"STANDARDS OF PROOF, ENFORCEMENT OF JUDGMENTS AND AWARDS UNDER THE EMPLOYEE'S COMPENSATION ACT 2010: EVIDENTIARY CHALLENGES, COMPLIANCE AND JUDICIAL STRATEGIES"; BEING A PAPER PRESENTED BY HON. JUSTICE O. Y. ANUWE AT THE 2026 EDITION OF THE LEGAL STAKEHOLDERS' ENGAGEMENT

INTRODUCTION

I wish to thank the Nigeria Social Insurance Trust Fund for once again presenting this platform which has now become an annual event. The leadership of the NSITF under it's Managing Director Barr. Oluwaseun Mayomi Faleye has shown the commitment of the Fund, to do things right.

This 2nd edition of the Legal Stakehoders engagement has clearly shown the commitment of the NSITF to add value to it's operations.

Last year, we had a robust interaction, and it is no wonder that the horizons are broadening in this engagement.

I wish to thank the President of the National Industrial Court of Nigeria for counting me worthy to present this paper which is titled "Standards of Proof, Enforcement of Judgments and Awards under the Employee's Compensation Act 2010: Evidentiary Challenges, Compliance And Judicial Strategies".

This theme invites us to consider a practical question which is: "How do we ensure that a right recognized by law becomes an actual relief received in reality?"

The Employees' Compensation Act 2010, (the Act), provides a framework for addressing the consequences of work-related injury, disease, disability and death. Yet legislation alone cannot fulfil that promise. A claimant must be able to establish a legitimate claim; the responsible institution must determine it fairly; and the resulting entitlement must be honoured.

A right that cannot be effectively established is vulnerable. A right that has been established but cannot be enforced is incomplete. And a judgment or award that remains unsatisfied risks diminishing public confidence in the administration of justice.

Our discussion today must therefore move beyond the abstract recognition of employees' rights to examine the practical processes through which those rights are proved, determined, enforced and ultimately realised. Bearing in mind that an effective compensation system requires reliable evidence, fair procedures, accountable institutions and enforceable outcomes.

I will address four central questions:

1. **What burden and standard of proof should govern claims under the Employees' Compensation Act?**

2. **How should courts and relevant institutions assess medical evidence, employment records and other documentary materials?**

3. **What legal, institutional and practical obstacles impede compliance with compensation decisions, judgments and awards?**

4. **What judicial, legislative and administrative strategies can improve enforcement and promote efficiency in post-judgment processes?**

Before considering the above four points, it is expedient to consider the statutory framework and the question of jurisdiction. The preliminary issue of jurisdiction remains paramount, nevertheless, the enacted **Employees' Compensation Act (the Act) is aimed at providing an open, fair and adequate compensation system for employees and their dependants in circumstances covered by the legislation.**

The Act assigns its implementation to the Nigeria Social Insurance Trust Fund Management Board and establishes the Employees' Compensation Fund from which statutory compensation is paid.

These arrangements matter because they identify both the institution responsible for administering the scheme and the procedure through which a claimant must seek relief.

The constitutional position is equally important. Section 254C(1)(c) of the Constitution confers exclusive jurisdiction on the National Industrial Court of Nigeria over civil causes and matters relating to, connected with or arising from the Employees' Compensation Act.

However, the existence of jurisdiction over a subject does not dispense with the need to follow the procedure prescribed for a particular claim. In the case of **MRS. JUDITH O. JOHN V. BAKER HUGHES INC. & ANOR Unreported Suit No.:** NICN/PHC/78/2017, **my learned brother, Hon. Justice Z. M. Bashir considered the relationship between the Court's jurisdiction and the statutory machinery for obtaining compensation.**

Two questions are imperative:

- What is the legal basis of the claim?
- What procedure does the law prescribe for pursuing it?

Failure to answer either question correctly may delay a deserving claim before its merits are ever considered.

1. BURDEN AND STANDARDS OF PROOF IN EMPLOYEES' COMPENSATION CLAIMS

The first issue is the burden of proof: who must establish the facts necessary to obtain compensation, and what degree of proof is required? The basic principle is: "He who asserts must prove."

Sections 131–134 of the Evidence Act 2011 provides the general framework governing the burden of proof in civil proceedings. The applicable standard is ordinarily the balance of probabilities.

Put simply, the evidence must persuade the decision-maker that the claimant's account is more likely than not to be true but the burden of proof cannot be discussed in isolation from the cause of action. Before deciding whether a claimant has proved enough, we must first identify what the law requires that claimant to prove.

