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## A Review of the Mandating Role of Government in Corporate Social Responsibility Nigeria

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### **Abstract:**

*This paper contributes to the debate on the role of governments in Corporate Social Responsibility. It is expected in the present-day world that government works in collaboration with corporations as well as civil society to solve environmental and social concerns by creating an enabling environment for CSR to thrive. Accordingly, whereas some are apprehensive that government will employ business collaboration as an excuse to shift their traditional community developmental responsibility, others are of different school of thought. The paper aims to examine the degree to which the Nigerian government has been or is able to promote or hinder practices of CSR in the country. The paper relies on the theoretical conception of the role of government through the lens of public sector roles in bolstering CSR practices. The paper examines the degree to which the government of Nigerian through its agencies and departments has been able to encourage CSR via a mandating role.*

**Keywords:** corporate social responsibility, government, management

### **1. Introduction**

The role of government in the development of corporate social responsibility (CSR) as a concept cannot be over-emphasised in any nation. The government does this by helping to shape an institutional environment that promotes sustainable development. The mandatory role of the government involves the setting up of minimum standards and targets via enacting legislations and the creation of enforcement and inspectorate agencies (Fox, et al., 2002). The degree to which the government has carried out its mandating role in the oil and gas sector will be assessed through the lens of environmental pollution management. The reason has been that host communities placed prominence on the need for oil companies to deal with their negative externalities. The significance of effective environmental management, challenges of legislative frameworks and likely panacea to environmental management issues will dominate discourse in this paper.

### **2. The Mandating Role of Government**

The mandatory role of the government entails setting up of minimum standards and targets via enacting legislations, creation of enforcement and inspectorate agencies, as well as environmental pollution management (Fox, et al., 2002). Environmental protection is an interesting and at the same time contentious issue in the development of contemporary developing countries. As a result of the increasing crisis of environment, development, and concerns of global environmental balance, differing views and standards have been put forward by external governments, international agencies and environmental groups are solving environmental degradation concerns in developing countries (Chokor, 1993). In pre-colonial era, the setting of minimum standards was largely hinged on traditional values and belief systems that determine the sustainable use and conservation of environmental resources. These belief systems forbid the exploitation of specific rare species of plants and animals. A case in point is the people of Oguta of Imo State, located in the eastern part of Nigeria; fishing on the Oguta Lake is done on the fifth day of every month in order not to disturb the water and its goddess, which is still in practice (Chokor, 1993). Similarly, the people of Nembe Kingdom forbid the killing of a specie of python, referred to as 'Adagba' in the local language, is perceived as the deity or god of the kingdom. Furthermore, communal land and family inheritance is discouraged from arbitrary exploitation. Nonetheless, with the commercialisation of land and natural resources, the traditional conservation of land tenure principles has given way to the control of the state. The shift of the traditional environmental management without the incorporation of cultural strategies has impacted negatively on the efficacy of environmental management in Nigeria.

The government of Nigeria over time has enacted laws in response to local and international pressures on environmental protection. For instance, the Federal Environmental Protection Agency (FEPA) Act 1988 (as amended by Act No. 59 of 1992) that established the Federal Environmental Protection Agency (FEPA) was enacted after a newspaper reported that toxic waste from Italy had been dumped inKoko, a remote part of the Niger Delta, in June 1988 (Ogbodo,2009; Ite et al, 2016). The various legislations enacted to address oil and environmental pollution in country can

be divided into two categories in relation to their generality. They are those that deal specifically with oil pollution, and those that deal with pollutants of natural resources less specifically with oil pollution.

