

Nigeria

Food fortification

The *Food Grade (Table or Cooking) Salt Regulations 2021*¹⁰² mandate that all food-grade salt as an ingredient of food for direct use by consumers, in manufacture or as a carrier of food additives must be fortified with iodine at a level specified by the National Agency for Food and Drug Administration and Control (NAFDAC).

The *Food Fortification Regulations 2021*¹⁰³ mandate that sugar, wheat and maize flour, vegetable oil, and margarine and butter are fortified with vitamin A (to varying levels per kg); wheat flour, composite flour, maize flour, wheat semolina, and whole maize meal must be fortified with: vitamins A, B1, B2, B3, B6, B9, B12, iron and zinc. The Regulations also specify other foods to which vitamins, minerals, nutrients or other amino acids “may” be added, however, it lists both mandatory and voluntary fortification and applicable fortificants (e.g., enriched alimentary pasta must be fortified with thiamine, riboflavin, niacin, folic acid and iron, and can be voluntarily fortified with pantothenic acid, vitamin B6 and magnesium).

Further, the *2016 National Plan of Action on Food and Nutrition*¹⁰⁴ contains fortification actions including to enforce food fortification standards in regulated food products and promote research on local food fortification. The private sector is also expected to collaborate with the government in supporting the food and nutrition programme including via fortification of certain identified foods with mandatory micronutrients. In the *Agricultural Sector Food Security and Nutrition Strategy 2016 – 2025*¹⁰⁵ the Government of Nigeria has identified biofortification as a priority initiative to improve micronutrient deficiencies, mainstreaming nutrition into agriculture and specifying priority areas. The strategy highlights expanding biofortified staples to iron in beans, zinc rice, and vitamin A in plantain and bananas, among other staples, extending existing legislation on fortification to cover other important food staples, supporting multisectoral efforts to strengthen the food fortification regulatory environment and compliance, and comprehensive nutrition education on the benefits of consuming fortified foods as some priority areas.

Responsibilities and regulatory governance for nutrition labelling

NAFDAC, Advisory Council which comprises several government and industry representatives, is responsible for regulating and controlling food processes and labelling and advising the federal government on national policies on control and quality specifications of food. NAFDAC is also the Secretariat of Nigeria’s National Food Safety Management Committee (NFSMC) which addresses challenges within Nigeria’s Food Safety System such as the overlap of functions, poor co-ordination and communication among Nigeria’s food regulators, and inadequate private sector and consumer association participation.¹⁰⁶

Pre- and post-market surveillance occurs via the requirement to register all fortified foods, all processed foods (for sale, import, distribution, manufacture) and any foods to be advertised (which includes labelling) in Nigeria with NAFDAC, and registration must be renewed. NAFDAC has created an online portal for the registration of foods and other items (<https://registration.nafdac.gov.ng/>). NAFDAC is also responsible for enforcing food regulations. NAFDAC officers can enter premises and take samples and documentation, and there are tiered penalties for those who contravene the main Acts and their regulations, including in relation to fortified foods.

As a Member State of the Economic Community of West African States (ECOWAS), Nigeria is required to harmonise national policies with those of other ECOWAS Member States and is subject to a range of governance arrangements. However, it is unclear to what extent harmonisation has taken place or has been driven by ECOWAS, as only high-level actions, largely relating to fortification, were identified in ECOWAS regulatory and strategy documents as outlined further below.

Structure of nutrition labelling laws

Nigeria’s nutrition labelling regulatory regime is structured as follows:

- *Food and Drugs Act of 2004*¹⁰⁷ prohibits false or misleading labelling and labelling that indicates a food has medicinal properties. The Act also sets out enforcement provisions and the Minister for Health’s powers in relation to food and other substances covered by the Act and requires certification for imported foods.
- *National Agency for Food and Drug Administration and Control Act 2004* (NAFDAC Act)¹⁰⁸ establishes NAFDAC, its functions and powers, including to regulate and administer food labelling.
 - *Food Products Advertisement Regulations 2021*¹⁰⁹ require all food products that are manufactured, imported, distributed or sold in Nigeria to be registered with NAFDAC before advertisement (which includes labelling) and prohibits misleading or deceptive advertisements. The regulations also limit the nutrition and health claims that can be made in food advertisements.
 - *Processed Food Registration Regulations 2005*¹¹⁰ require processed food products and labelling to be registered with NAFDAC and set out registration requirements.

