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TOWARDS AN INCLUSIVE AND RIGHTS-BASED ARTIFICIAL INTELLIGENCE GOVERNANCE FRAMEWORK FOR SUSTAINABLE DEVELOPMENT IN NIGERIA

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Abstract
As Artificial Intelligence (AI) becomes increasingly embedded in national development strategies, its dual potential to either advance or undermine sustainable development and human rights demands urgent scholarly and regulatory attention. In Nigeria, the integration of AI technologies in sectors such as healthcare, education, and environmental management presents remarkable opportunities for accelerating progress towards the attainment of the Sustainable Development Goals (SDGs). However, the lack of a coherent legal and policy framework for AI governance exposes the country to serious risks, including algorithmic bias, data privacy violations, and social exclusion, that could aggravate existing inequalities and infringe upon human rights. This study examines the intersection of AI, sustainable development, and human rights in Nigeria, and proposes an inclusive and rights-based AI governance framework for the country. The study assesses the adequacy of Nigeria's current AI governance framework, identifying key challenges to include regulatory gaps, weak data protection enforcement, and limited stakeholder participation. In response, the study offers targeted legal and policy recommendations grounded in international best practices and ethical principles: the development of sector-specific AI legislation, the institutionalization of multi-stakeholder governance mechanisms, and the promotion of transparency, accountability, and inclusivity in AI design and deployment. Importantly, the study argues that aligning AI governance with sustainable development and human rights imperatives is not only a legal and ethical necessity, but also a strategic pathway for Nigeria to harness AI as a force for equitable and inclusive growth.

Keywords: Artificial intelligence, Sustainable development, Human rights, Nigeria

I. Introduction
Artificial Intelligence (AI) has emerged as a transformative force in the 21st century, reshaping economies, governance, and societal structures globally. From optimizing service delivery in healthcare and education, to revolutionizing agricultural practices and environmental management, AI offers unprecedented opportunities for innovation and sustainable growth.[1] In Nigeria, AI is increasingly viewed as a strategic tool for addressing developmental challenges and accelerating progress towards the Sustainable Development Goals (SDGs).[2]In recognition of these possibilities, Nigeria launched the National Artificial Intelligence Strategy (NAIS) in 2024, positioning the country as part of global leaders in ethical and inclusive AI innovation.[3]However, while the NAIS

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[1]B Gleeson, 'How AI Is Reshaping the Future of Work Across Industries' (Forbes, 3 December 2024) <https://www.forbes.com/sites/brentgleeson/2024/12/03/how-ai-is-reshaping-the-future-of-work-across-industries/> accessed 20 June 2025.

[2] P Aloamaka and M Omozue, 'AI and Human Rights: Navigating Ethical and Legal Challenges in Developing Nations' (2024) 6(2) *Khazanah Hukum* 189.

[3] Federal Ministry of Communications, Innovation and Digital Economy, National Artificial Intelligence Strategy (August 2024) <https://ncair.nitda.gov.ng/wp-content/uploads/2024/08/National-AI-Strategy_01082024-copy.pdf> accessed 20 June 2025.

represents a bold step towards integrating AI into the country's national development priorities,[4] Nigeria's AI ecosystem remains nascent.

AI's dual nature, as both a driver of societal progress and a source of complex ethical dilemmas, necessitates urgent scholarly and regulatory engagement. While AI has the potential to enhance efficiency, inclusivity, and innovation, it also poses profound risks, particularly with respect to human rights and sustainable development. Concerns about algorithmic bias, opaque decision-making, pervasive surveillance, and systemic discrimination are increasingly prominent, especially in jurisdictions like Nigeria where vulnerable populations may lack the digital literacy or institutional protection necessary to defend their rights.[5]

Globally, there is a shift towards inclusive and rights-based AI governance frameworks that seek to balance innovation with ethical safeguards.[6] In Nigeria, where AI systems are being introduced into critical public services, the urgency for such governance is particularly acute.[7] Without robust legal, ethical, and participatory safeguards, the country risks exacerbating existing inequalities and undermining its extant human rights commitments[8].

This study adopts a doctrinal and comparative legal methodology to interrogate the intersection of AI, sustainable development, and human rights in Nigeria. Through doctrinal analysis, the study evaluates the adequacy of existing legal and policy frameworks governing AI in Nigeria. The comparative approach draws insights from international best practices, such as the European Union's AI Act and UNESCO's Recommendation on the Ethics of AI, to propose a normative model for inclusive and rights-based AI governance framework in Nigeria.[9]

2. Clarification of Concepts

Concepts, by their nature, are often fluid and subject to varying definitions, influenced by context. Hence, this study makes no attempt to present conclusive definitions, but to contextually define the concepts at the heart of the discussion. This conceptual framing is necessary to ensure clarity and consistency in the discussion.

2.1 Artificial Intelligence

AI refers, broadly, to the capacity of machines to perform tasks typically requiring human intelligence, including problem-solving, learning, decision-making, and natural language understanding.[10] The European Commission defines AI as "systems that display intelligent behaviour by analysing their environment and taking actions, with some degree of autonomy, to achieve specific goals."[11] AI technologies are generally categorised into narrow AI, which performs

[4] Pavestones Legal, 'Analysis of Nigeria's National Artificial Intelligence Strategy' (Mondaq, 19 August 2024) <https://www.mondaq.com/nigeria/new-technology/1507214/analysis-of-nigerias-national-artificial-intelligence-strategy> accessed 20 June 2025.
[5] U Anamoji, 'Ethical and Regulatory Framework of Artificial Intelligence (AI) in Nigeria' (2024) 12(3) *International Journal of Innovative Social Sciences & Humanities Research* 55, 58–60.
[6] Algorithm Watch, 'A Guide to the AI Act, the EU's New AI Rulebook' (Algorithm Watch, 14 November 2024) <https://algorithmwatch.org/en/ai-act-explained/> accessed 23 May 2025.
[7] Paradigm Initiative, 'Towards a Rights-Respecting Artificial Intelligence Policy for Nigeria' (2021) <https://paradigmhq.org/wp-content/uploads/2021/11/Towards-A-Rights-Respecting-Artificial-Intelligence-Policy-for-Nigeria.pdf> accessed 22 May 2025.
[8] United Nations Human Rights Council, 'The Right to Privacy in the Digital Age' UN Doc A/HRC/48/31 (13 September 2021) paras 12–18.
[9] R Akindele and SJ Adewuyi, 'Navigating the Ethical and Legal Terrains of AI Tool Deployment: A Comparative Legal Analysis' (2023) 21(1) *Communications of the IIMA* 1.
[10] S Russell and P Norvig, *Artificial Intelligence: A Modern Approach* (4th edn, Pearson 2021) 1.
[11] European Commission, 'White Paper on Artificial Intelligence: A European Approach to Excellence and Trust' COM (2020) 65 final, 1.

specific tasks, and general AI, which mimics human cognitive abilities across a wide range of functions.[12]

AI has evolved rapidly in recent times, largely driven by advances in machine learning, big data analytics, and cloud computing.[13] These developments have facilitated applications in finance, healthcare, security, education, and governance.[14] In Nigeria, emerging uses of AI include automated diagnostic systems in hospitals, fraud detection in banking, and smart agriculture.[15] However, the lack of a statutory definition or regulatory regime creates uncertainty regarding its ethical deployment and alignment with human rights principles.

