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The Assessment of the Implementation of the Proceeds of Crime (Recovery and Management) Act, 2022 in Nigeria

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By

Africa Network for Environment and Economic Justice (ANEEJ)

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Executive Summary

Nigeria's Proceeds of Crime (Recovery and Management) Act, 2022 (POCA) and the Proceeds of Crime (Standardised Automated Asset Forfeiture Management System) Regulations, 2024 were introduced to address longstanding challenges in the identification, recovery, management and disposal of proceeds of crime. Before POCA, asset-recovery responsibilities and practices were spread across multiple institutions and legal frameworks, with concerns about coordination, transparency, accountability and the risk of recovered assets being mismanaged or re-looted. More than four years after the Act's enactment, this study assesses how its principal obligations and the 2024 Regulations are being implemented in practice.

The study uses a qualitative-dominant implementation-assessment design, combining legal and documentary review with semi-structured interviews with 15 key informants from POCA-designated relevant organisations, coordinating institutions, civil society organisations and practitioners. Numerical figures reported in the findings are primarily interviewee estimates or agency-reported figures; they should not be read as results from a representative quantitative survey or an independent audit of agency records.

The principal findings are as follows:

01 POCA has prompted institutional reforms, but implementation remains uneven. Some relevant organisations have established or upgraded proceeds-of-crime structures, developed standard operating procedures (SOPs) and begun reporting to the national central database. Others remain at earlier stages of implementation.

02 Legal questions and tensions remain. Interviewees identified possible conflicts between POCA and sector-specific provisions, alongside concerns about transparent appointment and oversight of private asset managers and auctioneers, and the accessibility and timeliness of victim restitution. These issues require careful legal interpretation and, where necessary, targeted legislative or regulatory clarification.

03 Institutional fragmentation persists. Asset-recovery functions remain distributed across multiple organisations. ARMU has a coordinating role, but interviewees described gaps in routine coordination, information-sharing and consistent implementation across agencies. Overlaps and occasional rivalry remain, although some stakeholders reported improvements in cooperation, particularly in selected high-profile cases.

04 Technical infrastructure is a constraint. Interviewees reported limitations in interoperability, connectivity, hardware, historical records and staff capacity. These challenges can affect the accuracy, completeness and timeliness of internal records and submissions to the national central database.

05 Capacity constraints cut across the system. Interviewees identified shortages of specialised investigators, database officers, forensic-accounting expertise and legal practitioners familiar with complex financial cases and non-conviction-based forfeiture. Awareness of POCA and the Regulations also varies across institutions and professional groups.

06 Transparency and oversight remain limited. The database exists, but the study found uneven reporting and limited public access to consolidated information on domestic and external recoveries, disposals and the use of proceeds. Interview evidence also indicates that current arrangements do not consistently secure timely compliance by all relevant organisations. This study did not independently determine the full extent of the Attorney-General's or the Ministry of Justice's available enforcement powers.

07 Civil society is an active but relatively small oversight community. A number of CSOs have advocated for POCA, monitored selected asset returns and engaged with public institutions. However, wider public awareness remains low, and civil-society participation in monitoring disposal and utilisation is not yet systematic.

The priority recommendations are to: (1) clarify the legal and institutional arrangements for coordination and compliance, including through targeted amendments where necessary; (2) issue public implementation guidance and require relevant organisations to align internal rules and SOPs with POCA and the Regulations within defined timelines; (3) establish or formally designate a standing inter-agency coordination mechanism with a clear mandate; (4) address priority IT, connectivity and data-quality constraints; (5) institutionalise joint training for investigators, database officers, prosecutors and judges; and (6) improve public-facing reporting and create structured, appropriate opportunities for civil-society monitoring of major disposals and the use of proceeds.

The policy implication is that POCA implementation should be treated as a sustained governance and institution-building effort. Targeted legal clarification, stronger coordination, adequate technical and human resources, reliable reporting and public-facing accountability measures would help move the framework from formal requirements towards more consistent practice and demonstrable public benefit.

CHAPTER ONE:

Introduction and Context

Anti-money laundering and asset recovery now occupy a central place in Nigeria's anti-corruption landscape because corruption, money laundering and related offences have generated vast illicit proceeds that erode state capacity and public trust. Asset recovery, as described by the Technical Unit on Governance and Anti-Corruption Reforms (TUGAR), is an economic strategy that both eliminates harmful role models and generates funds for social reform because criminal convictions alone - without confiscating and returning stolen assets - do not effectively deter corruption.[1] Similarly, TUGAR emphasises that success in managing returned assets, including deciding how they are used and keeping the public informed, is critical for building confidence in public institutions and in the wider anti-corruption drive.[2] This crucial point is stressed further in another report by the Civil Society Legislative Advocacy Centre (CISLAC) which situates Nigeria's asset recovery efforts within the continent-wide struggle against illicit financial flows and highlights that over the last 25 years Nigeria has led Africa with more than USD 5 billion in recovered assets, even as it continues to face serious challenges in managing these resources transparently and effectively.[3]

Within this overall anti-corruption scheme, illicit financial flows are closely tied to weaknesses in Nigeria's preventive and enforcement frameworks for the recovery and management of the proceeds of crime. The CISLAC report underlines that although Nigeria has enacted key statutes such as the Money Laundering (Prevention and Prohibition) Act 2022 and the Terrorism (Prevention and Prohibition) Act 2022, enforcement remains uneven, contributing to Nigeria's grey-listing by the Financial Action Task Force in January 2023 for strategic deficiencies in its AML/CFT regime.[4] The same report stresses that the Nigerian Financial Intelligence Unit (NFIU) has become a central hub for processing suspicious transaction reports and coordinating with the Egmont Group. Yet, broader institutional capacity and political will still lag behind the scale of illicit financial flows.[5] More broadly, TUGAR recalls that staggering sums were lost domestically in one official release - N1.34 trillion stolen between 2006 and 2013 by only about 50 individuals across governors, businessmen, bankers and civil servants - underscoring that combating IFFs through asset recovery is indispensable if corruption is to be addressed as a structural development problem rather than isolated criminality.[6]

Before the enactment of the Proceeds of Crime (Recovery and Management) Act, 2022 (POCA), the landscape of asset recovery and management in Nigeria was marked by fragmentation, ad hoc

[1] TUGAR *Policy Brief on a Framework for Asset Recovery and Management in Nigeria* available online at http://tugar.org.ng/wp-content/uploads/2017/09/POLICY-BRIEF-ON-A-FRAMEWORK-FOR-ASSET-RECOVERY-AND-MANAGEMENT-IN-NIGERIA.pdf (accessed 20 March 2026) 2–3
[2] TUGAR *Policy Brief* 3
[3] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 8–9, 33. See also MB Diop 'Combating money laundering in the age of digital transformation: A comparative study between Türkiye and Nigeria' (2025) 9 *Journal of Economic Criminology* 100165.
[4] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 8, 10–11
[5] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 15–17
[6] TUGAR *Policy Brief* 4

arrangements and considerable opacity.[7] Although multiple laws empowered agencies such as the EFCC, ICPC, Code of Conduct Bureau, National Drug Law Enforcement Agency and others to identify, trace, seize and seek forfeiture of proceeds of crime, the provisions on how seized or forfeited assets were to be managed were either minimal or non-existent, leaving each agency to improvise its own practices.[8] For instance, the Corrupt Practices and Other Related Offences Act 2000 provides for forfeiture but "did not elaborate on the mechanism for managing such forfeited assets",[9] while the EFCC (Establishment) Act 2004 empowers the Secretary to dispose of property after final forfeiture and may otherwise deal with the property, but is silent on interim management and broader accountability questions.[10] The predictable consequence was the deterioration and dissipation of recovered assets, along with a "lack of transparency and accountability in the management process", which led to huge losses and public mistrust.[11]

International assessments of Nigeria's pre-POCA position captured this mixed picture of activism and weakness. The Inter-Governmental Action Group against Money Laundering (GIABA), a specialised institution of ECOWAS, notes that, following the 2021 mutual evaluation, Nigeria entered Enhanced Follow-Up due to multiple technical and effectiveness deficiencies, particularly in relation to DNFBPs, beneficial ownership transparency, supervision, and cash couriers.[12] While the same report acknowledges that Nigeria has since strengthened several areas and is now rated "Largely Compliant" on Recommendations 24, 25, 28 and 32 - concerning transparency of legal persons and legal arrangements, supervision of DNFBPs and regulation of cross-border cash movements - it also confirms that Nigeria remains only "Partially Compliant" on key DNFBP obligations (Recommendations 22 and 23), with moderate shortcomings around beneficial ownership verification, tipping-off and the application of enhanced due diligence to PEPs.[13] From the perspective of asset recovery and management, these evaluations reinforced the sense that Nigeria, despite its activism in UNCAC and AU forums, still lacked a coherent, credible domestic framework for managing recovered assets that satisfied international best practices and fostered trust at home.

Civil society and policy work in the pre-POCA era repeatedly called for a unified asset recovery and management framework. TUGAR, building on UNCAC obligations and FATF guidance, argued as early as 2017 for an "integrated asset recovery and management strategy" that would address both the legal gaps around non-conviction-based forfeiture and the institutional problem of uncoordinated asset management across agencies.[14] It pointed out that the then Proceeds of Crime Bill sought to create a dedicated asset management agency and a centralised framework, but also warned that some provisions risked impeding the investigative and prosecutorial work of law-enforcement agencies if not carefully drafted.[15] At the same

[7] ME Jemialu 'Nigerian Proceeds of Crime Act, 2022: Accountability Deficit on Recovered Proceeds of Crimes' (2022) 8(6) *International Journal of Law* 1
[8] DJ Ayinde '*An appraisal of the legal and institutional frameworks for the management of seized and forfeited assets in Nigeria'* (2025) 28(7) *Journal of Money Laundering Control* 17
[9] Corrupt Practices and Other Related Offences Act 2000, section 47
[10] EFCC (Establishment) Act 2004, section 31(2). This provisions of the EFCC Act been used to deal with properties based on discretion which could including managing the property.
[11] TUGAR *Policy Brief* 6–8
[12] GIABA *Anti-Money Laundering and Counter-Terrorist Financing Measures – Nigeria*, Third Enhanced Follow-up Report and Technical Compliance Re-Rating (2024) available at https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-fur/Nigeria-FUR-GIABA-November-2024.pdf (accessed 20 March 2026)1–2, 18–23
[13] GIABA *Anti-Money Laundering and Counter-Terrorist Financing Measures – Nigeria*, Third Enhanced Follow-up Report and Technical Compliance Re-Rating (2024) available at https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-fur/Nigeria-FUR-GIABA-November-2024.pdf (accessed 20 March 2026) 3–7, 18, 21–23)
[14] TUGAR *Policy Brief* 8–11
[15] TUGAR *Policy Brief* 8–9

time, the brief highlighted other systemic weaknesses that undermined asset recovery and accountability - such as the limited verification capacity of the Code of Conduct Bureau and the lack of public access to asset declarations despite the Freedom of Information Act - underscoring that asset recovery could not be divorced from broader questions of transparency and governance.[16]

Against this backdrop, the eventual enactment of the Proceeds of Crime (Recovery and Management) Act in 2022 is widely perceived as a landmark achievement. However, there is a case for cautious celebration. CISLAC's assessment points out that POCA "took nearly 20 years to pass with the substantial involvement of CSOs and the international community", and that it now provides a broad framework covering multiple forms of assets and cutting across all agencies with recovery mandates.[17] The Act requires each 'relevant organisation' to establish a Proceeds of Crime Management Directorate, mandates the payment of proceeds into a Confiscated and Forfeited Properties Account at the Central Bank of Nigeria, and provides for the creation of a central database and inventory of recovered assets.[18] The role of civil society actors such as CISLAC, ANEEJ and others in both advocating for POCA's passage and shaping its content cannot be overemphasised. As rightly noted, Nigerian CSOs "have built substantial expertise in all phases of the asset recovery process" and have been influential in promoting CAPAR-aligned reforms.[19] This sustained advocacy, including earlier policy work such as TUGAR's EU-supported Policy Brief, underpins the sense that POCA's adoption is a collective achievement rather than a top-down technocratic exercise.

