AN OVERVIEW OF THE DELTA STATE LIVESTOCK BREEDING, REARING AND MARKETING REGULATION LAW, 2021

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Abstract

In Nigeria, the increased frequency, ferocity and deadliness of conflicts between farmers and herders for land and grazing resources and their spread from the middle belt region to other regions and states of the country, including Delta State, has led states to enact Anti-Open Grazing Laws. The Delta State Government enacted the Delta State Livestock Breeding, Rearing and Marketing Regulation Law, 2021, as the Anti-Open Grazing Law of Delta State, 2021. Using the doctrinal research method, this paper conducts an overview of these laws, in relation to the issues and challenges of open grazing facing Delta State, Nigeria, and finds that the farmers-herders clashes are due mainly to the struggle for scarce land and grazing resources, leading to the North-South migration by herders and livestock for open grazing, which increases the propensity and capacity for conflict between these groups, the refusal of the herders to abide by the Anti-Open Grazing Law and the lack of support by the federal government and the security agencies for the enforcement of the law in Delta State. This paper also finds that herders have continued to engage in open grazing with great impunity across Delta State, in defiance of the Anti-Open Grazing Law, with rising incidences of farmers-herders clashes and other crimes such as kidnapping for ransom in Delta State. This paper recommends a strict implementation of the Delta State Anti-Open Grazing Law, 2021, while also advocating for the integration of modern and traditional conflict resolution strategies, to address the challenges of open grazing in Delta State, Nigeria.

Key-Words: Open grazing, Ranches, Designated Areas, Livestock, Herders, Delta State

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1. **Introduction**

The Delta State Livestock Breeding, Rearing and Marketing Regulation Law, 2021 is the Delta State version of the Anti-Open Grazing Law, 2021, duly passed by the Delta State House of Assembly and assented to by the Governor of Delta State on 30th September, 2021.[1] The objectives of the law are clearly outlined in the explanatory note of the law, as follows:

(a) Prevent the destruction of crops, community ponds, settlements and properties caused by open grazing of livestock;(b) Prevent clashes between nomadic livestock herders and crop farmers in the state;(c)Protect the environment from degradation and pollution caused by open rearing and/or grazing of livestock;(d) Optimize the use of land resources in the state for the benefit of its citizenry;(e) Prevent, control and manage the spread of diseases as well as the implementation of policies that enhance the production of high quality and healthy livestock for local and international markets; and (f) Create a conducive environment for large scale crops and animal production in the state.[2]

The Delta State Livestock Breeding Rearing and Marketing Regulation Law,2021, was enacted in response to the directive given to states in Nigeria to enact Anti-Open Grazing Laws following the meeting of the Governors of the southern states of Nigeria, on 11th of May, 2021, in Asaba, the capital of Delta State, Nigeria, to address serious issues plaguing the Nigerian nation.[3] The menacing consequences of open grazing practices in Nigeria, particularly, the senseless killings, wanton destruction of property, the displacement of people from their homes and the disruption of social life as a result of the frequent clashes between herders and farmers spreading from the middle belt region of Nigeria to other regions and states in Nigeria, including Delta State, were some of the main issues at the meeting.[4]The directive given to the States of

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[1] S. Egede, 'Southern Governors set Agenda for Buhari, oppose Open Grazing' *The Pointer* (Asaba, 12 May, 2021)1-3; F. Ahon, 'Okowa signs Anti-Open Grazing bill into law in Delta State, *Vanguard* (Lagos, 30 September, 2021) <https://www.vanguardngr.com> accessed 18 July, 2025.

[2] Delta State Livestock Breeding, Rearing and Marketing Regulation Law, 2021.

[3] I.L. Azomani and P. I. Gasiokwu, The Challenges of the Anti-Open Grazing Laws in Nigeria' *khazanah Hukum* (2025) 7(2), 225-227. <https://journal.unisgd.ac.id/index/kh> accessed 08 July, 2025.

[4] M.T. Gusa and A. M. Tijah, 'An Overview of the Benue State Open Grazing Prohibition and Ranches Establishment Law, 2017'. *Benue State University Law Journal* (2023) 11, 75-77; I. Ogunyemi, 'Herders-Farmers Clashes Over Land: Matters Arising', *Nigeria Tribune*<tribuneonline.com> accessed 31 May, 2025.

Nigeria to enact Anti-Open Grazing Laws included a deadline of 30th September, 2021, for states to comply by enacting the laws banning open grazing in their states.[5]

Almost four (4) years since the enactment, commencement and implementation of the Anti-Open Grazing Law in Delta State, the practice of open grazing is still ongoing with impunity in the state with consequences for Delta State and threatening to defeat the very essence and objective of the anti-open grazing law in Delta State.

This paper provides an overview of the Delta State Livestock Breeding Rearing and Marketing Regulation Law, 2021 (Delta State Anti-Open Grazing, 2021). It examines the conceptual terms used for clarity and offers a better understanding of these terms, give reasons why the law is necessary in Delta State, with a look at the legality and constitutionality of the law, an appraisal of the law, and a look at the possible challenges facing the law, before providing appropriate recommendations and a conclusion.

2. **Definition of Concepts**

In order to ensure a better understanding of this paper, it is necessary to define the concepts used for clarity, such as open grazing, ranches, designated areas, livestock, herders and Delta State.

According to section 2, Delta State Livestock Breeding Rearing and Marketing Regulation Law,2021, open grazing is defined as the act of roaming livestock within a designated area in search of pasture or foliage.[6] A designated area is defined by the law as including ranches, feedlots, homestead stables or any approved place for rearing, breeding, selling and buying livestock.[7] The law defines a 'Ranch' as an area of land approved for the grazing, breeding, rearing and marketing of livestock.[8] The law defines 'livestock' as including animals, such as cattle, pigs, goats, sheep, horses or any other animal designated as livestock by the Governor of Delta State, through a notice published in the state Gazette.[9]

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[5] R.S. Idowu, 'Southern Governors set deadline for the Promulgation of Anti-Open Grazing Laws' *ChannelsTelevision* (Abuja, 1 September, 2021) <https://channelstv.com /2021/07/05/southern-governors-set-deadline-for-promulgation-of-anti-open-grazinglaw>
accessed 6 October, 2023; Azomani and Gasiokwu (n.3).
[6] See n.2.
[7] *Ibid, s.2.*
[8] *Ibid.*
[9] *Ibid.*

