



# Policy, Structural, and Institutional Challenges and Effective Emergency Response in Nigeria: 1999–2025

Emenike Umesi PhD<sup>1\*</sup>, Robert Ekemini<sup>2</sup>

<sup>1</sup>Senior Lecturer, Public Policy and Disaster Governance, African University of Science & Technology, Abuja, Nigeria

<sup>2</sup>Department of Disaster Risk Reduction, NEMA

Corresponding Author

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## ABSTRACT

This paper analyses the policy, structural, and institutional challenges that have persistently undermined effective emergency response and disaster risk management (DRM) in Nigeria from 1999 to 2025. Spanning nearly three decades of democratic governance, the period under review captures the country's construction of a civilian-led emergency management architecture under the National Emergency Management Agency (NEMA), established by Decree No. 12 of 1999, and the subsequent evolution of a complex, multi-layered regulatory and institutional landscape. Yet, despite this institutional development, Nigeria has continued to suffer catastrophic losses of life, property, and productive capacity from both natural and human-induced disasters, including recurrent flooding, armed insurgency, epidemic emergencies, industrial accidents, and protracted displacement crises. Using a structured qualitative document analysis of a purposively assembled corpus—statutory and policy instruments, peer-reviewed studies, UN and humanitarian agency reports, and grey literature—appraised against explicit inclusion criteria and a tiered evidence hierarchy, the paper identifies five interrelated systemic weaknesses: (1) legislative inadequacy and implementation gaps; (2) federal–state coordination deficits; (3) chronic underfunding; (4) corruption, politicisation, and weak accountability; and (5) data fragmentation and interoperability failure. Each weakness is interpreted through institutional theory, intergovernmental relations scholarship, Comfort's crisis-management framework, and the Sendai Framework, and together they sustain a reactive rather than preventive posture in emergency governance. A cross-case synthesis of the 2012, 2022, and 2024 flood disasters, the Boko Haram/ISWAP humanitarian emergency, and the COVID-19 response shows how these weaknesses recur, and a traceability matrix links each reform recommendation to the evidence on which it rests. The author's earlier work on coordination, communication, and cooperation in humanitarian action (Umesi, 2021) and on human resource capacity in the emergency management sector (Umesi, 2021b), together with his practitioner experience, informs the framing of the analysis but is treated as corroborative rather than sole evidence, and the limitations of a documentary, single-coder design are stated explicitly. The paper evaluates Nigeria's alignment with the Sendai Framework for Disaster Risk Reduction 2015–2030 and concludes with evidence-linked reform recommendations.

**Keywords:** Nigeria, emergency management, NEMA, disaster risk reduction, data inoperability, Sendai Framework, humanitarian response, institutional capacity, flood governance, federal coordination

## 1. INTRODUCTION

Nigeria, Africa's most populous nation with an estimated 230 million inhabitants and the continent's largest economy by nominal GDP, occupies a paradoxical position in global disaster risk management discourse. On the one hand, the country possesses vast human capital, extensive natural resources, and a formal emergency management architecture developed over more than two decades of democratic governance. On the other hand,



it remains among the most disaster-vulnerable states in sub-Saharan Africa, characterized by chronic institutional underperformance, structural inequities, persistent corruption, and fragmented intergovernmental coordination—factors that collectively erode the state's capacity to prevent, prepare for, respond to, and recover from disasters (Mashi et al., 2019; Onwurah & Agbaeze, 2022).

The return to civilian democratic rule in 1999 marked a critical juncture in Nigeria's DRM trajectory. That year, NEMA was formally established, replacing the National Emergency Relief Agency (NERA), which had operated primarily as a reactive relief organization since 1976. Subsequent instruments—the National Disaster Risk Management Policy (2018), the Climate Change Act (2021), the National Policy on Internally Displaced Persons (2021), and the National Contingency Plan 2023–2030—progressively expanded the regulatory architecture (NEMA, 2018; NEMA, 2024). Yet, institutional formalization has not translated proportionately into operational effectiveness.

As the author has argued elsewhere, effective humanitarian action requires an interlocking tripod of cooperation, communication, and coordination that must be "constantly oiled for a seamless flow of activities" (Umesi, 2021, p. 3). This paper examines whether, across the 1999–2025 period, this tripod has been weakened by policy failures, structural deficits, and institutional pathologies that no single reform has yet been sufficient to overcome. The analysis draws on the author's practitioner experience within NEMA and his academic scholarship to offer a perspective that is simultaneously inside and analytical—attentive to the operational realities that purely external scholarship may underestimate. Because an insider perspective carries risks as well as advantages, the author's own work and observations are used only as framing and corroboration, never as the sole support for a factual claim about system performance (Section 2.5).

The catastrophic floods of 2012 displaced over 2.1 million Nigerians; the 2022 floods displaced up to 1.4 million (estimates in the sources reviewed range from about 600,000; see Section 2.7) and damaged 440,000 hectares of farmland; and the 2024 flood season displaced about one million more people and destroyed 1.3 million hectares of crops, while coinciding with cholera outbreaks reported across all 36 states (OCHA, 2024; New Security Beat, 2026). The northeastern humanitarian emergency has sustained over 2.3 million internally displaced persons (IOM, 2024; ACAPS, 2025). These recurring crises suggest that the gap between policy intent and field-level emergency response remains wide and demands systematic scholarly interrogation.

The paper addresses three research questions. RQ1: Which policy, structural, and institutional weaknesses recur in Nigeria's emergency management system across the 1999–2025 period and across major disaster events? RQ2: How far are these weaknesses explained by the institutional, intergovernmental, and international-normative frameworks introduced in Section 3? RQ3: Which reforms follow most directly from the evidence, and how strong is the evidence for each?

## **2. METHODOLOGY**

### **2.1 Research Design**

This study employs a qualitative, interpretive research design organized around structured document analysis, narrative case study construction, and critical policy analysis. The qualitative approach is appropriate for this inquiry because the object of study—governance performance in emergency management—involves complex, context-embedded institutional processes that cannot be adequately captured through quantitative measurement alone (Creswell & Creswell, 2018). The research does not seek to generate statistically generalizable findings but rather to produce theoretically grounded, empirically substantiated analytical insights relevant to policy reform in Nigeria's specific governance context.

The study spans the period 1999 to 2025, selected to align with the commencement of civilian democratic governance and the formal establishment of NEMA as the primary DRM coordinating authority. This temporal scope encompasses five presidential administrations (Obasanjo, Yar'Adua, Jonathan, Buhari, Tinubu), enabling a longitudinal assessment of institutional continuity and change across successive governance regimes. The extended temporal range also allows evaluation of Nigeria's alignment with evolving international DRM



normative frameworks, from the Hyogo Framework for Action (2005–2015) through the current Sendai Framework (2015–2030).

## 2.2 Data Sources and Collection

Data were gathered purposively from four categories of primary and secondary sources, which are summarised, together with the appraisal rules applied to each, in Table 1 (Categories A–D; Categories E and F cover the author's own studies and methodological and theoretical works). First, primary legislative and policy documents were reviewed in full, including the NEMA Establishment Act (1999), the National Disaster Risk Management Policy (2018), the Climate Change Act (2021), the National Policy on Internally Displaced Persons (2021), and the National Contingency Plan 2023–2030. These documents constitute the formal normative architecture of Nigeria's DRM system and are reference points for evaluating implementation performance; they are used to establish what policy states, not what is implemented.

Second, scholarly literature was identified through structured searches of Scopus, Web of Science, Google Scholar, and ResearchGate, using search terms including "Nigeria emergency management," "NEMA disaster governance," "Nigerian flood response," "Sendai Framework Africa," and "intergovernmental coordination DRM Nigeria." Priority was given to articles published between 2015 and 2025, with seminal earlier works included where foundational for theoretical or methodological framing. The author's own earlier studies are treated as a separate evidence category with a restricted evidentiary role (Section 2.5).

