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THE LEGAL AND REGULATORY FRAMEWORK FOR MINING IN NIGERIA¹

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I. Introduction

Following the trend in several African countries, the Federal Government adopted a confiscatory policy of state control over natural resource endowments in the 1970s. The result was the mass withdrawal of financial and technical participation by transnational mining companies (TMCs) from Nigeria and the other countries that adopted a similar policy to safer havens³ and the virtual collapse of the mining sector. What has since followed has been decades of stagnation, underinvestment, neglect and failed policies in Nigeria, such that the country today does not feature in the international mining map as a worthy destination for mineral investment. What we have in fact is a sector that is devoid of major mineral investment⁴, replete with several artisanal, small scale and illegal miners whose activities have made very little, if any, impact on Nigeria's GDP.

Recent signals from the Federal Government seem to indicate a better appreciation of the necessity for the comprehensive reform of the mining sector as a means of addressing the policy failures of the past and opening the sector up to a wave of private sector investment. In the last few years, the Government has established a Ministry with specific focus on mineral development (1995), introduced a mineral policy (1997), promulgated

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³ Such as Canada, South Africa, the USA and Australia.

⁴ The only major mining project in the country since the late 1970s is the troubled Ikot Abasi Aluminum Smelter. Even that is a processing plant, as contrasted with a mineral extraction project.

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the Minerals and Mining Decree (1999) and conducted a major policy review through the Presidential Committee on Solid Minerals Development (2003).

Another such signals is the procurement last year, of mineral law expertise to review and revamp the current mining law in conformity with international best practices. This is a very important development as mining law reform is a fundamental pillar in the entire sector reform process.

My objective in this paper is not to conduct a section-by-section review of the principal legislation on mining, the Minerals and Mining Act of 1999. Rather, the thrust of the paper will be on certain aspects of the current legal and regulatory framework that are inimical to major private sector investment and which necessitate a revamp of the framework. In the course of the review, I will make specific suggestions for reform of the framework consistent with international best practices.

II. The Institutional Framework

The Mineral and Mining Act vests “the entire property in and control of all the minerals in, ...or upon the any land in Nigeria, ... in the Government of the Federation...”⁵. This is affirmed by the 1999 Constitution⁶. This puts Government in a frontal role in mineral development through the Federal Ministry of Solid Minerals Development established in 1995 to facilitate the development of the mining sector in accordance with the policy of the government.

The authority to manage the sector including responsibilities for policy formulation and the grant of mining titles is vested in the Minister for Solid Minerals Development⁷.

The key institutions and officials involved in sector administration include:

- the Director of Mines – handles the mining side of the sector inclusive of all technical operations and regulatory aspects of mineral activity
- Mines Inspectors –support the Director of Mines in the day to day administration of the sector
- the Geological Survey Department – established to develop and manage Nigeria’s geological database
- the Federal Ministry of the Environment – this is the agency charged with responsibility for the regulation of the environment. Consistent with the policy of the Government, it operates on a multi-sectoral basis and manages the

⁵ Section 1(1) of the Minerals and Mining Act 1999

⁶ By S.42 of the 1999 Constitution and S.44 of the Minerals and Mining Act

⁷ S.2 of the Act

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environmental aspects of mineral activity through a special unit dedicated to the mineral sector.

The institutional framework creates a situation of overlapping jurisdictions as an investor is expected to obtain the following permits from the following agencies:

- i. Department of Geological survey for detailed exploration data
- ii. Prospecting and mining rights from the Federal Ministry of Solid Minerals Development
- iii. Mines Directorate for operational permits
- iv. Ministry of Finance for tax exemption certificates (where applicable)
- v. Ministry of Industries for business permits
- vi. Ministry of Internal Affairs for expatriate quotas in respect of expatriate employees
- vii. Ministry of Environment for reviews of Environmental Impact Assessment plans
- viii. National Office for Technology Acquisition and Protection (NOTAP) in instances of technology transfer from abroad
- ix. Surface rights access permits from the State Government or the Local Government
- x. Negotiations with the community/family/individual for peaceful access to the land before mining can take place.

This convoluted regulatory structure can prolong the application process, increase transaction cost and is another hurdle to investment in the mining sector. Added to that, one of the underlying reasons for Nigeria's failure to attract mineral investment is the weakness of the regulatory institutions. It will be prudent if the interface between the investor and the myriad agencies is streamlined to the barest minimum by the establishment of a one stop shop for all licenses and permits. This is the standard in most jurisdictions.

