



COMMUNICATION ON ENGAGEMENT (COE)
AFRICA NETWORK FOR ENVIRONMENT AND ECONOMIC JUSTICE (ANEEJ)
Period covered by this Communication on Engagement From:
February 8, 2022 to February 1, 2024

Part I. Statement of Continued Support by the Managing Director

February 1, 2023

To our Stakeholders:

I am pleased to confirm that the Africa Network for Environment and Economic Justice (ANEEJ) reaffirms its support for the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

This is our Communication on Engagement with the United Nations Global Compact. And we welcome feedback on its contents. In this Communication of Engagement, we describe the actions that the Africa Network for Environment and Economic Justice (ANEEJ) has taken to support the UN Global Compact and its Principles as suggested for an organization like ours. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Rev. David Ugolor
Executive Director
African Network for Environment and Economic Justice (ANEEJ)



PART II: Description of Actions

The Africa Network for Environment and Economic Justice (ANEEJ) is a non-government organization whose goal is to amplify the voice of the weak, the less privileged, and the marginalized groups in society including women, youths, and People Living with Disabilities to increase their participation in the democratic decision-making process. As its basis, ANEEJ believes in a democratic system for managing human interest and operates within two broad focal areas namely environmental and economic justice. Specifically, ANEEJ implements projects relating to governance and democracy, human rights (including migration and development issues) and anti-corruption, peacebuilding and conflict resolution, development effectiveness, and environment including water, sanitation, and hygiene among others.

ANEEJ has been granted Special Consultative Status of Economic and Social Council (ECOSOC) by the United Nations with all attendant privileges and has managed (and still managing) projects funded by many donors including USAID, FCDO, EU, British Council, UNDP/UNODC, McArthur Foundation, OSIWA, the EUY, Royal Norwegian Embassy, Canadian and Swiss Embassies, Heinrich Boel Foundation, Global Green Grant, Action Aid, Open OSIWA, Africa Centre for Energy Policy and Bread for the World, among others.

Vision

Africa without poverty

Mission

To contribute to the emergence of a just and equitable African society through socio-economic and environmental rights protection, institutional strengthening and people's empowerment.

Objectives

The fundamental objectives of ANEEJ are to:

- Create platforms where civil society voices connect into critical masses on key national issues and where/when necessary, advance civil society interest on socioeconomic and environmental rights protection.
- Build the capacity of civil society actors to better appreciate local, national and international economic governance issues and their connection to poverty incidence, resource conflict and the overarching people's economic rights
- Mobilize civil society groups for social action to demand socio-economic rights and good governance at all levels of society.
- Conduct research on key economic governance and environmental issue and to publicize same to inform guided interventions and actions by relevant stakeholders and public agencies.

Head Office: 39 Oyaide Avenue off Benoni Road, GRA, Benin City, Edo State, Nigeria Phone: +2348187674339
Email: info@aneej.org, Twitter: @aneejnigeria Website: www.aneej.org



- Undertake public interest litigation within and outside Nigeria in its core focal areas.

A Description of Practical Actions in Support of the UN Global Compact

In the past one year, ANEEJ has embarked on numerous practical actions through its various thematic areas which include Governance and Anti-corruption, Environmental Justice, and some Cross-Cutting Issues which are in line with the Global Compact Principles of promoting Human Rights, Sustainable Environment, and Fair Labour. Some of the salient activities during the reporting period are outlined below:

Anti-corruption

Corruption remains a major challenge that is hindering the growth and development of Nigeria as it is consistently ranked one of the most corrupt countries or territories in the world as evidenced by several Transparency International's Corruption Perception Index (CPI) reports. The 2023 CPI report indicated that Nigeria scored 25 points and ranked 145 out of 180 countries and territories assessed, indicating a high level of corruption as in the previous reports. Several public institutions in Nigeria are not working effectively to deliver on their mandates to the citizens, this has amplified the corruption situation in the country. The Natural Resource Governance Institute (NRGI) 2019 report on National Oil Company Database shows that almost two-thirds of National oil companies including the Nigeria National Petroleum Corporation (NNPC) exhibit weak, poor, or failing performance on public transparency as measured by the resource's governance¹. ANEEJ National Open Contracting Portal (NOCOPO) compliance ranking report 2020² shows that many MDAs are not publishing procurement data on the Nigerian Open Contracting Portal (NOCOPO) against the directive of the Secretary to Government of the Federation and in line with the Public Procurement Act.

