Global Initiative for Economic, Social & Cultural Rights

NIGERIA

MULTI-COUNTRY STUDY

REPORT

Prioritising People in Fiscal Policy

Transforming Tax Reforms into Better Public Services in Nigeria

Public Services

Acknowledgments

This report was written by Roselyne Onyango, Programme Officer - Africa at the Global Initiative for Economic, Social and Cultural Rights (GI-ESCR), and reviewed by Chinedu Bassey, Advocacy and Political Engagement Consultant – Nigeria and Camila Barretto Maia, Executive Director (GI-ESCR). It was designed by Emilia Guzmán (GI-ESCR).

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Acronyms

BHCPF: Basic Healthcare Provision Fund

GDP: Gross Domestic Product

ICESCR: International Covenant on Economic Social and Cultural Rights

IMF: International Monetary Fund

kWh: Kilowatt-hour

MNEs: Multinational enterprises

NELFUND: Nigerian Education Loan Fund

NHIA: INational Health Insurance Authority

RESET: Reforms for Economic Stabilisation to Enable Transformation

SAP: Structural Adjustment Programme

SEP: Significant Economic Presence

SSB: Sugar-Sweetened Beverage

TETFund: Tertiary Education Trust Fund

UBEC: Universal Basic Education Commission

VAT: Value Added tax

WHO: World Health Organisation

I. Introduction

Nigeria's four new tax laws took effect on 1 January 2026; at a moment the government itself has described as a generational opportunity to build the country's revenue base. The reform is credible: a progressive income-tax structure, a 15% minimum effective tax rate on large multinationals and a new strategy to tax the digital economy all point toward a different fiscal path than the one Nigeria has followed since its independence.

The stakes of getting implementation right are important. Nigeria's tax-to-GDP ratio remains among the lowest in the world on internationally comparable measures: 8.2% in 2023, below the African average of 16.1%.1 In his national address marking 65 years since independence, President Bola Ahmed Tinubu claimed that the country's tax-to-GDP had risen to 13.5%2 and expected to increase further once the new tax law takes effect.3 These numbers are still short of the 15% threshold that the International Monetary Fund (IMF) and World Bank research identify as critical for sustained growth.4 This growth- oriented minimum is not, on its own, sufficient. Under the International Covenant on Economic, Social and Cultural Rights (ICESCR), Nigeria is obligated to mobilise maximum available resources toward the progressive realisation of economic and social rights.5 This standard requires considerably more than a growth-optimal floor, particularly given the scale of Nigeria's own unmet commitments on public education, health, water and energy. Closing that gap through progressive taxation is not simply a matter of principle, but of adequacy. It is the difference between a revenue strategy that broadens the tax base sustainably and one that repeats a pattern Nigeria has now cycled four times since 1986.

This brief aims to set out the evidence for Nigeria's revenue and debt service problem, traces its cost to the financing of education, health, energy and water and closes with concrete recommendations for ensuring the 2026 tax reform delivers public services rather than repeating the pattern of the past.

II. Debt or Revenue Crisis? Interrogating Nigeria's Fiscal Numbers

Does Nigeria have a debt problem? The honest answer depends on which number you look at. By most conventional measures, Nigeria's debt-to-GDP ratio is not unusually high, certainly not by the standards of its regional peers. The IMF reported Kenya's debt-to-GDP at 69.3% and South Africa's at 78.6% in 2025, roughly double Nigeria's figure for the same year.6 Yet Nigeria has spent four decades cycling through episodes that look, feel and function like austerity: subsidy removal, currency devaluation and consumption tax increases, each justified in the language of fiscal necessity.

The International Monetary Fund's Fiscal Monitor puts the ratio of debt-to-GDP at 39.3% in 2024, declining to 35.5% in 2025 and projected to 32.3% in 2026.7 Nigeria's former Finance Minister (2023-2026), Wale Edun, cited a comparable figure of 36.1% in January 2026, describing it as among the lowest in Africa.8 These figures are proof that Nigeria's debt-to-GDP ratio is not the primary constraint on public finances. The more pressing figure is the debt service to revenue ratio, which measures the share of government income consumed by interest and principal payments rather than the size of the debt relative to the economy. On this measure, Nigeria's position is far more severe: the World Bank's Macro Poverty Outlook recorded a debt service to revenue ratio of 83.2% in 2021, rising to 96.3% in 2022, meaning almost all federal revenue that year went to serving debt.9 Furthermore, the IMF's representative for Nigeria, Christian Ebeke, confirmed in 2026 that Nigeria continues to spend 50% of its tax revenue on interest payments alone.10 It is this gap between comparatively low debt-to-GDP ratio and an extremely high debt service that describes Nigeria's problem as one of revenue, not indebtedness.

