Rivers State Command, The Director, Department of State Service, Rivers State Command, and The Security Chief, DSS, ABOLGA; appendix 39, 39a, 39b, 39c



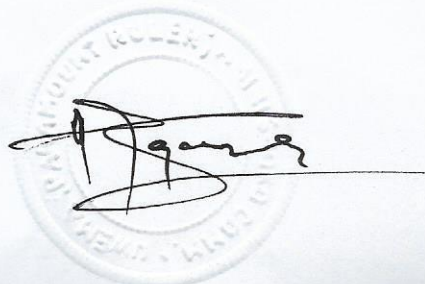


- (k) Denial of Local Contracts to indigenes of Aminigboko Community by SPDC Major Project and Community Interface Co-ordinator with respect to Arc Marine Construction Limited road construction in Aminigboko Community. Aminigboko Community leadership/rulership letters to The Managing Director, SPDC; Appendix 40
- (l) Denial of Aminigboko Community sustainable programmes / SPDC Christmas Gift for 2018 and 2019 respectively. Formal complaint of denial sent to SPDC; Appendix 41, 41a
- (m) SPDC Contracting company MIFE Construction Limited have forcefully entered Ogbolo family land (Access Road / Well 4) in Aminigboko Community without FTO/CTS or consent of Chief/Head of the family, commencing grading of access road and Well 4. Picture – Appendix 42
- (n) SPDC Contracting company Daewoo Nigeria Limited (details) entered Akiro Family land under heavy security without the consent for Chief/Head of the family, and bulldozed and destroyed properties/desecrate our land. The Legal Adviser of Daewoo communicated formally; Appendix 43, 43a, 43b
- (o) Morpol Engineering Services Limited (Contracting company to SPDC) forcefully entered Akiro and Ogbolo families under heavy security, without consent and FTO/CTS duly signed by authorized Chief/Head of the families, entered the lands of families and carried out re-surveying. The Managing Director, SPDC was communicated on the ill development; Appendix 44
- (p) In a related development the SPDC appointed “Chief Security Officer” attacked a member of Aminigboko Community cabinet on NO FTO/CTS related issue. Matter reported to The Divisional Police Officer, Abua/Odual, The Commissioner of Police, Rivers State Command, and The Director, Department of State Service, Rivers State Command; Appendix 45, 45a, 45b.
- (q) SPDC Contracting company Arc Marine Construction Limited currently constructing 5.5km road in Aminigboko Community for over one year have NO CONSTRUCTION SITE
- (r) SPDC Managing Director was duly communicated by Aminigboko Community leadership / rulership against any alteration or substitution of Aminigboko Community Trust list; Appendix 47. Against the community position, SPDC GMoU Maturation, Government Relations and Community Interface Co-ordinator went ahead to appoint and impose purported Chairman of SPDC Abua/Odual Cluster Development Board.

## **12. SPDC DECLINE AMINIGBOKO COMMUNITY ENGAGEMENT**

- (a) Aminigboko Community leadership have complained formally all issues of parallel leadership / imposition by SPDC to The Managing Director, SPDC. All correspondence also dispatched via email: [spdccommunitycontact@shell.com](mailto:spdccommunitycontact@shell.com). Proof of email; Appendix 47a-z

## **13. AMINIGBOKO COMMUNITY LEADERSHIP/RULERSHIP COMPLAINT ON FAILURE OF SPDC COMMUNITY FEEDBACK MECHANISM TO ADDRESS**





## ISSUES CAPABLE OF CAUSING BREACH OF THE PEACE TO RELEVANT AGENCIES

(1) In the absence of SPDC engagement, Aminigboko Community made formal report to relevant agencies:

- (a) The Director General, Department of State Service, Abuja, Nigeria
- (b) The Honourable Minister, Federal Ministry of Environment, Abuja, Nigeria.
- (c) The National Human Right Commission, Abuja, Nigeria  
(Replied via letter dated 2<sup>nd</sup> January, 2019, reference number C/2018/ESCR/4737/HQ, and advised us to explore internal dispute resolution mechanism set out by the Rivers State Government),
- (d) Amnesty International, Abuja, Nigeria
- (e) The Commander, Operation Delta Safe, Yenagoa, Bayelsa State
- (f) The Executive Secretary, Nigeria Content Development Monitoring Board, among others; Appendix 48, 48a, 48b.

## 14. PEACEFUL DEMONSTRATION AT SHELL INDUSTRIAL AREA GATE, PORT HARCOURT BY LANDOWNERS

- (a) Notice of Protest at the Shell Industrial Area, Port Harcourt, and Peaceful Protest by landowners at Shell Industrial Area gate; Appendix 49, 49a (Video clip).

## 15. SPDC DECLINED NOMINATION MADE BY RIVERS STATE GOVERNMENT

- (a) SPDC declined a nomination made by Rivers State government for interface and representation on the Enwhe Field Development Project – Gbaran Phase 3; appendix 50, 50a.

## LANDOWNERS INSTITUTE LEGAL SUITS AGAINST SPDC

In the absence of any engagement by SPDC to address our plight, landowners resort to legal suits against SPDC:

1. Chief Simon Maduko vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/166/2018 – Appendix 51 (Writ of Summon)
2. Chief Promise Sunday Igoma vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/168/2018 – Appendix 52 (Writ of Summon)
3. Chief Godpower Mark Akari vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/169/2018 - Appendix 53 (Writ of Summon)
4. Chief Promise Sunday Igoma & Ors vs. Shell Petroleum Development Company Nigeria Limited: Suit No. PHC/PH/CS/ /2018 – Appendix 54 (Writ of Summon).

