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Mary Imelda Obianuju Nwogu
Lecturer, Faculty of Law
Nnamdi Azikiwe University,
Awka, Nigeria

The protection of digital works under the Nigerian copyright law

Mary Imelda Obianuju Nwogu

Abstract

Scientific and technological innovations have brought changes in the world order affecting all aspects of the human economy and the legal systems. The wealth of any nation is largely hinged on the creativity of its citizens. This intellectual creativity needs to be protected by law so that one will reap from the fruit of his labour. Inclusive in the intellectual creativity that needs protection is the digital Copyright works. The provisions of the Nigerian Copyright Act ^[1] inadequately protects digital works in the country. The digital works protected are satellite and cable broadcast, and computer software. The owner of copyright in satellite or cable broadcast shall have the exclusive right to record and broadcast, communicate to the public and distribute to the public for commercial purposes. While computer software is protected as literary work, all rights that inure to literary works also applies to computer software. The protection of digital works are flout with challenges including inadequate legislation. Consequently it is recommended that adequate and separate legislation should be enacted to accommodate the inadequacies of the Copyright Act; introduction of technology to prevent piracy, public enlightenment and provision of adequate enforcement mechanism.

Keywords: Digital works, copyright act, Nigerian, innovations, broadcasting and computer software

Introduction

A nation's wealth and quality hinges on its creativity, particularly intellectual creativity. To encourage the citizens, it is important that this ingenuity and innovations be adequately protected by law. The law in its fluid state has challenges protecting emerging technologies in this area of law in Nigeria. These emerging technologies include digital technology of Copyright works such as radio and television broadcast (by cable and by satellite) and computer programmes. The cable and satellite broadcast could transcend national boundaries making effective control by present Copyright law and copyright owner very difficult.

Digital technology exerts far reaching impact on intellectual property because of its peculiar characteristics of easy replication, transmission, modification and manipulation ^[2]. In the copyright Arena, it raises issues related to protection of copyright works from unauthorized online exploitation, as well as mechanism for control and monitoring of works in the digital environment ^[3]. But then digital technology has so much advantage to the world order, Nigeria inclusive, because of its universality and reach. Thus the digital highway provides opportunities for the visibility of intellectual property, increase in market of the goods and economy of Nigeria.

The Copyright Act ^[4] which is a law of general application in Nigeria that governs the protection of right-holders provides for the works eligible for copyright as follows; literary works, musical works, artistic works, cinematograph films, sound recordings and broadcasts ^[5]. For literary, musical and artistic works to be eligible they must be original and fixed in a definite medium of expression ^[6]. The fore enumerated works encompasses digital innovations like computer software, satellite and cable broadcasts, cable distribution systems, audio and video recording and reprographic transmissions in all its forms.

¹ Ss. 8,9 and 51 of the Copyright Act, Cap C28 Laws of the Federation of Nigeria (LFN) 2004

² A.O Oyewunmi, Nigerian Law of Intellectual Property, University of Lagos Press 2015 p.335; P. Samuelson, "Digital media and changing face of Intellectual Property Law," Rutgers Computer and Technology Law Journal 1990, p.323

³ A.O Oyewunmi, Nigerian Law of Intellectual Property, University of Lagos Press 2015 p.336

⁴ Cap C28 Laws of the Federation of Nigeria 2004

⁵ S. 1 (1) Copyright Act.

⁶ S. 1 (2) *op cit*

Correspondence
Mary Imelda Obianuju Nwogu
Lecturer, Faculty of Law
Nnamdi Azikiwe University,
Awka, Nigeria

^[7] Notwithstanding the above, and especially the enormous benefits which the country has derived from copyright related products, Nigeria still remains the largest piracy destination and market in the world invariably in the same products ostensibly protected by the Copyright Act, particularly computer software ^[8]. This is due to the inability of the Act to meet contemporary challenges in the protection of copyrights of particularly new genres of innovations within the above broadly provided products. Also though Nigeria is signatory to various international conventions on copyright protection ^[9], some of these conventions are hardly enforceable in Nigeria because they have not been domesticated ^[10]. It is worthy of note that the United States of America has recognized the need to accord special protection to 'digital works by the enactment of the Digital Millennium Act of 1998 ^[11] unlike Nigeria that has not given such special recognition. There is urgent need for Nigeria to emulate the protection of digital works like the Americas because of the speedy growing technology of the world.

This article seeks to examine the extent of protection of Digital works by the Nigerian Copyright Act.