Beyond its symbolic value, POCA has clear policy significance. The Act gives Nigeria, for the first time, a cross-cutting legal framework for the recovery, administration and disposal of proceeds of crime, including detailed provisions on preservation orders, the appointment of asset managers, and the maintenance of records by Proceeds of Crime Management Directorates.[20] The Act and the ensuing Regulation also operationalise long-standing recommendations in international guidance by providing for the creation of a central account and national central database of recovered assets, measures that are designed to reduce the risks of re-looting and ensure that information on recovered assets can, at least in principle, be consolidated and monitored.[21] More broadly, the combination of POCA with other reforms - such as the establishment of a national beneficial ownership register under the Companies and Allied Matters Act 2020 and Nigeria's active role in designing CAPAR - positions the country as an important test case for how African states can translate regional norms on asset recovery into domestic legislation and institutions.[22]

Despite the foregoing, the existence of a statute does not in itself guarantee effective asset recovery and management. According to Sproat *et al*, "while the … Act aims to streamline asset recovery initiatives in Nigeria, there is no guarantee that efforts to use the powers contained in this Act will avoid existing

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[16] TUGAR *Policy Brief* 9
[17] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 28, 31
[18] POCA, Section 3
[19] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 7, 27–28, 33
[20] See POCA generally.
[21] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 28–31; TUGAR *Policy Brief* 10–11
[22] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 21, 24–25

systemic problems that undermine the effectiveness of implementation on the ground."[23] CISLAC report concludes that "the Proceeds of Crime Act has not been implemented fully", pointing in particular to the fact that agencies are required to keep records of recovered assets but do not make these records publicly accessible, and that there are no regular public updates from any of the main asset-recovering institutions on the volume or use of assets they have recovered and disposed of.[24] The report stresses that coordination remains difficult because more than ten agencies continue to hold overlapping asset-recovery mandates and the law did not centralise functions in a single specialised body; as a result, the multi-agency structure "creates a vacuum in the coordination of asset recovery initiatives" and hampers Nigeria's standing regionally and globally.[25] While praising significant progress in technical compliance across several recommendations, the GIABA's 2024 Follow-Up Report similarly notes that deficiencies persist in beneficial ownership transparency, the proportionality of sanctions, and DNFBP supervision, all of which bear directly on the upstream conditions for successful asset tracking and confiscation.[26] In TUGAR's terms, Nigeria has moved closer to the kind of framework envisaged by UNCAC and FATF, but the "processes and procedures for the management of recovered assets have not fully developed" in practice.[27]

This is where the current commissioned study finds its policy relevance and contemporary significance. Whereas much of the existing Nigerian scholarship and policy analysis has focused on evaluating the content of POCA and related legislation, they do not systematically address the gap between law and implementation. CISLAC provides an important civil society assessment of CAPAR-related practices across detection, recovery, management, and cooperation. However, it necessarily ranges widely and only touches on POCA implementation among several factors.[28] TUGAR's Policy Brief predates POCA and focuses more on advocating for an integrated framework than on empirically evaluating how any particular statute operates.[29] The GIABA Follow-Up Report, for its part, is structured around FATF recommendations, with asset recovery and POCA appearing mainly in relation to cash couriers and confiscation powers rather than as standalone implementation studies.[30] Collectively, these works highlight the need for a dedicated, implementation-focused assessment that moves beyond desk analysis of legislation to examine how Nigeria's new proceeds-of-crime framework is being translated into institutional practice.

The essence of this study is precisely to respond to that need. Building on concerns about deteriorating assets and opaque management, and on the finding that POCA's provisions on record-keeping, directorates, and central accounts are not yet fully operationalised, the study seeks to examine the extent to which the relevant organisations are implementing key obligations created by POCA.[31] Rather than offering another doctrinal appraisal of POCA's text, it aims to document institutional compliance,

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[23] P Sproat *et al* 'Non-Conviction Based Asset Recovery in Nigeria: An Additional Tool for Law Enforcement Agencies?' in D Goldbarsht & L de Koker *Financial Crime, Law and Governance: Navigating Challenges in Different Contexts'* (2024, Springer)34.
[24] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026)
[25] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 8, 22–23, 27–31
[26] GIABA *Nigeria Third Enhanced Follow-Up Report* 6–7, 18–23
[27] TUGAR *Policy Brief* 11
[28] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 27–33
[29] TUGAR *Policy Brief* 2–3, 8–11
[30] GIABA, Nigeria Third Enhanced Follow-Up Report, 2–4, 15–16, 18–23)
[31] TUGAR, Policy Brief, 6–8; Prusa, CAPAR Implementation in Nigeria, 27–31)

coordination and practice: whether agencies have in fact established functional Proceeds of Crime Management Directorates; whether they keep comprehensive records of assets and report to the central account; how they interpret and apply preservation orders; and whether the central database for recovered assets is being populated and used in a way that supports transparency and oversight. In doing so, the study also speaks directly to several of the weaknesses flagged by GIABA - including gaps in beneficial ownership verification, data quality, and sanctions - by assessing how these upstream issues manifest in concrete asset recovery cases.[32]

Crucially, the literature already suggests that such an assessment cannot be based solely on desk research. CISLAC report, for example, explicitly relied on consultations with experts and government officials to justify its indicator ratings and acknowledges that much of the most relevant information on coordination, capacity and practice is not captured in publicly available documents.[33] TUGAR's Policy Brief similarly draws attention to informal practices, capacity constraints, and political dynamics that are unlikely to be visible in statutory texts or official guidelines, such as the tendency for agencies to work in silos, the politicisation of asset declaration transparency, and the absence of effective whistle-blower protection despite policy announcements.[34] Taken together, these works support the view that an empirically grounded implementation study of POCA must combine rigorous legal analysis with qualitative methods -interviews, institutional mapping and, where possible, technical observation of the central database -to capture the "lived" operation of the law in Nigeria's complex multi-agency environment.

In sum, asset recovery and management now sit at the heart of Nigeria's anti-corruption effort. However, the country's trajectory has been one of gradual norm entrepreneurship overlaying persistent structural weaknesses. Pre-POCA, Nigeria was active internationally yet hampered by fragmented laws and institutions, as TUGAR and GIABA both attest.[35] POCA's enactment, won after years of civil society advocacy and regional norm-building under CAPAR, is rightly regarded as a milestone, with significant policy implications for how Nigeria recovers, manages, and accounts for criminal assets.[36] Nevertheless, as the CISLAC assessment's cautious tone and GIABA's continuing "Enhanced Follow-Up" status indicate, the real test lies in implementation rather than text.[37] It is precisely this terrain, i.e. how far POCA's obligations have been internalised and operationalised by Nigeria's diverse anti-corruption and law-enforcement agencies, and what gaps remain between law and practice, that the present study/report sets out to explore through a combination of desk-based and empirical enquiry. The next section will therefore set out, more explicitly, the objectives and scope of the current undertaking.

[32] GIABA, Nigeria Third Enhanced Follow-Up Report, 6–7, 18–23)
[33] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf 6–7, 15–18)
[34] TUGAR, Policy Brief, 4, 7–9, 12–13)
[35] TUGAR, Policy Brief, 5–9; GIABA, Nigeria Third Enhanced Follow-Up Report, 1–2, 18–23)
[36] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf 8–9, 27–31)
[37] (Prusa, CAPAR Implementation in Nigeria, 8, 22–23; GIABA, Nigeria Third Enhanced Follow-Up Report, 18–19)

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CHAPTER TWO:

Objectives and Scope of the Study

The study aims to assess the level and quality of implementation of the Proceeds of Crime (Recovery and Management) Act, 2022 (POCA) and the Proceeds of Crime (Standardised Automated Asset Forfeiture Management System) Regulations, 2024 in Nigeria by relevant organisations, with a view to strengthening compliance, transparency, coordination and accountability in the tracing, recovery, management and disposal of proceeds of crime. It examines the extent to which institutional practices align with the obligations set out in POCA and its Regulations, including operational guidelines, reporting requirements and internal procedures adopted pursuant to the framework.

Specifically, the study:

01 Assess the compliance of designated agencies with key provisions of POCA 2022 and the POCA Regulations, 2024.

02 Examine how far the POCA Regulations have been operationalised and are being used in day-to-day work.

03 Assess the functionality, accessibility and use of the national central database by relevant institutions, including the quality, timeliness, completeness and consistency of data, as well as data security and access controls.

04 Identify legal, institutional, technical, and capacity gaps that impede effective implementation; and

05 Provide evidence-based recommendations to improve coordination, information-sharing, reporting practices, and asset management processes across the institutional landscape.

In terms of scope, the study is focused on the practical implementation, enforcement, and operationalisation of POCA 2022 and the POCA Regulations, 2024 by institutions designated under the framework, including their systems, procedures, inter-agency arrangements, and use of the central database. It does not undertake a general doctrinal, theoretical, or exhaustive analysis or discussion of the substantive provisions of POCA 2022 or broader anti-corruption law. The engagement with the text of the Act and Regulations is limited to what is necessary to evaluate their implementation in practice.

CHAPTER THREE:

Methodology

3.1 Research Design

This study adopts a qualitative-dominant implementation-assessment design to examine implementation of the Proceeds of Crime (Recovery and Management) Act, 2022 and the 2024 Regulations in Nigeria. It combines (i) legal and documentary review with (ii) qualitative key informant interviews (KIIs) involving stakeholders directly engaged in implementation. The study does not include a representative quantitative survey or a systematic quantitative audit of agency records; numerical figures presented in the report are therefore treated as contextual indicators where their source and limitations are made clear. Desk research alone was considered insufficient because the law is relatively recent, institutional arrangements continue to evolve, and publicly available implementation data are limited.

This integrated approach follows established guidance in implementation and policy research, which recommends examining formal rules alongside stakeholder experience and observed institutional practice.[38] It is appropriate for a complex legal and governance reform where systematic quantitative indicators are limited and institutional processes, perceptions and behaviour are central to understanding implementation. The design aims to describe the state of implementation, identify recurring bottlenecks and develop evidence-informed recommendations, while distinguishing interviewee accounts from independently verified facts.

3.2 Data Sources

3.2.1 Legal review

The first component is a structured legal and institutional review. It includes examination of POCA 2022, the Proceeds of Crime (Standardised Automated Asset Forfeiture Management System) Regulations, 2024, and relevant related statutes, including the Money Laundering (Prevention and Prohibition) Act, 2022 and the enabling laws of key anti-corruption agencies. The review focuses on:

[38] Alliance for Health Policy and Systems Research & WHO (2013) *Implementation Research in Health: A Practical Guide*. Geneva: World Health Organization. See also Fetters, M.D., Curry, L.A. & Creswell, J.W. (2013) 'Achieving Integration in Mixed Methods Designs—Principles and Practices', *Health Services Research* 48(6): 2134–2156.

- The mandates, powers and obligations assigned to relevant organisations.
- The procedures for tracing, seizure, forfeiture (conviction- and non-conviction-based) and disposal of assets.
- The design and governance of the Central Database of Recovered Assets and the Confiscated and Forfeited Properties Account.

The primary interest is not to restate the statutory provisions but to examine how POCA is implemented in practice. The legal review identifies relevant institutional obligations and develops a framework against which implementation can be assessed. Interpretive questions are presented as such and should not be read as definitive legal opinions where the statutory position is contested or requires authoritative clarification.

3.2.2 Key informant interviews

The second strand comprises qualitative KIIs with purposively selected stakeholders grouped into four categories:

- Anti-corruption agencies (ACAs) / law enforcement agencies.
- Coordinating and oversight institutions.
- Civil society organisations (CSOs) active on asset recovery, and
- Practitioners (legal and financial experts engaged in POCA-related matters).

From these categories, fifteen (15) key informants were selected based on their direct involvement in POCA implementation and their strategic positioning within their institutions. Within each category, potential respondents were identified through an initial stakeholder mapping and selected to ensure coverage of the major institutions while avoiding role duplication. Semi-structured interview guides were developed for each category, covering awareness of POCA and the Regulations, institutional arrangements, asset recovery and management practices, use of the central database, challenges, and recommendations.

Interviews were conducted in person and remotely between 8 March and 23 April 2026, depending on respondents' availability and location. Where feasible, interviews were held in person; otherwise, they were conducted through online platforms or by telephone. Interviews were conducted in English. With informed consent, discussions were audio-recorded; where recording was not permitted, detailed notes were taken. Transcripts were shared with key informants for factual verification and clarification before analysis.

The 15 key informants were selected purposively to provide information-rich perspectives on a bounded implementation question; the sample is not statistically representative of all relevant organisations. Qualitative research guidance emphasises the relevance and depth of cases rather than a fixed sample-size threshold. The findings should therefore be interpreted as an evidence-informed snapshot of the institutions and stakeholders reached during the study period, not as a national compliance census.[39]

[39] (Qualitative Research & Evaluation Methods, 4th ed., esp. ch. 5 on purposeful sampling)

3.2.3 Document analysis and technical review

The third strand consists of a targeted review of institutional and civil society documents, including: internal guidelines and circulars issued by ACAs and the Federal Ministry of Justice; reports and advocacy materials from CSOs monitoring asset recovery; and relevant international guidance.

These sources were used both to corroborate and to nuance interview data and to assess the degree of alignment between formal commitments and operational reality.

3.3 Stakeholder Engagement

Stakeholder engagement was structured around four key actor groups that are critical to the implementation chain of POCA:

- **Anti-corruption agencies (and certain law enforcement agencies)**: officials from specialised proceeds-of-crime or asset management units in the principal ACAs designated under POCA as 'relevant organisations.'
- **Coordinating and oversight institutions**: Representative(s) from the Asset Recovery and Management Unit (ARMU) of the Federal Ministry of Justice, given its role in coordination, reporting and management of the Confiscated and Forfeited Properties Account.
- **Civil society organisations**: representatives of CSOs specifically engaged in monitoring proceeds of crime asset recovery and management, who provide external oversight and independent data on implementation.
- **Practitioners**: legal practitioner(s) directly involved in POCA-related litigation or proceeds of crime asset recovery.