Third, UN agency situation reports, OCHA humanitarian overviews, IOM Displacement Tracking Matrix data, UNHCR protection reports, IFRC emergency appeals, and ACAPS conflict analysis documents were consulted as contemporaneous empirical records of disaster events and humanitarian response quality. Fourth, grey literature—including NEMA official communications, Nigeria's official statements at international DRR platforms, and reputable media reporting on specific disaster events—supplemented formal academic and institutional sources.

## 2.3 Document Selection, Inclusion Criteria, and Source Appraisal

The search was purposive and iterative rather than exhaustive, and the study is not a PRISMA-style systematic review; screening counts are therefore not reported. Candidate documents were identified through the database searches described above and through direct retrieval of official and agency reports (for example, from NEMA, OCHA/ReliefWeb, IOM, IFRC, ACAPS, and UNDRR platforms). A document was included if it (i) addressed emergency management, disaster risk management, or humanitarian response in Nigeria, or one of the five governance dimensions analysed in this paper; (ii) was issued between 1999 and early 2026, so as to capture retrospective assessments of events up to 2025, or was a foundational theoretical or methodological work; (iii) had identifiable provenance—a named author or issuing institution, a date, and a retrievable location such as a DOI or stable URL; and (iv) was available in English. Documents were excluded if they were unattributed web content, opinion without supporting evidence, duplicates of an included source, or reported impact figures that could not be traced to a stated methodology or issuing agency.

Included sources were then classified into six categories and appraised against explicit rules (Table 1). Five rules governed how evidence was used. R1 (impact figures): figures on deaths, displacement, and damage are taken from UN and humanitarian agencies or official records; where sources conflict, the range is reported and any single figure is attributed to its source. R2 (corroboration): a claim about an institutional weakness is stated as a finding only if supported by at least two independent source categories (for example, a legal instrument and a peer-reviewed study, or a peer-reviewed study and an agency assessment); otherwise it is labelled as practitioner observation or as an evidence gap. R3 (scope fidelity): a study's findings are cited at the scope studied and are not generalised beyond its setting. R4 (grey literature and media): used to locate primary sources and to illustrate, but never as the sole support for an evaluative or causal claim. R5 (author's own work): never the sole support for a factual claim about system performance (Section 2.5).

**Table 1. Source categories, number of items cited, analytical role, and appraisal rule**

| Category                                        | Examples                                                                                                                                                              | n  | Role in the analysis                                                                                      | Appraisal rule                                                                                                        |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| A. Statutory, policy, and official instruments  | NEMA Act (1999); National DRM Policy (NEMA, 2018); Nigeria's statement to the 9th Africa Regional Platform (NEMA, 2024); National DRR Strategy 2023–2030 (UNDP, 2024) | 3* | Define the formal normative architecture and the benchmark for implementation gaps                        | Evidence of what policy states, not of what is implemented; implementation claims need independent corroboration (R2) |
| B. Peer-reviewed and scholarly studies          | Mashi et al. (2019); Raji et al. (2021); Okunola (2025); van Duyne & Harvey (2025); Lawanson et al. (2022)                                                            | 11 | Evidence on institutional performance and causal explanation                                              | Preference for studies with stated methods; cited at the scope studied (R3)                                           |
| C. UN, humanitarian, and international agencies | OCHA (2024); IOM (2023, 2024); IFRC (2024); ACAPS (2025); UNDRR (2025); UNODC (2019); World Bank (2023); IRC (2025)                                                   | 9  | Event-level impact and response records                                                                   | Primary source for impact figures; conflicts reported as ranges (R1)                                                  |
| D. Grey literature and media                    | New Security Beat (2026); International Fire and Safety Journal (2025); PreventionWeb (2007); SDI Nigeria (2016); Ufuoma (2020); Muntaka & Osakwe (n.d.)              | 6  | Context, illustration, and locating primary sources                                                       | Never sole support for an evaluative or causal claim (R4)                                                             |
| E. Author's own prior studies                   | Umesi (2020, 2021, 2021b)                                                                                                                                             | 3  | Conceptual framing (cooperation–communication–coordination tripod) and illustrative practitioner evidence | Never sole support for a claim about system performance (R5)                                                          |
| F. Methodological and theoretical works         | Bowen (2009); Creswell & Creswell (2018); North (1990); Comfort (2007)                                                                                                | 4  | Frame the research design and analytical lenses                                                           | Not used as empirical evidence                                                                                        |

\* In addition, the statutory and policy instruments named in Section 2.2 (NEMA Act 1999; Climate Change Act 2021; National Policy on IDPs 2021; National Contingency Plan 2023–2030) were reviewed in full and are cited by title. *n* = number of items in the reference list (total 36).

## 2.4 Analytical Approach and Theme Development

Document analysis followed the framework proposed by Bowen (2009), involving skimming for relevance, reading for comprehension, and interpretation in light of the study's analytical framework. Case studies were constructed using a structured narrative approach, drawing on multiple corroborating sources for each event to mitigate single-source bias. Critical policy analysis employed a governance lens—specifically North's (1990) distinction between formal and informal institutions, Comfort's (2007) crisis management framework, intergovernmental relations scholarship on Nigerian federalism, and Sendai Framework Priority 2 criteria on governance—to evaluate the alignment between stated policy intent and documented operational outcomes.

Theme development proceeded in five steps. (1) Familiarisation: documents in Categories A–D were read in full and annotated for statements describing a weakness, constraint, or enabling condition in emergency



preparedness, response, or recovery. (2) Open coding: annotated extracts were coded inductively in a matrix recording the source, its category (Table 1), the period, the event (where applicable), and the level of government concerned. (3) Clustering: codes describing the same underlying problem were grouped into candidate themes. (4) Validation: a candidate theme was retained only if it (a) appeared in at least two source categories, (b) was evidenced across more than one administration or in at least two of the case events, and (c) was analytically distinct from the other themes; candidates failing (a) or (b) were merged or dropped. Retained themes were then checked against the deductive predictions in Table 2, and disconfirming evidence was actively sought—for example, the accuracy of NIHSA and NIMET flood forecasts and the community-led anticipatory action evaluated in Yola (IRC, 2025), which indicate that technical capacity and local innovation exist even where governance fails. (5) Mapping: each retained theme was paired with the theoretical mechanism expected to explain it and with observable indicators (Table 2). Five themes met these criteria: T1, legislative inadequacy and implementation gaps (analysed in Section 5.1); T2, federal–state coordination deficits (Sections 4.2 and 5.2); T3, chronic underfunding (Section 5.3); T4, corruption, politicisation, and weak accountability (Sections 7.1 and 7.3); and T5, data fragmentation and interoperability failure (Section 2.7 and the cases in Section 8). The persistence of a reactive rather than preventive posture appeared across all five and is treated as an overarching outcome rather than a sixth theme. Logistical, conflict-related, demographic, and human-resource conditions (Sections 6 and 7.2) are treated as structural conditions that cut across the themes.

## 2.5 Positionality and the Status of the Author's Own Work

The author served within the NEMA system. Insider experience improves the interpretation of operational documents, but it also creates risks of institutional loyalty, confirmation bias, and over-reliance on personal recall. Four safeguards were applied: the corroboration rule (R2); a deliberate evidence hierarchy that gives the author's own work the lowest evidentiary weight for claims about system performance (R5); explicit labelling of practitioner observation wherever independent documentation is thin; and a systematic search for disconfirming evidence.

Three earlier studies by the author are used. Umesi (2021) is a practitioner analysis of coordination, communication, and cooperation in humanitarian action in Nigeria. Umesi (2020) is an unpublished assessment of basic education services for IDPs in Maiduguri. Umesi (2021b) is a research paper on human resources training dimensions and job performance among social workers in the emergency management sector in Abuja. They serve two purposes only: conceptual (the cooperation–communication–coordination tripod) and illustrative (examples of capacity and service-delivery constraints). They are not treated as independent verification of system-wide performance because each is single-authored, two are not journal-published, and their empirical scope is limited to specific settings (Maiduguri; Abuja). Wherever they are cited in support of a factual claim, an independent source of a different category is cited alongside them; where none exists, the claim is presented as practitioner observation.

