REQUEST FOR INSPECTION BY REPRESENTATIVES OF THE COMMUNITIES IMPACTED BY THE WEST AFRICAN GAS PIPELINE PROJECT IN LAGOS STATE, NIGERIA

1. DESCRIPTION OF COMPLAINANTS

This complaint is brought by the IFESOWAPO HOST COMMUNITIES FORUM ON THE WEST AFRICAN GAS PIPELINE PROJECT, Lagos State through their representatives from Olorunda Local Government Area of Lagos State, Nigeria: High Chief Nuru Ashade, Mr. Toyin Hassan, Alhaji Alani Ajose and Ishola Hassan. (Please see annex I, including copies of letters authorizing the requestors to submit this complaint on behalf of the Association).

The Association is made up of the 12 communities to be impacted by the West African Gas Pipeline Project (WAGP) around the Badagry axis, in Lagos state, South-west Nigeria. These communities are Ajido, Imeke Agemowo, Araromi Ale, Idaghe Iyesi, Ilogbo Eremi and Igbesa communities; others are Okoomi, Itori, Oloya/Abiola, Arobieye, Igboliye and Egushi Benja communities. High Chief Nuru Ashade and Mr. Toyin Hassan are both directly impacted by this project because their lands were acquired. Alhaji Alani Ajose and Alhaji Ishola Hassan are members of the communities and principal members of the Association.

We found that this project has violated the following World Bank policies:

1) OP 13.05 on Project Supervision;
2) OP/BP 4.12 on Resettlement;
3) OP/BP 4.01 on Environmental Assessment;
4) OP/BP 10.04 on Economic Evaluation of Investment Options

We believe that the West African Gas Pipeline Project, if executed as presently conceived, would do irreparable damage to the land and consequently, destroy the livelihoods of the 12 communities. This is why we are filing this complaint with the Inspection Panel.

Efforts to raise concerns

We have made strenuous efforts to make the views that we have canvassed here available to the proponents of the project and the Bank itself, including during visits of the West African Gas Pipeline Company (WAPCO) and the World Bank, the first of which took place on October 30, 2004 at Whispering Palms at Badagry, Lagos and the second in June 2005

However, we are disappointed with the complete inaction taken to address our concerns. We also know that several organizations have raised these same concerns with the Bank at forums such as during the civil society consultation with the Bank's team to Nigeria on 29 October 2004. We have therefore decided to use the Inspection Panel to further reiterate that our concerns and fears have not been addressed neither by the Bank nor the proponents of the project.

2. PROJECT DESCRIPTION

The West African Gas Pipeline Project is a project which aims to deliver gas from Nigeria via an approximately 680 kilometre long pipeline which cuts across 23 communities in Ogun and Lagos states South Western Nigeria to a terminal point in Takoradi Ghana. The 58 kilometres of the pipeline and other ancillary facilities that would be constructed by the West African Gas Pipeline Company from Alagbado to Ajido in Lagos state south- western Nigeria would pass through and be placed on the lands of these 23 communities, totalling over one hundred and forty thousand people.

The WAGP will connect with the existing Escravos-Lagos Pipeline (ELP) at Alagbado "TEE" north of Lagos. The onshore pipeline (trunkline) will be buried at 1 meter depth on land and at 8 metres depth offshore (in sea). From Alagbado "TEE", a 30 inch pipeline will extend 55 kilometres southwest to Badagry beach where the gas will be compressed at a station, yet to be built by the WAPCO. A map is available in the Executive Summary of the WAGP Project Document (figure ES-5 entitled Communities Map for Onshore Pipeline route, Nigeria).

The project is designed to substitute natural gas from Nigeria for alternate fuels used by power, industrial, mining and commercial sectors in Ghana, Togo and Benin Republic. It is touted as a regional integration project, supporting the World Bank's Regional Integration Assistance Strategy (RIAS) and complementing the proposed West African Power Pool (WAPP) project. The project is also said to be a cardinal part of the plans of the New Partnership for Africa's Development (NEPAD).

According to the World Bank, the rationale for the Bank's involvement in this project is that "the project would lead to the introduction of private sector financing and expertise into regulated sectors of the economies of the participating West African States."[1]

The entire project is estimated to cost USD$600 million. The World Bank's International Development Association (IDA) and Multilateral Investment Guarantee Agency (MIGA) are involved in the project by: providing financial and political risk guarantees for the project, aimed at safeguarding the investments of oil transnationals, Chevron and Shell, by ensuring that the government of Ghana does not fail in its payment obligations under the contract and providing support for the implementation of national and regional legal and policy frameworks required to kick-start gas market development in Ghana, Benin and Togo. Specifically, in November 2004 the World Bank's IDA approved a $50million guarantee to the government of Ghana while MIGA approved a $75million guarantee to WAPCO.

[1] Project Appraisal Document (Report No: 30335-AFR) page 6.

