



The Legal Implications of Land Grabbing and Forced Evictions in Nigeria

Anugbum Onuoha Ph.D*

Abstract

In Nigeria, land grabbing and forced evictions have become urgent problems with significant adverse social, economic, and human rights impacts on affected people. This article examines the pressing issues of forced evictions and land grabbing in Nigeria, which have significant social, economic, and human rights repercussions for affected populations. The country's rapid urbanisation, population growth, and infrastructure development projects have sparked land ownership and access conflicts. Marginalised groups, indigenous communities, and vulnerable populations have suffered disproportionately as a result of arbitrary land seizures and evictions made possible by colonial-era land policies and inadequate legal frameworks. This article uses doctrinal methodology to examine Nigeria's legal framework governing land rights, tenure systems, and eviction processes. Through a comprehensive analysis of domestic and international legal instruments, it underscores the intricate web of legal norms shaping land governance and conflicts. Findings revealed the urgent need for legislative reforms and policy interventions to safeguard affected individuals' rights and ensure offenders' accountability. It recommended legislative reforms to strengthen legal protections for land rights and tenure security while establishing robust mechanisms for holding perpetrators of land grabbing and forced evictions accountable. In conclusion, this article sheds light on the intricate legal implications of land grabbing and forced evictions in Nigeria, revealing their profound social, economic, and human rights implications.

Introduction

Land grabbing and forced evictions in Nigeria represent multifaceted challenges with profound implications for social, economic, legal, and human rights. The scope of the issue extends across urban and rural areas, affecting diverse communities, including indigenous peoples, smallholder farmers, urban dwellers, and marginalised groups. Land grabbing involves unlawful or coercive acquisition of land, often through fraudulent means, for commercial, industrial, or speculative purposes¹. On the other hand, forced evictions entail the removal of individuals or

*Anugbum Onuoha, PhD, Associate Professor of Property Law and Secured Credits, Head of Department of Private and Property Law, Rivers State University, Port Harcourt, Nigeria.

¹Taiwo Ajala, 'Examining the Legal Safeguards Against the Environmental Impact of Land Grabbing in African Countries: A Critical Review of Nigerian Environmental Law' *Environmental Law Review* (2018) (20)(1) 3-15.



communities from their homes or lands without their consent or adequate compensation, typically to make way for development projects or resource-extraction activities.² Land grabbing and forced evictions have become pervasive issues in Nigeria, with significant socio-economic, legal, and human rights implications for affected communities. A combination of indigenous land tenure systems, colonial-era land policies, and post-independence land reforms has shaped the complex historical context of land ownership and rights in Nigeria. Nigeria's customary land tenure systems, which varied across ethnic groups and regions, were primarily responsible for governing the country's land before colonial rule. These systems recognised the communal ownership of land and prescribed traditional rules and norms for land use, allocation, and inheritance.

During the colonial era, the land tenure system in Nigeria was meticulously structured to serve the interests of British imperialists. The land policies orchestrated by colonial powers were devised to disrupt traditional land tenure systems and facilitate the acquisition of land for various purposes including colonial governance, commercial cultivation, and infrastructure development. Due to the communal nature of land ownership in pre-colonial Nigeria, the colonial authorities enacted legislation³ and regulations pertaining to land use, development, and land ownership, among other things, in order to facilitate commerce and governance through the acquisition and transfer of land titles⁴. To give the colonial governor the authority to purchase property when it is needed for public use, the Public Lands Acquisition Act⁵ was enacted in 1917. This statute covered the Nigerian protectorate and colony at the time. It authorised the colonial government to acquire land without permission, whether occupied or not, and stipulated that no compensation would be given for possessing unoccupied land⁶. After gaining independence in 1960, Nigerian governments

² O Ajayi and P. Soyinka-Airewele, 'Forced Eviction and Rights-Based Approach to Development in Nigeria: A Case of Makoko Community in Lagos State' *African Population Studies*, (2020) (34) (2): 5197-5207.

³ Treaty of cession (1861), Land Proclamation Ordinance (1900), Land and Native Rights Act (1916), Niger Lands Transfer Act (1916), Public Lands Acquisition Act (1917), Native Lands Acquisition Act (1917), State Lands Act (1918) and Town and Country planning Act (1947).

⁴ Namso Udoekanem, David Adoga, and Victor Onwumere, 'Land Ownership in Nigeria: Historical Development, Current Issues and Future Expectations' *Journal of Environment and Earth Science* (2014) (4)(21) 182-189.

⁵ (Cap 167) 1917.

⁶ [Godfrey Uduehi](#), *Public Lands Acquisition and Compensation Practice in Nigeria* (J. West Publications, 1987) 11-18.



implemented various land laws and regulations to improve land tenure systems, encourage land development, and rectify past injustices. However, the implementation and enforcement of these laws have been tainted by corruption, inefficiency, and a dearth of political determination, resulting in ongoing instances of land grabbing and forced evictions in different parts of the country.⁷

In recent decades, Nigeria has experienced rapid urbanisation, population growth, and increasing demand for land for agriculture, industry, and infrastructure development. This has intensified competition for land, particularly in urban areas and resource-rich regions, leading to conflicts over land ownership, access, and control. Land grabbing by powerful individuals, corporations, and government agencies has become commonplace, often resulting in the displacement of indigenous communities, loss of livelihoods, and violations of human rights⁸. Forced evictions, both in urban and rural areas, are frequently carried out without adequate notice, consultation, or compensation for affected communities. Residents are often forcibly removed from their homes and lands to make way for urban renewal projects, commercial developments, or government infrastructure projects, such as roads, dams, and oil pipelines. These evictions are often characterised by violence, intimidation, and violations of due process and human rights, leaving communities vulnerable and marginalised.⁹

This article aims to provide an in-depth examination of the issue of land grabbing and forced evictions in Nigeria, as well as provide legal and policy recommendations for dealing with this vital issue. The article utilises a multidisciplinary approach to achieve these aims, relying on legal, socio-economic, and human rights perspectives. Understanding the historical context and

⁷Olusola Oladapo Makinde, and Olubukunmi Temitope Makinde, 'Public Land Acquisition and Administration in Nigeria: Issues, Strategies and Policies' *Journal of Multidisciplinary Engineering Science*, (2019)6(11):1038-1039.

