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COMPULSORY LAND ACQUISITION AND LIMITATION LAWS: PAYMENT OF COMPENSATION IN NIGERIA — A LEGAL ANALYSIS

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ABSTRACT

This paper critically examines the intersection between compulsory land acquisition, the constitutional right to compensation, and statutes of limitation in Nigeria. While section 44(1)(a) of the Constitution of the Federal Republic of Nigeria 1999 (as amended) guarantees prompt payment of compensation and access to a court or tribunal, the Land Use Act — the principal legislation regulating compulsory acquisition and compensation — does not prescribe a general limitation period for compensation claims. This silence creates significant legal uncertainty: affected landowners may possess a constitutionally recognised entitlement to compensation yet lose the practical ability to enforce it once an applicable limitation period expires. The paper interrogates whether the State should be permitted to rely on limitation defences where the obligation to compensate arises from its own compulsory acquisition. Adopting a doctrinal and comparative methodology, with particular attention to Lagos and Rivers State limitation laws, the Federal Capital Territory framework, and comparative perspectives from India and Kenya, the paper identifies a protection gap in the current legal regime. It argues for clearer statutory rules governing accrual and limitation, stronger procedural safeguards, and a more purposive constitutional approach to compensation claims. The paper concludes that the finality rationale of limitation laws must be reconciled with meaningful protection of property and compensation rights.

KEYWORDS: compulsory acquisition, compensation, limitation of actions, property rights, Land Use Act, Nigeria, comparative law.

1. INTRODUCTION

The Constitution of the Federal Republic of Nigeria 1999 (as amended) protects the right to acquire and own immovable property.[1] This protection is not absolute. Compulsory acquisition permits the State to take private interests in land without the owner's consent, ordinarily for overriding public purposes.[2] Such power, however, is constitutionally conditioned. Section 44(1)(a) requires prompt payment of compensation and access to a court or tribunal for the determination of the owner's interest and the amount of compensation payable.[3]

The Land Use Act remains the principal legislation regulating compulsory acquisition and compensation in Nigeria.[4] Sections 28 and 29 of the Act empower the Governor to revoke a right of occupancy for overriding public interest and impose an obligation to pay compensation for the value of the right of occupancy and for unexhausted improvements.[5] Yet the Act does not expressly provide a general limitation period for compensation claims.[6] This omission generates a central tension between public acquisition, constitutional property rights, and limitation statutes.

The practical consequence is that a landowner may hold a meritorious constitutional claim but face a limitation defence that renders the claim unenforceable. As the Supreme Court held in Mrs. Comfort Olufunmilayo Asaboro & Anor v Pan Ocean Oil Corporation Nigeria Ltd & Anor,[7] in the absence of an express statutory exclusion, claims arising under federal legislation remain subject to applicable State limitation laws.[8] This paper critically analyses that tension and proposes reforms to align limitation law with constitutional guarantees.

2. Statement of the Problem

Affected landowners may possess a constitutional right to compensation but lose access to judicial enforcement after a limitation period expires. The Land Use Act provides for compensation but does not itself prescribe a general limitation period for compensation

[1] Constitution of the Federal Republic of Nigeria 1999 (as amended), s 43.
[2] Land Use Act 1978, Cap L5, Laws of the Federation of Nigeria 2004, s 28.
[3] Constitution of the Federal Republic of Nigeria 1999 (as amended), s 44(1)(a)–(b).
[4] Land Use Act 1978.
[5] Ibid ss 28–29.
[6] Asaboro v Pan Ocean Oil Corporation Nigeria Ltd (2017) 7 NWLR (Pt. 1563) 42.
[7] Ibid.
[8] *Ibid*.

claims.[9] Consequently, State limitation laws may operate as procedural barriers to otherwise meritorious claims.[10]

The key question is whether the State should be allowed to rely on limitation where the obligation to compensate arose from its own compulsory acquisition. Beneath this question lies a deeper concern: the protection of property rights versus finality in litigation. The law must balance the legitimate interest in preventing stale claims with the constitutional promise that compensation will be paid promptly and fairly.[11]

3. Research Questions, Aim and Scope

The paper addresses three principal research questions:

1. Is it fair for the State to rely on limitation against a compensation claim arising from compulsory acquisition?
2. How do limitation statutes affect property and compensation rights in Nigeria?
3. What procedural and statutory reforms can better protect affected citizens?

