STANDING TO SUE: A REVIEW OF THE DOCTRINE OF LOCUS STANDI IN NIGERIAN JURISPRUDENCE

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Abstract / Introduction

Locus standi literally means *"a place of standing"*. It is the right to be heard in court or other proceeding[1]. The two words are used interchangeably with terms like *"standing"* or *"title to sue"*. The term simply means the legal capacity or standing to institute, undertake or initiate a suit or action in a court of law. In order to acquire that capacity or standing, a person must show interest that is sufficient in the subject matter of *the intended suit to enable him sue.* The standing to sue (locus standi) is a condition precedent to the determination of a case on the merits. In applying the

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Osborn's Concise Law Dictionary 9th edition at page 239. Mohammad CM. in *Usinan Mohain/ned* v. Attorney General Kaduna Slate and another (19X1) 1NCLR 117 at page 127 describes the term as '"sufficient interest or an interest which is peculiar to the plaintiff, not one which he shares in common with general members of the public" See the learned authors of Aihe and Oluyade: *Cases and Materials on Constitutional Law in Nigeria,* page 200. See The observation of Obaseki JSC in Adesanya v. *President Federal Repuhlic ofNigerla and another* (198 1) 2 NCLR 35 X. Nnamdi Aduba in an article".-! *Critical Appraisal of the Judicial Interpretation oj the Princi/ile of Locus S/timli in Nigeria"* has compared locus standi to a "technical knockout" in boxing in the sense that once a party is declared as not having a locus standi the matter is over. Courts are no longer required to go into the merits or demerits of the ease. See also the statement of *Oputa JSC in Attorney (ieiieral Kadn/ia Stale* r, *Ilu.tsun IIVH5J 2* NWLR (parts X) 4X3 at 523. In this case the eminent jurist cites the learned authors of Earl Jowitt in *Dictionary of English La\r* where (at 1110 page) it was observed: *losay a person lias no locus staiuli means tlial he has no right to (tpar inn proceeding*

doctrine, a court of law focuses on the party who seeks to get his complaint before the court, and not on the issues he wishes to have adjudicated[2].

To achieve the status of locus standi the claim of the plaintiff must reveal a legal or justifiable right, sufficient or special interest adversely affected and a justifiable cause of action[3]. The doctrine had its origin from the *actio popular is* in Roman law in which it was open to any free citizen of the city of Rome to sue for the infringement of a public or private wrong which he has suffered. It is applied in many jurisdictions- United States of America, United Kingdom, France and commonwealth jurisdictions including Nigeria. This article will examine the application and working of the locus standi or the *sufficient interest* rule in Nigeria.

The paper will examine the importance of the doctrine in Nigerian jurisprudence,, the original or rigid application of the doctrine by the courts, the modern, purposive or liberal applications of the doctrine, and the application of the rule in the Constitution of the Federal Republic of Nigeria.

Courts of law in Nigeria have at various times interpreted the doctrine applying a restrictive/special interest test or the purposive liberal test. This article will through case law examine the interpretation of the standing or special interest rule in Nigerian jurisprudence, the rationale of the doctrine, its constitutional importance, the relationship between locus standi and jurisdiction of the court, and the modern judicial thinking and interpretation of *"the standing rule"* will receive the attention of this paper. The article will address issues of the apparent confusion and lack of uniformity in the criteria used for the granting of locus standi.

Finally, we will examine the attitude and the performance of Nigerian courts in specific matters in which locus standi issues were raised, and proffer solutions aimed at liberalizing the jurisdiction of the courts in locus standi matters.

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[2] Viroio j v, *Azubnike* (2013)4 NWLR (Part 1343) 197. Owotoye JCAat page 211 of this authority says the mere fact that an act of the executive or legislature is unconstitutional without any allegation of infraction of or its adverse effect on one's civil rights and obligation poses no question to be settled between the parties in court.

[3] *to Sue*

1.0 Rationale of the Doctrine

2.0

1.1 In world-wide jurisdictions, the doctrine of locus standi was developed to protect the court from persons who have no stake in the subject matter of the litigation they wish to pursue. Over the years, the judiciary had thrown its doors wide open to litigants, yet the same doors had been shut against professional litigants, meddlesome interlopers and busy bodies who have no stake in the subject matter of the action[4].

