

White Paper



On the Shortcomings of National Institutions in the Oil and Gas Sector with Key Recommendations for Future Actions.

October 2022



Funded by MAVA Foundation through the Regional Partnership for Conservation of the Coastal and Marine Zones in Africa (PRCM)

Produced and published by the Conservation Society of Sierra Leone (CSSL)



Table of Contents

- 1 Introduction and Background
- 2 Key objectives of the White Paper
- 3 Collection and Rationalisation of Information on the Shortcomings of National Institutions in the Oil and Gas Sector in Sierra Leone
- 4 Major Threats and Incidences of Oil and Gas Pollution in Sierra Leone
- 5 Current Actions by National Institutions and Partners for the Prevention and/or Control of Oil and Gas Pollution on the Environment in Sierra Leone
- 6 Key Challenges in the Oil and Gas Sector in Sierra Leone
- 7 Key Recommendations for Implementation by National Institutions
- 8 Conclusion
- 9 Acknowledgements

**Produced by the Communication, Environmental Education and Advocacy Department,
Conservation Society of Sierra Leone (CSSL)**

Written by: Abdul Kaprr Dumbuya, Communications Officer, CSSL

Edited by: Sheku Kamara (PhD), Executive Director, CSSL

Layout and Design by: Kathrin Prinzing, Communication and Advocacy

Contributions: Edward Momodu Sesay, Mariama Kargbo, Abdulai Dauda, Andrea Thompson-Haffner

Introduction and Background

As Sierra Leone braces itself to kick-start oil exploitation and production activities anytime in the near future in identified areas in the country, expectations of high socio-economic boom are rife in all walks of life, particularly across the political spectrum. These activities however, do not go without grave attendant environmental consequences. The marine coastal environment and communities nearby, stand to be adversely affected by such activities.

Marine ecosystems provide a wide range of services, including the provision of food in the form of fishing, shellfish and algae; the natural protection of the coastline against storms and floods; maintaining water quality; supporting tourism and maintaining basic life support systems. The modification of one of the components of ecosystems generates disturbances of ecosystem functions and consequently of ecosystem services.

Experiences from oil producing countries have indicated that, insufficient knowledge about oil spill management before exploitation and production will result in untold consequences on the marine environment and the lives of citizens, especially those around coastal communities.

Sierra Leone is signatory to many international instruments gearing towards the protection and conservation of the marine environment and biodiversity therein. These instruments which include the Abidjan Convention, the International Convention for the Prevention of Pollution from Ships (MARPOL), the International Convention on Oil Pollution Prevention, Response and Cooperation (OPRC), the Ramsar Convention on Wetlands of International Importance among others, compel member countries to translate words and signatures into localized actions and solutions that would ensure the sustainable protection of the marine environment and its biodiversity.

Sierra Leone therefore, developed a national oil spill contingency plan in the past years with local technical support, but this did not incorporate aspects of upstream oil and gas activities and trans-boundary related issues when it comes to oil pollution for oil drilling.

With support from the Regional Partnership for Conservation of the Coastal and Marine Zone in Africa (PRCM) and MAVA Foundation, the Conservation Society of Sierra Leone (CSSL), the Environment Protection Agency – Sierra Leone (EPA-SL), Sierra Leone Maritime Administration (SLMA) and the Institute of Marine Biology and Oceanography (IMBO) in the University of Sierra Leone have been working collaboratively over the years in rolling out activities under the project entitled, **“Sustainably Managing the Impacts of Offshore Oil and Gas Activities in West Africa – The Sierra Leone Project”**, to mitigate the negative impacts of imminent oil pollution on the marine coastal environment and nearby communities.

Even though the country is believed to have done a lot in terms of putting the required regulatory frameworks and establishing relevant institutions to regulate the activities in the oil and gas sector, there are still numerous challenges that require serious attention by government. It is against this backdrop that CSSL was tasked with the responsibility to develop and distribute a White Paper to relevant authorities on the shortcomings of national institutions in the oil and gas sector with key recommendations for implementation.

