



TAXATION OF THE BLUE ECONOMY IN NIGERIA AND A QUEST FOR ECONOMIC RENAISSANCE

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Abstract

The blue economy, comprising ocean-based sectors such as shipping, fisheries, offshore energy, coastal tourism, and marine biotechnology, has emerged as a vital frontier for economic diversification and sustainable development in Nigeria. As the fiscal demands of governance grow, exploring viable avenues for revenue generation through taxation of these maritime industries has become imperative. Taxation, long recognized as the lifeblood of state financing, must evolve to accommodate the dynamic realities of Nigeria's territorial waters and exclusive economic zones. This study critically assesses the viability of implementing an efficient, equitable, and sustainable tax framework within Nigeria's blue economy. It interrogates the extent to which current legal structures, institutional mechanisms, and administrative capacities are equipped to support the taxation of blue economy activities. The research adopts a doctrinal methodology, drawing upon primary legal instruments, including the Constitution of the Federal Republic of Nigeria 1999 (as amended), the Federal Inland Revenue Service (Establishment) Act, the Nigerian Maritime Administration and Safety Agency Act, and applicable tax legislation - alongside judicial decisions and international best practices. Secondary sources such as scholarly textbooks, journal articles, and policy reports were also consulted. The findings reveal significant legal and institutional gaps, including overlapping regulatory mandates, absence of sector-specific tax provisions, and poor inter-agency coordination, which collectively undermine the fiscal potential of the blue economy. While recent efforts under Nigeria's Medium-Term Revenue Strategy signal a shift towards non-oil revenue mobilization, the lack of a harmonized, targeted framework for maritime taxation remains a critical bottleneck. The paper concludes with concrete recommendations for legal reform, improved institutional synergy, and stakeholder-inclusive policies to ensure the blue economy becomes a sustainable and tax-yielding pillar of national development.

1.0 Introduction

The concept of the blue economy, a term that encompasses the sustainable use of ocean resources for economic growth, improved livelihoods, and job creation, while ensuring environmental sustainability, has gained significant global attention in recent years.¹ Oceans and seas, which cover more than 70% of the Earth's surface, offer vast economic opportunities and resources, ranging from fisheries and aquaculture to renewable energy, marine biotechnology, and tourism. In Nigeria, the blue economy covers activities directly linked to our coastal and marine resources. These activities span ocean-based sectors such as offshore oil and gas, fisheries, shipping, tourism, and ocean energy, while also encompassing ocean-related industries like seafood processing, marine biotechnology, and more.² However, the effective realization of these opportunities hinges on the creation of a robust legal and fiscal framework, including taxation, to regulate and incentivize sustainable practices in the sector.

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¹IO Elegbede *et al*, 'Blue Economy (Sustainability)'

<https://www.researchgate.net/publication/371514936_Blue_Economy_Sustainability/link/648918cc9605ba270e435b07/download?tp=eyJjb250ZXh0Ijp7InBhZ2UiOiJwdWJsaWNhdGlvbiIsInByZXZpb3VzUGFnZSI6bnVsbH19> accessed 12th November, 2024

²F. D. Dare, 'Blue Economy and Sustainable Development: Empirical Evidence From Nigerian Environment'

<[file:///C:/Users/DELL%20LATITUDE/Downloads/F.+D.+DARE%20\(1\).pdf](file:///C:/Users/DELL%20LATITUDE/Downloads/F.+D.+DARE%20(1).pdf)> accessed 12th November, 2024



Taxation on the other hand, is a means by which the government generates its income which they use in the provision of basic amenities for the citizens and in financing its expenses.³The government needs considerable revenue to perform its duties and obligations to the citizenry. In this regard, payment of taxes is a mandatory obligation on the part of the citizens as the citizens and residents must declare their income honestly to the taxing authorities.⁴ Taxation plays a dual role in regulating economic activities and generating revenue for public expenditure. Within the context of the blue economy, taxation has the potential to serve as a transformative tool for achieving sustainable development. It can incentivize compliance with environmental standards, discourage exploitative practices, and mobilize resources for marine ecosystem conservation.⁵ By providing the government with revenue to fund infrastructure, social services, and environmental conservation efforts, a well-designed taxation regime can create a balance between economic exploitation and ecological preservation.⁶ Nigeria, as a country heavily reliant on crude oil exports, has faced numerous economic challenges, including fluctuating oil prices and dwindling foreign exchange reserves, underscoring the urgency of diversifying its revenue streams. The blue economy, if adequately taxed and managed, offers an alternative pathway to economic resilience and sustainability.⁷

Despite the promising potential of the blue economy, Nigeria's fiscal and regulatory approach to this sector remains underdeveloped.⁸ Current tax laws and policies do not comprehensively address the peculiarities of the blue economy, leading to significant gaps in revenue mobilization and enforcement. For instance, issues related to maritime taxation, fisheries levies, offshore energy production, and environmental protection charges remain inadequately addressed within the existing tax regime.⁹ These gaps hinder the sector's ability to contribute optimally to national development while ensuring environmental sustainability.

The taxation of the blue economy in Nigeria is a broad issue that intersects with economic, environmental, and legal dimensions. Addressing this topic requires an in-depth exploration of Nigeria's existing tax laws, an assessment of their applicability to blue economy activities, and a consideration of international best practices. This appraisal, therefore, seeks to provide a scholarly contribution to the discourse on sustainable economic development in Nigeria, emphasizing the critical role of taxation in unlocking the potential of the blue economy while safeguarding the nation's marine ecosystems.

2.1 Conceptual Framework

2.1.1 Blue Economy

The concept of the blue economy, an economic framework, focuses on the sustainable utilization, protection, and restoration of marine environments.¹⁰ While its interpretation may vary across organizations, it is broadly applied within the context of international development to promote sustainable practices in managing coastal and oceanic resources. The term encompasses a diverse range of economic

³MN Umenweke, *Tax Law and its Implications for Foreign Investments in Nigeria* (Enugu Nigeria: Nolix Education Publication, 2008) p 5.

⁴ Constitution of the Federal Republic of Nigeria 1999 (Third Alteration) Act, 2010, section 24 (f)

⁵ M Keen, 'Taxation and the environment: an overview of key issues for developing countries' <<https://ferdi.fr/dl/df-kg6okxyJB2PFfrxT2HJzuxRt/booklet-taxation-and-the-environment-an-overview-of-key-issues-for.pdf>> accessed 15th September, 2024

⁶ MC Anyaehie and A Areji, "Economic Diversification for Sustainable Development in Nigeria", *Open Journal of Political Science* (2015) 5(2), 87-94.