Table 1. Key informants and stakeholder groups

S/No	Key Informants	Stakeholder group
KI1	EFCC-Director, Proceeds of Crime Directorate	Relevant organisation / anti-corruption agency
KI2	CCB-Acting Director, Department of Proceeds of Crime Recovery and Management	Relevant organisation / anti-corruption agency
KI3	NAPTIP-Deputy Director Legal/Prosecution Department & Focal Person for POCA Implementation & Data Entry Officer, Asset and Financial Investigation Unit, Investigation and Monitoring Department	Relevant organisation
KI4	National Drug Law Enforcement Agency (NDLEA)-Assistant Director, Proceeds of Crime Recovery Management	Relevant Organisation
KI5	Nigeria Police Force – Deputy Commissioner of Police and Head of POCA Unit	Relevant Organisation
KI6	Independent Corrupt Practices and Other Related Offences (ICPC) - Assistant Director, divisional head, Asset Management and Disposal (AMD) of Proceeds of Crime Department	Relevant Organisation
KI7	Relevant organisation X (Informal Interview)	Relevant Organisation
KI8	Relevant organisation XX (Informal Interview)	Relevant Organisation
KI9	Relevant organisation XXX (Informal Interview)	Relevant Organisation
KI10	Federal Ministry of Justice/State Counsel at the Asset Recovery and Management Unit (ARMU)	Coordinating and oversight institutions/Relevant Organisation
KI11	HEDA/Chairman	Civil Society Organization
KI12	African Centre for Governance, Asset Recovery and Sustainable Development (African Centre)-Deputy Project Director & Program Officer (Legal/Program)	Civil Society Organization
KI13	21st Century Community Empowerment for Youth & Women Initiative (CEYWI)- Chief Operating Officer	Civil Society Organization
KI14	CLEEN Foundation- Executive Director	Civil Society Organization
KI15	Academic/Law Professor/Expert in Anti/Corruption and Asset Recovery/Practitioner	Practitioner

Source: ANEEJ research design 2026

Within each group, engagement followed a standard protocol. Potential participants were first contacted through formal letters and emails, followed by personalised reminders where necessary. An advanced interview guide was also sent to the participants to enable them to be well prepared, including providing accurate facts during the interviews. During interviews, participants were informed of the study's objectives, potential risks and benefits, and data-handling procedures. Written or verbal informed consent was obtained before any data collection. To protect confidentiality,

responses are reported in an anonymised and aggregated manner, with institutional rather than personal identifiers used where appropriate.

All interview transcripts were imported into a qualitative analysis environment and coded thematically. Initial codes were generated deductively from the interview guides (e.g. “awareness”, “institutional arrangements”, “database use”, “challenges”, “recommendations”) and then refined inductively as new themes emerged (e.g. “informal workarounds”, “capacity constraints”, “inter-agency mistrust”). Themes were then compared across stakeholder groups and triangulated with the legal and documentary evidence to strengthen the credibility of the findings.

3.4 Limitations

The study faced several methodological limitations that should be taken into consideration when interpreting the findings.

First, access to key institutional actors was more constrained than envisaged in the inception report. Despite formal letters and multiple email follow-ups, response rates from some of the relevant organisations were low, and some targeted officials declined or did not respond within the short timeframe of the study. As a result, the KII sample, while still covering the main categories of stakeholders, may underrepresent some institutional perspectives, particularly those of agencies with stricter communication protocols. To address the difficulty of securing access to key institutional actors particularly those who were reluctant to participate without formal approval from senior leadership, we conducted a limited number of informal interviews. Consequently, the organisations concerned are not expressly identified in the list of key informants.

Second, time constraints affected both recruitment and the depth of engagement. The overall consultancy window of 20 working days meant that some otherwise willing respondents could not be interviewed within the period, and that extensive follow-up interviews were not feasible. This limitation is typical of time-bound policy assessments and is acknowledged in the implementation literature as a factor that can limit both sample size and opportunity for longitudinal observation.

Third, the study relies substantially on self-reported perceptions and on institutional documents voluntarily shared with the research team. Where internal data, statistics or SOPs were unavailable, the analysis draws on triangulated interview accounts and civil-society or secondary sources. Triangulation was used to test and contextualise claims, but it cannot fully substitute for access to complete administrative records. Figures such as awareness percentages and database totals should therefore be treated as interviewee estimates or institution-reported figures unless independent verification is expressly stated.

Finally, the findings are an early-stage snapshot of implementation based on interviews conducted between 8 March and 23 April 2026 and documents available to the researchers. Institutional practices, database usage and inter-agency coordination may have changed since then. The study provides a baseline for subsequent monitoring, but it does not constitute a full legal compliance audit, a representative survey or a longitudinal evaluation.

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CHAPTER FOUR:

Legal and Institutional Framework

The Proceeds of Crime (Recovery and Management) Act 2022 (POCA) was enacted to provide a coherent legal and institutional framework for tracing, restraining, forfeiting, and managing assets derived from unlawful activity, and to coordinate the work of Nigeria's numerous anti-corruption and law-enforcement bodies.[40] According to Jemialu, "The visible change between the pre and post the Proceeds of Crime Act, 2022 era, is the presence of a single legal framework, which is the Act, for recovery and management of proceeds of crime."[41] At the most general level, section 1 sets out its purposes: to provide for restraint, seizure, confiscation and forfeiture of property reasonably suspected to be proceeds or instrumentalities of crime; to establish mechanisms for non-conviction-based forfeiture; to strengthen conviction-based confiscation; and to regulate the management and disposal of recovered assets.[42] POCA thus represents Nigeria's most ambitious attempt to consolidate previously scattered confiscation powers into a single, cross-cutting regime and to normalise civil-standard, non-conviction-based forfeiture within the domestic legal order.[43] Section 2 clarifies that the Act applies to the detection, identification, tracing, freezing and recovery of "realisable assets" and proceeds of unlawful activity by "relevant organisations" at the federal level, and to the management of such property once recovered.[44]

Institutionally, a key innovation is the requirement that each relevant organisation establish a Proceeds of Crime Management Directorate or similar dedicated unit. Section 3 provides that every designated body - including the EFCC, ICPC, NDLEA, NAPTIP, the Nigeria Police Force, Nigeria Customs Service, the Code of Conduct Bureau (CCB), and others – must create an internal structure with "exclusive power to take over and assume responsibility for the proper and effective management" of property forfeited to the Federal Government.[45] These Directorates are mandated to set standards for asset handling, maintain statistics and inventories, and ensure accountability in the management and disposal of forfeited assets.[46] It would appear that the drafters deliberately opted for this model to move away from the previous practice in which each agency held and disposed of assets according to its own, often opaque, procedures, with little central oversight.

On the coercive side, POCA establishes a unified set of procedures for restraint and forfeiture. Sections 9 - 16 deal with preservation orders: a relevant organisation may apply *ex parte* for an order preserving property reasonably suspected to be proceeds or instrumentalities of crime, and the court may prohibit any dealing in that property for a specified period, subject to provisions on notice, renewal,

[40] ME Jemialu 'Nigerian Proceeds of Crime Act, 2022: Accountability Deficit on Recovered Proceeds of Crimes' (2022) 8(6) *International Journal of Law* 2
[41] ME Jemialu 'Nigerian Proceeds of Crime Act, 2022: Accountability Deficit on Recovered Proceeds of Crimes' (2022) 8(6) *International Journal of Law* 2
[42] POCA, Section 1
[43] T Onyiuke 'A Critique of the Nigerian Proceeds of Crime (Recovery and Management) Act 2022' (2023) 4(2) *Amicus Curiae* 461-475.
[44] POCA, Section 2
[45] POCA, Section 3
[46] POCA, Section 3(b)

and variation.[47] Sections 17–21 then govern forfeiture orders. Upon application, and subject to procedural safeguards, the court may make an order forfeiting property to the Federal Government where it is satisfied that the property is the proceeds of, or an instrumentality used in, unlawful activity, with the standard of proof aligned to civil rather than criminal thresholds. These provisions codify and generalise a practice that had developed unevenly under sectoral statutes such as section 48 of the ICPC Act and ad hoc asset-recovery regulations; they also bring Nigeria closer to international expectations under the UN Convention against Corruption and the Financial Action Task Force standards, which favour flexible, non-conviction-based confiscation regimes. This shift has important implications for due process and property rights, since POCA allows state recovery even where prosecution is impossible or unsuccessful, while also seeking to balance this with judicial control and defined procedures.

POCA also strengthens conviction-based confiscation by allowing courts, on convicting a person and finding that they have benefited from an offence, to order the confiscation of property representing the value of that benefit, rather than merely property directly linked to the specific transaction. In doing so, it adopts a "value confiscation" model familiar from comparative anti-money laundering practice, making it harder for offenders to shelter gains behind complex asset-holding structures. Where assets have been restrained or forfeited, the Act shifts the focus to management. POCA requires relevant organisations to notify their internal Proceeds of Crime Management Directorate of any such property and to transfer it for centralised management in line with standards and guidelines issued by the Directorate and the Attorney General.[48] The Directorate, in turn, must maintain up-to-date records, keep accurate statistics and data, and oversee decisions about maintenance, sale, or other disposal.[49] The Code of Conduct Bureau's public description of its POCA-mandated department, which includes standard-setting, training and record-keeping functions, illustrates how these responsibilities are beginning to be institutionalised in practice.[50]

A second major structural feature is the central database of recovered assets envisaged by POCA and by related regulations. Building on the 2019 Asset Tracing, Recovery and Management Regulations and earlier efforts by the Ministry of Justice to develop a "central asset register", the Regulation 2024 requires relevant organisations to provide information on seized, frozen, confiscated and disposed assets to a central repository under the Attorney-General's authority. The Global Forum on Asset Recovery's Nigeria progress report had previously documented how fragmented records across EFCC, ICPC, the police, and the Ministry of Justice made it impossible to know, with confidence, what assets had been recovered and how they were being used, thereby creating risks of relooting and undermining public trust. POCA's database provisions are explicitly designed to address these concerns by mandating standardised reporting and the central collation of data. Implementation remains a challenge – civil society monitoring notes that some agencies experience the uploading process as cumbersome and under-resourced – but the legal obligation to report and centralise information marks a significant change in the institutional landscape.

[47] POCA, Section 9-16
[48] POCA, Section 5
[49] POCA, Section 3
[50] CCB 'POCA (Proceeds of Crime & Recovery Management)' available online at https://ccb.gov.ng/?page_id=1184 (accessed 20 March 2026)

The Act also recognises the international dimension of asset recovery. Provisions such as section 67 address cases in which property subject to a Nigerian restraint or forfeiture order is located abroad: in such situations, the relevant organisation, acting under the direction of the Attorney-General, must initiate proceedings – including mutual legal assistance requests – in the foreign jurisdiction to trace, freeze and recover the property. Policy commentary on the original bill emphasised that POCA was intended to complement, rather than replace, Nigeria's mutual legal assistance legislation, by providing the domestic legal basis for orders that foreign courts can recognise and enforce. This link is important because Nigeria's most significant recoveries in recent decades – such as the Abacha-related assets – have involved cooperation with foreign jurisdictions; POCA provides a more consistent platform for such cooperation going forward.

In terms of its relationship with other anti-corruption laws, POCA operates as an overlay rather than a replacement. Before 2022, confiscation and asset-management powers were dispersed across the EFCC (Establishment) Act 2004, the Corrupt Practices and Other Related Offences Act 2000 (ICPC Act), the NDLEA Act, the NAPTIP Act, the Code of Conduct Bureau and Tribunal Act, and various regulations and executive orders. In practice, this produced overlapping mandates, inconsistent procedures and, in some cases, inter-agency conflict over control of high-value assets. Onyiuke argues that POCA seeks to resolve these problems by standardising how proceeds of crime are identified, restrained, forfeited and managed, while leaving the definition of substantive offences and investigative powers to the sectoral statutes.[51] Thus, the EFCC, ICPC, NDLEA, and other bodies continue to investigate and prosecute offences under their enabling Acts. Still, when it comes to recovering and managing assets, they are expected to apply POCA's preservation and forfeiture provisions and to route forfeited property through their internal Directorates and the central database.

This current model is not without controversy. There are debates over whether POCA's provisions are fully compatible with Nigeria's federal structure and with existing asset-sharing arrangements between the Federation and sub-national entities. Nonetheless, many commentators, including PLAC and civil society coalitions working on asset recovery, see the Act as a necessary step towards rationalising Nigeria's asset recovery architecture and aligning it with international standards. Finally, the implementation of the Act must be read against this broader backdrop of institutional history and civil society engagement. The Global Forum on Asset Recovery report and subsequent Nigerian civil society work emphasise that the success of POCA will depend less on the formal design of its provisions than on whether agencies internalise their new responsibilities for data sharing, standards-compliant management, and transparent disposal. Early evidence suggests that not all relevant organisations are yet using POCA systematically, and that the Asset Recovery and Management Unit within the Ministry of Justice and the agency-level Directorates still struggle with capacity, technology and coordination. In that respect, POCA creates a sophisticated legal and institutional framework. Still, its promise - especially the ambition to move from fragmented, discretionary practices to a rules-based, coordinated system - will only be realised if these institutional obligations are enforced and supported over time.

