

ORGAN HARVESTING: A CRITICAL REVIEW OF NIGERIAN LAW AND LESSONS FROM INTERNATIONAL INSTRUMENTS*

Abstract

Organ Harvesting has become a crime of international concern, being among the crimes against humanity (CAH). Thus, Nigeria as a member of the International Community or the Committee of Nations cannot turn a blind eye to this nefarious act. This work critically reviewed Nigerian legislative response through statutory enactments flowing from international legal instruments such as: the United Nations Palermo Protocol, The ILO Convention, the Council of Europe convention on action against trafficking in human beings 2002, European Union Council framework decision on combating trafficking in human beings by the European union, among other international instruments to curb this menace. The trafficking in organ cases namely: the Gurgoon Trafficking Network, India, The Netcare Trafficking Network, South Africa, The Medicus Trafficking Network, Kosovo, The Rosenbaun Trafficking Network, USA. The recent alleged trafficking for purpose of Organ Harvesting of a homeless Nigerian child named David Nwamini Ukpo, to the United Kingdom by Senator Ike Ekweremadu and his wife, Beatrice Nwanneka Ekweremadu, further sparked global attention. The crime has ignited international concern and response through various legal instruments, to the effect. In Nigeria, there is a legislative response to this through various legislations through the promulgation of the national Act;¹ i.e The Trafficking in Persons (Prohibition) Enforcement And Administration Act 2015², which established the national agency for the prohibition of trafficking in persons (NAPTIP), as the lead agency in the enforcement and prosecution of perpetrators of organ harvesting and related matters thereto. This study has brought to the fore the need for spirited efforts to nip this heinous crime against humanity in bud, in fulfilment of Nigeria's obligation as a responsible member state of the committee of nations.

Keywords: Organ Harvesting, Organ Donation, Organ Transplant, Trading on Organs.

1. Introduction

Organ harvesting means a 'surgical procedure that removes organs or tissues for use, typically for organ transplantation'³. Organ donation and transplantation⁴ is removing an organ from one person (the donor) and surgically placing it in another (the recipient) whose organ had failed. Organs that can be donated include the liver, kidney, pancreas and heart⁵. The focal point of this paper is to critically review Nigerian law relating to organ harvesting or transplantation as well as lessons from international instruments in that regard, such as: the United Nations Palermo Protocol which is intended to prevent, suppress and punish trafficking in human beings, especially women and children, supplementing the United Nations Convention against transnational organized crimes and its protocols,⁶ the international labour organization (ILO) Convention, the council of Europe convention on action against trafficking in human organs 2002, European union council framework decision on combating trafficking in human beings. This crime has become a subject of concern to the international community as most states in the comity of nations have enacted domestic instruments within their national sovereign boundaries to stem this raging tide. Nigeria is not left out of this fight to curb this menace – as several legislative instruments and as well as administrative machinery, are in place in this regard as would be discussed in this work. The crime of organ harvesting came to the glare of public discourse recently following the arrest, detention and ongoing prosecution of Former Deputy Senate President, Senator Ike Ekweremadu and his wife, Beatrice Nwanneka Ekweremadu suspected conspiracy traffic a minor named, David Nwamini Ukpo with a view to harvesting his organs, as x-rayed in details in this paper.

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¹ Act no. 8, 2014. The act is the principal legislative instrument for the regulation, development and management of a national health system and set standards for rendering health services in the federation; and for related matters.

² Act, no. 4, 2015.

³ Wikipedia 'Organ Procurement', available at www.en.wikipedia.org. accessed on 29/7/2022 at 11:42am.

⁴ Cleveland Clinic, 'Organ Donation and Transplantation', available at www.my.clevelandcinc.org, accessed on 29/7/2022 at 11:49am.

⁵ Ibid at n4

⁶ Palermo Protocol, available at [45](http://www.home.affiras, etc. Europe. E.U. The Palermo protocol is supplemental to the United Nations convention against transnational organized crime and protocols being by the European Union etc. this work will critically bring to the fore Nigerian legislative response to this crime of international.</p></div><div data-bbox=)

2. Conceptual Definitions

Organ Harvesting:

The word organ is a part of human body that has or that performs a specific purpose like heart, the brain, the liver, the lungs, the kidney⁷ Other organs include sense organs like nose, eyes and ear, sexual organs or reproductive organs, the above organs may be internal or external as case may be. It is interesting to note that from the wording of the Oxford Dictionary, the organ parts of the body are vital parts of body and are fundamental in the overall survival of the individual life including animals. The removal of such organ or the event of death of such organs is always a serious issue in the person's existence. When the organs are harvested meaning that they are cut off or removed against the consent of the individual or without due process, the act of such harvesting or removal is unlawful and offence both in national legislations and under some international instruments.