⁷ MC Anyaehie and A Areji, "Economic Diversification for Sustainable Development in Nigeria", *Open Journal of Political Science* (2015) 5(2), 87-94.

⁸ M. N. Umenweke and K. J. Bielu, 'The Introduction of The Blue Economy and Its Implications on the Nigerian Tax Regime' *International Journal of Comparative Law and Legal Philosophy (IJOCLLEP)* (2024) 6 (1), 69-74

⁹ *Ibid*

¹⁰ M Vierros, 'World Bank and United Nations Department of Economic and Social Affairs, 'The Potential of the Blue Economy: Increasing Long-term Benefits of the Sustainable Use of Marine Resources for Small Island Developing States and Coastal Least Developed Countries' <<https://documents.worldbank.org/en/publication/documents-reports/documentdetail/523151496389684076/the-potential-of-the-blue-economy-increasing-long-term-benefits-of-the-sustainable-use-of-marine-resources-for-small-island-developing-states-and-coastal-least-developed-countries>> accessed 19th November, 2024.



activities, spanning traditional sectors such as fisheries, aquaculture, maritime transportation, and coastal or marine tourism, alongside emerging industries like coastal renewable energy, marine ecosystem services (e.g., blue carbon), seabed mining, and bioprospecting.¹¹

The World Bank,¹² defined the blue economy as the "sustainable use of ocean resources for economic growth, improved livelihoods, and jobs while preserving the health of ocean ecosystem." According to the European Commission, Blue economy is "All economic activities related to oceans, seas and coasts. It covers a wide range of interlinked established and emerging sectors."¹³The Commonwealth of Nations considers it "an emerging concept which encourages better stewardship of our ocean or 'blue' resources."¹⁴Furthermore, Conservation International stated that blue economy also includes economic benefits that may not be marketed, such as carbon storage, coastal protection, cultural values and biodiversity.¹⁵ According to the Center for the Blue Economy, blue economy is now a widely used term around the world with three related but distinct meanings- the overall contribution of the oceans to economies, the need to address the environmental and ecological sustainability of the oceans, and the ocean economy as a growth opportunity for both developed and developing countries.¹⁶A United Nations representative recently characterized the Blue Economy as encompassing a variety of economic sectors and associated policies that collectively determine the sustainability of ocean resource utilization. A key challenge lies in understanding and managing multiple aspects of oceanic sustainability, including sustainable fisheries, ecosystem health, and pollution prevention. Additionally, the Blue Economy emphasizes the need for cross-border and cross-sector collaboration through innovative partnerships on an unprecedented scale. This is particularly daunting for Small Island Developing States (SIDS) and Least Developed Countries (LDCs), which face considerable constraints. The UN highlights that advancing the Blue Economy is instrumental in achieving the Sustainable Development Goals, especially Goal 14, which focuses on "life below water."

World Wildlife Fund (WWF) begins its report¹⁷ Principles for a Sustainable BLUE ECONOMY with two senses given to this term: "For some, blue economy means the use of the sea and its resources for sustainable economic development. For others, it simply refers to any economic activity in the maritime sector, whether sustainable or not."As the WWF reveals in its purpose of the report, there is still no widely accepted definition of the term blue economy despite increasing high-level adoption of it as a concept and as a goal of policy-making and investment.¹⁸According to the Organisation for Economic Co-operation and Development (OECD), the blue economy, which includes all industries with a direct or indirect connection to the ocean, such as marine energy, ports, shipping, coastal protection, and seafood production, could outperform global economic growth by

¹¹*Ibid*

¹²World Bank, "What is the Blue Economy?" <<https://www.worldbank.org/en/news/infographic/2017/06/06/blue-economy>> accessed 19th November, 2024.

¹³ European Union, "The 2018 Annual Economic Report on EU Blue Economy" <<https://op.europa.eu/en/publication-detail/-/publication/79299d10-8a35-11e8-ac6a-01aa75ed71a1>> accessed 19th November, 2024.

¹⁴ The Commonwealth, 'Sustainability must remain the heart of the blue economy: Commonwealth' <<https://thecommonwealth.org/news/sustainability-must-remain-heart-blue-economy-commonwealth>> accessed 19th November, 2024.

¹⁵B Sophie "What on Earth is the 'blue economy'?" <https://www.conservation.org/blog/what-on-earth-is-the-blue-economy/?gclid=Cj0KCQjwI9zdBRDgARIsAL5Nyn3xGXHsApcgFjjO6CvN0Zg602NYYuJw2LPvqa_nDpKKxPtNDJWQxLYaAvSLEALw_wcB> accessed 20th November, 2024.

¹⁶ Middlebury Institute of International Studies at Monterey, "Our History and Methodology" <<https://www.middlebury.edu/institute/academics/centers-initiatives/center-blue-economy/about/history>> accessed 20th November, 2024.

¹⁷ WWF, 'Principles for a Sustainable Blue Economy' <https://d2ouvy59p0dg6k.cloudfront.net/downloads/15_1471_blue_economy_6_pages_final.pdf> accessed 20th November, 2024.

¹⁸*Ibid*



2030.¹⁹ On top of the traditional ocean activities such as fisheries, tourism and maritime transport, blue economy entails emerging industries including renewable energy, aquaculture, seabed extractive activities and marine biotechnology and bioprospecting. Blue economy also attempts to embrace ocean ecosystem services that are not captured by the market but provide significant contribution to economic and human activity. They include carbon sequestration, coastal protection, waste disposal, and the existence of biodiversity.²⁰ The 2015 WWF briefing puts the value of key ocean assets over US\$24 trillion.²¹ Fisheries are now overexploited, but there is still plenty of room for aquaculture and offshore wind power. Aquaculture is the fastest growing food sector with the supply of 58 percent of fish to global markets. Aquaculture is vital to food security of the poorest countries especially.

Sectors that can be found under the blue economy

Sectors that can be found under blue economy include, Aquaculture (fish farms, but also algaculture); Ocean conservation; Maritime biotechnology; Bioprospecting; Fishing; Desalination; Maritime transport; Coastal, marine and maritime tourism (Blue Tourism); Mineral resources; Offshore oil and gas; Offshore wind power (also tidal and wave); Shipbuilding and Ship repair; Carbon sequestration; Coastal protection; Waste disposal; Existence of biodiversity; Ocean development; Responsible Tourism; Transportation, Infrastructure, and Trade; Biotechnology and Pharmaceuticals.

