

THE LEGAL REFORM PATHWAY: TOWARDS A NIGERIAN PETROLEUM STANDARDS ACCREDITATION FRAMEWORK

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Abstract

Dense regulation and weak standardization have coexisted in Nigeria's oil and gas sector for long enough that the contradiction has stopped surprising people. The Petroleum Industry Act 2021 gave us the Nigerian Upstream Petroleum Regulatory Commission (NUPRC) and the Nigerian Midstream and Downstream Petroleum Regulatory Authority (NMDPRA). The Nigerian Oil and Gas Industry Content Development Act 2010 (NOGICD Act) gave us the Nigerian Content Development and Monitoring Board (NCDMB). The Standards Organisation of Nigeria (SON) governs national standards. The framework is, on paper, substantial. Yet every practitioner who has advised an operator in this sector, and every international investor who has financed one, knows what none of these institutions will say out loud: International Organisation for Standardisation (ISO) management system standards are demanded across the industry every day and are invisible in every piece of Nigerian petroleum regulation. This paper names that condition the compliance phantom — a standard that exists in practice but not in law — and its direct consequence, the compliance conundrum: where demonstrated compliance earns no regulatory reward, and its absence attracts no regulatory penalty. The

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infrastructure to close this gap already exists — in the Nigeria National Accreditation System (NiNAS), SON, NCDMB, NMDPRA, NUPRC, and the Nigeria Liquefied Natural Gas Limited (NLNG). Nigeria does not need new institutions, new legislation, or foreign models. It needs the regulatory will to connect what it already has, and a Nigerian Petroleum Standards Accreditation Framework (NPSAF) to give that will, legal form. The reform pathway this paper proposes does not wait on the National Assembly. Each tier can be implemented through powers the relevant institutions already hold.

Keywords: *Compliance Phantom, Compliance Conundrum, ISO Certification, Petroleum Regulatory Compliance, NPSAF*

1. Introduction

Nigeria's oil and gas sector is not short of regulation. The Petroleum Industry Act 2021 (PIA) created NUPRC to govern upstream operations and NMDPRA to govern midstream and downstream activities.³ The NOGICD Act 2010 superimposed local content obligations administered by NCDMB.⁴ Every licence, every permit, every approved work programme carries a long list of compliance conditions behind it. The architecture is dense enough. What it lacks is not breadth. It is accuracy.

That blind spot has a name: ISO management system standards. Ask any lawyer advising a multinational operating in Nigeria's petroleum sector whether their client needs ISO certification. The answer is yes — because Shell, TotalEnergies, and their financiers require it. Ask NUPRC or NMDPRA whether ISO certification counts as compliance evidence. The answer, currently, is silence.

³ Petroleum Industry Act 2021 (Nigeria), ss 6–10 (NUPRC) and ss 29–33 (NMDPRA).

⁴ Nigerian Oil and Gas Industry Content Development Act 2010 (NOGICD Act), s 1; s 71 (establishing NCDMB).

That silence — between what the industry demands and what the regulatory system acknowledges — is what this paper is calling the compliance phantom. It is a standard that exists in practice but not in law. The compliance phantom produces something equally damaging in practice: the compliance conundrum, where a company that has spent real money obtaining internationally accredited certification presents itself before Nigeria’s regulators and stands in the same position as a company that spent nothing. Compliance is unrewarded. Non-compliance is unpenalized. No regulatory system worth the name works that way.

The infrastructure needed to close this gap is not missing. NiNAS has accredited four indigenous management system certification bodies, three of which operate in the oil and gas sector: Systems Certifications Limited and Interconformity Assessment & Certification Limited, both in Port Harcourt, and COREquality CB Limited in Lagos, each authorised to certify organisations to ISO 9001 (Quality Management Systems), ISO 14001 (Environmental Management Systems), ISO 27001 (Information Security Management Systems), and ISO 45001 (Occupational Health and Safety). SON has already adopted international petroleum standards into Nigeria’s national standards catalogue. NLNG already runs its supply chain like a company that has internalized ISO 45001 — without calling it that. NMDPRA is at this very moment harmonizing its regulations. The question Nigeria’s regulators now face is whether they will use what they already have.

