



CHIEF OLEPHIRI FRANKLIN IGOMA (JP) UWEMA (PARAMOUNT RULER) AMINIGBOKO COMMUNITY

AMINIGBOKO COMMUNITY
EMUGHAN DISTRICT
ABUA/ODUAL L.G.A
RIVERS STATE

C/o The Secretary to The Palace
Ipah Royal House,
Akiro Family
Aminigboko, Abua
Tel: 08056050981
Email:
uwemaaminigbokopalace@yahoo.com
uwemaaminigbokopalace@gmail.com

Our Ref: UAP/ACA/02/JUNE2022

Your Ref:

Date: 7th June, 2022

Attention: Katharine Booth
Interim OECD Watch Coordinator and SOMO Researcher
OECD Watch Secretariat c/o
Stitching Onderzoek Multinational
Ondernemingen
Center for Research on Multinational Corporations
KNSM – laan 17
1019 LA Amsterdam, The Netherlands

Dear Madam,

RE: Failure of Daewoo Nigeria Limited to Obey International Best Practices & The OECD Guidelines While Instigating a Crisis in the Akiro Family/Ogbolo Family and Aminigboko Community in Emughan Clan of Abua Odual Local Government Area of Rivers State, Nigeria Due to Sitting of Fabrication Yard and Construction of Enwhe East & Enwhe West Manifolds for Shells Enwhe Field Development Project – Gbaran Phase 3.

Appeal for Urgent Intervention & Mediation in Order to Ensure Proper Policy Implementation and to Avert Further Breakdown of Law and Order.

Aminigboko Community Rulership/Leadership (via the Uwema Aminigboko Community-Chief Olephiri Franklin Igoma (JP) comment on the Korea National Contact (KNCP) termination of mediation process and rejection of Specific Instance (complaint)).

1. PREAMBLE

Following your email dated 21st May, 2022 requesting Aminigboko Community rulership/leadership comment on Korea National Contact Point (KNCP) conclusion/termination of mediation process involving Aminigboko Community versus Daewoo Nigeria Limited/Daewoo E&C contained in the Initial Assessment of the Complaint under the OECD Guidelines concerning Natural Gas Facilities in Nigeria dated 28th September, 2021 released by KNCP and excerpt published on the OECD watch database.

Chief Olephiri Franklin Igoma (JP)
Uwema Aminigboko Community-Abua
08073456996

Chief Memoye Sunday Igoma
Acting - Oola-Eghun Akiro

Chief Godpower Akari
Ag. Chief Thankyou Wariboko Akari
Oola-Eghun Ogbolo

Oola-Eghun Ukwo

Chief M.B. Osila
Oola-Eghun Atian

2. AMINIGBOKO COMMUNITY RULERSHIP/LEADERSHIP CONSULTATION/ ASSESMENT / PROCEDURE TO FILE A COMPLAINT

Aminigboko Community rulership/leadership after due consultation reviewed the activities of companies executing the Shell's Enwhe Field Development Project – Gbaran Phase 3 in Aminigboko Community and we believe Daewoo Nigeria Limited has breached the OECD Guidelines for Multinational Enterprise in their operations of sitting Fabrication yard and Construction of Manifolds in Enwhe East/Enwhe West. As a result, this project has negatively impacted our peaceful co-existence, cultural and traditional systems, our human rights, families/communities existing interface structure, our fundamental labour rights, and have destroyed our sacred/heritage site, etc. **The who, what, when, where and why of filing a complaint/how to file a complaint outlined in a guide to the 2011 OECD guidelines for Multinational Enterprises (OECD Watch) was followed accordingly.**

3. AMINIGBOKO COMMUNITY RULLERSHIP/LEADERSHIP FILED SPECIFIC INSTANCE

Aminigboko Community Emughan Clan in Abua Odual Local Government Area of Rivers State, Nigeria filed Specific Instance against Daewoo Nigeria Limited and Daewoo E&C by Uwema (Paramount Traditional Rules - Aminigboko Community – Chief Olephiri Franklin Igoma(JP) for and on behalf of the Chiefs, Council of Chiefs & Elders, Community Development Committee on failure to obey international best practices & the OECD Guidelines, inciting/instigating crisis due to sitting of fabrication yard and construction of Enwhe East/Enwhe West Manifolds for Shell Enwhe Field Development Project Gbaran Phase 3. Aminigboko Community rulership/leadership appeal for urgent intervention & mediation of the Korean National Contact Point in order to ensure proper policy implementation and to avert further breakdown of law and order.