For some time now, our communities, supported by civil society groups, have been expressing concerns in relation to the project. These issues include:

- payment of inadequate compensation to landowners;
- the manner in which Environmental Impact Assessment was carried out;
- the inability of the communities and groups to pinpoint the location where the draft Environmental Impact Assessment document was displayed;
- the project's unconvincing approach to the issue of gas flaring;
- the failure of the proponents of the project to carry out an Environmental Impact Assessment in areas along the existing Escravos-Lagos pipeline that will feed gas into the new pipeline.

3. BANK POLICIES VIOLATED BY THE PROJECT

3.1 Project Supervision

The World Bank's OP 13.05 requires the Bank to ***ensure that the borrower implements the project with due diligence and to identify and take steps to resolve problems in implementation.*** As will become clear from the elaboration below, we feel strongly that the World Bank has failed to comply with this policy.

Many of the problems caused by the WAGP project's sponsors were not anticipated or resolved by the World Bank as required by this policy. We consider the problems with the project sponsors mentioned below a result of the World Bank's failure to adequately supervise the project's preparation and implementation.

3.2 Resettlement Policy

The project as presently being implemented violates the Bank's Operational Policy/Bank Procedure 4.12 of January 2002 which in essence requires that ***people who are losing their lands or livelihood as a result of a Bank financed project should benefit from the project and should have their standard of living improved or at least restored.*** This policy stated here was not complied with in our communities.

We have complained various times to different stakeholders in the project, the government, the project owners (West African Gas pipeline Company), etc on our fears and concerns on inadequate compensation. We are convinced it will not restore or improve our standard of living.

Members of our communities were assured that 'adequate compensation would be paid on the basis of rates established by the Nigerian government and that these rates would be further increased to reflect inflation adjustment and restoration of lost incomes'. With the benefit of hindsight, we now believe that these statements provided precious little information on the exact amount of compensation that we were to receive for each plot of land acquired for the project.

The project sponsors kept us in the dark about this and other information relating to adequate compensation that should improve our standard of living. There were assurances from project sponsors that the rates for lease of land in our communities set by the Nigerian government would not be used in computing the quantum of compensation to be paid. But to our surprise, when the compensations were eventually paid, the rates were in most cases less than 4% of the market rate.

In a petition to the "Chief Executive Officer" of the West African Gas Pipeline Company by representatives of the OGABI/ORISAFUNMI families of Imeke town Olorunda Local Government Area, dated March 14, 2004[2], the families respectively stated "that upon commissioning our surveyor to measure out the portion of our family land that falls within the gas pipeline route, it was discovered that 2 acres of our family land falls within the route ...at the moment a plot of land measuring 100ft by 50ft in Imeke community can be sold (leased) for at least N250,000 (two hundred and fifty thousand naira only) this is about $USD 2,000". The petitioners continued "Two Acres of land at that rate will attract N3, 000,000 (three million naira only) or $23,100 ... our family should be adequately compensated for the lost (sic) which will definitely be occasioned." The petitioners further stated ... "we duly acknowledge the receipt of N400, 000 (four hundred thousand naira only) or $3,600 already paid as compensation to the family".[3] It is important to state here that one of the signatories, Hon. A.O. OGABI, is the Chairman of Olorunda Local government, the highest ranked elected official in the local government area.

There were no binding contractual relations between individual landowners and WAPCO. The sponsors of the project merely paid at their own discretion. They provided compensation for the crops on the land only and did not pay anything for the land and future profits that are accruable from the activities that we would have undertaken on our lands.

Our request for cash compensation instead of relocation in many instances was informed by our fear of the unknown. These lands are our ancestral lands and we cannot leave it to total strangers while moving to some other location to reside. Ruling elites in the country in connivance with the oil multinationals have by their actions and inactions enhanced poverty in our communities. But this does not give them the right to take our lands or pay us next to nothing as compensation when we opted to stay on our land.

Public Consultations and Disclosure

Still under OP/BP 4.12: Not all stakeholders had access to the project information, and the information provided was not understood by members of our communities. That is why the expectations of our community people were unnecessarily raised on

[2] The letter was titled: 'Re: Acquisition of part of Ogabi/Orisafunmi Family land at Imeke in Olorunda Area of Badagry Lagos State for the West-African Gas' and the signatories were Honourable A.O.OGABI and Mr. SHINA AKINOLA for the OGABI and ORISAFUNMI families.

[3] The value of the naira to the dollar at the official market at the time of this petiton hovered between 135-132 naira to the dollar.

the compensation we were to receive. Until the day some of us collected our compensations, we had no idea of the criteria used for computing the compensations to be paid for the acquisition of our lands. We believe that there was a deliberate policy not to disclose all relevant information in order to get our support for the project.

The manner the little consultation that took place was carried out is a recipe for crisis and violence in our communities. There are still tensions between the landowners and those of us whose lands were not acquired but whose livelihood would invariably be affected by the project. Some of us would lose our farmlands; others may be denied easy access to their farms and fishing grounds. We believe that the sponsors of the project employed the classic divide and rule strategy to their full advantage. Our community members have yet to resolve the bitterness and bickering that was the hallmark of the selective consultations which took place with a few landowners, while other land users and impacted persons were ignored.