## 2.6 Limitations

Five limitations qualify the findings. First, the design is documentary: no interviews, field observation, or administrative microdata were collected, so claims about internal organisational behaviour rest on what documents report. Second, coding was carried out by a single researcher, so inter-coder reliability could not be assessed; the corroboration rules and the explicit audit trail in Table 1 and Table 2 are the principal mitigations. Third, coverage is uneven: large, well-reported events (floods, the Northeast crisis) are better documented than slow-onset, local, or sub-national phenomena such as LGA-level emergency structures, for which the corpus offers little independent evidence. Fourth, impact figures differ across agencies (Section 2.7), and the study did not reconstruct NEMA appropriation and release series, so the underfunding theme rests on agency and scholarly assessments rather than budget data. Fifth, the COVID-19 case relies on a small number of sources, including one media-reported survey. The findings are therefore offered as analytically transferable to comparable federal systems, not as statistically generalisable.

## 2.7 Data Inoperability: A Critical Methodological and Governance Challenge

A significant and undertheorized challenge that shaped both the conduct of this research and, more profoundly,



the operational effectiveness of Nigeria's emergency management system itself, is the problem of data inoperability. Data inoperability—or, more precisely, data interoperability failure—refers to the inability of different information systems, platforms, databases, and agencies to exchange, integrate, and make mutual use of data in a timely, accurate, and standardized manner. In the disaster management context, interoperability failure means that critical information about hazard exposure, population vulnerability, infrastructure status, resource availability, and beneficiary identity cannot flow seamlessly across the agencies and levels of government that need it to coordinate an effective response (Bharosa et al., 2010; Information Systems Frontiers, 2018).

In Nigeria, data inoperability manifests across multiple dimensions and scales. At the inter-agency level, NEMA, the Nigerian Hydrological Services Agency, NIMET, NASRDA, the National Population Commission, the National Identity Management Commission, and sector ministries each maintain independent data systems built on different software platforms, data standards, and ontologies. These systems were not designed for interoperability and do not communicate automatically. The consequence is that during a rapidly evolving flood event, for example, real-time river gauge data held by NIHSA, satellite imagery processed by NASRDA, weather forecast data held by NIMET, and population exposure data held by NPC cannot be automatically integrated into a unified situational awareness picture. Emergency coordinators must manually reconcile data from these disparate sources—a time-consuming and error-prone process that introduces critical delays precisely when speed is essential (Umesi, 2021; SDI Nigeria, 2016). The inventory of agency systems in this paragraph relies on SDI Nigeria (2016), Eneh et al. (2024), and the author's professional observation; in the absence of a published systems audit it should be read as an informed characterisation rather than a documented finding.

At the inter-governmental level, data inoperability is compounded by the absence of standardized reporting formats between federal and state emergency agencies. SEMAs collect damage and needs assessment data using locally developed formats that are not aligned with NEMA's national templates or with international humanitarian data standards such as the Humanitarian Data Exchange (HDX) framework. This means that aggregating a national picture of disaster impact requires extensive manual data cleaning and harmonization, introducing both delays and inaccuracies into official situation reports (OCHA, 2024; Eneh et al., 2024).

Spatial data presents a particularly acute interoperability challenge. Nigeria's National Geospatial Data Infrastructure (NGDI) initiative, while conceptually sound, has been only partially implemented, leaving significant gaps in the standardization of geospatial data across agencies. Geographic Information Systems within NEMA operate on data layers that may not align with those used by state governments, infrastructure agencies, or humanitarian partners, creating spatial data fragmentation that undermines effective disaster mapping, evacuation planning, and resource pre-positioning (SDI Nigeria, 2016; Bharosa et al., 2010).

The implications of data inoperability extend beyond operational coordination into the domain of disaster loss accounting and evidence-based policy. Nigeria currently lacks a comprehensive, standardized national disaster loss database that meets the monitoring requirements of the Sendai Framework's seven global targets. Different agencies record disaster impacts using different methodologies, definitions, and temporal boundaries, making it impossible to accurately assess trends in disaster mortality, economic losses, or infrastructure damage over time. This data gap directly undermines Nigeria's ability to report credibly on Sendai Framework implementation progress and to make evidence-based arguments for DRM investment at federal budget negotiations (UNDRR, 2025; Mashi et al., 2019).

The challenge of data inoperability also intersected directly with this study's methodology. Efforts to triangulate quantitative disaster impact figures across official Nigerian government sources, UN agency reports, and academic literature frequently revealed significant discrepancies. For example, reported figures for the number of persons displaced by the 2022 floods ranged from about 600,000 to over 1.4 million across different sources, reflecting different methodologies, different assessment time points, and different definitions of displacement. Discrepancies were handled through source-hierarchy triangulation (rule R1): preference was given to figures from the most methodologically transparent agency sources, ranges are reported where figures could not be reconciled, and any single figure used for comparison is attributed to its source and identified as



such (for example, the 1.4 million figure for 2022 is the upper estimate reported by IOM, 2023). Even these figures carry uncertainty. This experience of navigating data inoperability as a researcher mirrors the experience of emergency managers attempting to coordinate response on the basis of fragmented, inconsistent, and delayed information.

Addressing data inoperability therefore constitutes a reform priority that is simultaneously technical, institutional, and political. Technically, it requires investment in interoperable data standards, shared platforms, and application programming interfaces (APIs) that allow real-time data exchange between agencies. Institutionally, it requires clear mandates, organizational incentives, and leadership commitment to data-sharing cultures that override the territorial instincts that currently cause agencies to hoard information as a resource of bureaucratic power. Politically, it requires sustained executive commitment to the digital transformation of disaster risk governance—an agenda that must compete with more immediately visible public expenditure priorities in a resource-constrained fiscal environment.

### 3. CONCEPTUAL AND THEORETICAL FRAMEWORK

#### 3.1 Theoretical Lenses

The analytical scaffolding of this study draws on three intersecting theoretical traditions: institutional theory, intergovernmental relations theory, and disaster governance scholarship. North's (1990) seminal distinction between formal institutions (laws, regulations, organizations) and informal institutions (norms, conventions, behavioral codes) is foundational. NEMA and the broader DRM legal framework constitute the formal institutional layer. However, their effectiveness is systematically undermined by informal institutions—patronage networks, ethnic solidarity norms, intra-agency rivalries, and corruption cultures—that shape actual organizational behavior (Onwurah & Agbaeze, 2022). As Mashi et al. (2019) observed, there is a persistent implementation gap between legal mandates and on-the-ground performance, driven by inadequate sanctions for non-compliance, politicized appointments, and insufficient capacity.

Nigeria's 1999 constitution establishes a three-tier federal system. In principle, emergency management operates as a concurrent responsibility. In practice, the system suffers from what Lawanson et al. (2022) characterize as "poorly operationalized federalism"—a condition in which constitutional assignments are ambiguous, fiscal transfers are inadequate, and coordination mechanisms are weak. Okunola's (2025) comparative study of multilevel DRR governance in five African countries, including Nigeria, calls for moving beyond institutional silos, and Nigeria-specific assessments report that SEMAs and LGA-level structures remain underfunded and institutionally marginal (Raji et al., 2021; OCHA, 2024). Comfort's (2007) crisis management framework—emphasizing cognition, communication, coordination, and control—provides further analytical purchase. Nigerian emergency responses repeatedly fail along the coordination and communication axes: inter-agency information sharing is limited, command structures are ambiguous, and the lead agency model is inconsistently applied (Umesi, 2021; Raji et al., 2021).

