



NIMASA's Lacunas in the Discharge of Its Regulatory Functions in the Management of Oil Spills Pollution in Nigeria

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ABSTRACT

Nigeria and Niger Delta region in particular have experienced environmental pollutions consequent from oil exploration and production activities. Fauna and flora as well as the entire marine ecosystem in these areas are at risk from oil spills pollution. Investigation to establish the indebt consequences of oil spill pollution on key performance indicators as well as the remedial actions for resuscitation is most times hinged on effective implementation, monitoring of the regulatory framework of the regulatory agencies saddled with such responsibilities. The overall success of which depends fully much on the environmental ambient and the enforcement capacity of the regulatory agencies. Effective maritime safety administration, maritime labor regulation, marine pollution prevention and control, search and rescue, inspections, cabotage enforcement, shipping development and ship registration, training and certification of seafarers, and maritime capacity development are the main focus of NIMASA as a governmental agency. However, all these specific roles are often not met due to certain lacunas within the corridors of the regulatory framework.

Keywords: Oil spills, Oil pollution, Regulatory Regime, Regime, Environmental Consequences, Ecosystem and Impact, Marine Habitats, Niger Delta, Nigeria, legislation, Environment

INTRODUCTION

Prolong and persistent oil pollution in the Nigeria waterways have posed grave challenges leading to environmental degradation, destruction of the ecosystem, environment, fishing operations, revenue, and sometime lives of the inhabitant of the spill polluted areas.

Surprisingly, the spills pollution seems to have persisted, despite existing legislations sanctioning the polluters and management of the spills pollution in Nigeria making it seem as if there was no legislation sanctioning such environmental neglect before now.

Studies revealed that oil pollution and environmental degradation in Nigeria have persisted and on the increase by the day.

This paper will attempt to review the existing regulatory lacunas experienced by NIMASA in identifying their deficiencies and gaps and providing enforceable sanctions against all polluters

and defaulters of prescribed protocols in managing oil spills pollution in Nigeria and viz a viz the perceived inability of the Petroleum Industries Bill (PIB) to effectively enforce against deliberate pollution.

In 2018, the Nigerian Maritime Administration and Safety Agency (NIMASA) being the primary regulatory body for maritime activities in Nigeria, analyzed the Country's maritime endowment as comprising a coastline of over 850kms, an exclusive economic zone of over 200 nautical miles, a vast inland waterways resource estimated at nearly 4,000kms, capable of supporting a vibrant intra-regional trade. Nigeria's total annual freight cost, which is estimated at between \$5 billion and \$6 billion annually, places shipping at the heart of the Country's economic growth.

The lack of proper, effective, and timely enforcement of sanctions on violators of the laws of the land contributes significantly to the environmental negligence by oil producing and Shipping Companies in the Niger Delta Region of Nigeria.

The focus on environmental protection and challenges for non-enforcement of sanctions by NIMASA forms a core basis for this paper. In going forward, we would posit, to wit, that whether in Nigeria or elsewhere, the discussions on sanctioning as a principle of environmental law hinges on a justification as to why there should be sanctions in the first instance. Thus, it is trite to inquire if and why there is even a need to protect the environment. A consensual protection of the ecosystem has been viewed as the only solution to the global environmental challenges (Oks, 2015). Hence, not only are all of marine resources finite, they are also important for continued sustained functionality of planet earth, and are interconnected with each other. The above position tallies with the view of some other environmental schools, to wit, that the need for environmental protection stems from the critical issues of maintaining good human health (Chartered Institute of Environmental Health, 2017), eliminating or at least curbing the notorious global warming and climate change challenge, reducing the depletion of marine finite resources (Mensah and Castro, 2014), and the fact that matters of environmental concern are integral to other aspects of life and societal construction (such as policy and political concepts) (Scotford, 2017). It is therefore deducible from the foregoing that while environmental protection is the basis for environmental law, it also maintains necessary harmony with the other subjects of life that might be affected by environmental issues caused by oil pollution.

A reason for the great pollution impacts of oil and gas industry on the Nigerian marine environment and public health, as against other common sources of pollution identified, might not be unconnected to the fact that the oil and gas sector is the main sustenance of the Nigerian economy (Akinlo, 2012; Uwakonye et al., 2006). Scholars believe crude oil production has become more relevant in contemporary times as there is yet no cheaper alternative to it as a form of energy (Oy-ende, 2012). Indeed, over 80% of Nigeria's revenue comes from sale of oil produced from the Niger Delta region. Therefore, the providence of abundant oil in Nigeria seems to be a necessary evil that the Nigerian country cannot escape from. It is, therefore, trite to assume that while there seems to be a perceived usefulness of oil and gas in the Nigerian society, the volatility of the industry necessitates some regulation that would check the extent of degradation caused on the marine environment by it.

