Date: 25 March 2025

To: Wael Sawan, Shell Chief Executive Officer

CC: Shell plc Executive Committee – Sinead Gorman, Philippa Bounds, Robin Mooldijk, Rachel Solway, Huibert Vigeveno, Zoë Yujnovich

Shell plc

Shell Centre London

SE17NA

Dear Mr. Sawan and members of the Shell plc Executive Committee,

We urgently demand Shell plc to confirm if the company will fully clean up the vast pollution legacy associated with Shell Petroleum Development Company of Nigeria (SPDC) assets on the Niger Delta and share publicly how this essential clean up process will occur.

We, the undersigned civil society organizations from across Nigeria and around the world, express our outrage that Shell plc has sold its Nigerian subsidiary SPDC to the Renaissance Group without cleaning up the vast oil pollution caused by its operations in the Niger Delta and without compensating the hundreds of thousands of people whose lives and livelihoods this pollution has affected.

Shell plc claims to have as core values honesty, integrity and respect for people.[1] Yet after 70 years of oil extraction in the Niger Delta region, yielding billions of dollars in profits, in our opinion, the company appears to have just walked away,[2] leaving the local communities to deal with severe public health problems due to the profound oil contamination of the water sources, soil, and surrounding environment.

The issues of oil pollution in the Niger Delta are well documented: organisations, academics, and hundreds of communities have repeatedly provided evidence and demanded that the company clean up the clearly visible levels of contamination. [3][4][5]

As a result, generations of Niger Delta communities have lived and raised children and grandchildren who will live and prematurely die breathing oil-polluted air, eating oil-contaminated food, farming on petroleum-logged soil, and fishing in rivers and streams choked with hydrocarbons.[6][7] Maximizing shareholder value should not trump everything. We believe that Shell plc should honour its corporate responsibility and commitments to human rights by remediating the oil pollution and its impacts on the Niger Delta communities.

Shell's divestment from the region, together with corresponding moves from other companies operating in the Niger Delta — Eni, ExxonMobil, and TotalEnergies — has taken place over the past year, during which there have been regular public calls for transparency about these processes.[8] Despite these calls, Niger Delta communities feel that consultation with affected people has been manifestly inadequate,[9] and Shell plc has responsibility to address these concerns due to their board membership of the Extractive Industry Transparency Initiative (EITI).[10]

In the case of Shell plc, the Nigerian Upstream Petroleum Regulatory Commission rejected Shell plc's divestment application late last year due to concerns about Renaissance's ability to

manage the assets.[11] There is no evidence that Shell has provided the scale of funds necessary for a cleanup; the proposed incoming Renaissance Group is an opaque entity that has provided no evidence it has the resources necessary to support adequate cleanup. According to United Kingdom (UK) Foreign, Commonwealth & Development Office documents obtained by UK civil society organisation Corner House, obtained through a public records process, when asked about cleaning up the Niger Delta by the UK's High Commissioner to Nigeria on a trip to Port Harcourt in 2024, a Shell executive stated, "We just have to trust that [Renaissance] can handle the clean up."[12]

The affected communities and supporters are compelled to ask how Renaissance will be able to do that, given that the consortium is reliant on funding from SPDC. Shell has stated that, on completion, it "will provide secured term loans of up to USD 1.2 billion, to cover a variety of funding requirements."[13]

Clearly, the Shell's assertion to the UK High Commissioner defies logic: If Shell is not setting aside a substantial sum, running to many billions of dollars, to ensure a full cleanup to international best practice standards, and Renaissance cannot pay such funds – then who will?

The history of the energy transition is being written now. Shell's exit from the Niger Delta will, in this history, stand as perhaps the emblematic example of the global oil industry's irresponsible divestment strategy, passing toxic assets and liabilities to others. Unfortunately, the victims would be the hundreds of thousands of Niger Delta citizens forced to live with the vast pollution left by SPDC operations.

If there is no cleanup or remediation of environmental damage, we feel there is great risk that Shell plc will have greatly profited from Nigeria's oil resources and left the Niger Delta in a much worse state. Shell's name will be synonymous with one of the gravest oil industry pollution injustices in history.

The opaque deal to sell the SPDC's assets to Renaissance raises serious questions for Shell plc and for responsible shareholders and investors:

- Why was there no assessment of the oil spill liabilities undertaken by credible independent experts prior to the sale to Renaissance?
- Why did Shell not undertake any credible public consultation? It would be impossible to have assessed liability without engaging the communities who have made multiple legal claims against Shell, including in the UK courts.[14]
- Did Shell, as reported by the *Financial Times*, leverage its investment in offshore oil and gas to pressure Nigeria into signing off on a sale which the country's main oil industry regulator had rejected?[15]
- What funding did Shell provide to Renaissance for decommissioning and other liabilities, which could run to several tens of billions of dollars? If such funds exist, where have they been deposited, and what is the basis for their use?
- Why has the sale been so shrouded in secrecy?