III. The Legal Framework

Mineral Licensing

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Entry into the mining sector is limited to corporate entities incorporated under the Companies and Allied Matters Act, 1990⁸. The explicit requirements for the grant of a mineral title are:⁹

- (a) Proof of working capital
- b) bankers guarantee
- (c) a statement of the mineral proposed to be mined or the proposed area of the lease
- (d) proposed programme of prospecting

Applications for titles are required to be considered on the basis of priority of filing subject to the fulfillment of all requirements (S.11). Administrative Appeal is possible if the application is refused or revoked¹⁰.

Classes of mining title - The Act creates two classes of mining title: the *Prospecting Right* and the *Mining Lease*. A *Prospecting Right* may either be exclusive or non – exclusive depending on the area subject to the right. A *Special Exclusive Prospecting Right* is granted in respect of the largest possible prospecting property. An investor is required to have a *Prospecting Right* before he can apply for an *Exclusive Prospecting Right* or *Special Exclusive Prospecting Right*.

The other type of mining title, the *Mining Lease*, is granted to the holder of a *Prospecting Right* if he discovers minerals in commercial quantities during the prospecting stage. In the event of delay in issuing a *Mining Lease*, the Minister has the discretion to grant a *Temporary Mining Lease*¹¹ for such period and subject to such conditions as the Minister may decide. It is important to note however, that the grant of a *Temporary Mining Lease* does not confer any advantage on the licensee against any other applicant for title in respect of the same mineral property area. The effect is that there is no assurance that the investor will be granted mining title after committing capital on prospecting and successfully proving the geology of a prospect.

As for timeframes for administrative action, Minister is required to convey his decision in respect of an application to the applicant within 180 days; otherwise he may request for further information. However since appeals against the decision of the Minister can only lie to the Minister whose decision is final based on the report of an Investigating Committee (see S.132), it would be helpful if rather than allowing the Minister to be a judge in his own cause, the applicant can be given an opportunity to explore other options for redress without being subject to the powers of the Minister who revoked or refused to grant the licence.

⁸ S.5(1) Minerals and Mining Act, 1999

⁹ S.10 Minerals and Mining Act, 1999

¹⁰ S131 Minerals and Mining Act, 1999

¹¹ S.43 Minerals and Mining Act, 1999

Security and continuity of tenure

Given these risks, it is crucial that the legal framework for mineral exploitation incorporate mechanisms that will minimize the investor's exposure to risks by providing an acceptable level of security and continuity of tenure.

The concept of security and continuity of tenure takes a focal point in this discussion of the legal and regulatory framework in Nigeria because it is a decisive factor in the investment decision criteria of major investors and lenders due to the risks inherent in committing huge capital to high-risk exploration and extraction activity, including the challenges attendant to raising capital for development of a discovery, the volatility of prices and the cyclical nature of mineral markets.

The discussion following will therefore rest on that concept.

The concept of security and continuity of tenure basically means "*a legal entitlement of a rights holder to extraction rights in the event of a successful discovery*"¹² based upon very clear predetermined criteria. It also includes the expectation that titles will be of sufficiently adequate duration to cover the period necessary to allow for amortization of investment¹³ as this can address various uncertainties that may affect profitable mineral activity. Another aspect of the concept is the protection of the investor from such practices that will undermine his ability to develop a successful discovery or transfer his title to third parties.

The concept envisages:

- clarity and transparency in the law
- the removal or substantial reduction of administrative discretion on decisions affecting mineral title and the continuity of operations
- streamlined administrative processes

The existing law however allows for such levels of administrative discretion that could subject the investor to the whims and caprices of federal, state and local government officials in respect of such issues as access to land, licensing and transition of title. Thus, a potential exists for abuse of administrative powers affecting mineral title, while transaction costs are high.

The Act is characterised by a high level of state interference in respect of such matters as work plans and obligations, obligatory relinquishments, reporting requirements and detailed budgets and plans. In addition, the Minister is granted broad discretionary powers on several matters. An instance of this is his unfettered power on the issue of

¹² "*A review of the concept of Security of Mineral Tenure: issues and challenges*". Elizabeth Bastida, Journal of Energy and Natural Resources Law, Volume 19 No 1, February 2001 at page 31.

