

PENINSULA DISPUTE BETWEEN CAMEROON AND NIGERIA

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Abstract

The study revisited the judgment of the International Court of Justice (ICJ) on the boundary dispute between Cameroon and Nigeria involving Bakassi Peninsula and efforts by the two nations to ensure its full implementation. The methodology included certain normative theories and principles using primary and secondary sources of information.. Data obtained were subjected to content and contextual analyses. It found that the ICJ judgment of 10 October, 2002 ceding Bakassi to Cameroon was initially unacceptable to Nigeria. Despite the Green Tree Agreement and Cameroon-Nigeria Mixed Commission established for implementing the Judgment, agitations by Nigerians for its revision and violence in the Peninsula had persisted- Though Nigeria and Cameroon had restrained from war, the Judgment had not resolved the dispute completely, Effective implementation of the judgment would depend upon workable strategies between Nigeria and Cameroon for addressing humanitarian needs, demarcation problems, intermittent violence and human rights violation in the peninsula.

Keywords: Bakassi Peninsula, Cameroon, ICJ, Implementing, Judgment, Nigeria.

Introduction

Historically, the 19th century scramble for Africa by European imperial powers encapsulated in the Berlin Conferences between 1884 and 1885 gave countries like Britain, France, Belgium, Germany, Portugal and Spain; the colonial audacity to divide African countries among themselves. The development led to the coercive lumping of African territories and arbitrarily drawing and partitioning their borders or frontiers (Ajoino 1994). This had resulted into boundary dispute among many nations like those between Ethiopia and Eritrea; Libya and Chad; Egypt and Sudan: South Africa and Namibia and lately, Nigeria and Cameroon. (Erne, 2003).

The land and maritime boundary dispute between Cameroon and Nigeria seriously became a source of concern in 1981 when it was reported that some Cameroonian soldiers launched sporadic attacks on Nigerians living in the Bakassi Peninsula (The Comet.2002.P.5). Nigerian Government at that time was observing not intending to embark on any act of reprisal but took step to deploy light Military personnel to keep peace in the area. Unfortunately, reports of intermittent incidents of violence and hostilities between citizens of the two countries over the Peninsula had continued to dominate both print and electronic media. Also, the growing awareness of huge deposits of crude oil in the Bakassi Peninsula with its inestimable economic value, had further rekindled the interest of the Republic of Cameroon in the area and her desperate bid to recover the property. Hence, the Cameroonian Government decided to file action against Nigeria at the ICJ, on 29 March, 1994 (*Cameroon. V. Nigeria: Equatorial Guinea Intervening*, 1CJ/10 Oct., 2002).

After some years of legal battle, the ICJ gave its judgment on 10 October 2002, ceding Bakassi Peninsula to Cameroon. In view of the socio-economic, cultural, political and security implications of the judgment; many Nigerians had intensified their support for a revision of the ICJ judgment. In fact, the two Houses of the National Assembly in Nigeria came up with resolutions early October 2012, calling the Federal Government to approach the ICJ for a revision of the judgment (The Nation, 2012, P.I). However, the Federal government of Nigeria indicated its intention on 9th October, 2012 (barely 24 hours before the deadline), not to appeal for a revision of the ICJ judgment.

Giving the geographical locations of the Peninsula, the age-long occupation of some Nigerians on the island and snippets of documentary evidence; was the ICJ judgment given in error? Was the intervention of the ICJ capable of resolving the Bakassi crisis? What factors motivated the Federal Government of Nigeria to drop its intention to appeal for a revision of the judgment? Could Nigeria have succeeded in seeking a revision of the judgment? Why are the displaced "Nigerians still agitating for durable resettlement schemes and still uncomfortable with the refusal of the Federal Government to appeal for a revision of the judgment? What should Cameroon and Nigeria do to ensure a full implementation of the ICJ judgment and make the Peninsula a peaceful buffer area between them forever?

Objectives of the Study

The overall objective of this study is to further advance the frontiers of knowledge of scholars who have written and made public pronouncements about the intervention of the ICJ in the land and maritime boundary dispute between Cameroon and Nigeria. The study also aims at assessing the legal and policy framework of some institutions like the Green Tree Agreement and the Cameroon - Nigeria Mixed Commission to enforce the decision of the ICJ and the extent to which the ICJ decision had resolved the land and maritime dispute.