Undeniably, the Maritime Industry is one of the most lucrative industries after oil exploration

and production in the world. It plays a major role in the economic development and sustenance of any country by largely setting the pace of growth experienced in other industries. Hence, it is a matter of great importance that the challenges faced in the proper regulation of the sector be addressed using more efficient mechanisms. Hence this disquisition aims to explore the ways of curbing the challenges and prospects of the Nigerian Maritime Industry as well as the relevant regulatory frameworks and their implications for foreign investments.

OVERVIEW OF THE LITERATURE

Environmental principles serve as a structural framework in collaboration with the regulatory framework for ensuring environmental protection and oil pollution management in the marine ecosystem. Several researchers have argued that environmental standards embedded in legislation can only be complied with if there is efficient regulation to guarantee such compliance. Moreover, most regulated activities pose high risks to the environment hence, the reason why most regimes set up enforcement authorities to implement environmental standards in such high risk's activities.

Examples of pollution for which strong criminal sanctions have been developed in the USA are the Exxon Valdez oil spill or the Deep-Water Horizon spill. Contrarily, in Nigeria many polluters have gone unpunished for their offences. This makes it very imperative to have a better-developed regulatory regime that have to be implemented and enforced devoid of all lacunas. Exploration activities started in the Niger Delta in 1956 when Shell British Petroleum (now Royal Dutch Shell) discovered crude oil in the onshore area of Oloibiri in Bayelsa state (of the Niger Delta region). By late 1956, another discovery of commercial value was made at Afam, in Rivers State (of the Niger Delta). And by 1958, full commercial development of crude oil had already begun hence counting down when the region started to experience oil pollution. Following this appraisal of the Legal Frameworks for the Control of Environmental Pollution in the Niger Delta of Nigeria, it became very critical to forestall unabated oil pollution in the region.' Uchenna J Orji, (2012). This is important for the human health implications. Best Ordinioha and Seiyefa Brisibe, '(2013).

THE LEGISLATIVE LACUNAS: (THE NIGERIAN CONSTITUTION)

The back stone, the 1999 Nigerian constitution is the grund norm of all laws in Nigeria. Section 20 of the Nigerian constitution provides that: "the State shall protect and improve the environment and safeguard the water, air, land and forest Chuks-Ezike 2018. The Nigerian constitution creates an obligation on the Nigerian government and its enforcement agencies to ensure environmental protection while guaranteeing public safety. This provision in other words, creates some form of liability for the Nigerian government (albeit, in circumstances where they fail to comply with the obligation). Accordingly, it includes some form of criminal liability to any Nigerian government that fails (or and has failed) to regulate the environmental crime in Nigeria.

Other environmental laws regulating the oil sector has been enacted in Nigeria. It is interesting that despite the apparent disregard to the Nigerian environment, the environmental law regime in Nigeria is replete with legislations of this nature (Ijaiya and Joseph, 2014). Amongst such laws are the Petroleum Act, the Oil Pipelines Act, the Petroleum Production and Distribution Anti Sabotage Act, and the Petroleum Industries Bill, which were enacted for the enforcement of appropriate sanctions on violators.

Petroleum Act

The Petroleum Act (1990) was enacted to regulate all petroleum activities in Nigeria (Orji, 2012). Section 2(3) of the Petroleum Act mandates a lessee or licensee to pay "fair and adequate compensation for the disturbance of surface or other rights to any person who owns or is in lawful occupation of the licensed or leased land." Indeed, the obligation created by the Act on a potential lessee or licensee to pay some form of compensation for surface disturbance is laudable. However, the Act fails to define or interpret exactly what it deems to be "fair and adequate." The vagueness caused by the failure of the Act to precisely define what it deems as "fair and adequate" leaves the determination to the court, which can be belittled by a good lawyer on legal technicalities.

Oil Pipelines Act

The Oil Pipelines Act (1956) was enacted to regulate the granting of licenses for the establishment and maintenance of oil pipelines (this is provided for in the Preamble to the Act). This Act gives the holder of an oil pipeline license, right to enter upon, take possession of or use a strip of land specified in the license and construct, maintain, and operate an oil pipeline and ancillary installation (Section 11[1] of Act). However, the Act also requires such holder to prevent potential pollution arising from such spill through its provision for compensation under section 11(5) of the Act. Section 11(5) of the Act provides thus: The holder of a licence shall pay compensation –a. to any person whose land or interest in land (whether or not it is land respect of which the licence has been granted) is injuriously affected by the exercise of the rights conferred by the licence, for any such injurious affection not otherwise made good; and b. to any person suffering damage by reason of any neglect on the part of the holder or his agents, servants or workmen to protect, maintain or repair any work structure or thing executed under the licence, for any such damage not otherwise made good; and c. to any person suffering damage (other than on account of his own default or on account of the malicious act of a third person) as a consequence of any breakage of or leakage from the pipeline or an ancillary installation, for any such damage not otherwise made good.