2.2 Sustainable Development

Sustainable development is defined by the Brundtland Commission as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs."[16] The concept integrates economic growth, social inclusion, and environmental protection into a holistic framework. The United Nations 2030 Agenda for Sustainable Development, adopted in 2015, operationalises this vision through 17 SDGs.[17]

AI has been identified as a critical enabler of the SDGs, with the potential to enhance efficiency, accountability, and equity in development planning.[18] Applications include using AI to predict climate patterns, optimise transport systems, and expand access to education and healthcare.[19] Nevertheless, the realisation of AI's developmental potential in Nigeria is hindered by infrastructural limitations, digital divides, and insufficient public-private coordination.[20]

2.3 Human Rights

Human rights are fundamental entitlements inherent to all human beings, as codified in domestic constitutions and international instruments such as the Universal Declaration of Human Rights (UDHR) and the African Charter on Human and Peoples' Rights (ACHPR).[21] They include civil and political rights (e.g., the rights to privacy, expression, and due process)[22] and socio-economic rights (e.g., the rights to health, education, and development).[23]

AI presents new challenges for the protection of these rights. Predictive policing systems, biometric surveillance, and automated decision-making tools raise questions about due process, accountability, and bias.[24] Without proper safeguards, AI could entrench existing inequalities and

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[12] N Bostrom, *Superintelligence: Paths, Dangers, Strategies* (OUP 2014) 15–20.
[13] I Goodfellow, Y Bengio and A Courville, *Deep Learning* (MIT Press 2016) ch 1.
[14] PwC, 'Sizing the Prize: What's the Real Value of AI for Your Business and How Can You Capitalise?' (PwC Report, 2017) <https://www.pwc.com/gx/en/issues/analytics/assets/pwc-ai-analysis-sizing-the-prize-report.pdf> accessed 22 May 2025.
[15] Federal Ministry of Communications and Digital Economy, *National Digital Economy Policy and Strategy* (2020–2030) (Government of Nigeria, 2020) 18–20.
[16] World Commission on Environment and Development, Our Common Future (Oxford University Press 1987) 43.
[17] United Nations, 'Transforming Our World: The 2030 Agenda for Sustainable Development' UN Doc A/RES/70/1 (21 October 2015).
[18] UNDP, 'Artificial Intelligence and the Future of Development' (2021) <https://www.undp.org/publications/artificial-intelligence-and-future-development> accessed 22 May 2025.
[19] McKinsey Global Institute, 'Notes from the AI Frontier: Applying AI for Social Good' (2018) <https://www.mckinsey.com/featured-insights/artificial-intelligence/applying-artificial-intelligence-for-social-good> accessed 22 May 2025
[20] BusinessDay NG, 'Nigeria's Digital Infrastructure Gap Haunts AI Dreams' (BusinessDay NG, 12 August 2024) <https://businessday.ng/news/article/nigerias-digital-infrastructure-gap-haunts-ai-dreams/> accessed 23 May 2025.
[21] Universal Declaration of Human Rights (adopted 10 December 1948 UNGA Res 217 A(III)); African Charter on Human and Peoples' Rights (adopted 27 June 1981, entered into force 21 October 1986) (1982) 21 ILM 58.
[22] Constitution of the Federal Republic of Nigeria 1999 (as amended) ss 33–46.
[23] Ibid ss 16-18.
[24] Sandra Wachter, Brent Mittelstadt and Chris Russell, 'Why Fairness Cannot Be Automated: Bridging the Gap Between EU Non-Discrimination Law and AI' (2021) 43(3) *Computer Law & Security Review* 105567.

perpetuate systemic discrimination.[25] In Nigeria, the Constitution guarantees several fundamental rights; however, the absence of a data protection culture and weak institutional oversight threaten their effective enforcement in the AI context.[26] This necessitates a rights-based governance framework that incorporates both legal and ethical standards.[27]

3. AI as a Double-Edged Sword in Achieving the SDGs in Nigeria

AI is increasingly seen as a transformative force capable of addressing complex socio-economic and environmental challenges, particularly in the Global South. In Nigeria, AI is being deployed in sectors such as healthcare, education, agriculture, and environmental management, where it supports the realisation of several SDGs. However, while AI presents opportunities for innovation and development, it also introduces significant risks to human rights, governance, and social justice if not properly managed. Thus, AI functions as a double-edged sword in Nigeria's development agenda.

3.1 AI as a Catalyst for Sustainable Development

AI is making contributions toward accelerating the attainment of the SDGs in Nigeria. In agriculture, platforms such as *Farmcrowdy* and *Thrive Agric* use AI to provide farmers with real-time information on weather conditions, pest outbreaks, and soil fertility, thereby enhancing crop yield and food security in alignment with SDG 2 (Zero Hunger).[28] Similarly, *Plant Village Nuru* application enables farmers to diagnose crop diseases using smartphone technology, allowing for early intervention and minimizing losses[29].

In the healthcare sector, AI-driven innovations are helping bridge critical gaps in access to and quality of care. Nigerian-developed applications like *Ubenwa* use AI to analyse infant cries and detect birth asphyxia, an often-fatal condition in newborns, thereby offering a cost-effective diagnostic tool to reduce infant mortality in resource-limited settings.[30] AI is also increasingly used in diagnostic imaging and disease prediction, improving early detection and tailored treatment plans, particularly in remote and underserved areas.[31]

The education sector has equally benefited. Platforms such as *uLesson* and *Scholar X*leverage AI to deliver personalized learning tailored to students' learning styles and needs. These systems help bridge educational inequality by offering accessible and adaptive content to students across different regions, supporting SDG 4 (Quality Education)[32].