This paper makes that case. It examines the regulatory architecture that should already be doing this work, considers which ISO standards bear most directly on petroleum sector operations, assesses what each institution is currently doing and what it is leaving undone, draws on how comparable jurisdictions have handled the same question, and sets out the reform pathway that leads to the NPSAF.

2. Nigeria's Petroleum Regulatory Architecture: A Framework with Missing Links

The PIA 2021 was a generational reform. NUPRC now controls upstream licensing, technical standards, and environmental compliance. NMDPRA holds equivalent authority over midstream and downstream — including express statutory power under section 107 of the PIA to set and enforce technical and safety standards for petroleum installations and facilities.⁵ SON, established under the SON Act 2015, is the apex body for national standards across all industries.⁶ NiNAS is Nigeria's sole national accreditation body, responsible for accrediting the organisations that certify other organisations — the certifiers of certifiers.⁷

Those four mandates, taken together, describe an institutional architecture capable of building a petroleum compliance ecosystem that would be recognized anywhere in the world: NUPRC sets compliance conditions; NMDPRA sets safety and technical standards; SON recognizes national standards; NiNAS accredits the bodies that independently verify compliance with those standards. The pieces are all present. The question is why they have not been assembled.

Because none of these institutions has connected its mandate to ISO management system standards in any legally binding way. NUPRC's licensing conditions do not recognize ISO certification as compliance evidence. NMDPRA's regulatory framework does not formally acknowledge ISO 45001 — even though it is already being demanded of operators by their international partners. SON has not extended its standards recognition function to ISO management systems for the petroleum sector. NiNAS has accredited three

⁵ Petroleum Industry Act 2021, s 53(1)(e) (NUPRC licensing conditions); s 107 (NMDPRA power to set technical and safety standards).

⁶ Standards Organization of Nigeria Act No 14, 2015, s 5.

⁷ Nigeria National Accreditation System (NiNAS), 'About NiNAS' <<https://ninas.org.ng>> accessed 20 February 2026.

indigenous management system certification bodies — two in Port Harcourt and one in Lagos — to do exactly this work, and NUPRC, NMDPRA, and NCDMB have not noticed. This is the compliance phantom — and it is the central failure this paper addresses.

3. The ISO Standards Relevant to Nigeria's Oil and Gas Sector

The ISO standards relevant to Nigeria's petroleum sector fall into four distinct operational areas, each of which corresponds to a documented pattern of failure in how the sector has historically been managed. Understanding which standard addresses which failure is the first step toward understanding why their absence from Nigerian regulatory frameworks, is not a technical oversight, but a governance problem.

Quality and sector-specific compliance is where ISO 29001:2020 operates, the only ISO standard written specifically for the petroleum, petrochemical, and natural gas industries, designed as a sector supplement to ISO 9001:2015.⁸ These two standards together address supply chain risk, process consistency, and quality assurance — areas where the Nigerian petroleum supply chain has been weakest, as evidenced by decades of contractor failures, substandard equipment, and deferred maintenance.

Environmental and energy governance is where the case for ISO integration is hardest to dismiss in Nigeria. ISO 14001:2015 for environmental management and ISO 50001:2018 for energy management are the relevant standards here.⁹ ISO 14001, carries particular weight in the Niger Delta context. Decades of oil spills, gas flaring, and environmental degradation have occurred against a backdrop of regulatory action that has been reactive rather than

⁸ ISO, 'ISO 29001:2020 Petroleum, Petrochemical and Natural Gas Industries — Sector-Specific Quality Management Systems' (ISO, 2020); ISO, 'ISO 9001:2015 Quality Management Systems — Requirements' (ISO, 2015).

⁹ ISO, 'ISO 14001:2015 Environmental Management Systems' (ISO, 2015); ISO, 'ISO 50001:2018 Energy Management Systems' (ISO, 2018).

systemic. An ISO 14001-certified operator does not wait for a spill before managing environmental risk — it builds the management system that prevents the spill. ISO 50001 connects directly to Nigeria’s gas monetization agenda and its Paris Agreement commitments.