In another example of conflicts that arose, families were against each other owing to what some members perceived as the small amount of compensation declared by their family heads who signed for and collected compensation cheques on behalf of their families. Family heads were suspected to have stashed part of the compensation for their private use. This perception was entirely false, but as there was hardly any information on the quantum of compensation to family heads, rumours of dishonesty on the part of family heads were rife and these led to bitter quarrels and even physical fights. It is pertinent to note that a family in the sense used here denotes the extended family system practiced widely in our communities.

There were also instances where the land owners and the land users (those who lease lands for farming) clashed over who should be paid compensation and how the compensation that has been paid should be shared.

3.3 Policy on Environmental Assessment

We assert that the project violates the Bank's Operational Policy/Bank procedure 4.01 of March 1999, which requires a ***careful analysis and mitigation, and avoidance of the environmental and social impacts of a project.*** It is a key requirement of this policy that public consultation with all key stakeholders be undertaken and that relevant documents be disclosed.

Public Consultation

It is sad to note that the overwhelming majority of our people were not consulted during the preparation of the Environmental Impact Assessment report on the project, nor after announcements in the national daily newspapers that draft copies of the Environmental Impact Assessment of the project were on display at different locations.

In our presentation to the team of consultants from the World Bank that visited our community on October 30, 2004 we stated thus "we shall appreciate a proof (sic) as regards venue, time and list of community people that attended the public hearing on the EIA besides the landowners with whom the company holds periodic meetings on the subject of compensations".

Although the majority of our community people are not landowners, the pipeline would pass very close to our homes, through routes our children take to their schools, routes our women take to their farms and to our fishing grounds. This makes us significant stakeholders. And we feel aggrieved that we were not consulted until the visit of the team of consultants from the World Bank, which included Thomas Walton, Arbi Ben-Achour and Yasmin Tayyab on October 30, 2004 in Badagry. During this visit, it was evident that there was a lack of adequate consultation with the people as no one from our communities in the Badagry axis of Lagos state was able to identify what was in the Resettlement Action Plan. We have had the opportunity of reading the Project Appraisal Document Report No 30335-AFR of November 2, 2004 of the team of consultants referred to above. We are very worried that this important aspect of the meeting was not highlighted in their report. Moreover, our support for "a project that would utilize presently flared and harmful associated gas" was misconstrued as giving blanket support for this project.

Information Disclosure

We visited the Badagry and Olorunda local council secretariats in January 2004 in order to make informed comments on the EIA. However, this was impossible because the document was unavailable. We understand that it is now available on the Internet. But looking at the size of the document, the low literacy level in our communities and non-availability of internet service in our communities, it will take us forever to decipher what is in the document. It also means we would have to hire consultants to comb through the EIA documents seeking relevant data that we may need to respond to.

In addition, it would have been helpful if relevant portions of the large documents had been reproduced in Yoruba, the language commonly used in our communities, and distributed to impacted communities. This, no doubt, would have assisted us make the informed comments required by the sponsors and the World Bank. At this moment, all though land acquisition has been completed and clearing of the right of way is in progress, there is still no translation of the Resettlement Action Plan into Yoruba.

Scope of the EIA

The failure of the project proponents to carry out an Environmental Impact Assessment of the existing Escravos –Lagos Pipeline, to which the West African Gas Pipeline will be linked, is a major source of concern for us. In some cases, the route of the pipeline is only a few feet away from our homes and passes close to our schools, farms and fishing grounds. We are very worried that the Escravos-Lagos pipeline, which is shut down several times a year because of poor maintenance and accidents, will source the WAGP pipeline.

It is the generally known here in Nigeria that the Escravos-Lagos pipeline is not safe. We will not feel safe either until a proper EIA has been carried out on the Escravos – Lagos section of WAGP so that its potential impacts on the safety of WAGP are made clear and available for all to see. Such an EIA is essential to determine the West African Gas Pipeline Project's environmental impacts.

We are convinced that the unsafe state of the Escravos-Lagos Pipeline implies a serious danger for the safety of the West African Gas Pipeline and all who live in its proximity. We do not wish to become victims of gas explosions and leaks like our brothers in one of the states in the Niger Delta where on September 12, 2003, a gas pipeline owned by Shell (one of the sponsors of the WAGP project) that supplies gas to the aluminium smelter plant, exploded. This led to the death of community people and to their relocation away from their communities. Importantly, we know that emergency response mechanisms in this country is totally non-existent. There were two major air mishaps late last year in Nigeria, one of them happened at Lisa village a few kilometres away from our communities and it took the search and rescue team of the National Emergency outfit two whole days to locate the site of the crash. We have been told that there is an emergency response and contingency plan to minimize impacts of disasters, but we are totally unaware of its content or adequacy because of the little information we have.

