

City Reports on International Law: Lagos in focus

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1. Introduction

Lagos is an urban conurbation which transcends the geographic, constitutional and administrative boundaries introduced during the colonial and post-colonial eras. More so, as a megacity, commercial nerve centre and a constitutionally recognised second-tier government, Lagos occupies a unique position in the Nigerian Federation. Given this context, to fully appreciate the scope and unique nature of Lagos' interactions with international law, the analysis in this report will take into consideration the historical, legal, political and socio-economic contexts which have shaped the multi-dimensional character of Lagos both as a state and city.

2. The historical context of Lagos's interaction with international law

2.1. Lagos during the transatlantic slave trade

Tracing the origin of the Lagos or *Eko* as it is known to the indigenous population is beyond the scope of this report.¹ However, there have been pivotal developments after the enigmatic origins of this great West African city-state which have brought it into proximity with international law, prior to present-day Nigeria. Notably, it is vital to highlight the strategic position that the Kingdom of Lagos occupied during the transatlantic slave trade era and the subsequent efforts by the British Empire to end the trafficking of slaves along the coast of West Africa.

¹ There are several oral accounts of the origin of '*Eko*' the indigenous name of the city which has passed down for centuries, however, there is no consensus on the founders of this great kingdom on the West African coast. As to the origins of the present name 'Lagos', this is attributed to Portuguese merchants who traversed the coast of West Africa looking for new trading partners. See Kristin Mann, *Slavery and the Birth of an African City: Lagos, 1760–1900* (Bloomington IN: Indiana University Press, 2007) 27. See also H O H O Damole, 'Lagos History Lecture: Lagos yesterday, today and tomorrow' (2017) available at <https://lagosstate.gov.ng/blog/2017/05/25/lagos-history-lecture/> accessed 01 June 1, 2020. Alfred Moloney reporting in his notes about Lagos described it thus: 'The name Lagos is Portuguese, possibly from lago, a lake, as it looks like an island situate in a lake, but more probably from the seaport Lagos, in Portugal.' See Alfred Moloney, 'Notes on Yoruba and the Colony and Protectorate of Lagos, West Africa' (1890) 12(10) 596, at 599.

The transatlantic slave trade at its prime was a major facilitator of the interaction between the territory of Lagos and the global West.² The demand for slaves of African origin in Europe and the Americas, made Lagos, a strategic port city along the Bight of Benin.

In the context of international law's response to slavery and the slave trade, Lagos featured prominently in the equation in the 19th century. This is because the attitudes of major European powers, especially Great Britain towards the slave trade was changing at the time that this trade was becoming of crucial economic importance to the ruling hierarchy in Lagos. Great Britain in particular, which had a change of heart towards the morality and legality of slavery and the slave trade took up a prominent role in the campaign to curb the trade, which by the early 19th century was thriving along the coast of West Africa.³

The efforts of anti-slavery crusaders, chiefly Great Britain to put an end to the trafficking of slaves, were frustrated by the ambivalent nature of international law towards the legality of slavery and slave trading. Only several countries among the comity of nations, including Great Britain and the USA had abolished slave trading within their municipal laws. As such, the illegality of the slave trade was yet to gain the status of customary international law.⁴ A plethora of cases relating to intercepted slave-trading vessels originating from the west African coast decided in the early part of the 19th century in the USA and Britain respectively demonstrate the confusion on the position of international law towards the legality of the slave trade.⁵ Fischer, who carried out a detailed dissection of a number of these 19th-century cases decided in Britain argues that the legality or otherwise in international law of slave trading carried out on international waters was not clearly defined. Fischer further argues that capturing and searching vessels involved in the slave trade at that point in history was only justified in international law, '...provided slavery is prohibited by the laws of the flag of both vessels (the one capturing and the one captured...'⁶

² Kristin Mann, *supra note 1*, 1. Kristin points out that the slave trade '...brought the West and the territory the world now knows as Lagos into steady and intimate contact with one another.'

