

Abstract

Over the years, successive Nigerian constitutions have guaranteed the citizens right of access to justice. Access to justice when viewed literally is an opportunity an individual has to approach the court of law to ventilate his grievances against an individual or government. Generically, access to justice means more than merely accessing the court of law but include equal opportunity that citizens have to access political order and available resource in a given society. In Nigeria, despite the constitutional provision for citizens to access justice, so many factors work against realization of same. Among the factors is poverty. The objective of this paper is to review the impacts of poverty on access to justice in Nigeria. The paper was commenced by reviewing the relevant provisions of law that provide for access to justice in Nigeria. For this purpose, the paper adopted a doctrinal research method. It was discovered among others that inequality in the distribution of the nation's wealth coupled with the lip service that successive governments had paid on human capital development over the years contributed to wide margin in poverty line in Nigeria. This in turn slowed down the pace for which Nigerians access justice. It was based on the foregoing that recommendations were made.

Keywords: 'Access to Justice', 'Poverty', 'Right', 'Impacts of Poverty', 'Nigeria'.

1. Introduction

The fundamental objectives of the State Policy in Nigeria include among others the provision for freedom, equality and justice which is accessible to all the citizens.¹ Access to justice means more than the opportunity granted to citizens to ventilate their grievances in the court of law if there are infraction on their rights by fellow citizen or government but encompasses the opportunity to access the economic system that guarantees reasonable standard of living in a society. In Nigeria, the economic system is operated in such a manner that permitted the concentration of wealth and the means of production and exchange in the hands of few individuals especially the political class.² This policy has created class society in the country. The result of same is the stretching of the poverty margin beyond elastic limit. Economically, the tripartite needs of man are food, cloth and shelter. In practice, these triplet needs of a man occupy his scale of preference in his daily pursuit. In a society where majority of the citizens live below poverty line³ as a result of inequality in the distribution of wealth⁴, opportunity cost demands that limited resources will be used to sustain a living rather than investing same in cost litigation. In this case, access to justice remains part of the aspiration to attain when the individual income improves.

* **IGWE ONYEBUCHI IGWE**; LLB, BL; LLM; PhD, is a lecturer in the Department of International Law and Jurisprudence, Nnamdi Azikiwe University, Awka, Nigeria. His Email is igwelaw2010@gmail.com.Tel: +1237038846290

AGBOR BASSEY; LLM;LLB;BL; is a lecturer in the Faculty of Law, University of Calabar.

¹ Constitution of the Federal Republic of Nigeria 1999 (as amended), section 17.

² *Ibid*, Section 16(2) (c) of the Constitution provides that 'The state shall direct its policy towards ensuring that the economic system is not operated in such a manner as to permit the concentration of wealth or the means of production and exchange in the hands of few individuals or of a group.'

³ The World Bank estimated the by 2021, 100.9 million Nigerians will be living in poverty. A. Irwin et al 'Using Date to Combat the Ongoing Crisis, and the Next in Nigeria.' <blogs.worldbank.org accessed on 22nd June, 2021>.

⁴ *Op cit*, Section 17(1) of the Constitution provides that the state social order shall be founded on the ideas of freedom, equality and justice.

This paper is set to discussing the impacts of poverty on the right of access to justice in Nigeria. For this purpose, the paper shall examine the key words in the topic under discourse to *wit*: access to justice, poverty, right and the consequences of poverty on access to justice in Nigeria among others. The paper shall make recommendations on the roadmap to enhancing access to justice in Nigeria.

2. Access to Justice

It has been acknowledged that access to justice includes the ‘substantive and procedural mechanisms designed to ensure that citizens have opportunity of seeking redress for the violation of their legal rights within that legal system.’⁵ Accordingly, access to justice includes other components such as the premises where justice is delivered, the quality of human and material resources available.⁶ This definition of access to justice is appears to be of narrow approach. On the contrary, access to justice means more than the opportunity to access court. It includes the availability of the means of accessing the justice in all facets to *wit*: career opportunity, political, educational and economic enhancement. Oputa noted that access to justice could either be viewed in narrow or broader sense. In its broader sense, access to justice encompasses access to ‘political order, and the benefits accruing for social and economic developments in the State.’⁷ In narrow sense, access to justice means the opportunity to access court of law to ventilate grievances. It is the stand of this paper that the narrow view of access to justice is difficult to actualize in the absence of the opportunity to access the benefits flowing from the social, political and economic development of the State.