Organ Donation:

To donate means to voluntarily give out something by someone.⁸ The person making the donation must be the owner of what is donated and such action cannot be performed by an agent. The important point in organ donation is that the person donating has full rights and powers over what he is donating and he is aware of what he is doing and consents to the donation. In donation of organs, the donor must also comply with the medical procedure and guidelines stipulated for regulating the process in the jurisdiction where donation is carried out, if not it will void and a nullity.

Trading in Organs

To trade in human organ or parts means to engage in the buying and selling of vital human organs or parts. It means commercialization of such organs such that they become like items of sale and for exchange between persons. Trading in organs is part and parcel of offence of trafficking in persons prohibited in Nigeria by several legislations both at the center and at level of states. In other jurisdictions, there are laws or legislations domestically put in place to check the menace and at the international level, there are conventions and instruments prohibiting such acts. Trading in organs is usually a secret business and it is usually in form of a syndicate or network.

Organ Transplant

This is a medical procedure carried out by a medical expert or surgeon where an organ or part is taken from a human being or a particular animal and put in another person or another animal. For purposes of this paper, our concern is organ transplant from one person to another person. Where a kidney or heart or a reproductive organ of 'Mr A' is taken from him and planted on 'Mr B', a successful organ transplant have occurred. However, our concern here is the legality of whatever has been done. If the transplant is pursuant to a donation voluntarily made by the donor to the donee with all conditions for such donation met, such transplant is legal and valid. However, if the transplant is short of the required conditions for such transplant for example, the transplant is induced, is under a deceit or promise of reward and the donee 'so called' does not know the consequences of the donation for example that it will lead to his death, such transplant or purported transplant is unlawful and is treated as a crime of organ harvesting.

3. Legal and Administrative Frameworks against Organ Harvesting in Nigeria

The National Health Act⁹ is the principal legislative instrument for the regulation, development and management of health system and standards setting for the rendering of health services in Nigeria. Section 48(1)¹⁰ of the Act provides that: '...a person shall not remove tissue ...from the body of another living person for any purpose except;

- a. With the informed consent of the person from whom the tissue ...is removed, granted in prescribed manner'.
- b. The Act¹¹ criminalizes a contravention of the foregoing provisions¹².
- c. Another legislative instrument relevant to his study is the Trafficking In Person (Prohibition) Enforcement and Administration Act¹³, which criminalized procurement of recruitment for organ harvesting, ¹⁴ by providing thus:

⁷ Oxford advanced learners dictionary int. student edu. New 8th edn.

⁸ ibid

⁹ Ibid n1

¹⁰ Ibid n1

¹¹ Ibid n1

¹²S.48.Sub -5(3) (a) ibid, provides for a fine of ₦1,000,000.00 or imprisonment of not less than two years of both fine and imprisonment.

Any person who –

- a. Through force, deception threat, debt bondage or any form of coercion.
 - i. abuses a position of power or situation of dominance or authority arising from a given circumstances: or
 - ii. abuses a vulnerable situation; or
- b. Through the giving or receiving of payment or benefit in order to induce or obtain the consent of a person directly or through another person who has control over him; enlists, transports, delivers, accommodates or takes in another person for the purpose of removing the person's organs, commits an offence and is liable on conviction to imprisonment for a term of not less than 7 years and a fine of not less than ₦5,000,000.00.
- a. The Act¹⁵ further provides to the pursuant to subsection (1) of the section that, a person who procures or offers any person, assists or is involved in any way in the removal of human organs; or
- b. Buy or steal human organs, commits an offence and is liable on conviction to imprisonment for a term of not less than 7 years or to a fine of not less than ₦5,000,000.00.
- c. The Act¹⁶ further makes provisions for punishment for procuring any person under the age of 18 years for the purpose of removing the person's organs, the person commits an offence and is liable on conviction to imprisonment for a term of not less than 7 years and a fine of not less than ₦5,000,000.00.
- d. The Act¹⁷ established the National Agency for the Prohibition of Trafficking In Persons (NAPTIP) as the lead agency in the Enforcement and Administration of the provision of the Act; and also provides for its functions as follows: -
 - i. Enforcement and administration of the provisions
 - ii. Co-ordination and enforcement of all other laws on trafficking in persons and related offences;
 - iii. Adoption of effective measures for the prevention and eradication of trafficking in persons and related offences;
 - iv. Establishment of co-ordinate preventive, regulatory and investigatory machinery geared towards the eradication of trafficking in persons;
 - v. Investigation of all cases of trafficking in persons including forced labour, child labour and other forms exploitation, slavery like activities, bonded labour, removal of organs¹⁸, illegal smuggling of migrants, sale and purchase of persons; among other functions.

