



Independent Monitoring of the Ogoniland Clean-up: Biannual Progress Report

January-June 2021





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SDN supports those affected by the extractives industry and weak governance. We work with communities and engage with governments, companies and other stakeholders to ensure the promotion and protection of human rights, including the right to a healthy environment. Our work currently focuses on the Niger Delta.

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List of Abbreviations

BoT - Board of Trustees

BTEX - Benzene Toluene, Ethylbenzene and Xylene

CCP - Community Contact Person

CDC – Community Development Committee

CEER - Centre for Excellence in Environmental Restoration

CEHRD - Centre for Environment, Human Rights and Development

CRAC - Central Representative Advisory Committee

CSO - Civil Society Organisation

FGD - Focus Group Discussion

FGN – Federal Government of Nigeria

GBP£ - Great British Pound, exchange rate used is £1:N700

GC - Governing Council

HYPREP - Hydrocarbon Pollution Remediation Project

ICSMC - Integrated Contaminated Soil management Centre

KPI - Key Performance Indicators

NGN₦ – Nigerian Naira

NOSDRA - National Oil Spill Detection and Response Agency

SDN - Stakeholder Democracy Network

TPH - Total Petroleum Hydrocarbon

UNEP - United Nations Environment Programme

UNITAR - United Nations Institute for Training and Research

USD – United States Dollars

WHO – World Health Organisation

Executive Summary

Key messages on progress of the Ogoniland clean-up to date

- About a quarter of clean-up lots handed over to contractors to remediate oil pollution at ‘simple’ sites have been government-certified as complete (13 out of 50). We took samples at six of these lots; contaminants had been reduced to below target levels at four lots, but we found contaminants above target levels at two lots, indicating remedial action is still required.
- The bidding process for ‘complex’ sites has started, but clean-up activities are yet to commence. In addition, work has not commenced to set up an Integrated Contaminated Soil Management Centre, which will be a prerequisite to enable proper clean-up of complex sites.
- While contractors are now in place to deliver clean drinking water infrastructure, ‘on-the-ground’ activities have not started. Community health registries to understand and respond to the effects of oil pollution are not yet in place. These were prescribed by UNEP as emergency measures in 2011.
- Over 1,000 members of affected communities have been employed by contractors to participate in clean-up activities, although only 6% are female. A further 400 women have received targeted livelihood support, however, concerns have been raised over gaps in this support.
- Levels of community satisfaction with HYPREP and clean-up contractors are mixed. In some areas levels of satisfaction are very high, but in others they are very low. Dissatisfaction in communities tends to relate to the poor quality of opportunities offered by the clean-up (e.g. low pay in clean-up jobs), and management of complaints and potential conflict arising from the clean-up.

Overview and background to the Independent Civil Society Monitoring of the Ogoniland Clean-up project

In 2020, Stakeholder Democracy Network (SDN) and Centre for Environment, Human Rights and Development (CEHRD) commenced the Independent Civil Society Monitoring of the Ogoniland Clean-up project with support from the Netherlands Ministry of Foreign Affairs, and working in partnership with a range of civil society organisations and activists in the region. Via a network of trained monitors from civil society, we are regularly gathering a range of data to track the progress of a large-scale oil pollution clean-up in Ogoniland, Rivers State, Nigeria, conducted by a project of the Ministry of Environment: the Hydrocarbon Pollution Remediation Project (HYPREP). Our project will run from 2020 to the end of 2024.

The scale of this clean-up – which UNEP estimated would cost USD\$1 billion in 2011 – is unprecedented in Nigeria. Getting it right is critical for the people of Ogoniland, who have suffered the effects of oil spill pollution for decades, including poor health and loss of livelihoods. But its success would also hold wider significance for the Niger Delta region, where there are many other locations where decades-old oil spill pollution has not been cleaned up adequately.

Actual remediation activities finally commenced in January 2019 with the award of contracts to the first batch of contractors. However, the clean-up has faced many challenges, and so the intention of this independent monitoring initiative is to provide systematic data on the progress of the clean-up, increase transparency of

clean-up activities, and support improved engagement between civil society and HYPREP to ensure the Ogoniland clean-up is implemented to a high standard. Ultimately, what we want – and demand – to see, is an Ogoniland where oil spill pollution has been completely removed and the environment restored, so that its citizens can finally start to recover what they have lost from decades of oil spill pollution.

HYPREP has agreed to collaborate with this project, and we welcome and strongly encourage efforts to improve both the transparency and implementation of the clean-up. This is the first biannual report, summarising data from January to June 2021. We will be producing biannual reports until at least the end of 2024 (when current funding for this project is due to end). Data collected as part of this project is updated quarterly on our [website](#), with some key data displayed on our [dashboard](#), where the full database can also be downloaded to enable further detailed analysis.

Overall findings from January-June 2021

Oil pollution clean-up sites:

- We took 390 soil and water samples at 10 clean-up lots where contractors reported they had completed work. 5% of these samples had Total Petroleum Hydrocarbon (TPH) or Benzene, Toluene, Ethylbenzene and Xylene (BTEX) levels that exceeded the target thresholds for the clean-up, and 5 out of the 10 lots had at least one sample that exceeded target thresholds.
- Two of the five lots that exceeded target thresholds have been certified as complete (lot 6 and 20) by NOSDRA, but we are not aware of any remedial action to address the high levels of TPH and/or BTEX, and are seeking clarification on this.
- A total of 57 lots (50 remediation and 7 assessment¹) have been contracted so far. 29 lots are at various stages of remediation, 8 are claimed to be completed and awaiting certification, and 13 have been certified as completed. Because clean-up activities commenced nearly two years before our full independent monitoring activities commenced, 7 of these 13 lots had already been certified as complete, and so we unfortunately do not have data on these.
- At the time of visiting in June 2021, only 18 of the 29 lots at various stages of remediation had a contractor actively on site in the past month. One reported reason for this was the delayed release of funds from HYPREP following a change in the members of HYPREP's governance structures.
- Our observations at clean-up sites identified weaknesses in the backfilling processes used by contractors once a site has been cleaned, and the absence of sampling at biocell locations (where contaminated soil is treated), which raises the risk of sites being certified as complete when they remain contaminated.

Process of community engagement:

- Overall, there is a reasonably high level of awareness in communities about basic aspects of the clean-up. However, there is a small but significant number of communities where there is a poor understanding of what to expect. There is also a widespread misunderstanding about the role of clean-up contractors, leading to expectations which cannot be met, and which risk conflict and disruption to the clean-up process.

¹ An 'assessment lot' is a site which is being assessed to determine if clean-up is required. As such, we do not regularly collect data at these sites. If the lot is determined to require clean-up, it will become part of our regular data collection.

- The overall level of community satisfaction with HYPREP is more-or-less neutral, but again, there are some communities where levels of satisfaction are particularly low. Concerns tend to relate to the level and quality of community participation in the clean-up, handling of complaints, and conflict management.
- Of particular concern is the high level of variability in community satisfaction with the performance of clean-up contractors at individual lots. A number of contractors were scored extremely poorly on all aspects of performance asked about and urgent intervention is needed.
- While the above findings are concerning, there are also examples where satisfaction levels are very high. These cases can be used to find out what lessons can be applied to improve the situation in communities and at individual clean-up lots where there are problems.
- While complaint processes have been established in almost all communities by HYPREP and contractors, with few exceptions, they do not appear to be functional or effective.

Provision of emergency measures:

- The delivery of emergency measures remains extremely slow. Preparatory activities for water provision have at least now started, however, work is yet to commence. The health-related activities described in the original UNEP assessment are yet to commence.

Promotion of livelihoods:

- More than 1,000 temporary jobs have been created for community members as part of clean-up activities, but only 6% of these have been filled by women.
- A further 400 women have been trained as part of HYPREP's wider remit to promote economic recovery in Ogoniland. However, there are some challenges with the current approach, including trainees expressing dissatisfaction with the starter packs provided following training.

Set-up of key HYPREP infrastructure:

- HYPREP is yet to commence the construction of the Centre of Excellence for Environmental Remediation (CEER) and the Integrated Contaminated Soil Management Centre (ICSMC). As the clean-up progresses towards addressing pollution at complex sites, it is critical these are established to enable an effective clean-up, and to ensure there is a lasting legacy of improved environmental management capacity to address widespread pollution across the Niger Delta region.

Recommendations

The following recommendations for action within the next six months are made to HYPREP:

On site clean-up:

- Ensure corrective action is taken at lots 3, 6, 15, 20 and 43 which have failed to meet the thresholds for clean-up to be certified, inform us of remedial actions taken for these lots, and re-invite our monitors for a new round of sampling at the appropriate point.

- Create a suitable standard operating procedure (SOP) for the backfilling process, commence close supervision of this process to ensure uniform degradation of contaminants, and ensure sampling also takes place at biocell locations.

On community engagement:

- Learn lessons from communities where levels of awareness of the clean-up are high to establish best practice for further engagements with all communities. In particular, use this to engage in Ocale, Ueken and Botem communities, where we recorded poor levels of awareness of the activities of the clean-up.
- Learn lessons from communities where levels of satisfaction with HYPREP are higher to understand the reason for the differences and to establish best practice for further engagements with communities. This includes in Kpean, Botem, K.Dere, and Ueken communities, where we recorded low levels of satisfaction with HYPREP.
- More broadly, an Ogoni-wide exercise is needed to re-engage with all communities to clarify the roles and responsibilities of contractors to ensure there are not unrealistic expectations of what direct benefits contractors may confer to community members, while also ensuring communities can hold contractors to account for the role they should be fulfilling.
- Call meetings between the communities and contractors for lots 11, 12, 15, 17, 26, 30, 32, 44, 45, 46, 49, 50, 56 and 57, to understand the reason for high levels of dissatisfaction with contractor performance and to put in place plans to address these.
- Provide refresher training for Central Representative and Advisory Committee (CRAC) members on their roles and responsibilities and put in place a clear process for documenting and following up on/resolving complaints.

On emergency measures:

- Urgently commence planning for the creation of health registries for every target community, which are a prerequisite to further health interventions.
- Publish a timeframe for commencement and completion of potable water projects.
- Ensure that all contaminated sources of water (drinking, fishing and swimming) are properly signposted, an inventory of these locations produced and published, and remediated to protect the health and lives of Ogoni people.

On livelihoods:

- Set a quota for female participation in clean-up activities of 50%, and work with community leadership to implement this.
- Re-evaluate the design of the wider livelihoods programme. The current approach is focussed on training and start-up kits, which are high-cost and low-reach, and appear to be inadequate from the perspective of participants. A more holistic, market-based approach would be a more effective use of HYPREP's resources, and more likely to result in sustained, wide-reaching economic opportunities for people living in Ogoniland.

On key infrastructure:

- Urgently commence planning for the creation of the Integrated Contaminated Soil Management Centre, make public a timetable for its completion, and ensure this is in place prior to the commencement of clean-up at complex sites.
- Make public a timetable for the launch of the Centre of Excellence for Environmental Restoration.

Audience for this report and how you can help

Our biannual reports are written with a wide audience in mind, including: HYPREP staff, management and members of the Governing Council and Board of Trustees; citizens of Ogoniland; civil society; the media; wider stakeholders in relevant federal government ministries, departments and agencies, such as the National Oil Spill Detection and Response Agency (NOSDRA); and political representatives.

We aim to keep this report accessible for all, while also providing a level of detail necessary for HYPREP to be able to take action on specific problems. We will continue to learn and to try to make our data and analysis as accessible, relevant and useful as possible. Therefore, we welcome your feedback, questions and suggestions, which can be sent to: info@stakeholderdemocracy.org. Equally, while we have taken every effort to ensure the accuracy of our data and the integrity of the monitoring database, if you have any concerns about the data, please do bring these to our attention.

1. Introduction

This is the first bi-annual monitoring report of the Independent Civil Society Monitoring of the Ogoniland Clean-up project. It presents data collected from January-June 2021 by a network of trained civil society representatives who act as the project monitors. Further background on oil pollution in Ogoniland and this project are provided in this introduction, while the remainder of the report is structured as follows:

Overview of our independent monitoring process and methods: an overview of the data we are collecting and how, and a full list of the indicators used.

Overall progress: summary of clean-up status since inception: providing data on overall progress of the clean-up. As this is our first annual report, much of the information contained here is similar to that collected for January-June 2021. However, in future reports, this section will begin to provide a useful view of overall progress, versus specific progress for the six-month period the report relates to.

January-June 2021: summary of clean-up progress and monitoring data for the six-month monitoring period: providing an overview of data and progress against each indicator for the specified six-month period.

Detailed analysis of data collected January-June 2021: a more detailed breakdown and analysis of data for the specific six-month period grouped under the following activity areas: 1) site clean-up, 2) community engagement, 3) emergency measures, 4) livelihoods, and 5) HYPREP Infrastructure. Note that even this more detailed analysis heavily summarises the data available, and therefore anyone wanting to analyse the data in further detail can do so by downloading the latest available dataset on our website. We welcome and encourage others to make use of this data.

Discussion, conclusions and recommendations: a final summary of the findings under each of the five areas above and our recommendations to HYPREP for action in the next six months.

Overview of the Ogoniland clean-up

Ogoniland in Rivers State is one of the most polluted areas in the Niger Delta region of Nigeria, following decades of oil and gas exploration and production by the Shell Petroleum Development Company (SPDC) joint venture, widespread oil spills, and ineffective clean-up of this pollution. In 2006, the Federal Government of Nigeria (FGN) invited the United Nations Environment Programme (UNEP) to carry out an environmental assessment of the area. UNEP's [Environmental Assessment of Ogoniland report](#), published in 2011, documented widespread oil spills, the associated pollution, and called for the urgent clean-up of the area, as well as the implementation of emergency measures, such as the provision of potable drinking water, health interventions in impacted communities, and the restoration of livelihoods.

To address these issues, the Hydrocarbon Pollution Remediation Project (HYPREP) was established in 2016² by the FGN, with a two-fold mandate: environmental remediation and provision of alternate and sustainable livelihoods. HYPREP's activities are to be funded by the SPDC joint venture partners. HYPREP is a project under the Federal Ministry of Environment, with its own three-tier governance structure. These are the Governing

² Note that an earlier version of HYPREP was also established in 2012, but this is different to the present HYPREP established in 2016.

Council, which provides policy guidance on the function of HYPREP; the Board of Trustees, which is responsible for financial oversight and disbursement of funds for the approved projects; and the Project Coordination Office which is responsible for the execution of HYPREP's operations.

It was expected that cleaning up historic oil spill pollution would be a five-year process, and the total restoration of the environment would take over 30 years. To achieve this, HYPREP's work is split into two phases; simple sites and complex sites, with HYPREP starting off with the simple sites. This first phase is divided into batch one made up of 21 lots, and batch two made up of 36 (7 of which are assessment lots). All 57 lots have all been handed over to various contractors. The second phase for clean-up of complex sites is yet to commence, but the tender for contractors has been issued.

During more than two years of implementation of remediation, progress has been slow, exacerbating the frustration among members of impacted communities. There have been serious concerns raised about the project, particularly relating to transparency and accountability, procurement processes and the quality of remediation techniques proposed and undertaken³.

The impact of oil pollution and the importance of clean-up

People living in Ogoniland have now suffered the impacts of oil spill pollution for decades. Directly, this includes health impacts and loss of livelihoods (e.g. through the contamination of farms and fisheries), plus many secondary impacts related to these, including high levels of insecurity and exposure to other environmental risks, for example due to the loss of mangroves. The consequences of oil spills can be dire. For example, one study indicates that infant mortality rates double for children whose mothers lived near an oil spill prior to conception⁴.

A successful clean-up in Ogoniland is not just a matter of importance to Ogoniland. There are many other areas across the Niger Delta affected by decades of oil spill pollution – a proper clean-up in Ogoniland would provide a template for clean-up across the Niger Delta, and build institutional experience to aid replication.