The Specific Instance was filed on 21st December, 2020, find attached **appendix 1**. On 23rd January, 2020 KNCP acknowledge specific instance and request it to reforwarded in particular version. The requested KNCP format was sent on 5th January, 2021. OECD published specific Instance on its case index on 6th January, 2020.



4. KOREA NATIONAL CONTACT POINT (KNCP) INTERFACE WITH AMINIGBOKO COMMUNITY RULERSHIP/ LEADERSHIP ON SPECIFIC INSTANCE MEDIATION PROCEDURE AND INTRIGUE TO TERMINATE PROCEEDING

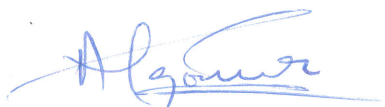
Following the specific instance filed, the Korea National Contact Point (KNCP) interfaced with Aminigboko Community rulership/leadership requesting for response following defense, denials / counter claims leading to clarification and provision of more documentary proofs, affirmation and counter claims from complaint for the periods and dates chronicled in the Uwema Aminigboko Community letter dated 19th October, 2021 reference number UAP/ACA/01/OCT 2021, please find attached **appendix 2**. The KNCP interface includes the request for Good Offices offers, which was accepted by the Notifying party via a letter dated on 25th January, 2021,

The KNCP released “Letter of sending first assessment only in Korean Version and promised to forward English version for reference” on 1st of October 2021 **appendix 3**. On 20th October, 2021 Aminigboko Community rulership/leadership requested for English version/further instruction from KNCP. On 21st October, 2021 replied that Korean translation in progress, Korean version is provided as official original and English version is made for reporting OECD and will be published for convenience.

Aminigboko Community rulership/leadership expressed our concerns on suspension of mediation process, decline to forward English Version of Initial Assessment, among others in a letter dated 14th December, 2021 reference number UAP/ACA/04/DEC2021 addressed to KNCP, please find attached **appendix 4**.

On 20th December, 2021 KNCP replied with the attached English version (three months after release of Korean version) dated 28th September, 2021 titled **Initial Assessment of the Compliant under the OECD Guidelines concerning Natural Gas Facilities in Nigeria**, please find attached **appendix 5**. KNCP commented on the Email that the Korean version is the original and this English translation as provided just for our information. The KNCP terminated the mediation process/proceedings between Aminigboko community versus Daewoo Nigeria Limited and Daewoo E&C in the Initial Assessment of the Complaint published dated 28th September, 2021.

Aminigboko Community rulership/leadership dissatisfied with the Korean National Contact Point(KNCP) termination of mediation process/proceedings between Aminigboko Community versus Daewoo Nigeria Limited and Daewoo



E&C by declining to consideration of issues/ factual documents/submissions by complainant, without room for correction of factual errors before publication wrote the KNCP in a letter dated 18th January, 2022 reference number UAP/ACA/02/JAN20221 to express our concerns and request for **FURTHER REVIEW** of mediation process by KNCP, please find attached, **appendix 6**. Unfortunately, no response till this day.