In **NIGERIA BREWERIES PLC V. AUDU (2009) LPELR-8863 (CA),** the Court of Appeal held thus:

"The law is quite trite that he who asserts must prove. In civil cases, the burden of proof is on the party who asserts a fact to prove same. The burden of proof in negligence falls upon the plaintiff. Failure to prove the particulars of negligence pleaded is fatal to the plaintiff's case." Per Hon. Justice Oyebisi Folayemi Omoleye, J.C.A. (as she then was).

Similarly, in **THE SHELL PETROLEUM DEV. COM. (NIG.) LTD. V. EFFIONG IKONTIA & ORS. (2010) LPELR-4910 (CA)**, it was held that the claimant must adduce credible evidence to establish that the defendant owed him a duty of care, that the duty was breached, and that he suffered damage as a result of the breach. **Per Ja'afaru Mika'ilu, J.C.A. (Justice of the Court of Appeal).**

From the above, a fundamental principle is established: a compensation claim must be supported by credible evidence sufficient to establish the facts required by the applicable legislation.

The National Industrial Court of Nigeria has repeatedly affirmed that a claimant's case must

stand on credible evidence, not on the weakness of the defence. My learned brother, Hon. Justice Rabi H. Gwandu, in EMMANUEL NDIFON V. BEL IMPEX LTD, Unreported Suit No:. NICN/LA/262/2020, delivered in the Lagos Judicial Division on 28th October 2021, held that the burden lies on the injured worker to prove that the injury was caused by an accident arising out of and in the course of employment, and that an allegation of employer negligence must itself be proved.

Similarly, my learned brother, Hon. Justice Ikechi Gerald Nweneka, in **MANDELA IMUFA V. NIGERIA OUWADE COMPANY**, NICN/LA/137/2023, delivered in the Lagos Judicial Division on 21st January 2025 **emphasized that the fact of injury alone, without proof of breach of duty, does not automatically entitle a claimant to compensation where the claim is framed as damages claim. This distinction is crucial: statutory compensation under the ECA is not identical to a common-law claim in negligence.**

To further expatiate on this, the Employees' Compensation Act 2010, also cited as the ECA, is fundamentally a no-fault compensation scheme. Its objective is to guarantee compensation for work-related death, injury, disease, or disability, and section 12(1) provides that the Act's provisions are generally in lieu of other rights of action founded on breach of duty.

One recurring difficulty in workplace-injury litigation is the tendency to treat statutory compensation and common-law damages as interchangeable. They are not. Under the statutory scheme, attention centres on the conditions for compensation under the Act: the employment relationship, the qualifying injury or other harm, its connection to employment, and compliance with the applicable claims procedure.

A negligence action raises a different inquiry. The claimant must establish a duty of care, breach of that duty and damage caused by the breach. See, **OLANIPEKUN AWOLOKUN v. FREEME DIGITAL LTD.** SUIT NO. NICN/LA/55/2022, per Hon. Justice Ikechi Gerald Nweneka, Para. 20; Also see, **MR. FRANK ENEH v. ALKEM NIGERIA LTD SUIT NO:**

NICN/LA/88/2020, per Hon. Justice (Prof) Elizabeth A. Oji, Para.20.

Where a claimant succeeds in an injury claim, the National Industrial Court of Nigeria (NICN) may award damages pursuant to Section 19(d) of the National Industrial Court Act, 2006. This provision empowers the NICN to make "an award of compensation or damages in any circumstance contemplated by this Act or any Act of the National Assembly dealing with any matter that the Court has jurisdiction to hear".

The provision of S.19(d) of the National Industrial Court Act, 2006, was applied in the case of JOHN O. ONWUKANJO V. ZENITH SECURITIES LTD. & 2ORS, NICN/OW/16/2015, where I held the 1st Defendant liable for its failure to provide immediate and specialized medical treatment for the Claimant at the time of the incidence, which amounted to a breach of its duty to the Claimant. However, in the case of MR. CHRISTIAN EGWUTU V. JULIUS BERGER CONSTRUCTION COMPANY PLC. Suit No: NICN/ABJ/129/2020, the claimant did not succeed, as he failed to satisfactorily prove that he sustained the injury while working for the Defendant

or that the Defendant was at fault for the occurrence of the accident or injury sustained by the Claimant.