[51] T Onyiuke 'A Critique of the Nigerian Proceeds of Crime (Recovery and Management) Act 2022' (2023) 4(2) *Amicus Curiae* 461-475.

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CHAPTER FIVE:

Key Findings on the Implementation of POCA

Following extensive interviews with stakeholders involved throughout the POCA implementation lifecycle, several key findings emerged in line with the study's aim and objectives. These findings are organised thematically.

5.1 Institutional Compliance with POCA

Institutional compliance with the Proceeds of Crime (Recovery and Management) Act 2022 (POCA) is uneven across Nigerian agencies: some have established functioning Proceeds of Crime units and aligned procedures, while others are still at an early, partial implementation stage. Yet, many others have still not established these units.

POCA requires each "relevant organisation" - including EFCC, ICPC, NDLEA, NAPTIP, the Police, CCB and others – to establish a Proceeds of Crime Management Directorate or equivalent structure to manage seized and forfeited assets. From the interviews and assessments, the picture that emerges is mixed. EFCC has a fully-fledged Directorate of Proceeds of Crime and Recovery Management, evolved from earlier asset-forfeiture structures dating back to 2009 and upgraded in 2017. The directorate has three sections – asset, administration/records, and international asset recovery - and clear internal structures down to zonal units that implement POCA functions nationwide. It operates its own "Eagle Asset Management" database for recoveries, which is linked to POCA reporting. Similarly, the ICPC also established a department immediately POCA was enacted in 2022. Furthermore, NDLEA established a Proceeds of Crime and Recovery Management Directorate in 2023, headed by an assistant director, with desk officers appointed in all commands to work with the directorate. The Nigeria Police Force has created a POCA Unit under the AML/CFT section of the Force CID; the whole section effectively enforces the Act, although staff strength remains modest and key instruments such as SOPs and guidelines are still being developed. NAPTIP is yet to create a full POCA directorate and instead relies on an Asset and Financial Investigation Unit and a small "POCA team" made up of a focal person and data officers; asset and financial investigation officers in 34 commands feed data to headquarters, but this is a transitional arrangement pending the establishment of a full directorate. Likewise, other relevant organisations like National Inland Waterways Authority (NIWA), Standard Organization of Nigeria (SON), Nigeria Ports Authority (NPA) and National Agency for Food and Drug Administration and Control (NAFDAC) are yet to create a department. Some of them are however, in preparatory stages to establish one.

From a civil society and external assessment perspective, interviewees note that, beyond EFCC, ICPC, NDLEA, the Nigeria Police Force, and perhaps CCB, no other agency has really established a robust directorate: many have merely seconded a few staff and lack the real capacity to discharge POCA functions. A 2024 CAPAR-CISLAC assessment finds that around 10 agencies have asset recovery mandates, but the multi-agency model and varying levels of institutionalisation make coordination and compliance difficult. Overall, key anti-corruption agencies (EFCC, NDLEA, NPF, partially NAPTIP, and CCB) have established directorates or units in line with POCA. Still, coverage is incomplete and the depth of institutionalisation varies markedly. It is also important to note that although most

respondents from the relevant organisation do not see a difference between "directorate" and "units", the POCA prescribes the former. Accordingly, full compliance entails establishing a fully-fledged directorate with the necessary workforce, rather than merely a unit with a few staff. In this regard, just a few relevant organisations are fully compliant.

The alignment of procedures with POCA and the 2024 Regulations also shows a spectrum of compliance, especially around tracing, seizure, record-keeping, disposal, and the use of a central database. EFCC appears relatively advanced in this respect. It had SOPs and disposal guidelines before POCA and has updated them to incorporate POCA and the 2024 Regulations, including pre-seizure planning and clear steps for seizure, valuation, disposal, destruction, and the appointment of asset managers. EFCC uses POCA procedures in court to obtain restraint and forfeiture orders, including non-conviction-based orders and structured reporting templates aligned with the Ministry of Justice database. The directorate keeps detailed records of all freezing and forfeiture orders, monetary recoveries, and rent proceeds, with a three-person workflow involving a data officer, the director, and the chairman before uploads to the central database. EFCC describes itself as fully compliant with key POCA requirements, though CSO interviews question whether internal capacity and transparency are as strong as the formal framework suggests.

NDLEA has also made significant progress towards alignment. It has issued internal guidelines and SOPs on custody, reporting, management, and disposal of assets, covering on-the-spot reporting, detailed asset descriptions, custody standards, and disposal rules. The agency uses POCA and the 2024 Regulations for valuation, appointment of auctioneers and reporting, and reports that about 934 properties have been populated into the central database. Its database workflow mirrors the Ministry of Justice requirements, with one officer entering data, a second verifying and a third approving uploads. Officers indicate that POCA has driven major reforms in asset management and disposal practices compared to the pre-POCA regime.

Other agencies show more partial alignment. The Nigeria Police Force historically relied on powers in its own establishing laws, and POCA mainly "strengthens" existing practice by formalising the process for obtaining forfeiture orders and reporting to the central database. The POCA Unit is still developing SOPs and guidelines, and at the time of the interview, these documents were not yet in place. The Police are setting up their link to the central database by opening an official email, nominating three database officers and awaiting access credentials from the Ministry of Justice; returns on finally forfeited assets are being collected from zonal commands and legal units, but the actual population of the central database has yet to start. Awareness and training on POCA are being rolled out through management meetings and AML training, but the NPF itself characterises its compliance with the 2024 Regulation as "not fully" achieved.

NAPTIP has begun to "key into" POCA even though the Act has not yet been fully domesticated within the agency. Asset and financial investigation officers collect data on interim and final forfeiture across its 34 commands, and NAPTIP uses an internal investigation database that includes fields for forfeited assets. That database is not fully operational nationwide: technology, equipment, and training constraints mean it still does not capture all recovery data, and the agency itself recognises it is a "gradual process". NAPTIP has trained desk officers on the NFIU's CRIMS platform to improve financial investigations and sees POCA as a catalyst for shifting from a purely prosecutorial focus to one that

integrates asset recovery. Yet procedures remain only partially aligned: NAPTIP has not finalised a dedicated POCA directorate, specific SOPs, or disposal guidelines, and, despite opening official emails and attending training, it has not been granted practical access to the national central database. The Federal Ministry of Justice, however, confirms that everything that needs to be done on their end to ensure that relevant organisations comply with POCA and its Regulation has been completed.

The consistency of implementation across institutions varies sharply along four main dimensions. First, organisational maturity and awareness differ considerably. Awareness of POCA and the 2024 Regulations in EFCC is described as "very high" (about 90%) at headquarters and zonal offices, with functional units in every zone. NDLEA estimates awareness of POCA at about 60% across the agency and almost 100% in the legal department, reflecting its recent creation of a specialised directorate. NAPTIP, by its own assessment, has an awareness level of only about ten per cent, and many officers first encountered POCA when they were asked to submit returns on recoveries. The Police are somewhere in the middle, with awareness growing through AML trainings and management briefings, but still largely confined to the specialised units. This means that POCA is institutionally "owned" in a few agencies and remains peripheral knowledge in others.

Second, there are differences in the depth of functional integration. EFCC already had an asset recovery structure before POCA, so the Act essentially consolidated and regularised existing practices; as a result, EFCC could quickly integrate POCA provisions into its casework and internal SOPs. A similar situation is the case of ICPC. NDLEA reports that POCA has materially changed its practice. Every arrest now triggers efforts to trace assets as proceeds or instrumentalities of crime, and asset management and disposal are more systematic and time-bound. The Police emphasise that POCA "strengthens" rather than transforms their legal powers, and their internal processes are still catching up with the more demanding reporting and data requirements introduced by POCA. NAPTIP (and Relevant Organisation X) remains in a preparatory phase, focusing on creating focal points, securing management buy-in and resources, and building a bridge between its own investigation database and the POCA central database in the future.

Third, there is uneven compliance with reporting and database obligations. EFCC and NDLEA are actively loading data into the ARMU central database, using three-officer controls in line with the Regulations. The Police have designated officers and begun collecting returns on finally forfeited assets but had not yet secured access to the database or begun actual uploads at the time of their interview. NAPTIP has undertaken training, opened official emails, and submitted necessary documentation, but is still waiting for access, so it has not yet started populating the system. From the perspective of external observers, these asymmetries yield an opaque picture of national recoveries: the CISLAC assessment notes that no agency currently provides regular, public updates on the volume and use of recovered assets.[52] This fact seems to be partially confirmed by officials from the ARMU of the Federal Ministry of Justice, who stated that, so far, only NDLEA and CCB have a very

[52] CISLAC *Common African Position on Asset Recovery: Implementation in Nigeria* available online at https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (accessed 20 March 2026) 8, 10–11

high level of compliance with their national central database obligations under the POCA Regulations, 2024.

Taken together, the evidence from key informant interviews and recent assessments suggests that Nigeria has moved from a fragmented, largely discretionary regime to a more structured POCA framework, but institutional compliance remains stratified. A first tier of agencies, especially EFCC, ICPC and NDLEA, broadly comply with the Act's and Regulations' architecture; a second tier, including the Police and NAPTIP, is still building units and procedures; and a third tier of "relevant organisations" exists mainly on paper. The resulting landscape is functional but inconsistent, with significant room for stronger coordination, more robust resourcing and clearer enforcement of common standards.

5.2 Asset Recovery Practices

Under the Proceeds of Crime (Recovery and Management) Act 2022, the formal cycle of asset recovery in Nigeria is clearly spelt out on paper: assets should be traced, seized, preserved, forfeited through conviction-based or non-conviction-based procedures, and then managed through specialised directorates within each relevant organisation. In practice, however, the material from agencies and civil society points to a pattern where the law is ahead of practice at almost every stage, creating significant implementation gaps.

On tracing, POCA seeks to normalise asset-focused investigations rather than treating confiscation as an afterthought to criminal prosecution. The NDLEA interview captures this shift quite clearly: before POCA, "not much attention was given to tracing of assets", whereas now "on every arrest made, efforts are made to trace assets whether as proceeds of crime or instrumentality of crime". EFCC and ICPC had already institutionalised asset tracing and simply folded its existing practices into the new framework. By contrast, the Police and NAPTIP are still migrating from case-driven to asset-driven investigation cultures. The Police emphasise that their tracing powers predate POCA and that the Act mainly "strengthens" what they were already doing, suggesting that investigative routines have not been systematically reengineered around asset recovery. NAPTIP only recently began to build a financial investigation culture, leveraging NFIU's CRIMS database and training desk officers to request financial and asset information. Still, awareness of POCA is low, and tracing remains uneven across its 34 commands. At the systemic level, the CISLAC notes that Nigeria still lacks a coherent, updated national asset recovery strategy, so tracing priorities is not anchored in a single, shared policy framework.

When it comes to seizures, POCA and the ACJA provide detailed powers to seize property and cash reasonably suspected to be proceeds or instrumentalities of crime, including cash movements above certain thresholds. EFCC, NDLEA, and the Police routinely obtain seizure and restraining orders, and designated officers in agencies such as Customs, NDLEA, EFCC, and the Police may detain cash where there is reasonable suspicion. Yet there are still gaps in pre-seizure planning and in consistent application of safeguards. Ayinde demonstrates that, even after the enactment of POCA, Nigeria still lacks a unified, cross-agency standard for determining when it is economically justifiable to seize an

asset and how to balance storage, security, and maintenance costs against its likely forfeiture value.[53] Prior to POCA, the statutory frameworks governing agencies such as the EFCC, ICPC, NDLEA granted broad seizure powers but provided limited guidance on the management of perishable or complex assets, resulting in wastage, deterioration, and allegations of misuse. POCA improves this by linking seizures to subsequent preservation orders and asset management duties, but it does not itself embed a mandatory, detailed pre-seizure planning requirement across all agencies. This is only provided for the Regulation. As a result, agencies still approach seizure decisions unevenly, and some of the older habits persist.

Preservation is the point at which the gap between POCA's architecture and what agencies do becomes most visible. The Act allows relevant organisations to seek *ex parte* preservation orders, which can last up to sixty days and be renewed to a cumulative maximum of 180 days.[54] It explicitly contemplates the sale of perishable or rapidly depreciating assets, with proceeds invested in CBN instruments pending final determination. It also authorises courts to direct the appointment of asset managers and even to order the continued operation of businesses under preservation.[55] EFCC, ICPC and NDLEA seem to have internalised these provisions better than others. ICPC and NDLEA have drafted SOPs and templates requiring detailed "on-the-spot" reporting when seizures are made and guidelines on custody, reporting and disposal designed to preserve value and avoid waste. Nonetheless, the legal analysis and CSO assessments emphasise that POCA still contains blind spots: it is more elaborate on preserved and forfeited assets than on the management of seized assets before a preservation order is in place, and it leaves key phrases, such as "soon thereafter" for notification of seized property, undefined, which opens space for delay and discretion. The absence of a single coordinating body to standardise preservation practices across more than a dozen "relevant organisations" means that some agencies continue to improvise, with inconsistent documentation, variable quality of asset records, and, in some cases, continued risk of informal use of seized property.