⁸Henry Uche Obuene, Olayinka Akanle, and Ayokunle Olumuyiwa Omobowale, 'Land Grabbing and Resistance of Indigenous Landowners in Ibadan, Nigeria' *International Sociology* (2022) (47)(1):143-159.

⁹ Ibid.



contemporary dynamics of Nigeria's land grabbing and forced evictions allows stakeholders to collaborate on solutions that promote social justice, human rights, and sustainable development.

Overview of Traditional Land Tenure Systems in Nigeria

In pre-colonial Nigeria, land ownership and rights were primarily governed by indigenous land tenure systems, which varied significantly across regions and ethnic groups. These systems were deeply rooted in customary practices and cultural norms, reflecting different communities' diverse socio-economic and environmental conditions. Generally, land ownership in traditional Nigerian societies was communal rather than individual. Land was considered a communal asset, with rights vested in families, clans, or communities rather than individual landowners. These communities typically had well-established land allocation, management, and dispute resolution systems, often overseen by traditional authorities such as chiefs, elders, or village councils. Land use was guided by customary laws and practices that regulated land inheritance, cultivation, and access.¹⁰ Nigeria's traditional land tenure systems were characterised by a close relationship between people and the land, with cultural and spiritual significance attached to particular territories. Land was not merely seen as a commodity for economic exploitation but as an integral part of the community's identity, heritage, and livelihood. The arrival of colonial powers in Nigeria profoundly disrupted traditional land tenure systems and practices. Colonial authorities introduced land policies aimed at asserting control over land resources and facilitating economic exploitation for the benefit of the colonial administration and settlers.¹¹

Under colonial rule, land was often confiscated from indigenous communities through coercive means such as force, fraud, or deception. Colonial powers sought to acquire land for various purposes, including establishing plantations for cash crops, mining activities, infrastructure projects such as railways and roads, and creating reserves for settler communities. The Land Acquisition Act¹² was a significant legislative instrument that formalised

¹⁰ Felix Kayode Omole and Olumuyiwa Bayo Akinbamijo, 'Land Development and Planning Laws in Nigeria: The Historical Account' *Journal of Law and Policy and Globalization* (2012) 8: 25-31.

¹¹ Namnso Udoekanem, (n 4).

¹² Cap 167.



the process of land expropriation by granting colonial authorities' broad powers to compulsorily acquire land for public purposes. This law enabled the colonial government to seize land from indigenous communities with minimal compensation or regard for customary land rights. The impact of colonial land policies on Nigerian communities was profound and far-reaching. Many indigenous peoples were dispossessed of their ancestral lands, leading to loss of livelihoods, cultural dislocation, and social upheaval.¹³ The legacy of colonial land policies continues to shape land governance and land-related conflicts in contemporary Nigeria.

Following Nigeria's independence in 1960, successive governments enacted various land laws and regulations to address historical injustices, promote development, and regulate land use and ownership. One of the most significant pieces of legislation was the Land Use Act of 1978¹⁴, which centralised control of land in the hands of the government. This law vested all land within the territory of each state in the Nigerian Federation in the state governor, who held such land in trust for the people. The Act fundamentally altered traditional land tenure systems by replacing customary land rights with statutory land rights, effectively converting communal land into state-owned land. In addition to the Land Use Act, other laws and regulations, such as the Urban and Regional Planning Act, were introduced to regulate land use and development, particularly in urban areas¹⁵. These laws aimed to promote orderly urban development, prevent arbitrary land grabbing, and ensure sustainable land management practices.

Conceptual Clarification

Land grabbing and forced evictions are closely connected issues that have far-reaching consequences for land rights, human rights, and social justice. It is essential to understand these concepts' frameworks and definitions clearly.

Land Grabbing

¹³ O. A. Dosumu, 'Land Tenure System in Nigeria and its Effects on Land Administration' *The Map Maker* (1977) 4(1): 23-25.

¹⁴ Chapter L5 Laws of the Federation of Nigeria 2004

¹⁵ T. O. Elias, *Nigerian Land Law* (Sweet and Maxwell, London 1971) 1-24.



Land grabbing refers to the unlawful or coercive acquisition of land, often involving the displacement of communities and the exploitation of natural resources for commercial, industrial, or speculative purposes.¹⁶

Forms of Land Grabbing in Nigeria

Land grabbing manifests in various forms, each with distinct characteristics and implications for affected communities and the environment. These forms include:

- (a) **Large-Scale Land Acquisitions:** These involve the acquisition of vast tracts of land by governments, corporations, or foreign investors for agricultural, industrial, or infrastructure development projects. Often facilitated by government policies or incentives, these acquisitions may result in the displacement of local communities, loss of livelihoods, and environmental degradation. Such projects may include agribusiness plantations, mining operations, and mega-infrastructure projects.¹⁷
- (b) **Urban Renewal and Development Projects:** This pertains to infrastructure projects, residential complexes, and commercial centers and frequently takes the form of urban renewal and development initiatives initiated by private developers or governmental bodies. As a result, forced evictions and demolitions are prevalent in these projects, frequently resulting in the displacement of residents to make way for new construction without sufficient compensation or alternative housing alternatives¹⁸.

¹⁶Stein Howard, and Samantha Cunningham, 'Formalization And Land Grabbing In Africa: Facilitation Or Protection?' *Tanzania Journal of Development Studies* (2017)(15)(1-2):1-31.

¹⁷Anna Jurkevics, 'Land Grabbing and The Perplexities of Territorial Sovereignty' *Political Theory* (2022) (50) (1): 32-58.

¹⁸David Adams, and E. M. Hastings, "Urban Renewal in Hong Kong: Transition from Development Corporation to Renewal Authority" *Land Use Policy* (2001) (18)(3) 245-258.



- (c) **Land Speculation and Land Banking:** The acquisition of land for speculative purposes, to resell it at a higher price in the future, constitutes land speculation and land banking. In swiftly urbanising regions where land values are anticipated to appreciate, speculative land seizures frequently result in land hoarding, inflated land prices, and land disputes. However, land banking pertains to the procurement of land by governmental bodies or investors with the intention of developing it in the future or for strategic objectives, frequently resulting in the underutilisation and inactivity of the land.¹⁹
- (d) **Unlawful Land Conversions and Encroachments:** this occurs when land is unlawfully appropriated for unauthorised purposes, such as agricultural expansion, urban sprawl, or infrastructure development. Encroachments on public lands, forests, and water bodies also contribute to land grabbing, leading to environmental degradation, loss of biodiversity, and depletion of natural resources. These activities often occur in collusion with corrupt officials or through informal arrangements, bypassing legal procedures and regulations²⁰.
- (e) **Grabbing of Community Lands:** Indigenous communities and rural populations are at high risk of land grabbing due to their lands being targeted for commercial exploitation or resource extraction, often leading to the loss of ancestral lands and livelihoods and lack of legal recognition of their land rights.²¹

The various forms of land grabbing present significant challenges to sustainable development, social justice, and environmental conservation. This underscores the importance of implementing more robust land governance mechanisms, safeguarding community land rights, and adopting inclusive land management policies.

