



CHALLENGES & PROSPECTS: ENVIRONMENTAL LAW FRAMEWORK FOR SUSTAINABLE DEVELOPMENT IN LAGOS STATE

THOUGHT LEADERSHIP BY:

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*“If we do not take care of our environment, who will?
Most importantly, where would we live in?”*

The idea of Sustainable Development (SD) recognizes that a healthy natural environment is an essential foundation for long lasting social and economic development. The Nigerian regulatory framework recognizes this by imposing environmental related obligations on the government and citizens (corporates and individuals). For example, **Sections 17(2) (d) and 20 1999 Constitution of the Federal Republic of Nigeria¹(1999 Constitution)** provides respectively that: *“Exploitation of human and natural resources in any form whatsoever for reasons other than the good of the community shall be prevented”, and “The State shall protect and improve the environment and safeguard the water, air and land, forest and wild life of Nigeria.”*



THE WASTE DUMPSITE COULD BE CONVERTED TO REVENUE GENERATION CENTER FOR THE STATE BY TURNING THE PLACE INTO A MASSIVE RECYCLING HUB TO PRODUCE RAW MATERIALS FOR OTHER PURPOSES

In line with the foregoing, Lagos State Government (LASG) has the responsibility to manage and promote sustainability. The challenges in this regards can never be

¹ As amended - Cap. C23, Laws of the Federation of Nigeria (LFN), 2004.

over emphasized given the status of Lagos as the premier hub of the Nigerian economy and actualization of its global megacity aspirations. SD in Lagos State is therefore a top burner issue that should rightly be an integral part of LASG development plans. We proceed to examine the regulatory framework through review of relevant Federal and State provisions.

A. Federal Regulatory Framework

i. The 1999 Constitution

As noted earlier, the **1999 Constitution**, Nigeria's grundnorm makes provisions for the protection of the environment.² Pursuant to **Section 17(2)(d)**, in the exploitation of natural resources, the good of the community must be considered: the government has a duty to ensure that such exploitation will not damage the environment, and thus expose citizens to danger. Hence the need for regulatory oversight of such activities with significant environmental impact.

Sections 33(1) and **34(1)** provides for the right to life and right to dignity of the human person respectively; it is respectfully submitted that such includes the right to a clean, poison/pollution free, healthy environment for all citizens. **Sections 33** and **34** can arguably be linked to the need for a healthy environment (and which

government is responsible for by **Sections 17** and **20**), in order to give effect to these constitutional rights.³

In line with the constitutional basis for federal legislative action (through the National Assembly) on the environment, many Acts have been enacted with provisions also applying to Lagos State, we proceed to discuss some key highlights of some of these legislation.⁴

ii. National Environmental Standards and Regulations Enforcement Agency Act 2007 (NESREAA)

This **Act** replaced the **Federal Environmental Protection Agency Act (FEPA), 1988** and seeks to protect/promote the SD of the environment and its natural resources. **Section 7** provides for NESREA's main functions. NESREA as an agency under the Federal Ministry of Environment (FME), is charged with the protection of Nigeria's environment, being vested with authority to ensure compliance with environmental laws, environmental sanitation, pollution prevention and control through monitory and regulatory measures.

Section 8(1)(k) NESREAA makes and reviews regulations on air and water quality, effluent limitations,

control of harmful substances and other forms of environmental pollution and sanitation. By **Section 21**, wherever hazardous substances are discharged in contravention of **Section 20**, an owner or operator of the facility in question shall also be liable for the cost of their removal, restoration, or replacement of damaged natural resources and reparations, restoration, restitution or compensation as may be determined by the NESREA from time to time. There are however exceptions where the discharge is proved to have been caused by a natural disaster, act of war or sabotage.