In the area of public interest litigation, a onetime [5]Attorney General of England had argued that it would be reasonable to multiply suits by giving every man a separate v.t of action for what dignifies him in common with the rest of - fellow subjects[6].

The Supreme Court of Canada in ***Smith v.***

Attorney General for Ontario has stated that a liberalization of -- restriction on individual standing rule "would lead to grave convenience[7]. On the need to restrict the grant of locus to ~.j:ants especially in public interest suits, the Court of Appeal England) in ***Rex. Inland Revenues Commission ex-parte "National Federation of Self-Employed and Small Business*** argued *that it would:*

> *"Prevent the time of the court being wasted by busy-bodies with misguided or trivial complaints of administrative error, and to remove the uncertainty public officers and authorities might entertain in as to whether they could safely proceed wit administrative action when proceedings for judicial review of it were actually pending even though misconceived"*

Nnamani, eminent Nigerian jurist, does not subscribe to the idea of liberalizing the restriction on locus standi for the tailgating public, for in his words, no *one would want busy bodies sprout all around us*

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[4] Sir William Blackstonc in *Black stones Coiiiincniaries' 11* edition. Book 4, page I 06.

[5] 1924) SCR 33 1 at354. 5. (19X2) AC 617.
the restriction of the *rule.*

[6] (1982)AC61.

[7] Sec the concurring judgment of Nnamani JSC in *I'am'hinmi I'.Akilu* (1987) 4 NWLR (Part 67) 797. Obascki JSC' also expressed a similar view in his judgment in the same ease.

Restrictive Application of Locus Standi Doctrine

2.1 The restrictive or narrow interpretation is the earliest approach in the application of the doctrine of locus standi. The locus classicus on the restrictive or narrow application of the doctrine in Nigeria is the Supreme Court decision in the case of ***Abraham Adesanya v. The President of the Federal Republic of Nigeria*** Under the restrictive interpretation and application of the doctrine, a person who does not have sufficient interest nor has suffered a specific injury in respect of a matter has no locus to sue or obtain remedy in court because that person's right has not been violated or contravened as provided by the Nigerian Constitution.

Under the narrow or restrictive application of the doctrine, a person who shares a common interest with members of the public does not have locus standi to sue or initiate an action[8] To have a standing to sue, he must have suffered an injury or disadvantage over and above other members of the public.

2.2 In ***Abraham Adesanya v. The President Federal Republic of Nigeria and*** **another[9].** Abraham Adesanya, a serving Senator of the Federal Republic of Nigeria, had on the floor of the Senate opposed the appointment of one Justice Ovie-Whisky as Chairman of the Federal Electoral Commission (FEDECO). The opposition by the Senator did not however stop the Senate from confirming the appointment. The Senator approached the court to challenge the appointment. The locus standi of the Senator to institute the action was challenged by the Federal Government. The Supreme Court held that the Senator had no locus standi to challenge Justice Ovie Whisky's appointment as chairman of the electoral commission. The decision of the supreme Court on the issue although controversial was unanimous.

Fatayi Williams CJN (as he then was), delivering the lead judgment, was of the view that, although certain matters like the appointment of persons into key political offices may sometimes generate controversies, "such controversies are however not .suited for resolution by the courts since the matters have been entrusted by the Constitution to the other two branches of government - the Executive and the Legislature for deliberation and eventual resolution. Some four years after the controversial decision in ***Abraham Adasanya,*** the Supreme Court also maintained its rigid position on the grant of locus standi in the case ***of Abimbola Akinteitri and***

[8] Sec further the U.S Supreme Court decision in *Baker Can-* (369 US 180. 284) which justified

[9] (1981) *2* NCLR 358 Sec also the earlier decided case of *Olawoyin v. Attorney General Northern Nigeria* (1961) 2 SCNLR 5 See in particular the remarks of Bello J.S.C, at pagc39 and the remarks of Nnamani J.S.C. at page *55* of the judgement in Abraham Adesanya's case.

Ife[10]. In this case, owr *aggrieved students of the University oflfe, .eIfe, who were rusticated by the authorities for alleged -lamination malpractice approached the court to restrain the '.-.university authorities from withholding their end of 'session examination results.* The Supreme Court held that the matter was of an academic nature and could not dictate to the university authorities when and when not to pass their students in examinations. The students were therefore denied the locus to sue or pursue the matter.