It has been noted that the provision of equal access to the benefits and protection of law is the most consistently elusive challenges to democratic legal system around the globe.⁸ In *Idris v. Agumga*⁹, the Court of Appeal Abuja Division held that access to court implies approach or means of approach to court without constraint. From the above judicial dictum, access to justice is not only opportunity granted to citizens to approach court of law but includes availability of the resources to approach court without restraint. Section 17 (2) (e) of the Constitution of the Federal Republic of Nigeria 1999 (as amended) provides that ‘In furtherance of the social order- the independence, impartiality and integrity of courts of law, and easy accessibility thereto shall be secured and maintained.’ Section 14 (2) (b) of the same Constitution places the security and welfare of the citizens as the priority of government. Where the welfare of the citizens is relegated to the bottom of the scale of the government preference, injustice will always play priority and access to justice becomes a luxury. Accessibility to court of law cannot thrive in a society where majority of the populace wallow in poverty due to unequal distribution of the collective resources of that society. The standard of living of the populace in Nigeria today has unearthed that the welfare of the people of Nigeria is never the primary purpose of the government. By the World Bank prediction, 100.9 million Nigerians will be living in poverty by 2022.¹⁰ The above prediction is not far from the reality in view of the prevailing insecurity in Nigeria currently. As a result of poverty in Nigeria, crime rate increased from Northeast to Northwest, North Central to South South and Southeast to Southwest. As a result of the above, the price of essential food items and other commodities increased on geometrical progression ranging from garri to rice, yam, tomatoes, onions,

⁵ E Ojukwu, *et al*, *Handbook on Prison Pre-trial Detainee Law Clinic*, (Abuja: Network of University Legal Aid Institution, 2012), p. 121.

⁶ *Ibid*.

⁷ C A Oputa, *Rights in the Political and Legal Culture of Nigeria 2nd Idigbe Memorial Lectures* (Lagos: Nigerian Law Publications Ltd, 1989), p.50.

⁸ Rekosh et al, eds, *Access to Justice, Legal Aid for The Unrepresented Pursuing the Public Interest*, (New York: Columbia University School of Law, 2001) p.21.

⁹ [2015] 13 NWLR (Pt.1417) 441 at 463.

¹⁰ A Irwin et al ‘Using Data to Combat the Ongoing Crisis, and the Next in Nigeria.’ <blogs.worldbank.org accessed on 22nd June, 2021>.

vegetables, magi, groundnut oil amongst others. Nigeria is made of the population that is mostly agrarians. With the insurgency, banditry, kidnapping, herdsmen/farmers clash among others, it is not in doubt that the economy of farmers and other Nigerians are greatly challenged. The end product is the poverty ultimatum given to many households in Nigeria who are still managing to feed.

Criminal activities resulting from poverty in Nigeria has affected the operation of international businesses. The consequence is that more Nigerians are thrown out of their jobs and some others placed on half salary. This in turn affected the children of school age as some whose parents cannot meet up with the demand of paying of school fees have to drop from school. Outside the obvious, injustice has birthed the various forms of agitation for sovereign nations among ethnic blocks in Nigeria. This has also birthed some form of constraint measure such as sit-at-home order of the Indigenous People of Biafra which if continued will further impoverish majority in Nigeria.

3. Poverty

Black's Law Dictionary defines poverty as 'The condition of being indigent; the scarcity of the means of sustenance.'¹¹ Rowntree noted that poverty is 'a state of household command over resources at a level which is insufficient to obtain a basket of goods and facilities judged to be minimum necessities in the contemporary circumstances of the society under study.'¹² Dressler looked at poverty in two dimensions.¹³ They are absolute and relative poverty. Accordingly, absolute poverty is 'a situation in which, an individual or household, is unable to provide even the basic necessities of life.' Relative poverty entails 'a situation in which individual or household is unable to maintain the standard of living considered normal in the society in question.'¹⁴ McConnel noted that a family lives in poverty when its basic needs exceed its available means of satisfying them.¹⁵ Oputa described poverty as 'another modern form of slavery.'¹⁶