The Independent Civil Society Monitoring of the Ogoniland Clean-up project

In 2020, Stakeholder Democracy Network (SDN) and Centre for Environment, Human Rights and Development (CEHRD) commenced the Independent Civil Society Monitoring of the Ogoniland Clean-up project with support from the Netherlands Ministry of Foreign Affairs.

The project has three main elements:

1. On a regular basis, a small team from SDN and CEHRD, alongside 31 members of civil society trained to be monitors under the project, visit project sites to collect a range of data, from soil and water samples, through to community perceptions on how HYPREP and clean-up contractors are performing.

³ See, for example: <https://www.premiumtimesng.com/news/headlines/365245-investigation-nigerian-government-awarded-n690m-ogoni-cleanup-contracts-to-unqualified-firms.html>; and HYPREP's response: <https://hyprep.gov.ng/response-to-premium-times-publication/>

⁴ Bruederle, Anna & Hodler, Roland. (2019), Effect of oil spills on infant mortality in Nigeria.

2. Data collected by monitors is updated quarterly on our [website](#), with some key data displayed on our [dashboard](#), and a link to where the full database can be downloaded to enable further detailed analysis. A bi-annual report, like this one, is also produced with analysis of this data.
3. Regular engagements with HYPREP and other stakeholders in the Ogoniland clean-up are conducted to discuss progress based on our independent data, to call for corrective action where there are problems, and to identify and encourage best practice where it exists.

The project has several objectives. First and foremost, we want to use our independent monitoring and reporting to engage with HYPREP, to highlight where there is both good and bad progress, and to agree what actions can be taken to improve the clean-up. HYPREP has agreed to collaborate with this project, and we welcome and strongly encourage efforts to improve both the transparency and implementation of the clean-up. Second, this monitoring initiative will provide easy access to an important and independent source of data on the clean-up, enabling citizens, civil society and the media to have an improved, more holistic understanding, and supporting them in their efforts to ensure Ogoniland finally sees a proper clean-up. Ultimately, what we want – and demand – to see, is an Ogoniland where oil spill pollution has been completely removed and the environment restored, so that its citizens can finally start to recover what they have lost from decades of oil spill pollution.

SDN and CEHRD's offices are based in Port Harcourt, Rivers State, which neighbours Ogoniland. Some of our colleagues are from Ogoniland, and most of the project-trained monitors come from, or reside in, Ogoniland. Therefore, this is a locally-driven initiative, and one in which we wish to not only document the facts, but also elevate the perspectives and experience of those living in Ogoniland, who face the impacts of oil spills and the delayed clean-up on a daily basis.

Due to Covid-19 restrictions and delays, initial monitoring visits commenced at the end of 2020, and full data collection commenced in 2021. This is the first biannual report, summarising data from January to June 2021. We will be producing biannual reports until at least the end of 2024 (when current funding for this project is due to end).

2. Overview of our independent monitoring process and methods

The project is led by the Port Harcourt-based civil society organisations, SDN and CEHRD, working in close collaboration with National Coalition on Gas Flaring and Oil Spills in the Niger Delta (NACGOND), Kabetchace Women Resource and Development Centre, the Youth Advocacy and Environment Centre (YAEC), Gender and Development Action (GADA), Society for Women and Youth Advocacy (SWAYA), Lokiaka Women Centre and trained Local Environment Monitors across Ogoni communities. At present, a total of 31 monitors from civil society have been trained to support us in this monitoring exercise.

We have established 16 Key Performance Indicators (KPIs) listed in the table at the end of this section, which we will monitor throughout the project. The design of our KPIs was based on HYPREP's ten KPIs (see the annexes). Almost all of our KPIs are informed by our own primary data collection. However, it is important to note that a small number capture data as reported by HYPREP (e.g. indicator 2) and contractors, and we have been explicit where this is the case. We have done this where it is beyond our means to produce independent data (e.g. to measure volumes of soil remediated), but we feel it is still important to report this information, to provide easy access to this data. Further detail on the indicators (such as the specific method for data collection for each indicator) can be viewed by downloading the database on the [dashboard page](#), and accessing the "database indicators" worksheet.

These indicators are monitored using a range of methods, including laboratory analysis of soil and water samples collected from remediation sites; site observation visits; visits to HYPREP's offices; Focus Group Discussions (FGDs) with the leadership in communities, including women and youth groups; and public perception surveys conducted with over 1,400 respondents. Our Monitors were previously trained by UNEP on contaminated site assessment techniques, and observed stringent quality assurance and quality control protocols while collecting the same soil and water samples with the joint team. Samples from clean-up lots are collected after a contractor informs HYPREP they have concluded clean-up activities – this exercise should be repeated at individual lots if laboratory analysis indicates target thresholds have not been reached, as the contractor should be instructed by HYPREP to return to site to take corrective action. All other indicators are collected on a quarterly basis.

To understand our data, it is useful to note we have two different ways of categorising our indicators. First, in the database, we have structured the data according to whether the indicator is tracking progress at the level of a lot, a community, or for HYPREP as a whole:

1. Lot: these are indicators that measure progress and perspectives at a specific site where a company has been contracted to conduct clean-up and remediation of oil pollution. For example, this includes data from soil and water samples taken at a clean-up site (lot), as well as community perspectives on how the contractor is performing.
2. Community: these are indicators that measure progress and perspectives for aspects of the clean-up which relate to a whole community. For example, whether clean drinking water sources have been installed, or how the community feels about the performance of HYPREP overall.

3. HYPREP: these are indicators which measure progress on initiatives which relate to the “whole project” for the Ogoniland clean-up. For example, this includes the infrastructure that needs to be established for the whole project to succeed, such as a Centre of Excellence for Environmental Restoration, and the number of people subsequently trained at this centre.

In our analysis in this report, however, we have broken down our indicators according to different sets of activities/processes under the clean-up. As already described, these are: 1) the actual process of clean-up at lots, 2) the process of community engagement, 3) the provision of emergency measures, 4) livelihood support, and 5) the set-up of critical HYPREP infrastructure to enable the clean-up.

This is a complex and large-scale clean-up. We cannot monitor every single aspect of it, but our indicators have been selected to provide data on a range of some of the most important aspects, to enable a balanced and broad assessment of the clean-up project.

Table 1: Key Performance Indicators use by the Independent Civil Society Monitoring of the Ogoniland Clean-up project

Indicator	Description
1. Level of Total Petroleum Hydrocarbons (TPH) and benzene, toluene, ethylbenzene and xylene (BTEX) at individual clean-up sites, disaggregated by soil, surface water, ground water and sediment samples	A measure of the concentration of TPH and BTEX in soil, which is the main indicator of whether hydrocarbon pollution has been removed to a sufficient level HYPREP has set targets for TPH in soil of 1,000 milligrams/kilogram (mg/kg) for inhabited locations and 3,000 mg/kg for uninhabited locations, and 600 micrograms/litre (µg/l) for water. For BTEX, 0.05mg/kg for soil, and 0.2 µg/l for water samples.
2. Reported volume of soil remediated at individual clean-up sites to date	This figure comes from HYPREP and contractor-reported figures and reports the total volume of soil remediated at a site to date
3. Has the site clean-up been certified as complete by NOSDRA?	"yes/no" depending on whether certification has been received. This is a certification given to HYPREP by NOSDRA, (the National Oil Spill Detection and Response Agency) based on lab analysis conducted by NOSDRA. This means the Federal Government has formally approved completion of clean-up at this lot. Note that this is not an endorsement by our project, but data on the government’s own certification process.
4. Has the contractor been present and active on the clean-up site in the past month?	“yes/no” based on visual check, or “n/a” when clean-up complete or not yet due to start. If “no”, a reason should be noted. Note that this is collected during quarterly visits, with monitors assessing if there has been activity within the past month.
5. Clean-up stage at individual clean-up site	Note of the stage of the clean-up at a site, based on the HYPREP milestones: <ul style="list-style-type: none"> - Not yet assigned to a contractor - Handover of site to contractor -Site set up -Construction of bio-cell -Soil excavation -Soil treatment and remediation -Inspection and certification -Demobilise from site -Site handover to HYPREP/Community If any issue identified at each stage (as per checklists – see database) this is noted

<p>6. Level of community awareness of basic clean-up information, measured as % of community survey respondents that are aware of at least 3 out of the 4 survey items of basic information about clean-up</p>	<p>"yes" or "no" answers, based on survey responses to the following:</p> <ul style="list-style-type: none"> - I am aware the contractor(s) were introduced and formally handed over to my community - We have been informed of the number of clean-up lots in my community - We have been informed that the contractor(s) will be employing some persons from my community - We have been informed that the contractor(s) will compensate landowners for access to lot
<p>7a. Average community satisfaction score with clean-up site</p>	<p>A composite indicator, where a series of Focus Group Discussion questions are rated 1-5 (1 = completely disagree, 5 = completely agree):</p> <ul style="list-style-type: none"> - I feel well informed about the clean-up process in my community by [CONTRACTOR] - I feel the community has been sufficiently consulted on community worker selection, access to site and waste management by [CONTRACTOR] - I feel sufficient opportunities have been given to local community members to participate in the clean-up by [CONTRACTOR] - There is a clear mechanism to report concerns to [CONTRACTOR] - The way and manner [CONTRACTOR] has acted has minimised the potential for conflict in my community <p>Participant scores are averaged for a lot to provide an overall perception index between 1-5.</p>
<p>7b. Average community satisfaction score with overall HYPREP clean-up</p>	<p>A composite indicator, where a series of survey questions are rated 1-5 (1 = completely disagree, 5 = completely agree):</p> <ul style="list-style-type: none"> - I feel well informed about the clean-up process in my community by HYPREP - I feel the community has been sufficiently consulted about the remediation in our community by HYPREP - I feel sufficient opportunities have been given to local community members to participate in the clean-up by HYPREP - There is a clear mechanism to report concerns to HYPREP - The way HYPREP has acted has minimised the potential for conflict in my community <p>These scores are averaged across participants from individual communities to provide an overall perception index between 1-5.</p>
<p>8a. Existence of dispute and community engagement mechanism created by the contractor and effective management of complaints</p>	<p>"Yes/no" response on check of whether the contractor has set up a complaint/feedback mechanism with the community, using the HYPREP issued 'Guidelines and Rules for Conflict Resolution, Community Engagement and Contract Administration' document.</p> <p>Also "Yes/no" response by key community members on how effective the complaint mechanism has been, followed with a comment.</p>
<p>8b. Existence of dispute and community engagement mechanism created by HYPREP and effective management of complaints</p>	<p>"Yes/no" response on check of whether HYPREP has set up Central Representative Advisory Council (CRAC) to deal with community issues.</p> <p>Also "Yes/no" response on by key community members on how effective CRAC is in resolving complaint. Followed with a comment.</p>
<p>9a. % of contaminated water sources clearly marked with signposts</p>	<p>Total number of contaminated water sources in the community against number of sources that are clearly marked.</p>
<p>9b. Community access to HYPREP's potable water schemes</p>	<p>This is specifically for communities where emergency water measures were proposed. To be recorded as:</p> <ul style="list-style-type: none"> -HYPREP has not yet started improved water provision -HYPREP is constructing an improved water source -HYPREP has installed an improved water source but it is insufficient for community needs -HYPREP has installed an improved water source and it is sufficient for community needs -HYPREP has installed an improved water source but it is not functioning

10. Health registry established in community	Has HYPREP completed a comprehensive health registry for all those living in the community? Status to be noted as "Not Started", "In Progress", or "Completed".
11. Reported total number of people employed to date from local community in clean-up work (disaggregated by sex and age)	Count of those employed during the lifetime of a site clean-up. This is regularly updated, but is the total people employed up to that date. Note that this is cumulative. This figure comes from contractor and community records.
12. Reported number of individuals that have completed livelihood training, received grants, or scholarships provided by HYPREP (disaggregated by sex and age) in the past quarter	Count of those who, in the past quarter, have successfully completed training, received a grant or scholarship, broken down by support type, based on livelihood needs assessment. This figure comes from HYPREP records.
13. Existence of Centre of Excellence for Environmental Restoration	Status to be updated: "not started/under development/completed but not operational/completed and operational"
14. Reported number of people successfully trained at Centre of Excellence for Environmental Restoration (disaggregated by sex and age) in the past quarter	Count of those who have graduated from their training course in the past quarter. This figure comes from HYPREP records.
15. Existence of Integrated Contaminated Soil Management Centre	Status to be updated: "not started/under development/operational"
16. Reported tonnes of soil remediated by Integrated Contaminated Soil Management Centre in the past quarter	As per indicator. This figure comes from HYPREP records.

3. Overall progress: summary of clean-up status since inception

While the main purpose of this report is to provide data and analysis for the period January-June 2021, it is also critical to understand the overall progress of the clean-up since its inception. This section provides a short overview of progress and summary of key data to help gain a holistic understanding of clean-up progress and challenges.

Table 2: Summary of overall status of the Ogoniland clean-up against key performance areas.

Months since clean-up commenced	30 months since the first contractor was deployed to site in January 2019.
Status of clean-up sites ('lots')	<p>HYPREP is currently undertaking clean-up at 'simple' sites, before commencing work at 'complex' sites. We do not currently have a start date or number of lots planned for the complex site clean-up. Of the simple sites, 57 lots have been designated and assigned to contractors. Of these:</p> <ul style="list-style-type: none"> • 37 lots have active clean-up processes, including 7 where contractors report they have completed work and are awaiting inspection and certification. • 13 sites have been certified as complete by NODSRA. Of these: <ul style="list-style-type: none"> ○ We were unable to assess progress at 7 as they were completed before this project commenced ○ Our sampling at 4 of the remaining 6 lots returned no samples with TPH or BTEX concentrations above thresholds (lots 1, 7, 14 and 19) ○ At 2 lots (lots 6 and 20), we found at least one sample where TPH and/or BTEX was above thresholds, indicating that clean-up at these sites does not yet meet the appropriate standards • 7 are assessment sites, where it is yet to be determined if a clean-up is required
Status of 'emergency' measures (water provision and health assessments)	While preparatory activities are underway for water provision, at present, no communities have benefitted from the provision of new, potable water sources. A health registry exercise (a pre-requisite to other health activities) is also yet to commence in any community.
Number of community members employed in clean-up activities	1,057 individuals are employed in clean-up activities, with 67 (6%) females. Note that we do not have data for the seven lots that were completed prior this independent monitoring project starting, nor for sites where contractors were not present during our first set of monitoring visits. This number is therefore likely to rise in future reports covering these same lots.
Number of community members that have benefited from livelihood support	400 women have been trained.
Existence of Centre of Excellence for Environmental Restoration	Not yet established.
Existence of Integrated Contaminated Soil Management Centre	Not yet established.
Reported tonnes of soil remediated by Integrated Contaminated Soil Management Centre in the past quarter	0 - Not yet established.

4. Progress during January-June 2021: summary of data for this six-month monitoring period

The below table provides a summary of indicator data for our 16 KPIs on the Ogoniland clean-up for the six-month period ending June 2021.

Table 3: Summary of findings from our independent monitoring of the Ogoniland clean-up for January-June 2021.