Considering the foregoing, ANEEJ is currently implementing two anti-corruption projects.

1. Enhancing Anti-corruption and Social Inclusive Reforms Initiative in Nigeria project, working closely with eight cluster organisations across Nigeria.
2. Monitoring of recovered asset in Nigeria through transparency and accountability (MANTRA)

Activities

ANEEJ delivered several pieces of training to strengthen the capacity of CSOs and media as advocates to engage governments on anti-corruption and socially inclusive policy reforms at the national level and five (5) oil and gas-producing states in Nigeria.

- The approach used in achieving the above is to Collaborate, Learn and Adapt (CLA). The choice of this approach stems from the fact that traditional confrontational approaches



have not led to reforms in governance in Nigeria. ANEEJ and some of its current cluster members benefited from the SACE project that adopted the CLA approach in building skills development which was deployed in the SCALE project implementation. ANEEJ cluster was involved in the design of this project and there were regular Learning sessions and adaptation of new ideas and innovation as they emerge in carrying out our advocacy activities for inclusive anti-corruption reforms. The tools used to drive our technical approach were Policy Tracker and Outcome Harvester.

- ANEEJ advocated for anti-corruption and social inclusion policy reforms for improved transparency and accountability at the national level and in five (5) oil and gas-producing states by December 2023. ANEEJ reviewed government anti-corruption commitments and engaged the relevant government agencies to push for the implementation of such commitments.
- ANEEJ monitored the utilization of recovered loot in Nigeria through the MANTRA project and provided reports to the Public.
- ANEEJ advocates to policy reforms to strengthen asset recovery regime in Nigeria

On Environment

ANEEJ has established the people's AGM platform in Nigeria. This is an alternative AGM to that of oil and gas multinationals, to discuss the impact of oil exploration activities on the environment and livelihood of the people of Niger Delta and other frontline communities. The first people's AGM was held in Lagos, Nigeria on May 24 2022.

The first people's AGM discussed:

- Shell's energy transition strategy submitted to her shareholders for an advisory vote during the AGM scheduled for Tuesday May 24, 2022
- The impact of shell's operation in Nigeria and other multinational oil companies, particularly, the Niger Delta region
- The role of the Church of England and other shareholders in advancing the operations of shell in Nigeria and other parts of the world

The second people's AGM was held on May 17, 2023 in Abuja, Nigeria. This time to discuss and take resolution on concrete issues affecting the people of Niger Delta and other frontline communities suffering environmental degradation and loss of livelihood due to oil and gas exploration activities. A total of 68 participants from all around Nigeria, including the Niger Delta and other emerging oil-producing States, attended the meeting. The second AGM

- The upcoming SHELL BP's AGM scheduled for May 23rd, Total Energies AGM scheduled for May 26th as well as that of Exxon Mobil scheduled for May 31st, 2023.



- The ongoing Ogoni Cleanup process and host communities' reaction to the exercise
- The activities of multinational oil companies including Shell in the Niger Delta and other parts of Nigeria
- Received and discussed testimonies from indigenous people on the impact of oil exploration activities on the environment and livelihood of the people.
- The lack of political commitment to end gas flaring in Nigeria.
- Update on new oil fields in other parts of Nigeria and other emerging issues

ACTIVITIES

Drafting the Resolution

The draft resolution of the People's AGM was projected on the screen and read aloud. Amendments and corrections were made before it was finally ratified by the whole house and endorsed by the Co-Chairs and the Convener. (See Appendix below)

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Immediate Intervention: Planning for the Rally

It was agreed that a peaceful rally should be carried out on the eve of Shell's AGM on 23 May 2022 in front of Shell's administrative offices and around Lagos Island. #RallyAgainstShell was adopted for social media. The rally would demand that the Church of England and other investors withdraw their moral and financial support from Shell Petroleum Development Company. Twitter and Facebook would be used extensively for the climate justice campaign rally. Banners would be displayed along the chosen routes. Sample polluted water currently available for the host communities' consumption in the Niger Delta would be similarly displayed to show the ongoing human rights abuse and undesirable consequences of Shell's unwholesome operations in that region.