The Sendai Framework for Disaster Risk Reduction 2015–2030 provides the primary international normative framework against which Nigerian DRM performance is evaluated. Its four priorities—understanding disaster risk, strengthening disaster risk governance, investing in DRR for resilience, and enhancing disaster preparedness—establish benchmarks that Nigeria has formally committed to but only partially implemented (UNDRR, 2025). These three theoretical lenses—institutional, intergovernmental, and international normative—are applied in concert throughout the analysis that follows.

#### 3.2 Linking the Five Themes to the Theoretical Lenses

To make the connection between findings and theory explicit, each of the five themes identified in Section 2.4 was paired in advance with the theoretical mechanism expected to explain it, the Sendai Framework priority against which it is judged, and the observable indicators used to test it (Table 2). Section 10 returns to this mapping and assesses how well the evidence supports each pairing.

**Table 2. Analytical framework: themes, theoretical mechanisms, Sendai priorities, and indicators**

| Theme                                                   | Theoretical lens and expected mechanism                                                                                                                                             | Sendai priority                        | Observable indicators                                                                                                                        | Analysed in         |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| T1. Legislative inadequacy and implementation gaps      | Institutional theory (North, 1990): formal rules without enforcement or sanctions are displaced by informal practice, producing a policy–practice gap                               | P2: governance and legal frameworks    | Scope of statutory mandate; compulsion and sanction powers; statutory versus policy status of instruments; continuity across administrations | §4.1–4.2, 5.1       |
| T2. Federal–state coordination deficits                 | Intergovernmental relations and federalism (Lawanson et al., 2022); Comfort (2007) on coordination and control: ambiguous concurrent responsibilities invite coordination avoidance | P2; P4: preparedness and response      | Command authority; lead-agency protocols; translation of forecasts into early action; FMHDS–NEMA role clarity                                | §4.2–4.3, 5.2, 8.1  |
| T3. Chronic underfunding                                | Intergovernmental fiscal relations: mandates without matching resources, and dependence on external funding                                                                         | P3: investing in DRR                   | Dedicated budget lines; regularity of releases; reliance on external humanitarian funding                                                    | §5.3, 8.2           |
| T4. Corruption, politicisation, and weak accountability | Institutional theory: informal institutions (patronage, personal loyalty) shape the behaviour of formal organisations (North, 1990; Onwurah & Agbaeze, 2022)                        | P2: accountability                     | Reported diversion and ghost beneficiaries; appointment criteria; leadership turnover; audit and sanction                                    | §7.1, 7.3, 8.3      |
| T5. Data fragmentation and interoperability failure     | Comfort (2007) on cognition and communication; Bharosa et al. (2010) on information sharing in multi-agency response                                                                | P1: understanding risk; Sendai Monitor | Common formats and platforms; national disaster loss database; discrepancy ranges in impact figures                                          | §2.7, 5.2, 8.1, 8.3 |
| Overarching outcome: reactive posture                   | Sendai's shift from managing disasters to managing risk; Comfort (2007) on control                                                                                                  | P1–P4                                  | Forecast accuracy versus pre-emptive action; pre-positioned resources                                                                        | §8, 10              |

## 4. THE EVOLUTION OF EMERGENCY MANAGEMENT INSTITUTIONS IN NIGERIA: 1999–2025

### 4.1 From NERA to NEMA: A New Institutional Architecture

The transition from NERA to NEMA in 1999 represented a conceptual shift from purely reactive relief provision toward an integrated disaster management cycle encompassing prevention, preparedness, response, and recovery. The NEMA Act empowered the agency to coordinate federal emergency preparedness and disaster assistance functions, develop the National Disaster Response Plan, and collaborate with state governments and international partners (Mashi et al., 2019). NEMA's coordination architecture relies on inter-agency sector groups and a lead-agency model (NEMA, 2018; PreventionWeb, 2007), a design that Umesi's (2021) practitioner analysis describes as enabling multi-stakeholder response when functional. The National Disaster Management Framework, National Contingency Plan, National Influenza Pandemic Preparedness and



Response Plan, National Nuclear and Radiological Emergency Plan, and the Joint Humanitarian Action Plan collectively constitute NEMA's suite of operational tools for disaster management in Nigeria (PreventionWeb, 2007; NEMA, 2018; Umesi, 2021).

## **4.2 The Ministry of Humanitarian Affairs: Institutional Innovation or Complication?**

The creation of the Federal Ministry of Humanitarian Affairs, Disaster Management, and Social Development (FMHDSD) in 2019 added a new tier above NEMA. While the rationale—better political visibility for humanitarian concerns—was defensible, the practical effect was further complication of already-fragmented institutional responsibilities. Coordination between FMHDSD and NEMA, and between both bodies and sectoral ministries, has been reported to involve jurisdictional ambiguity (IOM, 2023), a pattern consistent with the author's professional observation of bureaucratic rivalry. NEMA's strategic plan, developed under Director-General Zubaida Umar from 2024 onwards as a "consultative, evidence-informed" process (International Fire and Safety Journal, 2025), signals a positive intent toward strategic coherence, but implementation remains nascent.

## **4.3 Sub-National Emergency Architecture: SEMAs and LGA Structures**

SEMAs operate in all 36 states with varying degrees of capacity. The 2018 National DRM Policy envisages SEMAs as critical first-response nodes, but empirical assessments indicate that most are chronically underfunded and serve primarily as post-disaster relief distribution channels (Raji et al., 2021; OCHA, 2024). Umesi's (2021b) study of human resources training dimensions and job performance of social workers in the emergency management sector in Abuja found that training needs analysis, program design, and evaluation capacity are inadequate across the sector, with direct consequences for service quality and productivity. Because the study is confined to Abuja, its findings are indicative rather than representative of SEMA personnel nationwide, although they are consistent with Raji et al.'s (2021) finding of capacity gaps in the response to IDPs in the Northeast. At the LGA level, emergency management structures are, in the author's professional observation, largely absent or ad hoc, which constrains community-level preparedness and response. This is one of the points on which the corpus offers little independent documentation (Section 2.6) and it is offered as practitioner observation rather than as a documented finding.

# **5. POLICY CHALLENGES IN NIGERIAN EMERGENCY MANAGEMENT**

## **5.1 Legislative Inadequacy and Implementation Gaps**

The NEMA Act of 1999 has been critiqued extensively for conceptual and operational limitations. Mashi et al. (2019) found that the Act focuses more on establishing NEMA than on developing action plans for mitigating or preventing disaster risks. Critically, the Act does not confer on NEMA the power to compel other government agencies to integrate DRR into their operations, lacks clear-cut resource mobilization directives, and predates the globally accepted governance principles of the Hyogo and Sendai frameworks. The 2018 National DRM Policy addresses some of these gaps conceptually but is a policy instrument rather than legislation (NEMA, 2018); its provisions therefore depend on administrative discretion rather than legal obligation, a condition that the author's practitioner observation links to inconsistent application across agencies and administrations.

Policy discontinuity across administrations is a related challenge. Each transition of federal government has brought shifts in DRM priorities, reorganization of coordinating structures, and disruption of institutional learning. The FMHDSD itself—created under Buhari—represents one such administratively driven structural shift whose long-term embedding in the governance architecture remains uncertain. The absence of a politically insulated, legislatively grounded DRM institution analogous to independent regulatory commissions compounds this vulnerability to executive politics.

## **5.2 Coordination and the Federal Complexity**

NEMA's mandate to "coordinate" federal resources does not confer command authority over state actors. State



governors retain significant discretion over SEMA engagement, and the political dimension of emergency response often means that federal-state coordination is contingent on political alignment rather than humanitarian need (Lawanson et al., 2022; Onwurah & Agbaeze, 2022). Umesi (2021) argues, consistent with

Comfort's (2007) framework, that effective humanitarian coordination requires deliberate architecture—agreed sector working groups, clear lead agency roles, information-sharing protocols—none of which are currently mandated by law (Section 5.1) or, on the evidence reviewed, consistently operationalized in practice.