Indicator	Summary of data/findings
1. Level of TPH and BTEX at individual lots, disaggregated by soil, surface water, ground water and sediment samples	50% of lots had at least one sample which exceeded thresholds, where samples were taken (Nov 20-Jun 21) after a contractor reported completion of clean-up. A total of 10 lots were assessed during this period.
2. Reported volume of soil remediated at individual sites (lots)	476,500 cubic metres (completed and certified lots)
3. Has the site clean-up been certified as complete by NOSDRA?	During the reporting period, six lots were certified as complete. However, at two of these lots, our sampling found locations where TPH and/or BTEX thresholds for clean-up certification were exceeded.
4. Has the contractor been present and active on site in the past month?	In June, we observed active contractors at only 62% of sites (18 out of 29) where a contractor is expected to be actively undertaking clean-up during the month of June.
5. Clean-up stage at individual clean-up site	In June, the status of clean-up progress at the current 50 clean-up lots was as follows: Handover to contractor = 2 lots (4%) Setup of site = 2 lots (4%) Bio-cell construction = 4 lots (8%) Soil excavation = 8 lots (16%) Soil treatment and remediation = 14 lots (28%) Demobilisation = 0 (0%) Inspection and Certification = 7 lots (14%) Closed out handed to HYPREP = 13 lots (26%)
6. Level of community awareness of basic clean-up information, measured as % of community survey respondents that are aware of at least three out of the four survey items of basic information about clean-up	In June, 76% of 1,400 survey respondents answered yes to at least three out of four survey questions.
7a. Average community satisfaction score with clean-up site (NB: 1 = very low levels of satisfaction, and 5 = very high levels of satisfaction)	Overall score = 3.3/5.0
7b. Average community satisfaction score with overall HYPREP clean-up (NB: 1 = very low levels of satisfaction, and 5 = very high levels of satisfaction)	Overall score = 3.1/5.0
8a. Existence of dispute and community engagement mechanism created by the	Complaint mechanisms have been established at 94% of clean-up lots (sites), however, at 40% of these communities felt none of their

contractor and effective management of complaints	complaints had been resolved, and only partially resolved at a further 18% of lots.
8b. Existence of dispute and community engagement mechanism created by the HYPREP and number of issues raised and resolve in past quarter	The HYPREP-level complaint management process, managed by the Central Representative and Advisory Committee (CRAC), has been established in 100% of communities. However, there is limited knowledge about this structure and how to raise complaints.
9. Are all contaminated water sources clearly marked with sign posts?	Data is not yet available. The inscriptions on the sign posts warning people not to use contaminated water are no longer legible or no longer in place, but we have not yet gained access to data on the locations of contaminated water sources to be able to systematically monitor this.
10a. Community access to HYPREP's potable water schemes	No communities gained access to potable water during the monitoring period. However, there was introduction of contractors to communities, and visits to communities by contractors.
10b. Health registry established in community	No communities have had a health registry established.
11. Total number of people employed to date from local community in clean up (disaggregated by sex)	1,057 (6% female = 67)
12. Number of individuals that have completed livelihood training, received grants, or scholarships provided by HYPREP (disaggregated by sex) in the past quarter	During this six-month period, no new individuals benefited from the livelihoods programme.
13. Existence of Centre of Excellence for Environmental Restoration	Not yet established
14. Number of people successfully trained at CEER (disaggregated by sex and age) in the past quarter	0
15. Existence of Integrated Contaminated Soil Management Centre (ICSMC)	Not yet established
16. Tonnes of soil remediated ay soil management centre in the past quarter	0

5. Detailed analysis of data collected January-June 2021

This section of the report presents the data collected by our monitors between January and June, 2021. This data is from laboratory analysis, observations of contractor's work at the respective lots by community based monitors, public perception surveys, and FGDs conducted in impacted communities, and HYPREP data.

To help structure our data and analysis, we have grouped our KPIs into five areas, which align with the core mandate of HYPREP:

1. Site clean-up: data related to the actual clean-up process being carried out at lots, such as site sample data, and the stage of clean-up at each lot.
2. Community engagement: data related to the process of engaging communities, such as the reported quality of communication, consultation, and levels of satisfaction in communities.
3. Emergency measures: data related to the implementation of water provision and health assessments as recommended in the UNEP Environmental Assessment of Ogoniland report.
4. Livelihoods: data related to efforts to support the restoration of livelihoods as part of the clean-up process.
5. HYPREP Infrastructure: data related to some of the initiatives which are expected to provide key infrastructure to enable the clean-up to take place and build the capacity for clean-up of legacy oil spill pollution across the Niger Delta.

5.1. Site clean-up

Sample data

Our monitors jointly visited 10 lots⁵ with NOSDRA, HYPREP and the Rivers State Ministry of Environment for the purpose of soil and water sample collection, and independently analysed these samples at BGI and TPI, two reputable laboratories in Port Harcourt for TPH and BTEX. As noted previously, because our monitoring visits started nearly two years after remediation commenced, we have been unable to assess clean-up at seven sites that were already certified. However, the first batch of lots assessed by this project are noted in table 4.

HYPREP and NOSDRA have agreed to a close-out contaminant level of 1000mg/kg of TPH for soil for areas close to farms and human habitation while 3,000mg/kg of TPH for soil for areas far from farms and human habitation, and 600µg/l for water. While for BTEX, the threshold is 0.05mg/kg for soil and 0.2µg/l for water. The analysed results are summarised in Figure 1 and Table 5 below.

⁵ Note that Covid-19 related delays in rolling out the full monitoring programme mean that we have included sample data for lots 1, 6 and 7, which were taken in November 2020 (i.e. outside of the January-June 2021 report timeframe) in this first bi-annual report.

Table 4: Lots where soil and water samples were taken for the period November 2020-June 2021

Lots	Community	LGA
1	Alode	Eleme
3	Alode	Eleme
6	Alode	Eleme
7	Alode	Eleme
14	Mogho	Gokana
15	Kpean	Khana
19	Korokoro	Tai
20	Korokoro	Tai
21	Korokoro/Ueken	Tai
43	Ngofa-Aleto	Eleme

Figure 1: Total soil and water samples and number exceeding target thresholds for TPH or BTEX, by lot

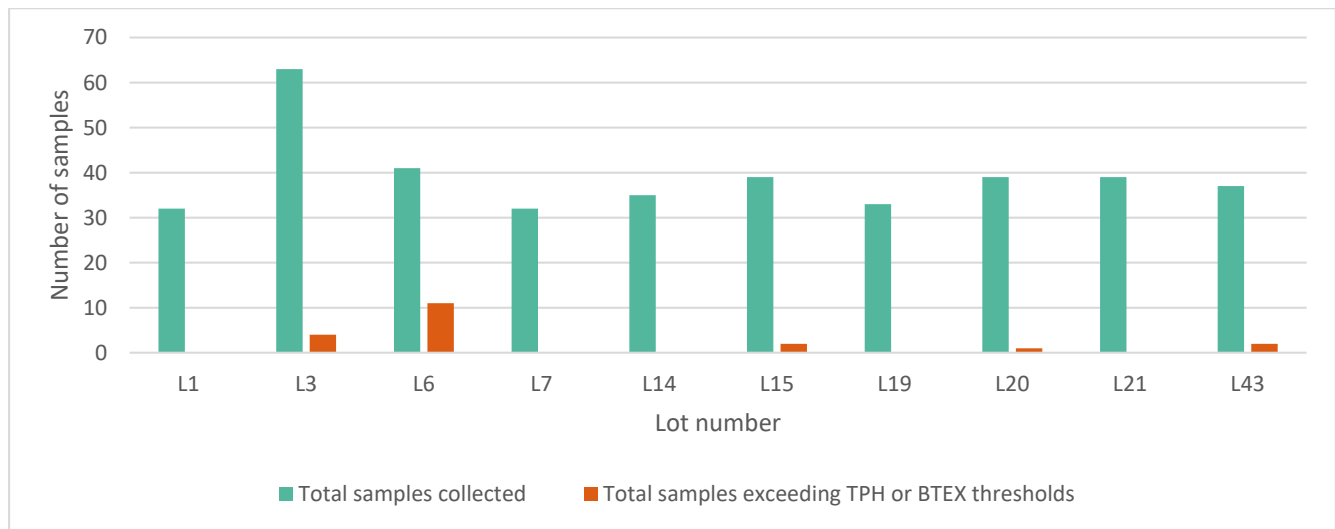


Table 5: Breakdown of sample data by lot (red highlights indicate concentration above target thresholds)

Lot where sample was collected	# soil samples collected	# water samples collected	# samples exceeding both TPH and BTEX thresholds	# samples exceeding TPH thresholds only	# samples exceeding BTEX thresholds only	Max TPH mg/kg (soil)	Max BTEX (water) ug/l	Max BTEX (soil) mg/kg	Max TPH (water) ug/l
1	32	0	0	0	0	272	N/A ⁶	N/A	N/A
3	60	3	3	1	0	5,811	<0.001	0.41	N/A
6	41	0	1	1	9	3,213	N/A	3.74	N/A
7	28	4	0	0	0	739	<0.001	0	35
14	33	2	0	0	0	547	<0.001	0	16
15	36	3	0	2	0	1,149	<0.001	<0.001	33
19	30	3	0	0	0	127	<0.001	0	23
20	36	3	0	1	0	1,104	<0.001	0	26
21	38	1	0	0	0	543	N/A	<0.001	N/A
43	34	3	0	2	0	1,843	<0.001	0.04	N/A
Totals	368	22	4	7	9				

⁶ 'N/A' indicates no sample of this type was taken.

As at June 2021, when the first stakeholder meeting to discuss these results were held, HYPREP reported that NOSDRA had certified 13 lots (1, 2, 4, 5, 6, 7, 8, 10, 14, 17, 18, 19 and 20), out of which our monitors were able to monitor 6 lots (1, 6, 7, 14, 19 and 20). Samples from lots 3, 15, 21 and 43 were also collected by NOSDRA and the SDN led team in June. However, while NOSDRA had commenced the closeout and certification process for these lots, the Agency was yet to certify and close out these lots at the date of this report. Based on the result of our analysis, some sample points in lots 3, 15 and 43 have contaminants above the threshold, it is expected that NOSDRA will recommend corrective action for the affected lots. Correcting and reducing the level of contaminant to the acceptable limits is necessary, otherwise it poses a risk to the wellbeing of those nearby.

Of the 390 samples collected, 95% did not contain TPH or BTEX concentrations above target thresholds for the clean-up, which is positive. However, 5% of samples did exceed thresholds, which represents a significant number of locations where clean-up activities do not appear to have brought down oil spill contamination to satisfactory levels. It is worth noting that the contracts for these lots do not cover underground water, however, monitoring wells were set up at each lot to monitor migration of contaminants to underground water. Fortunately, all water samples collected and analysed from these wells, as shown in Table 5, are below the thresholds.

Note also that there are some potential limitations to our sampling and analysis approach. First, we are yet to commence a quality assurance process for laboratory analysis of our samples. Except for a small batch of samples in November 2020, we have used only laboratories that meet UNEP minimum requirements. However, in future we plan to send a small selection of duplicate samples to internationally certified laboratories to check and validate sample analysis data from local laboratories. Second, the number of sampling points on a particular lot is based on the size and area covered by the lot. However, within the available resources, the number of samples we can take and analyse is limited. Therefore, where samples are identified that exceed thresholds, it indicates there may be wider problems across an individual lot.

Status of clean-up at lots

We have categorised the clean-up process at individual lots according to nine-stages, as detailed in indicator five in table one (Key Performance Indicators), as a way to monitor progress of remediation activities by contractors.

Annex one contains a list of all 57 lots by their lot number, community and contractor. Seven of these lots (35, 36, 37, 38, 39, 40 and 41) are assessment lots to determine if remediation will be required. Therefore, the assessment and monitoring of the clean-up is currently based on 50 lots. To enable the project's environmental monitors to ascertain the exact stage that each lot is at, a checklist (annex 3) of items that qualifies a lot for a stage is used. If problems are identified, these are noted and are detailed in the database.

Table 6 shows the various lots by their current stage of remediation.

Table 6: Lots by remediation stage as of June 2021

Remediation Stage	Lot Number (and total number, n)	% of Lots	Explainer
Not assigned to a contractor	-		This refers to lots that are yet to be awarded.
Handover of site to contractor	32, 49 (n = 2)	4%	This refers to lots that have been awarded to contractors and communities are aware of the contractor, but work is yet to commence.
Site setup	27, 55 (n = 2)	4%	These are lots where the contractor has commenced initial preparatory work such as bush clearing, perimeter fencing and site office.
Construction of biocell	50, 51, 52, 53 (n = 4)	8%	The contractor has started the construction of the engineered biocell i.e. setting up bund walls, HDP liners etc.
Soil excavation	16, 22, 24, 25, 30, 33, 45, 54 (n = 8)	16%	The contractor is in the process of digging up contaminated soil that will be moved to the biocell for treatment.
Soil treatment and remediation	9, 11, 12, 13, 23, 28, 29, 31, 34, 44, 47, 48, 56, 57 (n = 14)	28%	The contractor has started remediation by treating the soil in the biocell.
Inspection and certification	3, 15, 21, 26, 42, 43, 46 (n = 7)	14%	The contractor has reportedly completed remediation, and NOSDRA has commenced the process of sample collection for analysis, closeout and certification.
Demobilisation from site	-	-	Remediation work has been completed, landscaping has been done and all structures have been removed from site.
Handover to HYPREP/closed out	1, 2, 4, 5, 6, 7, 8, 10, 14, 17, 18, 19, 20 (n = 13)	26%	The lot has been certified by NOSDRA

Remediation is a slow process, and needs to be carried out correctly. However, the contractors for the first 21 lots were assigned in early 2019, and only 13 of these lots have been certified⁷. The remainder should have been completed by now and these contractors have been onsite far longer than their initial approved contract. This has cost implications through contract variations and amendments. For the second batch of lots (lot 22-57), there are eight that are at biocell construction stage or earlier, which also appears to represent very slow progress.

In addition to looking at the current stage of progress, as part of their quarterly monitoring visits, our project monitors also checked whether contractors had been on site and active in the past month. Table 7 below summarises this data.

We observed that almost 30% of contractors were not on site when it would be reasonable to expect them to be. Most of these contractors claimed the reason why they were not on site was that their milestone payment had been delayed. HYPREP attributed these payment delays to the absence of the Board of Trustees (BoT) and Governing Council (GC) between August 2020-March 2021, as payments to contractors cannot be approved without approval from members of these structures. HYPREP reports that this issue has now been resolved, and therefore we expect to see most contractors back on site, and an increased pace of work.

⁷ However, as previously noted, our sample data indicates that lots 6 and 20 still require remedial action.

This delay demonstrates that despite structures being in place to ensure accountability and proper management of the project, there remain significant challenges to the smooth implementation of the clean-up. These delays are a hindrance to the achievement of the mandate of HYPREP and further prolong the delays Ogoni citizens have experienced in seeing an adequate clean-up.

Table 7: Contractor presence for active lots

Contractor Presence	Lot Number (and total number, n)	% of Lots	Explainer
Contractor has been present and active	12, 13, 22, 23, 24, 25, 27, 28, 30, 31, 33, 34, 42, 44, 47, 48, 50, 55 (n = 18)	48.6%	Contractor is actively on site engaged in various remediation works.
Contractor has not been present and active	9,11,16,29,32,45,49,51,52,53,54 (n = 11)	29.7%	There is no physical presence of the contractor on site. Site office and perimeter is locked.
Contractor has completed work on lot and is awaiting certification	3,15,21,26,43,46,56,57 (n = 8)	21.6%	Contractor has reported that is has completed remediation work and is undergoing inspection and certification by NOSDRA, and therefore, activity on site in the past month is not necessarily expected.

5.2. Community engagement

Communities in Ogoniland have suffered decades of oil spill pollution and there is widespread apathy and mistrust because of the failure to implement a timely, effective clean-up. Therefore, open communication and transparency, and building community trust, buy-in and support, is critical to the success of HYPREP. This part of our monitoring project assesses levels of community awareness and satisfaction with the clean-up process, and whether adequate processes have been put in place to manage complaints and potential conflict.