AI technologies are also being applied in environmental management. Nigerian startups like *Quadloop* and *Chiniki Guard* deploy AI-based systems for energy efficiency monitoring and

[25]Algorithm Watch, 'Automating Society Report 2020: Nigeria' (2020) <https://automatingsociety.algorithmwatch.org/nigeria> accessed 23 May 2025.
[26] Uche Anamoji, 'Ethical and Regulatory Framework of Artificial Intelligence (AI) in Nigeria' (2024) 12(3) *International Journal of Innovative Social Sciences & Humanities Research* 58.
[27] UN Office of the High Commissioner for Human Rights (OHCHR), 'The Right to Privacy in the Digital Age' (A/HRC/48/31, 13 September 2021).
[28] M Paul, 'New study illuminates Nigeria's AI-driven path to economic growth and climate impact' (Down to Earth, 13 August 2024) <https://www.downtoearth.org.in/africa/new-study-illuminates-nigerias-ai-driven-path-to-economic-growth-and-climate-impact> accessed 23 June 2025.
[29] LM Mrisho and others, 'Accuracy of a Smartphone-Based Object Detection Model, Plant Village Nuru, in Identifying the Foliar Symptoms of the Viral Diseases of Cassava–CMD and CBSD' (2020) 11 Frontiers in Plant Science <https://www.frontiersin.org/journals/plant-science/articles/10.3389/fpls.2020.590889/full> accessed 23 June 2025.
[30]iAfrica, 'Ubenwa – AI Neonatal Care in Nigeria' (29 April 2025) <https://iafrica.com/ubenwa-ai-neonatal-care-in-nigeria/> accessed 23 June 2025.
[31] Nairobi Garage, 'Smart Healthcare: The Role of Artificial Intelligence in Achieving SDG 3' (12 May 2023) <https://nairobigarage.com/artificial-intelligence-role-in-smart-healthcare/> accessed 23 May 2025.
[32]ScholarX, 'Our Products' (2024) <https://www.scholarx.co> accessed 23 May 2025; uLesson, 'Personalised Learning Tools' (2023) <https://www.ulesson.com> accessed 23 May 2025.

environmental sustainability tracking.[33] AI is also used to monitor deforestation, predict extreme weather events, and support climate-smart agricultural practices. These applications bolster Nigeria's capacity to mitigate and adapt to climate change in line with SDG 13 (Climate Action)[34].

AI, therefore, offers a transformative toolset for addressing development challenges, increasing efficiency, and stimulating local innovation. It has the potential not only to support Nigeria's progress toward achieving the SDGs but also to position the country as a regional hub for ethical and innovative AI solutions.

3.2 Risks and Threats to Human Rights and Inclusion

Notwithstanding its developmental potential, the use of AI in Nigeria also raises ethical, legal, and socio-political concerns, particularly in relation to human rights, transparency, and equity. One of the most pressing challenges is algorithmic bias, which arises when AI systems trained on non-representative datasets produce discriminatory outcomes. In Nigeria, where much of the data used to train AI systems originates from foreign or non-contextualised sources, there is a real risk that these technologies could reinforce structural inequalities, especially in areas such as employment, financial services, and criminal justice.[35]

Data privacy violations are another major concern. Although Nigeria enacted the Data Protection Act in 2023, enforcement remains weak, and awareness of privacy rights is low.[36] Many AI systems deployed in the country operate without proper safeguards for data minimization, informed consent, or accountability. This undermines individuals' right to privacy and exposes them to potential abuse through surveillance, profiling, and unauthorized data sharing.[37]

The digital divide further exacerbates these challenges. Large swaths of the Nigerian population, especially in rural or economically disadvantaged regions, lack reliable internet access, digital skills, or the infrastructure needed to benefit from AI services.[38] Consequently, while some Nigerians enjoy the benefits of AI-enhanced services, others are systematically excluded, thereby widening existing inequalities and undermining the inclusive ethos of the SDGs, particularly SDG 10 (Reduced Inequalities).

Furthermore, the opacity of AI systems, commonly referred to as the "black box" problem, complicates efforts to ensure transparency and accountability. Most AI algorithms are not easily explainable, and affected individuals often have no means of understanding how decisions impacting them were made.[39] This lack of clarity can be particularly harmful when AI systems are used in sensitive areas like health diagnostics, school admissions, credit scoring, or public welfare services.

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[33] Skyline University Nigeria, 'AI for Environmental Sustainability' (30 September 2024) <https://www.sun.edu.ng/knowledgebase-articles/ai-for-environmental-sustainability/> accessed 23 May 2025.

[34] Wallenberg AI, Autonomous Systems and Software Program, AI, Sustainability and Agenda 2030 (2023) 10 <https://wasp-hs.org/wp-content/uploads/2023/11/AI-sustainability-and-agenda-2030-Report.pdf> accessed 21 June 2025.

[35] D Opebiyi, 'Unlocking AI in Nigeria: Why Governance, Ethics, Privacy Must Shape Our Digital Future' The Guardian Nigeria (10 June 2025) https://guardian.ng/opinion/unlocking-ai-in-nigeria-why-governance-ethics-privacy-must-shape-our-digital-future/ accessed 21 June 2025.

[36] OR Olawole, 'The Adoption of Artificial Intelligence (AI) in Nigeria's Legal Landscape: Examining Intellectual Property, Data Privacy, and Ethical Considerations' (Mondaq, 10 January 2025) <https://www.mondaq.com/nigeria/privacy-protection/1567242/the-adoption-of-artificial-intelligence-ai-in-nigerias-legal-landscape-examining-intellectual-property-data-privacy-and-ethical-considerations> accessed 21 June 2025.

[37] DataGuard, 'The Growing Data Privacy Concerns with AI: What You Need to Know' (2024) <https://www.dataguard.com/blog/growing-data-privacy-concerns-ai/> accessed 23 May 2025.

[38] World Bank, Nigeria Digital Economy Diagnostic Report (2020) 19 <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/474491585732734360/nigeria-digital-economy-diagnostic-report> accessed 23 May 2025.

[39] National Human Rights Commission, 'Unregulated AI Threatens Human Rights – Ojukwu Warns' (26 March 2025) <https://www.nigeriarights.gov.ng/nhrc-media/news-and-events/540-unregulated-ai-threatens-human-rights-ojukwu-warns.html> accessed 21 June 2025.