4. Efforts of NAPTIP in containing Organ Harvesting in Nigeria

A report by the international center for investigative reporting (ICIR)¹⁹, reads: '...NAPTIP was fighting all forms of human trafficking in the country, including the rising crime of human organ trading'. The report further stated that 'NAPTIP has decided to begin full investigation because most of the times when other laws enforcement agencies go out, they will come to tell us that the suspected organ harvesting is a ritual murder'.²⁰ What is important to be noted is that NAPTIP is a key player and major stakeholder in the war against Trafficking in persons in Nigeria and has worked in synergy with National Security Agencies and other organizations to curb the menace in Nigeria.

Trafficking of human beings for the purpose of Organ Removal²¹ in North and West Africa has projected Nigeria as a country of origin, transit and destination, for trafficking in persons for organ removal. This is driven largely by the global shortage of organs for ethical transplant. While organ trafficking exists in all regions of the

¹³ Ibid n2. S. 2 of the Act established the national agency for the prohibition of trafficking in persons.(NAPTIP), which is the lead agency of government in the enforcement, arrest and prosecution of violations of all laws on human trafficking organ harvesting in Nigeria.

¹⁴ S. 20 of the Act. Ibid n2

¹⁵ Ibid, S. 20, Sub-5(2) (a)-(b). this provision could be said to encompass a penal sanctions for both accessories before and after the fact of organ harvesting. This is view of the fact that the crime of Organ Harvesting is an organized crime and mostly perpetuated by syndicates; and is in most cases, a Transborder in nature.

¹⁶ Ibid s, 20, sub- 5(a) –(b). this provision could be said to encompass a penal sanctions for both accessories before and after the fact of organ harvesting. This is view of the fact that the crime of organ harvesting is an organized crime and mostly perpetuated by syndicates; and is in most cases, a Transborder in nature.

¹⁷ Ibid n2 SS.2 and 5 of the Act, established NAPTIP and provides for its functions.

¹⁸ Underlining mine for emphasis. This is in view of the fact that the underlined item is in view of the fact that the underlined item is the crux of this study.

¹⁹2012-2022 titles 'NAPTIP to investigate organ harvesting being disguised as ritual murders; available at www.icrinigeria.org; accessed on 1/8/2022 at 3:20pm.

²⁰ Ibid. this was a statement from the former director- general of NAPTIP, hulisie okah-donli made available to the news agency at Nigeria as contained in the report.

²¹ International police (Interpol) report 2021 titled 'trafficking of human beings for the purpose of organ removal in north and west Africa' being a paper delivered at the 25th national stakeholders consultative forum on human trafficking and presentation of national action plan on human trafficking and other policy documents held at the Sheraton hotel, Abuja on 29/4/2022 available at www.natip.gov.ng accessed on 18/8/2022 at 3:39pm.

world, it is of particular concern in north and west Africa, where impoverished communities and displaced populations are at greater risk of exploitation, the big Western Nations see poor African states as a viable source for organ products. The Director-General (D-G) of NAPTIP, Dr. Fatima Waziri-Azi reiterated the determination of NAPTIP to continue to tackle human trafficking in the country through the strict implementation of strategic thrusts and ensuring that traffickers are effectively prosecuted.²² The NAPTIP helmsman²³ disclosed that as part of the efforts to address the scourge of human trafficking, the agency has taken steps in its partnership base with the collaboration with Facebook in order to expose, sensitize and swiftly tackle any emerging incidence of human trafficking online.