Section 27 prohibits, without lawful authority, the discharge of hazardous substances into the environment. For example, in October 2015, the premises of a Lagos-based company, Nigerian Aluminum Extrusions Ltd (NIGALEX) was sealed for violation of NESREAA environmental requirements. NIGALEX was reportedly served numerous violation and abatement notices prior to the exercise, regarding the disposal of their waste and untreated effluents, but apparently did not take satisfactory remediation action. NESREA's enforcement action was to send a message that companies and industries should buy into the compliance

² **Sections 17** and **20 1999 Constitution** cited above are contained in **Chapter II – (Fundamental Objectives and Directive Principles of State Policy)**, which unfortunately by **section 6(c) 1999 Constitution** are non-justiciable. However, provision of a safe environment is one of the fundamental human rights in **Chapter 4** (see **section 33**). Accordingly, breach of environmental obligations could amount to breach of fundamental human rights, which is justiciable. **Section 1(1)1999 Constitution** provides that: "This Constitution is supreme and its provisions shall have binding force on all authorities and persons throughout the Federal Republic of Nigeria." By **Section 1(3)**: "If any other law is inconsistent with the provisions of this Constitution, this Constitution shall prevail, and that other law shall to the extent of the inconsistency be void."

³ See for example, **A-G Lagos State v. A-G Federation & 35 Ors.** [2003] 12 NWLR (Pt. 833) 1; (2003) LPELR-620(SC) and **Chevron Nigeria Limited v. A-G Delta State & Anor** (2018) LPELR-44837 (CA).

⁴ Apparently, the environment was not listed under the **Legislative or Concurrent List (Parts I and II, Second Schedule)** of the **1999 Constitution**. That would mean that it is a matter under the **Residual List (Part III)**, a result which would be absurd; the 'reasonable' view (espoused in See **A-G Lagos State v. A-G Federation & 35 Ors (supra)**) is that it is a concurrent item. This omission has attracted the attention of the Assembly. See '**National Assembly Moves to Add Environment Matters to Concurrent Legislative List**', *Premium Times*, 03.10.2017: (<https://www.premiumtimesng.com/news/more-news/244920-national-assembly-moves-add-environment-matters-concurrent-legislative-list.html>) (accessed 24.05.2019).

⁵ *Cap. N164, LFN 2004.*

WHILST DREDGING FROM THE ATLANTIC TO RECLAIM LAND FOR DEVELOPMENT IS NOT NEW, WHAT IS MOST CRITICAL IS THAT IN-DEPTH STUDIES MUST BE DONE OVER A PERIOD OF TIME TO KNOW THE TIDAL MOVEMENT. WHERE STUDIES HAVE SHOWED THAT THE TIDAL MOVEMENT IS LIKELY TO AFFECT THE ENVIRONMENT, SUCH PROJECT WILL BE STOPPED



programme and imbibe the culture of respecting and obeying laws to sanitize the environment.⁶

iii. Environmental Impact Assessment Act (EIAA)⁷

The **EIAA** assesses the probable negative impacts public or private projects have on the environment. **Section 2** provides that the public or private sector of the economy shall not undertake/embark on, authorise projects/activities without prior consideration of the effect on the environment. **Section 3 (1)** stipulates: “In identifying the environmental impact assessment process under this Act, the relevant significant environmental issues shall be identified and studied before commencing or embarking on any project or activity covered by the provisions of this Act or covered by the Agency or likely to have serious environmental impact on the Nigerian environment.”

According to an environmental scientist, Professor Oladele Osibanjo, the utilization of sand dredging for land reclamation is problematic. Thus, whilst dredging from the Atlantic to reclaim land for development is not new, what is most critical is that in-depth studies must be done over a period of time to know the tidal

movement.⁸ It is important to note that where studies have showed that the tidal movement is likely to affect the environment, such project will be stopped.⁹

Section 3 (2) EIAA further provided that “Where appropriate, all efforts shall be made to identify all environmental issues at an early stage in the process.” In 2015, a public interest group, Legal Defense and Assistance Project (LEDAP), filed an application at the Federal High Court in **LEDAP v. Lagos State and South Energyx Nigeria Limited**¹⁰ to restrain the Defendants from continuing with the Eko Atlantic City project on the coastline of Victoria Island until they have carried out an EIA on the project. The Plaintiffs alleged that the impact of the construction without an EIA poses great danger to Lagos residents and all coastal communities in Nigeria and neighboring countries like Benin Republic, etc. As a result of the suit, the Defendants carried out an EIA before continuing with the project.¹¹

In **Helios Towers Nig. Ltd v. NESREA & Anor**,¹² Wambai JCA, opined:

“... An environment assessment thus means an assessment of the environmental effect of the project conducted in accordance with the Act and any regulations made

thereunder? It follows that any major developmental project within the coverage of this Act, and which is likely to affect the environment, or undermine its quality requires an environmental impact assessment to be carried out before approval would be granted for its execution to ensure that all measures necessary to be taken to protect the environment are taken care of.”