Finally, while AI may stimulate innovation and improve efficiency, there is concern that it may displace workers, particularly in sectors involving repetitive tasks. Without parallel investments in education, digital re-skilling, and social safety nets, the country risks exacerbating unemployment and socio-economic instability.[40]

4. Nigeria's Legal and Policy Framework on AI Governance

Nigeria's approach to AI governance is at a formative stage. It features emerging strategies, institutional efforts, and sector-specific regulations, but lacks a comprehensive, enforceable legal framework directly addressing AI technologies. This fragmented landscape presents both opportunities for innovation and challenges concerning ethical oversight, rights protection, and regulatory certainty.

4.1 Strategic and Policy Foundations

The foundational digital policy is the National Digital Economy Policy and Strategy (NDEPS) 2020–2030, launched by the Federal Ministry of Communications and Digital Economy (FMCDE). The NDEPS, structured around eight strategic pillars, including digital infrastructure, emerging technologies, and cybersecurity, identifies AI as a critical component of Nigeria's digital transformation agenda. However, while NDEPS acknowledges AI's importance, it does not provide binding or specific regulatory tools to guide its ethical deployment or manage risks such as bias, transparency, or accountability.[41]In 2024, the National Artificial Intelligence Strategy (NAIS) was introduced by the FMCDE. NAIS articulates five pillars: foundational infrastructure, talent development, sectoral integration, responsible AI governance, and global cooperation, envisioning Nigeria as a regional AI leader committed to ethical and inclusive innovation.[42]

4.2 Legal Instruments Relevant to AI Governance

Although Nigeria has no standalone AI law, several legislative instruments touch upon AI-relevant concerns:

i. The Nigeria Data Protection Act, 2023 (NDPA) 2023 forms the backbone of data governance in Nigeria. Among others, the law regulates the processing of personal data and protects the rights of data subjects, critical elements for AI systems reliant on large datasets.[43] The NDPA also strengthened data privacy enforcement, and established the Nigeria Data Protection Commission (NDPC) as regulatory agency. While the NDPA supplants the Nigeria Data Protection Regulations, 2019 (NDPR), the NDPC replaces the Nigeria Data Protection Bureau (NDPB).However, neither the NDPR nor the NDPA specifically regulate AI issues, such as automated decision-making, profiling, or algorithmic bias.[44]Moreover, while the NDPR continued to exist as a subsidiary legislation under the NDPA, in February 2025, the NDPC issued the NPDA-General Application and Implementation Directive (GAID), by which it made the decision in article 3(3) thereof to cease to apply the NDPR as a legal instrument for regulating data privacy and protection. The GAID was made pursuant to the powers contained in sections 61-62 NDPA. While it has been submitted that the provision of article 3(3) GAID does not amount to an outright repeal of the NDPR, but only a decision by the NDPC to stop enforcing or using the NDPR

[40] M Zajko, 'Artificial Intelligence, Algorithms, and Social Inequality: Sociological Contributions to Contemporary Debates' (2022) 16 *Sociology Compass* e12962.
[41] Federal Ministry of Communications and Digital Economy, National Digital Economy Policy and Strategy (2020–2030) (2020) 10
[42]ibid 12–20.
[43]Simmons Cooper Partners, 'Artificial Intelligence and Nigerian Data Protection' (Mondaq, 13 August 2024) <https://www.mondaq.com/nigeria/privacy-protection/1505422/artificial-intelligence-and-nigerian-data-protection> accessed 21 June 2025.
[44] Nigeria Data Protection Act 2023 (Act No. 4 of 2023), s 2(1).

in its regulatory activities as a legal instrument for regulating data privacy and protection,[45] in our view, the effect is nonetheless largely the same.

ii. The Cybercrimes (Prohibition, Prevention, etc.) Act, 2015 (as amended 2024) criminalises unauthorized access to data, identity theft, and cyberstalking, among others, providing indirect safeguards for AI-enabled systems.[46] The provisions on unauthorized access, tampering, or deletion of data, has impact on AI systems that process and analyze large datasets, the provisions on online harassment, fake news, and hate speech will require AI systems to be more robust and accurate, while creating accountability for online content generated by AI for social media use.

iii. Nigeria's intellectual property regime (e.g., Copyright Act and Patents and Designs Act) protects creative works and inventions. The Copyright Act 2022 recognizes authorship by natural persons but is silent on whether AI systems can hold copyright. This legal ambiguity raises questions about ownership and liability in AI-generated works.[47] Similarly, the Patents and Designs Act requires that an inventor be a natural person, thereby excluding AI from being recognized as an inventor.[48] Legal scholars argue that Nigeria must reform its IP laws to accommodate emerging technologies, and it has been submitted that the absence of AI-specific provisions in IP law creates uncertainty for innovators and may hinder investment in AI-driven industries[49].

4.3 Institutional Framework

The regulatory ecosystem for AI governance in Nigeria includes several core institutions:

i. National Information Technology Development Agency (NITDA)

Established under the NITDA Act 2007, NITDA is Nigeria's principal agency for IT development and regulation. It is tasked with formulating policies, setting standards, and coordinating IT activities across sectors.[50] In the AI domain, NITDA is responsible for the National Artificial Intelligence Strategy (NAIS), which outlines Nigeria's vision for ethical and inclusive AI innovation.[51] NITDA also facilitates interagency collaboration through its Stakeholder Management and Partnerships Department, which builds alliances with government bodies, academia, and international organizations to promote digital inclusion and innovation.[52] This department plays an important role in harmonizing AI-related initiatives across ministries and agencies. Previous to the NDPA and NDPC, NITDA was responsible for data and privacy rights through the NDPR and its Nigerian Data Protection Bureau.

ii. National Centre for Artificial Intelligence and Robotics (NCAIR)

NCAIR is a special-purpose vehicle under NITDA, established to promote research and development in AI, robotics, and emerging technologies.[53] It serves as a hub for innovation-driven entrepreneurship, capacity-building, and digital fabrication. NCAIR's mandate includes fostering

[45] O Babalola, 'Article 3(3) of the NDPA-GAID 2025 Has Not Repealed the Nigeria Data Protection Regulation 2019: Clearing the Misconception" (Law Pavillion Blog, 29 August 2025) <https://lawpavillion.com/blog/article-33-of-the-ndpa-gaid-2025-has-not-repealed-the-nigeria-data-protection-regulation-2019-clearing-the-misconception/>

[46] Cybercrimes (Prohibition, Prevention, etc.) Act 2015, s 6–8.

[47] . Copyright Act 2022, s 1; Pavestones Legal, 'Artificial Intelligence in Nigeria: Legal and Regulatory Guidance' (12 November 2023) <https://pavestoneslegal.com/artificial-intelligence-in-nigeria-legal-and-regulatory-guidance/> accessed 21 June 2025.