Research by the Civil Society Legislative Advocacy Centre (CISLAC) and Christian Aid Nigeria found that while multilateral and bilateral loans typically carry concessional interest rates of 1 to 3%, Nigeria's commercial creditors, overwhelmingly United States and European asset managers holding Eurobonds, charge between 6 and 9%.11 Thus, in 2021 alone, Nigeria paid approximately USD 823.2 million in interest to bondholders, more than four times the combined USD 196.4 million paid to multilateral and bilateral creditors that year, even though bondholders held a smaller share of the underlying debt stock. The same research also identified 224 individual private creditors, led by United States and European asset managers, holding Nigerian bonds and found that none of them agreed to participate in debt relief or suspension initiatives multilateral lenders extended to Nigeria during the COVID-19 pandemic.12 Furthermore, between 2017 and 2021, Nigeria spent NGN 4.68 trillion on education, just a quarter of the NGN 16.4 trillion spent on debt servicing over the same five years, evidence of the trade-off between debt service and public services.

As of 2026, domestic creditors hold 54.85% of public debt, roughly NGN 87 to 89 trillion, mostly in the form of Federal Government of Nigeria bonds and Treasury Bills held by local banks and investors.13 External creditors hold the remaining 45.15%, around USD 51.90 billion.14 Within that external debt, multilateral institutions are the largest single category at 45.96%, with the World Bank Group the largest individual lender through the International Development Association.15 Commercial creditors, overwhelmingly Eurobond holders, account for a further 35.73%.16 Bilateral government to government lending makes up just 12.69% of external debt, with China owed 10% of Nigeria's external debt.

III. The IMF, the World Bank and Nigeria's Fiscal Choices Since 2020

When oil prices collapsed in the early 1980s, Nigeria's government negotiated for an IMF loan, but a 1985 national public debate saw Nigerians overwhelmingly reject the Fund's conditions. The then president, General Babanginda, honoured that rejection and declined the loan, then implemented a nearly identical Structural Adjustment Programme (SAP) domestically in 1986 without drawing on IMF resources.18 The IMF's approval of that programme was nonetheless the precondition for Nigeria regaining access to international credit: the Paris Club rescheduled USD 7.5 billion of Nigerian debt in December 1986, and the London Club restructured a further USD 2.8 billion in commercial arrears.19

That aside, the IMF's role in the current period has been advisory rather than contractual. Nigeria's only instance of lending from the IMF since 2020 was a USD 3.4 billion Rapid Financing Instrument, disbursed in April 2020 to help the government respond to the economic shock of the COVID-19 pandemic and the collapse in oil prices that year.20 It carried no policy conditions by design and Nigeria has since repaid the loan's principal in full, though it continues to owe roughly USD 30 million a year in residual IMF charges.21 When Nigeria floated the Naira and removed the fuel subsidy in June 2023, the IMF publicly stated this was a domestic decision, not one it had directed.22

With regard to the World Bank, in June 2024, the institution approved a USD 2.25 billion financing package, the Reforms for Economic Stabilisation to Enable Transformation (RESET) budget-support loan (USD 1.5 billion) and the ARMOR revenue-mobilisation programme (USD 750 million) explicitly tied to "Nigeria's homegrown reforms."23 To unlock the RESET loan, Nigeria's government was contractually required to (and did) issue a Presidential Executive Order mandating that all federal fiscal transfers from crude oil sales and gasoline imports be conducted at the prevailing market exchange rate, this step formalised the removal of fuel subsidy; submit a bill to the National Assembly proposing a VAT rate increase; and submit an amendment bill mandating the National Social Registry as the primary targeting tool for social investment programmes, determining which households would receive compensatory support once subsidies were withdrawn.24 The World Bank's own tranche-completion review confirmed the government "moved ahead" of the agreed fuel-pricing timeline and "overachieved" that condition by fully deregulating petrol prices in October 2024, and recorded the submitted VAT bill as proposing an increase to 10% by 2025.25

Of the three conditions, only the fuel-pricing Executive Order was fully implemented.26 The VAT increase bill satisfied the World Bank's submission requirement but was subsequently rejected by the House of Representatives, which retained VAT at 7.5% in the final Nigeria Tax Act, 2025.27 The National Social Registry amendment bill's legislative status remains unclear after its first reading on November 19, 2024.