Forfeiture, both conviction-based and non-conviction-based, is arguably the strongest point in the Nigerian framework in terms of legal design, but implementation still raises questions. POCA codifies an extensive non-conviction-based regime, with a civil standard of proof, a wide scope for targeting proceeds and instrumentalities of crime, and the possibility of multiple preservation and forfeiture orders arising from the same unlawful activity. EFCC, ICPC and NDLEA report that they are actively using POCA to obtain restraint and forfeiture orders, and NDLEA's legal department applies POCA "daily" in court. However, civil society and academic commentators caution that the non-conviction provisions shift the burden of proof onto respondents to justify their assets and allow forfeiture orders to survive even if the linked criminal proceedings end in acquittal, which may be challenged on constitutional grounds and could engender judicial resistance. In addition, judges are still adjusting to the logic of non-conviction-based forfeiture. The NDLEA mentions pushback from some judges who are uneasy about confiscating assets without prior conviction on human rights grounds. These tensions can translate into delays in issuing final forfeiture orders and certified copies, which in turn slow down entries into the central database and timely disposal. At a systemic level, the CISLAC report underlines that, despite the volume of domestic and external forfeitures achieved over the last two

[53] DJ Ayinde '*An appraisal of the legal and institutional frameworks for the management of seized and forfeited assets in Nigeria'* (2025) 28(7) *Journal of Money Laundering Control* 17
[54] POCA, Sections 11 & 12
[55] POCA, Section 14

decades, Nigeria still lacks a live, public, consolidated picture of what has been finally forfeited, which makes it difficult to assess the effectiveness of the forfeiture regime in practice.

The management of assets after seizure and forfeiture is the area where POCA promises the most but still delivers least consistently. The Act establishes Proceeds of Crime Management Directorates in all relevant organisations, obliges agencies to notify these directorates of any seized property within fourteen days, mandates the transfer of forfeited assets to the directorates within thirty days, and creates a Confiscated and Forfeited Properties Account at the Central Bank of Nigeria to receive proceeds of sale and cash forfeitures. EFCC's directorate is relatively mature, with three sections, a dedicated database, SOPs, disposal guidelines and a structured three-person workflow for uploading to the Ministry of Justice's central database. NDLEA has also created a directorate, drafted SOPs and populated the central database with hundreds of properties, although it struggles with backlogs, network problems and resource constraints. By contrast, agencies such as NAPTIP and the Police are still in the process of building or operationalising their directorates, drafting SOPs and securing access to the central database. The CAPAR assessment stresses that, even where directorates exist, transparency and external accountability remain weak: records in the central Confiscated and Forfeited Properties Account are not publicly accessible, there is no regular public reporting on the volume and use of recovered assets, and citizens largely learn about "big" recoveries through sporadic press statements rather than systematic disclosures.

In sum, tracing, seizure, preservation, forfeiture, and asset management are all better regulated than before 2022, and leading agencies have begun to embed these stages into their practice. Still, asset recovery in Nigeria remains a work in progress. The Act has created a sophisticated skeleton; the flesh of consistent implementation, cross-agency coordination, resourcing, and transparency has yet to grow around it fully.

5.3 Inter-Agency Coordination

Inter-agency coordination under POCA is formally anchored in the Attorney General's Asset Recovery and Management Unit and the central database. However, the interviews show that coordination on the ground is still uneven, personality-driven and constrained by overlapping mandates and weak information flows. Agencies are slowly building routines for information sharing and reporting obligations, yet the system remains fragmented, prone to duplication, and rife with gaps.

From the perspective of information sharing, there is a clear distinction between formal channels and how things work in practice. The Police POCA unit emphasises "good coordination with the Ministry of Justice" and regular recourse to EFCC for forensic analysis, and to CCB for access to asset-declaration forms, using specific letters that cite the Police Act and other enabling laws; information movements here are still largely paper-based and driven by requests rather than automated, routine data exchange. CCB's new Proceeds of Crime and Recovery Management department describes a more structured approach: it has an MOU with EFCC and ICPC that expressly covers the exchange of asset declaration information, and it is beginning to participate in joint asset tracing work with a new forensic accounting and financial intelligence unit within the Bureau. At a wider system level, CSO interlocutors note that NFIU-convened platforms and the TUGAR-led Inter-Agency Task Team have helped agencies "talk to themselves now in terms of intelligence

sharing", so that EFCC, ICPC, NFIU and others can route cases and intelligence to the most appropriate body instead of hoarding information. Nonetheless, some civil society organisations stress that sharing is still selective and uneven: information flows are much stronger around high-profile, externally monitored cases (such as Abacha returns) than around day-to-day domestic recoveries, and there is no culture yet of real-time, multi-directional sharing through the central database.

The interviews also show that overlapping mandates remain a structural source of coordination stress. CCB, EFCC, ICPC, the Police, NDLEA, and other bodies all have some form of tracing, seizure, or forfeiture power, and POCA opted for a decentralised model in which each establishes its own Proceeds of Crime Management Directorate. The CCB describes practical overlap even inside her own organisation: investigations and legal units continue to "do what they are used to doing", and the new POCA department has had to sensitise colleagues to relinquish aspects of tracing, seizure and management. CSO informants go further to argue that decentralisation entrenches rivalry: agencies are reluctant to hand over management of assets they traced and prosecuted to another institution, and each prefers to retain control of "its" assets and the associated visibility. One CSO interviewee regards this as the predictable consequence of rejecting the original civil society proposal for a single central asset management agency, warning that, with directorates scattered across more than ten bodies, mandates will continue to overlap and coordination will depend heavily on the goodwill of current leadership rather than on a clear institutional hierarchy.

Coordination failures appear in several concrete ways across the testimonies. First, despite the Attorney General's nominal coordinating role, ARMU is described as focusing more on negotiating and monitoring MOUs with foreign partners than on day-to-day domestic coordination of POCA implementation. In internal asset recovery, one CSO leader notes that "coordination still lags", with ARMU's database heavily skewed toward external returns and offering little granular, accessible information on domestic cases such as Alamieyeseigha, Jonathan, -linked assets or recent CBN-related forfeitures. Second, coordination platforms like TUGAR's asset recovery working group and the Inter Agency Task Team exist and have produced guidance and scoping studies. Still, their link to POCA implementation is not yet tight: their work pre-dates POCA and now needs to be "strengthened to work closely" with the new legal framework, rather than operating on parallel tracks. Third, civil society actors still see pockets of duplication and siloed work. While some CSO interviewees acknowledge genuine progress – citing examples where EFCC now refers administrative corruption cases to ICPC and vice versa – they also emphasise that over 20 agencies are still involved in asset recovery, and that coordination is "poor" in many routine matters. That duplication has reduced but not disappeared.

Reporting obligations and the central database are the most visible attempts to formalise coordination, but here too, implementation is uneven. The Police POCA unit describes the 2024 Regulations as requiring returns "only on finally forfeited assets", with a three-officer workflow for data entry: one inputs, a second verifies, and a third approves and transmits to the Ministry of Justice; however, at the time of interview, the unit was still waiting for official email addresses and access codes, and could only begin populating the system, after sending letters to zonal commands, once those bureaucratic hurdles were cleared. CCB's POCA department presents itself as an early compliance "success story": it has designed its internal database around the Attorney-General's template, captures interim orders as well as final forfeitures, and has already received a

commendation for timely, accurate returns to the central database. NDLEA reports that it has uploaded around 934 properties but faces serious backlogs and technical constraints: older court orders and case files are hard to retrieve, connectivity to the portal is unreliable, and there are too few computers and trained staff to keep pace with the volume of cases. From the outside, civil-society actors confirm that the ARMU portal exists and is, in principle, accessible. Still, they criticise its narrow coverage (focusing mainly on external assets), the absence of detailed information on domestic forfeitures and utilisation, and the lack of user-friendly public reporting; in their view, this undermines both transparency and the database's coordinating potential.

Despite these weaknesses, several interviewees point to modest but real improvements in coordination. CSO representatives note that outright “turf wars” between EFCC and ICPC over the same case have become rarer, that anti-corruption agencies now meet more regularly with civil society and the media in stakeholder fora, and that joint investigation or asset-recovery teams are beginning to be discussed in MOUs, particularly between CCB and EFCC. However, they consistently link further progress to three unresolved issues: clarifying roles in law and practice to reduce overlap; strengthening ARMU or an alternative hub to provide genuine strategic coordination of POCA implementation; and broadening the reporting and database regime so that it supports not only upward reporting to the Attorney-General, but also lateral coordination among agencies and meaningful public oversight.

5.4 Implementation of the POCA Regulations, 2024

Across the key institutions, the POCA Regulations, 2024 are being implemented gradually and unevenly: awareness is high in a few lead agencies, moderate or low elsewhere, and internal procedures are at different stages of development and adaptation. The interviews suggest a picture of “progress with gaps”, where regulators and civil society see the regulations as useful but still insufficiently internalised across the system.

In terms of awareness, EFCC clearly sits at the top of the curve. Its Director of Proceeds of Crime and Recovery Management estimates awareness of both POCA and the 2024 Regulations at about 90 per cent across headquarters and zonal offices, with dedicated units in each zone applying the Regulation in their daily work. NDLEA presents a more mixed picture: awareness of POCA within the agency is put at around 60 per cent overall, “almost 100” in the legal department, but noticeably weaker in commands because the directorate itself was only created in 2023 and sensitisation is still ongoing. At the Police, the head of the POCA unit confirms that the Regulations are discussed at management and AML/CFT training sessions and insists that the Force is “complying but not fully”, reflecting a work-in-progress level of awareness that depends heavily on internal training yet to be rolled out widely. Within the CCB, the POCA department head notes that awareness at headquarters is about 70 per cent, and at the state level, about 60 per cent, and that the Regulations are known at least to the staff involved in asset recovery and reporting. However, she also notes that the department is barely a year old and is still securing institutional buy-in. From the civil-society side, some stress that, outside a small circle of practitioners, awareness of both POCA and the Regulations is “very low”, with fewer than one in ten citizens encountered in their work able to identify the law or its content.

Adoption of internal procedures closely tracks these different starting points. The EFCC had an asset forfeiture directorate and disposal guidelines well before POCA, so the Commission has mainly used the Regulations to refine and formalise existing practice. The Director reports that pre-seizure planning, seizure sequencing, preservation and disposal, and the engagement and supervision of asset managers and auctioneers have all been incorporated into updated SOPs and a revised asset-disposal guideline aligned with the Regulations. EFCC has also adjusted its reporting templates so that its Eagle Asset Management database mirrors the fields required by the Ministry of Justice's central database, with a three-step workflow (upload, verification by the Director, final approval by the Chairman) designed to ensure data quality. NDLEA's directorate, by contrast, has had to build almost everything from scratch: it has drafted SOPs on "on-the-spot" reporting when seizures occur, custody and security of assets, and disposal procedures, and has submitted these for management approval. The Regulations have also forced NDLEA to tighten record-keeping and valuation practices, since assets cannot be uploaded to the central database without key data such as suit number, date of final forfeiture and proper description, which in turn has required the creation of templates and the appointment of three officers to handle input, verification and approval. At the CCB, internal procedures have been consciously modelled on the Attorney-General's reporting framework: the Bureau has built its own database "around the Attorney-General's requirements", added more detailed internal fields to include interim orders, and assigned an asset-management unit and exhibit keepers to document seizures and forfeitures before the Head of Department authorises central-database uploads. The Police POCA unit, by contrast, acknowledges that it does not yet have formal SOPs, and that procedure development is following, rather than leading, training: officers are still being trained, and the unit is only just setting up the three-officer reporting structure demanded by the Regulations, pending the issuance of official emails and access credentials.

Beyond awareness and procedures, the interviews highlight several cross-cutting themes that shape the level of implementation of the Regulation. First is the central-database and reporting obligation. A few of the relevant organisations recognise the obligation to report finally forfeited assets to the central database and have identified specific officers or units to handle this. EFCC and CCB present themselves as up to date, NDLEA as catching up but burdened by backlogs and IT constraints, and the Police as still completing the basic technical steps required to gain access. On the part of ICPC, it complains that the obligations under the Regulations are unclear which makes faithful implementation a challenge. Second is capacity and resources. NDLEA candidly lists the challenges of entering historical cases, retrieving old, certified court orders, unreliable connectivity to the portal, and shortages of computers and trained staff, and calls for increased budgetary allocations and further capacity-building. CCB's POCA department similarly identifies funding, equipment, and electricity as the main bottlenecks, even as it points to donor-supported training as an important mitigating factor. EFCC notes that even there, where structures are comparatively strong, asset management and database maintenance require software licensing, logistics, and specialised staff, suggesting that full implementation of the Regulations is resource-intensive even for the best-resourced agency.

Finally, from the vantage point of civil society, the Regulations are seen as a positive step that strengthens POCA's implementation but still require much more intentional dissemination and engagement. One CSO considers the Regulations as "very fine" and helpful in reducing conflict and ambiguity in day-to-day practice, but argues that the Ministry of Justice must do far more to bring both the Act and Regulations into public view, and to ensure that the reporting and database regime

translates into usable information and meaningful accountability. On this reading, the 2024 Regulations have been taken up seriously by a handful of core agencies, partially internalised by others, and barely perceived by the broader ecosystem of practitioners and citizens, leaving considerable work to be done before they function as a genuinely system-wide implementation instrument.