Conceptualization

1. The Word Implementation

The word "implementation" has been explained as a detailed outline of steps, procedures, processes and devices needed to achieve a goal (Bryan, 2004). In the context of this study, "implementation" refers to all conceivable efforts, steps, procedures and actions needed by both Cameroon and Nigeria to carry into full effect, the ICJ ruling as enunciated in the Green Tree Agreement and the framework of Cameroon-Nigeria Mixed Commission.

2. The ICJ Judgment

"Decisions, Rulings and Judgments" are words often used in place of one another in both constitutional and statutory interpretations. In legal parlance, a decision or a ruling is a judicial determination after consideration of the facts and the law. It is usually a holding, order or judgment pronounced by a court or tribunal when considering or disposing of a case. (Garner, 2004). On the other hand, a judgment is a court's final determination of the rights and obligations of the parties in a case. It also includes an equitable decree and any order from which appeal lies. (Boleslaw, 2005). With regards to the intervention of the ICJ on land and maritime boundary dispute between Cameroon and Nigeria, the nature of the judgment may be regarded as reviewable since the ICJ statute (Article. 61) provides an opportunity for any aggrieved party to a case before it to apply for a revision or review of the judgment emanating from it. It is on the strength of this statutory provision that many Nigerians especially those living in the Bakassi Peninsula, had agitated for a revision of the judgment by the Federal Government of Nigeria.

There are explicit provisions in the statute of the International Court of Justice (Articles, 27-61) governing the status, procedure, pronouncement, enforcement and potency of its judgment. For instance, a judgment given by any of the Chambers of ICJ is considered being rendered by the Court; any of the judges has the right to deliver a separate opinion where a judgment does not represent a unanimous opinion; A judgment must be signed by the ICJ President and the Registrar and shall be read in the open court before parties: The ICJ decision has no binding force except between parties; The judgment is final and without appeal but an application for revision of a judgment may be made by any of the parties before the ICJ. Even though the ICJ judgment has no binding force except between parties, parties appearing **before the Court for a dispute** and who are signatory to its statute should be **deemed to have voluntarily** submitted to its jurisdiction (Article,36) *Ipsa Facto*, they have a corresponding obligation to abide by its decision constructively, this provision also means that once the ICJ gives a ruling, it should be the duty of parties to work out strategies between them for its implementation.

3. Cameroon and Nigeria

The Republic of Cameroon is a country lying at the junction of Western and Central Africa. The capital is Yaounde. It faces the Gulf of Guinea to the South-West and bordered by Nigeria to the North-west, Chad to the North-East, the Central African Republic to the East and the Republics of Congo, Gabon and Equatorial Guinea to the South. Cameroon got her independence from France in 1960. The country runs a Unitary Republic and a unicameral National Assembly with a strong presidential system of government. Around 1884, Germany extended its protectorate over Cameroon until 1919 when France and Britain forced Germany out of the nation. In 1922, the League of Nations conferred mandates on Britain and France for the administration of North and Southern parts of Cameroon. In 1946, the mandate was renewed as the United Nations Trusteeship. After independence in 1960,

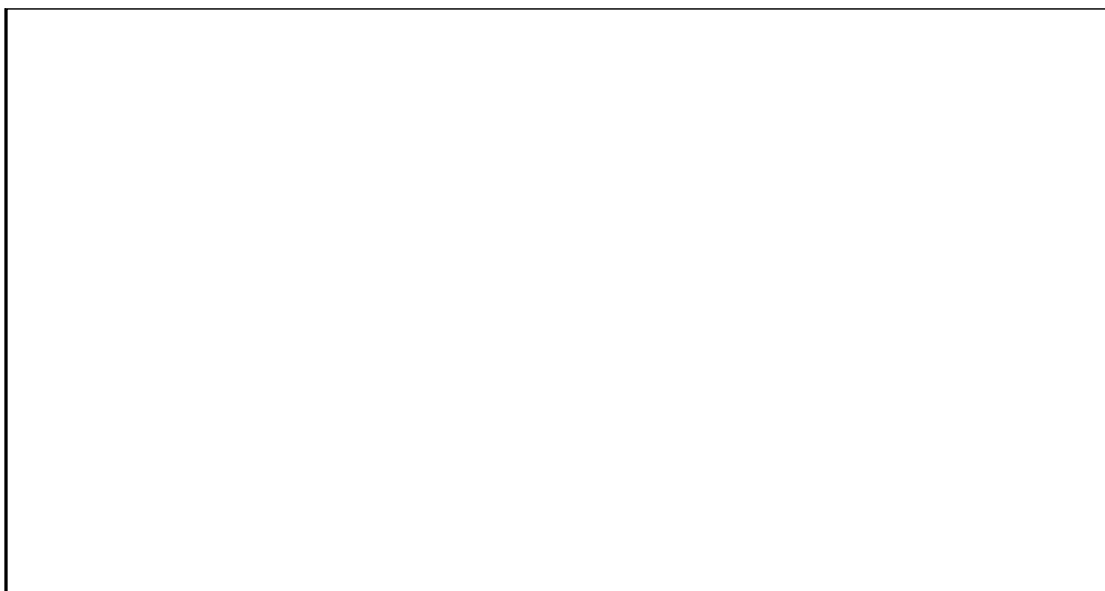
Cameroon joined as a member of the United Nations Organization (UNO). In 1961, the Southern pan of Cameroon voted in a Plebiscite conducted by the UNO to join new Federal Republic of Cameroon while the Northern part voted to join Nigeria (Britannica, 2005, P.768).