¹³ "*Security of Tenure as a key issue facing the international mining company: a South African perspective*". Michael O. Dale, Journal of Energy and Natural Resources Law, Volume 14 No 3, August 1996.

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priority between competing applications made in respect of the same area or overlapping areas.

In order to boost the confidence of investors, it is suggested that these powers should be curtailed. Further recommendations that might address the existing security of tenure issues in the current law include the requirement that titles:

- provide the holder of a prospecting title with a priority in the event of multiple applications for the same area.
- assure mineral tenure throughout all phases of mining; in particular, the investor must be assured of an automatic right to mine if minerals have been found in such quantities that justify a commercial project
- are subject to a time frame for the approval for permits
- may be transferred with minimal restrictions

The nature of mineral rights

Consistent with its ownership of all mineral resources in Nigeria¹⁴, the Federal Government is authorized by the Minerals and Mining Act to grant mineral titles for the exploitation of these resources. Given the clarity of the provisions which reserve title in minerals to the Federal Government through all stages of the mining process¹⁵, it is fair to conclude that a mining title does not give its holder property rights in the minerals.

Indeed, the appropriate conclusion would seem to be that a prospecting title only gives the holder access to search for minerals in the lease area whilst a Mining Lease does not vest title to the minerals in the lease area upon the grant of the mining title. The Mining Lease only gives the holder an exclusive right to mine the minerals in the area subject to the title and remove the minerals won subject to the payment of royalties prescribed in respect of the minerals¹⁶.

Thus my submission is that the nature of a mineral title under Nigerian law is a limited one, as in our petroleum law, to a right to “*search for, win, work and carry away*” the minerals discovered and mined in the title area. It stops short of vesting title in the minerals discovered or mined. This submission would find support in the statutory restriction against alienation of mineral title and the reservation of a pre-emption right in the minerals won in the lease area to the Federal Government.

¹⁴ S.42 CFRN 1999; S.1 Minerals and Mining Act, 1999.

¹⁵ SS.30(1) and 85(1) Minerals and Mining Act, 1999: a right of preemption in the minerals discovered, won, obtained or processed is reserved to the Federal Government. Under S.30 (2) of the Act, minerals discovered during prospecting operations may only be removed with the consent of the Minister.

¹⁶ S.57 Minerals and Mining Act, 1999.

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The titleholder only acquires a property right in the minerals after he has paid the appropriate royalties in respect of the minerals or and when Government waives its preemption to the minerals.

This again raises the issue of bankability of the mineral title, since a lender will be interested to understand the substance of his security in the title. As will be seen, there are limitations on the rights of the holder to alienate title. That is bad in itself, but it is less so if the substance of the tile does not amount to much. To cut to the issue, the real problem here is the preemption or reservation of title in the minerals to the Federal Government after the grant of the mineral title.

The opaqueness of the mineral title and the broad scope of the Ministerial discretion on several issues surrounding that interest cannot inspire sufficient confidence in prospective successors to the interest of the holder. In order to enhance the fungibility of mining title, the tenure and title provisions of subsequent revisions to the current law must be clearer and provide more secure, mortgageable and transferable mining rights.

Transferability/Mortgageability Of Title

The reality of modern mining is that a specialized industry structure has emerged. As a risk management strategy, major mining companies prefer to invest mainly proven properties. Exploration risks are thus often undertaken by smaller mining companies or syndicates of mining investors, colloquially referred to as “juniors”, which specialize in proving prospects for resale to the majors.

Given this industry structure, the titleholder of a prospecting right must be able to freely transfer his title or sub – divide portions of the title area in order to enable them cash out their investments or raise capital to develop more prospective zones within the property area.

Another dimension is that lenders to a mining project will require a mortgage of the mining title and rights to step in to the rights of the holder of the title as part of the security package for loans to the project. Therefore the ability of titleholder to transfer and alienate title either by assignment or mortgage is crucial to the procurement of financing for a mining project.

The current position of Nigerian law however, is that assignments, leases or mortgages of any mining title or any portion of the rights in any such titles can only be undertaken subject to the consent of the Minister¹⁷. Such consent is expressly stated to be discretionary. Hence, the Minister may either refuse to give his consent to the assignment or transfer or do so with or without any conditions. It is provided that any decision of the Minister taken in that regard is final¹⁸.