Safety and asset integrity is where the argument becomes most concrete. ISO 45001:2018 on occupational health and safety, ISO 20815:2018 on production assurance and reliability management, and ISO 55001:2024 on asset management, collectively address the conditions that define Nigeria’s most persistent operational failures. Nigeria’s pipeline infrastructure crisis is, at its core, an asset management failure. ISO 55001 provides the management system framework that prevents that failure from becoming the default condition of the industry.

Governance, security, and anti-corruption is the area this field has been slowest to address. ISO 37001:2016 on anti-bribery management systems, ISO 27001:2022 on information security, and ISO 28000:2022 on supply chain security management¹⁰ rarely appear in the literature on this sector. They should. Nigeria’s petroleum sector has been documented as one of the most corruption-affected in the world. A legally mandated ISO 37001 certification requirement for operators and contractors would represent a jurisprudential intervention of a kind that criminal enforcement alone has failed to deliver. That is worth saying plainly.

4. NMDPRA: The Strongest Powers, Still Unused

Of the institutions examined in this paper, NMDPRA has the strongest statutory basis for immediate action — and has come closest to taking it, without actually doing so.

¹⁰ ISO, ‘ISO 37001:2016 Anti-Bribery Management Systems’ (ISO, 2016); ISO, ‘ISO 27001:2022 Information Security Management Systems’ (ISO, 2022); ISO, ‘ISO 28000:2022 Security and Resilience — Security Management Systems’ (ISO, 2022).

Start with the statutory power. Section 107 of the PIA 2021 grants NMDPRA explicit authority to prescribe technical regulations governing the design, construction, operation, and maintenance of petroleum installations and facilities.¹¹ That is not a general enabling clause. ISO 45001, ISO 14001, ISO 29001, and ISO 55001 are technical management system standards for exactly these activities. NMDPRA does not need new legislation to embed them in its regulatory framework. It needs a regulatory decision.

The timing matters. NMDPRA is currently consolidating its regulations into proposed 2025 Midstream and Downstream Petroleum Safety and Environmental Regulations, expressly aimed at eliminating inconsistencies and deepening PIA compliance. That window will not stay open indefinitely. Every week that passes without ISO standards being embedded in that harmonisation exercise is a week in which an opportunity is being wasted. NMDPRA has already convened forums specifically themed around advancing a collaborative compliance culture in Nigeria's midstream and downstream sectors.¹² ISO management system standards are, by their very design, frameworks for collaborative and continual compliance improvement. NMDPRA has said in public what it wants to achieve. ISO management system standards provide the operational framework for achieving it. The distance between that stated aspiration and a functional compliance culture is, at this point, an administrative one — a matter of instrument-drafting, not of institutional redesign.

¹¹ NMDPRA, 'Proposed 2025 Midstream and Downstream Petroleum Safety and Environmental Regulations — Consultation Draft' (NMDPRA, 2024); Petroleum Industry Act 2021, s 107.

¹² NMDPRA, 'General Counsel and Legal Advisers Forum: Advancing a Collaborative Compliance Culture in Nigeria's Midstream and Downstream Petroleum Sectors' (NMDPRA, 2024).

5. NUPRC: Closing the Upstream Gap

The upstream picture is where the compliance conundrum is most visible. A company obtains ISO certification at considerable expense because its international partners require it. It presents itself before NUPRC. NUPRC does not recognise it. The certified company and the uncertified company are, before the regulator, identical. That is not a regulatory policy. It is a regulatory failure.

NUPRC already has the power to act. It should issue a Guidance Note — under its existing PIA powers — formally recognising ISO 29001 and ISO 45001 certifications issued by NiNAS-accredited bodies as third-party compliance evidence in upstream licence renewal assessments. No amendment to the PIA is required. No National Assembly approval is needed. The synergy between NUPRC and NMDPRA reforms is essential: a standard that applies upstream but not midstream and downstream is not a sector standard — it is a sectoral inconsistency. The two regulators must move together.