¹⁹Saturnino M Borrás Jr, Ruth Hall, Ian Scoones, Ben White, and Wendy Wolford, 'Towards A Better Understanding of Global Land Grabbing: An Editorial Introduction' *The Journal of Peasant Studies* (2011) (38)(2) 209-216.

²⁰Liz Alden Wily, "The Law And Land Grabbing: Friend or Foe?." *Law and Development Review* 7, no. 2 (2014): 207-242

²¹Bin Yang, and Jun He. "Global Land Grabbing: A Critical Review of Case Studies Across the World." *Land* (2021)(10)(3) 1-9.



Impacts of Land Grabbing

Land grabbing in Nigeria has wide-ranging impacts that affect society, the economy, the environment, and human rights. Outlined are some of the main effects:

- (a) **Displacement and Loss of Livelihoods:** Land grabbing causes forced displacement of communities and individuals, causing increased poverty and food insecurity. This exacerbates social inequalities and perpetuates cycles of poverty among affected communities.²²
- (b) **Environmental Degradation:** The Act of grabbing land contributes to the destruction of forests, degradation of land quality, depletion of biodiversity, and contamination of water sources. These actions have long-lasting and detrimental effects on the environment. The degradation of the environment poses a significant threat to the long-term viability of ecosystems, jeopardising the diversity of species and exacerbating climate change and other environmental challenges.²³
- (c) **Food Insecurity and Agricultural Disruption:** Large-scale land acquisitions for commercial agriculture often prioritise export-oriented crops or biofuel production over food crops for local consumption. This can lead to food insecurity and reduced access to nutritious food for local communities. Additionally, the displacement of smallholder farmers and disruption of traditional farming practices further exacerbate food insecurity and undermine agricultural sustainability.²⁴
- (d) **Social Conflict and Displacement:** Land grabbing often leads to disputes between investors, governments, and local communities regarding land rights, resource access, and compensation for acquiring land. Disagreements regarding land ownership and control frequently lead to heightened social tensions, violence, and displacement, which in turn erode community unity and exacerbate existing conflicts. Land-related conflicts and

²²Noah Echa Attah, 'Possession by Dispossession: Interrogating the New Wave of Land Grabbing in Nigeria' *Journal Of Land And Rural Studies* 1, no. 2 (2013): 213-228.

²³ Ibid.

²⁴Noah Echa Attah, (n 24)..



displacement disproportionately affect indigenous peoples, rural communities, and marginalised groups.²⁵

Forced Evictions

Forced evictions involve the removal of individuals or communities from their homes or lands against their will, typically without adequate notice, consultation, or compensation, and often in violation of their human rights. Forced evictions are often carried out by governments, private companies, or landlords to make way for development projects, urban renewal initiatives, or infrastructure expansion²⁶. Forced evictions involve using force or intimidation to force individuals or communities to leave their homes or lands without providing alternative options. These evictions often violate fundamental rights such as housing, property ownership, livelihood, and freedom from discrimination. They disproportionately affect marginalised groups like informal settlers, urban slum dwellers, indigenous peoples, and rural communities, who often struggle to obtain legal protection and seek recourse for their situation. Proper procedures and safeguards are crucial in preventing such evictions.²⁷

Factors Contributing to Forced Evictions in Nigeria

Forced evictions in Nigeria stem from complex factors driven by social, economic, political, and legal dynamics. Some of the factors contributing to forced evictions in the country include:

²⁵Simon Batterbury, and Frankline Ndi, 'Land-Grabbing in Africa' in J Binns, K. Lynch and E. Nel (eds.) *The Routledge Handbook of African Development* (Routledge, London 2018)573-582.

²⁶Paul Ocheje, 'In The Public Interest': Forced Evictions, Land Rights And Human Development In Africa' *Journal of African Law* (2007) (51)(2) : 173-214.

²⁷ Ibid.



1. **Urbanisation and Population Growth:** Nigeria's rapid urbanisation and population growth have pressured urban land and housing, increasing informal settlements and slums. Government authorities often resort to forced evictions to address urban blight or clear land for redevelopment projects, disregarding the rights and needs of affected residents.²⁸
2. **Land Speculation and Real Estate Development:** Land speculation and real estate development drive forced evictions in urban and peri-urban areas of Nigeria. Speculators, developers, and investors often target informal settlements and low-income neighbourhoods for redevelopment or gentrification, seeking to maximise profits from land appreciation or commercial ventures. Government collusion with private interests and corruption in land transactions exacerbate the vulnerability of communities to forced evictions, as powerful actors exploit loopholes in land laws and regulatory frameworks for their benefit.²⁹
3. **Infrastructural Development Projects:** Large-scale infrastructure projects, such as road construction, urban renewal, and public utility expansion, frequently result in forced evictions in Nigeria. Government agencies often prioritise infrastructural development over human rights considerations, displacing communities without adequate compensation or resettlement plans.³⁰
4. **Land Disputes and Insecure Tenure:** Nigeria's land disputes and insecure tenure systems lead to forced evictions in rural and peri-urban areas. These conflicts escalate into violence, coercion, and displacement. Weak institutions, lack of adequate legal recognition for customary land rights, and overlapping claims to land vulnerability as powerful interests exploit land-related conflicts.³¹

²⁸ Rebecca Enobong Roberts, and Ogochukwu Okanya, 'Measuring The Socio-Economic Impact Of Forced Evictions And Illegal Demolition; A Comparative Study Between Displaced And Existing Informal Settlements' *The Social Science Journal* (2022)(59)(1): 119-138.

²⁹ Grant, Evadné, and Onita Das, 'Land Grabbing, Sustainable Development and Human Rights' *Transnational Environmental Law* (2015) (4)(2):289-317.