[48] Patents and Designs Act, Cap P2 LFN 2004, s 2.

[49] MP Richard, 'Legal Perspective on the Use of Artificial Intelligence in Corporate Governance in Nigeria: Potentials and Challenges' (2024) 34(48) *Journal of Legal Studies* 97.

[50] National Information Technology Development Agency Act 2007, s 6.

[51] Federal Ministry of Communications, Innovation and Digital Economy, *National Artificial Intelligence Strategy* (2024) <https://fmcide.gov.ng/initiative/nais/> accessed 21 June 2025.

[52] NITDA, 'Stakeholder Management and Partnership Department' <https://nitda.gov.ng/department/stakeholder-management-and-partnership/> accessed 21 June 2025.

[53] NCAIR, 'International Engagement Strategy' <https://ncair.nitda.gov.ng/international-engagement-ie/> accessed 21 June 2025.

partnerships with academic institutions, tech startups, and international bodies to advance Nigeria's AI ecosystem.[54] A notable example of interagency collaboration is the Unified API Framework developed jointly by NITDA and NCAIR, which integrates over 320 digital solutions to streamline government service delivery.[55] This initiative demonstrates how AI can enhance interoperability and efficiency across public institutions.

iii. Nigerian Data Protection Commission (NDPC)

Data is at the heart of AI systems. The NDPC is established under the NDPA, and is the regulatory agency for data protection in Nigeria, ensuring the lawful and utilization of data in the country. The NDPC administers the NDPA and has issued the GAID 2025 disclosing its implementation strategies. The NDPA replaces the Nigeria Data Protection Bureau that was under the NITDA.

Sectoral regulators such as the Central Bank of Nigeria (CBN) and the Nigerian Communications Commission (NCC) also play roles:

i. CBN's Framework for Regulatory Sandbox Operations (2021) and Guidelines on Open Banking (2023) supports fintech innovation while addressing consumer protection and data risks linked to AI tools like credit scoring[56].
ii. NCC's Guidelines on Cybersecurity (2020) focus on data protection and automated system integrity in telecoms, but do not cover ethical AI concerns[57].

These policies reflect growing institutional awareness of AI's potential and risks, though they remain sector-specific and fragmented.

4.4 Legislative Gaps and Ongoing Efforts

As of August 2025, Nigeria's National Assembly has not enacted specific legislation dedicated to regulating AI, leaving the country without a comprehensive legal framework to govern AI development and deployment.[58] Notwithstanding this legislative gap, there is growing momentum within Nigeria's policy and professional circles to address AI governance. Legislative committees, including those within the Senate and House of Representatives, have initiated discussions on the need for AI-specific laws that balance the promotion of innovation with the protection of fundamental rights and accountability in AI systems.[59] Professional bodies, such as the Nigerian Bar Association (NBA) and the Institute of Software Practitioners of Nigeria (ISPON), have also actively advocated for regulatory frameworks that address AI's ethical, legal, and societal implications.[60] These organisations have highlighted the importance of laws that ensure transparency, fairness, and accountability in AI applications, particularly in sectors like healthcare, finance, and public administration, where AI adoption is accelerating.

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[54] ibid.

[55] A Onikoyi, 'Building the Future: NITDA and NCAIR Drive Nigeria's Digital Transformation Through AI' Vanguard (30 December 2023) <https://www.vanguardngr.com/2023/12/building-the-future-nitda-and-ncair-drive-nigerias-digital-transformation-through-ai/> accessed 21 June 2025.

[56] Central Bank of Nigeria, Framework for Regulatory Sandbox Operations (2021) <https://www.cbn.gov.ng/out/2021/ccd/framework%20for%20regulatory%20sandbox%20operations.pdf> accessed 23 May 2025; Central Bank of Nigeria, Guidelines on Open Banking (2023) <https://gbc-law.com/assets/publications/CBN-FRAMEWORK-FOR-REGULATORY-SANDBOX-OPERATIONS-QR-PAYMENTS.pdf> accessed 23 May 2025.

[57] Nigerian Communications Commission, Guidelines on Cybersecurity (2020) <https://www.thecable.ng/ncc-releases-guidelines-preventing-cyber-attack/> accessed 23 May 2025.

[58] National Institute for Legislative and Democratic Studies, 'National Assembly Moves to Establish Legal Framework for Artificial Intelligence in Nigeria' (NILDS, 25 April 2024) <https://nilds.gov.ng/national-assembly-moves-to-establish-legal-framework-for-artificial-intelligence-in-nigeria/> accessed 23 May 2025.

[59] ibid.

[60] Nigerian Bar Association, 'Emerging Technologies and Legal Reform: Proceedings of the 2023 Annual Tech Law Summit' (NBA, 2023).

Legal scholars have further underscored the urgency of developing rights-based AI legislation tailored to Nigeria's unique socio-legal context.[61] Such legislation should address critical issues, including the protection of privacy, prevention of algorithmic bias, and mechanisms for redress in cases of harm caused by AI systems, while aligning with Nigeria's constitutional framework and international human rights obligations.[62] Without such tailored laws, Nigeria risks falling behind global AI governance standards, such as those articulated in the OECD Principles on Artificial Intelligence and UNESCO's Recommendation on the Ethics of Artificial Intelligence, which emphasize human-centric and ethical AI development.[63] The absence of specific AI legislation also hampers Nigeria's ambition to become a regional AI hub as articulated in the NAIS.

5. Critical Gaps in Nigeria's AI Governance Ecosystem

Despite Nigeria's commendable efforts to articulate a national vision forAI through strategic initiatives such as the NAIS, the country's AI governance ecosystem remains fragmented and underdeveloped. Several critical gaps hinder the effective regulation, ethical deployment, and inclusive adoption of AI technologies.