³ According to Mann '...soon after the commerce took root at Lagos in the late eighteenth century, a great shift in moral consciousness in the West led Britain, then the dominant power in the Atlantic world, to reconceptualize Europe's relationship with Africa and resolve to abolish the trade in human beings in the Bight of Benin, where Lagos is located, and elsewhere.' Kristin Mann, *supra note 1*, 2

⁴ H Fischer, 'The Suppression of Slavery in International Law.' *The International Law Quarterly* (1950) 3(1) 51, at 30-31.

⁵ To mention a few, in *Commonwealth v. Aves* (1836) 18 Pic. 193, it was decided per Shaw C.J. of Massachusetts that slavery was not contrary to international law, though contrary to natural law.

⁶ Fischer, *supra note 4*, at 34.

The ambiguity in international law towards the legality of the slave trade emanating from the coast of West Africa was one of several catalysts for Great Britain's less than an altruistic interest in Lagos.⁷ Undoubtedly, Great Britain's economic interests in palm oil grown in abundance in Lagos and across the Yoruba hinterland was another incentive that accelerated the intermeddling of Great Britain in the local affairs of the region. As Smith points out, *'the rift in the royal house of Lagos provided the British with a pre-text and an opportunity for their intervention there...'*⁸ Things came to a head in November 1851, when British gunboats led by John Beecroft the then British Consul stationed in west Africa tried to persuade Oba Kosoko to sign a treaty abolishing the slavery and slave trade in his territory.⁹ Upon his refusal to sign the Treaty, Lagos was bombarded by British naval forces. The British troops were initially repelled, but in a second attack in December of 1851, the city of Lagos was captured by the invading British forces.

2.2. The annexation of Lagos to the British empire: the use of treaties

The events from December 1851 onwards introduce another dimension of Lagos's interaction with international law. This is so because treaties were the preferred instrument of choice used by Great Britain to validate their violation of the territorial sovereignty of the West African kingdom.

A perusal of the Lagos Treaty of 1852 underscores a darker side in the evolution of international law. Although the Treaty's primary focus was to abolish slavery and the slave trade emanating from the kingdom of Lagos,¹⁰ the prohibitive terms of the treaty text and the conditions under which assent to the Treaty was acquired indicates the instrumentality of international law at that period in time to perpetuating imperialism in the 19th century. Olaniyan reports that to eradicate slavery from the West African region, the British government signed an estimated 65 agreements from 1841 to 1853 with African

⁷ William MacGregor the colonial governor of Lagos colony between 1899 -1904 in a report corroborates this assertion when he points out that 'Great Britain first came officially into contact with Lagos in connection with the slave trade. See William McGregor, 'Lagos, Abeokuta and the Alake' (1904) *Journal of the Royal African Society* 3(12) 464, at 464. Also, Kristin argues that 'in the longer term, Lagos's growth as a slave port led to its conquest and colonization by Great Britain, which by the mid-nineteenth century had extended its anti-slavery crusade to West Africa in the name of spreading civilization and promoting trade in new commodities, such as palm oil and later palm kernels.' See Kristin Mann, *supra note 1*, at 5.

⁸ Robert Smith, 'To the Palaver Islands: War and Diplomacy on the Lagos Lagoon in 1852-1854' (1969) *Journal of the Historical Society of Nigeria* 5 (1), 3 at 4.

⁹ *Ibid*, at 5.

¹⁰ Smith reports that 'The British claimed that their intervention at Lagos in 1851 and the establishment of their influence there were actuated by a determination to stamp out the slave trade of which Lagos was a center.' See Smith (1969) *supra note 8*, 6.

chiefs.¹¹ However, the events that followed demonstrated that these instruments of international law served a more imperialist aim.