³⁰ Victor Onyebueke, Julian Walker, Barbara Lipietz, Oliver Ujah, Victoria Ibezim-Ohaeri, 'Urbanisation-Induced Displacements in Peri-Urban Areas: Clashes Between Customary Tenure and Statutory Practices in Ugbo-Okonkwo Community In Enugu, Nigeria' *Land Use Policy* (2020) (99) (104884) 1-14.

³¹ Ibid.



5. Government policies and legal frameworks in Nigeria often fail to protect vulnerable populations' rights against forced evictions adequately. For example, the Land Use Act of 1978 vests land ownership in state governments, granting them broad powers to acquire land for public purposes compulsorily. While intended to promote equitable access to land, the Act has been used to justify forced evictions without due process or adequate compensation for affected communities and individuals. Similarly, urban planning laws and regulations often prioritise top-down approaches to development, marginalising the participation of affected residents and disregarding their housing rights.³²

3.5 Instances of Forced Evictions in Nigeria

Numerous case studies in Nigeria vividly illustrate the prevalence and profound impacts of land grabbing on affected communities, shedding light on the multifaceted challenges and human rights violations associated with this phenomenon. Some notable examples include:

- i. **Otodo Gbame Community, Lagos State:** The forced eviction of the Otodo Gbame waterfront community in Lagos State exemplifies the devastating impacts of land grabbing on urban poor communities. In 2016, state authorities demolished the informal settlement, displacing thousands of residents and destroying their homes and livelihoods. The eviction was done without adequate notice, consultation, or resettlement plans, violating the residents' right to adequate housing and livelihoods. The Otodo Gbame case sparked widespread condemnation from human rights groups and highlighted the urgent need for legal protections for informal settlers in urban areas.³³
- ii. **Makoko Waterfront Community, Lagos State:** The ongoing struggle of the Makoko waterfront community against forced evictions and land grabbing underscores the

³²Ajayi, Olumuyiwa, And Peyibomi Soyinka-Airewele, 'Forced Eviction and Rights-Based Approach to Development In Nigeria: A Case Of Makoko Community In Lagos State' *African Population Studies* 34, No. 2 (2020) (34)(3) : 5197-5206.

³³Collins H Wizer and Chike Arinze Emerueh, 'Perceived Impact of Urban Waterfront Dwellers' Forced Eviction on Housing, Security and Social Support System in Njemanze and Otodo-Gbame Informal Settlements, Nigeria' *Asian Research Journal of Arts & Social Sciences* (2020)(10)(2): 43-56.



challenges faced by marginalised urban communities in Nigeria. Makoko, a historic fishing settlement built on stilts over the Lagos Lagoon, has faced repeated threats of eviction and demolition by government authorities seeking to redevelop the waterfront for commercial and residential purposes. Despite resistance from residents and advocacy efforts by civil society organisations, the community remains vulnerable to displacement and land grabbing, highlighting the unequal power dynamics and lack of legal recognition for informal settlements in urban planning processes.³⁴

- iii. **Ogoni Indigenous Communities, Niger Delta Region:** The land grabbing and environmental degradation experienced by indigenous communities in the Niger Delta region exemplify the intersection of land rights, resource exploitation, and environmental justice issues in Nigeria. For decades, oil companies have acquired vast tracts of land for oil exploration and extraction, displacing indigenous communities and causing widespread environmental pollution and ecosystem degradation. The Ogoni people, in particular, have been disproportionately affected by land grabbing and environmental injustice, leading to social unrest, conflict, and human rights abuses. Despite international attention and advocacy efforts, the plight of the Ogoni and other indigenous communities in the Niger Delta underscores the need for stronger legal protections for land rights and environmental justice.³⁵
- iv. **Agribusiness Land Acquisitions:** The acquisition of land for large-scale agricultural projects by multinational corporations, such as the case of the Okomu Oil Palm Company in Edo State.³⁶

³⁴Olumuyiwa Ajayi, Peyi Soyinka-Airewele, and Olugbemisola Samuel, 'Gentrification And The Challenge Of Development In Makoko, Lagos State, Nigeria: A Rights-Based Perspective' *Environmental Justice* (2019)(12)(2): 41-47.

³⁵Ben Naanen, 'The Nigerian state, multinational oil corporations, and the indigenous communities of the Niger Delta' *The Politics of Resource Extraction: Indigenous Peoples, Multinational Corporations and the State* (2012): 153-179.

³⁶E. C., Merem, Y. A. Twumasi, J. Wesley, D. Olagbegi, M. Crisler, C. Romorno, and M. Alsarari, "Appraising the Changing Trends in Oil Palm Farming in Nigeria's Lower South Region." *International Journal of Ecosystem* (2020) (10)(1): 1-22.



4. Legal Framework on Land Grabbing and Forced Evictions in Nigeria

Nigeria's legal framework governing land rights and evictions comprises a complex array of constitutional provisions, statutory laws, customary practices, and international human rights standards. Understanding this framework is essential for addressing land-related conflicts, ensuring tenure security, and protecting the rights of affected communities. International human rights instruments provide a robust framework for addressing the issues of land grabbing and forced evictions in Nigeria, ensuring the protection of fundamental rights and promoting social justice. Several instruments play a significant role in shaping this framework:

- 1) Universal Declaration of Human Rights³⁷ (UDHR) was adopted by the United Nations General Assembly in 1948, and the UDHR enshrines the right to adequate housing in Article 25. It emphasises that everyone has the right to a standard of living adequate for their health and well-being and that of their families, including housing. Additionally, Article 17 of the UDHR prohibits arbitrary interference with an individual's privacy, home, and correspondence, safeguarding against arbitrary deprivation of property.³⁸
- 2) International Covenant on Economic, Social and Cultural Rights (ICESCR)³⁹ This covenant, adopted in 1966, recognises the right to adequate housing as part of the right to an acceptable standard of living, as articulated in Article 11. It obliges states parties to take steps to ensure access to adequate housing for all individuals and communities, including measures to prevent forced evictions and provide remedies for those affected.⁴⁰

³⁷ Universal Declaration of Human Rights (adopted 10 December 1948 UNGA Res 217 A(III) (UDHR)

³⁸ Ibid.

³⁹ International Covenant on Economic, Social and Cultural Rights (adopted 16 December 1966, entered into force 23 March 1976) 2200A (XXI) (ICESCR).

⁴⁰ Ibid.