- **Food, Drug and Related Products (Registration) Act 2004**¹¹¹ prohibits the manufacture, import, export, advertisement, sale, or distribution of food (and other products) in Nigeria unless they have been registered with NAFDAC. The Act also establishes the Food and Drug Registration Committee which advises NAFDAC on registration applications.
- **Regulations made under both the Food, Drugs and Related Products (Registration) Act and the NAFDAC Act:**
 - **Pre-Packaged Food (Labelling) Regulations, 2022**¹¹² set out the labelling requirements for all pre-packaged foods manufactured, imported, exported, sold or distributed in Nigeria, including general requirements (e.g., name of food and ingredients). The Regulations also mandate nutrient declarations and prohibit false and misleading labelling, non-compliant labelling, and medicinal claims. These regulations revoke the previous food labelling regulations and bottled water labelling regulations and apply to products fortified under the two fortification regulations outlined directly below.
 - **Food Fortification Regulations 2021**¹⁰³ alongside fortification requirements, set out requirements for the inclusion of vitamins and minerals in nutrient declarations and for nutrition and health claims and SNI for foods fortified with vitamin A. The regulations also require all fortified foods that are manufactured, imported, exported, distributed, advertised, sold or used in Nigeria to be registered with NAFDAC.
 - **Food Grade (Table or Cooking) Salt Regulations 2021**¹⁰² along with iodisation requirements, set out labelling requirements for food grade salt, including an SNI and specific claims for iodised salt. The regulations also require all iodised salt manufactured, imported, exported, distributed, advertised, sold or used in Nigeria to be registered with NAFDAC.

As a Member State of the *Economic Community of West African States (ECOWAS)*, Nigeria is bound by the Treaty and Decision below, with other strategy documents indicating areas of action for ECOWAS and its Member States as indicated:

- The **1975 Treaty of the Economic Community of West African States**¹¹³ establishes a common market and requires the harmonisation of national policies and standards and the promotion of regional integration.
- **ECOWAS 2025 Strategic Policy Framework – Summary**¹¹⁴ will be translated into five-year programmes and states that agricultural policies should consider improving food quality and nutrition via food fortification. The Strategy also seeks to promote inclusive food value chains and integrate the regional market, including packaging.
- **Regional Agriculture Investment Plan and Food Security and Nutrition 2016-20**¹¹⁵ include actions to support Member States to promote nutrition and agricultural programmes, including food fortification and bio-fortification, via a range of mechanisms such as regulation and competitive funding. It also covers an action to streamline regional food and nutrition security governance mechanisms.
- In **Decision A/Dec. 11/01/05 West African Agricultural Policy of the Economic Community of West African States (ECOWAP), 2005**¹¹⁶ Member States have committed to harmonising national agricultural policies with regional policy, including food security. Through harmonisation, this may broadly include fortification, although fortification is not specifically mentioned.

ECOWAS also has an ECOWAS Standards Harmonisation Model (ECOSHAM) that defines a system to harmonise standards within ECOWAS. This system does not mandate harmonisation, rather after standards are approved, the standard text is “available to each [National Standards Body] for adoption and implementation within its system of national standards,”¹¹⁷ although it is understood that Member States are expected to adopt and implement them domestically. ECOSHAM has a standard for the general labelling of packaged foods (ECOSTAN 50: 2015 – Labeling of prepackaged foodstuffs – that we were unable to locate) and is based on an ECOSTAND 47:2015 Standards for Enriched Soft Wheat Flour.¹¹⁸ It applies to fortified wheat flour and thus may apply to other fortified foods in ECOWAS. Based on our review of Nigeria’s regulatory environment, it appears Nigeria has not implemented ECOWAS standards for fortification and nutrition labelling even though such standards may align with Nigeria’s existing regulatory environment.