Awolowo noted that poverty is a condition which exists when a person lacks the means of satisfying the necessities of life.¹⁷ He contended that the characteristics of poverty are well known. They include: under-nourishment or malnutrition, wretched and degrading shelter, shabby clothing, total lack of any kind of comfort and luxury. The learned author argued that:

Because of his malnutrition and his physical and psychological degrading conditions of living, he is inefficient, his productivity is hopelessly low, he is technically ignorant, he succumbs readily to disease, he has little zest for life, he has little or no enthusiasm for what he does and in consequence of all these, his poverty persists on an increasing scale.¹⁸

The United Nations Department of Economic Affairs acknowledges that poverty entails more than the lack of income and productive resources to ensure sustainable livelihood. Its manifestations include hunger and malnutrition, limited access to education and other basic services, social discrimination and

¹¹ B A Garner; *Black's Law Dictionary* (7th Edn: USA, St Paul Minn, 1999) p.1189.

¹² S Rowntree cited by JN Aduba, 'Impact of Poverty on the Realisation of Fundamental Human Rights', *Journal of Human Rights Law and Practices Vol. 3 Numbers: 1,2,3* (Lagos: Civil Liberty Organisation, 1993) p. 36.

¹³ D Dressler *et al*, *Sociology: the Study of Human interaction* (3rd edn, New York: McGraw Hill Inc., 1976) p.481.

¹⁴ *ibid*

¹⁵ C R McConnel, *Economics: Principles, Problems and Policies* (4th edn, New York: McGraw Hill Inc., 1969) p.671.

¹⁶ A Oputa, *Human Rights in the Political and Legal Culture of Nigeria, 2nd Idigbe Memorial Lectures* (Lagos: Nigerian Law Publications Ltd, 1989) p.94.

¹⁷ O Awolowo, *Path to Nigerian Greatness* (Enugu: Fourth Dimension Publishers Co. Ltd, 1981) p.76.

¹⁸ *ibid*.

exclusion as well as the lack of participation in decision-making.¹⁹ Poverty produces hopelessness in a man. It makes a man to think irrational. It is death warrant. Poverty is manifested in naïve, inferiority, cowardice and mental retardants. Poverty makes a man to appear older than his age. Poverty breeds poverty. It is bad omen. It has no friend, no brother or sympathizers. The poor is always preyed upon. The poor can easily get irritated. Whatever he does is an offence against his household, age grade and community.

The United Nations in 1998 noted that:

Fundamentally, poverty is a denial of choices and opportunities, a violation of human dignity. It means lack of basic capacity to participate effectively in society. It means not having enough to feed and clothe a family, not having a school or clinic to go; not having the land on which to grow one's food or a job to earn one's living, not having access to credit. It means insecurity, powerlessness and exclusion of individuals, households and communities. It means susceptibility to violence, and it often implies living on marginal or fragile environments, without access to clean water or sanitation.²⁰

By Resolution 47/196 of 22nd December, 1992, the United Nations declared 17th October of every year as the day to mark the International Day for Poverty Eradication. More than 27 years down the line, about 40% of Nigerian populations still live in poverty.²¹ Poverty margin in Nigeria is wide. This is despite the provision of Section 16(2)(c) of the Constitution of the Federal Republic of Nigeria 1999 (as amended) which provides against the operation of the economic system in such a manner that will promote the concentration of wealth or other means of production and exchange in the hands of few individuals or group. In Nigeria, the political class and other few individuals hijacked the economy to their personal gains while the majorities wallow in poverty. These few individuals determine the means of production and distribution of the common wealth of the nation. Despite various social intervention schemes introduced by government for the purpose of lifting some Nigerians out of poverty,²² so many Nigerians still wallow in abject poverty. This is propelled on one hand by the size of Nigeria population as these social interventions can only be accessed by few people and often time hijacked by the ruling class. On the other hand, inflation rate is the key driver that promotes poverty. The cost of living in Nigeria is not on equal proportion to the sources of income of individuals. The end products of social interventions in Nigeria often appear to represent a case of throwing water on the feathers of a fowl.

Access to justice cannot thrive in a country where there is inequality in the distribution of the economic resources, political power and social amenities. Access to justice cannot thrive in a country where impunity prevails. Access to justice cannot thrive in a society where man inhumanity to man is the test to attainment of political power. Poverty in Nigeria has remained endless circle. It is a social

¹⁹United Nations Department of Economic and Social Affairs, "Poverty Eradication" <<https://www.un.org> accessed on 14th June 2021>.