Authorities such as **NIGERIA BREWERIES PLC V. AUDU (2009) LPELR-8863 (CA)** and **THE SHELL PETROLEUM DEV. COM. (NIG.) LTD. V. EFFIONG IKONTIA & ORS. (2010) LPELR-4910(CA),** as mentioned above, illustrate the evidentiary demands of negligence claims. They should not, however, be used to import a fault requirement into a statutory claim where the legislation does not require one.

The distinction between ECA compensation through the NSITF Board and Common-law damages for negligence also appears in the workplace-injury decisions considered in this paper, including **EMMANUEL NDIFON V. BEL IMPEX LTD NICN/LA/262/2020,** per Hon. Justice Rabi H. Gwandu and **MANDELA IMUFA V. NIGERIA OUWADE COMPANY NICN/LA/137/2023,** per Hon. Justice Ikechi Gerald Nweneka.

In **FOLARIN SHAMSUDEEN V. BRITISH AMERICAN TOBACCO (NIG.) LTD.** Suit No.: NICN/IB/75/2016, my learned brother, Hon. Justice

J.D. Peters held that, "negligence is a question of fact not law. Therefore, each case must be decided in the light of its own facts and circumstances. The facts of a case bordering on negligence must be proved by the person who asserts same. This is in tandem with the age-long established principle of law that he who asserts must prove the assertion. Therefore, failure to prove particulars of negligence pleaded is fatal to the plaintiffs case"

An injury may be real and serious, yet a negligence claim may fail if breach of duty and causation are not established. Equally, a statutory claim should not be rejected merely because the claimant has not proved negligence where negligence is not an element of that entitlement. See OYE SODIQ ADEMOLA v. IRON PRODUCTS INDUSTRIES LIMITED, SUIT NO: NICN/LA/409/2020 para. 9, per. Hon. Justice Elizabeth A. Orji.

Flowing from the above distinction, in choosing the appropriate legal route, in **ANTHONY UTIBE V. JIUXING INTEGRITY INDUSTRIES LIMITED,** Suit No. NICN/OW/43/2023, Owerri Judicial Division, my learned brother, **Hon. Justice N. C. S. Ogbuanya** highlighted the importance of section 12 of the ECA

and the consequences that may follow a claimant's choice of remedy. He held @ para.16, thus:

"…the enactment of Employees' Compensation Act (ECA) 2010, has presented two optional but mutually exclusive routes to receiving remedy of compensation for injury sustained at work or workplace – (1) the statutory route through ECA; and (2) through the common law principle of negligence. **Key distinguishing features of the two legal pathways exist, to the effect that a resort to claim under ECA forecloses common law application, and that, while this Court has appellate jurisdiction if ECA route is explored, original jurisdiction is available under common law claim for negligence."**

It was further explained **@para.17**, that:

"**If the statutory route is taken, this Court can only be approached on appeal over review of the disputed compensation computed and paid by the NSITF Board, as recovery of compensation under the statutory route is payable by the NSITF Board. If, however, the common law route is elected, this Court has original jurisdiction, and compensation can**

be payable by way of general damages for proven acts of negligence on the part of the Defendant employer. See: Ss.12 (1) (3) and 55(4) ECA; S.254C (1) (b) Constitution of the Federal Republic of Nigeria 1999 (as amended)."

The cases of **ABONYI AGBO GEOFFREY V. DANGOTE AGROSACKS LTD** (Suit No. NICN/LA/315/2013, Judgment delivered on December 7 2017, per B.B Kanyip PhD, PJ Lagos Div. as he then was, now HPNICN); **JOSHUA WYCLIFF V. YF CONSTRUCTION DEVELOPMENT AND REAL ESTATE LIMITED** (Suit No. NICN/ LA/441/2014, Judgment delivered on February 8 2018, per J.D Peters J); **JOHNSON OBOZUWA ACHA V. STANDARD METALLURGICAL CO LTD** (Suit No. NICN/LA/ 536/2017, Judgment delivered on October 12 2018, per Ogbuanya J) **are frequently cited together as a foundational trilogy establishing how the NICN treats claims arising from industrial accidents. The core similarities between these three landmark judgments of the National Industrial Court of Nigeria (NICN) center on the legal regime for workplace injury compensation and the application of the "principle of election" under Section 12(1) of the Employees' Compensation Act (ECA) 2010.**

In my view, it is incorrect to contend that the ECA provides the exclusive remedy for workplace injuries. Section 12(1) preserves the principle of election, allowing an affected employee to pursue statutory compensation or an action in negligence at common law. It is my view, that the ECA does not, in itself, preclude an employee's right to sue in negligence for workplace injuries.