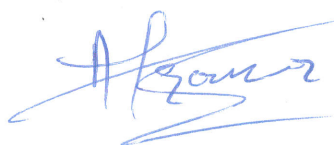
5. ALLEGED OECD VIOLATIONS BY DAEWOO NIGERIA LIMITED/DAEWOO E&C

Daewoo Nigeria Limited activities in Aminigboko Community in course of sitting the Fabrication Yard and Construction of Manifolds in Enwhe East (the land of Ogbolo Family) / Enwhe West (the Land of Akiro Family) we alledged breached the OECD Guidelines on human right, labour and industrial relations, environmental protection, information disclosure, consumes interest, combating bribery and extortion, general policies, concept and principle we so alledged. **We request the KNCP to make assessment of the facts and circumstances and determine whether the OECD Guidelines have been breached by Daewoo Nigeria Limited.**

6. CROSS SECTION OF MYRIADS OF EVIDENCE (DOCUMENTS/PICTURES) OF VIOLATIONS

Chronicle below are a cross section of documents/pictures to back our claim submitted KNCP:

1. Solicitors for the Akiro Family letter to the Manager, Daewoo Nigeria Limited, Daewoo E&C DN-65 dated 19th February, 2019 reference number UW/CG/2019/014 – Notice of family land ownership thereof, **appendix 7**.
2. Pictures of Forceful occupation of the land of Akiro family, destruction of properties, desecration and destruction of heritage site by Daewoo Nigeria Limited under heavily armed security, **appendix 8**.
3. Ogbolo Family letter to Daewoo Nigeria Limited dated 26th May,2020 protesting forceful entry into the land of Ogbolo family (Enwhe East) without engagement/consent, **appendix 9**.
4. Pictures of vandalization of properties worth millions at the venue of sensitization/skill training organized by Aminigboko Community in conjunction with Skill Associations/Professionals in the area/offices by youths working to protect Daewoo Nigeria Limited interest under the cover of military station at the fabrication yard, **appendix 10**.
5. Daewoo Nigeria Limited Constructed a barrow pit of over twenty feet by ten feet and fifteen feet deep, and decline to disclose chemical content deposited



in the pit/status of ground water, without mitigation, thereby endangering the lives of our people who depend on water well as source of drinking, **appendix 11**, among others.

6. Daewoo Nigeria Limited institute parallel leadership structure in Akiro family and financing legal matter against the incumbent Chief/Head of Akiro family at the instance of the forceful entry into the land of Akiro family for fabrication yard/manifold construction, pending suit process attached, **appendix 12**, among others. **Dozzies of documents on the issues submitted to KNCP.**

7. PUBLICATION OF INITIAL ASSESSMENT WITHOUT INPUT (CORRECTION OF FACTUAL ERRORS) FROM AMINIGBOKO COMMUNITY RULERSHIP/LEADERSHIP.

The Initial Assessment of the Complaint under the OECD Guidelines concerning Natural Gas facilities in Nigeria published by the Korea National Contact Point (KNCP) did not give room for Aminigboko Community rulership/leadership to respond on Factual Errors before publication. Hence, there was no notifying parties' input before the publication.


8. INITIAL ASSESSMENT OF COMPLAINT UNDER THE OECD GUIDELINES CONCERNING NATURAL GAS FACILITIES IN NIGERIA

Response/comments to No. 5 Assessment of Factors:

1. **The identity of the party concerned and its interest in the matter:** Chief Olephiri Franklin Igoma (JP) – Uwema (Paramount Traditional Ruler) Aminigboko Community for and on behalf of the Chiefs, Council of Chiefs & Elders and the Community Development Committee being the incumbent has the right to represent Aminigboko Community. Please find attached, **appendix 13 (ADDEDIDUM 1)**.

There is no pending litigation against the incumbent Uwema (paramount traditional ruler) Aminigboko Community regarding authorized representative of the Aminigboko Community in any law court in Nigeria, be it Customary Court, Magistrate Court, High Court or Supreme Court, **and no proof to the contrary from KNCP in course of mediation.**

2. **Whether the issue is material and substantiated:**



This is the prerogative of Korean national contact point (KNCP) to determine if the issue is material and substantiated and the responsibility of the Aminigboko community rulership/ leadership (complainant) to provide material /document/ pictural, etc. evidence to corroborate our complaint.