¹⁷ S.12 Minerals and Mining Act, 1999

¹⁸ Section 13 (3) Minerals and Mining Act, 1999

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Since this is a discretionary exercise of power by the Minister, one can understand the reluctance of mining houses or lenders to participate in mining projects in Nigeria.

Access to mineral resources vs surface rights

Mineral activity is notorious for conflicts with other legitimate use of natural resources such as private use, land use for national parks, silviculture, military use, water use and communal lands. These conflicts are apparent in the current mining code. The question is essentially how holders of mineral title can use land for the purposes envisaged in the title with minimal restrictions from holders of other rights in the land.

The Minerals and Mining Act, 1999 seeks to address potential land use conflicts by the establishment of a Mineral Resources Committee (MRC) for each state of the federation¹⁹ which has as part of its remit, the power to consider issues affecting grant of mineral titles.

The provisions of the Land Use Act, which regulate matters relating to access to land for mining purposes contemplates that land, has a special status. Hence, the Governor has the right to grant a right of occupancy and a corresponding power to revoke the right of occupancy for overriding public interest (28)(1).

Being a priority use of land that overrides all other uses of land; if the mineral deposit is in commercial quantity there is an overriding public interest in its use. A right of occupancy in respect of land can therefore be revoked in favour of a holder of a mining title through the compulsory acquisition process provided for in the Land Use Act. This simply requires the holder of the mining title to pay a prompt, fair and adequate compensation to the holder of surface right to the land.

In practice however, since the Land Use Act vests ownership of land comprised within the territory of a State in the Governor of the State, the process is not so simple particularly where both tiers of Government work at cross-purposes.

It is important to mention that access to a mining title area is not automatic where the minerals are yet to be proven. In this instance, the mineral titleholder must deal with the State Government or the Local Government as the case may be²⁰, and/or the host community or family/individual holder to reach an agreement in respect of access to the area. Many well ambitious investors have faltered at his stage and the truth of the matter is that there are no simple solutions given the attachment our people to land. Indeed, I recall that a particularly interesting gold mining prospect in one of the south western

¹⁹ S.3 Minerals and Mining Act, 1999

²⁰ Administration and control of land in urban areas is vested in the Governor while the Local Government is in charge of land within the rural area – SS. 1 & 2 of the Land Use Act, 1978

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states lost its technical partner after some members of the host community sought an application in court to restrain continued exploration activity after over \$2 million had been expended in exploration. The case lasted over four years until it was thrown out, but the net effect was a loss of the technical partner and enormous investment sunk in the project.

Conflicts in respect of the use and exploitation of mineral and water resources

In addition to the exclusive legislative powers granted to the Federal Government in respect of “*mines, minerals, including geological surveys*”, the 1999 Constitution also vests the Federal Government with exclusive legislative competence in respect of water resources affecting more than one state²¹.

The implementing legislations for these powers are the **Water Resources Decree 1993** and the **Minerals and Mining Decree 1999**. Both statutes create two separate federal agencies to oversee the administration of the use and exploitation of the natural resources covered by the statutes.

The specific jurisdictional issue arising in respect of the use and exploitation of water for mining purposes is the question of where the power to grant title or authorization for such purposes lie.

The collection, conveyance, storage and use of water for mining purposes by the holder of a Mining Lease is subject to a license issued at the discretion of the Minister for Solid Minerals Development under the **Minerals and Mining Decree 1999**²².

To confuse matters, the scope of the **Water Resources Act 1993** is quite broad and covers the use and taking of water from any watercourse or groundwater for any purpose²³.

Hence, if the holder of mining title considers it necessary to use or divert water from a watercourse listed in the Water Resources Act, his activities would appear to be subject to regulatory control of two ministries. He would require a Water License from the Minister of Solid Minerals Development whilst the Minister for Water Resources may prohibit the intended use or diversion of water if he apprehends that it “..... *is likely to interfere with the quantity or quality of any water in any watercourse or groundwater*”²⁴.

An amendment to the Water Resources Act that would confine the authority of the Minister for Water Resources to the use of water for any purpose except for use in

²¹ Second Schedule, Part 1 Exclusive Legislative List of the Constitution

²² Section 72 Minerals and Mining Act, 1999

²³ Section 3 Water Resources Act 1993

²⁴ Section 8(d) Water Resources Act 1993

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connection with the exploitation of minerals is recommended. This is more so as there is already a broader provision in the Minerals and Mining Act that prohibits the pollution of watercourses²⁵ generally.