By this provision, a license holder under this Act, is obligated to pay compensation to a person whose land or interest has been affected by the exercise of the right under the license. A careful examination of section 11(5)(c) shows some form of defense to the license holder in the sense that such license holder could easily allege a damage of the oil pipeline that had caused a spill was due to the acts of a third party. Hence, a mere allusion as to the cause of an oil spill to be the willful sabotage of oil pipelines by local indigenes of the Niger Delta could absolve oil operators of the liability of compensating victims of the Niger Delta oil spills. The Act could, therefore, encourage an arbitrary abuse of the strict liability rule by corporate oil polluters seeking to evade the sanction imposed by the provisions of the Act. The Act could, therefore, defeat the very purpose for its enactment.

PETROLEUM PRODUCTION AND DISTRIBUTION

Anti Sabotage Act

It is on record that several oil companies in Nigeria have alleged several pollutions from their facilities to pipeline sabotage and vandalism (Frynas, 2002). Whilst this paper has tried to allude to a use of sabotage by local indigenes as a defense to oil spill liability on the part of such operators, the paper yet agrees with the opinion of other scholars that there might be events of sabotage of oil pipelines by local indigenes in the Niger Delta (British Broadcasting Corporation,

2010; Hinshaw and Kent, 2016). As had been asserted by a scholar that, “Crude oil is tapped from pipelines and terminals of the oil producing companies with advanced technological equipment in the waterways, creeks, swamps and high seas. Plastic pipes are fixed to manifold points and intersection of several pipelines and crude oil is then pumped into barges. In some cases, ships are hooked to hoses that siphon crude from oil facilities that may be several hundred meters away” (Ikelegbe, 2005). Shell Producing Development Company (SPDC) of Nigeria have repeatedly alleged illegal refining and third-party interference as a main source of pollution in the Niger Delta (Shell Nigeria, 2017). The Petroleum Production and Distribution Anti Sabotage Act (1975) defines sabotage as a person who: a. wilfully does anything with intent to obstruct or prevent the production or distribution of petroleum products in any part of Nigeria; or b. wilfully does anything with intent to obstruct or prevent the procurement of petroleum products for distribution in any part of Nigeria; or c. wilfully does anything in respect of any vehicle or any public highway with intent to obstruct or prevent the use of that vehicle or that public highway for the distribution of petroleum product. The Act stipulates the death penalty or an imprisonment term of 21 years as punishment for an offender under the Act. This punishment seems more than sufficient to sanction an environmental crime of its sort.

Petroleum Industries Bill

The Petroleum Industry Bill (2012) seeks to “provide for the establishment of a legal, fiscal and regulatory framework for the Petroleum Industry in Nigeria and for other related matters” (Preamble to the Bill). This implies that the Bill covers all matters relative to oil and gas in Nigeria including environmental matters that relate to both spheres.

Other regulatory framework include:

- Merchant Shipping (Prevention of Pollution by Harmful Substances in Packaged Form) Regulation 2012
- Merchant Shipping (Prevention of Pollution by Sewage) Regulation 2012
- Merchant Shipping (Sea Dumping) Regulation 2012
- Merchant Shipping (Ship Generated Marine Waste Reception Facilities) Regulation 2012
- Marine Environment (Sea Protection Levy) Regulation 2012
- Inland Waterways and Non-Convention Vessels Safety Regulation 2012

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OTHER LACUNAS

Insecurity in the Maritime Waterways

The security threats in the maritime environment are of serious concern with attendant negative impact on full harnessment of the marine economic full capabilities. What is perhaps more disturbing is that much of the criminal activities in the maritime environment are directed at the economic lifeline of Nigeria. In other words, the scourge of illegalities, such as sea robbery, piracy, crude oil theft, poaching, human and illicit trafficking of weapons and drugs

among others are carried out in the marine waterways constituting serious challenges to the development of the country and the region at large.

Maritime security intervention therefore involves the continuous surveillance and reconnaissance of the nation's maritime domain with a view to prompt interdiction when infringements occur to the nation's maritime domain.

