



Human &
Environmental
DEVELOPMENT AGENDA



Please respond to: 15A, Yinusa Adeniji Street, Off Toyin Street, Ikeja, Lagos, Nigeria

Engr. Gbenga Komolafe HNSE
Commission Chief Executive
Nigerian Upstream Petroleum Regulatory Commission (NUPRC)
No. 7, Sylvester Ugoh Crescent,
Off Obafemi Awolowo way,
Jabi District, Abuja,
Nigeria

8 April 2024

Dear Engr. Komolafe,

Shell's sale of SPDC

We write as Nigerian and international non-governmental organisations to urge NUPRC to refuse regulatory approval for Shell plc's proposed sale of all of its shares in Shell Petroleum Development Company (SPDC) to Renaissance African Energy.

NUPRC has a statutory duty to ensure compliance to petroleum laws, regulations and guidelines in Nigeria's Upstream Oil and Gas Sector. Those laws, regulations and guidelines are intended to protect the people of Nigeria from environmental harm and the Federal Republic of Nigeria from having to foot

the bill for the oil industry's legacy of pollution. Newspaper reports confirm your view that these standards apply to the proposed SPDC sale.¹

Shell should not be permitted to use legal gymnastics to escape its responsibilities for cleaning up its widespread legacy of pollution. As documented in the attached report by SOMO, the company's divestment record is replete with examples of onshore oil mining licences being sold without adequate safeguards to protect Nigerians from harm and the Nigerian government from financial liability. Divestments have been agreed with newly created companies that in some cases have little real substance, have opaque backgrounds, or involve complex groups of domestic and foreign investors. In several instances, the buying entities appear to have no stability and/or face financial problems. In a similar previous divestment (the 2010 sale of OML 26 to First Hydrocarbon Nigeria), the majority shareholder of the acquiring company went into liquidation and its Chief Executive Officer and Chief Operating Officer were convicted in the UK of fraud.

In such circumstances, as SOMO notes, there is a major risk that the acquiring companies will disappear, leaving affected local communities with no entity to deal with over pollution, decommissioning and other issues.

This disastrous history cannot be allowed to repeat itself. The sale of SPDC should not be permitted unless local communities have been fully consulted; the environmental pollution caused to date by SPDC has been fully assessed; and funds have been placed by SPDC in escrow sufficient to guarantee that clean-up costs will be covered.

Failure to comply with Regulations

As set out below, the proposed sale of SPDC appears to fall far short of meeting the requirements set out in NUPRC's *Regulatory Divestment Framework* and *Due Diligence Reference List* [**"NUPRC standards"**] and in the *DPR Guidelines and Procedures for Obtaining Minister's Consent to the Assignment of Interest in Oil and Gas Assets 2021*² [**"DPR standards"**].

Our concerns over compliance include the following:

A. Overview of current status of assets, including surface facilities

NUPRC requires SPDC to catalogue the status of all its surface facilities. No such catalogue would currently appear to exist in the public domain. Certainly, its existence has not (to our knowledge) been disclosed in Shell's annual reports. However, from past investigations into the environmental damage caused by oil pollution in the Niger Delta, there is clear evidence of widespread technical problems with SPDC's pipeline infrastructure.

UNEP has singled out SPDC's management record for particular criticism, concluding that industry best practice (which Nigerian law requires to be applied) and the company's own procedures "*have not been*

1 Ownership of oil and gas assets can only be transferred with Minister's consent- NUPRC, Nairametrics, <https://nairametrics.com/2024/02/04/ownership-of-oil-and-gas-assets-can-only-be-transferred-with-ministers-consent-nuprc/>
2 DPR Guidelines and Procedures for Obtaining Minister's Consent to the Assignment of Interest in Oil and Gas Assets 2021, <https://www.nuprc.gov.ng/wp-content/uploads/2021/04/DPR-Guidelines-on-Asset-Divestment-2021.pdf>. Accessed 16 February 2024.

applied, creating public safety issues”.³ The Bayelsa State Oil and Environment Commission, which reported a decade after UNEP, found similar concerns about the condition of infrastructure across that State.