A second rally was also held on 18th May 2023, following the outcome of the 2nd People's AGM, the rally was used to echo the people's resolutions and demands to the Nigerian government, Multinational Oil and Gas Companies and their investors as well as other players in the Oil and Gas Industry locally and internationally. The rally was held in front of NNPC Limited, Nigerian National Oil Company, where the AGM resolution was presented to the leadership of NNPC Limited.

COP27

ANEEJ participated at COP27 in Egypt where it participated in several actions by global civil society organisations. ANEEJ released a [sign-on letter](#) endorsed by Over Eighty (80) Global Civil Society Organisations and Seven (7) leading environmental activists drawn from around the world. Where it called on the Nigerian Government and all Governments supporting Oil and Gas extraction in the Niger Delta to offer significant financing for loss and damages for the people of Niger Delta and other host communities just as they called on investors of fossil fuels to stop

Head Office: 39 Oyaide Avenue off Benoni Road, GRA, Benin City, Edo State, Nigeria Phone: +2348187674339
Email: info@aneej.org, Twitter: @aneejnigeria Website: www.aneej.org



lending moral and financial support to companies that are expanding oil and gas production in defiance of the Paris Agreement.

ANEEJ also participated in COP28 in Dubai, United Arab Emirates. ANEEJ co-organised a side event with Climate and Energy Environmental Defense, Canada titled 'Addressing Oil and Gas sectors Liabilities and Decommissioning in the Energy Transition' on the 5th of December. At the event, ANEEJ's Leo Atakpu presented 'Damages Caused by Oil Companies in the Niger Delta Region of Nigeria.' which was well received by participants who asked clarification questions and made some appreciable comments. The presentation highlighted ANEEJ's work in Nigeria targeting Multinational Oil Companies responsible for environmental devastation in the Niger Delta for decades since the discovery of fossil fuel in commercial quantity in 1958. The presentation also covered ANEEJ's work in targeting the financiers of Shell such as the divestment by the Church of England Pension Board and the Norwegian Oil Fund among others.

ANEEJ joined the global Civil Society on the 8th of December titled "No to false solutions, Debt and Climate." ANEEJ's rep joined the [CSOs action calling for the cancellation](#) of Debt of poor countries to enable them meet their climate obligations to end global warming calling on all creditors to cancel illegitimate debts owed poor countries.

Symposium/training on Oil and Gas extraction and its implication to Host Communities

On November 10, 2022, ANEEJ organised a training/virtual symposium on Oil and Gas extraction and its implication to Host Communities and the environment. The training also assessed the clean-up of Ogoni Land following the UNEP report recommendations. The training involved other key organisations working on the issues such as Stakeholders Democracy Network (SDN), Environmental Rights Action (ERA), Publish What You Pay Campaign – Nigeria, HEDA Resource Centre (HEDA).

Production of Documentary

ANEEJ has produced a documentary to showcase the impact of oil and gas exploration on the environment and the people's livelihood in the Niger Delta. The documentary is being disseminated through ANEEJ social media platforms and was used during COP28. The documentary can be viewed through this link https://youtu.be/_WTE6PIkf-c

Participation at the 10th Conference of State Parties to the United Nations Convention against Corruption – Atlanta, 11th – 15th December, 2023.