This document describes the processes employed by CSSL to harvest current challenges faced by national institutions. It also outlines key challenges currently confronted by national institutions, and sustainable and realistic recommendations for implementation, as proffered by state and non-state actors.

Key Objectives of the White Paper

1

Government's attention is drawn to the challenges faced by national institutions in the oil and gas sector in Sierra Leone.

2

Key recommendations to strengthen the oil and gas sector are proffered for implementation by national institutions in Sierra Leone.



Collection and Rationalisation of Information

To expedite the process, CSSL developed and administered questionnaires to different stakeholders in the oil and gas sector in Sierra Leone, and received diverse information relating to what participants believed were the major issues plaguing the sector including threats, challenges and key recommendations for national institutions to implement. The Society further organised a review and validation meeting on the 22nd September 2022 in Freetown, to allow key actors who had earlier provided responses to the questionnaire to help in finalizing the information before being documented and shared to all relevant national institutions.

It is important to note that, the information received from the survey conducted and the validation meeting was added to other information already compiled from various engagements held with stakeholders and coastal communities in the previous years of the project.



Various actors in the oil and gas sector deliberating on the issues, and proffering recommendations

Major Threats and Incidences of Oil and Gas Pollution in Sierra Leone

The key threats for Sierra Leone in relation to oil and gas pollution has to do with risks associated to human health, plants, animals and the marine environment from trawlers, jetties, seaports, and oil tankers.

Pollution of oil products has tremendous impact on marine life including species such as fish, sea weeds, coral reefs, crustaceans, etc. Limiting O₂ availability from floating oil, smearing of species by oil products could lead to changes in appearance or disfiguration, or even death. Species ingestion of oil and gas could also lead to death. Such substances are likely to be transferred to humans leading to health compromises or other complications in man.

Once there is oil spillage on the marine environment, the coastlines could be covered in oil, presenting unsightly scenes. It will cover areas with brackish water, estuaries, coastal channels, especially in mangrove regions impacting not only on the mangrove plants by covering the breathing roots, but also on life forms such as fish in breeding or fingerlings in such environments. Oil washed up as clogs on beaches will have profound discoloration of beaches and other socially and economically important areas, making it unattractive to beach lovers as well as tourists.

Gas spills generally have the potential for gas flares, the fires which are detrimental to all forms of life in the marine environment (including coastlines) as well as terrestrial environment. Fires will further raise the risks of disaster when they come in contact with already existing oil spills.

Sierra Leone has registered a number of incidences of oil and gas pollution that led to massive loss of life and property. Some of these are outlined below:

- The **explosion of a fuel tanker** at a crowded area in Wellington – Freetown on 5th November, 2021, leaving hundreds of injuries, millions of property destroyed and the death of over one hundred people.
- An **oil spill from a fuel tanker** in 2021 at Mile 91 along the Bo–Masiaka Highway, that left one seriously injured.
- In 2009, at least, four were killed and scores left seriously injured in a blaze when **fuel leaking from a broken pipe** caught fire while residents tried to scoop it with jerry cans
- In Mania, in the mid-70's, there was a **gasoline explosion** in the community which drifted down into the sea, and resulted in the loss of human life, property as well as massive loss of marine biodiversity.
- In the 90's, Tombo community, outside Freetown, witnessed an **oil and gas spillage** which resulted into five deaths and loss of properties worth of millions of Leones.

Current Actions by National Institutions and Partners

Sierra Leone has made significant progress in terms of national legislations, signing international instruments and trying to domesticate such instruments to protect its marine and terrestrial environments from activities that cause oil and gas pollution and its attendant effects. In a bid to put into action the content of some of these instruments, national institutions have been collaborating with non-state actors in undertaking the undermentioned actions.

Current Actions by National Institutions and Partners for the Prevention and/or Control of Oil and Gas Pollution on the Environment in Sierra Leone.

Monitoring is being predominantly conducted on the coastal environment (e.g., sandy and rocky beaches, river estuaries, mangrove forested areas, recreational facilities, etc.) by institutions tasked to undertake such actions.

Some form of logistical and capacity strengthening has been provided to relevant/primary institutions that are dealing with oil spills.