Less than a decade after the coerced signing of the Lagos Treaty of 1852, Lagos was ‘formally’ annexed to the British empire via the instrumentality of another treaty – the 1861 Treaty of Cession. Article I of the Treaty reads thus:

In order that the Queen of England may be the better enabled to assist, defend, and protect the inhabitants of Lagos, and to put an end to the Slave Trade in this and the neighbouring counties, and to prevent the destructive wars so frequently undertaken by Dahomey and others for the capture of the slaves, I, Docemo, do, with the consent and advice of my Council, give, transfer, and by these presents grant and confirm unto the Queen of Great Britain, her heirs, and successors forever, the port and Island of Lagos with all the rights, profits, territories, and appurtenances whatsoever thereunto belonging, and as well the profits and revenue as the direct, full, and absolute dominion and sovereignty of the said port, island, and premises, with all royalties thereof, freely, fully and entirely and absolutely. I do also covenant and grant that the quiet and peaceable possession thereof shall with all possible speed, be freely and effectually delivered to the Queen of Great Britain, or such person as Her Majesty shall thereunto appoint for her use in the performance of this grant; the inhabitants of said island and territories, as the Queen’s subjects, and under her sovereignty, Crown, jurisdiction, and government, being still suffered to live there.¹²

The nature of the 1861 Lagos treaty of Cession is a pivotal moment in the history of international law for several reasons. First, the ‘acquisition’ of Lagos by Great Britain via a treaty signed under duress exemplifies the use of ‘gunboat diplomacy’ by imperial Britain in the 19th century to exert its geo-political dominance in the region.¹³ Second, the coerced treaty-making practices between European colonial powers and African rulers/elites in city-states such as Lagos laid the foundations for international law to subsequently define and construct ideas about sovereignty, property and debt which have persisted till present, albeit in re-constructed terms.¹⁴

¹¹ R Olaniyan, ‘British Imperial Politics and Diplomacy in West Africa, 1860-1865’, (1972) *The Historian*, 34(4) 650, at 653.

¹² Robert Smith, *The Lagos Consulate 1851-1861* (CA: University of California Press, 1979) 135–137 Appendix A. ISBN 9780520037465.

¹³ The period of British occupation of Lagos coincides with a tenure of Lord Palmerston as Foreign Secretary and Prime Minister when ‘British “gunboat diplomacy” had reached its apogee. See Thomas Johnson and Jonathan Gimblett, ‘From Gunboats to BITs Evolution of Modern International Investment Law’ in Karl Sauvant (ed) *Yearbook on International Investment Law & Policy 2010-2011* (Oxford: Oxford University Press, 2011) 649, at 652.

¹⁴ See generally Thomas Johnson and Jonathan Gimblett, *supra* note 14.

3. The legal context of Lagos's interaction with international law

Progressing to the status of Lagos in the post-colonial era, the city metamorphosed to fulfil several roles in the sovereign state – Nigeria, which gained independence in 1960. Situated in a post-colonial state, the interaction of Lagos with international law comes against the backdrop that Nigeria's constitutional configuration gives plenary powers to the central government to formulate, direct and coordinate the implementation of Nigeria's engagement with the international system. As such, the conventional domestic/international dichotomy in international law, in principle, dictates the interaction of Lagos (both as a state and city) with international law.

Notably, as the administrative seat of power for Nigeria during colonial times and after independence in 1960, up until 1991, Lagos played a symbolic role in the struggle for political and economic self-determination across the African continent.¹⁵ The interaction of Lagos with international law within this timeframe was more symbolic and passive. Several initiatives to emancipate Africa from colonial rule such as the 1980 Lagos Plan of Action (LPA) were signed in Lagos.¹⁶ Ideally, Nigeria should be credited with the hosting of this landmark event. However, the reference to 'Lagos' in this pivotal document that outlined an economic development blueprint for the African continent has over the years carried an emotive and symbolic significance that epitomises the clout of Lagos in the history of African emancipation from colonialism. The importance of Lagos in this regard is not unconnected with the fact that freed slaves from Brazil who re-settled in Lagos were instrumental to the birth and growth of pan-Africanism across Africa.¹⁷