B. Lagos State Regulatory Framework

Flowing from the mandate from **section 20 1999 Constitution** on all States to protect their environment, the LASG enacted several primary and secondary legislation including the following:

I. The Lagos State Environmental Protection Agency Law (LASEPAL)¹³

Section 7 LASEPAL provides for its

⁶ Cyriacus Nnaji, ‘NESREA Seals Lagos-Based NIGALEX for Violating Environmental Laws’, *The Guardian*, 5.10.2015: <<https://guardian.ng/news/nesrea-seals-lagos-based-nigalex-for-violating-environmental-laws/>> (accessed 28.05.2018).

⁷ *Cap. E12, LFN 2004.*

⁸ ‘LEDAP Sues Lagos, South Energyx to Provide Impact Assessment or Stop Eko Atlantic Project’, *City Voice*, 14.01.2016: <<https://cityvoiceng.com/ledap-sues-lagos-south-energyx-to-provide-impact-assessment-or-stop-eko-atlantic-project/>> (accessed 28.05.2018).

⁹ *Section 21 EIAA.*

¹⁰ *Suit No. FHC/L/CS/949/15.*

¹¹ *LEDAP case (supra).*

¹² (2014) LPELR-24624 (CA).

¹³ *Cap. L23, Laws of Lagos State 2017.*

functions to include monitoring and controlling the disposal of waste in LS and advising LASG on all environmental management policies. **Section 21 LASEPAL** requires any person manufacturing or storing chemicals, lubricants, petroleum products, cement and other material used in building, radioactive materials, or gases in residential or commercial areas, to obtain a permit. The permits are typically not transferable as they are project-specific. Where such permits are to be transferred, the prior consent of the regulator will be required.

ii. Lagos State Waste Management Authority Law No. 5 of 2017 (LAWMAL)¹⁴

LAWMA was setup by the LASG to manage waste generated in the State, collecting and transporting domestic, commercial and medical waste through Private Sector Participants (PSPs). In the furtherance of its enabling law, LAWMA engaged ‘Litter Marshals’, charged with the responsibility of cleaning the highways, which was challenging for LAWMA, because of problematic littering. Also, over 90 PSP companies registered with LAWMA to provide cleaning/sweeping services at

various strategic urban locations in the State.¹⁵

LASG also developed the now defunct Cleaner Lagos Initiative (CLI) geared towards meeting the current and future sanitation demands, to transform and beautify the landscape of the State. The CLI is focused on improving the environment to make it cleaner, safer and healthier for all Lagosians by promoting a harmonized and holistic approach to the challenges; and as a result, improving operational efficiency of the Visionscape Group contracted for this purpose.

According to LAWMA, CLI is geared towards addressing, enforcing and regulating the challenges in the solid waste management systems within LS, while also aiming to protect the environment, human health and social living standards of Lagosians. CLI is aimed at achieving better results in managing the waste of the State. To achieve this, the LASG contracted Visionscape Group to implement its CLI in 2017.¹⁶ With

this medium, LASG plans to campaign for behavioral change among residents, to embrace the three Rs’ concept of *Reduce, Reuse and Recycling* of waste and conserve resources for benefit of the environment.¹⁷

iii. Lagos State Environmental Management Protection Law 2017 (LSEMPL)

LSEMPL consolidates all the Laws and Regulations applicable to the management, protection and sustainable development of the environment in Lagos State.