The aim of the study is to critically analyse compulsory acquisition and the effects of limitation laws on compensation. Its scope is Nigeria, with particular attention to Lagos and Rivers State limitation laws and the Federal Capital Territory framework. India and Kenya provide comparative perspectives.[12] Methodologically, the paper adopts a doctrinal legal approach, supplemented by comparative and evaluative analysis.

4. Conceptual and Theoretical Framework

Compulsory acquisition refers to the State's acquisition of private interests in land without the owner's consent, ordinarily for public benefit.[13] A statute of limitation is legislation prescribing a time limit for commencing civil proceedings.[14] Compensation means payment intended to address loss resulting from compulsory acquisition, including relevant improvements, lost earnings, and displacement.[15]

[9] Land Use Act 1978, ss 28–29.
[10] Ikosi Industries Limited v Lagos State Government & Ors (2017).
[11] Aremo II v Adekanye (2004) 13 NWLR (Pt. 891) 572.
[12] Constitution of India, Article 300A; Constitution of Kenya 2010, Article 40.
[13] Umeh, JA, Compulsory Acquisition of Land and Compensation in Nigeria (Sweet & Maxwell 1973).
[14] Limitation Law, Cap L7, Vol. 5, Laws of Lagos State, s 16(2)(a).
[15] Land Use Act 1978, s 29.

The paper draws on three theoretical perspectives: social contract theory, realist legal theory, and positive law.[16] These perspectives illuminate the normative tension between public interest and governmental power, on the one hand, and private property and access to justice, on the other.[17]

5. Legal and Institutional Framework

5.1 Constitutional Framework

Section 43 of the Constitution guarantees every citizen the right to acquire and own immovable property anywhere in Nigeria.[18] Section 44(1) prohibits the compulsory taking of possession of any interest in immovable property except in the manner and for the purposes prescribed by a law that, among other things, requires the prompt payment of compensation and gives to any person claiming such compensation a right of access to a court of law or tribunal for the determination of his interest and the amount of compensation.[19] Notably, section 44(2)(i) expressly preserves general laws "relating to limitation of actions,"[20] a provision that has significant implications for the interaction between constitutional compensation rights and limitation defences.[21]

5.2 Statutory Framework

The Land Use Act 1978, Cap L5, Laws of the Federation of Nigeria 2004, remains the principal legislation.[22] Sections 28 and 29 govern the revocation of rights of occupancy for overriding public interest and the payment of compensation.[23] Section 29(4) prescribes the method of assessment, providing that compensation for land shall be an amount equal to the rent paid by the occupier during the year in which the right of occupancy was revoked.[24] Other relevant frameworks include the Petroleum Act, the Minerals and Mining Act, and the Federal Capital Territory Act.[25]

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[16] Generally Wigwe, CC, 'Compulsory Acquisition and Compensation in Nigeria: Issues and Challenges' (2013) Nigerian Journal of Property Law 55.

[17] *Ibid.*

[18] Constitution of the Federal Republic of Nigeria 1999 (as amended), s 43.

[19] *Ibid* s 44(1)(a)–(b).

[20] *Ibid* s 44(2)(i).

[21] Aremo II v Adekanye (2004) 13 NWLR (Pt. 891) 572.

[22] Land Use Act 1978.

[23] *Ibid* ss 28–29.

[24] *Ibid* s 29(4).

[25] Petroleum Act, Cap P10, Laws of the Federation of Nigeria 2004; Minerals and Mining Act 2007; Federal Capital Territory Act.