Meaning of copyright

Copyright, can be said to mean the exclusive right given to the right-holder under the law to reproduce, publish, perform, make adaptation, distribute, perform in public, communicate and license the work. Under the Copyright Act ^[12], the term 'copyright' is defined to mean copyright under this Act ^[13]. This definition begs the question for it has not stated the meaning of the word "copyright". Going through the entire gamut of the Copyright Act ^[14] one can say that Copyright is the exclusive right of the owner of Copyright to control doing of all the acts protected by copyright law such as reproduction, performance, broadcast, publication, communication to the public and making adaptations of the work. Bainbridge ^[15] on his part described Copyright as a property right which subsists in various works, for example literary works, artistic works, musical works, sound recordings, films and broadcasts ^[16]. Copyright is also an intangible, incorporeal right with fixed

duration. It protects the expression of ideas and not the ideas themselves.

Copyright' can be "licensed, transferred and/or assigned by the author of the work ^[17] and such an assignment with exclusive right to do an act must be in writing ^[18]. This was buttressed in Digital Communication network (Nig) LTD v NCC ^[19] wherein the Court of Appeal per Tur JCA held that "Copyright is transmissible by assignment, testamentary disposition or by operation of law, as movable property under Section 11(1) and (2) of the Act (supra). Subsections 11(3) and (4) of the Act provides as follows: "(3) No assignment of copyright and no exclusive licence to do an act, the doing of which is controlled by copyright, shall have effect unless it is in writing. (4) A non-exclusive licence to do an act, the doing of which is controlled by copyright, may be written or oral, or may be inferred from conduct." The protection offered by copyright is available to both published and unpublished works of authors. Copyright inures immediately a work is produced, therefore, there is copyright in the manuscript of a work.

Meaning of digital works

It is important and necessary to state the meaning of digital before proceeding. The Oxford Advanced Learners Dictionary ^[20] defines digit as any of the numbers from 0 – 9. While digital is using a system of receiving and sending information as a series of the numbers one and zero showing that an electronic signal is there or is not there ^[21]. The digital works subject to copyright are works that use information which is automatically a combination of discrete values rather than continuous value ^[22]. Satellite and cable Broadcast and computer software are by their nature's digital works.

Protection of digital works by the Nigerian copyright act

The Nigerian Copyright Act protects the following digital works; cable and satellite broadcast, and computer software. Satellite broadcasting involves the transmission of signals by wireless or electromagnetic means (consisting of discrete values), which when received by a suitable apparatus is converted into sounds and visual images perceived by humans ^[23]. Cable broadcast is the transmission of information in the form of electronic or optical signals transmitted through a cable or over a cable directly to a receiver ^[24]. While cable programmes are visual images, sounds or other information sent by means of telecommunication system otherwise than by wireless telegraph for reception at two or more places (whether for simultaneous reception or at different times) in response to request by different users or for presentation to members of the public ^[25].

⁷ Ss.!(1), S.51 *op cit*; S. Alikhan, "International Dimension of Copyright Protection – The Global perspective" Essays on Copyright Law and Administration, E.E. Uvieghara (Ed.), Y-Books 1992

⁸H.P. Faga and N. Ole," Limits of Copyright Protection in Contemporary Nigeria: Re-examining the Relevance of the Nigerian Copyright Act in Today's Digital and Computer Age", Nigeria Computer Software Protection in Nigeria, <http://www.lawedit.co.uk/viewarticle> accessed 4th April 2022.

⁹This includes the Berne Convention for the Protection of Literary and Artistic Works 1886, the Agreement on Trade-related Aspects of Intellectual Property Rights ('TRIPS Agreement') 1995, the World Intellectual Property Organization ('WIPO') Copyright Treaty, 1996, the WIPO Performances and Phonograms Treaty 1996, and the Rome Convention for the Protection of Performers, Producers of Phonograms and Broadcasting Organizations.

¹⁰ F.T. Okou, S. Okuo and B.O. Modey, "The Implication of Technology on Nigerian Copyright Protection Practices in Today,s Computer Age" Journal of Law, Policy and Globalisation, Vol 37 2015 pg 137.

¹¹ Detail solicitors Newsletter April 2009 Edition (WWW document), available at: URL:<http://www.detailsolicitors.com/newsletter> visited 4th April 2022: H.P. Faga and N. Ole *op cit*.

¹² S. 51 of the Copyright Act Cap C28 LFN 2004

¹³ Section 51 Copyright Act Cap C28 LFN 2004

¹⁴ Ss. 6, 7, 8, 9, 51 of the Copyright Act

¹⁵ D. Bainbridge, Intellectual Property, Pearson 2007

¹⁶ D. Bainbridge, Intellectual Property, Pearson 2007.