The Niger Delta has become a rallying cry for justice in the energy transition and for making the Polluter Pays principle non-negotiable. Shell may have sold its Niger Delta assets, but we do not believe that any oil majors who profited from the Delta should be let off the hook. By all

legitimate means available, we will continue to pursue justice for the Niger Delta affected communities.

We urgently demand Shell plc to confirm if the company will fully clean up the vast pollution legacy associated with Shell Petroleum Development Company of Nigeria (SPDC) assets on the Niger Delta and share publicly how this essential clean up process will occur.

Sincerely,

195 representatives of Nigerian and international civil society organizations, community groups, and concerned citizens listed below

Citations:

- [1] https://www.shell.com/who-we-are/our-values.html
- [2] https://www.thecable.ng/breaking-fg-has-approved-our-acquisition-of-spdc-says-renaissance-africa
- [3] https://www.amnesty.org/en/documents/AFR44/017/2009/en
- [4] https://report.bayelsacommission.org
- [5] https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0205114
- [6] https://www.amnestyusa.org/wp-content/uploads/2018/03/DecodersReport.pdf
- [7] https://www.theguardian.com/global-development/2017/nov/06/niger-delta-oil-spills-linked-infant-deaths
- [8] https://centurypost.com.ng/breaking-environmentalists-rise-against-shell-ask-fg-to-stop-the-oil-giant-from-selling-assets-until-all-impact-concerns-on-niger-delta-are-addressed
- [9] https://saction.org/shell-must-clean-up-rumuekpe-before-divesting-community-insists
- [10] https://eiti.org/eiti-standard
- [11] https://www.reuters.com/markets/deals/nigeria-rejects-shells-13-billion-oil-asset-sale-thisday-reports-2024-10-16
- [12] https://www.newsroomnigeria.com/why-spdc-divestment-proposal-should-remain-rejected-heda; FCDO reference: EIR2024_18094
- [13] https://www.shell.com/news-and-insights/newsroom/news-and-media-releases/2024/shell-agrees-to-sell-nigerian-onshore-subsidiary-spdc.html
- [14] https://www.supremecourt.uk/cases/uksc-2018-0068
- [15] https://www.ft.com/content/a56fb99d-f95e-4e0f-9312-3b56e14a94fb

Signed by:

Nigerian organisations:

Accountability Lab Nigeria
AGWOMEN Ikot Ekpene
Centre for Children's Health Education, Orientation & Protection Nigeria
Centre for Renewable Energy & Action on Climate Change
Foundation for Environmental Rights Advocacy & Development Nigeria
Foundation for the Conservation of the Earth
Gbolekekro Women Empowerment & Development Organization

Health of Mother Earth Foundation

Human & Environmental Development Agenda Resource Centre

Ibom People Empowerment & Ecosystem Restoration Foundation

Kebetkache Women Development & Resource Centre

Lekeh Development Foundation

Lokiaka Community Development Centre

National Association of Ijaw Female Students Alumnae

Neighbourhood Environment Watch Foundation

OLEGH Centre for Community Development

Peace Point Development Foundation-PPDF

Policy Alert

Procurement Observation & Advocacy Initiative

Social Action Nigeria

Women in Action for Positive Development and Gender Enhancement Centre (WAPDAGEC)

International:

198 methods

350 Dallas

350 Kishwaukee

350 New Orleans

350 Seattle

350.org

350Hawaii

A Community Voice Louisiana

AbibiNsroma Foundation

Accelerate Neighborhood Climate Action

Activists for Climate Justice Initiative

Africa Climate & Health Alliance

African Coalition on Green Growth

African Industrial Solution

Allegheny County Clean Air Now

Animals Are Sentient Beings

AnsvarligFremtid

Bargny Coast Waterkeeper

Beaver County Marcellus Awareness Community

Beaver County PA Peace Links

Beaverdam Green Team

Berliner Wassertisch

Better Path Coalition

Between the Waters

Both ENDS

Breathe Easy Susquehanna County

Businesses for a Livable Climate

Call to Action Colorado

Campax

Canadian Interfaith Fast for the Climate

Canadian Voice of Women for Peace

CatholicNetwork US

Center for Coalfield Justice

Centre for Citizens Conserving Environment & Management (CECIC)

