NIGERIAN INSTITUTE OF
ADVANCED LEGAL STUDIES

NIALS DIGEST

MAY, 2023

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NIALS DIGEST

May, 2023

MOTTO

Knowledge that makes the Difference.

OUR VISION

To be a world class institution that is the primary source of information, training and advice at the highest level of policy formulation on legal matters, effectively impacting on local and international institutions in the development of law.

NIALS ENABLING ACT

Commencement Establishment of the Nigerian Institute of Advanced Legal Studies

(1) There is hereby established an institute to be known as the Nigerian Institute of Advanced Legal Studies (in this Act referred to as "the Institute") which shall have the functions assigned to it by this Act.

(2) The Institute shall be a body corporate with perpetual succession and a common seal and may sue and be sued in its corporate name.

MEMBERSHIP OF THE COUNCIL, etc.

(1) There shall be established for the management of the affairs of the Institute a body to be known as the Nigerian Institute of Advanced Legal Studies Council (in this Act referred to as "the Council")

(2) The Council shall consist of the following members, that is
(a) a Chairman to be appointed by the President;
(b) a representative of the Federal Ministry of Justice;
c) a representative of the Federal Ministry charged with responsibility for higher education;
(d) six Deans or Heads of Faculties, or other formations

of Nigerian Universities offering degree courses in law at not less than post-graduate level, to be appointed by the President; the Director-General of the Nigerian Law School; one member of the Judiciary nominated by the Chief Justice of Nigeria; the President of the Nigerian Bar Association; five persons of whom one shall be a woman to be appointed by the President; and the Director-General of the Institute.

(3) The provisions of the Schedule to this Act shall have effect with respect to the proceedings of the Council and the other matters therein mentioned.

FUNCTIONS OF THE COUNCIL

(i) Council shall be responsible for the determination of the overall policy of the Institute and in particular for the financial and operational programmes of the Institute and for ensuring implementation of such policies and programmes.

(ii) Without prejudice to the generality of subsection of this section, it shall be the duty of the Council to approve the research and training programmes of the Institute, determine the fees to be paid for research, consulting, training and any other services that may be offered by the Institute and promote or undertake any other activity that in the opinion of the Council is calculated to help achieve the purposes of the Institute.

NIALS ANTHEM

Ever questioning,
Ever Probing,
Nigerian Institute of Advanced Legal Studies!
Vision foretold by founding fathers,
Ideas nurtured by patriotic fervor,
Urging us to make the difference,
And be the nucleus of legal studies,
With passion and hope our mandate deliver,
And be the best that we can be,
A truly world class institution,
Nigeria's law abode!

SPECIALIZED TRAINING

The Nigerian Institute of Advanced Legal Studies organized a specialized workshop for staff of ECOWAS on *Emerging Tools and Techniques, Use of Dewey Decimal Classification Scheme (DDC), Indexing and online Printing of Cataloguing Cards 4, 5 and 8 May 2023*. The workshop was *held* at the Lagos office of the Institute.





COURTESY VISIT

The Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan, PhD on Friday, 5th May, 2023 played host to the Palestinian Ambassador to Nigeria, His Excellency Ambassador Abdullah M. A. Shawesh at his Abuja office, Supreme Court Complex.

Four (4) areas of collaboration were identified during the visit. These include Academic Exchanges, Research Cooperation, Capacity Building Programs, and Joint Initiatives in the Field of Legal Studies. The meeting provided an opportunity for both parties to discuss and establish a foundation for future collaborations.

The visit highlighted NIALS' commitment to fostering international partnerships and promoting knowledge sharing with countries around the world. Collaborating with Palestine will allow for the exchange of ideas, experiences, and expertise, contributing to the growth and development of the legal profession in both nations.

The meeting marks a positive step towards strengthening ties between NIALS and Palestine, fostering mutual understanding, and advancing legal studies.







PROJECT COMMISSIONING

The Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan, PhD on Saturday, 6th May, 2023 Chaired the Project Commissioning and handing over of a completed Junior Secondary block of classrooms, toilet facilities and a borehole to the Kochingoro community, Airport Road, Abuja. Present at the event were the immediate past Honorable Minister of Finance, Hajia Zainab S. Ahmad as the Honoree and the immediate past Honorable Minister of Women Affairs, Dame Pauline Tallen.