At the event, during the GFAR Action Series, ANEEJ presented the MANTRA project success story. This was organized in collaboration with StAR, Switzerland and Nigerian Government. The second side event conducted by ANEEJ in collaboration with Spotlight on corruption on the StAR Asset Recovery Day was on "the compensation of victims of corruption. This was anchored by Dr. Helen Taylor, senior legal researcher from Spotlight on corruption. The presentation was

Head Office: 39 Oyaide Avenue off Benoni Road, GRA, Benin City, Edo State, Nigeria Phone: +2348187674339
Email: info@aneej.org, Twitter: @aneejnigeria Website: www.aneej.org



mainly on the Glencore case and the need for compensation of victims of corruption in Nigeria and Congo.

The last side event conducted by ANEEJ in partnership with East West Management Institute on the NEAT Initiative was on “Exploring Multi-faceted approaches to prevent corruption and enhance accountability. The event took place at the Carter center on the 12th of December 2023.

Reports

ANE EJ produced two major report which were disseminated during CoSPI0 in Atlanta, Georgia. Links to ANEEJ report and policy paper are shown below,

<https://www.aneej.org/wp-content/uploads/2023/11/FINAL-MANTRA-REPORT.pdf>

<https://www.aneej.org/wp-content/uploads/2023/11/Briefing-Paper.pdf>

Press briefings and Articles

ANE EJ also released two press statements and joint briefing during the COSP 10 event namely, “The CSOs react to France Announcement to return \$150 million recovered Abacha loot to Nigeria, “COSP 10 recognition of Nigeria commitment to Beneficial ownership transparency, Asset recovery, big victory for stakeholders -ANE EJ.

“The joint briefing was titled “the harms of Glencore’s corruption in the democratic republic of Congo and Nigeria.

<https://www.aneej.org/cosp10-recognition-of-nigerias-commitment-to-beneficial-ownership-transparency-asset-recovery-big-victory-for-stakeholders-aneej/>

<https://www.aneej.org/the-harms-of-glencores-corruption-in-the-democratic-republic-of-congo-and-nigeria/>

<https://www.aneej.org/csos-react-to-france-announcement-to-return-150m-recovered-abacha-loot-to-nigeria/>

<https://neatinitiative.org/2024/01/10/neat-carter-center-panel/>

HIGH PROFILE BREAKFAST MEETING WITH US GOVERNMENT OFFICIALS

On Thursday December 14, 2023, from 8am – 9:30am (US Eastern), the American Bar Association Rule of Law Initiative (ABA ROLI) hosted a high-profile closed-door breakfast meeting between U.S. Government officials and civil society leaders from countries facing high-risk of corruption on the margins of the Conference of the States Parties (CoSP) to the United Nations Convention against Corruption (UNCAC). The meeting was organized as part of ABA ROLI’s Justice Sector Training Research and Coordination (JUSTRAC) Program in cooperation with the U.S. Department of State Bureau of International Narcotics and Law Enforcement Affairs (INL) and Office of the Coordinator on Global Anticorruption.

Head Office: 39 Oyaide Avenue off Benoni Road, GRA, Benin City, Edo State, Nigeria Phone: +2348187674339
Email: info@aneej.org, Twitter: @aneejnigeria Website: www.aneej.org



The meeting enabled the U.S. government officials to engage civil society leaders from around the world informally and practically as partners in countering corruption as a threat to U.S. national security and international security. It advanced the US Strategy on Countering Corruption objective to strengthen U.S. interagency coordination and engagement with civil society.

ABA ROLI facilitated the discussion which highlighted high risks of corruption in the countries and regions represented, including strategic corruption and state capture. It then focused on how to counter these threats with innovative solutions, including strategies and mechanisms to disrupt corrupt networks that operate transnationally and locally.