IV. Squeezed Out: How Low Revenue and High Debt Service Have Shaped Public Spending

The consequences of Nigeria's revenue and debt service problem, set out above, are not abstract. Every naira the government fails to collect and every naira it collects but sends straight to creditors, is a naira that never reaches a classroom, a clinic, a water point or a power line. This section traces those fiscal choices across education, health, energy and water.

a. Education

Nigeria is not under-spending on education because it cannot afford to finance the sector. Federal education allocations rose from NGN 2.18 trillion in 2024 to approximately NGN 3.52 trillion in 2025, a nominal increase of over 60%, and the 2026 proposal holds at roughly the same level, where the Federal Ministry of Education's own budget proposal, was set at NGN 3.52 trillion, against a total proposed federal budget of NGN 58.18 trillion.29 Despite this nominal growth, the sector's share of total federal expenditure has barely moved, hovering around 6-7.3% across this period, far below the 15-20% benchmark referenced internationally. Relative to GDP, education spending remains around 3%, below the Incheon Declaration benchmark of 4-6%.30

The contrast with debt servicing makes clear why this shortfall persists even as nominal allocations rise. In 2026, the federal government is expected to spend NGN 15.81 trillion on debt servicing alone, which is four times more than the entire education budget for that year.31

However, this is not only a question of how much is allocated. At the state level, the aggregate education budget rose from NGN 2.41 trillion in 2024 to approximately NGN 3.6 trillion in 2025, yet average execution rates remained stuck at 66 to 67%. In effect, roughly one-third of approved education spending routinely fails to materialise.32 At the federal level, the Ministry's own budget defence to the National Assembly revealed that its capital release rate collapsed from 32.4% in 2024 to just 5.8% in 2025, with only NGN 19.5 billion disbursed against NGN 335.2 billion appropriated.33

This underfunding has a direct workforce cost. UBEC's own 2025 National Personnel Audit recorded a sharp fall in the number of primary school teachers, from 1.47 million in 2022 to 915,593, with the Nigeria Union of Teachers reporting that over 30% of the teaching workforce left the profession in the three years following the COVID-19 pandemic.34 The result is a national teacher-pupil ratio of 1:35, well above the UNESCO benchmark of 1:25. UBEC itself puts the primary-level teacher deficit at over 165,000 and in some conflict affected states, the ratio is nearly double the national average.35

The human cost of this combination, whereby revenue is too scarce to meet international benchmarks, allocations frequently remaining undisbursed and a shrinking teacher workforce, is concerning. An estimated 18.3 million Nigerian children remain out-of-school, a figure that predates, but has not been reversed by the current reform period.

b. Health

Health financing has followed the same trajectory as education; nominal increases that never close the gap to Nigeria's obligations to finance public healthcare. Federal health allocations rose from NGN 547 billion in 2021 to NGN 826.9 billion in 2022, NGN 1.17 trillion in 2023, NGN 1.33 trillion in 2024 and NGN 2.48 trillion in both the 2025 and 2026 budgets.37 Yet health's share of total federal spending has stayed roughly flat, hovering between 4.2% and 6% across the entire period, never approaching the 15% benchmark Nigeria and other African Union states committed to under the 2001 Abuja Declaration.38

Within this total, the Basic Healthcare Provision Fund (BHCPF), Nigeria's main vehicle for funding basic care, has actually moved backward. Its budget more than doubled between 2024 and 2025, from NGN 125.74 billion to NGN 282.65 billion, but then fell to NGN 245.14 billion in 2026.39 The National Health Insurance Authority (NHIA), meanwhile, illustrates a different problem. It is responsible for channelling large sums to others but is not sufficiently funded to run itself. In 2026, the NHIA passed NGN 110.31 billion in BHCPF funds through to subsidise insurance premiums for vulnerable citizens, while its own operational budget, covering staff, offices and monitoring, was just NGN 920 million.40 As of July 2026, the NHIA covered roughly 22 million people, about 10% of the population, more than two decades after the scheme's 2005 launch. Coverage has grown 35% in the past year, but the government's own target of 44 million enrollees by 2030 would still leave half of Nigerians uninsured and the premium for informal-sector workers rose 76% over the same period, making it expensive for the poorest Nigerians to afford.41

