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SOCIAL DEVELOPMENT ORGANISATION

RESEARCH PAPER

on

Bridging the Gap in Community Development Agreements and Multilevel Governance in Enugu's Coal Mining Sector

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Abstract

This paper builds upon the initial research submitted to the High-Level West Africa Conference on Natural Resource Governance and Energy Transition, which explored the regulatory and implementation challenges surrounding Community Development Agreements (CDAs) in Nigeria's solid minerals sector. Focusing on Awhum in Udi Local Government Area of Enugu State, this study deepens the investigation through field-based insights, document review, and qualitative interviews with key stakeholders.

The Nigerian Minerals and Mining Act of 2007 mandates CDAs to ensure that host communities benefit from mineral extraction. However, preliminary hypotheses previously shared with this conference indicated that CDAs in Enugu were either absent or poorly developed, with federal agencies perceived as remote, and state and local governments largely excluded from formal oversight roles. This full study confirms those concerns through expanded key informant interviews with officials from the Ministry of Environment and Climate Change, the Ministry of Water Resources, civil society actors, and residents of Awhum.

Recent developments since the abstract submission, including the ₦1 billion payment by Millhouse Energy Services Ltd to the Enugu State Environmental Remediation Trust Fund and an additional ₦100,000-per-truck royalty agreement, were found to be mediated by the state government in response to community backlash. These were not part of formal CDA implementation but emerged from an improvised dispute resolution process. Community members reported signing initial agreements without clarity, only realizing the scale of extraction and impact on their community environment after operations began. This triggered a revolt and subsequent state-led renegotiation.

While the company has promised projects like a hospital and road maintenance, these benefits remain unfulfilled, lack legislative backing, and fall short of long-term inclusion frameworks. The study finds that CDAs remain informal, weakly monitored, and largely unenforced, with no legal requirement for community oversight or state legislative codification. Furthermore, attempts to conduct Focus Group Discussions (FGDs) failed due to fear of retaliation and knowledge gaps among local actors, further highlighting the systemic opacity surrounding extractive governance.

This paper argues that the persistence of top-down implementation, coupled with a lack of formal roles for state and local actors, continues to erode trust and undermine the intended

benefits of CDAs. It recommends specific reforms: the amendment of Nigeria's Minerals and Mining Act to recognize subnational governments as formal actors in the CDA process; mandatory public disclosure of CDAs and royalty flows; and the establishment of community-led monitoring frameworks with legal backing. Without such reforms, the current model risks perpetuating a pattern where development is incidental rather than intentional.

1. Introduction

Coal mining has long shaped the social, economic, and physical landscape of Enugu State. Its origins date back to 1909, when British geologist Albert Kitson discovered coal at Udi Ridge. The launch of Ogbete Mine in 1916, alongside the construction of a railway linking Enugu to Port Harcourt, rapidly positioned Enugu as the coal capital of West Africa. By the late 1960s, coal output exceeded 588,000 metric tonnes annually, powering trains, industries, and urban infrastructure.

However, the industry's rise was marred by critical setbacks. The 1949 Iva Valley massacre, where colonial police killed 21 miners during a strike, exposed deep labour and governance tensions. The discovery of oil in Oloibiri in 1956 shifted national energy priorities, and the Nigerian Civil War (1967–1970) destroyed key coal infrastructure. By the early 2000s, most Enugu mines - including Iva Valley and Onyeama - were abandoned or formally decommissioned.

A quiet resurgence began around 2022, with coal extraction resuming at sites like Awhum, Nsude, Akwuke, and Amankwo Inyi - often outside robust regulatory oversight. Firms such as Millhouse Energy Services Ltd and African Pits & Quarries re-entered the sector, prompting fresh controversy. Host communities reported exclusion from decision-making, coerced consent, unfulfilled obligations, and serious environmental degradation - raising questions about the equity and legality of the new coal economy.

Nigeria's Minerals and Mining Act (2007) mandates that companies enter into Community Development Agreements (CDAs) with host communities to ensure benefit-sharing and local development. However, in practice, CDA implementation is often opaque and inconsistent. Communities lack negotiation capacity, many CDAs are verbal or poorly documented, and regulatory bodies like MIREMCO remain largely inactive or under-resourced.