Policy context and objectives

The **2016 Nigeria National Plan of Action on Food and Nutrition**¹⁰⁴ provides a framework for coordinated action to address malnutrition in all its forms in Nigeria. It includes action on both LSFF and nutrition labelling. Fortifying staple foods during production and processing up to consumption level is listed within actions to ‘improve food preparation and quality’ and establishing standards for nutrition labelling and advertisement of all foods is included under actions to ‘protect the consumer through improved food quality and safety’. The Plan guides the identification, design and implementation of intervention activities across different relevant sectors and provides a framework for monitoring and evaluation. In addition, the **National Multi-Sectoral Action Plan for the Prevention and Control of NCDs (2019 – 2025)**¹¹⁹ includes adopting standards for FOPNL as one of the actions identified to reduce the salt content of processed foods and references the use of labelling policies to reduce trans-fats in the food supply to promote healthy diets.

Beyond the above action plans, Nigeria's development of labelling regulations seeks to ensure a degree of coherence, for example, via prohibiting claims that describe food as 'healthy,' encourage or condone excessive food consumption, or disparage good dietary practices. However, we also identified potential challenges to policy coherence between LSFF and policies to address overnutrition. For example, mandatorily fortified foods include products such as sugar and margarine, and several foods that can be voluntarily fortified are likely to be foods high in sugars, fats and/or sodium (e.g., breakfast cereals, fruit nectars and fruit drinks, instant breakfasts, and condensed milk).

Nutrition labels

Nutrient declarations are mandatory on all pre-packaged foods unless NAFDAC makes exceptions for certain foods (e.g., single-ingredient foods, spices, and herbs). Mandatorily fortified foods must include the amount of vitamins and/or minerals added to the food in the nutrient declaration. Vitamins and minerals included in the nutrient declaration (for mandatorily fortified products or voluntarily for other products) must contain a minimum of 5% of the NRV for that vitamin or mineral per serving, with this percentage stated alongside the quantity contained.

Nutrition and health claims are largely voluntary but must meet certain conditions, including that they must be substantiated before approval (although it is unclear how based on the regulations). Nutrition claims on fortified foods are only allowed for vitamins and minerals (e.g., 'a source of') if they meet a percentage of an NRV. Some claims are prohibited, such as those that represent food as a treatment for or the prevention of disease. Specific claims are outlined for iodised salt, and some fortification claims for calcium, phosphorous and/or iron are mandatory.

Supplementary nutrition information: A fortification logo is required on foods mandatorily fortified with vitamin A (sugar, wheat and maize flour, vegetable oil and margarine and butter) and an **iodised salt logo** is required on mandatorily iodised salt. A **regional 'Enrichi' logo** is also available for use on wheat flour and cooking oil fortified with vitamin A as part of the 'Fortify West Africa' programme that ran throughout ECOWAS countries in conjunction with development partners between 2011 and 2017. Further, the 2019 Nigerian National Multi-Sectoral Action Plan for the Prevention and Control of NCDs lists the adoption of standards for **FOPNL** as a priority action to promote healthy diets.



Vitamin A fortification logo¹²⁰

This logo which includes a green map of Nigeria with a black edge and three human figures in white was unable to be located.

Iodised salt logo



Regional ECOWAS 'Enrichi' logo¹²¹

Recommendations to reform nutrition labelling regulations to enable LSFF

- Increased attention should be paid to the interaction of fortification and food labelling to **ensure that policies and regulations coherently address over- and under-nutrition**. Specifically, while relevant regulations were only adopted in 2021, the government would ideally review foods that can be voluntarily fortified and/or, at the least limit claims that can be made on unhealthy voluntarily fortified foods to avoid health 'halo' effects on these products.
- At this time, given existing fortification logos and claims and the government's consideration of FOPNL, we **do not recommend that additional fortification logos or claims be considered unless** care is taken to align and coordinate these policies so that they enhance consumer understanding and mitigate potential confusion (e.g., this may be improved through a consolidated logo such as in South Africa).
 - If **claims regulations** were updated, stipulations on health claims could be considered to improve regulations such as including additional information on labels where appropriate, including a target group, how to use the food to obtain the claimed benefit and other lifestyle factors, other dietary sources where appropriate, and the importance of maintaining a healthy diet).
- **Regulatory governance** under NAFDAC covers most key elements (authority, funding, requirements to publish data from performance, promotion and pre- and post-market surveillance), but there was little public data on the processes of regulatory design and drafting, evaluation, and complaints handling to promote transparency. Further, although NAFDAC is required to educate consumers and industry (by promoting the standards) and monitor and enforce labelling, it remains important that these aspects of regulatory governance are adequately and sustainably prioritised and funded.