Before the Federal Environmental Protection Agency (FEPA) Act of 1988 (Decree 55), legislations on environmental protection in the country were mainly centered on the safety and prevention of economically important natural resources. For instance, the Oil Navigable Water Act of 1968 (Decree 34) prohibited the dumping of industrial oil, crude oil, fuel oil, diesel oil, lubricating oil and heavy diesel oil into the territorial water including inland water of Nigeria. This legislation marks the turning point by the government to legislate and control petroleum pollution and other natural resources. Likewise, the Oil Pipeline Ordinance, which was later changed to the Oil Pipeline Act of 1963, made it compulsory for any pipeline license to adhere to regulations that prevent both land and water pollution. Also, the 1914 Mineral Ordinance that was in operation during the colonial administration was changed to the 1958 Mineral Act, later to the 1963 Mineral Oils (Safety) Regulation and finally to the 1967 Petroleum Regulation. The environmental policy in Nigeria's oil sector entered another phase with the coming into effect of the 1969 Petroleum Act Decree 51 (Orubu et al, 2004). It improved the Oil Pipeline Ordinance of 1936 and the Oil Pipeline Act of 1963; the enactment saddled the petroleum minister with enormous powers to make regulation with regards to all aspects of petroleum matters and the protection of the environment. Though, until 1988, there were no laws of toxic waste, industrial waste or institutional structures in the country with a mandate to deal with environmental concerns. Therefore, coming into effect of the Federal Environmental Protection Agency (FEPA) Decree 1988 was a significant milestone in the development of environmental policy in country. The 1988 decree empowers FEPA to prescribe national environmental guidelines, set criteria and standards for air quality, noise, level, water quality, and gaseous emissions limit. It has the duty to monitor, control and supervise toxic substances, and to enforce compliance with the provision of the Act. The Decree empowers the agency to gain access into premises even without warrant to inspect, confiscate, and arrest whosoever thwarted enforcement officers in carrying out their statutory duties or make untrue claim of compliance. In order to successfully deal with its policy, thrust, the agency came up with the first comprehensive National Policy on Environment (NPE) in 1989.

Project implementation is the second strategy to oil pollution management, this strategy focused largely on monitoring, control and cleaning of oil spills. Project implementation strategy came to the fore in that environmental regulations expected oil companies to have an integrated oil spill infrastructure as well as a logical policy framework for clearing oil spills when they occur. In Nigeria, there are two principal governmental agencies that are directly saddle with the responsibility of environmental protection and enforcement of environmental laws. First, is the Department of Petroleum Resources (DPR), the mandate of the agency includes, "enforcing safety and environmental regulations and ensuring that those operations conform to national and international industry practices and standards". In line with its mandate, DPR instituted the 'Environmental Guidelines and Standards for the Petroleum Industry (EGSPI) in 1991', which was later reviewed in 1998. The original EGSPi guidelines set the basis for the enactment of other vital environmental legislations like the Environmental Impact Assessment (EIA) Decree 1992. Adherence to the EIA decree constitutes an essential aspect of corporate environmental responsibility that oil companies are expected to deal with. Second is the Federal Ministry of Environment which absorbed duties of FEPA in 1999. Its main mandate is to protect and enhance the quality of water, air, land, forest and wildlife in Nigeria as enshrined in Section 20 of the Nigerian Constitution. The main policy thrust of the ministry is enshrined in the Environmental Renewal and Development Initiatives (ERDI). The Environmental Renewal Development Initiatives is formed to take inventory of natural resources, assess the magnitude of environmental degradation, design and implement restoration of measures to stop further degradation of the environment (Ministry of Environment Web). In order to effectively implement the mandate of the ministry, a number of priority initiatives were advanced to deal with waste management and sanitation, industrial pollution control - oil spill and gas, conservation of biodiversity and afforestation. While one agency operates for the oil and gas sector, the other regulates the other sectors of the Nigeria's economy. This simply implies that both agencies would have different sets of environmental criteria and standards with significant implications for an effective environmental management (Offiong, J.O, 2011).

The Federal Government, in an attempt to institutionalise CSR practices in the country, sent a Corporate Social Responsibility Bill in 2008 to the National Assembly. The aim of the Bill is to enact an Act for the establishment of a Corporate Social Responsibility Commission. Part of the Bill states that the Commission will be given the task of ensuring that companies are accountable not only to employees but to business investors, consumers and the external business environment and to develop environmental guidelines that companies need to comply with in doing business in the country. Likewise, among other vital concerns, the Commission when established will be vested with the powers to discharge a variety of functions, such as creating a standard for social responsibility of companies consistent with international standards and practices and implementing social and environmental regulations (Offiong, J. O. 2011).

### **3. Strength of the Mandating Role of Nigerian Government**

The government of Nigeria to an extent has been able to deal with its mandating role with regards to criteria and standard setting in the oil sector. The institution of some environmental laws and statutes that complement each other are pointers to this achievement. Nigeria's environmental laws can be comparable to those of Western Europe and North America (Hara, 2001). Furthermore, the reason has been that Nigeria is a signatory to international environmental regimes like the Montreal Protocol, Basel Convention, as well as the Kyoto Protocol indicate that the government is alive to its mandatory role, since CSR is about adhering to the laws of the land. For instance, evidence that support Nigeria being alive to her standard-setting obligation is the speed at which the Oil and Gas Bill in 2004 was passed. The Oil and Gas Act of 2004 among other things stipulate the social responsibility of oil companies operating in the country (Aziken, 2004). In addition, some of the bills that were recently ratified by the government of Nigeria, such as the Labour Standard Bill, Institutional Bill, Employee Compensation Bill, Collective Labour Relations Bill, and Occupational Safety and Health Bill are