¹⁷ S. 11(1) and (2) of the Copyright Act.

¹⁸ S. 11(3) of the Copyright Act

¹⁹ 2013 LPELR 20797 CA

²⁰ L. Hey and S. Holloway (Eds) 2015, Oxford Advanced Learners Dictionary 9th Edition p. 427

²¹ L. Hey and S. Holloway (Eds) 2015, Oxford Advanced Learners Dictionary 9th Edition p. 427.

²² H.P. Faga and N. Ole *op cit*

²³ International Bureau of WIPO "The New Communication Technologies Copyright" WIPO/PO/ACAD/E/98/28; H.P. Faga and N. Ole *ibid*

²⁴ Arc Dictionary "Meaning of cable Broadcast"

URL:<http://www.arcdictionary.com/cablebroadcast/html>: H.P. Faga and N. Ole *ibid*.

²⁵ S. 51 of the Copyright Act.

Broadcast ^[26] “means sound or television broadcast by wireless telegraph or wire or both or by satellite or cable programmes and includes re-broadcast ^[27]. The effect of the definition of broadcast by the Copyright Act above, is that sound(audio) and audio-visual broadcasts using different technological media such as wire or wireless telegraphy are covered, consequently describing only the two modes of broadcast. Section 51 of the Copyright Act defines re-broadcast as simultaneous or subsequent broadcast of one broadcasting authority of the broadcast of another broadcasting authority; while Broadcasting Authority is any authority established under any Law in Nigeria or elsewhere providing broadcasting services for public reception.

Importantly, the nature of Copyright in a broadcast is clearly stated under Section 8(1) of Copyright Act thus; copyright in a broadcast shall be the exclusive right to control the doing in Nigeria of any of the following acts:

- a) Recording and broadcasting the whole or a substantial part of the broadcast
- b) Communicating to the public of the whole or substantial part of a television broadcast, either in its original form or in any form recognizably derived from the original.
- c) The distribution to the public for commercial purposes of the copies of the work by way of rental, lease, hire, loan or similar arrangement.

The exclusive right in a broadcast also covers the taking of still photographs from the broadcast.

Following from the above, it then means, that the right-holder in a broadcast must consent to the use of copyright work in such a broadcast before there is reception by the general public, subject to the exceptions stipulated in S. 8(3); paragraphs (a), (h), (k), (n) and (o) of the Second Schedule of the Copyright Act.

This was well enunciated by the Court of Appeal in Digital Communication network (Nig) LTD v NCC (Supra) ^[28] wherein it held thus:

"Copyright in a broadcast shall be the exclusive right to control the doing in Nigeria of any of the acts set out in Section 8(1)(a),(b),(c), (2) and (3) of the Act. Section 8(1)-(3) of the Copyright Act Cap C28 Laws of the Federation of Nigeria, 2004 reads as follows: "(1) Subject to this Section, copyright in a broadcast shall be the exclusive right to control the doing in Nigeria of any of the following acts, that is:- (a) The recording and the re-broadcasting of the whole or a substantial part of the broadcast; (b) The communication to the public of the whole or a substantial part of a television broadcast, either in its original form or in any form recognizably derived from the original; and (c) The distribution to the public, for commercial purposes, of copies of the work, by way of rental, lease, hire, loan or similar arrangement. (2) The copyright in a television broadcast shall include the right to control the taking of still photographs from the broadcast. (3) The exceptions specified in Paragraphs (a), (h), (k), (n) and (o) of the Second Schedule to this Act shall apply to the copyright in a broadcast, in like manner as they apply to copyright in literary, musical or artistic work or a cinematograph film." The word "exclusive" means "only to be used by one particular person or group; only given to one particular

person or group." See Oxford Advanced Learners Dictionary, 7th Edition, page 507."