2.1.1.1 Development of the Concept of Blue Economy

The concept of the "blue economy" emerged during the Rio+20 United Nations Conference on Sustainable Development, held in Rio de Janeiro in June 2012.²² This landmark conference tackled two pivotal themes: the refinement of the Institutional Framework for Sustainable Development and the progression of the "green economy" as a mechanism to achieve poverty eradication and sustainable development.²³ While the primary outcome reaffirmed the centrality of poverty alleviation, the conference also underscored the green economy as a strategic pathway to achieving global sustainability goals.²⁴ Within this context, the blue economy concept gained prominence, positioning the oceans as central to an alternative economic model that balances ecological preservation with economic growth. During the Rio+20 preparatory discussions, nations with significant coastlines voiced concerns about the applicability of the green economy to their unique circumstances.²⁵ Strong advocacy for a blue economy framework emerged, emphasizing a tailored approach that reflects the significance of marine resources to coastal nations.²⁶ Oceans, which constitute over 95% of the biosphere and cover a vast portion of the earth's surface, represent a critical frontier for humanity's sustainable development endeavors.²⁷ These waters are not only integral to global food security and livelihoods but also underpin critical industries such as tourism, maritime trade, and emerging blue energy sectors.

¹⁹ OECD, 'The Blue Economy in Cities and Regions' <https://www.oecd.org/en/publications/the-blue-economy-in-cities-and-regions_bd929b7d-en.html> accessed 20th November, 2024.

²⁰ World Bank, "What is the Blue Economy?" <<https://www.worldbank.org/en/news/infographic/2017/06/06/blue-economy>> accessed 20th November, 2024.

²¹ WWF, 'What a 'blue economy' really is – WWF's perspective' <https://wwf.panda.org/wwf_news/?249111/What-a-blue-economy-really-is#:~:text=The%202015%20briefing%20puts%20the,the%20world's%20seventh%20largest%20economy.> accessed 20th November, 2024.

²² Commonwealth of Learning, 'The Blue Economy: Origin and concept' <<https://www.col.org/news/the-blue-economy-origin-and-concept/>> accessed 21st November, 2024.

²³ *Ibid.*

²⁴ *Ibid.*

²⁵ Commonwealth of Learning, 'The Blue Economy: Origin and concept' <<https://www.col.org/news/the-blue-economy-origin-and-concept/>> accessed 21st November, 2024.

²⁶ *Ibid.*

²⁷ United Nations, 'Goal 14: Conserve and sustainably use the oceans, seas and marine resources' <<https://www.un.org/sustainabledevelopment/oceans/>> accessed 21st November, 2024.



The blue economy goes beyond mere resource exploitation, redefining the oceans as dynamic development spaces. Through spatial planning, it integrates conservation, sustainable resource use, marine transport, bio-prospecting, renewable energy production, and mineral extraction.²⁸ The marine and coastal environments are indispensable to global tourism, offering resources for both traditional and eco-tourism ventures, while seabed hydrocarbons and advancing technologies unlock new opportunities in marine resource development.²⁹ Renewable energy from wind, wave, tidal, thermal, and biomass sources further underscores the oceans' potential to contribute to sustainable development.³⁰ However, realizing these opportunities is contingent on maintaining and restoring ocean ecosystems to a healthy and productive state.

Notably, the blue economy concept has been championed by the developing world, with Small Island Developing States (SIDS) taking the lead.³¹ While SIDS have historically depended on the seas for their livelihoods, the blue economy broadens this reliance into a framework of economic and spatial planning that balances sustainable development with equitable access to marine resources. It underscores the importance of integrating conservation into economic decision-making processes, reframing the oceans as more than sites for resource extraction or waste disposal.³² Instead, the blue economy consolidates oceanic values and services into economic models that address critical issues such as equity in resource access, sustainable development, and the alleviation of national debt through reinvestment in human capital.

In alignment with the green economy principles outlined at Rio+20, the blue economy seeks to improve human well-being and social equity while reducing environmental risks and ecological scarcities.³³ However, it is uniquely tailored to the context of developing nations, emphasizing low-carbon practices, resource efficiency, and social inclusion. Central to its philosophy is the principle of equity, ensuring that developing countries optimize benefits from marine resource exploitation such as fishery agreements, bio-prospecting, and mineral extraction while promoting national and gender equity, creating inclusive growth, and generating decent jobs.³⁴ Furthermore, the blue economy framework advocates for the refinement of international governance mechanisms to ensure that the interests of developing nations, especially those neighboring seabed development, are adequately addressed. The sustainable development and protection of ocean resources are increasingly recognized as vital to the future of SIDS and other coastal nations.³⁵ The blue economy thus emerges as a comprehensive and inclusive framework for addressing global challenges, fostering sustainable development, and ensuring equitable distribution of marine resource benefits, all while preserving the ecological integrity of the world's oceans.

2.1.1.2 Principles of Blue Economy

The blue economy is built upon three core and interconnected principles, economic sustainability,

²⁸ Commonwealth of Learning, 'The Blue Economy: Origin and concept' <<https://www.col.org/news/the-blue-economy-origin-and-concept/>> accessed 21st November, 2024

²⁹ SS Whipps, 'Advancing Action Towards Sustainable Coastal and Marine Tourism' <https://oceanpanel.org/wp-content/uploads/2023/03/WRI_Tourism_Booklet_Web_v3-1.pdf> accessed 21st November, 2024

³⁰ DO Obada *et al.*, 'A review of renewable energy resources in Nigeria for climate change mitigation' *Case Studies in Chemical and Environmental Engineering* (2024) 9(1) <<https://www.sciencedirect.com/science/article/pii/S266601642400063X>> accessed 21st November, 2024.

³¹ UNDP, 'The blue economy: A historic opportunity for SIDS' <<https://www.undp.org/blog/blue-economy-historic-opportunity-sids>> accessed 21st November, 2024.

³² LM Fusco *et al.*, 'Blueing business as usual in the ocean: Blue economies, oil, and climate justice' *Political Geography* (2022) 98(1), <<https://www.sciencedirect.com/science/article/pii/S0962629822000841>> accessed 21st November, 2024.

³³ Commonwealth of Learning, 'The Blue Economy: Origin and concept' <<https://www.col.org/news/the-blue-economy-origin-and-concept/>> accessed 21st November, 2024.