The law further defines a 'herder' as any person who looks after a herd of livestock or makes a living from keeping livestock.[10] The law defines a 'Commissioner' as the Commissioner in charge of Agricultural and Natural Resources in Delta State and the Committee to mean the Livestock Management Committee.[11] The law describes 'State' as Delta State of Nigeria.[12] Delta State is one of the thirty-six (36) States making up the Federal Republic of Nigeria as contained in Part 1 of the First Schedule to the Constitution of the Federal Republic of Nigeria.[13]

3.The Need for The Delta State Livestock Breeding Rearing and Marketing Regulation Law, 2021

In Nigeria the practice of open grazing has evolved from being a simple tradition and lifestyle, in which once-benign herders of cattle and livestock animals were armed only with sticks to guide their animals, but have now transformed into sophisticated murderous criminals armed with automatic weapons such as AK-47 guns, which they use to kill, maim and carry out acts of violence against the citizens of Nigeria, including citizens of Delta State.[14] This situation has made open grazing in Nigeria today a very complex matter, with social, economic, environmental and security implications for the country.[15] This is because open grazing is not only a grazing method anymore in Nigeria, but has become a source of serious conflict between farmers and herders in Delta State and Nigeria.[16] The conflicts have spread from the middle belt region of Nigeria to other regions and states of Nigeria, including Delta State, with extremely deadly consequences.[17]

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[10] *Ibid.*
[11] *Ibid.*
[12] *Ibid.*
[13] s.3 CFRN 1999 (as amended).
[14] E. Ikhilae, 'Cattle Rights vs Human Rights,' *The Nation* (Abuja, 25 May 2021) <https://www. thenationonline.net > accessed 15 July, 2022; S. Oyeyepo and S. James, 'Ekiti Grazing Law: The Way to Go', *This Day* (Abuja, 5 September, 2016) <https://www.thisdaylive.com> accessed 15 July, 2022; I.L. Azomani, 'The Legal Impacts of the Asaba Declaration on Open Grazing Prohibition on the Protection of the Environment in Nigeria (PhD thesis, Faculty of Law Delta state University, 2025) 21, 72-77.
[15] N.J. Nnoruga, 'Open Grazing in Nigeria: A Threat to Human Life and Environmental Degradation,' Ochendo: *An African Journal of Innovative Studies* (2022) 3(1) 378-382; N. Dickson and Weinoh, 'The Fulani in Nigeria and their Herding System: Is it an Agro-Business or a Culture', *Journal of Policy and Development* (2024) 15(1) 111-124.
[16] *Ibid.*
[17] C. M. Ekpandu, 'Open Grazing Prohibition Legislations in Nigeria: A Panacea for Conflict and Insecurity', *International Journal of Law and Clinical Legal Education* (2020) (1) 1-3.

Amnesty international, a British non-governmental organization focused on human rights abuses, reported 3,641 deaths in the middle belt region of Nigeria between 2015-2018 from clashes between farmers and herders, as a result of open grazing.[18] In a similar vein, the News Agency of Nigeria (NAN) reported in January, 2018 that about 18,000 people had been displaced and were now living in camps of the Internally Displaced Persons (IDP) in Nassarawa State as a result of the clashes between farmers and herders, which were spilling over from Benue state and other states in the middle belt region of Nigeria.[19] The fear of gun wielding herders is now preventing numerous farmers across the regions and states of Nigeria including Delta State from accessing their farms, due to fear of being killed or attacked by marauding herders. There is also the destruction of farm crops and produce by the grazing livestock, which is threatening the food security and economy of Delta state and other states in Nigeria.[20] Some of the herders have misunderstood their supposed freedom of movement and right to conduct their livestock business as grazing their livestock anywhere and everywhere, thereby putting them into conflict with farmers and the indigenous people.[21]

The story in Delta State is not different from elsewhere. In Uwherun community in Ughelli North Local Government Area of Delta State, over 80 persons have been killed in the last couple of years by marauding herders who have laid siege to the community, taking over and destroying community farm lands for the grazing of their livestock, while killing and maiming members of the community in the process.[22] Similar attacks by herders have been reported in other communities and towns in Delta State, such as, Ubulu-Uku, Issele-Uku, Onicha -Olona, Onicha-Ugbo and other neighbouring towns and communities in Aniocha North and Aniocha South Local Government Areas of Delta State.[23] There have been reports of herders' attacks on host communities in Abraka and Idjerhe and surrounding communities. [24] At Okpanam, in Oshimili North LGA, two members of the local vigilante group were

[18] Amnesty International, 'Nigeria: The Harvest of Death - Three years of Bloody clashes between Farmers and Herders in Nigeria, 2018. <https://www.amnesty.org/en/documents /afr44/90503/2018 > accessed 20 May, 2024.
[19] Ogunyemi (n.4).
[20] K. Famuyiro, 'Proscription of Open / Everywhere Grazing System', *This Day* (Abuja, 30 January, 2017 <https://www.thisdaylive.com> accessed 27 August, 2022.
[21] *Ibid*; Ikhilae (n 14); Oyeyipo and James (n.14).
[22] A. Ogbogu, 'Stronger Delta Strider as Okowa Enthrones Stability through Open Grazing Ban'. *The Pointer*, (Asaba, 31 May, 2022) 10-12.
[23] *Ibid.*
[24] M. Osayande, Delta Monarch Laments Farmers killing. as Police Recovers ₦3M from Kidnappers', *The Guardian* (Lagos, 25 May, 2025) <https://guardianing > accessed 08 July, 2025.

reported killed by suspected herders.[25] Similar reports indicate the killing of two farmers on their way to the farm at Umunede and Mbiri, two neighbouring communities in Ika North East LGA of Delta State.[26] There are reports of 40 flash points in 12 Local Government Areas of Delta State that have been identified as sites of herders-farmers clashes.[27]

There is hardly any community in Delta State that is not facing the challenge of herders in one way or another. The Delta State Government has made efforts to enhance security in the state by seeking to check the constant farmer-herders clashes through the Delta State Community Security Agency Corps Bill which has not only gone through second reading but has just been passed into law by the State House of Assembly.[28]It should be a welcome development as it has been reported that there has been a rise in herders attacks, cases of rape by herders, abductions and kidnappings for ransom of farmers and members of host communities across Delta State and other parts of the Niger Delta region.[29]Very recently, a young female graduate, working as a land agent for a real estate company was kidnapped on site at Ibusa, near Asaba by herders who gang raped and subsequently murdered her. The spate of kidnapping, rape and extortion by armed herders has become so unbearable that residents of Abraka community and environs in Delta have had to call for help in protest against the kidnappings and the menace of the herdsmen in their community.[30]

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[25]*Ibid.*

[26] M. Ochei, 'Tension Grips Delta Communities as two die in Farmers, Herders Clash', *Punch Newspaper* (Lagos, 29 January, 2025) < https://punching.com> accessed 08 July, 2025.