The consequences are visible in major disaster responses. During the 2022 floods, early warning data from NIHA that accurately anticipated flood risk months in advance was not translated into pre-emptive protective action by state governments or federal agencies. Up to 1.4 million people were displaced (estimates vary; Section 2.7) and 440,000 hectares of farmland were damaged, contributing to severe food insecurity and subsequent cholera outbreaks (IOM, 2023). The 2024 floods showed a similar pattern: 34 states were affected, 285 people died, and the Alau Dam collapse in Maiduguri worsened displacement that had reached 641,598 persons by mid-September (OCHA, 2024).

### **5.3 Chronic Underfunding of DRM**

NEMA and the broader emergency management system are widely assessed as under-resourced relative to Nigeria's disaster risk profile, and SEMAs are reported to be chronically underfunded (Raji et al., 2021; OCHA, 2024); in the author's professional observation, many SEMAs lack dedicated budget lines, and approved appropriations are subject to late disbursement and irregular releases. This study did not reconstruct appropriation and release series, so these budget-level claims rest on the documentary assessments reviewed and on practitioner observation (Section 2.6). Nigeria's dependence on international humanitarian funding for major responses—reported to exceed USD 1 billion annually for the northeastern crisis alone (IOM, 2024)—points to the limits of domestic public financing and raises questions about long-term sustainability and national ownership of DRM. At the workforce level, Umesi (2021b) found inadequate training investment among emergency management social workers in Abuja, an indicator consistent with, but not independent proof of, wider resource constraints.

## **6. STRUCTURAL CHALLENGES IN EMERGENCY RESPONSE**

### **6.1 Logistical Deficits and Infrastructure Vulnerabilities**

NEMA's operational effectiveness is severely constrained by pre-existing infrastructure deficits. During the 2024 floods, collapsed culverts along major highways in Yobe State made it "difficult to deliver humanitarian aid to isolated communities," while damaged access roads in Damaturu and Fune LGAs prolonged the suffering of displaced populations in urgent need of food, shelter, and healthcare (OCHA, 2024). NEMA lacks a full complement of specialized response personnel and equipment for rapid deployment across a geographically vast nation. Umesi's (2021) analysis of NEMA's coordination structure argues that the agency's lead-agency coordination model functions effectively only when member agencies bring adequate operational capacity to the table—a condition rarely met simultaneously across all participating agencies in major multi-state disasters.

### **6.2 Conflict-Disaster Nexus: Compounding Vulnerabilities**

In northeastern Nigeria, the Boko Haram/ISWAP insurgency has generated a protracted humanitarian emergency that NEMA and its partners must address concurrently with natural disasters. As of mid-2024, over 2.3 million IDPs and 2 million returnees were documented in the Northeast, with displacement levels stable between 2.17 and 2.3 million from 2022 to early 2025 (IOM, 2024; ACAPS, 2025). Boko Haram and ISWAP attacks accounted for 66% of all violent deaths in Nigeria in 2024 (Madueke, 2026). Umesi's (2020) assessment of basic education services for IDPs in Maiduguri documents how the compounding of insecurity and displacement creates multi-dimensional vulnerability that overwhelms sector-specific programming and requires integrated, whole-of-government response capacities that Nigeria has yet to institutionalize.



### **6.3 Demographic and Urbanization Pressures**

Nigeria's rapidly expanding urban population is expanding into flood plains and unstable terrain without adequate infrastructure, dramatically increasing disaster exposure. With annual population growth estimated at approximately 2.4%, informal settlements expand faster than regulatory capacity, and building regulations are inadequately enforced. Floodplain mapping and zoning are inconsistently applied; environmental impact assessment processes are routinely compromised by corruption (World Bank, 2023). The consequence is that new urban developments systematically create future disaster exposure at a scale that effective emergency response—however well-organized—cannot adequately address retroactively.

## **7. INSTITUTIONAL CHALLENGES: CORRUPTION, CAPACITY, AND POLITICIZATION**

### **7.1 Corruption and Diversion of Emergency Resources**

Corruption is widely identified as a critical institutional challenge. Van Duyne and Harvey (2025) document how negligent management, payroll fraud such as "ghost workers," and normalised petty bribery weaken Nigerian public services, and the UNODC (2019) survey identifies nepotism in staff recruitment as a pervasive practice that undermines meritocratic staffing. The structural conditions they describe apply with particular force to emergency operations: the emergency context creates large, rapid resource flows through inadequately supervised channels; beneficiary populations are too vulnerable to hold officials accountable; and humanitarian urgency creates pressure for speed that conflicts with diligent audit processes. Allegations of diversion of IDP camp resources, ghost beneficiary registration, and kickbacks in emergency procurement are frequently reported in the Nigerian humanitarian sector, but the corpus reviewed contains little systematic, independent evidence specific to emergency agencies. This is therefore treated as a theme supported by strong general evidence and thinner emergency-specific evidence, and it is one reason the accountability recommendation in Section 11.7 begins with a baseline audit.

### **7.2 Capacity Deficits: Human Resources and Technical Knowledge**

In a study confined to emergency management social workers in Abuja, Umesi (2021b) found that training needs analysis, training program design, training duration, and training evaluation capacity are all inadequate, with negative consequences for productivity, service quality, and job satisfaction. These findings are indicative rather than representative and should be read alongside Raji et al.'s (2021) assessment of NEMA's response capacity, with which they are consistent. They suggest that capacity deficits are not merely aspirational but empirically observable and operationally consequential. Technical capacity in GIS, early warning systems, and disaster risk modeling remains underdeveloped despite partnerships with NASRDA and NIMET, principally because the mechanisms for translating technical data into actionable early warning communications remain weak (Badiru et al., 2023).

### **7.3 Politicization of Emergency Management**

Appointments to NEMA and SEMA leadership are widely perceived to be influenced by party affiliation and personal loyalty rather than professional competence (Onwurah & Agbaeze, 2022), a perception consistent with the author's professional observation of frequent leadership turnover, disruption of institutional learning, and compromise of the agency's credibility with professional partners. The "disaster politics" dynamic—wherein federal response resources are calibrated to political considerations rather than purely humanitarian need—would contradict the humanitarian principles of neutrality and impartiality (Onwurah & Agbaeze, 2022). Institutional theory predicts that such informal practices will persist where accountability is weak or selectively applied (North, 1990); whether and how far this applies to emergency agencies specifically is an empirical question on which the corpus is thin.



## 8. COMPARATIVE CASE STUDIES IN EMERGENCY RESPONSE

### 8.1 Recurrent Flood Crisis: 2012, 2022, and 2024

Flooding is Nigeria's most frequent and economically costly natural hazard, and the recurrence of major flood events across this period provides a longitudinal lens on governance performance. Seasonal outlooks by NIMET and NIHSA have repeatedly anticipated high flood risk, yet communities have consistently been

caught unprepared, receiving inadequate pre-positioned supplies and fragmented post-disaster relief (OCHA, 2024; New Security Beat, 2026). The 2022 floods—the worst in a decade—displaced up to 1.4 million people (IOM, 2023), and post-event surveys found 94.9% of respondents experienced reduced crop yields, 69.2% faced food shortages, and 60% reported hunger (New Security Beat, 2026). The 2024 floods, compounded by the Alau Dam collapse, killed 285, injured 2,504, and displaced 641,598 by mid-September alone, with the full seasonal toll eventually reaching about one million displaced and 1.3 million hectares of crops destroyed (OCHA, 2024; New Security Beat, 2026). A 220% spike in cholera cases was recorded following the floods (IFRC, 2024). These figures are not merely humanitarian statistics; they indicate a governance architecture that has repeatedly received early warning without translating it into preventive action.