In a situation where there is broadcast of creative works which have been lawfully included in a cinematographic film, the owner of the copyright shall be deemed to have authorized the broadcast. This is evident in section 9(1) of the Copyright Act which stipulates that; “where the owner of a copyright in literary, musical and artistic works authorizes a person to incorporate it in a cinematograph film and a broadcasting authority broadcast the film, the owner of the copyright shall, in the absence of any other agreement to the contrary between the owner and that person, be deemed to have authorized the broadcast”. Notwithstanding the above stated provision, S. 9(2) of the Copyright Act ^[29] is to the effect that fair compensation should be paid to the right owner of a musical work incorporated in a cinematograph film broadcasted by a broadcasting authority. One of the exclusive rights conferred to the copyright owner in a broadcast is communication to the public, hence the need to know the meaning of communication to the public under the Copyright Act. Under the Copyright Act ^[30] communication to the public “includes in addition to any live performance or delivery, any mode of visual or acoustic presentation but does not include a broadcast or re-broadcast ^[31]. From the definition of communication to the public under the Copyright Act, it then means that it excludes broadcast and re-broadcast. Which is to the effect that a radio or television station which reproduces without authority the broadcast of another radio or television station and rebroadcasts the same to the public has not infringed on the copyright of the right owner in a broadcast. This is in my considered opinion contrary to the definition of broadcast and deprives the right owner of his economic benefit and will consequently discourage creativity and innovation. There will also be constant abuse on the broadcasting right of a copyright owner.

Another digital work that the Law on copyright accords protection is computer software provided for under the definition section of the copyright Act as literary work.³² Computer software or programme is aptly defined as “a set of statements or instructions to be used directly or indirectly in a computer in order to bring about a certain result”³³. Consequently, any protection accorded to literary works is also applicable to computer software. Section 1 (1) and(2) of the Copyright Act enumerates works eligible for protection, and two conditions required for their eligibility, which are that sufficient effort must have been expended in the work to give it originality of character, and it must be fixed in a definite medium of expression now known or later to be developed ^[34].

The implication of the above provision is that for a computer software or programme to be accorded protection under the Nigerian copyright Law sufficient effort must have been put by the owner of the work to make it original and it must also be fixed in a definite medium of expression. The Copyright (Optical Discs Plants) Regulations 2006 was made in response to digital technology. This Regulation ^[35] provides the framework for monitoring and controlling the

²⁹ Copyright Act

³⁰ S.51 of the Copyright Act

³¹ S.51 of the Copyright Act

³² S.51 of the Copyright Act

³³ S.51 of the Copyright Act

³⁴ Ss. 1(1)(2); H.P. Faga and N. Ole *op cit*

³⁵ Paras 1, 2 and 3 of Copyright (Optical Discs Plants) Regulation 2006.

²⁶ S. 51 of the Copyright Act

²⁷ S. 51 of the copyright Act

²⁸ *Op cit*

production, duplicating, importation and exportation of optical discs, production parts and manufacturing equipment. Registration with the Commission is required of manufacturers, importers, exporters and those engaged in duplication of optical discs [36]. Paragraph 5(1) of the Copyright (Optical Discs Plants) Regulations 2006 provides that every registered person shall cause each optical disc and each production part manufactured by it in Nigeria to be marked with the appropriate manufacturer's code as may be prescribed by the Commission. Para 7 [37] specifies that Source Identification Code (SID) or any other anti-piracy device be applied on every optical disc produced.

Ownership of copyright vests first in the author [38] with exceptions as provided under the Act [39]. Consequently ownership of a computer software, cable and satellite Broadcast vests in the first instance in the author, subject to; where there is contrary stipulation in a written contract [40]; involves proprietor of newspapers, magazines etc for the purpose of publication and works of Government. Copyright owner of computer programmes has been vested with the exclusive right to reproduction [41], distribution to the public [42] and make of adaptations [43].

The enjoyment of exclusive economic right in a copyright work is not forever, it has fixed and limited duration. Under the Copyright Act [44] the duration of Copyright in broadcast is fifty years after the end of the year in which the broadcast first took place. While that of literary work which includes computer software is seventy years after the end of the year in which the author dies. In my view the copyright duration encourages creativity, for it avails the right owner of the opportunity of reaping from the fruit of his labour for a relatively long time.

Challenges in the protection of digital copyright works

The challenges in this new technological development abound ranging from inadequate legislation to inadequate knowledge by the public of the existence of such technology and the laws regulating the subject matter under consideration.

Digital technology poses new challenges to copyright owners. The digitization of entertainment products and processes of creation has drastically increased the rate of piracy in Nigeria for example, Nigerian films are digitalized and distributed online globally, also CDs and DVDs are pirated and sold [45]. The Copyright (Optical Disc Plant) Regulation 2006 is also inadequate in its protection of online distribution of Copyrighted works.

Consequently there is lack of adequate legislation in Nigeria for the protection of digital Copyright works which has partly contributed to the high rate of piracy in Nigeria and the cyberspace. The definition of Communication to the public is grossly inadequate, for among other deficiencies excludes broadcast and re-broadcast.