[27] E. Ibrahim, 'Delta State and Farmers/Herders Clashes in Communities', *Voice of Nigeria* (Lagos, 09 February, 2023; A. U. Ofuoku and B.I. Isifo, 'Nomadic Cattle Herders Conflict In Delta State, Nigeria', *International Journal of Agriculture Extension and Rural Development* (2019) 7(1) 1-8; N.S. Ikenyei, 'The Dynamics of Herdsmen and Farmers Conflicts in Abraka, Delta State', *Global Journal of Applied Management and Social Sciences* (2020) 20, 147-155.

[28] J. Obikeze, 'Delta State Community Security Corps Agency Bill, 2025 Scales Second Reading' <https://www.facebook.com/share/p/15t2BH4CQI/?mibextidF2i> accessed 20 July, 2025.

[29] PIND Foundation, 'Sportlighting Herder- Farmer Conflict in Delta *Niger- Delta Wee*kly' (23-29 February, 2020) <https://pindfoundation.org> accessed 08 July, 2025; J. Idowu, 'Land Agent Killing: Delta Gov's Aide Laments Rise in kidnapping' *Punch Newpapers* (Lagos, 28 March, 2025); E. Amaize, 'Anti-kidnapping Protest: Security Operatives, Raises Storm in Delta State', *Vanguard* (Lagos, 7 June, 2025) < https://www.vanguardngr.
com> accessed 08 July, 2025.

[30] Amaize *Ibid.*

In addition to the farmers-herders clashes, open grazing contributes to environmental degradation and pollution in Delta State. It leads to the pollution of village streams and other water bodies and negatively impacts the local sanitation.[31] It also leads to overgrazing of land which can lead to erosion, deforestation, desertification, biodiversity loss, public health concerns, global warming and climate change amongst others.[32]

The livestock herds in Nigeria are sustained mainly by open grazing. This is because it is the culture and way of life of the Fulani people, who owns over 90% of the cattle herds and are the main herders of livestock in Nigeria. The Fulani tribe is found in Nigeria and in the Sahel regions of West Africa.[33] The challenges of resource scarcity, desertification and climate change are forcing the herders and their livestock into a North-South or Southward and downward migration, thereby increasing competition with farmers for grazing resources and space, which increases the propensity and capacity for conflicts between farmers and herders as they migrate southwards.[34] The Southward migration of herders and livestock has been encouraged by factors such as increased population, urbanization and agricultural intensification.[35] The Southward migration is also aided by the Economic Community of West African States (ECOWAS) protocol on the free movement of livestock

and herders within the West African sub-region.[36] This treaty explains why there are many foreign herders and their livestock in Delta State and other states in Nigeria engaging in open grazing.[37] The problem of the North-South migration of herders and livestock is worsened by the inability of the Federal Government of Nigeria to effectively police and secure the porous national borders, thereby making the influx of herders,

[31] E.E.O. Chukwuemeka, A. Aloysies and M. I. Eneh, 'The Logic of Open Grazing in Nigeria: Interrogating the Effect on Sustainable Development', *International Journal of Family Business and Management Studies,* (2018) 2(1) 2-4.
[32] K. E. Ukhurebor and C.O. Adetunji, 'Environmental Impact of Open Grazing in Nigeria', *Nigeria Journal of food- Drug and Health Law* (2020) 9, 8-12.
[33] *Ibid*, Chukwuemeks *et al.* (n.31) 1-5.
[34] E. lbrahim (n.27); Ofuoku and Isifo (n.27); Ikenyei (n.27).
[35] K.O. Mrabure and U.V. Awhefeada, 'Appraising Grazing Laws in Nigeria. Pastoralists versus Farmer', *African Journal of Legal Studies* (2020) 12, 302-304.
[36] Economic Community of West African States (ECOWAS), '21st Conference of Heads of State, Decisions A/DEC. 5/10/*Official Journal of the Economic Community of West African States (ECOWAS)* 98' (1998) 35, 3-7.
[37] K.E. Ukhurebor and C.O. Adetunji, 'Climate Change and Open Grazing: The Nigeria Perspective' *Nigerian Journal of Food, Drug and Health Law* (2020) 9, 3-4; Azomani (n 14) 73-74.

illegal aliens and criminal-minded persons into Nigeria for open grazing much easier.[38]

It is pertinent to note that farmer-herder conflicts are not new to Nigeria, as they can be traced back to the 20th century with the movement of herders in search of pasture and water for their animals.[39] It has been reported that Fulani herders have invaded communities in several African countries such as Nigeria, Mali, Mauritania, Niger, Ghana, Ivory Coast, Senegal and Congo resulting in killings and destruction of property, but Nigeria remains the worst hit in terms of Fulani herders' attacks on farmers and host communities.[40]The Global Terrorism Index (GTI) in 2017 reported that about 3,000 deaths occurred between 2010 and 2016 as a result of Fulani herders attacks in four countries with Nigeria accounting for 92% of the deaths.[41]

The culture of open grazing has also been sustained in Nigeria by the insufficiency of laws, inadequate legal framework to regulate open grazing practices in Nigeria, and the inaction by the Federal Government of Nigeria in failing to enact Anti Open-Grazing Law, thereby leaving states to enact state-level anti-open grazing laws.[42]

The primary concern of any government is the security and welfare of its citizens.[43]Therefore, a jurisprudential look at the Delta State Livestock Breeding Rearing and Marketing Law, 2021, considering the dynamic nature of the concept of law, shows that the law changes with time and place due to the evolving needs, or desire for change in society.[44] The purpose of law therefore is to secure social justice, as law is an instrument of justice. This is because law seeks to ensure the satisfaction of human wants within the society it governs.[45] The challenges posed by open grazing in Delta State and other states in Nigeria point to the fact that there are human wants, needs or desires, such as peace, security and the welfare of the citizens in Delta State, which have to be met by society and the Government of Delta State so that some level of social justice can be achieved to address societal needs. This is why it is very necessary for Delta State to have the Anti-open Grazing law, 2021 to