Compensation provisions

The compensation provisions in the legislation are very important from the perspective of land use and environmental protection.

Under the relevant provisions of the Act²⁶, the Minister has the discretion to require, as a condition for the grant of a mineral title, the deposit of an appropriate sum with the Federal Government whether as a surety payment or as a reimbursement to the Government for any compensation it might have paid to the relevant state Government or owner/occupier of land.

Compensation is also payable where a certificate of occupancy held by the holder of surface rights is revoked in order to facilitate the issuance of a mining lease²⁷.

Compensation is payable for damage to trees, buildings, crops etc and is required to be prompt and reasonable, failing which the mineral title will be liable to suspension and revocation.

Compensation payable is to be calculated by the Minister²⁸ and must be paid within 14 days of receipt of the notice of requiring payment.

Environmental protection

It is an implied condition for the maintenance of a Mining Lease that lessees shall take due precautions in matters concerning pollution and environmental degradation²⁹, including the prevention of pollution of water or watercourses in the mining area in the course of mining or prospecting for minerals³⁰. Failure to comply with these requirements amongst other consequences, will require the payment of compensation to the owner or occupier of land for damages and pollution caused to the land or to water sources.

In addition, the holder of a Mining Lease may be required by the Minister to restore any area in respect of which mining operation has been carried out³¹ to its original position by such methods as the replacement of the surface soil, filling of worked areas, removal of tailings, dumps and heaps caused by mining operations³².

²⁵ S.65 Minerals and Mining Act, 1999

²⁶ SS.94 – 99, Part X Minerals and Mining Act, 1999

²⁷ S.62(1) Minerals and Mining Act, 1999

²⁸ S.96 Minerals and Mining Act, 1999

²⁹ S. 54(j) Minerals and Mining Act, 1999

³⁰ S.65 Minerals and Mining Act, 1999

³¹ SS.46 (1), 48(2) and 53 Minerals and Mining Act, 1999

³² S.67 Minerals and Mining Act, 1999

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It is pertinent to note that the Minerals and Mining Act incorporates the provisions of the **Federal Environmental Protection Act** by reference³³. However, it does not incorporate the provisions of the **Environmental Impact Assessment Act**. That is a very crucial omission, for the purposes of protection of the local ecosystem and also in view of the rigorous environmental requirements in international financings of extractive projects. It will be useful for proposed legislation to incorporate some of the requirements of the **Environmental Impact Assessment Act** such as environmental impact assessment plans (EIAs) and environmental protection plans (EPPs) and public hearings to give stakeholders the opportunity to evaluate the potential impact of the project on the host environment. Another important issue for proposed legislation are provisions dealing with mine reclamation and health and safety matters.

The Fiscal regime

In contrast to a fiscal code specific to mineral exploitation, the fiscal regime for mining in Nigeria is rather basic as it is derived from the general tax law applicable in the country for industrial activity. Hence, mining operations and profits earned from mineral exploitation are generally subject to taxation under the provisions of the Companies Income Tax Act.

Clearly there is an urgent case for a special tax study as a precursor to the introduction of a specialized fiscal regime for mining, which will capture all the risks, cyclicalities, and sensitivities specific to mineral investment as in the case with developed mining regimes.

Foreign Exchange Access and Use

According to the provisions of the **Foreign Exchange (Miscellaneous Provisions) Act 1995**, a holder of a mining title may retain and use earned forex and repatriate foreign capital imported and invested in Nigeria in any venture in freely convertible currency through authorized dealers.

Dispute Resolution

On a generally note, powers exercised under the Act are subject to judicial review under Administrative Law. The Minerals and Mining Act however provides for arbitration as an additional forum for dispute settlement between the Federal Government and titleholders. Such arbitrations are required to be conducted under the provisions of the **Arbitration and Conciliation Act**, Cap 19 Laws of the Federation of Nigeria 1990³⁴. This seems to follow the standard for countries with weak judicial systems.