Across agencies, there are common procedural gaps, especially around the national central database and record-keeping. EFCC and NDLEA content are actively being populated into the central database. Still, both acknowledge practical challenges such as network issues, backlogs of historical cases, and delays in obtaining certified court orders. By contrast, NAPTIP and the Police are still at the stage of securing access and setting up their internal systems, so the systematic reporting envisaged by the Regulations has not yet taken shape. CISLAC's 2024 assessment notes that, despite POCA's requirements on record-keeping, citizens cannot easily access comprehensive information on recovered assets, and no agency provides regular, public, consolidated reporting. A broader issue is guidance, oversight and coordination. The Act decentralises asset management to directorates inside each agency and does not designate a single coordinating body; scholars and civil society organisations regard this as a structural weakness that produces overlaps, siloed practices and weak accountability. The Asset Recovery and Management Unit (ARMU) in the Ministry of Justice maintains the central database and coordinates some international returns. Still, its effective remit is narrower than that of a full central manager, and CSO informants say it focuses more on external assets and MoUs than on day-to-day domestic implementation.

5.5 National Central Database of Recovered Assets

Compliance with the POCA Regulations's National central database requirement is partial and uneven. Relevant organisations know about the database and are feeding it, but coverage is narrow, quality is inconsistent, and public-facing transparency remains limited.

From the institutional side, awareness of the national central database within key "relevant organisations" is reasonably high. EFCC, ICPC, NDLEA, CCB, and the Police all describe the database, understand that only finally forfeited assets should be reported, and have created three-person workflows (input, verification, approval) in line with the Attorney General's Regulations. EFCC presents itself as a high-compliance user: its Proceeds of Crime directorate has desk officers who key in returns from zones, a detailed template aligned to the ARMU portal, and a practice of uploading as soon as forfeiture orders are obtained. NDLEA reports that it has already populated "about 934 properties," but also notes that older cases are difficult to reconstruct, network problems frequently block access to the site, and there are too few computers and trained staff to keep up with the backlog. CCB's POCA department has built its internal database "around the Attorney-General's requirements", captures interim orders in-house, and then uploads final forfeitures within 24 hours of receiving court orders. By contrast, the Police POCA unit is still in the process stage: it has written to force headquarters for official email addresses so that ARMU can issue access codes, has begun collecting returns from commands, but admits it is "complying but not fully". The ARMU of the Federal Ministry of Justice, however, in rating the level of compliance among relevant organisations in 1-10, with 10 being the highest score, has this to say: "Rating them between 1-10, EFCC -3, ICPC -3, Customs-2, NDLEA-8, NAPTIP-1, Nigeria police -1, CCB-9, Customs-1."

Civil-society perspectives deepen this picture and question how far the database serves its transparency and coordination purposes. One CSO confirms that the ARMU central database "has been established" in the Ministry of Justice, but immediately asks "how popular it is", stressing that very few Nigerians know about it and that it has been built primarily around external (internationally returned) assets. In its account, major domestic forfeitures - examples he gives include the Alamieyeseigha case, Mrs Jonathan's properties, and flats linked to the former CBN Governor - do not appear with usable detail in the portal, so the public still learns about them mostly from newspaper stories rather than from the official database. It argues that this selective coverage undermines the coordinating and deterrent effect POCA envisaged and calls for the database to be expanded to comprehensively reflect both internal and external recoveries, including information on intended utilisation. Another CSO also acknowledges the existence of the database and broader improvements in disclosure but describes the information as "there" yet not "abundant and sufficient". For it, the key challenge is balancing national security concerns with meaningful disclosure: he opposes dumping "every data" online, but insists that substantial, reliable information on recovered assets and their use must be proactively shared, while other CSOs fill gaps through their own asset-monitoring websites.

On access, one CSO suggests a stratified reality: the ARMU portal is "accessible" to practitioners working on asset recovery and who know how to log in, but there is no indication of open, user-friendly public access comparable to budget portals. Instead, wider civil society relies heavily on Freedom of Information requests and ad hoc stakeholder meetings to obtain data on recovered assets and their deployment. One CSO lists only a small cluster of organisations (ANEEJ, 21st Century CEYWI, CLEEN, BudgIT, CODE, PPDC) that consistently request and interpret such information, highlighting both a capacity gap in the CSO sector and the absence of a formal, legally entrenched channel for public monitoring of the database. Another CSO describes a two-track approach: cooperative, project-based sharing on the "supply side" when CSOs are contracted as monitors, and coalition-based demand using FOI, town halls, and public accountability sessions to press agencies to disclose more on recoveries and utilisation.

Taken together, the interviews suggest that formal compliance with the national central database requirement is relatively advanced among a core group of agencies, but substantive compliance with its transparency rationale remains weak. On the state side, the database is primarily seen as an internal coordination and reporting tool for the Attorney General, with patchy coverage of domestic forfeitures, uneven data quality, and serious resourcing constraints in some agencies. The ARMU of the Federal Ministry, however, has quite a different perspective. While acknowledging the challenges in operating the database, relevant organisations must also do their part to support the initiative. On the societal side, access is effectively limited to a small epistemic community of anti-corruption CSOs who know the portal and use FOI and advocacy to extract additional data. At the same time, ordinary citizens have little direct visibility of the database or of systematic, periodic reports on assets recovered and their use. This gap between legal design and lived transparency is precisely where civil-society informants locate the next phase of POCA implementation: expanding the scope and usability of the ARMU database, clarifying what can safely be disclosed, and institutionalising CSO and media engagement so that the central database becomes not only a compliance box for agencies, but a meaningful public-accountability instrument.

5.6 Transparency and Accountability

Across the interviews, transparency and accountability emerge as the weakest dimension of POCA implementation. The law and regulations exist, but citizens' ability to trace assets and trust their use remains limited.

On public traceability, CSOs draw a sharp contrast between a few high-profile, internationally monitored cases and the wider universe of domestic recoveries. One CSO describes Abacha-3 as a "model" case: the MOU required civil society monitoring to monitor disbursements to three legacy projects (Lagos–Ibadan Expressway, Second Niger Bridge, Abuja–Kano Road). The CSO published detailed reports and field-based evidence of how the funds were spent. By contrast, another CSO notes that for many domestic cases - Alamieyeseigha, Mrs Jonathan's properties, forfeited assets linked to former CBN Governor Emefiele – the only accessible information is media coverage; citizens cannot go to the central database and see clear entries showing the assets, their value and their eventual utilisation. He emphasises that the ARMU portal focuses heavily on external returns and lacks granular, accessible data on internal forfeitures, leaving most recovered assets not yet publicly traceable in a meaningful, systematic way.

On reporting systems, agency interviews show formal structures but uneven effectiveness. EFCC, NDLEA, CCB, and the Police all describe three-tier reporting chains to the central database (data entry, verification, approval), and EFCC portrays its Eagle Asset Management system as detailed and up to date. NDLEA has reportedly uploaded about 934 properties and acknowledges that the Regulations have improved its record-keeping discipline, even if technical and archival challenges persist. However, one CSO underlines that reporting into ARMU is only one part of "effective" reporting: while the central database exists and is functional, it is little known outside specialised circles, skewed toward external assets, and not backed by regular, user-friendly public reports on what has been recovered and how it is being used. Another CSO adds that, although information "is there" and agencies now engage periodically in public accountability sessions, the volume and clarity of official disclosures remain insufficient, forcing CSOs to combine FOI requests, coalition pressure, and independent research to piece together a fuller picture.

On safeguards against re-looting**,** interviewees see POCA as a major normative advance but question how far practice has caught up. One CSO argues that, before POCA, agencies could dispose of assets "the way they like". In contrast, the Act and Regulations now impose disposal procedures, centralise proceeds in designated accounts, and establish a benchmark for negotiations with foreign partners. It cites recent EFCC-led disposal exercises, conducted under the Public Procurement Act with public advertisement and CSO observers, as evidence of improved safeguards at least for large sales. Yet it also flags significant gaps: the absence of a single central asset management agency leaves fragmented control and rivalry between institutions, which, in his view, increases the risk of opaque utilisation and weak oversight over proceeds. Another CSO, drawing on its monitoring of Abacha-3, underscores that independent civil-society verification and community-level engagement were crucial in preventing diversion and building trust, implicitly suggesting that, where such mechanisms are absent, safeguards against re-looting remain fragile. Both informants, therefore, link stronger anti-re-looting protection to three elements that are only partially in place: comprehensive, publicly usable data on all

recoveries; institutionalised CSO participation beyond isolated flagship projects; and clearer, more coordinated governance of asset management and utilisation across agencies.

5.7 Civil Society and Public Oversight

Civil society has become a central, if still relatively small, watchdog constituency for POCA implementation, especially regarding asset recovery, utilisation, and transparency. The interviews show a core cluster of organisations (ANEEJ, 21st Century CEYWI, CLEEN, BudgIT, CODE, PPDC, African Centre) that consistently engage the law, monitor specific recoveries and push agencies and the Ministry of Justice toward fuller implementation.

In terms of effectiveness as watchdogs, two CSOs emphasise that CSOs helped to secure POCA's passage, now use it as a reference point in advocacy, and have shaped practice in landmark cases. CLEEN describes how their monitoring of the Abacha-3 return - covering engineering quality, spend analysis, procurement compliance, and human rights safeguards on the Lagos-Ibadan, Second Niger Bridge, and Abuja-Kano projects - forced a higher standard of accountability and built trust between government and citizens. Another CSO similarly cites CSO participation in designing and monitoring MOUs for later Abacha returns, and in ARMU-convened processes around the central database, as evidence that civil society can influence how recovered assets are managed. At the same time, he stresses that only a handful of groups actually specialise in proceeds of crime monitoring; most Nigerian CSOs still focus on general budget work, leaving significant oversight gaps.

Public oversight more broadly remains partial and uneven. One CSO highlights that ordinary citizens rarely know POCA, still less the Regulations; in their field engagements, "not 10" of participants recognise the law, which limits bottom-up pressure on agencies. Another CSO notes that the ARMU central database exists and is, in principle, accessible to practitioners, but is not widely known or used by the public and does not yet provide full, comprehensible information on domestic recoveries and utilisation. Both informants describe FOI requests, town hall meetings, stakeholder dialogues, and public "accountability sessions" (where EFCC, ICPC, the Ministry of Justice, and the Ministry of Finance present updates) as emerging tools of public oversight, but they still see these as episodic rather than institutionalised.

The relationship between civil society, state oversight actors, and the relevant agencies is depicted as largely cordial, with more structured engagement than in the pre-POCA era but also marked by clear power imbalances. One CSO reports that agencies generally attend CSO-convened forums, share information on request within agreed boundaries, and have accepted civil society monitors in sensitive programmes such as the Abacha-funded social safety net and infrastructure projects. Another CSO confirms regular "stakeholder engagement" meetings with the Ministry of Justice, Finance, ARMU, and anti-corruption agencies, and notes that bodies like TUGAR's Inter-Agency Task Team now routinely involve CSOs in technical working groups on asset recovery and safe reporting. Both, however, underline that this cooperation depends heavily on political will and personal relationships; access is easier for well-established organisations with long histories of working with, for example, the Police or EFCC, while smaller groups often struggle to obtain timely information or a seat at the table.

Overall, the interviews portray civil society as an increasingly recognised partner and watchdog in POCA implementation, but one whose reach and leverage are still constrained by limited numbers, uneven public awareness, and the absence of legally entrenched, routine mechanisms for CSO and citizen oversight of recovered assets.

5.8 Summary of agency-level implementation status

The following matrix summarises the position described by interviewees at the time of data collection. It is a synthesis of reported institutional status, not an independent audit or a definitive ranking of agencies. Status may have changed after the interviews.

Relevant organisation	Structures and procedures reported	National central database status reported	Main implementation issue reported
EFCC	Established proceeds-of-crime directorate; existing asset-forfeiture arrangements and SOPs described as updated.	Interviewee described an active reporting workflow and internal database aligned with central reporting fields.	Maintaining data quality, resources and consistent system-wide reporting.
NDLEA	Directorate established; SOPs and reporting templates developed or being operationalised.	Interviewee reported approximately 934 properties entered; this figure was not independently audited by the study.	Historical records, certified court orders, connectivity, hardware and staff capacity.
CCB	A proceeds-of-crime and recovery-management department has been established; internal procedures and records described.	Interviewee described a reporting workflow and timely uploads of final forfeitures.	Departmental maturity, resourcing, equipment and electricity.
Nigeria Police Force	POCA unit designated; collection of returns and development of procedures were reported as ongoing.	At the interview date, the unit reported that access credentials were still pending and routine uploads had not commenced.	Access to the database, staffing, resources and completion of SOPs.
NAPTIP	Asset and financial investigation structures, internal database work and training were reported.	At the interview date, the agency reported that central-database access was still pending.	IT infrastructure, access, resourcing, internal data completeness and staff awareness.
ICPC	Asset-management and disposal responsibilities were identified; implementation issues were discussed in the interviews.	The report does not establish a sufficiently verified, comparable upload count or status for inclusion here.	Clarification of reporting obligations and consistency of implementation.