[38]*Ibid*; Nnoruga (n.15) 386-387.
[39] Gusa and Tijah (n.4) 76.
[40]*Ibid*.
[41]*Ibid.*
[42] Mrabure and Awhefeada (n.35) 306-310; Azomani and Gasiokwu (n.3) 225-226.
[43] s.14(2)(6) CFRN, 1999 (as amended).
[44] A. Taiwo and I.J. Koni, '*Jurisprudence and Legal Theory in Nigeria'* (Princeton & Associates Publishing Co.Ltd) 291-292.
[45]*Ibid*; Azomani (n.14) 90-91.

address and mitigate the problems and challenges posed by open grazing in Delta State.[46]

4.The Legality and Constitutionality of The Delta State Livestock Breeding, Rearing and Marketing Regulation Law, 2021

The issue of the legality and constitutionality of the Delta State Anti-Open Grazing Law, 2021 and the Anti-open Grazing Laws of states in Nigeria was earlier resolved by the Courts in the precedent set in the case of *Attorney General of Benue State v Attorney General of the Federation & 2ors.*[47] Where the Court declared that the Anti-Open Grazing Law of Benue State, 2017, and by extension the Anti-Open Grazing Law of Delta state, 2021 and the other states Anti-Open Grazing laws are constitutional and therefore legal. The court in its judgment relied on the views of Uwaifo JSC, that Nigeria operates a federal system of government.[48] And as such, the federal nature of the Nigeria constitution and our system of Government guarantees the autonomy of each tier of Government in Nigeria. Therefore, none of the tiers of Government in Nigeria should be subordinate to the other, because the State Government and Federal Government are autonomous, entities fromeach other and are free to exercise their respective will in the conduct of the affairs of their respective Governments as provided by the Nigeria Constitution.[49]

The implication of this is that the Nigeria constitution contemplates a dual system of enactment made up of states and federal laws because of the federal nature of the Nigeria constitution.[50] Under the Nigeria federal system, each tier of Government has its legislative powers or functions conferred on it by the Nigeria constitution. While the National Assembly legislates for the Federal Republic of Nigeria or any part thereof. The State House of Assembly legislates for each State of Nigeria in respect of the subject matters assigned to them by the constitution of Nigeria.[51] Each tier of Government in Nigeria must make laws for peace, order and

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[46]*Ibid.*

[47] Suit No. PHC/MKD/CS/56/19 (Federal High Court, Markurdi Judicial Division, 3rd February, 2020); A. Aligba, M. Omanchi and T. Gbakighir, 'The Open Grazing Prohibition and Ranches Establishment Law, 2017 and Ruga Settlement Policy of the Federal Government: Constitutional Implications *Benue State University Law Journal* (2018) 9(8) 172-197.

[48]*Attorney General, Benue State & Or v. Attorney General of the Federation & 2Ors*.

[49] s. 2(2); s. 3(1) and s. 6.CFRN, 1999 (as amended); *Olafisoye v. Federal Republic of Nigeria* (2004) 4NWLR (Pt861).

[50] A. Ogunba, 'An Appraisal of the Evolution of Environmental Legislation in Nigeria', *Vermont Law Review*, (2016) 40, 689 – 692.

[51] Aligba *et al*. (n.47) 187-188.

good Government in their respective territories and to ensure the security and welfare of the citizens within their sphere.[52] Matters not defined in the exclusive legislative list and concurrent legislative list become residual matters, exclusively reserved for a State House of Assembly alone to make Laws on.[53] The Federal Government and the States Governments can legislate on the matters in the concurrent list, matters in the exclusive list are exclusively reserved for the Federal Government of Nigeria to legislate on.[54] The Delta state Livestock, Breeding, rearing and Marketing Law, 2021, is a law that has been validly passed by the Delta State House of Assembly following all due processes under the constitution and properly assented to by the Governor of Delta state; it is therefore constitutional and legal.[55]

In upholding the legality and constitutionality of the Anti-Open Grazing Laws of the States in Nigeria, the court further held that regional Laws were no longer operative in Nigeria, but State Laws and as such that regional laws cannot override the Anti-Open Grazing Law enacted by any State Houses of Assembly anywhere in Nigeria now.[56] In the absence of any Federal Anti-Open Grazing Law or Act, the Anti-Open Grazing Law that has been enacted by a state Houses of Assembly such as Delta State Anti-Open Grazing Law, 2021 is the most current and existing grazing law and further validating the constitutionality of the Delta State Livestock, Breeding, Rearing and Marketing Regulation Law, 2021 and other state Anti-Open Grazing Laws.[57]

The constitutionality and legality of the Anti-Open Grazing Laws of the States in Nigeria was also tested and validated in several cases, including:[58]*Attorney General of Benue State & Ors v Inspector General of Police (IGP) & Ors;*[59]*Aliyu Ahmed & Anor v National Assembly & 13 Ors;*[60]and *Attorney General of Benue State v Attorney General of the Federation.* In *Attorney General of Benue State & Ors v Inspector General of Police (IGP) & Ors*, the court held that the Open Grazing

[52] s. 4(4)(a) & (b) CFRN 1999 (as amended).; *Emolua v. The State* (1988) 2NWLR (PT. 78) 524.
[53]*Attorney General of Ondo State v. Aberuagba* (1985) NWLR (PT. 3) 395; Part 1 of the Second Schedule to the CFRN, 1999 (as amended).
[54]*Ibid.*
[55] Ogunba (n.50) 689-692; see also n.52.
[56] Attorney General of Benue State v. Attorney General of the Federation and 2Ors (unreported, PHC/MKD/CS/59/19); Aligba et al (n 47) 175-188
[57]*Ibid.*
[58] Gusa and Tijah, (n.4) 77-87.
[59] Suit No. MHC/395/2018 (Benue State High Court, 25 January, 2019).
[60] Suit No. FHC/ABJ/CS/527/2017(High Court Abuja, 4 July, 2019).