- 3) Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)⁴¹ adopted in 1979, is a landmark treaty that affirms women's equal rights in various spheres, including land and property ownership. Article 14(g) of CEDAW mandates states parties to eliminate discrimination against women in rural areas and ensure their right to participate in and benefit from rural development, explicitly emphasising equal treatment in land and agrarian reform as well as in land resettlement schemes.
- 4) African Charter on Human and Peoples' Rights⁴² adopted by the Organization of African Unity (now the African Union) in 1981, the African Charter guarantees a range of civil, political, economic, social, and cultural rights to individuals and communities in Africa. Article 14 of the Charter recognises property rights and prohibits arbitrary displacement of individuals or communities from their lands, underscoring the importance of protecting land rights and preventing forced evictions.
- 5) **Constitutional Provisions:** The Nigerian Constitution guarantees the right to property, including land, as a fundamental human right. Section 43 of the Constitution⁴³ recognises the right of individuals to own and inherit property, subject to certain limitations in the public interest. Additionally, Section 15 guarantees the right to dignity of human persons, which encompasses protection against arbitrary evictions and forced displacements.
- 6) **Land Use Act of 1978**⁴⁴ is a pivotal piece of legislation that governs land ownership and administration in Nigeria. It vests all land within the territory of each state in the hands of the state governors, who hold such lands in trust for the benefit of the people. The Act also outlines land allocation, acquisition, and compensation procedures, providing a legal framework for addressing land-related disputes and preventing arbitrary land grabbing.

⁴¹UN General Assembly, Convention on the Elimination of All Forms of Discrimination Against Women, 18 December 1979, United Nations, Treaty Series, vol. 124

⁴² African Charter on Human and Peoples' Rights (adopted 27 June 1981, entered into force 21 October 1986) (1982) 21 ILM 58 (African Charter).

⁴³ Constitution of the Federal Republic of Nigeria (Third Alteration) Act, 2010 (Act No 3).

⁴⁴Chapter L5 Laws of the Federation of Nigeria 2004



Additionally, it emphasises the protection of customary land rights and the equitable distribution of land resources.

- 7) **Urban and Regional Planning Act**⁴⁵ enacted to regulate urban development and land use planning, this Act aims to ensure orderly growth and development in urban and regional areas. It establishes mechanisms for preparing and implementing master plans, zoning regulations, and development control measures to guide land use decisions and prevent unauthorised development and land grabbing. The Act also empowers relevant authorities to enforce planning regulations and take corrective actions to address violations, thus promoting sustainable land use practices and preventing arbitrary evictions.
- 8) **National Policy on Urban Development and Housing**⁴⁶: This policy document provides a comprehensive framework for promoting sustainable urban development and improving access to housing for all Nigerians. It emphasises the importance of community participation, social inclusion, and equitable access to land and housing, particularly for vulnerable groups such as low-income earners, women, and marginalised communities⁴⁷. The policy encourages the adoption of participatory planning processes, land regularisation schemes, and affordable housing programs to address the housing needs of urban populations and prevent forced evictions.
- 9) **Customary Laws**: Customary land tenure systems play a significant role in land governance in Nigeria, particularly in rural areas. Customary practices vary across ethnic groups and regions, with customary chiefs, village heads, or traditional rulers often serving

⁴⁵ Nigerian Urban and Regional Planning Act No. 88 of 1992.

⁴⁶ Adesoji David Jiboye, 'Urbanization Challenges And Housing Delivery In Nigeria: The Need For An Effective Policy Framework For Sustainable Development' *International Review of Social Sciences and Humanities* (2011)(2)(1): 176-185.

⁴⁷ Adewale Ibimilua, 'The Nigerian National Housing Policy in Perspective: A Critical Analysis' *Journal of Social Development in Africa* (2011)(26)(2): 165.



as custodians of communal lands⁴⁸. Customary laws and norms govern land allocation, use, inheritance, and dispute resolution within communities.

By enacting these laws and policies, Nigeria seeks to establish a legal framework that protects land rights, prevents arbitrary land grabbing, and promotes sustainable development practices. However, effective implementation, enforcement, and monitoring of these laws are crucial to ensure their success in addressing the root causes of land grabbing and forced evictions and safeguarding the rights and interests of all citizens.

5. Legal Implications of Land Grabbing and Forced Evictions

Land grabbing and forced evictions have significant legal implications in Nigeria, impacting various aspects of the legal framework, human rights, and access to justice⁴⁹. Some of the legal implications include:

- (a) **Violations of Property Rights:** Land grabbing and forced evictions often entail the unlawful or coercive land acquisition, leading to property rights violations. In Nigeria, the Constitution recognises the right to own property and prohibits arbitrary deprivation of property⁵⁰. However, forced evictions carried out without due process or adequate compensation constitute violations of property rights under both domestic and international law.
- (b) **Violations of Human Rights:** Land grabbing and forced evictions also result in widespread violations of human rights, including the right to adequate housing, the right to livelihood, the right to food, the right to water, and the right to health. These rights are enshrined in various international human rights instruments; forced evictions conducted without adequate notice, consultation, or resettlement plans often lead to homelessness,

⁴⁸Kojo Amanor, 'The Changing Face Of Customary Land Tenure' *Contesting land and custom in Ghana: State, Chief and the Citizen* (2008): 55-80.

⁴⁹Anthony Okoye, 'Rentierism, Land Grabbing and The Rights Of The Nigeria Indigenous Communities' (2019) (1): 76-92

⁵⁰Paul Ocheje, 'In the Public Interest: Forced Evictions, Land Rights and Human Development in Africa' *Journal of African law* 51, no. 2 (2007) (51) (2): 173-214.



deprivation, and social exclusion, violating the fundamental human rights of affected individuals and communities.⁵¹

- (c) **Challenges in Seeking Legal Redress:** Affected communities often face numerous challenges in seeking legal redress for land grabbing and forced evictions in Nigeria. The legal system may be inaccessible, expensive, or biased against marginalised groups, hindering their ability to assert their rights or challenge unlawful evictions. Lack of awareness, limited access to legal aid, and corruption within the justice further undermine the prospects of obtaining justice for victims of land grabbing.⁵² Additionally, the absence of precise legal mechanisms for land restitution or compensation exacerbates the challenges affected groups face in seeking redress for the harm caused by forced evictions.

Efforts to combat land grabbing and forced evictions must prioritise the rights and dignity of affected communities and individuals, ensure accountability for perpetrators, and uphold the rule of law to achieve justice and redress for victims.