### 8.2 Northeastern Humanitarian Emergency

The Boko Haram insurgency's escalation from 2013–2014, and the subsequent emergence of ISWAP, generated displacement at a scale that comprehensively overwhelmed domestic emergency management institutions. Raji et al.'s (2021) assessment of NEMA's response capacity to IDP plights in the Northeast found significant gaps in the agency's ability to address the complex protection, livelihood, health, and shelter needs of displaced populations. Umesi's (2020) parallel investigation of basic education service provision for IDPs in Maiduguri found serious implementation deficits in intervention programs, with affected persons' needs substantially unmet. The security situation continued to deteriorate through 2024–2025, with ISWAP maintaining control over rural territories and conducting deadly raids (Madueke, 2026; ACAPS, 2025). The compounding of insecurity, flooding, cholera, and food insecurity created a chronic multi-hazard humanitarian emergency that illustrates the limits of a DRM system designed primarily around discrete natural disasters rather than complex emergencies.

### 8.3 COVID-19 Pandemic Response

The Presidential Task Force on COVID-19 demonstrated some coordination innovations, but the response also exposed enduring weaknesses in targeting, registration, and accountability. The federal government expanded direct transfers from 2.6 million to 3.6 million households, yet a survey by SB Morgen Intelligence and the Open Society Initiative for West Africa, reported by Ufuoma (2020), found that about 98.8% of respondents said they had received no palliatives; because this is a media-reported survey, it is used as illustration only (rule R4). Muntaka and Osakwe (n.d.) report that the National Social Register held 8.3 million households by May 2021 but captured fewer than half of the poor, that the conditional cash transfer reached about 985,231 beneficiaries (about 1% of the poor, by their estimate), and that weak documentation of the poor and vulnerable and limited transparency undermined targeting and public confidence. The absence of a reliable population register made beneficiary targeting difficult, producing exclusion errors that plausibly affected rural, informal economy, and displaced populations disproportionately. Allegations of diversion of palliatives and of irregularities in COVID-19 procurement circulated widely; they are not independently verified in this study and are treated as an evidence gap rather than a finding. The same data fragmentation and interoperability failure that constrains routine emergency management also constrained the health emergency response, reinforcing the cross-cutting nature of this governance challenge.

### 8.4 Cross-Case Synthesis

Table 3 consolidates the five cases by setting out the policy instruments in force, the institutional challenges documented in the corpus (coded to the themes in Table 2), and the lessons that follow. Where the corpus offers little event-specific evidence, the table says so.



**Table 3. Major disaster cases, policy context, documented institutional challenges, and lessons learned**

| Case and scale                                                                                                                                                                                                                   | Policy instruments in force                                                                                                                                  | Documented institutional challenges (theme)                                                                                                                                                                                                                                                             | Lessons learned                                                                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2012 floods. Over 2.1 million displaced (OCHA, 2024; New Security Beat, 2026)                                                                                                                                                    | NEMA Act 1999 and NEMA operational plans (PreventionWeb, 2007). The 2018 National DRM Policy, 2021 Climate Change Act, and 2023–2030 plans did not yet exist | Framework-level: coordinating mandate without power to compel other agencies (T1; Mashi et al., 2019). Event-level evidence in the corpus is limited to scale of displacement (Section 2.6)                                                                                                             | Provides the baseline: later events show that the 2018–2023 policy additions did not by themselves close the forecast-to-action gap                                                  |
| 2022 floods. Up to 1.4 million displaced (estimates from about 600,000); 440,000 ha farmland damaged; food insecurity and cholera (IOM, 2023)                                                                                    | NEMA Act; National DRM Policy 2018; Climate Change Act 2021; National Policy on IDPs 2021                                                                    | NIHSA early warning not translated into pre-emptive action by state or federal agencies (T2, T1; IOM, 2023). Inconsistent displacement and damage figures across sources (T5; Section 2.7)                                                                                                              | Trigger-based early-action protocols and a single standard impact-reporting format are needed (Recommendations 11.2, 11.3)                                                           |
| 2024 floods. 285 deaths, 2,504 injured; 641,598 displaced by mid-September (about 1 million over the season); 1.3 million ha crops destroyed; Alau Dam collapse; cholera spike (OCHA, 2024; IFRC, 2024; New Security Beat, 2026) | As above, plus National Contingency Plan 2023–2030 and National DRR Strategy 2023–2030 (NEMA, 2024; UNDP, 2024)                                              | Collapsed culverts and damaged access roads impeded aid delivery (OCHA, 2024). Recurrent forecast-without-action pattern and inadequate pre-positioned supplies (T2; OCHA, 2024; New Security Beat, 2026)                                                                                               | Planning instruments are necessary but not sufficient; operational readiness (pre-positioning, access routes, infrastructure risk oversight) must be funded and audited (11.4, 11.7) |
| Boko Haram/ISWAP emergency. Over 2.3 million IDPs and 2 million returnees (IOM, 2024; ACAPS, 2025)                                                                                                                               | National Policy on IDPs 2021; NEMA Act                                                                                                                       | Gaps in NEMA's capacity to address protection, livelihood, health, and shelter needs (Raji et al., 2021). Heavy reliance on international funding (T3; IOM, 2024). Unmet education needs for IDPs (Umesi, 2020, illustrative only). Reported diversion of IDP resources (T4): thin independent evidence | A system designed around discrete natural hazards struggles with complex emergencies; integrated, financed, whole-of-government capacity is required (11.4, 11.5)                    |



|                                                                                                                                                                                                     |                                                                                                                                    |                                                                                                                                                                                                         |                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| COVID-19 response. National scale; about 98.8% of survey respondents reported no palliatives (Ufuoma, 2020); conditional cash transfer reached about 985,231 beneficiaries (Muntaka & Osakwe, n.d.) | Presidential Task Force on COVID-19; National Influenza Pandemic Preparedness and Response Plan (Umesi, 2021; PreventionWeb, 2007) | No reliable population register, targeting and exclusion errors (T5, T4); limited transparency in intervention execution (T4; Muntaka & Osakwe, n.d.). Diversion allegations not independently verified | Beneficiary identity and registry interoperability are preconditions for accountable relief (11.3, 11.7) |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|

Three cross-case lessons follow. First, recurrence: the same forecast-without-action pattern appears in 2022 and 2024 despite the intervening policy additions, which suggests that the binding constraint lies in enforcement, coordination, and resourcing rather than in the absence of plans. Second, scope: the system is configured around discrete natural hazards, whereas the Northeast and COVID-19 cases required integrated, multi-sector capacity. Third, information: in every case, inconsistent or missing data (displacement figures, loss records, beneficiary registers) either delayed action or weakened accountability.

## 9. NIGERIA AND THE INTERNATIONAL DRM FRAMEWORK

Nigeria formally aligned with the Sendai Framework and has developed a National DRR Strategy 2023–2030 and Action Plan 2024–2027 with UNDP support (UNDP, 2024). At the Ninth Africa Regional Platform in Windhoek (October 2024), Nigeria enumerated significant legislative and policy developments: the Climate Change Act (2021), the National Council on Climate Change (2023), the Counter-terrorism Prevention and Prohibition Act (2022), and the National Contingency Plan 2023–2030 (NEMA, 2024). The World Bank provided post-2022 flood assessment support; UNDP supported national and sub-national DRR platforms and the development of a disaster data hub.

However, independent assessments find gaps between commitment and implementation. Okunola (2025), a comparative assessment of multilevel DRR governance in five African countries including Nigeria, argues for moving beyond institutional silos a decade into Sendai implementation, and identifies legal reform, multilevel planning, and stakeholder engagement in Kenya and Namibia as more positive examples. The UNDRR Secretary-General's 2025 report identified inadequate financing, data gaps, limited inclusivity, and escalating disaster displacement as persistent global challenges (UNDRR, 2025), each of which this paper finds to be acute in the Nigerian case. The absence of a standardized national disaster loss database directly undermines Sendai Framework monitoring and Nigeria's ability to demonstrate progress against its seven global targets.