2.4 One of the earlier foreign authorities on the rigid or narrow application of the doctrine was ***Arthur Yates and Company Property Ltd v. The Vegetable Seeds Committee".*** In this case Latham CJ. Said:

> *"The enactment of a law cannot of itself give any cause of action to a person who is injured by the application of the law. All members of the community are subject to the risk of a law being made, altered or replaced to their detriment, and they have no remedy for any injury consequentially suffered unless the law provides for some form of compensation. This is obviously the case when a law is valid If the pretended law is invalid it is still the case that there is no remedy in respect of the mere making of the supposed law"*

In the earlier cited authority of ***Usmart Mohammed v, Attorney-General of Kaduna State,*** the plaintiff had complained about an inconsistency between a state local government law and the Constitution of the Federal Government of Nigeria, the unlawful extension of the term of office of members of the local government council and the usurpation of the executive functions of the State Government by the legislature. He contended that his right as a registered voter of Kaduna State, willing and potentially qualified to contest election into the local government council in the State as provided by the Constitution was thereby threatened.

Denying the plaintiff the locus standi to prosecute the action, the court posed for itself two questions and answered same as follows.. *"The plaintiff is not the Governor of Kaduna State. The Governor has not complained about the usurpation of his executive powers by the legislature. "*

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[10] (I985) I NWLR (part 1)68. Sec the earlier decided English authority in Thornc V. *University of London* (1966) *2* 0 B237 where the Queen's Bench Division of the High Court in England reasoned that it could not act as a court of appeal from the decision of university examiners. Here an aggrieved Law student was denied locus standi to sue and 'compel the University authorities to award him a higher grade justified by his performance at the examination.

2.6 The same rigid interpretation was given on the issue of the location of the headquarters of a local government council. In ***Damisha and 2 ors v. The Speaker Benue State House of Assembl[11],*** three rate payers of the new logo Local Government Council of Benue State sued the State House of Assembly, seeking a declaration that the location of Ugba as the headquarter of Logo Local Government was in bad faith, unconstitutional and therefore null and void and that Abeda ought to be the headquarter. Describing the plaintiffs as busy bodies with no locus standi to institute the action, the court (Eri J.) made the following remarks:

> "*...while I appreciate that they have interest in the question where the headquarter of their new local government was located as individuals, this interest cannot be over and above the interest of the generality of Gambetiev people neither could then-interest be an interest on behalf of the people. I cannot also see how the interest of the plaintiffs or their rights and obligation are affected over and above a matter exclusively provided for their community. Undoubtedly any interest about the headquarters of Logo Local Government is ever shared by the general public of that community and not the plaintiffs alone. I see their position in the present suit as no better than an action instituted by a busybody. Plaintiffs as individuals have no locus standi to bring the action*[12]

2.7 In ***Inyangukwo and ors v. Akpan and ors[13],*** the court denied locus to registered voters in Cross River State who was eligible to vote in the state House of Assembly election. They sought a declaration that the first defendant who was the chairman of Ini Local Government Council was not qualified to contest the House of Assembly elections and that as chairman of the local government he was being paid salaries as a civil servant and using government vehicles for his election campaign, this they argued further disqualified him from contesting the election. The court was of the view that the plaintiffs who were registered voters from the constituency have not shown how the action of the chairman violated their civil rights and obligations. They have also not shown sufficient justifiable interest to give them locus standi. Nigerian courts have also maintained a rigid and inflexible interpretation of locus standi in cases *involving the challenge of eligibility of persons to certain appointments or offices.* In ***Akure v. National Party of Nigeria*** *(NPN)* ***and*** 0rs[14]the plaintiff, a tax payer and a member of the defunct National Party of Nigeria in his suit, challenged the renomination of one Mr. Aper Aku to contest as Governor of Benue State on the platform of the NPN on the ground that he was downright corrupt. The court held that he lacked sufficient interest to -institute the action for he had not claimed that he

[11] (1945)7RCLR37AT37
[12] (19X3) 4 NCLR 625 ai 633.