This study examines the governance of CDAs in Enugu's re-emerging coal sector, with a focus on Awhum in Udi LGA. It explores how mining firms, community actors, and state

institutions understand and apply CDA provisions. Through interviews with state agencies, civil society, and community members, the research investigates whether current governance practices meet standards of participation, transparency, and accountability, and identifies institutional weaknesses limiting inclusive development.

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2. Background and Literature Review

2.1 Origins and Decline of Coal Mining in Enugu

Coal mining has played a pivotal role in shaping the socio-economic development of Enugu State. The industry originated in 1909 with the discovery of coal by British geologist Albert Kitson in the Udi Hills, and industrial extraction began in 1916 following the construction of the Port Harcourt–Enugu railway. This infrastructure enabled large-scale export, transforming Enugu into the regional hub of coal-powered development. Major mines, including Ogbete, Onyeama, Iva Valley, and Okpara, were managed by the Nigerian Coal Corporation (NEITI, 2022).

By 1967, annual coal production exceeded 588,000 metric tonnes, making Enugu central to West Africa's colonial and post-colonial energy supply chains. However, a series of disruptions led to the industry's collapse. The Iva Valley massacre of 1949, in which 21 miners were killed during a strike, exposed fractures in labour governance. The discovery of oil in Oloibiri (1956) redirected energy investments, and the Nigerian Civil War (1967–1970) devastated mining infrastructure. Post-war years saw deep institutional neglect and financial withdrawal, and by the early 2000s, formal mining operations in Enugu had largely ceased.

Yet, the legacy of coal mining remains visible. Many retired miners from areas like Iva Valley continue to suffer respiratory ailments, often without compensation or pension benefits. Oral histories and advocacy reports reflect deep community resentment, underscoring the unresolved social costs of coal extraction. Historic structures like the Colliery Quarters (built 1924) endure as symbols of both industrial ambition and abandonment.

2.2 Governance of Solid Minerals and CDAs

The Nigerian Minerals and Mining Act (2007) mandates that mining firms enter into Community Development Agreements (CDAs) with host communities before extraction begins. These agreements are meant to ensure local benefit through provisions such as infrastructure, social services, and environmental safeguards (NEITI, 2023). This principle

aligns with the Africa Mining Vision (2009), which emphasizes inclusive participation, transparent revenue flows, and value addition in mineral-based economies.

However, implementation remains uneven. Across Nigeria, and in Enugu specifically, weak regulatory enforcement, limited community legal capacity, and opaque negotiations continue to undermine CDA effectiveness. Companies like Millhouse Energy Services Ltd have reportedly signed CDAs in Udi LGA, but many such agreements were verbal, poorly documented, or negotiated without broad community consultation (Punch, 2023; Advocate News Nigeria, 2023).

In response to escalating local dissatisfaction, the Enugu State Government imposed a ₦1 billion remediation levy and introduced escalating per-truck royalty fees (from ₦100,000 to ₦800,000). While this marks an attempt at policy responsiveness, these actions have not been anchored in legislation or supported by clear implementation guidelines.

A notable institutional gap is the dormancy of MIREMCO (Minerals Resources and Environmental Management Committee) in Enugu. Created under the Mining Act as a multi-stakeholder oversight body, MIREMCO is meant to include representatives from federal and state ministries, host communities, and civil society. Yet, field interviews revealed widespread unawareness of its presence or function, indicating a critical breakdown in localized mining governance.

2.3 Community Agreements and Perceived Exploitation

Field interviews in Awhum reveal that many residents lacked a clear understanding of the Community Development Agreements (CDAs) they were asked to endorse. Respondents described signing documents in the presence of state officials without legal representation, proper translation, or broad community engagement. A youth leader noted:

"We thought we were agreeing to something minor, just a few trucks. But when we saw more than ten trucks leaving every day, we realized the scale of what we had agreed to."

This gap between perception and the actual terms of the agreement has fueled frustration and resistance. Following community protests, the state government facilitated a compromise, with Millhouse Energy pledging to construct a hospital and renovate a primary school. However, these promises are not included in a binding CDA and instead fall under the company's voluntary corporate social responsibility efforts. The lack of legal clarity and enforceability continues to erode community trust.