5.1 Absence of a Comprehensive Legal Framework

Nigeria currently lacks a dedicated legal framework specifically tailored to AI. Existing laws, such as the NDPA and the Cybercrimes Act 2015, offer only partial coverage and do not address core AI-specific issues such as algorithmic accountability, explainability, liability, and autonomous decision-making[64]. This legal vacuum creates uncertainty for developers, regulators, and users, and may deter responsible innovation.[65]

5.2 Lack of Human Rights Due Diligence

One of the most pressing gaps in Nigeria's AI governance framework is the absence of mandatory human rights due diligence (HRDD) in the design, deployment, and oversight of AI systems. Despite the increasing integration of AI into public and private sector decision-making, there is no legal obligation for developers or deployers to assess the potential human rights impacts of their technologies prior to implementation.[66]

This omission is particularly concerning given the risks of algorithmic bias, privacy violations, and discrimination, especially in sensitive domains such as law enforcement, healthcare, and financial services. The National Human Rights Commission (NHRC) has acknowledged these risks and advocated for the institutionalization of HRDD as a safeguard against rights infringements. At a 2025 webinar hosted by the International Network for Corporate Social Responsibility (IN-CSR), the NHRC emphasized the need for proactive engagement with tech companies and the development of ethical frameworks that place human dignity at the core of AI governance.[67]

Furthermore, a 2025 submission to the UN Working Group on Business and Human Rights highlighted that Nigeria lacks statutory mechanisms for human rights impact assessments (HRIAs)

[61]ibid.
[62]ibid.
[63]UNESCO, 'Recommendation on the Ethics of Artificial Intelligence.' (2022) <https://unesdoc.unesco.org/ark:/48223/pf0000381137> accessed 24 May 2025.
[64]Olaide Awwal-Bolanta, 'Artificial Intelligence Governance in Nigeria: Analysis of Gaps in Existing Legal Frameworks' (2024)(8) *Ekiti State University Law Journal*<https://www.researchgate.net/publication/386371071_Artificial_Intelligence_Governance_In_Nigeria_Analysis_Of_Gaps_In_Existing_Legal_Frameworks_ARTIFICIAL_INTELLIGENCE_GOVERNANCE_IN_NIGERIA_ANALYSIS_OF_GAPS_IN_EXISTING_LEGAL_FRAMEWORKS> accessed 21 June 2025.
[65]A Salihu, 'Regulating the Future: The Current State and Prospects of Artificial Intelligence Policy in Nigeria' (2024) SSRN <https://ssrn.com/abstract=5117653> accessed 21 June 2025.
[66] O Okai, 'NHRC, Other Push for Ethical AI Governance in Nigeria' (The Fact Daily, 20 March 2025) <https://thefact.ng/nhrc-other-push-for-ethical-ai-governance-in-nigeria/> accessed 23 June 2025.
[67]Techpoint Africa, 'Nigeria's Human Rights Body Steps into AI Regulation' (21 March 2025) <https://techpoint.africa/news/nigerias-human-rights-ai/> accessed 21 June 2025.

in AI-related projects, leaving a regulatory vacuum that could enable unchecked technological harm.[68] Without HRDD, there is limited accountability for AI-driven decisions that may adversely affect individuals or communities, particularly those already marginalized.

5.3 Data Quality and Infrastructure Deficits

AI systems are only as effective as the data and infrastructure that support them. In Nigeria, data quality remains a significant barrier to responsible AI development. Many datasets are incomplete, outdated, or unstructured, making them unsuitable for training accurate and unbiased AI models.[69] This problem is compounded by the lack of standardized data collection protocols and limited interoperability between government databases.

The International Monetary Fund (IMF), in its 2024 AI Preparedness Index, ranked Nigeria among the least prepared countries for AI deployment due to inadequate digital infrastructure.[70] The report noted that while Nigeria has launched promising initiatives, such as its first multilingual large language model and a national AI strategy, these efforts are undermined by persistent deficits in broadband connectivity, data centers, and cloud computing capacity.

According to a 2024 BusinessDay report, Nigeria faces a 90,000-kilometer fiber infrastructure gap, resulting in unreliable internet access that hampers AI deployment, especially in rural areas.[71] The country also lacks high-performance computing (HPC) facilities and modern data centers capable of supporting large-scale AI research and applications[72]. These infrastructural shortcomings not only limit innovation but also risk widening the digital divide, thereby excluding vulnerable populations from the benefits of AI. To address these challenges, the NAIS recommends investments in clean energy AI clusters, tax incentives for infrastructure development, and localized data ecosystems that reflect Nigeria's socio-cultural realities.[73] However, implementation remains slow, and without urgent action, Nigeria risks falling further behind in the global AI race.

6. Comparative Perspectives

To develop a robust and context-sensitive framework for AI governance in Nigeria, it is instructive to examine comparative models from other jurisdictions and global institutions. These perspectives offer valuable insights into regulatory design, ethical safeguards, and inclusive innovation strategies that can inform Nigeria's evolving AI governance ecosystem.

6.1 The European Union: Risk-Based Regulation and the AI Act

The European Union (EU) has taken a pioneering role in AI regulation through its proposed Artificial Intelligence Act (AI Act), which adopts a risk-based approach to AI governance. The Act classifies AI systems into four categories: unacceptable, high-risk, limited-risk, and minimal-risk,

[68] D Nwosu and E Onuegbu, 'Human Rights Dimensions of Artificial Intelligence and Governance in Nigeria' (UN Working Group on Business and Human Rights, 2025) <https://www.ohchr.org/sites/default/files/documents/issues/business/workinggroupbusiness/wg-business-cfis/2025/subm-use-artificial-intelligence-priv-sect-international-ne2rk-corporate-sociality.pdf> accessed 21 June 2025.

[69] Pavestones Legal, 'Artificial Intelligence in Nigeria: Legal and Regulatory Guidance' (12 November 2023) <https://pavestoneslegal.com/artificial-intelligence-in-nigeria-legal-and-regulatory-guidance/> accessed 21 June 2025.

[70] IMF, 'AI Preparedness Index: Nigeria's Infrastructure Challenges' (Digital Watch Observatory, 28 June 2024) <https://dig.watch/updates/imf-report-highlights-nigerias-ai-infrastructure-challenges> accessed 21 June 2025.

[71] T Jaiyeola, 'Nigeria's Digital Infrastructure Gap Haunts AI Dreams' *BusinessDay* (12 August 2024) <https://businessday.ng/news/article/nigerias-digital-infrastructure-gap-haunts-ai-dreams/> accessed 21 June 2025.

[72] S Nwite, 'IMF Report Reveals Nigeria and Other Developing Countries' Digital Infrastructure Deficit for AI Deployment' *Tekedia* (27 June 2024) <https://www.tekedia.com/imf-report-reveals-nigeria-and-other-developing-countries-digital-infrastructure-deficit-for-ai-deployment/> accessed 21 June 2025.

[73] Federal Ministry of Communications, Innovation and Digital Economy, *National Artificial Intelligence Strategy* (2024) <https://fmcide.gov.ng/initiative/nais/> accessed 21 June 2025.

each subject to varying degrees of regulatory scrutiny.[74] High-risk systems, such as those used in biometric identification or credit scoring, are subject to strict requirements on transparency, human oversight, and data governance.[75]

The EU's approach is notable for its emphasis on human rights protection, including non-discrimination, privacy, and human dignity. It also mandates conformity assessments and the creation of a European AI Board to ensure consistent enforcement across member states.[76] Nigeria can draw from this model by adopting a tiered regulatory framework that balances innovation with rights protection, particularly in sensitive sectors like healthcare and law enforcement.