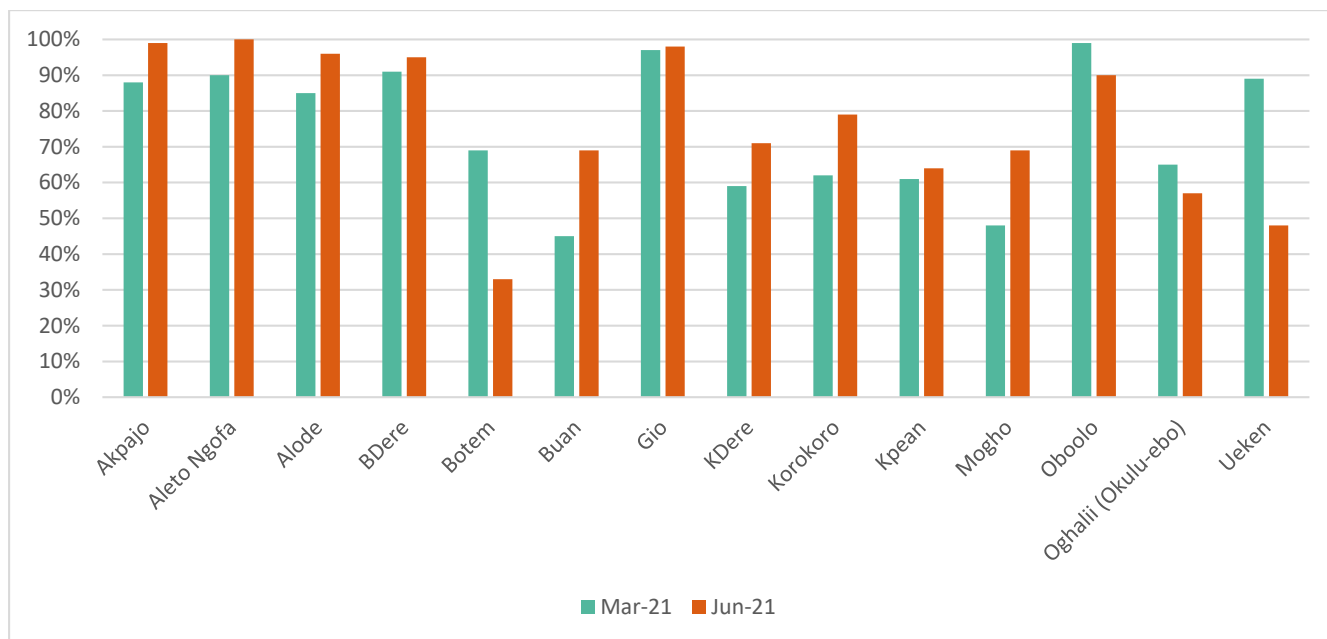
Community awareness

We surveyed 1,400 community members across the 14 communities where the clean-up is active at present, asking the following four questions as a way of gauging how aware community members are of basic information about the clean-up:

1. We have been informed that the contractor(s) will compensate land owners for access to lots
2. I am aware that contractor(s) were introduced and formally handed over to my community
3. We have been informed that the contractor(s) will be employing some persons from my community
4. We have been informed of the number of clean-up lots in my community

Our indicator score is based on the percentage of respondents that answered “yes” to at least three of the four questions, as a proxy for measuring awareness. Figure 3 below shows this data.

Figure 2: Percentage of community members deemed to have a good basic awareness of key information about clean-up in their communities, as surveyed in March and June 2021 (defined by answering “yes” to at least three of the four statements listed above)



Based on this measure, a total of 76% of respondents surveyed in June (and 75% in March) had a good basic awareness of key aspects of the clean-up in their community. This demonstrates that HYPREP’s communication activities do seem to have reached a good proportion of community members in Ogoniland and there is a good overall level of public awareness. However, there remain some important areas for improvement, with a number of communities where awareness appears to lag far behind the average. Three communities – Ogale, Ueken and Botem – scored below 60%. Botem and Ueken communities are of particular interest. Ueken neighbours Korokoro, and this appears to have had an impact on awareness creation, as the community feels they were not properly informed as HYPREP focused more on the larger and more prominent Korokoro community. Botem, on the other hand complained that the process was “hijacked” in their community by a “political bigwig”, and they claim they are completely unaware of some of the processes. The significant drop in reported levels of awareness between March and June in these two communities is an unusual result, and we believe most likely attributable to feelings of dissatisfaction linked to the above issues, rather than a reduction in awareness.

HYPREP’s communication efforts ought to prioritise increasing efforts in these three communities in particular. On the other hand, there are several communities where levels of awareness appear to be very high (Akpajo, Aleto Ngofa, Alode, Bdere, Gio, and Oboolo). HYPREP should learn from its approach in these communities and transfer them to communities where there are challenges.

Community satisfaction

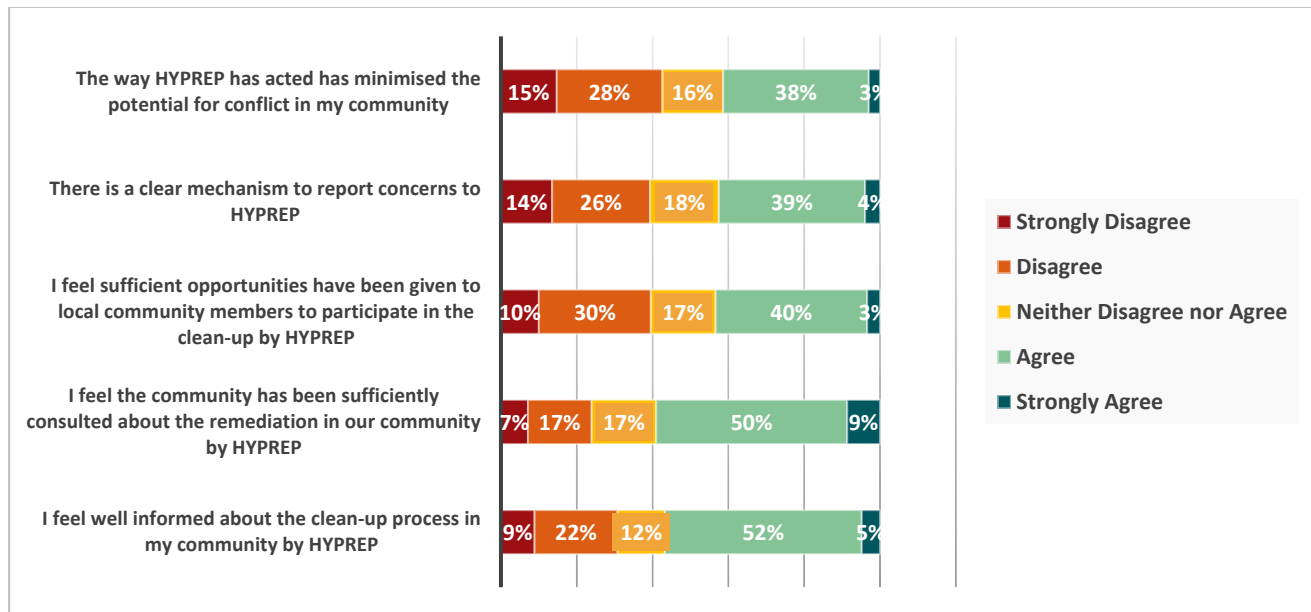
We monitor community satisfaction with HYPREP and the individual contractors operating in communities. To measure this, we selected five different statements for community members to rate their assessment of contractor and HYPREP performance, on a scale of 1 (“strongly disagree”) to 5 (“strongly agree”). The exact

statements can be seen in table 1, and they related to whether community members feel they have been well informed and consulted on the clean-up, if sufficient opportunities exist for participation, if it is possible to report concerns, and if measures are being taken to minimise conflict.

These scores are averaged to provide an overall “satisfaction score”, where a score of 1 would represent complete dissatisfaction, and 5 complete satisfaction, with the actions of contractors and HYPREP. This is a proxy indicator, which aims to create a systematic way of measuring satisfaction and enabling comparability over time and across communities. Because we only use these five statements, this indicator could miss other issues which are causing dissatisfaction or satisfaction in communities. However, these issues tend to come up in discussion during our surveys and FGDs, and we will aim to report on these anecdotally in our reports.

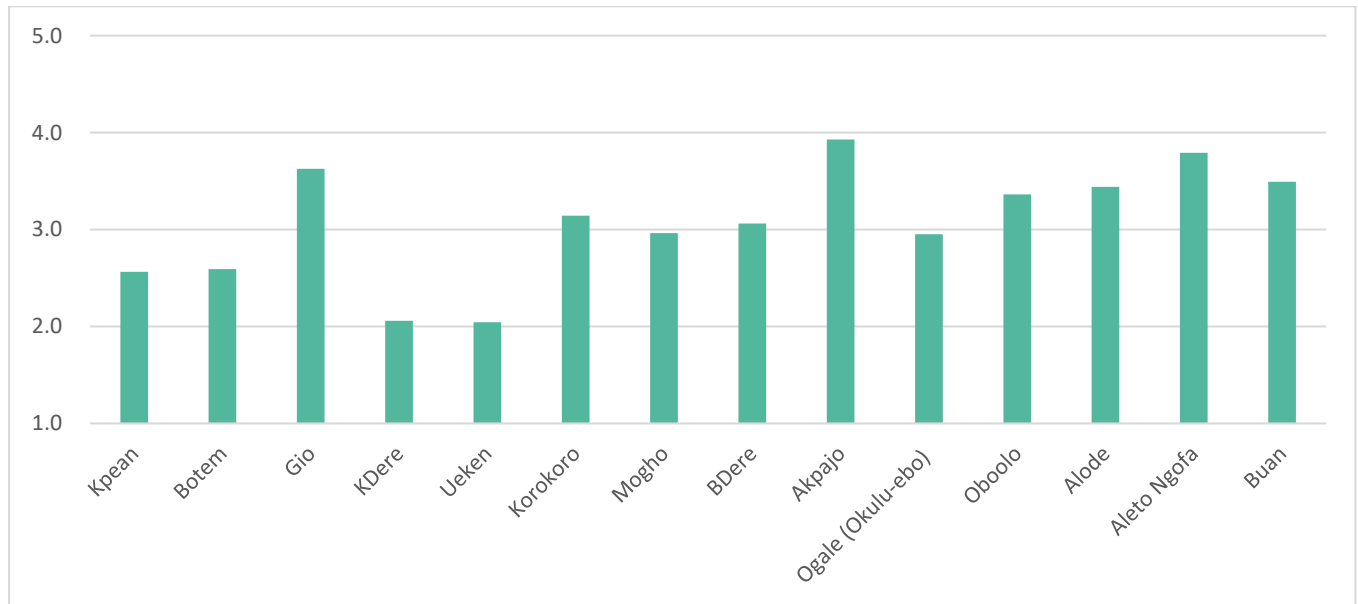
Satisfaction with HYPREP was measured using a survey of 1,400 respondents (100 in each of the current target communities). HYPREP’s overall satisfaction score in June was 3.1, indicating neither overall dissatisfaction or satisfaction with its performance. However, this is a slight increase on March, where the same indicator score was 2.8. We have focussed our analysis on June data here as it is most relevant. When June responses are broken down (see figure 4 below), this shows that HYPREP scores best for levels of information and consultation, but more poorly in creating opportunities for participation, reporting concerns, and managing conflict.

Figure 3: Breakdown of responses to individual questions comprising the basis for the community satisfaction score for HYPREP’s performance (N=1400)



The overall satisfaction score by community is shown below. This shows particularly low levels of satisfaction in Kpean, Botem, K.Dere, and Ueken. In contrast, Akpajo, and to some extent, Gio and Aleto Ngofa, are communities where satisfaction levels appear to be relatively good, albeit with plenty of room for improvement. Combined with the data on awareness, there are some emerging patterns among communities. SDN and CEHRD will be aiming to discuss these differences with HYPREP, to understand why this is the case, and to see how lessons from communities where satisfaction levels are relatively high can be transferred to those where there appear to be problems.

Figure 4: Overall satisfaction score by community for HYPREP's performance (1 = complete dissatisfaction, 5 = complete satisfaction)

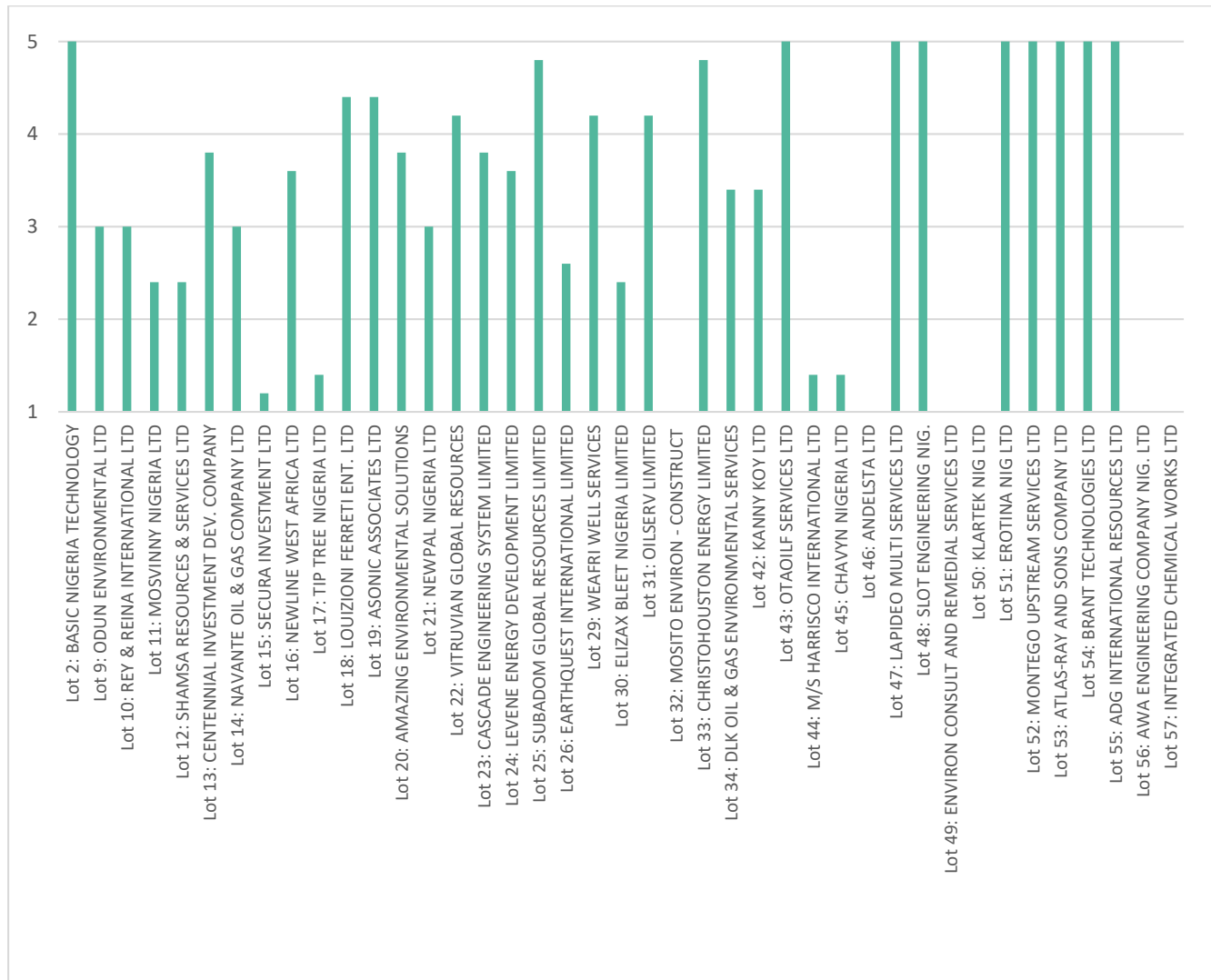


Satisfaction with contractor performance at individual sites was measured in a similar way to satisfaction with HYPREP, but done through FGDs to target individuals with a level of knowledge about progress at clean-up sites. FGDs were conducted in 12 communities⁸ with a representative group drawn from the Chiefs, Community Development Committees (CDC), Women leaders and Youth Leaders of the various communities.

