

The Problems and Prospects of the Independent *Shari'ah* Arbitration Panel (ISAP) in Southwestern Nigeria

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Abstract

The storm surrounding the declaration of Shari'ah implementation in northern Nigeria in the late 1990s inspired Muslim communities in southwestern Nigeria to establish what became known as the Independent Shari'ah Arbitration Panel (ISAP). The primary aim of the panel is to adjudicate matters related to Muslim social issues, with jurisdictional boundaries in line with the principles of Islamic jurisprudence. Efforts were made to achieve the panel's proposed objectives; however, the reality has been different, as the panels have faced numerous challenges that have hindered the smooth operation of justice for Muslims in southwestern Nigeria. This paper aims to identify the problems facing the Independent Shari'ah Arbitration Panel (ISAP) in southwestern Nigeria and explore potential solutions to overcome these challenges, in order to fulfill the valuable goals behind the establishment of ISAP in the region.

Key words: Problems, Prospects, *Shari'ah*, Arbitration, Southwest.

Introduction

At its inception in Yorubaland, Islam introduced Shari'ah law, which later intermingled with the customary law and practices of its adherents. This occurred prior to the advent of colonial administration. However, the colonialists explicitly abolished Islamic jurisprudence in Yorubaland¹. After independence, Muslims in the southwest of Nigeria exerted efforts within their capacity to ensure that the Federal Government re-established the Shari'ah Court. However, this significant task faced monumental failure, as the government viewed the adoption of Shari'ah law as a countermeasure to the conventional court system. Consequently, disputes related to Muslim personal matters are now handled in conventional courts, mostly by non-Muslim judges who lack

knowledge of Islamic Shari'ah arbitration. This has led to the issuance of judgments based on English and customary laws, as reflected in the Nigerian constitution, rather than in accordance with Shari'ah principles. These legal anomalies have fostered negative attitudes within the Muslim Ummah, with many perceiving southwestern Nigeria as being sidelined by the secular system of governance, in which Shari'ah law holds no significant role in the various legal systems. This, in turn, has impacted Muslims' social activities and personal law.

In contrast, the Muslim Ummah in the northern part of the country, where Shari'ah law exists alongside English law as outlined in the nation's constitution², benefit positively from the adoption of *Shari'ah* law as it minimizes avoidable conflicts among the Muslims. The Emirs also adopted arbitration practices and procedures based on the principles of Islamic law as contained in the Qur'an, Hadith and other supplementary sources of Islamic law.³. Although, the judicial power of *Shari'ah* is usually administered through Islamic judges called *Alkali*⁴.

Efforts were being made by the southwestern Muslims towards inauguration of Independent *Shari'ah* Arbitration pane (ISAP). Prominent are the 1976 memoranda submitted by various Islamic bodies to the Constitution Drafting Committee set up by the Murtala Muhammad Military Administration, calling for the extension of the application of *Shari'ah* to the southwestern part of Nigeria.⁵ In May 1984, the League of Imam and Alfas called for the establishment of *Shari'ah* courts in Yorubaland.⁶ Also on 13th October 1984 at a day Muslim interdenominational seminar on *Shari'ah*, the Organization of Muslim Unity (OMU) mounted pressure on the state government through the State House of Assembly to establish *Shari'ah* courts in southwestern Nigeria⁷, however, to no avail. The Muslims therefore has to find other means to resolve their judicial problem through the establishment of ISAP in the southwestern region of Nigeria. However, efforts to improve the judicial activities of (ISAP) are been affected by divergent problems. This study therefore, aimed at analyzing the problems and Prospect of the Independent *Shari'ah* Arbitration Panel in Southwestern Nigeria