4. The socio-economic and political context of Lagos's interaction with international law

4.1. Lagos and environmental governance/activism

Despite being subsumed under the federal framework of the Nigerian state as a recognised second tier of government, it was inevitable that Lagos's economic significance within sub-Saharan Africa would create pathways to the broader global community. As a commercial metropolis and a megacity, Lagos has unique

¹⁵ Notable agreements signed in Lagos include the treaty establishing the Economic Community of West African States in 1975 and the 1981 Lagos Plan of Action which set out an alternative economic development blueprint for Africa at a time of increasing resistance to the influence of Bretton Woods institutions in the African States.

¹⁶ See United Nations. Economic and Social Council; United Nations. Economic Commission for Africa (1991-03). Appraisal and review of the impact of the Lagos Plan of Action on the development and expansion of intra-African trade. UN. ECA Conference of African Ministers of Trade Meeting (11th session :1990, Apr. 15 - 19: Addis Ababa, Ethiopia).

¹⁷ See A B Laotan, 'Brazilian Influence on Lagos' (1961) *Nigeria Magazine* 69, 57-165; Damole, *supra* note 1

challenges related to its urban nature that have influenced the direction and intensity of its engagement in multilateral, regional and bilateral forums. For example, Lagos is a member of the C40 network¹⁸ as well as the Global Covenant of Mayors for Climate and Energy.¹⁹ Lagos's involvement with these international networks is instructive of the growing agency of cities across the world in international environmental governance. Lagos is, directly and indirectly, engaging with other cities within these networks in a bid to contribute to global climate change action, while simultaneously advancing its socio-economic development priorities through these internationalisation strategies. For example, in May 2018, Lagos hosted the launch of the C40 Climate Action Planning Africa Programme, where leaders of 9 African Megacities committed to delivering their share of the 2015 Paris Agreement.²⁰ Lagos' engagement with these international networks reflects a consistent track record of climate change policies implemented by the Lagos State government since the return to democratic governance in 1999.²¹ More importantly, it demonstrates the strategic position of Lagos in the unfolding decentralised approach to international environmental governance.

On a bilateral level, Lagos has pursued a series of strategic partnerships with external stakeholders, including the city of Dubai, to develop the first smart city in Africa.²² The smart city agenda seems ambitious in light of the crippling infrastructure deficit in Nigeria. However, Lagos has over the years being ahead of the curve concerning innovation among the sub-national entities in Nigeria. As such, the city has over the years demonstrated that it has the resilience to thrive despite the general socio-economic outlook of the Nigerian state. To achieve this aim, engaging in international collaborations has become a common strategy of successive governments in power. Lagos has been careful to avoid conflicts with the federal government in the area of its external interactions. Lagos has achieved this by using soft law mechanisms such as MoUs signed with counterpart cities. The aspiration to make Lagos a smart city does not create an immediate connection to international law. However, the implications of developing a smart city entail developing the necessary digital infrastructure and putting in place cybersecurity measures on

¹⁸ See <https://www.c40.org/cities/lagos> accessed 18 May 2020.

¹⁹ See <https://www.globalcovenantofmayors.org/cities/lagos/> accessed 18 May 2020.

²⁰ See https://www.c40.org/press_releases/mayors-of-9-african-megacities-commit-to-delivering-their-share-of-the-paris-agreement . accessed 18 May 2020.

²¹ It is instructive to note that the majority of the climate change mitigation strategies introduced in Lagos are attributable to the leadership of Mr. Babatunde Fashola.