6.2 UNESCO's Recommendation on the Ethics of Artificial Intelligence

In 2021, UNESCO adopted the Recommendation on the Ethics of Artificial Intelligence, the first global normative instrument on AI ethics, endorsed by 193 member states, including Nigeria.[77] The Recommendation outlines ten core principles, including human rights, environmental sustainability, diversity and inclusion, and accountability.[78] It also provides policy action areas such as data governance, education, and gender equality, offering a holistic blueprint for ethical AI deployment.

UNESCO's framework is particularly relevant for Nigeria, as it emphasizes contextual adaptability and encourages member states to develop national AI strategies aligned with local values and development goals.[79] The Recommendation's emphasis on human oversight and algorithmic transparency can guide Nigeria's efforts to institutionalize ethical review mechanisms and impact assessments.

6.3 South Africa, Kenya, and Ghana: Emerging African Models

Several African countries have begun to articulate national AI strategies that reflect regional priorities and peculiarities. South Africa, for instance, has established a Presidential Commission on the Fourth Industrial Revolution, which recommends the development of AI-specific legislation and investment in digital infrastructure.[80] The country's approach emphasizes public-private partnerships and skills development, recognizing the need to build local capacity for AI innovation.

Kenya has adopted a more sectoral approach, integrating AI into its digital economy blueprint and piloting AI applications in agriculture and public health. However, concerns about data privacy and algorithmic bias have prompted calls for stronger regulatory oversight.[81] Similarly, Ghana has launched initiatives to promote AI in education and governance, but lacks a comprehensive legal framework to address ethical and human rights concerns.[82]

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[74] European Commission, 'Proposal for a Regulation Laying Down Harmonised Rules on Artificial Intelligence (Artificial Intelligence Act)' COM(2021) 206 final.
[75] European Parliament, 'Artificial Intelligence Act: EU Rules for Trustworthy AI' (2024) <https://www.europarl.europa.eu/news/en/headlines/society/20230417STO80111/artificial-intelligence-act-eu-rules-for-trustworthy-ai> accessed 21 June 2025.
[76] European Commission, 'Regulatory Framework Proposal on Artificial Intelligence' (2021) <https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai> accessed 21 June 2025.
[77] UNESCO, 'Recommendation on the Ethics of Artificial Intelligence' (2021) <https://www.unesco.org/en/articles/recommendation-ethics-artificial-intelligence> accessed 21 June 2025.
[78] UNESCO, 'Recommendation on the Ethics of Artificial Intelligence' (2021) <https://www.unesco.org/en/articles/recommendation-ethics-artificial-intelligence> accessed 21 June 2025.
[79] UNESCO, 'Policy Dialogue on AI Governance' (2024) <https://www.unesco.org/en/articles/policy-dialogue-ai-governance> accessed 21 June 2025.
[80] Wilson Center, 'Regulating Artificial Intelligence in Africa: Strategies and Insights from Kenya, Ghana, and the African Union' (18 September 2024) <https://www.wilsoncenter.org/blog-post/regulating-artificial-intelligence-africa-strategies-and-insights-kenya-ghana-and-african> accessed 21 June 2025.
[81] MIT Technology Review, 'Africa's Push to Regulate AI Starts Now' (15 March 2024) <https://www.technologyreview.com/2024/03/15/1089844/africa-ai-artificial-intelligence-regulation-au-policy/> accessed 21 June 2025.
[82] The Conversation, 'AI Policies in Africa: Lessons from Ghana and Rwanda' (2024) <https://theconversation.com/ai-policies-in-africa-lessons-from-ghana-and-rwanda-253642> accessed 21 June 2025.

These examples highlight the fragmentation of AI governance across Africa and underscore the need for regional cooperation and harmonized standards, as envisioned in the African Union's Continental AI Strategy[83].

6.4 Global South Perspectives: Inclusive and Contextual Governance

Voices from the Global South have increasingly emphasized the importance of inclusive AI governance that reflects local realities and development priorities. Scholars and policymakers argue that dominant AI narratives, often shaped by Global North institutions, fail to account for the socio-economic inequalities, digital labor exploitation, and environmental vulnerabilities faced by developing countries.[84]

At the 2024 Internet Governance Forum, experts from Latin America, Africa, and South Asia called for region-specific frameworks, reparative algorithmic assessments, and cross-border cooperation to ensure that AI serves as a tool for empowerment rather than marginalization[85]. These perspectives advocate for bottom-up governance models, where civil society, indigenous communities, and marginalized groups have a voice in shaping AI policies.

7. The Case for a Rights-Based and Inclusive AI Governance Framework in Nigeria

As Nigeria advances its adoption of AI, the development of a rights-based and inclusive governance framework becomes critical. AI systems must be ethically compliant, prioritize protection of and respect for human rights, and promote inclusive development, aligned with democratic accountability and the SDGs. This section harmonizes existing legal and institutional frameworks with normative principles and international best practices to propose a comprehensive model for Nigeria.

7.1 Ethical Principles and Legal Foundations

There is a pressing need for sector-specific AI legislation grounded in ethical principles, fairness, transparency, accountability, and respect for human rights. Such legislation should mandate algorithmic impact assessments, especially for high-risk AI systems, and establish liability regimes for autonomous harms. These ethical imperatives draw inspiration from global standards, including the EU AI Act and UNESCO's Recommendation on the Ethics of Artificial Intelligence, both of which emphasize risk-based regulation, transparency, and human oversight.[86]The NAIS outline ethical AI development, but without binding legal authority, these remain aspirational documents.