3.4 Policy on economic evaluation of investment options

Another very important policy that was violated is the Operational/Policy and Bank Procedure 10.04 of September 1994, which requires that the Bank ***evaluate investment projects with the aim of ensuring that they promote the development goals of the country, to do a proper consideration of feasible alternatives including the "without project" situation (as also required by OP 4.01) and to evaluate the sustainability of the projects.***

Development goals

We believe that this project would not promote the holistic development in our community and even in our country as it is premised on the false assumption that it will reduce the flaring of associated gas in Nigeria. From the facts in the documents available to us it is unquestionable that Nigeria is the biggest gas flaring country in the world. Flaring contributes to the destruction of the lands and rivers in our country, to serious health problems and to the global phenomenon of Climate Change. As such, gas flaring is doing great harm to the environment, health and livelihoods of Nigerians. In addition, flaring as opposed to capturing gas entails an economic loss. According to estimates of the World Bank itself, it costs Nigeria about US$2.5 billion annually.

The WAGP project's proponents claim that associated gas (which is normally being flared) will be the source of the pipeline. We, in conjunction with Environmental Rights Action/Friends of the Earth Nigeria, have requested information that would show that this is the case. The question is important, since the fields in the Western Niger Delta where the gas for WAGP will be sourced, are generally non-associated gas fields. This means additional gas would be drilled instead.

Currently, the WAGP project design does not demonstrate in concrete terms that any amount of associated gas would be piped through the pipeline. As the World Bank itself has said, 75% of gas flaring in Nigeria is a result of the failure of proponents of the West Africa Gas Pipeline Project to put in place the necessary infrastructure to enhance gas utilization in the country[4]. In this situation, it is inappropriate for the Bank to support WAGP, as it allows project sponsors to continue the unwarranted degradation of our environment and livelihoods.

In this respect, the Bank also failed to take into consideration Nigeria's plans to double oil output to 4 million barrels of crude oil per day (from the present 2.5 million barrels per day) by 2010 and the expected increase in new oil field development. This will inevitably lead to the production of more associated gas.

Without guarantees that WAGP use only associated (otherwise flared) gas, the World Bank's support for WAGP will increase the use of non-associated gas, which is cheaper to produce than associated gas. WAGP would thus set a precedent of looking solely at profit margins, rather than the best development interest of the people of this country.

Even at the level of the supposed economic benefit of the project for us as a community, we think this claim is patently false, illusory and diversionary. Firstly employment opportunities would only include temporary manual labour during construction work. As far as we know, no mechanism has been put in place to ensure that qualified persons from the community with the relevant academic credentials are put through training to secure employment on a full term basis. This is despite the fact that we have compiled and submitted the names of graduates from our communities in different fields, especially in the area of engineering.

We therefore think that this project will further impoverish the people of our communities. We will lose our lands, which are our only means of livelihood, without adequate compensation, while on the other hand we do not have the prospect of long term alternative employment. We have often made the point that we would not accept to be mere onlookers in this project, and that we want to be an important part of the project, but it seems that there is a deliberate move to push us aside with one excuse or the other.

[4] Joint UNDP/World Bank Energy Sector Management Assistance Programme 2004

Taking into consideration this situation, the violations of World Bank policies documented here which have adversely affected our rights and interests, and the lack of response to our concerns, we are requesting the Inspection Panel recommend to the World Bank's Board of Executive Directors that the Panel undertake an investigation of the West African Gas Pipeline.

We hereby authorize the Panel to make this request public.

27 April 2006

IFESOWAPO HOST COMMUNITIES FORUM ON THE WEST AFRICAN GAS PIPELINE PROJECT, Lagos State, represented by:
High Chief Nuru Ashade
Mr. Toyin Hassan
Alhaji Alani Ajose
Ishola Hassan

Contact Address:

Ifesowapo Host Communities Forum on the West African Gas Pipeline Project
c/o Balogun Adinni Shopping Complex, Imeke, Olorunda Local Council Development Area.
Badagry Local Government Area, Lagos State, Nigeria.

Or

c/o Environmental Rights Action/Friends of the Earth-Nigeria
10 Ibaa Street, Off Okomoko Street, D-Line, Port Harcourt, Nigeria.
Tel/fax: +234 84 236365
assume@eraction.org

Annexure:

1. Community signatories to the request for inspection by the Ifesowapo Host Communities Forum on the West African Gas Pipeline Project
2. Letter of consent by Hassan Isikalu Family of Imeke.
3. Letter of consent by the Idomo-Ipara Family of Ilogbo-Eremi
4. Open letter to the World Bank Concerning the West African Gas Pipeline, December 18, 2000

Idomo-Ipara Family.

Ilogbo-Eremi.

C/o Alhaji Chief Nurudeen Ashade.
Olorunda Local Council Development Area,
Badagry Local Govt.
Lagos State, Nigeria.