Apart from potential disputes in respect of compensation for compulsory taking of title, the problem with this is that there is hardly any provision in the Act that specifically provides for or expressly envisages a dispute between a rights holder and the Government. Indeed the possibility of Arbitration is expressly foreclosed on some issues such as:

³³ S.127 (3) Minerals and Mining Act, 1999

³⁴ S.255

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- where the Minister is given absolute discretion as to whether or not to approve an alienation of mineral title³⁵
- where the Minister's decision in respect of an appeal against the revocation of a title of stated to be a final decision³⁶
- where a holder of a mining title aggrieved by a the payment of compensation for land surrendered for a public purpose is required to have his rights determined by the Federal High Court.

Investors can however have recourse to the **Nigerian Investment Promotion Commission Act 1995** ("NIPC Act") which provides that disputes between an authorized mining investor and any Government in Nigeria may be settled by negotiation or arbitration in accordance with:

- (i) *a procedure specified in the Arbitration and Conciliation Act, Cap 19 Laws of the Federation of Nigeria 1990; or*
- (ii) *the framework of any bilateral or multilateral agreement on investment protection entered into by the Government of Nigeria and the country in which the investor is a National; or*
- (iii) *any other contractually agreed dispute settlement machinery.*

In the event of a disagreement as to the method of settlement to be adopted between Government and the investor, it is further provided in the NIPC Act that "*the rules of the International Center for the Settlement of Investment Disputes (ICSID) shall apply*".

In addition, there is the option of insuring a project against specific risks under the political risk insurance cover issued by the Multilateral Investment Guarantee Agency of the World Bank.

Again, there are limitations with these options. Firstly, they have very limited application to local mining investors and, they have their own limitations even with respect to international investors. ICSID arbitration is only possible if the parties voluntarily submits to it, whilst a policy at with MIGA is only useful if the investment is very large as political risk insurance can be quite costly. In any event, it will be issued only if the Government consents to the cover. Finally, it is pertinent to note that there are only a handful of bilateral investment treaties (BITS) signed by the Federal Government with investors as of today.

IV. Conclusion

³⁵ S.13 (3) Minerals and Mining Act, 1999

³⁶ S.132 (3) Minerals and Mining Act, 1999

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In conclusion, it is apparent that the current legal and regulatory framework for mining in Nigeria does not lend itself to the standards of international best practices. However, an important precursor to the enactment of new mineral legislation has just commenced with the convening of this conference, that is stakeholder involvement in updating the current mining policy document to more clearly reflect current objectives and priorities of the Government regarding the mineral sector. Hopefully, all issues discussed in this paper will be captured in the policy in order to lay the foundation for their inclusion in the new mining code.

Finally, if major private sector investment is to be achieved in Nigeria, the capacity of its institutions to monitor and regulate the activity of investors must be strengthened whilst its mining code must be bankable according to the principles already discussed.

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Member of the Committee established by the Nigerian Government to develop a new legal, regulatory and policy framework necessary to attract private sector investment into Nigeria's mineral sector (2002). Subsequently retained by the Government to draft a new investment friendly Mining Code for Nigeria. In addition, currently drafting Nigeria's first gas legislation.

Appointed by the President of Nigeria (2004) to the *National Stakeholders Working Group of the Extractive Industries Transparency Initiative*, a new policy thrust aimed at fostering transparency in the management of revenues from oil, gas and activity.

He has addressed senior oil and gas executives and lawyers on diverse topic such as: "*The Legal, Regulatory and Policy Issues in Natural Gas Sector Liberalization in Nigeria*" (2002), "*The Legal and Regulatory Framework for Natural Gas Development in Nigeria*" (International Bar Association, 2000), "*Emerging issues in Natural Gas Utilization in Nigeria*" (International Bar Association, 1999); and "*Transnational Pipeline Projects – issues facing the development of a regional pipeline infrastructure*" (Offshore West Africa, 1999).

He has also authored several papers including: "*What's new in country risk management*" (2003), "*Nigeria: Antitrust Imperatives For An Energy Sector In Transition*" (2002), "*Cross – Border Oil and Gas Mergers: Nigerian Impacts*" (2002), "*From Exodus to Renaissance – Sector Reforms in African Mining*" (2001), "*Natural Gas Regulation In Nigeria*" (2000), "*Nigeria, The Gas Province*" (1998, revised, 2000), "*The West African Gas Pipeline Project – An Aide Memoir*" (1999), "*Solid Minerals in Nigeria*" (1996).

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