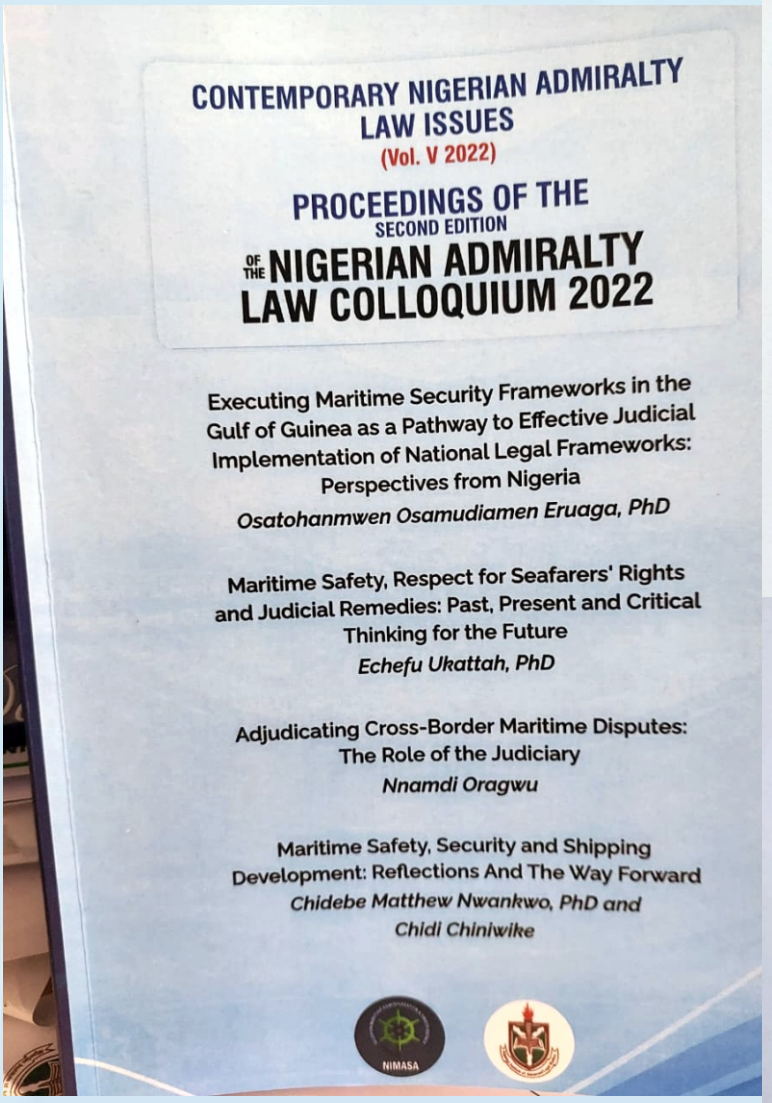


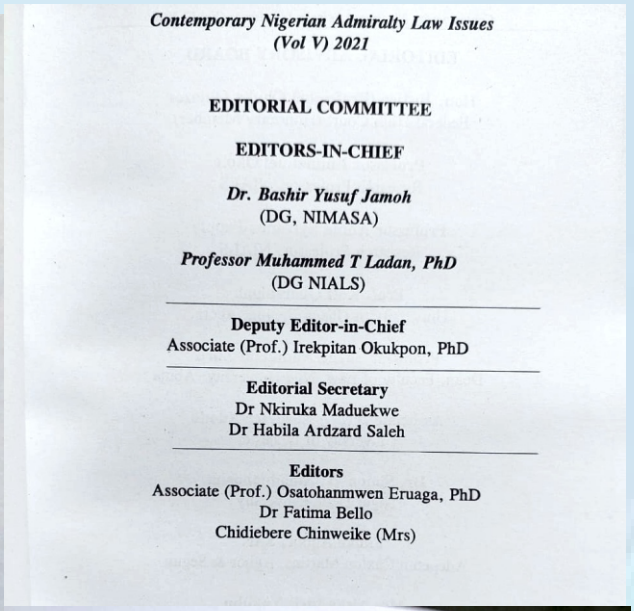


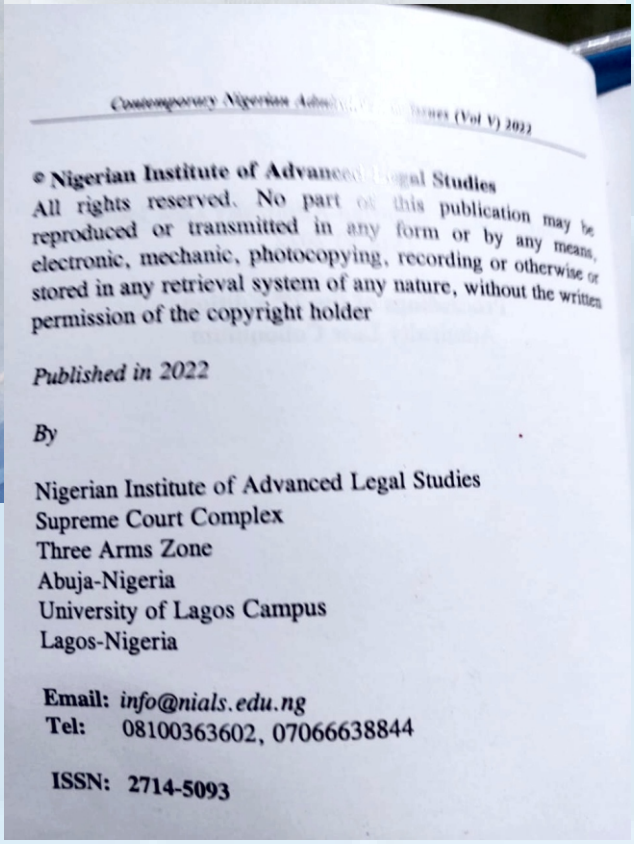


NEW PUBLICATION

Contemporary Nigerian Admiralty Law Issues (Vol. V 2022)







THE AFRICAN CONTINENTAL FREE TRADE AREA AGREEMENT (AFCFTA) AND THE LEGAL PROFESSION IN AFRICA

On 9th May 2023, the Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan, PhD with Professor Melaku Desta, Coordinator, African Trade Policy Centre, United Nation Economic Commission for Africa, Addis Ababa, Ethiopia, as the Keynote Speaker, hosted a Hybrid Lecture organized by the Nigerian Institute of Advanced Legal Studies on *the African Continental Free Trade Area Agreement and the future of Legal Profession in Africa. Other discussants include Assoc. Prof. Francesca Nlerum HOD Commercial Law Dept. NIALS and Leonard Otuonye Ugbaja.*

In person participation took place at the office of the Director General, Supreme Court Complex, Abuja between 1:00pm and 3:00pm. The lecture was attended virtually by over one hundred (100) participants from the United States of America, United Kingdom, India, Jamaica, South Africa, Ghana, Nigeria, Ethiopia, Senegal, Kenya, Italy, etc.















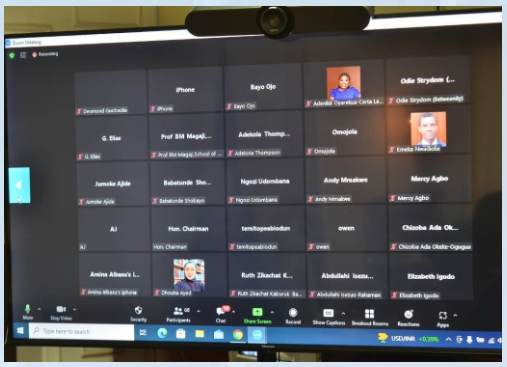






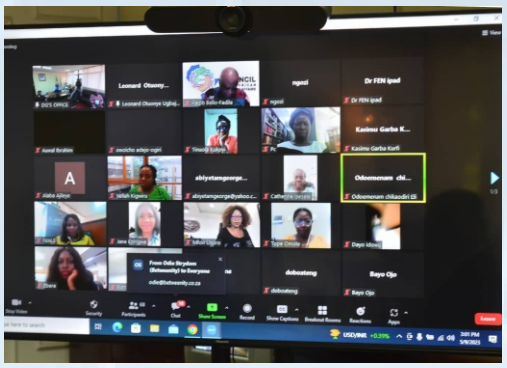










CHIEF JUSTICE OF NIGERIA AND HEADS OF COURTS AT THE NIALS/MACARTHUR FOUNDATION REVIEW MEETING OF REPORT ON JUDICAL APPOINTMENT, SELECTION AND ELEVATION IN NIGERIA

On Tuesday, 9th May 2023, the Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan PhD, with other notable jurists, attended a One-Day NIALS/MacArthur Foundation Technical meeting on the *Review of the National Judicial Policy and Guidelines on the Appointment/ Selection and Elevation of Judges in Nigeria*.

This one-day meeting focused on the review of the National Judicial Policy and Guidelines concerning the appointment, selection and elevation of judges in Nigeria.

It also provided a platform for these esteemed individuals to share their expertise, exchange insights and contribute to the ongoing review process of the national judicial policy. The MacArthur Foundation's involvement highlighted the significance of collaborative efforts in shaping the guidelines for judicial appointments in Nigeria.

The meeting underscored the commitment of NIALS and the MacArthur Foundation to improving the Nigerian judiciary by ensuring transparent and merit-based processes in the appointment and elevation of judges. The input and expertise of the attendees will contribute to the development of robust guidelines that promote fairness, competence, and integrity within the judicial system.

Notable dignitaries present at the meeting were Chief Justice of Nigeria, the Honorable Justice Olukayode Ariwoola, Chief Judge of Federal High Court, the Honorable Justice John Tsoho, the President of the National Industrial Court of Nigeria, Honorable Justice Dr. Ben Kanyip, Chief Adegboyega Awomolo SAN, Honourable Justice Buba Rtd of the Federal High Court the Executive Secretary of the National Judicial Council, Gambo Saleh. Others include, President of the Federal Capital Territory Customary Court of Appeal, Abuja as well as professors of Law: Prof. Ameze Guobadia, Prof. Yusuf Dankofa, Prof. Chris Wigwe, Prof. Peter Akper SAN, Prof. Adebambo Adewopo Anthony SAN, Prof. Ibe Ifeakandu, and NIALS/MacArthur Foundation Technical Experts and Dr. Osato Eruaga were also present. The meeting was held at the Council Chambers of the National Judicial Council, Abuja (NJC).


















WORKSHOP ON LEGAL INFORMATION SERVICES IN LAW LIBRARIES

Some principal officers, coordinators and participants of Nigerian Institute of Advanced Legal Studies participated at the 23rd National workshop on Legal Information Services in Law Libraries held from Tuesday, 9th to Wednesday, 10th May, 2023 at Lagos office.



3RD NIGERIAN ADMIRALTY LAW COLLOQUIUM

Nigerian Institute of Advanced Legal Studies (NIALS), Nigerian Maritime Administration and Safety Agency (NIMASA), alongside the National Judicial Institute (NJI) held her 3rd Nigerian Admiralty Law Colloquium with the theme *Beyond Maritime Security Threat in the Gulf of Guinea: Harnessing the Gains of a Secured Maritime Domain*.