The complaint hinges on the breached OCED guidelines on human right, labour and industrial relations, environmental protection, information discloses, consumers, interest, combating bribery and extortion, general policies, concept and principle, we alleged. **The who, what, when, whose, and why of filing a complaint according to the OCED guidelines (OECD Watch) was considered before the specific instance was filed against Daewoo Nigeria limited and Daewoo E&C.** Chief Olephiri franklin Igoma (JP), Uwema (Paramount Traditional Ruler) Aminigboko community is eligible. He filed for and on behalf of the Chiefs, Council of Chiefs, and the Community Development of Committee (Community Development Committee is duly registered with the Ministry of Chieftancy and Community Affairs ,Rivers State – please find attached certificate of registration ,appendix 14)

There are no pending court matters in Nigeria on right of representation exercise by the incumbent Uwema Aminigboko Community – Chief Olephiri Franklin Igoma (JP) as Falsely alleged. None in the Customary Court, Magistrate Court, High court or Supreme Court, **which was used as a basis for termination of mediation proceedings**

KNCP / Daewoo Nigeria limited and Daewoo E&C decline to show documentary proof.

3. Whether there seem to be a link between the enterprises activities and the issue raised in the Specific Instance:

KNCP reference document: Shell Global Memorandum of Understanding (GMOU) & Aminigboko Community among others cluster communities was cosigned by Chief Olephiri Franklin Igoma (JP) – Uwema (Paramount Ruler) Aminigboko Community agreement for the ongoing project - Enwhe Field Development Project – Gbaran Phase 3. Also, the nomination of community Trust (CT) list/authorized representation of Aminigboko Community submitted by the Uwema Aminigboko Community, please find attached **appendix 15/15a.**

Daewoo Nigeria Limited breached the said GMOU agreement and the Community Trust (CT) representatives it referred to and appointed a parallel leadership structure / illegal representative and imposing same onto Aminigboko



community. Daewoo Nigeria limited use the said illegal interface to awards community content contracts worth billions of naira meant for Aminigboko community to third parties. **This is worth consideration by the KNCP, the said GMoU is the agreement is the working document for the Enwhe Project that Daewoo Nigeria Limited is executing.**

4. The relevance of applicable law and procedures, including court rulings:

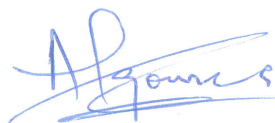
Aminigboko Community rulership / leadership and Ipah Royal House, Akiro family affirm that there is no pending court proceeding on the power of representation of Aminigboko Community in any court in Nigeria against the incumbent Chief Olephiri Franklin Igoma (JP) – Uwema (Paramount Traditional Ruler) Aminigboko community be it in the Customary court, Magistrate court, High court, or Supreme court in Nigeria.

Aminigboko community rulership/leadership and Ipah Royal Family demand Korean National Contact Point (KNCP), Daewoo Nigeria limited and Daewoo E&C to show proof else the public is being misinformed. **Our insistence on this subject matter which KNCP relied upon to take FIAT DECISION is worth due diligence and consideration of the KNCP.**

5. How similar issues have been, or are being treated in other domestic or international proceedings:

Aminigboko Community Rulership/Leadership duly followed Step2: Assess the feasibility of the complaint contained in How to file complaint of the guidelines prior to filing the separate Specific Instance against Daewoo Nigeria Limited/Daewoo E&C. Daewoo Nigeria Limited not a subsidiary of Shell Petroleum Development Company Nigeria Limited.

The complaint against Daewoo Nigeria limited / Daewoo E&C chronicled in the Specific Instance filed on 24th December, 2020 (appendix 1 refer) contains OECD alleged violations carried by Daewoo Nigeria limited. The Specific Instance filed on 16th May, 2019 against SPDC/Shell HQ submitted to the Dutch NCP reflects OECD alleged violations by SPDC and its contracting companies. However, there are joint alleged OECD violation by SPDC and Daewoo Nigeria Limited in course of executing the Enwhe project in Aminigboko Community.