7. Challenges Faced by Affected Communities and Stakeholders

Affected communities and stakeholders face a plethora of obstacles when attempting to address the pervasive issues of land grabbing and forced evictions in Nigeria. These challenges span multiple dimensions, including legal, social, economic, and institutional barriers, which collectively impede efforts to mitigate the adverse impacts of these practices.

When it comes to legal challenges, communities and persons affected often face challenges when trying to navigate the justice system to assert their rights to land and seek justice for any wrongs they have suffered. The complexity and lack of accessibility in legal procedures can pose significant challenges, especially for marginalised communities that require greater legal representation and awareness of their rights. In addition, existing loopholes in land laws and

⁵¹ Husen Ahmed Tura, 'Land Rights and Land Grabbing in Oromia, Ethiopia' *Land use policy* 70 (2018): 247-255.

⁵² Liz Alden Wily, 'The law and land grabbing: friend or foe?' *Law and Development Review* (2014) (7)(2): 207-242.



regulations, along with inconsistent enforcement, contribute to a sense of ambiguity and allow individuals to take advantage of vulnerabilities for their benefit.⁵³

On a societal level, affected communities face the challenge of dealing with stigma and marginalisation, as they are frequently seen as intruders or unauthorised residents on land that is at risk of being seized or forcibly vacated. This exclusion from society worsens their vulnerability and weakens their capacity to gather assistance or unity among their communities. In addition, the Act of forcibly evicting individuals from their homes has a detrimental impact on social connections and community unity, causing a breakdown in the very foundation of social interactions and diminishing the trust shared among neighbours.⁵⁴

From an economic standpoint, forced evictions have devastating consequences as they lead to the displacement of individuals and communities, causing them to lose their homes, livelihoods, and assets. Displaced families frequently face challenges in finding alternative housing or sources of income, which can lead to poverty and economic instability. In addition, the unfortunate consequence of grabbing productive land or resources is that it deprives communities of essential sources of sustenance, worsening food insecurity and poverty. Land grabbing and forced evictions frequently lead to environmental degradation, such as deforestation, soil erosion, and pollution. Communities relying on natural resources for their livelihoods bear the brunt of environmental devastation, which worsens poverty and food insecurity.⁵⁵

Addressing land grabbing and forced evictions is hindered by weak governance structures and corruption at the institutional level. The lack of proper enforcement of land laws and regulations and corruption within regulatory bodies create an environment where those who break the rules face no consequences and accountability mechanisms are weakened. In addition, the lack

⁵³Henry Uche Obuene, Olayinka Akanle, and Ayokunle Olumuyiwa Omobowale, 'Land Grabbing and Resistance of Indigenous Landowners in Ibadan, Nigeria' *International Sociology* (2022) (37)(1):143-159.

⁵⁴Anis Karodia, Paresh Soni, Shaeed Bayat, and Dhiru Soni, 'The Land Question In Africa: Reinventing Exploitation, Engendering Displacement And Foreboding Catastrophe' *International Journal of Afro-Asian Studies* (2013) (4)(2) : 12-29.

⁵⁵Frances Thomson, 'Why We Need the Concept Of Land-Grab-Induced Displacement' *Journal Of Internal Displacement* (2014) (4)(2): 42-65.



of coordination and collaboration among government agencies and civil society organisations hinders the ability to address these issues comprehensively.⁵⁶

These multifaceted challenges underscore the complex nature of addressing land grabbing and forced evictions in Nigeria, necessitating holistic and concerted efforts from various stakeholders to enact meaningful change and safeguard the rights and well-being of affected communities.

8. The Role of Government Institutions and Agencies

Government institutions and agencies in Nigeria are vital in preventing land grabbing and forced evictions. They achieve this by implementing and upholding laws and policies that protect the rights of landowners and communities.⁵⁷ Government institutions and agencies play crucial roles in this regard:

- 1) **Legislative Framework:** Government institutions have to create and uphold an effective legislative framework that protects land rights and oversees land transactions. This involves the implementation of legislation that establishes regulations on land ownership, tenure systems, and the processes for acquiring and disposing of land.⁵⁸
- 2) **Law Enforcement:** Government agencies, including the police and judiciary, uphold land laws and regulations to deter unlawful land acquisition and evictions. Law enforcement agencies must thoroughly investigate any reports of land-related violations, take legal action against those responsible, and enforce court orders on land disputes effectively.⁵⁹
- 3) **Land Administration:** Government agencies involved in land administration, such as land registries and cadastral offices, have a crucial role in upholding the transparency

⁵⁶Anis Karodia,(n 54).

⁵⁷Noah Echa Attah, 'Possession by Dispossession: Interrogating the New Wave of Land Grabbing in Nigeria' *Journal of Land and Rural Studies* (2013) (1)(2): 213-228.

⁵⁸ Ibid.

⁵⁹ Ibid.



and integrity of land transactions. These agencies need to enforce the laws with utmost accuracy in maintaining land records, ensuring the validity of land titles, and effectively deterring any attempts at fraudulent land transfers. Furthermore, to prevent forceful evictions and land grabbing, government agencies should set up systems for oversight and monitoring. This entails routine inspections of real estate transactions, development initiatives, and eviction procedures to guarantee adherence to legal and regulatory requirements.

- 4) Urban Planning and Development: Government institutions involved in urban planning and development play a crucial role in ensuring that land use planning processes are inclusive, participatory, and respectful of community rights. It is vital for urban development plans to give utmost importance to the well-being of local communities and take necessary measures to prevent any instances of forced evictions.⁶⁰
- 5) Consultation and Participation: It is crucial for government institutions to involve affected communities and stakeholders in decision-making processes concerning land use and development. This involves engaging with communities before initiating development projects that could impact their land rights and ensuring that their concerns are duly considered.⁶¹
- 6) Capacity Building: It is necessary for government institutions to prioritise investing in developing their staff members' knowledge and skills. These will significantly contribute to their understanding of land laws, human rights principles, and conflict resolution mechanisms. Training programmes can equip government officials with the necessary skills and knowledge to effectively and sensitively handle land-related issues.⁶²

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² Paul Ocheje, (n 52).



In a nutshell, preventing land grabbing and forced evictions in Nigeria requires proactive measures by government institutions and agencies to protect land rights, encourage community engagement, and hold violators accountable for land-related offences.