Practices of *Shari'ah* law in the Southwestern Nigeria

In the colonial period, the Yoruba people in the southwestern Nigeria conventionally had their native systems of governance and judicial methods for dispute resolution, which were intensely entrenched in the Yoruba's religious and cultural practices. Thus, *Shari'ah* law was not the principal legal system in southwestern Nigeria in the pre-colonial period. However, denial of *Shari'ah* law was privately practice by the Muslims in Yorubaland and not in the running of the state affairs prior to the advent of the British rule as opined by Ambali (1998) "Although, there was the marked difference between the practice of *Shari'ah* law in the north and the southwestern which is attributable to the effects of Jihad more than any other factor, particularly where the rulers were Muslims unacceptable"⁸. However, history has it recorded, that *Shari'ah* law was practiced and applied as a state constitution in some parts of southwestern Nigeria prior to colonial administration, particularly in some Muslim communities and towns like Epe, Lagos State, Ede, Ikirun and Iwo in Osun State. Muslims in these towns of southwestern Nigeria embraced the Islamic religion with its judicial dictates, after reaffirming Islamic positive impacts on their social life filled with justice, fairness and equity. Besides, *Shari'ah* law regulated many anomalies which in those days characterises the Yoruba society, in regards to family law and interpersonal behavior,⁹ such as marriage of prohibited women, injustices in the vein of debarring female hairs from inheritance. *Shari'ah* legal law were interpreted and applied by Islamic scholars and local rulers in parts of southern Nigeria, this system co-existed with traditional practices and customary law. According to an oral interview with Shaikh Hadyatullah asserted that *Shari'ah* legal law has taken place in Iwo town and there is still the house of Alkali (Qadi) (Islamic judge) in the city today¹⁰. According to Oyeweso, (1999), Oba Habibu Olagunju, the Timi of Ede was distinguished among the Yoruba Muslim kings, owing to his strife, to amalgamate the *Shari'ah* law with indigenious tradition without interference for the governance of the people of Ede town and environs¹¹. The Oba Olagunju time in power marked the significant control of legal law, thorough application of *Shari'ah* law in a region where traditional and Islamic practices frequently intersected due to complexity of the crisis between local customs and religious laws, he managed the application of *Shari'ah* law to the highest level in his period.

159 | *DEGEL: The Journal of the Faculty of Arts & Faculty of Arabic & Islamic Studies*, Vol. 21
(1):2024

Oba Habibu Olagunju ‘was reported to be most likely the first Muslim Oba in Yorubaland.¹²

Conceptual Clarification of Alternative Dispute Resolution (ADR) in Islamic Legal Authority

Al-Sulh is an Arabic word means to reconcile and to make peace with the opponent¹³. Technically, *Sulh* is derived from the verb *saluha* or *salaha* that is to be sound and righteous.”¹⁴ literally means to cut off a dispute” or to finish a dispute” either directly or with the help of a neutral third party. Arbitration is governed by different regulations;¹⁵ In Arabic philology, the word “*Sulh*” in the context of interpersonal relationship is from the generic word “*salaha*” which means “to make peace, become reconciled, make up, and reach a compromise or settlement”.¹⁶

However, in a wider sense, the Islamic scholars capture *Sulh* in deferent wordings but the meaning is identical. For example, the Hanbali jurist Ibn Qudamah perceives *Sulh* as ‘an agreement between two disputed parties which would lead to peace.’¹⁷ According to the Maliki School of thought, *Sulh* is an agreement to end dispute even it is not yet happen’.¹⁸

Problem of the Independent *Shari’ah* arbitration panels in southwestern Nigeria

The problem of the Independent *Shari’ah* arbitration panels in southwestern Nigeria is a complex phenomenon, due to peculiar as well as specific challenges encounters by the panels owing to the following factors:

Cultural and Religious Differences

Most adherents of Islam and Christianity in southwestern Nigeria are culturally structured despite their professing adherents of the two prostelyzing religions. Some Muslims and majority of the Christian reveals their negative approach, which led to tension as soon as *Shari’ah* arbitration is introduced in the region. Buttressing this view, Green (2011) said that 92% of Nigerian Muslims and 87% of Nigerian Christians put religion first before ethnicity or nationality.¹⁹ This according to Olatoye and Yekini (2019) suggests that apart from the diverse tribal and ethnic backgrounds, the multiplicity of customary laws, the common law and other statutory legislation, religious laws like Islamic law will strongly compete amongst other potentially applicable laws²⁰ for dispute resolution.

The application of *Shari'ah* law in social; related matters in southwestern Nigeria will be for a long time controversial among Christians and the African Religion Practitioners, because both religions view *Shari'ah* law as alien to their creed and cultural practices.

Legal pluralism is a circumstance whereby two or more legal system coexists in the same social arena. Legal pluralism system in Nigeria comprises of constitutional, customary as well as *Shari'ah* laws which are all applicable in the social activities (marriage divorce child custody) in the northern path of Nigeria. Legal pluralism in Nigeria always creates mystification, particularly whenever the citizens search for arbitration under *Shari'ah* legal law especially if the disputes on ground also involves the state legal system.

Financial constrained is another major problem confronting the implementation of Independent *Shari'ah* arbitration panel in southwestern Nigeria as most of the arbitration panel are financially handicapped to successfully run the panel jurisdiction's activities as required particularly payment for the judge's salary. Other panel staffs like the registrar, clerks and panel members also maintained themselves with affordable assistance to the panel to achieve the aims and objectives of inauguration of the ISAP. Other expenses, which cover the arbitration panel's record printing materials, secretarial maintenances, as well as other varied expenses are part of the financial problem²¹.