Prohibition and Ranches Establishment Law, 2017 of Benue State was very validly enacted by the House of Assembly of Benue State, in exercise of the powers under Section 4(6) and (7) of the Constitution of the Federal Republic of Nigeria 1999 (as amended) which entitles it to do so.[61] In *Aliyu Ahmed & Anor v National Assembly & 13 Ors,* where a group of herdsmen challenged the constitutionality of the Benue State Open Grazing Prohibition and Ranches Establishment Law, 2017. The suit was dismissed by the Court which affirmed that the law has been duly and lawfully enacted by the Benue State House of Assembly and assented to by the state Governor and therefore legal.[62]

All of these court decisions, by the principle of *stare decisis*, do bind relevant courts and serve to validate the Anti-Open Grazing Law of Delta State and other States in Nigeria. In further validation of the Anti-Open grazing laws, the court held that the Anti-Open Grazing Laws were still in force as none of them had been set aside by any Court of Law or Court of competent Jurisdiction in Nigeria.[63] The courts have also validated the Delta State Anti-Open Grazing Law, 2021 by affirming the rights of states to implement the Anti-Open Grazing Laws in their domains and have directed the Nigeria Police Force to enforce the Anti-Open Grazing Law in the states.[64]

Legal experts also agree that the ban on Open Grazing by the Delta State Anti-Open Grazing Law and the Anti-Open Grazing Laws by states in Nigeria are constitutional and therefore legal, because the practice of open grazing has become hazardous, as it threatens the peaceful coexistence of Nigerians. There should be no legal squabbles as to whether or not the practice of open grazing should be banned by the states through the enactment of Anti-Open Grazing Laws.[65] Legal experts argue further that the Governor of a State is the ultimate decider of the usage of the land in a State, by the provisions of section 176(1) and sections 214 -216 of the Nigeria Constitution.[66] By the provisions of

[61] *Ibid.*
[62] *Ibid.*
[63] *Ibid.*
[64] Premium Times, 'Court Affirms Right of State, Police to Enforce Anti-Open Grazing Law' *Premium Times* (Abuja, 20 May, 2021) <https://www.premiumtimesng.com> accessed 20 July, 2025.
[65] The Guardian, 'Human Rights are not Animal Rights, (HURIWA) tells Malami' *The Guardian* (Lagos, 21 May, 2021) <https://guardian.ng/news/human-rights-are-not-animal-rights-huriwa-tells-malami/> accessed 6 October, 2023; O. Okhuevbie 'Open Grazing Ban: Ozekhome Blasts Malami, Says Spare Parts Dealers Pay Taxes', *The Independent News* (Lagos. 21 May, 2021) <https://independent.ng/open-grazing-ban-ozekhome-blasts-malami-says-spare-parts-dealers-pay-taxes/> accessed 6 October, 2023.
[66] *Ibid.*

section 1, Land Use Act, 1978, all land in the territory of a State in Nigeria, including Delta State, vests in the Governor of that State, to be held in trust and administered by the Governor for the use and common benefit of all Nigerians. The Governor can therefore initiate the enforcement of Laws to regulate land use in their state.[67]

In addition, the forest reserves in Delta State are owned and run by the Delta State Government and are regulated by the laws enacted by the Delta State House of Assembly.[68] The power to approve the physical planning and development of Land in the State is the exclusive duty and responsibility of the Delta State Government.[69] The combined effect of the Land Use Act, 1978, regional planning laws and the forestry laws currently applicable to Delta state, makes it a criminal offence to occupy any part of the forest reserves or land in Delta State without the authorization of the Delta State Government.[70] Therefore nothing should delegitimize, invalidate or criminalize the Delta state livestock Breeding, Rearing and Marketing Regulation Law, 2021 or the Delta State Anti-Open Grazing Law, 2021. The Delta State Government is in full charge and control of the land and forests of the states. It is therefore misleading for anybody to argue that herders and their livestock have unfettered and unquestionable access to graze their cattle and livestock anywhere on any land or forest within Delta State without the authorization of the appropriate authorities, which in this case is the State Government which has aptly and properly enacted the Delta State Anti-Open Grazing Law to regulate grazing and other aspects of livestock business in Delta State.[71]

Furthermore, the fundamental rights contained in the constitution of Nigeria are not absolute rights because under certain circumstances, these rights can be curtailed by allowing any law that is reasonably justifiable in a democratic society, in the interest of defence, public safety, public order, public morality or public health.[72] Considering the incessant senseless killings, wanton destruction of property and the

[67] *Ibid.*

[68] Delta State Forestry Law 1998 and Delta State Ecology Law, 2006. Are good examples of laws made by the State House of Assembly. Other States have similar laws and provisions.

[69] s. 33, Delta State Urban and Regional Planning Law, 2008.

[70] s. 31(a). Delta State Forestry Law, 1998; s.31(e), Delta State Forestry Law, 1998; s.31(g), Delta State Forestry Law, 1998.

[71] F. Falana, 'Northern and Southern Governors have banned open graving in Nigeria'. Vanguard (Lagos, 14 August 2021) < httpps//www.vanguard.com/2021/08/northen-and-southern-governors-have-banned-open-grazing-in-nigeria> accessed 6 October,2023.

[72] Okhuevbie, (n.65); s. 45 CFRN 1999(as amended).

displacement of people due to the farmers – herders conflicts and other related crimes in Delta State and Nigeria as a result of open grazing, this qualifies as part of the conditions prescribed by the Nigeria constitution, as a pretext to restrict movement and curtail certain rights and freedoms.[73] This is as provided for under section 45 of the Nigeria Constitution and as such Delta State Anti – Open Grazing Laws, 2021 was enacted in the best interest of the public safety, public order, public defense and public morality.[74]

Experts maintain that the Delta state Anti – Open Grazing Law and the Anti-Open Grazing Laws enacted by states do not in any way impede the constitutional rights of herders to own cattle or livestock as claimed in some quarters, but they only limits the ability of herders and livestock to openly graze on land anywhere or everywhere in the state, in order to avoid conflict with farmers and host communities.[75] The Delta State Anti – Open Grazing Law did not ban the freedom of movement of herdsmen in the States as some claim, but rather the Law only banned the movement of cattle and livestock from one place to another for the purpose of open grazing in Delta State.[76] This paper will now provide an overview of the Delta State Livestock Breeding, Rearing and Marketing Regulation Law, 2021, (the Delta State Anti – Open Grazing Laws 2021).