As Amnesty International has documented,⁴ Shell’s own internal experts have repeatedly warned over decades that lack of investment and poor maintenance were causing “*integrity failures*”⁵ (in common parlance, oil spills). For example:

- In 1994, the head of environmental studies for Shell Nigeria, Bopp Van Dessel, resigned, complaining that he felt unable to defend the company’s environmental record, “*without losing his personal integrity*”.⁶
- The same year an internal paper revealed that Shell had not properly funded its pipelines and other infrastructure in Nigeria: “*One measure of this deterioration is the frequency and severity of oil pollution incidents caused by corrosion and other integrity failures in the production system*”.⁷
- In 1996, a Shell Nigeria “*Country Business Plan*” identified that its “*infrastructure (was) poorly designed and maintained*”.⁸
- In 2002, an internal Shell presentation stated: “*the remaining life of most of the [Shell] Oil Trunklines is more or less non-existent or short, while some sections contain major risk and hazard . . . Outright replacement is necessary because extensive corrosion and pressure derating has resulted in system capacity constraints and the inability to guarantee evacuation of future increases in throughputs*”.⁹
- In 2008, a US diplomatic cable stated that a contractor with many years’ experience of laying pipelines in the Niger Delta reported that, “*73 per cent of all pipelines there are more than a*

3 UNEP, Environmental Assessment of Ogoniland Report, 2011, p.14, <https://wedocs.unep.org/handle/20.500.11822/25282>. Accessed 15 February 2024.

4 Amnesty International, Tainted Sale? Why Shell's Divestment from the Niger Delta must not harm human rights,2023, pp.18-19, available at <https://www.amnesty.org/en/documents/afr44/6797/2023/en/>. Accessed 15 February 2024

5 Amnesty, Negligence in the Niger Delta: Decoding Shell and Eni's poor record on oil spills, 2018, p.11, <https://www.amnestyusa.org/wp-content/uploads/2018/03/DecodersReport.pdf>. Accessed 15 February 2024.

6 Shell, “Exit Interview with JP Van Dessel”, 28 November 1994, quoted in Amnesty International, Tainted Sale? Why Shell's Divestment from the Niger Delta must not harm human rights,2023, pp.18, <https://www.amnesty.org/en/documents/afr44/6797/2023/en/>. Accessed 15 February 2024.

7 Shell, “Note for Information: Environmental and Community Relations Issues in Nigeria”, December 1994, quoted in Amnesty International, Tainted Sale? Why Shell's Divestment from the Niger Delta must not harm human rights,2023, pp.18, <https://www.amnesty.org/en/documents/afr44/6797/2023/en/>. Accessed 15 February 2024.

8 The Shell Companies in Nigeria, Country Business Plan, 1996, quoted in Amnesty International, Tainted Sale? Why Shell's Divestment from the Niger Delta must not harm human rights,2023, pp.18, <https://www.amnesty.org/en/documents/afr44/6797/2023/en/>. Accessed 15 February 2024.

9 Cited in Okpabi and Others v Royal Dutch Shell and Another, Claimants' Reply, 31 March 2022, High Court of Justice, Queen's Bench Division, Technology and Construction Court, Claim No HT- 2015-000241, para 51 (b).

*decade overdue for replacement. In many cases, pipelines with a technical life of 15 years are still in use thirty years after installation”.*¹⁰

- In 2009, a Shell employee warned in an email that: “[the company] is corporately exposed as the pipelines in Ogoniland [in the Niger Delta] have not been maintained properly or integrity assessed for over 15 years”.¹¹
- A 2012 study conducted on pipelines in six states in the Niger Delta found that more than 70% of the pipelines were over 20 years old and over 40% were more than 30 years old with much of the infrastructure suffering from mechanical failures due to poor construction and maintenance.¹²
- Most recently, in 2017, a witness statement provided by a former SPDC security manager in a civil claim in the United Kingdom against Shell plc by the communities of Bille and Ogale revealed that spill remediation had been undermined by Shell’s unwillingness to cover its costs. The former Shell employee stated that, “the [Royal Dutch Shell] Board would not sanction significant expenditure” on oil spill remediation unless the other joint venture partners first paid their share of the clean-up costs. As a result, the former employee stated that, “communities which have been dramatically polluted by SPDC oil have had to wait for clean-up for many years, sometimes decades, due to RDS’ unwillingness to pay for the clean-up costs”.