Secretary Ifesowapo Host Communities Forum on WAGP Project.
Balogun Adinni Shopping Complex,
Imeke-Badagry.

Letter of Consent to Complain against WAGP Land Compensation.

My family at a meeting held in respect pf the compensation made by WAPCO for the land acquired for the purpose of laying West Africa Gas Pipeline and resolved that representation should be made to the World Bank to complain the inadequacy of the compensation made for the land acquired from the family.

It is a matter of common knowledge that the family would have made far more than the amount paid if the land is sold or leased to anyone around not to talk of a company.

However, as against stopping the project in whatever form, we have chosen to write to you the family consent to write and obtain the market value as compensation for the land.

You are by this letter authorized to write to the World Bank to seek for the review of the compensation on behalf of the family.

Thanks,

Alhaji (Chief) Nurudeen Ashade.
For & on behalf of Idomo-Ipara family.

HASSAN ISIKALU FAMILY.

C/o Toyin Hassan.
Iga Baale Quarters, Imeke
Olorunda Local Council Development Area,
Badagry Local Govt.
Lagos State, Nigeria.

Secretary Ifesowapo Host Communities Forum WAGP Project.
Balogun Adinni Shopping Complex,
Imeke.-Badagry.

Letter of Consent.

You will recall several complaints and reports made to you at the meetings of the Forum about the inadequacy of the compensation paid to us on the land acquired for the on-going West Africa Gas Pipeline Project. We have also held several meetings at our family level.

At the last family meeting held at the instance of the over-all head, it was resolved that a formal complaint be made to the World Bank and other relevant authorities about the inadequacy of the compensation paid.

Since you are the link between us and various organizations involved, we are by this letter giving our consent to you to make adequate formal complaints to the World Bank on behalf of Hassan family in respect of the compensation matter.

Toyin Hassan.
For & on behalf of Hassan Family.

Open Letter to the World Bank Concerning the West African Gas Pipeline

Monday, December 18, 2000

James D. Wolfensohn
President
The World Bank
1818 H Street, N.W.
Washington DC, 20433
USA

Dear President James Wolfensohn,

We, the undersigned organisations and individuals from around the world, wish to express our solidarity with the local communities of the Niger Delta area and Nigerian civil society organisations who have rejected the West African Gas Pipeline project and requested that The World Bank should discontinue any support for the project. We share the concerns of the communities that the project would aggravate environmental devastation, human rights violations, communal conflicts and impoverishment of the communities in the gas fields and pipeline route.

We understand that the World Bank funded the initial feasibility study for the West African Gas Pipeline and continues to support the project, which will transport natural gas from gas fields in the Niger Delta of Nigeria to special consumers in Benin, Togo and Ghana. The project is being developed by a consortium of transnational oil corporations including Chevron and Shell in partnership with the state owned Nigerian National Petroleum Corporation, Ghana National Petroleum Corporation, Societe Beninoise de Gaz and Societe Togolaise de Gaz. The partners signed agreement for the project in 1999 and construction of the pipeline is expected to be concluded by 2002. The World Bank has been working with the governments of Nigeria, Benin, Togo and Ghana to set a fiscal and regulatory structure to make the project profitable for the corporations.

By continuing to support this project, the World Bank is encouraging the corporations and the governments involved to ignore even the most basic processes to protect the natural environment and the livelihood of local populations. Though the pipeline will have negative impacts on the natural environment and the local communities, the communities have not been informed about the nature of the project, as prior consultation with the communities is clearly not a consideration for the consortium. Also, a transparent and inclusive Environmental Impact Assessment (EIA) process was not carried out in all the countries involved. It is unfortunate that months after representatives and indigenes of local communities in Nigeria's Niger Delta,

delegates from Ghana, Benin Republic and Togo as well as concerned NGOs and social movements met in Effurun, Delta State, Nigeria between 14 -15 March 2000 and protested the absence of consultation and EIA, Chevron, the managing sponsor of the project and the Nigerian government have been carrying on with total contempt for the objective fears of the communities.

Consultation:

Although the project was conceived before 1993 and a Memorandum of Understanding was signed as far back as August 1999, members of the communities in the gas fields where Chevron's gas gathering facilities are located and communities along the proposed pipeline route have been ignorant of the project. This is because Chevron has maintained a high level of secrecy, refusing to inform and consult with the communities that will bear the impacts of the project. We, therefore, conclude that Chevron and her partners are not willing to address the fears of the communities, which have arisen with the history of violations and destruction associated with Chevron and the other transnational oil corporations. Chevron, the managing sponsor of the West African Gas Pipeline, is currently being sued in U.S. courts for their role in aiding and abetting the Nigerian military in killing and torturing unarmed civilians protesters on two separate occasions, on the Parabe platform and in of Opia and Ikenyan villages on May 28, 1998 and January 4, 1999, respectively.

Similarly, Shell, a member of the consortium is responsible for numerous killings and rights violations in the Niger Delta area.