More so, with the provision of s. 7(1) of the ECA, there is absolutely no distinguishing between whether a claimant got injured in the course of doing his lawful duties or not as contemplated in actions in Tort.

Section 7 (4) makes it clear that any accident which arose out of the employment, shall be presumed to be an injury which occurred in the course of the employment. See CHUKWUMA JOSEPH V. NIFEX STEEL ROLLING MILLS LTD. & ANOR **Suit No: NICN/OW/09/2018 para. 108, per, Hon. Justice I.S. Galadima.**

Counsel should therefore consider the available route before proceedings begin, rather than leave that question to emerge during trial.

The pleading must identify the claim actually being pursued. The evidence must support its legal elements. The relief sought must correspond with the Court's powers and the applicable statutory framework.

Calling a claim "compensation" does not resolve these questions. Precision at the beginning can prevent substantial injustice at the end.

2. ADMISSIBILITY AND EVALUATION OF MEDICAL AND DOCUMENTARY EVIDENCE

Medical evidence often provides the link between an incident at work and the compensation sought.

It may explain the nature of an injury, the treatment received, the extent of disability, the prospects of recovery and the effect on the employee's ability to work.

In occupational-disease claims, it may also help establish a connection between workplace exposure and a condition that developed over time.

The value of such evidence depends on more than the existence of a medical report. It's reasoning, factual foundation and relevance to the disputed issues all matter.

Admissibility and Weight

We must now distinguish between admitting a document and accepting the conclusions it contains.

Admissibility concerns whether the law permits the evidence to be received. Weight concerns how persuasive that evidence is when considered alongside the rest of the case.

The decision in OBASUYI & SONS (SAWMILLS) LTD V. ERUMIAWHO (1999) LPELR-SC.161/1994 which was before the expansion of the NICN's modern jurisdiction, remains instructive and a landmark Nigerian appellate case, which illustrates the difference between admissibility and weight. A medical report or assessment may be admitted, but where its maker is not called, lacks independence, or the document is unauthenticated, the court may attach little or no probative value to it.

A medical report should be examined for what it actually establishes. Does it identify the condition? Does it explain the basis of the diagnosis? Does it address the alleged connection with employment? Does it distinguish temporary incapacity from permanent impairment?

Where the author's opinion is contested, the applicable evidentiary rules and the opportunity to test that opinion become especially important.

Neither automatic acceptance nor automatic rejection serves justice. The task is careful evaluation. More so, **my learned brother, Hon. Justice R. H. Gwandu, in NDIFON V. BEL IMPEX LTD, Unreported, Suit No. NICN/LA/262/2020, Lagos Judicial Division of this court, on 28th October 2021, restated that evidence is admissible where it is relevant and competent, and that documentary evidence must be properly pleaded and connected to a fact in issue.**

As regards, <u>procedural, compliance and statutory safeguards,</u> the ECA contains requirements concerning notification, employer reporting and applications for compensation.

These provisions should be addressed early. Claimants need clear guidance on what to submit, to whom, and within what period. Employers must understand their own reporting responsibilities.

At the same time, the statutory safeguards must receive proper attention. **Section 4(4) provides that failure to give the required information is a bar to compensation, unless the Board is satisfied that the information was sufficient, the employer had knowledge, or the employer was not prejudiced and justice requires the claim to be allowed.**

My learned brother, Hon. Justice M. N. Esowe, in the Lagos Judicial Division of this court in **OLABIYI OLATUNDE V. CAPPA & D'ALBERTO PLC NICN/LA/79/2019 applied this saving provision to allow a statutory claim despite procedural defects, holding that the employer had not shown prejudice and that justice required the claim to be allowed. By contrast, in IMUFA V. NIGERIA OUWADE COMPANY NICN/LA/137/2023, my learned brother, Hon. Justice Ikechi Gerald Nweneka, cited Section 6[2] of the Employees' Compensation Act, 2010. The Court held that the ECA claim was barred because there was no evidence that the**

employer was registered with the NSITF or that an application was filed within a year.

The lesson is clear: procedural compliance is not a technicality; it is often the gateway to substantive relief.

In essence, a medical report that merely identifies a disease may be insufficient to establish its occupational origin. Conversely, a well-supported specialist opinion, considered alongside employment records and credible testimony, may provide substantial evidence of the necessary connection.