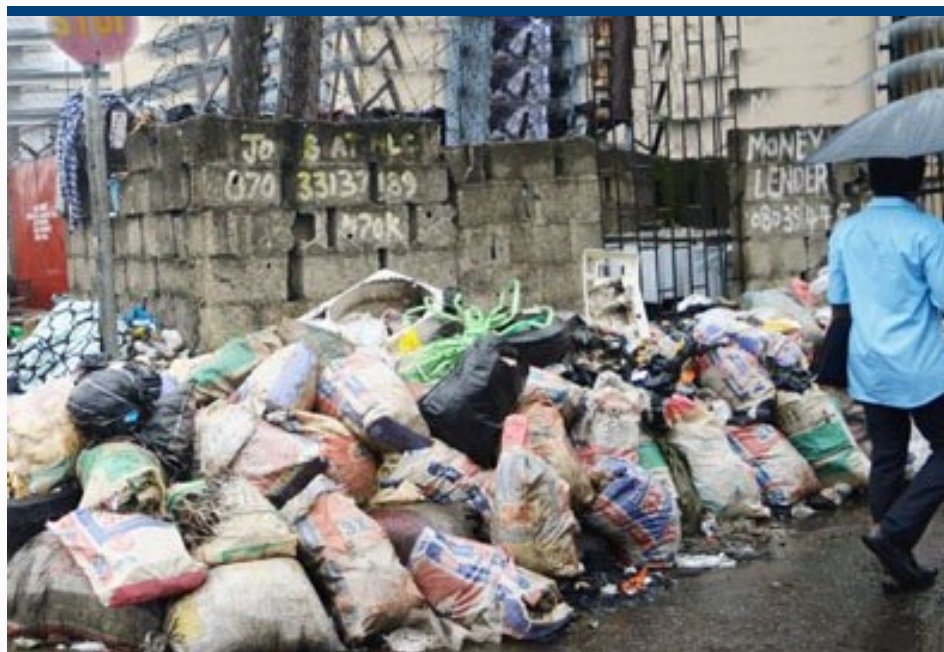
The **LSEMPL** has fourteen (14) Parts, with 526 Sections, various Schedules and is 239 pages long. It considerably attempts to delve into more modern cosmopolitan environmental issues like waste management, litter, dumping of untreated toxic and or radioactive material into public drains, sanitation, street trading and hawking, obstruction to drainage systems, water generation, effluents, noise, signage, advertisement, gardens and parks, etc.

¹⁴ Cap. L74, Laws of Lagos State 2017.

¹⁵ ‘Highway Sanitation’, LAWMA 2019: <<http://www.lawma.gov.ng/highway-sanitation-2/>> (accessed 13.02.2019).

¹⁶ ‘LAWMA welcomes SA to the Governor on CLI’, LAWMA, 04.23.2018: <<http://www.lawma.gov.ng/2018/04/23/lawma-welcomes-sa-to-the-governor-on-cli/>> (accessed 02.05.2018).

¹⁷ ‘Visionscape, Ambode’s New Waste Management Company Struggles to Keep Lagos Clean’, Sahara Reporters 19.02.2018. <<http://saharareporters.com/2018/02/19/visionscape-ambodes-new-waste-management-company-struggles-keep-lagos-clean/>> (accessed 02.05.2018).



Section 121 provides that the dumping and burying of any untreated, injurious gases, toxic or radioactive waste or substances, without a government issued permit is expressly prohibited and punishable with fines.¹⁸

Sections 125 makes provision for the maintenance of Drains, Sewage and Tanks services are properly carried out in the State. It is important to note that **Section 214** also provides for the establishment of the Lagos State Water Corporation (LSWC) which has similar functions in respect of water/wastewater and, licensing functions. For example, **Section 217(d)** provides that LSWC shall control and manage all waterworks and ground water services in the State.

Section 253(1) states that: “A person may without obtaining a licence from the corporation, allow, construct, dig or extend any well, borehole or other work in a residential premises for the purpose of abstraction of water supply and to an extent necessary for a supply of water for the domestic.

(2) any person constructing or extending and well, borehole or other work under (1) of this section shall comply with all regulations made pursuant to this part regarding construction of wells,



borehole, etc. These provisions are to safeguard public health and safety.