The overall satisfaction score for contractor performance at lots was 3.3/5.0. Similar to the satisfaction score for HYPREP, this indicates neither overall dissatisfaction or satisfaction with contractor performance. However, the detailed breakdown of this data by lot and contractor shows a very high level of variation and some areas of serious concern, alongside high levels of satisfaction with some contractors.

⁸ Unfortunately, representatives of Alode community did not want to participate, and Ueken community was experiencing high levels of insecurity due to cult clashes, which meant they were not visited on this occasion.

Figure 5: Average contractor satisfaction score by lot and contractor, June 2021 (1 = complete dissatisfaction, 5 = complete satisfaction)



As can be seen, six lots and contractors score the minimum of 1 (indicating complete dissatisfaction), while a number of others also score very low. Those of most concern are:

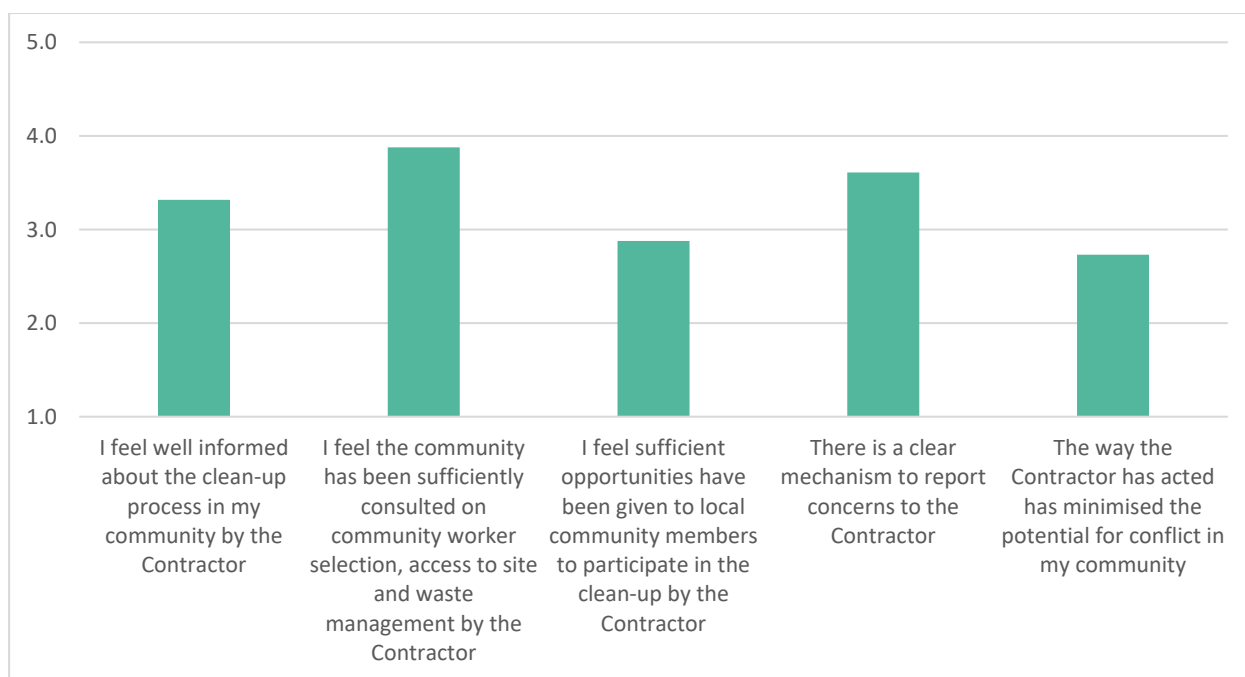
- Lot 11: Mosvinny Nigeria Ltd
- Lot 12: Shamsa Resources & Services Ltd
- Lot 15: Secura Investment Ltd
- Lot 17: Tip Tree Nigeria Ltd
- Lot 26: Earthquest International Limited
- Lot 30: Elizax Bleet Nigeria Limited
- Lot 32: Mosito Environ - Construct

- Lot 44: M/S Harrisco International Ltd
- Lot 45: Chavyn Nigeria Ltd
- Lot 46: Andelsta Ltd
- Lot 49: Environ Consult And Remedial Services Ltd
- Lot 50: Klartek Nig Ltd
- Lot 56: Awa Engineering Company Nig. Ltd
- Lot 57: Integrated Chemical Works Ltd

We recommend that HYPREP urgently meet with these contractors and the relevant communities to understand what is going wrong and to find ways to improve levels of community satisfaction with the performance of contractors.

The reasons for community concerns vary across contractors, however, the breakdown of average scores across different areas of contractor performance indicates community participation and management of conflict tend to be of most concern (see figure below). Low levels of local content in terms of sub contracts to the community members and ineffective conflict resolution mechanism were repeatedly raised as complaints when we spoke with communities.

Figure 6: Average ratings across all contractors on satisfaction sub-components (1 = strongly disagree, 5 = strongly agree)



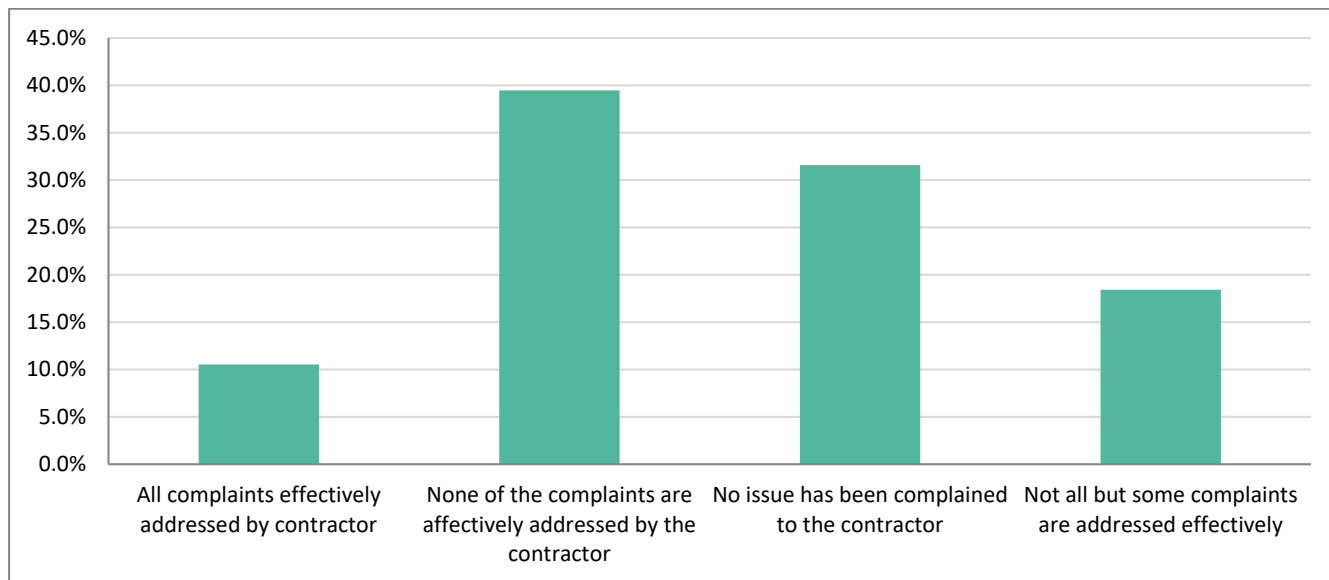
However, it is also worth noting that some expectations of benefits to be received from contractors are also not within the scope of what could reasonably be expected from them. Therefore, part of the solution lies in HYPREP ensuring community expectations of the clean-up and the work of contractors is clearly communicated.

Conflict Management

In this type of project, there is a high potential for conflict if relationships with communities are not managed well. In order to address conflict and ensure the smooth operations of remediation work, HYPREP issued a document ‘Guideline and Rules for Conflict Resolution, Community Engagement and Contract Administration’ to each of their contractors. This document was developed by HYPREP to facilitate easy access to sites for the implementation of HYPREP activities in the various host communities. The document sets out the process for the conflict management between the contractor and community. Our FGD asked community leadership about this process. As can be seen in figure 13, we found out that 94% of contractors have developed and used the laid down process for conflict management, while 6% are yet to take action. However, further findings also show that

at 40% of lots, communities feel that no complaints raised have been resolved, and at a further 18% their concerns have only been partially resolved. For example, according to a Chief during a FGD in Botem-Tai: “We do not know what the contractor is doing; he does not communicate us at all”.

Figure 7: Contractor complaint resolution status a clean-up lots



To further resolve conflicts, HYPREP also set up a Central Representative and Advisory Committee (CRAC) to also address conflicts at the kingdom levels (Ogoni has 6 kingdoms, namely Nyo Khana, Ken-Khana, Babbe, Eleme, Tai and Gokana). However, our findings showed that out of 12 communities where FGDs were held, only eight reported being aware of CRAC and their functions, and two communities (K.Dere and Aleto-Ngofa) out of the eight communities reported issues to CRAC. However, Aleto-Ngofa reported that none of their complaints were effectively resolved, while K.Dere on the other hand, had some of its concerns resolved. According to a Chief during an FGD in K.Dere community, “If CRAC were available, we would not have taken our community site labour case to court”. In Botem, Tai, the situation is reportedly no different. A member of an FGD in the community stated, “Where is the CRAC team? We could have reported the contractor working in Botem, concerning issues of selection of community labour”.

5.3. Emergency measures

Due to the severity of the impact of oil pollution on the lives and livelihoods of Ogoni inhabitants, the UNEP report recommended some emergency measures, such as provision of potable drinking water and health interventions in impacted communities. HYPREP has reacted slowly to implement these recommendations. The first version of HYPREP established in 2012 put up signs marking various contaminated water sources in the communities as polluted and not fit for drinking, fishing and other recreational purposes. This defunct HYPREP sent trucks filled with drinking water to these communities, which was clearly not a sustainable strategy, and inevitably did not last. It has taken the current HYPREP regime five years to commence the provision of potable water. The Minister of Environment flagged off the commencement of water provision process on 22nd March 2021 (World Water Day) at an event that was attended by various stakeholders including traditional rulers, the

new HYPREP Board of Trustees and Governing Council, government officials, Shell Petroleum Development Company (SPDC), UNEP, others and a large crowd of Ogoni indigenes.

Currently, HYPREP has awarded six contracts for the installation of new water facilities and rehabilitation of existing water facilities involving new boreholes, water tanks and treatment facilities. These projects are located in Alesa-Elеме, Ogale-Elеме in Elеме LGA; Terabor, K.Dere and B.Dere in Gokana LGA, Nnowa and Korokoro in Tai LGA; and Bori and Kpean in Khana LGA. Water from these facilities will be piped to other communities in the LGAs. FGDs held in these communities revealed that although HYPREP has introduced the contractors to the communities and the contractors have 'paid homage' to the traditional rulers in their host communities, actual work is yet to commence. Some communities have also questioned why the water project that is to serve their communities is not sited in their community. Regarding a visit by contractor, in Ogale, a Chief told us that: *"They have come to see us, but they are yet to start work, we are patiently waiting for them"*.

On the health interventions, the UNEP report stated that a health registry should be set up in the various impacted communities to record the health status of individuals, and monitor this for cases of illness related to exposure to oil. However, HYPREP has instead carried out a medical outreach across the LGAs, where sick people were attended to and minor surgical operations done. Although welcomed, this is not what the UNEP recommendation stated. Therefore, a health registry still needs to be established in every community. HYPREP has informed CSOs that health studies and data collection will be done in collaboration with the World Health Organisation (WHO), Swiss Tropical Health Institute, University of Port Harcourt Teaching Hospital and Rivers State Ministry of Health. We are looking forward to HYPREP's intervention, and will monitor and report progress.

5.4. Livelihoods

Oil pollution is one of the major causes of unemployment in impacted communities as their sources of livelihood – such as farmlands and streams – have become polluted. The ongoing remediation in Ogoniland has created some temporary jobs across the impacted communities, with an average of 20 community workers nominated by their community employed by each contractor. Findings from the field during surveys and FGDs indicated that a total of about 1,057 youths are employed by the various contractors. However, only 67 (6%) of these workers are female. Separate from the clean-up, HYPREP has made an attempt to create jobs for women by training 400 on agricultural livelihoods. Their plan is to expand on this and train a total of 1,200 women in agribusiness. However, the women interviewed during monitoring were not satisfied with the training received, as they said they were not given adequate starter packs to establish an enterprise, with some asked to set up poultry or fishponds by themselves. According to one of the woman leaders in one of the communities who was a trainee, *"We do the training finish and they say make we go build cage for chicken"*. Another local woman said, *"They gave me some birds o, but no feed. At times if I feel pity for the birds I will go and feed them garri (cassava)"*.

To capture other segments of Ogoni society under its livelihood work, HYPREP plans to train 3,000 young people on various livelihood skills, this is yet to commence but needs assessment forms have been shared among young people.

5.5. HYPREP Infrastructure

To institutionalise excellence in environmental remediation and practice, UNEP recommended that there should be a Centre of Excellence for Environmental Restoration (CEER). The CEER is expected to train Ogoni people as well as other Nigerians in environmental best practice for the restoration of degraded environments. However, since the inception of HYPREP, work has not progressed in this regard. At a stakeholder meeting in December 2020, where HYPREP shared their work plan, they noted their intention to commence the engineering design for the CEER in 2021, but we are unaware of progress on this.

Establishment of the Integrated Contaminated Soil Management Centre (ICSMC) is another facility proposed by the UNEP report for the treatment of highly contaminated soils. As it is, the current engineered biocell technology being deployed for simple sites is inadequate for the treatment of complex sites. As stated, the CEER and the ICSMC is yet to be built. It is expected that before HYPREP commences the remediation of complex sites, this facility should have been set up.

6. Discussion, conclusions and recommendations

This section of the report provides some further discussion of the findings above and recommended actions to be taken. HYPREP and NOSDRA have already been engaged on a number of these issues and have reacted positively to some of the findings. We look forward to further constructive engagement on the below conclusions and recommendations and, where appropriate and relevant, we are ready to do what we can to support the implementation of them.

6.1. Site clean-up

Bioremediation is the technology employed by most contractors remediating contaminated soils in the Ogoni clean-up project using an engineered 'biocell'. The biocell is a treatment unit designed with good effluent management where heaps of contaminated soil excavated from the contaminated sections of the lot is treated by the application of NOSDRA approved nutrients until the contaminant level reduces to agreed TPH/BTEX levels. After treatment, the soil is returned, or 'backfilled', into the pit where it was excavated. NOSDRA commences the process of certification and closeout by visiting the site to take samples at various depths where the soil was excavated. Our project monitors joined NOSDRA, HYPREP and Rivers State Ministry of Environment to 10 lots (see table 4) and collected the same samples, which were independently analysed at a laboratory.

Our findings show that 20 samples collected (representing 5% of all samples collected) at various depths from lots 3, 6, 15, 20 and 43 exceed TPH and BTEX levels. This means that 50% of lots where sampling took place require further action. We are aware that lots 6 and 20 have been closed out and certified by NOSDRA, while lots 3, 15 and 43 are awaiting NOSDRA's certification. NOSDRA have informed us that they recommend corrective action for lots where the TPH levels are above closeout limits. However, we were not part of the process and did not have the opportunity to conduct a second analysis. However, our project monitors should be informed about this outcome so that samples can be collected and re-analysed.