9. Legal Mechanisms for Ensuring Transparency in Land Transactions in Nigeria

Maintaining transparency in land transactions is of utmost importance in Nigeria as it safeguards the rights of landowners and communities, promotes equity, and prevents corruption. Various legal mechanisms have been implemented to address these challenges and enhance transparency and accountability in land governance. These mechanisms encompass a range of initiatives discussed below:

Implementing comprehensive land registration and title systems can greatly improve transparency in land transactions. Establishing formal land ownership and documenting transactions offers a clear and reliable legal framework, minimising the risk of conflicts and illicit practices. Creating systems for public access to land records fosters transparency by enabling individuals and organisations to acquire information on land ownership, transactions, and land-use planning. This level of accessibility promotes a sense of responsibility and supervision, allowing interested parties to track and observe land-related operations effectively.⁶³

Mandating the disclosure of beneficial ownership and financial interests in land transactions is crucial in ensuring transparency and combating corruption. The requirement that parties participating in property transactions disclose pertinent information increases transparency and allows authorities and the public to thoroughly analyse transactions for any possible irregularities or conflicts of interest.⁶⁴

⁶³Ahiakwo Grace Abraham, 'Land Title Perfection and Legal Issues and Challenges of Land Registration in Nigeria' *International Journal of Research and Innovation in Social Science* (2023)(7)(2): 899-916.

⁶⁴ Ibid.



Utilising technology to digitise land records and transactions has the potential to enhance transparency, accessibility, and efficiency greatly. Digital platforms provide stakeholders with convenient access to land-related information online, streamlining administrative processes and reducing the potential for manipulation or corruption that can arise from manual record-keeping.⁶⁵

To guarantee transparency and accountability, it is essential to include communities and persons affected in decision-making processes concerning land transactions. Encouraging the involvement of various parties through public consultations, hearings, and participatory planning processes helps to build trust, enhance transparency, and enables the recognition of community interests and concerns.⁶⁶

Implementing impartial oversight bodies monitoring and regulating land transactions promotes transparency and accountability. These bodies have the authority to perform audits, investigations, and inspections to ensure that legal requirements and standards are followed. This helps prevent misconduct and encourages the adoption of best practices. Implementing measures to combat corruption and enforcing mechanisms is crucial to prevent bribery, fraud, and other forms of corruption in land transactions. Robust anti-corruption measures, effective enforcement agencies, and safeguards for whistleblowers play a crucial role in uncovering and preventing illicit activities, thereby ensuring the integrity of land governance systems.⁶⁷

Enhancing the ability to challenge non-compliance with transparency requirements bolsters accountability in land transactions. The availability of judicial review, administrative appeals, and complaint mechanisms allows individuals who have been wronged to seek justice and hold accountable those who have violated transparency standards. Providing land administration officials, legal professionals, and stakeholders with the necessary knowledge and skills to foster transparency in land transactions is crucial. Ensuring that land governance practices align with

⁶⁵ D Didigwu and A Osarenkhoe, 'Automated Land Registration in Edo State, Nigeria' *British Journal of Environmental Sciences* (2015) (3) (5): 1 -9.

⁶⁶ Ibid.

⁶⁷ B Adeyinka, 'Transparency in Land Title Registration: Strategies to Eradicate Corruption in African Land Sector' *African Journal on Land Policy and Geospatial Sciences* 2020) (3) (5) 162-173.



international standards and best practices to promote transparency, accountability, and integrity in land transactions is essential. By tapping into international expertise and best practices, Nigeria can incorporate successful strategies and tailor them to fit local circumstances, thereby enhancing the efficiency of transparency mechanisms.

10. Legal Remedies for Communities Affected by Land Grabbing and Forced Evictions

Communities affected by land grabbing and forced evictions in Nigeria have access to various legal remedies aimed at protecting their rights and seeking redress for injustices. Some of these legal remedies include:

1. **Judicial Review:** Affected communities can seek judicial review of eviction orders or land acquisition decisions to challenge their legality and ensure compliance with due process. Through the courts, communities can challenge the basis for eviction, demand compensation for losses incurred, and seek injunctive relief to halt eviction proceedings pending resolution of legal disputes.⁶⁸
2. **Compensation Claims:** Communities facing forced evictions are entitled to compensation for any loss or damage suffered due to the eviction. Nigerian law recognises the right to fair and adequate compensation for property taken or destroyed, including land, crops, and buildings. Affected communities can file compensation claims against the government or private entities responsible for the eviction.⁶⁹
3. **Public Interest Litigation:** Public interest litigation allows civil society organisations and legal advocates to take legal action to challenge unjust land grabbing and forced evictions on behalf of affected communities. Through public interest litigation,

⁶⁸Paul Ocheje(n 52).

⁶⁹Chester Hartman, and David Robinson, 'Evictions: The Hidden Housing Problem' *Housing Policy Debate* (2003) (14)(4): 461-501.



communities can seek judicial remedies, advocate for policy reforms, and hold those responsible for violating land and human rights accountable.⁷⁰

4. Human Rights Complaints: Communities can file complaints with human rights bodies, such as the National Human Rights Commission (NHRC) or international human rights mechanisms, to seek redress for violations of their rights related to land grabbing and forced evictions. Human rights complaints can lead to investigations, recommendations for remedial action, and public scrutiny of government actions.⁷¹

5. Alternative Dispute Resolution: Alternative dispute resolution mechanisms, such as mediation and arbitration, offer communities an opportunity to resolve land-related disputes through negotiation and consensus-building without resorting to lengthy and costly litigation⁷². These mechanisms help communities reach mutually acceptable agreements with land grabbers or government authorities while preserving relationships and community cohesion.

11.The Challenges in Enforcing and Protecting Legal Rights

Although legal remedies and protections exist for affected communities and individuals facing land grabbing and forced evictions in Nigeria, numerous challenges and gaps persist in their implementation and enforcement.

- i. **Procedural Barriers:** Legal proceedings can be complex, time-consuming, and costly, posing barriers to access to justice for marginalised communities. Procedural requirements, such as filing fees, court delays, and language barriers, may deter affected communities and individuals from pursuing legal remedies.⁷³

⁷⁰Paul Ocheje(n 50).

⁷¹Chester Hartman (n 71).

⁷²Mutuku, Benson, Jane Alaii, Anja Krumeich, and Ingrid Westerndorp, 'Formal Justice and Alternative Dispute Resolution on Land Based Conflicts in Kenya' *International Journal of Gender Studies* 7, no. 1 (2022) (7)(1): 1-19.