This pattern reflects national trends in Nigeria's extractive regions, where CDAs are often signed under pressure or without informed consent (Okonta & Douglas, 2003; Obi, 2010). Interviews with civil society organizations confirmed that communities negotiate from structurally disadvantaged positions. Respondents highlighted the absence of grievance mechanisms and the lack of formal procedures for monitoring compliance with CDA and environmental obligations.

2.4 Institutional Response and Policy Gaps

While the Enugu State Ministry of Environment and Climate Change holds formal oversight responsibilities, field evidence suggests that regulatory interventions are largely reactive and triggered by public outcry rather than proactive institutional routines. Although an Environmental Remediation Trust Fund has been established, its operational structure and effectiveness remain unclear. As NEITI (2023) has noted in other subnational contexts, this crisis-driven governance model often leads to weak enforcement, superficial consultations, and policy failure.

The absence of MIREMCO's operational presence in Enugu, along with the non-disclosure of signed CDA texts, points to a broader institutional vacuum. The current governance framework lacks transparency and statutory coherence. In the absence of a dedicated state law that outlines the roles, responsibilities, and rights of host communities, mining companies retain broad discretion over how CDAs are negotiated and implemented.

Communities, in turn, must rely on informal agreements, fragmented negotiations, or occasional government interventions. This leaves them structurally disadvantaged and reinforces patterns of extractive injustice, where benefits are unpredictable and obligations remain unenforceable.

3. Methodology

This study employed a qualitative case study approach to examine how Community Development Agreements (CDAs) and subnational governance decisions have influenced coal mining outcomes in Enugu State. The analysis focused on Udi Local Government Area, a hotspot of renewed mining activity and contestation.

The research draws from stakeholder interviews, historical records, CDA-related documents, and government reports, enabling triangulation of perspectives across community actors,

corporate representatives, civil society organizations, and state institutions. Emphasis was placed on capturing both formal policy frameworks and lived experiences within affected communities, to assess the gap between legal intent and implementation on the ground.

3.1 Case Selection

Enugu State was selected for this study due to its historical significance as Nigeria's coal mining hub and its renewed relevance following the resurgence of mining activities in recent years. Within Enugu, Udi Local Government Area was chosen as the focal point, with specific attention to the communities of Awhum and Nsude.

These communities were selected based on their direct and recent engagement with mining companies, through both formal agreements and contested interactions. Their experiences offer valuable insight into the contemporary governance of Community Development Agreements (CDAs) and the socio-environmental dynamics surrounding coal extraction in the region.

3.2 Key Informant Interviews

Primary data was gathered through seven key informant interviews held between July 2025 and September 2025. The interviewees were selected based on their involvement in mining oversight, community representation, or advocacy. These included:

- An Assistant Director from the Enugu State Ministry of Environment and Climate Change
- Two officers from the Enugu State Ministry of Water Resources
- A staff of Federal Ministry of Solid Mineral Development, Enugu
- 6 members of the host communities
- Civil society organizations working on environmental and extractive governance in Enugu

The interviews were guided by open-ended questions and explored several themes. These included the process through which communities entered into agreements with companies, the level of state government involvement, the type of benefits promised or delivered, and how communities responded once mining began at scale. Interview notes were manually recorded and later coded for recurring themes and insights.

3.3 Document and Media Review

To complement the field interviews, the study undertook a targeted review of relevant documents and media sources. These included national legal instruments such as the Nigerian Minerals and Mining Act (2007), official press statements from mining companies, state government announcements, and public commentaries issued by civil society and advocacy organizations.

News articles were analyzed to assess how community protests, company activities, and government interventions were represented in the media. Special attention was paid to moments of conflict or regulatory action, which often revealed gaps between formal commitments and on-ground realities.

Despite repeated requests, official copies of the Community Development Agreements (CDAs) or memoranda of understanding between Millhouse Energy Services and host communities were not made available. This limited direct textual analysis of the agreements and underscores the broader issue of opacity in extractive sector governance.

3.4 Analytical Approach

Data collected from interviews, documents, and media sources were organized thematically to identify recurring patterns, emerging trends, and points of contradiction. Special attention was given to how state-level decisions have shaped community trust, perceptions of accountability, and the material outcomes of coal mining activities in Enugu.