Negative approach of the Muslims is another bottleneck in the implementation of ISAP in southwestern Nigeria Most of the Muslims in southwestern Nigeria are aggressive to the establishment of the Independent *Shari'ah* Arbitration Panel owing to the fact that the arbiters and the purveyors belong to the same Islamic group, and Association with similar creed and tenants. For instance, the ISAP, Ogbomoso chapter is dominated by the *Salafist* movement only, which many Muslims perceived as extremists that affirm their doctrines while condemning other doctrines of Muslims²². Buttressing the above assertion, Makinde and Ostien (2011), states that some Muslims in Lagos state brand ISAP as belonging to the respective Muslim group National Muslim Youth or Supreme Council for *Shari'ah* in Nigeria (SCSN) rather than being acceptable to all Muslims.”²³ Similarly, the Leagues of Imams and Alfas have actively

opposed the establishment of ISAP in Lagos and Oyo States respectively. Buttressing this statement Makinde and Ostien (2011) remarks that in Oyo state, the League of Imams and Alfas found it difficult to accept any crop of people other than themselves to run and adjudicate in such *Shari'ah* panels. These *Ulamah* would rather sabotage the scheme or have some rivals usurp their exclusive traditional rights²⁴

Conventional courts frequently rule out the verdicts given on *Shari'ah* basis by the arbitration panel on social related issues, like *AlNikkah* (marriage) *talaq* (divorce) and *Mirath* (inheritance). Some of the issues resolved by ISAP are sometimes refer to the conventional courts of all grades because the award given by the *Shari'ah* panels is unfavorable to their expectation. Since the verdicts on those issues are given on *Shari'ah* basis. The conventional courts do not recognize *Shari'ah* law in southwestern Nigeria in all issues for a number of reasons which related to the secular and legal structure applicable in the Nigeria legal system.

Similarly, few traditional rulers in southwestern Nigeria oftenly reject the verdict awarded by the Independent *Shari'ah* arbitration panel, while some endorsed the awards given by the panels on social related issues. This may be attached to the level of their faith in Islamic law values in resolving disputes among warring parties. In addition, most of the traditional rulers in southwestern Nigeria, are culturally rooted, which made the rulers to reject some of the arbitration panel's award on social activities issues, like *Al-nikkah* (marriage) *talaq* (divorce) *Haddana* (child custody) and *Mirath* (inheritance) that are not compatible with the customary law jurisdictions. For instance, a case of Abdul Kareem Salami whose three wives disputed on how their late husband's properties should be share to his heirs. The last wife khadijah claimed that she is the only legally married to Abdul Kareem, although she met the other two co-wives with the husband, the panel awarded the property to khadijat based on her claimed. The matter was reported to his Royal Majesty, Oba Jimoh Oladuni Ajagungbade III by the elder brother of the deceased Ibraheem Salami. *Oba* Oladunni set aside the award of the arbitration panel (Ogbomoso chapter) and he distributed the estate to all the children of the deceased in accordance with the customary law. Recently the *Oba* of Ado-Ekiti, *Oba* (Adeyema Adeyinka) ordered the dissolve of the newly inaugurated ISAP chapter of Ekiti state

Ado Ekiti, saying that the establishment of *Shari'ah* legal system in Ekiti state is against the traditional system of dispute resolution.

Opposition of Non Muslim Organization Generally, the Muslims effort of introduction of *Shari'ah* law for the Muslims in Nigeria has been a nagging and unsolvable problem for a quite numbers of years due to rivalry between adherents of the two major religion of Islam and Christianity in southwestern Nigeria. Several scholars hypothesize that *Shari'ah* law is territorially limited to the northern part of Nigeria. Buttressing this view, Agbede (1997) and Kumo (1980) among other scholars assert that *Shari'ah* law is not applicable in the southern part of Nigeria²⁶. due to its territorial limitation to northern Nigeria as assumed by the writers. This reaffirm the non- chanllant attitude of the non - Muslims Organization to the establishment of the Independent *Shari'ah* Arbitration Panel in southwestern Nigeria. Makinde (2017) asserts that 'the opposition of non-Muslims (organization), particularly, the Christians to *Shari'ah* law compounds the problem of the establishment of *Shari'ah* courts in the southwestern Nigeria. 'The opposition has been vociferously and maliciously displayed in their views which were expressed in both the print and electronic media and during conferences organized to debate the issue of re-introduction of *Shari'ah* through ISAP²⁷. Such hate speech has apparently appears in the word of Dodo (2000) who suggested that 'When the 1999 constitution of Nigeria will be reviewed, the Islamic *Shari'ah* law should be removed completely in the subsequent constitution and be observed and practiced in the way Christians do with the ecclesiastia.²⁸