Challenges and Prospects

For environmental legislation to ‘work’, they must not only be well designed but also efficiently and effectively enforced. Strategies must be developed as to how regulators should go about interventions to ensure compliance. While challenges of enforcement of environmental laws are universal, those of Lagos includes the following:

1. Inadequate Dumpsites

Whilst waste was disappearing from the roads and residential areas houses, it must of necessity have been building up elsewhere and could constitute potentially catastrophic incidences. Ideally, waste sorting, recycling and disposal should occur at an engineered landfill, but for decades Lagos only had dumpsites at Ojota, Solous, Ikorodu, and Igando. Sometime in 2018, there was a devastating fire outbreak at the Ojota dumpsite caused by trapped gas from the waste which escaped and formed combustion, this resulted in LASG shutting it down.¹⁹ It is in this light, that the LASG as part of the comprehensive plan towards achieving a clean and healthy environment under the CLI, commenced the construction of the first engineered sanitary landfill in West Africa located in Epe.²⁰

2. Low Environmental Law Awareness/ Appreciation of Hygienic Environment

This point is evident from the public's contribution to the eyesore that many parts of LS represent for example with refuse, blocked drainages, etc. Awareness should be made all around the State; local governments or the local offices of environmental regulators can be effective agents in educating the public on the dangers and the effects of a polluted environment. Grassroots mobilisation can be multipronged through mass media, community and trade associations, religious bodies, etc to achieve the widest and consistent dissemination of health impacting information. Instead of waiting on the government, individuals and communities should also be encouraged to participate in environmental improvements and sanitation.

18 **First Schedule, LSEMPL**, makes provision for a fine of ₦5,000 - ₦10,000 be paid by anyone charged with improper disposal of refuse without a government issued permit.

19 Muritala Ayinla, ‘Lagos Shuts Olusosun Dumpsite, Blames Fire on Gas Emission’, *New Telegraph*, 16:03:2018: <> (accessed 02.05.2018).

20 Kazeem Ugobodaga, ‘Lagos Begins Construction of First Engineered Sanitary Landfill in West Africa’, *PMNews Nigeria*, 17.09.20 :<<https://www.pmnewsnigeria.com/2017/09/17/lagos-begins-construction-first-engineered-sanitary-landfill-west-africa/>> (accessed 20.12.2018).

3. Training

LASG should try as much as possible to equip its enforcement agencies on how to ensure the effective enforcements of the applicable environmental laws and standards. All project programmes predicted to have a significant negative impact on the environment will require an effective environmental monitoring programme, especially where environmental standards have been set. Therefore, officers of the agencies should be adequately and regularly trained and re-trained for effective enforcement.

4. Effective Environmental Monitoring

Monitoring the environment involves checking, observing and recording information about the environment to prevent it from being destroyed by man's activities especially those involving sophisticated technology. Also, to plan for future exploitation of its resources and to control the

unpleasant effects of environmental mismanagement environmental monitoring instruments should be made available for effective enforcement. This will enhance the collection, analysis and distribution of relevant data to EIA, policy analysis and environmental monitoring units within the States and Local Governments.²¹

5. Inadequate Funding

More funds should be allocated by the Government at all levels to enhance the execution of projects geared towards the improvement of the environment. Lessons from the experiences of the Visionscape showed that they lacked the required infrastructure needed and they were not prepared to effectively rid LS of waste, they eventually had to purchase new trucks in order to meet up with its required output.²²

The initiative which saw the handling of the State's cleaning contract handed over to

Visionscape has been a monumental disaster.²³ A commentator had reportedly observed that before Visionscape, "LAWMA, in the last 10-15 years had been in existence and performing well with the introduction of the PSP and taking waste and managing it properly."²⁴

6. Stiffer Punishments of Environmental Offences

The punishments for violating the laws are too lenient. For example, pursuant to **Section 45 Petroleum Refining Regulations**²⁵ whoever pollutes the environment will pay a fine of only ₦100 or be imprisoned for six months. Obviously, the financial penalty is no longer realistic, and constitutes nil deterrent effect to would be violators. It is recommended that the Federal, State and Local Governments should all reassert a stringent enforcement of environmental laws in Nigeria with the aim of punishing adequately all defaulting firms. Part of such approach will include review of extant legislative provisions, with a view to having new compliance requirements and sanctions that are more attuned to current realities.

The attitude of the court towards the liabilities of those that violate environmental laws are also important in the enforcement of environmental laws. The attitude of courts in their various judgments towards environmental justice should be positive. Just orders should be made to remedy the damages done to the physical environment of private individuals who seek redress in the law court.