Dignitaries present at the colloquium were the Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan, PhD, Honorable Justice Musa D. Muhd of the Supreme Court/ Representative of the Chief Justice of Nigeria. Justices of the Court of Appeal: Honorable Justice Muhammed Shuaibu, Honorable Justice Biobele Georgewill, Honorable Justice Ali Babandi Gumel, Judges of the Federal High Court including Honorable Justice Yinka Faji, representative of the Chief Judge of the Federal High Court, participants from the investigating and prosecuting Agencies like the Nigerian Navy and Economic Financial Crime Commission (EFCC), the Administrator of National Judicial Institute, Honorable Justice Salisu Garba. Also, resource persons in attendance at the event were Mrs Mfon Usoro, Mrs Oritse Edodo-Emore, Dr. Emeka Akagbogu, Mr. Matthew Egbadon, Navy Commander Obiora Bede Anyikwa, Dr. Osato Eruaga, amongst others.

The event was held from Wednesday, 10th to Thursday, 11th May, 2023 at the Radisson Blu Anchorage, Victoria Island, Lagos State.













The NIALS/NIMASA/NJI 3rd Admiralty Law Colloquium organizing team







APPOINTMENTS

The Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan, PhD on Thursday, 11th, May, 2023 approved the appointments of the following staff respectively;

1. Associate Professor Osato Eruga as the Deputy Director CLECREIP (Monitoring and Evaluation)
2. Associate Professor Helen C. Okoro as the Deputy Director, Postgraduate Studies (Monitoring and Evaluation)
3. Kemi Omadanisi as CLE-Lagos, Assistant Coordinator (Administration and Operations)
4. Ruth Bamiduro as CLE-Lagos, Assistant Coordinator (Logistics)

Professor Ladan conveyed his approval through the Institute Secretary, Tiamiyu Sharafadeen as their appointments is with immediate effect. The DG's appointments signifies his dedication to enhancing the administrative, operational, and academic functions of the Institute in ensuring efficient coordination and monitoring across various departments.

PROPOSED IN-HOUSE CAPACITY BUILDING WORKSHOP FOR ALL NON ACADEMIC STAFF/ ACADEMIC STAFF BELOW THE RANK OF PROFESSOR

The Director General, Professor Mohammed Twafiq Ladan PhD on Friday, 12th day of May 2023 requested the Principal Officers of the Institute; Institute Bursar, Mr John Yawe, Institute Secretary, Mr Tiamiyu Sharafadeen and Institute Librarian Professor Anyaogu Uluocha to meet with non-academic Directors (Admin/Press, Bursary/Audit) for a hybrid meeting on the 30th of May, 2023.

The purpose of the meeting is to create a four-day in-house capacity building workshop for all non-academic staff, which will be held physically in Lagos and Abuja. During the proposed meeting, they will also discuss a two-day management workshop for the non-academic Directors.

Furthermore, the Director of Research (DR) is assigned to review a zero draft proposal prepared by Profs Emily and Udombana. This proposal is for a workshop aimed at all academic staff below the rank of a professor, while the professors themselves will serve as resource persons.

MLA 2023 CONVENTION

The Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan, PhD attended the Mutual Legal Assistance (MLA) Diplomatic Conference on the Draft Convention on International and Cooperation in Investigation and Prosecution of International Crimes: *Crimes against Humanity, Genocide, War Crimes, etc*.

In his oral intervention during the plenary session on Day 1, Professor Ladan lauded the efforts of the six (6) core member states and the host member state, Slovenia for the opportunity to consider the historic and practical Convention and International cooperation against impunity as well as advancing the course of International Criminal Justice.

The DG reminded the gathering that Nigeria as part of its commitment will continue to demonstrate its International commitment in support of fighting impunity as covered in the Geneva Convention of 1949 and its two (2) Protocols of 1977. Also as part of its commitment at the Domestic level, Nigeria has put in place three (3) critical instruments recently; Extraction Amended Acts 2018, Transfer of Convicted Persons Enactment Enforcement Acts 2013 and the Anti-Torture Acts, 2017.

The MLA Initiative, is an initiative led by Slovenia, Argentina, Belgium, Mongolia, the Netherlands and Senegal for the adoption of the Convention on International Cooperation in the Investigation and Prosecution of Genocide, Crimes against Humanity, War Crimes and International Crimes. The MLA Initiative which operates as a stand– alone Process, outside of the UN forum emerged after the expert meeting organized by the Netherlands, Belgium and Slovenia in the Hague in November 2011 had confirmed a legal gap in the mutual legal assistance and extradition between States for the national adjudication of Genocide, Crimes against Humanity and War Crimes. The core group of States leading the MLA Initiative was later enlarged with Argentina, Senegal and Mongolia.

The event held from 15th to 26th May, 2023 at Slovenia.





The DG of NIALS, Prof M. T. Ladan, PhD with Head of Delegation to the MLA Diplomatic Conference in Slovenia, Nigerian Ambassador to Romania, Dr. Safiya Nuhu and Mr. David, Diplomatic Staff of the Nigerian Embassy in Romania on Day 3 of the conference











The DG of NIALS, Prof M. T. Ladan, PhD with Head of Delegation to the MLA Diplomatic Conference in Slovenia, Nigerian Ambassador to Romania, Dr. Safiya Nuhu and Mr. David, Diplomatic St

ECOWAS COURT OF JUSTICE 2023 CONFERENCE

The Director General of Nigerian Institute of Advanced Legal Studies, Professor Muhammed Tawfiq Ladan, PhD was a participant at the 2023 Economic Community of West African States (ECOWAS) Court of Justice Conference with the theme *ECOWAS Zero Tolerance for Unconstitutional Change of Government*.



Prof. M.T. Ladan, DG of NIALS with the keynote speaker, Professor Chidi Odinkalu (Ex-Chairman, National Human Rights Commission of Nigeria) in Banjul, Gambia 1



Prof. M.T. Ladan, DG of NIALS with the Chief Justice of Gambia, Honorable Justice Abubakar Jallow, at the ECOWAS Court of Justice International Conference in Banjul, Gambia.

The International conference which was held from Monday, May 22, 2023 to Friday, May 26, 2023 at Banjul, Gambia was declared open by the Gambian President, Adama Barrow, and the Keynote Speaker was Professor Chidi Odinkalu (Ex-Chairman, National Human Rights Commission of Nigeria).

The Conference had six sub-themes which includes; The Role of National Courts and the ECOWAS Court of Justice in Upholding Human Rights, Rule of Law, and Constitutional Democracy, Peace, and Security: Duty of member States to Respect, Protect and Fulfil Human Rights Obligations, and the Enabling Environment for ECOWAS Integration; ECOWAS Community Law in Perspective.

Presenters and attendees included Justice Ministers and Attorney Generals, Eminent Judges and Lawyers from ECOWAS member States, as well as Constitution, Governance, Human Rights and Election experts.

Professor Ladan in his presentation on the sub-theme *Issues and Challenges in the Enforcement of Judgements of ECOWAS Court of Justice* stated that the ECOWAS region appears to be living up to a notorious reputation as the coup zone of Africa with more seven failed and successful military coups within three years and the rapid erosion of democracy in member states. The DG identified four critical roles for the ECOWAS Court in Zero Tolerance for Unconstitutional

Change of Government, five key challenges relating to poor compliance rates or judgment enforcement and proposed eight recommendations moving forward to addressing the challenges of member states poor compliance regime with the courts decisions. Professor Ladan maintained that the four-day conference will address the myriad of governance challenges.