Chevron has failed to give adequate information in response to enquiries by civil society organisations in Nigeria, Ghana and Togo. The responses to organisations have been scanty and self-contradictory. In some of the responses, Chevron claims to be committed to consultation with host communities. However, with the project billed to commence by 2001 and construction expected to be concluded by 2002, there would not be enough time for adequate consultation considering the magnitude of the project and expected impacts.

For example, in March, 2000, Chevron failed to show-up in an information and consultation meeting to discuss the WAGP with local communities, civil society organisations, media, government agencies and experts from Nigeria, Ghana and Togo, though the independent organisers had invited the company and officials of the company had announced that the company would be sending representatives.

Similarly, the Nigerian National Petroleum Corporation (NNPC) failed to turn up for the information and consultation meeting despite the prior indication of willingness to attend during meetings with the organisers.

The governments of Nigeria, Benin, Togo and Ghana also have not demonstrated any real commitment to consultation with local communities and civil society organisations.

We must point out that a favourable condition for democratic participation in decision-making of local communities does not exist in the Niger Delta area of Nigeria, due to continuing militarisation of the area and central government legislation that deprives the local communities of all rights to ownership and control of land. With the government having the power to arbitrarily expropriate communal land for oil and gas development, the people are quite powerless to engage in any meaningful participatory consultation with oil companies and the state.

Environment:

The West African Gas pipeline project, like similar projects in the Niger Delta area of Nigeria and other tropical countries, will surely affect the natural environment upon which the communities depend for survival. The wetlands and the mangroves that the pipeline will traverse are universally registered as fragile ecosystems. We are all aware of the devastating impacts the reckless activities of Chevron, Shell and the other transnational oil companies involved in the exploitation of oil and gas have had on the natural

environment of the Niger Delta area. It is worrisome that despite the fact that there are a few legislative stipulations as to how projects should be organised, the oil companies and government agencies almost always ignore such stipulations.

Though an Environmental Impact Assessment (EIA) is a statutory requirement, which should precede projects of this nature in Nigeria, Chevron has not conducted any EIA for the West African Gas Pipeline. However, gas sales contracts have either been signed or are being negotiated. That Chevron and its partners will conclude agreements for gas sales and project construction before a consideration of the real cost of the project on the natural environment and the local communities is unacceptable to us. It should be unacceptable to the World Bank.

The West Africa Gas Pipeline will not contribute towards the truly sustainable development of any of the communities in the targeted countries. The fact is that the gas is not destined to supply the real needs of the communities but those of unsustainable industries. In Ghana, the gas will be consumed mainly by the gold mines. The result will be the expansion of unsustainable gold mining activities and the resultant exacerbation of environmental degradation and destruction of the livelihood of local populations. Hence the project is totally contrary to the commitment to sustainable development.

Furthermore, at a time when the world needs to decrease its reliance on fossil fuels because of the global threat of climate change, this project will further increase the world's reliance on fossil fuels.

We are aware that the project is being promoted as one that would contribute to the reduction of gas flaring, a serious environmental problem that has been created by the oil companies and the Nigerian government. It is our position that oil companies and the government should be responsible for correcting the problem of gas flaring, which they have created. Reduction of gas flaring should not be tied to profit considerations, as is the case with the West African Gas Pipeline and similar projects of its kind.

Despite the claims of the consortium, there is no guarantee that the flaring of ASSOCIATED GAS will be reduced as a result of the West African Gas Pipeline. If the West African Gas pipeline will collect natural gas from special non-associated gas fields, as is the case with the Nigerian Liquefied Natural Gas Project, then there will not be any reasonable reduction of gas flaring. The gas that is flared in the Niger Delta area is ASSOCIATED GAS. Any project that will lead to considerable reduction of gas flaring should be based on a programme aimed at collecting associated gas. The responses to the enquiries of civil society organisations on this matter indicate that Chevron and other members of the consortium do not have a clear programme for the reduction of flaring of ASSOCIATED GAS.

Gas flaring by oil companies operating in the Niger Delta area is not just a problem for the local communities. The planet earth is affected as the emission of major greenhouse gases such as carbon dioxide and methane from this area contribute significantly to the problem of global climate change. Chevron accepts the problem that it creates and is promoting the West African Gas Pipeline as a project that will contribute to mitigation of global climate change. Chevron is, therefore, asking for credit under the Clean Development Mechanism. However, what this amounts to is that Chevron is asking to be rewarded for attempting to solve a problem it created. Besides, without a clear plan for the reduction of the flaring of ASSOCIATED GAS, it would amount to a faulty decision by_ anyone that intends to grant Chevron any carbon credit for the West African Gas pipeline. Furthermore, we object to Chevron and other companies profiting from reducing gas flaring; we believe the communities that surround these flares must be compensated for years of health and environmental problems associated with gas flaring before any company profits from gas flare reduction

Human Rights:

Despite the recent hand-over of power in Nigeria from military to civilian rule, grave violations of human rights persist in the Niger Delta area of Nigeria, with increasing brutal repression of peaceful community protests, extrajudicial executions, detentions without trial, violation of livelihood etc. Hopes that the current civilian government would better address the Niger Delta discontent dimmed with the massacre, in November 1999, of Odi residents and the total destruction of Odi town by Nigerian soldiers on the orders

of the civilian President, General Olusegun Obasanjo.