3. ENFORCEMENT GAPS, DELAYS AND COMPLIANCE CHALLENGES

This third issue is perhaps the most consequential: **what happens after a claim has been established and compensation has been awarded, or after a court has delivered judgment?**

A justice system cannot be judged solely by the quality of its decisions. It must also be judged by whether those decisions are implemented. This is because, an award that is not enforced is, for the injured worker, a

paper victory. Enforcement must therefore be treated as part of the administration of justice, not as an inconvenient sequel to it.

It is proper to identify the obligation before selecting the remedy. Not every compensation-related obligation has the same legal character.

An administrative determination under the ECA is not necessarily identical, for enforcement purposes, to a judgment of the National Industrial Court of Nigeria or an award made through another lawful process.

Before taking enforcement steps, practitioners should identify:

- The source and nature of the obligation.
- The person or institution legally responsible for payment.
- The applicable review or appeal procedure.
- The lawful mechanism for securing compliance.

This distinction helps prevent proceedings against the wrong party or reliance on an enforcement process that does not fit the decision.

CHALLENGES/RECURRING OBSTACLES

This paper identifies several practical barriers: delayed payment, disputes over responsibility, inadequate records, insolvency and difficulty tracing assets. However, the most common challenges causing enforcement and compliance gaps are non-registration by employers with the NSITF and failure to remit periodic contributions to the Fund in compliance with Part VI of the Employee Compensation Act which is required to make a claimant eligible for compensation by the Board.

In **THANKGOD SUNDAY UDOFIA v. HONGXING STEEL COMPANY LTD. SUIT NO: NICN/LA/382/2015, my learned brother, my learned brother, Hon. Justice O.A. Obaseki-Osaghae, held that the lack of evidence that the defendant is registered with the NSITF, makes its periodic contributions to the fund, and its failure to promptly report the injury makes the defendant solely liable to compensate the claimant for his injuries as it had adequate notice under Section 4 (4)(b) of the Employee Compensation Act.**

The above problems arise at different points in the compensation process and should not be treated as though they have a single solution.

Non-remittance requires effective regulatory action. Disputed entitlement requires fair determination. Failure to obey a judgment requires the appropriate enforcement response.

Institutional coordination matters because a claimant should not be left to navigate avoidable confusion between these separate responsibilities.

Judicial authority is sacrosanct , as respect for the rule of law and strategies for continued efficiency by private or public authorities remains paramount.

In **GOVERNOR OF LAGOS STATE V OJUKWU (1986) 1 NWLR (PT. 18)** 621, the Supreme Court strongly affirmed the importance of obedience to the rule of law and rejected the proposition that a government or public authority may disregard the law simply because it possesses institutional power.

Also, the case of **DR. (MRS) ANTHONIA CHIEBONAM EKWO V. INDEPENDENT NATIONAL ELECTORAL COMMISSION & ANOR Suit No.: NICN/EN/04/2024,** in the Enugu Judicial Division; wherein my learned brother, Hon. Justice O.O.

Arowosegbe delivered a key ruling on 15th May 2025 which reinforced judicial authority by protecting statutory employment rights against arbitrary time-bar defenses often used by public institutions to evade financial obligations.

Where a compensation dispute has been determined by a competent court, neither the public status of a party nor its financial or administrative power should become a justification for disobedience to the law.

The rule of law requires both individuals and institutions to respect the legal consequences of valid decisions.

Given the exclusive jurisdiction of the National Industrial Court of Nigeria over causes and matters arising from or connected with the ECA, under section 254C(1)(c) of the Constitution. The Court also has power to apply international best practices and ratified treaties in labour matters.

Judicial strategies should therefore include:

- Early identification of the true cause of action: statutory compensation, negligence, or both where legally permissible;
- Active case management to compel early disclosure of employment, medical, payroll, and insurance records;
- use of court-appointed or agreed independent medical experts where disability is contested;
- firm handling of dilatory tactics, especially where employers withhold records within their exclusive control;
- prompt delivery of reserved judgments;
- clear enforcement orders with dates, interest, and consequences for non-compliance;
- referral of systemic non-compliance, such as non-registration or non-remittance, to the NSITF and relevant regulatory authorities.

In **SALAMI V. JULIUS BERGER UNREPORTED, SUIT NO.: NICN/JOS/14/2023**, **my learned brother Hon. Justice I.S Galadima in the Jos Judicial Division demonstrated a balanced approach: the court refused relief not proved, but ordered payment of established terminal entitlements within a fixed period, with interest accruing upon default.**

That is the kind of practical, enforcement-oriented judicial strategy workers need.