Information sources and limitations

We only undertook a desktop regulatory review in Nigeria. As part of this, we identified little detail on several aspects of regulatory governance, including processes for regulatory design and drafting, consumer education, guidelines for evaluation and enforcement transparency, and complaints handling. Such information may sit outside of the regulatory documents reviewed.

Table 7 – NIGERIA – Summary of nutrition labelling regulations

Excludes draft regulations unless specified.

Regulatory form and substance	Nutrient declaration	Nutrition and health claims	SNI
<p>Regulatory framework</p> <ul style="list-style-type: none"> Nutrient declarations are mandatory for all pre-packaged foods (including fortified foods¹⁰³ and iodised salt)¹⁰² although NAFDAC can in appropriate circumstances prescribe exceptions for some foods (e.g., single ingredient foods, spices and herbs, small units with a surface area <10cm², nutritionally insignificant foods and others as determined by NAFDAC).¹¹² 	<ul style="list-style-type: none"> None identified. 	<ul style="list-style-type: none"> Voluntary nutrition and health claims are permitted, and some claims are prohibited (e.g., medicinal claims) or have conditions.^{105,109,112} Specific mandatory claims for calcium, phosphorus and/or iron.¹⁰⁵ Iodised salt claims (or names). 	<ul style="list-style-type: none"> Mandatory fortification logo on foods mandatorily fortified with Vitamin A and Iodised salt.^{102,103}
<p>Regulatory objective(s)</p>	<ul style="list-style-type: none"> None identified. 	<ul style="list-style-type: none"> None identified. 	<ul style="list-style-type: none"> None identified.
<p>Operative terms and conditions</p>	<ul style="list-style-type: none"> The nutrient declaration must be given per 100g/ml or per serving of a product and contain:¹¹² <ul style="list-style-type: none"> energy value in kJ/kcal; amount of fat, specifying saturated fat and trans-fat, carbohydrate specifying the quantity of sugar, and protein; salt; and the amount of any other nutrient for which a nutrition or health claim is made. For products containing fats and oils, including emulsions alone or as part of processed foods, nutrient declarations must include:¹¹² <ul style="list-style-type: none"> amount of type of fatty acids in grams or amount of cholesterol; amount of saturated fatty acids, monounsaturated fatty acids and polyunsaturated fatty acids in grams and cholesterol; in mg. Vitamins and minerals must be expressed per 100g/ml and as a % of the NRV and can only be included in the declaration if they are present in an amount $\geq 5\%$ of the NRV per 100g/ml as quantified on the label.¹¹² <ul style="list-style-type: none"> For fortified foods, vitamins and minerals can only be declared where they meet the requirements of the Food Fortification Regulations, the vitamin or mineral is at least 5% of the NRV per serve, and is expressed as a % of the NRV per 100g/ml or per package if it only contains a single serve, plus as a % daily value on the product.¹⁰³ Where labelling of food places special emphasis on the:¹¹² <ul style="list-style-type: none"> presence of one or more ingredients, the presence of the ingredient by mass must be declared in the final product; the low content of one or more ingredients, the % of the ingredient by mass in the final product. Any statement on labels must be clear, prominent, and legible, and labelling must be in English and may include any other language.¹¹² 	<p>Food product claims:</p> <ul style="list-style-type: none"> Must be adequately substantiated before approval (e.g., 'natural', 'product of choice' claims). Labels must accurately interpret research findings, with any reference in a label (advertisement) to be verified by NAFDAC.¹⁰⁹ Related to 'source', 'dietary source', etc regarding energy and/or protein must meet specifications.¹⁰⁹ Can only use the word 'nutritious' or similar if they meet conditions, including that they contain a range of nutrients including carbohydrates, fat, protein, vitamins and minerals (i.e., at least four vitamins and two minerals (excluding sodium) of an amount that meet criteria for claim as source).¹⁰⁹ <p>Any nutrition claim must be justified expressly in the nutritional information (nutrient declaration) on the food label.¹¹²</p> <p>For fortified foods/food products:¹⁰³</p> <ul style="list-style-type: none"> Nutrition content claims should comply with the conditions of the Food Fortification Regulations (e.g., Source of [Vitamin/Mineral] – at least 5% of NRV per 100g / 100ml / serving for claims of 'a source of' and increasing levels to claim 'a good source of' and 'excellent source of') Where fortified in line with the Food Fortification Regulations, advertising or labelling for a food must state: a) in the case of calcium or phosphorus, that it is a factor in the normal development and maintenance of bones and teeth, especially in infants and children; and b) in the case of calcium, phosphorus or iron, that it is a factor in the maintenance of good health. <p>For iodised salt:¹⁰²</p> <ul style="list-style-type: none"> The name of the label must be salt and include 'food grade' or 'table' or 'cooking'. Particulars must be included if cyanide salt is added. When salt is used as a carrier for one or more nutrients and labelled as such for public health reasons, the name of the product shall be declared properly on the label as 'salt fluoridated', 'salt iodated', 'salt iodised', 'salt fortified with iron', 'salt fortified with vitamins', or as prescribed by the Agency, included in the ingredient list. A salt cannot be represented as 'reduced in sodium' unless it contains $\leq 25\%$ less sodium than regular table salt. Labelled with the difference in the amount of sodium by %, fraction, or mg. <p>Claims cannot:</p> <ul style="list-style-type: none"> Represent food as medicinal, such as having preventive, alleviative or curative effects of a disease, disorder or physiological condition^{112,107} or having 'guaranteed effectiveness'.¹⁰⁹ Similarly, fortified foods cannot specifically be sold or advertised among other things as a treatment, preventative or curative of diseases, disorders or abnormal physical states as specified in the regulations (e.g., Goitre, mental conditions).¹⁰³ Describe food as 'healthy' or represent it in a way that implies the food will impact health.¹⁰⁹ Encourage or condone excessive consumption of any food or disparage good dietary practice.¹⁰⁹ Refer to medical or allied health professions unless the reference is scientifically proven.¹⁰⁹ <p>Comparative claims must not mislead the public directly or indirectly and where a comparison is made it must be supported by scientific evidence, among other things.¹⁰⁹</p>	<ul style="list-style-type: none"> Vitamin A fortification logo: A picture of an eye with an "A" at the centre of the eye. This logo is mandatory on sugar, wheat and maize flour, vegetable oil, and margarine and butter, which are subject to mandatory fortification.¹⁰³ Iodised salt logo: Mandatory fortification of salt with iodine. The label of iodised salt must include the iodised salt logo of a green map of Nigeria with a black edge and three human figures in white.¹⁰² A priority of the National Multi-Sectoral Action Plan for the Prevention and Control of Non-Communicable Diseases (2019) is to adopt standards for FOPNL.¹¹⁹