Between October and December 2021, Nigeria signed bilateral agreements²⁴ to prevent, suppress and punish, trafficking in persons, especially women and children, with the republic of Irony Coast, Burkina Faso and a 'Memorandum of Understanding' with the Republic of Niger. Nigeria signed another bilateral agreement with the Gambia in June, 2022 and finalizing another with South Africa²⁵. NAPTIP has recorded 510 convictions and counting for the year 2022 and with 261 ongoing cases in various courts across the country, and II ongoing mutual legal assistance cases –of which out of the II, two cases are currently being prosecuted in court (Lagos and Benin)²⁶. NAPTIP²⁷ has been able to rescue 17,636 victims of Human Trafficking, 394 outside the country in the year 2022.

5. Organ Harvesting: A Critical Review Of Nigeria Law And Lessons From International Instruments

As highlighted hereinabove, Nigeria has made a very swift and decisive legislative response through the enactment of the following statues namely: the National Health Act²⁸ and the Trafficking in Person (Prohibition) Enforcement and Administration Act²⁹ which Edo State Prohibition of Human Trafficking and Prostitution Law 2003 underscore the seriousness of Nigeria's legislative response to this crime of international concern-being among the crimes against humanity (CAH) recognized as a part of international crime or crimes of international concern. There is in place an enforcement and administration body to ensure that perpetrators of this crime are brought to justice known as NAPTIP³⁰ as the lead enforcement agency in this regard. Undoubtedly, NAPTIP has risen up to his mandate of containing this crime of global attention by investigating suggested challenge, prosecution and securing their convictions. Over 13 persons were convicted in the year 2022 alone,³¹ while a total of 510 persons have been sent behind the bar and 261 human trafficking/ organ harvesting and related offences cases are pending in various courts³², with 17,636 victims of the crime rescued³³. It is hoped that the criminalization and penalization of the act of the crime harvesting infractions vis-à-vis the convictions of culprits will serve as a deterrent to other person or persons that may wish to indulge in such illicit act-as it will make it unattractive in the most nearest future.

6. Lessons from International Instruments

At the international fronts, the following instruments serve as compass in guiding Nigeria's legislative response to the menace of organ harvesting or transplant namely: (a) The United Nations Palermo protocol; (b) The ILO Convention; (c) The Council of Europe Convention on Action Against Trafficking in Human Organs 2002, EU³⁴ Council Framework Decision on combating Trafficking In Human Beings by the European Union.

The following international instruments shall be highlighted in brief seriatim; as a launch pad for a discussion on the lessons drawn therefrom at the domestic front.

²² Ibid Dr. Fatima Waziri-Azi is the current Director –General of NAPTIP. She took over from her predecessor, jlie okah-donli. N19.

²³ Ibid

²⁴ Ibid this was the statement from the NAPTIP Chairperson, Dr. Fatima Waziri ___ Azi, n19

²⁵ Ibid, n19

²⁶ NAPTIP 'Human Trafficking is a challenge of Extraordinary magnitude that requires joint efforts' being a paper delivered by Prof. Yemi Osibanjo (SAN), Vice President, Federal Republic of Nigeria, through Mr. Mr. Ade Ipaye, at the 25th National stakeholders consultative forum on human trafficking and presentation on national action plan on Human trafficking and other policy document held at the Sheraton Hotel, Abuja on 29/4/2022 available at www.naptip.gov.ng accessed on 1/8/2022 at 4:16pm.

²⁷ Ibid, n19.

²⁸ Ibid, n1 section 48(10 of the Act prohibits Organ harvesting without the 'informed consent' of the Donor.

²⁹ Ibid n2. Section 20 of the Act enalize organ harvesting procedural contravention with a ail term of not less than 7 years of fine of ₦5,000,000.00.

³⁰ S. of the Act, ibid, n2 established NAPTIP while s. 5 provided for its function as highlighted hereinbefore.

³¹ Ibid, n24.