The National Petroleum (NP) has established an oil spill response plan and has also made available oil spill response materials at the jetty. They have also been embarking on awareness-raising on prevention and control of oil and gas pollution through radio and television.

The Government of Sierra Leone has established institutions like the National Protected Area Authority (NPAA) and the National Disaster Management Agency (NDMA) among others, to work with national security institutions and the general public to attempt to prevent disasters resulting from oil and gas pollution and related issues. Some form of law enforcement has been undertaken over the years.

The Petroleum Directorate (PD) and EPA-SL have been established by the government of Sierra Leone to regulate and oversee all matters relating to petroleum exploration, drilling and associated environmental safety and protection.

The existence of a national platform is also supporting the promotion of public awareness about oil and gas activities, and some form of coordination and collaboration among actors. The Coalition of Oil and Gas Pollution on the Environment in Sierra Leone (COGaPE-SL) constitutes both state and non-state actors, and was formed by CSSL in 2019 with support from MAVA Foundation through PRCM.

Among other actions, the National Tourist Board has been involved in the manual clean-up of affected areas of the coastal environment (e.g., sandy and rocky beaches, estuary, mangrove concentrated areas and recreational facilities).

In line with policy regulations and enforcement, the Ministry of Environment has developed a policy on plastic waste disposal and control. This policy is expected to indirectly address oil and gas pollution prevention and control.

Some institutions have put in place proper mechanisms for the safe storage of oil and gas products, and have also trained relevant staff to look after such products.

Key Challenges in the Oil and Gas Sector in Sierra Leone

In spite of the aforementioned efforts and progress so far made to regulate oil and gas activities in Sierra Leone, the country however continues to grapple with what seems to be very serious challenges shrouding the oil and gas sector. Such challenges range from insufficient financial, technical and logistical resources, and to some extent, existence of conflicting operational mandates of national institutions.

With support from state and non-state actors, the following have been highlighted as some of the key shortcomings currently affecting the sector in Sierra Leone:

- 1 Weak policies, laws and regulations that should proactively act to prevent oil and gas pollution.
- 2 Institutional capacity: National institutions tasked to monitor oil and gas pollution are not well equipped with the required equipment/tools and technology for effective monitoring of oil and gas pollution, especially when extraction is expected to be done offshore.
- 3 Understanding early warnings, preparing for or managing disasters associated with oil and gas extraction is already envisaged as a challenge when Sierra Leone starts drilling because they are novel to the context.
- 4 Limited involvement of civil society by national institutions in routine monitoring of oil and gas activities and associated suspected pollution incidences.
- 5 Limited monitoring efforts by national regulatory bodies of oil recycling outfits, garages and oil marketing companies to reduce the current spate of oil pollution on the environment.
- 6 Limited awareness among the general public on the effects of oil and gas pollution.
- 7 Weak enforcement of laws applicable to oil and gas pollution prevention. This appears to be a systemic issue as it happens with other laws.
- 8 Conflicting mandates and responsibilities of designated national institutions and response organisations for oil and gas pollution prevention and control.
- 9 Limited evidence-based data on oil and gas pollution prevention and control.
- 10 Limited available funding for implementation and domestication of international conventions on the protection of the marine and terrestrial environments.
- 11 High cost of oil and gas prevention equipment, communication capabilities and related facilities.
- 12 Limited political will in addressing oil and gas pollution.
- 13 Centralization of oil companies: Majority of factories, garages and industries are stationed very close to the marine environment both in Freetown and the provinces. This allow them to easily discharge their used oil and other industrial waste into the wetlands, thus causing serious harm to biodiversity present therein.

Key Recommendations for Implementation by National Institutions

1 Institute regular surveillance of the country's maritime zones, including its Exclusive Economic Zone for timely detection of oil spills and prompt communication to the appropriate institutions.

2 Provide the much-needed funding support for the implementation and enforcement of international instruments already signed to by Sierra Leone in order to mitigate the effects of oil and gas pollution on the environment generally.