all pointers that the Nigeria's government is gradually responding to its role of setting standards, but also in other CSR related issues. For instance, the Employee Compensation Bill (ECB) abolished the Worker's Compensation Act (WCA) of 1990 by enhancing the system of compensation in accordance with best practices in labour administration. The ECB centers on areas like compensation for injury or disease at work, compensation for mental stress, vocational rehabilitation for injured employees, death, establishment of employees' compensation funds as well as the management of employee compensation fund (Komolafe, 2006). In the same vein, the Occupational Safety and Health Bill, which annul the Factory Act of 1990, expands the scope of the Occupational Safety and Health Bill to all workplace in all sectors of the Nigerian economy. The Occupational Safety and Health Bill stipulate the basic requirements of occupational safety and health that must be adhered to in all workplaces across the country. It also develops and encourages the use of occupational safety and health standards, such as occupational hygiene in keeping with best practice. The significance of these bills emanates from the fact that incidences at places of work across the country are given rise to avertible loss of workers' lives, damage of factories and closure, job losses, and insufficient worker compensation in case of accidents. These incidences have weakened the country's capacity to attain the Sustainable Development Goal that emphasizes the elimination of poverty and hunger (Komolafe, 2006).

#### 4. Limitations of the Mandating Role of the Nigerian Government

Nevertheless, the success of the different environmental legislations and agencies, in line with ameliorating oil companies' environmental performance and sensitivity to community environmental issue is still to a large extent inadequate. A critical analysis of environmental management in Nigeria suggests a number of problems associated with its practice. First is the inherent weakness in existing laws and its deficiency to effectively protect indigenous rights. It is argued that the laws are not only vague but penalty for those who circumvent them is not clearly spelt out (The Guardian, 2005, Ite, E. et al. 2016). This deficiency of oil spill management policies in the country is proved by the fact that such policies are in most cases not lucid beyond the recovery of oil spilled in the environment. The vagueness of these laws implies that they are subject to all sorts of abuses. This has also exacerbated the burden of proof communities need to secure compensation in times of oil spills and allowed oil companies to deny their negative impact on the community. The challenge of lack of environmental statutes is again compounded by the fact that, the Nigerian government has not made serious attempts to compel or direct oil companies to accept direct liability for damage meted to the environment and communities, where oil exploration is carried out. For instance, Frynas (2000) suggested that in spite of controversies surrounding issues of compensation between oil companies and host communities, which is considered a prominent source of conflict, particularly in the Niger Delta; yet Nigeria has not come up with a comprehensive legislation that addresses compensation. As such, whereas there are legal provisions that allow for compensation of damaged personnel properties, fishes, crops, as well as wildlife conservation, claims of compensation are often dismissed as not genuine or sabotage, hence inadequate compensations are paid, or in worst scenarios compensations are not paid. Frynas, (2000) also argued that the narrowness of oil pollution legislation in the country means compensation payments only deal with the economic value of damages, while disregarding the environmental impact, health and psychological damage to members of the community as well as loss of expectation by members of the community. Furthermore, whereas limited punishments are imposed on oil companies directly for protection and restoration of the ecosystem, the government of Nigeria has come up with stern measures to curtail the incidence of sabotage. Some of such measures are the enactment of Petroleum Production and Distribution Anti- Sabotage Decree 35 of 1975 and the Special Tribunal Decree 20 of 1984. The Decree provided the initial punishment for those found culpable of oil infrastructure sabotage was death penalty, but owing to public outcry, punishment was later reduced to life imprisonment. It suffices therefore to argue that as a result of the differential treatment of host communities and oil companies by the government, the environmental statutes and broad policy goals of the country are skewed in favor of oil companies. This argument was supported by Frynas (2000); the author argued that the legal system of Nigeria is biased in favor of the state and oil companies at the expense of oil producing communities in the Niger Delta.