The Dutch NCP offers good offices mediation for parties (Aminigboko Community versus SPDC/ Shell HQ), Aminigboko community accepted while SPDC/ Shell HQ declined. KNCP requested the offer of good offices mediation for parties (Aminigboko Community versus Daewoo Nigeria Limited/ Daewoo E&C). Aminigboko community accepted the offer of good offices while KNCP decline information on Daewoo Nigeria Limited/ Daewoo E&C whether it accept or not. **Hence, no transparency.**

6. Whether the consideration of the specific issues would contribute to the purpose and effectiveness of the guidelines:

Aminigboko Community re-affirm no pending litigation in Nigeria court on the power of representation of the community. **KNCP decline to show proof provided by Daewoo Nigeria Limited.**

Reference to comment in NO5 of Assessment on Factors, above. Owing to difference in alleged violation and Daewoo Nigeria Limited not a subsidiary of Shell Petroleum Development Company Nigeria limited. **The decline of SPDC/ Shell HQ of good offices offer by Dutch NPC should not determine Daewoo Nigeria limited / Daewoo E&C decision making.** KNCP decline to refer to the OECD guidelines how this applies , to the complainant.

Daewoo Nigeria limited claim that it has established and implemented capacity building compensation and employment of local residents through consultations with representatives of Aminigboko Community is NOT TRUE and does NOT EXIST. Aminigboko community could not have filed Specific Instance against Daewoo Nigeria limited/Daewoo E&C.

9. OUR OBSERVATION

Aminigboko Community Rulership/Leadership observed with dismay that the Korean National Contact Point (KNCP) in course of preliminary assessment ABANDONED the ISSUES contained in the Specific Instance filed against Daewoo Nigeria Limited/Daewoo E&C that is negatively impacted our peaceful co-existence, cultural and traditional systems, our human right, community existing interface structures, fundamental labour right, environment, our livelihood, our community content benefit associated with the Enwhe project, our sacred and heritage sites and threats to lives and property, etc. and DWELL on who is eligible to file a complaint only. **The fact remains that we alleged Daewoo Nigeria Limited established parallel leadership structures in Aminigboko Community.**



The incumbent Uwema Aminigboko Community Chief Olephiri Franklin Igoma (JP) is in charge of the day- to – day running of Aminigboko Community. The age - long traditional governance structure and conventional mode of representation must be duly authorized by Aminigboko Community Rulership/Leadership and Chiefs/Heads of respective major families in our community under the rulership of Chief Olephiri Franklin Igoma (JP).


Chief Olephiri Franklin Igoma (JP) is the eligible authorized representation of Aminigboko Community, who filed the Specific Instance against Daewoo Nigeria limited /Daewoo E&C for and on behalf of the Chiefs, Council of Chiefs, Community Development Committee (please refer to **appendix 16 - addendum 2**)

10.DAEWOO NIGERIA LIMITED ESTABLISHMENT OF PARALLEL LEADERSHIP STRUCTURE FOR PURPOSE OF DEPRIVATION AND CRISIS

Daewoo Nigeria Limited at the commencement of the forceful occupation of our land under heavily armed security and **decline** to engage/interface with the age-long Aminigboko Community governance structure which Chief Olephiri Franklin Igoma(JP) is the incumbent Uwema (Paramount Ruler). The Chief/Head of Akiro Family-Chief Promise Sunday Igoma(JP) who is the custodian of the land of Akiro Family, for and on behalf of members of the family, the Chief/Head of Ogbolo Family-Chief Godpower Mark Akari who is the custodian of the land of Ogbolo family for and on behalf of members of the family, Community Development Committee, Employment and Education Bureau, Aminigboko Business Community and to follow our traditional/cultural procedures rather **established** parallel leadership structures, a stratagem for the ongoing deprivation and crisis.