Discussion on the issues took place and some issues that came out clearly were;

- The need to promote business integrity.
- The recovery and management of assets for the benefit of the poor and vulnerable who are the victims of corruption.
- ANEEJ presented the NEAT initiative to the US authorities and explained that in a situation where the State is corrupt, the PtP model remain the best option to manage recovered asset and support the work of civil society organisation
- The need for the US government to deploy competent persons who are knowledgeable on global anti-corruption issues to its embassies.
- It was used to share knowledge on anti-corruption issues.
- System strengthening and corruption risk assessment to identify vulnerability and put in place integrity plans to address the vulnerabilities.
- Increased sanctions on corrupt public officials in Nigeria and other high-risk countries
- Electoral reforms and strengthening of democratic institutions

A Measurement of Outcomes or Expected Outcomes

On Anti-Corruption

We have contributed to the emergence of two major anti-corruption laws in Nigeria - the Proceeds of Crime Bill (Recovery and Management) Act 2022 and the Money Laundering (Prevention and Prohibition) Act 2022 which are in line with principle number 10 in the UN Global Compact. These laws have contributed to improving contract transparency allowing genuine businesses to favourably compete.

The other anti-corruption bills which are also in line with the same principle as above - Witness Protection Bill and Whistle-blower Protection Bill had also reached an advanced stage, but some issues were identified that would require re-drafting. Both bills were then sent to the Presidential Initiative on Continuous Audit (PICA) for further work. In December 2022, the Federal Executive Council approved a new Whistle-blower Protection Bill which will soon be transmitted to the National Assembly for consideration and passage.



The anti-corruption cluster secured commitments from the leadership of some government institutions to implement some of the recommendations from the cluster's assessment report. The leadership of Niger Delta Development Commission particularly committed to addressing abandoned projects, getting rid of corruption, issues of inclusion, and consultation with civil society as well as improving the level of transparency and accountability at the commission. In year 2, the cluster will follow up with these commissions to ensure that they are implemented.

ANEEJ report on the utilization of recovered asset in Nigeria has become a reference point globally. The MANTRA project model has been referenced in several publications and it has contributed to knowledge.

ANEEJ conducted three side events in partnership with Star initiative, World bank, Spotlight on corruption institute and East West Management Institute to showcase the MANTRA success story. Through the events, ANEEJ reports were widely disseminated.

The MANTRA final report and policy paper was also distributed to stakeholders present at the side event.

ANEEJ presented statement on Agenda 6: Asset recovery and International cooperation at the plenary

On Environment

Our work of environment and climate justice issues has contributed to influencing some investors in oil and gas companies. For instance, church of England Pensions Board's announced that it would vote against all directors at the upcoming AGMs of Exxon Mobil, Occidental Petroleum, Shell, and Total Energies, in response to their failure to meet climate change objectives.

ANEEJ worked with some members of the people's AGM platform such as the Youths and Environmental Advocacy Centre (YEAC-Nigeria), the Indigenous People's Movement for Self-determination and Liberation (IPMSDL), and the Ogoni Solidarity Forum (OSF), to undertake events to amplify the voice of host communities in the Niger Delta, in November 2023. Over 200 community representatives were mobilized and participated. The [events](#) also included the planting of mangrove trees in Gio community, Rivers State

(a). Resolutions of 1st peoples AGM

In line with **principles 7 and 8** of the Global Compact, the People's AGM resolved as follows:

1. Nigerian oil-bearing communities and citizens who are the victims of Shell and other International Oil and Gas Companies have voted an emphatic "NO" to Shell's Energy Transition Strategy.
2. The Church of England and other investors should stop lending moral and financial support to Shell and should vote against Shell's energy transition strategy at the 24th of May 2022 AGM.



3. We call on the investors to immediately embark on a fact-finding mission in collaboration with civil society actors to ascertain the true situation of Shell's operations in the Niger Delta.
4. Shell should go back to the drawing board and revise the 2021 energy transition strategy to align with the Paris Agreement of limiting the increase in the average global temperature to 1.5 degrees Celsius above pre-industrial levels.
5. Given the inherent dangers of any further investment to the attainment of net-zero targets poses, Shell should immediately commence a process of winding down the process of further exploration of fossil fuel in Nigeria. Increasing investment in oil and gas as evidenced in its current strategy must cease.
6. Shell should cut down emissions at source rather than target nature-based solutions.
7. Key stakeholders driving the cleanup of Ogoni land should do the needful to remove the impediments to actualizing the smooth implementation of the recommendation of the UNEP report.
8. We call on Shell's AGM to commit to a comprehensive cleanup of the entire Niger Delta.