Source and qualification: Key informant interviews conducted between 8 March and 23 April 2026. Statements about agency status reflect interviewee accounts and documents made available to the researchers. The study did not independently audit agency databases or verify every reported figure.

CHAPTER SIX:

Cross-Cutting Implementation Challenges

The findings indicate that POCA represents an important legal and institutional development, but implementation remains uneven. The challenges cut across legal interpretation, institutional coordination, technical systems and human and financial capacity. The evidence below is drawn principally from key informant interviews and the documents available to the research team; reported experiences may differ across institutions and over time.

Legal challenges

In the anti-corruption landscape in Nigeria, most commentators overwhelmingly commend the enactment of the POCA as a laudable piece of legislation. However, this does not mean the POCA is a perfect piece of legislation. There are still legal challenges associated with it.

Some KIs suggest that POCA and its Regulations sit atop a dense legal landscape that is not yet fully harmonised, creating friction and uncertainty in day-to-day implementation. NAPTIP's representative identifies a clear example: section 67 of the NAPTIP Act dedicates 5 per cent of seized funds to a Victims of Trafficking Trust Fund for compensation and the running of shelters, but POCA contains a supremacy clause stating that any law inconsistent with it is overridden. She warns that if POCA is applied literally without careful amendment, a long-standing victim-support mechanism could be undermined, despite the Act's broader commitment to victim compensation. This highlights a more general legal challenge: how to reconcile sector-specific asset-related provisions in existing laws (e.g., the NAPTIP Act, the NDLEA Act, agency-specific forfeiture powers) with POCA's central framework in a way that preserves legitimate special regimes without creating contradictions.

There are also other structural gaps in POCA itself. For example, section 3(1) requires each "Relevant Organisation" to establish a Proceeds of Crime Management Directorate and empowers them to "take over and assume responsibility" for forfeited property. In contrast, section 3(c) allows each agency to set up its own disposal system. With at least 18 agencies holding asset-recovery powers, this decentralised design has produced a patchwork of asset-management regimes with no statutory uniform standard, making it harder to ensure consistent safeguards and potentially fuelling inter-agency rivalry. This is an institutional coordination issue which will be examined in more detail in the next section.

A further legal lacuna concerns the lack of sufficient safeguards for transparency and accountability. For example, Jemialu points out that POCA lacks provisions on "safeguards against arbitrary use of these provisions for purposes of personal, political or tribal vendettas by the relevant organisation's officials or the government".[56] Similarly, in the appointment and oversight of private asset managers, valuers and auctioneers, the Act authorises directorates to appoint such providers. It requires

[56] ME Jemialu 'Nigerian Proceeds of Crime Act, 2022: Accountability Deficit on Recovered Proceeds of Crimes' (2022) 8(6) *International Journal of Law* 4

proceeds to be lodged in a specialised account at the CBN, but it is silent on transparent, competitive procedures for selecting those accounts. Agencies have therefore defaulted to the Public Procurement Act as a guide; however, there are suggestions that POCA should be amended to codify minimum procedures and oversight requirements for disposal to prevent conflicts of interest and abuse.

Victim restitution under section 70(c) is another point of concern. The provision allows the President, subject to Federal Executive Council approval, to authorise expenditure from the Confiscated and Forfeited Properties Account to compensate a person who has suffered grave pecuniary loss arising from the relevant offence or conduct. Interviewees raised concerns about the predictability and timeliness of this process. The study records these concerns as implementation and policy issues; any conclusion about the legal scope or operation of section 70 should be read alongside the full statutory text and any applicable regulations.

Some of the KIs, such as EFCC and NDLEA, however, claim not to have noticed "gaps" in the law and stress that POCA largely reinforces existing practice. However, respondents from CSOs see the emerging reform debate as precisely about ironing out these legal inconsistencies: clarifying the division of labour between multiple asset-recovery laws, resolving conflicts between POCA and special statutes, and strengthening the text of POCA in areas like disposal procedures, central management options, and record-keeping obligations to better reflect Nigeria's complex implementation realities.

Institutional challenges

Institutional fragmentation is the most persistent cross-cutting challenge described in the literature and confirmed by the stakeholders. Most CSOs operating in the field complain about this challenge, which they say could taint the massive success achieved by enacting the POCA. According to one CSO, "The multi-agency structure of Nigeria's asset recovery sector, where many agencies have overlapping mandates, creates a vacuum in the coordination of asset recovery initiatives. This is a setback when compared to the advancement of Nigeria globally and regionally."[57] One of the most significant institutionally related challenges is the absence of an overall supervisory or accountability body to monitor compliance with the POCA by relevant organisations.[58] For example, no institution oversees whether relevant agencies comply with their POCA obligation to pay proceeds of crime into the Confiscated and Forfeited Properties Account, as required by the Act.[59] The cited literature likewise identifies accountability gaps and weak coordination.

A worrisome omission in the Act is the obvious lack of provisions for an accountability process to which the relevant organisations and their Directorates must be subject, as well as the absence of an independent review process for decisions of the relevant organisations in their handling and management of recovered proceeds of crime.[60]

[57] CISLAC *Common African Position on Asset Recovery: Implementation in* Nigeria https://cifar.eu/wp-content/uploads/2024/11/2024-CAPAR-Assessment-Nigeria.pdf (Accessed 20 March 2026) 9
[58] EOC Obidimma 'A critical review of the proceeds of crime (Recovery and Management) Act 2022' (2025) 10 *African Journal of Criminal Law and Jurisprudence* 87.
[59] POCA, Sections 68 and 69
[60] ME Jemialu 'Nigerian Proceeds of Crime Act, 2022: Accountability Deficit on Recovered Proceeds of Crimes' (2022) 8(6) *International Journal of Law* 2

Section 81(1) expressly empowers the Attorney-General of the Federation, in consultation with relevant organisations, to make regulations for a standardised automated asset-forfeiture management system.[61] POCA also provides for the designation of relevant organisations.[62] The interviews and literature reviewed for this study raise the question whether these specific powers, by themselves, amount to a general power to supervise and compel compliance across all relevant organisations. This report does not treat that legal question as settled; it recommends authoritative clarification of the scope of existing oversight powers.

Most of the organisations mandated to establish the Directorate are under the supervision of different ministries. For example, the EFCC and the ICPC are under the supervision of the Ministry of Justice, while the Nigerian [sic] Police Force is under the supervision of the Ministry of Police Affairs. Similarly, the Nigerian Customs Service and the Nigerian Immigration Service are under the supervision of the Ministry of Interior, while the Federal Inland Revenue Service is under the supervision of the Ministry of Finance. Without effective coordination of the activities of these Directorates, there may be no uniformity and synergy in their approach to the management of seized and forfeited assets, and this may undermine transparency and accountability in the management of these assets.[63]

Another institutional challenge, as observed by some of the KIs, is that "relevant organisations" operate under different enabling Acts, some of which do not align neatly with the procedural steps for tracing, freezing, seizure and forfeiture laid down in POCA. This creates overlapping mandates across more than a dozen agencies (EFCC, ICPC, Police, NDLEA, NAPTIP, CCB, FIRS, etc.), with no single central asset-management body and no strong statutory mechanism compelling coordination. As a result, interviews from both agencies and CSOs refer to duplication of investigations, competition for "ownership" of cases and assets, and a tendency for agencies to guard rather than share information.

NAPTIP's interview offers a micro-institutional example. The agency has only an "Asset and Financial Investigation Unit" and a small POCA team (a focal person and three data officers). It is still in the process of securing management approval to upgrade this into a full directorate as POCA requires. Because NAPTIP was historically a purely prosecutorial body, shifting organisational culture and practice towards asset tracing and management demands internal reform, new reporting lines and a redefinition of responsibilities vis-à-vis other departments. CCB faces a similar internal realignment: its new Proceeds of Crime and Recovery Management department must work "in synergy" with the investigation and legal departments, which have traditionally led cases, and sensitise colleagues to allow the new unit to coordinate seizures and management. In contrast, the older departments continue investigations and litigation. That "acceptance is slow", and some staff remain unclear that certain functions have now migrated to the POCA department.

Externally, some Key Informants underscore the lack of robust coordination platforms embedded in POCA itself. While section 6(12) calls on relevant organisations to "co-operate with other relevant entities", the Act does not establish joint taskforces, inter-agency committees, or mandatory MOUs with clear roles, timelines, and accountability for asset recovery. The result, as the note puts it, is that

[61] POCA, Section 81
[62] POCA, Section 82
[63] DJ Ayinde '*An appraisal of the legal and institutional frameworks for the management of seized and forfeited assets in Nigeria'* (2025) 28(7) *Journal of Money Laundering Control* 24

agencies often operate in parallel rather than as a coherent system, missing opportunities to leverage each other's expertise (forensic, investigatory, prosecutorial, diplomatic) and sometimes working at cross-purposes.

Some CSOs point to partial compensation outside POCA: bodies such as TUGAR's Inter-Agency Task Team, NFIU-led intelligence-sharing platforms, and ARMU-convened stakeholder meetings have established some norms of cooperation and produced useful guidance on asset recovery. Yet others stress that ARMU currently focuses more on managing MOUs and external returns than on day-to-day domestic coordination, and that the TUGAR working groups - asset recovery, illicit financial flows, safe reporting - were designed pre-POCA and now need to be more tightly aligned with the Act's institutional architecture. Meanwhile, one CSO underlines that, in the absence of a central asset management agency, each institution understandably resists ceding control of "its" assets to another body, reinforcing siloed working even within the overarching POCA framework. However, it was not in support of creating a new agency for this purpose but rather called for the Federal Ministry of Justice to take on this critical role.

Interviewees and civil-society stakeholders perceive considerable operational discretion across relevant organisations, while the evidence points to gaps in consistent oversight and accountability. Formal directorates and coordination networks exist, but institutional reforms remain incomplete and internal roles are still contested. The practical concern identified by the study is that the decentralised model continues to create coordination gaps; the precise legal scope of existing supervisory powers requires authoritative clarification.[64]

Technical challenges

The Key Informants reveal that technical infrastructure, such as databases, connectivity, standardised templates, and interoperable systems, is a major bottleneck in translating POCA's formal requirements into operational reality. NDLEA's assistant director explains that while the agency has created SOPs and templates for "on-the-spot" reporting, custody and disposal, and has populated the central database with about 934 properties, the process is hampered by both historical and technical problems. Older forfeiture cases often lack easily retrievable certified court orders and complete asset particulars, making it difficult to populate the fields required by the ARMU portal (such as suit number, date of final forfeiture, names, asset description, etc.). On top of this, he points to recurring network failures and portal inaccessibility ("sometimes the site will not open"), as well as a dearth of computers and related equipment, all of which slow down compliance.

NAPTIP's focal person paints a similar 'gloomy' picture from a different starting point. The agency has developed an internal common investigation database with fields for forfeited assets and has recently trained desk officers from 34 commands to use the NFIU's CRIMS platform for financial investigations, but she emphasises that the internal system is "not yet perfected" and does not capture all data on recoveries. Rolling it out nationwide requires sustained investment in hardware, connectivity, and user training, and linking it to the POCA central database remains an ambition rather than a reality.

[64] ME Jemialu 'Nigerian Proceeds of Crime Act, 2022: Accountability Deficit on Recovered Proceeds of Crimes' (2022) 8(6) *International Journal of Law* 2

Because NAPTIP has not yet been granted access to ARMU's portal (despite opening official emails and fulfilling other requirements), officers trained on the central database have not had the opportunity to put that training into practice.

Some Key Informants discussed systemic interoperability issues. They note that relevant organisations use different databases and record-keeping systems that are not accessible to sister agencies, which impedes timely information-sharing, complicates cross-matching of cases, and slows asset tracing. The note also underlines that, although section 81 empowers the Attorney-General to make regulations for "standardised automated asset forfeiture management", this power has mainly been used to drive record-keeping and reporting obligations; it has not yet produced a fully integrated, uniform technical ecosystem across agencies.

Even relatively better-resourced bodies experience technical strain. CCB's POCA department has designed its internal database based on the Attorney General's template and prides itself on updating entries within 24 hours of receiving court orders. However, the acting director acknowledges that consistent operations still depend on adequate laptops, electricity, and connectivity, which are not always guaranteed. The Police POCA unit, meanwhile, remains stuck at the gateway: until it receives official email addresses and access codes from the Ministry of Justice, it cannot begin uploading data to the central database. It must rely on letters to collect returns from zonal commands.

Collectively, these testimonies show that technical challenges are not merely ancillary; they are central determinants of implementation. Without reliable IT infrastructure, interoperable systems, and stable connectivity, even well-designed legal and institutional frameworks struggle to deliver the timely, accurate, system-wide data flows that POCA's model presupposes.

Capacity challenges

Capacity constraints - human, financial and organisational - are pervasive across the interviews and intersect with the legal, institutional and technical issues already described. At the front line, agencies emphasise basic resource shortages. The Police POCA unit lists "funding" as a general challenge and calls for more vehicles, staffing and training to enable effective tracing, seizure and reporting under POCA and its Regulations. NAPTIP's representatives cite office space and internet access constraints, limited budgetary provision, and the need for sustained training and retraining to raise POCA awareness above the current 10 per cent they estimate among staff. NDLEA's assistant director likewise stresses the need for increased budgetary allocations, more computers and logistics, and ongoing capacity-building for both investigators and database officers.