3 Ensure that the existing National Oil Spill Contingency Plan is regularly updated to capture emerging issues, and also adequately address preparedness and response mechanism issues ahead of future oil spill incidences on the coastal and marine environment.

4 Promote regular public awareness relating to the impacts of oil and gas pollution on the health and livelihood of coastal communities, as well as knowledge on early warning signs and reporting channels.

5 Ensure that the necessary equipment for prompt oil spill detection and response are available in Sierra Leone. Designated personnel should also be knowledgeable with skills to promptly mobilise response, containment, recovery and clean-up actions once oil and gas pollution is detected.

6 Vessels providing bunkering services on the marine territory of Sierra Leone must be religiously regulated by the mandated national institutions (Sierra Leone Ports Authority and/or SLMA). Companies owning such vessels must have proven ability to manage their own Tier 1 or Tier 2 oil spill response plans before operations.

7 Government is encouraged to increase investment in renewable energy, thereby promoting low-carbon fuel bunkering in the country.

8 Institute and implement interdisciplinary and inter-sectoral collaboration and coordination in promoting efforts to mitigate the impacts of oil and gas pollution on the environment.

9 Outline clear mandates and responsibilities of designated national institutions and response organisations for oil and gas pollution prevention and control.

10 Create open space for civil society involvement and participation in routine monitoring of oil and gas activities and associated suspected pollution incidences across the country.

11 Support and sustain the operations of the existing national platform – COGaPE-SL such that it will continue to deliver on its mandate.

12 Support the existing Local Watch and Alert Committees established by CSSL in Mambolo, Rokupr, Gbondapi, Shenge, Sulima and Western Area.

Conclusion

In a bid to strengthen the petroleum sector and also present the country with the expected readiness recommended by international standards for the commencement and operationalization of offshore oil and gas extraction and production, the various challenges outlined above need to be addressed by the Government of Sierra Leone.

The undermentioned key recommendations were therefore proffered by both state and non-state actors from various engagements conducted by CSSL and COGaPE-SL since the inception of this project in 2019. It is expected that if the recommendations mentioned in this White Paper are fully implemented, the hazards and impacts associated with oil and gas pollution on the environment will be significantly minimized.



Acknowledgement and Appreciation

CSSL is pleased to acknowledge and appreciate the undermentioned institutions, most of which are members of COGaPE–SL for the invaluable support provided during the implementation of this project.

- Civil Society Advocacy Network on Climate Change and the Environment – Sierra Leone (CAN-SL)
- Climate Change, Environment and Forest Conservation Consortium – Sierra Leone (CEFCON)
- Culture Radio
- Dept. of Environmental Health, Ministry of Health and Sanitation
- Electricity Generation and Transmission Company (EGTC)
- Environment Protection Agency (EPA)
- Freetown City Council (FCC)
- Green Scenery
- Institute of Marine Biology and Oceanography (IMBO)
- Joint Maritime Committee
- Media One Center (Standard Times Newspaper)
- Ministry of Agriculture
- Ministry of Environment
- Ministry of Fisheries and Marine Resources
- Ministry of Tourism and Cultural Affairs
- National Disaster Management Agency (NDMA)
- National Tourist Board (NTB)
- National Petroleum – SL Limited
- Petroleum Directorate Sierra Leone (PDSL)
- Petroleum Regulatory Agency
- Reptiles & Amphibians Program (RAP)
- Republic of Sierra Leone Armed Forces – Maritime Wing
- Responsible Ecotourism (RECTOUR)
- Sierra Leone Artisanal Fishermen’s Union Consortium
- Sierra Leone Broadcasting Corporation (SLBC)
- Sierra Leone Maritime Administration (SLMA)
- Sierra Leone Meteorological Agency
- Sierra Leone Police – Maritime Wing
- Sierra Leone Ports Authority
- The Office of National Security (ONS)
- Western Area Rural District Council (WARD C)
- All members of the Local Watch and Alert Committees in Mambolo, Rokupr, Kpondapi, Shengay, Solima and Western Area.





The Conservation Society of Sierra Leone

86A Main Road, Congo Town

Freetown

Sierra Leone

<https://cs-sl.org>

info@cs-sl.org