The Federal Republic of Nigeria on the other hand, is situated on the Southern Coast of West Africa extending about 1,050 kilometers from North to South and about 1,130 kilometers East to West making approximately, about 923,768 square kilometers in area, Nigeria is the most populous African nation. It faces the Bight of Benin (South-west) and the Bight of Biafra (South-East), both in the Gulf of Guinea. Nigeria is bordered by Niger on the North, Lake Chad on the North-East, Cameroon on the East and Benin Republic on the West.

The capital city is Abuja. Official British Control of Nigeria began with the annexation of Lagos in 1861 while the country was established as a separate British colony in 1886. Both the North and Southern protectorates were amalgamated by Lord Lugard in 1914 while in 1960, Nigeria got her independence from Great Britain. As at 2016, the country ran a presidential system of Government, with a unicameral legislature at the State and a bicameral legislature at the Federal level (Britannica, 2005).

In terms of geographical locations, Cameroon and Nigeria fall within the West African belt of the African Continent (Britannica 2005). The two nations share common land and maritime boundaries. They have been playing significant roles in the socio-economic, cultural, political, security and diplomatic cohesion of West Africa and Africa as a whole. Apart from sharing some peculiar features of colonial heritage, the tie of diplomatic relations between the two nations became noticeable through the assistance of Cameroon to Nigeria during the 1967 to 1970 Nigerian civil war. It was reported that the Republic of Cameroon granted the request of Nigeria to block the passage of Biafran rebel soldiers through the Bakassi Peninsula to Nigeria; the island which later became the subject of dispute, between the two nations.

4. Overview Of The History And Geography Of The Bakassi Peninsula



As seen in figure 1, Bakassi is a Peninsula located in the Gulf of Guinea within the Atlantic Ocean extending from the Southern part of Cameroon and overlooking Cross Rivers State in the South-Eastern corner of Nigeria. It is a stretch of land between the North and

South Western part of Cameroon and North and South-Eastern part of Nigeria. It had been populated for over one hundred years by the Efut, Efik, Ibibio and Annang tribes of Cross Rivers and Akwa Ibom States of Nigeria totaling about 300,000 people (Onukwube. 2012). The area is a network of rivulets making the people mostly fishermen while others thrive on root-crops farming. It is situated at the extreme eastern end of the Gulf of Guinea where the warm east-flowing Guinea Current meets the cold north-flowing Benguela Current. These two great currents of the Atlantic Ocean interact thereby, creating huge foamy breakers, which constantly advance towards the shore and building submarine shoals very rich in fish, shrimps, crabs and other forms of aquatic lives and non-living things. The fertility of the Bakassi Peninsula is comparable to Newfoundland in North America and Scandinavia in Western Europe (Wikipedia, 2012). The Peninsula is commonly described as "oil rich"⁷ arousing considerable interest from about eight multinational oil companies which have participated in the exploration of the Peninsula and its offshore waters.