Thematic findings were then analyzed in relation to national legal frameworks, such as the Nigerian Minerals and Mining Act, as well as international best practices in extractive governance. This comparative lens enabled the study to assess both the local dynamics of CDA implementation and their alignment with broader policy standards.

3.5 Limitations

This study encountered several constraints that affected data collection and depth of analysis. Although focus group discussions were initially planned in Awhum and Nsude, these could not be conducted. Many community members expressed reluctance to speak openly, citing concerns about personal safety or fear of retaliation.

In other cases, respondents lacked adequate knowledge of the agreements signed on their behalf, limiting the scope of informed responses.

4. Findings and Analysis

4.1 Signing of the CDA in Ignorance and Asymmetry

Interviews with key informants revealed that the initial Community Development Agreement (CDA) between Millhouse Energy Services Ltd and the Awhum community was not structured as a tripartite agreement. Instead, it was signed directly between the company and select community leaders, without formal participation from the state government.

A civil society representative noted:

"The villagers thought it was a normal community MOU. They didn't anticipate the scale of coal evacuation that would follow."

Community members, particularly youth leaders, reported that no legal or technical advisory support was provided during negotiations. There was no formal vetting, translation, or broader community consultation. This resulted in widespread misunderstanding of the agreement's scope and implications.

An Assistant Director at the Enugu State Ministry of Environment confirmed that the state had not been involved during the negotiation stage:

"They called us in only after the fallout."

This case illustrates how power asymmetries, information gaps, and procedural shortcuts in CDA formation can undermine community trust and fuel conflict.

4.2 Community Revolt and Government Mediation

Field data show that tensions escalated when community members discovered that 10 or more truckloads of coal were being evacuated daily, with no visible evidence of shared revenue or promised compensation.

A youth leader from Awhum noted:

"When we asked how many trucks were leaving daily and calculated the company's profit, we knew we had been cheated. That's when we protested."

This community revolt forced the state government to intervene. The Ministry of Environment and Climate Change convened meetings between the company, community stakeholders, and LGA representatives. As a result:

- The company agreed to revise its obligations
- It initiated the construction of a community hospital
- Additional basic amenities are reportedly underway

However, no formal re-negotiated CDA or legal amendment has been publicly disclosed as of the time of writing.

4.3 Limited Knowledge Within Government

Interviews with officers in the Ministry of Water Resources and CSO representatives revealed limited understanding of the legal provisions of CDAs, especially Sections 116–122 of the Nigerian Minerals and Mining Act (2007).

One water ministry officer admitted:

"We are not sure whether we're meant to enforce CDA clauses or just monitor environmental runoff. It's not clear."

This reinforces the broader institutional gap between federal policy and subnational enforcement, especially when communities lack both legal literacy and trusted intermediaries.

4.4 Environmental and Health Impacts Remain Critical

Despite new infrastructure promises, the community continues to suffer from unmitigated environmental effects such as gully erosion near mining corridors; worsened by runoff

CSOs noted that no Environmental Impact Assessment (EIA) or remediation plan has been shared publicly, a clear violation of statutory procedure.

4.5 Breakdown of Revenue Commitments

Initial company commitments included:

- ₦1 billion payment to Enugu State Environmental Remediation Trust Fund
- ₦100,000 per truckload as royalty to the state
- ₦20,000 per truckload to be shared within the host community

But:

- Only majority of community members who were interviewed claimed not to have heard of the ₦20,000 per truck benefit
- None could verify receipt or trace any distribution mechanism
- Community members expressed mistrust toward traditional authorities managing the funds

CSO informant:

"There's no audit trail. No publication. That fund is now a rumour."

5. Discussion

The findings from this study reveal a complicated mix of historical legacies, weak institutional frameworks, and uneven power dynamics that continue to shape coal mining governance in Enugu State. While recent efforts have aimed to formalize mining operations and introduce community development agreements, the process has exposed longstanding gaps in accountability, representation, and enforcement.