⁷³[Chibuzor Nwobueze](#) ,James Okolie-Osemene, and Ndu John Young, 'The State, Urban Displacement and Land Rights in Nigeria' *Advances in Social Sciences Research Journal* (2018) (5)(8):88-91.



- ii. **Inadequate Legal Aid:** Limited availability of legal aid services and resources hampers the ability of affected communities to obtain legal representation and access to justice. Legal aid organisations may lack funding, staff, and expertise to assist communities and persons facing land grabbing and forced evictions.⁷⁴
- iii. **Corruption and Influence:** Corruption within the judiciary, law enforcement agencies, and government institutions undermines the impartiality and integrity of legal processes. Bribery, political interference, and undue influence may result in biased decisions, delayed justice, or outright denial of remedies.⁷⁵
- iv. **Weak Enforcement Mechanisms:** Even when legal remedies are available, enforcement mechanisms may be weak or ineffective in ensuring compliance with court orders and judgments. Lack of enforcement of court decisions allows perpetrators of land grabbing and forced evictions to evade accountability and perpetuate abuses with impunity.⁷⁶
- v. **Awareness and Education:** Many affected communities and individuals lack understanding of their legal rights and the available remedies for land grabbing and forced evictions. Limited access to legal information, education, and advocacy resources impedes their ability to assert their rights, navigate legal processes, and seek redress for violations.⁷⁷

Tackling these challenges necessitates a collaborative approach from governmental institutions, civil society, and international partners to strengthen legal frameworks, improve access to justice, and hold those liable for land-related violations accountable.

12 The Role of Civil Society in Preventing Land Grabbing and Force Evictions

- a) **Promoting Advocacy and Awareness:** Civil societies have a crucial role in increasing public knowledge about land rights, land tenure systems, and the impacts of land grabbing.

⁷⁴ Ibid.

⁷⁵ Maureen Sweeney, 'Enforcing/Protection' *Administrative Law Review* (2019) (7)(1): 127-192.

⁷⁶ Ibid.

⁷⁷



They actively participate in advocacy campaigns, workshops, and community dialogues to educate citizens, policymakers, and local leaders. By giving a platform to those impacted, civil societies encourage a sense of responsibility and enable individuals to safeguard their property.⁷⁸

- b) **Strengthening Legal Empowerment:** Civil societies strive to enhance the legal frameworks on land ownership, land use, and eviction procedures. They offer assistance and support to marginalised communities at risk of being evicted. Through their efforts to enhance legal literacy, they enable individuals to assert their rights and pursue justice through proper legal avenues.⁷⁹
- c) **Monitoring and Documentation:** Civil societies monitor land transactions, acquisitions, and development projects. They meticulously record instances of land grabbing, coerced displacements, and infringements upon human rights. This evidence is of utmost importance for advocacy, litigation, and policy reform.⁸⁰
- d) **Community Mobilisation:** Civil societies support community organising and mobilisation efforts. They advocate for collective action, solidarity, and resistance against those who unlawfully seize land. By organising community meetings, participating in protests, and engaging in peaceful demonstrations, they form a solid collective force to combat unlawful land acquisitions.⁸¹
- e) **Collaboration with Government and Institutions:** Civil societies work with government agencies, local authorities, and traditional leaders. They strongly support the importance of transparent land governance, inclusive decision-making processes, and active community

⁷⁸Thania Paffenholz, and Christoph Spurk, 'Civil Society, Civic Engagement, and Peacebuilding' *Social Development Papers: Conflict Prevention and Reconstruction* (2006) (36) (2006): 10-55.

⁷⁹ Ibid.

⁸⁰Busscher, Nienke, Frank Vanclay, and Constanza Parra, 'Reflections on How State–Civil Society Collaborations Play Out in The Context of Land Grabbing in Argentina' *Land* (2019) (8)(8): 1-16.

⁸¹ Ibid.



engagement in land management. Through fostering collaboration, civil societies significantly shape policies and practices that safeguard land rights.⁸²

- f) **Strengthening Communities:** Civil societies empower local communities to protect their land rights. They provide training programmes that cover negotiation skills, conflict resolution, and sustainable land management. Enhancing community resilience is crucial in preventing the unjust acquisition of land.⁸³

Civil societies play a crucial role in Nigeria as their dedicated work helps to create a fair and reliable land tenure system that benefits all individuals.

13. Conclusion

Land grabbing and forced evictions in Nigeria pose a crucial concern for marginalised communities, indigenous peoples, and vulnerable populations. These actions result in displacement, loss of livelihoods, environmental degradation, and the infringement of fundamental rights. Despite a comprehensive legal framework, there are still ongoing challenges when it comes to effectively implementing it. Community responses and advocacy are vital in addressing land grabbing and promoting sustainable development. It is essential for all parties involved to maintain a sense of unity and engage in ongoing advocacy efforts.

14. Recommendations

- 1) **Addressing Underlying Causes:** Promoting land use planning strategies, poverty alleviation initiatives, and strengthening community-based conflict resolution mechanisms are crucial for reducing socio-economic disparities and preventing violent evictions.
- 2) **Legal Reforms:** The Land Use Act needs revision to enhance land rights protection, streamline tenure arrangements, establish fair eviction procedures, and allocate resources for marginalised communities.

⁸²Camilla Toulmin, 'Securing Land and Property Rights in Sub-Saharan Africa: The Role of Local Institutions' *Land Use Policy* (2009) (26)(1): 10-19.

⁸³ Ibid.



- 3) **Promoting Accountability and Transparency:** Establish independent oversight bodies to monitor land transactions, investigate allegations of corruption or malfeasance in land governance, and ensure government officials and private actors are held accountable for violations of land rights. Implement measures to improve transparency in land administration processes, such as digitising land records, providing public access to land information, and regularly publishing data on land transactions and development projects. Offer training and capacity-building programmes to government officials in land administration, law enforcement, and judicial proceedings.
- 4) **Community Empowerment and Participation:** Support community land titling initiatives to legalise customary landowners' rights, protect tenure, and prevent land grabbing. Promote public awareness about land rights, legal remedies, and justice options to empower communities to advocate for their rights and interests.

These reforms will assist in the development of a land tenure system that is sustainable, fair, and equitable and upholds the rights and dignity of every citizen.