Prof. M.T. Ladan, DG of NIALS with the President of ECOWAS Court of Justice, Honorable Justice Edward A. Asante at the opening session of ECOWAS Court of Justice International Conference





AN APPRAISAL OF THE JUDGEMENT ENFORCEMENT MECHANISM OF THE ECOWAS COURT OF JUSTICE

BY
PROF. MUHAMMED TAWFIQ LADAN (PhD) PROFESSOR OF LAW, HUBERT HUMPHREY FELLOW USA, MEMBER, WORLD JURIST ASSOCIATION, DIRECTOR GENERAL, NIGERIAN INSTITUTE OF ADVANCED LEGAL STUDIES, ABUJA/LAGOS

BEING
A PRESENTATION MADE AT A 4-DAY INTERNATIONAL CONFERENCE

ORGANIZED
BY
THE ECOWAS COURT OF JUSTICE.

THEME: - ECOWAS' ZERO TOLERANCE FOR UNCONSTITUTIONAL CHANGE OF GOVERNMENT.
DATE: - 22 TO 25TH MAY 2023
VENUE: - BANJUL, THE GAMBIA

AN APPRAISAL OF THE JUDGEMENT ENFORCEMENT MECHANISM OF THE ECOWAS COURT OF JUSTICE

BY
PROF. MUHAMMED TAWFIQ LADAN (PHD) PROFESSOR OF LAW, HUBERT HUMPHREY FELLOW USA, MEMBER, WORLD JURIST ASSOCIATION, DIRECTOR GENERAL, NIGERIAN INSTITUTE OF ADVANCED LEGAL STUDIES, ABUJA/LAGOS

INTRODUCTION

The ECOWAS Community Court of Justice (ECCJ) is an integral key component and an organ of the regional economic integration body in West Africa as clearly enshrined in the 1991 Protocol, which came into force in 1996. Having provided for an ECOWAS Court, the 1991 Protocol mandated it to resolve disputes between community Member States, interpret Community Rules and issue advisory opinions to the Member States and institutions. The ECOWAS Revised Treaty of 1993 also provided for the establishment of the ECOWAS Court, the Judgements of which are to be binding on all Member States, Community institutions, individuals, and corporate bodies. It also provided that a related protocol would set out the modalities for the functioning of the court. The ECCJ was established by virtue of Article 6 of the Revised Treaty of ECOWAS, 1993 and the Protocol (A/P1/7/91) on the Community Count of Justice 1991, as amended by the supplementary Protocol of 2005, with a 4-fold mandate as a Community Court, an Administrative Tribunal, an Arbitration Tribunal and a Human Rights count.

The amendment of the 1991 Protocol by the 2005 Supplementary Protocol, expanded Jurisdiction of the Court to adjudicate on cases of human rights violations that occur within the jurisdiction of the Member States, which has enabled the Court to utilize its powers to ensure the protection of the human rights of ECOWAS Citizens. Furthermore, the Protocol, as amended by the 2005 Supplementary Protocol, has eliminated the limiting requirement of the exhaustion of local remedies in most international tribunals / courts, thereby facilitating the timely dispensation of justice to victims of human rights violations in the West African region.

It is in the above context that the ECCJ has a critical role to play in upholding the Rule of Law as a Supranational Court of ECOWAS, to enthrone participatory democracy in West Africa and to support the community within its judicial mandate to put an end to the era of unconstitutional governments firmly in its past and to ensure appropriate sanction of any unconstitutional change of government, consistent with the Community law, particularly, the 2001 ECOWAS Protocol on Democracy and Good Governance, a Supplementary instrument to the 1999 Protocol on the Mechanism for Conflict Prevention, Management, Resolution, Peacekeeping and Security.

It is against this background that this paper seeks to achieve the following objectives: -

i. Clarify the meaning of, and mechanisms for, Implementation, Compliance, monitoring and Enforcement of ECCJ and African Human Rights Court decisions/judgements in a comparative context;

ii. Underscore the fact that Judgements of ECCJ are Supranational judgements, NOT foreign Judgements;

iii. Assess the effectiveness criteria of ECCJ judgements; and

iv. Identify challenges and propose the way forward in strengthening. ECCJ's Enforcement mechanism.

1. CLARIFYING THE MEANING OF, AND MECHANISMS FOR, IMPLEMENTATION, COMPLIANCE, MONITORING AND ENFORCEMENT OF ECCJ AND AFRICAN HUMAN RIGHTS COURT'S DECISIONS / JUDGEMENTS

1.1. Clarification of key terms: - Implementation, Monitoring, Compliance and Enforcement

I. Implementation: - Implementation of supranational Court's decisions/judgements refers to the process by which individual or collective measures are taken (through legislation, Judicial decisions, administrative action, executive decree or other steps) to give effect to an adverse judgement or decision. Implementation refers to the actual steps or measures taken by a State to give effect to the decisions of the Court. It is also about adherence to the Judgement of the Court. Implementation can be partial or full; partial when a state gives effect to some but not all aspects of the decision of Court, and full when a State ensures that all aspects of the decision are satisfied.

The implementation of ECCJ and other international courts' judgements is the central measure of a count's efficacy. Without it, the situation of those who should be helped by the court's decision does not improve. Even the best and most profound Jurisprudence may be deemed ineffective if not implemented, and the very legitimacy of the court itself may fall into question. The commitment to abide by a Court's judgement is crucial to the integrity of any legal system, domestic or international. In fact, an assessment of challenges facing the ECCJ, African Human Rights Court, the European and the Inter-American human rights Courts revealed, that implementation of judgements is the acid test of any judicial system, important for enhancing the interpretative authority and impact of the Court's case law, as well as the system's authority and credibility. Implementation also underscores the distinctiveness of the above regional Courts, highlighting the dichotomy between the unique hope that they represent for their jurisdiction and the Courts' lack of enforcement authority. These judicial bodies are notable in international order precisely because they have the authority to bind national governments but, at the

same time, they generally lack recourse to power of enforcement of their orders. Consequently, most often, must rely on the cooperation of their Member States, by such moral and other influence as countries are prepared. to exert on non-compliant states.

II. Compliance: - Unlike implementation, Compliance is a status that is attained if and When a State's law and practice are in line with the requirements of the Court's Judgement or decision. Thus compliance is understood as the outcome of implementation: - a State implements a judgement/ decision in order to ensure that it is in Compliance with its obligations under a treaty or the ruling or both. Compliance pertains to the outcome of the measures a State needs to adopt in order to fully implement the decision of the Court. The Vienna Convention on the Law of Treaties (VCLT) defines "Compliance" as implementation of orders in good faith. Compliance is seen as the litmus test for the effectiveness of a judicial body and its remedies, and is also considered one of the means of building institutional legitimacy, credibility and effectiveness.Tracking States' compliance with decisions of the Court is critical for evaluating observance of rule of law within the African, European, Inter-American and ECCJ regional Judicial Systems.

III. Monitoring: - Monitoring implementation of regional Courts' decisions can be viewed as reactive, for example, receiving information on the extent to which the State has implemented any count orders; and it can also be viewed as proactive, for example, going out and seeking information where it is lacking, cross-checking that evidence and validating what has been said; and then also making assessments on whether this is sufficient or not, based on some clear criteria of what is satisfactory implementation. Monitoring therefore is a process by which periodic reviews are done to measure progress made and steps taken to implement decisions of the Court. It is a strategic aspect of ensuring implementation. Firstly, it helps to track the effort made by a state and the steps to perform specific action steps set out in the Court's judgement. Secondly, it ensures specific orders made are not only implemented but are aligned with the specific objective of giving the Litigant the remedy requested from and granted by the court. Thirdly, monitoring helps to ensure that implementation is done within time limits set and hence that the set schedule is observed. Fourthly, monitoring allows for Corrective action, namely to ensure that where decisions are not implemented, steps can be taken to force the state to comply.