5.1 The Burden of History and Trust Deficit

Coal mining in Enugu is not new. Communities in Udi and beyond have lived through over a century of extraction, dating back to colonial-era mining in Ogbete, Iva Valley, and Onyeama. However, despite this long engagement with the industry, most residents have never experienced meaningful benefits. This history of neglect has built a deep trust deficit between government institutions, companies, and host communities. Interviews revealed that some older residents still carry memories of loss, injury, and environmental damage from the mining years of the 1950s through the 1990s. This historical trauma continues to influence how new initiatives, including the recent CDAs, are received.

5.2 The Community Development Agreement Gap

A major insight from this research is the limited understanding that communities have about the nature and implications of the CDAs they signed. In Awhum and Ibite, interviewees reported that the agreements were entered into hastily, often without legal counsel or community-wide consultation. Many did not realize the scale of coal extraction until truckloads began leaving daily, at which point resistance and protest followed. It was only after the community expressed dissatisfaction that the state government stepped in to mediate and renegotiate certain terms.

The CDA in question was signed directly between the community and Millhouse Energy Services, with promises of financial contributions and social projects. While the company has since renovated a primary school and begun constructing a hospital, community members still express uncertainty about how long these benefits will last or whether they reflect the true value of the resources extracted from their land.

5.3 State Role: Enabler or Arbiter?

State government actors have played an inconsistent role in the governance of coal mining. While the federal government retains primary control over mineral resources under the constitution, states influence mining through land allocation, environmental permits, and negotiation with communities. In the case of Enugu, the state has alternated between enabling extraction and responding to disputes after the fact. For instance, the intervention in Awhum was reactive, coming only after community tensions had escalated.

There is no clear legislative framework at the state level to define the role of communities in benefit-sharing, oversight, or grievance resolution. This has left a vacuum that companies can fill on their own terms. One senior state official admitted that his ministry had no formal guidelines for monitoring company compliance with CDAs or environmental obligations.

Of particular concern is the lack of visibility of the Mineral Resources and Environmental Management Committee (MIREMCO), a body mandated by the Nigerian Minerals and Mining Act (2007) to handle environmental and stakeholder issues at the state level. None of the stakeholders interviewed, including those from the Ministry of Environment and Climate Change, the Ministry of Water Resources, or the affected communities, made reference to any intervention or role played by MIREMCO. This omission suggests a significant implementation gap and raises questions about whether Enugu's MIREMCO is operational or sufficiently empowered to provide oversight in active mining sites.

5.4 Community Agency and Structural Limitations

The study also found that community members lack the tools and institutional support to advocate effectively for their rights. Most respondents from civil society emphasized that communities are often negotiating from a position of weakness, lacking legal advice or independent verification of what companies owe or deliver. In the absence of a legal mandate requiring community consent or oversight, CDAs become vague promises rather than enforceable commitments.

The fact that many residents were afraid to participate in focus group discussions is telling. It reflects not only fear of retaliation but also a sense that the system is opaque and unresponsive to their concerns. Without structured participation mechanisms, community voice remains fragmented and reactive.

5.5 Missed Opportunity for Inclusive Development

The situation in Enugu represents a missed opportunity to build a more inclusive model of mineral governance. Despite the existence of a 1 billion naira remediation fund and a per-truck royalty agreement, there are no transparent systems to track how these revenues are used. The state's failure to legislate or institutionalize community representation risks repeating the exploitative dynamics of the past, even under a new policy language.

Projects like the hospital in Awhum are positive steps, but without broader planning and legislative backing, they remain isolated interventions. What is needed is a coordinated governance framework that aligns company obligations, state oversight, and community agency. This should include public access to CDA documents, community involvement in monitoring, and channels for feedback or dispute resolution.

6. Conclusion

The coal mining resurgence in Enugu State, particularly in Udi Local Government Area, illustrates the fragile interface between resource governance, institutional responsibility, and community well-being. While recent investments by companies such as Millhouse Energy Services Ltd signal renewed economic interest in the sector, they also expose persistent governance shortfalls and systemic neglect of host community rights and expectations.

Evidence from this study reveals that Community Development Agreements (CDAs), though legally mandated, are often executed without adequate consultation, transparency, or follow-up mechanisms. In most cases, community representatives signed documents they neither fully understood nor helped to shape. This lack of clarity and oversight has fostered mistrust, stoked tensions, and undermined the legitimacy of both government and corporate actors.