Regulatory governance	
<p>Drafting regulatory rules and scheme design</p>	<ul style="list-style-type: none"> • Under the Food and Drugs Act, the Minister for Health may make regulations to carry out the purposes of this Act or any matter connected with it. The Minister can also establish a Food and Drug Advisory Council to assist and advise the Minister on preparing and reviewing regulations related to the Act.¹⁰⁷ • Under the NAFDAC Act, NAFDAC is responsible for the regulation and control of food processes and labelling. Its Governing Council advises the federal government on national policies for the control and quality of food and with the approval of the Minister for Health it can make relevant regulations.¹⁰⁸ • Under the Treaty of the Economic Community of West African States, the ECOWAS Authority (Heads of State and Government members) determines the general policy and guidelines for the community, oversees the functioning and implementation of community objectives and appoints delegates to the Council. The Council of Ministers is responsible for the functioning and development of the Community, can issue directives and make recommendations to the Authority, prepares and adopts rules of procedures, and approves work programmes and budgets. Technical Commissions are responsible for preparing Community programmes and projects, ensuring the harmonisation of projects and programmes, and other functions as required. Member states are required to harmonise national policies.¹¹⁵
<p>Administration</p>	<ul style="list-style-type: none"> • Under the NAFDAC Act¹⁰⁸ NAFDAC is responsible for regulation and control of food processes and labelling, including compiling, monitoring, and promoting standards and guidelines, advising the government, the private sector and others on regulatory and related matters, and publishing relevant data from the performance of its functions. NAFDAC's funding is outlined in the Act and includes revenue from its fees. • Under the following, food products and related elements must be registered with NAFDAC via an application, which NAFDAC must approve and is responsible for enforcing: <ul style="list-style-type: none"> - Food, Drug and Related Products (Registration) Act¹¹¹: all processed food. If approved, a registration certificate is issued that is valid for five years and can be renewed. NAFDAC can publish registrations in the Gazette. The Act also establishes the Food and Drug Registration Committee which evaluates applications to register foods and food products, including their labelling, and advises NAFDAC on applications, including their withdrawal, suspension or cancellation. - Processed Food Registration Regulations:¹¹⁰ all processed food products. Applications must include product samples and labelling, the original certificate of analysis, and evidence supporting any special labelling claims. NAFDAC can inspect an establishment as part of the registration process. If approved, a registration certificate is issued and must be produced by a manufacturer within 48 hours of NAFDAC's request. - Food Products Advertisement Regulations:¹⁰⁹ all advertisements (including labelling) for food products. If approved, the registration is valid for one year. - Food Fortification Regulations 2021:¹⁰⁷ all fortified foods. - Food Grade (Table or Cooking) Salt Regulations 2019:¹⁰² all salt for human consumption. • The ECOWAS 2025 Strategic Policy Framework summary specifies that the implementation of development programmes is affected through the Regional Agency for Agriculture and Food (RAAF) which provides the administrative, technical and financial management of programmes and is responsible for their monitoring and evaluation.¹¹⁴
<p>Monitoring</p>	<ul style="list-style-type: none"> • See Administration re NAFDAC powers and functions, including monitoring. • The National Plan of Action on Food and Nutrition in Nigeria 2016¹⁰⁴ establishes a plan for monitoring and evaluation of its actions, coordinated by the Ministry of Budget and National Planning. • The ECOWAS 2025 Strategic Policy Framework specifies that the ECOWAS Commission monitors the implementation, results, and impact of all ECOWAS policies following an established framework, aiming to track information at national and regional levels, and ensure cohesion between national investment monitoring and control systems, and promote an open dialogue between stakeholders. Due to poor baseline and incomplete information systems with member states, it was difficult to evaluate the effectiveness of ECOWAS. National Steering Committees and regional actors are required to report on performance.¹¹⁴
<p>Evaluation</p>	<ul style="list-style-type: none"> • Under the NAFDAC Act,¹⁰⁸ NAFDAC must submit to the Minister for Health an annual report on its activities for the previous year and its audited accounts. • See above under the Food and Drugs Act,¹⁰⁷ the Minister can establish a Food and Drug Advisory Council to assist and advise on the preparation and review of regulations;¹⁰⁷ National Plan of Action on Food and Nutrition in Nigeria 2016.¹⁰⁴ • See Monitoring regarding evaluation under ECOWAS.