During the European scramble for Africa, Queen Victoria was alleged to have signed a Treaty of Protection with the King and Chiefs of the old Calabar (people of Nigeria who first settled in the Bakassi Peninsula) on September 10, 1884, (Ajoino, 1994). The treaty enabled Great Britain to exercise control over the entire territory of Calabar-South Eastern Corner of Nigeria including the Peninsula. Geographically, the Bakassi Peninsula is shared by Cross Rivers, Borno, Taraba and Adamawa States of Nigeria along the North-Southern part of Cameroon. By November, 1893, the British Government and the German Government defined their boundaries and ceded the present day Bakassi Peninsula to Cameroon. The Treaty of 10 September 1884 was a protectorate Treaty only to protect the people of Calabar which Bakassi was a part of against other imperialists. According to the Trusteeship principle, the British was merely holding and administering the Peninsula in trust via indirect rule. However, there was another Treaty in 1894 between Britain and Germany which ceded the Peninsula to Germany without the consent, of the people living in the area (Bolaji, 2012). Cameroon got her independence in 1960 and when the UNO Trusteeship ended. Bakassi was returned to France. There were so many Treaties between 1913 and 1961 among Germany, France, Britain, Cameroon and Nigeria over the ownership of the Peninsula.

In 1914, Lord Lugard brought about the Amalgamation of the North and Southern Protectorates of Nigeria, The colonial government drew out the map of Nigeria reflecting the 1913 Treaty between Britain and Germany. In that map, Bakassi Peninsula was never part of Nigeria. This map was tendered by Cameroon before the ICJ to indicate that when Nigeria first assumed nationhood in 1914 Bakassi Peninsula was not part of her territory. In 1961 the Southern part of Cameroon voted in a plebiscite conducted by the UNO to join new Federal Republic of Cameroon while the Northern part voted to join Nigeria (Britannica. 2005). The Deputy Surveyor General of Nigeria at that time was a Cameroonian and when he was going back to Cameroon he took the map of Nigeria reflecting the 1913 position along. The Government of Cameroon, haven been convinced that Bakassi Peninsula belongs to it started redrawing the map to say it wanted back the Peninsula (Robert, 2012).

The Nigerian civil war was fought between 1967 and 1970. Shortly after the war and between 1972 and 1975, Nigerian government began to experience a very strong demand from Cameroon to reclaim Bakassi Peninsula. In order to avoid fighting another international war, the Nigerian Military Head of State then, General Yakubu Gowon, entered into the 1975 Maroua Declaration with the President of Cameroon by drawing an imaginary line on a map to divide Bakassi Peninsula into two from North to South. Cameroon was to hold on to the part next to its territory while Nigeria was to hold on to the other part pending the time when the actual boundary between the two nations would be drawn (Oyebode, 2012). This was the position till

the onset of the Nigerian First Republic in 1981 when some Nigerian soldiers were reported to have been *killed by the Gendarmes* of Cameroon in the wake of a renewed hostility between the two nations over the Peninsula (Tayo, 2002). The hostilities continued in a staccato manner until March 29, 1994 when Cameroon dragged the Federal Republic of Nigeria to the ICJ,

Theoretical Framework and Research Methodology

In this study, attempts were made to gather ideas through certain normative theories and principles using primary and secondary sources from scholars who had done much on subjects of conflict resolution, state intervention, treaties, and cession of territory, concept of Justice, implementation of ICJ decisions, State responsibility and the individual. In particular, the following issues are in focus

1. Conflicts and Their Inevitable Nature

A conflict is a fight, battle, dispute or war. It is an antagonistic state or action between parties (Webster, 2006). In International Law, it is a state of open hostility between two nations or between a nation and an aggressive force (Brownlie, 2006). This typifies the current situation between Cameroon and Nigeria. In human affairs and state relations, competitive or opposing actions of incompatible are inevitable and that is why modern approaches to domestic and international conflicts are geared towards possible resolution or management. In the opinion of (Ottaway, 1999).

"The challenge for African countries, as for the rest of the world, is to accept the inevitability...of different national identities and to find way to manage conflicts arising there from."

2. Resolution of Conflicts through Interventions

Modern acts of resolving and managing conflicts, disputes, crises and wars between nations often involve certain types of intervention. Under Customary International Law and treaties, States are expected to be absolutely sovereign in their territories and so, any diplomatic, judicial or military interference in the affairs of one nation by another or other States and bodies must be with the consent of the State (UNO Declaration, 1970 Article 4).