³² Ibid, n24

³³ Ibid, n25

³⁴ E.U is the abbreviation for European Union.

a. The United Nations Palermo Protocol

The United Nations Convention against transnational organized crime and the protocols thereto called the U.N Palermo Protocol is the Principal U.N International instrument in the fight against Organ Harvesting and Human Trafficking. This international instrument was adopted by the general assembly resolution 55/25 of 15 November 2000³⁵, and entered into force on the 29th September, 2003. Countries must become parties to the convention itself before they can become parties to any of the protocols³⁶. Nigeria appended signature as a state party to the U.N Palermo Protocol on the 13th December, 2000³⁷ and ratified same on 28th June 2001.³⁸ The protocol was signed at the Palazzo Di Giustizia in Palermo, Italy and thereafter at United Nations Headquarters in New York.³⁹

b. The International Labour Organization (ILO) Convention

The ILO Convention was adopted in 1919⁴⁰ and covers hours of work, the most recent convention, adopted in 2019, covers violence and harassment in the work place. The ILO convention covers a wide area of social and labour issues including relations, employment policy, social dialogue, social security and other issues⁴¹. The ILO convention shall be binding only upon those members of the ILO whose ratification have been registered with the Director-General.⁴² The ILO made fundamental provision prohibiting trafficking through forced labour, child bonding, bonding in employment, slavery and organ harvesting through prostitution.

c. The council of Europe convention on action Against Trafficking in Human Organs 2002 and E.U Council framework Decision on combating Trafficking in Human Organs by the European Union

This international instrument was opened as a treaty at War Saw on 16th May, 2005 and came into force on 1st February, 2008 following ratifications by 8 member states and 2 non-member states.⁴³ The convention is a comprehensive treaty mainly focused on the protection of victims of trafficking and the safeguard of their rights. It also aims at preventing trafficking as well as prosecuting the traffickers⁴⁴. The convention applies to all forms of trafficking; whether national, or transnational, whether or not related to organized crime and whenever the victim, women men or children and whether the form of exploitation, sexual exploitation, forced labour or services etc⁴⁵. The convention⁴⁶ has as its purposes,⁴⁷

- a. To prevent and combat the trafficking in human organs by providing for the criminalization of certain acts;
- b. To protect the rights of victims of the offences established in accordance with this convention;
- c. To facilitate co-operation at national and international level as an action against the trafficking in human organs;
- d. The convention also makes provisions against illicit removal of human organs by providing as follows:⁴⁸

Each party shall take the necessary legislative and other measure to establish as a serious offence under its domestic law, when committed intentionally, the removal of human organs from living or deceased donors;

- i. Where the removal is performed without the free, informed and specific consent of the living or deceased donor, or, in the case of the deceased donor, without the removal being authorized under its domestic law;
- ii. Where, in exchange for the removal of organs, the living donor, or a third party, has been offered or has received a financial gain or comparable advantage;
- iii. Where in exchange for the removal of organs from a deceased donor, a third has been offered or has received a financial gain or comparable advantage.

These international instruments act as mirror and call to action for Nigeria, on the need to emphasise necessary legislative measures to combat the menace of organ harvesting, being a crime of international concern. This

³⁵ United Nation Office on Drugs and crime (UNODC) 'United Nations Convention Against Transnational organized crime and the Protocols thereto', available at www.unodc.org, accessed on 1/8/2022 at 1:50p.

³⁶ Ibid n33. The convention is further supplemented by three protocols to prevent, suppress and punish trafficking in persons, especially women and children, the protocol against the smuggling of migrants by land, sea and air, and the protocol against the illicit manufacturing of trafficking in firearms, their parts and components and ammunition.

³⁷ Ibid n.33.

³⁸ Ibid n.33

³⁹ Ibid n.33

⁴⁰Wikipedia 'list of international labour organization conventions', available at www.wikipedia.org , accessed on 1/8/2022 at 4:51 pm.

⁴¹ ILO 'ILO Convention', available at www.ilo.org ,accessed on 1/8/2022 at 5:02pm.

⁴² Art 8, *ibid*, n38.

⁴³ Coe, 'Treaty office', available at www.coe.int accessed on 2/8/2022 at 12:45am.

⁴⁴ *Ibid* n.41.

⁴⁵ *Ibid* n.41

⁴⁶ *Ibid* n.41

⁴⁷ Article 1, *ibid* n.41.

⁴⁸ *Ibid* n.1

culminated in the enactments of the National Health Act⁴⁹ and the Trafficking in Persons (Prohibition) Enforcement Act⁵⁰ that gave birth to NAPTIP.