²⁰UN Statement, June 1998 cited in a Statement submitted by Youth Alliance for Leadership and Development in Africa, a non-governmental organization in consultative status with the Economic and Social Council on 1st December 2017 <<http://undocs.org> accessed on 14th June 2021>.

²¹The National Bureau of Statistics "2019 Poverty and Inequality in Nigeria" noted that 40 percent of the total population, or almost 83 million people, live below the country's poverty line of 137,430 naira (\$381.75) per annum.,<https://www.wolbank.org> accessed on 14th June 2021.

²² Some of the social intervention programmes introduced by the Federal Government of Nigeria include: trader money, market money, anchor borrowers, survival fund among others. In the past, some poverty eradication schemes had been initiated by Obasanjo's administration, Goodluck's Administration among others.

cankermouth. Poverty is a killer of many talents and a big cog in the wheel of justice. A poor man does not think about his right and even if he does, he cannot regard means of ventilating same as his priority. Access to justice is a luxury to a man who remain in perpetual struggle on how to put food on his table with little or no means of securing his daily bread.

4. Right

Osborn's Concise Law Dictionary defines right as 'an interest recognized and protected by the law, respect of which is a duty and disregard of which is wrong.'²³ It is the ability resident in a man to control his affairs against the intrusion of others under the assistance of the State. Aiyedun noted that right to access to justice presupposes the existence of accessible dispute resolution systems and the application of fair standards of justice.²⁴ Access to justice is guaranteed by the Constitution of the Federal Republic of Nigeria 1999 (as amended), regional and international bills of rights. It is a universal concept that every civilized nation adopted in her national laws to ensure stability in the polity. For this purpose, Section 46 (1) of the Nigerian Constitution²⁵ provides that:

Any person,²⁶ who alleges that any of the provisions this Chapter has been, is being or likely to be contravened in any State in relation to him may apply to a High Court in that State for redress.

In the same vein, article 8 of the Universal Declaration of Human Rights provides that: 'Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the Constitution or by law.' The Preamble to the Fundamental Rights (Enforcement Procedure) Rules, 2009²⁷ provides in paragraph 3(b) that:

For the purpose of advancing but never for the purpose of restricting the applicant's rights and freedoms, the court shall respect municipal, regional and international bills of rights cited to it or brought to its attention or of which the court is aware, whether these bills constitute instruments in themselves or form parts of larger documents like constitutions. Such bills include:

- (i) The African Charter on Human and Peoples' Rights and other instruments (including Protocols) in Africa regional human rights system.
- (ii) The Universal Declaration of Human Rights and other instruments (including Protocols) in the United Nations human rights system.

Paragraph 3(c) of the Fundamental Rights (Enforcement Procedure) Rules provides that: 'For the purpose of advancing but never for the purpose of restricting the applicant's rights and freedoms, the

²³L Ruthford & S. Bone, *Osborn's Concise Law Dictionary*, (London: Sweet & Maxwell, 1993) p. 293.

²⁴A Aiyedun, 'Accessing Justice within Plural Normative Systems in Africa: Case Study of South Africa' *Journal of Clinical Legal Education and Access to Justice vol.1* (Abuja: NULAI Nigeria, 2012) p.49.

²⁵The Nigerian Constitution in this context refers to the Constitution of the Federal Republic of Nigeria 1999 (as amended).

²⁶ In *Nemi v AG Lagos*, [1996] 6 N.W.L.R. (Pt 452) pp.42 -59, the court held that prisoners are entitled to enforce their rights because of the word, 'any person' used by section 46(1) of the Constitution of the Federal Republic of Nigeria 1999 (as amended).

²⁷The Fundamental Rights (Enforcement Procedure) Rules, 2009 was made by the Chief Justice of Nigeria pursuant to section 46 (3) of the Constitution of the Federal Republic of Nigeria 1999 (as amended).

court may make consequential orders as may be just and expedients.’²⁸ In the same vein, the courts are enjoined to proactively pursue enhanced access to justice for all classes of litigants, especially the poor, the illiterate, the uninformed, the vulnerable, the incarcerated and the unrepresented.²⁹

For the purpose, Section 46(4) (b) of the Nigerian Constitution provides that the National Assembly shall make provisions-

- (i) for the rendering of financial assistance to any indigent citizen of Nigeria where his right under this Chapter has been infringed or with a view to enabling him to engage the services of a legal practitioner to prosecute his claim, and
- (ii) for ensuring that allegations of infringement of such rights are substantial and the requirement or need for financial or legal aid is real.