Additionally, the gap between what is budgeted and what reaches the health system is even starker than the allocation numbers alone suggest, Budget Office data covering federal health capital releases from 2021 to 2025 show a pattern of chronic non-disbursement: of NGN 194 billion appropriated in 2021, a large share went unreleased; by 2023, only NGN 40.4 billion of NGN 134 billion appropriated (30%) was actually released; by 2024, only NGN 65.4 billion of NGN 434.8 billion (15%) reached the sector; and by 2025, of NGN 218 billion appropriated for health capital projects, only NGN 36 million, roughly 0.02% was released.42

The social cost of this sustained underfunding is direct and measurable. Nigeria continues to record one of the world's highest rates of health-worker emigration, the so-called 'japa syndrome', alongside poor health worker welfare and industrial action by doctors and nurses all cited by the Nigerian Medical Association and National Association of Resident Doctors as direct consequences of chronic underfunding.43 With the state failing to adequately fund the system, the cost of care falls onto patients directly with out-of-pocket payments covering 75% of health expenditure, among the highest share in globally.

c. Energy: Fuel and Electricity

The removal of the fuel subsidy and the naira float pushed petrol prices up almost fivefold by October 2024, while the April 2024 tariff order more than tripled electricity costs for Band A customers from NGN 66 to NGN 225 per kWh.45 Because more than 58% of Nigerian households remain off the national grid and depend on petrol or diesel generators, these two shocks compounded each other, driving up the cost of food and logistics.46

Federal capital investment in the power sector has not kept pace with this need: the sector received roughly NGN 337 billion in capital allocation in 2024, rising to a proposed NGN 1.096 trillion for 2026, but nominal increases mean little given Nigeria's chronic pattern of non-disbursement. The government's own 2026 budget speech admitted that only 17.7% of the entire 2025 federal capital budget had been released by the third quarter. In that same year the Ministry of Solid Minerals Development recorded zero capital disbursement despite NGN

865 billion being appropriated, showing that non-disbursement is not unique to the power sector.47

d. Water

Water has consistently received the smallest allocation among Nigeria's major infrastructure sectors, and its funding history shows the same pattern of modest nominal increases without closing the underlying access gap.

The Federal Ministry of Water Resources and Sanitation received NGN 242.2 billion in 2023 and NGN 296.64 billion in 2024, a 22.5% nominal increase, before falling sharply to a proposed NGN 98 billion for 2026.48 Even where allocations have risen, analysts note that 60-90% of water sector budgets over the past several years have gone to capital projects with no corresponding improvements in access. Nigeria has instead drifted from a public water supply model toward one more dominated by private and donor funded solutions.49

Of concern is that despite Nigeria's abundant water resources, only around two thirds of the population, out of more than 200 million people, have access to clean drinking water.50 The burden falls hardest on rural communities and on women and girls in particular. Globally, women and girls are responsible for water collection in 7 out of 10 households that lack water on premises, time that is taken directly from school, paid work, rest and care.51

V. Recommendations: The New Opportunity

Nigeria's four new tax reform laws; the Nigeria Tax Act, the Nigeria Tax Administration Act, the Nigeria Revenue Service (Establishment) Act and the Joint Revenue Board (Establishment) Act, in force since 1 January 2026, mark a real departure from the austerity script described earlier. They introduce a progressive income tax exempting earners from the national minimum wage and below (about NGN800,000 a year), reinforce Nigeria's power to tax foreign digital companies through the SEP concept, apply a 15% minimum effective tax rate to large multinationals, and earmark a 4% Development Levy for education financing, split between the Tertiary Education Trust Fund (TETFund) (50%) and the Nigerian Education Loan Fund (NELFUND) (15%). Properly implemented, this is the first credible route in decades to raise revenue progressively, from those most able to pay, rather than through subsidy removal and tariff hikes that fall hardest on the poor.

This is why we make the following recommendations to policymakers and institutions that deal with revenue collection, allocation and public spending. They are organised in two clusters: first, ensuring the new tax regime itself is transparent and effectively implemented and second, ensuring the revenue it raises reaches the public services Nigerians depend on.

a. On Transparency, Accountability and Implementation of the New Tax Regime

The new tax regime can only deliver if its implementation is open, evidence based and subject to public oversight. Nigeria's tax system has historically suffered from opacity, weak compliance and insufficient accountability. These recommendations are seeking to change that pattern as the implementation process is ongoing.