5.3 International and Regional Instruments

International and regional instruments relevant to compensation and property rights include the Universal Declaration of Human Rights, the African Charter on Human and Peoples' Rights, the United Nations Declaration on the Rights of Indigenous Peoples, and ILO Convention No. 169.[26]

5.4 Institutional Framework

The relevant institutions include Ministries of Lands and Survey, Land Use and Allocation Committees, traditional institutions, law-enforcement agencies, and the Judiciary.[27]

6. Limitation Laws and Compensation Claims

6.1 Purpose and Nature of Limitation Laws

Limitation laws serve important purposes: they encourage diligence, prevent stale claims, and avoid indefinite exposure to litigation.[28] In Aremo II v Adekanye,[29] the Supreme Court per Edozie JSC identified the rationale for statutes of limitation as including the prevention of stale claims and the protection of defendants from indefinite exposure to litigation.[30] The Court further held that where there has been a continuance of damage, a fresh cause of action arises from time to time, as often as damage is caused.[31] In Asaboro v Pan Ocean Oil Corporation Nigeria Ltd,[32] the Supreme Court held that the absence of an express exclusion of limitation laws in federal legislation means that applicable State limitation laws apply to statutory compensation claims.[33]

6.2 The Procedural Character of Limitation

Limitation laws are primarily procedural in nature.[34] They may prevent enforcement in court without necessarily creating or destroying the underlying substantive right.[35] However, the practical effect can be severe where a compensation claim becomes statute-barred. As the

[26] Universal Declaration of Human Rights 1948; African Charter on Human and Peoples' Rights; United Nations Declaration on the Rights of Indigenous Peoples 2007; ILO Convention No. 169.
[27] Generally Utuama, AA (ed), Critical Issues in Nigerian Property Law (Malthouse Press 2016).
[28] Aremo II v Adekanye (2004) 13 NWLR (Pt. 891) 572 at 592–593.
[29] *Ibid.*
[30] *Ibid.*
[31] *Ibid.*
[32] Asaboro v Pan Ocean Oil Corporation Nigeria Ltd (2017) 7 NWLR (Pt. 1563) 42.
[33] *Ibid.*
[34] Limitation Law, Cap L7, Vol. 5, Laws of Lagos State.
[35] Federal Housing Authority v HRM Oba Isaac Owolabi Olayemi & Ors (2017).

Court of Appeal held in Ikosi Industries Limited v Lagos State Government & Ors,[36] once a matter is statute-barred, the right to sue for the cause of action becomes extinguished automatically by the operation of the relevant limitation law.[37] In such a situation, a party who otherwise had a cause of action loses such right of enforcement and is left with a barren or empty cause of action that cannot be ventilated through the judicial process.[38]

6.3 Limitation Periods in Lagos and Rivers States

The Limitation Law of Lagos State, Cap L7, Vol. 5, Laws of Lagos State, provides in section 16(2)(a) for a limitation period of twelve years in actions for recovery of land.[39] In Ikosi Industries Limited v Lagos State Government & Ors,[40] the court applied this twelve-year period to a compensation claim arising from compulsory acquisition, holding that the action was statute-barred.[41] The appellant's cause of action was the compulsory acquisition of its land by the 1st Respondent, notice of which the appellant knew in June 1973.[42] The 1st Respondent ignored the appellant's letter of July 28, 1973, for compensation and refused to pay the compensation despite demands up to the time of filing the action.[43] The cause of action therefore arose in 1973 when the 1st Respondent compulsorily acquired the land in dispute.[44]

The Limitation Law of Rivers State, Cap 80 of 1999, provides in section 16 that no action founded on contract, tort, or any other action not specifically provided for shall be brought after the expiration of five years from the date on which the cause of action accrued.[45] In SPDC v West,[46] the Court of Appeal held that the Rivers State Limitation Law was binding on all courts within the territorial area of that State and applied to a claim commenced in the Federal High Court.

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[36] Ikosi Industries Limited v Lagos State Government & Ors (2017).
[37] *Ibid.*
[38] *Ibid.*
[39] Limitation Law, Cap L7, Vol. 5, Laws of Lagos State, s 16(2)(a).
[40] Ikosi Industries Limited v Lagos State Government & Ors (2017).
[41] *Ibid.*
[42] *Ibid.*
[43] *Ibid.*
[44] *Ibid.*
[45] Limitation Law of Rivers State, Cap 80 of 1999, s 16.
[46] SPDC v West (2018) LPELR-44290.