In addition to documenting concerns over the poor state of Shell’s pipelines, Amnesty International and others have criticised Shell for failing to take adequate measures (as required under Nigerian law) to protect its pipelines from sabotage, for example through thicker pipeline walls, concrete casements, improved leak detection systems or the burial of vulnerable pipelines.¹³ Indeed, in court proceedings in the United Kingdom, Shell has acknowledged that it deliberately chose not to proceed with a “project [the Trans Niger Pipeline Loopline] aimed at mitigating the threat of third-party interference with pipelines in Ogoniland”.¹⁴

There are therefore strong grounds for suspecting that any catalogue of surface facilities, if it exists, would reveal substantive problems requiring urgent remediation. Claims to the contrary by SPDC should be treated with utmost scepticism. In that respect, it should be recalled that when Shell left Ogoniland in

10 Wikileaks, “Nigeria: Pipeline Expert Says 73 Percent of Niger Delta Pipelines Need Replacement, Cause Spills, Consulate Lagos (Nigeria)”, 17 December 2008. Quoted in Amnesty International, Tainted Sale? Why Shell’s Divestment from the Niger Delta must not harm human rights, 2023, pp.18, <https://www.amnesty.org/en/documents/afr44/6797/2023/en/>. Accessed 15 February 2024.

11 Amnesty International, Tainted Sale? Why Shell’s Divestment from the Niger Delta must not harm human rights, 2023, pp.19, <https://www.amnesty.org/en/documents/afr44/6797/2023/en/>. Accessed 15 February 2024.

12 Quoted from Bayelsa State Oil and Environmental Commission, An Environmental Genocide: The human and environmental cost of Big Oil in Bayelsa, Nigeria, 2023, p.8. Available through <https://report.bayelsacommission.org/>. Accessed 21 March 2024, referring to Achebe, C. H., Nneke, U. C. and Anisiji, O. E. 2012. Analysis of oil pipeline failures in the oil and gas industries in the Niger delta area of Nigeria. In Proceedings of the International MultiConference of Engineers and Computer Scientists, Hong Kong, 14–16 March 2012; pp. 1274–1279.

13 Amnesty, Negligence in the Niger Delta: Decoding Shell and Eni’s poor record on oil spills, 2018, p.12, <https://www.amnestyusa.org/wp-content/uploads/2018/03/DecodersReport.pdf>. Accessed 15 February 2024.

14 Okpabi and Others v Royal Dutch Shell and Another, Defence, 19 November 2021, High Court of Justice, Queen’s Bench Division, Technology and Construction Court, Claim No HT- 2015-000241, para 150.

1993, many of its facilities were not properly decommissioned or made safe. SPDC also sold the Nembe Creek Trunk Line in such a state of disrepair that it subsequently had to be abandoned.¹⁵

B. Decommissioning & Abandonment (“D&A”) Cost Assessment

The DPR standards require that “where the Assignment is by way of transfer of interest in an Asset held in JV with the NNPC, the Assignor shall submit to the DPR an agreement between the parties on the treatment of the Assignor’s abandonment and decommissioning liabilities”; and that “the agreement shall contain the cost of the abandonment and decommissioning liabilities . . .”¹⁶

The NUPRC standards also require that “applicable D&A costs must be diligently assessed” and “settlement of outstanding obligations” ensured, in order to avert “potential exposure of the Nigerian government to decommissioning liabilities”.

There is no evidence in the public domain that such an assessment of abandonment and decommissioning liabilities has been undertaken – and we deem it highly unlikely that such an assessment exists. While Shell states that it has completed an inventory of assets for decommissioning in Ogoniland, a process which took almost a decade, no similar claim has been made by the company for an inventory of assets for decommissioning elsewhere in Nigeria, notably for the 12 onshore OMLs that Renaissance will acquire. We also note that, during a meeting in August 2023 with Professor Rick Steiner, NUPRC staff were not able to confirm that they have conducted any comprehensive oversight of Divestment, Decommissioning & Abandonment of oil facilities in the Niger Delta.

Without a comprehensive assessment, it is impossible to estimate the extent of SPDC’s decommissioning and clean-up costs – and hence to ensure that sufficient funds are set aside. What is known is that the pollution from SPDC’s operations is considerable with the costs of clean up running into billions of dollars. The Bayelsa Commission estimates that “US \$12 billion will be required over the course of 12 years to repair, remediate and restore the environmental and public health damage”¹⁷ due to oil pollution – and that is for Bayelsa State alone. The Commission ascribes 35% of Bayelsa’s spills in the period 2006-2020 to Shell,¹⁸ putting SPDC’s state-wide clean-up costs at \$4.2 billion. For the Niger Delta as a whole, SPDC’s liability could be several-fold that figure. Indeed, Shell plc had admitted that the liabilities arising just from current damage claim litigation could be material.¹⁹

15 Selling out Nigeria: Shell’s irresponsible divestment, February 2024, p.52ff. Appended as Annex 1.

16 DPR Guidelines and Procedures for Obtaining Minister’s Consent to the Assignment of Interest in Oil and Gas Assets 2021, <https://www.nuprc.gov.ng/wp-content/uploads/2021/04/DPR-Guidelines-on-Asset-Divestment-2021.pdf>. Accessed 16 February 2024.