During our field visits for sample collection, we noted that sampling is not taking place at the location of biocells, which could become polluted from secondary pollution during mixing of contaminated soil with nutrients or vehicular movement in and out of the biocell. We also observed that some lots that have been closed out still had structures like bund walls, septic tanks and small buildings. We had these discussions with NOSDRA who explained that no contractor has decommissioned their site yet, as this will involve landscaping. NOSDRA committed to taking samples from the biocell area to limit the possible issue of secondary contamination. Furthermore, during augering for sample collection, we observed that the high levels of TPH were found at only a certain depth (strata). We believe that this had to do with soil clumps that weren't broken down properly and were backfilled. We expect that HYPREP and NOSDRA will closely supervise the backfilling process by creating a suitable standard operating procedure (SOP) for this activity to ensure uniform degradation of contaminants.

Recommendations to HYPREP:

- Ensure corrective action is taken at lots 3, 6, 15, 20 and 43 which have failed to meet the thresholds for clean-up to be certified, inform us of remedial actions taken for these lots, and re-invite our monitors for a new round of sampling at the appropriate point.

- Create a suitable standard operating procedure (SOP) for the backfilling process, commence close supervision of this process to ensure uniform degradation of contaminants, and ensure sampling also takes place at biocell locations.

6.2. Community engagement

HYPREP has achieved a relatively high overall public awareness of its activities, especially those happening in the immediate environment of communities, by engaging traditional institutions, youth and women groups, but a lot still needs to be done. Some communities have levels of awareness of HYPREP activities well below the average. Through our discussions, we also found that there are some widespread misunderstandings about the clean-up, which in particular have resulted in unnecessary expectations and demands being made of clean-up contractors.

In terms of satisfaction, there are a number of communities where levels fall well below the average for HYPREP's performance, and the main areas for improvement tend to relate to ensuring clear expectations of, and adequate community participation in, the clean-up; and in ensuring effective complaint and conflict management. There are also communities where satisfaction levels are relatively high, and these represent a clear opportunity to learn from better practice, to apply this to locations where there are challenges.

Levels of satisfaction with contractors is the area of deepest concern from our community engagement data. There appears to be a very high level of variation in contractor performance. While there are examples of very high levels of community satisfaction with contractors, we have highlighted at least 14 clean-up lots where community perceptions of contractor performance are highly concerning. This increases the likelihood for conflict, dissatisfaction, disruption, and poor quality clean-up outcomes, so needs to be addressed.

Finally, while complaint mechanisms have reportedly been put in place – both for HYPREP and the majority contractors – in the majority of cases, mechanisms to ensure effective responses appear to be weak. HYPREP has set up dispute resolution systems to forestall conflict and respond to complaints by issuing a document guiding conflict resolution and community engagement to the contractors, and by setting up the Central Representative Advisory Committee (CRAC), which is made up of prominent traditional leaders, to address community issues. Despite this, the systems have not been effective, as most of the communities report that they have not had their issues effectively resolved, either via the conflict resolution mechanisms of the contractor or CRAC. In some communities where we interviewed leaders, some were not even aware of the existence or functions of CRAC. Some community leaders also had concerns with the Community Contact Persons (CCPs) representing their community at the remediation lots. Some of these CCPs from our findings have failed to give their leaders updates on progress at the various lots; this has bred suspicion and lack of trust.

Chieftaincy tussles and factions within the communities threaten the success of the remediation work. HYPREP has tried to manage this by engaging with all factions, but this is an unacceptable approach to recognised community chiefs. This situation is unfortunately common in some Niger Delta communities, and can be very challenging to manage. Therefore, a carefully considered, open and sensitive approach is needed. This is one area that CRAC should step in and address, which has been lacking in the process so far. We would like to see a

revitalised CRAC that is well empowered and funded to resolve issues to ensure the continued progress of the clean-up in impacted communities.

Recommendations to HYPREP:

- Learn lessons from communities where levels of awareness of the clean-up are high to establish best practice for further engagements with all communities. In particular, use this to engage in in Ogale, Ueken and Botem communities, where we recorded poor levels of awareness of the activities of the clean-up.
- Learn lessons from communities where levels of satisfaction with HYPREP are higher to understand the reason for the differences and to establish best practice for further engagements with communities. This includes in Kpean, Botem, K.Dere, and Ueken communities, where we recorded low levels of satisfaction with HYPREP.
- More broadly, an Ogoni-wide exercise is needed to re-engage with all communities to clarify the roles and responsibilities of contractors to ensure there are not unrealistic expectations of what direct benefits contractors may confer to community members, while also ensuring communities can hold contractors to account for the role they should be fulfilling.
- Call meetings between the communities and contractors for lots 11, 12, 15, 17, 26, 30, 32, 44, 45, 46, 49, 50, 56 and 57, to understand the reason for high levels of dissatisfaction with contractor performance and to put in place plans to address these.
- Provide refresher training for Central Representative and Advisory Committee (CRAC) members on their roles and responsibilities and put in place a clear process for documenting and following up on/resolving complaints.

6.3. Emergency measures

Progress towards the delivery of emergency measures has been extremely slow. While contractors have now been engaged for the creation of new water schemes to provide improved portable water sources to all communities, existing polluted water sources appear to be inadequately sign-posted, and work on a health registry has not started in any community.

Recommendations to HYPREP:

- Urgently commence planning for the creation of health registries for every target community, which are a prerequisite to further health interventions.
- Publish a timeframe for commencement and completion of potable water projects.
- Ensure that all contaminated sources of water (drinking, fishing and swimming) are properly signposted, an inventory of these locations produced and published, and remediated to protect the health and lives of Ogoni people.

6.4. Livelihoods

The remediation works across the area have brought about jobs, albeit temporary. Employment opportunities provided via contractors as part of the clean-up have extremely low levels of female participation (6% of all employees). It is community members that play a major role in selecting young people to participate, and so HYPREP can play a role in encouraging communities to ensure a minimum level of selection for women. Communities have also complained that the meagre NGN~~N~~5,000 daily (GBP£7) is too little for young people employed by the contractor.

As part of its wider remit to regenerate livelihoods in Ogoniland, HYPREP has also trained 400 women in agribusiness via training by United Nations Institute for Training and Research (UNITAR). The outcome of this training seems not to have had the desired results, as participants complained of incomplete starter packs. For instance, they reported that they were given birds and fingerlings without feed, cages, or ponds for them.

Recommendations to HYPREP:

- Set a quota for female participation in clean-up activities of 50%, and work with community leadership to implement this.
- Re-evaluate the design of the wider livelihoods programme. The current approach is focussed on training and start-up kits, which are high-cost and low-reach, and appear to be inadequate from the perspective of participants. A more holistic, market-based approach would be a more effective use of HYPREP's resources, and more likely to result in sustained, wide-reaching economic opportunities for people living in Ogoniland.

6.5. HYPREP infrastructure

To our knowledge, no progress has been made towards the establishment of a Centre of Excellence for Environmental Restoration (CEER) and Integrated Contaminated Soil Management Centre (ICSMC). While the lack of the CEER and ICSMC have not necessarily been impediments to the clean-up of simple sites, the latter will be critical in the clean-up on complex sites, and without the former, HYPREP will miss the opportunity to develop the skills and expertise needed locally to ensure permanently improved capacity to deal with oil spill pollution across the Niger Delta region.

Recommendations to HYPREP:

- Urgently commence planning for the creation of the Integrated Contaminated Soil Management Centre, make public a timetable for its completion, and ensure this is in place prior to the commencement of clean-up at complex sites.
- Make public a timetable for the launch of the Centre of Excellence for Environmental Restoration.

Annexes

Annex 1: HYPREP clean-up lots

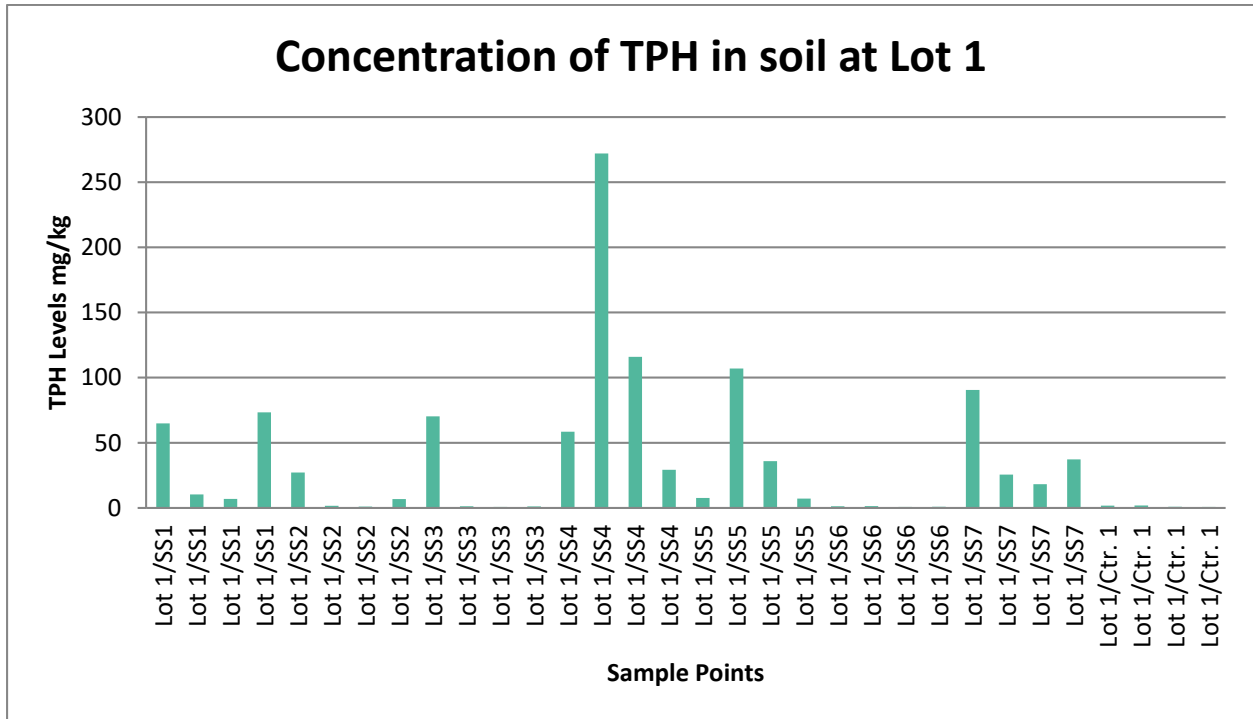
Lot Number	Contractor	Community
1	NAUTILUS NIGERIA ENGINEERING CONSTRUCTION LTD	Nkeleoken Alode
2	BASIC NIGERIA TECHNOLOGY	Oboolo
3	PACRIM ENGINEERING LTD	Nkeleoken Alode
4	RDK	Nkeleoken Alode
5	EARTHPRO UNIQUE INTEGRATED	Nkeleoken Alode
6	ENVIRONMENTAL RESOURCES MANAGER	Nkeleoken Alode
7	AVONDALE	Nkeleoken Alode
8	GIOLEE GLOBAL SERVICES	Nkeleoken Alode
9	ODUN ENVIRONMENTAL LTD	Mogho/Debon
10	REY & REINA INTERNATIONAL LTD	Mogho/Debon
11	MOSVINNY NIGERIA LTD	Mogho/Debon
12	SHAMSA RESOURCES & SERVICES LTD	Mogho/Debon
13	CENTENNIAL INVESTMENT DEV. COMPANY	Mogho/Debon
14	NAVANTE OIL & GAS COMPANY LTD	Mogho/Debon
15	SECURA INVESTMENT LTD	Kpean Well 13
16	NEWLINE WEST AFRICA LTD	Korokoro Well 5
17	TIP TREE NIGERIA LTD	Botem P/L
18	LOUZIONI FERRETI ENT. LTD	Korokoro Well 9
19	ASONIC ASSOCIATES LTD	Korokoro Well 8
20	AMAZING ENVIRONMENTAL SOLUTIONS	Korokoro Well 8
21	NEWPAL NIGERIA LTD	Korokoro Well 6
22	VITRUVIAN GLOBAL RESOURCES	Gio/B.Dere
23	CASCADE ENGINEERING SYSTEM LIMITED	Gio/B.Dere
24	LEVENE ENERGY DEVELOPMENT LIMITED	Gio/B.Dere
25	SUBADOM GLOBAL RESOURCES LIMITED	Gio/B.Dere
26	EARTHQUEST INTERNATIONAL LIMITED	Gio/BD.ere
27	MARM CONSULTING SERVICES LIMITED	Bara-Alue
28	EMAMED NIGERIA LIMITED	Bara-Alue
29	WEAFRI WELL SERVICES	Aabue Korokoro
30	ELIZAX BLEET NIGERIA LIMITED	Aabue Korokoro
31	OILSERV LIMITED	Gio/B.Dere
32	MOSITO ENVIRON - CONSTRUCT	Gio/B.Dere
33	CHRISTOHOUSTON ENERGY LIMITED	Gio/B.Dere
34	DLK OIL & GAS ENVIRONMENTAL SERVICES	Gio/B.dere
35	DILEX LIMITED	Oboolo
36	GIOLEE GLOBAL RESOURCES LIMITED	Nkeleoken Alode
37a	LAMOR CORPORATION AB/ONE SPECIALTY P & S NIG LTD	Saanako Mogho
37b	LAMOR CORPORATION AB/ONE SPECIALTY P & S NIG LTD	Debon

38a	AMAZING ENVIRONMENTAL SOLUTION INTERNATIONAL LTD	Buemene Korokoro
38b	AMAZING ENVIRONMENTAL SOLUTION INTERNATIONAL LTD	Bara Akpor-Botem
39a	GEOTERRAIN NIG LTD	Buemene Korokoro
39b	GEOTERRAIN NIG LTD	Aabue/Ueken Korokoro
40a	PW NIGERIA LTD	Gio/Bdere
40b	PW NIGERIA LTD	Bara-Alue
41a	RAIN FOREST LIMITED	Kebara-Kira
42	KANNY KOY LTD	Korokoro Well 4
43	OTAOILF SERVICES LTD	Aleto Ngofa
44	M/S HARRISCO INTERNATIONAL LTD	Aleto Ngofa
45	CHAVYN NIGERIA LTD	Aleto Ngofa
46	ANDELSTA LTD	Nsioken Akpajo
47	LAPIDEO MULTI SERVICES LTD	Okuluebu 2
48	SLOT ENGINEERING NIG.	Okuluebu 2
49	ENVIRON CONSULT AND REMEDIAL SERVICES LTD	Okuluebu 2
50	KLARTEK NIG LTD	Okuluebu 2
51	EROTINA NIG LTD	Okuluebu 2
52	MONTEGO UPSTREAM SERVICES LTD	Okuluebu 2
53	ATLAS-RAY AND SONS COMPANY LTD	Okuluebu 2
54	BRANT TECHNOLOGIES LTD	Okuluebu 2
55	ADG INTERNATIONAL RESOURCES LTD	Okuluebu 2
56	AWA ENGINEERING COMPANY NIG. LTD	Eledenwo/Akpajo
57	INTEGRATED CHEMICAL WORKS LTD	Eledenwo/Akpajo