5. **An Overview of Delta State Livestock Breeding, Rearing and Marketing Law, 2021 (Delta State Anti-Open Grazing Law, 2021)**

Delta State was the host state when the Governors of the Southern States of Nigeria met on 11th May, 2021 to issue the directives to states in Nigeria to enact Anti – Open Grazing Laws.[77] In keeping with the 1st September, 2021 deadline given by the Governors for the states to enact the Anti – Open Grazing Laws.[78] The Delta State Government enacted a law to provide for the regulation of livestock, breeding, rearing and marketing and to prohibit open grazing and other related matters.[79] This is the Delta State Anti-Open Grazing Law, 2021, which is divided into two parts and contains twenty-eight (28) sections.[80]

The law also establishes the Delta State, Livestock Management Committee, saddled with the responsibility for implementing and

[73] *Ibid.*
[74] *Ibid.* Azomani (n.14) (97-98).
[75] *Ibid.*
[76] Okhuevbie (n.65); Falana (n.71).
[77] Egede, (n.1) 1-3.
[78] Idowu (n.5).
[79] (n.2).
[80] *Ibid*; Idowu, (n.5); Ahon (n.1).

achieving the objectives of the law earlier stated in this paper.[81] The law provides for the establishment and composition of the Delta State Livestock Management Committee with the Commissioner for Agriculture and Natural Resources as the Chairman and the Director of Livestock Services, Delta State as the Secretary by the provisions of section 3(1) and (2) of the Law.[82] While the functions of the Delta State livestock Management Committee has been clearly spelled out by the law in section 4(a) – (g).[83] The law provides that apart from the ex-official members of the Committee, members shall serve a term of four (4) years and may be reappointed for a second term of four (4) years and no more, according to section 6 (1) of the law. The law provides in section 7 and 8 respectively that the members of the Committee shall be paid allowances as the Governor of Delta State may determine and the activities of the Committee shall be funded by the office of the Governor of Delta State.[84]

The law in section 9, gives a transition period of about three (3) months from the Governor's assent to allow for the designating, securing and establishing of the designated areas or private ranches for livestock business by the Committee. The law provides that the designated areas established under the law by the provision of section 10(1) shall have a minimum of 5,000 square metres of land and must include an abattoir, a veterinary clinic, livestock market, an administrative office and a security post. The Committee, according to section 10(2) and (3) of the law can also designate an abattoir or a livestock market for the purpose of buying and selling livestock in the state and such a place so designated must have a veterinary officer.[85] The law in section 11(1) and (2) (a) to (d) provides for the establishment and composition of a Special Task Force in each Local Government Area of Delta State, to be chaired by the Local Government Area Chairman or his representative and with the Head of Personnel Management of the Local Government Area Council, as the Secretary amongst other members so as to ensure a state wide implementation of the law.[86]

The law in section 12(1) and (2) forbids the owners of livestock from allowing them to wander off or be at large.[87] The Law clearly defines in section 13(a) to (e) what constitutes activities in the field of livestock

[81] s. 3(1) Delta State Livestock Breeding, Rearing and Marketing Regulations Law, 2021.
[82] *Ibid*.
[83] *Ibid*.
[84] *Ibid*.
[85] *Ibid.*
[86] *Ibid.*
[87] *Ibid.*

production in Delta State to include, having custody or control of livestock in a designated area or private ranch, the establishment and operation of private ranches, livestock breeding, production or rearing, livestock trade, processing or marketing and any other activity that may be determined as such by the Commissioner, Ministry of Agriculture and Natural Resources and by a regulation issued in line with section 13 of the law; which allows the Commissioner for Agriculture and Natural Resources to make such regulations on the activities in the field of livestock production.[88] The law bans and criminalizes open nomadic livestock rearing and grazing in Delta State and provides that any action which contravenes Section 12 of the law, shall be liable to a term of two (2) years imprisonment or a fine of five hundred thousand naira(₦500,000) or both. Where the violations of the law according to section 15(1) and (2) lead to the damage or destruction of the crops and property of any person. The owner or manager of such livestock shall be required to pay for the damages to the crops and properties destroyed as evaluated by the Committee.[89]According to section 17(1) and (2)(a) of the Law, in the case of injury to any person as a result of the violation of the law, the owner or manager of the livestock shall be liable to not more than a term of two (2) years imprisonment and shall in addition pay any medical fees for the injured person and such other compensations as the Court may order. Where the violation leads to the death of any person within the state, the owner or manager of such livestock, shall in addition to criminal liability for causing the death of such a person, pay compensation to the family of the dead person as the Court may also order or determine.[90] The law in section 18(1) and (2) completely bans the movement of livestock from one destination to another in Delta state on foot. Such movement of animals is required to be by means of vehicle or wagons and should be done between the hours of 6.00am and 7.00pm daily. Any violation of this provision of the law for a first offender shall attract a fine of three hundred thousand naira (₦300,000) or six months imprisonment or both and for a subsequent offender, a fine of five hundred thousand naira (₦500,000) or one year imprisonment, or both.[91]The law in section 19 allows the livestock Management Committee or the Special Taskforce in the Local Government Areas to impound any livestock found to be at large and the owner of such livestock is liable to pay a fine of one hundred thousand naira (₦100,000) per livestock into the state coffers through the Delta State

[88]*Ibid.*
[89] *Ibid.*
[90]*Ibid.*
[91]*Ibid.*

Internal Revenue Service, as prescribed by the Committee.[92] Any impounded livestock not claimed by the owner or manager after seven (7) days of such impoundment shall be sold off at a public auction and the proceeds paid into the consolidated revenue account of Delta state by the provision of section 21(a) and (b) of the law.[93] The law also allows the owner of livestock to engage the services of registered security guards for the protection of the designated ranches in section 22 of the law.[94]Furthermore, the law prohibits in section 23(1) to (3) grazing land grabbing and the penalty for violation of these provisions can lead to imprisonment of up to ten (10) years without the option of fine. And where such land grabbing activities lead to the loss of life, the offender if found guilty shall pay compensation to the family of the dead person as the court may determine. In addition to the criminal liability, the court may order the eviction of the dependents of the land grabber from the land if they are found on the land.[95] The law in section 24(1) and (2)(a)(b) also criminalizes the rustling of livestock, and the penalty for offenders upon conviction is a term of three (3) years in prison and a fine of one hundred thousand naira (₦100,000) per animal or both. In the case of injuries or the maiming of any person while the offender is engaged in the activity of livestock rustling, he shall be liable on conviction to a prison term of five (5) years or a fine of five hundred thousand naira only (₦500,000) or both in addition to payment of compensation to the owner of the livestock as the court may determine.[96] The law, in section 25(1) and (2), prohibits the keeping, selling and slaughtering of any diseased livestock in Delta State and requires that any livestock for sale or slaughter in the state must be examined first by a Veterinary Officer, who shall certify that such animal is fit for human consumption. According to section 26 of the law, any offender under this provision is liable upon conviction to a term of six (6) months imprisonment or a fine of three hundred thousand naira (₦300,000) or both.[97] The law also provides that any person who slaughters any livestock that is not his own, is guilty of an offence and is liable, upon conviction, to one (1) year imprisonment or a fine of three hundred thousand naira (₦300,000).[98] Under section 27(1) of the law it is unlawful to operate or to be involved in livestock production businesses as outlined under section 13 of the law, without a license as provided for