Without prior consultation with communities and with a pervading climate of insecurity in the Niger Delta area, there is no guarantee that killings and other rights violations will not be a consequence of the West African Gas Pipeline Project.

Communal Chonflict:

The expropriation of communal land and degradation of communal farmland and wetlands by Chevron and the other oil companies in the Niger Delta area have resulted in scarcity of agricultural land and fishing ground. The result has been an increasing commodification and competition for land. Communal conflicts for land have been assuming an increasingly violent character with destruction of lives and property.

Also, with the impoverishment and political marginalisation of the minority peoples of the Niger Delta area, demands for self-determination and resource control is increasing among communities in the area. Some of the communities have openly called on oil companies to withdraw from their areas pending the resolution of these issues. With these crises still unresolved by the Nigerian State, any new project of the magnitude of the West African Gas Pipeline will certainly contribute to worsening the condition for violence and destruction.

Based on the foregoing, and in support of the local communities we demand that the World Bank discontinue support for the West Africa Gas pipeline until:

1. The Nigerian state, which is a part of the West African Gas Pipeline consortium, addresses the issues of access to land, resource control, livelihoods and self-determination for communities and peoples of the Niger Delta area;
2. The Nigerian central government discontinues its programme of militarisation of the oil- bearing Niger Delta area and create a condition for democratic participation;
3. Chevron and the Nigerian government address the fears of the local communities. These fears as articulated by the people themselves include: The absence of an all-inclusive Environmental Impact Assessment, the grave environmental devastation that will result from the project including deforestation, explosions, the fragmentation of habitats and wildlife corridors and the blocking of water bodies, cultural dislocation as well as economic impoverishment.

Thank you.

Isaac Osuoka
Environmental Rights Action / Oilwatch Africa Network

cc:

The President, Federal Republic of Nigeria
The President of Benin Republic
The President of Togo
The President of Ghana
The President, Chevron Corporation
The Director of PCF of the World Bank

Contact Information:

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The World Bank
INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT
INTERNATIONAL DEVELOPMENT ASSOCIATION

1818 H Street N.W.
Washington, D.C. 20433
U.S.A.

(202) 477-1234
Cable Address: INTBAFRAD
Cable Address: INDEVAS

March 1, 2001

Mr. Isaac Osuoka
Environmental Rights Action/Oilwatch Africa Network
13 Agudama Avenue D-Line
P.O. Box 13708
Port Harcourt
Nigeria

Dear Mr. Osuoka:

Ref: *West Africa Gas Pipeline Project*

Thank you for your letter of December 18, 2000, addressed to Mr. Wolfensohn regarding the West Africa Gas Pipeline Project. Mr. Wolfensohn has asked me to respond on his behalf to the concerns raised by your organization and the organizations and individuals listed in the attachment to your letter. These concerns are based on the assessment and perceptions of the affected communities, and the listed organizations and individuals, that the project would aggravate environmental devastation, human rights violations, communal conflicts, and impoverish the communities in the gas fields and along the pipeline routing.

This envisaged regional pipeline represents an investment of about US$510 million and is intended to transport gas from Nigeria to key import terminals in Benin, Togo and Ghana. The pipeline, as envisaged by the investors, would extend for approximately 800 km, predominantly offshore, with the exception of a 57-km link to the Escravos Lagos Pipeline and spurs to Cotonou, Lome and Tema. Initially, the principal gas consumers would be Ghana's thermal power generators.

The Bank provided technical assistance to the governments of Ghana, Togo and Benin during the early phases of the project (1995-1999) to help these governments examine the concept and assess its feasibility. The Bank funding for the technical assistance expired in mid-1999. Thus far, the Bank's involvement has been to assist the concerned governments explore the project idea and the project's potential contribution to the development of the West Africa region. Currently, the World Bank has no commitment to support the project beyond these initial phases and has not reflected the project in its lending program.

Because the project's viability depends on a complex set of technical, economic, environmental and social factors, discussions are continuing among the sponsors and the four governments on the conditions under which the project would be feasible. The World Bank Group is maintaining contacts with the principal parties. For the Bank to be in a position to consider further this project, it would have to be satisfied that it is

technically, economically and financially viable and complies with the Bank's safeguard policies and fiduciary requirements. The responsibility for preparing environmental assessments, resettlement plans, indigenous people's plans and other documentation rests with the project developers. They are fully aware that any form of World Bank Group support would depend, among other things, on compliance with Bank policies, including an analysis of alternatives; and environmental and social management plans to diminish adverse effects identified by the environmental and social analyses. These plans would also need to adhere to the Bank's guidelines.