To further buttress our assertion on the negative approach of non- Muslim Organization to establishment of the ISAP in southwestern Nigeria is the recent idea of establishment of Independent *Shari'ah* Arbitration Panel in Oyo town by the Supreme Council for *Shari'ah* Oyo town. The idea has been confronted with hostility and war from the Christian Association of Nigeria Oyo state chapter in Ibadan. The announcement sparked intense debates on social media and within the state, with critics arguing that the introduction of a *Shari'ah* court could disrupt the state's religious harmony.²⁹ The Oyo State Chairman of the Christian Association of Nigeria, Apostle Joshua Akinyemiju, dismissed the initiative, describing it as unconstitutional and a threat to the state's secular nature. According to

the Christian leader “This should not happen in Oyo State, where Christians and Muslims coexist in nearly every family as there is no law to support this, and the government is not aware. We won’t allow anything that jeopardizes the peaceful coexistence we enjoy,³⁰” The Yoruba Council Worldwide (Igbimo Apapo Yoruba Lagbaye) and the Pan Yoruba Group, the (Afenifere) all make their derogatory remarks on the establishment of the ISAP in southwestern Nigeria. The Yoruba Council Worldwide has even threaten to take legal action against the purveyors of the Oyo chapters of *Shari’ah* panel if they refused to abstain from the initiative of the *Shari’ah* arbitration panel in Oyo town. Despite that *Shari’ah* arbitration panel subside in most part of southwestern Nigeria include Ibadan. Ogbomoso, Kish. Oshogbo Ijebu-Ode, Abeokuta, and it have been recently established in Ekiti state. Despite that the establishment of ISAP in southwestern Nigeria is in accordance with the provisions of Arbitration and Reconciliation, recently amended in 2023, non-Muslims organization are still against the move of its establishment.

Last but not least, is the lack of coercive authority. The inability of the Independent Shari'ah Arbitration Panel (ISAP) to compel respondents to defend the complaints levied against them, as well as the acceptance of the panel's awards, represents a significant obstacle to the effective operation of the ISAP in southwestern Nigeria. While the commencement of proceedings in the ISAP may seem straightforward, prolonged proceedings often render the panel's efforts at dispute resolution futile, as many litigants fail to comply with the awards issued by the ISAP in the majority of disputes adjudicated by the panel.

Prospects to the problems of ISAP in southwestern Nigeria

1. One of the claims of the Nigerian government in its constitution is the guarantee of freedom of religion and equal protection of human rights for all citizens, regardless of religious affiliation. The Nigerian government's responsibility in this regard is to ensure that the activities of the Independent Shari'ah Arbitration Panel (ISAP) align with the constitutional framework and safeguard the constitutional rights of adherents of other religions in southwestern Nigeria. At the same time, Shari'ah law should not be imposed on non-Muslims. Its scope should be confined to Muslims in

southwestern Nigeria, where the system is practiced. The demarcation of its jurisdiction should be clearly defined in social matters, such as marriage, divorce, inheritance, and family issues, and should never infringe upon the religious or cultural rights of others.

2. The Independent Shari'ah Panel in Nigeria should play a vital role in addressing the challenges of legal pluralism by encouraging a balanced and reasonable approach to both Shari'ah and secular legal systems. The panel should outline its areas of jurisdiction, such as social matters like marriage, divorce, inheritance, and contracts. In situations where disputes require the intervention of both secular and Shari'ah laws, the ISAP should apply the Sulh (mediation) process to ensure that the outcomes reflect the values of both the Shari'ah and conventional legal systems.

The financial constraints of the ISAP can be addressed through the proper restructuring of its financial system, including the reduction of enforcement program costs. Social welfare activities, such as Zakat distribution, should be extended to the ISAP to meet its financial needs. Additionally, the wealthy members of the Muslim community should be consulted to extend their philanthropic activities to the ISAP, and external aid could also be beneficial if used judiciously to sustain the judicial administration of the ISAP.