²¹ Hakeem Ijaiya, O. T. Joseph, 'Rethinking Environmental Law Enforcement in Nigeria Beijing Law Review', Open Access, 26.11.2014, p.311: <http://file.scirp.org/Html/8-3300306_52770.htm>, (accessed 28.05.2018).

²² Emmanuel Okogba 'Lagos Waste Managers Battle to Save 25,000 Jobs, ₦6 Billion Investment' Vanguard 19.02.2017, <<https://www.vanguardngr.com/2017/02/lagos-waste-managers-battle-save-25000-jobs-n6-billion-investment/>>, (accessed 06.06.2018).

²³ Tony Ademiluyi, 'Akinwunmi Ambode: A Postscript' The Nigeria Voice, 01.05.2019: <<https://www.thenigerianvoice.com/news/27763/akinwunmi-ambode-a-postscript.html>>, (accessed 16.05.2019).

²⁴ Ganiyu Sodamade, a lecturer in the Department of Civil and Environmental Engineering, University of Lagos. See Anthony Akaeze, 'Lagos: Nigeria's Stinking Mega City - Part Two', ICIRNIGERIA, 07.03.2019 : <<https://www.icirigeria.org/lagos-nigerias-stinking-mega-city-part-two/>> (accessed 16.05.2019).

²⁵ Made pursuant to Petroleum Act, Cap. P10 LFN, 2004.

Severe penalties for those found guilty of environmental offences will send out a serious enforcement message.

The SC in *Anambra State Environmental Sanitation Authority v. Ekwem*,²⁶ held that: “The purpose of an award of damages is to compensate the plaintiff for damage injury or loss suffered. The guiding principle is Restitution in Interim, where the Court is called upon to assess that a party which has been clarified by the act which is in issue must be put in the position in which he would have been if he had not suffered the damage for which is in issue must be put in the position he is being compensated.”

Recently, LASG inaugurated the Special Offences (Mobile) Court to summarily deal with growing cases of traffic and environmental abuses in the State with the view to bring sanity and civility in the conduct of residents. The Mobile Court, which will be manned by Magistrates of the State Judiciary, will summarily try cases involving traffic and environmental offenders.²⁷

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Recommendations and Conclusion

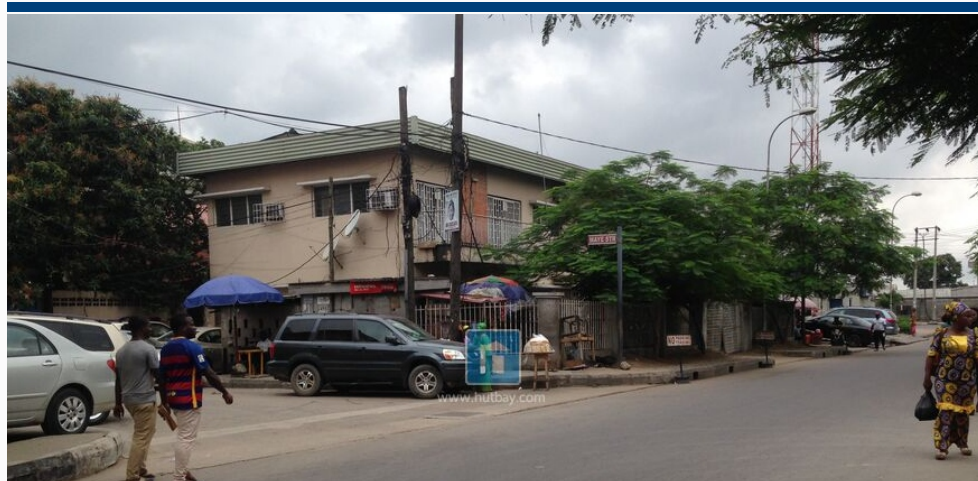
It is pertinent to note that most of these environmental laws are written on paper but yet to be implemented as a result of the challenges and deficiencies of enforcement. All existing environmental laws should be reviewed so as to fill in the existing lacuna and loopholes which operators are currently taking advantages of.²⁸

Funds for the creation of awareness, purchase of equipment and other necessities should be disbursed to the appropriate quarters, where they will be needed for effective environmental management and enforcement of environmental laws.