IV. Enforcement: - of judgement is to cause the decision of the court to take effect or to compel obedience to it. Enforcement arises where non-compliance has occurred. It entails the use of a series or set of compulsory measures designed to ensure that a State against which a judgement stands, and which has failed or refused to comply with the judgement voluntarily, does so, under sanctions. The object of enforcement is to execute or yield full implementation of the judgement of the court against the wishes of the State Concerned.

1.2. LEGAL OBLIGATION AND MECHANISMS FOR IMPLEMENTATION, COMPLIANCE, MONITORING AND ENFORCEMENT OF JUDGEMENTS: - ECCJ AND OTHER REGIONAL COURTS' LAW AND PRACTICE

The first legal obligation under international Law applicable to all the regional Courts is the Principle of " Good Faith" (Pacta Sunt Servanda) as a rule of international law requires that States must implement their treaty obligations, including the decisions of the Court in full, and in GOOD FAITH, and must not invoke domestic technicalities to Justify non-compliance with international treaty obligations - Articles 26 - 27 of the Vienna Convention on the Law of Treaties.

Under the ECOWAS Community Law, the legal regime relating to implementation, compliance and enforcement of ECCJ's judgements or decisions are consistent with the principle of Good Faith enshrined in the Vienna Convention on the Law of Treaties (VCLT). Article 15(4) of the ECOWAS Revised Treaty of 1993 provides that judgements of the ECCJ are binding on Member States, institutions of the Community, individuals and corporate bodies. The initial protocol on the ECCJ provides under Article 19(2) that the decisions of the Court shall be final and immediately enforceable. That Member States shall take all necessary measures to ensure the execution of the decisions of the Court. Article 24(2) of the Supplementary Protocol on the Court, 2005, gave each Member State the responsibility for the execution of ECCJ's judgements in accordance with its National Rules of Civil Procedure. Although Article 24(3) of the supplementary Protocol on the Court obligates each Member State to appoint a National Authority for the purpose of processing of reception and processing of the execution of the ECCJ's decisions, only Six Member States have so far complied. The above methods of enforcement of ECCJ's judgements is consistent with Article 15 (4) of the Revised Treaty of ECOWAS, 1993, which renders redundant and unnecessary, the following provision of Article 24(1) of the Protocol of the ECCJ as amended: - "Judgements of the Court that have financial implications for nationals of Member States or Member States are binding". More importantly, is the removal of this unnecessary distinction between Judgements with or without financial implications by Article 5 of the ECOWAS Supplementary Act on Sanctions Against Member States that Fail to Honour their obligations, which is to the effect that: -

"The Community Court of Justice shall deliver Judgements which include but not limited to financial sanctions against Member States in application of Article 24, paragraph 1 of the Protocol relating to the Community Court of Justice as amended by Article 6 of Supplementary Protocol A/SP.1/01/05 of 19th January, 2005 when it notices that they have failed to honour their obligations as stated in the Community texts". Article 13 of the ECOWAS Supplementary Act on Sanctions also provides that " the sanctions defined in Articles 5 to 11 of the Supplementary Act should be enforced in increasing order of severity". This adds to the viable options available to the ECCJ in addressing the perennial problem of non-compliance with the court's judgements.

Under the ECOWAS Community Law, the mechanism for enforcement of ECCJ's Judgements lies in the critical role of Member States and their domestic implementation procedure. While the primary responsibility of executing the Judgements of the ECCJ lies with Member States, Article 24 (2) of the Supplementary Protocol, 2005 Amending the Protocol of 1991 on the Court, provides that, "Execution of any decision of the Court shall be is the form of a writ of execution, which shall be submitted by the Chief Registrar of the Court to the relevant Member State for the execution according to the Rules of Civil procedure of that Member State". It also provides that "upon the verification by the appointed authority of the recipient Member State that the writ is from the Court, the writ shall be enforced". Further, that "all Member States shall determine the competent national authority for the purposes of receipt and processing of execution and notify the Court accordingly". It is worth noting that "the writ of execution issued by the Court may be suspended only by a decision of the Community Court of Justice".

Interpreting all the above legal instruments on the role of Member States vis-a-vis their relationship with the ECCJ, the Court reiterated Member States' legal obligation under the Community law and its reliance on the relevant national authorities to enforce the Court's decisions / judgements. That the binding nature of the obligations to enforce the decisions of ECCJ on domestic courts of Member States, does not imply a judicial hierarchical order but an integrated Community legal regime, wherein the ECCJ is neither an appellate court nor a court of cessation over the national courts: - Bakary Sarre and 28 ors v. Republic of Mali and Jerry Ugokwe V. FRN.

Compared with the ECCJ, the legal regime relating to implementation of decisions of the African Human Rights Court (AfCtHR) are mainly the African Charter on Human and Peoples Rights and the Protocol to the African Charter on the Establishment of the African Court on Human and Peoples Rights, 1998, which established the AfctHR, 2006, with the mandate to complement and reinforce the functions of the African Human Rights Commission in terms of its protection mandate. The court was also setup to increase the effectiveness of the African human rights system taking account the non-binding nature of decisions of Commission. Hence Article 1 of The African Charter obligates African Union (AU) Member States to "recognise the rights, duties and freedoms enshrined in the Charter", and to "adopt legislative or other measures to give effect to them". Article 30 of the African Court Protocol obligates the Respondent State to "comply with the judgement…… within the time stipulated by the court and to guarantee its execution". The obligation to comply under Article 30 means that the state must implement the orders in full; in good faith, and not invoke domestic technicalities to justify non-compliance with international obligations.

Like the ECCJ, the African Court does not seem to have any role in the implementation of its decisions. However, it can play a facilitating role in the process. For instance, in accordance with Article 29 (1) of its Protocol, the Court must first transmit the decision to the parties in a suit before the Respondent State is expected to implement it.

Besides, the court may undertake to clarify it's findings. and orders upon request by the Respondent State on the ground that vagueness of such orders are hampering implementation. In certain circumstances, it may be helpful to involve the victims as members of a committee in charge of implementation.

Unlike the ECCJ, the Protocol on the African human rights Court also provides for a mechanism by which implementation is supervised through monitoring by the African Union Executive Council (formerly known as the Council of Ministers). Under Article 29(2) of the African Court Protocol, the Court must notify the AU Executive Council of any judgement for the Council to "monitor execution on behalf of the AU Assembly of Heads of States and Government (AHSG)". Apparently, the Council has been discharging its monitoring mandate mainly based on information provided to it by the Court. The African Court does so in compliance with its obligations under Article 31 of the Protocol to submit an annual non-compliance report to the AHSG at each of the latter's ordinary session. The African Court has been reporting non-compliance to the Council through its annual reports and follow-up letters and statements during various meetings held with AU officials. This practice is captured in the annual activity report of the Court, despite the fact that there is no information published by AU Policy Organs indicating that they have taken any step subsequent to non-compliance reports by the Court. According to the Communique on the 2021 International Conference on the implementation and Impact of Decisions of the African Human Rights Court, in the year 2020 under review, the level of full Compliance with the Court's judgements stood at only 7%. In the 18% of the Applications there was partial compliance with the court's judgements and in 75% of the Applications there was non-compliance with the Court's judgements. Furthermore, there has been 10% compliance with the Court's rulings on provisional measures.

Further, whereas the existing AU legal framework expressly provides for mechanisms for ensuring compliance with binding decisions of the AU, decisions of the African Court are not expressly mentioned as decisions of the AU, which can be enforced through the AU mechanisms. Be that as it may, a purposive interpretation of the AU legal framework admits the conclusion that decisions of the African Court are AU decisions as long as it is accepted that the Court is an Organ of the AU and was empowered by the AU through the Court Protocol to make binding decisions ostensibly on behalf of the AU.