7.2 Institutional Architecture and Multi-Stakeholder Governance

Nigeria's AI governance institutional framework includes bodies such as the NITDA which leads digital innovation policy, and the NCAIR which promotes AI research and capacity-building. Additionally, the NDPC enforces data governance, while sectoral regulators like the CBN and NCC provide targeted oversight in finance and telecommunications, respectively.[87]However, effective governance demands more participatory structures. An AI Ethics Commission with guaranteed independence, inclusivity, and enforcement powers is needed. Establishing multi-stakeholder

[83] White & Case LLP, 'AI Watch: Global Regulatory Tracker – African Union' (2024) <https://www.whitecase.com/insight-our-thinking/ai-watch-global-regulatory-tracker-african-union> accessed 21 June 2025.
[84] Brookings Institution, 'AI in the Global South: Opportunities and Challenges Towards More Inclusive Governance' (1 November 2023) <https://www.brookings.edu/articles/ai-in-the-global-south-opportunities-and-challenges-towards-more-inclusive-governance/> accessed 21 June 2025.
[85] Digital Watch Observatory, 'Inclusive AI Governance: Perspectives from the Global South' (18 December 2024) <https://dig.watch/updates/inclusive-ai-governance-perspectives-from-the-global-south> accessed 21 June 2025.
[86] Brent Mittelstadt, 'Principles Alone Cannot Guarantee Ethical AI' (2019) 1 *Nature Machine Intelligence* 501.
[87] International Comparative Legal Guides, 'Data Protection Laws and Regulations Nigeria 2024–2025' (ICLG, 31 July 2024) <https://iclg.com/practice-areas/data-protection-laws-and-regulations/nigeria> accessed 21 June 2025.

platforms, involving government, private sector, academia, civil society, and marginalized communities, can ensure inclusive governance, enable public consultations, and foster trust.[88]

7.3 Transparency, Accountability, and Explainability Mechanisms

Transparency and explainability are foundational to ethical AI. Nigeria must mandate that public-sector AI systems are auditable, explainable, and subject to human oversight.[89] This includes disclosing algorithms' decision logic, training datasets, and potential risks. Regulators like the NDPC should be empowered to conduct audits, publish impact assessments, and enforce penalties for violations of AI-related ethical standards.[90]Public institutions deploying AI should also be legally required to release annual transparency reports on their use of algorithmic tools, detailing objectives, risks, and mitigation measures. These obligations align with international models like Canada's Directive on Automated Decision-Making and the EU's proposed transparency mandates.[91]

7.4 Human Rights Impact Assessments and Due Diligence

Human rights must be central to AI governance. Nigeria should institutionalize Human Rights Impact Assessments (HRIAs) for AI applications, particularly in sensitive areas such as healthcare, social welfare, law enforcement, and education. HRIAs should evaluate impacts on privacy, equality, access to services, and due process.[92]Furthermore, AI developers and deployers should be mandated to conduct human rights due diligence, in line with the UN Guiding Principles on Business and Human Rights. The NHRC has emphasized the importance of engaging civil society and promoting remedies for rights violations linked to AI systems.[93]

7.5 Legal and Policy Reform for Inclusive AI

Nigeria must enact comprehensive AI legislation to address the socio-technical complexities of algorithmic governance. Such legislation should harmonize with existing instruments like the NDPA, while introducing AI-specific provisions for fairness, algorithmic accountability, and ethical oversight. Legal reforms should include the establishment of an independent AI oversight authority to evaluate system risks, advise policymakers, and resolve disputes.In parallel, policy frameworks should embed the SDGs in AI strategy, ensuring that AI contributes positively to goals like quality education, health, poverty alleviation, and environmental sustainability.

7.6 Capacity-Building and Digital Literacy

A rights-based AI framework must prioritize digital literacy and capacity-building. Government-led public education campaigns, school curriculum reforms, and community-based training programs are essential to empower Nigerians with the knowledge to understand and challenge AI systems that affect them. Targeted training must also be directed at regulators, judges, lawyers, and policymakers, equipping them to interpret, audit, and adjudicate AI-related cases with technical and ethical competence.

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[88] K Korir, 'The Role of Civil Society in AI Governance' (2014) <https://medium.com/@kiplangatkorir/the-role-of-civil-society-in-ai-governance-30138dcc916c> accessed 21 June 2025.

[89] S Wachter, B Mittelstadt and L Floridi, 'Why a Right to Explanation of Automated Decision-Making Does Not Exist in the GDPR' (2017) 7(2) *International Data Privacy Law* 76–99.

[90] Nigeria Data Protection Act 2023, ss 4–5.

[91] Treasury Board of Canada Secretariat, Directive on Automated Decision-Making (2019) <https://www.canada.ca/en/government/system/digital-government/digital-government-innovations/automated-decision-making.html> accessed 21 June 2025.

[92] D Nwosu and E Onuegbu, 'Human Rights Dimensions of Artificial Intelligence and Governance in Nigeria' (UN Working Group on Business and Human Rights, 2025) <https://www.ohchr.org/sites/default/files/documents/issues/business/workinggroupbusiness/wg-business-cfis/2025/subm-use-artificial-intelligence-priv-sect-international-ne2rk-corporate-soci-lity.pdf> accessed 21 June 2025.

[93] UN Human Rights Council, 'The Promotion, Protection and Enjoyment of Human Rights on the Internet' (A/HRC/32/L.20, 2016).

7.7 International Best Practices and Nigeria's Global Role

Nigeria can draw critical lessons from international AI governance models, such as the EU AI Act's risk-based classification and transparency obligations, and Canada's emphasis on algorithmic fairness and public engagement.[94] Regional and global cooperation with organizations like the UNESCO, African Union, and OECD can support the harmonization of AI governance standards and accelerate Nigeria's emergence as a regional leader in rights-based AI development.

8. Conclusion

The integration of AI into Nigeria's and governance systems presents a defining opportunity to accelerate progress towards sustainable development. However, this promise is tempered by pressing risks, ranging from algorithmic discrimination to regulatory gaps, that require urgent and proactive intervention. This study has examined Nigeria's evolving AI landscape through the dual lens of sustainable development and human rights, revealing a patchwork of legal instruments and institutional efforts that, while promising, remain insufficient for the ethical and inclusive governance of AI. While the launch of the NAIS illustrates a strong policy-level commitment, Nigeria's AI ecosystem still suffers from a lack of enforceable legislation, weak enforcement capacity, exclusion of marginalized voices, and inadequate infrastructure. Comparisons with the European Union's AI Act and UNESCO's AI Ethics Recommendation underscore the importance of embedding rights-based, risk-sensitive, and multi-stakeholder approaches into AI regulation. Regional models from South Africa, Kenya, and Ghana offer lessons in capacity-building, public-private collaboration, and contextual innovation, while global south perspectives call for decolonized and inclusive digital governance. AI is a tool for facilitating sustainable development, but if not properly attuned, it can mar sustainable development in Nigeria.

[94] Alliance Law Firm, 'Artificial Intelligence (AI) Systems Use in Nigeria: Charting the Course for AI Policy Development' (Lexology, 27 October 2023) <https://www.lexology.com/library/detail.aspx?g=600a8ee0-5b28-44da-8415-0e07c7f333fe> accessed 23 May 2025.