²² See Michael Nwakalor, 'Lagos State signs historic Smart City deal with Dubai' available at <http://venturesafrica.com/lagos-signs-historic-smart-city-deal-with-dubai/> accessed 18 May 2020.

a scale not currently undertaken in any other part of the country. Issues of this nature fall within the purview of ongoing debates to develop effective and binding international law on cyberspace.²³ Looking forward, Lagos's progression towards becoming a smart city will undoubtedly situate Lagos within the evolving discussion on creating international legal norms pertaining to cyber activities.²⁴

4.2. Lagos and geo-political/paradiplomatic relations

Another important interaction between Lagos and international law that falls under the political dimension is seen in the incident that occurred in the early 90s. A street corner in New York City was renamed after Kudirat Abiola, an assassinated activist in Nigeria. The ruling military junta in a symbolic retaliatory measure of defiance responded to the commemorative renaming of the New York street by renaming a Lagos street in which had the US Embassy after the African American anti-establishment activist Louis Farrakhan. When Nigeria returned to civilian rule in 1999, the street was renamed after the US ambassador, the African American Walter Carrington. Wale Adebaniwi discusses these events from the perspective of 'Toponymy,' i.e. the study of place names, arguing that 'when street names are targeted at foreign governments/states, they potentially constitute retaliatory measures or 'retortion' in international law.'²⁵ In making this argument, Wale points out that

...the conduct of misconduct within (international relations, street (re) naming can provide opportunities for symbolic retortion - the retaliatory gesture which, in international law, is described as a non-amicable action, short of war, which one state takes against the other in response to conduct that the retaliating state considers injurious or unfriendly.²⁶

Wale makes a persuasive argument here for elevating the symbolic retortion by both parties over the killing of Kudirat Abiola with retaliatory gestures in international law. The events that ensued after the New York City Council proposed to name the street housing the Nigerian Embassy after the late Kudirat Abiola created palpable tension between Nigeria and the New York City Council. At some point, the Nigerian government took the New York City Council to court arguing that the proposed naming was an

²³ See Abid A Adonis, 'International Law on Cyber Security in the Age of Digital Sovereignty', Mar 14 2020, <https://www.e-ir.info/2020/03/14/international-law-on-cyber-security-in-the-age-of-digital-sovereignty/> accessed 18 May 2020.

²⁴ <https://ccdcoe.org/uploads/2018/10/Tallinn-Paper-No-5-Schmitt-and-Vihul.pdf> accessed 18 May 2020.

²⁵ Wale Adebaniwi, 'Global Naming and Shaming: Toponymic (Inter) National Relations on Lagos and New York's Streets' (2012) *African Affairs*, 111 (445) 644. See also Mia Swart, 'Name changes as symbolic reparation after transition: the examples of Germany and South Africa' (2008) *German Law Journal* 9(2) 105-120.

²⁶ Wale, *supra* note 25, at 646-647.

unconstitutional attempt by New York City to conduct foreign policy.²⁷ However, with the benefit of hindsight, the events that played out in the city of Lagos and New York lacked the gravity or severity to escalate to war potentially.

However, Lagos, which at this point was no longer the capital of Nigeria was at caught up in this diplomatic row due to its symbolic position in international law and relations. Home to most foreign embassies and consulates in Nigeria, it was inevitable that Lagos would be pivotal in the military junta's retaliation against the actions of the New York City Council. Wale recounts that

Two weeks after the Kudirat Abiola Corner's sign was raised in New York, the Abacha regime secretly ordered the military-appointed Eti-Osa Local Government Council in Lagos State - a state which was the hotbed of opposition politics - to rename Eleke Crescent in Victoria Island, Lagos, after the Leader of the Nation of Islam and virulent critic of the US government, Farrakhan. The foreign embassies located on Eleke Crescent included those of the United States, Britain, Canada, The Netherlands, and India. It was the regime's own way of shaming the US government in return.²⁸

The choice of name for the renamed street - Louis Farrakhan – was as symbolic as the street which was selected for renaming in Lagos. Louis Farrakhan was a political activist, leader of Nation of Islam, a black nationalist group, and a reputed anti-establishment campaigner. The Abacha military junta renamed Eleke Crescent after Louis Farrakhan had publicly expressed his support for the military junta in a state-sponsored visit to Nigeria in 1996.²⁹ The US embassy in defiance of this retaliatory move by the Abacha regime refused to acknowledge the new street name.³⁰ This act of contestation by the US which Azaryahu argues is tantamount to civil disobedience³¹ underscores the pivotal role that street naming and renaming in Lagos played in Nigeria's interaction with the Global West during the Abacha era of military rule.