6. NCDMB: The Local Content Platform for ISO Integration

NCDMB administers the Nigerian Oil and Gas Industry Content Joint Qualification System (NOGIC JQS) — the electronic platform through which companies qualify to participate in Nigerian oil and gas contracts.¹³ It is, in practical terms, the sector's compliance gateway. NCDMB's own strategic framework is built on three pillars: Competence, Capacity Utilization, and Collaboration.¹⁴ The alignment with ISO standards is direct. ISO 9001 and ISO 29001 serve the Competence pillar. ISO 55001 and ISO 50001 serve Capacity Utilization. ISO 37001 and ISO 28000 serve Collaboration — particularly in relation to supply chain integrity, an area where the local content regime has faced persistent criticism.

¹³ NCDMB, 'NOGIC JQS — Joint Qualification System' <<https://ncdmb.gov.ng>> accessed 20 February 2026.

¹⁴ NCDMB, '10-Year Strategic Plan' (NCDMB, 2017).

The proposal is that NCDMB embed ISO certification — verified through NiNAS-accredited bodies — as a weighted criterion in the NOGIC JQS qualification and scoring system.¹⁵ An ISO-certified company, certified by a NiNAS-accredited Nigerian body, should receive a Nigerian Content score uplift. This drives demand for ISO certification across the sector while channelling that demand toward Nigerian certification bodies rather than the foreign accreditation bodies that Nigerian companies have historically been compelled to use at considerable cost.

7. SON and NiNAS: The Infrastructure Already Built

Before the argument, there is a fact. And it is one that Nigeria's petroleum regulators have not yet had to answer for.

NiNAS has already issued accreditation certificates in the field of management system certification to companies based in Port Harcourt and Lagos.¹⁶ These companies are authorised to certify organisations to ISO 9001, ISO 14001, ISO 27001, and ISO 45001. Port Harcourt — Nigeria's oil and gas capital — already has NiNAS-accredited certification bodies capable of certifying petroleum operators and service companies to the ISO management system standards that matter most in this sector. NiNAS holds Full Membership of the African Accreditation Cooperation (AFRAC) and Associate Membership of the International Laboratory Accreditation Cooperation (ILAC) and the International

¹⁵ NOGICD Act 2010, s 71; NCDMB, 'Projects Certification and Authorization Directorate' <<https://ncdmb.gov.ng/pcad>> accessed 20 February 2026.

¹⁶ NiNAS, 'Accredited Management System Certification Bodies' <<https://ninas.ng/accreditation/accredited-management-system-bodies/>> accessed 13 March 2026. The three NiNAS-accredited management system certification bodies relevant to the petroleum sector are: Systems Certifications Limited, Port Harcourt (MSC0001, ISO 9001, ISO 14001, ISO 45001); Interconformity Assessment & Certification Limited, Port Harcourt (MSC0002, ISO 9001, ISO 14001, ISO 27001, ISO 45001); and COREquality CB Limited, Lagos (MSC0004, ISO 9001, ISO 14001, ISO 27001, ISO 45001).

Accreditation Forum (IAF)¹⁷. Certifications issued by NiNAS-accredited bodies are increasingly accepted internationally under those mutual recognition arrangements.

The question this raises is simple: does NUPRC know? Does NMDPRA? Does NCDMB? Because nothing in any of their published guidelines, frameworks, or licensing conditions suggests that they do.

SON's position is equally clear. It has already adopted ten American Petroleum Institute (API) standards as Nigerian Industrial Standards for the oil and gas sector.¹⁸ The Director-General's own justification for that decision was that the adopted standards carry internationally recognized third-party accreditation that facilitates acceptance by international bodies. That is the precise argument this paper makes for ISO management system standards. SON has already accepted the principle. The Standards Council holds the statutory power to formally recognize NiNAS-accredited certification bodies as approved conformity assessment bodies for the petroleum sector.¹⁹ What remains is the exercise of that power.

8. NLNG: The Private Sector Proof of Concept

NLNG's 'Goal Zero' philosophy — zero fatalities, zero environmental incidents, zero process safety events²⁰ — describes exactly what ISO 45001 and ISO 14001 require of a certified organisation. NLNG's vendor and contractor pre-qualification process requires Health, Safety and Environment (HSE)

¹⁷ NiNAS, 'International Affiliations — AFRAC, ILAC and IAF Memberships' <<https://ninas.org.ng/affiliations>> accessed 20 February 2026.