17 Bayelsa State Oil and Environmental Commission, An Environmental Genocide: The human and environmental cost of Big Oil in Bayelsa, Nigeria, 2023, p.8. Available through <https://report.bayelsacommission.org/>. Accessed 15 February 2024.

18 Ibid, p.19. Citing Watts, M. and Zalik, A. 2020. Consistently unreliable: Oil spill data and transparency discourse. The Extractive Industries and Society, 7, pp. 790-795. Accessed 15 February 2024.

19 Shell plc, Annual Report and Accounts, p.305. Filed with FCA National Storage Mechanism on 9 March 2023, https://data.fca.org.uk/artefacts/NSM/Portal/NI-000069896/NI-000069896_21380068P1DRHJMJ8KU70-2022-12-31.zip. Accessed 21 February 2024

C. Current state of the environment at the time of the divestment

NUPRC requires an assessment of the current state of the environment at the time of a divestment; and the latest approved Environmental Evaluation Study (EES) be provided.

No such EES would appear to have been undertaken by SPDC for its assets. We say this with confidence because any such assessment would have required site visits, of which local people would have been aware. Local communities have not reported any such visits to the public or to some of us that are signatories to this complaint. .

Any EES would be certain to reveal major environmental problems. A 2018 analysis by the human rights group Amnesty International of Shell's disclosed oil spill data reveals that 110,535 barrels or 17.5 million litres of oil leaked from SPDC-operated pipelines from 2011 to 2017²⁰ – a volume that is approximately 5.6 times the amount spilled by BP's devastating Deepwater Horizon's blowout in the Gulf of Mexico (a spill which has cost BP US\$80 billion and counting in clean-up costs and penalties). Amnesty cautions that the true figure is likely to be higher due to the failure of Shell to report 359 additional spills²¹ recorded by the Nigerian government during the 2011-17 period and other deficiencies in Shell's oil spill records.

The environmental and human health toll of such spills has been (and continues to be) devastating. UNEP has concluded that in a significant number of cases the pollution caused by spills from oil companies such as Shell posed "*serious threats to human health from contaminated drinking water to concerns over the viability and productivity of ecosystems*".²²

In Bayelsa State, the Bayelsa Commission reports similar impacts. Drawing on a health impact study based on the collection and analysis of blood samples taken from over 1,600 people in Bayelsa, the Commission reports that "*toxins from oil pollution are present at often dangerous levels across the state and have infiltrated the food chain, ending up in the bloodstreams of those tested in affected communities*".²³

In some locations, "*highly toxic oil-related contaminants such as chromium are present in groundwater at over 1,000 times the WHO [World Health Organization] limit, while in others, concentrations of noxious chemicals, such as Total Petroleum Hydrocarbons, exceed safe levels by a factor of 1 million according to some of the samples taken*".²⁴

20 Amnesty, Negligence in the Niger Delta: Decoding Shell and Eni's poor record on oil spills, 2018, p.5, <https://www.amnestyusa.org/wp-content/uploads/2018/03/DecodersReport.pdf>. Accessed 15 February 2024.

21 Amnesty International, Niger Delta Negligence, 2018, <https://www.amnesty.org/en/latest/news/2018/03/Niger-Delta-Oil-Spills-Decoders/>. Accessed 24 October 2023. Amnesty reports that SPDC recorded 1,010 spills, while the Nigerian Government recorded 1,369. Accessed 15 February 2024.

22 Ibid, p.8.

23 Bayelsa State Oil and Environmental Commission, An Environmental Genocide: The human and environmental cost of Big Oil in Bayelsa, Nigeria, 2023, p.12. Available through <https://report.bayelsacommission.org/>. Accessed 15 February 2024.

24 Ibid, p.12.

Recent research by the University of St Gallen in Switzerland has established that infants in the Niger Delta are twice as likely to die in their first month of life if their mothers live near an oil spill.²⁵ That amounts to an estimated 11,000 premature deaths per year in the Niger Delta.

D. Decommissioning and Abandonment Fund

Section 233 of the Petroleum Industries Act requires that lessees and licensees of oil fields "set up, maintain and manage a decommissioning and abandonment fund held by a financial institution that is not an affiliate of the lessee or licensee, in the form of an escrow account accessible by the Commission or the Authority". The provision applies to the sale of SPDC.