The Community Development Agreement must move beyond symbolism to become a binding and enforceable tool for equitable development. It should ensure mining activities benefit host communities rather than fuel conflict. State governments must play an active role in oversight to guarantee transparency, accountability, and enforcement of CDA provisions.

Although state authorities have intervened in isolated cases - such as mediating conflicts and brokering corporate social responsibility projects - these interventions have largely been informal and reactive. The absence of a legislated framework defining roles, timelines, enforcement mandates, or grievance redress structures has weakened the efficacy of state action. Institutions like MIREMCO, designed to act as oversight bodies, have been effectively

absent from operational processes in Enugu, leaving a critical vacuum in multilevel mineral governance.

Moreover, the environmental and public health impacts associated with historical and ongoing mining continue to burden affected communities. Issues such as gully erosion, deforestation, and contamination of surface water sources like the Ekulu and Inyaba Rivers illustrate the long-term consequences of extractive operations conducted without integrated environmental management plans. Environmental protection should be treated as a legal and moral duty, not an option.

Without substantive reforms - anchored in law, institutional coordination, and genuine community participation - the current trajectory risks reproducing historical patterns of resource exploitation and exclusion. CDAs must evolve beyond symbolic compliance to become enforceable instruments of inclusive development. This requires not only government will but also legislative action, civic oversight, and transparent accountability frameworks.

With clear laws, empowered communities, and responsible state action, a just and sustainable coal economy in Enugu is not only achievable but essential. The case of Enugu's coal revival presents both a cautionary tale and a critical policy window. If properly harnessed, it can inform broader subnational resource governance reforms across Nigeria and similar contexts across the continent.

Recommendations

1. Enact a Binding State CDA & Mining Law

The Enugu State House of Assembly should enact a dedicated law on Community Development Agreements (CDAs) that clearly defines the rights and obligations of mining host communities, companies, and government actors. This legislation must mandate:

- Clear obligations, penalties, and timelines for all parties
- Community rights to information, consultation, and consent
- Pre-MOU consultations with legally recognized community representatives
- Mandatory legal review of CDAs before signing
- Structured dispute resolution mechanisms with defined timelines and penalties
- Public disclosure of all signed CDAs

Such legislation should be harmonized with the federal Minerals and Mining Act (2007) while respecting local governance dynamics and ensuring state-level enforcement capacity.

2. Establish a Multi-Stakeholder Oversight Committee

Operationalize and empower Enugu State's Mineral Resources and Environmental Management Committee (MIREMCO) to monitor, audit, and enforce CDA implementation. This committee should include:

- Representatives from state ministries (Environment, Justice, Water Resources)
- Elected community representatives from host mining communities
- Civil society organizations with expertise in extractive governance
- Mining company representatives
- Independent technical and legal advisors

The committee must conduct quarterly monitoring visits to mining sites, produce annual public reports detailing compliance with environmental, social, and financial obligations, and maintain early warning systems for CDA violations and environmental degradation. This would provide an institutional backbone for bridging federal oversight with grassroots realities.

3. Invest in Community Legal and Negotiation Capacity

Host communities must be equipped with the knowledge and skills necessary for informed, transparent engagement with mining companies. This requires:

- Provision of independent legal counsel during CDA negotiations
- Regular capacity-building workshops on mineral rights, environmental law, and negotiation
- Training on financial literacy and project monitoring
- Support for forming Community Monitoring Units (CMUs) to track extraction volumes and environmental compliance
- Access to technical advisors who can interpret complex contractual terms

Civil society organizations, in partnership with state government, should facilitate these interventions to ensure communities negotiate from positions of knowledge rather than vulnerability.

4. Tie a Fixed Share of Mining Revenues to Long-Term, Community-Led Development Projects

A defined percentage (e.g., 2–5%) of mining revenues should be legally earmarked for community-led development initiatives. This should include:

- Creation of a transparent Community Development Fund with public financial dashboards
- Community participation in identifying priority development projects (health, education, infrastructure)
- Regular audits and public reporting on fund utilization
- Long-term planning that extends beyond the operational life of individual mining projects
- Integration with broader state and local government development plans

An online public financial dashboard should track all royalty payments (e.g., ₦100,000 per truck), CDA obligations, and social project disbursements to ensure accountability and build trust between all stakeholders.

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