³⁴ J Das, 'Blue Economy, Blue Growth, Social Equity and Small-scale Fisheries: A Global and National Level Review' *Studies in Social Science Research* (2023) 4(1), 38-82.

³⁵ United Nations, 'Goal 14: Conserve and sustainably use the oceans, seas and marine resources' <<https://www.un.org/sustainabledevelopment/oceans/>> accessed 21st November, 2024.



environmental sustainability, and social equity. These principles provide the framework for developing marine resources in a way that ensures long-term benefits for humanity and the planet.

a. Economic Sustainability

Economic sustainability within the blue economy underscores the imperative to derive long-term economic benefits from marine resources while safeguarding them from depletion and overexploitation.³⁶ This principle advocates for the diversification of marine-based industries, shifting beyond traditional sectors like fisheries and oil extraction to embrace innovative fields such as renewable ocean energy, marine biotechnology, precision aquaculture, and sustainable tourism. By fostering advancements in blue innovation, including offshore energy solutions, marine robotics, and algae-based biofuels, economic sustainability aims to build resilient economies that are adaptive to global challenges such as climate change and resource scarcity.³⁷ It also seeks to minimize dependency on finite resources, offering countries like Nigeria an opportunity to reposition their economies by leveraging the untapped potential of oceanic wealth. Blue economy initiatives emphasize the need for robust institutional frameworks, public-private partnerships, and investments in marine technology to ensure the economic stability of ocean-based sectors.

b. Environmental Sustainability

At the heart of the blue economy lies environmental sustainability, recognizing that the health of marine ecosystems is non-negotiable for sustaining life on Earth.³⁸ This principle prioritizes the protection of biodiversity, pollution reduction, and climate change mitigation, recognizing that healthy oceans are indispensable for carbon sequestration, climate regulation, and ecological balance. Key strategies under this pillar include:

- **Establishing Marine Protected Areas (MPAs):** These zones conserve marine biodiversity and protect endangered species, ensuring the regeneration of overexploited fish stocks.³⁹
- **Sustainable fishing practices:** These minimize bycatch and overfishing, allowing marine populations to replenish naturally.⁴⁰
- **Rehabilitation of critical habitats:** Efforts to restore mangroves, coral reefs, and seagrass beds not only bolster biodiversity but also enhance coastal protection against climate-induced disasters.⁴¹

Pollution reduction is equally integral, with targeted measures to combat plastic waste, oil spills, agricultural runoff, and untreated wastewater that degrade marine ecosystems.⁴² Furthermore, addressing the impacts of industrial shipping and offshore drilling is vital to preserving ocean health and ensuring that economic activities do not undermine the ecosystem services upon which they depend.

³⁶ IS Elegbede et al 'Blue Economy (Sustainability)' <<file:///C:/Users/DAVE/Downloads/BlueEconomy.pdf>> accessed 21st November, 2024.

³⁷ LA Pace, O Saritas and A Deidun, 'Exploring future research and innovation directions for a sustainable blue economy' *Marine Policy* (2023) 148(1) <<https://www.sciencedirect.com/science/article/pii/S0308597X22004808>> accessed 21st November, 2024.

³⁸ United Nations, 'Citing Economic, Environmental Benefits of Using Ocean Resources Wisely, Member States Spotlight Ambitious Actions to Create Blue Economy, as Lisbon Conference Continues' <<https://press.un.org/en/2022/sea2148.doc.htm>> accessed 22st November, 2024.

³⁹ E Hoyt, 'Marine Protected Areas' <<https://www.sciencedirect.com/topics/agricultural-and-biological-sciences/marine-protected-area#:~:text=MPAs%20have%20been%20set%20up,invertebrate%20populations%20around%20a%20reserve.>> accessed 22st November, 2024.

⁴⁰ National Geographic, 'Sustainable Fishing' <<https://education.nationalgeographic.org/resource/sustainable-fishing/>> accessed 22st November, 2024.

⁴¹ Food and Agriculture Organization, 'Habitat rehabilitation for inland fisheries: Global review' <<https://www.fao.org/4/a0039e/a0039e04.htm>> accessed 22st November, 2024.

⁴² World Bank Group, 'Marine Pollution in the Caribbean: Not a Minute to Waste' <<https://documents1.worldbank.org/curated/en/482391554225185720/pdf/Marine-Pollution-in-the-Caribbean-Not-a-Minute-to-Waste.pdf>> accessed 22st November, 2024.



c. Social Equity

The principle of social equity in the blue economy reflects a commitment to inclusivity, ensuring that the economic benefits of marine resources are distributed equitably, especially to marginalized and coastal communities. Coastal populations in developing countries, particularly Small Island Developing States (SIDS) and other vulnerable regions, are disproportionately reliant on marine ecosystems for their livelihoods.⁴³ The blue economy seeks to protect traditional practices such as artisanal fishing while empowering these communities through education, skill-building, and access to modern tools. Social equity also extends to addressing systemic inequalities, including gender disparities.⁴⁴ Women, who play critical but often underappreciated roles in marine-based industries, must be integrated into decision-making processes and benefit-sharing mechanisms.⁴⁵ Ensuring transparency in resource allocation and revenue sharing is paramount, with governance frameworks designed to prevent exploitation and inequities.

Beyond economic redistribution, social equity emphasizes the protection of cultural heritage and the rights of indigenous peoples who have coexisted with marine environments for generations.⁴⁶ This principle advocates for policies that foster inclusive growth, creating opportunities for decent work while ensuring that the transition to sustainable ocean economies does not marginalize vulnerable groups. The principles of the blue economy are deeply intertwined, forming a cohesive framework where the success of one pillar reinforces the others. Economic gains are inherently tied to the health of ecosystems, as depleted or polluted oceans cannot sustain industries such as fishing, tourism, or renewable energy.⁴⁷ Similarly, environmental preservation is contingent upon addressing socio-economic inequalities that drive resource overexploitation, such as poverty and lack of access to sustainable livelihoods. Social equity bridges the gap, ensuring that the transition to a blue economy empowers vulnerable populations, promotes gender parity, and mitigates disparities in wealth and resource access.⁴⁸ By integrating these principles, the blue economy presents a transformative vision for achieving the United Nations Sustainable Development Goals (SDGs), particularly Goal 14: Life Below Water, which emphasizes the conservation and sustainable use of oceans and marine resources. The principles of the blue economy are not merely aspirational but pragmatic pathways toward addressing contemporary global challenges. They offer a balanced framework that ensures economic growth is synergized with environmental stewardship and social well-being, laying the foundation for a more equitable and sustainable world.