## ABOUT ENWHE FIELD DEVELOPMENT PROJECT – GBARAN PHASE 3

**Introduction** (*Excerpt from Draft EIA Report – March, 2017, page xiv*) – Appendix 55

The Shell Petroleum Development Company of Nigeria Limited (SPDC), on behalf of its Joint Ventures partners (Nigerian National Petroleum Corporation, Total, and Nigeria Agip Oil Company) conducted a Environmental Impact Assessment studies for the Enwhe Field Development Project (FDP). The Enwhe field development project is an opportunity to sustain gas supply to NLNG and maximize utilization of Gbaran CPF by developing gas and condensate in the Enwhe field. The proposed activities for the





development of the Enwhe field will have various interactions with the environment, hence the need to conduct an Environmental Impact Assessment (EIA) studies in line with the provisions of the EIA Act CAP E12, LFN, 2004 and the Procedural guidelines. This EIA study has identified the key potential impacts of the project activities on Biophysical, Social and Health components within the project area and proffered mitigation measures for Environmental Management. The findings are hereby incorporated in this report.

**Project Location** (*Excerpt from Draft EIA Report – March, 2017, page xiv*) – Appendix 55

The Enwhe field is located in the south-western corner of license block OML 22 and extends into license block OML 23 and is located about 36km to the East of Gbaran CPF. The field is part of the Gbaran Ubie Node which is multi-field oil and gas asset. The Enwhe field is bounded by creek and creeklets of Orashi and Nun River. Major communities in the Enwhe field lies in Yenagoa Local Government Area of Bayelsa State, Ahoada West and Abua/Odual Local Government Areas of Rivers State.

**Proposed Project scope/Overview** (*Excerpt from Draft EIA Report – March, 2017, page xvii*) – Appendix 56

The selected concept for Enwhe Opportunity is the Optimized Development termed “Just about Right Wells and Facilities”. The scope involves mainly drilling, completion of wells and hook-up to the Gbaran CPF.

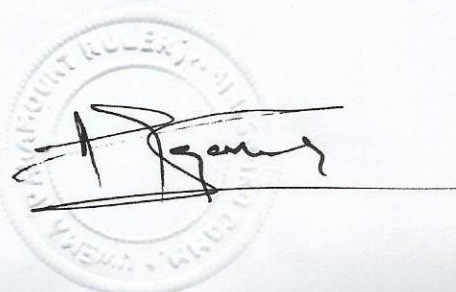
**NAG development Scope:** (*Excerpt from Draft EIA Report – March, 2017, page xix*) – Appendix 57

- Drill and complete 6 wells from 2 wellhead cluster locations.
- Drill one exploration well
- Drill 2 appraisal wells
- Construct 6 x 6” duplex steel flowlines of 1.5km lengths (total length 7 km).
- Install two remote manifold with multi-phase metering and chemical injection skid (Enwhe East and Enwhe West remote manifolds).

**Pipeline scope:** (*Excerpt from Draft EIA Report – March, 2017, page xix*) – Appendix 57

The pipelines’ scope for the Enwhe field development scope will include, but will not be limited to:

- Design and installation of the following flowlines:
  - Three 0.3 km flowlines from Enwhe East locations to Enwhe East NAG Manifold
  - Three 0.3 km flowlines from Enwhe West location to Enwhe West NAG Manifold
- Design and installation of hook-up arms for the NAG wells
- Design and installation of the Enwhe NAG remote Manifolds





- Design and installation of a new 36.41km long, 12" NAG bulkline from the Enwhe NAG Manifold to the Gbaran CPF
- Design and installation of pigging facilities including the pig traps and associated pipework and valves. The Bulkline extends from pig launcher to pig receiver.

**Pipeline Dimensions** (*Excerpt from Draft EIA Report – March, 2017, page xix*) – Appendix 57

- 1 no. x 12" 36km Enwhe – Gbaran CPF Bulkline
- 1 no. x 12" 5.5km Enwhe East – Enwhe West Bulkline
- 3 no. x 6" 0.3km Enwhe East flowlines
- 3 no. x 6" 0.3km Enwhe West flowlines

**SPDC Declined to Grant Series of Audience Request By Aminigboko Community Leadership,** appendix 58.

**Aminigboko Community Expectations / Needs (Infrastructure, Employment, Skill Acquisition, Community Content – Local Sub-contracts)**

*Summary of Aminigboko Community Expectations / Needs*

COMMUNITIES	INTEREST AND EXPECTATIONS
Aminigboko	<ul style="list-style-type: none"> <li>- Resuscitate Aminigboko Cottage Hospital</li> <li>- Rehabilitate Emughan Junction – Aminigboko; Emesu – Emesu Waterside; Owerewere – Okoboh roads</li> <li>- Upgrade Aminigboko Community waterside roads</li> <li>- Construction of Ring Roads in Aminigboko Community</li> <li>- Electricity supply from SPDC station to host community (Aminigboko Community)</li> <li>- Civic Centre</li> <li>- Provision of furniture/laboratory equipments to Primary/Secondary schools in Aminigboko Community.</li> <li>- Scholarships (Secondary / University) for indigenes of Aminigboko Community</li> <li>- Construction of standard market in Aminigboko Community</li> <li>- Construction of Jetty in Aminigboko Community waterside</li> <li>- Build comprehensive drainages in Aminigboko Community</li> <li>- Provision of Solar Street Lights in Aminigboko Community</li> <li>- Staff and Contract Staff employment of Aminigboko Community indigenes</li> <li>- Youth empowerment – skills / handiwork training for indigenes of Aminigboko Community</li> <li>- Women empowerment – skills / handiwork training for indigenes of Aminigboko Community</li> <li>- Build Solar Powered Water Treatment Plant</li> <li>- Build Modular Refinery</li> <li>- Contract award to community members</li> <li>- Full implementation of local content</li> <li>- Full communities stakeholders participation</li> </ul>