The proposed monitoring approach under the African Court Protocol is that a monitoring process that is meant to be primarily, if not solely, political under the law has been judicial and administrative so far. This is not proper as the choice of the nature of monitoring mechanisms is informed by peculiar demands as experience of the European and Inter-American regional human rights Systems reveal. With the Current monitoring mechanism, even if the AU Council activated its monitoring function, the non-compliance reporting duty of the Court will lead to duplication or a mixed Monitoring process, involving political and judicial / administrative Supervision concomitantly.

At the European Union (EU) level, implementing the Judgements of the European

Court of Human Rights is integral to the role and added value of the Council of Europe. It is a matter that involves all of the Organisation's institutions, including the Parliamentary Assembly. Even though the Committee of Ministers is responsible primarily for monitoring the implementation of the Court's judgements, the Assembly has an important role to play, particularly with regard to national parliaments. It has been following the execution of judgements for over twenty years.

As laid down in Article 46 of the EU Convention on Human lights, each state party is required to implement the judgement of the European Court of Human Rights. The resolution adopted by the Parliamentary Assembly of the Council of Europe on 29 June 2017 calls on states to submit the necessary action plans to the committee of Ministers, to pay also particular attention to cases that have been pending for over 10 years and to strengthen the role of civil society organisations and national human rights institutions in the process of implementing the Court's Judgements. The recommendation adopted on the same day highlights the need to make frequent use of interim resolutions, to work towards greater transparency of Supervising implementation of court's judgements and to give civil society a greater role in the process.

The monitoring of the implementation of ECtHR judgement is on the agenda of the EU Committee of Ministers four times a year. Effectiveness and the political pressure can be increased primarily when the judgements recur on the agenda and are discussed. The overriding principle of the monitoring procedure is constant dialogue and exchange of information, which also follows from the nature of the judgements. The primary task of the enforcement procedure is to support the Member State in question in identifying both, the causes of the violations and possible measures for correcting them. Coercion in the sense of true enforcement cannot be exercised. Member States are called to upon to submit an action plan within 6 months of the judgement and, once the plan has been fully implemented, to submit an action report. After the six months deadline has expired, reminders are generally sent to the responsible parties. If there is no reaction to the reminders, the Committee of Ministers can consider referring the matter back to the ECtHR once again with the question of whether the parties have fulfilled their obligations in carrying out the judgement. After such a hearing, the court can interpret its judgement anew, and require additional measures. Only when the Committee of Ministers is convinced that the judgement has been fully implemented will the monitoring procedure be concluded with a final resolution, which requires a two-thirds majority.

In contrast to the African and European systems, there is no independent monitoring organ; the Inter-American Court of Human (IACHR) monitors the implementation of its judgements itself. It has been dogged by repeated Complaints of insufficient implementation. However, the figures for concluded cases by themselves say little about implementation. An IACHR judgement that is 60% implemented can be much more far reaching than a fully implemented proceeding in the European or African System. It makes more sense to measure non-implementation on quality rather than quantity. Responsibility for the implementation of Judgements lies first and foremost with the

respondent State itself. The State within a time frame is required to submit a report to the court about its case-related activities aimed at implementing the judgement. If the report indicates implementation deficits, the Court may issue further requirements for the State and organize hearings at as its seat or in the State concerned. A division of the Court, created since 2015 for monitoring judgement implementation, accompanies each case individually until it has been fully implemented; it also assists in procedures involving other comparable cases affecting same state. The division ultimately decides when a judgement has been completely implemented. The public is regularly informed of events. Hence monitoring is based on detailed check-ups through ongoing dialogue. From the court's standpoint, this increases control over the process, enabling it to react more quickly and effectively to difficulties, and to advance proceedings.

2.0 DECISIONS / JUDGEMENTS OF ECCJ AND OTHER INTERNATIONAL/REGIONAL COURTS IN AFRICA, EUROPE AND THE AMERICA ARE SUPRANATIONAL JUDGEMENTS, NOT FOREIGN JUDGEMENTS

A Judgement of the ECCJ like those of African Human Rights Court, the European and inter-American courts of Human Right must be distinguished from a foreign Judgement; in fact it is not a foreign Judgement. When the Court, whose decisions are in nature binding, renders it's judgement, the State involved has to implement the judgement and cannot invoke its domestic legal processes for its failure to comply with a Treaty obligations. The state cannot subject the judgement for review before its domestic Courts as may be the case with foreign judgements or refuse to recognise them. By merely being bound by the provisions of the Protocol that sets up the Court, the state is also bound by the decisions of the Court, as the institution mandated to interpret that Protocol.

The basis for this argument is first, foreign judgements are judgements rendered in one Jurisdiction for which recognition and enforcement is sought in another Jurisdiction. Foreign judgements may be recognized unilaterally by a state based on its own national law provisions, or through bilateral or multilateral understandings, which expressly provide for the recognition of such judgements. Usually recognition of foreign judgements take place when the court of one State take steps to enforce the foreign judgement of the other state through proceedings recognised under the enforcing State's domestic law without substantially departing from the terms of the original judgement and without rehearing of the original lawsuit.

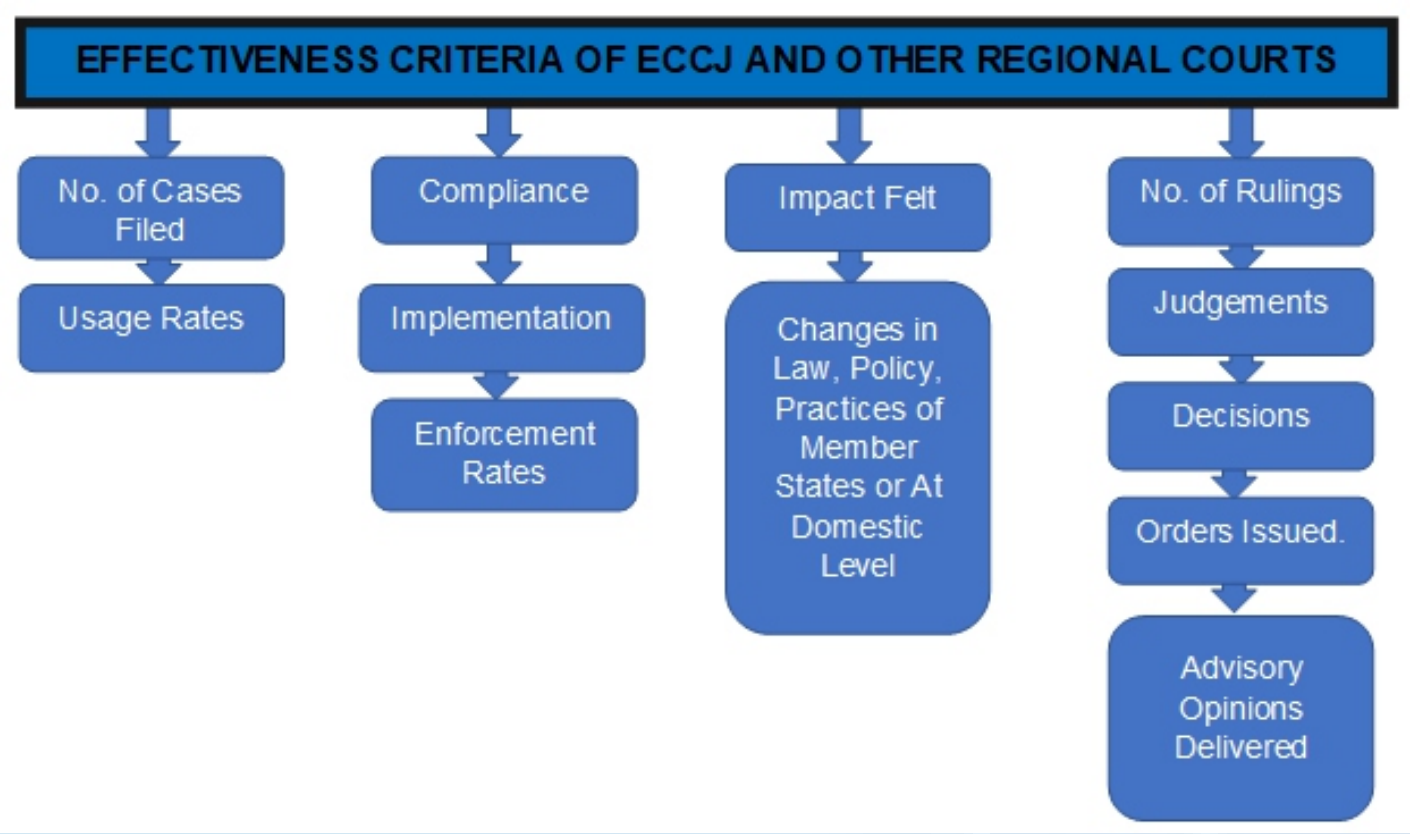
Second, it is worth noting that the procedures and requirements for enforcement of foreign judgements are largely guided by the principle of reciprocity, that do not apply to the judgements of ECCJ because such judgements are Supranational Judgements, resulting from the fact that ECOWAS is a Supranational authority and the ECCJ is also a Supranational Court. Hence like the ECOWAS Regulations, so are the judgements of the ECCJ directly applicable in Member States consistent with the ECOWAS Community legal order and trend of case law. It would be fallacious to equate such judgements with judgements of national courts of foreign states as such. It is apparent that national