4. STRENGTHENING ENFORCEMENT MECHANISMS AND PROMOTING EFFICIENCY IN POST-JUDGMENT PROCESSES

To improve the effectiveness of the Employees' Compensation Act 2010, deliberate judicial, administrative and institutional reforms are necessary.

First, establish clear enforcement procedures. Develop accessible guidelines outlining the steps for payment, review, appeal and enforcement of compensation decisions and court judgments. Clearly distinguishing administrative compensation payments from judicial judgments and arbitral awards will reduce procedural confusion and unnecessary litigation.

Second, strengthen judicial case management. The National Industrial Court and other competent courts should identify disputed issues early, ensure timely production of medical and employment records, set reasonable procedural timelines and issue clear, enforceable orders. These measures will minimise

delays while preserving the parties' right to fair hearing.

Third, improve evidence management. Employers should maintain accurate workplace accident, employment and safety records, while healthcare providers should ensure proper documentation of medical evidence. The NSITF should promote consistent claims documentation and secure digital recordkeeping in compliance with applicable evidentiary and data-protection requirements.

Fourth, enhance compliance monitoring and accountability. Relevant institutions should track claims from submission to payment, establish escalation procedures for unjustified delays and monitor indicators such as processing times, outstanding payments and compliance with lawful decisions.

Fifth, leverage technology. Secure digital platforms can enable claimants to track applications, receive notifications and monitor payment progress. Electronic registers of judgments and outstanding obligations can also improve accountability, provided confidentiality, cybersecurity and due process are protected.

Sixth, promote alternative dispute resolution. Mediation and other lawful settlement mechanisms can resolve suitable disputes more efficiently, particularly those concerning documentation or payment calculations. However, such processes must not undermine employees' statutory entitlements or compel unfair settlements.

Seventh, strengthen stakeholder collaboration. The judiciary, legal practitioners, employers, NSITF, labour unions and policymakers should engage regularly to address enforcement challenges, improve professional education and promote compliance with statutory obligations.

Finally, protect vulnerable claimants while preserving fairness. Courts and institutions should minimise unnecessary adjournments and repetitive documentation demands, while ensuring that all parties retain their lawful rights to challenge disputed claims and appeal decisions.

Effective enforcement requires clear procedures, reliable evidence, efficient judicial processes, institutional accountability and cooperation among stakeholders. The ultimate objective is to ensure that

legitimate compensation claims are determined fairly and that lawful entitlements translate into timely, tangible relief for injured employees and the dependants of deceased workers.

A Call to Stakeholders

To employers: treat compliance as a legal responsibility, not an act of generosity. Meet registration, contribution and reporting obligations, preserve relevant records, and cooperate with lawful claims.

addresses the legal elements of the claim. Precision is a service to both the client and the Court.

To the NSITF: clear communication, timely assessment and predictable administration are essential to confidence in the scheme. Every file represents a person waiting for an answer.

To labour unions and civil society: help workers understand their rights and responsibilities before an injury occurs. Early awareness can prevent later evidentiary difficulties.

To the judiciary: continue to combine careful application of the law with an appreciation of the circumstances in which these claims arise. Protect fair hearing, discourage avoidable delay, and make orders capable of effective enforcement.

CONCLUSION

The success of the Employees' Compensation Act lies not merely in its provisions or judicial decisions, but in whether legitimate claims are fairly proved, lawfully determined, and effectively satisfied. While evidential standards must be consistently applied and enforcement kept within the law, neither should become an obstacle to justice.

Our collective responsibility is to strengthen evidence, improve claims administration, reduce delays, and ensure compliance with lawful decisions, so that injured workers and bereaved families receive not just the promise of compensation, but its actual benefit.

In conclusion, I wish to express my sincere appreciation to the organisers for bringing us together for this important engagement. I wish everyone fruitful deliberations and a renewed commitment to evidentiary fairness, statutory

compliance, institutional accountability, and the effective enforcement of compensation rights.

May our discussions translate into practical actions that strengthen labour justice and ensure that the rights of Nigerian workers are not merely recognised by law, but realised in practice.

Thank you, and I wish you all a successful and rewarding engagement.

Hon. Justice Olufunke Yemi Anuwe
National Industrial Court of Nigeria
Abuja Judicial Division