Under the Nigerian Law the creator of a computer language is not entitled to a separate copyright on the language alone under the Copyright Act [46] because for there to be copyright in computer software it must satisfy the requirement of originality and fixation under the Copyright Act. This is not so for instance, in the Law of the United States of America [47].

There is limited protection of computer works under the Nigerian Copyright Act to the extent that what should amount to piracy is not. For example, we have a form of copyright infringement of computer software known as re-bundled software which is the assembling of diverse parts of legitimate software components by technical means and re-bundling these different parts manufactured by different companies and giving it the name of a major software company. The aftermath of the whole story is that recent technological advancements have actually exposed the loopholes of copyright protection, especially in Nigeria [48]. However it is important to state that some of the Nigerian populace are not aware of the existence of this subject and the extent of its protection and the enormity of rights available to them.

Recommendations

Considering the challenges facing the copyright regime in modern digital technology, it is my considered opinion that there is urgent need to tackle and remedy the situation and this certainly has to do with bringing to bare necessary and curable measures such as: technology, legislation, administration, and Public enlightenment [49].

The use of modern and effective technology for the protection of digital innovations is very important to prevent piracy and all sorts of online infringement, such as use of digital signature and key encryption [50] by cable operators to restrict the unauthorized use of their transmissions.

In my earlier discussions, the inadequacy of the Copyright legal framework has been particularly stated. To make up for this it is my considered opinion that separate and comprehensive legislation be enacted by the National Assembly to include digital innovations as in the United States of America Digital Millennium Copyright Act 1998. Some of the provisions of International Instruments like WIPO Copyright Treaty (WCT) protecting digital innovations should be incorporated into Nigerian Copyright law.

When adequate laws has been enacted as proposed, adequate enforcement measures must be put in place and enforcement ensured by appropriate authority such as the Nigerian Copyright Commission.

The public should be educated and enlightened on the existence of these rights, the menace of the infringement of the said rights and that they should be vanguards to the protection of such rights and fight against its infringement. This can be done using public announcements, radio and

³⁶ Para 3 and 4 of the Copyright (Optical Discs Plants) Regulation 2006.

³⁷ Copyright (Optical Discs Plants) Regulation 2006.

³⁸ S. 10(1) of the Copyright Act.

³⁹ S.10(3)(5) of the Copyright Act.

⁴⁰ Proviso to s.10(2) of the Copyright Act

⁴¹ s. 6 (1) of Copyright Act, Op. cit., note 3.

⁴² s.6 (1) (a) vii, *ibid*

⁴³ s.51 of Copyright Act, *ibid*

⁴⁴ 1st Schedule of the Copyright Act

⁴⁵ A.O Oyewunmi, Nigerian Law of Intellectual Property, University of Lagos Press 2015 p.337

⁴⁶ H.P. Faga and N. Ole, *Op. cit*

⁴⁷ By s. 6 of Digital Millennium Copyright Act 1998 of U.S.A., such language is entitled to copyright: H.P. Faga and N. Ole, *ibid*

⁴⁸ H.P. Faga and N. Ole, *Op. cit*

⁴⁹ Limits of copyright protection in contemporary Nigeria Reexamining the Relevance... electronic copy available at [https://ssrn.com/abstract=3653596\(1\)](https://ssrn.com/abstract=3653596(1))

⁵⁰ John. H. Ryder & Smith, "Public key Cryptograph Standards: R.S.A. Data Security", (Created July 3, 2002) [WWW document], available at: URL: <http://www.org/docs> (visited 2/4/2022)

television jingles, played and repeated severally in different stations as to get to the grass root.

Conclusion

“Modern nations now rely more on their intellectual property resources as the master key to the realization of their national desire” - Adebambo Adewopo^[51].

Consequently, it is very important that intellectual resources of Nigeria be protected to build our economy. Nigeria’s wealth is hinged largely on the creativity and innovations of the citizens which must of necessity be protected.

Copyright works in Nigeria are to a large extent regulated by the Copyright Act Cap C28 Laws of the Federation of Nigeria 2004. The advent and continuous development of digital technology has brought about lacuna in the existing law resulting to inadequate protection of digital works. The digital copyright works of interest are broadcast and computer software. The right holders in this works have the exclusive right to reproduce, perform, distribute, adapt, publish, communicate to the public and broadcast. Any person who does anything contrary to the above stated rights without the authority of the right holder is an infringement. These rights can be protected by new and comprehensive legislation and also domesticating the International Instruments that have robust provisions for the protection of digital innovations.

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⁵¹ *Op. cit.*