3. Ownership Occupation and Cession of Territory via Treaties and Agreements

A legally procured treaty in International Law should be accompanied by certain conditions before it can be binding on parties involved. In relation to this case, the various treaties undertaken by colonial masters and their colonies ought to have been expressly assented to, by parties (Vienna Convention, 1969), while any of such treaties ought to have complied with the requirements of the municipal laws of the countries of the parties (Vienna Convention, Article 46). Some of the cardinal principles of property ownership include occupation and assertion of possession (Freeman, 1985). Available facts revealed that the Efiks and other tribes of South Eastern Corner of Nigeria known as the Calabar people had occupied and been in possession of the Bakassi Peninsula for over a period of one hundred years (Etim, 2012). A long period of occupation like this with empirical indications of physical development of a property or territory involved can go a long way to confirm assertion of ownership over such property. There were no properly documented judicial or administrative efforts on the part of Cameroon before the outbreak of the Nigerian Civil War in 1967 to convince Nigeria that Bakassi Peninsula belonged to Cameroon through a strong demand. This attitude would have amounted to acquiescence which is a person's tacit or passive acceptance or implied consent to an act (Bryan, 2004). In other words, for sleeping over an ownership or possessory right for over a period of one hundred years, Cameroon could be said to have tacitly accepted the ownership of the Bakassi Peninsula by Nigeria.

4. Principles of Self-Determination and State Responsibility

One very serious implication of the ICJ ruling is the displacement of about 300,000 people living in the Bakassi Peninsula, giving them no choice to assert their right to self-determination (Harris, 2004). The doctrine of State responsibility also imposes correlative obligation on Nigeria and Cameroon to rehabilitate the displaced people of the peninsula (John Locke and Jean Rousseau 1690.)

5. Implementation of ICJ Judgment and Ineffectiveness of International Law

Implementation of the ICJ ruling is another salient aspect of ensuring proper resolution of the dispute between Cameroon and Nigeria over Bakassi. Failure on the part of any party to comply without evidence of appeal is tantamount to judicial contempt punishable in law (Dangel, 1939). Unlike national courts, attitudes of State parties to judgments of ICJ and other international tribunals are often complacent and reluctant. This has to do with seeming ineffective nature of International Law from which ICJ and other international tribunals normally derive their legitimacy and authorities.

Highlights of the ICJ Judgment and Implementation Strategies-Cameroon V. Nigeria: Equatorial Guinea Intervening (ICJ/10 Oct,2002).

Presided over by Mr. Gilbert Guillaume, the ICJ gave its judgment on 10 October, 2002 composing the following main issues relevant to this study:

- I. The sovereignty over a sizeable portion of the Bakassi Peninsula meant to be properly demarcated later, lay with the Republic of Cameroon.
- II. Both Cameroon and Nigeria were under an obligation expeditiously and without condition, to withdraw their administration, military and police forces from portions of the Peninsula falling within the sovereignty and territorial jurisdiction of each other.
- III. The Republic of Cameroon should be faithful to its traditional policy of hospitality, tolerance and to continue to afford protection of Nigerians living in the Bakassi Peninsula and the Lake Chad Area.
- IV. The ICJ rejected all submissions and counter-claims of Cameroon and Nigeria regarding their respective State responsibility to each other on the matter.
- V. Between 2002 and 2006, there were much diplomatic and consular mediation between Cameroon and Nigeria aimed at establishing the Cameroon-Nigeria Mixed Commission in 2003 which was charged with the responsibility of demarcating the land and maritime boundaries, development of Joint economic projects between the two nations and demilitarisation of the Peninsula. The second was the Green-Tree Agreement which imposed obligations on Nigeria and Cameroon to recognize the sovereignty of each other over portions of the Peninsula ceded to each State by the ICJ.

Findings

The study found as follows:

- a) Cameroon and Nigerian governments consented to adopt peaceful means of resolving the dispute rather than the use of force through hostility and war.
- b) As at 1975, there had been incidents of violence leading to loss of lives and properties over the ownership of Bakassi Peninsula but the dispute further degenerated in 1981 when some Cameroonian soldiers were reported to have killed some Nigerian soldiers and civilians (The Cornet, 2002). International community especially nations around them had maintained the principle of noninterference as embedded in International Law (UNO Declaration, 1970).
- c) There were pieces of evidence to confirm that certain agreements between Great Britain, Germany, France, Cameroon and Nigeria between 1884 and 1861 to cede territories (Bakassi Peninsula inclusive) were encapsulated in certain treaties which did not follow traditional norms of International Law.
- d) There were sufficient indications that Nigerians had been occupying the Bakassi Peninsula before 1884 (Ajomo, 1994). A lot of farming, trading, commercial and other occupational activities had also been undertaken by Nigerians on the Peninsula. Why was it that Cameroon had allowed her property to be so neglected for an unbroken period of over One hundred years before she took concrete initiative after the Nigerian civil war in 1975. To reclaim the property? It could not be far from the truth if it is concluded that Cameroon acquiesced on her right of ownership.
- e) The ICJ ruling could be said to have been given by many of the judges who were not familiar with the geography, terrain and locations of the Bakassi Peninsula. The judgment was based on annotated maps, plans, description of locations of the Peninsula as well as other oral and documentary evidence presented before the ICJ. No attempt was made by judges to visit the *locus in quo* (actual place of the matter) to actually undertake an empirical confirmation of facts presented before them. The attempt would have been arduous, expensive and taskful, but it could have been rewardingly justiciable.
- f) There have been a wide range of complaints from the people who were displaced due to the ICJ judgment. One of such was that their right to self-determination had been violated since they were not given the opportunity to decide through a plebiscite, whether they had wanted to remain in the part of the Peninsula ceded to Cameroon as Cameroonians, retain their nationality while obeying the laws of Cameroon or accept to be relocated to other places in Nigeria as Nigerians. In view of the fact that the arguments of Cameroon and Nigeria were mutually exclusive on this issue and since the Court was more persuaded by the content of evidence justifying ownership of the Peninsula by Cameroon, the ICJ could not resolve this issue in favour of Nigeria.
- g) After a period of some years when the ICJ gave its ruling ceding Bakassi Peninsula to Cameroon, the Cameroon-Nigeria Mixed Commission was established in 2003- while the Green Tree Agreement was conceived in 2006 for the implementation violation of human rights had been rampant in the area (Hugo, 2012). The Nigerian Government had refused to appeal against the Judgment (Adoke, 2012) while corruption on the part of some individuals has also prevented a durable resettlement scheme. If Nigeria had been operating a workable Federalism, all the States affected by the Judgment would have been financially independent to complement the efforts of the Federal Government in providing basic infrastructure for the internally displaced indigenes of the Peninsula.

Conclusion and Recommendations.

In its geographical locations and physical identity, the Bakassi Peninsula will continue to remain an immovable land and maritime property contiguous to both Cameroon and Nigeria so long as the earth exists. The value of the Peninsula in terms of oil exploration, security, commerce, farming, transportation and other human activities cannot be underestimated in the Gulf of Guinea. In view of its strategic importance, neither Cameroon nor Nigeria will like to be careless again in protecting, preserving and securing those portions of the Peninsula ceded to it by the ICJ Judgment. While it is much gratifying to observe that the two nations had refrained from war in settling their boundary dispute, their joint and progressive efforts would have been more appreciated in implementing the ICJ ruling so as to further cement their long period of tradition of peace and diplomatic relations. The following recommendations are put forward:

- a) Nigeria and Cameroon should continue to uphold their commitment to abide by the judgment of the ICJ without reservation.
- b) All obligations imposed on Cameroon and Nigeria by the Green Tree Agreement should be discharged in good faith.
- c) Cameroon and Nigerian Governments should continue to monitor the activities of their military and police personnel deployed to maintain peace in the Peninsula.
- d) Authorities of the Cameroon-Nigeria -Mixed-Commission should further be provided with full powers and adequate tools to demarcate land and maritime boundaries between the two nations.
- e) All procedures relating to boundary demarcation between Cameroon and Nigeria should take account of steps necessary to be taken by every party in addressing the implications of the judgment. For instance, the Federal Government of Nigeria should further amend the 1999 Constitution by updating the location of the Bakassi Local Government Area now falling in the territory of Cameroon by virtue of the ICJ decisions.
- f) It was true that the UNO had commended Nigeria for not appealing the ICJ judgment over Bakassi (Vanguard, 2012). However, this decision did not confirm Nigeria's commitment to the implementation of the judgment. If profuse agitations for enduring resettlement policies by displaced people still persisted till October, 2016 (Fourteen years after the ruling), there could be justifiable ground to conclude that the judgment had not been practically implemented. Hence, Nigeria should address the burning issue of resettlement of displaced people by attending to the socio-economic, humanitarian and security needs of the people affected. These would have included: construction of roads, provision of housing, pipe-borne water, electricity, hospitals, finance and educational institutions as well as security agencies for the maintenance of law and order and for the protection of lives and properties in the portion of Bakassi territory ceded to Nigeria.

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