Some of the Resolutions from 2nd Peoples AGM

1. That the Federal Government of Nigeria should appoint a substantive chairman for the Governing Council of HYPREP to ensure consistency in the leadership. Also, the Government, companies and other stakeholders should contribute to the remediation process by supporting the development and adoption of new technologies that can accelerate the Ogoni cleanup. We also call on HYPREP to embark on full-scale livelihood restoration programme for the Ogoni people.
2. There should also be an unbiased investigation into the remediation process in Ogoni land as well environmental and health audits of the entire Niger Delta and a total cleanup of the region.
3. The Norwegian Oil Fund and other investors should follow the example of The Church of England which made a commitment to vote against all directors at the upcoming AGMs of Exxon Mobile, Occidental Petroleum, Shell, and Total Energies, in response to their failure to meet climate change objectives.
4. To conduct further research on the activities of oil companies ongoing in Kogi, Nasarawa, Gombe, and other parts of Nigeria, to promote learning and experience sharing between Niger Delta communities and other parts of Nigeria.
5. The Energy Transition Plan of oil companies should be in compliance with Paris Agreement on climate change and Climate Change Act, reflecting the perspectives of communities affected by decades of fossil fuel extraction.
6. We call on international financial institutions including African Development Bank, The World Bank and Export Credit agencies to discontinue financing fossil fuel projects in Nigeria.



7. The AGM re-stated its earlier call for the companies' major investors to go to the Niger Delta for the fact-finding mission and resolved to undertake high-level advocacy to engage the investors and government currently supporting SHELL, Total Energies, Exxon Mobil and other oil companies in Nigeria. Agreed to send the outcome of the AGM to the major investors of these companies
8. Oil companies including SHELL, Exxon Mobil, Chevron and their investors such as Blackrock, Vanguard, Legal and General Investment management, should take responsibility for loss and damage in the Niger Delta as recommended during COP27.
9. We urge the Federal government, particularly the incoming administration to demonstrate the political will to end gas flaring in Nigeria.

(b). In addition to the resolution that was made a letter was written to the Archbishop of Canterbury, to express how extremely disappointing it was to see how the Church of England Pensions Board was lending its moral and financial authority to Shell and plans to vote for Shell's climate and energy plan at its 2021 Annual Meeting. It was made clear that this is tantamount to endorsing or handing the corporation a right to toy with planetary systems while the poor and vulnerable continue to fight a losing battle against global warming. This letter has since contributed to the Church of England's pension board announcing some tough measures against SHELL. It is now changing focus to the demand side instead of investing in fossil fuel

(c). COP27 in Egypt in November 2022, was used as an instrument to demand increased investment in technologies that will promote climate solutions which are in line with Principle 9 of the UN Global Compact.

COP28 in Dubai was used to showcase ANEEJ documentary which highlighted the plight of Niger Delta Communities.

ANEEJ project campaign issues gained international recognition. The project campaign was reported by euro news as one of the top 5 most [important climate campaigns](#) in Africa to following.

Following ANEEJ engagement with investors, the Church of England, a major investor in Shell and other oil companies, withdrew their investment and accused the oil companies of abandoning climate commitment for short term profit. The Church then shifted investment to the demand side – manufacturing of electric car etc

Following the Peoples recommendation for HYPREP to embark on full scale livelihood restoration programme for the Ogoni people & subsequent engagement with HYPREP, the livelihood program has commenced. Links to report on the programme are presented bellow.

<https://hyprep.gov.ng/mandate/livelihood-programme/>

<https://www.thisdaylive.com/index.php/2023/11/29/ogoniland-hyprep-begins-training-of-over-5000-people-on-sustainable-livelihood>