Shell makes no mention in its annual accounts of any Decommission and Abandonment Fund having been established by SPDC. However, when announcing the sale of SPDC, Shell stated that it "is providing additional financing of up to US\$1.3 billion over future years to fund SPDC's share of the development of the SPDC JV's gas resources to supply feed gas to NLNG, and its share of specific decommissioning and restoration costs."²⁶

The statement does not clarify how much of the US\$ 3.1 billion would cover decommissioning versus development of the gas resources in which Shell has a significant commercial interest. Nor does it confirm that the funds will be "accessible by the Commission or the Authority".

NUPRC should not approve the SPDC sale without an escrow account that conforms to the requirements of Section 233 of the PIA being in place. The decision to finance decommissioning should not be made by Shell – Nigerian law is clear that the funds should be in escrow and out of the company's hands. It is also of paramount importance that decommissioning funds made available by Shell should be sufficient to cover the full costs of clean-up and remediation. On the basis of the estimates made by the Bayelsa Commission, the figure would far exceed \$3.1 billion.

We would also strongly urge that the escrow account should be public and verifiable to guard against corruption.

E. Adequate Financial Resources

The DPR standards state that Ministerial consent for the transfer of an interest in an asset held by a joint venture with the NNPC must rest on the Minister being satisfied that the buyer is "of good reputation, or is a member of a group of companies of good reputation, or is owned by a company or companies of good reputation"; and has the "financial resources to work the licence, lease or marginal field, which is being assigned".²⁷

25 Kate Hodal, "'Absolutely shocking': Niger Delta oil spills linked with infant deaths", The Guardian, 6 November 2017, <https://www.theguardian.com/global-development/2017/nov/06/niger-delta-oil-spills-linked-infant-deaths>. Accessed 15 February 2024.

26 Shell plc, 'Shell agrees to sell Nigerian onshore subsidiary, SPDC', 16 January 2024, <https://www.shell.com/news-and-insights/newsroom/news-and-media-releases/2024/shell-agrees-to-sell-nigerian-onshore-subsidiary-spdc.html>. Accessed 18 March 2024.

27 DPR Guidelines and Procedures for Obtaining Minister's Consent to the Assignment of Interest in Oil and Gas Assets 2021, <https://www.nuprc.gov.ng/wp-content/uploads/2021/04/DPR-Guidelines-on-Asset-Divestment-2021.pdf>. Accessed 16 February 2024.

The NUPRC standards similarly require an assessment of “the prospective successor entity’s balance sheet and financial viability” and “suitability, alignment with state interests, reputation, investment objectives, and track record etc”.

In the case of the proposed SPDC sale, Renaissance is a new company with no track record that could be assessed. It has no financial history: and there is scant information available in the public domain on the financials of any of the companies that make up the Renaissance consortium.

The necessary due diligence cannot therefore be credibly undertaken at this time.

Statements made by Renaissance are far from reassuring. The consortium states that it has a collective asset base of “over \$3 billion”.²⁸ As previously noted, the Bayelsa Commission estimates that clean up and remediation of Shell’s pollution in Bayelsa State alone would cost approximately \$4.2billion. In addition, huge investments are required to upgrade the ageing, leaky infrastructure and to safely decommission disused assets.

There are further indications that Renaissance does not have the financial strength to take on such liabilities, which could render the company insolvent. Indeed, the consortium has required financial assistance from Shell plc to acquire SPDC. For example, Shell has confirmed that it is providing “*secured term loans of up to US\$1.2bln, to cover a variety of funding requirements*”.²⁹

Conclusion

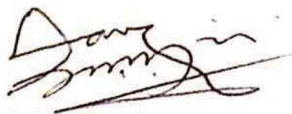
In light of the above, we would strongly urge NUPRC to refuse regulatory approval for Shell plc’s proposed sale of Shell Petroleum Development Company (SPDC) to Renaissance.

To repeat: the sale of SPDC should not be permitted unless local communities have been fully consulted; the environmental pollution caused to date by SPDC has been fully assessed; funds have been placed by SPDC in escrow sufficient to guarantee that clean-up costs will be covered; and the technical capacities of the beneficial entity have been verified and established.

We shall continue to engage this process in furtherance of the environmental laws and regulations governing the divestment, in the overall interest of host communities and their inhabitants.

Please accept the assurance of our esteem regards, while we look forward to your response and action.