## 10. DISCUSSION: INTERPRETING THE FIVE WEAKNESSES THROUGH THE ANALYTICAL FRAMEWORK

Table 2 paired each theme with a theoretical mechanism and observable indicators. This section tests those pairings against the evidence in Sections 4 to 9, theme by theme, and then considers how the themes interact. It also states how strong the evidence is for each theme, because the strength of evidence differs and the recommendations in Section 11 should be read accordingly.

T1 and institutional theory. Institutional theory predicts that formal rules lacking enforcement and sanctions will be displaced by informal practice (North, 1990). The evidence is consistent with this prediction: the NEMA Act confers a coordinating mandate without power to compel other agencies (Mashi et al., 2019), and the 2018 Policy is a policy instrument without statutory force (NEMA, 2018). The 2012 floods occurred under the 1999 Act alone, whereas the 2022 and 2024 floods occurred under the 2018 Policy and later plans, yet early warnings still failed to trigger pre-emptive action in the latter two (IOM, 2023; OCHA, 2024). This suggests that adding policy instruments without statutory force did not change outcomes, although the

comparison involves only three events and cannot establish causation. Evidence strength: strong (legal text, peer-reviewed study, and agency reports).

T2 and intergovernmental relations. Federalism scholarship expects ambiguous concurrent responsibilities to produce coordination avoidance when political and fiscal incentives diverge (Lawanson et al., 2022), and Comfort (2007) locates failure in coordination and control. The 2022 forecast-to-action gap, the contingency of federal–state cooperation on political alignment (Onwurah & Agbaeze, 2022), and the reported FMHDS–NEMA ambiguity (IOM, 2023) are consistent with both predictions. The evidence does not show that command authority is the only remedy: Umesi (2021) and Comfort (2007) both emphasise agreed protocols and information-sharing, which is why Recommendation 11.2 proposes a coordination compact with trigger-based early action rather than a transfer of command. Evidence strength: moderate to strong.

T3 and fiscal relations. The expectation that mandates without matching resources will produce dependence on external funding is consistent with the reported reliance on international financing for the northeastern response (IOM, 2024) and with assessments of SEMA underfunding (Raji et al., 2021; OCHA, 2024). This is nonetheless the weakest-evidenced theme, because the study did not reconstruct budget and release data (Section 2.6). Evidence strength: moderate; a published appropriation-and-release series is a research and policy priority.

T4 and informal institutions. North's (1990) account of informal institutions fits the reported influence of patronage and loyalty on appointments (Onwurah & Agbaeze, 2022), pervasive nepotism in recruitment (UNODC, 2019), the normalisation of petty corruption in public services (van Duyne & Harvey, 2025), and the transparency concerns raised about COVID-19 relief (Muntaka & Osakwe, n.d.). The evidence for emergency-specific diversion is thinner than the theme's prominence in public debate suggests. Evidence strength: strong for general public-sector corruption; limited for emergency agencies specifically.

T5 and crisis cognition. Comfort's (2007) emphasis on cognition and communication, and Bharosa et al.'s (2010) findings on information sharing in multi-agency response, predict that responders cannot act on information they cannot see or share. The displacement estimates for the 2022 floods ranging from about 600,000 to over 1.4 million, the absence of a national loss database (UNDRR, 2025), the non-aligned SEMA and national reporting formats (OCHA, 2024; Eneh et al., 2024), and the lack of a reliable beneficiary register during COVID-19 (Muntaka & Osakwe, n.d.) all fit this prediction, and the same problem constrained this study. Evidence strength: moderate to strong, although the inventory of agency systems partly rests on practitioner observation (Section 2.7).

Interaction among themes and disconfirming evidence. The themes appear to reinforce one another. Weak statute (T1) leaves coordination (T2) dependent on goodwill; weak coordination without sanction leaves funding (T3) unpredictable and accountability (T4) discretionary; and fragmented data (T5) obscures losses, which weakens the evidential case for funding and the ability to detect diversion. This feedback pattern is an interpretation rather than a tested causal model, but it is consistent with the persistence of the same weaknesses across five administrations and with the observation that single reforms have not been sufficient. Disconfirming evidence points the same way: NIHSA and NIMET forecasts have been accurate and a community-led anticipatory action programme in Yola improved community-level outcomes (IRC, 2025), which indicates that technical and local capacity exists and that the binding constraints are largely governance constraints. Against the Sendai Framework, the evidence indicates the weakest alignment with Priority 2 (governance), Priority 3 (investment), and Priority 1 (understanding risk through data), and a response-heavy rather than risk-reduction orientation overall.

## 11. PATHWAYS FOR REFORM: EVIDENCE-LINKED RECOMMENDATIONS

Each recommendation below is tied to the theme it addresses, the evidence on which it rests, and an indicator by which progress could be tracked; Table 4 summarises these links.



### 11.1 A Comprehensive Disaster Risk Management Act

The most foundational reform is enactment of a modern Disaster Risk Management Act superseding the 1999 NEMA Decree. Such legislation should clearly define mandatory responsibilities across federal, state, and local government; establish legally binding minimum standards for SEMA capacity and financing; create enforceable accountability mechanisms with penalty provisions for non-compliance; integrate climate change adaptation into DRM legal obligations; and align explicitly with Sendai Framework targets. It should also mandate a standardized national disaster loss database with compulsory reporting requirements across all tiers—directly addressing the data inoperability challenge at its legal root. Evidence basis (T1): the NEMA Act's lack of compulsion powers and resource-mobilisation directives (Mashi et al., 2019) and the non-statutory status of the 2018 Policy (NEMA, 2018), discussed in Section 5.1.

### 11.2 A Federal–State Coordination Compact and Trigger-Based Early Action

A statutory intergovernmental coordination mechanism—for example, a standing national DRM coordination forum bringing together NEMA, the FMHDSD, sectoral ministries, and SEMA heads—should be established under the legislation proposed in Section 11.1. It should (i) delimit the respective roles of the FMHDSD and NEMA; (ii) codify sector working groups, lead-agency roles, and information-sharing protocols (Umesi, 2021; Comfort, 2007); and (iii) define trigger-based early action, under which publication of NIHSA or NIMET flood alerts above agreed thresholds obliges federal and state authorities to activate pre-agreed protective measures within defined timeframes, followed by a joint after-action review. Evidence basis (T2): the 2022 forecast-to-action gap (IOM, 2023), the dependence of federal–state cooperation on political alignment (Lawanson et al., 2022; Onwurah & Agbaeze, 2022), and the reported FMHDSD–NEMA ambiguity (IOM, 2023). Progress could be tracked by the proportion of high-risk LGAs in which protective actions are activated before the flood peak.

### 11.3 Interoperable Data Infrastructure for Emergency Management

A dedicated National Emergency Data Interoperability Framework (NEDIF) should be developed and legally mandated, establishing common data standards, shared application programming interfaces (APIs), and unified disaster impact reporting protocols for all federal and state emergency agencies. The framework should align with the Humanitarian Data Exchange (HDX) standards of OCHA and the Sendai Framework Monitor reporting requirements. Investment in a shared geospatial data platform—building on the existing NGDI initiative—would enable real-time spatial integration of hazard, vulnerability, and exposure data across NEMA, NIHSA, NIMET, NASRDA, and relevant infrastructure agencies (SDI Nigeria, 2016; Eneh et al., 2024). This investment is not merely a technical preference; it is an operational necessity for effective multi-agency emergency coordination. Evidence basis (T5): the 600,000 to 1.4 million range in 2022 displacement estimates (Section 2.7), the absence of a national loss database (UNDRR, 2025), non-aligned SEMA reporting formats (OCHA, 2024; Eneh et al., 2024), and the absence of a reliable beneficiary register during COVID-19 (Muntaka & Osakwe, n.d.). Progress could be tracked by the share of SEMAs reporting in the common format and by the annual publication of national disaster loss accounts aligned with the Sendai Monitor.