11.DAEWOO NIGERIA LIMITED DECLINE TO OBEY GMoU AGREEMENT/ NIGERIAN CONTENT DEVELOPMENT CONTENT ACT 2010

Daewoo Nigeria Limited also decline to implement the provisions of the GMoU agreement, interface with the Aminigboko Community Trust Members, implement the community content provisions, community labour right, provision of sustainable development programmes/projects, develop skills, to accept the Aminigboko Community employment quota list (unskilled, semiskilled, skill



professionals, among other), to release/approve the award of community content contracts to indigens through the community governance structure, etc.

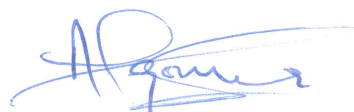
12.RIPPLE EFFECT OF DAEWOO NIGERIA LIMITED INFRACTIONS

When the plan to incarcerate the Uwema Aminigboko Community and the Chief/Head of Akiro Family failed following criminal charges that was discharged and acquitted, Daewoo Nigeria Limited deployed stratagem for conflicts and carried out the following.

- i. Set up parallel leadership structure rebellious to the age-long Aminigboko Community governance structure that signed the GMoU agreement meant for the Enwhe project, among others.
- ii. Sponsor/Fund the planned dethronement/ongoing legal matter against the Chief/Head of Akiro Family at the instance of forceful occupation of the family land for use as fabrication/construction of Enwhe West.
- iii. Sponsor the purported suspension of the Chief/Head of Ogbolo Family, to give way for illegal interface. Said purported suspension already debunked by the Oghu Royal House/Akari Ruling House.
- iv. Decline to interface with the Aminigboko Community Trust (CT) members accredited by the community.
- v. Decline to implement the provisions of Shell GMoU agreement.
- vi. Mobilize youths rebellious to the Aminigboko Community governance structure engaged by Daewoo Nigeria Limited Project Team to disrupt/vandalized the community organized sensitization/training of Skills in conjunction skills associations/professionals in the area, under the cover of military officials posted at the Daewoo fabrication yard. Properties worth million were destroyed.
- vii. Decline to disclose chemical content of borrow pit and for joint inspection. And discharged unknown content into the environment.
- viii. **The activities/ infractions of Daewoo Nigeria Limited have polarized Aminigboko community, threatened the lives of Aminigboko Community rulership/leadership cabinet members and their families, illegally/forcefully displaced landowners, leading to arms build up in the community by rebellious youths used to displace landowners and enforce parallel leadership in the community, among others.**

13.HOW DAEWOO NIGERIA LIMITED BENEFIT FROM CONFLICT STRATAGEM AND HARM ON AMINIGBOKO COMMUNITY.

With the above-mentioned conflict stratagem, setting aside the Aminigboko Community age-long traditional governance structure the community interface



platform, the Chiefs/Heads of Landowning families who are the custodian of the respective families, lands for and on behalf of members of the families, and the Aminigboko Community accredited Community Trust Members, Aminigboko Community becomes VULNERABLE. Subsequently, Daewoo Nigeria Limited took advantage and carried out the following:

- i. Awarded all community content contracts associated with the Enwhe Project (building of fabrication yard/construction of manifolds) to third parties/cronies.
- ii. Engaged third parties to fill the Aminigboko Community employment workforce quota in all categories (unskilled, semiskilled, skill professionals, etc).
- iii. Decline to develop skills.
- iv. Decline to carryout sustainable development programmes/projects.
- v. Decline to carryout interventions/mitigation as a buffer following adverse conditions affecting the populace following execution of the Project.
- vi. Daewoo Nigeria Limited and the parallel leadership structure it established with strangers are currently interfering in Aminigboko Community age – long traditional governance processes and interface mode, displaced age-long traditional governance structure and the custodian / manager /controller of land by landowning families.
- vii. Aminigboko Community Traditional stools/land desecrated.
- viii. Our Sacred/Heritage sites destroyed, etc. **These sensitive issues are worthy of the KNCP consideration.**