1. Make tax data public.

The government has projected trillions of naira of additional revenue. Establishing how those projections were reached, including whether they account for existing tax incentives and realistic compliance rates, is a precondition for meaningful oversight by citizens, civil society and the National Assembly.

To achieve this, the Nigerian Revenue Service, State Inland Revenue Services and Ministry of Finance need to publish clear, accessible and regularly updated reports on:

1) Projected revenue from the new tax acts.

2) Actual revenue collected quarterly.

3) Compliance rates by sector and taxpayer category.

4) Tax expenditure reports showing the value of all tax incentives and exemptions.

5) Cost-benefit analyses of major tax incentives.

2. Establish a resourced, independent and participatory monitoring and oversight system for tax reform implementation.

Passing legislation is the beginning of implementation, not its conclusion. Effective tax reform requires a permanent system of monitoring, evaluation and democratic oversight, with distinct and complementary responsibilities for the Executive, the Legislature and the Office of the Tax Ombud.

The Executive must monitor implementation, publish reliable information and create opportunities for public participation. Recent experiences, including stakeholder engagement through the VAT Modification Committee and the consultation around the Finance Bill 2027, provide useful models for institutionalising such participation.

The National Assembly and State Houses of Assembly must, in turn, independently oversee implementation by the Executive. The Office of the Tax Ombud should complement these mechanisms as an autonomous institution focused on taxpayer rights, including by identifying systemic implementation problems and ensuring accessible grievance mechanisms.

To achieve this:

1) The Ministry of Finance should establish a transparent, participatory and technically credible monitoring and evaluation

framework for tax reform implementation, with clear indicators, timelines, responsibilities and regular public reporting.

2) The Ministry of Finance should institutionalise direct public participation in tax policy implementation and review, building on experiences such as the VAT Modification Committee and the Finance Bill consultation, and ensuring meaningful engagement with civil society, labour organisations, taxpayer groups, experts and affected communities.

3) The Nigeria Revenue Service and other implementing institutions should be adequately resourced to ensure effective enforcement, reliable data collection and timely disclosure of the information required to assess implementation.

4) The National Assembly and State Houses of Assembly should exercise regular and independent oversight of tax reform implementation, including through committee hearings, reporting requirements and scrutiny of revenue collection, tax expenditures, implementation gaps and the social and distributional effects of the reform. These processes should provide opportunities for public participation and draw, where relevant, on findings from independent oversight institutions.

5) The Office of the Tax Ombud should have institutional autonomy and adequate financial, human and technical resources to protect taxpayer rights, identify systemic problems in the implementation of tax laws, publish regular taxpayer rights reports and maintain accessible and effective grievance mechanisms, particularly for vulnerable groups.

6) The Legislature, Executive and Tax Ombud should establish structured channels for institutional dialogue and information-sharing while preserving their distinct mandates and independence, including mechanisms that allow the Legislature to use Ombud findings as evidence in exercising its own oversight of the Executive.

3. Ensure multinational enterprises, including digital companies, pay their fair share of tax.

Multinational enterprises (MNEs), including companies providing digital services, must contribute a fair share of tax in Nigeria. This is particularly important as the Nigerian economy becomes increasingly digitised and businesses can generate substantial revenues in the country without maintaining a traditional physical presence.

The new tax laws take important steps in this direction. They introduce the concept of Significant Economic Presence (SEP) for digital activities and establish a 15% effective tax rate for multinational enterprises operating in Nigeria. Effective implementation of these measures will require strong domestic tax administration, greater transparency and continued engagement with international tax cooperation processes, including the ongoing negotiations towards a United Nations Framework Convention on International Tax Cooperation (UNFCITC) and its protocols, which are expected to address issues including the taxation of cross-border services in an increasingly digitalised economy.

Nigeria must also strengthen its capacity to identify and address tax avoidance and illicit financial flows associated with multinational activities. This includes effective exchange of tax information with other jurisdictions, as well as the technical capacity to detect transfer mispricing, trade mis-invoicing and other forms of base erosion and profit shifting.