Enforcement

- Under the Food and Drugs Act¹⁰⁷ various misleading practices are prohibited (such as the contravention of standards) and:
 - NAFDAC's inspecting officers may enter premises used to manufacture, prepare, preserve, package, store, or sell food, and investigate premises, take samples and/or specimens, examine and copy documentation or records relevant to enforcement, and seize and detain products that do not comply with the regulations.
 - Any person who contravenes the Act, its regulations or any notice issued under them, is guilty of an offence and is liable on conviction to a fine and/or imprisonment.
- Similarly, under the NAFDAC Act¹⁰⁸
 - NAFDAC officers can enter premises, inspect products and take samples.
 - Contravention of any provisions under the Act or its regulations on conviction results in penalties specified under the regulations, or if none are specified, under this Act.
- Under the following Acts and/or regulations, contraventions on conviction result in financial penalties and/or imprisonment, and forfeiture of assets related to the offence:
 - **Food, Drug and Related Products (Registration) Act**¹¹¹ NAFDAC also has the power to suspend or cancel the registration of a food if, for example, the product does not meet the standards upon which it was registered.
 - Processed Food Registration Regulations¹¹⁰
 - Food Products Advertisement Regulations¹⁰⁹ For example, advertising a food without NAFDAC registration.
 - Food Grade (Table or Cooking) Salt Regulations¹⁰² For example, import, export, distribute, sell, or advertise any unregistered salt for human consumption.
 - Food Fortification Regulations¹⁰⁵ For example, selling or advertising any food labelled as fortified that is unregistered and/or not fortified in line with the regulations.
 - Pre-Packaged Food (Labelling) Regulations¹¹² For example, non-compliant food labelling and making a non-NAFDAC-authorized advertisement claim or professional association endorsement on a food product label contravenes the regulations.

Section references

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