[92]*Ibid.*
[93] *Ibid.*
[94]*Ibid*.
[95]*Ibid*.
[96]*Ibid.*
[97]*Ibid.*
[98]*Ibid.*

under Section 15 of the law. Any offender shall be liable to pay a fine of two hundred thousand naira (₦200,000) and shall be disqualified from being granted a license for a period of one year according to the provisions of section 27(2)(a) and (b) of the law.[99] Also, it is an offence under section 27(3) of the law to buy livestock from a place other than a livestock market. Violation of this provision attracts a fine of one hundred thousand naira (₦100,000) and the confiscation of the purchased livestock, which shall be sold according to the provisions of Section 21 of the law.[100] The law in section 28 provides that the trial of offences created under the law, will be by summary trial in the Magistrate Court, and where the Magistrate Court does not have jurisdiction, the High Court of Delta State will try such offences.[101]

6. **Enforcement of the Delta State Livestock Breeding Rearing and Marketing Regulation Law, 2021**

It is almost four (4) years since the enactment of the Delta State Livestock Breeding Rearing and Marketing Regulation Law and, like other states' Anti-Open Grazing Laws in Nigeria, it continues to face some challenges. These include poor enforcement, issues with implementation, resistance to the Anti Open Grazing Law by herders, and inadequate infrastructure for the establishment of ranches amongst others.[102] Enforcement is so important because, any law, no matter how well-crafted or enacted, remains a useless piece of paper if not properly enforced or implemented. The major problem with poor enforcement of the law is that it ensures the practice of open grazing continues in Delta State even though there exists a law banning or regulating the practice. This is exactly the experience with the Anti Open Grazing Law in Delta State since it came into force.[103] The problem of poor enforcement is due mainly to the fact that the Federal Security Agencies, such as the Nigeria Police Force, do not appear willing to enforce the law in Delta State. It is also a similar story in other states with Anti Open Grazing Laws in Nigeria.[104] This is even after the court has affirmed the right of states to implement the Anti-Open grazing law in their respective states and required the Nigeria Police Force to enforce the law.[105]The apparent opposition of the Nigeria Police Force to the enforcement of the Anti-Open grazing law reflects the position and attitude of the Federal

[99] *Ibid.*
[100] *Ibid.*
[101] *Ibid.*
[102] Azomani and Gasiokwu (n.3) 229-233.
[103] Gusa and Tijah (n.4) 91-93.
[104] *Ibid.*
[105] (n.65).

Government of Nigeria, in opposing the enactment of Anti Open Grazing Law by states in Nigeria.[106]There are also reports that the Federal Government of Nigeria has directed the Nigeria Police Force not to implement the Delta State Anti-Open Grazing Laws, thereby constituting a hindrance to the enforcement of the law in Delta State.[107]In Delta State, activists and some citizens have petitioned the Commissioner of Police over the breach of the Delta State Anti-Open Grazing Law by some Police Divisional Officers, following the unlawful release of some suspects who were violating the law.[108] In spite of the challenges in Delta State, reports indicate that the law is still being enforced, with the arrest and prosecution of some offenders, even though the exact figures are not available. There have also been reports of the seizure and impoundment of livestock in some parts of the state for violating the law. Thus, the law is still being enforced, but much work still needs to be done to give more bite to effective enforcement in Delta state.[109] Worried about the flagrant violation and the non-enforcement of the Delta State Anti-Open grazing law, the Delta State House of Assembly has directed all Local Government Area Council to put mechanisms in place to implement the law in their domains.[110] Secondly, the Delta State Anti-Open Grazing Law,2021 provides for the establishment of a Livestock Management Committee to implement the law in Delta State.[111]

The Committee was inaugurated by the then Governor of Delta State on 14th of December, 2021 less than 3 months after the law came into force. Recently, a committee of 45 persons and another 120-man Special Task force for the enforcement and implementation of the law was also inaugurated by the Commissioner for Agriculture and Natural Resources, Delta State, in exercise of the provisions of the law, for

[106] A. Malami, Southern Governors Ban on Open Grazing Violates the Constitution', *This Day* (Abuja, 20 May, 2021) <https://www.thisdaylive.com> accessed 14 July, 2022.
[107] M. Fatunmole, 'Nigeria Government Directing Police Not to Implement the Anti Open Grazing Law, *The ICIR* (2 September 2021) < https://www.icirnigeria.com) accessed 09 July, 2025.
[108] M. Ochei, 'Activists Petitions Delta CP Over Anti- Open Grazing Law Breeches by DPOs', *Punch Newspapers*. (23 January, 2025) <https:// punching.com) accessed 09-July, 2025.
[109] I. U. Momoh, 'Delta State Assembly seeks Enforcement of Anti-Open Grazing Law, *Daily Trust* (Abuja, 13 September) 1-3.
[110] M. Ochei, 'Delta Assembly Gives 17Day Ultimatium for Anti-Open Grazing Law Enforcement', *Punch Newspapers* (Lagos, 10 May, 2024) <https://punchng.com> accessed 20 July, 2025.
[111] s. 3(1) Delta State Livestock Breeding, Rearing and Market Regulation Law, 2021.

greater effectiveness.[112] However, the members of the Livestock Management Committee and the Special Task force set up to enforce and implement the law do not carry fire arms and may not be able to risk their lives against the main violators of the law such as, the herdsmen who are usually armed and ready to attack if confronted or challenged. The Nigeria Constitution gives only the federal government the power to approve or license the carrying of fire arms. The current unwillingness of the federal government to support the enforcement of the Anti-Open Grazing laws by the states makes it all the more difficult.[113]It is the same challenge in other states with Anti Open Grazing Laws in Nigeria.[114]Thirdly, another challenge facing the enforcement and implementation of the Delta State Livestock Breeding Rearing and Marketing Law,2021 appears to be the refusal of the herders to obey and abide by the Delta State Anti-Open Grazing Law, as they have continued to openly graze their cattle and livestock with impunity throughout Delta State, similar to the situation in other states with Anti-Open Grazing Laws in Nigeria.[115] The objective of the herders appears to be a deliberate and intentional instigation of violence with farmers and host communities for land grabbing purposes the Anti Open Grazing Laws appear to be a hindrance preventing them from achieving their objectives.[116]