Poor Shipping Development in Nigeria

The maritime industry is a goldmine. However, in Nigeria, it is a goldmine that has remained largely untapped because, to a large extent, an integral part of the industry – shipping development – has not moved forward over a long time. No country can hope to participate and derive full economic benefits from the maritime sector without strong advancement in shipping development. In fact, shipping development is a major indicator index of a country's strength in the maritime sector. This is what has made several other countries like South Korea, the US the biggest players in the world's maritime industry.

Shipping development is a tripod that rests on three legs. The first leg of the tripod is fleet expansion. This has to do with indigenous ownership of vessels.

The second leg of shipping development is ship repairs. To jump start this activity, NIMASA bought a multi-million-dollar modular floating dock over a year ago, but the initial challenge had been where to locate it.

The third leg of the shipping development tripod is shipbuilding. There are several shipbuilding facilities in the country but are either non-functional or operating at below capacity. The point that is very pertinent is that financing is central to shipping development in Nigeria, as indeed it is in other parts of the world. It is important that ship builders have access to finance. The government can come up with incentives to ship builders, by way of special intervention and support.

Customs Duty on Vessels

A major challenge prospective Nigerian ship owners face is customs duty on vessels. This is arguably the biggest obstacle and setback to ownership of vessels in the country. Interestingly, however, NIMASA is striving hard to ensure that this issue, which has proved to be very thorny is ameliorated by following political protocols. Given the multiplier effect of ownership of vessels by Nigerians, it will be welcome development for government to give waivers to people who wish and are capable of buying ships.

With the continuous unpredictable behavior of oil revenue trend, and against the backdrop of government's efforts at diversifying the economy, maritime domain is one sector that has the potential to becoming the country's economic dependency. Again, a fully developed and vibrant shipping industry can reduce quite substantially the queue in the country's labour market, because of the hundreds of thousands of jobs it can create.

Marine Infrastructure and Maintenance Deficit

In 2019, the Marine infrastructure deficit was identified as one of the major challenges faced by the Nigerian Maritime Industry, owing to the fact that its success is largely dependent on its

infrastructural development which includes ports, terminals and cargo handling equipment, most of which were built several years ago, and cannot presently handle all of the tonnes or capacity currently received on a daily basis.

One of the major causes of infrastructural deficit is the unavailability of operational equipment, coupled with the failure of the industry's management personnel to widen the country's shipping business, which has ultimately culminated in the country's revenue loss in the industry in the last few years. Even in cases where this equipment is available, the required expertise to achieve a proper maintenance structure seems quite hard to find, as most persons involved in the chain of vessel acquisition and maintenance do not always possess the requisite expertise. In a maritime survey conducted in 2019, it was discovered that most companies in the industry have no room for maintenance expenditure, as it is often considered a waste of resources.

Loss of Revenue Owing to Inefficiencies and Sharp Practices

In recent times, research has revealed that Nigeria is currently losing over 15 billion naira in revenue, with its percentage in ownership of vessels lower than the 8% contemplated in extant legislations, owing to the unpredictability in maritime operations, sharp practices, unanticipated delays in ports shipment etc. More so, the collaboration amongst stakeholders, inclusive of regulators and operators alike, to curb or mitigate the existing inefficiencies through the promotion of global best practices, and the use of innovative technologies seem to be slow-paced.

Lack of Funding

The Maritime Industry is largely capital intensive and thus, requires a significant amount of funding as a lot of businesses thrive on the success of the industry, which is due to the high demand for shipping and trade level in the country. As such, a lack of funding would impede economic growth to a large extent, creating a lot of risks for foreign investments.

The Nigerian Maritime Industry as in other Countries of the world is capital intensive. Hence, it requires significant amount of capital to keep it afloat. Undoubtedly, investment has been acknowledged as one of the most reliable methods for the expansion and sustenance of any industry, irrespective of size. However, the level of investment is also dependent on an ascertainable valuation of risks as well as revenue generated. So, in a case where the risks weigh higher than the revenue, this poses a challenge as it reduces investment options.

In addressing these lacunas, some regulatory frameworks have been put in place:

1. **Nigerian Maritime Administration and Safety Agency (NIMASA) Act 2007:** The NIMASA Act created NIMASA and charges it with promoting the development of shipping and regulating issues affecting Merchant ships and Seafarers in Nigeria. Other statutory tasks of NIMASA include but are not limited to, regulating shipping safety in terms of ship construction and navigation, and administering ship registration and licensing.
2. **The Coastal and Inland Shipping (Cabotage) Act 2003:** The Cabotage Act was enacted in response to a growing demand from Nigerian maritime enterprises for legal intervention, to encourage Nigerians in the participation of the country's internal coastal trade. The Act in a bid to encourage participation restricts the participation of foreign vessels in domestic coastal trade (including the carriage of goods and passengers in Nigerian seas), encourages the growth of indigenous tonnage, and creates a Cabotage

vessel financing fund. The Act specifically prohibits a vessel that is not wholly-owned and manned by a Nigerian citizen, built and registered in Nigeria, from engaging in the domestic coastal carriage of cargo and passengers within the coastal territorial inland waters or any point within Nigeria's exclusive economic zone.