To achieve this, the Nigeria Revenue Service and Ministry of Finance should:

1) Publish a clear and practical implementation and enforcement plan for the taxation of multinational enterprises, including companies providing digital services and those subject to Significant Economic Presence rules.
2) Ensure that Nigeria’s tax framework remains consistent with relevant international standards and emerging legal developments, while safeguarding Nigeria’s taxing rights and policy space.
3) Invest in domestic technical and institutional capacity to detect and challenge transfer mispricing, trade mis-invoicing, base erosion and profit shifting, and other illicit financial flows, rather than relying solely on international frameworks.
4) Strengthen mechanisms for effective exchange of tax information with jurisdictions in which multinational enterprises operating in Nigeria conduct business or report profits.
5) Publish annual, disaggregated data on tax revenues collected from multinational enterprises, including revenues attributable to digital economy operators and the application of the 15% effective minimum tax.

6) Institutionalise regular and transparent reporting of tax expenditures, including incentives and exemptions granted to multinational enterprises.

b. On Increased and Better Funding of Public Services

Additional revenue only matters if it reaches the public services, including education, health, energy and water, that determine whether ordinary Nigerians have a decent life. Nigeria's budget has historically underfunded these public services and the recommendations below set out what it would take to change that.

1. Ring-fence new tax revenue for social spending:

Nigeria's 2026 budget has grown to NGN 68.30 trillion, but remains heavily burdened by debt service, which alone accounts for NGN 15.81 trillion, or roughly 23% of total spending (as projected in the 2026) budget.52 If the new tax revenue is also absorbed by existing debt obligations rather than directed toward social spending, the reform will not translate into improved public services.

To achieve this, the Ministry of Finance, Ministry of Budget and Economic Planning, Senate and House of Representative Appropriations Committee should:

1) Publish a clear plan showing how additional tax revenue from the new laws will be ring-fenced or earmarked to increase and sustain spending on education, health, energy, and water and report on this allocation annually.

2) Require that any budgetary decision to prioritise debt servicing over spending on education, health, water and energy be preceded by a published human rights impact assessment. The assessment must show the decision is temporary, necessary and proportionate, applied without discrimination, protective of the minimum core content of economic and social rights and reached through a transparent and participatory process.53

2. Commit to reaching international benchmarks for education spending.

As shown above, Nigeria spends just 3% of government expenditure and 0.3% of GDP on education. This is far below the international standard of

15-20% of expenditure and 4–6% of GDP, with an estimated 18.3 million Nigerian children54 still out of school.

Two legal changes now offer a real chance to close this gap. First, the Nigeria Tax Act, 2025 introduces a 4% Development Levy on assessable company profits.55 Half of this is earmarked for the Tertiary Education Trust Fund (TETFund) and 15% to the Nigerian Education Loan Fund (NELFUND).56

Second, an amendment to the Universal Basic Education Act that will also affect financing of education has already passed both chambers of the National Assembly.57 If assented, this will see the Universal Basic Education Commission (UBEC) statutory share of the Consolidated Revenue Fund increase from 2% to between 4% and 5%,58 the largest funding increase for basic education in two decades.59

However, neither law guarantees results on its own; they must be paired with transparent tracking and enforced disbursement.

To achieve this, the Ministry of Education, Ministry of Finance, Senate and House Committee on Education, Ministry of Budget and National Planning:

1) Commit publicly and in writing to a credible, time-bound plan to increase total education spending to at least 4-6% of GDP and 15-20% of government expenditure at both the federal and state levels.

2) Publish regular, transparent reports on the TETFund's and the NELFUND's receipt and utilisation of its 50% and 15% share of the Development Levy, respectively.

3) Push for the conference committee of the legislature to adopt the higher 5% figure and for prompt presidential assent once the bill is reconciled before the tabling of the 2027 budget.

4) Ensure increased funding reaches the UBEC for accessible, quality basic education for all Nigerian children, with special attention to girls and children in marginalised communities.

3. Commit to reaching international benchmarks for health spending.

Nigeria spends below the WHO-recommended minimum of 5–6% of GDP and the Abuja Declaration commitment of spending 15% of its budget on health.60 This is evident in the 2026 budget, whereby despite a record nominal allocation, the budget allocation amounted to only 5.2% of total federal spending.61

However, the issue is not only about how much is allocated, but where the money goes once allocated, the BHCPF funding fell in 2026 even as the overall budget grew, and NHIA's own operation budget is a fraction of the funds it is responsible for distributing.62 The result is a health insurance system that, after fifteen years, still covers fewer than 5% of Nigerians63, while 76.13% of health expenditure is paid out-of-pocket by individuals, the highest proportion in Africa.