The above provisions of the Nigerian Constitution are for the purpose of advancing the right of access to justice in Nigeria. However, it appears that majority of the indigent citizens of Nigeria are either not aware of the provision for financial assistance by the National Assembly to ventilate their rights if violated or if aware, cannot afford the expenses of lobbying the National Assembly to make provisions for their financial assistance to access justice. Outside the above, poverty in Nigeria has put the indigents in perpetual fear of leaders including their representatives at the National Assembly and the ruling class has cashed in on the predicaments of the indigents to create the class of burgers and proletariats. A poor can easily accept any fate that befell on him and attribute same to act of God. The end product is that poverty has hampered the accessibility of justice in Nigeria.

5. Implications of Poverty on the Right to Access to Justice

Poverty is one of the challenges to the realization of the right to access to justice in Nigeria. Although it is often said that court is the last hope of the common man, in practice going to court has some financial implications because the applicant has to pay filing fees, he has to engage the services of a lawyer and pay his bills amongst other expenditures. This makes the mission impossible to many Nigerians especially the poor and the downtrodden. In the search for justice and redress resulting in the effectuation of his rights, the ordinary citizen of Nigeria is caught in the mess of a rather vicious circle:

1. The court cannot adjudicate upon and effectuate his rights unless there is a suit complaining about the breach or threatened breach of these rights filed in court.
2. People especially the illiterate masses of our country do not even know what their human rights are. They may therefore not even know when those rights have been or are being infringed.
3. Even if the ordinary citizen knows of his rights and knows that they are being infringed, he may be too afraid to sue the powers that be. It does require considerable courage to drag the Chief Executive or functionaries of the Government to court. And very few of our people have that courage.
4. Where there is an awareness of the right and the knowledge or realization of its breach or threatened breach and the courage to prosecute

²⁸ The Fundamental Rights (Enforcement Procedure) Rules, 2009, Order XI provides that at the hearing of the application under the rules, the court may make such orders, issue such writs and give such directions as it may consider just or appropriate for the purpose of enforcing or securing the enforcement of any of the Fundamental Rights provided for in the Constitution or African Charter (Ratification and Enforcement) Act.

²⁹ The Fundamental Rights (Enforcement Procedure) Rules, 2009, Preamble 3(d).

the claim, the luxury of a costly and prolonged litigation up to the Supreme Court could be a challenge.³⁰

The curiosity of paper flows from the fact that the Constitution of the Federal Republic of Nigeria, 1999 (as amended) provides in its preamble that the Constitution is for the purpose of, ‘promoting the good government and the welfare of all persons in our country on the principles of Freedom, Equality and Justice.’³¹ This provision appears a tale by the moonlight when juxtaposed with the growing poverty challenge among greater number of Nigerians. A trip to Nigerian villages and even towns unearths a sad reality that poverty level in Nigeria has gone below the marginal line. Poverty is a cankerworm. The poor may know their rights but the means of ventilating same if breached becomes a costly venture. The poor finds it difficult to access justice as a result of high cost of litigation coupled with delays in determination of cases occasioned by our legal system. In practice, only the rich, the powerful and the dominant class seem to have all the rights in Nigeria while the poor, the weak and the downtrodden wallow in silence, in patience, always on their knees asking God to intervene in their circumstances. From the above, it is clear that the institutional framework through which the poor can realize his rights is working against him. Aguda stated as follows while commenting on the barriers to the realization of the right to life in Nigeria that:

This means much to me and those of you who have some measures as to how we can feed ourselves and other members of our family. But this is only an empty right from the point of view of those citizens of ours who do not know where or how they and other members of their families will get next meal...what does the right to life mean to a man when indeed he feels he will be happier if that very life is taken away from him.³²

Accordingly, he queried thus:

What fair hearing can a poor person hope to have when he cannot even boast of a square meal a day? If he is cheated of his right, he would certainly prefer to leave the matter in the hands of God than risk death through starvation as a result of investing all that he and his family can boast of as the total of their worldly possession in trying to assert an illusory right to fair hearing of his grievance in courts.³³