3.0 Assessing the viability of Taxation in Nigeria's Blue Economy

The proposition that the blue economy can and should be taxed in Nigeria is firmly grounded in economic principles, legal provisions, and global precedents. Nigeria's legal framework provides ample support for implementing taxes within its maritime domain. Specifically, Section 4 of the Constitution empowers the National Assembly to legislate on matters within the Exclusive Legislative List, which includes items such as shipping, navigation, and oil fields.⁴⁹ Consequently,

⁴³ United Nations, 'About Small Island Developing States' <<https://www.un.org/ohrlls/content/about-small-island-developing-states>> accessed 22st November, 2024.

⁴⁴ B Shang, 'Tackling Gender Inequality: Definitions, Trends, and Policy Designs' <<https://www.elibrary.imf.org/view/journals/001/2022/232/article-A001-en.xml>> accessed 22st November, 2024

⁴⁵ A Suresh, 'Addressing the Voice of Women in Marine and Maritime Industry' *Scientific Research Journal* (2020) 8(4), 52-55.

⁴⁶ E Perez-Alvaro, 'Indigenous rights and underwater cultural heritage: (de)constructing international conventions' *Maritime Studies* (2023) 22(3)

<https://www.researchgate.net/publication/371950177_Indigenous_rights_and_underwater_cultural_heritage_deconstructing_international_conventions> accessed 22st November, 2024.

⁴⁷ C Umeh, CI Umeh and EF Ogar, 'Economic Impacts of Marine Pollution in Nigeria and the Need for Sustainable Policy Interventions' *International Journal of Social Science Humanity and Management Research* (2024) 3(4), 441-449.

⁴⁸ HJ Niner *et al.*, 'Issues of context, capacity and scale: Essential conditions and missing links for a sustainable blue economy' *Environmental Science and Policy* (2022) 130(1), 25-35.

⁴⁹ Constitution of the Federal Republic of Nigeria, Section 4(2) and (3)



federal taxation regimes primarily govern offshore oil and gas activities, maritime transport, and port operations, while states have jurisdiction over activities within their territorial waters, such as artisanal fisheries and coastal tourism. The federal government has the authority to legislate and regulate activities within its territorial waters, contiguous zone, continental shelf, and Exclusive Economic Zone (EEZ).⁵⁰ Furthermore, sector-specific legislation, such as the Sea Fisheries Act 1992, Petroleum Industry Act (PIA) 2021, and the Nigerian Maritime Administration and Safety Agency (NIMASA) Act 2007, provides the legal foundation for imposing taxes and levies on activities related to marine resources. Notably, the fisheries sector in Nigeria holds immense economic importance, contributing significantly to the nation's GDP and serving as a critical source of employment and livelihood for millions.⁵¹ It also plays a pivotal role in ensuring food security by providing an affordable and accessible source of protein for the population. The Sea Fisheries Act provides a foundational regulatory framework, mandating licensing fees for fishing vessels operating in Nigerian waters.⁵² This legislation underscores the strategic value of the sector, both as a driver of economic activity and a provider of essential resources.

Beyond licensing fees, Nigeria's fisheries sector presents considerable potential for taxation to augment government revenue. The current framework⁵³ can be expanded to include taxes on catch volumes, export revenues, and the use of fishing gear. These taxation strategies are straightforward to implement and can capitalize on the sector's economic dynamics. For instance, levies based on catch volumes provide a direct linkage between fishing activity and fiscal contribution, ensuring that the industry contributes proportionately to national development. Similarly, taxes on export revenues align with the government's broader objectives of resource mobilization from high-value commodities.

Moreso, taxation in the fisheries sector is not merely a revenue-generating mechanism but also a tool for promoting sustainable fishing practices.⁵⁴ Catch-based taxes, for example, could incentivize compliance with quotas, encouraging fishers to operate within sustainable limits and mitigate overfishing. This approach ensures the long-term viability of marine ecosystems, which are critical for biodiversity and economic sustainability. Additionally, taxes on specific fishing gear can discourage the use of environmentally harmful practices, fostering a more responsible approach to resource exploitation.⁵⁵ Thus, a well-structured taxation framework can achieve a dual purpose: economic gain and environmental stewardship.

Offshore oil and gas operations are important to Nigeria's blue economy, serving as a significant revenue source and driver of economic growth.⁵⁶ The Petroleum Industry Act (PIA) has laid the groundwork for a structured taxation regime in this sector, encompassing royalties and hydrocarbon taxes.⁵⁷ While this dual taxation framework has provided a foundation for fiscal management, there remains significant potential for optimization to enhance both revenue generation and operational efficiency.

A tiered tax system that distinguishes between shallow-water and deep-water operations could offer a more comprehensive approach to taxation, reflecting the varying environmental and logistical

⁵⁰ R Anammah and L Ezenyimulu, 'The Regulatory Framework of the Nigerian Blue Economy'

<<https://www.aelx.com/regulatory-framework-of-the-nigerian-blue-economy/>> Assessed 15th January 2025.

⁵¹ KO Elezuo, MU Bello and NF Aladetohun, 'Harnessing the fisheries sector of the blue economy for sustainable economic growth and development in Nigeria: Opportunities, challenges, and strategies' *International Journal of Fisheries and Aquatic Studies* (2024) 12(5), 15-23.

⁵² Sea Fisheries Act 1992, Section 1.

⁵³ *Ibid.*

⁵⁴ EY Mohammed, D Steinbach and P Steele, 'Fiscal reforms for sustainable marine fisheries governance: Delivering the SDGs and ensuring no one is left behind' *Marine Policy*, 262-270.

⁵⁵ G Occhiali, 'What's the Catch? A Review of the Fiscal Treatments of Fisheries in Sub-Saharan Africa' *The Journal of Environment and Development* (2023) 32(2), 192-217.

⁵⁶ JN Osuji and J Agbakwuru, 'Ocean and Coastal Resources Components and their Contributions to Sustainable Development of Nigeria' *Journal of Applied Science* (2024) 28(1), 135- 146.