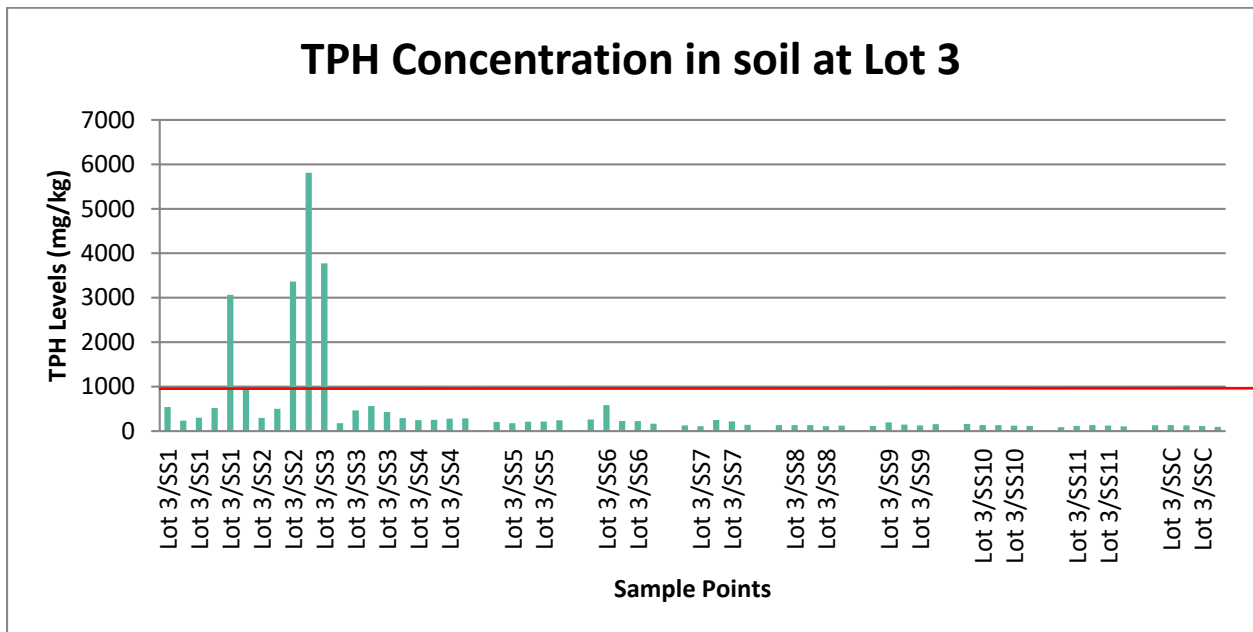
Annex 2: Checklists for Clean-up Status at Individual Lots

S/N	STATUS	CHECK LISTS
1.	Handover of site	Evidence in media reports? YES or NO Has HYPREP done a Kick off meeting? YES or NO Has the contractor been issued 'Guidelines and Rule for conflict resolution'? YES or NO Has HYPREP paid homage to traditional institution? YES or NO Does the contractor have certificate of handover? YES or NO
2	Site set up	Has the site been cleared by the community? YES or NO Has contractor paid community for site clearing? YES or NO Has the community submitted list of community workers? YES or NO Has contractor paid for compensation for crops if any? YES or NO Has contractor set-up site office? YES or NO
3	Biocell construction	Is there High Density Plastic (HDP) liner? YES or NO Is there sharp sand on the floor of the HDP liner? YES or NO Does the biocell have bund walls? YES or NO Is there a drainage tank in the biocell? YES or NO
4	Soil excavation	Has soil excavation commenced? YES or NO Are there signages warning people of the excavation to avoid accidents? YES or NO
5	Soil treatment and remediation	Has the contractor commenced moving soil to the biocell? YES or NO Has the contractor applied nutrients/chemical on the soil? YES or NO
6	Inspection and certification	Has the contractor and HYPREP commenced soil analysis? YES or NO Are there ground water wells for testing? YES or NO Has NOSDRA been to the site for certification? YES or NO
7	Demobilise from site	Are there still structures on site? YES or NO Has the contractor moved out of site? YES or NO Has grass tuft been planted on the remediated soil? YES or NO
8	Handover	Has the site been handed over to HYPREP? YES or NO Has HYPREP handed it over to community and landowners? YES or NO Is the site certified remediated by NOSDRA? YES or NO

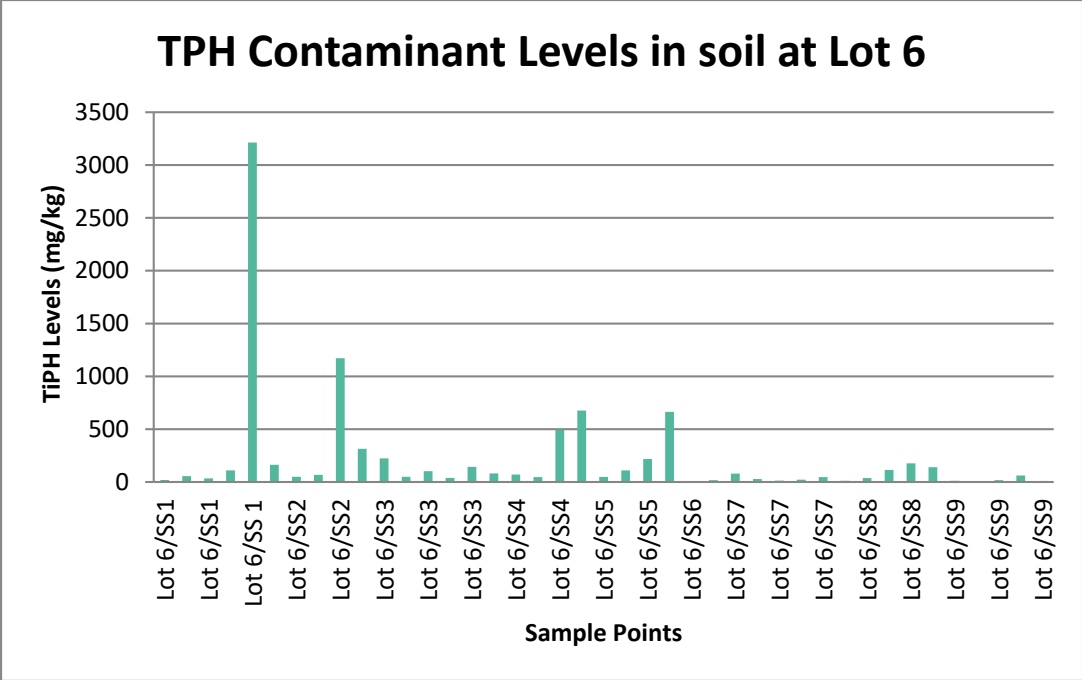
Annex 3: Concentration of TPH at the remediated Lots



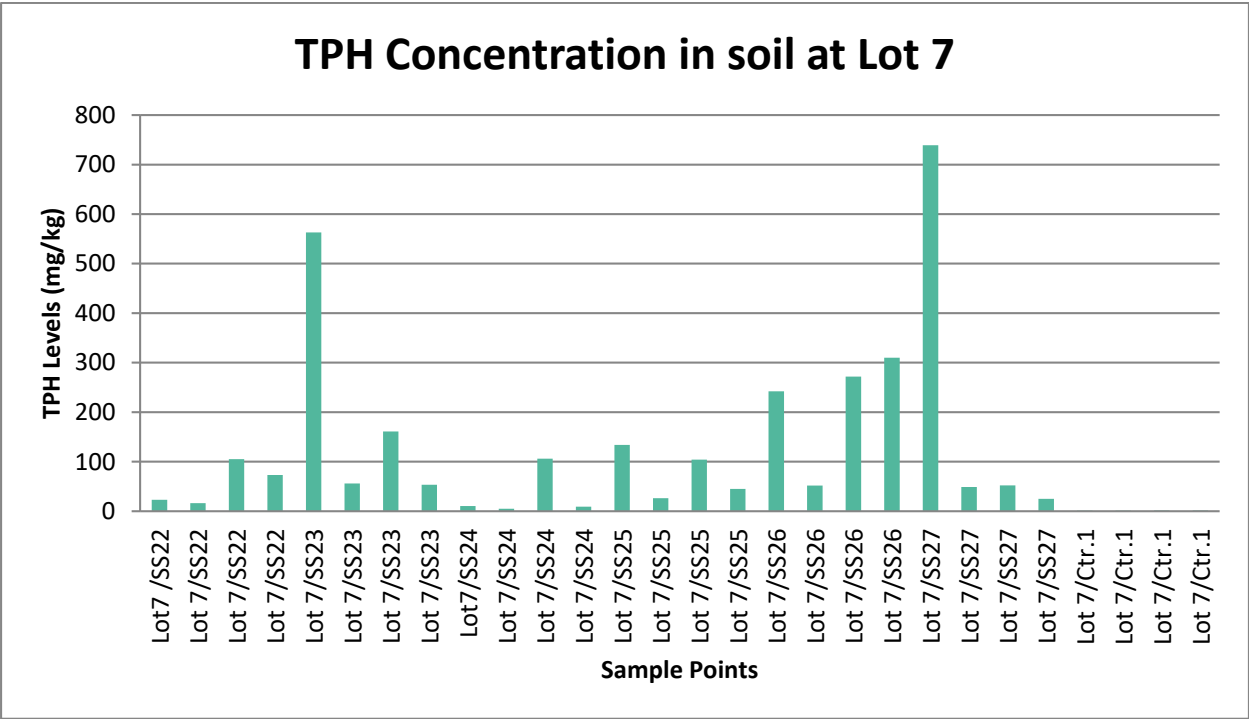
Closeout TPH concentration in soil at Lot 1(Nkeloken Alode) in Eleme LGA



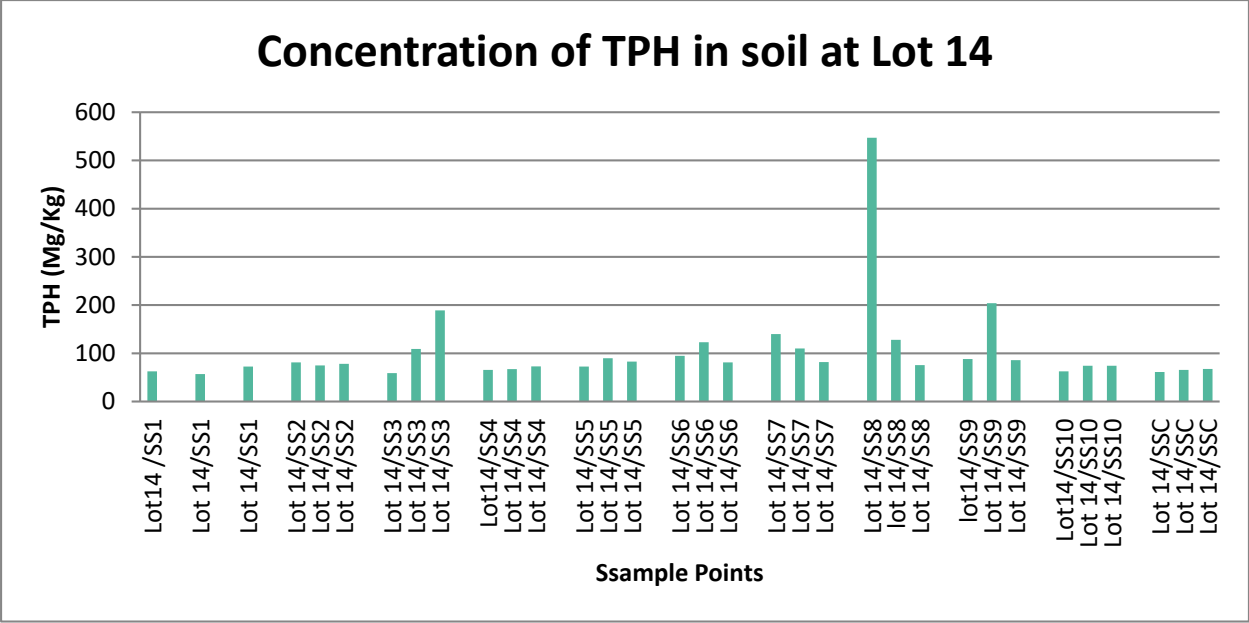
TPH concentration in soil at lot 3 (Nkeloken Alode) in Eleme LGA



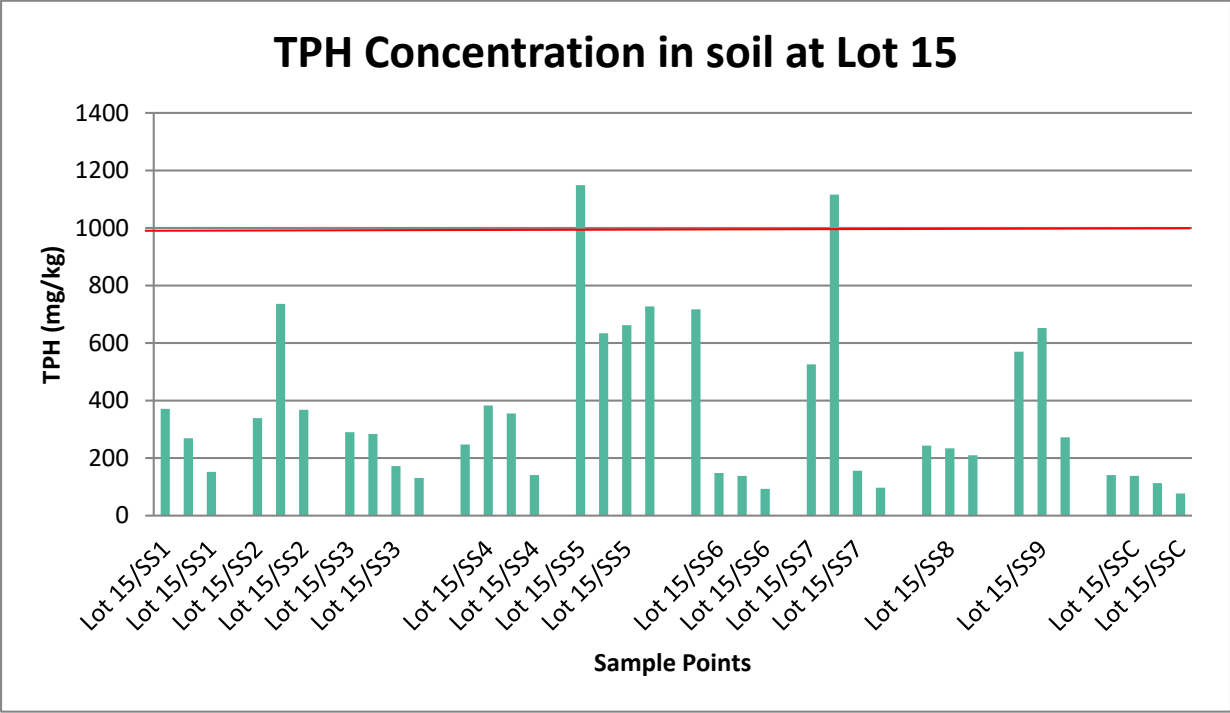
TPH concentration in soil at lot 6 (Nkeloken, Alode) in Eleme LGA