Another major problem that has bedeviled the environmental management system in the oil sector of Nigeria is the issue of implementation and enforcement of regulations. Although, Nigeria has innovative environmental regulations, but the implementation and enforcement of these regulations are weak or non-existent. This challenge is common in most developing countries, but in Nigeria it has almost become an institutional norm owing to lack of institutional and technical capacity, poor funding of regulatory agencies, poor community participation, duplication of responsibility, as well as bureaucracy. This has weakened the capacity of regulatory agencies like the Federal Ministry of Environment and the Directorate of Petroleum Resources (DPR) to effectively monitor and ensure adherence to regulatory statutes in the oil and gas sector. The failure of regulatory agencies meant that oil companies now report underestimated or inaccurate quantity of oil spills and in some cases, oil spills go unreported (Moffat and Linden, 1995).

The technical and institutional capacity of DPR with regards to human capacity is grossly inadequate. The motivation and morale of oil companies' employees are often poor owing to lack of professional and financial incentives. This is further compounded by staff not only lacking the technical knowhow but also lacking tools to effectively discharge their duties. For instance, officials of regulatory agency face the challenge of regular access to companies' facilities, particularly in the mangrove swamp of the Niger Delta to monitor and enforce compliance.

In the same vein, state ministries of environment and DPR in Nigeria lack well equipped and modern scientific laboratories to carry out soil and water sample tests as well as analysis in times of oil spill. They also lack the capacity to establish that oil companies in Nigeria are conforming to national minimum standards in their everyday undertakings. As a result, these agencies have depended on oil companies to determine the quantity of oil spills, and to undertake sample test and analysis to determine the degree of oil spill damage to the ecosystem. This ugly situation periodically allows for a

conflict of interest amongst stakeholders in the oil industry. According to Egbu (2000), owing to the absence of laboratories in the major oil producing states in Nigeria, regulatory authorities often request oil companies to provide soil and water analysis in the event of an oil spill.

Furthermore, the lack of professional and financial incentives often leads to corruption of officials of regulatory agencies by powerful forces within the oil industry. A case in point is the Halliburton bribery Saga. Halliburton recently admitted that it paid bribes worth US\$2.4 billion to some officials of government to evade tax regarding its activities in Nigeria (Cason, 2003). Likewise, an American and an erstwhile staff of Wilbros Group, Inc., Mr Jim Brown admitted in an American court that he bribed some staff of the Nigeria National Petroleum Corporation (NNPC) to retain jobs, contracts and secure tax cuts (This Day, 2006a). These incidences of bribes have weakened the capacity of most regulating bodies and officials to effectively undertake their jobs.

Another serious concern in the oil industry is poor community participation in the design and implementation of environmental policies. For instance, the Environmental Impact Assessment (EIA) Decree 86 of 1992 made, while it is mandatory for projects exceeding 50 kilometers and those close to human settlements to undergo environmental impact assessment, there is little or no provision for community participation. The failure to allow for full community involvement has created the negative impression that government commitment to ecological protection in host communities is empty talk. For instance, MrEkpo James, an indigene of Effiat community in Mbo LGA, stated that:

*"Not only have a good number of EIA reports carried out without community input but such reports are often skewed in favor of the oil companies. Also, oil companies and government officials collude to give EIA reports that are not adequately verified by officials of government before they are validated"* (Ekpo, 10 April, 2016).

Furthermore, there are cases where projects would have started before effort was made to undertake an EIA, just to give the public an impression that oil companies operate without any form of control. The problem of poor enforcement of environmental legislation has as well been because of poor funding of regulatory agencies, inadequate investment in environmental protection by the government and serious bureaucratic bottlenecks as a result of the duplication of duties as well as contradictory jurisdictions of the different regulatory bodies. Egbu (2000) argued that government's seeming reluctance to enforce compliance of environmental laws in the country is due in part to the fact that sometimes authorities of these agencies are not well defined. In other instances, duplication of functions not only allows for the inefficient application of scarce resources but the minimum environmental standards or best practices is compromised. Egbu (2000) also pointed out that there are instances where DPR has validated EIA reports submitted by oil companies, only to be jettisoned by FEPA because of non-compliance to minimum standards or best practices. This challenge also affects other areas of the oil and gas sector of Nigeria. For instance, Nigeria National Petroleum Company (NNPC) and Directorate of Petroleum Resources (DPR) gave varying report about the installed capacity of the Port Harcourt Refinery. Whereas NNPC recently maintained that the Port Harcourt refinery was operating at 90% of its installed capacity, on the other hand, DPR report suggests the contrary (Ubaka, 2006). It suffices therefore to state that, there is the challenge of inter-agency rivalry as against inter-agency cooperation and synergy. This unnecessary inter-agency competition has not only hampered on inter-organisational learning and information sharing but has affected the effective enforcement of ecological legislation.