With the Federal Government of Nigeria in total control of all the security agencies and unwilling to help implement and enforce the Anti Open Grazing Laws in Delta and other states in Nigeria, this further underscores the need for the creation of State Police in Delta State and other states in Nigeria to help enforce state laws, particularly, in

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[112] D. Ogunyemi, 'Delta Inaugurates Panel on Anti-Open Grazing Law' *Punch Newspapers* (Lagos, 25 April, 2023) <https://punching.com>accessed 09 July, 2025; M. Ochei, Delta Recruits 120 Officers to Manage- Herders/Farmers Clashes,' *Punch Newspaper* (20 September, 2024) < https://punching.com> accessed 09 July, 2025.

[113] Second Schedule, Port 1, item 2; 1999, CFRN (as amended).

[114] Gusa and Tijah (n.4) 91-93.

[115] News Net Nigeria, 'Anti Open Grazing: Herders Continue Activities with Impunity, One year after the law came into force in Delta < https://newsmet.ng/environment/nti-open-grazing-herders-continue-activities-on-the-impunity-one-year-after-law-come-into-force-in-Delta) accessed 10 January, 2024; A. Ogunda, 'Our Anti Open Grazing Law is flouted with impunity, Delta Assembly Lawmakers Lament *Delta News* (Asaba, 6 March, 2024) <https://thetownhall.com.ng/our-anti-open-grazing-law-is-flouted-wouth-impunity-delta-assembly-lawmaken-laments> accessed 7 March, 2024; O. Agbamu, 'Open Grazing: Delta Assembly to Prosecute Violators', Ndokwa *Vanguard* (Asaba, 7 March, 2024 < https://ndokwavanguard.com/2024/03/07/0pen-grazing-delta-assembly-to-prosecute-violators > accessed 8 March, 2024.

[116] Gusa and Tijah (n.4) 91-95.

situations where the violators of the law are heavily armed.[117] As a way of overcoming the challenges of enforcement and to check the herder-farmer attacks and enhance the security of host communities, some have advocated for community Policing efforts to be encouraged and sustained. The community policing initiative involves a collaborative approach between communities and security agencies by integrating the ommunity police and vigilante groups in host communities into the farmer-herder conflict resolution strategy.[118]It is believed that community policing will greatly help check the farmer-herder conflict and ensure food security and sustainable development by getting members of the community involved in the enforcement of the open grazing ban within the state.[119] Community policing is one of the community-based efforts that can help deal with the farmer-herder conflict in Delta State, in addition to other efforts such as community peace building efforts, through communities, early conflict warning systems that are community based, community-dependent and reliant, and mediation and dialogue efforts to avert these conflicts in Delta State.[120]The Delta State Government has aligned with the community policing initiative to complement the efforts towards the enforcement of the Anti-Open Grazing Law and addressing the challenges of Open grazing with the Delta State House of Assembly recently passing the Delta State Community Security Law.[121]

The enactment of the Delta State Livestock Breeding Rearing and Marketing Regulation Law, 2021 has no doubt helped enrich the body of laws in Delta.

7. **Conclusion**

It is clear that the Delta State Livestock Breeding Rearing and Marketing Regulation Law, 2021 or the Delta State Anti-Open Grazing Law,2021 is a step in the right direction by the Delta State Government in the discharge of its constitutional duty of ensuring the security and welfare

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[117] P. O. Osunyikanmi, 'Herders-Farmer Conflict and the Call for State Police in Nigeria', *International Journal of Development Strategies in Humanities, Management and Social Science* (2019) 9, 28-32.

[118] D. Ogunyemi, 'Delta Seeks Solution to Farmers-Herders Clashes', *Punch Newspaper* (Lagos, 3 March, 2025) <https://punchng.com> accessed 20 July, 2025.

[119] A. A. Yahaya and E.A. Agbaide, 'Assessment of community based security measures currently in place to address Herders-Farmers conflicts in Delta State; *Journal of Humanities and Social Sciences* (2024) 29 (12) 40 -43.

[120]*Ibid.*

[121] Spade Nigeria, 'DOPF Congratulates Delta Assembly on Passage of Community Security Bill, Urges Governors Swift Assent' (Nigeria, 25 July, 2025) <https://www.sapdenigeria.com/dopf-congratulates-delta-assembly-on-passage-ofcommunity-security-bill-urges-governors-swift-assent> accessed 28 July, 2025.

of the citizens of Delta State by seeking a solution to the incessant violent clashes between farmers and herders and their related challenges. Dwindling land and grazing resources, climate change, desertification and the North-South migration of herders and livestock amongst other factors have helped to fuel the farmers and herders' conflicts. This paper finds that the practice of open grazing is unsustainable not only in terms of violence resulting from farmer-herder clashes, but also due other related challenges in Delta State. The adoption of more sustainable grazing practices as advocated by the law would help avoid the conflicts. While the support and cooperation of the Federal Government of Nigeria and security agencies is necessary for the effective enforcement of the Anti-Open Grazing Law in Delta State. There is a need for the integration of modern and traditional conflict resolution strategies, including the use of community policing, community peace initiative, mediation and dialogue to effectively enforce and implement the Anti-Open Grazing Law and tackle other related challenges of open grazing in Delta State.

8. **Recommendations**

i. The Delta state Government should show more commitment and determination in the enforcement and implementation of the Delta State Anti-Open grazing law.

ii. The Federal Government should enact a federal Anti-Open Grazing Law (Act) to complement the efforts of Delta state and other states in Nigeria in regulating the practice of Open grazing.

iii. The Federal Government and the Security Agencies, such as the Nigeria Police Force should support the enforcement and implementation of the Anti-Open Grazing Law.

iv. There is a need for a constitutional amendment or review to allow for the creation of state Police to help States, like Delta State to better enforce the Anti-Open Grazing Law and other relevant state Laws.

v. The Delta State Government should continue to engage with the herders, farmers, host communities and other stakeholders on the need for peaceful co-existence through community peace and confidence building measures such as community peace initiative, community policing, community early conflict warning system, mediation and dialogue for the effective enforcement and implementation of the open grazing ban in Delta State.