7. The Trending Case of Sonia Ekweremadu and Paradigm of Organ Harvesting as Crime of International Concern

The issue of Organ Harvesting was further brought to limelight in June, 2022, following the arrest and remand of Senator Ike Ekweremadu and his wife, Mrs. Beatrice Nwanneka in the United Kingdom (UK) on a charge of conspiracy and commission of Organ Harvesting. The London metropolitan police⁵¹ wrote Ike Ekweremadu, 60(12.05.62) and the commission of Nigeria is charged with conspiracy to arrange/ facilitate travel of another person with a view to exploitation, namely organ harvesting'. In a related development, the metropolitan police further stated that '...Beatrice Nwanneka Ekweremadu, 55(10.9.66) of Nigeria is charged with conspiracy to arrange/ facilitate the travel of another person with a view to exploitation, namely 'organ harvesting'. Both were remanded in custody on the order of the UK Bridge Magistrates Court pursuant to the Modern Slavery Act.⁵² The Act provides that: ⁵³ A person commits an offence if the person arranges or facilitates the travel of another person ('V') with a view to V exploit or where a person arranges or facilitates 'V's travel with a view to V being exploited only if:-

- a. The person intends to exploit V's part (in any part of the world) during or after the travel, or
- b. The person knows or ought to know that another person is likely to exploit V (in any part of the world) during or after the travel'.

The Ekweremadu's were transferred to the central criminal court by the UK Bridge Magistrate Court,⁵⁴ while the defendants are to remain in custody till the next adjourned date. None the less, the wife was granted bail on condition that she will not leave the shores of UK. The Senator Ike Ekweremadu's case has brought to the fore global attention to organ harvesting and the seriousness with which the international community attach to this heinous crime. On 4th August, 2022 the case came up and was further adjourned to the 31st day of October, 2022; while they are to remain in custody till the next date sometimes in May 2023. Though the commentators in Nigeria tried to defend the defendants on grounds that the victim Nwamini being 21 years favoured the defendants, it appears the UK Law does not attach much value to the age of the victim but is of concern on whether the procedure under the UK Law for Organ donation was followed or not. It is immaterial the victim alleged donor is an adult or minor, what is of utmost consideration is whether the laid down procedure was followed. Failure to follow the procedure invalidates the donation or purported planned donation only time and evidence before the UK Court will show whether the Ekweremadu's did the needful or not.

8. Conclusion and Recommendations

This work critically reviewed Organ Harvesting, as a crime of the international concern. It did so by looking at the Nigerian legislative response to same; as well as lessons drawn from international instruments. The case of Ike Ekweremadu and his wife over the transportation of a homeless child named David Nwamini Ukpo to the UK for purpose of Organ Harvesting was also highlighted- as a case study to the heinous nature of this crime and the seriousness which the international community attach the crime. Nigeria has also put in place legislative and administrative machineries in place like NAPTIP – to nip this ugly trend in the bud in the country and there is no gain repeating the fact that NAPTIP has done very much and so well. It is recommended that more stringent penalty(ies) be put in place in domestic legislations for persons convicted of the crime of Organ Harvesting. This will serve as deterrence to persons that might tend to indulge in such illicit act. We recommend also that the NAPTIP Act should be enforced and prosecutors equipped with modern facilities.

⁴⁹ Ibid n.2

⁵⁰ Ibid n.2

⁵¹ Channels tv. Uk Police Arrest Ike Ekweremadu, Wife for Organ Harvesting' available at www.channelstv.com ,accessed on 3/8/2022 at 2:50am.

⁵² UK Public General 2015C, available at www.legislation.gov.uk ,accessed on 3/8/2022 at 3:10pm, 2 and 5 the Act prohibits Human Trafficking/Organ Harvesting, while s.5 of the Act provides for penalties for organ harvesting.

⁵³ S.2 sub.ss (1) (4) of the Act, Ibid, n 50

⁵⁴ Newwire Nigeria 'Ike Ekweremadu's case transferred to the Central Criminal Court and adjourned to august 4', available at www.newswireng.com , accessed on 3/8/2022 at 4:15pm. The order for transfer was made on 7/7.2022 by the Uxbridge Magistrate Court.