¹⁸ SON, 'SON Adopts Ten API Standards as Nigerian Industrial Standards for the Oil and Gas Sector' (SON Press Statement, 2019).

¹⁹ SON Act No 14, 2015, s 19 (Standards Council power to authorize recognition of certification and inspection bodies).

²⁰ NLNG, 'Health, Safety and Environment Policy' <<https://nlng.com>> accessed 20 February 2026; NLNG, 'Vendor/Contractor Prequalification Requirements' (NLNG, 2023).

management system compliance as a condition of participation, not a preference. Companies that cannot demonstrate a documented, functioning HSE management system do not qualify.

This is the closest Nigeria currently has to a standards-based compliance gateway in the petroleum sector. And it is entirely informal. It is not codified in any regulation. It is not recognized by any regulator. It is not replicated — consistently or at all — across the wider industry. NLNG has been quietly demonstrating, for years, that standards-based compliance gatekeeping works in the Nigerian context. Nobody has written a law about it.

NLNG's Train 7 expansion is a live opportunity. The largest single investment in Nigeria's gas sector in decades is about to set supply chain governance standards that will shape the sector for a generation. The paper's case to NLNG is simple: formally embed ISO certification requirements — verified through NiNAS-accredited bodies — as a mandatory condition of Train 7 supply chain participation. When NLNG does that formally, the industry follows. It always does.

9. Comparative Analysis: What Other Jurisdictions Have Done

In the jurisdictions Nigeria most frequently cites as benchmarks, integrating ISO standards into petroleum regulatory frameworks is not a proposal under consideration. It has been done.

The UK's Health and Safety Executive formally recognize ISO 45001 within safety case regimes for offshore petroleum operations.²¹ Operators may satisfy safety case requirements through ISO 45001-certified management systems. The regulatory burden of duplicative inspections is reduced. Safety outcomes have improved. The UK experience shows that recognising ISO certification as compliance evidence does not lower regulatory standards — it raises them, by building continuous third-party

²¹ UK Health and Safety Executive, 'Safety Case Regulations 2015 and the Recognition of ISO 45001 in Offshore Safety Cases' (HSE, 2019).

verification into the compliance framework rather than relying on periodic inspection alone.

Norway's Petroleum Safety Authority goes further. Its Management Regulations require operators to maintain management systems that satisfy internationally recognized standards, with ISO certifications serving as primary compliance evidence.²² Norway has one of the best offshore safety records in the industry's history. That record was built, not inherited.

In the Gulf states, ISO certification is a licensing prerequisite. Saudi Aramco and the Abu Dhabi National Oil Company (ADNOC) require ISO 9001, ISO 14001, and ISO 45001 as baseline contractor qualification conditions.²³ Here is the asymmetry that Nigeria's regulators should reckon with: Nigerian companies are already obtaining these certifications to win contracts in Abu Dhabi and Riyadh. When they return to Nigeria, those certifications carry zero formal regulatory recognition. A Nigerian company is more credible in Saudi Arabia with its ISO certification than it is before NUPRC. That asymmetry is both legally anomalous and commercially damaging. It is also, in a word, absurd.

10. The Legal Reform Pathway: Towards a Nigerian Petroleum Standards Accreditation Framework

The reform proposed in this paper is structured in three tiers because the institutions involved have different powers, different reform windows, and different political constraints. Not everything requires legislation. Not everything requires the same urgency. But all of it is achievable.

²² Petroleum Safety Authority Norway, 'Management Regulations: Requirements for Management Systems and Technical and Operational Standards' (PSA, 2020).

²³ Saudi Aramco and Abu Dhabi National Energy Company (TAQA) Contractor Qualification Requirements (requiring ISO 9001, ISO 14001, and ISO 45001 as licensing prerequisites).

First Tier — Administrative Action, Requiring no Legislation:

NUPRC and NMDPRA issue formal instruments recognising NiNAS-accredited ISO certifications as third-party compliance evidence in licence renewals and operational permit assessments. The SON Standards Council exercises its existing power under the SON Act to formally recognize NiNAS-accredited certification bodies as approved conformity assessment bodies for the petroleum sector. None of this requires the National Assembly. These are administrative decisions, and they are overdue.