⁵⁷ Petroleum Act 2021, s260.



complexities of these activities. Shallow-water operations typically face less technical and financial challenges compared to the greater depths and harsher conditions of deep-water operations.⁵⁸ Tailoring tax rates to these distinctions can not only ensure a fairer system but also encourage investment in less-explored areas. Furthermore, extending taxes to ancillary services, such as offshore support vessels, pipeline networks, and other critical infrastructure, can broaden the tax base without significantly deterring private sector investment. Nigeria's geographical position along critical maritime trade routes has positioned its ports as some of the busiest in West Africa, serving as vital hubs for regional and international trade.⁵⁹ This dynamic maritime transport sector presents extensive opportunities for taxation through mechanisms such as port charges, shipping levies, and tariffs on imported and exported goods. These revenue streams are integral to the country's fiscal strategy, offering a robust foundation for economic growth if effectively managed. However, the full potential of these opportunities is undermined by systemic inefficiencies and corrupt practices, which contribute to significant revenue leakages.

Beyond revenue optimization, Nigeria has the opportunity to align its maritime sector with global decarbonization efforts by introducing environmental levies on shipping companies.⁶⁰ These levies would serve as an incentive for adopting cleaner fuel technologies, thereby reducing the environmental impact of maritime operations. Such measures would not only contribute to sustainable development but also position Nigeria as a leader in promoting green practices in the maritime industry. By balancing revenue generation with environmental stewardship, Nigeria can enhance the resilience and competitiveness of its maritime sector on the global stage.

Nigeria's coastal tourism remains an underdeveloped sector despite its immense potential to significantly contribute to the nation's economy.⁶¹ The country is blessed with a vast coastline stretching from the Atlantic-facing beaches of Lagos to the biodiversity-rich mangroves of the Niger Delta.⁶² These natural attractions offer a unique blend of pristine landscapes, cultural richness, and ecological significance, capable of drawing both domestic and international tourists. However, limited investment, poor infrastructure, and insufficient marketing have hindered the full realization of this sector's potential. With proper planning and strategic interventions, coastal tourism in Nigeria can become a cornerstone of the nation's economic diversification efforts, aligning with global trends that emphasize sustainable and nature-based tourism.

It is pertinent to note that taxation presents a strategic tool for monetizing Nigeria's coastal tourism sector while ensuring its sustainability.⁶³ By imposing occupancy taxes on hotels, levies on tour operators, and environmental fees for activities in protected coastal zones, the government can generate substantial revenue.⁶⁴ Such measures not only provide an avenue for income generation but also encourage responsible tourism practices. Environmental fees, for example, can deter harmful activities and promote eco-friendly alternatives, aligning with global standards for sustainable tourism.

⁵⁸ AH Ikevuje and others, 'Advanced materials and deepwater asset life cycle management: A strategic approach for enhancing offshore oil and gas operations' *Engineering Science & Technology Journal*. (2024) 5(7), 2186-2201.

⁵⁹ C Edmund, 'River Port and Deep-Sea Port Developments in Nigeria: Implications for West African Gateways and Hinterland Markets' *American Journal of Industrial and Business Management* (2022) 12(04), 531-561.

⁶⁰ International Maritime Organization, 'Nigeria International Maritime Summit' <<https://www.imo.org/en/MediaCentre/SecretaryGeneral/Pages/Nigeria-International-Maritime-Summit-.aspx>> Assessed 15th January 2025.

⁶¹ AH Oladele and others, 'Research Note Potentials of Coastal and Marine Tourism in Nigeria' *Tourism in Marine Environments* (2018) 13(2), 165-173.

⁶² AE Ogbeibu and BJ Oribhabor, 'The Niger Delta Mangrove Ecosystem and Its Conservation Challenges' <https://www.researchgate.net/publication/375856322_The_Niger_Delta_Mangrove_Ecosystem_and_Its_Conservation_Challenges> Assessed 15th January 2025.

⁶³ MN Umenweke, and KJ Bielu, 'The Introduction of the Blue Economy and Its Implications on the Nigerian Tax Regime' *International Journal of Comparative Law and Legal Philosophy* (2024) 6(1), 69-74.

⁶⁴ StudySmarter, 'Tourism Taxation: Economic Impact & Benefits' <<https://www.studysmarter.co.uk/explanations/hospitality-and-tourism/tourism-economics/tourism-taxation/>> Assessed 15th January 2025.



Moreover, these taxes can be tailored to balance affordability for tourists and profitability for operators, creating a win-win scenario what supports both economic growth and environmental conservation.

Technological advancements offer unparalleled opportunities to enhance the efficiency of blue economy taxation in Nigeria.⁶⁵ Satellite tracking systems can monitor fishing activities, ensuring accurate reporting and compliance.⁶⁶ Blockchain technology can be used to create transparent and tamper-proof records of maritime transactions,⁶⁷ reducing tax evasion. Digital platforms can automate tax collection processes, minimizing bureaucratic inefficiencies and corruption. For example, the use of digital tax stamps on fishery exports can ensure that all revenue-generating activities are appropriately taxed.

Taxing the blue economy extends beyond its immediate function of generating revenue; it is an essential mechanism for fostering inclusive development. The blue economy, which encompasses marine resources and activities such as fishing, shipping, and tourism, holds immense potential to drive sustainable growth.⁶⁸ However, without equitable redistribution, the economic benefits of this sector often bypass marginalized coastal communities that rely heavily on these resources. By channeling revenue derived from taxing maritime industries into infrastructure, healthcare, and education, governments can address historical inequities that have left these communities underserved. Such targeted investments not only uplift these populations but also lay a foundation for broader national development. Investing tax revenue from the blue economy into coastal communities ensures the benefits of marine resources are equitably distributed.⁶⁹ For decades, many of these communities have faced systemic neglect, with limited access to basic amenities and opportunities for economic growth. Revenue allocation towards modernizing infrastructure, improving healthcare services, and expanding educational access can significantly alter the socioeconomic landscape of these regions. These measures empower communities to actively participate in and benefit from the blue economy, reducing disparities and fostering a more inclusive economic framework that values and integrates their contributions. Beyond fostering development, taxation serves as a tool to formalize maritime activities, which in turn enhances governance and economic stability.⁷⁰ Formalization through taxation encourages compliance and accountability among stakeholders in the blue economy, thereby reducing the prevalence of illegal activities such as smuggling, unregulated fishing, and illicit maritime trade. These illegal practices not only undermine national security but also deplete valuable marine resources, threatening economic stability.

Critics often contend that taxation could serve as a disincentive to investment in the blue economy, a sector critical to sustainable development and economic diversification.⁷¹ The concern

⁶⁵ Dentons Acas-Law, 'The role of technology in Nigeria's blue economy' <<https://www.dentonsacaslaw.com/en/insights/articles/2024/march/12/role-of-technology-in-nigeria-blue-economy>> Assessed 15th January 2025.