### 11.4 Fiscal Decentralization and Dedicated DRM Financing

A National Disaster Risk Management Fund with constitutionally guaranteed minimum annual contributions from all three tiers of government should be established. Allocations to SEMAs should be indexed to risk profiles and conditioned on institutional compliance standards. A pre-positioned humanitarian preparedness fund sufficient to support first-response operations for 500,000 displaced persons for 90 days would significantly reduce the response lag that characterizes post-disaster emergency mobilization. The 500,000-person planning figure is of the same order as the 641,598 people displaced by the 2024 floods by mid-September (OCHA, 2024) and should be refined through costing by NEMA and SEMAs. Evidence basis (T3): reported SEMA underfunding (Raji et al., 2021; OCHA, 2024) and dependence on international funding for the northeastern response (IOM, 2024). Because the budget-level evidence is the thinnest of the five themes (Section 10), an early deliverable of the fund should be a published time series of appropriations and releases.



## 11.5 Professionalization and Human Resource Development

Building on the indicative findings of Umesi (2021b), read alongside Raji et al. (2021) and Badiru et al. (2023), a dedicated merit-based emergency management career service should be created with professional competency frameworks, mandatory in-service training, and leadership appointment criteria based on professional qualifications rather than political loyalty. Academic-practitioner partnerships for DRM curriculum development—engaging institutions such as AUST and the National Institute for Policy and Strategic Studies—would build the long-term knowledge base on which professional excellence depends. Evidence basis (T4, T1): perceived politicisation of appointments (Onwurah & Agbaeze, 2022), nepotism in recruitment (UNODC, 2019), and documented capacity gaps (Raji et al., 2021; Badiru et al., 2023).

## 11.6 Community-Centered, Bottom-Up DRM

A cost-effectiveness analysis of a community-led flood preparedness programme implemented by the IRC in Yola found that, compared with direct cash assistance to households, it improved outcomes such as community planning, early warning, and public awareness at a slightly higher cost, at roughly USD 10,000 to 18,000 per key outcome; the IRC itself notes that further research in other locations is needed (IRC, 2025). Scaling such approaches—through community disaster risk assessment in high-risk LGAs, establishment and training of community emergency response teams, integration of indigenous knowledge in early warning systems, and gender-responsive DRM programming—should therefore proceed through phased pilots with embedded evaluation. Evidence basis (overarching reactive posture): the community-interface gap described in Section 4.3, which is offered as practitioner observation, and the Yola findings above.

## 11.7 Institutional Accountability and Anti-Corruption Architecture

Dedicated accountability mechanisms for the emergency management sector should include biometric beneficiary registration linked to the National Identity Management Commission database (subject to data protection safeguards and the interoperability standards in Section 11.3), electronic tracking of emergency commodity distribution, mandatory civil society monitoring of IDP camp management, independent emergency procurement auditing, and swift publicized prosecution of identified diversion cases. Because the evidence on emergency-specific diversion is thinner than on general public-sector corruption (Section 10), an independent baseline audit of a recent response operation should precede these controls and calibrate them. Evidence basis (T4): general corruption and nepotism evidence (UNODC, 2019; van Duyne & Harvey, 2025), perceived politicisation (Onwurah & Agbaeze, 2022), and transparency concerns in COVID-19 relief (Muntaka & Osakwe, n.d.).

**Table 4. Traceability of recommendations to themes, evidence, and indicators**

| Recommendation                                                         | Theme | Core evidence in this paper                                                                                                                                           | Progress indicator                                                                   |
|------------------------------------------------------------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| 11.1 Comprehensive DRM Act                                             | T1    | No compulsion powers or resource directives in the NEMA Act (Mashi et al., 2019); 2018 Policy non-statutory (NEMA, 2018)                                              | Enactment; statutory minimum standards for SEMAs                                     |
| 11.2 Federal–state coordination compact and trigger-based early action | T2    | 2022 forecast-to-action gap (IOM, 2023); politically contingent cooperation (Lawanson et al., 2022; Onwurah & Agbaeze, 2022); FMHDS–NEMA ambiguity (IOM, 2023)        | Share of high-risk LGAs with protective action activated before flood peak           |
| 11.3 Interoperable data infrastructure (NEDIF)                         | T5    | 600,000–1.4 million range in 2022 displacement estimates; no loss database (UNDRR, 2025); non-aligned formats (OCHA, 2024; Eneh et al., 2024); COVID-19 register gaps | Share of SEMAs using common format; annual loss accounts aligned with Sendai Monitor |



|                                                      |             |                                                                                                                                                                             |                                                                                         |
|------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| 11.4 Dedicated DRM financing                         | T3          | SEMA underfunding (Raji et al., 2021; OCHA, 2024); external dependence (IOM, 2024); 641,598 displaced by mid-September 2024 (OCHA, 2024)                                    | Published appropriation-and-release series; fund capitalisation; SEMA budget lines      |
| 11.5 Professionalization                             | T4, T1      | Politicised appointments (Onwurah & Agbaeze, 2022); nepotism (UNODC, 2019); capacity gaps (Raji et al., 2021; Badiru et al., 2023)                                          | Competency framework adopted; share of leadership appointments meeting criteria         |
| 11.6 Community-centered DRM                          | Overarching | Yola cost-effectiveness analysis (IRC, 2025); LGA gap (practitioner observation, Section 4.3)                                                                               | Number of high-risk LGAs with assessments and trained response teams; pilot evaluations |
| 11.7 Accountability and anti-corruption architecture | T4          | General corruption and nepotism evidence (UNODC, 2019; van Duyne & Harvey, 2025); COVID-19 transparency concerns (Muntaka & Osakwe, n.d.); thin emergency-specific evidence | Baseline audit completed; share of relief commodities tracked end to end                |

## 12. CONCLUSION

Nigeria's emergency management challenges from 1999 to 2025 are rooted in deeply embedded governance weaknesses: policy-implementation gaps driven by institutional misalignment, federal–state coordination that is contingent on political alignment, chronic underfunding, corruption and politicisation that divert resources and weaken accountability, and data inoperability that blinds responders and planners alike. These weaknesses have persisted across five administrations, suggesting systemic rather than individual causes, and the evidence indicates that they reinforce one another. The 2024 flood season—which displaced about one million people, destroyed 1.3 million hectares of crops, and coincided with cholera outbreaks reported across 36 states—is not an anomaly; it is consistent with a DRM system that continues to manage risks reactively rather than reduce them proactively.

The reform agenda articulated in this paper is grounded in the documentary evidence assembled in Sections 4 to 9, and each recommendation is traced to that evidence in Table 4. The author's insider experience informed interpretation but was not relied on as sole evidence. As argued in Umesi (2021), the tripod of cooperation, communication, and coordination must be "constantly oiled" if humanitarian action is to succeed. Oiling this tripod requires legislative modernization, a federal–state coordination compact, interoperable data infrastructure, fiscal commitment to DRM, professional capacity development, community-centered approaches, and credible accountability mechanisms—acting together rather than sequentially, because the weaknesses they address are mutually reinforcing. What is ultimately required is the political will to subordinate partisan, patronage, and pecuniary interests to the imperative of protecting Nigerian lives and livelihoods from foreseeable and preventable disasters. The Sendai Framework's 2030 targets provide the external accountability mechanism; Nigeria's people provide the moral imperative.

The findings should be read in light of the limitations stated in Section 2.6: the design is documentary and single-coder, coverage of sub-national structures and emergency-specific corruption is thin, and budget-level claims rest on assessments rather than appropriation data. Future research should therefore reconstruct NEMA and SEMA appropriation and release series, test emergency-specific diversion through audit and field evidence, collect primary data through interviews with federal and state officials, and examine the political economy of DRM reform, the role of digital technologies in bridging data inoperability gaps, and the conditions under which community-based DRR interventions can be systematically scaled. This paper



contributes to that inquiry by establishing an analytical baseline against which future governance trajectories can be assessed.

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