Yours Sincerely



1. Olanrewaju Suraju, Chair, HEDA Resource Centre
2. Isa Sanusi, Nigeria Director, Amnesty International

28 Renaissance Africa Energy Company Limited, <https://raecafrika.com/#about>. Accessed 15 February 2024.

29 Shell plc, "Shell agrees to sell Nigerian onshore subsidiary, SPDC", 16 January 2024, <https://www.shell.com/media/news-and-media-releases/2024/shell-agrees-to-sell-nigerian-onshore-subsiary-spd.html>. Accessed 15 February 2024.

3. Adam Heal, Executive Director, Stakeholder Democracy Network
- 4.5 Taiwo Otitolaye, Publish What You Pay (PWYP) Nigeria and Community Outreach for Development and Welfare Advocacy (CODWA), Kwara State, Nigeria
6. Kabiru Garba, Community Enlightenment & Development initiative (CEDI), Zamfara State, Nigeria
7. Enwelum Ogechukwu Uzoamaka, Divine Era Development and Social Rights Initiative (DEDASRI), Enugu, Nigeria
8. Elder Emeka Ogazi, Transparency and Economic Development Initiative TEDI, Ebonyi State, Nigeria
9. Abimbola Agbana, Citizens Right Advocacy (CRA), Ekiti State, Nigeria
10. Gloria Nwafor Onyinye, Care for the Physically Challenged and Destitute Foundation (CAPCADE), Anambra State, Nigeria
11. Center for Environment, Peace and Youth Development (CEPYOD), Niger State, Nigeria
12. Comrade Nana Nwafor, Foundation for Environmental Rights Advocacy & Development (FENRAD) Nigeria, Abia State, Nigeria
13. Lukman Adefolahan, 21st Century Community Empowerment for Youth and Women Initiative
14. Hannah Adeyemo, Community Information and Advocacy Initiatives (CIAI), Katsina, Nigeria
15. Christian Okororie, Center for Rural Economic & Social Development CREESOD, Oguta LGA, Imo State, Nigeria
16. Mohammed Wuyo, Borno Coalition for Democracy and Progress (BOCODEP) Maiduguri, Borno State, Nigeria
17. Chukwudi Arum, Commuters Rights and Development Foundation, FCT, Nigeria
18. Mrs. Mary Ajayi, Community Development Initiatives (CDI) Ogun State, Nigeria
19. Nasiru Lawal Maimagani, Aminci Centre for Social Advocacy and Development Initiative, CSA, Sokoto State, Nigeria
20. Tony Ayoka, Habitat care and Protection Initiative, Imo State, Nigeria
21. Philip Kalio, Support Initiative for Sustainable Development (SISDEV), Port Harcourt, Rivers State, Nigeria
22. Knowledge and Community Development Awareness Initiative (KCOMAI), Jigawa State, Nigeria
23. Women's Organization for Development and Empowerment of Communities. Ogun State, Nigeria
24. Dr. Ahmad Hashim, Millennium Development Centre, Gusau, Zamfara State.

25. Dandalin Matasa Initiative for Rapid Development, Gombe State, Northeast Nigeria
26. Joshua David Kaka, Save life community initiative in Taraba SLICOM-I
27. Tijah Bolton-Akpan, Policy Alert, Nigeria
28. Emem Okon Kebetkache, Women Development and Resource Centre, Port Harcourt, Rivers State, Nigeria
29. Jide Afolabi, Director, Christian Foundation for Social Justice and Equity (CFSJE), Plateau State, Nigeria
30. Muh'd Baba Kucici, Yobe Voice and Accountability Mechanism, Damaturu, Yobe State, Nigeria
31. Segun Fatoki, Nature Advocacy and Development initiatives (NADI), Lagos State, Nigeria
32. Adelowo Bamgbade Abubakar, Centre for Development and Government Accountability (CEDGA), Lagos, Nigeria
33. Chima Williams, Environmental Rights Action/Friends of the Earth Nigeria
34. Ashem Timayi, Rural Communities Initiative (RCI), Lagos, Nigeria
35. Monday Osasah, African Centre for Leadership, Strategy & Development (Centre LSD), Abuja, Nigeria
36. Comrade Olurotimi Falola, Initiative for Developments and Advocacy, Lagos, Nigeria
37. Audrey Gaughran, Director, SOMO (Center for Research on Multinational Corporations), The Netherlands
38. Simon Taylor, Director, Hawkmoth, The Netherlands
39. Antonio Tricarico, ReCommon, Italy
40. Nicholas Hildyard, The Corner House, UK