14.DAEWOO NIGERIA LIMITED DECLINE ALL MEDIATION IN COUNTRY PRIOR TO FILED SPECIFIC INSTANCE

Aminigboko Community Rulership/Leadership prior to the filed Specific Instance against Daewoo Nigeria Limited and Daewoo E&C took the following mediation steps in country:

- i. Complained the infractions to National Human Right Commission, Abuja, Federal Capital Territory and the commission replied via a letter dated 2nd January 2018 reference number C/ 2108 / ESCR/ 4737/HQ addressed to Chief Olephiri Franklin Igoma (JP), Uwema (Paramount Ruler) Aminigboko Community and advised we explore internal dispute resolution mechanism set out by the Rivers State Government, please find attached **appendix 17**



Madam, please note; Rivers State Government do not have dispute resolution mechanism.

- ii. In a related development complaints of breached was reported to The Commander Joint Task Force, Operation Delta Safe, HQ by Akiro Family, Uwema Aminigboko Community and Aminigboko Community respectively. The Commander, Joint Task Force, Operation Delta Safe, HQ approved audience for mediation of the issues raised (Daewoo Nigeria limited forceful occupation, without engagement is one aspect of the complaint). Kindly find attached copies of mediation schedule dated 17th July, 2019 and 31st July 2019 appendix 18/18a. **Daewoo Nigeria limited decline to attend.**
- iii. Subsequently, Aminigboko Community and Uwema Aminigboko Community complaint of violation/ breaches to the Honorable Minister, Federal Ministry of Environment, Abuja. The Honorable Minister, replied via the Uwema Aminigboko Community in a letter dated 2nd July, 2019 reference number FMEnv/EA/EIA/1824/vol.1/ 569 Daewoo Nigeria Limited forceful entry is one of the key issues, **appendix 19.** This was followed by the Honorable Minister, Federal Ministry of Environment, Abuja invitation for stakeholders meeting via letter dated 26th February, 2020 reference number FMEnv/ EA/ EIA / 4487 / 85 and 18th march, 2020 reference number FMEnv / EA / EIA / 4487 / 1 / 88 respectively addressed to the Community Secretary. The scheduled meeting was postponed indefinitely, **appendix 20/20a.**

It was at the instance of Daewoo Nigeria limited decline to attend to complain via correspondence, turned down mediation mechanism of the Commander, Joint Task Force, Operation Delta Safe, HQ and the Honorable Minister, Federal Ministry of Environment, Abuja, that Aminigboko Community leveraged on the OCED dispute resolution mechanism to address our plight. The KNCP termination/rejection of the mediation process is to promote impunity and insensitivity of Daewoo Nigeria Limited on the alleged ongoing violations.

15.DAEWOO NIGERIA LIMITED MADE UP / FABRICATED SOME OF THE DOCUMENTS FOR SPECIFIC INSTANCE DEFENCE

Most of the documents presented by Daewoo Nigeria limited to KNCP that pertains Aminigboko Community were made up / fabricated following the specific instance filed against them for defense. The members of parallel



leadership structure DNL set up in Aminigboko Community do not have a valid document to back the spurious claim on land and traditional stools because of their stranger's status (called Ekpeye Emughan which does not exist in Aminigboko Community). KNCP in course of assessment did not make available any land / chieftaincy documents to counter ours. **What sustains the illegal structures is Daewoo Nigeria limited management insistence to interface with the illegal platform for crisis and to take undue advantage of the community content benefits meant for Aminigboko Community.**

16.STATUS OF DAEWOO NIGERIA LIMITED CONSTRUCTIONS

Daewoo Nigeria limited have completed 95% construction of Enwhe East manifold in the land of Ogbolo Family, please find attached and have commenced the construction of Enwhe West manifold in the land of Akiro family, please find attached pictures, **appendix 21. Currently on stood off to resume in two months, to fast track the construction of manifolds to completion leaving Aminigboko Community in deep crisis without responsible to the alleged violations**