With the sudden death of General Sani Abacha in June 1998, Nigeria transited back to civilian democratic rule in May 1999. Under the new civilian administration in Lagos state headed by Bola Ahmed Tinubu, the Louis Farrakhan Crescent was renamed Walter Carrington Crescent after former the former US Ambassador to Nigeria. This was a unilateral act of the newly elected Lagos State Governor who had been

²⁷ For detailed accounts of the events that transpired in reaction to the killing of Kudirat Abiola, see Wale Wale, *supra note 25*, 647-652.

²⁸ *ibid*, 654.

²⁹ *ibid*

³⁰ *ibid*

³¹ Maoz Azaryahu, 'The power of commemorative street names' (1996) *Environment and Planning D: Society and Space* 14 (3) 322, at 318.

privity to the events that led to change of name from Eleke Crescent to Louis Farrakhan Crescent.³² The renaming of this iconic street of international reputation and fame was regarded both home and abroad as a symbolic triumph over tyranny represented by the years of military interregnum experienced in Nigeria.

This action by the Lagos state government demonstrates once gain the symbolic importance of Lagos in Nigeria's interaction with international law and relations. The reaction of the Lagos state government under Governor Tinubu was paradiplomatic, mirroring the prior actions of New York City which was *prima facie* acting as a paradiplomatic actor, rather than as a proxy for the US federal government. The retaliatory actions by the Abacha military junta against this act of symbolic retortion by New York City and the counter-balancing actions by the Tinubu-led civilian government underscores the potency of cities and regions to tilt the scale of international relations and international law. Acting within the confines of municipal law which subsumes their voice within the sovereign nation-state, Lagos and New York City through this episode demonstrated the growing agency/activism of cities and regions in the international realm which these city reports aim to mainstream into the academic discourse of international law.

4.3. Lagos and international investment regulation/law

Furthermore, from an international trade/investment law perspective, Lagos has indirectly played a crucial role in the development of Nigeria's policies for engaging with international investment law regimes. Especially in the context of Nigeria's reform of the regulatory and institutional mechanisms for foreign direct investment and investor protection, Lagos has featured prominently in the equation. Evidence of this is found in the fact that international organisations such as the OECD in their engagement with Nigeria on its reform process have had to factor in Lagos into the review. In 2015, the OECD conducted a state-level review side-by-side with the national review of Nigeria's invest reform process.³³ Justifying the selection of Lagos for review, it was pointed out in this report that the Lagos through its pioneering policies such as the establishment of a commercial arbitration centre and enacting a raft of investment focused policies, e.g. a state Arbitration Law, a Public-Private Partnership Law and State Public Procurement Law has a pivotal role to play in Nigeria's reformed investment regime.

The attention given to Lagos in this regard is not surprising, considering that Lagos is regarded as the economic powerhouse of the country. Since 1999, Lagos has attracted a significant amount of foreign

³² Wale, *supra note 25*, 657.

³³ See OECD, *OECD Investment Policy Reviews: Nigeria* (OECD Publishing, 2015)

direct investment (FDI) to meet its unique economic developmental challenges as an urban centre. More so, Lagos as a city has attracted the attention of national governments, who now see the city as a strategic actor in their foreign relations agenda for Africa. For example, in 2011, the British Prime Minister - David Cameron in his first official visit to Nigeria led a business delegation to Lagos state and shunned Abuja, the capital city.³⁴

4.4. Lagos and global urban health governance

Finally, the report will briefly touch on Lagos' contribution to global urban health governance drawing on the city's public health response to the outbreak of the COVID-19 pandemic.