Proper waste management is a challenge that government authorities are still trying to solve. It is estimated that the country generates about 32 million tonnes of Municipal Solid Waste (MSW) per annum, however only 20-30% is collected, the rest are recklessly left to litter the environment or end up in arbitrary dumpsites

constituting serious health, environmental and infrastructural hazards. Densely populated cities, like LS, generate the most MSW, largely because of the population size and the volume of economic activity. For example, at 0.5kg per capita, Lagos generates more than 10,000tons of waste per day, while the state has a fairly organized system for collecting and disposing MSW, waste collection agencies are still yet to provide complete statewide coverage as random unauthorized dumpsites can still be found across the state.²⁹

The quest for reliable and adequate power supply in Nigeria has brought about a surge of interest in renewable energy generation, particularly from wind, solar, hydro and biomass resources including municipal solid waste. Waste-derived energy raises unique interest because of the magnitude of benefits to environmental protection and socio-economic advancement. The successful operation of Waste-to Energy (WtE) facilities in Nigeria requires continuous supply of solid waste and an enabling environment amongst other factors.³⁰



²⁶ [2009] 13 NWLR (Pt. 1158), 410.

²⁷ Inemesit Udodiong, ‘State Government Launches Mobile Courts Today’, Plus TV, 02.08.2016: <https://www.pulse.ng/news/in-lagos-state-government-launches-mobile-courts-today/2l9bqhe>, (accessed 03.03.2019).

²⁸ Hakeem Ijaiya, O. T. Joseph, ‘Rethinking Environmental Law Enforcement in Nigeria Beijing Law Review’, Open Access, 26.11.2014, p.311: <http://file.scirp.org/Html/8-3300306_52770.htm>, (accessed 28.05.2018).

²⁹ Abayomi Adelodun, ‘Waste-To-Energy: Killing Two Birds with One Stone’, Center for Public Policy Alternative, 09.10.2017 : <http://cpparesearch.org/en-pl/waste-energy-killing-two-birds-one-stone/> (accessed 17.05.2019).

³⁰ ‘Turning Waste Into Energy in Nigeria’, Africanews, 28.11.2018:<<https://www.africanews.com/2018/11/28/turning-waste-into-energy-in-nigeria/>> (accessed 17.05.2019).




The current dumpsites in LS can be converted to recycle centers for interested investors with attractive incentives by the government to ease the pressure on the dumpsites and reduce health implications of the congestion in the sites.

In line with the foregoing, LASG has the responsibility to manage and promote sustainability, it could champion efforts to convert part of the waste into biomass materials to produce electricity for some parts of the State. Through technology, the waste dumpsite could be converted to revenue generation center for the State by turning the place into a massive recycling hub to produce raw materials for other purposes and uses.

For example, **Section 45, National Environmental Health Practice Regulation 2016 (NEHPR)**, provides that there shall be regular disinfestation of every food premises, at least once every six (6) months and the current

certificate of disinfestation duly signed by a licensed environmental health officers shall be displayed at conspicuous location where it can easily be sighted by patrons in the food premises, violators of this provision and required to pay huge amounts of fines. This might be a good law but how many restauranteurs still abide by this in practice?³¹ There is also a bit of discrimination as the inspectors may not enforce this with as much zeal against migrant or roadside ‘Mama Put’ that blissfully cooks away and is often a greater hazard to the public.

In a nutshell, the LASG should pay more attention in projects that will improve and impact positively and effectively in the waste management in LS. Implementation is the ‘nitty-gritty’ of environmental regulation and every bit as important as its provisions. For this reason, it should be given considerable emphasis by environmental agencies 

“LASG SHOULD PAY MORE ATTENTION IN PROJECTS THAT WILL IMPROVE AND IMPACT POSITIVELY AND EFFECTIVELY IN THE WASTE MANAGEMENT”

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³¹ Omovefe Oghotomo, “All You Can Eat”: - Legal Regulatory Compliance Requirements for Restaurant Operators in Nigeria”, LeLaw Thought Leadership, 08.2018: < http://lelawlegal.com/pdf/All_you_can_Eat_Omovefe_.pdf > (accessed 17.05.2019).