The question is, does fair hearing mean anything to a person who cannot pay for court summons let alone afford the services of a legal practitioner? Access to justice remains an illusion in a country where majority of the citizens cannot achieve happiness through the instrumentality of justice as a result of lack. As far back as in the 18th century, an English philosopher, Jeremy Bentham has propounded that the aim of law is be geared towards the maximization of human happiness. Hence, utility in law is achieved when it promotes the ‘greatest happiness of the greatest number of people.’³⁴ It is not enough for the Nigerian constitution to provide for ‘freedom, equality and justice which should be accessible to all the citizens’ when greater number of Nigerians are technically denied freedom, equality and means of accessing justice due to bourgeoisie and proletariat class that characterized Nigerian society. Equality in Nigeria is hampered by unequal distribution of wealth.

³⁰ C A Oputa, ‘Human Rights in the Political and Legal Culture of Nigeria’, *op cit*, pp 65-66.

³¹ The Constitution of the Federal Republic of Nigeria 1999 (as amended), Paragraph 4 of the Preamble.

³² T A Aguda, ‘A New Perspective in Law and Justice in Nigeria’, *Distinguished Lecture Series*, (Kuru: National Institute for Policy and Strategic Studies, 1985), p.8.

³³ *Ibid.*

³⁴ Cited by E Malemi, *The Nigerian Legal Method* (Lagos: Princeton Publishing Co., 2012) p. 52.

McQuoid-Mason noted that access to justice ‘refers to social justice, such as the fair distribution of health, housing, welfare, education and legal resources in society, including where necessary, the distribution of such resources on an affirmative action basis to disadvantaged members of the community, and concerned with the ‘need’ rather than the ‘wants’ of society.’³⁵ Freedom is not visible in a society where citizens are preyed upon by fellows as a result of insecurity. The objective of the provision for access to justice should be to lay foundation for the greatest happiness of the citizens. The measure of access to justice is the utility of same by citizens. Any government policy that does not promote greater happiness in the greater number of the citizens remains unpopular.

6. Conclusion and Recommendations

The paper laboured to establish that the provisions for access to justice in Nigeria will remain tales by the moonlight if nothing is done by the government to close the gap in poverty line.

By scale of preference, the tripartite necessities of life take priority in man’s scale. In a situation where the means of providing food, shelter and clothing is a luxury, access to justice is often banished to the bottom of the scale of preference.

It is therefore recommended that in order to close the wide margin of poverty in Nigeria, Section 16(2)(c) of the Constitution of the Federal Republic of Nigeria 1999 (as amended) which provides for the non-concentration of wealth or other means of production and exchange in the hands of few individuals or group should be made justiceable.

In this light, the practice of unequal distribution of the resources of the country will become a cause of action for individuals or groups.

Outside the obvious, there is the need for collective efforts towards nipping insecurity in bud in Nigeria. This will in turn give the farmers and other artisans a breeding space and to engage their activities without fear of banditry, kidnapping, herdsmen attack and other forms of criminalities preventing militating against Nigerian State. If this is done, the roadmap to food security will be surely short. The above will promote better standard of living and will in turn enhance access to justice in Nigeria.

It is germane to stress that provision to access to justice remains worthless to a man that cannot approach court due to his inability to source fund to file a court process as a result of high cost of filing. Access to justice must go in hand with affordable cost of filing fees. For this purpose, this paper advocates for downward review of filing fees of court processes in various jurisdictions of Nigerian courts.

It is also recommended that the National Assembly should as a matter of urgency enact law for the purpose of providing trust fund for the assistance of the indigents in litigation processes. All these became imperative in the light of vigorous global campaign for respect to human rights.

The respect for a nation in the comity of nations flows from how that treats her citizens. If Nigeria wants to remain relevant in the comity of nations, efforts should be made to whittle-down obstacles to access to justice. Poverty must be urgently given red card. Nigeria must strike poverty hard before poverty strikes her out of shape. It is beyond doubt that Nigeria already has strong pillars in all the geopolitical

³⁵ D McQuoid-Mason, ‘Access to Justice in South Africa, Are there Enough Lawyers?’ *Onati Social-Legal Series*, 561-579.

zones. What is required now is to link the pillars to build a solid foundation for sustainable economy. The time to act is now.