⁶⁶ G Rowlands and other, 'Satellite surveillance of fishing vessel activity in the Ascension Island Exclusive Economic Zone and Marine Protected Area' <<https://www.sciencedirect.com/science/article/pii/S0308597X18303002>> Assessed 16th January 2025.

⁶⁷ MarineLink, 'Blockchain in Shipping: Revolutionizing Global Supply Chains' <<https://www.marinelink.com/articles/maritime/blockchain-in-shipping-revolutionizing-global-supply-chains-101643#:~:text=With%20its%20ability%20to%20provide.fraud%2C%20and%20lack%20of%20transparency.>> Assessed 16th January 2025.

⁶⁸ R Ahmed, 'Fostering Sustainable Growth through the Blue Economy: Balancing Prosperity and Marine Conservation' <https://www.researchgate.net/publication/383130499_Fostering_Sustainable_Growth_through_the_Blue_Economy_Balancing_Prosperty_and_Marine_Conservation> Assessed 16th January 2025.

⁶⁹ EY Mohammed, 'Ensuring Blue Economy is Not Just a Buzzword' <<https://worldfishcenter.org/blog/ensuring-blue-economy-not-just-buzzword>> Assessed 16th January 2025.

⁷⁰ MN Umenweke and KJ Bielu, 'The Introduction of The Blue Economy and Its Implications on The Nigerian Tax Regime' *International Journal of Comparative Law and Legal Philosophy* (2024) 6(1), 69-74.

⁷¹ G Nwaeze, 'The Role of Fiscal Incentives in Revitalizing the Nigerian Blue Economy' <https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4567524> Assessed 16th January 2025.



lies in the potential financial burden taxes might impose on businesses, particularly in emerging markets like Nigeria, where the blue economy is still in its nascent stages. Investors may be reluctant to commit resources to ventures perceived as being taxed heavily without adequate support, as this could reduce profitability and stifle innovation.⁷² Such fears, if unaddressed, may hinder the sector's growth and its ability to contribute meaningfully to the economy and environmental sustainability. However, this challenge can be effectively mitigated through a balanced approach that incorporates taxation alongside well-structured incentives. A particularly impactful incentive would be tax credits for companies investing in renewable marine energy, aligning their activities with Nigeria's commitments under the Paris Agreement. By offering such targeted incentives, the government can attract private investment in key areas such as offshore wind farms, wave energy, and sustainable aquaculture, ensuring that economic development proceeds in tandem with environmental conservation. This strategic approach would not only enhance the competitiveness of Nigeria's blue economy but also solidify its role in meeting global sustainability goals while ensuring that taxation remains a tool for growth rather than a barrier.

4.0 Challenges on the viability of the Taxation of the blue Economy in Nigeria

The taxation of the blue economy in Nigeria represents a complex challenge that intersects with economic policy, environmental management, and fiscal governance. Despite its immense potential to drive sustainable economic growth, enhance job creation, and diversify Nigeria's economy beyond oil dependency, the blue economy remains significantly underutilized. Central to this underutilization is the inadequacy of the country's tax frameworks, which fail to effectively address the unique complexities of this emerging sector.⁷³ This deficiency undermines Nigeria's ability to harness the full potential of its marine and aquatic resources while also limiting its capacity to meet global commitments on environmental sustainability and sustainable development. Nigeria's existing tax legislation, such as the Companies Income Tax Act (CITA), Value Added Tax Act (VATA), and Petroleum Profits Tax Act (PPTA), is designed primarily for traditional industries and does not account for the distinctive nature of blue economy activities.⁷⁴ For example, offshore renewable energy projects, marine biotechnology ventures, and sustainable aquaculture practices require tailored fiscal policies that balance incentives with revenue generation. The absence of such provisions creates gaps where businesses either face arbitrary tax burdens or escape taxation entirely due to legislative loopholes.⁷⁵ Consequently, this misalignment discourages foreign and domestic investments and limits innovation within the sector.

Globally, nations that have successfully developed their blue economies implement targeted tax incentives to encourage sustainable practices, such as tax breaks for renewable energy projects and reduced tariffs for eco-friendly shipping. However, Nigeria lacks similar initiatives. For instance, while offshore wind and solar projects are emerging globally as critical components of the blue economy, Nigerian fiscal policies have yet to create the enabling environment to attract investment in these areas.⁷⁶ This absence of incentives stifles the transition to environmentally sustainable practices, perpetuating reliance on exploitative activities such as overfishing and oil exploration, which

⁷² European Commission, 'Effectiveness of tax incentives for venture capital and business angels to foster the investment of SMEs and start-ups' <https://taxation-customs.ec.europa.eu/system/files/2017-06/final_report_2017_taxud_venture-capital_business-angels.pdf> Assessed 16th January 2025.

⁷³SA Odey, 'The Nigerian Blue Economy: Opportunities and Difficulties for Economic Development' *Jurnal Ilmu Sosiologi Dialektika Kontemporer* (2023) 11(2) <<https://ojs.unm.ac.id/elektikakontemporer/article/view/57725>> accessed 17th November, 2024.

⁷⁴ M N Umenweke and KJ Bielu, 'The Introduction of The Blue Economy and Its Implications on the Nigerian Tax Regime' *International Journal of Comparative Law and Legal Philosophy (IJOCLLEP)* (2024) 6 (1), 69-74

⁷⁵ *Ibid*

⁷⁶ Ministry of Budget and Economic Planning 'Nigeria Agenda 2050' <<https://nationalplanning.gov.ng/wp-content/uploads/2023/05/Nigeria-Agenda-2050-Report-Corrected.pdf>> accessed 18th November, 2024 <<https://nationalplanning.gov.ng/wp-content/uploads/2023/05/Nigeria-Agenda-2050-Report-Corrected.pdf>> accessed 18th November, 2024.



degrade marine ecosystems. Environmental externalities associated with the blue economy, such as marine pollution, overexploitation of fisheries, and biodiversity loss, remain largely unaddressed in Nigeria's taxation framework. Tools like carbon pricing, eco-compensation taxes, and pollution levies, which are critical for managing environmental risks, are either absent or poorly implemented.⁷⁷ This gap undermines Nigeria's ability to fulfill its commitments under international treaties like the United Nations Framework Convention on Climate Change (UNFCCC) and the Sustainable Development Goals (SDGs), specifically Goal 14, which focuses on conserving and sustainably using oceans, seas, and marine resources.