6.4 The Public Lands Acquisition (Miscellaneous) Act

The Public Lands Acquisition (Miscellaneous) Act previously provided a 12-year period for certain land compensation claims.[47] The Land Use Act, however, does not expressly provide a general time limit for compensation claims.[48] This makes the interaction between the Act and applicable limitation regimes a key legal issue.[49]

7. Key Judicial and Legal Issues

7.1 Relevant Case Law

The paper considers several judicial authorities. In Egbe v Adefarasin,[50] the Supreme Court considered the meaning of "cause of action" in the context of limitation.[51] In Alhaji Musa v Kwara State Government,[52] the Court of Appeal addressed limitation issues in the context of land compensation. In Akere & Ors v The Governor of Oyo State & Ors,[53] the Supreme Court per Ngwuta JSC emphasised that the over-riding importance of jurisdiction cannot be overstated, and that it is the life blood of any litigation before a court properly so-called.[54] The Court further held that when a court has no jurisdiction, any action taken by that court will be a nullity notwithstanding the fact that the proceeding was well conducted.[55] In Asaboro v Pan Ocean Oil Corporation Nigeria Ltd,[56] the Supreme Court held that the absence of an express exclusion of limitation laws in the Petroleum Act meant that the Limitation Law of Rivers State applied to compensation claims.[57]

7.2 Key Legal Issues

A major issue remains: can a limitation defence defeat a constitutionally protected compensation entitlement arising from compulsory acquisition? The study also examines access to court, fair hearing, and the Fundamental Rights (Enforcement Procedure) Rules.[58]

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[47] Public Lands Acquisition (Miscellaneous) Act.
[48] Land Use Act 1978.
[49] Asaboro v Pan Ocean Oil Corporation Nigeria Ltd (2017) 7 NWLR (Pt. 1563) 42.
[50] Egbe v Adefarasin (1987) 1 NWLR (Pt. 47) 1
[51] *Ibid.*
[52] Alhaji Musa v Kwara State Government (Unreported).
[53] Akere & Ors v The Governor of Oyo State & Ors (2012) LPELR-7806 (SC).
[54] *Ibid.*
[55] *Ibid.*
[56] Asaboro v Pan Ocean Oil Corporation Nigeria Ltd (2017) 7 NWLR (Pt. 1563) 42.
[57] *Ibid.*
[58] Fundamental Rights (Enforcement Procedure) Rules 2009.

The jurisprudence reflects the importance of limitation, diligence, and the enforceability of compensation claims.[59]

8. Compensation Principles and Valuation

8.1 Principles of Compensation

Compensation should be guided by the following principles:

- Equivalence: compensation should broadly correspond to the loss suffered.[60]
- Flexibility: valuation should respond to the character and circumstances of the affected property and loss.[61]
- Balancing of interests: public development must be reconciled with affected persons' rights.[62]
- Fairness and transparency: these are essential to legitimate acquisition.[63]

8.2 Valuation Models

Valuation models include the sales comparison approach, the income approach, and the replacement cost approach.[64] The wider objective is the restoration of the affected person toward the pre-acquisition position.[65] It is noteworthy that the Land Use Act only provides for the payment of "compensation," which is not necessarily "adequate compensation."[66] The Act's method of assessment does not recognise the open market value of the property itself but is based on replacement cost of improvements and crops, and it ignores the value of the land.[67]

[59] Egbe v Adefarasin (1987) 1 NWLR (Pt. 47) 1.

[60] Udoekanem, NB and Adoga, DO, 'Impact of Inflation on Compensation for Crops and Economic Trees on Land Compulsorily Acquired for Public Purposes in Niger State of Nigeria' (2023) Journal of Agripreneurship and Sustainable Development 6(3).

[61] *Ibid.*

[62] Oladokun, TT, 'Improving Land Governance in Nigeria: The Case of Compulsory Acquisition and Compensation Practice' (2023) Journal of Civil Engineering and Architecture.

[63] *Ibid.*

[64] Tagliarino, N, Bununu, Y, Micheal, M, De Maria, M and Olusanmi, A, 'Compensation for Expropriated Community Farmland in Nigeria: An In-Depth Analysis of the Laws and Practices Related to Land Expropriation for the Lekki Free Trade Zone in Lagos' (2020) FAO AGRIS.

[65] *Ibid.*

[66] Land Use Act 1978, s 29(4).