[13] (I9X3)4NCLR 625.
[14] (1984)5 NCLK447.

aspired to the position of governor and that the re-nominated person was a stumbling block on his way Standing to sue was also denied a plaintiff tax payer and registered voter who asked that a member of his community be disqualified to stand election as a senator on the ground that he had been found guilty in the past of fraudulent practices. The court held that no special rights of the plaintiff had been violated and that he lacked the standing to sue[15].

2.9 And in ***Attorney General of Eastern Nigeria v. Attorney General of the Federation,*** the Supreme Court denied the government of Eastern Nigeria the standing to sue when it challenged the acceptance of incorrect census figures by the Federal Government 16. A common feature that runs through the cases discussed in paragraphs 2-2.8 above is that the courts have applied the rigid or restrictive approach in resolving the standing to sue issues. This is the principle endorsed by the Supreme Court in ***Abraham Adesanya v. The Federal Republic of Nigeria*** **(supra).** The principle has recently been endorsed constitutionally in section 6 (6) (b) of the Constitution of the Federal Republic of Nigeria 2011. The challenge posed by the restrictive approach is that the plaintiff or person who seeks the assistance of the court must show a personal or special interest in the constitutional infraction that he wishes to challenge. He mus: identify a damage over and above that suffered by the public is large. If his interest is shared by all members of the public he shall be denied the locus standi to sue. Being a Supreme Court authority ***Abraham Adesanya[16]*** remains good law, and exists side by side with Supreme Court authorities on the liberal or purposive rule on locus standi.[17]

3.00 New **Judicial Thinking on Locus Standi**

3.01 The new judicial thinking on the *standing doctrine* refers to the efforts of courts of law aimed at attaining a liberal, dynamic, wide or less rigorous application of locus standi. In Nigeria, the *locus classicus* or well known authority for the liberal application of locus standi is the case of ***Fawehinmi v. Akilu and Anor[18].*** In this case,

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[15] *Anaga Amanze and anor Oinvudiwe (1V85) (> NCLR 621).* See also the leading case of *Abraham Atlesanva v. Prexidenl Federal Republic of Nigeria* (page 4, footnote no...9..) which authority, according to the judge in the Anago Amanze v. Onwudiwe case, bound him "hands and feet"

[16] (1964) 1ALLNLR224.

[17] Sec *Fawehinmi* r. *Akihi (*1987) NWLR (part 67) 797 SC; *Fawehinmi v. President Federal Republic* »/"A7s,v™ (2007) 14 NWLR (part 1054) 275.

[18] 1987) 1 NWLR (PART 67) 797 SC. Sec also the earlier decision of the Bcni High Court in *Chief Patrick Ixa^ha \: rlenxnii Ah-ghe anil Orx.(1981 > 2 NCI.K 424* Other leading cases in which the liberal or purposive approach was adopted include *Adefiihiv. Governor o] Kwara State Am! Orx* (I9S4) 5 NCLR766; *Mike Ozekhome ami Ors* v. *President of the Federal Republic i>/'Xi^i'rin (1990) 2* fTA'A' *58; Beku Rnnxome Kitti anil Orx* v. *Atlornev General (Federation!* Unrcportcd Suit no M /287/92; *I-uwelunmi v. President Federal Republic of* Ws,'mV/(2007)14NWLR(part 1054)275.

the Supreme Court, whilst liberally interpreting and widening the scope of the standing doctrine, described every Nigerian as his brother's keeper, and that any Nigerian citizen including a legal practitioner, can initiate an action to compel the Director of Public Prosecution to exercise his discretion under the law to prosecute an alleged crime or in default to permit a private prosecution of it.

3.0.2 In the leading case ***of Fawehinmi v. President Federal Republic of Nigeria*** the *Court of Appeal* stated that the Supreme Court has now departed from the narrow approach in the ***Adesanya case.*** In this case, *Fawehinmi*, political activist, chairman of a political party, a tax payer and a senior legal practitioner who subscribed to an oath under the Legal Practitioners Act to defend and uphold the Constitution[19] of the Federal Republic of Nigeria, challenged in the Federal High Court, the remuneration that were being paid to two political office holders of the Federal Republic of Nigeria which were in foreign currency and far above what was prescribed by law. A preliminary objection was taken challenging Fawehinmi's locus standi. The Federal High Court denied him locus standi to maintain the action.