requirement of a specific legislative instrument to give effect to the agreement between a Member State and that seeking Country in execution of foreign judgements need not apply to the ECCJ due to its supranationality. However, domestication of the Court's Protocol by all member states is a necessary step to forge a harmonious relationship between ECCJ and member States, especially their national courts.

3.0 EFFECTIVENESS CRITERIA OF THE ECCJ'S JUDGEMENTS/DECISIONS

The question here is, what are the effectiveness criteria to measure the success or performance of an international court like the ECCJ?

FIGURE 1:- EFFECTIVENESS CRITERIA OF ECCJ AND OTHER REGIONAL COURTS



Is it about the number of cases filed, rulings, orders and judgements delivered or about compliance/ implementation / enforcement and usage rates, or about impacting member state and society with its decisions? Experts have warned against the tendency "to equate international Court impact with compliance with Judgements usage rates or impact on State conduct". That a low aiming court, issuing minimalist remedies, may generate high level of compliance but have little impact on the State of the world. That using compliance as the only metric to measure the impact of international Courts, minimizes the other goals served by human rights litigation, such as incorporating the court into a "broader strategy of political mobilization", or changed policies and practices in domestic Spheres, or deploying leverage to mount political pressure on governmental actors to comply with the

decisions of these courts. Hence "the real effectiveness test is not compliance alone, being just only one element or means of appreciating the domestic impact of international courts.

So far, only six of the fifteen member states namely Burkina Faso, Guinea, Ghana, Mali, Nigeria and Togo have appointed the required national authority for the enforcement of the ECCJ judgement, indicating a lack of preparedness to comply with the ECCJ's decisions. It must be noted, however, that some States that have failed to designate a national authority, such as Niger, have still complied with some of the court's decisions. It is common knowledge that as of 2021, the rate of compliance with the judgements of the ECCJ "is embarrassingly low", at 30% unsatisfactory rate of compliance. Lower than that of 2018 data, wherein 13 out of 15 Member States complied in varying degrees with some judgements of the court. That only 35 out of 64 enforceable decisions delivered against ECOWAS Member States and institutions have been complied with since 2005. Representing about 55% compliance rate across West Africa, although not excellent, but indicates as of 2018, there had been more compliance than non-compliance with ECCJ's judgements.

The most well-known instance of compliance is the relatively speedy and full compliance of the Government of Niger Republic with the ECCJ's decisions in the famous case of Hadijatou Mani Koraou v. Republic of Niger on the prohibition of modern slavery and the payment of ten million CFA francs as compensation to the victim by the government of Niger for the harm suffered. More recently, the Government of Gambia paid half of the sum that the ECCJ awarded to two journalists who were unjustly detained and later killed by the former ruling military regime; though the amount came belatedly, a year and two months after the new government came into office. All the four Gambian Journalists won monetary compensation awards from the ECCJ in 2018, but were not paid until May 2019, when 25,000 dollars were eventually paid to each by the Gambian government. The Government of Sierra Leone also paid 150,000 dollars of out of 250,000 USD awarded by the ECCJ to a wrongfully dismissed police officer, El-Tayyib Bah.

The above captures the reality that poorer Member States may find it difficult to comply with Court orders to pay out large monetary sums to those who have Successfully litigated against them, and such compliance has a profound impact within the country. Similar notable compliance evidence by the government of Sierra Leone, in the right to education of pregnant girls; by Burkina Faso in the political opposition banned to participate CDP case; by Nigeria in the Jerry Ugokwu case; where the government complied with the ECCJ's interim order not to seat a person who had been declared the winner of an election to Nigeria's federal legislature; and by Nigerian Government in the Alimu Akeem case, where a Nigerian soldier who had been detained without trial for two years was released from detention.

Table 1 below reveals Judicial Statistics of the ECCJ from 2003 to 24th March 2023, with a total of 641 cases filed, 135 rulings and 347 Judgements delivered, and 26 decisions on revision, 52 orders as well as 6 advisory opinions issued by the ECCJ out of

its 1,312 sessions, leaving only 174 cases pending. Obviously, there was an increase in the number of cases filed from 55 for the year 2020, to 72 and 62 in 2021 and 2022 respectively. Judgements delivered also rose from 30 in 2020, to 41 each in 2021 and 2022. While year 2017 witnessed an the highest number of orders issued at total of 15, subsequent years witnessed a decrease to an average of 3 per year: - 2018 to 2022. While the first quarter of the year 2023 alone witnessed a sharp increase to 5 orders issued by the court.

Table 1: -JUDICIAL STATISTICS OF THE COMMUNITY COURT OF JUSTICE, ECOWAS FROM 2003 TO DATE (24TH MARCH, 2023)

STATISTICS & YEAR	CASES FILED	RULINGS DELIVERED	JUDGMENTS DELIVERED	COURT SESSIONS	APPLICATION FOR REVISION/SUPP	DECISIONS ON REVISION	ORDERS	ADVISORY OPINIONS	PENDING CASES
2003	1	-	-	-	-	-		-	1
2004	1	-	1	5	-	-	1	-	1
2005	6	-	4	26	-	-	2	1	2
2006	21	1	3	31	-	-		-	21
2007	12	4	5	41	-	-		-	27
2008	12	3	5	26	1 JUDGMENT	-		1	29
2009	14	12	4	34	1 JUDGMENT	1		-	20
2010	17	11	8	71	1 JUDGMENT	1		-	23
2011	30	11	9	74	5 JUD, 1 RUL	1		-	40
2012	25	19	18	105	1 JUDGMENT	4	2	-	39
2013	27	15	11	71	1 JUDGMENT	3	1	1	41
2014	31	6	18	48	4 JUDGMENTS	2	-	-	52
2015	39	10	28	105	2 JUDGMENTS	3	4	1	59
2016	45	8	29	105	2 JUDGMENTS	3	6	1	63
2017	47	4	19	79	-	-	15	-	89
2018	61	2	31	85	2 JUDGMENTS	-	4	-	108
2019	52	10	38	96	3 JUDGMENTS	-	3	-	119
2020	55	7	30	101	12 JUDGMENTS	1	4	-	140
2021	72	7	41	127	4 JUDGMENTS	6	3	1	167
2022	62	3	41	79	3 JUDGMENTS	1	2	-	180
2023	11	2	6	4	-	1	5	-	174
TOTAL	641	135	347	1312	39	26	52	6	174

From table 1 above, Judicial statistics shows that the admirable performance of the Court, in delivering 30 judgements in 2020 slightly lower than 31 delivered in 2018 and 38 in 2019, despite the COVID-19 pandemic, is attributable to the implementation of the virtual session initiated by the Court under the Leadership of President Honourable Justice Edward Amoako Asante. The attendant advantages are in the areas of cost and energy savings for both lawyers and litigants who would otherwise have wasted several hours travelling to the seat of the Court for the Sessions held.