Cherokee Concerned Citizens

Climate Action for Lifelong Learners

Climate Civics International

Climate Organizing Hub

Climate Reality Northeast Pennsylvania

Climate Reality Project Susquehanna Valley PA

Climate Stick Project

Colorado Businesses for a Livable Climate

Community Conciliation and Development Initiative

Community Development Advocacy Foundation

Community for Sustainable Energy

Concerned Citizens of St. John

Connected Advocacy

Connecticut Citizen Action Group

Corner House

Deignan Institute for Earth & Spirit at Iona University

Delaware-Maryland Synod of the Evangelical Lutheran Church in America Creation Care Ministry

Team

Earth Ethics

East African Crude Oil Pipeline Host Communities

Ecologistas en Acción

EKOenergy ecolabel

Emmaus International

Endangered Species Coalition

Endgame Strategy

Extinction Rebellion Netherlands

Fair Finance International

Faith Lutheran Church of Cockeysville MD Green Team

Fossielvrij Netherlands

Fox Valley Citizens for Peace & Justice

Frack Free Aotearoa New Zealand

FracTracker Alliance

Gender Action

Global Alliance for Incinerator Alternatives Africa

Greater New Orleans Housing Alliance

Greater New Orleans Interfaith Climate Coalition

Green House Connection Center

Green Party of McKean County PA

GreenFaith

Habitat Recovery Project

Hann Baykeeper

Hawkmoth

In the Shadow of the Wolf

Inclusive Louisiana

Indivisible Ambassadors

Initiativkreis Energie Kraichgau

Inland Ocean Coalition

Innovation pour le Développement et la Protection de l'Environnement

Institute for Policy Studies Climate Policy Program

Interstate 70 Citizens Advisory Group

Just Share

Justice 4 Nigeria

Justice Institute Guyana

Justice, Peace & Integrity of Creation Franciscans Africa

Kallop Humanitarian & Environmental Center

Knit Together Initiative

Koalisi Rakyat Untuk Hak Atas Air

Larimer Alliance for Health, Safety, & Environment

Lehigh-Pocono Committee of Concern Peace Center

Les Amis de la Terre / Friends of the Earth France

Linha Vermelha / Red Line

Littleton Business Alliance

Long Island Progressive Coalition

Louisiana Bucket Brigade

Louisiana League of Conscious Voters

Mac-Jim Foundation

Mahabahu

Maine Unitarian Universalist State Advocacy Network

MARBE SA Costa Rica

Mayfair Park Neighborhood Association

Mental Health & Inclusion Ministries

Mind's Eye Productions

Montbello Neighborhood Improvement Association

Mossville Environmental Action Now

Mothers Rise Up

Multicultural Educational Development Trust

Nature Talk Africa

Nordic Center for Sustainable Finance

North American Climate, Conservation & Environment

North Range Concerned Citizens

Northeast Pennsylvania Green Coalition

Nuclear Energy Information Service

Oil & Gas Action Network

Oil Change International

Oilfield Witness

Oilwatch International

Our Sacred Earth

Pakistan Fisherfolk Forum

Phil Peace-Building Foundation

Physicians for Social Responsibility Pennsylvania

Plastic Pollution Coalition

Progressives for Climate

Protect All Children's Environment

Public Citizen

Putnam Progressives

re•generation

ReCommon

REK Rowlands & Partners

Réseau des Associations pour la Protection de l'Environnement et de la Nature

San Antonio Bay Waterkeeper

San Diego 350

San Luis Obispo Clean Water

Save Our Susquehanna

Save RGV

Save the U.S. Environmental Protection Agency

Shifting Advocacy

Small Business Alliance

SoCal 350 Climate Action

Social Action International

Solidarité Ci Sutura

South East Communities Against Pollution

South Texas Environmental Justice Network

Southern Africa Climate Change Coalition

Southwest Organization for Sustainability

Spirit of the Sun

Stichting Onderzoek Multinationale Ondernemingen (SOMO)

Strategic Response on Environmental Conservation

System Change Not Climate Change

Texas Campaign for the Environment

The Environment & Conservation Organisations of New Zealand

The Firm of Rose & Associates

The People's Justice Council

The YEARS Project

TIAA-Divest!

Turtle Island Restoration Network

Union of Concerned Scientists

Unitarian Universalists for a Just Economic Community

Unite North Metro Denver

United Native Americans

urgewald

Veterans For Peace Phil Berrigan Memorial Chapter of Baltimore MD

Vivek Training Academy

Wall of Women

Western Slope Businesses for a Livable Climate

Women Development Action Initiative

Women's International League for Peace & Freedom Canada

Womxn from the Mountain
Youth for Green Communities
Zadok Foundation
Zimbabwe Climate Change Coalition