Second Tier — Regulatory Instruments:

NCDMB amends the NOGIC JQS criteria to embed ISO certification as a weighted score. NMDPRA embeds ISO 45001, ISO 14001, ISO 29001, and ISO 55001 as recognized compliance indicators in its 2025 harmonized regulations. NUPRC issues a Guidance Note making ISO certification a recognized upstream compliance indicator. Every one of these steps falls within existing secondary legislation powers. Primary legislation is not required.

Third Tier — Legislative Reform:

The NOGICD Act 2010 is amended to embed ISO accreditation as a statutory Nigerian Content compliance criterion. Regulations under the PIA 2021 establish the Nigerian Petroleum Standards Accreditation Framework (NPSAF) as a formal multi-agency coordination instrument co-administered by NUPRC, NMDPRA, NCDMB, SON, and NiNAS.²⁴ The NPSAF provides a unified accreditation gateway, incentive structures including expedited licensing and Nigerian Content score uplifts for ISO-certified companies, and a permanent institutional mechanism for keeping Nigeria's petroleum compliance standards aligned with international best practice.

²⁴ The proposed NPSAF would be co-administered by NUPRC, NMDPRA, NCDMB, SON, and NiNAS as a unified multi-agency accreditation gateway for the petroleum sector.

The NPSAF cannot function without an enforcement dimension — which is precisely what the existing regulatory architecture lacks. ISO-certified companies should receive measurable regulatory benefits — expedited permit processing, reduced inspection frequency, and score uplifts in the NOGIC JQS. Companies operating in sectors where ISO certification has been embedded as a compliance indicator should face specific regulatory consequences — including enhanced scrutiny and deferred license renewals — for failing to achieve or maintain certification. A framework without enforcement incentives risks becoming precisely the kind of regulatory architecture this paper critiques: formally present and practically ignored — which is the problem this paper set out to address.

11. Conclusion

Strip this paper back to its simplest claim: the gap it documents is not a resource problem, a capacity problem, or a legal problem. NiNAS is accrediting certification bodies in Port Harcourt and Lagos. SON has already brought international petroleum standards into the national standards catalogue. NLNG has been operating a standards-based compliance gateway in its supply chain for years. NMDPRA is rewriting its regulations at this moment. The problem is that none of these facts has been connected to any of the others in any legally binding way, by any institution with the power to do it.

Making that connection requires a specific regulatory decision — to formally recognised ISO management system certifications issued by NiNAS-accredited bodies as compliance evidence in petroleum sector licensing and qualification processes. That decision does not require new legislation. It does not require a constitutional amendment. It requires NUPRC, NMDPRA, and NCDMB to act on the powers they already hold.

Until that decision is made, the compliance conundrum persists. Nigerian companies will continue spending considerable sums obtaining ISO certifications because their international partners and

financiers require it. Those certifications will return to Nigeria and collect dust — unrecognized by the very regulators who should be rewarding the compliance they represent. The company that invested will be indistinguishable from the company that did not. The regulatory system will continue extracting nothing from the compliance value that international contract requirements are already generating across the sector. And operators without certifications will face no formal disadvantage — perpetuating the uneven enforcement that has long characterized this sector's regulatory culture. The conundrum is self-inflicted. It is also, entirely, correctable.

NUPRC and NMDPRA should exercise the powers they already hold without waiting for legislation. NCDMB should embed ISO certification in the NOGIC JQS framework. SON has started a journey with the API standards adoption — it should finish it. NiNAS needs to make itself visible to the regulators whose licensing and qualification work its accreditation infrastructure directly serves. And NLNG should formalise what it already does informally: a sector that has been watching it run a standards-based compliance gateway for years deserves to see that practice written into a contractual and regulatory framework.

Beyond permits and penalties is a regulatory system in which compliance is verified, rewarded, and internationally recognised — a system that Nigeria has the institutions, the infrastructure, and the statutory powers to build. The compliance phantom can be given legal form. The compliance conundrum has a solution. Whether Nigeria's regulators choose to act on that solution is, at this point. What separates those two things, at this point, is a set of decisions entirely within their power to make.