Beyond sheer numbers, the interviews highlight qualitative skill gaps. There appears to be a shortage of expertise in forensic accounting, digital assets, and the use of international legal instruments, all of which are crucial for effective asset tracing and cross-border cooperation. The study also flags weak familiarity with complex financial cases among some prosecutors and judges, leading to frequent appeals and delays in freezing and forfeiture orders, during which assets deteriorated and were dissipated. NDLEA's account of judges expressing human rights concerns about non-conviction-based seizures during a joint training at the EFCC Academy illustrates how doctrinal and capacity concerns can slow the acceptance and application of key POCA tools.

Agencies are trying to close these gaps with the support of development partners. NAPTIP references a “train-the-trainer” programme at the EFCC Academy, supported by ANEEJ through support from FCDO and the African Centre, which targeted law-enforcement officers and a small number of judges. NDLEA notes that the same workshop contributed to building a cadre of officers more comfortable with the technicalities of the central database and non-conviction-based forfeiture, even if the scale of participation (for example, only two judges attending) underscores how much remains to be done. CCB’s acting director acknowledges that donor-funded trainings and possible future equipment support have been instrumental in getting the young department off the ground.

Civil-society interviews echo this capacity theme in a different register. One CSO observes that, while a handful of CSOs now have significant expertise in asset-recovery monitoring and POCA implementation (ANEEJ, CEYWI, CLEEN, BudgIT, CODE, PPDC, African Centre), the vast majority of NGOs still focus on general budget work and lack the technical skills to engage with complex asset-recovery data or legal processes meaningfully. Another CSO similarly stresses that effective social accountability around recovered assets requires sophisticated engineering, financial, and procurement expertise, which only a few organisations have built through practice in cases like Abacha 3.

Taken together, the interviews portray a field in transition: POCA has triggered new training programmes, directorates and specialist units, but the depth and breadth of capacity - within agencies, in the judiciary and within civil society - still lag behind the demands of a sophisticated, decentralised asset recovery regime.

CHAPTER SEVEN

Policy Recommendations

The recommendations below respond to the implementation gaps identified in the interviews and documentary review. They distinguish actions that may be pursued through administrative guidance and coordination from proposals that may require legislative amendment. The proposed lead institutions and milestones are indicative and should be confirmed through consultation with the relevant public institutions.

Legal reforms

- **Amend POCA in a targeted way to:**
  - Clarify the institutional model for supervision and coordination. Options include strengthening the Attorney-General's existing coordinating role through clear mandates, reporting requirements and appropriate compliance mechanisms, or considering a separate supervisory arrangement if a legal and institutional assessment demonstrates that it is necessary. Any proposal should specify the legal basis, accountability safeguards, relationship with existing directorates and resource implications.
  - Review whether key obligations of relevant organisations should be stated more clearly in the Act rather than left primarily to subsidiary legislation. Clarify the relationship between each organisation's internal records and the national central database, including the information required, reporting timelines, verification responsibilities and access controls.
  - Codify minimum, uniform procedures for appointing asset managers, valuers and auctioneers (competitive selection, conflict-of-interest rules, publication of awards and disposal outcomes).
  - Clarify how POCA interacts with sectoral regimes like NAPTIP's Victims of Trafficking Trust Fund, so victims' entitlements are preserved while POCA's supremacy is respected.
  - Streamline victim restitution under section 70(c) with clear administrative procedures and time limits, reducing reliance on slow, highly political Presidential/FEC authorisations.

- **Issue an Attorney-General implementation circular to:**
  - Interpret key grey areas (e.g. where agency-specific Acts converge/diverge with POCA).

- Require each relevant organisation to review and update its internal rules/SOPs to be consistent with POCA and the Regulations within a fixed deadline, and to report compliance.

Institutional reforms

- **Create or formally designate a standing POCA Inter-Agency Coordination Committee, with its mandate, decision-making authority, membership, reporting line and relationship to existing coordination platforms clearly defined:**

  - Chaired by the Attorney-General/ARMU, with heads of Proceeds of Crime directorates in EFCC, ICPC, Police, NDLEA, NAPTIP, CCB, FIRS, NFIU, plus TUGAR and a small CSO representation.
  - Mandated to adopt a standard inter-agency MoU on case referral, joint investigations, information-sharing and asset management, with agreed focal points and timelines.

- **Align and rationalise existing coordination platforms:**
  - Make TUGAR's Asset Recovery Working Group the technical arm of this Committee, explicitly tasked with supporting POCA implementation (not running on a separate track).
  - Convene annual POCA implementation retreats bringing together agencies, ARMU, TUGAR, judiciary and key CSOs to review progress, resolve overlaps and set priorities.

- Require agencies still at the "unit" level to complete the upgrade to "directorates", with clear organograms and mandates, as a condition for future budget increases.
- Strengthen National Assembly oversight of POCA implementation through periodic evidence-based hearings, standard reporting templates and follow-up on agreed actions, while respecting operational confidentiality and judicial independence.

Technical reforms

- **Assess and, if justified, establish a time-bound POCA IT and database support facility:**
  - Provide short-term financing to under-resourced agencies (Police, NDLEA, NAPTIP, CCB, others) for computers, connectivity, and basic infrastructure needed for internal databases and access to the central database.
  - Tie support to concrete obligations: appointment of named database officers, adoption of standard templates, and quarterly upload reports to ARMU.

- **Standardise and integrate data systems:**
  - ARMU to issue a single mandatory metadata template (fields and formats) that all agencies must mirror in their internal systems, ensuring compatibility with the central database.
  - Prioritise technical linking (via APIs or batch uploads) of existing systems, such as EFCC's Eagle database, NDLEA's new templates, CCB's database, and NAPTIP's investigation database, to the central platform.

- **Enhance public-facing transparency tools:**
  - In the short term, publish quarterly bulletins summarising new final forfeitures and disposals by agency (basic case type, values, intended use of proceeds).
  - In the medium term, build a public portal layer on top of the central database that displays summarised data on both external and domestic assets.

Capacity-building reforms

- **Institutionalise a multi-agency POCA training programme, using an existing anti-corruption or law-enforcement training institution as the hub:**
  - Use any existing anti-corruption agency academy as a hub to run regular joint courses on asset management, complex financial investigations, asset tracing, database use and inter-agency coordination.
  - Reserve slots for prosecutors and judges in each cohort to deepen judicial familiarity with POCA tools and financial-crime case management.

- **Require each relevant organisation to adopt a POCA Capacity Plan:**
  - Define minimum staffing profiles for Proceeds of Crime directorates (investigators, forensic accountants, IT/database officers, legal officers).
  - Link incremental budget increases to meeting specific capacity milestones (e.g. directorate creation/upgrade, fully staffed three-officer reporting chains for the central database, nationwide training roll-out).

- **Strengthen CSO and public oversight capacity:**
  - Create a small Civil Society Advisory Panel on POCA, composed of experienced organisations, to engage regularly with ARMU/the Coordination Committee and review public data.

- Support targeted training for CSOs and journalists on reading POCA data, monitoring utilisation of recovered assets, and using FOI and public-engagement tools effectively.

7.1 Implementation sequencing and monitoring matrix

The matrix below summarises suggested sequencing and indicators for follow-up. It is intended to support implementation planning; the proposed leads and milestones should be validated with the institutions concerned and do not imply that any institution has accepted these assignments.

Priority / timing	Recommended action	Indicative lead actors	Suggested indicator of progress
Immediate	Issue implementation guidance on reporting duties, agency SOPs and unresolved legal interfaces.	Federal Ministry of Justice / Attorney-General, in consultation with relevant organisations.	Guidance published; organisations acknowledge receipt and submit implementation plans.
Immediate	Establish a verified baseline of agency structures, database access, reporting status and outstanding records.	ARMU and relevant organisations.	Agency-by-agency baseline completed with dated status and definitions for reported figures.

Priority / timing	Recommended action	Indicative lead actors	Suggested indicator of progress
Short term	Formalise inter-agency coordination, referral protocols and information-sharing arrangements.	Attorney-General / ARMU and participating relevant organisations.	Terms of reference and protocols approved; meetings and action points recorded.
Short to medium term	Address priority hardware, connectivity, data standardisation and system-access gaps.	Relevant organisations and ARMU, subject to budget approval.	Access and reporting status tracked; completeness and timeliness of uploads measured.
Medium term	Strengthen asset-disposal safeguards and public reporting on recoveries, disposals and proceeds.	Relevant organisations, oversight bodies and ARMU within their mandates.	Published periodic summaries, with lawful redactions and clear reconciliation of proceeds.
Ongoing	Institutionalise training and appropriate civil-society and media capacity for independent oversight.	Relevant training institutions, public agencies and qualified CSOs.	Training coverage and documented oversight engagement reviewed periodically.

Source: ANEEJ Research design 2026.

CHAPTER EIGHT

Conclusion

The evidence from this study suggests that POCA has already begun to change the architecture and practice of asset recovery in Nigeria, but its transformative potential remains only partially realised. The Act and the 2024 Regulations have prompted agencies to create or upgrade Proceeds of Crime directorates, develop SOPs and templates where none existed, and build central databases and internal record-keeping systems that would have been difficult to imagine in the pre-POCA era. They have also given civil society and international partners a clear normative benchmark for monitoring Nigeria's asset-recovery performance. Yet, across the interviews, what stands out is a persistent gap between formal compliance and effective, system-wide implementation. Legal ambiguities, institutional fragmentation, technical bottlenecks and capacity shortfalls have combined to slow the emergence of a genuinely coherent, transparent and victim-centred regime.

Looking ahead, closing this implementation gap will require a shift from simply "having" POCA to actively managing it as a living framework that must be continually interpreted, coordinated and resourced. On the legal plane, the interviews point towards a modest but important amendment agenda. Rather than re-opening the entire statute, policy-makers can focus on specific frictions that practitioners have identified: clarifying how POCA interacts with sectoral arrangements such as NAPTIP's Victims of Trafficking Trust Fund; codifying transparent, competitive procedures for appointing asset managers and auctioneers; and simplifying victim restitution procedures to reduce political bottlenecks and delays. Alongside legislative tweaks, a strong interpretive role for the Attorney-General is essential. Clear, public guidance on how POCA interfaces with existing agency Acts, and on the minimum content of internal SOPs, can reduce the uncertainty that currently encourages agencies to default to old habits.

However, the interviews make clear that the more profound challenges are institutional and systemic. A decentralised model built around multiple Proceeds of Crime directorates will always risk duplication and rivalry unless there is a robust coordinating centre. The experience of platforms such as TUGAR's working groups and the ARMU-led central database shows that coordination is possible. However, it is still too dependent on personalities and donor projects. A forward-looking implementation strategy should therefore concentrate on constructing durable coordination mechanisms: a standing inter-agency POCA committee with decision-making authority; standardised MOUs on case referral and information-sharing; and regular joint reviews where agencies, the judiciary and civil society can collectively assess progress and agree adjustments. If Nigeria opts against a single central asset management agency, it must instead build a culture and infrastructure of cooperation that makes decentralisation workable in practice.

Technical and capacity investments are the other decisive frontier. Without interoperable databases, stable connectivity, and a critical mass of trained investigators, data officers, prosecutors, and judges, the central database will remain an underused compliance tool rather than the backbone of a modern asset recovery system. The testimonies from NDLEA, NAPTIP, the Police and CCB highlight how

relatively modest upgrades—computers, bandwidth, standard templates, and the ability to link their internal systems to ARMU's portal—could yield immediate gains in accuracy, timeliness and transparency. Equally, the experience of joint training at the EFCC Academy shows that targeted, multi-agency capacity-building around non-conviction-based forfeiture, complex financial cases, and database use can quickly change practice when institutionalised rather than treated as an occasional event. In this sense, POCA implementation should be understood as a medium-term state-building project in the asset recovery domain, not a one-off compliance exercise.

Finally, the study underscores that transparency and public oversight are not peripheral concerns but central indicators of whether POCA is working as intended. Civil society organisations have already demonstrated, through the monitoring of Abacha-3 and later returns, that independent scrutiny can reduce the risk of re-looting, improve the quality of projects funded from recovered assets, and build public trust. Yet their reach remains limited, and ordinary citizens still have little direct visibility of the universe of recovered assets and their uses. A forward-looking implementation agenda should therefore treat the ARMU central database not only as an internal reporting platform, but as the foundation of a public-facing information system: one that offers regular, comprehensible updates on domestic and external recoveries; that allows legislators, journalists and communities to ask informed questions; and that embeds civil-society participation in disposal and utilisation processes as a matter of routine, not exception.

In sum, POCA has given Nigeria a sophisticated legal framework that is already reshaping institutional behaviour and international perceptions. The next phase is about depth rather than breadth: harmonising laws at the margins, consolidating the new directorates into a coordinated whole, investing deliberately in systems and skills, and hardwiring transparency and oversight into every stage of the asset recovery cycle. If these forward-looking steps are taken seriously, the gap between the promise of POCA and its practice can narrow significantly, and recovered assets can begin to play a more visible and credible role in advancing Nigeria's development and justice objectives.

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