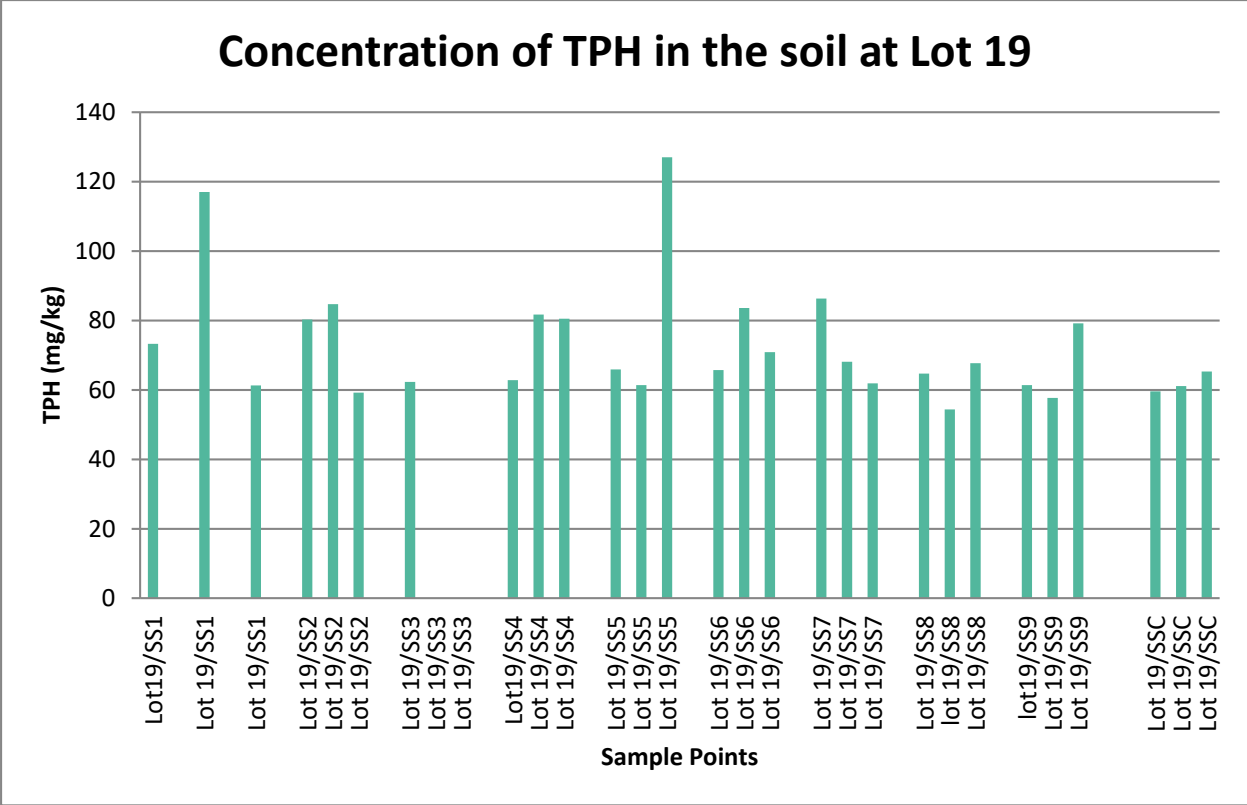
Concentration in soil at Lot 7 (Nkeloken Alode) in Eleme LGA



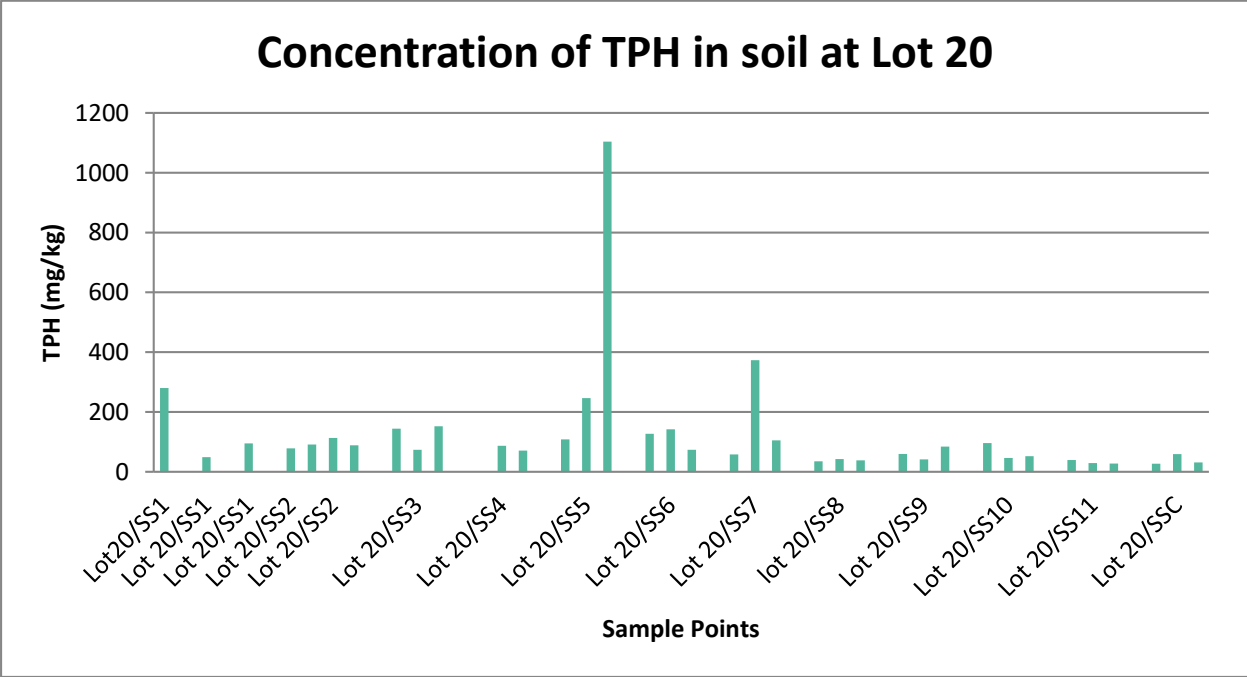
Concentration in soil at Lot 14 (Mogho) in Gokana LGA



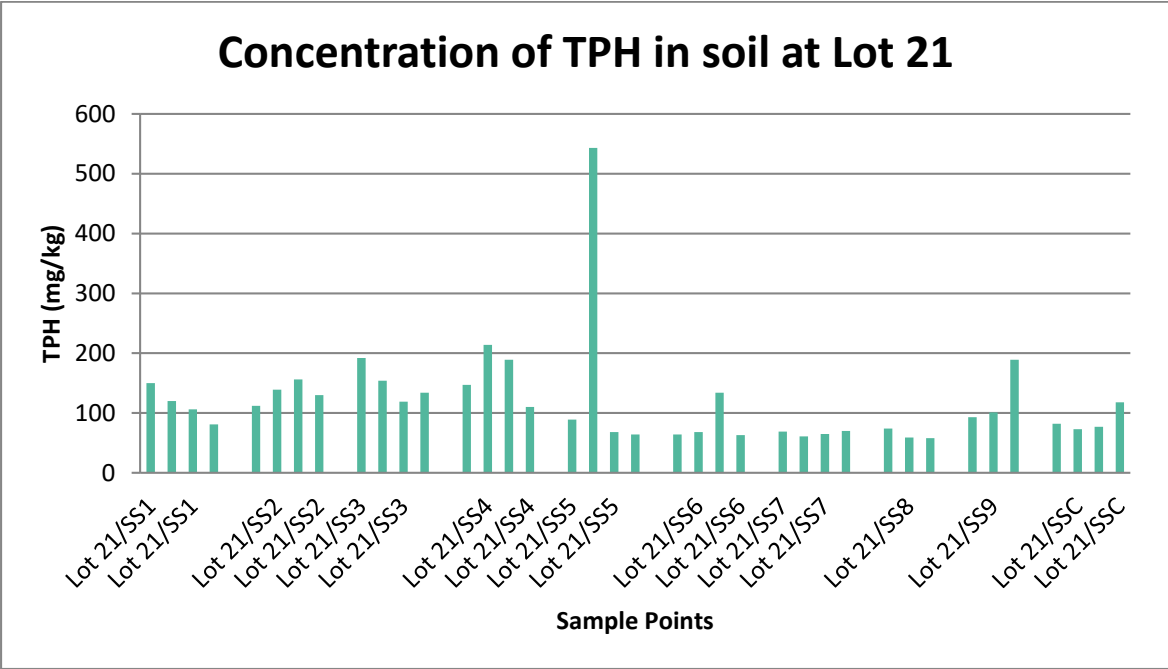
TPH concentration in soil at lot 15 (Kpean) Khana LGA



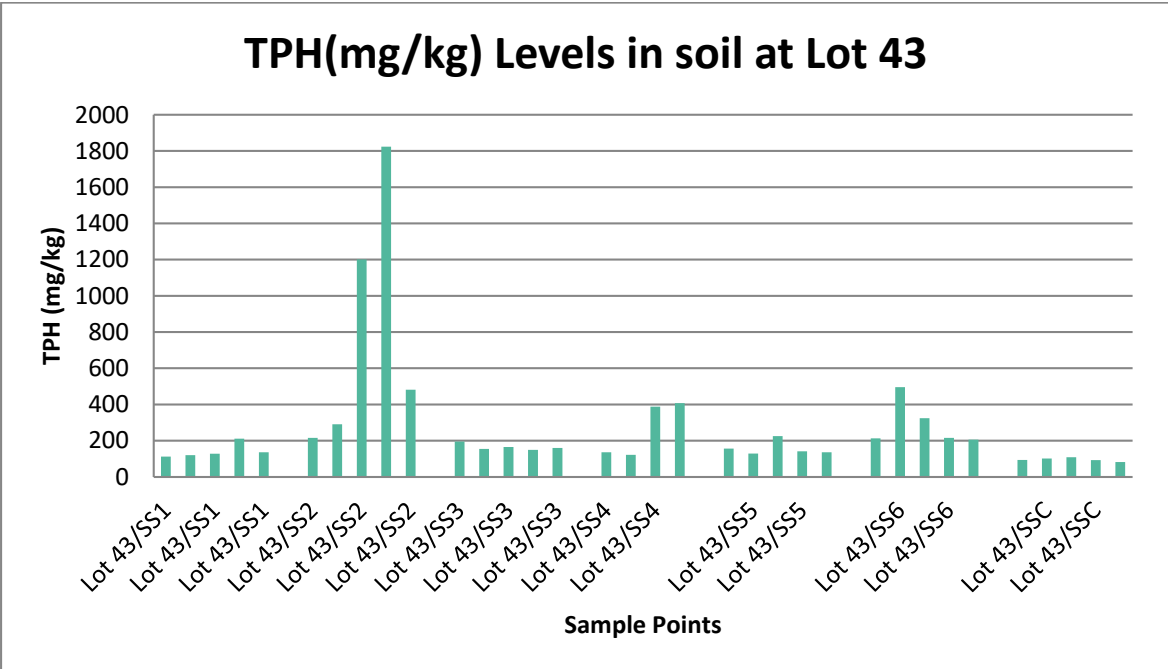
TPH concentration in soil at Lot 19 (Korokoro) Tai LGA



TPH concentration in soil at Lot 20 (Korokoro) in Tai LGA



TPH concentration in soil at Lot 21 (Korokoro-Ueken) in Tai LGA



TPH concentration in soil at Lot 43 (Ngofa Aleto) in Eleme LGA

Annex 4: Community Satisfaction with individual Lot/Contractor

Community	Lot Number	Contractor Name	I feel well informed about the clean-up process in my community by the contractor	I feel the community has been sufficiently consulted on community worker selection, access to site and waste management	I feel sufficient opportunities have been given to local community members to participate in the clean-up	There is a clear mechanism to report concerns to the contractor	The way the contractor has acted has minimised the potential for conflict in my community	Average
Oboolo	2	BASIC NIGERIA TECHNOLOGY	5	5	5	5	5	5.0
Mogho	9	ODUN ENVIRONMENTAL LTD	5	3	1	5	1	3.0
Mogho	10	REY & REINA INTERNATIONAL LTD	3	5	3	3	1	3.0
Mogho	11	MOSVINNY NIGERIA LTD	4	5	1	1	1	2.4
Mogho	12	SHAMSA RESOURCES & SERVICES LTD	4	5	1	1	1	2.4
K.Dere	13	CENTENNIAL INVESTMENT DEV. COMPANY	3	5	1	5	5	3.8
K.Dere	14	NAVANTE OIL & GAS COMPANY LTD	3	5	1	5	1	3.0
Kpean	15	SECURA INVESTMENT LTD	1	1	1	1	2	1.2
Korokoro	16	NEWLIN WEST AFRICA LTD	1	5	3	5	4	3.6
Botem	17	TIP TREE NIGERIA LTD	1	1	3	1	1	1.6
Korokoro	18	LOUIZIONI FERRETI ENT. LTD	5	5	3	5	4	4.4
Korokoro	19	ASONIC ASSOCIATES LTD	3	5	5	5	4	4.4
Korokoro	20	AMAZING ENVIRONMENTAL SOLUTIONS	5	5	3	5	1	3.8
Korokoro	21	NEWPAL NIGERIA LTD	3	1	5	5	1	3.0
Gio	22	VITRUVIAN GLOBAL RESOURCES	4	5	3	5	4	4.2
B.Dere	23	CASCADE ENGINEERING SYSTEM LIMITED	3	5	5	5	1	3.8
B.Dere	24	LEVENE ENERGY DEVELOPMENT LIMITED	4	5	3	5	1	3.6
B.Dere	25	SUBADOM GLOBAL RESOURCES LIMITED	4	5	5	5	5	4.8
B.Dere	26	EARTHQUEST INTERNATIONAL LIMITED	1	5	5	1	1	2.6
Korokoro	29	WEAFRI WELL SERVICES	5	5	1	5	5	4.2
Korokoro	30	ELIZAX BLEET NIGERIA LIMITED	3	5	1	1	2	2.4
Gio	31	OILSERV LIMITED	4	5	4	4	4	4.2

B.Dere	32	MOSITO ENVIRON - CONSTRUCT	1	1	1	1	1	1.0
B.Dere	33	CHRISTOHOUSTON ENERGY LIMITED	4	5	5	5	5	4.8
B.Dere	34	DLK OIL & GAS ENVIRONMENTAL SERVICES	5	5	1	5	1	3.4
Korokoro	42	KANNY KOY LTD	5	5	1	3	3	3.4
Aleto Ngofa	43	OTAOILF SERVICES LTD	5	5	5	5	5	5.0
Aleto Ngofa	44	M/S HARRISCO INTERNATIONAL LTD	1	1	1	3	1	1.4
Aleto Ngofa	45	CHAVYN NIGERIA LTD	1	1	1	3	1	1.4
Akpajo	46	ANDELSTA LTD	1	1	1	1	1	1.0
Ogale (Okulu-ebo)	47	LAPIDEO MULTI SERVICES LTD	5	5	5	5	5	5.0
Ogale (Okulu-ebo)	48	SLOT ENGINEERING NIG.	5	5	5	5	5	5.0
Ogale (Okulu-ebo)	49	ENVIRON CONSULT AND REMEDIAL SERVICES LTD	1	1	1	1	1	1.0
Ogale (Okulu-ebo)	50	KLARTEK NIG LTD	1	1	1	1	1	1.0
Ogale (Okulu-ebo)	51	EROTINA NIG LTD	5	5	5	5	5	5.0
Ogale (Okulu-ebo)	52	MONTEGO UPSTREAM SERVICES LTD	5	5	5	5	5	5.0
Ogale (Okulu-ebo)	53	ATLAS-RAY AND SONS COMPANY LTD	5	5	5	5	5	5.0
Ogale (Okulu-ebo)	54	BRANT TECHNOLOGIES LTD	5	5	5	5	5	5.0
Ogale (Okulu-ebo)	55	ADG INTERNATIONAL RESOURCES LTD	5	5	5	5	5	5.0
New Elemenwo	56	AWA ENGINEERING COMPANY NIG. LTD	1	1	1	1	1	1.0
New Elemenwo	57	INTEGRATED CHEMICAL WORKS LTD	1	1	1	1	1	1.0
Overall			3.3	3.9	2.9	3.6	2.7	3.3

Annex 5: HYPREP's Key Performance Index for the Ogoni Clean-Up Project

HYPREP's KPIs
1) Number of contaminated sites and lots successfully remediated/closed out
2) Total volume of soil (m ³) and areas of land (m ²) remediated
3) Number of communities benefiting from HYPREP activities
4) Number of households in impacted communities with improved access to clean drinking water
5) Number of people within impacted communities identified and treated for hydrocarbon pollution related illnesses
6) Number of public awareness campaign on health and environmental issues related to oil-pollution develop and implement a.
7) Number of people within impacted communities provided with new employment and livelihood opportunities
8) Existence of a Centre of Excellence for Environmental Restoration (CEER) to conduct research, training etc ,
9) Establish an "Integrated Contaminated Soil Management Centre" for processing of contaminated materials.
10) Establish security frameworks, protocols awareness and sensitization for project implementation