3.0.3 Overturning the decision of the Federal High Court, the Court of Appeal held that as the chairman of a political party, a lawyer and tax payer, Fawehinmi's complaint was one that touched on his civil rights and obligations and that same have been violated. Aboki (J.C.A), who wrote the lead judgment of *the court, held that, it will be a source of concern to Fawehinmi as a tax payer to watch the* money he contributed or is contributing towards the running of the affairs of the State, being wasted, when such funds could have been channeled into providing jobs, creating wealth and providing security to citizens[20]

3.0.4 Learned commentators have commended the Court of Appeal decision in ***Fawehinmi v. President Federal Republic of Nigeria*** as revolutionary[21]. The decision has without doubt, expanded the frontiers of the concept of locus standi and is a welcome development in Nigeria's jurisprudence. Although some authorities of first instance courts have tried to develop a wider concept of locus in the early nineteen eighties[22], the Supreme Court decision in *Adesanya* has endorsed restrictions

[19] (19X7) I NWLRlpan 67) 797 particularly (he statement of Obascki JSC at page 832 of the Report.

[20] (2007) 14 NWLR(PART 1054)275at341 parasG-H.

[21] Sec : 0/oukwu L.I.,"Coiistiluliontism, Human Rights and the Judiciary", Ph.D Thesis of the University of South Africa, June 2010.

[22] *See Chief limesl Elim Bussey v. Governor of Cross River Stale* (unrcportcd suit no CV118/79 Calabar High Court) where K.oofrch,C..I held that the plaintiff a tax payer had locus standi to challenge an appointment. Also in *Chief Paul K.C Ixagba v. Benson Ak'gbe and ors* (1981) 2 NCLR 424, a Benin high court held that a

on a person's ability to challenge infractions of theConstitution. Following the decision in ***Adesanya,*** courts have insisted on evidence of personal interest before a person challenging such infraction is accorded standing to sue.

4.0.0 Standing to Sue and the Constitution

4.0.1 The Nigerian Constitution[23] defines a person who has locus standi as one whose fundamental right has been, is being or likely to be contravened. It is trite law that fundamental rights cover all personal and proprietary rights which are capable of enforcement by a human being. To be accorded relief the person who is applying to the court of law for redress must have the appropriate standing or locus standi to seek relief. He must show that he is directly affected by an alleged wrongful act before he can be heard. The nature of the right which he seeks to enforce must be one that is personal to him, the right must have been infringed or there might exist a threat of infringement. Where the right or interest infringed is shared or suffered by all members of the public alike, a litigable interest does not exist in law and consequently, no locus standi to sue or initiate an action exists[24].

4.0.2 The constitutional basis of locus standi is stated in section 6(6) (b) of the 2011 Constitution which provides that only a person whose civil rights or obligations, are in issue can initiate an action before a law court. Standing to sue is the foundation of a suit or legal proceedings. As a doctrine, it is dynamic in nature and amenable to expansion.

4.0.3 The doctrine as contained in the provisions of section 46(1) of the Constitution has been interpreted and applied by the courts in two ways as follows:
(i) Restrictive or narrow application[25] (ii) Expansive or liberal application[26]

Nigerian tax payer had a sufficient interest in the observance of the provisions of the Constitution and consequently locus standi.

[23] Sec46(l)oflheCFRN2011.

[24] *KitmimoliOloriodeY. Oyehi and Ors (1*984) 5 Sc 1 at page 16 per AyoIrikcfcJSC CON where he remarked that a parly prosecuting an action would have a locus standi where the relicts claimed would confer some benefit on such party; such benefit much be personal or peculiar to that party.

[25] See: *Adcxanni* r. *The President l-'ederal Republic of Nigeria* (1981) 2 NCLR 358, *Olawoyin* v. *Attorney General \'<>r!liern Region* (196!) 2 SCNLR 5; *Faivehinini v. Marvan Bahangida (*1 990) Uiircporled Suit No. LD|533|90 '

[26] *l-'iiwi'hinmiv.Akiltuiml Anor* (1987)4 NWLR (part 67) 797; *Chief Patrick Isagbav. Benson Ah'ghe anil Orx* (19X1)2 NCLR 424: *I-'amhinmi* v *President Federal Republic of Nigeria* (2007) 14 NWLR (part 1054)275.