The Bank is committed to public consultation and disclosure of environmental and social information and would, should it consider supporting the project, engage with borrowers in a full and open consultation process in all four countries. The Bank's procedures require public consultations with populations likely to be affected by the project and NGOs in the countries in which the project will be sited. The Bank will ensure full disclosure of both the consultation process and the outcomes. The procedures also require public disclosure of the environmental and social documentation in each of the four countries and through the World Bank's InfoShop prior to appraisal of any project proposed for World Bank Group support.

With regard to concerns about human rights violations and communal conflicts, it is our experience that poverty reduction and sustainable development will succeed only in the presence of open and responsive systems of governance. We are therefore committed to ensuring full and open public consultations during the preparation of the projects that we support so as to ensure that they do not undermine the welfare of the affected populations.

Thus, in the event the World Bank Group becomes involved, its decision would be based on, amongst other considerations, a full environmental and social impact assessment that would have to be carried out, and an environmental and social management plan that would have to be developed through a participatory process and in accordance with the Bank's guidelines and procedures as explained above.

Sincerely,

Praful Patel
Sector Director
Finance, Private Sector & Infrastructure
Africa Region

IFESOWAPO HOST COMMUNITIES FORUM ON WEST AFRICAN GAS PIPELINE PROJECT.

Balogun Adinni Shopping Complex,
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Olorunda Local Council Development Area.
Badagry Local Government Area.
Lagos State.

Coordinator,
Environmental Rights Action/Friends of the Earth.
International Secretariat,
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P.O. Box 10577,
Benin City, Nigeria.

Attention: Isaac Osuoka

Letter of Consent.

We have received several complaints from various families and communities about the inadequacy of the compensation paid to them in respect of the land acquired by WAGPCO for the West Africa Gas Pipeline Projects.

Most of the aggrieved families felt cheated because they believe if the property were sold or leased to individuals around, they must have realized far and above what was paid by WAGPCO to them. The payments made fell short of the market value expected from the property.

Some of the families have given us written consent to complain as evident in the attached letters, while many gave oral consent for us to complain on their behalf.

We, at the last meeting held at PMC Hotel, Ota Ogun State, Nigeria resolved to give you this letter of authority to serve as consent to complain on behalf of the various families to the World Bank in order to seek redress and obtain the market value of the property concerned.

Thank for your co-operation.

Alhaji (Hon) Alani Z. Ajose.
Chairman

Hon. Isola Hassan.
Secretary.

NAME	COMMUNITY
1 Kunle Agboola	ota community
2 Taju Bakare	" "
3 Alh Alani Ajose	Ibogbo Eremi
(4) Alh Ishola Hassan	Imeke Community
(5) Alex Kunnuji (JP)	Ajido "
(6) Femi Obanla	Igbese community
(7) Aliu Summons	Oke-Omi "
(8) Wahab Summons	" "
(9) Taiwo Summons	" "
(10) Rasaki Olumuo	" "
(11) Murtala G. Meron	Ajido Community
12) Solomon ALIVA	" "
(13) ADAMU KABIRU	IGBESA community
(14) Chief Saheed Ogia	OTA Community
(15) Akinboyede Olasunkanmi	
(16) Hassan Y. Oluwatoyin	Imeke Community.
17 ABEGUNDE ABEGBOTE	Europe Com. OTA
(18) TAOREED ORE OBA	OTA com.
19 Kolawole Kasim	Oke Omi
20 Igudeen Ibrahim	Elerinla ofi
21 TAOFEEK AINA	ILISA EGUSHI COM OTA
22 Chief IDOWU FASHOGBON	" " " "
23 SULOLA ADAMU	IGBOGBI OTA community
24 RASAKI SAEED	OTA
25 ADESEYE ADEYEMI	OTA
26 BOWY MUSEEB	OTA

	NAMES	COMMUNITY
27	Taiwo Bamgbola	OTA
28	Toubeeb Safari	Igbesa
29	DADA KASALI OLUSEGUN	Igbesa
30	AKINPELU JACOB TAIWO	~~Igbesa~~ OTA

NAME	COMMUNITY	SIGNATURE
1, Tijudeen Ibrahim	Ebrinka Ota	
2 Kolejaye Wasiu	Oko Oniu Ota	
3 Adegemi Adegbite	Europe Com. Ota	
4. Taofeek Oreoba	Ota	
5 Taofeek Aina	Ilisa Egushi Com Ota	
6 Sulola Ajani	Ota Ikorodu	
7 Rasaki Saheed	Ota	
8 Adesoye Adeyemi	Ota	
9 chief Idowu Fashoyosun	Ilisa Egushi Com Ota	
10 Taheeb Safari	Igbesa	
11 Taiwo Bamgbola	Ota	
12 Idowu Mujeeb	Ota Atiwowo	
13 Akinpelu Jacob Taiwo	Ota Itori	
14. Dada Kasali Seyi	Igbesa	