

## NIGERIA | THE FEDERAL MINISTRY OF INTERIOR GRANTS EXCLUSIVE APPROVAL RIGHTS TO THE HONOURABLE MINISTER AND PERMANENT SECRETARY FOR EXPATRIATE QUOTA AND CITIZENSHIP APPLICATIONS

### Summary

The Nigerian Federal Ministry of Interior (“**FMI**”), by a circular dated February 12, 2025 (MIA/B.138/S.381/I/98) (the “**Circular**”), has revised the approval process for **Expatriate Quota (EQ) and Citizenship applications** (the “**Applications**”). The Circular grants exclusive approval rights within specified thresholds to the **Honourable Minister of Interior** and the **Permanent Secretary**, removing such powers from the **Director level**.

The purpose of the revised approval framework is to effect transparency, accountability and operational efficiency in the administration of the Applications while addressing potential abuses and irregularities within the system of Applications.

### Background

The EQ is a facility granted to companies/organizations to enable them to employ foreign professionals with skills and competences in fields that are in short supply or not available locally. Within the FMI, the highest-ranking officials are the Minister of Interior, followed by the Permanent Secretary and then the Directors.

Prior to the issuance of the Circular, Directors had the authority to approve certain EQ and Citizenship applications. However, under the new framework, these approval rights have been removed from the Director level, centralizing all decisions at the Ministerial and Permanent Secretary levels.

### Need-to-know Information.

Please see below the revised approval framework made pursuant to the Circular:

A. The approval rights for the following activities have been granted to the Honourable Minister:

1. Business Permit
2. Amendment of Business Permit
3. Establishment/Grant of EQ
4. Upgrading/Revalidation of Permanent Until Review (PUR)
5. Project Tagged Quota
6. Renewal of EQ with quantity of Twenty-one (21) and above
7. Additional EQ with quantity of Eleven (11) and above
8. Redesignation of EQ
9. Relinquishment of Quota
10. Special Immigration status for Expatriate Husbands
11. Private Guards License (Approval and Signing of Certificate)
12. Renewal of Category “A” License staff strength of Five Hundred (500) and more
13. Temporary Permit to Operate Private Guard

B. The approval rights for the following activities have been granted to the Permanent Secretary:

1. Renewal of EQ with quantity of one (1) to twenty (20)
2. Additional EQ with quantity of one (1) to ten (10)
3. Relinquishment of Quota
4. Stay of Action
5. Licensing of Churches for Marriage
6. Special Marriages
7. Renewal of Category “B” License staff strength of less than 500

The Circular is to take immediate effect and supersede all prior guidelines.

## Implications of the revised approval framework

A key implication of the new framework is the potential for increased processing times for expatriate quota and citizenship applications submitted by businesses, investors, and expatriates seeking employment and residence in Nigeria. Previously, Directors within the Federal Ministry of Interior had the authority to approve certain categories of applications, which allowed for a more decentralized and efficient processing system.

By removing approval rights at the Director level and centralizing decision-making at the Ministerial and Permanent Secretary levels, there is a likelihood of administrative bottlenecks due to the higher volume of applications requiring review at the top levels of the Ministry.

While this development is intended to enhance oversight, transparency, and accountability in the approval process, it also places a significant administrative burden on the Minister and the Permanent Secretary. The increased workload may lead to longer lead times for application approvals, which could, in turn, affect businesses relying on expatriate talent for their operations. Delays in processing expatriate quota renewals or approvals could impact workforce planning for multinational companies, hinder investment decisions, and create uncertainties for expatriates seeking employment in Nigeria.

Ultimately, while the reform seeks to address concerns regarding irregularities in the system, it may also result in unintended administrative inefficiencies. Businesses and expatriates may need to anticipate longer processing timelines and plan accordingly to mitigate potential disruptions caused by the new approval structure.

## How we can help

We specialize in providing comprehensive support to businesses navigating the complexities of Nigerian immigration law. Our expert services encompass providing advice and assistance to ensure seamless compliance with the continually evolving relevant regulations. We can also help navigate this new development and ensure compliance.

For additional information, please contact Immigration Team Bloomfield LP - Email [immigration@bloomfield-law.com](mailto:immigration@bloomfield-law.com) or call +234 1 454 2130

This alert is for general information only. It is not offered as advice, on any matter, whether legal, procedural, or otherwise.



© 2025 BloomfieldLP. All rights reserved

### DISCLAIMER

This is a publication of Bloomfield LP and is for general information only. It should not be construed as legal advice under any circumstance and Bloomfield LP shall bear no liability for any reliance on this publication. For further information about the Firm, its practice areas, publications and details of seminars/events, please visit: [www.bloomfield-law.com](http://www.bloomfield-law.com).