Cities and regions around the world have been at the heart of the global response to the COVID-19 pandemic. In responding to this global crisis, Cities are subject to the regulatory dictates of the central government, which conventionally represents the sovereign state in the international plane. Despite the constraints, cities face, these actors have demonstrated resourcefulness, sometimes testing the boundaries of what is constitutionally acceptable nationally and internationally. More so, the experiences of, and

responses of cities and regions across the world have been varied, given the disparity in socio-economic circumstances across the globe.

For Lagos, its experience with the Ebola virus disease (EVD) in 2014 has been a valuable learning curve which has undoubtedly come in handy during the COVID-19 pandemic. In a recent public webinar, the Governor of Lagos State - Governor Sanwolu remarked they EVD crisis made Lagos more equipped for the current [COVID-19] crisis.³⁵ Just like with the EVD epidemic, Lagos has been at the centre of the outbreak of the COVID-19 virus in Nigeria. This is not surprising considering that Lagos is the commercial nerve

³⁴ See 'British PM, Cameron Visits Nigeria, Shuns Abuja!' The Street Journal (Ibadan, 19 July 2011) available at: <http://thestreetjournal.org/2011/07/british-pm-cameron-visits-nigeria-shuns-abuja/> accessed 01 June 2020. See also: 'Fashola, UK Envoy Discusses Better Business Ties' PM News (Lagos, 20 February 2012) available at: <http://www.pmnewsnigeria.com/2012/02/20/fashola-british-envoy-discuss-improvement-in-business-relations-fashola-british-envoy-discuss-improvement-in-business-relations/> accessed 01 June 2020.; 'Lagos, Netherlands Seek Partnership to Tackle Infrastructure, Environmental Challenges' Naira Land Forum, 8 March 2012 available at: <http://www.tundefashola.com/archives/news/2012/03/06/20120306N01.html> accessed 4 April 2014; 'Fashola Makes Case for Nigeria-Russia Cooperation in Railway Development' available at: <http://www.lagosstate.gov.ng/news2.php?k=2902> accessed 01 June 2020.

³⁵ See "A Global Pandemic: Local Realities and Peculiarities- A View from the Frontlines" available at: <https://www.youtube.com/watch?v=GutXqcP7jiQ> accessed 01 June 2020.

centre of Nigeria. With this enviable position comes responsibilities and challenges which have put Lagos at the heart of Nigeria's response to the pandemic. Governor Sanwolu talked about the constraints and challenges that Lagos have faced in a bid to stop the spread of the COVID-19 virus. He pointed out that Lagos has more complexities than most sovereign states in sub-Saharan Africa.³⁶ Governor Sanwolu also remarked that Lagos has provided 'natural leadership' in Nigeria's response to the pandemic despite the constraints it faces with being subsumed under the federal government.³⁷ He gave an example of how Lagos would have closed the borders sooner if it was within the powers of the state to do so.³⁸

5. Conclusion

This report captures the multi-dimensional nature of Lagos' interactions with international law. From its origins as a port city strategically situated along the Bight of Benin to its current expression in modern-day Nigeria, Lagos has remained in the international spotlight. It is evident from the analysis that during its eventful and colourful history, Lagos' interactions with international law has evolved and found diverse expression. Despite the diversity of expressions and interactions discussed in this analysis, a reoccurring theme in the discourse is Lagos's centrality to events around it. Lagos' prominence during the trans-Atlantic slave trade situated the city in the epicentre of human trafficking both at its peak and decline. Again, in its engagement with other cities, the international organisations and global governance mechanisms, Lagos has always been at the heart of politics, diplomacy and innovation.

³⁶ *ibid*

³⁷ *ibid*

³⁸ *ibid*