[67] *Ibid.*

9. Comparative Perspectives

9.1 India

In India, Article 300A of the Constitution provides that no person shall be deprived of his property save by authority of law.[68] Although the right to property ceased to be a fundamental right after the 44th Constitutional Amendment in 1978, it remains a constitutional right.[69] The Supreme Court of India has consistently held that the power of compulsory acquisition is accompanied by a corresponding obligation to ensure that the owner receives just compensation through a fair and expeditious process.[70] The Court has also clarified that compensation alone is insufficient to validate a compulsory acquisition; the State must follow a fair and transparent procedure established by law.[71]

9.2 Kenya

Article 40(3) of the Constitution of Kenya permits deprivation of property solely for a public purpose or in the public interest, and only upon prompt payment in full of just compensation.[72] The Land Act 2012, Part VIII (sections 107–133), governs compulsory acquisition.[73] Section 111 of the Land Act provides for prompt payment of compensation when land is compulsorily acquired.[74] In Susan Kakai v Ministry of Co-operative Development & 2 Others,[75] the court held that there is no limitation of time within which a constitutional petition for compensation can be filed.[76] The court relied on the principle that unless expressly stated in the Constitution, the period of Limitation of Actions Act does not apply to violation of rights and freedoms guaranteed in the Constitution.[77] The law concerning limitation of actions cannot be used to shield the State or any person from claims of enforcement of fundamental rights and freedoms protected under the Bill of Rights.[78]

[68] Constitution of India, Article 300A.
[69] Compulsory Acquisition under Article 300A: The Seven-Test Framework (Lexology, 6 July 2026).
[70] Indian Kanoon, Supreme Court Interpretation of Article 300A.
[71] Compulsory Acquisition under Article 300A: The Seven-Test Framework (Lexology, 6 July 2026).
[72] Constitution of Kenya 2010, Article 40(3).
[73] Land Act 2012 (Kenya), Part VIII, ss 107–133.
[74] Land Act 2012 (Kenya), s 111.
[75] Susan Kakai v Ministry of Co-operative Development & 2 Others [2020] KEELC 694 (KLR).
[76] *Ibid.*
[77] Chief Land Registrar & 4 Others v Nathan Tirop Koech & 4 Others CA Civil Appeal No 51 and 58 of 2016 [2018 KLR].
[78] *Ibid.*

10. Key Findings

1. Limitation statutes can make constitutionally recognised compensation rights practically unenforceable after the prescribed period.[79]
2. The interaction between acquisition, compensation, and limitation creates a significant protection gap.[80]
3. The absence of a general limitation provision in the Land Use Act leaves important questions to applicable regimes and judicial interpretation.[81]

11. Recommendations and Conclusion

1. Reconsider the application of ordinary limitation rules to compulsory-acquisition compensation claims.[82]
2. Strengthen procedural protection by improving transparency, valuation, consultation, and timely payment.[83]
3. Develop clearer statutory rules governing the accrual and limitation of compensation claims.[84]
4. Adopt a purposive constitutional interpretation that prioritises the protective purpose of section 44(1)(a).[85]
5. Incorporate comparative best practices from India and Kenya where relevant.[86]

CONCLUSION

This paper has shown that limitation laws, though procedurally legitimate, can undermine the constitutional promise of compensation in compulsory acquisition. The law must reconcile the finality of litigation with meaningful constitutional protection of property and compensation rights. Without clearer statutory guidance and stronger procedural safeguards, affected landowners may continue to suffer a protection gap that weakens public confidence in the compulsory acquisition regime.

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[79] Ikosi Industries Limited v Lagos State Government & Ors (2017).

[80] Asaboro v Pan Ocean Oil Corporation Nigeria Ltd (2017) 7 NWLR (Pt. 1563) 42.

[81] Land Use Act 1978.

[82] Generally Wigwe, CC, 'Compulsory Acquisition and Compensation in Nigeria: Issues and Challenges' (2013) Nigerian Journal of Property Law 55.

[83] *Ibid.*

[84] *Ibid.*

[85] Constitution of the Federal Republic of Nigeria 1999 (as amended), s 44(1)(a).

[86] Constitution of India, Article 300A; Constitution of Kenya 2010, Article 40

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