3. **Nigerian Ports Authority (NPA) Act:** The NPA Act empowers the NPA to maintain, improve and regulate the use of the ports; ensure the efficient management of port operations; provide and operate ports facilities; form and establish or incorporate subsidiaries or affiliate companies with other persons or organizations, for the purpose of carrying out any of its functions.
4. **Merchant Shipping Act, 2007:** This Act provides for Merchant shipping in Nigeria and allows only registered Nigerian ships to operate commercially to the exclusion of others, except for statutory exempted cases.
5. **The Finance Act 2021:** This Act primarily regulates the taxation of companies, inclusive of companies involved in the maritime business. It is important because taxation policies play a huge role in attracting foreign direct investments.

OTHER FUNCTIONS CARRIED OUT BY NIMASA

Cabotage Services

- Cabotage Act
- Cabotage Vessel Financing Fund (CVFF)
- Requirements for the issuance of Cabotage Waivers
- Cabotage Services Department Structure

Ship Registration Services

- Documents to be submitted in respect of Registration Services
- Nigerian Ship Registry Tariffs
- Clear Timelines / Deadline for Processing of all Forms of Application after Payment
- Downloads / Forms

Legal Services

- Requirements and Procedure for Registration as a Shipping Company or Shipping Agent
- Requirements and Procedure for Renewal of Shipping Company or Shipping Agent License
- Legislation & Legal Framework
- International Seabed Association

Maritime Safety and Security

- Flag State Control
- Port State Control
- Surveys and Inspections
- Navigation Systems
- Hydrographic Services
- Search and Rescue Services
- Ship Casualty/Incident Investigations
- Ship Security
- Seafarers Qualification Training and Certification

- Training Record Book
- Seafarers Medical Examination
- Marine Superintendent Services
- Qualification and Training
- Downloads/Forms/Links

Maritime Labour Employment

- Maritime Labour Convention 2006 (MLC, 2006)
- Approved Stevedoring Charges
- Requirements and conditions for obtaining services and products from the Maritime Labour Service Department

Marine Environment Management

- Merchant Shipping Marine Environment Regulations 2012
- Marine Environment Protection Statutory Documents
- List of Insurance Service Providers Recognized by the Agency for Issuing Civil Liability Insurance Blue Cards
- Classification Societies (Recognized Organizations)
- Compliance Monitoring Inspections
- Port Reception Facilities (PRF)
- Removal of Wrecks and Derelicts in Nigerian Waters
- NSC-IOPC Fund Secretariat
- Ship Recycling / Scrapping
- Summary Guide for Marine Environment Statutory Documents that Applies to your Vessel, Company, Facility or Platforms
- Marine Litter Action Plan
- Marine Notices
- Marine Environment Online Services

CONCLUSION

Interestingly, the Nigerian Maritime industry has developed through time, but there is still a compelling reason to continue developing the industry to attract potential investments to enhance the country's economic performance. As a major exporter and importer of goods to and from other nations, it is critical for the government to support and pay more attention to the industry's challenging lacunas, as it will not be able to function at its full potential unless the government becomes more cognizant of how it influences the economy.

More particularly, asides from addressing the above-listed challenges, existing legislation should be amended for more empowerment and to create more room for foreign participation in the industry, as it is one sure method to increase the revenue generation capacity of the industry.

The identification of clear- cut legislation for the sanctioning of violators and polluters of the environment is the way forward. Enforcement of legislation with all amounts of integrity without any form of bias will also go a long way in reducing environmental pollution negligence

and practices. Elimination of overlapping functions among the various tiers of government, Ministries and Agencies will further ensure prompt sanctions of offenders.

A cursory look through the discussions above, shows an ineffectiveness of environmental regulations in extant petroleum laws in Nigeria. Indeed, the current structure of the PIB and its componential parts still fail to provide the necessary solution to either of these weaknesses, hence the compelling need for a holistic review of the legislative architecture and administrative framework to reduce environmental pollution incidences and bring the sanctioning under the laws at par with the current spate of pollution activities in Nigeria's oil sector

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