Muslim communities should be consistently and adequately oriented through seminars, lectures, sermons, and other forms of social media about the application of Shari'ah legal principles in their daily lives. They should view its application as a mandate, with non-compliance resulting in eternal damnation. The Islamic scholars in southwestern Nigeria who perceive their authority as being undermined by the ISAP should be adequately consulted and enlightened about the benefits of the panel's judicial activities for both Muslims and the community at large. In this way, Islamic scholars will affirm their recognition of the ISAP and acknowledge that they have a say in the panel's judicial activities.

Traditional rulers, in respect of their religion, should be included in the proceedings and decision-making process of the panel's awards, as well as in discussions about the application of Shari'ah principles in dispute resolution within the Muslim community. This will promote a sense of partnership and trust in the minds of traditional rulers toward the panel. The traditional rulers should be adequately oriented about the ISAP's focus on religious and moral guidance, ensuring that it does not undermine their political authority, which is contrary to Allah's dictates. Additionally, the arbitration panels should frequently consult traditional rulers on vital issues that may intersect with their authority, reaffirming that the ISAP values their insight.

One structural solution to the problem of the lack of coercive authority for the Independent Shari'ah Arbitration Panel in southwestern Nigeria is the enforcement of the awards given by the panel to disputants through legal recognition of the ISAP's judicial activities within the Nigerian legal system. This can be implemented by integrating the Shari'ah panel, with defined jurisdictional boundaries, into the Nigerian conventional legal system. The awards of these panels in dispute resolution can be supported by the coercive power of the southwestern state governments, though this may prove difficult. The panel can also collaborate with secular courts to provide the necessary legal backing to ensure compliance with the arbitration awards issued by the panels.

Non-Muslim organizations, such as the Christian Association of Nigeria (CAN) and the Pan-Yoruba groups, including Afenifere and the Yoruba Council Worldwide (Igbimo Apapo Yoruba Lagbaye), who oppose the establishment of the Independent Shari'ah Arbitration Panel in southwestern Nigeria, are acting unconstitutionally. Their opposition constitutes discrimination against the fundamental rights of Muslims, as outlined in Article 42(1) of the Nigerian Constitution, which states: "A citizen of Nigeria, of a particular community, ethnic group, place of origin, sex, religion, or political opinion, shall not, by reason only that he is such an individual, be subjected to any disability or restriction which citizens of Nigeria of other communities, ethnic groups, places of origin, sex, religion, or political opinions are not subject to."³¹

A second constitutional argument is found on the right to freedom of thought, conscience, and religion as stipulated in Article 38 (1) of the Nigeria constitution quoted in part that:

‘Every person shall be entitled to freedom of thought, conscience and religion, including freedom to manifest and propagate his religion or belief in worship, teaching, practice and observance’³². The constitution is applicable to private and public sectors in the Nigeria communities. Likewise, section 277(1) (2) (a) (b) (c) (d) and (e) of the 1999 of Nigeria constitution has stipulate what Islamic personal law implies ‘the law of the family and that of inheritance.’³³ in addition section 7(II) gives the court’s jurisdiction over “civil proceedings in Islamic law in which the existence or extent [of] a legal right, power, duty, liability, privilege, interest, obligation or claim due to an individual or individuals is in issue.”³⁴ Therefore, southwestern Muslims of Nigeria have the constitutional right, of litigating their social disputes under *Shari’ah* legal law at least in their private affairs, including marriage, divorce inheritance and child custody among others.

Conclusion

This work highlights the challenges and prospects of the Independent Shari’ah Arbitration Panel (ISAP) in southwestern Nigeria. Despite the opportunities available to Muslims to institutionalize private Islamic arbitration panels following prolonged efforts, the problems outlined above continue to hinder the smooth operation of these panels in southwestern Nigeria and urgently need to be addressed. Among these issues, the most concerning is the apparent lack of interest displayed by Muslims in the panel’s judicial activities, as evidenced by the negative attitudes toward the panel. Additionally, the southwestern Nigerian governments and traditional rulers also exhibit a lack of interest in the establishment of the panel, driven by political considerations, which consequently impacts the Muslims' judicial rights.

However, the southwestern Muslim community cannot be solely held responsible for the underperformance of certain ISAP chapters in the region, as the aforementioned problems hinder the achievement of the

panel's goals. The pioneers responsible for the panels must also shoulder some of the blame for the misconduct of certain panel members. The attitudes of all parties involved suggest that the Muslims' advocacy for Shari'ah jurisdiction in southwestern Nigeria is largely symbolic. Only time will determine the future viability of the Independent Shari'ah Arbitration Panel in some parts of southwestern Nigeria.

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169 *DEGEL: The Journal of the Faculty of Arts & Faculty of Arabic & Islamic Studies*, Vol. 21 (1):2024

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