Nigeria's tax administration suffers from systemic weaknesses, including corruption, inadequate technical capacity, and overlapping jurisdictional mandates between federal and state agencies. These challenges are particularly pronounced in the blue economy, where activities such as offshore energy production and coastal tourism involve multiple regulatory bodies. This fragmentation results in inefficient tax collection, revenue leakages, and an uneven application of tax laws, further exacerbating investor uncertainty and reducing public confidence in the fiscal system.⁷⁸ In the global race to develop sustainable blue economies,

Nigeria lags behind some other coastal nations that have adopted comprehensive, transparent, and forward-looking tax regimes. Countries like Norway and Mauritius, for instance, have implemented robust taxation systems that not only generate significant revenue but also incentivize sustainable practices. The comparative weakness of Nigeria's fiscal framework limits its competitiveness on the international stage, discouraging foreign direct investment (FDI) and depriving the country of valuable economic partnerships and trade opportunities.⁷⁹

Without a robust regulatory and taxation framework, there is a growing risk that companies operating within Nigeria's blue economy will engage in greenwashing—adopting superficial sustainability measures to attract investment while failing to deliver tangible environmental or social benefits.⁸⁰ This issue is compounded by the lack of standardized ESG (Environmental, Social, and Governance) reporting requirements and enforcement mechanisms, which makes it difficult to hold companies accountable for genuine sustainable practices. The inadequacy of Nigeria's taxation regime for the blue economy has far-reaching socio-economic implications. Potential revenue that could be used to fund public infrastructure, education, and healthcare remains unrealized, while coastal communities continue to suffer from environmental degradation and limited economic opportunities. This disparity further entrenches inequality and undermines Nigeria's development goals.

5.0 Conclusion

Taxation within Nigeria's blue economy presents both a compelling opportunity and a significant policy challenge. At its core, the viability of such a regime depends not solely on the capacity to raise revenue, but on the broader question of whether Nigeria can craft a tax framework that aligns with the distinct realities of ocean-based industries. From maritime transport to coastal tourism, aquaculture to offshore energy exploration, the blue economy operates in a space that is dynamic, complex, and often beyond the reach of conventional tax structures. Presently, Nigeria's tax system remains largely land-centric, structured around industries and economic patterns that are terrestrial in nature. This misalignment has contributed to a regulatory vacuum in the maritime sector, where fragmented oversight, jurisdictional ambiguities, and outdated legal instruments continue to hinder efficient taxation. Without targeted reforms, the country risks not only under-taxing a crucial growth

⁷⁷ *Ibid*

⁷⁸ AB Akintola *et al*, "Tax Administration in Nigeria: Challenges and Prospects" *International Journal of Scientific Engineering and Applied Science (IJSEAS)* (2021) 7(8), 241-251.

⁷⁹ AELEX, 'Regulatory Framework of The Nigerian Blue Economy' <<https://www.aelix.com/regulatory-framework-of-the-nigerian-blue-economy/>> accessed 18th November, 2024.

⁸⁰ J Odinkonigbo and F Ehigiamusor, 'Greenwashing: Risks and the Law in Nigeria' <<https://www.templars-law.com/app/uploads/2023/09/Greenwashing-Risks-and-the-Law-in-Nigeria96.pdf>> accessed 18th November, 2024.



area but also stifling its development through over-regulation or institutional neglect. To move forward, Nigeria must develop a tax framework that is responsive, adaptive, and forward-looking. Such a regime must go beyond revenue mobilisation; it must incentivise compliance, encourage sustainability, and attract investment. This calls for more than just legal reform, it demands coordination between agencies, investment in data infrastructure, and a genuine commitment to good governance. Littoral states, coastal communities, and private sector actors must be part of this conversation, not just as taxpayers, but as stakeholders in shaping a system that works for all. There is no one-size-fits-all model here. Lessons can be drawn from international best practices, but Nigeria must ultimately tailor its approach to local conditions, capacities, and goals. With the right mix of policy clarity, institutional reform, and political will, the blue economy could become a cornerstone of Nigeria's economic future. But without these, it risks becoming just another promising frontier lost to poor planning and missed opportunities. The question is no longer about potential, it is about readiness.

6.0 Recommendations

i. Development of a Sector-Specific Tax Framework for the Blue Economy: The Federal Government, in collaboration with the Federal Inland Revenue Service (FIRS), Nigerian Maritime Administration and Safety Agency (NIMASA), and other relevant bodies, should formulate a distinct tax framework tailored to the diverse components of the blue economy. This framework must account for the peculiarities of maritime and ocean-based industries, while avoiding duplication of taxes and excessive regulatory burdens that could stifle growth and investment.

ii. Legislative Harmonisation and Reform: There is an urgent need to harmonise the various statutory provisions scattered across tax, maritime, and environmental laws. Critical legislative instruments—such as the Companies Income Tax Act (CITA), the Value Added Tax Act, the NIMASA Act, and the Petroleum Industry Act—should be reviewed to clarify jurisdictional overlaps, define taxable activities within the blue economy, and establish coherent taxation rules for both domestic and foreign entities operating in Nigerian waters.

iii. Institutional Capacity Building and Inter-Agency Coordination: A viable blue economy tax regime requires strong institutional capacity. This entails targeted training of FIRS officers and other maritime regulators on ocean economy taxation principles, environmental tax instruments, and international fiscal standards. Moreover, formalised inter-agency coordination mechanisms should be established to foster information sharing, prevent regulatory fragmentation, and ensure consistent enforcement.

iv. Introduction of Incentive-Based Taxation for Sustainability: Nigeria should adopt a sustainability-aligned taxation approach that incentivizes environmentally responsible practices within the blue economy. For instance, tax credits or rebates could be introduced for companies that invest in ocean conservation, renewable marine energy, or pollution control technologies. Such eco-fiscal instruments can align revenue objectives with environmental protection imperatives.

v. Stakeholder Engagement and Inclusive Policymaking-Coastal communities, indigenous operators, and private sector actors must be actively involved in the design and implementation of any blue economy taxation strategy. This inclusive approach would improve legitimacy, promote voluntary compliance, and reflect local realities, especially regarding artisanal fisheries, informal coastal trade, and marine cultural enterprises.

vi. Benchmarking Against International Best Practices- Nigeria should draw lessons from countries with established maritime tax regimes, such as Norway, Mauritius, and Singapore. Benchmarking policy models particularly in offshore tax administration, port duties, and sustainable ocean economy financing would provide valuable guidance for adapting tested frameworks to the Nigerian context.