4.0.4 The locus stand! doctrine also enjoys constitutional backing in section 17 (1) of the CFRN 2011 which provides that the independence, impartiality and integrity of courts of law and easy accessibility thereto shall be secured and maintained.

4.0.5 Also under the common law, the Latin maxim "ubi jus ibi remedium" guarantees locus standi to a person who has suffered an injury or wrong access to the court of law.

5.0.0 Confusion and Inconsistency in the Criteria for grant of Standing in Nigerian Jurisprudence

5.0.1 Reviewing the case law on the subject matter, we observe that there is a state of confusion and inconsistency in the criteria used by courts in granting or refusing locus standi. A few case law decisions on the subject matter will illustrate the views of the writers.

In the leading case of ***Jideonwo and Ors v. Governor Bendel State of Nigeria***", Ovie-Whisky J. of the Benin High Court granted State Assembly legislators locus standi to sue the Governor on the ground that they had subscribed to an oath before assuming office to preserve, defend and protect the Constitution. In ***Abraham Adesanya v. President Federal Republic of Nigeria***[27]**,** the Supreme Court held that the fact that Abraham Adesanya was a Senator of the Federal Republic of Nigeria who had subscribed to an oath to defend the [28] Constitution did not confer on him sufficient standing to challenge the appointment of a nominated public office holder.

5.0.2 Conflicting decisions on locus standi were also given on the issue of the extension of the life of a local government authority. In ***Usman Mohammed v. Attorney General Kaduna State***[29]**,** S.U Mohammed C.J denied the standing to sue against a legislator who complained that the life of a local government council in his area was extended for an additional twelve months. In Lagos and Kwara States persons who were of similar status as legislator Usman Mohammed of Kaduna State were granted locus standi to challenge the reconstitution of their local government on the ground that, as rate payers, they have the right to refuse to pay rate to an illegally reconstituted local government[30]. On the other hand, tax paying farmers in Oyo State,

[27] (1981) 1 NCLR4.

[28] (1981)2NCLR358.

[29] (1981) 1NCLR 117.

in the case ***of Oluokun and ors v. Governor of Oyo State*** who challenged the reconstitution of their local government council, were denied the locus standi to sue.

5.0.3 Conflicting decisions have also been handed down on the issue of the standing or locus of tax payers. ***In Adesanya,*** the Senator's status as a tax payer, did not confer on him the standing to challenge the appointment of the nominated Chairman of the Federal Electoral Commission. In ***Chief Ernest Etim Bassey*** **v.** ***Governor of Cross River State*** **(supra) and in** ***Chief Paul Isagba v. Benson Alegbe and Ors (supra),*** *the courts in Cross River State* and Edo State respectively, granted tax payers the standing or locus to sue.

5.0.4 In ***Alhaja Aberuagba and Ors v. Attorney General of Ogun State***[31]**,** accredited representatives of wholesale beer dealers in Ogun State complained that certain sections of the Sale Tax Law 1982 were inconsistent with the Nigerian Constitution and, therefore null and void. The court held that they had sufficient interest in the Sales Tax Law to enable them sue. However, when members of Bendel State Association of Soft/Drinks Manufacturers of Nigeria, challenged a similar Sales Tax Law, they were denied standing to sue on ground that they lacked sufficient interest in the matter[32].

6.00 Locus Standi and Jurisdiction of the Court.

It is trite law that the possession of standing to sue is an issue that touches on the jurisdiction of the court.[33]

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[30] Sec *Akinpelit ami* O.v u *Attorney Gent-nil Oyo Stale and Ors (*1984) 5 NCLR 557; *Ai/eftilu untlOrx \\ (.lOvcmorKwam Sidle aiulOrx (*1984) *5* NCLR 766.

[31](19X4) 5 NCLR 6X0. Sec also the ease of *Dtimixlui and* 2 *Ors* v. *The Speaker Be/me State Hoiixe<if'Awmhly(* 1 9X3)4NCLK 625.2

[32] (1984) 6 NCLR 716.

[33] *(Nigeria Soft Drinks Co Itav. A. (!.<>/Hemlel Skite (*\ 9X4) 5 NCLR 656.