There is a live opportunity to change this. In 2026, the Senate passed two bills that would strengthen health financing, both of which now await the action in the House of Representatives before they can proceed to presidential assent. The first raises BHCPF's statutory share of the Consolidated Revenue Fund from 1% to 2%, doubling its legal funding floor.64 The second amends the Customs, Excise Tariff, etc. (Consolidation) Act to replace the current NGN 10-per-litre excise duty on sugar-sweetened beverages (SSBs) with a percentage-based levy linked to retail price. 65 Independent analysis on the bill has however raised concern about this design. This is because the levy rises and falls with a drink's price rather than its sugar content, it gives the manufacturer no reason to reduce sugar content and because an estimated 75% of sales in the retail sector fall outside the enforcement, the tax risks pushing lower income consumers toward unregulated alternatives instead.66The Bill's proponents have recommended that part of the revenue be earmarked for health promotion, disease prevention, primary healthcare and health insurance for poor and vulnerable Nigerians.67 However thus earmarking is not yet guaranteed in law and its implementation once enacted, will need to be transparently tracked.

To achieve this, the Ministry of Health, Ministry of Finance, National Health Insurance Authority, Senate and House Committees on Health, Ministry of Budget and National Planning should:

1) Commit to a time-bound plan to reach at least 5-6% of GDP and 15% of federal and state expenditure on health, in line with the Abuja Declaration commitment.

2) Push for the House of Representatives to pass the BHCPF amendment bill without delay, and prompt presidential assent once passed.

3) Publish quarterly data on BHCPF releases against appropriation, broken down by gateway agency, so it is possible to check whether the doubled funding floor actually reaches facilities once the bill becomes law.

4) Develop and implement new institutional incentives to enhance subnational states counterpart funding for BHCPF, since disbursement has historically stalled where states fail to match federal contributions.

5) Require NHIA to publish an annual enrolment report disaggregated by state, income group and formal/informal sector status, with a public, time-bound target for increasing coverage, including specific mechanisms for enrolling informal-sector workers who cannot pay standard premium.

6) Redesign the SSB levy as a tiered, sugar-content-based tax rather than a price-based one, following the approach used in the United Kingdom and South Africa, so manufacturers have a genuine financial incentive to reduce sugar content rather than simply passing the cost on to consumers.

7) Legislate the revenue-earmarking provision directly into the SSB Bill, rather than leaving it as a recommendation, and publish annual reporting on how much revenue is collected and where it is spent, to guard against the levy becoming regressive by taxing the low-income Nigerians without funding the health services it is meant to support.

8) Develop a concrete workplan for addressing the public health workforce crisis, including by investing in competitive remuneration, working conditions and retention incentives for health workers.

4. Increase and actually disburse energy and water allocations.

Reliable energy and clean water are foundations to education, maternal health and household welfare, yet both sectors remain chronically underfunded. About 40% of Nigerians still lack access to electricity and only 67% have access to basic drinking water supply services, a figure that has declined in recent years. These gaps fall hardest on rural communities and poorer households.

To achieve this, the Ministry of Power, Ministry of Water Resources and Sanitation, Ministry of Finance, Senate and House Committee on Energy and Water and Ministry of Budget and National Planning should:

1) Increase budget allocations to the energy and water sectors.

2) Publish clear targets and timelines for expanding access.

3) Implement reforms to ensure that allocated funds are actually disbursed and spent effectively at the community level.

4) Publish regular progress reports on the proportion of Nigerians with access to reliable electricity and safe water, disaggregated by rural and urban areas.

5. Establish a transparent, citizen-facing accountability framework for public spending.

Additional revenue and spending will only deliver results if funds reach their intended destination and citizens can verify that they have these services. Nigeria has a well-documented problem of funds leaking between allocation and delivery and at federal, state, and local levels.

To achieve this, the federal and state governments should establish and publish a comprehensive accountability framework that includes:

1) Clear and accessible public reporting on revenue collected and how it is spent, in plain language that ordinary Nigerians can understand.

2) Independent audit mechanisms with real enforcement powers and transparent consequences for misappropriation and underperformance.

3) Create meaningful, structured channels for civil society organisations and citizens to participate in budget oversight and monitor service delivery.

4) A shift in the Office of the Tax Ombud's approach, from reactive crisis management to a proactive system that protects trust through the Grievance Redress Mechanism.

Endnotes

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Contact Us:

info@gi-escr.org

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