Additionally, paucity of funds and deliberate attitude of erstwhile managers of the Directorate of Petroleum Resources (DPR) to allow bureaucracy to becloud their sense of judgment simply implies that, DPR is short of being an effective regulatory organ. The underfunding of critical organ such as DPR is a clear indication of the poor state of government investment in ecological protection. Chokor (1993) revealed that governmental ecological outlay on protection come to only 1.6% of government's overall annual budget expenditure. The narrative here is that, critical government organs such as the Directorate of Petroleum Resources run on a slim budget, for this reason the agency is not efficiency and effectiveness managed.

Another major challenge with environmental management in the oil sector is the rentier status of Nigeria. The over-reliance on oil export as the predominance source of revenue means, any attempt by government to strictly sanction oil companies over oil environmental regulation would amount to the government shooting itself in the leg since oil companies in Nigeria operate under joint-venture agreements. The cost of operations of all joint-venture partners are jointly financed based on the equity shares held by partners. Since the government of Nigeria controls majority of the equity stakes in the oil sector, it is natural from the foregoing that, she bears a majority share of the cost of any sanction. The rentier-state status implies that oil revenue has become the mitochondrion of government existence, and as such its broad policy goals are mostly in the direction of reducing economic losses in the form of oil revenues without a proportionate emphasis on ecological protection. This partly elucidates weaknesses in ecological legislation, enforcement, as well as penalties for circumventing ecological regulations. This was supported by Ikporkpo (2009) he stressed that given the preponderance of crude oil to the Nigerian economy, slackness in the enforcement of environmental legislations might be an intentional policy of government to stimulate foreign direct investment (FDI) in the oil and gas sector of the economy. In similar vein, Frynas (2000) maintained that FEPA's environmental standards were design in a manner that the oil industry could comply to them without incurring any serious extra costly measures. For example, the implementation of the Associated Gas Re-injection Act of 1979, which was later, amended in 1985, was promulgated with a view to minimising gas flaring. The old Act of 1979, required oil companies to re-inject gas into the earth and to provide an in-depth programme for the utilization of gas. The Act as a well-set penalty for violation of gas flaring laws and specific timeline to ending gas flaring in the country. Nonetheless, in practical terms, these legislations have made insignificant impact on oil companies' everyday activities, as gas flaring remains undiminished. The persistence of gas flaring and the continued changes in the timeframe to ending gas flaring in Nigeria is a clear indication of the weakness in the enforcement of ecological legislations. This can be attributed to a number of reasons. The first reason is the inability of the

government to come up with an appropriate gas utilization plan. The second reason is the unwillingness of the government to bear the cost burden of ending gas flaring; hence almost all oil companies were given exemption for economic and technical reasons. The third reason is the insignificant rates of fines oil companies were to pay for violating gas flaring legislations. Oil companies consider paying fines more economically rational to continue gas flaring, as against complying with the provisions of gas flaring regulations. For instance, Chevron maintained that adherence to the Gas Re-injection Decree would cost the company as much as US\$56 million, when compared to a meager US\$1 million annually that it would have to pay in fines for gas flaring. In essence, gas flaring was considered by the company a cheaper option (Frynas, 2000).

## 5. Conclusion

In an attempt to mitigate some of these challenges highlighted above, the government of Nigeria has made some institutional rationalization to allow for better monitoring and enforcement of environmental regulations. For instance, the Directorate of Petroleum Resources' eight divisional structures have been rationalized to five major departments. Three Core Divisions of Downstream, Upstream and Gas will consist its regulatory and monitoring functions, whereas two Services Departments of Corporate Services for Internal, and Technical Services for External and Third Parties will serve as support service providers. The major reason for this rationalization was to prevent the duplication and multiplicity of functions as well as incoherent responsibility specification that characterised the former (NNPC Web, DPR Web). Furthermore, to deal with the problem of weak institutional capacity of DPR, the Government advertised and recruited a number of graduates with specialist skills needed to strengthen DPR's manpower. Also, two additional offices were created to expand the reach of the agency and to complement the existing five zonal offices. With regards to building of technical capacity, the agency had shifted from an analogue database to digital state of the art platform that allow DPR to perform its functions more efficiently (This Day, 2006b). The discussion and analysis given above imply that undoubtedly the Nigerian Government has made or is making significant attempt to deal with its mandating role but serious commitment for oil pollution management and enforcement of regulations is yet to fully emerge, this is, largely to the advantage of oil companies operating in the country. The despicable environmental degradation in the Niger Delta region is an indication of failure of regulatory institutions in the country (Vanguard, 2006).

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