The above judicial statistics sounds very impressive in terms of performance or Success rate, but the ECCJ's effectiveness should not be measured solely by the number of judgements, rulings and orders delivered. As such an approach comes with the risks of an unsustainable caseload and may dwarf other key elements of effectiveness, such as its impact on changed behaviour at the domestic level. In fact, poor or non-compliance rate does not automatically translate to failure or lack of effectiveness of the Court. As recent finding rightly observed, international courts' rulings with high compliance rates may be entirely ineffective, whereas those with low compliance rates may be quite effective, if they engender Some modification of State behaviour, as demonstrated in the following cases involving Nigeria: - the ECOWAS Court's rulings: - in the SERAP Environmental Rights case contributed significantly to the government's increased attention to ending and cleaning up of oil pollution in the Niger Delta region; in SERAP Basic Education case, has had significant impact on Nigeria's National Human Rights Commission, by Shaping the content of its Draft National Human Rights Action Plan it finally produced.

4.0. ADDRESSING THE CHALLENGES OF ENFORCEMENT/COMPLIANCE WITH ECCJ'S JUDGEMENTS

The challenges of judgement enforcement or compliance have been aptly summarized as: - failure to appoint competent national authorities by nine Member States for receiving, verifying and processing the Writ of Execution for the ECCJ and for rendering returns to the Courts; lack of domestic legislation for the enforcement of the ECCJ judgements by national courts; failure to demonsticate the Revised Treaty of ECOWAS, 1993 and the Protocol on the Court by Member States, to avoid the negative impact of non-domestication recently highlighted by the decision of the Accra-based High Court of Ghana in Chude Mba v. Republic of Ghana; non-involvement of ECOWAS political authorities in the implementation monitoring of the ECCJ's judgements as has been practised at to the African Union and European Union levels; and ECCJ plays no role in the enforcement of its judgements as is the practice with the Inter-American Court of Human Rights earlier observed. These challenges necessarily constitute a huge handicap in the optimal performance of the ECCJ, and they apparently seek to undermine the credibility in the effectiveness and added value of the ECCJ to the African human rights system through its growing unique human rights jurisprudence in west Africa.

Addressing the above challenges the following suggestions are made: -

- Member States to ensure immediate and effective implementation of decisions

rendered by the ECCJ to ensure compliance with their treaty obligations under the Community Legal order, earlier outlined;

- Member States need to develop initiatives to increase their capacity to effectively execute ECCJ's decisions, including cooperation with other ECOWAS Governance Architecture platform members to offer technical assistance where necessary;
- Relevant stakeholders, including the academia, need to adopt a holistic approach to assessing compliance with the ECCJ's decisions, taking into account the different changes in the overall governance framework in the Member States concerned;

- The ECCJ need to draw up an action plan with timelines and deliverable outputs in Liaising with the ECOWAS Commission and Parliament for engagement with national authorities on the implementation of its judgements, decisions and orders; it is imperative for the ECCJ to clearly determine its role in deciding the specificity of its judgements and the extent to which it will interact with other actors to ensure implementation of its decisions;
- ECCJ needs to develop a more effective mechanism of tracking and monitoring implementation of its decisions, including continuing dialogue with the Member States' Attorneys General and Chief Judges, which could help in hastening implementation of its judgements as Supranational decisions, not foreign judgements;
- National Bar Associations, Law faculties/schools and national legal research institutes need to mobilise resources to promote continuing legal education and Judicial education On the ECOWAS Community law and practice as well as the Jurisprudence of the Court;
- ECCJ to encourage national human rights institutions and other national legal research institutes to make relevant submissions as amicus curiae; to help follow up on the implementation of the Court's decisions; to disseminate information about the Court's Jurisprudence; and to ensure harmonization between national human rights strategies and the work of the Court;
- Finally, in collaboration with relevant stakeholders, ECCJ may wish to develop an implementation guidelines of ECCJ judgements for national judiciaries and bar associations for possible consideration in addressing some of the challenges of general implementation of ECCJ's decisions at domestic level.

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NIALS TO RECEIVE NATIONAL PRODUCTIVITY ORDER OF MERIT AWARD FOR THE FIRST TIME IN 43 YEARS

In a historic achievement, the Nigerian Institute of Advanced Legal Studies (NIALS) is to be conferred with the prestigious National Productivity Order of Merit Award (NPOM) in the institutional category. This momentous recognition comes as a tribute to the exemplary leadership of Professor M.T. Ladan, who serves as the Director-General of NIALS from 2019 to date.

The award acknowledges NIALS' outstanding contributions to intellectual productivity, impactful capacity building for justice sector personnel and institutions, as well as innovative research in emerging fields of law and policy. NIALS proudly submitted forty eight (48) recent entries, showcasing their remarkable achievements over the past three years. The submissions covered the periods of 2019/2020, 2020/2021, and 2021/2022, highlighting their significant contributions to the legal and policy landscape.

This remarkable feat marks the first national award won by NIALS in its forty three (43) years of existence. It stands as a testament to the Institute's dedication, commitment, and unwavering pursuit of excellence in legal education, research, and development. NIALS continues to play a pivotal role in shaping the future of law and policy, driving positive change, and fostering productivity within the justice sector.

The NPOM award serves as a resounding affirmation of NIALS' vision and its relentless efforts in advancing legal education and research. It further solidifies their status as a premier institution of legal excellence, empowering individuals and institutions through knowledge, capacity building, and cutting-edge research.

NIALS and Professor M.T. Ladan are commended for their remarkable achievements and for bringing immense pride to the Institute and the legal community at large. This well-deserved recognition cements their position as trailblazers in the legal domain and inspires others to strive for excellence in their respective fields.

Congratulations NIALS!!!

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Tuesday, May 30, 2023
Lagos, Nigeria.

ILA PRESIDENT CONGRATULATES THE DIRECTOR GENERAL OF THE NIGERIAN INSTITUTE OF ADVANCED LEGAL STUDIES ON NATIONAL PRODUCTIVITY ORDER OF MERIT (NPOM) AWARD

On May 30, 2023, an institutional member of the ILA, The Nigerian Institute of Advanced Legal Studies, received the prestigious National Productivity Order of Merit Award for the first time in its 43 years history.

The President of the Nigerian Branch of the ILA, Professor Damilola Olawuyi, SAN, has consequently sent a note of congratulations to the Director General of NIALS, Professor Mohammed Tawfiq Ladan, Ph.D. for his distinguished record of innovative leadership, which has led to this milestone accomplishment and well-deserved recognition by the Government and people of Nigeria.

The Federal Government of Nigeria instituted the National Productivity Order of Merit Award to recognize and honour productive individuals and organizations in Nigeria for outstanding achievements in the preceding years.

Congratulations to NIALS, and wishing the DG many more accomplishments.

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