17. INCOMPLETE MINI WATER PROJECT

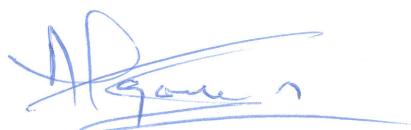
The only sustainable development project carried out by Daewoo Nigeria Ltd is the incomplete mini water project, please find attached, pictures, **appendix 22.**

18.AGE LONG AGREEMENTS/TRADITIONAL STOOL OF UWEMA AMINIGBOKO

Akiro family and ogbolo family are have age - long land agreements, revalidated boundary agreement, series interface documents, some jointly signed by SPDC over the respective lands covering a period over 5 (five) decades, (please refer to appendix 13 addendum 2 refer)

Historical proofs/ custodian of the symbol of authority of Uwema Aminigboko Community / traditional rulership, process / venue of installation / among others properly explained in the Uwema letter dated 7th June,2022 reference number UAP/ACA/02/JUNE2022 , appendix 23. |

19.AMINIGBOKO COMMUNITY RULERSHIP/LEADERSHIP COMMENT



Korea National Contact Point (KNCP) termination of mediation process and rejection of Specific Instance is a disservice to Aminigboko Community who painstakingly followed due process before filing the Specific Instance, we did not get fair hearing, due diligence not applied in the process to examine the validity of documents presented by the parties, **the excuse of declining further examination of the complaint hinged on Daewo Nigeria Limited/Daewo E&C hiding under the covers of project owner to exempt itself from responsibility and accountability on the alleged violations of the OECD Guidelines.**

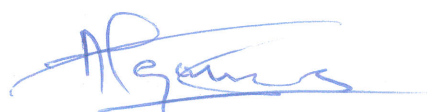
The Korea National Contact Point (KNCP) Initial Assessment of the complaint under the OECD Guidelines concerning National Gas Facilities in Nigeria publication concluded by termination of mediation process yet it **“requesting the respondent (Daewo Nigeria Limited/Daewo E&C) to provide explanations on the issues raised by the complainant in good faith”** The KNCP terminating the complaint mediation proceeding / mediation and still request the Respondent for explanation to the issues raised by the complainant is conflicting and demonstrate inequality/forceful termination of the engagement process.

KNCP decision to terminate mediation/reject complaint ignoring the ongoing harm inflicted on the people of Aminigboko Community, the environment (pollution of ground water), deprivation of content benefits, destruction of age-long traditional interface structures, cultural and traditional systems, desecration of our land/traditional stools, no sustainable development programmers'/projects, no skill training, illegal documentation of landowners, sponsoring / attempt to dethrone traditional stools, ongoing attempt to displace the indigenous people of Aminigboko Community and enthronement of strangers (Ekpeye Emughan) in our Community and others multiplier effect / ongoing crisis in the face of all these complaint is not an encouragement for the use of mediation as a mean of dispute resolution mechanism.

The FIAT decision of KNCP does not reflect OECD mediation process/procedure core values of FAIR HEARING, which was absent in the complaint mediation process by the Korea National Contact Point.

20. CONCLUSION

Aminigboko Community/Leadership have engaged consultants who is carrying out thorough and comprehensive valuation of the harm to the people of Aminigboko and the environment, all community content benefits in line with Nigerian Content Development Act 2010, destroyed properties and deprivation,

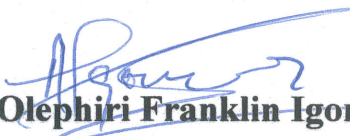


among others by Daewoo Nigeria Limited in course of sitting fabrication yard and the construction of manifolds in Aminigboko Community.

Currently, in consultation with key stakeholders to review the termination/rejection and to consider on the next step at the conclusion of the process in pursuit of justice using nonviolent approach.

Thank you in anticipation.

Yours faithfully,



**Chief Olephiri Franklin Igoma(JP),
Uwema(Paramont Traditional Ruler) Aminigboko Community
Emughen Clan, Abua Odual Local Government Area,
Rivers State.**

For and on behalf of the Chiefs, Council of Chiefs and the Aminigboko Community Development Committee.

